

CAA Non- Executive Board Members:

Ms Anne Lambert
Ms Katherine Corich



BY EMAIL ONLY TO DR CHRIS CROCKFORD

CC TO RICHARD RYAN

14 October 2025

To: Electric Airshows Limited, Electric Aviation Limited and Dr Chris Crockford

Your Regulation 6 Review
Hearing Date: 12 September 2025

The Review Panel's decision is as follows:

SECTION A: INTRODUCTION

1. This is the decision of the Panel concerning the following matters, which have been subject to a review pursuant to Regulation 6 of the Civil Aviation Authority Regulations 1991 ('**Reg 6**'):
 - i) The application dated 11 October 2024 by Electric Airshows Limited ('**Airshows**') for an Operational Authorisation in respect of an Unmanned Aircraft System ('**UAS**') pursuant to UK Regulation (EU) 2019/947 ('**UAS Implementing Regulation**'). The application was refused by the CAA's Safety and Airspace Regulation Group ('**SARG**') by letter dated 7 April 2025.
 - ii) The proposal dated 8 May 2025 by SARG to suspend the UAS Operator Identification ('**Operator ID**') of Airshows for six months.
 - iii) SARG's proposal also of 8 May 2025 to revoke the UAS Operator ID of Electric Aviation Limited ('**Aviation**').
 - iv) SARG's proposal also of 8 May 2025 (amended on 27 May 2025) to suspend the UAS Operator ID and Flyer Identification ('**Flyer ID**') of Dr Crockford for six months.
2. The Operator ID of Airshows and the Operator and Flyer ID of Dr Crockford were also provisionally suspended on 8 May 2025 pursuant to Regulation 6(8). That decision is not part of this Reg 6 review.
3. Dr Crockford had indicated to SARG in advance of and on 13 March 2025, prior to formal notification, that he sought a Reg 6 review of SARG's decision to refuse Airshows' Operational Authorisation application.

4. SARG submitted a brief dealing only with this review on 6 May 2025.
5. On 9 May 2025 Mr Richard Ryan, the barrister acting for Aviation, Airshows and Dr Crockford (together '**the Applicants**') requested a review of the proposals to revoke Aviation's Operator ID, to suspend Dr Crockford's Operator ID and Flyer ID, and to suspend Airshows' Operator ID.
6. On 18 June 2025 the Panel determined to hear all of the reviews together at a two day in-person hearing.
7. SARG accordingly submitted an amended brief on 7 July 2025, dealing with all four decisions set out in paragraph 1 above.
8. On 31 July 2025 the Applicants provided their response to the brief together with accompanying documents which amounted to over 900 pages of material, including a detailed 'Rebuttal' document containing the principal written submissions which was 204 pages long.
9. SARG provided its response to this ('SARG comments on Rebuttal for Regulation 6 review') on 19 August 2025.
10. According to the timetable in place for the Reg 6 review, the Applicants were due to respond to SARG on 28 August 2025. However, on 26 August 2025, Mr Ryan sent a letter, on behalf of the Applicants, raising a number of issues, including (i) a request for substantial disclosure and further information and (ii) a request to vacate the hearing of the Reg 6 review scheduled for 11 and 12 September 2025, and to relist it for a later date.
11. The Panel considered the request to vacate the hearing and rejected it in a separate decision dated 4 September 2025. The reasons given included: the parties had already had the chance to make detailed submissions and submit documents to the Panel; there appeared to be no good reason why the request was not made earlier; and it was possible for the Panel to consider the requests while maintaining the hearing date (allowing for further submissions after the hearing in the event of further documents/information being produced if necessary). The substantive request for documents and further information was therefore to be considered by the Panel once further submissions from the parties were received.
12. SARG responded in writing to the request for further information and documents on 4 September 2025, rejecting most of the requests. The Applicants sent a letter on 5 September 2025 threatening a judicial review and injunction in order force the CAA to vacate the hearing on a number of grounds, including the outstanding disclosure requests. That demand was rejected by letter dated 8 September 2025 because (among other things) the Panel had not yet decided the disclosure requests, and the Panel had reasonably decided to maintain the hearing date while considering the disclosure requests in parallel. Accordingly, the Applicants were invited to provide substantive comments on the SARG position.
13. The injunction threat was not pursued. On 9 September 2025 the Applicants provided their written response to SARG's position in relation to the disclosure requests. At the hearing Dr Crockford and Mr Ryan were invited to make any further submissions they wished as regards the disclosure requests, but they did not do so. By email dated 17 September 2025 the CAA Review Panel Lawyer (**RPL**) informed the parties that the Panel did not consider that SARG should be asked to produce further documents and information and would supply their reasons in this Decision Letter. The disclosure requests are dealt with in **section F** below.
14. Also on 29 August 2025 Mr Ryan submitted a document entitled 'SARG Notes erratum and Observations' which was a paragraph-by-paragraph response to the SARG comments document dated 19 August 2025, together with an 'Amended Personal Statement' from Dr Crockford.
15. SARG's comments of 19 August included a suggestion as to how to narrow the issues to

be considered at the hearing (the Applicants having served voluminous submissions and accompanying materials including an exposition of nine 'contested legal issues' and 16 'issues for the Panel to consider'). SARG's proposal was to leave some of the issues out of scope since it said they were irrelevant to the questions for the Panel, and for the Panel to decide other issues on the papers, leaving only what SARG identified as the central issues to be decided at the hearing.

16. The Applicants responded on 26 August 2025 indicating their agreement to 'park' certain sections of their submissions (the sections headed 'harassment', 'ECHR' and 'Psychology') and, while noting that anything which bore on how the decisions were made was relevant, concluding that "*we are content to focus on the issues for the panel to consider as suggested by SARG in their Supplementary brief*".
17. In light of that apparent agreement, on 2 September 2025 the RPL wrote to the parties asking them to produce a stand-alone document setting out a single list of issues for the hearing. SARG's proposed list was produced on 4 September 2025. The Applicants were invited to provide their comments on that list and eventually did so via a letter from Dr Crockford on 9 September 2025.
18. The list of issues was ultimately not agreed and it was made clear to the Applicants at the hearing that it was open to them to raise whatever arguments and issues they wished at the hearing in the time allotted to them.¹
19. Dr Crockford's letter of 9 September 2025 also requested that, although two days had been set aside, the hearing should be condensed down to one day. Dr Crockford indicated that it was difficult for him to attend the hearing in person on 11 September 2025 owing to the industrial action on the London Underground. The Panel therefore agreed to hold a one-day in-person hearing on 12 September 2025.
20. The proposal to revoke the Applicant's licence has been considered by a CAA Panel comprised of Ms Anne Lambert and Ms Katherine Corich, who are appointed by the Secretary of State for Transport as Non-Executive Members of the Board of the CAA. The Panel's role in this matter is to exercise its own judgement on the questions it is required to consider and it has made its decision independently of the parties.
21. The hearing of the Applicants' Reg 6 review took place on 12 September 2025, at a public hearing at the Sandman Signature Hotel, Gatwick, at which both the Applicants and SARG were legally represented (Dr Crockford's legal representative appearing by video link). Dr Crockford was also accompanied by what he described as a 'subject matter expert' although he did not make any representations to the Panel.
22. As well as hearing submissions from each side's legal representative, and oral evidence and representations from Dr Crockford on behalf of the Applicants, and Mr Kevin Woolsey and Mr Callum Conde on behalf of SARG, the following written material has been considered by the Panel:
 - i) The SARG amended brief dated 7 July 2025.
 - ii) The Applicants' written response and accompanying materials submitted on 31 July 2025.
 - iii) SARG's comments on the Applicant's written response dated 19 August 2025.
 - iv) The Applicants' document entitled 'SARG Notes erratum and Observations' submitted on 29 August 2025.
 - v) SARG's response to the Applicant's disclosure request dated 4 September 2025 and the Applicant's comments dated 9 September 2025.
 - vi) SARG's note on the powers of the CAA to take action in relation to operator ID and Flyer ID submitted on 10 September 2025.
 - vii) The Applicant's post-hearing letters and accompanying documents to the

¹ Hearing transcript page 8, lines 7-11 and page 9, lines 14-21

Panel, dated 13 September and 2 October 2025.

- viii) The remainder of the material in the binders of material prepared for the Hearing.

23. The remainder of this decision letter is structured as follows:

- i) Section B summarises the relevant legal and policy framework and the issues for decision.
- ii) Section C deals with the factual chronology and background.
- iii) Section D summarises SARG's proposal and its submissions.
- iv) Section E summarises the submissions on behalf of the Applicants.
- v) Section F deals with the requests for information and disclosure.
- vi) Section G gives the Panel's discussion of, and determination on the key issues.
- vii) Section H is the Panel's answers to the questions posed.

SECTION B: LEGAL AND POLICY FRAMEWORK

Legislative framework

24. UK Regulation (EU) 2018/1139 ('**Basic Regulation**') sets out the fundamental principles of aviation safety regulation in the UK. Article 62 is entitled "*Certification, Oversight and Enforcement*" and the relevant part is as follows:

"1. The Secretary of State and the CAA must cooperate to ensure compliance with this Regulation and with regulations made under it.

2. To ensure compliance with this Regulation and with regulations made under it, the CAA shall:

(a) receive and assess the applications made to the CAA, and, where applicable, issue or renew certificates and receive declarations made to the CAA , in accordance with Chapter III;...

(b) perform oversight of holders of certificates, of natural and legal persons that made declarations, and of products, parts, equipment, ATM/ANS systems and ATM/ANS constituents, flight simulation training devices and aerodromes subject to this Regulation;

(c) conduct the necessary investigations, inspections, including ramp inspections, audits and other monitoring activities to identify possible infringements by legal or natural persons subject to this Regulation of the requirements set out in this Regulation and in regulations made under it;

*(d) take all necessary enforcement measures, including amending, limiting, suspending or revoking certificates issued by the CAA, grounding of aircraft and imposing penalties, in order to terminate identified infringements."*²

25. The use of UASs (including what are more colloquially referred to as 'drones') in the UK is governed by assimilated EU legislation, most particularly the UAS Implementing Regulation. This text was originally adopted in the European Union and assimilated into UK law after Brexit. One of the main purposes of this Regulation, according to its preamble, is to ensure the safety of people on the ground and other aerospace users during the

² Hearing bundle, Binder 2, page A5f

operations of unmanned aircraft.

26. The UAS Implementing Regulation envisages three categories of operation of UASs: open, specific and certified. Operations in the 'open' category do not require any prior operational authorisation, while operations in the 'specific' category require an operational authorisation issued by the CAA. The 'certified' category is the most heavily regulated of all but does not apply for present purposes.
27. Article 4 provides that operations shall be classified in the 'open' category, only where the following requirements are met:
- “(a) the UAS belongs to one of the classes set out in Delegated Regulation (EU) 2019/945 or is privately built or meets the conditions defined in Article 20;*
- (b) the unmanned aircraft has a maximum take-off mass of less than 25 kg;*
- (c) the remote pilot ensures that the unmanned aircraft is kept at a safe distance from people and that it is not flown over assemblies of people;*
- (d) the remote pilot keeps the unmanned aircraft in VLOS [i.e. Visual Line of Sight] at all times except when flying in follow-me mode or when using an unmanned aircraft observer as specified in Part A of the Annex;*
- (e) during flight, the unmanned aircraft is maintained within 120 metres from the closest point of the surface of the earth, except when overflying an obstacle, as specified in Part A of the Annex*
- (f) during flight, the unmanned aircraft does not carry dangerous goods and does not drop any material;”*
28. Article 5 deals with the 'specific' category and provides (so far as relevant) that:
- “1. Where one of the requirements laid down in Article 4 or in Part A of the Annex is not met, a UAS operator shall be required to obtain an operational authorisation pursuant to Article 12 from the CAA.*
- 2. When applying to the CAA for an operational authorisation pursuant Article 12, the operator shall perform a risk assessment in accordance with Article 11 and submit it together with the application, including adequate mitigating measures.*
- 3. In accordance with point UAS.SPEC.040 laid down in Part B of the Annex, the CAA shall issue an operational authorisation, if it considers that the operational risks are adequately mitigated in accordance with Article 12.*
- 4. The CAA shall specify whether the operational authorisation concerns:*
- (a) the approval of a single operation or a number of operations specified in time or location(s) or both. The operational authorisation shall include the associated precise list of mitigating measures;*
- (b) the approval of an LUC, in accordance with part C of the Annex.”*
29. Article 7 requires any UAS operations in the 'specific' category to comply with the limits set out in the operational authorisation. Article 11 sets out the detailed rules for conducting an operational risk assessment. That risk assessment requires a description of the UAS operation, including (at Article 14(2)(a)) a description of the nature of the activities performed and (at Article 14(2)(e)) the competence of the personnel for conducting the

operation including their composition, role, responsibilities, training and recent experience.

30. Article 12 delineates the requirements of authorisation of UAS operations in the 'specific' category:

"1. The CAA shall evaluate the risk assessment and the robustness of the mitigating measures that the UAS operator proposes to keep the UAS operation safe in all phases of flight.

2. The CAA shall grant an operational authorisation when the evaluation concludes that:

(a) the operational safety objectives take account of the risks of the operation;

(b) the combination of mitigation measures concerning the operational conditions to perform the operations, the competence of the personnel involved and the technical features of the unmanned aircraft, are adequate and sufficiently robust to keep the operation safe in view of the identified ground and air risks;

(c) the UAS operator has provided a statement confirming that the intended operation complies with any applicable [...] rules relating to it, in particular, with regard to privacy, data protection, liability, insurance, security and environmental protection.

3. When the operation is not deemed sufficiently safe, the CAA shall inform the applicant accordingly, giving reasons for its refusal to issue the operational authorisation."

31. Article 14 requires the CAA to establish and maintain accurate registration systems for UASs whose design is subject to certification and for UAS operators whose operation may present a risk to safety, security, privacy and protection of personal data or environment.

CAA Policy

32. CAP 722D sets out the abbreviations and master glossary for UASs in the UK and refers to an Accountable Manager in these terms:

*"A nominated person who has the authority for ensuring that all activities are carried out in accordance with the applicable requirements and regulations. The Accountable Manager is also responsible for establishing and maintaining an effective Safety Management System."*³

33. SARG submits that Articles 11 and 12 of the UAS Implementing Regulation require it to have regard to the competence and characteristics of the relevant personnel involved with UASs, including Accountable Managers pursuant to CAP 722D. One relevant issue for the CAA in this regard is the requirement to be satisfied of the fitness of character of the relevant individuals and post holders.

34. In this regard the CAA sets out its approach in the Fitness of Character Policy Framework ("FOCPF") published on its website at <https://www.caa.co.uk/our-work/about-us/doing-business-with-the-cao/fitness-of-character-policy-framework/>. According to that:

"The CAA is under an obligation to be satisfied, on a continuing basis, of the fitness of character of individuals and post holders which it licences or approves in accordance with applicable legislation. Legislation does not specify how an individual or post holder will be expected to satisfy the CAA. Therefore, the CAA has discretion in relation to how fitness of character is assessed.

³ Hearing bundle, Binder 2, page A65

The CAA must consider options for any regulatory intervention when available information indicates that a person may no longer have the fitness of character appropriate to the privileges of their licence or authorisation.”⁴

35. The FOCPF also requires the following:

“The CAA must be satisfied that all individuals and post holders who are licensed by us demonstrate the following behaviours:

- *Trustworthiness – the ability to be relied on as honest and truthful*
- *Propensity to obey rules – demonstrably being consistent in applying the rules, in spirit and letter*

When considering these behaviours, the CAA will take into account the overriding need to:

- *Protect the general public;*
- *Maintain public confidence in the individual and post holder privileges that we licence; and*
- *Maintain public confidence in the CAA’s own decision-making process.*

Specific information that may call into question fitness of character includes, but is not limited to, the following:

- *Criminal convictions or civil sanctions. Anyone convicted of an aviation related offence or dishonesty offence is unlikely to be regarded as having fitness of character. Convictions for unrelated offences may be relevant when considering propensity to obey rules.*
- *Falsification of records.*
- *Providing false information.*
- *Previous licensing or enforcement action has been undertaken.*
- *Dishonest behaviour.*

This fitness of character policy sits alongside any competence or skills and medical fitness requirements that must be demonstrated by individuals and post holders in order to be licensed by the CAA.”⁵

36. The website also points out that *“in reaching a decision [i.e. as to fitness of character] we will consider all potential outcomes ranging from taking no action to proposing to revoke a privilege or licence.”*

37. SARG has set out its approach to enforcement in its policy document CAP 1074. As regards non-compliance with licensing or approval requirements this states as follows:

“Where a non compliance gives rise to an unacceptable loss of safety, we will take action to suspend, or vary the certificate, licence or approval Where a non compliance results in an unacceptable loss of safety and we do not consider that the organisation or

⁴ Hearing bundle, Binder 2, page A66

⁵ Hearing bundle, Binder 2, pages A66-A67

individual will return to compliance, we will revoke the licence, approval or certificate”

38. CAP 1074 also refers to fitness of character in the context of personnel licencing, summarising the criteria in the FOCPF already set out above.
39. The CAA has published detailed Guidance Material and Acceptable Means of Compliance (**‘AMC’**) in relation to the provisions of the Implementing Regulation (produced in a consolidated form and published on the CAA website). This sets out (at UAS.OPEN.060) the detailed responsibilities of the remote pilot (**‘RP’**) in the ‘open’ category, which includes the requirement to keep the unmanned aircraft in visual line of sight (**‘VLOS’**) and maintain a thorough visual scan of the airspace and surrounding the unmanned aircraft in order to avoid any risk of collision with any manned aircraft, and to have the ability to maintain control of the unmanned aircraft. The AMC (AMC1 UAS.OPEN.060(2)(d)) specifies that:
- “in order to maintain control of the UA, the RP should... (2) not operate a UA while also operating a moving vehicle” and “[i]f, as a passenger, the RP operates a UA from a moving ground vehicle or boat, the speed of the vehicle must be slow enough for the RP to maintain a VLOS of the UA, maintain control of the UA at all times and maintain situational awareness and orientation”.*⁶
40. As to the requirement to register UASs and UAS operators, the CAA proceeds as follows. To operate in the ‘open’ or ‘specific’ UAS Category the remote pilot must have a Pilot/Flyer ID and the Operator must have an Operator ID:
- “A UAS cannot operate unless the pilot fulfils certain requirements, specifically passing the online theoretical knowledge examination. Once a remote pilot passes that examination they will be issued with a Pilot/Flyer ID. Passing the examination is the key requirement to obtain a Pilot/Flyer ID. Once obtained a Pilot/Flyer ID is valid for a period of 5 years.”* (UAS.OPEN.070)⁷
41. If an entity owns or operates a UAS then it requires an Operator ID. This is done via an online application on the CAA’s Drone and Model Aircraft Registration and Education Service or **‘DMARES’**. If completed correctly the Operator ID will be granted automatically. An Operator ID is valid for a year. In the same way as the original application if the online application for a renewal is completed correctly then the renewal will be automatically granted.

Questions for the Panel

42. The relevant questions for the Panel are as follows (by reference to the legislative framework and policy provisions set out in paragraphs 24 to 40 above).

QUESTION 1

On the balance of probabilities, in respect of the refusal of Airshows’ Operational Authorisation, –

- i) Did Dr Crockford fail to properly engage with SARG;
- ii) Does Dr Crockford’s failure to properly engage demonstrate that Airshows has failed to provide sufficient assurance that the nominated Accountable Manager – the key position when considering flight safety – is suitably competent to conduct that role; and

⁶ Hearing bundle, Binder 2, pages A53-A54

⁷ Hearing bundle, Binder 1, page 10

- iii) Accordingly, should Airshows' application for an Operational Authorisation be refused?

QUESTION 2

On the balance of probabilities, in respect of the decisions to suspend Dr Crockford's Operator ID and Flyer ID, –

- i) Is Dr Crockford continuing to fail to properly engage with SARG;
- ii) Does Dr Crockford's continued failure to properly engage and indicated future intention not to engage demonstrate that he presents a risk justifying the suspension of his Operator ID and Flyer ID;
- iii) Accordingly, should Dr Crockford's Operator ID and Flyer ID be suspended pending his suitable re-engagement or further consideration in November 2025?

QUESTION 3

On the balance of probabilities, in respect of the decision to suspend Airshows' Operator ID, –

- i) Is Dr Crockford continuing to fail to properly engage with SARG;
- ii) Does Dr Crockford's continued failure to properly engage and indicated future intention not to engage demonstrate that he presents a risk justifying the suspension of Airshows' Operator ID given Dr Crockford's overarching position within Airshows;
- iii) Accordingly, should Airshows' Operator ID be suspended pending Dr Crockford's suitable re-engagement or further consideration in November 2025?

QUESTION 4

On the balance of probabilities, in respect of the decision to revoke Aviation's Operator ID, –

- i) Is Dr Crockford continuing to fail to properly engage with SARG;
- ii) Does Dr Crockford's continued failure to properly engage and indicated future intention not to engage demonstrate that he presented a risk justifying the proposal to revoke Aviation's Operator ID given Dr Crockford's overarching position within Aviation, Aviation was dissolved in 2024, Dr Crockford indicated he could not provide information relating to Aviation in 2024 as it had been dissolved and that Aviation's Operator ID was due to and did expire on 12 May 2025;
- iii) Accordingly, should Aviation's Operator ID have been revoked?

43. The Panel expressly noted at the hearing that it has the discretion to deviate from the questions that have been posed by SARG if it would be appropriate to do so in light of the submissions and evidence that are presented.

SECTION C: CHRONOLOGY/BACKGROUND

44. In this section some of the voluminous correspondence in the hearing bundles is summarised, but this does not purport to be a complete chronology of the correspondence and communications between the Applicants and the CAA.
45. Dr Crockford obtained his current Pilot/Flyer ID on 31 March 2023 and it is due to expire on 31 March 2028.
46. Dr Crockford obtained his current Operator ID on 31 March 2025 and it is due to expire on 3 April 2026.
47. Aviation was incorporated on 11 February 2020, and Dr Crockford was the sole Director and Company Secretary. Dr Crockford was also the initial sole shareholder of this company before transferring the single share to Digital and Future Technologies Limited on 18 January 2021. Dr Crockford controls Digital and Future Technologies Limited.
48. The Confirmation Statement of Aviation dated 19 January 2021 notes the principal activity of the company as “non-scheduled passenger air transport”. The Confirmation Statements dated 19 January 2022, 19 January 2023 and 19 January 2024 note the principal activity of the company as ‘Dormant Company’.
49. Aviation was granted a PDRA01⁸ Operational Authorisation in the ‘specific’ category on 20 July 2023, expiring one year later. Dr Crockford was named as the operational point of contact for Aviation. The limitations on the type of operation for which authorisation was granted included the following: *“VLOS (‘Visual line of sight’) only. But remote pilots may be assisted by a single unmanned aircraft observer, who must be positioned alongside the remote pilot. The unmanned aircraft observer must maintain direct unaided visual contact with the unmanned aircraft sufficient to monitor its flight path in relation to other aircraft, persons, vehicles, vessels and structures for the purpose of avoiding collisions, and advise the remote pilot accordingly.”*
50. Aviation was involved in a project entitled Morecambe Bay Medical Shuttle which was intended to allow a drone to fly across Morecambe Bay between Lancaster Royal Infirmary and Furness General Hospital.
51. Dr Crockford sent an email to an employee of BAE systems (the air traffic services manager at Walney aerodrome) on 27 July 2023 concerning the planned future operations in this regard including a plan to install a drone landing pad at Furness General Hospital and then to conduct a ‘VLOS flight from a supporting aircraft’ i.e. a drone flight where the remote pilot of the drone was themselves based in an aircraft in flight.
52. This email was forwarded to SARG on 3 August 2023, with a cover email in which the BAE employee indicated his concern: *“to say that my eyes opened VERY wide on reading the content and that I have alarm bells ringing is an understatement – I would appreciate your thoughts please!”*.
53. On 10 August 2023 an employee of the CAA’s Remotely Piloted Aircraft System Sector Team (‘RPAS’), a unit within SARG, telephoned the Chief Allied Health Professional and Healthcare Scientist at Morecambe Bay Health Authority to enquire about the operations planned to be conducted at Furness General Hospital. A summary of the conversation was recorded in a follow up email sent the following day to him:

“The understanding of the intended operations to be conducted by Electric Aviation Limited is as follows:

⁸ A Pre-Defined Risk Assessment

1. 'Phase 1'

- a. Take off from a drone pad installed at Furness General Hospital.
- b. Conduct a Visual Line of Sight flight for a duration equivalent to that between Furness General and Royal Lancaster Hospitals.
- c. Gather temperature and vibration data of samples that are not categorised as dangerous goods.
- d. Land back to the drone pad at Furness General Hospital.

2. 'Phase 2'

- a. Take off from a drone pad installed at Furness General Hospital.
- b. Conduct a formation flight with the drone and a manned aircraft between Furness General and Royal Lancaster Hospitals.
- c. Land at Royal Lancaster Hospital.

From the description you have provided, the 'Phase 1' operation may be within the scope of the Pre-Defined Risk Assessment (PDRA) 01 Operational Authorisation granted to Electric Aviation Limited. This assumes, from a top-level perspective, the operator has:

1. secured all necessary permissions such as those from the site, landowner, and any owners or controllers of airspace within which the operation may be conducted.
2. conducted a full risk assessment of the proposed operational area, taking into account air and ground risks, to keep 3rd parties uninvolved with the operation safe.
3. put in place necessary contingency and emergency volumes with necessary safety buffers to ensure that any overflight of uninvolved people must be kept to a minimum, and protected should a failure occur.
4. concluded that the operation can be conducted safely, with the risks to 3rd parties uninvolved with the operation assessed as tolerable, with the risks as low as reasonably practicable, and compliant with the applicable regulations.

'Phase 2' as outlined would not be permitted under a PDRA01 Operational Authorisation. Such an operation would not be safe because it falls outside that which has been risk assessed by the Civil Aviation Authority (CAA) with the robustness of multiple key mitigations contained within the PDRA01 risk assessment severely degraded. To conduct 'Phase 2' would require a Case 1 Specific Category Operational Authorisation and appropriate airspace arrangements in place, requiring the application and submission of an Operational Safety Case to the CAA for assessment."⁹

54. Also on 11 August 2023 the RPAS team sent an email to Dr Crockford at three email addresses ([REDACTED] [REDACTED] [REDACTED]) stating that it had considerable concerns about the feasibility, safety, and legality of the proposed operation. The email set out why the RPAS team did not consider that the proposed operation could be permitted under Aviation's existing Operational Authorisation including the PDRA01 because:

- i) "The proposed operation falls well outside that which has been risk-assessed by the CAA, and therefore does not meet the Article 12(2) of UK Regulation (EU) 2019/947 requirements to authorise (i.e. within the specific category).
- ii) PDRA01 is to facilitate VLOS Operations within 150 metres of any Residential, Commercial, Industrial or Recreational Areas for UAS with a Maximum Take-Off Mass of less than 25kg. The risk assessment conducted by the CAA assumed that the Remote Pilot was stationary, or moving in a

⁹ Hearing bundle, Binder 2, page C11

vehicle under conditions where there is no potential for the hinderance or loss of VLOS. If the Remote Pilot operates the Unmanned Aircraft from a moving vehicle as a passenger, the speed and stability of the vehicle must be sufficient for the Remote Pilot to maintain VLOS and control of the Unmanned Aircraft at all times. Situations where the remote pilot is situated on a moving vehicle, and the vehicle may need to deviate from the intended flight path of the UA, such that VLOS is not able to be maintained, would place the operation outside the scope of PDRA01. The use of a manned aircraft to maintain VLOS is therefore not considered within the bounds of PDRA01.

iii) *The robustness of multiple mitigations are severely degraded by operating outside the bounds of the PDRA01 risk assessment. Including but not limited to:*

- *Remote pilots must reasonably expect that uninvolved persons will not be intentionally overflown. This cannot be risk assessed prior to flight due to the vast ground track of the proposed route, or dynamically during flight due to the speed of travel through the area of operations, distance from the ground, and the various other demanding tasks the flight crew must conduct reducing their ability to effectively perform this dynamic assessment in parallel with other roles and responsibilities.*
- *The UAS must be equipped with a mechanism that will cause it to land in the event of a disruption to, or a failure of, any of its control systems. Should a disruption to, or a failure of, any of its control systems occur during the proposed operation, the ground area within which it will land will almost certainly not be under the control of the remote pilot or flight crew, and therefore places 3rd parties at significant risk.*
- *The UAS operator's operations manual shall contain on-site procedures for site survey identifying hazards (e.g., proximity to third parties, roads, animals, traffic, aeronautical activities, and danger areas) and conducting additional risk Assessments (e.g., appropriate choice of remote pilot and proposed crew operating location to avoid slips, trips, and falls). The Operational Safety Case submitted for assessment by Electric Aviation Limited, and referenced on the PDRA01 Operational Authorisation issued contains no procedures that reflect the intended operation. However, even if the operator had provided evidence of written procedures, the operation still falls outside of PDRA01 and would not have been authorised."¹⁰*

55. This email warned that any Operator or Remote Pilot conducting operations outside of those permitted by the 'open' category or by a 'specific' category Authorisation, would be committing an offence under the Air Navigation Order 2016 Articles 265A and/or 265B. It asked for confirmation that the operation type referred to would not take place without a valid Operational Authorisation and warned that if the RPAS team had not heard back by 16 August 2023, it would be required to escalate the matter.

56. A response was received to this letter from Mr Ryan on 17 August 2023. This letter

¹⁰ Hearing bundle, Binder 2, pages C9-C10

asserted that:

- i) Dr Crockford/Aviation were operating a UAS in the Open category and therefore the application of PDRA01 was irrelevant.
- ii) Even if PDRA01 was relevant, the pilot complied with it (referring to the reference in PDRA01 to the possibility of a single unmanned aircraft observer to assist the remote pilot).¹¹

57. The letter also complained about the fact that the CAA had contacted the Chief Allied Health Professional and Healthcare Scientist of Morecambe Bay Health Authority directly, which had caused the NHS Trust to suspend the project. Dr Crockford also made a separate complaint to the CAA's complaints team about this. This complaint was forwarded to the CAA's Office of the General Counsel ('OGC') because it was not within the scope of the complaints policy (which states that matters where legal action is contemplated or has already been commenced would be forwarded to the OGC).

58. The OGC responded to Dr Crockford, copying in Mr Ryan, on 24 October 2023 addressing both the forwarded complaint and Mr Ryan's 17 August letter. The OGC rejected the complaint about the communication with the NHS Trust and stated that:

*"The CAA wrote to you on 11 August 2023 to ensure that you were aware of the limits of the scope of the OA that Electric Aviation Limited held and the consequences of operating outside the terms of, and therefore without, and approval. It is appropriate for a regulator to communicate with those who it regulates to offer this guidance and to conduct a dialogue."*¹²

59. Subsequently, on 5 April 2024, a representative of the RPAS team emailed Dr Crockford (at [REDACTED]) to seek an *"Informal conversation with you to talk about your ambitions in this space and how we can best support you achieve them we're particularly interested in hearing your views on the Bernstein and Leigh v Skyviews and General Ltd stated case and how that pertains to BVLOS [Beyond Visual Line of Sight] operations"*.¹³

60. Dr Crockford sent a detailed response dated 8 April 2024 (from the [REDACTED] email address) referring to the fact that he had spent two years working on medical drone collections and setting out various ways in which he considered that CAA could help his business, as well as his views on the Leigh case.¹⁴

61. The RPAS representative replied on 12 April 2024 asking two follow-up questions, including whether Aviation had been operating UAS in Morecambe Bay outside of any permissions afforded within an Operational Authorisation. Dr Crockford responded on the same day to state that he had an exclusive licence from the Duchy of Lancaster to fly *"BVLOS and VLOS any RPAS exclusively in the airspace above the Property along routes agreed in advance with the Surveyor...We flew VLOS only, predominantly in the Open Category, using PDRA01 for TOAL at Hospitals to reduce the distances to uninvolved persons accordingly."*¹⁵

62. On around 17 June 2024 Dr Crockford made a voluntary application at Companies House to strike Aviation off the register. According to Companies House records, Aviation was

¹¹ Hearing bundle, Binder 2, pages C13-C15

¹² Hearing bundle, Binder 2, page C18

¹³ Hearing bundle, Binder 2, page C22

¹⁴ Hearing bundle, Binder 2, pages C20-C22

¹⁵ Hearing bundle, Binder 2, pages C19

dissolved via a voluntary strike off on 10 September 2024.

63. On 5 September 2024 a different representative of RPAS requested by email from Dr Crockford (at [REDACTED] flight logs and any incident logs covering the last 12 months, as well as any site surveys from/to NHS sites and/or over Morecambe Bay since August 2023, and aircraft telemetry for a flight over Morecambe Bay that has an associated site survey and flight log entry. It appears that no response was received so a follow up email was sent on 17 September 2024 demanding access to the requested records pursuant to powers under UAS.SPEC.090¹⁶ (from the Annex to the UAS Implementing Regulation). The email pointed out that no response had been received to the request of 5 September 2024 and that failure to provide access to an authorised person was a criminal offence. It warned that if Dr Crockford failed to provide access to the documents, the CAA may consider prosecuting him.
64. This prompted a complaint (submitted on 17 September 2024) by Dr Crockford against RPAS and the employee who had sent the 17 September email. He stated that the relevant company had been struck off in September and that Dr Crockford ‘*had no link*’ to the company, being neither a director, employee or shareholder in Aviation. It complained of harassment because the queries and threat of prosecution were made to Dr Crockford’s personal email (i.e. [REDACTED]) address rather than to the company. This became complaint 24/067.
65. On 10 October 2024 RPAS sent another email to Dr. Crockford reiterating the obligation to provide access to the requested records and setting a final deadline of 18 October 2024, with a warning that the matter may be referred to the CAA Investigations and Enforcement team if not complied with.
66. On 11 October 2024, Airshows applied for renewal of its Operational Authorisation.
67. A response came from Mr Ryan (to whom Dr Crockford had presumably passed the correspondence) on 18 October 2024 referring to the fact that Aviation had been dissolved and claiming that it was not possible for Dr Crockford to comply with the request for documents. The letter sought confirmation that no further action would be taken in respect of the dissolved company, and that if documents were sought from Dr Crockford in his personal capacity then the legal basis for doing this should be specified. The letter sought a response within 14 days.
68. The CAA responded to Dr Crockford (copying Mr Ryan) on 7 November 2024 pointing out that the request for documents was made before Aviation was dissolved but in any event there was an obligation in UAS.SPEC.050 (and in PDRA01) on the operator to retain records for three years, and Dr Crockford as the accountable manager was responsible for ensuring that all Aviation’s activities were carried out in accordance with the applicable requirements and regulations. The letter concluded that Dr Crockford’s failure to provide access to the requested material failed to assure the CAA that he was an accountable person and that:

“This approach of failing to engage with the regulator in meeting one’s statutory requirements within the UAS framework leaves a question over whether the CAA can satisfy itself that it’s Article 12 of UK Regulation (EU) 2019/947 obligations can be met nor whether any future operations will be fully complied with.”

¹⁶ UAS.SPEC.090 states “For the purpose of demonstrating compliance with this Regulation, an UAS operator shall grant to any person, that is duly authorised by the CAA , an access to any facility, UAS, document, records, data, procedures or to any other material relevant to its activity, which is subject to operational authorisation [...], regardless of whether or not its activity is contracted or subcontracted to another organisation.”

The CAA must have the ability to oversee those it regulates and remains concerned at this time that in relation to your activity it is unable to satisfy the requirements the State has authorised it to oversee and enforce to ensure continued aviation safety.”¹⁷

69. Mr Ryan (on behalf of Dr. Crockford and Airshows) responded to the OGC on 21 November 2024 complaining that (as he said) there had been no substantive response to the letter of 17 August 2023 (concerning the communication with the NHS Trust). It also objected to any direct communications with Dr. Crockford (requesting all correspondence be routed through Mr Ryan) and complained about delays in the renewal of Airshows' Operational Authorisation.
70. Mr Ryan also wrote to the OGC and the CAA's complaints department on 4 December 2024 requesting that complaint 24/067 be escalated to the Independent Complaints Assessor for an impartial review. The letter stated that despite Mr Ryan requesting that all emails be routed via him, the CAA had continued to send direct correspondence to Dr Crockford's personal email address. Complaint was also made of 'harassment' by the RPAS team, the lack of response to the 17 August 2023 letter and the delay in granting an Operational Authorisation to Airshows.
71. The RPAS team raised an oversight report in relation to Airshows' Operational Authorisation application dated 12 December 2024, which was sent to Dr Crockford by email the following day. This made a level 2 finding that *"the organisation has failed to provide sufficient assurance of their ability to demonstrate compliance with the requirements of UK Regulation (EU)2019/947 Article 11 para 2(e) in relation to the Accountable Manager"*. The covering email stated that RPAS was not satisfied that Dr Crockford was of suitable competence to hold the role of Accountable Manager because of his failure to provide logs and records for a company of which he was an accountable manager (i.e. Aviation). The email also stated that RPAS wanted to offer a pathway to resolve the issue, whereby Dr Crockford supplied the requested logs and records in respect of Aviation and attended an interview with an Inspector at the CAA who would remind him of his duties and obtain confidence that the requirements would be followed moving forward.
72. On 16 December 2024 Dr Crockford sent an 'open letter' to the CAA expressing his concern at the failure to renew Airshows' Operational Authorisation. He referred to the request for information on 5 September 2024 and noted that *"there were no flights during the time period requested, owing to the tortious interference, by the RPAS team in August 2023, that had halted Specific category flights"*, also claiming that technically the request was never made (because of issues concerning service of documents on a company).
73. On 17 December 2024 Mr Ryan sent an email confirming that Dr Crockford would not be providing the documents requested, since the company had been struck off and also the request had not been 'served' properly on it so no request had been made. The email went on to state that Dr Crockford would also not be attending an interview with RPAS because the Inspectors for Swarm Drone Operations were not competent persons:

"We evidence this with regards the initial Electric Airshows Level 2 finding RPAS.MTG.3 which detailed that "Air Traffic monitoring radio was seen to be turned down but not seen to be turned back up again. When questioned the reply was that it was turned down because at that point it was a distraction." None of the inspectors present possessed a Flight Radio Telephony Operators Licence, unlike my client, and as such the inspectors did not display a competency that warranted such a Level 2 finding. As such my client

¹⁷ Hearing bundle, Binder 2, page C35

has grave concerns regarding the competency of the Inspectors.”¹⁸

74. From 23 December 2024 there followed further exchanges between the CAA complaints team and Mr Ryan/Dr Crockford in which the CAA continued to seek a face-to-face meeting with both senior staff and the RPAS team to discuss the issues raised. However, by an email dated 29 January 2025 Mr Ryan stated that he did not consider such meetings to be appropriate at that time.
75. On 7 February 2025 the CAA wrote to Dr Crockford¹⁹. That letter said that the offer of a meeting remained open because it was the CAA’s view that a meeting remained an effective way of resolving the issues. The letter – which was 14 pages long – dealt with many outstanding issues including:
- i) The reason why the CAA had concluded that its correspondence needed to be addressed to both Mr Ryan and Dr Crockford, and the alleged concerns about the use of Dr Crockford’s personal email address.
 - ii) The request for a Reg 6 review in relation to Airshows’ Operational Authorisation application. The letter stated that *“The CAA encourages Dr Crockford or Mr Ryan to suggest any alternative means by which we can resolve the queries that it has, close the finding and progress Electric Airshows’ application. That is the CAA preferred course and, as we have set out in our correspondence dated 23 December 2024, we are open to means by which we can address Dr Crockford’s concerns and progress electric air shows application”*. The letter stated that if Dr Crockford did not wish to propose means by which the CAA could be satisfied, then steps could be taken to progress the Reg 6 review.
 - iii) Substantive responses to queries and concerns in various letters and emails including Mr Ryan’s letter dated 17 August 2023 (answered by the letter of 24 October 2023), Dr Crockford’s email dated 25 October 2024, Mr Ryan’s letter dated 21 November 2024, Mr Ryan’s letter dated 4 December 2024, Mr Ryan’s letter dated 13 December 2024 and Mr Ryan’s emails of 17 December 2024, 7 January and 29 January 2025.
 - iv) The letter also (at page 8) made the point that the CAA still did not understand how the flights in relation to the Morecambe Bay project could be operated in the Open Category, but wanted to understand this and let Dr Crockford know that they would like to discuss it.
76. On 11 February 2025 Dr Crockford apparently asked for his complaint to be escalated to the Department for Transport’s Independent Complaints Assessor.
77. Dr Crockford emailed the CAA on 14 February 2025 to inform them that he had submitted a complaint to the Solicitors Regulation Authority for lack of professional courtesy (because he said the OGC failed to respond to his lawyer’s letters).
78. In February and March 2025 Dr Crockford also made various Freedom of Information Requests to the CAA, and received documents, some of which were redacted.²⁰
79. On 17 March 2025 the CAA provided a further long letter of response to the emails of 11 and 14 February 2025. In particular that letter provided a further detailed explanation as

¹⁸ Hearing bundle, Binder 2, page C51

¹⁹ Hearing bundle, Binder 3, pages D88-D101

²⁰ For some examples, see hearing bundle, Binder 3, D650-D654 and D679-D681 and see page D104 for a letter which refers to further FOI requests

to why Airshows' application for an Operational Authorisation had not been granted by reference to the UAS Implementing Regulation and the FOCPF. The letter reiterated that it remained the CAA's view that a meeting was an effective means of addressing Dr Crockford's concern and enabling the on-going application to be concluded as quickly as possible.

80. However that offer was not taken up and by letter dated 7 April 2025 the CAA notified Dr Crockford of the decision to refuse Airshows' application dated 11 October 2024 for an Operational Authorisation, formally commencing the Reg 6 review process. That letter recorded that the RPAS team had set a target date of 11 March 2025 to resolve the finding in the oversight report of 12 December 2024, but the finding had not been resolved in time.
81. On 21 April 2025 Dr Crockford informed RPAS that he had renewed Airshows' Operator ID. In this regard, it appears that the CAA's DMARES system sent Dr Crockford an automated message on 27 March 2025 reminding him that his UAS Operator ID was due to expire, and invited him to renew it online.²¹
82. On 22 April 2025 a video featuring Dr Crockford and a number of other individuals was livestreamed and posted on the internet, in which Dr Crockford indicated that he would continue not to engage with RPAS. In relation to the Morecambe Bay project he stated the following:
 - i) *"we managed to fly 1260 kilometres of flight predominantly in the open category"*²²
 - ii) *"Well, there wasn't any flights to or from NHS sites or over Morcambe Bay [sic] in the specific category because you just derailed them in August of 2023 and obviously they went to the aircraft telemetry for a flight over this fictitious place called Morcambe [sic] spelled with two O's and associate site survey and flight log entries but you know they unfortunately they sent it to me personally. It's not talking about which company they want it from."*²³
 - iii) [in relation to the request for a Reg 6 review] *"I've asked for it. I've said you know let's go straight to it and they said no you have to follow process because they found a level two finding that I may not be you know an accountant I may not be competent to be an accountable manager. They have said that and so because I didn't respond to them. I didn't go and see them get lectured [at] by an inspector. Um, there's a reason I didn't go and see the inspector actually because, and I'll get to that in a minute, but I decided not to do that, not to follow their pathway forward. And in fact, the CAA, blessed them, have offered me time with a senior manager from the CAA. But I've just like I've just had enough. It's like, no, look, seven complaints in seven years. This is not getting anywhere. You're not changing."*²⁴
 - iv) *"our longest flight was 76 kilometres, but we did that from a chaperone aircraft. So, we basically flew the in the open A3 category. we could stay over Morecambe Bay where we could remain 150 meters away from any uninvolved persons with the tide coming in or going out and we did it from a chaperone aircraft".*²⁵

²¹ Hearing bundle, Binder 3, page D691

²² Hearing bundle, Binder 2, page B478

²³ Hearing bundle, Binder 2, page B481

²⁴ Hearing bundle, Binder 2, page B486

²⁵ Hearing bundle, Binder 2, page B488

- v) *"we're working on some stuff at the moment which we think is mind-blowing and really good fun and you'll see you know there'll be more about that later in the year but you know trust me it's going to be flown in the open category in the UK."*²⁶
83. On 8 May 2025 SARG proposed by letter to suspend the Operator ID of Airshows and the Operator and Flyer ID of Dr Crockford, and also provisionally suspended the Operator ID of Airshows and the Operator and Flyer ID of Dr Crockford (see also the SARG email of 14 May 2025).
84. This letter, which originally stated that Dr Crockford was not to operate any UAS as a Remote Pilot in the UK, was subsequently reissued on 27 May 2025 to qualify that statement (since it would be permitted for him to fly a drone weighing under 250g in certain circumstances).
85. On 22 May 2025 Dr Crockford swore a statutory declaration in which he confirmed that he had not acted as a Remote Pilot or supervised any UAS operation since December 2024. As regards the requests for documentation from Aviation he stated that:
- "4.1 Electric Aviation Ltd was struck off on the 3 September 2024 and dissolved on 10 September 2024 pursuant to a voluntary application filed on 13 June 2024.*
- 4.2 Non-standard requests for logs and records of Specific category flights were received on the 5 and 17 September 2024 to my personal email address and contained no reference to any specific organisation. Both emails contained multiple typographic errors and did not look authentic. (I later confirmed these emails do not comply with the Civil Aviation Authority Email Standardisation Training guide) The second email threatened me with Criminal Prosecution. I did not reply and on the 18 September 2024, I raised complaint 24/067 for harassment.*
- 4.3 On the 10 October 2024, a third email was received threatening to pass the matter to enforcement if I did not supply the logs and records requested. This email referenced Electric Aviation's dissolution, but did not specify whether company or personal records were sought.*
- 4.4 On the 17 August 2023, Mr Ryan informed the Civil Aviation Authority, post a potential breach of Article 23 of the Civil Aviation Act 1982 that "any intra hospital flights are now not able to take place because of the unauthorised and unwarranted communication by the CAA." It is for these flights, which did not take place, I believe the requests are for.*
- 4.5 On the 13 December 2024, I wrote to the Chief Executive of the Civil Aviation Authority and informed him "There were no qualifying flights in the time period requested": I stand that I have fulfilled my obligations to respond to the requests."*
86. RPAS responded to this on 10 June 2025 summarising its continued concerns about the information provided:
- "Notwithstanding all the information you have provided (including in your Statutory Declaration) you have not been clear and frank with us, and we are not able to conduct our ongoing safety oversight dialogue in the manner that is necessary to ensure a high standard of safety. We have had to spend considerable time trying to piece together information and work out what you mean. That information is sometimes in correspondence other than with the sector team and sometimes from you and sometimes*

²⁶ Hearing bundle, Binder 2, page B490

from your legal representative.

(a) We do not understand how there can be no flights as you have posted videos of flights.

(b) If flights did take place, we do not understand how these flights could be solely in the open category, noting our understanding of the take-off and landing sites.

(c) If the flights did take place, and if the take off and landings were conducted under a PDRA01 we do not understand how there are no flight logs:

a. We note that our request for documents was made on 5 September 2024, for the previous 12 months. We recognise that this was therefore a request for logs from 5 September 2023 – 4 September 2024.

b. We note that the Electric Aviation's PDRA01 was issued on 20 July 2023

c. Are you telling us that there are no logs from 5 September 2023, but there are logs 20 July - 4 September 2023?"²⁷

87. That letter also asked specifically for confirmation that all of the flying that took place as part of the Morecambe Bay project (whether in the 'open' or 'specific' category) took place before the start date of the document request (i.e. between 20 July 2023 and 4 September 2023). It also confirmed that the CAA's view was that VLOS UAS operations could not lawfully be carried out from a following aircraft within the 'open' category and sought confirmation that neither Dr Crockford nor any company of which he was a director or an accountable manager would operate a VLOS operation in that way. The covering email sent with that letter stated that SARG very much hoped that Dr Crockford would agree to meet with the CAA for the reasons set out in the letter.
88. The response from Mr Ryan dated 27 June 2025 asked the author of the 10 June 2025 letter to recuse himself and made various other complaints, including of harassment. However, it did not answer the questions posed in the 10 June letter.
89. For completeness, it should be noted that two further reviews have taken place, at Dr Crockford's request:
- i) On 20 June 2025 the Report by the Independent Complaints Assessor for the Department for Transport in respect of complaints made by Dr Crockford, including in respect of harassment by members of the RPAS Team, was completed and sent to Dr Crockford and the CAA. The complaints by Dr Crockford were not upheld, although the harassment complaints were judged to be out of scope.
 - ii) On 24 June 2025 the CAA Safety Decision Internal Review of the decisions to suspend Dr Crockford's Operator and Flyer IDs was completed. This review concluded that the RPAS team followed the CAA's policies and procedures when making the suspension decisions dated 8 May 2025.
90. On 1 September 2025 it appears that the ownership and control of Electric Airshows was transferred from Dr Crockford to a third party.
91. For the avoidance of doubt, the Panel has taken into account all of the documents and written representations made by and on behalf of both parties, and while it does not repeat

²⁷ Hearing bundle, Binder 2, page C69

all of the submissions in full in this decision letter, the written and oral submissions and evidence were considered in their entirety.

SECTION D: SUBMISSIONS ON BEHALF OF SARG

92. SARG submitted that Dr Crockford was an intelligent and well-resourced individual who was well able to communicate properly with the CAA when it suited him, including when raising complaints against the manner in which the CAA had dealt with him. SARG's essential complaint was that Dr Crockford has failed to engage with its requests for information about the flights taken as part of the Morecambe Bay project and that, as a result, it still does not understand what flights took place and when, and whether those flights were properly within the scope of Aviation's permissions.
93. The particular failures that SARG highlighted were:
- i) Failure to respond to concerns about potential flights, including on 11 August 2023 and 7 February 2025;
 - ii) Refusing to confirm whether or not flights had taken place;
 - iii) Failure to produce records when requested, including on 5 September 2024, 17 September 2024, 10 October 2024 and 13 December 2024; and
 - iv) Refusal to meet with CAA personnel so that concerns could be discussed and clarified, including on 5 April 2024, 13 December 2024 and 7 February 2025.
94. As to the legal basis for its approach, SARG submitted as follows:
- i) Aviation safety is at the heart of the functions of the CAA: see section 3 of the Civil Aviation Act 1982.
 - ii) Articles 11(2)(e), 5(f) and 6 of the UAS Implementing Regulation include requirements for the consideration of the competence and suitability of the individuals involved in any organisation making an application for an Operational Authorisation in respect of a UAS.
 - iii) Specifically in relation to the Operator ID and Flyer ID, SARG pointed to the general power of the CAA to refuse, suspend or revoke permissions in Article 62(d) of the Basic Regulation (paragraph 24 above), noting that this was one of the principal ways in which the CAA carried out its overarching duties in relation to aviation safety.
 - iv) As it was put in oral submissions by SARG, "*Individuals set the culture and it is individuals that the regulator has to have trust in*", and it was Dr Crockford who was the relevant individual in respect of all of the organisations under review.
 - v) As part of considering the suitability of individuals, SARG considers the Fitness of Character Policy Framework (the '**FOCPF**' as described in paragraphs 34 - 35 above). This sets out basic and common-sense standards which would be required by many regulators, although in the context of aviation regulation the need to protect the general public and evidence relating to aviation safety were of central importance to the assessment.

- vi) As the FOCPF made clear, the CAA must consider intervention when it appears that that an individual may no longer have the appropriate fitness of character; the CAA's powers to intervene are discretionary and the circumstances in which it may do so are not proscribed in advance. The principles in the FOCPF were 'woven into' the assessment the CAA was obliged to conduct as to the competence of an individual when considering whether the statutory tests were met (especially in Article 11(2)(e) of the Implementing Regulation, but also in relation to the requirements for Flyer and Operator IDs in relation to which the statutory oversight was arguably less demanding).
- vii) Even though the role of 'accountable manager' did not have a formal legal basis in the Implementing Regulation, it was a concept well-known to regulated entities, was referred to specifically in the CAP 722D glossary in the context of UASs, and was also a term widely adopted by Aviation in its operations manual version 2.0 (which formed part of the application for the Operational Authorisation). Dr Crockford was named as the responsible individual in various places in the relevant documentation for both Airshows and Aviation.²⁸

95. SARG argued that there was no need for it to point to a specific incident during which safety had arguably been compromised, and it was reasonable for it to act in circumstances where it was unable to be satisfied about the nature and safety of the operations conducted by the Applicants. In this regard, it highlighted the following:

- i) The operations manual was very clear about the need to keep records of flights, as was Aviation's Operational Authorisation.
- ii) The operations manual made no mention of the possibility of conducting UAS flights from a manned chaperone aircraft.
- iii) SARG made it clear as early as 11 August 2023 that it did not consider that conducting UAS flights from a manned chaperone aircraft fell within the scope of Aviation's permissions (because it was not an 'open' category flight) and fell outside the scope of the Operational Authorisation for the 'specific' category (also being nowhere mentioned in the risk assessment that accompanied that application). In any event Dr Crockford was aware of the CAA's position as regards such flights because he had submitted an airspace change request in this regard which had not been granted.²⁹
- iv) SARG had asked a series of questions designed to understand what flights had been carried out in what circumstances but Dr Crockford had refused to answer them, or had given confusing and contradictory answers.
- v) One example of contradictions was that Dr Crockford had stated that no flights were able to take place because of the CAA's questions to the NHS Trust in August 2023. However, a comparison of slides shown at the Future Flight Challenge conference in December 2023 (which indicated that the project had flown 841 kilometres) with the project's own website (which indicated that the project ran until March 2024 and flew 1260 kilometres) suggested that further flights did take place.
- vi) The documents revealed other matters which concerned SARG, including

²⁸ For example, see Airshows' Operations Manual in the hearing bundle, Binder 2, page B137

²⁹ There was a dispute between the parties, which did not need to be resolved, as to whether this was refused by the CAA or withdrawn by Aviation.

(i) the reference on the website to Aviation having developed “*full BVLOS flight capacity*”; and (ii) the reference on the Future Flight Challenge conference slides to the ‘longest flight’ being 76km. However the CAA was unable to obtain any further information from Dr Crockford about this.

- vii) Dr Crockford had continually refused to meet with representatives of RPAS/SARG to discuss the issues raised.
- viii) The risks identified were that as Dr Crockford was not engaging with RPAS/SARG he would fly UAS outside of the authorised parameters (in particular SARG’s view was that flying a UAS from an escort or ‘chaperone’ aircraft was beyond the scope and spirit of the ‘open’ category). Flying of UAS outside these parameters potentially creates serious safety risks to those in the air and on the ground.
- ix) Ultimately, SARG submitted that despite all the hundreds of pages of correspondence that had passed between the parties, it was still unclear as to what flights had been conducted by Aviation and Dr Crockford as part of the Morecambe Bay project.

96. SARG also rejected the submission that its responses were either disproportionate or inconsistent:

- i) SARG had not made a ‘knee-jerk’ reaction, and indeed had permitted Airshows’ Operational Authorisation to be renewed in October 2023 after the initial concerns were raised in August 2023. When it made requests for information which were not answered, it did not then immediately refuse Airshows’ renewal in October 2024 but instead produced an oversight report which gave Airshows and Dr Crockford the opportunity and time to satisfy the CAA as to its questions and concerns (which was not taken). The final decision was not taken until 7 April 2025, which showed “*considered and proportionate responses*”.
- ii) The decisions in relation to the Flyer ID and Operator ID of Dr Crockford himself and the Operator ID of Aviation and Airshows had been kept under review pending the communications following the oversight report, and as at 7 April 2025 no decision was taken about these since it was believed that the Applicants were not currently operating UASs and were not likely to in the future. However, subsequently SARG became aware of the livestream/YouTube video from 22 April 2025 (paragraph 81 above) which, among other things indicated an intention not to engage with the regulator, and an intention to operate UASs in the near future. That led SARG to take action in relation to the Flyer and Operator IDs at that point.
- iii) The decision was made only to suspend (rather than revoke) Dr Crockford’s permissions and the Operator ID of Airshows because it was hoped that the failure to engage with the CAA could be remedied within a reasonable time period. Six months was suggested, following which the period would be considered further. This was also, therefore a proportionate and reasonable response.
- iv) There was no inconsistency with the fact that Dr Crockford retained his regulatory permissions in relation to manned aircraft PPL because SARG was concerned with Dr Crockford’s truthfulness and propensity to obey the rules in relation to drones. SARG in any event noted in its written submissions that it was keeping Dr Crockford’s PPL under review as part of

its role of continuous oversight of aviation safety.

SECTION E: SUBMISSIONS ON BEHALF OF THE APPLICANTS

97. On behalf of the Applicants, Dr Crockford fundamentally rejected the submission that he has failed to engage with SARG. In this regard, he argued as follows:
- i) SARG had itself originally been at fault in contacting the NHS Trust directly in August 2023, which he described as “tortious interference” with Aviation’s business.
 - ii) The initial email from SARG dated 5 September 2024 seeking information was sent to Dr Crockford’s email address but not addressed to any particular legal entity.
 - iii) Insofar as the emailed requests for documents were addressed to Aviation, that company was struck off the register of Companies House on 10 September 2024 and therefore the requests were ineffective.
 - iv) SARG’s email of 17 September 2024 had threatened Dr Crockford with criminal prosecution and therefore he was entitled to be represented by a lawyer and, moreover, to insist that all communications be routed through his lawyer (and, it seems, not addressed to him at all).
 - v) Mr Ryan had sent various letters to SARG which were either not answered at all or not answered promptly. Rather than Dr Crockford (or his representative) failing to engage with SARG, the true position was the reverse. Dr Crockford also pointed to his sworn statutory declaration as evidence of his provision of information to SARG.
 - vi) Equally, Dr Crockford complained that requests for information had not been addressed to Mr Ryan rather than himself. What he described as a failure to respond properly to Mr Ryan was said to contravene CAP 1326 (the regulatory enforcement policy) under which the CAA said it would respond professionally, courteously and in a timely manner.
 - vii) SARG’s queries had been adequately answered, including because there were no documents falling into the category first requested on 5 September 2024 (flight logs and incident logs from flights flown in the ‘specific’ category over the previous 12 months).
 - viii) It was reasonable for Dr Crockford to refuse to meet with individuals from SARG in circumstances where he had an ‘ongoing’ harassment complaint against individuals within SARG.
 - ix) Dr Crockford also argued that his complaints had not been properly handled by the CAA.
98. Dr Crockford also objected to the application of the FOCPF to the Applicants, given that the references to fitness of character had been removed from the relevant policy document (CAP 772) in force from May 2023 to March 2025 (edition 4), although this had subsequently been re-introduced in edition 5 from 3 March 2025. More fundamentally, he complained that there was no published standard against which UAS ‘competence’ was to be judged and in particular there was nowhere in the UAS publications an assessment matrix, a skills experience threshold, a scoring rubric or an approval pathway (in contrast to manned aviation where such documents and standards were well-developed). The

definition of 'accountable manager' in CAP 722D did not set any measurable standard by which competence could be judged.

99. As to the arguments about flight safety, Dr Crockford responded as follows:

- i) He said there was no evidence that flight safety had ever been compromised, and no contemporaneous risk assessment identifying the safety risk. As Dr Crockford put it, SARG's finding rested on "*administrative disagreement not operational safety*". This was also said to be contrary to the policy (from CAP 1326) to adopt a proportionate, risk-based approach.
- ii) Dr Crockford also submitted that there was no question that the operations conducted over Morecambe Bay were safe and also legitimately conducted in the 'Open' category. There was no law which stated that drone flights could not be operated from a manned aircraft and indeed the CAA's own AMC referred to the possibility of operating drones from a boat or a moving vehicle within the 'Open' category. Aviation also had an exclusive licence from the landowner to conduct the flights over Morecambe Bay.

100. During the course of the hearing Dr Crockford explained that four flights had taken place in the 'specific' category on 23 August 2023 for the purposes of filming at the two NHS sites. These had not involved flying across Morecambe Bay. Dr Crockford brought the relevant flight logs with him to the hearing. He refused to provide them at the hearing, but subsequently offered to supply them to SARG (as explained below).

101. Dr Crockford also pointed to what he said was the irrational inconsistency between his retaining his pilot's licence which permitted him to fly manned aircraft up to 5.7 tonnes while at the same time not being permitted to fly drones weighing more than 250g. He also questioned why the DMARES system had invited the renewal of Operator and Flyer IDs after SARG had raised questions in Autumn 2024 around Dr Crockford's fitness to be an accountable manager.

102. Dr Crockford complained that the CAA was guilty of 'regulatory overreach' in the following ways:

- i) In 'suspending' Aviation's authorisations in 2024 by reference to a 'competence' standard but by March 2025 this had been re-branded as 'fitness of character'. This was said to be a retrospective reclassification of the underlying issue which might be procedurally unfair.
- ii) In prematurely threatening prosecution without proper evidence and ignoring legal correspondence.
- iii) In first issuing a blanket ban on Dr Crockford flying any drones and then having to correct that position since as a matter of law even without a valid flyer ID Dr Crockford was entitled to fly drones of less than 250g with no camera.

103. Dr Crockford also pointed to occasions on which he had engaged pro-actively with the CAA including where he had notified the CAA that a website page in relation to CAP 722 was not functioning properly and volunteering that a drone fleet had been grounded due to battery issues. He also relied on various letters of support from individuals and entities in relation to his work in the UK drone industry.

104. As regards the revocation of Aviation's Operator ID it was pointed out that this had expired on 12 May 2025 and since Aviation was now dissolved and no longer existed as a legal

entity any purported revocation was ultra vires and a nullity. Dr Crockford also confirmed that he would not resurrect Aviation and would not try to fly under that legal entity ever again³⁰.

SECTION F: APPLICANTS' DISCLOSURE AND INFORMATION REQUESTS

105. The Reg 6 review process is not equivalent to litigation in court and the Panel does not have any power to order either side to produce documents. The Panel has nevertheless considered the submissions regarding the Applicants' disclosure requests with a view to indicating whether it considers that SARG should be requested to answer them. This decision was taken following the Panel's consideration of the hearing bundles and the submissions made at the hearing, in accordance with the indication given prior to the hearing.
106. By letter dated 26 August 2025 Mr Ryan asserted that "*there are live questions about who held authority to make the decisions and how internal responsibilities were allocated*" and said they sought the following:
- i) The 'management/authority matrix and any delegations' in force at the material times showing who could lawfully take decisions and issue notices under Reg 6(2).
 - ii) Confirmation that the RPAS employee who issued the suspension letters had authority to do so (and provide the relevant instrument or internal delegation).
 - iii) The formal authority to issue the information demands in September/October 2024, together with any notes, internal emails or instructions guiding the making of such demands; the statutory basis for those requests; the current management and delegations matrix within SARG and RPAS.
 - iv) Confirmation that the information requests related to the operation of the Morecambe Bay Medical Shuttle Phase 2, and an explanation as to why SARG waited 158 days post project closure before asking for flight records.
 - v) An explanation as to why the threat of prosecution and threat of referral to the IET was made and on what basis, together with the "*contemporaneous record*".
 - vi) An explanation as to why the (legally incorrect) statement was made that Dr Crockford must not operate a UAS in UK airspace was made, together with the "*contemporaneous record*".
 - vii) An explanation for the inconsistency between the DMARES system inviting renewal of IDs at the same time as SARG was questioning competence and pursuing revocation.
107. A similar set of documents was also sought in an email from Mr Ryan of 26 August 2025, to which SARG responded on 4 September 2025. That email also sought particulars of the "critical safety" issues relied upon and copies of any contemporaneous risk assessment/analysis and internal decision records/minutes.
108. As regards the first request in relation to "*the management/authority matrix and delegations in force at the material times*", SARG pointed to CAP 2552 which reproduced

³⁰ Hearing transcript, page 116, lines 8-10

a CAA Board Resolution from 1972 in the following terms:

“any person who is for the time being a member, officer or servant of the Authority be authorised to perform on behalf of the Authority any of its functions and to act on behalf of the Authority in all matters, being functions or matters which in the case of an officer or servant of the Authority fall within the usual scope of his duties as such.”

109. In this regard, Regulation 6(2) provides (in summary) that any decision to grant, refuse to grant, validate, refuse to validate, revoke, suspend, vary or refuse to vary a certificate, licence, approval, authorisation, or rating may be made by the Authority only by a member or employee of the Authority.

110. SARG also explained in its response that the DMARES renewals of the Operator and Flyer IDs happened before it became aware of the further information that came to light on 22 April 2025 (see further paragraph 128 below). As to the request relating to ‘critical safety issues’, SARG explained that:

“Aviation safety requires individuals to operate within the relevant parameters and when concerns are raised as to whether this is taking place to engage with the regulator. A failure to operate within such parameters in the context of aviation safety by its nature raises critical safety issues. The CAA still does not have an understanding as to what flights were taking place in what manner and when due to Dr Crockford’s lack of engagement and therefore can have no confidence that he has operated or will operate safely.”

111. The remaining requests were rejected by SARG on the basis that they were not relevant to the decision for the Panel.

112. Having considered the issues and the submissions carefully, the Panel was not persuaded that SARG should be asked to produce further documents:

- i) The Panel was most concerned, in this Reg 6 review, with the communications and engagement between SARG and the Applicants since it was these which were key to understanding whether (and/or why) Dr Crockford may have failed to engage with SARG. However, it had not been explained why the documents or information sought were relevant to that issue or bore materially on the decisions for the Panel.
- ii) Requests (ii), (iii) (v) and (vi) were further requests relating to the internal authorisation of SARG or internal SARG correspondence relating to the sending of letters. The answer already given by SARG explained the general authority given to employees of the CAA, and in any event the Applicants had not (or not seriously) suggested that any CAA employees had actually acted outside the scope of their authority.
- iii) As to request (iv) it seems clear that the request did relate to the Morecambe Bay project, and that was the basis on which the parties proceeded at the hearing. While there was a delay between the end of the project and SARG seeking further information in September/October 2024 about the flights taken it did not seem critical to the Panel to receive chapter and verse on why.
- iv) As to the documents relating to a “contemporaneous risk assessment”, SARG had confirmed there was no risk assessment associated with the 8 May 2025 letter concerning suspension/revocation.³¹ SARG had now

³¹ Hearing bundle, binder 3, page D717

provided detailed justifications of its proposals and decisions which were set out in party-to-party correspondence, written submissions and oral arguments at the hearing, and it was not necessary to examine the underlying contemporaneous documents.

SECTION G: DISCUSSION AND DETERMINATION OF THE QUESTIONS FOR THE PANEL

The central question of failure to engage

113. At the heart of all four questions for the Panel is the issue of whether Dr Crockford has failed and is failing to properly engage with SARG.

114. The Panel is satisfied that there is clear evidence that Dr Crockford has consistently failed to engage properly with SARG:

- i) The queries about what flights had been conducted pursuant to the Morecambe Bay project were clearly reasonable questions to ask in light of the potential safety risk associated with flying UASs and, more specifically:
 - the safety concerns about flying UASs from manned aircraft which were not confined to SARG but shared by the air traffic services manager employed by BAE Systems referred to above; and
 - the fact that the possibility of such flights was not mentioned in the risk assessment that accompanied Aviation's application for an operational authorisation or in its operations manual.
- ii) Dr Crockford's responses to SARG's enquiries were incomplete, inconsistent or failed to answer the question. As a result, after nearly two years SARG still did not know the detail of the flights conducted, such that they could not understand properly what flights had been (legitimately) conducted in the 'open' and in the 'specific' categories.
- iii) Mr Ryan's letter of 17 August 2023 in response to SARG's initial inquiry asserted that Aviation was operating in Open Category and so fully compliant with the Operational Authorisation, with no description or clarification of the flights. However, Dr Crockford later said (on 14 April 2024) that "*we flew VLOS only predominately in the Open category using PDRA01 (ie Specific) for TOAL at hospitals*" (emphasis added).
- iv) The responses from Dr Crockford and Mr Ryan to SARG's requests of 5 and 17 September 2024 for information including flight logs included a clear refusal to provide the logs but with confusing reasons (see paragraph 73 above). Three reasons seem to have been given: i) Aviation no longer existed so had no obligation to provide any documents; ii) the flights were in the 'open' and not 'specific' category (the subject of the request) although Dr Crockford and Mr Ryan later agreed that there were some flights in the 'specific' category; iii) no flights took place because they stopped after SARG's CAA letters in August 2023.
- v) Indeed Dr Crockford's complaint in response to SARG's request for flight logs made on 17 September 2024 (paragraph 64 above) was also arguably misleading in asserting baldly that he had 'no link' with Aviation when (i) he was a director of that company which had only seven days earlier been struck off the register and (ii) he was also the owner and controller of Digital and Future Technologies Ltd which was the sole shareholder of Aviation.

- vi) Despite being asked to do so on many occasions, at no time did Dr Crockford or his legal representatives clearly set out what flights he had been conducting and when, or explain what had been going on regarding the flights in relation to the Morecambe Bay project. SARG had consistently (i) asked for clarification as to what flights had been conducted in the 'specific' category and (ii) indicated that it did not consider that flights could legitimately be conducted in the Open category from a manned aircraft, and that it wished to discuss these matters with Dr Crockford. These were reasonable requests which were declined, ignored, or only partially answered and Dr Crockford has consistently failed to provide answers to the regulator's concerns.
- vii) Dr Crockford continued this approach at the hearing. His approach was to try to find flaws in SARG's requests and he declined to clarify what flights he had conducted. He was combative rather than cooperative. Indeed he showed no regret at the position in which he now finds himself and no indication at the hearing that he wished to resolve it by providing the information sought.
- viii) At the hearing, Dr Crockford clarified for the first time that four flights had taken place in the 'specific' category on 23 August 2023 and said that he had brought the flight logs to the hearing. However he declined to hand them to SARG at the hearing. After the hearing, he contacted the RPL and said that on reflection he was prepared to supply these logs. In the Panel's view this late provision of the logs, while welcome, does not alter the fact of his previous non-cooperation. Not does it amount to the proper clarification and reassurance that SARG seek. (The Panel deals below with the opportunity now available to Dr Crockford to start engaging with SARG further in this regard). There remains uncertainty about what flights were conducted, when they were conducted and the overall number (see paragraph 95(v) concerning the numbers of flights flown, for example).
- ix) It is no answer for Dr Crockford to claim that he was justified in not engaging because the initial requests were technically for 12 months of flight logs (and those flights in August 2023 just fell outside the 12 month period). SARG made it clear that it was seeking to open a dialogue to understand what operations had been conducted (in any event subsequent correspondence such as the 10 June 2025 letter specifically asked about records of flights in the pre-September 2023 period which, it now appears, clearly existed and could have been supplied).
- x) The chronology set out above shows that SARG consistently offered meetings with Dr Crockford to resolve the issues but these were consistently refused by him. The reasons for refusing a meeting varied from asserting that a meeting was 'not appropriate' or that Dr Crockford was not prepared to meet with personnel he had accused of harassment, to complaints about the competence of the Inspectors for Swarm Drone Operations (paragraph 73 above).

115. At times at least in his written submissions Dr Crockford appeared to go some way towards accepting that he had failed to engage with SARG. He described himself as adopting a "*strictly defensive posture, responding only to the letter of the law*", and referred to his "*withdrawal from proactive engagement with the CAA*".³² His main argument in this regard was really that he was justified in not engaging or engaging fully with SARG because (i) the request for documents relating to Aviation was invalid because that company had

³² Hearing bundle, Binder 1, pages 198-199, paragraphs 38 and 40

ceased to exist and the initial requests did not name the legal entity to whom they were addressed; (ii) he was entitled to demand that all communications only be routed via his lawyers and that had SARG simply made the request of Mr Ryan, the hearing could have been avoided; (iii) SARG had delayed in responding to his/Mr Ryan letters; and (iv) he could not be expected to attend a meeting while his harassment complaint was outstanding (see paragraph 97(viii) above). These four points are dealt with in turn below.

116. The Panel did not consider that there was any force in the argument that Aviation had been struck off the register of companies and/or that it was not clear to which entity the initial requests for documents had been addressed:

- i) Although the first email of 5 September 2024 could have been more clearly expressed, it was reasonably clear what the request related to given the explicit reference to Morecambe Bay. Even if there were some doubt, it would have been perfectly possible, and indeed appropriate, for Dr Crockford to have requested clarification of SARG's emails. In the emails from April 2024 Dr Crockford had well understood the CAA's enquiries to relate to Aviation's activities and indeed had apparently been content to correspond about them from his personal email address (see paragraphs 59 to 61 above).
- ii) The first request (on 5 September 2024) was technically made before Aviation was struck off.
- iii) The attempt to hide behind corporate entities was an unfortunate thread running throughout Dr Crockford's position. It was not disputed that Dr Crockford had held himself out as the accountable manager for the corporate entities and it was appropriate for the CAA to engage with him on behalf of regulated or previously regulated entities. The various permissions required Aviation to maintain the relevant records and it was not suggested that they did not exist or could not as a matter of practicality be obtained or provided.

117. The Panel was also not persuaded that Dr Crockford's complaint about the involvement of his lawyers was sufficient justification for his failure to engage:

- i) Dr Crockford was of course entitled to appoint legal representation and to make complaints via his lawyer. However that did not, in the Panel's view, remove the need for Dr Crockford to answer the questions posed by SARG, whether directly to SARG, or via his lawyer.
- ii) Mr Ryan's initial request for all communications to be routed (only) via him (letter dated 21 November 2024) did not come from Dr Crockford and SARG could not assume that this was authorised by Dr Crockford.³³
- iii) Most of SARG's communications were addressed to both Dr Crockford and Mr Ryan but to the extent that SARG's communications were addressed only to Dr Crockford and not to his lawyers, it was reasonable to expect Dr Crockford to pass relevant communications onto his lawyer, and to ask him to answer on his behalf.
- iv) It was reasonable for SARG to continue to communicate directly with Dr

³³ It seems from the correspondence that SARG subsequently sought specific confirmation from Dr Crockford on 16 December 2024 as to whether he authorised Mr Ryan to communicate on his behalf and this was again answered only by Mr Ryan (and the relevant confirmation was not forthcoming from Dr Crockford), see hearing bundle, Binder 2, page C49

Crockford as the regulated individual (or the human representative of the regulated individual), including in communications where his lawyer was in copy, particularly where SARG continued, reasonably, to seek technical information and discussions about regulated matters.

- v) Dr Crockford's argument that he could not or would not provide the information because he had been threatened with legal action by SARG is not convincing. A rational response to such a threat would be to take steps to remove it, i.e. by providing the requested information.

118. The related complaint that SARG had failed to respond in a timely manner to his complaints, or at all, was equally not an answer to the charge of failure to engage. The Panel considered that, as set out in detail in the chronology section above, the vast majority of letters from Dr Crockford or his lawyers were indeed substantively answered, albeit some of the responses were not provided particularly swiftly.³⁴ But in any event, even if this complaint were well-founded (which it is not), it would not provide an answer to the charge that Dr Crockford had failed, from his side, to provide proper information to and engagement with, SARG, which is logically separate from the issue of his complaints about the manner in which SARG interacted with him.

119. Finally, the Panel was not persuaded that it was reasonable for Dr Crockford to refuse to meet with representatives of SARG because of his 'outstanding harassment complaint':

- i) Dr Crockford alluded during the hearing to some form of future legal claim in this regard, but it was not clear to the Panel what form that harassment complaint had or would have; the Independent Complaints Assessor had ruled it to be out of scope.
- ii) At the hearing Dr Crockford showed himself to be well capable of addressing and communicating with members of the SARG team whom he has accused of harassment. Despite the fact that Dr Crockford's lawyer was present throughout the hearing (remotely, at his request), Dr Crockford effectively conducted the hearing himself; he delivered the vast majority of the submissions and indeed cross-examined members of the SARG team himself. There was nothing in his demeanour to suggest that he felt harassed or intimidated or unable to engage with those individuals at a face-to-face meeting. Indeed at times his manner bordered on combative and somewhat aggressive.

120. Overall, the Panel felt that that SARG had behaved reasonably in putting Dr Crockford on notice, offering meetings and explaining to him why they were seeking the relevant information. Indeed this approach continued during the hearing when SARG repeatedly emphasised that its preference continued to be to work with Dr Crockford to find a resolution to the impasse.³⁵ The Panel's evaluation of the evidence is that SARG has consistently offered a pathway to resolution with which Dr Crockford has unreasonably refused to engage.

³⁴ For example, Mr Ryan's letter of 17 August 2023 was responded to on 24 October 2023 (CAA letter addressed to Dr Crockford and Mr Ryan), Mr Ryan's letter of 15 October 2024 was responded to on 7 November 2024 (CAA letter addressed to Dr Crockford and Mr Ryan) and the letter of 7 February 2025 provided a comprehensive catalogue of responses to all of the correspondence up to that point

³⁵ For example, a SARG representative said at the hearing "*throughout all of this the direction of travel that we would prefer is to work with Dr Crockford and move towards a point where an authorisation as described could be achieved*", see the hearing transcript, page 67, lines 3-7

Implications of the failure to engage in view of the legal and policy framework

121. In light of the legal provisions set out in paragraphs 27 to 36 above, SARG were both entitled and required to consider the competence and suitability of Dr Crockford as the person held out as the accountable manager of Airshows and Aviation, as well as in his own capacity as the holder of Operator and Flyer IDs.
122. As regards the FOCPF specifically:
- i) This makes clear on its face that it applies to all individuals or postholders who are licensed or approved by the CAA.
 - ii) Furthermore, the Panel had no doubt that, as an experienced aviator, Dr Crockford would or should have been aware of the FOCPF. That is so whether or not references to fitness of character had been temporarily removed from CAP 772 prior to March 2025 (which was in any event before SARG formally made its proposal in April 2025).
 - iii) It was also no answer for the Applicants to complain about the absence of a specific 'competency framework' in relation to UAS; the specific complaints about Dr Crockford related to basic expected behaviours such as an open and honest dialogue with the regulator, not technical details as to specific matters of skill. In any event, UASs are an emerging technology and change in this sector happens quickly. It is therefore important that SARG retain discretion as regards the privileges and authorisations it oversees i.e. it is not a 'tick box' exercise. What is more important is that SARG exercise the discretion in a rational and not arbitrary way. The Panel considers that they have done so here.
123. While there seems to be no reason to doubt Dr Crockford's technical aviation competence, there are sound reasons to agree that he fails to meet the spirit of the FOCPF criteria of "*trustworthiness and a propensity to obey the rules.*" As evidenced above, he has deliberately avoided clarifying what his flights involved so SARG could assess whether they were within the rules, preferring instead to find fault with the requests. When SARG raised concerns that some of the flights, especially those involving a remote pilot in a manned aircraft, were outside his authorisation, he has presented no evidence that he took steps to ensure or check that they were within scope. His position was that SARG was in the wrong to ask and, as set out above, the initial response to the request for information was misleading. This raises legitimate concerns as to trustworthiness. Dr Crockford's public statement during the online discussion of 22 April 2025 that he rejected the CAA's attempts to meet with him and that he would continue "*not to follow their pathway forward*" supports the fears about Dr Crockford's propensity to obey rules.
124. It was no answer for the Applicants to argue that SARG had not pointed to a specific safety issue with particular flights. That misses the point. The FOCPF is at its heart concerned with risks associated with certain patterns of behaviour or characteristics rather than specific safety-related incidents. SARG is clearly entitled and obliged to seek information from regulated entities about their aviation operations, and if it is unable to obtain proper information, or to reassure itself that individuals are operating within the law and understand their responsibilities, then that clearly poses a potential safety risk. The precise extent and gravity of those risks may be unknown but, as SARG put it "*that's why the regulations exist -- for a competent authority to assess the risk and make a determination whether or not the risk to uninvolved third parties had been sufficiently mitigated*".³⁶ SARG had articulated clear potential safety concerns about the operation of drone flights from a manned aircraft, both to people in the air and people on the ground (see paragraph 95

³⁶ Hearing transcript, page 69, lines 12-16

above) which more than justified the position they had taken. It was not, therefore, correct to describe this as merely “*an administrative disagreement*”.

125. As to this last point, the fact that the CAA’s AMC did mention the possibility of conducting the flight from a moving vehicle or boat within the Open category does not assist the Applicants:

- i) The guidance was notably silent on the specific topic of whether it was permitted to fly a UAS from a manned aircraft, which in the Panel’s view is arguably materially different from the examples cited.
- ii) Furthermore, SARG was clearly entitled to ask questions about apparently novel UAS operations not covered by existing guidance (or mentioned in Aviation’s own risk assessment or operations manual).
- iii) In any event, SARG made it clear right from the outset that it did not consider such flights to be legitimately within the Open category.
- iv) The Panel does not ultimately need to resolve the underlying legal issue as to the Open category but the fact that Dr Crockford disagreed with SARG’s interpretation in this regard was obviously no excuse for a blanket failure to meet with SARG to discuss its concerns. Such a meeting would indeed have been a good opportunity for Dr Crockford to have explained his legal arguments in more detail and to allay SARG’s safety fears.

Other matters

126. The Panel did not agree that SARG had acted wrongfully in seeking to contact the NHS Trust directly for further information in August 2023, as the CAA has a duty of care to gather all the facts, especially in light of a concern from the in-region manager of air traffic services. In any event, that approach was swiftly followed (the next day) by detailed queries made directly to Dr Crockford. Dr Crockford’s refusal to answer those queries was not justified by his dissatisfaction with the original direct contact by SARG to the NHS Trust.

127. The fact that Dr Crockford to date remains authorised to fly manned aircraft up to 5.7 tonnes does not invalidate SARG’s actions. The factual context in which the present dispute has arisen is Dr Crockford’s involvement in UAS operations, not manned aircraft so it is unsurprising that it is – to date at least – his UAS permissions which have been under scrutiny. In any event, SARG have made it clear that Dr Crockford’s private pilot licence is being kept under review.

128. Similarly, the fact that the DMARES system sent an automated reminder to renew Dr Crockford’s Operator ID in March 2025, and that Airshows’ Operator ID was renewed online at around this time does not mean that SARG’s (later) decision concerning Operator IDs lacked rationality. SARG has explained coherently why it was only prompted to consider the question of Operator IDs (as opposed to the Operational Authorisation of Airshows) in light of the new information coming to light in April 2025 (paragraph 96(ii) above). The online prompt messages on the DMARES system in March 2025 were therefore not inconsistent, nor was the fact that the renewals were permitted to take place.

129. The alleged “regulatory overreach” (paragraph 102 above) was also no answer:

- i) SARG set out its reliance on the FOCPF (in conjunction with the competency requirements in the UAS Implementing Regulation) very clearly in the letter of 17 March 2025, to which the Applicants were invited to respond in detail. This was prior to the formal proposal letter of 7 April

2025. It must be open to a regulator to refine and clarify the specific criteria relied on in a regulatory decision-making process provided the affected parties understand the case made against them and have a proper opportunity to address them. It was not fair or accurate to complain that there had been a “*retrospective reclassification of the underlying issue*” but in any event the Applicants had had adequate opportunity to address the substance of the points made.

- ii) The reference to a potential prosecution in the 17 September 2024 email was no more than a reminder of the underlying legal powers of the CAA in this regard and an indication that the CAA ‘may consider prosecuting’ in this regard. As explained above, this did not excuse or justify Dr Crockford’s failure to engage properly with SARG.
- iii) SARG properly acknowledged that the original reference to a blanket ban on drone flying in the 8 May 2025 letter needed to be qualified and it duly did so on 27 May 2025. That mistake, while unfortunate, was subsequently corrected, and did not invalidate the central conclusions properly reached by SARG about the failure to engage.

130. The Panel has taken account of the occasions on which Dr Crockford had proactively engaged with the CAA (paragraph 103 above) and the letters in support of him, but these matters did not outweigh the central findings and concerns set out above.

SECTION H: ANSWERS TO THE QUESTIONS AND THE WAY FORWARD

QUESTION 1

On the balance of probabilities, in respect of the refusal of Airshows’ Operational Authorisation, -

- i) Did Dr Crockford fail to properly engage with SARG;
- ii) Does Dr Crockford’s failure to properly engage demonstrate that Airshows has failed to provide sufficient assurance that the nominated Accountable Manager - the key position when considering flight safety - is suitably competent to conduct that role; and
- iii) Accordingly, should Airshows’ application for an Operational Authorisation be refused?

ANSWER

- 131. Dr Crockford did not dispute that he was the accountable manager for Airshows (and Aviation). For the reasons set out above, the Panel is satisfied that Dr Crockford has failed properly to engage with SARG, and that this failure to engage means that the SARG proposal to refuse Airshows’ application is fully justified by reference to the requirements as to competency and/or the related FOCPF.
- 132. The Panel noted the fact that, very shortly before the hearing, Dr Crockford apparently transferred/ownership control of Airshows to a third party. However Dr Crockford did not suggest at the hearing that he was not still an accountable manager for Airshows, or argue that this made any difference to the Panel’s consideration of the issues.
- 133. For the reasons set out above, the SARG proposal was justified on the material available to the Panel, and the application should be refused. In the event that in future, Airshows

has a new Accountable Manager then it would be open for it to make a new application for an Operational Authorisation on that basis.

QUESTION 2

On the balance of probabilities, in respect of the decisions to suspend Dr Crockford's Operator ID and Flyer ID, -

- i) Is Dr Crockford continuing to fail to properly engage with SARG;
- ii) Does Dr Crockford's continued failure to properly engage and indicated future intention not to engage demonstrate that he presents a risk justifying the suspension of his Operator ID and Flyer ID;
- iii) Accordingly, should Dr Crockford's Operator ID and Flyer ID be suspended pending his suitable re-engagement or further consideration in November 2025?

ANSWER

134. For the reasons in paragraphs 113 to 120 above, the Panel is satisfied that Dr Crockford is continuing to fail to properly to engage with SARG, with the attendant problems and risks set out above.
135. The decision letter of 8 May 2025 said in terms “*The RPAS Sector Team took the decisions to suspend rather than revoke your Operator ID and Flyer ID and Electric Airshows Operator ID as it is hoped that your failure to engage with your regulator is an approach that can be remedied within a reasonable time period. Should you engage during the six-month suspension period then a decision could be taken, dependent on the engagement, to remove the suspensions.*” The Panel consider that SARG’s proposal to suspend rather than revoke these permissions, and the fact that SARG has repeatedly indicated a willingness to continue to work with Dr Crockford to resolve the outstanding questions about his UAS activities was (and remains) a proportionate response. The Panel therefore agrees that Dr Crockford's Operator ID and Flyer ID should remain suspended pending his suitable re-engagement or further consideration in November 2025.
136. In this regard, Dr Crockford’s belated offer to provide the flight logs from the August 2023 ‘specific’ category flights is an important step in the right direction but is not sufficient. There is now a window of opportunity before November 2025 for Dr Crockford to engage with SARG and provide them with the further information and assurance they require about the UAS flights he has conducted (or been involved in) in the past and intends to conduct in the future. The Panel urges Dr Crockford to take that opportunity.

QUESTION 3

137. On the balance of probabilities, in respect of the decision to suspend Airshows' Operator ID, -
- i) Is Dr Crockford continuing to fail to properly engage with SARG;
 - ii) Does Dr Crockford's continued failure to properly engage and indicated future intention not to engage demonstrate that he presents a risk justifying the suspension of Airshows' Operator ID given Dr Crockford's overarching position within Airshows;
 - iii) Accordingly, should Airshows' Operator ID be suspended pending Dr Crockford's suitable re-engagement or further consideration in November

2025?

ANSWER

138. For the reasons set out in relation to Question 1 above, the Panel is satisfied that the SARG proposal is justified on the material available to the Panel, and Airshows' Operator ID should be suspended.
139. For reasons set out in relation to Question 2 above, suspension rather than revocation is a proportionate response and it is now open to Dr Crockford or the new controllers and/or accountable manager of Airshows to engage with SARG and provide them with the further information and assurance they require.

QUESTION 4

On the balance of probabilities, in respect of the decision to revoke Aviation's Operator ID,

- i) Is Dr Crockford continuing to fail to properly engage with SARG;
- ii) Does Dr Crockford's continued failure to properly engage and indicated future intention not to engage demonstrate that he presented a risk justifying the proposal to revoke Aviation's Operator ID given Dr Crockford's overarching position within Aviation, Aviation was dissolved in 2024, Dr Crockford indicated he could not provide information relating to Aviation in 2024 as it had been dissolved and that Aviation's Operator ID was due to and did expire on 12 May 2025;
- iii) Accordingly, should Aviation's Operator ID have been revoked?

ANSWER

140. For the reasons in paragraphs 113 to 120 above, the Panel is satisfied that Dr Crockford is continuing to fail to properly to engage with SARG, with the attendant problems and risks set out above.
141. An issue arises as to the appropriate course of action given that Aviation was removed from the Companies Register in September 2024 and its Operator ID has now in any event expired. During the hearing, SARG explained that the proposal had been made at a time when Aviation's Operator ID appeared on its systems and therefore the decision was taken to formally revoke it as a precautionary matter.
142. The Panel is not persuaded that any further action needs to be taken, although it is satisfied SARG's proposal was justified on the substance of the matter. Whether or not SARG could as matter of practicality revoke the Operator ID of an entity which no longer exists seems to the Panel to be an arid point which need not be resolved in light of (i) the fact that this Operator ID has in any event expired and (ii) Dr Crockford's confirmation that he did not intend to revive Aviation in the future.

Yours sincerely



Anne Lambert
Chair of the Review Panel

cc: SARG Lawyer