



A right to know

Compliance report

© Civil Aviation Authority 2015

All rights reserved. Copies of this publication may be reproduced for personal use, or for use within a company or organisation, but may not otherwise be reproduced for publication.

To use or reference CAA publications for any other purpose, for example within training material for students, please contact the CAA for formal agreement.

CAA House, 45-59 Kingsway, London WC2B 6TE
www.caa.co.uk

Contents

	Foreword by Iain Osborne	2
	Introduction	5
	Information rights	7
	Questions and rankings	9
	New compliance approach	10
	Themes	12
	Future work programme	13
Annex 1	Airlines in first phase of work	14
	Airlines in second phase of work	15
Annex 2	CAA guidance on the legal obligation	16
Annex 3	Questions included in airline templates	18
Annex 4	Completed airline templates	20
	British Airways	20
	easyJet	23
	Ryanair	26
	Thomson Airways	30
	Flybe	33
	Monarch Airlines	36
	Thomas Cook Airlines	39
	Virgin Atlantic	41
	Jet2.com	45
	Emirates	46
	Deutsche Lufthansa	49
	Aer Lingus	52
	Air France KLM	55
	Wizz Air	59
	United Airlines	64

Foreword by Iain Osborne

Around 210 million people fly in and out of UK airports every year. It's an exciting time for many of those passengers and the vast majority of them arrive at their destination on time.

But things can and do go wrong. Storms, heavy snow, air traffic control problems – they can all significantly disrupt journeys and, lacking support from their airline, passengers could be left stranded and without the information they need.

This is why there is a European regulation in place to protect passengers during these situations. So when disruption occurs, airlines are legally obliged to provide passengers with information about their rights; food and refreshments; and accommodation when delayed overnight. The Regulation also means airlines should arrange alternative flights if a flight is cancelled and, if that cancellation or a long delay was not due to something out of the ordinary, passengers are also due compensation.

We know that airlines are well aware of these obligations, but how good are they at meeting them?

As part of our role as the UK's enforcement body for air passenger rights, we have carried out a review of the largest airlines operating in the UK to see how well they are complying with the regulations. We've started by focusing on the element of the regulation passengers would see as the most simple for airlines to carry out during disruption: providing passengers with information on their rights. Separately, we have also looked into the way airlines are handing compensation claims for disruption caused by technical faults on an aircraft. This was the subject of a recent [Court of Appeal decision](#)¹ and is an issue of considerable public interest at the moment. We have published a separate [report](#)², alongside this one, looking at this issue.

Returning to the subject of this report, that of information on legal rights under the Regulation, we've challenged airlines to explain their processes for getting this basic information to passengers on disrupted flights at the times when they need it most. How and when do they get information to their passengers? Do they use hard copy materials or other channels? How do senior managers know whether their processes are actually implemented on the ground, and so know how well their company is performing at informing passengers during disruption?

1 <http://www.bailii.org/ew/cases/EWCA/Civ/2014/791.html>

2 www.caa.co.uk/cap1275

We've started by focusing on the element of the regulation passengers would see as the most simple for airlines to carry out during disruption: providing passengers with information on their rights

These are the sorts of issues we have discussed with airlines and the results give us – and consumers – a much clearer picture on how well airlines are performing at meeting their obligations. Although not all of the airlines included in this report responded positively to the challenge we set them, a number of airlines did and, in doing so, have really upped their game in terms of ensuring that disrupted passengers get information on their legal rights under the Regulation.

We have found a number of examples of very good practice as well as some airlines we are very concerned about. Some airlines, for example easyJet, Ryanair and Wizz Air, have very clear processes in place to provide passengers with proactive and accurate information about their rights. They also deliver training for staff on how to ensure passengers get the information they need and have a system in place to review their performance. We welcome this approach and it's something we'd like to see replicated across the industry. Many of the other airlines have good processes in place to make sure they deliver accurate information to their passengers, and we have been pleased to see that a number of these airlines have also strengthened their processes to oversee compliance.

There are three other airlines, British Airways, Emirates and Lufthansa, who are taking steps to improve compliance and we will be working with these airlines to see how effective their new processes are. We will be providing an update on these three airlines in our follow-up report later this year. There is still room for improvement.

And lastly, we have also seen that two airlines are falling well below what is expected of them from their passengers and the law. Aer Lingus is below what we view as the required compliance level and Jet2 has given us no assurances that it has the right processes to provide passengers with the required information about their rights – something we believe their passengers will be very surprised and disappointed to learn. We have begun the legal phase of our enforcement process using our powers under Part 8 of the Enterprise Act against Aer Lingus and Jet2.

It is interesting to compare these findings with those of the separate report on compensation for disruption caused by technical faults. Some of the best airline performers on information rights are in fact those where we have the greatest concerns over payment of financial compensation, and vice-versa. Jet2 is of significant concern in both areas of compliance.

So what next? As well as allowing us to present a state of the nation report on how well airlines are performing, this review is crucial to informing where to focus our activities.

So rather than picking up issues only after something has gone wrong, we are now challenging airlines to demonstrate in advance how they meet the required standards. Where they fall short, we will work with them to highlight issues and ensure they are rectified. If airlines do not make the required changes voluntarily, we will consider our options, including the use of our enforcement powers to make sure they do.

Based on the experience we have gained in developing this report, and in particular the constructive way in which many of the airlines approached the challenge we set them, we are hopeful that airlines will continue to work with us to identify where improvements can be made, and make those improvements, without the need for us to resort to formal enforcement action, which can be both costly and time-consuming for everyone and which, ultimately, should be seen as the last resort.

This is part of our new long-term approach to enforcement; one that puts the onus of compliance on airlines, and allows us to target our resources much more effectively. It's an approach that in future we will use to assess how well airlines are complying with their obligations to provide welfare to passengers during disruption and re-route them when their flight is cancelled.

We will also use this approach to publish short ad-hoc reports on specific issues where there is a strong public interest, as we have done today in the case of how airlines are handling compensation claims for disruption caused by technical faults on an aircraft.

I hope you find these reports interesting and I look forward to updating you on how our approach is working and delivering real benefits for aviation consumers.

Iain Osborne

Group Director for Regulatory Policy
Civil Aviation Authority

Introduction

1. Consumers in the UK benefit from an aviation industry that offers a wide range of services and destinations to leisure and business travellers. Each year around 2 million flights carry 210 million passengers to and from the UK³. Most of these flights operate without problem. However, every day around 70 flights on average are either cancelled or delayed by over 3 hours.
2. When flights are cancelled or delayed or passengers are refused boarding, European law (Regulation EC 261/2004, referred to hereafter as 'the Regulation') provides a set of rights that apply to all those departing from UK airports and returning to the UK on a European airline. The CAA is responsible for enforcing these rights in the UK and, as the aviation market is an international one, this means that we deal with airlines from across the world.
3. The Regulation is just over 10 years old and during this time we have dealt with a range of compliance issues with individual businesses. Traditionally, we have identified the issues and businesses to tackle based on complaints from passengers or based on information gathered during large-scale disruption. Although we have had a number of successes in tackling individual businesses on specific issues in this way, we are concerned that we may not always be tackling the most important problems under the Regulation and the airlines that are causing these problems to arise.
4. Indeed, based on a recent review of complaints data, observations at airports during disruption, passenger survey data, and data provided directly by airlines, we are concerned that the Regulation is being applied in very different ways by different airlines and that, in general, a significant proportion of passengers are not satisfied with the assistance provided to them when their flights are disrupted.
5. It is the CAA's stated aim to ensure routine compliance with consumer protection law. Given this, and given the issues highlighted above with our current approach, it is clear to us that we need a new and different approach to delivering routine compliance across the industry.

3 CAA's 2013 airport statistics (to avoid duplication domestic passengers are only counted at one reporting airport).

6. Our new approach is grounded in the view that all airlines should have systems and processes in place to make sure they comply with their legal obligations. This is simply a matter of sound corporate governance – in well-run companies, such programmes are marbled through business processes and not treated separately from running the core business. Well-run companies do not plan to fail in their legal obligations to their customers in the hope that they might not get caught. This is in-line with our approach to safety regulation and the Air Travel Organisers' Licensing (ATOL) scheme, where we are taking a performance based approach to regulation. This allows us to get a better picture of performance and to target action at the poorer performers.
7. Our new approach will therefore be to require airlines to demonstrate how they assure themselves of their own compliance with the Regulation and the steps they have in place to monitor this and deal with any identified problems. The CAA is not the only interested party in this area, and airlines' primary accountability should be to their passengers. So, in a novel approach for the sector, we will be requesting that airlines make the details of how they comply transparent to the general public. We will also use this approach to publish short ad-hoc reports on specific issues where there is a strong public interest.
8. This report is the first step in applying this approach to compliance with the Regulation. It sets out what you can expect to see from the CAA and the areas that we will focus on in the future. We are putting the responsibility for compliance firmly where it belongs – on airlines themselves. Where there is any legal uncertainty in the Regulation itself, the CAA will provide guidance on what the law requires and will set minimum standards for compliance. Formal enforcement action will be targeted at those who fall short of compliance.





Information rights

9. This first report focuses on information rights. These are fundamental to the rest of the Regulation: when passengers know what assistance should be provided and the choices they should be offered, they are much better placed to ensure they obtain their rights. The Regulation requires airlines to make sure that passengers are routinely provided with clear information about their rights during disruption. There are two key things airlines are required to do:
- display a short notice at check-in desks reminding passengers that information on legal rights is available during disruption; and
 - provide more detailed information pro-actively to passengers when disruption happens (this is required when passengers are denied boarding, their flight is cancelled or their flight is delayed for at least 2 hours).
10. This report covers the fifteen largest airlines flying to and from the UK. The fifteen airlines covered in this report account for approximately 166 million of the passengers flying to and from the UK, or just under 80% of all passengers (see Annex 1). Our focus on the largest airlines means that our work delivers the most benefit to the largest group of consumers. In addition, focusing on a limited number of airlines in the first instance has allowed us to carry out detailed compliance work with each airline and to assess the processes and procedures they have in place to ensure information on legal rights is provided in practice. Once we have completed work with this group of airlines we will focus on the next group of airlines based on size (detailed at Annex 1).

Airline compliance reports

11. We have taken a number of steps to ensure airlines understand their obligations, can meet those obligations routinely, and can assure themselves of their own compliance (including how they monitor their compliance and deal with any identified problems). This has included producing a [leaflet](#)⁴ that airlines can use if they wish (and can tailor to include their own contact details). Alternatively, they can use the CAA text to review their own leaflets. We have also provided guidance to airlines on what the law requires them to do and the minimum compliance standard. In this case, our view is that the minimum compliance standard allows airlines to use electronic communication as their primary channel for providing information on rights, subject to them demonstrating this is effective for their own passengers, and that leaflets are also available at the airport and displayed prominently at key passenger touch points (full details are at Annex 2).
12. In August 2014 we wrote to the airlines covered by this report asking them to tell us how they ensure compliance with Article 14 and how they monitor the effectiveness of their methods for informing passengers of their legal rights at the time they are disrupted.
13. The airlines involved in this project all have different business models and include full service, low cost and charter airlines. We do not expect that each business should have the same processes and procedures in place – each business will need to tailor those procedures to fit its own operation. However, we do expect each business to be able to demonstrate that the processes they have in place are effective in ensuring the vast majority of passengers receive information about their rights when they suffer long delays and cancellations.
14. We have asked airlines to write their own contribution to this report setting out their processes to ensure compliance. Each airline has completed a template at Annex 3, so that it is easy to compare what each business has in place. A number of airlines have committed to putting additional steps in place to improve the way they provide information, or the way they oversee compliance.
15. At the end of each airline report we have included a CAA comment which provides a short summary of our assessment of the overall approach of the airline. It also includes data on the passengers carried and the estimated number of passengers affected by cancellations and long delays⁵.

4 www.caa.co.uk/CAP1126

5 This data combines the CAA's Punctuality Statistics from Heathrow, Gatwick, Stansted, Luton, Manchester, Birmingham, Glasgow, Edinburgh, Newcastle, and London City, and data on cancellations provided directly by airlines. Charter airlines tend to delay rather than cancel flights.

Questions and rankings

Questions we asked the airlines to answer

- 1. How, when and where they make hard copy information available to passengers and copies of the information provided**
- 2. The media channels they use (if any), the proportion of passengers they typically expect to reach through these channels, and examples of the information provided**
- 3. Details of their processes for assessing how effective they are in practice in informing passengers of their legal rights at the time they are disrupted**

We have benchmarked each airline's response against the minimum level of compliance set out in Annex 2. Airlines that meet this minimum standard have been given a rating of 'Good'. The airlines above and below this benchmark have also been rated. These ratings are described in more detail below:

Good

This means the following are present:

- The passenger information describes the rights accurately;
- Information is pro-actively provided to passengers affected by disruption, this can be demonstrated in one of two ways:
 - leaflets are pro-actively given to passengers who are affected by disruption, or
 - e-mails and SMS with clear information about passenger rights is provided, with leaflets prominently available at the airport (this is subject to the airline demonstrating electronic communication works for their passengers);
- There are written procedures for airline or ground handling staff, along with training;
- There is comprehensive detail on the airlines own processes to oversee compliance;
- Where relevant, the airline has given a commitment to strengthen the processes to ensure compliance.

Very good

In addition to the requirements set out for Good, the airline will have in place a range of processes which, on the face of it, should provide an even greater level of assurance.

Taking steps to improve compliance

In some cases airlines are taking steps to improve their compliance and we will be working with them to assess how effective those steps are.

Below the compliance standard

- Hard copy information is not provided pro-actively to passengers and/or it has not been demonstrated that electronic information is effective;
- There is little detail on the processes to oversee compliance, or limited processes in place.

Very good	Good	Taking steps to improve compliance	Below compliance standard
easyJet	Air France KLM	British Airways	Aer Lingus
Ryanair	Flybe	Emirates	Jet2
Wizz Air	Thomas Cook	Lufthansa	
	United		
	Thomson Airways		
	Virgin		
	Monarch		

New compliance approach

16. This section explains in more detail our compliance approach and what businesses and consumers can expect to see from our work in the future.

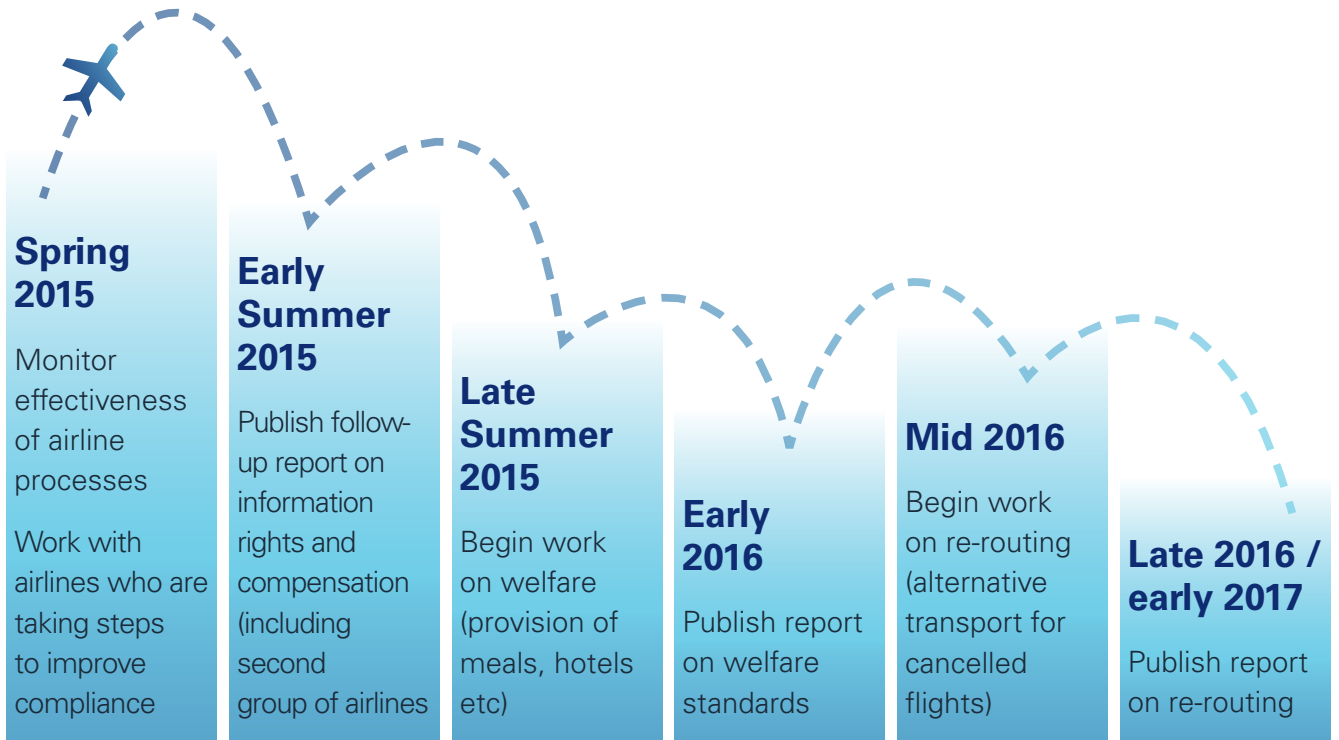
<p>Long term strategy</p> <p>This report is the first part of a compliance strategy for the next 2-3 years. During that time we will focus on different aspects of the Regulation and will aim to ensure compliance across the industry.</p> <p>We will base our work on risk and the principles of better regulation, using our resources in the most effective and efficient way.</p>	<p>Clarity</p> <p>We have set out for consumers and businesses the issues that we will focus on and have set out later in the report a clear timetable for our work.</p> <p>We will consult with stakeholders on guidance on the law and minimum compliance standards. This will ensure that businesses have a clear standard against which they can assess their own compliance.</p>
<p>Consistency</p> <p>By focusing on one issue at a time with a range of businesses we will ensure that there is a level playing field. We will focus first on the largest businesses, and will use this work to drive compliance with smaller airlines (Annex 1).</p> <p>We won't ignore other issues that arise, but will prioritise them if they pose a risk of significant harm to consumers and require urgent action. We may publish short ad-hoc reports in each case.</p>	<p>Targeted</p> <p>Our action will be focused on businesses who refuse to engage with this new approach or fall short of the minimum compliance standards.</p> <p>We will allow businesses the opportunity to put steps in place to meet the compliance standards. However, any who are unwilling to do so, or fail to deliver, will be subject to enforcement action.</p>
<p>Industry accountability</p> <p>Each airline is responsible for ensuring it is compliant with the Regulation. Airlines will need to demonstrate that they have robust processes in place to ensure compliance.</p> <p>Our expectation is that airlines should have a culture of compliance and strong internal governance that oversees compliance.</p>	<p>Transparency</p> <p>This report is the first in a series and we intend to publish annual reports. Published alongside this is a short report on how airlines handle compensation claims where the disruption was caused by a technical fault on the aircraft. Annex 4 is written by airlines detailing their compliance processes and highlighting any steps they are taking to improve them.</p>

Themes

We will be focusing our work on a range of specific requirements set down in the Regulation and will tackle one of these at a time.

<p>Information rights</p> <p>Providing information to disrupted passengers about their rights is a fundamental aspect of the Regulation and key to ensuring passengers understand their options. Without knowing what rights they have, consumers may make different choices or may be left out-of-pocket because they paid for a service they did not need to.</p> <p>Consumer research has shown that passengers do not appear to be routinely getting the necessary information about their rights. In tackling this theme first, it will ensure consumers can make effective choices.</p>	<p>Welfare assistance</p> <p>This theme will focus on the assistance airlines are required to provide to passengers during disruption. It includes refreshments, meals, telephone calls, hotel accommodation and transport to and from the airport.</p> <p>We will first consult on the minimum compliance standards and will then ask airlines to assess their compliance against those standards.</p>
<p>Re-routing</p> <p>This theme will look at re-routing. When a flight is cancelled passengers have a choice of either taking a refund or a re-route to their destination. A re-route might be on a later service on the same airline, it might be a flight with another airline or in some cases other modes of transport might be a suitable alternative (for example a coach, train or ferry).</p> <p>As with the previous theme of welfare, we will first consult on the minimum compliance standards.</p>	<p>Financial compensation</p> <p>Compensation and the ‘extraordinary circumstances’ exemption in relation to technical faults on aircraft has been the subject of a European court case and has also been considered in the Court of Appeal of England and Wales. Following the decision of the Supreme Court to not hear an appeal against the Court of Appeal ruling, there should now be legal clarity on this issue. We are publishing a separate report on airline compliance setting out how airlines are applying these rulings in their handling of compensation claims.</p>

Future work programme



Annex 1

Airlines in first phase of work

Airline	Passengers carried in 2013
British Airways plc	39,359,940
easyJet Airline Company Ltd	33,644,642
Ryanair	27,523,247
Thomson Airways Ltd	10,304,930
Flybe Ltd	7,359,438
Monarch Airlines	6,770,869
Thomas Cook Airlines Ltd	6,097,951
Virgin Atlantic Airways Ltd	6,075,958
Jet2.com Ltd	5,540,489
Emirates	4,162,491
Lufthansa	3,506,379
Aer Lingus	3,346,201
KLM/Air France	3,303,157
Wizz Air	2,963,036
United Airlines	2,613,621
Total	165,672,471
Proportion of passengers carried	80%
Total passengers carried to / from the UK	209,293,866

Source: CAA's 2013 airport statistics (to avoid duplication domestic passengers are only counted at one reporting airport).

Airlines in second phase of work

Airline	Passengers carried in 2013
American Airlines	2,372,534
US Airways (merged with American)	523,940
Norwegian Air Shuttle	2,209,862
SAS	1,887,083
Swiss Airlines	1,723,637
Air Canada	1,496,358
Delta Airlines	1,325,858
THY Turk Hava Yollari Turkish	1,209,081
Stobart Air	1,079,291
Qatar Airways	1,019,593
Singapore Airlines	974,459
Cathay Pacific Airways	908,747
Etihad Airways	902,125
City Jet	858,922
Germanwings	851,995
Alitalia	838,040
Total	20,181,525
Proportion of passengers carried	10%

Source: CAA's 2013 airport statistics (to avoid duplication domestic passengers are only counted at one reporting airport)



Annex 2

CAA guidance on the legal obligation

17. Recital 20 and Article 14 of the Regulation set out the obligation on airlines to provide information to passengers affected by denied boarding, cancellation or long delay:

Recital 20

“Passengers should be fully informed of their rights in the event of denied boarding and of cancellation or long delay of flights, so that they can effectively exercise their rights”

Article 14(1)

“The operating air carrier shall ensure that at check-in a clearly legible notice containing the following text is displayed in a manner clearly visible to passengers: “If you are denied boarding, or if your flight is cancelled or delayed for at least two hours, ask at the check-in counter or boarding gate for the text stating your rights, particularly with regard to compensation and assistance”

Article 14(2)

“An operating air carrier denying boarding or cancelling a flight shall provide each passenger affected with a written notice setting out the rules for compensation and assistance in line with this Regulation. It shall also provide each passenger affected by a delay of at least two hours with an equivalent notice. The contact details of the national designated body referred to in Article 16 shall also be given to the passenger in written form.”

18. In our view this sets down a requirement for airlines pro-actively to provide information on legal rights in paper form to all passengers affected by denied boarding, cancellation or long delay. Article 14(2) requires information to be provided to “each passenger affected” and is supported by Recital 20 which sets out the importance that passengers are “fully informed”. The use of the phrase “a written notice” in Article 14(2) indicates that the material should be presented in durable form, which does not depend on circumstances such as wi-fi access or a telephone being charged. We therefore consider that a physical document is required rather than electronic media.

19. There is an additional obligation in Article 14(1) which requires the display of a written notice telling customers to ask for the text of their rights in the event of denied boarding, cancellation or long delay. This does not mean that airlines only have to provide this information if the passenger requests it. The requirement to give notice to “each passenger affected” indicates that the obligation in Article 14(2) is not limited to a provision of information only to those who ask. In the CAA’s view, the purpose of the Article 14(1) requirement is as a form of fail-safe mechanism in the event that the airline does not pro-actively provide the required information.

Minimum compliance standard

20. As noted above, our view of the Regulation is that it requires airlines pro-actively to provide information on legal rights in paper form to all passengers affected by denied boarding, cancellation or long delay. However, we recognise that providing this information in hard copy is not the only way to communicate with passengers and that electronic channels may be more effective for some passengers. Therefore, the CAA would not take enforcement action if it was persuaded that effective communication with each affected passenger was in place using methods of compliance other than those implied by the Regulation.
21. Airlines that choose to adopt other methods for compliance, for example the use of electronic media to inform passengers of their legal rights, will need to demonstrate to the CAA that their chosen methods are effective in practice in informing each affected passenger of his/her legal rights at the time he/she is disrupted and that, as a fail-safe mechanism, information on legal rights will still be available in paper form at the airport (e.g. via a leaflet available and displayed prominently at the airline’s check in, rebooking and information desks).

Annex 3

Questions included in airline templates

- 1) Airline Name**
- 2) UK airports where the airline operates from**
- 3) Mechanisms through which information is provided to passengers about their legal rights during disruption**
 - a) Please provide an explanation of how, when and where you provide hard copy information about passenger rights. Please specify whether your policy is to proactively provide hard copy information to disrupted passengers, or whether you make this information available passively, for example through making it available on request.
 - b) Please provide an explanation of whether, and if so how, you use electronic media channels to distribute information to passengers on their legal rights. Please specify the proportion of passengers you typically expect to reach through these channels
 - c) Please provide an explanation of whether other means are used to inform passengers of their legal rights, for example PA announcements at the airport, announcements on-board the aircraft, contact with the passenger after the event, etc.
- 4) Airline procedures and processes for informing passengers of their legal rights during disruption**
 - a) Please provide the job role(s) or team(s) accountable within your organisation for compliance with Regulation EC261, and in particular the provision of information on legal rights to disrupted passengers, both 'on-the-ground' at the airport as well as at head office.
 - b) Please provide details of the manuals/instructions which set out the procedures that airline or ground handling staff are required to follow to provide information on legal rights to disrupted passengers.

- c) Please provide details of any training provided to airline or ground handling staff on the procedures. Please specify the length and frequency of training.

5) Airline procedures and processes for assessing compliance with the requirement to inform passengers of their legal rights during disruption

- a) Please provide details of the 'pre-disruption' procedures and processes you have in place for ensuring compliance. By 'pre-disruption' we mean procedures and processes that take place regularly to ensure, for example, that Article 14.1 notices are displayed, that sufficient stocks of information rights leaflets are available, that refresher training has taken place, etc.
- b) Please provide details of the procedures and processes you have in place for assessing compliance during the disruption. Please specify whether you conduct audits or 'mystery shopping' during disruption (and, if so, their content and frequency) to ensure that information on legal rights is being provided. Please specify also whether you require reports to be produced by airline or ground handling staff for each cancelled/delayed flight (and, if so, what the report captures in relation to the provision of information on legal rights).
- c) Please provide details of the procedures and processes you have in place for assessing compliance after the disruption. Please specify whether you have procedures and processes for identifying problems with the provision of information on legal rights through passenger complaint handling (if so, please specify if this is systematic or ad-hoc). Please also specify whether you conduct surveys of passengers on disrupted flights to assess whether they received their rights under Regulation EC261, including in relation to information on legal rights.

6) Airline procedures and processes for addressing issues with compliance with the requirement to inform passengers of their legal rights during disruption

- a) Please provide details of the procedures and processes you have in place to ensure that, when issues arise in relation to the provision of information on legal rights during disruption, the necessary action is taken to ensure that these issues are addressed.

Annex 4

1) Airline Name

British Airways

2) UK airports where the airline operates from

Aberdeen, Belfast City, Edinburgh, Glasgow, Jersey, Leeds Bradford, London City, London Gatwick, London Heathrow, Manchester, Newcastle.

3) Mechanisms through which information is provided to passengers about their legal rights during disruption

a) How, when and where hard copy information about passenger rights is provided.

Customers are advised of a disruption in the airport in a number of ways including:

- messages on the flight information displays,
- passenger announcements in the terminal, gate area or lounge,
- staff at check-in or baggage drop desks,
- boarding gate staff
- a text message to their phone

Customers may request additional information, arrange flight re-booking, obtain refreshment vouchers at one of our customer service points including: check-in or bag drop desks, customer service desks, reservations desks, Executive Club lounge guest services desks, and baggage services desks. The CAA "Your Rights" leaflet is on display at all these desks for all customers to take as required.

b) Whether the airline used electronic media channels to distribute information to passengers on their legal rights.

Customers may be advised of a disruption by email and text message. These messages will alert customers to the disruption, which enables them to alter their travel plans as needed. The messages contain a link to ba.com where the customer can arrange re-booking etc. There are links on ba.com to a general 'disruption page' which contains details of passenger rights under (EC)261/2004.

c) Other means of informing passengers of their legal rights.

Other channels are used to notify of disruption but these do not explicitly refer to passenger rights.

4) **Airline procedures and processes for informing passengers of their legal rights during disruption**

- a) Job role(s) or team(s) accountable for compliance with Regulation EC261.

Airport Managers, Customer Service Managers, Legal department, Facilitation, Commercial and Transfers teams.

- b) Detail of manuals/instructions setting out procedures for airline/ground handling staff.

- c) Details of any training provided to airline or ground handling staff on the procedures.

Airport staff undergo an annual general disruption training course that covers all processes to be followed during times of disruption. Communication to all Customer Service staff with the introduction of new CAA leaflet, as a change to an existing process.

5) **Airline procedures and processes for assessing compliance with the requirement to inform passengers of their legal rights during disruption**

- a) Details of the 'pre-disruption' procedures and processes for ensuring compliance.

BA operates a disruption management programme that manages a training plan, runs practice exercises and works with our airport partners to plan for various disruption scenarios.

- b) Details of the procedures and processes for assessing compliance during the disruption.

- c) Details of the procedures and processes for assessing compliance after the disruption.

6) **Airline procedures and processes for addressing issues with compliance with the requirement to inform passengers of their legal rights during disruption**

- a) Details of the procedures and processes to ensure that the necessary action is taken to address any issues identified.

BA will call together managers from the relevant departments to address any specific issues which may arise in relation to EC261/2004. They will form a team with a mandate to review the issue and implement procedure or process changes across the business as needed.

CAA comment	
British Airways – Taking steps to improve compliance	
Passengers carried in 2013	39.4 million
Estimated number of passengers affected by delays and cancellations	900,000
We welcome the steps BA is taking to improve the electronic information it provides to passengers about their rights. We will be working with BA to assess how effectively information is provided to passengers and will provide an update in our next report	

1) Airline Name

easyJet Airline Company Limited and easyJet Switzerland

2) UK airports where the airline operates from

INV, ABZ, EDI, GLA, LPL, NCL, BFS, BHX, MAN, BRS, LTN, STN, SEN, LGW, BOH

3) Mechanisms through which information is provided to passengers about their legal rights during disruption

a) How, when and where hard copy information about passenger rights is provided

Yes we proactively provide leaflets in the airport at time of disruption. We also send emails and have the website FAQs available. Further details are contained in section 8 of the Customer Standards Manual.

b) Whether the airline used electronic media channels to distribute information to passengers on their legal rights.

In addition to the disruption leaflets, electronic information is provided by email & SMS for cancellations and delays over 3 hours to all customers whose details we have. Further details are contained in section 8 of the Customer Standards Manual.

The CAA is well aware of easyJet's campaign to get customer contact details from online travel agents in order to increase the effectiveness of this channel of communication in times of disruption.

In addition, we update our flight blog (<http://flighttracker.easyjet.com/en/flight-tracker>) for each individual flight for both delays and cancellations. Passengers' rights for delays and cancellation are accessible on this site. We typically expect to reach around 70% of the flight through electronic means based on booking profile and contact information that we have on record.

c) Other means of informing passengers of their legal rights

Our contact centre is equipped to provide information to passengers in addition to the above. Further details are contained in section 8 of the Customer Standards Manual.

4) Airline procedures and processes for informing passengers of their legal rights during disruption

a) Job role(s) or team(s) accountable for compliance with Regulation EC261.

The responsibility is shared by the Ground Operations, Operations Control Centre, Customer Operations and the many ground handlers around the network.

At an airport level this is delivered via our contracted third party Ground Handling Agents. For most easyJet airports there is additionally a dedicated "Service Delivery Manager" (employed by the GHA but dedicated to the easyJet product) with local accountability for ensuring compliance with easyJet requirements.

- b) Detail of manuals/instructions setting out procedures for airline/ground handling staff.

Details in both the GHM and also the Customer Standards Manual.

- c) Details of any training provided to airline or ground handling staff on the procedures.

Procedures are in the ground handling manual. Training is undertaken by ground handlers for their own staff.

Additionally, easyJet have recently issued a Customer Standards Manual designed to reinforce the delivery of policies and procedures from the GHM. The primary aim of the Disruption section of the CSM is to embed consistent local procedures in the event of disruption.

5) **Airline procedures and processes for assessing compliance with the requirement to inform passengers of their legal rights during disruption**

- a) Details of the 'pre-disruption' procedures and processes for ensuring compliance.

The Customer Standards Manual (supportive of the GHM) details specific requirements of the airport and Ground Handling Agent, including the preparation of local checklists, etc. The CSM is updated twice per year, and there is a requirement for the easyJet Ground Operations Manager (jointly with Ground Handler and other parties) to complete a full review and formally identify and address any areas of non-compliance, and list any "exemptions" for formal approval.

This review is conducted twice per annum for easyJet's 50 largest airports (annually for all remaining) and is in addition to routine compliance checks (using our "Standards Assurance" process) which are undertaken periodically between these reviews.

- b) Details of the procedures and processes for assessing compliance during the disruption.

During disruption the Ground Handler is in contact with OCC, confirming that the Ground Handling manual is being complied with eg distribution of passenger rights information, and LRVs, Hotac offered and provided etc.

Where we have airport managers in situ, they will observe and help in times of disruption ensuring that our manual is complied with and our passengers are cared for.

Additionally we will typically conduct a post-disruption review following any significant disruption events, in order to capture any learnings.

- c) Details of the procedures and processes for assessing compliance after the disruption.

Each ground handler is required to complete a Disruption Welfare report and submit to our operations team following a cancellation or extended delay. This document details the assistance provided by the ground handler. This is then audited in the event that a complaint is received by easyJet alleging that the Regulation was not complied with e.g. light refreshment vouchers not received by a disrupted passenger. A customer survey is sent electronically to any customer flying out of or into one of our top 51 airports, as long as we have a valid e-mail address in the booking.

This excludes many bookings made through the trade or corporate travel agencies as they tend to have the agency rather than the customer contact in the booking.

If the customer confirms that the flight was delayed >3 hours, the customer is asked if he/she received their rights and LRVs.

Our Operations and Customer departments have agreed to have a disruption focused questionnaire to be sent to all disrupted pax that we have email addresses for on the following types of disrupted flights:

- Delayed more than three hours
- Cancelled
- Diverted
- Delayed overnight

Questions will be tailored to understand the pax experience and ground handlers' compliance with 261 and easyJet's own customer service standards. It is planned for launch in summer 2015.

6) Airline procedures and processes for addressing issues with compliance with the requirement to inform passengers of their legal rights during disruption

- a) Details of the procedures and processes to ensure that the necessary action is taken to address any issues identified.

Any such report received within Ground Ops will be forwarded to the relevant Managers, typically both the Regional Ground Ops Manager (RGM UK) in addition to the Ground Operations Manager (GOM) for the station.

This would typically be followed up directly with the Ground Handling Agent in order to continually reinforce the compliance requirements.

CAA comment	
easyJet – Very good	
Passengers carried in 2013	33.6 million
Estimated number of passengers affected by delays and cancellations	200,000
easyJet has demonstrated that it exceeds the minimum compliance standard in that it has a range of processes in place to oversee compliance with the Regulation and to ensure passengers receive the information they need on their rights during disruption. Of particular note is easyJet's survey of delayed passengers and its commitment to a new survey asking all disrupted passengers to complete a survey in relation to the provision of rights information.	

1) Airline Name**Ryanair****2) UK airports where the airline operates from**

London Stansted, London Gatwick, London Luton, Birmingham, East Midlands, Cardiff, Bristol, Bournemouth, Manchester, Liverpool, Glasgow Prestwick, Glasgow Intl, Edinburgh, City of Derry, Newcastle

3) Mechanisms through which information is provided to passengers about their legal rights during disruption

- a) How, when and where hard copy information about passenger rights is provided.

The Article 14.1 notice is displayed at all airport check-in desks and at the ticket desk.

The Article 14.2 notice is proactively provided when there is a delay of more than 2 hours or in the event of a flight cancellation.

- b) Whether the airline used electronic media channels to distribute information to passengers on their legal rights.

Once a flight delay reaches 2 hours, customers are automatically sent an email detailing and giving access to their rights applicable under EU261 including a pdf version of the EU261 Article 14.2 notice in their required language. This email is sent to the address provided at the time of booking. SMS messages are sent to the customers mobile number (advised at the time of booking) updating them on the flight delay status and directing them to review their email or go to the ticket desk for assistance.

Within 15 minutes of a flight cancellation, customers are sent an email detailing and giving access to their rights applicable under EU261 including a pdf version of the EU261 Article 14.2 notice in their required language. This email is sent to the address provided to us at the time of booking. SMS messages are also sent to the customers mobile number (advised at the time of booking) advising them of the flight cancellation, directing them to review their email or go to the ticket desk for assistance.

We typically see that there is a high rate of delivery and read rate of the email messages sent to customers with a delivery rate of over 98% and read rates of over 97% for disruptions during 2014.

- c) Other means of informing passengers of their legal rights.

Airport staff have scripted announcements to make following a delay or cancellation these are detailed in our Ground Operations manual.

Cabin crew have scripted announcements to make following a delay or cancellation these are detailed in the Cabin Crew Procedures manual

We contact UK passengers via email after a disruption to apologise for the delay/cancellation and ask them to complete a survey in relation to compliance with the Regulation (Article 9)

4) **Airline procedures and processes for informing passengers of their legal rights during disruption**

- a) Job role(s) or team(s) accountable for compliance with Regulation EC261.

Proactive communications (email/SMS) to customers affected by a delay or cancellation – Customer Service Manager - Dublin

Head Office Ground Operations – On Duty Agents

Head Office Ground Operations – Head of Ground Ops

Airport staff – Ticket Desk Agent

Airport staff – Duty Manager

Airport staff – Gate Agent

- b) Detail of manuals/instructions setting out procedures for airline/ground handling staff.

- Ground Operations Manual
- Disruptions Manual
- Procedure for denied boarding
- Post cancellation passenger letter
- Ryanair/Easyjet/Jet2 reaccom agreement
- EU261 14.2 notice in all required languages
- Cabin crew procedures manual
- Customer Service agent training manual/Online assessed course
- Contact Centre training manual/ Online assessed course

- c) Details of any training provided to airline or ground handling staff on the procedures.

Call centres EU261 training – 1 day plus recurrent yearly plus ad-hoc updates – as required

Airport staff and in house EU261 training– 2 hours online assessed course or at airport as part of policy and procedure training recurrent/plus adhoc updates – as required

Customer Service EU261 training - 1 week recurrent plus 1 day yearly - plus adhoc updates – as required

5) **Airline procedures and processes for assessing compliance with the requirement to inform passengers of their legal rights during disruption**

- a) Details of the ‘pre-disruption’ procedures and processes for ensuring compliance.

Article 14.1

Airport handling agents are responsible once a week to check that all 14.1 notices are in place at check-in and airport ticket desks.

Article 14.2

Airport handling agents are responsible once a month to check that the most recent version of the 14.2 notice in all applicable languages are printed out and easily accessible in the event of a delay over 2 hours or a flight cancellation.

Airports keep a training log of staff that have completed disruption training and schedule recurrent training as and when individual employees require it (yearly or sooner depending on legal requirements)

- b) Details of the procedures and processes for assessing compliance during the disruption.

UK Customers affected by a delay over 2 hours or cancellation are surveyed to assess what information and assistance were provided. The results are analysed to identify training needs or to amend our proactive communications with customers. We also review customer complaints and feedback relevant issues and recommendations for change/training to airports.

Airports are required to confirm to us that they have complied with the Regulation via email and our Ground Operations department collate an excel spreadsheet with all the information regarding the flight.

- c) Details of the procedures and processes for assessing compliance after the disruption.

We contact UK passengers via email 2 days after a disruption to apologise for the delay/cancellation and asked them to complete a survey in relation to the provision of information and compliance the Article 8 and 9. We also regularly review customer complaints in order to feedback relevant issues and recommendations for change/training to airports in relation to compliance with EU261. We use Twitter feedback for this purpose also

6) Airline procedures and processes for addressing issues with compliance with the requirement to inform passengers of their legal rights during disruption

- a) Details of the procedures and processes to ensure that the necessary action is taken to address any issues identified.

If an issue is identified with an airport in relation to provision of information to customers, we contact the airport concerned to advise them and ask for a report on how they will prevent a re-occurrence. We also follow up with a mystery shopper audit and further airport training

CAA comment	
Ryanair – Very good	
Passengers carried in 2013	27.5 million
Estimated number of passengers affected by delays and cancellations	200,000
<p>Ryanair has demonstrated that it exceeds the minimum compliance standard in that it has a range of processes in place to oversee compliance with the Regulation and to ensure passengers receive the information they need on their rights during disruption. Of particular note is Ryanair's commitment to asking disrupted passengers to complete a survey in relation to the provision of rights information.</p>	

1) Airline Name

Thomson Airways Ltd

2) UK airports where the airline operates from

Regular Flights: Aberdeen, Belfast, Birmingham, Bournemouth, Bristol, Cardiff, Doncaster, Edinburgh, East Midlands, Exeter, Glasgow, Leeds Bradford, Gatwick, Luton, Manchester, Newcastle, Norwich, Stansted:

Ad-hoc flights: Southend, Southampton, Humberside, Belfast Harbour, Londonderry.

3) Mechanisms through which information is provided to passengers about their legal rights during disruption

- a) How, when and where hard copy information about passenger rights is provided.

Thomson Airways proactively provides CAA approved leaflets to passengers, explaining their rights, when flights are delayed. These leaflets are handed out at the same time that refreshment or meal vouchers are issued.

- b) Whether the airline used electronic media channels to distribute information to passengers on their legal rights.

Thomson Airways does not use electronic media to provide information on their legal rights to passengers.

- d) Other means of informing passengers of their legal rights.

In addition to providing CAA approved leaflets at the time of disruption, passenger rights are fully explained upon receipt of correspondence from passengers relating to events when they make a claim.

4) Airline procedures and processes for informing passengers of their legal rights during disruption

- a) Job role(s) or team(s) accountable for compliance with Regulation EC261.

Thomson Airways has a legal duty to comply with the law and it has procedures and processes in place within the relevant departments to ensure that the provisions of EU261 are met. The Customer Operations team are responsible for ensuring that the passenger rights leaflets are distributed with refreshment and meal vouchers. The Airport Service Delivery & Compliance team are responsible for ensuring that the Thomson Airways ground agent carries out their tasks effectively. The After Travel Customer Team are responsible for ensuring that correct information is provided to passengers when making a claim. All of these departments have processes to monitor compliance and take steps to improve processes if found to be deficient.

- b) Detail of manuals/instructions setting out procedures for airline/ground handling staff.

Details of the Thomson Airways procedures are contained within a Notice to Ground Handling Agents and will be incorporated into operational manuals.

- c) Details of any training provided to airline or ground handling staff on the procedures.

Internal staff training of Thomson Airways Customer Operations team on EU261 requirements is undertaken during induction training, and is incorporated into Customer Operations Operational Manual.

External Training on the application of these requirements is carried out by Thomson Airways Ground Handling Agents to their own training schedule. This would include initial and refresher training.

5) Airline procedures and processes for assessing compliance with the requirement to inform passengers of their legal rights during disruption

- a) Details of the 'pre-disruption' procedures and processes for ensuring compliance.

Thomson Airways carries out quarterly airport evaluation checks to ensure compliance with all procedures. This forms part of a UK CAA approved oversight programme which requires positive acknowledgement that procedures are being applied within the regulation.

- b) Details of the procedures and processes for assessing compliance during the disruption.

Thomson Airways has processes in place to monitor compliance with EU 261, including customer service quality reports and the monitoring of complaint letters.

- c) Details of the procedures and processes for assessing compliance after the disruption.

Thomson Airways has processes in place to monitor compliance during disruption. Procedures include checking the number of leaflets issued against the flight details and the number of passengers on board. Additionally we monitor passenger correspondence for instances of reported non-provision of passenger rights.

6) Airline procedures and processes for addressing issues with compliance with the requirement to inform passengers of their legal rights during disruption

- a) Details of the procedures and processes to ensure that the necessary action is taken to address any issues identified.

In the unlikely event that issues arise with compliance during disruption, Thomson Airways has processes in place to ensure that this is addressed.

CAA comment	
Thomson Airways – Good	
Passengers carried in 2013	10.3 million
Estimated number of passengers affected by delays	120,000
Thomson Airways has put in place improvements to its oversight processes, notably through the introduction of its new audit scheme.	

1) Airline Name

Flybe

2) UK airports where the airline operates from

Birmingham, Manchester, East Midlands, Liverpool, Leeds, Isle of Man, Belfast, Edinburgh, Glasgow, Newcastle, Aberdeen, Inverness, Southampton, Exeter, Gatwick, Newquay, Southend, Doncaster, Norwich, Teeside, Humberside, London City, and Cardiff.

3) Mechanisms through which information is provided to passengers about their legal rights during disruption

- a) How, when and where hard copy information about passenger rights is provided

Passenger rights information is visibly available at locations where passenger check-in or ticketing takes place at the airport. In addition, our ground handling agents at each airport are instructed to proactively provide hard copy information on legal rights to disrupted passengers (where time allows, so as not to jeopardise the new departure time of the flight).

- b) Whether the airline used electronic media channels to distribute information to passengers on their legal rights.

We do not currently supply electronic information to passengers, however, this is an area that we will investigate We do not inform passengers of their rights via the public address system at the airport. Neither do we inform passengers of their rights when on-board.

- c) Other means of informing passengers of their legal rights

We do not inform passengers of their rights via the public address system at the airport. Neither do we inform passengers of their rights when on-board.

4) Airline procedures and processes for informing passengers of their legal rights during disruption

- a) Job role(s) or team(s) accountable for compliance with Regulation EC261.

The postholder in Flybe responsible for ensuring our ground handling agents comply with the requirement to proactively provide hard copy information on legal rights to disrupted passengers is the Director of Customer Delivery who delegates to Head of Ground Operations. The Head of Ground Operations maintains a close relationship with the Head of Customer Support.

- b) Detail of manuals/instructions setting out procedures for airline/ground handling staff.

As referred to above, at each airport Flybe's ground handling agents are instructed to proactively provide hardcopy information on legal rights to disrupted passengers. This instruction is captured in Flybe's Ground Handling Manual, which is part of Flybe's Operations Manual, which sets out the procedures that airline and ground handling staff are required to follow.

- c) Details of any training provided to airline or ground handling staff on the procedures.

Customer Relations staff are given initial training at the point they join Flybe (there is no update training). The staff of our ground handling agents are given familiarity of regulations training upon joining and this is audited by Flybe.

5) **Airline procedures and processes for assessing compliance with the requirement to inform passengers of their legal rights during disruption**

- a) Details of the 'pre-disruption' procedures and processes for ensuring compliance.

Each airport is audited by Ground Operations Management Teams to ensure appropriate stocks of the hardcopy information on passenger rights is kept and that this information is on display as required. Audits are prioritised by the number of sectors/passengers and are conducted when the Management Team visit these stations. Stations are grouped by category primary stations are stations with over 5000 flights per annum, secondary between 500 and 5000 and tertiary are stations below 500 flights per annum. There is no set frequency in terms of an audit programme however, we expect all stations to be visited annually.

- b) Details of the procedures and processes for assessing compliance during the disruption.

Immediately following any flight cancellations or long delays, we require our ground handling agents to complete a disruption form detailing all aspects of the disruption, including whether hardcopy information on passenger rights was distributed and any relevant passenger feedback. The disruption forms are stored centrally and can be accessed by Flybe's Customer Relations team. If a passenger subsequently alerts us to an issue that we have not already been made aware of, our Customer Relations team will escalate this issue to our Ground Operations Management team.

- c) Details of the procedures and processes for assessing compliance after the disruption.

Our current passenger satisfaction survey does not specifically target passengers on disrupted flights to assess how well they were looked after by Flybe, including whether they received information on their legal rights as our sample is a random sample of all our passengers, including those on disrupted flights.

6) Airline procedures and processes for addressing issues with compliance with the requirement to inform passengers of their legal rights during disruption

- a) Details of the procedures and processes to ensure that the necessary action is taken to address any issues identified

Although Flybe's Ground Operations Management team receive the individual disruption reports directly from the ground handling agents at the airports from which we operate, these reports are not checked systematically to identify areas of potential non-compliance. We do plan to introduce a review process at Flybe's head office to check the disruption reports daily and highlight any compliance issues to the Head of Ground Operations, we expect this to be in place by early 2015. This will also be reviewed in conjunction with customer feedback provided from our Customer Relations team.

CAA comment	
Flybe – Good	
Passengers carried in 2013	7.4 million
Estimated number of passengers affected by delays and cancellations	120,000
Flybe has put in place steps to strengthen its compliance oversight by introducing a new review process to check disruption reports daily.	

1) Airline Name**Monarch Airlines Limited****2) UK airports where the airline operates from**

LGW, EMA, BHX, LTN, LBA, MAN

3) Mechanisms through which information is provided to passengers about their legal rights during disruption

- a) How, when and where hard copy information about passenger rights is provided.

Monarch Airlines use the CAA's passenger rights leaflet in times of disruption. We proactively hand out such leaflets either at check-in or when welfare vouchers are being distributed with the aim that every passenger is offered a passenger rights leaflet.

- b) Whether the airline used electronic media channels to distribute information to passengers on their legal rights.

Monarch Airlines will in certain circumstances utilise electronic media channels such as email or text messages to inform our passengers of their rights, prior to their arrival at the airport. Our intention when utilising these channels is to proactively contact all passengers through this type of medium in those circumstances.

- c) Other means of informing passengers of their legal rights

4) Airline procedures and processes for informing passengers of their legal rights during disruption

- a) Job role(s) or team(s) accountable for compliance with Regulation EC261.

This is managed between the Ground Operations Team and the Legal Department both in Head Office.

- b) Detail of manuals/instructions setting out procedures for airline/ground handling staff.

The procedure which Monarch operates in times of disruption in relation to passenger rights is that passengers are to be proactively offered an information rights leaflet at the same time as the welfare vouchers are being distributed. All instructions provided over the years are sent via email to our staff and ground handlers. In the event something is updated we will again notify via email. We have found this method to be very effective over the years.

- c) Details of any training provided to airline or ground handling staff on the procedures.

5) **Airline procedures and processes for assessing compliance with the requirement to inform passengers of their legal rights during disruption**

- a) Details of the 'pre-disruption' procedures and processes for ensuring compliance.

In all of our UK bases except LBA and EMA we have Front of House Managers. They are the 'face of Monarch' and oversee the ground staff and ground handlers at our UK bases. One of their many responsibilities includes ensuring Article 14.1 notices are prominently displayed along with conducting audits on our ground handlers in times of disruption.

Additionally we also have North/ South Regional Managers responsible for the overall management of the different regions. One of their responsibilities is to ensure that Article 14.1 notices are prominently displayed in our bases. This would include EMA and LBA for the Northern Regional Manager thus ensuring all our UK bases are compliant.

- b) Details of the procedures and processes for assessing compliance during the disruption.

Monarch have now introduced an auditing scheme to allow us to monitor compliance with our obligations under EU261 during a disruption. Front of House Managers will audit as many disruptions as possible to try and get an overall picture. The audits will cover items such as the effectiveness of the leaflet and welfare voucher distribution. The audits will form part of Monarch's Ground Operations Checklist which are carried out regularly across all airports Monarch operates into. This includes overseas airports. This will be monitored over the course of the year.

- c) Details of the procedures and processes for assessing compliance after the disruption.

Monarch Airlines have a dedicated EU 261 Team in Customer Service whose responsibilities include monitoring compliance through customer feedback. At Monarch Airlines we welcome customer feedback and in the unlikely event that a customer has encountered an issue during a disruption or otherwise, that information is fed back into the relevant department or team to address and prevent (if possible) such an issue reoccurring in the future.

6) **Airline procedures and processes for addressing issues with compliance with the requirement to inform passengers of their legal rights during disruption**

- a) Details of the procedures and processes to ensure that the necessary action is taken to address any issues identified.

Every quarter Head of Ground Operations and the Ground Operations Senior Management team meet to discuss the results. They will specifically identify if there are any areas for improvement and take any necessary action to implement the improvements directly with our ground handlers and ground staff. The Ground Operations Department have overall responsibility for our ground staff including ground handlers at the airports we operate into. We believe that this is the most effective way of monitoring our compliance with EU261 and ensuring our passengers' rights are upheld.

CAA comment	
Monarch – Good	
Passengers carried in 2013	6.8 million
Estimated number of passengers affected by delays	100,000
Monarch has put in place steps to strengthen its oversight process by introducing an audit process to review the issue of passenger leaflets.	

1. Airline Name

Thomas Cook Airlines Ltd

2) UK airports where the airline operates from

ABZ, GLA, NCL, BFS, DSA, IOM, MAN, EMA, BHX, CWL, EXT, BRS, STN, LGW

3) Mechanisms through which information is provided to passengers about their legal rights during disruption

- a) How, when and where hard copy information about passenger rights is provided.

We proactively provide a hard copy of Reg261 rights to all affected customers during disruption. This is distributed by our handling agents at the airport.

- b) Whether the airline used electronic media channels to distribute information to passengers on their legal rights.

We currently have a 'Flight Tracker' on our website, and we will be adding Reg261 rights information to this by mid-November. The website is very new and we do not actively promote it to customers as yet. We do, however, plan to communicate this to customers on their documentation and through SMS disruption updates by the end of November 14.

- c) Other means of informing passengers of their legal rights.

Our primary form of communication is proactively distributing letters at the airport.

4) Airline procedures and processes for informing passengers of their legal rights during disruption

- a) Job role(s) or team(s) accountable for compliance with Regulation EC261.

CAA Ground Ops Post Holder, UK Area Manager, UK Regional Airport Managers, Customer Service Duty Coordinators, Airport Duty Managers.

- b) Detail of manuals/instructions setting out procedures for airline/ground handling staff.

Ground Operations Manual and Passenger Handling Manual.

- c) Details of any training provided to airline or ground handling staff on the procedures.

Annual training is conducted which includes Reg261.

5) Airline procedures and processes for assessing compliance with the requirement to inform passengers of their legal rights during disruption

- a) Details of the 'pre-disruption' procedures and processes for ensuring compliance.

Station Work Place Inspections are conducted by our audit team. The audit includes checks of displayed signage, stock check of leaflets, and that refresher training has been completed.

- b) Details of the procedures and processes for assessing compliance during the disruption.

Mystery shopping checks are conducted. We ask our staff travelling with us to complete a questionnaire post flight and a question relating to the Reg261 rights leaflet is included in this questionnaire. Disruption reports are compiled and logged by our Customer Service Duty Coordinators after each disruption event. Our online database, which is used to record details of each flight, is also completed by handling agents and duty managers confirming that Reg261 rights information was handed about, the amount of leaflets distributed, by when and at what time.

- c) Details of the procedures and processes for assessing compliance after the disruption.

We have added a new category to our Customer Relations complaint database entitled "Reg261 rights not supplied." This will be selected by our Customer Relations advisors, if a complaint from a customer states that they were not given the rights information.

6) Airline procedures and processes for addressing issues with compliance with the requirement to inform passengers of their legal rights during disruption

- a) Details of the procedures and processes to ensure that the necessary action is taken to address any issues identified

As mentioned above, a category has been added to our Customer Relations complaints database to enable us to easily identify any complaint that refer to lack of Reg261 rights information. A monthly report will be produced from these complaints. Our Customer Service Manager will then investigate by following up with the Base Manager of the relevant airport for every individual complaint of rights information.

CAA comment	
Thomas Cook – Good	
Passengers carried in 2013	6 million
Estimated number of passengers affected by delays	140,000
Thomas Cook has put in place additional steps to strengthen its compliance oversight through introducing a new process to record and review data on information provision.	

1) **Airline Name**

Virgin Atlantic Airways Ltd

2) **UK airports where the airline operates from**

London Heathrow, London Gatwick, Manchester, (Glasgow, Belfast seasonal) Aberdeen, Edinburgh

3) **Mechanisms through which information is provided to passengers about their legal rights during disruption**

a) How, when and where hard copy information about passenger rights is provided

In accordance with Article 14(1)

The operating air carrier shall ensure that at check-in a clearly legible notice containing the following text is displayed in a manner clearly visible to passengers: ‘if you are denied boarding or your flight is cancelled or delayed for at least two hours, ask at the check-in counter or boarding gate for the text stating your rights, particularly with regard to compensation and assistance’.

A notice is placed at each of our check in desks. This notice is supplied by some EU based airport operators (e.g. London Heathrow). In the event the airport does not supply the notice or the airport is not in the EU we supply our own version (copy attached)

In accordance with Article 14(2)

An operating air carrier denying boarding or cancelling a flight shall provide each passenger affected with a written notice setting out the rules for compensation and assistance in line with this Regulation. It shall also provide each passenger affected by a delay of at least two hours with an equivalent notice. The contact details of the national designated body referred to in Article 16 shall also be given to the passenger in written form.

The written notice as required by the regulation is issued to passengers at the airport in the form of our “Compensation & Assistance” leaflet.

Our airport Procedures Manual details and directs our front line ground staff and any handling agents as to when the leaflet must be provided.

Compensation and Assistance Leaflet

The Compensation and Assistance leaflet must be given to customers in the following circumstances:

- Upon request (at Check in or Gate)
- Customers on flights delayed more than 2 hours
- Customers on a cancelled flight
- Customers denied boarding (voluntary or involuntary)
- Customers with reduced mobility and their travelling companions should be offered care (meals/refreshments) as soon as possible in the event of a flight delay/cancellation

- c) Whether the airline used electronic media channels to distribute information to passengers on their legal rights.

During any disruption we utilise our website and social media channels as an additional method to keep customers informed.

The customer service pages of our website contain information on 'Compensation and Assistance' in the event of denied boarding due to flight cancellation or delay.

We send advisory e-mail messages to customers on delayed or cancelled flights and we refer them to our website via links embedded in the e-mail. We use the e-mail address supplied at the time of booking if this is direct with us. Passengers who book indirectly will not necessarily have their details supplied by the agent but can supply this information at on-line check in. We encourage customers to share contact information with us so that we can ensure that we get any important messages to them. This will be up to 50% of the customers in a flight.

We also send out SMS messages to the customers we hold a mobile phone number for with the same information and links.

Our website contains two areas where passengers may find information in respect of their rights under EU261/2004: www.virginatlantic.com/customerservice and www.virginatlantic.com/euclaimapplication

All our customers will have an E-Ticket and featured on this are details of their rights

DENIED BOARDING COMPENSATION

For details of compensation and other benefits, to which you may be entitled if denied boarding for the flight for which you hold a confirmed reservation, please visit:
<http://www.virgin-atlantic.com/gb/en/travel-information/customer-service/conditions-of-carriage/article-9.html>

- d) Other means of informing passengers of their legal rights

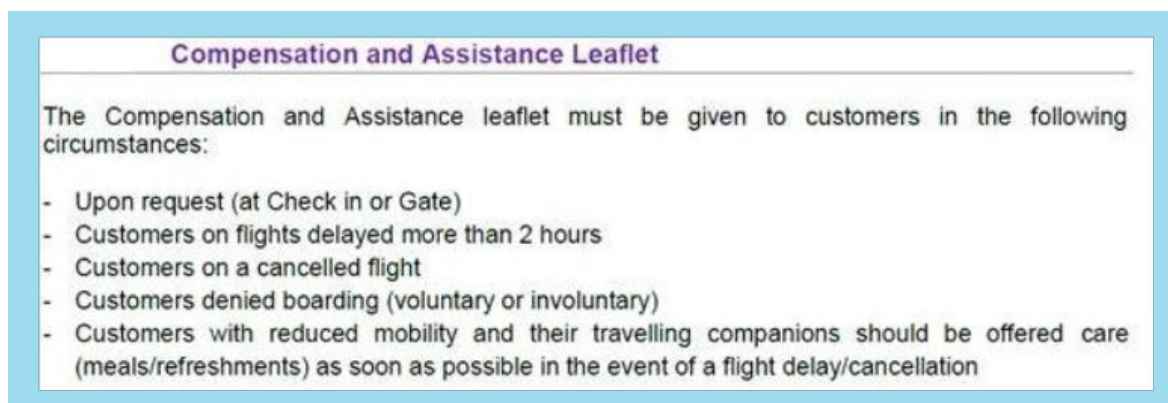
We may make announcements at the gate or on board depending on the circumstances in order to give further information about the delay. Leaflets will be made available at the gate for any delays over 2 hours.

4) **Airline procedures and processes for informing passengers of their legal rights during disruption**

- a) Job role(s) or team(s) accountable for compliance with Regulation EC261.

Overall the Airport Manager has responsibility for following policy and procedures. There will also be a Duty Manager who will be managing the operation on the day and especially involved in any disruption management. Should customers have any issues pre or post flight.

- b) Detail of manuals/instructions setting out procedures for airline/ground handling staff.



- c) Details of any training provided to airline or ground handling staff on the procedures.

All airport staff will undertake an initial training period of 2 weeks which will include disruption planning. Should any regulatory changes occur then they will receive the update and are required to sign to acknowledge that they have read and understood. They are supported in their ongoing on job training by experienced colleagues.

5) **Airline procedures and processes for assessing compliance with the requirement to inform passengers of their legal rights during disruption**

- a) Details of the 'pre-disruption' procedures and processes for ensuring compliance.

Article 14 (1) requires

The operating air carrier shall ensure that at check-in a clearly legible notice containing the following text is displayed in a manner clearly visible to passengers: 'if you are denied boarding or your flight is cancelled or delayed for at least two hours, ask at the check-in counter or boarding gate for the text stating your rights, particularly with regard to compensation and assistance'.

Airport teams check the stocks of the 'Compensation and Assistance' leaflets to ensure that we have a continued stock. Team meetings/shift briefings occur before each shift where any disruption and appropriate actions will be discussed.

- b) Details of the procedures and processes for assessing compliance during the disruption.

Our airport operations teams will conduct visits to each airport to ensure that policy and procedures are followed. During disruption however we want to ensure that all available staff are on hand to ensure customers receive the information and support they need. We ensure where possible we have identifiable staff available for customers and regular announcements at the gate or on the aircraft if this is where the customers are delayed.

We have also introduced additional measures. We will include a section on our airport duty manager log and gate report to record that the leaflets were handed out. This is then part of our records and will be reviewed by the airport teams to ensure this activity has been completed when required..

We believe it's important to our customers that any changes we make must meet their needs so as not to introduce processes that are inconvenient or disruptive to them.

- d) Details of the procedures and processes for assessing compliance after the disruption.

Virgin Atlantic encourages customer feedback and as we set the standards high our customers equally have high expectations of us. We welcome comments on our Facebook pages and Twitter accounts and have a dedicated social media team that responds to each message. This is in addition to our Customer Relations department. We take our customer feedback seriously. As a result we believe that we have a good understanding of what our customers want and where we need to improve.

We have a system to log complaints by category and surrounding the subject of Article 14 we have received less than 24 complaints between Aug 13 and Jul 14. We fly 5 – 6 million passengers a year.

6) Airline procedures and processes for addressing issues with compliance with the requirement to inform passengers of their legal rights during disruption

- a) Details of the procedures and processes to ensure that the necessary action is taken to address any issues identified

The information we have supplied will hopefully illustrate that this is not an area where we receive a high number of complaints but should this change then we have a system in place to address it accordingly. We also have a very vocal and well informed customer and at all points in their communications with Virgin Atlantic they have access to information about their rights.

CAA comment	
Virgin – Good	
Passengers carried in 2013	6 million
Estimated number of passengers affected by delays and cancellations	50,000
We welcome the steps taken by Virgin to strengthen its compliance oversight through introducing a new process to record and review data on information provision.	

- 1) **Airline Name**
Jet2.com Ltd
- 2) **UK airports where the airline operates from**
- 3) **Mechanisms through which information is provided to passengers about their legal rights during disruption**
 - a) How, when and where hard copy information about passenger rights is provided
 - b) Whether the airline used electronic media channels to distribute information to passengers on their legal rights.
 - c) Other means of informing passengers of their legal rights
- 4) **Airline procedures and processes for informing passengers of their legal rights during disruption**
 - a) Job role(s) or team(s) accountable for compliance with Regulation EC261.
 - b) Detail of manuals/instructions setting out procedures for airline/ground handling staff.
 - c) Details of any training provided to airline or ground handling staff on the procedures.
- 5) **Airline procedures and processes for assessing compliance with the requirement to inform passengers of their legal rights during disruption**
 - a) Details of the 'pre-disruption' procedures and processes for ensuring compliance.
 - b) Details of the procedures and processes for assessing compliance during the disruption.
 - c) Details of the procedures and processes for assessing compliance after the disruption.
- 6) **Airline procedures and processes for addressing issues with compliance with the requirement to inform passengers of their legal rights during disruption**
 - a) Details of the procedures and processes to ensure that the necessary action is taken to address any issues identified

CAA comment	
Jet2 – Below compliance standard	
Passengers carried in 2013	5.5 million
Estimated number of passengers affected by delays and cancellations	30,000
We have not received a contribution to the report from Jet2. We expect passengers will be disappointed that Jet2 does not seem equipped to give passengers the information they are legally entitled to during disruption. We have begun the legal phase of our enforcement process using our powers under Part 8 of the Enterprise Act 2002.	

1) Airline Name**Emirates****2) UK airports where the airline operates from**

LHR/LGW/MAN/BHX/NCL/GLA

3) Mechanisms through which information is provided to passengers about their legal rights during disruption

a) How, when and where hard copy information about passenger rights is provided

General information on passenger rights is displayed at all the airports we operate from and further more detailed information with respect to flight delays/cancellation is in the form of hard copy (Emirates corporate EU letters) which are provided to passengers as required. It is not logistically possible during a live flight disruption to ensure that every passenger irrespective of whether they require one or not receives a letter. Up to 40% of Customers check in on line and those without baggage never approach an Emirates check in desk.

b) Whether the airline used electronic media channels to distribute information to passengers on their legal rights.

We do not distribute Information on passenger rights electronically to individual passengers, however the information is available 24/7 on our website at www.emirates.com under link http://www.emirates.com/uk/english/plan_book/essential_information/rules_and_notices/rules_notices.aspx.

c) Other means of informing passengers of their legal rights

No PA announcements are made either at the airport or on board and we do not contact passengers to inform them of their rights under EC261 post flight. This would not be logistically possible anyway as we do not have direct contacts as the majority of our bookings come from the Travel Trade , and also they could be resident in any country in the world due to our extensive passenger network.

4) Airline procedures and processes for informing passengers of their legal rights during disruption

a) Job role(s) or team(s) accountable for compliance with Regulation EC261.

Airport Services Managers are responsible at each UK airport and at Head office in Dubai, Government and Industry affairs. VP UK is responsible for the UK.

- b) Detail of manuals/instructions setting out procedures for airline/ground handling staff.

For every delay we will have a central point for handing out EC261 letters. This could be at the point where the Customers collect their LRVs or meal vouchers for the delay or might be at the gate for the delayed flight. Enough letters are printed for all the customers and we reconcile after the flight to see how many remain to determine how many were accepted.

- c) Details of any training provided to airline or ground handling staff on the procedures.

All our main training is centralised in our Head Office (Dubai) training college and covers our global operation offering training to over 57,000 employees worldwide. As EC261 only applies to a limited part of our network this is not part of our main training. However local updates are conducted by our airport Managers to their station staff. This would also be highlighted at Staff refresher training/meetings especially if there are any changes to the legislation.

5) **Airline procedures and processes for assessing compliance with the requirement to inform passengers of their legal rights during disruption**

- a) Details of the 'pre-disruption' procedures and processes for ensuring compliance.

We ensure that we have sufficient stocks of the Emirates corporate EU information letters printed, and facilities are available at each airport to print any additional letters as required. We check regularly that all airport notices are up to date.

- b) Details of the procedures and processes for assessing compliance during the disruption.

Flight Disruption reports are completed for all delayed/cancelled flights and as well as standard facts they will also include any additional specific passenger handling issues or failures to be addressed, including information provided to passengers.

- c) Details of the procedures and processes for assessing compliance after the disruption.

All complaints received, including those relating to flight disruption are investigated and any service failures are then brought to the attention of the Management concerned to ensure that policies and procedures are amended/updated to ensure that should a similar incident, this specific failure does not reoccur. This would also include any specific complaints from a passenger with respect to not being provided with information on their passenger rights. We do not conduct post surveys with respect to whether all passengers have been provided with information on their rights as already explained in point 3 above.

6) Airline procedures and processes for addressing issues with compliance with the requirement to inform passengers of their legal rights during disruption

- a) Details of the procedures and processes to ensure that the necessary action is taken to address any issues identified

Already explained above in 5 i.e. through Customer Affairs and Service Audit

CAA comment	
Emirates – Taking steps to improve compliance	
Passengers carried in 2013	4.2 million
Estimated number of passengers affected by delays and cancellations	19,000
<p>We welcome the improvements Emirates is making to distributing leaflets to passengers and its oversight of compliance by recording and reviewing the provision of information. We will be working with Emirates to assess the effectiveness of these new processes and will provide an update in our next report.</p>	

1) Airline Name

Deutsche Lufthansa AG

2) UK airports where the airline operates from

LHR, LCI, BHX, MAN, EDI, ABZ, GLA (planned for summer 2015) JER (only during summer season)

3) Mechanisms through which information is provided to passengers about their legal rights during disruption

a) How, when and where hard copy information about passenger rights is provided

During electronic check-in via www.lh.com and when using check-in machines at the airport passengers are advised to ask for passenger rights as per EC 261/2004 in case their flight is cancelled or delayed by more than two hours or if they are denied boarding. At the check-in counters, ticket counters and in the gate area hard copy versions of passenger rights are available and will – upon request - be handed to each passenger affected by a disruption.

b) Whether the airline used electronic media channels to distribute information to passengers on their legal rights.

Passenger rights are displayed on Lufthansa's website www.lh.com. During electronic check-in via <http://www.lh.com> and when using check-in machines at the airport passengers are advised about passenger rights. Additionally, each mobile boarding pass issued (present rate of mobile boarding passes issued for travel ex UK is 15 to 20 percent, rate to be increased) contains a link to passenger rights on website.

Prospect: It is our intention to link information on passenger rights to irregularity messages sent to passengers of disrupted flights.

c) Other means of informing passengers of their legal rights

Passengers are informed on an individual basis by ground staff.

4) Airline procedures and processes for informing passengers of their legal rights during disruption

a) Job role(s) or team(s) accountable for compliance with Regulation EC261.

At the airport: LH Station Manager is responsible to guarantee that provisions of EC rule 261/2004 are adhered to by all service staff members.

At head office: Product Management Passenger Processes describes all processes and provides all documents and service manuals/training material to implement EC 261 provisions in daily business.

At head office: Customer Relations Representative as Contact Person for National Enforcement Bodies.

- b) Detail of manuals/instructions setting out procedures for airline/ground handling staff.

Passenger Service Manual (PSM).

Global work instructions (GWI) on EC 261/2004.

- c) Details of any training provided to airline or ground handling staff on the procedures.

Providing information about passenger rights to passengers of disrupted flights is an integral part of Lufthansa's training for airport service staff on handling of flight irregularities. When we cooperate with ground handling companies, as is the case in the UK, the service staff members receive the handling agent's training of approx. 2 weeks and then an airline specific training of 2-3 days in the classroom followed by "shadowing" on the job. LH specific training includes irregularity handling.

5) **Airline procedures and processes for assessing compliance with the requirement to inform passengers of their legal rights during disruption**

- a) Details of the 'pre-disruption' procedures and processes for ensuring compliance.

Product Management Passenger Processes describes the worldwide procedures and designs posters and electronic notices that are to be displayed at the airport counters, printed on boarding passes or displayed on website. They have brochures produced in various languages. They set standards for training sessions for customer service agents. Station Manager includes these procedures into ground handling contracts if passenger service is provided by third party.

- b) Details of the procedures and processes for assessing compliance during the disruption.

Passenger service in case of disrupted flights is supervised by LH staff member if ground handling is done by third party. UK stations have lately introduced a report on irregularity handling that is to be filled in, in case of flight disruptions.

- c) Details of the procedures and processes for assessing compliance after the disruption.

If during passenger complaint handling LH receives the information that a passenger was not or not sufficiently advised about passenger rights, this incident will be taken up with the Station Management concerned to avoid recurrence.

German National Enforcement Body LBA performs spot checks on the premises to guarantee that EC 261 passenger rights are kept during disruptions.

During complaint handling of passenger claims or claims brought to the knowledge of NEB each single case of alleged non-compliance with Art 14 provisions will be researched, evaluated and taken up with responsible Station Management.

If this evaluation shows that a described process is faulty, it will be corrected immediately.

6) Airline procedures and processes for addressing issues with compliance with the requirement to inform passengers of their legal rights during disruption

- a) Details of the procedures and processes to ensure that the necessary action is taken to address any issues identified

Lufthansa's Contact Person for NEBs will take up any reported deficiency or any official request for adjustment of procedures with Product Management Passenger Processes and/or Station Management. In case of wrong-doing during passenger service, additional information/training will be prescribed. If a described process proves to be ineffective/faulty, it will be corrected immediately with worldwide effect.

CAA comment	
Lufthansa – Taking steps to improve compliance	
Passengers carried in 2013	3.5 million
Estimated number of passengers affected by delays and cancellations	80,000
We welcome the steps Lufthansa is taking to improve distribution of electronic information to its passengers. We also welcome the improvements to compliance oversight through the introduction of a new disruption report. We will be working with to assess the effectiveness of these changes and will provide an update in our next report.	

1) Airline Name**Aer Lingus Limited****2) UK airports where the airline operates from**

London Heathrow, London Gatwick, Belfast City Airport, Birmingham and Manchester.

3) Mechanisms through which information is provided to passengers about their legal rights during disruption

a) How, when and where hard copy information about passenger rights is provided

The provisions of hard copy information to our passengers informing them of their rights is ensured by:

- i) having the Regulation (EC) No 261/2004 (the "Regulation") Article 14 (1) notice displayed at check-in at all times;
- ii) keeping a supply of paper form Article 14 (2) notices available to hand at desks; and
- iii) in the event of depletion of stocks of notices at desks, maintaining the facility in our ground operations portal for front line staff to immediately reprint as many notices as required.

b) Whether the airline used electronic media channels to distribute information to passengers on their legal rights.

Aer Lingus uses electronic media channels to distribute information to our passengers on their legal rights. We do this by means of:

- i) maintaining a permanent presence on our website of the denied boarding, cancellation and delay notices and information required pursuant to Article 14(2);
- ii) a link to the information contained in our Article 14(2) notices will shortly be provided in every confirmation e-mail which Aer Lingus sends on foot of a reservation to travel. These e-mails will contain the advice that if a passenger's flight is cancelled or subject to a long delay, or if the passenger is denied boarding, the text of their rights under Regulation 261/2004 is available by clicking a hyperlink.

All passengers providing an e-mail address in the course of a reservation or any passenger seeking the relevant information from our website, will receive the information.

c) Other means of informing passengers of their legal rights

Where airport authorities permit such PA announcements and where practical in the context of the circumstances of the disruption event itself, our announcements to passengers at the boarding gate for the provision of care and assistance may be augmented by the addition of a reminder that copies of the Article 14(2) notice may be collected with vouchers and other arrangements for such care and assistance.

4) **Airline procedures and processes for informing passengers of their legal rights during disruption**

- a) Job role(s) or team(s) accountable for compliance with Regulation EC261.

Our Ground Operations and Legal Departments as well as Regional Operations Managers at EU airports.

- b) Detail of manuals/instructions setting out procedures for airline/ground handling staff.

Our Commercial Policies & Procedures and Ground Operations Manuals as well as the ongoing assistance and instructions of our Legal Department.

- c) Details of any training provided to airline or ground handling staff on the procedures.

Training and instruction varies considerably in line with staff category and function with the airline.

5) **Airline procedures and processes for assessing compliance with the requirement to inform passengers of their legal rights during disruption**

- a) Details of the 'pre-disruption' procedures and processes for ensuring compliance.

In terms of monitoring compliance with our responsibilities:

- i) the Aer Lingus legal, ground operations and customer relations departments maintain oversight of, and compile information in relation to, our responsibilities under the Regulation;
- ii) Aer Lingus airport ground operations are regularly inspected by national enforcement bodies throughout Europe. Aer Lingus welcomes relevant findings (to the extent that any findings are made known to us by national enforcement bodies) and use those findings to manage our continuing compliance with the Regulation. This approach to monitoring our compliance is of key importance and ultimately of benefit to our passengers, given the variation of interpretation of the Regulation across European member states.

- b) Details of the procedures and processes for assessing compliance during the disruption.

See above.

- c) Details of the procedures and processes for assessing compliance after the disruption.

See above.

6) **Airline procedures and processes for addressing issues with compliance with the requirement to inform passengers of their legal rights during disruption**

- a) Details of the procedures and processes to ensure that the necessary action is taken to address any issues identified

See above.

CAA comment	
Aer Lingus - Below compliance standard	
Passengers carried in 2013	3.3 million
Estimated number of passengers affected by delays (we do not have data on Aer Lingus cancellations)	10,000
<p>Aer Lingus has told us it does not pro-actively provide information to passengers during disruption. It does not appear to oversee compliance itself, but relies on inspections by National Enforcement Bodies. We expect passengers will be disappointed by this approach. We have begun the legal phase of our enforcement process using our powers under Part 8 of the Enterprise Act 2002</p>	

1) Airline Name**Air France KLM****2) UK airports where the airline operates from**

London Heathrow, Aberdeen, Birmingham, Bristol, Cardiff, Durham Teesside, Edinburgh, Humberside, Glasgow, Leeds Bradford, Manchester, Newcastle, Norwich

3) Mechanisms through which information is provided to passengers about their legal rights during disruption**a) How, when and where hard copy information about passenger rights is provided**

During a disruption, letters are distributed to passengers at the airport showing all the options passengers have in terms of re-bookings or refunds. The Care and Assistance rights are explained and passengers are referred to the websites where a copy of the Compensation and Assistance flyers can be accessed and downloaded. A Compensation and Assistance flyer is handed to passengers at the same time. The Compensation and Assistance flyers are also displayed at check-in and at tickets desks (for those airports having ticket desks). The flyers are also available at the gate for transfer passengers.

b) Whether the airline used electronic media channels to distribute information to passengers on their legal rights.

The Care and Assistance flyers are available on both Air France and KLM websites. Passengers who make their bookings on-line via Airfrance.com and KLM.com have access to this information.

The 'Air France and KLM Connect' tool contacts passengers pro-actively in the event of a disruption to their flight via a text message and an e-mail. The text message does not have enough space to refer to passengers' rights. E-mails however state 'In accordance with Regulation EU261/2004, Air France KLM will provide care and assistance which is explained on our websites under Contact us and Claims (AF) and Customer Support/ refund and compensation (KLM)'.

Passengers who have provided their mobile phone/email address are contacted via these channels.

c) Other means of informing passengers of their legal rights

VIP passengers who have booked via the VIP Desk are contacted after their trip with Air France KLM by a dedicated VIP Desk are asked how their journey went and in the event of a delay of more than 3 hours at arrival will automatically be told of their rights under EU261/2004 and offered compensation pro-actively.

4) **Airline procedures and processes for informing passengers of their legal rights during disruption**

- a) Job role(s) or team(s) accountable for compliance with Regulation EC261.

The Operational Compliance Executive reporting to the Station Manager responsible for all stations in the UK and Ireland ensures that all local and airline regulations are followed through and manned properly. This person ensures compliance to EU261/2004 in terms of information to passengers about their rights and welfare and re-routing in the event of a disruption.

- b) Detail of manuals/instructions setting out procedures for airline/ground handling staff.

The Passenger Airport Manual consulted by staff and ground handling personnel sets out the following instructions:

EU Regulation 261/2004 mandates airlines based in an EU member state to inform customers about their rights in case of cancellations, delays, downgrading and denied boarding. For AF/KL this is translated into the Assistance and Compensation flyer. This flyer must be provided proactively to the customer in case of:

- Cancelled flight
- Delayed flight
- Downgrading
- Involuntary denied boarding
- In case of voluntary denied boarding provide the flyer on the customer's request.

In addition to the Assistance and Compensation leaflet, the customer may always be referred to Air France.com or KLM.com website (Customer Support/You can count on KLM). The leaflets should be available at all ticket desks, Service Recovery desks and Gates.

- c) Details of any training provided to airline or ground handling staff on the procedures.

Regular reminders are sent by the Station Manager to the Ground handling team and a written reminder is sent if non-compliance is identified.

5) **Airline procedures and processes for assessing compliance with the requirement to inform passengers of their legal rights during disruption**

a) Details of the 'pre-disruption' procedures and processes for ensuring compliance.

Regular emails from Station Manager in charge of all stations in Great-Britain and Ireland to direct reports responsible for Heathrow airport and regional airports requesting that all UK airports have a sufficient stock of 'Assistance and Compensation' Flyers available at all times and asking the Ground Handling companies in the different stations to carry stock checks and send an e-mail to the Operational Compliance Executive with the amount needed for each station.

Individual station Managers are also reminded every two months to ensure that the Ground Handling agents are fully aware of the importance of utilizing these leaflets in accordance with guidelines set out in the Passenger Airport Manual. Leaflets must be located at the ticket offices, Service Recovery Desk for Stations without a ticket office and gate area for transfer passengers. All stations are advised that Air France KLM's Operational Compliance Executive will carry out these quarterly checks. Ground Handling Agents will be asked at check in to produce these leaflets to show their availability at all times.

In the event of disruptions, the Ground Handling agents must notify the Air France KLM station Manager on how customers and the disruption were handled. This must be done after the flight departure and disruption handling and the message must contain mandatory information such as the flight number and date, the cause of disruption, the announcements made, the number of customers rebooked, the care and assistance provided + assistance and compensation brochure provided and any major incidents involving customers

This important information is added on the agenda of the Performance Reviews with Ground handling agents to ensure it gets maximum exposure and Air France KLM uses this opportunity to stress further the importance of consistent and smooth handling in the event of disruption.

b) Details of the procedures and processes for assessing compliance during the disruption.

Audits cover questions relating to the compliance of EU261 in terms of care and Assistance, provision of information and welfare and re-routing are now included in the EU operational Safety Audits.

Weekly reports are sent from the Ground Handling companies and Air France KLM request the Ground handling companies to report on whether the Care and Assistance flyers have been distributed in the event that a flight was delayed by more than 2 hours.

- c) Details of the procedures and processes for assessing compliance after the disruption.

In the event of disruptions, ground Handling must notify Air France KLM to advise how customers & the disruption were handled. This must be done after flight departure and disruption handling and the message must contain the mandatory information such as such as the flight number and date, the cause of disruption, the announcements made, the number of customers rebooked, the care and assistance provided + assistance and compensation brochure provided, any major incidents involving customers. This now includes a specific request of whether passengers were advised on their rights under EU261.

Additionally, from 1 December 2014, Air France and KLM Headquarters are building a log specifically on compliance with EU261/2004 after every disruption.

Air France KLM is looking into the feasibility of having regular e-surveys to monitor adherence to quality standards including passengers' rights more specifically.

6) **Airline procedures and processes for addressing issues with compliance with the requirement to inform passengers of their legal rights during disruption**

- a) Details of the procedures and processes to ensure that the necessary action is taken to address any issues identified

Stations have monthly meetings with the ground handling companies and Air France KLM will ensure that the airline's responsibility under EU261 is brought up at each meeting. If the quarterly audit identifies non-compliance on any issue, this is brought up at the monthly meeting following the audit and a written reminder is sent. During these meetings minutes are taken which are available at each station.

CAA comment	
Air France KLM – Good	
Passengers carried in 2013	3.3 million
Estimated number of passengers affected by delays and cancellations	42,000
Air France KLM has taken steps to strengthen its compliance oversight, in particular through a new audit process for information provision.	

1) Airline Name**Wizz Air Hungary Ltd****2) UK airports where the airline operates from**

London – Luton (LTN)

Liverpool (LPL)

Doncaster/Sheffield (DSA)

Glasgow (GLA)

3) Mechanisms through which information is provided to passengers about their legal rights during disruption**a) How, when and where hard copy information about passenger rights is provided**

Wizz Air outsources its passenger handling to its ground handling agents at the airports to which it operates. Wizz Air's standard ground handling agreement, entered into with each ground handling agent, requires that the ground handling agent applies the procedures set out in Wizz Air's Passenger Handling Manual (PHM). The procedures set out in the Passenger Handling Manual include, amongst others, those to be followed for delayed or cancelled flights.

PHM 6.1.6:

The handling agent shall ensure that at check-in a clearly legible notice containing the following text is displayed in a manner clearly visible to passengers:

"If you are denied boarding or if your flight is cancelled or delayed for at least two hours, ask at the check-in counter or boarding gate for the text stating your rights, particularly with regard to compensation and assistance".

It is a mandatory requirement according to EU legislation and therefore must be adhered to!

THE IMPORTANCE OF KEEPING PASSENGERS INFORMED CANNOT BE OVER-EMPHASISED.

If a flight is delayed for more than 2 hours or cancelled, all affected passengers are given information letters explaining their options. If a passenger is denied boarding, then that passenger is given a copy of the denied boarding letter. Obligations are defined in PHM 6.4.1. (See question 4.)

- b) Whether the airline used electronic media channels to distribute information to passengers on their legal rights.

Wizz Air still uses hard copy letters for passenger rights notification. We use other forms of electronic media (SMS and email) to ensure our passengers are given maximum information about potential delay proactively. Just to highlight/stress, these SMS and emails are used for supporting passenger communication and customer service quality and are not used to replace the currently used method of hard copies for informing passengers about their rights as per Regulation 261/2004.

- c) Other means of informing passengers of their legal rights

Whenever assistance is required by Regulation 261/2004 to be provided to passengers, an announcement is made at the airport to advise all affected passengers about the availability of vouchers and information letters.

All affected passengers are given information letters explaining their options. (See question 3.)

4) Airline procedures and processes for informing passengers of their legal rights during disruption

- a) Job role(s) or team(s) accountable for compliance with Regulation EC261.

At the airport: contracted outsourced ground handling agents

At Head Office: Customer Service team

- b) Detail of manuals/instructions setting out procedures for airline/ground handling staff.

Ground handling staff must follow the procedures written in Wizz Air's Passenger Handling Manual (PHM). It is clearly stated that if a flight is delayed for more than 2 hours or cancelled all affected passengers must be given information letters explaining their rights and options.

PHM 6.4.1:

All passengers MUST be given the information letters on delay from Wizz Air explaining their options whenever a flight is delayed over 2 hours. This is a mandatory requirement according to EU Legislation and therefore must be adhered to. A flight shall be deemed as delayed if it is rescheduled, even if the new departure time is on the day after the planned departure time. In all cases if the flight is not cancelled (if a flight is cancelled the next available flight is only the next flight in the schedule) the information letters on delays has to be distributed to the passengers!

PHM 6.6.1:

All passengers MUST be given the information letter on cancellation from Wizz Air explaining their options (even if before the flight was announced as delayed and therefore the information letters on delay have already been distributed). This is a mandatory requirement according to EU Legislation and therefore must be adhered to

In addition to provided training and contractual obligations of the ground handling supplier to give information on legal rights during disruption, Wizz Air uses several channels of live communication to ensure that its suppliers are informed immediately and act in a timely manner to ensure that all issues are addressed. First, as soon as a delay is known, SITA messages are sent by the Operations Control Center (OCC) to all affected ground handling suppliers with ETD and information is communicated on Wizz Air internal distribution mailing list. Second, as soon as the internal communication is done by OCC, Wizz Air Call Center dedicated airport hotline service calls duty manager of each affected ground handling supplier and confirms that ground handling supplier shall follow Wizz Air standard recovery procedures (including information rights) and reports on the same internal distribution mailing list that recovery procedures were confirmed. Third, relevant Ground Operations manager (responsible for the specific supplier) calls duty manager or service delivery manager of the ground handling supplier to discuss the situation and double check that all recovery procedures (including information rights) are properly followed and find out if there are any customer inconveniences to decide on further customer service actions. In airports, where Wizz Air has physically based ground operations managers the last (third) process is done in person, subject to time of the day and availability of the based ground operations manager.

- c) Details of any training provided to airline or ground handling staff on the procedures.

Disruption management training is part of the station set-up training provided to the ground handling companies prior to start of operations. Most typically, the company uses the concept of “train the trainer” in order to ensure full coverage of training for all staff. In certain cases, Wizz Air trains all supplier staff itself. The length of training varies between 2-5 days depending on the size of the operation and subsequently staff size of the supplier. The training is done prior to start of operations and is repeated by trained trainers as “refresher training” for staff with frequency based on local regulations (typically 2 years).

5) **Airline procedures and processes for assessing compliance with the requirement to inform passengers of their legal rights during disruption**

- a) Details of the ‘pre-disruption’ procedures and processes for ensuring compliance.

Display of passenger related notices are required by existing supplier agreements and are continuously verified through mystery passenger inspections. Display of such notices are also governed by local regulations EU wide and adhered to by majority of Wizz Air suppliers as ground handling companies operating in EU environment. There is no stock of leaflets to be used, as ground handling suppliers are provided electronic file of the information rights leaflets, which are printed when required and in the amount required.

Wizz Air customer relations center keeps record of passenger claims/complaints about insufficient information, which are transferred to Wizz Air ground operations team and verified with specific supplier in question. This process is continuous and involves ongoing sharing of information between customer services and ground operations teams. Each time a complaint is registered by Wizz Air customer relations center or Wizz Air crew from a passenger about insufficient/lack of information, the complaint content is shared to the relevant ground operations manager, who follows it up with the relevant supplier on the ground (i.e ground handling agent). Each case is investigated thoroughly and begins with a report from the supplier about reasons for under-performance and immediate corrective actions to be implemented along with relevant timelines. These actions and timelines are reviewed and accepted by the relevant ground operations manager and followed up to verify their implementation. In certain cases, further corrective actions or detailed proofs of compliance may be requested from the supplier to ensure that implemented corrective action is sustainable and effective.

- b) Details of the procedures and processes for assessing compliance during the disruption.

In order to monitor the proper distribution of information letters and vouchers by the ground handling agent, passengers are requested to sign a form to confirm they have received the relevant items. The form must be send to Wizz Air by the ground handling agent in order to prove the performance of its obligations defined in its standard ground handling agreement with Wizz Air.

- c) Details of the procedures and processes for assessing compliance after the disruption.

In order to ensure compliance we require the ground handling agent to provide us the forms signed by the passengers confirming the receipt of the information letters and meal vouchers as required by the Regulation 261/2004.

6) Airline procedures and processes for addressing issues with compliance with the requirement to inform passengers of their legal rights during disruption

- a) Details of the procedures and processes to ensure that the necessary action is taken to address any issues identified

In case of non-compliance by one of its suppliers, Wizz Air has a standard process of collecting information about non-compliance through passenger complaints to Wizz Air customer relations center or Wizz Air crew and following up to the supplier in question by the Wizz Air ground operations manager to investigate the occurrence. Investigation consists of several stages including report on occurrence and reasons behind it, determination of corrective actions and follow up for ensure corrective actions are implemented, effective and sustainable.

CAA comment	
Wizz Air – Very Good	
Passengers carried in 2013	2.9 million
Estimated number of passengers affected by delays and cancellations	31,000
Wizz Air has demonstrated it exceeds the minimum compliance standard in that it has a range of processes in place to oversee compliance and to ensure passengers receive the information they need on their rights during disruption. Of particular note is Wizz Air's requirement that passengers sign a form to confirm they have received the relevant assistance under the Regulation, including information on rights.	

1) Airline Name**United Airlines, Inc.****2) UK airports where the airline operates from**

Belfast, Birmingham, Edinburgh, Glasgow, London Heathrow, Manchester.

3) Mechanisms through which information is provided to passengers about their legal rights during disruption

a) How, when and where hard copy information about passenger rights is provided

We pro-actively distribute a hard copy of our Notice of Regulation 261 rights (“Notice of Rights”) at check-in and at the gate to all passengers on flights departing the UK who are affected by denied boarding, cancellations or long delays within the scope of the Regulation.

b) Whether the airline used electronic media channels to distribute information to passengers on their legal rights.

N/A

c) Other means of informing passengers of their legal rights

N/A

4) Airline procedures and processes for informing passengers of their legal rights during disruption

a) Job role(s) or team(s) accountable for compliance with Regulation EC261.

Confidential information redacted.

b) Detail of manuals/instructions setting out procedures for airline/ground handling staff.

Within 24 hours of a travel disruption that falls within the scope of Regulation 261, the airport’s General Manager (“GM”) or airline designee completes a report using a web-based tool. All areas of this report must be filled out, including whether the Notice of Rights was handed out to affected passengers. The GM or designee reviews the completed form at the time it is submitted to ensure compliance. In addition, Airport Operations in our Chicago HQ (“AO”) reviews all reports from the field. As needed, AO follows up with the GM, Supervisors and Leads at any United station to reinforce United’s policy of proactively distributing the Notice of Rights to affected customers. AO sends instructions to UK and other EU stations as needed on compliance with our obligations under Regulation 261.

- c) Details of any training provided to airline or ground handling staff on the procedures.

In the event of a travel disruption within the scope of Regulation 261, the United representative working the flight reminds airport staff and ground handlers of the requirement to pro-actively distribute the Notice of Rights. In addition, at regular meetings with UK airport staff and ground handlers, the notice requirement is a re-occurring agenda item as UA GMs address issues relating to compliance with Regulation 261, including the requirement to pro-actively distribute the Notice of Rights to affected passengers.

5) **Airline procedures and processes for assessing compliance with the requirement to inform passengers of their legal rights during disruption**

- a) Details of the 'pre-disruption' procedures and processes for ensuring compliance.

At each of our UK stations, the GM or an airline designee is tasked with the responsibility for ensuring that the Article 14(1) notice is displayed at check-in desks. The GM or airline designee is also responsible for ensuring that there are sufficient copies of the Notice of Rights available. We also have the ability to print additional Notices of Rights at each of our stations.

- b) Details of the procedures and processes for assessing compliance during the disruption.

Within 24 hours of the disruption, the GM or airline designee completes a report using a web-based tool. All areas of this report must be completed, including whether the Notice of Rights was distributed to affected passengers. The GM or designee reviews the completed form at the time it is submitted to ensure compliance. In addition, AO reviews all reports from the field and follows up with local GMs as needed.

- c) Details of the procedures and processes for assessing compliance after the disruption.

In the event of non-compliance with Regulation 261, including the failure to distribute the Notice of Rights, AO contacts the GM, Supervisors and Leads at the station to ensure all are aware of the non-compliance and to discuss the action needed to avoid a recurrence. Our Customer Care department also provides information to AO about complaints it receives directly from customers, including the failure to provide the Notice of Rights. AO raises these complaints with the relevant station as described above.

6) **Airline procedures and processes for addressing issues with compliance with the requirement to inform passengers of their legal rights during disruption**

- a) Details of the procedures and processes to ensure that the necessary action is taken to address any issues identified

The procedures in place for addressing failure to distribute Notices of Rights in the event of a travel disruption within the scope of Regulation 261 are described above. Issues can also be addressed through further staff instruction/training on the information distribution requirement.

CAA comment**United – Good**

Passengers carried in 2013	2.6 million
----------------------------	-------------

Estimated number of passengers affected by delays and cancellations	55,000
---	--------

United has taken steps to improve its compliance oversight through recording and reviewing the provision of passenger leaflets.