

Guidance for airlines on assisting people with hidden disabilities

CAP 1603



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Introduction

1. In November 2016, the CAA published guidance for UK airports on providing assistance to people with hidden disabilities ([CAP1411](#)). We are now publishing similar guidance for airlines applicable to all flights from the UK and for flights to the UK on an EU registered airline. This guidance for airlines complements CAP1411. This guidance has been produced following discussions with a number of key disability organisations and a range of airlines. It has also been produced following in depth research by the CAA into the current processes used by airlines and airports to capture and transmit information about passengers' assistance needs when travelling by air. The results of this research have helped inform this guidance, particularly Chapter 2.
2. The aim of Regulation EC1107/2006 (the Regulation) concerning the rights of disabled persons and persons with reduced mobility when travelling by air is to ensure that disabled people have the same opportunities for air travel as non-disabled people, in particular that they have the same rights to free movement, freedom of choice and non-discrimination. The Regulation covers “any person whose mobility when using air transport is reduced due to any physical disability (sensory or locomotor, permanent or temporary), **intellectual disability or impairment**, or any other cause of disability, or age”. It is the CAA’s view, based on engagement with disability organisations, that hidden disabilities should be considered to include, but not be limited to, dementia, autism, learning disabilities, anxiety issues, mental health conditions, visual impairments and hearing loss. Hidden disabilities should also be considered to include non-visible physical disabilities such as epilepsy, respiratory conditions and chronic pain.
3. The CAA acknowledges that there are already examples of good practice by airlines. The purpose of this guidance is to build on the existing good practice by clarifying the requirements of the Regulation (in light of the relevant guidance from the CAA, the European Commission and European Civil Aviation Conference (ECAC)) and making recommendations on best practice, where appropriate, in relation to providing assistance to people with hidden disabilities. This includes communication of information prior to travel and at the airport; obligations in regard to “pre-notification”; assistance at the airport for areas that are the responsibility of the airline; direct assistance onboard the aircraft; and assistance during flight disruptions. Although this is specific guidance on the Regulation, the CAA notes that it is good practice, and indeed would represent good customer service, for airlines to understand how hidden disabilities can affect passengers' experience of the whole customer journey and the implications of this for the service they provide. The CAA would support, and indeed encourage, airlines and airports to consider opportunities to go beyond

the requirements of the regulation and the guidance in the service they provide to passengers with hidden disabilities.

Chapter 1

Prevention and refusal of carriage

- 1.1 An airline's priority must always be the safety of its passengers and crew.
- 1.2 Under the Regulation
 - a. Article 3 states that an airline, its agent or a tour operator must not refuse travel on the grounds of disability or reduced mobility unless it must do so to meet applicable safety requirements (Article 4).
 - b. Article 4.2 allows airlines to request that a person be accompanied by another person who is capable of providing assistance.
 - c. Article 4.3 states that carriers must make publicly available, in accessible formats, the safety rules that it applies to the carriage of disabled people and persons with reduced mobility.
- 1.3 Due to the diverse nature of the needs of people with hidden disabilities, and also because the disabilities may not be immediately obvious, it is important that any decisions to refuse travel are taken from an informed viewpoint. For example, processes for medical clearance and safety restrictions should have regard to people with hidden disabilities. Receiving early, and good quality, information, through pre-notification more than 48 hours before travel is particularly important. Information on restrictions on travel as a result of safety rules should be provided through a variety of media. (See paragraph 2.7).
- 1.4 It can sometimes be the case that, when under stress, a person with a hidden disability can exhibit certain challenging behaviour. The CAA is aware of a number of instances where this has led to the passenger being denied boarding. In instances where such challenging behaviour arises, it is important for airlines to be able to identify that the person has a hidden disability and to take the appropriate action to understand and deal with the underlying issue. Having appropriately trained cabin and flight crew, as well as good quality and timely pre-notification information, is key to this. Using a discrete identifier, such as a lanyard, may also help.

Chapter 2

Information and communication prior to travel, at the airport and onboard the aircraft

- 2.1 The Regulation states that “In order to give disabled persons and person with reduced mobility opportunities for air travel comparable to those of other citizens, assistance to meet their *particular* needs should be provided at the airport as well as onboard aircraft”. People with hidden disabilities have a diverse range of needs. Further, people with a non-physical disability can also have a physical disability. Therefore, in order to ensure that the assistance provided will meet the person’s particular needs throughout the entire journey, it is critical that individuals are able to provide sufficient information on their assistance needs to the airline, their agent or the tour operator and that, in turn, the airline, their agent or the tour operator is able to pass on this information to both the airport (either directly or to the supplier contracted at that airport to provide the assistance) and to the airline. It is critical also for airports and airlines to be able to pass this information on within their own organisations to ensure that all relevant staff are appropriately informed.
- 2.2 Under Article 6 of EC Regulation 1107/2006, airlines, their agents and tour operators must “take all measures necessary [...] at all their points of sale” to receive information on the assistance needs of individuals. Airlines, their agents and tour operators therefore must have systems and processes in place to gather this information from an individual at all points of sale. In terms of how this additional information is gathered in practice, airlines can build on existing processes by, for example, collecting it as part of the online booking process or through a post booking ‘call back’, email, or similar. Individuals should be able to provide this information without additional charge.
- 2.3 Given that people with hidden disabilities have a diverse range of needs, and that people with a non-physical disability can also have a physical disability, it is the CAA’s view that the information gathered from the individual will generally need to go beyond that required to simply classify the individual’s needs according to the commonly used IATA classification system. It is open to airlines to develop their own systems for recording the assistance needs of individuals, so long as these systems are effective in recording the *particular* assistance needs of the individual. This could include additional classifications which go beyond the existing IATA classification system. However, such an approach would be unlikely to be able to cover the diverse range of needs of people with hidden disabilities. Therefore, airlines will need to be able to gather and record

additional information to that covered by the IATA codes to enhance the information that is recorded about an individual's *particular* assistance needs.

- 2.4 The infrastructure to record and pass on free text messages already exists in the form of the SITA electronic messaging system and is already widely used by airlines. ECAC DOC 30 Section 5.3.2 states that “In order to provide the appropriate assistance, the air carrier should inform on the actual needs of the passenger using the ‘free text’ box, visible in the messaging system between airlines and airports (PAL/CAL messaging). This is particularly useful in the case of passengers with invisible disabilities.” Annex 5H also states that “the diverse needs of people with hidden disabilities puts significant emphasis on airlines having in place systems that are able to pass on extra information contained within PAL and CAL messages (or other means), in addition to general IATA assistance codes”. The CAA recommends that airlines use this existing system in order to record and pass on information on the assistance needs of individuals, including in the form of free text. However, the CAA acknowledges that there may be other methods for passing on information about the assistance needs of passengers which may be equally effective.
- 2.5 Airlines, their agents and tour operators must be able to pass on information about an individual's assistance needs within their own organisations, as well as to the airport or service provider. Airlines and airports should have systems and processes in place to ensure that all the information about an individual's assistance needs is recorded and can be passed on to relevant staff. In the case of airlines, this includes staff working at the airport, whether the airline's own or contracted staff (e.g. ground handlers), and onboard the aircraft (i.e. cabin and flight crew). Ideally, all the information about an individual's assistance needs should be associated with the individual's reservation so that all relevant passenger facing staff have access to it through all stages of the passenger journey.
- 2.6 Given the importance of ensuring that disabled passengers receive the assistance that meets their needs, it may be appropriate for airline staff or their contracted ground handlers to re-confirm the information when they first come into contact with the passenger at the airport. However, it should be borne in mind that it can be frustrating for disabled passengers to have to explain their needs repeatedly at different points in the journey. It should therefore be unnecessary for disabled passengers to provide this information more than once, unless their assistance needs have changed since the airline was first notified.
- 2.7 Under the Regulation airlines must ensure that disabled people and those with mobility restrictions receive “communication of essential information concerning a flight in accessible formats”. Passengers have a responsibility to make sure that they provide information about their assistance needs to airlines. But clearer and more detailed information on the assistance available for people with hidden

disabilities should help to give people greater confidence that the assistance available will meet their individual needs. Airlines should therefore present this information on their websites in a clear and easy to understand way. This could be in the format of videos, photos and pictures. This will aid with familiarisation with air travel and may help ease anxiety and stress for the passenger. It will also encourage pre-notification. At the airport, airline staff, or those contracted by the airline, should make provision for people who are less able to use visual displays or audible announcements by communicating this information in person when possible.

Chapter 3

Boarding and onboard the aircraft

- 3.1 It is usual practice for disabled passengers and those with reduced mobility to be boarded first. Whilst this practice is generally beneficial to people who need extra assistance, it may not be appropriate for all passengers, especially if boarding is not immediate and passengers are left waiting in unfamiliar surroundings (such as on an airbridge). We recommend the ground staff allow passengers with hidden disabilities to board last if reasonable and practicable.
- 3.2 Under the Regulation, carriers must make all “reasonable efforts to arrange seating to meet the needs of individuals with disability or reduced mobility on request subject to safety requirements and availability”. Because the needs of people with hidden disabilities are diverse, airlines should adapt their seating policies to incorporate such requests (for example, a person might need to sit near a window to ease anxiety and stress). Accommodating such seating requests may require the airline to move other passengers. In order to avoid this situation, airlines should seek information on seating needs as early as possible.
- 3.3 Under the Regulation, carriers must make all “reasonable efforts” to seat an accompanying person next to a person with hidden disabilities. Notwithstanding any safety considerations, it is particularly important that people with hidden disabilities are not separated from accompanying persons; to do so may cause significant anxiety and distress. A person with a hidden disability who travels without an accompanying person should be allocated seats so that visual and audible communication can be established with the cabin crew (ECAC Doc 30 Annex 5F section 6.2c).
- 3.4 The allocation of seats to people with hidden disabilities and accompanying persons should be done at no extra cost to the individuals concerned.
- 3.5 Airline staff should be aware that many airports give individuals with hidden disabilities the option to identify themselves as needing assistance through wearing a suitably designed lanyard, bracelet, or similar. A ‘sunflower’ lanyard is used by the vast majority of UK airports. This has been a success for airports and we encourage airlines to ensure that their staff are trained to recognise the identifiers used by airports or to adopt their own if they feel it would be more effective.

Chapter 4

Training

- 4.1 People with hidden disabilities have widely varying needs. Further, such disabilities are often not immediately obvious. To be able to identify that a person has a hidden disability, and to be able to understand and meet their needs, a substantial emphasis should be placed on ensuring that all relevant passenger facing staff have the appropriate training. In particular, training should be provided to crew, ground staff and call centre staff such that they have a clear awareness and understanding of hidden disabilities, know how to identify people with such disabilities, and how to engage and communicate with them and their families and friends.
- 4.2 The Regulation sets out three obligations in respect of training. Under Article 11 of the Regulation airlines must:
- a) “ensure that all their personnel, including those employed by any sub-contractor, providing direct assistance to disabled persons and persons with reduced mobility have knowledge of how to meet the needs of persons having various disabilities or mobility impairments;
 - b) provide disability-equality and disability-awareness training to all their personnel working at the airport who deal directly with the travelling public;
 - c) ensure that, upon recruitment, all new employees attend disability related training and that personnel receive refresher training courses when appropriate”.
- 4.3 The Regulation also draws attention to ECAC Document 30 Section 5 annexes on training of staff. This provides more detail on recommended practice, including for training of staff to meet the needs of people with hidden disabilities. Given the varied needs of people with hidden disabilities, training modules should cover general awareness of hidden disabilities and the needs of people from the hidden disabilities spectrum. Training modules should also cover communication with people with hidden disabilities, as well as the practical assistance they are likely to need when travelling by air. Training modules on meeting the needs of people with hidden disabilities should be covered in both initial and refresher training.
- 4.4 A number of organisations run accreditation schemes for such training. We would like to encourage airlines to participate in these schemes – not only will it improve the ability of staff to recognise people with hidden disabilities and understand their needs, it will also help to reassure passengers that staff training is of an acceptable standard.

- 4.5 In addition to disability awareness training, good customer service skills are also important for communicating and helping people with hidden disabilities.

Chapter 5

Priority following disruption

- 5.1 Regulation EC261/2004 Article 11.1 states that, when denying boarding to passengers, airlines must give priority to disabled persons and persons with reduced mobility. For people with hidden disabilities being denied boarding may cause confusion, anxiety and distress. Airlines should ensure that they have systems and processes in place to identify and prioritise any disabled person, including anyone with a hidden disability, on the relevant flight.
- 5.2 In the case of flight disruption, Article 9.3 of Regulation EC261/2004 states that airlines should pay particular attention to the needs of disabled passengers, those with reduced mobility and those accompanying them when providing care and assistance. Airlines should ensure that they have systems and processes in place to identify and prioritise any disabled person, including anyone with a hidden disability on the relevant flight and airlines should ensure that they proactively provide assistance that meets the particular needs of the individual concerned. It may be preferable for such passengers to return to familiar surroundings during the disruption (their home or, if they are away from home, the hotel they have been staying in). Airlines should take this into account when providing care and assistance to people with hidden disabilities.
- 5.3 Airports continue to have responsibility for providing assistance to disabled passengers at the airport under Regulation EC1107/2006.