


# Paid-for allocated seating in aviation: an update

CAP 1709



**Published by the Civil Aviation Authority, 2018**

Civil Aviation Authority  
Aviation House  
Gatwick Airport South  
West Sussex  
RH6 0YR

You can copy and use this text but please ensure you always use the most up to date version and use it in context so as not to be misleading, and credit the CAA.

First published October 2018

Enquiries regarding the content of this publication should be addressed to: [Harriet.Gamper@caa.co.uk](mailto:Harriet.Gamper@caa.co.uk)

The latest version of this document is available in electronic format at: [www.caa.co.uk](http://www.caa.co.uk)

# Contents

---

Contents	3
Executive summary	5
Background and objectives	5
Our evidence base	5
Our assessment	6
Proposed assessment framework	9
Our recommendations and next steps	11
Chapter 2	13
Reasons for the CAA review	13
Background	13
The practice	13
Scope	14
Our objectives	15
Chapter 3	16
Legal context and guidance	16
Chapter 4	19
Our evidence base: methodology and findings	19
Introduction	19
Quantitative data: Survey of recent fliers	19
Qualitative data: Consumer experiences	22
Airline information request	24
Chapter 5	32
Our assessment	32
Introduction	32
Transparency and clarity of price	34
Provision of information to third parties	37
Impact on people with accessibility needs, including hidden disabilities	39
Impact on people travelling with children	42

---

Safety considerations	44
Use of algorithms	46
Ensuring that policies are implemented in practice	47
Chapter 6	48
Assessment framework	48
Proposed framework	48
Implementation	49
Chapter 7	50
Recommendations, next steps, and timings	50
Assessment framework	50
Clarity and transparency of pricing	51
Impacts on those with accessibility needs	51
Travelling with children and safety aspects	51
Working with others	52
Appendix A	53
Survey of recent flyers	53
Group Flights	53
Appendix B	79
CAA Consumer Engagement Survey	79
Introduction	79
Background	79
Sentiment analysis	85

# Executive summary

---

## Background and objectives

---

- 1.1 Following research and contacts from consumers, the CAA decided to review the practice of allocated seating by airlines. We wanted to find out more about how seats are allocated, if charging a separate add-on fee for reserved seating on top of the ticket price was harming the collective interests of consumers, whether the practice was being applied in a fair and consistent manner, and whether it was having detrimental effects. We considered:
- the legal context, along with established guidance and good practice;
  - how different airlines approach the practice of allocated seating; and
  - evidence of how consumers experience the extent and nature of allocated seating charges.
- 1.2 Our objectives for the review were to understand the practice and its implications for consumers in detail, to consider whether consumers (or particular groups of consumers) were being harmed by the practice, and if so to set out our next steps.

## Our evidence base

---

- 1.3 In order to fully inform our consideration of the practice, we gathered evidence from both consumers and airlines.
- 1.4 We commissioned a **survey of recent fliers**: a representative survey of 14,716 GB adults, of which over 4,000 people who had flown as part of a group in the last year. This was used to gather robust quantitative data on how frequently groups are split up, consumer awareness of the practice, and how much people spend to sit together.
- 1.5 We found that the majority of people (87%) were aware airlines might not automatically allocate seats together (where possible). Around half of respondents (47%) thought that airlines would do their best to sit people in a group together in any case. However, our research found that, in reality, the chances of sitting together without paying for specific seats could vary depending on which airline was used. Consumers flying with some airlines were more likely to report being separated from their group than others. We published the results of this research in February 2018.
- 1.6 We also opened a short, voluntary **consumer engagement survey** using our consultation hub, where those who chose to could share their concerns,

experiences and views. We received over 1,000 responses, and used what consumers told us to gather evidence of people's experiences and how they view the practice of paid-for seat allocation. This sample was self-selecting and we expect the balance of feedback to be negative, as those who were dissatisfied may have been more likely to tell us about their experience. However, it still provided valuable insights into how people view the practice of paid-for seat allocation. A key finding was that many consumers believed that airlines were purposefully separating people in order to make money, a sentiment which tended to make people feel dissatisfied with airlines and which could cause consumers to disengage from the market. Consumers also took the opportunity to raise other issues, such as problems for those travelling with children, problems for people with accessibility needs, as well as potential safety issues.

- 1.7 In February 2018 we sent an **airline information request** to the top 10 UK and non-UK airlines based on passenger numbers: British Airways, easyJet, Emirates, Flybe, Jet2, Ryanair, TUI, Thomas Cook, Virgin and Wizz Air. All 10 airlines responded, giving details on how they sell and allocate seats.
- 1.8 Seats are usually allocated using automated processes such as algorithms, and some airlines have set up active attributes to help make sure groups are placed together even if they do not pay for specific seats. Other airlines may do this for groups containing passengers with specific characteristics (for example children). Other systems allocate seats in a less consistent manner. We found that all the airlines we asked allow passengers to check-in and be given a seat free of charge, even if passengers are not allowed to choose a specific seat. However, it was notable that these seats may not be next to those of other members of the group. We asked all of these airlines if passengers booking with them need to pay an extra charge to select a specific seat to guarantee sitting with the rest of their group. Charges to select specific seats varied widely from £1.99 up to £100 on some long-haul business flights. Prices are per seat per journey leg. There can be different tariffs within each flight as well as between flights and between airlines.

## Our assessment

---

### Introduction

- 1.9 We recognise that price partitioning – whereby elements such as baggage, food on board or priority boarding can be charged as separate add-ons to the basic ticket for the flight – may have benefits for some consumers, particularly those who are not concerned about sitting together and prefer to pay less for their ticket. Having reviewed the evidence, however, we are concerned that the practice creates increased or unnecessary costs in some areas and for some

consumers – particularly those who want or need to sit with their family, carer or companion when travelling.

## Engagement in the market

- 1.10 We considered the broader context and whether consumer trust (and therefore engagement) in the market could be undermined by allocated seating practices. Evidence from our Aviation Consumer Survey<sup>1</sup> and our consumer engagement survey showed that satisfaction with the travel experience, though still high, is falling – and that people do not always find it easy to search and compare online. Allocated seating practices tended to make respondents to both of our surveys feel more dissatisfied with airlines. If decreased trust in the market were to mean consumers engage less, this could reduce the likelihood of shopping around, which could in turn weaken competition between airlines, meaning consumers would be less likely to get the best deals for their needs.

## Clarity and transparency of pricing

- 1.11 We then turned to the clarity and transparency of pricing. We considered two possibilities:
- that consumers could over-estimate the likelihood of being split up and so pay the add-on fee even if the chances of being split up are low.
  - or, that consumers may be correct to believe they are likely to be split up, but (for those who are concerned about being split up) are unable to see the final ticket price, including the add-on fee, at the start of the booking process.
- 1.12 Our research found that the chances of being sat with your group (if you did not pay extra to do so) varied widely between airlines, and the information on likelihood of sitting together without paying does not appear to be disclosed by airlines at the points where allocated seats are sold. This raises a question around uncertainty: consumers cannot be sure if they really need to buy the add-on or not in order to sit together.
- 1.13 Our estimates show that across the industry almost half (45%) of total paid-for seat allocations may not be necessary based on the end result of sitting together: these people would have been seated together anyway, without paying extra. This equates to between 6.8 and 10.4 million passengers spending around £74 million to £175 million extra each year. Whilst some consumers may gain some benefit from the certainty of knowing they will be able to sit together once they have paid, this may impact certain groups (such as those people that need

---

<sup>1</sup> See: [http://publicapps.caa.co.uk/docs/33/CAA%20Aviation%20Consumer%20survey%20--%205th%20wave%20report%20FINAL%20\(2\).pdf](http://publicapps.caa.co.uk/docs/33/CAA%20Aviation%20Consumer%20survey%20--%205th%20wave%20report%20FINAL%20(2).pdf).

to sit with a companion so they can be provided with essential support and assistance or those travelling with young children) more than others.

- 1.14 In addition, consumers should be made aware where, for example, airlines have systems in place to try to place consumers together even where they have not paid extra, and consumers should be clearly made aware of the chances of being split up before paying extra for allocated seats. Just over a third (34%) of respondents to the survey of recent fliers paid extra to ensure they could sit together, and most of these (61%) said they did so as “they did not want to risk not sitting together if they didn’t pay”. This group are sure they want to sit together and are willing to pay extra to ensure it, but currently it may not be possible to specify this preference at the start of a search.
- 1.15 Widely varying charges, both between airlines and within flights, can also make it difficult for consumers to calculate the cost of sitting together, and thus harder to compare the total cost of flying with different airlines when making a purchasing decision. This problem is compounded by the fact that allocated seating has to be selected relatively late in the booking process. It is therefore unclear what the final price will be up front, and consequently more difficult to compare prices across airlines. We had similar concerns that digital comparison tools and online intermediaries may need access to better information to ensure they also have the ability to provide accurate and up-to-date information to consumers.

### **Impact on group members with particular characteristics**

- 1.16 People may want to sit together for a wide variety of reasons, one of which may be that they are travelling with a companion who they are assisting or who needs to provide assistance for them. In such cases, sitting together may not be an optional extra: It may be very difficult or impossible for some people to fly without a companion close by. Accessibility needs may be visible, but they may also be hidden.
- 1.17 We have raised concerns that people that need to sit with a companion so they can be provided with essential support and assistance might be paying more than they need to, as airlines may have put in place processes to seat these groups together with no extra charge. However, this may not be made clear in advertising and booking flows, meaning people think they need to pay to guarantee sitting together. Where people need to sit with a companion so they can be provided with essential support and assistance, our view is that airlines should not charge for adjacent seating. We have similar concerns about other groups, such as people travelling with young children. These are areas that we take particularly seriously and that we will prioritise in our next steps.



## Safety considerations

- 1.18 A small but important percentage of respondents to our consumer engagement survey raised safety issues, including whether emergency evacuation could be impeded if people were separated from friends and family. This was particularly important to those travelling with children but may also affect many other groups – including people with accessibility needs (who may need assistance to exit the plane or to deploy oxygen masks for example), or those travelling with other relatives.

## Other considerations

- 1.19 We have also considered other issues in the context of the review, such as the use of automated processes for booking flows and/or to assign seats. At this stage, we have not examined how these processes are set up and the outcomes they are intended to produce. We are aware of emerging risks, as well as opportunities, in this area and will continue to keep it under review.

## Proposed assessment framework

---

- 1.20 In order to address the issues around compliance with the law, adherence to guidance, and to promote good practice, the CAA plans to introduce an assessment framework. This will enable airlines to self-assess, as well as allowing the CAA to evaluate and publish performance in an objective manner. It will promote good practice and will provide information that can be used by consumers, either directly, or indirectly via informed third parties such as consumer organisations and representative groups.
- 1.21 Suggested criteria for assessment include:
- whether the headline price includes a guarantee of sitting together or not;
  - whether the chances of sitting together if the consumer doesn't specifically purchase this option are made clear at relevant stages;
  - the number of steps that need to be taken when booking to obtain a final price that includes sitting together;
  - the provision of information to third parties such as comparison tools;
  - if, at an early stage of the booking process, there are proactive options or prompts to add information about travelling with particular categories of passenger such as children, older passengers or people with accessibility needs;
  - whether fees are requested to guarantee sitting next to the categories of passenger above; and

- whether airlines have adequate processes in place to ensure that commitments made are fulfilled in practice.

- 1.22 Some of these criteria relate to unambiguous requirements, such as ensuring those people that need to sit with a companion so they can be provided with essential support and assistance can sit with a companion without having to pay extra, or ensuring that adults travelling with children under the age of 12 are able to sit close together. Other areas, such as how booking processes are designed, may relate more to good practice, which can be established and shared in order to drive improvements across industry.
- 1.23 We will next engage with relevant stakeholders to refine the framework, including meeting with airlines to understand their views in more detail and to explore good practices. We will then assess airlines against the framework and publish the results in a transparent and accessible manner. We welcome stakeholder views on the proposed framework.

## Our recommendations and next steps

---

- 1.24 Alongside development of the assessment framework, we have already published information on our own website about the chances of being separated if not paying extra to guarantee seats by airline. Throughout the remainder of 2018 and during the first half of 2019, we will work with airlines to explore ways to improve direct booking channels. This will include how paid options such as seating allocation are presented, and at what stage of the booking process. Websites may need to be changed so that the appropriate information is obtained from the consumer at the start of the process before the price is returned. It may be helpful to include an option where sitting together is priced in to the final ticket cost automatically, with an opt-out for those who are not concerned. We will focus particularly on any disproportionate impacts on particular groups of consumers.
- 1.25 At the same time we will further engage with airlines, digital comparison tools (DCTs) and online intermediaries to explore how better information might be made available to such third parties in a timely manner to ensure they have the ability to provide accurate and up-to-date information to consumers. We will also engage with the European Commission to explore whether there are restrictions on the ability of DCTs to access flight data and how these might be addressed, recognising the international dimension in the aviation market. We will discuss developments in the functionality of DCTs with partners including the Competition and Markets Authority (CMA).
- 1.26 We will prioritise areas which we feel may impact unfairly on people with accessibility needs. We will address these issues with airlines, alongside sharing and monitoring performance against good practices. And we will continue to keep compliance with both the Consumer Protection from Unfair Trading Regulations 2008 (CPRs) and Regulation EC 1107/2006 under review through our ongoing work in this area, including via our regular meetings with airlines, our work on compliance, and our work with airlines on improving how the needs of those with hidden disabilities are taken into account. If we find evidence of non-compliance we may take enforcement action.
- 1.27 Those travelling with children are another group whose needs are important. In order to comply with the relevant guidance, including the European Aviation Safety Agency (EASA) Acceptable Means of Compliance and Guidance Material, airlines should take proactive steps to seat those travelling with children (in particular children under 12) together. Consumers should be informed clearly, and before being offered the opportunity to pay for specific seats, that this is the case. Airlines should have robust procedures in place to ensure they are compliant with the relevant guidance in practice.

- 1.28 In terms of safety, the CAA's Flight Operations Department will also continue to keep this area under review. The CAA will carry out focused oversight against applicable requirements in this area, identify instances of non-compliance with regulations and observe where practices may be improved. The CAA will also highlight this report to the European Aviation Safety Agency (EASA) for further consideration.
- 1.29 We will also engage with airlines via the Flight Operations Liaison Group to understand the processes airlines have in place to comply with safety regulations and good practice in this area.
- 1.30 Finally, we will also keep other relevant areas under review, including by working with appropriate stakeholders. We are, for example, in the process of applying to the Regulatory Pioneers Fund for funding to develop a project to explore whether and how regulators could gain greater oversight capabilities in relation to the use of automated systems, the outcomes of which would be shared with other regulators and government. In addition, we will discuss work on automation with the CMA to explore possible learning from other sectors.

## Chapter 2

## Reasons for the CAA review

---

### Background

---

- 2.1 The Civil Aviation Authority (CAA) previously commissioned research on unfair terms and conditions in aviation<sup>2</sup>, exploring the extent to which consumers feel that they have been treated in a way that is fair and reasonable in relation to airlines' terms and conditions. A key finding was that respondents felt having to pay to choose a seat in advance of the day of the flight was one of the top three most unfair aspects. This was unexpected, as it arose organically through the research – it was not a question which was specifically asked or highlighted to participants.
- 2.2 In addition to this, the CAA was being contacted by concerned consumers highlighting that they thought that having to pay to choose a seat is unfair – particularly when people are travelling with children – and asking for our advice.<sup>3</sup>
- 2.3 We therefore decided to undertake a review of current practice. We wanted to find out more about how seats are allocated, if charging a separate add-on fee for reserved seating on top of the ticket price was harming the collective interests of consumers, whether the practice was being applied in a fair and consistent manner, and whether it was having detrimental effects. We considered:
- the legal context, along with established guidance and good practice;
  - how different airlines approach the practice of allocated seating; and
  - evidence of how consumers experience the extent and nature of allocated seating charges.

### The practice

---

- 2.4 When booking tickets online, some airlines charge extra for an allocated seat, meaning that consumers have to pay more to have a guarantee of sitting with their companion or group. If consumers choose not to buy specific seats they may still be able to sit together but it is not guaranteed.

---

<sup>2</sup> Research forthcoming in 2018.

<sup>3</sup> In 2017-18 we were contacted over 100 times via our general enquiries form about seating. We recorded 53 tweets on the practice (although we only set our systems to record this from February 2018). Our CEO also received correspondence about the practice.

- 2.5 People may want to sit together for a wide variety of reasons, including because: they used to be seated together on previous flights without having to take extra actions to guarantee it; they expect to having booked together; they are travelling with children; they are travelling with a companion or someone to help them; or for many other reasons. It is important to note that a significant proportion of travellers<sup>4</sup> may be at risk of vulnerability due to factors such as anxiety, old age, or mental or physical health issues. For this large and diverse group, sitting together may not be an optional extra. It may be very difficult or impossible for them to fly without a companion next to them.
- 2.6 Seating is currently one of a number of elements that may be charged as a separate add-on to the basic ticket for the flight. Others include baggage, food on board, or priority boarding. We recognise that this type of price partitioning can have benefits – not everybody wants to check-in hold luggage or eat on board for example, and those who do not need such options do not need to pay for them where they are charged separately. However, the practice creates challenges in a number of areas, and these are explored below in Section 5.

## Scope

---

- 2.7 The scope of our review encompassed the process for reserving seats for groups travelling together. We excluded other types of seat-buying, such as seats with extra legroom or priority boarding, which can also include the opportunity to select specific seats.
- 2.8 We defined a group as two or more people travelling together, who booked their tickets as part of the same transaction.
- 2.9 We defined being seated together as sitting next to each other in the same row, or immediately across an aisle. For larger groups (such as three or more people, where the group would take up more than one row of seats) we defined groups as being seated together if they are seated next to some members of the group and no more than one seat row or aisle away from other members of the group.

---

<sup>4</sup> The most recent CAA Consumer Aviation Survey (wave 5) found one in five UK consumers has a disability or health condition that limits their day to day activity. 57% say they find accessing or using airports difficult, and/or find flying difficult in general. See: [http://publicapps.caa.co.uk/docs/33/CAA%20Aviation%20Consumer%20survey%20--%205th%20wave%20report%20FINAL%20\(2\).pdf](http://publicapps.caa.co.uk/docs/33/CAA%20Aviation%20Consumer%20survey%20--%205th%20wave%20report%20FINAL%20(2).pdf). Our survey of recent fliers found that 14% of people who booked tickets for a group either had a disability, health or medical condition that would have an impact on travelling themselves or were travelling with somebody who did. The same applied to 12% of respondents to our consumer engagement survey.

## **Our objectives**

---

- 2.10 Our objectives for the review were to understand the practice and its implications for consumers in detail, to consider whether consumers (or particular groups of consumers) were being harmed by the practice, and if so to set out our next steps.

## Chapter 3

## Legal context and guidance

---

- 3.1 Certain obligations relate to how tickets are sold and the information provided to consumers when they are making purchasing decisions, and under general principles, it may be permissible for allocated seats to be charged for by airlines as long as it is done in a clear and transparent manner. Relevant legislation includes:
- Consumer Protection from Unfair Trading Regulations 2008 (CPRs)<sup>5</sup>: The CPRs prohibit unfair commercial practices, including misleading actions, misleading omissions and aggressive practices. The CPRs are general consumer protection measures and are not specific to aviation.<sup>6</sup> They are enforced via the Enterprise Act 2002, as well as via criminal prosecution by the Competition and Markets Authority, Trading Standards Services and the Northern Ireland Department for the Economy. There are also some specific private rights of action for individual consumers.
  - Air Services Regulation (ASR)<sup>7</sup>: The ASR sets out a broad range of requirements including the obligations relating to the financial licensing of airlines and insurance requirements. Article 23(1) of the ASR sets out a number of legal obligations relating to the way prices for flights are displayed.
  - Civil Aviation Act 2012<sup>8</sup>: This places duties on the CAA to provide, where appropriate, information to users of civil air transport services about services and facilities available in the market.
- 3.2 Other regulations and guidance cover seating on planes for specific categories of traveller. For example:

---

<sup>5</sup> Consumer Protection from Unfair Trading Regulations 2008 available at: <http://www.legislation.gov.uk/ukxi/2008/1277/contents/made>

<sup>6</sup> For more information see the guidance on the UK Regulations (May 2008) implementing the Unfair Commercial Practices Directive published by the Office of Fair Trading and the Department for Business, Enterprise and Regulatory Reform in 2008: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/284442/oft1008.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/284442/oft1008.pdf).

<sup>7</sup> REGULATION (EC) No 1008/2008 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 September 2008 on common rules for the operation of air services in the Community.

<sup>8</sup> Civil Aviation Act 2012 available at: <http://www.legislation.gov.uk/ukpga/2012/19/contents/enacted>



- Certain European Aviation Safety Agency (EASA) Acceptable Means of Compliance and Guidance Material refers to the carriage of “special categories of passengers”, which sets out that when establishing the procedures for the carriage of special categories of passengers (SCPs), including the seating of children, the operator should take into account the following factors:
  - a) the aircraft type and cabin configuration;
  - b) the total number of passengers carried on board;
  - c) the number and categories of SCPs, which should not exceed the number of passengers capable of assisting them in case of an emergency evacuation; and
  - d) any other factor(s) or circumstances possibly impacting on the application of emergency procedures by the operating crew members.<sup>9</sup>
- Regulation EC 1107/2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air<sup>10</sup>, which gives additional protection to this group, requiring airlines to make all reasonable efforts to give people accompanying a passenger with disabilities or reduced mobility seats next to that passenger.
- The Civil Aviation (Access to Air Travel for Disabled Persons and Persons with Reduced Mobility) Regulations 2014,<sup>11</sup> which make further provision for implementing Regulation (EC) No 1107/2006 through a civil enforcement regime.

3.3 In addition, the CAA has previously provided information on seating of certain types of passenger, particularly children. The CAA recommends the following:

*“The seating of children close by their parents or guardians should be the aim of airline seat allocation procedures for family groups and large parties of children.*

*Young children and infants who are accompanied by adults should ideally be seated in the same seat row as the adult. Where this is not possible, children should be separated by no more than one seat row from accompanying adults.*

---

<sup>9</sup> See GM2 CAT.OP.MPA.155(c) in the AMC to Part-CAT, which sets out guidance on carriage of special categories of passengers, including the seating of children.

<sup>10</sup> Regulation EC 1107/2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air, available at <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex%3A32006R1107>.

<sup>11</sup> The Civil Aviation (Access to Air Travel for Disabled Persons and Persons with Reduced Mobility) Regulations 2014, available at: [http://www.legislation.gov.uk/uksi/2014/2833/pdfs/ukxi\\_20142833\\_en.pdf](http://www.legislation.gov.uk/uksi/2014/2833/pdfs/ukxi_20142833_en.pdf).

*This is because the speed of an emergency evacuation may be affected by adults trying to reach their children.*

*Whenever a number of infants and children are travelling together the airline should make every effort to ensure that they can be readily supervised by the responsible accompanying adults.”<sup>12</sup>*

- 3.4 Having looked at the initial evidence from consumers and considered the underpinning rules and recommended practices, we decided to undertake a detailed review. We therefore gathered evidence from both consumers and airlines to inform our considerations.

---

<sup>12</sup> See: <http://www.caa.co.uk/passengers/on-board/seating-allocation/>.

## Chapter 4

# Our evidence base: methodology and findings

---

## Introduction

---

- 4.1 In order to fully inform our consideration of the practice, the CAA gathered evidence from both consumers and airlines. We carried out the following:
- **Survey of recent fliers:** A representative survey of 14,716 GB adults, of which over 4,000 people who had flown as part of a group in the last year. This was used to gather robust quantitative data on how frequently groups are split up, consumer awareness of the practice, and how much people spend to sit together.
  - **Consumer engagement survey:** A short, voluntary consumer engagement survey using our consultation hub, where those who chose to could share their concerns, experiences and views.
  - **Airline information request:** An information request sent to the top 10 UK and non-UK airlines (based on passenger numbers) asking for more information on their seating policies and practices.

## Quantitative data: Survey of recent fliers

---

- 4.2 Our survey of recent fliers was designed to find out how widespread the practice was, if consumers had concerns about it, and what impact the practice had on people. Because the survey formed a representative sample of GB adults, the results provide robust quantitative data about people who have flown as part of a group where they were the ticket holder in the last 12 months.
- 4.3 We appointed You Gov to carry out the quantitative survey. Fieldwork was undertaken between 28th December 2017 and 9th January 2018. The total sample size was 14,716 adults, of which 4,296 had flown as part of a group where they were the ticket holder in the last year. The survey was carried out online. The figures were weighted and are representative of all GB adults (aged 18 or older).
- 4.4 We asked about the following aspects of respondents' experiences:
- how many people were in the group, their ages, and whether anyone in the group had a disability, health or medical condition that impacted on travelling;
  - which airline they flew with;
  - whether they were aware the airline might not automatically allocate seats together, so people in the group might have to sit separately on the flight;

- whether they sat together or not;
- whether they paid extra to guarantee sitting together, and if so how much;
- at what stage they were made aware by the airline that they would need to pay to ensure the group could sit together; and
- how this made them feel about the airline.

4.5 The results are summarised below and can be found in full at Appendix A.

### Differences between airlines in seating people together

4.6 We found that the majority of people (87%) were aware airlines might not automatically allocate seats together. Around half of respondents (47%) thought that airlines would do their best to sit people in a group together in any case. However, our research found that, in reality, the chances of sitting together without paying for specific seats could vary depending on which airline was used. Consumers flying with some airlines were more likely to report being separated from their group than others. The table below shows the chances of being separated if not paying extra to guarantee seats by airline.

**Table 1: Chances of being separated if not paying extra to guarantee seats by airline – based on the CAA research**

Airline	Total respondents who flew with this airline	People who didn't pay more to sit together and WERE separated from their group
British Airways	456	15%
easyJet	930	15%
Emirates	100	22%
Flybe	144	12%
Jet2	343	16%
Ryanair	617	35%
Thomas Cook	275	15%
TUI Airways (previously Thomson Airways)	383	12%
Virgin Atlantic	131	18%

Weighted base: All GB adults who have flown as part of a group where they were the ticket holder in the last year.

Note: This table includes the top airlines operating in the UK by terminal passengers excluding those where there were fewer than 50 respondents surveyed.

## Clarity over paying to ensure sitting together

- 4.7 Respondents were not clear about whether they needed to pay more to sit with their group or not. Although the majority of respondents were aware that they might not be able to sit together even if they booked as a group, almost half (47%) believed that their airline would automatically allocate them seats together:
- just over half (52%) of respondents reported that their airline informed them before they booked their flight that they would need to pay to ensure their group could sit together;
  - 10% of respondents said that they had been informed after they booked, and a further 10% said that they were never made aware by their airline that they may need to pay more to guarantee sitting together;
  - however, two in five respondents thought that their airline would **not** automatically sit them together.

## Charges

- 4.8 In terms of add-on fees to sit together, around half (52%) of all passengers who sat together did not have to pay an additional charge to do so. However, 8% of respondents that ended up sitting together said that they had to change seats either at check-in or on board to avoid being sat apart.
- 4.9 We calculated that UK consumers collectively may be paying between £160-390m per year for allocated seating.<sup>13</sup> Of those paying, two-thirds spent between £5 and £30 per seat and a further 8% paid £30 or more.

## Consumer sentiments

- 4.10 Of the group of respondents that paid extra to sit together, six in ten reported that they did so because of the risk that their airline might split their group or family up, leading us to conclude that this issue is of importance to a wide group of consumers. Almost half of respondents (46%) felt negatively towards the airline when they realised they would have to pay more to guarantee sitting together, a finding which is further reflected in the results of the CAA's consumer engagement survey. The results of this are below.

---

<sup>13</sup> The calculation used the results of the survey of recent fliers, and includes the top 10 airlines operating in the UK by passenger number. We then estimated the proportion of UK passengers that travel in groups, using data from the CAA's Departing Passenger Survey (see <https://www.caa.co.uk/Data-and-analysis/UK-aviation-market/Consumer-research/Departing-passenger-survey/Departing-passenger-survey/>). These figures were used in conjunction with the results of the recent flier survey to estimate the percentage of passengers that pay to sit together at each of the top 10 airlines.

## Qualitative data: Consumer experiences

---

- 4.11 We opened a consumer engagement survey which ran from 2 February to 2 March 2018. This revealed how consumers feel about the practice of charging to guarantee groups can sit together. Consumers were able to tell us about the background to their group travel, which airline they travelled with, how much they paid to sit together (if applicable), and their views on being charged to sit together. We promoted the survey via our website and highlighted it in the media. We also directed people who contacted the CAA about seating to the survey so they could give their views. We received a total of 1,069 responses. Most respondents had flown six months ago or less, with almost one third having flown in the last month. We are grateful to all the people who took the time to respond.
- 4.12 We asked about the following aspects:
- how many people were in the group, their ages, and whether anyone in the group had a disability, health or medical condition that impacted on travelling;
  - which airline they flew with;
  - if they paid extra to guarantee sitting together, then how much;
  - why they didn't sit together if this was the case; and
  - their experiences of seating arrangements, including if they had reported any concerns to the airlines, and if so what their response was.
- 4.13 This sample was self-selecting and unlike the survey of recent fliers is therefore not representative of GB adults. We expect the balance of feedback to be negative, as those who were dissatisfied may have been more likely to tell us about their experience. However, it still provided valuable insights into how people view the practice of paid-for seat allocation.
- 4.14 The final question asked people to tell us about their experience of seating arrangements, whether they reported any concerns to the airline, and if so, how these were handled. We asked people to limit their response to 500 words.
- 4.15 To analyse this question we used a basic qualitative research method which involved identifying, and then applying, a list of themes. Staff read all 1,069 responses between them from scratch and noted the themes that arose in each and every answer. This method ensured that the themes we discuss from the consumer engagement survey were generated by the respondents in their free text responses – and were not pre-identified by the CAA but are the key points raised directly the respondents themselves. It also meant that key themes emerging in each response were noted so that, where possible, they were analysed quantitatively. This allowed us to identify how many respondents, and of which stakeholder group, raised a particular topic or concern.

4.16 The results are summarised below and can be found in full at Appendix B.

### Group characteristics

4.17 Respondents to the survey were likely to be recent fliers. Most had flown within the last six months (66%) and almost a third of respondents had flown in the last month (29%). Over half of those who responded (51%) travelled as part of a couple. Almost a further third of respondents were travelling with children. Most respondents did not report having a disability, health or medical condition that would impact on travelling themselves, and were not travelling with somebody who did. However, 11% (124 respondents) told us they either had such a condition themselves or were travelling with somebody who did. Over half of respondents had travelled with Ryanair (52%). 11% of respondents travelled with TUI, 7% with British Airways, 7% with easyJet and 6% with Jet2.

### Sitting together

4.18 Approximately a third (31%) said they did sit together. This was either because they paid to sit together, because the airline seated them together without extra charges, or because they moved at check-in or on the plane. More than a third (35%) said they wanted to sit together but it was too expensive to pay extra to do so. Just over one in 10 (11%) told us they didn't sit together as they were not sufficiently concerned about it to pay extra to do so.

4.19 In line with our findings above from the survey of recent fliers, consumers told us they sometimes paid substantial amounts of money to ensure they could sit together. Of those who noted how much they paid (468 people, excluding those who didn't know or couldn't recall), the biggest proportion told us it cost £5 - £9.99 per seat for specific seats together (29%). 25% paid £10 - £14.99, while 17% paid £30 or more.

### Sentiment analysis

4.20 Our sentiment analysis focused on the most popular themes identified. The most commonly raised sentiment was the belief that the airline was purposefully separating people in order to make money. 41% of respondents used the opportunity to tell us they believed this to be the case. Often they gave us examples of where they and their other group members had been seated by the airline, suggesting they were very far apart, or that they could see other groups that had been seated separately too.

4.21 The second most common theme was that the respondent specified that they were dissatisfied with the airline. This sentiment, expressed by one third (36%) of respondents, is closely associated with the belief that the airline is purposefully separating people. Respondents suggested this was "bad behaviour" on the part of the airlines.

- 4.22 The third most common statement from respondents was that despite being split up, they could see seating available when they booked, checked in, or on board the flight. People often suggested this was evidence that the airline was deliberately separating groups. 29% of respondents said they could see seating availability that would have enabled their group to be sat together.
- 4.23 The other things people most often chose to tell us were:
- that they paid to ensure they sat with their group (23%);
  - that they felt they had no option but to pay (21%); and
  - that it was reasonable for them to expect to be seated with the other passengers they booked with (19%).
- 4.24 One of the less common statements people shared with us, but that is concerning from a regulatory perspective, is that they, or someone in their group, had a disability and yet they were allocated seats apart. 7% of respondents told us about these sorts of experiences. Some respondents told us that they had a physical disability and had booked assistance, and that they expected this to mean they would be seated together as one person was assisting or caring for another. Other respondents told us of passengers with hidden disabilities, for example autistic children, and the problems that arose when they were separated.
- 4.25 27% of respondents to our consumer engagement survey told us they were travelling with children. Around half of these said that the seats they were allocated separated one or more child from the parent(s). 8% of those separated were travelling with children of 2 years old or younger, 64% were travelling with children aged 2-12 years old, and 28% were travelling with children aged 13-16 years old. We are concerned by these figures, particularly in view of current guidance on the seating of children.<sup>14</sup>
- 4.26 Finally, a small but important percentage of respondents raised safety issues, including whether emergency evacuation could be impeded if people are separated from friends and family. Again, this is something which we take seriously and that we have considered in the context of the review.

## Airline information request

---

- 4.27 We asked airlines for information on their policies and practices around seating to inform our consideration of the issues. In February 2018 we sent an information request to the top 10 UK and non-UK airlines based on passenger

---

<sup>14</sup> See CAT.OP.MPA.165.



numbers<sup>15</sup>: British Airways, easyJet, Emirates, Flybe, Jet2, Ryanair, TUI, Thomas Cook, Virgin and Wizz Air.

- 4.28 We asked for more information on their seating policies and practices and for quarterly data on group sizes and the number of groups that paid for seating assignments over the past 18 months. Our particular focus was on:
- whether or not passengers can pay to choose a seat;
  - when and how in the booking process passengers are made aware that they can pay to guarantee sitting together;
  - how much is charged, whether this varies, and if so what the variables are;
  - how seats are allocated when people travelling in a group have not paid to guarantee sitting together;
  - whether the make-up of a group is known (for example groups containing children or people who need extra help and assistance);
  - information on airline policies relating to seating specific groups of travellers (such as travellers with children or groups that include people who need extra help and assistance);
  - how airlines ensure their policies are implemented in practice; and
  - information on complaints and how these are resolved.
- 4.29 All the airlines we asked provided details of their policies and practices, and we are grateful to them for their helpful engagement.

### Choosing a seat

- 4.30 All the airlines we asked told us they allow passengers to check-in and be allocated a seat free of charge. However, it was notable that these seats may not be next to those of other members of the group. One airline told us that customers can pay to choose their seat on any route. Two airlines told us seats can be selected for free on most routes, but with some restrictions around fare type: passengers on particular fares cannot choose a seat on one airline, while only those who have bought a specific type of ticket or bundle can choose seats on another. Three airlines of the 10 airlines we spoke to mentioned loyalty schemes which allow passengers to select seats before check-in opens for other passengers.

---

<sup>15</sup> We used CAA 2016 annual terminal passenger numbers as this was the most complete annual data set at the time the review began: see <https://www.caa.co.uk/Data-and-analysis/UK-aviation-market/Airports/Datasets/UK-airport-data/>

- 4.31 Seats are usually allocated using automated processes such as algorithms. There may be restrictions on when people can select their seat. For example, some airlines allow check-in with free seat allocation to happen only 24 hours before departure.
- 4.32 In practice, because some passengers can check-in before others, and because some people will buy specific seats, there will be a knock-on effect on the remaining passengers in terms of the remaining seats available and their location in relation to one another.

### Option to pay for seats

- 4.33 If passengers wish to select a specific seat to guarantee sitting with the rest of their group, then they will need to pay an extra charge. This is the case across all airlines we asked.
- 4.34 Passengers are notified during the booking process that they can pay extra to ensure specific seats. This is generally on the second page or stage of the booking flow, after flight times and dates, number of passengers, and baggage have been selected. Once passengers have checked in and been allocated seats, they will again have the option to purchase specific seats. Some airlines also allow passengers to buy a specific seat right up to departure at the airport.
- 4.35 Airlines report that they want to make sure their customers have plenty of opportunities to purchase seats if they wish to, and are aware of the options to do so. One airline told us that ancillary products are offered to customers in order of customer demand. Hold luggage is the highest demanded ancillary product and this is shown first, followed by seat allocation.

### Costs and charges

- 4.36 We found that charges to select specific seats varies widely from £1.99 up to £100 on some long-haul business flights. Prices are per seat, per journey leg. There can be different tariffs within each flight as well as between flights and between airlines.
- 4.37 Airlines told us they use different combinations of the variables below:
- six airlines of the 10 we spoke to said the fee was dependent on the location of the seat in the cabin;
  - three said the fee was dependent on route;
  - two airlines referred to flight length;
  - two airlines said that seat prices depend on demand;
  - one mentioned the class of cabin; and

- one said the fee was dependent on departure date (one fee for peak periods, another for low season).

4.38 Front row and extra leg room seats were other attributes which could affect the seat price. However, as part of our information request we had asked airlines to exclude these attributes.

### How seats are allocated

4.39 We asked airlines to provide information on how seats are allocated, including when people do not pay for specific seats, and to give details of any processes for allocating seats to groups, families or companions together when possible.

4.40 Four of the 10 airlines we spoke to told us they try to seat groups together wherever possible, and mentioned active attributes to help make sure groups are placed together:

- One of these airlines said that even if passengers do not pay to sit together their algorithm is designed to ensure that passengers on the same booking reference will be sat together wherever possible when they check-in (which they can do from 30 days before departure). The best way for customers on the same booking to remain seated together (without paying for seats) is to check-in as early as possible – this is the advice given to passengers on the airline’s help pages.
- The second airline noted most of its customers travel in family groups or as couples. 29 days before departure, it runs a process which aims to permit customers identified as either couples or family groups (which it defines as a group with at least one customer aged 15 or under) to sit together without additional charge. Customers will be allocated seats together where possible without charge, subject to availability, even where they have not chosen to purchase allocated seating in advance.
- The third airline reported that its system automatically allocates seats to passengers 96 hours before departure for all bookings that include: unaccompanied minors travelling alone; passengers with infants; and any booking with four or more passengers booked under a single booking reference irrespective of whether or not that reference contains any infant or child. Before departure at 72 hours and 6 hours, additional checks are conducted manually to ensure any remaining passengers without seat allocation are provided with suitable seats. Special priority is given to groups of passengers of two or more with the objective to seat them together wherever possible, although this is subject to availability.
- The fourth airline told us that if a group book online or via the ‘booking kiosk’ the system is set up to ensure all customers in the same booking will be sat together wherever possible.

- 4.41 One airline told us it does not purposely try to split groups up. It said its automated system allocates seats depending on what seats are left that have not been pre-allocated prior to check-in. The system will try and seat groups together where there is capacity on the aircraft. However, it is sometimes not possible to sit groups together due to the volume of pre-selected seat bookings. It told us the system does not intentionally seek to separate groups.
- 4.42 Four airlines of the 10 we spoke to told us they aim to seat groups together, and provided examples of how this is done for specific types of group (such as those travelling with children):
- One airline said they do this for passengers travelling with children and those in groups of more than nine. A 'robotic' tries to allocate seats together, and if it cannot it is flagged for manual attention. Other passengers are ranked according to business rules on a flight – and taking into account additional parameters such as whether the booking is confirmed and whether space is available, whether the passenger is a member of a frequent flier scheme, passengers such as wheelchair users or those with specific medical needs, and the number of passengers in the booking.
  - The second airline reported that check-in is available 48 hours prior to scheduled departure. Those passengers who have already made their seat booking have the opportunity to select any preferred seat, and when the check-in starts for the other passengers, the system will start to automatically allocate seats based on availability. During the check-in process passengers still have the opportunity to select a seat for a fee depending on the availability of seats. The system considers families with children to make sure that they are seated together. The system algorithm is set up in a way to allocate children together with a parent/adult in the same booking, if empty seats next to each other are available at that time. If the aircraft is completely full, except for seats that are not next to each other, the airline blocks the check-in for the family's booking, requesting them to go to the check-in desk where the handling agent at the airport can make sure they are seated together, whenever possible.

- The third airline reports allocating any un-picked seats using an algorithm. The algorithm first picks up any customers who have paid to select a seat but haven't yet chosen a seat. It will seat them together where possible. If it's not possible to do this, it will queue them. The queue is then manually managed daily. The seating team will aim to sit the customers together, utilising seats the airline has previously blocked out if necessary. Once all customers who have paid-for seating products have been allocated a seat, the tool will then run again for families without seat upgrades (bookings with children aged 11 or under). It will aim to seat families together. If it's not possible to sit the whole family together, it will aim to sit every child with at least one adult. If this is not possible, it will queue the booking which will be picked up manually by the seating team who will aim to sit them together using the blocked seats. The airline explained these blocked seats were introduced for family seating: To enable it to solve issues before departure, it holds back a number of seats to ensure it can manage family seating issues.
- The fourth airline explained that it prioritises 'PRM' customers and their group as well as customers travelling with children under 12. It tries to seat families with children under 12 years old together, free of charge. If it can't seat all the family together, it makes sure each child under 12 years old is seated with an adult from the group. The airline highlighted that if customers want to make sure all the family are sitting together in their preferred choice of seats, there is the option to purchase seats online in advance.

4.43 One airline said it assigns seats randomly if passengers do not pay to select specific seats. Arguably, the chances of being sat together when allocation is random are very low.<sup>16</sup>

4.44 Of the 10 we spoke to, two airlines mentioned the additional information that it is an important safety aspect to balance the aircraft adequately if the flight is not full, which means people may be spaced on the plane.

### Characteristics of the group

4.45 We asked whether airlines know the make-up of a group (for example travellers with children, somebody travelling with a carer/companion), if so at what stage this information becomes clear, whether the information is gathered proactively, and whether it is important. We also asked how airlines ensure their policies are fair.

---

<sup>16</sup> Information provided to us by the Royal Statistical Society indicates that sometimes seats (particularly window and aisle seats) might be held back, meaning that seating may not actually be completely random, and those who have not paid to select a seat may be more likely to be given a middle seat.

- 4.46 Airlines typically mentioned both children and PRMs as being passenger characteristics that were important.
- 4.47 Nine of the 10 airlines we spoke to gather information about passengers travelling with children. Typically this is so that children under 12 can be seated with at least one adult from their group. All nine airlines said they proactively request this information at the booking stage.
- 4.48 Nine of the 10 airlines told us they look for information about people travelling with particular needs at the stage where seats start to be allocated through airline systems. Four of these nine airlines said that passengers would need to input this information themselves – it was not specifically requested by the airline. For the other five, it was not clear if the airline proactively requested the information during booking or check-in or whether the passenger has to input it themselves but it can then be picked up by the airline. The final airline told us that “all possible efforts are made to allocate suitable seats to PRMs when travelling single or in a group” but did not provide information on how this was done.
- 4.49 Two airlines said that a group could be identified if they were travelling on the same booking reference. One airline said that they would try to link booking references where possible and where advised by passengers to do so. One airline told us that “there is no such thing as a 'group' in this context. All passenger bookings are for individual seats”.
- 4.50 Airlines agreed that the above information was important, typically due to safety and service quality considerations.
- 4.51 In terms of seating these passengers with their group, passengers travelling with children, people with particular needs, and large groups (such as school groups) are typically identified via checks run at certain times prior to departure (for example one, three and five days before departure). They are typically identified using keywords or codes in the booking data. Most airlines said that if such passengers have not been seated together already (for example by buying specific seats) then systems attempt to seat them together at this stage. If that fails, these travellers are flagged for manual checks so that a member of staff can try to seat them together. Some airlines hold back seats to the end to use to seat together those who require it. Airlines can also flag passengers for manual check-in at the airport, and in some cases cabin crew will be asked to move passengers on board to facilitate seating.
- 4.52 Airlines mentioned that frequently there are processes in place to seat those travelling with children or people with particular needs with their group (or at least one member of their group) together automatically for free. Such policies are outlined above. However, no airlines made clear how these policies are publicised. It is therefore likely that, due to the lack of available information,

some passengers may feel they need to pay extra to guarantee specific seats when in fact they do not.

### Implementation of policies in practice

- 4.53 Most airlines told us that procedures are predominantly automated (for example through seating algorithms or “robotics”). This was typically combined with procedures being documented in staff manuals, which was mentioned by five airlines. One airline told us their customer service centre staff and handling agents are given “full training” but did not provide further details. Two airlines said they cross check that policies are working by referring to customer contacts or complaints data.

### Complaints

- 4.54 We asked if complaints had been received relating to seating groups of two or more passengers in the past year, and if so how many, as well as what the complaints were typically about.
- 4.55 All the airlines told us they had received complaints.
- 4.56 Six of the 10 said the volumes were low, particularly in the context of the number of passengers carried in a given time period. The largest number of complaints reported (although not all airlines reported volumes) was 2,917 complaints on the issue on 2017 for one airline.
- 4.57 Four airlines mentioned that complaints typically involve families being split up.
- 4.58 One airline said that they do not recognise ‘groups’ and that seats are sold to individual passengers. Their complaints are typically from passengers who do not want to pay to reserve seats.
- 4.59 We also asked how seating complaints would typically be resolved. The airlines told us that where a passenger has paid to reserve a specific seat but did not get what they had booked they will refund the seat fee. They may make goodwill gestures where people are unhappy, on a case by case basis. Four airlines said they will explain that sitting together is not guaranteed and flag to passengers the option to pay for specific seats. We did not receive information about whether this complaints data has been used to drive changes or amendments to practices.

## Chapter 5

# Our assessment

---

## Introduction

---

- 5.1 The evidence we have reviewed throughout this project showed the practice of paid for allocated seating is of concern to a cohort of consumers, for a number of different reasons. This has been demonstrated by the original consumer research carried out in 2016 which revealed consumer views on the practice, as well as through our survey of recent fliers, which was representative of GB adults, and through our consumer engagement survey. The finding that consumers collectively may be paying from £160 million to £390 million per year for allocated seating demonstrates the practice is widespread. This is particularly the case given that the practice is relatively recent, which suggests that over time more consumers may become more aware of the risk of being split up and may consequently consider paying the add-on fee.
- 5.2 As the sector regulatory body, one of our strategic aims is to ensure that airlines compete on price and service, and that consumers drive improvements by making informed choices between providers. One of our statutory powers is to enforce general consumer protection law through Part 8 of the Enterprise Act 2002, as well as EU legislation relating to areas such as denied boarding compensation and passengers with reduced mobility. We have examined the issues raised by the review in this context, seeking to understand the implications of allocated seating practices for consumers and considering potential harm to consumers overall or to particular groups.
- 5.3 Below we set out the different issues which we encountered as we reviewed the evidence gathered, our views on these issues, and our next steps. We expect consumers to be treated fairly, and for the needs of consumers with particular characteristics to be recognised by service providers and taken into account. Where we find this not to be the case we will work with stakeholders to seek improvements, and we may take enforcement action.

## Trust in the market

- 5.4 Our twice-yearly Consumer Aviation Survey<sup>17</sup> shows that satisfaction with the travel experience is falling steadily (from 90% in spring 2016), although it is still relatively high, with 83% of respondents saying they were satisfied with the overall travel experience during their last flight. The survey also found that

---

<sup>17</sup> See: [http://publicapps.caa.co.uk/docs/33/CAA%20Aviation%20Consumer%20survey%20--%205th%20wave%20report%20FINAL%20\(2\).pdf](http://publicapps.caa.co.uk/docs/33/CAA%20Aviation%20Consumer%20survey%20--%205th%20wave%20report%20FINAL%20(2).pdf).



although 77% of respondents had booked online, which should make it easier to carry out comparisons, just half (55%) of respondents found it easy to understand how much it costs to travel with different airlines and to make comparisons between them, while 20% of respondents actively disagreed that it was easy.

- 5.5 Our consumer engagement survey found that people believed they were being deliberately separated by airlines as a way to make money, and not surprisingly this meant they felt dissatisfied with the airline. The survey of recent fliers underlined this, with 46% of respondents saying they felt negatively towards the airline when they realised they would have to pay more to guarantee sitting together. Whilst we recognise that price partitioning may have benefits for some consumers, in this case the practice may create increased or unnecessary costs for others.
- 5.6 One reason people may feel seating charges are particularly unfair is because, while consumers may tolerate extra fees to pay for an upgraded version of a product or service, here passengers feel they are being charged for a downgraded version of the product they used to have (being sat with their group automatically in most cases). Consumers perceive value based on a reference point. Here, the reference point was based on being able to sit together, albeit perhaps in economy with less space. Respondents to our consumer engagement survey are making the point that, where the underlying fare is the same or higher, a downgrade has been engineered in order to extract more revenue, and this may be what is triggering the perception of unfairness. This is especially important because consumers are not able to learn and self-correct their behaviour to avoid the fee for seating. If they want to guarantee that they can sit together then the fee is unavoidable.
- 5.7 Respondents to our consumer engagement survey told us:
- “It was annoying and stupid. We were sat at opposite ends of the plane. The person sitting beside me also had a friend at the back of the plane so we swapped seats... It's just stupid that they deliberately separate people for no reason other than to try and squeeze more money out of you to buy a seat.”*
- “We checked in online at the given time 1 week before, there was lots of seats available as I checked before I checked in ... but when I checked in my partner was in 10f and they put me in 15a (I checked us both in together). This was shocking as they had rows and rows of seats available. I then got a pop up message saying ‘not happy with your seats, you can still sit together and pay the fee’ I could not believe it.”*
- 5.8 The developing practice of allowing consumers to pay to choose their own seat means that even where airlines do have systems in place to seat groups, families or companions together they may be unable to, depending on which

seats have already been sold. This also has implications for consumer trust and engagement with the market.

- 5.9 We are concerned that consumer trust and therefore engagement in the market may be being undermined by allocated seating practices with the result that consumers could be incentivised to disengage from shopping around. This could weaken competition between airlines and mean consumers are unlikely to get the best deal for their needs. We deal with these issues in more detail below.

## Transparency and clarity of price

---

- 5.10 Here, we are concerned about two possibilities:
1. That consumers could over-estimate the likelihood of being split up and so pay the add-on fee even if the chances of being split up are low.
  2. Alternatively, consumers may be correct to believe they are likely to be split up. However, in this scenario (for those who are concerned about being split up) they are unable to see the final ticket price, including the add-on fee, at the start of the booking process.

## Over-estimating the likelihood of being split up

- 5.11 Our research found that the chances of being sat with your group (if you did not pay extra to do so) varied widely between airlines, and the information on likelihood of sitting together without paying does not appear to be disclosed by airlines at the points where allocated seats are sold. This raises a question around uncertainty: consumers cannot be sure if they really need to buy the add-on or not in order to sit together.
- 5.12 Our estimates show that across the industry almost half (45%) of total paid-for seat allocations may not be necessary based on the end result of sitting together: these people would have been seated together anyway, without paying extra. This equates to between 6.8 and 10.4 million passengers spending around £74 million to £175 million unnecessarily each year.<sup>18</sup> Whilst some consumers may gain some benefit from the certainty of knowing they will be able to sit together once they have paid, as explored in more detail below, this may impact some groups (such as those with accessibility needs or those travelling with

---

<sup>18</sup> We took the number of people who were first notified about purchasing seats before the check-in process but did not buy a seat, then calculated the proportion of this group that sat together anyway. We used this estimate as a proxy for the number of people buying seat allocations that would have sat together anyway without paying extra to do so. Using this approach, we calculated that 73% of people would have sat together anyway. From our survey we also know that 38% paid for their allocated seats in the knowledge that they had been split up (therefore not unnecessarily spending money). From these observations, we can estimate that 45% of total paid-for seat allocations are not necessary. We then applied our estimated annual cost of paid-for seats, which ranged from £160 million to £390 million per year.

young children) more than others. We don't believe it is acceptable to expect such passengers to pay for certainty, without them understanding the underlying likelihood of being sat together without paying.

- 5.13 In addition, consumers should be made aware where, for example, airlines have systems in place to try to place consumers together even where they have not paid extra, and consumers should be clearly made aware of the chances of being split up before paying extra for allocated seats. It is possible that airlines may move passengers who have paid for specific seats in order to comply with other regulations or guidance, seating children with a parent or guardian. Airlines should ensure they have processes in place that can adequately deal with the needs of all passengers on the flight, including those who have bought specific seats. Where a passenger has paid for a specific seat, our view is that they are entitled to sit in this seat, in the configuration specified.

### Increased search costs

- 5.14 The airlines' responses to our information request, as well as the CAA's own desk research, revealed that charges for allocated seats vary widely. We found that charges to select specific seats varied from £1.99 up to £100 on some long-haul business class flights. Prices are per seat, per journey leg. There can be different tariffs for seats within each flight, costs may vary over time for the same flight, and charges can vary between flights and between airlines. Widely varying charges, both between airlines and within flights, can make it difficult for consumers to calculate the cost of sitting together, and thus harder to compare tickets on different airlines when making a purchasing decision.
- 5.15 Just over a third of respondents to the survey of recent fliers paid extra to ensure they could sit together, and most of these said they did so as "they did not want to risk not sitting together if they didn't pay". For this group, that are sure they want to sit together and are willing to pay extra to ensure it, there is currently no way to include this information at the start of a search. The result is that the selection has to be made later in the process, making it unclear what the final price will be, and consequently making it more difficult to compare results across airlines.
- 5.16 We do note that the survey of recent fliers found that some of the people who did not sit together were not concerned about doing so. This cohort equated to half of the respondents that did not sit together (392 respondents). This excluded respondents who did sit together (including those who paid to ensure they sat together). They told us that either they were "not bothered enough about sitting together to pay extra to do so" or that they were "not bothered for reasons such as it being a short flight or they didn't mind sitting apart".
- 5.17 We did not find evidence that those consumers that want to sit together are able to factor this into comparisons or booking flows. This is true of both airline

websites and third-party intermediaries.<sup>19</sup> We are concerned this could also be problematic in the context of digital comparison tools (such as price comparison websites or specialised apps) since these do not appear to have the ability currently to reflect consumer preferences to sit together in search parameters and reflect the costs of this in the results returned.

- 5.18 It is well established that consumers need to know the full cost of a good or service in order to make accurate comparisons and engage in the market effectively, helping to drive competition.<sup>20</sup> We were concerned therefore that search costs for consumers could be increased because those consumers who want or need to sit with their group do not have the opportunity to factor this into their comparison. This in turn has the potential to result in higher prices if competitive rivalry between firms is softened.<sup>21</sup> In addition, vulnerable passengers could be at greater risk of detriment.
- 5.19 In this context we note the provisions of the CPRs. Regulations 5-7 of the CPRs prohibit commercial practices which are misleading (whether by action or omission) or aggressive, and which cause or are likely to cause the average consumer to take a different transactional decision. A practice can mislead by action or omission or both, and prohibitions 5 and 6 are designed to ensure that consumers get the information they need to make an informed decision in a clear and timely fashion.
- 5.20 Aggressive practices are practices that, in the context of the particular circumstances, intimidate or exploit consumers, restricting their ability to make free or informed choices. This may occur by harassment, coercion (including physical force) or undue influence. Undue influence is defined in regulation 7(3)(b) of the CPRs as “*exploiting a position of power in relation to the consumer*”

---

<sup>19</sup> We focused on online comparisons because our Aviation Consumer Survey shows that the majority of consumers both search and book online.

<sup>20</sup> See for example the Competition and Markets Authority market study on *Digital Comparison Tools*, available at: <https://www.gov.uk/cma-cases/digital-comparison-tools-market-study>.

Separately, on Car Rental Intermediaries the CMA stated “*Consumers need to know the true cost of the rental upfront when looking to book a vehicle; this cost should not come as a surprise to them later in the Booking Process or at the rental desk. Consumers cannot make informed decisions about the rentals on offer and assess which offer best meets their needs without accurate and complete information on prices*”. Available at: <https://www.gov.uk/cma-cases/car-rental-intermediaries>.

<sup>21</sup> Work done on *Advertising of Prices* by the Office of Fair Trading in 2010, which included collecting evidence about pricing practices through academic psychology studies, experimental research, and consumer surveys, concluded that clear, honest, upfront advertising of prices is beneficial to both consumers and competition. The report considered the seven most common price framing practices, and of the practices considered, the OFT found ‘drip pricing’ to have the most potential to mislead consumers. The report pointed out that not only do consumers need to be confident that the advertising they see meets the appropriate standards, but fair dealing businesses need to be confident that firms using unfair pricing practices will be subject to effective enforcement action.

*so as to apply pressure, even without using or threatening to use physical force, in a way which significantly limits the consumer's ability to make an informed decision".<sup>22</sup>*

- 5.21 The above provisions could apply to the average consumer or to the average member of a targeted or vulnerable group. The latter might include those travelling with children for example, who may be more susceptible to feeling they need to purchase seats together if they worry they may be split up. It could equally apply to those with accessibility needs (including hidden disabilities) and others, such as anxious fliers. It is important that airlines ensure they are aware of their obligations under the CPRs, and that they take proactive steps to ensure that they are compliant with these obligations.
- 5.22 One way to address this could be to price seat allocation into ticket costs automatically. However, some consumers do not exhibit strong preferences on sitting together and may prefer cheaper seats with the possibility that they could be separated from their group. Clearly other groups of travellers either want or need to ensure they can sit together and feel strongly about this. We go into this in more detail below, including the impacts on specific groups. We would like to see airlines provide the option for people to price seating into searches, so that consumers are able to make quicker, easier and more accurate searches.
- 5.23 **Next steps:** We have already published information on our own websites on the chances of being separated if not paying extra to guarantee seats by airline. We will now work with airlines to explore ways to improve direct booking channels. This will include how paid options such as seating allocation are presented, and at what stage of the booking process. Websites may need to be changed so that the appropriate information is obtained from the consumer at the start of the process before the price is returned. It may be helpful to include an option where sitting together is priced into the final ticket cost automatically, with an opt-out for those who are not concerned.

## Provision of information to third parties

---

- 5.24 A related issue is indirect booking channels and the provision of information to third parties. Our Aviation Consumer Survey shows that while 42% of people research directly with an airline, 30% use a flight or travel comparison site, 21% research directly with a holiday company and 16% through a travel agent.<sup>23</sup> It is

---

<sup>22</sup> Detailed information is provided in the guidance on the UK Regulations (May 2008) implementing the Unfair Commercial Practices Directive published by the Office of Fair Trading and the Department for Business, Enterprise and Regulatory Reform in 2008:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/284442/oft1008.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/284442/oft1008.pdf).

<sup>23</sup> See: <http://publicapps.caa.co.uk/docs/33/CAA%20Aviation%20Consumer%20survey%20-->

important that consumers are able to make accurate comparisons when using indirect channels. While reviewing the evidence we considered whether third parties are useful in helping consumers to carry out informative searches and return results which are useful for their needs. We also received representations from one online travel agency which welcomed our review and raised concerns that currently intermediaries are not able to easily access ancillary airline data. This leads to less accurate comparisons and hampers the ability of consumers to carry out effective searches. Making information such as that on seat allocation available to intermediaries would help to avoid these problems, incentivising detailed and accurate comparisons, and helping consumers to drive competition.

- 5.25 In this context we note the 2018 Competition and Markets Authority (CMA) report on Digital Comparison Tools,<sup>24</sup> which found that Digital Comparison Tools (DCTs) need access to a range of inputs to be able to deliver high quality comparisons. The study identified flights as a sector where there could be a risk that DCTs may struggle to access comprehensive flight and amenity data. Should the risk materialise, the CMA highlighted that there could be negative consequences for consumer outcomes. At the stage of publication, the CMA had not seen evidence of consumer detriment. However, this review has found that consumers do view the issue of allocated seating as important, and has found that it can be difficult to compare costs without incurring high search costs, as well as the possibility that some consumers may be buying allocated seats unnecessarily.
- 5.26 The CMA stated that “relatively few airlines do not engage with the DCT channel at all, though a greater number appear to be doing business with more restrictive terms”.<sup>25</sup> This is potentially of concern to us as it appears that DCTs may be restricted from accessing the information they need if they are to include the costs of sitting together in comparisons. We note that airlines already provide information to third parties and have commercial agreements with them. Since this is already the case, we feel that more could be done to ensure that third parties have all of the information they need to make accurate and useful comparisons for consumers.
- 5.27 The CMA also noted the international nature of aviation and that the European Commission has been considering whether there may currently be restrictions that affect the ability of DCTs to access flight data. There are a range of

---

[%205th%20wave%20report%20FINAL%20\(2\).pdf](#).

<sup>24</sup> Competition and Markets Authority, *Digital Comparison Tools*, September 2017. See in particular Annex D at: <https://assets.publishing.service.gov.uk/media/59c93771e5274a77468120d7/paper-d-making-comparison-easier-and-more-effective.pdf>.

<sup>25</sup> Competition and Markets Authority, *Digital Comparison Tools*, September 2017, Annex D.



developments in the functionality of DCTs which could address some of the issues raised.

- 5.28 **Next steps:** We will further engage with airlines, digital comparison tools and online intermediaries to explore how better information might be made available to such third parties in a timely manner to ensure they have the ability to provide accurate and up-to-date information to consumers. We will engage with the European Commission to explore any restrictions on the ability of DCTs to access flight data and how these might be addressed. We will also work with the CMA to further explore developments in the functionality of DCTs.

## Impact on people with accessibility needs, including hidden disabilities

---

- 5.29 As stated above, people may want to sit together for a wide variety of reasons, one of which may be that they are travelling with a companion who they are assisting or who needs to provide assistance for them. In such cases, sitting together may not be an optional extra: it may be very difficult or impossible for them to fly without a companion close by. Accessibility needs may be visible, but they may also be hidden.
- 5.30 The survey of recent fliers found that 14% of people who booked tickets for a group either had a disability, health or medical condition that would have an impact on travelling themselves or were travelling with somebody who did. We did not find significant differences between this cohort paying to sit together and those paying to sit together overall. In addition, groups that contained a passenger with accessibility needs sat together the same proportion of the time (18%) as groups overall. This suggests that passengers who should be allocated a seat next to a companion without having to specifically purchase one are not aware of this option, and also that airlines are separating passengers with accessibility needs from their companion in the same proportions that other groups are separated. This suggests airlines may not have effective processes in place to make all reasonable efforts to seat passengers with an accessibility need with a companion.
- 5.31 In line with the survey of recent fliers, 11% of respondents to our consumer engagement survey either had a disability, health or medical condition that would have an impact on travelling themselves or were travelling with somebody who did. 7% of respondents to this survey told us that they or someone in their group had a disability, yet they were allocated seats apart. Some respondents told us that they had a physical disability and had booked assistance, and that they expected this to mean they would be seated together as one person was assisting or caring for another. Other respondents told us of passengers with hidden disabilities, for example autistic children, and the problems that arose when they were separated.

5.32 The comments below illustrate some of the issues we were told about:

*“Despite me having airport assistance booked - and noted on my records - our return seats were supposed to have been in 8f and 33d! I don’t know what support my husband could give me when we were almost at opposite ends of the plane! We had no choice but to pay the extra money to ensure we had two seats together. This added to the expense of our 3 day break and put me off doing this again!”*

*“It was a difficult experience as my son has ADHD a hidden illness and there was no alternative seating available. It would have been better if we could have sat at the back of the plane all together. It would have been less stressful for me as I could have supported him more effectively and resulted in more positive experience for him, the rest of the family, other passengers and the crew on board. [The airline] staff were not accommodating or understanding.”*

### Compliance with the CPRs

- 5.33 The CPRs refer to three types of consumer: the ‘average consumer’, the ‘average member’ of a targeted group of consumers and the ‘average member’ of a vulnerable group of consumers (as appropriate). Where a “clearly identifiable group of consumers is particularly vulnerable to the practice or to the underlying product because of their mental or physical infirmity, age or credulity in a way which the trader could reasonably be expected to foresee” and “where the practice is likely to materially distort the economic behaviour of only that group”, then it is the average member of that group that is the relevant average consumer.<sup>26</sup>
- 5.34 Regulation EC 1107/2006 provides additional protection, as it specifically requires airlines to make all reasonable efforts to give people accompanying a passenger with disabilities or reduced mobility seats next to the disabled passenger. We consider that airlines should ensure they have systems and processes in place which make it easy to identify travellers who may be at risk of vulnerability, and to make adjustments to take the needs of this group of travellers into account.
- 5.35 We are concerned that people with accessibility needs might be paying more than they need to, as airlines may have put in place processes to seat these groups together with no extra charge. However, this may not be made clear in advertising and booking flows. It was apparent from some of the responses to our consumer engagement survey that some people do feel they have to pay extra to ensure they can sit with a companion or assistant. We are aware that

---

<sup>26</sup> Regulation 2(5) of the Consumer Protection from Unfair Trading Regulations 2008.



research has shown that disabled people often face extra costs, including for essentials such as energy and insurance.<sup>27</sup>

- 5.36 In order to be compliant, it is important for airlines to consider whether their practices impact disproportionately on particular groups and take steps to ensure this does not occur. In our view it is not acceptable for consumers that need to sit with a companion so they can be provided with essential support and assistance to either feel they need to pay extra to guarantee a seat next to a companion or to need to pay extra to ensure they are seated with a companion. We consider that airlines must ensure it is clear up-front, before booking, that people with accessibility needs (including those with hidden disabilities) can inform the airline of their needs if they wish to do so, how and when to do this, and to make clear that such groups will be seated together without the need to pay extra. The last point should be made clear again at all times when passengers are offered the option to pay for seats. This will ensure that those with accessibility needs are not being induced to pay for seats when the airline in fact has processes in place to seat them with a companion for free.

### **Compliance with Regulation EC 1107/2006**

- 5.37 Regulation EC 1107/2006 requires all reasonable efforts to be made to give people accompanying a passenger with disabilities or reduced mobility seats next to one another. As set out above, nine of the 10 airlines told us they look for information about people travelling with particular needs. Four of these airlines said that passengers would need to input this information themselves – it was not specifically requested by the airline. For the other five it was not clear if the airline proactively requested the information during booking or check-in or whether the passenger had to input it themselves (with the airline picking up on the information via key words or other means). One airline told us that they do not recognise group bookings as all bookings are for individual seats, while another told us that it “makes all possible efforts to allocate suitable seats to PRMs” but did not provide information on how this was done.
- 5.38 In order to comply with Regulation EC 1107/2006 we consider that airlines should proactively seek information on whether passengers are travelling with a companion or carer to help and assist. Such information should be requested from passengers at an early stage in the booking stage, and should prompt passengers to input data that will be useful in describing their needs while on board (such as whether they will need assistance from a companion with using seat belts or oxygen masks, with eating or drinking, or with hearing or seeing announcements). Airlines should have clear processes in place to ensure the

---

<sup>27</sup> See for example report by Scope, *The Disability Price Tag*, February 2018: On average, disabled people face extra costs of £570 a month related to their impairment or condition, available at: <https://www.scope.org.uk/campaigns/extra-costs/disability-price-tag>

information is then used to make sure relevant passengers are seated together. Overall, we consider that airlines have so far not fully demonstrated to us that they have robust processes in place to seek and use such information.

- 5.39 It is important to recognise that some people do travel as part of a group due to specific accessibility needs, including those with hidden disabilities. Such people may be unfairly penalised if that recognition is not forthcoming, and airline policies and practices should reflect this reality. The information referred to above will also be of wider benefit to help airlines obtain useful information on people's needs and the levels and types of support required.
- 5.40 **Next steps:** We will raise the above issues with airlines, alongside sharing and monitoring performance against good practices. We will continue to keep compliance with Regulation EC 1107/2006 under review though our ongoing work in this area, including via our regular meetings with airlines, our work on compliance with Regulation EC1107/2006, and our work with airlines to improve how the needs of those with hidden disabilities are taken into account. If we find evidence of systematic non-compliance we may take enforcement action.

## Impact on people travelling with children

- 5.41 Throughout the project, one of the particular concerns raised has been people travelling with children being separated and sat in different sections of the plane. 19% of respondents to the survey of recent fliers were travelling with children aged 2 to 12 years, and 12% were travelling with children aged 13 to 16 years. 18% of the people who paid extra to ensure they could sit together said they did this because they were travelling with children. 27% of groups that travelled in the last 12 months with at least one child (2-16 years) and did not pay extra to sit together, did not end up sitting together.

- 5.42 Separately, almost a third of respondents to our consumer engagement survey described themselves as travelling with children. People worried about being separated and described the impact on themselves and their families:

*“Our whole party, including our 3 year old son were seated separately on the way home. We phoned the call centre, asked at the check-in and gate but were told to sort it out on board. After a couple near us heard what was happening, they offered to move, but it was very stressful.”*

*“We assumed children would be allocated a seat with their parents...It is easy to check family name and age of traveller, to ensure a child sits with their parent. For this reason I am convinced we were deliberately separated, to force us to pay.”*

- 5.43 13% of respondents to our consumer engagement survey told us they were travelling with children and that the seats they were allocated separated one or

more child from the parent(s).<sup>28</sup> This means that 48% of those who responded to the survey and were travelling with children were separated from their children. From the comments it was apparent that this was a big concern, and may have been one of the reasons driving people to respond to the survey in the first place.

- 5.44 People were concerned about being separated from their families for different reasons, including because they were travelling with very young children, because their children had particular needs, safeguarding issues, safety issues such as assisting in a situation such as cabin decompression or turbulence, and safety in case of an emergency evacuation. We deal separately with the safety aspects below. Many people also simply felt strongly that they should not be separated from their children.
- 5.45 In line with European guidance, the CAA recommends that children should be seated close to their parents or guardians. Young children and infants who are accompanied by adults should ideally be seated in the same seat row as the adult. Where this is not possible, children should be separated by no more than one seat row from accompanying adults. Whenever a number of infants and children are travelling together the airline should make every effort to ensure that they can be readily supervised by the responsible accompanying adults.
- 5.46 We note that nine of the 10 airlines we spoke to gather information about passengers travelling with children, typically so that children under 12 can be seated with at least one adult from their group. All nine airlines said they proactively request this information at the booking stage. Nonetheless we are concerned by the figures above, that 48% of those who responded to the survey and were travelling with children were separated from their children. This suggests that airlines may not be fully compliant with the relevant guidance in practice.
- 5.47 Turning to the results of the quantitative survey of recent fliers, we note that the chances of sitting together without having paid extra to do so were highest (amongst the 10 airlines we spoke to) on Flybe and TUI. One of these airlines told us that their online system is set up to ensure all customers in the same booking will be sat together wherever possible and that handling agents are advised to pre-edit the flight seat plan for families and parties of four or more to ensure that where possible they are sat together. The other advised that it holds back a number of seats in blocks specifically to enable it to resolve issues with family seating before departure. These types of practices may help to ensure airlines are able to comply with the relevant guidance.

---

<sup>28</sup> Of the children that were separated, 8% were 2 years old or younger, 64% were aged 2-12 years old, and 28% were aged 13-16 years old.

- 5.48 **Next steps:** In order to comply with the guidance set out above, airlines should take proactive steps to seat those travelling with children together. Consumers should be informed clearly, and before being offered the opportunity to pay for specific seats, that this is the case. Airlines should have robust procedures in place to ensure they are compliant with the relevant guidance in practice. In this report we have proposed an assessment framework, which includes transparency matters, and which can be used to assess how clearly airlines address such transparency issues in this context.
- 5.49 We deal with the associated safety concerns that have been raised below.

## Safety considerations

---

- 5.50 A small but important percentage of respondents to our consumer engagement survey raised safety issues, including whether emergency evacuation could be impeded if people were separated from friends and family. This was particularly important to those travelling with children, and linked to the issues described above, but may also affect many other groups including people with accessibility needs (who may need assistance to exit the plane or to deploy oxygen masks, for example), or those travelling with other relatives. Some examples of the comments we received include:

*“I don't think [airline] are thinking of the health and safety of their customers as in an emergency family/friends will naturally gravitate towards each other prior to emergency evacuation causing chaos and impeding others safe exit.”*

*“I feel this policy is dangerous. If there was an emergency evacuation parents would try to reach their children at all costs causing potential chaos.”*

- 5.51 In addition to this, a recent report by the Royal Aeronautical Society considered the issue of passenger seat allocation and noted the ongoing CAA review. The report recommended that operators should not charge for family members to sit together.<sup>29</sup>

## Current guidance

- 5.52 Current EASA guidance<sup>30</sup> sets out that children accompanied by adult(s) should ideally be seated in the same seat row as the adult. In twin-aisle aeroplanes, children and accompanying adults should not be separated by more than one aisle. When this is not possible, then children should not be seated more than

---

<sup>29</sup> Royal Aeronautical Society, *Emergency Evacuation of Commercial Passenger Aeroplanes*, April 2018. See: <https://www.aerosociety.com/media/8534/emergency-evacuation-of-commercial-passenger-aeroplanes-paper.pdf>.

<sup>30</sup> GM2 CAT.OP.MPA.155(c) to Commission Regulation (EU) No 965/2012 of 5 October 2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council.

one seat row forward or aft, from accompanying adult(s). In safety regulation terms, a 'child' is defined as a person under 12 years of age, and restrictions exist in terms of children not being allowed to sit in defined emergency exit locations.

- 5.53 CAT.OP.MPA.165<sup>31</sup> requires operators to establish procedures to ensure that passengers are seated where, in the event that an emergency evacuation is required, they are able to assist and not hinder an evacuation. Therefore, if there is potential for hindrance to evacuation by separating passengers, operators should ensure appropriate procedures are in place to mitigate the risk regardless of commercial policy.

### Information from airlines

- 5.54 Airlines have told us that issues with seating children together with parents or guardians, where not dealt with during seat allocation or at check-in, will usually be dealt with upon boarding the aircraft by the cabin crew. This may be because systems in place to allocate seats together have not been able to do so, for example because not enough contiguous seats were left. We are concerned that due to recent changes to seating allocation procedures at the booking stage, cabin crew may now be facing increasing challenges in this area, particularly due to the limited options they may have and pressure to ensure on-time performance. The CAA's view is that these concerns must form part of each airline's risk assessment.

### CAA review

- 5.55 The CAA ensures that appropriate procedures are in place to mitigate risks in practice through CAA inspectors conducting flight checks which include observations of live passenger flights.
- 5.56 Following a review of the safety implications associated with family members being separated on board the aircraft, we have been unable to identify evidence from evacuation trials that indicates that the likely success of an aircraft evacuation would be materially impacted by groups and/or families being separated on board passenger aircraft. We do, however, note that group allocated seating practices are relatively recent, and for this reason we will be looking at the issue further to ensure operators are taking the issue into consideration as part of their risk assessments.
- 5.57 With regards to the report by the Royal Aeronautical Society, our safety role is to check that operators ensure that requirements concerning passenger seating, are complied with. The data we use to check this relates to how often the way seats are allocated created a problem that could not be resolved on the aircraft,

---

<sup>31</sup> See Commission Regulation (EU) No 965/2012.

or was difficult to resolve. This may be different to the data used by the Royal Aeronautical Society to reach its conclusions.

- 5.58 **Next steps:** The CAA's Flight Operations Department continues to investigate this issue. The CAA will carry out focused oversight against applicable requirements in this area, identify instances of non-compliance with regulations and observe where practices may be improved. The CAA will also highlight this report to EASA for further consideration.
- 5.59 In addition, we are currently engaging with the Royal Aeronautical Society to understand more about their recommendation and the underpinning evidence. We will also engage with airlines via the Flight Operations Liaison Group to understand the processes airlines have in place to comply with safety regulations and good practice in this area.

## Use of algorithms

---

- 5.60 When booking online, airlines have told us that pricing flows may be guided by algorithms. In addition, airlines use algorithms or "robotics" to assign seats (in particular where consumers have not paid to choose a specific seat). Some airlines told us they have active attributes in their algorithms to make sure groups are placed together even if they have not paid. They may search for keywords such as 'child' for example, identify groups containing these characteristics, and place them together where possible. At this stage we have not examined how they are set up and the outcomes they are intended to produce.
- 5.61 We are aware of a number of emerging risks in this area:
- algorithms combined with 'big data' (the ability for firms to analyse large data sets to explore patterns, trends, and associations) could actively look for evidence that consumers have a high willingness to pay for seats together, increasing the risk that personalised prices could be charged to consumers who need or want to sit together. This might also increase further the variability of the add-on charge for seats;
  - algorithms could be used to scramble seating for those passengers identified as having a higher willingness to pay to sit together in order to generate greater demand for allocated seating; and
  - there is potential for algorithms to be sourced from the same firm, leading to a risk of co-ordination in the way the algorithms are set up and the outcomes they generate.
- 5.62 Our focus is firmly on the outcomes achieved in practice. For example, in the context of allocated seating, we have considered the inputs where possible (such as whether airlines proactively ask or allow consumers to input information on their seating needs at any point in the booking process) along with the outcomes

(for example, whether are consumers with accessibility needs are told if the airline will make efforts to place them with a companion for free before they are given the opportunity to pay for seats together). Examining the outcomes allows us to draw conclusions on whether a given airline's system is set up to allow compliance. Use of algorithms does not offer a defence against breaches of the law, including in cases where such breaches are inadvertent.

- 5.63 **Next steps:** This is a fast-moving area that we will keep under review. We are, for example, in the process of applying to the Regulatory Pioneers Fund for funding to develop a project to explore whether and how regulators could gain greater oversight capabilities in relation to the use of automated systems, the outcomes of which would be shared with other regulators and government. In addition, we will discuss with the CMA its work on automation and its application in this context.

## Ensuring that policies are implemented in practice

---

- 5.64 We were concerned to note that, from responses to our information request to airlines, most of the 10 airlines we spoke to do not appear to proactively check that policies are implemented in practice. One airline told us that they carry out standard assurance checks locally, and their training team follow up with ground crew on seat allocation as part of ground crew's training and airport assessments – which was an example of good practice. Overall, however, this is of concern to us as it is vital that policies work in practice and that this is validated so that businesses know policies are working and can make amendments where they are not.
- 5.65 **Next steps:** This is an area we will follow up with airlines through our ongoing work in this area.



## Chapter 6

## Assessment framework

---

- 6.1 In order to address the issues around compliance with the law, adherence to guidance, and to promote good practice, the CAA plans to introduce an assessment framework. This will enable airlines to self-assess, as well as allowing the CAA to evaluate performance in an objective manner.
- 6.2 Some of these criteria relate to unambiguous requirements, such as ensuring that those with accessibility needs can sit with a companion without having to pay extra, or ensuring that adults travelling with children under the age of 12 are able to sit close together.
- 6.3 The framework will also promote good practice and will provide information which can be used by consumers – either directly, or indirectly via informed third parties such as consumer organisations or representative groups. We welcome stakeholder views on the proposed framework.

### Proposed framework

---

- 6.4 We intend to use the following high-level criteria to assess airline practices and compliance in an objective and measurable way. At this stage we have focused on the online booking channel since our Aviation Consumer Survey shows that the majority of consumers both search and book online.
- 6.5 Suggested criteria for assessment include:
- whether the headline price includes a guarantee of sitting together or not;
  - whether the chances of sitting together if the consumer doesn't specifically purchase this option are made clear at relevant stages;
  - the number of steps that need to be taken when booking to obtain a final price that includes sitting together;
  - the provision of information to third parties such as comparison tools;
  - if, at an early stage of the booking process, there are proactive options or prompts to add information about travelling with particular categories of passenger such as children, older passengers or people with accessibility needs;
  - whether fees are requested to guarantee sitting next to the categories of passenger above; and



- whether airlines have adequate processes in place to ensure that commitments made are fulfilled in practice.

6.6 Similarly to previous CAA compliance reports,<sup>32</sup> we plan to award an assessment category, which will enable us to rank airlines and provide a clear and easily understandable quality signal to consumers on this important issue. We plan to use the following assessment categories:

- very good
- good
- requires improvement
- poor

## Implementation

---

6.7 During the last quarter of 2018, we will engage with stakeholders to develop the proposed framework, take into account stakeholder comments (with a particular focus on good practices), and make an assessment of airlines. We plan to implement the framework in the first half of 2019, including publishing a report assessing airlines against the framework and setting out our conclusions. We will then continue to keep the issue under review, and will consider updating the framework periodically or taking other steps to drive improvements for consumers.

---

<sup>32</sup> See for example <http://publicapps.caa.co.uk/docs/33/20180711%20CAP1679%20FINAL.pdf> and <http://publicapps.caa.co.uk/docs/33/CAP%201500%20FEB17.2.pdf>.

## Chapter 7

## Recommendations, next steps, and timings

---

- 7.1 The review has raised a wide variety of issues, including around clarity and transparency of pricing, and the information made available to third parties and how this impacts on consumer search. We have highlighted particular impacts on specific groups such as those with accessibility needs and those travelling with children. These are areas that we take particularly seriously. We expect consumers to be able to make frictionless searches that return useful and relevant results that enable them to make an informed decision. And we expect airlines to ensure they have taken into account the needs of groups of travellers with specific needs – and that such groups are not penalised unfairly when considering seating.
- 7.2 The review also explored other areas such as potential safety concerns and the use of algorithms in the design and functioning of websites, booking engines and seating policies. This section brings together the different work strands we will be taking forwards to address the issues raised.

### Assessment framework

---

- 7.3 Firstly, we have proposed an assessment framework that will be published periodically in a transparent and accessible way. It will enable airlines to self-assess and will allow the CAA to evaluate performance in an objective manner – particularly where requirements are unambiguous – and highlight good practices.
- 7.4 The framework is intended to cover various issues raised throughout the review, including compliance with relevant legislation and guidance, transparency issues, consumers' ability to make effective searches and comparisons, and impacts on particular categories of passenger. The framework will also assess whether airlines have adequate processes in place to ensure that commitments made are fulfilled in practice. We welcome stakeholder views on the proposed framework.
- 7.5 In late 2018, we will engage with stakeholders to develop the proposed framework, take into account stakeholder comments, and make an assessment of airlines. We plan to implement the framework in the first half of 2019, including publishing a report assessing airlines against the framework and setting out our conclusions. We will then continue to keep the issue under review, and will consider updating the framework periodically or taking other steps to drive improvements for consumers.

## Clarity and transparency of pricing

---

- 7.6 We have already published information on our own websites on the chances, by airline, of being separated if not paying extra to guarantee seats. Throughout the remainder of 2018 and during the first half of 2019, we will work with airlines to explore ways to improve direct booking channels. This will include how paid options such as seating allocation are presented, and at what stage of the booking process. Websites may need to be changed so that the appropriate information is obtained from the consumer at the start of the process before the price is returned. It may be helpful to include an option where sitting together is priced in to the final ticket cost automatically, with an opt-out for those who are not concerned. We will particularly focus on any disproportionate impacts on particular groups of consumers.
- 7.7 At the same time, we will further engage with airlines, digital comparison tools and online intermediaries to explore how better information might be made available to such third parties in a timely manner to ensure they have the ability to provide accurate and up-to-date information to consumers. We will also engage with the European Commission to explore whether there are restrictions on the ability of DCTs to access flight data and how these might be addressed, recognising the international dimension in the aviation market. We will discuss developments in the functionality of DCTs with partners including the CMA.

## Impacts on those with accessibility needs

---

- 7.8 We will prioritise areas that we feel may impact unfairly on people with accessibility needs. We will raise these issues with airlines, alongside sharing and monitoring performance against good practices, and will continue to keep compliance with both the CPRs and Regulation EC 1107/2006 under review though our ongoing work in this area, including via our regular meetings with airlines, our work on compliance, and our work with airlines to improve how the needs of those with hidden disabilities are taken into account. If we find evidence of non-compliance we may take enforcement action.

## Travelling with children and safety aspects

---

- 7.9 Those travelling with children are another group whose needs are important. In order to comply with the relevant guidance, airlines should take proactive steps to seat those travelling with children (particularly children under 12) together. Consumers should be informed clearly, and before being offered the opportunity to pay for specific seats, that this is the case. Airlines should have robust procedures in place to ensure they are compliant with the relevant guidance in practice.
- 7.10 In terms of safety, the CAA's Flight Operations Department will also continue to investigate. The CAA will carry out focused oversight against applicable

requirements in this area, identify instances of non-compliance with regulations and observe where practices may be improved. The CAA will also highlight this report to EASA for further consideration.

- 7.11 In addition, we are currently engaging with the Royal Aeronautical Society to understand more about their recommendation and the underpinning evidence. We will also engage with airlines via the Flight Operations Liaison Group to understand the processes airlines have in place to comply with safety regulations and good practice in this area.

## **Working with others**

---

- 7.12 Finally, we will also keep other relevant areas under review, including by working with appropriate stakeholders. We are, for example, in the process of applying to the Regulatory Pioneers Fund for funding to develop a project to explore whether and how regulators could gain greater oversight capabilities in relation to the use of automated systems, the outcomes of which would be shared with other regulators and government. In addition, we will discuss work on automation with the CMA to explore possible learning from other sectors.

**APPENDIX A****Survey of recent flyers**

---

**Group Flights**

---

Conducted by YouGov on behalf of Civil Aviation Authority.

Fieldwork Dates: 28<sup>th</sup> December 2017 - 9th January 2018.

All figures, unless otherwise stated, are from YouGov Plc. Total sample size was 14,716 adults, of which 4,296 have flown as part of a group where they were the ticket holder in the last year. The survey was carried out online. The figures have been weighted and are representative of all GB adults (aged 18+).



# Group Flights

Conducted by YouGov on behalf of Civil Aviation Authority

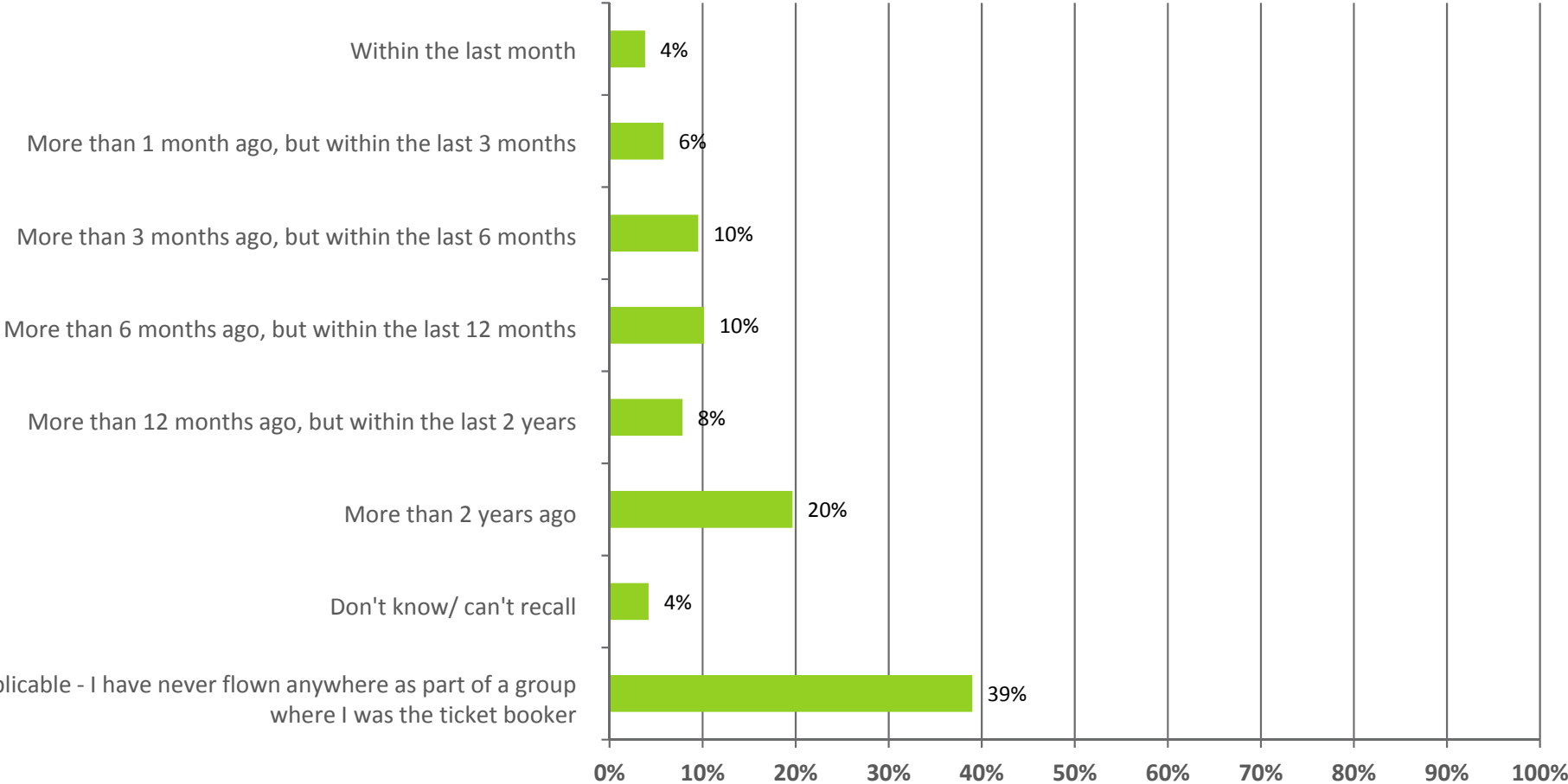
Fieldwork Dates: 28th December 2017 - 9th January 2018



# Group Flights

ACF\_Q1. For the following question, by "fly as part of a group", we mean flying anywhere (i.e. inside or out of the UK) with more than one person (e.g. with a partner, friends, family, colleagues, etc.) AND having booked the tickets together as one transaction. This can be flying for business or leisure, and includes flights booked within package holidays or on their own.

When, if ever, did you LAST fly anywhere as part of a group where you personally booked the tickets? (Please select the option that best applies. If you are unsure, please give your best estimate)



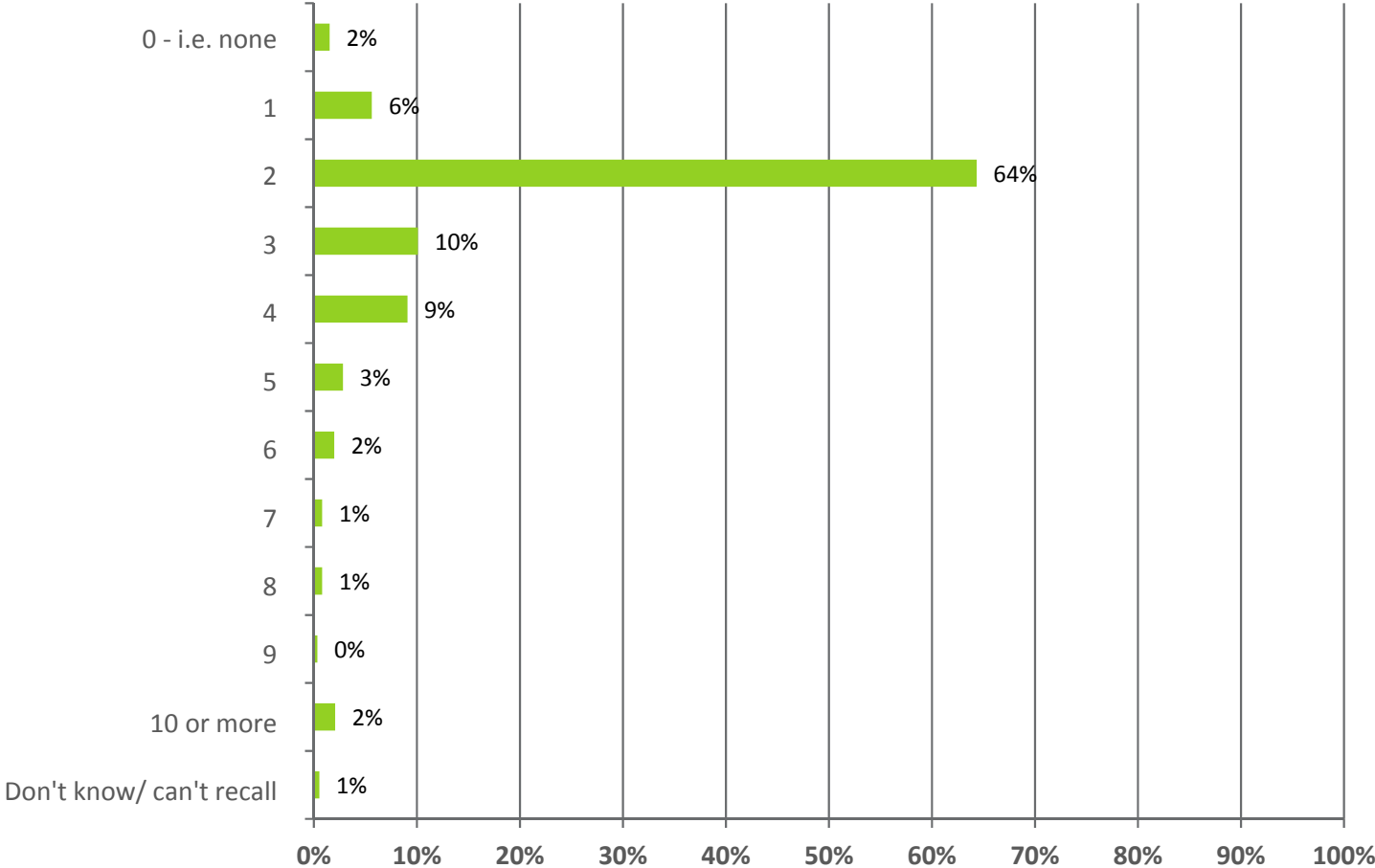
Base: All GB adults (14716)



# Group Flights

ACF\_Q2\_4. For the following questions, if you have flown as part of a group where you booked the tickets on more than one occasion in the last year, please think about the MOST recent time.

Including yourself, how many, if any, of each of the following types of people were in the group that you booked for? (Please select one option in each column)  
- Adult(s) aged 17 years or older



Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year (4296)

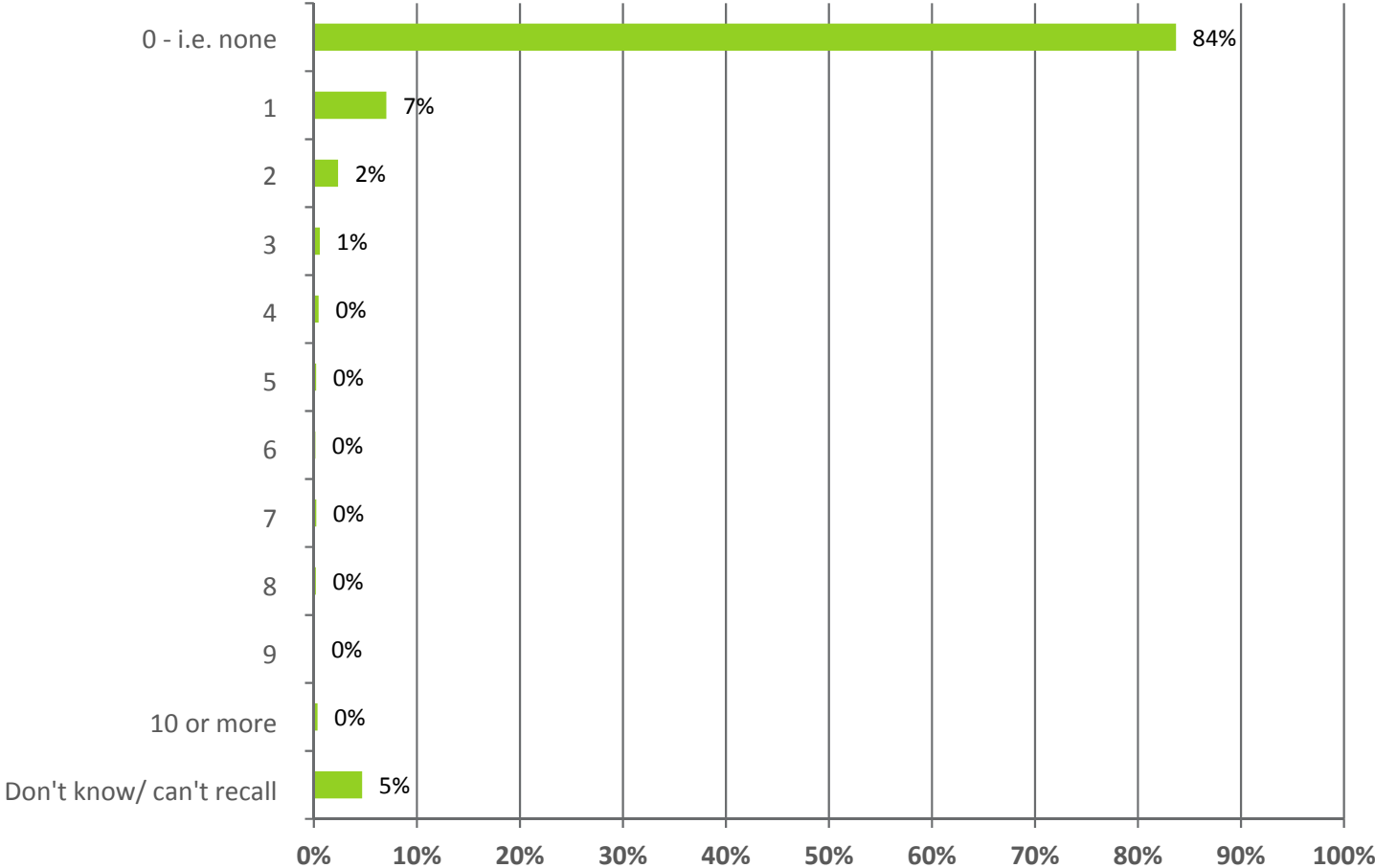




# Group Flights

ACF\_Q2\_3. For the following questions, if you have flown as part of a group where you booked the tickets on more than one occasion in the last year, please think about the MOST recent time.

Including yourself, how many, if any, of each of the following types of people were in the group that you booked for? (Please select one option in each column)  
- Child(ren) aged 13 to 16 years old



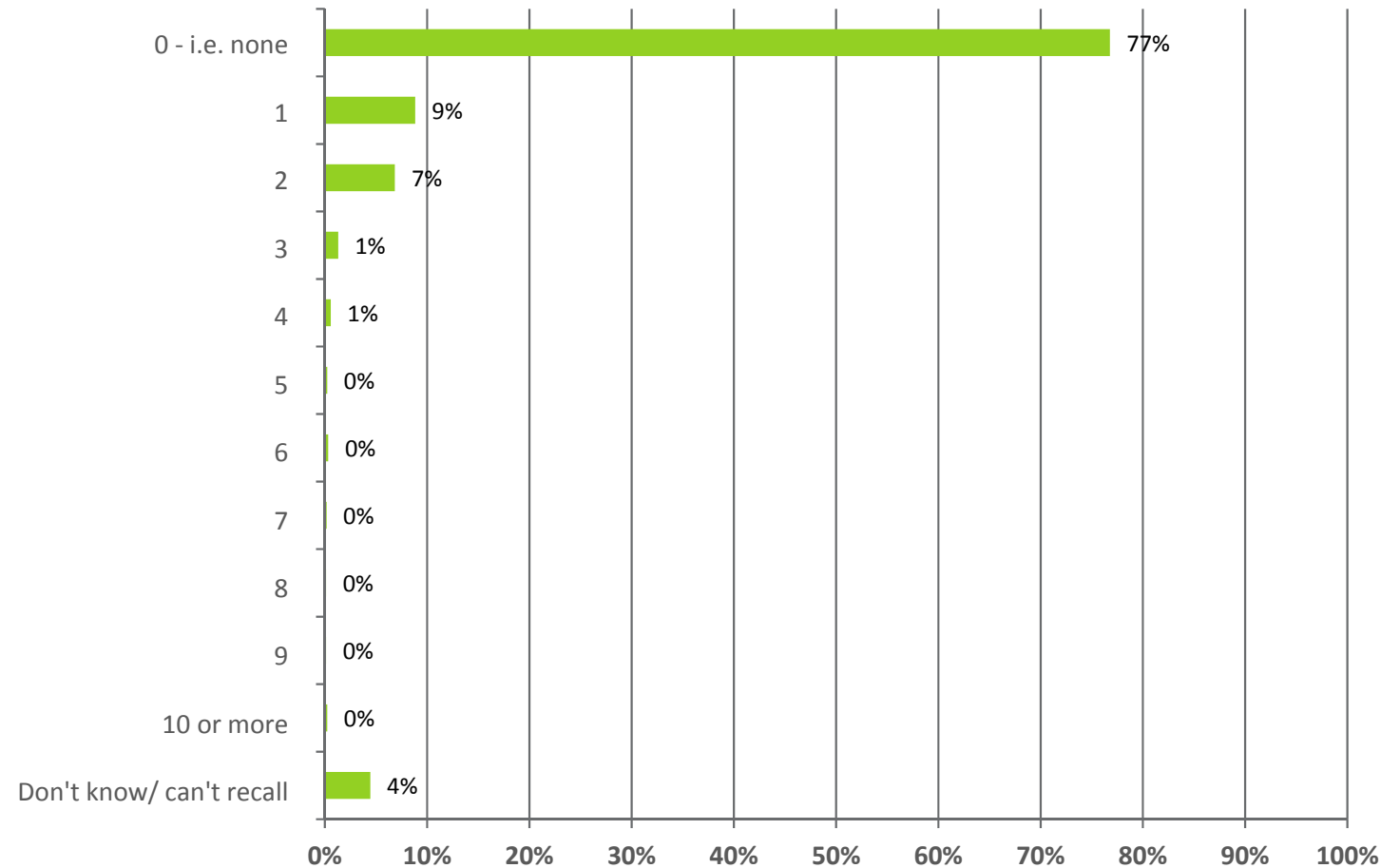
Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year (4296)



# Group Flights

ACF\_Q2\_2. For the following questions, if you have flown as part of a group where you booked the tickets on more than one occasion in the last year, please think about the MOST recent time.

Including yourself, how many, if any, of each of the following types of people were in the group that you booked for? (Please select one option in each column)  
- Child(ren) aged 2 to 12 years old



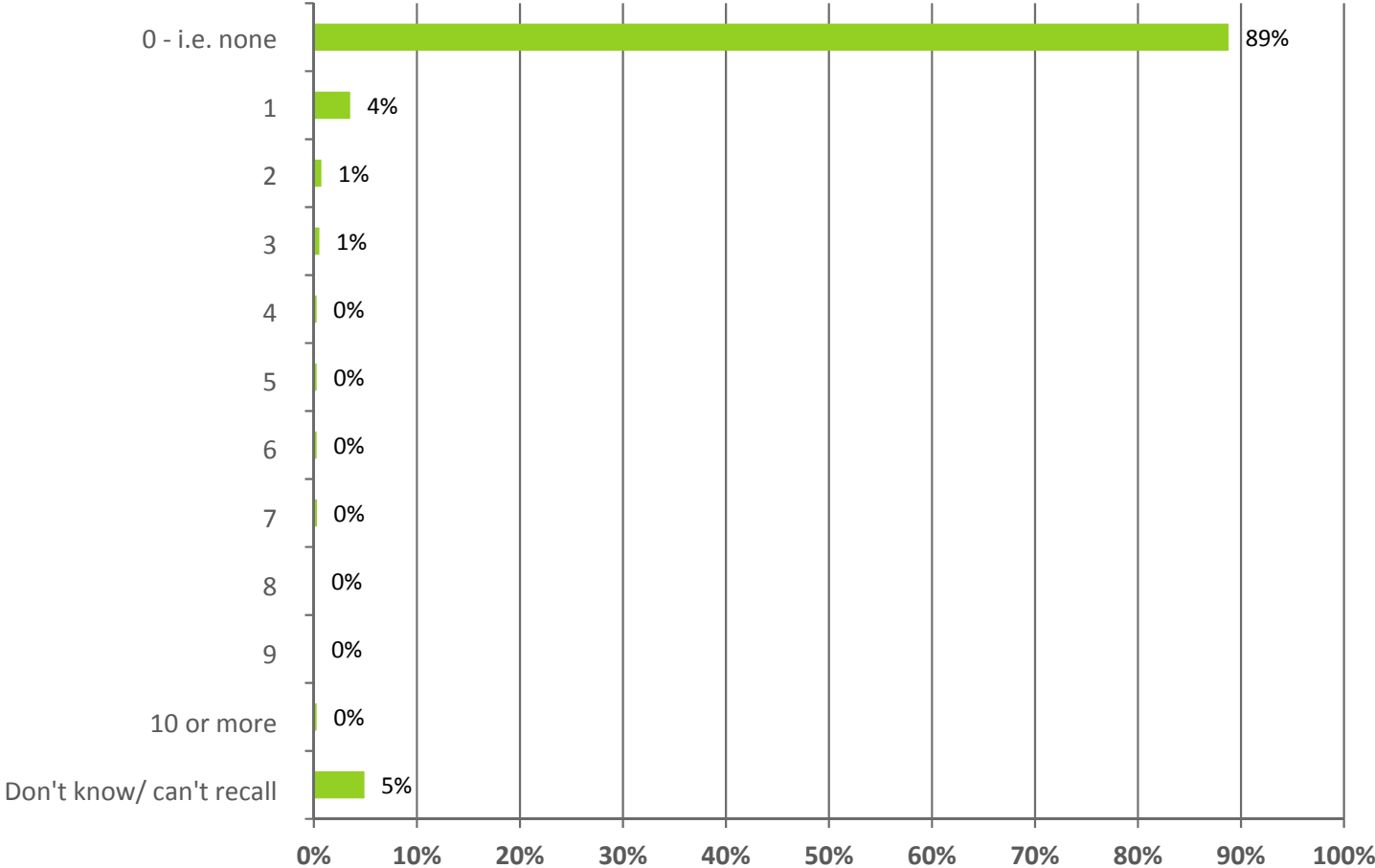
Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year (4296)



# Group Flights

ACF\_Q2\_1. For the following questions, if you have flown as part of a group where you booked the tickets on more than one occasion in the last year, please think about the MOST recent time.

Including yourself, how many, if any, of each of the following types of people were in the group that you booked for? (Please select one option in each column)  
- Infant(s) aged 2 or under



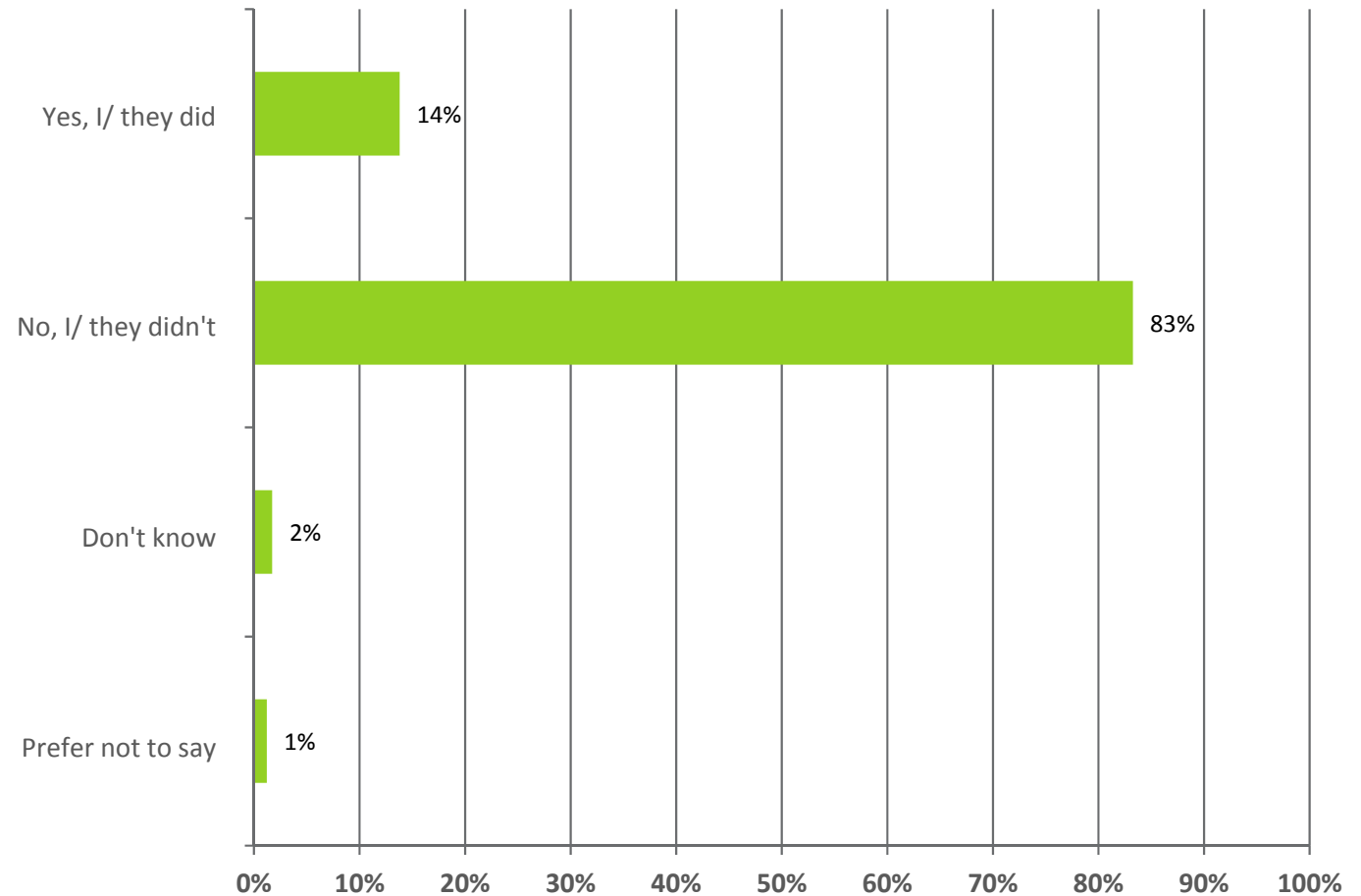
Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year (4296)



# Group Flights

ACF\_Q2b. For the following question, by "disability, health or medical condition", we mean physical conditions affecting movement, balance, vision or hearing, or non-physical disabilities or health conditions (e.g. affecting thinking, remembering, learning, communications, mental health or social relationships). It could also include temporary conditions that could be impacted by air travel, such as pregnancy or injury.

Did yourself or anyone else in the group booking have a disability, health or medical condition that would have an impact on travelling?

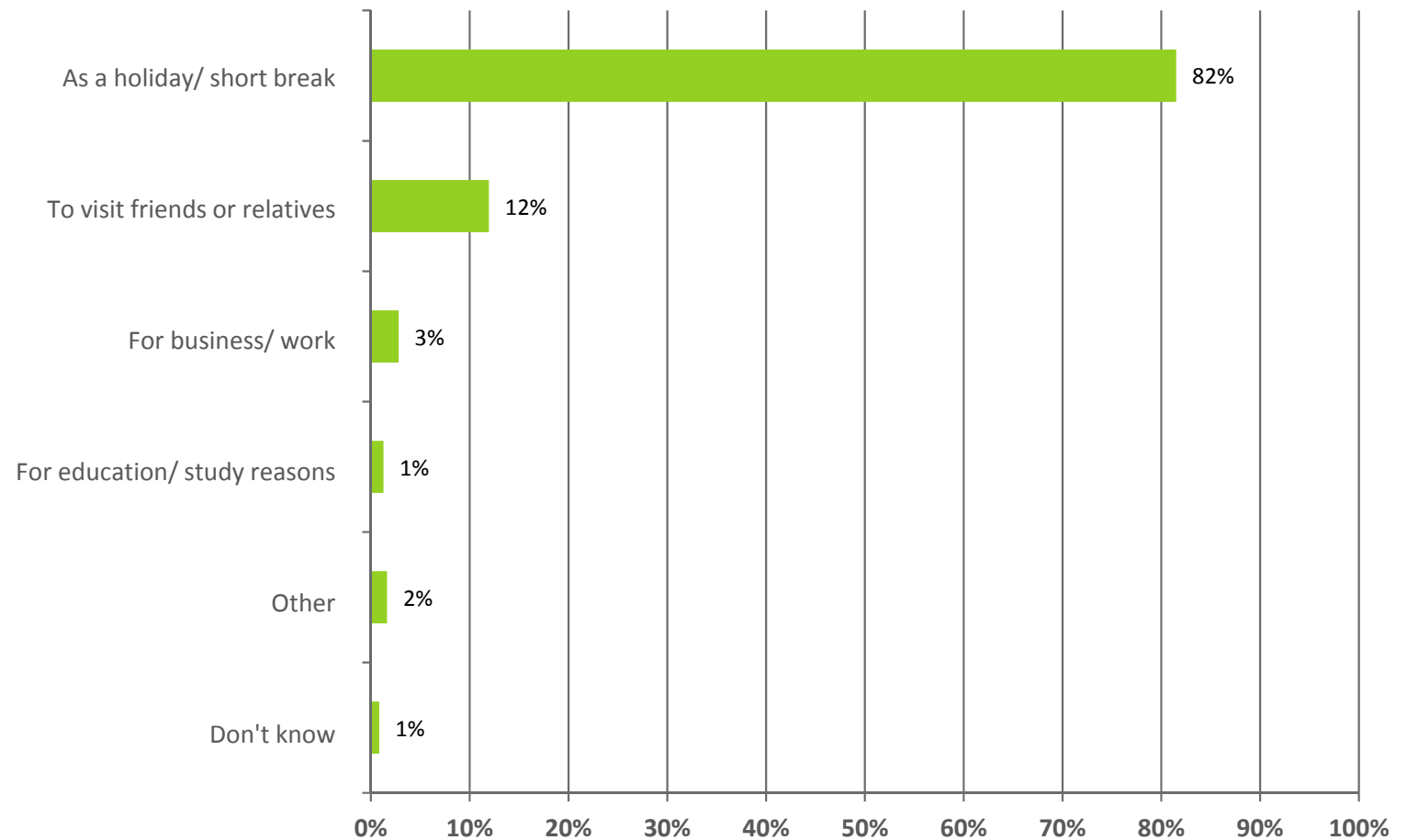


Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year (4296)

# Group Flights

ACF\_Q3. Still thinking about the MOST recent time you flew as part of a group where you booked the tickets...

Which ONE, if any, of the following BEST describes the reason for the travel? (If your answer doesn't appear in the list, please type it in the "Other" box)

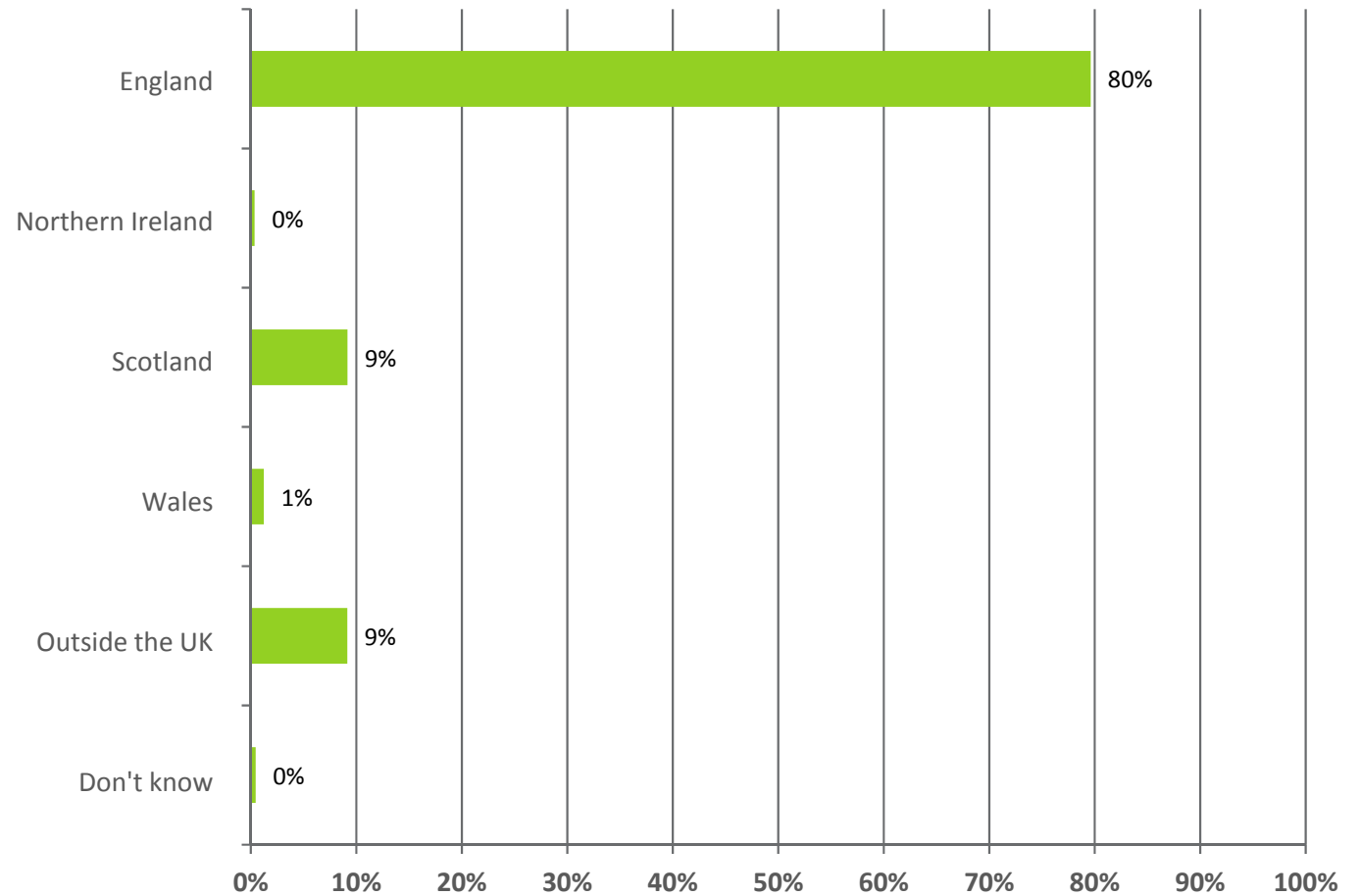


Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year (4296)

# Group Flights

ACF\_Q4a. Still thinking about the MOST recent time you flew as part of a group where you were the ticket booker. If you booked tickets for a return trip please think about the first flight you took (i.e. the outbound flight).

From which ONE of the following places did your flight depart from?

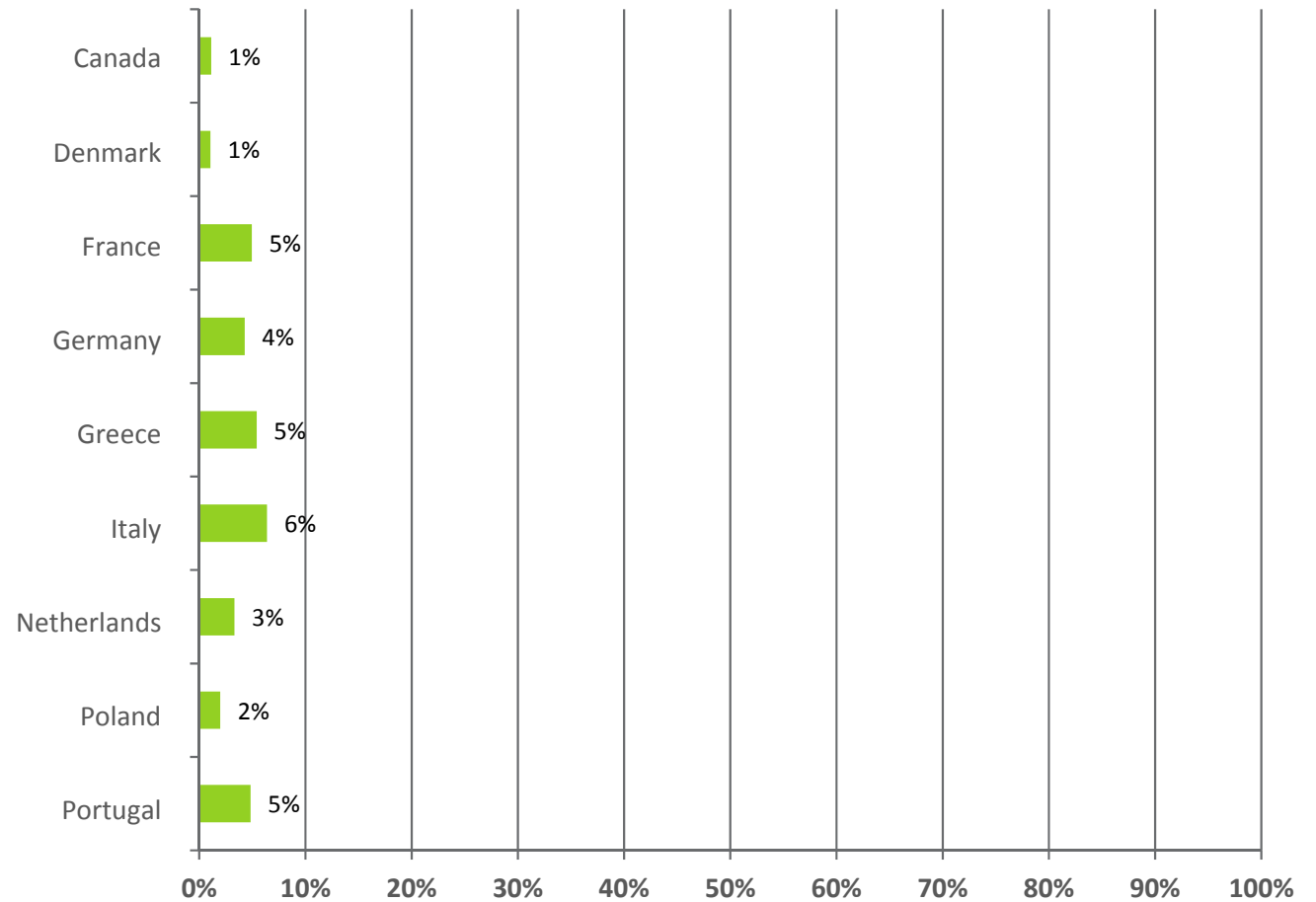


Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year (4296)



# Group Flights

ACF\_Q4b. Which ONE, if any, of the following countries/ places did you fly to (i.e. the final destination of the outbound flight)? (If your answer doesn't appear in the list, please type it in the "Other" box)

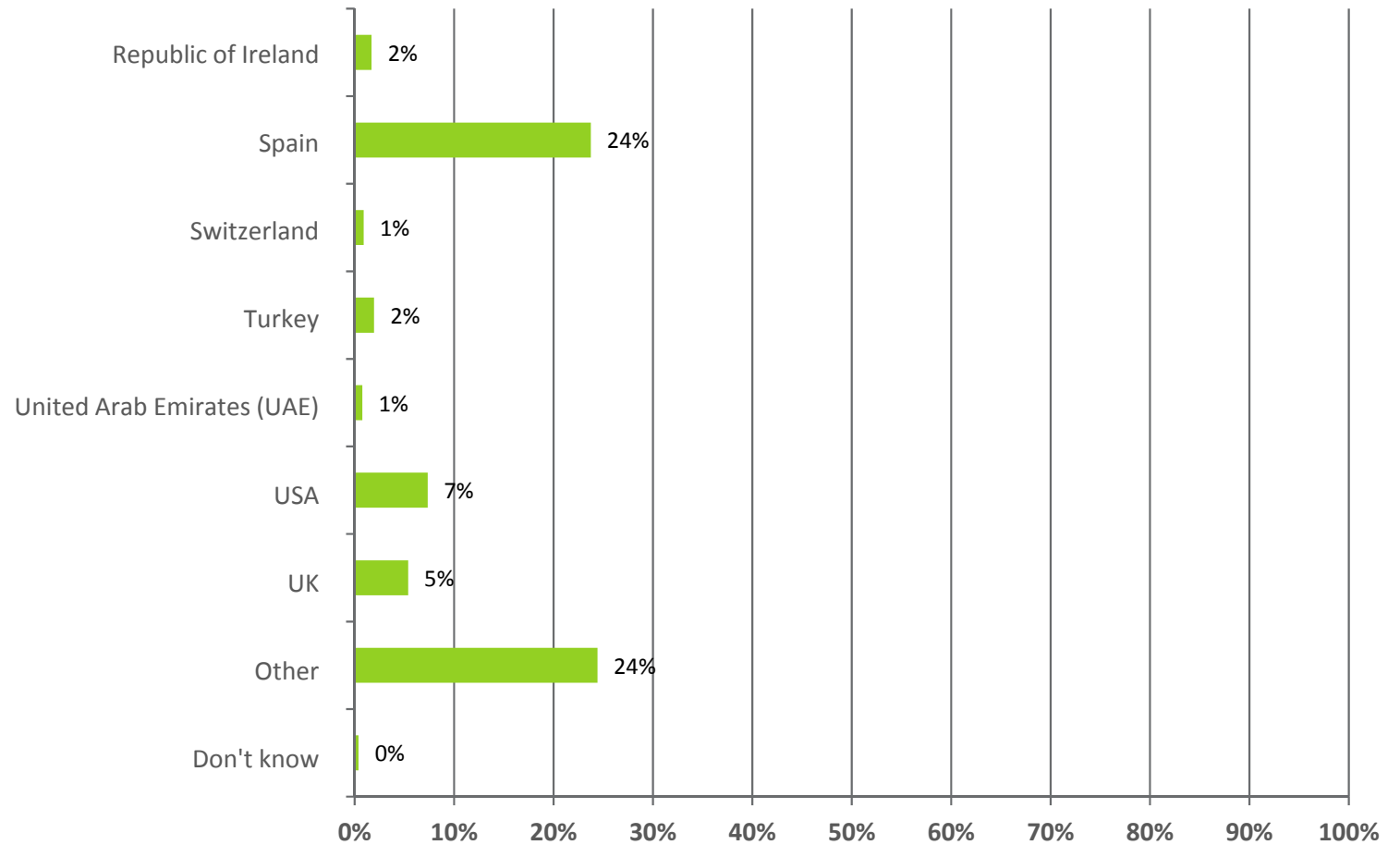


Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year (4296)



# Group Flights

ACF\_Q4b. Which ONE, if any, of the following countries/ places did you fly to (i.e. the final destination of the outbound flight)? (If your answer doesn't appear in the list, please type it in the "Other" box) (continued 2)



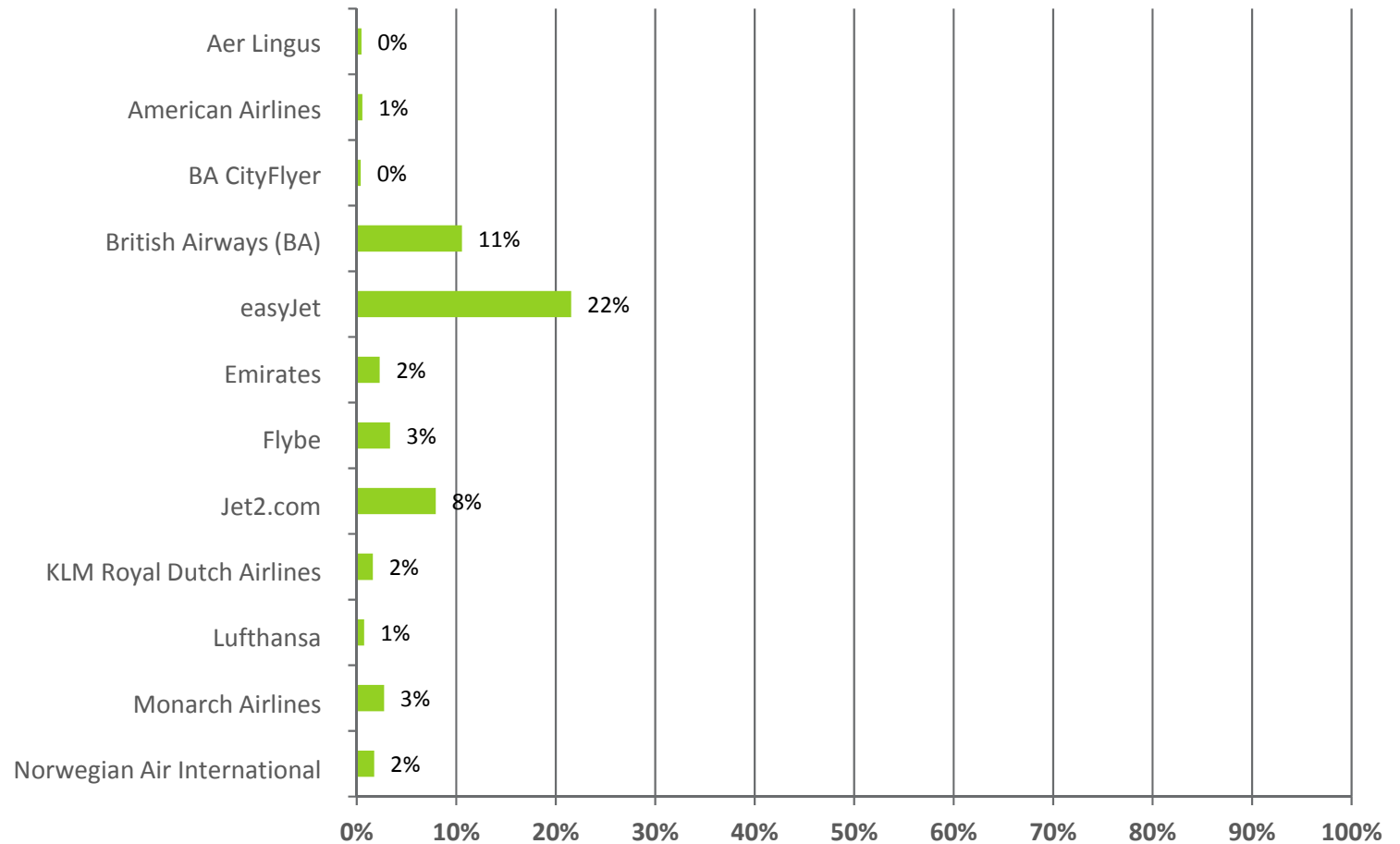
Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year (4296)





# Group Flights

ACF\_Q4c. For the following question, if you flew with more than one airline on the outbound journey, please think about the airline you flew with FIRST. Which ONE, if any, of the following airlines did you fly with? (If your answer doesn't appear in the list, please type it in the "Other" box)

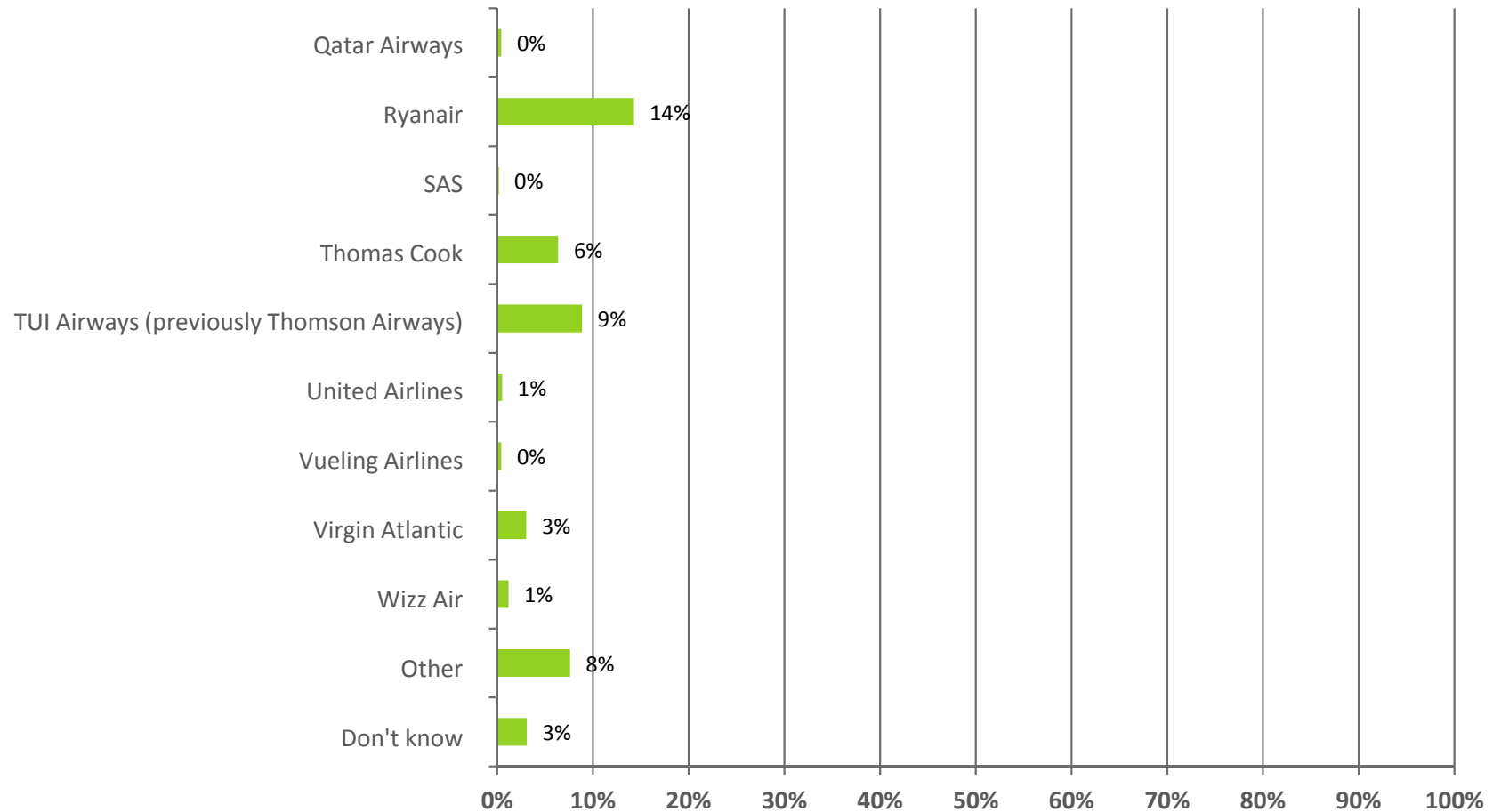


Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year (4296)



# Group Flights

ACF\_Q4c. For the following question, if you flew with more than one airline on the outbound journey, please think about the airline you flew with FIRST. Which ONE, if any, of the following airlines did you fly with? (If your answer doesn't appear in the list, please type it in the "Other" box) (continued 2)

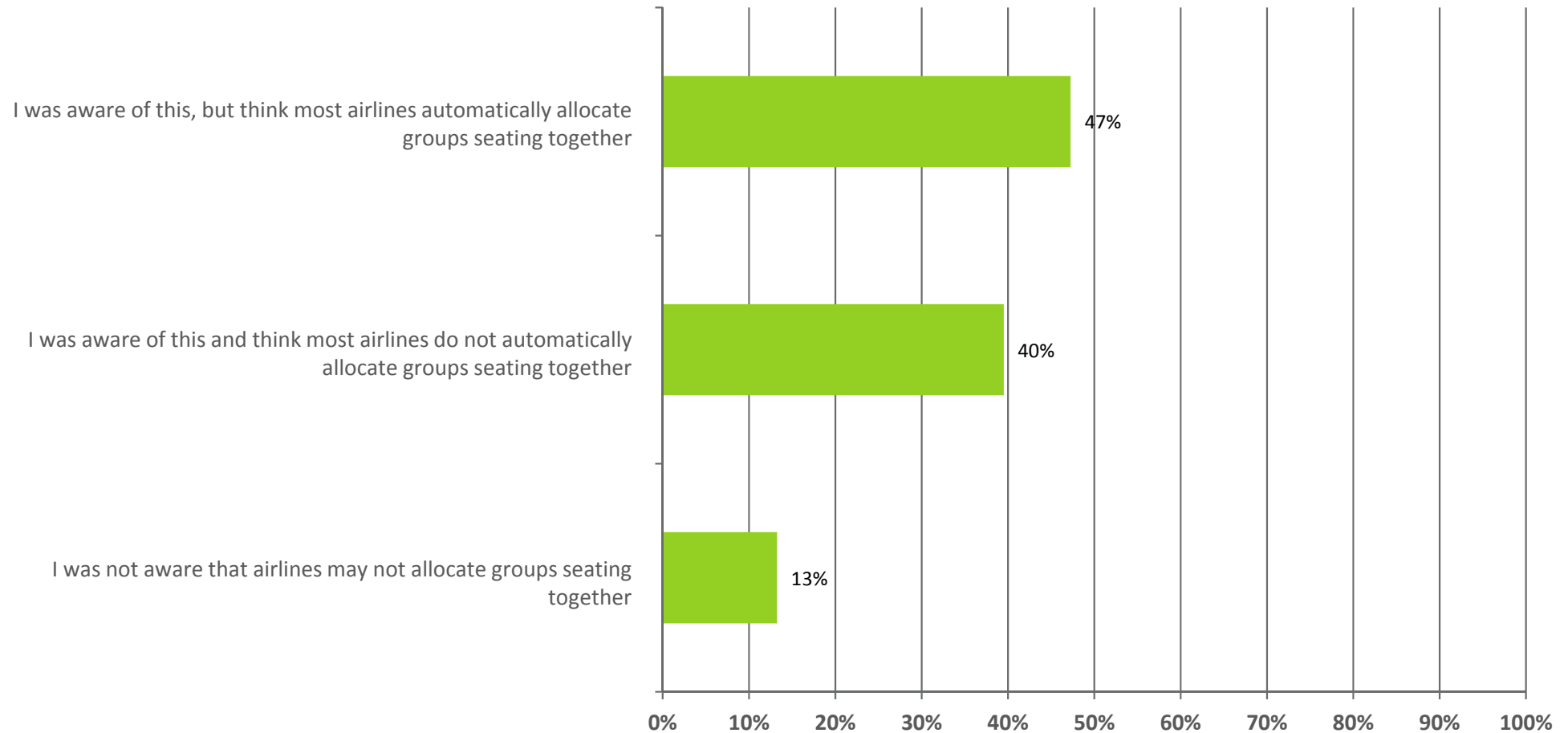


Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year (4296)



# Group Flights

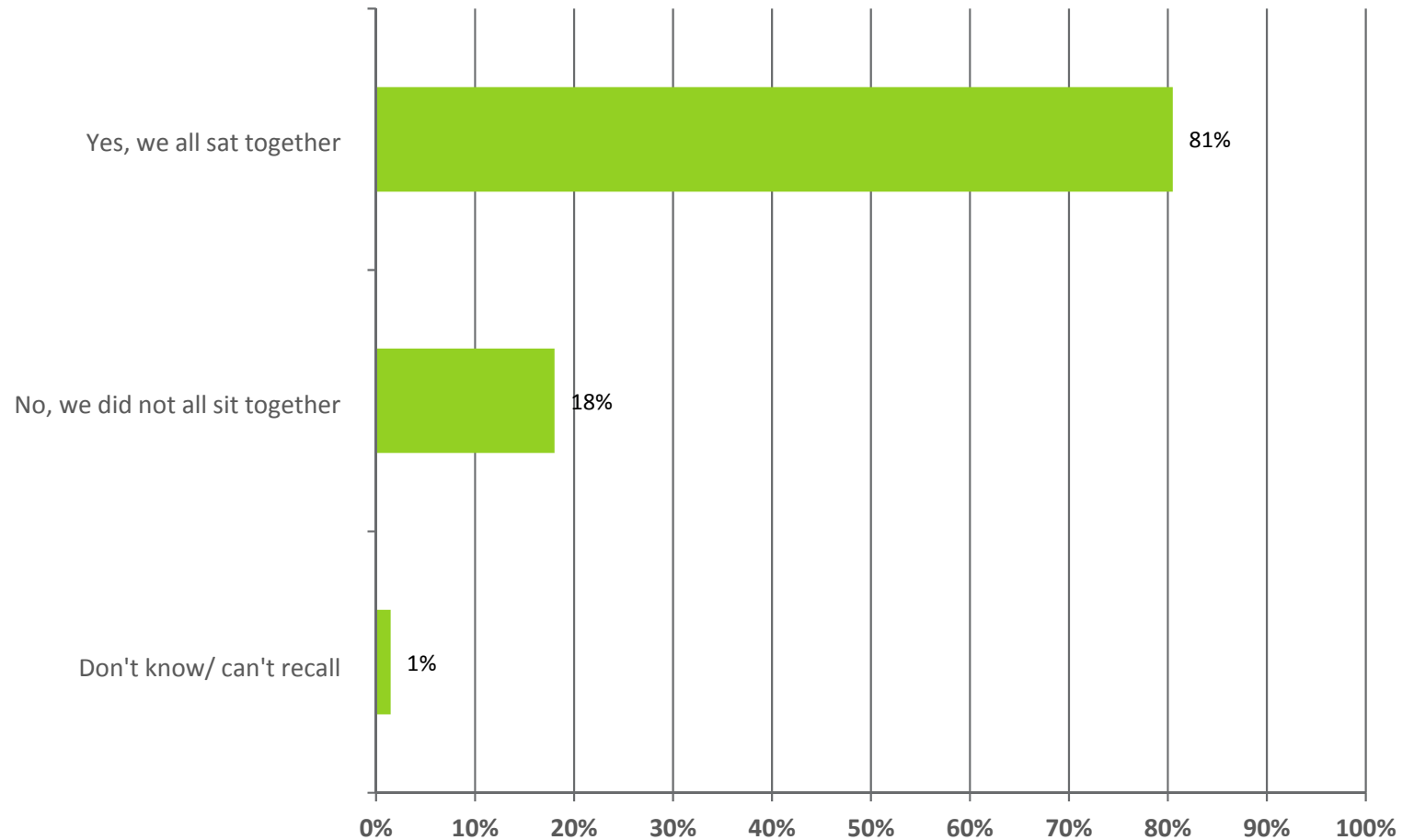
*ACF\_Q5. When people book flight tickets for groups of people all within one transaction the airline may not automatically allocate the seats together, so people in the group may have to sit separately on the flight.  
Before taking this survey, which ONE of the following statements best applies to you?*



Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year (4296)

# Group Flights

ACF\_Q6. For the following questions, please continue to think about the MOST recent time you flew as part of a group where you booked the tickets. If you booked tickets for a return trip please think about the FIRST flight you took (i.e. the outbound flight).  
Did the whole group you were with sit together on the flight?

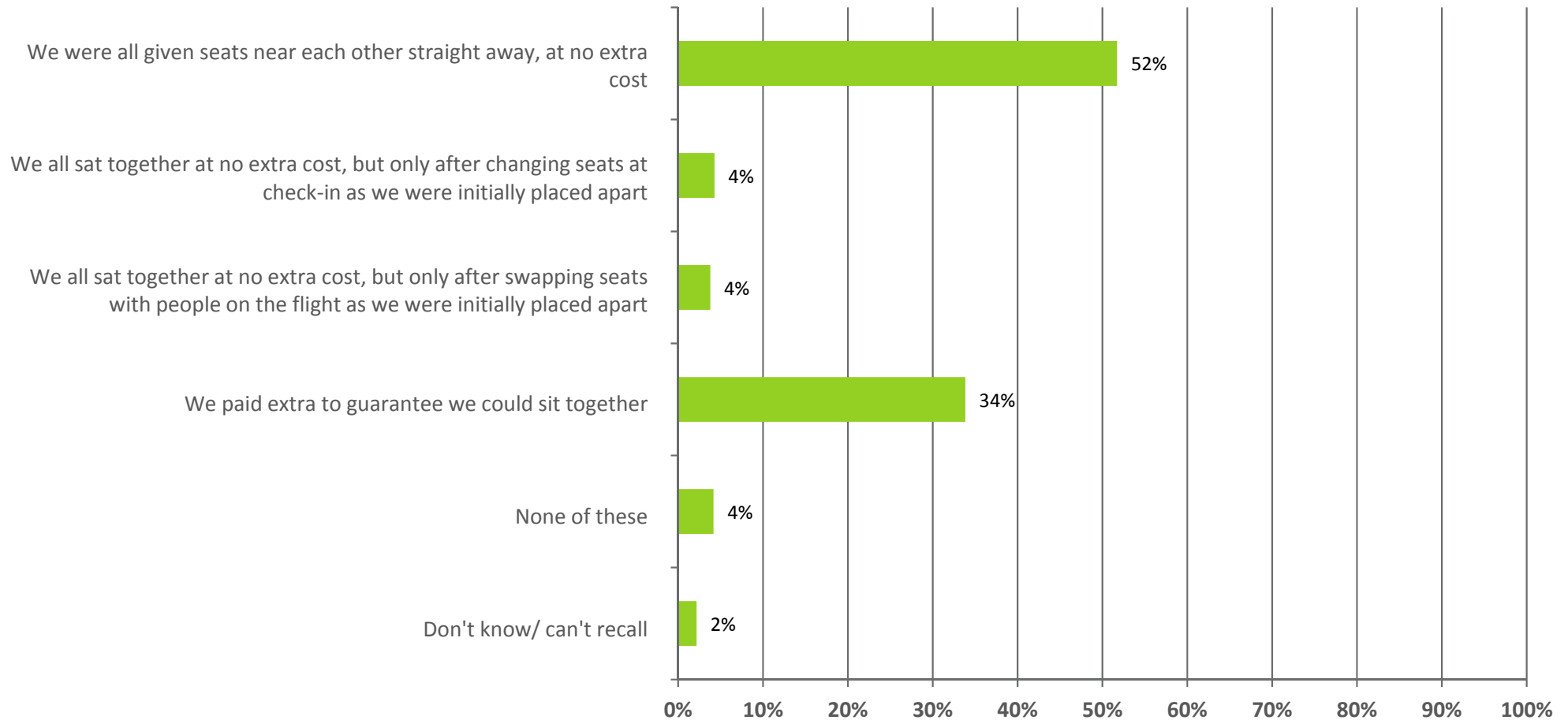


Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year (4296)



# Group Flights

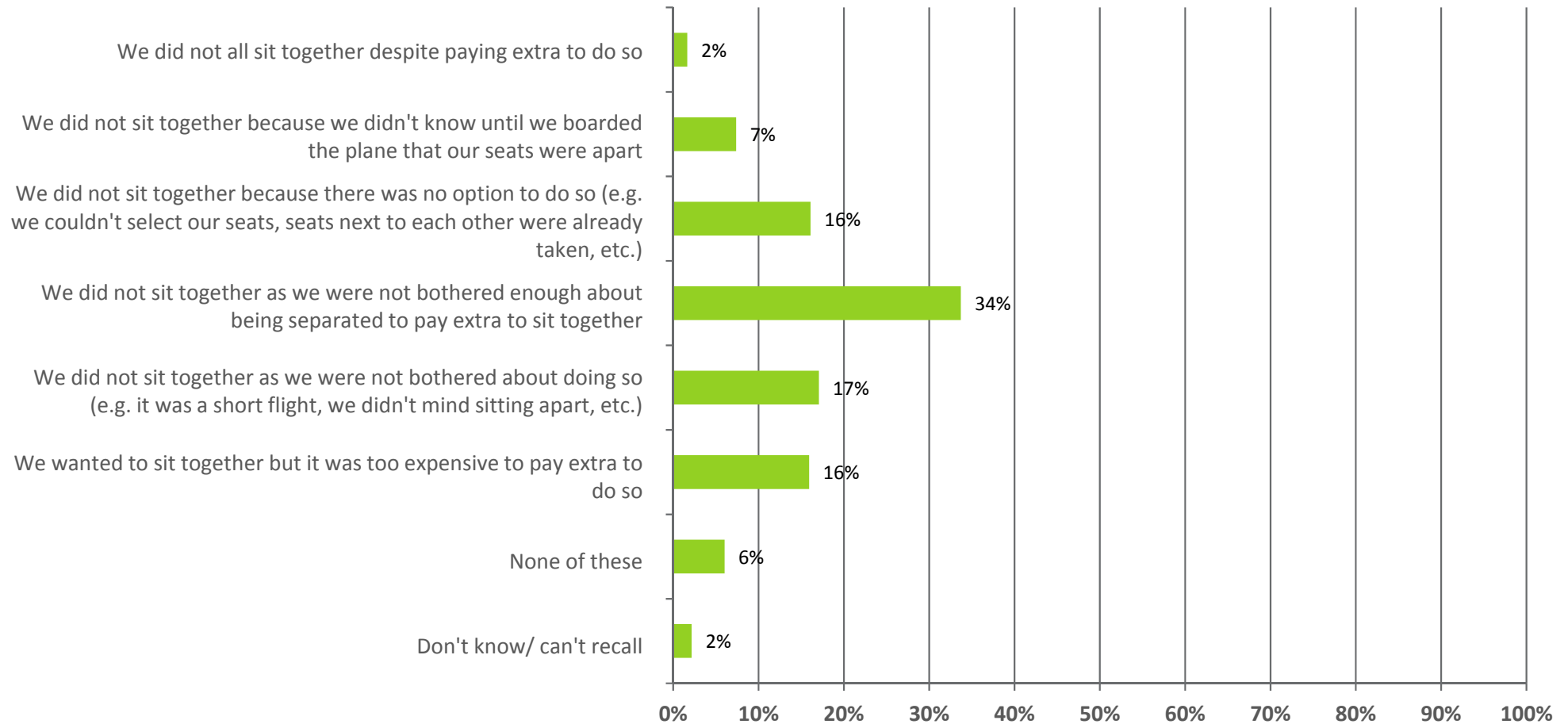
ACF\_Q7. You said you sat together as a group on the flight...  
Which ONE of the following BEST describes how you were able to sit together?



Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year, and sat together on the flight (3469)

# Group Flights

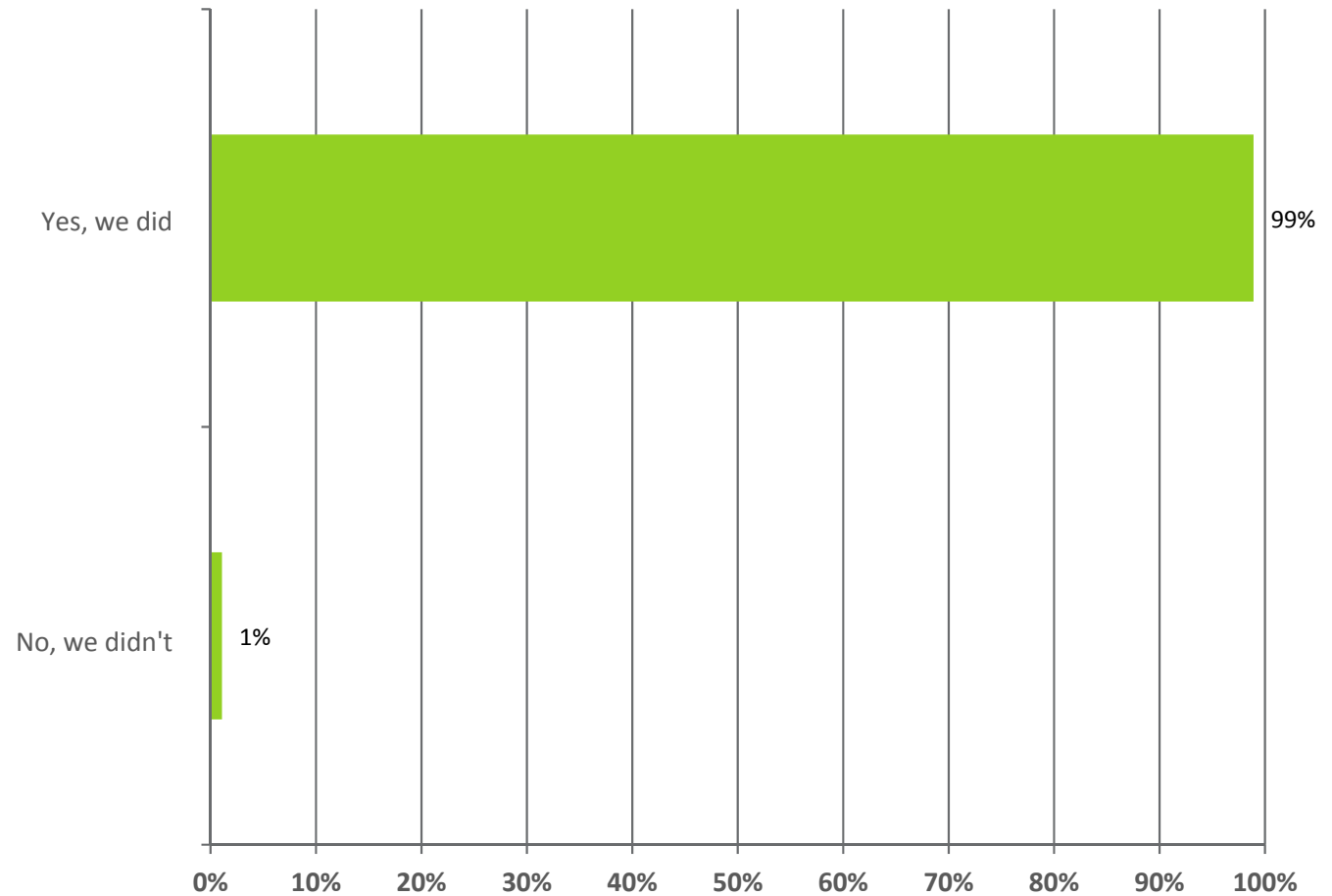
ACF\_Q8. You said you did not sit together as a group on the flight...  
Which ONE of the following BEST describes why you didn't sit together?



Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year, and did not sit together on the flight (769)

# Group Flights

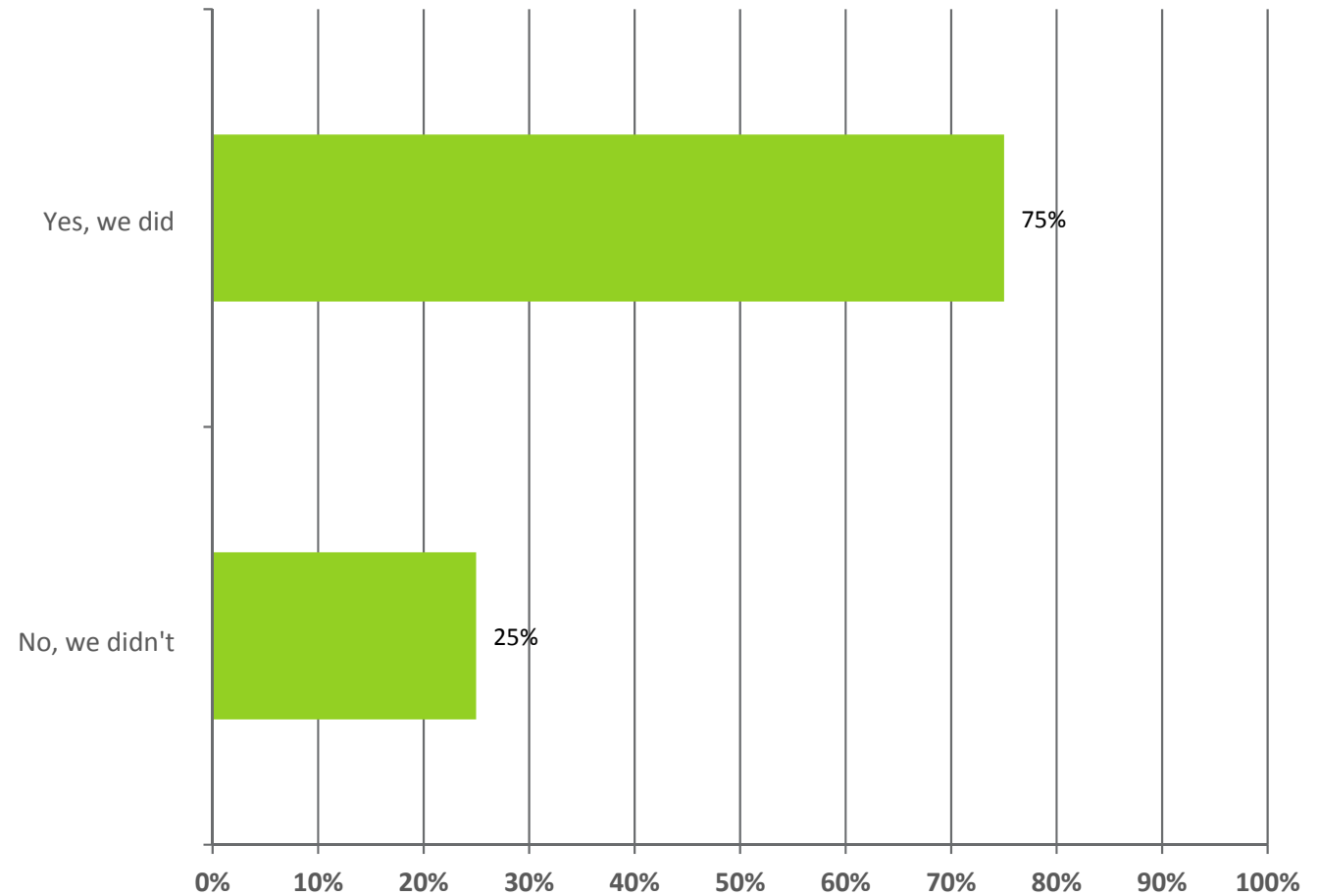
Q15a. You said you paid extra to guarantee seats next to each other on the most recent time you flew as part of a group where you booked the tickets...  
Did you get to sit together in the end?



Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year, and paid extra to guarantee seats together (1224)

# Group Flights

Q15b\_rc. You did not pay extra to guarantee seats next to each other on the most recent time you flew as part of a group where you booked the tickets... Did you get to sit together in the end? (recoded)



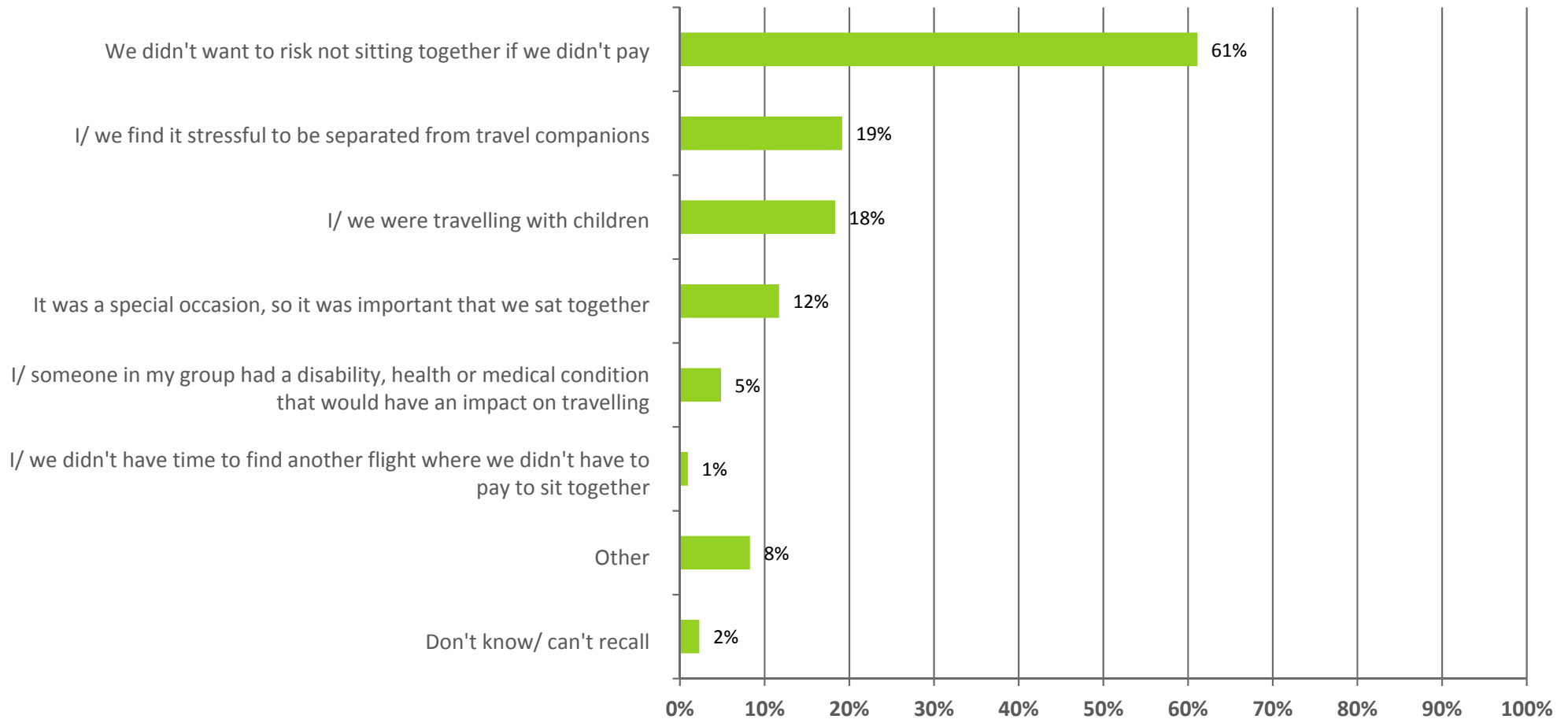
Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year, and did not pay extra to guarantee seats together (3014)



# Group Flights

ACF\_Q11. You said you had paid extra to guarantee your group would sit together...

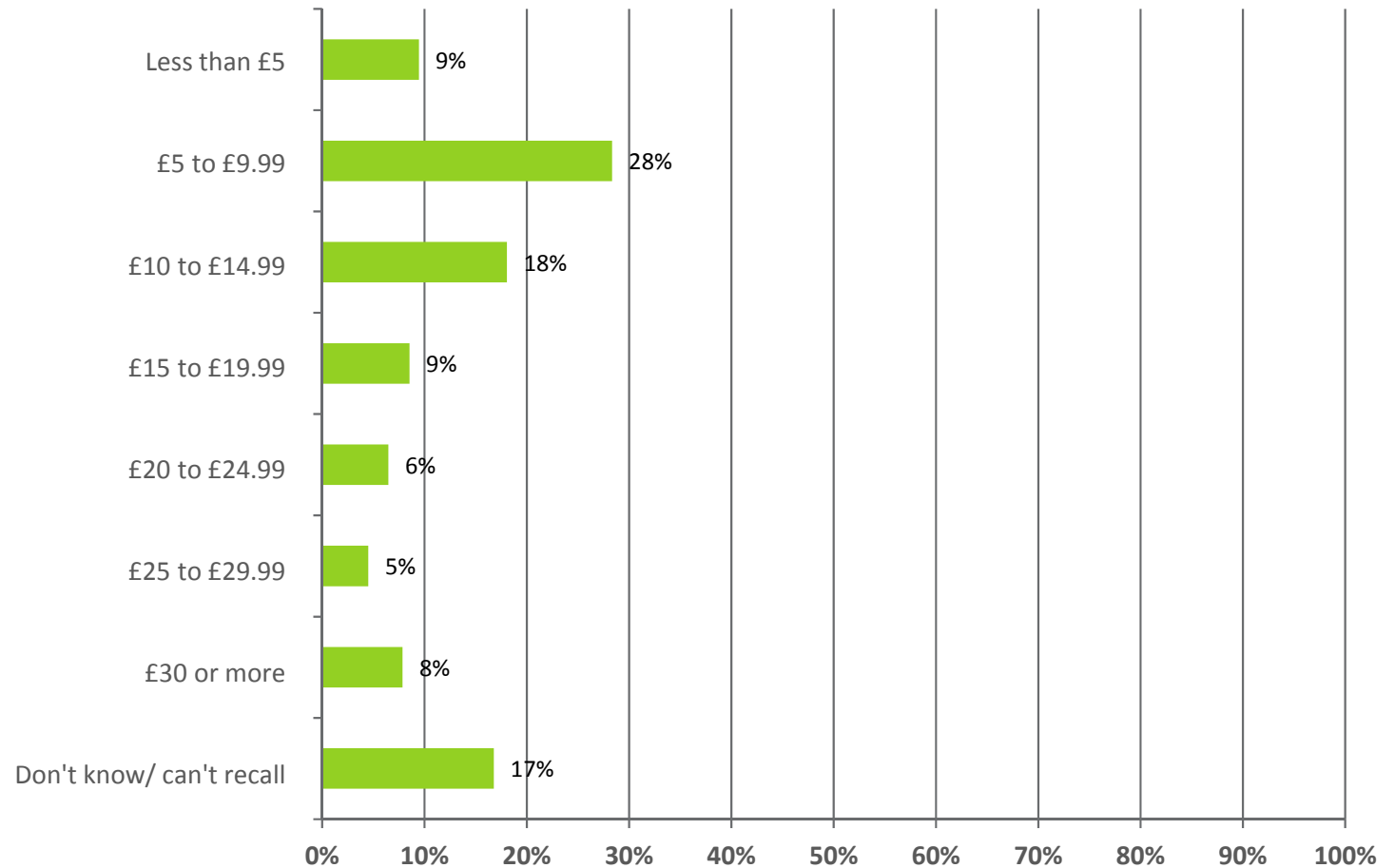
Which, if any, of the following are reasons why you paid for this? (Please select all that apply. If your answer doesn't appear in the list, please type it in the "Other" box)



Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year, who paid extra to guarantee seats together (1224)

# Group Flights

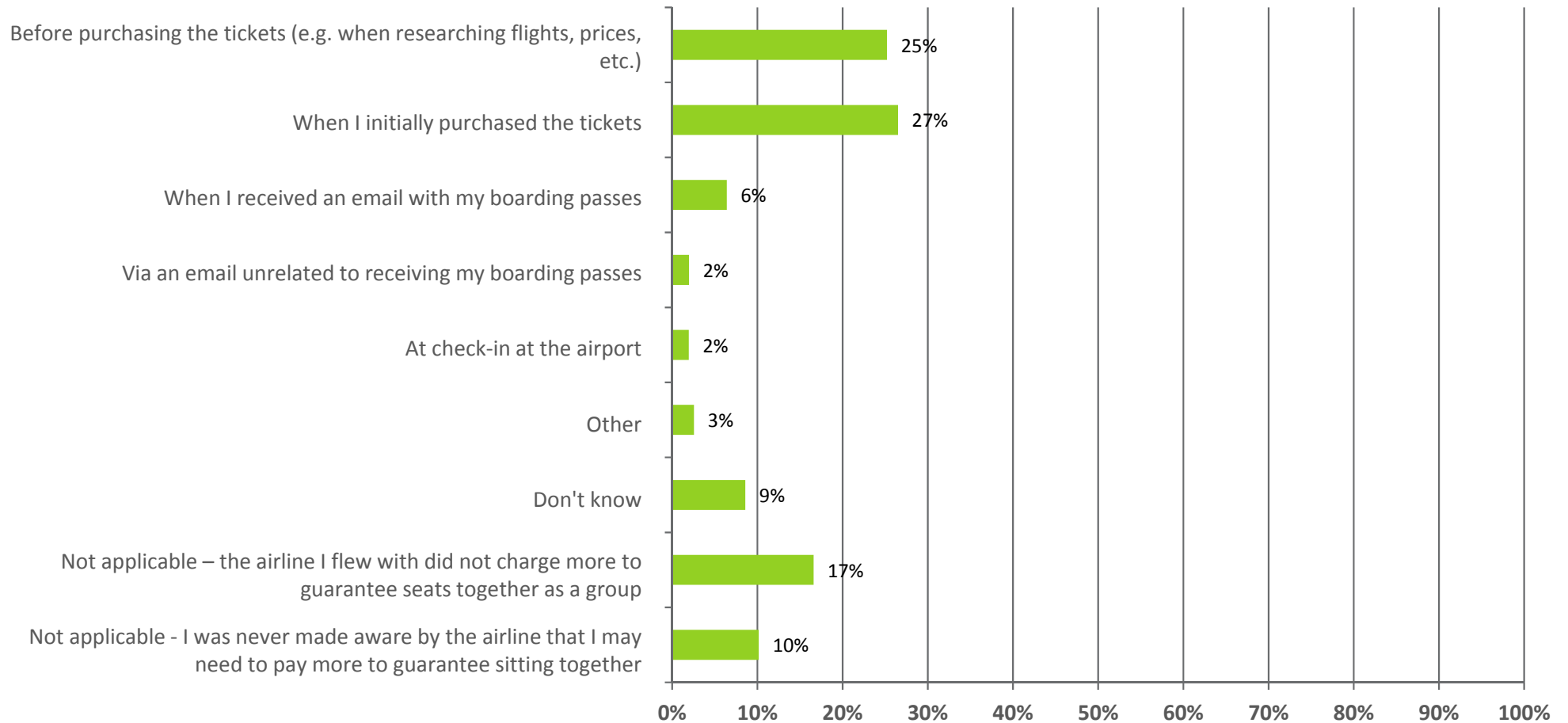
ACF\_Q10. As a reminder, if you booked tickets for a return trip please think about the **FIRST** flight you took (i.e. the outbound flight).  
Approximately how much money did you pay, per seat, to sit together? (If you are unsure, please give your best estimate)



Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year, who paid extra to guarantee seats together (1224)

# Group Flights

ACF\_Q9. At which stage were you **FIRST** made aware by the airline that you would need to pay to ensure your group could sit together? (Please select the option that best applies. If your answer doesn't appear in the list, please type it in the "Other" box)



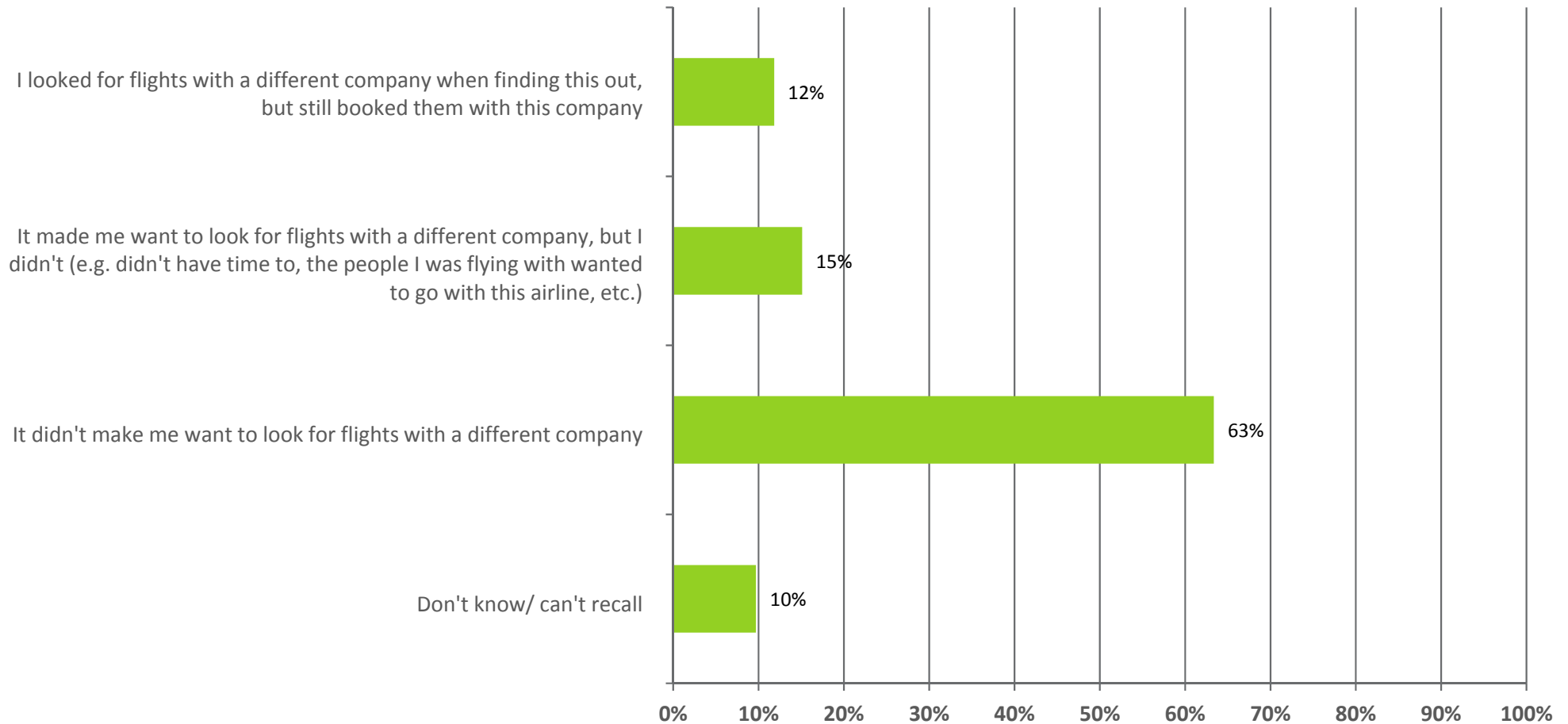
Base: All GB adults online who have flown as part of a group where they were the ticket holder in the last year (4296)



# Group Flights

ACF\_Q12. You previously said you were **FIRST** made aware before purchasing or when you initially purchased the tickets that you would need to pay more to guarantee sitting together...

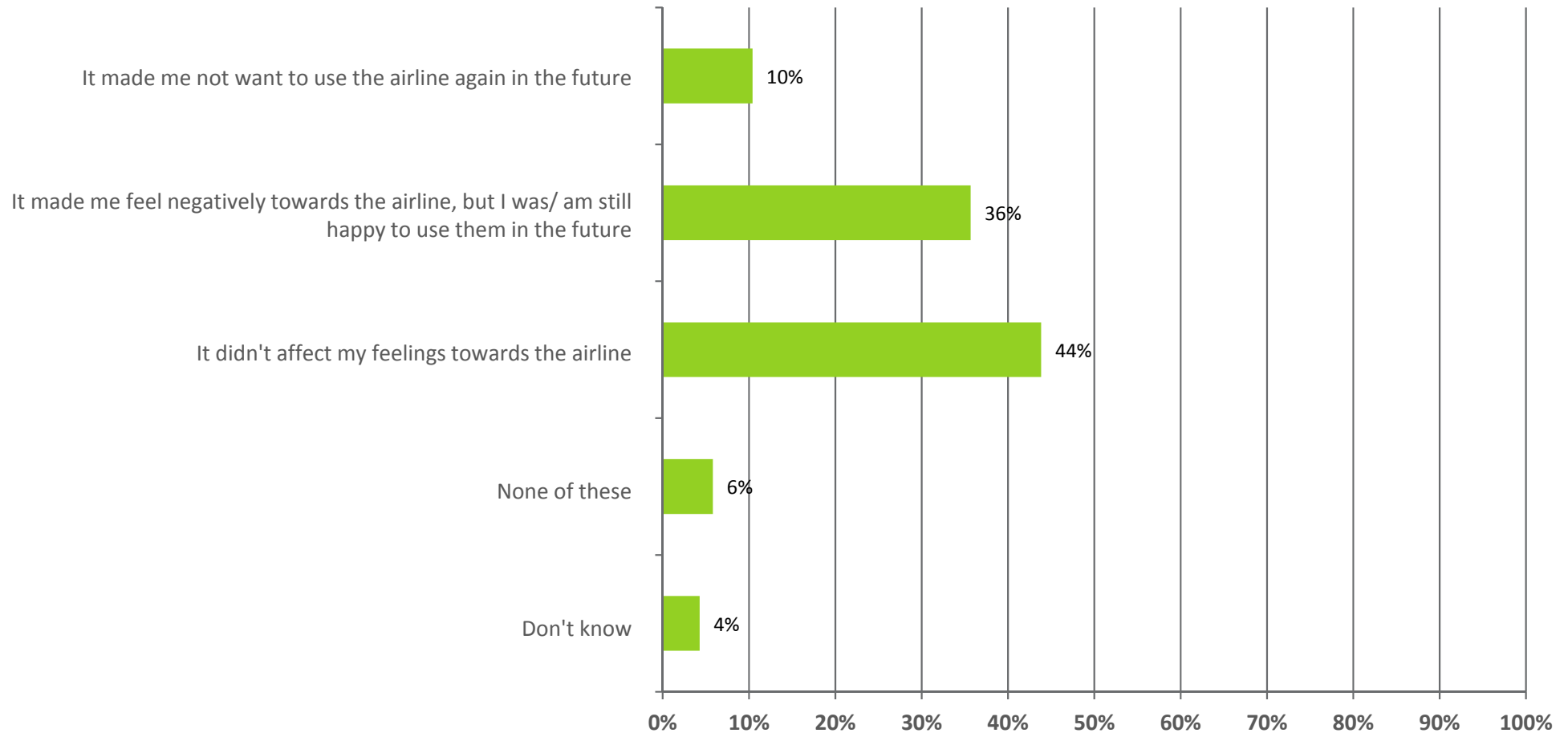
Which **ONE** of the following statements best applies to you?



Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year, who were told when initially purchasing the tickets they would need to pay more to guarantee seats together (2239)

# Group Flights

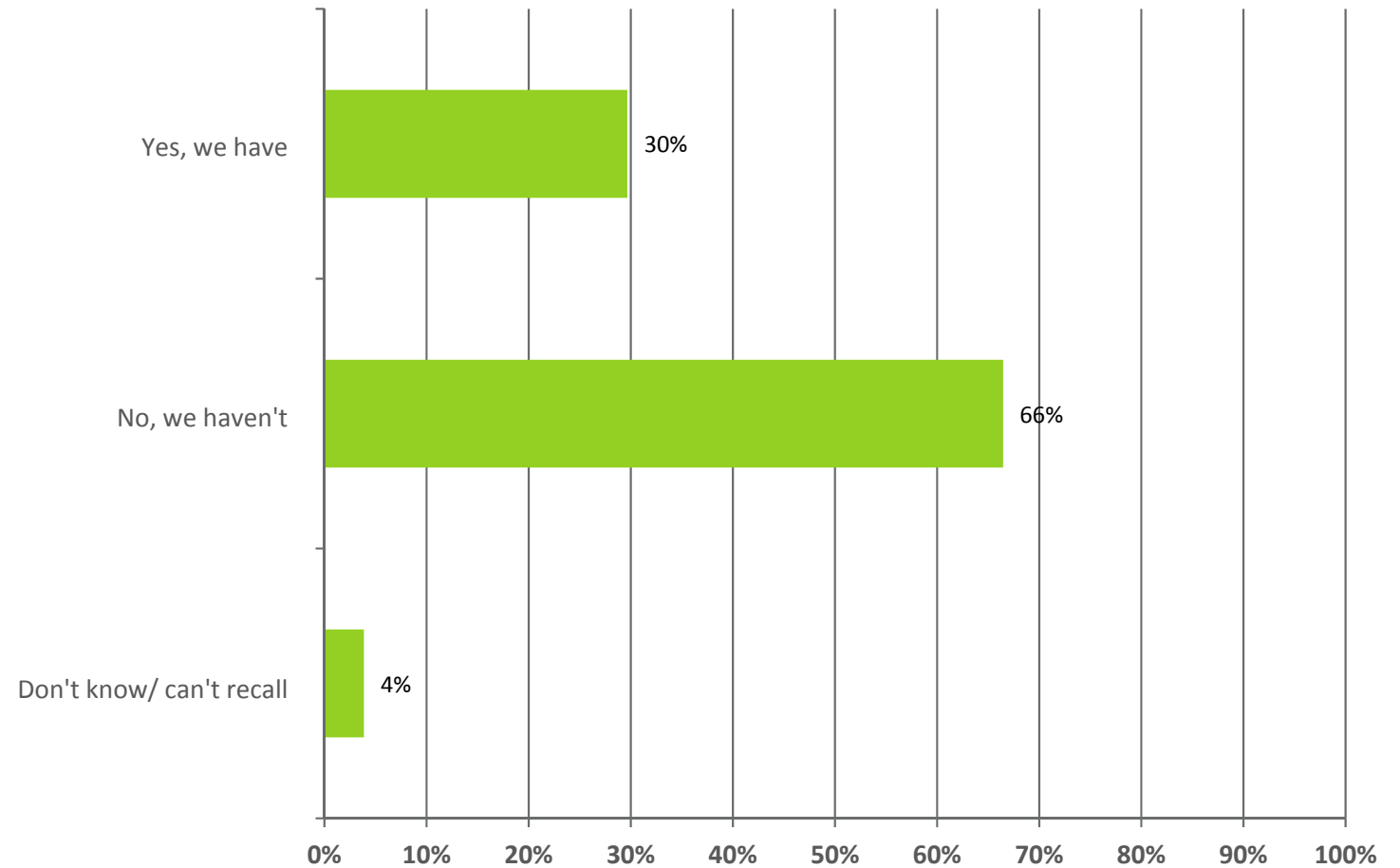
ACF\_Q12b. Thinking about when you were made aware you would need to pay more to guarantee sitting together as a group... Which ONE of the following statements BEST describes how it made you feel about the airline?



Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year, who were told they would need to pay more to guarantee seats together (3148)

# Group Flights

ACF\_Q14. For the following question, please think about ANY time you flew as part of a group where you booked the tickets in the last 12 months...  
Have your group had to sit separately on ANY of these flights?



Base: All GB adults who have flown as part of a group where they were the ticket holder in the last year (4296)



## APPENDIX B

# CAA Consumer Engagement Survey

## Introduction

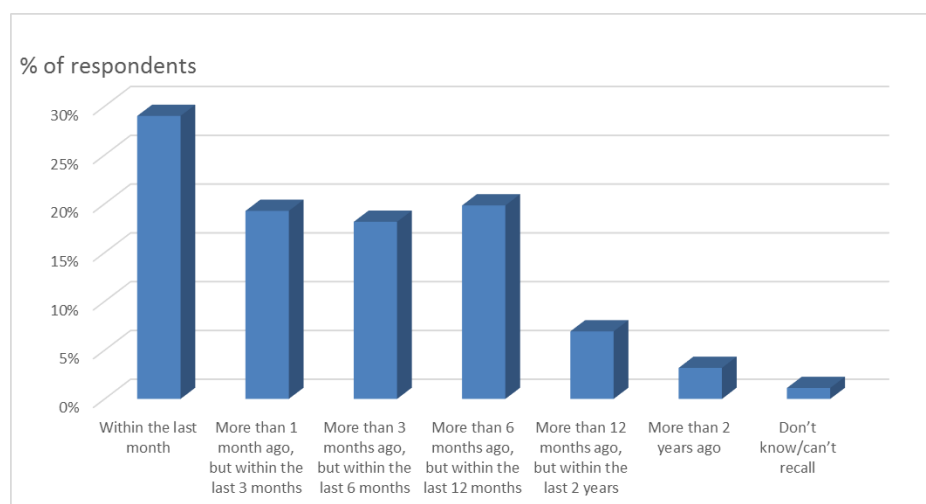
The CAA has been reviewing airline allocated seating policies. We have concerns that the current approach to allocated seating may be detrimental to consumers, and may have particular impacts on some groups of travellers, such as those with disabilities or people travelling with children. As part of our research, we opened a consumer survey from 2 February to 2 March 2018. Consumers were able to tell us about the background to their group travel, which airline they travelled with, how much they paid to sit together (if applicable), and their views on being charged to sit together. We received a total of 1,069 responses. Note that this sample is not representative of GB adults but is self-selecting, and therefore the responses should be interpreted accordingly.

## Background

### When respondents travelled

Respondents were likely to be recent fliers. Most of the survey respondents flew within the last six months (66% flew 6 months ago or less). Almost a third of respondents had flown in the last month (29%).

**Figure 1: When respondents last flew as part of a group**



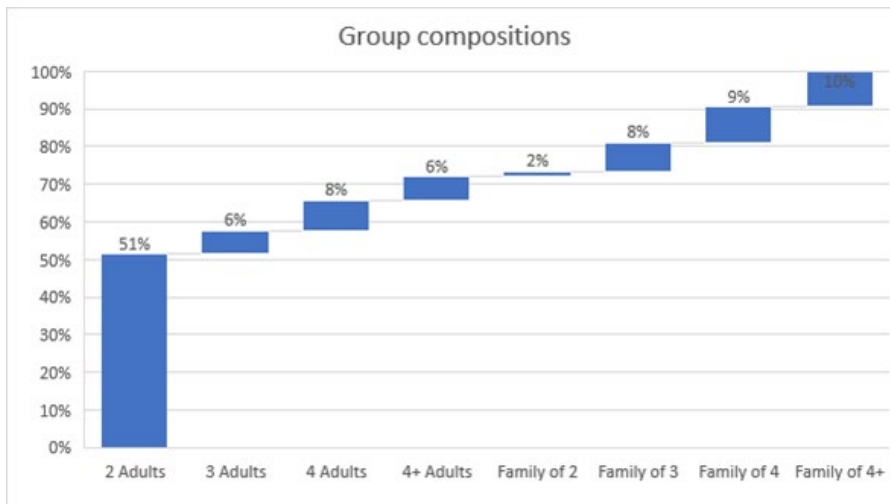
**Question:** Thinking about the occasion when you flew anywhere as part of a group that booked tickets together, please tell us when this occasion happened. If you are unsure, please give your best estimate.

Total base: 1042

## Who was in the group

Over half of those who responded (51%) travelled as part of a couple. Almost a further third of respondents were travelling with children.

**Figure 2: Group composition**



**Question:** Including yourself, how many, if any, of each of the following types of people were in the group that you booked for?

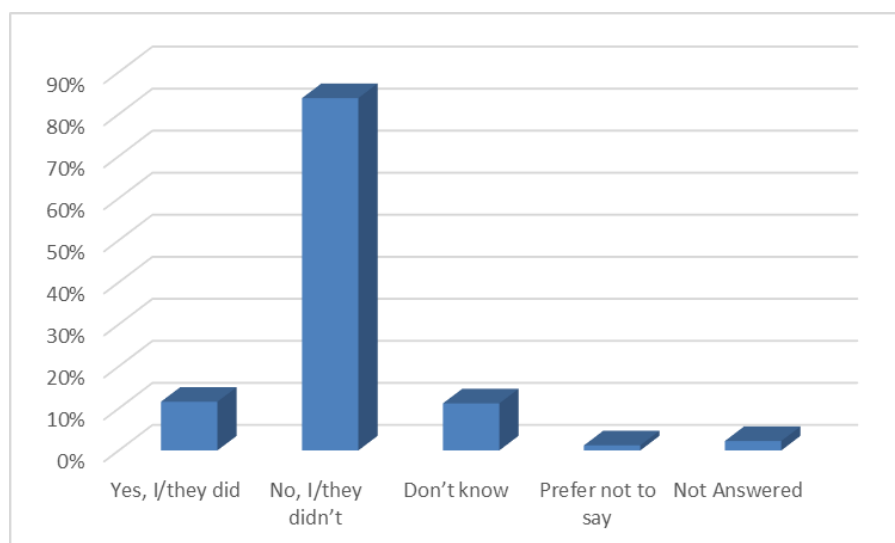
Base: 1045



## Disability or medical condition

Most respondents did not report having a disability, health or medical condition that would impact on travelling, and were not travelling with anybody who did. However, 11% of respondents (124 respondents) told us they either had such a condition themselves or were travelling with somebody who did.

**Figure 3: Disability, health or medical condition**



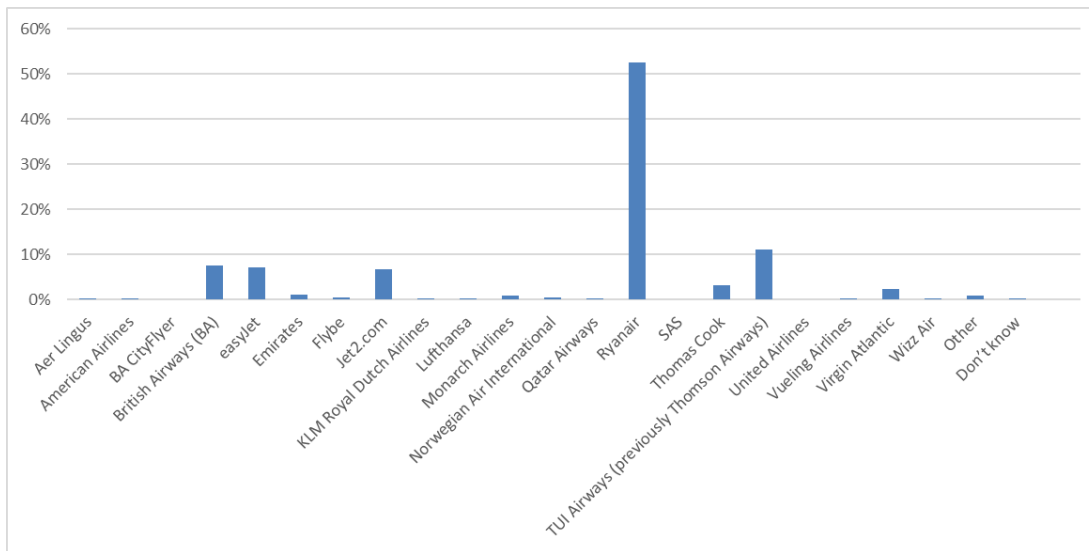
**Question:** *Did yourself or anyone else in the group booking have a disability, health or medical condition that would have an impact on travelling? By “disability, health or medical condition”, we mean physical conditions affecting movement, balance, vision or hearing, or non-physical disabilities or health conditions (e.g. affecting thinking, remembering, learning, communications, mental health or social relationships). It could also include a temporary condition that could be impacted by air travel such as pregnancy or injury.*

Base: 1045

### Which airline did respondents travel with

Over half of respondents had travelled with Ryanair (52%). 11% of respondents travelled with TUI, 7% with British Airways, 7% with easyJet and 6% with Jet2.

**Figure 4: Airline**



**Question:** Which one, if any, of the following airlines was your flight with? If your answer doesn't appear in the list, please type it in the "other" box.

Base: 1037

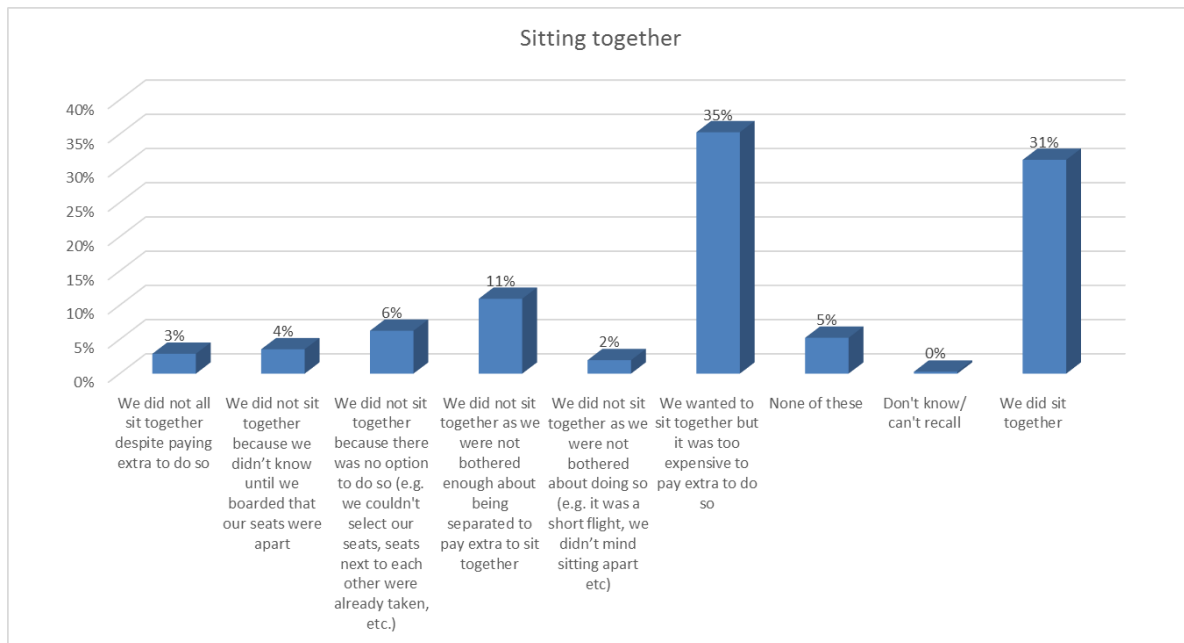
## Did respondents end up sitting together?

Approximately a third 31% (334 respondents) said they did sit together. This was either because they paid to sit together, because the airline seated them together without extra charges, or because they moved at check-in or on the plane.

More than a third (35%) said they wanted to sit together but it was too expensive to pay extra to do so.

Just over one in 10 (11%) said they didn't sit together as they were not sufficiently bothered about it to pay extra to do so.

**Figure 5: Sitting together**



**Question:** Which one of the following BEST describes why you didn't sit together?

Base: 1044

## How much did respondents pay to sit together?

Consumers sometimes paid substantial amounts of money to ensure they could sit together. Of those who noted how much they paid (468 people, excluding those who didn't know or couldn't recall), the majority told us it cost £5 - £9.99 per seat for specific seats together (23%). 20% paid £10 - £14.99, while 14% paid £30 or more.

**Figure 6: How much respondents paid to ensure sitting together**



**Question:** *If you paid extra to guarantee sitting together, approximately how much money did you pay, per seat, to sit together? If you are unsure please give your best estimate.*

Base: 583

## Sentiment analysis

---

The final question asked through our online engagement was:

*Tell us about your experience of seating arrangements. If there are any relevant details about your group booking that are not covered by the questions above, please explain them here. Please tell us whether you reported any concerns to the airline and if so, how these were handled.*

We asked people to limit their responses to 500 words.

To analyse this question, we used a basic qualitative research method which involved identifying, and then applying, a list of themes. To create a list of themes, 12 members of staff read a selected cross-section of ten responses in full and listed the different topics, ideas, concerns and comments that were raised in them. The staff then met and shared those lists and workshopped them into a shorter list of the most common themes. These were then rationalised further by the staff lead to a total of 20 key themes.

Staff then read all 1,069 responses between them from scratch and noted (or, using the software built into the consultation hub we used, 'tagged') the themes that arose in each and every answer. This method ensured that:

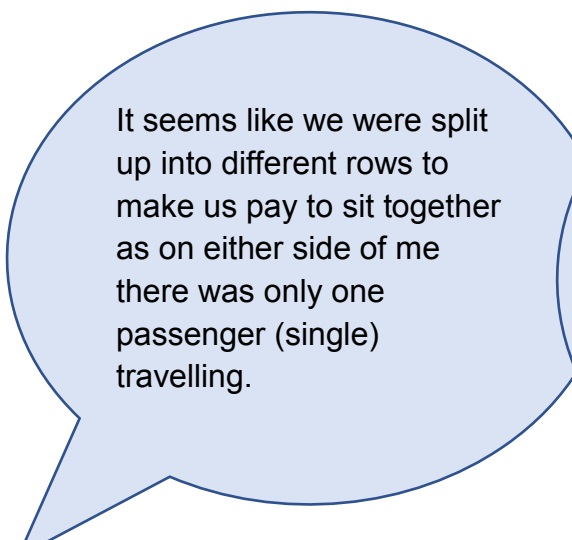
- every individual response was read from start to finish by a member of CAA staff;
- the themes we discuss in this section were generated by the respondents in their free text responses – they were not pre-identified by the CAA but are the key points raised directly the respondents themselves; and
- key themes emerging in each response were noted so that, where possible, they are analysed quantitatively (i.e. so that we know how many respondents, and of which stakeholder group, raised a particular topic or concern).

The themes identified as commonly discussed by respondents are summarised in the table below, along with the percentage of respondents raising them.

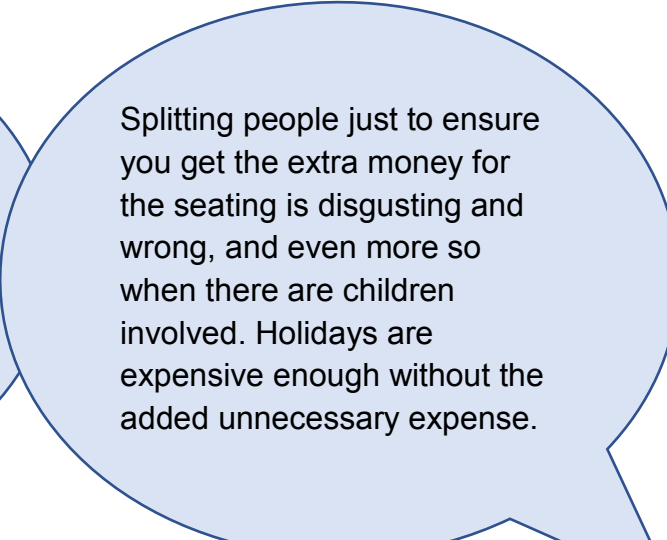
Our analysis focuses on the most popular of these. The full list of sentiments recorded in the CAA's analysis of our allocated seating engagement, together with the amount respondents raising each sentiment is set out in Appendix A.

## 1. The most commonly raised sentiment was the belief that the airline was purposefully separating people in order to make money

41% of respondents used the opportunity to tell us they believed this to be the case. Often they gave us examples of where they and their other group members had been seated at random by the airline, suggesting they were very far apart, or that they could see other groups that had been seated separately too.



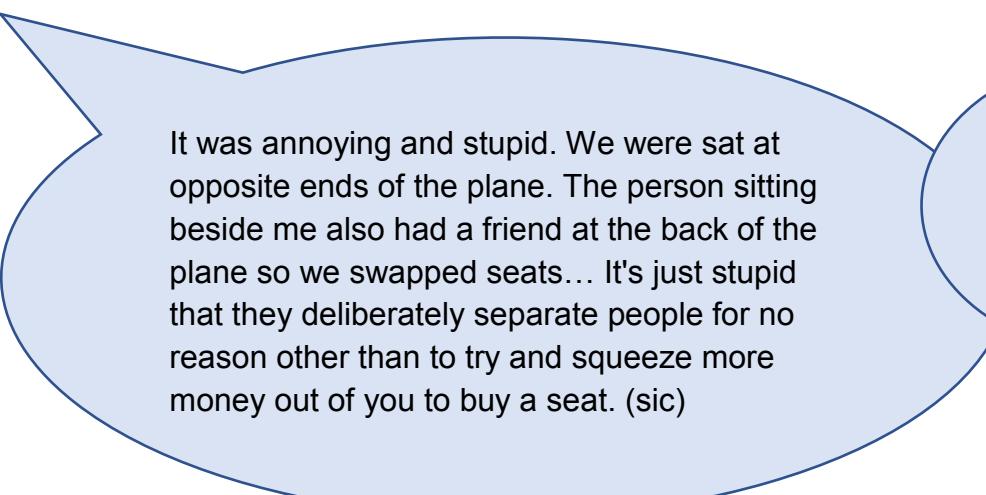
It seems like we were split up into different rows to make us pay to sit together as on either side of me there was only one passenger (single) travelling.




Splitting people just to ensure you get the extra money for the seating is disgusting and wrong, and even more so when there are children involved. Holidays are expensive enough without the added unnecessary expense.

## 2. The second most common theme was that the respondent specified that they were dissatisfied with the airline

This sentiment, expressed by one third (36%) of respondents, is closely associated with the belief that the airline is purposefully separating people. Respondents suggested this was bad behaviour on the part of the airlines.



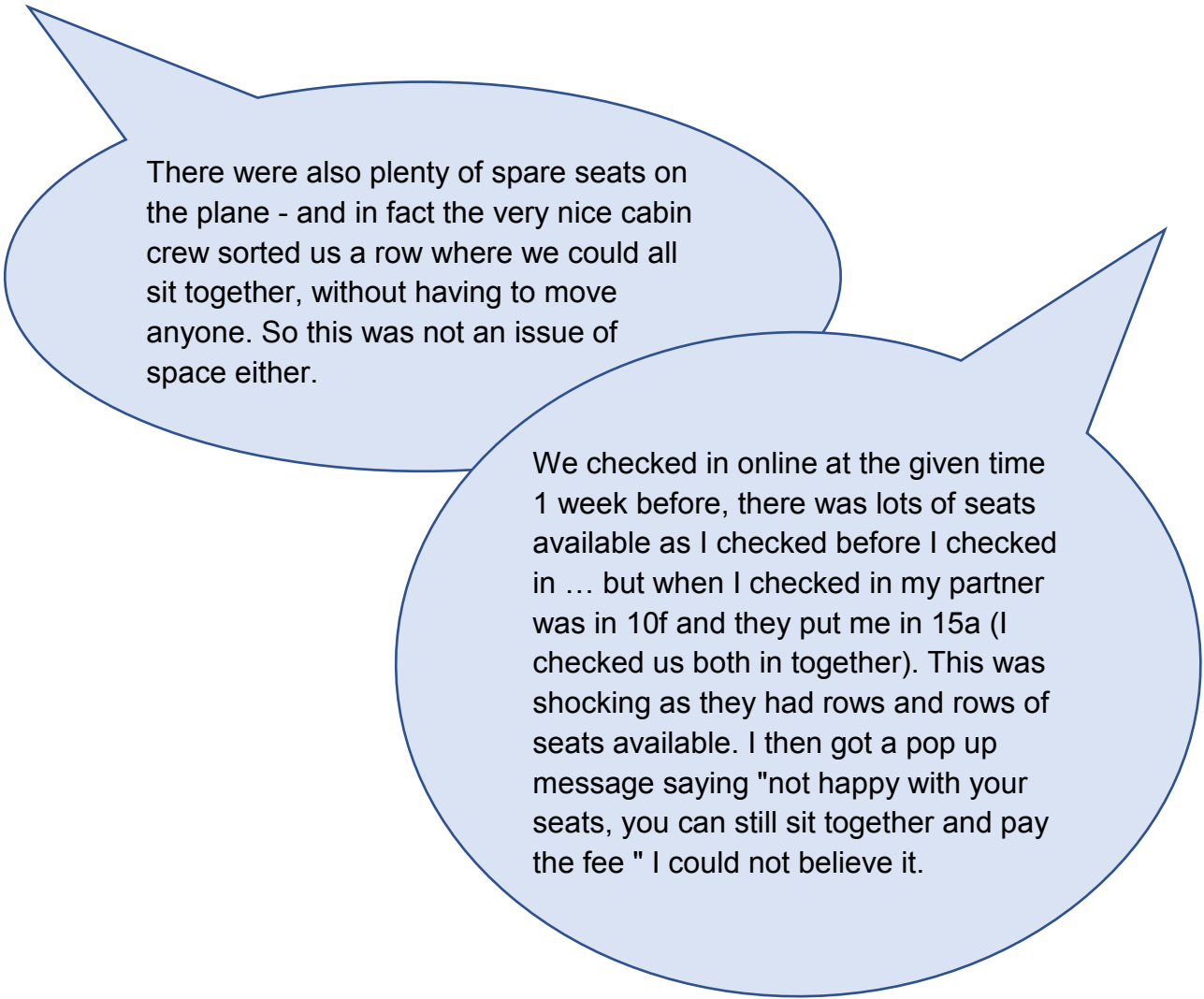
It was annoying and stupid. We were sat at opposite ends of the plane. The person sitting beside me also had a friend at the back of the plane so we swapped seats... It's just stupid that they deliberately separate people for no reason other than to try and squeeze more money out of you to buy a seat. (sic)



This sort of thing needs to be stopped it is daylight robbery

**3. The third most common statement from respondents was that, despite being split up, they could see seating available when they booked, checked in, or on board the flight**

People often suggested this was evidence that the airline was deliberately separating groups. 29% of respondents said they could see seating availability that would have enabled their group to be sat together.



There were also plenty of spare seats on the plane - and in fact the very nice cabin crew sorted us a row where we could all sit together, without having to move anyone. So this was not an issue of space either.

We checked in online at the given time 1 week before, there was lots of seats available as I checked before I checked in ... but when I checked in my partner was in 10f and they put me in 15a (I checked us both in together). This was shocking as they had rows and rows of seats available. I then got a pop up message saying "not happy with your seats, you can still sit together and pay the fee " I could not believe it.

**4. The other things people most often chose to tell us were:**

- that they paid to ensure they sat with their group (23%);
- that they felt they had no option but to pay (21%); and
- that it was reasonable for them to expect to be seated with other passengers they booked with (19%).

**5. One of the less common statements people shared with us, but that is concerning from a regulatory perspective, is that they, or someone in their group, had a disability and yet they were allocated seats apart.**

7% of respondents told us about these sorts of experiences. Some respondents told us that they had a physical disability and had booked assistance, and that they expected this to mean they would be seated together – as one person was assisting or caring for another. Other respondents told us of passengers with hidden disabilities, for example autistic children, and the problems that arose when they were separated.

I was even told over the phone that “if they let us off the seating charge everyone would want an autistic child just for the perks”! Absolutely appalling treatment in their money-making above compassion for families with disabilities. (sic)

Despite me having airport assistance booked - and noted on my records - our return seats were supposed to have been in 8f and 33d! I dont know what support my husband could give me when we were almost at opposite ends of the plane! We had no choice but to pay the extra money to ensure we had two seats together. This added to the expense of our 3 day break and put me off doing this again! (sic)

It was a difficult experience as my son has Adhd a hidden illness and there was no alternative seating available. It would have been better if we could have sat at the back of the plane all together. It would have been less stressful for me as I could have supported him more effectively and resulted in more positive experience for him, the rest of the family, other passengers and the crew on board. [The airline] staff were not accomodating or understanding (sic)



## 6. Respondents with children

13% of respondents told us they were travelling with children and that the seats they were allocated separated one or more child from the parent(s). This means that 48% of those who responded to the survey and were travelling with children were separated from their children. We are concerned by these figures, in particular in view of current EASA guidance on the seating of children.

We assumed children would be allocated a seat with their parents...It is easy to check family name and age of traveller, to ensure a child sits with their parent. For this reason I am convinced we were deliberately separated, to force us to pay.

Our whole party, including our 3 year old son were seated separately on the way home. We phoned the call centre, asked at the check-in and gate but were told to sort it out on board. After a couple near us heard what was happening, they offered to move, but it was very stressful.

## 7. Safety issues

Finally, a small percentage of respondents raised safety issues, including whether emergency evacuation could be impeded if people are separated from friends and family. Again, this is something that we take extremely seriously, and we are looking into this further.

I don't think [airline] are thinking of the health and safety of their customers as in an emergency family friends will naturally gravitate towards each other prior to emergency evacuation causing chaos and impeding others safe exit.

## 8. Sentiment analysis

The table below records the sentiments found in the CAA's analysis of our allocated seating engagement.

**Table 1: The sentiments recorded in the CAA's analysis of our allocated seating engagement, with the percentage of respondents raising each sentiment**

Topic	Sentiment expressed	Number of people	%
	(Total number of respondents 1,069)		
<b>Seat allocation</b>			
	The group was separated but saw adjacent seats were available (they noticed this either whilst booking, or checking in, or once on plane).	308	29%
	The respondent noted in their text that they paid to ensure sitting together.	246	23%
	The respondent expressed the sentiment that it was reasonable to expect to sit with the group they had booked with, without paying extra.	207	19%
	Passengers rearranged themselves once on board, to be near to their group members.	137	13%
	Passengers were moved around by cabin crew, to accommodate either themselves or other passengers.	45	4%
	Passengers were told not to move by cabin crew.	27	3%
<b>Disability</b>			
	Member(s) of the group (including the respondent) had a disability or needed extra help, and were separated.	74	7%
<b>Children</b>			

<b>Topic</b>	<b>Sentiment expressed</b>	<b>Number of people</b>	<b>%</b>
	The respondent was travelling with children and the seats they were allocated separated one or more child from the parent(s).	135	13%
	The respondent paid a charge to ensure they could sit with their children.	70	7%
<b>Safety</b>			
	The respondent expressed concern that if they were split from their family or group, this could impede evacuation as people would look for each other. They may also have expressed concern about fitting masks or other issues during an emergency.	34	3%
	Passengers were told not to move from specified seats due to weight distribution on aircraft.	11	1%
<b>Safeguarding</b>			
	The respondent expressed concerns about child safeguarding if the child was sat near strangers without parents nearby.	43	4%
	The respondent expressed personal safety concerns about sitting near strangers.	6	0.6%
<b>Costs/ assumptions</b>			
	The respondent expressed the belief that the allocations are not random, and/or that there is a deliberate scheme by the airline to split passengers, in order to make money.	433	41%
	The respondent felt forced to pay to ensure they had seats together, or felt they had no choice.	229	21%
<b>Sentiment towards airline</b>			

<b>Topic</b>	<b>Sentiment expressed</b>	<b>Number of people</b>	<b>%</b>
	The respondent stated they were unhappy with the airline's behaviour.	380	36%
	The respondent stated they were satisfied with the airline's behaviour.	33	3%
<b>General</b>			
	The respondent expressed the belief that seat allocation problems have been happening more recently and were previously not a problem.	124	12%
	The passenger was told random allocation was their choice because they did not pay to select specific seats.	80	7%
<b>Other</b>			
	The respondent specifically mentioned the CAA, usually either a positive/negative statement, or a request that the CAA take action.	29	3%