

CAP 2486: Performance framework for airline accessibility

Published by the Civil Aviation Authority, 2023

Civil Aviation Authority
Aviation House
Beehive Ring Road
Crawley
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.

Enquiries regarding the content of this publication should be addressed to:

consumerenforcement@caa.co.uk

The latest version of this document is available in electronic format at: www.caa.co.uk

Contents

Contents	3
Chapter 1: Introduction	5
Chapter 2: Background	6
Chapter 3: Pre-Journey	10
Website accessibility and the provision of essential information	10
Website accessibility	12
Provision of essential information	13
Requesting assistance and pre-notification	15
Requesting assistance and pre-notification	19
Providing extra information	20
Passing on information within airlines	22
Access and medical clearance	23
Accompanying persons	27
Chapter 4: At the airport	31
Checking-in	31
Boarding and disembarking	33
Chapter 5: During the Journey	38
Onboard facilities	38
Seating	38
Seat allocation	40
Armrests	41
Seating for an accompanying person	42
Supplementary seating	42
Access to toilets	43
Storage of manual wheelchairs onboard	46
Carriage of mobility and medical equipment	48
Assistance dogs	51
Training	56

Assistance during flight disruption	58
Chapter 6: Post Journey	61
Complaint handling	61
Compensation for lost, delayed, and damaged mobility equipment	63
Chapter 7: Definition of ratings and frequency of review	66
Definition of ratings	66
Overall rating	66
Needs Improvement and Poor	66
Frequency of review	67

Chapter 1

Introduction

1. The UK Civil Aviation Authority (CAA) is responsible for the enforcement of UK Regulation (EC) No 1107/2006 concerning the rights of disabled and less mobile persons when travelling by air (“UK Regulation (EC) No 1107/2006”). This applies to all flights from the UK and flights to the UK on UK and EU registered carriers. This legislation is intended to ensure that such people have the same opportunities for air travel as others, in particular that they have the same rights to free movement, freedom of choice and non-discrimination.
2. In 2014 the CAA introduced a UK wide Airport Accessibility Performance Framework. We consider that in general the framework has been successful in driving improved compliance with UK Regulation (EC) No 1107/2006 and improving the overall quality of assistance at many UK airports. We have been heartened by the positive and constructive way in which airports have embraced the framework and its aims.
3. In relation to airlines, the requirements of UK Regulation (EC) No 1107/2006 cover the whole passenger experience: pre-journey; at the airport; on board the aircraft and post-journey. Given this broad remit, the CAA believes it is important to accompany the airport framework with a key set of standards to hold airlines to account in upholding the rights of disabled persons and persons with reduced mobility. In this regard, we are considering the introduction of an Airlines Accessibility Framework.
4. This consultation sets out the work undertaken by the CAA to date for the potential development of an Airlines Accessibility Framework and seeks views from stakeholders.
5. Responses to this consultation document should be submitted via the [consultations page](#). If you are unable to use the Consultations page, or if you have any questions about the document, please send them to consumerprotection@caa.co.uk. Alternatively, you can write to: Consumer Protection, Consumer & Markets Group, Civil Aviation Authority, 11 Westferry Circus London E14 4HD.

Chapter 2

Background

6. The CAA is frequently made aware of issues experienced by passengers who face challenges at various stages of the passenger experience when travelling by air. With this in mind, we are considering putting in place an Airlines Accessibility Framework to drive improved compliance with UK Regulation (EC) No 1107/2006 and more generally improve the overall passenger experience for disabled and less mobile persons. We also believe that a standardised framework will help drive consistency across airlines so passengers can be confident that they will receive their rights whichever airline they choose to travel with.
7. To understand how airlines comply with the requirements of UK Regulation (EC) No 1107/2006 and provide an indication of whether we should pursue the development of an Airlines Accessibility Framework, in 2019 the CAA began a review of airline accessibility. We issued an extensive voluntary questionnaire to 20 airlines, 14 of which responded to the CAA, with follow up meetings on the contents of their responses. In addition, we carried out reviews of airline websites and booking processes and undertook a significant level of observation of airline operations at a number of UK airports. Unfortunately, shortly after completion of this research phase, the onset of the pandemic resulted in us pausing our work. We restarted in 2022. Given the significant impact of the pandemic on the aviation industry we made the decision to refresh our work to consider any developments in airline policies and procedures since 2019, rather than relying on potentially out of date research. We reissued the questionnaire to the airlines that had responded to the CAA in 2019 (this time to 12 airlines following the ceasing of operations of one, and reduction in service of another). Nine airlines responded in 2022. In our research we utilised the responses from 2019 for the three airlines that failed to resubmit a completed questionnaire. In addition, we have met on a regular basis with key disability and airline stakeholders to discuss our proposals for the development of an Airlines Accessibility Framework.
8. During our work, we have identified some issues that we consider may provide a barrier to access for some passengers. We also noted some inconsistencies in the application of operational policies between airlines, often because of varying interpretation of safety rules. Such inconsistencies can create confusion for passengers and potentially reduce choice for disabled and less mobile passengers. The findings of our review are included in each of the sections in this consultation paper.

9. Although our review did not identify a sizeable number of issues and, in general, we are satisfied by the performance of many of the carriers we surveyed, we consider that there are sufficient concerns for us to develop an Airline Accessibility Framework. The framework will look to clarify the requirements of UK Regulation (EC) No 1107/2006 (and associated national and local guidance, particularly from the European Commission and European Civil Aviation Conference), highlighting existing good practice and making recommendations on best practice, where appropriate in reference to existing guidance.
10. We also have had feedback that a framework would be useful to airlines to supplement existing national and international guidance. It will help airlines to ensure that they implement compliant policies and procedures and give disabled and less mobile passengers reassurance that they will receive their rights. We intend for this framework to apply to all UK and non-UK airlines which operate to the UK. As with airports, we propose to use the framework to carry out public assessments of individual businesses.
11. In this document are suggested criteria on how we might assess airlines against the proposed guidance material. Our view is that by meeting the criteria for a 'good' rating, airlines will be able to give disabled persons and those with reduced mobility the confidence to travel knowing that their assistance needs will be met. The publication of our assessments of airlines will further give disabled persons and those with reduced mobility the ability to incorporate information on the performance against the ratings into their consumer decision-making; and to enable people to better hold the airline to account if the assistance provided by the airline does not meet their expectations.
12. To ensure that the criteria used for assessments is proportionate, reasonable and fair, and to ensure the guidance material addresses the key areas of the passenger journey, we are now consulting on our approach to this framework.
13. UK Regulation (EC) No 1107/2006 is the primary vehicle through which disabled and less mobile persons are provided with legal rights. This is supplemented by guidance available for airlines on accessibility through a number of diverse sources. Our proposed guidance is intended to direct airlines and other businesses to the relevant international and national legislation and guidance. In some areas, we propose additional guidance, as well as providing examples of best practice. The legislation and guidance referred to in this document include:
 - UK Regulation (EC) No 1107/2006 concerning the rights of disabled and reduced mobility persons when travelling by air (as retained in UK law ('UK Regulation (EC) No 1107/2006'))
 - European Civil Aviation Conference Document 30, as amended in September 2021 ('ECAC Doc 30')

- CAP2241 (Interpretative Guidelines on the application of Regulation (EC) No 1107/2006 concerning the rights of disabled and less mobile persons when travelling by air) ('CAP2241')
- International Civil Aviation Organisation Manual on Access to Air Transport by Persons with Disabilities ('ICAO Manual')
- CAP1603: CAA guidance for airlines on assisting people with hidden disabilities ('CAP1603')
- UK Regulation (EC) No 261/2004 establishing common rules on compensation and assistance to passengers in the event of denied boarding and of cancellation or long delay of flights as retained in UK law ('UK Regulation (EC) No 261/2004')
- International Air Transport Association's (IATA) Passenger Accessibility Operations Manual ('IPAOM')
- International Air Transport Association's Resolution 700 – Acceptance and carriage of passengers requiring special assistance
- For UK airlines, UK Regulation 965/2012 (Air Operations) provides requirements and guidance on carriage of special categories of passengers

14. Airlines should also be aware that, as service providers, they have obligations to certain groups of people¹ under the Equality Act 2010 (EA 2010). In the context of providing a service, the EA 2010 prohibits discrimination² against individuals because of their protected characteristic(s), including disability. The prohibition on discrimination incorporates the prohibition on harassment and victimisation. The EA 2010 also requires service providers to make reasonable adjustments for disabled people.

15. To avoid an overlap between the requirements of the EA 2010 and UK Regulation (EC) No 1107/2006, the EA 2010 requirements on making reasonable adjustments for disabled people do not apply in respect of anything governed by UK Regulation (EC) No 1107/2006³. However, for those aspects of their service provision that fall outside of the scope of the scope of UK Regulation (EC) No 1107/2006, airlines should ensure that they can and do

¹ People with the protected characteristics. These are age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

² Section 29 of the EA 2010.

³ More specifically, the EA 2010 requirements on making reasonable adjustments do not, so far as they relate to disability, apply in respect of (a) transporting people by air; (b) a service provided on a vehicle for transporting people by air; or (c) anything governed by Regulation 1107/2006.

comply with the requirements of the EA 2010, including making reasonable adjustments for disabled people.

16. Although the CAA does not enforce the EA 2010, the public sector equality duty ('PSED') in the EA 2010 places a legal duty on the CAA to have due regard to furthering certain societal objectives relating to equality, including in relation to disability, whenever carrying out its functions. The CAA will have regard to PSED as it develops this framework.
17. We do not intend the framework to be all encompassing. We propose that businesses should always read any guidance provided under the framework in combination with the full text of the legislation and guidance listed above, and any other relevant legislation and guidance which is published or amended from time to time.
18. In light of the significant amount of preparatory work we have carried out since 2019, we have included a draft of different sections of the proposed guidance within this consultation. However, we recognise that there are many other stakeholders who we have yet to receive feedback from. In this consultation, we encourage responses from all stakeholders, but particularly those with whom we have not already had direct conversations with during our research.
19. This consultation paper is divided into sections covering the key parts of the passenger journey. Each section includes:
 - a. a summary of the findings of our research and how the findings have helped inform the content within the proposed draft of the guidance;
 - b. a draft of proposed text for inclusion within the guidance (included as boxed text);
 - c. suggested criteria on how the CAA might assess airlines against the proposed guidance material (included in the boxed text); and
 - d. suggested questions to facilitate a structure to consultation responses.

Q1. Do you agree we should introduce an Airlines Accessibility Framework?

Chapter 3

Pre-Journey

Website accessibility and the provision of essential information

20. The CAA's view, informed through its regular interaction with disability stakeholders, is that having essential information readily available to passengers helps consumers in making an informed decision before making a booking. In 2014 the CAA issued requirements for airlines to include essential information on their websites and for this information to be easy to find, specifically one click away from the home page. ECAC adopted our requirements as Annex 5-J to Doc 30.
21. Despite our work in this area, we note that of the twelve airlines surveyed in the most recent questionnaire, six fail this standard for one click away from the home page and all airlines' websites lack some essential information. We note that information that airlines require to ensure smooth operations is more likely to be available. For example, airlines provide a good amount of information to passengers on medical and mobility equipment. An example of best practice that we found is that several airlines include information on the cargo door dimensions and maximum wheelchair dimensions for their fleet. But information on some areas is often not available. In addition, we have been made aware by disability stakeholders that there is a risk that passengers will not receive the relevant information if the operating carrier is different from that which is booked. It is important that essential information on the operating carrier is given to passengers and that they are given the option to rebook onto a suitable flight or cancel. For example, we have received a complaint whereby a passenger booked a flight with an airline with an onboard wheelchair, only for the flight to be operated by a carrier which did not carry such wheelchairs.
22. During conversations with external stakeholders, we found that due to legacy platform issues the majority of airline websites are currently not Web Content Accessibility Guidelines (WCAG 2.1) conformant. Airlines have assured us that they have plans in place to resolve these issues. Disability stakeholders have told us that website accessibility must include the accessibility of applications used on mobile phones and tablet devices as increasingly airlines use them for booking and checking in passengers.
23. The CAA's view is that websites and mobile applications should be accessible. This is often the entry point to travelling by air for both disabled and non-disabled passengers. With this in mind, the CAA is separately planning to undertake a

review of the accessibility of the websites of the largest airlines operating into/out of the UK. This will be published later in 2023. The expectation is that this will both improve the CAA's understanding of website accessibility and drive airlines to make improvements in the accessibility of their websites and mobile applications where issues are identified.

24. Below is the proposed text for the guidance document on website accessibility and the provision of essential information, including proposed criteria on assessments of airline policies and practices in this area.

Website accessibility and the provision of essential information

Website accessibility

25. Paragraph 1 of Annex 5-J of ECAC Doc 30 sets out general guidelines to ensure that the information and guidance provided by airlines on their websites is accessible:
- ‘Information should be one click away from the home page [of an airline’s website]. One ‘click’ includes a mouse rollover, which then invites the passenger to select the ‘Special Assistance’ link from a menu or list of other links’.
 - ‘The ‘title’ for hyperlinks to this information should be ‘Special Assistance’ or similar’.
 - ‘Information should be presented in a clear and easy to understand way and accessible for passengers with disabilities⁴ and reduced mobility passengers [using language that is easy for all passengers to understand]. Technical jargon and abbreviations should be avoided.’
 - ‘The design of the website should be in conformity with existing international guidelines on website accessibility, such as Web Content Accessibility Guidelines 2.0 (WCAG 2.0) of the W3C and fulfil at least the “AA” standard under these guidelines⁵.’
26. Q4 of CAP2241 further states that websites should be developed ‘allowing access to consumers with disabilities on an equal basis to all passengers, rather than developing parallel websites for these consumers. The design of such websites should always take into consideration existing international guidelines and EU standards in order to meet the needs of passengers with impairments such as blindness or low vision, deafness or hearing loss, learning disabilities, cognitive limitations, restricted movement, photosensitivity or any combinations of these’.
27. The CAA strongly recommends that an airline’s website and applications conform to the latest Web Content Accessibility Guidelines (currently WCAG 2.1) and that airlines should, at a minimum, ensure that their homepage, information on passenger rights for all passengers, essential information for disabled and

⁴ Accessible formats means that information should be provided using text, audio (equipped with subtitles and/or sign language interpretation) and/or electronic means to be accessible to all. Accessible formats include, but are not limited to, large print, Braille version, easy-to-read version, audio format such as tapes or CDs, video format like DVDs, and electronic format.

⁵ <https://www.w3.org/TR/WCAG21/>

less mobile passengers (as set out below), and the booking and check-in function be in compliance with WCAG 2.1. Where this is not currently the case, airlines should be able to demonstrate that they have a roadmap to meeting WCAG 2.1 and budget in place to achieve this over a reasonable timeframe.

Provision of essential information

28. Article 4.3 of UK Regulation (EC) No 1107/2006 states that 'an air carrier or its agent shall make publicly available, in accessible formats and in at least the same languages as the information made available to other passengers, the safety rules that it applies to the carriage of disabled persons and persons with reduced mobility, as well as any restrictions on their carriage or on that of mobility equipment due to the size of aircraft.'
29. Annex II of UK Regulation (EC) No 1107/2006 includes a requirement for the 'communication of essential information concerning a flight in accessible formats'.
30. Paragraph 2 of Annex 5-J of ECAC Doc 30 sets out the minimum information which should be provided to consumers on the dedicated Special Assistance pages.
31. The 'Carrier Identity Regulations' (UK Regulation (EC) No 2111/2005 on the establishment of a Community list of air carriers subject to an operating ban within the Community and on informing air transport passengers of the identity of the operating air carrier⁶) requires airlines to ensure that passengers are informed of the operating carrier if it differs from the contracted carrier.
32. The CAA recommends that disabled and less mobile passengers should be given the option to cancel the booking or rebook with a suitable carrier if the operating carrier is advised at time after the booking is made; and that disabled and less mobile passengers should also be advised of a change of operating aircraft, even if the operating carrier does not change.
33. Provision of essential information should be available prior to passenger making a booking, when possible, or as soon as it is available.

Proposed criteria to achieve specific ratings:

To achieve a 'Good' rating, airlines must achieve the following:

⁶ [Regulation \(EC\) No 2111/2005 of the European Parliament and of the Council of 14 December 2005 on the establishment of a Community list of air carriers subject to an operating ban within the Community and on informing air transport passengers of the identity of the operating air carrier, and repealing Article 9 of Directive 2004/36/EC \(Text with EEA relevance\) \(legislation.gov.uk\)](#)

- Website pages relating to: Homepage; information on passenger rights for all passengers; essential information for disabled and less mobile passengers; and the booking and check in function (if applicable) are accessible in compliance with WGAC 2.1. For the first assessment only, the airline may present plans to achieve this in a reasonable timeframe to achieve a 'Good' rating.
- All ECAC Doc 30 Annex 5-J information is included on the website, one click away from the homepage.
- Have a process to inform passengers of a change to the operating carrier or aircraft.

To achieve a 'Very Good' rating, an airline must achieve all the measures set out in 'Good' and additionally meet the following measure:

- Website and all applications are WGAC 2.1 compliant.

- Q2. Are the proposed criteria to achieve a ‘Good’ and ‘Very Good’ assessment level in relation to website accessibility and the provision of essential information appropriate? Should the CAA consider setting the standards at a different level (please explain your rationale)?**
- Q3. Do you agree that airlines' websites and applications conforming to the latest Web Content Accessibility Guidelines (currently WCAG 2.1) is best practice? Are there any examples that you would highlight of good practice for website accessibility either in the aviation sector or elsewhere which would be more appropriate?**
- Q4. Do the criteria adequately take into account commercial considerations for airlines?**
- Q5. Do the essential information requirements sufficiently meet the needs of disabled passengers? Would it be helpful to require any additional information, possibly to achieve a ‘Very Good’ rating?**
- Q6. Would generic information on passenger rights regarding accessibility be useful to supplement information provided by individual carriers?**

Requesting assistance and pre-notification

34. Under UK Regulation (EC) No 1107/2006 airlines must provide methods for disabled and less mobile passengers to notify to the airport and airline of the need for assistance. It also puts obligations on airlines to pass on the requests to airports and the operating carrier within 36 hours of the published departure time of the flight (if the request from the passenger is outside 48 hours of the published departure time) or as soon as possible (if the request from the passenger is within 48 hours of published departure time).
35. Our research identified that airlines use various methods to collect assistance requests. Below is a breakdown of the different ways of requesting assistance of the 12 airlines who completed our questionnaire:
- Phone lines – 12 airlines
 - Chat function – 3 airlines
 - Email function – 4 airlines
 - Through the website booking flow – 5 airlines
36. Our view is that airlines should offer several diverse ways to book assistance and that being able to add assistance requests through the website booking flow and through a mobile application may not only improve pre-notification but make this service more accessible to passengers who are not able to talk to someone on the phone.

37. From our research we note that:
- Of the airlines who allow for the special assistance to be added through the website booking flow, all five airlines use tick box options or a dropdown list for passengers to select from. Two airlines also have the ability to collect extra information (in the form of free text) from passengers;
 - All airlines surveyed use existing IATA special service request codes (WCHR, WCHC etc.) as a minimum to collect information about the assistance needs of the passenger, but some airlines also use extra codes to differentiate the passengers' needs more clearly; and
 - Ten airlines provide confirmation of assistance requested to the passenger, although the methods vary. Some airlines provide an email confirming the request whilst others hold the details as part of the booking, which a passenger can access through logging onto their passenger's profile on the airline website. Two airlines do not provide any written confirmation.
38. The CAA has received some complaints from disabled passengers about an inability to contact an airline to discuss their individual needs. Our experience is that this can cause anxiety for the passenger and potentially restricts their choice if all airlines are not contactable. Our research identified that some airlines have a separate team, available for contact via the phone, specialising in accessibility matters and we consider this to be best practice.
39. The CAA has been collecting and monitoring the pre-notification levels at UK airports since 2010. From this data we have evidence that pre-notification levels vary significantly depending on airline and airport. Our view is that this is often the result of the quality of the processes used by airlines to capture assistance requests and to pass the information to airports. Based on conversations that the CAA has had with stakeholders it is our view that factors that may cause low or poor quality pre-notification are:
- Assistance is difficult to request (for example long waiting times for phone lines, lack of ability to book via the website/mobile application booking flow) or there is no information from an airline about how to request assistance;
 - Limited options for capturing information about the assistance needs leads to the wrong assistance being requested;
 - Travel agents booking on behalf of passengers failing to ask about assistance needs or failing to pass this information on to airlines and airports;
 - Varying legislation - In other countries (such as the US) passengers do not have to pre-notify their assistance needs before they travel, as such consumers from other countries may not know about this requirement when travelling to/from the UK; and

- Lack of an incentive to pre-notify because there is no obvious benefit to passengers to do so (e.g. pre-notified passengers are assisted no more quickly on arrival).
40. Performance from some airlines is sufficiently poor for us to question whether airlines are doing enough to capture assistance requests. Airlines should ensure that support meets the needs of each passenger, both to ensure that the assistance is appropriate but also to make the general operation more effective. Improved levels of pre-notification should help ensure that a better service can be provided.
41. We have received a range of complaints over a number of years from airlines that online travel agents do not pass on all information to airlines. Based on data received from airports our view is that where a booking is made through a travel agent (either in person or online) information is more susceptible to not being passed on, likely because of the extra cog in the process. The data shows that airlines that are more likely to receive bookings made through travel agents, generally perform less well with pre-notification. As a result, we expect these airlines to do more to ensure their travel agents collect and pass on essential information. In 2012, the CAA and the Association of British Travel Agents jointly published guidance for travel agents on pre-notification. The publication of this framework presents a good opportunity for this guidance to be reviewed and republished.
42. As every disability is different, the CAA's view is that passengers should have the option to provide additional information to supplement their assistance request. In the responses to our questionnaire, we identified that airlines use different methods to capture additional information. Some airlines use 'free text' which is automatically transmitted with the IATA code. Other airlines pass on extra information about an individual's needs through emails. Our view is that free text enables information to be transmitted in a consistent manner and reduces the risk of human error (for example, forgetting to send an email). The infrastructure to record and pass on 'free text' messages already exists in the form of the SITA electronic messaging system and is widely used by airlines.
43. The CAA considers that if:
- Airlines provide disabled and less mobile passengers with the opportunity to provide 'free text' information as part of their pre-notification process (in addition to the IATA codes); and
 - Airlines meet their obligation to provide this information to the airports in line with the timelines required under UK Regulation (EU) No 1107/2006

this would be a significant enabler for airports to tailor their assistance provision to the specific needs of an individual. This would help airports to deliver a more passenger focussed and effective assistance service.

44. The CAA further considers that there should also be an ability for additional information to be added to the booking as free text after the initial request for assistance and until the point of departure. Airlines should ensure that this additional information is also passed to the airport or assistance provider in the required timeframes.
45. We intend for the airline framework to address what further actions can be taken to support encouraging more passengers to pre-notify. In our letter of June 2022 to UK airports and the major airlines flying from the UK⁷, we reiterated our view that airlines need to focus more on better pre-notification to improve the experience of passengers onboard and at the airport.
46. We note from our research two airlines add pre-notification information to a passenger's frequent flyer profile or airline profile. Disability stakeholders have told us that the ability to provide this information via a frequent flyer profile or airline profile, when this results in a passenger only needing to provide information once instead of every time they travel, is beneficial.
47. Below is the proposed text for the guidance document on requesting assistance and pre-notification, including proposed criteria on assessments of airline policies and practices in this area.

⁷ <https://www.caa.co.uk/media/cb4mqahj/june-2022-prm-letter.pdf>

Requesting assistance and pre-notification

Requesting assistance and pre-notification

48. Under Article 6 of UK Regulation (EC) No 1107/2006 'Air carriers, their agents and tour operators shall take all measures necessary for the receipt, at all their points of sale in the United Kingdom, including sale by telephone and via the Internet, of notifications of the need for assistance made by disabled persons or persons with reduced mobility.' It also puts obligations on airlines to pass on the requests to airports and the operating carrier within 36 hours of published departure time of the flight (if the request from the passenger is outside 48 hours of published departure time) or as soon as possible (if the request from the passenger is within 48 hours of published departure time).
49. Annex 5-H of ECAC Doc 30 sets out guidelines on pre-notification of disabled and less mobile persons. In line with paragraph 4.1 the responsibility for actions to improve pre-notification lies with air carriers, travel agents and airports. It is the CAA's view that following the guidance in Annex 5-H of ECAC Doc 30 will help deliver a performance that meets UK Regulation (EU) No 1107/2006.
50. ECAC Doc 30 Annex 5-J paragraph 1.4 states that 'Alternative means of communication to transmit the information should be provided'. For example, in addition to the ability to provide information via a website booking page, using 'a direct phone line (local landline or free number, not at the charge of the passenger), web chat, e-mail, mail etc'. An airline should not solely rely on one communication channel to enable a passenger to provide information.
51. Airlines should proactively engage with their network of tour operators and travel agents to ensure the correct gathering of information from passengers requiring assistance.
52. Paragraph 4.2.2 of Annex 5-H of the ECAC code includes actions for air carriers and travel agents to take to improve the booking process. The CAA considers that these actions be undertaken to help ensure compliance with Article 6. These are:
 - 'Develop systems for ensuring consumers are prompted during the booking process to check whether they require assistance and to ensure that the right information is given.'
 - 'Draw up a checklist of key questions to be asked by travel agency/call centre staff to ensure that they have correctly understood the needs of the passenger.'

- ‘Develop information for [disabled and less mobile persons] on the types of assistance available, using the IATA codes as a base, but considering symbols and passenger friendly language. This would allow disabled and less mobile persons to validate whether the airline has assessed their assistance needs.’
- ‘Encourage disabled and [passengers with reduced mobility] to take responsibility for their journey.’ The CAA encourages airlines to capturing more information about passengers’ needs, to promote independence for disabled and less mobile passengers.
- ‘Provide signposts to airport websites to find out more about the layout [of the airport] and decide whether they need assistance.’
- ‘Consider capturing data on [disabled and less mobile persons] needs as part of an air carrier frequent flyer schemes. This could be included within projects to re-design such schemes.’ The CAA recommends use of passenger profiles for passengers with permanent disabilities or medical conditions to store information to avoid the need for passengers to complete forms for each journey, subject to data protection laws.
- ‘Provide confirmation to [disabled persons or persons with reduced mobility] that their assistance request has been noted and passed on.’ The CAA recommends this can be in the form of an email or a medium suitable to the passenger’s needs.

Providing extra information

53. Disabled people and less mobile passengers have a diverse range of needs. It includes people with a physical disability; those with a non-physical disability; and those with both. Therefore, to ensure that the assistance provided will meet the person’s particular needs throughout the entire journey, it is critical that individuals are able to provide sufficient information on their assistance needs to the airline, their agent, or the tour operator. For example, information such as dimensions of mobility equipment and training of assistance dogs are required to ensure that passengers are not prevented from travelling because of safety restrictions. It is also critical that, in turn, the airline, their agent or the tour operator, can pass on this information to both the airport (either directly or to the supplier contracted at that airport to provide the assistance) and to the airline (where relevant). Further, it is also critical for airports and airlines to be able to pass this information on within their own organisations and third-party contractors to ensure that all relevant staff are appropriately informed.
54. UK Regulation (EC) No 1107/2006 states under article 7 that ‘The assistance provided shall, as far as possible, be appropriate to the particular needs of the individual passenger’.

55. In the CAA's view, an option for passengers to seek advice before travel is crucial to disabled passengers with more complex needs. It is best practice for airlines to have a separate team specialising in accessibility matters. However, even for airlines where this might not be proportionate, some staff should have expertise. Procedures for liaising with passengers seeking this advice should be accessible, including by email or over the telephone (local landline or free of charge).
56. The CAA's view is that it is best practice to offer passengers the opportunity to book assistance directly through the website/mobile application booking flow, at a minimum using pre-set multiple choice tick boxes or dropdown options that correspond to the IATA special service request codes⁸ ('IATA codes') and the opportunity to provide extra information in addition to IATA codes.
57. ECAC Doc 30 Section 5.5.3.1 also states that 'In order to provide the appropriate assistance, the air carrier should inform on the actual needs of the passenger using the 'free text' box, visible in the messaging system between airlines and airports (PAL/CAL messaging). This is particularly useful in the case of passengers with invisible disabilities or passengers who need only specific assistance.'
58. Further to this, Annex 5-H of ECAC Doc 30 also states that air carriers should 'provide additional information alongside IATA codes to specify the individual needs of the passenger. Air carriers should have in place a system to receive additional information about a person's particular needs should it be needed. This could be received as part of the online booking process or added to the 'notes' of a booking later. This additional information should be passed to the airport or service provider in the form of 'free text' or other similar method. This would help ensure that, as far as possible, the assistance would be appropriate to the needs of the individual passenger throughout the entire journey. It would be particularly useful for people whose needs cannot be so easily identified via IATA codes. This might include people with non-visible disabilities such as dementia or autism where needs are often diverse'.
59. Annex 5H of ECAC Doc 30 also emphasises the importance of airlines having in place systems that can pass on extra information contained within 'PAL' and 'CAL' messages (or other means), in addition to general IATA assistance codes for people with non-visible disabilities. The CAA recommends that airlines use this existing system to record and pass on information on the assistance needs of individuals, including in the form of free text. However, the CAA acknowledges that there may be other methods for passing on information about the assistance needs which may be equally effective.

⁸ [Service SSRs - Special Service Requests \(SSRs\) \(iata.org\)](https://www.iata.org/en/your-travel/air-travel/airline-services/airline-services-for-passengers-with-disabilities)

Passing on information within airlines

60. Airlines must be able to pass on information about an individual's assistance needs within their own organisations, as well as to the airport or service provider. Airlines should therefore have systems and processes in place to ensure that all the information about an individual's assistance needs is recorded and can be passed on to airline staff where this is relevant. This includes staff working at the airport, whether the airline's own or contracted staff (e.g. ground handlers), and onboard the aircraft (i.e. cabin and flight crew). Ideally, all the information about an individual's assistance needs should be associated with the individual's reservation so that all relevant passenger facing staff have access to it through all stages of the passenger journey.

Proposed criteria to achieve specific ratings:

To achieve a 'Good' rating, airlines must achieve the following:

- There should be accessible means for passengers to seek advice before travel, from staff with expertise in accessibility issues.
- Have taken all measures necessary to capture pre-notification requests through an accessible online process or through an adequately resourced phone service.
- Have proactively engaged with their network of tour operators and travel agents to ensure the correct gathering of information from passengers requiring assistance.
- Have processes to capture and notify airports of requests for assistance at least 36 hours before the published departure time of every flight (where the request was made at least 48 hours ahead of the published departure time) or as soon as possible (if the request was made within 48 hours of published departure time) and notify airport third party contractors; its own operations; and its own third-party contractors. This includes additional information about passengers' needs (i.e. more than IATA codes).

To achieve a 'Very Good' rating, an airline must achieve all the measures set out in 'Good' and additionally meet the following measures:

- Have pre-notification levels of above 65% in year prior to assessment.
- Capture 'free text' about a disabled and less mobile passenger's accessibility needs and to pass this on to airports/service providers.
- Carried out all ECAC recommended actions in paragraph 52.

- Q7. Are the proposed criteria to achieve a ‘Good’ and ‘Very Good’ assessment level in relation to requesting assistance and pre-notification appropriate? Should the CAA consider setting the standards at a different level (please explain your rationale)?**
- Q8. Are there additional actions which the CAA could require of airlines to further improve pre-notification levels?**

Access and medical clearance

61. All but two airlines said that they limit numbers of disabled and less mobile passengers for safety reasons (which generally require that the total number of passengers with reduced mobility on a flight may not exceed the number of passengers without reduced mobility to assist them in case of emergency). However, two airlines advised that they restrict numbers of disabled and less mobile passengers based on additional factors. It is not immediately obvious what safety rationale there is for these limits. We consider this a potentially significant issue and will prioritise action in this area.
62. Our research of airline websites also shows that some carriers require medical clearance when we consider there may not always be a valid reason to do so, or at least full due diligence had not been carried out by the airline. Complaints to the CAA found that the types of questions that staff ask are not consistent between airlines and that in certain situations staff do not ask the correct follow-up questions to determine the passenger’s needs, resulting in safety rules being misinterpreted by airline staff. As with pre-notification information, we note that two airlines stored information on passengers’ requirements, to be used for future flights.
63. Below is the proposed text for the guidance document on access and medical clearance, including proposed criteria on assessments of airline policies and practices in this area.

Access and medical clearance

64. UK Regulation (EC) No 1107/2006 only allows an airline to refuse carriage for two reasons: (1) safety requirements; and (2) if the size of aircraft or its doors prevents embarkation. It is the CAA's view that Article 4 of the Regulation should only be exercised if all reasonable options to provide access have been considered.
65. UK Regulation (EC) No 1107/2006 also states that in the event of refusal to accept a reservation due either to the safety requirements or the size of the aircraft or its doors, the airline, its agent, or the tour operator must 'make reasonable efforts to propose an acceptable alternative to the person in question'. It is the CAA's view that travelling on an alternative flight with the airline would be reasonable, but this should ideally be agreed with the passenger and should not be an automated process.
66. UK Regulation (EC) No 1107/2006 states that in the event of a refusal to accept a reservation due either to the safety requirements or the size of the aircraft or its doors an airline 'shall immediately inform the disabled person or person with reduced mobility of the reasons therefore. On request, an air carrier... shall communicate these reasons in writing to the disabled person or person with reduced mobility, within five working days of the request'.
67. ECAC Doc 30 states that airlines 'should not refuse, on the grounds of disability or of reduced mobility':
- 'to accept a reservation for a flight departing from or arriving at an airport' in the UK;
 - 'to embark a person with disabilities or [person with reduced mobility] at such an airport provided the person concerned has a valid ticket and reservation'.

This includes limitation of assistance requests through the booking process. The only justification for any limitation on the number of passengers able to request assistance would be for safety reasons and an airline must not apply quotas on the number of disabled persons and less mobile passengers it is able to carry on a particular flight for non-safety operational reasons (for example to help streamline passenger embarkation or disembarkation processes). For UK airlines, UK Regulation 965/2012 (Air Operations) provides requirements and guidance on carriage of special categories of passengers and for foreign airlines local safety rules provides requirements and guidance.

68. UK Regulation (EC) No 1107/2006 does not impose any obligation on disabled persons and persons with reduced mobility to provide evidence of their disability to justify the assistance requested. Further, CAP2241 states that proof cannot be requested unless there is 'reasonable doubt that the passenger can complete the flight safely without requiring assistance during the flight'. In these situations, the

airline 'may assess whether the passenger is fit-to-fly and request information to support that assessment'. The CAA's view is that the fit-to-fly process should be reasonable and proportionate. Disabled passengers should not be routinely chosen for medical clearance unless there is a valid reason for doing so. Airlines should ensure processes reflect this so that passengers are not treated unfairly.

69. UK Regulation (EC) No 1107/2006 sets out that 'A disabled person or a person with reduced mobility who has been denied embarkation on the grounds of his or her disability or reduced mobility and any person accompanying this person ... shall be offered the right to reimbursement or re-routing' as provided for in UK Regulation (EC) No 261/2004. If a passenger is refused boarding at a UK airport based on their disability or reduced mobility, without a genuine medical rationale, it could be deemed to not be a 'reasonable ground to deny them boarding'. The passenger therefore would be due compensation in addition to their re-routing or reimbursement rights. In addition, IATA Resolution 700 states that no medical clearance need be sought for passengers who only require assistance in the airport or when they are embarking or disembarking the aircraft. It lists appropriate circumstances for requiring clearance as being when a passenger:

- has a communicable disease
- has a condition which may affect the safety, health, or comfort of other passengers
- has a condition which could be a hazard to safety of the flight or punctuality
- would require medical or special attention during the flight
- could aggravate an existing medical condition.

The CAA's view is that this list is reasonable and proportionate and non-IATA airlines should base their processes around similar criteria.

70. The CAA recommends use of passenger profiles for passengers with permanent disabilities or medical conditions to store information to avoid the need for passengers to complete forms for each journey, subject to data protection laws.

Proposed criteria to achieve specific ratings:

To achieve a 'Good' rating, airlines must achieve the following:

- Have no limit for numbers of passengers requesting assistance unless for reasons set out in UK Regulation (EC) No 1107/2006.
- Have medical clearance processes that are reasonable and proportionate, in line with the expectations set out in this CAA guidance.

To achieve a 'Very Good' rating, an airline must achieve all the measures set out in 'Good' and additionally meet the following measures:

- Store information on medical clearance in passenger profiles, subject to data protection laws.

- Q9. Are the proposed criteria to achieve a ‘Good’ and ‘Very Good’ assessment level in relation to access and medical clearance appropriate? Should the CAA consider setting the standards at a different level (please explain your rationale)?**
- Q10. Is there anything additional that the CAA should consider to allow people to be confident they will not be denied boarding because of their disability or reduced mobility?**
- Q11. Do you agree with the criteria set out by IATA under Resolution 700? What could be additional criteria?**

Accompanying persons

71. All airlines surveyed, through our questionnaire, have extensive processes for determining if a passenger can travel alone, or for safety reasons needs to be accompanied so that they can make their way to an emergency exit unaided in the case of an emergency. However, the processes differ amongst the carriers we surveyed. Disability stakeholders told us the information requested can also differ between carriers which may cause confusion for passengers and possibly lead to passengers being refused travel at the airport without an accompanying person. We therefore consider that there is scope for airlines to improve processes further.
72. The CAA has received some complaints from consumers about not being able to travel without an accompanying person/carer. These complaints were from passengers who were able to travel without an accompanying person with one or more carriers but were advised they required an accompanying person by another carrier. Generally, airline staff at one airline had determined that the passengers would not be able to make their way to an emergency exit unaided and refused bookings, although the passengers had travelled with other airlines previously. With many of these complaints, following further investigation and intervention by us, the passengers were able to travel alone following individual risk assessments. Similarly, we have received complaints about passengers not being able to use supplementary seating or not having their seating requests fulfilled. Again, following investigations these passengers were generally accepted for travel. Our view is that some airlines are not doing enough to ensure that their processes are sufficiently robust to ensure that fair and proportionate decisions are being made on access to air travel for individual passengers with complex needs.
73. Through our research we identified that 11 airlines said that they use ICAO industry guidance to determine if an accompanying person is required to enable a disabled person or person with reduced mobility to travel. The remaining airline said that they rely on the NHS to make a recommendation.

74. Some carriers also said that they allow the use of “safety assistants”. These assistants can be another person that is travelling on the same flight but do not have to be a friend, family, or carer of the passenger.
75. With respect to offering discounted fares to accompanying passengers, in their response to our questionnaire:
- seven airlines said that they do not offer discounts to accompanying persons;
 - two airlines offer a discount if they have determined that the passenger requires an accompanying person;
 - one airline offers a discount on some routes only (due to local legislation); and
 - two airlines did not clarify their policy.
76. Below is the proposed text for the guidance document on accompanying persons including proposed criteria on assessments of airline policies and practices in this area.

Accompanying persons

77. UK Regulation (EC) No 1107/2006 allows for an airline to require a disabled person or person with reduced mobility to be accompanied by another person who can provide the assistance required by that person if this is necessary to meet applicable safety requirements, for UK airlines, as set out under UK Regulation 965/2012 (Air Operations), and for foreign airlines local safety rules provides requirements and guidance. The CAA's view is that sitting an accompanying person next to the person best meets these requirements.
78. Carriers should have processes that are reasonable and proportionate, in line with the safety regulation guidance. The process should be published on the airline's website.
79. ECAC Doc 30 encourages airlines to 'offer discounts for the carriage of the accompanying person'...if the airline 'considers the presence of such a person necessary for safety reasons.' CAP2241 question 5b also recommends that tickets for accompanying persons should be offered for free or at a significantly discounted rate when the airline requires an accompanying person for safety reasons.
80. The CAA's view is that it is best practice to offer free or significantly discounted rates for accompanying persons necessary for safety reasons.

Proposed criteria to achieve specific ratings:

To achieve a 'Good' rating, airlines must achieve the following:

- Have published processes that are reasonable and proportionate, in line with the safety regulation guidance.

To achieve a 'Very Good' rating, an airline must achieve the measure set out in 'Good' and additionally meet the following measure:

- Offer discounted rates for accompanying persons when required for safety reasons.

Q12. Are the proposed criteria to achieve a 'Good' and 'Very Good' assessment level in relation to accompanying persons appropriate? Should the CAA consider setting the standards at a different level (please explain your rationale)?

Q13. Do you have any comments on airline policies on the need for accompanying persons for passengers who are not self-reliant?

Chapter 4

At the airport

Checking-in

81. We carried out observations at three airports, where in person check-in was more common, across six airlines. We noted that most disabled and less mobile passengers approach special assistance before going to check-in and /or bag drop. Many passengers are then accompanied by airport staff. For these people and those who are not accompanied, some airlines provide separate desks and / or queues for disabled and less mobile passengers at check-in and bag drop. These can be a helpful way to reduce the queuing time for those who are less able to stand for extended periods. However, in some cases these desks were not available. Where desks were not available, we interviewed staff about check-in procedures. We noted that some staff were not always aware of procedures for disabled and less mobile passengers and when we talked to staff about the location of the dedicated special assistance queues some staff said that these were unavailable.
82. Some staff we spoke to told us that if they see a passenger “in a wheelchair” they will prioritise them. In our view it is not obvious to us that all check-in staff are adequately trained to identify passengers who may require special assistance desks and / or queues, especially during busy periods and particularly if the person has a non-visible disability.
83. Because, through our research, it was not easy to identify obvious examples of best practice, we propose to not have a ‘very good’ category initially but develop criteria for ‘very good’ in due course. We will work with stakeholders to develop best practice.
84. Below is the proposed text for the guidance document on checking-in, including a proposed criterion on assessments of airline policies and practices in this area.

Checking-in

85. The responsibility for providing assistance around the airport, including to the check-in and bag drop facilities, lies with airports. However, there remain some important roles for airlines at this stage of the passenger journey for disabled persons and less mobile passengers.
86. At airports, queues of passengers can form for check-in and bag drop counters. The CAA's view is airlines should ensure that disabled persons and persons with reduced mobility are able to access check-in and bag drop facilities. This may be achieved by allocating a desk(s) for special assistance passengers and / or prioritising check-in assistance and / or proactive queue combing of long queues. The ICAO Manual states that 'Airport and aircraft operators should provide assistance to persons with disabilities at check-in counters. Check-in staff should be given appropriate training to handle requests from, and respond to the needs of, persons with disabilities'. It further states that 'Airport and aircraft operators should ensure that automated check-in machines or kiosks under their control are accessible and identified with the universal symbol of accessibility' and if they 'cannot be made accessible, then an equivalent level of service should be provided to those persons who are unable to use them independently'.
87. IATA's IPAOM recommends airlines verify with passengers in person that the information they hold is accurate, including the IATA code and make updates if it is not, or extra information is needed. (Where the passenger is assisted by the airport before check-in it is assumed the airport, or its contracted provider, will do this).
88. EC Interpretive Guidelines Q10 recommends that, unless prevented for safety reasons, passengers should be able to use personal equipment through the airport until the gate both for embarkation and disembarkation. It is important that airline staff provide passengers with the option to choose to either check-in mobility equipment or to use it through the airport.

Proposed criterion to achieve specific ratings:

To achieve a 'Good' rating, airlines must achieve the following:

- Have a separate check-in desk or alternative method of assisting disabled and less mobile persons at check-in.

Q14. Is the proposed criterion to achieve a 'Good' assessment level in relation to checking in appropriate? Should the CAA consider more criteria? If so, what criteria?

Boarding and disembarking

89. In the CAA's questionnaire all 12 airlines confirmed they have processes in place to offer to pre-board disabled persons or persons with reduced mobility. For the 27 flights we observed across 15 airlines, all invited disabled and less mobile passengers to pre-board, although we noted that on occasion because of delays to assistance services by airports, some disabled and less mobile passengers were boarded after other passengers. Disability stakeholders told us that pre-boarding is especially important as it is safer and more dignified and they told us that, in their experience, it often is not possible. Disability stakeholders also added that often they were boarded after passengers who had paid for expedited assistance, even if this was high numbers of passengers.
90. During the CAA's monitoring of boarding procedures at UK airports, we observed that some disabled passengers were confused about boarding procedures, especially those with non-visible disabilities (for example, where to queue and when to approach the desk at the gate). It is our view that more information as well as clear communication at the airport would improve this process.
91. Disability stakeholders suggested that airlines develop queue combing processes at boarding and one or more airline agents should make their way through the queue and approach those passengers who need assistance. Another suggestion was to have a handover procedure in place at disembarkation so that crew liaise with assistance agents to ensure the safe disembarkation process of assisted passengers. During our observations at airports, we noted that passengers' interests were not always, in our view, fully considered during the disembarking process, particularly set against the urgency of meeting airline turnaround times. For example, we noted that passengers were sometimes encouraged to walk off aircraft rather than wait for assistance. With one airline we noted that crew sometimes provided the assistance.
92. In addition, the CAA observed that depending on the airport and airline computer system, ground staff could not always see all the special assistance requests or free text notes. It is the CAA's view that being able to access this information can help staff to ensure that consumers receive the appropriate assistance.
93. Because, through our research, it was not easy to identify obvious examples of best practice, we propose to not have a 'very good' category initially but develop criteria for 'very good' in due course. We will work with stakeholders to develop best practice.

94. Below is the proposed text for the guidance document on boarding and disembarking, including proposed criteria on assessments of airline policies and practices in this area.

Boarding and disembarking

95. Paragraph 7.3 of the ICAO Manual states that ‘Persons with disabilities who self-identify as needing assistance or additional time should be offered the opportunity to separately pre-board (i.e. prior to all other passengers) and disembark (i.e. before or after all other passengers), as this is generally more dignified and less stressful for the person and more efficient for the aircraft operator.’ It is the CAA’s view that operators should make announcements about pre-boarding (gate staff) and disembarking (crew), inviting those passengers that have booked assistance to board or disembark first or remain on the aircraft until all other passengers have disembarked. The CAA’s view is that this should include being before general passengers who have paid for expedited boarding. This is subject to passengers being at the gate in time for pre-boarding and any safety considerations. Airports and airlines should work together to try to ensure that disabled and less mobile passengers are at the gate ready for pre-boarding. For those that have not booked assistance, reasonable efforts should be made. Whilst these offers for separate boarding and disembarkation should be made, ultimately it should be the passenger’s choice when they board, subject to safety considerations.
96. It is the CAA’s view that airlines should provide alternative embarkation processes for disabled and less mobile passengers if the processes generally used are inaccessible as it may not always be reasonable to expect passengers to request assistance for embarkation and disembarkation. Not all passengers would want a separate boarding experience (e.g. through an ambulift); or a passenger may not be aware that they need assistance until they experience difficulties such as when an airline requires passengers to queue for long periods, or in cramped airport spaces. The CAA strongly encourages airlines to promote independence for passengers (and to promote effective airport assistance operations). Airlines, in co-operation with airports, should seek to implement operational procedures that lessen the impact on disabled and less mobile passengers in these situations. This might include allowing passengers to be seated in gate areas until their allocated boarding time. The CAA acknowledges that providing such options for passengers is dependent on airport infrastructure.
97. It is the CAA’s view that airlines should develop queue combing processes at boarding. Agents should make their way through the queue and approach those passengers who appear to need assistance.
98. Airlines should instruct crew to facilitate assistance for boarding and disembarking where appropriate. The CAA’s view is that a handover procedure in place at disembarkation to ensure crew liaise with assistance agents to ensure the safe disembarkation process of assisted passengers.

99. Cabin crew should not provide assistance to passengers who have requested assistance under UK Regulation (EC) No 1107/2006.

Proposed criteria to achieve specific ratings:

To achieve a 'Good' rating, airlines must achieve the following:

- Evidence of general operational procedures that provide opportunities for pre-notified disabled and less mobile persons to separately pre-board (i.e. prior to all other passengers and subject to passengers being at the gate on time for pre-boarding) and disembark (i.e. before or after all other passengers).
- Make announcements inviting disabled and less mobile persons to pre-board if they wish to do so.
- Have a handover procedure in place at disembarkation for crew to liaise with assistance agents to ensure the safe disembarkation process of disabled and less mobile passengers.

Q15. Are the proposed criteria to achieve a 'Good' assessment level in relation to boarding and disembarking appropriate? Should the CAA consider more criteria? If so, what criteria?

Chapter 5

During the Journey

Onboard facilities

Seating

100. In the CAA's questionnaire all 12 airlines confirmed that they offer seat allocation free of charge to disabled and less mobile persons. All airlines allowed assistance to be requested by phone and said that a person with specialist knowledge would ask about the consumer's specific needs and book the appropriate seat for them. Four airlines offered the option to have their seats allocated online. The CAA's view is that it is best practice for airlines to offer a few options for disabled and less mobile persons to book their seats. In addition, we consider that when determining which seat best meets the disabled or less mobile person's needs it is beneficial for passengers to have the option to view the cabin layout and be able to determine how much legroom seats have, if the armrests are moveable, and the distance to the nearest toilet.
101. Disability stakeholders told us that being able to move easily into seats (with help from airport assistance staff, if necessary) is important for disabled and less mobile passengers. Often armrests that cannot move can make it difficult for some passengers to access some seats. However, our research showed a mix of responses from airlines to our question about armrests. Out of the 12 airlines surveyed, eight airlines said that over 50% of their seats have moveable armrests on all aircrafts. Out of the remaining airlines two were unable to confirm this information, one air carrier said that all aisle seats have moveable armrests and one carrier who operates a mixed fleet said that on two of their aircraft types all rows have moveable armrests and on the other two only a limited number of rows have moveable armrests.
102. Complaints and enquiries to the CAA have also identified inconsistencies in how airlines interpret safety rules regarding seating of disabled passengers. We have noted that some airlines allow passengers to sit in an aisle seat (which, for the reasons set out above, is often the passenger's preference) whilst others do not allow it. Airlines must do more to ensure that processes are used that adequately considers passengers' rights, balanced against safety considerations.
103. We asked airlines if they accepted supplementary seating such as harnesses but were disappointed that most respondents do not appear to have a set policy in this area, again creating uncertainty for passengers. The CAA has had some complaints from passengers who have had difficulty in establishing if their specific supplementary seating equipment is allowed. Following further

investigation and intervention by us, the passengers were able to travel alone following individual risk assessments. In our experience, there are very few instances where supplementary seating cannot be accommodated. We think this points to a lack of preparation by airlines for such enquiries. We would like airlines to have better processes for handling such enquiries.

104. Below is the proposed text for the guidance document on onboard facilities, including proposed criteria on assessments of airline policies and practices in this area.

Onboard facilities

Seat allocation

105. UK Regulation (EC) No 1107/2006 states that airlines should make 'all reasonable efforts to arrange seating to meet the needs of individuals with disability or reduced mobility on request and subject to safety requirements and availability'. Disabled and less mobile passengers should therefore have access to appropriate seating where this is available at the time of booking. It is the CAA's view that Article 4 of the Regulation should only be exercised if all reasonable options to provide access have been considered.
106. The ICAO Manual states that 'Aircraft operators should have seats which are designated as accessible for persons with disabilities. Aircraft operators may choose to block these seats until close to the time of departure and should ensure that they are the last seats assigned to other passengers. Seats should be reassigned, if necessary, to ensure that persons with disabilities have appropriate seating. Aircraft operators that charge for advanced seat selection should waive the charge for a person with disabilities in order that the latter may select the seat that best meets his or her needs'. It goes on to add: 'When a person identifies the nature of his or her disability, the aircraft operator should, before assigning that passenger a seat, inform the passenger of those available seats that are most accessible and then establish with that passenger an appropriate seat assignment'.
107. Disabled and persons with reduced mobility should not be charged a fee for access to an 'appropriate' seat. However, CAP2241 states that there is no obligation on airlines to upgrade passengers or offer additional seats for free.
108. Given that aircraft seating configurations vary significantly based on the type of aircraft and the fact that the needs of individuals can vary, what is 'reasonable' or what is 'appropriate' seating can only be decided by a carrier on a case-by-case basis. However, it is the CAA's view that airlines should have in place fair and transparent procedures to make assessments. The CAA proposes that procedures should be incorporated into the booking process for passengers, either automatically or through contact with airline call centres. The process should be accessible, with in person conversations always available to a passenger should they be required. An airline should publish the process for requesting an 'appropriate' seat on its website. It should also publish information on the accessibility of seats by showing on seat maps where toilets and exits are located, which seats have moveable armrests and which seats have extra legroom.
109. For many passengers with limited mobility or a disability, occupying an aisle seat is preferable to a window or middle seat because of the difficulty in accessing

seat rows. The CAA proposes that airlines should therefore seat passengers with low levels of mobility in aisle seats unless there is a safety reason not to do so. For UK airlines, UK Regulation 965/2012 (Air Operations) provides requirements and guidance on carriage of special categories of passengers and for foreign airlines local safety rules provides requirements and guidance.

110. Annex 5-F paragraph 4.9 of ECAC Doc 30 provides additional advice to airlines about seating passengers in aisle seats. Where the airline considers that seating a passenger with low levels of mobility creates a safety issue for those seated in the middle or window seat next to that passenger, then it should seat the passenger in an aisle seat as requested but leave the middle and window seats empty in order to meet safety rules.
111. ECAC Doc 30 Annex 5-F 6.1 further sets out that disabled and less mobile passengers should not be seated on the top deck of a multi-deck aircraft if they are unable to negotiate steps, where the aircraft exits are not certified for emergency evacuations on both land and water.
112. Paragraph 8.8 of the ICAO Manual lists operational examples that airlines might incorporate into their procedures when considering seat allocation for disabled and less mobile passengers. This suggests assigning seats with, for example: a moveable armrest for passengers that cannot easily access seats; additional legroom for a passenger who cannot bend their leg; and close to a toilet or exit for a passenger with limited mobility. ECAC Doc 30 Annex 5-F 6.2 provides further examples.
113. Consideration should also be given to passengers with non-visible disabilities. CAP1603 states that because people with non-visible disabilities 'are diverse, airlines should adapt their seating policies to incorporate such requests (for example, a person might need to sit near a window to ease anxiety and stress)'. A person with a non-visible disability who travels without an accompanying person should be allocated seats so that visual and audible communication can be established with the cabin crew (ECAC Doc 30 Annex 5-F section 6.2c).
114. It is the CAA's view that a policy based on examples listed in the documents set out above will help deliver a performance that meets obligations under UK Regulation (EC) No 1107/2006.

Armrests

115. Some disabled and less mobile passengers are not able to easily transfer over a fixed armrest. Although UK Regulation (EC) No 1107/2006 does not include obligations in this respect, ECAC Doc 30 recommends at 5.3.3.1 that 'in aircraft with 30 or more seats, 50% of all aisle seats should have moveable armrests.' Airlines should provide information on which seats have moveable armrests on website seat maps.

Seating for an accompanying person

116. UK Regulation (EC) No 1107/2006 sets out 'Where a disabled person or person with reduced mobility is assisted by an accompanying person, the air carrier will make all reasonable efforts to give such person a seat next to the disabled person or person with reduced mobility.' The CAA's view is that this applies even if this means moving other passengers and compensating them if necessary.
117. ECAC Doc 30 Annex 5-F 6.1 further sets out that disabled and less mobile passengers travelling with an accompanying person should be sat next to that accompanying person.

Supplementary seating

118. It is the CAA's view that, in line with UK Regulation (EC) No 1107/2006, unless for reasons of safety or security, airlines should accommodate all requests for supplementary seats or harnesses. For UK airlines, UK Regulation 965/2012 (Air Operations) provides requirements and guidance on carriage of special categories of passengers and for foreign airlines local safety rules provides requirements and guidance. The CAA proposes that it is best practice for airlines to provide some equipment to be used either through permanent storage on aircraft or on request.

Proposed criteria to achieve specific ratings:

To achieve a 'Good' rating, airlines must achieve the following:

- Have published processes that ensure reasonable efforts to arrange seating to meet the needs of disabled and less mobile persons on request, subject to safety requirements and availability.
- Have processes that ensure reasonable efforts to seat accompanying person next to disabled and less mobile persons.
- Accommodate all requests for supplementary seats or harnesses unless for reasons of safety or security.
- Seat disabled and less mobile passengers with low levels of mobility in aisle seats unless there is a safety reason (which cannot be overcome by leaving inside seats empty).

To achieve a 'Very Good' rating, an airline must achieve all the measures set out in 'Good' and additionally meet the following measure:

- Have moveable armrests (for aircraft with 30 or more seats) on 50% of aisle seats.

Q16. Are the proposed criteria to achieve a ‘Good’ and ‘Very Good’ assessment level in relation to seating appropriate? Should the CAA consider setting the standards at a different level (please explain your rationale)?

Access to toilets

119. Nine airlines responded to the CAA’s questionnaire that staff will help disabled persons in reaching the toilet when onboard the aircraft. Of the remaining carriers one said that cabin crew will not assist disabled persons to the toilet and two airlines said that they would assist the passenger to the toilet but will not provide an onboard wheelchair, even if this is requested by the passenger. It is not clear how these three airlines can meet their obligations to assist passengers to the toilet without an onboard wheelchair, especially as our experience is that airlines direct crew not to manually assist passengers to the toilet.
120. Our view is that although we cannot mandate what form the assistance should take, we do not see non-compliance as an option for airlines. Therefore, on the balance of the risks associated with different approaches to meeting this obligation, for an aircraft where it is possible for an onboard wheelchair to be used, this should be available for the passenger to use.
121. Although we recognise that airline toilets have become more accessible in recent years, the responses to our questionnaire show that the accessibility of toilets on various aircrafts varies, dependent on the size of aircraft. For example, twin aisles are more likely to have two toilets that can connect to become one large one so a passenger using an onboard wheelchair can use it.
122. Below is the proposed text for the guidance document on access to toilets, including proposed criteria on assessments of airline policies and practices in this area.

Access to toilets

123. It is important that disabled and less mobile passengers can access toilet facilities. The ICAO Manual states that 'where aircraft type, size and configuration permit, at least one washroom should be accessible to persons with disabilities, including tactile signage, colour contrasting and ease of use of handles, faucets and other controls'. Further guidance is also provided for aircraft whose size permits an on-board wheelchair. However, on some aircraft, space constraints can impact the accessibility of toilets. ECAC Doc 30 paragraph 5.3.3.1 provides guidance for different types of new or newly refurbished aircraft. It states that 'Aircraft with more than one aisle should be equipped with at least one spacious lavatory [for disabled passengers] catering for all kinds of disabilities. Any other aircraft equipped with at least two lavatories should have at least one catering for the special needs of [disabled passengers].'
124. Annex II of UK Regulation (EC) No 1107/2006 requires airlines to provide 'assistance in moving to toilet facilities if required'.
125. ECAC Doc 30 paragraph 5.3.3.1 states that new or refurbished:
- 'aircraft of 100 or more seats should have at least one onboard wheelchair: and
 - aircraft of 60 or more seats with [an accessible] lavatory should carry at least one on-board wheelchair available on any flight;
 - aircraft of 60 or more seats not yet equipped with [an accessible] lavatory should carry an onboard wheelchair where this is requested at least 48 hours prior to departure;
 - if an onboard wheelchair is available, this should be easily accessible for any passenger in need of it during the flight.'
126. The ICAO Manual makes a distinction that those aircraft with accessible toilets should have an onboard wheelchair and for those that do not, one should be requested.
127. The CAA considers that to comply with the UK Regulation (EC) No 1107/2006 requirement to assist passengers in moving to the toilet, airlines should follow the recommendations of both organisations. The CAA's view is that UK Regulation (EC) No 1107/2006 requires airlines to provide some form of assistance to help disabled and less mobile persons to and from the toilet. In practice, this means that airlines either must provide onboard wheelchairs or that their staff must assist passengers manually. Manual assistance increases the level of risks related to health and safety and the well-being of staff and passengers. On the balance of the risks, the CAA's view is that onboard wheelchairs should be made available.

Proposed criteria to achieve specific ratings:

To achieve a 'Good' rating, airlines must achieve the following:

- Have onboard wheelchairs as standard or on request or a reasonable alternative to assist disabled and less mobile passengers to the toilet that does not impact the health and safety of crew or passengers.

To achieve a 'Very Good' rating, an airline must achieve the measure set out in 'Good' and additionally meet the following measures:

- Have onboard wheelchairs as standard on all aircraft of 60 or more seats.
- At least one accessible toilet on all aircraft with more than one aisle.

Q17. Are the proposed criteria to achieve a ‘Good’ and ‘Very Good’ assessment level in relation to access to toilet facilities appropriate? Should the CAA consider setting the standards at a different level (please explain your rationale)?

Storage of manual wheelchairs onboard

128. In response to the CAA’s questionnaire, 11 airlines said they would allow smaller mobility equipment to be taken onboard but that this would depend on the size of the equipment. One airline did not indicate their policy.
129. We noted that some airlines said that the dimensions of the foldable equipment cannot exceed hand baggage dimensions and one carrier said that they have a dedicated onboard wheelchair stowage area.
130. Below is the proposed text for the guidance document on storage of manual wheelchairs onboard, including proposed criterion on assessments of airline policies and practices in this area.

Storage of manual wheelchairs onboard

131. ECAC Doc 30 Section 5.3.3.1f states that new or newly refurbished ‘aircraft of 100 or more seats should have a priority space in the cabin, designated for storage of at least one vertically folding personal wheelchair not exceeding ISO dimensions.’

Proposed criterion to achieve specific ratings:

To achieve a ‘Very Good’ rating, an airline must meet the following measure:

- Provide storage for at least one vertically folding personal wheelchair not exceeding ISO dimensions for aircraft of 100 or more seats on a first come first served basis.

Q18. Is the proposed criterion to achieve a 'Very Good' assessment level in relation to the storage of manual wheelchairs onboard appropriate? Should the CAA consider more criteria? If so, what criteria?

Q19. Does the criterion adequately consider commercial considerations for airlines?

Carriage of mobility and medical equipment

132. In the questionnaire all 12 airlines said that passengers can carry at least two pieces of mobility equipment free of charge, two carriers advised that this number is unlimited, and one carrier said that this is unlimited on routes to and from the US in line with US legislation. Two airlines said that they will allow more than two pieces on a case-by-case basis.
133. The CAA has received complaints from passengers about damage to mobility equipment, in particular electric mobility aids. It recognises the significant impact this has on individuals, who are reliant on their equipment. Although UK Regulation (EC) No 1107/2006 requires airports to ground handle mobility equipment, we recognise that because of practical considerations airports often discharge some of this obligation to airlines, or third-party airline contractors, under local agreements. We are therefore pleased to note the recent publication of IATA's 'Guidance on the transport of mobility aids' which seeks to improve the handling of mobility aids.
134. There was a wide range of responses to the questionnaire on oxygen with some supplying it and others not. Costs for oxygen varied. It was not clear from the responses what policies were on passengers bringing their own oxygen concentrators onboard with them.
135. Below is the proposed text for the guidance document on carriage of mobility and medical equipment, including proposed criteria on assessments of airline policies and practices in this area.

Carriage of mobility and medical equipment

136. UK Regulation (EC) No 1107/2006 obliges airlines to transport, 'in addition to medical equipment, up to two pieces of mobility equipment [without charge] per disabled person or person with reduced mobility, including electric wheelchairs (subject to advance warning of 48 hours and to possible limitations of space on board aircraft, and subject to the application of relevant legislation concerning dangerous goods)'.
137. There is no clear definition of 'mobility equipment' in UK Regulation (EC) No 1107/2006. However, CAP2241 question 19 states that 'it can be defined as any equipment the purpose of which is to provide mobility to disabled and persons with reduced mobility or assist them in their mobility.'
138. Limitations of space on board an aircraft may impact an airline's ability to transport mobility equipment. The CAA's view is that mobility equipment should be carried if there is sufficient space onboard at the time the reservation is made, having considered the booked quantity of baggage and cargo at that time. It is not acceptable for airlines to arbitrarily set limits on the number of mobility items it can carry per aircraft for commercial or practical reasons.
139. UK Regulation (EC) No 1107/2006 does not include limitations on medical equipment (including oxygen). CAP2241 states that airlines should look at each request for medical equipment on a case-by-case basis and, if it is accepted for carriage, extra baggage charges (if applicable) should not be imposed on medical equipment. Although there is no equivalent guidance for mobility equipment, the CAA strongly recommends that mobility equipment should not count towards a person's cabin baggage allowance.
140. Airlines should allow passengers to carry oxygen in the cabin free of charge, subject to safety restrictions. Where airlines provide oxygen, CAP2241 Q4b recommends that this is provided at a discounted rate.
141. CAP2241 Q10 recommends that, unless subject to safety reasons, airlines should allow passengers to be able to use personal equipment through the airport until the gate both for embarkation and disembarkation. If practical, the carrier should ensure that the mobility equipment is available at the gate or aircraft side. This means the equipment should be labelled as either being returned to the passenger at this point or, if the passenger prefers, at baggage reclaim. Airlines should ask passengers for their preference during the booking process.
142. UK Regulation (EC) No 1107/2006 requires airports to ground handle mobility equipment. To help ensure this is done in an efficient and passenger focussed manner, and to help ensure airlines meet their own obligations regarding safe transport of mobility equipment, there are a number of actions airlines can take.

143. The CAA's view is that following IATA's 'Guidance on the transport of mobility aids'⁹ will help airlines and airports fulfil their obligations, drive process improvements, and develop best practice.

Proposed criteria to achieve specific ratings:

To achieve a 'Good' rating, airlines must achieve the following:

- Allow two pieces of mobility equipment per person, free of charge, in addition to medical equipment subject to advance warning of 48 hours and limitations of space on board the aircraft.
- Have processes to ensure mobility equipment is returned to the passenger at aircraft side (if the passenger wishes).
- Show evidence of working towards achieving best practice systems and processes, particularly regarding IATA's 'Guidance on the transport of mobility aids'.

To achieve a 'Very Good' rating, an airline must achieve all the measures set out in 'Good' and additionally meet the following measure:

- Not count mobility and medical equipment in cabin baggage towards a person's cabin baggage allowance.

⁹ [Guidance on the Transport of Mobility Aids \(iata.org\)](https://www.iata.org/en/pressroom/2019/01/20190101-01)

- Q20. Are the proposed criteria to achieve a ‘Good’ and ‘Very Good’ assessment level in relation to the carriage of mobility and medical equipment appropriate? Should the CAA consider setting the standards at a different level (please explain your rationale)?**
- Q21. Do the criteria adequately consider commercial considerations for airlines?**
- Q22. Do you agree that IATA’s ‘Guidance on the transport of mobility aids’ provides an appropriate level of guidance on safe transport of mobility aids?**
- Q23. Over-arching onboard facilities question: Has the CAA correctly identified the current issues regarding onboard facilities? Are there additional issues which should be considered? Are the proposals practical and appropriate?**

Assistance dogs

144. Under UK Regulation (EC) No 1107/2006, it is the responsibility of airports to facilitate the handling of 'recognised assistance dogs' through the airport. Further, it is the responsibility of airlines to carry 'recognised assistance dogs' in the cabin. Neither of the terms 'recognised assistance dog' or 'assistance dog' are defined in the Regulation. A definition of a recognised assistance dog was previously included in ECAC Doc 30 Section 5, which defined it as a dog that has been trained to assist a disabled person by an organisation that is a member of Assistance Dogs International (ADI) and/or the International Guide Dog Federation (IGDF). This definition was referenced in the CAA's Safety Notice SN-2015/001 on the Carriage of Assistance Dogs in the Aircraft Cabin (issued 20 May 2015). However, the definition of a recognised assistance dog has since been removed from ECAC Doc 30 Section 5 and the CAA's Safety Notice regarding the carriage of recognised assistance dogs was withdrawn altogether in April 2018. It is the CAA's understanding that the definition was removed at the request of other ECAC members that did not consider it to be compatible with their domestic arrangements. In the absence of further guidance, airlines are required to perform a case-by-case assessment on whether an assistance dog should be considered to be a recognised assistance dog.
145. Although not many in number, since the removal of the previous definition from ECAC Doc 30, the CAA has been advised of occasions where disabled passengers with non-ADI/IGDF trained assistance dogs have been refused travel by an airline. Similarly, on a number of occasions airlines have raised with the CAA the difficulty of assessing assistance dogs on a case-by-case basis in the absence of any guidance on what the term 'recognised' means in practice. Given this lack of clarity and the impact it is having on certain stakeholders, in particular assistance dog users and airlines, on 29 October 2019 the CAA

launched a Call for Evidence¹⁰ regarding the carriage of assistance dogs by air. We wanted to better understand the issues faced by assistance dog users, airlines and airports in relation to the carriage of their assistance dogs by air. More information on the responses can be found at Annex 1.

146. In terms of UK law, under the Equality Act an ‘assistance dog’ is defined as a dog trained to guide a blind person or to assist a deaf person, or a dog which has been trained by a prescribed charity to assist a disabled person with a particular type of disability or a dog of a prescribed category which has been trained to assist a disabled person who has another type of disability. Although this definition is provided in the context of accessing taxis and private hire vehicles, our view is that it is useful guide for the types of dogs that should be considered to be an ‘assistance dog’.
147. The Equality and Human Rights Commission provides a guide for businesses on assistance dogs to assist businesses to understand what they can do to comply with their legal duties under the Equality Act. The guide states that assistance dogs help not only blind people, but they are ‘trained to help people with hearing difficulties, epilepsy, diabetes, physical mobility problems and more’. Further, the guide states that assistance dogs ‘carry out a variety of practical tasks for people as well as supporting their independence and confidence’. Finally, the guide makes clear that assistance dogs ‘are not pets and are treated as ‘auxiliary aids’.
148. In the CAA’s view, therefore, it is clear that the Equality Act’s meaning of an assistance dog is not intended to cover pet dogs, whether the owner of the dog has a disability or not. It is also not intended to include emotional support dogs. Rather, the role of an assistance dog is to assist the disabled person in carrying out their normal daily activities.
149. Since the publication of our Call for Evidence, we have noted that a charity, the Assistance Dogs Assessment Association¹¹ (ADAA), specialising in assessments of owner trained dogs has been set up. We have had discussions with the ADAA and consider that it will provide an acceptable alternative for those people who train their own dogs to provide reassurance to airlines of their needs and how the dog assists them in carrying out tasks for them and the standard of training carried out.
150. Because, through our research, it was not easy to identify obvious examples of best practice, we propose to not have a ‘very good’ category initially but develop criteria for ‘very good’ in due course. We will work with stakeholders to develop best practice.

¹⁰ [CAP1851 Assistance Dogs Call For Evidence](#)

¹¹ [Assistance Dog Assessment Association | ADAA \(theadaa.org\)](#)

151. Below is the proposed text for the guidance document on assistance dogs, including proposed criteria on assessments of airline policies and practices in this area.

Assistance dogs

152. Under UK Regulation (EC) No 1107/2006 airlines must accept 'recognised assistance dogs' in the cabin, subject to national regulations. 'Where use of a recognised assistance dog is required, this shall be accommodated provided that notification of the same is made... in accordance with applicable national rules covering the carriage of assistance dogs on board aircraft, where such rules exist'.
153. UK Regulation (EC) No 1107/2006 does not define a 'recognised assistance dog'. However, the CAA's view is that a recognised assistance dog is one that has been trained to assist a disabled person either by carrying out tasks on behalf of the owner or performing functions that address the needs of a disabled person arising out of their disability. This does not include dogs that solely provide emotional support. This definition accords with the definition of assistance dog set out in the Equality Act. The CAA's view is that this is limited to the following assistance 'types':
- Autism assistance dogs
 - Guide dogs
 - Hearing dogs
 - Medical alert assistance dogs
 - Physical disabilities assistance dogs
 - PTSD assistance dogs
- or
- any other dog which has been trained to carry out tasks on behalf of the owner or performing functions that address the needs of a disabled person arising out of their disability.
154. It is the CAA's view that airlines should accept an assistance dog in the cabin on request by a disabled person if it meets at least one of the 'types' above and meets minimum training standards.
155. The CAA's view is that minimum training standards are deemed to have been met if the assistance dog has:
- been trained by an accredited member organisation of Assistance Dogs International (ADI) and the International Guide Dog Federation (IGDF);
 - been trained by a candidate organisation of Assistance Dogs UK (ADUK) or ADI Europe (ADEu);

- received accreditation from the Assistance Dogs Assessment Association (ADAA); or
 - dogs that are trained to the same or higher standard as those set out by the organisations mentioned above, if evidence of training can be provided.
156. Owners travelling with their assistance dogs that meet the criteria under paragraphs 153153 and 155155 should be required to provide the following documentation to the airline they are travelling with:
- Written confirmation from the dog owner/handler confirming the task(s) the assistance dog has been trained to perform to assist them with their disability. This can be a doctor's note or a signed self-declaration.
 - Evidence of having met the minimum training standards (likely to be certificates provided by ADI, IGDF, ADUK, ADEu, ADAA).
157. If an assistance dog requires an extra seat for safety reasons this should be provided for free. For UK airlines, UK Regulation 965/2012 (Air Operations) provides requirements and guidance on carriage of special categories of passengers and for foreign airlines local safety rules provides requirements and guidance. There is no obligation to provide an extra seat for free for comfort.

Proposed criteria to achieve specific ratings:

To achieve a 'Good' rating, airlines must achieve the following:

- Accept recognised assistance dogs in the cabin in line with this CAA guidance.
- Provide an additional seat for free if needed for safety reasons.

Q24. Do you agree with the definition of 'recognised assistance dog'?

Q25. Do you agree with the proposed documentation required to be accepted for travel?

Q26. Are there any other types of assistance dogs or other training standards that the CAA should consider adding to the list?

Q27. Are the proposed criteria to achieve a 'Good' and assessment level in relation to assistance dogs appropriate? Should the CAA consider more criteria? If so, what criteria?

Training

158. In our questionnaire, we asked for information on the training that staff undergo to best meet the needs of disabled persons. Although airlines have said that this is part of their overall training, we did not receive significant detail on training programmes. Therefore, we are unsure how in-depth this training is and whether airlines ensure that staff undergo refresher training on a regular basis.
159. Of the airlines that responded about the regularity of refresher training, five said they do it every three years and one said they do it every year. In addition, some airlines said that each main base has their own training providers and set training modules. This may indicate that not all airlines have complete oversight on the training that staff receive. Feedback from disability stakeholders was that airlines should have clear oversight of the training and ensure programmes are delivered through organisations or individuals who have lived experience.
160. Because, through our research, it was not easy to identify obvious examples of best practice, we propose to not have a 'very good' category initially but develop criteria for 'very good' in due course. We will work with stakeholders to develop best practice.
161. Below is the proposed text for the guidance document on training, including a proposed criterion on assessments of airline policies and practices in this area.

Training

162. UK Regulation (EC) No 1107/2006 has wide ranging obligations on airlines to provide training to its staff and sub-contracted staff so that they are able to provide a high-quality service to the airline customers. UK Regulation (EC) No 1107/2006 Article 11 sets out three obligations in respect of training:
- ‘Ensure that all their personnel, including those employed by any sub-contractor, providing direct assistance to disabled [and less mobile persons] have knowledge of how to meet the needs of persons having various disabilities or mobility impairments;’
 - ‘Provide disability-equality and disability-awareness training to all their personnel working at the airport who deal directly with the travelling public;’
 - ‘Ensure that, upon recruitment, all new employees attend disability related training and that personnel receive refresher training courses when appropriate.’
163. There is extensive guidance in ECAC Doc 30 Annex 5-F and 5-G on training requirements. It is the CAA’s view that following ECAC guidance will help deliver a performance that meets UK Regulation (EC) No 1107/2006.

Proposed criterion to achieve specific ratings:

To achieve a ‘Good’ rating, airlines must achieve the following:

- Have training programmes regarding content and frequency in line with ECAC Doc 30 annex 5-F and 5-G.

Q28. Do you agree that ECAC guidance is sufficiently extensive to help ensure adequate training? If not, what else should be included? Are there any examples of enhanced training programmes in other sectors that may be relevant to aviation?

Q29. Is the proposed criterion to achieve a 'Good' assessment level in relation to training appropriate? Should the CAA consider more criteria? If so, what criteria?

Assistance during flight disruption

164. In the questionnaire ten airlines said that they prioritise disabled persons and persons with reduced mobility when there is disruption to a flight. One airline was unclear about its procedure and one airline said that they are processed the same as other passengers but that staff have the capability to pull a list from the system with information on who may require assistance.
165. To identify passengers that may require help, airlines said that they would refer to the IATA codes associated with each passenger. Staff provide help by having conversations with passengers, in person if at the airport, or by phone if not at the airport, to determine their needs and to arrange appropriate accommodation (if necessary).
166. Airlines said that disabled, and less mobile passengers can make themselves known to staff at the airport and will be prioritised accordingly. However, respondents did not provide information on how they ensured this was carried out e.g. through operational directives to staff.
167. Because, through our research, it was not easy to identify obvious examples of best practice, we propose to not have a 'very good' category initially but develop criteria for 'very good' in due course. We will work with stakeholders to develop best practice.
168. Below is the proposed text for the guidance document on assistance during flight disruption, including a proposed criterion on assessments of airline policies and practices in this area.

Assistance during flight disruption

169. UK Regulation (EC) No 261/2004 Article 11.1 states that airlines 'shall give priority to carrying [disabled and less mobile persons] and any persons or certified service dogs accompanying them'. Further, 'In cases of denied boarding, cancellation and delays of any length, [disabled and less mobile persons] and any persons accompanying them... shall have the right to care in accordance with Article 9 of UK Regulation (EC) No 261/2004 as soon as possible.'
170. For people with non-visible disabilities, being denied boarding may cause confusion, anxiety, and distress. CAP1603 states that 'airlines should ensure that they have systems and processes in place to identify and prioritise to any disabled and less mobile persons, including anyone with an invisible disability, on the relevant flight'.
171. In the case of flight disruption, Article 9.3 of UK Regulation (EC) No 261/2004 states that airlines should 'pay particular attention to the needs of [disabled passengers, those with reduced mobility] and any person accompanying them' when providing care and assistance. Airlines should ensure that they have systems and processes, including operational manuals if appropriate, in place to identify and prioritise any disabled and less mobile persons and airlines should ensure that they proactively provide assistance that meets the needs of the individual concerned. This should include passengers, who make themselves known to the airline at the time of disruption (i.e. are not pre-notified). It may be preferable for disabled and less mobile passengers to return to familiar surroundings during the disruption (their home or, if they are away from home, the hotel they have been staying in).
172. Airports continue to have responsibility for providing assistance to disabled passengers at the airport under UK Regulation (EC) No 1107/2006.

Proposed criterion to achieve specific ratings:

To achieve a 'Good' rating, airlines must achieve the following:

- Have systems and processes to identify and prioritise any disabled and less mobile persons.

Q30. Is the proposed criterion to achieve a 'Good' assessment level in relation to assistance during flight disruption appropriate? Should the CAA consider more criteria? If so, what criteria?

Chapter 6

Post Journey

Complaint handling

173. Of the twelve airlines surveyed in the recent research, nine are signed up to a UK approved Alternative Dispute Resolution (ADR) provider. The CAA's view is that best practice is for airlines to use ADR for all escalated passenger complaints, not just for complaints about accessibility.
174. In its response to the 2021 Government Consultation Reforming Competition and Consumer Policy Driving growth and delivering competitive markets that work for consumers¹², the CAA reiterated its support for ADR in the aviation sector.
175. Below is the proposed text for the guidance document on assistance during complaint handling, including proposed criteria on assessments of airline policies and practices in this area.

¹² [CAP2269 CAA Response to BEIS RCCP Consultation CAP Format.pdf](#)

Complaint handling

176. UK Regulation (EC) No 1107/2006 states that ‘A disabled person or person with reduced mobility who considers that this Regulation has been infringed may bring the matter to the attention of the managing body of the airport or to the attention of the air carrier concerned.’
177. Airlines should have established procedures for handling complaints. Procedures should be accessible, including in person or over the telephone. Staff handling complaints should have expertise and ideally be part of a separate team specialising in accessibility matters.
178. UK Regulation (EC) No 1107/2006 further states that ‘If the disabled person or person with reduced mobility cannot obtain satisfaction in such way, complaints ... may be made to a body or bodies designated [in the Regulation]’ or to any other competent body designated [by the CAA] about an infringement of this Regulation.’
179. The CAA encourages all airlines to become members of an Alternative Dispute Resolution Scheme (ADR) approved by the CAA. Where an airline is a member of such a scheme, all complainants to airlines in respect of provisions under UK Regulation (EC) No 1107/2006 must, alongside the airline’s response to a complaint, be informed of their right to escalate their complaint to the relevant ADR scheme. In the case of an airline not being a member of an ADR scheme, the complainant must be informed of their right to escalate their complaint to the CAA’s Passenger Advice and Complaints Team.

Proposed criteria to achieve specific ratings:

To achieve a ‘Good’ rating, airlines must achieve the following:

- Have an accessible and appropriately resourced complaints handling process.
- Be informed of the right to escalate their complaint to the relevant ADR scheme or the CAA’s Passenger Advice and Complaints Team, as appropriate.

To achieve a ‘Very Good’ rating, an airline must achieve all the measures set out in ‘Good’ and additionally meet the following measure:

- Be members of a UK CAA approved alternative dispute resolution body.

Q31. Are the proposed criteria to achieve a ‘Good’ and ‘Very Good’ assessment level in relation to complaint handling appropriate? Should the CAA consider setting the standards at a different level (please explain your rationale)?

Compensation for lost, delayed, and damaged mobility equipment

180. Under international law, the Montreal and Warsaw Conventions, airlines liability is limited for loss, damage, or delay to baggage. This includes all mobility equipment. In our research eight airlines said that they do not limit claims to the Montreal Convention. However, during our desktop research we noted that most of these airlines do not clearly state their policy on their website. Some of the reasons stated by carriers were that each case is assessed on a case-by-case basis and to discourage fraudulent claims. There is also the option for airlines to sign a special declaration. However, our research has identified that this declaration can be a significant cost to passengers, sometimes 5-10% of the cost of the mobility aid.
181. Disability stakeholders suggested that a reporting process for lost, delayed and damaged mobility equipment should be used by airlines. This would help hold airlines to account. We did not ask airlines for details on this during the research but, if practical, we may introduce obligations on reporting lost, delayed and damaged mobility equipment in future criteria.
182. Because, through our research, it was not easy to identify obvious examples of best practice, we propose to not have a ‘very good’ category initially but develop criteria for ‘very good’ in due course. We will work with stakeholders to develop best practice.
183. Below is the proposed text for the guidance document on compensation for lost, delayed and damaged mobility equipment, including proposed criteria on assessments of airline policies and practices in this area.

Compensation for lost, delayed, or damaged mobility equipment

184. UK Regulation (EC) No 1107/2006 sets out ‘Where wheelchairs or other mobility equipment or assistive devices are lost or damaged whilst being handled at the airport or transported on board the aircraft, the passenger to whom the equipment belongs shall be compensated, in accordance with rules of [international law and the law of England and Wales, Scotland and Northern Ireland].’
185. Under the Montreal and Warsaw Conventions, limits are placed on carriers’ liability for lost, delayed, or damaged mobility equipment. However, this does not often cover the cost of repair or replacement. However, under Article 25 of the Montreal Convention ‘a carrier may stipulate that the contract of carriage shall be subject to higher limits of liability than those provided for in this Convention or to no limits of liability whatsoever’. The CAA encourages carriers to consider voluntary arrangements on a case-by-case basis, which will provide compensation that fully covers the cost to the passenger. Whatever the policy of the airline this should be stated on its website.
186. The airline should advise the person of the option to make a special declaration of interest, under Article 22(2) of the Montreal Convention or under Article 22(2) of the Warsaw Convention, that sets out the monetary value of the mobility aid and a description of its identifying features.

Proposed criteria to achieve specific ratings:

To achieve a ‘Good’ rating, airlines must achieve the following:

- Provide compensation in line with the Montreal and Warsaw Conventions for delayed, damaged, or lost mobility equipment.
- Advise the individuals planning to take mobility equipment on board an aircraft of the option to make a special declaration of interest, under Article 22(2) of the Montreal Convention or under Article 22(2) of the Warsaw Convention, including an explanation of why this would be a beneficial act for the individual.

Q32. Are the proposed criteria to achieve a 'Good' assessment level in relation to delayed, lost, or damaged mobility equipment appropriate? Should the CAA consider more criteria? If so, what criteria?

Q33. Do you have views on airlines reporting incidents of lost, delayed and damaged mobility equipment?

Chapter 7

Definition of ratings and frequency of review

Definition of ratings

Overall rating

187. We have set out above a set of proposed criteria required to achieve a 'Good' or 'Very Good' rating under each sub-section.
188. In line with the Airport Accessibility Framework, it is the CAA's view that there is benefit in setting out an 'Overall rating' which considers the rating of each sub-section.
189. Our current view is that a 'Very Good' airline should be able to demonstrate excellence across most of the criteria, which cover assistance to people with a range of needs, and in no criteria should they fail to meet a 'good' level. We propose for the initial publication of this guidance 70% of criteria be met at a 'very good' level for an overall rating of 'very good' to be achieved. We propose to review this threshold, and consider additional criteria, in due course.
190. Where an airline fails to achieve a 'Good' rating in 70% of the criteria, in each sub-section set out above, it is the CAA's view that it would be appropriate to rate them as either 'Needs Improvement' or 'Poor'.

Q34. Is the proposed method to calculate the Overall rating appropriate? Should the CAA consider an alternative approach?

Needs Improvement and Poor

191. Within each subsection set out above, where an airline fails to achieve a 'Good' or 'Very Good' rating, we propose that the CAA will record the rating as either 'Needs Improvement' or 'Poor' based on the requirements set out below:

Needs Improvement:

- failed to reach the criteria for 'good' but has provided the CAA with evidence of commitments, and progress towards, meeting the criteria in a reasonable timeframe;
- or
- failed to provide the CAA with the all the required information on its performance.

Poor:

- failed to reach the criteria for ‘good’
and
- not provided the CAA with evidence of commitments, and progress towards, meeting the criteria in a reasonable timeframe.

Q35. Are the proposed criteria to achieve a ‘Needs Improvement’ and ‘Poor’ appropriate? Should the CAA consider an alternative approach?

Frequency of review

192. Over 100 airlines operate to and from the UK, all of which fall within the scope of the CAA’s enforcement powers regarding Regulation (EC) No 1107/2006. Given this high volume of airlines, the CAA must consider the frequency of review against an Airlines Accessibility Framework, having regard to the resourcing requirement to undertake each review and the CAA’s Consumer Protection, Competition Law and Economic Regulation Work Prioritisation Principles¹³.
193. The CAA does not intend to undertake assessments of airlines all at once or necessarily on an annual basis. However, we aim to assess the largest 20 airlines by passenger volumes in the first two years.
194. The CAA intends to consider factors such as the volume of passengers, the nature of the operation (e.g. type of aircraft used), intelligence gained from ongoing research (both CAA and external) and complaints (both to ADR bodies and CAA) to prioritise the order of assessments.
195. Where an airline has previously been rated as “Poor” or “Needs improvement” the CAA may consider it appropriate to undertake an assessment more frequently than where an airline has previously been assessed as “Good” or “Very Good”.
196. We may adjust the frequency of the reviews and the assessment criteria in exceptional circumstances.

Q36. Is the approach set out above about the frequency of reviews appropriate?

¹³ [Prioritisation Principles for the CAA’s Consumer Protection, Competition Law and Economic Regulation Work](#)