

Airline Accessibility Guidance

CAP 2990

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Civil Aviation Authority
Aviation House
Beehive Ring Road
Crawley
West Sussex
RH6 0YR

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Enquiries regarding the content of this publication should be addressed to:
consumerenforcement@caa.co.uk

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Chapter 1

Introduction

1. The UK Civil Aviation Authority (CAA) is responsible for the enforcement of Assimilated Regulation (EU) No 1107/2006 ('the Regulation') concerning the rights of disabled and less mobile persons when travelling by air. 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 the Regulation and improving the overall quality of assistance at 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 the Regulation 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.
4. This guidance sets out the requirements of the Regulation and associated guidance in one place: to provide clarity to airlines as to what actions they need to take in order to meet their obligations under the regulations; and to help give passengers the confidence to travel, knowing that their assistance needs will be met. Airlines should always read any guidance in combination with the full text of the legislation and guidance listed in the next chapter, and any other relevant legislation and guidance which is published or amended from time to time. This guidance is divided into sections covering the key parts of the passenger journey.
5. The guidance will be used as a reference for periodic airline accessibility assessments to be carried out by the CAA. The criteria used for these assessments is at Annex 1. The definition of ratings and frequency of reviews is at Annex 2

6. In developing this guidance, the CAA undertook a consultation process. This consultation (CAP 2486¹) and the summary of responses (CAP2486A) are published on the CAA website.

¹ Performance framework for airline accessibility (caa.co.uk)

Chapter 2

Legal framework

7. The Regulation 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 guidance is primarily intended to direct airlines and other businesses to the relevant international and national legislation and guidance. In some areas, we include additional guidance, as well as providing examples of best practice. The legislation and guidance referred to in this document includes:
- Assimilated Regulation (EU) No 1107/2006 concerning the rights of disabled and reduced mobility persons when travelling by air ('the Regulation')
 - European Civil Aviation Conference Document 30 ('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')²
 - 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')
 - Assimilated Regulation (EU) 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
 - 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

² The European Commission plans to produce a revised version of the guidelines in the near future. The CAA will then review the new guidelines and revise and reissue this document if appropriate.

8. Airlines, as service providers, have obligations to certain groups of people³ under the Equality Act 2010 (EA 2010). In the context of providing a service, the EA 2010 prohibits discrimination⁴ 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.
9. To avoid an overlap between the requirements of the EA 2010 and the Regulation, the EA 2010 requirements on making reasonable adjustments for disabled people do not apply in respect of anything governed by the Regulation⁵. However, for those aspects of airlines service provision that fall outside of the scope of the Regulation, airlines should ensure that they can and do comply with the requirements of the EA 2010, including making reasonable adjustments for disabled people.
10. Although the CAA does not enforce the EA 2010, the Public Sector Equality Duty 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.

³ 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.

⁴ Section 29 of the EA 2010.

⁵ 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 the Regulation.

Chapter 3

Pre-Journey

Website accessibility and the provision of essential information

Website accessibility

11. 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 homepage [of an airline’s website]. One ‘click’ includes a mouse rollover, which then invites the user to select the ‘Special Assistance’ link from a menu or list of other links. The homepage is the front page of the airline’s website, intended to be the first page that visitors see when reaching a website’s URL.
 - ‘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 disabilities⁶ 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 guidelines⁷.’
12. 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,

⁶ 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.

⁷ <https://www.w3.org/TR/WCAG21/>

cognitive limitations, restricted movement, photosensitivity, or any combinations of these’.

13. 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 less mobile passengers (as set out below); and the booking and check-in function be in compliance with WCAG 2.1.
14. The CAA notes that just because a website meets the requirements of WCAG, this does not necessarily guarantee usability. Reflecting this, the CAA recommends that airlines consult third parties and consumers with lived experience that use assistive technology to test the usability of their website.

Provision of essential information

15. Article 4.3 of the Regulation 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.'
16. Annex II of the Regulation includes a requirement for the 'communication of essential information concerning a flight in accessible formats'.
17. 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.
18. The 'Carrier Identity Regulations' (Assimilated Regulation (EU) 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 carrier⁸) require airlines to ensure that passengers are informed of the operating carrier if it differs from the contracted carrier.
19. 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 a 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.

⁸ [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 \(Text with EEA relevance\) \(legislation.gov.uk\)](#)

20. Provision of essential information should be available prior to a passenger making a booking, when possible, or as soon as it is available. Although generally this would be expected to be provided online, airlines should be able to provide information by other accessible means (for example, by telephone).

Requesting assistance and pre-notification

Requesting assistance and pre-notification

21. Under Article 6 of the Regulation '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 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 the published departure time).
22. Annex 5-H of ECAC Doc 30 sets out guidelines on pre-notification of disabled and less mobile persons. In line with paragraph 4, 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 the Regulation.
23. 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 codes⁹ ('IATA codes') and the opportunity to provide extra information in addition to IATA codes. However, the ability to book assistance should not solely be through this channel - there should also be an opportunity to do so via the telephone to enable passengers to explain their requirements and to discuss the assistance options available.
24. ECAC Doc 30 Annex 5-J paragraph 1 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 [and so on]'. An airline should not solely rely on one communication channel to enable a passenger to provide information. This will help ensure all relevant information is gathered and it is accurate.

⁹ [Service SSRs - Special Service Requests \(SSRs\) \(iata.org\)](https://www.iata.org/en/your-partners/iata-departments/iata-special-services/iata-special-service-requests)

25. Airlines should proactively engage with their network of tour operators and travel agents to ensure the correct gathering of information from passengers requiring assistance.
26. Paragraph 4 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 should be undertaken to demonstrate compliance with Article 6 of the Regulation. 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. Make sure the DPNA code is included, as persons with [non-visible] disabilities might not relate with the wheelchair bound assistance codes. The DPNA code always requires extra information on what specific assistance is needed. This would allow [disabled and less mobile persons] to validate whether their airline/tour operator/travel agent has assessed their assistance needs.’
 - ‘Encourage [disabled and less mobile persons] to take responsibility for their journey.’ The CAA encourages airlines to capture 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. The airline should ensure the data is up to date by regularly reviewing with the passenger.
 - ‘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

27. 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. 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 and accurate information on their assistance needs to the airline, their agent, or the tour operator. For example, information such as dimensions of mobility equipment, mobility equipment battery type and capacity 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 operating 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.
28. The Regulation states under article 7 that 'The assistance provided shall, as far as possible, be appropriate to the particular needs of the individual passenger'.
29. 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).
30. Annex 5-H of ECAC Doc 30 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 at a later date. 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 particular 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'. This is subject to airport systems being able to accommodate these messages. In addition, it is important that messages are clear and accurate, to prevent misinterpretation of a person's needs.
31. Annex 5-H 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). 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.

Passing on information within, and between, airlines

32. 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 and, if applicable, to another airline if the contracted carrier is using another airline to operate the flight. 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 (for example ground handlers), and onboard the aircraft (that is cabin and flight crew), including those staff of another airline if another airline is operating the flight. 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. This should include carrying the assistance needs over to a new flight in case the flight is cancelled or changed.

Access and medical clearance

33. The Regulation 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.
34. The Regulation 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.
35. The Regulation 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'.
36. ECAC Doc 30 section 5.6.1 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 from an airline 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). Airlines should never refuse a passenger airport assistance through their booking system. Any limitation on passengers requesting assistance should be made on the basis of airline assistance, not airport assistance (generally those passengers categorised as 'WCHR' and 'WCHS' are primarily requesting airport assistance.)

37. 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 provide requirements and guidance.
38. The Regulation 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 disabled passengers should not be chosen for medical clearance unless there is a valid reason for doing so, such as an expectation air travel may adversely impact a passenger's health. To do so can also put significant strain on medical services (for example, requesting signed medical evidence). Airlines should ensure processes reflect this so that passengers are not treated unfairly. These processes should be published on airport websites. Airlines should also ensure that the process of submitting the required documentation is accessible for all passengers; for example, by ensuring phone lines are available to discuss requirements and processes and, if available, through submission via accessible digital and written forms.
39. The Regulation 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 Assimilated Regulation (EU) 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. Depending on the routing, airlines may also have to adhere to other national regulations in place.

40. 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. The airline should ensure the data is up to date by regularly reviewing with the passenger.

Accompanying persons

41. The Regulation 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 provide requirements and guidance. The CAA's view is that sitting an accompanying person next to the person best meets these requirements.
42. ECAC Doc 30 encourages airlines to 'offer discounts for the carriage of an 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.
43. The CAA's view is that it is best practice to offer free or significantly discounted rates for accompanying persons that are required by the airline for safety reasons.

Chapter 4

At the airport

Checking-in

44. 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.
45. 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'. The CAA acknowledges that providing some of these options for passengers may be dependent on airport infrastructure.
46. IATA's International Air Transport Association's Passenger Accessibility Operations Manual ('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 before check-in it is assumed the airport, or its contracted provider, will do this).
47. CAP2241 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. This is subject to airport infrastructure allowing for safe handling of the mobility aids. For example, it might be unsafe for a ground handling agent to carry a heavy mobility aid up a stairwell linked to an air bridge.

Boarding and disembarking

48. 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 (that is prior to all other passengers) and disembark (that is 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.’
49. It is the CAA’s view that gate staff should make announcements about pre-boarding, inviting those disabled and less mobile passengers that require separate boarding to board first before general passenger boarding. This is subject to both passengers being at the gate in time for pre-boarding and any health and safety considerations.
50. Airports and airlines should work together to try to ensure that these passengers are at the gate ready for pre-boarding. Airlines should also ensure that they have sufficient time to pre-board and be seated before general passenger boarding. For those that have not booked assistance, reasonable efforts should be made. Whilst these offers for pre-boarding should be made, ultimately it should be the passenger’s choice when they board, subject to safety considerations and the passengers being at the gate in time for pre-boarding.
51. For disembarking, crew should invite disabled and less mobile passengers to remain on the aircraft until all other passengers have disembarked. Airlines should be mindful of those connecting to another flight.
52. It is the CAA’s view that airlines should provide alternative 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 solely for boarding and disembarking. Not all passengers would want a separate boarding experience (for example 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.
53. Airlines should instruct crew to facilitate assistance for boarding and disembarking where appropriate. The CAA’s view is that a handover procedure should be in place at boarding and disembarkation to ensure crew and ground

handlers liaise with assistance agents to ensure the safe disembarkation process of assisted passengers.

54. Cabin crew should not provide assistance to passengers to board or disembark who have requested assistance under the Regulation. Assistance should be provided by airport or contracted staff who have specialist training and equipment.

Chapter 5

During the Journey

Onboard facilities

Seat allocation

55. The Regulation 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 seating, in the class booked, that meets the needs of individuals, where this is available at the time of booking. It is the CAA's view that Article 4 of the Regulation, whereby disabled passengers may be refused access for safety reasons, should only be exercised if all reasonable options to provide access have been considered.
56. 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'. In the CAA's view following this guidance should provide an airline with reassurance that it has made all reasonable efforts.
57. Disabled and persons with reduced mobility should not be charged a fee for access to a seat that meets the needs of individuals. However, CAP2241 states that there is no obligation on airlines to upgrade passengers or offer additional seats for free.
58. 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.

59. For many passengers with more complex mobility needs (generally WCHC categorised passengers), occupying an aisle seat is preferable to a window or middle seat because of the ease of access. Airlines should make aisle seats available for passengers with complex mobility needs unless there is a safety reason not to do so. Airlines should provide passengers with different seating options and let the passenger decide which seat best meets their requirements. 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.
60. Annex 5-F paragraph 4 of ECAC Doc 30 provides additional advice to airlines about seating passengers in aisle seats. Where the airline considers that seating a passenger with more complex mobility needs creates a safety issue for those seated in the middle or window seat next to that passenger, then the CAA's view is that it should seat the passenger in an aisle seat as requested but leave other seats empty in order to meet safety rules. To not do so risks the health and safety of the disabled passenger who would otherwise have to be assisted over other seats to reach another seat.
61. ECAC Doc 30 Annex 5-F 6 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.
62. 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 provides further examples.
63. 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).

64. 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 the Regulation.

Armrests

65. Some disabled and less mobile passengers are not able to easily transfer over a fixed armrest. ECAC Doc 30 recommends at 5.5 that 'in aircraft with 30 or more seats, 50% of all aisle seats should have moveable armrests.' Where an aircraft is fitted with seats with moveable armrests which are available at the time of booking assistance, disabled and less mobile passengers should be seated in these rows. Airlines should provide information on which seats have moveable armrests on website seat maps.

Seating for an accompanying person

66. The Regulation 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.
67. ECAC Doc 30 Annex 5-F 6 further sets out that disabled and less mobile passengers travelling with an accompanying person should be sat next to that accompanying person.

Supplementary seating

68. It is the CAA's view that, in line with the Regulation, unless for reasons of safety or security, airlines should accommodate all requests for use of 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.

Access to toilets

69. 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 5.5 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].'

70. Annex II of the Regulation requires airlines to provide 'assistance in moving to toilet facilities if required'.
71. ECAC Doc 30 paragraph 5.5 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 accessible for any passenger in need of it during the flight.'
72. The CAA acknowledges that to comply with the Regulation requirement to assist passengers in moving to the toilet, airlines may follow the recommendations. However, it is the CAA's view is that the Regulation 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, if the aircraft can accommodate an onboard wheelchair.

Storage of manual wheelchairs onboard

73. ECAC Doc 30 Section 5.5 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.' The CAA's view is that it is best practice for airlines to store manual wheelchairs onboard if practical.

Carriage of mobility and medical equipment

74. The Regulation 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)'.

75. There is no clear definition of 'mobility equipment' in the Regulation. However, CAP2241 Q19 states that 'it can be defined as any equipment the purpose of which is to provide mobility to disabled persons and persons with reduced mobility or assist them in their mobility.'
76. 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. While the CAA recognises the commercial implications of limiting hold baggage and the potential impact on other consumers, the CAA's view is that this is required in order for airlines to meet their obligations to transport mobility aids.
77. The Regulation 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.
78. 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.
79. 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 on arrival. 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. This is subject to airport infrastructure allowing for safe return of the mobility aids. For example, it might be unsafe for a ground handling agent to carry a heavy mobility aid up a stairwell linked to an air bridge.
80. The Regulation requires airports to ground handle mobility equipment. However, in practice ground handling agents, contracted by the carrier, generally carry out the majority of functions in regard to ground handling of mobility equipment. The CAA's view is that 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, airlines, airports, and ground handling agents should work together to ensure the safe handling of mobility equipment. The CAA's view is that following IATA's 'Guidance on the transport of mobility aids'¹⁰ will help airlines and airports fulfil their obligations, drive process improvements, and develop best practice. Ground handlers should also receive training on how to meet the needs of disabled persons and on disability awareness (see section below). The CAA recommends that this training includes a requirement for all ground handling staff to watch the Department for Transport's video: 'It's my legs - why handling wheelchairs with care matters'¹¹.

Assistance dogs

81. Under the Regulation 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'.
82. The Regulation 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 an assistance dog set out in the Equality Act.
83. The passenger should provide the airline with notice of the assistance dog's requirements in accordance with Article 7 of the Regulation.
84. Assistance dogs are likely to include the following assistance 'types' (note, this is not an exhaustive list):
 - Autism assistance dogs
 - Guide dogs
 - Hearing dogs
 - Medical alert assistance dogs
 - Physical disabilities assistance dogs
 - Post Traumatic Stress Disorder assistance dogs or Psychiatric Assistance dogs

¹⁰ [Guidance on the Transport of Mobility Aids \(iata.org\)](https://www.iata.org/en/pressroom/2016/04/2016042701)

¹¹ Powered wheelchairs: guidance for ground handlers - GOV.UK (www.gov.uk)

- Allergy alert dogs
 - Dementia assistance dogs
85. 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 for access to aircraft.
86. 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) or the International Guide Dog Federation (IGDF); or
 - received accreditation from the Assistance Dogs Assessment Association (ADAA); or
 - been trained to the same or higher standard as those set out by the organisations mentioned above, if evidence of training can be provided.¹²
87. Owners travelling with their assistance dogs that meet the criteria above should be required to provide the following documentation to the airline they are travelling with:
- Evidence of having met the minimum training standards (likely to be certificates provided by ADI, IGDF and ADAA).
 - Written declaration from the dog owner/handler confirming the task(s) the assistance dog has been trained to perform to assist them with their disability. In addition, documentation for assistance dogs is recommended. Having proper documentation can make the process smoother for both the passenger and the airline staff by helping to verify that the dog is needed to assist with tasks to help with the needs of a disabled person. Documentation, such as a valid assistance dog ID card, can help establish this.
88. If an assistance dog requires an extra seat for safety reasons this should be provided for free. Airlines should also consider an extra seat for animal welfare reasons for free or at a discounted rate. For UK airlines, Assimilated Regulation (EU) No 965/2012 (Air Operations) provides requirements and guidance on carriage of special categories of passengers and for foreign airlines local safety

¹² This might include dogs trained by organisations in some countries which legislate accreditation methods and / or assistance dogs are trained by government authorised organisations.

rules provide requirements and guidance. There is no obligation to provide an extra seat for free for comfort.

Training

89. The Regulation 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 passengers. 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.’
90. There is extensive guidance in ECAC Doc 30 Annex 5-F and 5-G on training requirements. There is also UK focussed guidance provided by the Department for Transport through its disability equality training for all transport modes, 'REAL training'.¹³ It is the CAA's view that following ECAC and REAL guidance will help deliver a performance that meets the Regulation.

Assistance during flight disruption

91. Assimilated Regulation (EU) No 261/2004 Article 11.1 states that during disruption 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 Assimilated Regulation (EU) No 261/2004 as soon as possible.’
92. For people with non-visible disabilities, being denied boarding may cause considerable confusion, anxiety, and distress. CAP1603 states that ‘airlines should ensure that they have systems and processes in place to identify and prioritise any disabled and less mobile persons, including anyone with an invisible disability, on the relevant flight’.
93. In the case of flight disruption, Article 9.3 of Assimilated Regulation (EU) No 261/2004 states that airlines should ‘pay particular attention to the needs of

¹³ REAL training: introduction and all transport modes modules - GOV.UK (www.gov.uk)

[disabled passengers and 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 (that are not pre-notified). Prioritising may entail bringing passengers to the front of the queue, putting them on the first available flight or a flight that meets the person's needs as well as arranging accommodation that meets the passenger's needs. 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). Systems and processes should be accessible; for example, communication about the impact of the disruption and instructions should also be accessible to passengers with hearing and sight loss.

94. Airports continue to have responsibility for providing assistance to disabled and reduced mobility passengers at the airport under the Regulation.

Chapter 6

Post Journey

Complaint handling

95. The Regulation 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.’
96. Airlines should have established procedures for handling complaints. Procedures should be accessible, including the ability to raise a complaint over the telephone. Staff handling complaints should have relevant expertise and ideally be part of a separate, adequately resourced, team specialising in accessibility matters.
97. The Regulation 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.’
98. 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 the Regulation 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 (PACT). The Consumer Council for Northern Ireland (CCNI) is the designated complaints handling body relating to flights departing from a Northern Ireland airport. Airlines should refer passengers to the CCNI if the flight departed from an airport in Northern Ireland.

Compensation for lost, delayed, or damaged mobility equipment

99. The Regulation 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].’
100. Under the Montreal and Warsaw Conventions, limits are placed on carriers’ liability for lost, delayed, or damaged mobility equipment unless the person opts to make a special declaration of interest, under Article 22(2) of the Montreal

Convention or under Article 22(2) of the Warsaw Convention. However, often this does not cover the cost of repair or replacement. 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. It recommends that the policy of the airline should be stated on its website.

ANNEX 1

Assessment criteria

Website accessibility and the provision of essential information

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

- 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 or plans to achieve this in a reasonable time.
- 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.

Requesting assistance and pre-notification

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

- Have an 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 (that is more than IATA codes).

Access and medical clearance

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 the Regulation.
- Not prevent passengers requesting airport assistance (generally categorised as WCHR and WCHS).
- Have medical clearance processes that are reasonable and proportionate, in line with the expectations set out in this guidance.

Accompanying persons

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

- Where an airline requires a disabled or less mobile person to travel with an accompanying person, the airline should ensure that the accompanying person is seated next to the disabled or less mobile person they are accompanying.

Checking-in

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

- Offer an alternative method of assisting disabled and less mobile persons at check-in.

Boarding and disembarking

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 (that is prior to all other passengers and subject to passengers being at the gate on time for pre-boarding) and disembark 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 and ground handlers to liaise with assistance agents to ensure the safe disembarkation process of disabled and less mobile passengers.

Onboard facilities

Seat allocation, armrests, seating for an accompanying person and supplementary seating

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.
- Seat disabled and less mobile passengers with complex mobility needs in aisle seats unless there is a safety reason (which cannot be overcome by leaving inside seats empty).
- Have moveable armrests (for aircraft with 30 or more seats) on 50% of aisle seats.
- Have processes that ensure reasonable efforts to seat an accompanying person next to a disabled and less mobile person.
- Accommodate all requests for supplementary seats or harnesses unless for reasons of safety or security.

Access to toilets

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

- Have onboard wheelchairs as standard or on request on all aircraft if the aircraft can accommodate onboard wheelchairs.

Carriage of mobility and medical equipment

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 the aircraft side (if practical and 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'.

Assistance dogs

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

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

Training

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

- Have training programmes in line with ECAC Doc 30 annex 5-F and 5-G and DfT's REAL guidance.

Assistance during flight disruption

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

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

Complaint handling

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 PACT, as appropriate.

Compensation for lost, delayed, and damaged mobility equipment

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.

ANNEX 2

Definition of ratings and frequency of review

Definition of ratings

Good rating

101. An airline must meet all criteria to achieve a 'Good' rating in each section.

Needs Improvement and Poor

102. Where an airline fails to meet all criteria to achieve a 'Good' rating it is the CAA's view that it would be appropriate to rate them 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 time;
- 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 time.

Frequency of review

103. Over 100 airlines operate to and from the UK, all of which fall within the scope of the CAA's enforcement powers regarding the Regulation. Given this high volume of airlines and the wide range of issues included in this guidance the CAA must consider the frequency of review having regard to the resourcing requirement to undertake each review and the CAA's Consumer Protection, Competition Law and Economic Regulation Work Prioritisation Principles¹⁴.

¹⁴ [Prioritisation Principles for the CAA's Consumer Protection, Competition Law and Economic Regulation Work](#)

104. The CAA does not intend to undertake assessments of all issues set out in this guidance at once or necessarily on an annual basis. However, we aim to assess all issues in a five-year period.
105. 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".
106. We may adjust the frequency of the reviews and the assessment criteria in response to industry developments and exceptional circumstances.