

# CAA Accessibility Assessment Report

## London Stansted Airport

August 2024

### 1. Background

1.1 The UK Civil Aviation Authority (CAA) is responsible for the enforcement of Assimilated Regulation (EU) No. 1107/2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air (“UK Regulation (EU) No. 1107/2006”). This applies to all flights from the UK and flights to the UK on UK 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.

1.2 In respect of the obligations on airports set out in UK Regulation (EU) No. 1107/2006, the CAA undertakes oversight work under two workstreams:

- **Airports Accessibility Framework (CAP 1228):** a standardised method of assessing UK airports in the provision of assistance to those with accessibility needs. This framework sets out a rating approach to assess the provision of assistance by airports, which considers both legal obligations of airports (to ensure minimum standards are maintained) and best practice (to drive continuous improvement in the provision of assistance). The CAA publishes an annual report assessing UK airports against this framework every summer.
- **Periodic “Deep Dive” accessibility assessments of individual airports across the UK:** these assessments review all aspects of the provision of assistance to disabled and less mobile passengers against airport obligations set out under UK Regulation (EU) No. 1107/2006 and all key guidance associated with this. The assessments look to identify examples of best practice to drive improvement across all UK airports, as well as making observations and identifying findings of

improvements that need to be made at the individual airport subject to the assessment.

- 1.3 To improve transparency in the provision of the assistance service at UK airports and to enable widespread visibility of areas of good practice, the CAA will begin publishing all accessibility assessments where some or all elements of the assessments were conducted on or after 1 April 2023. It is intended that assessment reports will be published annually, alongside the publication of the Airport Accessibility Framework annual reports.
- 1.4 This report sets out the findings of the CAA's assessment of the accessibility of London Stansted Airport.

## 2. Methodology

- 2.1 The CAA undertakes its assessment of airports with regard to the following regulations and guidance:
- Assimilated Regulation (EU) No. 1107/2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air ("UK Regulation (EU) No. 1107/2006")
  - CAP 2241 Interpretative guidelines on the application of UK Regulation (EU) No. 1107/2006 ("CAP 2241")
  - ECAC Doc. 30 Part 5 and annexes 5-A-5-L ("ECAC Doc. 30")
  - CAP 1228 CAA guidance on quality standards ("CAP 1228")
  - CAP 1228A CAA guidance on data collection under CAP1228 ("CAP 1228A")
  - CAP 1411 CAA guidance on hidden disabilities ("CAP 1411")
  - Explanatory note on the CAA assessment of complaint handling
  - CAP 2374 CAA guidance on assistance service at UK airports ("CAP 2374")
  - The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015 (as amended by) The Alternative Dispute Resolution for Consumer Disputes (Amendment) Regulations 2015 ("ADR Regulations")

- Department for Transport REAL Training: introduction and aviation modules (“DFT REAL Training”)
- Department for Transport Inclusive Mobility: A guide to best practice on access to pedestrian and transport infrastructure (“DFT Inclusive Mobility”)

2.2 In order to undertake an assessment, the CAA seeks information from an airport in the form of a standard questionnaire. Following receipt of a response to this, the CAA will ask follow up questions, request additional information and documentation, and undertake site visits and interviews.

2.3 The table below sets out a timeline of the collection of information and site visits undertaken as part of the assessment of London Stansted Airport and Appendix A provides a summary of work undertaken.

<b>Data type</b>	<b>Description of the data</b>	<b>When was the data collected</b>
Questionnaire response	Information on: <ul style="list-style-type: none"> <li>▪ airport structure,</li> <li>▪ charging,</li> <li>▪ airport assistance,</li> <li>▪ designated points,</li> <li>▪ seating,</li> <li>▪ training,</li> <li>▪ quality standards,</li> <li>▪ hidden disabilities,</li> <li>▪ personal mobility equipment,</li> <li>▪ complaints handling,</li> <li>▪ airport infrastructure</li> </ul>	February 2023
Questionnaire response	Service level agreements between London Stansted and their service provider	February 2023
Questionnaire response	Survey of assistance service users	February 2023
Questionnaire response	Physical and hidden disability training	February 2023, February 2024
Questionnaire response	Pet passport and assistance dog information slides	February 2023
Questionnaire response	Disability awareness training	February 2023
Questionnaire response	Assisted travel complaints and queries	February 2023

Online	London Stansted Airport's website	April 2023
Site visit	Walk through of passenger journey	March 2023
Site visit	Check of facilities and equipment	March 2023
Site visit	Performance checks	October 2023
Site visit	Second walk through of passenger journey	January 2024

2.4 Where the CAA identifies an area of non-compliance with legislation or, in its view, guidance which should be followed to ensure compliance, a finding will be raised. Airports should ensure the CAA and their access forums are kept up to date with findings and the actions they are taking to resolve these. Airport access forums should also be involved in any remedies implemented.

2.5 An observation is raised where the CAA identifies an area in which the airport should consider taking action to avoid future non-compliance with legislation or associated guidance. We expect airports to take this advice seriously and act on it appropriately. They should also consult their access forums or disability organisations to decide their next steps and the CAA may request information on actions taken. Observations will usually be raised when guidance is not being followed, when more information is required by the CAA, or when it is anticipated that the airport, although currently in compliance, might not remain so unless appropriate action is taken.

### 3. Summary of key findings and observations

3.1 A summary of findings and observations for the accessibility assessment of London Stansted Airport can be found in the table below:

Category	Area	Issue level	Comments
Airport assistance	Assistance dogs	Observation	During the assessment London Stansted Airport provided information on their staff training for assistance dogs. These slides did not appear to include information on the airside and landside dog relief areas. In addition, during the site visit, it was noted that the dog relief areas were not signposted for passengers and staff. ECAC Doc. 30 Section 5.13.7 states that installations which are designated for disabled and less mobile passengers should be appropriately signposted.
Designated points	Location	Finding	During the site visit, entry and exit points to the airport were checked for designated points in line with requirements in ECAC Doc. 30 Section 5.11.3, Annex 5-C and 5-K. It was noted that there was no designated point or call point observed by the coach drop off bay.
Designated points	Signage	Finding (rectified before publication)	<p>In Mid Stay 1 car park there are help points in the two bus shelters nearest to the blue badge spaces. The call points are for car park and bussing enquiries rather than requesting assistance. No information is provided in the Mid Stay 1 car park for disabled and less mobile passengers on how they can notify the airport of their arrival, or how they could get assistance, this is a requirement of UK Regulation (EU) No. 1107/2006 Article 5 and ECAC Doc. 30 Sections 5.13.5, 5.15.1 and Annex 5-K. London Stansted Airport's website advises passengers of the process from Mid Stay 1 and that the bus driver will assist them off, and on, the bus, and that designated points are located by the terminal doors.</p> <p><u>UPDATE:</u> During the second site visit, additional signage had been added to the bus shelters in the Mid Stay 1 car park. The signage provided information for disabled and less mobile passengers requiring assistance from the car park. One call point was out of service, but this was compensated with a notice and phone number for passengers to use.</p>

Designated points	Signage and entry points	<p><b>Finding</b> (partially rectified before publication)</p>	<p>On the day of the first site visit, the bus stop by the blue badge spaces was closed and passengers were advised to find another bus stop. No information on direction or walking distance was provided and there was no tactile paving to guide passengers to the nearest open bus stop. UK Regulation (EU) No. 1107/2006 Annex 1 includes that arrangements should be in place for disabled and less mobile passengers to communicate their arrival and move from a designated point. Additionally, there was no seating at the bus stop and this bus stop was up a steep ramp and may not be suitable for some wheelchair users. ECAC Doc. 30 Annex 5-K recommends that basic information about the airport, including maps and walking distances should be provided at designated points, as well as seating in case passengers are required to wait for assistance to arrive. In ECAC Doc. 30 Section 5.3.7, facilities which are for disabled and less mobile passengers should be appropriately signposted. Designated points are required to have seating nearby in case passengers are required to wait for assistance to be provided and DFT Inclusive Mobility guidance Section 9.4 recommends that bus shelters incorporate a bench, platform, or horizontal rails for passengers to sit or lean against. The gradient of the ramp was not checked, guidance on ramps and inclines can be found in DFT Inclusive Mobility Section 5.2.</p> <p><u>UPDATE:</u> During the second site visit, the bus stop nearest the blue badge spaces was open and there were no issues with access to the terminal using the bus connection.</p>
Designated points	Signage	<p><b>Finding</b> (rectified before publication)</p>	<p>Signage in the Short Stay Orange car park suggested that assistance from this point was only available for pre booked passengers – “For pre-booked assistance, please use the help point to speak to one of our team.” Although there are different service standards set out in ECAC Doc.30 for prebooked and non-booked passengers, airports cannot specify that assistance from designated points is only for pre-booked passengers.</p> <p><u>UPDATE:</u> During the second site visit, it was noted that the signage in the Short Stay Orange car park had been updated and the reference to “pre-booked passengers” removed.</p>

Designated points	Seating	Observation	Designated points should have nearby or adjacent seating in case passengers are required to wait for assistance to arrive. It was observed that multiple designated call points did not have seating nearby.
Designated points	Usability	Observation	ECAC Doc. 30 Annex 5-K provides accessibility recommendations for designated call points. We observed that call points which were located outside the front of the terminal building were not accessible for passengers who are unable to lift and hold the receiver easily. Call points have hearing loops installed for passengers with hearing loss, but the audit and serviceability checks conducted by London Stansted Airport did not include testing this feature.
Designated points	Reserved seating	Observation	During the site visit, seating was checked at key locations throughout the passenger journey, including the hosted area in the departure lounge. The hosted area was staffed during our visit and is signposted as a seating area for disabled and less mobile passengers. However, the area was busy, and it appeared that it was being used as a general seating area rather than a designated area for disabled and less mobile passengers.
Training	Security staff	Observation	Security staff should receive in person disability equality and awareness training rather than e-learning modules. Testing and assessments should take place in the form of classroom-based activities, oral and written exercises, or a written test under exam conditions (DFT REAL Training Programme Manual for Trainers Section 5). London Stansted Airport advised that staff who provide direct assistance to disabled and less mobile passengers receive in person disability equality and awareness training but other customer facing roles, including security receive e-learning courses.
Training	Staff providing direct assistance	Observation	Information provided by London Stansted Airport on training for staff providing direct assistance to disabled and less mobile passengers does not include all aspects of Module 1 from ECAC Doc. 30 Annex 5-G. For example, information on UK Regulation (EU) No. 1107/2006 was not included in the training.
Training	Internal trainer requirements	Observation	DFT REAL Training Programme Manual for Trainers Section 4 includes requirements for internal trainers and organisations which use the train the trainer method. These requirements include holding appropriate qualifications, experience in the industry, and working with or lived experience of disability. London Stansted Airport and ABM's internal trainers appeared to have not received in depth disability equality and

awareness training. This training should be conducted by a provider with the appropriate level of experience in line with the DFT REAL training and refreshed on a regular basis.

Complaints handling	Alternative dispute resolution	Finding	The complaints handling assessment found that complainants were not routinely being referred to the Centre for Effective Dispute Resolution (CEDR), London Stansted Airport's contracted alternative dispute resolution (ADR) provider when the complaint reached deadlock. This is a requirement of the ADR Regulation Article 19.
Complaints handling	Deadlock letter	Finding	London Stansted Airport provided the CAA with their template deadlock text for referring complaints to ADR. The text provided did not meet the requirements of the ADR Regulation. In 2017, the CAA wrote to airports regarding complaints handling and the requirements in Article 19 of the ADR Regulation and provided suggested deadlock text in this letter.
Infrastructure	Entry points and signage	Observation	London Stansted Airport charges a £7 fee for 15 minutes to drop off in the Express Set Down area and this time limit is extended for disabled and less mobile passengers, there is a reserved area for blue badge holders with multiple designated points. Information on the time extension process is not provided in the set down area. London Stansted Airport's website includes that the time can be extended on request, but information is not provided on how long this can be extended to, ECAC Doc. 30 Section 5.13.7 includes that facilities for disabled and less mobile passengers should be appropriately signposted. Although we note there is free drop off available in Mid Stay 1 which is connected to the terminal by an accessible bus transfer. Clear information on the process, the price and how long blue badge holders can extend the drop off time for should be provided in the drop off area and on London Stansted Airport's website.
Infrastructure	Entry points and accessibility	Observation	Blue badge car parking spaces were available in all car parks and in the Express Set Down area, all with designated call points nearby. There were additional designated call points by the terminal access doors. It was observed that in the Orange car park some blue badge spaces were inaccessible for wheelchair users as they were regular sized spaces rather than the larger size (4.8m x 2.4m with the difference of 1.2m being hatched lines that can be shared with adjacent spaces, DFT Inclusive Mobility Section 8.3) that allow wheelchair users space to get in and out of their vehicles.



Infrastructure	Signage	Observation	ECAC Doc. 30 Annex 5-K, Section 4 states that installations designed or reserved for disabled and less mobile passengers should be appropriately sign posted. Inside the terminal, along the arrivals route, there were areas where signage could be improved with details such as walking distances and information on the availability of assistance along the journey. Information is not provided at the highlift drop off point to inform passengers of the short walking to the border and baggage reclaim. Provision of this information may reduce the number of passengers who need assistance from this point, particularly if information on the separate queue for disabled and less mobile passengers at the border and the existence of an assistance point in baggage reclaim if further assistance is required at this point is provided.
Infrastructure	Information	Observation	UK Regulation (EU) No. 1107/2006 Article 5.2 relates to designated points of arrival and departure, and that basic information about the airport should be included at these points in accessible formats. Outside of the terminal, signage aimed at disabled and less mobile passengers is inconsistent in some areas. For example, in the Short Stay multi-story car park, blue badge spaces are clearly labelled and there is a yellow designated point for requesting assistance. However, there is no information available on the service provided at these designated points of arrival and departure. In other short stay car signage is purple and provides information that the assistance team will be sent to the location to assist the passenger.
Website	Information on mobility equipment	Observation	ECAC Doc. 30 Annex 5-J Section 3.8 sets out that information should be provided for passenger's travelling with mobility equipment, including as a minimum: information on using own equipment until boarding and repatriation of personal mobility equipment at the aircraft side; preparing equipment for travel; and for lost and damaged equipment on arrival. This information could not be found on the London Stansted Airport website. Information was found on the <a href="#">"Top Travel Tips"</a> page regarding travelling with a mobility aid and also on the <a href="#">"Requesting Assistance"</a> page regarding prebooking for electric mobility aids.
Website	Information on the helpline	Observation	ECAC Doc. 30 Annex 5-J Section 3.11 states that a helpline with opening hours should be provided to handle enquiries relating to disabled and less mobile passenger travel. The <a href="#">"Feedback, Performance and Consultation"</a> page includes an email address to direct questions, but no phone number is provided. It was

			noted that the <a href="#">AccessAble Guide</a> does include the helpline phone number for disabled and less mobile passengers.
Website	Layout	Observation (rectified before publication)	<p>The "<a href="#">Assisted Travel Services</a>" page is one click away from the home page under the "At the Airport" drop down and as a link directly on the home page. The information on London Stansted Airport's website is split into various subpages which are accessible from a landing page, and each have drop downs within. However, ECAC Doc. 30 Annex 5-J Section 1.1 states that information should be presented on a single web page or be accessible from a single landing page.</p> <p><u>UPDATE:</u> Since the website review was conducted, the assisted travel subpages are accessible from a single landing page.</p>
Website	Title and imaging	Observation (rectified before publication)	<p>There is a wheelchair symbol used on the link directly on the homepage which meets the requirements set out in ECAC Doc. 30 Annex 5-J Section 1.2 which sets out suggested international standard images for disability signage. However, the link included in the "At the Airport" drop down to information for disabled and less mobile passengers is named "Assisted Travel" but there is not a recognised symbol for example, wheelchair on the drop-down menu.</p> <p><u>UPDATE:</u> Since the website review was conducted, a new banner with link to the assisted travel page has been added to London Stansted's homepage. This banner uses blue and white high contrast colours and a wheelchair symbol.</p>

## 4. Best practice

- 4.1 Through airport accessibility assessments of UK airports, the CAA seeks to identify best practice at airports in their assistance service processes, equipment, and infrastructure. Publication of these reports will help share best practice between airports, airlines, service providers and passengers.
- 4.2 The following areas of best practice have been identified as part of our assessment of London Stansted:

### Invisible disabilities

- 4.3 During the assessment, several areas of best practice were seen for passengers with invisible disabilities. London Stansted offers sensory kits in operational areas for passengers with sensory challenges. Additionally, toilets have been upgraded in line with Colostomy UK's recommendations and now feature two hooks at different heights and a colostomy shelf in each accessible toilet. The airport is working with the Alzheimer's Society Essex to produce a dementia action plan, including the introduction of two dementia meeting places and they are aiming to become a dementia inclusive community this summer.

### Signage

- 4.4 ECAC Doc. 30 Section 5.10.9.1 states that "installations which are reserved or designed for persons with disabilities and [persons with reduced mobility] PRMs should be appropriately signed using internationally agreed standards". London Stansted Airport has signage for assistance lanes at security and the border and has gone beyond the recommendation in ECAC Doc. 30 by adding additional wayfinding signage to the terminal with the use of purple wayfinding lines. These lines help passengers find routes to areas specifically designated for passengers with reduced mobility. During the site visits, we observed a purple wayfinding line in place to show a route from the landside assisted travel desk to the accessible lane at security. Since the site visit, the wayfinding lines have been extended to the arrivals corridor used by disabled and less mobile passengers, which guides passengers to the dedicated lane at immigration.

## CAP 2374 - independent journeys

- 4.5 CAP 2374, published in summer 2022, sets out the CAA's view regarding 'appropriate assistance' within Article 7 of UK Regulation (EU) No. 1107/2006, with regards to CAP 2241. The CAA's view is that airports should adapt the assistance provided to the individual requirements of the passenger when assisting disabled and less mobile passengers. Assistance should be proportionate and appropriate to the specific needs of the passenger and this service can be effective and efficient whilst encouraging independence for passengers. London Stansted Airport has implemented some of the recommendations from [CAP 2374](#) and has other trials planned for later in the year.
- 4.6 London Stansted Airport and AccessAble have developed an online access guide which provides detailed information on the airport such as walking distances. This information is available in accessible formats through AccessAble's website and mobile application and advertised on London Stansted Airport's website.
- 4.7 Going forward, plans include renovation of Satellite 1 lifts and follow up boarding ramp trials planned for Satellite 3. Satellite 3 does not have air bridges therefore boarding ramps will help with passenger independence and step free access for all passengers. In addition, London Stansted Airport has worked with airlines to allow them, if capacity allows and prenotification shows a high number of assistance requests, for flights to be allocated to stands with air bridges. Airbridges, like boarding ramps can provide step free access to aircraft and the assistance process can be less resource intensive for staff as highlifts are not usually required. It will also allow passengers who can be assisted in airport wheelchairs by their travel companions, or in their own equipment to travel more independently through the airport.

## Training

- 4.8 Disability equality training provided to staff who work providing direct assistance to disabled and less mobile passengers has been accredited by Disability Rights UK. Disability awareness and equality e-learning which is being rolled out to all customer facing staff at London Stansted Airport uses videos of

disabled and less mobile passengers which enables participants to learn from a wide range of disabled and less mobile passengers and disability organisations.

## Appendix A – Summary of works undertaken



Area	Topics Covered	Work performed
1. Pre visit questionnaire and attachments	<ul style="list-style-type: none"> <li>▪ Airport structure,</li> <li>▪ Charging,</li> <li>▪ Airport assistance,</li> <li>▪ Designated points,</li> <li>▪ Seating,</li> <li>▪ Training,</li> <li>▪ Quality standards,</li> <li>▪ Hidden disabilities,</li> <li>▪ Personal mobility equipment,</li> <li>▪ Complaints handling,</li> <li>▪ Airport infrastructure.</li> </ul>	<p>Questionnaire was completed by London Stansted Airport. The questionnaire was reviewed by the CAA before the site visit.</p> <p>Interviews and follow up interviews took place with representatives from London Stansted Airport.</p> <ul style="list-style-type: none"> <li>▪ Reviewed answers and provided more detail and explanation where required.</li> </ul>
2. Walk through of passenger journey and checks of equipment	<ul style="list-style-type: none"> <li>▪ Designated points,</li> <li>▪ Seating,</li> <li>▪ Hidden disabilities,</li> <li>▪ Airport infrastructure</li> <li>▪ Seating</li> <li>▪ Signage</li> </ul>	<ul style="list-style-type: none"> <li>▪ Checked useability and serviceability of designated points.</li> <li>▪ Check access points to the airport for example, car parks,</li> <li>▪ Checked for equipment levels for example, wheelchairs available for self-mobilisation.</li> <li>▪ Observed signage in landside and airside areas.</li> <li>▪ Checked seating and other facilities designed for disabled and less mobile passengers.</li> </ul>
3. Airport tour	<ul style="list-style-type: none"> <li>▪ Airport infrastructure</li> <li>▪ Quality standards</li> <li>▪ Hidden disabilities</li> <li>▪ Independent travel</li> <li>▪ Airport equipment</li> </ul>	<p>Interviews took place with representatives from London Stansted Airport and American Building Maintenance (“ABM”).</p> <ul style="list-style-type: none"> <li>▪ System demonstrations (included walking through the journey for an arriving and departing passenger on a PDA).</li> <li>▪ Further explanation of processes and policies.</li> <li>▪ Explanation of facilities and future development plans.</li> </ul>
4. Compliance Review	Website review	<p>Desk top review conducted by the CAA.</p> <p>London Stansted Airport’s website was reviewed in line with guidance on website in ECAC Doc. 30 Annex 5-J.</p>

<b>Area</b>	<b>Topics Covered</b>	<b>Work performed</b>
5. Compliance review	Complaints handling assessment	Desk top review was conducted by the CAA. Complaint files were assessed against regulatory requirements from the ADR Regulations, ECAC Doc. 30, and UK Regulation (EC) 1107/2006.  Complaints files were provided by London Stansted Airport.