

# Accessibility assessment Report

## London Luton Airport

### August 2024



## 1. Background

- 1.1 The UK Civil Aviation Authority (CAA) is responsible for the enforcement of Assisted 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 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.
- 1.2 In respect of the obligations on airports set out in UK Regulation (EU) No. 1107/2006, CAA undertakes its 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 airports 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 reports will be published annually, alongside the publication of the Airports Accessibility Framework annual reports.

- 1.4 This report sets out the findings of the CAA's assessment of the accessibility of London Luton 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 ("CAP2241")
- 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 ("DFT") REAL Training: introduction and aviation modules ("DFT REAL Training")

- 2.2 In order to undertake its 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 and undertake site visits.

- 2.3 The table below sets out a timeline of the collection of information and site visits undertaken as part of the accessibility assessment of London Luton Airport, and Annex A provides a summary of the work undertaken.

<b>Data type</b>	<b>Description of the data</b>	<b>When was the data collected</b>
	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>	March 2023
Questionnaire response	Service level agreements between London Luton and their service provider	March 2023
Questionnaire response	Survey of assistance service users	March 2023
Questionnaire response	Physical and hidden disability training	March 2023
Questionnaire response	Pet passport and assistance dog information slides	March 2023
Questionnaire response	Disability awareness training	March 2023
Questionnaire response	Assisted travel complaints and queries	March 2023
Online	London Luton Airport's website	August 2023
Site visit	Walk through of passenger journey	March 2023,
Site visit	Check of facilities and equipment	March 2023, January 2024
Site visit	Performance checks	June 2023, September 2023, 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 that 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 appropriate next steps. The CAA may request information on actions taken.
- 2.6 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 the findings and observations can be found in the table below:

Category	Area	Issue level	Comments
Designated points	Designated points of arrival and departure	Observation	<p>The Mid Stay car park offers free drop off to passengers and the CAA observed that there is not a designated point in this area for disabled and less mobile passengers to notify the airport that they require assistance. In addition, during the first site visit to London Luton, the bus service connecting the Mid Stay car park to the terminal was not operating. Passengers may use the help button on the car park barriers to contact the airport’s car parking team who will direct the passenger to one of the Short Stay car parks which are the nearest car parks to the terminal. It was observed that there was an insufficient number of signs in the Mid Stay car park advising passengers that the bus service was not running, and the process for those who are unable walk to the terminal. UK Reg (EU) No. 1107/2006 Article 5.1 requires airports to designate points of arrival at entry points within the airport boundary so that passengers requiring assistance can announce their arrival. ECAC Doc. 30 Annex 5-C includes drop off and set down points and short and long-term car parks as being points which should be considered. In addition, ICAO Annex 9, Chapter 6 has requirements for international airports to ensure that adequate transportation is provided, by an appropriate service provider between terminal buildings and to transfer baggage from surface access arrival and departure points.</p> <p>However, London Luton Airport’s website provides information on the parking options for blue badge holders for example, reduced tariffs in the Short Stay car parks and, for all passengers, the Long Stay car park. The Long Stay car park which includes an accessible bus transfer to the terminal provides a suitable alternative to the Mid Stay car park and includes a free drop off period.</p> <p><u>UPDATE:</u> During the second site visit, an assistance bus operated by Wilson James and a passenger bus was running from the mid stay car park. This was due to the terminal drop off area and one of the Terminal Car Parks being closed due to a car park fire. This change is likely to be long term while the car park and drop off area is rebuilt. This area had additional signage and was staffed.</p>

Designated points	Call points	Observation	It was observed that the call point in baggage reclaim may not have been suitable for passengers with some mobility issues, in particular those without hand and arm strength or fine finger movement. ECAC Doc. 30 Annex 5-C includes recommendations which should be considered when designing call points.
Training	Training for security staff	Observation	Security staff undertake e-learning modules for their disability equality and awareness training. DFT REAL Training and the recommends that such training should be received in person, rather than e-learning modules, and tests should be performed in a classroom environment. 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 Luton 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	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, working with or lived experience of disability. London Luton Airport did not provide information on parts of the internal trainers training, for example how often the disability equality and awareness training was refreshed. Training should be conducted by a provider with the appropriate level of experience in line with the DFT REAL Training guidance and refreshed on a regular basis.
Quality standards	Surveys of assistance service users	Finding (resolved prior to publication or report)	CAP 1228 states that airports should actively advertise and promote their satisfaction surveys and email addresses of willing service users should be recorded so that a link to the survey can be emailed to them. London Luton Airport hosts its own survey of disabled and less mobile passengers which was advertised at host areas around the airport. Passengers using the assistance service were handed survey cards which includes a link to the survey, but the airport does not collect email addresses of passengers to send the survey link electronically.

UPDATE: We are pleased that on November 1, 2023, London Luton Airport began collecting passengers' email addresses and emailing out the survey as their primary method of distribution. Survey cards and posters are used as additional methods of distribution.

Invisible disabilities	Quiet routes	Observation	London Luton Airport currently requires all passengers to travel through the busy duty-free area and there is no bypass available. The airport advised that this is not possible with their infrastructure. It is recommended that CAP1411 is fully considered when future renovations to this area take place. CAP1411 includes a recommendation for airports, where space allows, to establish a quiet route and this could include bypassing retail stores, in particular for passengers with sensory conditions.
Website	Information on the layout of the airport	Finding	ECAC Doc. 30 Annex 5-J sets out areas about which airports should provide information on their websites. Information on the layout of the airport should include key walking distances and an airport map. Information on walking distances and a map of the airport were not found during the website assessment. A map relating to parking was found, as well as locations for specific facilities, such as the quiet room and changing places.
Website	Information on the helpline for disabled and less mobile passengers	Observation	ECAC Doc. 30 Annex 5-J also includes that airports should provide a helpline for enquiries from disabled and less mobile passengers. The helpline number with opening hours is only included in the quality standards document on London Luton Airport's website. Although this complies with guidance, the CAA recommends that the information is provided in the main information pages for disabled and less mobile passengers to improve passenger awareness of this helpline.
Website	Information on mobility equipment	Observation	Information regarding the arrangements for obtaining replacement mobility equipment if the passenger's own is damaged or lost on arrival could not be found on London Luton Airport's website. ECAC Doc. 30 Annex 5-J includes minimum information for passengers travelling with their own mobility aides, which includes the arrangements at the airport if a passenger's mobility aid is damaged or lost on arrival.

Where passengers make a complaint relating to the assistance service, airports should ensure they are providing compliant 'deadlock letters.' A deadlock letter is the final response to the consumer and informs them:

Complaints  
handling

Deadlock  
letters

Observation

- 1) the airport has considered their complaint,
- 2) the airport is making a final offer (this may be a rejection of their complaint), and
- 3) there is no further consideration of the matter available.

The deadlock letter should signpost where consumers can escalate their complaint if they are not happy with the outcome and wish to do so. London Luton Airport is not signed up to the service of a CAA approved alternative dispute resolution (ADR) entity therefore will need to signpost the CAA's Passenger Complaints and Advice Team (PACT).

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CAP 2374 –  
independent  
journeys

Signage on  
walking  
distances

Observation

Walking distances could be advertised at more points in the passenger journey to encourage those who can walk short distances to do so and provide confidence to family and friends on the distance they would be pushing their companion in a wheelchair.



## 4. Examples of 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 Luton Airport:

### Contacting the assisted travel team

- 4.3 ECAC Doc. 30 Section 2.8.5.1 states that arrangements must be in place for disabled and less mobile passengers to communicate their arrival and request assistance from inside and outside of terminal buildings. Our view is the use of free and local rate phone numbers is, in addition to call points, is good practice as they can be advertised to passengers easily through signage. At London Luton Airport, passengers are able to notify the airport of their arrival and contact the assistance team by phone, as well as, in some areas, call points. The telephone number is advertised at passenger arrival points outside of the terminal building, for example the coach and bus interchange.
- 4.4 The phone number and designated call points were tested by the CAA during the site visit, and all were answered quickly and politely. The designated point in the Long Stay car park rang through to car park staff, and we were informed that there would be an accessible bus arriving within 10 minutes and the driver could assist onto the bus. An accessible bus arrived three minutes later.

### Contingency planning

- 4.5 ECAC Doc. 30 Annex 5-C Section 4.1 includes “adequate assistance in the case of (long) delays and/or cancellation of flights (covering the momentary needs of the disabled person or PRM)”. During the assessment, London Luton Airport provided information on their Customer Care and Welfare Protocol and informed the CAA how disabled and less mobile passengers, and vulnerable groups were supported during disruption for example, departure delays of more than one hour and long waits for baggage on arrival. Although this is aimed at passengers on the whole, it includes provisions that ensure that when disruption occurs, staff will be aware of disabled and less mobile passengers and have processes in place to ensure their needs are considered during a variety of situations.

## Staff training and collaboration with organisations representing disability groups

- 4.6 ECAC Doc. 30 Section 5.16.4 and Annex 5-C Section 4.1 states that training should be delivered in cooperation with organisations representing disabled and less mobile passengers. London Luton Airport has collaborated with members of the London Luton Airport Accessibility Forum to create a new disability awareness training e-learning course for customer facing airport staff. The course covers a range of accessibility topics and includes videos of forum members talking about their experiences of flying with a disability or medical condition. Our view is that the course is well made, and we noted that, importantly, it is part presented by people with lived experience of disabilities. Collaboration with their members in this way shows best practice as it is integrating organisations and individuals who represent disability with knowledge of the airport and aviation. Using videos relating directly to the airport also will provide staff a more personalised course, rather than generic information about airports and disability. London Luton Airport advised the CAA that this course will be rolled out to staff who provide direct assistance to disabled and less mobile passengers first and then other customer facing staff.

## Service level agreements

- 4.7 Service level agreements (“SLA”) between London Luton Airport and their service provider were provided during the assessment. This SLA includes the number of responses to surveys of disabled and less mobile passengers received. The SLA also includes pre-boarding of departing passengers which is measured by monitoring of delays attributed to the assistance service (for example, airline delay code 19). Both these measures help to ensure that passengers are receiving a high level of service and are boarded on to aircraft in a timely manner and provides an additional level of audit on the assistance provided to disabled and less mobile passengers. CAP1228 paragraph 12 states that in addition to Annex 1 of UK Reg (EU) No. 1107/2006 “there are a number of broader performance measures, including that....subject to pre-notification, 100% of departing customers who are at the designated point within the stipulated time should reach their aircraft in time to enable timely pre-boarding and departure”. Therefore, including this as a measured SLA shows good practice from the airport.

## Website information

4.8 ECAC Doc. 30 Annex 5-C Section 10.1 states that “the airport operator is expected to provide useful information to the public...promoting awareness of the special assistance services or arrangements available” and Annex 5-J covers basic information which should be included on airports’ websites. Section 3.7 covers areas which airport websites should include relating to airport security. During the assessment of London Luton Airport’s website good practice was identified relating to this. Detailed information is provided relating to which situations passengers should tell a security officer about, for example, passengers with diabetes and is formatted in an easy-to-understand Q and A style. Another area of good practice was identified relating to passengers travelling with mobility equipment. ECAC Doc. 30 Annex 5-J Section 3.8 includes minimum requirements in this area, for example “information for owners on preparing mobility equipment for carriage”. The website goes beyond this by including a link to the British Healthcare Trade Association (BHTA) website which provides information on different makes and models of devices in a consistent format which can be used by passengers to pass details to the airport or their airline.

## Parking for blue badge holders

4.9 London Luton Airport offers disabled and less mobile passengers with a blue badge, 30 minutes free in the terminal car parks. These car parks are the closest to the terminal, and the arrangement can be organised on the day using the car park operator’s office or passengers can use the help button by the car park barrier. Arrangements are available for passengers who need to take their blue badge away with them rather than leaving it on the dashboard. This information, and the relevant contact details for the car parking operator, were easily found on London Luton Airport’s website.

## Annex 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 a representative from London Luton Airport. The questionnaire was reviewed by the CAA before the site visit.</p> <p>Interviews and follow up interviews were conducted with representatives from London Luton 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>	<p>Interviewed:</p> <p>N/A</p> <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 were conducted with representatives from London Luton Airport and Wilson James.</p> <ul style="list-style-type: none"> <li>▪ System demos (included walking through the journey for an arriving and departing passenger on a PDA).</li> </ul>

Area	Topics Covered	Work performed
4. Compliance Review	Website review	<ul style="list-style-type: none"> <li>▪ Further explanation of processes and policies.</li> <li>▪ Explanation of facilities and future development plans.</li> </ul> <p>A desk top review conducted by the CAA.</p> <p>London Luton Airport's website in line with guidance on website in ECAC Doc. 30 Annex 5-J.</p>