

# Airport accessibility performance report

## 2023/2024

CAP 3006

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# Contents

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Executive Summary	4
Introduction	7
Review of the year	8
Annex 1 – Definition of rankings	14
Annex 2 - Background	17
Annex 3 – Airport ratings – accessible for screen readers	18

## Executive Summary

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The UK Civil Aviation Authority (CAA) is responsible for the enforcement of Assimilated Regulation (EU) No. 1107/2006 concerning the rights of disabled and less mobile persons when travelling by air (“UK Regulation (EU) No. 1107/2006”). This legislation is intended to ensure that disabled and less mobile passengers 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.

This is the CAA’s seventh annual airport accessibility report. It is compiled against a backdrop of an increasing demand for the assistance service at UK airports. Data that we collect shows that across UK airports 1.69% of passengers seek support from staff in airports in order to help them travel. This has increased from 0.94% in 2010 and 1.35% in 2019. For some airports, over 2% of passengers requested assistance in 2023. In real passenger numbers, this equated to 4.45 million requests for assistance either departing, arriving, or connecting at a UK airport during the reporting year. This is an increase of 21% on the 3.68 million passengers who requested this assistance in the 2022/23 reporting year. In the calendar year 2023, 86.4% of requests for assistance were for people who are less mobile and need assistance around the airports, but do not have more complex needs (often elderly passengers); 5.7% were for people with more complex physical needs, often using their own wheelchair; and 7.9% were for people who are blind, deaf or have another invisible disability.

A comprehensive understanding of the reasons behind this increase is not clear at this point, but there are a number of possible explanations:

- Office of National Statistics (“ONS”) research<sup>1</sup> shows that holidays and visiting friends and relatives (“VFR”) were the most common reason for overseas visitors visiting the UK and for visits abroad by UK residents in 2023 and that this type of travel has almost fully recovered from pre-pandemic levels. Conversely, business travel, where passengers are historically much less likely to request assistance, has

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<sup>1</sup>Office for National Statistics (ONS), released 17 May 2024, OCS website, article, [Travel trends: 2023](#)

not recovered to the same extent. This provides one possible explanation for an increase in the proportion of passengers requesting assistance at airports.

- A further factor could be an increase in disabled people within the population, primarily driven by an aging population. The Department for Work and Pensions<sup>2</sup> reported that the number of disabled people<sup>3</sup> in the UK increased by 32% (3.9 million between financial years 2012/13 and 2022/23). 24% of people in the UK are now classified as disabled, compared to 19% in 2012/13. We also believe that passengers may be more inclined to request assistance than they were pre-pandemic, possibly as a result of a greater awareness of the assistance services provided. Results from the CAA's Aviation Consumer Survey 2023<sup>4</sup> ("the Consumer Survey") found that three in ten people identifying as having a disability are more likely to request assistance than they were pre-pandemic.

Conversely, however, the Consumer Survey also states that compared to 2019, fewer disabled passengers have flown in the past twelve months (-3%) and less people aged over fifty-five have flown (-11%). The Consumer Survey also suggests satisfaction has generally deteriorated since 2019. Satisfaction with the overall travel experience declined by 8% for those with a disability between November 2019 and October 2023, with 74% of disabled passengers satisfied, compared to 79% for non-disabled passengers (which showed a decline of 5%). Further, the gap in satisfaction between disabled passengers and non-disabled passengers has increased since 2019 at every single customer journey touchpoint except passport control and immigration.

This report is therefore written against a backdrop of operational demands on airlines and airports, with a significant increase in demand, and a general drop in satisfaction with performance.

It assesses the twenty-eight airports who handled over 150,000 passengers in the calendar year 2023 against the quality standards framework and covers performance over

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<sup>2</sup> [Family Resources Survey: financial year 2022 to 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

<sup>3</sup> The definition of disability used by the DWP is consistent with the core definition of disability under the Equality Act 2010.

<sup>4</sup> [UK Aviation Consumer Survey | Civil Aviation Authority \(caa.co.uk\)](https://www.caa.co.uk)

the year 1 April 2023 to 31 March 2024. Ratings for the twenty-eight airports break down into the following categories:

- Eleven airports fell into the ‘very good’ category;
- Twelve airports fell into the ‘good’ category; and
- Five airports were rated as ‘needs improvement’.

We are pleased that no airports have fallen into the ‘poor’ category. However, it is disappointing that some airports are in the ‘needs improvement’ category, including London Gatwick and Bristol. London Gatwick’s accuracy of data recording and reporting to the CAA has not met the requirements for a ‘good’ rating and performance for the waiting time metrics for arriving passengers at Bristol was below the standards set out by the CAA in CAP 1228<sup>5</sup>.

A number of airports have not consistently followed CAA guidance in regard to obligations on surveying passengers and convening accessibility forums. When we reviewed our guidance in 2019, there was strong support from most stakeholders about a need to give greater weight to both the surveying and consultation with disability groups parts of the framework. We therefore put greater emphasis on these areas in the updated version of the framework which we published in April 2019, underpinned by strict guidelines on how surveys and consultation should be carried out. For those airports that have not met these guidelines in full, their rating in this year’s report reflects this. We will continue to take this approach to assessment of ratings when we report next year.

For the first time, alongside the publication of this annual report, we are also publishing the results of our deep dive accessibility assessments of airports undertaken throughout the reporting year<sup>6</sup>. We have carried out these assessments for a number of years but have not until now published the results. We hope that publication of the results will help drive airports to continue to improve accessibility on areas which go beyond the scope of the airports quality standard framework, and also to showcase the best practice we often observe. It will provide valuable information for consumers on accessibility at individual airports. This year we assessed London Heathrow, London Stansted, and London Luton.

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<sup>5</sup> [CAP 1228 \(caa.co.uk\)](https://www.caa.co.uk/cap1228)

<sup>6</sup> Assessment report can be found at [www.caa.co.uk/CAP3006](https://www.caa.co.uk/CAP3006)

## Chapter 1

# Introduction

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- 1.1 In respect of the obligations on airports set out in UK Regulation (EU) No. 1107/2006, the CAA undertakes its oversight work of airports under two main work streams:
1. **Quality standards framework (CAP 1228 and CAP 1228A<sup>7</sup>):** a standardised method of assessing UK airports in the provision of assistance to those with accessibility needs. The CAA reports annually against the framework.
  2. **Periodic “Deep Dive” accessibility assessments of individual airports across the UK:** These assessments review all aspects of the airports provision of assistance to disabled and less mobile passengers against their obligations set out under UK Regulation (EU) No. 1107/2006 and all key guidance associated with this. To improve transparency and promote good practice, starting from the 2023/24 reporting period, the CAA is publishing airport assessment reports on an annual basis alongside the annual assessment against the quality standards framework. Over the 2023/24 reporting year the CAA has conducted assessments of London Heathrow, London Luton, and London Stansted.
- 1.2 This report is the annual assessment of airports for the 2023/2024 reporting year against the quality standards framework. Details of the assessment criteria and more information on the three areas can be found at Annex 1 and background on the framework at Annex 2.
- 1.3 Airports are assessed against the quality standards framework in three areas:
1. Performance against waiting time targets for arriving and departing passengers. This includes accurately and robustness of data collection.
  2. Surveys of users of the assistance service.
  3. Consultation with disability groups and organisations.

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<sup>7</sup> [CAP1228A](#)

## Chapter 2

## Review of the year

- 2.1 The rankings for the 2023/24 reporting year are below. The definition of rankings is set out at Annex 1 and a version of the table below accessible for screen readers can be found at Annex 3.

	Aberdeen	
	Belfast International	Belfast City
	Birmingham	City of Derry
	Bournemouth	Cornwall Newquay
	Edinburgh	East Midlands
	Exeter	Glasgow
	Inverness	Glasgow Prestwick
Bristol	London City	Leeds Bradford
Cardiff Wales	London Heathrow	London Stansted
Liverpool	London Luton	Newcastle
London Gatwick	Manchester	Southampton
Norwich	Sumburgh	Teesside
<b>Needs Improvement</b>	<b>Good</b>	<b>Very good</b>

## Performance against waiting time targets

- 2.2 **Birmingham, Leeds Bradford, London Heathrow, London Luton, London Stansted, and Manchester** have shown improvements in their performance against waiting time targets from their ratings in the 2022/23 reporting year.
- 2.3 Manchester has increased the number of staff and equipment in its operation. This has added extra resilience to their operation, reflected in improved performance scores. It has regularly exceeded our targets for a 'very good' standard in this area. In addition, London Luton exceeded 'very good' waiting time targets despite ongoing operational issues caused by a large fire in 2023.
- 2.4 London Heathrow has added significant numbers of staff to their operation which has improved the timeliness of the service. Service levels differ between terminals, with Terminals 2, 4 and 5 exceeding the targets for 'very good'. Terminal 3 has more infrastructure challenges than the other terminals, including level changes which require arriving disabled and less mobile passengers to move between pieces of equipment, as well as an increase in leisure routes



since pre-pandemic years. Leisure (including visiting friends and relatives) routes tend to have a higher proportion of passengers requesting assistance compared to business destinations. We are pleased that London Heathrow has invested in new lifts on the arrivals journey in Terminal 3, in both the arrivals corridors and between the border and baggage reclaim and has trialled new equipment and processes to try and improve performance. Some passengers, despite being assisted off the aircraft in a timely manner, are being asked to wait in an area where they are assisted from one piece of equipment to another. Although there has been some progress through the year, as the infrastructure improvements along with additional staff following the restart after the pandemic are now embedded, we expect the airport to continue to work to improve the timeliness of handovers between equipment and reduce the numbers of passengers that go to this area the waiting time.

- 2.5 For another reporting year, all three Northern Irish airports – **Belfast City**, **Belfast International** and **City of Derry** all exceeded ‘very good’ targets for providing a timely assistance service to passengers over the year.
- 2.6 **London Gatwick** has fallen into the ‘needs improvement’ category in this report. Whilst the airport met the requirements across a range of criteria, monitoring and oversight activity conducted by the CAA has shown issues with the data reported to us by the airport, in particular that it did not accurately reflect the service being provided to arriving passengers. It also found that, while passengers were generally disembarked from an aircraft quickly, the equipment needed to provide the assistance for the full passenger journey was not always waiting for the passenger after they had been disembarked, with some arriving passengers being left for unacceptable periods of time in corridors, sometimes without access to seating and toilets. Despite commitments made by London Gatwick in May 2023 that these issues would be rectified, CAA monitoring of the service during September and October 2023 identified similar issues. We are pleased to note that in the early months of the 2024/25 reporting year the issues appear to have been mainly addressed and we have noted more recent improvements in performance. The CAA will continue to monitor the service and robustness of the data provided to us by London Gatwick in the coming months to ensure that the issues identified remain fully rectified.

- 2.7 **Bristol** has also been rated as ‘needs improvement’ as it did not meet the waiting time targets for a ‘good’ rating. Bristol has taken action to improve their service, including changing their assistance service provider with effect from March 2024 and adding more resources - staff and equipment - to their operation. However, early months of the 2024/25 reporting year show a further deterioration of the service. We expect airport management to urgently address this matter. To not do so risks more formal enforcement action from the CAA, in which we would ask for legal undertakings from the airport, effectively putting the airport under ‘special measures’ until performance improves to an acceptable level.
- 2.8 **Cardiff Wales** has also received a ‘needs improvement’ rating for his area. In Summer 2023, Cardiff Wales moved to an automatic recording system using location-based technology during the year. There were issues with the data recorded while the new system was implemented, and staff were trained. These issues mean that the data reported to the CAA on waiting times was inaccurate between April and September. We are pleased that in the later months of the reporting year, Cardiff Wales has fixed the issues and instigated extensive auditing of their data collection system to ensure it is accurate.

## Surveys of service users

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- 2.9 During the COVID-19 pandemic, some airports paused their surveys of their assistance services. Some also took the re-start of aviation as an opportunity to refresh their system. During the year, the CAA has focused on ensuring surveys of assistance service users are being given the appropriate amount of focus by airports and that these are being conducted in line with the guidance set out by the CAA in CAP 1228.
- 2.10 The CAA worked with airports to ensure that the primary method of distributing the survey was emailing out the survey link to assistance service users, where they are happy to provide their email addresses, and other methods such as handing out survey cards were secondary methods of distribution.
- 2.11 Airports who did not follow requirements set out in CAP 1228 regarding survey distribution for the full year have received a ‘good’ rating for this area. These

were **Aberdeen, Belfast International, Birmingham, Bournemouth, Exeter, Inverness, London Luton, Manchester and Sumburgh.**

- 2.12 We are pleased that with more airports emailing the survey out to passengers there has been a large uptick in responses, even compared to pre-pandemic years. Many airports have also integrated the survey distribution into their IT management systems, adding automation and efficiency to the distribution. In particular, **Glasgow** and **Southampton** have worked to increase their response rates and now have some of the highest response rates proportionally to the number of passengers using the assistance service and scored a 'very good' rating in this area.
- 2.13 **East Midlands** and **Edinburgh** have chosen to host their own survey and provide the CAA with their results. They too have achieved high levels of responses and a 'very good' rating for their scores for both arriving and departing passenger journeys.
- 2.14 Regional airports have also received higher response rates than pre-pandemic years to the surveys. **Belfast City, Cornwall Newquay, Cardiff Wales, Glasgow Prestwick,** and **Norwich** have all achieved high response rates, and achieved a 'very good' rating in this area. It is **Teesside's** first year in the quality standards framework due to recent increases in their passenger numbers and it has also exceeded expectations in terms of response rate and average survey scores for the reporting year.
- 2.15 Only one airport, **Liverpool** did not meet the requirements for a 'good' rating for the survey of assistance service users. The airport received an unacceptably low number of responses (in proportion to the number of passengers requesting assistance) for us to make a fair assessment and award a 'good' rating.

## Consultation with disability groups and organisations

- 2.16 Like the surveys of assistance service users, the COVID-19 pandemic resulted in the pause of consultation forums at many airports, and some were slow to revive their groups. The assessment in this report takes this into account and for this report we have not expected airports to meet all minimum requirements.

However, all airports are expected to meet the full requirements detailed in CAP 1228 for the 2024/25 reporting year.

- 2.17 In the last annual report, the CAA committed to providing additional support to airports to ensure progress in the obligation to consult with disabled passengers and groups. In order to achieve this, a CAA representative has attended forum meetings of the top sixteen airports (by passenger numbers) to observe and allow us to assess further how groups are operating and are being used by airports.
- 2.18 Attending these forums has helped the CAA get an inside look at the administration, structure, and effectiveness of the meetings. Whilst acknowledging that airports are now putting more attention into these forums since the COVID-19 pandemic, there are areas where improvements could allow the forums to be more effective. Again, our ratings in this report for some airports reflect where we think airports have not done enough to ensure proper consultation is carried out, through the recommended method of structured and regular ‘forums’ of disabled passengers and organisations:
1. **Norwich** has received a ‘needs improvement’ rating as it failed to hold any access forum meetings in the reporting year.
  2. **Exeter, Inverness, and Edinburgh** only had one meeting last year. **Manchester** also only had one meeting, albeit this was because the airport took the opportunity to refresh the forum to help ensure accessibility is properly considered as the airport continues to upgrade its infrastructure and facilities in the coming years. All these airports were restricted to a ‘good’ rating as a result.
- 2.19 The CAA will continue to monitor progress throughout this year and provide feedback to airports on where improvements can be made. In particular, airports should consider guidance from the Equality and Human Rights Commission on Engaging with Disabled People<sup>8</sup>. This publication includes a facilitators guide and a planning checklist for arranging events, venue, publicising, final

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<sup>8</sup> [Engaging with disabled people: an event planning guide \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/engaging-with-disabled-people-an-event-planning-guide)

preparations, and on the day. This can be a useful guide for future forums to ensure that their groups are inclusive to members and operate effectively.

- 2.20 Where airports receive a deep dive accessibility assessment from the CAA, the airport is expected to consult with their forum regarding addressing any observations and findings which are found in the assessment, and ensure groups are kept up to date with the next steps. This will ensure their local disability experts are informed and can provide expertise on how the airport can meet and exceed regulatory requirements.
- 2.21 Regarding representation of forum members, some forums still have airport personnel as chairs. We strongly recommend that external and independent disabled individuals chair forums. In addition, representation from pan disabilities at forum meetings is important as it allows for a diversity of lived experience and varied expertise and is an area where there is room for improvement. These are important requirements and we expect airports to have a range of disabilities represented at meetings and an independent chair from a disability group or an individual with lived experience of disability.
- 2.22 We require airports to publish up to date forum dates and meeting minutes on their websites. When reviewed in January 2024, airports had forum minutes from earlier years published, but nearly half did not have the most recent minutes available. An interesting note is that a few airports only hold that year's minutes on the website. We would encourage airports to publish past meeting notes up to an agreed time period. The majority of meeting notes which we did observe were of a good quality, including who was in attendance, clear discussion sessions, and members opinions are acknowledged. However, generally, information on the expectation of the members and Terms of References were not readily available on airport websites, and only three airports have an annual report published on their website.

## ANNEX 1

## Definition of rankings

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### Good

This means the following:

#### Departing passengers

- Over the whole year, 99% of all departing notified disabled passengers and those with reduced mobility are provided with assistance within 30 minutes of making themselves known at a designated point.
- Over the whole year, 99% of all departing non-notified disabled passengers and those with reduced mobility are provided with assistance within 45 minutes of making themselves known at a designated point.
- The airport scores an average rating of 3.5 (where 1 is very poor and 5 is excellent) or better in the satisfaction survey of users.

#### Arriving passengers

- Over the whole year, for at least 97% of arriving pre-notified disabled passengers and those with reduced mobility, assistance is available for each passenger within 20 minutes from 'on chocks'.
- Over the whole year, for at least 97% of arriving non-notified disabled persons and persons with reduced mobility, assistance is available for each passenger within 45 minutes from 'on chocks'. chair
- The airport consistently meets any "continuous journey" standards for arriving passengers individually agreed with the CAA.
- The airport scores an average rating of 3.5 (where 1 is very poor and 5 is excellent) or better in the satisfaction survey of users.

#### Oversight and engagement

- The airport publishes on its website, and submits to the CAA, information as set out in paragraphs 37 and 38 of CAP 1228.

- The airport has robust processes in place for overseeing how it measures its performance; or, where relevant, the CAA has accepted commitments from the airport to strengthen this oversight.
- The airport routinely collects email addresses and sends satisfaction surveys to users of the service, with both physical and 'hidden' disabilities.
- The airport engages effectively with disability organisations through an 'Accessibility Forum'.

## Very good

This means the following:

### Departing passengers

- Over the whole year, 99% of all departing notified disabled passengers and those with reduced mobility are provided with assistance within 30 minutes of making themselves known at a designated point.
- Over the whole year, 99% of all departing non-notified disabled passengers and passengers with reduced mobility are provided with assistance within 45 minutes of making themselves known at a designated point.
- The airport scores a rating of 4 or better in the satisfaction survey of users (where 1 is very poor and 5 is excellent).

### Arriving passengers

- Over the whole year, for at least 98% of arriving pre-notified disabled passengers and those with reduced mobility, assistance is available within 20 minutes from 'on chocks'.
- Over the whole year, for at least 98% of arriving non-notified disabled passengers and those with reduced mobility, assistance is available for each passenger within 45 minutes from 'on chocks'.
- The airport consistently meets any 'continuous journey' standards for arriving passengers individually agreed with the CAA.
- The airport scores a rating of 4 or better in the satisfaction survey of users (where 1 is very poor and 5 is excellent).

### **Oversight and engagement**

- The airport publishes on its website, and submits to the CAA, information as set out in paragraphs 37 and 38 of CAP 1228.
- The airport has robust processes in place for overseeing how it measures its performance; or, where relevant, the CAA has accepted commitments from the airport to strengthen this oversight.
- The airport routinely collects email addresses and sends satisfaction surveys to users of the service, with both physical and 'hidden' disabilities.
- The airport engages effectively with disability organisations through an 'Accessibility Forum'.

### **Needs improvement**

This means the following:

- Over the course of the reporting year the airport has failed to meet all the criteria for a 'good' performance standard. However, the airport has taken the necessary steps during the year to identify the issues with its assistance service and to agree a plan with the CAA to improve its performance.  
Or
- Over the course of the reporting year the airport has failed to provide the CAA with the required information on its performance.

### **Poor**

This means the following:

- Over the course of the reporting year the airport has failed to meet all the criteria for a 'good' performance standard. Further, the airport has not taken the necessary steps during the year to identify the issues with its assistance service and to agree a plan with the CAA to improve its performance.



## ANNEX 2

# Background

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Assimilated Regulation (EU) No. 1107/2006 ('the Regulation') concerning the rights of disabled and less mobile persons when travelling by air provides for a set of rights that apply when departing from and returning to UK airports and on board all flights from the UK and, if on a UK airline, to the UK. The aim of the Regulation is to ensure that disabled and less mobile passengers have the same opportunities for air travel as others, in particular that they have the same rights to freedom of movement, choice and non-discrimination.

With respect to airports, the requirements of the Regulation relate primarily to the assistance that airports must provide to disabled and less mobile passengers to help them move around the airport and board and disembark from the aircraft (usually through a contracted service provider). The Regulation also requires airports to establish quality standards for assistance provided to disabled and less mobile passengers. To ensure that disabled and less mobile passengers can be confident that they will be able to travel and that their assistance needs will be met, it is important that the assistance provided to them is of consistently high quality. It is therefore essential that airports set appropriate quality standards for this assistance to ensure that it is provided to a high standard.

The CAA is responsible for enforcing the Regulation in the UK. We have established an Airport Accessibility Performance Framework for airports to set, monitor and publish a set of quality standards relating to the assistance provided. Guidance ("CAP 1228") for airports on obligations under this framework was published in October 2014, updated in April 2019, and additional guidance supporting CAP 1228 was published in 2022 ("CAP 1228A"). In addition to the quantitative metrics, which relate to the time passengers have to wait to receive assistance on both departure and arrival, we have also included a number of qualitative metrics: first, that airports consult with disability groups and charities when setting quality standards, so that others with a strong interest in disability issues can hold airports accountable; and second, that passengers with a disability or reduced mobility are satisfied with the various aspects of the service they receive by being surveyed so that issues such as staff attitudes can be measured and reported on.

## ANNEX 3

## Airport ratings – accessible for screen readers

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**Five Airports received a ‘needs improvement’ rating for the reporting year:**

- Bristol
- Cardiff Wales
- Liverpool
- London Gatwick
- Norwich

**Twelve airports received a ‘good rating’ for the reporting year:**

- Aberdeen
- Belfast International
- Birmingham
- Bournemouth
- Edinburgh
- Exeter
- Inverness
- London City
- London Heathrow
- London Luton
- Manchester
- Sumburgh

**Eleven airports received a ‘very good’ rating for the reporting year:**

- Belfast City
- City of Derry
- Cornwall Newquay

- East Midlands
- Glasgow
- Glasgow Prestwick
- Leeds Bradford
- London Stansted
- Newcastle
- Southampton
- Teesside