

# CAA Consumer Panel

## Annual Report for the year ended 31 March 2024



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## About the CAA Consumer Panel

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### Who we are

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The CAA Consumer Panel is a small group of independent experts, who bring together deep consumer expertise and experience along with strategic thinking, applying this in a practical way to improve the aviation experience for consumers. Panel members' biographies can be found at the end of this document.

### What we do

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The Panel acts as a non-statutory critical friend, giving expert advice to the CAA as policy is being developed, and making sure the consumer interest is central. The Panel's objective is to champion the interests of consumers.

The key activities of the Panel are to:

- Help the CAA to understand fully, and take account of, the interests of consumers in its policy development and decisions.
- Use existing CAA research, request the CAA undertakes new targeted research, and gather intelligence, in order to understand the aviation consumer experience.
- Provide the CAA with feedback from a consumer perspective on the effectiveness of its policies and practices.

### Our remit

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The Panel focuses on the interests of current and potential aviation consumers. Citizen or community issues, such as noise from flightpaths, do not fall under our remit.

## Chair's Foreword

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Following a few turbulent years in the aviation sector due to the pandemic and its aftermath, recent evidence suggests that over the last 12 months the sector is recovering and passenger demand has risen back to 2019 levels. The Panel welcomes this as a sign of growing consumer confidence, but it is also notable that the profile of passengers has changed since the pandemic, and this will need to be considered by the CAA, Government and the industry. We remain concerned that passengers' satisfaction with their overall travel experience has continued to fall steadily since 2019, with delay, poor customer service and issues at security being the highest drivers in passenger dissatisfaction.

Nevertheless, we are pleased that in 2023 passengers did not experience the same significant level of disruption as they did at Easter 2022, which gained notable press coverage. In our previous annual report, we set out how we worked with the Government, CAA and industry to mitigate the impact of this disruption on consumers and learn lessons. We said that progress had been made, but that the real test would be in summer 2023 and beyond. Looking back on 2023, we are pleased that the industry generally held up against growing demand and avoided a repeat of 2022. This suggests lessons have been learnt, resilience is rebuilding and the sector is adapting to the new normal. That said, there have been some notable disappointing failures in this reporting year which impacted consumers, including the NATS (En Route) technical failure in August 2023 which caused significant disruption, and Border Force e-gates failures in major UK airports in May 2023 and May 2024. The Panel has been working with the CAA to ensure lessons are learned from these disruptive events, including providing input to the Independent Review of the NATS (En Route) failure.

In our last annual report, we said we would continue to support the CAA's work to resolve outstanding complaints against Wizz Air whose customers endured many months of poor customer service and delayed compensation payments. We welcome the CAA's engagement with the Panel, as it took enforcement action to address failings which led to more than 25,000 claims being re-examined and £1.24 million being paid to Wizz Air passengers. While this is a good outcome for consumers, we believe this case illustrates the need for the CAA to have additional enforcement powers, which would have enabled it to take swifter action, and would also act as a deterrent to future non-compliance. We therefore continue to advocate strongly for the CAA to be given these powers as parliamentary time allows.

During 2023-2024, the Panel has continued to deliver on the second half of its September 2022 – April 2024 work programme. This has included inputting into key projects as set out in our last annual report including the CAA's consumer strategy, consumer environmental information, the airline accessibility framework and work on digital accessibility, and the Public Bodies Review. We welcome the findings of the Public Bodies Review of the CAA

that relate to the Panel and consumer interest, which recommended greater engagement from the CAA Board with the Panel Chair, improvements to the CAA's website and the CAA being given effective enforcement powers. In addition, the Panel has input to other areas including the CAA's new overarching strategy, its people strategy and its consumer dashboard. The Panel also responded to the Government's consultation on improving price transparency and product information for consumers.

During this year, there have been a number of senior staff changes at the CAA, with the appointment of joint interim CEOs and a new permanent CEO, as well as the departure of the Consumers and Markets Group Director and recent appointment of his successor. The terms of the Panel Chair and members have been extended, to offer continuity during this period of change.

Finally, given that we have substantially delivered on our September 2022 – April 2024 work programme, the Panel will be publishing a new work programme in Q3 2024. In the meantime, we will continue to work with the CAA on specific areas set out in this report to drive better outcomes for consumers.

We look forward to working with the CAA's new senior leadership and new Government to help navigate the new 'post-pandemic' normal in the aviation sector in the best interests of consumers whilst further embedding consumers at the heart of aviation decision-making.



The Right Hon Jenny Willott OBE  
CAA Consumer Panel Chair

## Chapter 1

# How we work

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## Our aims

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The Panel exists to make sure that the consumer interest is placed at the heart of the CAA's work, helping the CAA uphold consumer choice, value and fair treatment and improve consumer protection outcomes. We want to see markets and regulation that focus on the clear interests of existing and future aviation consumers, and that work well to ensure effective airline competition on price and service quality. This holds true even more so as the sector recovers from the pandemic, returning to 2019 levels of passenger demand and adapts to a new 'post-pandemic' normal, as high levels of trust will power the continued recovery, ensuring consumers feel confident to travel and book ahead. Airports should provide affordable, good quality and consumer-focused service; empowered consumers should be able to make informed decisions about which companies to use; airline services and airport environments should be designed and delivered to ensure accessibility to everyone, and people who may need extra help should be supported to make sure they can effectively access the market. And finally, when things go wrong, consumers should have quick, fair and easy access to redress.

## How we prioritise our work

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The Panel is a small, specialist policy resource for the CAA and delivers high quality, evidence-based advice in a way which is designed to maximise its impact. The Panel therefore prioritises its work carefully, asking five key questions before embarking on any given project:

- Is the issue important for aviation consumers?
- Does it fall within the Panel's remit?
- Is it an area where the CAA is best placed to effect change?
- Is it (or should it be) a priority for the CAA?
- Is it an area where the consumer voice is less understood or not represented which could benefit from additional focus?

The Panel will also prioritise the interests of consumers it considers to be at greater risk of vulnerability throughout its work.

## Chapter 2

# Understanding our impact

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This report covers the year to 31 March 2024, delivering on the second half of our September 2022 - April 2024 work programme which includes: building the evidence base; driving better outcomes for consumers; and influencing future frameworks. Below we set out the work we have undertaken over the year, with our plans for the year to come – including our plans to publish a new work programme in Q3 2024.

We also have a number of important relationships with a range of stakeholders. As well as the CAA, these include industry representative bodies, other regulatory consumer panels and consumer organisations, and third sector bodies. As a small policy advisory body embedded within the CAA, these relationships allow us to work collaboratively and maximise our influence with decision makers. The stakeholders we met with over the course of the year are listed in Chapter 3.

## Building the evidence base

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In order to develop policy that reflects consumers' priorities and needs, and is correctly targeted, a strong evidence base is key. Our work programme committed us to continue inputting to the design of the [Aviation Consumer Survey](#) (the Survey) and other relevant consumer research that is commissioned. In general, this involves providing advice on survey questions and areas to explore, providing feedback on developing outputs, offering insights and analysis on key findings and considering how such findings (and the data that supports them) can be used across the CAA, and more broadly across the aviation sector and Government, to inform policy development.

**Aviation Consumer Survey:** the Panel provided support to the latest wave (wave twelve) of the Survey in Q3 and Q4 2023, working closely with the CAA's appointed consultant Savanta. This included helping shape a number of the questions posed to consumers on their travelling experience in the context of the industry returning to pre-pandemic levels of passenger demand. In particular, the Panel helped review the mix of pre-existing questions and proposed new topical questions<sup>1</sup> to help ensure the Survey had continuity and comparability with previous waves, while also considering emerging trends and possible changes in consumer behaviour. The Panel also input to the final presentation of the results by providing comments on the developing findings. Among other things, the Survey found:

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<sup>1</sup> These included: consumer satisfaction (including on complaints handling), accessibility and the experience of passengers at risk of vulnerability; travel disruption and complaints handling; ATOL protection; the environment and artificial intelligence.

- The proportion of consumers flying in the last 12 months (54%) has risen back to pre-pandemic levels, which is a 23% increase from October 2022. However, the profile of recent flyers is different post-pandemic with older (47%) and disabled passengers (34%) much less likely to have flown recently than in 2019 (58% and 40% respectively).
- 2023 sees flight frequency amongst recent flyers surpass pre-pandemic levels for the first time, with the proportion of passengers sampled who have taken multiple trips in the last year at an all-time high of 70%.
- However, unlike flying frequency, passengers' satisfaction with their most recent flying experience has fallen steadily from 84% in November 2019 to 79% in October 2023. A decline in satisfaction has occurred every year since November 2019, and the cumulative longer-term trend is more noteworthy especially when compared to levels of satisfaction in March 2016, where 9 in 10 consumers (90%) were satisfied with their most recent journey. In addition, satisfaction has declined particularly sharply amongst older (-8 percentage points) and disabled passengers (-8 percentage points) since 2019, which may explain why they are flying less.
- Passengers who were dissatisfied with their travel experience cited delays, poor customer service and issues at security as the highest drivers of dissatisfaction. While cross-industry comparison is difficult, it appears consumer satisfaction is more stable in other forms of UK transport. For example, the Transport Focus National Rail Passenger Survey found that overall satisfaction with the travel experience in the rail industry consistently ranged between 80-83% from 2016 to 2020 in contrast to the steady decrease in aviation. Also, the 2023 edition of the Institute of Customer Service's Customer Satisfaction Index (CSI) found that customer satisfaction is declining faster in aviation than in other forms of transport. The CSI also highlights complaints handling as an area where the aviation industry in particular sees substantial year-on-year declines in satisfaction, aligning with findings from the CAA Survey.
- It is also notable that in the most recent Survey, satisfaction with the overall travel experience has fallen substantially in Scotland (-9 percentage points) and Northern Ireland (-8 percentage points) over the last year.
- Digital confidence continues to be a large determinant of satisfaction, with this digital divide widening since last year, as just two thirds (66%) of recent flyers with low digital confidence were satisfied with their overall travel experience, compared with 80% of those with higher levels of digital confidence.

After the results were published, Savanta presented the results to relevant colleagues across the CAA, including teams working on sustainability, consumer protection and artificial intelligence. The Panel's Chair also attended a Senior Executive meeting where they discussed how the Survey could be used to help prioritise the CAA's work. Survey outputs and data tables were also shared with external organisations with an interest in the data to help inform their work. This increased focus on ensuring better use of the Survey



data across and beyond the CAA. The Panel will continue to provide expertise and challenge to the development of the Survey for future waves.

**DfT research on consumer environmental information:** in 2023, the Panel helped shape and [responded](#) to the CAA's call for evidence on consumer environmental information (CAP 2395) to ensure it has a strong consumer focus. In our response, we strongly recommended that further qualitative research should be undertaken to test and cross-check various options with consumers on how environmental information could be presented, focusing on which option(s) consumers find easiest to understand. We said that such research would not only allow the CAA to gain a better understanding from consumers directly on what methods of presentation work best for them and the impact such methods might have on their purchasing behaviour, it could also strengthen the CAA's evidence base and mitigate against the risk of unintended or negative consequences.

We are pleased that our advice was taken on board, and that the Department for Transport (DfT) decided to undertake further research to explore the effect of carbon labels on consumer flight choices. The Panel input to this research, which helped ensure a consumer focus and that accessibility was taken into account.

**Digital accessibility:** in 2023, the CAA undertook a digital accessibility audit of airlines' websites, which was largely prompted by the Panel's focus on the risks around digital exclusion in its work programme. The Panel helped shape the audit and attended "speed dating" sessions which provided the CAA, airlines and Panel members with first-hand insights on how consumers with different accessibility needs use airlines' websites and allowed them to interact directly with consumers. While anecdotal, this evidence is a powerful tool in raising awareness of a generally less-understood area of accessibility. It also demonstrates the wide-ranging, complex and sometimes conflicting accessibility needs that consumers might have, which underlines the need to build a robust consumer evidence base in this area. Among other things, the audit:

- Found that no airline fully delivers on accessibility across the entire consumer journey whether that is in regard to technical Web Content Accessibility Guidelines (WCAG) compliance or key aspects of the consumer digital journey. This emphasises the need for airlines to prioritise and enhance their accessibility services to better accommodate passengers on an iterative and ongoing basis.
- Found that airlines' compliance varies considerably across technical WCAG and key aspects of the digital consumer journey, with scores/star ratings varying from very good to poor/below minimum standards. Whilst there are airlines who deliver a very good, good or basic level of accessibility, there are some which are below what is considered to be an acceptable level and urgently require improvement.
- Set out ways that all airlines could improve their accessibility and common themes which drove down some airlines' accessibility scores.

This is the first time the CAA has undertaken a review of the accessibility of airline's digital offerings to consumers. We feel the audit has been a useful step, alongside the inclusion of website accessibility in the CAA's proposed airline accessibility framework, in increasing awareness of the risks of digital exclusion for consumers who increasingly rely on websites and apps as their main point of access to the aviation market. We were also pleased with airlines' generally constructive response to the findings, who committed to taking further action to implement the audit's recommendations. The Panel met with Hassell Inclusion in 2023, who the CAA commissioned to undertake the audit, for a presentation of the findings and a discussion of the outputs and next steps.

The audit's findings add to a growing evidence base (most recently in the latest wave of the Survey noted above) on the importance of digital accessibility and the risks around digital exclusion. We encourage the CAA to continue building its evidence base in this area and welcome the CAA's recognition in the key findings from the audit that its own website needs updating – which is also a recommendation from the [Public Bodies Review](#).

**CAA consumer insight work:** we have continued to make the case for the CAA to conduct a gap analysis and use this to inform decisions on what further targeted research is needed in order to understand the aviation consumer experience. The Panel was involved in discussions with CAA colleagues on how the CAA can make best use of intelligence gathered, as well as how information and data held by the CAA can be usefully presented to consumers to enable greater transparency around industry performance. We have also encouraged the CAA to undertake specific consumer research into attitudes towards innovation and new technologies, which we feel are particularly important areas for the CAA to understand.

**Sharing learning:** we have continued to build good relationships and share learnings with external bodies, including consumer organisations, regulators and other consumer panels, as well as the CAA's Environmental Sustainability Panel. In recent months, members of the Panel attended a UK Regulators Network (UKRN) event on the cost of living and vulnerable consumers in Belfast, met with Which? and the Consumer Council for Northern Ireland to discuss recent developments relating to aviation consumers, including aviation consumer rights, complaints handling and the lived experience of passengers with a disability as well as the Airport Operators Association (AOA) to discuss accessibility, sustainability and airspace. The Chairs of four independent Consumer Panels (including the CAA's Consumer Panel) meet periodically to discuss common areas of interest, which this year included discussions on the impact of the cost of living, social tariffs and Net Zero. The Chair of the Panel was also invited to meet the then Minister for Aviation, Decarbonisation and the Future of Transport Anthony Browne MP to discuss the main issues facing aviation consumers. We were pleased that the Minister recognised the value of the Panel and understood the importance of effective disruption management processes and redress channels for consumers. He also reiterated the need for more effective enforcement powers for the CAA, which the Panel welcomes.

**Concluding comments:** the evidence noted above has helped build a stronger evidence base of consumers' priorities and needs as the industry adapts to a new 'post-pandemic' normal. It has supported the Panel's scrutiny of CAA and Government policy, enabling the development of more effective evidence-based proposals for change where needed. We encourage the CAA to build on this evidence, particularly in the area of digital accessibility and innovation.

## Driving better outcomes for consumers

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The Panel's focus is on improving the aviation experience for current and potential aviation consumers. Whilst a key concern is price, it is also important that accessible, useful, comparable information on quality is available so that consumers are able to make informed comparisons and vote with their feet. Where outcomes are regulated or influenced by the CAA, our aim is to ensure that the consumer interest is reflected throughout the policy development and regulatory design process and as part of monitoring and enforcement. In particular, the needs of consumers at risk of vulnerability should be taken fully into account so they are able to participate in the market effectively, and we believe consumers need to be able to seek quick and fair resolutions when things go wrong, with complaints data used systematically by industry to inform improvements over time.

**Wizz Air enforcement action:** in our last annual report, we said we would continue to support the CAA's work to resolve outstanding complaints against Wizz Air whose customers endured many months of poor customer service and delayed compensation payments. The Panel and CAA had serious concerns over Wizz Air's high volume of outstanding complaints and failure to meet passenger rights obligations and rerouting policies. We welcome the CAA's engagement with the Panel in this area, including on making best use of its existing limited enforcement powers where this benefits consumers and that the CAA took enforcement action to address these failings. This action led to more than 25,000 claims being re-examined and £1.24 million being paid to passengers as well as undertakings which required Wizz Air to make changes to its policies to ensure that in the future, it consistently complies with its re-routing and care obligations. While we welcome this outcome, we strongly believe the CAA would have been able to take swifter action if it had better enforcement tools, similar to those of other regulators.

**Independent NATS (En Route) Review:** we also engaged with the independent review of NATS (En Route) that the CAA commissioned following the major disruption incident in August 2023. The Panel provided comments on the terms of reference for the independent review panel and advised on options for gathering views from affected passengers. It was considered that the Panel could offer useful insights due to our expertise in complaints handling in aviation and other sectors, and involvement with previous occurrences of mass disruption. The interim report, published in March 2024, included reference to the need for effective consumer representation and the difficulty the review team experienced in gathering views from affected passengers. The Panel agrees with both these points and

will continue to engage as recommendations are finalised, which was ongoing at the time of writing this report.

**Sustainability and the environment:** as noted above in Chapter 2, the Panel helped shape and responded to the CAA's call for evidence on consumer environmental information (CAP 2395) and input to consumer research on environmental labelling undertaken by DfT. The Panel has provided feedback and direction to the project team on an ongoing basis, particularly on an upcoming CAA consultation on draft principles and options for the progression of this work.

The Panel Chair has also met with the Chair of the CAA's Environmental Sustainability Panel to discuss ways of working and future opportunities for joint working, with Panel Secretariats meeting regularly and discussing potential future areas of joint working, such as greenwashing.

**PACT:** in the last annual report, we noted that a joint workshop was held between the CAA's Passenger Advice and Complaints Team (PACT), the Consumers and Markets Group (CMG) and the Panel to consider how the consumer complaints handled by the CAA could be used to drive industry improvements, and how the CAA could bring about greater airline and airport accountability, and more efficient and effective complaint resolutions. A further workshop was held in summer 2023 between the Panel, CMG and PACT to update on progress, help identify opportunities for improvement and consider the overlap with CAA work to improve the customer experience. Since then, the Panel understands there has been greater collaboration between PACT and CMG which we welcome, and the Panel Chair has been engaging with the Director of the CAA's Professional Services Group in this area. We look forward to further engagement between PACT and the Panel over the next year.

## Influencing future frameworks

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The Panel recognises that the last few years have been turbulent in the aviation sector due to the pandemic and its aftermath. With passenger demand hitting pre-pandemic levels, the sector now appears to be beginning to settle into a new 'post-pandemic' normal. At the same time, sustainability and emerging innovative technologies have also been rapidly evolving, both of which will have a huge impact on consumers.

In addition, the last reporting year has brought about a number of changes for the CAA and Government with recommendations from the Public Bodies Review, and senior Executive changes at the CAA and the recent announcement of the General Election. Within this context, we have sought to improve outcomes for consumers by helping to ensure the right frameworks are in place.

Over the last year, the Panel has engaged on a wide range of topics. We are pleased that the Panel's visibility and impact is extending to a wider range of areas across the CAA, and that less obvious policy areas are considering the consumer interest at an earlier

stage. While this is an ongoing process, we welcome efforts to help build the Panel's impact and visibility across the CAA and externally. More specifically, the Panel has helped influence the following future frameworks:

**Public Bodies Review:** in the Panel's last annual report, we noted that we responded to the Government's call for evidence on the effectiveness and efficiency of the CAA. The Panel Chair also met with the independent lead reviewer on three occasions to discuss topics including how well the CAA carries out its consumer related functions and engages with the Panel. Among other areas, we reiterated our strong support for the CAA being given effective enforcement powers and mandating Alternative Dispute Resolution (ADR) in the aviation sector. We also said that we consider the CAA generally engages effectively with the Panel as part of a mature, open and constructive two-way dialogue built over several years. Where issues arise, the CAA has demonstrated that it is open to working through these and taking appropriate steps to address the Panel's feedback.

The Public Bodies Review has since concluded and made a number of recommendations relating to the Panel and consumer interest, which we welcome. These include:

- The CAA's new consumer strategy should be approved by the board by 30 September 2023 and should be shared with the DfT and, ideally, published on the CAA's website. This strategy should include a commitment to invite the Chair of the CAA's Consumer Panel to a minimum of 2 Board meetings per year, and for that person to be sighted on all Board agendas to enable them to indicate items that are likely to be particularly relevant to consumers.
- One of the CAA's Non-Executive Directors (NED) should engage on a regular basis with the Chair of the CAA's Consumer Panel.
- The CAA should update its website, considering the views of stakeholder groups, including CAA customers and aviation consumers, to improve user experience and enable all stakeholders to more easily navigate, access and understand information, relevant guidance and policies.
- Contingent on the CAA optimising the use of its current consumer protection powers, and demonstrating that it is doing so, Ministerial consideration should be given to providing the CAA with additional powers to more effectively regulate (in the interest of consumers) where it considers that an aviation related business has breached consumer rights law:
  - to make directions to remedy such infringements or stop them from happening in the future.
  - to impose financial penalties, where appropriate.

We welcome the level of engagement from the Review with the Panel, and the weight that it put on the Panel's views in making its recommendations. We also welcome the fact that the [CAA is already taking steps](#) to address the recommendations in the review, with some recommendations already implemented at the time of drafting this report.

**New CAA Strategy:** the Panel engaged with the CAA on the development of its new strategy. The previous iteration of the strategy focused on enabling the CAA to support the recovery of the industry in the wake of the pandemic, on which the Panel provided input. Now that UK passenger numbers have recovered, the CAA has evolved its strategy in line with the sector's everchanging demands and has refocused on its core values, reflecting the recommendation from the Public Bodies Review. The new strategy:

- underpins the CAA's vision to enable a safe, secure and sustainable aviation and aerospace sector while protecting consumers and the public; and
- aligns with other separate sub-strategies the CAA is developing including for consumers, customers, people and AI.

We are pleased to see the CAA's overarching strategy evolve to include clear commitments to the consumer strategy and a new mission that clearly puts consumers at the forefront of its work. The Panel was pleased that the new strategy was presented in a clear and transparent format, which would help consumers better understand the CAA's work.

**Consumer Strategy:** we worked closely with the CAA on the development of its consumer strategy, published in September 2023. We are delighted to see a dedicated consumer strategy from the CAA, which provides further opportunity to hold the CAA to account for its role in addressing potential consumer harm as well as a chance to celebrate when CAA action has had a clear, measurable impact on aviation consumers. The Panel was particularly pleased to see the CAA make direct reference to the Consumer Principles, a set of criteria by which policy makers can and should frame their approach to consumers. Following publication, the CAA sought advice from the Panel on the monitoring and recording of key activities contained in the strategy. A consumer outcomes dashboard is in development and the Panel stressed the importance of ensuring that the data demonstrates passengers' experiences, capturing where possible the outcomes for passengers and not merely the completion of an action. We also requested that further thought be given to how this could be developed into a tool for consumers to use, combining CAA activities with information about industry performance.

**Improving price transparency and product information for consumers:** as part of the Government's "smarter regulation" review, a consultation was released to gather views on, amongst other topics, the extent to which the existing law protects consumers from drip pricing and whether more should be done to ensure transparency. The consultation gave examples from aviation of how the cost of a service can escalate with the addition of extra items, such as allocated seating. The Panel has been vocal in the past on the issue of seat allocation and our response referenced this, but also highlighted that there is already legislation in place to ensure the price advertised is achievable. In our view, any legal change in this area must recognise the value of offering a basic service with the opportunity to add optional extras, as this enables wider access to aviation by making lower prices possible. The Panel added that there would be value in reviewing whether all

additional costs are genuinely optional, and reiterated the need for the CAA to have stronger powers to enforce the consumer protection legislation that already exists in this area.

**Airline accessibility framework:** the Panel strongly supports the CAA's proposal to put in place a performance framework for airline accessibility and believes that it has the potential to significantly improve the overall experience for disabled and less mobile passengers. Following the publication of the CAA's consultation (CAP 2486), the Panel conducted a workshop with the CAA to consider the specific details in depth. The Panel emphasised the importance of placing passengers' needs at the heart of the framework and urged the CAA to be ambitious when defining the criteria against which airlines will be assessed. The Panel also suggested a review of the language used to ensure the framework focused on inclusivity rather than processes and recommended that phrases such as 'reasonable efforts' should be clarified to avoid any doubt over the CAA's expectations. Further engagement on how to rate and rank airlines will take place when the proposals progress further.

**Innovation:** in 2023, the Panel input to the [Law Commission's project](#) looking at autonomy in the aviation sector. The Panel's Secretariat undertook pre-engagement with the Law Commission and a workshop was held to discuss the potential impact that increased automation could have on aviation consumers. Members also set out views on whether current consumer legislation is ready for greater use of automation, identifying possible gaps, uncertainties and opportunities. The Panel plans to engage further with the Law Commission and respond to its call for evidence. We look forward to continuing to input to this project over the coming months, which we consider could have important implications for consumers.

**Other frameworks:** the Panel input to an early iteration of the CAA's Artificial Intelligence (AI) strategy, customer strategy and people strategy as well as on ATOL reform. In particular, the Panel highlighted that the CAA's people strategy should take account of the CAA's role as a consumer regulator.

## Priorities for 2023 - 2024

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In recent months, the terms of the Panel's Chair and some Panel members terms have been extended to ensure continuity at a time where there have been significant changes in the CAA's Senior Executive. We have now substantially delivered our September 2022 – April 2024 work programme, along with new additions due to the changing external context. In Q3 2024, we will set out a new work programme that takes account of the changing regulatory and legislative landscape following the General Election and new priorities as part of the new 'post pandemic' normal. In the meantime, we will continue to focus on:

- Ensuring relevant recommendations from the Public Bodies Review are implemented.

- The CAA's AI strategy and the Law Commission's work on autonomy in the aviation sector.
- The Independent NATS (En Route) Review.
- Economic regulation, including a lessons learnt review of the CAA's Heathrow and NATS (En Route) price controls.
- Continuing to work with the CAA to make sure it retains focus on the consumer interest throughout its work.
- Ensuring the needs of those at risk of vulnerability are recognised and prioritised.
- Supporting the CAA's call for more effective consumer enforcement powers and helping shape how this could best be delivered by the new Government, and at the same time working with the CAA to help it make the fullest possible use of existing powers where this benefits consumers.



## Chapter 3

# Transparency

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## Expenditure

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The Panel cost the CAA £ 76,039.20 in Chair and member fees and expenses in the year to 31 March 2024.

## Panel meetings

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In the year ending 31 March 2024, the Panel met formally four times. The minutes of these meetings are published on the [CAA website](#). In addition, a number of sub-groups of the Panel worked on individual workstreams throughout the year aligned to the Panel's work programme including: the Aviation Consumer Survey; consumer vulnerability and accessibility; and environmental sustainability. The Panel also works in an agile and flexible manner across the CAA to help colleagues understand the consumer interest in their particular policy area and responds to requests for written feedback as they arise.

## Terms of Reference

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The Panel's [Terms of Reference](#) are published on the CAA website.

## Working with stakeholders

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The Panel primarily interacts with the CAA, providing advice and engaging with staff at all levels. In 2023-2024, as part of its work with stakeholders the Panel also engaged with:

- Airport Operators Association
- Airlines UK
- Communications Consumer Panel
- Consumer Council for Northern Ireland
- Hassell Inclusion
- Minister for Aviation
- Financial Services Consumer Panel
- Legal Services Consumer Panel
- UKRN
- Which?

## Chapter 4

# Panel members and secretariat

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## Chair

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### **Rt Hon Jenny Willott OBE, Chair**

Jenny was appointed to the Panel in January 2018. Jenny was a Member of Parliament for Cardiff Central for ten years, serving as Consumer Affairs Minister, with responsibilities including consumer policy, competition policy and employment law, Women and Equalities Minister and as a Government Whip. She is now the Chief Executive of the charity Re-engage and a Non-Executive Director of SELCAT multi-academy trust. She was formerly the Director of Enterprise and Innovation at St Mary's University, Twickenham, and until December 2020 was a Non-Executive Director for the Independent Parliamentary Standards Authority. Prior to entering Parliament, she worked in the voluntary sector, including as Chief Executive of Victim Support South Wales and Head of Advocacy for UNICEF UK.

## Members

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### **Carol Brennan**

Carol is an Honorary Reader in Consumer Policy and former Director of the Consumer Dispute Resolution Centre at Queen Margaret University, Edinburgh. Carol was appointed to the Panel in October 2018. She recently completed a six-year term as a member of the Office of Rail and Road (ORR) Consumer Expert Panel. She is Chair of the Qualifications and Awards Panel for the Chartered Trading Standards Institute. Carol has also worked with BEUC, the European Consumer Organisation, to moderate consumer education events. Between 2015 and 2019, Carol was Chair of the Scottish Legal Complaints Commission Consumer Panel. During 2019/2020, Carol chaired a team of experts on consumer education and produced a policy options paper for the European Commission. She is a member of the Queen Margaret University Association Committee. Her research interests include consumer policy, complaint management, dispute resolution, consumer empowerment and customer experience. Carol draws on her research to influence new developments in strategy, policy and practice.

### **Helen Dolphin MBE**

Helen is a committed campaigner on improving transport for disabled people. After becoming disabled in her early twenties, Helen trained as a journalist and worked for ITV Anglia News as a news reporter. She followed this by taking up the role of Director of Policy and Campaigns for a national disability charity. Helen now works as an independent

mobility specialist advising Government, public, commercial and professional bodies on how to improve accessibility. She is currently working for Great British Railways Transition Team as the Engagement and Consultation Lead for the National Rail Accessibility Strategy. Helen is a member of the Disabled Persons Transport Advisory Committee (DPTAC), Joint Chair of the Heathrow Access Advisory Group, Chair of the Motability Consumer Panel, Chair of East Midlands Railway Inclusivity Group and a Member of the National Centre for Accessible Transport Advisory Committee.

### **Jennifer Genevieve**

Jennifer is a Deputy Director at the Office of Road and Rail, with responsibility for the ORR's Periodic Review of Network Rail. She has worked on economic regulation, competition policy and consumer protection within sector regulators and industry in roles spanning the rail, aviation, water, financial services, telecoms and broadcasting sectors. She was previously Head of Stakeholder Engagement & Policy at Thames Water, leading work on the business planning process for the industry price review. She has also worked on the setting of charges at airports across Europe as Head of Airport Regulation and Policy at easyJet. Jennifer served for six years as a member of the Financial Services Consumer Panel. She also previously worked in strategy and competition policy at Ofcom.

### **Rick Hill MBE**

Rick has had a varied career in both the voluntary sector, film/tv industry and media regulation. Chairman of Northern Ireland Screen Commission 2008-2013, he took the lead role in developing digital content, supporting new programme and delivery formats in the film/tv sector. Rick has also worked in consumer advocacy. He was Chairman of the General Consumer Council for Northern Ireland, a member of Consumer Focus UK Board and Chairman of the Scottish Government Consumer and Competition Working Group. He was Deputy Chairperson of the Independent Press Standards Organisation until 2020, and until recently Communications Consumer Panel Chairperson and the Northern Ireland Member. Rick also chairs the Telecoms Industry Forum and the UK Communications Consumer Forum.

### **Jacqueline Minor**

Following a short period lecturing in law at the University of Leicester, Jacqueline Minor joined the European civil service, first at the Court of Justice and subsequently at the European Commission. After more than 20 years' working on Internal Market issues, including a period as Director responsible for Consumer Policy, she served as Head of the Commission's Representation in the UK from 2013 until retirement in 2017.

### **David Thomas**

David is a chartered accountant and an economist. He was appointed a specialist panel member at the Competition and Markets Authority in 2017 and in 2018 a member of competition and enforcement decision committees at the Payment Systems Regulator and

the Financial Conduct Authority. Since 2016 he has run his own consulting practice focusing on economics, regulation and disputes, largely in the communications sector. David was a director of competition and regulatory finance at Ofcom where he had responsibility for, among other things, price controls. After leaving Ofcom he established and led KPMG's global economics and regulation practice.

### **James Walker**

James is the founder of [Resolver.co.uk](https://www.resolver.co.uk), a free online complaints service that James grew to help over 18 million consumers a year to resolve their disputes. He has advised the Government on consumer issues and is a Board Member for Consumer Scotland, Collaboration Network and the Dispute Resolution Ombudsman. A winner of Social Entrepreneur of the year, James is a non-executive for a number of start-ups including Rightly and JamDoughnut. His focus is on helping businesses deliver market-leading customer service, while helping consumers understand and exercise their consumer rights. James also has three national weekly consumer columns.

### **Vaughan Williams**

Vaughan is a consumer protection and regulatory lawyer with expertise in industry-based ADR and in regulatory compliance and enforcement. He currently works on redress matters in the Legal Division of the Financial Conduct Authority, and previously worked for a number of years at the energy regulator Ofgem where he was a senior lawyer in the enforcement team. He was previously Principal Investigator at the Telecommunications Industry Ombudsman in his native Australia. Vaughan has also spent time in the community sector, having been Secretary of the Public Transport Users Association in Melbourne and representing that organisation on a number of advisory and advocacy bodies including the working party that established Victoria's Public Transport Ombudsman. He is a supervising lawyer at the Waterloo Legal Advice Service and sits as a magistrate on the South East London bench.

## **Secretariat**

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### **Miranda King (Secretariat July 2023 – January 2024)**

Miranda supported the Panel for 7 months alongside her Sustainability Principal role in the CAA's Strategy and Policy directorate where she currently leads on consumer environmental information. Previous roles include working for the CAA in economic regulation on H7 and competition as well as roles in consumer enforcement and project management.

### **Freya Whiteman**

Freya is a Policy Principal in the CAA's Consumers and Markets Group, assigned to support the Panel. She is an experienced consumer, regulatory policy and legal professional who is passionate about making aviation more accessible for consumers, with

a track record of delivering a number of CAA publications, consumer focused policies and legislative change. Previous roles include working in economic regulation on the H7 price control review to deliver a more consumer focused approach to service quality regulation (Outcome Based Regulation) and modernising the CAA's regulatory toolkit for NATS En Route Plc under the Air Traffic Management and Unmanned Aircraft Act 2021. More recently, she has led on the CAA's airline website accessibility audit.