Civil Aviation Authority

Aviation's response to major disruption

Final Report

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Summary

Background

During the recent snow disruption, over 8,000 flights were cancelled across the UK, affecting almost 1m passengers[1]

2010 was a particularly difficult year for aviation. Severe winter weather conditions at the start of 2010, the prolonged closure of European airspace in April due to volcanic ash, widespread industrial action in the UK and in Continental Europe, and further severe winter weather at the end of 2010, each caused substantial disruption to airport and airline operations and, ultimately, to passengers.

There have been a number of recent studies into how well the UK's transport infrastructure coped with the most recent period of disruption in late November and in December, where heavy snowfall and freezing temperatures caused significant travel disruption across the UK[2]. The Quarmby review[3], published in October 2010 and updated in December 2010, and the inquiry of the Transport Select Committee[4] (TSC), published in May 2011, each considered the impact of the severe weather across all transport modes, including aviation. Both the Quarmby review and the TSC inquiry focused primarily on the operational aspects of winter resilience, with each making a number of recommendations on how industry could respond more effectively to maintain operations during such severe weather events. The Begg enquiry[5], published in March 2011, also focused primarily on the operational aspects of winter resilience, but in this case at Heathrow airport only.

CAA review aviation specific but UK wide

CAA review focused on passenger impacts of major disruption, not just snow

During and immediately following the disruption last winter, the CAA began gathering information and views itself on the impacts of the disruption. Given the nature and scope of the reviews already planned or underway at that time, the CAA chose to focus its work on the issues directly faced by passengers across all UK airports. As our review progressed, it became clear that many of the issues that arose as a result of the recent disruption, in particular in relation to passenger welfare, were not specific to that event, but rather were the result of the knock-on effects of disruption to airport and airline operations more generally. By focusing our work on this general issue of passenger experience during disruption, we have been able to consider the particular issues faced by passengers in greater depth and breadth than has been done previously.

Review complementary to Quarmby, Begg and the TSC

The conclusions and recommendations presented here are therefore complementary to those presented in the reviews of Quarmby, Begg and the TSC, albeit that there are a number of areas of overlap in particular in respect of operational effectiveness of the response to snow.

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[1] CAA estimates based on reported closures of UK airports.
[2] December 2010 was the coldest December in the UK since records began.
[3] "The Independent Review of Winter Resilience" – http://transportwinterresilience.independent.gov.uk/.
[4] "Keeping the UK moving: The impact on transport of the winter weather in December 2010" – http://www.publications.parliament.uk/pa/cm201012/cmselect/cmtran/794/79402.htm.
[5] "The Heathrow Winter Resilience Enquiry" – http://www.baa.com/assets/Internet/BAA%20Airports/Downloads/Static%20files/BeggReport220311_BAA.pdf.

The CAA's review

During and immediately following the severe weather in December, the CAA began gathering information and views for its review of aviation's response to major disruption. The objective of this work was not to attribute blame, but to identify good practice, attribute praise where justified, and where necessary to identify steps that could be taken to improve passengers' experiences at airports during any future disruption. This involved working with all of the parties that are responsible for service delivery at airports.

The initial focus of this work was on gathering information from airports, airlines and ground handlers.[6] However, in order to get a clear picture of the key issues faced by passengers during the disruption, we also collected information from consumer groups and from passengers directly via an online survey[7] and through a small number of passenger focus groups. The CAA would like to thank all of the passengers, consumer groups, airlines, airports and ground handling companies that helped the CAA in this review.

It is clear from information collected by the CAA that this was a particularly challenging period for much of the aviation sector, with the snow disruption affecting the availability of airport infrastructure – as well as the road and rail networks that provide access to airports – and the ability of passengers and staff to reach airports safely. Despite the exceptional efforts of some airport, airline and handling staff to maintain operations and care for passengers, the severe weather caused significant disruption to air transport, notably in the South East and in Scotland, which inconvenienced large numbers of passengers and caused substantial discomfort for many.

In its discussions with industry, the CAA has identified a number of examples of good practice:

- The information provided by a number of airlines on their websites was accurate and accessible.

- Some airlines had websites that supported the rebooking of significant numbers of passengers, without the need to access telephone helplines.

- A number of airlines were able to re-route telephone queries to overseas call centres and, in the case of some tour operators, to high-street outlets, enabling their core call-centre operations to focus on rebooking disrupted passengers.

- Significant numbers of passengers were re-routed and a number of airlines arranged for additional flights and/or capacity to reduce the number of passengers that were unable to get to their final destination.

- A number of airports learned from previous experiences with snow disruption in January and November 2010, which prompted a more effective approach to crisis response and the provision of additional snow clearing equipment.

- Some airports provided care and assistance such as food and accommodation for passengers stranded in airport terminals.

- In a number of cases, substantial numbers of back-office staff from airlines and airports volunteered to help supplement the efforts of passenger-facing staff.

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[6] See Annex B for a list of the organisations that made written and/or verbal submissions to CAA's review.
[7] See Annex A for the background to our passenger survey and the characteristics of respondents.

However, based on information drawn from discussions with consumer groups and from passengers directly via our online survey and focus groups, it is clear that there is considerable room for improvement across the sector:

- In terms of the quality of information available during the disruption, 74% of survey respondents stated that they were dissatisfied with the information they received, with 57% stating that they were very dissatisfied.

- In response to a survey question asking respondents whether they were informed of their rights, 75% said that they were not informed of their rights when their flight was cancelled / delayed.

- In terms of care and assistance, 60% of survey respondents stated that they did not receive any assistance from their airline. 81% of respondents to our survey stated that they were dissatisfied with the assistance they received; with 65% stating that they were very dissatisfied.

Clearly, given that the survey sample is drawn from passengers experiencing the greatest disruption during the period, there is the potential issue of sample bias and it is perhaps to be expected that these passengers will be particularly critical of their experiences. For this reason, we have taken a very careful approach to interpreting the survey data and we do not claim that the responses to our survey are representative of, for instance, all passengers travelling with a particular airline or from a particular airport.

Rather, we have used the information drawn from the survey and from the focus groups to identify the most pressing, priority issues for passengers during periods of disruption across all airports and airlines. In addition to taking a careful approach to interpreting the survey data, we were able to validate the conclusions drawn from this information with a wide cross-section of industry at a roundtable meeting on 17 March 2011.

Areas for improvement

We have identified three areas where performance should be improved. The objective of the improvements is first to reduce the number of passengers affected by any major disruption, and then to improve the care given to those passengers that remain stranded at the airport:

Maintaining operations will reduce the number of passengers affected

- Improved coordination and communication between airports, airlines and ground handlers will help airports **maintain operations** and reduce the number of passengers affected by major disruption.

Giving passengers options will avoid them becoming stranded at the airport

- Where operations are impacted, helping passengers to make well-informed travel decisions, for instance through providing better information on operations at an earlier stage, will help **avoid stranding passengers** at the airport.

Where passengers are stranded, they must be properly cared for

- For those passengers ultimately stranded at the airport, ensuring that airlines **care for passengers** in line with their legal obligations should reduce the degree of discomfort and distress these passengers experience.

Annex C sets out a set of possible solutions which we consider could be implemented by airports and airlines in order to achieve the outcomes described above. However, we recognise that implementation will work best if it is undertaken by stakeholders themselves, working collaboratively, rather than as a result of regulatory intervention.

For this reason, we have undertaken extensive consultation with the industry to determine how best to achieve improvements in performance, building on the expert knowledge and best practice that already exists in the industry and avoiding the risks of a one-size-fits-all approach. This period of consultation has now concluded.

Way forward and next steps

We have agreed with the Airport Operators Association (AOA) and the British Air Transport Association (BATA) that they will establish a Major Disruption Policy Development Group, which will be an industry-led group to facilitate performance improvements in the three areas identified by the CAA, and which will be responsible for identifying and sharing best practice and examples of 'best in class' performance for dealing with major disruption. The full terms of reference of this group can be found in Annex D.

The CAA will remain the principal body responsible for monitoring and ensuring compliance with the relevant legislation and policy. We will conduct a process of review during October 2011 to identify the performance improvements made, and those planned to be made, by airports and airlines and to determine how well the industry is placed to deal with future events that can lead to major disruption (e.g. snow).

Aviation's response to major disruption
Main Report

The remainder of this report presents the evidence, analysis and findings from the analytical phase of our work.

The results are structured around the three areas where we have identified that performance should be improved, namely:

- maintaining operations;
- avoiding stranding passengers; and
- caring for passengers.

These are discussed in three separate sections below.

There are also four annexes:

- Annex A: describes the passenger survey conducted by the CAA.
- Annex B: sets out the stakeholders that responded to the CAA's work.
- Annex C: summarises the potential solutions identified by the CAA to the issues identified in this report.
- Annex D: sets out the Terms of Reference for the Major Disruption Policy Development Group

Maintaining operations

Safety is of paramount importance to the industry and the consumers it serves, and adverse weather can introduce additional risks. The CAA would therefore expect airport operators to make appropriate decisions in accordance with their safety management systems, including decisions on whether to close key areas of infrastructure.

However, it is clear that – subject to these important safety constraints – the performance of the industry in terms of maintaining operations over the disrupted period was highly variable. This was due, in part, to the localised nature of much of the snowfall. For example, despite being less than 50 miles apart, Edinburgh airport experienced approximately 30 centimetres of snow and was closed for over 70 hours at the end of November / start of December, whilst Glasgow airport experienced 12 centimetres and closed for only four hours.

However, not all of the variation in performance can be explained by the differing amounts of snow at each airport. Instead, much of the variability in performance can also be attributed to issues with the structures, procedures and processes in place for governing airfield operations during disruption in general (including, but not limited to, snow clearance). Through comparing and contrasting the information received from different airlines, airports and ground handlers, we have been able to draw out the different approaches taken at different airports and isolate a number of areas where performance could be improved. These are covered in more detail below.

Operational planning and readiness

Roles and responsibilities of airport stakeholders in snow clearance must be clear

Information gathered from industry stakeholders has highlighted a number of areas where enhanced preparation and readiness on the part of the airport, but also on the part of airlines and other stakeholders, would help minimise the impact of potential disruption on operations.

One area where preparation could be improved at a number of airports is in relation to clarity about the roles and responsibilities of airports, airlines and ground handlers in snow clearance, in particular from the areas underneath parked aircraft. All of the airlines that we spoke to felt that this was the responsibility of the airport – indeed many felt they were already paying for this service through their airport charges. However, a number of airports disagreed with this view and instead considered it to be their role to clear snow from the runways and taxiways only.

At different airports it may make sense to take different approaches to snow clearance, and for airports, airlines and ground handlers to agree procedures that best suit each location. However, the roles, responsibilities and priorities underpinning any such agreement must be clear. If they are not - as was the case at a number of airports last winter – there is a significant risk that the airport, airlines and ground handlers will fail to provide the equipment and manpower needed to clear snow effectively.

Based on our discussions with industry, the best performing airports in terms of effective snow clearance were those where the airport had taken responsibility for snow clearance for the entire airfield (and other key areas such as staff car parks). One particular benefit of this approach is that the airport can use its larger snow clearing equipment to clear large quantities of snow quickly from the areas around parked aircraft, working in close coordination with airlines and ground handlers.

Another area where preparations could be improved is in relation to 'tactical' readiness. One airport commented that heavy snow should not be viewed as a crisis, as it can be foreseen well in advance. Indeed, a number of airports and airlines commented that weather forecasts in mid-December were predicting the freezing temperatures and heavy snowfall a number of days before the event. As observed by a number of industry stakeholders, there is often a window of opportunity for airports and airport stakeholders to take certain actions to prepare for the risk of a major weather event, such as that experienced last winter.

Discussions with industry have revealed that one such key action is the early initiation of crisis command and control structures. Those airlines and airports that pre-empted events by initiating their command and control structures early felt that, by bringing key decision makers together before the event, they were able to put in place specific contingency measures (for instance changes to staff rostering) that reduced the overall impact of the weather on operations.

In addition, these stakeholders considered that, in general, early initiation of the crisis response facilitated a heightened state of readiness across the organisation by signalling that the next period of operations might not be 'business as usual'. This enabled difficult decisions to be taken at short notice. A number of airlines remarked that the best performing airports in terms of mitigating the disruption left their crisis command and control structures in place even after the disruption had eased at the airport. One reason given for this was that weather disruption is rarely isolated to one airport, and disruption elsewhere can lead to knock-on effects for some time after the initial event.

Communication between airport stakeholders

As is shown later in this report, information on the operational status of airports and flights is key to passenger decision making. However, a prerequisite for passengers having access to consistent, timely and accurate information is that it is first available to all airport stakeholders. Through our discussions with airports, airlines and ground handlers, it is clear that effective structures for sharing operational information between airport stakeholders were not in place at all airports during the disruption last winter.

Airport and airline processes and procedures should be aligned to allow streamlined information flow between them, especially in relation to cancellations and delays

In some cases, the breakdown in communications arose as a result of incompatible systems and/or procedures. One airport informed us that although it updated its own website in real time to reflect cancellations, it did not always have visibility over which flights were cancelled by the airlines and that it could take some time for correct information to reach it. It was explained that this was due to the complicated procedures in place for sharing information between the airport, its airlines and other relevant parties. Clearly, where this is the case, processes and procedures should be aligned to allow information flows to be streamlined, in particular on the operational status of flights (i.e. on-time, delayed or cancelled).

Crisis command and control structures should give particular priority to information sharing and joint decision making

Another key area where communication between airports, airlines and ground handlers was not always effective last winter was in direct, face-to-face communication. In our discussions with airlines and ground handlers we have found that the command and control structures designed for dealing with, in this case, snow clearance were not always suitable for sharing a broader range of information, such as that needed to coordinate the response of all airport stakeholders.

Our discussions with industry have highlighted a number of areas of best practice in this regard:

- Purpose – those airports where information was most effectively shared between airport stakeholders were those that had given a particular priority to information sharing in the design of their crisis command and control structures.

- Timing – those airports that initiated their crisis command and control structures early were more effective in putting in place contingency arrangements before the event occurred (as described above).

- Membership – the airports where information sharing was the most effective last winter were those that enabled a broad range of stakeholder to participate in the crisis command and control structures. This included key operational decision-makers from the airport, airlines and ground handlers. Ideally this would also include representatives from other transport modes (road and rail), UK Border & Immigration Agency, police and also airport retail staff (from food outlets in particular).

- Structure – regular face-to-face meetings and information updates were preferred by airport stakeholders, supported by good communications infrastructure (e.g. teleconference facilities).

- Location – a number of airlines and ground handlers remarked that locating meetings in areas with a good view of the airfield improved the awareness of events.

- Dissemination of information – it was noted by a number of airports, airlines and ground handlers that the dissemination of information to airport stakeholders was most effective if all relevant information was passed through a single point of contact, i.e. the airport. It was felt that this avoided the need for each organisation to separately cascade information to its own staff.

Based on our discussions with industry it is clear that airport stakeholders were able to develop the most effective joint response to the disruption where they shared the same information on the operational state of the airport, and on the constraints under which each stakeholder was operating (e.g. crew hours, aircraft position, etc).

Decision making on airport closure / re-opening

Airlines place significant value on certainty in relation to airport closure / re-opening

In terms of the decision of whether to close or re-open an airport, airlines valued certainty highly during the recent disruption. In contrast, our discussions with some airports generally revealed a preference on their part to 'pause' operations for an

unspecified (assumed short) period of time while snow was cleared, rather than shut down operations for a longer, but more certain, period.

In our discussions, airlines stressed the significant logistical challenge of operating an airline during a period of disruption and the long lead times often needed to take decisions, in particular in relation to long-haul flights. For these reasons, a number of airlines have expressed the view that the benefits from retaining flexibility to restart operations if conditions improve can easily be outweighed by the consequences of being too optimistic about when operations might recommence, including the impact of uncertainty on airlines' ability to plan and deliver an updated schedule.

Clearly there is a balance to be struck in relation to this issue. The decision taken by one airport last winter to pre-emptively shut down operations was considered by many airlines to be the right one to make. However, the choice by this airport to shut down operations on the basis of a weather forecast was controversial at the time and could have attracted significant criticism had the conditions been significantly better than forecast.

Closing an airport based on a forecast may be risky, but there are clear benefits to certainty

However, it is clear that early closure can be appropriate and should be part of the toolkit that airports use to respond to major weather events. Early action taken on the reasonable anticipation of severe weather can provide certainty to airlines that they will not be able to operate. Not only can this provide a clear planning window for airlines and ground handlers before operations restart, but it can allow for more effective and better coordinated snow clearance and a clear and consistent message to be communicated to passengers.

Our discussions with industry have highlighted a number of areas of best practice in this regard:

- Airports, airlines and ground handlers should together have a clear understanding of how different disruption events impact on airport operations and under what circumstances airports can continue to operate and at what level.

- This understanding should go beyond airfield infrastructure, and consideration should be given to all aspects of critical airport infrastructure (e.g. terminal capacity) and key services (e.g. Border and Immigration). Indeed, this understanding should go beyond the airport boundary to cover surface access issues – staff availability can, for example, be severely restricted as a result of disruption to other transport modes.

- A clear, early decision on airport closure / re-opening should be made, taking into account the operational impacts on airlines (e.g. crew hours, aircraft position, etc) and the welfare impacts on passengers of a lack of certainty.

Safeguarding resilience

We have heard from a number of airports about the challenges they faced this winter in maintaining operations in situations where they are either recovering from recent disruption or where they were subject to knock-on effects from other disrupted airports. Indeed, operations at airports recovering from disruption last winter proved to be sensitive to a number of unexpected events.

Flight schedules should be jointly-agreed, achievable and should maximise the available capacity

Discussions with airlines and airports revealed the importance of safeguarding resilience, in particular in relation to design and implementation of the reduced flight plan. The coordinated reduction in airline services can support the airport and airline efforts to make best use of the available airport capacity, delivering an updated flight schedule that maximises the benefits to passengers but is also achievable in practice.

These schedules should be properly enforced

However, a number of airlines and airports noted that there were examples of airlines landing or taking-off when they did not have prior agreement to do so (i.e. they

operated 'off slot') and that this unplanned operation could cause disruption to planned operations. A number of airlines also argued that these 'off slot' operations raised issues of fairness and equity amongst airlines.

Airports, working together with their airlines and ground handlers, should establish an agreed policy for handling commercial diverts

A number of airports also noted that, even where an airport was not experiencing significant weather disruption itself, their operations were still subject to knock-on effects from other disrupted airports. In particular, a number of airports saw their (relatively normal) operations disrupted by accepting commercial diverts[8]. In addition to disrupting planned operations at the airport accepting the diversion, it was noted that there were a number of implications for passengers on diverted aircraft. Diverted aircraft generally receive a lower priority service than those operating to their scheduled airport. Consequently, these aircraft are often parked on remote stands, some distance away from the terminal. A number of airports commented that there were also issues with the availability of ground handlers and facilities for passengers on arrival which led to lengthy waits to disembark, collect luggage and travel onward.

Avoiding stranded passengers at airports

During the disruption last winter, it was a major challenge for airlines and airports to ensure that passengers stranded at airports were looked after properly. One important way of improving passenger welfare is to reduce the scale of this challenge in future disruptions by avoiding passengers becoming stranded at airports.

Passengers need the appropriate information and tools to make effective travel decisions

Based on our discussions with industry, consumer groups, and the output from our passenger survey and focus groups, it is clear that, in order to minimise the number of passengers that get stranded at disrupted airports, passengers must be given the appropriate information and tools to make effective travel decisions.

In particular, passengers need to be given the option to stay at home rather than travel to a disrupted airport (e.g. in search of more information) and, if already stranded at a disrupted airport, the option to go home (or to alternative accommodation) rather than remain at the airport. There are two components to enable passengers to make more effective travel decisions:

- Effective **communication with passengers,** so that they have easy access to consistent, timely and accurate information on the status of their flight.

- The **'unblocking' of key enablers** of effective passenger decision-making, for instance the ability to rebook flexibly online.

These issues, and the recommendations for performance improvements, are covered in more detail in the following sections.

Communication with passengers

Information was the primary issue for passengers travelling during the snow disruption – a finding that has been validated in our discussions with industry and with consumer groups, and the results of the passenger survey, as illustrated in Figure 1 below.

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[8] As opposed to aircraft diverted for safety reasons, which clearly must be treated differently.

Figure 1 - 'Word cloud' representation of respondents' answers to the question "What aspects of your journey were you not satisfied with?"

It is clear from our survey and from discussions with industry and with consumer groups that passengers were making significant efforts to get more, and more accurate, information about their flights during the disruption. On average, 73% of respondents to our survey tried to obtain information about the disruption before starting their journey. [9] At those airports suffering the greatest disruption, the proportion of respondents was even higher – around 90% in the case of passengers travelling to/from Heathrow at the height of the disruption. It is also clear from our survey that passengers use a range of sources to get the most accurate information, as illustrated in Figure 2 below.

At the most disrupted airports, around 90% of respondents tried to obtain information about the disruption before travelling

Passengers obtain information from a wide range of sources

Figure 2 – Respondents' answers to the question "Where did you obtain information about the disruption before you started your journey to the departure airport?"

It is clearly beneficial to have a range of communications channels available to passengers so that they have easy access to information along their preferred channels. However, unless the information is consistent, timely and accurate, passengers will not be able to make well-informed travel decisions.

In terms of the quality of information available during the disruption, 74% of survey

It is critical that information is consistent, timely and accurate

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[9] Which compares to around 40% for those airports suffering the least disruption.

respondents stated that they were dissatisfied with the information obtained, with 57% stating that they were very dissatisfied.

Information drawn from our passenger survey, focus groups and discussions with consumer groups, has shown that there were two ways in which passenger decisions can be adversely affected by a lack of consistent, timely and accurate information on the operational status of flights. First, faced with an absence of clear information, some passengers chose to travel to disrupted airports, either because they believed that they would be able to get better information at the airport itself or because the information they had access to was inaccurate (e.g. their flight was shown as operating when in fact it was cancelled). Second, once at the airport, many passengers were reluctant to leave for the same reasons [10].

The following comments taken from the survey reflect the views of passengers:

- "The information board and airport website were both showing that our flight was scheduled when it obviously wasn't. If these had been kept up to date we wouldn't have left home and travelled to the airport".

- "[…] a simple call from the airline saying the flight was cancelled would have stopped me wasting my time going to the airport".

- "Checked for information as travelling to airport, no indication of potential closure of airport when really it was clear when arriving that no flights where going".

- "The flight was obviously cancelled before I ever got to the airport, even before I managed to leave [home], and nobody said anything and waited for us to get there".

- "Could not get through to [airline] phone number provided at the time. Next day queued at [airline] desk in person (as phone not being answered) […]".

- "There was no information available from the airline as the lines were permanently engaged […] so we had to use the courtesy bus to go to the airport each day to see if there was any news of another flight".

- "It's no good telling everyone to go home unless they know they have a flight if the only way they can find out if they have a flight is by coming in person to the airport".

Further, one airport commented that "The success of passenger pre-notification and the availability of airline call centres/websites are directly correlated to the volume of passengers who arrive at [the airport] without a confirmed booking on an operational flight".

'Unblocking' key enablers

Clearly, the provision of consistent, timely and accurate information to passengers on the status of their flight would have allowed passengers to make better informed travel decisions. However, the survey, focus groups and discussions with stakeholders highlight that there are a number of other impediments to effective passenger decision making. 'Unblocking' these enablers is key to ensuring that passengers understand what options are available to them and that they have the confidence to take control of their situation.

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[10] That the timing of the disruption was so close to the Christmas holidays may also have been a factor in passengers' willingness to travel despite the bad weather.

Rebooking over the internet

Some airlines' websites lacked the necessary functionality to enable flexible rebooking

One such key enabler is the ability to rebook flights via airline websites. In our discussions with industry, a number of airlines have acknowledged the limitations of their websites in allowing passengers to rebook flexibly. For instance, a number of airline websites would not allow passengers to cancel and rebook without charge. Rather, passengers had to buy another ticket with the same airline on the expectation that the additional cost would be reimbursed. We learned also that some airline websites would not allow passengers to rebook via other airports, for instance to allow a passenger to travel from Gatwick instead of Heathrow, to take advantage of flight availability at less disrupted airports. A number of respondents to our survey also noted that some airport websites were difficult to use with mobile phones and smart phones.

Some airline website were overwhelmed by demand

In addition to issues of website functionality, a number of airlines admitted that their websites had become overloaded during the disruption.

This is reflected in responses to our passenger survey:

- "The airline's website crashed when we tried to rebook after the 3rd cancelled flight".

- "Rebooked flight was cancelled again and I was not able to rebook on line because website [...] crashed".

- "Website said to call phone number to rebook - unable to reach due to call volume. When call was taken (automated), announcement referred back to online rebook - which was inhibited/unavailable".

- "Unacceptable that website crashes. It should be able to cope with events like this which is when consumers hit websites the most".

Robust, functional airline websites are an important enabler for passenger decision making

For those passengers with access to the internet, robust airline websites with sufficient functionality to allow flexible rebooking would have enabled them to take control of their journey, and potentially reduce the numbers of passengers at airports and the demand for care and assistance. A number of responses to our survey have confirmed this – those passengers that were able to rebook online did not feel the need to travel to disrupted airports and those already at the airport were able to leave, alleviating overcrowding at the airport and reducing the load on other strained airline resources, most notably airline ticket desks and call centres.

Free wi-fi access at airports would facilitate rebooking over the internet

A number of respondents to our survey also suggested that, during periods of significant disruption, airports should remove all restrictions on their wi-fi access points to allow passengers to rebook over the internet. Our discussions with industry have revealed that a number of airports did indeed allow free wi-fi access during the disruption and the CAA considers that this should be incorporated into airports' policies for dealing with the passenger impacts of disruption.

Rebooking over the telephone

Some airline call centres were overwhelmed by demand, with lengthy waiting times in many cases

Access to airline call centres for rebooking is another key enabler for passenger decision making. We know from our discussions with industry that airline call centres were under particular strain during the period – a number of airlines have stated that waiting times for their call centres stretched to many hours at some points.

A substantial number of respondents to our survey have confirmed this:

- "All the reports on the media said contact your airline, that would have been ok if the airline answered the phone".

- "[Airline] phone lines were not in service during the whole period".

- "Their only response was: you have to phone the [airline] helpline for further assistance. I tried for 2 hours to phone them but was constantly on hold".

- "Every day I would phone [airline] and not get through... the phone just rang and rang with no-one answering it".

- "The [airline] number in the UK was so overloaded that they didn't even let callers queue".

Given the significant overcrowding at the most disrupted airports and the long queues for airline ticket desks, rebooking via the airline call centre was the only option for many passengers. A number of respondents to our passenger survey that were able to rebook over the phone indicated that this enabled them to not travel to the airport or, if already at the airport, to return home, alleviating the overcrowding at the airport. As with the issues with airline websites covered above, access to airline call centres is an important tool for enabling passengers to take control of their travel decisions.

The cost of calling airline call centres

Many passengers were unhappy at the cost of calling to rebook flights

Many of the survey respondents that commented on the call centre waiting times commented also on the cost of calling to rebook flights, for example:

- "Mobile phone call to UK [airline] call centre lasted 1 hr 45 mins on hold before they cut me off (before even speaking to anyone) - call cost £40".

- "Very difficult to get through by telephone to [airline]. Premium rate phone line".

- "Took hours and over £80 just in phone call charges to get us rebooked".

- "I spent over £50 trying to call their customer services helpline without getting through".

- "Only able to rebook on premium rate telephone line that kept telling you it was busy and then disconnecting the call. It took 62 calls to rebook flight cancelled twice".

In fact, whilst the cost to passengers of calling airline customer service numbers may have been very high, it appears the charges set by airlines may not be the principal driver of these costs.

Airlines currently offer customer service numbers that attract a wide variety of charges, and the cost to passengers of calling these numbers varies significantly and depends upon:

- The number being called, which ranges from: standard geographic numbers (e.g. with a prefix '01' or '02'); non-geographic numbers (e.g. '0844'/'0845'/'0871'), which might cost around 5 to 10 pence per minute on a BT line; and some premium rate numbers (e.g. with a prefix '09'), with can cost more than 35 pence per minute on a BT line.

- The network used to make the call – in particular, whether a mobile phone is used.

Airlines are likely to receive some revenue from calls to non-geographic numbers and, of course, may receive substantial amounts from premium rate numbers. However, it appears that a significant factor that increases the cost to passengers of calling airlines is the use of mobiles (and potentially non-BT landlines).

Of course, where there is significant disruption, with passengers stranded at airports, it is highly likely that many will only be able to make call on mobiles. In doing so, passengers can inadvertently incur significant additional costs. For example, the

additional cost of calling non-geographic 08 numbers from mobiles and non-BT landlines can be in the order of an additional 5 to 35 pence per minute and substantially more for 09 numbers. However, this additional cost accrues to the network provider (i.e. the mobile company, Virgin Media, etc), rather than to the airlines.

Airlines and airports should make available phone numbers that can be called from most mobiles without significant extra costs

It is unclear to what degree the cost of calling airline customer services' numbers inhibited passengers from rebooking over the phone. However, it is clear that many passengers are unhappy at having to face a sometimes significant and unexpected cost which – in all practical sense – it was not possible to avoid. These costs are, of course, increased where there are extended waiting times to get through to customer service agents. Indeed, a number of passengers complained that charging to rebook was inconsistent with the legal obligation on airlines to provide free phone calls in such situations.

Ofcom – the telecoms regulator – is currently reviewing the provision of non-geographic and premium-rate numbers, including the charges levied by telecoms providers to connect to these numbers. However, in advance of these reforms, airlines and airports should make available phone number that can be called from most mobiles without significant extra costs. In addition, calls to geographic numbers ('01', '02', and '03') typically incur standard charges and are often included within mobile phone 'bundles'. The CAA expects airlines to refund the cost of calls made by disrupted passengers to customer services numbers, in line with their DBC obligations.

Airline policies on rebooking

Airline policies on rebooking may not be clear to passengers and thus may distort behaviour

A lack of clarity over airline policies and procedures for rebooking inhibited the ability of many passengers to make effective travel decisions. One such policy is in relation to prioritisation, in particular for standby seats. Many respondents to our survey indicated that they had been put on standby lists by their airline. For instance:

- "We were told to come back the next day and try for the standby list".

- "Then, after booking us on a flight for four days later, they denied us boarding on that flight and forced us to fly standby on seven other flights".

- "Being booked on standby twice and not getting a seat".

- "How [airline] prioritised their flights following the cancellations and not honouring the flights, but simply cancelling the flights and putting highest paying passengers on standby list although 300+ people were trying to get on standby".

Through our discussions with industry, we have learned that there were very few seats available for standby – Christmas is the busiest time of the year for many airlines. In addition, few airlines have confirmed to us that they had any procedures in place for prioritising passengers stranded at airports during the disruption. Based on our discussions with airlines, it appears that rebooking was mostly done on a first-come-first-served basis. Thus, any available seats would have been more likely to be reserved by those passengers able to rebook online or via call centres rather than those waiting at the airport.

Airlines should clarify their policies for prioritising access to available seats, reducing the numbers of passengers waiting at airports

Given this, airlines should clarify their policies for prioritising access to available seats in a major disruption. For many airline business models, this should support the objective of reducing the number of passengers stranded at disrupted airports, albeit that for some passengers – such as those who have booked a package – it may be appropriate for passengers to travel to the airport to support re-routing.

Airline obligations to re-route

Another area of confusion for passengers was in relation to airlines' obligations to re-route them when their flights were cancelled, particularly those passengers not travelling as part of a package.

The CAA is aware that a number of airlines have adopted different policies in relation to rerouting, and this is evident in a number of survey responses:

- "Flight being delayed, delayed again then finally cancelled, no re-route offered".

- "Each time I asked to be re-routed and was refused, the reason given that [airline] does not re-route".

Greater clarity over airlines' obligations to re-route passengers will enable passengers to make more effective travel decisions

Airlines are required by UK and European law to offer to re-route passengers via comparable transport at the earliest opportunity. This obligation is not limited to just offering flights nor is it limited to just offering flights with that airline. Instead, airlines should take reasonable steps to offer alternative routings that include flights operated by other airlines as well as transport via other modes (e.g. rail). Airlines should ensure that they have the necessary processes and procedures in place to facilitate rebooking via other airlines and modes of transport.

Further, airlines should make clear to passengers that, where airlines are unable to handle the number of disrupted passengers, they are permitted to make their own re-routing arrangements. This should increase the likelihood that passengers' legal rights to re-routing are delivered. The lack of a consistent (and widely understood) approach to re-routing by airlines restricted some passengers' ability to understand the range of travel options available and thus make informed travel decisions.

Self-assistance rebooking

A further area of confusion for passengers during the disruption was whether they should rebook their flights themselves. It is clear from the considerable strain placed on airline ticket desks and call centres during the disruption that many passengers preferred to speak to a member of airline staff in order to rebook. This is understandable, as it offers a certain amount of protection that the rebooking will go smoothly and that the passenger will not incur any extra costs. However, based on responses to our survey, it appears that many passengers chose instead to rebook flights themselves on the basis, implied or otherwise, that any extra expense would be refunded.

However, our survey also indicated that, although some airlines seemed to be encouraging passengers to rebook themselves, not all airlines were making clear the limitations on what they would be prepared to reimburse in such cases:

- "After much searching, I found two alternative flights at my own expense, to my final destination. [Airline] have refused to compensate me for both flights, as they say they are not a connecting airline".

- "We therefore found an alternative carrier [...] departing on Monday [...]. [Airline] refuse to pay any of the additional costs".

- "Incurred almost £150 additional expense getting home by train which the airline have refused to compensate me for".

- "[Airline] staff, [...] said we would be compensated if we flew home with another airline 36 hours later. We bought tickets with [other airline] for EUR300 to fly home to Stansted only for [airline] to refuse to honour the promise made by their staff".

- "[…] had to make our own way there at our cost flew to Gatwick then Edinburgh

then taxi to Glasgow all at our expense [airline] refusing to reimburse us".

Airlines should clarify their policies on self-assistance to encourage passengers to take control of their travel decisions

Given the significant strain on airline resources during the disruption, especially ticket desks and call centres, self-assistance rebooking should have been an effective option for airlines to give passengers control of their journeys and relieve the strain on airlines resources, whilst also delivering a practical way for passengers to receive the re-routings that the law entitles them to. However, it is clear that there are a number of shortcomings in relation to airlines' policies on the use of self-assistance. These policies need to be made more consistent and communicated to passengers in order to give them the confidence that any reasonable additional costs they incur will be reimbursed.

Access to passenger rights

Our discussions with consumer groups raised the issue of passenger rights and at what point in the journey these applied. Our discussions revealed that passengers were not getting a consistent message during the disruption that they did not have to check-in to get access to their rights to a refund/rebooking or to make an insurance claim. A number of responses to our survey bear this point out:

- "After Heathrow broadcast a message telling passengers not to travel, we phoned [airline] who advised us that they would not give us a refund or rebook our tickets unless we travelled to the airport. In effect they added to the over-crowding and chaos by forcing us to travel to a closed airport".

- "[Airline] said that as none of the passengers had checked in for the […] flight, we were not their responsibility and therefore we had to arrange our own transport, food, hotels etc".

- "The insurance company [named] have refused to pay out given we did not check in on the 18th. We were not allowed to check in […] but we were still delayed".

Passengers do not have to check-in in order to access their rights. This should be made clearer

It is the view of the CAA that passengers did not have to check-in in order to access their rights to a refund/rebooking. Further, given the fact that many airports were closed for prolonged periods during the disruption, it was not practical to require passengers to physically check-in in order to support an insurance claim. Clarity over this issue should help reduce the risk in future that passengers travel to disrupted airports unnecessarily.

Making claims in the event of disruption

Another issue relating to travel insurance is the proof required to make a claim. A number of respondents to our survey have been asked by their insurer to provide documentation that their flight was cancelled in order to make a claim. However, this information can be extremely difficult to find:

- "[Airline] have still not replied to numerous emails and letters I have sent acknowledging the fact they bumped me from this flight. Without this my insurance company are refusing to pay-out".

- "Over one month later, it has, so far, proved impossible to get written confirmation that my [flight] was cancelled by them. I need this confirmation to claim from my travel insurance".

- [Arline] has been unable to confirm in writing that they were unable to fly me to my destination for 72 hours […], which means the insurance company will not reimburse me for my abortive costs".

- "I am unable to claim on my insurance have lost a great deal of money due to the fact that no-one other than [ground handler] will state the flight was cancelled

> and then reinstated".

- [Airport] unhelpful in providing information regarding closures after the time, when I needed this for travel insurance claim".

Better information is needed to support passengers' insurance claims.

The available evidence suggests that a lack of information on cancellations and delays has inhibited passengers from making legitimate claims and could, potentially, have acted as another factor causing passengers to travel to disrupted airports. One possible solution to this problem would be for airports and/or airlines to provide historical information on cancellations and extended delays.

Caring for passengers

As is shown later in this section, airlines' performance was highly variable in terms of looking after stranded passengers during the disruption this winter. Improving performance in terms of maintaining operations and avoiding stranded passengers should reduce the strain on airline resources significantly, allowing them to target their efforts to where it is most needed. However, based on responses to our survey, feedback from focus groups and discussions with the industry and consumer groups, it is clear that the capability of the airline sector to care for a large number of passengers also needs to be improved in a number of key areas. These are covered below.

Informing passengers of their rights

75% of survey respondents were not informed of their rights

Our passenger survey included a number of questions to determine how well airlines performed in looking after their passengers. The first question was in relation to passenger rights. Under European law, airlines are required to inform passengers fully of their rights so that they can exercise them effectively. In response to a survey question asking respondents whether they were informed of their rights, 75% said that they were not informed of their rights when their flight was cancelled / delayed.

Clearly, with airline resources so overloaded, it is not realistic to expect that every passenger could be informed individually of their rights by a member of airline staff. However, the fact that only 25% of respondents were informed of their rights indicates an unacceptably low level of performance.

The provision of leaflets and posters at the airport, setting out clearly the rights of passengers, would be an effective way of informing passengers of their rights

It is revealing that, of the 25% that were informed of their rights, only 33% (i.e. 8% of the total) were given a leaflet setting out their rights. In order to allow passengers to exercise their rights fully, they must be informed of them in an understandable way and at the appropriate time (ideally, at the time their flight is cancelled / delayed). The CAA considers that more information should be made available to passengers on their rights and how airline will meet their legal obligations in practice in relation to these rights.

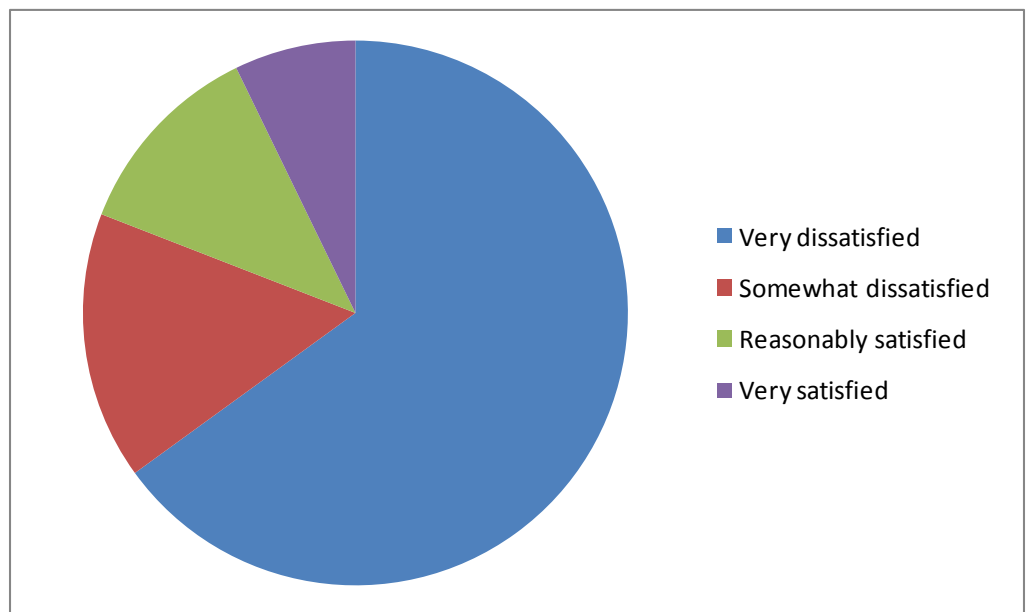### Provision of care and assistance

Our survey also included questions on the type of assistance passengers received from the airline as well as how satisfied they were with the assistance. Figure 3 below shows that, of the 744 passengers that answered this question, 448 (60%) stated that they did not receive any assistance from the airline. Unsurprisingly, as shown in Figure 4, 81% of respondents to our survey stated that they were dissatisfied with the assistance they received; with 65% stating that they were very dissatisfied.

60% of survey respondents did not receive assistance from their airline
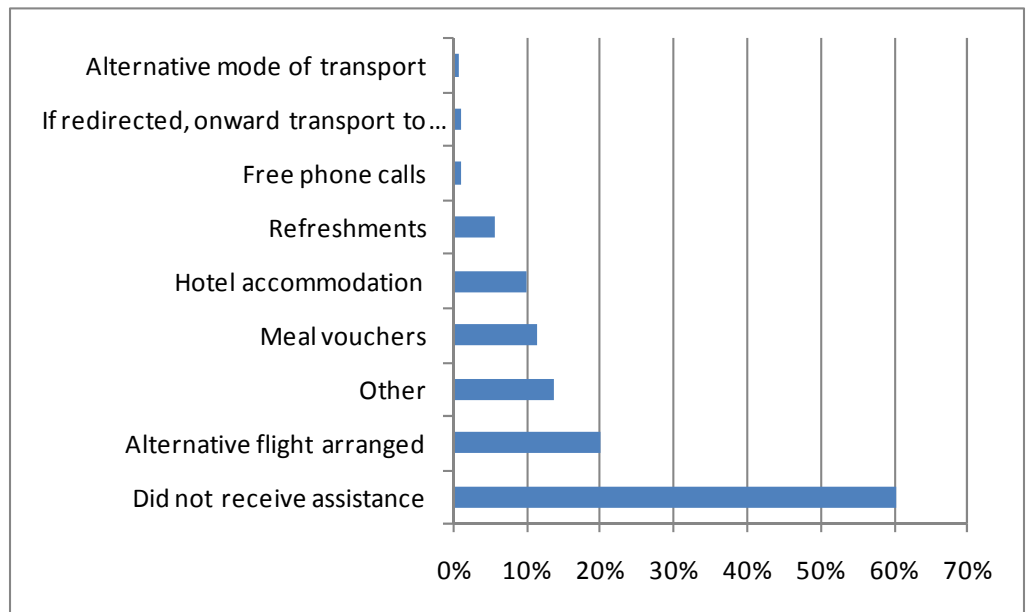
Figure 3 – Respondents' answers to the question "What type of assistance did you receive from the airline?"

65% of survey respondents were very dissatisfied with the assistance they received from their airline

Figure 4 – Respondents' answers to the question "How satisfied were you with the assistance you received from the airline?"

Airlines should have the necessary arrangements in place to meet their legal obligations to provide care and assistance, especially food, refreshments and hotel accommodation

As with the issue above on provision of information on rights, with airline resources so overloaded during the disruption, it is not realistic to expect that every passenger could be assisted individually by a member of airline staff. However, handing out vouchers for food and refreshments and even hotel accommodation does not need not be a particularly resource intensive exercise if the airline has made contingency arrangements to deal with such circumstances.

A number of examples from our survey illustrate that some airlines may be particularly under-prepared for such circumstances:

- "There were no meal vouchers handed out, no hotel vouchers handed out, no [airline] staff at all to be found anywhere".

- "[Airline] did not have a representative on site, they were supposedly represented by [handling agent] but they kept saying they had no authority from [airline] to

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provide drinks/meals vouchers, or arrange hotel accommodation etc".

- "No meal vouchers, no phone calls offered, little information and no sense of urgency".

- "The fact that despite specifically asking, the [airline] staff steadfastly refused to offer any assistance (hotel, meals or otherwise) when faced with an overnight delay due to the flight being cancelled".

- "Asked about food and accommodation as I was rebooked onto next day's flight (which was also cancelled) and told I was not entitled to any help as it was weather related".

- "Long queues to speak to an employee of [airline] and given a leaflet disclaiming any responsibility for accommodation. No food vouchers either. We were just left to our own devices".

- "At 8 pm ground personnel closed booking for the night and told passengers they were "on their own". No food vouchers, no hotels for the night, no help".

- "In fact, we were explicitly told that the airline had no responsibility for us and would not provide any food or accommodation".

According to our survey, only around 10% of survey respondents received vouchers for food or accommodation – this is unreasonably low, even taking into account the unusual circumstances.

Self-assistance

Airlines should clarify the extent to which they expect passengers to self-assist and what constitutes "reasonable expenses"

In common with the findings on self-assistance, based on responses to our survey, it appears that many passengers chose to purchase food and drink and also hotel accommodation themselves on the basis, implied or otherwise, that any extra expense would be refunded.

The survey also suggests that, although some airlines seemed to be encouraging passengers to pay for food and hotels themselves, not all airlines appear to be making such reimbursements in all cases:

- "[Airline] staff did not provide us with any support at the airport […], they offered absolutely zero assistance in arranging overnight accommodation (two nights!), and did not explain that the expenses should be reimbursed by the airline".

- "[Airline] now denying my claim for a refund of sums spent on hotel accommodation / phone calls / meals etc by claiming that it is 'compensation' and that compensation is not applicable due to it being a severe weather event".

- "[Airline] have refused to pay for any hotel or meal costs we incurred for the extra four days we were forced to remain in the UK".

As with self-assistance rebooking, given the significant strains on airline resources during the disruption, it would seem sensible for airlines to encourage passengers to provide for themselves in terms of food and water and hotel accommodation, where passengers are able to do so. This reliance on self-assistance is likely to relieve the strain on airline staff and allow them to better target their assistance to those most in need of help. Unfortunately, European legislation on denied boarding does not cover what passengers are entitled to in these circumstances. In addition, based on responses to our survey, it is not clear to many passengers what they are entitled to and to what extent they will be reimbursed for any additional expense.

Given the potential for self-assistance to reduce the burden on airline resources, airlines should clarify the extent to which they want to encourage this practice, as a way of meeting the intent of European law. In particular airlines should clarify when

self-assistance should be utilised and details of what constitutes "reasonable expenses". In addition, airlines wishing to take advantage of self-assistance should make a strong commitment to passengers to reimburse them any reasonable expenses.

Complaint handling

According to our passenger survey, 65% of respondents indicated that they had made a complaint, with 90% of respondents making a complaint to their airline. Figure 5 below shows what recompense, if any, complainants have received.
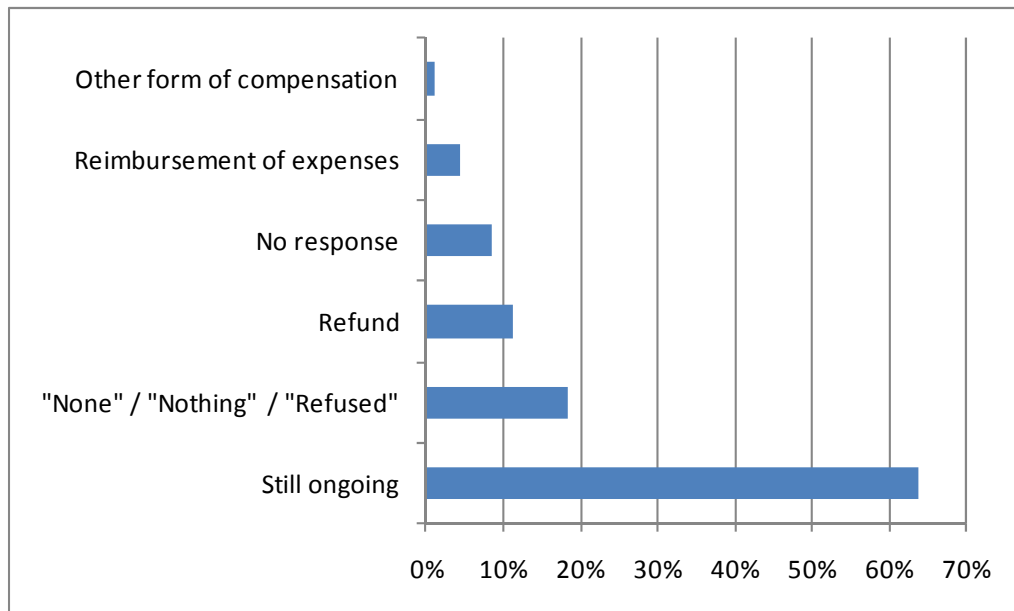
Figure 5 – Respondents' answers to the question "What recompense, if any, have you received in response to your complaint"

It can be seen from the chart above that a substantial proportion of the respondents to our survey had not received any recompense or had their claim refused (a greater proportion than those that have received a refund or compensation). Without knowing the detail of each complaint, it is difficult to assess the validity of each claim. However, an analysis of responses to the survey indicates that many claims are for reimbursement of expenses incurred by passengers in rebooking their own flights or for food or hotel accommodation. Given that it is the responsibility of airlines to provide this assistance in the first place, airlines should ensure that they have sufficient resources to ensure that claims for expenses can be processed quickly.

Airlines should improve their performance in terms of complaint handling

However, what is most striking in the chart above is that such a large proportion of respondents indicated that they have not received a response from the airline or that their claims are still ongoing. Even for those responses received in March this year, months after the event, over 50% of respondents' complaints were still ongoing. Performance in this area should be improved if passengers are to feel confident that they will be reimbursed quickly for any reasonable expenses they incur in self-assisting.

However, based on information drawn from discussions with consumer groups and from passengers directly via our online survey and focus groups, it is clear that there is considerable room for improvement across the sector:

- In terms of the quality of information available during the disruption, 74% of survey respondents stated that they were dissatisfied with the information they received, with 57% stating that they were very dissatisfied.

- In response to a survey question asking respondents whether they were informed of their rights, 75% said that they were not informed of their rights when their flight was cancelled / delayed.

- In terms of care and assistance, 60% of survey respondents stated that they did not receive any assistance from their airline. 81% of respondents to our survey stated that they were dissatisfied with the assistance they received; with 65% stating that they were very dissatisfied.

Clearly, given that the survey sample is drawn from passengers experiencing the greatest disruption during the period, there is the potential issue of sample bias and it is perhaps to be expected that these passengers will be particularly critical of their experiences. For this reason, we have taken a very careful approach to interpreting the survey data and we do not claim that the responses to our survey are representative of, for instance, all passengers travelling with a particular airline or from a particular airport.

Rather, we have used the information drawn from the survey and from the focus groups to identify the most pressing, priority issues for passengers during periods of disruption across all airports and airlines. In addition to taking a careful approach to interpreting the survey data, we were able to validate the conclusions drawn from this information with a wide cross-section of industry at a roundtable meeting on 17 March 2011.

Way Forward

Areas for improvement

As discussed above, we have identified three areas where performance should be improved. The objective of the improvements is first to reduce the number of passengers affected by any major disruption, and then to improve the care given to those passenger that remain stranded at the airport:

- Improved coordination and communication between airports, airlines and ground handlers will help airports **maintain operations** and reduce the number of passengers affected by major disruption.

- Where operations are impacted, helping passengers to make well-informed travel decisions, for instance through providing better information on operations at an earlier stage, will help **avoid stranding passengers** at the airport.

- For those passengers ultimately stranded at the airport, ensuring that airlines **care for passengers** in line with their legal obligations should reduce the degree of discomfort and distress these passengers experience.

Annex C sets out a set of possible solutions which we consider could be implemented by airports and airlines in order to achieve the outcomes described above. However, we recognise that implementation will work best if it is undertaken by stakeholders themselves, working collaboratively, rather than as a result of regulatory intervention.

For this reason, we have undertaken extensive consultation with the industry to determine how best to achieve improvements in performance, building on the expert knowledge and best practice that already exists in the industry and avoiding the risks of a one-size-fits-all approach. This period of consultation has now concluded.

Next steps

The Major Disruption Policy Development Group will identify and share best practice

We have agreed with the Airport Operators Association (AOA) and the British Air Transport Association (BATA) that they will establish a Major Disruption Policy Development Group, which will be an industry-led group to facilitate performance improvements in the three areas identified by the CAA, and which will be responsible for identifying and sharing best practice and examples of 'best in class' performance for dealing with major disruption. The full terms of reference of this group can be found in Annex D.

The CAA will conduct an 'assurance' process in October to determine how well the industry is placed to deal with future disruption events

The CAA will remain the principal body responsible for monitoring and ensuring compliance with the relevant legislation and policy. We will conduct a process of review during October 2011 to identify the performance improvements made, and those planned to be made, by airports and airlines and to determine how well the industry is placed to deal with future events that can lead to major disruption (e.g. snow).

Thank you

Finally, we would like to thank all of the passengers, consumer groups, airlines, airports and ground handling companies that helped the CAA in this review.

Annex A – CAA snow survey

Background to the passenger survey

On 31 January, the CAA launched a two-month online survey to gather information from the travelling public

On 31 January 2011, the CAA launched a two-month online survey to gather information from the travelling public about their experiences during the disruption to flying caused by snow in November and December 2010.

The objective of the survey was to help the CAA gain a better understanding of passengers' views about how airports, airlines and other companies operating at UK airports, met, or failed to meet, their expectations. The CAA was particularly interested in finding out how well passengers were kept informed about the disruption and whether people were told about their rights to assistance from airlines.

The survey was completed by 1,000 people

The CAA's survey was completed by over 1,000 people.[11] In terms of the types of passengers that responded to the survey, as is explained further below, the majority of the responses to the survey were from passengers travelling to / from the most disrupted airports at the time that these airports were most severely disrupted. Therefore, the experiences of these passengers cannot be taken as representative of the experience of travelling by air in general, or even when there is moderate disruption[12].

Sample is drawn from the most disrupted passengers during the period. Potential issue of sample bias means results should be interpreted carefully

A further issue that has been raised is in relation to sample bias – i.e. only those passengers that had particularly bad experiences will be motivated to respond to surveys such as this one. We agree that sample bias could be an issue with our survey. So that we do not misinterpret the information that we have collected, we have been careful not to interpret individual responses to our survey as being representative of, for instance, all passengers travelling with a particular airline. Rather, we have used the information drawn from the survey to identify the most pressing, priority issues for passengers during the snow disruption across all airports and airlines. In addition to taking a careful approach to interpreting the survey data, we were able to validate the conclusions drawn from this information with a wide cross-section of industry at a roundtable meeting on 17 March 2011.

Characteristics of survey respondents

Almost 90% of respondents were travelling during the most disrupted period

As described above, the vast majority of respondents to the survey had planned to travel around the two periods of most significant disruption (89% of respondents planned to travel either late November / early December or the period following 17 December up to Christmas).
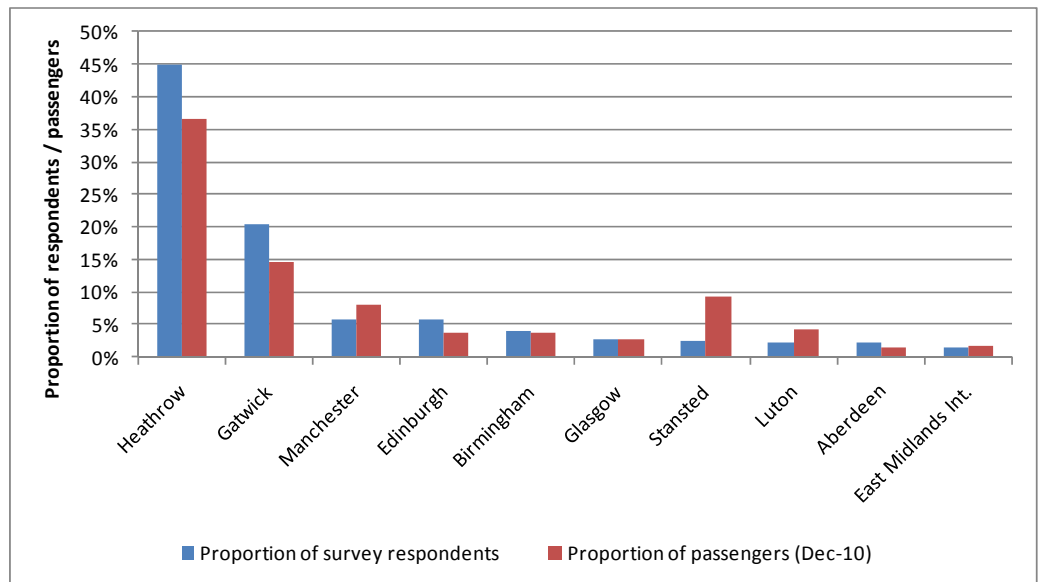
In addition, as can be seen from Figure 6 below, we received a greater proportion of responses from passengers travelling from the most disrupted airports (i.e. Heathrow, Gatwick and Edinburgh) than would be expected based on the proportion of passengers usually travelling from these airports at that time of year.

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[11] In order to encourage participants to complete the survey, most of the questions were made to be non-compulsory. Therefore, not every respondent has answered every question which has the effect of lowering the sample size for each answer to around 700.
[12] Airports such as Heathrow and Gatwick typically experience around 50 days per year of moderate disruption, which will include delays to flights and some cancellations.

A greater proportion of passengers were travelling from the most disrupted airports

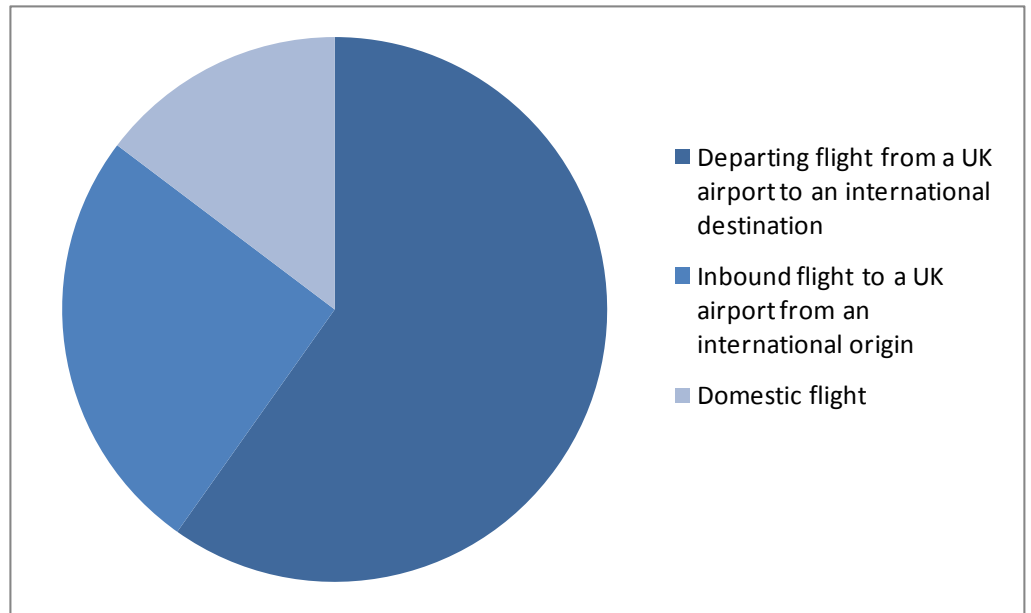**Figure 6 - Breakdown of survey respondents by airport (top 10 airports by passengers)**

Similarly, as shown in Figure 7 below, we received a greater proportion of responses from passengers travelling on airlines with their main operations at the most disrupted airports than would be expected based on the proportion of passengers usually travelling with these airlines.

Similarly, a greater proportion of passengers were travelling with airlines based at the most disrupted airports
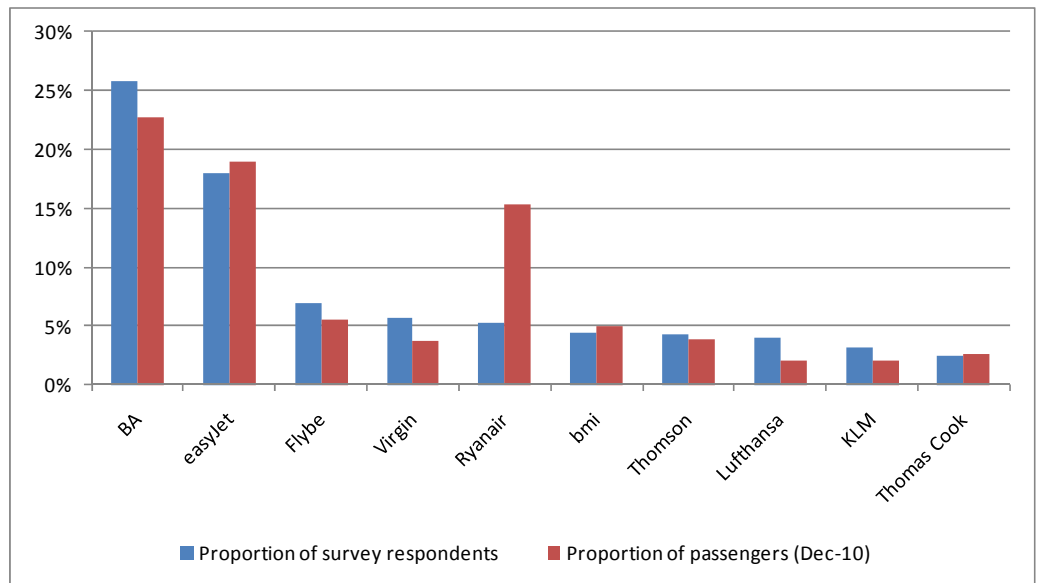
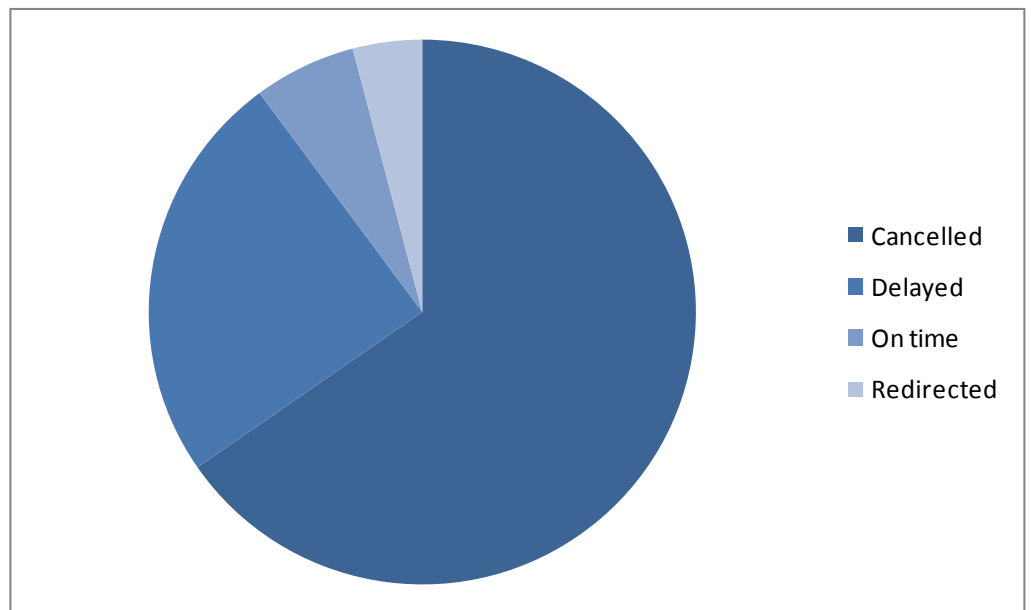**Figure 7 - Breakdown of survey respondents by airline (top 10 airlines by passengers)**

Figure 8 - Proportion of survey respondents by flight type

As can be seen in Figure 8 above, 60% of survey respondents were departing from a UK airport to an international destination, 25% flying inbound to a UK airport from an international origin, and 15% travelling on a domestic flight.

Figure 9 - Proportion of survey respondents by disruption event

As can be seen in Figure 9 above, over 65% of survey respondents had their flights cancelled, with a further 24% being delayed and 4% redirected. Only 6% of respondents reported that their flight left on time. Of those respondents who had their flight cancelled, 24% were able to travel the following day, 21% had to wait two days before they could travel and 17% had to wait three days. 38% of survey respondents reported that they had to wait four days or more before they could travel. Of those survey respondents who were delayed, 42% were delayed less than 6 hours, 23% were delayed between 6 and 24 hours and 26% more than 24 hours. The average delay experienced by these passengers was just above 4 hours.

Annex B – Written and verbal submissions to CAA review

Airlines	Airports	Other stakeholders

• Aer Lingus
• Air France
• Alitalia
• American Airlines
• bmi
• British Airways
• easyJet
• Flybe
• Loganair
• Monarch
• TAP
• Thomas Cook
• TUI
• United
• Virgin
	• Aberdeen airport
	• Birmingham airport
	• Edinburgh airport
	• Gatwick airport
	• Glasgow airport
	• Heathrow airport
	• Luton airport
	• Manchester airport
	• Southampton airport
		• Service providers
		  • OCS
		  • Menzies
		  • Servisair
		• Trade bodies
		  • ABTA
		  • AOA
		  • BARUK
		  • ELFAA
		• Consumer groups
		  • AUC
		  • CCNI
		  • Guide Dogs
		  • Leonard Cheshire
		  • Which?

Annex C – Potential solutions to improve performance

Introduction

As stated previously, we have developed a set of possible solutions (below) which we consider could be implemented by airports and airlines in order to achieve improvements in performance. However, we recognise that implementation will work best if it is undertaken by stakeholders themselves, working collaboratively, rather than as a result of direction from the CAA.

We have therefore agreed with the Airport Operators Association (AOA) and the British Air Transport Association (BATA) that they will establish a Major Disruption Policy Development Group, which will be an industry-led group to facilitate performance improvements in the three areas identified by the CAA.

We are therefore not asking industry to implement the solutions described below at this time. Whilst we consider that these solutions would be one way of improving performance – and individual airports and airlines may choose to implement some or all of these solutions themselves – we would prefer solutions to be designed and implemented by those best placed to identify what will work in practice. Consequently, we are asking industry to consider the CAA's ideas alongside its own solutions, through the Major Disruption Policy Development Group. The CAA will then conduct a process of review during October 2011 to determine how well the industry is placed to deal with future events that could lead to major disruption.

Maintaining operations

Airports should develop a Major Disruption Plan to define how each stakeholder contributes to maintain operations

We consider that a mechanism is needed to set out mutual expectations clearly, on the part of airports, airlines, ground handlers and other airport stakeholders, regarding the action each party will take – jointly and independently – to maintain operations in response to events likely to cause significant disruption including, but not limited to, adverse weather. We refer to such a mechanism as a **Major Disruption Plan.**

Plan will enable effective information sharing between airport stakeholders and facilitate joint decision making

Such a Plan clearly cannot be written unilaterally by one player. Instead, it needs to be developed, published and implemented collaboratively by airports, airlines, ground handlers and other relevant stakeholders. However, we consider it likely that this work will be done best with airports taking a lead, since we anticipate that the details of each Major Disruption Plan will be individual to each airport, depending on the business model of the airport and of its customers.

However, we envisage that all Major Disruption Plans would cover the following:

- The roles and responsibilities of each of the relevant airport stakeholders in dealing with major disruption, in particular in relation to snow clearance.

- The capabilities and contingencies required on the part each of the relevant stakeholders in order for the Major Disruption Plans to be implemented fully.

- The processes and procedures for the effective sharing of operational information between all relevant stakeholders.

- The processes and procedures for the governing command and control structures, with particular regard to the timing of when these structures should be initiated and stood-down, and how they can be best constituted and operated so as to facilitate joint decision making.

- Consideration of how decisions on the timing of airport closure and re-opening

will be made, including how the following issues will be taken into account:

- The capability of all critical infrastructure (e.g. terminal capacity and the public highway system) and key services (e.g. Border and Immigration) at the airport to maintain operations.

- The balance between the costs and benefits to airlines and passengers of greater certainty about whether and how long the airport will be closed.

- The capability of airlines, ground handlers and airports to care for stranded passengers.

Plan should include agreed processes and procedures for slot allocation in periods of reduced capacity

We would expect also that all Major Disruption Plans will include the processes and procedures for determining which airlines will be allocated slots in the event that the airport has to operate under reduced capacity. We expect that this will include the relevant roles and responsibilities of the airport, the AOC, individual airlines, and, where relevant, ACL. We consider that it would be beneficial for these processes and procedures to take account of the benefits to passengers of different options for slot allocation. Further, we consider that it would be beneficial for these processes and procedures to include an effective sanctions regime, to ensure that airlines comply with any reduced capacity schedule.

Plan should include agreed policy on accepting diversions

In addition, we expect that all Major Disruption Plans will include the processes and procedures for determining when diverted aircraft, other than those diverted for safety reasons, can land at airports during periods of disruption without adversely impacting airport operations.

May be merit in agreeing a process for claiming compensation where parties fail to meet obligations under the Plan

Further, airport stakeholders may also wish to include in their Major Disruption Plan a process to enable any party to seek appropriate redress as a result of the failure of any other party to meet its obligations under the plan. It is the view of the CAA that any such process must be two-way, to enable, for example, airlines to claim for compensation if the airport has failed to meet its obligations under plan, but also to enable airports to claim for compensation from airlines that have not met their obligations (in particular in relation to caring for passengers in accordance with their legal obligations, where this has led to a need for the airport to step in to provide passengers with assistance).

Finally, we would expect that all Major Disruption Plans will be reviewed jointly by each party to the plan once each year. We consider that it would be beneficial for each review to include table-top exercises, simulations and any other relevant testing activities for assessing the feasibility of the plan.

We will, therefore, be looking for each major UK airport to either have a Major Disruption Plan, or to have adopted an alternative approach which meets the objective of establishing clarity about mutual expectations, roles and responsibilities when seeking to maintain operations at an appropriate level.

Avoiding stranding passengers

We consider that work is required to improve communication with passengers during periods of disruption. Specifically, airlines need to consider (in association with other stakeholders) how they can communicate with passengers (with particular regard to disabled passengers and passengers with specific communication needs) during periods of disruption in order to ensure that passengers receive consistent, accurate and timely information on the status of their flight.

Airlines should develop a Passenger Communication Plan

We suggest that airlines' plans for communicating with their passengers should be discussed with airports, ground handlers and other relevant stakeholders, and recorded in what we are referring to as a **Passenger Communication Plan**.

Plan should establish roles and responsibilities in terms of communication with passengers directly and via the mass media

Clearly, airports have a role to play in communicating with passengers. Consequently, we would stress the need for airlines to co-operate with airports in developing a Passenger Communication Plan, and we would expect that the plans would have tailored variants specific to each airport. Nevertheless, the primary obligation to communicate with passengers lies with airlines, and we see airlines taking a lead in developing these plans.

The detail of each Passenger Communication Plan will be individual to each airline and airport, depending on the business models and the communications capability of each stakeholder. However, we would expect all Passenger Communication Plans to cover the following:

- The roles and responsibilities of each of the relevant airport stakeholders in communicating with passengers.

- The processes and procedures for coordinating updates to passengers across all stakeholders and all information channels

- An agreed strategy for communicating with the mass media, e.g. TV and radio.

Airlines should establish, and move towards, best practice / best in class performance in terms of communicating with their passengers and allowing their passengers to make alternative travel decisions

In addition to developing a Passenger Communication Plan, we suggest that all major airlines flying in and out of the UK should:

- assess their current levels of performance and capability in terms of a) communicating with their passengers and b) allowing their passengers to make alternative travel decisions.

- identify best practice / best in class performance in each of these areas (noting that different approaches may be needed for different airline business models).

- review their progress in terms of achieving best practice / best in class performance.

We consider that the relevant 'performance and capabilities' should include:

- The speed with which operational data on cancellations / delay can be communicated to passenger facing staff and passengers directly, including at airports.

- The proportion of passengers that can be updated via SMS (text message).

- Call centre waiting times (and costs) during periods of disruption.

- Website resilience during periods of disruption.

- Use of alternative communications channels, e.g. social media.

- Website functionality to enable flexible cancellation and rebooking, including via other airports.

- The availability of historical data on cancellations and delays during periods of major disruption.

- The availability (and cost) of internet access (i.e. via wi-fi) at airports during disruption

We will, therefore, be looking for each major airline operating in the UK either to have developed a Passenger Communication Plan (taking into account the assessment of best practice discussed above), or to have adopted an alternative approach which meets the objective of improving the consistency, accuracy and timeliness of information provided to passengers.

Caring for passengers

Airlines should carry out a Welfare Capability Assessment

It is clear that a number of airlines need to prepare better in order to meet their legal obligations during periods of major disruption. The best way to organise the provision of support to passengers will vary between airlines, and between airports.

We are therefore looking for all major airlines flying in and out of the UK to have carried out a **Welfare Capability Assessment** of their ability to care for passengers in accordance with those legal obligations. We consider that such an assessment should include:

- An estimate of the number of passengers at each airport that the airline would expect might qualify for rights to care during major disruption.

- The resources and contingencies available to the airline to care for these passengers, including:

  - Availability of airline staff, ground handling staff or other third-party staff available under contract (e.g. airport staff).

  - Availability of vouchers for refreshments and hotels.

  - Any other contingency arrangements.

- An assessment of how effective the available resources are in meeting the needs of passengers during periods of disruption, in particular passengers with special requirements (e.g. passengers with reduced mobility) or vulnerable passengers.

- Where an airline chooses to meet its legal obligations to care for passengers through, for instance, agreements with third-parties (e.g. ground handlers or airports) or passenger self-assistance, the efficacy of these arrangements in meeting its obligations.

- The capability of the airline to process claims for reimbursement of expenses, in particular the process that will be followed by the airline and an indication of how long passengers can expect to wait for reimbursement.

CAA ready to work with airlines to help remedy capability shortfalls and to clarify legislation / policy where needed

Where an airline has determined that the resources and contingencies available to it are insufficient for it to meet its legal obligations to care for passengers in the event of major disruption, or where an airline considers that there is ambiguity in the relevant legislation / policy that is impeding it in implementing effective arrangements to care for its passengers, the CAA will work with that airline to resolve these issues.

Airlines should develop a Passenger Welfare Plan

Following on from the Welfare Capability Assessment, we will be looking for each airline either to have developed, published and implemented a **Passenger Welfare Plan**, detailing how it will meet its obligations to care for passengers during major disruption and what it expects from passengers in cases where they choose to self assist, or to have adopted an alternative approach that ensures that airlines are better placed to meet their legal obligations in respect of assisting passengers following cancellations and long delays.

May be merit in airlines developing a Statement of Rights and Policies

We also consider that there may be merit in airlines developing a **Statement of Rights and Policies**, which would set out passenger rights and key airline policies where rights are not clear and unambiguous. This statement could be distributed to passengers at airports during periods of mass disruption. We consider that a Statement of Rights and Policies could include, in particular:

- A clear, easy to understand statement on what passengers rights are if their flight is cancelled or delayed.

- Airline policies in relation to how they will meet these rights, in particular:

  - Airline policies on rebooking, including:

    - How stand-by seats are allocated and the prioritisation (if any) of rebooking passengers that are present at the airport.

    - Rebooking via another airline or other mode of transport.

  - Airline policy on self-assistance, including:

    - Self-assistance rebooking, in particular the conditions under which passengers can rebook via another airline or other mode of transport and what expenses they can expect to have reimbursed.

    - Self-assistance welfare provision, in particular the conditions under which passengers can pay for their own food and accommodation and what expenses they can expect to have reimbursed.

    - The process for reimbursement of expenses, including what proof-of-purchase passengers will be expected to provide

Airports should also carry out a Welfare Capability Assessment and develop a Passenger Welfare Plan

Our review has also highlighted that airports are not necessarily well placed to play their role in caring for passengers. We therefore suggest that that all major UK airports – in collaboration with airlines, ground handlers and other relevant stakeholders – should have a developed a **Welfare Capability Assessment** and will have put in place a **Passenger Welfare Plan**, detailing how they will meet their obligations to care for passengers during major disruption. In the case of airports, we expect this might cover:

- The resources and contingencies available to the airport to care for passengers with reduced mobility during periods of major disruption.

- The resources and contingencies available to the airport to provide 'emergency' care for passengers that choose to – or have no option but to – remain at the airport for prolonged periods.

We consider that there may be merit in airports also developing a Statement of Rights and Policies, which would set out passenger rights and key airport policies where rights are not clear and unambiguous.

Annex D – Major Disruption Policy Development Group – Terms of Reference

Recognising:

- that the prolonged closure of European airspace in April due to volcanic ash, widespread industrial action in the UK and in Continental Europe, and severe winter weather at the end of 2010, each caused substantial disruption to airport and airline operations and, ultimately, to passengers;

- that there have been a number of recent studies into how well the UK aviation coped with the heavy snowfall and freezing temperatures in late November and in December[13];

- that the CAA has itself highlighted three areas where it considers performance should be improved (namely, maintaining airport operations; avoiding stranding passengers; and caring for passengers) and that it has put forward examples to illustrate how this might be achieved;

- that there is potential for different solutions to be appropriate for different airports and airlines and that a one-size-fits-all approach is unlikely to be the optimal solution; and

- that the CAA has indicated its preference for industry to lead on developing specific proposals on how improvements in performance can be delivered.

The Major Disruption Policy Development Group has been established to facilitate performance improvements in the three areas identified by the CAA, by identifying and sharing best practice and examples of 'best in class' performance. The CAA will remain the principal body responsible for monitoring and ensuring compliance with the relevant legislation and policy[14].

The Major Disruption Policy Development Group will:

- Review the recommendations made by CAA in its Final Report on Aviation's Response to Major Disruption.

- Identify possible alternatives to the CAA's recommendations based on existing best practice / 'best in class' performance.

- Summarise these findings in a short report, which can be disseminated widely and used easily by individuals who may not have taken part directly in the discussions.

- Identify, and liaise with, relevant bodies who can help deliver improvements in performance – typically individual airports and airlines, although other bodies, such as airport AOCs, may be especially relevant.

Membership

The initial membership will include:

- [Names and organisations]

There may be a requirement for further industry and government members as the Group's detailed work programme develops.

Other Attendees

- As required, the CAA (by invitation)

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[13] Namely, the Quarmby review, published in October 2010 and updated in December 2010; the inquiry of the Transport Select Committee (TSC), published in May 2011; and Begg enquiry, published in March 2011.
[14] The CAA plans a process of review during October 2011 to identify whether the industry will be better placed to deal with events that can lead to major disruption (e.g. snow).

- [Others]

Conduct of Business

- [To be agreed at the first meeting]