



CAA Consultation on Passenger Representation and Complaint Handling

As part of its Strategic Plan, the CAA has set out how it plans to develop a new approach to consider consumer issues. The plan also set out the objective that will define the CAA's consumer work:

To improve choice and value for aviation consumers now and in the future by promoting competitive markets, contributing to consumers' ability to make informed decisions and protecting them where appropriate.

An important part of our work is to identify consumer issues to inform our enforcement work and also to consider any areas where we need further information on consumer views. Replacing the Air Transport Users Council (AUC) with the proposed consumer panel will support this. We recognise that there is an increasing need to integrate consumer views into our decision making and this is particularly important in our economic regulation of Heathrow, Gatwick and Stansted airports. We also need to ensure that we focus our enforcement work on issues that are important to consumers.

The proposed changes to the AUC will provide a clear separation between advocacy and complaint handling. It will also allow the CAA to more effectively integrate complaint handling and consumer enforcement through bringing both teams into the Regulatory Policy Group. There is also scope for improving efficiency through sharing resources and providing access to policy colleagues across the CAA.

The Consumer Council for Northern Ireland provides consumer advocacy and a complaint handling service in Northern Ireland. We have no plans to change this role.

We welcome your views on our proposals set out below on the role and composition of the consumer advocacy body. We are also seeking your views on the Key Performance Indicators that we should adopt for handling complaints about consumer issues in the aviation sector.

The consultation will close on 30 June 2011. During the consultation period we will be holding a stakeholder seminar to discuss views, we will announce this on our website. We also welcome written comments, please send these to regulatorypolicy@caa.co.uk.

If you have any initial comments or questions please contact Barbara Perata-Smith on 020 7453 6202.

Aviation Consumer Advocate Panel

Role

The purpose of the Aviation Consumer Advocate Panel (ACAP) is to provide a forum for consumer advocacy in the aviation market. We see the Panel acting as a “critical friend” to the CAA, providing independent advice on the consumer issues that we should be considering. We do not envisage ACAP as having a public-facing role in campaigning on consumer issues.

In our view ACAP should be considering issues that impact on consumers who are the end-user of aviation services. Its work would therefore be focused primarily on passengers and would cover their interaction with the market in the UK, from booking a ticket, the airport experience, on-board the aircraft and making a complaint. We do not see ACAP as having a role in providing advocacy for businesses operating in the market.

We think that ACAP should interact with a range of other consumer organisations such as Which?, Consumer Focus, the passenger groups of Airport Consultative Committees and disability groups.

- *Do you agree with the proposed role?*
- *What are your views on the proposed scope of ACAP’s work?*
- *Are there any specific areas of the CAA’s work that you would expect the Panel to be involved with?*
- *Do you agree that ACAP should interact with other consumer organisation? Are there any other organisations that you think should be included?*

Membership

The CAA will require independent high-quality advice on a wide range of consumer issues. It will therefore need to ensure that Panel members have the necessary expertise to provide advice. We are expecting to recruit up to 10 Panel members.

We are proposing to recruit a mix of representatives including individual passengers, consumer policy professionals and representatives of special interests (e.g. regional areas, disabled people and the business community). One of the members could be a representative from the Consumer Council of Northern Ireland to ensure they can effectively feed in views. Economic expertise may also be helpful, to ensure the Panel can effectively contribute to the price control reviews at the south east airports.

- *Do you agree? Are there any other types of expertise that we should be looking for?*

Recruitment

The CAA will be recruiting for Panel members over the next six months. We are proposing an open process with an advertisement seeking applications and a selection process that will involve members of the CAA Board and other stakeholders.

- *Do you agree? Are there any specific interest groups that should participate in the selection process?*

Payment of Members

The AUC members were non-salaried, but the CAA funded their expenses and a dedicated secretariat support function. There were approximately 15 Council members who received travel expenses for attending Council meetings as well as some attendance at Airport Consultative Committee meetings. Colleagues in the CAA's Regulatory Policy Group will continue to provide secretariat support for ACAP.

We propose that at least the APAC Chair should receive payment to ensure that the right person can be attracted to the role. Other APAC members may come from the voluntary sector or consumer organisations and could therefore be expected to receive expenses or to fund attendance.

- *Do you agree that at least the APAC chair should receive payment? What is your view on funding for other APAC members?*

CAA Complaint Handling

The CAA currently funds the AUC's complaint handling role and moving this role into the Regulatory Policy Group has not changed the funding level. We do however expect that through streamlining the complaints and enforcement process this will provide efficiencies.

We also think that the change will ensure there is a single point of contact for all aviation consumers. In particular complaints about access to air travel for disabled and reduced mobility passengers are currently handled by the Equality and Human Rights Commission (EHRC). The Home Office/Government Equalities Office is currently consulting on proposals about the role of the EHRC and have suggested that this complaint handling role should be transferred to the CAA. You can respond to the consultation at

http://www.equalities.gov.uk/what_we_do/ehrc_reform.aspx

- *We would welcome your views on how we can ensure we integrate the CAA's complaint handling with existing airport or airline processes.*
- *Do you think that the CAA should handle all types of consumer complaints about aviation?*

Key Performance Indicators

- *We welcome your comments on the suggested KPI's below, together with views on the relevant metrics:*
 - Number of files / cases handled per complaints handler per day
 - Letter acknowledged within xx days
 - First substantive reply within xx days
 - Closure time – xx days between date first contact from passengers and file closed (dependent on industry standards and definition of closed)
- *Are there any additional KPI's that you think we should consider?*