



CAA guidance on Quality Standards under Regulation EC 1107/2006

Introduction

The aim of Regulation EC1107/2006 concerning the rights of disabled persons and persons with reduced mobility (PRMs) when travelling by air is to ensure that such people have the same opportunities for air travel as those of others, in particular that they have the same rights to free movement, freedom of choice and non-discrimination. A copy of the legislation is at Annex A.

In relation to airports, the requirements of the Regulation deal mostly with the assistance that airports are required to provide to PRMs (usually through a contracted service provider) to help them move around the airport. Given this, it is imperative that airports set appropriate quality standards for this assistance to ensure that it is delivered to a high standard.

It is also important that these service quality standards, and the performance against them, are made public so that PRMs can have the confidence to travel, knowing that their assistance needs will be met; and also so that they can hold the airport to account if the assistance provided by the airport did not meet expected levels. Making this information public should also allow PRMs to incorporate airport performance into their decisions over which airports to fly to and from. (This is consistent with our proposals for information for PRMs under our information duties under sections 83-93 of the Civil Aviation Act, where we are proposing minimum standards in terms of the information available on airport and airline websites for PRMs and for the accessibility of this information on the website.)

The purpose of this guidance is to help clarify the requirements of the Regulation in relation to the setting, monitoring, and publication of service quality standards, to ensure that the objectives of the Regulation are met, and to help give PRM passengers confidence that they will receive a high standard of assistance at an airport.

Publication of quality standards

All airports must publish their quality standard documents. These should be separate to any service level agreement with the PRM service provider.

It is important to ensure that a passenger can identify quality standards quickly and easily on an airport's website. Quality standards documents should be placed on 'special assistance' sections of airport websites.

What the quality standards should contain

Legal framework

The importance of setting, monitoring, and publishing service quality standards is recognised in Article 9 of Regulation EC1107/2006. Article 9 requires that airports with 150,000 commercial passengers or more "set quality standards" for the assistance specified in Annex I of the Regulation (Article 9(1)) and that these quality standards are published (Article 9(1) and (3)). Under Article 14 there is a specific obligation on the CAA, as the UK National Enforcement Body to "where appropriate...take the measures necessary to ensure that the rights of disabled persons and persons with reduced mobility are respected, including compliance with the quality standards".

The Regulation states that the quality standards must contain standards for the items listed in Annex I of the Regulation and that "full account" must be "taken of internationally recognised policies and codes of conduct" ... "notably the European Civil Aviation Conference (ECAC) Code of good conduct in ground handling for disabled persons and persons with reduced mobility" (Annex B). The quality standards must be set in cooperation with airport users and "organisations representing disabled passengers and passengers with reduced mobility".

The Regulation also allows for airports to agree higher standards, or provide additional services, for PRMs travelling with particular carriers. However an airline would be required to pay an additional fee per passenger to the airport for this enhanced service.

The ECAC Code and service standards

The ECAC Code at paragraph 1.6 (service standards and performance monitoring) provides a number of timeframes and percentage standards for assistance (these metrics are covered in more detail in subsequent sections of this guidance). Paragraph 1.8 of the ECAC Code specifies also that there

should be regular reviews to monitor the service provider's performance against the quality standards and to continually improve performance-monitoring systems.

The Code states also that the metrics referred to in paragraph 1.6 "represent the minimum levels of service" and it is clear that they do not cover all the areas of assistance that airports are required to provide under Annex 1 of the Regulation. The Code proposes that the metrics in paragraph 1.6 should be supplemented by a number of broader performance measures (paragraph 1.7 of the Code), including that

- all customers should be satisfied with the assistance provided;
- subject to pre-notification, 100% of departing customers who are at the designated point within the stipulated time should reach their aircraft in time to enable timely pre-boarding and departure;
- all employees, including the management, who deal directly with the travelling public at airports, should receive at least annual customer service training and disability awareness training.

It is the CAA's view that, although it is not mandatory for airports to implement every recommendation in the ECAC Code, the recommendations set out in the Code should, if implemented in full, deliver a performance framework that is compliant with Article 9 of the Regulation. It also, more meaningfully, should ensure that airports are able to give PRMs the confidence to travel knowing that their assistance needs will be met, to allow PRMs to incorporate information on the performance against the standards in their consumer decision-making, and to enable PRMs to better hold the airport to account if the assistance provided by the airport does not meet their expectations.

Departing passengers

Each quality standards document should include a requirement, as set out in the ECAC Code (paragraph 1.7), that "subject to pre-notification, 100% of departing customers who are at the designated point within the stipulated departure time should reach their aircraft in time to enable timely pre-boarding and departure". This will ensure that all passengers who have pre-notified at least 48 hours before travel and arrive either at check-in, or at a designated point, at the times requested by the airline (or if no time is provided arrive no later than one hour at check-in, or two hours at the designated point, before the flight time) will be provided with assistance that will get them to their flight on time.

For passengers who have not pre-notified 48 hours before travel, the airport (or PRM service provider) must make "all reasonable efforts" to get PRMs to the gate on time. The CAA's view is that airports should not attempt to quantify this in terms of a percentage. However, airports should note that the European Commission, in its 'Interpretative guidelines'¹ for the Regulation, expects airports "to take a proactive role in seeking to meet any request for assistance".

The ECAC Code (paragraph 1.6) stipulates targets for waiting times at landside "designated points" before assistance is first offered. These should also be adopted as the minimum standards. In addition to standards that measure time taken to move PRMs, airports should use more qualitative metrics (see section on passenger surveys) in order to get a fuller assessment of performance.

Transit passengers

In order to meet the obligation listed under Annex 1 of the Regulation to "reach connecting flights when in transit", each document should state that, subject to "minimum connection times", all passengers who have pre-notified at least 48 hours prior to travel should reach their connecting aircraft to enable timely pre-boarding and departure. For those that have not pre-notified, airports must "make all reasonable efforts" to reach the gate on time (again, the CAA's view is that this should not be quantified).

Arriving passengers

The ECAC Code only recommends targets for arriving passengers in relation to waiting times for assistance to disembark the aircraft. It does not recommend measures for other parts of PRMs' arrival journey through an airport (i.e. gate to designated landside arrival point).

Airports should, if practical, endeavour to set standards that measure the passenger journey on arrival in totality (i.e. from gate to designated arrival point). However, we recognise that there are factors which delay passengers that are outside the airport operator's control, such as time spent at baggage reclaim and immigration.

There appear to be three options, which are not mutually exclusive, to take this issue into account:

¹ http://ec.europa.eu/transport/themes/passengers/air/doc/prm/2012-06-11-swd-2012-171_en.pdf

- Airports can seek to try to set standards for, and measure the performance of, the arriving passenger journey in totality by making informed assumptions about waiting times at immigration, baggage reclaim, etc, where it is meaningful to do so. For example, an airport could take the average and longest expected baggage waiting time under normal circumstances (from the relevant Service Level Agreement) and the longest expected border control waiting time (from the relevant Service Level Agreement) and incorporate these into an arrivals metric.
- Airports can seek to set standards for, and measure key performance elements of, the assistance provided during the arriving passenger journey (for example assistance from the aircraft to the baggage hall, assistance from the baggage hall to a designated point, etc). This would likely mean that each section of the passenger journey would need to be measured separately. This is particularly important for those airports that do not immediately move PRM passengers directly through immigration to baggage reclaim from the gate, but instead keep PRMs waiting in a nearby “holding” area for further assistance once disembarked from the aircraft.
- As set out in the next section, airports can bolster the quantitative metrics used to assess performance for arriving PRM passengers by developing qualitative metrics based on passenger satisfaction with the assistance service.

Passenger surveys and market research

In relation to measuring performance against the more qualitative metrics set out in paragraph 1.7 of the Code, the Code recommends that airports conduct regular passenger surveys and market research (indeed, some of the larger airports already conduct this type of research). The CAA’s view is that such tools are necessary to give airports a more complete assessment of the quality of the assistance provided to PRMs, particularly in areas such as staff attitudes, behaviours and customer service skills.

Our view is that it would not be appropriate for the CAA to define the qualitative metrics that each airport must set, nor the mechanisms through which each airport should conduct passenger research. Each airport will need to decide what such passenger surveys should cover, and the frequency with which they should be conducted, depending on the individual circumstances of that airport (and in consultation with the relevant bodies as required by Article 9(1) of the PRM Regulation - see below). The CAA does recommend that, for larger

airports, surveys of PRM satisfaction should be conducted annually. An example PRM satisfaction questionnaire is provided in Annex C.

Consultation

Article 9(1) of the PRM Regulation requires that airports set quality standards in conjunction with airlines through the Airport Users Committee, if one exists. If not, it must ensure it arranges for an alternative form of consultation which includes all airlines operating from the airport.

It must also consult "organisations representing disabled passengers and passengers with reduced mobility." The Department for Transport Code of Practice² for disabled persons and persons with reduced mobility suggests that airport operators could involve "local access/disability groups whose membership would include users of airports" and provides a list of questions which airports can use to assess the suitability of groups (paragraph 5.3 and Annex 8). Ideally organisations or individuals representing a wide array of disabilities and mobility issues should be consulted.

Including regular PRM passengers is an option if possible, perhaps those who have made complaints or compliments to the airport about the PRM service. Consultation should, as much as possible, include practical inspections of airport services (generally using 'walk-throughs'). Airport operators should also consider convening regular forums containing representatives of disability groups and individuals.

Quality standards documents should make clear that consultation has taken place and list who the organisations were; when they were consulted; and how their views were taken into account (both for airlines and disability organisations).

Monitoring performance against the quality standards

Airports should collect data that measures performance in relation to the quality standards document. Airports should submit data to the CAA on its performance against its quality standards twice yearly (generally on a seasonal basis and within one month after each season). This should include detailed information on any incident where a passenger's flight has departed without them as a result of them being delivered late to the gate. Airports should also report to the

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<http://webarchive.nationalarchives.gov.uk/+http://www.dft.gov.uk/transportforyou/access/aviationshipping/accesstoairtravelfordisabled.pdf>

CAA the results of any PRM passenger surveys. In addition, the data should be published on airports' websites with a clear link to the quality standards documents.