



Regulatory Policy Group
Group Director's Office

Dear colleague

Consumer protection during the Olympic and Paralympic Games

As you are aware, there are a number of key dates over the Olympic period this summer where a number of UK airports are likely to experience significant volumes of passengers. Whilst we are aware that this is a busy period anyway for airports and airlines, transporting large numbers of Olympic and Paralympic athletes over a short period, together with their baggage and, potentially, specialist mobility equipment, will be a unique and unprecedented challenge for UK aviation.

My colleagues in the CAA's Regulatory Policy Group have held a number of meetings with many of you over the last few months to better understand the challenges that you expect to face and the measures you are putting in place to meet these challenges. The feedback I have received from these meetings has been positive. It is clear that the UK aviation sector is putting significant efforts into ensuring that it is prepared to meet the unique demands of the Olympic and Paralympic Games period, specifically to meet the needs of the Games family and supporters whilst ensuring business as usual passengers are not unduly affected. I would like to take this opportunity to thank you for the work you have done so far in preparation for the Games.

As I am sure you will agree, we need to maintain our focus on this period to ensure that things go smoothly. Given this, I felt that it would be helpful to write to you to share our views on the issues which we believe to be most pressing, in terms of passenger protection, and also to share the information we have gathered from our interaction with the various stakeholders and our observations of various Paralympics test events. Summaries of the main issues are attached to this letter. I hope these are of interest to you.

One of the critical areas where we have focussed our attention is in relation to 'Persons with Reduced Mobility' (PRMs). Although exact figures for the numbers of PRMs travelling during the period are not yet available, we can reasonably expect an unprecedented number of PRMs at certain London airports on key dates around the Paralympics. The feedback we have received from industry is that, although plans are being put in place to meet this challenge, it is likely to stretch the resources of many airports, airlines and PRM service providers. This view is supported by the observations my colleagues have made of a number of Paralympic 'test events' at London airports over the last month. The potential for resource and / or infrastructure constraints to lead to wider disruption to business as usual should not be underestimated, especially where turnaround times for flights are tight and there may be a number of PRMs travelling with, in particular, electric mobility equipment.

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Whilst the information that we have been presented with, and that which we have gathered ourselves, indicates that we should not expect major disruption around the Olympic and Paralympic Games as a direct result of handling the Games family and supporters, it is important that we continue to plan for the worst. In this regard, I would like to stress the importance of airports and airlines collaborating to find practical solutions to minimise any disruption to schedules and to mitigate the adverse impact of delays on welfare, and for all parties to share information about capabilities and likely passenger flows.

Should disruption occur around the Games period, airlines will also need to discharge their obligations under Regulation (EC) 261/2004. In particular, airlines will need to be thinking now about how to meet the likely need for meals and refreshments and, if the disruption is prolonged, how they provide overnight hotel accommodation, or support passengers to make these provisions themselves. In addition, depending on the nature of any issues that arise, airports and airlines may need to discharge their obligations under Regulation (EC) 1107/2006, concerning the rights of PRMs when travelling by air.

If you have any comments on the list of issues or believe there to be other issues which need to be addressed or are more pressing then we would be grateful to hear from you. Please contact my colleague, James Fremantle, on 020 7453 6731 or james.fremantle@caa.co.uk. We want to do all we can to support your efforts to protect passengers in the challenging circumstances that are likely to arise over the next few months. In any case, we plan to keep in close contact with all the main stakeholders in the run up to, during, and post Games.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Iain Osborne', with a stylized flourish at the end.

Iain Osborne

1 Turnaround times

Data from LOCOG is not yet available on the likely numbers of passengers on flights but the likelihood is that the peak days for arrivals at airports will involve the handling of higher than average number of wheelchair passengers. It is possible that high numbers of wheelchair passengers could impact the efficient disembarkation of PRM passengers from aircraft. This could adversely impact turnaround times and potentially result in extended delays and cancellations to outbound flights. This is a particular risk in respect of single aisle aircraft with short turnaround times – generally intra-Europe short haul flights – and where it involves the handling of heavy and / or electric mobility devices (which require extra handling).

At the recent test events at Heathrow that the CAA observed, it noted that in a number of cases where these conditions existed the turnaround times were not met and short delays (15-45 minutes) occurred.

We know that airport operators have already consulted airlines and National Paralympic Committees in order to understand patterns of arrivals and departures and aircraft types to best facilitate the handling of flights with a high volume of PRMs. We welcome initiatives such as using larger aircraft to deal with high volume PRM Paralympic Team flights, scheduling Paralympic Team flights during periods of the day when the best equipped stands are available and spreading teams across a number of flights.

We would like to encourage further collaboration between airports, airlines, PRM service providers and groundhandlers, in particular in jointly reviewing the available data on the expected volume of PRMs over the Games period, and collaboration on solutions to ensure that greater resilience can be built in to these operations. In addition, PRM service providers should try to cross-check their information on arrivals and departures with the LOCOG data.

Clearly, in order for this to be effective, accurate data needs to be passed from airline to airport during the pre-notification process. At the recent test events, the CAA observed that on a number of occasions the data provided to the PRM service provider was different to that provided to LOCOG.

2 Service to PRMs

The need to look after passengers extends to all airlines, airports and PRM service providers, and points to the need for close working and collaboration between all parties. In our recent observations of a number of Paralympic test events, we were impressed by the speed of handling of the team members, with the PRM service provider routinely disembarking manual wheelchair passengers in 1 to 2 minutes per passenger. My colleagues also received positive feedback about the process from the athletes they spoke to.

However, should issues with handling large numbers of PRMs materialise, airlines and airports (through their service providers) will need to make sure that they discharge their obligations under Regulation (EC) 1107/2006.

3 Handling of electric mobility devices

Following a fire in 2008 involving an electric mobility aid, investigations suggested

that during flight, baggage moved the control joystick engaging the motor causing friction or an electrical load leading to ignition. The CAA recently published Safety Notice 2012/003 to remind stakeholders of their responsibilities for the ground handling and safe carriage of electric mobility aids. The Safety Notice explained that under Regulation (EC) 1107/2006, airport operators are responsible for the ground handling of all necessary equipment, including electric mobility devices. It also expressed concern that the lines of communication and levels of co-operation between travel agents, tour operators, aircraft operators and airport operators are not fully effective in ensuring that adequate instructions are obtained and communicated to the personnel tasked with fulfilling the responsibility of an airport operator to make electric mobility aids safe for carriage.

During inspections of recent test event flights, the CAA's Safety of Foreign Aircraft (SAFA) Inspectors found that in one instance, the electric circuits of an electric wheelchair had not been inhibited to prevent inadvertent operation, i.e. the device switched on and moved using the controls. On a number of occasions, electric mobility aids had not been protected from potential damage by the movement of baggage, mail, stores or other cargo loaded in same compartment or Unit Load Device, but not independently secured. Whilst these inspections involved inbound aircraft, stakeholders are urged to ensure that the issues raised within Safety Notice 2012/003 are addressed.

4 Pre-notification

There is general agreement amongst all stakeholders that accurate pre-notification of the requirements of PRMs passengers is the key to providing a high quality service to PRM passengers. The CAA recently observed the departure of the GB Disabled Shooting Team which included six wheelchair users. These passengers had been incorrectly categorised as WCHR (generally PRMs who can walk but need help with long distances e.g. elderly) and not WCHC (generally wheelchair passengers). The PRM service provider and airport operator acted quickly once it had received correct information and it did not have an undue impact on the flight but it could have prevented the PRM service provider from being able to use its resources efficiently, which in turn contributed to the flight departing 40 minutes late.

5 Repatriation of mobility devices

We are aware that, at some UK airports, there is an issue with the consistency with which mobility devices are repatriated to PRM passengers at the aircraft door on arrival. Instead wheelchairs go straight to baggage reclaim resulting in a wait for the passenger (as the wheelchair has to be reclaimed from the baggage hall and brought back to the aircraft door) or the passenger has to use a wheelchair provided by the PRM service provider (which may not be ideal suited to the passenger's requirements). The DfT Code of Practice on access to air travel for PRMs states that that "for those disabled passengers using a wheelchair, their own wheelchair should be available as soon as practical upon leaving the aircraft. Where facilities exist to return wheelchairs to the aircraft, wheelchairs should be delivered to the passenger on disembarkation from the aircraft and should not be taken to the baggage hall unless the passenger has specifically requested it". During our recent observation of Paralympic test events we found that, with some arrivals, it took the intervention of the PRM service provider to ensure that ground handlers repatriated wheelchairs to the aircraft door. There was also inconsistency in the handling of wheelchairs with some handlers bringing them to the aircraft door and others putting them in a lift.

In addition, there were issues surrounding the speed at which mobility devices were

repatriated, which can both impact on turnaround times (see above) and the comfort of the passengers. Handling agents must be mindful on arrival of the need to get the devices out the hold as soon as possible and up to the aircraft door ready to begin the process of disembarking wheelchair passengers as soon as other passenger have left the aircraft. Similarly on departure it takes time to secure mobility devices in the hold once delivered to the ramp area.

6 Stand planning

We are aware that airports have put much thought into stand planning during the Paralympics, particularly in relation to handling of wheelchair passengers. We welcome airports' efforts to take into account the requirements of PRM passengers to ensure that flights can be handled adequately using the infrastructure or processes in place at the allocated gate and parking stand and therefore meet the demand for large volume PRM movements as required. However, as pointed out above, this will require close co-operation with LOCOG in order to get detailed information on PRM requirements.