UK Civil Aviation Authority

Performance framework for airline accessibility: Summary of responses and decision document

CAP 2486A

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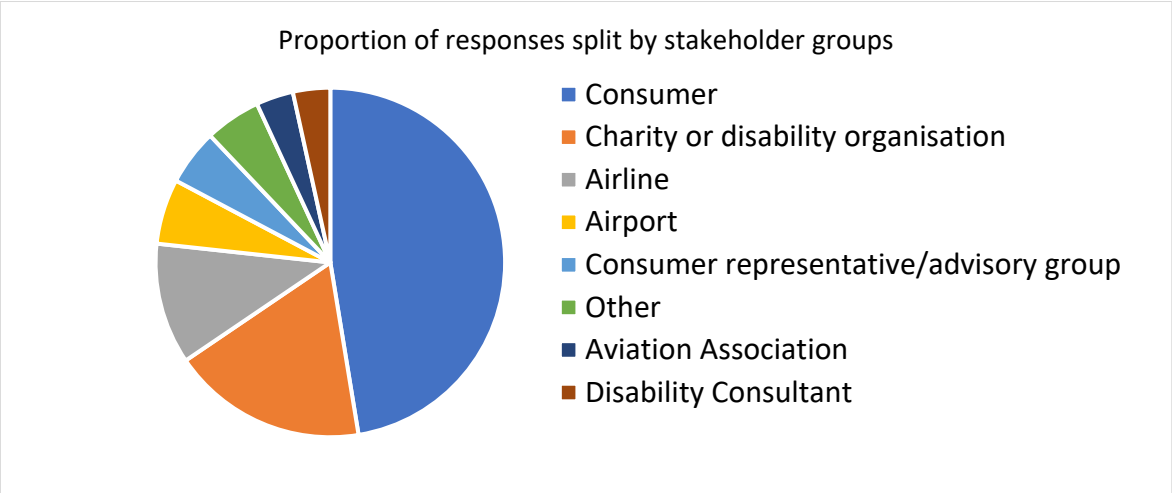
Introduction

1. The CAA's consultation on proposed guidance on the introduction of a performance framework for airlines under Assimilated Regulation (EU) 1107/2006 ('the Regulation'), concerning the rights of disabled persons and persons with reduced mobility when travelling by air, was published under CAP 2486 ('the consultation') on 25 April 2023. This consultation closed on 21 July 2023.

2. In total the CAA received 116 responses to the consultation, with these being received from the following categories of stakeholders:

   - Airlines
   - Airports
   - Aviation associations
   - Charity or disability organisations
   - Consumers
   - Consumer representative/advisory groups
   - Disability consultants
   - Other

3. The chart below shows a breakdown of the proportion of responses the CAA received from different stakeholder groups, although we note that in the case of responses from consumers, in many cases these were in respect of specific areas of the framework rather than responding to the entire consultation document.



4. This paper sets out a summary of responses to the consultation and combines comments made in writing via an online form on the CAA's consultation page or via email and via phone.

5. Throughout this document, responses are presented following the structure of the key questions asked in each section of the consultation. In addition, we have provided a summary of the general comments on the guidance and on the key proposals.

6. Because of the high number of individual standalone comments provided by respondents we have not responded to each comment directly in this document. Instead, we have set out the main themes of the comments received and our response to these.

Chapter 1

Overall views on the introduction of an Airlines Accessibility Framework and CAA decision

7. Overall, responses were largely supportive of the introduction of a standardised framework against which airlines can be assessed against their obligations under the Regulation.

8. We received a significant number of responses on 'technical' aspects of the guidance, reflecting the general expert knowledge of respondents. We are grateful for the level of detail provided by respondents on these 'technical' aspects and have incorporated many of these points into the final guidance document.

9. Most of the guidelines in the consultation were not 'new'. Instead, they consolidated a number of pieces of guidance already published[1]. The CAA has long considered that adherence to these guidance documents helps demonstrate compliance with the Regulation.

10. We noted that many of the comments on the technical aspects were asking for the CAA to introduce new obligations on airlines in terms of new legislation and through additions to existing guidance. It is not the CAA's intention to issue guidance which contradicts existing recognised UK and international guidance.

[1] Assimilated Regulation (EU) No 1107/2006 concerning the rights of disabled and reduced mobility persons when travelling by air.

- European Civil Aviation Conference Document 30, as amended in September 2021

- CAP2241 (Interpretative Guidelines on the application of Assimilated Regulation (EU) No 1107/2006 concerning the rights of disabled and less mobile persons when travelling by air)

- International Civil Aviation Organisation Manual on Access to Air Transport by Persons with Disabilities CAP1603: CAA guidance for airlines on assisting people with hidden disabilities

- Assimilated Regulation (EU) No 261/2004 establishing common rules on compensation and assistance to passengers in the event of denied boarding and of cancellation or long delay of flights as retained in UK law

- International Air Transport Association's (IATA) Passenger Accessibility Operations Manual

- International Air Transport Association's Resolution 700 – Acceptance and carriage of passengers requiring special assistance

- For UK airlines, UK Regulation 965/2012 (Air Operations) provides requirements and guidance on carriage of special categories of passengers

It is also not in the remit of the CAA to introduce new legislation. This can only be achieved in the UK by the UK government.

CAA decision

11. Due to the general positive nature of the responses received, the CAA has decided that it is appropriate to introduce airline accessibility guidance and a standardised framework against which airlines can be assessed against their obligations under the Regulation. We will refer to this as the "Airlines Accessibility Framework".

12. Accompanying this "Summary of Responses" document, we have published a final version of the Airlines Accessibility Guidance (CAP2990). This incorporates changes made following receipt of feedback in the consultation.

13. The Airlines Accessibility Framework is a guidance document for airlines which we hope will support airlines to meet the Regulation and applicable guidance in this area, as well providing consumers with information on their rights.

14. Since publication of the consultation, the European Civil Aviation Conference (ECAC) has published an updated version of Doc 30. We have updated the final version of the Airlines Accessibility Framework to reflect these changes. We will consider further updates to the Framework in the future, as needed, to reflect further changes to international guidance.

15. Following the feedback received, we have decided that, rather than assessing individual airlines against the whole framework on an airline-by-airline basis, the CAA will undertake assessments on a subject area-by-subject area basis. This will enable the CAA to undertake assessments of each individual subject area for a larger number of airlines at the same time. It will also enable us to select areas where we have the greatest concern or where we believe it will bring the greatest benefit to disabled and less mobile passengers.

16. We will publish reports as they are finalised for each subject area (or group of subject areas). Each report will build on the previous one, providing, over time, a fuller picture of airline accessibility performance for airlines.

17. We plan to publish our reports on the CAA website. These will be in an accessible format. Undertaking assessments on a subject area-by-subject area basis has the advantage of enabling disabled and less mobile passengers to read only those reports which are relevant to their needs, and to compare the provision of services for their needs all in one place. We believe this will be far clearer for passengers.

18. As with airports, where we find issues, we will work with those airlines and only finalise our reports after a period, giving airlines time to engage with us and rectify issues, with our support.

19. Following feedback on proposed criteria for rating each subject area, we have decided to limit assessment ratings to 'good', 'needs improvement' and 'poor'. We will not include a 'very good' rating. This reflects the wide range of views on the criteria required to achieve 'very good' with responses demonstrating there is currently insufficient agreement between stakeholders to progress with a ranking system entirely in line with the Airports Accessibility Framework[2].

20. Given our approach to undertake assessments on a subject area-by-subject area basis, we also do not have initial plans to award ratings to airlines on their overall accessibility. Instead, we will include a table on our website which lists airlines assessed and records the ratings achieved by subject areas. Over time this will build up a picture of how well each airline complies with each area of the passenger journey against the Regulation.

[2] CAP1228: Guidance on quality standards under Regulation EC1107/2006

Chapter 2

Summary of responses on the introduction of an Airlines Accessibility Framework

General comments received

21. Some respondents, mainly consumers, set out throughout their responses that guidelines are not sufficient and that the law should be strengthened. While noting this comment, the CAA has not repeated this in the responses to questions in this summary. Instead, this has been included in question one. We would also note that any change in legislation would require action by the UK government.

22. One consumer representative group said that improving accessibility across the end-to-end journey is a large piece of work and that one consultation phase may not be enough.

23. Respondents said that the CAA should ensure it provides accessible reporting of the data gathered with detail on the emerging issues and trends. Several respondents also added that the team in charge of these reviews should be given adequate tools and resources to carry out this work and tackle poor performance.

Q1. Do you agree we should introduce an Airlines Accessibility Framework?

24. The CAA received 109 responses for this question, 82 of which said that they supported the introduction of a framework. 25 respondents did not support the introduction of a framework and 2 respondents neither agreed nor disagreed. 20 respondents said that the performance framework should not replace any potential changes in consumer legislation and that new legislation should be a priority for Government.

25. Several respondents said that there should be penalties alongside the airlines framework to be used if airlines are found to be in breach of the requirements set out in the framework.

26. Eight airlines / airline associations said that some of the requirements set out within the framework exceeded regulatory requirements. They raised concerns over the complexity and challenges such a framework may cause with other compliance requirements in different jurisdictions. However, some of these respondents did overall support the implementation of a framework.

27. A large number of respondents were optimistic about the prospect of an airline accessibility framework and said that the framework would promote consistency across industry and boost confidence for consumers in that they would receive a service that meets their requirements. Respondents welcomed the CAA's attention to detail.

28. One respondent noted that for areas covered by the Equality Act the use of 'Good' and 'Very good' rating criteria may risk undermining the requirement of the Act. They suggested that in some circumstances areas which would be considered requirements under the Equality Act (as well as other international obligations), the CAA had defined as 'very good'.

Chapter 3

Pre-Journey

Website accessibility and the provision of essential information

General comments and reoccurring trends

29. The questions in this section received similar answers. Throughout question two to six many respondents stated in different sections that more information should be available for passengers with non-visible disabilities and that there was a general need for improved information on airline websites (including making it easier to find) to provide clarity to consumers as to whether their assistance needs would be met. Respondents also suggested that there is scope to review the terminology used to describe air services, as airlines use different terminologies to describe the same services.

30. Some respondents also suggested that not everyone will be able to request their assistance online and it is important for many to be able to speak to a person to explain their requirements and be able to discuss the assistance options available.

31. A large number of respondents welcomed the CAA's proposal to ensure that passengers are not excluded from accessing information and services when using airline websites.

Q2. Are the proposed criteria to achieve a 'Good' and 'Very Good' assessment level in relation to website accessibility and the provision of essential information appropriate? Should the CAA consider setting the standards at a different level (please explain your rationale)?

32. We received 70 responses for this question. 45 respondents agreed that the assessment levels were appropriate, 20 disagreed and 5 respondents added comments on the proposed criteria but neither agreed nor disagreed.

33. Although most respondents agreed, some made suggestions where the CAA may want to consider changing, or adding, to the assessment criteria.

34. Four respondents, which included airlines as well as consumers and their representatives, said that they would welcome more clarity in the rating criteria, such as adding more information on what the CAA considers a reasonable timeframe to make a website or application WCAG conformant and how airlines can demonstrate that they have a budget in place to achieve this.

35. Some airlines stated that it is not feasible for them to notify passengers in every instance of an aircraft change as often these occur last minute, and many airlines have the same provisions across their fleet. There is added difficulty with notifying consumers when they made their booking via a third party such as an online travel agent.

36. Respondents generally supported the recommendation that essential information should be one click away from the homepage, although some airlines requested more clarity on the term 'one click from the homepage' such as when a cursor 'hovers' and what is considered as 'the homepage'.

37. Several consumer respondents considered that airline websites and applications being conformant to WCAG should be a requirement and be therefore moved to the 'Good' criterion instead of 'Very Good'. There were different views as to whether compliance should be rated with respect to 'WCAG', 'WCAG 2.1' or 'WCAG 2.2'.

Q3. Do you agree that airlines' websites and applications conforming to the latest Web Content Accessibility Guidelines (currently WCAG 2.1) is best practice? Are there any examples that you would highlight of good practice for website accessibility either in the aviation sector or elsewhere which would be more appropriate?

38. We received 64 responses for this question. 54 respondents generally agreed that airlines' websites and applications conforming to the latest WCAG guidelines is best practice. Nine respondents disagreed and one respondent added comments but neither agreed nor disagreed.

39. A large number of respondents were supportive of assessing airlines' websites against WCAG compliance.

40. Some airline respondents expressed doubts over auditing against WCAG standards. Respondents mentioned that there is a risk that the results may be inconsistent as different providers may assess accessibility differently and that there are many different assessment tools available with varying standards.

41. Three respondents also noted that even if a website or application is fully WCAG compliant this does not guarantee usability. It was noted that airlines should consider using third parties and consumers with lived experience that use assistive technology to conduct tests.

Q4. Do the criteria adequately take into account commercial considerations for airlines?

42. We received 54 responses to this question with 39 respondents agreeing that the criteria adequately take commercial considerations into account. Seven respondents neither agreed nor disagreed.

43. Several consumers and their representatives stated that the cost of compliance should not be given consideration.

44. A number of airlines also suggested that the framework should distinguish between airlines in terms of the size and complexity of their operations, as well as different business models. The CAA should consider the complexity of upgrading legacy systems and platforms, as some of the changes required may need re-platforming of websites. One airline said that they offer flights with third-party airlines as part of packages and that they are not able to influence the website accessibility of other airlines.

Q5. Do the essential information requirements sufficiently meet the needs of disabled passengers? Would it be helpful to require any additional information, possibly to achieve a 'Very Good' rating?

45. We received 60 responses for this question. 27 said that this was not sufficient, 29 respondents agreed that this was sufficient and four respondents did not answer in a way that could be deemed as considering the essential information requirements as either sufficient or insufficient.

46. Many respondents suggested that more information should be available for passengers with non-visible disabilities.

47. Five respondents said that information on websites should be more extensive. Examples mentioned were that information should cover limitations for the use of postural devices. Respondents also mentioned that they would welcome information on what to expect when travelling, including information on the cabin environment, such as aisles, seats, seat allocation, toilets, and doorways.

48. Conversely, some respondents, in particular airlines, noted that supplying all conceivable information could lead to an overwhelming and less accessible experience for consumers.

49. One airline suggested that it was not practical or fair for disabled passengers to be able to cancel their booking or rebook for a change of operating carrier.

50. One airport advised that in their passenger feedback form, many consumers state that they wish they had access to more information in advance. The airport respondent suggested that the CAA may want to consider adding to the 'Very Good' criteria that airlines include links to airports' special assistance pages for consumers to read more about the assistance available.

Q6. Would generic information on passenger rights regarding accessibility be useful to supplement information provided by individual carriers?

51. The CAA received 68 responses for this question with 57 respondents stating that this would be useful. Eight respondents answered this question saying that providing generic information on passenger rights regarding accessibility would not be useful and three respondents added comments without indicating if this would be useful or not.

52. Some respondents suggested that the usefulness of this information would depend on the content but that in general this can increase transparency and accountability of airlines. It was also suggested that consideration should be given to the multiple jurisdictions and regulatory frameworks in which airlines operate.

Requesting assistance and pre-notification

Q7. Are the proposed criteria to achieve a 'Good' and 'Very Good' assessment level in relation to requesting assistance and pre-notification appropriate? Should the CAA consider setting the standards at a different level (please explain your rationale)?

53. The CAA received 70 responses for this question with 35 respondents generally agreeing that the assessment level is appropriate, 7 not answering the question, and the rest disagreeing.

54. Respondents generally supported the CAA's position for airlines to offer different channels for passengers to notify their assistance needs.

55. Six industry stakeholders raised concerns over including free text boxes to add information about passengers' needs, stating that many airports only allow for IATA codes to be transmitted to their system and that notes can be open to interpretation.

56. Eight Respondents, which included consumers, their representatives, airports, and their representatives said that the minimum pre-notification level should be much higher in the 'Very Good' category. Some added that the CAA should also add a minimum pre-notification level in the 'Good' category.

57. In contrast, several airlines and their associations were concerned over including a minimum pre-notification percentage in the rating category. Airlines noted that the pre-notification levels that they report may not match the pre-notification levels that airports report to the CAA. This may be down to limits on the compatibility of software of the airline and the airport.

58. One airline also stated that they have previously requested detailed pre-notification records from airports at a passenger level to improve pre-notification, but that airports were unable to produce this regularly. They questioned how airports verify assistance provider's data.

59. In addition, a number of airlines suggested that more passenger awareness about the importance of pre-notifying is needed, adding that more responsibility should be put on consumers to pre-notify. Some airlines said that they engage with direct trade partners but that they would not be able to engage with all trade partners. They said that they would welcome intervention from the CAA, including a review of the joint guidance published by the CAA and the Association of British Travel Agents in 2012.

60. One airline respondent added that carriers that operate routes used by passengers with a critical medical situation, or who are undergoing inpatient treatment in a hospital, often have low pre-notification levels as flight tickets often get booked on a last-minute basis. The airline suggested that there should be exceptions for any pre-notification standards for airlines that operate on these protected routes.

61. One consumer said that it should be a requirement for airlines to ensure that the assistance is carried over in situations where the booking is changed (for example following a flight change).

Q8. Are there additional actions which the CAA could require of airlines to further improve pre-notification levels?

62. The CAA received 67 responses to this question, with 44 respondents stating that there are additional actions the CAA could require of airlines. 19 respondents stated that there are no additional actions the CAA could require of airlines and four respondents added general comments.

63. Five stakeholders suggested an industry wide notification platform that passengers can use to notify both airlines and assistance providers at the airport about their assistance needs, like that used in the rail sector.

64. A few airlines, airports and their representatives welcomed more active involvement from the CAA in improving pre-notification levels, as the quality and accuracy of the data transmitted depends on several parties.

65. Several respondents, including airlines, a charity, and a consumer advisory group, said that it was important to understand the limitations of IATA assistance codes and update them. The charity said that the IATA codes are outdated and do not represent the complexity of assistance needs. Two airlines suggested adding subcategories to existing codes to further explain the specific assistance required.

66. A number of airline respondents suggested that the CAA make additions to the airport accessibility framework. Suggestions made were:

- providing regular and accurate reporting to airlines of individual passenger who have used the assistance services to enable automated reconciliations,
- airports advertising on their website and other channels that passengers should pre-notify their airline about their assistance needs.

67. Some respondents suggested adding a mandatory field in the booking flow for passengers and travel agents to complete, asking if assistance is needed, to ensure that more assistance requests are captured. In contrast some airlines and their representatives said that including assistance requirements in the booking flow may encourage assistance requests from consumers who want to fast track their journey by bypassing security rather than ones that genuinely require assistance.

68. One consumer representative group said that when all passengers are sent an email confirmation with their booking, airlines should promote that passengers should pre-notify any assistance needs they may have, as passengers may see the benefits of seeking assistance upon reflection.

Access and medical clearance

Q9. Are the proposed criteria to achieve a 'Good' and 'Very Good' assessment level in relation to access and medical clearance appropriate? Should the CAA consider setting the standards at a different level (please explain your rationale)?

69. The CAA received 60 responses to this question, with 38 respondents agreeing with the suggested rating criteria. 21 respondents disagreed with the rating criteria and one respondent did not answer this question in a way that could be deemed as agreeing nor disagreeing.

70. Six respondents, which consisted of airlines and associations, did not support the rating criteria to store medical information. Their reasoning was that storing the information may be in breach of data protection laws and that medical conditions can change. This may result in information being outdated and wrong assumptions about the assistance needed.

71. Other respondents supported this rating criteria, with some adding that consumers should be able to say how long this information should be stored for and should also be able to update this information later.

72. Five airlines commented on the CAA's suggested rating criteria to have no limit for numbers of passengers requesting assistance unless for reasons set out

under the Regulation. They said that airlines must adhere to European Aviation Safety Agency limits as outlined in CAT OP MPA 155 ‘Carriage of Special Categories of Passengers’. This stipulates that the number and categories of Special Category Passengers should not exceed the number of passengers capable of assisting them in case of an emergency. In line with this safety requirement, airlines can allow for up to 50% of passengers onboard an aircraft to classify as a disabled person. The same point was made by some carriers for question ten.

73. Another airline said that different carriers might use different criteria for medical clearance depending on short-haul and long-haul flights, particularly the latter. Extended flight times can expose passengers to additional health risks, such as deep vein thrombosis and those brought on by reduced humidity levels and recycled air, all of which may worsen a pre-existing medical condition. Another consideration for long-haul flights is that they may spend a significant amount of time a considerable distance from healthcare facilities. It was therefore recommended that the Framework should differentiate between long-haul and short-haul flights.

74. One charity pointed out that often the process of submitting the required medical documentation, such as printing out paperwork, filling it in, signing it and then scanning it to send back, is not accessible and suggested that the process should be streamlined and made accessible for all.

75. A few consumer respondents considered that seeking written approval, such as doctors' letters, from healthcare professionals for every trip can put unnecessary burdens on the NHS and be quite costly for consumers.

76. A number of respondents welcome more transparency and consistency for medical clearance processes across airlines.

77. Some respondents asked for more clarity on what the CAA considers ‘reasonable and proportionate’.

Q10. Is there anything additional that the CAA should consider allowing people to be confident they will not be denied boarding because of their disability or reduced mobility?

78. The CAA received 57 responses for this question, with 36 respondents stating that there should be additional considerations, 19 respondents said no additional considerations and two adding general comments. Several respondents answered this question similarly to question nine.

79. Four respondents stated that there is a need for formal confirmation that the passenger’s assistance has been booked.

80. Four respondents said that there is a need for more staff training and guidance for staff to have open conversations with passengers about their requirements.

81. An airline respondent said that the CAA could consider an education initiative to help drive consumer awareness of their rights and the importance of passengers contacting airlines about their assistance requirements and informing them of their medical conditions.

82. A few respondents also welcomed pre-clearance for medical devices and batteries of mobility equipment.

83. One consumer and one consumer advisory group also suggested that, where airlines have received accurate information and documentation ahead of the journey and the passengers are still wrongly denied boarding, the airline should be required to pay the passenger compensation instead of just a reimbursement of expenses or arranging re-routing. They should also consider paying this to family and friends travelling with the passenger, in particular the passenger's accompanying person.

Q11. Do you agree with the criteria set out by IATA under Resolution 700? What could be additional criteria?

84. The CAA received 51 responses for this question, with 40 respondents agreeing with the criteria set out by IATA under Resolution 700 and the remaining respondents disagreeing.

85. One consumer advisory group noted that some parts are open for interpretation and should be more specific, such as 'has a condition which may affect the safety, health, or comfort of other passengers' or 'has a condition which could be a hazard to safety of the flight or punctuality' and that airlines could elaborate on the criteria to give passengers more information.

86. Another consumer advisory group and a disability consultant also suggested that the document has an outdated approach to disability and does not use appropriate terms and encouraged the CAA to influence IATA to update their language before incorporating it into this framework.

87. One airline also noted that, depending on the routing of flights, carriers may have to adhere to other national regulations in place, for example for transatlantic flights carriers must adhere to US Department of Transportation (DOT) rules.

Accompanying persons

Q12. Are the proposed criteria to achieve a 'Good' and 'Very Good' assessment level in relation to accompanying persons appropriate? Should the CAA consider setting the standards at a different level (please explain your rationale)?

88. The CAA received 60 responses for this question with 34 respondents agreeing that the proposed criteria were appropriate, four did not answer in a way that could be deemed as agreeing or disagreeing and the remaining respondents stated that the criteria was insufficient.

89. Most respondents interpreted the CAA's guidance and assessment criteria to mean that it would be the passenger's choice to travel with an accompanying person and that the accompanying person should be offered a discounted rate upon the passenger's request. However, the intention of the CAA's guidance was that a discount for accompanying persons should be available when the accompanying person is required by the airline to follow safety regulation.

90. 11 airlines and their representatives responded to this question with five stating that they did not agree with this assessment criteria and one's answer not indicating if they agreed or disagreed with the proposed rating criteria.

91. The main concern set out by airlines and their representatives were over the CAA's proposed 'very good' criterion. They said that incentivising airlines to offer discounted fares to companions may result in the inappropriate use of such a policy and more assistance requests. Similar concerns were raised by a charity, which was supportive of the CAA's suggested category but considered that other sectors have found ways to prevent the abuse of such policies.

92. Several airlines said that there is no clear guidance on how carriers should check the legitimacy of assistance requests. It was proposed that any such requests should be backed by an independent accreditation system to verify the safety assistant requirement, like that proposed for assistance dogs, to avoid confusion and ensure uniform application.

93. Some airlines, as well as a consumer advisory group, said that this would require a method of supervision and enforcement to avoid misuse. An airline added that this requirement could potentially lead to passengers being asked to supply evidence of their disability or medical condition, which is not currently a requirement and may make passengers' experiences worse.

94. One airline added that significantly discounted fares for accompanying persons could lead to higher fares overall to absorb the cost and put certain airlines at a competitive disadvantage. The airline added that this might reduce the

accessibility of air travel for vulnerable people. Another airline made a similar point in their response to question 13.

95. A number of respondents also stated that the proposed criteria would require further explanation as to what the CAA considers reasonable and proportionate.

96. An airport respondent suggested that the CAA should add a criterion under the 'Good' category to notify an airport that the consumer is travelling with a companion to avoid complications when the passenger arrives at the airport.

97. Most charities, consumers and their representatives were generally supportive of the rating criteria. Several respondents said that offering discounted tickets should fall under the 'Good' category. It was also suggested that airlines would most likely not offer this to passengers but that passengers would have to request this.

Q13. Do you have any comments on airline policies on the need for accompanying persons for passengers who are not self-reliant?

98. The CAA received 53 responses for this question, with 20 respondents selecting 'No' on the CAA's consultation form without a further comment. The remaining 33 answers suggest that respondents had interpreted this question differently. Some took this as an opportunity to comment on current airline policies and some to comment further on the CAA's suggested criteria.

99. One airline respondent said that depending on business models some airlines may be able to offer discounts more easily than others and reiterated that clear guidance and definitions for safety assistants would have to be set.

100. A number of airlines said that they compete on products and services offered and, unless required by regulation, the CAA's framework should not influence whether airlines offer discounted fares or not.

101. Many consumers added that they have never been offered a discounted fare to travel with an accompanying person and that this information should be easy to find on airline websites.

102. One consumer and a consumer representative group also noted that discounts should not be limited to disabled persons with a physical disability but should also include people with non-visible disabilities.

Chapter 4

At the airport

Checking-in

Q14. Is the proposed criterion to achieve a 'Good' assessment level in relation to checking in appropriate? Should the CAA consider more criteria? If so, what criteria?

103. The CAA received 63 responses for this question with 35 respondents stating that the suggested assessment criterion was not appropriate. 26 respondents said that the criterion was appropriate and the remaining respondents added comments neither agreeing nor disagreeing.

104. Five respondents, which consisted of airlines, airports, and their representatives, stated that having separate check-in lanes is not always achievable as this is limited by an airport's infrastructure. Some airlines suggested that the CAA could make a distinction between an airline's hub airport and smaller operations at other airports. It was also noted that the CAA did not make a distinction between airlines that have a permanent presence in a terminal and those that have seasonal operations.

105. Several consumers and their representatives said that instead of having a separate check-in desk they would like all check-in desks to be made accessible and ease independent travel. A dedicated check-in desk could also result in longer queueing times than other desks if there is a high demand.

106. Airlines reiterated a similar point they made for previous questions, that creating a two-tier system and promoting dedicated check-in desks, fast track security, and so on could promote the misuse of this service by passengers who do not require assistance and effectively have a negative impact on consumers who do.

107. One airline respondent also asked the CAA to clarify the rating criteria and clearly say if it is referring to check-in facilities at UK airports or all airports as otherwise this may lead to confusion to consumers.

108. Several consumer respondents suggested, similarly to other questions, that airline staff should ensure that information gets confirmed at check-in and that this is passed on to the airport or service providers, to prevent passengers having to confirm their assistance requirements and information about their mobility aids and medical equipment several times.

109. A few aviation respondents said that it can be difficult for staff to find consumers that may need assistance, especially those with non-visible disabilities. Not all passengers with non-visible disabilities may wear sunflower lanyards. Two consumers and one consumer representative group made the same point, with some noting that not everyone may want to ask for assistance at check-in. Several respondents, including consumers and their representatives said that disability awareness training is important.

110. Some consumer respondents said that any paperwork given to consumers should be in an accessible format for passengers with non-visible disabilities, for example visually impaired passengers.

111. Three consumer respondents stated that often self-service desks are not accessible and suggested that the CAA should include this in their rating criteria. One charity added that this would align with the requirements under the Equality Act.

112. It was suggested that finding the check-in area and the assistance areas can be challenging, and that processes vary from airport to airport. Some suggested that having better signage, as well as hearing loops in place would be useful.

113. One consumer also noted that seating to the side of check-in queues should be supplied for consumers who cannot stand for long periods.

114. Respondents from several categories, including airlines, considered that passengers should be able to use their personal mobility equipment through the airport until the gate where possible.

Boarding and disembarking

Q15. Are the proposed criteria to achieve a 'Good' assessment level in relation to boarding and disembarking appropriate? Should the CAA consider more criteria? If so, what criteria?

115. The CAA received 63 responses to this question with 33 respondents being supportive of the suggested criteria, 24 respondents suggesting criteria were not sufficient, and the remaining respondents adding comments neither agreeing nor disagreeing with the proposed criteria.

116. Respondents said that there is confusion among industry over the roles and responsibilities of airports and airlines and welcomed the CAA's involvement to help drive improvements in this area. Several consumers and their representatives also answered this question by raising issues that fall within the airport's responsibility instead of the airline's responsibility, such as passengers being helped promptly upon landing at their destination airport.

117. One consumer advisory group stressed that this is a very important part of the passenger's journey and would recommend further research through stakeholders to establish 'Very Good' criteria. As boarding and disembarking requires a number of different operators, this needs careful consideration when establishing criteria.

118. Several respondents were supportive of the criterion for airlines to have procedures such as queue combing in place for passengers to pre-board. Respondents also said that long waiting times and queueing may be a barrier for disabled persons, stating the importance that a range of needs are met for the boarding and disembarking process.

119. In contrast several airline respondents stated that they do not support the CAA's suggestion for queue combing processes. They noted that implementing such a process would be challenging, particularly when there is only one agent responsible for the boarding process. In addition, a visual inspection by staff may result in consumers with non-visible disabilities being missed or staff approaching a consumer who does not wish to be helped.

120. Consumer respondents were generally supportive of the CAA's criterion for passengers to pre-board, but some requested clear definitions on what constitutes pre-boarding to be added to the framework. Some respondents said that airlines may not give passengers needing assistance enough time to pre-board before asking all other passengers to begin boarding.

121. A small number of consumer respondents suggested that disabled persons should also have the choice to board last. Depending on the passenger's needs boarding last may be their preference.

122. Consumer respondents also recommended improving signage at boarding gates to ensure all customers needing assistance could make themselves known. Other options mentioned were for airlines to use their mobile applications to notify passengers to come forward, as well as the use of sign language. Signage should go beyond wheelchair symbols to encourage passengers with non-visible disabilities to make themselves known.

123. Four respondents, which consisted of consumers and one charity, also called for standards to be set about the handling of mobility equipment. All passengers should be able to use their equipment up until the aircraft doors and receive it at the aircraft doors once they land at their destination. Consumers also called for fines if the equipment is wrongly taken to the baggage hall.

124. Some consumers and their representatives also called for innovation in this area and for people to be able to stay in their wheelchair onboard. This could be done by having the wheelchair tied down in the cabin, making their journey more comfortable and reducing the risk of their essential mobility equipment being damaged.

125. Airline representatives said that offering disabled persons to disembark first may cause operational challenges, since depending on the passenger's needs this may take a considerable amount of time. This can be particularly challenging on routes that have high numbers of disabled persons that will only request help upon arrival in the UK. If the cabin crew were to announce that passengers needing assistance can disembark first, this may trigger an even higher volume of consumers requesting assistance and result in passengers missing their onward connections.

126. An airport as well as a disability organisation also said that the way the cabin crew interacts with passengers during waiting times is crucial. Providing passengers with regular updates can have a positive impact on passengers and reduce anxiety.

127. One airport respondent mentioned that minimum connection times published by carriers do not currently reflect how long it takes for passengers to receive the assistance and proceed through the airport to the next flight, particularly if passengers may wish to use essential facilities between flights as the onboard facilities during their flight may not have been accessible. An airport respondent added that airlines should publish dedicated minimum connection times for passengers using the airport's assistance service.

128. It was noted by consumers and their representatives that connecting passengers should not be asked to wait until everyone has disembarked, to reduce the possibility of them missing their connection.

Chapter 5

During the Journey

Onboard facilities

General comments

129. In this section some respondents noted that the CAA did not include requirements about accessible inflight entertainment and safety briefings in their framework and recommended that the CAA should include this.

Seating

Q16. Are the proposed criteria to achieve a 'Good' and 'Very Good' assessment level in relation to seating appropriate? Should the CAA consider setting the standards at a different level (please explain your rationale)?

130. The CAA received 59 responses to this question with 33 respondents agreeing with the criteria set out in the framework. Of the remaining respondents, 23 disagreed with the criteria set out and three added comments neither agreeing nor disagreeing.

131. Many consumer respondents generally welcomed the CAA's criterion for passengers to have the opportunity to sit in an aisle seat. Nine respondents said that the seat selection should be the passenger's choice and not limited to aisle seats only.

132. Some airlines had concerns about the emergency evacuation of passengers seated in the aisle seats and suggested that 'safety concerns' within the framework should be clarified to avoid misinterpretation. Airlines also highlighted the commercial implications of removing a number of seats from public sale, as aircrafts often operate to capacity.

133. Six respondents, consisting of a charity, consumer representative groups and other industry stakeholders said that seat maps should include information about the facilities and amenities available, such as moveable armrests, legroom, accessible onboard facilities, and emergency exits. This information can help passengers decide which seats best meet their needs.

134. As in response to earlier questions, several respondents asked for clarity on what the CAA considers 'reasonable' and 'appropriate' within the rating criteria.

135. A small number of airline respondents noted that the 'Very Good' criteria may not be achievable for all airlines, as carriers may be limited by the configurations of the aircrafts in their fleet.

136. Several carriers and their representatives stated that they do not offer specialist equipment due to the diverse range of bespoke equipment. They instead allow consumers to use their own equipment.

137. Consumers and their representatives were supportive of the CAA's criteria, but some added that seating the accompanying person next to the disabled person should go beyond 'reasonable efforts', especially when carriers request that a consumer travels with an accompanying person. It was also proposed that the criteria for moveable armrests should be moved to the 'Good' category as it can have a profound impact on a passenger's experience.

138. One disability consultant said that business class seats have become more inaccessible due to walls and small doors to the seats and that this should be included in the CAA's framework.

139. Some consumers also considered that airlines should demonstrate that they are actively investing in the possibility for people to be able to remain in their own mobility equipment during the flight.

140. One consumer respondent also proposed that the CAA should include requirements for passengers with non-visible disabilities, such as being able to request seats in quieter areas of the plane or closer to the crew.

Access to toilets

Q17. Are the proposed criteria to achieve a 'Good' and 'Very Good' assessment level in relation to access to toilet facilities appropriate? Should the CAA consider setting the standards at a different level (please explain your rationale)?

141. The CAA received 57 responses to this question, with 27 respondents agreeing with the rating criteria and 5 respondents responding in a way that neither agreed nor disagreed with the CAA's suggested criteria. The remaining respondents disagreed with the proposed criteria.

142. Like earlier questions, two airlines and one airline group noted that meeting the suggested 'Very Good' rating category may be affected by the age as well as variety of the aircraft in service.

143. One airline stated that more consideration should be given to carriers with single aisle fleets who do not have spacious toilets as the design of the aircraft is not within their control. Two air carriers welcomed a definition in sizing and

requirements of what constitutes an accessible toilet and welcomed a European wide standard.

144. Industry stakeholders criticised the relevance of 60 or more seats, some adding that there are not suitable wheelchairs in the market to fit some small, older aircrafts in operation and that these often operate short routes (under 1-hour flights). Respondents said that this threshold should be reviewed, some stating that this should be changed to the ECAC guidelines which state 'new or refurbished aircraft'.

145. Nine consumers and their representatives commented that airlines should provide aisle chairs, with several respondents commenting that this should not be up to consumers to request as they may not be aware that they must request this. Some respondents suggested that airlines should ask consumers if this is needed during the booking process or ensure that this is made available for passengers that make a request for assistance.

146. Two consumer respondents urged the CAA to include passengers with non-visible disabilities in this category. Some consumers also added that there should be recognition of dignity in the framework as cabin crew can play a significant role for consumers by preparing the toilet (for example if two single toilets need to be connected to create one accessible toilet), as well as pointing out where things are located within the toilet facilities for visually impaired passengers.

147. One consumer suggested that the CAA add a rating criterion for toilet controls in standard consistent positions on new and refurbished aircraft. This standard has been achieved in the rail sector and would help visually impaired users.

148. Like earlier categories, consumers said that having information available on the accessibility of toilets before travel would be beneficial in deciding on their seating arrangements.

149. Some consumer respondents suggested the CAA remove the wording 'reasonable alternative' as they considered that this does not exist and that an accessible toilet on two aisle aircrafts should be under the 'Good' category. A consumer representative group also said that single-aisle aircrafts are being used for longer flights more regularly and that the CAA should revisit this category.

Storage of manual wheelchairs onboard

Q18. Is the proposed criterion to achieve a 'Very Good' assessment level in relation to the storage of manual wheelchairs onboard appropriate? Should the CAA consider more criteria? If so, what criteria?

150. The CAA received 52 responses to this question with 28 responding that the suggested criteria was appropriate. 19 respondents did not agree with the proposed criteria and five did not answer in a way that could be deemed as agreeing or disagreeing.

151. Two consumers and one consumer advisory group said that the criteria should include the storage of more than one piece of mobility equipment, for larger aircrafts. Some respondents added that the suggested rating criteria to supply storage for at least one vertically folding personal wheelchair should be labelled as 'Good' and not 'Very Good'. It was also noted that the CAA should not restrict this to only vertically foldable equipment and that hand luggage space should be prioritised for essential equipment.

152. In addition, respondents said that the CAA should clarify International Standard Organisation dimensions within the framework as these vary.

153. Airline respondents said that the rating criteria is only achievable by airlines who have the correct age and variety of aircraft in service. Certain aircraft may not have storage space for wheelchairs and other devices in overhead lockers. If the device fits the IATA cabin baggage dimensions this practice would be possible but that larger, heavier devices cannot be accommodated due to their size and weight as well as potentially Dangerous Goods limitations.

154. Some respondents appeared to interpret the rating criteria to mean that this would replace the transport of other assistive equipment on board, such as aisle chairs. These respondents suggested that having an aisle chair on board which suits different medical needs would be preferrable.

155. Three respondents suggested that the 'first come, first served' basis of the criteria should be reviewed, as it is not clear from the framework what the CAA means by this.

156. Respondents said that not being able to book this service ahead of travel and having to wait until boarding may add stress and anxiety for passengers.

Q19. Does the criterion adequately consider commercial considerations for airlines?

157. The CAA received 45 responses to this question with 33 respondents agreeing that the criterion adequately considered commercial considerations for airlines.

Of the remaining respondents 10 answered that it did not adequately consider commercial considerations and two added general comments that neither agreed nor disagreed. However, some respondents selected 'Yes' or 'No' on the online consultation form and added a comment saying that they were not entirely sure they understood the question correctly.

158. Points made by airline respondents were that cabin stowage is often confined to overhead compartments while other storage areas are often reserved for emergency equipment. When it comes to narrow body aircrafts, allocating more space for mobility equipment stowage would come at the expense of seats and galley space, which may lead to higher costs which in turn may affect ticket prices.

Carriage of mobility and medical equipment

Q20. Are the proposed criteria to achieve a 'Good' and 'Very Good' assessment level in relation to the carriage of mobility and medical equipment appropriate? Should the CAA consider setting the standards at a different level (please explain your rationale)?

159. The CAA received 53 responses for this question with 35 respondents stating that the assessment levels are appropriate. 15 respondents disagreed with the proposed criteria and the remaining respondents added comments neither agreeing nor disagreeing. Some of the respondents that agreed with the rating criteria suggested changes or additions to the assessment levels.

160. Two airlines did not agree with the rating criteria to return the mobility equipment to the aircraft doors, adding that it may not always be possible or safe to do this. An example provided was at gates operating with jet-bridges where ground handlers may have to carry the equipment up the external stairwell. This may be a health and safety risk for the ground handler, for heavier electric mobility aids. These respondents suggested that the CAA reword the rating criteria to take health and safety of agents into account.

161. Respondents also said that they would welcome the establishment of standards and guidance as to which types of medical equipment should be accepted free of charge.

162. Two airports said that although the Regulation sets out that airports are responsible for ground handling mobility equipment, this is rarely the case in practice. They added that airlines tend to contract directly with third-party ground handlers, or use their own ground handlers, and that airport staff do not have access to the aircraft hold. The two airports would welcome clarity on where their responsibility starts and ends. They would welcome the CAA reclassifying responsibility through this framework, stating that this may also be beneficial for consumers in case of damage to their equipment.

163. Consumer respondents stated that two pieces of equipment may not always be sufficient, and that the CAA may want to consider adding a higher number in the 'Very Good' category. Respondents encouraged the CAA to add clarity on what 'two pieces of mobility equipment' means, for example if crutches count as one or two pieces.

164. One consumer advisory group commented that there is a lack of consistency in policies surrounding oxygen and that charging for oxygen is an added cost based on disability. They added that if a passenger is denied oxygen this is equivalent to being denied boarding. They welcomed guidance on what consumers should do if an airline has reached the maximum oxygen capacity for a flight.

165. A disability organisation stated that they recommend adding a clear definition of postural needs and postural needs devices. This should be added to the rating criteria and distinguished from medical equipment.

Q21. Do the criteria adequately consider commercial considerations for airlines?

166. The CAA received 43 responses to this question with 34 respondents stating that the criteria adequately considered commercial considerations and the other respondents disagreeing.

167. Two airlines raised concerns over prioritising medical equipment and mobility equipment over luggage, stating that this may not be commercially viable. They added that high volumes of large mobility equipment, such as electric wheelchairs, can impact the volume of baggage carried significantly. This may be to a point where the flight is no longer commercially viable. This may also greatly increase the risk of damage occurring to the mobility aid due to the need to also load baggage in the same hold.

168. A disability organisation said that the CAA should add obligations for airlines to ensure that cabin crew handle any mobility equipment on board safely and only when given a legitimate reason to do so with permission from the disabled person.

169. One consumer advisory group added that the CAA could consider adding a distinction between electric mobility scooters and electric wheelchairs, as mobility scooters can also be rented abroad.

Q22. Do you agree that IATA's 'Guidance on the transport of mobility aids' provides an appropriate level of guidance on safe transport of mobility aids?

170. The CAA received 46 responses for this question with 33 respondents agreeing. The remaining respondents disagreed.

171. A small number of consumer respondents commented that the CAA's consultation document did not include the requirements set out in IATA's guidance and that these should be included.

172. A consumer advisory group said that IATA's guidance is comprehensive, practical and provides best practice. However, it primarily focuses on wheelchairs and scooters and the group considers that more research should be conducted, and more guidance included, because there has been a lot of innovation with new accessories and add-ons which change the landscape of what constitutes a 'mobility aid'.

173. Three consumer advisory and representative groups called for regular training of staff that handle mobility equipment.

174. An airport respondent added that they welcome more guidance on the handling of equipment as well as collaboration with manufacturers on ensuring 'new age' mobility equipment is suitable for air transport.

Onboard facilities in general

Q23. Over-arching onboard facilities question: Has the CAA correctly identified the current issues regarding onboard facilities? Are there additional issues which should be considered? Are the proposals practical and appropriate?

175. For this question, the CAA received comments from 29 stakeholders.

176. Some respondents interpreted this question to only relate to the carriage of mobility and medical equipment, rather than the whole section relating to onboard facilities.

177. Like the responses to other questions, three respondents stated that more training for personnel that handle mobility equipment is required to prevent damage of the equipment or refusal of carriage due to different battery types.

178. One airline respondent commented that dangerous goods restrictions have not been factored into the proposed framework sufficiently. Another airline respondent added that air carriers should be allowed to refuse or partially refuse the carriage of medical equipment if there is reasonable doubt that the equipment is essential to the consumer's wellbeing during the flight. These items should be accepted as checked baggage instead.

179. One airline respondent, and several consumers and their representatives, noted that there could be more detailed guidance for announcements on board. All announcements should be in an accessible format to ensure all passengers receive the same information. The accessibility of essential features such as

call buttons and light switches should be considered. On newer aircrafts these are often part of the inflight entertainment system.

180. It was also added that there is an industry-wide issue with accessible content on board and respondents would welcome industry wide pressure to distributors to improve the availability of accessible content.

181. One disability organisation suggested additional rating criteria based on postural equipment including ensuring that airlines have information based on their policy available on their website and ensure this is regularly updated and supply training on the use of this equipment.

182. One consumer representative group added that there should be a monitoring and evaluation process to evidence the percentage of equipment being refused or damaged.

Assistance dogs

General comments and reoccurring trends

183. The CAA received a high number of responses to this section, with some respondents supplying similar information for different questions. As part of the CAA's structured approach to the analysis of answers received, if one respondent made a point following one question that most other respondents made for a different question, the CAA added the answers up in the summary of responses for the question where most respondents made this point.

Q24. Do you agree with the definition of 'recognised assistance dog'?

184. The CAA received 69 responses to this question, with 44 respondents agreeing with the definition set out in the framework. 20 respondents disagreed with the definition and the remaining respondents did not answer in a way that could be deemed as agreeing or disagreeing.

185. Five respondents said that different competent authorities may have different and, in some cases, conflicting views on what constitutes a recognised assistance dog. Several respondents called for an internationally recognised definition.

186. Five respondents also said that the CAA's definition is inconsistent with the Department for Environment, Food and Rural Affairs' (Defra) definition and that the CAA should seek Defra's endorsement of the definition. Respondents considered that airlines may face prosecution upon landing in the UK if the assistance dog is not trained by the organisations set out by Defra.

187. Airline respondents also suggested that the CAA use the US definition:

"This final rule defines a service animal as a dog, regardless of breed or type, that is individually trained to do work or perform tasks for the benefit of a qualified individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability. It allows airlines to recognize emotional support animals as pets, rather than service animals, and allows airlines to limit the number of service animals that one passenger can bring onboard an aircraft to two service animals."

188. Six respondents wanted the CAA to include more information on how the training 'of the same or higher standard' can be shown, as this may help to prevent inconsistent application across different airlines. Some also said that a recognised standard certificate would be welcome.

189. Airlines and their representatives also urged the CAA to use language that makes it clear that no other animal besides trained and certified service dogs are considered in the provisions and guidelines. They also suggested that the framework should include the refusal of transport of a service dog, if the animal is not trained to support the person's disability and is posing a threat to a passenger's safety.

190. Consumers as well as assistance dog organisations said that there is currently no comprehensive professional development programme for assistance dog professionals. It is therefore difficult to prove the suitability of different training facilities.

Q25. Do you agree with the proposed documentation required to be accepted for travel?

191. The CAA received 63 responses to this question with 31 respondents agreeing, 27 disagreeing and five respondents adding comments that neither agreed nor disagreed.

192. 14 respondents, including airlines, aviation associations, consumers, and assistance dog organisations, raised concerns over the CAA's proposed documentation requirement. Some respondents were concerned about passengers completing a self-declaration form. Several respondents said that doctors are not qualified to certify that a dog provides the appropriate level or standard of support to meet the needs of a disabled person.

193. Several respondents also commented that an owner may have taught their dog to complete certain activities, but the dog may not have been put through the required behaviour training that would safeguard the dog and other passengers in a confined cabin.

194. Ten respondents stated that third parties should certify dogs. Many respondents stated that the minimum training standards should be limited to Assistance Dogs International (ADI), International Guide Dog Federation (IGDF),

Assistance Dogs UK (ADUK) and Assistance Dogs International Europe (ADEu). Assistance dog organisations also added that the wording of the framework should be changed to 'been trained by an accredited member organisation of (ADI) 'or' the (IGDF);' instead of 'and' as this may suggest to carriers that the dog should be certified by both organisations.

195. Generally, respondents would like more prescriptive guidance, a template to be used by passengers and one single common standard for consumers and carriers. Any guidance should include:

- the minimum amount of training hours
- a universal guide to testing assistance dogs to this minimum level
- other relevant criteria, such as behavioural tests to ensure the dog can work in public spaces.

196. Assistance dog training organisations commented that a dog may be in perpetual state of training without ever demonstrating that they are fully qualified to support their handler. This could lead to consumers claiming that their puppy or young dog is an assistance dog. Respondents added that dogs that are under a year of age do not qualify as assistance dogs due to their immaturity.

197. It was said by some respondents that various established organisations who are not members of ADI/ADEu/IGDF can certify a dog for its general conduct and behaviour in a public environment. However, this training and certification does not currently prove the dog's ability, willingness, and suitability to support the handler and their disability related needs, especially when flying. And that some organisations only conduct the examination of dogs but may not look at how long the training took place for. These organisations may only see the dog's behaviour on the day of the exam.

198. In contrast, other disability and consumer respondents said that airlines request too many documents, which can be difficult for consumers to supply, particularly visually impaired passengers. Respondents also questioned how detailed a confirmation of the tasks that the dog performs must be and what value this carries.

199. A few consumers and their representatives suggested training organisations that the CAA may wish to include in their guidance. They said that these offer a range of different assessments including the opportunity to train onboard an aircraft in a hanger.

Q26. Are there any other types of assistance dogs or other training standards that the CAA should consider adding to the list?

200. The CAA received 58 responses for this question with 33 respondents adding comments to this question.

201. 14 consumer respondents suggested additional types of assistance dogs to be added to the CAA's list:

- Buddy dogs for children are trained to help young disabled children, including non-visible disabilities
- Medical response dogs
- Anxiety dogs
- Multi-purpose or dual-purpose assistance dogs

202. Some consumer respondents added that the term 'psychiatric service dog' is primarily used in the United States and may carry outdated connotations or be seen as stigmatizing for some individuals with mental health conditions. The CAA may want to consider using more inclusive language.

203. Some airlines, some airline associations and an airport commented on the difficulty of correctly identifying a recognised assistance dog over an emotional support dog. An example mentioned was that the paperwork supplied may indicate to airline staff that the dog is a recognised assistance dog, however on further inspection, sometimes by the animal reception centre on the day of travel, it transpired that the dog is an emotional support dog and should not be accepted for travel inside the cabin.

204. With regards to training standards, airlines and their representatives suggested adding to the list that the dog should be desensitised to loud noises, sensational movements, and environments like an aircraft and airport.

205. The CAA should also consider referring to the welfare of the dog, such as the dog being able to relieve itself before the flight and during long flights, and to training to ensure it can do this in a sanitary manner. Respondents added that US DOT guidance states:

"On a flight segment scheduled to take 8 hours or more, you may, as a condition of permitting a service animal to travel in the cabin, require the passenger with a disability travelling with the service animal to confirm that the animal will not need to relieve itself on the flight, or that the animal can relieve itself in a way that does not create a health or sanitation issue on the flight by providing a current DOT Service Animal Relief Attestation Form."

206. Assistance dog organisations also raised concerns over the CAA's suggestion that minimum training standards have been met if a candidate organisation has

trained the assistance dog. Respondents stated that these organisations are working to meet accreditation but before assessment and accreditation by ADI or IGDF, the training provider may not be reaching the minimum training standards.

207. One assistance dog charity added that some countries legislate accreditation methods and that air carriers should accept these. They suggested that the CAA also includes assistance dogs trained by government authorised organisations within Europe.

Q27. Are the proposed criteria to achieve a 'Good' and assessment level in relation to assistance dogs appropriate? Should the CAA consider more criteria? If so, what criteria?

208. The CAA received 63 responses for this question with 31 agreeing that the suggested criteria is appropriate. Of the remaining respondents, 28 disagreed and four added comments on the rating criteria but neither agreed nor disagreed with the CAA's proposal.

209. Three airline respondents highlighted the negative financial impact that blocking off free seats ahead of travel may have on carriers. However, one respondent added that this can be accommodated if there is still space on the day and that the CAA's guidance should clarify that this is to supply more floorspace and that the dog should not occupy the seat.

210. Other airlines said that they already offer an extra seat, with one carrier adding that these are supplied for safety reasons, for example the floor space not being sufficient to accommodate the assistance dog and the dog otherwise blocking the aisle.

211. One airline association and one consumer also said that there is no explanation of what the safety requirements are, or what criteria airline inflight safety teams should use, to decide whether an assistance dog needs an additional seat to be kept free.

212. Respondents added that information relating to the carriage of assistance dogs should be available on airlines' websites. This should include information on how the assistance dog will be handled in the cabin and where the dog will be placed, as well as the safety rationale for doing so.

213. It was also noted that airlines should, upon request, provide the CAA with reporting of the number of assistance dogs carried and the number that were denied travel including reasons for denying travel. This will support the CAA in their work in identifying issues and drive continuous improvement.

214. Some respondents added that a free seat for the assistance dog should not only be offered due to safety reasons, but that the welfare of the dog and their

handler should be considered. One respondent added that a dog and their handler sharing the same seat space may affect them in the event of an emergency evacuation, as vacating the area quickly may not be easy.

Training

Q28. Do you agree that ECAC guidance is sufficiently extensive to help ensure adequate training? If not, what else should be included? Are there any examples of enhanced training programmes in other sectors that may be relevant to aviation?

215. The CAA received responses from 55 stakeholders for this question.

216. Respondents generally stated that ECAC guidance is a good baseline for training criteria and airlines should be looking to achieve this as minimum requirements.

217. 19 respondents suggested that the CAA could consider requiring additional training or provide examples of enhanced training programmes in other sectors, or both. Many respondents mentioned the Office of Rail and Road as an example of a sector with enhanced training programmes.

218. Many respondents, including airports, consumers, an airline, a consumer advisory group and a charity, mentioned the need for more in-depth training on non-visible disabilities, such as dementia awareness and autism awareness training, as well as training on how cabin crew should interact with partially sighted passengers.

219. It was also suggested by one respondent that the framework should include training on the importance of meeting postural needs. Another respondent mentioned that the training requirements set out in the framework should be extended to the handling of mobility equipment.

220. Six respondents, consisting of an airport, consumer representative groups, a consumer, and a disability consultant, said that consumers with lived experience should be involved in the design of training packages and should also review the content of these packages.

221. Air carriers also stated that they already have special assistance training programmes approved by other regulatory authorities, but which are not specific to the requirements set out under ECAC Doc 30. They added that it would be impractical to have training specific to multiple regulatory authorities unless these training programmes are aligned.

Q29. Is the proposed criterion to achieve a 'Good' assessment level in relation to training appropriate? Should the CAA consider more criteria? If so, what criteria?

222. The CAA received 51 responses for this question with 34 respondents agreeing to the criterion set out in the framework, 12 respondents disagreeing, and the remaining respondents not answering in a way that could be deemed as agreeing or disagreeing.

223. Several respondents, including airlines, commented on the duration and frequency of the training. One airline said that the requirements set out are excessive and may be difficult to achieve. Another carrier mentioned that the CAA should consider adding the contents of the training needed and timescales.

224. Disability respondents mentioned the importance of training being delivered by, or developed with, disabled persons and that training should be based on the social model of disability.

225. One consumer respondent added that training programmes should be published on airlines' websites.

Assistance during flight disruption

Q30. Is the proposed criterion to achieve a 'Good' assessment level in relation to assistance during flight disruption appropriate? Should the CAA consider more criteria? If so, what criteria?

226. The CAA received 52 responses for this question with 34 respondents stating that the proposed criterion is appropriate, 14 respondents not agreeing with the proposed criterion and 4 adding comments but neither agreeing nor disagreeing. All airlines and their representatives that responded to this question supported the suggested rating criteria.

227. One consumer representative group highlighted that acknowledging that disabled persons require more support during times of disruption is a positive step. They noted that that the current criterion should be expanded on, adding more details on how airlines should support passengers and what passengers can expect. This respondent also urged the CAA to have a 'Very Good' criterion.

228. One airline said that passengers would have to self-identify as requiring assistance and would have to have the relevant assistance code linked to their booking. Other airlines said that they already have processes in place to identify consumers that may require help.

229. Two respondents asked that the CAA clarifies within the framework what ‘prioritising’ entails. Examples mentioned were whether this means that passengers are brought to the front of the queue and put on the first flight or providing further assistance around the person’s needs (for example, accessible accommodation, food and a flight at a particular time if the person needs to rest).

230. One disability organisation also stressed the importance of clear communication with passengers throughout the disruption process.

231. It was suggested that the CAA should consider adding further criteria for mobility and medical equipment where these are already stored in the hold but may be required by the passenger during disruption.

232. One consumer stated that deaf passengers may not be able to hear instructions announced over speakers and that these should also be available on screens. Another consumer also said that instructions should be sent to mobile phones for visually impaired passengers.

233. One respondent urged the CAA to expand this criterion of the framework and assess airline compliance with the Regulation and Assimilated Regulation (EC) No 261/2004 by reviewing policies, procedures, and performance in such circumstances.

Chapter 6

Post Journey

Complaint handling

Q31. Are the proposed criteria to achieve a 'Good' and 'Very Good' assessment level in relation to complaint handling appropriate? Should the CAA consider setting the standards at a different level (please explain your rationale)?

234. The CAA received 55 responses to this question with 36 respondents agreeing that the proposed assessment level is appropriate. Of the remaining respondents, 16 disagreed with the proposed criteria and three added comments neither agreeing nor disagreeing.

235. Five airlines and their representatives responded that they did not support the CAA's proposed 'Very Good' rating criteria of being a member of a UK approved Alternative Dispute Resolution Scheme (ADR). One airline said that they would welcome a Europe wide standard, as airlines may have signed up to an ADR body in another country. One carrier said that adhering to the Passenger Advice and Complaints Team's decision, which is the CAA's inhouse complaints handling team, should be sufficient.

236. One airport and one charity added that they support the CAA's criterion for airlines to be a member of an ADR body.

237. Seven respondents suggested that the CAA include set times and targets in which airlines should respond to complaints.

238. Some consumers said that communications with passengers should be clear and that due to shared responsibilities of airlines and airports it can be difficult to know who passengers should complain to. The CAA should therefore consider including the quality of information available on complaint handling as a criterion.

239. Consumers and their representatives generally welcomed the CAA's position that airlines should have procedures for handling complaints and for the process to be accessible. Some respondents asked that the CAA clarifies what constitutes 'an accessible and appropriately resourced complaint handling process'.

240. Respondents also added that there should be a rating criterion that the complaints process is available in accessible formats.

241. Airport respondents pointed out that the CAA's airport framework (CAP1228) requires them to seek feedback on the assistance provided to disabled persons and submit this to the CAA. They said that this should also be the case for airlines, to ensure that the procedures set out by carriers are followed in practice.

242. One charity added that it would be useful for this section to include the role of the CAA as the designated complaint handling body and expectations on airlines where the CAA becomes involved.

243. One respondent added that the role of the Consumer Council for Northern Ireland (CCNI) should be included under the very good rating. The CCNI is the designated complaints handling body for the Civil Aviation (Access to Air Travel for Disabled Persons and Persons with Reduced Mobility) Regulations 2014 relating to an airport in Northern Ireland or a flight departing from a Northern Ireland airport.

Compensation for lost, delayed, and damaged mobility equipment

Q32. Are the proposed criteria to achieve a 'Good' assessment level in relation to delayed, lost, or damaged mobility equipment appropriate? Should the CAA consider more criteria? If so, what criteria?

244. The CAA received 53 responses to this question with 28 respondents agreeing with the proposed assessment level. 23 respondents disagreed with the proposed rating criteria and two respondents added comments that neither agreed nor disagreed with the rating criteria.

245. Seven respondents, including airlines, consumer representative groups, disability organisations and consultants did not agree with the use of special declaration forms.

246. Four respondents said that there is a cost associated to special declarations. One respondent added that the fee related to the special declaration process should be removed.

247. One of the concerns raised was the process being at risk of human error and devices being incorrectly valued. However, it was noted that this could be mitigated by passengers supplying a proof of purchase, although it was acknowledged that the purchase price may be significantly different to the current replacement cost.

248. As in other sections, respondents highlighted the importance of training for ground handlers on the handling of mobility equipment to prevent damage from

occurring. Respondents said that training should be co-produced with disabled persons.

249. Some consumers and their representatives considered that airlines should be required to compensate loss of earnings if the disabled person cannot be provided with equipment that allows them to return to work.

250. A disability organisation said that there is little in place to prevent damage happening in the first place. They added that the CAA should have enforcement powers to issue fines to airlines that damage or lose a disabled passenger's wheelchair or other mobility equipment.

251. Three consumer respondents raised concerns over rating airlines that provide reimbursement in line with the Montreal and Warsaw Conventions as 'Good'. They stated that only airlines going beyond the limit set out should receive a positive rating.

252. A disability consultant suggested that, to achieve a 'Very Good' rating, airlines should:

- compensate damaged mobility equipment in full (beyond the limit set out under the Montreal and Warsaw Conventions);
- provide financial support for repairs of mobility equipment; and
- support the passenger with reasonable adjustments after their wheelchair is damaged (for example pay for a taxi in case their wheelchair cannot roll anymore).

253. An airport respondent also suggested the addition of a 'Very Good' criterion for having processes in place to help passengers if their equipment is lost or damaged. These processes should include arranging accommodation, rental equipment, and repair of the equipment.

254. Several airlines said that they already reimburse consumers beyond the limits set out under the Montreal and Warsaw Conventions on a case-by-case basis.

255. An airline association suggested that it should be discussed (by airlines, airports, disability representatives and regulators) if all wheelchairs should be considered acceptable for travel in an aircraft hold. The ability to handle mobility equipment and prevent damage is dependent on various factors, including the information that passengers supply in advance. They added that few powered wheelchairs are designed with air travel in mind and lack instructions on how to correctly dismantle and reassemble them.

Q33. Do you have views on airlines reporting incidents of lost, delayed, and damaged mobility equipment?

256. The CAA received comments from 35 respondents for this question.

257. Some airlines responded saying that they hold this data already. Other airlines were not supportive of this suggestion saying that the additional work to report incidences would place an unnecessary burden on airline staff. One airline respondent questioned the benefit of reporting this and suggested that this data can be obtained through existing reporting channels.

258. An airport respondent commented that reporting this information to airport providers would aid them in improving the service and supply additional training where needed.

259. Consumers commented that it would be useful for this data to be published on an annual basis.

260. A disability organisation added that the need for this data to be reported should be set in regulation and should include the need for airlines to contact the affected person as early as possible. They added that the CAA should create their own policy and monitor airlines to ensure they are responding to and dealing with these complaints promptly.

Chapter 7

Definition of ratings and frequency of review

261. We received many comments on the criteria proposed for rating airlines as 'good' or 'very good' on the different subject areas and about the way assessments would be carried out, with views of stakeholders diverging significantly:

- Consumers, consumer focused organisations, charities and disability rights advocates often had concerns about whether the proposed framework went far enough to ensure the accessibility of aviation to disabled and less mobile passengers. Many commented that the 'Very Good' rating criteria could be expanded on.
- Conversely, airlines and aviation associations often had concerns that the proposals went above the requirements of existing regulations; whether they were proportionate and fair in their targeting of airlines (in particular by focusing on the top 20 airlines for the initial assessment); whether they adequately addressed the limitations of aircraft design and the age of the current airline fleet; and that they adequately addressed the issues caused by airlines operating in different international jurisdictions. There was also concern that airlines would receive a rating without an opportunity to address issues found and that this could be reputationally damaging.

Definition of ratings

Q34. Is the proposed method to calculate the Overall rating appropriate? Should the CAA consider an alternative approach?

262. The CAA received 54 responses for this question with 37 respondents agreeing with the proposed method to calculate the rating. 14 respondents disagreed with the proposed method and three respondents did not answer in a way that could be deemed as agreeing or disagreeing with the proposed approach.

263. Some respondents, including an airline, airline association, charity and consumer advisory group, suggested changes to the labels of the rating criteria as follows:

- Additional rating criterion called 'Sufficient' to make the gap between 'Good' and 'Poor' smaller.
- Additional rating criterion to prevent disincentivising airlines from improving called 'Working towards improvement'.

- ‘Needs improvement’ could be called ‘Average’ as the airline may have tried to follow the standards set out by the CAA.
- Remove the ‘Poor’ rating as it is a negative term and could have damaging commercial consequences.

264. Airlines and their representatives said that they may fall short of the CAA’s ‘Very Good’ standard although they fulfil all regulatory requirements. These concerns were also mentioned in earlier sections of consultation responses.

265. One airline suggested that airlines should also be considered on an individual basis with careful considerations for carriers that sit between the ‘Good’ and ‘Very Good’ category.

266. An airline representative quoted the UN Convention stating that this clarifies that accommodation should be reasonable: ‘necessary and appropriate modification and adjustments not imposing a disproportionate or undue burden, where needed in a particular case, to ensure to persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms’. The respondent said that for reasons of proportionality, accessibility requirements should only apply to the extent that they do not impose a disproportionate burden on the air carrier concerned. Or to the extent that they do not require a significant change in the products and services which would result in their fundamental alteration.

267. Airlines urged the CAA to undertake a Regulatory Impact Assessment to consider the costs to carriers to comply with the standards, as these could be substantial.

268. Airlines noted that airlines that meet the ‘Very Good’ category in most areas may not achieve a positive rating because they fall short in a single or small number of categories. It was noted that if the CAA were to provide weightings to different categories it may result in a very subjective judgement. Respondents urged the CAA to avoid this in their framework.

269. Airline representatives said that the CAA should follow their safety oversight model, in which regulatory oversight is focused on driving forward a strong safety culture, rather than publicly damaging an airline’s reputation.

270. Airlines and their representatives were further concerned over the requirement to go beyond regulation to achieve a ‘Very Good’ rating if not all airlines are covered in the CAA’s report.

271. One airline respondent also noted that the CAA did not set out their expectations in the following areas:

- a carrier’s fleet in comparison to leased aircraft

- short notice changes due to operational reasons.

272. An airport respondent noted that the ‘Very Good’ rating criteria needs strengthening as not all sections in the framework set out a ‘Very Good’ standard.

273. Another airport respondent said that as part of the 70% threshold, the CAA should name mandatory metrics that airlines must meet. Specifically, ones that have the biggest impact in upholding the rights of disabled persons.

274. Consumers and their representatives said that the rating criteria would be crucial to give passengers confidence when booking tickets.

275. Consumers said that the number of complaints an airline receives should be a factor in the rating criteria. This was because an airline may have processes in place, but staff may not follow them in practice.

276. Some respondents suggested that the rating criteria should be above 70%.

277. Three respondents said that the CAA should regularly review and update the framework to ensure the effectiveness of the rating system.

278. One respondent said that the framework refers to the first assessment and questioned if changing the performance indicators later would be beneficial. The respondent suggested that setting this out before it goes live will manage expectations and increase consistency.

Q35. Are the proposed criteria to achieve a ‘Needs Improvement’ and ‘Poor’ appropriate? Should the CAA consider an alternative approach?

279. The CAA received 48 responses for this question with 36 respondents agreeing with the proposed criteria. The remaining respondents disagreed.

280. A small number of respondents noted that the CAA did not define what constitutes a ‘reasonable timeframe’.

281. Consumer respondents noted that air carriers rated as ‘Needs improvement’ or ‘Poor’ should provide the CAA with evidence on how they will progress in meeting the CAA’s 'Good' standard within a reasonable time.

282. One group representing airlines suggested that ‘Poor’ is a negative label and could result in commercial damage to air carriers who may perform well in other categories. They added that ‘Needs improvement’ for airlines that do not meet the ‘Good’ category should be sufficient.

283. Consumer respondents also recommended mandatory legal undertakings or penalties for non-compliance where an airline is rated as ‘Poor’.

Frequency of review

Q36. Is the approach set out above about the frequency of reviews appropriate?

284. The CAA received 53 responses for this question with 30 respondents agreeing with the approach set out by the CAA. Of the remaining respondents, 18 disagreed with the suggested approach and five did not answer in a way that could be considered agreeing or disagreeing.

285. Airport respondents noted that an airline rated as 'Very Good' may be reviewed less often, while an airport with the same rating will still be assessed annually. Respondents suggested that if resource is a limiting factor, the CAA should spread the frequency of assessment fairly.

286. Airports also added that they should be able to provide the CAA with their views on the frequency of review for individual airlines. Airports work closely with airlines and may be able to identify operators that do not follow the standards set out in the framework.

287. Consumers and their representatives suggested that the CAA should look at the research from OFSTED or the NHS Trust. OFSTED does not re-assess schools that score highly for a period and that this can lead to standards dropping.

288. Three consumer respondents commented on the period for re-assessment where an airline has been 'Poor' or 'Needs improvement', suggesting that this timeframe must be specified.

289. Some airline respondents said that if an airline is marked down in one area and takes remedial action promptly, this may not be acknowledged by the CAA for a period, which posed a risk of reputational damage. The CAA's report should therefore reflect action taken by air carriers post-review to minimise reputational harm.

290. Airline associations as well as one airline respondent said that there was no reference to a process by which an airline could challenge a finding made by the CAA or request a further review.

291. Five respondents, consisting of airlines, their associations and one consumer, suggested that the number of airlines assessed is insufficient.

292. An airport respondent noted that the 20 largest airlines may not include the airlines with the most passengers requesting assistance. They suggested that the CAA should ensure that these airlines are captured within the first two years.

293. Many airlines and their representatives commented that, in focusing on the 20 largest airlines, the CAA's proposal unfairly targets a small number of airlines.

They expressed concern that other, smaller, airlines may be below the standards set out in the framework but would not be assessed. Respondents added that this is in violation of the fair and equal opportunity to compete guarantee enshrined in Air Transport Agreements, including the UK-EU Air Transport Agreement.

294. Many airline respondents reiterated that the implementation of a framework should be accompanied by a robust regulatory impact assessment. They urged the CAA to engage with stakeholders and to convene a high-level technical board to work on the operational challenges airlines face. This group would include the CAA and all relevant stakeholders, including disability stakeholders, and could be tasked with considering practical measures that can improve passenger travel. The board should also focus on long-term solutions, as the numbers of passengers with disabilities are set to increase in the future.

295. An airline respondent noted that if the CAA will take 2 years to publish their first report on 20 airlines, then the latest airline assessed will have longer to be compliant with the framework. This airline respondent also questioned how the CAA will ensure that the evidence gathered in this period is up to date.

296. Respondents suggested that results of assessments should only be published once all airlines have reviewed the CAA's results.

297. Airlines also added that carriers operating only recently manufactured widebody aircrafts will have a better chance at a high overall rating than an airline that operates a mixed fleet.

298. One airport respondent and one airport association suggested that airlines should be required to collect and submit basic data on an annual basis to help inform the CAA on which airlines it should prioritise for assessment.