

CAA Accessibility Assessment Report

London City Airport

June 2025

1. Background

- 1.1 The UK Civil Aviation Authority (CAA) is responsible for the enforcement of Assimilated Regulation (EU) No. 1107/2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air (“UK Regulation (EU) No. 1107/2006”). This applies to all flights from the UK and flights to the UK on UK and EU registered carriers. This legislation is intended to ensure that such people have the same opportunities for air travel as others, in particular that they have the same rights to free movement, freedom of choice and non-discrimination.
- 1.2 In respect of the obligations on airports set out in UK Regulation (EU) No. 1107/2006, CAA undertakes its oversight work under two workstreams:
- **Airports Accessibility Framework (CAP 1228):** a standardised method of assessing UK airports in the provision of assistance to those with accessibility needs. This framework sets out a rating approach to assess the provision of assistance by airports, which considers both legal obligations of airports (to ensure minimum standards are maintained) and best practice (to drive continuous improvement in the provision of assistance). The CAA publishes an annual report assessing UK airports against this framework every summer.
 - **Periodic “Deep Dive” accessibility assessments of individual airports across the UK.** These assessments review all aspects of the provision of assistance to disabled and less mobile passengers against airports obligations set out under UK Regulation (EU) No. 1107/2006 and all key guidance associated with this. The assessments look to identify examples of best practice to drive improvement across all UK airports, as well as

making observations and identifying findings of improvements that need to be made at the individual airport subject to the assessment.

- 1.3 To improve transparency in the provision of the assistance service at UK Airports and to enable widespread visibility of areas of good practice, the CAA will begin publishing all accessibility assessments where some or all elements of the assessments were conducted after 1 April 2024. It is intended that assessment reports will be published annually, alongside the publication of the Airport Accessibility Framework annual reports.
- 1.4 This report sets out the findings of the CAA's assessment of the accessibility of London City Airport.

2. Methodology

2.1 The CAA undertakes its assessment of airports with regard to the following regulations and guidance:

- Assimilated Regulation (EU) No. 1107/2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air (“UK Regulation (EU) No. 1107/2006”)
- CAP 2241 Interpretative guidelines on the application of UK Regulation (EU) No. 1107/2006 (“CAP2241”)
- ECAC Doc. 30 Part 5 and annexes 5-A-5-L (“ECAC Doc. 30”)
- CAP 1228 CAA guidance on quality standards (“CAP 1228”)
- CAP 1228A CAA guidance on data collection under CAP1228 (“CAP 1228A”)
- CAP 1411 CAA guidance on hidden disabilities (“CAP 1411”)
- Explanatory note on the CAA assessment of complaint handling
- CAP 2374 CAA guidance on assistance service at UK airports (“CAP 2374”)
- The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015 (as amended by) The Alternative Dispute Resolution for Consumer Disputes (Amendment) Regulations 2015 (“ADR Regulations”)
- Department for Transport (“DFT”) REAL Training: introduction and aviation modules (“DFT REAL Training”)

2.2 In order to undertake its assessment, the CAA seeks information from an airport in the form of a standard questionnaire. Following receipt of a response to this, the CAA will ask follow up questions and undertake site visits.

2.3 The table below sets out a timeline of the collection of information and site visits undertaken as part of the assessment for London City Airport.

Data type	Description of the data	When data was collected
Questionnaire response	Information on: <ul style="list-style-type: none">▪ airport structure,▪ charging,	September 2024

- airport assistance,
- designated points,
- seating,
- training,
- quality standards,
- hidden disabilities,
- personal mobility equipment,
- complaints handling,
- airport infrastructure

Questionnaire response	Survey of assistance service users	Information held by CAA
Questionnaire response	Physical and hidden disability training	September 2024 and March 2025
Questionnaire response	Protocol for assistance dogs	September 2024 and March 2025
Questionnaire response	Disability awareness training	September 2024 and March 2025
Questionnaire response	Assisted travel complaints and queries	September 2024
Online	London City Airport's website	December 2024
Site visit	Walk through of passenger journey	December 2024
Site visit	Check of facilities and equipment	December 2024

2.4 The full assessment of London City Airport can be found in the table below and a summary of the work undertaken in Annex A. The fieldwork was conducted by CAA in December 2024.

2.5 Where the CAA identifies an area of non-compliance with legislation or, in its view, guidance which should be followed to ensure compliance, a finding will be raised. Airports should ensure the CAA, and their access forums are kept up to date with findings and the actions they are taking to resolve these. Airport access forums should also be involved in any remedies implemented.

2.6 An observation is raised where the CAA identifies an area in which the airport should consider taking action to avoid future non-compliance with legislation or associated guidance. We expect airport to take this advice seriously and act on it appropriately. They should also consult their access forums or disability organisations to decide their appropriate next steps. The CAA may request

information on actions taken. Observations will usually be raised when guidance is not being followed, when more information is required by the CAA, or when it is anticipated that the airport, although currently in compliance, might not remain so unless appropriate action is taken.

3. Summary of key findings and observations

3.1 A summary of the findings and observations can be found in the table below:

Category	Area	Issue level	Comments
Designated points	Signage	Observation	<p>In ECAC Doc. 30 Section 5.3.7, facilities which are for disabled and less mobile passengers should be appropriately signposted.</p> <p>The signs at London City Airport for assistance areas are not clearly visible. The landside terminal seating area is hidden in the corner and can be hard to locate as you enter the terminal. Overhead signage directing to this area is small.</p>
Airport assistance	Assistance dog relief areas and signage	Observation	<p>To meet UK Regulation (EU) No. 1107/2006 Annex 1 and ECAC Doc 30 Section 5.14, airports are expected to provide suitable dog relief areas for assistance dogs. While London City Airport does provide both a landside and airside dog relief area, there are concerns regarding visibility and usability for passengers with assistance dogs.</p> <p>The airside relief area is located near Gate 21, in an unused hangar and the space is not purpose-built. In the United Kingdom, there are no specific national regulations detailing the requirements for assistance dog relief areas at airports, but suggest using best practice guidance where available. The London City Airport airside dog relief area lacks soft surface materials, clear signage, and cleanliness amenities such as waste bins.</p> <p>ECAC Doc. 30 Section 5.13.7 states that installations which are designated for disabled and less mobile passengers should be appropriately signposted. During a site visit, it was noted that there is no signage or wayfinding for the airside dog relief area. There is a leaflet on the landside check-in desk and departure seating area that explains the need to be escorted to this area, but this should perhaps supplement signage. London City Airport explained that the airside assistance dog relief area is currently not signposted due to the need for the passenger to be escorted to the area.</p>

Quality standards	Consultation with disabled stakeholders on designated points	Finding	<p>Across Regulation (EU) No. 1107/2006 and ECAC Doc. 30 the importance of consulting with airport users and access forums representing disabled and less mobile passengers is a recurring principle to ensure services are inclusive and reflect user needs.</p> <p>Article 5.1 of Regulation 1107/2006 requires designated points of arrival and departure to be designed in cooperation with airport users. However, the location of designated points was determined without engagement from the access forum. The airport cited restricted space and security requirements as the rationale, noting the points were selected based on operational constraints. The regulation encourages collaborative input to ensure usability and appropriateness of these locations</p>
Designated points	Call point signage	Observation	<p>ECAC Doc. 30 section 5.13 says that signage Installations that are reserved or designed for disabled and less mobile passengers should be appropriately signed. Annex 5-K and international design standards ISO 3864-1:2011 recommends harmonisation in the signage used for call points designated for passengers requiring assistance. This includes marking call points as 'Call Point for Assistance' and defines identification colours and signage for public spaces.</p> <p>At London City Airport, the designated call point at the car park is a red square, labelled 'emergency phone'. This design does not follow ECAC or ISO signage guidance for assistance call points. It is not clearly identifiable as a designated help point for disabled and less mobile passengers and may be misunderstood as an emergency device and this may deter use.</p>
CAP 2374 – independent journeys	Signage on walking distance	Observation	<p>According to CAP 2374, airports should review the accessibility information provided to passengers, ensuring it is clear and enables informed decision-making. ECAC Doc 30. Annex 5-J states that airport should provide a map of the airport and list the key walking distances between key points in the passenger journey, such as designated points, accessible toilets, security, departure lounge, border control and baggage reclaim.</p> <p>The designated assistance points at London City Airport provides information about the current stage of the journey (e.g., 'You are now at check-in'). However, no other information is provided. London City does</p>

provide a leaflet at the information desk and departure seating area which includes some walking distances to gates but not to assistance areas or key points.

CAP 2374 - Promoting independent journeys	Equipment for independent journeys signage	Observation	<p>CAP 2374 recommends that airports should ensure passengers are made aware that assistance through the airport can be provided by friends or family, if this is the preferred option of the individual. Airports are encouraged to communicate this option to passengers, provide available wheelchairs, and ensure staff are trained to discuss these preferences appropriately.</p> <p>During the recent site visit, it was confirmed that wheelchairs are available in the landside seating area that can be used by family or friends to support passenger self-mobilisation. However, there are no signs informing passengers that this option is available, but it is mentioned in the information leaflet on the information desk. In addition, training materials do not instruct agents on how to raise this option in discussions with passengers, potentially leading to missed opportunities for more personalised assistance.</p>
Website	Information on mobility equipment	Observation	<p>According to ECAC Doc. 30 Annex 5-J, airport websites must include clear, minimum information for passengers travelling with their own mobility aids.</p> <p>This includes the arrangements in place should a passenger's mobility equipment be damaged or lost upon arrival. However, information regarding arrangements for repatriating mobility equipment to the passenger on arrival and the arrangements for obtaining replacement mobility equipment if the passenger's own is damaged or lost on arrival could not be found on London City's Airport website. The guidance available advises passengers to notify their airline if equipment is lost or damaged, which does not fulfil the requirement to outline the airport's procedures for addressing lost or damaged mobility equipment. The websites FAQ section contains confirmation that passengers may remain in their own wheelchair up to the aircraft door, but this is not easily discoverable from the airport's main Assisted Travel page.</p>
Website	Information on airport security	Observation	<p>ECAC Doc. 30 Annex 5-J recommends that airport websites provide clear and comprehensive information on security arrangements. The Assisted Travel main page offers limited information about the security process and on the specific arrangements for disabled passengers in security, in relation to medical</p>

equipment and mobility. For example, there is no dedicated guidance for individuals travelling with wearable medical devices, colostomy bags, or other sensitive medical items. London City Airport's 'Need to Know' page does contain supportive information, including an email contact for passengers requiring advanced advice or tailored support through security. However, this page is not directly linked from the Assisted Travel section, making this information less visible to those who may need it most.

Website	Information on assistance dogs	Observation	ECAC Doc. 30 Annex 5-J recommends that airport websites provide clear information about the arrangements in place at the airport for assistance dogs, including information about the location of relief areas. London City Airport's Assisted Travel main page has a link to a dedicated assistance dog separate page. This page does not mention the airside animal relief area. AccessAble does not provide much further information on assistance dogs, and where the dog relief areas are.
Website	Information/layout	Observation	<p>ECAC Doc. 30 Annex 5-J Section 1.1 states that information should be presented on a single web page or be accessible from a single landing page. This is intended to ensure that passengers can easily locate all relevant assistance information.</p> <p>London City Airport's accessibility information is distributed across several separate pages, including the main Assisted Travel page, a dedicated assistance dogs page, a security information page, and a FAQ section. However, these pages are not always linked, which reduces navigability and may result in passengers missing important guidance. In addition, the content across these various pages does not appear to be maintained to the same standard. This is evidenced in the FAQ section, where the most recent minutes for the Assisted Travel Forum are from 2021.</p>
Website	Title and imaging	Observation	The requirements set out in ECAC Doc. 30 Annex 5-J Section 1.2 suggest international standard images for disability signage. There is a wheelchair symbol used at the bottom of the drop down next to 'Assisted Travel' but not next to Assisted Travel on the drop down under 'at the airport' or at the bottom of the page. There is inconsistency in signage.

Training	Training for London City Airport staff	Observation	<p>The DfT REAL Training Programme Manual for Trainers (Section 5) mentions that testing and assessment of disability awareness training should be undertaken through classroom-based activities, oral and written exercises, or a formal written test conducted under exam conditions.</p> <p>At the time the accessibility questionnaire was conducted, London City Airport's security training and compliance team had not implemented an exam as part of their delivery of Module One.</p> <p><u>Updated-</u> As of October 2024, London City Airport implemented a written exam for all staff undertaking the training. This is in progress for the teams.</p>
Training	Training Module One	Finding	<p>Regulation (EC) 1107/2006 article 11 and ECAC Doc.30 emphasise the need for all airport personnel who deal directly with the travelling public should be trained to be made aware of and, where appropriate, be able to meet the needs of disabled and less mobile passengers.</p> <p>Information provided by London City Airport in October 2024 showed that not all airport staff had received the full Module One training but London City indicated that this would be addressed by the end of 2024.</p> <p>This has not been fully achieved.</p> <ul style="list-style-type: none"> Customer facing airport staff, catering and retail, and airport management had all not completed the legislation and guidance, physical disability awareness, and hidden disability awareness training. This was still the case by April 2025. All check-in agents had not received hidden disability awareness training, but this is now in progress. Check-in agents have not completed an exam for Module One. All airside and landside drivers had no Module One training, but they all did by April 2025.
Training	Training content	Observation	<p>In accordance with ECAC Doc 30 and the Department for Transport's REAL Disability Equality Training Programme Manual, which outline the content and delivery for staff training, a review of London City Airport's training material has identified several areas for potential improvement.</p>

- Assistance dog relief areas: The current training slides do not appear to include information regarding the location and availability of airside and landside dog relief areas.
- Visual updates: Some of the photographs within the training slides, particularly those showing the assisted travel areas (both landside and airside), require updating to ensure that staff are familiar with the current facilities and can clearly identify these areas.
- Language and terminology: Certain language and phrasing used within the training materials could be improved. The Assisted Travel Advisory Group could review the training content to ensure that the language is appropriate.
- Security screening procedures: CAP1141 highlights that, during security screening, individuals with hidden disabilities should never be separated from their accompanying persons. This is not addressed within the security training materials.
- The DfT training manual advocates for the social model of disability as the foundational approach for training delivery, aiming to shift perceptions to remove obstacles that hinder disabled individuals' participation in society. This approach views disability as a result of societal barriers rather than individual impairments. However, the training provided has more of a focus on different passenger impairments and disabilities.

4. Examples of best practice

- 4.1 Through airport accessibility assessments of UK airports, the CAA seeks to identify best practice at airports in their assistance service processes, equipment, and infrastructure. Publication of these reports will help share best practice between airports, airlines, service providers and passengers.
- 4.2 The following areas of best practice have been identified as part of our assessment of best practice have been identified as part of our assessment of London City Airport.

Parking

- 4.3 London City Airport offers accessible parking provisions for disabled passengers. Blue badge holders are permitted to drop off passengers free directly outside the terminal. The drop-off includes a designated call point, two accessible parking bays with plenty of space and is constantly manned by a member of staff.
- 4.4 Blue badge holders are entitled to 30 minutes of free parking in the terminal car park, facilitating greater flexibility for those needing this extra preparation time. The car park includes a designated call point and multiple accessible parking bays.

Contacting assisted travel team

- 4.5 ECAC Doc. 30 Section 2.8.5.1 states that arrangements must be in place for disabled and less mobile passengers to communicate their arrival and request assistance from inside and outside of terminal buildings. In line with this, London City Airport offers multiple channels for disabled persons and passengers with reduced mobility to notify their arrival and request assistance, including phone, WhatsApp, and call points at outside designated areas. This multi-channel approach provides passengers with choice and flexibility, supporting different communication needs. The contact number is also displayed on the airport website.
- 4.6 During the site visit, the outside designated call points were tested and were answered quickly, politely and professionally. In addition, audit records for call

points and the hearing loop at the check-in desk functionality were promptly provided for a sample week in February and showed compliance. Airport staff were observed conducting routine checks of these systems during the visit in December.

- 4.7 The airport provides a smiley face feedback system with a traffic light system (red/amber/green) in the airside departure lounge and Thea landside seating areas. If a passenger presses the red face twice within 90 seconds, an alert is triggered. This prompts an agent to be dispatched to attend to the passenger and provide any necessary assistance. This system enables real-time feedback and ensures a swift response, helping London City Airport to proactively support passengers and enhance the overall service experience.

Information for disabled and less mobile passengers

- 4.8 CAP 2374 sets out the CAA's view on airports providing more information on the layouts of their airports to help improve information to passengers, so they are in a better position to decide about their assistance needs. This might be done through mapping passenger journeys and including information on facilities and infrastructure of particular importance to disabled and less mobile passengers, for example, seating, lifts, and ramps. London City Airport has partnered with AccessAble to provide a comprehensive online accessibility guide, information in accessible formats (web and mobile), and details on seating, ramps, lifts, and other key facilities. This guide is linked on the website, allowing passengers to make informed decisions about the support they may need.

Designated Seating

- 4.9 During the site visit, designated seating was checked at key locations throughout the passenger journey, including the landside waiting area. This area is signposted as a seating area for disabled and less mobile passengers. However, due to its proximity to a café, there is frequent overflow by general passengers into this space. Staff were observed managing the space appropriately by politely redirecting general passengers away from the area when needed, helping to preserve the space for those it is intended for.

Annex A – Summary of works undertaken

Area	Topics Covered	Work performed
1. Pre visit questionnaire and attachments	<ul style="list-style-type: none"> ▪ Airport structure, ▪ Charging, ▪ Airport assistance, ▪ Designated points, ▪ Seating, ▪ Training, ▪ Quality standards, ▪ Hidden disabilities, ▪ Personal mobility equipment, ▪ Complaints handling, ▪ Airport infrastructure. 	<p>Questionnaire was completed by the London City Airport team. The questionnaire was reviewed by the CAA before the site visit.</p> <p>Interviewed:</p> <ul style="list-style-type: none"> ▪ Reviewed answers and provided more detail and explanation where required.
2. Walk through of passenger journey and checks of equipment	<ul style="list-style-type: none"> ▪ Designated points, ▪ Seating, ▪ Hidden disabilities, ▪ Airport infrastructure ▪ Seating ▪ Signage 	<p>CAA:</p> <ul style="list-style-type: none"> ▪ Checked useability and serviceability of designated points. ▪ Check access points to the airport e.g., car parks, ▪ Checked for equipment levels e.g., wheelchairs available for self-mobilisation. ▪ Observed signage in landside and airside areas. ▪ Checked seating and other facilities designed for disabled and less mobile passengers.
3. Airport tour	<ul style="list-style-type: none"> ▪ Airport infrastructure ▪ Quality standards ▪ Hidden disabilities ▪ Independent travel ▪ Airport equipment 	<p>Interviews were conducted with representatives of London City Airport.</p> <ul style="list-style-type: none"> ▪ Further explanation of processes and policies. ▪ Explanation of facilities and future development plans.
4. Compliance Review	Website review	Desk top review conducted by the CAA.

Area	Topics Covered	Work performed
		Reviewed London City Airport's website in line with guidance on website in ECAC Doc. 30 Annex 5-J.