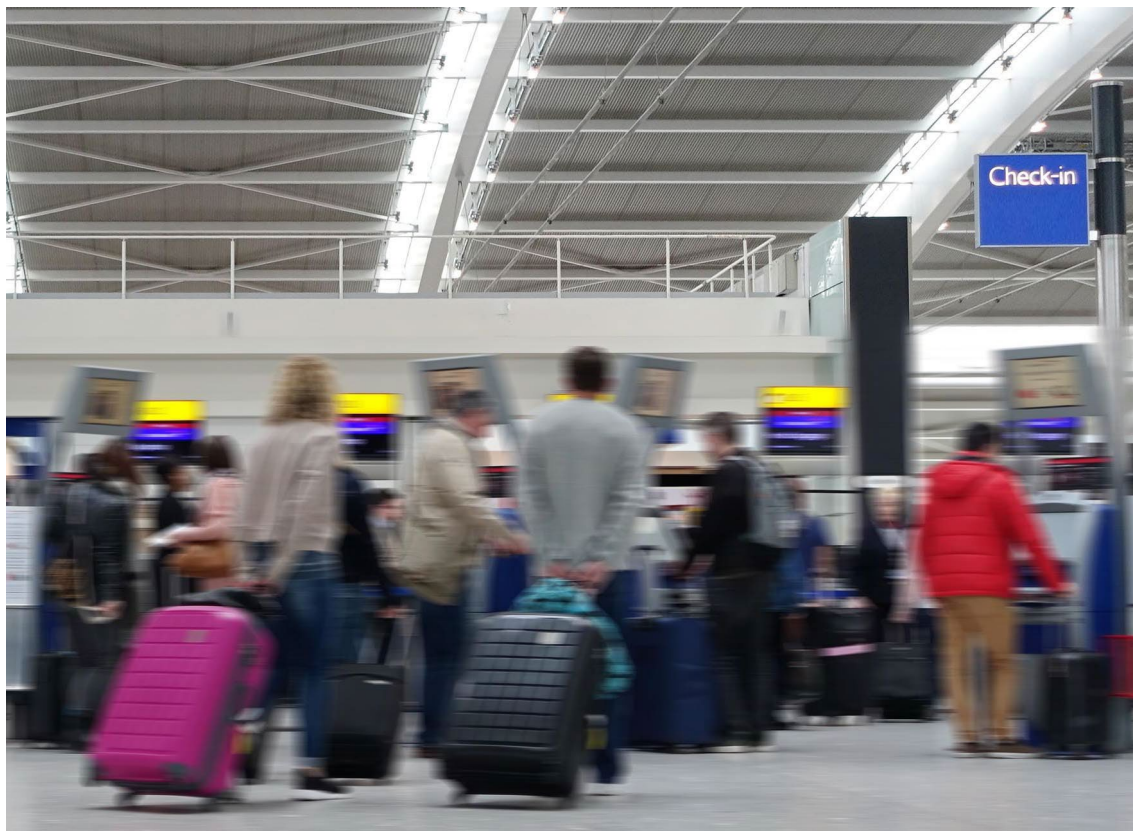


CAA Consumer Panel

Annual Report for the year ended 31 March 2025



Contents

Contents	2
About the CAA Consumer Panel	3
Who we are	3
What we do	3
Our remit	3
Chair's Foreword	4
Chapter 1	7
How we work	7
Our aims	7
How we prioritise our work	7
Chapter 2	8
Understanding our impact	8
Building the evidence base	9
Driving better outcomes for consumers	12
Influencing future frameworks	18
Priorities for 2025 - 2026	19
Chapter 3	21
Transparency	21
Expenditure	21
Panel meetings	21
Terms of Reference	21
Working with stakeholders	21
Chapter 4	22
Panel members and secretariat	22
Chair	22
Members	22
Secretariat	25

About the CAA Consumer Panel

Who we are

The CAA Consumer Panel is a small group of independent experts, who bring together deep consumer expertise and experience along with strategic thinking, applying this in a practical way to improve the aviation experience for consumers. Panel members' biographies can be found at the end of this document.

What we do

We act as a non-statutory critical friend, giving expert advice to the CAA as policy is being developed, and making sure the consumer interest is central. Our objective is to champion the interests of consumers.

Our key activities are to:

- Help the CAA to understand fully, and take account of, the interests of consumers in its policy development and decisions.
- Use existing CAA research, request the CAA undertakes new targeted research, and gather intelligence, in order to understand the aviation consumer experience.
- Provide the CAA with feedback from a consumer perspective on the effectiveness of its policies and practices.

Our remit

We focus on the interests of current and potential aviation consumers. Citizen or community issues, such as noise from flightpaths, do not fall under our remit.

Chair's Foreword

Over this reporting year, we continued to deliver on our 2022-2024 work programme which focused on driving the industry's recovery, rebuilding consumer confidence and improving services following a few turbulent years in the aviation sector. Following a successful strategy day in summer 2024, we published our new work programme covering November 2024 to November 2026, which focuses on navigating the new 'post-pandemic' aviation landscape.

Since the July 2024 General Election, we have seen a period of significant strategic and regulatory change shaping the 'post-pandemic' aviation landscape. This new landscape has provided the strategic backdrop against which we have been progressing our work over this reporting year. Change includes:

- The new Government's mission to drive UK economic growth to protect consumers, support competition and drive investment and innovation through an Action Plan to overhaul the regulatory system; a series of 'regulator pledges'; and potential airport expansion. The new Secretary of State for Transport has also set out five priorities for the CAA to progress and report against in 2025/26: (i) growth and innovation; (ii) airspace modernisation; (iii) the decarbonisation of aviation; (iv) modernising the CAA's consumer focus to put consumers first; and finally (v) efficiency, effectiveness and resilience.
- At the same time, the CAA has enhanced its consumer focus and capabilities through additional funding and resources in areas including Consumer Protection and Economic Regulation as recently set out in its 2025/26 Scheme of Charges. The Digital Markets, Competition and Consumers (DMCC) Act 2024 has also come into force, giving the CAA access to new – albeit still limited – powers when enforcing consumer law. In addition, the Competition and Markets Authority has also recommended that Government considers widening the CAA's competition jurisdiction to align with its regulatory responsibilities.

We welcome this increased consumer focus and investment which presents an opportunity for the CAA to have even more impact in improving consumer outcomes. We are particularly pleased to see the CAA's Consumer Protection capability being treated as a priority area, including the CAA's planned work around a new consumer rights compliance programme and airline accessibility performance framework, which we strongly support. We also welcome the legislative reform noted above and have continued to work with the CAA in making best use of its existing powers, but continue to strongly advocate our long-held position for the CAA to be given direct powers to enforce consumer rights akin to other regulators which we understand Government is considering.

Over this reporting year, we have also seen a significant change in the latest wave of the Aviation Consumer Survey, with overall consumer satisfaction rising to its highest level since 2019 and consumers flying in their highest numbers since 2016. While we still have concerns around specific areas of consumer satisfaction as set out below, we broadly welcome this as a sign of growing consumer confidence, particularly as rising dissatisfaction was an area of concern we highlighted in our new work programme. At the same time, we are also mindful of not placing too much weight on a single wave of the Survey and will look with interest towards future waves to see if a longer-term trend of increasing satisfaction materialises.

Taken together, these changes generally suggest a somewhat improved outlook for aviation consumers compared to previous post-pandemic years, which is encouraging. That said, there are still a number of challenges and issues impacting consumers that need to be explored and addressed:

- i. **Understanding the drivers behind the improvement in overall satisfaction** which appears to be likely driven by improvements in complaint handling. While we welcome this increase, satisfaction with complaint handling remains significantly lower than other parts of the consumer journey. There also remains a large, albeit narrowed, gap in satisfaction between disabled and non-disabled consumers. It will also be important to explore other areas of dissatisfaction, such as value for money which still lags significantly behind pre-pandemic levels, particularly for disabled and digitally excluded consumers, as well as other issues including the continued increase in demand for special assistance services.
- ii. **The interactions and difficult trade-offs between competing aviation policy objectives**, as illustrated in the five priorities set out above, particularly in respect of the Government's focus on growth and decarbonisation (including the Government's new Sustainable Aviation Fuel measures). As we set out in our new work programme, it will be important to consider how such trade-offs can be made in a fair and equitable way, and to shine a light on the real human impact future policies in this area could have.
- iii. **Ensuring a resilient sector** that implements the recommendations from the Final Report of the Independent Review of the NATS (En Route) failure in 2023 and any relevant recommendations from Yonder's research, noted below, on airline communication with consumers during disruption, and also learns lessons from recent disruptive events including recent power outages that caused significant consumer detriment.
- iv. While we strongly support the focus and investment in the CAA's Consumer Protection capabilities noted above, we consider there could be additional benefits to the CAA **further embedding the consumer interest in other policy areas**. This is in the context of the rapid pace of change in the sector, including the CAA's recent appointment as Market Surveillance Authority for drones; the launch of the

CAA's roadmap to enable routine drone flights Beyond Visual Line of Sight (BVLOS) and new drone regulations and trials; the CAA's new AI Strategy; the Law Commission's work on aviation autonomy and the launch of the UK Airspace Design Service. We feel that developing a better understanding of how the consumer interest feeds into these and other areas, through tools including the Consumer Principles and the Consumer Vulnerability toolkit, could help future-proof policy and make it more consumer focused, robust and evidence based.

Over this year, we are pleased to have provided support, advice and guidance to progress several areas of work across the CAA, providing our expert opinion in response to emerging issues as well as consultative work and engagement with the CAA, Government and independent bodies. This includes inputting to the Final Report of the Independent Review of the NATS (En Route) failure in 2023 and implementation of recommendations, as well as various strands of work including innovation; accessibility and consumer vulnerability; environmental sustainability; and economic regulation. We have also provided input on the CAA's new ATOL Claims Portal and customer experience work, as well as the Aviation Accessibility Task and Finish Group on which a Panel Member sits. Overall, we feel we have had particular impact in the areas of innovation, and accessibility and consumer vulnerability, and are pleased that the Panel's visibility across the CAA continues to grow with the launch of our new intranet page.

The terms of two Panel members sadly ended in March 2025. I would like to take this opportunity to thank Carol Brennan and Helen Dolphin for their valuable contributions to the Panel since 2018. I am also delighted to welcome our new members, Professor Chris Gill and Deborah Persaud, who bring new perspectives and areas of expertise to the Panel. We have also seen senior staff changes at the CAA, with a new Group Director of the Consumers and Markets Group, Selina Chadha, and the appointment of two new Non-Executive Directors to the CAA Board, including Trisha McAuley OBE, who is a former member of the Consumer Panel.

Over the next year, we look forward to further deepening our relationship with the CAA Board, as recommended by the Public Bodies Review, and continuing to work with the CAA, Government and industry stakeholders to ensure consumers' needs remain at the heart of decision-making in the ever changing and ever challenging aviation sector.



The Right Hon Jenny Willott OBE
CAA Consumer Panel Chair

Chapter 1

How we work

Our aims

The Panel exists to ensure the consumer interest is placed at the heart of the CAA's work, helping it uphold consumer choice, value and fair treatment and improve consumer protection outcomes. We want to see markets and regulation that focus on the clear interests of existing and future aviation consumers, and that work well to ensure effective airline competition on price and service quality. Airports should provide affordable, good quality and consumer-focused service; empowered consumers should be able to make informed decisions about which companies to use; airline services and airport environments should be designed and delivered to ensure accessibility to everyone, and people who may need extra help should be supported to make sure they can effectively access the market. And finally, when things go wrong, consumers should have quick, fair and easy access to redress.

How we prioritise our work

The Panel is a small, specialist policy resource for the CAA and delivers high quality, evidence-based advice in a way which is designed to maximise its impact. The Panel therefore prioritises its work carefully, asking five key questions before embarking on any given project:

- Is the issue important for aviation consumers?
- Does it fall within the Panel's remit?
- Is it an area where the CAA is best placed to effect change?
- Is it (or should it be) a priority for the CAA?
- Is it an area where the consumer voice is less understood or not represented which could benefit from additional focus?

The Panel will also prioritise the interests of consumers it considers to be at greater risk of vulnerability throughout its work.

Chapter 2

Understanding our impact

This report covers the year to 31 March 2025. Over this period, we continued to deliver on our 2022-2024 work programme and the first few months of our new November 2024 – November 2026 work programme, based on the themes: building the evidence base; driving better outcomes for consumers; and influencing future frameworks.

As set out above, the overarching focus of our new work programme is on navigating the new 'post-pandemic' aviation landscape. As part of this, we intend to explore the following themes:

- Reversing the steady decline and improving consumer satisfaction with their overall travel experience, particularly in respect of delay and poor customer service, and regional dissatisfaction in Northern Ireland and Scotland.
- Improving consumer education, confidence and trust in respect of passenger rights and redress, sustainability and innovation, through the provision of information and consumer engagement and research.
- Continuing to focus on accessibility to ensure broad and diverse consumer participation in the market, and considering how to mitigate the potential risks of exclusionary effects from wider economic, technological and regulatory changes so that those who want to travel can continue to do so.
- Start considering with the CAA and others, the interactions and trade-offs between competing aviation policy objectives relating to the delivery of a growing, thriving and competitive aviation sector and the benefits this brings to consumers and the wider economy, alongside meeting sustainability goals including those related to climate change, which is one of the biggest challenges facing the aviation sector. As part of this, it will be important to consider how such trade-offs can be made in a fair and equitable way, and to shine a light on the real human impact future policies in this area could have.

Below we set out the work we have undertaken over the year against our work programmes and in response to new developments, along with our plans for the year to come.

We have a number of important relationships with a range of stakeholders. As well as the CAA, these include industry representative bodies, other regulatory consumer panels, consumer organisations, and third sector bodies. As a small policy advisory body embedded within the CAA, these relationships allow us to work collaboratively and

maximise our influence with decision makers. The stakeholders we met over the course of the year are listed in Chapter 3.

Building the evidence base

In order to develop policy that reflects consumers' priorities and needs, and is correctly targeted, a strong evidence base is key. Our new work programme committed us to continue inputting to the design of the Aviation Consumer Survey¹ (the Survey) as our primary source of evidence on the consumer experience, and other relevant consumer research that is commissioned by the CAA. We have also expanded our evidence base to draw on other relevant insights to compare and contrast, and triangulate findings from different sources. This will help build a richer picture of consumer sentiment towards air travel, including rapidly evolving areas such as sustainability and innovation and ensure there is an informed basis upon which to develop policy in the best interests of consumers.

In addition, we continue to draw on relevant CAA data and insights including the quarterly Aviation Trends publication², passenger complaints data³ as well as the CAA's Airport and Airline Accessibility Performance Frameworks.

In general, our input to consumer research involves providing advice on survey questions and areas to explore, providing feedback on developing outputs, offering insights and analysis on key findings and considering how such findings (and the data that supports them) can be used across the CAA, and more broadly across the aviation sector and Government, to inform policy development.

Aviation Consumer Survey – Wave 13

We provided support to the latest wave (wave 13) of the Survey in Q3 and Q4 2024, working closely with Savanta and the CAA. This included helping shape a number of the questions posed to consumers on their travelling experience, providing advice on new questions and areas to explore, and offering insights and analysis of the results. In particular, the Panel helped review the mix of pre-existing questions and new topical questions to ensure the Survey had continuity and comparability with previous waves, while also considering emerging trends and possible changes in consumer behaviour. Among other things, the Survey found:

- Consumers are flying in the highest numbers since the Survey began in 2016, with 62% having flown in the last 12 months.
- The shift since the pandemic in the demographic profile of recent flyers has continued with younger consumers far more likely to have flown.

¹ See [Aviation Consumer Survey](#).

² See [Aviation Trends](#).

³ See [Passenger Complaints Data](#).

- Budgetary constraints are – by some distance – the most frequent reason given for not having flown in the last 12 months, with two fifths of consumers who have not flown recently citing this as a factor (38%).
- Consumer satisfaction with the overall travel experience on their most recent flight has risen to its highest level (84%) since 2019. While consumers are satisfied with aviation in higher numbers than with other modes of transport, there are divides in satisfaction by household income and digital confidence, which are more pronounced than in other industries. The gap in overall satisfaction between disabled and non-disabled consumers' most recent flights has narrowed from 2023 – though there remains a large gap in general satisfaction. Overall satisfaction has also recovered across most regions in the UK – particularly Northern Ireland.
- Satisfaction with complaints handling, which has declined in recent years, shows significant improvement this year (at 62%) which has likely contributed to the rise in overall satisfaction. Value for money was the only element of air travel tested where satisfaction still lagged significantly behind pre-pandemic levels – with disabled and digitally excluded passengers significantly less satisfied with value for money than other passengers, with this gap widening since last year.
- In terms of consumer priorities and perceived industry priorities:
 - Although reducing the cost of flying was the most widespread priority area for investment in the next 12 months, only 27% of consumers choose this as their top priority. This is the most-selected top priority, and the low figure is a reflection of the breadth of different top priorities.
 - Travel disruption is faced in similar numbers to last year. Disruption negatively impacts consumer satisfaction, but also appears to erode consumer trust in the industry more widely – including in areas apparently unrelated to travel issues such as reducing the cost and environmental impact of flying.
 - Attitudes towards the environment are similar to last year, with widespread concern about the environment, but relatively few consumers willing to fly less or pay more to offset the environmental impact of flying.

We would like to thank Savanta for presenting at our strategy day in July 2024 and our January 2025 Panel meeting. We are also pleased that the Survey's findings were considered at CAA Senior Executive meetings. Consistent with our commitment to share learnings with other bodies, we have shared the latest wave with Consumer Scotland and the Consumer Council for Northern Ireland (CCNI).

Yonder research on airline communication with passengers during disruption (July 2025)

Following publication of the Final Report of the Independent Review of the NATS (En Route) failure in 2023, the CAA commissioned Yonder to undertake consumer research into airline communication with passengers during disruption. We provided advice on the draft research brief and questionnaire, reviewed and provided comments on a mature draft of the report and advised on accessibility and screen reader compatibility. At the time of drafting this report, we understand the research findings are being finalised and due to be

published shortly. We look forward to further engagement on the published report, including next steps on taking forward improvements based on the findings.

Other insights

As set out above, our new work programme committed to draw on other relevant insights from different sources to help build a richer picture of consumer sentiment towards air travel, including:

- The NATS Aviation Index⁴ – seventh edition.
- Two UK Research and Innovation (UKRI) funded studies.
 - Future Flight Survey 2024⁵; and
 - Framework for Future Flight in the UK: Principles⁶ from a Deliberative Public Dialogue.

CAA consumer insight work

We have continued to make the case for the CAA to conduct a gap analysis and use this to inform decisions on what further targeted research is needed in order to understand the aviation consumer experience. In particular, as part of our work to encourage the CAA to further embed the consumer interest across the organisation, we recommended the creation of a cross-CAA ‘consumer research and insights’ hub to foster a more joined up approach to gathering, sharing and utilising consumer insights. We look forward to further engagement with the CAA on how to progress this and other recommendations.

Sharing learning

We have continued to build good relationships and share learnings with external bodies, including consumer organisations, regulators and other consumer panels, as well as the CAA’s Environmental Sustainability Panel. In recent months, we have engaged with UKRI’s Future Flight Challenge Director, who presented at our October 2024 Panel meeting; Airlines UK, who presented at our January 2025 meeting; CCNI to discuss their accessibility awareness campaign and aviation complaints statistics; and Consumer Scotland to discuss the Survey and possible areas of collaboration. The Chairs of four independent consumer panels also met twice to discuss common areas of interest, including the differences between consumer panels which have a statutory or voluntary basis; the role of regulators in providing information to educate consumers; the Government’s growth agenda; and greenwashing.

⁴ See [NATS Aviation Index 2024](#).

⁵ See [Future Flight Survey 2024](#).

⁶ See [Principles from a Deliberative Public Dialogue, July 2024](#).

Concluding comments

The evidence noted above has helped build a stronger evidence base of consumers' priorities and needs as part of the new 'post-pandemic' aviation landscape. It has also supported our scrutiny of CAA and Government policy, enabling the development of more effective evidence-based proposals for change where needed.

Driving better outcomes for consumers

Our focus is on improving the aviation experience for current and future aviation consumers. Whilst a key concern is price, it is also important that accessible, useful, comparable information on quality is available so that consumers are able to make informed comparisons and vote with their feet. Where outcomes are regulated or influenced by the CAA, our aim is to ensure that the consumer interest is reflected throughout the policy development and regulatory design process, and as part of monitoring and enforcement. In particular, the needs of consumers at risk of vulnerability should be taken fully into account so they can participate in the market effectively, and consumers need to be able to seek quick and fair resolution when things go wrong, with complaints data used systematically by industry to inform improvements over time.

Consumer satisfaction

- As noted above, we are pleased that the latest wave of the Survey demonstrates a significant change, with overall consumer satisfaction rising to its highest level since 2019. While we still have concerns around specific areas of consumer satisfaction which need to be explored and addressed (as set out in the bullet points below) we broadly welcome this as a sign of growing consumer confidence, particularly as rising dissatisfaction was an area of concern we highlighted in our new work programme. At the same time, we are also mindful of not placing too much weight on a single wave of the Survey and will look with interest towards future waves to see if a longer-term trend of increasing satisfaction materialises.
- In the next wave of the Survey, we would like to focus on understanding the drivers behind the improvement in overall satisfaction which appears to be likely driven by improvements in complaint handling. While we welcome this increase, satisfaction with complaint handling remains significantly lower than other parts of the passenger journey and is therefore still an area of concern for the Panel where further improvement is needed. There also remains a large, albeit narrowed, gap in satisfaction between disabled and non-disabled consumers.
- It will also be important to explore other areas of dissatisfaction, such as value for money which still lags significantly behind pre-pandemic levels, particularly for consumers who are digitally excluded or at risk of vulnerability, as well as other issues including the continued increase in demand for special assistance services.

Consumer protection, alternative dispute resolution, enforcement and legislative reform

- As noted above, this reporting year has seen a period of significant change. This includes enhanced Government and CAA focus and investment in the area of Consumer Protection to expand the CAA's monitoring and enforcement of consumer rights. We provided input at the January 2025 CAA Board and at Panel meetings on proposed plans in this area, which are set out in the CAA's 2025/26 Scheme of Charges. We are very supportive of additional investment, which has the potential to drive better outcomes for consumers and agree with the CAA's planned work in this area including: a new consumer rights compliance programme; work to better understand pricing practices in the sector, particularly to ensure consumers can make informed purchasing decisions and are treated fairly; and a project to assist the Government in considering future legislative powers to ensure that the CAA has the effective consumer protection tools.
- In the area of alternative dispute resolution (ADR), we continue to strongly support mandatory ADR being introduced in the aviation sector, which we are pleased is being considered in the context of potential legislative reform of the CAA's consumer powers. We have also input to the CAA's review of approved ADR entities, which focuses on consumers' overall experience of ADR. The CAA sought our views on whether the planned scope for the review sufficiently covers the consumer ADR journey, and whether the Panel had any additional suggestions on what the review should assess. The review is ongoing at the time of drafting this report and we look forward to seeing the final report.
- On enforcement and legislative reform, we have continued to work with the CAA to make best use of its existing powers to benefit consumers, including in respect of the Digital Markets, Competition and Consumers (DMCC) Act 2024 which recently came into force. The DMCC Act gives the CAA access to new – albeit still limited – powers to request the court to impose monetary penalties in specific circumstances when enforcing consumer law. We are pleased the CAA plans to update relevant guidance in this area to reflect these changes, and look forward to engaging with the CAA on this. At the same time, we continue to strongly advocate our long-held position for the CAA to be given direct powers to enforce consumer rights akin to other regulators, and welcome the CAA's ongoing and planned work in this area as noted above. We also welcome the Competition and Markets Authority's (CMA) recommendation in its review of competition concurrency arrangements, that the Government considers widening the CAA's competition jurisdiction to align with its regulatory responsibilities, which we consider could help further improve consumer outcomes.

Accessibility and consumer vulnerability

Over this reporting year, we feel we have had particular impact in the area of accessibility and consumer vulnerability:

- We have continued to prioritise and advocate the needs of consumers at risk of vulnerability and those with accessibility needs throughout our work. In particular, the Panel is participating in the Aviation Accessibility Task and Finish Group, which is ongoing at the time of writing this report. We have also been promoting the CAA's Vulnerability Toolkit and Consumer Principles across the CAA, in areas including Aviation Security Human Factors; the CAA's new AI Strategy; the Law Commission's work on autonomy in aviation; and the CAA's customer experience work. We will continue to work with CAA colleagues in this area, and have also recommended a more systematic approach to promoting and embedding these important toolkits across the CAA. Please see 'influencing future framework' section below for further information.
- We have also held various workshops with the CAA's Consumer Protection team where we input on a range of topics including the CAA's planned wheelchair damage consultation, which we referenced in our new work programme. We are pleased to see the CAA's proactive approach on this important issue, which we feel provides greater transparency in helping consumers make more informed choices. We have also engaged with CAA colleagues on the accessibility performance frameworks for airports and airlines and the issue of increased demand for special assistance services.
- We have engaged with CAA colleagues on the digital accessibility and usability of the CAA's website and other platforms, including the new ATOL Claims Portal. In light of new Panel membership, we have also had a specific focus on digital accessibility for those who are visually impaired. In particular, we have highlighted the importance of improving the accessibility of the CAA's content and website for those who use screen readers, and provided advice and guidance in this area. While the area of digital accessibility is not static and requires continuous learning and improvements, we would like to thank CAA colleagues in the Communications and Consumer Protection teams who have been open and responsive to making material more accessible, particularly in respect of onboarding material for new members. We were also pleased to be invited to the Consumer Protection team's Disability Equity in Aviation training in March, and plan to arrange an internal CAA event to raise further awareness and understanding of this important issue.
- We are pleased that the Transport Committee published its report on disabled people's access to transport in March 2025. In 2023, we submitted a detailed written response to the Committee's call for evidence at the start of the inquiry on "Accessible transport: legal obligations" where we highlighted a number of barriers in the aviation ecosystem that risk poor accessibility outcomes for consumers, and

how to potentially address these.⁷ We are pleased that the report highlights some of the key issues raised in our submission and references the CAA's Aviation Consumer Survey as evidence.

Environmental sustainability

- We have continued to input to the CAA's Consumer Environmental Information project, holding workshops with CAA colleagues on the 'Draft Principles' consultation and submitting a written response. Our response, which recommended that the principles should form part of and be mapped onto a broader framework, was well received and we understand the Panel's proposals are being used to help inform next steps for the project.
- We also input to the CAA's Aviation Environmental Review (AER) consultation and the Panel Chair has continued to engage with the Chair of the Environmental Sustainability Panel on areas of collaboration. In particular, the Chairs held a joint 'lunch and learn' event for CAA colleagues in December 2024. The purpose of the event was to:
 - Raise awareness of the Panels' roles as advisors to the CAA on matters relating to consumers and environmental sustainability.
 - Build CAA colleagues' understanding of what the 'consumer interest' and 'environmental sustainability' means in practice – and how the Panels can help CAA colleagues build this in when developing policy.
 - Discuss policy areas where there is both 'consumer' and 'sustainability' angles and why it's important for the CAA to think about these angles in a holistic way – including possible interactions and trade-offs.

Innovation

Over this reporting year, we have had particular impact across various strands of work in the area of innovation:

Artificial Intelligence (AI)

- We have worked with the CAA as it develops its approach to the regulation of AI in the aviation sector and its use in the CAA, including helping develop a 'think piece' on how the Consumer Principles interact and align with the AI Principles, which was recently published as official CAA guidance to industry.⁸ We are also pleased that the team took on board the Panel's advice and also published an accessible version.⁹
- We have provided input to the CAA's AI Strategy which was published in November 2024, to ensure a stronger consumer focus. In particular, Part B of the

⁷ See [Access denied: rights versus reality in disabled people's access to transport](#).

⁸ See [Protecting Consumers in a Future World of AI-Enabled Aviation](#).

⁹ See [CAP3064G Accessible version](#).

Strategy sets out some proposed steps on how to integrate the AI and Consumer Strategies, which notes that the CAA will “continue to draw on the extensive expertise of the CAA’s Consumer Panel to gather input on the potential benefits and risks of AI implementation from a consumer perspective, ensuring that consumer interests are central to our AI adoption plans.” We will continue to provide input to this important area and would like to thank CAA colleagues for their open, proactive and collaborative approach.

Law Commission’s project on autonomy in aviation

- We have provided input to the Law Commission’s project looking at autonomy in the aviation sector, which is an important framework that will transform future travel for consumers. Following engagement with the Panel, we were pleased to see the Law Commission’s call for evidence had a consumer and accessibility focus, and included references to the Consumer Principles and CAP2539¹⁰ which the Panel helped develop. We also submitted a comprehensive written response to their call for evidence. In addition to responding to detailed consultation questions, our response highlighted key themes, gaps, opportunities and practical considerations for the Law Commission to consider alongside the development of future regulatory and legislative frameworks which in our view will be essential to make autonomy in aviation work in practice for consumers and the public. These include:
 - Building consumer and public acceptance, confidence and trust iteratively in new technology.
 - Considering the end-to-end ‘Future Flight’ journey holistically and the roles, responsibilities and interactions between key stakeholders.
 - Challenges in regulating AI.
- We will continue to engage with the Law Commission, CAA and UKRI as this project progresses.

Other areas

- UKRI’s Future Flight Challenge Director presented on the Future of Flight studies¹¹ at our October 2024 Panel meeting.
- We have continued to offer support to CAA colleagues in other areas of innovation, including Beyond Visual Line of Sight (BVLOS) operations, on how the Consumer Principles could apply.
- We contributed to the CAA’s response to Aerobility’s white paper on inclusion in the future flight sector. We clarified our role in working with CAA colleagues on

¹⁰ See [CAP2539](#).

¹¹ See page 11 above.

developing CAP2539 and our view that the Consumer Principles is an important framework in ensuring the consumer interest is considered in the context of advanced air mobility.

Independent NATS (En Route) Review

We continued to input to the Independent Review of the NATS (En Route) failure in 2023. We provided input at the CAA's June 2024 Board meeting and further feedback on the proposed approach to implementing recommendations at our July 2024 meeting. This included a discussion on one of the recommendations relating to the status, powers and resources of the CAA Consumer Panel.¹² The Final Report was published in November 2024. More recently, as part of the March 2025 ExCo meeting and April 2025 Panel meeting, we input to the draft 'Progress Report on the Recommendations from the Independent Review of the NATS (En Route) failure in 2023' which has recently¹³ been published. This included a discussion on the Panel's role in providing an independent view on the implementation of CAA recommendations.

Economic regulation

- We provided input to the CAA's approach towards the Heathrow airport price control review (H8), including advising on the team's approach to consumer research and recommending potential suppliers; and discussed the H8 Draft Method Statement as well as the Outcome Based Regulation (OBR) Mid-Term Review via various workshops and at the July 2024 Panel meeting. We have also started discussions with CAA colleagues around the potential expansion of runway capacity at Heathrow airport and its implications for consumers.
- We input to the CAA's review of its future approach to the economic regulation of Gatwick airport, including reviewing the team's draft consultation and providing comments on the Final Proposals which were discussed at the January 2025 CAA Board meeting, which the Panel Chair attended.
- As part of the NR28 price control process, we worked with the CAA to provide advice on draft research methodology proposals from NATS (En Route) Plc's research agency, to ensure the consumer interest is reflected in the business planning process.

Other work

- We held interactive workshops with the CAA on its Customer Experience and Modernisation Programme. During these workshops, we highlighted the Consumer Vulnerability toolkit and the read across between consumer and customer best

¹² Recommendation 24 states "Government should consider the appointment of a statutory consumer body to collect, research and represent the views of air passengers and air freight users... Options may include strengthening the status, powers and resources of the CAA Consumer Panel..."

¹³ See [Progress Report](#).

practice approaches, including the importance of user research to better understand customer needs from the outset as part of the end-to-end journey.

- We input to the CAA's People Strategy and Annual Strategic Objectives for 2025/26 and the CAA's new ATOL Claims Portal, where members undertook user testing and participated in an interactive workshop where they provided feedback on a live demonstration of the new portal. We have also engaged with CAA colleagues on ATOL reform.
- More recently, we were approached by CAA safety colleagues to provide feedback on a Safety Risks Assurance Board Paper. While we do not have technical safety expertise and much of this work is outside our remit, we welcomed the opportunity to comment and highlight various implications this work could have for consumers. As part of this, we highlighted the importance of reflecting consumer research on attitudes towards safety and future flight (as set out above in UKRI's research), which was well received. We have also had initial engagement with the CAA team responsible for regulating the commercial spaceflight industry to understand the regulatory framework and identify possible interactions with the consumer interest.
- More generally, we have continued to build our impact and visibility across the CAA, including through internal blogs and the launch of a new accessible intranet site. The new site promotes the Panel's role and sets out how members can help CAA colleagues better understand and reflect the consumer interest in their work.

Influencing future frameworks

As set out above, this reporting year represents a significant period of change which presents opportunities and challenges for consumers, the Government, CAA and industry to navigate as part of the new 'post pandemic' aviation landscape. Within this context, we have sought to improve outcomes for consumers by providing support, advice and guidance in progressing several areas of work across the CAA, and to ensure the right frameworks are in place – including those noted above.

Embedding the consumer interest more widely across the CAA

We have considered how the CAA could embed the consumer interest more widely across the CAA. In late 2024, we were asked by the CAA's Chair to consider how the CAA could deliver more for consumers. Among other points, we recommended the CAA:

- Builds a cross-organisation 'consumer network' that embeds targeted consumer focused resource to promote a better understanding of the consumer interest in different policy areas, informed by a systematic 'consumer interest' mapping exercise across the organisation and wider application of the Consumer Principles and Consumer Vulnerability Toolkit. We feel this could potentially lead to considerable consumer benefits and help the CAA further build its understanding of where to target consumer focused resources.
- Creates a cross-CAA 'consumer research and insights' hub to foster a more joined up approach to gathering, sharing and utilising consumer insights.

- Reviews its approach to risk appetite on consumer matters and whether further consumer focused training and education across the CAA could be beneficial.
- Considers updating its September 2023 Consumer Strategy, which we helped shape, to reflect these developments.

We look forward to further engagement with the CAA on how to progress these recommendations.

As part of this, we have been proactive in promoting the Consumer Principles and Vulnerability Toolkit in areas including aviation security human factors; the CAA's AI new strategy; the Law Commission's work on autonomy in aviation; and the CAA's customer experience work. We will continue to work with CAA colleagues in this area, but as noted above, we recommend a more systematic approach to understanding and embedding these important toolkits across the CAA.

More generally, we are pleased that the Panel's visibility and impact is extending to a wider range of areas across the CAA, and that less obvious policy areas are considering the consumer interest more systematically at an earlier stage. In particular, our new intranet page highlights the benefits of early engagement with the Panel and throughout the policy development process, as evidenced by various CAA colleague testimonials, which can help future-proof policy and make it more consumer focused, robust and evidence-based.

Public Bodies Review

The 2023 Public Bodies Review made a number of recommendations relating to the Panel. We welcome the continued increased engagement between the CAA's Senior Executive and Panel following these recommendations. This includes the Panel Chair's attendance at two CAA Board meeting per year and more regular sharing of the Board's forward agenda as well as initial discussions around the Panel Chair being sighted on ExCo and Board papers which have particular relevance to consumers.

We also welcome the recent appointment of two new Non-Executive Directors to the CAA Board, including Trisha McAuley OBE, a former member of the Consumer Panel, and we look forward to further engagement with appointees as recommended by the Public Bodies Review.

Priorities for 2025 - 2026

Over the next year, we will continue to deliver on our new work programme and be responsive to further developments that shape new 'post pandemic' aviation landscape in the best interests of consumers. This includes:

- Continuing to build our engagement and relationships across the CAA at a senior and working level.

- Supporting the CAA as it progresses its five strategic priorities as outlined by the Secretary of State for Transport, particularly the priority area on consumers which includes the CAA's new Consumer Protection work programme and associated work.
- Exploring and addressing the four challenges set out above in the Panel Chair's foreword.
- Ensuring the needs of those at risk of vulnerability are recognised and prioritised.
- Continuing to input to other important areas of work including innovation, economic regulation, the customer experience and aviation security.

Chapter 3

Transparency

Expenditure

The Panel cost the CAA £78,011.73 in Chair and member fees and expenses in the year to 31 March 2025.

Panel meetings

In the year ending 31 March 2025, the Panel met formally four times. The minutes of these meetings are published¹⁴ on the CAA website. In addition, a number of sub-groups of the Panel worked on individual workstreams throughout the year aligned to the Panel's work programme. The Panel works in an agile and flexible manner across the CAA to help colleagues understand the consumer interest in their particular policy area and responds to requests for written feedback as they arise.

Terms of Reference

The Panel's Terms of Reference are published on the CAA website.¹⁵

Working with stakeholders

The Panel primarily interacts with the CAA, providing advice and engaging with staff at all levels. In 2024 -2025, as part of its work with stakeholders the Panel also engaged with:

- Advertising Standards Authority's Advertising Advisory Committee
- Airlines UK
- Consumer Council for Northern Ireland
- Consumer Scotland
- Communications Consumer Panel
- Financial Services Consumer Panel
- Law Commission
- Legal Services Consumer Panel
- Which?
- UKRI (UK Research and Innovation)

¹⁴ See [Consumer Panel webpage](#).

¹⁵ See [Consumer Panel Terms of Reference](#).

Chapter 4

Panel members and secretariat

Chair

Rt Hon Jenny Willott OBE, Chair

Jenny was appointed to the Panel in January 2018. Jenny was a Member of Parliament for Cardiff Central for ten years, serving as Consumer Affairs Minister, with responsibilities including consumer policy, competition policy and employment law, Women and Equalities Minister and as a Government Whip. She is now the Chief Executive of the charity Re-engage and a Non-Executive Director of SELCAT multi-academy trust. She was formerly the Director of Enterprise and Innovation at St Mary's University, Twickenham, and until December 2020 was a Non-Executive Director for the Independent Parliamentary Standards Authority. Prior to entering Parliament, she worked in the voluntary sector, including as Chief Executive of Victim Support South Wales and Head of Advocacy for UNICEF UK.

Members

Carol Brennan (member until 31 March 2025)

Carol is an Honorary Reader in Consumer Policy and former Director of the Consumer Dispute Resolution Centre at Queen Margaret University, Edinburgh. Carol was appointed to the Panel in October 2018. She recently completed a six-year term as a member of the Office of Rail and Road (ORR) Consumer Expert Panel. She is Chair of the Qualifications and Awards Panel for the Chartered Trading Standards Institute. . Carol has also worked with BEUC, the European Consumer Organisation, to moderate consumer education events. Between 2015 and 2019, Carol was Chair of the Scottish Legal Complaints Commission Consumer Panel. During 2019/2020, Carol chaired a team of experts on consumer education and produced a policy options paper for the European Commission. She is a member of the Queen Margaret University Association Committee. Her research interests include consumer policy, complaint management, dispute resolution, consumer empowerment and customer experience. Carol draws on her research to influence new developments in strategy, policy and practice.

Professor Chris Gill (member since 1 April 2025)

Chris Gill is Professor of Socio-Legal Studies at the University of Glasgow. Chris has expertise in access to justice, administrative justice, and consumer alternative dispute resolution. He has a particular interest in consumer voice and mechanisms for effective feedback, learning, and redress. Chris' research focuses on the experiences of consumers

and citizens, particularly those in vulnerable circumstances. Previous projects have included examining access to justice for energy consumers in vulnerable circumstances and facing energy poverty and examining the barriers facing asylum seekers and refugees in accessing public services and making complaints. He is currently working on a project looking at the concept of "user focus" in English, Scottish, and British tribunals. Chris' research has been funded by the Economic and Social Research Council, the British Academy, Leverhulme, the Nuffield Foundation and the Social Sciences and Humanities Research Council (Canada). He sits on the Ombudsman Association's Validation Committee, the Administrative Justice Council's Academic Panel and the Scottish Legal Complaints Commission's Consumer Panel. Chris also works as a consultant specialising in justice research and innovation.

Deborah Persaud (member since 1 April 2025)

Deborah is a committed disability rights activist and currently Chair of Transport for All. She is also an independent board member at the National Centre for Accessible Transport. A former senior civil servant, working in a number of central government departments over a 35-year career specialising in social and economic policy including consumer affairs, she also travelled the world specialising in border control and customs. She has led corporate and infrastructure projects and has been responsible for turnaround and performance improvement programmes. She also provides organisational development consultancy. Outside of work, she is a Trustee of a heritage property, coaches small businesses and is sought after as a mentor. She travels the world as much as she can, and often takes her guide dog with her.

Helen Dolphin MBE (member until 31 March 2025)

Helen is a committed campaigner on improving transport for disabled people. After becoming disabled in her early twenties, Helen trained as a journalist and worked for ITV Anglia News as a news reporter. She followed this by taking up the role of Director of Policy and Campaigns for a national disability charity. Helen now works as an independent mobility specialist advising Government, public, commercial and professional bodies on how to improve accessibility. She is currently working for Great British Railways Transition Team as the Engagement and Consultation Lead for the National Rail Accessibility Strategy. Helen is a member of the Disabled Persons Transport Advisory Committee (DPTAC), Joint Chair of the Heathrow Access Advisory Group, Chair of the Motability Consumer Panel, Chair of East Midlands Railway Inclusivity Group and a Member of the National Centre for Accessible Transport Advisory Committee.

Jennifer Genevieve

Jennifer is a Deputy Director at the Office of Road and Rail, with responsibility for the ORR's Periodic Review of Network Rail. She has worked on economic regulation, competition policy and consumer protection within sector regulators and industry in roles spanning the rail, aviation, water, financial services, telecoms and broadcasting sectors.

She was previously Head of Stakeholder Engagement & Policy at Thames Water, leading work on the business planning process for the industry price review. She has also worked on the setting of charges at airports across Europe as Head of Airport Regulation and Policy at easyJet. Jennifer served for six years as a member of the Financial Services Consumer Panel. She also previously worked in strategy and competition policy at Ofcom.

Rick Hill MBE

Rick has had a varied career in both the voluntary sector, film/tv industry and media regulation. Chairman of Northern Ireland Screen Commission 2008-2013, he took the lead role in developing digital content, supporting new programme and delivery formats in the film/tv sector. Rick has also worked in consumer advocacy. He was Chairman of the General Consumer Council for Northern Ireland, a member of Consumer Focus UK Board and Chairman of the Scottish Government Consumer and Competition Working Group. He was Deputy Chairperson of the Independent Press Standards Organisation until 2020, and until recently Communications Consumer Panel Chairperson and the Northern Ireland Member. Rick also chaired the Telecoms Industry Forum and the UK Communications Consumer Forum. He is currently an independent member of the Strategic Panel for Non-Domestic Water, UK and an Adjudicator with COMREG, Ireland.

Jacqueline Minor

Following a short period lecturing in law at the University of Leicester, Jacqueline Minor joined the European civil service, first at the European Court of Justice and subsequently at the European Commission. After more than 20 years' working on Internal Market issues, including a period as Director responsible for Consumer Policy, she served as Head of the Commission's Representation in the UK from 2013 until retirement in 2017.

David Thomas

David is a chartered accountant and an economist. He was appointed a specialist panel member at the Competition and Markets Authority in 2017, and in 2018 a member of competition and enforcement decision committees at the Payment Systems Regulator and the Financial Conduct Authority. Since 2016 he has run his own consulting practice focusing on economics, regulation and disputes, largely in the communications sector. David was a director of competition and regulatory finance at Ofcom where he had responsibility for, among other things, price controls. After leaving Ofcom he established and led KPMG's global economics and regulation practice.

James Walker

James is the founder of Resolver.co.uk, a free online complaints service that James grew to help over 18 million consumers a year to resolve their disputes. He has advised the Government on consumer issues and is a Board Member for Consumer Scotland, Collaboration Network and the Dispute Resolution Ombudsman. A winner of Social Entrepreneur of the year, James is a non-executive for a number of start-ups including

Trusted Payments and a highly successful cashback app. His focus is on helping businesses deliver market-leading customer service, while helping consumers understand and exercise their consumer rights. James also had three national weekly consumer columns.

Vaughan Williams

Vaughan is a consumer protection and regulatory lawyer with expertise in industry-based ADR and in regulatory compliance and enforcement. He currently works on redress matters in the Legal Division of the Financial Conduct Authority, and previously worked for a number of years at the energy regulator Ofgem where he was a senior lawyer in the enforcement team. He was previously Principal Investigator at the Telecommunications Industry Ombudsman in his native Australia. Vaughan has also spent time in the community sector, having been Secretary of the Public Transport Users Association in Melbourne and representing that organisation on a number of advisory and advocacy bodies including the working party that established Victoria's Public Transport Ombudsman. He is a supervising lawyer at the Waterloo Legal Advice Service and sits as a magistrate on the South East London bench.

Secretariat

Freya Whiteman

Freya is a Policy Principal in the CAA's Consumers and Markets Group, assigned to support the Panel. She is an experienced consumer, regulatory policy and legal professional who is passionate about making aviation more accessible for consumers, with a track record of delivering a number of CAA publications, consumer focused policies and legislative change. Previous roles include working in economic regulation on the H7 price control review to deliver a more consumer focused approach to service quality regulation (Outcome Based Regulation) and modernising the CAA's regulatory toolkit for NATS En Route Plc under the Air Traffic Management and Unmanned Aircraft Act 2021. More recently, she has led on the CAA's airline website accessibility audit.