Access to Air Travel for Disabled People: 2005 Monitoring study

by Jo Sentinella

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ACCESS TO AIR TRAVEL FOR DISABLED PEOPLE: 2005 MONITORING STUDY

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CONTENTS

Executive summary

The Disability Discrimination Act (DDA) 1995 aims to eliminate discrimination against disabled people. Part 3 of DDA 1995 covers access to goods, services, facilities and premises, but included an exemption for transport services. However, not all services associated with transport fall within this exemption. For example, services and facilities associated with airports, flight bookings and information about air travel are covered by the 1995 Act. This means that most transport providers have always been subject to Part 3 requirements in respect of certain services they provide. A later Act, the DDA 2005 makes it clear that the exemption from Part 3 only applies in connection with the provision and use of vehicles. For air travel that means aircraft and the provision of onboard services. It also gave the Secretary of State the power to lift the exemption and introduce regulations.

Since 2003 the aviation industry has been encouraged to follow a voluntary Code of Practice published by the Department for Transport. 'Access to Air Travel for Disabled People - Code of Practice' sets out minimum standards which should be met by airlines for aircraft design and service on board (which is not included in the DDA) and provides other service providers (including tour operators, travel agents, airports, ground handling companies, and retailers) with advice on how to meet their legal obligations under the DDA.

This report details the findings of a study commissioned by the Department of Transport to assess the effectiveness of the Code of Practice. The primary aims were to assess whether the Code is sufficient or whether exemption from Part 3 should be lifted for aircraft (in whole or in part) and regulations introduced to ensure the needs of disabled people are met,.

The first phase of the project was undertaken in 2004. It consisted of a self-assessment study (surveys of airlines, airport operators, travel agents and tour operators); access audits of airports and aircraft; a mystery shopping investigation of booking procedures; and a survey of disabled passengers that were used to benchmark the industry against the Code. The second phase, carried out 18 months later in 2005, consisted of a number of tasks which, together, were used to monitor change against the Code since 2004. The tasks included interviews with airlines; interviews at airports (covering airport operators, handling agents, security, retail and catering outlets, car park and taxi operators); a mystery shopping investigation of booking procedures; and a survey of disabled passengers. The analysis focused upon the key areas identified in 2004 as areas that could be improved.

The key findings were:

- The study found a few areas where progress had been made in the 18 months since the 2004 survey, although overall there was little change.

- It was common for airlines and airport operators to mention in the interviews that they had addressed disability awareness training of staff. This had often involved the introduction of a new training package or extending training to all staff or introducing refresher courses. However, feedback from the disabled passengers who took part in the 2005 survey suggests that communication between staff and passengers could be improved further. The comments passengers made suggest they felt staff lacked disability awareness, especially in relation to hidden disabilities such as deafness. It should be noted that these passengers did not necessarily travel from the airports or with the airlines that had improved their training.

- Airlines and airports frequently indicated that they had been working to improve the accessibility of their websites since 2004 and some were believed to be compliant with W3C guidance. However, the study found that it was unusual for changes to be made to the booking engine and it was rare for a website to have a facility to enable a disabled customer to book assistance on-line. Booking procedures are already covered by Part 3 of the DDA 1995 so should be accessible to disabled people. This means that, if telephone bookings are accepted, a textphone should be available, and websites with on-line booking and premises open to the public should be accessible.   No changes were reported for telephone bookings. This means that there is still a lack of textphone services.

- The provision of pre-journey information in accessible formats, such as general information about services and specific information about arrangements for disabled passengers, is required under Part 3 of the DDA 1995. The findings show that, whilst progress was being made with website accessibility and information on websites, the provision of pre-journey information in alternative media, such as large print, audio tape, Braille or computer disk, remains low.

- The Code recommends that staff taking bookings should ask all customers if anyone in their party requires assistance at the airport and/or in flight. This recommendation ensures that those who need assistance pre-book. The interviews with airlines suggested

that some airlines had introduced new procedures to increase the number of disabled passengers pre-booking assistance. However, both the mystery shopping study and disabled passenger survey found no difference in the number of disabled passengers being asked if they needed assistance or pre-booking assistance. Disabled people reported that the systems to obtain assistance were often confusing or complex. The study also found that few disabled passengers received confirmation that their request for assistance had been dealt with, as the Code suggests.

- Not all the airlines followed the Code's recommendation to permit disabled passengers to pre-book seats. The airlines explained this was because 'all seats are the same', that 'no frills' airlines did not have seating allocations, or due to how charter airlines sold seats to tour operators.

- Few airlines complied with the Code's recommendation to provide an additional seat for an escort or if the person required an additional seat because of their disability, at a discount on the full fare. This is an area not covered by the DDA.

- The interviews indicated that some airlines did not have a clear policy on determining self-sufficiency or which passengers need to travel with an escort.

- The airport operators interviewed indicated that they had made progress with the implementation of some access audit findings and development of strategies to improve the accessibility of airport terminals. However, the changes that were made did not follow all aspects of good practice and usually failed in the detailed recommendations; for example, the toilet door was too heavy. This means some disabled people would have difficulty using the facility or would be unable to use it.

- Few changes in the availability of help points at points of arrival were reported in the monitoring study, suggesting that provision remains limited.

- Assistance provision was an area that had not undergone much change since 2004. This was largely because airlines and airport operators said they were awaiting the outcome of a proposed EC regulation concerning the rights of persons with reduced mobility when travelling by air. This regulation would change how assistance is provided at the airport. Airport operators would have overall responsibility for providing comprehensive assistance to disabled people and those with reduced mobility from the point of

arrival to point of departure.   This includes assistance at the airport and boarding the aircraft to the seat. The cost of the assistance would then be charged to airlines, proportional to the number of passengers carried by each airline at each airport. Currently, the airport operator covers the cost of assistance *to* check-in and the airline *from* check-in.

- The monitoring study found that certain aspects of assistance the Code recommends in-flight, such as assisting a disabled passenger move to the toilet facility or helping passengers with cutting food, were not always provided by airlines. The airlines that did not provide this assistance cited health and safety reasons for not helping a passenger use an on-board wheelchair or felt the passenger should be able to cut their own food under the self-sufficiency criteria. This is not an area covered by the DDA.

- Not all airlines provided an on-board wheelchair that could be used to assist passengers to and from the toilet. It should be noted that the Code does not specify that an on-board wheelchair (or indeed wheelchair accessible toilet) is required and it is not covered by the DDA.

- Whilst not specifically covered by the DDA, the Code recommends information available in alternative media for disabled passengers on board aircraft. The monitoring study found that this is still lacking. This is a particular concern for safety information. In the 2005 survey, only one passenger with a vision impairment said they received a personal safety briefing on the flight and, whilst some airlines provided Braille versions of safety instructions, not all people with a vision impairment read Braille. Large print versions were not usually available.   Passengers with a hearing impairment indicated that sub-titles were not always available on safety videos.   Although safety cards are pictorial there was a suggestion that these should be piloted or tested with people with learning disabilities.

- It was common for airlines to have developed policies relating to the carriage of assistance dogs and implemented the scheme on PETS approved routes.   There were, however, differences in airline policies, such as whether a charge was made for an additional seat or covering the cost of the dog being checked by the animal clearing agent. None of the airports in this study provided a dog relief area for assistance dogs as described in the Code.

- No changes were reported in the loading of wheelchairs or the protection of wheelchairs during transit. Airlines expressed concern about passengers under-insuring the items, as the maximum they were liable for under current regulations may not cover the full value of the wheelchair.   A few airlines had explored how to provide a temporary replacement wheelchair, if the wheelchair was lost or damaged in transit. DPTAC is currently exploring this issue.

- The design of aircraft is exempt from Part 3 of the DDA. The 2005 survey found few changes as few newly refurbished or new aircraft had been introduced. A common change to aircraft reported by airlines to their fleet included the installation of moveable armrests on at least 50% of economy class seats, as recommended in the Code. It was less common for airlines to report that changes had been made to toilet design, handrails, signage, lighting and the use of colour and tonal contrast within cabins. The newly refurbished aircraft viewed for the monitoring study had incorporated some changes recommended by the Code, such as a greater use of colour and tonal contrast, new toilet fittings and the provision of seats with moveable armrests. Other changes were compromised by the existing aircraft design, for example the provision of a toilet sufficiently large to accommodate an on-board wheelchair and assistant. This had led to the adoption of solutions involving the use of curtains or temporary door fixings to increase the amount of space available adjacent to the toilet.

- Generally, larger airlines reported an intention to follow the Code when purchasing new aircraft, whilst smaller airlines felt they had little control over the design. They were more likely to purchase used aircraft or lease aircraft. This restricted the changes that could be made, for example the provision of a toilet large enough to accommodate an on-board wheelchair and assistant. They also stated that leasing agreements restricted the changes that could be made, as the leasing company required the aircraft to be returned in its original state.

Based upon these findings, the following conclusions and recommendations were made:

- It is suggested that there is not a strong need for UK regulation in addition to the proposed European regulation, concerning the rights of disabled people when travelling by air.

- The Code should be updated to reflect the changes in responsibility resulting from the European regulation. The Code's recommendations should show how airlines and airports can meet their obligations and suggest good practice to enhance this service.

- The Department for Transport should liaise with leasing companies to find out how the Code's recommendations could be incorporated in refurbishments within leasing agreements.

- The industry needs further encouragement to follow those parts of the Code already covered by Part 3 of DDA 1995. Procedures to increase pre-booking assistance and the provision of information in alternative media needs to be promoted. Travel agents, tour operators and airlines need to ensure their staff ask all passengers if anyone in their party requires assistance.

- Safety regulations should be reviewed with the CAA to help airlines develop consistent policies regarding the carriage of disabled passengers and seat allocations. The CAA could also consider the accessibility of safety information for all disabled passengers.

- The Department for Transport should clarify whether the proposed EC regulation permits airlines to charge passengers for an additional seat if they travel with an assistance dog. The Code states that assistance dogs should travel at no extra charge but some airlines make a charge for an additional seat if the dog is large, for example.

- Airlines should incorporate those changes that are not restricted by physical limitations of the aircraft when being refurbished, for example moveable armrests, signage, handrails, lighting and colour and tonal contrast.

- Airlines should ensure that their, and their handling agents' staff who allocate seats, have the knowledge to assess what is the most appropriate seat for people with different types of disability. Passengers that need to transfer to and from an on-board wheelchair should be allocated a seat on a row with moveable armrests.

- Airlines need to ensure that check-in staff confirm whether a passenger has pre-booked assistance and, if not, have the skills to be able to assess whether a passenger needs assistance and what the most appropriate assistance would be.

- Airports need to consider the availability of help points in areas where people need to request assistance and the provision of facilities for assistance dogs. Airports could also consult the good practice guidance recommended in the Code when planning and designing new facilities. They need to ensure architects and designers are familiar with the Code and have access to relevant good practice documents. Procedures could also be introduced to ensure that standards are followed and new facilities follow good practice.

- Airports that had established working groups together with an individual who was responsible for accessibility appeared to be the most successful at implementing changes and influencing business partners. This approach should be considered by other airports.

- Once airports become responsible for assistance provision, they should consult the Code to develop service level contracts for assistance provision at the airport. They need to consider how assistance should be delivered, equipment used and staff training.

- Disabled Persons Transport Advisory Committee's guidance for disabled people travelling by air should be updated to reflect changes in European legislation. Airlines, airports, travel agents and tour operators could promote the availability of the guide among their customers.

1   Introduction

The Disability Discrimination Act (DDA) 1995 aims to eliminate discrimination against disabled people. Part 3 of DDA 1995 gives disabled people a right of access to goods, facilities, services and premises. Under the Act it is illegal for a service provider to discriminate against disabled people by refusing them service; providing them with service on worse terms; or providing a lower standard of service. The duties on service providers under Part 3 of DDA 1995 have been introduced in three stages:

1. Since 1996 it has been unlawful for service providers to

  - *treat disabled people less favourably than other people for reasons related to their disability.*

2. Since October 1999 service providers have been required to take reasonable steps to:

  - *change any practice, policy or procedure which makes it impossible or unreasonably difficult for disabled people to use a service; and*

  - *provide an auxiliary aid or service, which would enable disabled people to use a service.*

3. Since 1 October 2004 service providers have been required by law to take reasonable steps:

  - *to ensure that any physical feature that makes it impossible or unreasonably difficult for a disabled person to use the facility should either be removed, altered or a reasonable means of avoiding it be provided.*

The 1995 Act included an exemption from Part 3 for *'any service so far as it consists of the use of any means of transport'*. However, not all services associated with transport fell within the specific remit of the transport exemption. For example, those associated with transport infrastructure, such as airports, ports and railway stations, were covered by Part 3 and were thus dealt with in the same way as for access to other services. This means that most transport providers have always been subject to Part 3 requirements in respect of certain services they provide, for example, booking, information and timetabling services. A later Act, the DDA 2005 makes it clear that the exemption from Part 3 only applies in connection with the provision and use of vehicles, and now includes a regulation-making power to enable the Secretary of State to lift the exemption, in whole or in part (and at different times), in respect

of transport providers operating certain types of vehicle, including aircraft.

Airlines have been encouraged to follow a voluntary Code of Practice, published by the Department for Transport (DfT) in March 2003. The document 'Access to Air Travel for Disabled People - Code of Practice' details how aircraft should be made accessible for disabled people and the service that should be provided when flying. The document is aimed at all those involved in providing air travel services including:

- travel agents;

- tour operators;

- UK airlines;

- UK airports;

- ground handling companies; and

- retailers.

It sets out minimum standards which should be met by airlines and provides advice for service providers already covered by the DDA on how to meet their legal obligations.

The Department for Transport commissioned TRL Limited to evaluate the effectiveness of the Code of Practice. The aim of the project was to help identify whether the Code is sufficient or whether a change in legislation is required by examining the level of compliance of the air travel industry with the Code of Practice. The first stage of the project benchmarked the air industry against the recommendations in the Code of Practice and the second monitored any changes that had been implemented after 18 months.

This report summarises the findings of the second phase of the project. It is in five sections. The first section details the background to the study, the second the methodology and section three presents the findings. Section four discusses the findings and the final section lists the conclusion and recommendations.

2 Method

The project consisted of a number of studies undertaken to investigate the influence of the Code of Practice on the air travel industry. These included:

- a review of airlines;
- a review of airports;
- a mystery shopping investigation of booking procedures; and
- a survey of disabled people travelling by air.

2.1 Review of airlines

The review of airlines consisted of interviews with airlines that responded to the survey in 2004. Five additional airlines that had not responded to the 2004 survey were also interviewed to ensure the sample covered a broad range of airlines.

Of the seven airlines that responded to the 2004 survey, one airline declined to be interviewed because they believed they were as compliant with the Code as they could be and had made no changes since the last survey. The findings are therefore based upon 11 airlines: six airlines which responded to the survey in 2004 and five 'new' airlines.

The final sample encompassed:

- three airlines operating predominately scheduled services;
- four airlines operating predominately chartered services;
- two 'no frills' airlines[1]; and
- two charter airlines with 'no frills' subsidiaries.

The number of passengers uplifted in 2003 ranged from approximately 119,000 to 29 million (CAA, 2004). All the airlines flew from airports of varying sizes including major, large, medium and small regional airports. One scheduled airline predominately flew from smaller regional airports.

The type of aircraft used by the airlines included:

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[1] The term 'no-frills' is used to describe scheduled services which do not include in-flight services such as meals, refreshments or entertainment in the fare. These are usually short-haul flights.

Table 1: Type and size of aircraft used

Aircraft Type	Number of seats (min-max)
Airbus A300	280-360
Airbus A319	126-156
Airbus A320	150-180
Airbus A321	189-220
Airbus A330	280-360
Airbus A340	272-339
BAE 146	85-105
BAE Jetstream 31/32	20
BAE Jetstream 41	29
Boeing 737	110-189
Boeing 757	180-235
Boeing 767	252-326
Boeing 777	227-383
Bombardier Dash 8	36-78
Bombardier Regional Jet	50
De Havilland Dash 8	36-78
McDonnell-Douglas DC10	241-273

The interviews sought to establish which parts of the Code were being followed, those parts that had not been met and explored the reasons why changes had or had not been made.

2.2 Review of airports

The review of airports revisited the nine airports that took part in the accessibility audits in 2004.

The sample encompassed three broad categories of airport operation, reflecting the diversity of the industry:

- major international airports, handling in excess of 15 million passengers each year;

- medium and large regional airports, with a range of domestic and international short-haul services, handling between 3-15 million passengers each year; and

- small local and regional airports, primarily used by operators of domestic services to provide connections within their regions or with London or other large cities.

Table 2 describes the nine airports selected.

Table 2: Traffic characteristics and size of the airports reviewed

Traffic characteristics
Major international hub with extensive domestic services
Major airport with strong charter market and many short-haul services
Large regional scheduled hub, also strong charter market
Large airport, primarily no-frills services
Medium sized airport with no-frills and short-haul scheduled services
Medium sized regional airport, primarily no-frills services
Small regional airport with no-frills and charter services
Small regional airport used for domestic and no-frills services
Small regional airport for short-haul flights and links to London

At each of the nine airports the airport operator was interviewed. Where possible, interviews were also carried out with other personnel and business partners at the airport. Across the nine airports this included:

- six security personnel;

- three airport concessions/commercial managers;

- two retail organisations with multiple outlets;

- ten handling agents responsible for check-in and/or assistance;

- three independent car park operators; and

- one taxi rank operator.

As with the airline interviews, the interviews sought to establish which parts of the Code were being followed, which parts had not been met and to explore the reasons why changes had or had not been made since 2004.

2.3 Mystery Shopping Investigation

To assess whether compliance with the Code's recommendations for booking procedures had changed since 2004, a mystery shopping investigation was repeated in 2005, using the same approach as in 2004.

A mystery shopping approach uses trained interviewers to pose as clients making enquiries to determine whether agents and operators follow the Code. The investigation was done covertly, without the knowledge of the staff involved.

Research International was commissioned by TRL to conduct the fieldwork. The investigation included travel agents, tour operators and airlines. It covered enquiries made face-to-face, by telephone and using the internet.

The following scenarios were used:

- a non-disabled person booking a trip to travel with a disabled person
- a disabled person booking a trip to travel with one other person
- a family or party with disabled members
- a self-reliant disabled person travelling alone.

A range of disabilities were covered including:

- vision impairment
- hearing impairment
- cognitive impairment
- wheelchair user
- difficulty walking 500m unaided.

The 'mystery shoppers' included wheelchair users, vision impaired people, deaf and hearing impaired people and people who have difficulty walking 500m unaided. Some 'mystery shoppers' made the enquiry alone; others were accompanied by another interviewer.

When making the enquiry the 'mystery shoppers' were not given a specific holiday or flight but advised to enquire about the booking procedures for a one week holiday in Spain, Italy or Cuba in June (flights and accommodation or flights only).

Due to the costs involved, 'mystery shoppers' were unable to actually make a booking. However, it is quite common for clients to make enquiries about procedures before booking a trip.

In 2005, the face-to-face visits took place in Cardiff, South Glamorgan, Hampshire, Surrey, Middlesex, South Yorkshire, Doncaster, Wiltshire, Bristol, Bath and Somerset, Tyne and Wear, Middlesbrough, Norwich and Bedfordshire.

The stores were located in city centre and rural locations. Branches of large travel agency chains and independent travel agents were visited.

The telephone and internet enquiries covered travel agencies (entirely internet based and those with High Street branches), tour operators and airlines.

'Mystery shoppers' recorded on an assessment form whether, at any point during the booking procedure, the travel agent, operator or airline asked them questions related to recommendations in the Code. In some cases the shopper would prompt questions.

'Visit information' was also recorded on the form, which differed depending on the nature of the assessment. For the face-to-face assessments, mystery shoppers rated whether the entrance to the store was easily accessible to wheelchair users, i.e. that there was step-free access, the entrance was sufficiently wide, and whether or not the height of the counter was appropriate for wheelchair users. For the internet assessments, mystery shoppers were asked to record whether they had to register on the travel agents' websites in order to start the booking process, whether there was an obvious facility for on-line help and whether there was a helpline number to call.

In addition, TRL contacted a sample of companies, including those in the telephone assessments, to enquire if they had a textphone. The internet site of the companies included in the internet assessments were also visited to see if it displayed a logo to indicate the website conformed to an accessibility standard (W3C[2], Bobby approved or RNIB See it Right approved).

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[2] World Wide Web Consortium (W3C) Web Accessibility Initiative guidelines

2.4 Survey of disabled passengers

To examine whether the experiences of disabled passengers had changed since 2004, a survey of disabled people travelling by air was repeated.

The 2004 survey had involved disabled people travelling between February and July 2004, whilst the 2005 survey included people travelling between June and September 2005.

The survey included passengers who have difficulty walking 500m unaided, wheelchair users, vision impaired people and people who are deaf or are hearing impaired, as well as those with a learning disability. As some passengers who require assistance at the airport may not consider themselves 'disabled', such as older people who cannot walk long distances at the airport, the invitation highlighted that the survey also applied to them.

Participants for the 2005 survey were successfully sought through a number of different organisations, including:

- three travel agents/tour operators;
- three airport operators;
- 25 organisations representing disabled people; and
- personal contacts of the research team and those involved in the study.

Other organisations were also approached but did not provide participants for this survey. This included 13 groups for disabled people, one tour operator, one airline and six airport operators.

Each organisation distributed information sheets to disabled air passengers describing the study. If the passenger was interested in taking part, they completed a consent form giving permission for the organisation to pass on their contact details to the research team. Other passengers contacted the research team directly. In some cases the disabled person's carer, who had accompanied the person on the flight, took part.

The participants were then contacted by the research team to arrange interviews. A questionnaire was usually administered over the telephone by an interviewer. A self-completion questionnaire was also available for participants who could not be, or preferred not to be, interviewed over the telephone. The self-completion version of the questionnaire was available in electronic and paper format.

The questionnaire covered all aspects of the journey from booking the flights, departing from the airport, the flight and arrival back at the airport.

3 Findings

3.1.1 Mystery shopping study

Altogether, 195 assessments were conducted via travel enquiries by people with, or who are travelling with, disabled people, covering 158 different travel agents, tour operators and airlines. Fully trained interviewers conducted 95 of the assessments face-to-face in the offices of the travel agent/operator, 30 over the internet and 70 over the telephone.

In the face-to-face assessments, mystery shoppers were either an non-disabled person travelling with a disabled person, a disabled person travelling with one other person, a self-reliant disabled person travelling with a party of disabled passengers or a self-reliant disabled person travelling alone. In all 30 internet assessments and the 70 telephone assessments the mystery shopper was a non-disabled person travelling with a disabled person. However, as with the face-to-face assessments, the internet and telephone assessments were structured to cover 5 broad categories of disabled people including deaf or hearing impaired people, vision impaired people, people with learning disabilities, wheelchair users, and people with difficulty walking 500m unaided.

3.1.2   Disabled passengers

Feedback on a flight taken between June and September 2005 was provided by 132 disabled passengers. Table 3 shows the number of passengers with various types of disability in 2004 and 2005. Note: As some disabled passengers have more than one disability the numbers do not total 132 (2005) or 95 (2004).

Table 3: Passengers' disabilities (multiple disabilities allowed)

Disability	Number in 2004	Number in 2005
Passenger has difficulty walking long distances and up stairs (i.e. may need wheelchair assistance to get to the gate and an ambulift to board an aircraft on a remote stand)	27	28
Wheelchair user who needs assistance at all times (i.e. requires assistance to the gate, boarding (including lifting into a seat) and use of the on-board wheelchair; travels with an escort)	24	43
Passenger has difficulty walking long distances but can walk up and down stairs and within the aircraft (i.e. needs wheelchair assistance to get to the gate but can walk up the stairs to board an aircraft on a remote stand)	13	22
Wheelchair user who needs to use on-board wheelchair but can travel around the airport independently (i.e. needs to use an on-board wheelchair but can transfer him or herself to/from seat)	11	7
Passenger is deaf or has a hearing impairment	10	15
Passenger has a vision impairment	9	28
Passenger has a cognitive impairment (i.e. difficulty with memory, concentration, understanding, reading or speaking)	5	8
Temporary disability – arm in brace, only able to use one hand	1	-

The passengers flew from a range of airports within the UK (see Table 4), via domestic, short-haul and long-haul international flights to numerous destinations, as shown in Table 5.

Table 4: UK airports passengers flew from in 2005

Airport (Terminal if known)	Total passengers in 2005 (000s)*	Number of passengers in survey
Belfast	4,824	3
Birmingham (Terminal unknown)	9,381	19
Bristol	5,254	5
Cardiff	1,778	1
Durham	900	1
East Midlands	4,184	4
Edinburgh	8,457	3
Gatwick (North)	32,777	4
Gatwick (South)	8,793	7
Gatwick (Terminal unknown)	2,610	9
Glasgow	4,411	7
Leeds Bradford	1,996	1
Liverpool	67,913	2
London City	9,148	1
London Heathrow (Terminal unknown)	21,999	23
London Luton	22,403	6
London Stansted	5,201	13
Manchester (Terminal unknown)	2,408	17
Newcastle	1,836	3
Prestwick	4,824	1
Southampton	9,381	1
Missing	-	1

* A 'small' airport is classified as having less than 3 million passengers, a 'medium' airport has between 3 and 15 million passengers and a 'major' airport has more than 15 million passengers per annum

Table 5: Location passengers were flying to in 2005

Flight	Location	Number of passengers
Domestic	Belfast	4
	Birmingham	3
	Derry	1
	Dublin	1
	Dundee	1
	Edinburgh	3
	Gatwick	1
	Glasgow	1
	Guernsey	1
	Heathrow	8
	Inverness	1
	Jersey	1
	Liverpool	1
	Luton	1
	Manchester	2
	Newcastle	2
	Newquay	1
	Stansted	1
Short-haul international	Fuerteventura, Canary Island	1
	Gran Canaria, Canary Island	1
	Lanzarote, Canary Island	1
	Tenerife, Canary Island	8
	Pathos, Cyprus	2
	Unknown, Cyprus	1
	Aarhus, Denmark	1
	Copenhagen, Denmark	1
	Unknown, Denmark	1

	Faro, Egypt	3
	Biarritz, France	1
	Ryes, France	1
	Cologne, Germany	1
	Hanover, Germany	1
	Tagel Berlin, Germany	1
	Athens, Greece	1
	Crete, Greece	1
	Kavos, Greece	1
	Kefalonia, Greece	1
	Santorini, Greece	2
	Milan, Italy	1
	Pescara, Italy	1
	Verona, Italy	1
	Unknown, Malta	2
	Amsterdam, Netherlands	4
	Oslo, Norway	2
	Alicante, Spain	3
	Almeria, Spain	1
	Bilbao, Spain	1
	Costa, Spain	1
	Jerez, Spain	1
	Malaga, Spain	5
	Murcia, Spain	1
	Palma, Spain	4
	Geneva, Switzerland	1
	Zurich, Switzerland	1
	Unknown, Tunisia	1
Long haul international	Brisbane, Australia	1
	Melbourne, Australia	1
	Sydney, Australia	1

Unknown, Bermuda	1
Kingston, Canada	1
Toronto, Canada	2
Unknown, Canada	1
Bergamot, USA	1
Dallas, USA	1
Dulles, USA	1
Hawaii, USA	1
Las Vegas, USA	1
Newark, USA	1
Orlando, Florida, USA	2

The UK airlines that passengers flew with in 2005 included:

- Britannia Airways
- British Airways
- BMI
- BMI baby
- easyJet
- Excel Airways
- First Choice Airways
- Flybe
- Monarch
- My Travel
- Scot Airways
- Thomas Cook
- Virgin Atlantic

Passengers that flew with a non-UK airline were excluded from the analyses for the in-flight section.

3.2 Presentation of findings

The interviews with airlines and at airports collected narrative rather than numerical data, so the analysis of the data was based upon identifying areas of the Code that had changed and the reasons why.

Percentages have been used to present findings from the disabled passenger survey and mystery shopping study, which allows comparison with 2004 data. However, due to the sample sizes, it may be misleading in some cases to quote such figures as percentages. When interpreting the findings of the survey, it is therefore necessary to consider the reported percentages in terms of the number of respondents answering the individual question. Throughout this report, percentages have been calculated using the number of respondents who actually answered the particular question item as the base number. This is shown as n.

3.3 General principles

3.3.1 Taking responsibility for meeting the needs of disabled people

In 2004 the airports that responded to the survey appeared less aware than airlines that all their staff had a responsibility for meeting the needs of disabled people. This issue was explored in interviews with airport operators in 2005.

The interviews with airport operators revealed that managers with an accessibility role felt that responsibility extended from senior management to staff working in public areas and information desks. However, the interviews with other members of management, such as commercial and retail managers suggested that they were not always aware of this responsibility. At the smaller airports responsibility for meeting the needs of disabled people tended to lie with management and was not considered the responsibility of public facing staff.

Those airports with a person with specific responsibility for accessibility tended to provide a more comprehensive service than others. This person was able to facilitate working groups, organise and disseminate training and awareness, audit the facilities and provide a central reference point for all disability-related matters. Airports without a person in such a role were less likely to form working groups and there appeared to be less awareness among staff and collaboration between departments.

3.3.2 Company review of policies, procedures and practices

Since October 1999 service providers have been required to change any practice, policy or procedure which makes it difficult or unreasonably difficult to use the service under Part 3 of the DDA 1995. The Code, therefore, encourages companies to review their policies, procedures and practices to ensure that they meet the needs of disabled people.

The survey of airlines and airports completed in 2004 indicated that companies had undertaken reviews. The reviews at airports mostly covered physical access to buildings and facilities, whilst airlines focused upon service issues e.g. emergency procedures, operational manuals, evacuation arrangements and safety information.

The 2005 interviews with airlines and airports suggested that this was still the case. Since the survey, airports had tended to focus upon meeting their new duty introduced under Part 3 of DDA 1995 which requires them to take reasonable steps to ensure disabled people can physically access the airport. In some cases the reviews had led to the development of a specific disability access policy. These were often developed in conjunction with the parent company so covered all airports within the group. The policy for one group emphasised the need for:

- A high level of customer service
- Compliance with disability legislation
- Equality for disabled passengers
- Fully informing disabled passengers of facilities
- Consultation with disability related groups where possible
- Encouraging feedback
- Monitoring and reviewing airport and business partners
- Auditing facilities and infrastructure.

Another common area of review among airports was assistance provision in response to proposed EC legislation[3]. At some airports this had led to the postponement of measures to improve assistance until the outcome was confirmed. Airport operators were often keen to assume full control of assistance, as the following comment illustrates:

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[3] COM (2005) 47 Final – Concerning the Rights of persons with reduced mobility when travelling by air

"if we do take over assistance we could provide a better service, with better equipment and better trained staff, and we would have audit trails for training and so forth." [Airport operator]

This airport felt that the changes would give them greater influence than they currently have over the handling agents operating on their premises.

The Regulation will place a legal requirement on airport managing bodies to organise central provision of assistance for PRMs to enable them to board, disembark and transit between flights. The objective of the Regulation, is the delivery of a uniform, seamless and high quality service to all PRMs across the European Union. Most of the provisions will enter force two years following the publication of the final Regulation in the Community's Official Journal, although the provisions on non-discrimination will take effect after one year.

The main aspects of the new Regulation are:

- no person to be refused carriage on a commercial flight starting or finishing within the European Community on the basis of their disability or reduced mobility, subject to legitimate considerations of air safety;

- a legal requirement on the managing bodies of airports handling commercial passenger flights to organise the provision of the services necessary to enable PRMs to board, disembark and transit between flights;

- for airports handling more than 150,000 commercial passenger movements per annum, a requirement on the managing body to set quality standards for the service, in co-operation with airlines and bodies representing disabled people;

- the possibility for airports to provide the services themselves, or to contract with another body, including an airline, to provide them, with the possibility of an airline initiating the contracting process;

- provision for the airport managing body to recover the costs of the service through a charge on airlines proportionate to the total number of passengers they carry to and from the airport;

- a requirement that such a charge shall be reasonable, cost-related, transparent and established in co-operation with airlines, and that

information on costs and charges shall be made available by airports to airlines using the airport and to national enforcement bodies;

- a requirement on Member States to set up a body or bodies to enforce the rights of PRMs, with the possibility that this body or bodies, or another body, may oversee the application of the charging regime;

- various provisions concerning notification and information exchange aimed at ensuring the smooth operation of the service to PRMs.

The provision of assistance will, under the regulation, become the responsibility of the managing body of the airport (airlines will contribute to the cost according to the total number of passengers they carry).

Airports will be required to make assistance available provided that the disabled person has given the required notice (48 hours) and that they arrive at check-in or a designated drop-off point at the time stipulated in advance and in writing or a minimum of 1 hour or 2 hours, respectively, according to their arrival point.

In circumstances where advance notice is not given the managing body will have to make all reasonable efforts to provide assistance.

The interviews with airlines found differences in the approach taken to their reviews. Airlines were either constantly reviewing their policies, practices and procedures against the Code; undertaking more general reviews; or responding to trends in the industry, for example, with the carriage of assistance dogs or minimising wheelchair damage. Changes were also prompted by customer feedback and internal audits. An example of a policy change made by one airline was to increase the proportion of disabled passengers allowed on a flight to 50%, which enabled the airline to take large groups to certain destinations. Other airlines did not have a limit on the number of disabled passenger that could be carried.

The interviews also suggested that some airlines' policies, practices and procedures were less well developed than others and tended to be limited to issues covered by regulations, such as safety. The interviewee was not always familiar with the company's policies, procedures or practices.

Internal working groups were used by both airlines and airports to review and develop policies, procedures and practices. At airports these

working groups tended to involve business partners, such as handling agents, representatives from commercial and retail outlets and airlines. The aims of the working groups were to enhance awareness of disability related legislation and the Code and to create *"one smooth process"*. Other airports disseminated action plans produced following access audits or accessibility standards for service and infrastructure to guide all organisations at the airport.

Rather than use landlord powers to exert influence over their business partners (e.g. franchisees), airports preferred to highlight deficiencies, such as a lack of dual-height counters or induction loops, and encourage them to make changes through working groups and standards or guidelines. However, despite procedures to increase accessibility at the airport there were occasions when business partners did not follow them. For example, one airport described their frustration when an outlet refitted its premises without seeking their assistance or prior approval and introduced a new facility with no induction loop, dual-height desks, poor circulation space and reflective surfaces.

An airport that had not taken any steps since the 2004 survey to encourage business partners to address the needs of disabled people believed that this was due to an *"ignorance"* of accessibility within the airport. The airport did not currently offer disability awareness or equality training for its staff and, compared to other airports, there was a lack of internal communication and working practices designed to disseminate knowledge of accessibility and responsibility. The airport was, however, in the process of developing a disability awareness course so the situation should improve.

Access audits were used by all the airports interviewed to assess their service and/or infrastructure. Airlines were less likely to have commissioned an access audit in the last 18 months.

All the airport operators interviewed in 2005 said that they had audited their infrastructure and/or service to some extent since the audit undertaken as part of this project in 2004. These were either conducted internally or externally. Interviewees explained how internal audits were carried out: some used a check-list provided by the parent company or developed from standards such as BS 8300; others had a less formal approach and undertook regular tours of terminal facilities to identify any problems as part of a *"fluid improvement strategy"*.

The findings of these audits were used to produce an action plan for the airport and to prioritise change. A series of design standards to ensure clarity of design in new projects and consistent retrospective development of older areas had also been developed using the findings.

Airport operators explained that it was not always easy to translate the findings of an audit into action due to a lack of reference points and costs within the audit findings.

To illustrate how audit findings had been translated in actions, one airport operator described how they produced a matrix using the key points extracted from both audits and categorised them according to which area of the airport held responsibility for each item and whether remedial action could be taken as part of regular maintenance. If not, items were listed for costing to assess how 'reasonable' it would be to make adjustments. The matrix was then developed into a progress monitor.

3.3.3 Design and refurbishment of terminals and aircraft

The 2004 survey indicated that all airports who responded to the survey met the Code's recommendation to consider the needs of disabled people when planning new buildings or refurbishing old ones. How the airports had considered the needs of disabled people were explored in the interviews with airport operators in 2005.   Generally, the airport operators consulted with local disability organisations during the design and implementation of new facilities and equipment. The airport operators gave examples of staff from the local organisations being invited to tour the terminal building and offer feedback; special assistance customers invited to view facilities and participate in focus groups; or the Local Authority access officer asked to view new facilities. Organisations representing disabled people may also be invited at an earlier stage to work with architects or were consulted on plans.

Other airport operators did not consult directly with disabled organisations but followed standards or regulations covering the needs of disabled people, such as BS 8300[4] or Part M of the Building Regulations (in England and Wales).   The best practice documents referred to in the Code were not usually closely followed, such as Inclusive Mobility (DfT, 2002). The interviews indicated that some airports followed their own standards that they had developed or were in the process of developing.

When commissioning new projects, airport operators instructed architects to consider the needs of disabled people. New developments were subject to an approval process by the airport operator and at some

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[4] 'Design of buildings and their approaches to meet the needs of disabled people – Code of Practice'. **BS 8300: 2001**.

airports an on-going review process of how effectively accessibility guidelines were being implemented was in place.

The interviews with airport operators found that commercial pressures also influenced the design and could, potentially, lead to accessibility being compromised at an airport. For example, one airport was considering placing security search on a mezzanine level to generate greater commercial space. They commented:

> *"Purists are saying 'keep everyone on one level, it's much simpler but commercial want to maximise spending. If security moves to a less convenient location, then so be it – as long as access is provided" [Airport operator].*

Few airlines had refurbished or commissioned new aircraft in the last 18 months so were unable to provide examples of how the needs of disabled people were considered in their design. The airlines explained that commissioning and refurbishment of aircraft is carried out over several seasons so the impact of the Code was unlikely to be evident at this stage.

It was a common view among airlines to state that it was the responsibility of the manufacturer to consider the needs of disabled people and they had very little influence over the design, as the following comment illustrates:

> *"As an operator we purchase aircraft which are 99% built as standard and then have a 1% we can influence based on operation. [I] presume disabled people are taken into account in new designs by manufacturers" [Airline].*

The options available tended to be for seats, seating configurations and a choice of upholstery fabrics and carpets. The cost of requesting 'bespoke' changes was considered expensive and prohibitive. However, other airlines were working with manufacturers to improve the design of aircraft (the design of toilets, for example) and were incorporating the recommendations in the Code where possible (see Section 3.9).

The views of major aircraft manufacturers were sought as part of this project. A response was received from one major manufacturer, who indicated that they were unfamiliar with the Code but said they would meet customer requests for the accessible features it recommends. The manufacturer had been working with a national research centre to improve the accessibility of their aircraft.

Some airlines said they were restricted in the changes that could be made by leasing agreements. Under these agreements the leased

aircraft had to be returned in the same state as it was received. This prohibited some changes being made.

Organisations representing disabled people were consulted by larger airlines for advice on the whole journey, or aspects of the journey such as aircraft design or training. Customer feedback was also considered and changes made where appropriate.

3.3.4 Cost of providing assistance

All airports and airlines responding to the 2004 survey stated that the cost of providing assistance was not passed on to disabled people. Airlines covered the cost of assistance from check-in and the airport operators said they covered the cost of assistance prior to check-in. One airline, however, thought that the disabled passenger funded assistance prior to check-in so could have misled some customers.

The survey of disabled air passengers in 2004 found that four people were asked to contribute towards the assistance they received; in 2005 only one disabled passenger reported that they incurred an additional charge (£8). This passenger booked directly and flew with a non-UK airline. They did not describe what the additional charge was for.

3.4 Training

3.4.1   Disability awareness and/or equality training

The 2004 survey had indicated around half of all staff employed by airlines and airports received disability awareness and/or equality training. In most cases the members of staff were public facing. The interviews with airlines and airport operators in 2005 indicated that, generally, those that had only offered training to staff who meet the public in 2004 had plans to extend training to all staff, although training of 'frontline' staff was given priority.

The airlines that had not responded to the survey in 2004 but were interviewed in 2005 had less extensive training programmes. Two of the five airlines only offered disability awareness training to cabin crew, whilst the others did not offer training to any staff. The reasons given by airlines for not providing disability awareness training to any staff were:

- the airline had documents in place which described company's disability policies and procedures and these were available to staff;
- the airline provided general customer service training, which they believed made disability awareness training unnecessary; or

- the airline did not see what could be gained from such training.

Another explanation for not providing training given by an airport operator was:

> *"staff [are] mainly desk based and not normally asked to assist".*
> *[Airport operator]*

This comment suggests a lack of awareness that meeting the needs of disabled people transcends all levels within an organisation. The airport had, however, sourced a video to incorporate into a new training programme to cover disability equality and awareness.

Since the 2004 survey, a number of new initiatives had been introduced by airlines and airports. These included updating training videos, introducing a computer based training package or providing refresher disability awareness training (usually annually).

Other initiatives included the introduction of a voluntary NVQ in customer service, which was being piloted by five staff at the time of the visit, and funding training in sign language. The interviews indicated that some airlines and airports were actively reviewing their disability awareness and/or equality training, as demonstrated by the following comment:

> *"We do work constantly on providing appropriate training; we will*
> *trial a provider, and if they do not meet our needs, we won't just*
> *stay with them, we will move on." [Airport operator]*

A permit system, whereby staff will not be given a pass to work at the airport until disability awareness and/or equality training has been completed, as with other mandatory safety training, was being considered.

The training packages used by airlines were often generic and not specific to the air travel industry. They tended to cover barriers faced by disabled people and suggestions for removing them, the range of disabilities, communication, how to deal with unexpected occurrences and the DDA. Skills needed to lift or search disabled passengers were not usually covered by generic courses. The training often consisted of a video or e-learning module (computer package) which meant a greater number of staff could be trained cost-effectively. Other courses, usually for cabin crew or staff providing 'meet and greet' services, included practical training. The airlines that had developed new refresher courses had incorporated role play to demonstrate the barriers disabled people may face.

The courses developed by the airports interviewed in 2005 tended to cover the topics suggested by the Code, including skills for searching,

escorting and communicating with disabled passengers, dealing with unexpected occurrences and awareness of the DDA. The courses were often practical, so the airports had adopted a cascade training approach, where training was delivered to trainers first, with the aim of cascading the information downward to other staff. The quality of this training may, therefore, vary. A video had been produced by one airport group for its staff and another had provided a pocket-sized guide for assisting disabled customers to its entire staff in addition to training.

It was common for the airports interviewed to offer their training package or video to business partners at the airport. This included security staff, handling agents and fire service staff. As one airport operator explained:

> *"come the time, there could be something happening and [staff] need to be aware. When you've got an airport pass on, you're like a one-man information desk. So in that way, you are responsible."* [Airport operator]

This offer of training helped address some of the concerns about the cost of addressing accessibility issues that some smaller business partners had.

Similarly, some airlines had had an input into the training provided by their handling agents by providing a copy of their company's training notes or a video, giving them the opportunity to participate in the company's training programme. Airlines also provided information on the dimensions and capabilities of their aircraft, such as aisle width, that should be used in training or issued manuals for sub-contracted handling agents incorporating aspects of the Code. Some airlines stipulated the content of training they expected handling agents to provide, including wheelchair handling and passenger types and needs. Other airlines felt that training for subcontracted handling agents was "*up to them to sort out*".

The training offered by business partners had also been monitored by airport operators. This had involved, for example, requesting that all business partners provide detailed statements about the disability awareness and equality training they offer and informal questioning of staff. The audit found a lack of formal training so the airport offered to assist with the creation of training documents and introduced a deadline for business partners to implement training. Other initiatives included requiring contractors as part of the tendering process to demonstrate that their customer service and training policies took account of the needs of disabled people; showing a video to potential retailers to assist them in understanding the objectives of the airport, before they submit proposals; and presenting access issues to business partners. These

initiatives were intended to encourage business partners to become more responsible for meeting the needs of disabled people and establishing an ethos at the airport.

The training provided by handling agents is considered in more detail in Section 3.4.2.1.

In 2004, comments made by the 'mystery shoppers' had suggested there was a lack of awareness and confidence among travel agents and tour operators in meeting the needs of disabled people. Similar comments were made by the 'mystery shoppers' in 2005. In particular, it was reported that members of staff did not probe about their needs or were not aware of the assistance that could be offered.

The 2005 'disabled passenger survey' respondents also commented on poor standard of knowledge of staff taking bookings:

"Very bad - travel agent didn't have any information or knowledge about assistance" [Disabled passenger]

"Poor - they were completely unaware of what assistance was available at the airport" [Disabled passenger]

3.4.2 Specific training for staff who may be required to provide services for disabled people

3.4.2.1   Handling agents' training

In the 2004, airport operators and airlines provided information on the training provided by their sub-contractors. They indicated that most of the staff providing services for disabled people had specific training. In 2005, this information was sought directly from handling agents working at the airports visited. A total of six handling agents, representing four companies, were interviewed. The handling agents provided check-in services for airlines and/or assistance provision for the airlines or airport operators.

The interviews with handling agents indicated that some organisations had incorporated disability awareness and equality training into their training programmes, whilst others had not. There was a perception among some handling agent managers that disability awareness and/or equality training replicated aspects already covered by their course.

Since the 2004 survey one organisation had introduced a corporate training package, although it had not been used at all the airports the company operated from.   It was developed to cover relevant legislation and guidance, such as the Code, and should be delivered by centrally

trained trainers to ensure standardised service. The training covered assisting and communicating with disabled people and how to sensitively question passengers to gauge assistance needs at check-in, based on how they would cope with distances to gates and obstacles such as aircraft steps. The company aims to offer refresher training at annual or six monthly intervals. The handling agent that had used the package commented that, "*since the new training was introduced, the standard of service has noticeably improved*". This was based on a reduction in customer complaints despite a rise in the turnover of assisted passengers.

The interviews revealed that training was not standard within companies between airports. It appeared training could be adapted locally to suit the business needs for that particular airport and disability awareness and/or equality training was not always included.

The training for check-in staff differed from that for assistance providers, as it was unlikely to cover lifting or guiding. The training concentrated upon how to establish any assistance needs and to be aware that some assistance needs will not be immediately obvious or physical ('hidden' disabilities). In some cases this training was informal, as one handling agent explained:

> *"We don't really train [our] staff to look for specifics – if you're asking if there is a particular document or course that we follow to do this, no, there is not." [Handling Agent]*

The training offered to assistance providers at induction tended to be more extensive than refresher training and it was at this time that disability awareness training was most likely to be included. The training was focused upon manual handling skills to ensure the health and safety of staff.

Feedback from disabled passengers in 2004 suggested that communication between staff and passengers being assisted could be improved. The handling agents interviewed acknowledged the importance of communication but may have only trained their staff to a limited extent as the following comments illustrate:

> *"Communication is important and we encourage our staff to talk to all passengers, regardless of disability. If you're lifting someone you need to know where they hurt and how they'd like to be lifted." [Handling agent]*

> *"Training does cover communications with passengers who have a range of disabilities but, to be perfectly honest with you, it probably*

doesn't [go far] enough. Obviously courtesy is an essential quality and we put this through to our staff at all times."[Handling agent]

The training covered those issues raised by the disabled passengers, such as:

• talking to wheelchair users at their eye level;

• asking the person how they would like to be assisted;

• describing what the assistance process will involve before and during the delivery of the assistance;

• monitoring passenger comfort at all times;

• asking passengers how they would like to be lifted; and

• never discussing the assisted person with a third person (unless direct communication is not possible).

Most of the training offered was practical, using role play situations and providing staff with opportunities to shadow colleagues providing assistance. Other less common approaches included computer based training. For example, one company had introduced a new computer based disability awareness training module since the 2004 survey that had become a mandatory part of induction for frontline staff and management. This module addressed issues such as how to communicate with disabled people. The training module was corporate wide and so used across the whole organisation.

3.4.2.2 Cabin crew training

The 2004 survey found that all seven airlines that responded to the survey offered training to cabin crew and four airlines had trained all their cabin crews. Airlines explained in the 2005 interviews that training for cabin crew differed from that for other staff. It could include basic sign language, for example.

The training did not always cover some of the assistance that the Code says should be available, such as cutting up food. Airlines not providing this assistance felt it came under self-sufficiency rules that the passenger must be able to feed themselves. Staff would, however, assist vision impaired passengers with opening packages and used the 'clock method' to describe the contents of the tray.

Airlines that did not assist wheelchair users to and from the toilet, explained this was either because an on-board wheelchair was not supplied or they cited health and safety reasons.

3.5 Pre-journey

3.5.1 Information about services

The 2004 survey had explored whether pre-journey information about services provided by airports and airlines was available in accessible formats. It found that, whilst information was generally written in plain English and used illustrations where appropriate, publications were not available in alternative media such as Braille, large print, audio cassette or on computer disk. It should be noted that the DDA requires reasonable provision, whereas the Code requires that reasonable steps are taken to ensure that both general information and specific information relating to services for disabled people is provided in accessible formats.

The interviews with airport operators and airlines found the situation was largely the same. Generally, both airlines and airport operators felt providing information in alternative media was not necessary because they had had few requests or the information can be provided on the website or over the telephone. Website accessibility is considered in Section 3.5.2.

Since 2004, there had been a number of changes to information provision at the airports visited in 2005. An exceptional change was the introduction of a new system for providing information in alternative media – requests were dealt with on an individual basis to reduce the cost of providing information in alternative media in advance that was not used. More common changes included the introduction of a new special assistance brochure for disabled customers and updated content in general information booklets.

Airlines did not usually provide separate information brochures specifically for disabled people. The exception was a booklet detailing an airline's assistance dog policy introduced since the 2004 survey.

If pre-journey information was available from an airline it was often incorporated into the 'small print' terms and conditions section of the tour operator's brochure. The airlines interviewed explained that the tour operator was responsible for the wording and brochure production. The wording usually directed the customer to contact a telephone helpline.

A new initiative recently introduced by an airline was the production of a business card to hand to passengers, asking them to telephone the airline if they have any special requirements (including meal requests). However, when asked who disseminated the card or where it is available

to passengers, the interviewee thought they were available at check-in,
i.e. too late for advance notification.

3.5.2 Websites

Airports and airlines tend to use their websites to provide information for
disabled people and the interviews found that website accessibility was
an area that had improved since the survey in 2004.

Airport operators had worked to achieve at least Level 1 of the W3C
accessibility criteria and some had been accredited and displayed the
W3C logo. The content of the website had also been reviewed and
tended to provide information on assistance and car parking for disabled
people. Some also provided information on airport facilities such as
induction loops, accessible toilets, help points, public transport
interchanges and contact information for those disabled people needing
further information or advice, or wanting to pre-book assistance to get to
check-in.

In 2004 none of the airlines met Level 1 of the W3C accessibility criteria.
The situation in 2005 had improved with some airlines working towards
and achieving this level, although none had been accredited or displayed
the W3C logo. External consultants were often used to advise the airline
about design. The content of the website had been reviewed by many
airlines and additional information on policies and special requirements
relevant to disabled passengers had been incorporated.

It was rare for changes to be made to the on-line booking engine to
enable the user to pre-book assistance on-line. An airline that had
introduced this facility explained that this had reduced the number of
calls and therefore costs to their call centre. Airlines without the facility
explained that they needed to discuss with the passenger their needs or
said they "*don't want to worry people*".

Other airlines interviewed indicated that they intended to improve their
website accessibility; others were waiting for regulations and did not
want to incur costs by following best practice that was not adopted as the
UK standard. In some cases the airline felt that their website already
achieved a high standard compared to others in the same industry so a
change was unwarranted. There was also a misperception that websites
that did not incorporate a booking engine did not need to be accessible.

A review of the 30 websites used in the 2005 mystery shopping internet
assessments found that one displayed the W3C logo and had a Level 3
(AAA) rating. Four others had worked to achieve Level 1 or 2 of the
W3C accessibility criteria but did not display the W3C logo. None of the

websites assessed as part of the 2004 mystery shopping survey had received W3C accreditation in the last 18 months.

3.5.3 Booking arrangements

The Code encourages staff taking a booking to ask all customers whether anyone in their party will require assistance at the airport and/or in flight. The interviews with airlines and handling agents both revealed that advance notification of assistance needs is required in order to provide an improved service for disabled people at the airport or on board the aircraft.

In 2004, the mystery shopper study found that few members of staff or booking systems enquired, unprompted, whether or not someone in the party had a disability at the time of booking, especially in telephone or internet assessments. However it should be noted that the mystery shoppers made pre-booking enquiries rather than actual bookings. All 17 mystery shoppers that were asked the question were carrying out face to face assessment in a travel agency and/or tour operator's office.

Some of the larger airlines interviewed had introduced measures to increase the proportion of passengers informing the airline that they required assistance or had special needs. This included:

- instructing tour operators linked to the airline to establish whether assistance was required at booking by asking or 'observing', and usually involved updating manuals or guides for tour operators and travel agents on communicating information about passengers' assistance needs to the airline.

- introducing prompts within the airline's computer booking system instructing staff to establish whether assistance would be needed.

- creating a flowchart and frequently asked questions sheet for special assistance representatives.

- updating the airline's website to inform passengers booking a flight to contact the airline by telephone if they required assistance, or introducing an on-line assistance booking facility.

ABTA has also promoted the Code amongst its members and asked them to ask all customers if any member of their party requires assistance.

The 'mystery shopping' study and disabled passenger survey data were investigated to see if there had been an increase in the proportion of customers reporting being asked if anyone in their party requires assistance, since 2004. It should be noted these studies were not limited

to those companies that had stated that they had introduced changes to increase the number of passengers pre-booking assistance.

The analyses of the disabled passenger survey found that a lower proportion of disabled passengers reported that they were asked this question in 2005[5]. There was also a statistically significant decrease in the proportion of passengers who said they pre-booked assistance for airport and/or flight between 2004 and 2005[6]. This difference could be due to a lower proportion of people pre-booking assistance who said their flight was booked at a travel agency in 2005[7]. However, there was no statistical difference between the proportion booking their flights themselves and pre-booking assistance[8].

The mystery shopper study also found a decline in the proportion of staff enquiring about disability or needs. In 2005 the proportion of mystery shoppers asked if anyone in their party had a disability decreased significantly from 35% to 6% of the face to face assessments. Even when the sample was restricted to face to face assessments with companies that took part in the mystery shopping study in both years, there was still a statistically significant decrease from 31% (10 of the 32 assessments) in 2004 to 6% (3 of the 49 assessments)[9] in 2005.   None of the mystery shoppers booking by telephone were asked if they had a disability in 2004 or 2005, whilst five mystery shoppers were asked this question booking using the internet in 2005 and none were asked in 2004. This increase was not statistically significant.

There was also no increase in the proportion of mystery shoppers asked if anyone required assistance at the airport, if anyone required assistance in-flight or if any member of the party would have difficulty walking 500m.

When the mystery shopper prompted the member of staff about their disability and whether their journey could be made any easier, the member of staff advised the customer to contact the airline directly. This practice is encouraged by the airlines. A similar finding was found in 2004.

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[5] 58% of those booking themselves in 2004 compared to 36% in 2005, Chi-square = 6.22, $p<0.05$
[6] 84% of all respondents in 2004 and 67% in 2005, Chi-square = 7.65, $p<0.01$
[7] 95% of those who booked their flight at a travel agency pre-booked assistance in 2004, this proportion fell to 44% in 2005, Chi-square = 12.47, $p<0.01$
[8] 79% of those booking themselves in 2004 compared to 73% in 2005, Chi-square = 0.74, ns
[9] Chi-square = 9.07, $p<0.01$

The interviews with some smaller airlines also suggests that they felt the *"onus is on the passenger to notify us about special requirements" [Airline].* In some cases, the airline said they would prefer to be notified in advance but did not feel it was necessary.

Generally, airlines preferred to speak to the passenger directly to discuss their needs over the telephone. Airlines usually had a dedicated member of customer service staff or a team that dealt with special assistance requests.

A conflict with a United States Federal Regulation (Nondiscrimination on the Basis of Disability in Air Travel), related to the Air Carriers Access Act (1986), was reported by a few of the airlines interviewed. They explained it was difficult to establish whether assistance is required without judging or discriminating against certain people within the terms of the Act.

General comments made by the disabled passengers suggest that some found the process complicated or confusing, especially to obtain assistance:

> *"Complicated process for older people – lots of phone numbers and addresses are provided to contact". [Disabled passenger]*

3.5.3.1 Internet bookings

The Code states that internet bookings should provide similar services to those of more traditional agencies; customers should be able to request assistance.

As reported in 2004, the 2005 mystery shopper study found that a facility for pre-booking assistance on-line was rare. In 20 of the 30 internet assessments the mystery shopper could not find any information for disabled people or about assistance on the website. Those websites that did offer information usually provided it outside of the booking facility and in two cases it was difficult to find. Three websites only covered wheelchair assistance and did not contain any information for people with a learning disability, vision impairment or a hearing impairment. There was a 'special information' box found as part of the booking facility on two websites that could be used to describe special dietary requirements or highlight assistance needs. The sample included on-line travel agencies, travel agencies with high street premises, airlines and direct bookings with tour operators. The ability to pre-book on-line is recommended by ABTA.

Section 3.5.2 discusses the changes made to airline's websites. Most of the airlines had not made changes to the on-line booking engine since

2004. To ensure customers were not discriminated against by not being able to obtain the same discount as those booking on-line, one airline had made sure the same discounts were also available over the telephone. There was a concern among the disabled passengers responding to the survey that on-line discounts were not available if they had to telephone to obtain assistance or book, so would have preferred to be asked about their disability on-line.

3.5.3.2   Telephone bookings

It is good practice for companies taking bookings by telephone to provide a Minicom[10] or textphone facility for deaf and hearing impaired people. The 2004 survey found that it was rare for airlines, travel agents and tour operators to provide this facility. This was still the case in 2005. Only one airline included in the telephone mystery shopping assessments had a textphone. None of the other airlines, travel agents or tour operators assessed had such a facility.

3.5.3.3   Recording requests for assistance

ABTA have produced a checklist to assist staff taking bookings establish whether assistance is required at the airport and/or in-flight. The 2004 survey indicated that the use of this form among travel agents and tour operators was low. . This was reflected in the mystery shopping findings that found only one (1%) mystery shopper had been told that they would complete the ABTA checklist if they went ahead with the booking. This number increased slightly to seven (4% of the ABTA travel agents and/or tour operators) in the 2005 survey. It is possible that this number might have been higher had the mystery shoppers made bookings. There was a concern among the disabled passengers that requests were not acted upon:

> *"Not helpful. Write things down but make no guarantees and seem to not action anything"*

> *"Ok at the time but later realised requests had not been acted on"*

The mystery shopping study also explored whether customers booking on behalf of someone else were asked if they had consent to pass on information about the disabled person's condition. Information about physical or mental health is considered 'sensitive personal data' under the Data Protection Act (1984). Therefore, paragraph 4.7 of the Code

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[10] Textphones are used by deaf people or those with speech difficulties. Unlike a standard telephone, a textphone has a keyboard and a display screen. Minicom is a widely used brand of textphone.

states that, where it is not genuinely possible to obtain the explicit consent of the actual customer to whom the sensitive personal data relates, it might be possible to obtain that consent from someone acting on their behalf.   Three mystery shoppers booking on behalf of a disabled person reported that they had been asked if they had consent to pass on information on behalf of the person in 2004. None of the mystery shoppers were asked this question in 2005.

3.5.3.4 Confirming requests for assistance

It is good practice for tour operators and airlines to confirm that requests for assistance have been received and acted upon. The 2004 survey found that three-quarters of the 65 tour operators and two charter airlines who responded to the survey provided confirmation.

The 2005 interviews with airlines found that the situation had altered slightly for the seven airlines that responded to the survey in 2004: an additional charter airline provided confirmation. The reason for not providing confirmation included the customer was booking directly with the airline or computer system difficulties.

There was no statistically significant difference between the proportion of disabled passengers receiving confirmation that their request for assistance had been received an acted upon in 2004 and 2005. In 2004 30% of those who had pre-booked assistance received confirmation compared to 37% in 2005. The majority of the confirmations in 2005 were from airlines (18 of the 27); nine were from travel agents; and one was from a travel operator.

3.5.3.5 Notice period required for assistance

In 2004, six of the seven airlines compliant with the Code's recommendation that an airline should deliver full assistance provided a minimum of 48 hours notice. They would all, however, accommodate requests from customers who had not pre-booked, booking a last minute deal or if there were changes to the flight. The airlines interviewed in 2005 that had not responded to the 2004 survey had similar policies.

Airlines explained that they communicated information about passengers to handling agents between 24 hours and 48 hours prior to the flight. To improve this process, new systems had been introduced by a few airlines since the 2004 survey that enabled their handling agent to access requests for assistance on-line or notified them via email.

The airlines and handling agents interviewed both said that a lack of advance notification can cause resource difficulties or mean the most

appropriate assistance cannot be provided because the passenger's needs have not been determined.   For example, appropriate lifting equipment may not available to help board the passenger in a dignified way if they are not informed in advance that the passenger cannot manage to walk up or down steps. It can also lead to delays for people who have pre-booked, as one airline explained:

> "Could get a situation where [you] know that five people coming of an aircraft need to be transported by buggy and the first five people off the aircraft jump in it so that those who requested it …have to wait or are left without" [Airline].

Airlines noted that requests for assistance for return journeys were greater, perhaps because the passenger realised the distances or difficulties involved.

Some details about passengers requiring assistance was communicated in advance to the cabin crew by airlines. This included the international codes used to request assistance or was limited to information about medical cases, such as passengers requiring oxygen or the use of a stretcher.

3.5.3.6 Requirements for escorts and medical clearance

The Code states that an escort or companion should only be required if a disabled passenger is not self-reliant and lists a number of criteria that should be used to determine whether or not a passenger is self-reliant. It also states that medical clearance should not be required if the safety and well being of the passenger, or that of other passengers, can be reasonably assured.

The 2005 interviews with airlines that responded to the survey in 2004 did not identify any changes in how the airlines determined whether a passenger is self-reliant or those who required medical clearance.

Those airlines that had not responded to the 2004 appeared unfamiliar with this part of the Code. The airlines did not have clear policies on the issues and so the interviewees were unsure in what circumstances an escort or medical clearance was required, or the criteria used to determine self-sufficiency.

Three disabled passengers in the 2005 survey were told they had to travel with an escort but all were already travelling in a party.

Even though the majority of disabled passengers were not told they must travel with an escort, many commented that they felt it would be 'too difficult' to travel alone.

3.5.4 Seat reservations

In 2004, the survey of airlines indicated that six of the seven airlines allowed disabled passengers to pre-book seats as suggested by the Code. However, not all airlines allowed all disabled passengers to pre-book. The circumstances in which a disabled passenger could pre-book were explored in the interviews. In some cases staff used their experience or judgement to determine if a passenger could pre-book a seat or if medical evidence was required.   Other airlines used the same terms and conditions for pre-booking seats as for non-disabled passengers, so pre-booking was only available on certain flights or could incur a charge.

Airlines that did not have a facility to allow disabled passengers to pre-book seats explained that they had no plans to do so because *'all the seats are the same'* or passengers are pre-boarded.

None of the airlines interviewed had revised their policy on this issue since 2004.

The mystery shopper studies in both 2004 and 2005 found that few mystery shoppers were offered the opportunity to pre-book seats and not all of those that were offered this facility were told their seat could not be guaranteed if there were operational difficulties. A similar finding was found in the disabled passenger surveys. In 2004 nine of the 36 disabled passengers who pre-booked seats were told their seat could not be guaranteed, whilst 11 of the 46 who pre-booked seats were informed in 2005.

In the majority of cases the pre-booked seats were available when the disabled passenger arrived at the airport. Only six of the 46 disabled passengers in 2005 said their seat was not available when they arrived at the airport, all of whom arrived at least two hours prior to the flight. Five were happy with the seat they were reallocated.

3.5.5 Additional seats

Some disabled people require two seats on the aircraft because of their disability. The Code suggests that airlines should offer the second seat at a discount on the full fare for that flight but recognises that discounts might not be available if flights are sold as part of package holidays. It also suggests airlines consider a discount on the full fare for an escort's seat if the airline requires the passenger to travel with one. The 2004 survey found this was not common practice and this situation has not changed in the last 18 months.

The Code acknowledges that airlines may need to restrict the number of bookings per flight of disabled people who require two seats; however, the survey of airlines in 2004 found this practice was rare.

The interviews in 2005 explored this issue further. The charter airlines confirmed that they cannot offer a discount for people who require additional seats for an escort or due to a disability and they had no plans to revise this policy because the seats are sold onto tour operators who then sell a whole holiday package. An exception was a charter airline that was considering sharing the cost with the tour operator. Scheduled airlines that did not offer a discount tended to report that there was no need for a policy as most seats were discounted already.   A 'no-frills' airline explained that their pricing structure was based upon demand and supply and could not be adapted to further discount tickets.

The discounts that were available from airlines ranged from 25% of the full price seat for an escort to 50% if the additional seat was required because of their disability. The discount for an escort was only available if it could be established the passenger was not already travelling with someone else.

This was reflected in the finding from the 2005 disabled passenger survey which found that none of the three disabled passengers who were told they needed to travel with an escort were offered the escort's seat at a discount. All were travelling in a party of people.

3.6 Arrival at the airport

3.6.1 By car

3.6.1.1 Car park facilities

A range of minor and major changes had been made to car parking facilities at the airports that were re-visited in 2005. The scale of changes made depended on how compliant the facilities were believed to have been in 2004 or whether they formed part of airport development plans. Some of the changes were the result of the airport operator's or the car operator's own access audit and these airports usually had made major changes. The changes focused upon parking for blue badge holders.

The most common issue that had been addressed was the number of reserved parking spaces for disabled people. The audits conducted as part of this project in 2004 had indicated that the car parks assessed

usually had a lower proportion of parking spaces reserved for disabled people than that recommended. The number of parking spaces for disabled people had been increased at the airport by remarking spaces in the car park or providing a new car park. In some cases an individual car park may still not have the recommended proportion of parking spaces reserved for disabled people for its size.

There was some concern among car park operators that the recommended proportion of car parking spaces for disabled people is too high, as many spaces are left empty. Car park operators are concerned about lost revenue and, in some cases, have the agreement of the airport operator to provide a lower proportion of spaces. For example, the usage of parking spaces for disabled people at one airport was monitored and it was found that, during peak periods demand exceeded supply. The airport opted to increase the number of spaces to 2% of total capacity rather than the recommended 4% and would be *"continuing to monitor usage of the designated bays to ensure that there is sufficient provision".* Their aim was to offer a *"reasonable provision"* rather than be fully compliant. Other airports had also introduced monitoring systems to ensure there are a sufficient number of parking spaces reserved for disabled people.

The location of parking spaces reserved for disabled people had also been reviewed at some airports. A new short-term passenger pick-up car park was located near to the terminal on an area without the steep gradients passengers parking in other car parks would encounter. In long term car parks, new designated parking spaces had been located close to pick up stops or near to the car park operator's staffed kiosk. The latter car park operator felt they were able to offer more assistance to disabled people because they were more visible.

Another common change in car parks was to remark the designated parking spaces with side and rear safety zones. The 2004 access audits had found that these zones were often undersized.

Signage had also been improved within some car parks. This included directional signage to the spaces reserved for disabled people and signage for each space to indicate that it was reserved for disabled people. In some cases this remained to be surface markings, whilst others had mounted the disabled logo on a pole or added further signs to discourage the misuse of the spaces. One airport had added a new sign at the entrance to the car parks to remind disabled users to request assistance on entry.

Less common changes included the introduction of help points near the designated car parking spaces and, in rare cases, though-out the car

park.   Operators that had not introduced help points said they were unnecessary as help could be requested on entry to the car park or courtesy bus drivers could assist.   New, accessible courtesy buses or new bus stops with raised kerbs had been introduced in a few long term car parks. Other changes were the introduction of a service desk with induction loops and the formalisation of car park staff providing assistance to the terminal that could be pre-booked.

In rare cases, a lower level car payment machine had been added that could be used by a wheelchair user. Other airports had not provided a lower machine but had a staffed kiosk. The 2004 access audits found that none of the entry/exit equipment or payment machines assessed followed best practice recommendations so did not have colour contrasted palm operable buttons or had operable parts that could not be reached by a wheelchair user.   Rather than replace entry/exit equipment, the airport or car park operator said that CCTV[11] could be used to identify people who had difficulty using the equipment and they would be offered assistance. It was commented that it would be difficult to source fully compliant entry/exit or car payment machines.

At some airports, the car park operator was unfamiliar with the content of the Code and best practice guidance so had only changed those issues requested by the airport operator. Changes in who operated the car park had also delayed progress at one airport.

The interviews with airport operators revealed numerous changes planned for the future such as extending the changes already implemented to other car parks, a new courtesy bus stop near the designated spaces, and the provision of safe, unobstructed, clearly marked pedestrian routes to the terminal. For example, the final phase of a new car park developed would involve the addition of a covered walkway to designated parking spaces with help points, accessible lower level payment machines and level, unobstructed access to the terminal.

These types of changes should address the difficulties that were encountered by a few disabled passengers in the 2004 and 2005 surveys. In 2005, the majority of blue badge holders arriving by car did not encounter any difficulties parking (14 of the 22). The comments from those who did suggest that in three cases this was because they had difficulty finding a free blue badge space in the car park and five passengers found the directional signage to the spaces poor. A lack of spaces reserved for disabled passengers led some blue badge holders

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[11] Closed Circuit Television (CCTV) – cameras are positioned around the airport and monitored by staff

to suggest that the number of spaces was insufficient or the spaces were being abused so greater enforcement of the spaces was required.

3.6.1.2   Systems for recognising blue badge holders' vehicles if they need to retain their badge

The Code recommends that car park operators establish a system for disabled drivers who are unable to display their parking badge whilst it is parked at the airport. The interviews found that the situation was similar to that in 2004; whilst most airports have such a system in place, few promote it to disabled drivers prior to their arrival at the airport.

3.6.2 By taxi

The 2004 survey found a high level of compliance with the recommendations for taxis in the Code, with the exception of help points. The airports interviewed explained that they did not provide help points because staff were available to assist at the ranks.

A few airports had introduced changes following the 2004 audit, for example, a new taxi office, ramp access to a taxi office, and dropped kerbs where previously there had been none.   The introduction of a dual height desk and induction loop at the taxi desk was planned for the future.

Not all airports had addressed all the issues raised in the 2004 access audits so there were still taxi ranks without appropriate signage or dropped kerbs.

3.6.3 By hire car

Changes had been made to improve the accessibility of car hire facilities or services at a few airports.   The 2004 survey of airport operators suggested that most airports already had a high level of compliance with the Code's recommendations for car hire. The changes included:

• the provision of a ramp to the car hire office;

• the provision of an accessible courtesy bus to take passengers between the centre and the terminal;

• the introduction of special arrangements to drive disabled passengers from the airport to the car collection area if the courtesy bus was inaccessible;

• the introduction of an accessible, low-level desk for all of car hire companies to use when dealing with disabled customers; and

- the introduction of formalised arrangements with all car hire companies to ensure staff place themselves at the same level as wheelchair users where necessary. Low-level desks were introduced but subsequently withdrawn at this airport due to incompatibility with the car hire company's computer equipment.

3.6.4 By bus or train

The 2004 survey indicated that most airport operators thought that the public transport interchanges at their airport were fully accessible but the access audits found that few airports had accessible bus stops, accessible bus information, or provided help points for people arriving by train or bus. In 2005, a few airport operators had addressed these issues to some extent.

The main changes were the provision of seating and timetable information at a level that could be read by wheelchair users. Airport operators also reported the introduction of new routes with accessible buses or the replacement of older vehicles with low floor buses on routes serving the airport.

As part of a re-development at one airport, all bus stops and shelters had been relocated during the development and signage improved to help passengers identify the correct bus stop. This airport had also invested in a new railway interchange. This building had incorporated some aspects of good practice such as colour contrasted step noses and lifts with palm operable lift control buttons that were colour contrasted and had raised numbers.   However, the researchers noted that some of the materials used in the building caused significant glare that could cause people with vision impairments difficulties. The building also had help points but these were unlabelled so that their purpose was unclear. Other airports had not addressed the lack of help points at the entrances and exits to public transport interchanges.

Airport operators that had not addressed issues raised in the 2004 audits explained that these areas were to be redeveloped and would incorporate improvements. One airport planned to introduce an electronic bus timetable, with information points in the terminals and at the bus stop.

3.6.5 Routes to the terminal (pedestrian access)

As highlighted in Section 3.6.1.1, a few airport operators indicated that they intended to make improvements to pedestrian access from car parks to the terminal. Findings from the 2004 access audits and

disabled travellers survey suggested that these routes could be improved, despite most airport operators believing these routes were already accessible at their airport.

The airport operator interviews in 2005 found that changes to pedestrian routes had not been prioritised and were usually part of future plans. This included the provision of a new set-down area to overcome the lack of pedestrian crossings. The changes that had been implemented were the removal of some of the obstructions raised in the access audits, provision of dropped kerbs at crossing points and addition of colour contrasted bands on bollards on routes.

3.6.6 Assistance from the point of arrival to check-in

The 2004 survey indicated that wheelchair assistance from point of arrival to check-in was available at most airports and vision impaired people could usually be guided. Disabled people could also receive assistance with lifting baggage and/or mobility equipment out of the vehicle. The interviews with airport operators in 2005 did not indicate that this situation had changed.

The interviews indicated that the level of assistance provided landside varied across airports. Some airports offered a comprehensive service that included assistance from any point of arrival and to onward modes of travel for people with all types of disabilities and paid porters to help with baggage. Others only provided wheelchair assistance once the passenger arrived at the terminal building to check-in. However, the airport operators said this may change if airports become responsible for all assistance provision at the airport.

The reason given by one airport operator for not funding assistance from point of arrival to the terminal was:

> *"We've not had any complaints from people who have struggled to get to the terminal. If they can park their car, it is generally assumed that they can make their way to the terminal."[Airport operator]*

Other airports had overcome this gap in assistance provision by establishing partnerships with car park operators to cover assistance from the car park to the terminal.

Handling agents providing wheelchair-only assistance for airports reported that some sensory impaired people were offended to be offered a wheelchair but this was the only assistance they were trained to provide.

There was not always a means for disabled people to request assistance on arrival but the airport operators explained that the customer service staff were trained to identify people with mobility difficulties and offer assistance. A small airport had tasked security personnel with this role. It was possible to pre-book this assistance at most airports; those airports that did not offer pre-booking said that it was not required because there was sufficient staff available to meet demand.

Measures introduced by airports to improve the quality of the assistance they offered included:

- disability awareness training for staff providing assistance or who could offer assistance;

- regular meetings with their assistance provider;

- a policy of 'seamless assistance' wherein assisting staff waited with passengers until they were either collected by another member of staff or met by their mode of onward travel; and

- a procedure to by-pass check-in queues.

Future changes mentioned by airport operators included the addition of a porter service to assist with luggage.

The 2005 survey of disabled passengers indicated that 13 of the 44 disabled passengers who said they needed it received assistance from their point of arrival to the terminal and 12 of the 24 people who said they needed it received assistance to check-in. There was no increase in the proportion of passengers who said they needed it and received it compared to 2004[12].

The passengers' comments reveal that another passenger or a friend sometimes provided this assistance. A member of staff did not always provide it. Of those who did receive airport assistance, four people had pre-booked the assistance, one person used a help point, and a member of staff offered four other people assistance.

Twenty disabled passengers (15%) reported that they had difficulties getting from their point of arrival to the terminal. The most common explanation for finding it difficult related to a lack of adequate assistance provision. The passengers commented that it was difficult to manage without help, no assistance was available to assist with luggage, or the assistance provided was inadequate:

> *"couldn't get assistance until booked in." [Disabled passenger]*

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[12] 34% in 2004 received assistance from point of arrival to the terminal, whilst 30% received it in 2005. 42% received assistance to check-in in 2004 and 33% received it in 2005.

"nobody to take me, no staff to take me…". [Disabled passenger]

"no help, [my] husband had to manage the luggage and wheelchair." [Disabled passenger]

"the people assisting her [the disabled passenger] had to assist two [other] disabled people as well as manage lots of cases." [Disabled passenger's carer]

Other reasons given related to physical aspects of the airport such as a lack of a drop-off area outside the terminal, long distances to cover by wheelchair from car park to the terminal, poor directional signage, an inaccessible courtesy bus and a lift with buttons that could not be reached by the disabled person.

These types of issues were also found in the 2004 disabled passenger survey.

The handling agents interviewed also described difficulties assisting people at airports with no porter services, forcing staff to push wheelchairs and carry luggage.

3.7 Access to, and facilities within, the terminal building

3.7.1 Signage

The 2004 survey indicated that the signage provided at the airports followed most of the recommendations in the Code, but that, in some cases, there were a lack of signage. Few airports had tactile signage and those provided did not always meet best practice.

Comments made by disabled passengers in the survey in 2005 suggest that signage could still be an issue at some airports. A lack of signage or unclear signage were the most common reasons cited for encountering difficulties finding check-in desks or the gate at the airport. Specifically, they commented that the font size was *'too small'*, or positioned too high. There were also complaints on the accuracy of some signage.

Signage was discussed as part of the interviews with airport operators in 2005. On-going programmes to update signage were in place at most airports. As part of these programmes, new tactile and Braille signs had been installed to toilets: at one airport the existing tactile signs had altered tactile toilet signage to soften the symbols following feedback from the access auditors. Some airports were changing their signage to corporate white on blue or black on yellow. The location and positioning of some signage had also been reviewed. When the researchers reviewed examples of the signage, they found that some signs did not

contrast with their background (for example, a blue sign positioned on a blue door) or the sign itself had poor colour contrast (grey lettering on white background).

A less common change was the introduction of new signage at check-in informing wheelchair users that staff would come around to the front of the desk, or a sign to inform passengers that assistance was available if they were unable to queue.

The 2004 access audits had reported that the signage conflicted with advertising at a few airports. To reduce this problem one airport had removed most advertising from areas passengers may find confusing. However, examples were still observed at other airports.

Not all of the issues raised by the access audits had been addressed by airports, such as the use of blue fluorescent lighting above signs, undersized lettering and inconsistent illumination. In some cases the issue would be addressed when the signage needed to be replaced, others would be considered as part of larger reviews.

The disabled passengers suggested that there should be more visual information and a greater provision of information screens. Conversely, there was also a general request for more information in a non-visual format.

3.7.2 Check-in

3.7.2.1   Check-in facilities

The 2004 survey found a low level of compliance with the Code's recommendations for check-in facilities. Few airports provided desks that were designed to be accessible to passengers in wheelchairs and ambulant disabled passengers and few had fitted induction loops at the desks.

The interviews with airport operators identified some changes to check-in facilities: new check-in extensions had been opened in the last year at two airports, and other airports had installed induction loops at all or some check-in desks.

Both airports opening new extensions had considered the need for a lower height desk for wheelchair users and found different solutions: one new extension included the provision of dual height counters at a quarter of the check-in desks. Ticket counters also used the same dual-height desks. The other airport had provided a single low-level desk for airlines to use to check-in disabled passengers.

The existing check-in desks are unlikely to be changed until the departures hall is refurbished. There was some concern among airport operators about an appropriate standard for check-in desks so one airport group was developing its own. They would prefer a single height desk that could be used by disabled and non-disabled passengers that also met the needs of staff. A few larger airlines mentioned that they had had meetings with airport managers about the design of check-in desks.

To help overcome the difficulties of using a high level desk, airlines and handling agents said their staff would come round to the front of the desk, where possible, so they were at the same level to check-in a wheelchair user. A less common solution was to provide a small, moveable writing desk.

The needs of ambulant disabled passengers at check-in desks did not appear to have been considered to the same extent and there had been no changes to queuing facilities. None of the airports had check-in desks with support rails or queuing barriers that an ambulant disabled person could lean against. Instead the airlines said they had systems in place to identify people with mobility difficulties to allow them to by-pass the queue, such as 'floorwalkers' whose role was to identify people. Most handling agents interviewed also said they scanned the queue to identify those needing assistance, although it was acknowledged that:

> *"…queue lengths make it difficult to see passengers at the back of the queue."[Handling agent]*

Another common system described by airport operators and handling agents was for those being assisted to check-in to be brought forward to the front of the queue. A separate desk may also be kept clear for such occasions.

Comments made by disabled passengers responding to the 2005 survey suggest such systems were acceptable. However, there was a concern among passengers with a non-visible disability that they would not be identified. There were requests for more staff to be 'floating' to identify disabled people. Other disabled passengers said that seats were needed alongside queues or wanted a lower height check-in desk for wheelchair users.

It was rare for check-in staff to be trained to use sign language but some handling agents had printed sheets with common questions, such as security questions, that could be used. None of the hearing impaired passengers who took part in the 2005 survey mentioned that these sheets were used when they checked in. The passengers said they communicated with staff by lip-reading, asking the member of staff to

speak slowly, louder or to look directly at them. Two passengers wrote things down. Their impression was that the member of staff did not have deaf awareness.

3.7.2.2   Self-service equipment

The introduction of self-service check-in equipment by airlines had continued since 2004. Generally, airlines providing self-service equipment said staff were present at check-in times to help passengers use the machines so they had not provided the help points recommended in the Code.

3.7.2.3   Check-in procedures

The Code recommends that check-in staff check reservation arrangements to ensure pre-booked assistance is provided. If no request is recorded, and the staff consider that assistance might be needed, they should ask the passenger and arrange it if required.

Information provided by airlines in 2004, and by handling agents and airlines in 2005, indicates that managers believe this happens. However, the 2004 disabled passenger survey found that less than half (45%) of the 68 disabled passengers who pre-booked assistance said it was mentioned by staff at check-in. In 2005 this proportion had increased slightly to 51% of 80 disabled passengers who had pre-booked. This difference was not statistically significant. Nor was the change in the number of people who had not pre-booked assistance but were offered assistance by check-in staff: in 2004, 5 of the 17 (29%) disabled passengers were asked and in 2005 47% (20 of the 43 disabled passengers) were offered assistance. Fewer disabled passengers were also advised of the distance to the gate in 2005[13].

In some cases the disabled passenger asked about assistance at check-in and did not wait for it to be mentioned by the member of staff. Overall, nearly three-quarters (73%) of the 59 disabled passengers in the 2005 survey who said they needed assistance from check-in received it. Nine of the 16 passengers did not receive assistance had asked for it (eight said they had pre-booked and eight were travelling with other people).

Some airlines commented that it was the handling agents' responsibility to ensure assistance was provided. The handling agents interviewed all had standard procedures to establish the level of assistance passengers may require to get from check-in to the gate and to board the aircraft.

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[13] 24% in 2004 compared to 10% in 2005, Chi-square = 7.55, p<0.05

This included checking if assistance had been pre-booked and, if so, that staff should confirm at which stage wheelchair assistance was required. If the passenger had an *"obvious physical disability"* check-in staff would advise the passenger of the distances involved and obstacles they would encounter to determine if assistance was required. A less widespread procedure was to discuss assistance requirements with the passenger using a briefing pack with illustrations and key questions to establish passengers' needs. This had been introduced at the airport because the handling agent found that assistance was often requested but was not needed, especially use of the ambulift. Since the introduction of the pack the use of amublifts had been reduced. It is, therefore, not clear why so few disabled passengers reported that their pre-booked assistance was mentioned by check-in staff or were offered assistance if they had not pre-booked.

The Code also states that check-in staff should, before assigning a seat, inform the passenger of those available seats most accessible and establish with the passenger an appropriate seat assignment. Both airlines and handling agents interviewed felt that they met this recommendation, where possible.   The 2004 and 2005 disabled passenger surveys, however, suggest that few disabled passengers are consulted about the most accessible seat available; although the majority of disabled passengers were happy with the seat they were allocated. The reasons given by the 26 disabled passengers travelling with a UK airline who were dissatisfied in the 2005 survey were:

- their seat was too far from the front of the aircraft so difficult to get to

- fixed armrests made it difficult to transfer to/from the seat

- they were allocated a window seat which was difficult to get into and out of

- other passengers were disturbed because they were allocated an aisle seat or they had to swap because the aisle was too narrow to get to the seat they were allocated

- they did not get the seats they were allocated at check-in

- the passenger could not sit with their companions

- seats were unallocated

- the seat was too small.

Handling agents explained that they followed information provided by airlines to allocate seats. This varied in detail from safety regulations prohibiting the allocation of emergency row seats to disabled passengers

to detailed, colour coded seating plans. Some airlines would not allocate disabled passengers aisle seats because of evacuation procedures; others had no restrictions apart from seats covered by safety regulations.

It was rare for the information provided by airlines to handling agents to include details of which rows had seats with moveable armrests, extra legroom or where it was best to sit with an assistance dog. The handling agents said that passengers were usually allocated seats near to the entrance at which assistance providers boarded the passenger. However, the airline may have decided to keep the first few rows free, following customer feedback for example. Detailed information about seat accessibility on aircraft was more likely to be available to the airline's pre-flight team who dealt with seating allocations than the handling agent who provided check-in services.

It appears that the restrictions on seat allocation are not always explained to disabled passengers who feel it would be easier to be assisted it they were sat in a boarding row.

3.7.3   Assistance provision from check-in

Airlines usually contracted a handling agent to provide this service. The service typically consisted of wheelchair assistance from a landside reserved seating area, through security to the departures lounge. Passengers were then left in a seating area before being collected again and taken to the departure gate for pre-boarding. Not all assistance providers would wait with the passenger or take them to use facilities landside or airside, such as a café or shop. They would, however, take them to use the toilet. One interviewee commented that they were

> *"not paid to chaperone passengers around the shops". [Handling agent]*

Airport staff would assist passengers wanting to shop at these airports.

> *"Too embarrassed to ask staff to wheel her around shop/café etc" [Disabled passengers' carer]*

At smaller airports the passenger usually waited longer landside, where there were more facilities, before being taken through to the departure gate for pre-boarding.

It was less common for assistance providers to assist sensory impaired passengers. Larger airlines used their own staff to assist these passengers.   This may explain why some sensory impaired passengers have been offered wheelchair assistance to the departure gate rather than being guided. Those handling agents that did guide vision impaired

passengers through the airport said the passenger would be fully briefed on the assistance procedures.

At some airports a single handling agent provided assistance for all airlines for a standard charge. However, the interviews with airlines suggested that this was not always popular. For example, one airline commented:

> *"[we are] desperate to actually to do it ourselves, there is no point in paying that amount of money for that level of service" [Airline].*

Assistance from check-in may have been contracted to a different handling agent than that used by the airport operator to check-in. Seven of the 18 disabled passengers in 2005 who received assistance to check-in said that the same member of staff assisted them to the departure gate.

Three disabled passengers mentioned problems with the assistance they received from check-in to the departure gate. These were a request for assistance not being processed and being left in a room for an hour without being told where they were, who they were with or what was happening. One disabled passenger said they were told they could not borrow a wheelchair unless a member of staff pushed it.

3.7.4 Reserved seating areas

In 2004, around half of the airports responding to the survey had followed good practice and provided a reserved seating area. The interviews with airport operators in 2005 found that airports without reserved seating areas had now introduced at least one area landside and airside, although these areas were not always located near a staffed desk or with a help-point, as in 2004.

Airports with reserved seating areas at the time of the audit in 2004 had addressed some or all of the issues raised, such as circulation space, a mixture of seating with and without armrests, low level flight information, a staffed desk or a help point. Where the airport had not provided a staffed desk, the operator said this may happen if the airport assumes control of assistance provision but, until that time, funding was not available, or that they were unnecessary because the areas located near gates airside that were staffed during boarding.

Some airports had tried to achieve greater integration of reserved seating areas into other seating areas to reduce a feeling of 'detachment' passengers may have using the areas.

3.7.5 Public facilities

3.7.5.1   Public telephones

In general, airport operators felt that their public telephone provision was relatively compliant, despite the 2004 access audits indicating that there was a lack of provision of textphones. Only one of the nine airport terminals audited had at least one textphone landside and airside.

Following the 2004 audits some airports had installed lower telephones where previously there were none to improve access for wheelchair users. In addition, the circulation space had been improved. One airport had installed a textphone landside.

3.7.5.2   Accessible toilets

It was common for airport operators to mention during the interviews changes that had been made to accessible toilet facilities. This included the addition of new accessible toilets or refurbishment of existing facilities. At a few airports the changes had addressed some issues mentioned by the access audits, such as a lack of colour contrast within the toilet, tactile signage, closing bars, locks and non-slip flooring.

To address concerns about colour contrast, the airports had either purchased coloured handrails and toilet seats and/or used dark coloured wall and floor finishes to contrast against white fittings. However, it was noted during the visits that the changes were not always totally successful because the use of standard fittings and a standard colour scheme meant that some fittings did not contrast against all the finishes within the cubicle. For example, a blue handrail was mounted on a blue door. It was also noted that some new facilities did not incorporate colour contrast and used stainless steel fittings. Other features not always included were closing bars, tactile signage and full-length mirrors. The flush was inaccessible in some toilets.

It appears that, in some cases, the airport's standard had not been followed or the standard did not follow all aspects of good practice, such as using colour contrast to highlight fittings, easy to use locks or the position of handrails.

Disabled passengers who reported difficulties using an accessible toilet at the airport in the 2005 survey said that the doors were heavy or difficult to open or the flush was inaccessible. They also felt that there were too few accessible toilets so they had to travel a long way to find one, or it was difficult to locate without assistance.

The 2004 access audits had found instances of emergency cords being tied up and waste bins being placed in the wheelchair transfer zone. Airports that had addressed these issues had done so by training cleaning staff. At other airports the practices were still on-going: one airport's staff believed the cords should be tied up to avoid getting tangled in a wheelchair.

3.7.5.3 Facilities for assistance dogs

In 2004, the survey of airports and access audits found that it was rare for an airport to provide a relief area for assistance dogs. This was still the case in 2005. None of the airports interviewed had an area that followed guidelines in the Code and only one airport intended to provide this facility. Alternative arrangements were generally informal and usually involved the use of a grass area outside the terminal. One airport informally used the dog kennel facilities.

Since publication of the Code, the International Travel Group and Guide Dogs for the Blind have agreed new arrangements.

3.7.5.4 Other public facilities

In 2004 the survey found that most public facilities were accessible to disabled passengers in the survey. This was also the case in 2005. Those passengers that did encounter difficulties using shops, restaurants or waiting areas usually mentioned a lack of circulation space within the area. The passengers with hearing impairments had difficulties because of the noise or a member of staff had not looked at them when speaking so they could not lip-read. A vision impaired passenger had difficulties using a restaurant because they were unable to read the menu. Other disabled passengers would have liked to be offered assistance to help them use a self-service restaurant or café. One disabled passenger commented that the smoking area was too small for wheelchair users.

The interviews with business partners suggest that assistance was available and staff would help disabled customers and read out menus. The retailers interviewed explained that disability awareness training was not offered as the issues were covered as part of customer service training.

The airport operators and business partners interviewed described the changes that had been made to public facilities since 2004. For retail units and services this included the installation of lower cash machines and post boxes to facilitate use by wheelchair users and the

reconfiguration of tables and chairs to prevent trip hazards and improve access to seating areas in concessions. As discussed in Section 3.3.2, airport operators generally left concessionaires to ensure the accessibility of their own facilities. Consequently, few changes were reported in 2005 and the new facilities that were observed often lacked a dual level counter or seating and tables that colour contrasted with their surroundings.

Future changes to public facilities reported by airport operators included changes to control facilities (i.e. immigration, customs and VAT reclaim). These centred on new desks, often with induction loops and with sloping writing areas.

The main changes that the airports had been able to influence were the decoration and refurbishment of public areas within the terminal. The airport operators described attempts to increase the accessibility of the terminal for vision impaired people by providing colour-contrasted bands on bollards and canopy supports, and the provision of new or larger manifestations on glazed doors. There were also plans to replace carpets in the future. Changes made to facilitate movement between levels within the terminal are discussed in Section 3.8.3.

Concern about disturbing the aesthetics of the interior was expressed by airport operators for some suggested changes such as, highlighting the frames of terminal entrance doors or removing blue fluorescent lighting.

3.8 Airside facilities

3.8.1 Security

The Code states that security facilities should be accessible to disabled people and staff should offer assistance, for example lifting bags onto the X-ray machine, if necessary. The Code also recommends that staff adopt the advice in the European Civil Aviation Conference (ECAC) guidance for security staff[14]. The 2004 survey of airports suggested that many airports followed this advice.

As part of the review of airports in 2005, interviews were carried out with security personnel. These interviews revealed that some changes had been made to the facilities such as new signage (including pictograms and Braille), announcements or the provision of induction loops. A less

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[14] ECAC policy statement in the field of civil aviation facilitation, Doc. No 30 (Part 1) 9th Edition. July 2003, ECAC Document No. 30. Annex F.

common change was to provide low level tables and chairs for passengers to gather belongings.

The interviews indicated that although staff were not specifically aware pf the ECAC guidance, most staff were able to demonstrate that they followed procedures suggested in the guidance. These included:

- Procedures to monitor security queues and bring forward disabled people. The airports usually had a procedure for wheelchair users and passengers being assisted to by-pass queues and/or the security archway. Staff checking boarding passes should also look for disability codes and by-pass passengers if necessary. However, a by-pass system was not always popular with handling agents. One agent felt that it created conflict and embarrassment for staff and passengers.

- An awareness of the need to question disabled passengers about any discomfort before conducting a body search, as one interviewee commented:

    "Before they [staff] even touch them they know to ask them where they hurt so they do not cause any injury."

- An awareness of the need to explain search procedures to vision impaired people thoroughly before and during a search. Security staff would offer to guide the vision impaired person if a mobility aid was taken away to be x-rayed. They were also trained to remove and replace items from bags in exactly the same place. At most airports another member of staff witnessed baggage searches of vision impaired passenger, others relied on CCTV monitoring of staff.

- An awareness that passengers may not hear or understand verbal instructions and so staff are trained to use open gestures (such as wide arms to bring people forward for a body search) to help overcome communication difficulties. Security staff were also trained to be aware of the need to face all passengers when speaking to allow lip reading.

Disability awareness was incorporated into staff training at some airports. This usually consisted of a video and helped staff be aware of hidden disabilities and medical aids. Communication skills were not always covered comprehensively in staff training.

The interviews indicated that whilst, in general, security personnel were willing to assist where passengers were having obvious difficulties, such as with placing luggage on conveyor belts or removing/replacing clothing, they did not always see it as their role. In such cases the security staff felt assistance providers should undertake this role.

As in 2004, the majority of disabled passengers in 2005 were satisfied with the way security staff treated them and 85% said the search procedures were adequately explained. The reasons given by the ten disabled passengers who were dissatisfied included:

- a lack of assistance repacking searched bags or removing bags from the X-ray machine;

- mobility aids being taken away, making it difficult to stand;

- not being consulted about which body parts could and could not be touched;

- the member of staff having a poor guiding technique; and

- staff not being aware of procedures for passengers travelling with an assistance dog.

3.8.2 Flight information

A common improvement described by airport operators interviewed in 2005 was to visual flight information. New systems had been introduced, including screens with improved colour contrast and definition that used mixed case lettering. The location and position of screens had also been considered to improve visibility.

It was less common for airports to address advice from access audits relating to information desks. Those airports that had done so had improved the location of the desks, lowered the desk height or installed an induction loop. An increase in provision of induction loops at desks and counters was noted across the airports interviewed.

Five of the 12 disabled passengers who used an information desk to find out flight information said they found it difficult: two were using an airline's desk. The reasons given were that the desk was difficult to find, it was too high, and the staff did not come around to the front or speak directly to the disabled passenger. The latter comment suggests that staff lacked disability awareness.

Overall, most disabled passengers responding to the 2005 survey felt flight information was 'adequate' or 'good', including those with a hearing impairment. However, a few hearing impaired passengers complained that they were not kept informed and had to make their own enquiries, they could not hear announcements or felt displays should use larger lettering. Three disabled passengers without a hearing impairment commented that announcements were not clear or were too quiet.

3.8.3 Gate facilities

The disabled passengers and handling agents participating in the 2005 study described difficulties travelling through airports to the gate due to a lack of lifts or ramps. If lifts were available they were often *"out of the way",* or ramps had steep gradients that were difficult to negotiate. The handling agents said that a lack of ramps and lifts at departure gates created difficulties transferring passengers to and from the aircraft, especially if the passenger was using their own wheelchair. Other passengers had difficulties because of the long distances involved.

Visits to the airports in 2005 found that measures to facilitate changes in levels within terminals had been introduced since 2004.   These included new lifts, which had increased accessibility where installed at departure gates or allowed more than one wheelchair user to occupy the lift, where previously there had only been room for one. The researchers noted that, as in 2004, none of the lifts viewed demonstrated best practice. They usually had stainless steel interiors with no clear colour contrast to define the features of the lift, including the control panels and buttons. The researchers also noted an absence of handrails and mirrors in some of the new lifts. This means some disabled people, particularly those with sensory impairments, may have difficulty using the lifts.   The airport operators also recognised that steep ramps were a barrier to accessibility and, where applicable, had plans to address them when the terminal was re-developed.

Changes had also been made to stairs and escalators with the introduction of a colour change to indicate the start and finish. Colour contrasted step noses had also been introduced. The researchers did, however, observe examples of step noses in new facilities that did not follow good practice. This included the used of stainless steel nosing insets into steps, which were not clearly visible during descent and did not extend the full width of the stairs.

The Code recommends that staff at the gate should identify themselves to disabled people and, in the case of deaf and hearing impaired passengers, should keep them informed when audible announcements are made. These members of staff should also keep people with sensory impairments informed about delays.   The 2004 suggested that this recommendation was partially met and so the issue was explored in the interviews.

The role should be covered by ground handling or airline staff but a comment from an assistance provider suggests that passengers are not always kept informed of flight delays once they had been taken to departures:

> *"This can cause them to panic because the time of their flight will come, they can't see the screens and they think they've been forgotten."[Handling agent providing assistance]*

To ensure deaf and hearing impaired passengers were aware of the content of announcements, a pager-based system was being piloted at a few airports interviewed in 2005. Passengers were given a pager at check-in to inform them of flight information or airport emergencies and evacuation events. Visual paging screens were being considered by other airports to provide real-time information on large screens to target specific passengers.

Staff at the gate should also identify people who may have difficulty using steps and stairs or with the distance to the aircraft and suggest an alternative route or summon assistance. The comments from disabled passengers in 2004 and 2005 suggest that this does not always happen as many of those who had difficulty boarding said this was due to the number of steps or the distance to the aircraft. There was also a concern that disabled passengers were not given sufficient time to pre-board and may end up being assisted in front of other passengers.

The Code also states that transport links to and from remote stands should be accessible. Only three of the 29 disabled passengers in the 2005 survey who said they used a bus to get to a remote stand said it was inaccessible. In one case this was because there was a lack of seats so the passenger had to ask another passenger to give up their seat. The other two passengers were taken in a special vehicle to the aircraft. One person said the vehicle was inaccessible because they could not remain in their wheelchair, the other felt unsafe because they were unsecured in the vehicle (presumably this passenger was travelling seated in their wheelchair).

3.8.4 Wheelchairs

The 2004 survey found a high level of compliance with the Code's recommendation to allow wheelchair users to remain in their own wheelchair to the gate. A high level was also found in 2005: 98% of wheelchair users kept their own wheelchair until they boarded.

The handling agents interviewed in 2005 said that they were keen on this policy, as the following comment illustrates:

> *"From our point of view, they're more comfortable staying in their own chair than having to transfer at check-in. People often feel uncomfortable if they have to transfer at check-in."[Handling agent]*

3.8.4.1 Loading mobility equipment into the aircraft

The interviews with airlines confirmed the 2004 survey finding that airlines stored wheelchairs in the hold and mobility aids in the cabin. Small airlines had a limit of 60kg on the size of wheelchair that could be carried due to the health and safety of baggage handlers. Other airlines were also looking into this and may introduce a weight limit.

The interviews also indicated that the situation regarding the protection of wheelchairs during loading was unchanged. Generally, airlines felt this was a rare problem so it was not a priority issue that needed to be addressed. To minimise damage airlines stored wheelchairs separately from other luggage in the hold, sometimes in a separate container. They are also loaded last and unloaded first. The passenger was also encouraged to supervise the dismantling of the wheelchair and provide a protective case. A larger airline offered additional training to staff loading wheelchairs.

There was a concern among airlines that passengers were under-insuring wheelchairs. They explained that their maximum liability was £800 and, in exceptional cases, the airline thought they would not be liable as a wheelchair was a 'specialist item', but said they would repair or replace it if damaged in transit. The following case study illustrates their concerns:

> *"Situation a couple of years ago where an electric wheelchair fell off the back of the truck and was damaged. The passenger did not have adequate insurance. Airlines work within the Montreal convention…which states that airlines are responsible for $20 per kilo. This wheelchair is only liable up to maximum baggage limit of 20kg so the airlines liability in this case was £240 so that was all we could offer them. Not to say … we offered what we were liable for. People just don't read the small print on their airline ticket. It really is up to the individual to ensure they are adequately insured."[Airline]*

Arrangements for a temporary replacement for passengers whose wheelchair was damaged, lost or delayed were being explored by airlines.

The disabled passengers responding to the 2005 survey reported some incidents of damage to wheelchairs in transit and dissatisfaction with the airline's response:

> *"Wheelchair was badly damaged but was not told… Left in [the] airport's wheelchair with no offer of help" [Disabled passenger]*

3.8.5 Boarding and disembarking

As in 2004, the 2005 disabled passenger survey data supported the finding that passengers who needed assistance were pre-boarded on departure and were last to disembark.

The majority (84%) of the 83 disabled passengers in 2005 said they were satisfied with the assistance they received boarding the aircraft. The disabled passengers who were not satisfied reported that they were unhappy with the way they had been lifted, poor communication from staff, having to wait for assistance so not pre-boarded, or they did not receive the assistance they needed, for example:

> *"no lift so had to try and use stairs" [Disabled passenger]*

Similar reasons were given by the disabled passengers who were dissatisfied with the assistance they received disembarking.

Just over half (56%) the disabled passengers who received assistance said the airline staff told them the procedure for disembarking.

3.9 Aircraft design

The Code describes recommendations for aircraft design to supplement recommendations issued by the ECAC[15]. They apply to new and newly refurbished aircraft with more than 30 passenger seats.

In 2004, the survey of airlines found that compliance with Code's recommendation to have moveable armrests on at least 50% of all economy aisle seats, the provision of an on-board wheelchair on aircraft with more than one aisle, the use of non-reflective floor surfaces and lighting were met. It was less usual for aircraft to be fitted with toilets capable of accommodating an on-board wheelchair and assistant. Not all toilets incorporated colour and tonal contrast or simple and unambiguous signage. It was rare for tactile signage to be provided.

The airlines felt that the signage within their aircraft met the Code's recommendations to be positioned to avoid shadows and glare, contrast with surroundings, and to incorporate pictograms and embossing where appropriate. The aircraft access audits found that, whilst signs were positioned as recommended, few signs contrasted with their surroundings or included embossing.

Handrails were often available within toilets, on access stairs and stairs within aircraft, although the access audits of aircraft found that few were

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[15] ECAC policy statement in the field of civil aviation facilitation, Doc. No 30 (Part 1). 9th Edition. July 2003. Section 5 'Facilitation of the transport of persons with reduced mobility'.

colour contrasted with their surrounding, extended beyond the first and last step or returned to the wall or floor as recommended.

The interviews with airlines in 2005 explored any modifications to the aircraft fleet made since 2004. They revealed further implementation of the Code's recommendation to ensure at least 50% of economy aisle seat were moveable on existing aircraft.

A less common change was for the airline to refurbish the toilets of existing aircraft. The draft Disabled Persons Transport Advisory Committee (DPTAC) guidance for aircraft toilets had been consulted and changes made to improve the colour contrast of fittings within the cubicle, additional handrails had been fitted and taps and locks replaced with easier to operate versions. To enable passengers using an on-board wheelchair access to a toilet, a few airlines had fitted curtains or fittings to hold the door open and increase the space adjacent to the toilet. Other airlines were waiting for the DPTAC guidance to be published before making changes to their toilets. The changes made did not necessarily meet all the recommendations for toilet design in the Code.

Similar changes had been made to new aircraft added to the fleet. This included the provision of moveable armrests and an increase in leg room. Other new aircraft had wider doors and aisles but this was prompted by the need to improve boarding times and efficiency. No other changes had been made to this particular aircraft.

These changes should address some of the difficulties disabled passengers reported boarding aircraft. The disabled passengers and handling agents expressed concern about narrow aisle widths on aircraft, narrow bulkheads and a lack of handrails. A lack of moveable armrests made transferring passengers to a window seat particularly difficult.

The airlines whose aircraft had been audited in 2004 had reviewed the results and sent them to their engineers for future action. One airline had added a border to their signage to increase visibility as suggested in the audit. The colour-contrast of aircraft interiors was also being considered by airlines for future refurbishments. Airlines were either actively refurbishing or replacing their aircraft to be compliant with the Code or said that the economic climate had restricted the changes that could be made due to high costs.

Other reasons for not making changes were space restriction on board the aircraft or safety implications. For example, one airline said there were safety implications of making armrests moveable. They were

believed to disrupt evacuation. Some airlines were only willing to make changes if required by the CAA.

There was a presumption among a few airlines that if the signage met CAA regulations then they were also complaint with the Code.

Future purchases of aircraft were discussed with airlines (also see Section 3.3.3). The airlines either indicated that they intended to use the Code to help design the aircraft or the DPTAC guidance on toilet design, or said they only considered economic issues or CAA regulations:

> *"at the end of the day it's all about efficiency and the turnaround"[Airline].*

Smaller airlines felt they were unable to influence the design of aircraft because they were *"not buying sufficient numbers of aircraft"*, bought second-hand or leased aircraft.

3.10 On board facilities

3.10.1   On-board wheelchairs

As indicated in Section 3.9, on-board wheelchairs were usually provided by airlines.   The design of these wheelchairs had been considered by airlines working with DPTAC on a specification for a more heavy duty wheelchair and these airlines intended to replace their old on-board wheelchairs. They commented that an industry standard was required because each airline alone was too small to influence manufacturers to develop a product.

To address the issue of an on-board wheelchair not being available on an aircraft, new procedures had been introduced by an airline to check it was present before departure.

Airlines not providing on-board wheelchairs said either they were looking to provide them in the future, or did not intend to do so as they were too expensive or their flights were all less than 1 hour 20 minutes.

The Disabled Persons Transport Advisory Group (DPTAC) are currently working on a specification for an on-board wheelchair.

3.10.2   Cabin crew assistance

The 2004 survey had suggested that there was a high level of compliance with the Code's recommendations for the assistance cabin crew to be prepared to offer. However, as indicated in Section 3.4.2.2, some airline cabin crew were not trained to assist disabled passengers

in cutting food or pushing a passenger using the on-board wheelchair to and from the toilet. The airlines not providing this assistance said their staff were not required to undertake these tasks under the self-sufficiency criteria, which states passengers must be able to feed themselves and use the toilet facilities unaided. They felt an escort should travel with the passenger to help them with these tasks. Health and safety issues were also mentioned in relation to assisting passengers using an on-board wheelchair.

Other tasks, such as familiarising disabled passengers with any facilities on-board or assisting with stowage of luggage in overhead lockers, were usually undertaken. In 2005, 39 of the 45 disabled passengers travelling with a UK airline who said they needed assistance putting items in the overhead locker received it. None of the six passengers who did not receive the assistance had asked for it. Five of the eight disabled passengers who said they needed it received assistance moving around the aircraft.

3.10.3   Information on board the aircraft

A low level of compliance with Code's recommendation to ensure all emergency procedures are accessible to people with learning disabilities and provision should be made for blind and partially sighted passengers was found in 2004. The interviews with the airlines that had responded to the 2004 survey suggested that there had been little change. Large print or Braille safety cards had been introduced by a few airlines, others planned changes to safety videos to include sub-titles or use cartoons.

Those airlines that had not taken part in the 2004 had a similar level of compliance with the recommendations. A pack or summary sheet for deaf and hearing impaired passengers or Braille versions of the safety card were available in rare cases. Personal briefings or videos with sub-titles were also used by airlines. Those airlines with no information relating to evacuation procedures in alternative formats were considering Braille versions.

All the airlines have pictogram safety cards. These are usually provided by the aircraft manufacturer so are standard. It is not known if people with learning disabilities were considered when producing the cards.

None of the passengers with a sensory impairment travelling with a UK airline in the 2005 disabled passenger survey mentioned that they had used safety instructions in large print or Braille. One vision impaired passenger mentioned that they had received a personal briefing and two people with hearing impairments said the safety video had subtitles or

were signed. General comments made by disabled passengers suggest that some found the safety instructions difficult to follow:

> *"Safety instructions were not easily accessible" [Disabled passenger]*

3.10.4   Entertainment

Few airlines offered subtitled films and programmes for deaf or hearing impaired passengers in 2004. Generally, there have been no developments in this area since that time and none of the airlines interviewed who had not responded to the survey in 2004 provided entertainment programmes.

In the future, airlines with entertainment systems said they hoped to introduce new systems with a personal option for subtitles for all films or add more films to their subtitled collection.

None of the four deaf or hearing impaired passengers who answered the question reported that the entertainment programmes on their flight had subtitles.

3.10.5   Catering

There had been no changes to catering packaging since 2004, nor was it considered an issue by airlines.

3.10.6   Assistance dogs

An area of change since 2004 was airline policy development for the carriage of assistance dogs. Airlines that operated DEFRA Pet Travel Scheme (PETS) approved routes were developing policies for these flights. The number of airlines that carried assistance dogs increased from two of the seven airlines responding to the survey in 2004 to eight of the 11 airlines interviewed in 2005.

The airlines' policies all permitted the dog to travel in the cabin with their owner but there was a restriction on long-haul flights of up to 10 hours, if applicable. Airlines' policies differed in whether or not the passenger would be charged for an additional seat. They either stated:

• assistance dogs were carried free of charge, or

• a charge was made for an additional seat (this was either a fixed fee or the airline did not offer a discount for the additional seat), or

• the charge was at the discretion of the tour operator, or

- dogs weighing over 10kg incurred a charge for an additional seat (it was assumed an additional seat was not needed for a smaller dog).

    This means that not all the airlines are following the Code's recommendation to permit assistance dogs to travel in the passenger cabin at no extra charge.

Other differences in policies included:

- The passenger was charged a fee for the dog to be checked by the airport's animal clearing agent.

- The airline restricted the number of assistance dogs permitted on a flight.

- Only dogs that had been trained were permitted in the cabin (and proof of training was required).

- The dog must wear their harness and be 'on-duty'.

Crew safety notices had been issued and a procedure introduced to inform the cabin crew and pilot that an assistance dog would be in the cabin. One airline said they provided a special kit on board for emergencies.

Generally, the airlines said the policies were under review. One airline was piloting the scheme at one airport and, if successful, would expand it.

Airlines that did not permit the carriage of assistance dogs in the cabin either said they were awaiting approval from DEFRA for routes or would follow the lead of other airlines if the scheme was shown to operate successfully.

Five disabled passengers travelled with their assistance dog, three of whom travelled within the UK, one to Spain and another to Singapore. In all five cases the assistance dog travelled in the cabin and the passenger was not charged extra for travelling with their dog. One passenger commented that they:

> *"Had pre-booked space for guide dog but, after boarding, found they had not made provision" [Disabled passenger travelling with an assistance dog]*

3.11 Disembarkation, transfer arrangements and leaving the airport

3.11.1 Returning personal wheelchairs to passengers

As in 2004, the 2005 disabled passenger survey found that the majority of personal wheelchairs were returned to their owner before reaching baggage reclaim.

The handling agents said they had procedures in place to re-unite wheelchair users with their wheelchairs at the earliest opportunity, which was usually in the ambulift, at the aircraft steps or in the air bridge. A less common procedure was for the handling agent to liaise with the cabin crew to ensure passengers received confirmation that their wheelchair had been stored in the hold or was ready for them at the gate on arrival.

3.11.2 Baggage reclaim, passport control and customs

No changes since 2004 were reported in these areas by airlines or airports.

In 2005, three-quarters of the people who said they needed assistance in baggage reclaim received it and in the majority of cases this assistance was offered.

There were no statistical differences between 2004 and 2005 in how easy disabled passengers felt it was to make their way through passport control and customs. In 2005 seven disabled passengers had difficulties making their way through passport control and five disabled passengers experienced difficulties making their way through customs. The reasons for having difficulties were similar to 2004 and most related to the design of the facilities. The passengers said they had difficulties because there was a small space between desks, the desk was too high for a wheelchair user or they could not find their way through. There were also complaints about long queues, crowding and a lack of assistance.

3.11.3 Assistance provision from the aircraft up to the point of onward travel and transfer arrangements

No changes to assistance provision from the aircraft up to the point of onward travel had been implemented since 2004. The airlines said that they contract a handling agent to provide this service and it was the handling agent's responsibility to organise and implement transferring

passengers directly from one aircraft to another but this was not usually permitted. The only change to transfer arrangements reported was the introduction of a new desk at a major airport. This desk was provided and operated by the airport to ensure passengers were assisted from one aircraft to another and between airlines.

The airlines and handling agents reported that the same member of staff usually assisted the passenger to their onward travel, as recommended in the Code. At an airport where the handling agent passed passengers over to airport staff in the arrivals hall, the handling agent felt the procedure could be improved as there was no designated hand-over area or facility to pre-book airport staff.

The proportion of passengers receiving assistance from the aircraft in 2005 was not statistically different to that found in 2004. The majority of the 84 disabled passengers in the 2005 survey who said they needed assistance to the arrivals hall received it (92%) and 73% of the 56 passengers who said they needed assistance to their onward mode of transport received it. Around half (55%) of the disabled passengers said they were assisted by the same member of staff from the aircraft to their onward mode of transport.

3.12 Awareness of the Code

Generally, there was a high level of awareness of the Code among the airport operators and airlines interviewed, as reported in 2004. Those not familiar with the document tended to be smaller airlines or business partners, such as handling agents, car park operators, security companies and catering outlets.

The airport operators' and airlines' opinions on the Code were sought as part of the interviews. These revealed a range of views on the usefulness of the Code and its applicability to their business. Among airport operators those who felt the Code was useful had consulted it to plan changes to airport facilities or to encourage others to make changes at the airport. Those airport operators who did not find it as useful said they followed other standards (either their own airport standard and/or British Standards) or building regulations to cater for the needs of disabled people. These standards tended to focus upon physical access at the airport and less on the standard of service that should be expected, which is described in the Code. Generally, they felt they already met the relevant parts of the Code.

Similar opinions were held by the airlines interviewed. It was common for airlines to believe that their standards were already sufficient to cater

for the needs of disabled people, the standards were believed to be higher than other transport industries, and they felt they were already compliant with the Code in most areas. There was, therefore, no need for the airline to make further changes, as the following comment illustrates:

> *"The Code hasn't caught up with anything we do as an airline or indeed an industry". [Airline]*

The airlines that were unfamiliar with the Code's content reported that they followed regulations or CAA requirements. They may not have considered that the Code was applicable to them, or believed other people were responsible for ensuring accessibility for disabled people such as, ground handling agents, the airport, aircraft manufacturer, or travel agent or tour operator.

Those airlines that were following the Code closely expressed some frustration with airlines who were not following it as closely, pointing out that the costs were not insubstantial, but they were still reluctant to alter its advisory status. It was suggested that the Code could be used as a benchmark to rank airlines and allow passengers to compare service levels. However, there was a concern about the applicability of some of the content of the Code, especially among no-frills airlines that were keen to keep their costs as low as possible and who do not have seating allocations, on board catering or entertainment, for example.

The cost of some of the Code's recommendations was a concern for the airlines and had influenced the changes that had been made since 2004. For example, an airline may have focussed upon *'softer issues'* and had not addressed aircraft design. An atypical view expressed was that the airline did not intend to address some recommendations because there was no economic justification: the airline would only introduce changes that could improve accessibility if there was an economic advantage.

3.13 Other comments

3.13.1   Proposed changes to assistance provision

A frequent comment made by airlines was that they would like the airport, or a single provider, to take responsibility for assisting passengers through the whole airport to ensure seamless assistance and the cost spread across all passengers. They believed this approach would overcome resource problems encountered due to the unpredictable numbers of passengers requiring assistance each day for any one airline. The need to clarify who (the airport or airline) is

responsible for ensuring transfer to and from aircraft was also raised as an issue.

3.13.2   Disabled passengers' other comments

The disabled passengers were given the opportunity to say how they thought the journey could have been improved or made easier. Many of the suggestions they made are already recommendations in the Code. For example with booking, disabled passengers said they would like to pre-book seats or receive written confirmation that assistance would be provided. They also said they should be able to use their own wheelchair until boarding and assistance should be available from the car park and within all areas of departures and arrivals. There were also complaints about the aircraft and service on-board that could be addressed if the recommendations in the Code were followed, for example:

> *"Size of toilets on plane – too small for wheelchair and another person to assist"*

> *"Armrests did not move which made it very hard to get in/out"*

> *"Every airline should provide subtitles on entertainment, crew announcements, warnings…"*

The disabled passengers felt that obtaining assistance could be made easier. This included the process of pre-booking assistance and on arrival at the airport. The following suggestions were made to on how assistance could be obtained:

> *"Make clearer where assistance phones are"*

> *"Need signs everywhere saying what to do if need help"*

> *"Need better information about how to find the assistance lounge"*

Other suggestions for improving assistance provision related to better communication from the time of booking and clearer information, as the following comments illustrate:

> *"[Need] better communication between travel agent, airport and airline staff"*

> *"Need to make [sure] chain of communication does not break down from booking to boarding the aircraft."*

> *"Should provide passengers with [a list of the] different sorts of help that's available"*

> *"Need to make it clear whether it's the airline or airport staff that give assistance."*

Disabled passengers also commented on the equipment used and lifting:

> *"Airport wheelchair tyres needed to be pumped up more – [should be] better maintained"*

> *"Need better security when on ambulift, one strap does not feel secure"*

> *"[Need to] improve lifting and handling"*

> *"lifted in front of general public – need separate area"*

One person suggested:

> *"Could allow a friend/relative/carer that's not flying to accompany you to departure gate/lounge"*

Comments about the airport infrastructure or facilities were made. These included:

> *"Good minibus service for wheelchair users, makes it less stressful than parking"*

> *"Distances within the terminal are too long"*

> *"Need more escalators/travelators within the airport"*

> *"Support rails that are in use aren't suitable…"*

The disabled passengers also commented about aircraft design and facilities:

> *"Step onto aircraft unnecessary and hard to negotiate – needed ramp"*

> *"Steps to the aircraft need to be more secure"*

> *"Seats on plane too narrow."*

> *"[Need] more leg room on seats"*

> *"[Need onboard] power points for portable DVD players… as in-flight entertainment not accessible"*

A large number of comments made by disabled passengers related to staff. These comments suggested that disabled passengers felt staff could have greater disability awareness:

> *"Staff [are] mainly happy to help but often don't know how"*

> *"[Need] more staff training on how to handle disabled travellers"*

> *"[Staff should] offer assistance but if person does not want it then respect that"*

> *"[Staff] tend to only see the disability and not other needs like having small children"* [this passenger encountered difficulties because her child's pushchair was not returned at the aircraft and she could not carry the child to baggage reclaim]

There was a particular concern that staff did not recognise people with non-visible disabilities and this meant they were not, for example, given priority check-in:

> *"There needs to be a greater understanding of the needs of hard of hearing people"*

> *"Staff need to be more open minded about the term 'disability'"*

> "*[not just] giving priority to people with visible disabilities"*

Examples of good service were also noted, but disabled passengers would have liked this standard to be more consistent:

> *"All airport staff are very helpful when they see someone with a disability"*

> *"Travel by air is ok except for unreliable staff quality"*

The disabled passengers suggested that communication between passengers and staff, particularly those providing assistance, could be improved. One disabled passenger suggested that:

> *"Staff should say their names"*

As in 2004, the disabled passengers' opinion of air travel overall was mixed: some felt confident to travel alone because of the assistance available, whilst others were not. There was also a difference on opinion on whether the service has improved or worsened:

> "*Would have happily travelled alone – confident that help is sufficient at the airport and on-flight*"

> *"Wouldn't have felt comfortable travelling alone*"

> "*Airlines used to be good with disabled [travellers] but service [is] getting worse*"

> "*On the whole things have… improved a lot with regard to disability issues*".

3.14 Summary

The following bullet points summarise the areas of the Code with a low level of compliance in 2004 and indicates those areas where changes have been made to improve compliance and those areas where there has been little or no change.

Areas of change

- Training

- Website accessibility (excluding booking engines)

- Booking

    o Introduction of procedures to increase the number of passengers pre-booking assistance

- Airport infrastructure

    o Implementation of some audit findings

    o Development of strategies to address audit findings

    o New facilities

- Establishment of working groups at airports

- Development of policies for the carriage of assistance dogs

- Plans for newly commissioned aircraft

Areas of little or no change

- Pre-journey

    o Alternative media

    o Use of the ABTA form

- Booking

    o Pre-booking of seats

    o Discount for additional seat or escort

- Airport facilities and services

    o Advertising blue badge system

    o Help points at all points of arrival

    o Check-in procedures and facilities

    o Assistance provision

    o Security

    o Provision of assistance dog areas

    o Minimising wheelchair damage

- Service on board the aircraft

    o Information

> o Catering and entertainment

- Aircraft design

4 Discussion

The monitoring study described in this report was undertaken to examine whether there had been any changes in compliance with the Department for Transport's Code of Practice since the benchmarking survey was conducted in 2004. The study found a few areas where progress had been made in the 18 months since the 2004 survey, although overall there was little change in compliance with the Code.

An area that had improved included the disability awareness and/or equality training of staff at airlines and airports. This often involved the introduction of a new training package, the training being extended to all staff, or refresher courses being introduced. Airport operators said that they were encouraging business partners to offer disability awareness and/or equality training to their staff and, in some cases, business partners had attended the training provided by the airport. The interviews also indicated that there was a perception among some service providers, including handling agents, that general customer service training covered disability issues and so disability awareness training was not required. The training provided by handling agents was closely related to the services they provided so may not cover how to deal with sensory impaired people if they did not provide this service for airlines.

Feedback from the disabled passengers who took part in the 2005 survey suggests that communication between staff and passengers could be improved further. The comments passengers made suggest they felt staff lacked disability awareness, especially in relation to hidden disabilities such as deafness. It should be noted that these passengers did not necessarily travel from the airports or with the airlines that said they had improved their training. Some gaps in training could be addressed by the proposed EC regulation concerning the rights of persons with reduced mobility when travelling by air[16]. It is proposed under Article 9a that all personnel who deal directly with the public receive disability awareness and disability equality training at induction and refresher training when appropriate. It also requires staff providing

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[16] Report on the proposal for a regulation of the European Parliament and of the Council concerning the rights of persons with reduced mobility when travelling by air (COM (2005)0047 – C6-0045/2005 – 2005/2007(COD)). Final A6-0317/2005. Committee on Transport and Tourism. European Parliament, Brussels, 27.10.2005

assistance to have the knowledge on how to meet the needs of disabled people with various impairments, including sensory and cognitive impairments.

Another area of improvement that was found was in the accessibility of websites. Airlines and airports indicated that they had been working to improve the accessibility of the websites since 2004 and some were now believed to be compliant with W3C guidance. However, the monitoring study found that it was unusual for changes to be made to the booking engine and it was rare for a website to have a facility to enable a disabled customer to book assistance on-line. Booking procedures are already covered by Part 3 of the DDA 1995 so should be accessible to disabled people. This means that if telephone bookings are accepted a textphone should be available, websites with on-line booking should be accessible and premises open to the public should be accessible. The monitoring study found that textphones were generally not provided by airlines, travel agents and tour operators that took part in the mystery shopping study. The proposed EC regulation will require the industry to ensure all points of sale enable a passenger to request assistance and may prompt change. Other methods to ensure that the method of booking is accessible to all disabled people may also need to be considered.

Reasonable provision of pre-journey information, such as general information about services and specific information about arrangements for disabled passengers, in accessible formats is required under Part 3 of the DDA 1995. It was, therefore, hoped a high proportion of the industry would comply with the Code's recommendations for the availability of pre-journey information in accessible media. The findings show that whilst progress was being made with website accessibility and information on websites, the provision of pre-journey information in alternative media, such as large print, audio tape, Braille or computer disk, remains low. This is despite promotion of DDA duties to their members by organisations such as ABTA, the Federation of Tour Operators and the British Air Transport Association (BATA). It appears that the industry requires further encouragement to comply with their DDA duty and provide accessible information.

The Code describes procedures that should be followed for pre-booking assistance, establishing whether a passenger is self-reliant, seat reservations and provision of additional seats.   The interviews with airlines suggested that they had introduced new procedures to increase the number of disabled passengers pre-booking assistance. ABTA has also promoted the Code to their members. Unfortunately, no increase in the number of passengers pre-booking assistance or reporting that they

had been offered assistance was found in either the mystery shopping study[17] or disabled passenger survey carried out in 2005 compared to 2004. Disabled people reported that the systems to obtain assistance were often confusing or complex. It appears passengers booking flights often have to contact the airline directly by telephone to obtain assistance and this may not be the same telephone number used to book a flight. Pre-booking assistance is not always a standard part of the booking process and staff taking bookings do not ask all passengers if anyone in their party will require assistance.   The study also found that few passengers received confirmation that their request for assistance had been dealt with, as the Code suggests.

The proposed EC regulation may improve the process and ensure those not currently following the Code's recommendation to provide an accessible facility. Under Article 9 of the proposed EC regulation, air carriers or tour operators will be required to facilitate taking requests for assistance at all points of sale, including sell by telephone and the Internet.   However, some passengers, especially those travelling for the first time, may not anticipate their needs in advance so may not request assistance. It is therefore important that the Code's recommendation that all passengers are asked if anyone in their party will require assistance be followed and staff taking bookings are able to help passengers assess their needs. The proposed EC regulation will require a system to be devised to track notifications of assistance and give a confirmation code, although it is not clear who will be responsible for issuing the confirmation to the passenger. This may address the lack of confirmation currently provided.

Not all the airlines interviewed in the monitoring study followed the Code's recommendation to permit disabled passengers to pre-book seats. Those that did offer the facility may have only allowed pre-booking on certain flights or it incurred a charge. The airlines that did not offer pre-booking explained this was due to how charter airlines sold seats to tour operators or was because 'no frills' airlines did not have seating allocations. There was a perception among a few airlines that *'all the seats were the same'*. Most disabled passengers were happy with their seat allocation; those that were not complained about the difficulties transferring to a window seat or not being seated with companions. It appears the information provided by airlines to handling agents to allocate seats varied and was often linked to the airline's evacuation policy. Some airlines would not allocate an aisle seat to a disabled passenger as this was believed to hinder evacuation of the aircraft. Annex II of the proposed EC regulation states that airlines must

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[17] It should be noted that the mystery shoppers did not make bookings and this may have affected the results.

make *"all reasonable efforts to arrange seating to meet the needs of individual disabled persons or persons with reduced mobility on request and subject to safety requirements and availability"*. The CAA safety regulations only prohibit the seating of disabled passengers in exit rows. Clearer guidance may be required on whether aisle seats are subject to safety requirements. Information should also be made available to staff allocating seats (including handling agents) on which rows have moveable armrests, which makes transfer easier.

Few airlines complied with the Code's recommendation to provide an additional seat for an escort, or if the person required an additional seat because of their disability, at a discount on the full fare and, from the explanations that were provided, it appears this policy is unlikely to change. It is more likely that airlines will comply with the requirement in the proposed EC regulation that states that *"where a passenger with reduced mobility is assisted by an accompanying person, the air carrier shall make all reasonable efforts to give this person a seat next to the person with reduced mobility."*

The interviews indicated that some airlines did not have a clear policy on determining self-sufficiency or criteria for determining if a passenger needs to travel with an escort. They also indicated that an airline may restrict the number of disabled passengers on a flight on safety grounds. The proposed EC regulation should prevent disabled people being refused to embark a flight due to their disability. It states if a passenger cannot fly due to safety regulations or aircraft size (i.e. too small to board or carry disabled people), the airline will be required to notify the passenger in writing why they cannot board the flight and refund the fare or offer an alternative flight. The proposed regulation would also require airlines to make their policies for the carriage of disabled passengers, including safety rules and restrictions on their carriage, publicly available in accessible formats. It would be useful to clarify the relevant safety regulations and how they should be applied in these cases with the CAA, to help airlines develop consistent policies.

Another area where progress had been made in the last 18 months was with the implementation of some access audit findings and development of strategies to improve the accessibility of airport terminals. However, as the monitoring study did not cover airports that were not audited in 2004, it is not clear if other airports have made similar changes. Generally, the airport operators said the changes had been prompted by the introduction of new Part 3 DDA duties for airport operators relating to physical access of facilities. This means that similar changes could have occurred elsewhere.   The changes that were made did not always follow all aspects of good practice and usually failed in the detailed

requirements, for example, the toilet door was too heavy. This means some disabled people would have difficulty using the facility or would be unable to use it. Airport operators may need to introduce procedures to ensure that the designs adopted are inclusive to all disabled people.

Few changes in the availability of help points at points of arrival were reported in the monitoring study, suggesting that provision is still limited, although this may change if the proposed EC regulation is introduced. To obtain assistance, the proposed EC regulation states that designated points should be established at least at main entrances to terminal buildings, check-in areas, public transport interchanges and airport car park. The proposed regulation does not state what form a 'designated area' should take but it is strongly recommended that the guidance in the Code for help points be followed and installed in these areas. Given it is usual practice for disabled passengers to use a range of long and short term car parks at larger UK airports, it would be more appropriate to ensure that transfer from all these car parks was accessible, as recommended in the Code, in line with EC regulation.

Assistance provision was an area that had not undergone much change since 2004. This was largely because airlines and airport operators said they were awaiting the outcome of the proposed EC regulation. This regulation would change how assistance is provided at the airport. Airport operators would have overall responsibility for providing comprehensive assistance to disabled people and those with reduced mobility from the point of arrival to the departure. This includes assistance at the airport and boarding the aircraft to the seat. The cost of the assistance would then be charged to airlines, proportional to the number of passengers carried by each airline at each airport. Currently, the airport operator covers the cost of assistance to check-in and the airline from check-in. The changes should mean the service is seamless and address some of the weaknesses in assistance provision identified in this study. For example, non-wheelchair assistance, such as guiding hearing and vision impaired passengers through the airport, must be provided. Currently, some airlines and airports only fund wheelchair assistance which can lead to people with sensory impairments being offered inappropriate assistance. The proposed regulation would require passengers to be assisted moving to toilet facilities, but not other facilities such as shops or cafes as some disabled passengers in the survey would have liked.

The proposed regulation also states that assistance must be provided if the passenger notifies the air carrier or tour operator at least 24 hours before departure. If this advance notice period is not met, all reasonable efforts to provide assistance must be made. The 2004 and 2005 studies

found that it was usual practice in the UK to meet all reasonable requests for assistance. Disabled people will, however, need to be informed that they will only be guaranteed assistance if they pre-book. As already indicated airlines will have a responsibility for ensuring facilities are provided to enable people to pre-book and that information is available. There may be further need to ensure that this information is publicised widely and all passengers are aware of the benefits of pre-booking assistance.

DDA 2005 gave the Secretary of State the power to lift the exemption for aircraft from Part 3 and introduce regulations. These regulations would cover aspects not already covered by the DDA such as the service on board the aircraft during the flight and, possibly, aircraft design. The findings of the monitoring study found few changes in the service provided on board since 2004. This may suggest that UK regulations are required, but the proposed EC regulation could have an impact on service levels and so need to be taken into consideration.

The monitoring study found that certain aspects of assistance the Code describes, such as assisting a disabled passenger move to the toilet facility using an on-board wheelchair or assisting passengers with cutting food, were not always provided by airlines. The airlines that did not provide this assistance cited health and safety reasons for not helping a passenger use an on-board wheelchair, although the Code does not require cabin crew to lift passengers. Those not assisting with cutting food felt the passenger should be able to cut their own food under the self-sufficiency criteria. This interpretation of the self-sufficiency criteria should be clarified.

Not all airlines provided an on-board wheelchair that could be used during the flight to assist passengers to and from the toilet. This may change if the proposed EC regulation is introduced. It states that assistance in stowing and retrieving hand luggage and moving to toilet facilities must be provided, but does not state how passengers should be assisted moving within the aircraft.   There is no requirement to provide an on-board wheelchair or assist passengers with cutting food.

The study found that airlines and disabled people felt the design of on-board wheelchair could be improved. This concern may be addressed following publication of the DPTAC specification for on-board wheelchairs.

A lack of information available in alternative media for disabled passengers on board aircraft was also found. This is a particular concern for safety information. Only one vision impaired passenger who took part in the 2005 survey said they received a personal safety briefing

on the flight and, whilst some airlines provided Braille versions of safety instructions, not all vision impaired people read Braille. Large print versions were not usually available.   Passengers with a hearing impairment participating in the 2005 survey indicated that sub-titles were not always available on safety videos.   Sub-titles may be more appropriate on videos as people with a less severe hearing impairment may not be familiar with sign language.   It is not clear if information on board the aircraft is covered by the proposed EC regulation which states airlines must *"communicate essential information concerning a flight in accessible formats"* or this only refers to flight information at the airport. It does not appear that the needs of learning disabled people are considered when producing safety information so the standard safety cards or briefing may not be appropriate. This issue should be investigated.

The proposed EC regulation will require airlines to permit recognised assistance dogs in the cabin. This was an area where progress with the Code's recommendation to permit assistance dogs in the cabin had been made since 2004. It was common for airlines to have developed policies relating to the carriage of assistance dogs and implemented the scheme on PETS approved routes.   There were, however, differences in airline policies, such as whether a charge was made for an additional seat or to cover the cost of the dog being checked by an animal clearing agent. None of the airports in this study provided a dog relief area for assistance dogs, as described in the Code.   Airports will need to address this issue and consider how dogs should travel through the airport, as part of their responsibility for assistance provision.

The other requirement for airlines proposed by the EC regulation is for the airline to transport up to two pieces of mobility equipment in addition to medical equipment free of charge (including electric wheelchairs) and to compensate passengers whose equipment is damaged in transit. Currently, airlines carry at least one piece of mobility equipment free of charge, but some airlines place a restriction on the weight of the wheelchair for the health and safety of ground handling staff. It is unclear whether the regulation would address the latter issue. A common concern among disabled passengers was damage to wheelchairs. Airlines, however, felt the incidence was rare so had not prioritised the issue since 2004 so no changes in how wheelchairs were loaded or protected were reported in 2005. Airlines did raise concerns about passengers under-insuring their wheelchairs. All the airlines interviewed offered compensation but the level they are liable for under international agreements does not necessarily cover the full value of the wheelchair. In practice some airlines do compensate to the full value.

This issue does not appear to have been addressed in the proposed EC regulation. The regulation should, however, improve the current situation and ensure passengers whose wheelchair is damaged or lost are provided with a temporary replacement.

Aircraft design was not an area found to have changed greatly since 2004. The recommendations in the Code incorporate those suggested by ECAC for aircraft design. This is partly because refurbishment and commissioning of aircraft covers several seasons so new aircraft, which the Code could have influenced, are only just beginning to be introduced to the fleet. It is therefore difficult to assess the effectiveness of the Code on aircraft design. The newly refurbished aircraft that were viewed for the monitoring study had incorporated some changes recommended by the Code such as a greater use of colour and tonal contrast, new toilet fittings, additional handrails within the designated toilet and the provision of seats with moveable armrests. Other changes were compromised by the existing aircraft design, for example the provision of a toilet large enough to accommodate an on-board wheelchair and assistant. This had led to the adoption of solutions involving the use of curtains or temporary door fixings to increase the amount of space available adjacent to the toilet. Some disabled passengers may not consider these solutions acceptable. Airlines were most likely to have addressed the recommendation for the installation of moveable armrests on at least 50% of economy class seats on new and refurbished aircraft, but recommendations for toilet design, handrails, signage, lighting and the use of colour and tonal contrast within cabins were not addressed to the same extent.

Smaller airlines reported that they felt they had little influence over the design of aircraft and it was the responsibility of manufacturers to incorporate good practice. The design of many aircraft models has already been determined and airlines have limited options when purchasing these aircraft. It appears that the Code has a greater potential to influence the design of new aircraft models if a UK airline is involved in the design stage. Generally, larger airlines said they would use the Code to help design new aircraft, along with guidance published by DPTAC. DPTAC has also been working with airlines and manufacturers of small and large aircraft to develop a good practice specification for toilets, which may have an impact in the future. Smaller airlines tend to purchase used aircraft or lease aircraft, so the only changes made tend to be to seats, upholstery and carpets. This means restrictions on toilet design for on-board wheelchairs will continue for the foreseeable future.

There are, however, recommendations in the Code that are not restricted by existing fittings or dimensions, such as improved signage, lighting and the use of colour and tonal contrast within the cabin and toilets. Handrails could also be fitted within aircraft toilets. The airlines said that they had been hindered in making such changes to lease aircraft because the aircraft have to be returned in the same state they are obtained. This barrier will need to be overcome to improve the accessibility of aircraft in the short term.

Regulations for aircraft design may ensure that accessibility is addressed, especially by airlines who will only implement changes if they are required to by regulation, but it is unclear whether this would be practicable. It is likely that with the current level of refurbishment and purchasing of new aircraft it will take some time for any regulation to have an impact. However aircraft manufacturers are working towards improving accessibility. The issue of making changes to lease aircraft also needs to be considered. The proposed EC regulation does not cover the physical design of aircraft and only states that air carriers have a:

> *"clear duty to ensure that…aircraft are planned, designed, built and refurbished in consultation with organisations representing disabled people and people with reduced mobility and in a way that respects their access needs."*

Regulation at a European level would have a greater impact as the number of aircraft it could influence is greater. Manufacturers are more likely to incorporate the requirements in the standard design if it applies to a greater market share. The UK market share may be too small to influence the standard design of new aircraft and the cost of making bespoke changes may be prohibitive for some airlines.

The proposed European regulation appears to cover aspects of service on board aircraft, but not all the recommendations in the Code. If the European regulation is accepted as covering the minimum level of service that should be provided, additional UK regulation does not appear worthwhile. However, it is a concern that safety information is not currently accessible to all disabled people and this needs to be addressed. It may be possible to amend existing UK safety regulations to incorporate this requirement or the CAA could issue guidance. It will be useful if the Code is updated and used to support the EU regulations.

5 Recommendations

The following recommendations are made based upon the findings:

- The Code should be updated to reflect the changes in responsibility resulting from the European regulation. The Code's recommendations should show how airlines and airports can meet their obligations and suggest good practice to enhance this service.

- The Department for Transport should liaise with leasing companies to find out how the Code's recommendations could be incorporated in refurbishments within leasing agreements.

- The industry needs further encouragement to follow those parts of the Code already covered by Part 3 of DDA 1995. Procedures to increase pre-booking assistance and the provision of information in alternative media need to be promoted. Travel agents, tour operators and airlines need to ensure their staff ask all passengers if anyone in their party requires assistance.

- Safety regulations should be reviewed with the CAA to help airlines develop consistent policies regarding the carriage of disabled passengers and seat allocations. The CAA could also consider the accessibility of safety information for all disabled passengers.

- Airlines should incorporate those changes that are not restricted by physical limitations of the aircraft when being refurbished, for example moveable armrests, signage, handrails, lighting and colour and tonal contrast.

- Airlines should ensure that their staff, and their handling agents' staff who allocate seats have the knowledge to assess what is the most appropriate seat for people with different types of disability. Passengers that need to transfer to and from an on-board wheelchair should be allocated a seat on a row with moveable armrests.

- Airlines need to ensure that check-in staff confirm whether a passenger has pre-booked assistance and, if not, have the skills to be able to assess whether a passenger needs assistance and what the most appropriate assistance would be.

- Airports need to consider the availability of help points in areas where people need to request assistance and the provision of facilities for assistance dogs. Airports could also consult the good practice guidance recommended in the Code when planning and designing new facilities. They need to ensure architects and designers are familiar with the Code and have access to relevant good practice documents. Procedures could also be introduced to

ensure that standards are followed and new facilities follow good practice.

- Airports that had established working groups and had an individual who was responsible for accessibility appeared to be the most successful at implementing changes and influencing business partners. This approach should be considered by other airports.

- Once airports become responsible for assistance provision, they should consult the Code to develop service level contracts for assistance provision at the airport. They need to consider how assistance should be delivered, equipment used and staff training.

- DPTAC's guidance for disabled people travelling by air should be updated to reflect changes in European legislation. Airlines, airports, travel agents and tour operators could promote the availability of the guide among their customers.

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