

Guidance on quality standards under Regulation EC 1107/2006

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Introduction

1. The aim of Regulation EC1107/2006¹ concerning the rights of disabled persons and persons with reduced mobility when travelling by air (“the Regulation”) is to ensure that such people have the same opportunities for air travel as those of others, in particular that they have the same rights to free movement, freedom of choice and non-discrimination.
2. In relation to airports, the requirements of the Regulation deal mostly with the assistance that airports are required to provide to disabled persons and persons with reduced mobility to help them move around the airport and embark or disembark the aircraft (usually through a contracted service provider). Given this, it is imperative that airports set appropriate quality standards for this assistance to ensure that it is delivered to an acceptable standard.
3. It is also important that these service quality standards, and the performance against them, are made public so that disabled persons and persons with reduced mobility can have the confidence to travel, knowing that their assistance needs will be met; and also, so that they can hold the airport to account if the assistance provided by the airport did not meet expected levels. Making this information public may also allow these passengers to incorporate airport performance into their decisions over which airports to fly to and from.
4. The purpose of this guidance is to help clarify the requirements of the Regulation in relation to the setting, monitoring, and publication of service quality standards, to ensure that the objectives of the Regulation are met, and to help give passengers the confidence to travel, knowing that their assistance needs will be met.
5. This document refers to Regulation EC1107/2006 throughout. In preparation for the UK’s withdrawal from the European Union, the Government is in the process of ensuring the full body of European law is incorporated into the UK’s legal system. There will therefore be no change to the obligations of airports and the CAA with respect to disabled persons and persons with reduced mobility after the UK leaves the EU.

¹ <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex%3A32006R1107>

Chapter 1

Publication of quality standards

6. Article 9(3) requires airports to publish their quality standard documents. These should be separate to any service level agreement with the service provider.
7. It is important to ensure that a passenger can identify quality standards quickly and easily on an airport's website. Quality standards documents should be published on the 'accessibility' sections of airport websites.

Chapter 2

What the quality standards should contain

Legal framework

8. The importance of setting, monitoring, and publishing service quality standards is recognised in Article 9 of the Regulation. Article 9(1) requires that airports with 150,000 commercial passengers or more "set quality standards" for the assistance specified in Annex I of the Regulation and that these quality standards are published (Article 9(3)). Under Article 14 there is a specific obligation on the CAA, as the UK National Enforcement Body, to "where appropriate...take the measures necessary to ensure that the rights of disabled persons and persons with reduced mobility are respected, including compliance with the quality standards".
9. The Regulation states that airports must set the quality standards for the items listed in Annex I of the Regulation and that "full account" must be "taken of internationally recognised policies and codes of conduct...notably the European Civil Aviation Conference (ECAC) Code of Good Conduct in Ground Handling for Persons with Reduced Mobility (Annex 5-C to ECAC Doc 30 Part 1 Section 5)²". The airports must set quality standards, and determine resources for meeting them, in cooperation with airport users and "organisations representing disabled passengers and passengers with reduced mobility".
10. The Regulation also allows for airports to agree higher standards, or provide additional services, for travelling with particular carriers. However, an airline may be required to pay an additional fee per passenger to the airport for this enhanced service.

The ECAC Code and service standards

11. The ECAC Code at paragraph 7 (service standards and performance monitoring) provides a number of timeframes and percentage standards for assistance (these metrics are covered in more detail in subsequent sections of this guidance). Paragraph 9.1 of the ECAC Code specifies also that there should be "regular reviews to monitor the service provider's performance against the quality standards and to continually improve performance-monitoring systems."
12. The Code also states that the metrics referred to in paragraph 7.5 "represent the minimum levels of service". They do not cover all the areas of assistance that airports

² <https://www.ecac-ceac.org/documents/10189/51566/Doc+30+Part+I+12th-Dec+2018%5B1%5D.pdf/2f8b7268-82d5-4d7b-aab4-1b4c097056ae>

are required to provide under Annex 1 of the Regulation. The Code proposes that the metrics in paragraph 7.5 should be supplemented by a number of broader performance measures, including that

- all customers should be satisfied with the assistance provided;
- subject to pre-notification, 100% of departing customers who are at the designated point within the stipulated time should reach their aircraft in time to enable timely pre-boarding and departure;
- all employees, including the management, who deal directly with the travelling public at airports, should receive training that meets the minimum standards as defined in ECAC Doc 30, Part 1, Section 5 and “training should respect the principles set out in Annex 5-G and training courses should be developed in partnership with recognised national and European forums of people with disabilities”.

13. It is the CAA's view that airports should implement every recommendation in the ECAC Code. The recommendations will deliver a performance framework that is compliant with Article 9 of the Regulation. It also, more meaningfully, should ensure that airports are able to give disabled persons and those with reduced mobility the confidence to travel knowing that their assistance needs will be met; to allow disabled persons and those with reduced mobility the ability to incorporate information on the performance against the standards in their consumer decision-making; and to enable people to better hold the airport to account if the assistance provided by the airport does not meet their expectations.

Departing passengers

14. Each quality standards document should include a requirement, as set out in the ECAC Code (paragraph 7.5), that "subject to pre-notification, 100% of departing customers who are at the designated point within the stipulated departure time should reach their aircraft in time to enable timely pre-boarding and departure". This will ensure that all passengers who have pre-notified at least 48 hours before travel and arrive either at check-in, or at a designated point, at the times requested by the airline (or if no time is provided arrive no later than one hour at check-in, or two hours at a designated point, before the flight time (Article 7 of the Regulation)) will be provided with assistance that will get them to the gate on time and be pre-boarded.
15. For passengers who have not pre-notified 48 hours before travel, the airport (or service provider) must make "all reasonable efforts" to get disabled persons and persons with reduced mobility to the gate on time (Article 7(3)). The CAA's view is that airports should not attempt to quantify this in terms of a percentage. However, airports should note that the European Commission, in its 'Interpretative guidelines'³ for the

³ http://ec.europa.eu/transport/themes/passengers/air/doc/prm/2012-06-11-swd-2012-171_en.pdf

Regulation, expects airports "to take a proactive role in seeking to meet any request for assistance".

16. Airports should record and investigate each incident of a user of the assistance service missing their flight due to them not being assisted to the flight in time. The investigation should determine the cause, or causes, of the service failure. A summary of the findings of the investigation for each incident should be submitted to the CAA and should be published on the airport's website.
17. The ECAC Code (paragraph 7.5) stipulates targets for waiting times at landside "designated points", including those outside the terminal building once passengers have made themselves known and before assistance is provided. These should be adopted as minimum standards and it should be made clear that this includes all "designated" points within the terminal boundary or under the direct control of the airport. This includes landside reception areas (where it is assumed waiting times would be minimal) and check-in desks. However, it also includes designated points in, for example, car parks and train stations. For these designated points, the time at which people have let themselves be known is generally when they call on the help point. The time for assistance is once the passengers have been met in person by a staff member.

Transit passengers

18. To meet the obligation listed under Annex 1 of the Regulation to "reach connecting flights when in transit", each document should state that, subject to "minimum connection times", all passengers who have pre-notified at least 48 hours prior to travel should reach their connecting aircraft to enable timely pre-boarding and departure. For those that have not pre-notified, airports must "make all reasonable efforts" to ensure that the passenger reaches the gate on time (again, the CAA's view is that this should not be quantified).
19. Airports should record and investigate each incident of a user of the assistance service missing their connecting flight due to them not being assisted to the flight in time. The investigation should determine the cause, or causes, of the service failure. A summary of the findings of the investigation for each incident should be submitted to the CAA and should be published on the airport's website.

Arriving passengers

20. The ECAC Code only recommends targets for arriving passengers in relation to assistance being available at the gate or aircraft side. Waiting times for passengers
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arriving on flights served by air bridges should be measured from the time that the assistance for each passenger is available at the gate, and flights not served by air bridges should be measured from the time that the assistance is available for each passenger at the aircraft side. These should be adopted as minimum standards.

21. Airports should record and investigate each incident where the assistance for each passenger (both pre-notified and non-notified) is not available within 45 minutes of 'on chocks'. The investigation should determine the cause, or causes, of the service failure. A summary of the findings of the investigation for each incident should be submitted to the CAA and should be published on the airport's website.
22. Airports should endeavour to measure the passenger journey on arrival in totality (i.e. from gate to designated arrival point). However, there are factors which delay passengers that are outside the airport's control, such as time spent at baggage reclaim and immigration.
23. Given these difficulties, the CAA's view is that airports need not stipulate quantitative metrics for waiting times for the assistance provided during the arriving passenger journey so long as, once the passenger is disembarked, the airport assists the passenger through the airport either in one continuous 'movement' once deboarding is complete, i.e. directly from the arrival gate, through immigration and baggage reclaim, and to the final designated point, without a break in the assistance. This may include short 'handovers' between staff, equipment or both. The ECAC Code (paragraph 5.2) recommends that "handover points should be avoided where possible. Where they cannot be avoided, procedures must be in place to ensure that there is a continuity of service and that the passenger is not forgotten or left for too long". There should be a maximum of one handover before the arrivals hall. In addition, there can be one handover after the arrivals hall if it is necessary to use alternative equipment to go outside the terminal building. Those airports that use handover points must agree a performance metric with the CAA to help ensure a seamless service. The CAA strongly recommends that an airport does not use 'holding' areas where passengers must wait for further assistance once disembarked from the aircraft. If one is used, strict performance metrics must be agreed with the CAA.

Passenger surveys

24. The Code recommends that airports conduct regular passenger surveys of disabled persons and persons who are less mobile. The CAA's view is that such tools are necessary to give airports a more complete assessment of the quality of the assistance provided to these passengers, particularly in areas such as staff attitudes, behaviours and customer service skills.
25. The CAA's preference is that each airport should conduct its own regular surveys of passenger satisfaction. However, to address the burden of running such surveys on

smaller airports, the CAA hosts a satisfaction survey which is available for those UK airports to use who do not have their own surveys. It covers key areas set out under Annex 1 of the Regulation. It can also be 'branded' as being from the airport, rather than the CAA. To ensure qualitative metrics are used consistently and universally, airports' own surveys must include the key areas of the passenger journey covered in the CAA survey and be approved by the CAA before being used.

26. We expect UK airports to actively advertise and promote a satisfaction survey to passengers. To help ensure representative sample sizes, airports should collect the email addresses of users of the service that are willing to participate, and then email these individuals post-travel to encourage them to complete the survey. For smaller airports, the CAA recommends as many email addresses are collected as possible and for larger airports we recommend a consistent approach for collecting email addresses (for example, one in five passengers). If airports wish to use additional methods for their survey, these must be agreed with the CAA.
27. Airports should ensure that the surveys are able to capture feedback on assistance provided to people with 'hidden disabilities'. This may be better achieved through a separate 'hidden disabilities' survey for passengers who request this type of assistance.

Chapter 3

Consultation

28. Article 9(1) of the Regulation requires that airports set quality standards, and determine resources for meeting them, in cooperation with airlines through the Airport Users Committee, if one exists. It is the CAA's view that if one does not exist, the airport must ensure it arranges for an alternative form of consultation which includes all airlines operating from the airport.
29. Airports must also set quality standards, and determine resources for meeting them, in cooperation with "organisations representing disabled passengers and passengers with reduced mobility." The Department for Transport Code of Practice for Access to Air Travel for Disabled Persons and Persons with Reduced Mobility⁴ suggests that airports could involve "local access/disability groups whose membership would include users of airports" and provides a list of questions which airports can use to assess the suitability of groups (paragraph 5.3 of the Code of Practice). Organisations or individuals representing a wide array of disabilities and mobility issues should be consulted. Consulting with individual passengers who travel from the airport regularly is also an option (perhaps those who have made complaints or compliments to the airport about the assistance service). Consultation should be done by convening regular forums containing representatives of disability groups and disabled individuals, in particular those that travel through the airport and use the assistance service. Annex 8 of the Department for Transport Code of Practice sets out guidelines which may be helpful in deciding membership of the forums. The CAA strongly recommends that such forums are chaired by representatives of disability organisations or disabled individuals and members are either disabled or care for family members who are disabled. It is important that airports set out clear expectations of members and explain how their advice will be used by the airport.
30. As a minimum, accessibility forums should meet twice a year and be involved in discussions about
- setting quality standards
 - reviews of performance against the quality standards
 - reviews of performance-monitoring systems

⁴<http://webarchive.nationalarchives.gov.uk/+http://www.dft.gov.uk/transportforyou/access/aviationshipping/accesstoairtravelfordisabled.pdf>

- awarding contracts to service providers
- providing advice on the accessibility of planned new terminals or refurbishment of old terminal buildings
- providing advice on the accessibility of facilities, equipment and services
- training programmes
- designating points of arrival and departure
- practical inspections of airport services (generally using 'walk-throughs').

31. Quality standards documents should make clear that consultation has taken place and list who was consulted; when they were consulted; and how their views were considered (for airlines, individuals and disability organisations).
32. Each airport should survey members once a year on their views on the effectiveness of the forums, covering key areas set by the CAA. The results of the surveys should be submitted to the CAA and published on the airport's website.

Chapter 4

Monitoring performance against quality standards

33. Paragraph 9.1 of the ECAC Code specifies also that there should be “regular reviews to monitor the service provider’s performance against the quality standards and to continually improve performance-monitoring systems.” Further it states that service providers “should be expected to introduce their own performance monitoring systems and to provide reasonable data as required by the airport community”.
34. Airports should collect data that measures performance in relation to the quality standards document. Airports should submit to the CAA and publish on its website information on its performance against its quality standards twice yearly (generally on a seasonal basis and within one month after each season). This should include detailed information on
- performance against ECAC quantitative metrics
 - incidents where a passenger’s flight has departed without them
 - incidents where a passenger’s connecting flight has been missed
 - incidents where assistance is not available at the gate / aircraft side within 45 minutes of on chocks for arriving passengers
 - the results of any in-house and CAA passenger surveys
 - outputs of ‘Accessibility Forums’
 - results of the survey of ‘Accessibility Forum’ members.

Chapter 5

Definition of rankings

Definition of rankings from 2019 (and from 2020)

Good

This means the following:

Departing passengers

- Over the whole year, 99% (99%) of all departing notified disabled passengers and those with reduced mobility are provided with assistance within 30 minutes of making themselves known at a designated point.
- Over the whole year, 99% (99%) of all departing non-notified disabled passengers and those with reduced mobility are provided with assistance within 45 minutes of making themselves known at a designated point.
- The airport scores an average rating of 3.5 (where 1 is very poor and 5 is excellent) or better in the satisfaction survey of users.

Arriving passengers

- For each month, for at least 95% (96%) of arriving pre-notified disabled passengers and those with reduced mobility, assistance is available for each passenger within 20 minutes from 'on chocks'.
- For each month, for at least 95% (96%) of arriving non-notified disabled passengers and those with reduced mobility, assistance is available for each passenger within 45 minutes from 'on chocks'.
- Over the whole year, for at least 97% (98%) of arriving pre-notified disabled passengers and those with reduced mobility, assistance is available for each passenger within 20 minutes from 'on chocks'.
- Over the whole year, for at least 97% (98%) of arriving non-notified disabled persons and persons with reduced mobility, assistance is available for each passenger within 45 minutes from 'on chocks'.
- The airport consistently meets agreed "continuous journey" standard for arriving passengers.
- The airport scores an average rating of 3.5 (where 1 is very poor and 5 is excellent) or better in the satisfaction survey of users.

Oversight and engagement

- The airport publishes on its website, and submits to the CAA, information as set out in paragraph 34.

- The airport has robust processes in place for overseeing how it measures its performance; or, where relevant, the airport has committed to strengthen this oversight.
- The airport pro-actively promotes the satisfaction survey of users of the service, with both physical and 'hidden' disabilities.
- The airport engages effectively with disability organisations through an 'Accessibility Forum'.

Very good

Departing passengers

- 99% of all departing notified disabled passengers and those with reduced mobility are provided with assistance within 30 minutes of making themselves known at a designated point.
- 99% of all departing non-notified disabled passengers and passengers with reduced mobility are provided with assistance within 45 minutes of making themselves known at a designated point.
- The airport scores a rating of 4 or better in the satisfaction survey of users (where 1 is very poor and 5 is excellent).

Arriving passengers

- For each month, for at least 97% (98%) of arriving pre-notified disabled passengers and those with reduced mobility, assistance is available for each passenger within 20 minutes from 'on chocks'.
- For each month, for at least 97% (98%) of arriving non-notified disabled passengers and those with reduced mobility, assistance is available for each passenger within 45 minutes from 'on chocks'.
- Over the whole year, for at least 98% (99%) of arriving pre-notified disabled passengers and those with reduced mobility, assistance is available within 20 minutes from 'on chocks'.
- Over the whole year, for at least 98% (99%) of arriving non-notified disabled passengers and those with reduced mobility, assistance is available for each passenger within 45 minutes from 'on chocks'.
- The airport consistently meets agreed "continuous journey" standard for arriving passengers.
- The airport scores a rating of 4 or better in the satisfaction survey of users (where 1 is very poor and 5 is excellent).

Oversight and engagement

- The airport publishes on its website, and submits to the CAA, information as set out in paragraph 34.

- The airport has robust processes in place for overseeing how it measures its performance.
- The airport pro-actively promotes the satisfaction survey of users of the service, with both physical and 'hidden' disabilities.
- The airport engages effectively with disability organisations through an 'Accessibility Forum'.

Needs improvement

- Over the course of the reporting year the airport has failed to meet all the criteria for a 'good' performance standard. However, the airport has taken the necessary steps during the year to identify the issues with its assistance service and to improve its performance.
Or;
- Over the course of the reporting year the airport has failed to provide the CAA with the required information on its performance.

Poor

- Over the course of the reporting year the airport has failed to meet all the criteria for a 'good' performance standard. Further, the airport has not taken the necessary steps during the year to identify the issues with its assistance service and to improve its performance.