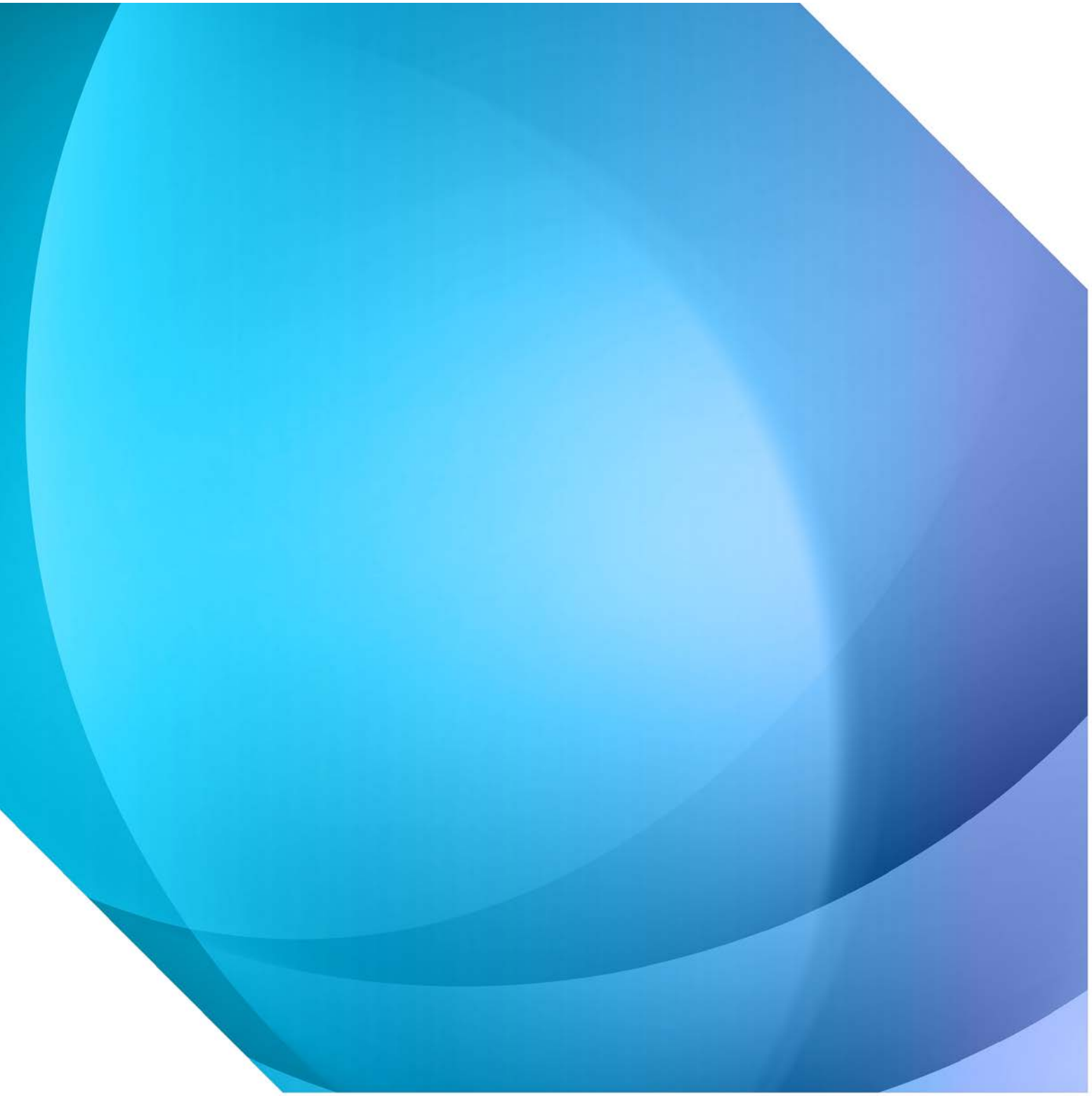
DRAFT: Guidance for airlines on assisting people with hidden disabilities

CAP 1603



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Introduction

1. In November 2016, the CAA published guidance for UK airports on providing assistance to people with hidden disabilities (CAP1411). We are now publishing similar guidance for airlines applicable to all flights from the UK and for flights to the UK on an EU registered airline. This guidance for airlines complements CAP1411. As with CAP1411, this guidance has been produced following discussions with a number of key disability organisations. It has also been produced following in depth research by the CAA into the current processes used by airlines and airports to capture and transmit information about passengers' assistance needs when travelling by air. The results of this research have helped inform this guidance, particularly paragraphs 2.3 to 3.1.

2. The aim of Regulation EC1107/2006 (the Regulation) concerning the rights of disabled persons and persons with reduced mobility when travelling by air is to ensure that disabled people have the same opportunities for air travel as non-disabled people, in particular that they have the same rights to free movement, freedom of choice and non-discrimination. The Regulation covers "any person whose mobility when using air transport is reduced due to any physical disability (sensory or locomotor, permanent or temporary), ***intellectual disability or impairment***, or any other cause of disability, or age". It is the CAA's view, based on engagement with disability organisations, that hidden disabilities should be considered to include, but not be limited to, dementia, autism, learning disabilities, anxiety issues, mental health conditions, visual impairments and hearing loss.

3. The purpose of this guidance is to help clarify the requirements of the Regulation (in light of the relevant guidance from the CAA, the European Commission and European Civil Aviation Conference (ECAC)) in relation to providing assistance to people with hidden disabilities. This includes communication of information prior to travel and at the airport; obligations in regard to "pre-notification"; assistance at the airport for areas that are the responsibility of the airline; direct assistance onboard the aircraft; and assistance during flight disruptions. Although this is specific guidance on the Regulation, the CAA notes that it is good practice, and indeed would represent good customer service, for airlines to understand how hidden disabilities can affect passengers' experience of the whole customer journey and the implications of this for the service they provide.

Chapter 1

Prevention and refusal of carriage

1.1 Under the Regulation

a. Article 3 states that an airline, its agent or a tour operator must not refuse travel on the grounds of disability or reduced mobility unless it must do so to meet applicable safety requirements (Article 4).
b. Article 4.2 allows airlines to request that a person be accompanied by another person who is capable of providing assistance.
c. Article 4.3 states that carriers must make publicly available, in accessible formats, the safety rules that it applies to the carriage of disabled people and persons with reduced mobility.

1.2 Due to the diverse nature of the needs of people with hidden disabilities, and also because the disabilities may not be immediately obvious, it is important that any decisions to refuse travel are taken from an informed viewpoint. For example, processes for medical clearance and safety restrictions should have regard to people with hidden disabilities. Information on restrictions on travel as a result of safety rules should be in “accessible formats” (see paragraph 2.5).

1.3 It can sometimes be the case that, when under stress, a person with a hidden disability can exhibit certain challenging behaviour. The CAA is aware of a number of instances where this has led to the passenger being denied boarding. In instances where such challenging behaviour arises, it is important for airlines to be able to identify that the person has a hidden disability and to take the appropriate action to understand and deal with the underlying issue. Having appropriately trained cabin and flight crew is key to this.

Chapter 2

Information and communication prior to travel, at the airport and onboard the aircraft

2.1 The Regulation states that "In order to give disabled persons and person with reduced mobility opportunities for air travel comparable to those of other citizens, assistance to meet their *particular* needs should be provided at the airport as well as onboard aircraft". People with hidden disabilities have a diverse range of needs. Further, people with a non physical disability can also have a physical disability. Therefore, in order to ensure that the assistance provided will meet the person's particular needs throughout the entire journey, it is critical that individuals are able to provide sufficient information on their assistance needs to the airline, their agent or the tour operator and that, in turn, the airline, their agent or the tour operator is able to pass on this information to both the airport (either directly or to the supplier contracted at that airport to provide the assistance) and to the airline. It is critical also for airports and airlines to be able to pass this information on within their own organisations to ensure that all relevant staff are appropriately informed.

2.2 Under Article 6 of EC Regulation 1107/2006, airlines, their agents and tour operators must "take all measures necessary […] at all their points of sale" to receive information on the assistance needs of individuals. Given that people with hidden disabilities have a diverse range of needs, and that people with a non physical disability can also have a physical disability, it is the CAA's view that the information requested from the individual will generally need to go beyond that required to simply classify the individual according to the commonly used IATA classification system. Airlines, their agents and tour operators therefore must systems and processes in place to receive this additional information from the individual at all points of sale. In terms of how this additional information is gathered in practice, it should be collected as part of the online booking process or through a post booking 'call back' or similar. Provision will also need to be made for individuals to provide this additional information post booking, for example in writing, via email, or over the telephone. Individuals should be able to provide this information without additional charge.

2.3 Airlines, their agents and tour operators will also need to have systems and processes in place to pass on all the information about an individual's assistance needs to the airport or service provider in the form of 'free text' or other similar method. ECAC DOC 30 Section 5.3.2 states that "In order to provide the appropriate assistance, the air carrier should inform on the actual needs of the passenger using the 'free text' box, visible in the messaging system between

airlines and airports (PAL/CAL messaging). This is particularly useful in the case of passengers with invisible disabilities." Annex 5H also states that "the diverse needs of people with hidden disabilities puts significant emphasis on airlines having in place systems that are able to pass on extra information contained within PAL and CAL messages (or other means), in addition to general IATA assistance codes". CAP1411 requires airports to put in place systems that are able to receive extra information through any 'free text' contained within PAL and CAL messages, in addition to general IATA assistance codes.

2.4 Airlines and airports must also have systems and processes in place to ensure that all the information about an individual's assistance needs can be passed on to relevant staff, whether their own or contracted staff (e.g. ground handlers). In the case of airlines, this includes staff working at the airport and onboard the aircraft (i.e. cabin and flight crew). Ideally, all the information about an individual's assistance needs should be associated with the individual's reservation so that all relevant passenger facing staff have access to it through all stages of the passenger journey.

2.5 Under the Regulation airlines must ensure that disabled people and those with mobility restrictions receive "communication of essential information concerning a flight in accessible formats". Clearer and more detailed information on the assistance available for people with hidden disabilities should help to give people greater confidence that the assistance available will meet their individual needs. Airlines should therefore present this information on their websites and through other accessible formats, where requested, in a clear and easy to understand way and accessible for people with hidden disabilities. This can be in the format of videos, photos and pictures. This will aid with familiarisation with air travel and may help ease anxiety and stress for the passenger. At the airport, airline staff, or those contracted by the airline, must make provision for people who are less able to use visual displays or audible announcements by communicating this information in person.

Chapter 3

Boarding and onboard the aircraft

3.1 It is usual practice for disabled passengers and those with reduced mobility to be boarded first. Whilst this practice is generally beneficial to people who need extra assistance, it may not be appropriate for all passengers, especially if boarding is not immediate and passengers are left waiting in unfamiliar surroundings (such as on the airbridge). Ground staff should check if the passenger wishes to board first.

3.2 Under the Regulation, carriers must make all “reasonable efforts to arrange seating to meet the needs of individuals with disability or reduced mobility on request subject to safety requirements and availability”. Because the needs of people with hidden disabilities are diverse, airlines should adapt their seating policies to incorporate such requests (for example, a person might need to sit near a window to ease anxiety and stress). Accommodating such seating requests may require the airline to move other passengers. In order to avoid this situation, airlines should seek information on seating needs as early as possible.

3.3 Under the Regulation, carriers must make all “reasonable efforts” to seat an accompanying person next to a person with hidden disabilities. Notwithstanding any safety considerations, it is particularly important that people with hidden disabilities are not separated from accompanying persons; to do may cause significant anxiety and distress. A person with a hidden disability who travels without an accompanying person should be allocated seats so that visual and audible communication can be established with the cabin crew (ECAC Doc 30 Annex 5F section 6.2c).

3.4 The allocation of seats to people with hidden disabilities and accompanying persons should be done at no extra cost to the individuals concerned.

3.5 Airline staff should be aware that many airports give individual’s with hidden disabilities the option to identify themselves as needing assistance through wearing a suitably designed lanyard, bracelet, or similar.

Chapter 4
Training

4.1 People with hidden disabilities have widely varying needs. Further, such disabilities are often not immediately obvious. To be able to identify that a person has a hidden disability, and to be able to understand and meet their needs, a substantial emphasis must be placed on ensuring that all relevant passenger facing staff have the appropriate training. In particular, training should be provided to crew, ground staff and call centre staff such that they have a clear awareness and understanding of hidden disabilities, know how to identify people with such disabilities, and how to engage and communicate with them and their families and friends.

4.2 The Regulation sets out three obligations in respect of training. Under Article 11 of the Regulation airlines must:

a) "ensure that all their personnel, including those employed by any sub-contractor, providing direct assistance to disabled persons and persons with reduced mobility have knowledge of how to meet the needs of persons having various disabilities or mobility impairments;
b) provide disability-equality and disability-awareness training to all their personnel working at the airport who deal directly with the travelling public;
c) ensure that, upon recruitment, all new employees attend disability related training and that personnel receive refresher training courses when appropriate".

4.3 The Regulation also draws attention to ECAC Document 30 Section 5 annexes on training of staff. This provides more detail on recommended practice, including for training of staff to meet the needs of people with hidden disabilities. Given the varied needs of people with hidden disabilities, training modules should cover awareness of the behaviours of people from the hidden disabilities spectrum, in particular dementia, autism, learning disabilities, anxiety issues, mental health impairments, visual impairments and hearing loss. Training modules should also cover communication with people with hidden disabilities, as well as the practical assistance they are likely to need when travelling by air. Training modules on meeting the needs of people with hidden disabilities should be covered in both initial and refresher training.

4.4 A number of organisations run accreditation schemes for such training. We would like to encourage airlines to participate in these schemes – not only will it improve the ability of staff to recognise people with hidden disabilities and understand their needs, it will also help to reassure passengers that staff training is of an acceptable standard.

Chapter 5

Priority following disruption

5.1 Regulation EC261/2004 Article 11.1 states that, when denying boarding to passengers, airlines must give priority to disabled persons and persons with reduced mobility. For people with hidden disabilities being denied boarding may cause confusion, anxiety and stress. Airlines must ensure that they have systems and processes in place to identify and prioritise any disabled person, including anyone with a hidden disability, on the relevant flight.

5.2 In the case of flight disruption, Article 9.3 of Regulation EC261/2004 states that airlines should pay particular attention to the needs of disabled passengers, those with reduced mobility and those accompanying them when providing care and assistance. As above, airlines must ensure that they have systems and processes in place to identify and prioritise any disabled person, including anyone with a hidden disability, on the relevant flight, airlines must ensure that they pro-actively provide assistance that meets the particular needs of the individual concerned. It may preferable for such passengers to return to familiar surroundings during the disruption (their home or, if they are away from home, the hotel they have been previously staying in). Airlines should take this into account when providing care and assistance to people with hidden disabilities.