

Travelling with Confidence:

A Pan-European Charter on Meeting the Needs of Disabled Air Travellers



easyJet special assistance advisory group

About ESAAG

ESAAG (easyJet special assistance advisory group) was established to primarily provide the airline with strategic guidance and practical advice on the evolving needs of passengers requiring special assistance. ESAAG reviews, discusses, challenges and seeks to improve internal policies and procedures across the customer journey. The group consists of well-respected external experts and senior internal representatives from easyJet.

This code is based on lessons learned from the work of the group and its members' practical insights while travelling across Europe. It has been developed over time to deliver a succinct set of best practices.

Introduction

Regulation (EC) 1107/2006 on the “rights of disabled persons and persons with reduced mobility when travelling by air” came into effect in July 2008. The purpose of the legislation is to ensure that disabled people (also defined as “people with reduced mobility”) are able to travel by air confident that they will receive the same level of service on any airline and at any airport throughout the European Union.

The specific aims of the Regulation are to:

- Give disabled people the same rights as other air passengers;
- Ensure that they are not treated differently in different EU Member States;
- Ensure that they are given a high level of consistent and reliable support from the point of booking throughout the journey;
- Ensure that they are not charged directly for the assistance they need;
- Provide a mechanism for complaints to be lodged when the provision of services and facilities falls short of acceptable standards.

While the Regulation has succeeded both in raising awareness of the needs of disabled air travellers and in raising standards of service, there is still significant inconsistency between the level and quality of service provided by airlines and at many airports.

The purpose of this Charter is to promote and encourage consistent and high quality provision of services and facilities for disabled passengers/PRMs both by airlines and by airports. The underlying principle is that services and facilities must be adapted to meet the needs of the PRM/disabled passenger, rather than expecting the passenger to compromise or adapt to fit with inadequate or inappropriate provision.

Legal Framework

Regulation 1107/2006 covers all airlines licensed by a Member State of the European Union and all airports within Member States. It also covers passengers departing from an airport outside the EU and travelling with an EU licensed airline to an airport in a Member State. The Regulation has also been applied outside the EU by Switzerland, Iceland and Norway.

Under the Regulation, responsibility for providing whatever assistance the PRM or disabled passenger needs rests with the airport. This applies on departure from the point of arrival at the airport until they are seated on the plane – and similarly at the point of arrival.

In many countries outside the EU, responsibility for this same service rests with the airline which will sub-contract the service to a ground handling agent.

During the flight (including decisions about the need for an accompanying person), the responsibility is with the airline.



Best Practice

In addition to the legal requirements set out in the Regulation there are also sources of advice and good practice.

In particular these are:

- ECAC, Doc 30, Part 1, Section 5 and Annexes which is cited in Regulation 1107/2006
http://ulc.gov.pl/_download/wiadomosci/07_2012/doc_30_0712.pdf
- ICAO Manual on Accessible Air Transportation
http://www.passepartouttraining.com/uploads/2013/03/ICAO-Manual-Doc-9984-1st-Edition-alltext-en_published_March-2013.pdf

It is very important to refer to these sources of guidance as well as the legal framework in order to understand not just what needs to be done but how it should be done.

National Enforcement Bodies

Clarifying who is responsible

One concern that affects all airlines covered by the scope of the Regulation is the almost universal perception among PRM passengers that the airline is responsible for the assistance they are given at the airport,

This is inevitable given that the passenger makes his/her reservation with the airline and the request for assistance is made through that process. The travel “contract” is also with the airline.

This means that airlines get many complaints from PRM passengers about poor or non-existent service at an airport. Although they are not responsible, there is residual reputational damage to the airline because in the passenger’s mind, they are at fault.

It would be helpful to have clearer identification at the airport of the services and facilities that they provide and who is responsible for them. Such information should be posted widely, including in places such as designated PRM waiting areas.

It would also be helpful if the National Enforcement Body for each Member State would ensure that PRMs are clear about who is responsible for which part of the journey and how to complain to the relevant body.

Ensuring continuity of monitoring and enforcement

There is clear evidence, both anecdotally and from research carried out for the European Commission that the approach taken by the National Enforcement Bodies across Europe varies widely.

Some are active in monitoring performance against the legal and best practice requirements by both airlines and airports under their jurisdiction. Others are entirely reactive (often because of very limited resources and knowledge) and have no information on the level or nature of problems occurring. As a result the key goal of the Regulation: to provide continuity of service quality to enable PRMs to travel with confidence, is not being met.

With the support of the European Commission, National Enforcement Bodies should work to ensure that they are all operating to the same standards and that evidence of complaints and problems is transparent.



Pre-Journey: Websites and Booking

Many PRMs and disabled people are infrequent or first time fliers – or may not have flown since acquiring a mobility problem. They may have no idea what help or advice is available or where to start to look for it. They will often not even be aware that any help is available and that it is important to let the airline know about their needs.

The first priority for airlines is to make sure that the information that PRMs and disabled people need is clearly visible on front page of their website and that there are triggers throughout the booking process to pick up anyone who needs assistance.

This is increasingly important now that many more bookings are made on line and that many airlines no longer have check-in desks at airports. These developments, while they have streamlined the travel experience for many, have removed some of the human links from the travel chain that can be important to infrequent or first time disabled travellers.

In addition, of course, it is essential that airline and airport websites meet accessibility standards for people using screen readers and other assistive technology and that any call centres providing advice to PRMs can be contacted free of charge (as required by Regulation 1107/2006).

It is important for airport websites to include clear information about the facilities and services they have available and, in particular, about the distances that may need to be travelled between arrival at the airport and the departure gates.

Information about distances can be very helpful in enabling the PRM passenger to judge whether they can manage without assistance or whether they will need help. For those travelling between a large and small airport it may be the case that assistance is needed at one end of the journey and not the other. Information should be given in a clear and standard format. For example, it is unhelpful to give a walking time to a departure gate without also specifying distance so that those with walking difficulty can make their own judgement.

Without this information people may book assistance they do not need – or arrive unaware that they will need help. Either eventuality causes delays and costs to the airline, places strain on airport resources and inconveniences the passenger. Some airports are now penalising airlines for all non-pre-notified departing PRM passengers.

The level of help that a PRM or disabled passenger needs is determined at the booking stage by the allocation of an IATA code (see Annex A). These codes provide essential information both to the airline and the airport's assistance providers about the level of help that the passenger needs and the type of equipment that needs to be available to provide that assistance. If the coding is wrongly allocated at the booking stage, there may be serious problems for all concerned (including the passenger) once they arrive at the airport. Incorrect coding is one of the biggest single causes of problems for PRM passengers.

It is essential that travel agents, call centre staff and all others responsible for the booking process are fully aware of and trained in the correct use of IATA codes. This should include a full understanding of the questions to ask the passenger to determine what level of assistance is needed before allocating a code, recognising that not all passengers' needs will fit neatly into one code so that additional information may also need to be included.

It is also important to give PRMs and disabled passengers information about accessible travel options to/from airports. This should be included on airport websites and should cover accessible public transport links and routes as well as information about parking and drop off/pick up arrangements for disabled drivers and passengers.

Airports should include on their websites information about accessible public transport links as well as details of accessible parking and drop off/pick up for disabled drivers and passengers.



At the airport

Regulation 1107/2006 places responsibility for providing assistance to PRMs and disabled passengers with the airport.

Most airports sub-contract this service to a third party. It is very important that the agreement for the provision of PRM assistance includes service level agreements and quality standards and that all staff are given appropriate in-depth training that is refreshed on a regular basis.

Guidance on appropriate standards can be found in ECAC, Doc 30, Part 1, Section 5, Annex 5D.

Call Points

The airport is required to identify (in consultation with disabled people) all the points of arrival at the airport at which a PRM passenger may need to get assistance. Call Points from which the passenger can notify their arrival and call for assistance should be available at all these points.

Call Points should be clearly and easily identifiable. A common system of labelling the Call Points across Europe would help passengers to find them quickly and easily.

Call points should be easily useable by people with a wide range of disabilities including wheelchair users, people with limited manual dexterity or reach and those with impaired vision or hearing and those with cognitive impairment.

Staff responding to calls from Call Points should be well trained in the needs of PRMs and disabled people and have available information on all aspects of the journey on which passengers may want guidance or reassurance.

Much will depend on the size and layout of the airport but the key points are likely to include the long and short term car parks and bus, rail and taxi drop off points. Where there is a station in the airport, Call Points should, where possible, be available on the station platform to enable arriving passengers to contact staff for help when they get off the train. Alternatively an agreement should be in place with the train operating company to ensure that assistance is provided from the train to the nearest Call Point or other assistance point such as Bag Drop.

It is very important that PRM passengers are alerted to look out for the Call Points and that the equipment is regularly maintained and kept in working order and that the phone line is staffed at all times the airport is operating.

Airport websites should include information on the location of call points to help arriving PRM passengers to find them quickly.

Assistance through the airport

Assistance should be available, in accordance with the Regulation, throughout the airport departure and arrival process. This means giving assistance through security and passport control procedures and throughout the waiting period. PRM passengers should not be left unattended (unless they specifically request it) for more than 30 minutes. Some airports (such as Gatwick) have introduced paging systems which enable passengers who are able to do so to go for a meal or to visit shops, for example, and to be paged when they need to return to a central point for assistance to the gate.

Wheelchair users and other PRMs should never be left in a separate or isolated location where they have no access to airport facilities or to staff. Flight information screens should be visible from waiting areas.

Assistance must be available to take someone to the toilet if requested. Assistance providers are not required to help with toileting.

Above all, assistance should be provided in a professional, courteous, discreet and caring way so that the disabled passenger is not made to feel awkward or embarrassed.

Airports should ensure that their contracted PRM Assistance Provider has adequate numbers of well trained staff available as well as all necessary equipment and facilities to provide a consistent, high quality, seamless service to the PRM passenger.



Boarding/Disembarking

The airport assistance providers are responsible for helping the PRM to board the aircraft. This can be by means of an air bridge or with equipment such as Ambulifts /High Loaders if the aircraft is at a remote stand. In either case a boarding chair that fits down the aisles of the aircraft will be used.

The responsibility of the assistance provider extends to helping the passenger into his/her seat and, if requested, stowing their hand baggage in the overhead locker.

On arrival the same process applies.

Airlines should make clear their policy on boarding/disembarking of passengers who need assistance. The practice of boarding PRMs and disabled passengers first and disembarking them last enables assistance to be provided with dignity and with maximum available space for lifting and facilitating transfer to/from the aircraft seat.

In the case of emergency evacuation of an aircraft, PRMs and disabled passengers cannot expect to be given priority over other passengers.

Non-EU Airports

For airlines flying between an airport within the EU and one beyond EU boundaries, it is very important to ensure that the quality of service available to arriving/departing PRM passengers is as close as possible to that provided inside the EU.

Airlines contract with ground handling agents at non-EU airports to provide the service on their behalf. It is important to include a service level agreement for the provision of assistance as part of the contractual arrangement with the airport.

Models of appropriate agreements and performance levels are set out in ECAC, DOC 30, Part 1, Section 5, Annex 5D.

On-Board

Seating

Seating on board is a very important issue. PRM passengers need to be located where they can sit comfortably. This will include the need for additional leg room for stiff or fused legs, for example. They may also want to be seated close to the on-board toilet (particularly if an on-board wheelchair is not available).

However, the seating position for an immobile passenger also needs to take account of other passengers seated in the same row who may need to get in and out. This means that passengers who need to be lifted are usually allocated window seats.

Passengers with any kind of mobility difficulty cannot be seated in the emergency exit row.

Where a PRM is travelling with an accompanying person, that person should always be given a seat next to them to provide whatever support or assistance they may need during the journey.

Safety Briefing

Passengers who are unable to access the on-board safety instructions independently (for example blind passengers) must be given one to one safety briefing by cabin crew.

This should include explaining how to reach the nearest emergency exit, how to locate and fit the lifejacket and oxygen mask.



Accompanying person

Regulation 1107/2006 requires that in order to fly unaccompanied a passenger must be able to meet safety requirements. In particular this means:

- fasten and unfasten the seat belt;
- take out and put on the lifejacket;
- put on an oxygen mask;
- leave their seat and get themselves to an emergency exit (this does not need to be by walking).

Airlines should generally accept the passenger's self-determination on this point.

The discussion about whether or not the passenger needs to be accompanied should always take place at the point of booking so that if necessary they can book a second seat at that time.

However, it is common for people to arrive at the airport either unaware that they might need an accompanying passenger or believing that they will be able to fly anyway.

Guidance from the European Commission in 2012 suggests that in these circumstances it is possible to ask another passenger to take on the role of accompanying person in the event of an emergency.

It is very important that the PRM passenger understands that if no-one volunteers on either the outward or return leg of their journey they may find themselves stranded and unable to fly.

In all cases, an accompanying person should be someone who is physically able to provide any necessary assistance.

Getting to the toilet

The Regulation requires airlines to provide assistance to enable a disabled passenger to get to the on-board toilet. The Regulation does not explicitly, however, require that on-board wheelchairs are provided, although the majority of airlines now do so.

Even where on-board chairs are available, there is considerable variation between airlines on the level of support they will give. Some, for example, train all cabin crew in lifting and handling techniques so they are able to assist a passenger from his/her seat onto the on-board chair. Others will provide assistance only in pushing the chair to and from the toilet door. This means that the passenger must be able to transfer independently from seat to chair.

No airline will provide assistance in the toilet.

It is vital that information on the level and type of assistance available is clearly communicated to the passenger at the time of booking so they can assess whether they will be able to manage to get to the toilet if they need to.

It would also be very helpful to disabled passengers to have information on the airline website about the dimensions on on-board wheelchairs including manoeuvring space, availability of grab handles etc. so that people can make informed decisions before they fly about whether they will be able to use an on-board toilet. Pictures or other illustrations on the website could also be helpful.

Assistance Dogs

Recognised assistance dogs must be accepted on flights. The Regulation does not define what is meant by a “recognised” assistance dog but a definition is included in ECAC, Doc 30, Section 1, Part 5. The definition covers guide dogs, hearing dogs and assistance dogs trained by an organisation that is accepted by and affiliated to the International Guide Dog Federation (IGDF) or trained by an organisation that meets the full membership criteria of Assistance Dogs International (ADI). The Regulation does not set a limit on the number of assistance dogs that can be accommodated on any given flight. Dogs must be able to remain with the PRM/disabled passenger at all times on the floor at their feet. There are still restrictions on the acceptance of assistance dogs to/from certain destinations, usually between a third country and an EU Member State.

The allocation of seating for a passengers travelling with an assistance dog will need to take account of this requirement together with any possible allergy issues among other passengers seated nearby (it may be necessary to re-seat passengers who do have allergy problems).

Training

Regulation 1107/2006 requires that all airport and airline staff dealing with the travelling public are given appropriate training.

The length and depth of training will depend on their role. For example, staff working in food or other retail outlets at the airport need basic training in disability awareness/equality while security staff need in-depth understanding of how to conduct searches and checks with sensitivity and dignity.

PRM assistance providers should be given very detailed training in all aspects of the assistance that is needed as well as in practical skills including lifting and handling. They should also be fully trained in safe handling of all equipment needed to assist PRMs and disabled passengers.

Cabin crew and pilots also need thorough training to understand their legal responsibilities and how to treat people with dignity and sensitivity.

Guidance on the training requirements for each area of responsibility are set out in ECAC, Doc 30, Part 1, Section 5, Annex 5G.



Summary of Recommendations

For National Enforcement Bodies

- The National Enforcement Body for each Member State should ensure that PRMs are clear about who is responsible for which part of the journey and how to complain to the relevant body;
- National Enforcement Bodies should ensure that they are all working to the same standards and that evidence of complaints and problems is transparent.

For airlines

- It is important to refer to guidance and best practice (from ECAC and ICAO) as well as the legal framework in order to understand not just what needs to be done but how it should be done;
- Cabin crew and pilots need thorough training both to understand their legal duties and to appreciate how to treat people with dignity and sensitivity,
- Where a PRM is travelling with an accompanying person, that person should always be given a seat next to them so they can provide whatever support or assistance they may need during the journey;
- An accompanying person must be someone who is physically able to provide any necessary assistance.
- Airlines should generally accept a passenger's self-determination of whether or not they need an accompanying person to travel with them;
- Airlines should ensure that if a PRM passenger is deemed to need an accompanying person at the point of departure, they fully understand that there can be no guarantee that a volunteer from among other passengers can be found for either or both legs of the journey. In this event the passenger may be unable to fly ;
- It is vital that, at the time of booking, PRMs are made aware of the type and level of assistance that will be available on board to help them get to/from the toilet so they can assess whether they will be able to manage;
- Great care needs to be taken in the way that booking processes are set up on line to make sure that the right triggers are in place so that new or infrequent PRMs/disabled passengers are helped both to identify what assistance they need and understand the practicalities of the journey;
- At non-EU airports where airlines contract with ground handling agents to provide PRM assistance on their behalf, a service level agreement should be included in the contractual arrangements to specify the quality of service to be provided. Models of appropriate agreements can be found in ECAC, Doc 30, Section 1, Part 5, Annex 5D;
- It is essential that travel agents, airline call centre staff and all others responsible for the booking process are fully aware of and trained in the correct use of IATA codes. This should include a full understanding of the questions to ask the passenger to determine what level of assistance is needed before allocating a code, recognising that not all passengers' needs will fit neatly into one code and that additional information may also need to be included.
- Airlines should make clear their policy on boarding/disembarking of passengers who need assistance. The practice of boarding PRMs and disabled passengers first and disembarking them last enables assistance to be provided with dignity and with maximum available space for lifting and facilitating transfer to/from the aircraft seat.
- It would be very helpful to disabled passengers to have information on the airline website about the dimensions on on-board wheelchairs including manoeuvring space, availability of grab handles etc. so that people can make informed decisions before they fly about whether they will be able to use an on-board toilet. Pictures or other illustrations on the website could also be helpful.



For airports

- It is important to refer to guidance and best practice (from ECAC and ICAO) as well as the legal framework in order to understand not just what needs to be done but how it should be done;
- The agreement for the provision of PRM assistance should include service level agreements and quality standards as well as requirements for appropriate in-depth training that is refreshed on a regular basis;
- Airports should ensure that their contracted PRM Assistance Provider has adequate numbers of well trained staff available as well as all necessary equipment and facilities to provide a consistent, high quality, seamless service to the PRM passenger.
- PRM assistance providers must be given very detailed training in all aspects of the assistance that is needed as well as in practical skills including lifting and handling. They should also be fully trained in safe handling of all equipment needed to assist PRMs and disabled passengers.
- Wheelchair users and other PRMs should never be left in a separate or isolated location where they have no access to airport facilities or to staff.
- Assistance should be provided in a professional, courteous, discreet and caring way so that the disabled passenger is not made to feel awkward or embarrassed.
- Call points at airports should be well signed, the equipment should be regularly maintained and the phone line should be staffed at all times that the airport is operating.
- Call Points should be clearly and easily identifiable and a common system of labelling the Call Points across Europe would be help passengers to find them quickly and easily.
- Call points should be easily useable by people with a wide range of disabilities including wheelchair users, people with limited manual dexterity or reach and those with impaired vision or hearing or with cognitive impairments.
- Staff responding to calls from Call Points should be well trained in the needs of PRMs and disabled people and have available information on all aspects of the journey on which passengers may want guidance or reassurance.
- Where there is a station in the airport, Call Points should, where possible, be available on the station platform to enable arriving passengers to contact staff for help when they get off the train. Alternatively an agreement should be in place with the train operating to ensure that assistance is provided from the train to the nearest Call Point or other assistance point such as Bag Drop.
- It would be helpful to have clearer identification at the airport of the services and facilities that they provide and who is responsible for them.
- Airport websites should include information on the location of call points to help arriving PRM passengers to find them quickly.
- Airport websites should include clear information about the facilities and services they have available and, in particular, about the distances that may need to be travelled between arrival at the airport and the departure gates.
- It is important to give PRMs and disabled passengers information about accessible travel options to/from airports. This should be included on airport websites and should cover accessible public transport links and routes as well as information about parking and drop off/pick up arrangements for disabled drivers and passengers.
- Airports should include on their websites information about accessible public transport links as well as details of accessible parking and drop off/pick up for disabled drivers and passengers.



Annex A

IATA Codes

WCHR: Passenger who can walk up and down stairs and move about in an aircraft cabin, but who requires a wheelchair or other means of support for movements between the aircraft and the terminal, in the terminal and between arrival and departure points on the city side of the terminal.

WCHS: Passenger who cannot walk up or down stairs, but who can move about in an aircraft cabin and requires a wheelchair to move between the aircraft and the terminal, in the terminal and between arrival and departure points on the city side of the terminal.

WCHC - This category covers a wide range of passengers. It includes those who are completely immobile, who can move about only with the help of a wheelchair or any other means and who require assistance at all times from arrival at the airport to seating in the aircraft or, if necessary, in a special seat adapted to their specific needs, the process being reversed at arrival. This category also includes passengers with a disability only affecting the lower limbs who require assistance to embark and disembark and to move inside the aircraft cabin but who are otherwise self-sufficient and can move about independently in their own wheelchair at the airport. Specifying the level of autonomy at the time of booking will avoid the provision of inappropriate assistance.

BLND: Blind or visually impaired passenger.

DEAF: Passenger who is deaf or hard of hearing or a passenger who is deaf without speech.

DEAF/BLND: Blind and deaf passenger, who can only move about only with the help of an accompanying person.

DPNA: Disabled passenger with intellectual or developmental disability needing assistance. This covers passengers with disabilities such as learning difficulties, dementia, Alzheimer's or Down's syndrome who travel alone and will need ground assistance.



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