

TRL



PUBLISHED PROJECT REPORT PPR132

ACCESS TO AIR TRAVEL FOR DISABLED PEOPLE: SUMMARY REPORT

Version: Final

by J Sentinella (TRL)

Prepared for: Project Record: PPAD 9/72/90 Benchmarking and Monitoring Air Travel for Disabled People

Client: Mobility and Inclusion Unit, Department for Transport

Copyright TRL Limited July 2006

This report has been prepared for Department for Transport, Mobility and Inclusion Unit). The views expressed are those of the author(s) and not necessarily those of Department for Transport.

Published Project Reports are written primarily for the Customer rather than for a general audience and are published with the Customer's approval.

Approvals	
Project Manager	<input type="text"/>
Quality Reviewed	<input type="text"/>

This report has been produced by TRL Limited, under/as part of a Contract placed by Department for Transport. Any views expressed are not necessarily those of Department for Transport.

TRL is committed to optimising energy efficiency, reducing waste and promoting recycling and re-use. In support of these environmental goals, this report has been printed on recycled paper, comprising 100% post-consumer waste, manufactured using a TCF (totally chlorine free) process.

CONTENTS

Summary of Findings	1
Acknowledgements	8
References	8

Summary of Findings

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. 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 already 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 summarises the findings of a study commissioned by the Department for Transport to assess the effectiveness of the Code of Practice. The full report (Sentinella, 2006) describes the research in detail. 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 staff disability awareness training. This had often involved the introduction of a new training package, 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 of the way 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. DPTAC¹ 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.

¹ DPTAC = Disabled Persons Transport Advisory Committee

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.

Acknowledgements

TRL would like to thank staff at Research International and JMU Access Partnership for their valuable contributions to the project. For facilitating access to the industry and recruiting participants to the study, TRL would like to thank the project's steering group members:

Alicia Hamilton (BAA, AOA)

Keith Richards (ABTA, DPTAC Aviation group)

Simon Buck (First Choice Airlines, BATA)

Jim Forster (BA)

Sue Sharp (DfT)

Richard Creese (DfT)

Finally, the author would like to thank all the organisations and participants who took part in the surveys and reviews of airlines and airports.

References

British Standards Institute (2001) 'Design of buildings and their approaches to meet the needs of disabled people – Code of Practice', **BS8300: 2001**. London: BSI.

Commission of the European Communities (2005) **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) 47 final. 16.2.2005. Brussels, EC.

Committee on Transport and Tourism, European Parliament (2005) **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 – 2005/0007(COD))**. A6-0317/2005 Final. 27.10.2005. Brussels: EC.

Department of the Environment, Transport and the Regions (DETR) and the Welsh Office (1999) **Approved document Part M – Access and facilities for disabled people (1999 edition)**. London: The Stationary Office.

Department for Transport (2002) **Inclusive Mobility – A Guide to best practice on access to pedestrian and transport infrastructure**. London: Department for Transport.

Department for Transport (2003) **Access to Air Travel for Disabled People - Code of Practice**. London: Department for Transport.

Disabled Persons Transport Advisory Committee (2003) **Access to air travel: Guidance for disabled and less mobile passengers**. London: DPTAC.

Disabled Persons Transport Advisory Committee (2003) **Consultation on accessibility specification for toilets on aircraft**. London: DPTAC.

European Civil Aviation Conference (2003) **ECAC policy statement in the field of civil aviation facilitation**, ECAC Document No. 30 (Part 1). 9th Edition. Available at <http://www.ecac-ceac.org/>

House of Commons (1995) **The Disability Discrimination Act 1995**. London: The Stationery Office.

House of Lords and House of Commons (2004) **Joint Committee on the Draft Disability Discrimination Bill - First Report**. London: The Stationery Office.

Office of the Deputy Prime Minister (2004) **Approved document Part M – Access to and use of buildings (2004 edition)**. London: The Stationery Office.

Sentinella J. (2006) **Access to Air Travel for Disabled People: 2005 Monitoring study**. PPR 139. Wokingham: Transport Research Laboratory.

U.S. Federal Government: Code of Federal Regulations (2006) **Nondiscrimination on the Basis of Disability in Air Travel**. Available at http://www.access.gpo.gov/nara/cfr/waisidx_06/14cfr382_06.html

W3C (1999) **Web Content Accessibility Guidelines**. Available at <http://www.w3.org/TR/WAI-WEBCONTENT/>.