

Passenger Advisory Group
Fifth meeting - 27 June 2019

Commission for Aviation Regulation



Agenda

10:00 -10:05	Welcome – Action Points
10:05 -10:30	Passenger Experience Surveys and Issues for Discussion
10:30 -11:20	Regulation 1107/2006 / Work Plan of Air Passenger Rights
11:20 -11:30	Coffee Break
11:30 -12:10	Work of Dublin Airport and OCS
12:10 - 12:20	Lunch Break
12:20 - 1:00	Response to other Action Points

Action Points

The Commission will inform the Group about:

1. Survey results about Passenger Experience
2. Issues related to Passengers with disabilities and reduced mobility
3. SLA and performance of wait times for assistance of passengers with disabilities or reduced mobility
4. Monitoring satisfaction of passengers with disabilities or reduced mobility who choose to travel without assistance
5. Representativeness of the Customer Survey Monitor of Dublin Airport
6. How long arriving bags remain in the belt in the baggage reclaim hall

Passenger Experience at Dublin Airport - Survey Results

1. The Alzheimer's Society of Ireland
2. The Irish Society for Autism
3. National Council for the Blind Ireland

High-level summary of results:

1. Assistance is useful and staff are helpful
2. Staff training is key
3. Passengers do not always inform of their condition or needs
4. Passengers encounter some difficulties

The Alzheimer's Society shared the results of research in the UK about air travel and dementia

Survey Results – Alzheimer’s Ireland

5 out of 6 do not inform airline of their condition in advance.

- “I ask for general assistance, dementia does not fit criteria.”
- “No need to.”

4 out of 6 ask for assistance and 3 find it helpful.

Why is it helpful?

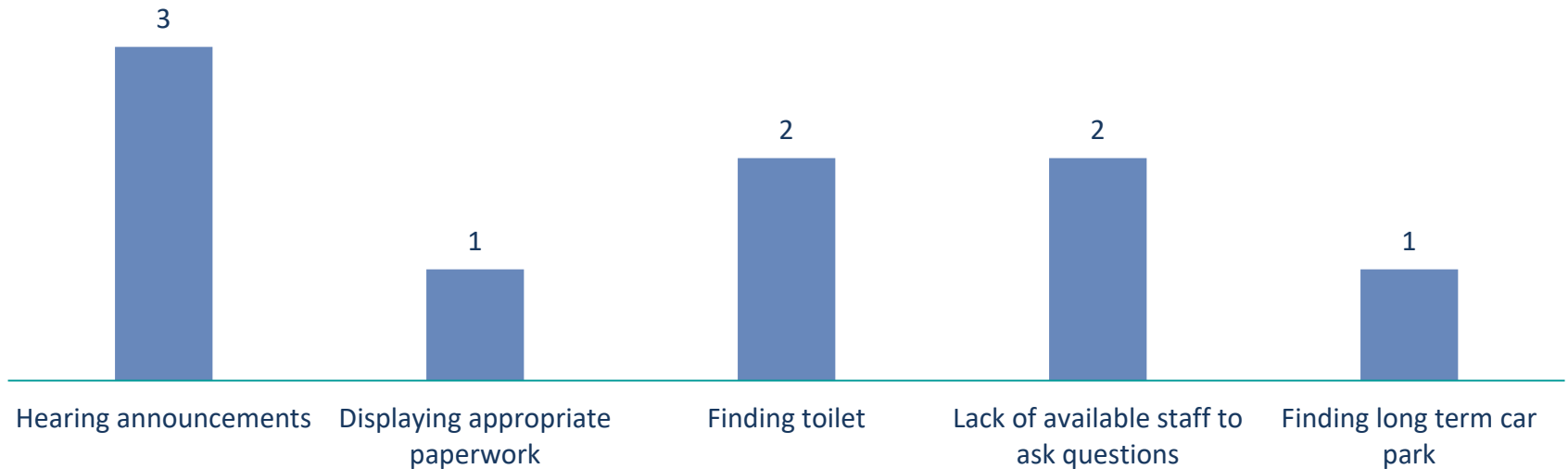
- It expedites check-in, security, boarding plane, disembarking, and getting luggage.

Why it is not helpful?

- Use of a wheelchair completely misunderstand dementia needs.
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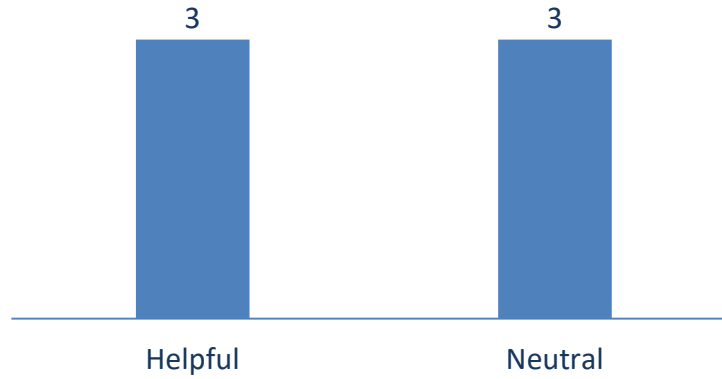
Survey Results – Alzheimer’s Ireland

4 out of 6 encounter difficulties at the airport

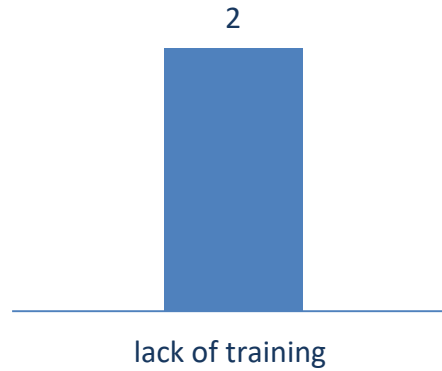


Survey Results – Alzheimer’s Ireland

3 out of 6 found staff helpful

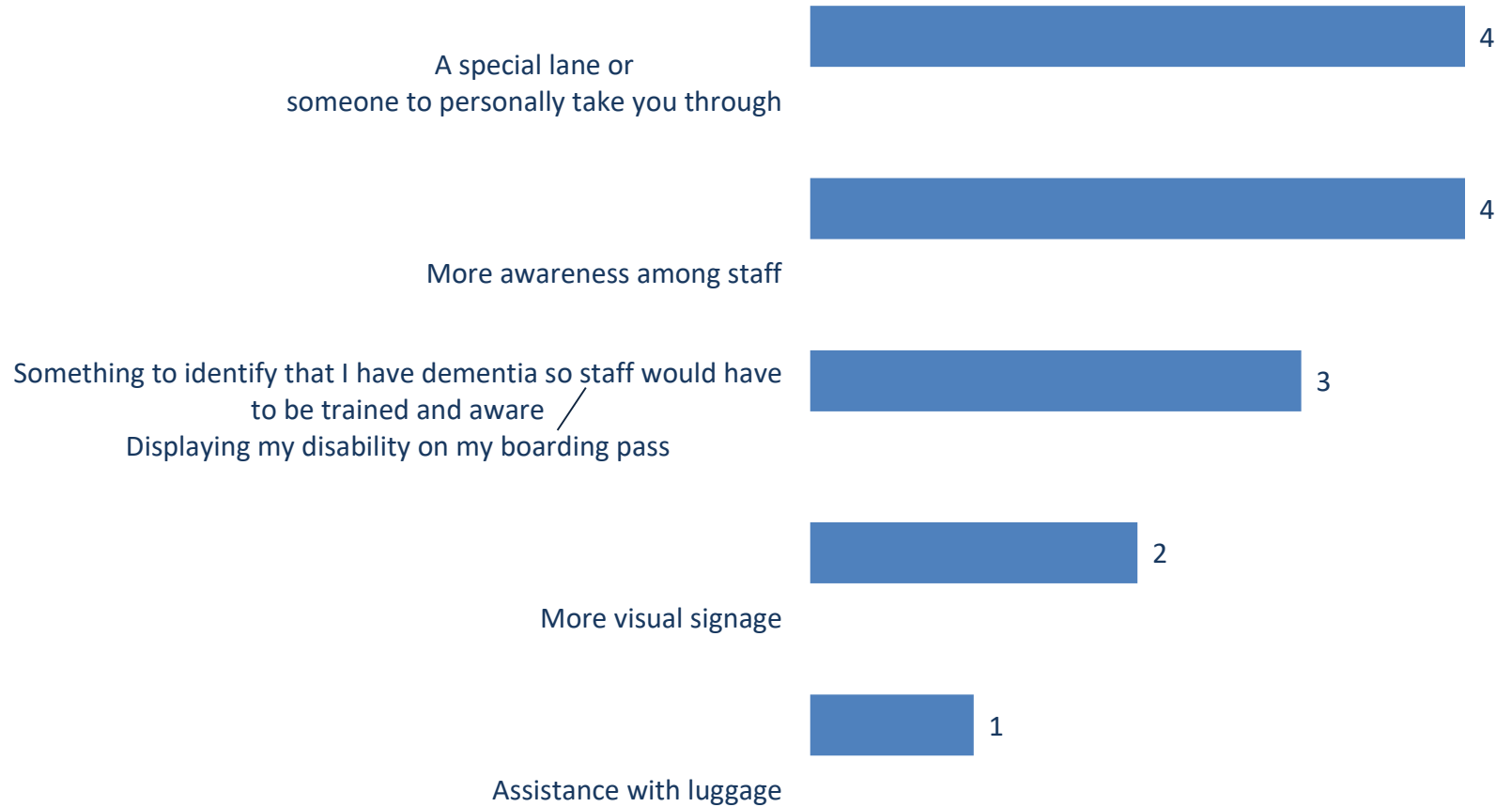


Why neutral?



Survey Results – Alzheimer’s Ireland

What might help you feel better?



Survey Results – Irish Society for Autism

- **Airport Experience**

- Staff were very supportive, friendly and willing to help.
- Parents recognise that they are ultimately responsible for their child but OCS assistance and other facilities in the airport make their journey easier.

- **Suggestion**

A standard autism awareness training programme could be provided to relevant staff.

Staff are helpful but have different levels of knowledge regarding Autism.

NCBI Survey Results

- People use the OCS services and the experience is very positive overall.
- If people travel without assistance, they bring a sighted family member or friend.

There are some concerns:

- If a person who is blind or vision impaired does not use OCS services, they would not be able to use the self-service check-ins or the see the screens at baggage claim.
 - People who have requested sighted guide assistance have sometimes been requested to sit in a wheelchair.
 - Staff should be aware that a vision impairment may not always be obvious. People with impaired vision do not always use a long cane or guide dog.
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UK Research on Air Travel and Dementia

- **Knowing that assistance is available**
 - At some airports, people can visit beforehand to make assistance arrangements.
- **The language**
 - Why is it called “special” assistance?
 - Industry jargon (“PRM”) should not be used in public spaces.
- **Security**
 - People with dementia have anxiety of being separated from their belongings.
 - Passengers with dementia may feel unstable having to remove shoes while standing. A seat before security check would be useful.
- **Noise pollution**
- **Environment and Surfaces**
 - Shiny, reflective floor surfaces in terminals are challenging for some people with dementia.

Issues raised by the Group

- Staff training and awareness
 - Availability of staff to assist passengers with disabilities
 - Accessibility of self-service processes
 - Accessibility of signage and information, audio announcements
 - Accessibility considerations in the procurement process
 - Contingency plan to assist passengers with disabilities or reduced mobility in case of disruption or emergency
 - Embarking of passengers with disabilities or reduced mobility
 - Wheelchair damage
 - Public awareness about passenger rights
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Regulation No 1107/2006
rights of disabled persons
and persons with reduced mobility
when travelling by air

 flightrights.ie

Regulation 1107

- Sets out minimum levels of assistance that must be given to air passengers who have pre-notified their assistance requirements.
 - Intention is to give disabled persons and persons with reduced mobility the same right as all other citizens to free movement, freedom of choice and non-discrimination, when travelling by air.
 - Areas covered include:
 - Assistance travelling through the airport;
 - Assistance embarking and disembarking aircraft;
 - Assistance with check in and luggage; and
 - Provision of information in appropriate formats.
 - The regulation places responsibility for provision of the majority of this assistance with airport authorities and they can provide it directly or they can nominate a third-party service provider, e.g. OCS.
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Where does the Regulation apply?

- The Regulation applies at all airports within the European Union (EU).
 - The Regulation applies on all flights within, and out of, the EU and it applies to flights from third countries (like the United States) to the EU where these are operated by Community-licensed carriers.
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How can passengers obtain assistance?

- Passengers who require assistance are entitled to receive it provided it has been requested in advance and can be provided safely.
 - Passengers should notify the air carrier (directly or via tour operator/travel agent) at least 48 hours in advance of the departure.
 - The air carrier is required to notify the airports.
 - Different categories of assistance can be requested and this can be done by communicating directly with either the airline or the airport management company. Can vary depending on the airline or airport.
 - Passengers may be obliged to be accompanied by another person who is capable of providing assistance to them.
 - All European air carriers have a contact number or an email address dedicated to taking requests available on their websites.
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IMPORTANT

- Airport and air carrier assistance is only guaranteed when requested at least 48 hours before the scheduled departure time.
 - If the assistance is requested less than 48 hours before scheduled departure time, reasonable efforts are to be made to assist but help is not guaranteed.
 - Airlines are not obliged to assist passengers who do not pre-notify and may deny boarding or refuse carriage of equipment.
 - Passengers must be on time – at designated access point at least 2 hours before departure or at a check in desk at least one hour before flight (or before time stipulated in booking).
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At the Airport

- All airports within the EU have designated points of arrival/departure.
 - These designated points are clearly signposted and unmanned arrival points are equipped with intercoms.
 - Passengers who have notified their arrival at one of these points are collected and assisted to check-in, brought through security, to the boarding gate and then onto the aircraft.
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On-board the aircraft: Assistive Devices

- Carriage of mobility equipment or assistive devices (such as oxygen concentrators) is subject to safety regulations and airplane and air carrier restrictions.
 - Passengers should check with the airline before booking to ensure that the required equipment can be transported.
 - It is important to remember that different air carriers have different rules and requirements – it will be necessary to do some research!
 - If mobility equipment is lost or damaged in transit the airport is required to provide a temporary replacement, but not on a like-for-like basis.
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Assistance Dogs in the cabin

- Regulation 1107 states that recognised assistance dogs are entitled to travel in the cabin but it is necessary to make sure that the air carrier is licensed to carry animals and that the airports it is intended to travel from/to can also accommodate them.
 - It may be helpful to contact the Dept. of Agriculture (Pet Passport Section).
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Airplane Seating

- In compliance with other safety legislation many air carriers have designated seating for passengers with reduced mobility so it may not be possible to choose a preferred seat.
 - Seating policies can vary from one airline to the next so, again, research is advised.
 - Generally these policies are in place to ensure the safety of all passengers in the event of emergency evacuation as well as ensuring that assistance, during the flight as well as embarking and disembarking, is close at hand and can easily reach passengers who require it.
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Training

- Air carriers and airport managing bodies are required to:
 - a) Ensure that all personnel providing direct assistance have knowledge of how to meet the needs of persons having various difficulties 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; and
 - c) Ensure that this training forms part of induction training and regular refresher training courses are provided.
 - It is important to note the limitation above in point a). The Regulation does not envisage a situation where all staff members might be required to provide direct PRM assistance. Tasks that are specific to the needs of PRM and those with special assistance needs are only to be carried out by certain designated and specially trained staff.
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Making a complaint about an infringement of 1107

- Complaints should first be made to the managing body of the airport or to the airline, but can also be made to the Commission.
 - Complaints should be submitted as soon after the incident as possible. This makes it easier to investigate, reduces the likelihood that staff involved are no longer available and, most importantly, prevents further incidents by ensuring that any failings are identified and rectified quickly.
 - Complaints should be detailed so that those investigating can get a clear picture of what happened and what they need to investigate. Full facts are necessary. At a minimum it should include
 - Where did the incident occur?
 - Flight number, date, time.
 - Name(s) or description(s) of staff providing assistance.
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In summary....

- Passengers are entitled to assistance both at the airport and on-board the aircraft.
 - Assistance is guaranteed if requested at least 48 hours in advance.
 - Specific requirements can often be met, provided they are communicated with sufficient notice.
 - Passengers are strongly advised to do some research to be sure that the air carrier can accommodate their particular requirements.
 - These rights are in addition to the rights afforded to all air passengers under EC261/2004.
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The Role of the Commission for Aviation Regulation

- We are the designated national enforcement body for EC 1107/2006. This means that we:
 - Carry out inspections of all airports in the Republic of Ireland in respect of matters covered in the Regulation;
 - Investigate complaints from passengers regarding infringements of the Regulation; and
 - Take whatever measures are necessary to ensure that the rights of disabled persons are respected, including issuing directions to airlines and airports where infringement has been noted as a result of our inspection or investigation of passenger complaints.
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Inspections

- The Air Passenger Rights team carries out inspections of airports in respect of Regulations 1107/2006 and 261/2004.
 - We inspect all commercial airports in the Republic of Ireland at least once every 12 months.
 - These inspections also provide an opportunity for airports to discuss innovations they are introducing or considering and any difficulties they may be encountering.
 - One point raised frequently is how to cater for individual needs without negatively impacting on other passengers. For example low signage can be an issue for taller people, loud announcements can impact on those with sensory issue. In all things the airports and air carriers must try to find a happy balance.
 - Following the inspection we issue a report to the airport authority in which we highlight any issues that were identified that need to be addressed.
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Inspections

- As part of this process we:
 - Meet with airport management and, if the service is provided under contract, with the duty manager of the service provider.
 - Request details of when training was last conducted, and who provides the training.
 - Obtain information regarding passenger numbers, service users (pre-advised and ad hoc) and KPIs/SLAs.
 - Obtain information regarding staffing levels, equipment, innovations and complaints handled by the airport authority.
 - Carry out a visual inspection of signage at the airports main arrival points.
 - Carry out a test of communication equipment at unmanned designated points of arrival.
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Complaints and Enforcement

- Complaints can be submitted using our online complaint form, however we are happy to assist individuals who may have difficulty using the online system.
 - We currently receive very few complaints in relation to the services provided under EC1107/2006 - only 7 complaints have been received in 2019 - and the majority of the complaints we receive relate to the services provided by the airline.
 - Enforcement action can be taken against airlines or airports to ensure that any failure to comply with the provisions of the Regulation is corrected.
 - We can only take enforcement action if we have evidence. Detailed complaints from individual passengers outlining their personal experience on a particular day are the best way to gather this evidence.
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Air Passenger Rights Workplan

- Include service users in our PRM inspections for 2019 (volunteers welcome). We also intend to increase frequency of inspections, particularly at Dublin Airport.
 - Encourage adoption of the Green Sunflower lanyard (currently in use in Cork airport and several major UK airports) to enable those with hidden disabilities to identify themselves and make it easier for airport and airline staff to recognise people (not using the assistance provided) who may need to be treated a little more sensitively, or may need a little more time.
 - Investigation of complaints
 - Review website for www.flightright.ie
 - Work with airports, airlines and service users to improve services and increase public awareness about the services that are available.
 - Coordinating various passenger representative groups
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Regulation (EC) No 261/2004
establishes common rules on compensation and assistance
to passengers in the event of flight cancellations, long flight
delays and instances of denied boarding.

Air Passenger Rights in Brief - Cancellations

- Where a flight is cancelled passengers are entitled to choose between:
 - re-routing (either as soon as possible or at a later date at their convenience); or
 - a refund of the cost of their flight ticket.
 - If they choose re-routing as soon as possible, the air carrier must provide care and assistance whilst awaiting the alternative flight.
 - Passengers are also entitled to compensation unless the air carrier can prove that the cancellation was caused by extraordinary circumstances which could not have been avoided even if all reasonable measures were taken.
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Air Passenger Rights in Brief - Delays

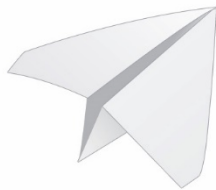
- Where a flight is delayed by certain prescribed time frames, then the air carrier must provide you with care and assistance.
 - If your flight is delayed for more than 5 hours and decide not to travel, you are entitled to receive a refund of the cost of your ticket.
 - Compensation may be payable if the flight arrives more than three hours after scheduled time of arrival unless the air carrier can prove that the delay was the result of extraordinary circumstances which could not have been avoided even if all reasonable measures were taken.
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Commission for Aviation Regulation

www.aviationreg.ie

3rd Floor Alexandra House, Earlsfort Terrace, Dublin 2

Tel: 00353 (0)1 6611700



flightrights.ie

Responses to points raised by the Passenger Advisory Group

- 1. The survey comments** – Passengers should pre-notify and ensure that they clearly communicate their specific assistance needs, in writing preferably. Individuals who have had an unsatisfactory experience with pre-notified assistance are encouraged to make a detailed complaint as above. This ensures that any failings can be identified and rectified. If passengers have not pre-notified or choose not to avail of the provided assistance EC1007 doesn't apply.
 - 2. Training and awareness** – At inspections the CAR ensures that all staff are trained and that refresher training is carried out, however, some individual staff members may either require additional training or be unsuited to the role. Again, failings should be brought to the attention of the airport managing body and the CAR so that suitable steps can be taken.
 - 3. Availability of staff** – Wayfinding, flight information and courtesy and helpfulness of airport staff are all quality of service metrics. Passengers who have booked assistance should be provided with adequate assistance for their full airport experience, including in the event of disruptions, and if this service fails complain.
 - 4. Potential for tailored assistance** – Airport management companies try to provide appropriate assistance for each individual and most Irish airports have launched their own initiatives to provide tailored assistance to passengers with sensory issues and hidden disabilities for example. You have to ask and communicate your specific needs, again, pre-notify.
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Responses to points raised by the Passenger Advisory Group (contd.)

5. **Monitoring of provision of information** – it is the responsibility of the airport to ensure that passengers who require assistance and pre-notify are assisted from arrival at the airport through every stage of the process. Airport and airline website content is not covered by the Regulation however, quality issues should be raised with the airport and airlines directly.
 6. **Accessible signage** - We ensure that signage at arrival points is clear. From that point onwards pre-notified passengers are to be provided with all the assistance that is set out in Annex 1 and Annex 2 of the Regulation, which includes navigation of the airport, and should complain if the service is unsatisfactory. For all other passengers the satisfaction with signage and flight screens can be covered by the Commission’s quality of service standards.
 7. **Audio announcements** – the Regulation provides for full service assistance from the designated points of arrival. Care is required to balance the needs of those with visual impairments with the needs of other passengers, say, with sensory issues.
 8. **Self-service processes should be accessible** – Pre-notified passengers using the service provided by the airport do not need to access these processes themselves. For all other passengers the satisfaction with self-service processes is dealt with in the Commission’s price determination process – including quality of service standards.
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Responses to points raised by the Passenger Advisory Group (contd.)

9. **Accessibility considerations in the procurement process at Dublin Airport** - Similar to the accessibility of self-service processes, the regulation makes it the responsibility of the airport to ensure that pre-notified passengers are assisted to make their way from the designated point of arrival to their seat on the aircraft. If passengers who fall within the scope of the Regulation have not received the entirety of this service then they should make a formal complaint.
 10. **Embarking of PRM** – while this is not covered by the Regulation, airlines say they have a strong preference for PRM to be embarked first.
 11. **Wheelchair damage** – Claims for loss or damage are made in accordance with international, Community and National law between passenger and airport or air carrier. The Commission has no role in such claims.
 12. **Public Awareness about Passenger Rights** – We welcome suggestions on how this is to be done. Passenger rights groups were involved in the drafting of Regulation 1107 of 2006. We have used a dedicated passenger rights website www.flihrights.ie for many years. The European Commission has a “Your Europe” section on its website which provides information aimed at EU Citizens in all EU languages, as well a brochures and posters which can be downloaded or ordered.
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Striving to make air travel more accessible

June 2019

Liz Kavanagh
Passenger Experience Manager

PRM Information



**312,342 PRM
Passengers
in 2018**

**8% increase on
2017**

**PRMs account for
1% of our overall
passengers**

Dublin Airport Ethos

Access for All



Our facilities



Tactile Paving



**Accessible Drop Off /
Pick Up Zones**



Our facilities



Reception Points



**Reduced Height
FIDS**



Help Points

Our facilities



Induction Loops



Pictorial Signage

Our facilities



**Assistance Lanes
at Security**



**Assistance Dog
Relief Rooms**

Our facilities



Accessible and Changing Places Toilets

Autism

- » Visual Guides
- » Familiarisation Tours
- » 'Important Flyer' Initiative
- » My Canine Companion Training Facilitation



IATA Categories of Assistance

- » **MEDA:** Passenger whose mobility is impaired, due to clinical cases with medical pathology in progress, being authorized to travel by medical authorities. Such passenger usually has social coverage in relation to the illness or accident in question.
- » **STCR:** Passenger who can only be transported on a stretcher. Such passenger may or may not have social protection or specific insurance.
- » **WCHR:** Passenger who can walk up and down stairs and move about in an aircraft cabin, but who requires a wheelchair or other means 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.
- » **WCHP:** Passenger with a disability of the lower limbs who has sufficient personal autonomy to take care of him/herself, but who requires assistance to embark or disembark and who can move about in an aircraft cabin only with the help of an on-board wheelchair.
- » **WCHC:** Passenger who is completely immobile, who can move about only with the help of a wheelchair or any other means and who requires assistance at all times from arrival at the airport to seating in the aircraft or, if necessary, in a special seat fitted to his/her specific needs, the process being inverted at arrival.
- » **BLIND:** Blind
- » **DEAF:** Passenger who is deaf or a passenger who is deaf without speech.
- » **DEAF/BLIND:** Blind and deaf passenger who can move about only with the help of an accompanying person.
- » **MAAS:** Meet and assist - all other passengers in need of special help.
- » **DPNA:** Passenger with intellectual or developmental disability needing assistance.

Equipment

- » Wheelchairs
- » S-Max Chairs
- » Aisle Chairs
- » Ambi-lifts
- » Mini buses
- » E-Mobby
- » Passenger buggies



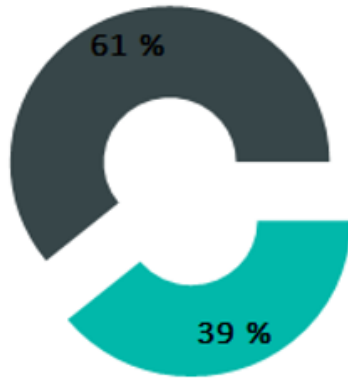
Training

- » **OCS Staff receive the following training:**
 - Disability Confidence
 - Client Handling
 - Client Handling – Lifting Equipment
 - Customer Care
 - Manual Handling
 - Operational Proficiencies

- » **Dublin Airport staff receive Disability Awareness Training**

Pre-notification statistics YTD

■ Non Preadvised ■ Preadvised



Date	Outbound			Inbound			Total
	Non Preadvised	Preadvised	Total	Non Preadvised	Preadvised	Total	
January	4203	5061	9264	3203	6333	9536	18800
February	3677	4243	7920	2848	5163	8011	15931
March	4781	5264	10045	3716	7115	10831	20876
April	6192	7394	13586	4494	9540	14034	27620
May	8043	9598	17641	5785	12643	18428	36069
June	6126	7607	13733	4637	9967	14604	28337
Total	33022	39167	72189	24683	50761	75444	147633

	Outbound			Inbound			TOTAL
	Pre-Advised	Non Pre-Advised	Total	Pre-Advised	Non Pre-Advised	Total	
Totals	39168	33022	72190	50761	24683	75444	147634
Precent	54%	46%		67%	33%		
	Pre-Advised	61%		Pre-Advised Total	89929		
	Non Pre-Advised	39%		Non Pre-Advised Total	57705		

Thank You – Q&A

Action Points from 30 May Meeting

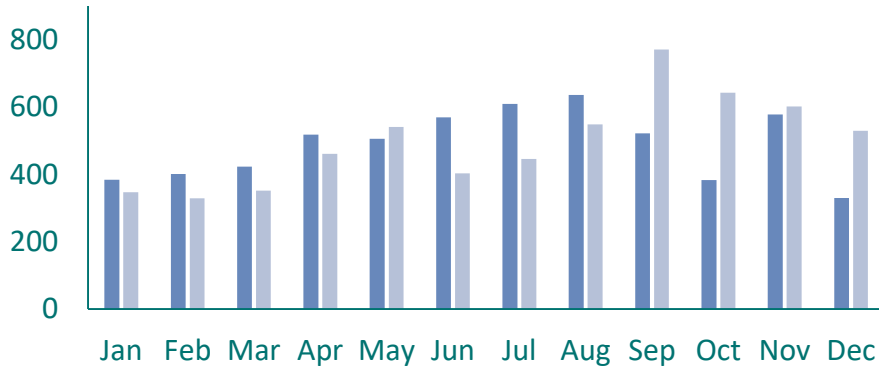
Action Point 3. how to monitor the satisfaction of passengers with disabilities or reduced mobility who choose to travel without assistance.

- We proposed to monitor the satisfaction of all departing and arriving passengers.
- There could be a possibility to ask survey passengers to disclose whether they have a disability in order to monitor their satisfaction. However, the disadvantage is a small sample of responses, in particular if passengers choose not to disclose their disability.

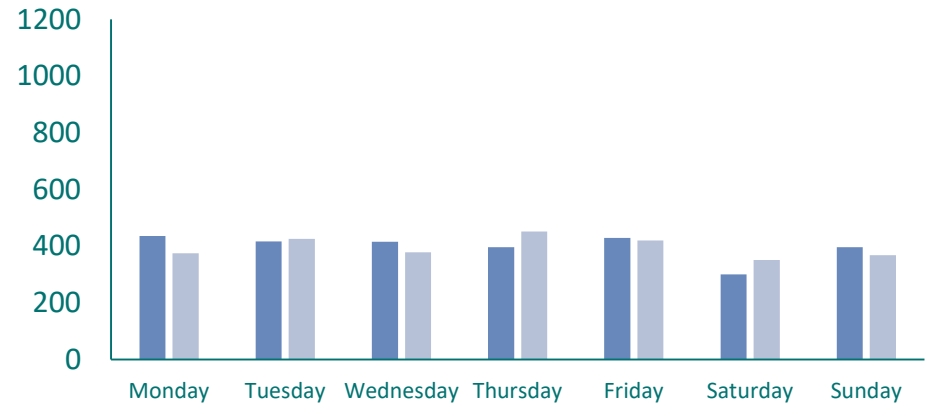
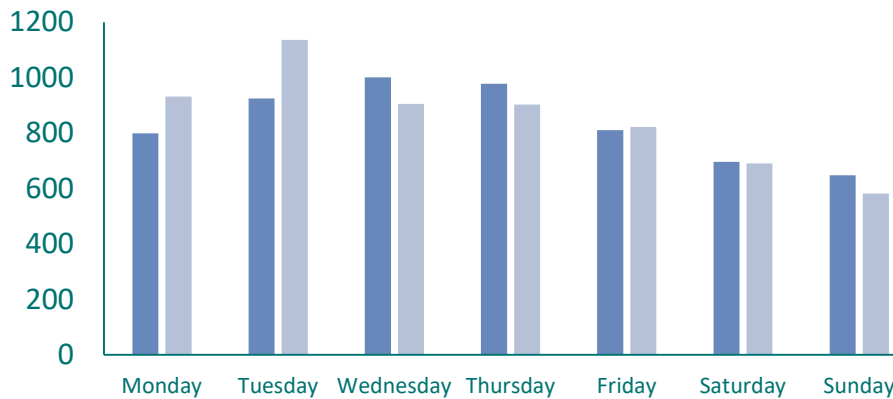
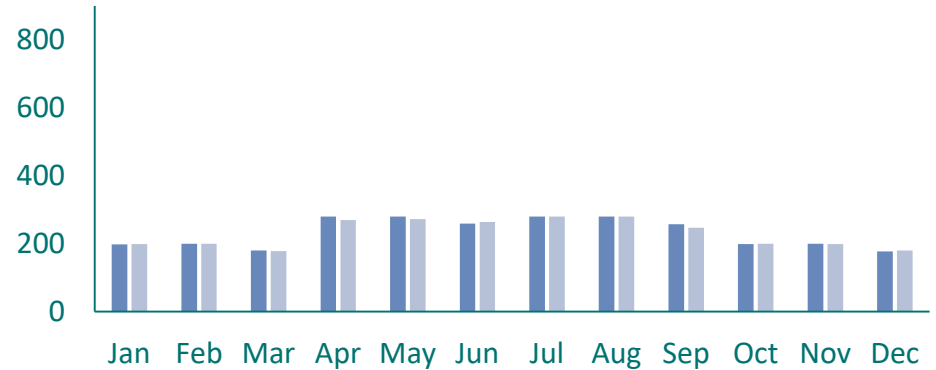
Action Points from 30 May Meeting

Action Point 4. Customer Monitor Survey of Dublin Airport

Departures



Arrivals

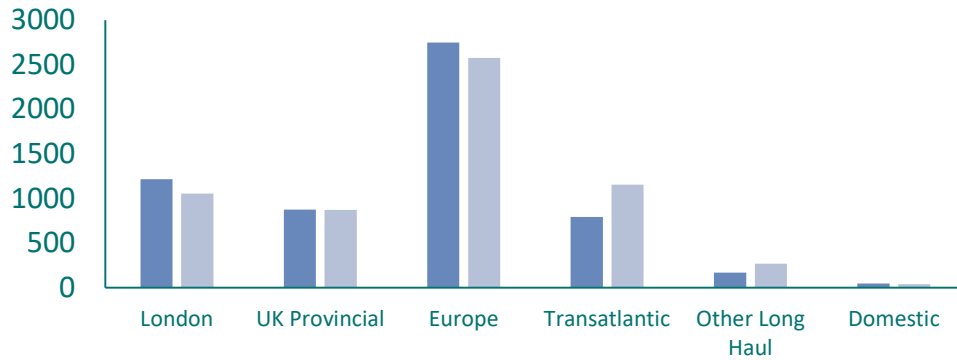


■ 2017 ■ 2018

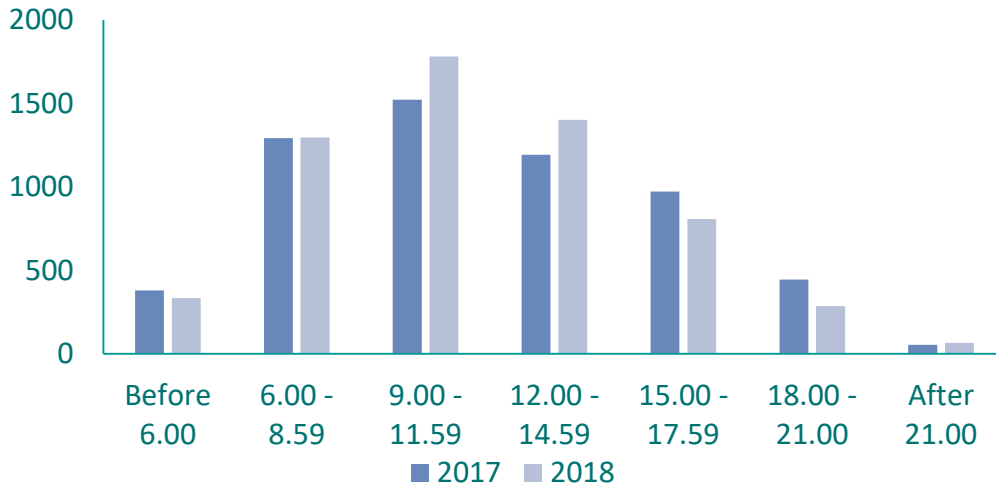
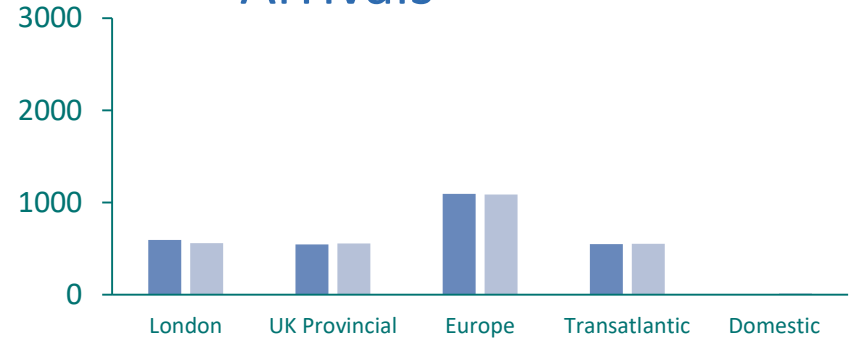
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Action Point 4. Customer Monitor Survey of Dublin Airport

Departures



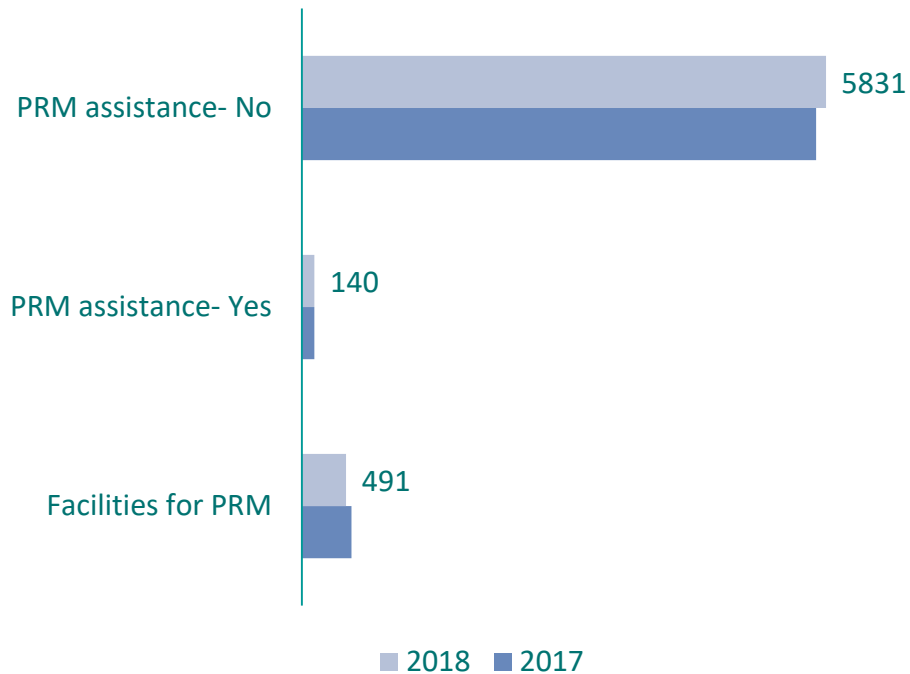
Arrivals



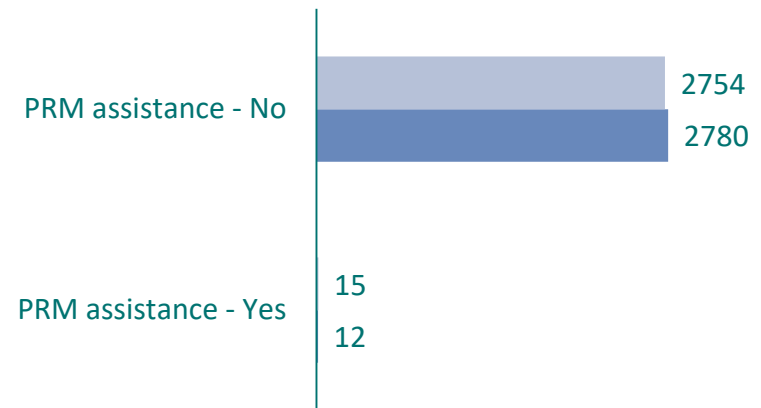
Action Points from 30 May Meeting

Action Point 4. Customer Monitor Survey of Dublin Airport

Departures



Arrivals



Action Points from 30 May Meeting

Action Point 5. For how long arriving bags remain in the belt in the baggage reclaim hall?

Each groundhandler/airline may have different protocols about how long they leave the bags in the belts.

The baggage hall managers of Dublin Airport would remove bags only in exceptional circumstances where:

- there was a congestion issue in the baggage hall or
- where baggage was remaining on the belt for more than 24 hours.