



# Airport Accessibility Compliance Report 2023

IRELAND WEST AIRPORT





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## 1. Executive Summary

The IAA is the single civil aviation regulator for Ireland. We are responsible for the regulation of safety, security and consumer interests. The Irish Aviation Authority (IAA) is the National Enforcement Body in Ireland for *Regulation (EC) No. 1107/2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air* (hereafter referred to as ‘the Regulation’). The IAA investigates complaints and conducts inspections of airports situated in Ireland in order to ensure compliance with the Regulation. The purpose of the Regulation is to enable persons with reduced mobility (PRM) and persons with disabilities to have equal opportunities for air travel comparable to those of persons without reduced mobility or a disability. In line with the IAA’s responsibilities as the National Enforcement Body for the Regulation, the IAA conducted an inspection of Ireland West Airport to ensure compliance with the obligations set out therein.

The information gathered pre-inspection relates to statistics on Persons with Reduced Mobility (PRMs),<sup>1</sup> as well as training information and the type and quantity of mobility equipment. As the data in Figure 1 indicates, Ireland West Airport had a total of 12,602 PRMs in 2023. Accordingly, PRMs represent 1.55% of the total passenger numbers. Ireland West Airport was also recognised as a member of the [Hidden Disabilities Sunflower](#) in September of 2023.<sup>2</sup> The airport satisfied all obligations under the Regulation, while needing further minor edits to the airport’s Quality Standards and Website. This will be covered in the IAA’s findings. In general, the airport is a PRM friendly airport, and all customer service staff are trained to provide PRM assistance should it be necessary.

Airport	Total Passenger	Total PRM	PRM % of Total Pax
Dublin	33,262,941	391,719	1.18%
Cork	2,798,024	26,619	0.95%
Shannon	1,897,599	22,045	1.16%
Ireland West	813,266	12,602	1.55%
Kerry	414,571	3,322	0.80%
Donegal	19,230	382	1.99%

Figure 1 Table of Passenger and PRM Numbers for All Irish Airports for Calendar Year 2023.<sup>3</sup>

<sup>1</sup> This report will use the acronym ‘PRM’ to refer to both persons with reduced mobility and persons with disabilities in line with industry practises.

<sup>2</sup> See further information on the airport’s website [here](#).

<sup>3</sup> Passenger numbers refer to commercial passengers only. The passenger numbers are all available from the Central Statistics Office. Donegal Airport passenger number is from the airport, not the CSO. Further information can be downloaded from the CSO here:

[https://ws.cso.ie/public/api.restful/PxStat.Data.Cube\\_API.ReadDataset/TAM08/XLSX/2007/en](https://ws.cso.ie/public/api.restful/PxStat.Data.Cube_API.ReadDataset/TAM08/XLSX/2007/en). The PRM numbers are provided by the airports.

## 2. Overview

### 2.1. Definition of Person with Reduced Mobility and Disabled Person

The definition of ‘disabled person’ or ‘person with reduced mobility’ is taken directly from (EC) 1107/2006 Article 2(a):

*“...any person whose mobility when using 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, and whose situation needs appropriate attention and the adaptation to his or her particular needs of the service made available to all passengers.”<sup>4</sup>*

It is important to note that there is no distinction between short-term/long-term or, as used in the above definition, “permanent/temporary” for the purposes of having reduced mobility or a disability. There has also been an international movement to recognise those with hidden disabilities and how these passengers can experience barriers to air travel. Persons with disabilities (hidden or otherwise) or with reduced mobility can request the assistance set out in the Regulation without having to disclose their disability or reason for reduced mobility.

### 2.2. Purpose of the Report

The purpose of this report is to provide a comprehensive overview of the accessibility of Ireland West Airport within the scope of IAA’s enforcement remit of Regulation (EC) 1107/2006. The report addresses Ireland West Airport’s compliance with the obligations prespecified in the Regulation and determines, from the physical inspection, complaints submitted to the IAA, and the pre-inspection questionnaire whether the airport has met its obligations. The reports’ sections will briefly summarise the relevant Article and the airport’s compliance, as well as the IAA’s commentary from the inspection. The IAA has issued recommendations with timeframes for the implementation of any necessary changes to comply with the Regulation. The report will also highlight positive innovations undertaken by the airport and upgrades since the previous inspection. Finally, the report will provide Summary Findings and General Comments.

### 2.3. Airport Inspection

The airport inspection follows the format provided for in Annex I of (EC) 1107/2006. Annex I outlines the “assistance under the responsibility of the managing bodies of airports.”, the inspection starts at the outside boundary where it is expected a passenger would enter the airport, i.e. from the car park or from the ‘drop off zone’ at the front doors. The inspection encompasses the PRM experience, up to the point of embarking on the aircraft.

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<sup>4</sup> Regulation (EC) 1107/2006 Article 2.

## 2.4. Inspection Methodology

### 2.4.1. Notice of Inspection

The IAA will issue a Notice of Inspection to the airport which will include a proposal for times and dates for the inspection. The Notice of Inspection also briefly outlines the role of the IAA as the National Enforcement Body charged with ensuring compliance with Regulation (EC) 1107/2006.

### 2.4.2. Preliminary Questionnaire

The Notice of Inspection also includes a preliminary questionnaire in advance of the inspection. The airports have 20 business days to submit a response to the questionnaire.

### 2.4.3. Post Inspection and Report Publication

After the physical inspection has been conducted, the IAA creates a report outlining the IAA's findings and airport's compliance with the Regulation. The IAA liaises with the airport regarding the deadlines for implementation of the recommendations made. These timeframes are outlined in the published report.

## 3. Inspection Findings (2023)

On the 14<sup>th</sup> of November 2023, the Irish Aviation Authority conducted an inspection of Ireland West Airport to assess the airport's compliance with Regulation (EC) 1107/2006. The following sections analyse the airport's compliance with each article of the Regulation. Each section will outline the article, the obligations deriving from the Regulation and the IAA's findings.

### 3.1. Article 5: Designation of Points of Arrival and Departure

*“The managing body of an airport shall, taking account of local conditions, designate points of arrival and departure within the airport boundary or at a point under the direct control of the managing body, both inside and outside terminal buildings, at which disabled persons or persons with reduced mobility can, with ease, announce their arrival at the airport and request assistance.”<sup>5</sup>*

The points of arrival and departure shall (as per the Regulation) be clearly signed and shall offer “basic information about the airport, in accessible formats.” The ability for a PRM to announce their arrival upon entering the airport boundary is an important and sometimes critical beginning to their air travel. Announcing one's arrival and receiving timely assistance ensures the passenger has a stress-free journey and is not delayed for their flight. Accordingly, this article addresses two significant aspects of the airport's compliance: call points and signage.

There is one designated point of arrival which is located in close proximity to the disability parking spaces in 'Car Park 1'. The area where the call point is located has a shelter and a seat should the passenger require it. While the volume on the call point was low on the day of the inspection, the call was answered by a customer service agent. The airport confirmed that it would check the call point to ensure it was working properly and would also increase the volume.

While in its earliest stages, the airport is considering upgrades to the area in conjunction with a wider airport development plan. Ireland West Airport confirmed that PRM accessibility would be at

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<sup>5</sup> Regulation (EC) 1107/2006 Article 5(1).

the forefront of any updates to this area. Additionally, the departure and arrival doors of the airport are in very close proximity to the disabled parking spaces, with a mobility ramp leading to the airport's entrance. The mobility ramp was clearly signposted, as were the accessible parking spaces which were painted with the international symbol of access.

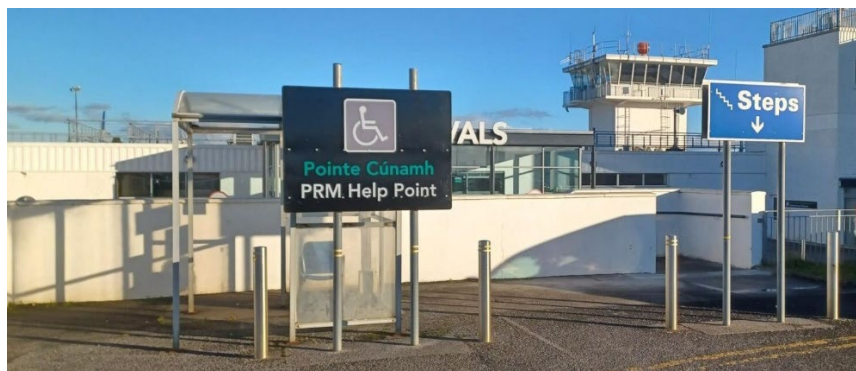


Figure 2: External PRM call point with covered seat area



Figure 3: External PRM call point, alternative angle showing the seat

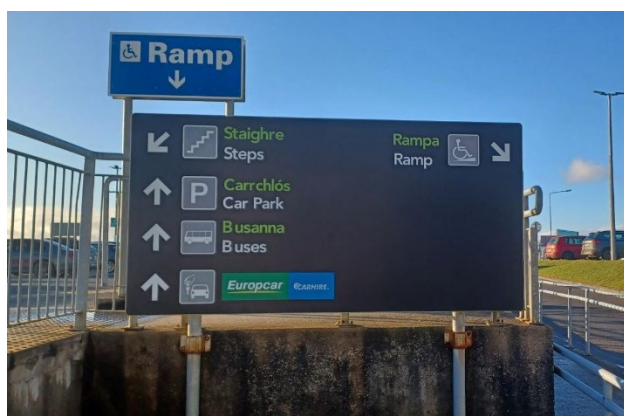


Figure 4: Sign indicating where the ramp is for PRMs or wheelchair users

The terminal entrances for the airport were clearly signposted and the zebra crossing had tactile pavement at either side. It was noted by the IAA that there was a lack of tactile pavement at the door to the terminal which was taken on board by the airport.

### 3.2. Article 6: Transmission of Information

*“When an air carrier or its agents or a tour operator receives a notification of the need for assistance at least 48 hours before the published departure time for the flight, it shall transmit the information concerned at least 36 hours before the published departure time for the flight [to the managing bodies of the airports of departure, arrival and transit.]”<sup>6</sup>*

This article also states that *“as soon as possible after the departure of the flight, an operating air carrier shall inform the managing body of the airport of destination, if situated in the territory of a Member State to which the Treaty applies, of the number of disabled persons and persons with reduced mobility on that flight requiring assistance specified in Annex I and of the nature of that assistance.”<sup>7</sup>*

Ireland West Airport receives the majority of its assistance notifications from the airlines and the notification is then submitted through the SITA system. While there are no specific obligations for the airport in Article 6, it is worth noting the timeframes for notifications for assistance. Passengers are required to pre-notify the airline of their assistance needs at least 48 hours in advance of their departure. Indeed, passengers are encouraged to submit their request at the booking stage. However, this request does not need to be forwarded to the airport until 36-hours prior to departure. This can unfortunately cause issues for the managing airport with regards to ensuring adequate staff are scheduled to provide assistance to passengers. From the IAA’s engagement with airports, alternative methods are generally used to ensure sufficient staff are scheduled to assist passengers. This can include using historic passenger numbers to indicate monthly trends and training additional customer service staff to provide assistance should more staff be required to meet passenger demands.

The airport confirmed that it is most often the airline who provides the notification to the airport of the required assistance. While the short notice of pre-advised assistance can cause resourcing issues, Ireland West Airport has remedied this with implementing specific measures. These measures are further discussed in 3.4 Article 8: Responsibility for Assistance.

### 3.3. Article 7: Right to Assistance at the Airport

*“When a disabled person or person with reduced mobility arrives at an airport for travel by air, the managing body of the airport shall be responsible for ensuring the provision of the assistance specified in Annex I in such a way that the person is able to take the flight for which he or she holds a reservation, provided that the notification of the person’s particular needs for such assistance has been made to the air carrier or its agent or the tour operator concerned at least 48 hours before the published time of departure of the flight.”<sup>8</sup>*

Ireland West Airport advised the IAA that it does not refuse any passenger that requires assistance. If pre-notification has not been provided, the passenger is informed that there might be a slight delay,

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<sup>6</sup> Regulation (EC) 1107/2006 Article 6(2).

<sup>7</sup> Regulation (EC) 1107/2006 Article 6(4).

<sup>8</sup> Regulation (EC) 1107/2006 Article 7(1).



but assistance will be provided in any event. As customer service agents are all trained to provide assistance to the ramp (area through terminal doors - airside), the airport confirmed that there is almost always a staff member available to provide the assistance.

Additionally, there are always four ground handling team members on duty to provide the assistance from the ramp to the aircraft and to the cabin seat if required. This type of assistance is known by the SSR (Special Service Request) code "WCHC".

The targets mentioned in the [Ireland West Quality Standards](#) are those set out in the [ECAC Code of Good Conduct in Ground Handling for Persons with Reduced Mobility 2003](#). It is the airport's responsibility to ensure these targets are met and that passengers can take their flights using the PRM assistance provided.

The ECAC Code of Good Conduct in Ground Handling for Persons with Reduced Mobility 2003 standards are as follows:

*FOR PRE-BOOKED DEPARTING CUSTOMERS*

Upon arrival at the airport, once they have made themselves known:

- 80% of customers should wait no longer than 10 minutes for assistance
- 90% should wait for no longer than 20 minutes
- 100% should wait for no longer than 30 minutes

*FOR NON PRE-BOOKED DEPARTING CUSTOMERS*

Upon arrival at the airport, once they have made themselves known:

- 80% of customers should wait no longer than 25 minutes
- 90% should wait no longer than 35 minutes
- 100% should wait no longer than 45 minutes

### 3.4. Article 8: Responsibility for Assistance

*"The managing body of an airport shall be responsible for ensuring the provision of the assistance specified in Annex I without additional charge to disabled persons and persons with reduced mobility."*<sup>9</sup>

This obligation lies with the airport managing body, but a contract can be established with one or more parties for the supply of the assistance.

Article 8(3) states that:

*"...the managing body of an airport may, on a non-discriminatory basis, levy a specific charge on airport users for the purpose of funding this assistance."*<sup>10</sup>

Ireland West Airport provides special assistance as per Regulation EC 1107/2006 for persons with reduced mobility and the airlines are charged a levy in line with the Regulation. The airport has

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<sup>9</sup> Regulation (EC) 1107/2006 Article 8(1).

<sup>10</sup> Regulation (EC) 1107/2006 Article 8(3).

trained 32 customer service agents to provide assistance up until the boarding gates. Article 8(3) states that the managing body of an airport may, on a non-discriminatory basis, levy a specific charge on airport users for the purpose of funding this assistance.

### 3.5. Article 9: Quality Standards

*“The managing body shall set Quality Standards for the assistance specified in Annex I, unless the airport’s annual traffic is less than 150 000 commercial passenger movements.”<sup>11</sup>*

The airport has developed Quality Standards with the most recent version being from 2021. The airport confirmed that their Quality Standards are reviewed every three years by airport management. After reviewing their Quality Standards (which are publicly available on the airport’s website) the IAA can confirm that the standards were written in line with the Regulation (EC) 1107/2006. There is a small error in the Quality Standards, where ‘wheelchair assistance to seat’ is labelled as WCHS instead of WCHC (passengers who can move around in a wheelchair or other similar means and who need assistance at all times from the moment they come to the airport until they are seated on the plane). It is recommended that the airport reviews the standards to ensure all information is accurate.

While the airport does not engage with passenger advisory groups regarding the Quality Standards, the airport advised that it utilised its own in-house experience in the area of accessibility and developed the document based on industry standards.

#### 3.5.1. Article 9 Findings:

##### *Quality Standards*

The Irish Aviation Authority recommends the airport review its Quality Standards to ensure all data is up to date and that there are no errors, and all information is correct. The current version published online is dated November 2015. The airport should ensure that this is the most updated version.

*Since the date of the inspection, the IAA can confirm that Ireland West Airport have implemented this recommendation.*

### 3.6. Article 11 Training:

*“Air carriers and airport managing bodies shall:*

*(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;*

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<sup>11</sup> Regulation (EC) 1107/2006 Article 9.

*(c) ensure that, upon recruitment, all new employees attend disability-related training and that personnel receive refresher training courses when appropriate”<sup>12</sup>*

The airport confirms that it has provided disability awareness training to all customer service personnel. In response to resourcing requirements for providing special assistance, all customer service agents are also trained to ‘push and pull’ the wheelchairs – i.e., up until the point of manual handling. The airport advised the IAA that eight members of the ground handling team are trained in manual handling. These staff members provide assistance to PRMs on the ramp and for those requiring WCHC assistance (full assistance to the cabin seat on the aircraft). Training for manual handling is provided on induction and on a ‘when needed’ basis. As the ground handlers regularly provide this assistance, training is only provided when there is an update in procedure. The Ground Services Manager has eight employees who are trained in manual handling. Shifts are scheduled to ensure that there are always staff who have this training available should this type of assistance be required by a passenger.

Additionally, in September 2023, Ireland West Airport official recognised the Hidden Disabilities Sunflower identifier for those with hidden disabilities. The airport advised the IAA that this will involve training in the coming months for hidden disability awareness.

### 3.7. Article 12: Compensation for Lost or Damaged Wheelchairs, Other Mobility Equipment and Assistance Devices

*“Where wheelchairs or other mobility equipment or assistive devices are lost or damaged whilst being handled at the airport transported on board aircraft, the passenger to whom the equipment belongs shall be compensated, in accordance with rules of international, Community and national law.”<sup>13</sup>*

Ireland West Airport confirmed that it will fulfil this obligation if required.

### 3.8. Article 15: Complaint Procedure

*“A disabled person or person with reduced mobility who considers that this Regulation has been infringed may bring the matter to the attention of the managing body of the airport or to the attention of the air carrier concerned, as the case may be.*

*If the disabled person or person with reduced mobility cannot obtain satisfaction in such way, complaints may be made to any body or bodies designated under Article 14(1), or to any other competent body designated by a Member State, about an alleged infringement of this Regulation.”<sup>14</sup>*

Passengers should have the ability to make a complaint regarding the assistance received directly to the airport management body. Complaints ensure that the airport or airline is proactively ensuring compliance with the standards laid down by the Regulation. The complaint mechanism should be easily accessible to passengers: by having information readily available in the airport or on the airport’s website. Each complaint should be investigated and replied to by the party concerned.

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<sup>12</sup> Regulation (EC) 1107/2006 Article 11(a-c).

<sup>13</sup> Regulation (EC) 1107/2006 Article 12.

<sup>14</sup> Regulation (EC) 1107/2006 Article 15(1) and 15(2) respectively.

Ireland West Airport confirmed that it receives complaints via email. The complaint is logged and then flagged for the correct department. Each complaint is investigated and replied to by Ireland West Airport. The IAA confirms that, since the date of the inspection, it does not have any ongoing or submitted complaints relating to Ireland West Airport.

### 3.8.1. Findings:

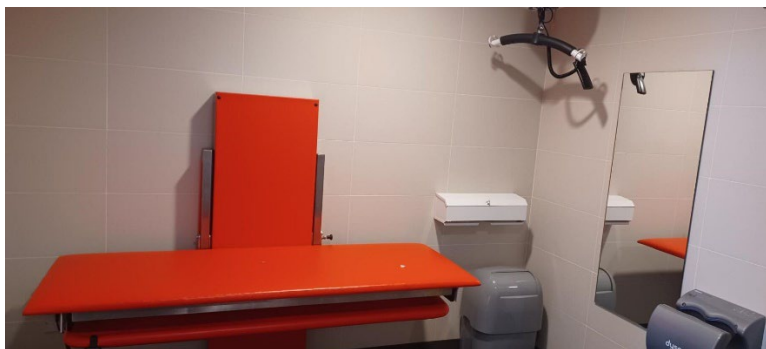
#### *Website Information*

While the airport provides information at the airport, having an up-to-date website available to passengers in advance of travel can answer many questions before arrival. The link leading to information on Regulation (EC) 1107/2006 currently directs users to the Irish Aviation Authority website. The airport is encouraged to review its webpages for accessibility and to ensure information is up to date and accurate. The airport is also advised to include information regarding submitting complaints regarding the assistance received on the website.

*The IAA confirms that, since the inspection, Ireland West Airport have completed this recommendation.*

## 4. General Comments

Ireland West Airport continues to be an accessible airport for people with reduced mobility and disabilities. There has been innovation by the airport with regards to implementation of changes received from passengers. An example of this was the addition of a hoist in one of the accessible bathrooms in the arrivals area to enable passengers to use changing facilities if needed.



*Figure 5: Hoist and changing facilities*

Signage for the accessible parking was clearly labelled, as were the individual car spaces. Additionally, signage throughout the airport was almost uniform in the internationally recognisable 'blue/white' symbol of access.



*Figure 6: Disabled Parking Sign with the International Symbol of Access in Blue and White*

One issue highlighted by the 2022 Inspection Report on Regulation EC 1107/2006 was the lack of a tracking mechanism for passengers with their designated assistance agent. The report indicated that this could cause issue if a disruption occurred, and vulnerable passengers might be missed by the assistance team. On discussion of this point with the airport, it confirmed that this has not been an issue. A record is taken of the passenger upon arrival, whether the passenger is pre-notified or not. The airport explained that PRMs are usually easily monitored on the airside as there are only three gates with designated accessible seating in the middle of the gate area. The airport directs all PRMs to this designated area after passing through security. The airport also asserted that, as there are a small number of flights operating out of the airport, there is rarely a shift change during the course of the workday. However, if this were to occur, the procedure would be that an agent would inform the duty manager of the PRMs on the disrupted flight and which passengers would need to be handed over due to the shift change.

At the time of the inspection, the Ireland West Airport website did not have the correct link on the 'Special Assistance' page which should lead to a copy of the Regulation. The link leads to the Irish Aviation Website homepage. While most information regarding assistance is provided directly by the airport to passengers upon arrival, additional information or resources on the airport's website is always welcomed addition. This is to ensure passengers can stay informed about their rights.

As discussed during the inspection, the airport is requested to inform the IAA of the upcoming training that is going to be provided by the Hidden Disability Sunflower organisation and to provide further information on same.

Ireland West Airport provides assistance directly to the passengers with reduced mobility or persons with disabilities. Each obligation of the Regulation has been met satisfactorily and the airport has made changes based on the IAA's findings. Contingency plans are in place should issues arise with staff shortages or possible flight disruptions. The amenities provided by the airport are also accessible for passengers with reduced mobility or passengers with disabilities.

## 5. Summary Findings

The airport provides the assistance under Regulation (EC) 1107/2006 itself as per Article 8 of the Regulation. All necessary customer service staff are trained to provide this assistance and ground handlers are also trained to provide additional assistance for WCHC (assistance from Gate/ramp to cabin seat on aircraft) passengers. Based on the information gathered during and prior to the

inspection, the Irish Aviation Authority asserts that Ireland West Airport has satisfied Article 6, Article 7 and Article 8 of the Regulation. The airport has satisfied Article 9 of the Regulation as it has published the airport's Quality Standards on their website. As discussed in Section 3.8.1 Findings:, some website information requires updating.

The airport has also satisfied their obligations under Article 11, Article 12, and Article 15. All training procedures discussed during the inspection meet the obligations laid down by the Regulation. The airport has a complaints procedure should a person with reduced mobility or a person with a disability wish to complain about the assistance service. As per Article 12, the airport advised the IAA of its procedure for compensating for lost or damaged mobility equipment. Accordingly, the airport has satisfied Article 11, Article 12, and Article 15 of the Regulation.

Ireland West Airport provides assistance directly to the passengers with reduced mobility or persons with disabilities. Each obligation of the Regulation has been met satisfactorily. Contingency plans are in place should issues arise with staff shortages or possible flight disruptions. The amenities provided by the airport are also accessible for passengers with reduced mobility or passengers with disabilities.

## 6. Appendix:

### 6.1. Outstanding Issues from 2022 Inspection

The Ireland West Airport 2022 inspection highlighted that, “Ireland West is an extremely well laid out airport with clear consideration for passengers who require assistance when travelling.”

#### *PRM Reporting System*

One recommendation that was outlined in the 2022 report was for Ireland West Airport to create a reporting or transfer system for when flight disruptions occur. When a passenger arrives at the airport seeking assistance, they are assigned an agent to provide the assistance from that point until the passenger has to board the aircraft. However, due to the size of the airport and its annual traffic, special assistance does not have tracking technology in place to indicate where staff are or who they are helping. As was stated in the 2022 report, this could present an issue if a disruption occurs and there is a shift change with staff. As there is no record of which passengers had which staff member providing assistance, it is possible that some passengers could be missed if there is a disruption. While this point was brought up during our last inspection, it is prudent to state that the Irish Aviation Authority has not received any complaints in relation to this issue.

