



Airport Accessibility Compliance Report 2023

DONEGAL AIRPORT







Table of Contents

1. Executive Summary.....	4
2. Overview	5
2.1. Definition of Person with Reduced Mobility and Person with Disabilities.....	5
2.2. Purpose of the Report	5
2.3. Airport Inspection.....	5
2.4. Inspection Methodology	6
2.4.1. Notice of Inspection.....	6
2.4.2. Preliminary Questionnaire.....	6
2.4.3. Post Inspection and Report Publication.....	6
3. Inspection Findings (2023).....	7
3.1. Article 5: Designation of Points of Arrival and Departure	7
3.1.1. Article 5 Findings:	9
3.2. Article 6: Transmission of Information.....	10
3.3. Article 7: Right to Assistance at the Airport	11
3.4. Article 8: Responsibility for Assistance.....	11
3.5. Article 9: Quality Standards.....	12
3.6. Article 11 Training.....	12
3.7. Article 12: Compensation for Lost or Damaged Wheelchairs, Other Mobility Equipment and Assistance Devices	13
3.8. Article 15: Complaint Procedure	13
4. General Comments	13
5. Summary Findings.....	14



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 Donegal Airport to ensure compliance with the obligations set out therein.

The information gathered pre-inspection relates to statistics on Persons with Reduced Mobility (PRMs),¹ as well as training information and the type and quantity of mobility equipment. Figure 1 indicates that PRMs account for 1.99% of the total passengers departing from the Donegal Airport. Due to the annual airport traffic being under 150,000 passengers, the airport is not obliged to create and/or publish Quality Standards. Donegal Airport only count outbound passengers toward both its total passenger numbers and its total PRM numbers (pre-notified and no pre-notified). The PRM figure is collected by the airport management body from the airline systems and requests for assistance made through the PRM Assist Application. Donegal Airport has implemented all aspects of the Regulation; however, improvement is needed in clarifying their signage for accessible bathrooms. Additionally, the airport should monitor the car park to assess need for more accessible parking spaces.

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: All Passenger and PRM numbers from all Irish Airports 2023²

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

² 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. The PRM numbers are provided by the airports themselves.



2. Overview

2.1. Definition of Person with Reduced Mobility and Person with Disabilities

The definition of ‘disabled person’ or ‘person with reduced mobility’ is stated in Regulation (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.”³

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 Donegal Airport within the scope of IAA’s enforcement remit of Regulation (EC) 1107/2006. The report addresses Donegal 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 General Comments and Summary Findings regarding the airport’s compliance under the Regulation.

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.

³ 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 5 December 2023, the IAA conducted an inspection of Donegal 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.”⁴

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. Accordingly, this article addresses two significant aspects of the airport’s compliance: call points and signage.

Upon entering the car park at Donegal Airport, a PRM passenger can use the call button located on the car barrier at the entrance to request assistance from the car park into the airport building. While there is no designated external PRM call point, the airport is only serviced by one bus service. Accordingly, the majority of PRM passengers arrive at the airport by car. There are also three accessible car parking spaces available in close proximity to the entrance of the car park and a short distance to the doors of the airport building. The parking spaces are brightly coloured with a yellow border and the International Symbol of Access in blue and white.

The airport confirmed that if a passenger calls for assistance using the gate’s call point, a member of the airport staff will meet them at their car and provide the assistance as required.



Figure 2: International Symbol of Access in white on blue background with yellow indicating accessible parking space

⁴ Regulation (EC) 1107/2006 Article 5.



Figure 3: Accessible Parking Spots in yellow, blue and white with the International Symbol of Access



Figure 4: Assistance Call Button at Barrier to Car Park

Article 5(2) continues: *“The points of arrival and departure referred to in paragraph 1, shall be clearly signed and shall offer basic information about the airport, in accessible formats.”*⁵ Accordingly, it is imperative that an airport has clear signage for PRM-related facilities but also general wayfinding.

Signage throughout the airport is clear. The airport also benefits from having an open plan concourse where staff are present at the information desk to handle queries from PRM passengers.

⁵ Regulation (EC) 1107/2006 Article 5.



Figure 5: Accessible bathroom indicated by the International Symbol of Access in the Departures Area

The signage for the accessible toilet is visible in the main concourse and in the departures area. The bathroom in the main concourse (before security) and the bathroom at the gates are both accessible.



Figure 6: Accessible bathroom indicated by International Symbol of Access in the main concourse

After proceeding from the ramp (area outside the ‘Gate’ where passengers embark on aircraft) and entering the arrivals hall, our inspection recorded two signs indicating the location of an accessible bathroom. However, the airport confirmed that the bathroom to which these signs direct the passenger is not an accessible bathroom. The IAA advised the airport at the time of the inspection that this sign would need to be changed as soon as possible.



accessible bathroom

Figure 7: Signage when entering airport building indicating location of

3.1.1. Article 5 Findings:

Signage Indicating Accessible Parking Spaces

While the parking spaces are located in close proximity to the entrance of the car park, there is no signage indicating the accessible parking zone. The IAA also advised the airport that if there were any

developments planned for the parking area as a whole, the accessible parking spaces should be prioritised in ensuring accessibility.

As there is accessible parking at Donegal Airport, the airport is only advised to monitor the current usage of the spaces. Should there be an increased need for spaces, this should be addressed by the airport.

“Toilets” Signage in Baggage Hall

Signage in the arrivals hall in the airport indicates that there is an accessible bathroom in this area. However, these particular bathrooms are not purpose-built accessible bathrooms and are not the correct dimensions to facilitate a wheelchair.

Figure 8: Sign indicating accessible bathroom (bathroom is not accessible)



Figure 93: Corrected Sign

Since the inspection, Donegal Airport has implemented this change, and the sign no longer indicates that there is an accessible bathroom. There are two other accessible bathrooms available to passengers in the main concourse (check in/cafe) and after security.

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.]”⁶

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.”⁷*

The airport receives requests for assistance through the airlines (Loganair and Aer Lingus). The airport also uses the PRM Assist Application which is also available for passengers to download on a

⁶ Regulation (EC) 1107/2006 Article 6(2).

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

mobile phone.⁸ The airport informed the IAA, however, that it has many passengers who are not pre-notified for assistance. As all customer service staff are trained to provide assistance, this does not pose any significant resourcing issues. During the 2022 inspection, it was highlighted that the airport was set to have a trial run of the PRM Assist Application in 2023. The application allows passengers to prebook the required assistance through the application, which then sends the information to the airport. See below figures as an example of making a booking through the PRM Assist application.

Figure 10: Opening page on PRM Assist App when booking airport assistance

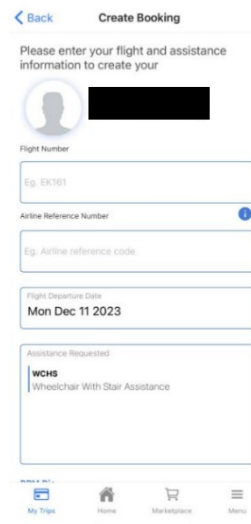
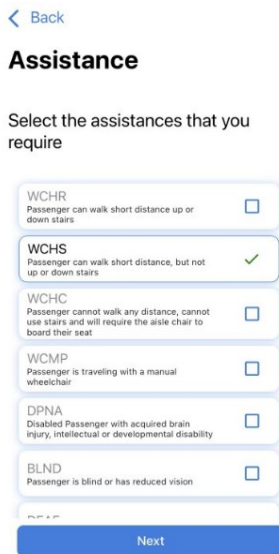


Figure 11: 'Create Booking' page on PRM Assist App

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.”⁹

Donegal Airport confirmed no issue with providing the required assistance to passengers with reduced mobility or persons with disabilities. The airport has sufficient staff to meet the current need of PRMs arriving and departing from Donegal Airport.

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.”¹⁰

⁸ The PRM Assist Application is a private company and not in any way associated with the IAA. Passengers can download the app for their own personal use.

⁹ Regulation (EC) 1107/2006 Article 7(1).

¹⁰ Regulation (EC) 1107/2006 Article 8(1).



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.”¹¹

Assistance is provided by the airport itself by customer service staff and ground handlers. The airport has twelve ground crew personnel who provide assistance to WCHC (assistance through the airport to aircraft seat) PRM using the S-Max Chair Lift if necessary.

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.”¹²

As the airport’s annual traffic is less than 150,000, the airport is not obliged to create and/or publish Quality Standards.

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;

(c) ensure that, upon recruitment, all new employees attend disability-related training and that personnel receive refresher training courses when appropriate.”¹³

Training has been provided to all customer facing staff and ground handlers. The Security Manager has developed disability awareness and equality training in conjunction with training created by Airport Council International (ACI). The airport is also in partnership with the [Hidden Disability Sunflower organisation](#) which provides training on hidden disabilities. All staff receive disability awareness and disability equality training when they are onboarded and there is refresher training every three years. Ground handlers provide the WCHC assistance which may require lifting the passenger into their seat on the aircraft. For this reason, ground handlers should have the additional manual handling training in order to provide this assistance safely. Donegal Airport confirmed that the ground handlers receive this level of training.

The airport confirmed that all security screening personnel follow the requirements set out in the National Civil Aviation Security Programme in relation to the security screening of persons with

¹¹ Regulation (EC) 1107/2006 Article 8(3).

¹² Regulation (EC) 1107/2006 Article 9.

¹³ Regulation (EC) 1107/2006 Article 11.

reduced mobility or disabilities. The airport confirmed that “for all passengers with reduced mobility, the nature of the passenger’s disability is taken into account when choosing the method of screening. All mobility equipment is screened by hand search and other supplementary methods.” While the airport does not provide passengers with screening information prior to travel, the airport stated that this was to protect the integrity of the screening procedure. While the airport is not obliged to advise passengers of the security procedures to protect the integrity of security screening process, the airport can also provide PRMs with the basic policy specific to that airport and would be considered best practise.

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.”¹⁴

Donegal Airport confirmed that it will fulfil this obligation if required.

The airport also stated that due to the small size of the airport building (check in area and gate area), it is easy to locate the passengers who have booked assistance should a disruption or issue arise. In this way, the airport can easily inform passengers of their right to care and assistance as per Regulation (EC) 261/2004.¹⁵ The airport liaises with the airline to organise transport for passengers to their destination or to a hotel (if required) when their flight is disrupted.

3.8. Article 15: Complaint Procedure

“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.”¹⁶

The airport confirmed that it can receive complaints by email, telephone and by post. This ensures that there are multiple methods by which passengers can submit a complaint regarding the assistance they received.

4. General Comments

It is relatively easy for passengers with reduced mobility to utilise Donegal Airport. While the airport is only serviced by one public bus, there is sufficient parking spaces for passengers to use. Three of these spaces are designated as accessible parking spaces and are clearly marked as such. They are located in very close proximity to the entrance of the airport entrance.

¹⁴ Regulation (EC) 1107/2006 Article 12.

¹⁵ Regulation (EC) 261/2004 Article 11 outlines the specific needs of persons with reduced mobility in the event of a flight disruption. These obligations on the airline and the airport derive from Reg. (EC) 261/2004 rather than Reg. (EC) 1107/2006.

¹⁶ Regulation (EC) 1107/2006 Article 12.

The airport is a partner of the Hidden Disabilities Sunflower and has previously accommodated familiarisation days for passengers with Autism. Additionally, the airport supplies Sunflower lanyards at the check in desk for passengers to use (and keep) if desired. This initiative taken by the airport is welcomed by the IAA. The airport also facilitated (in conjunction with Emerald Airlines) a training day for guide dogs. It welcomed the guide-dogs-in-training in the airport and the dogs were also trained with embarking and disembarking the aircraft with their handlers.

Though the airport does not have designated PRM seating in the departure gate area, there are four 'Age Friendly' seats close to the boarding desk. The airport confirmed that all PRMs are brought to the seating in front of the gate desk so that they can board the aircraft first.

Designated PRM Seating in Gate Area

The airport has four 'Age Friendly' seats reserved for passengers in the departure area. However, there was no designating seating for PRMs or persons with disabilities.

The IAA recommends the airport reserve or label the seats closest to the departure gate as those for the PRM passengers to ensure that those seats remain free. Passengers with a hidden disability will also be able to utilise these seats without having to announce their disability to staff.

Figure 12: Row of seats in Gate 2 in Departures

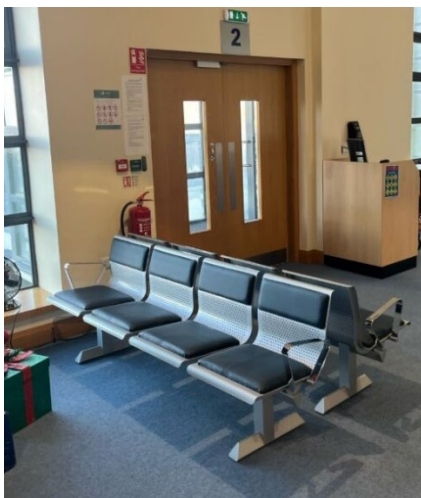


Figure 13: Seating area in gate area with stickers reserving them for PRMs or Persons with Disabilities



Since the inspection, Donegal Airport has implemented this recommendation. The airport now has designated seats which are reserved for persons with disabilities and persons with reduced mobility by way of signs on the seats themselves.

5. Summary Findings

Donegal Airport has met all of its obligations under the Regulation and provides assistance to passengers who require it. However, improvements are needed in a few areas in order for the airport to become further compliant. A key recommendation was for the airport is to standardise its signage and to ensure that the signage for accessible bathrooms is accurate and not misleading to the passenger. Prior to the publication of this report, Donegal Airport had accepted this recommendation



and updated its signage. Providing assistance in line with its obligations under the Regulation demonstrably important to the airport management body. The airport provides a call point on arrival for passengers and has relatively uniform signage throughout the airport building. The IAA has highlighted where improvements can be made in this area in Section 5.1. Donegal Airport has satisfied its obligations under Article 6, 7 and Article 8 of the Regulation. There was no evidence of any resourcing issues which would prevent passengers from exercising their right to assistance.

As the airport has less than 150,000 annual commercial passenger passengers, the airport is not required to establish and publish Quality Standards as per Article 9. Despite not requiring Quality Standards, the airport is committed to ensuring a high quality of assistance for passengers. The IAA confirms that all necessary training required under Article 11 has been completed by airport staff. Additionally, as the airport officially recognises the Hidden Disabilities Sunflower, training is also provided to the airport through this organisation. The IAA is satisfied with the airport's compliance with Article 12 Compensation for Lost or Damaged Mobility Equipment and Article 15 Complaints Procedure.

Donegal Airport building is small yet spacious and has two large accessible bathrooms, one in the main concourse and a second in the departures area. While there is no accessible bathroom in the baggage hall, the main concourse bathroom is easily reached once you have passed through customs and retrieved baggage. The airport has not experienced any resourcing issues, despite receiving non-pre-notified PRM passengers, this is largely because all staff are trained to provide assistance. Accordingly, the airport has satisfied both Article 7 and Article 8 of the Regulation in being properly staffed to provide the assistance in Donegal Airport for persons with reduced mobility and persons with disabilities.

