



# Airport Accessibility Compliance Report 2024

DONEGAL AIRPORT





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## 1. Executive Summary

The IAA is the single civil aviation regulator for Ireland and is 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 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),<sup>1</sup> as well as training information and the type and quantity of mobility equipment and informs the IAA as to the PRM operations at the airport. Donegal Airport was inspected in April 2024 for its compliance with the Regulation. The airport provided all answers to the questionnaire prior to the inspection and assisted the IAA on the day of inspection in ensuring all elements of the Regulation were reviewed in the airport. Due to the annual passenger numbers being under 150,000 passengers, the airport is not obliged to create and/or publish Quality Standards.

Airport	Total Passenger <sup>2</sup>	Total PRM	PRM % of Total Pax
Dublin Airport	34,645,117	446,348	1.29%
Cork Airport	3,070,511	33,682	1.10%
Shannon Airport	2,104,361	26,270	1.25%
Ireland West Airport	833,860	14,458	1.73%
Kerry Airport	417,409	3371	0.81%
Donegal Airport	24,593 <sup>3</sup>	372	1.51%

Figure 1: All Passenger and PRM numbers from all Irish Airports 2024

The number of PRM numbers for 2024 was 372 passengers. Donegal Airport only counts outbound passengers toward both its total passenger numbers and its total PRM numbers. The PRM number is collected from the airline systems and requests for assistance made through the PRM Assist Application. The airport includes pre-notified and not pre-notified passengers in the PRM figure of 372 passengers.

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<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> The PRM number is provided by the airport, and the total passenger number is collected from the Central Statistics Office. Donegal Airport passenger number is from the airport, not the CSO. Donegal Airport only counts outbound PRMs and thus only outbound general passengers are included in ‘Total Passenger’. Further information can be found here: <https://www.cso.ie/en/statistics/transport/aviationstatistics/> The PRM numbers are provided by the airports themselves to the IAA as the PRM number is not counted by the CSO.

<sup>3</sup> Donegal Airport total passenger number is for outbound only.

## 2. Overview

### 1.1. 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.”<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. The definition of Persons with Reduced Mobility is extended to include those with hidden disabilities. 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.

### 1.2. 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 set out 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 report’s sections will briefly summarise the relevant Article and the airport’s compliance with these articles in the Regulation, as well as the IAA’s commentary from the inspection. The IAA has issued findings 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 regarding the airport’s compliance under the Regulation.

### 1.3. 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.

## 1.4. Inspection Methodology

### 1.4.1. 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.

### 1.4.2. 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.

### 1.4.3. 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 findings made. These timeframes are outlined in the published report.

### 3. Inspection Findings 2024

On 17 April 2024, the IAA conducted an inspection of Donegal Airport to assess the airport's compliance with Regulation (EC) 1107/2006. The following sections provide an analysis of 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.

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

Compared to other commercial passenger airports in Ireland, Donegal Airport has the lowest number of PRM passengers. However, taken as a percentage of the total passenger numbers, the passenger data indicates that the airport performs similar to other regional airports with 1.152% of all passengers being PRMs.

All passengers utilise one point of arrival at Donegal Airport, whether arriving by car or by bus. If a passenger is arriving by car, a sign on the car barrier (Figure 2) advises passengers of the procedure for PRMs receiving assistance from the car park. Donegal Airport staff confirmed that if a passenger calls for assistance using this call button, a member of staff will meet the passenger in the car park and assist them into the airport building.



Figure 2: Sign indicating PRM services on airport entrance barrier.

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

Donegal Airport has one main vehicle entrance that all modes of transport enter through: bus, cars and taxis. The bus stop is in front of the main airport building and is located a short distance from the entrance. The taxi drop off area is also located in this general area in front of the airport's main entrance. The car park, drop off (taxi and car), and bus stop are all located in close proximity to the main entrance of the airport.

The distance from the bus/taxi drop off to the check in desk (which also serves as the assistance desk) is short. Passengers also have the option of calling the airport ahead of time should they require assistance from the car park to the main entrance. Currently there is no call point at the bus stop and the IAA recommend that a call point could be installed at the bus stop. However, the airport did not advise of any issues with the current system.

The second important element of Article 5 is the presence of clear and correct signage throughout the airport. Appropriate signage can aid passengers in wayfinding but also the location of services throughout the airport, especially services for PRM passengers.

*Article 5(2): "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."<sup>6</sup>*

The IAA confirms that reserved seating has been implemented in the airport following the 2023 inspection and was observed during the 2024 inspection. See Figure 3 below. The reserved seating is clearly identifiable.

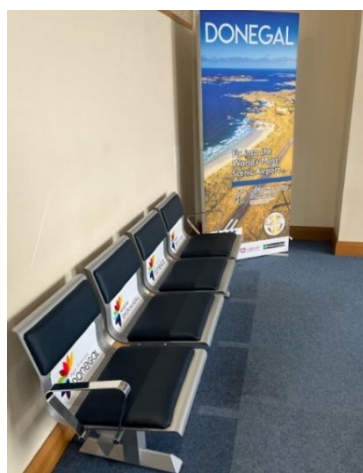


Figure 4: Age Friendly designated seating in the gate area.

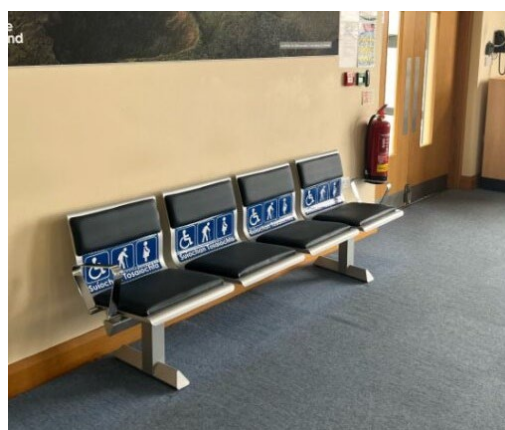


Figure 3:PRM designated seating in gate area.

Donegal Airport has a variety of wayfinding and PRM related signage throughout the airport, all mostly uniform in size and colour.

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<sup>6</sup> Regulation (EC) 1107/2006 Article 5.



Figure 5: Toilet sign arrivals.



Figure 6: Accessible toilet sign departures.

Donegal Airport has also updated the accessible signage following the inspection and the IAA is satisfied that the findings were correctly addressed. Figure 5 and Figure 6 incorrect signage has now been removed.

### 1.5.1. Article 5 Findings:

#### *Signage*

The airport has updated the accessible toilet signage following the airport inspection.

#### *Call Point*

The IAA recommends that the airport should include contact details for the assistance desk (such as a phone number) at the bus stop outside the entrance to the airport. A sign with the assistance contact number that is accessible to passengers once they have been dropped by the bus/car would ensure all passengers can call for assistance from the carpark/drop off.

*Donegal Airport has committed to including a phone number at the bus stop as a secondary measure and will implement this finding as soon as possible.*

## 1.6. 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>7</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*

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<sup>7</sup> Regulation (EC) 1107/2006 Article 6(2).

*reduced mobility on that flight requiring assistance specified in Annex I and of the nature of that assistance.”<sup>8</sup>*

Aer Lingus and Loganair both operate flights at Donegal Airport. The airport confirmed it receives assistance requests directly from the airline, through email from passengers, and through the PRM Assist application (on smartphones/android phones). The Regulation states that passengers must request assistance within 48 hours of departure to be considered ‘pre-notified’, however, this request for assistance must only be forwarded to the airport 36 hours prior to departure. As this presents a small window of time for the airport to prepare staffing levels to provide assistance, airports such as Donegal are utilising alternative methods for receiving assistance requests which are discussed below.

The airport confirmed that using email and the mobile PRM Assist app has helped with regards to planning for assistance requests. Once a passenger makes a flight reservation, they can then contact the airport through email or the PRM Assist app to confirm their assistance. In this scenario, the passenger has confirmed their assistance with the airport weeks or months in advance.

### 1.7. 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>9</sup>*

Donegal Airport confirmed to the IAA that there were no issues with providing the required assistance to passengers with reduced mobility or persons with disabilities in 2024. The airport has 17 staff members who are all trained to provide PRM services should it be required.

### 1.8. 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>10</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:

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<sup>8</sup> Regulation (EC) 1107/2006 Article 6(4).

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

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

*“...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>11</sup>*

The assistance is provided by the customer facing staff and the ground handlers at Donegal Airport. Ground handlers provide the assistance which requires manual handling such as using the S-Max stairs climber or for transferring passengers from an aisle chair to their cabin seat.

## 1.9. 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>12</sup>*

As the airport’s annual passenger number is less than 150,000, the airport is not obliged to develop and/or publish Quality Standards. Additionally, the airport does not levy a charge on the airlines for the assistance provided.

## 1.10. 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.”<sup>13</sup>*

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.

The training materials for Donegal Airport were developed in house. The trainer for the airport received training through Airports Council International (ACI) and thus developed in-house training for all staff which encompasses disability awareness and disability equality training. All staff members are trained in the two areas of disability awareness and disability equality training. The airport also confirmed the security team has separate training which also encompasses a section of

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

<sup>12</sup> Regulation (EC) 1107/2006 Article 9.

<sup>13</sup> Regulation (EC) 1107/2006 Article 11.

conducting searches for PRMs. The airport confirmed that persons with disabilities or reduced mobility are screened in a manner that is appropriate for them. For example, a person who is travelling with an assistance dog will have a different security screening compared to a person who might have medical device implant. Ground handlers provide the WCHC assistance which may require lifting the passenger into their seat on the aircraft.<sup>14</sup> For this reason, ground handlers should have the additional manual handling training to provide this assistance safely. Donegal Airport confirmed that the ground handlers receive this level of training.

The airport confirms that all staff have certificates confirming completion of the above training.

### 1.11. 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>15</sup>*

The airport confirmed, should there be any damage caused to mobility equipment or if the mobility equipment is lost, the airport would liaise with the air carrier for replacement of equipment or repairing of mobility equipment. If a passenger’s mobility equipment is lost or damaged, the airport will facilitate a wheelchair replacement. It is important to note that the temporary replacement of mobility equipment may not be on a like for like basis, which is outlined in Annex I of the Regulation. The term “compensation” in this article refers to reimbursement for repairs to mobility equipment or fully replacing the damaged equipment. This is in accordance with maximum amounts of compensation as stated by international, Community and national law.<sup>16</sup>

### 1.12. 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.”<sup>17</sup>*

Donegal Airport confirmed that it receives and accepts complaints via phone, email, letter, in person and on social media.

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<sup>14</sup> The International Air Transport Association explains ‘WCHC’ as meaning “passenger completely immobile; requires wheelchair to/from aircraft/mobile lounge and must be carried up/down steps and to/from cabin seat.”

<sup>15</sup> Regulation (EC) 1107/2006 Article 12.

<sup>16</sup> The Montreal Convention governs the loss or damage of mobility equipment at the international level. Article 22 outlines the amount a passenger is entitled to for their lost or damaged mobility equipment which is currently approximately €1,272.00.

<sup>17</sup> Regulation (EC) 1107/2006 Article 12.

The IAA confirms that, as of the date of the inspection, there are no ongoing complaints that have been submitted to the IAA regarding the assistance provided at Donegal Airport.

## 4. Summary Findings

Finding	Article (Regulation EC 1107/2006)	Corrective Action Plan	Timeline
Call Point	Article 5	Include sign with phone number by bus stop (in lieu of call point). Sign should also have braille.	Airport has advised corrective action will be taken.
Signage	Article 5	Remove misleading accessible toilet sign.	Completed.

Figure 7 Table of Findings

## 5. General Comments

Donegal Airport is a convenient airport to navigate due to its open plan design and size. Signage is relatively uniform and there is an abundance of seating for passengers. PRM passengers are also assisted by the airport should a disruption occur such as a cancellation or long flight delay. The airport confirmed that it would liaise with the airline to ensure PRMs received the Care & Assistance as stipulated by [Regulation \(EC\) 261/2004](#).

All mobility equipment (wheelchairs and [S-Max Stairclimber](#)) was seen to be in good working order and the airport confirmed that there are periodic servicing and visual inspections done on the equipment. The airport does not have (nor requires) airbridges and all aircraft are boarded via stairs or using the S-Max Stairclimber should the need arise.

Some airports have developed their own identifier for hidden disabilities or alternatively, airports have chosen to recognise the Hidden Disabilities Sunflower. Other emblem/identifiers are available both in Ireland and internationally, however, the IAA has found that the Hidden Disability Sunflower appears to be the most used and recognised throughout airports in Ireland. Indeed, Donegal Airport officially recognises the [Hidden Disability Sunflower](#) and provides lanyards to passengers should be they require one.

The airport has advised that the accessible parking spaces are provided free of charge once a passenger has presented their accessible badge at the check in/information desk.



Figure 8: Guide and Assistance Dogs Welcome sign.

## 6. Conclusion

Donegal airport caters to persons with reduced mobility and persons with disabilities and provides the services as outlined by Regulation (EC) 1107/2006. Donegal Airport has the lowest number of PRMs amongst the six commercial passenger airports in Ireland. However, its percentage of PRMs travelling (1.51%) is similar to those of the other airports. Overall, the airport management body takes all aspects of the Regulation into consideration and has often provided the ramp area (area where the aircraft is, after the terminal gate) for disability organisations to conduct training. The open plan nature of the building ensures ease of access for passengers, while still being able to check on the details of their flight. Additionally, the check in and information desk were clearly identifiable. The airport has committed to including a phone number at the bus stop as a secondary measure under Article 5.

The IAA will continue to monitor the airport's improvements for PRM passengers in 2025.

