

Airport Accessibility Compliance Report 2024 Ireland West 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 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.

Ireland West Airport was inspected in July 2024 and has implemented all findings outlined in the 2023 IAA Airport Accessibility Compliance Report. These findings were reviewed prior to and during the 2024 inspection. The airport provided all answers to the questionnaire prior to the inspection and assisted the IAA on the day, ensuring all airport-related elements of the Regulation were reviewed for compliance. In August 2024, the airport provided its 2023 audited accounts which outlines the PRM charge collected by the airport which is used for the provision of PRM services in Ireland West Airport. The IAA's findings have been communicated to the airport to ensure compliance with Regulation (EC) 1107/2006. Figure 1 indicates that Ireland West Airport has a total of 14,458 PRMs which is 1.73% of the general passenger number.

Airport	Total Passenger ²	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	24,593³	372	1.51%

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

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 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.

³ Donegal Airport total passenger number is for outbound only.

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 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."

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.

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 report's 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 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 General Comments and Summary Findings.

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.

⁴ 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 & 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 the 16 July 2024, the IAA 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. The section 'General Comments' will outline all initiatives or best practices not already outlined in the articles.

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."⁵

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.

Upon entering the airport's boundary, there are signs which indicate the location of accessible parking. There is one designated exterior call point located close to the accessible parking spaces and the terminal entrance at Ireland West Airport. The airport advised that passengers who require assistance from the car

⁵ Regulation (EC) 1107/2006 Article 5.

park can use the call point to request such assistance and an agent will provide assistance from this point. This assistance could potentially be 'meet and assist' or perhaps include wheelchair assistance. The help point has a small shelter and seat should a passenger require it.



Figure 2 Exterior PRM Call Point

As noted in the IAA's 2023 Airport Accessibility Compliance Report, the volume on the call point was not at an appropriate level. Unfortunately, on the day of the inspection, the volume on the call point was at the same or similar volume as to the 2023 inspection. However, the airport confirmed that this call point is not regularly used and that an assistance agent will come outside the airport building to check the shelter if the help point is called but no one can be heard. This occurred while the IAA team were testing the call point and an agent came outside to ensure there wasn't a passenger awaiting assistance. While the airport recognises that this is not a permanent solution, they confirmed that it is planned for this call point to be upgraded and for it to include a camera to monitor usage.



Figure 4 Ramp to Terminal Entrance



Figure 3 PRM Help Point Sign

The signage outside the airport building is clear, easy to follow and directs passengers to either a ramp or stairs to access the terminal entrance. The Zebra Crossing has tactile paving to alert passengers to its presence. As was noted in previous reports, the tactile paving does not extend to the entrance of the airport building which is located a short distance from the zebra crossing on the passenger's left-hand side.

Upon entering the terminal entrance, the Customer Service desk is located to the left of the doorway. Unfortunately, there is no signage indicating the location of the desk. Once a passenger presents at the desk, the customer service agent will take their details and then ensure that they receive the assistance from this point. There are seats available for passengers to wait across from the customer service desk. From this point, the passenger will be taken by wheelchair through security via a separate entrance to

other travellers. The airport confirmed that they will give the passenger approximately 30 minutes of time in Duty Free Shopping or at the café/restaurant if the passenger has presented at the airport with enough time to allow for this. This will only be accommodated if the passenger arrives on time to the airport and is not guaranteed. The gate area has signage indicating the location of the accessible toilets and there is a designated PRM seating area in the middle of the two main gates. This signage is different in colouring (black and grey) and is located on the floor in front of the seats. See Figure 5 Reserved PRM Seats below.



Figure 5 Reserved PRM Seats

The airport benefits from having the majority of its services on one level. There is one restaurant prior to security located on a second level, however, there is a lift available for passengers to access this facility.

Signage throughout the airport is mostly uniform and is in the recognised colours of white and blue with the international symbol of access. Toilets and changing places are signposted where appropriate, including facilities for parents with infants.



Figure 8 Accessible Changing Place Sign



Figure 7 Accessible Toilet Sign



Figure 6 Accessible Toilet Sign Arrivals

3.1.1. Article 5 Findings:

Signage

The airport should review its current signage to ensure its uniform throughout the airport and in line with industry standards for accessibility. Additionally, the airport should input a sign in the main entranceway showing the location of the customer service desk.

Plan to Replace Exterior Call Point

While the airport has confirmed that there is a plan in place to upgrade the call points, the airport is required to provide information to the IAA regarding this improvement plan and a timeframe for same. As this call point has been in need of upgrading since the 2023 inspection, the corrective action plan for this finding is high priority.

Since the inspection, the airport has confirmed that the volume on the call point has been fixed with an upgrade planned for 2026.

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."

This article places an obligation on the airline to ensure that the request for assistance made by the passenger is sent in good time to the airport – ideally at the time of booking. The Regulation states that passengers must request assistance within 48 hours of departure to be considered 'pre-notified', however, this request for assistance must be forwarded to the airport 36 hours prior to departure. Ireland West Airport receives requests for assistance through the airline messaging system called "SITA." They can also receive assistance requests directly from passengers if they contact the airport separately. The airport monitors those who have requested assistance (known as pre-notified) and those that request assistance after arriving at the airport (known as not pre-notified).

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

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

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

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."8

Article 7 is read in conjunction with Article 6 and Article 8, which codifies the right to assistance at an airport but also highlights the importance of pre-notification of assistance requirements (Article 6). Pre-notification by passengers ensures that the airport is equipped with enough staff to provide the necessary assistance. If a passenger does not pre-notify their requirements, the airport is required to make *all reasonable efforts* to provide the passenger with assistance. This means that while the airport can provide the assistance, it is subject to additional waiting periods which are longer compared to the pre-notified waiting periods.

Ireland West Airport has confirmed that all passengers will receive assistance, even if they have not prenotified. For passengers who have not pre-notified, the airport should make all reasonable efforts to provide the assistance as requested. The airport advised that they would communicate to the passenger any possible wait time due to lack of pre-notification.

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."

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." ¹⁰

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. This specific charge thus funds this assistance. The airport has trained 32 customer service agents to provide assistance up until the boarding gates. As stated, the airport is required to provide the assistance free of charge to passengers.

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." ¹¹

The airport has developed <u>Quality Standards</u> with the most recent version in 2021. In the IAA's 2023 Airport Accessibility Compliance Report, the airport was required to update information in the document

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

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

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

¹¹ Regulation (EC) 1107/2006 Article 9.

relating to codes for assistance. In a post-inspection meeting, the airport confirmed that these findings were implemented and the document was updated accordingly.

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 passenger accessibility and developed the document based on industry 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-."¹²

Ireland West Airport provides in-house training for those who provide assistance to passengers. The airport has provided training to all customer service agents to ensure that all personnel can provide the assistance should it be required. There are currently 25 staff between Customer Service and Ground Service who are fully trained to meet the demands of providing PRM assistance to passengers. The airport confirmed that all customer facing staff receive disability equality and disability awareness training. The airport provides refresher courses for staff when appropriate.

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." ¹³

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 airport confirmed that they will fulfil this obligation if required. The term "compensation" in Article 12 refers to reimbursement for repairs to

¹² Regulation (EC) 1107/2006 Article 11.

¹³ Regulation (EC) 1107/2006 Article 12.

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.¹⁴

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." ¹⁵

The airport confirmed that it can receive complaints via email, letter, and through social media. The airport's website provides phone numbers and email addresses, along with a 'Feedback Form' for passengers to use. The 'Contact Us' page does not provide a specific channel for passengers to use for complaints. The airport has a specific webpage for 'Special Assistance', which provides a link for the airport's Quality Standards and some information regarding the facilities available at the airport. The airport's procedure is to engage with the passenger to discuss the issues and investigate the complaint. This may include interviewing staff where appropriate to establish what happened. If the staff notice any issues, they will also report this to the supervisor who submits a supervisor report, in this regard the airport proactively manages any issues with the PRM passenger experience. The airport confirmed that it currently does not have any complaints relating to PRM assistance.

The IAA confirms that in 2024 there were no open complaints relating to the assistance provided by Ireland West Airport.

3.9. General Finding:

Website Information

While the airport improved its Special Assistance page on the webpage based on findings from the IAA in the 2023 Airport Accessibility Compliance Report, it is advised that the airport reviews its 'Special Assistance' page to consider a full update of same. The airport is required to provide updates to the IAA regarding their website.

Since the inspection, the airport has confirmed that a review and updates have been done on the website.

4. Summary Findings

Finding		Article	Corrective	Timeline
		(Regulation	Action Plan	

¹⁴ 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.

¹⁵ Regulation (EC) 1107/2006 Article 12.

	EC			
	1107/2006)			
Call Point	Article 5	Replace	Larger	
		exterior call	upgrade	
		point.	project to	
			commence	
			in Q1 2026	
Website	Annex I	Review	Completed.	
Information		Special		
		Assistance		
		webpage to		
		ensure		
		accessible,		
		accurate		
		information		
		for		
		passengers.		

Table 1 Table of Findings

5. General Comments

The airport has taken its own initiatives to ensure that it is accessible for passengers, including installing a changing place in landside next to Arrivals. This was installed after a request came from a passenger and includes a full hoist. The airport has shown to consider the passenger experiences and endeavours to improve that experience where possible. While the exterior call point is not currently in regular working order, the airport has in place a contingency plan by which customer service agents physically check the call point if a call is made but no passenger can be heard. The airport has made note of the call point and intends to replace same. The airport has two Ambulifts which receive an annual on-site service. Regular checks are also done by a third-party company. The airport also utilises wheelchairs to assist passengers with their journey. The airport stated that the busiest type of assistance for the airport are passengers requesting 'WCHR' assistance (assistance through the airport but can board the aircraft without any assistance). The airport also advised that their 'WCHS' passengers are most likely to be regular passengers at the airport. The WCHS passengers require assistance through the airport and up the stairs of the aircraft but can make their own way to their seat.

The airport is an official partner with the Hidden Disability Sunflower organisation, which provides further training to staff regarding neurodivergent passengers. While not all staff have received the hidden disability training, the airport's intention is to have the training fully rolled out by April 2025. The airport

has several plans to improve the PRM experience which were discussed with the IAA on the day of the inspection. The IAA believes these plans all to be beneficial to passengers.

6. Conclusion

Ireland West Airport caters to persons with reduced mobility and persons with disabilities and provides the services as outlined by Regulation (EC) 1107/2006. The airport utilises wheelchairs, Ambulifts, and aisle chairs to assist passengers on and off the aircraft. As outlined in this report, the airport meets each obligation in the Regulation. As noted in this report, there are several improvements which could be made to ensure a seamless travel experience for persons with reduced mobility or disabilities. During the airport's discussions with the IAA regarding the PRM services, it was noted that the airport has taken a proactive approach to any issues which have arisen during the PRM's travel experience. This could include communicating with a certain airline or third party if a pattern is noticed relating to the quality of the PRM assistance. The airport requires improvement with its call point system and signage in the main entryway. At present, the airport has developed a system such that these requirements do not affect the PRMs' journey. However, the IAA notes that these upgrades or additions would only improve the passenger experience. Additionally, the airport has already confirmed that some of the suggested improvements are already on the airport's agenda for 2025.

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