



***Consultation: Revised CAA proposal on information for PRM passengers – Airlines and Airports***

***Date: June 2014***

***Contact: Scott Kennerley***

## Introduction

The General Consumer Council for Northern Ireland (the Consumer Council) is an independent consumer organisation, working to bring about change to benefit Northern Ireland (NI) consumers. Our aim is to *'make the consumer voice heard and make it count'*.

We have a statutory remit to promote and safeguard the interests of consumers and have specific functions in relation to energy, water, transport and food. These include considering consumer complaints and enquiries, carrying out research and educating and informing consumers. In addition, from April 2014, we have taken on responsibility for representing consumers in respect of postal services in NI.

The Consumer Council is also a designated body for the purposes of supercomplaints, which means that we can refer any consumer affairs goods and services issue to the Competition and Markets Authority, where we feel that the market may be harming consumers' best interests. In addition, we have 'supercomplainant' status for financial services, with powers to bring supercomplaints on financial matters to the Financial Conduct Authority (FCA).

In taking forward our broad statutory remit we are informed by and representative of consumers in NI. We work to bring about change to benefit consumers by making their voice heard and making it count. To represent consumers in the best way we can, we listen to them and produce robust evidence to put their priorities at the heart of all we do.

The Consumer Council welcomes the opportunity to respond to the Civil Aviation Authority's (CAA) proposals on information for PRM passengers – Airlines and Airports.

### *Airline and Airport Information*

The Consumer Council is disappointed that the CAA no longer intends to develop and publish on its website, a matrix comparing the information provided by (the largest) airports and another for airlines. This would have been a beneficial tool and reference point for passengers with disability or reduced mobility (PRMs) and their carers to assess the assistance available when selecting and arranging air travel.

That said the Consumer Council welcomes the CAA's proposals for requirements for airlines and airports to publish key information relevant to PRMs. Information is vital for all passengers, but in this instance especially for those passengers who have a disability or reduced mobility, as information on the assistance available throughout the journey allows them to make decisions about their specific needs, helping build confidence to travel by air.

The Consumer Council supports the proposal that information should be presented in a clear and easy to understand way, which is accessible for blind and disabled users and users with a learning disability. Airline and airports must consider the accessibility of their websites particularly in regards to the size of text, colour of text and background, the use of moving images, spacing between paragraphs as well as the level of

information provided. The accessibility of how information is displayed must also be considered when airlines send correspondence, such as booking confirmations and tickets to passengers, especially when a passenger has identified during the booking process these requirements.

The Consumer Council welcomes the CAA's proposal for a standardised title across all airlines and airports websites for the special assistance information as this ensures consistency across websites making it easier for passengers to identify the location of the information they need.

The Consumer Council agrees that this information should be easily found from the homepage. If all the information is to appear on one webpage the Consumer Council suggests the use of links to the relevant paragraphs on that page to allow the user to navigate easily to the information that they require.

We strongly advocate the use of symbols as a means of identifying relevant information pages. The wheelchair symbol is an internationally recognised symbol of access and passengers with a disability or reduced mobility have told the Consumer Council that often the wheelchair symbol is the first thing they look for when searching for information on assistance on airline websites or for assistance points within an airport.<sup>1</sup>

---

<sup>1</sup> Focus group with passengers with a disability or reduced mobility, May 2014

## *Annex A – Specified ‘subject areas’ for PRM information for Airlines*

The Consumer Council welcomes the subject areas listed in Annex A of the consultation.

In addition to the safety rules that may prevent an airline from accepting a reservation, the airline should explain any other reason that may prevent it from taking a booking, for example the number of allocated seats for passengers with a disability or reduced mobility. Consumers have told the Consumer Council of their frustration of spending considerable time going through the booking process to find out at the final stage that all allocated spaces for passengers that require assistance have been allocated.<sup>2</sup>

In relation to information on seating onboard, if possible the airline should indicate the amount of extra legroom that is available on specified seats. It should also be clear the airline’s policy regarding extra legroom seats that are not available for PRMs to book, for example at emergency exits.

The Consumer Council suggests airlines should also publish information for passengers with a visual or hearing impairment relating to how safety information will be provided, for example, information in accessible formats or individual safety briefings onboard.

---

<sup>2</sup> Focus group with passengers with a disability or reduced mobility, May 2014

Where telephone numbers are provided, the opening hours of the assistance line, along with any associated cost to telephone that line should be clearly stated. Alternative contact methods should also be available and listed for passengers with a hearing impairment such as text phone or email.

### *Annex A – Specified ‘subject areas’ for PRM information for Airports*

The Consumer Council welcomes the inclusion of the subject areas listed in Annex A of the consultation document. In addition to the telephone number of airport’s helpline the opening hours of the assistance helpline and any costs associated with contacting it. Alternative contact methods should also be available and listed for passengers with a hearing impairment such as text phone or email.

Airlines should also explain how passengers can contact assistance staff at the airport. Passengers have told us of experiences of when disembarking a plane with other groups of passengers they were left in areas for a considerable period without any means to contact assistance staff.<sup>3</sup>

**If you wish to discuss any aspect of this response in more detail please do not hesitate to contact Scott Kennerley on 028 9067 2488 or via email on [scott.kennerley@consumercouncil.org.uk](mailto:scott.kennerley@consumercouncil.org.uk).**

---

<sup>3</sup> Focus group with passengers with a disability or reduced mobility, May 2014



**The Consumer Council**

# ***Making the consumer voice heard and making it count***

Elizabeth House  
116 Holywood Road  
Belfast  
BT4 1NY

Telephone: 0800 121 6022  
Textphone: 028 9067 2488  
Fax: 028 9065 7701  
E-mail: [info@consumercouncil.org.uk](mailto:info@consumercouncil.org.uk)  
Website: [www.consumercouncil.org.uk](http://www.consumercouncil.org.uk)