



ABTA response to the Department for Transport's draft Accessibility Action Plan November 2017

About ABTA

This response is submitted on behalf of the membership of ABTA – The Travel Association. ABTA was founded in 1950 and is the largest travel trade association in the UK, with almost 1,200 members and over 4,400 retail outlets and principal offices. Our Members range from small, specialist tour operators and independent travel agencies specialising in business and leisure travel, through to publicly listed companies and household names.

The success of ABTA Members' businesses is directly reliant on the UK's aviation infrastructure; some of ABTA's larger Members are themselves part of groups that own airlines.

Annually, ABTA Members' turnover is in excess of £37 billion. ABTA's focus is ensuring that Members can operate their businesses in a sustainable and successful manner, enabling their customers to travel with confidence.

ABTA welcomes the opportunity to submit to this consultation. Although the consultation covers all transport modes, our submission will predominately focus on the proposed actions and questions relating to air travel and affects passengers accessing UK airports. Although ABTA's work on accessibility has tended to focus on air travel, the experiences learnt have been fed into work on the other modes of transport.

Executive Summary

- Accessible flights and holidays have been an important sector of the travel market for many years requiring good customer service from ABTA Members.
- ABTA provides its Members with support and practical guides to ensure that disabled and less mobile passengers get the most out of their travel and holiday arrangements.
- ABTA believes that all stakeholders involved in providing services in the aviation sector are pulling together to give the passenger as seamless an experience as possible.
- ABTA's ongoing work on improving surface access to airports includes calling for a modern integrated transport system that offers greater accessibility for passengers with disabilities and Passengers of Reduced Mobility (PRMs).
- Over the years, airlines and airports have invested heavily in facilities to make it easier for people with disabilities and PRMs to travel. However, we recognise that more could be done, particularly around the transfer of information from agents to airlines, as well as at airports, following the latest CAA report which rated four (including Heathrow) out of 30 airports in the UK as "poor" for offering assistance to their customers with a disability.¹
- ABTA has worked with its Members to make them fully aware of their complaint handling obligations, as well as working with the CAA on resolving disputes relating to air travel.

¹Airport accessibility report 2016/17

https://publicapps.caa.co.uk/docs/33/CAP1577_Airport_Accessibility_Report_FINAL.pdf

- The aviation sector welcomed the introduction of Gatwick Airport’s lanyard scheme ([the sunflower lanyard](#)) for passengers with hidden disabilities, which has been adopted across 12 UK airports. ABTA believes a similar scheme could be replicated across other modes of transport, improving accessibility beyond air travel. ABTA supports in principle the establishment of a national assistance card, but we would welcome further information on its functionality.

ABTA’s work on accessibility

Accessible flights and holidays have been an important sector of the travel market for many years requiring good customer service from ABTA Members.

ABTA has taken a leadership position in raising awareness and making it easier for Persons with Reduced Mobility (PRMs) to travel. Following the implementation in July 2008 of Regulation 1107/2006 concerning the rights of PRMs travelling by air, ABTA convened an industry group comprising the Civil Aviation Authority (CAA), Department for Transport (DfT), Equality & Human Rights Commission (EHRC), airlines, airports, ground handlers, tour operators, travel agents and an independent disability representative. In July 2012 the ABTA/CAA guidelines on pre-notification were published to supplement the Department for Transport Access to Air Travel Code of Practice, which was published to implement Regulation 1107/2006. The guidance aims to support all involved in the provision of air services in providing a comprehensive service to their customers, including encouraging them to identify any specific assistance needs when making a booking.

In 2014, ABTA updated its guidance to further help ABTA Members enable disabled and less mobile passengers to get the most out of their travel and holiday arrangements. The guidance includes a booking checklist, practical guidance on each part of the passengers’ journey and companies’ legal obligations, plus free online training for ABTA Members such as the Accessible Travel seminar held in April 2017. It aims to be a one-stop-shop for all Members looking for clarity on their obligations, and for practical support in improving their customers’ travel experience.

ABTA also works directly with airports and airlines and has been involved in airport planning issues on which passengers, including PRMs, are consulted. Airports’ websites now show useful information and services available to PRMs, including the availability of assistance services and information on distances within airport terminals to the gate, amongst other items.

Consultation Questions and Actions

Consistency in Accessing Transport Services

- 2. As a passenger or an organisation representing disabled people, what is your experience of information and guidance setting out the rights of disabled persons or those with reduced mobility when travelling by air?**

We have listed some questions below which you may find helpful in responding. However, the list is not exhaustive and you should not feel restricted to the themes below.

- **Is there enough information available regarding your rights as a disabled or less mobile passenger when travelling by air?**
- **Is the existing information and guidance clear and understandable, or is it too technical? For example, could the wording be improved? If so, how?**
- **Are there any particular areas where you feel there is too little information available?**
- **Is the existing information focused on certain areas while leaving gaps in others, or is there a balance?**
- **Is the existing information easy to access/find? If not, what could be done to make the information easier to access?**

- **In your opinion, which organisation (e.g. the Government, a consumer rights advocacy, a disability organisation, etc.) would be most appropriate to provide information and guidance in this area? Why?**

ABTA provides Members with support and practical guidance to enable disabled and less mobile passengers to get the most out of their travel and holiday arrangements. This includes a booking checklist, practical guides on each part of the passengers' journey and companies' legal obligations, plus free online training for ABTA Members. It aims to be a one-stop-shop for all Members looking for clarity on their obligations, and for practical support in improving their customers' travel experience. ABTA's practical guidance includes the need to ensure there is clear information on the rights of disabled persons or those with reduced mobility, as well as the information customers will need to know at every stage of the holiday journey, from travelling to the outbound airport, the UK point of departure, when on board to arrival in destination.

ABTA's Code of Conduct for Members includes the following requirements:-

1H – Ensure that, in accordance with the Equality Act 2010, they

- make reasonable adjustments to the way they deliver their services so that disabled people can use them, and
- take reasonable steps to tackle physical features of premises that prevent, or make it unreasonably difficult for, disabled people to access their services

In addition, ABTA's Standards on Brochures and Websites (which form part of the Code) remind Members of their obligations to make reasonable adjustments, which may include providing large print brochure descriptions or a facility for websites to be viewed in text-only form.

ABTA Members are also encouraged to offer easy access to special assistance by prominently featuring the section concerning passenger assistance on their websites/brochures and provision of special assistance telephone line. Once they have been given the necessary information, the onus is on the agent/operator to pass that information to the transport and accommodation providers.

3. As an industry representative or a service provider in the aviation sector, what is your experience of guidance regarding your obligations when providing services to disabled persons or those with reduced mobility when travelling by air?

We have listed some questions below which you may find helpful in responding. However, the list is not exhaustive and you should not feel restricted to the themes below.

- **Based on the existing guidance, do you know what is expected of you when providing services to disabled persons and persons with reduced mobility?**
- **Is the guidance detailed enough? Is there enough information available?**
- **Is the existing information easy to access/find? If not, what could be done to make the information easier to access?**
- **What could be added to the guidance to make it easier for you to provide services to disabled persons and persons with reduced mobility?**
- **Are there any specific areas that you feel are not adequately covered in the existing guidance? Are there any areas that you feel the existing guidance is placing too much emphasis on?**

ABTA has no comment to make as this question directly relates to aviation service providers.

Action 8

Under the “Consistency in Accessing Transport Services” section, ABTA would like to comment on Government Action 8: “to continue to roll-out station access improvements for which funding has been allocated, and deliver the Access for All programme in full, building on the significant progress that the programme has already made. We will continue to seek to extend the Access for All programme further in the future.”

ABTA believes that effective, efficient, high quality and resilient surface transport to airports benefits not just air passengers and airport staff but also the local population, and is an integral part of the sustainable growth of any airport. It is an important aspect of the passenger experience and is instrumental in the choice of a passenger’s departure airport. A modern integrated transport system can offer greater accessibility for PRMs and for those with hidden disabilities, a growing percentage of the population, as well as easing surface transport disruptions for the local population near transport hubs.

Training and education

6. What additional action could Government, regulators or transport bodies take to ensure that transport providers and staff have a better understanding and awareness of the access and information needs and requirements of passengers or transport users with less visible disabilities (i.e. those with sensory or cognitive impairments including dementia, autism or mental health conditions)?

ABTA would call for services for people with hidden disabilities to be better promoted, informing what assistance is available, particularly as passengers are more reluctant to disclose that they need help. As noted below in response to question 14, a national assistance card, wristband or other discreet identifier could provide a solution and allow airports and airlines to know what assistance can be provided. It would also allow for a joined up approach so that there is a recognised symbol such as that for wheelchair users.

Spontaneous travel

9. As a transport operator or provider, what is your experience of enabling spontaneous travel for disabled people?

- **What steps have you taken to enable spontaneous travel for disabled passengers?**
- **What action could Government, regulators or other bodies take to help support you to provide spontaneous travel for disabled passengers?**

ABTA cannot comment from the perspective of a transport operator or provider. However, in the aviation sector, airports and airlines have invested heavily in facilities and PRM services at UK airports to ensure greater accessibility for people with disability and those with reduced mobility – 21% of the population². We recognise that it is important that sufficient communications are in place to ensure consistency in the services provided to every customers by different service providers.

ABTA agrees that transport providers should have systems in place to facilitate spontaneous travel by disabled passengers or PRMs. However, where travel is booked in advance, as is usually the case for air travel, there are clear benefits to passengers in pre-notifying the carrier of any assistance

² Department for Work and Pensions. Family Resources Survey 2015/16, P7:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/600465/family-resources-survey-2015-16.pdf

requirements at the time of booking. Air passengers should advise the agent or transport provider of the nature of their disability and associated requirements, at least 48 hours in advance of travel if not at the point of sale. As part of our work, ABTA has recommended that priority is given to passengers who have pre-notified.

Building confidence and empowerment

12. We would welcome views, particularly from disabled passengers, on the current systems for resolving transport disputes, and whether processes could be further improved.

ABTA believes the current systems for resolving disputes, as relates to aviation, works. The CAA is the National Enforcement Body (NEB) for the regulations relating to air travel and is responsible for protecting air passengers' rights.

ABTA has been instrumental in standardising complaint handling at a European level for customers including PRMs. This includes the development of a template for capturing complaints from PRMs, and guidance for NEBs. It ensures consistency in the way complaints are handled, and in the way data is gathered, analysed and used to seek improvement in the passenger experience. We would urge the Government to ensure NEBs continue to communicate effectively in a post-Brexit and handle complaints in a consistent way across the EU.

ABTA also works closely with tour operator and travel agent Members and has a number of seminars throughout the year on complaint handling and accessible travel³ to make Members aware of their obligations. Our website offers general advice to all travellers whether booked through an ABTA Member or not on the best procedure to follow if there is a complaint. Customers of ABTA Members with a complaint against the Member can access ABTA's ADR and arbitration schemes. Customers of [some airlines and airports](#) also have access to ADR schemes for complaints about problems faced by passengers with reduced mobility when using air transport services.

14. As a transport operator or provider, we are keen to receive your views on the desirability and feasibility of introducing a national assistance card.

We have listed some questions below which you might find helpful in responding. However, the questions below are not exhaustive and you should not feel restricted by them:

- **Do you currently offer an assistance card, badge, lanyard or other tool to enable passengers with hidden disabilities to alert your staff to assistance needs?**
- **Do you have any views on the merit or not of introducing a national, crossmodal assistance card?**
- **Are there any practical or other considerations needed for the introduction of a cross-modal national assistance card?**

The industry welcomed the launch of Gatwick Airport's voluntary lanyard for passengers with hidden disabilities. The lanyard allows staff to discreetly offer additional support where this may be required. It ensures staff are made aware that a passenger may need more time at security, to have a family member with them at all time or require staff to use very clear verbal language. The role of training for security staff is vital for delivering this scheme.

The lanyard is part of a wider initiative by OCS Group and since its launch, more than 8,000 lanyards have been issued, with the scheme being rolled out across 12 UK airports, including Aberdeen and

³ABTA Conference and Events - Accessible Travel Seminar, London:
https://abta.com/assets/uploads/general/Accessible_Travel_final_agenda_-_April.pdf

Bristol. The CAA published guidance in December 2016⁴ on assisting passengers with hidden disabilities, recommending that people with disabilities have the option of wearing a lanyard, bracelet, or other suitably designed aid provided by the airport to ensure they are easily identified by staff and can get the assistance they need.

ABTA believes a national assistance card that provides similar benefits to the lanyard scheme may be feasible, and would create a consistent, recognised approach. We would welcome additional information on how a national assistance card would work in practice. Would passengers be required to have the card with them at all time so that it is visible to staff? How would a passenger go about obtaining such card and would they be required to prove their disabilities in order to qualify?

Thank you for considering our response. We would be happy to provide further information on any of the points raised. Please do get in touch using the contact details listed below.

Further information

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⁴ CAA guidance for airports on providing assistance to people with hidden disabilities:
<http://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=7390>