

# Accessible Air Travel Workshop

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# Accessible Air Travel Workshop

September 2010

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CPG, CAA House, 45-59 Kingsway, London WC2B 6TE

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# Introduction

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During 2009 the Civil Aviation Authority (CAA) reviewed how the European legislation<sup>1</sup> providing rights of access to air travel for disabled people and people with reduced mobility (PRMs) had been implemented in the UK. The report was based on responses from a range of stakeholders setting out their views on how the legislation was working for PRMs and for industry. Our report identified a number of areas that we wanted to discuss with stakeholders before beginning to develop best practice.

The CAA Accessible Air Transport Workshop was held on 24 May at the Coin Street Neighbourhood Centre (the Agenda is at Annex A). Representatives from 23 stakeholders attended (see Annex B), including those from disability groups, airlines, airports, tour operators, travel agents and organisations providing the service at the airport. The Workshop was interactive and following introductory talks by both CAA and external speakers, the attendees were split into four discussion groups. In each group there was a facilitator, from SHM Productions Ltd, to ensure ideas were captured and all participants were able to contribute.

The workshop was split into three separate sessions:

- Consumer Awareness
- Pre-notification
- Service quality at the airport

This report sets out the key issues that were discussed and identifies a number of ideas that the CAA plans to take forward with stakeholders.

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1. EC Regulation 1107 on the rights of disabled persons and persons with reduced mobility.

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## Session 1 Consumer Awareness

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The intention of this session was to identify which groups of people need to be aware of PRMs' rights and responsibilities, the level of detail and understanding these different groups should have, and how and when that information might best be presented.

### Who needs to be aware of the PRM legislation

This session considered who needs to be aware of the consumer rights set out in the PRM legislation. The following list is not exhaustive, but captures the key groups that were discussed:

- people with reduced mobility;
- accompanying family and friends;
- travel industry;
- PRM organisations;
- government departments (DfT, DEFRA, UKBA);
- CAA;
- EHRC/CCNI;
- health professionals.

### What people need to know

The session concluded that PRMs and the travel industry need to have a basic level of understanding of the rights set out in the PRM legislation. This should include information on the level of service that should be expected. It was also felt important that PRMs had an awareness of what was in and out of scope. This was seen as particularly important in relation to the seats that cannot be allocated to PRMs on board the aircraft due to safety limitations, as this caused considerable confusion. PRMs need to be aware of their responsibility to inform their travel provider, in advance, of the assistance they needed at the airport.

Enabling PRMs to find out more about their journey would allow them to make informed choices about the level of assistance necessary. Providing signposts to information about the airport layout, walking distances, facilities available and the first point of access at the airport would assist PRMs in making choices. DPTAC<sup>2</sup> is also developing a list of assistive devices that PRMs may wish to check-in or take on-board the aircraft. They will be working with the CAA and industry to consider any practical or safety issues that may be relevant and will consider producing guidance.

The groups also felt it was important that PRMs know how to make a complaint if something goes wrong and how to obtain assistance from the EHRC/CCNI<sup>3</sup> if they are unhappy with the service provider's response.

### Raising awareness

The session generated a number of ideas on how to raise the level of consumer awareness. Many are simple ideas that are already being used successfully, though not universally. We will be working with representatives from the travel industry and disability groups to consider how some of these ideas could be taken forward to improve consumer awareness.

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2. Disabled Persons Transport Advisory Committee

3. Equality and Human Rights Commission and the Consumer Council for Northern Ireland.

## Communication

We have met with DPTAC representatives and they have agreed to assist us in developing a framework to improve access to clear, consistent information (including how to complain) in accessible formats. This will include working with:

- disability and consumer groups about providing information on their websites, articles in their magazines or access to leaflets setting out consumer rights;
- airlines about including information on consumer rights in airline in-flight magazines to encourage passengers to pre-notify when they next book a flight; and
- airports about providing information to passengers at the airport through posters and leaflets.

## Seating Allocation

It was felt that guidance on the safety rules and how they affect the seats allocated to PRMs would be very helpful and would be of benefit to PRMs and the travel industry. Janice Fisher, CAA Manager Cabin Safety has produced the guidance at Annex B that explains why PRMs are unable to be allocated seats in certain parts of the aircraft. If you require any further advice, please contact the Cabin Safety Office at [focabinsafety@caa.co.uk](mailto:focabinsafety@caa.co.uk)

## Airport Information

Many airports publish information about their layout and facilities, but it can sometimes be difficult for PRMs to access this information. The ideas generated included providing signposts to PRMs at the booking stage so that they could research their journey and make an informed decision about the assistance they required. We intend to progress this project with the ABTA Group,<sup>4</sup> as this impacts on the booking process.

## Industry Awareness

All participants felt that Industry awareness was important and that training for front-line staff should include basic disability and equality awareness as well as on passenger rights. It was suggested that there should be focal points within each organisation that have a more detailed knowledge of the legislation so that staff know where they can find more information.

There is scope to use e-learning tools to ensure front line staff have a good understanding of the passenger rights set out in the PRM legislation. ABTA and the EHRC have produced a free on-line training programme aimed at front line travel staff. The training course can be found at:

[www.accessibletravelmadeeasy.com](http://www.accessibletravelmadeeasy.com)

There may be opportunities to develop further on-line training courses and organisations representing airports may wish to consider this type of training.

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4. Stakeholder group chaired by ABTA to discuss how to improve the pre-notification process.

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## Session 2 Pre-notification

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The intention of this session was to highlight some of the key challenges to the system of pre-notification from all the different stakeholders and then to consider how to improve the pre-notification system.

A number of ideas were suggested to improve the pre-notification system and increase the number of consumers pre-notifying. We have discussed the proposals with ABTA who have agreed to provide a regular slot on their PRM Group to develop the ideas into best practice guidelines.

### Booking process

Stakeholders felt that on-line and telephone bookings were already quite complicated and the number of variables was increasing all the time (e.g. how you can book and check in). Adding the PRM notification into this process could make it longer and even more off-putting for PRMs. It was also noted that it could be difficult, as staff may lack confidence to ask sensitive questions in a busy travel agency environment. Training for booking agents was seen as important to ensure standard questions about assistance needs were asked as part of every booking.

There were also concerns about providing information repeatedly, as each time a PRM makes a booking they are required to provide detailed information on their assistance needs. Discussions also considered the cost to PRMs of telephone calls to pre-notify and there was general agreement that however PRMs choose to make their booking it should be free of charge.

It was agreed that the booking process was the best opportunity to encourage passengers to pre-notify. There were a number of ideas to make this process as easy as possible and to enable PRMs to make better choices about their journey. We will be working with stakeholders to develop best practice for the information to be provided during the booking process. This will include the following:

- a clear, consistent message about consumer rights and responsibilities;
- ensuring that there are a number of prompts to tease out whether there are any assistance requirements (e.g. use of reminders such as requests for Advance Passenger Information (API) and when tour operators send out tickets);
- developing a format for explaining how assistance needs are recorded (based on the IATA codes, using symbols and clear language) to ensure that PRMs can validate that the operator has recorded their requirements accurately;
- providing access to information about their journey, e.g. signposts to airport websites where they can find information on walking distances and facilities;
- considering the benefits of developing a coding system for airports, based on their size, to assist PRMs in making decisions about their assistance needs;
- considering whether it is possible to provide PRMs with the ability to check that their arrangements are in place.

Capturing assistance needs within airline frequent flyer schemes could also make the booking process easier for PRMs, and ensure that they did not have to continually provide the same information. We will explore this with a range of airlines.

## **IATA Codes**

There was some confusion around the IATA codes assigned to passengers to identify the type of assistance required. Concerns were raised that the codes did not support differentiation of mobility and necessary assistance and did not capture important information. Airlines noted that the “Meet and Assist” code was no longer in place and this caused a number of problems. This code covered older people who may need assistance to walk through the airport, but did not require a wheelchair. This was not accurately described by other existing codes. Industry representatives also noted some instances of the PRM service being abused to progress through the airport more quickly.

Providing further guidance for industry on the IATA codes may assist in ensuring PRMs receive appropriate assistance at the airport. The CAA will seek further clarification from IATA on the available codes before considering possible guidance.

## **Written confirmation**

PRMs are not routinely provided with a written confirmation that their assistance request has been recorded and passed on. This causes uncertainty for PRMs, as they have no way of demonstrating to staff at the airport that they have pre-notified.

Stakeholders considered that it would be helpful to provide confirmation to PRMs that the requested assistance had been booked. This could be included on airline tickets, boarding cards and tour operator invoices. It was also suggested that providing information on where to go at the airport would also be helpful as there is currently some confusion. The CAA will discuss with IATA the possibility of including assistance requirements on airline documentation.

## **Transfer of Information**

There were concerns that the systems for transferring information did not always work well. Information had to go through a number of stages, sometimes being passed from a travel agent to an airline and then onto the airport. The differing systems in place at various stages made it difficult to ensure information was transferred accurately.

It was agreed that capturing and transferring information as efficiently as possible was important, as it fed into many decision making processes, including staff resourcing and use of equipment. Tour operators and travel agents considered there should be clear guidance from airlines about the information they required.

The CAA will seek further details from IATA on the current airline systems available and will be seeking information from the Top 6 UK airports on how the system is working in practice.

## **Lack of incentive to pre-notify**

The PRM Regulations guarantee assistance for passengers that pre-notify and requires operators to make reasonable efforts to assist those who have not pre-notified. Stakeholders did not consider there was a clear incentive for PRMs to pre-notify as it did not guarantee a better service and those who had not pre-notified often received the same or, sometimes, even a better service.

Service providers noted that it was not always possible to call the names of pre-booked passengers in the waiting areas. This could lead to awkward situations, such as calling for passengers from a particular airline and taking passengers who had not pre-notified ahead of those who had.

There was general agreement that passengers who pre-notify should be prioritised and that airport service level agreements (SLAs) should reflect shorter waiting times. Ensuring that passengers are called by name could be one way of ensuring that those who have pre-notified receive the service in the required timescale and encouraging PRMs to pre-notify on their next journey.

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## Session 3 Service Quality at the Airport

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The purpose of this session was to identify issues that affect the customer journey through the various stages of the airport experience, and to explore how the system might be improved.

### Main airport service quality issues

- Designated points of arrival
- Development of service standards
- Taking into account needs of passengers with varying disabilities (including visually impaired and deaf and hard of hearing)
- Provision of information to passengers
- Training
- Baggage
- Leaving PRMs unattended
- Complaints process

### Arrival at the airport

Stakeholders thought that the approach to the airport could often be complicated and that passengers could be unsure where to go and how to obtain assistance. Assistance needs to be available from all points of arrival, including car parks (both short-stay and long-stay), bus stops, and railway stations, as well as at the entrance to the terminal. A blind participant said that there should be a tactile indication that would enable blind or visually impaired passengers to locate designated points of arrival.

Participants identified problems with some car parks: too few disabled spaces, disabled spaces without access to pedestrian walkways and height restrictions that could be a problem for special vehicles.

Stakeholders thought that there should be seats, shelters and proper wheelchair spaces at designated points of arrival, so that PRMs were not exposed to the elements while waiting for assistance.

Some stakeholders thought that PRMs should be able to indicate their imminent arrival at the airport. Suggested ways of doing this were a text number that PRMs could use when they were close to the airport, and a button that PRMs could press at the entrance to a car park. Another suggestion was that PRMs who had pre-notified and announced their imminent arrival by text message should be able to use a reserved area for drop-off and parking. Number plate recognition could be used to make this work.

One airport thought that all PRMs requiring assistance, including those who did not need help until later in the airport journey, should notify the airport of their arrival at the airport. This would enable airports to allocate resources more effectively.

Other issues identified included the need for assistance with luggage, revolving doors which were a problem for wheelchairs, inadequate information on airport websites about parking and the location of help points, the need for functioning and well-maintained induction loop systems, and having a clear schedule which would reassure PRMs that there is a plan to make their journey smooth.

## **Assistance Desk**

Stakeholders said that PRMs were often confused over whether to go first to the assistance desk or check-in. A suggested solution was to clarify that PRMs should always go to the assistance desk first. An airport said that having the PRM register first at the assistance desk would allow airport staff to plan their resources.

Stakeholders also said that assistance desks could sometimes be difficult to locate. One participant mentioned that some were hidden out of the way at the back of the landside area. Often prime sites were given to retail operations instead. One participant also said that signage could be off-putting and patronising, and that an internationally recognised standard should be used.

Stakeholders said that desks were not always manned and were sometimes not fit for purpose. For example, it was not routine to have an induction loop system for people with hearing impairments. Suggestions for improving desks included providing flight information and making seating visible, comfortable and in sight of a constant staff presence.

Airports said that special assistance desks were often inundated with general customer service inquiries that should be providing assistance to PRMs. Participants suggested that the purpose of the special assistance desk should be made clear to the public.

Other comments were that passengers arriving late: risked missing their flight by going first to the special assistance desk instead of check-in; that staff were not always competent to deal with certain disabilities, such as facial disfigurement; and that PRMs should be made aware of who was responsible for their journey through the airport and how to make complaints if something went wrong.

## **Check-In**

Some stakeholders mentioned that queues at check-in desks could be long, and that there was a lack of appropriate seating for PRMs. PRMs also did not know which queue to join and their disability could make it difficult for them to find out. A blind participant mentioned that the soft physical barriers used for check-in queues were very difficult for those using a cane or guide dogs to recognise and negotiate.

Airports said that their PRM assistance staff could be delayed by having to wait in check-in queues, and supported allowing PRMs to go to the front of the queue.

Some stakeholders thought that some check-in desks were inaccessible, with some lacking induction loop systems for the deaf and hard of hearing. Possible solutions included accessible self-service kiosks and dedicated desks for PRMs.

Some stakeholders mentioned problems that check-in staff were sometimes unaware of pre-notified assistance requests, and of PRM requirements and equipment such as suitable seating and portable oxygen concentrators. Some staff were also unaware of how long it could take to check-in wheelchairs. Stakeholders thought that the most appropriate staff should be available at check-in desks, and stressed the need for suitable training, including refresher training, so that PRMs could be confident that staff were competent to plan the rest of the PRM's journey. Favourable mention was made of the training of airport staff in Scandinavia.

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## Security

Stakeholders said that security staff could on occasion be unsympathetic and lacked awareness of issues that PRMs face. This could lead to inflexible attitudes, such as confiscated medication that airlines had agreed passengers could carry, refusal to allow an empty water bottle through, which would later on be used to provide water for a guide dog, and inappropriate questions.

Visually impaired PRMs could also be treated inappropriately, for example being separated from their dog or cane.

Stakeholders also mentioned that there was often inadequate equipment to allow PRMs through security without having to leave behind equipment, such as wheelchairs.

Stakeholders suggested that security staff required specialised training to deal with PRM needs, including hidden needs such as deafness, and that adequate equipment should be provided to allow PRMs to be searched and scanned without being manhandled. Another suggestion was that pre-notified PRMs should be taken through a dedicated security area.

Airports mentioned that some passengers abused the system by taking too much hand luggage and that too many family members wanted to accompany PRMs to avoid queuing. Airports also said that space and seating constraints were a big challenge for them.

## Departure Lounge

Some PRMs reported that they felt abandoned in PRM areas in the departure lounge, and were worried that they might miss their flights. They required reassurance that assistance would be provided, and wanted to be able to see flight information screens. The need for announcements for the visually impaired and contingency arrangements for the deaf and hard of hearing if information screens were not available, were also mentioned.

Airports said that PRMs could be hard to locate as they could be visiting the shops or toilets, and that it was hard to allocate staff when PRMs were spread over a wide area.

Possible solutions included pagers or call buttons for PRMs to communicate with staff, dedicated areas for PRMs to wait with their families, clearly identifying an airport worker with responsibility to ensure that PRMs made their flights, and an aspiration for a dedicated PRM lounge with designated seating, a reception desk, and access to shops and restaurants.

## Boarding

Participants identified concerns about uncertainty over where legal liability for safety lies, and the need for robust contingency plans and clarity over whether it would be appropriate to lift and carry a PRM if equipment broke down.

Some staff lacked training on how to use specialist equipment, such as ambulifts and hoists, and there was a lack of clarity over the point at which a PRM should transfer from their own wheelchair to allow it to be loaded.

Airports and service providers mentioned that the quick turn around time of some airlines made it difficult to embark and unload PRMs, and that they had to balance the cost of investment against the limited demand for specialist equipment.

Stakeholders also mentioned that it could be embarrassing for PRMs to be loaded last, and that airline armrests could not always be raised, making transfers to seats difficult.

Possible solutions included encouraging innovation in developing new procedures and equipment, allowing passengers to remain in their own wheelchairs for as long as possible, organising an internal terminal transport system that allowed several PRMs to be collected and transported collectively rather than individually, in-depth training for handlers, producing a service-wide training manual with detailed information about handling, seating PRMs near doors, and input to wheelchair design to encourage weight to be thought through and easy procedures to isolate batteries.

### **In-flight**

Participants identified a number of issues onboard the aircraft. These included: the willingness and ability of crew to assist PRMs (including stowing and retrieving baggage, the use of oxygen, and assistance to get to the toilet), that passenger call buttons were not always responded to, sometimes an onboard wheelchair was required for PRMs to get to the toilet, and toilets were not always suitable for PRMs. A number of specific issues were identified in respect of the visually impaired and the deaf and hard of hearing. These were: to have available sign language or braille for safety announcements and information, the adequacy of legislation on assistance dogs, and the lack of subtitles for in-flight entertainment. Possible solutions were to use pre-notification to inform cabin crew that assistance would be required (including the need for an onboard wheelchair) and for crew to check PRMs at regular intervals during the flight.

### **Disembarkation**

Stakeholders mentioned that PRMs sometimes had to wait so long before they were disembarked that they missed transfer buses which had gone before the PRM arrived. Airlines mentioned that problems in disembarking PRMs could have a knock-on effect that delayed the next flight. Participants suggested that PRMs should be seated in an appropriate place in the aircraft to allow a smooth and speedy disembarkation.

Another issue raised by participants was that more passengers might request assistance on disembarkation than had required assistance on boarding.

### **Immigration**

Stakeholders said that immigration desks could be inaccessibly high, with limited buggy access and no appropriate seating in queues. Participants also identified service issues, such as assistance dogs not being allowed through, no assistance available to assist PRMs completing landing cards, lack of clarity over who was responsible for assisting PRMs through immigration, and a general lack of customer care.

Participants suggested that at least one lower level desk should be provided.

## **Baggage Reclaim**

Participants said that PRMs had experienced some problems with baggage reclaim, including baggage containing vital equipment being lost or damaged, delayed baggage that meant that specially booked onward travel was missed, uncertainty of where to go to reclaim wheelchairs, and wheelchairs not being processed with other baggage, leading to two collection points for PRMs.

Practical problems were also mentioned, including PRMs having difficulty with lifting luggage off carousels and the lack of dedicated places to sit after the flight. It was also noted that there were instances of one person providing assistance to a PRM in a wheelchair at the same time as transporting their luggage. There were concerns over the safety of both the PRM and the service provider, particularly when dealing with larger pieces of luggage. Airports also mentioned that labour resources could be tied up in baggage halls, and a lack of clarity over responsibility for handling baggage post-flight.

Stakeholders suggested that a porter service could be provided, with one person being responsible for staying with the PRM until they are through the airport.

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# Conclusion

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## Next Steps

This report sets out the main areas of discussion at the workshop and identifies a number of work streams that the CAA intends to take forward throughout 2010 and early 2011. Many ideas were identified and we have had to focus on the areas we think will deliver most benefit using the resources available to us. Some attendees also raised concerns about oversight of safety audits for equipment used to assist PRMs in boarding the aircraft. These issues have been referred to the CAA's Aerodrome Standards Department and are being considered separately to this report.

A number of workshop attendees volunteered to participate in specific projects and we will be working with them to develop identified projects. Within the CAA, Jackie Knight will be managing the Consumer Awareness and Pre-notification work streams and James Mackay will be managing the work on Service Quality at the Airport.

The CAA will be consulting stakeholders on the outcome of these projects, and the resulting draft guidance, in Spring 2011.

## Consumer Awareness

The CAA will be working with DPTAC to develop a framework to improve access to information for consumers. This will include the information provided by disability groups, the travel industry and airports. The results of this work will be published in early 2011.

## Pre-notification

We will be reviewing information from the Top 6 UK airports on how the pre-notification process is working in practice. This will help to inform the need for guidance on the use of IATA codes and systems for transferring information.

The CAA will be working with the members of the ABTA PRM Group to develop best practice guidelines on the pre-notification process. The guidance is expected to cover the following areas:

- information to be included within the booking process;
- use of IATA codes;
- confirmation of assistance in travel documentation;
- increasing the incentive for PRMs to pre-notify.

## Service Quality at the Airport

The CAA has written to 30 airports to request detailed information on how they have approached providing assistance. This will feed into the development of guidance by the CAA. This project will consider guidance on the key issues airports should consider when:

- consulting with disability groups and airlines;
- setting service standards;
- procuring a third party to deliver the service.

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## **Annex A      Agenda**

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<b>09.00 – 09.30</b>	<b>Arrival and coffee</b>
09.30 – 09.45	Andrew Haines – CAA Chief Executive Introduction and background
09.45 – 10.00	Jackie Knight – CAA consumer Policy Structure of the day and objectives
10.00- 10.15	John Welsman – Guide Dogs Transport Policy Officer Consumer Awareness
10.15 – 11.15	Workshop 1 – Consumer Awareness Breakout into 4 workshop groups
11.15 – 11.30	Plenary feedback from workshops
<b>11.30 – 11.45</b>	<b>Break</b>
11.45 – 12.00	Janice Fisher – CAA Head of Cabin Safety Airline seat allocation
12.00 – 12.15	Keith Richards – DPTAC Chair International Working Group Pre-notification
12.15 – 13.15	Workshop 2 – Pre-notification Breakout into 4 workshop groups
13.15 – 13.30	Plenary feedback from workshops
<b>13.30 – 14.15</b>	<b>Lunch</b>
14.15 – 14.30	Marshall Beach - OCS Service quality at the airport
14.30 – 15.30	Workshop 3 – Service quality at the airport Breakout into 4 workshop groups
15.30 – 15.45	Plenary feedback from workshops
15.45 – 16.15	Jackie Knight – round up and next steps
<b>16.15</b>	<b>End</b>

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## Annex B Workshop Attendees

<p><b>ABTA</b> Susan Parsons</p> <p><b>Birmingham Airport</b> Jackie Baker</p> <p><b>British Lung Foundation</b> Karmjit Kaur Katherine Huntly</p> <p><b>Civil Aviation Authority</b> Helen Bennett Janice Fisher Rod Gander David Kendrick Jackie Knight James Mackay</p> <p><b>Consumer Council for Northern Ireland</b> Fiona Mark</p> <p><b>Department for Transport</b> Sabina Ali</p> <p><b>Disabled Persons Transport Advisory Committee</b> Keith Richards Alan Norton David Finnegan</p> <p><b>easyJet</b> Simon Prower Catherine Read</p> <p><b>Equality and Human Rights Commission</b> Mark Stone Lesley Mountain</p> <p><b>Flybe</b> Cari Bottois</p> <p><b>G4S</b> Wayne Tomlinson</p>	<p><b>Gatwick Airport</b> Rob Erskine</p> <p><b>Guide Dogs for the Blind</b> John Welsman</p> <p><b>Heathrow Airport</b> Jayne Sharp</p> <p><b>Highlands &amp; Islands Airports</b> Tim Smith</p> <p><b>Loganair</b> Jonathan Hinkles</p> <p><b>Monarch</b> Will Barton</p> <p><b>OCS</b> Antoinette Farrell-Jones Marshall Beach</p> <p><b>RNID</b> Laura Matthews</p> <p><b>Spinal Injuries Association</b> Daniel Burden</p> <p><b>TBI/Abertis Airports</b> Timothy Clark Margaret James</p> <p><b>Thomas Cook</b> Amy Kendall</p> <p><b>TUI</b> Simon Mayne Eddie Redfern Richard Samuel Phil White</p> <p><b>Virgin</b> Ally Shearer</p>
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## Annex C    Seat Allocation

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European aviation safety regulations state that passengers of reduced mobility (PRMs) shall not occupy seats where their presence could impede the crew in their duties, obstruct access to emergency equipment or impede the evacuation of the aircraft. They also state that PRMs should not be allocated seats which permit direct access to emergency exits. Direct access means a seat from which a passenger can proceed directly to the exit without entering an aisle or passing around an obstruction.

Airlines therefore have to comply with this legislation and ensure that PRMs are not allocated seats that would contravene these requirements. This requirement is also extended to children, pregnant and obese passengers, prisoners in custody and deportees.

Front row seats, whether at the front of the aircraft or at the front of a cabin may not be occupied by PRMs if there is no bulkhead or partition (including galleys and toilets) separating the seats from the emergency exit. In essence, if the exit can be seen from the seat and there is no need to step into the aisle or around an obstruction to reach the exit, then it may not be occupied by a PRM.

Seats located at overwing exits often have more legroom but again are not permitted to be occupied by PRMs. Passengers in these seats must be able bodied and prepared to assist in the event of an emergency situation.

Any other seats may be occupied by PRMs, but the individual airlines may allocate specific seats in order to comply with their own procedures based on their aircraft's cabin layout. Such seats will often be close to toilets and in rows where the aisle armrests lift up.

Bulkhead seats are often not utilised because their armrests are fixed as they accommodate the tray table, and the seats are narrower because of this. On some aircraft these seats have the facility to install an in-flight baby cot and may be reserved for passengers travelling with babies.

Some airlines may further restrict aisle seats adjacent to exits, even if there is a bulkhead installed, as they prefer such seats to be occupied by passengers capable of assisting in an emergency.

Also, the requirement that the seating of PRMs shall not impede the evacuation of the aircraft, often leads to airlines preferring PRMs to occupy window seats if they are not travelling with the adjacent passengers.

### **Assistance Dogs**

Passengers travelling with guide dogs should always check with their airline with regard to seat space. Testing carried out by the CAA with Guide Dogs for the Blind proved that larger dogs, such as retrievers or labradors, would require an extra seat to be provided to allow them enough space to lie down. Smaller dogs may not require this.

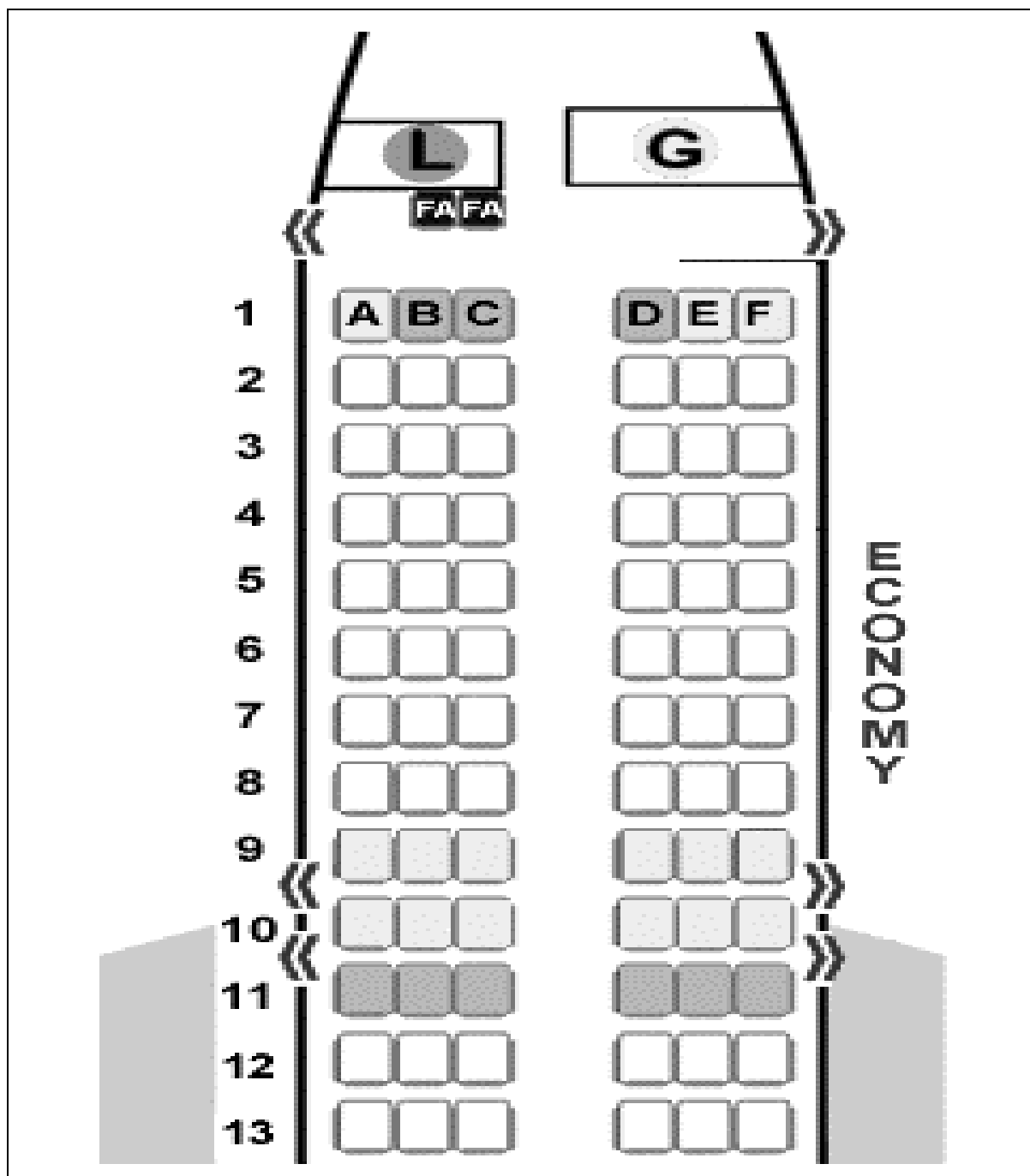
### **Aircraft Layout**

The following charts provide some examples of aircraft layout and identify the seats that may not be occupied by PRMs.

### Example of cabin layout on a single aisle aircraft

The following diagram details the seats that may not be occupied by PRMs on this section of aircraft. The exits at row 1 of this sample aircraft are floor level doors and would have a cabin crew member seated close by. The exits at rows 10 and 11 are overwing hatches designed to be operated by passengers in the event of an emergency.

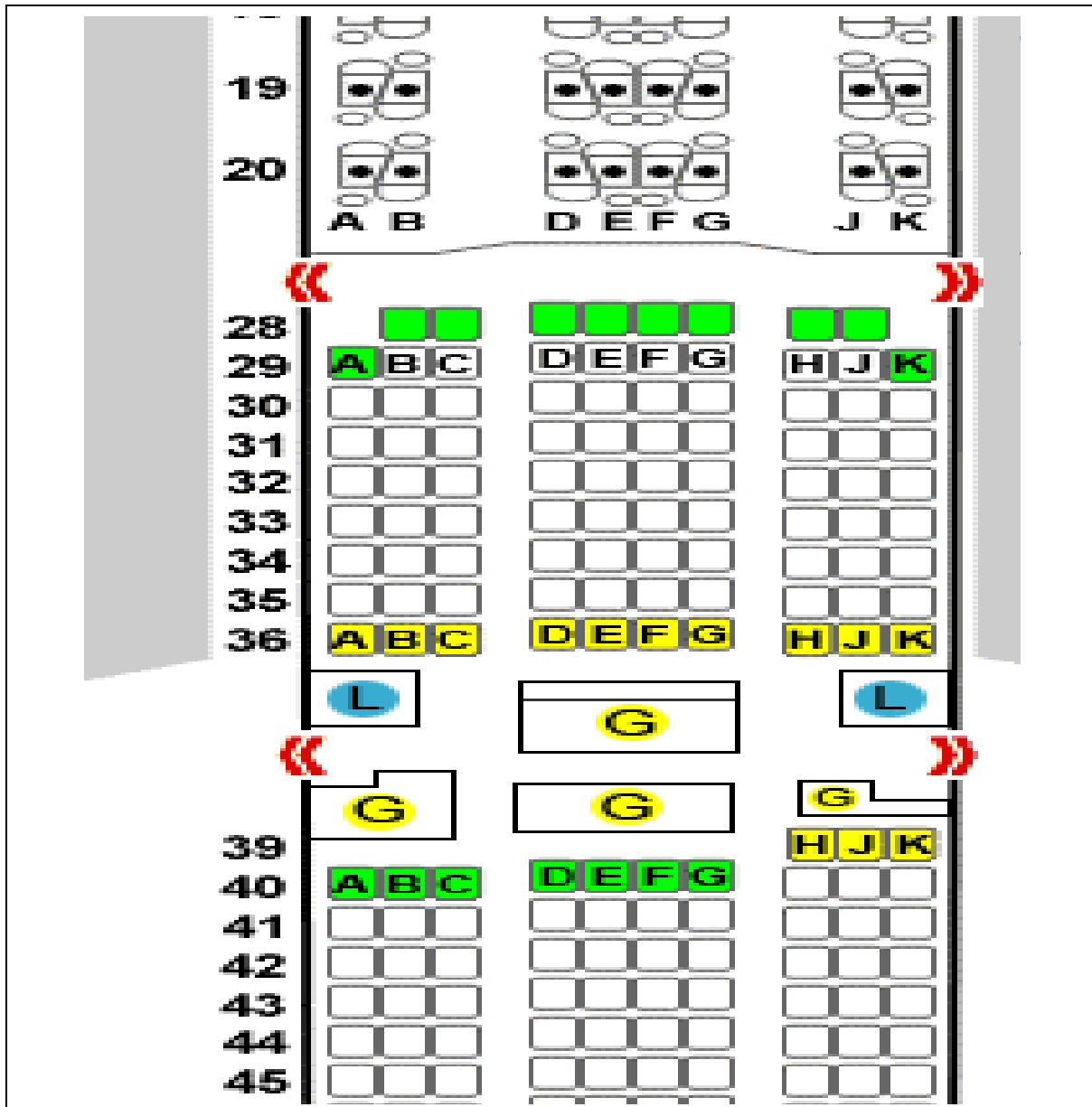
Row 1      A B C D  
 Row 10    A B C D E F  
 Row 11    A B C D E F



**Example of cabin layout on an aircraft with two aisles**

The following diagram details the seats that may not be occupied by PRMs on this section of aircraft. All exits shown are floor level doors.

- Row 28 B C D E F G H J
- Row 29 A K
- Row 40 A B C D E F H



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