



## UK Airport Consultative Committees - Liaison Group

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Iain Osborne  
Regulatory Policy Group  
CAA  
CAA House  
45-59 Kingsway  
LONDON WC2 6TE

29 June 2011

Dear Mr Osborne,

### **Passenger Representation and Complaint Handling**

The Liaison Group welcomes the opportunity to respond to your consultation document dated March 2011. The Liaison Group is made up of representatives of the Airport Consultative Committees at 23 of the UK's larger airports. Information about (ACCs) is to be found on our website at <http://www.ukaccs.info/role.htm>

At our Annual Meeting in Aberdeen on 9 June, member committees considered the consultation document. Our members greatly appreciated the attendance of Jackie Knight, Manager Consumer Policy, at our meeting to explain in more detail the work of the new RPG and the consultation proposals. The collective comments of the Liaison Group on those areas of the consultation where a consensus has been reached are given below. You will wish to note that individual committees have been encouraged to submit their own detailed comments on the consultation.

Overall the Liaison Group welcomes the opportunity to respond to the consultation and it believes that there are potential benefits of separating the complaints handling work from consumer advocacy. The Liaison Group therefore supports in principle the CAA's approach.

### **Aviation Consumer Advocate Panel (ACAP)**

#### ***Role and Scope***

The Liaison Group agrees that the proposed role and scope for ACAP broadly capture the areas which need to be taken into consideration. Member committees note that the CAA does not envisage ACAP having any public-facing role in campaigning on consumer issues and have therefore questioned whether this would prevent ACAP from having any "teeth"? Member committees strongly felt that ACAP should not only provide the consumer voice during the formulation of policy and the regulatory framework but also as part of the external governance structure ensuring that policy is applied correctly and appropriately and is achieving the desired

Aberdeen - Belfast City - Birmingham - Bristol - Cardiff Wales International - Durham Tees Valley - Edinburgh - Inverness - Glasgow - Glasgow Prestwick - Leeds Bradford - Liverpool John Lennon - London City - London Gatwick - London Heathrow - London Luton - London Stansted - Manchester - Newcastle - Nottingham East Midlands - Robin Hood Doncaster Sheffield - Southampton

result. ACAP needed to have a voice to be heard and listened to by a range of stakeholders as well as being a “critical friend” to the CAA. ACAP must therefore be able to approach third parties direct to feedback its views and recommend courses of action where needed.

Of key importance is the need to avoid duplication of effort in examining, monitoring/auditing passenger data and processes currently undertaken by airports/airlines and ACCs. There is a wealth of information and performance data already produced by airlines and airports locally which is often shared with a number of stakeholders including ACCs. The CAA/ACAP will therefore need to put in place effective processes and communication channels between all parties so as to minimise the potential for duplication in the production and gathering of data/information and to facilitate robust working partnerships. It is accepted that there may be instances where information does not already exist for specific areas which ACAP wishes to examine in more detail. It is therefore suggested that a central research fund be available to ACAP which the Liaison Group believes is important particularly where evidence based responses to Government/CAA consultations are needed.

Member committees also believe that ACAP and the CAA’s complaint handling must be able to embrace those areas of the passenger journey/experience where no legal protection exists.

### ***Membership and Recruitment***

The Liaison Group notes the need to keep the Panel membership small but the challenge will be to keep the Panel to 10-12 members. The value of having a representative from Northern Ireland Consumer Council in exchanging advice, experience and best practice is acknowledged as is the need to ensure the Panel comprises a broad range of passenger interests and expertise. Of particular importance is the need for the Panel to have access to a sound knowledge of the various processes and third party interaction at airports from a passenger’s perspective. ACCs have a good understanding and knowledge of the complexities of an airport’s operation, and the working relationship with the various agencies supplying goods and services. We believe therefore that the Liaison Group should be invited to nominate a representative to serve on the Panel. ACC representation would help build strong communication links between ACAP/ACCs and airports.

### **CAA Complaint Handling**

Currently complaint handling and resolution is the responsibility of airports/airlines but ACCs have a role in monitoring trends in complaints, the airport’s complaint handling process and its performance in handling complaints as well as the quality of response. Member committees believe strongly that passenger complaints should continue to be handled in first instance at local level (airport/airline) but acknowledged that there is a need to strengthen the complaint resolution process so that passengers are able to escalate unresolved complaints. The majority view is that the CAA was best placed to fulfill that role provided the active monitoring/auditing of complaints handling remained at the local level with ACCs. It is also important that ACCs’ current role in identifying trends in service provision is not diminished in any way.

In undertaking the complaint handling role, there is a need for the CAA to ensure that airports/airlines and ACCs are kept informed of any complaints it receives, of the outcome and whether any remedial action has been proposed as a result of the complaint. This is particularly important for ACCs as without such information and feedback there will be an impact on their auditing and monitoring work. ACCs can also help encourage airports to implement changes as a result of complaints. The Liaison Group therefore urges the CAA to put in place effective processes and communication channels between all parties to ensure this happens.

In respect of key performance indicators, the Liaison Group felt the proposed indicators rightly address complaints handling processes but is concerned that performance in terms of quality of responses or whether the consumer was happy with the outcome is not captured. The Liaison Group therefore suggests that the CAA gives consideration to its range of indicators so that they include qualitative indicators.

The Liaison Group hopes that you will take into account its views and looks forward to hearing from you on its suggestion that it should be invited to nominate a representative to serve on ACAP.

Yours sincerely,



Paula Street  
Liaison Group Secretariat

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