Pre-notification of PRM services at UK airports

What this paper is about

Provides an update on the CAA's work on services for PRMs at UK airports with a particular focus on pre-notification by passengers requiring special assistance at airports. It also informs delegates of the work of ABTA's PRM Group and the idea that priority should be given to PRMs who have pre-notified.

Points for Discussion

- Delegates are asked to share their experiences with PRM pre-notification at their airports and issues of concern or examples of best practice.
- Some member ACCs are concerned about the CAA's decision not to proceed with its pre-notification project at the present time. Is there a collective view about this decision in light of the other work being taken forward by the CAA and ABTA?
- Are delegates supportive of the ABTA Group's idea that priority should be given to PRMs who have pre-notified?
- Should the CAA be invited to next year's Annual Meeting to present the results of its first year's monitoring of PRM service quality standards?

Possible Action

- Issues of concern, ideas or examples of best practice that need to be highlighted to the CAA and/or ABTA's Group or member ACCs' own airports.
- A response be agreed to ABTA Group on its idea that priority should be given to PRMs who have pre-notified.
- CAA be invited to next year's Annual Meeting.

Introduction

1. At last year's Annual Meeting, the CAA gave an update on its review of PRM services at UK airports. The results of the review were very positive on the airport side although there were areas where improvements needed to be made such as visibility and accessibility of help points and the quality of the assistance provided, in particular waiting times, staff attitude and the quality of facilities, e.g. seating. In terms of service quality, delegates highlighted that pre-notification of passengers requiring assistance was an issue that impacted on the quality and efficiency of the service provided at airports. At that time the CAA reported that pre-notification rates had improved but it was felt that more needed to be done to inform and educate travellers and that the CAA planned to examine this in Autumn 2014.

2. Since that time, the CAA has subsequently decided not to proceed with the prenotification review project. The reason for this is because the research carried out in 2013 showed that nationally pre-notification rates had improved and were at about 70%, which the CAA concluded was an acceptable level as it compared positively to the EU, which has reported averages of 50-60%. The CAA has confirmed that pre-notification is still an important issue and it will continue to monitor levels and act as necessary.

3. In addition the CAA advised that it will do more to investigate the implications of a lack of pre-notification by giving airports further opportunities to demonstrate how non-notification affected their operations, and in turn, the interests of PRMs. The CAA continues to ask for information from airports on pre-notification levels on a yearly basis.

4. Some member ACCs are disappointed about the CAA's decision not to proceed with the pre-notification work and continue to be concerned about the pre-notification rates at their airports. They are anxious that more should be done with the airlines to improve the levels of pre-notification. It appears that the greatest problem is with inbound passengers who will have booked their journey outside the UK rather than those passengers travelling from the UK.

Current Work

5. James Fremantle, Consumer Enforcement Manager, CAA has provided an update on the CAA's current work and this is reproduced in Annex 1. Delegates will note that the CAA has advised that one of the likely main drivers for improving pre-notification rates in the future would be for airports to prioritise pre-notified PRMs as this would likely incentivise PRMs to pre-book. The CAA has provided a framework for this to be achieved but is looking to the industry to now take forward.

6. Delegates will also note that the CAA has undertaken a thorough overhaul of airline and airport websites to make sure that each has an assistance button/prompt no more than one click away from the home page. The CAA is closely monitoring this and will continue its work of informing and educating passengers. The CAA's own website provides concise information to passengers about what to do and what to expect on their journey:

http://www.caa.co.uk/default.aspx?catid=2800&pageid=16100 http://www.caa.co.uk/default.aspx?catid=2800&pageid=16085

7. The CAA also continues to be part of ABTA's PRM Group and will promote the ABTA/CAA "Pre-notification guidance" to the industry. The CAA is also contributing to the European Civil Aviation Conference's recent review of its "Guidance on Pre-notification" (Annex 5-H of ECAC Doc 30).

8. The CAA's work on raising quality standards has been positively received by airports and it is pleasing to note that airports now publish performance metrics which are also submitted

to the CAA. This is the first year of collecting the monitoring data and the CAA has indicated its willingness to share the results of the first year's monitoring with UKACCs at its Annual Meeting in 2016. It is suggested that the CAA be formally invited to next year's meeting to present the results of its monitoring.

ABTA's PRM Group and the work of ABTA

9. ABTA has been at the forefront of work on PRM pre-notification and has established a PRM Group comprising airports (Gatwick, Heathrow and Liverpool. Manchester and Stansted are on the mailing list), the AOA, airlines (scheduled, no-frills and charter), tour operators, travel agents, ground handlers, service providers (OCS is very involved as is Omniserv), disability representatives, the DfT and the CAA. ABTA's PRM Group next meets on 8 September 2015.

10. The ABTA Group is supportive of giving priority to those PRMs who have pre-notified. The Regulation states only "reasonable" efforts need to be made if not pre-notified and the ECAC recommendations referred to in EU Regulation 1107/2006 allows for different service levels for notified and non-notified passengers. The regulation also puts the onus on passengers requiring assistance to pre-notify a minimum of 48 hours in advance of departure. ABTA believes this is sensible and allows airports and airlines to plan and ensure that the necessary resources are available on board the aircraft and at all the airports in the passenger's journey. The industry has long championed the concept that PRM service providers should be required to prioritise pre-notified passengers. This would have a number of benefits not least an incentive on PRMs to pre-notify and a continuous improvement cycle. ABTA's concern is that if notified and pre-notified passengers are not prioritised then it is possible that it could lead to PRMs who currently pre-notify not bothering to do so in future.

11. It is understood that some airports have already adopted a tiered payment scheme for PRM services with airlines. ABTA believes that this acts as an incentive to airlines to encourage passengers to pre-notify their requirements.

12. ABTA has advised that agents/operators/airlines having a pre-notification box which must be completed at the time of booking is introducing unwelcome complexity to an already complex process. As web check-in becomes more and more prevalent days in advance, most airlines are asking the PRM question again at that stage of the journey. ABTA has done a lot of work on this with their member agents and operators who are expected to ask clients at the time they book whether they or anybody in their party will require assistance. ABTA has also advised that there is a lack of pre-notification amongst inbound passengers who booked their journey outside the UK.

13. Delegates will be interested to note that ABTA also has passenger information on its website relating to special assistance on what to do and expect:

http://abta.com/go-travel/before-you-travel/accessible-travel

14. ABTA would find it helpful if UKACCS could support the idea that priority should be given to PRMs who have pre-notified as this would have a positive impact and encourage PRMs to pre-notify in future. Delegates are asked to consider this request.

Paula Street UKACCs Secretariat

ANNEX 1



PRMs update

Pre-notification

Most UK airports provide us with data on levels of pre-notification at their own airports. The most recent data, for 2013, showed that nationally pre-notification rates were at an average of 70%, which compares positively to the EU, which has reported averages of 50-60%.

Through our "quality standards work" (see below) we have put in a performance monitoring framework which allows airports to set different performance targets to PRMs who pre-notify and those that do not. However, after speaking to a number of airports, our understanding is that most airports, for practical reasons, generally do not differentiate the level of service they provide. They consider that picking people out for a notably inferior service would create tensions between passengers and problems for their PRM staff. It would also be difficult to organise and would potentially make the operation less efficient for all.

The relative good showing in the UK compared to the rest of the EU, combined with the feedback we have had from airports, has led us to conclude that currently, as far as the passenger interest goes, there is not a significant benefit to PRM passengers to pre-notify and therefore there are not overriding reasons for CAA intervention.

We consider that one of the likely main drivers for improving pre-notification rates in the future would be for airports to prioritise pre-notified PRMs as this would likely incentivise PRMs to pre-book. We have provided a framework for this to be achieved but it is something industry must now take forward.

At a recent meeting of ABTA's "PRMs group" (attended by a number of airlines and airports), it was agreed that the group should work together to draw up a process on how to prioritise service for those who pre-notified in turn incentivising PRMs to do so. In addition, the CAA is hosting a "PRMs airport stakeholder" event in July and will be expecting airports to suggest areas for discussion where airports can share best practice. There is therefore ample opportunity for airports to discuss ways to improve pre-notification rates even further.

Improving the consistency of the quality of the airport PRM service

In line with obligations under Regulation EC1107/2006, airports with more than 150,000 passengers per year must publish quality standards, and monitor performance against these standards. In October 2014 we published guidance on how airports can meet their obligations - <u>http://www.caa.co.uk/docs/2824/Quality%20Standards%20Guidance.pdf</u>.

Surveys of PRMs indicate a high level of satisfaction with the assistance service at UK airports. However, information gathered from passenger complaints indicates that the service can, on occasion, go badly wrong. Our work on quality standards sets up a

framework by which we can ensure, on an ongoing basis, a consistently high quality of service to PRMs at UK airports. The key requirements are to

- set timeframes for providing assistance ECAC guidance (referred to in PRM Regulation) provides recommended targets for airports for providing assistance to passengers both on departure and arrival
- publish, and submit to the CAA, data on performance against targets twice yearly
- publicise and promote a CAA PRM satisfaction survey
- consult with disability groups on designing the PRM service

There has been an overwhelmingly positive response from airports to this work. All applicable airports now publish performance metrics and have committed to submitting data to us. All airports also promote the CAA survey. In addition, progress has been made in consultation with airport disability organisations, with many airports contracting charities to audit user experience, setting up 'user forums' containing regular flyers / disability organisations and convening regular meetings with key local disability groups.

We are planning a public report for early 2016 on individual airport performance.

Improving information for PRMs

The Civil Aviation Act 2012 gave the CAA new duties in relation to publishing information to assist consumers in comparing services and facilities. In August 2014 the CAA instructed all UK airports and the top 50 airlines (by UK passenger numbers) to publish specified information for PRMs 'one click' away from the home page of their website.

We received a positive, constructive response from both airlines and airports. A number of businesses have used the opportunity to enhance information provision above and beyond that which we required. This includes online "booklets" and videos on the "PRM airport journey".

The CAA is to set up a page on its website providing up-to-date links to airline and airport "PRM pages". This will be primarily a resource for travel agents to access (ABTA have agreed to promote) but we plan to publicise it through disability organisations so it also reaches PRM passengers direct.

Future PRMs work

Consolidating quality standards work

Our priority for airports should be to continue to build on the work we have done already on quality standards. We have put in place a solid foundation on airport assistance performance and we are now entering a monitoring and, as required, improvement phase.

Encouraging PRMs to travel by air

Over the past few years, the CAA has concentrated its efforts into ensuring solid foundations are put in place so that industry provides a consistently good service to PRMs. Evidence now points to this bearing fruit, with a consistently high satisfaction score across a broad range of indicators.

For example:

• CAA passenger survey had a 96% satisfaction rate at 12 applicable airports in 2014, up from 92% in 2013.

- The CAA has recently commissioned research into consumer experience, including for PRMs. The results showed that:
 - those PRMs that do fly frequently (within the last 12 months), fly as frequently as non-PRMs
 - 77% of PRMs were satisfied with the assistance provided by the airline and 84% were satisfied with the assistance provided by the UK departing airport
- Emerging results from the PRMs airport survey are encouraging
 - 500 responses so far
 - 60-80% satisfaction (a rating of 'excellent', 'good' or 'acceptable') the survey is self-selecting so is likely to have a negative sample bias.

We, together with industry, believe we have a responsibility in getting this positive message to PRMs so as to encourage more to travel. However there is evidence that this message is not getting to all PRMs: although there is a sub-group of PRMs that do fly frequently, our consumer research showed that this sub-group is much smaller for physical PRMs than for non-PRMs – only 34% of those people with a physical disability or health condition had flown at least once in the past year compared to 54% of non-PRMs. In addition, 40% of PRMs say they are not well informed about what to expect during a journey and how to prepare for it. This is also reflected in that only 38% of PRMs who have flown in the last 12 months actually requested assistance.

Our major new work area for 2015/2016 will therefore be in improving information for PRMs. CAA Communications activity will take a positive approach that focuses on reassuring passengers that they will get the support they need to enjoy safe and comfortable flights; thus increasing their willingness to travel by air. Working through specialist media and disability groups, we intend to export the positive message about the PRM service to encourage PRM infrequent and non-flyers.

James Fremantle Consumer Enforcement Manager CAA