

CAA guidance for airports on providing assistance to people with hidden disabilities

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Introduction

1. The aim of [Regulation EC1107/2006](#)¹ (the Regulation) concerning the rights of disabled persons and persons with reduced mobility when travelling by air is to ensure that disabled people have the same opportunities for air travel as non-disabled people, in particular that they have the same rights to free movement, freedom of choice and non-discrimination. A disabled person and person with reduced mobility is defined in the Regulation as “any person whose mobility when using air transport is reduced due to any physical disability (sensory or locomotor, permanent or temporary), **intellectual disability or impairment**, or any other cause of disability, or age”. It is the CAA’s view, based on engagement with disability organisations, that ‘hidden disabilities’ should be considered to include, but not be limited to, dementia, autism, learning disabilities, anxiety issues, mental health conditions, visual impairments and hearing loss.
2. In addition, under the Regulation, airports are required to set appropriate quality standards for this assistance to ensure that it is delivered to an acceptable standard for all disabled people and those with mobility restrictions and to publish performance data against these standards. The quality standards must be set in cooperation with airport users and disability organisations.
3. In relation to airports, the requirements of the Regulation deal mostly with the assistance that airports are required to provide to disabled people and those with mobility restrictions (usually through a contracted service provider) to help them move around the airport and complete necessary checks and formalities. In arranging provision of assistance under the Regulation, airports should also have regard to [European Civil Aviation Conference \(ECAC\) Document 30, Part 1, Section 5](#).²

¹ <http://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX%3A32006R1107>

² <https://www.ecac-ceac.org/ecac-docs>

4. Further, under the Regulation, airports are required to communicate information needed to take flights in accessible formats. It is the CAA's view that this incorporates information provided both prior to travel and at the airport. Following engagement with the CAA in 2014, UK airports published certain key information for disabled people and those with mobility restrictions in a clear and easy to understand way on their websites, in compliance with the Regulation.
5. The purpose of this guidance is to help clarify the requirements of the Regulation (in light of the relevant guidance from the CAA, the European Commission and ECAC) in relation to providing assistance to people with hidden disabilities, setting appropriate quality standards for this assistance, and providing information to this group of passengers.

Chapter 1

Assistance at the airport

6. The Regulation covers people with visible and non-visible disabilities. Therefore airports must provide the assistance required under Annex I of the Regulation in a way that is adapted to the needs of disabled people and people with reduced mobility based on their disability and assistance needs. When providing assistance, airports must be aware that many people may have more than one disability. A person with a hidden disability may also have a visible disability and therefore may also require mobility assistance.
7. Airports should recognise that the widely varying needs of people with hidden disabilities require them to offer a different type of assistance to that usually offered to people with a visible disability (namely a wheelchair or a buggy service). People with hidden disabilities may require other types of assistance, such as a one-to-one escort through the airport. If a disabled person, person with reduced mobility or accompanying person requests an escort, airports must ensure that they can offer this service at all stages of the passenger journey, even if the person is already accompanied. Staff should stay with a disabled person or person with reduced mobility at all times and until the assistance is no longer needed by the passenger.
8. Given the varying needs of all disabled people, and particularly in order to ensure appropriate assistance is provided to those whose disability may not be visible, airports should be flexible in their approach to providing this assistance. Whilst airports are obliged to provide assistance under the Regulation where the person has provided notification of their particular needs, if no such notification has been provided airports must still make all reasonable efforts to provide the necessary assistance.

9. People with hidden disabilities must **never** be separated from accompanying persons when receiving the necessary airport assistance under Annex I of the Regulation e.g. during a security search.

10. In the recitals of the Regulation reference is made to the need for airports, where possible, to take into account the needs of disabled people and people with reduced mobility in deciding on the design of new airports and terminals and major refurbishments. To this end, and where space allows, airports should consider providing a 'quiet area' where disabled people and people with reduced mobility can wait if they prefer. They should also consider establishing a 'quiet route' through the airport, for example bypassing the retail area, which can be used by those with sensory impairments or sensory processing issues, for whom the terminal environment can be disorienting and stressful.

Chapter 2

Information and communication prior to travel and at the airport

11. Our engagement with organisations representing people with hidden disabilities indicates that people want to be in control of the assistance they receive but that they do not always get clear information before they travel about what assistance is available. Clearer and more detailed information on the assistance available for people with hidden disabilities, made easily available prior to the date of travel, should help to give people greater confidence that the assistance available will meet their individual needs. Airports should therefore present this information on their websites and in other accessible formats such as hard copy “guides” (available in the terminal or printable from airport websites) in a clear and easy to understand way and accessible for people with hidden disabilities. Airports should also include any other information specific to people with hidden disabilities, in particular the location of toilets, quiet areas, assistance and information points, and the security search procedure.
12. The Regulation states that “The assistance provided shall, as far as possible, be appropriate to the particular needs of the individual passenger.” Airports should therefore have in place systems that are able to receive extra information through any “free text” contained within PAL and CAL messages, in addition to general IATA assistance codes.
13. Airports should use videos, photos and pictures of airport processes, where possible. This will aid with familiarisation of the overall airport environment and may help ease anxiety and stress for the person before they travel. (Note that for people with a visual impairment, screen readable text for websites will ensure that a ‘verbal picture’ can be built up of the airport environment).

14. With regard to information about security, it is particularly important that airports explain clearly what actions may be required for security screening. This information will need to be communicated both prior to travel and at the airport itself. The information should include reference to possible close visual and physical examination and the use of security scanners. (Using pictures of security equipment and processes would be beneficial). Airports should inform disabled people and people with reduced mobility that security officers must make reasonable adjustments for disabled passengers and that security officers should always ask the passenger how this can best be achieved, bearing in mind that the security officer is under a legal obligation to satisfy him/herself, as far as reasonably practicable, that the person being screened is not in possession of any prohibited article. Airports should also inform disabled people and those with mobility restrictions that a passenger can request that any physical search takes place in a private area. Airports should make clear and explain the alternatives available for security screening if the usual method of screening is not appropriate (see section on “Security searches at the airport”). Airports must make it clear how passengers can request alternative screening. For example, they must set out whether the airport offers methods of identification, such as bracelets or lanyards, and give instructions about how the passenger can obtain these if they wish to do so.
15. Under the Regulation airports must ensure disabled people and those with mobility restrictions can “communicate their arrival at the airport and their request for assistance at the designated points inside and outside terminal buildings” and “receive communication of information needed to take flights in accessible formats”. Provision must be made for people who are less able to use visual displays. Audible announcements will generally meet this requirement. Alternatively airports can communicate this information in person.
16. Provision must also be made for those less able to rely on audible announcements. Airports should design and position the visual displays to ensure that they are easily readable by people with hearing loss. Airports

should also review their approach to 'way finding' and, in particular, the decluttering of signage to ensure that wayfinding signs are clearly visible, and the possibility for way finding markers to be placed on the floor of the airport on key passenger routes. A clearly signposted information desk should be available for people with hidden disabilities to obtain the information they need. In addition, use of clear pictograms throughout the airport can help passengers to find essential points such as toilets, quiet areas, and assistance and information points.

17. In relation to the use of hearing loops, airports should have regard to ECAC Doc 30 Annex 5E. This has specific guidance for airport staff on communicating with people with hearing loss, including using induction loops at key points, such as information desks and special assistance areas.
18. Finally, airports should consider facilitating 'familiarisation visits' for passengers prior to travel if these are requested. If possible, these might include visits airside. Airports might also hold open days, where disabled people and those with mobility restrictions, including those with hidden disabilities, are invited to experience the airport including, if possible, being inside an aircraft.

Chapter 3

Staff Training

19. People with hidden disabilities have widely varying needs. To meet these needs, a substantial emphasis must be placed on ensuring that passenger facing staff (including security staff – see next section) have a clear awareness and understanding of hidden disabilities and how to engage and communicate with such passengers and their families and friends. This in turn puts a substantial emphasis on staff training.
20. The Regulation sets out three levels of training obligations on airport staff or staff working for companies contracted by airport authorities. Under Article 11 of the Regulation airports must:
 - a. “ensure that all their personnel, including those employed by any sub-contractor, providing direct assistance to disabled persons and persons with reduced mobility have knowledge of how to meet the needs of persons having various disabilities or mobility impairments;
 - b. provide disability-equality and disability-awareness training to all their personnel working at the airport who deal directly with the travelling public;
 - c. ensure that, upon recruitment, all new employees attend disability related training and that personnel receive refresher training courses when appropriate”.
21. The European Commission’s [Interpretative Guidelines to the Regulation](#)³ suggest that staff (including sub-contractors) working on behalf of airport managing bodies, air carriers or ground-handling service providers who provide direct assistance to disabled persons and those with reduced mobility should have a specific and effective knowledge of how to meet

³ http://ec.europa.eu/transport/themes/passengers/air/doc/prm/2012-06-11-swd-2012-171_en.pdf (PDF)

the needs of these passengers. The Regulation also draws attention to ECAC Document 30, Part 1, Section 5 annexes on training of staff. This provides more detail on recommended practice, including for training of staff to meet the needs of people with hidden disabilities. Given the varied needs of people with hidden disabilities, training modules should cover awareness of the behaviours of people from the hidden disabilities spectrum, in particular dementia, autism, learning disabilities, anxiety issues, mental health impairments, visual impairments and hearing loss. Training modules should also cover communication with people with hidden disabilities, as well as the practical assistance they are likely to need when travelling by air. Training modules on meeting the needs of people with hidden disabilities should be covered in both initial and refresher training.

22. A number of organisations run accreditation schemes⁴ for such training. Airports should consider whether to participate in these schemes – not only will it improve the ability of staff to recognise people with hidden disabilities and understand their needs, it will also help to give passengers reassurance that staff training is of an acceptable standard.

⁴ See www.caa.co.uk/hiddendisabilities for an updated list of some of the major schemes.

Chapter 4

Security search at the airport

23. Our engagement with organisations representing people with hidden disabilities indicates that security is a process that can often cause significant levels of stress and anxiety, restricting access to air travel for this group of passengers.
24. Staff training is key to addressing this issue – as set out in the European Commission’s Interpretative Guidelines, airports should ensure that security staff receive appropriate training such that the dignity of people with hidden disabilities is preserved during checks. Training for security staff should take account of guidance contained in Annex 5G to ECAC Doc 30 and guidance issued in support of the UK’s National Aviation Security Programme by the Department for Transport.
25. All passengers must be screened effectively and, as far as possible, disabled passengers and those with reduced mobility should be screened in the same way as other passengers. However, security officers should make reasonable adjustments when screening / searching passengers with a hidden disability. Security staff should adopt the advice in Annex 5B to ECAC Doc 30 (‘Specialist guidance material for security staff – Key points for checks of disabled persons and PRMs’) in relation to the handling of checks involving disabled persons. In particular, staff should explain clearly what actions are required and ask the passenger how this can best be achieved and whether the passenger would prefer any search to take place in a private area. As the search is being carried out, staff should clearly explain their actions. Staff should also routinely seek to involve an accompanying person throughout, whether this is a member of staff or family, or a friend.
26. Security officers should consider using alternative methods of screening if they would better meet the needs of a disabled person. For example, where security scanners are in use, but where a person with a hidden

disability is unable to adopt the appropriate stance, alternative methods of screening might include using an enhanced hand search in private or, at the discretion of the security officer, other alternative methods.

27. People with hidden disabilities should **never** be separated from accompanying persons at security search areas or at any other stage of their journey through the airport.
28. To help security staff identify passengers with hidden disabilities, we strongly recommend that airports offer passengers and, if requested, those accompanying them, the option to identify themselves as needing assistance through wearing a suitably designed lanyard, bracelet, or similar. This should only ever be offered to the passenger on an optional basis. In any event, airports should ensure they have processes in place to allow people with hidden disabilities to be easily identify themselves to staff. This puts greater emphasis on enhanced training and communication for airport passenger facing staff and security staff.
29. Airports should also consider if an 'assistance' security lane is an option, where space and operational layouts permit. As a minimum, airports should allow people with hidden disabilities to access 'fast-track' or quieter security lanes at no extra cost.

Chapter 5

Quality Standards

30. Article 9(1) of the Regulation requires that airports with 150,000 commercial passengers or more set 'quality standards' for the assistance specified in Annex I of the Regulation and that these quality standards are published (Article 9(3)). This includes any assistance given to people with hidden disabilities. The CAA has produced [guidance on airports' obligations to set, monitor and publish quality standards](#)⁵.
31. Airports must set quality standards, and determine resources for meeting them, in cooperation with "organisations representing disabled passengers and passengers with reduced mobility." Airports should therefore consult regularly with organisations representing people with hidden disabilities and also individuals themselves. Because the type of assistance likely to be given to people with hidden disabilities may differ from other types of assistance on offer, airports should seek to enhance existing methods for setting and measuring quality standards so that they have a more complete assessment of the quality of the assistance provided to people with hidden disabilities. This is especially relevant in areas such as staff attitudes, behaviours and customer service skills. An appropriate quality assurance process should be implemented to maintain quality standards.

⁵ www.caa.co.uk/CAP1228