WP 2 Policy Recommendations

INCLAVI (INCLUSIVE AVIATION)

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This deliverable presents policy recommendations for the aviation industry on how to better develop the customer journey of passengers with disabilities (PwDs). The contents are based on extensive research of primary and secondary data undertaken in the framework of Inclavi, and include specific recommendations for the PWD customer journey, for better collaboration with aviation industry stakeholders, and for a more effective training of aviation industry staff.

Dit rapport presenteert beleidsaanbevelingen voor de luchtvaartindustrie over hoe de klantreis van passagiers met beperkte mobiliteit (PWD's) kan worden verbeterd. De inhoud is gebaseerd op een uitgebreid onderzoek op basis van primaire en secundaire data, uitgevoerd in het kader van Inclavi. Het omvat specifieke aanbevelingen voor het PWD-klanttraject, voor een betere samenwerking tussen belanghebbenden in de luchtvaartindustrie en voor een meer effectieve opleiding van personeel.

Tämä tuotos esittää ilmailualalle suosituksia siitä, miten liikuntarajoitteisten matkustajien (PWD) asiakaspolkua voidaan paremmin kehittää. Sisältö perustuu Inclavin puitteissa tehtyyn laajaan primaari- ja sekundaaridatan tutkimukseen, ja se sisältää erityisiä suosituksia liikuntarajoitteisten henkilöiden asiakaspolusta, paremmasta yhteistyöstä ilmailualan sidosryhmien välillä ja ilmailualan henkilöstön tehokkaammasta koulutuksesta.

Este documento presenta recomendaciones políticas para el sector de la aviación sobre cómo mejorar la experiencia de los pasajeros con movilidad reducida. Los contenidos se basan en una amplia investigación de datos primarios y secundarios realizada en el marco de Inclavi, e incluyen recomendaciones específicas para el viaje de los pasajeros con movilidad reducida (PMR), sobre una mejor colaboración con las partes interesadas de la industria de la aviación, y para una formación más eficaz para el personal de la industria de la aviación.

Bu proje çıktısı, havacılık endüstrisinde, hareket kısıtı olan özel gereksinimli yolcuların seyahat deneyiminin nasıl daha iyi geliştirilebileceğine ilişkin politika önerileri sunmaktadır. Inclavi proje içerikleri, proje kapsamında gerçekleştirilen birincil ve ikincil verilere ilişkin kapsamlı bir araştırmaya dayanmakta olup, hareket kısıtı olan özel gereksinimli yolcuların, havacılık sektöründe yer alan paydaşlarla işbirliklerinin geliştirilmesine ve havacılık sektörü personelinin mesleki eğitimleri ile kariyer gelişimine katkı sağlayacak diğer eğitimlerinin iyileştirilmesine yönelik öneriler içermektedir.

Executive Summary

This document is Deliverable 2.2 in Work Package 2 (WP2) of Inclavi project. The overall objective of WP2 is to *develop policy recommendations for the air transport sector and relevant EU disability initiatives*. This report serves as a foundation for WP3 (Module and Training Development and Piloting) by providing recommendations for the creation of training modules.

The policy recommendations provided in this document are based on:
- *an extensive review of the existing barriers that Passengers with disabilities (PwDs) face* as part of their passenger journey and
- *a review of the existing training in the industry, Higher Education Institutes (HEI) and Technical Vocational Education and Training (TVET)* that enable aviation professionals with skills required to work with PwDs.

The aims of WP2 in accordance with the project description include:
1. Gathering the latest insights into the current state of affairs in the training and education of aviation professionals, both in the industry, HEI and TVET, i.e. the scope and nature of contents used to address the topics of inclusivity and accessibility, the methods, and pedagogical approaches, as well as the digitalization of education.
2. Collecting the latest insights into the current state of affairs in the aviation industry from the point of view of accessible travel, i.e. standards, actual practices, development needs, existing and in-the-making solutions, stakeholders,' and users' visions.
3. Identifying skills mismatches that will form the basis for the creation of training modules for the Inclavi curriculum.

This deliverable contains policy recommendations for the aviation industry. It is based on data collected during Inclavi's first year of implementation, and presented in two milestone reports: a report on **Stakeholder and User Insights,** and a second one focusing on **Education and Training.** For more detailed information on the background and methods used for data collection, please refer to the two milestone reports, which are included in the previous deliverable (D 2.1., Summary Report).

The policy recommendations document is a concise summary of all input collected from PwDs and airline industry stakeholders, related to the strategic support required to improve the PwDs customer journey. Policy Recommendations are divided into three categories:

- Aviation industry staff training
- Improving attendance to PwDs and their customer journey
- Aviation Stakeholder Alignment

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Abbreviations

ENAT	European Network for Accessible Tourism
EC	European Commission
ECAC	European Civil Aviation Conference
EU	European Union
HEI	Higher Education Institution
IATA	International Air Transport Association
INCLAVI	Inclusive Aviation
NGO	Non-Governmental Organization
PRM	Passengers with Reduced Mobility
PWD	Persons with Disabilities
TVET	Technical Vocational Education and Training

1 Introduction

The research conducted in the framework of Inclavi's WP2 confirms that passengers who require special assistance at airports and onboard aircraft (PwDs) represent one of the fastest growing demographics for aviation worldwide. According to Budd (2020), in some airports annual growth in PwDs traffic is six times greater than the overall rate of passenger growth.

Aviation industry stakeholders have been working together to support PwDs in their customer journeys. At a national level, countries have introduced air passenger rights and consumer protection legislation, to specifically address the needs of disabled travellers. The goal of these regulations is to assure minimum service standards and levels of service provision to PwDs.

However, as these legal interventions have been developed on a country-by-country basis, we are witnessing a lack of international alignment, causing confusion and concern amongst stakeholders advocating for these rights.

IATA has been advocating for the harmonization of these regulations and procedures, seeking to develop global policies to better support the needs of PwDs and their travel journey.

This document presents a summary of proposed actions, based on the data collected during the Inclavi project (WP2). The ultimate goal of these recommendations is to allow aviation industry stakeholders to further agree on common policies and procedures, all the while enhancing harmonization at a global level.

2 Policy recommendations for improving attendance to PwDs and their customer journey.

The data collected under the Inclavi project shed light on opportunities for improvement of the customer journey of PwDs. These led to the following recommendations for every stage of the customer journey.

"Booking" and "preparing to travel" phases

Issue:
Accessing the right information (online or via phone) is not always easy. This may be due to website accessibility issues, lack of standard procedures, miscommunications, lack of knowledge by assisting staff and other communication, awareness or knowledge barriers, or difficulties in disclosing personal information. It can sometimes lead to stress, anxiety, and fear of the unknown in the preparation of the travel journey.

Recommendations:
- o Make airline websites universally accessible by adhering to specialized guidelines, such as WCAG (Web Content Accessibility Guidelines).
- o Define and incorporate consistent language and terminology to be used during the booking stages, also using visual representations.
- o Implement identification badges or passes (e.g., an "autipas" for autism) that passengers can display or communicate to discretely inform airline staff of their unique needs. This can help reduce the need for personal explanations and ensure a higher level of privacy.
- o Create a *universal assistance form* provided by the organization where passengers' service dogs are trained. The form should be available in multiple languages, certifying that the traveler must be accompanied by a service dog. This form can make it easier for passengers who may not speak the local language to communicate their needs and it should help prevent abuse of this service by passengers who are not in the need for it.
- o Define and implement systems for a clear indication of the personal condition. To simplify the booking process, passengers recommend receiving an offer to indicate their condition (such as visual impairment, autism, or mobility disabilities), at the beginning of the booking process. This would eliminate the need to navigate through multiple pages and extra sections to request assistance.
- o Streamline assistance requests. When booking a flight, there should be a simple and clear option to request assistance. This process should be integrated into the online booking system, allowing passengers to check a box or provide information about their specific access requirements during the entire trip, including return flight.
- o Immediate confirmation for assistance requests. To make the process more convenient, passengers recommend receiving immediate confirmation that their wheelchair will be taken along and not having to request it separately. Additionally,

there should be a clear and timely response, maximum of 24 hours, to confirm that the requested assistance has been arranged.
- o Early seat selection/allocation: PwDs often have specific seating preferences to accommodate their needs. Providing the option and giving the priority to choose seats at the front of the plane, closer to restrooms or with more space, would be beneficial. However, it is important that this process is made more accessible and less costly.

Mobility to airport

Issue:
PwDs face challenges in this phase of the customer journey. These are often infrastructural and relate directly to the broader set of stakeholders beyond airlines.

Recommendations:
- o As soon as regulation allows, integrate the air travel journey into an overall "multi-modal mobility chain", including the transport from home to airport and back. This may help to provide an efficient, accessible, and sustainable transport service for everybody.
- o Local authorities should procure to create quiet or silent areas within public transportation systems to accommodate passengers who may have sensory sensitivities or disorders, making the journey to the airport less stressful for them.
- o Airports should strive for *on-time performance* to minimize disruptions and ensure that passengers with disabilities can plan their travel more effectively, especially when relying on wheelchair taxis and other accessible transport options.
- o Airports should ensure prompt assistance of PwDs upon their arrival at the premises.
- o Regulators should collaborate to standardize airport *signage*.

Airport services (Check-in, security, shopping)

Issue:
PwDs experience stress during their stay at airports related to various factors.

Recommendations:
- o Airports should provide clear information, as much as possible real-time, and in accessible formats, about the availability of disability-friendly transportation options, such as wheelchair-accessible taxis or minivans, and how passengers can access these services.
- o Airports should clearly inform passengers about the location of essential services, such as pet relief areas.
- o Design and incorporate sensory-avoiding paths at airports to minimize exposure to overwhelming stimuli for individuals with conditions like autism, ensuring a calmer and more comfortable journey.

- o Make assistance desks readily available and visible at the airport entrance. Passengers should have the option to check in and receive assistance right away, streamlining the process for those who may struggle with orientation.
- o Improved communication tools by developing mobile apps for airports with voice navigation features and airport layouts, providing step-by-step directions to gates and facilities. These apps should be compatible with screen readers and have accessibility features for individuals with visual impairments.

Boarding and seating

Issue:
Among other difficulties and uncertainty regarding on-board services, this stage poses challenges to PwDs, particularly immobilized traveling with their own mobility aid. These passengers need to undergo transfer procedures from the wheelchair to the seat, sometimes causing physical discomfort, injuries.

Recommendations:
- o Extra attention should be paid to increase staff awareness, as well as enhancing their communication and other soft skills.
- o Embrace concepts of usability, inclusive and universal designs in all infrastructure and more particularly in airports and aircraft.
- o Providing a clear and accessible information to PwDs on airport procedures, gate changes, and connecting flights can help reduce stress and confusion. Enhance communication with PwDs during embarking/disembarking.

3   Policy Recommendations for aviation stakeholder alignment

Issue:

All relevant stakeholders agree that the number of PwDs is growing, and considering the ageing population, these will represent an increasing proportion of total passengers in certain jurisdictions. There are several reasons for this growth:

- o   The wide scope of application of the term. The category of PwDs includes people with disabilities (including temporary disabilities) and less mobile people (e.g. elderly passengers).
- o   An ageing population with disposable income and a higher propensity to fly that is more likely to require assistance.
- o   Increased awareness that PwD assistance is available.

This common understanding legitimizes further policy development by the aviation industry. PwDs have the right to receive appropriate assistance at their origin airport, so that they are able to travel, that their mobility equipment or other assistive devices are designed with air transport in mind so that those are loaded and transported securely, and that they are able to disembark in a timely manner, prior to receiving appropriate assistance at their destination airport. Airlines are not allowed to deny PwDs on the basis of their disability, except when the transportation of passenger does not meet safety requirements. Aviation industry stakeholders such as PWD representatives agree that the level of service provided by airports and airlines complies with the requirements of European Commission Regulation (EC) 1107/2006 regulation. However, specific design and infrastructure can impact the quality of the assistance service received at each airport.

Recommendations:

- -   There is a need in Europe to review the definition of persons with disability so that it aligns to the UN Convention on Persons with Disabilities.
- -   Airlines, airports, and ground handlers should operationalize the IATA guidance on the transport of mobility aids. This includes raising communication standards for passengers with disabilities, an accessible website, in addition to the revision of training of ground handlers and airline staff (IATA, 2023).
- -   States should harmonize their PwD regulations and share best practices. This would contribute to providing greater clarity and certainty for airports, airline operators, and service users.
- -   Information on PwDs rights and responsibilities when travelling by air should be more accessible, visible, and transparent.
- -   Mechanisms for requesting PwD assistance and reporting incidents of service failure should be improved so that passengers are aware of their rights and know when they can seek redress.
- -   A joint agreement is needed by airline industry stakeholders regarding the cost of PwD service provision and how to prevent possible service abuse.
- -   Existing legislation may need to be revised to make its scope and terminology clear and unambiguous. ICAO should enact global strategies and principles to guide states.

4 Policy Recommendations for aviation industry staff training

Issue:
Aviation industry staff training such as promoted by Inclavi could contribute to the improvement of PwDs customer journey.

Recommendations:
- Train customer-facing staff to ensure that all passengers, regardless of their abilities, are treated with respect and dignity at airports and on board.
- Ground handlers and airport staff should be trained in handling mobility aids and assistive devices to prevent damage during transportation.
- Airlines and airport staff should be educated and prepared to interact with passengers who have sensory disorders, mobility impairments, or other specific needs. This training should ensure staff have sufficient knowledge on the disorder, and displays awareness and sensitivity, including understanding, patience, and clear communication. As this might become a society issue in the future, authorities should include sensory disorders awareness in their social programs.
- Train airport and airline staff in empathetic and effective communication. This will instil confidence in PwDs and make them feel understood and catered to during the entire journey.
- Train back-office staff or staff, who do not have direct contact with customers on accessibility needs. An example of this is procurement staff (e.g., website designers or architects/designers of airport infrastructure and facilities).
- Include generic management-levels of airports and airlines on PwD awareness and possible policies. In these generic management trainings, procure to include recommendations of front-line staff, as these are a possible source of information on system failures and possible improvements (list of problems and solutions).
- Procure to include a variety of PwDs with diverse backgrounds, in the design, testing, and implementation of any capacity building programme

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