



Department  
for Transport

Independent report

# **Aviation Accessibility Task and Finish Group report**

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# Foreword

I would like to thank the Department for Transport for inviting me to chair the Aviation Accessibility Task and Finish Group (AATFG). The Group were engaged throughout and dedicated much time and effort to finding solutions to the problem that we are trying to solve, namely the experience of flying for Disabled people can be ad hoc, inconsistent and sometimes catastrophic.

There are approximately 2 million flights per year that arrive or depart the UK. It is hard to establish accurate data on how many Disabled people fly, but it could be around 1.5% of all passengers. What became clear is that there was no pattern of good and poor performances and while many journeys occur perfectly well there are still too many gaps and poor experiences. One poor experience can create obstacles for future travel or stop someone flying altogether.

There are some tough challenges to tackle. There has been a rise in requests for assistance and that as a term is quite wide ranging. The type of request for support can range from navigating an airport (where there may be long walks), to needing an aisle chair or a much higher level of support. Passengers should be as independent as possible but that requires a nuance in the service that is offered.

Disabled people are not one homogenous group and what they require can be very different depending on

multiple factors, meaning there is not one solution that fits all. Unsurprisingly there has been many calls for a more tailored improved service, through training that puts the voices of lived experiences at the heart of it.

The issues that can occur can include but are not limited to, missing flights or connections, lack of empathy, use of non-inclusive language, mobility equipment broken or going missing, or an extended period to wait to embark / disembark. It can also include inaccurate application of the rules on travelling with batteries or what mobility aids are allowed.

Some of the cases of poor experiences hit the media headlines but the reality is most do not. Those that do may remain as a story for a day or so, but then slip away and to the users it feels like the issue has been forgotten. Many people reported being frustrated that it is difficult to complain or find a resolution in a timely manner. Some said that they do not complain because of the challenges of doing so. A number of cases were reported to me that were just not great, but the individuals didn't feel it either warranted their time raising it or nothing could be done. It is also hard to provide general feedback which could result in service improvement which is not in itself a complaint.

Travelling by plane should be relatively simple. It should be booking a flight, pre-notifying of needs where possible (which does help planning) turning up at the airport and receiving the support you need to get on a plane. The

procedures that sit behind this are more complicated. Booking assistance is not as simple as it could be, there are many different ways that this can be actioned. It is not always easily understood as to who has jurisdiction or responsibility for various parts of the journey and that is why when it goes wrong it is hard to find the right place to seek a response.

The paucity of accurate data is an issue. Where there is data available it doesn't necessarily reflect some of the variety of experiences that people have. A number of Disabled people got in touch directly and offered positive solutions about changes that could be made. What became clear is that many Disabled people do not know what to expect from their journeys. Some I spoke to said that they didn't know what an appropriate time to wait for a mobility aid, or assistance off a plane was. This can lead to inconsistency of experience.

There were many detailed debates on a range of issues which are not able to be taken forward at this time. Some solutions that were suggested were reliant on international jurisdictions and rules. For example, a detailed and useful debate on the use of batteries as part of a mobility aid. The debate on batteries will continue to evolve and while it is important to note the safety implications and how serious they are for the industry, clear information is a must. Those who use equipment that require batteries are able to have a smooth transition through an airport and there must be a strong and clear understanding of the rules so that they are properly and

universally applied. But this is one area where we do not have control of the system outside the UK. There have been some examples where individuals have been able to leave the UK with a device but are not able to bring it back.

Another area where there was extensive discussion, in terms of non-visible impairments and listening to those who fed into the process, there was no firm view on the continuing use of either a badge or lanyard being used to identify people who may need some extra support. There was a very wide range of opinions of how and why individuals used them.

There were many areas suggested that were out of scope. Several people said that it would be helpful to have access to a free carer ticket but this was outside our remit. Being able to change the name on tickets at late notice was another suggestion. There were also suggestions for adaptable tray tables and footstools. There were very helpful meetings with those that work in the area of allergies. Again, it was not possible to make recommendations that sat across different jurisdictions, but it is important to keep highlighting these issues.

There were some suggestions made which were for very specific products or services which were not within scope. It was also not possible to include recommendations for passengers who want to remain in their chairs while flying. There is ongoing work in this

area which cuts across jurisdictions. The same goes for a system of fining for failures.

This report is not seeking to look at experiences that would impact all passengers such as flight delays. It is purely about improving the experiences that have an impact on an individual because they are disabled. In practice I have no power to enforce any recommendation, so it is based on the goodwill of the industry who want to do better. The AATFG and those who we met will have heard me say there is no budget that comes with this and at the time of writing the government had no legislative plans in the pipeline, so it was essential that all recommendations are practical. That did not stop me from leaving behind some ideas if the government were 'so minded' in the future. What was a long list of suggestions (168) has been summarised into the recommendations presented here.

What became clear and was endorsed by all was that everyone deserves to be treated with respect through the process and should be able to fly without worry. Finally, I would like to thank the wider industry for having positive and constructive conversations, their commitment and their willingness to keep seeking improvements beyond the life of this project.

Baroness Tanni Grey-Thompson

# Executive summary

## Background

Since the pandemic there has been a significant increase in the number of passengers requesting assistance to enable them to travel by air. According to the most recent Civil Aviation Authority (CAA) data, in 2024, 5.5 million passengers requested assistance at a UK airport, which equates to approximately 1.9% of total passengers. This has increased from 0.94% in 2010, 1.35% in 2019 and 1.69% in 2023.

The most recent CAA survey data shows that Disabled passengers remain less satisfied with air travel than non-disabled and younger passengers. **See the CAA Aviation Consumer Survey October 2024 (Wave 13).**

Whilst there have been improvements in recent years, there remain unacceptable barriers to air travel for this group of travellers, with many examples of poor and inappropriate service, passengers being left onboard aircraft for long periods, damaged mobility aids, and discriminatory behaviour.

The Aviation Accessibility Task and Finish Group (AATFG) was established by the Department for Transport (DfT) to bring together industry, consumer representatives and the sector regulator (CAA), to help drive improvements in aviation accessibility for Disabled passengers. The AATFG's remit was to:



- assess existing and emerging evidence on key issues and barriers to air travel for Disabled passengers, and identify priority focus areas for the AATFG to address during its term
- develop practical and achievable actions (short, medium and long-term) in these priority focus areas to facilitate improvements that can be implemented by industry, and where appropriate, by the government or regulator
- consider the most effective mechanism for implementing actions and evaluating their impact

## Methodology

Following the first meeting of the AATFG on 20 November 2024, the members agreed on five key focus areas:

- training
- passenger information and communication
- **non-visible impairments**
- mobility aid design and handling
- tailored support and delivery

To effectively focus on each of these areas, members divided into sub-groups, based on where members had most knowledge and skills to input into discussions and development of actions.

Sub-groups met at least once a month to discuss and develop recommendations to be taken to the monthly full AATFG meetings. These main group sessions enabled wider input from all members on each sub-group and all decisions on recommendations were made collectively.

Members were encouraged to engage widely to seek input from individuals and organisations to help inform the AATFG's work. The Chair regularly engaged with individuals and organisations to hear input and suggestions for improvements. In addition, a series of engagement sessions were hosted by the Chair. Further details on engagement are set out in Annex C.

The AATFG collated a long list of suggestions (168 in total), which included an assessment of a range of criteria including feasibility, implementation timeframes and potential impact on passenger experience. Following multiple rounds of consideration of these suggestions, the problem statement for each of the sub-group areas, and the aim of developing practical and achievable actions, a set of recommendations were agreed by the AATFG.

This report sets out the set of recommendations for industry, government and the CAA, alongside the wider considerations of the AATFG.

# Overarching themes and areas of consideration

There were three overarching themes to all the discussions of the AATFG. Central to the AATFG's work, and the approach that should be had by the sector, is ensuring passengers are able to travel with dignity. Secondly, and importantly linked to the first, is improving the culture of the sector. This included considerations around language, ensuring accessibility is at the heart of all processes and procedures, more consideration of accessibility in lifeline and medical routes, raising the profile of the importance of accessibility through internships and qualifications, and the role of senior leaders to really demonstrate the importance of accessibility throughout every part of the sector. The third theme was the importance of a needs-based approach.

There were three other areas that were pervasive throughout discussions:

## Misuse

Concerns were raised by both industry and consumers about the potential misuse of the **assistance service** by those who may not need the support. This could be for a range of reasons, including avoiding queues, or unfamiliarity with air travel or language barriers that result in passengers wanting assistance with wayfinding. Misuse is of course hard to identify, and the AATFG does not want to discourage passengers from seeking support.

However, any misuse, for whatever reason, has the potential to divert resources away from those who really need the support. There were some discussions around measures to mitigate potential misuse, including general improvements to passenger experience, e.g. shorter queues, tailoring support to assist with independent journeys and examples of innovative alternative services.

## **Pre-notification**

It is highly encouraged for passengers to notify industry of the support they might need in advance of travel. This helps the industry to better prepare resources, and ultimately tailor the support it can offer to passengers. Whilst it is not always possible to pre-notify, passengers are encouraged to do so, as early as possible.

## **International nature of the sector**

This results in different rules and requirements across jurisdictions which can conflict and create confusion. This was fully considered across all discussions, and recommendations, to help industry provide a seamless service of accessibility across its networks, however, the AATFG could only make recommendations within the UK.

## **Use of language**

The language used within the aviation sector is often outdated, and the members were supportive of the industry adopting much more inclusive language. This includes moving away from terms such as “special

assistance” and “passengers with reduced mobility (PRM).” Instead, industry is encouraged to use terms such as “assisted travel” or “assistance services”.

This report has utilised terminology and language following the principles set out in the **social model of disability**. The social model says that people are disabled by barriers in society, not by their **impairment** or condition. Under this model “Disabled people” or “Disabled person” signifies a collective cultural identity of a shared, disabling experience that people with impairments face in society. The use of “Disabled passenger” in this report refers to anyone with an impairment or medical condition that is disabled by part of the aviation journey.

Whilst this is the model the report and AATFG follow, it is fully recognised that at a more individual level, some may not relate to, or use, this language.

# **Recommendations**

## **1. Mandate baseline disability and accessibility awareness training**

While training should be proportionate and appropriate to each role, airports and airlines should ensure all personnel receive essential baseline disability and accessibility awareness training. This could be achieved through a requirement for such training to be a condition for obtaining an airport pass and/or included in airport contract terms.

## **2. Co-develop training materials with people with lived experience**

Industry should incorporate input from Disabled people when developing training materials, ensuring they reflect real-world challenges and solutions. The materials could include, for example, videos and testimonials to bring personal perspectives to life and enhance understanding.

## **3. Increase the availability of skilled trainers**

Industry should make efforts to expand and develop the pool of trainers with lived experience. Where appropriate and proportionate, training should be delivered by

trainers who combine subject expertise and lived experience across a range of impairments.

## **4. Improve and standardise training content**

Industry should develop a consistent, enhanced training package for all aviation staff, including airline crew, assistance service providers, ground services and security, and at all levels. Content should be proportionate and appropriate to each role.

## **5. Ensure continuous improvement of training**

Industry should ensure regular updates to training content, drawing on both positive and negative incidents, to improve service quality for Disabled passengers.

These updates can be made throughout the year, including more agile approaches such as briefings to staff and sharing real-time experiences across industry, ensuring continuous learning and adaptation.

## **6. Improve access to standardised accessibility information**

Airlines and airports should implement the 'One Click' standard to enable easy access to key and specific information, to allow customers to make informed decisions. Information should include how to request and

book both airport and airline assistance, available in-airport assistance services and where those are located, onboard seating and medical clearance policies, detailed guidance on the carriage of mobility aids, and recognised assistance dogs and conditions of when an accompanying person is required. The standard should also include, roles and responsibilities of the airline, the airport and the passenger.

## **7. Create airport accessibility guides**

Airports should develop comprehensive accessibility guides, detailing available services, accessible facilities, wayfinding options, and how passengers can request support. These guides should ensure that Disabled passengers can navigate the airport and access all necessary facilities, services and assistance.

## **8. Ensure digital accessibility**

Industry should ensure that all digital communications, including websites, mobile apps, and email are fully accessible and user friendly for all passengers. This should be in line with existing guidelines and designed and tested with a pan-impaired range of Disabled users.



## **9. Enhance access to assistance throughout the airport journey**

Airports and assistance service providers should provide passengers with mechanisms to access assistance throughout the airport. Recognising the varying sizes and operations at airports, examples to achieve this could include more staffed help desks, real-time updates via SMS, email, and in-app notifications to keep passengers informed about flight status, gate changes, and assistance options, two-way communication, and alternative methods to contact support staff when required.

## **10. Ensure clear passenger rights and complaints procedures**

Airlines and airports should ensure passengers have access to transparent, clear and accessible information about their rights and how to raise a complaint. This could include the establishment of a voluntary complaint resolution officer, as well as clear escalation routes.

## **11. Include pan-impairment requirements in airport accessibility reviews**

Airports should ensure that accessibility reviews include considerations for diverse impairments including non-

visible. These should specifically address the needs of diverse groups, ensuring that all passengers, regardless of their impairment, have access to appropriate facilities, services, and support throughout the airport journey.

## **12. Develop awareness campaigns to increase confidence to fly**

Industry should consider developing targeted awareness campaigns aimed at reducing the stigma and increasing confidence for passengers with non-visible impairments to ask for support. These campaigns should also educate staff and the general public on the challenges faced by passengers with non-visible impairments, encouraging empathy, understanding, and support.

## **13. Ensure clear communication with passengers about mobility aids**

Ground services and assistance service provider staff should ensure clear communication with passengers regarding the handling of their mobility aids. Passengers should be informed of the relevant rules and procedures, asked about the specifics of their mobility aid, and made aware of how it will be handled throughout the journey. Passengers also have a responsibility to provide accurate and up-to-date information.

## **14. Establish a working group on mobility aid design and handling**

The AATFG identified areas in the design and handling of mobility aids that could benefit from ongoing consideration. An industry-led group, with representation from various organisations, including manufacturers, could help sustain progress in this area.

## **15. Develop improved means of capturing passenger needs**

Industry should develop better systems to capture and communicate passenger's accessibility information, to ensure that specific needs are accurately responded to.

## **16. Ensure appropriate equipment is used**

Airports, assistance service providers and ground services should ensure that equipment and vehicles are used in the provision of appropriate assistance to passengers and handling of personal mobility aids. Equipment must have been specifically designed for these purposes and properly maintained.

## **17. Develop self-assessment tool**

CAA should create maturity matrices for requirements in legislation and guidance in the UK, which industry can

use as a self-assessment tool for compliance with CAA accessibility standards.

## 18. Review and update existing guidance

CAA should review and update existing guidance on CAA Airport Performance Framework (CAP1228).

## 19. Review and update existing oversight

CAA should regularly review and update existing CAA oversight in these priority areas:

- standardisation of assistance dog relief areas
- standardised **fit to fly forms**
- impact of flight disruption on Disabled passengers
- mobility aid damage data
- airport end-to-end journey data
- training package audits
- increased use of the Airport Accessibility Forums
- inclusive design for airports and aircraft

# Theme 1 – Training

## Problem statement

Disability and accessibility training is inconsistent in quality, scope and delivery across the aviation industry. This results in gaps in staff knowledge, inconsistencies in the way passengers are treated, and the needs of passengers being unmet. Training content does not include enough insights from people with **lived experience** and lacks standardisation, making it hard for the CAA to benchmark and assess performance.

## Considerations and recommendations

The AATFG considered the current landscape of legislation and guidance on training, before identifying key areas that could build on the existing framework to strengthen and standardise training across the industry.

### **Accessibility awareness and training at all levels**

Under UK law (Regulation 1107/2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air) there is a requirement that all staff dealing directly with the travelling public receive disability-equality and disability-awareness training both on recruitment and periodic refreshers. In addition, those

who provide direct assistance must have the knowledge to meet the individual needs of the passenger.

As part of this requirement, due regard should be given to document 30 of the European Civil Aviation Conference (ECAC doc 30).

The AATFG considered that the legislation and ECAC doc 30 remain a good baseline for aviation accessibility training. However, the Group felt that baseline training should be provided to all staff to help promote an inclusive and empathetic culture from the top of organisations. This should include all staff working within the aviation industry, regardless of whether they have direct contact with the travelling public as part of their role. This includes anyone working in an airport, regardless of role, and should include an awareness of what accessibility facilities there are, and where they can be found, in case approached by a passenger for assistance. In addition, staff should have an awareness of how their work might impact a Disabled passenger, for example, keeping areas clear of obstacles, and treating passengers with dignity and respect. Not all staff will require the same level of training, and therefore training should be proportionate and appropriate for each role. Some roles, particularly those providing assistance services, will require more advanced training than others, and this training must be provided before those staff become operational. Industry should use methods that will ensure all personnel, including sub-contractors, receive sufficient training before starting a new role, or for

those already working within the aviation environment, through refresher training.

## **Recommendation 1: Mandate baseline disability and accessibility awareness training**

While training should be proportionate and appropriate to each role, airports and airlines should ensure all personnel receive essential baseline disability and accessibility awareness training. This could be achieved through a requirement for such training to be a condition for obtaining an airport pass and/or included in airport contract terms.

## **Involving lived experience**

It is vital that the development and delivery of training incorporates input from people with lived experience. This helps staff to gain a real understanding of the different challenges faced by passengers, and the impacts of their work. This includes the co-development of training materials with a range of pan-impaired passengers, and incorporating the views and experiences of those individuals, for example through videos and testimonials. The AATFG talked about poor take-up of existing training packages that have been developed alongside people with lived experience. The DfT's REAL training modules offer a specific example of standardisation that could be adopted by industry.

## **Recommendation 2: Co-develop training materials with people with lived experience**

Industry should incorporate input from Disabled people when developing training materials, ensuring they reflect real-world challenges and solutions. The materials could include, for example, videos and testimonials to bring personal perspectives to life and enhance understanding.

The AATFG also recognised that training may be more impactful when delivered by trainers with lived experience. Whilst this may not always be possible given operational requirements and training structures, where possible the AATFG believes that efforts should be made to increase the availability of trainers with lived experience across the sector, including for example, individuals with lived experience working alongside other experienced trainers.

## **Recommendation 3: Increase the availability of skilled trainers**

Industry should make efforts to expand and develop the pool of trainers with lived experience. Where appropriate and proportionate, training should be delivered by trainers who combine subject expertise and lived experience across a range of impairments.

## **Standardised training content**

One of the key issues identified by the AATFG is the lack of consistency across the industry in terms of training content and delivery. This results in patchy training that



leaves staff unprepared to support passengers based on their individual needs.

Whilst the AATFG is clear that all staff working throughout the industry, including anyone working in an airport, should have a baseline level of training and awareness, there are of course certain roles that require more detailed knowledge. The AATFG identified gaps in accessibility and disability training in certain parts of the sector – in particular security and **ground services** staff.

During consultation with passengers, security was flagged as a key area of anxiety and concern for Disabled passengers, with multiple examples of being treated in an undignified manner by security staff. Whilst security is the highest priority in aviation, there is a clear gap in the training and awareness of security staff in the treatment of Disabled passengers and their equipment. In particular, training for security staff may include better awareness of the types of **in-dwelling medical equipment**, and considering means of keeping up-to-date with this quickly evolving area, such as building relationships with relevant charities and working with existing airport **accessibility forums**.

Ground services staff, in particular those handling and stowing mobility equipment, would also benefit from more bespoke training, not only on the technical aspects of handling equipment (including batteries), but also understanding the importance of such equipment and the impact of damage on passengers.

Ensuring a standard level of training for each type of role is a means of ensuring staff receive proportionate and appropriate training. The AATFG developed a pilot project that brought together the basic disability awareness training required and delivered by different organisations. This has formed the basis of a training framework, that could be rolled out across industry and monitored more easily by the CAA.

There was also a lot of consideration of the content of such training. It was clear that it is key that staff have an understanding of different impairments, including non-visible, and the barriers that individuals may face. However, they must also bear in mind that all passengers will have different needs, and that support must be tailored to meet those needs to ensure passengers are treated with dignity and sensitivity. Another area of concern was around understanding of allergies and how passengers with allergies can be supported whilst flying.

## **Recommendation 4: Improve and standardise training content**

Industry should develop a consistent, enhanced training package for all aviation staff, including airline crew, assistance service providers, ground services and security, and at all levels. Content should be proportionate and appropriate to each role.

## Continuous improvement

Whilst initial training of staff is key, the AATFG was clear that of equal importance is the need for regular and relevant refresher training to ensure staff are kept up to date and continue to improve assistance services.

Beyond this, training cannot remain static, and industry should consider how to incorporate lessons learnt from both positive and negative feedback (either from passengers or airport accessibility forums), as well as changes such as new medical equipment. The AATFG also considered there is a place for real-time sharing of experiences across industry organisations, in a similar manner to other incidents. This information should be available to staff quickly and in an agile way, as well as being incorporated into regular formal training materials.

### **Recommendation 5: Ensure continuous improvement of training**

Industry should ensure regular updates to training content, drawing on both positive and negative incidents, to improve service quality for Disabled passengers.

These updates can be made throughout the year, including more agile approaches such as briefings to staff and sharing real-time experiences across industry, ensuring continuous learning and adaptation.

# **Theme 2 – Passenger information and communications**

## **Problem statement**

There is a lack of clear, standardised information about what support is available for Disabled passengers. This often leads to confusion about how to make critical arrangements, passenger needs and responsibilities.

## **Considerations and recommendations**

### **Standardised information**

The AATFG heard clear feedback from consumers that necessary information relating to assistance services, is inconsistent, and often causes confusion. Some of the key areas flagged that should be addressed include, booking, policies around booking seats, companions and assistance dogs, guidance on travelling with health conditions that require medical equipment such as oxygen or medication and allergies. Industry should ensure that information is clear and easily accessible to passengers, so that they can best prepare for their journey, can provide relevant and accurate information to industry, and know their rights.

Guidance already exists on the '**One Click**' standard, and the AATFG was clear that this should be utilised to ensure information for passengers is clear, accessible and enables passengers to make informed decisions.

## **Recommendation 6: Improve access to standardised accessibility information**

Airlines and airports should implement the 'One Click' standard to enable easy access to key and specific information, to allow customers to make informed decisions. Information should include how to request and book both airport and airline assistance, available in-airport assistance services and where those are located, onboard seating and medical clearance policies, detailed guidance on the carriage of mobility aids, and recognised assistance dogs and conditions of when an accompanying person is required. The standard should also include, roles and responsibilities of the airline, the airport and the passenger.

## **Access to information before travel**

There are examples of airports developing accessibility guides to provide passengers with information on what services are available and where to find them, which passengers find helpful. The AATFG felt this should be something adopted widely across the industry to further assist passengers in accessing information they may need ahead of travel. Any such information must be accurate and kept up to date, should be easily accessible and industry should work collaboratively, where possible, to help share this information with passengers.

## **Recommendation 7: Create airport accessibility guides**

Airports should develop comprehensive accessibility guides, detailing available services, accessible facilities, wayfinding options, and how passengers can request support. These guides should ensure that Disabled passengers can navigate the airport and access all necessary facilities, services and assistance.

Making information more readily available and standardised is important, but it is also vital that information is accessible. The aviation industry is legally required to provide information in accessible formats. This includes ensuring digital accessibility meets existing guidance and standards and is user friendly. The CAA published a report in August 2023 on airline digital accessibility. This ranked performance of 11 airline websites, and highlighted that there was more work to be done to address issues with accessibility, including a lack of consistent ongoing consumer research.

## **Recommendation 8: Ensure digital accessibility**

Industry should ensure that all digital communications, including websites, mobile apps, and email are fully accessible and user friendly for all passengers. This should be in line with existing guidelines and designed and tested with a range of pan-impaired users.

## **Access to information and support whilst travelling**

For many, travelling by air can be a stressful process, especially for those who do not fly frequently. That is why the AATFG highlighted the importance of passengers being able to access assistance throughout their journey. This could be in a variety of different methods, helping to tailor the support passengers receive, and helping to support passengers for more independent journeys through the airport if passengers would prefer. It is vital that all information and methods of accessing support are kept up to date, and easily accessible for passengers.

### **Recommendation 9: Enhance access to assistance throughout the airport journey**

Airports and assistance service providers should provide passengers with mechanisms to access assistance throughout the airport. Recognising the varying sizes and operations at airports, examples to achieve this could include more staffed help desks, real-time updates via SMS, email, and in-app notifications to keep passengers informed about flight status, gate changes, and assistance options, two-way communication, and alternative methods to contact support staff when required.

## **Complaints procedures**

The AATFG recognises that consumers often find complaint processes in aviation overly complex, particularly with the various organisations involved in the



delivery of assistance. This often results in passengers directing complaints to the wrong organisation, or being “ping-ponged” between organisations. This can be very distressing for individuals, particularly if they have already had a poor experience, and can result in passengers not raising complaints or concerns. It is therefore important that the industry focuses on making complaint processes clearer for passengers, and meets its obligations to address concerns within expected timeframes.

In addition, passengers are not concerned with who is responsible for the issue, rather they just want to have their complaint resolved as quickly as possible. Industry should also ensure better coordination between organisations when dealing with complaints. For example, if a passenger raises a concern with their airline, the airline should work in collaboration with any other relevant organisations, such as the airport and assistance service provider, to provide a swift and seamless response and resolution to the passenger. Organisations may wish to consider setting up agreed processes on how they will do this for any complaints received.

## **Recommendation 10: Ensure clear passenger rights and complaints procedures**

Airlines and airports should ensure passengers have access to transparent, clear and accessible information about their rights and how to raise a complaint. This could include the establishment of a voluntary complaint resolution officer, as well as clear escalation routes.



# Theme 3 – Non-visible impairments

## Problem statement

There is limited awareness of non-visible impairments among staff and passengers which contributes to unintentional exclusion and undignified treatment. This is compounded by inconsistent behaviours, approaches and lack of use of inclusive terminology.

## Considerations and recommendations

This is an area that was raised across industry and consumers, and links closely with other areas of this report, particularly around the importance of training, information for passengers and effective communication, and ensuring support meets the needs of the individual, not a one size fits all approach.

The CAA has published guidance for both airlines (CAP 1603) and airports (CAP 1629) on assisting passengers with non-visible impairments. Industry should revisit this guidance and ensure it is followed more closely.

There was significant discussion around existing schemes such as the **sunflower lanyard** and **access cards**, and whether the use of such schemes would help improve the experience of passengers. This was an area

of split feeling, with many finding such schemes very helpful, whilst others felt uncomfortable with using them. There are multiple reasons someone may feel uncomfortable using such a scheme, but two reasons cited were cultural stigma, and safeguarding, i.e. not wanting to be identified as potentially “vulnerable.” There was also significant discussion around the potential misuse of such schemes, for example as a means of skipping queues. There is a lack of data to support whether this is the case, however, industry should consider whether improvements across the general passenger experience, such as reducing queueing, could reduce any potential misuse.

Both CAA guidance documents recommend a form of identification for non-visible impairments, although does not specify what that should be. The AATFG cannot recommend a single scheme, however, it does encourage industry to consider how the schemes can be effectively integrated for aviation. As an example, industry should be aware of the new ‘Sunflower Extra’ scheme, ensuring staff can recognise it and understand what it means, as people start to use the new feature of the scheme.

## **Inclusion of non-visible impairments**

Airports should be conducting accessibility assessments to ensure the environment is suitable for all passengers. Currently it appears these mainly focus on physical impairments, and the AATFG considers that it is important

that a full range of impairments and conditions, including non-visible, should be considered and incorporated when conducting such assessments. This should include input from their accessibility forums, which should provide pan-impairment input to ensure infrastructure and services are as accessible as possible. There are also existing standards and guidance that airports should consider as part of this work.

### **Recommendation 11: Include pan-impairment requirements in airport accessibility reviews**

Airports should ensure that accessibility reviews include considerations for diverse impairments including non-visible. These should specifically address the needs of diverse groups, ensuring that all passengers, regardless of their impairment, have access to appropriate facilities, services, and support throughout the airport journey.

### **Awareness of non-visible impairments**

The AATFG also heard that some passengers do not pre-notify or seek assistance because of fear that declaration of conditions such as dementia will result in passengers being denied boarding, or due to stigma (for example cultural) around some non-visible impairments. Providing accurate information prior to travel helps the industry to be better prepared to assist passengers, and provide a more tailored service which ultimately will be beneficial for the individual. Therefore, industry should consider means on encouraging pre-notification for all passengers

requiring assistance, but more specifically to help break down barriers for those with non-visible impairments.

## **Recommendation 12: Develop awareness campaigns to increase confidence to fly**

Industry should consider developing targeted awareness campaigns aimed at reducing the stigma and increasing confidence for passengers with non-visible impairments to ask for support. These campaigns should also educate staff and the general public on the experiences of passengers with non-visible impairments, encouraging empathy, understanding, and support.

# **Theme 4 – Mobility aids design and handling**

## **Problem statement**

Travelling with a mobility aid can be a very stressful process for many, as limited suitable onboard options result in mobility aids being stowed in the hold. This can result in damage due to handling and stowage, mobility aids not being returned to the aircraft door, or passengers being denied boarding due to battery safety requirements. This causes significant stress, inconvenience and in some cases physical harm.

## **Considerations and recommendations**

There was considerable discussion about the appropriate handling and stowage of mobility aids to help minimise the risk of damage or loss, as well as the safety requirements around batteries for powered mobility aids. There is also a significant link to other areas of this report, particularly regarding training on the handling of mobility aids and battery safety and the use of appropriate equipment to ensure a tailored service.

## **Effective communication**

There should be better efforts to ensure clearer communication between ground services, assistance providers and passengers on handling their mobility aids. Passengers should provide as much information as possible to the industry on their wheelchair or mobility aid in advance of travel, to help the industry prepare to handle the mobility aid. There should be the ability for staff to speak to passengers about their aid, ensuring appropriate questions can be asked if needed, and to provide reassurance to the passenger on the handling and safe loading on the aircraft.

The AATFG was also clear that there is a need for better availability of information to passengers, so that they can easily identify and share that relevant information about their mobility equipment with industry, for example clearer information in user guides or QR codes that could be used to provide the specific information needed.

### **Recommendation 13: Ensure clear communication with passengers about mobility aids**

Ground services and assistance service provider staff should ensure clear communication with passengers regarding the handling of their mobility aids. Passengers should be informed of the relevant rules and procedures, asked about the specifics of their mobility aid, and made aware of how it will be handled throughout the journey.

Passengers also have a responsibility to provide accurate and up-to-date information.

## **Areas for further consideration**

In addition, the sub-group had extensive discussions around airworthiness of both batteries and mobility aids. This included consideration of the standardisation of both (where possible), to help with stowage and handling, such as universal tie down points fit for air travel, battery safety and design of the aircraft hold. These discussions were held with a view to addressing a range of issues, not only mitigating the risk of damage of mobility aids, but also concerns around passengers being denied boarding or having discussions at the gate about being able to board. There is clearly a need for more work to drive improvements and innovation in this space.

### **Recommendation 14: Establish a working group on mobility aid design and handling**

The AATFG identified areas in the design and handling of mobility aids that could benefit from ongoing consideration. An industry-led group, with representation from various organisations, including manufacturers, would help sustain progress in this area.



# **Theme 5 - Tailored service and delivery**

## **Problem statement**

The increasing demand for assistance is not always matched by a tailored support service, that meets the needs of individual passengers. Current systems often fail to effectively translate customer information, and resources could be more effectively managed to provide personalised assistance.

## **Considerations and recommendations**

For passengers to be able to fly with dignity, there is a need to move towards more flexible assistance services, and for industry to focus on a needs-based approach to ensure passengers receive the support they actually need and in a way that is appropriate for the individual. This approach is best for the passenger, and will help industry to focus the right resources in the right places, whilst delivering a better service to passengers.

It is also important for passengers to pre-notify their airline to request assistance as soon as possible. This information should be shared with other organisations who support the passenger during their journey, including the airport, assistance service provider and ground



services. The more notice and information about what support a passenger might need that can be provided in advance, the easier it will be for industry to provide a tailored service.

## **Capturing passenger needs**

The evolution of assistance services that can be provided to passengers that allows industry to better provide for the individual needs of the passenger, is a complex process.

One major issue identified by the Group was the use of the codes used by industry to help identify what assistance may be required. These codes are out-dated and such binary categorisation does not assist industry in identifying what support would be best for an individual passenger. The International Air Transport Association (IATA) has set up a taskforce to review these codes.

The AATFG welcomes the update of IATA codes to better reflect the diverse accessibility needs of passengers. It is crucial to consider the perspectives of those with lived experience to ensure airlines and airports can more effectively anticipate and accommodate specific requirements.

In addition, industry is encouraged to develop tools and systems to capture and share more detailed information about passenger needs, to address this. It is also important that this information can be shared across relevant organisations supporting the passenger

throughout their journey, avoiding the need for passengers to continuously repeat information they have already provided about the support they need. This approach will also help industry to effectively manage resources, and facilitate more independent journeys, where passengers have more choice about how they travel.

## **Recommendation 15: Develop improved means of capturing passenger needs**

Industry should develop better systems to capture and communicate passenger's accessibility information, to ensure that specific needs are accurately responded to.

## **Appropriate use of resources**

Providing assistance requires significant resources, both staff and equipment. It is important that resources are appropriate for passenger need and effectively managed. Industry should consider whether other resources could be used to make the service more efficient, such as the use of airbridges, boarding ramps and autonomous equipment. In addition, there should be consideration of how existing practices could be improved, such as stand allocation for flights predicted to have high assistance requirements.

The AATFG heard that despite equipment being available, for example to assist with loading and unloading mobility aids, this is not always used. This could be for a variety of reasons, including pressures created by turn-around times, or location of equipment within the airport. However, not utilising appropriate

equipment puts both the handler and the mobility aid at risk. Industry should work collaboratively to ensure appropriate processes that enable the safe handling of mobility aids within required timeframes.

The Group also heard about experiences of passengers having to wait for assistance due to a lack of equipment or staff, or equipment being in the wrong location. There should be careful consideration of what equipment and resourcing is needed to meet the demand at individual airports, and as far as possible, careful planning and innovations to most effectively use the equipment to provide a seamless service for passengers.

It is equally important to ensure that the right equipment is being used and appropriately responds to the needs of the individual passenger. This relates to both training, to ensure staff are aware of what equipment is available and when it is appropriate to use it, as well as effective communication between staff and the passenger, on what services are available, what the passenger wants, and relaying wider considerations such as safety.

### **Recommendation 16: Ensure appropriate equipment is used**

Airports, assistance service providers and ground services should ensure that equipment and vehicles are used in the provision of appropriate assistance to passengers and handling of personal mobility aids. Equipment must have been specifically designed for these purposes and properly maintained.

# Role of the CAA

## Considerations and recommendations

There is a significant amount of guidance from the CAA and international bodies, which can be difficult for industry to navigate. Therefore, it is key that this guidance is reiterated and highlighted to help industry to ensure it is meeting the highest standards in accessibility. The CAA is a leader in providing guidance to the aviation sector, developing first of its kind guidance like those on supporting passengers with non-visible impairments, and tools to ensure organisations are meeting their regulatory requirements, like the airport and airline accessibility performance frameworks.

However, the AATFG identified some key areas of guidance that would be beneficial to re-highlight to the aviation industry and the CAA should look to reiterate this guidance through various means to help industry to understand the requirements they are expected to meet. These areas include improving use of assistance surveys, assistance request processes and booking systems, provision of assistance from one member of staff throughout the passenger journey where possible, support during flight disruptions, returning mobility aids to the aircraft door (unless requested by the passenger) and in a timely manner, no or reduced charges for

companions and assistance dogs and inclusive design of airlines and airports.

## **Recommendation 17: Develop self-assessment tool**

The CAA should create maturity matrices or requirements in legislation and guidance in the UK, which industry can use as a self-assessment tool for compliance with CAA accessibility standards.

The AATFG also identified a range of areas that may benefit from more oversight from the CAA, and a review of the CAA airport performance framework. Any review and update to guidance should include collaboration and consultation with the sector and consumer representatives.

## **Recommendation 18: Review and update existing guidance**

CAA should review and update existing guidance on CAA Airport Performance Framework (CAP1228).

## **Recommendation 19: Review and update existing oversight**

CAA should regularly review and update existing CAA oversight in these priority areas:

- standardisation of assistance dog relief areas
- standardised fit to fly forms

- impact of flight disruption on Disabled passengers
- mobility aid damage data
- airport end-to-end journey data
- training package audits
- increased use of the Airport Accessibility Forums
- inclusive design for airports and aircraft

# Good practice

Whilst there is clearly more work to be done to improve accessibility, the aviation industry has already made strides to remove barriers for Disabled passengers. Input into the work of this Group in itself demonstrates the importance industry is putting into this area of its operations, and there is a clear commitment to driving change.

This section sets out some examples of good practice and changes to help make air travel more accessible for all.

Familiarisation days at airports, enabling passengers with certain needs, such as autism, the ability to experience the airport journey ahead of their flight, providing a level of reassurance about their journey and reducing stress and anxiety.

Similarly, there are some mobility centres that provide a **Tryb4ufly service**, which offers a mock aircraft cabin, to enable passengers to experience the aircraft cabin environment, and test different types of seating postural supports.

Whilst airports are required to have an accessibility forum, this is not a requirement on airlines. However, there are examples of airlines that have put such forums in place, which enables the airlines to have direct input from their passengers, and it is encouraged for other

airlines to put such forums in place. As an alternative, airlines would be encouraged to play an active role in existing airport forums.

The AATFG also heard about a variety of innovative projects to help achieve a more tailored approach to assistance, including making self-service equipment more available to assist passengers to make more independent journeys through the airport, ways of collecting improved data and pilots to test alternative services that would alleviate the pressure on assistance services.

The AATFG was pleased to hear that the new Home Office future eGates contract includes the ability to make provision of accessible eGate capability with wider gates and larger camera range. This would help some passengers to be able to use this technology which they have not previously had access to, and may reduce the need for accessibility support through that part of the airport. The AATFG would strongly support the uptake of such eGates by airports, to help improve the accessibility of the UK border.

The CAA recently requested data from 13 airlines on mobility aid damage in 2022 and 2023. This included the total number of mobility aids carried, the total number of aids damaged, and information on the nature of damage and the remedy provided. The data provided was inconsistent between the different airlines making it difficult to compare. The CAA considers that making data



available about the transportation of mobility aids and the level of damage is in the public interest. Therefore, the CAA will be launching a consultation in summer 2025, on the introduction of a requirement for data on the handling of mobility aids to be published.

The Group reflected on the importance of industry being able to share lessons learnt and examples of good practice, to continue to improve for passengers. The CAA and DfT will continue to provide a means for industry to do this on a regular basis.

# Way ahead

The Group was also tasked with considering the way ahead, beyond the life of the AATFG and the publication of this report. This included consideration of how the recommendations could be implemented and evaluated.

To maintain the momentum of the Group, the members have recommended that an industry led aviation accessibility working group is established. Such a group would be focused on driving implementation, including continued development of pilot projects on training content, information standardisation and sharing good practice across the sector.

The working group should have a diverse membership across both industry and consumers, and to engage extensively with wider stakeholder groups, to ensure progress and to build on the strong collaboration that the AATFG has established.

Beyond the recommendations of the AATFG, a range of areas were identified that may require future regulation. Areas include enhancing the CAA's enforcement powers, strengthening **Alternative Dispute Resolution** (ADR) complaints procedures, and reviewing Regulation 1107/2006. The Department for Transport should consider these areas, evaluating the merit and need for change based on evidence and consideration of the international nature of the aviation industry.

# Glossary

**Airport Accessibility Forum** – a group convening representatives of disability groups and Disabled individuals, to be consulted by airports on assistance service quality standards, facilities and equipment, infrastructure and design, and training.

**Alternative Dispute Resolution (ADR)** – a method for passengers to resolve complaints without having to go to court.

**Assistance Service/Assisted Travel** – a free service provided to passengers by the airport, or assistance service provider, to help Disabled passengers to travel through the airport, boarding and disembarking the aircraft.

**Fit to Fly form** – for certain health conditions, passengers may be asked for proof of fitness to fly using a form or certificate completed by a medical professional.

**Ground Services** – encompasses a variety of essential functions for aircraft operation on the ground, including passenger handling to assist passengers from check-in to boarding, handling baggage and cargo and aircraft maintenance. More information on what this includes can be found at **Ground Handling**.

**Impairment** – is a condition or presentation of a difference in physiological or psychological function due to an injury, illness, or birth condition.

**In-dwelling medical device** – devices that are left inside the body, for example catheters, insulin pumps, colostomy or ileostomy bags and pacemakers.

**Lived experience** – is the knowledge and understanding gained from personally going through something. This includes living with impairments and health conditions.

**Maturity matrix/matrices** – a tool that help an organisation to evaluate their current performance and provide a clear roadmap for improvement.

**Mobility aid** – a device that helps Disabled people move around, such as, but not limited to, wheelchairs, scooters or walking frames.

**Non-visible impairment** – are impairments that are not immediately obvious, including, most health conditions. Examples include mental health conditions, hearing loss, allergies and diabetes.

**‘One click’ standard** – recommended standard of ensuring all information on accessibility is available on a single webpage or pages from a single landing page that is one mouse click from the homepage.

**Social model of disability** – a theory that states that people are disabled by barriers created by society, not by their impairments. These barriers can be attitudes, procedures, or environments that restrict disabled people’s full participation in society and gives rise to discrimination. It is the responsibility of society to be inclusive and accessible, not the disabled person to change to fit in.

# Annex A – Terms of reference

## Purpose

The Aviation Accessibility Task and Finish Group (Group) has been established to bring together the necessary skills, knowledge and capabilities across industry, consumer representatives, and people with lived experience, in relation to air travel for disabled and less mobile passengers. The Group will focus on priority areas and achievable actions to advance aviation accessibility in the United Kingdom (UK).

## Objectives

The Group's objectives are to improve aviation accessibility by:

- assessing existing and emerging evidence on key issues and barriers to air travel for disabled and less mobile passengers, while identifying priority focus areas for the Group to address during its membership term
- developing practical and achievable actions for each priority focus area that will lead to improvements for disabled passengers, which can be implemented by the industry or, where appropriate, by the government or regulator

- considering the most effective mechanisms for implementing these actions and evaluating their impact

## Scope

The Group should consider short, medium and long-term actions and ways to promote ongoing collaboration to sustain valuable efforts towards achieving long-term goals.

The Group will discuss sector-wide issues and not individual issues of the membership group.

The Group will present a recommended actions report (Report) to the DfT, that may be published on **Gov.uk**. The DfT retains the right to final decisions on content of the Report ahead of publication.

## Membership

Group members are appointed by the Secretary of State, and agree to serve a nine-month membership term, or until the dissolution of the Group (whichever comes first), unless the member becomes unable to serve, resigns or ceases to maintain the representational requirements. List of members at Annex B.

The membership term of this Group may be extended by the DfT on the authorisation of the Secretary of State.

Members are expected to represent the interests and concerns of passengers and the wider aviation industry, not just their individual organisation.

Members agree to be committed to transparency and seeking input from individuals and organisations, including advocacy groups and people with lived experience, and relevant expertise to ensure actions reflect diverse and inclusive perspectives.

Members agree to work collaboratively to achieve the objectives of the Group, to develop viable recommended actions.

Each Group member agrees to make all reasonable efforts to attend every session of the Group. Substitutes for meetings will be issued at the discretion of the Group Secretariat in advance of the meeting.

## **Chair**

The Chair will work with all members to ensure that the process runs smoothly to achieve the objectives of the Group.

The Chair will meet with the Secretary of State at the halfway point of the Group's term, to provide an update on the Group's progress.

The Chair will coordinate the production of a written update at the end of the membership term, for the Secretary of State and Aviation Minister, to sit alongside the Group's Report. The update should cover the

activities of the Group, and any further recommendations. This written update may be published by the DfT.

## **Secretariat**

The DfT will provide secretariat support to the Group, including:

- scheduling meetings
- preparing and circulating agendas and papers in a timely manner in advance of meetings
- drafting and circulating minutes of sessions to members following meetings
- capturing and circulating agreed actions and any updates
- publishing the agreed report

Any records or documentation related to the sessions may be disclosable in response to Freedom of Information requests.

## **Meeting arrangements**

The Group is expected to meet at least monthly during the membership term, with at least one to include a roundtable for wider stakeholders to input into the Group's work.

Additional meetings of the Group may be established at the suggestion of the Chair or Group.



Meetings will be held virtually or in person at DfT office locations, with hybrid arrangements made for members unable to attend in person.

## **Diversity and inclusion**

Membership of the Group will be in line with the diversity and inclusion principles in place at the Department for Transport and will endeavour to create an inclusive culture, to increase the representation of underrepresented people to better reflect the people we serve, to attract, recognise and nurture diverse talent, and to ensure everyone understands the importance of diversity and inclusion and how we all play a part in making it happen.

# Annex B – AATFG membership

Member	Role	Date
<b>Baroness Grey-Thompson</b>	Chair	November 2024 – July 2025
<b>James Fremantle</b>	Senior Manager, Consumer Policy and Enforcement, Civil Aviation Authority	November 2024 – July 2025
<b>Ann Frye</b>	Government Disability and Access Ambassador for Aviation	November 2024 – July 2025
<b>Sue Sharp</b>	Disabled Persons Transport Advisory Committee (DPTAC)	November 2024 – July 2025
<b>Michelle Kelly</b>	Head of Transport Policy, Consumer Council Northern Ireland	November 2024 – July 2025
<b>Helen Dolphin</b>	Civil Aviation Authority Consumer Panel	November 2024 – April 2025
<b>Deborah Persaud</b>	Civil Aviation Authority Consumer Panel	April 2025 – July 2025
<b>Sophie Morgan</b>	Rights on Flights Campaign	November 2024 – January 2025
<b>Roberto Castiglioni</b>	Rights on Flights Campaign	January 2025 – July 2025
<b>Carly Jones</b>	Disability Rights Advocate and Disabled Persons Transport Advisory Committee (DPTAC)	November 2024 – July 2025
<b>Anthony Jennings</b>	Disability Rights Advocate	November 2024 – July 2025
<b>John Fishwick</b>	Customer Accessibility Manager, Virgin Atlantic	November 2024 – July 2025
<b>Steve Wilson</b>	Assisted Travel Manager, Jet2	November 2024 – July 2025

<b>Member</b>	<b>Role</b>	<b>Date</b>
<b>Tracy Kennedy</b>	Director of Customer Services, Ryanair	November 2024 – January 2025
<b>Lorraine Rothwell</b>	Customer Service Manager, Ryanair	January 2024 – July 2025
<b>Xavier Mascarell</b>	Customer Accessibility Strategy Manager, British Airways	November 2024 – July 2025
<b>Wallis Harvey</b>	Accessibility Specialist, easyJet	November 2024 – July 2025
<b>Paul Scott</b>	Terminal Assurance Manager, Glasgow	November 2024 – July 2025
<b>Stephanie Putt</b>	Accessibility Manager, London Stansted	November 2024 – July 2025
<b>Ed Kibblewhite</b>	Passengers with Reduced Mobility Contract Manager, Manchester Airport Group	November 2024 – July 2025
<b>Chris Drury</b>	Customer Services Manager, East Midlands Airport	November 2024 – July 2025
<b>Calum Glazier</b>	Head of Assistance Services, London Heathrow	November 2024 – July 2025
<b>Samatha Saunders</b>	Head of Assisted Services, ABM Aviation UK Ltd	November 2024 – July 2025
<b>Liz Boadella Burton</b>	Head of Product and Passenger Experience, Wilson James	November 2024 – July 2025
<b>Mark Chambers</b>	Operations Director Airport Services, OCS	November 2024 – July 2025
<b>Linda Ristagno</b>	Assistant Director External Affairs, IATA	November 2024 – July 2025
<b>Julia Ogiehor</b>	Policy and Trade Relations Manager, ABTA	November 2024 – February 2025
<b>Luke Petherbridge</b>	Director of Public Affairs, ABTA	February 2025 – July 2025
<b>David Leighton</b>	Director, Aviation Services UK	November 2024 – July 2025

<b>Member</b>	<b>Role</b>	<b>Date</b>
<b>Robert Griggs</b>	Policy and Public Affairs Director, Airlines UK	November 2024 – July 2025
<b>Christopher Snelling</b>	Policy Director, AirportsUK	November 2024 – July 2025

# Annex C – Engagement

The Group engaged across a range of stakeholders, so that considerations included a variety of views and ideas, and to ensure its work in identifying recommendations was robust. Engagement included:

- one-to-one meetings between the Chair and individuals with lived experience and organisations representing Disabled passengers
- two consumer roundtables hosted by the Chair
- industry workshops for airlines, airports, and travel agents
- one-to-one meetings between the secretariat and various aviation and accessibility related organisations
- one-to-one meetings between the secretariat and the Devolved Administrations
- representatives from various organisations, including charities, and aviation businesses, meeting with sub-group leads and attending sub-group meetings
- representatives from organisations joining main AATFG meetings to discuss specific issues and ideas

The AATFG would like to thank all those who engaged with and contributed to the Group's work, helping to formulate a clear picture of the barriers across the aviation journey, considerations to make improvements for all Disabled passengers, and developing the recommendations to help drive those improvements.