



The voice of blind and partially sighted people in Europe

Most frequent problems experienced by blind and partially sighted persons when travelling by air

EBU report in collaboration with our German member DBSV
(August 2019)

About this report

Regulation (EC) 1107/2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air (“the Regulation”) and the interpretative guidelines to practically implement it, largely facilitate the travel experience of blind and partially sighted persons and provides them with a growth of autonomy and self-determination.

The object of this report, however, is to highlight the most frequent problems for blind and partially sighted persons when traveling by airplane. It covers all aspects ranging from flight booking, location of the assistance service counter at airports, the quality of assistance services from check-in, to embarking of the aircraft until the final departure from the airport to the respective travel destination. Further it describes upcoming difficulties in accessing the inflight facilities and the hurdles in taking assistance and guide dogs as well as other assistive and medical devices on board of an airplane. The report also lists possible legal and practical proposals to mitigate or solve the outlined difficulties and access barriers.

The report is **based on a survey conducted by our German member DBSV among EBU national member** organisations in the EU. Respondents from the following countries participated: Belgium,

Czech Republic, Denmark, France, Germany and Netherlands. The survey was also disseminated by DBSV among its national network, resulting in 70 replies from blind and partially sighted individuals and 4 replies from regional self-help organizations.

Executive summary

- An independent booking of flights is barely possible for blind and partially sighted persons. Most websites and mobile Apps of airlines and tour operators are inaccessible and a proper usage, allowing an autonomous flight research, flight selection, declaration of assistance needs and subsequent payment of selected flights and services is therefore not possible.
- Designated areas and counters for the reception of assistance at airports are often not well located and difficult to find quickly and autonomously, although they are crucial for blind and partially sighted travellers, leading to uncertainty, frustration and in the worst case missed flights and extra expenses.
- Many disabled passengers are obliged to be escorted by a wheelchair regardless of their physical constitution. Refusing such treatment will often lead to interrupting or ending the assistance service. Moreover, the behaviour of the assistance staff towards disabled customers is at times inappropriate, patronizing, overprotecting and prevents them from making own and well informed decisions concerning their mobility within the airport and the usage of available airport services and facilities.
- Apparently many airports are understaffed to deal with assistance requests, leading to cases where passengers with disabilities are simply 'forgotten', i.e. the assistance does not show up in time.
- Existing airline policies are invoked to refuse the embarking of guide and assistance dogs. Additionally, blind and partially sighted passengers are not informed of this restriction prior to their purchase of the ticket or the departure date, which does not give them the opportunity to consequently choose another airline and flight.
- Disabled passengers using regional, medium or long distance trains or buses to reach their respective airport are often confronted with the lack of assistance at bus or train stations, and to find the designated assistance counter at the airport.
- During flights, cabin staff often does not feel obliged to guide a blind or partially sighted person to and from the toilette nor explain any safety facilities like the location of emergency exits,

the storage and use of life jackets or the call button to request the support of the cabin-crew.

- Instead, many airlines request disabled passengers to occupy a window seat in order not to hamper the evacuation of the aircraft – which contains a discrimination and at the same time further isolates these passengers and complicates their obtaining the needed attention.
- On-board services and facilities (touchscreens, internet services, etc.) are still too often not accessible for visually impaired passengers

This report formulates a list of recommendations for a possible revision of the Regulation.

Accessibility of websites and mobile apps of airlines, travel agencies, airports and other tour operators

All 50 German survey participants have reported about the inaccessibility of websites and mobile Apps of air carriers, airports and other tour operators. All of them were unable to independently pursue the complete booking process on their own. They had to rely on the support of relatives/family/friends or to draw on the services of travel agencies or air carrier hotlines, often on extra expenses. Depending on the air carrier or airport some websites are entirely inaccessible, whereas others can be navigated and used to a certain extent, but failing in providing an entirely accessible information and booking platform. There are surely a few salient websites allowing accessible usage for disabled users, but the majority fail in delivering fully accessible web contents.

Major inaccessible features are:

- The customisation of the web content according to visual aspects like font type, size and contrast;
- The filtering of criteria based e.g. on pricing, air carrier, sort of flight (direct, open jaw flight);
- The selection of departure and return flight date.

Many interferences concerning restricted or omitted accessibility can be found in the basic structure of the website interface. Lack of labelled headings, lists and tables, no description of graphics, automated and constant updates of the content including pop-ups of

advertisements, faulty coding etc. constitute some reasons for the inaccessibility of website content.

Survey participants reported that air carriers often argued that there is no compulsory legal accessibility requirement in place, entitling them to create accessible and universal websites. In fact only recital 13 of the Regulation and Article 4 (Derogations) §3 are referring to the need of provision of information in accessible formats. These provisions are not sufficient to ensure the full accessibility of websites and mobile Apps. Binding accessibility provisions underpinned by EU accessibility legislation and accessibility standards such as WCAG 2.0, EN 301 549 V1.1.2, and accessibility requirements of the currently adopted European accessibility act need to find their way into the revision of the Regulation and its interpretative guidelines.

We believe that only mandatory and enforceable minimum accessibility requirements will lead to a greater accessibility of websites managed by tour operators, airports and air carriers, benefiting the society at large and providing gateways to independent and self-determined travel of thirty million visually impaired Europeans.

Accessibility of designated points at airports for a request of assistance

A quarter of German survey participants reported that they had trouble in locating the designated airport counter to request and receive assistance. Relevant information can rarely be found on websites of airports and airlines. Some airports like Bristol and Dublin position service staff directly at the entrances of the airport which immediately gets in touch with all obviously disabled or mobility restricted persons and guides them to the respective counter. Berlin TXL airport provides a phone number enabling passengers to notify the assistance service in advance of their arrival. The informed staff will pick you up from your point of arrival. Other airports do not offer such services and/or have no visible, tactile or acoustic cues facilitating the location of the assistance counter.

A quote from a German respondent illustrates this: “Whereas the airport staff in the US or Ireland and UK welcomes you already at the entrance of the airport with warm and encouraging words, the

staff at the general info desks of some German airports have no comprehension and knowledge how to support one as a disabled person, and will tell you things like: «This is not my business I am not working for the airline» or: «How do you imagine to get assistance from here?» As a blind passenger it is impossible to find the existing call buttons to request an assistant via internal airport phone. Even sighted passengers whom I asked for help could not find them.”

EBU acknowledges and appreciates the efforts of the European commission and EU members to increase the accessibility of their airports. A fruitful and honourable example of demonstrating the need and availability of accessible airports is the Access Award for airports launched by the European commission. Airports like London Gatwick and others have been awarded and thus demonstrated compliance with legal accessibility requirements of national and EU provisions. Nevertheless EBU believes that increased international exchange of best practices and further strengthened legal provisions are needed to gradually and progressively enhance the accessibility of European airports.

The current provisions of the Regulation (Recital 11 and Article 5 Designation of points of arrival and departure) are still not ambitious and strong enough to achieve consistent and uniform accessibility in all European airports. They mainly refer to the accessibility of information or appeal merely to the goodwill and interpretation of managing bodies to consider accessibility while undertaking refurbishment measures. Particularly access points for assistance should be accessible and easy to locate. Uniform national or EU wide phone numbers to request and direct assistance service to a respective location (entrance, metro station), staff at the entrances of terminals to guide disabled passengers to the designated counter, tactile and visual guidance systems leading to the assistance counter, acoustic and recurrent announcements informing about the location of the assistance counter as well as clear and accessible information, providing comprehensible and comprehensive directions available on airports' and air carriers' websites and mobile Apps, should be minimum accessibility requirements which need to be embedded into recast of related regulations and guidelines to accomplish a satisfactory level of accessibility at all European airports which will greatly enhance the independence and mobility of visually impaired travellers.

Transportation, independence and provision of information

Blind and partially sighted survey participants are generally very satisfied with the quality of the assistance services at European airports. They feel that they are treated with respect, dignity and courtesy. The Regulation has allowed increased mobility and independence for visually impaired travellers. Since the survey aimed at identifying problem areas, many participants have however mentioned some negative experiences. It is difficult to assess if these aspects can be observed and counted as generic patterns, since they were reported by the majority of participants it might be worth considering them in future recasts of the regulation and related EU policies.

However, the following two aspects deserve to be mentioned:

All survey participants have repeatedly reported that they were requested by their assistants to **use a wheelchair while being escorted and guided through the airport**. Denial of this request sometimes resulted in the cancellation of the assistance service or aggravated its performance, since the assistant had to guide a person and additionally push an empty wheelchair. Blind and partially sighted passengers were told, that internal policies mandate this way of transportation regardless of the physical constitution of those concerned.

Some participants suspect that subcontracted companies tasked with rendering the assistance service, may receive a higher lump sum for passengers eligible for wheelchair conveyance. Time savings and a presumed eased handling of disabled passengers by the service provider, might be the rationale behind internal airport policies. In any case, the problem is certainly connected to the fact that many airline websites make it impossible to specify one's disability when expressing assistance needs, and only provide a checkbox enabling the user to select between disabled or non-disabled and to indicate whether a walker/assistant is required. This leads to the misconception that all disabled passenger need a wheelchair to commute through the airport facilities.

Article 7 of the Regulation says that the assistance "shall, as far as possible, be appropriate to the particular needs of the individual passenger." And the interpretative guidelines for the application of

the Regulation clearly express that the assistance should be proportionate and adapted to the individual requirements of the person concerned. Indeed, the guidelines also say that “assistance providers are allowed to adapt the level of their service to each situation following a case by case analysis”, however EBU would like to emphasize that the opinion and the consent of the concerned person with disability should always nevertheless be considered and respected. In some reported cases this consent was implicitly assumed and the concerned passenger was not even informed and more or less pushed on to the wheelchair seat.

Some survey participants have also expressed their discontent with regards to the **quality of communication and information in the assistance service**. This is illustrated by the following quotes, respectively from Denmark and Germany:

“In some, especially German airports, I (/passengers) with a disability are in a fairly "militaristic" manner set in one of these special centres especially designated for such special cases - persons that due to language or disability need assistance. The general ambience there is often quite cold or unfriendly, you are basically sat down and told that they will come and get you when it is your turn. Any requests regarding opportunity to purchase something, i.e. duty-free, to eat or drink, is often denied. If you need to go to the bathroom, this can be accommodated but often in a stressful manner.”

“In 2010 I was flying to Turkey. At the Turkish airport the staff simply pushed me on to the wheelchair and shuffled me through the airport in silence. No one told me what, how and when my journey will be continued. I was sitting for hours in the wheelchair. After hours I was suddenly and abruptly directed and put into a big windowless container, similar to a shipment container and lifted up into the aircraft. All of this without my consent and any advanced provision of information. Often I feel rather treated like luggage than as a human being. Assistants should tell us things like: “Please wait here for about an hour, can I bring meanwhile a coffee or show you a respective place, now I (Assistant) am back, our journey continues and our next destination is...””

To avoid situations as depicted above managing bodies of airports should be careful to constantly monitor and update their quality standards for service provision, as stated in Article 9 of the Regulation, and ensure that all internal staff and subcontracted

companies in charge of the task, receive appropriate training, including periodic refresher trainings, as stated in article 11. The training should be person-centred, putting the focus on attitudinal transformation in terms of the perception of disabled persons. The trainees should learn to understand that disabled persons are human beings, with individual needs and attached human rights which should be preserved and protected. Particular attention should be given to the accomplishment of the legal requirement that mandates airport managing bodies to conduct such training in close collaboration with organizations representing disabled persons. To comply with this provision is key to secure training contents and its pursued practical implementation tailored to the needs of disabled passengers.

Many participants have reiterated that they sometimes had almost been **forgotten to be picked up** from the assistance services at the gate for embarking or in the airplane to disembark. Some of them had to wait for several hours in the aircraft or outside, which created frustration and anxiety and led to unpredicted consequences, like missing of connecting flights or other scheduled appointments. Some survey participants described that according to narrations of the assistance staff, many airports may struggle with the influx of requests posed by disabled and mobility impaired persons to receive assistance. It is likely that some airports are simply understaffed.

Staff policies and wage adjustments as well as contracts with external companies undertaking the assistance service, should be annually monitored and adjusted. Staff savings should never happen on the expenses of disabled passengers. A sensible compliance of the stipulations of the Regulation can only be ensured if sufficient financial and human resources are available.

Assistance and guide dogs on board of an aircraft

All four interviewed blind associations have reported a range of cases where blind passengers were either prohibited to take their assistance/guide dog on board or boarding was conditional upon the payment of an extra fee. This is an evident breach of Article 7 of the Regulation.

Many airlines request a special **certificate that the dog is a trained assistance/guide dog** (service animal). Unfortunately certificates

greatly vary from country to country, no EU wide uniform rules and templates exist and some airlines are reluctant to accept certain national certificates. In Germany for example no legally binding country wide certificate of eligibility exists. The German federation issues such certificates upon request and every guide dog training centre issues additional certificates. Some airlines only accept certificates of those training centres which are an official member of the International Guide dog Federation. In Germany only 6 training centres have obtained an official membership with the effect that for Example Easyjet and Ryanair deny boarding of assistance/guide dogs which have not been trained by the German International Guide Dog-Federation schools. Due to numerous existing trainings centres in Germany and across Europe, this internal policy creates an unjustifiable and discriminatory barrier for visually impaired guide dog users intending to travel by airplane.

Other reported challenges concern the necessary **formalities to register an assistance/guide dog**. Every airline has established different rules, which are often not easy to explore. Some airlines for instance provide a dedicated phone number, others have a web-based template to register; other airlines do not display any useful information. The enrolment of an assistance guide dog is often connected with a great range of obstacles and challenges which urgently need to be dismantled.

The introduction of an EU wide applicable certificate for all guide dogs, no matter in which school they have received their training and with which airline the blind passenger intends to fly, is essential to abolish unfair and discriminatory treatment by air carriers. Further uniform enrolment procedures should be in place, which guarantee a swift and accessible registration process for all air carriers. Air carriers and its staff should receive proper and periodic awareness raising training about the nature, purpose and the legal entitlements in relation to their air travel.

Quality of assistance and internal policies during and of inflight services

The majority of the survey participants have expressed their satisfaction with the performance of the cabin crew. They do feel taken care of and well instructed. Despite these positive remarks, some of them have highlighted troubling aspects, which have an adverse effect on their travel experience.

Many participants did not receive any proper introduction to the **safety features** (emergency exits, call buttons, position of life jackets and oxygen masks) and toilette facilities of the aircraft. This negligent omission may lead to frustration and fear of the blind and partially sighted participants, since they do not have a proper image of the aircraft which prepares them for a possible emergency scenario.

Some participants of the survey reported that they were requested to occupy a **window seat**, due (as reported about KLM and Lufthansa for instance) to internal air carrier policies. Some felt restricted in their freedom of making their own choice and others felt this affected the quality of the service. A quote from EBU member from Denmark may serve as an example:

“Having aisle seats is often the best in order to communicate with the flight assistants. Sitting at the window you are as a blind person often overseen and with closed eyes you are assumed sleeping and hence are passed with beverages etc.”

Accessibility of on-board facilities

All survey participants have raised concerns about the accessibility of the facilities on-board of the aircrafts. Namely:

- Most are equipped with inaccessible **touchscreens**. The entertainment program as well as the activation of light and the request of a member of the cabin crew, can be carried out via finger gestures tabbing on the appearing elements on the screen. Unfortunately these touchscreens are neither equipped with a screen reader, converting the displayed text into speech nor with magnifying and other font changing features, which would allow partially sighted persons to use them.
- Blind and severely partially sighted participants are often prevented from using the **inflight internet services**. The websites and mobile Apps to connect the Laptop or smartphone are often inaccessible and cannot be navigated and used by them.
- There are no Braille labels and magnified **seat numbers** on the seatbacks to allow the location of your seat. Especially at long and medium distance flight this may lead to situations, where feelings of disorientation and fear may arise.

-
- Many blind people also find it difficult to locate the **flush button in the toilettes**, which forces them to request the help of the cabin crew or other passengers.

Some airlines provide exemplary tactile layouts of the aircraft and invest sufficient time to show the passenger around.

This behaviour should be common practice for all airlines. A Czech participant tells of his pleasant experience of a Stewardess showing him around and giving him a try at opening and closing the door covering the emergency exit, with the explanation, that in an event of a blackout, he would be the only passenger ready and able to orient himself in the dark and open that door.

The current soft provision in the Regulation (see Recital 11) is insufficient to establish the legal ground for a progressive and continuous accessibility of aircrafts. Mandatory provisions are needed to accomplish any improvement in this domain. The provisions of the newly adopted European Accessibility Act with regards to accessibility requirements of consumer terminal equipment used for accessing audio-visual media services need to be incorporated into any refurbishment interventions and newly designed aircrafts. Though the provisions of the Accessibility Act only have to be practically applied by 2025, aircraft manufacturers should already be committed to include them into their aircrafts.

Assistance in intermodal transport modes

The majority of the German survey participants have reported difficulties in obtaining **assistance from train or bus stations to nearby located airports**. Often it was not clear who would provide assistance. Some airports have included internal clauses in their policies, allowing assistance service staff from the airport to commute between airport and train or bus station to pick up disabled or mobility impaired person. Other airports and managing bodies of stations argue, that no legal provisions exist and thus offer no in-between assistance service.

This unclear legal situation has led to various annoying incidents for visually impaired travellers. Some participants could not reach the airport on time and missed the flight, others had to argue with station and airport managers to claim their right for assistance and others do not feel encouraged anymore to use intermodal transport options while traveling.

An overarching passenger rights regulation is urgently need to cover assistance and other related human rights in relation to the usage of intermodal transport modes for disabled travellers.

Recommendations

Participants in our survey formulated various recommendations in order to facilitate their air travel experience. Below is a compilation which hopefully may serve as food for thought **for any envisaged revision of the Regulation**:

- All websites of air carriers operating within the EU and of airports located in the EU need to be fully accessible taking into account EU wide and international applicable technical accessibility standards.
- The websites of airports and air carriers should have special sections containing all relevant information for persons with disabilities, including accessible forms to book assistance and to distinguish between different disabilities.
- Assistance between public transport stations and nearby airports needs to be legally and practically implemented on an EU wide level.
- All airport info desks should be aware of the Regulation and about the procedures to assign assistance for disabled persons.
- Every assistance service needs to have a phone number, which can be accessed at all times.
- A fixed time limit for delays in the reception of assistance should be set up. If the time has been exceeded the concerned passenger should have the right for compensation.
- Disabled passengers should have the right to choose how they wish to get through the airport: A wheelchair should not be imposed and blanket allowances should be not depend on the transportation mean.
- Call buttons in aircrafts and at airports need to be tactile discernible.
- The cabin crew needs to proactively introduce the position of the call button to disabled passengers.
- Passengers with a need for assistance should have the right to select their preferred seat (excluding emergency exists).
- Aircraft on-board facilities, like call buttons, entertainment services, flushing buttons, etc., should be accessible

- All air carriers should make available tactile aircraft layouts and their safety rules in Braille and big print.
- A uniform EU-wide applicable certificate needs to be put in place, to allow to bring assistance and guide dogs in aircrafts.
- Assistance staff, ground staff and cabin crew should be properly trained by disabled persons to have a positive mind-set towards disabled persons.

About EBU

The European Blind Union (EBU) – **Interest Representative Register number 42378755934-87** – is a non-governmental, non-profit making European organisation founded in 1984. It is one of the six regional bodies of the World Blind Union, and it promotes the interests of blind and partially sighted people in Europe. It currently operates within a network of 41 national members including organisations from 27 European Union member states, candidate countries and other countries in geographical Europe.

European Blind Union

6 rue Gager Gabillot - 75015 Paris
ebu@euroblind.org | www.euroblind.org

Contact: Antoine FOBE, Head of Campaigning
ebucampaigning@euroblind.org