

Aviation 2050 - The Future of UK aviation

Response from Transport Focus

1. Introduction

Transport Focus is the independent, statutory consumer organisation representing the interests of bus, coach and tram users across England (outside London), rail passengers in Great Britain and all users of England's motorways and major 'A' roads (the Strategic Road Network).

2. What can Transport Focus Offer?

Transport Focus welcomes the proposal to extend our remit to act as a representative body for air passengers. Transport Focus staff and Board members already have experience in the air sector. Jeff Halliwell, our chair, is also chairman of Airport Co-ordination Limited and chairs the Heathrow Consumer Challenge Board. Keith Richards, one of our board members, is the current chair of the Disabled Persons Transport Advisory Committee (DPTAC) and is the ex-chair of the Civil Aviation Authorities Consumer Panel. Anthony Smith, chief executive, has just been asked to join the Heathrow Area Transport Forum and was a member of the CAA Consumer Panel for six years.

Transport Focus can offer:

- An independent consumer voice with multi modal expertise
- A collaborative approach with stakeholders to ensure maximum impact on decision makers
- Perspective informed by experience of working for bus, coach, and tram passengers for over a decade, and for road users since 2015
- An evidence-based approach that will enable an effective, useful start in a new sector (and could inform the White paper and subsequent policy)

Transport Focus has consistently argued that users should not be the passive recipients of major decisions made on their behalf¹. We have previously set out opportunities for increased engagement with passengers in strategic planning, implementation and monitoring. This approach could be readily adapted in relation to major decisions affecting air passengers. There will always be instances where commercial interests do not match passengers' aspirations; where airlines and

¹ [Williams Rail Review: what do passengers want?](#) Transport Focus. January 2019. [Appendix 5](#) sets out opportunities for greater passenger engagement in strategic planning, implementation/delivery and monitoring

airports cannot act as an effective proxy for passengers. It is essential to involve those who actually use services in the planning and delivery of those services.

It is absolutely right that the industry seeks out and listens to the views of individual customers. However, it can be too easy for these individual voices to be side-lined and marginalised. Consequently, there is a continued need for professional, independent consumer representation which can sit alongside direct engagement, and which can capture, collate and amplify the passenger voice². This was also recognised by passengers themselves in research conducted by Transport Focus on the structure of the railway, as seen in our response to the Williams Review³. In addition, see Annex A which shows how Transport Focus has created opportunities for greater passenger engagement in strategic planning, implementation/delivery and monitoring in the rail industry.

User representation is not a new concept. There is a long tradition of consumer representation in Great Britain, much of which can be traced back to the post-war nationalisation agenda. This was reinvigorated during the privatisation programme in the late 1980/90s where statutory consumer bodies were established for most of the network utilities (gas, electric, water, telecoms, royal mail). On rail, statutory passenger representation began in 1947 – although this also changed radically with privatisation.

Statutory rail and bus passenger representation has been in existence for over 70 years and some of the principles and experiences honed over that time are applicable to any new form of transport user representation and consumer representation generally. The model of representation has changed several times over the years, but Transport Focus believes that its fundamental need and value has remained constant. Based on years of dedicated passenger representation, this brief papers sets out some of the key principles that underpin consumer representation and some of the benefits arising from it. Examples of how this is currently being put into practice can be seen in Transport Focus's workplan for 2019-20.⁴

This submission focuses on the principles of passenger representation- and uses our research as a guide to where we may be able to add value. We have picked up on particular areas of the consultation document where we have appropriate research and experience. The intention of our response is to ensure that passenger representation is built into any reform of the aviation, whatever shape or form this ends up taking.

² Are statutory passenger watchdogs effective in representing passenger interests in public transport? Vu Thi Tao, Philipp Wegelin, Widar von Arx. Lucerne University of Applied Science and Art. 2017.

³ [Research debrief: Passenger input into the Rail Review](#). Transport Focus. 2019

⁴ [Transport Focus workplan, 2019-20](#), Transport Focus, 2019

3. A Multi-modal approach

Transport Focus believes that a multi-modal approach to passenger/transport user representation will bring benefits to users. In 2009, passenger representation of bus, coach and tram was added to our existing duties for rail passengers. More recently, users of England's motorways and major 'A' roads, the Strategic Road Network (SRN) were also included.

Transport Focus now has a much greater focus on door-to-door journeys rather than the more traditional approach of looking at transport as a series of separate silos. This has been especially useful when looking at things like journey planning, provision of information and coordinating connections. It has also facilitated the identification and spreading of best practice between modes. For example, by analysing the results of the rail⁵ and bus⁶ passenger satisfaction surveys, Transport Focus can compare and contrast the experiences of passengers with a disability between modes. Another example includes comparing the ways in which Highways England and Network Rail manage major engineering works and how these organisations communicate with users during this disruption.

We believe that there could be similar synergies and benefits with air passenger representation, not least given that every passenger at an airport will have used another transport mode to get there.

This multi-modal approach appears particularly important as the statutory Heathrow Airport Consultation has commenced. The large scale of the works at and around Heathrow, including diverting the M25 and improved public transport hubs, lends itself to a joined up, multi-modal approach. Transport Focus' in-depth experience of helping the rail and road industries handle large scale planned disruptions will be of value. At present we are working on the engineering works around Kings Cross, building on earlier work at Derby, Waterloo, Liverpool Lime Street and elsewhere.⁷ We are also helping highways England with roadworks associated with the roll out of the Smart Motorway programme – our latest work is on the M4 upgrade.⁸ We also employ stakeholder managers, some of whom work multimodally, linking up with specific Train Operating Companies, Highways England Areas and also bus companies, with a focus on the on-the-ground user experience.

⁵ National Rail Passenger Survey ([NRPS](#)). Transport Focus.

⁶ Bus Passenger Survey ([BPS](#)). Transport Focus.

⁷ [Putting Passengers at the heart of engineering work](#), Transport Focus, October 2017

⁸ [Upgrading the M4 to a smart motorway](#) – road users views, Transport Focus, May 2019

4. Air passenger priorities for improvement and satisfaction

Transport Focus carries out work on user priorities for improvement on all the modes we work on.⁹ This work is a key building block in understanding where users want to see investment and operations focused. This work has been influential in helping governments and the transport industry prioritise investment in the rail spending Control Periods and the Road Investment Strategy 2.

As part of understanding how Transport Focus's business model could be applied working for air passengers we have carried out, using our on-line Transport User Panel a survey on air passenger priorities for improvement. While this does not necessarily provide a fully representative sample the Panel does provide a good geographic coverage.

The nearly 3000 respondents to this question provided some useful indicators:

Boosting the voice of air passengers

Q Based on your experience of air travel to or from the UK, which three of the following most need improving?

 Passenger priorities for improvement	(%)
GOING THROUGH SECURITY AT UK AIRPORTS	43
GETTING TO AND FROM AIRPORTS IN THE UK	33
PASSPORT CONTROL / IMMIGRATION AT UK AIRPORTS	32
THE VALUE FOR MONEY OF GOODS AND SERVICES AT UK AIRPORTS	28
THE BOARDING PROCESS	26
FEWER DELAYS TO FLIGHTS	23
BAGGAGE COLLECTION AT UK AIRPORTS	18
CHECK IN AND BAG DROP AT UK AIRPORTS	16
THE VALUE FOR MONEY OF FLIGHTS	12
THE ON-BOARD AND IN-FLIGHT EXPERIENCE	10
THE QUALITY OF SHOPS, RESTAURANTS AND SERVICES AT UK AIRPORTS	9
THE HANDLING OF COMPLAINTS	6
THE PROCESS OF BOOKING THE FLIGHT	3



The airport experience stands out as an area that passengers would like to see more focus on as well as fewer delays to flights.

⁹ Priorities for improvement – for [rail](#) and [bus](#) passengers and for users of the [Strategic Road Network](#).

Through our work on user satisfaction with Motorway Service Areas (MSA), Transport Focus has demonstrated that we can deploy our insight knowledge and skills in areas of mixed transport/retail/catering use. This survey is fully funded by the MSA providers which demonstrates its worth in benchmarking and driving change¹⁰.

The Civil Aviation Authority publishes the Aviation Consumer Survey. This contains extremely useful information about passengers' satisfaction with their last flight. While many factors have remained relatively steady over time there has been a decline in satisfaction with the airport experience in the UK and the overall travel experience. This is perhaps not surprising as passenger numbers have risen while airport and runway capacity have lagged behind. This indicates that increased focus on the airport experience would be welcomed and noticed by passengers.

5. Passengers Charter

One of the main passenger facing proposals in the consultation concerns the development of an air passengers charter.

The rail sector has had passenger charters for some time - the first one dating back to the early 1990s. Transport Focus is routinely consulted on each charter and over the years we have identified a number of learning points that we feel will be applicable for air. These are listed below:

1. Be clear about the status of the charter.

Our experience to date highlights the value of pulling together key rights and promises from the 'contract' (the National Rail Conditions of Travel), from the franchise agreement, and from regulatory documents covering disability and complaints handling into one convenient place.

However, it is really important to be clear about the role and status of the document from the outset. For instance:

- is the charter simply intended to be a summary of existing rights/obligations?
- will the charter have any legal standing in its own right - for instance if something new is added to the charter will it create a new legal obligation?
- will the charter include performance targets and if so, will these be 'aspirational' or just reflect minimums? Would these targets be binding?
- will there be just one national charter or is it intended that different airlines/airports can use the charter to 'compete' with each other – i.e. to offer service levels beyond the industry standard? Alternatively, will this competitive element be addressed through separate performance reports that benchmark service providers?

It will be essential that the charter is clear between what are enforceable legal rights and what is aspirational. If this isn't the case, then there is a risk that it will raise false expectations among passengers which will damage trust and consumer confidence.

2. Content

¹⁰ Motorway Services user survey ([MSUS](#)), Transport Focus.

A good rail passenger charter provides relevant information on targets and obligations and acts as a signpost for where additional information can be found – it should not become a marketing brochure.

Our experience with rail suggests that the key information covers:

Compensation

- a clear statement of rights and any exclusions to those rights
- how such compensation would be payable
- details on how to submit a claim and to whom they should be made – i.e. the airline, the airport, the retailer?
- the position on consequential loss (e.g. missed connections, lost bags etc)
- the existence of any other statutory consumer rights (as distinct from industry specific/regulatory rights)

Accessibility / PRM requirements

- a statement of rights and standards
- how to request assistance and any relevant timescales
- redress if assistance not met and how to claim

Complaints

- who to contact and standard response times?
- details of any passenger representative body
- details of any Ombudsman/ ADR scheme available

Managing disruption

- any obligations/requirements to inform passengers of a change to scheduled services
- any commitments to keep informed about delays to a service
- any obligations re alternative transport provision
- Safeguarding- ie: a commitment to look after people/get them home/overnight accommodation

3. Governance

It is important that the charter document remains up to date and relevant. To that end it will be important to have clear roles and responsibilities from the outset. This includes:

- Who is responsible for writing the document?
- Who signs it off?
- Who monitors compliance/delivery?
- Who produces copies/ensures that it is publicly available?
- How it is to be made available/publicised - prominence on websites, posters?
- What consultation is required / who is entitled to be consulted? (currently train companies must consult Transport Focus and London TravelWatch)
- How frequently it is to be reviewed/re-issued?

- It also may be a good idea to test the charter with passengers- get them to read through it and give comment and feedback about readability and quality of information.

6. Accessibility issues

Transport Focus has extensive experience representing disabled passengers and focusing on accessibility issues, as well as hidden disabilities. Key activities which Transport Focus undertakes are:

- commenting on train company draft Disabled Persons Protection Policies,
- holding an Accessibility Forum two times a year
- promoting the need for formal training of staff about users with disabilities in our regular discussions with operators and industry organisations
- closer analysis of our main surveys with a particular focus on the responses of disabled users to highlight where future work is needed.

One of Transport Focus's Board Members, Keith Richards, is currently also the chair of the Disabled Persons Transport Advisory Committee.

Last year we carried out ground-breaking work on the experiences of disabled users of the Strategic Road Network¹¹. Many issues were highlighted from this previously under-researched area. These include disabled users feeling a heightened need to plan for journeys, their concerns about breaking down, a lack of information and being caught in traffic tailbacks as well as the poor user experience of fuel retailing. The report is already driving change in the way that assistance calls from disabled road users are dealt with, how help during disruption is given and increasing the focus on the needs of disabled users at service areas.

7. Surface access to airports

Chapter four of the consultation asks about surface access strategies.

Transport Focus' existing remit gives a good insight into the needs and aspirations of both public transport and road users. This includes customer satisfaction¹², what drives satisfaction and dissatisfaction, and priorities for improvement¹³. We also have a good understanding of how people decide which mode to take and the barriers that deter people from using public transport¹⁴. This combined knowledge helps provide a good base for understanding how to influence surface access to airports.

¹¹ [Disabled User Experience an accessible road network on England's motorways and major A roads](#). Transport Focus, November 2018

¹² Transport Focus runs large scale satisfaction 'tracker' surveys for [rail](#), [bus](#), [tram](#) and users of the [Strategic Road Network](#). We also conduct research ranking priorities for improvement – for [rail](#) and [bus](#) passengers and for users of the [Strategic Road Network](#). Details are on our website: www.transportfocus.org.uk

¹³ [Tomorrow's rail passengers: understanding how to make rail travel more attractive to infrequent and non-users](#). Transport Focus. April 2018

⁹ [Williams Rail Review – Barriers to travel: How to make rail more attractive to infrequent and non-users](#). Transport Focus. April 2019

Moreover, in March 2019, we published a report looking specifically at surface access to airports in general and views around coach use in particular¹⁵. This report was carried out in partnership with Heathrow Airport and the Department for Transport and we are continuing to work closely with both of these organisations in implementing the report findings. The report highlighted the importance of reliability and flexibility – can users depend on their chosen mode of transport to get them there on time? Additionally, users wanted clear costing information. Similar themes of cost and convenience also run through our research into barriers to using rail.

Another common barrier to using public transport surrounds a lack of basic ‘awareness’. Far too many people simply do not know where to start with public transport, including basic questions such as: how to plan a journey, how to plan a multi-modal journey, how to buy a multi-modal ticket and how much will it cost? At such times the car becomes the default mode. This was also reflected in our coach research.

The consultation document suggests that these are relevant themes for the aviation sector.

8. Managing disruption

Figure 18 from the consultation document (page 113) refers to the timely provision of information during disruption and/or cancellation of planes.

This is another area where our research with rail and road users will be relevant. Our rail research¹⁶ continuously reinforces the need for accurate and timely information during service disruption. At such times passengers want information about how their trip will be affected. This includes the level of disruption and how that will impact their journey, alternative travel arrangements and timetables, and how to ask for appropriate assistance as passengers undertake a disrupted and potentially unfamiliar journey.

There are parallels here for air passengers – not just in terms of informing of delays to flights but also about disruption in getting to the airport. Again, we think a multi-modal joined up approach to managing disruption would benefit air passengers.

¹⁵ [Getting to and from the airport. Is coach an option?](#) Transport Focus. March 2019

¹⁶ [Rail passengers’ experiences and priorities during engineering works](#). Transport Focus. October 2017
[Planned rail engineering work – the passenger perspective](#). Transport Focus. December 2015
[Passenger information when trains are disrupted](#). Transport Focus. September 2014

9. Complaints and compensation

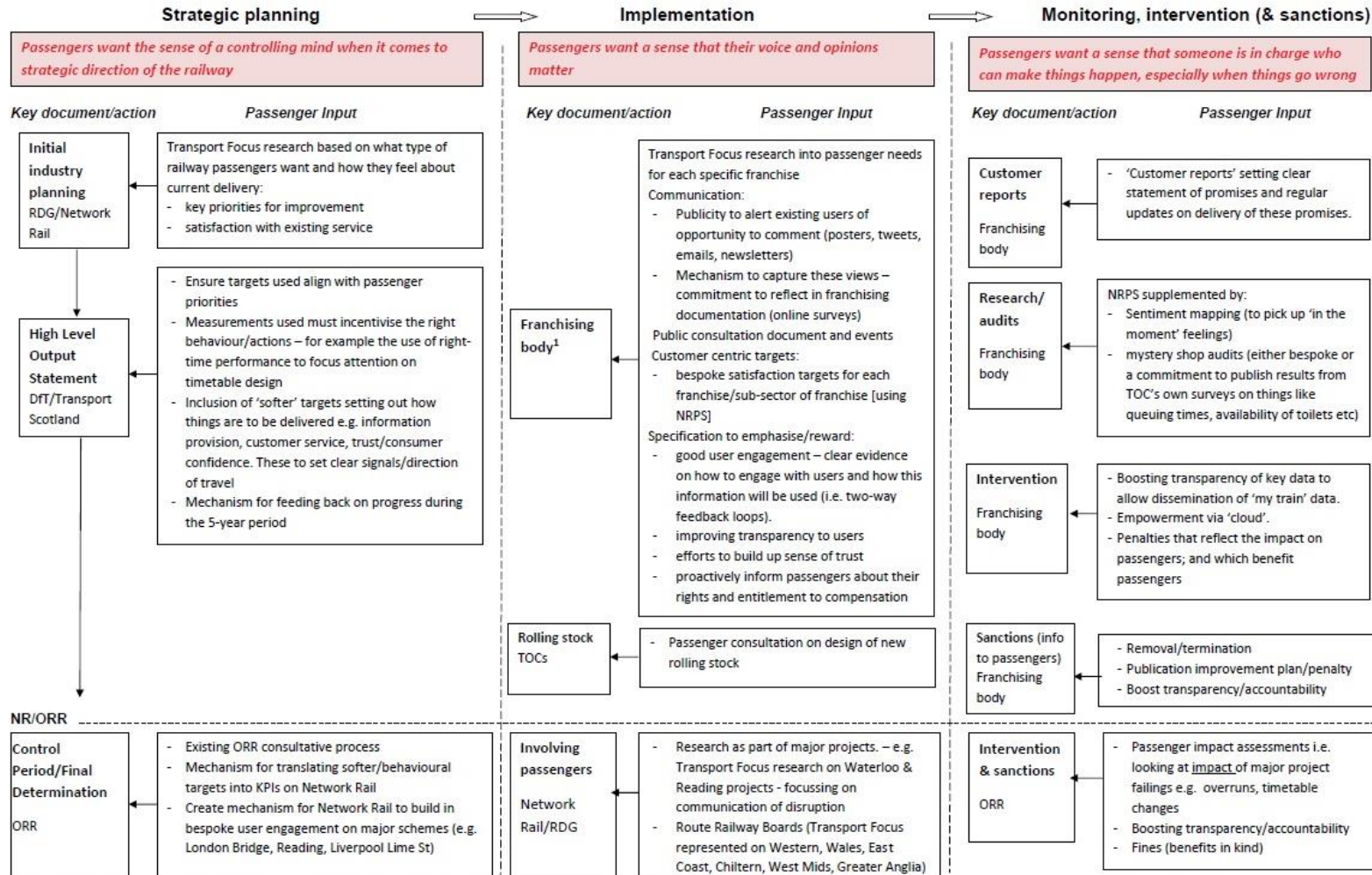
Section 5.54 from the consultation (page 127) refers to low levels of satisfaction among passengers and points to a lack of information on compensation, or delays in obtaining this as contributing factors.

This is another area where there may be some synergies with rail. The Department for Transport commissioned Transport Focus to carry out research to assess the propensity of passengers to claim compensation when they are delayed. In addition, the research explored: passengers' awareness of their eligibility to claim compensation; the experiences of rail passengers when claiming for compensation; and the reasons why passengers chose not to claim for compensation when delayed¹⁷. The key issues in the rail industry are a lack of awareness of passenger rights coupled with the complexity (both actual and perceived) of the process. This has plenty of parallels with air travel. Additionally, our research has showed that rail passengers would welcome automatic compensation, something which also is relevant to air travel.

We would be happy to outline our research in all these areas in more detail.

¹⁷ [Rail delays and compensation](#). Transport Focus. October 2018

Putting passengers at the heart of running the railway



1. Franchising body is the national or regional body (such as DfT, Transport Scotland or TfN) that specifies and monitors franchises

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