

VERITA

IMPROVEMENT THROUGH INVESTIGATION

Independent expert audit of ADR decision making for the Civil Aviation Authority

A report for
The Civil Aviation Authority

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Contents

Part A: Background and context	4
1. Introduction	4
2. Terms of reference	6
3. Executive summary	7
4. Approach	16
Part B: Available guidance - overview	19
5. Good practice in managing complaints - an overview	19
6. The ADR bodies' complaints processes and policies	20
Part C: Performance data analysis	25
7. Overall principles	25
8. General observations	28
9. Case management	31
10. Data management	38
11. Outcomes	47
12. Quality of responses	59
13. Interview feedback	74
Appendices	79
Appendix A. List of charts and data tables	79

Part A: Background and context

1. Introduction

1.1 The Civil Aviation Authority (CAA) is the UK's specialist aviation regulator. In 2015, as part of the implementation into UK law of a European Directive covering alternative dispute resolution (ADR), the CAA was given the role of Competent Authority for approving and overseeing bodies seeking to provide ADR services in the consumer aviation sector.

1.2 There are currently two CAA-approved ADR bodies operating in the sector - Aviation ADR (AADR) and The Centre for Effective Dispute Resolution (CEDR). Air passengers have had access to ADR for aviation since early 2016. Despite being voluntary, around 80% of those departing the UK by air are eligible to escalate a complaint to ADR for a binding decision as an alternative to taking court action. The CAA conducted a review of the first year of ADR, published in December 2017 and have now commissioned this independent audit of the two bodies for assurance as to the quality and consistency of decision making and to determine the extent to which these decisions are transparent.

1.3 A key feature of ADR in the aviation sector is the requirement, introduced by the CAA, that the decisions of the CAA approved ADR providers, once accepted by the consumer, are binding on the business.

1.4 Airline ADR schemes must handle the following types of complaints:

- Denied boarding, delay, or cancellation;
- Destruction, damage, loss, or delayed transportation of baggage;
- Destruction, damage, or loss of items worn or carried by the passenger;
- Problems faced by disabled passengers or passengers with reduced mobility when using air transport services (i.e. complaints about airlines arising under Regulation EC1107); and
- Any more general disputes arising where the consumer alleges that the business is not trading fairly. Here we are referring to situations where the consumer has been misled, for example into paying more for the flight or into buying something that they did not actually want, where the consumer has been harmed by the use by the business of an unfair contract term, or where the consumer has been

otherwise harmed by the breach by the business of general consumer protection law.

1.5 Airport ADR schemes handle complaints regarding:

- Problems faced by disabled passengers with reduced mobility when using air transport services

1.6 When considering quality, the CAA would like the audit to consider the process with specific reference, in order of priority, to:

1. Decision Making
2. Case Management
3. Transparency

1.7 The CAA have commissioned Verita, a specialist consultancy that conducts investigations and reviews, to carry out an independent audit of the two ADR bodies for assurance as to the quality and consistency of decision making and to determine the extent to which these decisions are transparent.

1.8 Verita is a consultancy specialising in the management and conduct of investigations, reviews and inquiries in public sector organisations. Verita has significant experience in managing complaints both at the 'front line' and as a supplier of an independent complaints review service.

2. Terms of reference

2.1 The CAA require an audit, based on a sample of cases, to assess the quality and consistency of decision making within and across the ADR bodies.

2.2 When considering quality, the CAA would like the audit to consider the process with specific reference to:

1. **Decision Making** - the accuracy, consistency and overall quality of decision making within and across the ADR bodies
2. **Case Management** - effectiveness, timeliness and quality assurance processes
3. **Transparency** - clarity about the process followed and demonstrating the evidence basis of decision-making

2.3 These areas will be assessed holistically, using a common methodology: reviewing sample cases, interviews with staff and analysis of documentary materials.

3. Executive summary

Introduction

3.1 The Civil Aviation Authority (CAA) is the UK's specialist aviation regulator. In 2015, as part of the implementation into UK law of a European Directive covering alternative dispute resolution (ADR), the CAA was given the role of Competent Authority for approving and overseeing bodies seeking to provide ADR services in the consumer aviation sector.

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3.6 The CAA have commissioned Verita, a specialist consultancy that conducts investigations and reviews, to carry out an independent audit of the two ADR bodies for assurance as to the quality and consistency of decision making and to determine the extent to which these decisions are transparent.

Audit approach

3.7 Our evaluation of the ADR bodies is designed to objectively assess the performance of the case handling function against both its internal policies and targets, and also against best practice we have observed across sectors and in individual organisations.

3.8 The review has involved audits of the ADR bodies' policies and procedures relating to complaints, including public facing information contained on the CAA, AADR and CEDR websites and in policy documents (what 'should' be done). This has then been compared with an audit of actual complaints handled by the ADR bodies, randomly selected from the complaints databases (what is done). These exercises were followed up by interviews with senior staff in the ADR bodies in order to test our understanding and to get an operational perspective on the service.

3.9 In relation to the audit of complaints, as our audit period we used all complaints received by both providers in 2019. Both ADR bodies provided a spreadsheet of their full data set in February 2020. Verita extracted a random sample of complaints across the audit period for both ADR bodies for detailed analysis. Between the two ADR bodies, a total of 39,554 complaints were logged - 28,562 to AADR and 10,992 to CEDR. We extracted a random sample (the audit sample) of 410 complaints across the period for detailed analysis - 242 from AADR and 168 from CEDR. This sample was weighted to be representative both between and within providers. This gives a confidence level of 95% (margin of error 5%) that the sample is representative of the whole data set. It is generally accepted that the 95%

confidence interval strikes the best balance between statistical rigour and maintaining a manageable sample size. In order to ensure that Verita use a properly randomised audit sample, Verita received the data from the ADR bodies in an unfiltered form, i.e. every record over the period.

Summary of key findings

3.10 While we make suggestions and recommendations for improvement in this report, these should be viewed through the lens of the overall strong performance by both ADR bodies. Our overall observation from the audit sample is that both ADR bodies provide an essentially good, fair and transparent service to complainants, with determinations that are evidence based and within guidance.

Decision making

Making evidence based, justifiable determinations

3.11 Our analysis of the audit sample cases shows that, in our view, the determinations made by both ADR bodies are generally good: i.e. in line with the scheme rules, internal policies and legislation, while accounting for the essential nature of the complaint. There was a question mark over the conclusions reached in only a small percentage of cases. In these cases, the complainant clearly has the ability to question the decision, and both bodies have mechanisms by which cases can be re-opened and the evidence re-examined, or, indeed, new evidence can be introduced. However, in our analysis of the sample, we found few cases in which complainants significantly challenged the adjudicators' decisions.

Understanding the complaint and addressing the concerns of the complainant

3.12 Based on the audit sample, both ADR bodies performed strongly in terms of understanding the issues underlying the complaint. Indeed, CEDR achieved a perfect score in this area, although it should be noted that the relatively prescribed scope of issues available for ADR means that it is not surprising to see such strong performance. Similarly, both ADR bodies performed well in addressing the specific concerns raised by complainants

at various stages of the process. That said, CEDR did score more highly than AADR in this respect and, in the latter's case, we found a small number of cases where we noted that AADR had not responded to all aspects of the complaint. This suggests that there is some room for improvement for AADR in this area.

Comparing outcomes

3.13 Our analysis of cases that are adjudicated by the ADR provider or settled by the operator indicates that a greater proportion of cases submitted to CEDR are either settled or progress to adjudication than for AADR. As explained later in this report, in part this is due to the figures for AADR being somewhat skewed by the overreporting of 'open' cases, and so the true numbers are likely to be similar - certainly within the natural variation we would expect between ADR bodies. For those cases that are adjudicated by the ADR bodies, our analysis suggests the complainants' success rate in obtaining compensation was only slightly greater for CEDR than AADR once discontinued and in progress cases are discounted. The difference may be due to the different approaches taken by the ADR bodies to making determinations in the face of missing or conflicting evidence.

Making consistent determinations

3.14 Within the audit period, two operators - referred to in this report as Airline A and Airline B - moved from CEDR to AADR as their ADR provider. Unfortunately, it is difficult to draw clear conclusions as AADR had only adjudicated an award of compensation payment to the complainant in a single case for one of the airlines, and many cases relating to both airlines were still in progress with AADR. We recommend that the CAA consider performing a stand-alone analysis on airline A in order to establish the side-by-side outcomes of the two ADR providers. This should be performed toward year-end when AADR's 'in-progress' cases will have been closed.

Case management

Handling and logging complaints

3.15 We found that, with one exception, all cases from the audit sample were correctly classified as in or out of scope for ADR. Every case that should have been considered had been, with a single case that was out of scope being included. Within the review of the audit sample, each complaint was given a score on a scale of one (poor) to five (excellent) for the handling and logging of the complaint. We rated the vast majority of cases for both ADR bodies as either excellent or very good, indicating we could not find any, or only very minor, faults with the handling of the complaint.

Timeliness

3.16 We interrogated the audit sample to assess performance against a number of metrics for timeliness, including the timeliness of the initial response, the time taken to assemble a complete case file, and the time taken to reach a decision from the completion of the case file. Our findings are as follows:

- Both ADR bodies performed well in providing an initial response to complainants within 15 days.
- In terms of the time taken to assemble a complete case file, operators for whom AADR provide the ADR service are on average considerably slower to respond with a case file than CEDR operators. Within these averages there is, unsurprisingly, considerable variation in the time taken for operators to produce a case file, although it is notable that the operators that receive higher volume complaints appear to be well practiced and efficient in this task.
- There is a degree of variation in the time taken by the two ADR bodies to reach their determination once in possession of the complete case file. Although both providers met the 90-day target in the vast majority of cases, the time taken to reach a determination was considerably shorter for CEDR than for AADR. It is notable that complaints concerning one operator in particular are significantly impacting on the performance of AADR in this area.

Data management

3.17 Both ADR bodies use a complaints portal to manage the ADR process, although both portals use different approach to manage the interaction between the airline, the ADR body and the passenger. In general, both approaches function well and deliver appropriate standardised interaction with complainants. In our analysis of the audit sample we saw few cases where passengers had complaints about using the portals.

3.18 Both ADR bodies performed well in relation to a number of data management metrics, including acknowledging new complaint cases, recording the current status of complaints, and in maintaining a full and accessible record of complaint activity.

3.19 In relation to the ADR body's initial review stage, we did notice a tendency that once CEDR cases had undergone an initial review, complainants were almost universally requested to submit further evidence to support the complaint. We found this amongst AADR cases too, but to a lesser extent. While it is good practice that such omissions are noticed at such an early stage in the process, we suggest it would be better if customers are prompted at the outset to upload evidence in a more structured way. We therefore recommend that both ADR bodies should consider if a more 'guided' method of initial evidence gathering could be developed in order to minimise the need for further evidence requests from customers.

3.20 In relation to recording the current status of complaints, we observed some data cleanliness issues in respect of a small number of cases for CEDR, but a more substantial issue with AADR. In AADR's case, many more cases in the full data set were reported as being open but, upon closer review, had in fact been resolved but had not been 'officially' closed. While this does not present an issue for the complainant or the operators interacting with the process, it does represent a data cleanliness issue and we would recommend that AADR endeavours to ensure that all cases, when completed, are recorded as such in the database, and that all relevant correspondence (including closing correspondence) is included. At the time of completing this report, we have been told by AADR that the issue has been recognised and rectified, though do not have the data to confirm this.

Data integrity

3.21 The complete databases for both ADR providers are good, with a high level of completion and few clear errors. As described in the previous paragraph we do observe that the maintenance of the AADR data could be improved, particularly in noting when cases are actually completed. We observe also that there are differences in nomenclature between the two providers, which is not surprising given that they are independent companies, but which can make comparability of the services time consuming in that the data has to be manipulated in order to derive comparisons. We would emphasise though that neither of these issues has a direct effect on complainants, rather it primarily affects the data reported to the CAA as overseer of the service. That said, for its analysis of provider performance, the CAA does not currently rely on any of the reported fields that we consider require attention. Notwithstanding this, the CAA should encourage the ADR bodies to align their nomenclature, in particular for discontinuation reasons, in order to better enable comparison of performance.

Transparency

Transparency of policies and procedures

3.22 In respect of the ADR bodies' policies and procedures relating to complaints, including public facing information contained on the AADR and CEDR websites and in policy documents (what 'should' be done), we found the CEDR website to be of very high quality. The site was easy to find by googling and is easy to navigate. The site is written in plain English. Where acronyms are used (e.g. 'ADR'), they are explained. The AADR website was more difficult to navigate, but this is recognised by the organisation and is under review.

Clarity about the process followed

3.23 In terms of keeping complainants informed about the process, our audit sample showed that both ADR bodies performed well in giving complainants a clear view of what to expect and by when, in particular in outlining timescales for action and next steps. Both ADR bodies also performed well in terms of setting out the approach taken to address the issue underlying the complaint. Based on the audit sample, adjudication reports invariably

set out the background of the complaint, the complainant's and operator's case, the legal basis for the complaint and crucially the approach that the adjudicator must take in making a determination.

3.24 In all but three cases in the audit sample we found that the appropriate legal basis for the determination was included and fully explained. In the complaints where this was not the case, this was largely due to conflict between the complainant's alleged reason for disruption and the evidence provided by the airline. We recommend that, in such cases, both benchmarks are set out and the different threshold requirements explained to the complainant to justify use of one benchmark over another.

Demonstrating the evidence basis of decision-making

3.25 Based on the audit sample, both ADR bodies consistently based their determinations on the evidence presented, and adjudicators routinely explained the evidence they had received in detail, demonstrating that each complaint had been handled and assessed on its merits. Further, both ADR bodies performed strongly in terms of their adjudicators drawing upon all the information available in coming to a determination - be that from complainant's or operator's evidence or from independent research. We found also that, where the airline had not already provided weather report data, adjudicators invariably researched this for themselves and included findings in the report. This is excellent, as it demonstrates that adjudicators are routinely making judgements based on the 'fullest picture' of the scenario.

3.26 Our review found that, in the face of missing or conflicting evidence, the ADR bodies took slightly different approaches in taking account of this in their determinations. Although it is not possible to say which of these approaches is correct, our view is that both ADR bodies could provide stronger guidance to complainants and operators as to the evidence required to make a determination.

Use of plain English

3.27 We found that, in the vast majority of cases audited, the language used throughout interactions with complainants was clear, with good spelling and grammar. In our view, the use of 'template' responses throughout the adjudication process has helped both bodies to

standardise this. Although we found that, in most cases, language and industry specific terms are used appropriately and explained with the audience in mind (i.e. the 'lay complainant'), we identified a small number of cases across the sample where there was an excessive use of jargon. We would advise that staff remain cautious in its use, to ensure that they are communicating in the clearest terms possible.

4. Approach

4.1 Our evaluation of the ADR bodies is designed to objectively assess the performance of the case handling function against both its internal policies and targets, and also against best practice we have observed across sectors and in individual organisations.

4.2 The review has involved audits of policies and procedures (what ‘should’ be done) against the answering of actual complaints randomly selected from the complaints databases (what is done). These exercises were followed up by interviews with senior staff in the ADR bodies in order to test our understanding and to get an operational perspective on the service.

4.3 The project was undertaken under difficult circumstances, as the COVID-19 lockdown was initiated at the start of our engagement with the ADR bodies. This introduced significant delays to the process as all parties became used to their new ways of working.

4.4 In our interviews with the ADR providers, we asked about how the current state of the airline industry was likely to impact their ability to continue to provide their services.

4.5 Rather than simply telling the organisation what it already knows by replicating core metrics, we have used a bespoke template to assess the strength of complaint responses against criteria that we know from experience to be important to complainants.

4.6 We have reviewed the ADR bodies’ policies and procedures relating to complaint management to assess their inherent strength, and to determine how well complaints are managed against these internal standards.

Desktop audit sample review

4.7 Verita requested policies and procedures from the CAA and ADR bodies in order to familiarise themselves with the benchmark standards which complaints will be assessed against. Through this process Verita assessed the consistency of policies across the ADR bodies’ internal policies.

4.8 As our audit period, we used all complaints received by both providers in 2019. Both ADR bodies provided a spreadsheet of their full data set in February 2020.

4.9 Verita extracted a random sample of complaints across the audit period for both ADR bodies for detailed analysis. Between the two ADR bodies, a total of 39,554 complaints were logged - 28,562 to AADR and 10,992 to CEDR. We extracted a random sample (the audit sample) of 410 complaints across the period for detailed analysis - 242 from AADR and 168 from CEDR. This sample was weighted to be representative both between and within providers. This gives a confidence level of 95% (margin of error 5%) that the sample is representative of the whole data set. It is generally accepted that the 95% confidence interval strikes the best balance between statistical rigour and maintaining a manageable sample size. In order to ensure that Verita use a properly randomised audit sample, Verita received the data from the ADR bodies in an unfiltered form, i.e. every record over the period.

4.10 Verita audited each complaint in the sample using the ADR bodies' handling processes and policies as the benchmark. We evaluated the ADR bodies' compliance to their internal complaint handling policy and recognised best practice. This report highlights whether the results and methods across the two bodies are largely consistent and identifies any area in which this is not the case.

4.11 In addition to these internal standards, we used Verita's own '*Principles of good complaint handling*' to design a bespoke template framework against which all complaints will be judged. We detail the questions used in the sample review in section 12 below.

4.12 The data set was fully anonymised in order to comply with GDPR requirements.

4.13 While much of our analysis was performed on the audit sample, in some instances we felt that there would be benefit in looking at the complete data set. In sections 8 to 12 below, we identify whether the analysis was on the audit sample or complete data set.

Structure of this report

4.14 This report is presented as three parts:

- Part A: Background and context - sections 1- 4
 - Introduction and background to this report including executive summary.
- Part B: Available guidance - overview - section 5 - 6
 - Good practice standards and ADR bodies' approach.
- Part C: Performance data analysis - sections 7 - 13
 - Thematic review of data analysis and interview feedback.

Part B: Available guidance - overview

5. Good practice in managing complaints - an overview

5.1 In evaluating performance in complaints management, it is important to consider the objectives of the work - why the complaints process is important to an organisation.

5.2 The Parliamentary and Health Service Ombudsman's 'Principles of good complaint handling' guidance emphasises the importance of having good procedures which, it says, *"can save ... time and money by preventing a complaint from escalating unnecessarily"*.

5.3 Key features of a good complaints system include:

- strong leadership from the top of the organisation;
- a focus on outcomes to be delivered both for the complainant and the organisation;
- fairness and proportionate responses;
- sensitivity to complainants needs;
- a clear and straightforward process, which is therefore accessible to users; and
- efficiency - with decisions taken quickly, things put right, and lessons learnt.

5.4 In the end, a good complaints process comes down to giving clear, balanced responses to the issues raised, while building a positive culture so that the organisation as a whole, and those responding to complaints, regard them as useful intelligence and a resource to aid learning and improvement. The role of the ADR body in this process is to help a business and their customer resolve a complaint. Whilst the principles cited above are aimed primarily at businesses, we believe that they should also be present in an effective ADR process

5.5 In the rest of this report, we assess the performance of the ADR bodies' complaints function against recognised best practice in complaint handling and build upon our observations from previous engagements of this nature.

6. The ADR bodies' complaints processes and policies

6.1 We reviewed the ADR bodies' policies relating to complaints, including public-facing information contained on the CAA, AADR and CEDR websites and in policy documents.

ADR websites

6.2 We assessed both the CEDR and AADR websites for how easy they are to use. We considered factors such as:

- Ease of finding the website (e.g. by googling)
- Ease of navigation around the site (including accessibility issues)
- Clarity of written information
- Ease of finding answers to questions
- Ease of getting in contact.

CEDR

6.3 We found the CEDR website to be of very high quality.

6.4 The site was easy to find by googling and is easy to navigate. It has information about accessibility issues and offers additional assistance if needed. The text is easy to read in a large size font and high contrast colours (blue or black on white). There is a clear link on the home page to 'BrowseAloud' text to speech technology.

6.5 The site is written in plain English. Where acronyms are used (e.g. 'ADR'), they are explained.

6.6 Some basic questions are answered on the home page and readers are referred to a separate FAQ section. The FAQ section is comprehensive and there is a clear link to it on the home page (although there is no link to the FAQs in the home page answer to the question "*I have other questions, what should I do*").

6.7 It is easy to find contact information, to see how to make a complaint and to see which organisations are covered by the scheme.

6.8 The home page includes a clear link to a privacy statement.

AADR

6.9 The AADR website was, in contrast, harder to use from the customer perspective as the useful features and functions referenced above were not evident and navigation around the site was less intuitive.

6.10 Googling terms such as “AADR airline resolution” lead to a website branded as ‘CDRL’. This is also the link supplied on the Civil Aviation Authority website, which describes the provider as “AviationADR (Consumer Dispute Resolution Limited)”. Navigating to the CDRL aviation page leads to <https://www.cdrl.org.uk/aviation-adr/>. These lead through to pages which are branded ‘Aviation ADR’. The branding of the CDRL and AviationADR sites is different and the relationship between them is unclear. For example, although the CDRL page has the title ‘AviationADR’ it does not include the Aviation ADR logo. Selecting ‘home’ on the Aviation ADR page takes the user to the (differently branded) CDRL page, without explanation. It should be noted, however, that complainants will be given a specific web-address by the airline in their deadlock letter, so have the ability to bypass the potentially confusing “Google route” if they choose to follow the link.

6.11 The AviationADR branded pages are confusing. The relationship between two landing pages is not explained:

- <https://www.aviationadr.org.uk/dashboard-access/>
- <https://www.aviationadr.org.uk/initial-complaints-check-page/>

6.12 The pages for submitting a complaint (<https://dashboard.aviationadr.eu/webform.php>) are branded differently again from either the CDRL or AviationADR pages. No navigation is provided to move from them back to the pages which include general information. The submission form is less user friendly than the CEDR equivalent.

6.13 The AADR website provides a less positive user experience than its CEDR equivalent. The site has more text and less space than the CEDR site and is, we believe, less well designed. The complaints portal has a strong grey background, reducing the contrast with the text. The only reference to accessibility issues is a link at the bottom of the AviationADR pages (it is only visible by scrolling down). There is no reference to accessibility issues on the complaint submission pages.

6.14 The text is generally written in plain English, although the term ‘ADR’ is used on the main CDRL page without explanation.

6.15 There are FAQs on both the initial CDRL and Aviation ADR pages, but they are not prominently linked to. There are no links to FAQs or other information from the pages used to submit complaints (in contrast this information is accessible from all the CEDR pages). The same applies to contact information - it is less prominent than on the CEDR pages and inaccessible from many pages. We saw no links to information about privacy/data protection.

Public-facing documents

6.16 We reviewed documentation provided by both CEDR and AADR which describe how the schemes operate. Clearly this information is supplementary to that on the website and in most cases, it will be easier for members of the public to refer directly to the websites. Nevertheless, there may be circumstances where downloading a document setting out how the scheme works is more convenient for users than the website.

6.17 Both organisations have formal ‘Scheme Rules’. These appear to be legally drafted and are reference documents. Although both are comprehensive and describe the scheme accurately, they are unlikely to be seen by members of the public as a convenient way of accessing information about the scheme.

6.18 Both scheme rules are consistent in terms of scope. We found one area where there may be some benefit in clarifying the wording of the scheme rules. Scheme rules for both ADR bodies state:

“The Scheme can be used to settle disputes between customers and subscribing companies stemming from aviation services contracts relating to a direct flight whose point of origin and/or final destination is in the United Kingdom, or aviation services contracts relating to a directly connecting flight where the point of origin, final destination or any point of connection takes place in the United Kingdom”

6.19 However, the EU regulation EC261/2004 setting out compensation due, upon which the ADR scheme is based distinguishes based on the origin or destination of the flight and where the flight operator is based. The regulation applies to all flights departing from the EU, regardless of the airline, but does not apply to flights arriving from outside the EU if the airline is not based in the EU.

6.20 This points to a difference between complaints being in scope for ADR bodies to handle and complaints being in scope for EC261 compensation to be paid. While we found that both ADR bodies consistently applied this rule correctly and acknowledge that the scheme rules are not primarily aimed at consumers, it could be a source of confusion for consumers in future. This regulation was applicable at the time of audit was completed - during the EU Exit Transition period. The application of the law has changed since Brexit.

Recommendation

R1 The CAA could review the wording of this area of the ADR scheme rules to avoid possible confusion to consumers and to ensure that scheme rules reflect any legal changes following the UK's exit from the European Union.

6.21 The overarching principle for both bodies is that they all have to be completed (from completion of the case file to the point of reaching a final adjudication) within 90-days.

6.22 The timescales for each intermediate stage are also given but do not always match up with each other and within different documents we have reviewed.

6.23 In terms of intermediate benchmarks, we have used the below standards in our analysis, but determined that the 90-day rule supersedes this:

- Acknowledgment within 2 days
- Initial assessment 15 days
- Airline response up to 28 days
- Complainant response 10 days (optional)
- Adjudication report within 15 days of the complete case file (based on ADR body internal timescales)

6.24 The complainant then gets up to 10 days to accept or reject the decision and the airline has 20 days to prove compliance.

6.25 The other documentation provided by each organisation is discussed below.

CEDR

6.26 CEDR have produced 'A Guide for Customers' (dated 2019) and a single page process flowchart. The guide for customers is, in fact, a set of frequently asked questions. These are helpful in providing insight into the process.

6.27 The Guide for Customers has been recently updated and is now good.

6.28 The flow-chart itself is a useful one-page summary of the process (although it does not mention timescales for the individual steps).

AADR

6.29 AADR's scheme rules are more accessible and better at explaining the process than those produced by CEDR but are nevertheless essentially a formal documentation of the rules rather than a guide.