



A submission from Inner West Council on the Aviation Green Paper – Towards 2050

Introduction

Airline travel in Australia is a necessity and essential service, given our vast continent. This is a result from the country's size and significant distances between major cities and towns, regional centres, and isolated communities.

Australia also has obligations as a signatory of the *UN Convention on the Rights of Persons with Disabilities 2008*. Rights driven equal access outcomes are required under the Convention and enshrined in Australian legislation that give domestic effect to these larger principles.

High quality customer experience for people with disability in planning and travelling by air is critical as poor customer service has a greater and more adverse impact on people with disability and has a flow on impact on other social and economic areas like health and wellbeing, tourism, and employment.

Concentrating on the rights of the customer as central to service improvement will lead to positive impacts across the industry. Innovation and technical advances are synonymous with air travel. Opportunities to improve access and inclusion outcomes are systemic in nature, and such changes benefit everyone, not just people with disability.

Green paper stakeholder questions

1. Improvements to accommodate unique requirements of air travel?

The whole of journey experience unique to air travel involves many stages and components. Barriers for people living with disability occur throughout the experience involving;

- trip planning and booking systems
- arrival and check in procedures
- boarding needs and options
- inflight service and facilities
- disembarkation, safety provisions and luggage/equipment collection
- concern over risk of damaged or lost equipment
- attitudes and practice that demeans the dignity of individuals as they travel.



For people with disability, situations are expected that compromise independence. However, improvements are necessary to minimise this. Areas to be considered include:

- recognition of assistive devices and their critical importance to travel, safety, and independence of people with disability
- policy to facilitate passengers unable to transfer to a regular aircraft seat to travel by air. Equitable provisions to accommodate the users of power wheelchairs is overdue
- create a triage system to identify and respond to common issues such as the difficulty people with intellectual or learning disability have accessing self-service kiosks to people with ambulant disability forced to stand in long queues for extended times
- removal of the maximum limit of two passengers with disability on a flight
- easier ticketing including online bookings without needing authorisation from carrier to accept the booking before purchase is finalised. This lack of market flexibility unduly reduces choice and ability to secure budget services and is a restriction of trade that affects people with disability unfairly.
- provision of ramped airbridges/portable ramp boarding (e.g., Hobart airport) which is safer and quicker for everyone as a standard feature
- increase the minimum number of lifts in terminals to ensure there is always a functional path of travel.

The highly regulated safety and security requirements have resulted in all people with disability being assessed similarly without the sophistication needed to address individual need. Too often this results in either a high level of assistance for a few people or none at all for the many.

The extent of assistance dependant on fitting an unrealistically narrow criteria that is unnecessarily framed in the deficient based medical model. Attention is needed to create policy, systems and procedure that reflect more accurately real user profiles that in turn strike a better balance between independence, imposed assistance or inadequate support and accommodations.

2. Improvements to aviation accessibility that are outside the scope of *Disability Standards for Accessible Public Transport*?

The Disability Standards for Accessible Public Transport 2002 and the *Disability Discrimination Act 1992* predate the Convention and require amendment to fully cover its articles and the scope of their application to standards. Work is needed



to develop policy guidelines that reflect the convention, including but not limited to:

- article 3 – general principles
- article 4 – general obligations
- article 19 – living independently and being included in the community
- article 20 – personal mobility
- article 21 – freedom of expression and opinion, and access to information
- article 22 – respect for privacy
- article 30 – participation in cultural life, recreation, leisure, and sport.

In addition to an effective policy framework, practical solutions to accommodate the diversity of abilities, and contemporary and emerging disability aids is required. With the right policy and practice settings established, the training and consistency of customer service, ground and in flight staff is urgent to maximise and support a quality and equitable experience.

3. Specific challenges faced by people with disability travelling by air in remote regional areas?

The primary challenge people with disability face travelling by air is cost and a lack of alternative providers. Rail is limited or no longer supported in many areas. Bus alternatives don't offer the same level of access as rail. The trip duration can itself be a barrier. These issues are not exclusive to remote regional areas although they are compounded by:

- size of aircraft and limited boarding infrastructure allowing people to physically get to and on the plane in smaller airports
- length of flight/seating in a regular seat or confined space
- Availability of an on-board toilet or the size of the toilet prevents access. In some instances, this can lead to air travel being unsafe and unviable for the person's health.

4. How can Disability Access Facilitation Plans by airlines and airports be improved?

A common experience that travellers with disability face is dealing with the impact of flight changes. These disrupt preparation for the flight and destination connections. Changes can't be avoided, however, change management and an awareness that full flexibility to change plans is not always viable for people with disability, particularly those who require assistance to travel (e.g. a support worker).



Other opportunity for improvements include:

- coordinating assistance effectively so as not to add to delays. Aisle chairs needed to transport passengers with a range of disability and/or health needs are in short supply as are trained staff to push them. This creates stress and delays for both staff and passengers that could be avoided by forward coordination of sufficient resources to meet documented and booked demand
 - Ensuring all inter site transport is accessible including shuttlebus services. Until airports have in place universally accessible systems to move people about in an efficient and timely manner they must create and maintain parallel alternatives those unable to freely use the primary options.
5. How should the Aviation Access Forum be restructured to be more effective and better able to drive and enforce change to address issues faced by travellers living with disability?
- It is suggested the Aviation Access Forum be given the remit to help develop the policy guidelines that reflect the Convention articles and in partnership with other industry, regulatory stakeholders deliver them in practice.
 - The Forum should include representation from people with lived experience of disability to assist in developing practical solutions and identifying opportunities for change.