



By your side

Friday, 28 February 2025

Aviation Industry Ombuds Scheme (AIOS)  
Department of Infrastructure, Transport, Regional Development,  
Communications and the Arts  
GPO Box 594  
Canberra ACT 2601

**Re: Aviation Customer Rights Charter**

The Australian Services Union (ASU) is one of the largest trade unions representing workers in the aviation industry, including customer service agents, contact centre agents and ground operations staff at airports nationwide. ASU members are at the forefront of aviation customer service, playing a vital role in ensuring safe, accessible, and dignified travel experiences for passengers.

The proposed Aviation Customer Rights Charter is necessary to ensure fair treatment for passengers. However, it is equally essential to recognise that robust customer rights do not just benefit passengers—they are critical to the safety and well-being of aviation workers. Frontline airline and airport workers, including ground staff and customer service employees, are bearing the brunt of inadequate service models that prioritise cost-cutting over people.

Airlines are shifting to online and app-based resolutions, reducing in-person support and increasing the pressure on already overworked staff. This results in heightened passenger frustration and contributes to a toxic environment where abuse and aggression against workers are common. The statistics paint a dire picture in our industry survey:

- 37.88% experience abuse or aggression from customers daily, with an additional 25.88% facing aggression several times a week.
- 79.55% of aviation workers have been yelled at by customers.
- 72.35% have been belittled or sworn at.

Workers are vulnerable, and customers are left without adequate service without proper in-person support structures. The ASU calls for **mandated on-site support** to shift away from the airline industry's growing reliance on digital-only solutions. Airlines and airports must be held accountable for providing safe working conditions and effective service solutions.

**SUMMARY OF RECOMMENDED IMPROVEMENTS:**

1. **Mandate a Clear Positive Duty** – Strengthen protections by requiring airlines and airports to actively eliminate discrimination actively, ensuring respect for personal identity, cultural dress, religious practices, and full accessibility for persons with disabilities.

2. **Require On-Site, In-House Essential Services** – Essential customer support, particularly for passengers with disabilities, must be provided by in-house staff rather than remote phone assistance. Increased staffing is necessary to improve accessibility and service quality.
3. **Clarify Responsibility Between Airports and Airlines** – Establish a clear framework defining responsibilities to prevent disputes over passenger assistance and ensure seamless and consistent service.
4. **Mandate In-Person Support for Cancellations and Disruptions** – Airlines and airports must provide on-site assistance for delays, cancellations, and disruptions rather than relying on apps or call centres. Properly staffed support desks should handle rebooking, compensation, and passenger needs.
5. **Ensure Accountability Through Public Reporting** – Implement standardised reporting on service performance, including call centre wait times, complaint resolution timelines, and publicly available customer feedback statistics.

## SUBMISSION

### **Proposed Right 1: The Right to be Treated with Dignity and Respect in an Accessible and Inclusive Environment**

The right to be treated with dignity and respect in an accessible and inclusive environment is fundamental to ensuring all passengers can travel easily and confidently, regardless of their circumstances. This right not only promotes non-discriminatory practices but also strengthens accessibility measures and guarantees respectful communication throughout the travel experience. Enhancing these protections is essential for ensuring compliance with legal standards while improving airport infrastructure and support services for passengers with additional needs.

Disability advocates highlight that staffing shortages often result in passengers not receiving the assistance they need to transfer from their customised wheelchair to an airline chair. When assistance is unavailable, passengers may be denied boarding altogether.<sup>1</sup> Even when support is provided, inconsistent or unsafe transfer methods can lead to discomfort or personal injury. These gaps in service demonstrate an urgent need for properly trained staff and standardised procedures to ensure the safety and dignity of all passengers requiring assistance. ASU members have raised concerns about inadequate training, unclear procedures, and poor resourcing for wheelchair assistance at airports. One ASU member noted, *“The mixed messaging of correct procedure when dealing with people who need to use an aisle wheelchair,”* highlighting the inconsistency in training and protocols that compromises passenger dignity and safety. Another added, *“I dislike the expectation to push wheelchair passengers in unsuitable equipment,”* which illustrates the lack of investment in safe resources. Wheelchair services are often treated as unskilled work, and the workers engaged are among the lowest paid at the airport. Strengthening protections through a positive duty will ensure clear guidelines, proper training, and better equipment, which is essential to ensuring a safer and more inclusive travel experience.

#### **ASU Recommended Improvements:**

1. **Mandate a clear positive duty:** The current wording allows for broad interpretation and minimal enforcement. A shift in policy is needed—from merely *preventing* discrimination to

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<sup>1</sup> Public Interest Advocacy Centre, Submission to the Aviation Green Paper (Submission, 20 November 2023), pg. 5.

*actively taking reasonable and proportionate measures to eliminate issues such as sex discrimination.* This positive duty should be explicitly applied to the following areas:

- Respect for personal identity, cultural dress, and religious practices: Ensure that personal identity, cultural attire, and religious practices (including clothing) are respected throughout the travel experience.
- Persons with disabilities: Guarantee the rights and dignity of persons with disabilities, ensuring full access and accommodation.

### **Proposed Right 2: The Right to Accurate, Timely, and Accessible Information and Customer Service**

The right to accurate, timely, and accessible information is crucial for transparency in travel. It ensures passengers are fully informed about ticketing, disruptions, and entitlements. Clear and prompt communication helps minimise confusion, reduce frustration, and allow passengers to make informed decisions. Strengthening this right ensures service expectations are met and passengers can access in-person assistance when needed.

#### **ASU Recommended Improvements:**

1. **Mandate essential services are provided on-site by in-house employees** – this will reduce reliance on remote phone assistance except when absolutely necessary. Disability advocates emphasise the need for greater on-site support<sup>2</sup>, and simply lifting restrictions on wheelchair users is insufficient without a corresponding increase in staffing.
2. **Clear responsibility for assistance at airports and airlines**—establish a clear delineation of responsibility between Airport Authorities and Airlines. Frequent disputes and confusion arise over who is accountable for various aspects of infrastructure, particularly in shared spaces or within airline terminals. A well-defined framework outlining the responsibilities of both parties will ensure that passengers receive consistent and efficient support, preventing gaps in service and improving overall operational clarity.

### **Proposed Right 3: The Right to Prompt and Fair Remedies for Cancellations, Delays, and Disruptions**

The right to prompt and fair remedies for cancellations, delays, and disruptions is essential to ensuring that passengers are not stranded or unsupported during unexpected travel interruptions. Timely updates, compensation, and access to essential services are vital for minimising inconvenience and preventing unnecessary hardship. Strengthening these rights holds airlines accountable for service failures, ensuring they take responsibility for disruptions rather than burdening passengers.

Airlines have systematically reduced higher-paying, skilled roles once dedicated to resolving customer issues, replacing them with an overreliance on contact centres and self-service apps. ASU members have witnessed the negative impact of these cuts, with one member stating, *“the under-staffing we are seeing on the floor means more workload.”* This shift has led to a reduction in on-the-ground support for passengers. These experiences identify the urgent need for stronger protections that guarantee passengers receive real-time, in-person assistance when disruptions occur.

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<sup>2</sup> People with Disability Australia, *Submission on the Draft Aviation Customer Rights Charter* (Submission, 20 January 2025)

By reinforcing these protections, we can ensure that passengers are not left to navigate disruptions on their own. Providing immediate, in-person support when issues arise is critical to maintaining trust in the aviation industry and ensuring a fair, accessible, and dignified travel experience.

#### **ASU Recommended Improvements:**

1. **Mandate in-person support**—Airlines and airports must be equipped to resolve issues related to cancellations, delays, and disruptions directly on-site, ensuring that passengers receive immediate, in-person support. Passengers should not be referred to apps or contact centres as primary means of resolution. On-the-ground staff, properly trained and sufficiently staffed, should be available to provide timely updates, compensation, and access to essential services, minimising inconvenience and preventing unnecessary hardship. This direct support is crucial to maintaining service standards and ensuring that airlines take responsibility for disruptions rather than shifting the burden onto passengers.

#### **Proposed Right 4: The Right to Safe and Timely Baggage Handling and Fair Remedies for Damage and Delays**

The right to safe and timely baggage handling and fair remedies for damage and delays is fundamental to maintaining trust in airline services. Passengers expect their luggage to arrive intact and on time, and clear and efficient compensation processes are essential when issues arise. Strengthening this right ensures greater accountability in baggage services, reducing delays and preventing unnecessary stress for passengers.

However, chronic understaffing and inadequate resources are undermining baggage handling standards. As one ASU member explained, *“We are operating in our area of Baggage Services with 60% of staffing levels to what we were pre-COVID, and we have more flights out of our terminal now than before.”* Another worker shared, *“We constantly go without proper breaks because we are so busy and do not have the coverage or the tools to do our job properly.”* These firsthand accounts highlight the urgent need for stronger protections, proper resourcing, and a commitment to direct employment in baggage services to ensure efficiency and fairness for workers and passengers.

The ASU does not have specific recommendations at this time. However, direct and additional employment is crucial in enhancing the overall passenger experience.

#### **Proposed Right 5: The Right to the Protection of Personal Information**

The right to protect personal information ensures that passengers' data is handled securely and in compliance with privacy laws. Transparency in data collection, retention, and third-party access is necessary to prevent misuse and breaches. Strengthening this right reinforces trust in the aviation industry and ensures stricter oversight of personal information management.

ASU has no recommendations to make.

#### **Proposed Right 6: The Right to Provide Feedback**

The right to provide feedback is essential for maintaining service quality and ensuring passengers can voice concerns without fear of retaliation. A clear and structured complaint resolution process holds airlines accountable and helps improve service standards. Strengthening this right ensures transparency, timely responses, and access to independent advocacy when needed.

#### **ASU Recommended Improvements:**

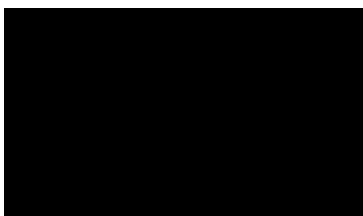
1. **Accountability through public reporting by implementing standardised reporting data,** including:
  - Call centre to wait times and resolution timelines.
  - Average time to resolve customer complaints.
  - Publicly available statistics on customer feedback trends.

## **Conclusion**

This Aviation Customer Rights Charter cannot succeed without a fundamental shift toward direct employment, on-site support, and stronger protections for aviation workers. When customer service is outsourced or moved online, passengers and workers suffer. The current airline model places workers in unsafe conditions where over 79% have been yelled at by customers, and over 72% have faced verbal abuse.

Passengers' rights and worker safety are intertwined. Without a well-supported workforce, service quality will continue to decline, and passengers will suffer. The government must ensure that airlines and airports prioritise people over cost-cutting measures and create a fair and safe aviation industry for workers and passengers.

Yours faithfully



National Secretary