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AVIATION CUSTOMER RIGHTS CHARTER: CONSULTATION PAPER

Submission to the Department of Infrastructure, Transport,
Regional Development, Communications and the Arts



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INTRODUCTION

Canberra Airport welcomes the opportunity to provide feedback on the Interim Aviation Industry Ombuds Scheme's (AIOS) draft Aviation Customer Rights Charter. The aviation industry is a key cornerstone of the Australian economy, keeping the country connected by providing passenger, freight, medical and support flights to major cities and regional communities. Customers benefit from a strong, transparent and consumer-orientated aviation sector.

Since the COVID-19 pandemic, customers have increasingly raised concerns about the level of service delivered by airlines. From rising flight delays and cancellations, lost baggage and not receiving remedies when services are not delivered, customers have overwhelmingly called for improved accountability from airlines. The establishment of the AIOS and the drafting of the Charter have provided a foundation for the Commonwealth Government, industry and customers to work collaboratively to ensure the right balance between improved customer service and operational practicality is achieved. Despite this, there are refinements that must be made to the Charter, because in its current iteration, it will impose additional regulatory and financial burden on airports.

Canberra Airport believes airports should be excluded from the Charter, given that the significant majority of complaints and concerns raised about the conduct of aviation industry participants relates to airlines. This is because airlines engage directly with customers in the provision of ticketing, scheduling, customer service and baggage handling, which are the most common services that aviation customers complain about. As infrastructure providers supporting the operations of airlines, airports have little direct engagement with customers. Car parking is generally the only significant service delivered to customers by airport operators.

In the 12 months to November 2024, Canberra Airport welcomed 2,797,167 passengers and many more guests through its terminal and facilities. In that same period, 93 items of feedback, including complaints, compliments and general enquiries, were received from these customers. This equates to just 0.003 per cent of customers providing any form of feedback. The most commonly raised issue was property damage through security screening which is provided by a third-party screening authority that follows protocols mandated by the Department of Home Affairs. The airport only provides the physical infrastructure for this service to be delivered, and complaints regarding staffing or procedures are referred to the relevant body for further investigation. This demonstrates the extremely small number of complaints received relating to services directly provided by the airport.

If the AIOS determines that airports should be included in the Charter, Canberra Airport is confident that its existing measures will meet each of the proposed recommendations that relates to airports. Canberra Airport has reviewed the draft Charter and identified refinements that should be considered by the AIOS. It is accepted the proposed rights provide a foundation for aviation industry participants to deliver enhanced customer service and effectively respond to feedback from customers. Although the intent of the Charter is supported, Canberra Airport believes there needs to be greater consideration by the AIOS on refinements which will deliver improved customer protections without adversely shifting additional regulatory and administrative burden to aviation industry participants.

PROPOSED RIGHT 1

Aviation industry customers have the right to be treated with dignity and respect, in an accessible and inclusive environment

Canberra Airport is committed to the delivery of an accessible and inclusive environment for all customers. The development of a wide range of initiatives for customers who require specific attention or assistance to take advantage of the terminal services and facilities has been a guiding principle of the airport for more than two decades. This has been implemented through leading design principles which meet and exceed the requirements of the Public Transport Disability Standards. Equally important has been ensuring the information required to meet special needs is publicly available to further assist customers with disabilities to seamlessly plan their journey through the airport.

A detailed *Disability Access Facilitation Plan* has been developed by Canberra Airport to ensure customers and guests who require attention or assistance are aware of the measures the airport will take to ensure access to the terminal and facilities is as seamless as possible. The plan also provides steps on how customers can assist the airport to best deliver an appropriate service. The support currently provided at Canberra Airport includes:

- Kerbside arrangements for customers who require special assistance
- Provision of accessible car parking
- Special screening methods for customers who require specific attention or assistance
- Lifts for mobility impaired customers
- Audio-frequency induction loop systems
- Bathroom facilities for customers with mobility and vision impairments
- Tactile ground surface indicators
- Numerous flight information displays and public address announcements
- Televisions with text captioning
- Wheelchair facilities, including those for wide-body and narrow-body aircraft
- Wayfinding directory boards
- Public telephones that can be accessed by those using wheelchairs
- Prayer room
- Accessible passenger boarding bridges

These measures demonstrate that providing customers with easy navigation while accessing the terminal and facilities has been a constant focus at Canberra Airport. The terminal was thoughtfully designed to minimise signage while enhancing navigation at crucial decision-making points. Understanding that travel can be stressful, the architects crafted an intuitive space using multiple design elements, guiding colours, directional floor tiles and lighting to assist customers find their way naturally.

Canberra Airport also maintains a strategic wayfinding footprint throughout the terminal, ensuring the clarity at key decision-making points along the customer journey. To better serve international customers, Mandarin has been added to critical signage locations. The Visitor Centre in the arrivals terminal also supports international customers with helpful information and guidance.

Canberra Airport has continually worked towards the delivery of an accessible and inclusive terminal where all customers are treated with respect. The measures and initiatives that have been adopted over more than 25 years have been designed to deliver customers a seamless journey through the terminal and airport facilities. Consequently, Canberra Airport meets many of the requirements set out by Proposed Right 1. However, the AIOS is urged to consider the following refinements that would strengthen the overall effectiveness of the right.

The AIOS should consider amending the right to “Aviation industry customers have the right to be treated with respect, in an accessible and inclusive environment”. The rationale for excluding the phrase “dignity” is due to the subjective nature of the word. Perceptions of dignity can vary depending on context and an individual’s understanding of how a person can be treated with dignity. Whereas “respect” is a universally defined and understood phrase that aviation industry participants and customers understand. This amendment would remove any confusion and reinforce the notion that all aviation industry customers must be treated with respect throughout their travel journey.

The requirement that signage be provided in multiple languages and formats to assist wayfinding is a reasonable proposal, particularly to cater for increased international visitation and to support those who require specific assistance. Yet, further clarification must be provided by the AIOS on how this proposal will be implemented. Each airport welcomes inbound visitors from different parts of the globe. For instance, by the end of 2025, Canberra Airport will have international services to Fiji and Qatar. Adopting language requirements mandated by the AIOS may not be suitable for inbound passengers from these markets. Canberra Airport recommends that airports be provided the autonomy to select the languages to publish on wayfinding material to ensure it reflects the language requirements of inbound passengers.

Canberra Airport agrees that the requirement for airlines and airports to have a customer service charter or statement to outline how professional, reliable and consistent customer service is delivered will assist customers through their travel journey. However, the references to a charter or statement in the *Consultation Paper* are relatively broad and ambiguous and do not provide sufficient detail on how the AIOS will implement this requirement. There needs to be greater consultation with aviation industry participants on the format which the charter or statement will need to be presented, if there will be any mandated inclusions or language that will need to be adhered to or if it will need to be submitted to the AIOS for approval prior to its publication. Canberra Airport would encourage the AIOS to provide more detail on how a proposed charter or statement would be adopted by airlines and airports. It is crucial that a refined set of industry-accepted standards and commitments are developed through consultation to ensure that customers are treated in a respectful manner.

As has been detailed, Canberra Airport has implemented a variety of measures in the terminal and airport facilities to deliver an inclusive and accessible environment for all customers. By working with the AIOS, it is hoped that refinements to Proposed Right 1 can be achieved that strengthen Canberra Airport’s ability to deliver a seamless travel journey for those who require specific attention or assistance.

PROPOSED RIGHT 2

Aviation industry customers have the right to accurate, timely and accessible information and customer service

Travelling can be an overwhelming experience, particularly at airports where customers have to check-in, navigate the security screening process and locate their allocated gate, all within a specific period. Over the past 25 years, Canberra Airport has worked to limit any inconvenience for customers while they journey through the airport. In addition to easy-to-navigate design principles adopted in the terminal, excellent and prompt customer service to those transiting through the terminal and making use of airport facilities is central to the overall mission of Canberra Airport.

To support this objective, a customer service office is located adjacent to the arrivals terminal which is staffed by highly experienced customer service officers (CSOs) from 5:00am until after the last flight arrives each day who provide essential assistance to customers. The CSOs are complemented by Airport Duty Managers (ADMs) who move throughout the terminal providing essential support to customers at each point of their journey. Both CSOs and ADMs undertake extensive training to ensure they possess the requisite knowledge and skills to positively engage with customers from diverse backgrounds, cultures and nationalities.

As the first point of contact, the CSOs and ADMs are committed to assisting customers safely move through the airport facilities, locate their gates and resolve any issues that may arise during their time at the airport. By having CSOs and ADMs accessible to all customers, Canberra Airport has ensured that information and support is continually available to assist the customer during their journey through the airport. Canberra Airport is confident that the role already undertaken by CSOs and ADMs to support customers is how the AIOS proposes other aviation industry participants will deliver customer service.

Canberra Airport's commitment to customer service is not restricted to face-to-face interactions. Customer engagement through the Canberra Airport website and social media channels continues to grow and airport representatives are available during business hours to provide timely assistance and support. The website has been designed in a manner that is easy to navigate and allows aviation industry participants and customers to access simple and transparent terms and conditions. This is particularly relevant for those who are directly making use of Canberra Airport services, such as general aviation pilots and customers using the airport's car parks.

Despite the best intentions of Canberra Airport representatives to keep customers informed of issues that arise during their journey through the terminal, sometimes it is not always possible due to a lack of communication from other parties. It is noted that customers are often frustrated with the lack of communication from airlines about flight delays, cancellations or disruptions. With some airlines not employing frontline customer service staff at Canberra Airport, it is difficult for ADMs to obtain information about the reasons why a flight is delayed or how long customers will be required to wait.

As an infrastructure provider, Canberra Airport does not have access to the internal communications of airlines and is reliant on the information about delays and cancellations being conveyed from airline

representatives so that customers inside the terminal can remain informed. When this does not occur, the ADMs are unable to keep customers updated. This causes tension among customers who become frustrated about the lack of information available.

In addition to the flight boards inside the terminal, the Canberra Airport website contains real-time updates about scheduled departure and arrival times which are easily accessible through any digital device. When airlines do provide information to the airport about flight delays, cancellations and disruptions, it is immediately updated on the website to ensure that airline customers are provided with the most accurate information about their flight. The onus should not be placed on airports to fulfil an airlines core responsibility of keeping their customers informed. There needs to be increased commitment by all airlines to having a customer service presence in regional airports to ensure they are available to provide timely and accurate information regarding the services they deliver to customers.

Canberra Airport continually strives to deliver an excellent customer service experience for those using the terminal or airport facilities. Through the highly skilled CSOs and ADMs, the airport has been able to provide customers with timely and accurate information that supports their journey through Canberra Airport. Greater engagement by some airlines with their customers would likely improve the overall travelling experience and reduce frustrations that emerge due to a lack of communication. Canberra Airport supports the objectives which Proposed Right 2 will likely achieve.

PROPOSED RIGHT 3

Aviation industry customers have the right to prompt and fair remedies and support during and after cancellations, delays and disruptions

Airline customers have expressed growing concerns about flight delays and cancellations in the years since the COVID-19 pandemic. Canberra Airport has seen firsthand the consequences of repeated delays and cancellations by airlines. Passengers have been left stranded in the terminal and forced to find alternate modes of travel or accommodation due to a lack of support from the airline that had cancelled their flight. To support these customers, Canberra Airport has repeatedly called on the airlines, Commonwealth Government and the Australian Competition & Consumer Commission (ACCC) to address the high cancellation rates out of the airport.

Proposed Right 3 complements these calls by enshrining a widely accepted belief that customers should receive the service they paid for and, if not, they will be entitled to a refund. The requirement to provide the necessary support in the event of a delay is also a welcomed initiative as it will ensure customer service will return to being a key focus of all airlines.

Canberra Airport supports this proposal as it places customers at the forefront of decision-making by airlines and will hopefully reduce the number of unnecessary delays and cancellations that have plagued the domestic aviation network over the last five years.

PROPOSED RIGHT 4

Aviation industry customers have the right to safe and timely baggage handling and fair remedies for damage and delays

Another impediment to a seamless travel experience for airline customers, other than a delay or cancellation of their flight, is the mishandling or damage of baggage. Canberra Airport appreciates the frustration experienced by many customers when their baggage fails to appear at the end of their journey, or if it does, having suffered damage. Despite relatively low rates of mishandled and damaged baggage across the domestic aviation network, it is important for customers to be able to seek remedies in the event their personal items are delayed or damaged.

As expressed in the *Consultation Paper*, it is the airlines and their contracted ground handling agencies who are responsible for the significant majority of delayed or damaged baggage. It is important that customers are able to obtain improved assistance and remedies from airlines if an issue arises with their personal items. Canberra Airport works closely with all airlines and their contracted baggage handlers to guarantee that minimal disruption is experienced by customers using the airport. Despite this, there are times where factors out of the control of Canberra Airport causes baggage to be delayed or damaged.

Airlines using Canberra Airport contract out the management of delayed or damaged baggage to ground handling agencies who are, in most cases, the entity responsible for investigating and responding to feedback from customers about baggage handling. In few instances, Canberra Airport infrastructure can cause minor damage to some items of baggage while being processed through mandated security screening. With regular maintenance from technical staff, Canberra Airport has been able to minimise the likelihood of damage occurring to less than one item of baggage per year. In the unlikely situation that Canberra Airport is liable for any damage to a customer's personal items, procedures currently exist for the airport to provide affected customers with appropriate remedies.

Canberra Airport remains committed to providing exceptional customer service and support to those who encounter delays or damage to their baggage while using the airport's facilities.

PROPOSED RIGHT 5

Aviation industry customers have the right to the protection of their personal information

It is acknowledged that there may be occasions where the personal information of customers is mishandled by organisations, including those in the transport sector. The overall intent of Proposed Right 5 to support customers is recognised, however, it may be unnecessary given the Office of the Australian Information Commissioner (OAIC) is well-established in receiving feedback and conducting investigations into allegations of breaches of privacy by an organisation.

The support provided by the OAIC is widely known, with 3,215 privacy complaints received in 2023-24. It is apparent that customers are aware it is the appropriate body to lodge feedback regarding the mishandling of personal information. Given this, Canberra Airport suggests Proposed Right 5 would be a duplication of existing processes. This is particularly the case at Canberra Airport, where the objectives of Proposed Right 5 are already followed by the airport in compliance with its legislative obligations.

Protecting the personal information of each customer who interacts with airport representatives or makes use of airport facilities has been a key focus of Canberra Airport for more than 25 years. The airport's privacy policy is managed by a specialist Privacy Officer who is responsible for ensuring it is updated in line with relevant legislation. The policy, which is published on Canberra Airport's website, details the measures the airport has taken to protect personal information in accordance with the Australian Privacy Principles (APPs).

The policy is easily accessible from the home page of the website. Customers can simply navigate to the bottom of the page, where the complete policy and the contact details for the Privacy Officer can be read, downloaded and printed.

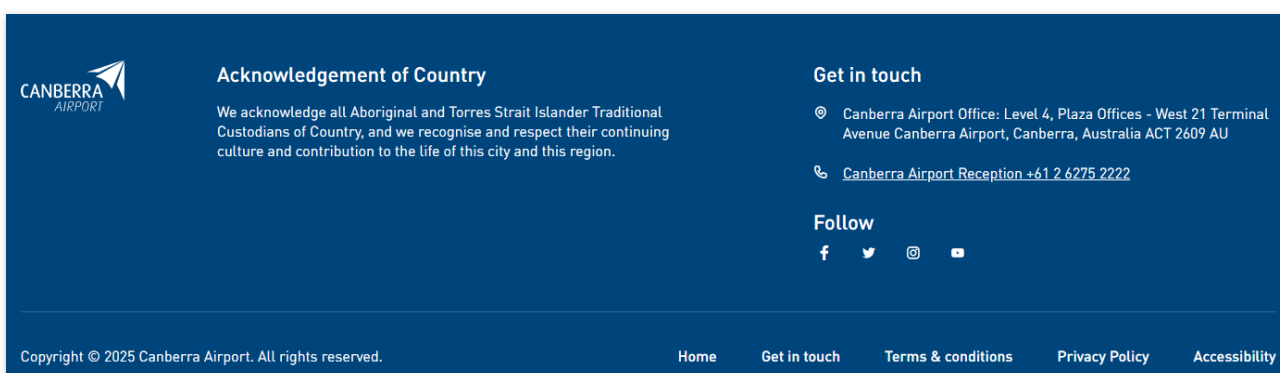


Image 1: The 'Privacy Policy' is easily accessible from the bottom of the Canberra Airport website home page.

The policy directly outlines how Canberra Airport collects, handles and stores the personal information of customers. Information is only collected when it has been directly provided by the customer through a letter or email, via the website or through direct face-to-face contact. Canberra Airport clearly communicates to its customers that there is no requirement for personal information to be provided in

their dealings with the airport, but by choosing not to, it may limit the ability of Canberra Airport to effectively respond to their feedback.

Personal information is only supplied to third parties in compliance with the *Privacy Act 1988*. In most cases, information is shared with other aviation industry participants to improve a customer's overall journey through the airport. Sharing particular details about a customer's accessibility or health requirements with an airline supports Canberra Airport's goal of delivering a seamless customer experience. Except for certain obligations under relevant legislation, such as assisting law enforcement agencies, Canberra Airport is committed to not disclosing personal information to third parties without the consent of the customer.

Canberra Airport has engaged considerably with its IT contractors to guarantee that there is no unauthorised disclosure of personal information. The details provided by customers is securely stored in databases, which can only be accessed by authorised Canberra Airport employees using a password. If hard copies of records containing personal information exists, these records are only held in locked storage cabinets which can only be accessed by authorised employees using a key. These measures ensures the airport is compliant with its obligations under the *Security of Critical Infrastructure Act 2018* for information security management.

If a customer is concerned their personal information has been unlawfully disclosed to a third party, clear steps are provided on the website detailing how to lodge a complaint to Canberra Airport's Privacy Officer. In the event the customer is not satisfied with the investigation and response provided by the Privacy Officer, the contact details for the OAIC are provided to allow the complaint to be escalated to the external agency for further investigation and resolution.

The introduction of Proposed Right 5 would only duplicate the processes Canberra Airport has followed for more than two decades to lawfully handle and store the personal information of customers. Complying with its obligations under the *Privacy Act 1988* has been characteristic of Canberra Airport's handling of personal information. By making the privacy policy readily accessible to the public, the airport has endeavoured to support the rights of customers by directly informing them of how Canberra Airport collects, handles and stores their personal information, without disclosing it to third parties. By providing the details on how customers can lodge a complaint to the airport's Privacy Officer or the OAIC demonstrates the transparent approach the airport has taken over several decades to protect the personal information of customers. The AIOS is urged to consider the need for Proposed Right 5 to be introduced.

PROPOSED RIGHT 6

Aviation industry customers have the right to provide feedback, make complaints and exercise their rights without retribution

For more than 25 years, Canberra Airport has been committed to delivering outstanding service to those using the airport's facilities. As the gateway to the ACT and southern NSW, the terminal is one of the most visited buildings in the national capital region. With more than 3 million people using the terminal facilities each year, the airport takes its responsibility to provide a welcoming and inclusive environment very seriously. It is acknowledged that for a variety of reasons, some customers may have an unsatisfactory experience while at the airport.

To address and resolve any concerns identified by customers, Canberra Airport has enacted a user-friendly process for feedback to be provided online, in person or over the phone. By adopting inclusive design principles, the Canberra Airport website has been developed to promote the sharing of feedback from customers. Prominently displayed on the home page is a prompt for visitors to contact airport representatives to share any feedback relating to their use of airport facilities. By navigating to the 'Contact' page, customers can access the appropriate phone numbers to speak with an airport representative or the option to submit feedback that is forwarded to specialist staff for investigation and response. As illustrated below, the 'Contact' page where customers can obtain information on how to lodge feedback is displayed prominently in the top right corner.

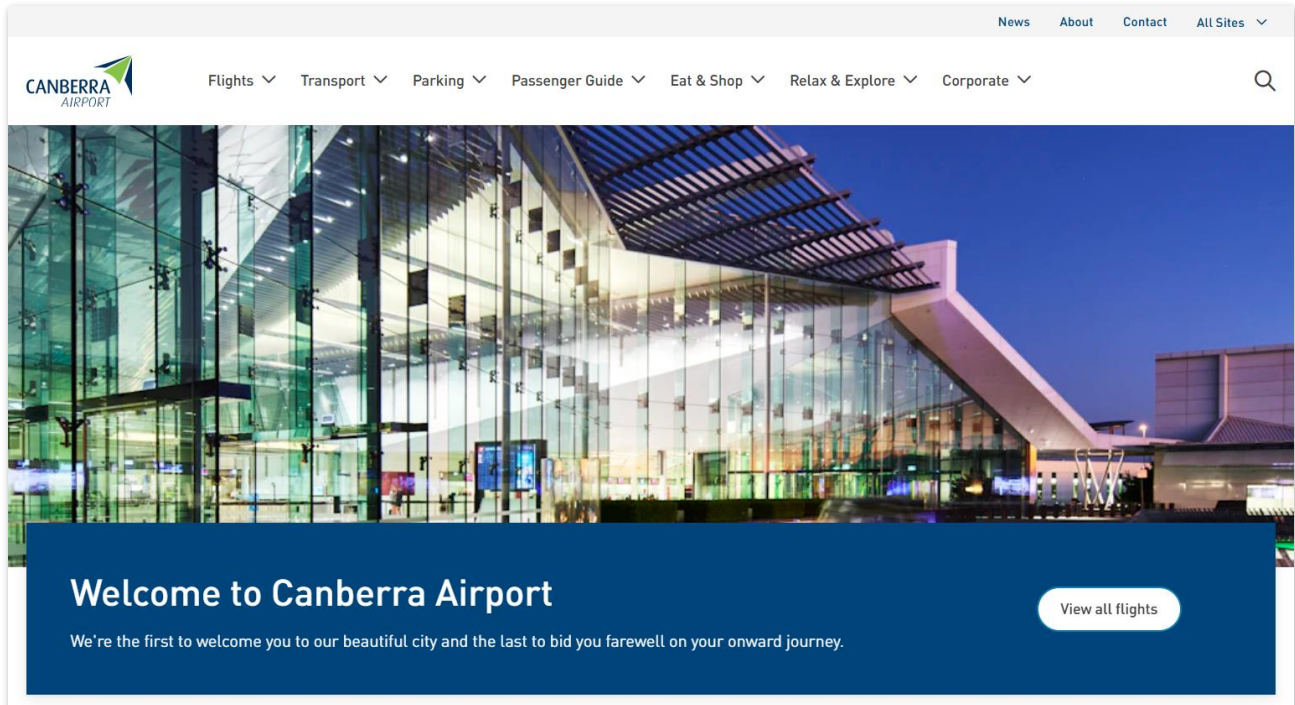


Image 2: Home page of the Canberra Airport website with the 'Contact' page in a prominent position to support customers provide feedback.

To support customers provide feedback through the website, Canberra Airport collaborated with Userway to include an accessibility widget across the site. The widget provides barrier-free access to

online content for every customer, with the ability to tailor their experience in line with their accessibility needs. A variety of features are included in the widget to support those customers who require special assistance or attention, such as larger text, screen reading and hiding images. With more than 2.2 million visitors to the website each year, Canberra Airport recognises the value of the widget as an additional tool to meeting the needs of customers.

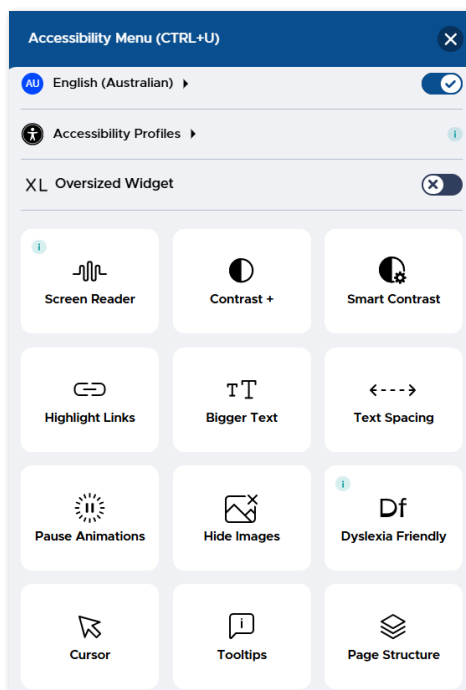


Image 3: Options available on the widget to improve accessibility on the Canberra Airport website.

The airport's social media accounts are also an ideal platform for feedback to be provided by customers. Through engagement on posts or direct messages, members of the public can engage in real time with Canberra Airport employees. If a matter cannot be resolved immediately, it will be escalated to a specialist staff member or third-party for further follow-up.

For those who do not have online access or prefer speaking with a Canberra Airport representative in person, the customer service office is located on the ground floor adjacent to the arrivals terminal. Staffed from 5:00am until after the last flight arrives each evening, the CSOs provide the necessary support and assistance to those seeking to provide feedback. This is in addition to Canberra Airport's contact details being included in a variety of publicly accessible publications, including the Yellow Pages, local and national newspapers and community newsletters.

Canberra Airport encourages customers to share their feedback without judgment or reprisal. By providing complaints, compliments and general enquiries, customers offer valuable insights about areas of the airport which are delivering exceptional service and those that may require further attention or investment. This is what ensures continuous improvement in service and delivery across Canberra Airport. From the traditional airfield and passenger terminal functions to the retail centres and carparks, customer feedback and enquiries provide the benchmark necessary for the airport to continue to build on the commitment to delivering excellent customer experience.

Every piece of feedback received by Canberra Airport is different, so the time to resolve a concern can vary depending on the issue raised by a customer. The time it takes to resolve a matter is determined by factors such as the complexity of the issue, the parties subject to the feedback and the availability of information to progress an investigation.

All items of feedback are assessed before being directed to a specialist team for investigation and response. A response rate target of 100 per cent to each item of feedback has been set. Over the last three reporting years, this target has been met, ensuring that every customer who makes contact can be assured that their enquiry will be dealt with in a prompt manner.

Since 2011, Canberra Airport has published information on its website detailing the number of complaints, compliments and enquiries received each quarter and the number of these which received a response. The data from the last four reporting years demonstrates that the number of items of feedback received by Canberra Airport has been extremely low, particularly when compared with the number of customers making use of the airport.

Year	Items of feedback	Response rate	Annual passengers	Customers providing feedback
2021	105	79%	1,024,019	0.01%
2022	48	100%	2,437,607	0.002%
2023	73	100%	2,769,430	0.003%
2024	93	100%	2,797,167 ^a	0.003%

Table 1: Comparison between the number of items of feedback received and customers using Canberra Airport each year since the COVID-19 pandemic.

Canberra Airport has a proven record of providing a seamless experience for customers to lodge feedback and responding to all forms of enquiry in a timely manner. The Proposed Right 6 reflects the process already applied by Canberra Airport which encourages customers to share their complaints, compliments and enquiries without fear of receiving an adverse response. The contributions and opinions provided by customers have guided many of the significant decisions made at the airport. Canberra Airport supports Proposed Right 6 in-principle but encourages the AIOS to consider the following suggestions which would increase the overall effectiveness of the right for customers.

The proposal to implement a standard timeframe that feedback will be acknowledged and responded to is sound, however, Canberra Airport believes the target of 24 hours to acknowledge and 30 days to resolve may not always be achievable. There may be instances where feedback is lodged by a customer at the weekend or on a public holiday and the reduced operational capacity of industry participants on these days may not guarantee an acknowledgment within 24 hours. There is some ambiguity as to whether the 24 hours referred to in the *Consultation Paper* relates to a business or calendar day. Canberra Airport suggests that a target of two business days to acknowledge feedback may be more appropriate. This will provide a clearer benchmark for customers and industry participants than the proposed 24 hour target.

^a 12 months to November 2024.

Due to the nature and complexity of some feedback, it may take more than 30 days for a matter to be resolved. Although a target can be helpful for customers to appreciate the expected wait time for a response, it can also place pressure on industry participants to comply in an effort to avoid penalties imposed by regulators. This may result in industry participants expediting investigations to meet timeframes. What then may occur is that crucial steps are overlooked, therefore, preventing a thorough and transparent response to the concerns raised by customers. Canberra Airport proposes that a target of 60 days would be more realistic for industry participants to adequately investigate and resolve concerns and complaints raised by customers. Both the United Kingdom and European Union schemes have adopted similar timeframes for industry participants to investigate and respond to complaints. If a customer is not satisfied with the response, then it would be appropriate for them to escalate their concerns to the Aviation Industry Ombudsperson.

A central objective of Canberra Airport's mission is to deliver an exceptional customer experience for those using the airport's facilities. If this does not occur, a seamless process has been implemented for customers to share their feedback and concerns, knowing they will receive a thorough and considered response. The sentiments outlined in Proposed Right 6 reflect the level of customer service that has been offered by Canberra Airport for more than 25 years. With further consideration of the response timeframes, Canberra Airport believes that this right will provide customers with a greater level of assurance that any feedback they provide to industry participants will be responded to in an appropriate and respectful manner.

CONCLUSION

Canberra Airport values the opportunity to make a submission on the draft Charter. As has been articulated, it would be appropriate for the Charter to be limited to airlines given the overwhelming majority of complaints from aviation industry customers relate to services that airlines have responsibility for. If the AIOS decides that the Charter will be applied to airports too, then there must be consideration of the refinements proposed in this submission. This will guarantee that clear accountability and appropriate regulatory measures are implemented. In its current iteration, the Charter is too ambiguous and will create confusion for industry participants and customers.

Canberra Airport has a strong record of delivering excellent customer service and providing accessible and inclusive facilities that support all customers during their journey through the airport. If the Charter is applied to airports, Canberra Airport is confident that it will exceed the obligations set by the AIOS due to its long-standing commitment to supporting customers utilising its facilities.

For more information, please contact Canberra Airport's Government Relations and Policy Advisor, Jordan Fallon, by emailing [REDACTED] or phoning [REDACTED]

