

# GetAboutAble Response to Aviation Green Paper November 2023

GetAboutAble applauds the prominent consideration of disability access in the Aviation Green Paper, particularly in contrast to the Terms of Reference circulated in February 2023. The aviation sector in Australia plays a pivotal role in ensuring access to essential services and the Visitor Economy, and barriers to people with disability accessing air travel is a critical problem within the current aviation industry.

Specifically, a key issue identified in the Green Paper is the clear evidence that airlines and airports are not delivering the services that enable appropriate access to services for people living with disability. With the aim of addressing this issue, GetAboutAble offers the following comments in response to questions raised in the Green Paper:

## *Chapter 2 – Likely future directions out to 2050*

*· Are there any other trends the Australian Government could add?*

Accessible Tourism - Nearly 90% of accessible tourism demand is unmet and this tremendous business opportunity is being recognised, with exponential growth in accessible tourism over the last 2 to 3 years, including through:

- Austrade's THRIVE 2030 strategy for the Visitor Economy including several recommendations to address the significant opportunities provided through accessible tourism,
- Tourism Australia including accessible tourism as one of three foundation issues, along with sustainable tourism and indigenous tourism, and
- Queensland's declaration of 2023 as the Year of Accessible Tourism with \$12million in funding for accessible tourism initiatives.

Exponential growth of the accessible tourism sector will likely continue as people with disability are more easily able to participate in the visitor economy due to increasing accessible tourism options (self-perpetuating snowball effect), accelerated by the lead up to the 2032 Olympics and Paralympics.

## *Chapter 3 – Airlines, airports and passengers – competition, consumer protection and disability access settings*

*· What types of data and analysis should the Australian Government produce to support aviation competition outcomes?*

In order to address the clear evidence that airlines and airports are not delivering the services that enable appropriate access to services for people living with disability, data should be collected and analysed on:

- The numbers of passengers with accessibility needs travelling by air and the type of need (eg. mobility, hearing, vision, neurodiversity including

intellectual and psychosocial disabilities, and hidden disability). Note that individuals can have more than one type of disability.

- The types of accessibility aids used by passengers, how many are transported on aircraft and how they are transported (in cabin with passenger, in cabin stowed in overhead compartment or aircraft closet, or under cabin with luggage).
- How many accessibility aids are damaged, how much it costs to fix/replace them, how long the repair takes, and how the passenger “makes do” while the aid is being repaired.
- How many complaints are received from people with disability relating to treatment by airline/airport staff, and how long it takes for the complaints to be resolved.
- The numbers of potential passengers who are unable to travel by air due to an accessibility need (eg. wheelchair not able to be carried on smaller aircraft, or passenger unable to transfer to seat (lack of EagleLift) or unable to sit in an aircraft seat due to lack of torso support.

*• What should the Australian Government take into account in designing the terms of reference for the proposed Productivity Commission Inquiry?*

The proposed Aviation Productivity Commission Inquiry Terms of Reference should include ability to investigate and report on opportunities to:

- Increase value of the aviation industry, both in terms of financial benefit and passenger well-being, and
- Increase accessibility and inclusivity of the aviation industry, both for passengers and employees.

*• Should the Australian Government look to revise current consumer protection arrangements and, if so, through existing or new mechanisms?*

Yes, and those arrangements should include specific provisions to ensure equity of access to aviation for people with disability, including protection against damage to mobility aids and other accessibility equipment.

*• Would an expanded remit for the Airline Customer Advocate to educate customers on their legal entitlements be useful?*

Yes, and that remit should include specific provisions to ensure equity of access to aviation for people with disability, including protection against damage to mobility aids and other accessibility equipment. The Airline Customer Advocate should include representation from the disability community, which could be a representative from the Aviation Access Forum (AAF). This would complement rather than replace the important work of the AAF, which should be strengthened with a clear mandate and power to implement initiatives in the aviation industry that ensure people with disability have equitable access to aviation.

- *Would policies pursued in other jurisdictions – such as a Passenger Bill of Rights or a stronger ombudsman model – deliver benefits to Australia’s aviation sector?*

Any Passenger Bill of Rights or a stronger ombudsman model must include provisions to explicitly protect the rights of people with disability to access aviation in Australia equitably.

- *What further improvements can be made to the Disability Standards for Accessible Public Transport to accommodate the unique requirements of air travel?*

The Disability Standards for Accessible Public Transport need to include the unique requirements of air travel, including key performance indicators and penalties for underperformance.

- *What improvements can be made to aviation accessibility that are outside the scope of the Disability Standards for Accessible Public Transport?*

Airline and airport operators should develop a common user experience from ‘kerb to aircraft’ by identifying where responsibility lies for assistance of passengers across the whole journey, and the types of assistance for passengers available. Furthermore, there should be standards for accessible booking systems, including booking of attendant carers, assistance animals and accessibility aids such as wheelchairs.

- *What are the specific challenges faced by people with disability wishing to travel by air in regional and remote areas?*

The significant challenges faced by people with disability wishing to travel by air generally are compounded in regional and remote areas. Smaller planes, lack of aerobridges, and a paucity of staff experience with passengers with disability mean that there are even more barriers to air transport in regional and remote areas than the already difficult situation in cities.

- *How can Disability Access Facilitation Plans by airlines and airports be improved?*

Every airline and airport operating in Australia should have an operational **Disability Action and Inclusion Plan**, with key performance indicators and clear assignment of responsibility for implementation. GetAboutAble has developed a **suite of free resources** to support organisations to develop an effective Disability Action & Inclusion Plan (DAIP). The resources can be downloaded from **<https://getaboutable.com/businesses/daip-lp/>**.

- *How should the Aviation Access Forum (AAF) be restructured to be more effective and better able to drive and enforce change to address issues faced by travellers living with disability?*

The AAF (currently a consultative forum on disability access issues in Australian

aviation, comprising government agencies, the disability community and airline and airport operators) **should be strengthened to have a clear mandate and power to implement initiatives** in the aviation industry that ensure people with disability have equitable access to aviation.

#### Chapter 10 – Future industry workforce

- Would an analysis of future skills and workforce needs help position the aviation industry to pro-emptively respond to emerging needs?
- What role can reforms to skilled migration pathways play in addressing immediate aviation personnel shortages?

Any consideration of industry workforce should include strategies into employment for people with disability. Programs such as **EmployAbility** should be implemented by all airports and airlines in Australia. This should be as important as skilled migration pathways in addressing aviation personnel shortages.

Further to the above answers posed in the Aviation Green Paper, GetAboutAble conducted a qualitative survey of travellers with disability that sheds light on the challenges faced when it comes to air travel. **75% of survey respondents revealed that they had either forgone or avoided trips that involved air travel due to these challenges.**

It is encouraging that **if the barriers to air travel were addressed, all respondents expressed a willingness to take more flights, with an average increase of 4.2 flights per year.**

Here are some of the key suggestions we gathered to ensure travellers with disability are treated with dignity and respect by the aviation industry:

1. There is a need for more focused attention on travellers with disability throughout the entire travel experience, **from booking to arrival** and a strong need for **consistency across airlines**.
2. The **overall process of booking, boarding, and navigating the airport should be simplified** and made more accessible.
3. **Airlines AND airport personnel, including security, should receive comprehensive training in disability awareness** to ensure they can assist travellers with disability effectively.
4. It is a matter of dignity and respect that **accessibility equipment checked in as baggage be handled with the utmost caution** as in most cases, travellers with disability simply can't continue their trip with damaged or lost equipment. **Damage to a wheelchair is as significant as breaking a passenger's legs.**
5. Airlines should ensure that they have **multiple booking system options** (phone, website, etc.). They also could assign a dedicated phone line to

people with disability to make bookings to reduce waiting times and streamline the booking process.

6. Providing **EagleLifts should be compulsory at all airports**, and **comfortable transit/aisle chairs** with padded backrests, while adhering to weight and collapsibility requirements, can enhance passengers' comfort when needed.
7. Airlines should establish **clear, transparent and uniform policies** for all accessibility issues, including **regarding assistance animals, with input from handlers**. These policies should be readily available to the public, and staff should receive adequate training on them.
8. For Travellers with Mobility Access Needs:
  - a. Provision of motorised wheelchairs for use within airports could greatly enhance mobility and autonomy.
  - b. Passengers should have the option to remain in or with their mobility aids (E.g. wheelchair) during the flight, ensuring their comfort and independence. **Enabling passengers to sit in their own wheelchairs during flights** would be a huge improvement to address comfort and accessibility concerns. In the US, significant progress towards this is being done by Delta Airlines, All Wheels Up and others .
  - c. All flights should be equipped with **accessible toilet options** available for those who require them. All airports should have Changing Places accessible toilet facilities with hoists and adult change tables near gates.
  - d. Airlines should ensure that their ticketing system accurately reflects the number of wheelchair users on each flight to prevent overbooking since they impose limits on the number of wheelchair users per flight. This limit should be revised, especially for longer flights.

Our survey results aren't exhaustive but we know that if the Aviation Industry adopted these suggestions it would lead to a more inclusive and accommodating aviation sector, ensuring that all Australians can access air travel and the essential services it connects them to.

GetAboutAble appreciates the opportunity to comment on the Aviation Green Paper and is available for further discussion if needed.