Submission to Consultation on the Aviation Green Paper – towards 2050

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Background

The Aviation Green Paper: Towards 2050 presents an opportunity to enhance accessibility in Australian aviation, particularly for people with intellectual disability. Ensuring accessibility within aviation is crucial for social inclusion and equality. Currently, aviation services and settings often overlook the specific needs of people with intellectual disability, creating barriers to their full participation in air travel.

About NSW CID

NSW Council for Intellectual Disability (CID) is a systemic advocacy organisation that works to ensure all people with intellectual disability are valued members of society with the same opportunities as everyone else. CID has been a leader in promoting disability rights for more than 60 years.

People with disability are at the front and centre of everything we do – they are decision makers, board members, staff members, and spokespeople. We work to build a community that protects rights, includes everyone, and supports people well. We focus on issues that people with intellectual disability tell us are important, such as the NDIS, health, jobs, education, safety, and transport.

CID promotes and protects human rights. We help people with disability to be heard. We speak up on the big issues and campaign for change. We provide advice to government and a diverse range of organisations on how to be more inclusive thereby ensuring that our society is equal and accessible.

About this Submission

This submission was co-authored by CID staff with and without intellectual disability who have experience of regional, interstate, and international travel. Anecdotal reports of transport issues experienced by CID members with intellectual disability are reported where relevant.

This submission focuses on the questions related to people with disability as outlined in Chapter 3.3: Airlines, airports, and passengers – competition, consumer protection and disability access settings of the Green Paper. We address the following questions mentioned in the Green Paper:

- What further improvements can be made to the Disability Standards for Accessible Public Transport to accommodate the unique requirements of air travel?
- What improvements can be made to aviation accessibility that are outside the scope of the Disability Standards for Accessible Public Transport?
- What are the specific challenges faced by people with disability wishing to travel by air in regional and remote areas?
- How can Disability Access Facilitation Plans by airlines and airports be improved?
- How should the AAF be restructured to be more effective and better able to drive and enforce change to address issues faced by travellers living with disability?

Key Issues for Accessibility

Wayfinding

Universal Design in Signage

Signage often lacks universal design principles, making it challenging for people with intellectual disability to navigate domestic airports. Each airport uses different signage, often based on the 'brand' of the airport. For example, this can include different colours and pictograms. This creates confusion due to the inconsistency.

Flight Information Screens

Our staff and members with intellectual disability have told us that the flight information screens are too small and change too quickly. Small flight information screens contribute to excessive crowding and a sensory overload as people move closer to try to read it, making it difficult for passengers, especially people with intellectual disability, to access flight information.

Gate Number Signage

Gate number signage is often poorly designed and placed, with small numbers, making it hard to find and read. Difficulty in locating the correct gate can lead to missed flights and increased stress.

Personnel Assistance

The absence of airport staff specifically trained to assist passengers with disability leads to a lack of support during airport navigation. This can result in passengers missing important announcements, having difficulties finding their way around the airport, and an overall stressful airport experience.

Time Management

Many people with intellectual disability require additional time to complete tasks like checking in, sorting out their items for security clearance, and finding their way to the correct gate. The standard airport processing times do not accommodate this. This can cause rushed situations, leading to high anxiety and potentially missed flights.

Quiet Rooms

Quiet rooms provide sensory-friendly spaces in airports for passengers prone to sensory overload. Quiet rooms are available at some airports and should be provided at all airports in Australia.

Elevator and Escalator Size

Current elevators and escalators are often inadequate to accommodate the high volume of passengers and their luggage, particularly during peak travel times, causing crowding. This can lead to accessibility and safety concerns for passengers with intellectual disability, who may need more space and time to use these facilities. Our staff and members have reported this is of particular concern at Sydney Airport.

Recommendations

1. Redesign airport signage to align with universal design and Easy Read standards. This should include pictograms, larger fonts, contrasting colours with good luminance contrast, and straightforward language.

2. Install larger, high-contrast screens in multiple, easily accessible locations to avoid crowding and increase readability.

3. Improve visibility and readability of gate number signage as per recommendation 1.

4. Train and deploy a dedicated team of assistance staff who are easily identifiable (e.g., with distinct uniforms) and knowledgeable about the access needs of people with intellectual disability. This team should be available throughout the airport to provide personalised assistance.

5. Allow additional time for check-in and boarding processes for passengers with intellectual disability by having dedicated staff for people with disability to check in and a dedicated lane at security.

6. Introduce quiet rooms to all airports in Australia.

7. Upgrade elevators and escalators to accommodate higher passenger and luggage volumes.

On-board Experience

Misunderstandings and Mistreatment

The issue stems from a widespread lack of understanding about intellectual disability among airline staff and passengers. This can manifest in various ways, from assuming their behaviour is a sign of intoxication to misinterpreting a passenger's needs or abilities.

Such misunderstandings can lead to inappropriate and potentially humiliating responses, including unwarranted reprimands or, in extreme cases, removing a passenger from the flight. This not only causes immediate distress and inconvenience but can also have long-lasting psychological effects, including anxiety about future travel.

Case Study

Michael (not his real name), a passenger with an intellectual disability, experienced a distressing incident during recent air travel. The flight was diverted to another major city, and he did not understand what was happening. He asked staff on the flight to explain. He did not understand what they were communicating and continued to ask for help. He was perceived as intoxicated by airline staff due to the way he spoke, which is a characteristic of his disability.

Without seeking clarification or considering other potential reasons for his speech, the airline staff decided to remove Michael from the flight. He was escorted from the plane by Federal Police. Other passengers were offered accommodation and a flight the next day; however, Michael was not and slept in the airport that night. Michael had to pay for an additional flight the next day, which was a significant financial imposition on him. Michael faced embarrassment, distress, and discrimination due to this misunderstanding. It not only affected him during the incident but led to a long-term reluctance and fear of air travel.

The incident underscores a significant gap in the understanding and awareness of airline staff regarding the nature of intellectual disability and the need for training.

Across many settings in the transport industry, inclusion policies and staff training often focus on physical and sensory disabilities but overlook people with intellectual disability. It is important to address this because people with any form of disability should be able to access reasonable adjustments, whether or not there is any visible identifier that they have a disability. Our experience is that staff training which is co-designed and co-delivered by people with intellectual disability leads to improved awareness amongst staff with flow on to altered attitudes and improved services. Such improvements can benefit many customer groups.

Unannounced Seat Relocation

Passengers with intellectual disability, who often rely on routine and predictability, can be significantly disoriented by sudden changes like unannounced seat relocations. These changes can be due to overbooking or operational adjustments that staff might not adequately communicate to affected passengers.

Such changes, when not communicated properly, can cause significant confusion and anxiety for people with intellectual disability. It disrupts their sense of security and can make the flying experience highly distressing, especially if the new seat does not meet their accessibility needs.

Difficulties During Disembarking

The disembarking process can be particularly challenging for passengers with intellectual disability, who may need more time to process instructions and physically navigate the aircraft. The general rush of disembarking can exacerbate this issue.

The disembarking rush can lead to heightened anxiety and a sense of being overwhelmed, potentially leading to panic or physical accidents of people with intellectual disability. The impatience of other passengers can further compound these feelings, making the disembarkment experience distressing and undignified.

Recommendations:

1. Enhanced Training for Airline Staff: Implement an in-depth training program for all airline personnel, including flight attendants and gate agents, focused on recognising and appropriately assisting passengers with various disabilities, including intellectual disability. Involve people with disability in developing and delivering training programs to provide authentic insights and strategies.

10. Develop clear policies to prevent unjust treatment of passengers with disability, with consultation with people with different forms of disability.

11. Ensure any seat relocations are decided and communicated considerately.

Booking Process and Ticketing

Self Check-In Challenges

Many passengers with intellectual disability face difficulties with automated self-check-in systems, which often involve complex interfaces or rely on precise information input, like exact name spellings. These systems can be non-intuitive and challenging for those struggling with technology. They often require two-factor authentication, which is not accessible. The instructions for using the system, and what to do next, are often cognitively inaccessible.

This can lead to frustration and overwhelm for the passenger, who may require additional time and assistance to complete a task like this. It can also cause delays and increased anxiety, particularly in busy airport settings with pressure to move quickly.

Dependence on Human Assistance

There is a significant reliance on human assistance for check-in processes by passengers with intellectual disability, who may have limited use of smartphones. Many people with intellectual disability find that processes like SMS verification pose a barrier due to the complex language used and pressured time frames. These systems typically do not consider cognitive accessibility for people with reading difficulties or other cognitive access needs.

This dependence can lead to a sense of helplessness or a lack of independence. It may also result in longer waiting times and the potential for these passengers to feel singled out or different from other travellers using automated systems.

Automated Systems vs Human Assistance

Automated systems, while efficient for many, often do not cater to the diverse needs of passengers with intellectual disability. These systems typically lack the flexibility or adaptability required.

The over-reliance on technology can alienate passengers with intellectual disability, making them feel excluded from the mainstream travel experience. It can also lead

to increased reliance on accompanying family members or caregivers, reducing a person's autonomy. Providing an option for human assistance with such tasks, without substantially increasing the wait time required, is a reasonable adjustment for people with disability.

Recommendations

8. Simplify self-check-in: Revamp self-check-in systems to be more intuitive, with simple instructions, clear language, and supportive prompts, in line with Cognitive Accessibility in W3C Standards[1].

9. Increase Availability of Staff Assistance: Ensure well-trained staff are always available at check-in areas to assist passengers with intellectual disability. The staff should be easily identifiable and approachable. They should be trained in how to respectfully communicate with people with intellectual disability, as well as people with other types of disability.

10. Personalised check-in experience: Offer a personalised check-in service for passengers with intellectual disability, where a dedicated member of staff can assist them throughout the check-in process.

11. Introduce alternative verification methods: For passengers who struggle with cognitive function tests for authentication, reading or technology, offer alternative verification methods in line with World Wide Web Consortium (W3C) Accessible Authentication (Minimum) (Level AA)[2] that do not rely on SMS or digital confirmation.

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[1] World Wide Web Consortium (W3C). "Cognitive Accessibility in W3C Standards." Retrieved from https://www.w3.org/WAI/cognitive/#cognitive-accessibility-in-w3c-standards.

[2] Accessible Authentication (Minimum) (Level AA), https://www.w3.org/WAI/WCAG22/Understanding/accessible-authentication-minimum

Disability Access Facilitation Plans

Lack of Specific Measures for people with intellectual disability

From our review of airlines' Disability Access Facilitation Plans (DAFPs), there are no specific measures or accommodations tailored to the needs of passengers with intellectual disability. These plans often focus more on physical and sensory disabilities, overlooking the unique challenges faced by those with intellectual or cognitive disability.

This omission can lead to inadequate support and services for people with intellectual disability, making air travel more challenging and stressful. Without clear guidance and measures tailored to their needs.

The information provided in current DAFPs is often complex and not presented in an easy format. This complexity is overwhelming for individuals with intellectual disability, who may require information to be broken down into simpler, more understandable parts.

The lack of 'Easy Read' versions of DAFPs can lead to confusion, exclusion and a lack of awareness of available services and rights among passengers with intellectual disability. This can result in not accessing available support, diminished independence, and an overall more challenging travel experience.

Recommendations

12. Inclusion of specific intellectual disability measures: Require DAFPs to include specific measures and accommodations for passengers with intellectual and cognitive disability.

13. Require 'Easy Read' versions of DAFPs.

14. Training based on DAFPs: Train airline and airport staff based on the updated DAFPs to ensure they are well-equipped to effectively assist passengers with intellectual disability.

15. Feedback mechanism for continuous Improvement: Establish a feedback mechanism where passengers with intellectual disability or their caregivers,

can provide input on the effectiveness of DAFPs, leading to continuous improvement and updating of these plans.

16. Collaboration with disability advocacy groups: Engage with advocacy organisations and representative groups representing people with intellectual disability to gain insights and make the DAFPs more comprehensive and applicable to the access needs of people with intellectual disability.

17. Regular review and updates: Ensure that DAFPs are reviewed and updated regularly to reflect new research, emerging best practices, and feedback from passengers with intellectual disability.

18. Clear dissemination of information: Develop strategies for effectively disseminating information about DAFPs to passengers with intellectual disability, including through online platforms, at the airport, travel agencies and disability organisations.

19. Personalised Assistance Plans: Offer the option for passengers with intellectual disability to have a personalised assistance plan that can be communicated in advance to the airline and airport staff.

Aviation Disability Access Committee

We recommend the establishment of an Aviation Disability Access Committee to address the current shortcomings in effectively representing and advocating for the needs of passengers with disability. We would like this to be a statutory body, ensuring it has the authority and resources to make impactful changes in the industry.

The current Aviation Access Forum is tasked with addressing disability access in aviation. However, its capacity to achieve this is impacted by the infrequency of its meetings. The reference group has not convened in over a year, leading to stagnation in progress and responsiveness to emerging issues.

For these reasons, we recommend establishing a new statutory Aviation Disability Access Committee.

Recommendations

20. Establish a statutory Aviation Disability Access Committee to address the ineffectiveness of the Aviation Access Forum.

Disability Standards for Air Travel

The Disability Standards for Accessible Public Transport are presently undergoing revision. The current version contains almost no consideration of cognitive accessibilty. Going forward, these and any Standards applying to the accessibility of Air Travel must be developed and reviewed with rigorous consultation and co-design with disability advocacy groups, industry experts, and passengers with disability to ensure they are robust, comprehensive, and effectively address the specific needs of air travellers with disability.

Recommendations

21. Any disability Standard/s applying to air travel should consider the unique challenges in aviation and be developed through rigorous consultation and co-design with disability advocacy groups, industry experts, and passengers with disability.

Recommendations List

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