

Deafblind Australia Responses to Aviation Green Paper- November 2023.

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

- The standards as they currently exist are not comprehensive and neglect the disabling impact of information and communication environments that are not accessible.
- A similar level of detail that is applied to prescriptions around physical dimensions and physical access needs to be applied to accessing communication and information whilst in the airport environment or onboard the aircraft.
- There needs to be greater clarity given in the standards around how to achieve what is being prescribed. At present, the vague language of the standards and the pervasive lack of disability awareness among airport/airline staff would leave many at the front-line completely at a loss as to what their compliance with relevant standards looks like in practical terms. Part 27.1 of the standards state “General information about transport services must be accessible to all passengers” and Part 27.2 states “If information cannot be supplied in a passenger’s preferred format, equivalent access must be given by means of direct assistance.” There needs to be greater clarity and guidance by way of examples as to what is meant by “accessible information”, “preferred formats” and the types of in-person direct assistance that may be provided.

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

- Industry/sector wide initiatives need to be undertaken to bring awareness to the impacts of inaccessible information and communication. The impacts of inaccessible physical environments are well understood across the industry and standards and practices reflect this. The same cannot be said for inaccessible communication and information. Deafblind people report issues with flight updates and gate changes being announced via audio means only; difficulty reading departure/arrivals information due to size and colour; difficulty accessing visual information displayed at gates.
- Airports and airline staff need to be aware, flexible and ready to respond to travellers with a disability on the traveller’s terms and in a way that creates not just some level of access, but equivalent levels to that of the general travelling public. This requires knowledge of the principles of substantive equality, contemporary

understandings of disability (social model and human rights frameworks), basic understanding of common accessible formats (braille, easy read, colour inversion, large font), knowledge of relevant laws around assistance animals, avenues to access necessary in-person support that cannot be provided directly by staff (eg Auslan interpreters).

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

- Lack of services/equipment and lack of awareness among staff are compounded in regional areas where access to necessary equipment and training for airport staff may not be provided.
- The reduced service options in these areas also means that remedying delays caused by lack of access to the premises, services or information at the airport have potentially much more serious impacts on travellers and are more difficult to remedy by means of alternative travel arrangements.

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

- These plans are only as effective as the breadth of consultation that underpins them and the regularity with which they are reviewed.
- It is imperative that these plans are developed via meaningful engagement with a range of disability representative groups that cover a broad spectrum of disabilities and are informed/led by lived experience testimony.
- These plans then need to be reviewed and updated via similarly comprehensive consultations on a regular basis to ensure the information and directives are up to date and can be expanded as needed.
- Engagement with the Disability Access Facilitation Plan by airport/airline staff along with professional development and training in disability awareness needs to be a contingent part of workplans for all staff and updated regularly as part of ongoing employment conditions.

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?

- Membership of the AAF at present is not sufficiently broad. There is, for instance, no group representing blind or vision impaired people on the AAF, nor is there any

group representing the needs of users with dual sensory impairment or those who use Auslan (Australian Sign Language).

- Current group make up relies too heavily on the input of service provider groups and large, cross sector consortiums. It has been the experience of DBA to date that these large sector groups, whilst claiming to make representations that encompass the views of a range of member organizations, often neglect these views in favour of an organizational agenda and priorities that are internally defined and directed.
- Membership of the group should be rethought to ensure there are a broad spectrum of groups included that represent physical, sensory and intellectual disabilities that have a proven track record of representing the needs of their communities. Preference in selecting members should also be shown for those organizations that are led by people with disabilities.
- Terms of reference need to be updated to reflect terms of membership, meeting schedules and outcome measurements relating to the work of the group.