



Vision Australia Response to Aviation Green Paper: Towards 2050

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Introduction

Vision Australia is providing a response to the Aviation Green Paper – Towards 2050 to draw attention to some of the barriers that people who are blind or have low vision experience when using air travel, and also to offer suggestions for how the overall passenger experience can be improved and these barriers overcome. In our response we focus exclusively on the questions included in S3.3 of the Green Paper: Disability Access. Our response focuses primarily on the needs and experiences of people who are blind or have low vision, although we are very aware of barriers faced by other disability groups, and we are dismayed by information provided by the Australian Human Rights Commission and the Disability Royal Commission about the negative and sometimes extremely traumatic experiences that air travellers with a disability have reported.

In preparing this response we are mindful of the relevance of the Final Report of the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability. The report articulates an inspiring vision of an Australia that is truly inclusive of people with disability:

“a future where people with disability live free from violence, abuse, neglect and exploitation; human rights are protected; and individuals live with dignity, equality and respect, can take risks, and develop and fulfil their potential.”

Fundamental to the realisation of this vision is the incorporation into all areas of society of a positive duty to eliminate discrimination. The Commission explains:

“Achieving substantive equality requires more than making adjustments for one person. Positive action is required to remove systemic barriers. It means shifting the focus from a reactive model to one of preventing and eliminating systemic barriers for people with disability more broadly.”

Air travel is built into the fabric of contemporary Australia, and as such the aviation sector must play its part in creating a more accessible, equal and inclusive society. It must be seen and see itself as being impelled by a positive duty to remove systemic barriers – a duty that goes well beyond technical compliance with standards to encompass every aspect of the way the sector operates.

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

Aviation is a form of public transport, and as such falls within the scope of the Disability Standards for Accessible Public Transport (the Standards). As the Green Paper notes, there are various factors that distinguish aviation from other modes of public transport, such as the degree of regulation and unique safety and security requirements. The “special case” nature of aviation has given rise within the aviation sector to a perception

that aviation is not, or should not be, required to comply with the Standards, unlike other modes of public transport. We not infrequently hear reports that air travellers with a disability feel or are made to feel that the airlines are doing them a favour by providing services such as Meet and Assist, instead of providing these services as part of their obligations under the Standards and disability discrimination legislation more generally. Moreover, airlines have failed to make their online websites and booking systems accessible through compliance with the Web Content Accessibility Guidelines – an unwarranted and longstanding disregard of the Standards that causes significant frustration for passengers, especially those who are blind or have low vision.

The Standards are rapidly evolving to reflect concepts such as whole-of-journey access and inclusion, the importance of co-design in the development of equivalent access solutions, and the need to work collaboratively with users with a disability to identify areas of improvement and compliance that will maximise passenger outcomes and safety. To date there is little evidence that the aviation sector is engaging seriously with the Standards in general and these evolving concepts in particular. As one of our clients recently commented:

“Being made to wait 45 minutes on a plane for assistance after all the other passengers have long since disembarked is not whole-of-journey, it’s not equivalent access, it’s not co-designed, it’s not dignified, and it’s not inclusive”.

Our view is that there are many aspects of the existing Standards that can and should be complied with by the aviation sector, and to this extent the Standards themselves do not need improving. We recommend that the sector undertake a comprehensive review of current compliance and implement a program of improvement. Only when the sector complies to the maximum extent possible with the existing Standards can a meaningful evaluation be made of aspects of the Standards that should be improved. For a similar reason we are not at present persuaded that there is a need for a separate standard dealing specifically with aviation. Many of the same underlying principles would apply in a specific standard, and if the sector finds itself unable to embrace principles such as whole-of-journey and co-design from existing standards then it is not at all clear how it would embrace them in a new standard. If there are areas of the existing Standards that need to be modified or expanded to cater for the unique aspects of aviation, then they should be included as a subset of the existing Standards.

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

Our view is that airports as key public transport infrastructure must have a much greater role in reducing barriers to air travel and improving the passenger experience for people with a disability.

Airport staff could, for example, be assigned to assist passengers with a disability to navigate key transition points along the whole-of-journey path, such as getting to and from the taxi dropoff/pickup point, accessing airport facilities such as bathrooms, cafes

and shops, and acting as a point of contact for passengers while they are waiting at the boarding gate. Currently these and similar functions are either not performed at all, or else performed inconsistently and unpredictably by airline staff. We are not implying that assistance provided by airline staff never meets passenger expectations, but in practice it cannot be relied on. One reason for this is that assistance is not always provided by airline staff whose sole responsibility is to assist passengers with a disability – assistance may be provided by staff who have other roles within the airline. The availability and quality of the assistance can thus be affected by the priorities and requirements of the other roles performed by the staff, and by varying levels of disability awareness training.

In the US assistance such as Meet and Assist is provided by airport staff rather than by the individual airlines that use the airport. We recommend that research be undertaken into the feasibility of introducing similar arrangements in Australian airports. There are a number of potential advantages in having primary assistance such as Meet and Assist provided by the airport staff rather than by airline staff, including:

- Airport staff would have more flexibility to assist passengers from the time of their arrival at the airport
- Because the same group of staff would be providing assistance to passengers irrespective of the airline they were travelling on there would be a more consistent experience
- The total number of passengers requiring assistance would most likely be sufficient to employ dedicated staff, which would allow for a greater degree of specialised disability awareness and assistance training
- More integration between experiences with security staff and assistance provided by other staff, leading to a better experience with security
- A central mechanism for passengers to provide feedback about their experiences
- A more effective pathway for implementing co-design in the development of policies and procedures relating to the provision of assistance to passengers with a disability
- Extension of the same passenger experience when travelling on airlines that operate under cabotage arrangements or that lack the domestic infrastructure to provide an appropriate level and quality of assistance and comply with requirements under the Standards or disability discrimination legislation.

Each of the above advantages implies that there are significant barriers at present, for example, an inconsistent experience within and between airlines, insufficient training for staff providing assistance in either a primary or secondary role, and no effective mechanism for reporting passenger feedback. So even if assistance services remain the responsibility of the airlines in the medium- to long-term, it will be necessary to find ways of addressing these current and not insignificant barriers that militate against a positive, affirming, safe and dignified passenger experience. We recommend that emphasis should be placed on adequate and consistent training for all airline and airport staff who provide assistance to passengers with a disability. Lack of appropriate training can not only contribute to a poor passenger experience but can also lead to injuries and compromise passenger safety.

One area that warrants extra attention is the impact of airport security checks on passengers with a disability. There are often miscommunications and misunderstandings between passengers with a disability and security staff, with staff demonstrating limited awareness of the needs and sensitivities of passengers, and passengers not understanding what they must do in order to comply with security requirements. There is no question that high levels of security are absolutely essential in the aviation sector, but a lack of transparency and dialogue can result in anxiety and distress for passengers. Passengers accompanied by assistance animals such as Seeing Eye Dogs appear to be more likely to have problematic experiences when interacting with airport security staff. Moreover, there is rarely any consultation between the aviation sector and organisations such as Vision Australia about the impact of current and proposed security measures on passengers who are blind or have low vision, which means that we are not able to convey accurate information to passengers or help create realistic expectations about what they can or should expect when negotiating airport security protocols and procedures.

A revitalised and repurposed Aviation Access Forum would be able to foster dialogue, consultation and feedback around the development and implementation of airport security arrangements that would comply with the needs of the sector but also minimise the negative impact on passengers with a disability.

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

For passengers who are blind or have low vision, the small airports typically found in regional and remote areas can be easier to navigate, and assistance from airport and airline staff can be easier to obtain. The lower levels of acoustic clutter and the general decrease in “busyness” and distraction when compared with larger, urban airports mean that interactions with security staff are also likely to be less fraught.

Nevertheless, these airports are prone to the same systemic barriers that can affect the experience of passengers with a disability, including inconsistent disability awareness training by airport and airline staff, allocation of responsibilities for the provision of assistance to staff who have other roles with competing priorities, and an overall absence of principles such as whole-of-journey, consultation and co-design. The impact of these barriers is likely to be greater on passengers who have more complex assistance needs.

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

While the motivation for these plans is undoubtedly a positive attempt to improve the experiences of aviation for passengers with a disability, in practice they have been largely ineffective and poorly understood by passengers and providers alike. Key reasons include the voluntary nature of the plans, the lack of consistent guidelines for their development and implementation, and a failure to utilise consultation and co-design frameworks that

have been integral to the development and evaluation of disability action and inclusion plans in other areas of public transport. We doubt that many people who are blind or have low vision would know that these access facilitation plans exist at all, and even those who know about them would find it difficult to identify any relationship between the content of the plans and their experiences as passengers.

Addressing these reasons will be an important part of making aviation more accessible and inclusive for passengers with a disability. Effective plans will need to include those elements that are recognised as being essential for other types of disability action plans, including clear goals and measurable outcomes, key performance indicators with clear lines of accountability, and robust processes for monitoring, reporting and evaluation.

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?

Vision Australia shares the widespread view in the disability sector that the Aviation Access Forum (AAF) is in urgent need of fundamental reform if it is to become the primary or even a relevant mechanism for consultation and collaboration between the aviation and disability sectors, and for driving and enforcing changes. Our strong view is that the AAF must:

- Be chaired by an independent chair from the disability sector supported by a resourced secretariat
- Report directly to the Minister
- Meet with sufficient frequency (such as quarterly) to allow meaningful ongoing dialogue and initiatives to occur and to prevent issues from languishing unaddressed
- Act as an effective mechanism for the receipt and escalation of feedback from disability organisations and individuals about the air travel experiences of passengers with a disability
- Be guided by Terms of Reference that create clear expectations that the Forum has authority to develop policies and enforce evidence-based change in the aviation sector.

A reformed AAF will need flexibility in the way it operates. For example, while it will need to meet frequently, it may decide that some meetings will involve only representatives from the disability sector, while others will also include a range of stakeholders from the aviation sector. It will be important for the AAF to comprise representatives from the aviation sector who have authority to progress recommendations from the Forum, and for representatives from the disability sector to be able to seek and convey the views and experiences of their various and diverse communities.

It will be necessary for the AAF to design appropriate research in order to gather data about the experiences of passengers with a disability to inform the development of

policies and recommendations for change. In other areas of public transport, surveys, focus groups and other research are often conducted by transport providers, but to date this approach has not been extended to the aviation sector.

A vital role of the AAF will be to drive cultural change that creates an environment in which aviation is seen by all those involved in the sector as subject to the operation of standards that confer rights on people with a disability and obligations on providers to uphold those rights. We believe that improvements in the framework for disability access facilitation plans can play a valuable role in promoting such cultural change. The AAF should therefore be tasked with overseeing the development of resources to assist airlines and airports develop and implement effective plans, and it should also receive and discuss annual reports on progress towards achieving the goals set out in the plans.

About Vision Australia

Vision Australia is the largest national provider of services to people who are blind, deafblind, or have low vision in Australia. We are formed through the merger of several of Australia's most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision is that people who are blind, deafblind, or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision, are deafblind or have a print disability, and their families.

Vision Australia service delivery areas include: registered provider of specialist supports for the NDIS and My Aged Care Aids and Equipment, Assistive/Adaptive Technology training and support, Seeing Eye Dogs, National Library Services, Early childhood and education services, and Felix Library for 0-7 year olds, employment services, production of alternate formats, Vision Australia Radio network, and national partnership with Radio for the Print Handicapped, Spectacles Program for the NSW Government, Advocacy and Engagement. We also work collaboratively with Government, businesses and the community to eliminate the barriers our clients face in making life choices and fully exercising rights as Australian citizens.

Vision Australia has unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 30,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of our organisation. Vision Australia is well placed to advise governments, business and the community on challenges faced by people who are blind or have low vision fully participating in community life.

We have a vibrant Client Reference Group, with people who are blind or have low vision representing the voice and needs of clients of our organisation to the board and management.

Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment.