

SCIA Submission to the Aviation Green Paper

Spinal Cord Injuries Australia (SCIA) thanks the Department of Infrastructure, Transport, Regional Development, Communications and the Arts for taking consultation in response to the Aviation Green Paper.

SCIA has been providing a dedicated advocacy and specialty knowledge service for people with spinal cord injuries and similar neurological conditions since 1967. SCIA was founded by people with acquired spinal cord injury and continues to employ many people with spinal cord injury and similar physical disability. People with disability make up over 25% of SCIA employees, and the SCIA Constitution requires at least 50% of SCIA Board Members to have a spinal cord injury (SCI). We currently employ 14 staff dedicated to our Policy and Advocacy work.

The SCIA advocacy team works to remove barriers and increase access to all services and facilities.

Below we answer the five questions posed in the Aviation Green Paper in responding to the needs of people with disability.

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

SCIA is of the view that the Disability Standards for Accessible Public Transport are ineffectual in not providing any guidance on aviation in responding to the needs of people with disability.

There currently is no consistency in how air travel operators and providers respond to the needs of people with disability. With regard to domestic air travel, each operator has their own distinct policy on assisting people with disability who have a need for mobility assistance. Unfortunately, as a result of operators setting their own guidelines on how to assist people, we have such variance in the assistance given. The onus therefore falls on the person with the disability to have a good grasp of what to expect in receiving assistance by the operator they have booked their flight with – very much in line with the *buyer beware* adage.

There is also a significant difference in how a low-cost carrier or operator will provide assistance to someone with a mobility impairment, placing a limit on the physical assistance provided. Essentially denying assistance to anyone with a significant disability who cannot independently, or with minimal assistance, transfer out of their own wheelchair, and into a modified airline provided aisle chair for transfer on the plane.

Further to the above, the assistance given to people with disability on their air travel journey, is subject to change depending on which airport they are starting their journey at – metropolitan or regional – and the destination of their travel. This comes down to the resources that are available at the airport they are travelling to or from. Smaller regional airports don't have the facilities or support available in larger metropolitan airports. This can very much influence the support received

such as having ground staff available to assist the passenger and whether or not specific pieces of mobility equipment are available such as a lifting hoist (eagle lift).

Another important issue in air travel that has to be considered is the size of the plane when making a booking, particularly for people with a disability reliant on power wheelchairs. The power wheelchair needs to fit within the cargo hold of the plane they are travelling on so smaller planes travelling to some regional destinations, as an example, will not be an option. Most mid-size jet engine planes will be suitable. However, when booking the flight, the passenger will need to know all of the dimensions of their power wheelchair: weight, width, length and especially the height. Some power wheelchair height dimensions will exceed the limits of the cargo hold size but it often needs to be explained to customer service representatives doing the booking that most modern power wheelchairs are not rigid and the height can be adjusted through tilting the seating position (tilt in space) backwards. They will also need to get a dangerous good certificate issued to cover the batteries of the power wheelchair. So these are some of the complexities that need to be covered off on for wheelchair users when making arrangements for travelling by air.

Any wheelchair user in need of physical assistance during the flight, such as help transferring in and out of their wheelchair, will also need to explain the degree of assistance needed. Unfortunately this isn't always able to be achieved during the booking of the air travel ticket. Often they have to make a follow-up call, using their booking reference number, to stipulate what assistance they need subject to the carrier they are flying with and what their specific policies are. The customer service representative needs to be mindful of recording the details of assistance needed. And this is where things can go wrong if this information is not properly recorded, or the information gets lost. The passenger is at the mercy of the customer service when they arrive at the airport for their flight, hoping that all necessary supports are lined up for a smooth journey.

Aviation-specific Disability Transport Standard

SCIA would support an aviation-specific disability transport standard that addressed the current shortcomings that makes air travel for many people with disability so stressful. We support the proposals put forward by the Public Interest Advocacy Centre (PIAC) for a Disability Standard for Air Travel that will include the following:

- Developed through a co-design process;
- Is based on the US Airlines Act, as a starting point (which, of the overseas jurisdictions we've examined is the most comprehensive);
- implemented quickly once drafted (without the dilatory transition/rollout periods that the Transport Standards have had).

Further to this, we would also support PIAC's proposal to empower the Australian Human Rights Commission (AHRC) to act as a regulator to proactively enforce those Air Travel Standards. We believe that the current regulatory framework is not working in the interest of people with disability and giving this function to the AHRC to oversee the Air Travel Standards would represent a marked improvement if it's given appropriate powers to do the following as proposed by PIAC:

- Gathering and publishing compliance data from airlines and airports;

- Inspecting airports and airlines to ensure they are complying with the Standards; and
- Taking enforcement action (such as entering into enforceable undertakings, or issuing fines) where non-compliance is found.

There are serious systemic issues that people with disability have experienced when travelling by air. These issues raised are not new, and have been around for a long time.

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

There has been significant reform over a number of years across disability policy which for the most part has been positive with an emphasis on taking a human rights perspective; people with disability have a right to access services and supports to the same degree that mainstream Australia takes for granted. However there appears to be a lack of knowledge and education from the aviation sector, especially at a front facing customer representative level, on responding appropriately to very basic requests for assistance.

People with disability travelling by air often report a lack of consistency with the assistance they have received on their trip; they might say that they had a good experience arriving at their destination but the response was completely the opposite departing from their home airport. As mentioned, each carrier has their own specific policy on assisting people with disability which is usually accessible by their website. Additional to that they have Disability Access Facilitation Plans. We are concerned that this information is not filtering through airlines to all levels of staff, including ground staff.

There is a role for basic disability inclusion training that is taken up by the aviation sector. This isn't rocket science – people want to be listened to and heard and receive an appropriate response. If there is a breakdown in service, how can it be rectified? Is there a workaround to a current problem that's going to get the person to their destination? And done in a timely fashion. If we have learned anything from responding to Covid, we need to consider contingency planning. Given the staff and resources available to airlines there has to be workable solutions that stops people with disability missing flights or waiting unreasonable times to be assisted or receive their wheelchair, as an example.

We think the aviation sector in general could benefit from the input of people with disability and disability representative organisations beyond the current formal arrangement of the Aviation Access Forum that brings together aviation stakeholders and disability representative organisations. Codesign can work in everyone's favour. There has been talk recently of developing a Code of Conduct for the sector. SCIA would support this if it is about improving service provision for people with disability.

The online booking system needs to be improved to allow people with disability to be able to book flights and put in all of their assistance needs, including details about their wheelchair. This has been a long-standing issue that is still not fully addressed. It shouldn't require a separate call to a hotline, after booking the flight using a reference number, often waiting hours, to then go through what assistance is needed for the journey. Having the ability to input the data online when booking the

flight makes things far easier and quicker. If there are follow-up questions needed, surely it's the role of the customer team to make a call to the passenger to finalise any detail?

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

There are many challenges people with disability face when travelling by air in regional and remote areas. First and foremost is a lack of resourcing both in terms of people available to assist (airline staff), and access to infrastructure on the ground (including equipment) as it relates to mobility assistance and wheelchair access, as clear examples.

Infrastructure at the smaller airports in these regional and remote areas don't have terminals with jet bridges to start with, which is the usual mode in a metropolitan area for how someone with access issues, including wheelchair users, enters the plane using a hoist (Eagle lift) or pushed in an aisle chair, which is narrow enough to move through the plane. So the only way that someone with any access issues can enter a reasonably sized jet plane, typical at a regional airport is using a portable lift that is wheeled into place to elevate to the plane door. Alternatively we have anecdotal feedback that the infrastructure used for loading cargo, such as a large industrial scissor lift with a platform or a similar such elevating platform has been used for transporting people with disability.

People with disability have to make a lot of inquiries and literally do research to find out what support will be available to assist them in a regional airport so they have some idea of what is likely to happen and feel reassured that they will safely make their trip whether it's departing or landing. This comes down to questions such as: is there ground crew to physically assist me? Is there a hoist available at this destination? Are there accessible facilities? There are a lot of scenarios that could play out in smaller airports if there is a breakdown in support or infrastructure. The level of training and knowledge of the staff when providing assistance, particularly when it is associated with returning or removing a power wheelchair to/from the passenger from/to the cargo hold. Understanding how to operate it and manoeuvre it into an appropriate position for the passenger and for entry into the cargo hold – all without damaging any part of the wheelchair is important.

The size of planes arriving and leaving regional and remote centres will have a large influence on who can travel through that centre. If you are a wheelchair user, this will depend on the size of the cargo hold of the plane and whether or not it has the capacity to transport the wheelchair. Larger power wheelchair users won't be able to travel in a plane if it can't fit in the cargo hold. The more regional a centre, the more likely that smaller planes will be doing the bulk of the trips. This is also true therefore of the availability of customer staff to help anyone with mobility assistance.

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

Disability Access Facilitation Plans (DAFP) are lengthy documents and each operator/carrier has their own DAFP. It is important that each organisation set out clearly their policy on assisting people with a disability when flying but it can't be expected that every passenger with a disability will be up to date on the latest policy that an airline has released. As outlined above, passengers are already



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navigating different procedures subject to where they are, geographically and where they are going in their destination – with each airport having their own set of procedures.

Information related to customer assistance for people with disability that is outlined on an airline's webpage is not always consistent with what is set out in their DAFP; so for the most diligent of passengers the information can appear confusing or contradictory. It's a lot of information for anyone to wade through to get as comprehensive an understanding as they can on what to expect when travelling with a single carrier. So if someone is travelling and it involves more than one airline, that's another DAFP and supporting information they have to get an understanding of.

We have to work towards greater consistency across the entire aviation sector in support of people with disability and that must include working towards a more consistent DAFP standard that all operators agree to. The status quo is not supporting people with disability on their travels and there are far too many horror stories with people being let down and receiving poor treatment.

It should also be pointed out that DAFPs are guidelines only, and as they often explicitly state, are subject to operational changes with no guarantees that the assistance outlined will be provided. If nothing else, this clause is the standard operating procedure for airlines. As everyone with a disability who has taken air travel knows, procedures do fall down.

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?

SCIA is a member of the Aviation Access Forum (AAF). The AAF is operated through the Department of Infrastructure, Transport, Regional Development, Communications and the Arts which holds the Chair and Secretariat functions for the forum. But as a forum with a broad stakeholder membership including disability representative organisations, it only meets twice a year and the current Terms of Reference are very limited in their scope. Given the broad representation of the forum, including government, airline industry, airport representation, and the disability community, it could be doing a great deal more to pursue positive outcomes and greater consistency in responding to the needs of people with disability.

The Terms of Reference need to be rewritten to give it greater obligations than just consultation, information sharing and acting as a feedback loop. It should be strengthened with a reporting function to government that looks to developing outcomes based on consultation and hopefully consensus building, however the government must play a role in working with the sector to work through systemic issues faced by people with disability. The forum has to meet more regularly than twice a year – this needs to be doubled.