

Chapter 2 – Likely future directions out to 2050

- What emphasis should the Australian Government place on these trends to help guide the future of the sector? Are there any other trends the Australian Government could add?

Disability is a rising trend that needs to be addressed. It is a promising sign that the Green Paper acknowledges the changes that need to be made and I hope to see this remain as a focus priority, including increased regulations to ensure that all stakeholders are required to follow through with the required changes.

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

- Should the Australian Government look to revise current consumer protection arrangements and, if so, through existing or new mechanisms?
- Would an expanded remit for the Airline Customer Advocate to educate customers on their legal entitlements be useful?
- Previous consultation processes have explored options to refine the passenger liability and insurance framework under the *Civil Aviation (Carriers' Liability) Act 1959* – do stakeholders still consider amendments to this framework are needed?
- 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?
- 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

As the Green Paper correctly identifies, the current issue with the AAF is that they have no ability to enforce their recommendations. It is vital to create a body to oversee the aviation industry and ensure that the airlines and airports are meeting their legal and ethical obligations to provide a fair service to all aviation passengers. This should include a stronger ombudsman model, and an expanded remit for the Airline Customer Advocate to educate customers on their legal entitlements, as well as incorporating the AAF, and providing scope for this oversight body to provide consequences for stakeholders who do not obey the appropriate aviation standards. The AAF should also be open to membership by a wider range of disabled travellers.

Information about a customer's rights also need to be easily available in a variety of accessible formats from the airline/airport websites and communicated to customers when issues arise, including how to escalate complaints when customers are unhappy with the service they have received.

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

It's ultimately more important that there are regulations, rather than in what format they are in. There are advantages both to the existing standards being amended or new ones being created, but one of these definitely needs to happen.

The development of kerb to destination disability access plans is vital, but needs to be mandated as these are not currently being created or used by airlines. These plans also need to be easily accessible by members of the public, and need to start much earlier at the enquiry stage.

It is vital that people with a variety of disabilities be involved in the creation of any new policies and standards, both by the aviation companies, and as part of this process.

Here is a list of inclusions I feel are vital to be included in new accessibility standards.

1. Provision of information

Airlines and airports must make it easy to find what their policies are, especially pertaining to accessible travel. Travellers frequently report issues where aviation industry staff tell them drastically different information about what their rights and requirements are, and are unable to advocate for themselves because it's impossible as a consumer to obtain copies of this information.

Internal training should also be required for relevant aviation staff to ensure they are also familiar with their companies own policies.

Lack of information also makes it hard to plan trips as a disabled traveller, because there is no certainty you will be able to travel as planned, due to the risk that at any stage of the journey something could be changed making the process inaccessible to you.

Clear information about what to expect during travel is especially important for some neurodiverse travellers. For this reason it should be required to make social stories about what to expect at all stages of the journey easily available on the company website or by request.

All airlines and airports should also be required to have a variety of means available to contact their accessibility liaison officers/teams, including over the phone and via email.

2. Availability of suitable flights

A major barrier for disabled travellers at the moment is the lack of available flights. This is especially true for electric wheelchair users, as most airlines will only take electric wheelchairs of a certain size on Airbus planes, and no longer run them on domestic routes. The airlines that do run Airbus' domestically don't have the assistive equipment for a wheelchair user unable to self transfer to board the plane, ultimately meaning that many electric wheelchair users just can't fly at all.

Another barrier for disabled travellers is that the airlines limit the number of disabled passengers able to travel per flight. This makes it especially difficult when trying to plan a trip for events, especially sporting events when it's necessary for entire teams to travel between locations.

It is especially difficult as currently even if you book an appropriate flight you aren't guaranteed it will stay that way, as the airlines will advise to call three days in advance to see if they are still planning to run the service with an appropriate plane type, as they won't guarantee they will honour the ticket you bought to help you reach your destination.

Disabled passengers should not be required to travel with a support person or refused access to travel because of their disability.

3. Booking process

Booking processes are often incredibly difficult for disabled passengers, often only able to be done over the phone with long wait times, and with operators that are not adequately trained on how to book flights for passengers with accessibility needs.

There should also be standardised processes about passengers who are unable to travel independently and need to bring a support person, and for those that travel with a service animal.

4. Pax requirement to provide information

People with accessibility needs are often required to provide a lot of information about their requirements at the time of booking their ticket, and then again at check in as this information has not been retained. Airlines should be required to have a more efficient system where only required information is collected, and where it is able to be communicated to all staff who need it during the journey, rather than the person with the disability needing to repeat themselves to each new staff member.

Travellers with a service animal should not be required to provide an airline with thirty days notice of intent to travel.

5. Accessible facilities at airport

Airports should be required to include disabled members of the community in their planning consultations, and to ensure all future upgrades of their facilities include services such as the following

- disabled travellers lounge for those that need assistance and have long layover times, often they are currently left unattended at a gate or random area of airport, especially an issue as often unable to get to a bathroom independently.
- Quiet rooms It's especially important for many disabled travellers to have a place that is quieter than the main passageways of the airport as travelling is already a very stressful and draining process and overstimulation can exacerbate a lot of disability symptoms.
- Changing places toilets near the gates so that travellers who need assistance to go to the bathroom can do so before and flight, as they are often unable to access bathrooms on the plane, and are on the aircraft for longer as they are required to board first, and disembark last.

- Assistance animal Toileting areas assistance animals are trained to toilet on command, so don't need much, but it's important to have an area where they can relieve themselves before and after the flight

6. Services received at airport

- Airlines should be required to provide passengers clear instructions on where and what time to check in. Passengers with disabilities should not be required to check in earlier than other passengers unless there are actual operational requirements for this.
- Check in staff need to be well educated on the companies disability action plan to ensure they provide correct information to the passenger and provide an efficient check in experience
- There needs to be consistent national security standards for all airports, especially regarding service animals. Service animals should not be separated from their Handlers, and Handlers should only be required to receive extra security measures such as pat down search for the same reason other passengers would (eg alarm sounds /irregular scan)
- Disabled passengers need to be allowed to take their own Mobility aids to gate, and also extra support people if needed even if those support people aren't flying with them.

7. Aboard the aircraft

- All airlines should be required to have an eagle lift to enable disabled passengers who can't transfer independantly to board the aircraft.
- Aircraft must be required to carry manual wheelchairs of an appropriate size. This would bring us in line with other countries such as America, the facilities to do this already exist, we are just not requiring airlines to use them.
- Similarly, new aircraft should be required to have accessible bathrooms, on-board wheelchairs and aisle seats with liftable arms
- Disabled passagers mobility equipment should not count towards their carry on baggage limit.
- As further technology to allow wheelchair users to fly in their wheelchair (eg air4all, all wheels up) becomes commercially available this should be compulsory to offer

8. Complaints process

In addition to the information provided above regarding why the complaints process needs to be improved for all passengers, it is especially important to have clear guidelines for what the process is when something goes wrong on a journey for a disabled passenger, especially when it involves them being injured or their assistive equipment being lost or damaged. This should not be the responsibility of the passenger to have their own insurance, especially for domestic journeys travellers need to know the airline will be responsible for the cost of repairing or replacing their mobility aid in a prompt time frame, and funding them to hire suitable replacement equipment until this happens.

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

Even as a wheelchair user in a major Australian city, flights to other cities can be impossible to access. This is outside of the issues raised above, but there are no flights that will accommodate electric wheelchairs, from airlines that have lifting machines that run from Melbourne to other major destinations such as Sydney, Hobart, Brisbane, Gold Coast, Adelaide. If this is the case for someone travelling from one of the most popular Australian airports, we can only imagine the extra challenges faced by someone more remote with less flights and less facilities at local airports.

6. Airport development planning processes and consultation mechanisms

6.2 Community consultation mechanisms

- How can the existing consultation framework be improved to facilitate efficient planning and development, while preventing environmental harm and ensuring continued access for aviation users?
- Are Community Aviation Consultation Groups (CACG) working for the community? What are good aspects, and what can be improved?
- Do the current master planning processes support all airport users, including general aviation?

These processes need to include disability consultation at all stages of development. This is where disabled traveller involvement is most vital to ensure airports have facilities that meet their needs.

Chapter 9 – Emerging aviation technologies

- How can we build on Australia's strengths to ensure that Australian industry in the sector is able to be competitive internationally?
- How could the Australian Government create an environment that fosters private investment in emerging aviation technologies?
- What regulatory roles in particular do stakeholders see as critical for the Australian Government to lead to enable the advantages of new technologies while managing the risks?
- How will priorities of Government agencies need to evolve as the uptake of emerging aviation technologies continues?
- Do Government policies and regulations need to change to better support growth in emerging aviation technology manufacturing?

It would greatly help the creation of new technology to allow for disabled people to travel more easily to provide financial incentives to companies willing to work on technology to assist with this, eg equipment to allow wheelchair users to stay in their wheelchair while on-board the aircraft. Australia is known as an innovator in many fields such as medical research, so there is no reason we couldn't also be here.

