

25 June 2008

Department of Infrastructure, Transport, Regional Development
and Local Government
GPO Box 594
CANBERRA ACT 2601

By Email: aviationstatement@infrastructure.gov.au

Dear Sirs,

Vision Australia was formed in 2004 through the merger of several leading Australian agencies that provided services to people who are blind or have low vision. We are now Australia's largest blindness and low vision agency, with a long history of professional service delivery. Our organisation's purpose is to provide assistance to people who are blind or have low vision so that they can access, and fully participate in, all facets of life. Vision Australia promotes awareness to government, government departments, community services and the general public about the barriers faced by people, who are blind or have low vision in a predominantly sight orientated society.

Vision Australia appreciates the opportunity to provide input into the development of The National Aviation Policy Statement and we structure our response around the five broad themes raised in the Issues Paper.

Aviation Industry

Vision Australia strongly believes that all aviation services must contain mechanisms to ensure accountability, responsibility and compliance under legislation such as the Disability Discrimination Act. This includes all airlines operating under Australian jurisdiction - domestically and internationally. As new carriers are introduced into Australia it is essential that they are accountable under Australian legislation.

It is appreciated that the growth in airline services is probably good for competition in Australia. However, although competition leads to lower prices, it is not uncommon for restrictions to be placed by cheaper airlines which negatively affect a person who

is blind or has low vision. For example, the airline may insist, with no good reason, that the person travels with a carer. This would involve an unwarranted additional cost to a person who is blind or has low vision. This certainly does not make these “cheap” airlines beneficial to this person. If lower priced airlines, with their limited services, are permitted to flood the Australian market the potential is there for a corresponding cutback on assistance services which will lead to an increase in discrimination towards people with disability.

Feedback from our clients indicate that there is already a lack of consistency in the level of assistance services offered to people with disability in the Australian aviation industry. Vision Australia is concerned that the growth in international aviation services will be accompanied by a corresponding growth in inconsistency in aviation services. As new airlines begin to offer services, overall consistency in services will not improve unless there are very clear guidelines put in place. For example, basic onboard safety information is not currently provided by all airlines in accessible formats such as Braille and large print. This concept has only been adopted by a few airlines, and even though these airlines have alternative format copies of the information, individual staff do not always remember to provide them.

An improvement in consistency in services is essential, across all international and domestic airline services. Staff in the terminals and also onboard airlines need to be given a minimum standard of awareness training – whether they are a crew from Australia or from an international carrier. A system needs to be put in place to allow airlines to police minimum standards of provider service. This would ensure consistent service, regardless of whether the traveller is flying domestically or internationally.

There are already inherent difficulties at the smaller regional airports for people with disability. International standards need appropriate facilities, however these may not be available at smaller airports. For example, there may be no staff or even tactile markings or signage to direct a person who is blind or has low vision. The meet and assist service offered at the larger airports may not be possible if the pilot is also the ticket collector and steward. If there is no on ground assistance then air travel is not accessible for a person who is blind.

It appears to be a standard code of practice that, no matter the size of the plane, a person who is blind is left on the plane until all other travellers have disembarked. It is appreciated that this is considered reasonable from the airlines perspective, but it does inconvenience a person who is blind or has low vision who, similarly to sighted peers, also has deadlines to meet. It is also the practice for that person to often be expected to be taken in a wheelchair through the terminal, even though there is no need as they have no mobility disability.

Aviation Infrastructure

Vision Australia strongly supports regular consultation with all stakeholders, including disability organisations, in order to build a truly accessible aviation industry. There is no such thing as a one-size-fits-all solution in relation to services for people with disability. A clear example of this is the current situation when airport staff insist a person who is blind is put in a wheelchair, even though that person has no mobility disability. A policy which states that anyone with a disability must travel in a wheelchair is geared towards meeting the needs of a person who has a mobility disability and is not applicable to someone who is blind or has low vision.

Aviation Safety

Vision Australia clients have commented on the lack of understanding of disability amongst many airline staff. This is particularly the case when it comes to basic onboard safety advice. As previously discussed, there are problems with obtaining onboard safety instructions in an accessible format. This issue however goes deeper than just access to the written instructions. The lack of understanding is displayed by flight attendants, when, for example, a traveller who is blind or has low vision is subjected to intrusive questioning on whether they are capable of putting on an oxygen mask, based purely on their vision impairment. These are questions which are not asked of other travellers. Airlines have indicated that this sort of questioning is to ensure compliance with CASA independent travel guidelines.

Customer and Community Protection

Vision Australia particularly wants to comment on section 4.4 of the issues paper, relating to The Disability Standards for Accessible Public Transport 2002 (the Transport Standards) and whether these standards are adequate. The Transport Standards are not adequate in relation to airline travel, as they do not specifically address barriers faced by a person who is blind or has low vision when travelling by air.

In regards to the current complaint mechanisms, although complaints in many cases are resolved satisfactorily, they are often resolved financially and confidentially. This may assist an individual traveller, but does not resolve the systemic barrier which continues to be faced by other travellers. It is an industry responsibility to make the complaint process transparent to ensure consistency and true resolution of complaints.

The committee reviewing the Aviation Policy is encouraged to read “Flight Closed” a report looking specifically at air travel in Australia for people with disability produced by the Public Interest Advocacy Centre (PIAC) and the Disability Discrimination Legal Centre (DDLC). This report is available on line (http://www.piac.asn.au/publications/pubs/rep2007123_20071201.html), or by contacting PIAC directly.

As mentioned previously, a person who is blind or has low vision faces many barriers in their air travel. For instance, they often face discriminating policies of individual air carriers. This may include a carrier insisting that a person with a disability travels with a carer. This is despite the individual being a regular traveller and their assurance that they can travel independently. There is a lack of dignity afforded the person with a disability by often ignorant airline staff members, whose lack of understanding may lead to interrogation. There is also a financial burden on the traveller, as the airline may insist on a carer but does not fund that carer.

There are also airline policies restricting the number of assistance animals per flight. These restrictions are unreasonable, as they do not allow a group to travel together if they have assistance animals, such as dog guides. They also limit travellers as to what flight the airline permits them to take. This easily translates to a situation where a traveller with a dog guide may be forced to wait lengthy periods before they are permitted onto a flight. This unacceptable situation is not seen as such by airlines; however it is difficult to imagine it considered acceptable if it was offered to a person without a disability.

Most airlines offer a meet and assist service which is available on request. However, this service does not begin until an individual reaches the check-in counter. Currently, a traveller is dropped off outside the terminal as vehicles cannot be left unattended. Vision Australia appreciates this is due to increased national and airport security. However this means that a passenger needs to find their own way into the terminal and check-in desks. In the case of a traveller who is blind or has low vision, assistance should be available from the drop off outside the terminal, through to the check in, through security, through to the gate lounge and then onto the plane itself. Additional assistance should be available at the arrival destination to assist with baggage pick up. This should be standard airline/airport policy and should not be considered a "favour" offered but a right for the traveller if they request it.

Many of the advances in technology at the airport increase the barriers faced by a person who is blind or has low vision when accessing the airport. For example, self-service electronic check-in facilities are now common in major airports. These are inaccessible for travellers who are blind or have low vision as there are no audible, tactile or Braille components on these machines.

Access to information is an area which is a barrier to a person who is blind or has low vision. This is not only information relating to their flight, listed on inaccessible LCD screens, but also information on safety issues. Access to information is a barrier, both in the terminal and on the flight. This includes signage, flight departure and arrival information, and wayfinding mechanisms such as changes in ground surface. On the flight, the barriers include no tactile indication of exit doors, no menus in accessible formats, no clearly differentiated hand soap/hand lotion in the toilets or even accessible controls on arm rests.

Braille versions of safety briefings have been offered by certain airlines for a number of years. Similarly, larger print versions of the briefings are available. Airline staff

also offer individual briefings, however these are not consistent. For example, on a recent domestic flight a Vision Australia client was given no safety briefing, or indeed offered any assistance, on the flight out of Sydney. However, she was given a detailed briefing, including being offered a Braille copy of the written information, on the return flight. It would appear to be individual flight attendants, rather than airline policy, that most affects the treatment given to people with a disability.

Many airlines do not offer accessible online booking services, which may mean that a person who is blind does not have access to special deal cheaper fares. A person who is blind should not be penalised for having to use telephone booking services. However, individual airline policies, such as Virgin Blue and Qantas, note this difficulty and therefore do not charge additionally for any person who is blind or has low vision and uses their telephone service. This should be consistent for all airlines.

A person who travels with a dog guide is unable to take advantage of the convenience of on line check-in because the system does not provide a mechanism to indicate the person is travelling with a dog guide. This means the individual and their assistance animal has to join the long check-in queue even if they have no baggage. Despite this necessity to speak with a customer service consultant, the person travelling with a dog guide is not guaranteed good seating. A dog guide can fit in any part of the cabin, however for the comfort of the dog, its owner and other passengers it is usually accepted by the airline that the person be given seats at the front of the economy section where there is more room for themselves and the dog. However this is not standard practice and Vision Australia clients travelling with their dog guides have reported that although they request these seats, and are even told in some instances that they have them, the reality is that they are seated further back in the plane. This appears to be unnecessary, and does impact negatively on the comfort of the traveller.

Aviation Security

Vision Australia understands that security screening is a necessity for all forms of travel. However for a person who is blind or has low vision the experience is often unnecessarily unpleasant. The airport security staff often display a lack of awareness of the nature and importance of adaptive equipment, and a lack of sensitivity of the vital role of mobility aids, such as white canes and dog guides. This could be minimised through ongoing disability awareness training for staff. A traveller often has to relinquish their aid, ie cane or dog guide, and then be assisted by a staff member to walk through the screening device. In some instances, the person is permitted to walk through with their dog guide. However as the dog guide harness sets off the alarms this then requires the person to have a body search, which is an invasion of privacy.

A person who is blind or has low vision often has adaptive technology equipment, such as portable computers with Braille displays, with which security staff may not be

familiar. Although it would be impossible to familiarise staff with every form of equipment available, there should be general awareness training on adaptive technology.

Vision Australia is also concerned by the technology to be introduced more commonly into security screening, such as biometrics, particularly retina scans. It is important to note that for a person who has damaged retinas such identification technologies will be ineffective.

Conclusion

Vision Australia hopes that our comments will be incorporated into the National Aviation Policy, to ensure fair and equitable air travel in Australia. Consistency of service and accountability under Australian discrimination legislation is essential to ensure this. We would be very pleased to discuss any of the above further.

Yours faithfully,

Sue Crane
Policy & Advocacy
Vision Australia