



Aviation Green Paper Towards 2050

*Department of Infrastructure,
Transport, Regional Development,
Communications and the Arts*

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SUBMISSION



AUSTRALIA

**RESEARCH
ADVOCACY
CURE**

Aviation Green Paper

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MS Australia is Australia's national multiple sclerosis (MS) not-for-profit organisation that empowers researchers to identify ways to treat, prevent and cure MS, seeks sustained and systemic policy change via advocacy, and acts as the national champion for Australia's community of people affected by MS.

MS Australia represents and collaborates with its state and territory MS Member Organisations, people with MS, their carers, families and friends and various national and international bodies to:

- Fund, coordinate, educate and advocate for MS research as part of the worldwide effort to solve MS
- Provide the latest evidence-based information and resources
- Help meet the needs of people affected by MS.

Multiple Sclerosis (MS) is the most acquired neurological disease in younger adults around the world with over 2.8 million people affected. More than 33,300 Australians live with MS and over 7.6 million Australians know someone or have a loved one with this potentially debilitating disease.

Symptoms vary between people and can come and go; they can include severe pain, walking difficulties, debilitating fatigue, partial blindness and thinking and memory problems. For some, MS is characterised by periods of relapse and remission, while for others it has a progressive pattern of disability. MS robs many people of quality of life, primarily driven by the impact of MS on pain, independent living, mental health, and relationships.

Aviation Green Paper

MS Australia welcomes the opportunity to make a submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts - Aviation Green Paper (Green Paper). MS Australia appreciates the sector consultation with the Green Paper and hopes that the Aviation White Paper will improve the accessibility of aviation travel for people with disability, including people living with MS.

This submission addresses the questions outlined in section **3.3 Disability Access** in the Green Paper.

MS Australia Recommendations

- Amending the Transport Standards to incorporate a dedicated Schedule outlining detailed provisions for air transport. This process should be co-designed by people with disability and their representatives in collaboration with air transport providers.
- Integrating transparent reporting and systematic data collection into the Transport Standards to assess compliance. Establish a publicly accessible and nationally consistent reporting framework for continuous monitoring, ensuring thorough adherence assessment, with the information being fully accessible to people with disabilities.
- The implementation of a model requiring airlines to publicly report when wheelchairs and mobility aids are damaged.
- Requiring states and territories to report on progress against their commitments to improving [whole-of-journey](#) accessibility, as part of mandatory reporting. At the state and territory levels, this necessitates coordinating and planning systems involving consultation among various government agencies, local governments, councils, transport operators, providers, and people with disabilities.
- Mandating that air travel service providers fulfill training and accessibility standards. These providers should proactively address all access barriers to their services, ensuring comprehensive training for their staff in effective communication and assistance provision for travellers with disabilities.
- Accessible information and communication be comprehensively covered under the Transport Standards.
- The development of a disability access team within airlines to advise staff on the ground on specialist issues regarding accessibility.
- A disability client services manager position at each airport to provide individual customer service and meet the needs of people with disability who are using air travel.
- Free short-term parking at all airports.

- Staff training that focuses on:
 - ❖ The Hidden Disabilities Sunflower to better understand people living with invisible disabilities and be able to support their accessibility needs.
 - ❖ Inclusion and diversity.
 - ❖ In person training opportunities with people with lived experience of disability
- That Disability Access Facilitation Plans should be compulsory for airlines and airports and that DAFPs must be created, implemented and reviewed in consultation with people with disability.
- Investigating the concept of an aviation sector Australian DAFP number for each person with a mobility impairment who uses aviation travel, the number would be used by all carriers and accessed via an online portal.
- Implementing rigorous and ongoing training programs for airline and airport staff to enhance their awareness, understanding, and responsiveness to the needs of passengers with disabilities. This training should cover communication, assistance, and the use of specialised equipment.
- Airlines should phase out the first-on-last-off practice for people with mobility impairment and move towards a model of individualised service for people with disability.
- All airlines should implement baggage tracking, at minimum for oversized and special baggage including mobility aids.
- Establishing a streamlined and accessible reporting mechanism for travellers to report issues related to accessibility. This could include a dedicated helpline, online portal, or mobile app, allowing for the reporting and collation of data to determine and respond to trends.
- A review of the AAF Terms of Reference and the following improvements:
 - ❖ Rephrased and more concise wording
 - ❖ A clearer definition of the membership (for example in an appendix) including how many members from each sector, how members are chosen and which representatives from departments attend. Under the current broad definition, the person with disability could be an airline employee, the member representing the disability sector, nor any other member is required to be a person with disability. The Terms of Reference must require at least one member who is an independent person with lived experience of air travel.
 - ❖ Outline how often the AAF will meet and how they are engaged with by departments, for example which representatives attend the meetings and how they feed back to the department more broadly.
 - ❖ Transparent guidance on what the AAF is intended to achieve including goals and timelines.

Introduction

Air travel poses formidable, ongoing obstacles to accessibility for people with disability, including people living with MS. Evidence provided to hearings of the Royal Commission into Violence, Abuse, Neglect, and Exploitation of People with Disability shed light on the disheartening reality that people with disabilities face negative experiences when navigating the skies. Air travel is a heavily regulated form of transport, with specific safety and security requirements that can create additional challenges for travellers living with disabilities. The ramifications of these challenges extend beyond the constraints of current legislation, regulatory frameworks and industry bodies.

MS Australia has consulted with the [Lived Experience Expert Panel](#) (LEEP), a diverse group of people across Australia who either live with MS or are a carer for someone living with MS, to ensure that lived experience formed the basis for this submission. Members of the LEEP provided extensive feedback on aspects of aviation travel that cause angst for people with disability and personal experiences of inconvenience, discrimination and distress. The aspects of aviation travel that are accessible and lead to a positive experience for travellers with disability have also been highlighted.

People living with MS can experience a wide range of symptoms and disability, some use a wheelchair or mobility aid and others live with an invisible disability as their symptoms are not obvious to others. The feedback from the LEEP members covers the diverse range of experiences of disability for people living with MS. Based on member responses it appears that while there is a long way to go still in achieving accessibility, positive experiences with aviation travel are increasing for people with MS. For example, one LEEP member who has already flown 21 times in 2023 indicated that of these 21 trips, only 3 were negative experiences. Whereas 5 years ago 50% of her flights were negative experiences as a person living with MS.

3.3 Disability access

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

Specific standards for air transport

MS Australia's position is that the Disability Standards for Accessible Public Transport (Transport Standards) should cover all forms of public transport including air travel services. To rectify the shortcomings in legislation and effectively tackle the distinct challenges associated with air travel and specific accessibility requirements, it is important to introduce enforceable minimum standards for air transport operators and providers. The absence of effective oversight and enforcement mechanisms has led to the inconsistent application of accessibility standards within the airline and airport domains. This lack of uniformity in air travel services curtails choices for consumers and does not meet human rights obligations.

The most direct approach to achieving this is amending the Transport Standards to incorporate a dedicated Schedule outlining detailed provisions for air transport, accompanied by the implementation of effective monitoring and enforcement mechanisms. Furthermore, we recommend that airlines and people with disability co-design a process that will be beneficial for all. The process needs to be transparent with decisions made publicly available.

Air travel involves various components, such as ticket booking, check-in, mobility aid transitions, security screening, terminal navigation, boarding, and disembarking, each posing potential challenges for people with disabilities. Unfortunately, the Transport Standards inadequately consider and confront these diverse elements of air travel, failing to accommodate the complexity experienced by travellers with disabilities.

Notably, the Transport Standards do not ensure the accessibility of airline ticket booking processes

for people with disabilities, establish minimum assistance standards within airports and during aircraft transitions, or delineate circumstances under which refusing air travel to individuals with disabilities would be deemed unlawful. The omission of these specific features renders the Transport Standards ineffective in eliminating discrimination and renders them unfit for the unique demands of air transport.

Accessible information and communication

MS Australia's position is that accessible information and communication must be comprehensively covered under the Transport Standards. This aligns with [Australia's Disability Strategy 2021-2031](#) Policy Priority 6 of the Inclusive Homes and Communities Outcome Area¹ to ensure information and communication systems are accessible, reliable and responsive.

Transport Standards: Mobility aids

A model where public reporting by airlines of damage done to wheelchairs and mobility aids is one that MS Australia strongly encourages.

Mobility aids are addressed further under Disability Access Facilitation Plans in this submission.

Transport Standards: Part 7 Waiting areas and Part 8 Boarding

Fatigue and dizziness are common symptoms of MS. Having to stand and progress through long queues in an airport can be very difficult for people living with MS. Designated and accessible chairs at the front of the bag drop, security processing, flight boarding and ground transport queues for people with a disability to sit while waiting would significantly alleviate the need to stand in the queue for a long period of time. While some travellers with disability may not feel comfortable using such seats this initiative would greatly benefit those who would feel comfortable, or through necessity need to use the seats.

Transport Standards: Part 15 Toilets

Airline guidelines require people who use mobility aids to board 2 hours prior to departure, making it difficult for people living with MS who experience incontinence. Bladder and bowel issues are a common symptom of MS, for some people this may be short-term during a relapse, and for others the problem can be long-term. People with MS report that once they are seated on the plane, they are not allowed to move until the flight is full or until after take-off. This can be very distressing for people due to the sensitivities around incontinence issues. Even on planes that have wheelchair accessible toilets, the toilets are too small and don't allow for a carer to easily assist.

MS Australia recommends:

- Amending the Transport Standards to incorporate a dedicated Schedule outlining detailed provisions for air transport. This process should be co-designed by people with disability and their representatives in collaboration with air transport providers.
- Integrating transparent reporting and systematic data collection into the Transport Standards to assess compliance. Establish a publicly accessible and nationally consistent reporting framework for continuous monitoring, ensuring thorough adherence assessment, with the information being fully accessible to people with disabilities.
- The implementation of a model requiring airlines to publicly report when wheelchairs and mobility aids are damaged.
- Requiring states and territories to report on progress against their commitments to improving [whole-of-journey](#) accessibility, as part of mandatory reporting. At the state and territory levels, this necessitates coordinating and planning systems involving consultation among various government agencies, local governments, councils, transport operators, providers, and people with disabilities.

- Mandating that air travel service providers fulfill training and accessibility standards. These providers should proactively address all access barriers to their services, ensuring comprehensive training for their staff in effective communication and assistance provision for travellers with disabilities.
- Accessible information and communication be comprehensively covered under the Transport Standards.

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

Trained disability access team

This initiative envisions positioning Australia as a global best practice example in disability-friendly air travel, with the potential to serve as a benchmark for international standards. MS Australia advocates for the creation of a specialised disability access team within airlines. The team would be meticulously trained to consult with staff when necessary, acknowledging that staff on the ground at airports cannot feasibly be trained in all aspects of disability. This disability information service would employ a team of people with disability lived experience and would provide guidance for airline staff at all levels on issues such as mobility aids, medical baggage, incontinence and help staff navigate airport and airline regulations and the needs of people with disabilities who are travelling.

Furthermore, MS Australia emphasises the importance of dedicated and trained staff both within airport facilities and aboard airplanes. Clear and transparent communication channels to the public regarding the roles of these staff and the available assistance options are crucial components of an inclusive air travel environment. Additionally mandatory training programs for all aviation industry staff are required to improve their understanding of the diversity of disability lived experience, and to create an impetus for ongoing improvements in the accessibility experiences for people with disability.

An example of an organisation providing staff disability inclusion training is an initiative undertaken by the University of Queensland (UQ) in collaboration with the Australian Network on Disability (AND). The partnership developed a [disability inclusion course](#) for staff to foster awareness of various disabilities and increase inclusive practice. In addition to the training the university supports a Disability Inclusion Advocacy Network, of which staff can become members. One of the aims of the network is to enhance understanding and recognition of hidden disabilities, promote a broad awareness of the many types of disability and the social model of disability. Members can wear a lanyard and badge to help make visible their status as a disability inclusion advocate.

MS Australia strongly believes that if airline and airport staff are trained and informed, they can promote a strong ethos of diversity and inclusion and minimise the risk of disconnect between good intentions and lived experiences of air travel.

Disability client services manager

Feedback from MS Australia's LEEP members highlighted the need for more personalised service for people travelling with disabilities. MS Australia advocates for the exploration of the concept of a disability client services manager stationed at each airport. For example, when you book your flight with an airline instead of the current tick box for disability or mobility aid, there could be a text box for people to include information about their specific requirements. The disability client services manager would engage directly with travellers with disabilities in advance via phone or email, to discuss their needs. The staff member would subsequently contact the airline who would implement a disability traveller action plan that will be specific to the travellers needs and what they require to comfortably travel. This process could be overseen by airline staff who also manage the procedures involving unaccompanied minors travelling.

Hidden disabilities sunflower lanyard

For many people with MS, their symptoms are hidden, and they live with an invisible disability. This can pose nuanced challenges during air travel. The introduction of the [Hidden Disabilities Sunflower lanyard](#) is a positive step. As the sunflower lanyard gains traction both domestically and

internationally, more travellers are likely to be wearing them so mandatory training among airport and airline staff on the significance of the lanyard is needed. This training would enable staff to engage effectively with travellers about their requirements, thereby significantly improving the travel experience for individuals with invisible disabilities.

Case Study – Brigitte

Brigitte travelled in October using the sunflower lanyard for the first time. The airport had a specific security gate for people travelling with the sunflower lanyard on display. However, there were no further accessibility measures or accommodations offered and Brigitte still experienced accessibility issues. Brigitte's impression was that airlines and airports are just doing a token acceptance of the sunflower lanyard, but it is not leading to personalised service that meets the specific needs of people with disability.

Parking at airports

The significant cost of parking at airports poses a financial burden for carers who cannot just drop a person with care needs off in a drop off zone. Carers may need to park a car to help the person get out their wheelchair, mobility aid or luggage and get into the terminal.

MS Australia advocates for free short-term parking at all airports. This recommendation seeks to alleviate the financial strain imposed by exorbitant parking fees. One member of MS Australia's LEEP recalled that a carer recently paid \$50 in parking fees while assisting her with drop off and accessing the terminal.

MS Australia recommends:

- The development of a disability access team within airlines to advise staff on the ground on specialist issues regarding accessibility.
- A disability client services manager position at each airport to provide individual customer service and meet the needs of people with disability who are using air travel.
- Free short-term parking at all airports.

MS Australia recommends staff training that focuses on:

- The [Hidden Disabilities Sunflower](#) to better understand people living with invisible disabilities and be able to support their accessibility needs.
- Inclusion and diversity.
- In person training opportunities with people with lived experience of disability.

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

Travelling by air for people with disabilities in regional and remote areas presents a unique set of challenges compared to more urban settings. Members of MS Australia's LEEP who live in or travel to regional and remote areas provided feedback on some specific challenges including:

1. Inadequate facilities for embarking/diseMBarking:

- ❖ At regional airports, airbridges are not always available to facilitate embarking and disembarking an aircraft, so using external stairs down from the terminal and up to the aircraft is often required. This presents a major challenge when a passenger is

using a mobility aid, however it also presents significant challenges to a passenger with an invisible disability. For example, a person living with MS who experiences symptoms such as balance issues, heat sensitivity or fatigue.

2. *Reduced availability of services:*

- ❖ Smaller airports in remote areas may have fewer support services, such as accessible transportation within the airport, assistance for boarding and disembarking, and accessible amenities.

3. *Flight availability and options:*

- ❖ Limited options for the timing of flights, they are either very early in the morning which can be a problem for people with a disability in preparing to leave home at early times or late at night when there is less likely to be assistance available in the airport.

4. *Lack of trained staff:*

- ❖ Regional airports are likely to have fewer staff resources, especially during quiet periods.
- ❖ Staff at regional and remote airports may have limited training or experience in assisting travellers with disabilities. This can lead to potential challenges in communication, boarding, and providing necessary support and the lack of awareness can make it harder for staff to support for people with hidden disabilities.

Case Study – Kate

Kate is a 35-year-old woman living with Multiple Sclerosis (MS), who lives in Queensland. One of the challenges Kate has encountered while travelling through regional airports is the lack of appropriately trained staff. At a time when Kate was using an injectable Disease Modifying Therapy (DMT) as part of her treatment she encountered issues related to ground staff training and regulations regarding medical sharps. Despite holding a medical certificate explaining her condition and medication, her sharps bin was confiscated at airport security. Kate was travelling with carry-on luggage only, leaving her with no choice but to put used needle cartridges in her carry-on suitcase. This caused complications at her destination when she needed her next injection. Her partner had to visit multiple local chemists to find a replacement sharps bin.

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

Enhancing Disability Access Facilitation Plans (DAFPs) by airlines and airports in Australia requires a comprehensive approach to address various aspects of accessibility. DAFPs should be compulsory for all airlines and airports. The plans must clearly outline how airlines and airports will work together to decide who is responsible for supporting people with disability during each part of their air travel journey. For example, if baggage handlers are contracted out to a different business, the service provider must still be responsible for the behaviour and actions of the baggage handlers.

MS Australia proposes an alternate initiative to address the challenges of mandating DAFPs for airlines and airports that are reviewed annually. The aviation sector could provide all people travelling with a disability with an Australian DAFP number that is used by all carriers and accessed via an online portal. This would eliminate the need to complete forms annually for each and every carrier, and the person would be able to update their information as needed in one central point. This would potentially reduce the need for the 'sighting at the counter' requirement and allow people to travel with the dignity, access and convenience that people without disabilities are afforded. The range and experience of disability is so diverse the information required could all be achieved through forms

submitted prior to travel on the portal. This number could also be used when issues arise, taking away the need for a case number.

Feedback received by members of MS Australia's LEEP who have used air travel in Australia recently informed the following areas for improvement:

Comprehensive staff training

Feedback from members of MS Australia's LEEP highlights that a lack of trained staff who know how to support people with disabilities is the biggest barrier they face when flying. MS Australia supports implementing rigorous and ongoing training programs for airline and airport staff, including ground crew and baggage handlers, to enhance their awareness, understanding, and responsiveness to the needs of passengers with disabilities. This training should cover communication, assistance, and the use of specialised equipment. Trained and understanding staff are better able to identify when people with a disability may need extra help or privacy when accessing airports, airplanes or moving through security. DAFPS must include detailed information about how staff will be trained in disability inclusion.

Inclusive consultation

It should be a requirement of airlines and airports that DAFPs are created, implemented and reviewed in consultation with people with disability and disability advocacy groups. Their insights will provide valuable perspectives and understanding of the travel experiences of people with disability and ensure the plans meet diverse needs. It is important to note that people with disability can have a wide variety of different symptoms and there is not a one stop approach that will make travel for all people with a disability easier. As such it is vitally important that consultation is broad and inclusive of the diversity of lived experience.

Consultation should also include other airlines to ensure consistency across carriers. Additionally, any quality assurance or auditing should include the DAFP in part of the process.

Direct Assistance

Direct assistance is not guaranteed by all Australian DAFPs. For some of the regional airports, such as Newcastle airport the DAFP is very brief. The Jetstar DAFP outlines a number of ways that it will assist people with disability, however this is subject to staff availability. Jetstar states in the DAFP that as a low-cost airline it does not provide the same level service as other airlines. It is not acceptable that airlines are able to opt out of providing accessible air travel due to being a budget carrier. There are many reasons why people with disability would need to fly with a budget carrier, including financial pressures and some destinations only have one carrier servicing the airport.

One member of MS Australia's LEEP provided feedback that this year she had flown business class more than previously and had noticed a considerable difference in service. She reported "I have found I receive much better service and willingness to help/accommodate for my disability than when I fly economy. Unfortunate that you have to pay more for airlines to be willing to help people with disabilities."

Arriving at the terminal and check-in

- People living with MS, especially if unaccompanied, may need assistance to get from the entrance of the terminal to the check-in desk and to orient themselves within the terminal. According to most airport DAFPs assistance into the terminal may be provided depending on staff availability, however wheelchairs are not permitted to be used in some areas, including airport carparks.
- A reception point or seating area is needed at the main or a designated entrance to the terminal. This is not standard practice despite it being such a simple inclusion to improve accessibility.

- People with mobility impairment need face to face assistance to check-in and check bags. Automated check-in consoles do not meet their needs practically or ergonomically. It can be difficult to find staff to assist.
- Long queues at check-in can be challenging for people with disability for many reasons. Best practice is to have a separate dedicated lane for people with mobility aids and not group them with people with families and children in prams.
- People with disability should be informed clearly at check-in of what arrangements will be made to ensure they make it safely to their flight and how this will happen. Too often people are parked in the 'people with mobility impairment' assembly area with no information, and no means of contacting someone if something goes wrong.

Security screening

- There is no set protocol and usually no questions are asked as to whether the person would like to walk, stand, or be patted down in the wheelchair or using the mobility aid.
- The security screening gateway should provide wooden canes for use by ambulant travellers to allow them to put their walking aids through the screening machine and walk the few steps through the security device. Otherwise, they are required to remain in wheelchair and be patted down which is slow and personally intrusive.
- Airports regularly have long queues at security. There is an express security line for pilots and flight attendants so they can clear customs and security quickly. Perhaps travellers with a disability should also be able to use these express lines so they can get through long queues quickly.

Case Study – Jordan

Jordan is a teenager who uses a wheelchair and he recently travelled domestically with his Mum Emma, who is also his carer. Jordan was going through the security scanners and wanted to stand and walk through whilst Emma held onto the wheelchair. Jordan was told to “get back in your pram” by security staff. Emma tried to explain that Jordan was able to walk certain distances, and that he wanted to walk through rather than being patted down in the wheelchair. The staff member then in a loud voice instructed Jordan again to “get back in your pram.” This was done in full view of all other travellers and was a distressing experience for Jordan and Emma. The staff member clearly had no understanding of mobility or of how to engage with or support a person with disability.

Access to and on-board an aircraft

Many airlines require people using mobility aids to embark ahead of all other travellers and to disembark after all other travellers have cleared the aircraft, regardless of class of travel. Qatar Airways is a notable exception. Qatar Airways accords respect and equal priority to all travellers. While the reasons for this practice can be understood, the practice is discriminatory. Cabin crew are frequently impatient and impolite with people using mobility aids and one member of the LEEP reports being instructed to “get out of the way” of able-bodied travellers.

The first-on-last-off practice means:

- The most vulnerable travellers are retained in the aircraft for the longest amount of time and also at the time when temperature control, air circulation and air purification is poorest and passenger crowding, and movement is at its peak.
- Time in the aircraft is far longer than for the average traveller giving people less time in transit lounges on longer itineraries and hence less time for rest and toilet breaks when this is already complicated by accessibility issues.

- When the transit mobility assistance is inefficient, slow and chaotic, as is often the case, then the person often has no respite at all despite having a 3- or 4-hour stopover. It can take that long to get from one aircraft to the connecting aircraft.
- Airlines often don't differentiate between people who have greater or lesser mobility assistance needs. This means ambulant people with disability may be forced to wait up to an hour at both embarkation and debarkation for an external lift platform when simple wheelchair assistance or buggy assistance would have sufficed.
- Being required to attend the departure gate 2 hours prior is inconvenient and can cause difficulties for people with symptoms such as incontinence, fatigue and pain.

A member of the LEEP reported that on one trip this year in Australia, she waited over an hour on the plane as they did not have any staff members available to help with special assistance and bring her day chair to the gate or get a buggy or wheelchair for her. The pilot of the plane ended up taking the time to push her in an aisle chair to baggage claim where the day chair was sitting.

Case Study – Vanessa

Vanessa lives with MS and has had positive experiences with the check-in process, with supportive staff taking note of her special assistance needs. However, because Vanessa's disability is invisible, and she can walk onto the plane the cabin crew dismiss her notes and do not provide assistance. Many times, Vanessa has been forgotten about and a wheelchair has not been available at the arrival gate due to cabin crew cancelling the special assistance request. It is very tiring for Vanessa to go through the entire process of explaining special assistance and mobility needs to multiple staff members.

Carriage of Mobility Aids and Medical Equipment

MS Australia sees the key issue regarding accessibility as the separation of people who use a mobility aid from their wheelchair or mobility aid. Wheelchair accessibility is the second most difficult aspect of travelling with a disability, as reported by members of MS Australia's LEEP.

Feedback from LEEP members highlights the issues experienced by people who use mobility aids:

- Damage to wheelchairs is the most commonly reported and most impactful issue.
 - ❖ One person reported having had two wheelchairs written off by an airline.
 - ❖ Another person had their mobility scooter broken whilst being loaded or unloaded from a domestic flight. The airline repaired it and provided a replacement in the interim, but the replacement was much bigger and clumsier than the one he was travelling with, and the experience was very inconvenient.
- If a traveller is checking mobility equipment as checked baggage, standard current practice is that they or their carer must take the item to the special or oversized baggage counter themselves, which is often located at a remote part of the terminal. This should not be the case, especially if the traveller is unaccompanied.
- Wheelchair batteries - not all staff understand policy and regulations around batteries. People living with MS report circumstances whereby staff insist on taking the battery off the chair and in one instance refusing to let someone travel on the plane due to the excess weight of the battery.
- Staff attempt to disassemble wheelchairs for the flights but have difficulty due to lack of training.
- There are restrictions on where airport and airline wheelchairs and passenger transport carts can be used. This is difficult when transiting between flights with different airlines.

- Complications arising from bookings, for example requiring people to book wheelchair assistance over the phone rather than online. If there is an issue with wheelchair assistance paperwork people must call and provide a case number. This service is not always timely and people with MS report flights leaving prior to receiving a reply to their case.
- At some airports wheelchairs are managed by an airport contractor who is not linked to the airlines. People with MS report having to wait for considerable time for a wheelchair when embarking or disembarking from the plane.
 - ❖ One person recounted a stressful experience where he had handed in his mobility scooter in preparation for boarding. He then waited multiple hours for a wheelchair and the flight called last boarding as he was being rushed on board.
 - ❖ Another person recalled exiting a flight recently and finding that their wheelchair was not there. The cabin crew couldn't find the chair, it wasn't found for five days and the person, who is a carer for her son who uses a wheelchair, was told to walk to the service desk to formalise the process. The service desk was a long distance away and her son was unable to walk there.
- The process for collection of wheelchairs at baggage claim varies wildly from day to day regardless of airline.

Case Study – Janine

Janine is an athlete who lives with MS and uses a wheelchair.

Janine regularly travels on commercial airlines by herself to attend interstate sporting competitions and events. Janine does not take her day wheelchair with her as she already has a large amount of baggage including a sports chair in a travel bag, wheel bag and suitcase. It is too difficult for Janine to independently travel with the extra sports chair when she has her day wheelchair, so she must manage without it. If Janine is travelling with a team, she can then take her day wheelchair with her. Many athletes in her situation will have someone travel with them for this reason.

Often Janine's sport wheelchair will go to oversized baggage claim, but the wheel usually goes to a different collection point, even though the items are always checked together as oversized baggage. To overcome this issue, she now travels with an Apple AirTag on all her wheelchair items to track them.

Virgin Australia has implemented a bag tracking system to overcome this baggage issue. Travellers receive a text as their baggage comes out letting them know which collection point their items are located at. Janine finds this to be a helpful process and would like to see all airlines implementing a similar system.

Transit arrangements and changing terminals and/ or flights

MS Australia would like to see airport mobility assistance move forward to an experience where people with disability can negotiate the entire transit without having to move from one mobility assistance modality to another. For example, there could be lifts and transfer arrangements which accommodate passenger travel carts (buggies), which is the preferred form of transport within an airport as it is less labour intensive and faster than manually pushed wheelchairs. In airports where a change of floor level or change of terminal is required, best practice is for a buggy to take the passenger as far as possible then transfer the passenger to wheelchair assistance and then transfer the passenger back to the buggy once the change of level or mode is negotiated. Feedback from MS Australia LEEP members highlights again that Qatar Airways maintain best practice at their DOHA Terminal.

Feedback from people living with MS highlights the difficulties when airbridges are not available and stairs or an external lift are required to access the aircraft and the terminal. Transit from domestic to international terminals and vice versa involves long distances and requires travellers to embark and disembark buses and traverse all weather conditions. Wheelchair assistance is frequently late or fails to turn up altogether. Sydney airport is one of the most challenging airports for people with mobility impairment as several aircraft and departure gates are not served by airbridges and/or lifts.

Communications

- People who use mobility aids are required to complete a large quantity of paperwork every year to travel on airlines. Each airline has its own forms to complete, so people with MS report using the same carrier to simplify life. Making bookings over the telephone is an antiquated system and the information being provided is minimal, causing the time-consuming sighting at the desk process at the airport.
- People with MS strongly oppose the process of airlines needing to visually site each person with mobility impairment at the desk. This process can be humiliating, time-consuming and often results in the traveller having to educate the staff about accessibility. The process of visually sighting people using mobility aids is then repeated on connecting flights, and various carriers.
- If detailed information about wheelchairs, batteries and mobility needs was collected through an online portal or online forms prior to departure then the visual sighting process would be unnecessary and perhaps not every person would then be required to go to the gate 2 hours prior to departure.
- People with MS report that communication is non-existent at the airport and the traveller has to place blind faith in airline and airport staff knowing where the traveller is, what their needs are and meeting the necessary deadlines for flights.

MS Australia recommends:

- That Disability Access Facilitation Plans should be compulsory for airlines and airports and that DAFPs must be created, implemented and reviewed in consultation with people with disability.
- Investigating the concept of an aviation sector Australian DAFP number for each person with a mobility impairment who uses aviation travel, the number would be used by all carriers and accessed via an online portal.
- Implementing rigorous and ongoing training programs for airline and airport staff to enhance their awareness, understanding, and responsiveness to the needs of passengers with disabilities. This training should cover communication, assistance, and the use of specialised equipment.
- Airlines should phase out the first-on-last-off practice for people with mobility impairment and move towards a model of individualised service for people with disability.
- All airlines should implement baggage tracking, at minimum for oversized and special baggage including mobility aids.

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?

Restructuring the Aviation Access Forum (AAF) to enhance effectiveness and drive impactful change for travellers living with disabilities involves several key considerations:

1. *Diverse representation:*

- ❖ There is an opportunity to renew the membership of the AAF to ensure that the diversity of the disability community is represented. People with disabilities must be in advisory positions and be well resourced so that they are able to meaningfully contribute to the AAF.

2. *Streamlined reporting mechanisms:*

- ❖ Work is needed to achieve the stated, but as yet unachieved, aim in the Terms of Reference of “receiving or collecting information about significant or systemic issues experienced by the disability community in accessing aviation services.”² MS Australia recommends establishing a streamlined and accessible reporting mechanism for travellers to report issues related to accessibility. This could include a dedicated helpline, online portal, or mobile app, allowing for real-time reporting and the collation of data to determine and respond to trends.

3. *Collaboration with industry partners:*

- ❖ There is uncertainty around the collaborative relationship between Australian Government agencies and the other AAF members. It is vital that Department representatives not only attend meetings and engage with the accessibility issues but also provide transparent feedback to the relevant Departments. Reporting back from the Departments needs to occur at each meeting to close the feedback loop. From the perspective of MS Australia, it appears that advice is not being taken.
- ❖ Airlines and the Australian Government could have a specific time frame around when the proposed changes or improvements be trialled or implemented. If not implemented, give feedback to the group as to reasons why and possible changes which would see the implementation of the suggestions raised by people with a disability.

4. *Consultation with the disability community:*

- ❖ According to the Terms of Reference the AAF is required to provide information to the disability community about aviation industry disability initiatives. MS Australia does not believe that this communication is effective.
- ❖ More information must be directed to disability service providers, not just peak bodies, who can be educated and informed about the support there is, to then help people with disabilities get the right information to be able to utilise this service.
- ❖ Feedback from members of MS Australia’s LEEP outlined that the guidance for airlines and for travellers provided by the AAF is insufficient and that the AAF is a “toothless tiger” that is unable to facilitate improved access to aviation travel for people with disability.
- ❖ The Aviation Access Forum should be structured so that people who have travelled recently are able to provide feedback on how their travel experience went, similar to a customer review. Recent travellers with a disability should be contacted and asked to provide any ideas on what could make their travel experience more comfortable in the future.

MS Australia recommends establishing a streamlined and accessible reporting mechanism for travellers to report issues related to accessibility. This could include a dedicated helpline, online portal, or mobile app, allowing for the reporting and collation of data to determine and respond to trends.

MS Australia recommends a review of the AAF Terms of Reference and the following improvements:

- Rephrased and more concise wording
- A clearer definition of the membership (for example in an appendix) including how many members from each sector, how members are chosen and which representatives from departments attend. Under the current broad definition, the person with disability could be an airline employee, the member representing the disability sector, nor any other member is required to be a person with disability. The Terms of Reference must require at least one member who is an independent person with lived experience of air travel.
- Outline how often the AAF will meet and how they are engaged with by departments, for example which representatives attend the meetings and how they feed back to the department more broadly.
- Transparent guidance on what the AAF is intended to achieve including goals and timelines.

References

¹ Department of Social Services (2021). *Australia's Disability Strategy 2021–2031*. Retrieved from: <https://www.disabilitygateway.gov.au/ads/strategy>

² Aviation Access Forum, Terms of Reference. Retrieved from: <https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-access-forum-aaf/terms-reference>



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