



Australian Government

Department of Infrastructure and Regional Development

Disability Access Facilitation Plans

Guidance to assist the preparation and review of a
Disability Access Facilitation Plan

For airports and airlines

December 2015

Purpose of the Disability Access Facilitation Plan Initiative

The Australian Government believes that constructive and pro-active engagement between operators, consumers and regulators, combined with the provision of clear and transparent consumer information, is the best approach to generating tangible improvements in access to air transport for passengers with disabilities.

This approach underpins the development of Disability Access Facilitation Plans (DAFPs).

The DAFPs are intended as a communication tool between airline and airport operators and the travelling public on the availability and accessibility of services for passengers with disability—covering the total travel experience from making a reservation through to arriving at the intended destination.

Airline and airport operators should consult with disability advocacy organisations, the Australian Human Rights Commission (AHRC), the Civil Aviation Safety Authority (CASA) and other relevant service providers in the preparation of the DAFPs.

Following consultation, operators are encouraged to publish their finalised DAFP online. The Department of Infrastructure and Regional Development (the Department) will maintain a webpage providing links to each online publication. This will provide consumers with an ability to consult all available DAFPs through one portal.

These Guidelines are provided to assist operators in preparing, implementing and reviewing their DAFPs and are divided into five sections:

Section 1: Operation of the DAFP Initiative

- How does the DAFP Initiative work? What are the steps in the process?

Section 2: Regulatory Framework

- What are the regulatory requirements that apply to disability access to aviation?

Section 3: Guidance for the preparation of the DAFP

- What should the operator consider when preparing a DAFP?

Section 4: Implementing and Reviewing the DAFP

- How is the DAFP implemented?
- What are the considerations that should be taken into account when reviewing the DAFP?

Section 5: Contact details for interested stakeholders

- Who can be contacted for further information or assistance?

Section 1: Operation of the Disability Access Facilitation Plan Initiative

Participating in the DAFP Initiative

Operators are encouraged to prepare and publish a DAFP to provide passengers with disability, carers and other parties, clear and easily accessible advice on how disability access is managed within their respective operations. These operations include:

Airlines

- All airlines operating regular public transport services in Australia, including non-Australian international carriers operating to and from Australia.
- An airline group has the option to prepare an individual DAFP for each airline or one DAFP covering all airlines within the group. However, a DAFP covering all airlines should detail any instance of variation in access arrangements between different airline operations.

Airports

- All airports from which regular public transport services operate.
- Operators who use contractors to perform particular services or facilities within their operations (e.g. security screening and ground-handling services) should outline steps taken to facilitate disability access within these functions.

Preparing the DAFP

There is no particular format for a DAFP. Operators can choose a format that they believe best communicates information about the available services and facilities for people with a disability.

However, operators are encouraged to access the DAFP templates on the Department's website at <https://infrastructure.gov.au/aviation/aaf/disability.aspx>, for an indication about the kinds of information that should be included in DAFPs and may wish to adopt the format used in the template for their DAFP.

Note: Section 3 provides further information on the use of the DAFP templates and the development and review of DAFP for operators.

Consultation

Operators should consult with disability advocacy organisations and their local community to obtain feedback and views on their approach as well as to ensure that the language and content is accessible, easy to understand and useful.

After the operator has consulted and developed their DAFP, they may wish to provide it to the Department and CASA for review comment. This is simply another way to potentially improve the content of the DAFP rather than being a formal approval or endorsement process.

Publishing, Implementing and Reviewing the DAFP

Airline and airport operators should publish their DAFPs online in a clear, identifiable location and ensure that it is in an accessible format such as the W3C recommended Web Content Accessibility Guidelines Version 2.0 (WCAG 2.0). This will allow passengers to easily locate and use the DAFP in planning their air travel.

In addition to online publication, and where resources allow, operators are encouraged to have DAFPs available in alternative formats for the benefit of passengers who do not have internet access, or may require versions in alternative formats. Operators may also choose to provide a resource available at airport counters that summarises the services and facilities available for passengers with disability within an airport or airline operation.

Operators should update their DAFP regularly to maintain its currency and to reflect changes and improvements to services and facilities. This will further assist those passengers with disabilities to be better informed and remain up-to-date in their understanding of services offered.

The Department will maintain a list of DAFPs provided by various airline and airport operators. It is encouraged that operators refer passengers to the Department's website for further information on the DAFP initiative at <<https://infrastructure.gov.au/aviation/aaf/disability.aspx>>.

Section 2: Regulatory Frameworks

This section provides information on the regulatory provisions which are relevant to the preparation of a DAFP, particularly those relating to aviation safety and disability discrimination. Applicable international standards are also identified.

CASA regulates the safety of the aviation industry in Australia. It administers the *Civil Aviation Act 1988*, the *Civil Aviation Safety Regulations 1998*, the *Civil Aviation Regulations 1988* as well as numerous pieces of delegated legislation to ensure the aviation industry in Australia is safe and compliant with international safety standards.

A number of elements of this regulatory framework relate to the facilitation of passengers with disabilities in the aviation environment. To ensure compliance with those provisions, airlines and airports should continue their liaison with CASA.

International Context

The Australian Government affirmed its commitment to the equal treatment of people with disabilities by ratifying the United Nations' *Convention on the Rights of Persons with Disabilities* in July 2008.

Australia is also a member of the International Civil Aviation Organization (ICAO), which maintains a set of Standards and Recommended Practices in relation to the facilitation of the transport of passengers requiring assistance related to disability. They can be found in Chapters 6 and 8 of Annex 9 to the *Convention on International Civil Aviation*. ICAO's Manual on Access to Air Transport by Persons with Disabilities contains guidance material for their implementation. The Department can assist with access to ICAO guidance materials.

ICAO defines a person with a disability as:

Any person whose mobility is reduced due to a physical incapacity (sensory or locomotor), an intellectual deficiency, age, illness or any other cause of disability when using transport, and whose situation needs special attention and the adaptation to the person's needs of the services made available to all passengers.

Disability Discrimination

Below is a brief survey of applicable disability discrimination law and guidance, which will assist in the preparation of a DAFP.

Note – this information does not constitute legal advice and is presented for reference only.

The *Disability Discrimination Act 1992* (DDA) is the Commonwealth legislation which aims to eliminate discrimination against people with disabilities, including in the provision of services such as public transportation and access to premises.

Disability is defined under section 4 of the DDA and includes physical, sensory, intellectual and psychiatric disability. Specifically, the definition is as follows:

disability, in relation to a person, means:

- (a) total or partial loss of the person's bodily or mental functions; or
- (b) total or partial loss of a part of the body; or
- (c) the presence in the body of organisms causing disease or illness; or
- (d) the presence in the body of organisms capable of causing disease or illness; or
- (e) the malfunction, malformation or disfigurement of a part of the person's body; or
- (f) a disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction; or
- (g) a disorder, illness or disease that affects a person's thought processes, perception of reality, emotions or judgment or that results in disturbed behaviour;

and includes a disability that:

- (h) presently exists; or
- (i) previously existed but no longer exists; or
- (j) may exist in the future (including because of a genetic predisposition to that disability); or
- (k) is imputed to a person.

*To avoid doubt, a **disability** that is otherwise covered by this definition includes behaviour that is a symptom or manifestation of the disability.*


When considering disability access matters, operators are encouraged to also consider other passengers who may require assistance in their journey, including carers, children and older passengers. There are potentially a broad range of people who benefit from improved access arrangements. Taking a broader perspective will ensure the maximum value and benefit is extracted from access improvements and help to achieve better overall passenger facilitation outcomes, whether the operation is an airport or an airline.

The DDA also defines discrimination. Discrimination is defined to include:

- direct and indirect discrimination;
- discrimination to relatives and associates, such as carers;
- discrimination on the basis of the possession of disability aids such as wheelchairs, canes or hearing aids; and
- discrimination on the basis that a person needs assistance from other people or, in some cases, animals (e.g. assistance animals).

The DDA allows disability standards to be formulated in a range of areas. The purpose of disability standards is to spell out in greater detail rights and obligations under the DDA, providing greater certainty about the Act's requirements. There are two types of disability standards that are applicable to the aviation sector.

The Disability Standards for Accessible Public Transport 2002 (Transport Standards) aim to provide greater certainty and clarity around these obligations for public transport operators, and apply to both airlines and airports. The Transport Standards have legal effect and a failure to comply with them can be the subject of a complaint of unlawful discrimination under the DDA.



Airport operators should also be aware of the requirements of the Disability (Access to Premises - Buildings) Standards 2010 (Premises Standards) which aim to provide people with disability with dignified and equitable access to buildings. The Premises Standards also have legal effect and a failure to comply with them can be the subject of a complaint of unlawful discrimination under the DDA.

The DDA and accompanying legislation recognises that it may not be possible for airline and airport operators to fully accommodate the needs of travellers with disability in every circumstance and makes appropriate provisions for this in certain situations. It is envisaged that over time, as infrastructure is improved or redesigned and technology improves, operators will ensure that their practices and infrastructure are aligned with the DDA.

More information on the DDA is available through the Commonwealth Attorney-General's Department at <<http://www.ag.gov.au/RightsAndProtections/HumanRights/Pages/default.aspx>>

Section 3: Guidance for the preparation of the DAFP

The Department provides templates for airline and airport operators to assist with the preparation of a DAFP. Operators are encouraged to use the relevant template and to tailor it to suit the individual circumstances of their operations. These templates are available at <https://infrastructure.gov.au/aviation/aaf/disability.aspx>.

Important notes on the templates

- The purpose of the templates is to assist operators to develop and review a DAFP.
- The templates are structured to relate to each stage of the passenger's journey. Operators are encouraged to advise passengers with disabilities what assistance is available at each stage of the journey and how it can be accessed.
- Operators should tailor the information in the DAFP to suit their operations.
 - DAFPs should be more than just general statements of policy alone and provide practical information.
 - It is not expected that operators will respond to every question in the template or that the DAFP be presented in a 'question and answer' format.
 - Some content in the templates have been included based on difficulties commonly experienced by passenger with disabilities and so should provide a guide for operators on the kinds of access arrangements that might be needed.
- The templates use inclusive language and acceptable terminology that should not cause offence - such as 'people with disabilities' rather than 'disabled people'. Operators should use acceptable terminology their DAFP and in general communications. Information on acceptable terminology is available on the People with Disability website (pwd.org.au) the current link being: <https://pwd.org.au/wp-content/uploads/2021/12/PWDA-Language-Guide-v2-2021.pdf>
- The template is flexible allowing operators to tailor the structure, such as adding or removing headings, to address specific issues or customise the document to their own corporate's policies.
- Operators should draft their DAFP in plain English with any necessary jargon or technical terms clearly defined and explained.

Factors to consider

This Section outlines factors to address in a DAFP. Most of the topics identified below should be considered throughout the DAFP. However, there are some topics (e.g. staff training) which an operator may wish to address separately and specifically as a separate heading within the DAFP.

What the passenger can do to assist

While operators have responsibilities to provide non-discriminatory services and accessible facilities, the DAFPs offer the opportunity to advise passengers what they can do to better access the services provided. For example, passengers who clearly communicate their requirements and with sufficient notice prior to travel, assist operators to provide the necessary services. If there is a preferred manner in which the passenger with disability should communicate their requirements,

the DAFP should explain this and provide contact details or other means through which this can be achieved.

However, operators are advised to use language which is respectful of the potential need for passengers with disability to travel at short notice.

Airline operators have found that some passengers with disabilities elect not to give advance notice of their particular needs, or that some passengers whose disabilities are not readily apparent choose not to bring their disability to the attention of the operator at any stage of the process. It is acknowledged that non-identification of a disability can result in potential safety risks for the operator, but it is hoped that by communicating the tailored services which are available to passengers, the DAFPs will encourage the early sharing of information between the passenger and operator.

Physical infrastructure

Specific equipment is often required to assist with the smooth transport of people with disabilities and mobility aids. As smaller operators have less capacity, it is important that they communicate what equipment they can or cannot offer. Factors to consider communicating include:

- Devices for lifting passengers onto and off an aircraft when the passenger would otherwise, but for their disability, use stairs.
- Assistance for passengers with reduced mobility, to and from, and into and out of their seat.
- Availability and suitability of operator wheelchairs.
- Transportation of mobility devices in the cargo hold and any related safety requirements.
- Appropriate fittings on aircraft, like moveable arm rests (to assist in the seating process for mobility-impaired persons) and tactile components (Braille and other navigational aids) in the cabin and toilets.
- Appropriate fittings in an airport terminal, or on an aircraft, like tactile ground surface indicators (TGSIs), teletypewriters (TTYs), Braille signage and use of TV captions.

Service provision

All competitive businesses aspire to deliver quality customer service, however, a significant number of disability or access-related complaints arise from poor service provision. Factors to consider include:

- Effective communication:
 - within the organisation, especially between booking, check-in and handling areas;
 - with other organisations, such as other operators, or service and retail providers and related government agencies, to ensure a smooth transfer within a terminal, between terminals and/or travel sectors; and
 - through an identified go-to person or role authorised to respond quickly to issues that may arise during the travel experience.
- Providing direct assistance to passengers where available – operators may wish to outline in their DAFP where, when, and to what extent, direct assistance is available and how it can be accessed.
- Where direct assistance is not possible, what processes are in place to assist a passenger with disabilities to navigate their own way to the next step in the process (e.g. TGSIs, signage etc.).

- Flexibility in systems to adapt to changed circumstances (e.g. when an airline reservation does not accurately reflect the specific needs of the passenger, there is a last minute change of aircraft type or the passenger is travelling at short notice)
- Staff resourcing, particularly when it's known that a passenger with disability will be travelling.

Staff training

A key aspect of airline and airport operators working successfully with passengers with disability is how airline and airport staff are trained to provide assistance to passengers with disability. This includes training standards required for staff of contracted companies, such as security screeners.

In developing training programmes, operators are encouraged to engage with representatives of disability organisations in the preparation and delivery of training.

In training staff, the following should be covered:

- awareness of the different types of disabilities and the forms of assistance that could be provided to the passenger;
- how to build rapport with the passenger, including appropriate language and behaviour;
- company policies on disability, including medical requirements and operational reporting; and
- appropriate handling of the passenger's equipment or aids, such as the correct handling of mobility aids, including dismantling, packing, unpacking and assembling these aids.

'Staff Training - Guidance Material' is a high level outline of the kinds of matters that should be considered and is available on the Department's website at:

<<https://infrastructure.gov.au/aviation/aaf/index.aspx>>

There are a number of private sector organisations that offer training for organisations around disability awareness and confidence.

Variation in service levels

Inconsistency in the level and nature of service across the varied operations of an airline can cause major problems for passengers with disability. It is acknowledged that differing service levels cannot always be avoided but their impact can be minimised where there is effective communication to notify affected passengers.

The DAFP should indicate the operation constraints for particular services and provide alternative approaches to obtaining assistance. One example is where an airline has a code share arrangement with another airline. The airline should inform the passenger of this arrangement and the steps they can undertake to ensure that the assistance they need is provided for both flights.

Future commitments

Changes to technology or operations, and upgrades or acquisition of equipment have the potential to result in significant improvements in disability access (e.g. an airline's addition of a new type of aircraft to their fleet). Where possible, airlines and airport operators are encouraged to outline disability access improvements that they expect to implement in the future.

Section 4: Implementing and Reviewing the DAFP

Implementation

Sufficient awareness of DAFPs and similar information is essential for ensuring that passengers who need access assistance are put in touch with the relevant information. Operators should inform passengers when possible of the existence of DAFPs, such as when reserving tickets.

Airline and airport operators are encouraged to use the following approaches when uploading the DAFP on their website:

- place their DAFP as near to the homepage as possible;
- provide the DAFP in an accessible format;
- ensure the DAFP is easily found through the website's search function; and
- use a relevant visual symbol on the operator's homepage that links directly to the relevant section of the website or directly to the DAFP. A suggested symbol is the international access symbol for persons with disabilities shown in Figure 1.



Figure 1: International Access Symbol for Persons with Disabilities (ISO 7001)


In addition, operators could provide complementary media, such as a map or an instructional video, to further inform passengers. The use of complementary media would provide another method through which passengers can access the information in the DAFP, particularly if they have reading or comprehension difficulties.

In implementing the DAFPs, operators should consider the role of other service providers as a passenger with disability may engage with multiple service providers through their journey, including airlines, airports, customs and immigration, security screening operators, public transport organisations, retail stores and restaurants. Communication and active engagement with other service providers could provide a more complete travel experience.

Review

Airline and airport operators should review their DAFPs regularly, for example as part of regular website updates. It is also important to review the DAFP when there is a major change to infrastructure or operational policy. This will ensure that the DAFP remains an effective and up to date tool to support passengers with disability.

In implementing and reviewing DAFPs, it is strongly encouraged that airline and airport operators regularly engage with the disability sector in order to monitor the effectiveness of the DAFP as well as obtaining feedback on potential areas for improvement.



The method of engaging with the disability sector is ultimately a decision for each operator. However, some possible approaches include:

- engaging directly with national or local disability bodies;
- conducting focus groups where people with disabilities to identify areas for improvement;
- ensuring that there is a local disability sector representative on the airport's Community Aviation Consultation Group who can provide advice of disability access matters; and
- establishing a network of interested individuals who could provide disability related advice about proposed new or changes to existing operational and facility arrangements.

Section 5: Contact details for interested stakeholders

In preparing or reviewing DAFPs or in undertaking other disability related activities, airlines and airports should aim to consult with interested stakeholders for assistance and advice.

The Department can assist operators to identify more appropriate points of contact within the disability sector.

However, as a starting point, operators may consider approaching the following organisations to consult on the development or revision of a DAFP.

- Australian Federation of Disability Organisations
- Deafness Forum of Australia
- National Disability Services / Australian Blindness Forum (The Royal Society for the Blind)
- Physical Disability Australia
- Australian Human Rights Commission
- Civil Aviation Safety Authority

The Department can be contacted by email at <AAF_Secretariat@infrastructure.gov.au> or by telephone on (02) 6274 6848.

There is also general information on disability access issues relevant to the aviation environment on the Department's website at <<https://infrastructure.gov.au/aviation/aaf/index.aspx>>.