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COMMENTS ON THE CONSULTATION DRAFT

NAPTAC WHOLE OF JOURNEY GUIDELINES

. Virgin Australia (VA) welcomes the sharing of these Draft Guidelines addressing some of the recommendations of the Second Review of Transport Standards.

. While the primary thrust of these Draft Guidelines is directed to forms of public transport other than aviation, they do contain both a conceptual approach and valuable perspectives on specific elements of the "journey" which are equally relevant for air carriers:

- As has been clear in discussions within the AAF, the aviation sector does impose specific challenges in responding to the Universal Design concept and indeed specialised and adapted features are a reality facing all carriers;

- This is complicated by the fact that airlines, including VA, do not control many of the physical characteristics of the aircraft which they operate, nor do airlines control the layout of major elements around and within the airport terminals across Australia.

. This in no way dilutes VA's commitment to the principle of providing an equitable, consistent, safe, accessible and dignified travel experience to all guests, including those from the disability communities.

. VA has drawn on the context and specific elements set out in these Draft Guidelines in its current revision of the company's Guest Accessibility Plan which will be finalised shortly.

. VA believes that the Draft Guidelines' format in exploring the traveller's journey by stage is an approach which most readily identifies the specific issues which need to be addressed.

Our comments below follow the Journey stages identified in the Draft Guidelines.

3.1 Pre-Journey Planning:

. Given the variation in terminal layouts, access arrangements, passenger handling, and aircraft types, the need for air carriers to provide clear and timely advice to travellers is important in order to ensure a seamless experience. VA believes that the issues identified in para.3.1.1 are central to this process. VA is conscious of the need to make this information available through all potential contact points including our Guest Contact Centre, on-line information and mobile platforms. Communication between the passengers and the carrier,

including on any particular needs, is essential to set realistic expectations and ensure the best possible management of individual's journeys.

3.2 Journey Start-to-End

. The whole-of-journey experience is increasingly central to air travel and considerable work is being conducted both domestically and internationally on the implications for carriers, airport operators and other transport providers. Given the variability of accessibility options currently available, carriers should endeavour to convey as much information as possible on those elements over which they have control and, where possible, how those accessibility options interface with other components of the transport journey.

3.3 Public Transport stop, station and terminal

. As noted in the Draft Guidelines, the interface between arrival (and departing) vehicle operators, airport operators and airlines is complex. Terminals which were designed in the past are often difficult environments within which to provide the desired level of service.

. VA is continuously evolving its in-terminal operations so as to improve accessibility and service provisions. For example, VA has in place the concepts of differentiated uniforms, concierges, and announcements.

. Unlike other public transport providers, airlines face particular challenges in the facilitation of passengers' movement from check-in, through security screening, within the terminal and in boarding of the aircraft. VA is committed to communication with various disability groups and individuals so as to improve the service flow of this journey.

3.4 Public Transport Service

. While working to provide an environment in which every passenger can maximise their independence and have a safe, comfortable and dignified experience, the reality of air travel is that there is often a higher-than-normal (when compared to other modes of public transport) requirement for assistance by airline staff whether in boarding, accessing the seating, disembarking and handling of baggage.

. It also needs to be acknowledged that airlines cannot guarantee a consistent access experience across diverse aircraft types. It is clearly desirable that the passenger has the maximum available information as to the expected specifics of their flight; equally the carrier may be required to use an alternative aircraft type (and thus different access/service provisions) for operational reasons. The key point is to convey to the passenger as early as possible what such changes mean for their journey and for the carrier to be pro-active in adjusting the service delivery to minimise as far as possible disruptive impacts.

. VA is working on enhancing its ability to communicate any expected down-line changes to guests while the passenger is awaiting boarding or is actually on board an aircraft; this allows the passenger to prepare themselves and to seek additional assistance if required. Wireless connectivity will play a significant role in spreading this capability.

. As has been discussed in the AAF, VA and other carriers are also very conscious of the limitations which aircraft types have in providing the optimal service to access guests, including in areas such as on-board wheelchairs, toilet access, and assistance animals.

3.5 Interchange

. In addition to the points made in the Draft Guidelines in respect of "connectivity" interfaces with other public transport modes, airlines face additional challenges in the connectivity environment in respect of connecting flights (especially in the domestic to international or vice versa scenarios) which often require movement between areas in their own terminal, between physically separated terminals or between different carriers. The ability of airlines to enhance services in these areas is often constrained by design or other systems which are beyond their control.

. VA has been working to strengthen its information services within terminals and particularly to provide enhanced audio services.

3.6 Return Journey Planning

. Air travel usually provides a re-trace pathway but it is possible that a passenger will travel from different terminals or on different carriers. Again clarity of information in the selection of the journey and in the booking process can help the passenger prepare and be confident as to the levels of service which may be expected.

3.7 Disruption

. Disruption in the aviation environment brings additional challenges. VA handles "Planned" disruption incorporating the communication and additional assistance elements as suggested in the Draft Guidelines.

. The nature of operations in air travel is subject to "unplanned" disruptions resulting from weather, airspace congestion, engineering, and passenger health issues. VA is committed to the principles of equity of treatment and the best possible levels of support to all passengers in these situations.

3.8 Supporting infrastructure

. VA is conscious that way-finding and facilities within terminals are significant issues; however, these are often beyond the control of individual carriers. VA is engaged in ongoing dialogue with airport operators in respect of these issues.

. As the Draft Guidelines indicate, VA believes the "soft" infrastructure is central to the passenger's experience. VA is committed to ongoing staff training and performance monitoring to improve the ability of front-line and support staff to sensitively and effectively interact with access passengers.

. VA also welcomes feedback from individuals and access groups which can help us strengthen our services.