

**Spinal Cord Injuries Australia submission to the
2012 Disability Standards for Accessible Public
Transport Review Issues Paper - July 2014**



scia
Spinal Cord Injuries Australia



Disability Standards for Accessible Public Transport 2012 Review

Introduction

Thank you for providing Spinal Cord Injuries Australia (SCIA) with the opportunity to make this submission to the Disability Standards for Accessible Public Transport (Transport Standards) 2012 Review Report (released May 2014), which is further to the submission SCIA made to the Transport Standards 2012 Issues Paper (released 2013), and of which a number of the issues raised by SCIA were referenced in the 2012 Review Report.

SCIA has been providing a variety of services and programs to support people with a spinal cord injury resulting in paraplegia and quadriplegia, and similar physical disabilities, since it was established in September 1967. SCIA is committed to providing services that reflect its mission statement of "Life without Barriers", both in its own services, programs and facilities, as well as for all government, community and commercial services, programs and facilities.

Apart from raising issues and providing comments against each of the seven recommendations of the 2012 Review Report, this submission has included some feedback and comments about the other areas contained in the 2012 Review Report including the Implementation of the 2007 Review Recommendations, Effectiveness of the Transport Standards and the Efficiency of the Transport Standards.



SUBMISSION:

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Transport Standards Summary of recommendations

Recommendation 1 — National reporting on compliance

That the Australian Government, jointly with state and territory governments, establish a national framework for reporting on compliance by 30 June 2016.

SCIA Response to Recommendation 1:

SCIA supports the recommendation for national reporting on compliance by June 30, 2016. As the majority of public transport providers and operators are state and territory governments, or private companies providing public transport under licence to the state or territory governments, plus there is a large number of private and/or commercial transport operators and providers, what would be the estimated cost of undertaking the audits for establishing whether transport providers and operators were compliant with the standards?

- Would there be any Federal Government funding to assist with the undertaking of the audits and reporting?
- Would there be any 'penalties' implied to transport providers and operators that were non-compliant?
- As transport operators and providers may be non-compliant with the standards, it could expose them to be subject to any imposed 'penalties' and possible reluctance to report accurately, so will there be a requirement for transport providers and operators to use independent private or government organisations to undertake the compliance audit and reporting?
- Would there be any Federal Government funding to assist with the upgrading of transport conveyances, facilities and services to assist with compliance?

Recommendation 2 — Modernise the Transport Standards

That the Australian Government, jointly with state and territory governments, commences a process for updating and modernising the Transport Standards. This work should be undertaken in close consultation with local government, industry and the disability sector, and include research on the technical issues raised in this review, the development of options, and assessment of the impact of any proposed changes to the standards, with this work to be completed by 30 June 2016.



SCIA Response to Recommendation 2:

SCIA supports the recommendation to modernise the Transport Standards. Furthermore, SCIA believes there would be improved outcomes for all stakeholders if parts of the Transport Standards, and the accompanying guidelines, were 'prescriptive' and possibly included diagrams, with the aim of the Transport Standards not being misinterpreted.

SCIA raised this issue in its submission to the 2012 Transport Standards review providing the example of the current situation with the design of some vehicles being modified to operate as wheelchair accessible taxis which have inadequate room to accommodate some people using mobility aids.

Recommendation 3 — The complaints process

That the Australian Government considers the concerns raised about the complaints process.

SCIA Response to Recommendation 3:

SCIA supports the recommendation to consider the concerns raised about the complaints process.

SCIA raised this issue with its submission to the 2012 Transport Standards Review providing the example that the Disability Discrimination Act requires an individual to make a complaint to the Australian Human Rights Commission and if the conciliation is not completely or partially successful the complainant has to make a decision as to either drop the complaint and allow the discrimination to continue or to pursue the complaint through the court system, which has a costs jurisdiction and a major deterrent for people with disability to pursuing complaints through the court system.



Recommendation 4 — Whole-of-journey accessibility

That the Australian Government, jointly with state, territory and local governments, develop accessibility guidelines for a whole-of-journey approach to public transport planning by 31 December 2015.

SCIA Response to Recommendation 4:

SCIA supports the recommendation for the whole of journey accessibility.

Until all modes of public transport are (wheelchair) accessible, public transport providers and operators not only need to develop plans for a whole of journey accessibility, they need to ensure the plans are implemented with appropriate resources and support systems, including scheduling and information.

Recommendation 5 — National motorised mobility aid labelling scheme

That the Australian Government in collaboration with state and territory governments to develop and implement a national motorised mobility aid labelling scheme.

SCIA Response to Recommendation 5:

SCIA believes that it is important for people with disability to use mobility aids that meet their individual needs, in regard to comfort, mobility and functionality and to be fully aware of how and/or where the mobility aid can be used, including accessing buildings, the built environment and of course transport services and facilities.

The Transport Standards includes minimum requirements of the quantity, size and dimensions of the minimum allocated spaces for public transport conveyances when transporting people "occupying" mobility aids, as well as the maximum weight requirements for boarding ramps. Although the inclusion of a "compliance" label for the mobility aid identifying the weight and dimensions of the mobility aid may provide people with disability with details to enable them to make an informed choice when selecting the mobility aid, it may be difficult, if not impossible, for transport operators and providers to estimate what the combined weight of the "occupied" mobility aid is and whether it exceeds the Transport Standards maximum 300 kg weight capacity for boarding ramps.



Furthermore, due to the wide variety of mobility aids available with different weight and dimensions, SCIA believes it would also be extremely difficult and impractical to develop and implement a National Motorised Mobility Aid Labelling Scheme, as it would need to incorporate the combined weight of the mobility aid, the occupier and in conjunction with the content of any bags being transported on the mobility aids, which is common practice.

For many people with significant physical disability, particularly people who are unable to weight bear, it can be difficult to measure their weight. Often this can only be done in a hospital/medical environment where there is a mobile floor or ceiling hoist with a weight scales attached. Although the mobility aid manufacturer and/or supplier could label mobility aids with their weight, as well as their length (to confirm it is within the Transport Standards minimum allocated space requirements of 1300 mm long x 800 mm wide), the "combined" or total weight of the occupied mobility aid may need to be obtained when trialling/assessing a mobility aid.

Without the use of appropriate weight scales attached to the hoist to obtain the "combined" weight of an occupied wheelchair it requires specially made ramps with joining crossbars which are placed across domestic (non-digital) weight scales that have a capacity exceeding 300 kg. This type of weight measuring equipment could be provided by the mobility aid supplier to be used when people with disability are being assessed and trialling mobility aids.

However, in conjunction with media reports that there is an increasing number of Australians who are above the average weight or obese, SCIA is aware of an increasing number of people in this category who use power mobility aids, so there is an educated guess that many of these people would exceed the 300 kg maximum weight capacity for boarding ramps. SCIA believes that people with disability who are above the average weight and/or obese who are being assessed and/or prescribed/provided with a powered mobility aid must be informed that they may not be able to safely access public transport if the combined weight exceeds 300 kg, particularly if accessing the transport includes using boarding ramps.



Recommendation 6 — National wheelchair accessible taxi compliance milestones

That the Australian Government, jointly with industry, state and territory governments, develop consistent national compliance milestones and response times for wheelchair accessible taxis by 30 June 2016.

SCIA Response to Recommendation 6:

SCIA supports this recommendation as it believes that people with disability should not only have equitable access to public transport conveyances and infrastructure, but should also be provided with equitable services including response times by wheelchair accessible taxi services to meet the needs of people using mobility aids.

However, although there are an increasing number of wheelchair accessible taxis (WAT) being introduced into the taxi services, with approximately 11% of the NSW taxi fleet having wheelchair access, there are various areas throughout the Sydney Metropolitan, rural and regional areas that are not receiving equitable services due to long delays in response times and vehicle unavailability. There are some rural and regional towns that do not have WATs at all.

Furthermore, although the state and territory governments are the major public transport providers and operators, which include taxi services, and implement the transport regulations and the passenger transport acts, the structure of the taxi industry has the taxi networks responsible for accepting bookings from passengers and offering them to taxi drivers who either accept or reject bookings. Although each taxi is required to be connected to a taxi network to receive jobs on offer, every taxi is operated as a small business by a taxi owner, owner/operator or a bailee driver. Due to this, it can be problematic and very difficult to ensure bookings by passengers are being accepted, and responded to within the compliance milestones.

The 2010 NSW Taxi Industry Inquiry undertaken in NSW Parliament made the recommendation to develop a 10 year plan to increase the WATs from the current 11% up to a minimum 50% of the overall taxi fleet with the aim of improving taxi services and response times. The NSW Government's response to the recommendations was to "agree to it in principle" but to continue to explore ways of improving the WAT service, including in rural and regional areas, where free WAT taxi licences are offered amongst other government initiatives to offset the cost of placing WAT in service.



Recommendation 7 — Review of Disability Access Facilitation Plan

That the Department of Infrastructure and Regional Development, in close consultation with the Aviation Access Forum, undertake a review of the Disability Access Facilitation Plan initiative by 30 June 2015, with the aim of improving the overall effectiveness and accessibility of the plans.

SCIA Response to Recommendation 7:

SCIA supports this recommendation as it provides the opportunity for airline operators to identify its operations, services and facilities with the opportunity to continually review and improve same. However, SCIA believes that with any type of plan the operator must be required or ensure that appropriate resources are provided, including identifying and supporting relevant staff, to implement, monitor and review the plan to make it effective.

Furthermore, in regard to the budget airline operators that are currently supporting and implementing the "Two Wheelchair Policy", SCIA would like to believe that these operators would be able to use the Disability Access Facilitation Plan to reassess the way they provide services and facilities for passengers with disability, particularly passengers who use mobility aids, as SCIA believes the Disability Discrimination Act and related Transport Standards, are being undermined by such policies.

Also, as SCIA made a submission to the "Two Wheelchair Policy" Review, in which it raised a number of issues and provided some options to address current practices to improve services for people with disability who use mobility aids, it has been included with this submission to support this recommendation to review the Disability Access Facilitation Plan. [See Attachment].

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As previously mentioned in the introduction to this submission, the following comments are in regard to the issues raised in the 2012 Transport Standards Review Report in regard to the implementation of the 2007 Transport Standards review recommendations, the Effectiveness of the Transport Standards and Efficiency of the Transport Standards.

Implementation of the 2007 Review recommendations

Issues:

Although there were 15 recommendations made in the 2007 Transport Standards Review Report, it is reported that only 10 of the recommendations were supported and of which only three of the recommendations were completed due to a variety of reasons including:

"a lack of agreement between jurisdictions, transport providers and the disability sector on the adequacy or otherwise of existing services, the technical challenges posed by some of the Transport Standards and/or a lack of funding".

Apart from the reasons listed by Infrastructure, SCIA believes that there was inadequate time for the recommendations to be implemented prior to undertaking the 2012 Transport Standards review. Notwithstanding the reasons given for the 2007 Transport Standards Review recommendations not being implemented, and there are 7 recommendations being made in the 2012 Transport Standards Review Report, SCIA believes that there are a number of 2007 Transport Standards Review recommendations that should be implemented as they would improve accessibility, efficiency and effectiveness of various modes of transport conveyances, infrastructure, services and facilities, and that the 2012 recommendation for labelling of mobility aids will be difficult if not impossible to implement.

From the complete list of 2007 Transport Standards Review Recommendations below SCIA would like to recommend Recommendations 3, 4, 7, 8, 11, 13 and 14.



2007 Transport Standards Review Recommendations

Recommendation 1:

Establish a national framework for Action Plan reporting and require annual reporting by each State and Territory government

Recommendation 2:

Request the Australian Bureau of Statistics to include questions on public transport patronage in their Disability surveys

Recommendation 3:

A technical experts group be convened, with Standards Australia, to develop technical standards specifically suited to public transport conveyances and infrastructure. Once developed, these Standards should be referenced in the Transport Standards, and made available for public use

Recommendation 4:

Mode specific guidelines be developed by modal sub-committees. These guidelines would be a recognised authoritative source for providers, which can be used during a complaints process

Recommendation 5:

A mobility labelling scheme be developed which identifies the weight of the aid and whether its dimensions fit within the dimensions for allocated spaces, boarding devices, access paths and manoeuvring areas on conveyances, as specified in the Transport Standards

Recommendation 6:

A best practice clearinghouse be established in a government agency or research body to collect and disseminate best practice solutions and ideas relating to accessible public transport

Recommendation 7:

Commonwealth, State and Territory governments provide funding for projects in regional and rural regions where local governments are unable to resource upgrades of public transport infrastructure

Recommendation 8:

The Australian Human Rights Commission be tasked to provide greater support for representative complaints on behalf of people with disability, reducing the legal cost burden on individuals

Recommendation 9:

New governance arrangements be implemented to establish accountability for progressing recommendations from the five-year review. APTJC should have coordinating responsibility for new initiatives (including modal committees and the technical experts group) in partnership with APTNAC

Recommendation 10:

The 2017 compliance milestone for tram conveyances and infrastructure be reduced from 90 per cent to 80 per cent to better reflect vehicle replacement cycles



Recommendation 11:

The taxi modal sub-committee be tasked with developing a staged implementation timeframe similar to that for other modes of transport, and an appropriate performance measure, to replace the 2007 milestone for WAT compliance

Recommendation 12:

Government commission research into the safety of passengers travelling in conveyances whilst seated in mobility aids (including scooters). This research should make recommendations around whether there is a need for an Australian Standard addressing this aspect of safety for mobility aids

Recommendation 13:

The Transport Standards be amended to require new community transport vehicles greater than 12 seat capacity to comply with the Transport Standards commencing in 2017, (with full compliance by 2032)

Recommendation 14:

Phased application of dedicated school bus services to physical access requirements in the Transport Standards, commencing in 2029 and being fully required by 2044

Recommendation 15:

Air travel modal sub-committee (the Aviation Access Working Group) be tasked to develop guidance on the carriage of mobility aids on aircraft

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Effectiveness of the Transport Standards

Issues:

Although the 2012 review report states that the majority of the December 2012 compliance targets had been met, there are reports that the majority of bus stops/shelters are non-compliant with the Transport Standards (in regard to the design and structures) as well as the minimum 55% milestone.

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Efficiency of the Transport Standards

Issues:

Although the Transport Standards are a national requirement with Federal Government jurisdiction, it is the Australian state and territory's that provide public transport and are deemed the major public transport providers and operators. The local councils are generally responsible for the installation of bus stops.

Although many of the private transport operators and providers are claiming that it is costly to upgrade existing services, generally the conveyances (buses, ferries, trains and light rail), all public and private transport providers and operators should



undertake a Disability Action Plan to identify the requirements for current and future transport conveyances, infrastructure and services to be compliant with the Transport Standards, as well as the relevant milestones.

In conjunction with this, the NSW Government has introduced a Bill into Parliament that will require all NSW Departments to develop and implement a Disability Action Plan and provide appropriate resources to deliver the requirements of the Disability Action Plan. Generally Disability Action Plans incorporate an audit of all Department services and facilities and implement the related tasks, resources and timelines for non-compliant areas to be addressed.

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Again, thank you very much for providing SCIA with the opportunity to make this submission to the 2012 Transport Standards Review Issues Paper.

If the Department would like SCIA to provide more information or to clarify any of the content within this submission please do not hesitate to contact the SCIA Policy and Advocacy Team.

Regards,

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**Spinal Cord Injuries Australia's comments on the revision of
the Australian "two wheelchair" policy for people with
disability**





Introduction

Spinal Cord Injuries Australia (SCIA) would like to thank the Department Of Infrastructure and Regional Development for providing the opportunity to give feedback and comments on the "Two Wheelchair Policy" review currently implemented by a number of Australian domestic airline carriers.

SCIA has been providing a variety of services and programs to support people with a spinal cord injury resulting in paraplegia and quadriplegia, and similar physical disabilities, since it was established in September 1967. SCIA is committed to providing services that reflect its mission statement of "Life without Barriers", both in its own services, programs and facilities, as well as for all government, community and commercial services, programs and facilities.

The Australian Government sees the ability to move around the community underpinning all aspects of life for people with disability. The National Disability Strategy, launched 21 March 2011, seeks to guide public policy across governments to ensure that people with disability have the same opportunities as other Australians.

Supporting the National Disability Strategy (NDS) the *Disability Discrimination Act 1992* (the DDA) prohibits both direct and indirect discrimination on the grounds of disability, both to the person with a disability as well as family members, carers and friends.

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. The Disability Standards for Accessible Public Transport - 2002 (Transport Standards) and Access to Premises Standards - 2011, and their guidelines, were implemented to ensure transport operators and providers understood their obligations and could implement services, facilities and infrastructure that were compliant with minimum standards with specific five yearly milestones. In Australia, all public transport is required to be accessible by 2022.

Furthermore, Australia ratified the United Nations Convention on the Rights of Persons with Disabilities on 17 July 2008, making it one of the first Western countries to do so. By ratifying the convention, Australia joined other countries around the world in a global effort to promote the equal and active participation of all people with disability.



Due to the above-mentioned , SCIA believes all people with physical disability should have the same opportunities as all other members of society, which includes being able to participate as active citizens in employment, educational, cultural, recreational, social, religious and political arenas. Due to the limitations and negative impact on people with disability, their family, friends and carers caused by the "two wheelchair" policy currently being implemented by some of the low-cost airline carriers , SCIA is completely opposed to this policy and supports the recommendations made by the Department which included:

Department proposes that the Australian domestic airlines, which currently have a two wheelchair policy, update their Disability Access Facilitation Plans and operating practices to:

- *not have a limit of two wheelchairs per flight but rather advise passengers there are operational circumstances where the airline may not be able to carry more than two passengers requiring wheelchair assistance;*
- *emphasise the importance of passengers requiring wheelchair assistance to contact airlines as early as possible before their preferred flight to check the airline can provide appropriate assistance; and*
- *ensure airline booking processes prompt passengers to provide the airlines with information about their mobility assistance requirements and notify passengers as early as possible if the airline is unable to carry the passenger requiring wheelchair assistance on their preferred flight, and offering these passengers alternative flight arrangements.*

SCIA does understand the concerns and issues raised by the low-cost airline carriers, with the two wheelchair policy being implemented by Jetstar, Virgin Blue, Rex Airlines and Tiger Airlines, however, Jetstar's parent airline 'Qantas', does not implement this policy, but SCIA supports the need for this two wheelchair policy and procedures to be reviewed, and is encouraged by the draft review's topic of "Possible Ways Forward".

Although SCIA believes all passengers should be receiving equitable services to meet their needs and not be "categorised" according to having a disability or not, SCIA believes the International Airlines Transport Association's (ATA) Classification System has some merit if it can assist airlines to provide services to meet the needs of all



passengers. The ATA Classification System provides the ability for airlines to mix-and-match the number of passengers with a disability to try to curtail the potential delay in aircraft turnaround times of which Jetstar successfully argued that these delays caused "unjustifiable hardship" in a recent disability discrimination complaint. However, SCIA believes that all airlines need to ensure that their services for people with disability are "person centred" and cater for each person with disability's individual needs. This might require a more dynamic classification system which could easily be done with appropriate computer programming, in conjunction with airline staff training in the procedures, and an awareness campaign for all stakeholders including people with disability.

People with disability who are planning to book flights need to be made aware of the importance of identifying the level of assistance they may require, in conjunction with the airlines assuring people with disability that the request for this information is being collected with the aim of the airlines delivering the best possible service available for all passengers and airline staff alike. And it is not to be used to exclude potential passengers with physical disability. Furthermore, when passengers with disability who use mobility aids book on aeroplanes in advance, SCIA believes the airlines have appropriate time to ensure the staffing levels are adequate to assist in such passengers.

Although all stakeholders have identified a number of issues affecting the airline service delivery, with possible solutions, often the biggest barrier impacting on a way forward is the negative attitude about people with disability by the airlines senior management and policy developers. This negative attitude towards people with disability is reflected in the way airlines give priority to their commitment and contracts around carrying freight over passengers with disability.

This is highlighted in (section 2.f) of the *Policy Paper - Airline Two Wheelchair Policies (Section 2.f) Freight Commitments*, which states:

Some airlines have agreements with transport companies for the provision of freight services. Changes to two wheelchair policies may mean airlines are unable to meet freight commitments because cargo space has been taken up by additional wheelchairs. This has the potential to expose airlines to financial penalties for failing to meet their service contract which may ultimately result in increased passenger fares to ensure operating costs are covered.

As all transport services are required to be compliant with the *Disability*



Discrimination Act (DDA) 1992, and Its Associated Disability Standards for Accessible Public Transport (the Standards), SCIA believes that the rights and needs of people with disability should have priority over the transportation of freight. Furthermore, the Federal Government is a signatory to the UN Convention on the Rights of Persons with Disability, and the Federal Government implemented the National Disability Strategy, which sets the Federal Government agenda to support the rights and needs of people with disability for all aspects of their life, including transport.

Although SCIA does not agree with the current Two Wheelchair Policy and supports the recommendations made by the Department, SCIA would be keen for the Department to obtain a better understanding of the current "reported" impact on all stakeholders. This impact could be obtained through an independent review of current policies and procedures, communication systems and operational systems, including the current cost of limiting the number of people using wheelchairs, in conjunction with the estimated cost of increasing the minimum number of people with disability who use mobility aids on each flight and the level of airline staff required to provide such assistance. The review could also consider the type and level of services, staffing and resources required to provide for a greater number of people using wheelchairs to access the same aircraft throughout the day including peak periods and off-peak periods.

As the submissions to the Department highlighted a number of issues around the lack of communication between the airlines and passengers with disability, especially the scenarios when passengers had made bookings months in advance but on arrival to the airport were informed that they were unable to access the aircraft, SCIA believes that the airlines need to be except ownership of the issue and to be held accountable. SCIA would like to recommend that the Standards incorporate the requirement for mandatory reporting by airlines of such incidences. The incidences should be reported to an independent authority, with the aim of understanding the cause of the issue and developing procedures to address them.

In regard to the submission to the Department by one airline that stated:

One airline states that while the two wheelchair policy may cause inconveniences for some passengers, overall the policy successfully meets demand. The airline stated that in the financial year 2012/2013, there were 46,797 passengers requesting wheelchair assistance, which amounts to approximately 0.542 passengers per flight.

The above-mentioned data on passengers with disability requesting wheelchair assistance works out to be approximately one passenger with disability on every second flight, or two passengers with disability on every fourth flight. The airline also acknowledged that there are an increasing number of requests by people with



disability seeking wheelchair assistance.

SCIA believes that the current level of passengers with disability using mobility aids may not have the stated negative impact on airlines as being reported as the airlines are aware of how many people are using mobility aids are booked on to each flight. The airlines should ensure there is an appropriate level of staff, in conjunction with appropriate operational systems and communication, to ensure there is a seamless service to minimise the time it takes to provide assistance to passengers with disability who use mobility aids, as well as when transferring the mobility aid between the passenger and the aeroplane hold.

SCIA observes an interesting comment from an airline that:

Delays can also have adverse effects for customer perceptions of a particular airline's performance.

However, there are no comments from airlines about how there may be an adverse effect for customer perceptions about the way the airlines treat people with disability and the negative impact on people with disability by the implementation of the Two Wheelchair Policy.

One airline reported that there is a time and motion study with the approximate time to provide assistance to a passenger with disability and transfer and store the mobility aid into the aircraft hold is between 9-17 min, and highlighting the potential costs associated with assisting more than two passengers with disability per aircraft per flight, as the low-cost airlines also transport freight. SCIA would like to request the Department enquire if there are any or many incidences of delays being caused to airlines due to the handling and loading of freight that the low-cost airlines have contracted, which could also be done during an independent review.

Furthermore, people who travel regularly on airlines have reported that they have experienced incidences where the aeroplane they are travelling on is delayed in taking off by up to 20 min without any explanation from the aeroplane pilot or cabin crew when there are no passengers with disability using mobility aids travelling on the aeroplane.

As the DDA and the Standards were implemented prior to the majority of budget airline carriers commencing operation, SCIA would like to request the Department to enquire if the airlines had considered the minimum requirements of the DDA and Standards for the transportation of passengers with disability in their business plans prior to commencing operations, and whether any or all of the airlines had made



submissions to the appropriate aviation Department identifying any potential negative financial and operational impact on the airline business if and/or when a passenger or passengers with disability were to be transported. Or was the Two Wheelchair Policy developed and implemented after the budget airlines commenced operation?

SCIA believes there are probably a variety of issues that have a fluctuating impact on financial and operational services and systems of all airlines, particularly low-cost airlines, such as fuel prices, the value of the Australian dollar, employee's wages, airport fees and charges, government taxes and levies, holiday seasons. In addition with many airlines stating through their annual reports that customer service costs are only about 7% of their total cost outlay, the introduction of the Two Wheelchair Policy may be an "easy" way to attempt to obtain some cost savings when in reality it may only be a small percentage of the costs incurred by airlines.

Summary:

SCIA is completely against the current implementation of the "Two Wheelchair Policy" due to the negative impact and inconvenience on people with disability their family, friends and carers.

As Australia has a number of Federal Government policies, anti-discrimination acts and legislations, including being a signatory to the UN Convention on the Rights of Persons with Disabilities, SCIA believes the Federal Government must ensure such protections are effective so people with disability have every opportunity to participate in all aspects of life. This includes ensuring transport providers and operators, particularly airlines that are trying to diminish the responsibility with the implementation of the Two Wheelchair Policy, are held accountable to operate within the DDA and to be compliant with the Transport Standards minimum compliance guidelines in regard to conveyances, infrastructure and service delivery.

SCIA believes the Department needs to undertake an independent review of all the airline's business operations and service systems to obtain the airline's financial and operational facts. These would include costs such as fuel prices, employee's wages, maintenance, airport fees and charges, fluctuation in demand due to holiday seasons, the value of the Australian dollar, freight transport and contracts, in conjunction with the potential financial implications due to delays in aircraft turnaround times caused by any incident, in conjunction with the implementation of the Two Wheelchair Policy, to clarify the impact of transporting people with physical disability who require mobility aids.

The Department has reported that one of the airlines has stated that it is currently



meeting demand for its services whilst implementing the Two Wheelchair Policy. This is being done in conjunction with reports that the airline is experiencing an increase in bookings by people with disability. So as Australia has an ageing population, and people with disability are living longer in conjunction with being expected to have increased opportunities to participate in all aspects of life with due to the rollout of the National Disability Insurance Scheme, SCIA believes that the airlines should be preparing for this increase in bookings by amending, and phasing out to withdraw the Two Wheelchair Policy.

Conclusion:

SCIA wishes to thank the Department for undertaking the review of the Two Wheelchair Policy and anticipates the Department will give serious consideration to the issues raised, and recommendations made, by SCIA as SCIA anticipates a positive outcome.

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