

SUBMISSION TO THE ALLEN CONSULTING GROUP

On the Draft Report

review of the disability standards for accessible public transport

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Chapter 6

Accessibility of air travel and ferries

Key findings

Air Travel

□ Assessing the accessibility of air travel for people with disability relies largely on qualitative information provided by consumers, airline and airport operators and peak bodies in public hearings and written submissions. With the exception of Queensland, State and Territory Governments do not monitor or report on the accessibility of air travel. Airlines themselves are not required to report on accessibility. Thus, quantitative data on implementation of the Transport Standards for air travel are largely unavailable.

□ In general, the assessment concludes that people with disability are generally able to access air travel, excluding routes that operate small aircraft that are exempt from the Transport Standards.

COMMENT: How can this conclusion be justified when the detailed report states? “However, at public hearings and in submissions individuals and organisations representing people with disability noted a range of difficulties when accessing air travel. A common view was that air travel accessibility for people with disability has gone backwards over the last five years. This view is supported by the submission from the Public Interest Advocacy Centre in New South Wales (sub. 63, p. 25) that analysed 110 case studies from people with disability in relation to air travel.” The ‘Key findings’ in this section of the report would be more accurate if this, and the following sub section, were removed and replaced with the following:

□□□ Experience has been that recent restrictions on the conditions of travel, for example travelling with a carer, limiting access to available space in the body of the plane and in the hold, have constrained access to air travel for people with disability with the result that the airline industry has failed by a large margin to meet the required standard of 25 per cent compliance for ramps, boarding, allocated space, stairs, toilets etc. Blanket policies limiting seating to two wheelchair passengers per flight, regardless of individual disability and assistance needs, are in place and are enforced inflexibly.

□ A range of measures are in place to facilitate access to air travel for people with disability. However, experience has been that recent restrictions on the conditions of travel, for example travelling with a carer, limiting access to available space in the body of the plane and in the hold, have constrained access to air travel for people with disability.

6.3 Accessibility of air travel

Accessibility of aircraft

□ airline information systems were reported as having difficulty managing information about special needs that passengers provided at the time of booking. The consequence is that airlines then need to make arrangements to accommodate special needs such as seating for people travelling with a guide dog or people who require the use of a wheelchair, at the time of check-in or boarding rather than prior to the flight; and

COMMENT: Is difficulty in developing and operating an information system justification for discrimination? The present blanket policy of two wheelchair passengers per flight means the airlines take the ‘easy way out’. They assume all passengers have the most severe disability and require the maximum level of assistance. The answer to the problem is simple:

Passengers wishing to book a flight, and requiring a wheelchair to board the aircraft, should be directed at the outset to a questionnaire. The passenger should be asked:

- 1. Other than provision of a narrow wheelchair, what assistance is needed from airline staff?**
 - 1.1 Transfer to and from own wheelchair to airline wheelchair**
 - 1.2 Transfer to and from aircraft seat**

- 2. Will the passenger be accompanied on the flight by a carer?**
 - 2.1 Can your carer assist you by pushing the airline’s wheelchair and transferring you?**
 - 2.2 Can your carer assist you in attaching your seat belt and in an emergency (eg attaching an oxygen mask)**

- 3. Is your wheelchair collapsible?**
 - 3.1 What is its weight and dimensions when collapsed.**
 - 3.2 If unable to be collapsed what is its weight and dimensions, and battery details, if applicable.**

If intending passengers need only a narrow wheelchair, require no assistance from airline staff, either because of their own ability or the assistance of a carer, there should be no restriction on the number of such passengers, provided the weight and dimensions of the passengers’ own wheelchairs are not abnormal.

If more than TWO intending passengers require assistance in transferring, are not accompanied by a carer and have a wheelchair that cannot be collapsed, then carriage on that flight may be denied, with a full explanation provided to the passenger at the time the booking request is denied.

HREOC to be provided with powers to refer cases of breaches of the Transport Standards directly to the Federal Court.

COMMENT: This is a very important recommendation. At present we have legislation with no one to police it except individual members of the travelling public. If I see a burglar breaking the law, and I know who it is, I can inform the police and expect them to pursue the culprit. With this legislation it seems there is no such entity with the responsibility to enforce the law. This situation has enabled the airlines to implement and apply a discriminatory policy of TWO wheelchair passengers per flight, irrespective of disability, with no redress possible without an individual going to a great deal of trouble and possible expense.