



PEOPLE WITH DISABILITY
AUSTRALIA

**A voice
of our
own**

Aviation Disability Standards

**OCTOBER
2026**

Copyright information

Access to and affordability of medical specialists in Australia – Submission to the House of Representatives Standing Committee on Health, Aged Care and Disability

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Suite 10.01| Centennial Plaza | Level 10, 300 Elizabeth Street | Surry Hills NSW 2010

Email: pwd@pwd.org.au

Phone: 1800 422 015

URL: www.pwd.org.au

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Endorsement

This submission has been endorsed by [Children and Young People with Disability Australia](#) a the peak not-for-profit community organisation representing the rights and interests of children and young people with disability (aged 0-25) in Australia. the



About PWDA

People with Disability Australia (PWDA) is a national disability rights and advocacy organisation made up of, and led by, people with disability.

We have a vision of a socially just, accessible and inclusive community in which the contribution, potential and diversity of people with disability are not only recognised and respected but also celebrated.

PWDA was established in 1981, during the International Year of Disabled Persons.

We are a peak, non-profit, non-government organisation that represents the interests of people with all kinds of disability.

We also represent people with disability at the United Nations, particularly in relation to the United Nations Convention on the Rights of Persons with Disabilities (CRPD).

Our work is grounded in a human rights framework that recognises the CRPD and related mechanisms as fundamental tools for advancing the rights of people with disability.

PWDA is a member of Disabled People's Organisations Australia (DPO Australia), along with the First People's Disability Network, National Ethnic Disability Alliance and Women with Disabilities Australia.

DPOs collectively form a disability rights movement that places people with disability at the centre of decision-making in all aspects of our lives.

'Nothing About Us, Without Us' is the motto of Disabled Peoples' International.

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Introduction

People with disability need equitable access to air travel in order to reach employment and education, access healthcare, essential services, and connect with community. However, airport and airline systems and processes have created barriers to air travel that make the journey inaccessible to many.

From booking a flight to checking in, travelling on the aircraft and disembarking at the destination, people with disability have faced accessibility barriers and discrimination. The Disability Royal Commission held [2 workshops](#) in November 2022 focussed on the experiences people with disability have with aviation. Attendees raised issues related to:

- information accessibility in advance of, during the flight, and when flights change,
- process inaccessibility, from check-in, to booking and security screening
- the physical inaccessibility of seating, boarding processes and bathrooms both on the plane and in airport
- barriers to using assistance, from assistive technologies to assistance animals
- the training of staff and attitudes towards people with disability.

This is in spite of the [Disability Discrimination Act 1992](#) which was supposed to eliminate, discrimination on the basis of disability, and the [Disability Standards for Accessible Public Transport 2002](#) (Transport Standards) that set out the responsibilities of public transport providers and operators, including airlines and airports.

In the 2024 [Aviation White Paper: Towards 2050](#), the Australian Government committed to co-design new aviation disability standards. People with Disability Australia (PWDA) and the Justice and Equity Centre (JEC) approached the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (hereafter called The Department) to develop a process to do this.

PWDA and the Australian Federation of Disability Organisations (AFDO) were appointed to co-chair a working group with the Justice and Equity Centre (JEC), and the Department to develop the co-design process that would inform the drafting of standards that would affirm the rights of people with disability during air travel and clarify the obligations of airlines and airports to provide equal access. The involvement of disability representative organisations from the outset has led to a co-design process reflective of the principle ‘nothing about us, without us’. It has ensured that the issues raised were relevant and that the consultation processes remained accessible, inclusive, and reflective of the needs and concerns of all people with disability from across Australia, with a wide range of experiences.

The [Disability Standards for Accessible Public Transport Amendment 2026](#), which PWDA contributed to and made a [submission](#) on, was tabled in August 2026 containing some elements applicable to air travel, and consultation for the [Aviation Disability Standards](#) opened in the same month. It is expected that once the disallowance period concludes in October 2026, the [Disability Standards for Accessible Public Transport Amendment 2026](#) will become law. Once the draft [Aviation Disability Standards](#) are finalized and become law they will become a part of these amended public transport standards.

Both of these amendments to legislation function together with the [Aviation Consumer Ombuds Scheme](#) that will govern complaints, and PWDA has made submissions on [Aviation Consumer Protection](#), and the [Aviation Customer Rights Charter](#) to make recommendations to ensure people with disability are treated equitably.

Once the Aviation Disability Standards are standards and this associated legislation are finalised and in use, they will provide the aviation sector with greater certainty and clarity about expectations and responsibilities, as well as opportunities to grow their customer base. They will also provide people with disability with greater access to aviation services on a more equal and equitable basis with customers without disability, and to satisfy unmet travel needs.

Summary of Recommendations

Recommendation 1: Apply the regulatory approach to all standards covered by the consultation paper, rather than allowing standards to be optional.

Recommendation 2: When regulating to achieve the standards, provide timeframes for completion, a requirement to report progress and an accessible explanation for things expected to take more than 2 years to achieve.

Recommendation 3: Airports should be responsible for the entire journey through the airport up to boarding and disembarking, and airlines should be responsible for booking, information management and the in-flight experience.

Whole of Journey Options

Recommendation 4: PWDA supports additional training requirements related to safe transfers and the handling of assistance equipment, and we call for all aviation staff and contractors, including security, to receive disability awareness/disability-affirming training appropriate to their role that is co-designed, facilitated and delivered by people with disability.

Recommendation 5: Every Airline and Airport should have a disability reference group, who must be consulted about significant changes that may impact the experience of people with disability. Airports with smaller numbers of customers must still be represented but may have the option of appointing a shared disability reference group for smaller airports within a state or region. Representation must include First Nations people with disability from communities where airports are located.

Recommendation 6: PWDA recommends annual reporting by the aviation industry on how they are complying with the disability specific aviation standards, after an initial audit period of 2 years to generate the first report.

Recommendation 7: PWDA recommends the government create audit and reporting templates to help smaller airlines and airports, rather than exempting them, and to support the creation of auditing jobs for people with disability.

Recommendation 8: PWDA recommends inviting disability reference groups to help set the priorities for audit and reporting.

Planning and Booking Air Travel

Recommendation 9: PWDA supports offering passenger assistance profiles.

Recommendation 10: If airlines limit the number of passengers on a flight who require assistance to board and disembark, the limit for that flight must be published at the time a passenger books. If it is for any reason other than safety, the reasons must also be published.

Recommendation 11: If a person informs the airline of the assistance services they require:

- at least 48 hours before departure, then the airline/ airport must provide that service and confirm with the person in writing
- less than 48 hours before departure, then airlines may only decline to provide the service for safety and genuine operational reasons, which must be published.

Recommendation 12: People with disability must not be required by airlines to book over the phone and must be able to access the same fares as other customers regardless of the method of booking.

Recommendation 13: PWDA supports the proposed regulations for seeking approval to fly with an assistance animal, for check-in, the carriage of the animal in the cabin and for relief accessories.

Recommendation 14: We call for the completion and integration of the Assistance Animal National Principles when they become available.

Recommendation 15: PWDA recommends that regulations require airlines:

- ask for the same information about 'dangerous goods',
- provide a decision within 48 hours of an application,
- explain any rules a person needs to follow onboard when dangerous goods are carried in an accessible format, or
- if carriage is refused, provide reasons for doing so when making the decision.

Recommendation 16: PWDA recommends airlines be required to explain clearly which disability aids are allowed to travel in the cabin, their dimensions, the application process, any applicable rules, and that airlines be prevented from charging extra to carry disability aids.

Recommendation 17: PWDA recommends that airlines be required to work with their disability advisory groups to develop clear explanations, and evolve rules appropriate to carry disability aids safely onboard, and to regulate what happens when disruptions occur.

Recommendation 18: PWDA supports regulating when a person with disability must travel with a carer, requiring that the person be seated next to their carer and that carer names be allowed to be change free of charge.

Recommendation 19: PWDA recommends that airlines be required to work with their disability advisory groups to develop clear explanations, and evolve rules for situations where there is disagreement over whether a passenger can travel independently.

Recommendation 20: PWDA supports regulating when airlines to restrict when they are able to ask for medical certificates to situations where medical assistance or oxygen is needed during the flight, or the person has to travel in a stretcher or incubator.

Recommendation 21: PWDA recommends also regulating and explain clearly any other times when aviation staff may ask to see medical certificates, and situations where they must be renewed.

Recommendation 22: PWDA recommends regulating that clear information about accessibility options be made available before a person books their journey.

Recommendation 23: PWDA recommends requiring that information about airports and flight bookings be provided in accessible formats.

Recommendation 24: PWDA recommends that airlines and airports work with their disability advisory groups to ensure that communication is provided in accessible formats.

Recommendation 25: PWDA recommends regulating airlines and airports to ensure that people with disability receive timely and accessible information about flight disruptions, and what they need to do.

Recommendation 26: PWDA supports regulating to require airlines to advise people with disability about the reasons their flight has been refused, and of how to book an alternative or access a refund.

Recommendation 27: PWDA supports regulating the information provided about seating and accessibility features before a person books their travel, and that a person's request be taken into consideration.

At the Airport

Recommendation 28: PWDA recommends option 1 that allows the passenger with disability to choose when they transfer from their mobility device to the airport/ airline device, the minimization of time required to be spent in this device, and the requirement that the person not be left in an airport/airline device unattended for longer than 30 minutes.

Recommendation 29: PWDA supports regulating self check-in facilities to ensure they are accessible to people with disability.

Recommendation 30: PWDA supports requiring the installation of assistance points where people with disability can access help and accessible information.

Recommendation 31: PWDA supports government developing new standardized regulations for airport wayfinding to improve, legibility, and wayfinding accessibility, for people with disability.

Recommendation 32: PWDA supports requiring that airports/ airlines also be required to communicate any changes about departure gates or travel in the same accessible formats as for flight disruptions.

Recommendation 33: PWDA supports the development of regulations to improve access for arrivals at and departures from airports.

Recommendation 34: PWDA supports regulations that Provide clear information and priority for people with disability at security.

Recommendation 35: PWDA supports regulating to require that people with disability be involved in the co-design of accessible facilities at airports.

Recommendation 36: PWDA supports regulating to require airports and airlines are required to protect disability aids from damage and loss, and track their movement and report to the owner.

Recommendation 37: PWDA supports regulating to require that airports and airlines give passengers with disability choice about how they would like to be transferred from their own mobility aid to the airline's wheelchairs or seats, using approved equipment and staff trained in safe transfer practices.

On the Aircraft

Recommendation 38: PWDA supports regulating airports and airlines to ensure step-free access is provided consistently to board aircraft, and that people with disability have a choice about when they board and are not climbed over by other passengers.

Recommendation 39: PWDA supports regulations to store disability aids close to them inside the aircraft.

Recommendation 40: PWDA supports creating clear regulations to allow the use of disability aids on flights if it is safe to do so, about how to check whether a disability aid can be used on a flight, and that require an explanation when they cannot be used.

Recommendation 41: PWDA supports creating clear regulations requiring the return of mobility aids as soon as possible after flight arrival.

Recommendation 42: PWDA supports regulating to require that flight information be made available in accessible formats, and that if wi-fi is available and a person needs to use it for their communication device to function, they should be provided with free access.

Recommendation 43: PWDA supports creating regulations to make in-flight food and drink more accessible.

Recommendation 44: PWDA supports creating regulations to improve the accessibility of aircraft toilets within specified timeframes.

Recommendation 45: PWDA supports requiring that in-flight entertainment be made accessible.

Recommendation 46: PWDA supports requiring that aircraft have accessible passenger controls.

Recommendation 47: PWDA supports increasing the number of aircraft seats with moveable armrests across all classes of seating.

Background

Travel by air is an important way for Australians to move around the country, and across the world. For some Australians travel by air is the only practical way to access to work, education, healthcare, or to see family.

The aviation sector has unique constraints, risks issues, and challenges, compared with other transport modes. But while some countries have evolved standards, innovations, and practices to improve equitable and inclusive access, Australia has fallen behind compared to the European Union, Canada and the United States. With the implementation of these standards, the co-design partners want to see Australia to lead the world in accessibility and inclusion in aviation.

The co-design process

Co-design was used from the outset to develop the [aviation disability standards consultation paper](#), instead of people with disability being brought in to provide their input on designs developed by others, or being asked for their thoughts when it was too late to make meaningful change. People with Disability Australia (PWDA), the Australian Federation of Disability Organizations (AFDO), the Justice and Equity Centre (JEC) and the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (hereafter The Department) formed the Aviation Accessibility Steering Committee with other government members from time to time.

Disability representative organisations were able to have meaningful input into:

- shaping the work planning process,
- identifying problems that needed consideration,

- securing information and expertise from the aviation sector that was needed so people with disability could decide on the best options,
- who needed to be involved to achieve the best outcome, and
- engagement processes that reflected and valued the input of people with disability with a wide range of lived experiences, from across Australia.

Together the Steering Committee has worked to keep people with disability and the wider community informed about the co-design process and the consultation, and we have worked to ensure that the ways we send and receive communication remain inclusive and accessible.

Three co-design workshops were held with people with disability from representative organisations and some individuals who brought different lived experiences of disability and air travel from across Australia. These workshops were facilitated by people with a lived experience of disability, accessible communication and translation into Easy Read, Auslan and captioning was used in the preparation and distribution of documents and the facilitation of the workshops.

The workshops organised discussion of the aviation journey issues into:

- 1 - 'Planning and Booking Air Travel'
- 2 - 'On the Plane', and
- 3 - 'At the Airport'.

The feedback given in these workshops informed The Department's drafting of the standards.

A separate accessible consultation facilitated by a person with disability was held with young people with disability, to gather their feedback. The co-design committee felt this was a more culturally safe approach than including young people in the main consultation. A report was prepared summarising the feedback from this consultation, to ensure the perspectives of young people were also captured.

The Co-design committee worked with The Department to create guides in accessible formats to help people understand and respond to the consultation. Three information sessions were held by the Department with the co-design committee members for:

- the general community,
- Disability Representative Organisations and
- the Aviation Sector.

These sessions were also facilitated by people with disability, and Auslan translation and captioning were provided. The Department also offered to run sessions for specific groups as needed, including Australia's Disability Strategy Advisory Council.

As part of seeking to make the consultation more accessible to people who may have questions, JEC created an [Explainer](#) document. This document focused on key issues, and the most common problems faced by people with disability.

PWDA, JEC and AFDO co-hosted a session for people with disability to ask questions related to the consultation and the issues discussed in the explainer. This was a session to help answer the questions people may have about areas of the consultation, or its documents, that they did not understand. It was designed to help them prepare a submission of their own, and participants were encouraged to have their say directly.

This session ran from 4:30pm till 6pm AEST and was intended to enable greater participation from people with work or education commitments, and it was also at a more accessible time than the government session for people living in Western Australia.

The [consultation](#) enabled people to provide feedback in the widest possible range of formats including: responding to a survey, preparing and submitting a written response, a video or audio format, or by calling The Department to arrange another method.

Responding to the Consultation

In order to address the complex range of issues involved, the [consultation paper](#) has broken the air travel journey into four stages:

- Whole of Journey Options
- Planning and Booking Air Travel
- At the Airport, and
- On the Aircraft.

We have structured our responses around these stages, and we have focussed our submission on finding the best ways for the standards to give effect to:

- what workshop participants called for
- additional things the youth consultation called for
- additional things we heard from people with disability, whether at information sessions, the explainer forum or via our advocacy work
- ensuring the standards able to be implemented and evolved over time based on the feedback of people with disability, to improve the accessibility of aviation.

We have incorporated this together, rather than separating it out into what we heard, or into a discussion section.

Our submission also notes how the Aviation Disability Standards fit into, and are impacted by, the [Disability Standards for Accessible Public Transport Amendment 2026](#) and the [Aviation Consumer Ombuds Scheme](#). In the forum we held many of the things people had questions about, such as reporting, training, accountability against the standards, and the handling of disability aids, will be covered through a combination of these laws, regulations, and the standards once implemented, rather than by the Aviation Disability Transport Standards alone.

The Aviation Disability Transport Standards once implemented provide a starting point, and will need to change over time as new technology is developed. We support mechanisms that enable the standards to evolve to better meet people's needs.

PWDA recognises that people with disability have very different lived experiences, and ideas about making air travel more accessible for them. We have encouraged people to have their say directly to help shape the standards, so that they incorporate as many of the lived experiences and ideas people have as possible.

Whether to Regulate

Throughout the [Aviation disability standards consultation paper](#) The Department has proposed three options for reform:

- **Regulatory option:** airlines and airports would be required to comply with new laws (regulations)
- **A non-regulatory option:** the government would issue best practice guidance to airlines and airports to support people with disability in navigating their aviation journey. Airlines and airports would be encouraged to follow this guidance, but it would not be mandatory.
- **Maintain existing practice**, there would be no change – no new legislation or guidance would be issued by government.

PWDA calls for the regulatory option to be applied to all of the journey stages. Existing practices are clearly not working for people with disability, and we have heard this consistently during the workshops, consultation information sessions, the forum and from our members. Stories of poor aviation experiences and barriers to travel regularly feature in the media, and people with disability report repeated instances that reflect a lack of improvement over time.

The non-regulatory option fails to provide consistency, which was consistently called for in the workshops. People with disability will be unable to anticipate which airlines and airports will, or will not, follow the guidance and to what extent.

Without consistently applied regulations, airlines and airports who follow the guidance may also be at a competitive and commercial disadvantage compared with those that do not. Consistent regulations that apply to everyone provide the best outcomes for people with disability, and the aviation industry. They also provide an incentive to innovate and improve to meet the standards.

Recommendation 1: Apply the regulatory approach to all standards covered by the consultation paper, rather than allowing standards to be optional.

Timing to Implement Regulations

Passing Aviation Disability Standards is only the beginning of a journey to achieve change. It will be necessary to write regulations to give effect to the standards, and to plan for the timescales needed to deliver the changes people have called for. In our meetings with the aviation industry, we have learnt that changing some things like the fit-out of an aircraft can take many years due to safety testing requirements.

However, other things like staff training, adding a tactile map of the bathroom, or providing communication about the journey in accessible formats, should be able to be rolled out more quickly. It may be necessary in drafting to ensure the elements are broken down so that compliance can be achieved and recognized on as many of the more straightforward items as possible.

As the regulations are drafted PWDA recommends providing timeframes for completion, requiring reporting against these, and providing an explanation where it is expected that something will take more than 2 years to change.

Recommendation 2: when regulating to achieve the standards, provide timeframes for completion, a requirement to report progress and an accessible explanation for things expected to take more than 2 years to achieve

1. Whole of Journey Options

Options for new standards

1. Set out the roles and responsibilities of airports and airlines

It can be unclear whether an airline or airport is responsible for providing assistance to passengers with disability. The [consultation paper](#) proposes 3 options to address this:

- Airports and airlines share responsibility:
- Airports would be responsible for helping a person with disability from arrival to check-in.
- Airlines would be responsible for check-in, in the airport after check-in, getting on and off the aircraft, flight transfers and through to baggage claim or customs clearance.
- Airports would be responsible for the entire journey through an airport, up to boarding and disembarking.
- Airlines would be responsible for assisting people with disability through the entire journey from arriving at the airport through to leaving the destination airport.

Co-design workshop participants want consistent, seamless accessibility services in all airports and clear accessible format communication about who will provide them. Participants in the information sessions and the forum hosted by PWDA also emphasised the need for consistent accessibility and communication.

In both the workshops and the forum hosted by PWDA, people with disability called for assistance to be available from airport entry points such as curb side drop-off zones or public transport stops to get to check-in. They suggested a creating a booking service to facilitate this.

In workshops, information sessions and the forum, people with disability repeatedly raised the issue that when assistance is provided it takes them straight to the gate and leaves

them. The lack of assistance to access bathroom facilities or be transported to where they can buy food were both raised. We also heard about people being unable to access assistance to reach connecting flights, especially when they needed to fly on different airlines to complete their journey.

Australia's airports differ in size and resources. In smaller airports staffing of check-in may be carried out entirely by flight staff who arrive on the plane and then leave with it once passengers have boarded. This means that if a flight is unable to land, and passengers are waiting for it, there will be no airline staff to tell them what is going on or to help them make alternative arrangements. This is likely to impact small first nations communities in regional and remote areas.

Airline staff and companies generally have no control over many elements that contribute to the barriers and issues workshop participants raised with airport infrastructure, such as ramps, elevators, bathrooms, assistance animal relief areas, announcements, information displays, wayfinding, assistance between terminals, aerobridge availability, the location of parking, taxi and rideshare access points. Only airports are able to apply for government grants to make improvements to accessibility.

For these reasons PWDA prefers option two where airports would be responsible for the entire journey through an airport up to boarding and disembarking. The responsibility for in-flight experience, flight booking, and the management of customer profiles will remain with airline, and the regulations need to ensure that airlines provide airports with the information they need to assist passengers safely and effectively.

Recommendation 3: Airports should be responsible for the entire journey through the airport up to boarding and disembarking, and airlines should be responsible for booking, information management and the in-flight experience.

2. Make sure staff are trained to support people with disability

The consultation paper suggests expanding incoming reforms to the [Disability Standards for Accessible Public Transport 2002 \(DSAPT 2026\)](#) to include aviation-specific training outcomes. The [DSAPT reforms](#) require that operators or providers provide staff with

disability awareness/disability-affirming training tailored to their roles, to prevent disability discrimination, with annual refresher training.

Additional [requirements proposed for aviation](#) include:

- Staff who transfer people with disability from a mobility device or seat would be trained to ensure the transfer is safe and dignified
- Staff handling mobility aids would be trained in identifying, moving, disassembling and reassembling them
- Airlines and airports would also be required to provide information about their training programs to a member of the public on request, including who has provided the training, whether it was developed in consultation with or co-designed and facilitated by people with disability, and the training outcomes
- Requiring staff competency assessments, that include disability-affirming communication.

PWDA supports the provision of this training, however workshop participants highlighted issues with the booking, security screening and onboard experience that went beyond safe transfers and the handling of mobility aids. Across the information sessions, forum and youth consultation we have heard accounts of:

- people being separated from assistive technology or assistance animals that they need in order to proceed through security
- embarrassing demands for extra searches, disclosures about prosthesis or medical devices in public
- people being separated from the person who they need to support their communication with staff, including through translation or other necessary supports
- people being required to do things they are unable to do, such as remove their shoes when there was no available chair to sit down and they were unable to balance

- security staff not listening to and actively trying to understand a person's disability and causing stress that triggered their condition, leading them to be placed on a suspicious fly list.

During the co-design process we heard that security screening processes need to remain confidential to be effective. However, requiring all security staff and contractors to undertake relevant disability awareness/disability-affirming training does not require the disclosure of security related elements, nor does undermine efforts to ensure safe and secure screening processes.

We also heard repeatedly how important it was that training is co-designed, facilitated and delivered by people with disability. Training must require all staff to seek the advice of the person with disability on the safest transfer choices and ways to handle, assemble and disassemble assistance equipment.

For this reason, PWDA recommends that all aviation staff and contractors be required to complete disability awareness/disability-affirming training related to their role, that is co-designed, facilitated and delivered by people with disability. We also discuss security screening in chapter 3.

Recommendation 4: PWDA supports additional training requirements related to safe transfers and the handling of assistance equipment, and we call for all aviation staff and contractors, including security, to receive disability awareness training appropriate to their role that is co-designed and delivered by people with disability.

3. Set up disability reference groups

To include people with disability in the development of aviation policies and processes, the consultation paper proposes:

- Airports and airlines with a certain number of passengers each year would need to set up a disability reference group.

- The group would need to be consulted about any significant changes that may impact the experience of a person with disability.

Working group participants were clear that all airlines and airports need a disability reference group. This was also raised in information sessions and the forum, and some participants also called for this work to be paid.

The requirement must not be removed for smaller airports, as we heard that these are often the places people with disability depend on most. If it is not possible to convene a group for every small airport, then a disability reference group should be established for all of the smaller airports in a state or region.

It is important that disability reference groups represent key travel cohorts with disability, and that First Nations specific representation be included that is relevant to the community an airport is located in.

Recommendation 5: Every Airline and Airport should have a disability reference group, who must be consulted about significant changes that may impact the experience of people with disability. Airports with smaller numbers of customers must still be represented but may have the option of appointing a shared disability reference group for smaller airports within a state or region. Representation must include First Nations people with disability from communities where airports are located.

4. Report on how standards are being met

The [DSAPT reforms](#) do not make reporting compulsory, but instead the government is developing a ‘non-mandatory reporting framework’ to help improve data collection and reporting. The lack of compulsion was a source of disappointment for PWDA as our work on the standards with many people with disability and their representatives consistently raised the issue of transport providers who had opted out of their responsibilities.

PWDA supports development by the government of a reporting framework for the [DSAPT reforms](#) applicable to aviation. We also support making it mandatory that all airlines and airports would publish each year:

- the number of mobility aids that are damaged or lost by the airline
- staff training and refresher training hours, and training outcomes
- how often and why passengers with disability are refused or have their air travel delayed
- the number of assistance animals refused carriage
- the number of complaints of injury and/or disability discrimination

We also think reporting requirements for lost or damaged mobility aids and for complaints of injury or disability discrimination should be extended to airports and all aviation staff.

At the forum PWDA hosted, we heard from assistance animal handlers who were unable to have animals accredited to fly because they were unable to participate in the on-aircraft-training necessary to achieve accreditation. Accordingly, we believe assistance animal reporting must also include the reasons for refusal.

We support requiring that all airlines and airports report annually how they are complying with the aviation disability standards. Rather than exempt airlines or airports with fewer than 150,000 passenger movements per year, they should still be required to provide the data for government to produce the report. Not only would this reduce the burden on smaller operators, data collection and reporting can help smaller airports make their case for government grants to improve accessibility.

During work on reporting for the DSAPT reforms a range of sensible proposals were made that could apply to aviation including:

- Auditing one vehicle example to represent a fleet, where all vehicles are the same, or one design example where all others are the same (e.g. an airplane seat or console design)
- Taking more than one year to complete the first audit and report, owing to the size and scale required

- Inviting the disability reference group to help set the priorities for audit and reporting

Transitioning to reporting could also be supported through the government providing templates, especially for smaller airports. Creating audit templates could also enable the training of people with disability to develop professional careers providing audit and reporting services.

Recommendation 6: PWDA recommends annual reporting by the aviation industry on how they are complying with the aviation standards, after an initial audit period of 2 years to generate the first report

Recommendation 7: PWDA recommends the government create audit and reporting templates to help smaller airlines and airports, rather than exempting them, and to support the creation of auditing jobs for people with disability

Recommendation 8: PWDA recommends inviting disability reference groups to help set the priorities for audit and reporting

2. Planning and Booking Air Travel

In workshops, information sessions, and the youth focus group, people with disability raised lots of issues about planning and booking air travel including the need for:

- Clear, accessible, communication about the flight, accessibility, infrastructure and services to enable them to plan and book their travel
- Communication in accessible formats, including written material, plain language or translation
- Telephone booking options that do not disadvantage them by only being available at limited times, not offering sale prices, or that involve being passed between people and having information lost in the process
- More accurate information about requirements, such as the dimension and weight limits for assistive technologies

- Better support to make a booking, including a contact number to request or confirm information
- Measures to address barriers like not knowing the name of the support person at the time travel is booked, or the need for expensive supporting documentation
- Greater consistency between the booking process, what is actually required and between the rules applied on different flights

This is not an exhaustive list of the challenges people face. Through the co-design workshops, people with disability made suggestions to improve this process that led to the 14 recommendations in this chapter.

1. Offer passenger assistance profiles

With passenger consent, airlines could store the accessibility needs of a person with disability in a 'passenger assistance profile'. A person could include their seating preference, communication needs, information about medical equipment, disability aids, assistance animals, any carer travelling with them and any permits or certificates. This would mean the person does not need to provide the information again for future bookings.

PWDA agrees that this could improve the experience of flying for passengers with disability, and reduce the burden people currently face. When the regulations are written they also need to regulate how information is stored, shared and updated, to ensure that profiles are effective and the information is used appropriately. Regulations also need to cover how profile information is shared between different airlines, airlines and airports, and other aviation staff that need information to support the person's journey.

Recommendation 9: PWDA supports offering passenger assistance profiles

2. Clarify times when limits on passengers requiring assistance may apply

Some airlines limit the number of passengers with disability who need wheelchair assistance with boarding or exiting the aircraft. This is sometimes called the 'two-

wheelchair-policy', and it can lead to passengers being refused travel on their chosen flight. Co-design workshop participants want this limit removed.

The proposal was for airlines to only be allowed to limit the number of passengers who require assistance to board or disembark where there is a 'significant safety or operational issue'.

PWDA agrees that the safety of passengers must always be the first priority. This was strongly supported in the co-design workshops, with participants wanting to be sure they could evacuate the aircraft safely in an emergency.

We also agree with the Justice and Equity Centre that allowing any 'operational issue' to be the excuse for the limit, is likely to mean the prohibition continues.

The steering committee was able to see some of the different ways wheelchairs are loaded and stored to keep them safe. A good operational reason for placing a limit on some smaller aircraft might be because it can only fit 2 wheelchairs in the designated hold area where they are stored to keep them safe from other baggage damaging them. Operational issues like departure timing or profit should not be used to impose limits, and the regulations should specify this.

Recommendation 10: If airlines limit the number of passengers on a flight who require assistance to board and disembark, the limit for that flight must be published at the time a passenger books. If it is for any reason other than safety, the reasons must also be published.

3. Services must be provided when passengers give advance notice of their accessibility needs

Co-design participants wanted to be sure that if they notified an airline of their assistance requirements, they would actually get them. They wanted a clear, accessible, consistent process for providing this information.

The proposal is that if a person with disability informs the airline of the services they will need at least 48 hours before the flight departure time, the airline/airport would need to provide that service.

Airlines would also need to provide written confirmation of the services that will be provided.

If 48 hours' advance notice is not provided, airlines/airports must make every reasonable effort to provide the service requested by a person with disability.

We agree with the [Justice and Equity Centre](#) that 'every reasonable effort' is too vague. People could be left stranded if a flight is cancelled, because they are unable to provide 48 hours' notice. Instead refusing the service should only be allowed for the kinds of safety and operational reasons in section 2 above.

Recommendation 11: If a person informs the airline of the assistance services they require:

- at least 48 hours before departure, then the airline/ airport must provide that service and confirm with the person in writing
- less than 48 hours before departure, then airlines may only decline to provide the service for safety and genuine operational reasons, which must be published.

4. Make sure people with disability access the same fare regardless of the method of booking

Co-design participants raised the issue of being made to book by telephone with airlines if they had accessibility needs, and being charged higher fares. They wanted to be able to use the website if they chose to, and to be able to access sales like other customers.

The [DSAPT reforms](#) once passed will require that if the standard method of payment is not accessible to a person with disability, an alternative method must be provided which facilitates independent access and does not result in the person paying more than if they

used the standard method of payment. This is not quite the same as providing the same sales or discounts regardless of the method a person with disability uses to book

The proposal is that:

- People with disability would not be required to book via phone with airlines.
- People with disability would not be charged extra for booking through different means. For example in-person, online or over the phone.

This standard does not apply to travel agents.

Recommendation 12: People with disability must not be required by airlines to book over the phone, and must be able to access the same fares as other customers regardless of the method of booking.

Making approval processes clearer

5. Clarify rules for carriage of assistance animals on aircraft

Co-design workshop participants and attendees at the forum hosted by PWDA raised lots of issues about the carriage of assistance animals.

Co-design participants wanted greater clarity and consistency is needed on carriage of trained assistance animals by airlines and airports, including timeframes for the animal to be granted approval to fly in the cabin with their handler. Forum participants raised the issue of refusal for an animal being trained to provide assistance, as some airlines only accept accredited animals, but to become accredited an animal need flight training.

There has also been a case in the media of a person being [ejected form a flight](#) because the rule about where lithium batteries must be stored came into conflict with where the assistance animal needed to travel.

Like many other organisations PWDA provided a [submission](#) to the draft Assistance Animal National Principles to improve consistency in regulation throughout Australia. There is an urgent need for nationally consistent principles to help the aviation industry

identify a qualified assistance animal, for regulations related to how an animal becomes qualified to fly. More work may also be needed about specific aviation requirements that may conflict with the needs of an assistance animal to travel safely.

The proposal is that:

- Airlines would need to make it clear how a passenger with disability can apply to bring their assistance animal with them on an aircraft and have a set timeframe to process those requests (we support up to 48 hours).
- Airlines would need to inform people in an accessible format whether or not their assistance animal has been approved for travel.
- For domestic flights, airlines cannot require a person travelling with an approved assistance animal to use in-person check in.
- Airlines may require animal handlers to bring animal relief accessories for long-haul flights, and airlines would need to provide ways for the handler to dispose of soiled items.
- Airlines would need to transport the assistance animals in the aircraft cabin with their handler.

Recommendation 13: PWDA supports the proposed regulations for seeking approval to fly with an assistance animal, for check-in, the carriage of the animal in the cabin and for relief accessories.

Recommendation 14: We call for the completion and integration of the Assistance Animal National Principles when they become available.

6. Explain how passengers can get approval for equipment classed as dangerous goods

Some people with disability need to travel with disability aids or equipment that are classed as dangerous goods, and co-design workshop participants shared accounts of different information being required by different airlines, and different rules being imposed.

The proposal is that:

- All airlines would need to ask for the same information about disability aids that are classified as ‘dangerous goods’, for example, wheelchair batteries, for consistency across all airlines.
- Airlines would need to tell the person with disability if their equipment can go on the aircraft within 48 hours of the application.

PWDA supports regulation in line with the proposal, but also calls for airlines to also provide an explanation of any rules about how wheelchair batteries or other dangerous goods are to be carried, so it is clear what a person will need to do when they fly. If an airline rejects a person’s application to fly with their equipment, they must provide the reason.

Recommendation 15: PWDA recommends that regulations require airlines:

- ask for the same information about ‘dangerous goods’,
- provide a decision within 48 hours of an application,
- explain any rules a person needs to follow onboard when dangerous goods are carried in an accessible format, or
- if carriage is refused, provide reasons for doing so when making the decision.

7. Ensure disability aids can be transported for free and in-cabin, where possible

Co-design workshop participants shared accounts of refusal to allow a person to travel with a disability aid in the cabin, of extra charges, and different rules being applied. There is also the issue when a flight is disrupted, and a person needs access to their checked in disability aid. Youth consultation participants also raised the issue of rules not being explained clearly. They also explained that some technology like glucose monitors to have connectivity to Wi-Fi and Bluetooth to operate, and this does not work in flight mode.

The proposal is that:

- Disability aids and medical equipment would not be counted as part of a passenger's baggage allowance and must be transported without extra charges.
- Airlines would need to make it clear which disability aids are allowed on flights, including the size and weight the aids must be to travel in-cabin, and any approval process to carry disability aids.

PWDA supports these recommendations, but recognizes that the different sizes and shapes of aircraft may lead to differences, and some technologies may need different rules. This is an area where airlines should work with their disability advisory group to develop clear explanations, and these should then be included in staff training.

Recommendation 16: PWDA recommends airlines be required to explain clearly which disability aids are allowed to travel in the cabin, their dimensions, the application process, any applicable rules, and that airlines be prevented from charging extra to carry disability aids.

Recommendation 17: PWDA recommends that airlines be required to work with their disability advisory groups to develop clear explanations, and evolve rules appropriate to carry disability aids safely onboard, and to regulate what happens when disruptions occur.

8. Explain requirements for carers or companions travelling with a person with disability

Co-design workshop participants, information session and forum participants raised issues around travelling with a carer. Some people called for carers to travel for free or at discounted rates, but these standards do not regulate how airlines charge for carers.

The proposal is that:

- Airlines cannot require a person with a disability to travel with a carer unless the person is unable to travel independently.

- If a person with disability is travelling with a carer, the carer must be seated next to the passenger with disability.
- Airlines must allow free changes to personal details like names of the carer or companion up to an hour before departure for domestic flights and 3 hours before international flights.

PWDA supports the proposal, but this may not be enough to address situations raised during the workshops where a person argues they can travel independently, but the airline says they cannot. Regulations may need to describe clearly the things a person needs to be able to do by themselves to travel independently, to reduce uncertainty.

Recommendation 18: PWDA supports regulating when a person with disability must travel with a carer, requiring that the person be seated next to their carer and that carer names be allowed to be change free of charge.

Recommendation 19: PWDA recommends that airlines be required to work with their disability advisory groups to develop clear explanations, and evolve rules for situations where there is disagreement over whether a passenger can travel independently.

9. Clarify when airlines can ask for medical certificates

Co-design workshop participants raised issues related to situations where they were required to provide medical certificates. People also raised the issue of being asked for medical evidence during the screening process. Youth consultation participants also raised the issue of the expense of providing supporting documentation. Requiring a person to provide additional medical certificates about a condition that does not change would also add to this expense.

It is proposed that:

Airlines would only be able to ask for medical certificates from a person with a disability where the person:

- has a condition that means the person cannot fly safely without needing medical assistance
- needs medical oxygen during a flight
- is traveling in a stretcher or incubator.

Recommendation 20: PWDA supports regulating when airlines to restrict when they are able to ask for medical certificates to situations where medical assistance or oxygen is needed during the flight, or the person has to travel via stretcher or incubator.

Recommendation 21: PWDA recommends also regulating and explain clearly any other times when aviation staff may ask to see medical certificates, and situations where they must be renewed.

Make information easy for people with disability to access and understand

10. Provide clear information about accessibility options before booking

People in both the co-design forums and youth consultation called for accessibility information to be made available at the point of booking. Airlines and airports would need to provide clear information about how accessible their infrastructure or services are for people with disability.

For example:

- maximum weight, dimensions, and numbers, mobility aids that each aircraft can transport in the cabin
- the maximum weight, dimension and number of wheelchairs able to be safely stowed on each aircraft type
- detailed airport wayfinding information

- critical safety rules regarding the air transport of equipment classed as dangerous goods
- information about any booking restrictions, such as those for exit row seating, with an explanation about why these restrictions are in place
- information about equipment available to make flights and airports accessible (for example, availability of Eagle lift, slide boards, wheelchairs, accessible toilets/adult change rooms)
- information about services available onboard the aircraft (for example, assistance with stowage of carry-on baggage, opening food and drink packaging)
- information about the use of on-board disability supports (for example, harnesses), including disability supports provided by the airline, and what supports a person with disability may bring
- information about accessible seat amenities and entertainment options
- requirements for passengers travelling with assistance animals and carers as outlined previously

Regulating to require that accessibility information needs to be provided before booking creates an imperative for airlines and airports to work together, to share information that people with disability need to plan their journeys.

Recommendation 22: PWDA recommends regulating that clear information about accessibility options be made available before a person books their journey.

11. Offer information needed for flight bookings in multiple accessible formats

Co-design working group and youth consultation participants called for information about flight bookings and airports to be available in accessible formats. This included digital information, but some youth workshop participants also wanted accessible printed information too.

Some of the discussions highlighted how travel or ticketing conditions written in complex language or ‘fine print’ can be difficult to read and understand. The issue of online ticketing purchase processes ‘timing out’ when a person needed to access more information about accessibility, or to use tools to make reading websites more accessible.

It is proposed that:

- Airlines and airports would need to provide information in a range of accessible formats to meet the different needs of people with disability.
- For example:
 - Auslan translations or the availability of Auslan interpreters
 - Easy Read
 - Braille
 - pictorials and social stories
 - web pages to have an ‘accessible mode’ when booking flights.

Recommendation 23: PWDA recommends requiring that information about airports and flight bookings be provided in accessible formats.

Recommendation 24: PWDA recommends that airlines and airports work with their disability advisory groups to ensure that communication is provided in accessible formats.

12. Provide communication in accessible formats during disruptions

One of the most concerning things for people with disability was what happens when a flight is disrupted or cancelled.

The [DSAPT reforms](#) will require that information about the disruption and alternative travel options in a variety of formats and with as much notice as possible. If this is not possible, information must be provided by direct assistance. This does not apply when a disruption is outside the operator or provider’s control. The difficulty with this is that storms and

conflict issues are outside an operators control, but people with disability still need to know what is happening.

The [Aviation Consumer Ombuds Scheme](#) and the [Aviation Customer Rights Charter](#) when implemented will outline minimum customer service levels customers can expect during flight disruption. In addition to these requirements it is proposed that:

- Airlines would need to inform people with disability about any changes or disruptions to their flight plans in an accessible format as soon as possible. This must include informing passengers who are deaf/blind in a format accessible to them.
- This includes:
 - whether flight changes will impact the airline's ability to transport the passenger or their mobility device
 - other travel options available if the changes impact the passenger's accessibility needs (for example, the aircraft cannot carry their mobility device)
 - how to get assistance to rebook or manage the change to flight.

Recommendation 25: PWDA recommends regulating airlines and airports to ensure that people with disability receive timely and accessible information about flight disruptions, and what they need to do.

13. Communicate when passengers with disability or their disability aids are not accepted for travel

Co-design participants wanted clearer, transparent and accessibly provided communication about the reasons for flight refusals. Some of the issues raised by the aviation industry that have contributed to this include inaccurate information being provided via travel agents about disability aids, or conditions like storms or high winds preventing the use of lifts needed to board passengers with limited mobility. Regulation

creates an imperative for all parts of the aviation sector to work together to improve communication. Communication must be verbal and in writing, in a format accessible to the passenger.

It is proposed that:

- Airlines would need to inform people with disability why they, or their disability aid, have been refused travel
- Airlines would also need to advise the person:
 - of other flight options that could carry their disability aid to the same destination
 - offer to book them in for the same or less cost as their original flight, or
 - provide a refund if another flight is not possible.

Recommendation 26: PWDA supports regulating to require airlines to advise people with disability about the reasons their flight has been refused, and of how to book an alternative or access a refund.

14. Allow people with disability to choose seats that best meet their needs

Co-design workshop participants raised issues around seat selection including: not being seated where they chose, operators placing them in seats that meant other passengers climbed over them, seats in some areas of the plane like business having fixed arm rests that made them inaccessible. They suggested setting aside some seating with accessibility features for priority booking by people with disability.

The DSAPT reforms will require that passengers with disability be able to book seats that are located in parts of the conveyance that are appropriate for their travelling needs (unless they are already booked) and that if there are different classes of travel there must be seats appropriate to the travelling needs of people with disability in each class.

It is proposed that:

- before assigning a passenger seat to a person with a disability, airlines inform the person of the passenger seats that are available in the class of service that the person has requested and that have equipment and facilities that best meet the accessibility needs of that person, such as a wheelchair-accessible toilet or a passenger seat that has additional leg room, a larger seat pitch or movable armrests; and
- in assigning a passenger seat or cabin to a person with a disability, take into account the person's opinion with respect to which seats or cabins would best meet the accessibility needs of that person.

Recommendation 27: PWDA supports regulating the information provided about seating and accessibility features before a person books their travel, and that a person's request be taken into consideration.

3. At the Airport

People with disability in co-design workshops and the youth forum identified many areas where the airport journey experience could be improved. This included: wayfinding and signage, improved navigation for people with vision loss, the provision of assistance animal relief areas before and after security, better signage for ramps and elevators, sensory maps of airports, social stories about what happens in airports.

Youth consultation and forum participants called for better awareness of the Hidden Disabilities Sunflower program, as people with good awareness were generally more accommodating than those who were unaware of it.

The issue of navigating security by people who are blind or deaf-blind was raised, because people cannot perceive where security gates are, where to place their feet or how to stand. They reported being shouted at or grabbed. Providing a tactile map and describing how many steps to take to reach the scanner could be a much better approach.

Make it easier for people with disability to move around the airport independently

1. Allow people with disability to stay in their mobility device as long as possible

People who use mobility assistance devices wanted to stay in their own device for as long as possible, because airport and airline chairs are uncomfortable and can cause injury.

PWDA

Under Option 1 It is proposed that:

Airlines/ airports allow passengers travelling with a mobility device to remain with that device up to a certain time (for example, 30 minutes before gates close) and the passenger can choose whether to hand over their personal mobility device at check-in, the departure gate, or tarmac so long as it is within the stipulated time period.

Where a passenger with disability has transferred out of their mobility device, airline or airport staff would need to accompany that person and not leave them unattended for long periods of time (for example, longer than 30 minutes).

PWDA does not support the second option that would allow airlines to use 'operational requirements' as a reason to require passengers to transfer from their mobility device earlier.

Recommendation 28: PWDA recommends option 1 that allows the passenger with disability to choose when they transfer from their mobility device to the airport/ airline device, the minimization to time required to be spent in this device, and the requirement that the person not be left in an airport/airline device unattended for longer than 30 minutes.

2. Provide accessible check-in facilities

As airports move towards more self check-in, co-design participants called for these facilities to be accessible. Currently only 5% of information desks and check-in counters must be accessible, but people with disability are nearly 25% of the population.

It is recommended that:

If any self-service check-in facilities are provided, for example kiosks and bag drops, airlines and airports would need to make sure they are accessible to people with disability.

Recommendation 29: PWDA supports regulating self check-in facilities to ensure they are accessible to people with disability.

3. Install points throughout the airport where people can ask for assistance

Co-design workshop participants called for information points and places to request assistance, to help them navigate the airport.

It is proposed that:

- Airports with a certain number of passengers in a year would need to have assistance points throughout the airport, where people with disability can ask for assistance. The assistance point could be a staffed desk or a call button.
- The assistance points would also have priority seating for people with disability.

Recommendation 30: PWDA supports requiring the installation of assistance points where people with disability can access help and accessible information.

4. Make wayfinding around airports consistent and accessible

Co-design workshop and youth forum participants raised the need for better, more consistent wayfinding in airports. People who are blind or have low vision said they often had difficulty navigating to check-in from where they arrived at the airport, and any Australian airports do not use tactiles that train, tram and bus stations provide.

Co-design workshop participants proposed that new standards be developed for airports that:

- require consistent signage, colours, and symbols across airports
- have large print, high contrast and tactile formats

- require airports to provide GPS-style navigation apps and static “you are here” maps throughout the premises.

PWDA prefers Option 1 where the Australian Government would work with the aviation industry, people with disability, the Australian Human Rights Commission to identify and standardize signage requirements. Even a single journey involves at least 2 airports, and inconsistent wayfinding standards makes it difficult for people to navigate.

Recommendation 31: PWDA supports government developing new standardized regulations for airport wayfinding to improve, legibility, and wayfinding accessibility, for people with disability.

5. Provide information about travel changes and disruptions in accessible formats

Further to the booking requirement to communicate in accessible formats during disruptions, people with disability also need accessible communication about changes to departure gates or other travel details.

It is proposed that:

Airlines and airports would need to inform people about any gate changes, other changes or disruptions in a range of accessible formats. For example, voice to text systems or notifications that are compatible with screen readers.

Recommendation 32: PWDA supports requiring that airports/ airlines also be required to communicate any changes about departure gates or travel in the same accessible formats as for flight disruptions.

Ensure a dignified travel experience for people with disability at the airport

6. Improve access for arrivals at and departures from airports

The Co-design Committee saw good examples of things airports were doing to improve access for people at arrivals and departures. This included an airport that had created accessible short-term drop-off bays to allow a driver, friend or family member to take a

person with their luggage into the airport without that person being penalized for leaving the vehicle to provide assistance.

Co-design workshop participants wanted:

- More accessible parking bays near kerbside drop-off zones, with ramp access, protection from the weather and clear signage, accessible for taxis, point-to-point, pre-booked and chauffer driven vehicles
- Disability parking permits to be recognised consistently across airports, including within pick-up zones at destination airports
- A minimum number of accessible parking, drop-off and pick-up zones on airport premises which are proportionate to the passenger flow through the airport
- A designated area outside the airport terminal with free short-term parking for people with disability to safely access the terminal.
- Greater assistance when arriving and exiting the airport, including baggage claim, transfers to taxis/public transport, and connections.

Recommendation 33: PWDA supports the development of regulations to improve access for arrivals at and departures from airports.

7. Provide clear information and priority for people with disability at security

Co-design workshop participants called for improvements in security screening and information about it. In addition to the training of staff already discussed, it is proposed that:

- Airports with more than one security screening machine would need to have at least one priority security screening lane that people with disability can choose to use.
- Security screening staff would need to be comprehensively trained in disability awareness and disability-affirming communication.

- Security screening staff should be able to provide clear verbal, visual and tactile instructions to guide a person with disability through the security screening process.

Recommendation 34: PWDA supports regulations that Provide clear information and priority for people with disability at security.

8. Involve people with disability when designing accessible facilities at airports

Co-design workshop participants wanted airports and airlines to involve people with disability in designing facilities or making changes. Existing premises standards such as the National Construction Code, Disability (Access to Premises – Buildings) Standards 2010 and Disability Standards for Accessible Public Transport Standards 2002 cover some of the issues people raised but some things were aviation specific including:

- accessible toilets at multiple points, such as before security screening and close to gates
- private spaces for wheelchair transfers (into airline wheelchairs)
- quiet rooms and sensory spaces (both airside and landside)
- assistance animal toileting facilities, co-located near regular toilets at both arrivals and departures
- additional and larger passenger lifts.

PWDA supports requiring the end users of the accessible facilities or their representatives be involved in the co-design. For instance, assistance animal relief facilities must be co-designed with animal handlers.

In co-design processes, airports and airlines would need to consider:

- the safety of users
- the ease of finding facilities
- the optimal number of these facilities, with consideration to the size of the airport

- convenience, with minimal walking/travelling distance, as far as reasonably practical
- access for as many travellers as possible – both arriving and departing
- proximity to other airport services. For example, location of quiet rooms in proximity to security screening.

Best practice examples would be provided in the Guidelines to assist with the design of accessible facilities not already covered by the National Construction Code and the Premises Standards Access Code, such as assistance animal toileting facilities and sensory rooms.

Recommendation 35: PWDA supports regulating to require that people with disability be involved in the co-design of accessible facilities at airports.

9. Protect disability aids from damage and loss, and track their movement

People with disability have raised many instances of damage to or the loss of disability aids. In addition to earlier discussions of reporting, and carrying aids in the cabin where possible, co-design workshop participants wanted airports and airlines to be required to report on the loss and damage of devices.

A forum participant also recommended that people with disability be provided with a number to call when they booked an aid in, so that if they could call it and get faster action if they noticed it being sent somewhere else or mishandled.

It is proposed that:

- airlines/ airports ensure through equipment, processes and appropriate training that disability aids loaded and transported as cargo are stored and secured to prevent damage. This may include measures such as custom containers and secure tie down systems for mobility devices such as wheelchairs.
- once a disability aid has been transferred to an airlines' custody, the airline must provide a way for a person with disability to track the location of their disability aid

that is updated in a timely manner. This could include real time notifications via SMS, email, or a mobile app.

Recommendation 36: PWDA supports regulating to require airports and airlines are required to protect disability aids from damage and loss, and track their movement and report to the owner.

10. Provide choice for passenger transfer to airline wheelchairs and seats

Co-design workshop participants raised the lack of safe transfer equipment that was suitable for them and available, and the failure of some aviation staff to listen and follow the direction of the person about how they needed to be transferred. We heard accounts of unsafe transfers, that caused pain and discomfort. Participants wanted airports to invest in assistive technology such as mechanical hoists, which can improve access and safety, and they wanted them made available at every gate.

It is proposed that airports and airlines would need to give people with disability choice about how they would like to be transferred from their own mobility aid to the airline's wheelchairs or seats.

Recommendation 37: PWDA supports regulating to require that airports and airlines give passengers with disability choice about how they would like to be transferred from their own mobility aid to the airline's wheelchairs or seats, using approved equipment and staff trained in safe transfer practices.

4. On the Aircraft

Improve the boarding and exiting experience

1. Make it easier for people with disability to board and leave the aircraft

Co-design participants wanted safe equipment and facilities for step-free boarding provided consistently and called for every gate without aerobridge facilities to have a Passenger Assistive Device lift. This is particularly relevant at regional and small airports.

The co-design committee visited Coolangatta Airport where a mobile ‘switch-back’ style ramp could be used to provide step free access to aircraft. In the Wagga Wagga airport report submitted to the co-design committee by PWDA Co-Chair Bastien Wallace a good regional example of a sloping ramp was featured that better suited a smaller aircraft. However, when boarding and disembarking that aircraft in Sydney airport step free access was not offered. Passengers need greater access to step-free solutions for smaller aircraft, including Disabled Person Lifts and ramps where appropriate.

Co-design workshop participants also wanted priority boarding and disembarking for passengers with disability, and for a choice for boarding times to be offered so that those who may need extra time or space can choose to board early.

It is proposed that:

- Airports and airlines would need to ensure that there is step-free access when boarding the aircraft. Where there is a gap or a rise, they must help a person with disability to navigate this safely.
- Airlines must let a person with disability choose when they board or disembark, unless that person needs staff assistance to board or disembark.
- People with disability who have pre-boarded should not be climbed over by other passengers to access their seats.

Recommendation 38: PWDA supports regulating airports and airlines to ensure step-free access is provided consistently to board aircraft, and that people with disability have a choice about when they board and are not climbed over by other passengers.

Treat disability aids safely and respectfully

2. Support passengers to store disability aids inside the cabin

Passengers may need to travel with disability aids that they need to access during the flight to assist with movement, breathing or other health and wellbeing issues. Some passengers with mobility disabilities may consider their mobility/disability aid to be an

extension of their body, and consent should be required before mobility/disability aids are moved or handled. Co-design workshop participants need the Aviation disability standards to go further than the Transport Standards and require that where possible, disability aids should be stored in proximity to the passenger.

It is proposed that:

- Airline cabin crew would need to help people with disability to stow and retrieve their disability aids if asked.
- Passengers with disability aids can choose to pre-board to be able to have priority access to cabin storage.
- Airlines must have space on board to fit at least one typical adult-sized manual wheelchair.

Recommendation 39: PWDA supports regulations to store disability aids close to them inside the aircraft.

3. Allow people to use their disability aids onboard, where possible

Co-design workshop participants repeatedly raised the need for clear, consistent, and accessible information about using disability aids onboard the aircraft. Rules can differ between flights and airlines, creating uncertainty. Youth forum participants raised the need for wi-fi and Bluetooth access to enable some aids like glucose monitors to work, and that requiring flight mode stops them functioning.

The aviation industry advised that some items, particularly those that interact with existing design features such as seatbelts or seating structures, require a safety assessment prior to approval, to ensure they do not compromise critical safety features.

It is proposed that:

- People with disability would be allowed to use their disability aids in flight if safe to do so.

- Airlines would need to clearly explain why sometimes disability aids cannot be used in flight because of safety risks, for example during turbulence.
- Airlines would need to be clear how people with disability can check if their disability aids can be used on flights before their travel.

Recommendation 40: PWDA supports creating clear regulations to allow the use of disability aids on flights if it is safe to do so, about how to check whether a disability aid can be used on a flight, and that require an explanation when they cannot be used.

4. Return mobility aids as soon as possible following flight arrival

Co-design participants wanted stowed disability aids returned as soon as possible.

It is proposed that:

- Airlines would need to return a person's mobility aid at arrival without delay. The passenger can choose whether their mobility aid is returned to the passenger gate or to the baggage claim.
- Where people give written instructions on how to disassemble or reassemble their wheelchair, airlines would need to follow those instructions before delivering the wheelchair back to the person.

It is critical that designated seating be provided at any point where a passenger may have to wait for their disability aid to be returned to them.

Recommendation 41: PWDA supports creating clear regulations requiring the return of mobility aids as soon as possible after flight arrival.

Improve service in-flight

5. Provide critical in-flight information in accessible formats

Co-design workshop participants wanted flight information provided in accessible formats.

It is proposed that

- Airlines would need to give critical flight information, like what to do in an emergency or how to use onboard facilities, in various formats such as Easy Read, Braille and Auslan.
- If a passenger with disability uses an electronic device to communicate and needs Wi-Fi to use it, airlines would need to allow that person to access available Wi-Fi free of charge.

In order to create emergency announcements accessible formats, it may be necessary to pre-record them. PWDA recommends airlines work with their disability advisory group to identify how best to do this.

Recommendation 42: PWDA supports regulating to require that flight information be made available in accessible formats, and that if wi-fi is available and a person needs to use it for their communication device to function, they should be provided with free access.

6. Make in-flight food and drink more accessible

Co-design participants wanted airlines to make food and drinks more accessible if they are offered by providing access to metal cutlery that makes it easier to consume meals, opening packaging if requested and providing information about where food or drink has been placed on the tray table.

Youth forum participants also raised the need for accessible allergy information about the food provided as most does not include an ingredients label.

It is proposed that;

- Where menus are provided, airlines would need to also provide a menu in large print or Braille.
- Cabin crew would need to help people with disability to open food and drinks if asked.

PWDA also thinks information about all food ingredients should be provided in accessible formats on request to help people with allergies, and that airline staff should provide

information about where food or drink is placed on the tray table for a person who requests it.

Recommendation 43: PWDA supports creating regulations to make in-flight food and drink more accessible.

Enable people with disability to have greater independence in-flight

7. Improve accessibility of aircraft toilets

Co-design workshop participants called for accessible toilets on aircraft. In addition to requiring at least one fully accessible toilet on a flight, some of the features people asked to be included in the accessible bathroom, like a tactile map, a grab handle, improved lighting, controls that require minimal force, and braille labelling do not require more space and could be added to all bathrooms to improve accessibility.

It is proposed that:

- Airlines would be required to have at least one accessible toilet on single- and twin-aisle aircraft. This also means that aircraft would be required to carry an on-board wheelchair.
- Airlines would need to put Braille signage, a tactile map, door handles, call buttons, grab bars, taps, and other controls or dispensers that can be used by a passenger with disability in at least one bathroom on an aircraft.
- Airlines would need to make sure any new single-aisle aircraft includes at least one bathroom large enough for a person with disability and their carer to access and use with the on-board wheelchair.

PWDA strongly supports the staged improvement process the proposal in the guidelines for upgrading existing bathrooms where many of the accessibility features that do not require more space are completed as part of a refurbishment program. We call for this work to be completed on all aircraft within 3 years.

We call for a deadline of no more than 5 years to require a fully accessible bathroom on all twin aisle aircraft, and 8 years for single aisle aircraft.

Recommendation 44: PWDA supports creating regulations to improve the accessibility of aircraft toilets within specified timeframes.

8. Make in-flight entertainment accessible

Co-design workshop participants called for in-flight entertainment to be offered in accessible formats.

It is proposed that:

- Airlines would need to make sure the digital entertainment they offer is accessible to people with disability.
- If the entertainment system on a plane is inaccessible, the airline must provide an accessible portable electronic device pre-loaded with accessible entertainment.

Recommendation 45: PWDA supports requiring that in-flight entertainment be made accessible.

9. Require aircraft to have accessible passenger controls

Co-design workshop participants explained that some aircraft had touch-screen controls that were inaccessible to people who were blind or had low vision, and others had controls that required a lot of pressure or strength to operate. An option suggested was to provide the person with an older style touch controller to plug in at their seat

Industry explained that some control features are set by manufacturers, and it may be difficult to have them changed.

It is proposed that:

Airlines would need to make sure their passenger seat buttons, such as lighting, seat recline and calling for flight attendant assistance, are:

- easy to feel by touch
- colour contrasted with its background, and
- can be used with minimal force.

Recommendation 46: PWDA supports requiring that aircraft have accessible passenger controls.

10. Increase the number of aircraft seats that have moveable armrests

Co-design workshop participants explained how fixed aircraft armrests can make transferring into seats impossible for some people. This was highlighted as a problem in business class seating, which may be more suitable due to having greater leg-room, but inaccessible due to the fixed arm rest preventing transfer.

It is proposed that:

Airlines would need to install seats that have moveable armrests. There are several options for how this could be done, including:

- all seats in new or upgraded aircraft
- at least half of seats in new or upgraded aircraft, or
- all aisle seats in new or upgraded aircraft.

PWDA calls for all seats in new or upgraded aircraft to have moveable armrests, where only some seats have moveable armrests, these must be clearly marked on aircraft seating plans as accessible and prioritized for booking by people who need this accessibility feature.

Recommendation 47: PWDA supports increasing the number of aircraft seats with moveable armrests across all classes of seating.

Conclusion

The development of these draft Aviation disability standards through a co-design process has required a huge investment of time, effort, energy, knowledge, good faith, and trust by all parties to the process. By agreeing to include PWDA, AFDO and JEC in the Steering Committee from the outset, and centring the expertise and lived experience of people with disability in the development of the standards, Government has achieved a step-change from the way consultation normally happens.

Addressing the concerns and issues raised by people with disability offers the opportunity to improve the accessibility and equity of travel, but in doing so to expand the customer base for the aviation industry. Clear standards also help the aviation sector better understand what needs to occur, and sets a 'level playing field' in this competitive sector.

We recognise that finalising the standards is not the end of the process. Regulation and ongoing evolution will be needed to ensure they operate effectively, and remain fit for purpose as transport technology changes.

The [Disability Standards for Accessible Public Transport Amendment 2026](#), and [Aviation Consumer Ombuds Scheme](#) once passed, will also impact the way they standards are implemented and complaints are handled. We look forward to this regulatory framework and standards improving aviation experiences for people with disability, and to the growth opportunities this offers the aviation sector.



PEOPLE WITH DISABILITY
AUSTRALIA

People with Disability Australia (PWDA) is a national disability rights and advocacy organisation made up of, and led by, people with disability.

For individual advocacy support contact PWDA between 9 am and 5 pm (AEST/AEDT) Monday to Friday via phone (toll free) on **1800 843 929** or via email at pwd@pwd.org.au

Submission contact

Bastien Wallace

Senior Policy Officer

E: bastienw@pwd.org.au

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