Disability Advocacy
Network Australia

2026

Submission

Aviation Disability Standards

October 2026

About DANA

As the national peak body for over 70 independent disability advocacy organisations, Disability Advocacy Network Australia (DANA) is uniquely positioned to contribute to the Australian Government's Department of Infrastructure, Transport, Regional Development, Communications, Sports (the Department) consultation paper on the new aviation disability standards. Our insights are grounded in lived experience provided to us by our member organisations and people with disability. DANA can approach this consultation and standards from a national, systemic disability advocacy perspective rather than responding to individual travel experiences. Through our national network, DANA is able to identify recurring barriers, emerging issues and practical solutions from across Australia, providing a comprehensive view of how aviation systems are working in practice.

Our Vision
People with disability are valued, safer, have quality of life and can reach their full potential.

Our Purpose
DANA's purpose is to strengthen, support and provide a collective voice for independent disability advocacy organisations across Australia that advocates for and with people with disability.

We achieve this by:

- promoting the role and value of independent disability advocacy
- providing a collective voice for our members
- providing communication and information sharing between disability advocacy organisations
- providing support and development for members, staff and volunteers of disability advocacy organisations
- building the evidence base to demonstrate the value of disability advocacy
- promoting the human rights, needs, value and diversity of people with disabilities

Contact:
Emma Bennison- Chief Executive Officer

Email: policy@dana.org.au

Executive Summary

DANA welcomes the opportunity to comment on the draft Aviation Disability Standards (the Standards). DANA proposes that the Standards become a meaningful, enforceable framework for equal access to air travel, not a collection of better-practice recommendations. Based on what DANA heard from people with lived experience and their advocates, the framework rests on four principles:

1. **Accessibility is a right, not a service.** Airlines should be accountable for a person's access needs across the whole journey, with one clear process for complaints, enforcement and compensation.
2. **Co-design must continue into implementation.** People with disability should be involved in implementing and reviewing the Standards and in designing airline and airport policies, facilities and services, including through disability reference groups.
3. **The Standards need competent staff, measurable outcomes and transparent reporting.** This means mandatory competency-based training, public reporting against consistent indicators, and an independent regulator.
4. **The Standards must work for people most likely to fall through the gaps.** This includes people with non-visible and complex disability, First Nations people, and passengers in regional and remote areas, with mobility aids treated as essential equipment and assistance that is flexible and accessible.

Eight recommendations give effect to these principles (outlined below). DANA welcomes the co-design approach taken so far and looks forward to continuing to work with the Department, airlines, airports and other stakeholders to put them into practice.

How DANA Consulted

This submission draws on a member consultation session with 13 DANA members and two individual interviews with people with lived experience of disability across September 2026. Independent advocates from DANA member organisations shared experiences of people they support which included people with physical, sensory, intellectual, cognitive, psychosocial and non-visible disability; people living in regional and remote areas, including First Nations people; assistance animal users; people who use wheelchairs, mobility scooters and other mobility aids and family members and supporters. DANA also heard from STX Travel, a specialist disability travel agency. Quotes in this submission are drawn from these sessions and have been de-identified. Together, these perspectives form the evidence base for each recommendation.

Recommendations

Recommendation 1: Make the airline accountable for the whole journey.
The Department should adopt the airline responsibility model (consultation paper section 1.1, Option 3).
The Standards should require:

- airlines to record a passenger's access needs once, at booking, and share them with every provider on the journey
- airlines to agree with airports and ground handlers who delivers each part of the assistance
- airports and screening providers to offer private screening and protect personal health information.

Recommendation 2: Create one complaints pathway, overseen by an independent regulator.
The Department should establish a single complaints, enforcement and compensation pathway covering airlines, airports and contracted providers, with:

- one entry point, so passengers do not have to work out who is responsible
- set response timeframes and written outcomes
- oversight by the independent regulator (Recommendation 5).

Recommendation 3: Require disability reference groups for every airline and airport.
The Standards should require all airlines and airports, not only those above the threshold in section 1.3, to:

- establish a diverse disability reference group, with members supported and paid to take part (smaller regional providers may share a group)
- consult the group before decisions on policies, services and infrastructure
- report publicly each year on the advice received and the action taken.

Recommendation 4: Require competency-based disability training.
The Standards should require airlines, airports, ground handlers and screening providers to ensure passenger-facing staff are:

- assessed against minimum competencies set with people with disability, not just recorded as attending
- reassessed annually, with practical skills tests for high-contact roles such as transfers and handling mobility aids
- trained using content co-designed and delivered by people with disability.

Recommendation 5: Set measurable outcomes, enforced by an independent regulator.
The Department should:

- establish an independent regulator with powers to investigate, audit and penalise airlines, airports and contracted providers
- require all airlines and airports to report annually against common indicators, such as missed assistance, damaged mobility aids, refusals and complaints
- publish this data in one place, in accessible formats.

Recommendation 6: Make the Standards work for people most likely to fall through the gaps.
The Department should:

- ensure guidance, training and assistance address non-visible, psychosocial, intellectual, communication and sensory disability, neurodivergence, and First Nations and culturally diverse passengers
- require the same accessibility outcomes on regional, remote and small-aircraft services
- work with CASA to resolve safety rules that prevent a person's usual support from being provided.

Recommendation 7: Treat mobility aids as essential equipment, not baggage.
The Standards should require airlines and airports to:

- let passengers stay in their own device as close to the aircraft door as practicable
- promptly repair or replace damaged or lost equipment, with a loan device in the meantime
- recognise a single battery approval across the whole journey.

Recommendation 8: Provide accessible information and flexible assistance.
The Standards should require airlines and airports to:

- provide accessible booking and clear information from booking to arrival,
- agree on assistance with the passenger, based on their own account of their needs
- treat the 48-hour notice period (section 2.3) as a duty to plan, not a cut-off
- not refuse travel solely because an assistance limit has been reached (section 2.2).

Overarching Policy Principles

Each proposed standard should establish an enforceable right where the person with disability retains choice and control and is assured of a consistent level of access. People with disability must also be able to clearly identify who is accountable, how compliance and outcomes are measured, and that there will be an accessible remedy when a standard is not met.

When considering the information, examples and recommendations from people with lived experience and their advocates, DANA proposes that this framework, based on the proposed standards and policy options, be shaped by the four overarching principles below. Each principle sets out the relevant standards and proposed policy options.

Accessibility is a right, not a service

Airlines and airports often frame meeting a person's access needs as a 'service' they can or cannot meet, such as assistance to a gate, an aisle wheelchair on board an aircraft or providing menus and other information in accessible formats. This level of assistance frequently changes depending on the airport, aircraft or staff member a person encounters. The Standards apply to all Australian airlines and airports, and they should make clear that meeting access needs is an obligation owed to every passenger, not a service offered at the provider's discretion. The quote below illustrates some of the challenges that people with disability experience due to inconsistent standards.

> *"I have colleagues/friends who dehydrate themselves before taking an aeroplane journey because they can't access the toilets or depend on those aisle chairs that they don't have any control over."*
> - DANA member

DANA recommends that the intended outcomes of the Standards be reframed. Accessibility should not be treated as a service that airlines and airports choose to offer, but as a human right that must be guaranteed to everyone at all times.

The development of the Standards presents an opportunity to establish clear, enforceable rights for people with disability, rather than relying on individual airline or airport policies and variable levels of good practice. As one member explained when discussing travel with various Australian airlines:

> *"None of them have a coherent policy that is applied consistently"*
> - DANA member

DANA recommends that the Standards include regulatory requirements wherever they are necessary to achieve consistent access and eliminate discrimination.

The passenger should not be responsible for coordinating a complex system

Passengers with disability should not be expected to work out which organisation is responsible for meeting their access needs. Operational responsibilities may be shared, but accountability must be clear and seamless from the passenger's

perspective, with consistent access across the full journey, including connections and transfers.

When booking, a person with disability cannot know each airline's policies and procedures, or the layout and facilities of each airport. The airline therefore needs to provide information and ask questions to identify the passenger's access needs, from arrival at the departure airport to departure from the destination airport.

Passengers should not have to contact multiple airports, seek separate approval to fly or travel with mobility aids, or coordinate assistance at each point of travel. A specialist travel agent advised DANA that most airlines require passengers to book assistance animals directly with the airline. This prevents some people with disability from using a travel agent to navigate these arrangements, a service available to all other travellers. Without one point of coordination, passengers are left to plan around unknowns, as one member explained:

> *"Sometimes it's really hard to plan for a trip to the airport if we don't know what we're planning. Are we meeting people? Are we going to the gate really far away? What do we need to bring to address that?"*
>
> *- DANA member*

The airline is the passenger's first point of contact when planning and booking, and it is usually the one constant across the whole journey. DANA therefore proposes that the airline be accountable for ensuring the passenger's access needs are met. The airline should liaise with airports, ground handlers and other customer service points so they are informed and assistance is arranged, while those organisations retain their own obligations under the Standards.

Complaints, enforcement and redress

The complaints and enforcement framework should be simple to navigate and coordinated across aviation regulation, disability discrimination law and consumer protection. Passengers should not be required to identify the legal or organisational source of a failure before seeking assistance or redress.

Responsibility for receiving complaints, investigating non-compliance, resolving disputes and providing appropriate remedies should be clearly defined, including where responsibility is shared across airlines, airports and ground handlers.

Passengers must also have confidence that complaints will lead to meaningful action. The framework should include clear timeframes for responding to complaints, accessible communication throughout the process, transparent reporting of

outcomes, and mechanisms to identify and address systemic issues. Without clear accountability and oversight, people with disability are often left to navigate complex and fragmented processes, with little visibility of whether concerns have been addressed or improvements made.

An effective complaints system should not only resolve individual disputes but also drive continuous improvement across the aviation sector. DANA heard that this is what happens now: in both security screening examples below, the member complained and received no feedback on what, if anything, was done. If adopted, a single pathway would mean passengers raise a problem once, know who is responsible for fixing it and by when, and can see those recurring failures lead to change.

Security screening

During consultation, members raised concerns about security screening at airports, including having mobility aids and medical equipment removed, and a lack of privacy, such as staff calling out personal health information to colleagues.

One member who uses a colostomy bag described the body-scan screen facing the public, so that others, including her work colleagues, could see her colostomy bag, while a security officer called the information across to a colleague. When she complained to the airport, she was told it would be raised with security, but there was no follow-up. It has continued to happen at various airports.

Another member described being separated from her guide dog at security and subjected to an intrusive pat-down. Raising a complaint was a further barrier because security is a contracted service, and she received no feedback on how it was handled.

Human dignity is a foundational human rights principle, and as the examples above illustrate, current screening practices can undermine dignity, privacy and autonomy for people with disability. The Standards should ensure that security processes are conducted in ways that respect personal privacy, protect confidential health information, and enable people with disability to travel without humiliation, unnecessary intrusion or loss of independence. If adopted, passengers would be screened in private when they need to be, and their equipment, assistance animals and health information would be handled consistently and respectfully at every airport.

Recommendations:

Recommendation 1: Make the airline accountable for the whole journey.

The Department should adopt the airline responsibility model (consultation paper section 1.1, Option 3). The Standards should require:

- airlines to record a passenger's access needs once, at booking, and share them with every provider on the journey
- airlines to agree with airports and ground handlers who delivers each part of the assistance
- airports and screening providers to offer private screening and protect personal health information.

Outcome: Passengers tell one organisation what they need, once, and that organisation is answerable for delivering it.

Recommendation 2: Create one complaints pathway, overseen by an independent regulator.
The Department should establish a single complaints, enforcement and compensation pathway covering airlines, airports and contracted providers, with:

- one entry point, so passengers do not have to work out who is responsible
- set response timeframes and written outcomes
- oversight by the independent regulator (Recommendation 5).

Outcome: Problems are fixed without passengers navigating several organisations, and recurring failures are corrected.

Co-design must continue into the implementation of the Standards

DANA acknowledges and welcomes the co-design approach used to develop the draft Standards and associated policy options. This approach should continue beyond the current consultation. People with disability should have a substantive and ongoing role in implementing, monitoring, evaluating and reviewing the Standards, and in the design and oversight of the systems and processes adopted by government, airlines, airports and other stakeholders at local, regional and national levels.

Opportunities for ongoing co-design include, but are not limited to, disability reference groups (detailed below), the design of accessible facilities and systems, and the employment of people with disability.

Disability Reference Groups

DANA supports the establishment of disability reference groups as a key regulatory mechanism for sustained co-design and accountability. This requirement should apply to airlines and airports of all sizes, across metropolitan, regional and remote locations. At present, engagement with people with disability depends on each

provider's willingness to seek it, and the consultation paper proposes reference groups only for providers above a passenger threshold (section 1.3). This would leave passengers using smaller regional and remote services, where members reported some of the most serious barriers, without a voice in how those services are designed.

Importantly, reference groups should reflect the diversity of people with disability. Members should receive the accessibility supports they need to participate and be fairly remunerated for their time and expertise. Their role should be substantive, not advisory in name only. Reference groups should be engaged early enough to influence the development of policies, operational systems, infrastructure and service design. Airlines and airports should be required to report transparently on the matters raised by reference groups, the actions taken in response and the reasons for any decision not to act.

DANA recognises that establishing individual reference groups may be difficult for smaller regional and remote airports and airlines. In these circumstances, providers with comparable operating environments should be permitted to establish a shared or network-based disability reference group, provided it enables meaningful participation and clear accountability. Each provider should still report individually on its response. If adopted, every provider would hear directly from the people who use its services, and people with disability could see what difference their advice made.

Design of Accessible facilities and systems

> *"I think that's the easiest thing that airlines and airports can do is having an accessible physical environment, because it's well known how to do that."*
>
> - DANA member

Because the knowledge already exists (e.g., the Disability Access to Premises — Buildings Standards 2010; the existing Transport Standards; Australian Standard AS 1428 and universal design guidance), there is little justification for inaccessible facilities.

People with disability and disability organisations with relevant expertise should be engaged early in designing and reviewing policies, procedures, infrastructure, facilities, layout, furniture and services, because they can identify barriers and solutions from lived experience. This engagement must be meaningful and valued, and the people involved should be paid for their time and expertise. As an example, the toolkit for engaging people with disability on the Disability Gateway cites NDIS

participant engagement rates[1] of $50 per hour or $250 per day as examples, with higher rates where people contribute in partnership, governance or leadership roles. The Standards should require providers to pay at least these rates, and higher rates for partnership, governance or leadership roles, so that engagement is not unpaid or left to each provider's interpretation.

Members also raised that current services fall short of existing legal obligations. For instance, under the Disability Discrimination Act 1992 (Cth) a service provider is expected to make adjustments to enable a person with disability to access services on an equal basis with others, unless doing so would impose an unjustifiable hardship or there is a legitimate safety requirement that cannot be addressed. The experiences shared through this consultation suggest that, in practice, these obligations are not being consistently understood, implemented or enforced across the aviation sector, leaving people with disability unable to access air travel on an equal basis with others as reflected in the quote below:

> *"We don't have accessible services that meet the reasonable adjustment provisions under the Disability Discrimination Act"*
> - DANA member

Employment of people with disability

DANA also encourages airports and airlines not only to engage people with disability intermittently, but to actively recruit and employ them in roles throughout their organisations. This would demonstrate a commitment to accessibility and build each organisation's ability to implement accessible policies, systems and infrastructure.

There is also strong evidence that involving people with disability in the design and delivery of services leads to better outcomes. For example, the Australian Public Service has adopted a whole-of-government disability employment strategy[2], recognising that increasing the representation of people with disability strengthens the quality of policy, programs and services by bringing lived expertise into decision-making. The strategy is explicitly intended to help create a public service that better reflects the diversity of the community and delivers better policies and services for Australians.

The development and implementation of the Standards should be guided by this principle. People with disability should not only be consulted on the Standards but

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[1] Disability Gateway, "Having your time and work recognised", in the Toolkit for engaging people with disability in evaluation (published 17 September 2025): https://www.disabilitygateway.gov.au/ads/toolkit/factsheet4

[2] APS Disability Employment Strategy, https://www.apsc.gov.au/publication/aps-disability-employment-strategy-2020-25

actively involved in their design, monitoring and evaluation, ensuring that lived experience informs practical solutions and leads to more accessible, effective and accountable aviation services.

Recommendations

Recommendation 3: Require disability reference groups for every airline and airport.
The Standards should require all airlines and airports, not only those above the threshold in section 1.3, to:

- establish a diverse disability reference group, with members supported and paid to take part (smaller regional providers may share a group)
- consult the group before decisions on policies, services and infrastructure
- report publicly each year on the advice received and the action taken.

Outcome: Barriers are removed before passengers encounter them.

Standards need competent staff, transparent reporting and independent oversight

The Standards should be built around measurable outcomes that can be monitored, reported on and enforced. The examples in this submission - from inconsistent approvals to rigid assistance policies - show that requirements on paper do not change passengers' experience unless someone is responsible for delivering them and held to account. This section outlines three enablers of that approach: competent staff, transparent reporting and an independent regulator. If adopted, accessibility would rest on enforceable obligations rather than the goodwill of individual providers.

Mandatory disability competency training

DANA supports mandatory disability training for airline, airport, ground-handling and security screening staff. The Standards should require competency-based training that equips staff to perform their responsibilities safely, lawfully and respectfully, rather than relying on generic disability awareness training. Members' experiences with aisle chairs, mobility aids and security screening show that good intentions are not enough without practical skills.

Awareness training tells staff that disability varies, whereas competency training ensures they can safely do the task in front of them. A lack of practical training leads to rigid assistance that does not fit the person. Training should cover disability rights, dignity and autonomy; accessible communication; non-visible disability; neurodivergence; intellectual and cognitive disability; psychosocial and sensory disability; safe transfers; mobility equipment; assistance animals; and appropriate

responses to distress. DANA considers that these areas are critical to staff recognising and responding to the diverse needs of passengers with disability, and to reducing the risk of harm or discrimination. People with disability should be meaningfully involved in the design, delivery and evaluation of this training.

The Standards should prescribe minimum competencies, assessment requirements and regular refresher training. Additional requirements should apply to staff performing high-risk or high-contact functions, including passenger transfers, boarding assistance, security screening and the handling of mobility aids. If adopted, passengers would receive assistance from staff who can deliver it safely and respectfully, wherever they travel, rather than depending on the skills of whoever is on shift.

Transparency and public reporting

DANA strongly supports mandatory public reporting on the accessibility performance of all airlines and airports. Public reporting is essential for transparency, accountability and continuous improvement. It enables passengers, regulators and industry to understand whether accessibility outcomes are being achieved in practice, identify trends and systemic issues, and assess whether providers are taking effective action to address failures. Reporting should provide meaningful information about outcomes, service failures and remedial action, rather than simply listing activities undertaken or policies adopted.

At a minimum, providers should report against consistently defined indicators, including complaints; missed or delayed assistance; damage to or loss of mobility aids; denied boarding; refusals of assistance; unsafe transfers; assistance-animal incidents; and completion of disability competency training. These indicators provide insight into whether people with disability are able to travel safely, independently and with dignity, and help identify patterns of poor performance, emerging risks and areas requiring corrective action. Airlines and airports should also report on services delivered by their contracted providers, ensuring accountability extends across the entire passenger journey and cannot be avoided through outsourcing arrangements.

At present, there is no consistent, comparable public data on the accessibility performance of airlines and airports, which makes it difficult for passengers, regulators and industry to see whether obligations are being met. Data should be published annually and in accessible formats, so that performance and improvement can be seen. Common definitions, reporting periods and measures should be used wherever practicable, so that providers can be compared, trends tracked over time, and poor performance cannot be obscured by differing reporting practices. If adopted, passengers would be able to see how providers perform before they travel.

Complaint and enforcement data should also be used to identify recurring and systemic failures and to inform regulatory action. At present, the onus of making a complaint falls on the passenger, and the process focuses on resolving that individual's issue with the airline or airport. It does not inform systemic change for other passengers. Using this data would move the system from responding to individual incidents to addressing the root causes of accessibility barriers. If adopted, recurring failures would be identified and corrected rather than repeated, and the burden of fixing problems would no longer fall on the passengers who experience them.

Regulation and enforcement

Members called for an independent regulator to investigate and enforce compliance with the Standards. Members emphasised that without independent oversight, accessibility obligations risk being treated as optional, inconsistently applied, or dependent on the goodwill of individual providers rather than being recognised as enforceable rights. An independent regulator would provide a clear mechanism for accountability, ensure complaints are investigated, monitor compliance across the sector, and drive systemic improvements where recurring issues are identified.

> *'…I think it needs to be regulated. I don't think we can leave it up to the airport or the airlines to do it."*
>
> *- DANA member*

Another member noted that airlines appear to be starting to make changes and be more proactive but treat this as goodwill.

> *"They are looking at it as a sort of goodwill…but I think there needs to be legislation that is necessary for them to do it and then it be regulated."*
>
> *- DANA member*

DANA agrees that accessibility should not depend on the commitment or priorities of individual airlines, airports or contractors. A regulatory framework with independent oversight is necessary to ensure consistent standards, provide certainty for passengers, and reinforce that accessible air travel is a right, not a discretionary service. Under current arrangements, compliance with disability standards is largely enforced through individual complaints made after the event, and there is no dedicated regulator with powers to proactively monitor and enforce compliance across aviation. If adopted, an independent regulator would give passengers confidence that obligations will be checked and enforced, and give providers a clear, consistent understanding of what compliance requires.

Recommendations

Recommendation 4: Require competency-based disability training.
The Standards should require airlines, airports, ground handlers and screening providers to ensure passenger-facing staff are:

- assessed against minimum competencies set with people with disability, not just recorded as attending
- reassessed annually, with practical skills tests for high-contact roles such as transfers and handling mobility aids
- trained using content co-designed and delivered by people with disability.

Outcome: Passengers receive safe, respectful assistance wherever they travel.

Recommendation 5: Set measurable outcomes, enforced by an independent regulator.
The Department should:

- establish an independent regulator with powers to investigate, audit and penalise airlines, airports and contracted providers
- require all airlines and airports to report annually against common indicators, such as missed assistance, damaged mobility aids, refusals and complaints
- publish this data in one place, in accessible formats.

Outcome: Accessibility rests on enforceable obligations, and passengers can compare providers.

Standards must work for people who are most likely to fall through the gaps

The Standards must recognise the full diversity of disability and ensure that their design and implementation do not advantage passengers whose access requirements are more visible, readily understood or easily accommodated. Without an explicit focus on inclusion, there is a risk that accessibility measures will be designed primarily around physical disability, leaving many people unable to access air travel on an equal basis with others.

The Standards must expressly address the access requirements of people with non-visible disability, psychosocial disability, autism and other forms of neurodivergence, intellectual disability, communication disability, sensory disability, and complex or multiple disabilities. These groups can experience significant barriers throughout the passenger journey, yet their needs are often overlooked because they are less visible or not well understood by service providers.

The Standards must also respond to the circumstances of people travelling independently, people from culturally and linguistically diverse backgrounds, First Nations people with disability, and passengers using regional and remote airports. Accessibility outcomes can vary considerably depending on a person's location, cultural background, communication needs and availability of support, and the Standards must ensure consistent access and protections regardless of where or how a person travels.

The examples below, drawn from DANA's consultation, show how inconsistent processes and rigid policies leave people without the access they need. They demonstrate why accessibility requirements must be designed to accommodate diverse needs and circumstances, rather than relying on one-size-fits-all approaches or individual discretion

Mobility Aids

Mobility equipment should be recognised and treated as essential personal equipment, rather than as ordinary baggage. For many people with disability, mobility aids are fundamental to their independence, safety, participation and dignity, and damage to or separation from these devices can have significant physical, emotional and practical consequences. Passengers should be able to remain with their mobility device for as long as reasonably practicable and should not be transferred unnecessarily or substantially earlier than other passengers. Early removal from mobility devices and prolonged use of airline wheelchairs can reduce independence, increase discomfort, create safety risks and result in people with disability being treated differently from other passengers.

The Standards should promote dignity, safety and autonomy throughout transfers and boarding, minimise the time passengers spend in unsuitable airline wheelchairs, and require appropriate consideration of each passenger's individual needs. If adopted, passengers would remain in their own equipment until boarding, keep their independence and be treated consistently with other passengers, rather than depending on the practice of a particular airline or airport.

DANA heard from a member who described a conversation with a wheelchair user about why this matters:

> *"…something that would really be useful is the usage of their wheelchair right up until the point of time when they need to board because they use the wheelchair for a lot of things. The individual that I spoke to said he uses it to maintain his parenting role, uses it to toilet and to do a number of vital roles."*
>
> - DANA member

The Standards should distinguish between measures to prevent damage to or loss of mobility equipment and the remedies available when it occurs. Effective handling procedures cannot undo the harm caused when essential equipment is damaged, particularly when that equipment is costly, customised, and critical to a person's independence. The Standards should establish robust requirements for safe handling, tracking, accountability and prompt recovery, linked to broader aviation consumer-protection reforms on compensation and redress. Where equipment is damaged or lost, responsibility must be resolved promptly. If adopted, no passenger would be left without a suitable mobility device while providers dispute responsibility.

DANA was told by a member who uses a mobility scooter about checking it in with lithium batteries, and that there is no consistent policy or process across airports and airlines.

> *"For example, I have to apply to the airline for a special certificate to say that I'm allowed to carry a lithium battery, but it's got to be taken on the plane with me. It can't be carried underneath because it could explode. Even though I've got that piece of paper, the person at the airport looks at it behind the counter when I check in and they say, oh, I've got to ring a supervisor. It's already been cleared by the airline, but they've got to ring a supervisor. And invariably, it takes me two hours from check in to getting to the gate because there's no coordination between that piece of paper and the boarding pass."*
>
> - DANA member

This quote demonstrates an approval given by one organisation not being recognised by another. Within applicable safety rules, a passenger should need to seek approval only once, and airlines and airports should recognise it throughout the journey. If adopted, this would remove the duplicated checks that currently add hours to check-in and risk a missed flight.

Accessible Information and Communication

A common theme in the feedback DANA received was that airlines and airports need to improve the accessibility of the information they provide, both what they communicate and how. When booking platforms and approval processes are inaccessible or unclear, passengers with disability cannot plan their journey with confidence. They may not learn what approvals or arrangements they need until they reach the airport, which risks delays, missed flights or being unable to travel.

The Standards should therefore require that booking platforms are accessible from the point of booking and give accurate, clear and easy-to-read information about booking accessible services, seeking approval to check in mobility aids (including

those with batteries), and what to expect at the airport and on board. If adopted, passengers would be able to book, seek approvals and prepare for their journey independently and with confidence, with fewer surprises and delays on the day.

Flexible policies and customer service

Airlines and airports apply different policies, processes and services when assisting people with disability, often with limited flexibility. People with disability have diverse mobility and access needs, levels of independence, travelling companions, cultural and language requirements, reasons for travel and journey types. When policies are applied rigidly, passengers can be given help they do not need, or refused help they do, and the result depends on which airline, airport or staff member they encounter. Policies, processes and services must therefore be flexible enough to respond to individual circumstances and ensure access needs are met, so that the person retains choice and control. If adopted, assistance would be based on each passenger's own account of their needs and would not vary with the practice of a particular provider.

The proposed 48-hour advance notice requirement in the draft Standards should create a stronger obligation on providers to plan and guarantee assistance. It should not become a threshold below which a person loses their right to assistance. People with disability may need to travel at short notice because of emergencies, changed circumstances or disrupted travel, and assistance must still be available to them. The Standards should therefore make clear that assistance remains available regardless of when a request is made, subject only to genuine and clearly defined operational constraints. If adopted, passengers who must travel at short notice would not lose assistance because of when they asked, while providers would still be able to plan.

Limits on the number of passengers who can be assisted on a flight should not be applied rigidly. A passenger should not be refused travel solely because a limit has been reached, unless the provider has first explored practical alternatives with them, such as rebooking on another service or arranging additional assistance. This matters most for people departing from or arriving at regional airports, who often have limited flight options and may be unable to take another flight, especially if they are travelling with others, for work or for major events. If adopted, passengers would not be prevented from travelling by a numerical limit alone, and providers would still be able to manage capacity.

The definition of a 'passenger needing assistance' also needs to be clearer. DANA heard reports of passengers being counted as needing assistance who then walked across the tarmac and up the steps onto the plane, having needed help only to the gate. Counting these passengers as needing full assistance inflates the number recorded and risks using up limited places, which can leave passengers who need full help unable to travel. The definition should distinguish between passengers who

need assistance to the gate and those who also need assistance to board and disembark, so that limits reflect the assistance required without removing entitlement to either.

Assessment of need should rely on the passenger's own account, not on how their disability appears to staff, because many access needs are not visible and people with disability are best placed to judge their own needs. If adopted, assistance limits would reflect the help passengers actually need, so people are neither turned away nor counted against limits for help they do not use.

DANA was told about an experience involving a member's partner and brother at an airport, which shows that assistance should be adapted to the person's needs after discussion with them:

> *"My partner who is completely deaf and uses Auslan and my brother who has cerebral palsy but also is non-verbal and communicates via Auslan were travelling with an interpreter to an event… they were greeted with someone who had two wheelchairs lined up for them. But they're both mobile, they're both able to walk. What they wanted to do is put their bags on the wheelchairs and have that person push the bags to the gate so they could then converse with the interpreter… This person thought that that was not acceptable because they weren't sitting in the wheelchairs… that came down to a lack of training, basic disability awareness and rigid policies."*
>
> *- DANA Member*

If adopted, passengers would be asked what help they need, rather than being given a standard service that does not fit.

Regional and small aircraft accessibility

DANA cautions against allowing aircraft size, regional location or operational constraints to justify lower accessibility standards. While there may be legitimate differences in how smaller operators implement requirements, the underlying right to accessible air travel must remain consistent. People in regional and remote communities often have limited alternatives to a small-aircraft service, so lower access leaves them with no other way to travel.

The Standards should therefore expressly address the experiences and access requirements of people travelling to and from regional and remote communities.

DANA heard about the difficulties First Nations people with disability face travelling to and from Country, where flights are run by smaller airlines using smaller airports.

A member from far north Queensland gave this example of a client he had supported:

> *"A young gentleman who lives in a remote community …was forced to bottom shuffle his way across the tarmac in the heat because there was no provision for him to get in and out of the airline. And the person that usually carries him on and off the airline, which they thought was normal, was not able to get into the tarmac because of CASA regulations, and that's how bad it is up here."*
>
> *– DANA Member*

This example shows a person left without safe, dignified access to an aircraft, and how safety rules appear to prevent a person's usual support from being provided. The Department should work with the Civil Aviation Safety Authority (CASA) to resolve conflicts of this kind, so that safety rules and access obligations are met together. If adopted, people travelling to and from regional and remote communities would have access that does not depend on the size of the aircraft or airport.

Recommendations

Recommendation 6: Make the Standards work for people most likely to fall through the gaps.
The Department should:

- ensure guidance, training and assistance address non-visible, psychosocial, intellectual, communication and sensory disability, neurodivergence, and First Nations and culturally diverse passengers
- require the same accessibility outcomes on regional, remote and small-aircraft services
- work with CASA to resolve safety rules that prevent a person's usual support from being provided.

Outcome: Access does not depend on the type of disability a person has or where they live.

Recommendation 7: Treat mobility aids as essential equipment, not baggage.
The Standards should require airlines and airports to:

- let passengers stay in their own device as close to the aircraft door as practicable
- promptly repair or replace damaged or lost equipment, with a loan device in the meantime
- recognise a single battery approval across the whole journey.

Outcome: Passengers keep their independence and are not stranded by damaged equipment or duplicated checks.

Recommendation 8: Provide accessible information and flexible assistance.
The Standards should require airlines and airports to:

- provide accessible booking and clear information from booking to arrival
- agree assistance with the passenger, based on their own account of their needs
- treat the 48-hour notice period (section 2.3) as a duty to plan, not a cut-off
- not refuse travel solely because an assistance limit has been reached (section 2.2).

Outcome: Passengers can plan independently, travel at short notice and receive help that fits them.

Conclusion

The experiences DANA heard share a common thread: where access depends on the airport, airline or staff member a person meets, people with disability are left to manage the gaps themselves. The Standards can change this by setting clear, enforceable rights, by making accountability visible, and by measuring outcomes rather than activity. DANA urges that the Standards adopt these recommendations.

DANA welcomes the opportunity to work with the Department, airlines, airports, regulators and other stakeholders, and to support people with disability in being involved in the implementation, monitoring and review of the Standards, so that access to air travel is guaranteed to everyone, at all times.