Carers Tasmania's Submission

on the Draft Aviation Customer Rights Charter

February 2025

About Carers Tasmania

Carers Tasmania is the Peak Body representing the more than 87,000 informal carers (hereafter carers) in the state.

Carers Tasmania's vision is for an Australia that values and supports carers.

Our mission is to work to improve the health, wellbeing, resilience and financial security of carers and to ensure that caring is a shared responsibility of family, community, and government.

Our values drive everything we think, say, and do.

- **Carers first** – we listen to what carers need, commit to their desired action plan, and deliver results that matter most to carers
- **Care in all we do** – we care for our work, about each other, about Tasmania's family and friend carers, and the bigger world we all share
- **Integrity always** – we are transparent, act ethically, own when things don't go to plan and do what we say we will
- **Quality every time** – we don't accept 'good enough' because carers deserve our very best every time
- **Speed that matters** – we are agile and don't put off what can be done today.

These values represent how we engage with and serve carers, how we work with each other, and our commitment to the broader community. Carers Tasmania encourages partnership with governments and health and community sectors to enhance service provision and improve conditions for family or friend carers through policy development, research and advocacy.

We acknowledge and support people of all genders, sexualities, cultural beliefs, and abilities and understand that carers in Tasmania, whilst sharing the common theme of caring for a family member or friend, are diverse individuals with varying beliefs, experiences, and identities. We value and respect the diversity of carers, their lived and living experiences, and recognise that carers are the experts in their own lives.

Carers Tasmania has offices in Moonah, Launceston and Burnie.

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1. Background

Carers Tasmania is the Peak Body representing the more than 87,000 informal carers within the state.

A carer is a person who provides unpaid care and support to a family member, or friend, with disability, mental ill health, a chronic or life-limiting condition, alcohol or other drug dependence, or who is frail or aged. Informal kinship carers who care for a child under the age of 18, because the parent is unable to, are also recognised as carers. Carers are predominantly family members, but may also be friends, neighbours, or colleagues. Informal carers are not to be confused with paid support workers who are often called 'carers', with the difference being that support workers are fully employed and remunerated with all the benefits of employment. On the contrary, informal carers perform their caring duties without remuneration, other than minimal carer payments and allowances from the Australian Government.

In addition to representing carers through the Peak Body activities, Carers Tasmania provides support to carers living in Tasmania through its service delivery arm, Care2Serve. The Australian Government Carer Gateway program is delivered through Care2Serve in Tasmania, as are other supports and services, such as the Tasmanian Government's Home and Community Care program.

Anyone may become a carer at any time. The likelihood of this occurring in Tasmania is high, with estimates showing that one in six people living in Tasmania is a carer. This proportion is higher than the national average. The Australian Bureau of Statistics Survey of Disability, Ageing and Carers (SDAC) revealed that there were 80,100 carers in Tasmania in 2018.[1] By 2022, this figure had increased to more than 87,000.[2]

The Carer Gateway program provides a range of free services and supports for carers which are designed to build resilience and knowledge, increase wellbeing, improve quality of life, and sustain carers to effectively continue their caring roles. The available supports include the provision of information, advice and referrals, holistic identification of carer strengths and needs through a carer support planning process, professional counselling, peer support, and coaching which aims to support carers in achieving specific goals.

Care2Serve, through the Carer Gateway, has capacity to fund certain instances of planned, practical support services such as in-home respite, personal care, domestic assistance, and meal preparation. Care2Serve may also fund items such as laptops to assist carers who are studying or trying to enter the workforce. Care2Serve also coordinates the provision of emergency support during instances where a carer may be unable to provide the care that they usually do, resulting from unexpected illness or injury of the carer.

[1] Australian Bureau of Statistics (2021). 44300DO006_2018 Disability, Ageing and Carers, Australia: Tasmania, 2018. Australian Bureau of Statistics. (abs.gov.au)
[2] Australian Bureau of Statistics. (2022). Disability, Ageing and Carers, Australia: Summary of Findings, 2022. Australian Bureau of Statistics (abs.gov.au)

2. Introduction

Carers Tasmania is pleased to provide a brief response to the consultation on the Draft Aviation Customer Rights Charter (the draft). Improving the safety of, and access to, transport options is essential for everyone. The development of this Charter provides an important opportunity to strengthen aviation processes to ensure that flying is more enjoyable, less stressful, and accessible for all people.

As previously highlighted, Tasmania is home to more than 87,000 carers who provide unpaid care for others who require support.[3] These support needs are incredibly diverse, as are Tasmanian carers. Evidence shows that more than half of Tasmanian carers live with disability or a significant health concern of their own, and it is estimated that in Tasmania, 21,300 people aged 65 or over are in a caring role.[4] Approximately 9,300 of Tasmania's carers are young carers who are aged 25 or under.[5] Some carers have one caring role, whilst others have multiple.

Tasmania also faces unique challenges in terms of varying literacy levels, alongside high rates of disability, mental ill health, chronic health conditions, and a rapidly ageing population.[6,7] The diverse experiences, needs and attributes of Tasmanians must be considered within the Charter, associated documents, and training for aviation employees.

3. Feedback on the draft Charter

First and foremost, Carers Tasmania recommends the Charter includes a definition of the term carer. As the Charter is an Australian Government initiative, it must refer to the definition of carer as per the *Commonwealth Carer Recognition Act 2010*. Carers are currently defined within this Act as:

> *"A carer is an individual who provides personal care, support and assistance to another individual who needs it because that other individual:*
>
> *(a) has a disability; or*
>
> *(b) has a medical condition (including a terminal or chronic illness); or*
>
> *(c) has a mental illness; or*
>
> *(d) is frail and aged."* [8]

Including a clear definition within this Charter, that aligns with other relevant pieces of legislation, will greatly assist in clarifying the rights and responsibilities of all people accessing and involved within aviation services.

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[3] Australian Bureau of Statistics. (2022). Disability, Ageing and Carers, Australia: Summary of Findings, 2022. Australian Bureau of Statistics (abs.gov.au)
[4] Ibid.
[5] Australian Bureau of Statistics. (2018). Disability, Ageing and Carers, Australia: Summary of Findings methodology. ABS. https://www.abs.gov.au/methodologies/disability-ageing-and-carers-australia-summary-findings/2018.
[6] Australian Bureau of Statistics. (2021). 2021 Tasmania, Census All persons QuickStats | Australian Bureau of Statistics (abs.gov.au)
[7] Australian Education Union. (2023). Alarming new report on poor literacy levels highlights urgent need for investment in Tasmanian schools - AEU Tasmania
[8] Commonwealth of Australia. (2010) Commonwealth Carer Recognition Act 2010. Federal Register of Legislation - Carer Recognition Act 2010

Carers Tasmania broadly supports the proposed rights of Aviation Customers as stated in the Consultation Paper:

> *"Aviation Customers have the right to:*
>
> *1. Be treated with dignity and respect, in an accessible and inclusive environment*
>
> *2. Accurate, timely and accessible information and customer service*
>
> *3. Prompt and fair remedies and support during and after cancellations, delays and disruptions*
>
> *4. Safe and timely baggage handling and fair remedies for damage and delays*
>
> *5. The protection of their personal information*
>
> *6. Provide feedback, make complaints and exercise their rights without retribution."* [9]

These rights are good overarching guidelines, but they require further development, policy, processes and training to action them. We highlight that Disability Voices Tasmania (DVT) who are a cross-disability organisation committed to building the collective voice of Tasmanians with disability,[10] have provided some specific feedback on further inclusions and considerations for the Charter which are focused on the rights of people with disability. We echo the recommendation of Disability Voices Tasmania that there must be a commitment by each specific airline agency to uphold this Charter and to be held accountable when it is deemed that they have failed to do so.

In addition, we recommend the Charter includes clearly defined rights and information for carers of Aviation Customers. Further, we recommend the Charter actively encourages airlines and airports to have this information easily accessible to all customers and their carers.

4. Conclusion

Carers Tasmania thanks the Australian Government for their commitment to improving aviation experiences for all people. We hope that our feedback will be taken into consideration in the finalisation of the Charter. It is important that carers are clearly and consistently defined within the Charter, associated documents, and resources, and that pathways for carers to access support and information are clearly identified.

[9] Commonwealth of Australia. (2024). Aviation customer rights charter. aviation-customer-rights-charter-consultation-paper.pdf
[10] Disability Voices Tasmania. (n, d). https://www.disabilityvoicestas.org.au/