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Dear Secretariat

**Response to Review of the Disability Standards for Accessible Public Transport  
2002 Draft Report**

ABF is the peak body representing the blindness and vision impairment sector.

As a member-based organisation, we have drawn on the collective expertise of our membership to formulate a response to the Draft Report, with particular emphasis on the implications for Australians who are blind or vision impaired.

Please find our response attached.

Yours sincerely

**Tony Starkey**  
**Australian Blindness Forum**



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## **Australian Blindness Forum**

### **Response to Review of the Disability Standards for Accessible Public Transport 2002 Draft Report**

#### **About the Australian Blindness Forum**

The Australian Blindness Forum (ABF) was formed in 1992 and is funded only by its members. The ABF is an Australian public company limited by guarantee and governed by a Board of Directors.

ABF exists to:

- Encourage exchange of information between members.
- Exert influence on government policy development.
- Enable blindness sector representation, both nationally and internationally.
- Enable Australia to facilitate its membership of the World Blind Union.
- Encourage and promote the development and equity of the level of services throughout Australasia.

Membership of ABF is open to any organisation that has as its primary objects the provision of services to people who are blind or vision impaired, or whose activities are substantially connected with the welfare of people who are blind or vision impaired, and those whose activities are substantially related to the prevention of blindness.

ABF combines the voice of people who are blind or vision impaired with that of the specialist service providers across the sector. As Australia's representative to the World Blind Union, the ABF has strong connections with the international blind and vision impaired community.

ABF is represented in every state and territory of Australia and all major organisations providing services to Australians who are blind or vision impaired are members of ABF.

The Australian Blindness Forum comprises 22 blindness sector service providers whose expertise and knowledge is reflected in the following comments. ABF is the peak body representing rehabilitation in the blindness sector.

The following organisations are members of ABF:

- Association for the Blind WA / Guide Dogs WA
- Blind Citizens Australia
- Blind Sports Australia
- Blind Welfare Association of SA
- Canberra Blind Society
- CanDo4Kids
- Guide Dogs NSW/ACT
- Guide Dogs Queensland
- Guide Dogs SA & NT Inc
- Guide Dogs Victoria
- Humanware
- Macular Disease Foundation Australia
- Quantum RLV
- Royal Guide Dogs Tasmania
- Royal Society for the Blind of South Australia
- Vision Australia

## **Executive Summary**

The Australian Blindness Forum broadly supports the overall direction of the Draft Report, however, contends that further consideration, specific action and more immediate timeframes must be applied to improving access for people who are blind or vision impaired.

Whilst the Draft Report has captured that ongoing improvements are required to achieve equity in access to public transport and associated infrastructure, we note there appear to be few recommendations stemming from this report that are concrete or with requirements for short-term achievement leading to real improvement.

In our submission to the 2012 Review of the Disability Standards for Accessible Public Transport 2002 (Transport Standards) Issues Paper, the Australian Blindness Forum acknowledged that there have been some improvements in some areas essential to ensuring Accessible Transport for people who are blind and vision impaired.

Our primary concern, however was, (and remains) the ongoing failure to achieve 'whole of journey' access. The lack of consistency across services and variation between infrastructure design and adherence to accessibility standards makes it very difficult for a blind or vision impaired traveller to utilise any services with confidence and ease.

Accessing and utilising public transport is essential for people who are blind or vision impaired to enable participation in education, employment, social and community activities.

In our previous submission, ABF proposed a number of principles and priorities which need to be considered and addressed by the Review to improve and enhance access for people who are blind and vision impaired. Whilst some of these proposals appear to have been given limited consideration, ABF does not believe the recommendations provided within the report adequately address our ongoing concerns.

We are disappointed that it would appear many issues similarly raised in submissions from other blindness sector organisations including Blind Citizens Australia, Guide Dogs Australia, Royal Society for the Blind and even National Disability Services have not been afforded adequate focus and attention in this draft report.

The Australian Blindness Forum contends that it is vital that the final report has greater consideration to the access needs of people who are blind or vision impaired and provides tighter timeframes and stronger accountability requirements to ensure achievement and enforcement of the current and future disability standards for accessible public transport.

We acknowledge the operational, logistical and financial challenges in meeting the Disability Standards for Accessible Public Transport, however, ABF is of the strong view that these challenges should not provide a reason for softening the standards or reducing compliance targets.

ABF has provided comments and suggestions on the Draft Report in this submission below.

## **Response to the Draft Report's Recommendations**

### **Recommendation 1 — National reporting on compliance**

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

The ABF is pleased that a national framework for reporting compliance will be established. We are concerned, however, that the implementation date is over two years away.

A significant concern, raised by a number of submissions to the issues paper, noted the difficulty presented in accurately assessing the compliance of transport providers with the existing DSAPTs, particularly given the lack of data available.

Users of public transport who have a disability have reported some improvements in some areas of accessibility, however, conversely reports of non-compliance and accessibility barriers continue to be received. Without the ability to compare anecdotal reports with actual compliance targets and achievement, it is difficult to undertake a factual assessment of the current compliance and determine whether continuing access issues are systemic or individual occurrences.

Whether a circumstance of access barriers is systemic, infrastructure-based or an individual failure to apply the standards, will determine the appropriate response to address, improve and remove barriers to access. In order to identify the cause and determine the most appropriate remedy, accurate reporting and compliance is vital.

### **Recommendation 2 — Modernise the Transport Standards**

*That the Australian Government, jointly with state and territory governments, commence a process for updating and modernising the Transport Standards...*

ABF agrees that the standards need to be reviewed in line with current best practice and the emerging advances. This is particularly relevant to the blind and vision impaired sector when considering the advances in technology enabling audio descriptions.

Inclusion of accessible information including in-flight entertainment should be considered as an addition to the amended and updated standards.

ABF reiterates our support for the submission to the Review regarding access to trams by The Royal Society for the Blind of South Australia. This report recommended that the Transport Standards be amended to include at least one tactile boarding point, with drivers being instructed to align the first door with the tactile boarding point.

Standards Australia is currently developing a Wayfinding standard as part of the review of Access to Premises in 2015. We would encourage the incorporation of those recommendations into the updated Disability Standards for Accessible Public Transport.

### **Recommendation 3 — The complaints process**

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

With respect, the recommendation provides no clarity on what will be done to address the systemic and long term barriers to people with a disability being able to efficiently and effectively raise concerns regarding accessibility, or actual instances of direct or indirect discrimination.

The current mechanisms are complex and place an extraordinary burden, in the form of personal stress and potential financial impact, on individuals who have a right to raise concerns. As indicated in our submission to this Review, ABF strongly believes that that the Disability Discrimination Act needs to be more prescriptive and enforce compliance with a greater focus on conciliation as opposed to a conflict-based resolution process.

### **Recommendation 4 — Whole-of-journey accessibility**

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

ABF is pleased to see this recommendation has been made. Our previous submissions have highlighted the lack of consistency between the application of Tactile Ground Surface Indicators, access to information and design of infrastructure across, not only states and territories, but across the various modes of transport themselves.

### **Recommendation 5 — National motorised mobility aid labelling scheme**

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

ABF supports this recommendation.

## **Recommendation 6 — National wheelchair accessible taxi compliance milestones**

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

ABF supports this recommendation, however, suggests that similar targets and monitoring be implemented to assess compliance with taxi requirements to carry Guide Dogs.

There are still far too many instances of passengers accompanied by a Guide Dog being refused service. Worryingly, there is significant anecdotal evidence that the rate of drivers simply passing by a passenger with a guide dog and refusing to stop is increasing.

## **Recommendation 7 — Review of Disability Access Facilitation Plan**

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

ABF welcomes this review and looks forward to being involved in these consultations.

In our response below, we have further clarified a number of areas relating to access to air travel and infrastructure. It is hoped that amended plans can provide greater consideration of whole of journey access to and within the terminals themselves in addition to addressing a number of continuing concerns regarding aircraft and amenity accessibility.

## **Areas within the Report that ABF contend require further consideration**

ABF acknowledges that the Draft Report identifies numerous areas across all transport modes requiring improvement to access. We do not intend to reiterate specific concerns highlighted in our May 2013 submission to the Review, however, we provide comment below in response to matters raised in the Draft Report that we believe require further consideration:

### **1. Use and Placement of Tactile Ground Surface Indicators (TGSIs)**

ABF is pleased to note the Draft Report's recognition that *“Correct placement was seen as critical to ensuring visually impaired or blind passengers could successfully navigate rail infrastructure and access conveyances.”*

We advise that correct placement and consistency of use of TGSIs is an important consideration across all modes of transport and associated infrastructure. Where installed along train and tram platforms, it is essential that indicators align with carriage doors.

In relation to installation at bus stops, the necessity for installation should be considered in each instance as alternative landmarks are often available to indicate the presence of a bus stop. The challenge in urban areas is primarily identifying which post, of many, is the particular post that identifies a specific bus stop.

## **2. Accessible Information**

Whilst improvements have occurred and are ongoing, there is a lack of consistency in the availability and method of provision of accessible information across various transport modes and states.

Technological advances through smart phone apps, interactive 'live' websites are increasingly beneficial, although it should be noted that there are currently no standards to be met regarding the accessibility of design of these. The utilisation of these apps, webpages and helplines, however, is dependent on an individual having access to often expensive technology and reliance upon the information available through these services being accurate.

## **3. Audible announcements**

The installation, operation and consistent use of audible announcements is a significant concern for people who are blind and vision impaired.

Audible announcements at the point of embarkation/disembarkation are essential in determining the destination, enabling the identification and location of the appropriate train, bus, tram or ferry.

With advances in technology, audible announcements on board all conveyances are eminently achievable. We contend that it is an inherent right of all passengers who are blind or vision impaired to be able to know where they are at any point in a journey.

The ability to know the current location, destination and upcoming stops increases the confidence and safety for a person who is blind or vision impaired.

Audible announcements are not only essential for people who are blind or vision impaired, it is known that they make the journey less stressful for all commuters.

Concerning is that ABF members report instances where there is current and existing capacity for audible announcements on a number of transport modalities, however, the functionality is not utilised.

## **4. Bus Accessibility**

ABF concurs with the recognition within the Draft Report that the improvements to bus accessibility, primarily through an increase in low floor buses, are regrettably hampered by continued access barrier to information, TGS placement and bus stop design.

We further agree with the Draft Report in noting that difficulties arise when agencies responsible for infrastructure design and upgrade have an inability to implement accessible design practices (usually due to cost implications). This makes improvements to bus design of lesser use if a person who is blind or vision impaired is unable to determine where the bus stop is, determine which bus routes stop at a particular stop and identify the approaching bus.

A cohesive oversight structure, upgraded standards, continued consultation with transport users and a coordinated approach to funding and monitoring of accessibility upgrades and installation will ensure that resources are allocated on a basis which will achieve the optimal compliance with accessibility needs of users.

Multiple interchanges continue to present significant challenges for passengers who are blind or vision impaired.

In addition, there is still too high an incidence of drivers going past stops if a passenger doesn't indicate despite the inability of someone with a vision impairment to identify and signal the appropriate oncoming bus in many instances.

Audible announcement of routes externally on buses would assist in identifying correct destinations.

The installation and operation of audible announcements en route during a journey are essential in determining the progress of the journey and identifying the appropriate stop for disembarkation.

ABF is concerned that the grant of the exception for accessibility compliance of school buses for 40 years is far too lenient and should be significantly reduced.

## **5. Train and Station Accessibility**

ABF concurs with the Australian Federation of Disability Organisations in broadly supporting the Australian Rail Authority Guidelines. However, the continued lack of consistency of use and/or availability of audible announcements on some train models and routes is concerning.

ABF would also like to see the updated standards include TGS1 marking on platforms, consistent design and consistent application. It is also essential that markers indicating carriage doors are correctly aligned.

We also seek consistency on automatic doors. They must not automatically open unless the carriage and door is correctly and safely aligned with a platform.

## 6. Tram Accessibility

Trams and platform accessibility should align with the requirements and standards applied to trains. These include installation and use of audible announcements at the platform in identifying the route of the tram and throughout the journey.

ABF noted that the introduction of extended tram carriages resulted in existing TGSIs on platforms no longer aligning with carriage doors. We understand that when this occurred in South Australia, the TGSIs were removed and have yet to be reinstalled in the correct location.

## 7. Taxi Accessibility

The Draft Report acknowledged that *“Inconsistent taxi driver service and assistance was a source of distress for people with disability including instances where drivers were unwilling to transport a person using an assistance animal.”*

Additionally, the Draft Report noted that *“Taxi vouchers also presented unique challenges to people who are vision impaired and there were frequent complaints that taxi drivers took longer routes or enlarged fares.”*

It is disappointing that there do not seem to be any recommendations or actions contained within the Draft Report to address these ongoing concerns relating to the taxi industry other than to note that *“further education is required”*.

ABF concurs that further education is required, however, we would assert that, coupled with ongoing education, appropriate enforcement and compliance, measures need to be in place so taxi operators are not only aware of their obligations, but are encouraged and required to abide by them.

ABF is concerned with the continuing reluctance (and in too many instances refusal) of drivers to carry Guide Dogs. Guide Dog users continue to report drivers refusing to stop and pick them up once they become aware of the presence of the Guide Dog.

ABF supports submissions received that recommended raised taxi registration numbers, required to be placed on the exterior of passenger doors, should also be provided in both tactile and braille forms on the inside passenger side of the vehicle. This would assist a person with vision impairment when entering the taxi and if there are concerns during the journey.

The increasing accessibility features of applications available to book and track taxis is pleasing. There does, however, need to be greater standardisation and compliance with accessible features as some applications are not fully accessible.

The trial of talking meters in Melbourne enabling passengers with a print disability to accurately obtain the cost of their fare has reportedly been successful. ABF looks forward to this advancement being included in all taxis across Australia.

Similarly, the United States has been trialling the use of talking EFTPOS machines in taxis, further enhancing equitable access for all passengers. ABF recommends that the Australian taxi industry also initiate a trial of this technology in our taxi fleets.

Communication with drivers is sometimes complicated by a lack of English language proficiency. This makes it challenging for the passenger to give and receive accurate instruction and information on their destination and the route taken.

There also appears to be an increasing reliance by drivers on GPS directions, which can often result in taking an indirect route. This can result in a person with a vision impairment being disorientated on even familiar routes and can potentially lead to exploitation through increased distance and, therefore, increase cost.

## **8. Ferry Accessibility**

ABF appreciates the challenges presented by the topography surrounding the majority of jetties and wharves and the use of 'gangplanks' to board and disembark ferries.

We also note that 'human assistance' is available to assist and that there is usually only one point of access to the vessel.

Installation and operation of audible announcements and consistent use of all ferries and routes is essential for a person who is blind or vision impaired to have equitable knowledge of the route, journey and destination.

## **9. Air Travel Accessibility**

ABF was pleased to note the Draft Report referenced the need for accessibility and equality through end-to-end journeys.

Despite this acknowledgement, one of the key factors in commencing an 'accessible' journey is the ability to be dropped off or picked up at a safe and convenient location at the airport.

ABF contends that it is essential that airports allocate appropriate kerbside locations for people with a disability to be dropped off and picked up.

We remain concerned with the continued 'caps' being placed on the number of people with assistance aids being permitted to travel on individual flights. This places unnecessary complications and restriction on groups, families or friends travelling together.

We are aware the majority of airline staff provide appropriate safety briefings and that safety cards are provided in braille where required. Unfortunately menus and entertainment guides are not available in accessible formats.

Inflight entertainment systems are not consistently accessible for people who are blind or vision impaired. ABF received reports that iPads were accessible, but then, inexplicably, those features were disabled. Following a complaint by the Disability Discrimination Commission, this facility was re-enabled.

This example raises questions as to why it was seemed feasible or appropriate to disable an existing accessibility feature and the overall culture towards creating an accessible and equitable experience.

Technology advances such as the increased use of 'apps' for booking and tracking flights are encouraging, however, there is inconsistency in the accessibility of these apps and features.

Point-to-point access to airport infrastructure through wayfinding and kerb drop off and pick up are essential areas of consideration for that review.

## **Conclusion**

Whilst the Draft Report provides a broad summation of a multitude of matters raised in submissions to the inquiry, ABF remains of the view that greater attention could have been given to exploring the concerns impacting upon people who are blind or vision impaired.

In noting the recommendations provided within the Draft Report, we are cognisant that recommendations and compliance targets stemming from previous reviews of the 2002 Disability Standards for Accessible Public Transport have not been comprehensively attained.

Essential to monitoring the application to, and compliance with, these standards will be the timely introduction of a National Reporting Framework and an effective and efficient complaints process.

Failure to action the recommendations within the report, or address a number of areas arguably not adequately considered within the report, will continue to leave in place barriers to accessing employment education, social and broader life opportunities for people who are blind or vision impaired.