



REFORM OF THE DISABILITY STANDARDS FOR ACCESSIBLE PUBLIC TRANSPORT 2002

Braille working group – revised options

December 2024

The Braille working group met three times between 4 July and 1 August 2024. The working group consisted of representatives from:

- Australian Braille Authority
- Guide Dogs Australia
- Blind Citizens Australia
- Vision Australia
- Department of Transport and Main Roads, Queensland
- Transport for NSW
- Department of Infrastructure, Transport, Regional Development, Communications and the Arts, Commonwealth

The working group has agreed the revised options for Chapter 15: Braille embossed (printed) specifications and Chapter 16: Braille and tactile lettering for signage, outlined below. Public transport operators and providers will be required to implement the requirements for Chapter 15 within 5 years from the date the amended Transport Standards come into effect. Public transport operators and providers will be required to implement the requirements for Chapter 16 for all new, additional or replaced signage brought into service on or from the date the amended Transport Standards come into effect.

The working group also discussed issues relating to the specifications in the National Construction Code and the Disability (Access to Premises – Buildings) Standards 2010 that relate to the grade of braille to be used on signage. The Department will consider methods to advocate for change to these standards to facilitate better outcomes for people with disability in the future. Further information is provided below.

Chapter 15: Braille embossed (printed) specification

Regulatory option

A new section will be inserted into Transport Standards Part 27 (Information) to include the following:

- If information is requested in Braille in a printed format, it must be provided in Grade 2 (contracted) format, unless the person specifically requests Grade 1 (uncontracted). Information should be provided in accordance with the criteria set out in The Rules of Unified English Braille by the International Council on English Braille and endorsed by the Australian Braille Authority.

- In situations where braille information is not made to order, then the information should be available in both Grade 1 (uncontracted) and Grade 2 (contracted) formats in separate volumes.

These requirements would apply to conveyances, premises and infrastructure. These requirements must be met when providing information to the public regarding public transport services.

Supporting guidance

Specific guidance may include:

- By producing both Grade 1 (uncontracted) and Grade 2 (contracted) braille, it is easy for readers to choose the format most suitable for them.
- To assist public transport staff, in cases where information is not made to order documents should be clearly labelled to indicate what grade of braille is contained in a document.
- Modern braille production software makes it easy to produce both Grade 1 (uncontracted) and Grade 2 (contracted) braille simultaneously, with little or no editing required. A table of contents near the beginning of the volume can alert readers to the inclusion of the two versions, and direct them to the relevant page for the version they wish to read.
- In some instances, passengers who have their own braille embosser may request an electronic copy of the publication or pamphlet so that they can then emboss (print) it themselves in their preferred grade of braille. To enable this, an accessible electronic copy of the publication should be available.

Chapter 16: Braille and tactile lettering for signage

Regulatory option

Transport Standards Section 17.6 Raised lettering or symbols or use of braille, will be removed and replaced with new requirements for braille and tactile sign design, consistent with requirements included in the Disability (Access to Premises – Buildings) Standards 2010 and the National Construction Code, including:

Braille and tactile signs

Where a braille and tactile sign is provided that is not required under Part D3.6 of the Premises Standards or covered under another specific provision within the Transport Standards, it must comply with the following:

- The entire sign, including any frame, must have all edges rounded.
- Braille and tactile elements on signs must be located not less than 1200 millimetres and not higher than 1600 millimetres above the ground or floor surface.
- Braille messaging shall be comparable to that in text or written information. Information contained in or represented by a pictogram must be rendered in words on a braille sign.
- The background, negative space or fill of signs must be of matte or low sheen finish.
- The characters, symbols, logos and other features on signs must be matte or low sheen finish.
- The background, negative space, and fill of a sign or border with a minimum width of 5 millimetres must have a luminance contrast with the surface on which it is mounted of not less than 30 per cent.

These requirements would apply to conveyances, infrastructure and premises (except premises to which the Premises Standards apply).

Braille design requirements

- Braille must be provided in Grade 1 (uncontracted) format, in accordance with the criteria set out in The Rules of Unified English Braille by the International Council on English Braille and endorsed by the Australian Braille Authority.
- Braille shall be in sentence case.
- Braille must be located 8 millimetres below the bottom line of text (not including descenders).
- Braille must be left justified.
- Where an arrow is used in the tactile sign, a solid arrow must be provided for braille readers.
- On signs with multiple lines of text and characters, a semicircular braille locator at the left margin must be horizontally aligned with the first line of braille text.

These requirements would apply to conveyances, infrastructure and premises (except premises to which the Premises Standards apply).

Tactile design requirements

- Tactile characters must be raised or embossed to a height of not less than 1 millimetre and not more than 1.5 millimetres.
- Title case must be used for all tactile characters, as well as:
 - upper case tactile characters must have a height of not less than 15 millimetres and not more than 55 millimetres
 - lower case tactile characters must have a minimum height of 50 per cent of the related upper case characters.
- Tactile characters, symbols, and the like, must have rounded edges.
- The minimum letter spacing of tactile characters on signs must be 2 millimetres.
- The minimum word spacing of tactile characters on signs must be 10 millimetres.
- The thickness of letter strokes must be not less than 2 millimetres and not more than 7 millimetres.
- Tactile text must be left justified, except that single words may be centre justified.
- Tactile text must be Sans Serif typeface.
- Tactile characters, icons and symbols must have a minimum luminance contrast of 30 per cent to the surface on which the characters are mounted.

These requirements would apply to conveyances, infrastructure and premises (except premises to which the Premises Standards apply).

Braille and tactile labels

Braille and tactile labels may be provided to assist with the use of devices or components. Where braille and tactile elements are used to label components, the requirements above of Braille and tactile signs, Braille design requirements, and Tactile design requirements, apply with the following exclusions:

- The entire sign, including any frame, must have all edges rounded.
- Braille and tactile elements on signs must be located not less than 1200 millimetres and not higher than 1600 millimetres above the ground or floor surface.
- The background, negative space, fill of a sign or border with a minimum width of five millimetres must have a luminance contrast with the surface on which it is mounted of not less than 30 per cent.

These requirements would apply to conveyances, infrastructure and premises (except premises to which the Premises Standards apply).

Supporting guidance

Specific guidance may include:

- Before deploying braille signage, operators and providers should undertake consultation and user testing to ensure information is relevant and accurate. This should include consideration of signage elements such as semicircular braille locators.
- To ensure information remains legible, operators and providers of braille signage should conduct regular inspections and perform maintenance works where required.
- Messaging on signs when provided in braille should consider critical information for the reader rather than a direct translation of text. This ensures information is succinct and provides the reader with clear instruction or information. Consultation and discussion with braille signage users and people with disability is necessary to develop a solution that retains functionality and legibility of the signage elements.
- For greater customer benefit and consistency, signs should be available in braille and tactile format where there is a feature such as accessible toilets or where there is a critical facility that requires identification, for example an information point.
- Longer text for instructions may warrant the consideration of an equivalent access solution to provide information in a contracted braille format. This may particularly be the case if time sensitivity is critical in receiving the information, such as in emergencies, where it is necessary to read multiple lines of text. This would need to be considered as part of an equivalent access process in consultation with braille signage users and people with disability.
- In some instances, the layout or space within a conveyance or public transport infrastructure or premise may constrain or prohibit the placement of signs in accordance with the requirements set out in the Transport Standards. Consultation and discussion with braille signage users and people with disability is necessary to develop a solution that retains functionality and legibility of the signage elements.

Issue for further consideration: Grade of braille to be used on signage and interactions with the National Construction Code and the Disability Premises Standards

The National Construction Code (NCC) and the Disability (Access to Premises – Buildings) Standards 2010 (Premises Standards) include a range of requirements for the design of braille signage. This includes specifications for the grade of braille to be used on signage. The majority of public buildings and facilities fall under the remit of the NCC and the Premises Standards, including many public transport buildings.

The working group has agreed to align the revised option for Chapter 16 with the NCC and Premises Standards requirements, however, the working group has identified and discussed concerns with the specifications requiring the use of grade 1 (uncontracted) braille on signage. The working group discussed how this requirement does not always reflect best-practice, is often unachievable due to physical constraints and is not informed by research or user-testing. The working group noted that due to these factors, braille signage is provided in inconsistent formats and varying standards of quality – an issue amplified when signage is imported from international suppliers. The working group highlighted that this is detrimental to braille signage users and was unanimous in recommending broad reform to the NCC and Premises Standards requirements.

Despite these concerns, the working group has agreed to align the revised option for Chapter 16 with the NCC and Premises Standards requirements. Members acknowledged that although this will not address fundamental issues with braille signage, practical challenges associated with misalignment with the NCC and Premises Standards prevent an alternative option being pursued at this stage.

Members noted that adopting the same requirements as the NCC and Premises Standards will provide regulatory certainty to operators and providers regarding their obligations, and prevent confusion that would

occur if the Transport Standards and Premises Standards had inconsistent requirements – particularly in instances where the two standards apply in close proximity.

As part of the revised option, guidance material will also be updated highlighting the importance and value of user-testing with braille signage users and people with disability. Guidance material will also include case studies to illustrate best-practice signage examples in a public transport setting. This will encourage operators and providers to consult with people with disability prior to procuring and deploying new signage. One suggestion put forward by the working group to address concerns regarding the grade of braille used on signage is that operators and providers could consider standard practices used in Canada, where braille signage in grade 2 (contracted) format is used where signage consists of 10 words or more. The opportunity to consult with braille signage users and people with disability regarding the use of equivalent access solutions is available to operators and providers where appropriate.

Noting the issues identified by the working group and recognising this outcome will not address broader issues with braille signage that goes beyond the scope of the Transport Standards, the working group recommended the Department advocates for broader reform to the Premises Standards and the NCC.