

Australian Braille Authority

Submission to

Reforms of the Disability Standards for Accessible Public Transport 2002

Stage 2 Consultation Regulation Impact Statement March 2022

Australian Braille Authority

The Australian Braille Authority (ABA) oversees the development and maintenance of braille codes and specifications used in Australia, acts as a braille accreditation body, and promotes braille as the primary literacy medium for people who are blind, deafblind, or have severe vision impairment.

We provide the following comments on sections 15, 16 and 17 of the Stage 2 Regularity Impact Statement on the Disability standards for Accessible Public Transport.

15. Braille embossed (printed) specifications

Sentences in quotes from the RIS document:

“Grade 1 (uncontracted) Braille is used for signage in Australia. It is a one-to-one representation of letters without the use of contractions (shorthand). Grade 1 (uncontracted) Braille is used on signs because the skill of readers will vary and cannot be anticipated.

The Premises Standards specify that Grade 1 Braille (uncontracted) should be used on signs, in accordance with the criteria set out in The Rules of Unified English Braille by the Australian Braille Authority. This is the easiest form of braille for readers and ensures maximum comprehension of the text.”

The ABA would like to clarify that Unified English Braille was developed by the International Council on English Braille (www.iceb.org). Australia is one of seven member countries who have adopted Unified English Braille, and the code is endorsed in each member country which includes Australia. The ABA is disappointed not to have been included earlier in the consultation phase for these accessible public transport standards.

“Inconsistent braille requirements and usage presents challenges to braille readers. If information is presented in braille formats other than Grade 1 (uncontracted), some users may be unable to access key journey information. This does not meet the varying needs of people with disability or provide accessible public transport services.”

The ABA would like to amend this paragraph to state that, although signs and other succinct spot readable information should be presented in Grade 1 as per the Australian premises standards, longer

texts should be provided in both Grade 1 (uncontracted) and grade 2 (contracted) braille to accommodate all levels of braille readers.

“Guide on good practice for the provision of information in braille formats.

Specific guidance may include:

- The standard of braille expected when information is provided in braille is in Grade 1 Braille (uncontracted) in accordance with the criteria set out in The Rules of Unified English Braille by the Australian Braille Authority. On request though, passengers should, in a timely manner, be supplied the information in their preferred braille format as per current requirements in Transport Standards section 27.1 Access to information about transport services.”

The ABA would like to amend: The standard of braille expected when information is provided in braille is in both Grade 1 (uncontracted) and Grade 2 (contracted) Braille in accordance with the criteria set out in The Rules of Unified English Braille by the International Council in English Braille and endorsed by the Australian Braille Authority.

A contents page should be included near the front of the volume to point readers to the Grade 1 and Grade 2 versions.

- “• Braille on service-related publications or pamphlets that are pre-prepared and supplied directly and randomly to passengers, should be of the easiest braille format to read. This is Grade 1 Braille (uncontracted). Grade 1 (uncontracted) Braille should be the default when materials such as pamphlets or publications are pre-prepared for the general public as it will be directly offered to readers of varying braille proficiency.”

The ABA would like to amend: This is Grade 1 Braille (uncontracted). Grade 2 (contracted) braille should also be offered for most braille readers in Australia. (delete the following sentence): Grade 1 (uncontracted) Braille should be the default when materials such as pamphlets or publications are pre-prepared for the general public as it will be directly offered to readers of varying braille proficiency.

It should be noted that the majority of braille readers in Australia prefer grade 2 for standard documents. Grade 1 Braille is very cumbersome and predominantly used for spot reading or signage.

Is it our view that the following paragraph is not necessary:

“Expert braille readers may find Grade 1 (uncontracted) Braille time consuming for longer publications, preferring the much more quickly read contracted formats. While this is understood, the legibility of pre-prepared publications and pamphlets for braille readers of only modest skills must be accommodated.”

The ABA endorses the statement that: If material is specifically requested in a grade of braille other than Grade 1 Braille (uncontracted) it must be supplied in the passenger's preferred grade in a timely manner. We however would recommend public transport providers supply information in both Grade 1 (uncontracted) and Grade 2 (contracted) braille to accommodate all braille readers.

With these amendments, ABA would support the regulatory option if both grade 1 (uncontracted) braille and grade 2 (contracted) braille were provided.

Our experience is that longer documents provided by transport companies e.g. airline safety cards have been provided in Grade 2 (contracted) braille. These would not be read by most braille readers in Grade 1 (uncontracted) braille owing to the volume and length of such a document in this format.

One of our ABA executive members writes: Generally I access public transport information using apps, or by Googling it. I personally wouldn't order public transport information in braille because of the risk of it going out of date by the time I came to use it. This would be especially true for things like bus or train timetables, an app would provide the most up-to-date information and there are many that are accessible to screenreader users.

Of course this isn't an option for everyone, especially people who don't use smartphones and would like to be able to read information on the go, so hard copy braille should always be an option for people who want it.

In situations where braille information is not made to order, i.e. the safety information booklets given to passengers on aircraft, then they should be available in both Grade 1 and Grade 2, with the covers clearly labelled as such, so that airline staff will know which type of braille to give to the passenger.

16. Braille and tactile lettering for signage

Sentences taken from the RIS document are in quotes:

"The Premises Standards specify Grade 1 Braille (uncontracted) in accordance with the criteria set out in The Rules of Unified English Braille by the Australian Braille Authority. This is the easiest form of braille for readers and allows for the maximum comprehension of the text."

The ABA would like to amend this to state that The Rules of Unified English Braille are set out by the International Council of English Braille and endorsed by the Australian Braille Authority. They are not written by the Australian Braille Authority, however we have representation on the International Council on English Braille which maintains these braille standards.

We are again disappointed not to have been consulted as the standards setting body for braille in Australia. The non-regulatory option provides the ability to keep signs relevant to the braille reader

e.g. “press the righthand button”, rather than the green button which has no meaning to a blind person who cannot see colour. We recommend the non-regulatory option provided that our amendment is included. We do have grave concerns that there are no standards for how information would be customized to make it relevant to a braille reader particularly given there has been no consultation so far.

17. Lifts: Braille and tactile information at lift landings

The ABA recommends the regulatory option. With consistent signage and standardized positioning of such signs, this would allow braille readers to know on which floor they exit a lift after they have taken their journey and know where to look for such a sign. The only problem with braille signage is if you don't know where it is, then it's no good to you. Unlike a print sign that leaps out at the viewer from across the room, braille signs are only perceivable up close. In other words, they have to be sought out. If you don't know that there is supposed to be a sign, then you won't go looking for one.

Our experience of signs at lift landings is not always positive. Often they are not maintained and dots are knocked off rendering the braille incorrect or unusable. Signs have been seen to be upsidedown or in the wrong braille code. Standardizing and consulting with appropriate bodies, such as the Australian Braille Authority, is most important in keeping lift braille signs usable.