

20 July 2022

Department of Infrastructure, Transport,
Regional Development, Communications and the Arts.
GPO Box 594
Canberra ACT 2601

**Submission: Reform of the *Disability Standards for Accessible Public Transport 2002*: Stage 2
Consultation Regulation Impact Statement.**

Centre for Inclusive Design (CfID) welcomes the opportunity from the Department of Infrastructure, Transport, Regional Development, Communications and the Arts, to provide feedback on the Reform of the Disability Standards for Accessible Public Transport Consultation Regulation Impact Statement. CfID strongly supports modernisation and reviewing the *Disability Standards for Accessible Public Transport 2002* and recognises the critical role of standards in affording equal and equitable access to people with a disability.

CfID notes much of the consultation and feedback has occurred in phase one and broadly supports the feedback provided by the community, advocacy groups and transport operators. The 16 key reform areas outlined in stage one of the reforms provided a sound foundation in drafting some of the current issues faced by people with disability who use public transport. While CfID welcomes the introduction of the 54 reform areas outlined in stage two, it believes, however, improvement should be made before transport ministers consider the reforms in May 2023.

In the following submission CfID has provided a recommendation on the design process and mobile web systems. Implementing these recommendations would help deliver consistent, predictable, safer and more accessible public transport for the maximum number of people with a disability who use public transport. As a not-for-profit design agency focusing on empowering edge users through Inclusive Design practice, CfID has made comments on the reforms most relevant to its expertise, particularly the design process itself.

CfID has categorised the submission under the relevant chapter headings. As requested by the Department, where relevant, preference has been given for status-quo, regulatory and non-regulatory reform. As a rule, all reforms made to the standards should be regulated, with minimum benchmarks for all providers and rideshare platforms. Regulation is critical in ensuring all Australians with disability can move independently through the community and participate with certainty in all social, economic and wellbeing activities without discrimination or additional costs.

Inclusive Design

To ensure any reforms made by the Department have a tangible impact on improving the accessibility of public transport for people with disability, CfID recommends adopting an Inclusive Design approach. Inclusive Design means accounting for the uniqueness and diversity of Australia's disability community and acknowledging one size does not fit all, rather 'one-size-fits-one'. It is an ongoing process, rather than a destination. It involves embedding human-centred design and requires continuous consideration and iteration as environments change.

Throughout the Transport Standards consultation process, recommendations to adopt Universal Design principles have been a frequent and widespread suggestion from the community. Universal Design differs from Inclusive Design as it provides a single solution to serve the most extensive possible user base without added accommodation for edge users. Inclusive Design differs as it focuses on exploring ways to support a full spectrum of people who make a user group, like the diverse groups of Australians with a disability who use public transport. Inclusive Design involves producing different solutions and processes for different groups of people rather than a one-size-fits-one approach.

Inclusive Design involves designing with, not for, edge users and mapping the user experience for a range of diverse consumers. Reforming the transport standards would involve designing with users who experience different types of challenges when using public transport. By considering and designing with diverse consumers, Inclusive Design will ensure public transport is accessible for all users, particularly those who are often not consulted or included in mainstream groups.

Digital Accessibility

CfID welcomes and supports the reforms incorporating accessibility requirements. As transport standards do not currently include any requirements around digital accessibility systems, providing information in accessible formats should be considered a high priority. CfID's preference is the regulatory option, as it is most likely to deliver tangible change and positively impact people with disability. The policy in the status quo option and the non-regulatory option provide licence for providers of public transport information to operate as a business as usual, which has historically resulted in content that does not meet accessibility requirements. The regulatory option will ensure public transport information providers are held accountable and, as a result, transport information will be accessible for all users.

CfID supports that in both option one and option two of the regulatory options, the information provided by an operator or provider to passengers in a mobile web format must meet WCAG 2.1 AA requirements as a minimum. WCAG guidelines, however, are routinely updated as technology and capabilities change, and the policy must reflect these updates. It will ensure, as new accessibility standards are released, web and mobile platforms across the transport information network are accessible for all users in the future. CfID believes the appropriate approach would be to future-proof the legislation by including successor standards. For example, the legislation referencing 'the most up-to-date version' or 'the successor of 2.1 AA WCAG'.

About Centre for Inclusive Design

Centre for Inclusive Design is a not-for-profit organisation working with organisations across several sectors, including government, education, business, and community. The organisation specialises in Inclusive Design, which is human-centred design and delivers products, services, and experiences accessible to and usable by as many people as possible. CfID's way of working emphasises the experiences of overlooked audiences in the traditional design process. It produces designs

addressing the needs of the broadest audience possible by giving visibility to the unseen and offering alternative perspectives.