

Reform of the Disability Standards for Accessible Public Transport: Consultation Regulation Impact Statement

Observations & input by Robert Plant

Chapter 4: Staff training and communication

4.3 Regulatory Option: In relation to dot point 5 & 6, make sure the person with the disability who is doing the training has the actual severity of disability being discussed, e.g., a person with the actual severity of mobility issues conducting mobility awareness training.

Chapter 5: Mobility aid safety

5.1 Nature and Extent of the Problem

It sounds good in theory, but to put this into practice, you need to consider the following: If you're looking at the whole journey for the person with the disability, who can get on new transport without discrimination, the fact that they have to be tied down and no other passengers are required to be restrained (seat belts etc), is discrimination in itself. It takes away from the persons independence to travel unassisted ie who is going to tie them down if they do not have a support person. Will it be the driver or an allocated person such as a guard? This is not only an invasion of privacy, it will also prolong the journey time for that service. And how does the person with the disability notify the driver they want to get off? The active restraining systems should be at the discretion of the person with disability.

Chapter 6: Priority seating

6.4 Regulatory option

1. Number of priority seats per conveyance

Minimum provision for conveyances should be four priority seats to accommodate seniors, pregnant women and people with disabilities. This allows for increasing numbers of seniors using public transport as they age.

Regulated Option

When you talk about priority seating, look at the NGR model in Queensland. They have a good model to base this on, such as contrast, symbols embroidered into seating etc. What I would like to strongly recommend is that currently it is up to the states to impose a penalty for persons who breach priority seating. I would like to recommend this becomes a federal issue to make it consistent and mandatory across Australia that penalties are applied and enforced.

4. Identification of passengers eligible for priority seats

The suggestion that people wear identification badges to identify their disability is very intrusive. I would like to see how the general public would respond to wearing name badges that state their name and medical issues.

Chapter 7: Allocated spaces in transit

When looking at measurements for allocated spaces, make sure you are up-to-date with the latest mobility devices. These are constantly changing (one device does not fit all).

Chapter 9: Lifts

In regards to lifts, refer to the model done by Cross River Rail (Queensland). A lot of work has been done by the accessibility reference group in regards to best possible practice.

Chapter 11: Communication during a service disruption

Regulated. I recommend all forms of communications are employed to get the information out there as quick as possible. Not everyone has the most up-to-date technology (phones, tablets etc) so older forms of communication (radio, signage etc) should still apply.

Chapter 12: Gangways

Agree with everything here, just need to take into consideration the different sizes of mobility devices (again, not one device fits all) and the incline needs to be 1:15 or better.

Chapter 13: Assistance animal toileting facilities

This is a good idea where viable. But while we're talking about toilets and accessibility, there should be some method for persons with disabilities to access toilets with a key if they are locked (e.g. in Brisbane where toilets are locked if the station is not manned as not all stations are manned)

Chapter 14: Emergency Egress

Great that this is being officially added to the standards. It's important to let the people with disabilities know what the policy is in case of emergency, they know what to expect. For example, it could be on the website.

Chapter 15: Fit for purpose accessway

Once again, take into account the sizes of different mobility devices. For example, if you have a 1200mm wide pathway with 2 scooters 800mm wide going in different directions, this will cause a holdup. If you increased the size to 1800mm, it would be good to have signage at each end asking people to stay left.

Chapter 18: Passenger loading areas

All drop off zones where possible to have a covered area (hot weather and rainy). When loading and unloading persons with disabilities as their carers will be subject to weather conditions. Once again, take into account the sizes of different mobility devices. For example, the kiss and ride and drop off zones should be long and wide enough to allow different size mobility aids.

Chapter 19: Provision of information in multiple formats

All formats communication should be considered. Each format can be catered for inclusive of all disabilities (blind, deaf, intellectual)

To create 'The Whole Journey', all categories will be regulated. This would add a lot of expense to the providers and operators of public transport. To compensate for this, the government should look at designating companies that are responsible for providing all the associated items etc so that providers and operators can get the cheapest prices and it's all centralised instead of each operator having to find separate companies for separate regulations.

Consultation Questions

The consultation Questions at the end of each Chapter are limited in scope and do not genuinely progress the changes needed in the new DSAPT.

If the government wants to achieve the whole of journey, they need to look at ways to eliminate undue hardship as an option. Look at interest free loans or a two-year implementation plan. For as long as you have undue hardship mentioned in the options you will never have complete whole of journey.