

VisAbility

Review of Transport Standards (NDS)

The following feedback is provided in response to the 17 areas of reform presented. These areas are based on consultation with the disability community, governments and the public transport authority.

Staff training and communication

- Whilst public transport providers and operators have a responsibility to ensure their staff are proficient in interacting with customers in ways that do not discriminate against people with a disability it is inferred.
- Public transport and the right to access this a human right. As such the delivery of all aspects of these services must be accessible including staff providing those services. As a public service this training and communication should be regulated via a performance requirement. This will then have a flow on affect for other areas of reform identified including digital information screen, website accessibility and communication strategies.
- A negative experience can significantly impact an individual with a disability's ongoing use of said service. Awareness is the key, however it must also be realised (as part of the training) that not everyone with a disability wants to receive assistance, or too much help. Many people also want to develop or be independent.
- Staff training for transport workers should be mandatory. Including assistance for Guide Dog users would be very useful. This awareness training should be done annually.

Mobility aid safety

- This specific relates to the transport of wheelchairs and aids for people with disability and restraining systems. However it should be expected to guide dog / assistance dog users. This should include waiting for such users to be seated before departing.
- Does consideration need to be made re: space requirements for guide dogs and other assistance dogs as these are essentially mobility aids? Whilst restraint systems are not required each dog type does require additional room under the passenger seat or other immediate area. (See next point re: priority seating). It

would be very useful to have a dedicated space for assistance dogs: there is a problem where there is not enough room under the seats in trains and buses.

- This needs to factor in the use of guide dogs / assistance dogs and the use of ramps on buses. Just as it is for users of wheeled mobility aids bus drivers should ask whether a guide dog / assistance dog user needs the ramp lowered. On occasions it has been assumed and a ramp has been lowered on top of the dog unexpectedly as the user cannot detect it being lowered on all occasions.
- Penalties should be considered for those who do not comply to safe practices.

Priority seating

- The current Transport Standards designate at least 2 priority seats. The disability community have suggested this is inadequate.
- Currently in WA it is commonplace to see up to 4 priority seats on most buses and trains so increasing to a minimum of 4 priority seats would be suggested.
- Further clarity would assist including having allocated spaces kept free & 'allocated' for those requiring them.

Allocated spaces in transit

- Allocated spaces generally refers to spaces for wheelchairs or scooters.
- Does consideration need to be made for guide dog users and the space required e.g. under seats fore and aft? (See earlier point)

Digital information screens

- There has been a rapid increase in the use of digital information screens since the introduction of the Transport Standards.
- There is ambiguity and uncertainty of what is required to be delivered to meet the needs of people with a disability and what is compliant.
- Digital signage should meet a set of standards based on the Web Content Accessibility Guidelines (WCAG) 2.1 (level AA minimum) and Australian Standards 1428.2 – 1992 re: letter height from various viewing distances.
- Be inclusive and ensure information is also audible. Lack of bus stop announcements are an obvious problem in WA and many cities.

- This should also factor in finishes of said signage to minimise reflective glare and when viewing in certain circumstance.
- Any digital information screen needs to be in large print for those who have low vision. There need to be clear explanations of the signage & what buttons correlate to, etc.

Lifts

- There is a misalignment between the lift accessibility requirements in the Transport Standards when compared to the Premises Standards and the National Construction Code. These should be brought into line to avoid ambiguity.
- Also noted limitations with inferior audible and visual indication requirements.
- When lifts are out of service due to maintenance or unplanned repairs this results in a denial of service for people with a disability. Alternatives need to be mandated and implemented to have a consistent approach.

Website accessibility

- The current Transport Standards do not reflect industry standards around minimum requirements for website accessibility.
- A baseline for website accessibility needs to be mandated. As per digital signage this should be set at the WCAG standard in force at the time of finalising the updated Transport Standard. At point in time this should be regulated to be WCAG 2.1 AA compliant.
- WCAG 2.0 does not cover access requirements for mobile devices. Given a significant percentage of passengers will be accessing transport related websites when in transit this needs to be taken into account. Hence WCAG 2.1 should be regulated.

Communication during service disruption

- The Transport Standards use the terms “general information” but does not define what this constitutes. Hence there is a lack of communication consistency across operators.
- Any communication via electronic means (e.g. SMS, email, push notifications) need to be accessible and WCAG 2.1 AA compliant. There should also be a

defined standard for print and electronic formats (e.g. RTF/Word, PDF, ePub) that take these into account.

- If communication is provided at a static point e.g. a bus stop there needs to be a method of accessing this information without a mobile device particularly for those in areas of poor reception. This can be as straight forward as an audio information button where the information is live streamed.
- Current guidelines do not give scope for new means of communication e.g. via push notifications, social media etc.
- There needs to be a consideration of the availability of communication in all formats including audio and AUSLAN.

Gangways

- This relates specifically to ramps connecting to pontoon wharves. Not relevant in WA and TAS as pontoon wharves not in place.

Assistance animal toileting facilities

- Absolutely essential - so important for assistance animal to relieve itself prior to public transport travel especially if commuting longer distances.
- Such facilities also need to have a continuous accessible path of travel to the transport facility or conveyance: some users of assistance animals use mobility aids as well.

Emergency egress

- The requirements for a customer to safely and easily exit transport infrastructure, such as a bus or train platform, in emergency situations is not explicitly covered. Also, the provision of safe egress is not well understood by operators, designers and people with a disability.
- This needs to be made clearer and made available to review prior to any journey being undertaken as part of journey planning.
- There needs to be a consistent approach regarding the egress from train platforms as some providers advise that egress cannot be provided via a ramp to the railway for safety concerns re: the risk of train derailments and how this would be impacted if a ramp to the train platform is in place.

- Any emergency egress needs to be dignified: it is not acceptable to suggest a customer with mobility needs to wait on a platform if the only emergency egress point is not viable e.g. a lift.

Fit for purpose accessway

- The Transport Standards do not specify requirements for fit for purpose accessways or how to accommodate pedestrian flows at peak times.
- A consistent nationwide approach needs to be implemented not only for these standards but for general use. Why do we not have a standard “stand left” rule and implement this outside of this standard?

Wayfinding

- Wayfinding provisions are fragmented and there are several gaps that impact on designers and managers creating a holistic wayfinding strategy.
- There is an identified need for more clarity regarding TGSIs and luminance contrast requirements along internal access paths and ground surfaces that form part of an access path.

TGSI

- Current Transport Standards do not include requirements for directional TGSI which impacts on access through transport precincts by people with vision impairment.
- This is definitely a requirement so that directional tiles are kept free for those customers requiring them. It is similarly important that loitering / covering the directional tiles doesn't occur. Definitely do not want use restricted by misuse by members of public not requiring such placements.
- The Standards should dictate a consistent approach of the use of directional TGSI from the point of entry to a transport facility to the actual conveyance. In Perth, WA for example a new facility was developed in accordance with these Standards and on the entrance level there are no directional TGSI leading to key wayfinding points and at the conveyance level there are.

Passenger loading areas

- There is no provision for the design and delivery of accessible passenger loading areas such as drop off / pick up points and taxi ranks.
- This should be mandated including the provision of appropriate accessible seating at the same locations.

Multiple formats of information

- There is no specific reference to providing information in other formats including through digital platforms.
- Needs to include compliance with WCAG 2.1 AA minimum.
- Apps must be regulated to ensure the same level of access across different platforms i.e. iOS and Android.
- Costs would be neutral if priority is made to providers have an accessible mobile, responsive site rather than rely on an app.