

**Submission on the Reform of the Disability Standards for Accessible Public
Transport: Consultation Regulation Impact Statement
April 2021**

Travellers Aid appreciates the opportunity to provide feedback on the Reform of the Disability Standards for Accessible Public Transport: Consultation Regulation Impact Statement. Travellers Aid supports any effort that creates a more inclusive and accessible transport network.

Travellers Aid is a not-for-profit organisation that empowers people with travel related challenges to connect, engage and participate with their community. Every year we provide over 200,000 instances of travel assistance to our users through personal care, buggy services, our companion service, disability services and emergency relief program. Travellers Aid is the only provider of such services in Victoria. 90% of our service users say that without Travellers Aid they would struggle to connect to the places they want to go.

We will be providing feedback on Chapter 4: Staff training and communication, and Chapter 11: Communication during a service disruption. Please see below for our recommendations and comments:

Chapter 4: Staff training and communication

Travellers Aid advocates for the regulatory option and agrees that disability awareness training is a key component of providing accessibility in public transport and other sectors, providing the training guidelines are flexible and do not become too prescriptive or overly ambitious to the point where it negatively affects transport providers, as well as people with disability. As disability is very varied, a “one size fits all” training has its limitations and does not necessarily lead to the best outcomes for people with disability. We strongly advocate for broad awareness raising training complemented by a variety of more specialised skills training which may be role specific.

Travellers Aid, in conjunction with William Angliss Institute, has developed an online disability awareness training program. We currently ask all our staff and volunteers to complete this training at the beginning of their career with Travellers Aid. The disability awareness training provides our workforce with a better understanding of a wide range of disabilities including how to meet the needs of people presenting with disabilities. The training is designed to encourage better communication with anyone who has a disability, whilst at work or in their everyday life.

Our service users highlighted the following scenarios where staff training and/or communication could be beneficial:

- Train drivers do not provide a ramp if the train is too busy, possibly due to a lack of training and/or awareness of designated spaces for people with disabilities.
- Drivers forget that there is a person with a disability travelling and miss their stop.

- People with vision impairments are guided incorrectly, resulting in delays, uncertainty, and possibly injuries.

Chapter 11: Communication during service disruption

Travellers Aid prefers the regulatory options and believes that access to timely and accurate information during a planned or unplanned disruption will build confidence in travelling passengers and ultimately benefit all transport providers.

Some feedback we have received from our service users regarding unplanned or planned disruption includes:

- If a train changes platform at the last minute, there is insufficient time for a person with disability to be able to change platforms.
- Exits from train stations were too far away from the accessible bus replacements.
- Bus replacement services are often not accessible and are not suited to mobility scooters.
- Travellers Aid routinely fills gaps where a train is cancelled, or the platform has changed, and customer service staff contact our Connection Assistance Service to provide last-minute assistance.
- Service users have experienced instances where alternative transport arrangements during a disruption have not been organised in a timely manner.
- Service users have been told by public transport provider staff that they are required to organise their own alternative transport during a disruption.

Service disruptions can pose a significant challenge to people with disability for a variety of reasons however some of the common themes are a lack of information about accessible transport options and alternative arrangements.

A regulatory requirement will provide for the establishment of clear framework with practical, ready to implement guidelines that will provide staff at all levels of the public transport sector with accurate information about their duties and responsibilities during a disruption.

Conclusion

In conclusion, Travellers Aid would like to reiterate their support for implementing a regulatory approach, particularly regarding Chapter 4: Staff training and communication and Chapter 11: Communication during a service disruption.

We thank you for the opportunity to contribute to the Reform of the Disability Standards for Accessible Public Transport: Consultation Regulation Impact Statement.

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