

**NDS Submission to:
Accessible Public Transport: Consultation
Regulation Impact Statement
Transport Standards Review 2021**

About NDS

National Disability Services (NDS) is the peak body in NSW and Australia for non-government disability service providers. NDS has over 1,100 members across Australia. NDS provides information and networking opportunities to its members and policy advice to State, Territory and Commonwealth governments. We have a diverse and vibrant membership, comprised of small, medium and larger service providers, supporting thousands of people with disability. Our members collectively provide the full range of disability services, from supported independent living and specialist disability accommodation, respite and therapy to community access and employment.

NDS is committed to improving the disability service system to ensure it better supports people with disability and their families and carers, and to building a more inclusive community. This submission is based on consultation with members across Australia and includes some specific examples gathered from the disability sector and people with disability by our Western Australian office.

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Executive Summary

National Disability Services (NDS) welcomes the opportunity to provide input into the Accessible Public Transport: Consultation Regulation Impact Statement (Consultation RIS.)

This Consultation RIS includes regulatory and non-regulatory reform options for nominated areas of the Disability Standards for Accessible Public Transport 2002 (Transport Standards).

NDS strongly supports the ongoing review and modernisation of the Transport Standards. Transport is an essential service for people with disability to achieve full social and economic participation in the community. The Transport Standards provide governments with opportunities to significantly enhance the public transport experience of people with disability, build their economic and social inclusion, and assist in delivering many of the policy aspirations and pillars of the National Disability Strategy.

NDS's consultation with the disability sector and individuals with disability highlights user experiences and reiterates the need to ensure the Transport Standards align with actioning the principles of the National Disability Strategy along with the various mechanisms employed by States and Territories to implement the National Disability Strategy (as well as the Access to Premises Standards), to create inclusive and accessible communities.

NDS remains concerned however that there remains a lack of accountability for implementation of the Transport Standards. The Consultation RIS notes that there is limited data on the success of the Transport Standards in achieving their aim of removing discrimination from transport provision and that reporting compliance against the Transport Standards is not mandatory.

As in previous reviews of the Transport Standards, NDS acknowledges that significant investment over time is required to bring all aspects of the infrastructure up to standard and that most jurisdictions have been actively involved in investing in more accessible transport.

Given the commitment to the National Disability Insurance Scheme (NDIS), NDS believes it is even more critical that all Australian governments continue to reinvigorate investment in mainstream services such as transport to improve outcomes for people with disability.

It has been almost 20 years since the Standards were established. We must begin to judge them from the perspective of how they achieve their underlying purpose and therefore whether people with disability are able to use public transport. This must include consideration of the impact of the exclusions and exemptions, and of the gradual implementation timetable, and of the interface with other supports.

There needs to be stronger leadership from all Australian governments as drivers for change with respect to the transport industry and implementation of the standards. Most notable has been the lack of any effective development and implementation of a National Framework for reporting on progress against the Standards.

NDS urges all governments to implement Transport Standards and to work in partnership with people with disability, the disability sector, local government, public transport and road authorities to ensure the delivery of a fully accessible and responsive transport infrastructure communities.

The importance of a 'whole of journey approach'

A key issue raised by the sector is that there must be consideration of a holistic whole of journey approach to the better implementation of the Transport Standards. This requires that accessible provision of transport services is consistent and reliable. Many previous reviews of the Transport Standards have confirmed that the experience of people with disability using public transport significantly impacts on both their confidence in public transport and their likelihood of using it. Confidence is an important indicator of accessibility. If certain characteristics of a public transport system diminish the confidence of people with disability in using the service, then discrimination remains.

A lack of whole-of-journey accessibility prevents people with disability from using the accessible transport options available. Door to door, all components of a journey must be accessible in order for the journey to occur. Fully accessible public transport and pedestrian infrastructure are also critical for people with disability and enable whole-of-journey accessibility.

Footpaths, roads, bus stops and other local government infrastructure must be accessible. Problems that inhibit people with disability accessing public transport include uneven and/or narrow footpaths, inadequate lighting and inadequate shade and rest areas.

It is pleasing to see that jurisdictions such as NSW are implementing a whole of journey approach in developing their [Disability Inclusion Action Plan](#).

Consideration should also be given to progressing the installation of Changing Places facilities on major transport networks wherever possible, particularly on those routes that lead to major public infrastructure including stadiums and tourism and national park facilities. These secure and private facilities for people with disability provide extra space and assistance to use the bathroom but do not replace standard universal accessible toilets.

The public transport experience

The Transport Standards need a stronger commitment to principles of universal design.

Despite progress made by jurisdictional transport agencies, people with disability continue to report inaccessible infrastructure in the public transport system. For example, consultation undertaken by NDS in WA with people with disability and the sector highlighted issues including:

- too-large and uneven gaps between train and platform.
- train doors open for insufficient time.
- lifts out of service for long periods of time and insufficient contingency plans for access for either planned or unplanned disruptions. An example of this is at Bassendean station on the Midland line in WA. A person reported catching the train from Perth to Midland one evening after work and were advised that the line ended in Bassendean due to track works. The platform is below ground level and when they got off the train and attempted to use the lift to access the replacement bus being offered was advised that the lift was broken. The staff were unable to assist, as there was no contingency plan, and their only option was to get back on the train going towards the city and get off at another stop. This stop was not offering the replacement bus service however, and they had no way of getting home.
- for bus routes that are not yet fully accessible there is no system of knowing in advance the timing of the next accessible service.
- the use of inaccessible buses in place of trains when there are service disruptions. On a number of occasions, people with disability report they have been unable to get home as they have gone to access a replacement bus to find out that it was inaccessible.

- issues with bus ramps regularly failing. People with disability have reported significant delays whilst waiting for an accessible service and that on some occasions, ramps have broken whilst the person was already on the bus and they could not get off.
- bus operators not consistently responding to the different needs and capacities of users when boarding vehicles and being safely seated or positioned before the vehicle departs.
- paid parking systems at train stations can require significant walking from private vehicle to train station and back to buy and display the parking ticket.

In Tasmania, there continues to be significant issues with access to bus services. While the number of accessible buses available to service general access routes has continued to grow, the availability of accessible services remains limited even on the most commonly accessed bus routes. Stakeholders indicate they cannot yet rely on the public bus system as their preferred form of public transport. For example, people requiring physical access report that even where there is an expectation that a service will be accessible, it is can be the case that the bus supplied for the service on that route is not accessible, forcing the user to either cancel travel plans, wait for another service or rely on WAT services.

People with disability also report significant variances in availability of accessible public transport options based on geographic location. Even where there has been investment in a jurisdiction this investment is often concentrated on more metropolitan routes or areas.

Public transport must also accommodate the needs of passengers with sensory impairments, as well as those with physical impairments. For example, people with visual impairment require audible announcements not just in train services but also in accessing and using buses. Buses should have automated speech systems which activate when the bus doors open, announcing and repeating the bus number clearly and consistently several times. Audible announcements providing information about the buses location throughout the journey enable passengers with visual impairment to identify and exit the bus at their destination. These measures benefit not only passengers with disability, but also tourists and people with low English literacy skills.

Trained and skilled transport operators

A repeated theme in consultations with people with disability and also in academic research is that the attitudes, care and demeanour of transport staff strongly influence people's experience of public transport. Specifically, poor experiences of staff behaviour, even where unintended, can undo the benefits of the accessibility provided in the physical design of the system. The importance of the skills and attitude of staff is underlined by the fact that in many circumstances accessibility and information relies on direct assistance from staff. For example, in its Disability Inclusion Action Plan, [Transport for NSW](#) identifies that there will need to be a significant reliance on direct assistance from staff until 2028 (at least).

Accessible public transport infrastructure and systems must also be supported by skilled transport operators to ensure that systems are used in ways that meet the needs of people with disability. For example, rapid braking and acceleration of trains and buses can create hazards for wheelchair users and less ambulant passengers and should be minimised.

Passengers with disability and disability service providers report a lack of clarity and inconsistency between operators regarding the level of assistance that can be expected from bus drivers, such as with boarding and securing baggage.

There should be stronger commitment to the development of a consistent, enforceable and publicly accessible Code of Conduct for public transport operators that includes disability awareness, information and support to be provided, vehicle stability, gentle acceleration and braking, and ensuring passengers have sufficient time to sit.

Accessible information

For a transport system to facilitate access, it needs to ensure that all passengers can locate their travel path successfully and with as little effort as possible. Accessible information is essential before and during journeys for passengers to complete their journey. This includes but is not limited to transport schedules, ticketing details, boarding directions, disembarkation locations, accessibility features, reduced walking, fewest changes, and the fastest route.

NDS recommends that the development of a fully accessible web-based passenger information resource and journey planner app be included in jurisdictional Transport Plans to improve the provision of consistent and reliable service information to all passengers.

Co-design with people with disability

NDS supports consultation with groups representing people with disability to better inform the Transport Standards. Initiatives such as the Bus Stop Accessibility Works Program (BSAWP) and the subsidy programs available in WA to support the development of accessible bus stops are welcomed.

People with disability, as well as other community members, require safe places to wait, such as centre islands when crossing busy roads. NDS notes that the placement of dropped kerbs into intersections in some jurisdictions is often at variance with best practice in disability transport training, which emphasises using the shortest path across an intersection. Pedestrian cycles at signal-controlled crossings can be variable, allowing insufficient time for safe crossing and do not offer a control button in the centre of the road for people who are unable to complete the crossing in the allotted time.

NDS recommends that the Transport Standards commit to pedestrian safety through a structured process to develop and deliver best practice in safe pedestrian crossing infrastructure. Specific goals and a reporting framework to deliver accessible pedestrian infrastructure should form part of the Transport Standards.

On-Demand Public Transport

Transport disadvantage for people with disability occurs where those members of the community are not able to access either public or private transport to get to where they need to go. Compounding sources of transport disadvantage include low income, geographical isolation and high costs associated with alternative transport services such as taxis and modified private vehicles. Additionally, people with disability living in the urban fringe are more likely to experience difficulties accessing scheduled public transport, and therefore may be dependent on on-demand public transport.

Future transport networks need to give greater consideration to the role of on-demand public transport in meeting the needs of people with disability. An inadequate supply of wheelchair accessible taxis is a significant barrier to people with disability using on-demand public transport.

Jurisdictional transport strategies, supported by the Transport Standards, need to ensure that people with disability have access to a mix of transport modes. These should include:

- development of a strategic taxi fleet plan that progressively increases the number of universally accessible vehicles as a proportion of the total taxi fleet. This is particularly important in a jurisdiction such as Tasmania where wheelchair accessible taxis are an important transport solution for people with disability in the absence of any no urban or intercommunity trains, trams and light rail. People with disability wishing to travel independently within urban areas and between communities are adversely affected by the lack of alternative modes of transport. This is especially the case where people are unable to access other forms of public transport, for example, outside of major metropolitan centres and where there are no or very limited bus services. The provision of accessible taxi services is of therefore of critical importance to people with disability, particularly people with physical disability who use wheelchairs that cannot be safely transported in a conventional taxi vehicle. Additionally, with a small population, viability is a particular pressure point for small public transport operators such as taxi operators and drivers.
- a commitment to the continuation of taxi user subsidy scheme for people with disability and that these subsidies are recognised in other forms of on-demand transport available;
- ensuring that app-based ride sharing services are part of the transport mix and commit to a regulatory framework that promotes access and safeguarding of people with disability.
- planning for the inclusion of driverless vehicles in the future of Australia's transport network. Self-driving automation holds transformative potential for people with disability who are currently unable to drive and NDS welcomes government initiatives that facilitate the introduction of this technology.

In summary, the Transport Standards need to embed stronger commitment to:

1. Principles of universal design as a key feature of transport networks;
2. The development of a consistent, enforceable and publicly accessible Code of Conduct for public transport operators which includes disability awareness, information and support to be provided, vehicle stability, gentle acceleration and braking, and ensuring passengers have sufficient time to sit;

3. Include the development of a fully accessible web-based passenger information resource and journey planner to improve the provision of consistent and reliable service information to all passengers;
4. Commit to pedestrian safety through structured processes and investment to develop and deliver best practice in safe pedestrian crossing infrastructure and include specific goals and a reporting framework to deliver accessible pedestrian infrastructure;
5. Acknowledge the role of on-demand public transport in meeting the transport needs of people with disability through a strategic taxi fleet plan that progressively delivers a fleet that is universally able to accommodate all people including those with disability;
6. The continuation of subsidised travel for people with disability;
7. Reference app-based ride sharing services as part of the transport mix;
8. Promote initiatives that facilitate the introduction of self-driving automation (level 4) technology.
9. A regulatory framework that promotes access and safeguarding of people with disability throughout the Transport Standards.

Comment on Reform Areas

1. Whether mandatory requirements for staff training will improve the public transport experience of people with disability

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 disability.

The document related to this Consultation RIS states that a number of public transport operators and providers already train their staff in disability awareness. However, public transport staff interactions with people with disability indicate there is scope for significant improvement. Sometimes wellmeaning but ableist comments are made such as, “what happened to you”, “you’re too young to be disabled” “is that permanent? Shame”.

A proactive approach to supporting passengers with disability should form part of training. People with disability indicated they have mixed experiences when they interact with frontline staff and employees of public transport networks. Whilst many are fine, it’s always incumbent on the person with disability to ask for information or assistance. There is rarely a broad question such as “How can I help?”. Things like money handling or showing a companion card are often poorly handled. Quite often a bus driver will not check whether the person with disability is in position before taking off and rarely asks where they get off, leaving them to yell out or ask a passenger for assistance.

Furthermore, this training should be extended to the wider public even though there is advertising room on trains and buses to educate the reasons why the priority seats are so important for people with disability.

NDS consultations with people with disability and the disability sector indicate that training should be a mandatory and ongoing (at least annually) requirement and include assistance for Guide Dog (and other assistance animal) users.

Training and communication for transport operators and staff 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.

2. If further information on safety measures is required to better contain the movement of mobility aids on buses, light rail and trams while they are in motion

This specifically relates to the transport of wheelchairs and aids for people with disability but should also include guide dog/assistance dog and animal users.

A floor with significant grip should be mandatory for all transport modes or alternative safety restraints provided. People with disability report they would gladly use a restraint if it ensured bus or train safety however it is important that this is able to be used independently and does not impede embarking or disembarking.

People with disability report more significant issues on buses and that safety would be improved by ensuring that there was a tie down point for wheelchairs or other mobility aids as featured on many buses in the US along with measures such as waiting for such users to be seated before departing.

There should also be consideration given to the space and access requirements for guide dogs and other assistance dogs/animals. Whilst restraint systems are not required, each dog/animal requires additional room under the passenger seat or other immediate area. It would be very useful to have a dedicated space for assistance dogs and bus drivers should routinely check whether a guide dog/assistance dog user needs the ramp lowered.

Penalties should be considered for those who do not comply with safe practices.

3. Changing the way we calculate the number of priority seats required on a public transport vehicle to accommodate the increasing numbers of passengers requiring priority seating

People with disability report:

- That often there is not enough priority seating. The current Transport Standards designate at least 2 priority seats. Reports indicate that the demand for priority seating is increasing and that even where additional seating has been allocated (4 priority seats is common) this is inadequate. Research, including usage and demand data, would assist in finding the correct balance of priority seating to other seating.
- That further clarity would assist including having allocated spaces kept free and 'allocated' for those requiring them.
- Issues with identifying, reaching and accessing priority seats on buses, trains and trams.

4. If further clarity is required to ensure allocated spaces are clear of obstructions and functional and are exclusively reserved for mobility aids

People with disability highlight that this issue tends to be more significant on buses where there is more likely to be limited space for mobility aids or prams. However, accessing both buses and trains at peak periods (for example at end of the school day of a school day when the bus is full of students) can be difficult.

Allocated spaces in transit generally refers to spaces for wheelchairs or scooters. However, consideration needs to be given to the needs of guide dog users and the space required, e.g. under seats fore and aft.

If the Transport Standards are amended to better accommodate space requirements, then the information needs to be fed back to transport vehicle manufacturers and supply standards incorporated in supply chain processes and specifications.

Buses (and more recently, trains as well) are also often fitted with seats that fold up in the accessible zones. These seats are incredibly difficult for people with disability to put up and they regularly need to ask the bus driver or a passenger to assist.

The importance of community education around access to allocated to priority seating is reiterated.

5. How to ensure digital information screens and design requirements meet the needs of people with disability

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 concerning what is required to be delivered to meet the needs of people with a disability and what is compliant.

Mandatory and extensive consultation with people on all spectrums of disability should be a requirement of design and be included in the Transport Standards. This is particularly important for those with vision impairment and people with intellectual disability regarding processing of information.

The Transport Standards should be digitally inclusive and comply with jurisdictional digital inclusive policy. Some key considerations include the following:

- 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 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 and what buttons correlate to.

6. Amending lift accessibility requirements to align with the Premises Standards 2010 and the National Construction Code and to include maintenance provisions

This is supported taking into consideration the following provisos and experiences.

There is a misalignment between the lift accessibility requirements in the Transport Standards when compared with the Premises Standards and the National Construction Code. These should be brought into line to avoid ambiguity.

Automated voice recognition should be a standard. Also noted are 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.

7. Adopting a minimum standard for website accessibility to improve the delivery of service information to people through online systems

This is supported. The current Transport Standards do not reflect industry standards around minimum requirements for website accessibility. They should be digitally inclusive and comply with jurisdictional digital inclusive policy.

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.

8. Establishing a framework for public transport operators and providers to communicate effectively, and in a variety of formats, during planned and unplanned disruptions

This is supported and critical to ensure that people with disability can use transport modes confidently even in times of disruption. The Transport Standards use the term “general information” but do not define what this means. Hence, there is a lack of communication consistency across operators.

Disruptions to public transport are inevitable, however communication strategies should consider how best to convey messaging to people with disability when alternative arrangements are made. These arrangements should also be accessible to people with disability.

Any communication via electronic means (e.g. SMS, email, push notifications) needs 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 also needs to be a consideration of the availability of communication in all formats including audio and AUSLAN.

Disruptions also need to take into account unplanned issues with access and communicate this effectively both to passengers but also to front line staff. Many train platforms are only accessible via stairs/lifts. If the lift is broken and there is no back up, the platform cannot be vacated. If a platform is required to be accessed via lift, more than one should be available in case of a fault. Staff will also play an important role in supporting passengers with disability to minimise the impact of the disruption.

9. How to clarify the distinct requirements of gangways used to access ferries including the effects of tidal changes on access

The codesign of such access facilities with people with disability may assist in identifying the requirements where ramps are connecting to pontoon wharves.

10. Including requirements to provide conveniently located assistance animal toileting areas within, or adjacent to, key public transport infrastructure

It is important that the Transport Standards reflect the needs of all people with disability as much as possible.

Assistance animal toileting facilities are absolutely essential – it is critical for an 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.

11. Developing emergency egress provisions for people with disability in relation to public transport infrastructure

This is supported. The requirement for a customer to safely and easily exit transport infrastructure, such as a bus or train platform, in emergency situations is not explicitly covered in the Transport Standards. Also, the provision of safe egress is not well understood by operators, designers and people with a disability.

Contingency plans must be established to support people to exit in case of emergency. 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.

Emergency egress also 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.

12. Including requirements so ramps and walkways provide fit for purpose accessways during peak times and emergency egress, and to deter their misuse as stopping areas

The Transport Standards do not specify requirements for fit for purpose accessways or how to accommodate pedestrian flows at peak times, including requirements related to this is supported. A consistent nationwide approach needs to be implemented not only for these Standards but for general use. A standard “stand left” rule could be considered and implemented outside of this standard.

Co-located ramps/stairs are always a logical option and preferred. There is a preference, almost always, for a ramp to a lift as it is always guaranteed to be operational.

All railway station platforms must be level with incoming and outgoing locomotives.

13. How to address inconsistencies between the Transport Standards and the National Construction Code for wayfinding

Wayfinding provisions are fragmented and there are several gaps that impact on designers and managers creating a holistic wayfinding strategy.

Wayfinding standards should form part of the Access and Premises Standards and the Transport Standards. NDS has previously provided comment on how the current Access and Premises Standards can be strengthened for this to occur.

Linking accessible wayfinding and accessible navigation is critical for people with disability. Accessible wayfinding is the process of finding routes between pairs of locations that is accessible and is often used for pre-trip planning. Accessible navigation is the process of determining the current location of the user on an accessible route and providing step-by-step instructions for navigation along the route.

These should give specific guidance, for example, on the design and installation of static signage to assist people who are blind or have low vision to navigate the built environment. The main body of the Transport Standards should provide detailed examples and measurements for the design, location and installation of tactile signs at building and site entry points and for rooms and facilities. They should also be a compulsory part of the National Construction Code from 2022, so that they are understood and incorporated into design briefs.

They should provide good context on the:

- Introduction to Wayfinding (the objectives of good wayfinding, making wayfinding an integrated system of directions, including hints in the architectural design and the importance of making pre-visit information available).
- Orientation and mobility (guidance on the impact of blindness and low vision and the design principles which best assist in good wayfinding).
- Guidance on signage design and illustrations of signage placement
- Font and pictogram examples.
- Raised and tactile maps (location, design and placement).

14. If clarity is required about the use of directional tactile ground surface indicators (TGSi) in public transport environments

There is an identified need for more clarity regarding TGSi and luminance contrast requirements along internal access paths and ground surfaces that form part of an access path. Current Transport Standards do not include requirements for directional TGSi which impact 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 does not occur.

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.

15. Including requirements for the design and delivery of accessible passenger loading areas such as drop off/pick up points and taxi ranks

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

This is a significant issue in built up areas, airports and some transfer stations both in terms of quantity of designated drop off/pick up points, signage and public education with respect to designated use.

16. Including provisions ensuring public transport information is provided in multiple formats and not solely through online methods

People with disability should have access to all formats and not be disadvantaged.

There is no specific reference to providing information in other formats including through digital platforms. The Standards should include compliance with WCAG 2.1 AA minimum.

In addition, apps must be regulated to ensure the same level of access across difference platforms i.e. iOS and Android.

Costs may be more neutral if priority is made to providers having an accessible mobile, responsive site, rather than rely on an app.

17. Aligning the Australian Standards references in the Transport Standards with current Australian Standard reference.

Consistency in standards allows better messaging of minimum requirements across many domains, including planning and across levels of Government and is supported.

