

Vision Australia submission



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

To: Commonwealth Department of Infrastructure, Transport, Regional
Development and Communications –
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Introduction

Vision Australia is providing a response to the Draft Regulation Impact Statement because access to public transport is one of the most important – and challenging – areas of community participation for people who are blind or have low vision. While the Disability Standards for Accessible Public Transport (“the Standards”, “the Transport Standards”) have undoubtedly led to an overall improvement in the accessibility of public transport, there continue to be significant challenges caused by rapid changes in public transport conveyances and infrastructure that have largely outstripped the scope of the Standards. The current reform is overdue and much needed.

Given the importance of accessible public transport and the significance of the current reform, we are disappointed in the way the consultation around the Draft Regulation Impact Statement has been managed.

Firstly, the timing of the consultation has been problematic coinciding as it does with the Second Review of the Premises Standards. People with disability, and the organisations who support them, already experience “consultation fatigue” that is often not alleviated by evidence of resultant change, and organisations have limited resources to devote to simultaneous reviews. The fact that there are still many aspects of the COVID-19 pandemic that are contributing to the overall stress experienced by people with a disability appeared not to be taken into account.

Compared with the consultation process for the Second Review of the Premises Standards, there have been few opportunities for the disability sector to contribute to the consultation on the Draft Regulation Impact Statement.

We strongly recommend that the Department inform itself about how the Premises Standards consultation was undertaken, and adopt a similar model for future consultations about the Transport Standards.

We were not surprised to read in the Department’s consultation paper that, referring to the National Accessible Transport Steering Committee and the National Accessible Transport Taskforce, “Collectively these bodies include representatives from the disability community ...” Our experience over the past decade is that there has been little if any consultation with the blindness and low vision sector more broadly to inform either the Committee or the Taskforce. If the Standards are to remain credible, relevant and effective, there must be more meaningful and ongoing consultation with the blindness and low vision community than is occurring at present. The issues that people who are blind or have low vision are facing when accessing public transport are becoming increasingly diverse and complex, and it

is dangerous and unrealistic to proceed on the basis that one or two people have the expertise or experience to identify all the issues and develop solutions that capture this diversity and complexity.

Finally, we are once again compelled to condemn the ongoing systemic failure to make Australian Standards accessible to people who are blind or have low vision, including staff in organisations such as Vision Australia. The blindness and low vision sector first collectively raised this issue with Standards Australia at a meeting in 2009. Australian Standards, such as those that are referenced in the Transport Standards, are not available in formats that are accessible to people who are blind or have low vision, nor are there any text descriptions of the many graphical figures that form an essential part of the Standards (there are 79 figures in AS1428.4.2, for example).

We contacted the Taskforce requesting a briefing about the content and graphics of all the Australian Standards referenced in the Consultation Regulation Impact Statement, so that our staff involved in the preparation of our submission could understand the Australian Standards references in their original context and also become familiar with the graphical figures. The Taskforce advised us that they did not have capacity to provide us with such a briefing, and they referred our request to the Department. In due course, the Department provided us with a contact at Standards Australia. Our discussions with Standards Australia eventually yielded an electronic version of AS1428.1` (2009) and AS1428.4.2 (2018), after the consultation had officially closed, and these did not include any descriptions of the figures. While these documents will be of value in the future, they have been of no value in the preparation of this submission because they were received too late. The situation remains that people who are blind or have low vision including key Vision Australia Staff are excluded from accessing Australian Standards that, directly or indirectly, affect their daily lives and their participation in key aspects of community life.

It is almost 30 years since the Disability Discrimination Act was introduced, yet basic documents that affect people who are blind or have low vision are still completely unavailable to them. If Government continues to tolerate and thereby abet this blatant discrimination against the blind and low vision community, then we strongly recommend that an alternative process be developed that would irrevocably sever the connection between Australian Standards and the Disability Standards that have been developed and promulgated under the DDA, including the Transport Standards. A less satisfactory alternative would be to copy the text of all references to Australian Standards, including text descriptions of the graphical figures, into an informational appendix to the Transport Standards (and other Disability Standards). This approach would not allow people who are blind or have low vision to study the Australian Standards in their entirety or consider the references in their original context, but it would at least be better than the egregious situation that exists at present.

Structure of this Submission

In the following sections we provide comment on several of the 16 proposed areas of reform that are most relevant for people who are blind or have low vision and that are within the scope of our experience and expertise. In each section we begin our comments by noting our preference for the status quo, regulatory option, or non-regulatory option, following the explanations in the Consultation Paper. In general, we strongly favour regulatory options because they are most likely to deliver consistency, predictability and maximum safety for people who are blind or have low vision. The language such as “where possible, public transport providers should aim to ...” or “transport operators should consider providing ...” that characterises the presentation of the non-regulatory options is little better than a licence to do nothing, and even in the best case it will not provide a consistent and predictable “whole of journey” approach that is needed if people who are blind or have low vision are able to use public transport equitably, independently and safely.

In our responses, we have retained the chapter headings from the Paper, but we have chosen to comment on the Consultation Questions (“Questions for the disability community”) as a whole and/or to provide other relevant comments, rather than to answer each question individually.

Chapter 4: Staff training and communication

Vision Australia’s preference is the regulatory option outlined in the Consultation Paper.

People who are blind or have low vision report that in general they have positive experiences with public transport staff and that these staff generally interact courteously and helpfully. However, there is inconsistency and hence unpredictability between states, within states between different transport modes, and within each transport mode between locations and between individual journeys. The result is that people who are blind or have low vision often feel quite anxious when embarking on a journey that involves using public transport because they cannot be sure whether they will encounter staff who are helpful and responsive to their needs.

A number of clients have reported that the COVID-19 pandemic has increased the inconsistency and unpredictability of their encounters with public transport provider staff. One client recently noted that prior to the pandemic the railway staff at a particular station would alert the client’s destination station that the client had boarded the train and would require some assistance at the destination, but now, and with no apparent consultation, staff decided that they would only alert the client’s destination station before the client boards the train, even if it means that the client has to wait for the next train. This change in procedure would seem to be unnecessary, but in any case it was introduced without any prior notification or explanation to passengers, and it is just one example of why people who are blind or have low vision are feeling less confident using public transport now than they did prior to the pandemic.

Another factor that has contributed to this decrease in confidence has been the need to wear masks. A recent survey of people who are blind or have low vision about COVID-19 experiences and expectations conducted by Vision Australia, found that over 50% of the 500 respondents said that wearing a mask either had a negative impact on their orientation and mobility or made it more difficult for them to communicate with shop assistants or transport staff. In light of this, and the likelihood that mask-wearing on public transport will be a periodic public health measure for the foreseeable future, it is even more important that public transport provider staff have a good understanding of the needs of transport users who are blind or have low vision, that they are familiar with basic techniques of how to guide a person safely, and that they know how to communicate effectively (for example, that they know it is not helpful or consistent with safety to say to a person who is blind things like, “the escalators are just over there” when the person obviously cannot see where “over there” is).

We believe that the regulatory option is the only approach that will ensure a consistent, predictable and safe “whole of journey” experience that will be critical in a post-COVID environment.

Chapter 6: Priority seating

Vision Australia’s preference is the regulatory option outline in the Consultation Paper. Within this option, the Consultation Paper provides four sub-options. We prefer the third option, i.e., that there must be 2 priority seats for each 20 seats on a conveyance, with a minimum of 2 priority seats.

Our experience engaging with our clients is that people who are blind or have low vision greatly value the availability of priority seating. Clients who are blind can find it difficult to identify vacant priority seating in the absence of braille and tactile signage, so we strongly support the inclusion of signage requirements in the Standards. A number of clients have reported that priority seating on inter-urban and interstate train services is not always available on their preferred day or time, so they may be obliged to reschedule, because on long-distance services priority seating near accessible bathroom facilities greatly increases amenity and convenience.

The COVID-19 changes have made it more difficult for people who are blind or have low vision to reliably identify priority seating on suburban public transport services, as they have been re-configured to comply with physical distancing requirements. The survey mentioned previously also found that over 50% of respondents said that they experienced difficulty complying with physical distancing because they could not detect floor markings, either because of the colour used or because the markings were not tactile, and 15% said that they had been verbally abused as a result. These findings do not apply only to public transport, but they underscore the need for adequate luminance contrast and accessible signage in public transport conveyances to identify features such as priority seating. The use of physical distancing in a post-COVID environment is likely to be an ongoing public health measure, and it is

essential that reform of the Transport Standards give due regard to the effects of such measures on the use of public transport by people who are blind or have low vision.

Chapter 8: Digital information screens

Vision Australia's preference is the regulatory option outlined in the Consultation Paper. However, we note with frustration and annoyance that we cannot assess this option with the degree of thoroughness and attention to detail that is characteristic of our approach, because the option refers to the suite of Australian Standards AS1428. We do not have access to this suite, for the reasons already discussed.

In general, people who are blind or have low vision report that they usually have considerable difficulty accessing the contents of digital display screens. Of course, people who are blind cannot access them at all, and none of the options outlined in this chapter address that lack of access. We are aware of a number of public transport infrastructure projects where no thought had been given to how information presented on digital information screens could be made accessible to people who are blind or have low vision.

The environments where digital display screens are used are typically complex and noisy, with many things happening simultaneously. People who have low vision must process a lot of information as they interact with these environments, and often by the time they have located the digital display screen the information they need has been replaced due to the short update interval. Issues such as glare, insufficient luminance contrast and illegible font size and type contribute significantly to the access barriers that these screens present and, in turn, these access barriers contribute to the anxiety that people who have low vision often experience when using public transport, especially when they have to interact with complex transport infrastructure such as interchanges and hubs, where digital information screens are ubiquitous.

A related issue is the inconsistency and unpredictability of audio announcements across public transport modes and within each mode. Information about upcoming services is often displayed on digital screens on platforms, transport interchanges and ferry wharves, and information about upcoming stops is displayed on screens within public transport conveyances. But regardless of how the information is displayed visually, there is no consistency in how, or indeed whether, information about upcoming services and stops will be conveyed via audio announcements. People who are blind or have low vision therefore continue to face significant uncertainty and anxiety when they use public transport, especially when their journey involves multiple transport modes. Many of our clients report that they are in a constant state of hyper-vigilance and stress when using public transport such as trains and buses, because they can never be sure from one mode to another, from one service to another, and even from one stop to another, whether there will be audio announcements to provide them with the location-specific information that is so critical to their journey.

We believe that the inconsistency and unpredictability in the provision of audio announcements in public transport infrastructure and within public transport conveyances is an issue that requires urgent action as part of the reform of the Transport Standards.

Chapter 9: Lifts

Vision Australia's preference is the regulatory option outlined in the Consultation Paper. We believe that the inconsistencies between the Premises Standards and the Transport Standards in this area must be resolved as soon as possible, and the regulatory option would achieve this resolution. However, because we do not have access to AS1735.12 we cannot assess this option further.

People who are blind or have low vision are finding it increasingly difficult to use lifts independently in new buildings (including premises associated with transport infrastructure) because of the use of touchscreen-based interfaces on the destination control systems used to call and direct the lift, but also on the operation panels inside the lift. The accessibility of these interfaces is not currently addressed by any standard in Australia, despite their growing prevalence. This issue was raised urgently during the second review of the Premises Standards, and we raise it again here because it cannot be left to languish for another five years.

While it is clearly important to have audible announcements and visual indications in lifts, their benefits are largely wasted if a person who is blind or has low vision cannot actually control the lift and direct it to their desired level.

Another issue that is often reported to us is that the volume of the audio announcements is often too low to be understood, especially in noisy locations such as transport infrastructure premises. Greater thought needs to be given to the minimum and maximum volume of these announcements, rather than simply accepting what is specified in an existing standard that has not kept pace with the world as it is experienced by people with a disability. The acoustic environment associated with public transport infrastructure is becoming ever more complex, and being unable to hear or understand the audio lift announcements only makes it more difficult for people who are blind or have low vision to negotiate them independently and safely.

Chapter 10: Website accessibility

Vision Australia's preference is for the regulatory option outlined in the Consultation Paper. Four sub-options are presented. Our strong preference is for sub-option 4 (WCAG 2.1, level AAA compliance), with a fallback to sub-option 3 (WCAG 2.1, level AA compliance). Under no circumstances can we accept sub-options 1 or 2, which refer to WCAG 2.0. The Web Content Accessibility Guidelines 2.1 are now the version referenced in other standards, such as EN301:549 (accessible public ICT procurement), and, as

the Consultation Paper itself notes, WCAG 2.2 is already under development. WCAG 2.0 was released over a decade ago, and web technologies have evolved rapidly since then.

If a reformed version of the Transport Standards references WCAG 2.0 it will be outdated before it is even introduced, and it will, moreover, generate and perpetuate an increasing number of serious inconsistencies with other standards. Given the rapid pace with which technologies and techniques of website and app design are evolving, it is essential that as many decisions as possible are made now that will “future proof” the Transport Standards.

Another factor that must be considered is that an increasing number of people who are blind or have low vision are using their smartphone to access public transport information, either instead of, or in addition to, traditional websites. Research conducted in 2019-20 by Vision Australia in conjunction with Curtin University found that 36% of people who are blind or have low vision use their smartphone to access public transport information, and 41% use their smartphone to assist them to move around in the community, for example, by accessing GPS apps. The Web Content Accessibility Guidelines 2.0 do not address the accessibility of apps, whereas version 2.1 does.

Our strong impression is that the majority of public transport provider websites do not comply with any version of the Web Content Accessibility Guidelines, let alone the latest version. In some cases, a public transport provider website might comply with the Guidelines in a technical sense, but be difficult or impossible to use in practice, because the provider has not conducted any user testing of the website. There appears to be a wide variation in the degree to which public transport provider smartphone apps comply with accessibility guidelines, whether they be the guidelines developed by Apple and Google or the Web Content Accessibility Guidelines.

As with other accessibility barriers, not being able to access information through a website or smartphone app has a significant negative impact on the use of public transport by people who are blind or have low vision. It is important to remember that accessibility barriers rarely exist in isolation, and the cumulative effect of one barrier after another can be well-nigh overwhelming in practice.

Chapter 11: Communication during service disruption

Vision Australia’s preference is the regulatory option outlined in the Consultation Paper. However, we recommend that a requirement be included to the effect that any information about planned or unplanned service disruptions provided in a digital form must be accessible to people who use assistive technology such as screen-reading software. We believe such a requirement is necessary because we have heard from clients that information they receive by email after subscribing to a provider’s planned disruption notification service is inaccessible because it is provided as a graphics image rather than text.

We are also aware of numerous instances during the COVID-19 pandemic in 2020 where public transport providers distributed safety instructions and other essential information via inaccessible digital formats.

A common experience of people who are blind or have low vision is that they are not provided with consistent or sufficient information during (especially unplanned) service disruptions. Often this is because there are aspects of the visual environment that provide clarity to what is happening, for example, a fallen tree across a train line or dangling electrical wires near a bus stop. Provided it is often when the provider has had time to install temporary signage, it is usually only in a standard visual form, which cannot be read by people who are blind or have low vision.

In many cases the safest, fastest and most effective way of providing information during a service disruption to a person who is blind or has low vision is through direct assistance. Such disruptions are usually stressful both for passengers and for the transport provider staff. It is therefore important that staff have received training in how best to communicate with and assist people who are blind or have low vision. One of our clients reported that during an unplanned train service disruption they were assisted to leave the railway station but they were taken to a completely unfamiliar location in a nearby street and just left there. The staff member assured the client that they would return to assist the client to continue their journey via an alternative means, but they never did return. Naturally the client was quite distressed by this experience, and it has made them feel more anxious and less safe when they have used public transport since then.

The need for clear regulation, supported by adequate staff training, is critical in the post-COVID environment, where disruptions and changes of various kinds can occur at a moment's notice. People who are blind or have low vision can be especially vulnerable in such situations because without direct assistance they can completely miss out on key safety and other information that is obvious visually.

Chapter 13: Assistance animal toileting facilities

Vision Australia's preference is the regulatory option outlined in the Consultation Paper. Even though this provision of such facilities represents a new element of the Standards, the regulatory option is appropriate because it is most likely to lead to the development of best practices and result in the most consistent and predictable "whole of journey" experience for people who are blind or have low vision and who use Seeing Eye Dogs or other assistance dogs.

There is an increasing number of people who are using Seeing Eye Dogs. Apart from the reasons given in the Consultation Paper, another factor is that it can be more convenient, efficient and less stressful navigating the complex and cluttered built environment using a Seeing Eye Dog or other assistance dog

than using a white cane or other mobility device. We expect this trend will continue, and so it is important that the need for appropriate toileting facilities is met.

Feedback we have received suggests that some existing assistance animal toileting facilities are not regularly maintained, leading to an unpleasant and unhygienic experience for both the handler and the dog. It is also important to consider the type of surface used in the toileting facilities, because not all dogs are comfortable or willing to use all surfaces. There is a need for ongoing co-design of these facilities with the disability sector, including Vision Australia and other organisations who are accredited and experienced in training assistance dogs.

Chapter 14: Emergency egress

Vision Australia's preference is the regulatory option outlined in the Consultation Paper. In developing the details of this option it will be essential that there is meaningful consultation with the disability sector, including people who are blind or have low vision. Having robust and consistent emergency egress requirements is critical to the safety of people who are blind or have low vision, and there must be coordination between all those involved or potentially involved in managing emergency situations in developing them.

We have received very little feedback about experiences with emergency egress from public transport conveyances or infrastructure. This may be because most people who use public transport have not encountered situations where emergency egress is required. From comments made during the consultations that were conducted as part of the second review of the Premises Standards, it does seem clear that many people with a disability believe that existing provisions related to emergency egress are inadequate. We hope that there is ongoing coordination between the Premises Standards and the Transport Standards to ensure that a consistent, whole-of-journey approach is taken to the development of emergency egress requirements that meet community expectations and maximise the safety of people with a disability.

In general, the provision of direct human assistance to people who are blind or have low vision should form a core part of emergency egress requirements. This is the only way that key features of the rapidly-changing visual environment can be communicated effectively in emergency situations. If an emergency egress is required from, say, a busy underground railway station, there will be challenges in identifying people with a disability who may require assistance. It must also be remembered that Seeing Eye Dogs and other assistance animals are also likely to experience considerable stress during emergency egress and this may impact their ability to guide a person who is blind or has low vision without additional support and assistance.

In any case, it will be essential that public transport operators produce consistent and current information about the assistance and other measures that people with a disability can expect during emergency egress situations so that people can familiarise themselves with emergency egress procedures in advance. We are unaware of any operator who has provided information in accessible formats for people who are blind or have low vision, even if they do have emergency egress procedures in place.

A significant concern that we expressed during the Premises Standards review consultations is the growing use of photoluminescent signs to provide visual guidance to emergency egress points. These signs have the advantage that they can operate when the power to a building is cut, but as a result they are much less well-illuminated than conventional signs, and as far as we know they have been developed and deployed without any consultation with the disability sector, or research into their usability by people who have low vision. Current and emerging standards around the specifications and use of these signs also appear to have failed to include input from the disability sector. It is essential that urgent research is conducted into the effectiveness of these signs for people who have low vision, and appropriate action taken if it turns out that they are not readable. In any case, people who are blind will be unable to read photoluminescent signs, just as they are unable to read conventional visual signs, so effective alternatives must be put in place so that people who are blind are not disadvantaged during emergency egress.

Chapter 16: Wayfinding

Vision Australia's preference is the regulatory option outlined in the Consultation Paper. Because this option references Australian Standards to which we do not have access, we are unable to comment in detail. We do note, however, that the lack of wayfinding was a strong theme emerging from consultations during the second review of the Premises Standards, and it was agreed by the blind and low vision community that existing requirements in the Standards and the National Construction Code are manifestly and grossly inadequate, especially insofar as these requirements relate to braille and tactile signage.

Lack of appropriate and sufficient wayfinding cues is a significant barrier to the independence of people who are blind or have low vision when they interact with the built environment or use public transport. Our strong view, consistently expressed over many years, is that there must be braille and tactile signage wherever there is standard visual signage, although there may be a need in some situations for the braille and tactile sign to contain abbreviated or summary content rather than to replicate the visual sign exactly. A person who is blind or has low vision must be able to accurately and consistently identify all toilet facilities (not just accessible toilets), room numbers and functions, and all other elements that are identified by standard visual signage.

Vision Australia’s experience interacting with our clients strongly suggests that the current requirements for luminance contrast are insufficient in practice to meet the needs of many people who have low vision, and we believe that more research is needed in this area before further changes are made to the Transport Standards.

Many people who are blind or have low vision report that the increasing use of touchscreen and other visual interfaces is making it more difficult for them to use features of transport infrastructure such as accessible toilets that incorporate interfaces for controlling the opening, closing and locking of the doors. Providing wayfinding cues is of little value if a person cannot interact with a feature after they have found their way to it.

Providing effective and safe wayfinding solutions that meet the needs of people who are blind or have low vision can be challenging in complex environments such as transport hubs and interchanges. It is essential that public transport providers work closely with the disability sector to co-design such solutions. The impact of inadequate wayfinding cues, or cues that are inconsistent across a person’s journey, can lead to increased stress and potentially create dangerous or even life-threatening situations if a person misunderstands the purpose of a particular cue, or if a particular cue is not used consistently across different transport modes.

Chapter 17: Tactile ground surface indicators

Vision Australia’s preference is the regulatory option outlined in the Consultation Paper. We note, however, that because the Australian Standards referenced in this option are not accessible to people who are blind or have low vision, we are unable to engage further with this option.

The lack of access to the Australian Standards that deal with tactile ground surface indicators (TGSIs) is particularly egregious, because it has meant that people who are blind or have low vision have never really been able to familiarise themselves with the details of a system of wayfinding cues that they frequently encounter as they navigate around the community, and they have also been unable to pursue complaints in cases where TGSIs have been misused or installed incorrectly. Nor has the blind and low vision community been able to assess the nature and extent of discrepancies between the Standards and the real-world experience of using TGSIs. There continues to be a flagrant disregard for the principles of access and equity, and the “nothing about us without us” philosophy that are foundational to contemporary approaches to disability policy, including the Commonwealth Government’s National Disability Strategy.

Partly because the key design and installation parameters for TGSIs are unavailable to the blind and low vision community, we find that many people are confused or uncertain about their nature and purpose. On the other hand, our impression is that entities such as transport providers that have easy access to the Australian Standards often regard TGSIs as an “easy fix” to a complex wayfinding problem, and deploy them without consulting the disability community or giving any thought to how they will be used in practice. The example mentioned in the Consultation Paper of directional TGSIs that lead to the middle of an intersection rather than directing a person across the street illustrates the thoughtless use of TGSIs that, in this case at least, can be dangerous and potentially life-threatening for people who are blind or have low vision.

We strongly support the view that directional TGSIs should be used judiciously, and that they should never be employed as a lazy alternative to good design. Directional TGSIs that are installed wantonly, without co-design from the disability community, are unlikely to result in tangible benefit for people who are blind or have low vision.

Further research is needed into how TGSIs are used by real people in the real world, and about their impact on other groups of users. The evidence gained from such research could lead to a significant improvement in our understanding of the benefits and limitations of TGSIs and how best to promote them to people who are blind or have low vision so that the benefits can be maximised. We are not persuaded that the current requirements around both directional and warning TGSIs are based on research that takes account of the current nature of complex transport infrastructure environments.

It is also important that the Transport Standards recognise that new and emerging technologies such as indoor Bluetooth beacons have the potential to significantly extend and enhance the wayfinding solutions that are available. Although technological solutions are not suitable for everyone, and while they should not be seen as a replacement for other wayfinding cues, they are almost certainly destined to be seen as the norm as more people who are blind or have low vision use smartphones as a tool for navigating around the community. The current reform of the Transport Standards offers a timely opportunity for considering how new and emerging technologies can be incorporated successfully into public transport conveyances and infrastructure. If this opportunity is squandered, then the Standards will quickly become out of touch with community expectations and be seen as delivering antiquated, suboptimal wayfinding solutions at a time when wayfinding is becoming more, not less, challenging for public transport users who are blind or have low vision.

Chapter 18: Passenger loading areas

Vision Australia’s preference is the regulatory option outlined in the Consultation Paper.

A significant issue that people who are blind or have low vision often experience when using taxis is that pickup and dropoff points can be located some distance from the passenger's location or destination. This is especially a problem at airports, where the taxi dropoff point may be 50 metres or more from the entrance to the terminal building. There are rarely, if ever, sufficient wayfinding cues to allow a person who is blind or has low vision to find their way from the taxi to the terminal. Even if the driver is willing to provide assistance, they may be unable to leave their vehicle for security reasons, and they may not be able to locate a security staff member due to the distance from the terminal. We are aware of instances where a driver has, in fact, left their vehicle to assist a passenger who is blind or has low vision, only to be fined or otherwise sanctioned by airport staff. We are also aware of situations where a passenger who is blind or has low vision has been compelled to enlist the assistance of a passer-by to get from the taxi to the terminal. Airline staff will not meet passengers at the dropoff point outside the terminal, as their "meet and greet" obligations appear to begin only when the passenger has entered the terminal building.

If taxi dropoff points must be located at a distance from an airport terminal (or other public transport infrastructure) then an effective solution must be found so that passengers who are blind or have low vision are able to obtain any assistance they may require to get from the taxi to the terminal. The current situation of uncertainty, inconsistency and unpredictability is causing needless anxiety and stress for passengers when they are planning or undertaking a journey that involves the use of taxis to arrive at or leave airports and other public transport infrastructure.

Chapter 19: Provision of information in multiple formats

Vision Australia's preference is the regulatory option outlined in the Consultation Paper. We believe that regulation is the best way of ensuring that people who are blind or have low vision are able to use public transport equitably, independently and safely. However, we are concerned that the form in which the regulatory option is presented in the Consultation Paper may require public transport providers to produce certain types of information in formats that are not optimal for the purpose for which the information is intended. For example, producing transport timetables in braille or audio can be time-consuming having regard to the frequency with which such information is updated, and it can be impractical for a person who is blind to carry multiple braille volumes of timetable information with them when they travel on public transport. It is worth remembering, however, that electronic braille notetakers that can store large amounts of information on an SD card are now available in a variety of sizes that can fit easily into a standard backpack. Electronic braille access completely solves the problem of traditional large and heavy braille volumes, while retaining the efficient and effective access to information that braille provides.

On the other hand, we are aware of very few public transport providers who produce general information in multiple accessible formats, including braille, and there is certainly a need for more information of this kind, which does not become out-of-date quickly, to be available in a customer's preferred format on request.

When people who are blind or have low vision undertake a journey they need critical information such as timetables, bus stop numbers and locations, railway platform numbers, and so on. This information is often not available in general timetables that are not provided in real-time, because it changes dynamically, depending on operational factors that vary frequently. Such dynamic information is best provided to people who are blind or have low vision through a telephone call centre and/or through a website or smartphone app that has been designed to comply with accessibility guidelines.

While the research we mentioned previously clearly shows that an increasing number of people who are blind or have low vision are using their smartphones to access public transport information, it is important to ensure that critical information that people typically require as part of their journey is not only available online or through a smartphone app. The usage of smartphones by people over 65 who are blind or low vision is much lower than in younger age groups, and in any case any technology can experience malfunction or a flat battery. It is essential that a passenger who is blind or has low vision is not left stranded and unable to access critical information if their smartphone becomes unusable as the result of a flat battery or loss of network coverage.

About Vision Australia

Vision Australia is the largest national provider of services to people who are blind or have low vision in Australia. We are formed through the merger of several of Australia's most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision is that people who are blind or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision or have a print disability, and their families.

Vision Australia service delivery areas include:

- Registered provider of specialist supports for the NDIS and My Aged Care Aids and Equipment;
- Assistive/Adaptive Technology training and support;
- Seeing Eye Dogs;
- National library services, early childhood and education services and Library for 0-7 year olds;
- Employment services;
- Production of alternate formats;
- Vision Australia Radio network including a national partnership with Radio for the Print Handicapped;
- NSW Spectacles Program; and
- Government advocacy and engagement.

We work collaboratively with governments, businesses and the community to eliminate the barriers our clients face in making life choices and including fully exercising their rights as Australian citizens.

Vision Australia has unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 26,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of our organisation.

Vision Australia is well placed to advise governments, business and the community on challenges faced by people who are blind or have low vision as well as they support they require to fully participating in community life.

We have a vibrant Client Reference Group, comprising of people with lived experience who are representing the voice and needs of clients of our organisation to the board and management.

Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment.