Queensland Government

Office of the
Director-General

Department of
Transport and Main Roads

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Disabilities and Transport Standards Section
Land Transport Policy Branch
Department of Infrastructure, Transport
Regional Development and Communications
disabilitytransport@infrastructure.gov.au

Dear Sir/Madam

Thank you for the opportunity to provide a submission in response to the Australian Government's Stage one *Reform of the Disability Standards for Accessible Public Transport: Consultation Regulation Impact Statement*, released for public consultation on 12 February 2021.

As you may be aware, the Department of Transport and Main Roads (TMR) was unable to provide its submission by the closing date of 23 April 2021 and required additional time to consider the potential impacts of the proposed reforms and seek Queensland Government approval.

Please find enclosed TMR's submission for consideration. If you require further information, please contact Ms Suzanne Rose, Executive Director (Service Policy), TMR, by telephone on (07) 3338 4209 or email at suzanne.rose@translink.com.au.

Yours sincerely

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Reform of the Disability Standards for Accessible Public Transport 2002

Submission to the Consultation Regulation Impact Statement

Department of Transport and Main Roads

Queensland Government

Contents

Glossary

Accessibility Reference Group (ARG)	The Transport and Main Roads ARG, established in 2014, is a consultative forum with disability sector, industry and government stakeholders. Meetings occur to discuss matters relating to improving the Queensland passenger transport experience and reducing barriers for the customer using public transport. Key disability and accessibility stakeholders provide valuable input and feedback on passenger transport services, products, infrastructure and initiatives across the network.
Department of Transport and Main Roads (TMR)	TMR manages transport and main roads in Queensland and acts as a provider of public transport, via its TransLink Division.
Digital licence	An App developed by TMR that allows Queenslanders to securely store their driver licences, photo identification cards and recreational marine licences digitally on their mobile devices.
GoldLinQ	The contracted operator for the Gold Coast Light Rail system.
Light rail vehicles	Light rail vehicles are essentially 'trams'. At this stage, Queensland has one light rail system which operates on the Gold Coast.
New Generation Rollingstock Trains (NGR trains)	75 NGR trains are being progressively upgraded and returned to service by 2024.
New Generation Rollingstock Train Commission of Inquiry (NGR Commission of Inquiry)	The NGR Commission of Inquiry was established in 2018 to determine why the new generation rollingstock trains purchased for Queensland did not comply with the relevant disability legislation. The NGR Commission of Inquiry was led by Mr Michael Forde, Commissioner. 24 recommendations were handed down all of which the Queensland Government accepted and implemented.
New Generation Rollingstock Project Working Group (NGR PWG)	The project working group consisting of disability sector representatives used for consultative processes for the accessible design and upgrade of the NGR trains.
Personalised transport	Personalised transport refers to taxi, ride-booking (rideshare) and limousine services in Queensland.
Public Transport Infrastructure Manual (PTIM)	The TransLink PTIM applies best practice planning and design principles to public transport infrastructure. It defines the elements of good public transport facilities, helps with evaluating existing facilities and should be used as a design tool when developing new infrastructure within the TransLink network. The manual is relevant to developers of public transport infrastructure, those planning public transport provision and development assessment.
Queensland Rail	Queensland Rail is a statutory authority, whose functions include management of railways; provision of rail transport services, including passenger services; and construction and maintenance of rail transport infrastructure. Queensland Rail acts as a rail transport operator in Queensland.
Smart Ticketing	Smart Ticketing is the new ticketing solution that will make choosing public transport easier by introducing new ways to plan and pay for a public transport journey. Smart Ticketing will introduce more than 14,000 new devices that will accept credit or debit cards, smartphones and smart watches in addition to go cards and paper tickets.

Introduction

About us

The Queensland Department of Transport and Main Roads' (TMR) vision and purpose is to create a single integrated transport network accessible to everyone.

Queensland's passenger transport network is managed by TMR through TransLink Division. The role of TransLink is to lead and shape Queensland's passenger transport system through the facilitation of services provided by private bus, coach, ferry, tram and regional air service operators, local governments, Queensland Rail and operators within the personalised transport industry (taxi, limousine and ride booking services).

Queensland Rail is a statutory authority and operates in accordance with the *Queensland Rail Transit Authority Act 2013*. It is responsible for the operation of passenger rail services and ensuring that supporting rail infrastructure remains safe, reliable and at a fit for purpose standard. The Rail Transport Service Contract between TMR and Queensland Rail governs the funding arrangements for new rail infrastructure, maintenance of the existing rail network and the provision of both south east Queensland and regional long-distance passenger rail services.

Submission

This document is TMR's submission in response to the *Reform of the Disability Standards for Accessible Public Transport: Stage 1 Consultation Regulation Impact Statement* (DSAPT CRIS) and incorporates commentary provided by Queensland Rail.

The submission responds to applicable questions posed in the DSAPT CRIS for 'operators and providers of public transport' and 'industry professionals' from a Queensland Government perspective. Where relevant, Queensland Rail commentary is specifically referred to separately to TMR's.

It should be noted that where TMR indicates a position of support for a regulatory or non-regulatory approach, this is a preliminary position only and subject to the provision of further detail and transparency regarding the proposed application of the amended DSAPT and associated financial impacts.

Given the significance of the DSAPT reforms, it is critical that input is received from all affected parties including all levels of government, the transport industry, the disability sector, people with disability and other impacted cohorts. Equally important is that affected parties have appropriate and sufficient time to fully consider the proposals being put forward by the Australian Government at each stage of the DSAPT reform process, to ensure outcomes achieve the right balance, and that impacts to key stakeholders are appropriately considered in the finalisation of relevant policy settings.

TMR's vision – A single integrated transport network accessible to everyone

TMR is committed to providing a passenger transport network that is accessible to everyone. This commitment is reflected in its vision and is at the heart of TMR's strategies and work programs with the purpose of bringing Queensland closer together through the delivery of customer-focussed passenger transport services.

TMR recognises the crucial link between DSAPT and other government strategies and plans that also seek to deliver customer focussed and functional outcomes for people with disability and older people including:

- the *National Disability Strategy 2010-2020*, which reflects the commitment by all governments to a unified, national approach to improving the lives of people with disability, their families and a community-wide shift in attitudes.
- the new *National Disability Strategy (NDS)*, currently under development in collaboration with the Queensland Government, Australian Government, other state and territory governments, and the Australian Local Government Association. The NDS will be finalised in the second half of 2021.
- the Queensland Government's *All abilities Queensland: opportunities for all (State Disability Plan 2017*

– 2020)

- the Queensland Government's *Queensland: an age-friendly community – Action Plan*;
- *TMR's Strategic Plan 2019 – 2023, Accessibility and Inclusion Strategy, Disability Services Plan 2020 – 2021*, and *Disability Action Plan 2018 – 2022*.

Synergies between these strategies and plans and the accessibility outcomes mandated by DSAPT, help drive TMR's commitment in delivering its vision to provide an accessible transport network accessible to everyone. This is evidenced by TMR's co-design approach with disability and accessibility stakeholders and through the many programs, products and services delivered by TMR, including:

- rectification works to the New Generation Rollingstock;
- the establishment of TMR's Accessible Transport Network Team to embed accessibility and inclusion into all facets of TMR business;
- the recent establishment of the Queensland Accessible Transport Advisory Council, chaired by retired District Court Judge Michael Forde, with membership representing accessibility, construction, government policy and law specialists – to provide strategic policy and technical accessibility advice on significant transport and infrastructure projects across the Queensland transport portfolio;
- TMR's Accessibility Reference Group, consisting of a cross section of government, industry and disability and accessibility stakeholders, to discuss matters relating to improving the Queensland passenger transport experience and reducing barriers for customer using public transport;
- TMR's dedicated funding programs:
    - the Passenger Transport Infrastructure Investment Program for design and construction of passenger transport infrastructure projects such as stops, stations and facilities, park 'n' rides, bus priority measures, signage, wayfinding and technology, and transit-oriented developments.
    - the Passenger Transport Accessible Infrastructure Program to assist local councils to upgrade existing passenger transport facilities to ensure they comply with the requirements of the DDA.

TMR's passenger transport services enable people to access crucial education, health services, employment and as importantly, connections to family and friends and recreational experiences available throughout the wider community. All members of our community have the right to access critical transport services that are provided consistently with principles and purpose underpinning the *Disability Discrimination Act 1992* (Cth) and human rights statutes.

TMR is supportive of and committed to the DSAPT modernisation reform process and recognises there will always be opportunity to provide greater accessibility outcomes as new and improved safety, design and technological advancements emerge. All levels of government, the passenger transport industry and the wider community must continually adapt their products, services and programs to deliver improved accessibility in recognition of the rights of people with disability.

Application and Compliance

TMR notes that the DSAPT CRIS does not provide detail about the proposed application of the amended DSAPT, or the proposed timeframes for compliance with it. This is a critical aspect that must be considered comprehensively – and consulted on widely.

Retrospective application of the amended *Disability Standards for Accessible Public Transport 2002* (DSAPT) may have significant impacts for some existing public transport infrastructure, premises and conveyances that may impose a substantial and unreasonable financial impost on transport providers and government. For these reasons, TMR considers that application of the amended DSAPT should only apply to new and upgraded assets.

However, consideration must also be given to emerging or new public transport infrastructure, premises and conveyances that may come into effect between now and commencement of the amended DSAPT – or public transport infrastructure, premises and conveyances that are 'in flight'.

In Queensland, there are a number of major multi-billion dollar infrastructure projects currently 'in flight' that require significant lead time from initial planning phases through to detailed design and delivery. Examples include the $5.4bn Cross River Rail project, the $709m Gold Coast Light Rail Stage 3 project, the $1.244b Brisbane Metro project, and the $335m accessibility upgrades to the New Generation Rollingstock. It should be

noted that the Queensland Government is already adopting a co-design approach to many projects, where feasible, and ensuring early engagement with a view to delivering best practice functional accessibility outcomes and relying on DSAPT as the minimum standard.

In light of the above, TMR considers that the application of the amended DSAPT should not apply to existing assets or impose any changes to 'in flight' infrastructure projects, including those outlined above.

This approach is based on the position that since 2002, the existing DSAPT has established the baseline for accessibility compliance with public transport services and networks in Queensland. Any change to that baseline for accessibility through an amended DSAPT is reasonable to apply to new and upgraded assets only on the basis that assets in existence prior to that or 'in flight' – met the requirements for accessibility at that time.

Financial impacts

Limited information is provided within this submission regarding potential cost impacts of the DSAPT CRIS proposals. TMR is aware the Australian Government has engaged PricewaterhouseCoopers Consulting Australia to seek information from providers for the cost benefit analysis that will inform the overall DSAPT Modernisation process.

Accordingly, without the cost benefit analysis or the approach to compliance being detailed in the DSAPT CRIS against each of the proposed options, it was not possible to undertake a rigorous and consistent forensic financial analysis of potential impacts, within the timeframe provided. Potential cost impact advice included in this submission is based on best available inputs from internal and external sources available to TMR and Queensland Rail at the time.

The cost benefit analysis must consider and address the potential application of the amended DSAPT prior to the formalisation of final positions. This will require comprehensive consultation with stakeholders including input to the implementation schedule and discussion with the Australian Government to provide appropriate funding contributions to support the cost of compliance with an amended DSAPT. This should be completed in advance of the Decision Regulation Impact Statement proceeding to the Infrastructure and Transport Ministers' Meeting for consideration, expected later this year.

Without this level of granular financial and associated detail it is not possible to fully realise the extent of future potential impacts on not only jurisdictional governments but also potential impacts to servicing and scheduling. Impacts to public transport services can be profound and far reaching if the application and implementation of the amended DSAPT does not take into account real-world applicability. This can extend to the availability of skilled trades, materials/resources, and numerous unforeseen local and global impacts.

Department of Transport and Main Roads' Response

Chapter 4 – Staff training and communication

Providers and operators of public transport

4.1 Which option do you prefer: regulatory, non-regulatory or status quo?

TMR appreciates the benefits of staff understanding the needs of people with disability.

The DSAPT CRIS options provide for the following:

- Status quo: maintain the current provisions in DSAPT and the Transport Standards Guidelines
- Non-regulatory: amend the existing Transport Standards Guidelines and the Whole Journey Guide with further guidance material to strengthen outcomes to be achieved
- Regulatory: insert a new section into DSAPT that is a performance requirement for staff training and communication. DSAPT would be supported by information in the amended Transport Standards Guidelines and include examples of accessibility awareness training and how people with disability can be directly involved in, and support the design of, the training.

TMR currently supports the **non-regulatory** option contained in the DSAPT CRIS.

TMR agrees that disability awareness training is an essential component for providers and operators to understand how to best support customers with disability, provide a positive customer service experience and remove any discriminatory practices. This aligns with the Queensland Government's commitment to build an inclusive Queensland where every person, including the one in five Queenslanders who have disability, can thrive and reach their full potential as equal citizens.

TMR considers that either the regulatory or non-regulatory option should see greater awareness of provider and operator obligations about staff induction and professional development on disability awareness and rights.

While a regulatory approach may be perceived as a stronger position, it is critical to ensure that the implications of a regulatory approach are fully understood, for example, the ability to enforce compliance should be carefully considered. In addition, it is necessary to consider if the potential for increased costs for providers and operators of public transport would be justified when considering whether a regulatory approach would result in a stronger outcomes for people with disability than a non-regulatory model.

The non-regulatory approach would be a good first step and would enable the potential implications for the transport industry if additional performance requirements are introduced to DSAPT to be thoroughly explored to determine if further consideration could be given to a regulatory approach.

4.2 What disability awareness training do you provide to frontline and back of house staff?

All TMR staff are required to undertake mandatory Access and Inclusion Training. The training was developed in partnership with the Queensland Human Rights Commission in response to recommendation 15 of the NGR Commission of Inquiry. It is designed to educate all TMR staff on their obligations, especially as a provider of goods and services, under the relevant disability legislation including the *Disability Discrimination Act 1992* (C'th).

The training is intended to provide staff with:

- an overview of people with disability in Queensland
- an introduction to the relevant disability legislation
- tools and techniques to make decisions that consider access and inclusion in day to day work.

All staff are also required to undertake mandatory training in Queensland's *Human Rights Act 2019* (Human Rights Act). This training explains the Human Rights Act and what it means for staff, rights protected by the

Human Rights Act, and what happens when a right is violated. It aims to raise awareness of obligations of all staff while conducting daily activities.

Some TMR staff have completed training in Writing in Plain and Easy English to improve skills and knowledge about accessible written information.

Disability Awareness Training has been provided to TransLink (frontline) Customer Liaison Officers, Busway Safety Officers, and Senior Network Officers.

Training is currently under way to ensure all relevant staff and consultants involved in TMR's Rollingstock Expansion Project understand disability legislation.

4.3 What processes are in place to ensure staff interacting with the public are aware of the needs of people with disability and transport accessibility?

In addition to the training referred to in response to question 4.2, TransLink also provides new Customer Liaison Officers with induction material that references information about how to engage and assist customers using the public transport network, including supporting customers with disabilities.

Personalised Transport

While not applicable to TMR staff, training requirements are in place for all drivers of taxis, limousines and booked hire vehicles (noting though DSAPT does not currently apply to/is silent on limousines and booked hire services). This includes:

- the requirement to be trained in anti-discrimination awareness (including sexual harassment) and disability; and
- drivers of wheelchair accessible vehicles must also complete training in providing wheelchair accessible services.

The requirements are set out in section 97 of the *Transport Operations (Passenger Transport) Regulation 2018* and the Personalised Transport Driver Training Notice.

Authorised booking entities and operators are responsible for developing and implementing driver training.

Compliance with the training requirements is monitored through a range of mechanisms, including chain of responsibility audits conducted under the *Transport Operations (Passenger Transport) Act 1994*.

4.4 What processes are in place to make sure staff involved in design, policy and procurement undergo disability awareness or transport accessibility awareness training?

In addition to the training referred to in response to question 4.2, TransLink's Customer Insights Team work closely with key project teams to embed and further develop insights specific to the needs of people with disabilities.

TMR also has avenues for less formal sharing of insights and best practice to effect culture change, including the Accessibility and Inclusion Advocacy Network (AIAN). The AIAN is a group of TMR staff dedicated to making accessibility, inclusion and diversity a priority in the workplace and across all TMRs products, services and infrastructure. Membership is open to all TMR staff on a voluntary basis.

NGR Trains

The Rollingstock Expansion Project Team is implementing Recommendation 15 from the NGR Commission of Inquiry. All staff who are involved in planning or designing public transport infrastructure, or who evaluate or provide advice on public transport infrastructure will receive training to ensure they understand disability legislation. Training sessions are currently underway for all staff and consultants on the Rollingstock Expansion Project Team. This one-hour training session is mandatory with attendance records taken and is facilitated by an accessibility consultant.

Whole-of-Government

The NGR Commission of Inquiry also made other critical recommendations regarding, amongst others, enhancements to procurement requirements including training. The Queensland Government has implemented training packages for all senior executives and procurement officers responsible for procurement of infrastructure in compliance with the *Disability Discrimination Act 1992 (*C'th).

Additionally, the Queensland Government developed the '*Accessibility compliance in procurement – ensuring accessibility for people with a disability'* guide to further assist Queensland Government agencies to understand and implement their obligations under the disability legislation.

4.5 Can you provide any details concerning costs incurred and time taken by staff to undergo current disability awareness training you have in place?

Mandatory on-line Access and Inclusion Training for all TMR staff takes approximately 20 minutes to complete.

Mandatory on-line *Human Rights Act 2019* training for all TMR staff takes approximately 10 minutes to complete.

Disability awareness training provided to TransLink Customer Liaison Officers, Senior Network Officers and Busway Safety Officers was facilitated by an accessibility consultant. Sessions ran for approximately half a day.

NGR Trains

The mandatory disability awareness training sessions for the Rollingstock Expansion Project Team run for one hour and are facilitated by an accessibility consultant.

4.6 If staff disability awareness training was mandatory:

4.6.1 Would you be required to implement new training programs?

Should staff disability awareness training be introduced as a mandatory requirement, it is highly possible that existing training programs may need to be adjusted to be specific to individual role requirements, the training design may need to be reviewed with the involvement of a person with disability, training delivery may need to be reviewed (train the trainer by people with disability) and training may need to include hypothetical scenarios of people with disability experiencing positive and negative interaction with public transport staff.

Queensland Rail

Queensland Rail would need to undertake a cross-functional gap analysis of its existing accessibility related training. To meet the new requirements, Queensland Rail will need to develop/define:

- Tailored training for specific roles
- Induction and regular training refreshers
- Disability sector consultation, review and verification of training
- Train the trainer requirements
- Involvement of persons with disabilities and disability sector organisations in the delivery of training
- Scenario training for public transport staff, including interactions with customers with disabilities.

4.6.2 What costs would you incur?

Costs are unknown at this time, however, if training was mandatory, TMR would need to review existing content and would likely seek to engage expertise within the disability sector to inform any developments to the training material. It is anticipated that this would likely incur a cost.

4.7 Are there examples of improved accessibility or improved customer service interactions as a result of recently implemented training programs or well-trained staff?

Feedback from TransLink Customer Liaison Officers who completed the disability awareness training indicated that they felt more confident assisting customers with disability on the network, particularly in relation to hidden disabilities.

4.8 Are there any cases of complaints or other impacts on people with disability that you are aware of relating to staff training?

TransLink receives complaints about the behaviour/helpfulness of frontline staff (for example, bus drivers) in supporting the needs of customers with disability. For example, complaints are received about bus drivers not lowering the front of the bus or assisting with ramps when customers are boarding/alighting. These complaints are sent to the operator to investigate, with the outcome often resulting in refresher training and counselling for the identified driver.

In early 2019, TransLink attended a Human Rights Commission mediation session in relation to a complaint about public transport infrastructure and an incident relating to compliance with DSAPT. While the infrastructure matters were the responsibility of other parties, the customer requested that the actions from this mediation include all relevant team members undertake refresher training in Access and Inclusion Awareness and the Human Rights Act. This was completed by August 2020.

Chapter 5 – Mobility aid safety

Providers and operators of public transport

5.1 Which option do you prefer: regulatory, non-regulatory or status quo?

TMR acknowledges the importance of mobility aid safety for passengers with disability using public transport.

The DSAPT CRIS includes two options for mobility aid safety:

- Status quo: No change is made to DSAPT or the Transport Standards Guidelines
- Non-regulatory: include guidance in the Whole Journey Guide concerning mobility aids on conveyances. No changes would be made to DSAPT or the Transport Standards Guidelines. Guidance would outline considerations for designers with regard to improving the safety of mobility aid users travelling on a conveyance, in particular, on buses, trams and light rail where they are subject to greater forward and lateral movements.

TMR notes that there is no regulatory option provided in this DSAPT CRIS, that further consideration of mobility aid safety will occur in the second stage of DSAPT reform and that valuable input may be gained from research commissioned by Department of Transport Victoria.

Safe and secure customer journeys is a key TMR objective that is reflected in its *Strategic Plan 2019 – 2023*. TMR recognises that the availability of mobility aid containment systems may improve safety outcomes for people who rely on mobility aid devices by removing barriers that may prevent or inhibit independent travel across the passenger transport network. Additionally, TMR considers that mobility aid device safety should be applied consistently by transport operators and designers to ensure a consistent travel experience for people who use a mobility aid.

TMR agrees there is merit in reform to strengthen guidance for operators and designers about mobility aid safety. However, TMR suggests that it would be preferable to maintain the status quo and for the Australian Government to undertake further consultation as part of stage two of the DSAPT reform process before changes are progressed. This approach will provide an opportunity to adopt an approach to reform that prioritises the rights of people with disability and ensures a cohesive approach to implementation.

What has been your experience in facilitating travel of mobility devices and carers for people using a device on the network?

It is acknowledged that there can sometimes be significant displacement forces during starts, stops and turns, which are a product of the road environment and that driver behaviour and traffic conditions contribute predominantly to the passenger experience. Under the *Transport Operations (Passenger Transport) Standard 2010*, bus drivers must be given training on their obligations and responsibilities under passenger transport legislation.

TMR encourages training to include information about the operator's incident management plans for vehicle breakdowns and other incidents or emergencies; customer service skills; transporting people with disabilities; workplace health and safety responsibilities including an explanation of their duty of care; company policy including refusing travel, customer service and so on. On occasion, TMR also writes to contracted bus operators about the importance of driving safely when transporting people using mobility aid devices.

TMR has developed guidance material for passengers using mobility aid devices to help them understand how to travel safely on public transport. The brochure, *Wheelchairs and Mobility Scooters A guide for safe travel in Queensland*, provides clarity on what devices are appropriate for use on public transport (dimensions and so on); information about DSAPT requirements and the use of devices once on board public transport (by each mode). The brochure is publicly available on TMR's website. When it was last revised in 2017, TMR provided the brochure to mobility aid device retailers in an effort to raise awareness about the types of mobility aid devices that are appropriate for use on public transport. TMR continues to provide brochures to retailers when requested.

The TMR and TransLink websites include general information for people using wheelchairs and mobility aid devices on public transport.

TransLink provides additional support by offering concessions and subsidies which include:

- free travel for one companion or carer travelling with a Companion Card holder (providing the cardholder has a valid ticket for travel);
- the Taxi Subsidy Scheme which provides subsidised taxi travel for people with severe disabilities – half of the total fare, to a maximum of $25 per trip.

It is acknowledged that based on the results of the self-assessment by TMR contracted operators against the 31 December 2017 DSAPT compliance targets as part of the Australian Government's third review of DSAPT, most providers were nearly 100% compliant with the allocated space requirements.

5.2 What mobility device restraining systems are used on your public transport conveyances?

5.2.1 How have these mobility device restraining systems affected the safe travel of people with disability?

5.2.2 What was the cost of these systems?

5.2.3 What data do you have on utilisation of restraining systems by people with disability when on-board?

While TMR does not own or operate any public transport conveyances, commentary is provided about conveyances operated by our delivery partners.

Passive restraints are used on buses, trams, trains and ferries to contain movement within the allocated space.

Active restraints are not used on buses (unless required under other statutes per specific conveyances for example, coaches and certain school buses), trams, trains or ferries because they are not required.

When travelling in an accessible taxi, people using a mobility scooter must relocate to a fixed seat and use a seatbelt. People using a wheelchair may travel in a taxi while seated on the wheelchair as long as the passenger is restrained, and the device is appropriately secured.

All taxi users, including people travelling in a wheelchair must wear a seatbelt – at a minimum, a lap-sash belt must be fitted for each seating position. Passengers must be secured facing forward with the wheelchair anchored. Wheelchairs and mobility scooters must have four anchorage points for securement and must not be too large to fit in the allocated space.

5.3 What technical barriers or difficulties do you experience in implementing solutions which prevent tipping of mobility devices in both existing and new fleet?

In respect of technical barriers or other difficulties in implementing solutions which prevent tipping of mobility devices in both existing and new fleet, these extend to the following:

- The current specifications of existing fleet may not be fit for purpose to apply active restraints without significant and costly retrofitting.
- In addition, should active restraints be installed in new fleet, this would result in a mix of the overall fleet equipped with active restraints which may result in mixed customer experiences and perceptions of the value and safety of active restraints.
- It is acknowledged there are numerous active restraint systems available in the market, however the suitability of these products would need to be determined by experts in relevant fields including engineering and accessibility. This would be a costly exercise for each operator to undertake given there are no active restraint system(s) pre-identified and deemed fit for purpose in DSAPT.
- Additionally, as not all mobility aid devices have anchorage points (for example scooters), this would need to be taken into consideration.
- Without government mandating the installation of a particular active restraint system, or a range of active restraint systems, this may result in variation and an inconsistent customer experience and outcome across the network.
- Similarly, without government mandating the use of active restraints by passengers travelling in mobility aid devices, the potential safety benefit and investment value may be significantly reduced. However,

it is noted that compliance efforts to enforce the mandatory wearing of active restraints would be constrained due to operational and practical challenges.

- Furthermore, the installation of active restraint systems for the use of passengers in mobility aid devices may create expectations that active restraint systems should also be provided for able bodied passengers. While subject to legal interpretation, failure to provide active restraint systems for able bodied passengers could lead to claims of less favourable treatment towards people without disabilities. In the same vein, the provision of active restraint systems solely for the use passengers in mobility devices may be perceived (by that cohort) as direct or indirect discrimination whether the use the active restraint system is mandatory or not.

It is highly likely that contracted operators would seek to pass on the costs associated with the installation, maintenance and operation of active restraint system(s) to the Queensland Government. The cost is likely to be significant which may result in undesirable outcomes for government and the community.

5.4 What are the barriers, operational costs and other considerations that may arise if staff are required to assist customers in utilising an active restraint system?

Desktop research has identified a number of active restraint systems available in the market however they all provide different levels of functionality, some of which may require the intervention of the driver or another person to activate the restraint.

There are challenges that arise from a driver being required to provide assistance that would need to be carefully managed. For example:

- Buses would be required to dwell at stops for longer thereby impacting on-time running and related Key Performance Indicators. This has identifiable impacts including scheduling and current contract arrangements.
- There may be a need for ongoing training requirements for drivers and the potential for workplace health and safety concerns.

TMR is committed to creating a single integrated transport network accessible to everyone. Much work has been done – and continues to – in encouraging the community to increase its use of passenger transport services. Impacts to scheduling and on-time running would likely negatively impact the use of passenger transport services.

As not all customers that use mobility aid devices use or require the assistance of a carer, any active restraint system would need to be able to be operated by the passenger independently.

There is also the potential that installation of active restraint systems may impact existing seating arrangements, including a potential loss of seating.

5.5 What alternative mitigations have you implemented to address the risks associated with mobility aids tipping or sliding out of allocated spaces while in transit?

Please see response to Question 5.2.

5.6 Have mobility device users on your public transport conveyances had accidents where the device has slipped or toppled over?

There are limited reports of passengers in mobility aid devices tipping or sliding out of allocated spaces while travelling on contracted services in Queensland.

5.7.1 What methodologies have been implemented to minimise or reduce the likelihood of further incidents occurring?

Under the *Transport Operations (Passenger Transport) Standard 2010*, operators must report incidents that meet the incident definition under the Standard (which includes injury to a passenger). Any reported incidents are investigated with the relevant delivery partner to identify areas for improvement.

As indicated under Question 5.7, there are limited reports of passengers in mobility aid devices tipping or sliding out of allocated spaces while travelling on contracted services in Queensland.

Additional advice

TMR is monitoring advances in the development of restraint systems for use by people travelling in mobility aid devices on buses.

TMR is aware of the range of restraint systems offered by Q'Straint, although it does not appear these products are currently being used in Australia.

One of the Q'Straint systems is promoted as requiring no driver intervention and appears to require no involvement from the passenger either.

It appears that cost for the Q'Straint systems range between $1200 and $36,500, depending on the level of automation (whether driver intervention is required or not).

TMR is aware that in 2012, Transport for Brisbane voluntarily tested a restraint device (safety belt). The test demonstrated that the restraint system was considered impractical due to operational failure of the device and the manual dexterity demands that it placed on people with disabilities, meaning that independent fastening of the safety belt would be limited to a minority of wheelchair users.

TMR is also aware of a device implemented by one of our delivery partners involving a manual arm that came down once the passenger and their wheelchair were in place in order to provide additional stability. This was only implemented on a trial basis and was removed due to lack of use.

Chapter 6 – Priority seating

Providers and operators of public transport

6.1 Which option do you prefer: regulatory, non-regulatory or status quo?

The DSAPT CRIS provides for three options:

- Status quo: no change is made to the DSAPT or the Transport Standards Guidelines text.
- Non regulatory: insert new guidance material on good practice designs for priority seats into the Whole Journey Guide to provide context and expanded informative material for priority seats.
- Regulatory: amend DSAPT to provide a balance of prescriptive and performance requirements for priority seats in conveyances. Update the Transport Standards Guidelines to reflect the DSAPT amendments.

TMR supports the **regulatory** option for new and upgraded assets only, with the exclusion of 'in flight' projects.

Implementation should be subject to reasonable and practicable compliance timeframes.

The regulatory option is also preferred for light rail vehicles (trams), although this can be addressed under existing contractual mechanisms. Contracted service providers and maintenance providers would be best placed to advise of the impacts or prescribed mobility aid restraining systems.

It is noted that the regulatory option includes a proposal that State regulators may choose to issue penalties to passengers who refuse to vacate priority seats on operators' request. Beyond the significant challenges with enforcement, and availability of staff to enforce, this also presents risk of creating customer on customer conflict.

Already, the use of priority seats is a contentious issue among customers in particular customers with hidden disabilities. They often feel uncomfortable using priority seats and are concerned about having to justify their right to use them if challenged by other passengers. Introducing penalties could create greater anxiety for customers with hidden disabilities when using these seats.

There is also risk of creating conflict between customers with disabilities, and they may feel required to justify why they need the seat more than other customers with disabilities. Again, this risk is increased for customers with hidden disabilities who are already anxious about being challenged.

6.1.1 For the number of priority seats in the regulatory option, do you prefer: option 1, option 2, option 3 or option 4?

The DSAPT CRIS provides four sub-options for both the regulatory and non-regulatory approaches:

1. For every 20 passengers or part thereof, one priority seat must be provided. Passenger capacity includes both seated and standing passengers. Minimum provision for conveyances must be two priority seats.
2. Not less than 5% of the passenger capacity must be provided. Passenger capacity includes both seated and standing passengers. Minimum provision for conveyances must be two priority seats.
3. For every 20 seats or part thereof, one priority seat must be provided to ensure that eligible passengers can access a priority seat without difficulty. Minimum provision for conveyances must be two priority seats.
4. A minimum number of priority seats must be provided to ensure that eligible passengers can access a priority seat without difficulty. Minimum provision for conveyances must be two priority seats.

<u>Buses</u>

Of the regulatory sub-options, sub-options 3 and 4 would be preferred due to the flexibility they afford, as sub-options 1 and 2 may impact future bus fleet procurement and vehicle costs.

NGR Trains

Of the sub-options, sub-option 1 however would be preferred for NGR trains.

6.2 How many priority seats are provided on your conveyances?

While TMR does not own or operate any public transport conveyances, commentary is provided about conveyances operated by our delivery partners.

As per the current DSAPT provisions, public transport operators and providers are required to provide at least two priority seats on conveyances. As part of the Australian Government's third review of DSAPT, TMR's contracted operators performed a self-assessment against the 31 December 2017 DSAPT compliance targets. Results demonstrated that most providers were almost 100% compliant with the priority seating requirements.

Based solely on the fleet of one of TMR's significant contracted bus operators (based on size of fleet and operating area), the majority of its fleet already exceeds the minimum number of priority seats required in accordance with DSAPT. This operator's fleet predominantly provides four priority seats per the majority of its conveyances.

Buses

New buses in South East Queensland are all likely to comply with regulatory option 1; however, the majority of delivery partners across Queensland currently meet regulatory sub-option 4.

Gold Cost Light Rail

Each existing tram has 12 priority seats.

Queensland Rail

Currently, Queensland Rail provides twice the minimum number of priority seats on South East Queensland trains (four per carriage, 24 in total per a six-car set).

6.2.1 Considering the current requirements for priority seating, what has been your experience in the use and availability of these seats?

Further to the issues raised under 6.1, TMR suggests that signage is more inclusive to identify that about half of customers with disability have an invisible one. Customers who don't have an ongoing disability but may have a transient condition requiring a seat should also be considered in this context.

6.2.2 What is the impact of providing more than the required number of priority seats (more than 2 per conveyance)?

Light Rail Vehicles

While possible for new light rail vehicles used on the Gold Coast Light Rail System, there are several technical and safety risk areas that would impact the proposed requirements if applied retrospectively.

A codesign process for five new light rail vehicles is underway and includes consideration of priority seating. This process indicates meeting the proposed regulatory option is not straightforward and will involve risk assessments to determine the location of priority seats so that customers can use them safely while retaining structural integrity of the light rail vehicles.

Buses

The full impact of all TMR contracted bus operators has not been determined as this would require a statewide delivery partner audit of all current seating allocations to understand the impact of any changes. Larger vehicles with greater passenger capacity in particular, may be those most affected by increasing the minimum number of priority seats per conveyance.

Other potential impacts may also extend to scheduling and availability of fleet as a result of retro fitting seating upholstery and installation of arm rests if these elements were regulated.

While costs are unknown at this time, it is expected that any costs would be passed onto to the Queensland Government by its delivery partners.

NGR Trains

There will be no impact to the NGR train fleet.

Following engagement with the disability sector on accessibility upgrades to the NGR train fleet, all will be upgraded to have 84 priority seats, which is an increase from 20 priority seats currently (all 75 NGR trains will be returned to service by 2024).

24 standard seats will be converted into additional priority seats with red upholstery, armrests and signage. An additional 40 standard seats closest to doors will be converted into priority seats. Most will be transverse, none will have armrests, and all will have red priority upholstery and signage.

The need for these additional priority seats were identified by the NGR Project Working Group which is consists of disability sector representatives.

This increase in priority seats (total 84) signifies 10% of the passenger capacity (both seated and standing – 964).

These changes aim to:

- Provide additional priority seating for people who need it, including people with disability, the elderly and pregnant women;
- Provide consistency in the layout/location of priority seats (important for people who are blind or vision impaired);
- Provide priority seating where it is most required – closest to doors.

Queensland Rail

The impact of implementing the regulatory option is yet to be determined. However, with combined seated and standing capacity of 950 customers, 48 priority seats would be required.

Converting standard seats to priority seats will involve changing seat fabric colours, installing signage and relocating fire extinguishers.

Currently, Queensland Rail trains provide priority seating with armrests above minimum compliance. A safety assessment for the full South East Queensland fleet will be required to determine if this position is sustainable with an increase in priority seats.

To meet the proposed regulatory option, a full South East Queensland fleet engineering assessment will be necessary to consider flow on impacts to crashworthiness and other considerations such as access paths between priority seats and allocated spaces.

6.3 If you have or were to install additional priority seats, what upfront and ongoing costs associated would you incur?

6.3.1 How will this impact associated operational issues?

While TMR does not support applying DSAPT amendments retrospectively due to significant operational and cost impacts, the below response refers to existing fleet if retrospectivity of new or amended requirements under DSAPT were to be applied.

NGR Trains

All 75 NGR trains are being progressively upgraded and returned to service by 2024.

The new additional priority seats are one of many accessibility upgrades being undertaken at a total cost of $335 million. This includes additional priority seats, changed upholstery, and additional signage above new priority seating. No structural changes are required. This is a one-off change and therefore associated costs are also one-off.

Buses

Determining whether new seats would be required to be installed, or existing seats can be converted, and the impact of this on delivery partners, is required prior to understanding the impact to operations.

6.4 What challenges would you face if the Transport Standards made it mandatory for upholstery or material (colour/luminance) of priority seats to contrast with regular passenger seating?

Buses

Changing upholstery of existing seats is manageable for most of the existing fleet.

One of TMR's significant contracted bus operators fleet already use alternate colour for their priority seating.

6.4.1 What upfront or ongoing costs would you incur?

If not already provided, TMR or it's delivery partners would incur costs for changing upholstery of existing seats for initial installation and fabric perspective. Sufficient time is required to implement the change.

6.4.2 What benefits would be achieved?

If a standard priority seating colour is applied across all conveyances, TMR can use this colour in its communication and marketing for promoting the appropriate use of priority seating for customers. This will ensure easy understanding for all customers and would provide consistency for delivery partners and customers.

NGR Trains

As NGR trains come into service, they will have contrasting colour upholstery for priority seats, therefore there will be no impact if introduced as a mandatory requirement.

6.5 How do you address circumstances where an individual refuses to vacate a priority seat for a person with a disability?

TMR is cognisant of the risk of violence that drivers face from backlash by passengers. As such, TMR questions the impact of compelling drivers to enforce this or apply penalties. Instead, TMR Senior Network Officers, who are authorised to enforce TMR's terms and conditions of travel, could potentially undertake this task as part of their duties. However, the progression of this proposal would require greater consideration and extensive consultation with numerous government and industry stakeholders.

TMR's *Passenger Code of Conduct* states that passengers seated in a priority area need to vacate the seat if a person with disability or reduced mobility boards the service.

An effective communication campaign, coupled with clear signage, could be promoted to support drivers.

If DSAPT was amended to allow regulators to issue penalties to passengers who refuse to vacate priority seats, TMR would need to consult delivery partners and its Bus Safety Forum on how this would be best managed.

Additional advice

With regard to operators choosing to issue people eligible for a priority seat with a form of identification such as a lanyard, it is considered that such a scheme would generally be met with community acceptance in Queensland. Our research has shown that many customers – particularly those with hidden disabilities – are not comfortable asking for a seat and a device may help them to articulate their need.

However, there are significant challenges with administering such a scheme, including cost, risk of misuse, and creating a new source of passenger conflict among those with different types of disabilities that all feel entitled to access the seats.

More inclusive signage and greater community awareness of hidden disabilities and passenger etiquette would deliver more effective outcomes.

The TMR Disability Action Plan 2018-2022 includes an action to investigate initiatives which encourage passenger behaviour that creates a safe and inclusive environment for people with disability when using passenger transport. The correct use of priority seating is one of the focus areas for this action, and some preliminary research has been undertaken about the challenges faced by customers with disability, particularly hidden disabilities, when requiring a priority seat.

NGR Trains

As a result of accessibility upgrades and engagement with the disability sector, NGR trains that come into service, will include the following in relation to priority seating:

1. Upgraded priority seating signage to include symbol of person with white cane, person with disability, seniors, pregnant women and adults carrying children, and wording including “Please vacate seat on request”. Please see below image:

2. Added signage on the outside of each car to denote cars with priority seating.
3. Added priority seating signage to weather shield upon door entry for all cars except for the middle cars (cars MA/MB). In these cars where there is no weather shield, priority signage is only on the window above priority seats.
4. Relocated fire extinguishers from below seats that are converted to priority seats in the middle cars (cars MA/MB) to provide room for assistance animals.
5. In addition to upholstering all Priority Seats in red upholstery, symbols and wording will be stitched into upholstery.

In respect to the accessibility upgrades to the NGR Trains, the NGR PWG recommended that minimum standards and specifications for priority seating in the future for new trains should not be diminished and any further changes should require further consultation with TMR's ARG. This ensures that a precedent is not created for diminishing of disability functionality by government entities without consultation.

Chapter 7 – Allocated spaces in transit

Providers and operators of public transport

7.1 Which option do you prefer: regulatory, non-regulatory or status quo?

The DSAPT CRIS provides three options:

- Status quo: DSAPT requirements for access paths, manoeuvring spaces and allocated spaces in conveyances remain unchanged.
- Non-regulatory: insert a guidance chapter on good practice designs and performance requirements for access paths, manoeuvring spaces and allocated spaces in conveyances into the Whole Journey Guide. The Whole Journey Guide encourages policy makers, planners, designers, builders, certifiers and operators to think beyond compliance and the physical and governance boundaries of services and infrastructure and focus instead on people's accessibility needs across their whole journey.
- Regulatory: amend DSAPT to provide a balance of mandatory prescriptive and performance requirements for access paths, manoeuvring areas and allocated spaces in conveyances. Update the Transport Standards Guidelines to reflect and provide advice concerning the new regulatory requirements.

TMR supports the **regulatory** option for new and upgraded assets only, with the exclusion of 'in flight' projects.

Implementation should be subject to reasonable and practicable compliance timeframes.

It is also considered that the non-regulatory option could also result in providing greater clarity and guidance than is currently reflected in DSAPT, on the accessibility and clearance requirements for access paths, manoeuvring areas and allocated spaces in conveyances.

7.1.1 For the regulatory option, which sub-option do you prefer: sub-option 1, sub-option 2, sub-option 3 or sub-option 4?

The DSAT CRIS identifies four regulatory sub-options for the specified items that can intrude into the vertical space:

1. allocated space grab rails, a signal for requesting the deployment of a boarding device or overhead handrails and hand grips provided for the safety of standing passengers.
2. allocated space grab rails, a signal for requesting the deployment of a boarding device, overhead handrails and hand grips provided for the safety of standing passengers, or forward excursion barriers (ironing boards) complying with AS/NZS ISO 10865.1-2015.
3. allocated space grab rails, a signal for requesting the deployment of a boarding device, overhead handrails and hand grips provided for the safety of standing passengers, or forward excursion barriers (ironing boards) and lateral excursion barriers complying with AS/NZS ISO 10865.1-2015.
4. controls, grab rails, passive restraints or safety devices intended for use by any occupant of an allocated space, plus any safely located air-conditioning ducts or electrical conduits conforming to Australian Design Rules that do not restrict manoeuvring or carriage of a mobility device.

TMR supports regulatory sub-option 3 as it is considered it would provide practical and useful outcomes.

7.2 Given the current requirements for allocated spaces what is your experience in the customer use of these facilities?

In 2020, TransLink consulted with members of TMR's ARG about the appropriate use of allocated spaces. As a result, a social media campaign occurred to promote the Passenger Code of Conduct and reiterate the importance of ensuring the allocated space is available when needed for people with disability. A print campaign also occurred with images of the Passenger Code of Conduct illustrating a person vacating an allocated space for a person with disability. This material appeared on board public transport conveyances.

NGR Trains

The New Generation Rollingstock Project Team undertook an extensive equivalent access process on the car layout of rollingstock, in particular around the placement of allocated spaces and impacts on access paths.

The disability sector provided feedback that it was more beneficial for users to have a layout that was 'functional' as opposed to 'dimensionally compliant'.

Feedback from the disability sector that was incorporated into the upgraded design includes:

- avoiding placing two allocated spaces adjacent/next to each other due to the difficulty to manoeuvre a motorised scooter or wheelchair into the space if one is already occupied;
- maintaining the size of the allocated space is more important than a minor reduction of access path;
- achieving compliance through Equivalent Access is a viable option that can achieve more functional outcomes for users with disability.

7.3 How would operators and providers be impacted if the Transport Standards made it mandatory for access paths that lead to allocated spaces to be free of obstruction by protruding objects, or allocated spaces to be clustered close to door vestibules or passenger areas and to accommodate larger mobility aids?

NGR Trains

Accessibility upgrades to the NGR trains mean that they should be compliant with any regulatory changes.

Light Rail Vehicles

With regard to a continuous accessible journey, matters such as traversing or walking over articulated moving floor areas would need consideration in any design for light rail vehicles (trams).

Buses

TMR would need to work closely with delivery partners to understand the impact if applied to existing fleet, the impact that removing fold down seats would have for relevant vehicles, and how new regulations could best be managed. It would also be important to engage with bus manufacturers to understand implications.

Queensland Rail

Impacts for Queensland Rail will include:

- Reconfiguration and/or removal of onboard seating may be needed for both South East Queensland and regional fleets.
- New signage will be needed to advise customers to vacate allocated spaces for mobility aid users, similar to priority seats.
- An engineering assessment for the full South East Queensland fleet will be required to determine if existing fixtures like fold-down seats currently protrude into the 3D space clearance.

7.4 What upfront and ongoing costs would you incur if these changes became mandatory?

While TMR does not support applying DSAPT amendments retrospectively due to significant operational and cost impacts, the below response refers to existing fleet if retrospectivity of new or amended requirements under DSAPT were to be applied.

Buses

There will be operational and cost impacts involved in retrofitting any existing fleet, particularly if major changes are required.

Consideration should be given to value for money given the remaining life span a vehicle may have.

NGR Trains

It is anticipated that no additional costs will be incurred as upgrades to allocated spaces currently underway on NGR trains should meet requirements if changes became mandatory.

For other modes, it is likely that there will be upfront costs and potentially ongoing costs should the changes become mandatory.

7.5 How do you address circumstances where an individual refuses to vacate an allocated seat for a person with a disability?

A comprehensive and ongoing customer education campaign would be required to be undertaken to remind passengers of their rights and responsibilities when travelling on public transport.

As mentioned in response to question 6.5, TMR is cognisant of the risks drivers face from backlash by passengers. As such, TMR would question the impact of seeking drivers "enforcing" the regulation or any penalty associated with it. This would be something that Senior Network Officers could potentially undertake as part of their duties. However, the progression of this proposal this would require greater consideration and extensive consultation with numerous government and industry stakeholders.

An effective communications campaign coupled with clear signage would support drivers.

Again – we would be keen to hear from our delivery partners on how they would see this best managed – consultation with Bus Safety Forum would be timely.

Chapter 8 – Digital Information Screens

Providers and operators of public transport

8.1 Which option do you prefer: regulatory, non-regulatory or status quo?

The DSAPT CRIS provides three options for consideration:

- Status quo: DSAPT requirements for static signs remain unchanged and will remain silent in relation to modern digital displays. Furthermore, some DSAPT references relate to static signs and are not always applicable for digital displays.
- Non-Regulatory: update the Whole Journey Guide to provide guidance on digital information screens and design considerations. Content will be added to the Whole Journey Guide to recommend particular requirements in the design of digital screens. This would include recommendations and/or guidance on screen brightness, glare, location, font and typeface, polarisation of screens and information scrolling requirements.
- Regulatory: include performance requirements in DSAPT and the Transport Standards Guidelines concerning digital screens and design requirements based on requirements prescribed in the Australian Standard 1428 suite of standards.

TMR supports the **regulatory** option for new and upgraded assets only, with the exclusion of 'in flight' projects.

Implementation should be subject to reasonable and practicable compliance timeframes.

The regulatory option will require upfront costs for TransLink's state-owned Passenger Information Display assets as well as for assets maintained by TransLink's contracted operators.

However, TMR considers that the proposed regulatory options do not adequately address the current issues. DSAPT currently requires adherence to outdated Australian Standards (for example, Standards written between 1986 and 1992), which primarily focus on large signboards for general information or wayfinding for building entrances and sanitary facilities, rather than advanced digital technologies used to provide more personalised information or instruction.

For example, clause 17.5 of DSAPT requires words or numbers displayed on electronic notices to be visible for at least 10 seconds unless for the purposes of ticket validation. In such cases, the display must cease to be visible before then if used by another person within that time. An electronic notice compliant with font size and contrast requirements that displays a card token balance presents significant safety issues for customers, especially for those with mobility constraints. A human factors assessment of the new Smart Ticketing Platform Access Gates revealed that participants, including those using walking aids, wheelchairs and mobility scooters, took an average of three seconds from the time the successful tap validation was displayed on screen to exit the other side of the gate. In this instance, a requirement aligned with the movement of the person reading the notice would be more appropriate.

TMR notes that there are significant customer experience benefits in digital displays that are user friendly for all customers. For example, they:

- provide information without the need for customers to search for that information when it needs to be accessible quickly and there is limited other support available.
- can support good accessibility outcomes, for example, by advising customers of which platform their service will depart from before they need to make their way to the platform.
- are particularly valuable for providing up-to-date information during times of disruption – keeping customers informed of the delays, the expected duration and any changes they need to make to continue their journey.
- offer greater flexibility in updating messaging quickly, where traditional media (for example, signage) cannot. They provide opportunities to update information much more quickly than we can for physical assets, which is particularly helpful if a situation is changing regularly (for example, changing

construction impacts) or we need to communicate an important message for a short timeframe (for example, for a temporary change to station access due to an emergency situation).

8.2 What are the benefits for operators and providers associated with installing digital displays with functional requirements which are user friendly for people with disability?

TMR has identified the following benefits of installing digital displays with functional requirements:

- the ability for operators and providers to provide a consistent level of service to all passengers across the whole network, including across the private and public sectors;
- ensure digital displays with functional requirements are accessible, allow the opportunity to communicate with all passengers and facilitate independent travel for an aging population and people with disability. This would increase customer confidence and the likelihood of a positive customer experience, and therefore continued patronage;
- provide clearer and agreed standards for operators to ensure consistent technical specifications;
- digital displays are an important method of communication in the event of an emergency. They are a vital function for passengers with hearing impairment or deafness;
- technology has moved towards touch screens and interactive interfaces to provide information, enable ticket/token purchases and enable fare payment/validation;
- the availability of accessible interactive displays should result in operators and providers requiring fewer human resources to provide direct assistance;
- positive reputation with the public for the operator or provider's infrastructure, information and services (and ultimately the network).

8.3 What are the barriers associated with installing digital displays to meet the needs of people with disability?

TMR has identified the following barriers for installing more/improved digital displays:

- funding limitations, for example, up-front capital for installation and operational costs of maintenance and repair;
- integration and interoperability issues with legacy backend systems;
- diverse roles/responsibilities between different parties for different digital display systems. For example, local council vs TMR vs Queensland Rail;
- contextual location concerns, for example, suitable space available for installation, potential weather impacts, glare and vandalism;
- current references in DSAPT that inform design output requirements are challenging to achieve in some digital displays, due to older equipment and limitations in how information can be displayed; and
- design considerations should ensure communications, cabling and conduct access exists to the screens. Smart features are dependent on public information systems driving the information displayed.

8.3.1 What are the upfront and ongoing costs associated with installing digital displays with functional requirements which are user friendly for people with disability?

There are significant costs associated with the design, development, installation and maintenance of accessible interactive interfaces. These costs include research and development, engineering, collaboration and consultation, human factors and accessibility usability assessments and testing, not only for the display but for the system behind it. There may also be significant cost involved for infotainment screens on rollingstock as these are made specifically for TMR by an overseas supplier.

There are also ongoing costs for software updates, maintenance, damage and malfunction as well as replacement due to vandalism. In addition, there is a risk of technological or social advances rendering the equipment outdated in the short term.

However, there are limited upfront cost impacts if the system is installed at the display's end of life or if existing systems are capable of adapting display content to align with alternative requirements.

TMR notes that the cost and the risk of redundancy of the regulatory option in the short term is likely to result in fewer devices being installed. Therefore, the focus on prescriptive interactive displays can constrain innovation and result in lost opportunities to provide a broader range of choice to customers with disabilities. However, additional costs that are incurred as a result of installing and maintaining digital displays may be offset by providing a more accessible network, resulting in increased patronage revenue.

TMR also notes that costs on certification ensure that an asset meets proposed requirements and upfront replacement costs of non-compliant assets.

Queensland Rail

Some of the cost impacts Queensland Rail will face if the regulatory option is decided include:

- an assessment of screens on the SEQ and Regional networks for luminance, polarisation and glare
- reviews of typeface selection and lines of sight at current installation locations
- screens may need to be relocated and/or replaced with new screens depending on extent of required modifications.

8.3.2 How do you currently specify design outputs to meet the needs of people with disability for digital display systems within your current networks?

Payment solutions

The Smart Ticketing Project Agreement specifies the legislative framework and required processes and artefacts, including an Accessibility Action Plan (AAP), to ensure a compliant and functionally accessible system.

Specifications are provided by the supplier for each device and associated digital display in a relevant Human Factors Sub-System Report. These reports must also provide evidence of all human factors and engineering usability assessments and a traceability matrix indicating compliance with all relevant legislative requirements. A collaborative approach is taken to engage with accessibility stakeholders throughout the process from identifying initial stakeholder requirements, designing system elements, trialling and assessing prototypes through to testing once the devices have been installed.

It is an engaging iterative process that provides a conduit for people with a physical or invisible disability or their advocates to give open and honest feedback on proposed concepts or designs and/or provide insights into the everyday issues faced when using public transport.

Infrastructure

TMR previously stipulated requirements of 22mm minimum height for liquid crystal displays (LCD) and 35mm minimum for light-emitting diode (LED) displays, typically with displays mounted to the ceiling of a bus station shelter. TMR also requires display information to be clear to read for passengers without sight impairments. For example, white text on a black background using only Sans Serif Fonts. In addition to visual displays, TMR requires an audible text to voice system that digitally reads out real-time bus service times as displayed on the screens.

Light Rail

The Gold Coast Light Rail Project Deed specifies information requirements under a schedule and Passenger Information Displays must comply with *Disability Discrimination Act 1992* requirements.

NGR trains

There is no current functionality for sound or audio for people who are blind or have low vision. The screen size is not large enough to be visible or readable from a distance for people with low vision.

The functionality to add immediate updates in the event of an emergency onto infotainment screens would be beneficial. The current process to upload new content to NGR infotainment is very slow and onerous.

8.4 With rapid changes in digital screen technology, what are the potential barriers in adopting the prescriptive regulatory requirements proposed that may inhibit implementation of future innovative digital screen solutions?

TMR has identified the following potential barriers in adopting prescriptive regulatory requirements for installing digital screens:

- updates for outdated technology on trains will incur significant costs as there are 24 infotainment screens in each train;
- the time required to take trains out of service for upgrades will have operational impacts on the network;
- most of the prescriptive requirements proposed require compliance with Australian Standards dated between 1986 and 1992. These standards are slow to change as Australian Standards committees have limited or no budget to undertake research into new technologies or test existing provisions;
- Australian Standards primarily focus on large signs for general information or wayfinding for building entrances and sanitary facilities rather than advanced digital technologies used to provide more personalised information or instruction. In circumstances where general signage requirements are imposed, strict adherence could distract, and may redirect funds, from innovative options which may provide a more accessible solution; and
- updates to DSAPT should encompass a broader approach to the provision of information to people with disability and ensure the requirements are future proofed; that is, able to rapidly accommodate change and adapt to ensure adequate coverage of technological advancements. The inclusion of minimum requirements relating to visual, audible, mobility and sensory impairments, (for example, luminance, font size, typeface, audio capabilities) must reflect up-to-date research on human interactions and modern technologies and be fit for purpose. Therefore, referencing standards such as EN 301 549, or accepted guidelines in the same vein as the Web Content Accessibility Guidelines (WCAG) 2.1, which focus on accessible digital technology, may provide better outcomes.

Additional advice

Lettering

Note that the AS1428.2 (1992) Table 2, height of letters, is typically reflective of (and designed for) static displays or signage, not digital signage, particularly for smaller text heights. Some additional content will need to be provided, potentially with a minimum letter height, to ensure letter heights for digital screens are appropriate.

For example, the individual LED dots making up the text on LED displays are too large for 6mm, 12mm, 20mm or even 25mm text height to be legible (as identified in AS1428.2 (1992) Table 2). This is less of a concern for LCD screens. TMR have previously stipulated minimum height requirements of 22mm for LCD screens and 35mm minimum for LED displays for this reason, typically with displays mounted to the ceiling of a bus station shelter.

Under the proposed regulatory option regarding cost impacts for providers with current displays that don't meet this requirement, TMR suggests additional content informing that existing displays are to be replaced to meet these requirements at the end of life. This could control cost issues for existing displays but will ensure the requirements are captured for any new displays provided.

Liquid Crystal Display (LCD) versus Light-Emitting Diode (LED)

TMR suggests LED displays are preferable for use in viewing information from further distances.

Interactive digital displays

Further to the regulatory options proposed, consideration should be given to defining digital screen requirements for interacting with displays that provide more personalised information.

ePaper bus stop trial

TMR recently undertook a trial of ePaper, which is a form of digital technology that mimics the appearance of ordinary ink on paper, at several bus stops as a potentially cheaper alternative to costly Passenger Information

Displays. Further work is being undertaken to understand how the use of ePaper might be expanded to improve passenger information across the network.

Chapter 9 – Lifts

Providers and operators of public transport

9.1 Which option do you prefer: regulatory, non-regulatory or status quo?

The DSAPT CRIS provides the following options for consideration:

- Status quo: DSAPT requirements remain unchanged without any additional lift requirements to align with the *Disability (Access to Premises – Buildings) Standards 2010* (Premises Standards) and the National Construction Code.
- Non-regulatory: expand the Whole Journey Guide to provide more specific detail on the additional lift accessibility enhancements to align with the Premises Standards and National Construction Code to ensure best practice for accessibility.
- Regulatory: amend DSAPT to provide more specific detail on additional lift accessibility enhancements to align with the Premises Standards and National Construction Code to ensure best practice for accessibility. Update the Transport Standards Guidelines to ensure consistency with the new DSAPT requirements.

TMR supports the **regulatory** option for new and upgraded assets only, with the exclusion of 'in flight' infrastructure.

Implementation should be subject to reasonable and practicable compliance timeframes.

9.2 When lifts are installed what are some of the key considerations to determine the most appropriate product?

Selection and design of any vertical transport device requires the consideration of the environment (usually already built) and the duty. This is up to the designers to deliver under certain operational constraints and conditions. TMR uses specifications for industry compliance and follows architectural requirements, however does not use a standard design for its lifts.

TMR's future key considerations when installing a lift are:

- appropriate sizing, providing through lifts so people in a wheelchair are not required to turn around;
- providing controls/buttons on each side of the internal lift car;
- providing transparent lift car sides and lift shafts to assist a Crime Prevention Through Environmental Design approach (including passive surveillance and safety); and
- maintenance call out key performance indicators in the event of breakdowns.

9.2.1 Do you have current lift specifications or standard designs?

TMR has general design parameters and generally references the current Lift Australian Standard.

9.2.2 Which standard do you currently comply with?

TMR complies with AS1735.12 (1999) for current lifts. TMR will comply with AS1735.19-2019 and 2020 /BCA 2019 Section J Part 3 / EN81-20:2020 for new lifts.

9.3 What are the impacts of harmonising the Transport Standards lift requirements with those of the NCC/Premises Standards?

TMR sees limited impacts if the new requirements are for new lifts installed from commencement of the modernised DSAPT. There will be far greater impacts if required for existing lifts in operation, which would require a lift audit on required upgrades and expected costs.

Impacts are likely to include:

- Increased delivery and maintenance costs.
- Further requirement for operational changes and training. This may trigger the question of capability and resourcing to meet those expectations from NCC and Premises Standards.

Queensland Rail

Applying proposed regulatory changes retrospectively will present significant complexities when upgrading legacy infrastructure, particularly where there are narrow platforms with already constrained access paths beside lifts. There will be structural constraints associated with modifying existing lift shafts.

9.4 If the Transport Standards lift requirements are updated to align with the NCC/Premises Standards requirements, what upfront and ongoing extra costs are likely to be incurred to meet these new requirements?

TMR is unable to quantify the upfront and ongoing extra costs but anticipates they will be significant. However, rebuild costs are significant with long construction times, which will have major impacts to the bus services. The non-busway sites will also suffer similar impacts to the local users. As for operational cost to these changes, this will have to be re-tendered with lift contractors for a variation to existing contracted services.

As with 9.3, there will be limited cost impacts if the new requirements are for new lifts installed from commencement of the modernised DSAPT. There will be far greater cost impacts if required for existing lifts in operation.

9.5 If lifts are required to be updated to align with the NCC/Premises Standards, how long will a lift be out of service?

This would require a lift audit on required upgrades and expected costs. Timing would depend on upgrade requirements. There are structural constraints associated with modifying existing lift shafts. Inevitably, any update will require a significant or total rebuild of the entire lift tower and internal cab and drives.

9.6 Do contractual lift maintenance and repair timeframes stress the fastest possible return to service?

TMR has a fully comprehensive maintenance contract that covers several key performance indicators, such as response times. However, sometimes the availability of parts can increase timelines.

Queensland Rail

A review of lift supplier and maintenance contracts would be required.

9.7 How can down times for lift maintenance and repairs be made equivalent in metropolitan and regional areas?

TMR has considered this question and has NIL response to provide.

9.7.1 Where equivalence cannot be obtained, what would be a reasonable compromise timeframe for regional areas?

TMR has considered this question and has NIL response to provide.

9.8 What is the average response time for breakdown or entrapment in regional areas?

While TMR does not have any lifts in regional areas, the average response time for a breakdown in South East Queensland is 50 minutes during business hours and 60 minutes after hours. Additionally, the average response time for an entrapment is 35 minutes during business hours and 50 minutes after hours.

Additional advice

An amendment to the regulatory option 1(b) could be considered. Rather than the current proposed text (*automatic audible information within a lift to identify the level (or platform) each time the car stops as per AS1735.12 (1999) for all lifts serving more than 2 levels*), consider removing reference to lifts servicing more than two levels.

For example, 1(b) could read: *All lifts must include automatic audible information within a lift to identify the level (or platform) each time the car stops as per AS1735.12 (1999).*

This is because most of TMR's passenger transport facility lifts only serve two levels, however, several lifts may serve varying spreads of numerous platforms, so based on the current proposal only a small number of lifts would require this important audio function. Providing this function is deemed to be best practice and a good customer experience. Commuters with vision impairment have previously requested this function to confirm they are on the correct platform to catch their service, even for lifts that only serve two levels. Additionally, it is important to provide audio level/platform confirmation to all customers as a further navigational cue.

Further consideration for alignment with Crime Prevention Through Environmental Design (CPTED) approach principles would be beneficial. Some CPTED audits may not consider vision impairment or eye height in conducting its audits or design considerations. Items such as considering the transparent lift and lift well would support CPTED principles, as would having a through lift, which allows all users to have good visibility when entering/exiting a lift.

It would also be helpful to consider how to regulate/specify the electrical supply arrangements to the lifts. There have been examples where the lift has been de-energised when a station has been de-energised for works. Consideration for emergency egress (and the most accessible emergency egress location) and how a de-energised lift might function to allow that, would be beneficial.

Chapter 10 – Website accessibility

Providers and operators of public transport

10.1 Which option do you prefer: regulatory, non-regulatory or status quo?

DSAPT provides three options for consideration:

- Status quo: No change is made to DSAPT or the Transport Standards Guidelines. The standard would continue to not reflect current industry standards, meaning the accessibility of various providers and operators' websites will continue to be inconsistent. State-based and federal policy would continue to apply concerning the requirement that government websites must conform to Web Content Accessibility Guidelines (WCAG) version 2.0, level AA at minimum.
- Non-regulatory: expand current guidance on web content accessibility in the Whole Journey Guide to include advice from the Australian Government on minimum website design. The guidance would recommend that the minimum level of WCAG compliance a transport provider or operator is WCAG 2.0 AA with consideration for WCAG AAA for some elements of their web content where practicable.
- Regulatory: include mandatory prescriptive requirements in DSAPT regarding website accessibility.

TMR supports the **regulatory** option.

Implementation should be subject to reasonable and practicable compliance timeframes.

The WCAG are an internationally recognised standard that documents how to make web content more accessible for people with disability.

10.1.1 For the regulatory option, do you prefer: sub-option 1, sub-option 2, sub-option 3 or sub-option 4?

The DSAPT CRIS identifies four regulatory sub options:

1. Websites to meet Website Content Accessibility Guidelines (WCAG), version 2.0, level AA. This is aligned to the requirements that have applied to all federal, state and territory websites since 2012.
2. Websites to meet WCAG, version 2.0, level AAA. This level of accessibility builds on AA level, with more specific requirements.
3. Websites to meet the current version of WCAG (that is, the most up to date version, for example version 2.1), level AA.
4. Websites to meet the current version of WCAG, level AAA.

Of the proposed sub-options, TMR supports sub-option 3.

Newer versions of the WCAG contain enhanced requirements which are considered industry best practice. On 11 August 2020, a working draft of WCAG 2.2 was released indicating that work had commenced on a newer version of the document. Sub-option 3 considers future proofing any requirements going forward. Furthermore, maintaining the AA requirement aligns with federal, state and territory policy regarding website accessibility.

Persons with intellectual disabilities, poor literacy and/or vision impairment need to be able to access website information easily to help them plan their passenger transport journey. Given the ever-increasing reliance on mobile phones and tablets, it is important that websites accessed through these devices meet WCAG 2.1. Achieving WCAG 2.1 AA demonstrates a commitment to passengers with a clear and practical, accessible and informative website.

At a minimum, DSAPT should reflect the most up to date version of WCAG to AA standards and The Whole Journey Guide should encourage level AAA standards where possible. By regulating minimum standards, passengers will have consistency when addressing all transport websites.

Regulatory sub-option 3 would allow agencies to keep up to date with customer expectations. However, a 12-month to two-year period should be given to agencies to update sites when a new WCAG version is released. Exemptions should be considered where it is not practicable to make certain content compliant.

10.2 Do your websites with information on public transport services meet website accessibility requirements as prescribed under Web Content Accessibility Guidelines (WCAG) version 2.0 AA?

All TMR websites are required to meet WCAG 2.0 AA as per the Queensland Government Websites Policy IS26. An audit of the level of compliance across all TMR websites and apps where public transport information is published is currently underway. However, anecdotal evidence suggests full compliance with WCAG A, AA or AAA is unlikely, regardless of the current requirements and level of processes in place.

TMR's Smart Ticketing Customer Web Portal has been designed to meet all WCAG 2.1 AA and some AAA standards.

Queensland Rail

A comprehensive digital accessibility audit will be required to confirm current website and content compliance levels.

10.2.1 What are the barriers and challenges with meeting website accessibility requirements?

TMR has identified the following barriers and challenges with meeting current website accessibility requirements:

General

- Implementation of the WCAG version 2.0 AA as per the Queensland Government Websites Policy IS26.
- Limitations are often experienced when applying corporate branding and styles to websites and apps. Many of the corporate branding guidelines are still developed based on print materials rather than digital channels. It is unusual that accessibility elements such as minimum font size, font family, and colour contrast are taken into consideration which tends to result in colour palettes and fonts not meeting WCAG 2.0 AA at minimum. If standards are being considered, other elements that contribute to web content accessibility, such as corporate branding styles, should also be included.
- Specifying the WCAG version and conformance level in the modernised DSAPT may result in a discrepancy between Queensland Government Web Standards and what is prescribed in DSAPT Standards over time. An option to address this is to have federal, state and local governments comply with relevant Government Web Standards by amending DSAPT reference compliance with the relevant government web standards for government websites. This would allow the web standards to progress and update independent of DSAPT.

Tools and technology

- Some tools and technology are not available or have limited effectiveness. Consistency of tools is required as a variety currently exist across TMR. Cost effective tools are not readily available to all content creators. Software required to make documents such as PDFs as accessible as possible, is available at a cost, if an accessible format is not readily available. Providing an online form could be another option but may be expensive to convert all existing forms to online. Tools need to encompass all aspects of websites and web content.
- These tools aren’t usually standard software offerings and additional costs are incurred which is often a barrier and results in content creators not having access to software needed to create accessible content. This includes IT specific tools for back-end and front-end developers along with content designer tools.

Resourcing and capability barriers

- Resources in supporting web environments, whether that be internal or through third party vendors, need to be structured in a way to aid accessibility compliance. In general terms, this is ensuring appropriate authority to control content quality in central publishing models and provide capability to uplift in decentralised publishing models. In addition, having managers of teams producing content to understand their obligations and help develop at point of operation will greatly contribute to more accessible compliance and presentation of information.

- Across content production at TMR, accessibility is dependent on individual knowledge and training rather than specialist accessibility roles in key fields (for example, content design or design). TMR has taken steps to address this organisationally with a dedicated team to raise accessibility awareness and capability across the organisation. The barriers faced in this approach are:
    - the tipping point of general knowledge for content creators to develop accessible content; and
    - the potential need for specialist roles/skill sets to ensure content is accessible as well as raising capability generally with content creators.
- Skills and knowledge in accessibility are expected but the high level of specialist skills and knowledge required is difficult to achieve with general resourcing and role expectations. Specialist roles are required to be established in addition to upskilling all content creators and management across the department.
- Limited capability or resources in both staff and technology to audit accessibility compliance.
- Whether the overall process from content development to publishing allows for appropriate time to ensure accessibility has been achieved. This relates to the Time-Cost-Quality triangle (that is, whether doing it quickly is more important than doing it correctly).
- How much access an organisation has to groups that can aid in co-design or review of approach to accessibility.
- An organisations ability to contract manage third party vendors to ensure compliance with legislation and government standards.

10.3 How do the current website accessibility requirements meet the needs of people with disability?

TMR's current website accessibility requirements are understood to meet the needs of the people as they are designed to comply with a recognised global standard to a level that has proven to be functional for those requiring needs for accessibility features.

TMR's Smart Ticketing Customer Web Portal has been designed to meet all WCAG 2.1 AA standards and some AAA standards. These accessibility requirements include ensuring documents and embedded images are developed within accessibility guidelines, for example, alt text, links and contrast, adjustable font.

10.3.1 How could website accessibility be improved?

TMR suggests the following could improve website accessibility:

- Clear and consistent standards and further guidance to promote a broader understanding of accessibility requirements.
- Through the Whole Journey Guide, encourage operators, providers and agencies to:
    - co-design or partner with disability groups for a thorough understanding of what works practically;
    - ensure web publishing, front-end and back-end development and digital design teams (internal or outsourced) have appropriate resourcing levels, capability, tools and/or resource specialists for accessibility;
    - raise awareness and capability across organisations around producing accessible content and branding;
    - undertake regular accessibility audits, using a variety of methods (for example, external/independent expert audits, user testing with people with disabilities, regular audits using automation tools and so on);
    - actively raise awareness of legislation, policies and processes that reinforce accessibility (and where they do not exist, implement them);
    - provide access to tools/technology to make content accessible;
    - implement higher accessibility standards (for example AAA compliance) where relevant for specific websites and/or content designed for specific target audiences;

- ensure accessibility is given the same level of importance within the organisation as other legislative compliance issues (for example, financial, security and so on);
- understand that accessibility is an ongoing activity – content and development teams should continually improve website and app accessibility;
- ensure content creators account for cognitive accessibility as a key consideration in the design process;
- ensure accessibility is written into all contracts and potentially establish third party audits to ensure compliance when outsourcing web support;
- review procurement processes and contracts to ensure compliance with WCAG 2.0 AA for IT platforms, websites, web-based applications, apps and content commissioned both at the initial launch of the product and maintained for its entire lifecycle;
- review of all corporate branding and style guides to ensure that they meet a minimum of WCAG 2.0 AA. Brands can be applied in digital channels with the understanding that the brand may not exactly replicate the poster or station infrastructure; and
- advocate via contracts for non-government websites, such as those who partner or supply to Government, to meet accessibility guidelines.

10.3.2 What are the barriers to improving accessibility requirements for people with disability?

TMR has identified the following barriers to improving accessibility requirements for people with disability:

- A reference to specific versions of the WCAG, such as WCAG 2.0 rather than WCAG 2.1, can present commercial challenges and result in limited functionality. TMR's preferred option (WCAG AA) removes that limitation. TMR agrees any changes should be future proofed to ensure DSAPT remains relevant and that new technologies and current community expectations are reflected.
- Inaccurate assumptions could be made by website owners in relation to the provision of accessible features.

10.3.3 What is the nature of feedback you receive from people with disability regarding website content?

TMR's stakeholder engagement has identified that that the quantity and format of content, readability and compatibility with assistive technologies are important for people with disability.

TMR has not received any complaints about content accessibility for the TMR franchise and website, which has around three to four million pages accessed each month. Additionally, TransLink has only received three complaints regarding website accessibility since 2017. However, complaints have been received about the MyTransLink app, specifically where customers use the VoiceOver feature.

10.4 If the current website does not meet the AA requirements, what upfront and ongoing costs would you incur to meet the requirements?

TMR has considered this question and has NIL response to provide.

10.5 If your websites were required to meet WCAG 2.1 AA requirements, what upfront and ongoing costs would you incur to meet the requirements?

TMR is currently undertaking a project to address this question. TMR does not currently have the specifics to answer. Anecdotally, as WCAG 2.1 extends to apps, the complexity and costs would be higher than complying with website compliance only.

Upfront costs for TransLink only (not all of TMR) would be approximately $60,000 to $80,000. Ongoing costs include approximately:

- $30,000 per year for auditing and implementing recommendations;
- $10,000 per year for regular awareness and capability training for around 80 communications and frontline staff; and
- $10,000 per year for accessibility tools and software licences.

Queensland Rail

Additional content such as image descriptions, audio descriptions and Auslan interpretation will need to be developed. There will also likely be significant changes to the backend functionality of Queensland Rail websites and apps.

10.5.1 What barriers or operational impracticalities will you face in meeting the requirements?

Barriers and impracticalities include:

- the use of Tableau dashboards;
- complexity with undertaking compliance audits and remedying accessibility issues for third party vendor managed websites;
- timing, for example TMR estimates it could take up to eight months to complete development and functional testing – depending on competing priorities;
- re-auditing all TMR websites and the TransLink journey planner and app; and
- change management activities.

10.6 If your websites were required to meet WCAG 2.0 AAA requirements, what upfront and ongoing costs would you incur to meet the requirements?

10.6.1 What barriers or operational impracticalities will you face in meeting the requirements?

Achieving some of the requirements to the AAA level may incur increased costs and lead times for production of some materials as these services are outsourced (for example, Auslan and extended audio description for all videos). Depending on the circumstances, it may not be feasible to achieve this for all content.

Additional advice

Accessibility has been a key consideration in designing the Queensland digital licence. During initial procurement, TMR's ARG was consulted to help assess vendor prototypes and ensure the solution met accessibility needs. More recently, Vision Australia has been engaged to help improve the design of the digital licence to ensure it meets the needs of persons with limited vision.

Workload impacts the ability to take time on each job to fully assess and remediate technical or content accessibility issues prior to publishing. TMR web publishers have assumed responsibility to remediate content currently, not the content creators. The web publishers are often not able to amend content as it has been approved for publishing and cannot be amended. Content creators often have a lack of understanding about accessibility requirements and this results in content being submitted for publishing that is not accessible. TMR suggests that The Whole Journey Guide could encourage capability uplift for content creators and an expert level of skills and knowledge for specialists to create, audit and maintain all websites, web-based applications, apps and content to WCAG 2.0 AA at minimum.

It is also recommended that further consideration and guidance be provided covering the governance of DSAPT requirements. This should include how compliance will be audited and how non-compliance will be managed. Governance and auditing of these requirements are likely to be resource intensive and it isn't clear who will be implementing the governance and auditing process and these implications will need to be considered.

Chapter 11 – Communication during service disruption

Providers and operators of public transport

11.1 Which option do you prefer: regulatory, non-regulatory option 1, non-regulatory option 2 or status quo?

The DSAPT CRIS provides three options for consideration:

- Status quo: No change is made to DSAPT and no new guidance materials are developed relating to communication during planned and unplanned disruptions. DSAPT currently refers to 'general information' but lacks a definition of what constitutes 'general information' or the potential formats of this information.
- Non-regulatory: add guidance material about communicating information to people with disability about planned and unplanned disruptions in either the Whole Journey Guide or a standalone guide. Information would include the different communication mechanisms for disruptions available, the benefits/limitations of each, and the suitability of these methods for different types of disabilities (visual impairment, hearing impairment and cognitive disabilities) and scenarios (planned/unplanned disruptions).
- Regulatory: include a new performance-based requirement in DSAPT specifying the role of transport operators and providers in communicating during planned and unplanned disruptions.

TMR currently supports the **non-regulatory** option.

The DSAPT CRIS includes two non-regulatory sub-options for the development of guidance to assist public transport operators and providers to communicate during planned and unplanned disruptions:

1. include a dedicated chapter in The Whole Journey Guide; or
2. development of a standalone guideline.

TMR supports **sub-option 2**.

TMR recognises the criticality of ensuring appropriate and accessible communication is provided for people with disability during service disruptions, particularly unplanned disruptions, as the impacts to this cohort in particular (including older people) can be profound. TMR considers that development of a standalone guideline that details this information would be sufficient to provide the recommended and consistent approach to communicating with customers with necessary flexibility to respond in different scenarios or areas.

TMR agrees that guidance material should consider 'planned disruptions' and 'unplanned disruptions' separately. There is currently less opportunity to communicate in detail during an 'unplanned disruption' in all formats.

TMR is trialling a technology solution to communicate with customers about information specific to their travel needs (see further information under question 11.3). Following the outcome of this trial and once further cost implications are understood, consideration of whether a regulatory approach would result in improved outcomes for people with disability could occur.

TMR notes that both the regulatory option and non-regulatory option 2 are likely to provide the same outcome.

11.2 What feedback have you received from people with disability regarding communication methods in planned and unplanned disruptions?

11.2.1 What key issues or themes can be identified?

Many customers experience anxiety in situations when things change, or don't go to plan. Disruption anxiety is a key pain point for customers across all modes. For customers with disability, finding out about a disruption and the consequences of a disruption are exacerbated.

Unplanned disruptions can include major network events or localised issues, such as lift or information display outages, or even operational requirements, such as platform changes which can create barriers for customers to travel. For planned changes, accurate, timely and complete information is required.

TMR had identified specific themes encountered in customer research, including:

- disruption or planned change information is not always perceived to be timely, accurate and effective;
- disruption information is not available in all formats. For example, customers with a hearing impairment may only find out from other customers' reactions that there has been a disruption because they are unable to hear audio announcements;
- there is no single source of truth, or single point of contact for a customer to find out if their journey will be accessible. Customers need to contact multiple service providers or building managers. Work is currently underway to improve information about station/stop accessibility;
- information needs include:
    - whether different elements of the journey are accessible and available;
    - if a disruption is occurring (for planning, and during travel);
    - accessibility of stations, platforms and vehicles during planning and disruptions and the provision of information through multiple channels;
    - communication is sometimes not received or received late;
    - alternative travel planning options should be provided; and
    - specific accessibility needs should be identified throughout disruptions. For example, a lift outage at a train platform may leave a customer stranded, unable to continue their journey. Notification of outages and alternative accessible options clearly communicated would avoid the risk of customer being stranded en route, or unable to commence a journey.

11.3 What types of communication do you use to communicate with people with disability regarding planned and unplanned transport disruptions?

While not specifically directed towards people with disability, all known planned and unplanned disruptions are communicated to customers via TMR's website, social media channels (Facebook and Twitter), the MyTransLink app and via e-newsletter (planned disruptions only). Information about planned disruptions is also provided to members of TMR's ARG. Information about disruptions is also available to customers who enquire via the TransLink 24/7 contact centre.

Planned disruptions are also communicated by displaying posters at affected stations/stops. For larger scale changes, Customer Liaison Officers provide face-to-face information for passengers, provide information to disability advocacy groups to share with their members/clients, and coordinate orientation/information sessions on site with these groups (for example, opening of new infrastructure or a major service/timetable change). There are further opportunities in this area, to further improve the information we provide to people with disability.

Due to the unexpected and last-minute nature of unplanned disruptions, digital channels are the main option for communicating these to customers (service notices on the TransLink website, push notifications via the MyTransLink app, social media), although information is also communicated via overhead announcements and on-the-ground staff at rail and busway stations.

TMR is currently undertaking a proof of concept trial of a technology solution that would more easily allow personalised notifications to be sent to customers during a disruption, with information tailored to their specific travel needs, patterns and preferences (for example, potentially being able to send a notification of a lift outage to passengers who have identified as having disability who travel to/from a particular station). Subject to the success of this proof of concept trial, additional investment would be required to implement the solution on a permanent basis and establish supporting datasets/ resources/processes.

<u>Light Rail Vehicles</u>

Onboard communication is generally delivered via Passenger Information Displays (PIDs). At stations, communication is also via PIDs with further support via a Public Address System, which also provides induction loops for people with hearing impairment. Printed materials are also used extensively.

<u>Smart Ticketing</u>

In addition to direct assistance and communication provided by operators, the Smart Ticketing system will utilise notifications via the Customer Web Portal, the Customer Mobile App, email and SMS, depending on the communication channels used by the customer.

Data captured via existing mechanisms relating to lifts, ramps, assistance animals, lighting, scrolling screens, augmented hearing systems, high and low platforms, accessible facilities and infrastructure and so on, will be consolidated to support the provision of those notifications and generally provide information to enable customers with disabilities to find an accessible journey according to their needs.

11.4 What additional costs have you incurred when applying and trialling additional communication methods as part of planned and unplanned disruptions?

Data needs to be sourced from multiple locations, maintained in real-time and disseminated using various channels to meet accessibility requirements around disruptions. This is complex and therefore the costs have not yet been quantified. However, it is likely to be costly both in terms of initial development costs and in ongoing operational costs.

There are also costs on certification to ensure that an asset meets proposed requirements and upfront replacement costs of non-compliant assets.

Subject to the success of the proof of concept trial (identified in answer to Question 11.3), additional investment would be required to implement the solution on a permanent basis and establish supporting datasets/resources/processes.

11.5 How do your communication methods that you use or have trialled impact people with disability?

Feedback from disability advocates indicates that increased face-to-face, on-the-ground support is highly beneficial for customers with disability when navigating planned or unplanned changes. For this reason, for major planned changes, we will invest in additional on-the-ground customer support, through the use of Customer Liaison Officers.

TMR's current heavy reliance on digital channels during unplanned disruptions can be challenging for some customers with disabilities to access if they do not meet accessibility standards. This includes colour contrast, clear text, alt text used to describe image and captions on videos, which are factors taken into consideration in the design and formatting of TMR's disruption messages.

11.6 How can communication be improved during planned and unplanned disruptions?

TMR suggests the following communication methods to improve communication during service disruptions:

- providing more timely, relevant and accurate information is key. The tolerances of customers with disabilities is lower than that of customers without disabilities, and the consequences are greater. There is a need to inform customers of changes and outages (in particular, lift outages) with sufficient notice to allow them to make alternative travel plans;
- providing one-source-of-truth accessible information through several means. For example, the Customer Web Portal, the Customer Mobile App, scrolling signs and public announcements;
- obtaining disruption information in a timelier manner from delivery partners;
- installing hearing loops at all major stations;
- enabling more targeted, personalised messaging across platforms at a large scale, to ensure relevant information is delivered as efficiently as possible and finding a way to target infrequent users more effectively, particularly in these times when people haven't been on the network as often and may no longer follow TMR updates; and
- improving information for customers about the accessibility features or different stops/stations to assist with determining suitable alternative travel plans during disruptions.

11.7 What barriers do you face to improving communication during planned and unplanned disruptions?

TMR has identified the following barriers to improving communication during service disruptions:

- systems require regular testing and maintenance;
- TMR relies on its delivery partners to inform about potential unplanned disruptions, however, any issues with the accuracy and timeliness of the information received has flow-on impacts/delays for customers;
- likewise, availability of timely and accurate information about the current status of lift and escalator operations. This generally requires a customer or staff member to "notice" that a lift is out of order, for a notification to be sent;
- currently, limited capacity to push personalised information to customers about disruptions and alternative travel options based on their specific needs (for example, must be wheelchair accessible) – investment in systems and data required to achieve this;
- heavy reliance on digital channels for unplanned disruptions – ability to communicate "on the ground" with either station staff or overhead announcements are limited to where these options are available (for example, not all stations are staffed or have limited staffing hours); and
- budget, resource and timeframe constraints can also limit the level of advance communication activities and tactics that can be employed ahead of a planned disruption.

Queensland Rail

- A review of current practice to ensure compliance will be needed.
- Additionally, a cross-functional multi-agency review will be needed to streamline and integrate processes for alternative access planning, disruption management and customer communications between Queensland Rail and TMR.

Additional advice

The digital licence, once available, will support push notifications to individuals or groups of users. The introduction of the digital licence will therefore provide a potential channel that may be leveraged to communicate service disruptions to customers.

Chapter 12 – Gangways

Providers and operators of public transport

12.1 Which option do you prefer: regulatory, non-regulatory or status quo?

The DSAPT CRIS provides three options for consideration:

- Status quo: DSAPT requirements for 'pontoon ramps' remain unchanged. No change is made to DSAPT text and no new guidance is issued.
- Non-regulatory: insert a guidance chapter on good practice designs for gangways into the Whole Journey Guide to better articulate the performance requirements for gangways. The Transport Standards Guidelines should also reference the Whole Journey Guide, as a gangway chapter in this can provide context and an expanded informative material for gangways.
- Regulatory: amend DSAPT to provide mandatory prescriptive requirements and the Transport Standards Guidelines are updated with performance-based and advisory elements to support the proposed new regulations.

TMR currently supports the **non-regulatory** option.

The non-regulatory option is considered the most appropriate approach at this stage. It will provide important additional guidance and acknowledges the design constraints for gangways, which is an advancement on the current DSAPT.

TMR considers that there could be merit in implementing a regulatory approach, but clarity is required on the feasible and sustainable co-designed solutions discussed in the CRIS before support for the regulatory option can be considered. It is anticipated that the outcomes from this consultation process is likely to assist TMR in further determining whether a regulatory approach may be supported.

12.2 How successful is the Transport Standards in providing clarity on technical and functional requirements for accessibility of gangways connecting to ferry pontoons?

12.2.1 How could the Transport Standards be improved to reflect best practice?

TMR has considered this question and has NIL response to provide.

12.3 What are the potential upfront or ongoing costs associated with providing clarity on technical requirements to reflect best practice?

There will likely be minimal potential upfront and ongoing costs, as infrastructure project budgets already account for accessibility and *Disability Discrimination Act 1992* consultants to ensure compliance with DSAPT and relevant standards.

12.4 What are the core differences between a fixed ramp and a gangway from a design and use perspective?

DSAPT provides clear direction on the expectations associated with fixed ramp design which can be easily applied.

A gangway moves up and down with the tide and is located in a highly corrosive marine environment, which is also subject to waves and future sea level rise impacts. Meeting minimum slopes and landing requirements in DSAPT in all but very low tidal range areas is a significant design challenge for gangways. Mechanical design solutions such as self-levelling gangways and ballast-controlled pontoons are a potential solution but represent significant upfront cost, ongoing maintenance constraints and constraints in areas with any wave climate.

Chapter 13 – Assistance animal toileting facilities

Providers and operators of public transport

13.1 Which option do you prefer: regulatory, non-regulatory or status quo?

The DSAPT CRIS provides three options for consideration:

- Status quo: DSAPT requirements remain unchanged, without any provisions for assistance animal toileting areas. Currently, there are no provisions for assistance animal toileting areas in DSAPT.
- Non-regulatory: include a dedicated section on assistance animal toileting areas into the Whole Journey Guide. This would expand on the 'beyond compliance' case study concerning Brisbane Airport in the current version of the guide.
- Regulatory: amend DSAPT to provide requirements for assistance animal toileting areas to ensure best practice for accessibility. Update the Transport Standards Guidelines to reflect the regulatory change and provide further advice.

TMR currently supports the **non-regulatory** option.

TMR acknowledges that providing appropriate facilities for assistance animals is critical for people with disability who rely on service animals to access important services, education, work and other life opportunities in the community safely.

Providing specific assistance animal toileting facilities at most public transport facilities is a new concept for providers which means it may be preferable to commence with a non-regulatory approach to provide the opportunity to address implementation issues such as land, construction, staffing, maintenance and hygiene. TMR supports the non-regulatory approach initially with a potential move towards a regulatory approach over time. This will allow providers to investigate how they may accommodate these facilities within the network in the future.

Including a dedicated section on this topic in The Whole Journey Guide or Transport Standards Guidelines would be a good first step towards recognising the need to provide these facilities as part of the design process moving forward.

Queensland Rail

Queensland Rail notes that implementing a requirement for animal assistance toileting facilities will involve:

- development of a Queensland Rail/TMR standard design approach
- an assessment of all South East Queensland and regional station precincts to identify sites where no suitable public spaces are available and where property constraints may present challenges
- operational cleaning and maintenance impacts.

13.2 What considerations do you currently make for people traveling with an assistance animal on public transport?

Specific assistance animal toileting facilities are not considered during the design of public transport infrastructure.

TransLink provides an Assistance Animal Pass which allows assistance animals to ride on all TransLink public transport services (excluding Airtrain), regional *qconnect* bus services and approved regional ferry services. The pass is valid for five years from the date of issue. Guide, hearing or assistance dogs, which are certified by the Department of Communities, Disability Services and Seniors, will have a handler's identity card and do not require a TransLink Assistance Animal Pass to ride on TransLink services.

Seating in accessible areas onboard light rail vehicles (trams) have cantilevered seats to accommodate guide, hearing or assistance dogs.

13.3 What (if any) assistance animal toileting areas have you constructed on your public transport network or facilities?

No public transport infrastructure or premises provided by TMR have designated assistance animal toileting areas.

13.4 What designs did you consider and what were the deciding factors that led you to your final design?

TMR has considered this question and has NIL response to provide.

13.5 What features are available to users within or immediately outside the area?

TMR has considered this question and has NIL response to provide.

13.6 What materials did you use for the construction of the area/s? To what extent did the locations/environments where the area/s were constructed determine the type of materials used?

TMR has considered this question and has NIL response to provide.

13.7 What was the cost (or foreseeable cost) to construct the area/s?

TMR has considered this question and has NIL response to provide.

13.8 What is the cost (or foreseeable cost) to maintain and clean the area/s?

TMR has considered this question and has NIL response to provide.

Chapter 14 – Emergency Egress

Providers and operators of public transport

14.1 Which option do you prefer: regulatory, non-regulatory or status quo?

The DSAPT CRIS provides three options for consideration:

- Status quo: DSAPT does not currently reference provisions for emergency egress and this issue will continue to go unaddressed for public transport infrastructure not covered under the Premises Standards.
- Non-regulatory: include guidance on emergency egress related to public transport infrastructure in the Whole Journey Guide.
- Regulatory: include a section in DSAPT, supported by the Transport Standards Guidelines, to articulate the performance requirements of egress for infrastructure.

TMR supports the **regulatory** option for new and upgraded facilities only, with the exclusion of 'in flight' infrastructure.

Implementation should be subject to reasonable and practicable compliance timeframes.

TMR is of the perspective that emergency egress infrastructure should align with the Premises Standards.

14.2 How can emergency egress be accommodated through the use of the existing provisions of access paths?

Bus Stops and Stations

At most bus stops, the bus stop area links with adjacent access paths, providing two points of access on each side of the boarding point/waiting area. Some stop locations that include a remote boarding point/waiting area or shelter that links to the surrounding footpath via a single path would potentially require review and upgrade to provide two points of access if this was required.

At larger passenger transport facilities there is significant pavement area which generally includes several points of access/egress. Larger facilities are sometimes also required to be certified under the Building Code/Premises Standards, which should include access egress requirements.

Light Rail Stations

All Gold Coast Light Rail stations have escape paths that comply with the requirements of the Building Code of Australia (BCA) and must not rely on passenger lifts or escalator systems. All light rail stations have road bays for emergency service vehicle access and emergency help telephones. The contracted light rail provider has procedures and plans to meet Rail Safety obligations.

14.3 How do you currently accommodate and design for emergency situations at public transport sites (trams and bus stops), for example signage with emergency egress options?

Bus Stops and Stations

In most cases for smaller local bus stops, there is limited infrastructure design or signage to accommodate emergency situations as typical design accommodates egress access paths for a person to be able to escape.

For medium size facilities (for example, those that are not governed by the Building Code/Premises Standards) there is also limited signage informing of emergency egress in the event of an emergency situation.

Light Rail Stops and Stations

Relevant light rail stop and station designs are certified in accordance with the requirements of authorities codes and standards, such as the Queensland Fire and Rescue Services, and the Building Code of Australia.

Queensland Rail

Queensland Rail does not have a defined approach to incorporating emergency egress for customers with disability in station designs.

14.4 What are your policies and procedures in place for emergency situations?

Bus Stops and Stations

For small local bus stops, there are no policies or procedures in place in the event of an emergency situation.

For medium to large facilities there are security cameras that monitor the facilities and information displays and audio announcements that are capable of providing emergency response/evacuation information.

There are also emergency Help Phones provided at most bus stations and operational/safety staff assist the public in emergency situations.

Light Rail Stops and Stations

In the case of Gold Coast Light Rail stops, both an Emergency Management Plan and Safety Management System exist.

14.5 How do you manage emergency evacuation incidents at your public transport infrastructure sites?

14.5.1 What lessons can be learnt from these experiences?

Bus Stops and Stations

At small local bus stops TMR is not made aware of an emergency situation until members of the public inform authorities.

For medium to large facilities there are security cameras that monitor the facilities and information displays and audio announcements (with hearing augmentation) that are capable of providing emergency response/evacuation information. Once alerted, operational/safety staff are dispatched to assist the public on-site in emergency situations.

There are also emergency Help Phones provided at most bus stations.

Light Rail Stops and Stations

Gold Coast Light Rail has an Emergency Management Plan. Passenger emergency intercoms exist on light rail vehicles at each doorway and at designated wheelchair locations, as well as each light rail station.

14.6 What are the complexities and additional costs in being able to provide emergency egress at public transport sites which are not covered by the Premises Standards?

TMR is of the position that complexities and additional costs would be limited when providing more than one egress access path from the boarding point/waiting area or shelter. The benefits of providing alternate safe access for commuters, particularly people with disabilities, far outweigh any complexities and additional costs.

At small local bus stops, it would not be possible to provide emergency egress components, such as emergency evacuation signage, alarms/flashing lights, help phones, announcement speakers, and hearing augmentation.

Complexities can arise when egress pathways are located on both local government and State property.

Queensland Rail

A cross-functional piece of work is needed to examine how the proposed requirements may apply to the different arrangements of Queensland Rail stations and what would be acceptable to the business as a safe means of providing emergency egress for customers with disability, including into the rail corridor.

If applied broadly, this may result changes to the footprint of Queensland Rail stations that could include things such as track realignment.

Impacts are likely to be greatest where platforms are in an island arrangement or currently have access by lifts and stairs only.

Additional advice

Consideration should be given to:

- access paths at new infrastructure having cut outs at station level of appropriate dimensions for wheelchair access in the event of an evacuation across nearby roadways;
- illuminated signage to be standard for stations, and in conjunction with signage for evacuation measures; and
- separate entry and exit points for stations.

Chapter 15 – Fit for purpose accessways

Providers and operators of public transport

15.1 Which option do you prefer: regulatory, non-regulatory or status quo?

The DSAPT CRIS provides three options for consideration:

- Status quo: No change is made to the current DSAPT text and no new guidance issued.
- Non-regulatory: amend the Whole Journey Guide to ensure access paths are fit for purpose. The Transport Standards Guidelines should also reference the Whole Journey Guide's 'Fit for purpose access path' chapter as this can provide context and expanded informative material for access paths.
- Regulatory: insert mandatory prescriptive and performance-based elements into DSAPT. Amend the Transport Standards Guidelines to reflect the proposed regulatory change.

TMR supports the **regulatory** option for new and upgraded facilities only, with the exclusion of 'in flight' projects.

Implementation should be subject to reasonable and practicable compliance timeframes.

To avoid unintended consequences, the regulatory option should include ramps, walkways and circulation areas associated with entrances and exits which must be kept clear of furniture, displays and retail features at all times. Further in respect of accessways being kept clear at all times, requirements should be clearly defined to only capture furniture, displays and retail features, and not 'platform validators' which calculate fares.

15.1.1 For 'access paths to be the principle pedestrian path of travel' do you prefer: option 1, option 2 or option 3?

The three options are:

1. Ramps and walkways must be the sole access paths provided; or
2. Ramps and walkways must be the principal path of travel and have primacy in pedestrian capacity over stairs; or
3. Ramps and walkways co-located with stairs must not have less than 50% the pedestrian capacity of the stairs at peak times and during emergency egress.

TMR supports Option 2. This option provides a Universal Design outcome and appears easier and simpler for providers to understand and implement with limited ambiguity.

15.1.2 For 'access paths to be kept clear at all times' do you prefer: option 1 or option 2?

The two options are:

- Ramps, walkways and the circulation and manoeuvring areas associated with their entrances and exits must be kept clear of furniture, displays and retail features:
    - at all times; or
    - during the operational hours of the particular infrastructure.

TMR supports Option 1. This option appears easier and simpler for providers to understand and implement with limited ambiguity.

15.2 Where stairs and ramps are co-located, what have been the observed customer behaviour or feedback that has been received about their functionality?

In many circumstances, it's been observed that ramps/walkways are generally used by people to congregate on or stand at the top/bottom of the ramp which impacts access for everyone but particularly people using mobility devices. Where retaining walls or planter boxes are provided on the sides of ramps/walkways, people tend to sit on these, impacting shorelines used by people with vision impairment.

15.3 How are accessways at public transport sites designed in to ensure direct / straight navigation that is safe and provides timely egress of passengers at all times ('fit for purpose')?

Accessway design is per TMR's Public Transport Infrastructure Manual (PTIM).

Bus Stops and Stations

Accessways at bus stations are designed to avoid hazards on ramps and footpaths, such as trees and horticulture. Slopes and stairs are also avoided where possible and inward entry and exits separate from the station are also considered.

Light Rail Stops and Stations

Along with the PTIM, accessways are also designed in accordance with the *Disability Discrimination Act 1992* and with specific Project Urban and Landscape Design Requirements.

15.3.1 At what point do you decide to provide both stairs and ramps when designing transport infrastructure?

Designing for public transport is currently done in reference to the relevant manual or standard which includes documents such as PTIM, Queensland Rail's Station Design Guide and the relevant Australian Standards and DSAPT. General guidance is that access ways should be designed so that they are fit for purpose for everyone, providing the most direct and shortest accessible path from entry to boarding point. A ramp or walkway can generally be used by anyone, whereas stairs cannot, and there should be no obstructions at all along the accessway.

This is a site-specific decision which is informed by site constraints, geometry, project budget, available land, assessment of design and construction experiences, and pedestrian flow considerations during peak hours. Stairs and ramps are both typically provided where there are site constraints and providing ramps only isn't achievable.

15.4 How would you improve accessways at public transport sites so that they are 'fit for purpose'?

Ensure quality tactile grounds surface indicators are used, and that replacement and maintenance is conducted by asset owners.

15.4.1 What upfront costs would you incur?

To improve accessways at passenger transport sites for everyone, the most direct and shortest accessible path from entry to boarding point should be provided. A ramp or walkway can generally be used by anyone, whereas stairs cannot, and there should be no obstructions at all along the access way. Typically, where ramps would be too onerous or long due to high level changes, lifts should be provided along with stairs, to give options and provide for larger capacity use.

Upfront costs would need to be determined based on site specific assessment. Cost may be limited if provided for new facilities, after the modernised DSAPT commencement date. Any upgrades to older or existing facilities would require detailed site-specific assessment to determine costs, if deemed not fit for purpose.

Additional costs may be incurred with more complex design or fit out costs, as well as ongoing maintenance and inventory costs.

Queensland Rail

Some stations will have topographical challenges, where processes will need to be developed and implemented to ensure design constraints are robustly challenged and documented. An upgrade to Queensland Rail's Station Design Manual will be needed to reflect these changes.

A guidance document for operational and maintenance staff will also need to be developed to ensure accessways are kept clear.

Additional advice

The following has been noted:

- the response for option 1 (regarding access paths to be kept clear at all times) is preferred for new facilities after the modernised DSAPT commencement date, rather than existing facilities already in service or operation;
- the response for option 1 is meant for locations where ramps/walkways and stairs are provided only. If lifts are provided due to various levels required, then a ramp would be too long and onerous for anyone to traverse so stairs may be the preferred option when lifts are provided; and
- where site or property boundary constraints do not allow for appropriate grade ramps or walkways, a DSAPT equivalent access process option can be progressed with disability groups to achieve an agreed best possible outcome.

Chapter 16 – Wayfinding

Providers and operators of public transport

16.1 Which option do you prefer: regulatory, non-regulatory or status quo?

The DSAPT CRIS provides three options for consideration:

- Status quo: The status quo option maintains the current Transport Standards provisions. The Transport Standards currently contain provisions regarding wayfinding in a fragmented way
- Non-regulatory: insert additional wayfinding guidance into the Whole Journey Guide. Alternatively, a specific wayfinding guideline could be developed to encourage consistency between DSAPT and National Construction Code (NCC)/Premises Standards.
- Regulatory: amend DSAPT to address inconsistencies between DSAPT and NCC in relation to a range of matters concerning wayfinding. Introduce new wayfinding provisions to the Transport Standards Guidelines covered in Appendix C of Australian Standard 1428 4.2 (2018): *Means to assist the orientation of people with vision impairment – Wayfinding signs*.

TMR supports the **regulatory** option.

Implementation should be subject to reasonable and practicable compliance timeframes.

Amongst other potential benefits, this option would ensure a nationally consistent approach which may assist economies of scale and foster a more competitive supplier environment.

16.2 How successful is the Transport Standards in providing enough information to designers and planners to assist in providing good wayfinding?

DSAPT is considered outdated as there is limited information for designers and planners to support good outcomes in wayfinding and signage.

16.2.1 How can the Transport Standards be improved?

Good wayfinding outcomes starts with facility design and layout coherence, and the current signage requirements may not fully correct poorly functioning designs.

DSAPT could be improved through updates to make consistent with – or linked to – the NCC and the Accessible Signage Standard. As an example, inconsistencies with the NCC makes it difficult for designers and planners to be clear on the placement of braille on signage.

As DSAPT does not refer to the Access Signage Standard, contractors continue to comply with DSAPT regarding wayfinding signage. However, DSAPT is no longer considered best practice when compared with the Accessible Signage Standard.

16.3 What do you see are the features of good wayfinding approaches to public transport sites?

TMR considers the following features in support of good wayfinding approaches:

- Human centred design approaches that consider the wider context of the location. Public transport sites do not occur in isolation from the wider environment, customers do not travel to a stop or station, but to an end destination. Often, the wider context is out of the direct control of the public transport agency or asset owner.
- Early consideration in the design of a facility and early and ongoing meaningful and genuine consultation with accessibility and disability stakeholders – fundamentally navigation should be easy to start with which can then be easily supported by wayfinding information.
- Public transport environments can present a high cognitive load for customers. Spatial orientation of the station within the wider environment and of the customer within the station can often be challenging. Anything that can help manage the ease of processing the information is useful – orientation of signage in line of sight, progressive disclosure of information along the way, colour contrast and field of vision, consistency in use of colours and branding, consideration of when to use symbols or text, consideration of competing visual clutter – overhanging trees, retail signage, and so on.

- For customers with disabilities, stations can be difficult to navigate and confusing when wayfinding is not clear or accessible. Walking distances can be exacerbated for customers who need lifts and/or escalators, as these facilities are not always at the most convenient locations. Dedicated customer orientation events for people who experience accessibility impacts and/or disabilities prior to the commencement of new passenger transport infrastructure may provide greater wayfinding awareness.

16.3.1 What feedback have you had from people with disability regarding your current wayfinding provisions?

There has been a mix of mode specific and general feedback provided from accessibility and disability stakeholders. This feedback extends to the following:

- A coherent and structured layout that conveys orientation, direction and purpose.
- The use of up to date and wayfinding signage and symbols consistent with the Accessible Signage Standard, and the use of succinct terminology across the passenger transport network.
- The use of raised text and braille anywhere there is written text, including in conveyances.

TMR recently commissioned an investigation into current wayfinding arrangements in Brisbane's and Townsville's Central Business Districts. Outcomes from this initiative may result in proposals to improve current wayfinding arrangements. The progression of any potential outcomes will require continued close consultation with respective local governments and accessibility and disability stakeholders.

16.4 What are the impacts of working with people with disability to develop wayfinding approaches?

By centring the design discussion around the lived experience of people with disability, providers can understand the issues faced and design fit-for-purpose solutions accordingly. In TMR's experience, the impacts of not engaging with people with disabilities can result in numerous negative outcomes including costly retrofitting.

Retrospective rectification works can result in significant costs and impacts to the provision of passenger transport services. Stakeholder engagement early in the design process can maximise the benefit of the investment.

A co-design methodology was successfully used by TMR for engagement with the disability sector on the NGR accessibility upgrades. Several team members who worked closely on the NGR project will share the lessons from this experience and transfer knowledge across the organisation.

Co-design is an engagement methodology that actively involves customers and stakeholders in the design process to achieve optimal outcomes. This was one of the recommendations from the NGR Inquiry, with this approach being applied to other significant passenger transport initiatives.

TMR ARG members were recently involved in the wayfinding initiative referred to above.

A number of TMR's significant passenger transport projects also establish a dedicated ARG throughout the life of the initiative.

Further to the abovementioned groups, the Queensland Government recently established the Queensland Accessibility Transport Advisory Council (QATAC). The QATAC is an independent advisory council to advise the Queensland Government on building better accessibility on transport and roads projects across Queensland. The members of QATAC have worked in fields like accessibility, construction, government policy and law, and is chaired by retired District Court Judge Michael Forde, who was Commissioner of the NGR Inquiry.

16.5 What are the issues public transport operators and providers face when trying to implement good wayfinding strategies?

There are several challenges identified by TMR that impact the ability to implement good wayfinding strategies. These challenges include the following:

- Existing infrastructure and premises can present challenges in being adapted to accommodate enhanced wayfinding strategies as a result of the investment required.
- Inconsistencies between DSAPT, specific Australian Standards and the NCC. For example, the placement/location of braille in respect of corresponding text.
- Customer research and co-design takes time and is not always built into implementation timelines.

- There is no ‘one-size-fits-all’ approach. Each location and each customer is different. What makes the experience better for one customer, may negatively impact other customers who experience accessibility impacts.
- Conversely, consistency of experience is critical for breeding familiarity and building customer confidence, however maintaining consistency across modes and delivery partners is challenging.
- Wayfinding represents one component of passenger information and network legibility which can make it challenging to balance highly prescriptive requirements against other important objectives such as the need to work within individual network/station contexts, the need to maintain brand consistency to achieve network legibility, and shared/diverse roles and responsibilities of multiple parties who own different elements of the overall experience or locality.

16.6 If the following proposed new requirements are adopted in the Transport Standards, what do you see are the upfront and ongoing costs compared with meeting existing requirements?

Likely general costs include higher design and fit out costs and ongoing maintenance and inventory costs.

Additionally, there will be internal state costs to upgrade TMR's Public Transport Infrastructure Manual and for branding, theming and signage on state owned assets.

Queensland Rail

- Additional Braille signage would be required at all South East Queensland and regional stations.
- Additional tactile ground surface indicators will be needed at all South East Queensland regional stations.
- A review and formalisation of the Queensland Rail approach to wayfinding will be needed to provide consistency with TMR's signage manual.

16.6.1 Braille and tactile requirements as prescribed in in the National Construction Code and Premises Standards

Accessibility upgrades to NGR trains currently underway will meet suggested changes to DSAPT, as per outcomes of our Braille Equivalent Access process.

From a road crossing perspective, there are no current Braille and tactile requirements. Including road crossing requirements would involve additional costs for implementation. However additional costs can be justified if benefits can be demonstrated to outweigh whole of life costs.

16.6.2 Specified provisions of Australian Standard AS 1428.4.2 concerning building and room identification; and

There would be limited costs involved as Australian Standard 1428.4.2 appears to require consistent Braille and tactile signage throughout facilities and includes the addition of entry signs at consistent locations to assist people with vision impairment locate signs, facility information and way finding content.

16.6.3 Wider use of minimum 30% luminance contrast requirements as currently required under Transport Standards Section 2.5 Poles and obstacles.

TMR anticipates limited costs as providers should currently be ensuring appropriate luminance contrast.

Chapter 17 – Tactile ground surface indicators

Providers and operators of public transport

17.1 Which option do you prefer: regulatory, non-regulatory or status quo?

The DSAPT CRIS provides three options for consideration:

- Status quo: No change is made to DSAPT or the Transport Standards Guidelines. Under this option, DSAPT would continue to provide guidance on the applications of warning Tactile ground surface indicators (TGSIs); however, will stay silent on directional TGSIs and more broadly, requirements to assist people who are blind or have vision impairment to navigate independently through transport precincts.
- Non-regulatory: update the Whole Journey Guide to provide guidance on the use of directional TGSIs. Additional information would also be included in the Transport Standards Guidelines.
- Regulatory: include mandatory prescriptive and/or performance requirements in DSAPT and the Transport Standards Guidelines. Add content to DSAPT to define the requirement for the use of directional TGSIs, adopting the requirements of Australian Standard 1428.4.1:2009. Changes will include design requirements and additional guidance on where it is expected that directional TGSIs may be used to assist vision impaired customers to navigate transport facilities in the absence of other wayfinding cues. Importantly, these requirements would also establish where directional TGSIs are not required due to the potential to interfere with mobility aids or create confusion for people with vision impairment. Changes to the use of warning TGSIs are not part of the scope of this CRIS and any amendments to the relevant sections would be dealt with in future amendments.

TMR supports the **regulatory** option.

Implementation should be subject to reasonable and practicable compliance timeframes.

The regulatory option will ensure consistency of application. The Australian Standard has significant differences to the current standard and inconsistent application may confuse people with a vision impairment.

17.2 What policies or guidelines are in place for the installation of directional TGSIs in and around public transport sites?

TMR uses its Public Transport Infrastructure Manual (PTIM) to provide information on the provisions of TGSIs, including examples of TGSI trails in typical bus station/stop facility designs. The PTIM also references the use of current Australian Standards for appropriate design and layouts. The PTIM is typically used as an overarching reference document for all public transport type projects. Design also reflects the *Disability Discrimination Act 1992*, and in accordance with specific Project Urban and Landscape Design Requirements.

The Gold Coast Light Rail Signage in open space also uses the Gold Coast City Council *Parks Interim Signage Guidelines*.

However, TMR notes that policies and guidelines cannot overrule legislation, hence the need for legislation to call up current standards.

Queensland Rail

Queensland Rail follows the proposed approach when building new or upgraded legacy infrastructure to increase consistency with all other areas of the built environment. However, a review of the current Queensland Rail approach to directional TGSIs will be needed to ensure it is aligned with any new requirements. Post-review, a definitive Queensland Rail interpretation and application of direction al TGSI requirements will require formalising.

17.3 How do you apply the requirements for directional tactiles?

TMR applies the requirements as per AS1428.4.1(2009).

Generally, each project is reviewed by dedicated infrastructure providers and subject matter experts on TGSIs proposals. The PTIM is also used as a guidance tool for all public transport type projects.

17.3.1 What are the barriers in applying the requirements?

TMR has identified the following barriers in applying the requirements:

- service providers are not responsible in many circumstances for on-ongoing maintenance of point of entry/exit signals and pedestrian crossings (these are council footpath maintenance requirements);
- ongoing upkeep and maintenance strategies for council adjacent areas, which were part of original project returned works. Some TGSI seem to have durability issues and the maintenance outcomes are inconsistent and no longer the responsibly of the transport providers. A lot of original tactiles no longer exist in council footpath areas adjacent to Gold Coast Light Rail infrastructure; and
- perceptions around when a worn or damaged TSGIs is no longer 'fit for purpose'.

TMR notes that current requirements limit overuse of directional TGSIs and provide best practice guidance and requirements on the full suite of wayfinding cues.

17.4 What data do you collect relating to complaints, the incidents of slips, trips and falls and the extent to which they are attributed to the lack of or placement of TGSIs?

17.4.1 What feedback have you received from people with disability regarding the use of TGSI's on the transport network?

TMR has received the following feedback regarding the use of TGSIs:

- positive feedback from Vision Australia around TMR's TGSI layouts and designs for bus stations, where TMR has limited the provision of directional TGSIs to boarding points and help phones. Where other TGSI applications have been provided, TMR has engaged with Vision Australia and their clients to understand the most appropriate layouts for particular locations and
- ongoing maintenance aspects needs as much consideration as the original design installation.

17.5 If AS1428.4.1:2009, Standards Australia's most recent requirements for TGSIs are adopted, what are the upfront and ongoing costs associated with meeting these new requirements, especially in relation to the application of directional TGSIs?

TMR expects additional costs would be limited as most of TMR's TGSIs already meet the requirements and new TGSIs will meet the new requirements. Additionally, directional TGSIs are only required where shorelines are insufficient. Implicit wayfinding (good design) should limit the need for directional TGSI in many instances.

However, it is likely that there may be additional costs for Gold Coast Light Rail for design and fit out as well as ongoing maintenance and inventory.

Queensland Rail

Additional TGSIs will be required at most, if not all, South East Queensland and regional stations.

17.6 What other wayfinding tools and cues do you currently implement for people with vision impairment?

TMR uses the following wayfinding tools:

- textural and colour contrast;
- audio-tactile push buttons;
- audible announcements;
- handrails;
- slip resistant surfaces;
- help phone access;
- shorelines, such as unobstructed garden beds, footpath edges and building lines; and
- braille and tactile signs may be implemented where required at key locations (for example, at stations and onboard conveyances).

TMR's PTIM references the potential use of wayfinding beacons as enhancements for blind and low vision passengers. However, this is not mandatory.

TMR is investigating new navigational technology through Proof of Concept projects using smart devices to visually and audibly navigate public transport facilities.

Chapter 18 – Passenger loading areas

Providers and operators of public transport

18.1 Which option do you prefer: regulatory, non-regulatory or status quo?

The DSAPT CRIS provides three options for consideration:

- Status quo: no changes to DSAPT and no new guidance material is issued. Passenger loading areas, such as drop off/pick up points and taxi ranks will continue to be not specifically addressed in DSAPT. However, there is an inference that loading areas need to be accessible by applying the boarding points and kerb requirements in the current DSAPT.
- Non-regulatory: expand the Whole Journey Guide to provide more specific detail on accessible passenger loading areas to ensure best practice with a whole-of-journey approach.
- Regulatory: amend DSAPT to provide more specific detail on accessible passenger loading areas. Update the Transport Standards Guidelines to ensure consistency with the new DSAPT requirements.

TMR supports the **regulatory** option for new infrastructure only, with the exclusion of 'in flight' projects.

Implementation should be subject to reasonable and practicable compliance timeframes.

Three regulatory sub-options are identified for the number of taxi rank spaces that must be accessible:

- Sub-option 1 – the first and last taxi rank space must be accessible;
- Sub-option 2 – the first, second and last taxi rank space must be accessible; and
- Sub-option 3 – the first and last taxi rank space, as well as 1 space for every 4 spaces between the first and last space where there are more than 5 spaces, must be accessible.

TMR supports sub-option 3.

18.2 What considerations do you currently make when designing passenger loading facilities?

TMR's designs are as per its Public Transport Infrastructure Manual (PTIM), which considers the requirements of the *Disability Discrimination Act 1992*. Under the PTIM, passenger loading zones are not mandatory, only desirable.

Light Rail Stops and Stations

Design of the Gold Coast Light Rail included consideration for all elements of the PTIM and Project Scope & Requirements. Depending on whether a station is a key intermodal transport interchange hub, such as Broadbeach South Station, or just an intermediate stop location design, considerations will vastly differ.

The Gold Coast Light Rail Team uses a standardised 'kit of parts' for station design. Its transport integration requirements and wayfinding strategy designate which nodes/stations have passenger loading facilities incorporated into the final designs.

Queensland Rail

Queensland Rail already provides accessible kiss 'n' ride and taxi bays when building new, or upgrading older, legacy stations. This approach largely algins with the proposed reform, including compliant access path links, locating them close to entrances, avoiding the need for customers to cross any roads or driveways and providing hazard TGSIs where required.

Locating accessible passenger loading areas within 18 metres of entrances will present challenges at interchanges and legacy stations with property constraints.

18.2.1 What feedback have you received regarding the use of passenger loading facilities?

Currently TMR uses the PTIM to provide guidance on the design and integration of passenger loading facilities, including 'kiss 'n' ride' and taxi facilities, within a public transport facility.

The PTIM provides advice on how to provide good 'kiss ‘n’ ride' infrastructure including, access from the road network around a stop or station, interface between the stop or station and the 'kiss ‘n’ ride' area, and the role of 'kiss ‘n’ ride' as a key access point for people with mobility impairment.

18.3 If passenger loading can only be provided on one side of a public transport premises or infrastructure, what is the impact on passengers?

TMR's PTIM provides guidance around locating passenger loading bays as close as possible to the stop or station entrance and incorporate appropriate accessibility design features such as kerb ramps and direct access.

If a passenger loading zone is only provided on one side of a premises, access to the transport connection should still be as close as possible to the premises. However, an impact may be a longer drive time in accessing the pick-up/drop off location, if the passenger is coming from the opposite side.

Based on surrounding road connections there may be locations assessed to provide accessible drop off/pickup zones on both sides of the facility.

Depending on which direction the infrastructure faces, confusion may exist (particularly for older people) around which side to exit a train or light rail vehicle. This is particularly the case if the required exiting door direction for a trip is not per the norm as for other disembarking locations.

18.4 In the circumstances where passenger loading can only be provided on one side, what are the reasons why?

When considering local road and transport networks, pedestrian and cycle paths, local catchment areas, topography and surrounding land uses, a passenger loading zone may only be achievable on one side of a facility.

18.5 Bearing in mind the various national, state and local government guidelines on the layout of taxi ranks and passenger loading zones, what is the optimum layout of a taxi rank or passenger loading zone?

The optimum layout of a taxi rank or passenger loading zone incorporates all the required Australian Standards associated with the dimensions and envelope of the parking bay, while also including necessary access components such as kerb ramps and tactiles. Other considerations are also needed for access paths, suitable waiting areas, lighting, surveillance and signage. TMR's PTIM is currently progressing options to provide a layout drawing which incorporates these elements.

18.6 How successful are AS2890.6-2009 and AS2890.5-2020 in providing good templates for the design of accessible taxi ranks and passenger loading bays?

AS 2890.5-2020, section 4.5.2 and figures 4.2 to 4.7, provides good consideration and specification toward various arrangements for a parking space that includes the necessary road and pavement requirements. However, further guidance could be provided around how to incorporate waiting facilities, signage and tactiles within the design.

18.6.1 How can this be improved?

TMR's PTIM is currently progressing options to provide a layout drawing incorporating these elements.

18.7 What costs would you see associated with ensuring that the Transport Standards requires all taxi ranks and passenger loading zones at public transport premises and infrastructure to be accessible?

Audits of existing facilities would need to occur to determine associated costs to ensure their accessibility. However, the key elements in achieving an accessible facility and meeting Australian Standards may involve costs to widen bays to achieve the 3.2m requirement, install kerb ramps and a compliant landing, provide connecting footpath, possible relocation to achieve better grades at the boarding and manoeuvring areas, as well as ongoing maintenance and inventory costs. Costs for these upgrades would be borne by the provider/asset owner, including for example TMR, Queensland Rail and local governments.

Queensland Rail

An audit of kiss 'n' ride and taxi zones will be needed to understand the scale of impacts from the proposed requirements.

Additional advice

Section 3(a) recommends nominating a distance of 18m between the boarding area and the main entry point to a transport facility (based on clause 7(e) of AS1428.2-1992). However, this could be difficult to achieve across the network. TMR suggests not specifying this requirement.

Given site constraints, geometry and other factors such as land tenure/ownership in an urban environment, it is difficult to achieve set distances between a stop/station and a facility or service. To account for this, TMR's PTIM provides guidance, through the Access Hierarchy, on how to prioritise different modes of transport arriving at the stop/station.

The PTIM currently provides guidance toward locating passenger loading bays as close as possible to the stop or station entrance. Under the access hierarchy, interchange and feeder services are a higher priority than taxi and 'kiss 'n' ride', therefore further limiting the available distance for passenger loading zones to an entry point.

Chapter 19 – Provision of information in multiple formats

Providers and operators of public transport

19.1 Which option do you prefer: regulatory, non-regulatory or status quo?

The DSAPT RIS provides three options for consideration:

- Status quo: DSAPT requirements for the provision of information will remain unchanged. Currently DSAPT does not address online information, however it does make reference to providing information in a customer's 'preferred format'.
- Non-regulatory: update and consolidate the Whole Journey Guide to clearly articulate the range of formats public transport information needs to be provided to people with disability.
- Regulatory: include mandatory prescriptive and performance requirements in DSAPT concerning alternative formats that must be used to provide information to customers.

TMR currently supports the **non-regulatory** option.

TMR acknowledges that it is critical for information to be provided in multiple formats to ensure people with varying forms of disability and impairment have access to the information they seek and need. In TMR's view, the non-regulatory option will provide additional detail/clarity on recommended alternative formats and minimum types of information that need to be made available, but provides enough flexibility to accommodate change as new options become available over time. The mandatory prescriptive and performance requirements under the regulatory approach may limit the flexibility that will allow providers and operators to implement new and best practice.

Additionally, the makeup of TMR's passenger transport delivery partners varies in terms of the size and extent of their operations within their service contract areas particularly in regional and rural Queensland. Applying regulatory requirements on all contract passenger transport operators may have the potential to create significant financial impacts for smaller operators, which may impact viability and service provision. TMR acknowledges that all people, irrespective of location, have the right to expect accessible passenger transport services and suggests that scalability thresholds could be developed, for example, that take into account variations in the size and extent of contracted passenger transport operations and operators.

19.2 What alternative formats of information, other than online formats, do you utilise?

TMR uses the following alternative formats of information:

- signage and guidance on payment methods/ticket validation;
- instructional braille and tactile text label on validation devices;
- print formats such as handheld and stop timetables, posters, brochures, flyers, static billboards, advertising, stickers/signage at stops/stations and on-board services and so on;
- face-to-face customer service via staff on network, at stations or visitor information centres, and information sessions; and
- audio such as 24/7 contact centre access (including on hold messages), overhead announcements at key stations/train services, radio media and on hold messages.

Queensland Rail

Queensland Rail provides information in many channels outside of apps and websites including:

- hardcopy timetables and brochures
- signage
- customer information screens
- assistance phone and next rain information pedestals

- PA announcements
- direct assistance from staff.

However, many of these are not available at all stations and trains in an integrated way.

19.3 What information do you currently produce in alternative formats that is readily available for a customer on request for content that is available only through digital means?

TMR customers are able to request information via the TransLink 24/7 contact centre. Staff can either directly provide information over the phone or arrange for information/materials to be sent to customers who cannot access it via digital channels. Currently, TransLink produces regular email newsletters. These are not currently produced in non-digital format, however, a copy can be printed and mailed upon request via the TransLink contact centre.

In the majority of cases, information is available in both digital and non-digital formats (for example, printed timetables, fare schedules, maps and signage about upcoming track works at stations/announcements on board).

However, TMR does rely heavily on using digital platforms to communicate unplanned disruption information. Information about disruptions is available by contacting the 24/7 contact centre, where staff can answer the majority of customer enquiries and provide up-to-date information. The contact centre staff are provided with Frequently Asked Questions to ensure they can provide a wide range of information to customers on other matters. There are limited options to quickly provide unplanned disruption information in other non-digital formats due to its short, temporary and unexpected nature. However, staff on the network and the contact centre staff are able to assist customers during a disruption.

Customers will soon be able to nominate preferred language, communication mechanisms and accessibility features.

19.4 What type of requests do you receive from people with disability for alternative formats of information that is provided online that are not readily available?

19.4.1 How do you meet these requests?

TMR has received requests for:

- printed timetables/brochures/online application forms located on its website. These are mailed out upon request having called the TransLink contact centre or written to TMR;
- information about service arrival/departure times (including real-time arrival), which is located on our website/app and on passenger information displays (PIDs). However, PIDs are only installed at selected stations/stops. Customers at a stop where there is no PID can call the TransLink contact centre who can provide this information. Note that TMR has recently trialled the use of ePaper displays as a potential option to make real-time service and disruption information available at stops where PIDs are not installed.

TMR has received requests for "next stop" alerts, which are currently only available via the MyTransLink app and not currently able to be delivered in a non-digital format.

19.4.2 What are the barriers you face in being able to meet these requests?

TMR has experienced the following barriers:

- some alternative formats (including some not currently offered) are not able to be produced in house and require outsourcing to specialists (for example, Braille, Auslan). If applied to the full scope of information available via digital channels, this would result in significantly increased cost; and
- 'next stop' alerts are currently only able to be delivered via the MyTransLink app.

19.5 What are the costs associated with providing information in alternative formats when only provided in online content?

Costs vary, depending on the alternative format. Print can be cost-effective but is usually time consuming for production and delivery. Video content is very expensive, for example, two Auslan videos recently took

approximately 50 hours for an internal resource to organise, manage, collate feedback and seek approvals and the videos themselves cost over $20,000.

Likely cost areas are higher operation and maintenance system and design costs. Large scale implementation of alternative formats may be restricted to available signage, poster, information display space or limitations of existing computer systems.

Queensland Rail

To meet the proposed requirements, Queensland Rail require:

- a network-wide rollout and commitment to the ongoing maintenance of station infrastructure such as assistance phones, customer information screens, next train information equipment and hearing aid loops
- a review of all customer information channels and content to confirm online and offline information provision is equivalent for customers with disabilities.

19.6 How do you receive complaints from customers with a disability relating to the provision of information?

TransLink receives complaints through its feedback channels, including the 24/7 contact centre, the website feedback form, social media, written correspondence, its customer experience survey and other departmental research.

19.7 How can communication methods with people with disability be improved?

Customers using the Smart Ticketing system will be able to nominate preferred language, communication mechanisms and accessibility features.

Other improvements TMR can make are:

- ensure provision of options to access the same information at the same time using assistive technologies to facilitate independent travel will also improve communication for people with disability;
- increase proactive engagement with the disability community;
- improve information available to customers about accessibility of services/stations/journeys (in progress);
- continued improvement and capability development in the business, to ensure communication across all our channels are aligning with accessibility requirements and principles (for example, colour contrast and simple language);
- build capability and investment in systems to enable more personalised, tailored information; and
- continue to explore new at-stop/on-board methods of communicating service arrival/departure and disruption information.

Chapter 20 – Amendments to references to Australian Standards

20.1 Do you support the changes to the references to Australian Standards?

TMR acknowledges that the DSAPT CRIS proposes to undertake the following with regard to alignment with applicable Australian Standards:

- update as many as possible of DSAPT references to AS1428.2-1992 and AS1428.1-2001 to current Australian Standards, in a manner that imparts either no change in material outcome or only minor material changes;
- migrate as many technical references from obsolete or withdrawn Australian Standards to current Australian Standards as possible;
- align DSAPT requirements with the Premises Standards where this gives favourable outcomes and achieves consistency; and
- harmonise DSAPT Terminology with the *Disability Discrimination Act 1992* where it differs.

There are two options for consideration – to support aligning references in DSAPT with relevant Australian Standards; or not to support it.

TMR **supports** the changes to references to Australian Standards.

TMR notes that maintaining references to many external documents retains the risk of inconsistency, ambiguity, interpretation and DSAPT quickly becoming out-dated again. The modernisation of DSAPT should commit to the futureproofing of the DSAPT wherever possible.

20.1.1 If not, which changes do you not support and why?

TMR supports the changes to references to Australian Standards.

20.1.2 Do you find domed buttons at the end of a staircase to be helpful as a warning indicator?

TMR has considered this question and has NIL response to provide.

20.2 Would it be helpful if section 21.2 (Controls – passenger-operated devices for opening and closing doors) and section 21.3 (Controls – location of passenger operated controls for opening and locking doors) in the Transport Standards are consolidated as a single provision?

TMR has considered this question and has NIL response to provide.

End of Submission