

**Submission to the 2012 Review of the Disability Standards for Accessible Public Transport 2002
(Transport Standards) Issues Paper**

Response to the Department of Infrastructure and Transport addressing the questions in Section C, page 9: 'For disability sector and public views'

Submission from the Disability Advisory Committee of the City of Greater Geelong

Responses.

1. Has your accessibility to public transport improved since the commencement of the first Transport Standards review in 2007?

Yes, some aspects of transport have improved, and there are clearly plans in place for incremental changes to be made that will assist access and inclusion.

How has your accessibility to conveyances (eg trains, buses and coaches, trams, ferries, wheelchair accessible taxis and aircraft) changed? Can you provide examples?

1.1 Some very welcome improvements have been the improved physical access to conveyances, e.g. low floor buses, Wheelchair Accessible Taxis, wheelchair spaces available in trains.

1.2 Geelong Central Station. Barriers to access at Geelong Central Station are an ongoing matter of frustration to the Geelong community. Ongoing approaches for universal access documented over 20 years to successive governments have been fruitless.

The current station building, constructed in 1877, still has stairway and bridge access only between station buildings and platform 1 across to platforms 2 & 3. This is a serious barrier to access. There is a high volume of daily patronage on the Geelong – Melbourne line. The 'Having a Say' conference attended by people with disability - which attracts international visitors - is held each year in Geelong (upwards of 1, 000 participants) the lack of access reflects poorly on planners and on government interest in upgrading the station to provide access. The Regional Rail link project between Melbourne and Geelong provided new stations along the route. Geelong Station remains untouched and inaccessible after many years of repeated advocacy for this station to be made accessible, the following issues need addressing urgently:

1.2.1 There is no access to Platforms 2 & 3. The primary means of access is over a historic stairway and bridge over the tracks. This is only accessible for people who are capable of using the stairs, and even then the stairs still pose a risk for people with prams and small children, those carrying luggage or transporting a bicycle. Adding additional services to Geelong simply means more people being frustrated at the lack of access to either the station building on arrival in Geelong or over to platform 2 and 3 on departure.

1.2.2 Some assistance may reportedly be sought from operations management if arranged in advance. This means being escorted to a gate leading to the tracks. The gate is then unlocked, and the person travels down a ramp over the tracks and up a ramp on the other side with a second gate needing to be unlocked. The ramps are non compliant for access, having a grade of 1:7 and 1:9 respectively. Patrons either alone or with a support person are called on to safely navigate a wheelchair or other mobility device over what is a dangerous crossing with unacceptable gradients.

1.2.3 Toilets. There is no Unisex Accessible Toilet. There are non compliant accessible toilets leading from the male and female toilets respectively. The toilets are undersized and poorly designed with fittings encroaching on the available circulation space. Door closers and doors on the toilets were identified as non compliant and requiring modification. A total rebuild is required

1.2.4 Items such as Lighting, service counters, drink fountains, kiosk dining chairs and setup of public areas require alteration or modification.

An access audit carried out in 2009 found that “the existing arrangements are both unsatisfactory and unsafe in terms of compliant access”. Nothing has changed!

A non-compliant public space mitigates against community access, living independently and having the opportunity to productively participate in the life of the community. Access, inclusion and participation in the life of the community is a right not a privilege.

How has your accessibility to information (eg, maps, timetables, announcements, etc) changed? Can you provide examples?

Following negotiations about the accessibility of bus timetables produced by Public Transport Victoria, the information is now being produced in a readable PDF format, and this is appreciated by the community who use screen readers.

Gaps still exist in terms of having information available in a range of formats. This includes:

Audible announcements for bus services at the central Geelong exchange

Captions

Alerts in visual format

How has your accessibility to infrastructure immediate to boarding a conveyance changed? (eg, any structure or facility that is used by passengers in conjunction with travelling on a public transport service). Can you provide examples?

An ongoing barrier to journey planning is a lack of consistency of national information and access across modes of transport. This poses a difficulty whether travel is undertaken interstate or between urban and rural areas. Due to varying degrees of accessibility or access to information, it is difficult for travellers with a disability to plan or predict with any confidence whether they will be able to travel across the span of the journey.

2. **What do you currently see as the greatest areas of need with regard to accessibility of public transport for people with disability? Can you provide specific examples?**

Ingress – Egress public transport

Questions sometimes arise re being able to access support for ingress or egress to transport. While there may be support at staffed urban transport points, when a sole operator is carrying out the transport, pressure of time and numerous roles can have an adverse impact on both operator and patron.

Examples of apparent refusal of services:-

Taxi services that never arrive, with drivers observed glancing at the assistance animal then driving away. There is documented information about taxi drivers being unwilling to transport a person using an assistance animal.

Refusal to allow more than a few people using wheelchairs to board a train because the space is said to be needed for others.

3. **As a public transport user, are there areas of the Transport Standards where you consider that a more specific requirement for compliance would improve accessibility?**

As outlined in the review document, there is support implementation of a mobility aid weight labelling scheme, and distribution of information on standard dimensions or footprint of devices such as a wheelchair. This would be of value to inform purchasers buying mobility devices to ensure the mobility aid will fit on various forms of public transport. The person purchasing the mobility aid needs this information at time of purchase so as not to end up with large heavy wheelchair outside the recommended footprint dimensions.

People assisting in boarding or positioning the mobility aid needs to be assured of the total weight being transferred, for safety and accessibility on transport. For example, NSW Transport: Wheelchair Accessible Taxi Measurement Protocol – total passenger and mobility device weight of 300kg, and also for example the maximum weight of a wheelchair being transported on an aircraft.

4. **To what extent do you feel that the requirements in the Transport Standards address all of the accessibility requirements for people with a disability? Are there gaps in the coverage of requirements?**

1. Recognition of a barrier and building a solution.

Increasing installation of security shields, grills and other devices maintain a necessary barrier against risk for the operator. This can be a barrier for the person with a disability attempting to seek information about travel and services (Disability standards for accessible Public Transport 2002: Equivalent Access and Unjustifiable Hardship [24 – Standards Part 33] Assistance during boarding and travelling)

5. Do you find that the current processes with regard to making a complaint or seeking information are sufficient or sufficiently responsive?

No current awareness of responsiveness or successful outcome of complaints regarding transport.

There are some alterations that would be helpful to people wishing to access complaints processes. A complaints process needs to be accessible, for example written in Plain English, keeping information simple and in a format that can be accessed by assistive technology. For example:

1. Department of Infrastructure

http://www.infrastructure.gov.au/department/about/files/Client_Service_Charter.pdf

Client Service Charter: Not accessible to anyone using assistive technology (screen reader)

The document is in PDF format with no Word copy alongside

The tables and frames in the document are likewise not necessarily accessible and a plain print copy is required

2. Public Transport Victoria

<http://ptv.vic.gov.au/customer-service/feedback-and-complaints/?print=1>

Form not accessible by screen reader and instructions may be difficult to understand as they are not written in a straightforward manner or in plain English, e.g. "Feedback is categorised and prioritised", and "If your feedback relates to another public transport organisation, check useful contacts to contact that organisation in order to facilitate a quicker response".

3. Public Transport Ombudsman Victoria

<http://www.ptovic.com.au/make-a-complaint/complaint-form>

Public Transport Ombudsman has a form format with the information identifier in the field which is helpful. The amount of instruction and options on the web pages could prove confusing to an individual working through the steps.

4. Airline Customer Advocate

<http://www.airlinecustomeradvocate.com.au/General/LodgeComplaintPre.aspx>

White on black print on headers is hard to read

Form to register a complaint may not be available via assistive technology

6. As a body representing the views of people with a disability, do you have any specific responses or perspectives with regard to the issues raised in the questions above?

No response.

7. Other key issues you would like to see addressed?

7.1 A more standardised approach to simplify differing transport access methods in every State, e.g. equipment, ticketing, arrangements for travel of a person with a disability and any aids they may require during and after the journey.

7.2 Transport user code of conduct

Suggest ongoing education promoting cooperative behaviour by the public to all passengers including people with disability.

7.3 Assistance

Re: (Moving People: Bus and Coach Operator Guidelines Accessible Public Transport Standards under the Disability Discrimination Act: What do I tell my driver about providing assistance: Standards Part 3.2)

People with disability can call on the driver to assist. As previously outlined, calling on the operator to undertake an increasing role will at times reach a 'pinch point' and the person with a disability may not experience equal access. People with disability need the understanding and cooperation of the people operating the service and also the owners of services to feel included in the life of the community.

7.4 Accessing allocated accessible or wheelchair spaces

Example

Rural Trains: The allocated wheelchair spaces on rural (e.g. Geelong) trains are not always available as the spaces are blocked by bicycles being parked in the allocated bays.

Example

A person using a wheelchair is booked to speak at a forum launch and plans to catch the best bus to arrive at the forum in a timely manner. When the bus arrives, the driver opens the bus door to tell her that there is a bus following on in 15 minutes, and that she should catch that

bus. In any case he is in a hurry to get schoolchildren to school on time. The bus is full and the allocated space is occupied by luggage and school bags.

Question: is the allocated accessible space on the bus or train treated the same as priority seating described in the current Transport Standards (Standards Part 31) “there is no requirement to displace other passengers to accommodate the disabled passenger?”