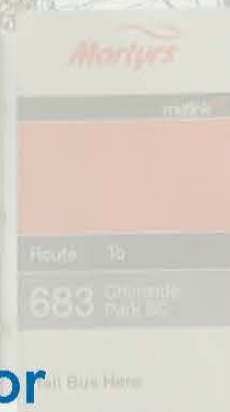


# Submission

## 2012 Review of the Disability Standards for Accessible Public Transport 2002

May 2013



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## BACKGROUND

Yarra Ranges Council is an interface Council of 2,500 square kilometres where around 148,000 people reside. It comprises both urban and rural areas which are disadvantaged by limited public transport. Transport disadvantage affects access to services such as health and community services and also to education and employment opportunities. For residents with a disability who don't have a car, poor public transport can affect all aspects of life.

Interface Councils of Metropolitan Melbourne face common barriers to social and economic development related to transport. Council has worked within its means to prioritise improved footpaths, street infrastructure and community connectedness. However the quantum of the infrastructure challenges across the municipality requires effort from all levels of government.

The review of the Disability Transport Standards is an opportunity to continue to address the challenges of limited access for people with a disability to public transport.

This submission is informed by Council's Disability Advisory Committee. The Yarra Ranges Disability Advisory Committee has taken a significant interest in the impacts of poor public transport on access. The submission highlights specific challenges remaining for public transport which require a whole of government approach.

The submission emphasises the relationship between transport and social and economic development as it affects rural and interface communities. Investment in improvements to public transport for disability access must include increased funding and shared responsibility for connecting paths and travel pathways, especially for our residents with a disability and limited mobility.

Council understands that the Department of Transport is well aware of the impacts of an ageing population and so will not detail our demographic trends in this submission but simply note that the percentage of people with age related disability is predicted to rise in Yarra Ranges as our population ages.



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A specific new transport access initiative locally, is highlighted. The 'Get Me about Website' is an initiative funded through the Victorian Government (DPCD) to develop a web based portal for accessing community and public transport. It maps routes, has a focus on providing information related to health service use and to better enabling those with limited mobility to get around.

In the past year a prototype has been built and is providing a new resource that helps build transport literacy for both residents and service providers. An additional feature, a community activities guide, is designed to promote community involvement and participation.

This project tackled an aspect of transport access not related to transport infrastructure but to people's capacity to access existing transport options and to make sense of the interconnecting modes of transport in Yarra Ranges. User testing has provided positive feedback. Responses to the website suggest that many people with a disability use public transport as their primary method of transportation. This further highlights the importance of improved public transport accessibility.

Council has also been involved in identifying transport and other barriers to health services for people in rural and disadvantaged areas. This work has brought local government and health sector partners to the table and is in its final stages. The overwhelming finding is not necessarily new, but it is compelling. Community transport providers especially those using volunteers have the capacity to break the nexus for rural communities and people with limited mobility, with only modest increases in funding from government.

It is important the review considers this portion of the transport sector as a key to improving disability transport. Integration will maximise outcomes.





## QUESTIONS FOR STATE AND TERRITORY GOVERNMENTS

### 1. **Has the accessibility of public transport within your jurisdiction improved since 2007?**

- **How has accessibility to conveyances (e.g. trains, buses and coaches, trams, ferries, wheelchair accessible taxis and aircraft) changed? Have compliance targets been met?**

Access is most affected by:

- Poor paths to bus stops and train stations, limited seating and infrastructure to support use by older residents and those with a disability. Limited way finding infrastructure. Improvements need to be developed in a partnership approach with the federal and state governments with local government and local communities informing funding allocations and design.
- There is much improvement needed in public transport accessibility. Few buses serving Yarra Ranges are accessible and this limits access to public transport. This is particularly so in rural areas where public transport is less frequent. Feedback locally is that people with a physical disability must telephone ahead to check whether buses are accessible at the time they wish to travel. Often an accessible bus is not available. Social isolation is a real consequence of this. Accessible taxis are also difficult to access with no accessible taxi based at the Yarra Ranges taxi depot.
- A very positive service is the Telebus which can provide pickup at the home if requested. This service is used by people with a disability and provides a valuable model but is only available to residents in our urban areas – it should be more widely promoted to increase patronage.
- Feedback received from the DAC and consumers suggests that waits for taxis of up to three hours for taxis are not uncommon. Taxis are, for many people with physical disabilities, their only means of transport. There is a





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need to urgently fast track the Standards to increase the numbers of accessible buses and taxis so that access is uniform.

- **How has accessibility of information (e.g. maps, timetables, announcements, etc) changed? Can you provide examples?**

As noted in the introductory remarks, the Get Me about Website represents an innovative response to transport information needs. The website has capacity to cover the whole of Victoria and is built to be maintained by a community based organisation. It has limited funding to move forward at present. Our local consultations reveal that residents have limited information about transport and that empowering individuals and their families, carers and support workers is a powerful way to break this aspect of transport disadvantage.

Council is not able to comment extensively on announcements and timetabling however we make the following observations:

- Timetables are often written in small print – increased size will improve confidence in using the PT system. As we age the numbers of users with a visual impairment will rise.
- Announcements are not useful for those who are deaf or hearing impaired. Text messaging could provide an alternative. Consider other means for a range of abilities.
- Communication by means of text, signage and audio announcements also leaves a lot to be desired.
- It is an often reported experience that train outages are poorly managed by staff in terms of communicating with stranded passengers. Improved customer relations, with a focus on the requirements of people with a disability, through better planning in relation to outages or delays is required.
- Timely and consistent communication of changes to schedules is essential, particularly for people with a disability who must reorientate themselves to different areas to board public transport. Stronger Standards need to be developed in regard to communication to ensure people with a disability are not disadvantaged.



We note from our consultations that some announcements are visual and audio to assist those with vision impairments and those who are hearing impaired. However there appears to be a great deal of inconsistency in how these announcements are managed.

Some examples are:

- Text messages and smart phone apps have become increasingly popular. These in particular are useful for the deaf. Feedback received from consumers suggests that these text based announcements often come too late.
- Visual announcements are also inconsistent. We have received feedback that there are times when visual announcements simply instruct the reader to “listen for announcements.” Clearly for people with a hearing impairment this causes disadvantage.
- Timing of announcements can also impact on access for people with physical disabilities. If ample time is not provided it often means that the person with a physical disability is disadvantaged in getting to rescheduled departure areas and can be left behind.
- Consideration should also be given to the language used in announcements. These announcements should as much as possible be in Plain English and free of jargon to assist people with intellectual and learning disabilities. Announcements should be clearly spoken at an appropriate pace to ensure comprehension by people of all abilities.

Consideration in the Standards of systems improvements to require clear and consistent communication in both audio and visual means to address the various needs of people with a disability is recommended.





## QUESTIONS FOR PEOPLE WITH A DISABILITY, THEIR REPRESENTATIVE ORGANISATIONS AND THE COMMUNITY

The Yarra Ranges Disability Advisory Committee of Council (DAC) has informed the following responses to the consultation questions.

- 1. How has your accessibility to infrastructure immediate to boarding a conveyance changed? (e.g. any structure or facility that is used by passengers in conjunction with travelling on a public transport service). Can you provide examples?**
  - Access has not substantially changed with the exception being the increased numbers of low floor buses and the improvement super tram stops have delivered.
  - Physical access to trains has improved but there needs to be better information as to the processes people with a physical disability must know in order to board trains. Signage indicating such would be useful. This could be addressed through the Standards.
  - Access to disabled taxi services still has much to be desired. In particular the boundaries for metropolitan Melbourne have serious impacts for people with a disability living in areas of Yarra Ranges beyond in the rural the taxi boundary – this is the majority of our geographic area. There is limited service coverage and for some areas no coverage. As taxis are often the only option for transport with buses not running Sundays and Public Holidays this is an area for urgent action.





**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?**

- **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?**
  - All aspects of accessible infrastructure remain a challenge: the DAC notes poor use of tactiles, poor seating and lighting, unclear pathways and poor access for wheelchairs as obstacles to access.
  - There needs to be specific and consistent compliance requirements in regard to alternative communication and announcements to lessen disadvantage for people with a disability.
  - Clear standards need to be set for the achievement of accessible transport such as numbers of accessible buses and taxis. This needs to be consistent across public and private modes of transport. Such a standard must be at a level with comparable countries. We can model countries that have much better disability access than Australia.

**3. 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?**

- **There are many gaps listed but not limited to those below:**
  - The number of accessible buses, taxis, trams still leaves a lot to be desired.
  - The Standards need to be tightened to outline clear timelines for delivery of full access and replacement of outdated infrastructure.
  - Communication methods which include alternative formats, timing of announcements, types of announcements and consistency of announcements need to be given greater attention.



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- Physical access to stations, bus stops, tram stops, taxi ranks and similar infrastructure is in great need of improvement. This includes issues such as accessible toilets, seating, lighting and boarding assistance.
- “Reasonable Adjustments” and compliance requirements are not clear. These need to be more clearly defined.
- There needs to be consistency in compliance by providers. The Standards need to reflect a tighter “time frame” for achieving full access.
- People with a disability in rural areas are particularly disadvantaged by a lack of access to public transport and taxis. It would be useful for a review of the Standards to reflect the needs of people with a disability living in rural areas and provide minimum service standards.
- Support for and the role of, community transport delivery should figure prominently in such a review.
- Consideration needed to making the Standards “prescriptive” with measures by way of fines for non compliance that are not based solely on complaints.





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

- **The DAC has noted over some time that understanding the complaints process requires high levels of skill, confidence and political knowledge which not all community members have.**
- **Consider the stronger use of advocates to support complaints processes.**
- **The complaints process is ineffective for a number of reasons:**
  - It requires a solid understanding of the Standards which many people lack. There needs to be better information about the complaints process, provided in alternative, accessible formats.
  - There is no requirement for transport providers to enter conciliation if a complaint is made. This means that often the only alternative is for the person with a disability to go to court. Although we note that the cost of such court cases is “capped” it is still an expensive process for a person with a disability to enter. This is a deterrent for people with a disability to follow through with their complaint.
  - The complaints process is cumbersome and drawn out. It contributes to positive change being slow.
  - Consideration needs to be given to “scrapping” the complaints process and developing more prescriptive compliance measures with consequences for non compliance, perhaps in the form of fines.
- Consider how to move from complaints processes, given the limitations noted already, to continuous improvement processes and customer feedback mechanisms such as social media to promote the change needed. This will not replace a complaints system but complement it.
- Consider the role in funding models and structural or systemic barriers to improving public transport for all.



**5. 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?**

- Seek the advice of persons with a disability as a priority and utilise simple engagement techniques to understand the lived experience of people with a disability. Consider how to better link local transport providers with consumers and people with a disability to get better localised outcomes.
- Investment in improved access will have long term economic and social benefits beyond the costs of the investment.
- The complaints process of the DDA is ineffective and disadvantages people with a disability. It needs urgent review to streamline and make more accessible.

## OTHER KEY ISSUES YOU WOULD LIKE TO SEE ADDRESSED?

**The DAC identifies these additional issues:**

- A greater focus on the inter-related nature of transport: walking, cycling, public transport, community transport and private cars to work towards better integrated transport routes and modes are needed urgently. Maximising the contribution of each transport component will increase access for all and includes:
  - accessible paths connecting to Public Transport
  - better resourcing of the community transport sector
  - more equitable allocation of disabled parking permits (green and blue permit systems)
  - equitable access to taxis including wheelchair accessible taxis for rural and interface areas.
- A small grant program would support capacity and skills development for disability advisory committees and ensure local voices are well resourced in their advocacy.