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**SUBMISSION TO 2012 REVIEW OF THE DISABILITY STANDARDS FOR ACCESIBLE PUBLIC
TRANSPORT 2002 (TRANSPORT STANDARDS) ISSUES PAPER**

Introduction

Since 2009, I have been a member of the Public Transport Access Committee (PTAC) under the auspice of the Department of Transport, State Government of Victoria. I am employed as an Orientation and Mobility Specialist for Vision Australia – blindness and low vision services, having been based in various offices around Melbourne and Brisbane. Over the years, I have provided specialised information regarding accessibility issues around blindness and vision impairment to various projects with stakeholders including: Department of Transport, State Government of Victoria and its transport operators; VicRoads – South East Metropolitan Region; and Australian Consumer and Competition Commission (ACCC).

Although my expertise has been in the blindness and vision impairment field, my role as a PTAC member has seen my involvement in various consultation sessions. This has enabled me to have a greater understanding of the barriers faced by many people who have a disability to access the public transport network.

SECTION C: For disability sector and public views

Q1) Has your accessibility to public transport improved since the commencement of the first Transport Standards review in 2007?

Physical Access

Physical Access to the modes of transport and boarding areas has improved since 2007. However, clear guidance is required for stakeholders in regards to the requirements of interconnections between the different modes of transport. For example, bus stop, railway station and tram stop interchanges. When redeveloping/retro fitting an area, a more co-ordinated approach is required by all stakeholders. Currently confusion between stakeholders and their responsibilities exists which create difficulty in providing consumer feedback for improvement. For instance, a controlled pedestrian crossing over a major road is a barrier between the railway station and tram stop, in turn a barrier to public transport in someone's ability to get to a desired location. Unfortunately, the pedestrian crossing in this example, is the responsibility of either VicRoads or the local council and not under the jurisdictions of the Public Transport Department of the State Governments.

Way finding mechanisms between the modes of transport should be planned and should consider issues such as: Tactile Ground Surfaces Indicators (TGSI) placement; access paths; ramps and pram ramps; both text and symbol signage; and accessible controlled pedestrian crossings.

Information Access

Static - Planning. Off journey information

Information access in terms of timetable access has improved since 2007. It is important to understand that information in tables and/or PDF formats are not accessible to screen reading software that is commonly used by people who are blind or vision impaired. Either a Word (.docx) or Rich Text Format (.rtf) should accompany any PDF document when disseminating electronic information. For example, most of the projects listed on the Public Transport Victoria (PTV) website, have only PDF files attached to the project.

Alternative formats such as audio, should be included as an available requested format. As technology improves, the amount of audio devices has increased and has improved in quality. This has resulted in audio becoming a major format type for people who are blind or have low vision. Audio would also benefit people who are dyslexic or illiterate. Anecdotally, requests for alternative formats have taken a large amount of time from the initial request to the consumer receiving the materials. It is pivotal that materials can be provided in a timely manner. In some instances this process has taken up to 8 weeks to complete.

Dynamic – on route information

Most railway stations have the ability to provide quality (information and sound clarity) audio announcements. However, many announcements are made as the train has left or is on the platform. For many, this does not provide commuters with enough time in order to take appropriate action. For instance, the Equal Opportunity and Human Rights Commission action against Metro by Annemarie Kelly. Please refer to appendix 1 – article from The Age 5th April 2012.

Providing the incorrect information can be more difficult than the absence of audio announcements. For example, the station announced is Kananook and the train is actually at Seaford station. Kananook station is an island station where the Seaford station is not. Although the door will not open on the non-platform side, the information causes panic and anxiety for commuters who may have difficulty reaching their intended destination. **Audio announcements must be accurate.** Please refer to appendix 2 – report by Blind Citizens Australia (BCA) December 2012.

Emergency Information

Currently there is an absence of emergency procedures to costumers with additional needs. For example, a disruption to the train service, mid way between two stations. Often people in a wheelchair are unable to disembark the train without the assistance of the fire department. This causes great embarrassment and anxiety to the person involved. A person with a hearing impairment is unable to hear the audio announcement and there is no provision for visual information. A person with a vision impairment is unable to know where to go and can be easily disorientated in this instance.

Technology

A provision in DSAPT needs to include the scope of technological advances. Since 2007, we have seen the introduction of smart phone technology; in turn have increased consumer expectation of instantaneous information.

User testing for new versions of technology should be conducted as part of the natural process in any project. For example, the transition from Metlink Melbourne i-phone application to the PTV application caused great difficulty for many patrons of the network. For most, the prompt to update appeared as a regular application update, rather than an installation of a new system. As the application was not accessible with the in-built screen reader, many people who are blind or have low vision, had difficulty obtaining the previous Metlink Melbourne application.

2. 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?

Currently there are no clear directions on how key milestones are measured and who is responsible for enforcement, which makes compliance difficult to adhere to. For instance, past calculations have included to there is an accessible rate of 60% to a particular route. This number has been achieved

as 80% of the stops and 40% of rolling stock on the route are accessible, hence an accessibility rating of 60% have been achieved.

Another example is that 100% of bus stops on a route fit the accessibility standards, however there are not access paths to the bus stop themselves. This makes these 100% accessible stop inaccessible.

Accessibility should measure whole journey outcomes, including planning, on journey, and post journey.

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

Currently, there are no guidelines and consequences for non-compliance by operators and state departments. Consumers are required to make complaints in order for improvements to be made. Feedback is not often acted upon and/or replied to, which creates a feeling of disconnectedness with consumers. Legal action from these complaints often appears to be the medium where operators take the issue more seriously. This process is expensive and emotionally exhaustive for people who are attempting to live their daily lives.

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

During the recent bus accessibility trials, I was provided with the opportunity to speak with many people with a disability. In the vision impaired community, Vision Australia and Guide Dogs Victoria provide travel training. This training also encompasses the planning and use of the public transport system.

When speaking to a number wheelchair users (electric and manual), I was surprised to discover that travel training was not part of their rehabilitation program. They did not have the opportunity to be taught how to board the bus in the most efficient manner. I provided about 10 to 15 minutes of instruction to some people, which enabled them to access the bus using the various layouts.

Public Transport departments and operators should strongly consider a unit or team to teach various commuters on how to use the public transport system. Public transport training is a provision in the National Disability Insurance Scheme. This will provide good customer service and direct feedback relating to the barriers of the public transport system. Training can be for all people including: an older commuter who may have been a life-long vehicle driver and has no experience with the public transport system; scooter users; new residents and so on.

Whilst this is not the solution to all barriers, it may be an effective measure to assist people accessing the public transport system during the transition period towards better rolling stock and boarding points (station, bus stops, etc).

Conclusion

The public transport system plays an important role in the lives of many Australians.

Audio announcements, both on and off board, have been ongoing issues for many years. Appendix 3 is the Mobility Improvement Strategy 1991 by Accessible Transport Consultative Council under the auspice the Minister for Transport (Victoria) of the time. The provision of audio announcements to create equitable and accessible information has been planned and was considered as a major priority 22 years ago. The access to information barriers are being highlighted today as they were in 1991.

A change of culture is required for all stakeholders involved. Rather than looking at accessibility as a burden of the community, forecast modelling and predictions should focus on the potential financial benefits instead of the costs.

I am willing to make myself available to clarify of the discussed items

Yours Faithfully,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end.

Daniel Ong BHIthSci (O&M) (PubHIth) *LaTrobe*