



Blind Citizens Australia submission Disability Standards for Accessible Public Transport Review 2012: the public transport experiences of people who are blind or vision impaired

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This submission is available in large print, audio, Braille and in electronic formats for access by people who are blind or vision impaired.

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About Blind Citizens Australia: Who we are and why we say what we say

Blind Citizens Australia is a unique organisation that is solely made up of and represents people who are blind or vision impaired. All of our Board of Directors and our committees are required by our Constitution to be people who are blind or vision impaired. Many of our staff are also vision impaired. We have over 3000 members around Australia who are all people who experience blindness. This is why we are best placed to comment on the necessary changes that are needed to improve public transport access and inclusion in communities across Australia.

Blind Citizens Australia is funded by the Federal Government as the national secretariat to represent the consumer viewpoint of people who are blind or vision impaired and is not a service provider. In addition to our role as the national peak consumer body, Blind Citizens Australia provides information, support and assistance to people who are blind or vision impaired to advocate successfully for their needs, including in their access to public transport.

Background

In March 2013, Blind Citizens Australia held three teleconferences and sought feedback from our members on their public transport experiences over the last five years. Rather than prepare a formal submission, Blind Citizens Australia has prepared the following report which includes the direct feedback in the words of our members. The aim of this report is to provide a true reflection of the experiences of people who are blind or vision impaired when using public transport services across Australia - the good, the bad and the inequitable.

Six questions were asked of our members consistent with the questions asked in the Review discussion paper. Some members have made one or more comments for each question or have only commented on a question that is relevant to their public transport experience.

In what areas has access to public transport improved?

Many of our members who provided feedback noted that there has been some improvement in their access to public transport during the last five years.

“QR does have a consultative mechanism which someone from BCA goes to four times a year. We go through some elements during the design phase and what could improve accessibility”, **Brisbane**

“I am very glad that this transport thing in Toowoomba has improved a lot in the last five years. However we do get some strange taxi drivers that do not know where they are going”, **regional Qld**

“There has been a good increase in TGSIs [tactile ground surface indicators] in Canberra as compared to Sydney. TGSIs inside the station have gotten

better", **ACT**

"There are more accessible rail and bus stations but not throughout the whole network, only a few stations. Staff have better knowledge of how to assist people who are blind or vision impaired or people with disabilities but there is still more training needed", **Sydney**

"The accessibility of buses and not climbing steep steps to board the bus [is an improvement]. For people with vision and mobility problems, it enables people to get out. It means that they can access buses where previously this was not an option. Even for a person with a cane or dog [guide], buses with wider doorways help", **Sydney**

"Regional trains have better audible announcements, although even with the campaign by Graeme Innes of the Australian Human Rights Commission, there is still need for improvement in audible announcements... There has been improvement in staff training and awareness but there are still gaps. There are more accessible buses including in the private regional bus system"
regional NSW

"The infrastructure and information about public transport have improved especially in the tram network", **Melbourne**

"The bus services have been getting better with more services and accessible buses. Audibles on trains and buses make it easier for people who are blind or vision impaired to know where they are and which stop they need",
Melbourne

"There has been a slow increase in the number of train, tram and bus stops where TGSIs are installed. There are also TGSIs along building areas and facility upgrades at stations", **Melbourne**

"I think Skybus [a bus service which connects Melbourne airport to the Melbourne CBD] is fantastic for access to the airport. There is a good feedback and complaints system. Timetables has improved markedly",
Victoria

"I have found the phone info service for Metro Trains to be quite good. I always tell them that I'm blind and from the country. Local bus stops in Horsham have all been cemented and have tactiles [tactile ground surface indicators], I've even found bus stops that I didn't know existed", **regional Victoria**

"I perceive an increase in access cabs", **Adelaide**

"One area that is improving is having more audible announcements on trains in SA. One train line is in the process of being electrified. There are audible announcements [on existing trains which are manual] but with the newer trains, the announcements will improve. The tram is very good in providing announcements", **Adelaide**

"The new stations are better in SA and at the same height as the door which

is really good”, **Adelaide**

“[The public transport] website has been upgraded to work with screen readers [software which audibly reads text based information on a computer screen]. There are smart apps for bus stops. Technology is improving a lot”, **SA**

“The public transport has improved and increased quite significantly since 2002 and 2007. It is certainly more usable and accessible. Our train network is a shiny example of how announcements on trains should be done and can be done. Our city area transit buses also have visual announcements. There is free transport in the CBD. The fleet of buses are ever increasing to low floor accessible buses. The taxi phone app is marvellous and is accessible for people who are blind and vision impaired. PTA work really hard in making things accessible in range of formats, they are keen and have direct involvement in disability groups. They have educators which are constantly in contact with disability groups. Technology makes things more accessible. I have an app on my iPad which gives me access to buses, trains and ferries and the information I need”, **Perth**

“Things have improved a lot in WA. This could be a result of a disability group in WA about a decade ago of people with disability that could call anyone that wanted to speak with, such as people involved in the design stage of infrastructure for low floor buses, stops, secure areas to find out location of next train, audible announcements etc. Things have certainly improved”, **Perth**

“The Customer/Passenger Service Assistants from Transperth that assist people with disabilities and anyone looking for some assistance at rail/bus interchanges and assistance to get on and off public transport is a wonderful service and the staff are very aware of the needs of people with disabilities. The accessibility of the train network, including announcements and quality and cleanness of trains [has improved]. There are more buses more often on the network. Buses are used as a feeder service to the train network. Accessible infrastructure at bus/rail interchange makes it easy and safe to move around from bus/train services”, **Perth**

In what areas has access to public transport not improved?

Inequitable access to bus services, taxis and airlines were consistent themes which emerged right across Australia. The consistency of audible announcements on board all modes of public transport and at boarding points, however, was raised as one of the most significant issues in almost all states and territories in Australia affecting almost all participants who provided feedback.

Concerns regarding the regular provision of audible information are consistent with the findings of a survey conducted by Blind Citizens Australia in April 2012 which reviewed the quality and consistency of audible announcements on the Victorian public transport system. The final report, released in January 2013 highlighted that for metropolitan trains, over one in eight trips in the morning

period and one in five trips in the afternoon period had no onboard audible announcements. Trams fared far worse with 60% of trips having no audible announcements across the morning, afternoon and evening periods. Survey respondents reported that this impacted their confidence to travel safely and independently and the ability to know where they were on a transport journey – a requirement under section 27.4 of the Standards. Improvements to this section of the Transport Standards are discussed later in this report.

Provision and consistency of audible announcements

“In 2008 I visited a friend in Perth and found the train services second to none! There were reliable announcements of stations at good volume and all the train carriages had hearing loops in them which worked reliably. Although I didn't travel independently during my trip to Perth, I could see easily how it would be possible to travel safely and with confidence on my own if I learned a route well enough. In Brisbane at least, CityCat services seem to be quite accessible in that stops are announced reliably. It seems to me that the various mediums of transport have not kept up with each other regarding improvements being made, particularly regarding information about where a person is on their particular route. In Brisbane for example, we still have announcements on trains that are made inconsistently in terms of adequate volume and frequency, whereas in Perth, they are near 100% in regard to consistency both in volume and frequency! Bus services seem to be only addressing this issue now, some 11 years after the standards have been introduced! I still wouldn't travel on a bus for fear that I would be forgotten even if I asked a driver to tell me where my stop was, when technology is obviously available to make this process automatic!” **Qld**

“In Victoria, Melbourne Southern Cross [railway station] has a PA system for announcements. This works well for country trains but metro is hit and miss. Boarding a country train at an unmanned station is a nightmare especially with luggage. No help given by train staff. In Queensland, announcements at Roma and Central Stations are not consistent – it depends on [the] staff member working (there are some excellent announcers). Access is ok, most trains announce next station destinations”, **Qld**

“Announcements while on moving conveyances are still inconsistent. While information on train station platforms has become more accessible, one still hangs on for dear life hoping that the announcements on the train itself will be reliable! This is particularly an issue for people with dual sensory loss, and certainly bad enough for those who have good hearing but battle with the level of peak hour crowd noise while trying to ascertain where they are on a train at any given time! Mr Innes's Railcorp win is of course a major victory in this area, but there is still work to be done obviously to ensure that the standards are truly complied with nationally and consistently”, **Qld**

“It would be great to have assistance on large platforms with audio of which train and bus are presently approaching or on platforms. In Brisbane, the cultural centre has 4 possible platform pull-ups for each direction buses travel, but they can miss you due to the bus traffic pulling in and out regardless if you are holding up a sign with a bus number on it. Audio would be so helpful so

we can work out which bay our bus is in and this would offer greater independence. Also, trains in every state need audio cues on their platforms for which train is pulling in. Alternatively, an app might be developed which identifies which train is approaching and audio the info from a smart phone”, **Brisbane**

“There are four types of train carriages – rattlers do not have audible announcements or a PA system. The digital system on other types of trains is good. When there are no announcements, I call Railcorp while I am on the train and advise that there are no announcements and it is needed so that we can get some change”, **Sydney**

“Train announcements have not improved even with advances in technology and the AHRC case by Graeme Innes against RailCorp. The technology for announcements is on buses but the bus drivers turn the announcements off because they claim passengers don't like them. Which passengers? When did they ask them?”, **Sydney**

“I can't say that there's been tremendous advancement since 2007. There have been some improvements in announcements, especially since the Graeme Innes court case, but there is still a long way to it being totally reliable. There are announcements on platforms but that is not totally reliable also. Announcements in trains in Sydney are still pretty much non-existent. They are certainly not used on a regular basis. I still have to rely on the driver and hope he doesn't forget when he gets to the stop”, **NSW**

“The audible information identification and knowing what bus stop you are actually at. We are right on the border; we only have one bus transport provider here. Buses don't have the audible announcements. The bus driver always tells me to read the bus sign. The bus driver would never announce which bus it was or where it was going to. Here we don't have trains in this area. We only have the buses”, **Tweed Heads, NSW**

“There are a lot of trains which will not be electrified for a long time. We do get some audible announcements however there are still digital displays – unless you can read them they are useless. They are trying to announce which ones [trains] are coming up and which have passed”, **Adelaide**

“Audible announcements have improved but we still get situations where it announces the wrong stations. It has happened less often and obviously it can be frustrating on an unfamiliar train line”, **Melbourne**

“My main concerns are the lack of adequate announcements of stops on trains, trams and buses. This was absolutely terrible in Melbourne while living there” **Tasmania**

Trains

“Trains are pretty much the same as they were, the quality, the cleanliness, the announcements, the infrastructure. The TGSIs have a long way to go before they meet the needs of people who are blind or vision impaired and the lack of consistency of TGSIs at train/tram/bus stations and stops”, **Melbourne**

“Vline step up [onto the train] is still problematic for people with dog guides and mobility issues”, **Melbourne**

“When in Melbourne and using a new train route, it’s not knowing which side of the train the platform will be on”, **regional Victoria**

Trams

“Announcements on trams have not improved. There seems to be a number of tram stops where there are no shelters. They are running a lot of new trams which don’t have announcements”. **Melbourne**

“At tram stops, there are pole like tram stops in the middle of roads with no markings which are close to oncoming traffic. There are still quite a number of trams in the fleet which are not low floor and have very high steps. In the city, particularly where there are shared pedestrian and bicycle facilities, tram debarkation can be difficult as you can encounter a bike as you disembark”. **Melbourne**

“Audio announcements are a fantastic idea on trams but it is just not monitored. I think there are still inconsistencies in relation to disability awareness driver training. Yes there have been reviews, but these haven’t been picked up by the government or we haven’t been told anything about it”, **Victoria**

“We have inconsistent announcements on trams- there is only one tram line and it’s pretty hard to get lost on it but it’ll still be nice to know when to get off”, **Adelaide**

Buses

Bus accessibility is also a significant concern of our members, with members noting that the lack of direct assistance – such as drivers providing verbal confirmation of a route number – and indirect assistance – such as a driver deploying a ramp, can significantly impact on a transport journey. In addition, multiple buses which use the one stop and the development of bus interchanges which rely on visually identifying a bus on its arrival rather than each bus having its own dedicated stop, have created new access barriers for people who are blind or vision impaired.

“Improvements have occurred with buses in metro but not for distance buses. (buses with luggage compartments). This is still a real issue for longer distance travel for someone who is a little frail. This includes the design of the bus as the handrail does not go all the way. Stations also have a way to go but we can see that it [accessibility] is happening. Qld is building some new stations which include accessibility”, **Brisbane**

“I have a real issue with Translink buses - no onboard next stop announcements, no bus announcements at main terminals and I have tried holding up a bus route number to catch the driver’s attention without success. So much needs to be done. I avoid buses where possible in favour of trains. Also some drivers do not wait till seated resulting in being thrown around in

the walkway.” **Qld**

“We only have the one bus company that goes into Canberra. The buses in Canberra have almost gone backwards. Half the time you can't get the drivers to put the bus down. When it comes to the buses kneeling, there isn't any excuse for why they shouldn't be working. I put a complaint for a particular bus trip last year. It took me 7 and a quarter hours to get to a half hour medical appointment. The Australian Human Rights Commission were unable to mediate. There is no excuse for a city this size to not have audible announcements. You need to allow an extra hour travel to travel to the CBD. Honestly there isn't any bus company that is nearly as bad as the one in Canberra and I have travelled quite frequently” **ACT**

“I agree with the comments regarding buses. If I am at a bus interchange where buses line up, once one bus leaves and the next pulls up, they can go around me”, **Sydney**

“Unfortunately we have not seen any major improvements to our bus service in the last 5 years”, **regional NSW**

“I was living in the suburbs of the north shore of Sydney. The problem was that I couldn't see the bus coming and there isn't anyone to ask. Guide dogs NSW has been working on a problem that if a bus driver sees a white cane, they are supposed to stop. There is no way I can see the bus coming, I am working on a little system where I have a little flag you can carry around – but this has not made a difference if you are sitting at a bus shelter- and if it is raining there is no way the bus can see you”, **regional NSW**

“Bus drivers don't lower the ramp for wheelchair users, older people and people with disabilities or the ramp isn't working or so they claim. People who use mobility aids on wheels have nothing to stop them moving around when the buses are moving. It isn't safe for the mobility aid user or other passengers”, **regional NSW**

“Our local bus service is operated by a private company. Our local Council has no say in what degree of service the bus operator provides however Council assists in providing bus stop shelters.

It is the opinion of the local community that bus services and access to the rolling bus service leaves a lot to be desired the reason for this is a lack of access to information ie timetables, driver additional service in the way of providing assistance to the aged or disabled passengers boarding or disembarking from the bus or even providing verbal information to blind and vision impaired persons when they request information about which bus route they are providing, this is a major barrier for blind and vision impaired persons especially where there is a major bus interchange and three or four buses approach at the same time.

Re Council involvement with the bus service they do provide bus shelters in the cbd areas which have footpath and curbing and in other areas it is only a hail and ride service.

Where there is no footpath and curbing it is very difficult for older persons to step up into the bus or even when they want to get off the bus with their shopping, in some cases the bus driver will activate the access ramp for the passenger however this is not always provided or practical.

I am aware of at least one manual wheel chair user who relies on a carer for assistance who has to leave the bus a km and half before their bus stop outside of their home because the bus access ramp cannot be used.”,
regional NSW

“When a driver is driving an accessible bus that has a ramp, and he sees a person with a white cane or a lady in a pram, the ramps should be put down”
NSW

“[There are] issues for people who depend on community buses. In the regional areas, it can take a full day to get to where you need to go”, **Tweed Heads, NSW**

“Bus companies are moving to centralised bus stops where a bus will come to the same drop off and pick up point. This could mean that there are multiple buses using the one stop. There are no announcements at all. This has been introduced in the last two years and has happened in Dandenong as well”.
Geelong, Victoria

“Issue of hailing the bus and queuing of multiple buses – still the problem where buses are not waiting to go up to the front”, **Adelaide**

Taxis

The use and accessibility of taxis was also raised extensively during our teleconferences and in direct feedback from members. Waiting times, driver communication skills, poor driver awareness of how to assist a person with disability and inaccessible processes and information were flagged as continuing issues.

“Taxi prices are too high and people working for them are not getting paid enough. You can book a day ahead, but it doesn’t make a difference, you wait and wait and wait”.

“When cabs used a two way radio you could tell which is a cab or a car. If a car pulls up, how do you know if it is a cab? If you start feeling underneath their car door handle, drivers of regular cars don’t like it. NSW and SA do not have Braille numbers. VIC and WA have these. There has to be another way to identify the taxi – it’s okay if you have pre-booked a cab, but if not you don’t know”, **Sydney**

“[A barrier is] taxi drivers who have English as a second language and who won’t listen to your directions to the destination; they claim to know better and it usually costs more by going their way. The taxi drivers have trouble filling out the taxi subsidy paper vouchers”, **regional NSW**

“I think the situation with taxis is getting worse as it seems that the level of

English among taxi drivers is declining. It is impossible to communicate with them and they have no idea where the suburbs are. I think there is a lot of pressure on taxi drivers, they aren't making a lot of money and the whole landscape is changing and we need to make sure that we don't get disadvantaged by the changes. We need to make sure that there are developments for phone apps to be made more accessible", **NSW**
"I think we need to have Braille to identify the cab, reference or ID number on the passenger door", **NSW**

"I cannot read print numbers [on a taxi] even though it has been put there for blind people", **Melbourne**

"The lack of Braille numbering on taxis [is an issue]. The AHRC say we have the right to know the taxi number but in Melbourne unless we ask the driver or someone else, we don't know the taxi number", **Melbourne**

"The increased use of hybrid cars in the taxi fleet [is an issue]", **Adelaide**

A number of our members noted that their experiences with taxis have been positive largely due to calling drivers who they have previously travelled with, rather than "take a risk" on an unknown driver who may refuse a dog guide or who may have little knowledge of how to assist a person with disability. While this comes down to individual preference, it also highlights a lack of confidence in the capacity of taxi drivers to provide equitable services to a person with disability.

"I don't have trouble with taxis, I am a dog user and I only stick to the same drivers", **regional QLD**

"Taxis, we have no problem. They all know me and it's a small town, we all know each other. I can't compare with five years ago since I only lost my sight three years ago, **regional NSW**

"Taxis are fine if you have your own driver who knows you", **ACT**

Ferries

"There are no announcements on the ferries about when and where the next stop is. On the wharf there are no announcements about the approaching ferry. There was an announcement on the ferry that said to 'read the overhead sign' if you want to know the timetable. There are GPS apps that tell you where you are but they are not very reliable. We really need to be pushing announcements on ferries. It shouldn't be nearly as difficult", **NSW**

"Ferries are good - staff members at ferries are particularly helpful", **regional NSW**

Airlines and airports

"Access from the taxi rank from outside of the airport to the flight counter and needing the dog guide to find a information counter [has not improved]. There should be TGSIs from the street to an information booth", **Geelong, Victoria**

“Airports, getting from the buses to the taxi and then finding where you are in the airport”. **Tweed Heads, NSW**

“Airports – it appears that there has been no progress in terms of being able to find gates, baggage areas etc. There is no Braille signage at departure gates and it is harder to get meet and assistance with budget airlines. The Standards are very weak in regards to airports”, **ACT**

“There is no consistency in security areas regarding the use of guide dogs. It seems that they [security area] make up the rules as they go along. It is a different scenario every time I travel and there is no consistency”, **Perth**

“Being dropped off at the airport and knowing where I am. There is no assistance getting in and through the airport”, **Brisbane**

“In airports, the announcers are in most cases appalling. In many cases it is necessary to find an employee for an interpretation”, **Tasmania**

Other points flagged by teleconference participants included

- In flight entertainment – Ipads are being provided however these are not accessible to guests who are blind or vision impaired as they disable Voiceover [inbuilt software that provides voice output to enable a person who is blind or vision impaired to independently navigate the device]
- Safety instructions are provided in Braille but are not available in other formats. One to one assistance is provided by airline staff which is helpful.
- Budget airlines can have limited knowledge of disability policies

Access to infrastructure, platforms and interchanges

“Issue of gaps between the platform; some of our platforms in Sydney are actually on kerbs. The trains bend a little bit into the kerb- I don't know if there is any solution to this”, **Sydney**

“TGSIs are aligned along most of train platforms now. However something that is not done is there is no indication of when you are near stairs or an exit when you are following the TGSIs. Unless you are really familiar with the station, you will not necessarily know where the exit is”, **NSW**

“One of the things that can be improved is putting well placed numbers on each bus stop. The numbers aren't spelt out clearly enough”. **NSW**

“May I applaud the introduction of lifts at many metropolitan stations in Sydney. But I do find it hard to find the correct buttons for up-down and various platforms, usually waiting for a sighted person to enter and do the task for me. Maybe a coloured light system or larger indications would help not only myself but others. This maybe worth a mention”, **NSW**

“We are not told in advance if Transperth or Local Government are going to be working on bus stops/upgrading/construction. People who are blind or

vision impaired are not consulted about bus stop design or placement”, **Perth**

“Taxi ranks – have not seen them with TGSIs”, **Melbourne.**

“Taxi ranks not being clearly marked and not clear where you line up or if taxis pick up and drop off at different parts of the rank”, **regional Victoria.**

“Platform layouts and physical environments are worked on all the time”, **Adelaide.**

“In terms of taxis I continue to have guide dog access problems with drivers not wanting to accept my dog. I also have problems in Tasmania and Victoria with drivers not knowing locations well enough, not speaking english well enough to communicate. Tasmania still has paper vouchers for our taxi discount scheme – this should be altered to a card like Victoria to make things much easier”. **Tasmania**

Access to information, including websites

“The Transperth website is not accessible to people who use screen readers and for people with low vision or fully sighted, it is complicated to use. The website isn't accessible if using JAWS or NVDA”, **Perth**

“Information at train stations have waned a little bit as they are using a slightly smaller font on the train timetables. I cannot identify it in anyway- so I feel that has gone back a little bit”, **Perth**

“I find the phone info service for Vline to be poor. Some staff haven't been that good ie not knowing their stuff. For example, one person told me that there was only 1 bus a day from Ballarat to Geelong when there are a few services a day. As I travel more within Melbourne, I'm finding that audible announcements on trams are hit and miss particularly when you ask the driver to call out a particular stop. Accessing Vline print timetables can be tricky as the print isn't that great”, **regional Victoria**

“At Southern Cross railway station, they closed down the information booth where people who are blind used to get information for Vline train and platform location. PTV has not offered any other way of finding this information”, **regional Victoria**

Considering public transport as a whole of journey approach

“In Canberra the main transport is buses. Infrastructure upgrades to bus interchanges is an issue. For example DSAPT should look at continuity between various modes of transport. At present, a person has to journey to an interchange and cannot get to a taxi independently from the interchange due to placement” **ACT**

“When visiting Sydney, there is the inaccessibility of the metro network and being able to move from buses/trains/ferries to taxis. Some forms of transport are over 50 years old like the ferries which can't meet the accessibility requirements but the network doesn't seem to be updating. If a wheelchair

user is on the train, they can't move into the carriage; they end up at the doors with people moving around them on and off", **regional NSW**

"We only think about accessible standards within the systems we have but getting access to the system is just as key – being able to access a railway station as one example. Overall integration between bus, train and tram and in between is vital, as is pedestrian crossings; infrastructure like controlled crossings is important". **Geelong, Victoria**

"There is an expectation that people are driving or riding their bike [to railway stations] – need to go through or around fences to get to the ramps, there may be a timed crossing or no crossing etc", **Melbourne**

What are the barriers you continue to experience when accessing and using public transport or accessing information?

Barriers impeding bus use

"Buses go past at generic bus stops without stopping or knowing what bus number went past. There isn't always people around at the stop to ask about bus numbers and you can't read the timetable on a pole. It is hard to know where you are while on a bus so you don't know where to get off. The government says we have to choose from cleaning and maintenance of machines at stations to putting in audible information at stations. We should not have to barter one for the other, they should allocate enough money for both", **Brisbane**

"The goal posts are obviously changing in capital cities and I appreciate the efforts being made in these areas, but in regard to regional public transport options, there is a very, very long way to go. Not only are the announcements regarding location on buses completely unreliable, but the frequency and flexibility of busses are abysmal! One simply wouldn't even bother catching a bus anywhere unless you had a person with at least some vision with you or you were absolutely strapped financially and had no other option. You would be hard pressed even to find the stop you thought might be somewhere along your main drag if you had not had orientation and mobility lessons recently! It would not be an exaggeration to say that the failure to comply with the transport access standards in regional areas has been nothing short of incredible and pathetic! I should not have to be so aware and on alert that it stresses me out just to get to where I need to go. Therefore, I use taxis, which up until this point at least, I have been able to afford", **regional Queensland**

"At least from a regional perspective, where often there are no trains or ferries/CityCats, one wouldn't even know where a bus stop was! There are no audio or tactile indicators that I know of to determine the location of a bus stop, and even if I was brave enough to catch a bus, one wouldn't have any guarantee that the stop at which one wanted to get off would be pointed out by the driver. To my knowledge, announcements on buses, which are often the only form of regional public transport, are not automated and are only being trialed in capital cities at this point. I'm a long way therefore, from being able to feel confident that I could safely catch a bus and be guaranteed of

getting off where I intended to as far as I know. To illustrate my point, I have to say that even after some eight years after having left the city of Brisbane in which I resided, I still would feel more comfortable in catching a train independently in Brisbane than I would in catching a bus (the only form of public transport here) in the town of Bundaberg where I now live", **Qld**

"Being able to identify which bus is due or arriving at bus stops and bus stations. Buses that park behind other buses at generic bus stops and drive off without stopping at the bus stop. Hailing the wrong bus while your bus drives off or hailing vehicles that are not public transport like trucks or vans. Clearly we are people with disabilities like white cane users or dog guide users, so why do we have to hail public transport? No late night or weekend or public holiday services means that we can't go out and then become socially isolated. Non-disabled people can use other forms of transport like drive their own car as an alternative, we don't have that choice", **Sydney**.

"Getting buses to stop and knowing when you are getting close to the stop. This can be problematic if the driver does not know the route very well", **Sydney**

"The metro buses in Sydney also have announcements but they say that passengers and drivers complain about them, so they are turned off by the driver", **Sydney**

"Must public transport bus drivers (Australia wide) are trained to pull up when they see a person with a disability even if that person hasn't hailed the bus. But buses drive past the generic bus stop at bus stations if there is a bus in front of them or they are running late. [Other barriers are] inaccessible information from the website, the timetable at the bus stop or bus station to knowing which bus is arriving. Knowing when bus stops are being worked on or upgraded on and where the temp bus stop is", **Perth**

"I know a person who travels 2km further down the road where the bus changes direction so that they can access the shopping centre and do not have to cross a busy road", **Perth**

"There is an information barrier at multi bus routes. Have to ask the driver each and every time a bus arrives to determine if it is the bus you want", **Geelong, Victoria**

Barriers impeding taxi use

"The taxi subsidy cap should be reviewed or raised. Making complaints to the taxi company, they don't follow up, I don't know if they take action on complaints", **Brisbane**

"The taxi subsidy cap means people can't afford to go out. Taxi driver attitudes to women and people with disabilities and people who use dog guides are a barrier", **Sydney**

"The issue with taxis in NSW, there is still a voucher system. They trialed the card system a few years ago, but it has been going on for years and years

and nothing has happened. Issues of not knowing what is on the taxi meters I think hasn't been achieved anywhere in Australia. In New York I read that this is part of the system. You got to be totally trusting of the driver to tell us what is on the meter is true", **NSW**

"Taxis has always been an issue especially when you can't see what's on the meter- it's always a worry. I only have 1 percent vision so I can't sign on the paper and how do I know what's actually on the form - possible fraud", **Tweed Heads, NSW**

"The Taxi Subsidy paper vouchers are a barrier, because taxi drivers have trouble entering the information, the subsidy cap is a barrier because it costs too much to make regular journeys that don't have other public transport so you end up being socially isolated. Taxi drivers attitude to people with disabilities and the knowledge of the suburbs is a barrier to using taxis. Infrastructure that is old and vehicles that are old is a barrier to accessibility", **regional NSW**

"Perth taxi drivers who don't listen to the directions you give them because they claim to know a better quicker way of getting there. Taxi drivers who take you into peak hour traffic rather than using back roads or alternative roads. Poor language skills and understanding of taxi drivers and taxi driver attitudes about their passengers being stupid or that taxi drivers can pick and choose work rather than the jobs allocated to them. Taxi drivers who seem to have trouble filling out the paper taxi subsidy vouchers. Taxi drivers who dislike dog guides or simply drive past without picking you up because they see the dog guide at taxi ranks or where you are waiting after booking a taxi. The taxi subsidy cap is an issue as the metro area is larger than the subsidy. We need a taxi subsidy card instead of paper vouchers", **Perth**

"I would like to see better quality drivers for taxi. A taxi swipe card rather than the taxi subsidy voucher that some of the states use", **Perth**

"We should be able to independently know the fare being charged. The taxi should be able to inform you directly through a talking taxi meter. The Standards should reflect this and provide information in a format that you can understand. There should also be reciprocal arrangements of taxi subsidy cards – ie. being able to use interstate", **regional Victoria**

"Cab vouchers are a huge issue. Although I as a wheel chair user get 75 vouchers, these are very limited and if I got unlimited 50% vouchers this would be as huge improvement", **SA**

Access to information, including announcements and real time updates

"Not knowing or being able to access timetable and route information, also access to Roma St Station can be difficult due to people standing on the footpath waiting to catch both public and private buses" **Qld**

"The audible announcements on trains are sometimes not on or not working or if they are on, the train driver presses the wrong station announcement",

Brisbane

"Access to printed timetables - I have often requested train lines in another format but Vision Australia have said it is hard. You have to call the line and have to wait for a transport person and if calling from a mobile this can be expensive. It's 2013 not 1888. More information is becoming made available by technology which not everyone can afford", **Sydney**

"Access to information is an ongoing issue, like access to timetable information on bus stop poles, this could be automated and audible", **regional NSW**

"Usable accessible information at all levels of public transport. Accessible and inclusive public access areas that are safe to people who are blind or vision impaired. Braille bus stop numbers would be handy", **regional NSW**

"Accessible information like announcements and timetable information. Trains that breakdown during hot weather - it is hard to know what is happening and there is no assistance. It is hard to find the alternative transport", **Melbourne**

"Access to timetable / signs / apps that are accessible. Knowing the number of bus / tram / train when moving from one service to the next. I have safety issues, general safety whether at night or during the day. Safety Officers are based at bus/train stations, but not at bus stops and where are they at stations and how do I find them? Crowding is an issue on public transport and people's attitudes" **Melbourne**

"I'm generally happy with the public transport provisions in our area and find the timetable inquiry line particularly helpful. There is however the inconsistency of upcoming station announcements in our trains. The announcements seem to kick in arbitrarily or not at all on some train journeys. Is it possible to make it mandatory for this helpful announcement to be made before ALL stations on all train journeys?", **Victoria**

"Info, stops etc all still being visually based", **regional Victoria**

"Accessing accurate timetable info, clear and consistent audible announcements of stops and stations, no integrated way to access travel information across forms of transport such as bus, train and shuttle bus to determine the best way to travel particularly when travelling interstate", **regional Victoria**

"Inaccessible information on website, inaccessible information at bus stop poles or the information that is read to me by the public is out of date [are barriers]. I sometimes can't find anyone to read the next bus to arrive to me, whether that be from the bus pole or as a bus pulls up at the stop", **Tasmania**

"Independent access to timetables for metro transport [Adelaide] is still in PDF on the provider's website where it could so easily be done in easier to access documents. Even the VI [vision impaired] agency apparently does not store timetable information but takes an individual approach so that work needs re-

doing for each request which seems wasteful", **SA**

Poor connection between transport modes

"I reiterate the need for connections between different modes of transport".

ACT

"Getting from the train / bus station or stop to a taxi, the taxi might arrive at the other side of the rail-line, how do I know where the taxi is when there are multiple entrances? There is no one place to wait like a taxi rank at bus/train station. Other states have taxi ranks at one location like Perth's Kiss and Ride drop off zone, for cars dropping people off and where taxis wait for fares"

Melbourne

Business decision which impact on accessibility

"Trains skip stations where a service is running late. Metro Trains in Melbourne change the stops that the train is scheduled to stop at which means that a person can be forced to get off at an unfamiliar stop. It is their policy which has been confirmed by speaking to their call centre", **Melbourne**

"We have Smart Bus which has audible announcements and the ability to speed up or change traffic signals. The problem with these buses is that the announcement are hard to hear and can only be adjusted (volume) by the company that provides the system not the bus drivers or at the bus depot. The announcements are automated not controlled by the drivers", **Melbourne**

"Ironically, the [ticket] barriers are the barriers. A person with a free travel pass can't use the automated ticket system as you cannot scan the pass. It appears that there has been an increasing use of [ticket] barriers since the Standards have come in. The Standards do specify width of gates but there is nothing about alternative arrangements in the Standards" **ACT**

"Track works or incidents on the train network, it is difficult to use rail replacement buses and knowing where to find these alternative buses. There is also times when the buses don't connect with the trains or the other way around trains don't match up with buses", **Brisbane**

What do you currently see as the greatest areas of need regarding the accessibility of public transport for people with disability, particularly people who are blind or vision impaired?

Many of the same issues which have been explored extensively in this report were also viewed as requiring the greatest investment to rectify. This included equitable access to information, understanding of disability and the provision of direct assistance and clear protocols (with airlines and airports particularly a focus). The following issues were also raised in response to this question.

Accountability of operators and government jurisdictions to meet compliance

“VCOSS have noted in their submission that there is a lack of accountability by operators to report on their progress. Operators used to be required to report annually in Victoria however this appears to have dropped off in recent years. We should be asking for this to be reinstated and an auditing mechanism is needed”, **Geelong, Victoria**

“I have been carpeted by the station master and was told that if I want to use his station I will need to access it with a carer. Railcorp were fined. I would like to see a fine system – if a PA system isn’t working and the guard doesn’t do it, fine the guard. The use of complaints mechanisms is important. We need to use the systems in place and it does work”. **Sydney**

“I would like to see some recommendation that Council is required to assist private public transport operators who make their services more accessible to all community members ie people with disabilities and the aged”, **regional NSW**

Consistency between states and territories

“There is no national consistency of public transport, with or without these Standards. Each state has the Standards but using them differently”, **Melbourne**

“Every time there is a new model of conveyance there is a different configuration which means that people who are blind or vision impaired are not sure what they are going to encounter. Every state has their own standards of vehicles and their own specifications. It adds to the cost of the end result – if they have a larger population and buying practice, the approved model would be cheaper in the long run”, **Geelong, Victoria**

“Greatest need is standardised taxi voucher system along the lines of the m40 Victorian model. Allied with this is the prosecution of drivers refusing to carry dog guides”, **South Australia**

“Logical infrastructure that works. We need to move away from the taxi subsidy paper vouchers and raise the taxi subsidy cap. The bus, coach and taxi network need to roll out accessible vehicles”, **Tasmania**

Turning to technological solutions to help make travelling easier until the public transport system is fully compliant

“Common theme that is being raised is identifying what it is in front of you. The Standards should be specifying the usability of communications. For example, a signal which would advise whether the taxi is engaged which could be done using near field communication. Near field communication can be used at a low range, say 20 metres and only people who want to pick up that information can tune into it. We need to look at innovative solutions and applications that are accessible for all users”, **Melbourne**

"I don't use much public transport now that I am retired. I know there are taxi apps and train apps. And for people who use those apps, that's certainly quite helpful", **NSW**

"Using technological advances to make the system more accessible. The Government should spend more on technology to make the system accessible for people with disabilities. People with disabilities can't afford the technology to work-around the lack of transport technology, like having to buy a Smartphone to use apps (other than the Govt apps) to make using transport accessible", **Brisbane**

Are there any gaps that the Transport Standards should look to address? Also, are there any areas where more specific requirements in the Transport Standards would improve accessibility for people who are blind or vision impaired?

Strengthening enforceability of the Standards – a move away from a individual complaints based mechanism to enforceability mechanisms

"Taxi companies cover up incidents, they take the taxi driver side. The state based or AHRC systems are hard to use and don't seem to work", **Brisbane**

"What is the best way to complain and which system works better: the state system or the AHRC? There is lack of support from the transport providers if you lodge complaints. Making complaints only changes that driver or staff member for that time, it doesn't change the rest of the staff", **Brisbane**

"Why don't penalties work or why are they not being used against transport providers who are not doing the right thing. Who would enforce non compliance?", **Brisbane**

"I am not aware of the process although I did follow the Victorian case - Ms Kelly taking the operator to court", **QLD**

"I have not utilised these complaint mechanisms admittedly, but when the failure to meet these disability standards has been so complete, should anybody really have to be subjected to this process? I'm talking specifically about regional areas here. Unless I hear some great revelation that things have changed since 2004 when I last attempted to catch a bus independently to work (and I have travelled on buses with other people since that time), I'm not about to attempt to try it again. It's not worth my sanity! Maybe I have been lucky in that I have been able to afford an alternative, but these complaint processes surely aren't designed to address a complete failure of public transport providers to meet access standards! Surely they are designed to address specific issues! I mean where would I begin, if I had the time and energy to invest in it!?", **regional Queensland**

"Do regional and remote areas think that they are not subject to these standards? Is there some loophole that allows these areas to ignore their

responsibilities? I say in literal terms, thank God for the taxi service here, because otherwise I'd be frightened to leave my own home! I am truly sorry to have to report such a state of affairs!", **regional Queensland**

"The process is accessible but in order to get access to justice you have to go to the Federal Magistrates court which is a cost providers can easily absorb. Providers know that that a person with disability can't hurt them. Over the years I have come to realise that there needs to be penalties provided, similar to the Trade Practices Act. Information provision is one area where while there has been some improvements, there is no universality", **ACT**

"Sheila King lodged a complaint however her complaint was thrown out through lack of merit. The Australian Human Rights Commission needs to be given more teeth. How many of us could afford to take a complaint to court? Enforcement needs to say that the provider must conciliate", **ACT**

"Graeme Innes recent case against Railcorp has a decision which stated that a breach of the Standards did not automatically constitute indirect discrimination. This is very concerning and there is a need to amend the wording of the Standards to state that a legislative breach of standard is actionable discrimination", **ACT**

"If more people who are blind or vision impaired or people with disabilities made complaints then the system would work, the companies and government would take notice. Complaint forms are inaccessible if you are not a web user or if you are then the website is inaccessible. There are no enforcements or penalties. The DSAPT Reviews happen too slowly at the Government end, not the users end and there doesn't seem to be results from consultations, nothing changes and there are more exemptions than results", **Sydney**

"The AHRC expect that you have gone through the complaints process with the company before contacting the AHRC. Some people don't want to let the company know they wish to lodge a complaint. The Transport Standards are complicated and smaller transport providers don't understand them", **Sydney**

"The Transport Standards enables individuals with a disability to make an individual complaint of disability discrimination. Are the current processes for making a complaint or seeking information sufficient? When we talk about people complaining and compliance to the DDA, we have found that people have generally given up on the public transport network. Julia Harrison who complained about lack of wheelchair access to coach companies. Graeme Innes case went to the Federal court however the provider still has not done anything about it. People are going to stop lodging complaints even if it goes to Federal Court because no outcomes are found", **regional NSW**

"Complaints are easy to lodge but there is no follow up or it takes too long and the system wears the person with a disability out. People lodge complaints but give up before the end of the process. The complaints system is counter-productive. It is really wishful thinking. Companies and government providers don't comply", **regional NSW**

"The Australian Human Rights Commission (federal system) is teeth-less, no action is taken, complaints are dragged out until the system runs out of time or the person gives up. There are no penalties for not complying", **Melbourne**

"The web-based complaints systems are inaccessible. Complaints take too long to be resolved or even dealt with", **Melbourne**

"How do people find out what support is available to them if they make a DDA claim?", **regional Victoria**

"The complaints system doesn't change what happens. People with disabilities and people who are blind or vision impaired don't use the system because it doesn't seem to work", **Tasmania**

"Complaining to the taxi company doesn't resolve the issues. The taxi company complaints/feedback page isn't accessible. Should we make a complaint to Equal Opportunity Commission (state based) or Australian Human Rights Commission (federal system)? When I lodge a complaint, the information they send me is paper based not electronic so it's inaccessible", **Perth**

The Standards to better reference disability training

"I think one of the greatest problems is identification. Even when I carry a white cane, I can't believe the number of people who do not know what that means. Surely there must be some way of identifying someone with a vision impairment - a universal way".

"Transport providers should be given one document about providing transport to people who are blind or vision impaired or people with disabilities that explained all the other Acts and Regulations, like the Dog Act, the Guide Dog Act, Business regulations, Transport standards, the DDA etc", **Brisbane**

"I find public transport in Sydney much improved and employees are most helpful, especially on trains and buses. However, Burwood rail station leaves much to be desired. The staff on the platforms are very helpful and a few weeks took me down to the street level and let me through the unticketed exit. The puerile comments coming from employees nearby were loud and unacceptable", **Sydney**

"When using the country Sydney train station, it is hard to get any assistance and where do I find someone to assist me. I have been told, all I have to do is raise my hand or wait at a certain place and someone will come, but how long will it take for them to see me and what if they don't come to my assistance, where do I have to wait? People who have had difficulties using the transport network no longer travel or go out as it's just too hard. The frequency of bus/train services means that people sometimes can't go out or have to leave early or wait long times to get the available transport", **Sydney**

"When visiting Sydney the staff's lack of awareness of the needs of people

with disabilities or knowledge of other public transport services. The lack of awareness by the public is also an issue. Staff or public who point to a direction when giving instructions, or assume you know which street or area they are talking about. People who are blind or vision impaired give wonderful meaningful directions and instructions to the public. Sometimes when visiting Sydney I just don't know where I am so ringing someone for assistance without knowing where I am is unhelpful", **regional NSW**

"Understanding and awareness of staff and the public to what people with disabilities need. Staff attitudes are a problem, some staff are rude to insulting while other staff are helpful. Why don't they train all the staff? People with disabilities don't ring up to make positive feedback, so staff only hear bad stuff from us", **regional NSW**

"A friend flew Virgin from Sydney to Melbourne and back to Sydney, the first flight was fine and the Virgin staff were great but the flight back the Virgin staff didn't even show the person with disabilities to their seat or give them any assistance other than what non-disabled passengers were receiving. The friend then had trouble finding any contact number to complain to Virgin about the incident as this was not easily accessible from the website. When they did contact Virgin they were quite helpful and even gave the person a \$100 flight voucher for another flight, and they gathered the crew from that flight together and gave them disability awareness re-training and let my friend know after the re-training. Whilst this was good and the voucher was nice, it didn't change the fact that the incident occurred", **regional NSW**

"There should be more staff awareness and training to prevent issues. The earlier example about Virgin Airlines didn't lead to systemic change. They handed out a voucher before dealing with the lack of staff awareness. The lack of access to complaints information from their website is a disincentive to people making complaints with or without disabilities", **regional NSW**

"It is in trying to get through the entrance that I have the problem. There is never anyone there to open. I travel all over the city and beyond and never have a problem. I waste so much time and miss buses to Vision Australia at Enfield. On 22nd Feb, I even had the staff phone Burwood. When I got off the train the staff told me the lower exit was manned and the manager was there. There were tech students in great numbers moving through the exits but there was no staff at the disability exit though I had walked up to the restrictors many times. Then a young lady stood in front of me and the red panels moved and I squeezed out quickly. As I escaped I saw a forearm come down to the floor just near my right foot. It was in a long white sleeved shirt with cuff. Could see no more but this could have been the manager. No sounds. No speaking. Was this the manager? Things are still the same. This time last year I actually phoned the department and did speak to the new manager who promised the necessary changes. Nothing has changed", **Burwood, NSW**

"Staff awareness of the needs of people with disabilities and people who are blind or vision impaired has not improved. Or some staff are helpful and other

staff are not", **Melbourne**

"It was stupid, we were on a train today with my seeing eye dog and my wife and nobody at all offered us a seat. I didn't see a conductor so me and my wife had to stand up all the way", **regional Victoria**

"Over the last 6 months, we have three different contractors taking over the bus routes. Drivers don't seem to have any disability awareness training or the training that has been provided has been forgotten", **Adelaide**

Improving the availability of, and access to, public transport services

"If you have multiple disabilities, like being blind and also with mobility issues where sometimes you need to use a wheelchair, it is very difficult to access public transport. In my regional area there are only buses and taxis which work OK because I am aware of their limitations, but when visiting Sydney where I expect more accessible services I often don't find them. In Sydney there is very little assistance to people with disabilities", **regional NSW**

"The issues are that there is no transport in Cootamundra. My issue is always a lack of public transport - to bring back trains and bring back public transport. [There is] irregular transport or no transport. People have to catch lifts with one another. We are a transport hub but we're on the main Melbourne city rail line. The timing is pretty ordinary. Once you are outside NSW city, there is no transport. When I go to Sydney, I find that the variation in platform heights, there is a gap. Quite dangerous" **regional NSW**

"The bus service is absolutely woeful in the retirement village area to St Ives. There have been letters to the mayor and to council but there has not been a single reply. I have lived in the area for 56 years and there has never been a bus service between St Ives and Turrumara', **regional NSW**.

"I have the perfect transport system called wife and car. On Sundays, there are no buses. There are only 6-7 buses going to Bundaberg", **Bundaberg, Qld**

"I have not booked a place on the telephone meetings due to not using public transport. I would use it if available but in our small rural town with a population of approx 3000 we have no public transport. The nearest rail station is in the next small town but has no connecting service. I travel on Queensland long distance rail once a year and the service from onboard and station staff is very good. I have not used Queensland suburban train service for several years and am reluctant to do so independently due to the poor quality of onboard announcements. The Queensland air train from the airport to Gold Coast is privately owned but their onboard and platform staff provide an excellent support service and do accept the Companion Card. Queensland Rail has increased charges and limited availability of "fee" seats on long distance train services which is causing some concern to regular travellers", **regional Queensland**

"There is very little public transport, mostly buses and coaches and taxis, and

the ferry. There are slightly more buses on the network, although if outside the metro area, there are reduced services and these services are often not accessible to people with disabilities. They claim you can call and ask for a low floor bus, and people do, but when the bus is due to arrive it isn't an accessible bus, so you can't even rely on this even if you do call in advance", **Tasmania**

Universal design of transport

"If I was given a smartphone as an older person with disabilities to make public transport more accessible, it would be as a work-around to an inaccessible system. I would give the smartphone a try and I might even like it, but this sort of technology doesn't interest me and I might forget the best way to use it. Public transport should be universally designed so that it is accessible", **Sydney**

"Why don't buses have audible announcements when they pull-up at bus stops when the door opens, this technology probably exists. The bus should give me the bus number and the bus stop should give me the bus stop number, if this information is available to people who can see, I should be able to access that information in an alternative way, other than the bus driver opening the door and yelling out to me. When I ring to get information about using the public transport in Sydney, the person on the end of the phone doesn't know which area I mean or I don't know enough to tell them where I need to go to", **regional NSW**

"I live in the country and have no problem at present there. However, we travel to Sydney frequently for medical treatment and need to access train travel while there. We are having more trouble with getting on and off trains as the carriages seem to be getting higher and also further our from the platform. This makes me feel very insecure as I am losing my perspective and find it increasingly difficult judging these distances especially after my eye treatment for macular degeneration", **regional NSW**

"In general I think that access to transport has improved in the last 5 years but I think it's been driven largely by complaints (including Graeme Innes' complaint) rather than ongoing improvement toward meeting standards eg. since Graeme's complaint City Rail staff have definitely been more helpful and considerate and announcements have improved. There is however one very basic area in which I believe there should have been improvement and there has been none in my observation. The quite varying gaps between train and platform. As a severely sight impaired (but not totally blind) person who sometimes uses a cane, I have found this to be particularly dangerous and have hurt myself a couple of times by tripping or falling through this gap. Flat access onto trains with a minimal gap would make access to trains much easier and quicker for me and other blind/vision impaired people; also make access possible and independent for wheelchair users and make boarding and alighting trains much quicker for the general public thus make the train system more efficient generally.

The problem is even worse for country/long-distance trains which (for some bizarre reason) have steps and a quite wide gap. This is my experience in NSW and Melbourne. I have seen examples of trains with only a few cm gap between train and platform. I know it would take years to work toward this. We need to have started by now. Let's start soon". **NSW**

"Logical infrastructure that works. We need to move away from the taxi subsidy paper vouchers and raise the Taxi Subsidy cap. The bus, coach and taxi network need to roll out accessible vehicles", **Tasmania**

Redressing some of the gaps in the Standards

"I think we need more specifics to be put into the Standards regarding information and wayfinding access. There are general principles that we should have access to information, but all it says is that we should have Braille. There are no specific requirements of where tactile signage should be provided. Information to me is the biggest issue. Until we have some specifics, it is not sufficient", **NSW**

"I have the right to travel safely, knowing where I am and where I want to go and when I want to travel. It's been a long time since the DSAPT were introduced with very little advancements even with advances in technology", **Melbourne**

"A question, why are planes with less than 30 seats exempt? Some short commercial air routes such as Brisbane to Toowoomba use small planes", **regional Victoria**

Other gaps identified in the Standards

- Operators that operate services nationally should have standardised requirements between jurisdictions.
- The 5 year review of the Standards is a gap. They have engineered this system of review which by its very design will fail to meet our needs as you have to wait five years to see whether anything has improved.
- Service interruptions and arrangements for these interruptions – while these are unplanned they regular occur however service interruptions are not referenced in the Standards and disability access considerations appear to be adhoc.
- New and emerging technologies – planning a trip, apps, website and keeping pace with things. These need to be accessible.
- The lack of emergency access assistance for public transport users with disability.

Additional recommendations

In addition to the issues and recommendations highlighted throughout this report to redress the barriers experience by people who are blind or vision impaired,

improve public transport and address gaps in the Standards, Blind Citizens Australia would also like to draw specific attention to the following:

1. Greater clarity of the requirements of section 27.4 of the Standards which relates to the information available to passengers while on a transport journey. Legislation established in Ontario, Canada, provides clear guidance on requirements relating to onboard announcements and information in other than visual forms, as well as a reasonable timeframe for operators to comply. An excerpt of the Ontario Regulation 191/11, made under the *Accessibility for Ontarians with Disabilities Act 2005* has been provided below for the reference of the Committee.

“On-board announcements

52. (1) Every conventional transportation service provider shall ensure that there are audible verbal announcements of all destination points or available route stops on its transportation vehicles while the vehicle is on route or while the vehicle is being operated.

(2) Every conventional transportation service provider shall ensure that all destination points or available route stops,

(a) are announced through electronic means; and

(b) are legibly and visually displayed through electronic means.

(3) For the purposes of clause (2) (b), visual displays of destination points or stop information shall satisfy the requirements set out in section 58.

(4) This section applies in respect of the following:

1. Transit buses.
2. Motor coaches.
3. Streetcars.
4. Subways.
5. Light rail.
6. Commuter rail.
7. Inter-city rail.

(5) Conventional transportation service providers shall meet the requirements of subsection (1) by July 1, 2011 and the requirements of subsections (2) and (3) by January 1, 2017.”

2. Reference in the Standards to the Australia wide introduction of ‘talking’ taxi meters. The ability to independently verify a taxi fare remains an issue across Australia, placing people with a print disability in a less equitable position to other passengers and at risk of fraud.

In May 2013, the Victorian Government released their response to the Victorian Taxi Inquiry conducted by Professor Allan Fels AO. One of the recommendations which has since been adopted is the requirement that all Victorian taxis will be fitted with a ‘talking’ taxi meter which will announce the metered fare and any

additional fees and surcharges. Blind Citizens Australia recommends that a requirement to provide an audible equivalent to the visual meter display is included as a clause of the Transport Standards, with consideration also to the needs of people who are deafblind.

3. A legislative breach of the Standards must be viewed as actionable discrimination. This report extensively outlines the view of the community of the need for more enforceable disability transport standards. Blind Citizens Australia recommends that compliance is not only enforced through the development of an independent mechanism (or in turn by extending the powers of Australian Human Rights Commission to investigate systemic barriers experienced by people with disability when using public transport) but that non compliance is viewed as a legal breach and as actionable discrimination in legal proceedings.

4. The Standards needs to develop in accordance with advances in technology and other influences. The development of bus interchanges, hybrid vehicles used in taxi fleets which omit very little sound (thereby posing a potential risk to people who are blind or with hearing impairments) mobile phone apps, 'talking' taxi meters and other developments do not neatly fit into Standards developed ten years ago. Likewise the Transport Standards also need to reference developments in other standards and law, such as the Access to Premises standard and the National Disability Strategy.

Closing

While access to public transport has improved in a number of ways, poor access to information, inconsistent disability awareness, barriers which impact independent bus, taxi and airline use as well as the enforceability of the Standards continue to impede the accessibility of public transport that people with disability should have in 2013.

Blind Citizens Australia recommends that the above report is considered in detail to ensure that jurisdictions can better map and prepare for the 2017 and 2022 compliance targets with the needs of people who are blind or vision impaired in mind. In turn, we also recommend that the Federal government use this review to consider amendments to the Transport Standards to ensure that the Standards meet their intention – to provide equitable access to transport to people with disability to enable them to be able to take part in everyday life.