

Disability Standard for Accessible Public Transport **Review Response**

This review response is presented on behalf of the Interagency Access Forum (Vision Impairment).

The Interagency Access Forum (IAF) was formed in late 2004 and is a representative committee that is dedicated to promoting the rights and needs of people who are blind and vision impaired, and their access to the built environment including pedestrian safety and public transport.

Members are drawn from the major service providers and consumer advocacy groups in the Greater Sydney Metropolitan region. Membership is composed of representatives from Association of Blind Citizens of NSW, Blind Citizens Australia, DeafBlind Association, Guide Dogs NSW/ACT, Retina Australia and Vision Australia.

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Submitted electronically

Thank you for the opportunity to comment on the draft of the Review of the Disability Standard for Accessible Public Transport.

Whilst many key issues have been raised throughout the Review, there are a number of critical issues of importance to people with vision impairment that have not been addressed by the final recommendations.

These include:

- ☐ Access Path – clarification of definition
- ☐ Provision of Accessible Information
- ☐ Referencing up to date Australian Standards
- ☐ Use of Tactile Ground Surface Indicators in conveyances
- ☐ Staff training

The following addresses Questions 1 and 2 from the Review report.

Error Correction required

There is a mistake within the Transport Standard Review and it would be beneficial if this was amended.

Table 12.1 on page 158 of the printed report currently reads:

Parts	Technical issues	Recommended amendment
Part 2.1	Access paths	Amend description of an access path from clearly defined to ‘unhindered’

In line with other recommendations and sections, this should read:

Parts	Technical issues	Recommended amendment
Part 2.1	Access paths	Amend description of an access path from ‘unhindered’ to clearly defined

Access path - clarification

As a further recommendation to reduce any confusion (as has been mentioned within the Transport Standard Review) it is recommended that this statement be edited to state:

Parts	Technical issues	Recommended amendment
Part 2.1	Access paths	Amend description of an access path from 'unhindered' to 'unhindered and clearly defined'

This will provide all parties with a understandable definition of the nature of an Access Path for all people with disabilities.

Access Path- Recommendation

Develop an expanded and functional definition of a clearly defined / identifiable access path, remembering that a person who is vision impaired is unable to see to use the usual visual signs that delineate an access path, a clearly defined access path would include the following features:

- ☐ Have tactile borders that enable a person with vision impairment to make their way independently, safe and with dignity between the entrance / exit point and the conveyance.
- ☐ Be without hazards such as pedestal, head height obstacles, poles etc
- ☐ Be unhindered by obstructions such as ticket queue barricades, people waiting in queues, merchandising, ticket machines, seats, telephones, jutting pieces of the building.
- ☐ Be logically and consistently placed

(For people with vision impairment, this is as much of a need as a ramp to avoid steps is for people with mobility impairment.)

Provision of Information

All previous sections of the Disability Transport Standard prior to Part 27 (Information) reference a variety of Australian Standards. Part 27 (Information) is one of the few that is not referenced and is one of the most contentious parts of the Transport Standard.

Whilst there are comments throughout the Transport Standard Review that highlight the importance of the provision of information to people who are vision impaired, this is ignored in the final recommendations. (See Appendix A for more detail.)

Provision of information is a key factor for 'whole of journey' accessibility for people who are vision impaired. This applies to timetable information, signage, information about location and much more. There appears to be no clear definition about the extent of accessible information that is to be provided, other than providing accessible timetable information or other printed information.

Question 2 of the Transport Standards review asks "*Are there options to address these problems that the review has not considered? If so, please provide details on these options and your assessment of their costs and benefits (including supporting evidence)*". The answer to the provision of on-board information to people who are vision impaired is simple and easy; the bus driver / train operator / ferry operator / tram operator need only make an announcement about the approaching stop. Many modes of transport have existing public address systems. In the case of buses, the bus operator / driver at the very least can state clearly "We are now approaching (insert suburb or shopping district)".

The cost - \$0! The benefit - priceless!

Provision of Information- Recommendation

1. Transport Providers to ensure "equivalent access" to information,
2. Provide a more precise definition of "General Information" that is to be provided in the Transport Standard Part 27.1 which states "General Information about transport services that **must be accessible** to **all** passengers"
3. That Section 27 of the Standards be expanded to include performance based measures, which would need to be met before 100% compliance can be claimed.

We appreciate that the purpose of this review is not to change the intent of the Standards, but to evaluate their effectiveness. In recommending the above, we are only seeking to clarify what we believe is already the intent.

Since the review is to assess the effectiveness of the current Standards, we have attempted to estimate current compliance against the information performance measures that we have identified; it is believed that these figures are quite generous to some providers. It should be noted that 100% compliance was to have been reached by 31 December 2007.

- ☐ Timetable information (60%)
- ☐ Destination and route details of next conveyance (40%)
- ☐ Destination and route details of current conveyance about to be boarded (40%)
- ☐ Next stop information when on conveyance (40%)
- ☐ Independent verification of amount of fare when in a taxi (0%)
- ☐ Details of buses using a particular bus stop (10%)
- ☐ Details of the "stand number" of the particular bus stop where there are more than one in a single location, i.e. bus interchanges (10%).
(See Appendix B for pictorial example of this issue.)
- ☐ Ability to identify, hail / stop and board a specific bus when multiple buses use one stop at the same time.(2%)
(See Appendix B for pictorial example of this issue.)

Referencing Australian Standards

Within the Transport Standard Review report, the issue of referencing Australian Standards is raised and in part is addressed by Draft Recommendation 1 through the mechanism of having a technical expert group. However there are a number of issues of concern with the composition of this group; will there be an expert who will know the needs of people who are blind or vision impaired?

As the Transport Standard has been amended three times since it's publication, when there are amendments, this should include reference to the up-dated and current Australian Standards. This will allow for technical specificity which will meet the current accessibility needs of the community as it changes and will match with Australian Standards.

The cost – minimal

The benefit – meeting current community needs for accessibility

Provision of the actual Australian Standard information educates consumers and allows for a more accurate interpretation of the Transport Standards.

It should also be noted that where there are references to Australian Standards, meeting these requirements should be seen as a minimum and does not necessarily match best practice.

Referencing Australian Standards – Recommendations

Experts in disability fields be included in the Technical Expert Group

At each amendment of the Disability Transport Standard, the references for Australian Standards be up dated to reference the most current versions

Tactile Ground Surface Indicators (TGSIs)

It is recommended that the use of TGSIs be researched thoroughly to ascertain the mode specific needs and possible alternate formats of TGSIs than what currently exists in AS1428.4, particularly as they would require greater slip resistance for use in a moving conveyance.

Again like the provision of information, to assist all providers and constructors of public transport infrastructure and conveyances, a performance-based requirement may alleviate the inconsistent installation of TGSIs as is mentioned within the Transport Standard Review as this would allow a more functional outcome.

TGSIs - Recommendations

That the use of TGSIs be researched thoroughly to ascertain the mode specific needs and possible alternate formats of TGSIs than what currently exists in AS1428.4, particularly as they would require greater slip resistance for use in a moving conveyance.

That the use of TGSIs as it pertains to moving conveyances be researched thoroughly to ascertain the mode specific needs. If it is demonstrated that TGSIs as currently contained in AS1428.4 are likely to present a hazard in a moving conveyance, then appropriate mode specific and consistent standards which meet the intent of the Disability Transport Standard and AS1428.4 should be developed.

Staff Training

Whilst the impact of a lack of training is mentioned in the Transport Standard Review, there is no recommendation about this vital issue. Again like the provision of information, the provision of suitable and timely customer service by Public Transport provider staff is a key service provision for all public transport users. Whilst this may in part not be an issue for some providers who do include disability awareness training for their new staff, there are also many who do not.

Staff Training - Recommendation

Development of a performance based measure that outlines the requirements for all staff associated directly and indirectly should be included.

Appendix A

Within the Transport Standard Part 27 and its related Guidelines cover the provision of information in accessible formats. This is greater than just the provision of timetable information. There are other types of information required to participate in a public transport journey. The following sections of the Transport Standard and Transport Standard Guidelines appear to indicate that the provision of a variety of information is a necessary part of an accessible public transport journey.

- (a) Part 27.1 (General information about transport services must be accessible to all passengers),
- (b) Part 27.4 (All passengers must be given the same level of access to information on their whereabouts during a public transport journey. - conveyances) and
- (c) Guidelines Part 27.1 (The Disability Standards provide that operators or providers will supply all passengers with information necessary to use a transport service.),
- (d) Guidelines Part 1.18 Explaining and understanding networks
 - (1) Non-discriminatory access to public transport may require some adjustments by operators and providers to existing methods of service delivery.
 - (2) Operators have an obligation to ensure that information about their service is presented in a way that passengers can understand. However, operators may also choose to give assistance to individuals.
 - (3) The Disability Standards assume that passengers:
 - (a) can understand information given in spoken, written, tactile or diagrammatic form; and
 - (b) have the capacity to use a mass transit system; and
 - (c) are competent to select their destinations, modes and times of travel; and
 - (d) can communicate their destinations where necessary.
- (e) Guidelines Part 27.2 (5) Operators could choose to announce scheduled stops as one way of informing passengers of their whereabouts during a journey.

Information required by a person who is vision impaired to participate in a public transport journey includes but is not limited to:

- ☐ Timetable information
- ☐ Destination and route details of next conveyance
- ☐ Destination and route details of current conveyance about to be boarded

- ☐ Next stop information when on conveyance.
- ☐ Independent verification of amount of fare when in a taxi
- ☐ Details of buses using a particular bus stop
- ☐ Details of the “number” of the actual bus stop where there are more than one in a single location.
- ☐ Ability to know specific bus when multiple buses use one stop at the same time.

A person who is sighted is able to visually see signage and landmarks that allow them to know their location. A person who is sighted is able to then know where they are. This is not a “service” provided by the transport provider but is an integral part of participating in a transport journey. A person who is vision impaired does not have access to this type of information

Also a person who is vision impaired may be quite safe in travelling locally and beyond. They have contacted the provider for details about bus, train and other mode times, route number, route details and stop locations. Under the Guidelines for the Transport Standard they, therefore, have met their obligation. Yet, for example, without the provision of information about location, whether it is on a bus, train or other mode of transport, the person is travelling without knowing where they are and this is neither safe nor dignified. If they miss their stop, how do they safely find their way back?

What price for vision?

Appendix B – Pictorial Examples



[This example shows the Carrington Street bus interchange at Wynyard Station, Sydney, where there are multiple buses using the different stops that are not identifiable other than through print signs.]



[These examples show a bus stop in George Street Sydney that has 21 buses using the one bus stop.]