

Response to the Issues Paper

# Review of the Disability Standards for Accessible Public Transport

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#### Introduction

The Victorian Council of Social Service (VCOSS) has served Victorians as the peak independent coordinating body of the social and community services sector for over 60 years. VCOSS raises awareness of the existence, causes and effects of poverty and inequality and advocates for the development of a sustainable, fair and equitable society. As well as promoting the wellbeing of those experiencing disadvantage and contributing to initiatives seeking to create a more just society, VCOSS also provides a strong, non-political voice for the community sector.

VCOSS works together with its members on issues of poverty and inequality and seeks to ensure that community resources and services are accessible and affordable. VCOSS promotes community participation and strengthening the value of citizenship in our community. VCOSS advocates on behalf of disadvantaged Victorians through:

- · policy development and analysis;
- direct advocacy to government;
- evidence based research;
- · reports, media releases and submissions;
- an annual State budget submission; and
- strengthening the community sector with collaborative initiatives and by providing a range of services to member organisations.

This submission has been developed with the Disability Resources Centre (DRC), VCOSS and Disability Advice and Information Service (DAIS) Accessible Transport Watch Project and the VCOSS Transport Action Victoria Network.

The Accessible Transport Watch Project is actively monitoring people with disabilities experience of the accessibility of public transport in Victoria. Although this project will not produce a final report until September, some early feedback from participants is included here.

Also included are some comments from members of the Transport Action Victoria Network, a network of people across the state who experience transport disadvantage and community-based transport advocates.

Lastly our submission includes a report from a consultation held on the 14 July in partnership with the Australian Federation of Disability Organisations (AFDO).

In addition to the comments presented here, VCOSS strongly endorses the recommendations made by AFDO, and for brevity has not repeated these same points.

# **Summary of recommendations**

- 1. That the Standards strengthen the provisions for vehicle boarding to ensure that:
  - a. vehicle boarding is safe and accessible for ambulant but mobility impaired passengers, and
  - b. mechanisms for entry and exit of trains are developed that do not rely on manual operation of ramps.
- 2. That the Standards increase the number of reserved seats to be identified on vehicles to reflect the increased numbers of people with disabilities using public transport.
- 3. That the Standards include provisions to monitor use of infrastructure and vehicle improvements, not only capacity for accessibility.
- 4. That the Standards require clear information be provided on platforms to indicate where passengers needing assistance should board.
- 5. That the Standards mandate the provision of easily understandable information about which services and infrastructure are accessible on all timetables.
- 6. That the Standards mandate that all timetables be provided in larger font sizes and simpler formats.
- 7. That the Standards impose a stronger compliance regime.
- 8. That the Standards limit the walking distance required within stations to 100 metres.
- That the Standards require that disabled parks be located where people can safely exit vehicles and easily access services, from community buses as well as from standard vehicles.
- 10. That the Standards require that reporting on compliance be provided site by site, as well as in aggregate.
- 11. That the Standards develop a specific requirement for scanning devices similar to the Australian Standard for gateways and checkouts.
- 12. That the permanent exemption for school buses be removed.
- 13. That a timetable of minimum standards for accessibility in geographic areas be included in the Standards in addition to the general timetable.
- 14. That the Standards reduce the period to achieve full compliance to 2022, instead of 2032.
- 15. That the Standards ensure the provision of accessible luggage storage.

# Impact of the standards

The accessibility of public transport has improved significantly since the introduction of the Disability Standards for Accessible Public Transport (the Standards).

In Victoria, the Standards were instrumental in a Government commitment of \$25 million over ten years in the 2007/08 State Budget for DDA accessibility of public transport. Previous budget commitments for accessibility would also not have occurred without the Standards.

These budget commitments have enabled investment in accessibility improvements, including accessible tram stops, new vehicles, tactile paving, and bus stop redesigns.

#### **Vehicles**

Most metropolitan trains, more than 50 per cent of metropolitan buses and a small proportion of trams have been upgraded to provide most aspects of accessibility. This has improved access to these services for a large number of travellers.

However, in many cases the usability of accessible transport is compromised for people with disabilities because of poor implementation of the Standards or misuse of infrastructure or vehicle improvements.

The lack of ramps that are suitable for use by such ambulant, but mobility impaired transport users, is one example of poor implementation that compromises accessibility for some users.

An Accessible Transport Watch participant using V-Line service demonstrates one example of where misuse of vehicle features compromises people's ability to enjoy a journey of equivalent accessibility. This passenger is a wheelchair user and was assisted onto a train into an area with no nearby accessible seating with their carer.

"We were lead into the train and placed just inside the doors and when we asked were we to travel there, we were told, yes. I stood next to Wendy. Wendy was in her wheelchair. We travelled in that part of the train for the whole journey.

"We felt like aliens and were in view of everyone, making it very obvious that we didn't fit into the transport using community. Very rocky as we were right on the join of the carriages."

The system of having the driver assist people using wheelchairs to board and get off the train causes multiple problems.

One passenger noted that "on this trip the driver remembered to help me, but sometimes I bang on the door, but he's forgotten." Clearly getting off the wrong station would present significant problems for many passengers.

# **Recommendation:**

- 1. That the Standards strengthen the provisions for vehicle boarding to ensure that:
  - a. vehicle boarding is safe and accessible for ambulant but mobility impaired passengers, and
  - b. mechanisms for entry and exit of trains are developed that do not rely on manual operation of ramps.

Other passengers report on the difficulty of accessing the seats reserved for people with disabilities during peak times of travel. Commonly not enough seats or wheelchair parking areas are available for all the people with disabilities, frail older people and people with prams or pregnant women who are travelling at that time. Overcrowding on vehicles also makes boarding near to impossible for people in wheelchairs.

#### Recommendation:

2. That the Standards increase the number of reserved seats to be identified on vehicles to reflect the increased numbers of people with disabilities using public transport.

Accessibility is often also compromised by a mismatch between the accessibility of a vehicle and the accessibility of the tram or bus stop or train station. For example, low floor trams cannot be used by wheelchair users, unless boarding and exiting at a platform stop – and less than 4 per cent of all Melbourne tram stops are platform stops.

Conversely, low floor vehicles have enhanced usability of public transport by far more transport users than those with a disability. Parents with small children and/ or prams, and shoppers with trolleys or heavy bags all benefit from low floor vehicles, with or without an accessible stop. These vehicles are also safer and quicker to board or leave for all passengers.

Another issue raised by several transport users with vision impairments was the difficulty of locating the button to open X'Trapolis trains.

"It's difficult for me to find the button or handle to open the door, but the button system is more difficult for an unsighted person. Suggestion – improve the accessibility of the button by making it easier to locate.

The same passenger also suggested:

"I wish we had the Sydney system of the driver pressing a button with all doors on the platform side opening at every stop automatically. This would solve the button issue."

#### Information

Information provision provides another example where available equipment is not being properly used.

Many vehicles now contain the technology to provide information in multiple formats, however, often it is turned off, or the equipment settings are incorrect and misinformation is provided. For example, the visual announcements of upcoming stops on trains are often incorrect. Tram drivers rarely announce upcoming stops, despite having built in audio systems. Often information at large train stations about which platform to use are confusing – and don't indicate which end of a platform passengers using a wheelchair need to board at. As station platforms are long and can be crowded, this commonly results in a passenger missing their train.

Accessible Transport Watch participants with vision impairments noted how helpful audible announcements are when they are made. One participant noted that:

"It is very difficult when stations are not announced, or not announced correctly, as I cannot read the station names on the platform. In familiar locations I have other landmarks, although travelling after dark is very difficult."

#### Recommendation:

- 3. That the Standards include provisions to monitor use of infrastructure and vehicle improvements, not only capacity for accessibility.
- 4. That the Standards require clear information be provided on platforms to indicate where passengers needing assistance should board.

A major problem with the bus network has been the refusal of bus companies to indicate on timetables when accessible buses are scheduled. Although a few companies provide this information if it is requested by phone, this involves extra cost and less convenience than providing the information on the timetable to all passengers. It is also not useful for spontaneous travel.

Some information about the accessibility of infrastructure and vehicles is now provided on the Metlink and VicLink websites, however participants in the Accessible Transport Watch project found this information very difficult to access, and those that did get to the right part of the website reported that they were not able to understand the information provided.

A particular problem identified on the train network is the failure of train drivers to announce when a train will be arriving at a different platform to the usual arrival platform. One passenger with a vision impairment reported that he attempted to leave the train on the wrong side and stepped out onto the train tracks - clearly at great danger to himself.

A number of Accessible Transport Watch participants also noted that timetable information at stations and stops in presented in confusing formats and in text that is too small too read. For more information about difficulties with information refer to the consultation report attached.

#### Recommendation:

- That the Standards mandate the provision of easily understandable information about which services and infrastructure are accessible on all timetables.
- 6. That the Standards mandate that all timetables be provided in larger font sizes and simpler formats.

#### Infrastructure

The Standards have led to some important improvements in the accessibility of infrastructure, including reductions in the ramp gradient at many stations, the building of lifts at train stations, bus stops redesigns and upgrades and the construction of some platform tram stops. This has delivered improved accessibility to passengers using upgraded infrastructure.

The importance of reducing ramp gradients is highlighted in the comments from an Accessible Transport Watch participant:

"The ramp from the street to the station is so extreme that's all I can say, it's terrible. But having underground access to the other side of the station is much safer than the road, however, having two down ramps and one up ramp takes its toll on the disabled. They are tiring, hurt my leg.

In general infrastructure improvements have been slower than vehicle improvements.

In Melbourne, this is a particular problem with the tram network. Despite the Standards coming in 2002, progress on building platform stops only begun around 2004, with no significant numbers of stops built until this year. It is our view that lack of progress on tram stops has been due to Government inertia – made possible by a lack of clear enforcement and compliance measures in the Standards.

#### Recommendation:

# 7. That the Standards impose a stronger compliance regime.

As trams provide essential access to services, shops and employment throughout the central and middle suburbs of Melbourne, improved access to this mode will deliver great benefit to people with disabilities.

Platform stops also generally enhance pedestrian amenity as they provide a traffic calming effect, provide greater safety, more room and improved protection from weather for all transport users. This broader impact is consistent with the Victorian Government's planning framework for Melbourne, *Melbourne 2030*.

However, the experience of an Accessible Transport Watch participant with complete blindness highlights that the existence of an accessible platform does not always achieve accessible access to a vehicle. This passenger attempted to board the wrong V-line train at a platform because there were no staff available to assist him, and more than one train was parked along the platform. He was prevented from leaving on the wrong train by the intervention of another passenger. The passenger also noted that he fears walking off the edge of the platform without staff to guide him to his train.

In addition to being confusing, the practice of having more than one train along a V-Line platform also creates very long walks of an average of 400 metres. This is too long a distance for many passengers to walk.

# Recommendation:

8. That the Standards limit the walking distance required within stations to 100 metres.

#### **Parking**

The comment of a Transport Action Victoria network member in relation to parking was:

"My comment would be in relation to parking and access to facilities.

Consideration needs to be given during local planning and development to both positioning of disability parking areas in relation to person's access to the facilities – is the parking near to the main entry? Are persons exposed to weather conditions? What other vehicles are using the area, ie loading zones - and length and width of parking bays?

"Many disability parking bays are wider than standard bays but not longer. This is an issue when hoists are rear fitted to vehicles. By example, on the lowering of the hoist, our drivers are then assisting a person to exit the vehicle meaning that both the wheelchair occupant and driver are exposed to the car park traffic conditions. It has not been possible to reverse into the bays due to kerbing which prevents the lowering of the hoist on a stable surface or access to the walkway. Another example at a shopping strip, is that the disability park bay is on the main road side and not within the quieter side street where the main shops are located. Again to lower the hoist the driver and wheelchair

occupant are exposed to the main road traffic and unable to access the footpath without walking onto the road/parking area.

Jo Spence, Link Community Transport

#### Recommendation:

9. That the Standards require that disabled parks be located where people can safely exit vehicles and easily access services, from community buses as well as from standard vehicles.

# Reporting of accessibility data

Data on accessibility provides information about how many infrastructure or vehicle upgrades have occurred. However, it does not measure where the accessibility of this equipment is being compromised by it not being operated properly. Thus actual accessibility would be less than reported.

The lack of site specific information about accessibility, also means that community members can't evaluate the accuracy of the aggregate information we are provided.

#### Recommendation:

10. That the Standards require that reporting on compliance be provided site by site, as well as in aggregate.

# Coverage of transport standards

A lack of clarity for ticket scanning devices has contributed to the design of inaccessible scanning devices for the new ticketing system, MYKI, being introduced in Victoria. Despite being mounted on barriers and entry points to stations and vehicles, the scanning devices are being mounted at 1100cm, in excess of the Australian Standards for gateways and checkouts.

As a consequence, some people with disabilities will be unable to scan their ticket on or off unless passing through a staffed check point. Even where assistance is available, people with disabilities are being denied equivalent access to public transport by the new scanning devices.

# Recommendation:

11. That the Standards develop a specific requirement for scanning devices similar to the Australian Standard for gateways and checkouts.

# **Exemptions**

The current permanent exemption for school buses is a particular problem in rural areas, where school bus services are often the only available form of public transport.

Access to these vehicles by community members is increasing as spare capacity on buses is being made available for non-school passengers. These vehicles are also sought after to operate route services or special trips outside of school travel hours, and cannot be used for this purpose unless they are accessible.

Importantly, lack of access to school buses also excludes school children with disabilities from travelling to mainstream schools with fellow students or from participating in excursions. This undermines these students full integration into the

school community as well as creating great difficulty for families in catering for their transport needs.

Further information on the issues presented by lack of access to school buses is included in the submission from Frances Ford, Wellington Shire Council.

#### Recommendation:

12. That the permanent exemption for school buses be removed.

# Consistent standard of compliance

Compliance across the public transport system has been very uneven, with different modes more compliant than others and different geographical areas having achieved different compliance.

The tram network in Melbourne currently has the poorest compliance of tram, train and bus with only 23 per cent of the fleet accessible and less than 4 per cent of tram stops providing accessible boarding.

Compliance is also poor in rural and regional Victoria, where there are very few accessible bus stops or accessible vehicles. This uneven distribution of accessible transport is particularly problematic, as rural Victoria has a higher proportion of older citizens who are more likely to require accessibility features on public transport. See the submission from Frances Ford, Welling ton Shire for more discussion of this issue.

# **Recommendation:**

13. That a timetable of minimum standards for accessibility in geographic areas be included in the Standards in addition to the general timetable.

#### **Timetable**

The current timetable for compliance percentages for infrastructure and vehicles overstates the compliance achieved for whole trips. At present the majority of upgrades have happened in the inner area, providing improved access for trips within the city, however the accessibility from suburban areas on buses and trams – or on trains in peak hour remains poor. Until full accessibility is achieved, seamless access for complete journeys will continue to be compromised for many users.

#### **Recommendation:**

14. That the Standards reduce the period to achieve full compliance to 2022, instead of 2032.

# Luggage storage

One Accessible Transport Watch participant with a vision impairment and diabetes noted that lack of access to luggage facilities compromised his ability to travel independently. In order to travel to Melbourne on V-Line he has to carry around 23 kilograms of equipment and luggage. On arrival in Melbourne, this passenger needs to purchase food and use the bathroom, and cannot carry this volume of luggage with him. His vision impairment means he cannot use the luggage lockers. Traveller's Aid, a non-government service for assisting passengers with disabilities do not store luggage in their facility and cannot provide assistance with luggage lockers. On one occasion this resulted in the passenger having a diabetic induced seizure, as he was

unable to access food and the persistent barriers he faced in gaining assistance created significant stress.

After complaining to Southern Cross Station management, the passenger was informed that 'all passengers including those with a disability are treated equally in relation to assistance with luggage, ie. none are provided with assistance.' It is clear in this case that this discriminates against passengers who cannot travel without luggage and cannot move their luggage without help.

# Recommendation:

15. That the Standards ensure the provision of accessible luggage storage.

# Consultation report on: Melbourne Forum for the Review of the Disability Standards for Accessible Public Transport

# **Background**

On Tuesday 14th of August 2007 a independent public forum was held in Melbourne on the Review of Disability Standards for Accessible Public Transport.

The target audience for this forum was people with:

- An intellectual disability
- An acquired brain injury
- · People who use communication aids

The forum was organised by:

- · Australian Federation of Disability Organisations and
- Victorian Council of Social Service Transport Action Victoria network

With funding support provided by a grant from the Reichstein Foundation.

People who attended the forum were asked a series of questions relating to all forms of public transport and were encouraged to share their experiences.

This report is a collation of the information gathered on the day. The comments are grouped into four areas:

- 1. Access to information
- 2. Transport assistance services and schemes
- 3. Ticketing
- 4. Experiences using different types of transport

# **Access to Information**

The strongest theme to arise at the forum was people's lack of access to information when travelling on any form of public transport.

- Clear and easy to understand information was crucial to making people feel confident when using any form of public transport and making decisions about their journey
- Having a central point where people can call to find out about public transport and the range of services available was suggested.
- People felt that information also needed to be available in a wide range of formats to meet the needs of a range of people with disabilities
- Asking for information directly from a person was the way that most people preferred to receive information

Below are some comments and suggestions relating to some of the ways people access information on public transport now.

# Using the Telephone

- Too many options before you get to a person
- Once you get through to a person it is generally good

# Using the Internet

- · Internet can be hard
- · Timetable information is too small

# Using Timetables

- Print too small on timetables, font needs to be 18 points or larger
- Separate timetables on each line should to be displayed at train stations
- Need a generic design all for timetables
- Self-advocacy groups in the United Kingdom have designed easy to read timetables which would be good to have in Australia

An example of the UK timetables is at Attachment A.

# <u>Using Information Announcements</u>

- Button system on the train station platform is useful, but isn't real time and can be confusing
- If there is a disruption to transport services sometimes there is no information
- Sometimes it can be difficult to understand announcements because of
  - o background noise
  - o static
  - o accents

#### **Services and Schemes**

People believed that there was still a lack of general awareness about the services and schemes that are currently available to assist people with disabilities to use public transport.

This general lack of awareness of services and schemes was seen as attributing to:

- People who should have concession cards not having them.
- Doctors not being well enough informed about how to fill out the required documentation for people to be eligible for assistance schemes
- People not having anyone to help them
- Least supported people being the most disadvantaged
- Misuse of concession cards by other people

Background information about the services outlined below is included in Attachment B.

# Travellers Aid

- Some had used Traveller's Aid, however others had not heard of the service.
- Some people said that they had found it hard to find Traveller's Aid.

# Access Centre in Melbourne

There are no signs from Federation Square to show you where it is

#### Multi-Purpose Taxi Program

- the recently introduced conditions placed on the scheme are difficult and unfair, including having to pay for a replacement card
- Non wheelchair users having a cap on the amount that they can receive at the half price rate
- That the scheme has no way of informing the user of how much allowance remains before their cap is reached.
- · Confusion about whether users have to sign receipts.
- There where also reports of people experiencing difficulties when using their card such as drivers forgetting to give cards back and drivers making up stories about why they can't or won't accept the card.

# Companion Card

- People who attended the forum had little knowledge of the national Companion Card scheme
- Few knew of anyone who used the card.

# **Public Transport Ticketing**

- Ticket machines were found to be too hard to use, with people preferring to buy their tickets directly from a person.
- Some people felt that the myki smart card ticketing system, about to be implemented throughout Victoria, will be better as people with disabilities will validate their tickets like everyone and won't be showed up as different.
- However, other people had concerns about the introduction of myki for people with disabilities and how practical it was going to be to use.
- Ticketing on V-line can be confusing for example, rules of return tickets

# **Experiences using different types of transport**

#### Taxi

Taxi services were by far the biggest area of concern for people attending the forum. These concerns were expressed by both wheelchair users and non-wheelchair users.

When asked whether people had any problems booking a taxi, people had mixed responses. Some people said they had experienced no problems booking cars while one person had experienced difficulty getting to the forum because of the current taxi system.

Some of the common problems experienced when using taxis:

- Booking is easy but cars were often late
- Multi purposes taxis usually have a 40 minute wait, with people having waited up to two hours
- Operators are sometime rude and unhelpful
- Common to miss appointments due to waiting for a taxi to arrive
- No penalties for not turning up and incentives don't seem to work
- Sometimes drivers seem to go the long way around
- Being refused service and feeling blamed for needing help
- No courtesy call to say they are running late
- Some people at the forum stated that they do have regular drivers, but this is no guarantee of good service
- People felt that the service could be improved if there was a single point for bookings

# Trains

People reported that access and services at the two major metropolitan stations of Flinders Street and Southern Cross had improved since they have been upgraded.

One ongoing issue that was identified was the lack of public information about how people in wheelchairs or scooters access the trains either in a brochure or on the platforms.

The difficulties with the current system of wheelchair users having to go to the front of the carriage to enter the train via a ramp positioned by the driver are:

- There is no indication of which direction the train will be arriving from
- The length of the train in relation to where it will stop on the platform

Other issues raised in regards to train transport were:

- Pathways around and into stations were often in need of resurfacing
- Gap between train and platforms is too big and can be quite frightening for some
- · Level crossings were viewed a dangerous to cross if in a wheelchairs

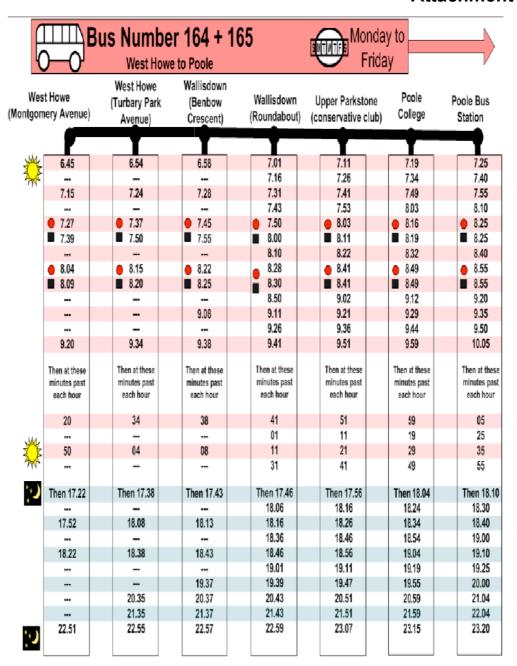
# Trams

People felt that there was some improvement with the low floor trams but they were not operating on every line and there are only accessible stops sporadically placed mainly within the Central Business District.

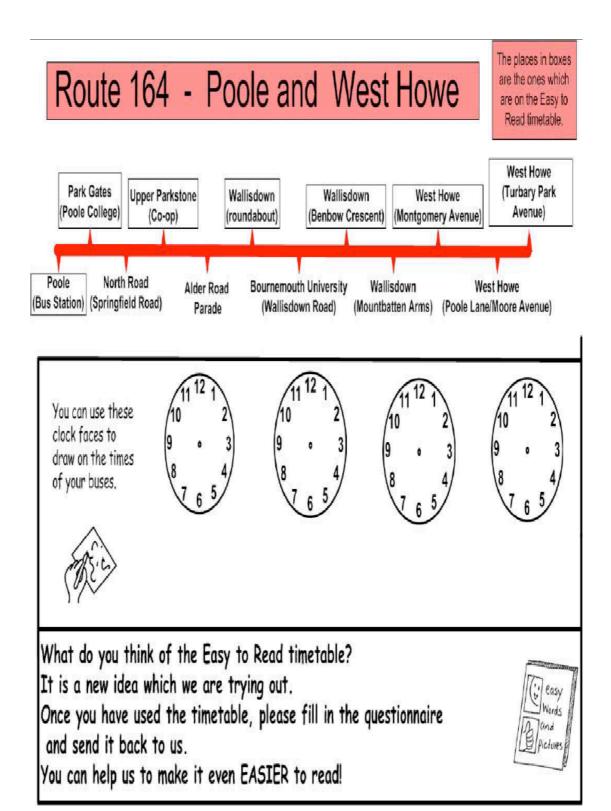
# **Other Comments**

- Some participants reported that they had flown and felt that the system of getting on the plane first and getting off last worked well for them
- Need to treat people with disabilities with more respect and dignity
- · People had experienced accessible toilets on train stations being locked
- Better lighting needs to be installed on all forms of public transport to assist people with vision impairments

# **Attachment A**



**UK Information Provision** 



# Attachment B

# **Background Information about Types of Transport Assistance Provided in Victoria**

# **Travellers Aid**

Travellers Aid is a not-for-profit agency providing a range of services for people travelling to, in, and around, the city of Melbourne. It provides:

- Information for people with disabilities visiting Melbourne and Victoria
- Personal Care for people with disabilities who require assistance with meals, drinks and toileting. Facilities include hoist and adult change table
- Flexible Care Support provided by appointment in the CBD
- Independence Support for the use of public transport, for self advocacy, for training opportunities and community access
- A Welcoming and Safe Base in the heart of Melbourne, with a lounge, T.V.,
   video, café and attendant staff
- Communication Assistance to use the telephone, T.T.Y., Speech to Speech, Accessible computers and Internet
- Social Contact
- Wheelchair Services including most repairs and wheelchair & scooter hire
- Travel Training to learn the skills to travel on public transport independently

# **Melbourne Mobility Centre**

The Melbourne Mobility Centre is dedicated to improving access for everyone in the heart of Melbourne. It loans equipment and has services for people with disabilities, older persons, and those with temporary disabilities, including:

- equipment for hire
- accessible toilets
- proximity to available accessible car parking and/or a drop-off point
- · information for people with mobility and sensory disabilities
- · information about city attractions, events, facilities
- TTY telephone and accessible web access
- scooter battery re-charge facilities
- · accessible tea, coffee and refreshment facilities
- volunteer-driven commissionaire services including companion services, transfer services and 'meet and greet' services

# The Multi Purpose Taxi Program

The Multi Purpose Taxi Program (MPTP) assists Victorians, who are prevented from using public transport because of a severe and permanent disability, to access subsidised taxi transport. The MPTP is a State Government subsidy program administered by the Victorian Taxi Directorate (VTD), Department of Infrastructure.

# **Companion Card**

The Companion Card is a tool to assist organisations that charge an admission or participation fee to comply with existing anti-discrimination legislation. The Companion Card is issued to people with a significant, permanent disability, who can demonstrate that they are unable to access most community activities and venues without attendant care support.

The Card contains a photograph of the cardholder and can be presented when

booking or purchasing a ticket at events and venues, provided the cardholder requires attendant care support in order to participate at that particular activity. Participating organisations will issue the cardholder with a second ticket for their companion at no charge.