Comments on: *The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys V3*

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> *The reasonable man adapts himself to the world: the unreasonable one persists in trying to adapt the world to himself. Therefore, all progress depends on the unreasonable man.*
> *George Bernard Shaw,* Man and Superman

Contents

Summary

The draft Guidelines are a welcome beginning to the process of ensuring accessible public transport journeys. As with all drafts undergoing consultation, matters considered by stakeholders to have been omitted or under-emphasised will be noted. Such matters include:

- The Guidelines are not regulations but offer guidance on how the Objects of the Disability Discrimination Act might be met during a person's 'whole of journey' experience. A clear statement to this effect in the Introduction to the Guidelines, and frequent reminders in the text, would remind the readers that the entirety of the pedestrian and public transport environment is covered by the Disability Discrimination Act and subject to complaint under that Act.
- Consultation with people who have disabilities is mentioned but given too little emphasis. The importance of consultation in reaching accessible solutions that meet public expectations cannot be over-estimated.
- The Guidelines should be included in the various planning instruments developed by Commonwealth, State, corporate and local authorities. They should be quoted as the performance benchmark for the pedestrian and public transport environment.
- Procurement process and policy can ensure that only accessible systems, fixtures and facilities are put into service, but no mention of procurement is made in the Guidelines.
- Project scopes of work must list precinct accessibility as mandatory and allocate realistic budgets to achieve accessible outcomes.
- While apps and digital technology are able to provide vital information they receive too much emphasis in the Guidelines. Information in multiple accessible formats and media should be emphasised.
- Integrated planning and cooperation between the various whole-of-journey stakeholders is emphasised but no indication of who would be the coordinating authority is provided.
- No indication of how third parties such as Telstra will be convinced to report temporary pathway disruptions, or how the transport provider will communicate this information to the travelling public in a timely manner, is suggested.
- Examples of service hailing procedures are given but are rather limited in scope. Further examples of existing procedures should be given.
- The Guidelines have a strong metropolitan focus, with little guidance for authorities in rural and regional areas. Material and examples from rural and regional areas should be included.
- A national electronic ticketing system, allowing easy travel while travelling interstate, must have accessible options for all users.

Comments on the Introduction

The Introduction provides an adequate overview of the Transport Standards the Convention on the Rights of Persons with Disabilities and so on. Regrettably it does not sufficiently emphasise the usefulness of the Guidelines or their place in law.

The Guidelines are not regulations but offer guidance on how the Objects of the Disability Discrimination Act (DDA) might be met during a person's 'whole of journey' experience. A clear statement to this effect in the Introduction to the Guidelines, and frequent reminders in the text, would remind the reader that the entirety of the pedestrian and public transport environment is covered by the DDA and subject to complaint under that Act. The reader might well be the respondent in the case of a DDA complaint and should therefore diligently seek guidance on how DDA responsibilities can be met in order to forestall complaint.

Currently the only statement regarding DDA's applicability to the pedestrian and public transport environment is in clause *3.2 Journey start and end* – 'This part of the journey is not addressed by the Transport Standards, but is subject to broader DDA requirements'. This is an accurate and useful statement but is underwhelming in convincing stakeholders why the Guidelines should be adopted by them and made 'business as usual' practice.

1. Thinking about influencing factors (Section 2): Have the key factors been identified and appropriately discussed? Are there any additional influencing factors that should be included?

2.1 The varied needs of users

Accessibility needs to appear as a mandatory element in the scope of works of every project with a realistic budget that allows delivery of quality products. Procurement of products must also list accessibility as an essential criterion. The lack of this accessibility requirement from project and process inception has been the chief cause of access failures over the past decades.

Procurement policies are an effective way to ensure that only accessible and functional products are put into service and to see that the Objects of the DDA are met. They also oblige industry to lift the quality of its products in order to remain competitive. Procurement policies that require accessible products and systems are therefore essential. Procurement of products and systems that are not particularly accessible,

or not accessible, and which have little scope for improvement once procured, is all too common.

2.2 Universal design considerations

Whilst the referenced documents are laudable they can only be easily implemented under the jurisdiction of single organisations, such as local councils. They give no clues as to how disparate agencies, private and public, can be brought together to plan and implement whole-of-journey considerations or who should be the coordinating agency. Should it be State Departments of Transport or perhaps State Planning Departments? Suggestions would be welcome.

Consultation with people who have disabilities is mentioned but given too little emphasis. The importance of consultation in reaching accessible solutions that meet public expectations cannot be over-estimated. Consultation with local people will allow prioritisation of accessibility work. Consultation with the accessibility reference groups maintained by may State and local authorities permits design solutions to be fine-tuned, or functional outcomes achieved where technical compliance is not possible.

2.3 Drivers of change

The following might be added to the list of change drivers:

New and improved technology: Exponential changes to existing technology and as yet undeveloped technology will open possibilities for service and amenity not currently achievable.

Rising expectations: The public has a continually rising expectation of what constitutes good customer service and what is acceptable in terms of infrastructure. The public also has a growing understanding of rights inherent in the DDA, and an expectation that those rights will be both acknowledged and serviced.

Improved technical Standards: Existing standards for elements of the pedestrian environment are continually improving and new Standards are being introduced. For example, 'AS EN 301 549 Accessibility requirements suitable for public procurement of ICT products and services' has only been published in 2017. Advocates will push for the adoption of these recent and developing Standards as the new compliance or performance benchmarks rather than being satisfied with the often dated Standards cited in existing guidelines and Disability Standards.

2.4 Urban design

Accessible environments must be safe environments or the effort to make them accessible is wasted. Crime prevention through environmental design (CPTED) is mentioned in 3.8.6 in relation to toilets and MLAK keys.

A sense of security will encourage people into public space and as such CPTED should have a far higher profile in the Guidelines.

2.5 Integrated planning

Who should be the driver and coordinator of the integrated planning approach? Who should be involved in the planning group? These questions might be addressed in section 2.5.

Whoever inherits the coordination task should seek to integrate the Guidelines into the planning instruments that are developed by Commonwealth and State government departments, by public and private corporations and by local authorities. Once integrated into the plans as the expected performance benchmarks for the pedestrian and public transport environment the Guidelines will be implemented as matters of both policy and good practice. Argument as to their validity or ignorance of their existence will end as they become 'business as usual' practice.

In most instances it will be a political decision to incorporate the Guidelines in planning instruments. The Disability Sector, as part of civil society and a prominent public voice, should be recruited to the cause and encouraged to make representation to Ministers State and Federal, local members of State and Commonwealth parliaments, mayors and councillors. Industry, seeking certainty in what is reasonably required of them, might also be recruited to advocate for the inclusion of the Guidelines in the various planning instruments that affect the pedestrian and public transport environment.

2.6 Governance and management of places

As per comments in 2.2 and 2.5. A clearer definition of responsibilities and who would be coordinating the management and governance would assist. Incorporation of the Guidelines into the planning instruments that affect the pedestrian and public transport environment will make the owner or activator of the instrument responsible for those parts of their jurisdiction that fals under the purview of the Guidelines.

2. Thinking about parts of a journey (Section 3): Does this section fully describe the whole journey and key considerations across the journey? Are there any other opportunities or issues that need further consideration?

3.1 Pre-journey planning

3.1.1 Providing a richer set of information/data in journey planning tools

Too much reliance is placed on digital sources of information. Information must be as 'rich' in multiple accessible formats as it is digitally.

3.1.2 Provide information in a range of formats
Information technology allows immediate access to high quality information – and this is to be applauded – but for those people on the wrong side of the digital divide this information is largely unobtainable. Information relevant to journey planning therefore must be available in multiple accessible formats. In these formats it must be as comprehensives as that available via apps or online.

3.1.4 Customer service to cover the whole journey
Having up-to-date information on public paths of travel outside their control will require reporting mechanisms to be established between the transport provider and those jurisdictions that control or manage the urban / rural matrix surrounding the transport node. It is not clear how these mechanisms are to be established and maintained, or what the incentive for the other jurisdictions' participation and cooperation will be.

3.1.6 Address Web Content Accessibility Guidelines (WCAG)
The National Transition Strategy has set WCAG 2.0 AA as the minimum compliance level for government websites. WCAG 2.0 AA omits Auslan and audio description, both of which are in the AAA level of compliance. Deaf Australians have varied levels of skill in English, ranging from good to poor. All essential information should have an Auslan alternative and all audio / visual material should incorporate and Auslan interpretation of any spoken information.

3.2 Journey start and end
3.2.2 Pathway quality
It is agreed that 'Pathways leading to public transport nodes should be maintained to a high standard by the relevant authority.' These authorities are compelled by DDA to maintain their assets in the most accessible condition practicable. No action will be forthcoming from authorities that are not compelled to act however, particularly if they are unclear if the matter is their responsibility.

DDA is complaints driven except for those areas in which Disability Standards have been legislated. DDA thus is applicable to the pedestrian environment, but without a legislated Standard it is unenforceable except by public complaint. It is unrealistic to expect the Federal Court to judge basic accessibility questions, so a legislated Standard, embedded in Planning, Building and Traffic Acts that must be followed by all stakeholders is required. Guidelines, policies and technical designs are useful, but only effective when enforced by a legally empowered authority or voluntarily embraced by society. No effort to encourage the Guidelines' adoption into planning istruments and 'business as usual' practice should be spared.

The Guidelines certainly mention regional and rural areas, but may need to provide examples and practices from the regions that illustrate good practice. Crcumstances in small communities differ remarkably from metropolitan areas and so the Guidelines must address the issues unique to regional and rural areas.

3.2.3 Obstructions
Individual regulatory authorities do not have the resources to watch every public transport node and its surrounding precinct. It takes many eyes to maintain accessibility and this is achieved by clearly defining responsibilities and ensuring that the responsibility is being met. Education fails spectacularly when what is asked of a trader or developer is not in their commercial interest or indeed is antagonistic to their interests. It fails equally when it conflicts with established work practices, particularly when it requires more care and effort by the workers.

3.2.4 Precinct planning and coordination
A very simple and inexpensive wayfinding aid not mentioned in the Guidelines is the placement of braille and tactile street signs on the masts of traffic signals that feature audio tactile pedestrian crossing controls. The location of the tactile sign can in effect be heard. City of Sydney and Brisbane City Council both have extensive networks of these braille and tactile street signs in their streetscapes. People with vision impairments have welcomed these signs and commented on their usefulness.

3.2.5 Temporary works
Organisations such as Telstra will need to be convinced that care should be taken with temporary works and that the location of these should be passed on to transport providers in a timely manner. Few traders will miss the opportunity to opportunistically occupy footpath space with signs, goods, al fresco dining, vehicles and such if it is in their interests and enforcement is not rigorous. Convincing stakeholders to operate in a manner that they perceive to be troublesome or not in their interest will prove a challenge. How this might be achieved should be spelled out.

3.3 Public transport stop, station or terminal
3.3.2 Amenity considerations
Amenities that are locked are of little use. Too frequently accessible toilets are locked, with either a sign to contact staff or use MLAK keys to open the unit. This is done on the grounds that accessible toilets are misused by various people. No doubt this is sometimes the case, but public toilets adjacent to the accessible toilet, equally misused, are not locked. The discriminatory locking of accessible toilets is unacceptable.

Other strategies to minimise misuse while allowing easy access are required. One such strategy implemented in Brisbane's King George Square bus station is a call button linked to the security cameras. A call registers with security who are able to remotely unlock the door almost immediately.

3.3.4 Hailing arrangements

Passengers should be able to alert controllers of their presence at a boarding point in order to receive staff assistance to board. For example, on Brisbane bus station platforms people who have vision impairments are permitted to use the emergency phones to contact the bus control room. Bus control take the passenger's name, location on platform, and desired service details and pass these to the driver of the next bus to arrive of the desired service. The driver will then locate the passenger and assist him or her to board.

At Brisbane bus stops customers of Transport for Brisbane who have vision impairments are able to contact the Brisbane City Council call centre with their details as per bus stations. The call centre will then pass their details to bus control.

3.3.8 Ticketing

Travel passes for people who are unable to use electronic ticketing systems due to physical or intellectual disability are not recognised interstate, while Vision Impairment Travel Passes and Disability Parking Permits are. Interstate recognition of travel passes is required. Ideally, a national Disability Travel Pass, as per the national Disability Parking Permit, is the desired product. This pass should be fare gate enable to avoid entrapment at unstaffed fare gates. The Victorian Disability Travel Pass is so enable for myki fare gates, but the Queensland Translink Travel Pass does not open go Card fare gates.

Vision Impairment Travel Passes in Queensland and Victoria will open fare gates. This prevents people from being trapped at unstaffed fare gates. This approach should be taken for all Vision Impairment Travel Passes that are in use in the other States' electronic ticketing systems.

Ultimately, a national electronic ticketing system would permit easy travel for all Australians when interstate. It is likely that this is most easily achieved through pay wave of smartphones that would have had the relevant State's electronic ticketing app installed. While this will suit most interstate travellers it will leave people who are not able to use smartphone apps at a disadvantage. For DDA to be met, alternate means

of electronic payment, such as a national smart card, must be developed as a parallel payment system.

3.4 Public transport service

3.4.1 Limit the need for assistance

Design that minimises the need for assistance must be a mandatory category in any rolling-stock or conveyance procurement. Equally, infrastructure design must aim for minimal need for assistance at the boarding point. These policies and procedures will work to the advantage of both passengers and service providers. If implemented they will avoid situations where newly procured rolling-stock, such as Queensland's NGR trains, is inferior in accessibility terms to rolling-stock currently in service some of which date to the 1980s. The only solution on offer to address this inferiority is extra staff hired to assist passengers who require boarding assistance on current unstaffed platforms.

3.4.2 Audible announcements

Too much emphasis is placed on next-stop smartphone apps. Many people cannot use or afford smartphones. Reliable bus route and next stop systems for buses are in service around the globe. For example, all of London's 8,600 buses were operating the iBus system on all routes by 2009. This system announces next stops audibly and visually amongst other functions. Apart from a reluctance to commit to a system there is nothing preventing Australian buses from offering the same level of service to all passengers.

3.4.6 Consider advertising's impact on accessibility

Semi-opaque wrap around advertising is a feature of many buses. People with low vision have commented that this adverting is a significant hindrance to observation of the streetscape. In the absence of audible announcements clear observation of surroundings is essential to determining when passengers are approaching their stop. A national code on the permitted maximum level of opacity for wrap around advertising is required.

3.5 Interchange

3.5.2 Wayfinding

Consistent, predictable design of interchanges will permit ease of wayfinding even on first visit for people who have been orientated to at least one interchange.

3.5.3 Boarding points

Systems that allow drivers to be alerted that a passenger who requires assistance is waiting on a platform are in place in Brisbane. During peak

afternoon times this is in addition to a concierge style service. Also available at all times are audio announcements of arriving buses, MyTranslink apps and clear LED route displays on the buses.

3.6 Return journey planning
3.6.1 Paired stops
Paired stops should be consistently named but readily distinguishable. For example, 'Kingfisher Creek Inbound' and 'Kingfisher Creek Outbound', or 'Kingfisher Creek 01' and 'Kingfisher Creek 02'. This reduces potential confusion in journey pre-planning or ad hoc planning.

3.6.2 Journey planning tools
Not all passengers can use or afford smartphones. Systems that permit multiple channels for information are required. The value of call centres that can assist verbally or via text should not be underestimated. Legible hardcopy timetables are also appreciated by people who are not technically inclined or able.

3.6.4 Customer service
Little customer service will be available at suburban or rural bus stops. Equally, passengers will be unsupported on unstaffed rail platforms. Remote customer service, whether from call centres or central control stations will be invaluable in these circumstances. Where emergency or help phones are located near boarding points, passengers requiring assistance should be encouraged to use these for assistance. At a policy level transport providers should consider expanding the help phone networks. Help phones should always list a text or SMS alternative for deaf passengers.

3.7 Disruption to business as usual
3.7.1 Disruption management planning
Schedule disruptions should have advanced notice via multiple information channels.

Disruptions may be the result of actions by third parties and occur on areas not the property of a transport provider. For example, Telstra may block access along a footpath as work is carried out on a service pit or other underground services. Other authorities with underground services may similarly block access along public footpaths. These authorities would not regard themselves as having a stake in accessible public transport. Protocols should therefore be established where these authorities report their scheduled worksites to public transport authorities who have infrastructure in the vicinity.

3.7.2 Communication

Wheelchair accessible taxis (WAT) called to service disruptions are sometimes commandeered by able bodied passengers. Where a public transport provider calls a WAT to a service disruption the driver must be held accountable, perhaps with financial penalties, for abandoning the passenger in favour of a better fare from carrying multiple other passengers.

3.8 Supporting infrastructure

3.8.1 Supporting the journey

A means of embedding and enforcing accessibility that meets DDA in a precinct or service's design, maintenance and management is needed. Details of the shape, layout and nature of both the hard and soft infrastructure that support a journey are readily available, being cited in various Australian Standards, Disability Standards, industry Codes of Practice, AHRC Advisory Notes and Guidelines, and so on. For infrastructure and services outside the DSAPT environment however, these are little more than exhortations to good practice unless caught up in the regulatory regime, procurement requirements and customer service charters of the authorities responsible for the precinct or service.

3.8.2 Precinct planning and coordination

Regular forums that allow transport planners and providers to liaise with state and local authorities, private property owners and managers, and other precinct stakeholders will be required to allow precinct planning and coordination.

3.8.5 Positive use of feedback

Transport authorities must be flexible enough to allow passengers to input via the medium that is accessible to them. Apps are entirely in order but should not be prioritised over phone, fax, hardcopy letter or the other means of correspondence and communication used by people who do not or cannot use smartphones or the internet.

3.8.6 Bathroom facilities

MLAK opened toilets should be phased out of service as they benefit only the service provider and present significant barriers to some people with disabilities. Many people do not carry MLAK keys and a large proportion of people with physical disabilities are not able to use keys to open doors in any case. Service providers will protest that IV drug users and others will monopolise accessible toilets if the units are not locked. The same providers usually do not lock standard toilets adjacent to accessible toilets and which are just as prone to misuse. Solutions that allow good security and equal amenity of access to sanitary facilities are required rather than the blunt instrument of lock-out.

3. Thinking about what does this mean for you (Section 4): Does this section provide an effective set of key principles to focus stakeholders in creating accessible public transport journeys?

While sound, the principles only appeal to good practice without providing a mechanism to regulate it. Unfortunately, in budget constrained projects good practice might be acknowledged but will be seldom implemented. Every project has a scope of works and this will not be exceeded. This will particularly be the case where the project or property boundary abuts another jurisdiction's property or area of responsibility and the project is either disinclined or not permitted to carry out works on that adjoining property. Without an overarching imperative imposed on scope of works to be fully inclusive of precinct access by either State or Federal governments current practice will not change.

Procurement policies are an effective way to ensure that only accessible and functional products are put into service and to see that the Objects of the DDA are met. They also oblige industry to lift the quality of its products in order to remain competitive. Procurement policies that require accessible products and systems are therefore essential. Procurement of products and systems that are not particularly accessible, or not accessible, and which have little scope for improvement once procured, is all too common.

4. Thinking about stakeholder collaboration to achieve a whole journey: How can this be best achieved?

Incorporation of the Guidelines into the planning instruments that are developed by Commonwealth and State government departments, by public and private corporations and by local authorities has been dealt with in comments in Section 2.5. Also addressed in 2.5 is the need to recruit the disability sector and industry as advocates and partisans for the Guidelines.

Stakeholders will usually move no further than they are obliged to. It would assist if the collaboration principles were embedded in State Planning and Building Acts as required practices with meaningful penalties for compliance failure. Scopes of Works must be obliged to address the betterment of connectivity for the whole of journey and this betterment must be independently assessed. Forums that bring together precinct stakeholders must have clear terms of reference and funding. Penalties for non-participation will encourage attendance at these forums.

Thinking about best practice examples: Are there any additional best practice examples or case studies you would like to see referenced in an appendix which could further encourage, be used to drawn upon, and potentially facilitate Whole Journey understanding and networking?

Braille / tactile street signs

A very simple and inexpensive wayfinding aid not mentioned in the Guidelines is the placement of braille and tactile street signs on the masts of traffic signals that feature audio tactile pedestrian crossing controls. The location of the tactile sign can in effect be heard. City of Sydney and Brisbane City Council both have extensive networks of these braille and tactile street signs in their streetscapes. People with vision impairments have welcomed these signs and commented on their usefulness.

Braille / tactile boarding point signs

People with vision impairments often report difficulty in identifying their bus boarding point when multiple options are located in close proximity. King George Square bus station in Brisbane has a Braille and tactile sign identifying each of its twelve boarding points. These allow ready identification of boarding point for people able to read these signs.

Directional TGSI trails

Brisbane CBD and Fortitude Valley have extensive directional TGSI trails. These are located in busy open areas such as pedestrian malls, public squares, bus station platforms and railway station concourses. Almost all of these directional TGSI trail connect directly to the entry points for major public transport nodes or lead to boarding points. All are strongly valued by people with vision impairments who were involved in the design of the trails.

Step-Hear audio signs

Step-Hear signs are audio signposts which are detected by either a smartphone app via Bluetooth or by radio frequency via a wrist-worn activator. Successful trials of these audio signs have been carried out in Brisbane's Queen Street Mall and King George Square bus station. At the bus station the signs identify boarding gates and various significant wayfinding decision points. The Mall signs identify where in the Mall people are and in particular identify the escalators leading down to the Queen Street bus station.

Passenger loading zones

Accessible cab ranks are important but passenger loading zones occupy far more kerb space in most cities and are more widely distributed. Brisbane City Council has just completed a program of installing kerb ramps at all of these loading zones in the CBD. A technical standard (Brisbane Standard Drawing https://www.brisbane.qld.gov.au/sites/default/files/201609-bsd-3162_b_loading_zone.pdf) was developed, based on AS2890.6, and is publically available from the Brisbane City Council website.

Changing places toilets

These adult change facilities feature track-mounted ceiling hoists and adjustable-height change tables. Brisbane has twelve units located in places that attract large numbers of people. In particular, the unit in Brisbane City Hall is located in close proximity to two major bus stations and two major rail stations. Others are under consideration, for example at Brisbane airport. These toilets give people who have high support needs the confidence to travel and are ideally located at major public transport nodes.

Bus driver alert calls

On Brisbane bus station platforms people who have vision impairments are permitted to use the emergency phones to contact the bus control room. Bus control take the passenger's name, location on platform, and desired service details and pass these to the driver of the next bus to arrive of the desired service. The driver will then locate the passenger and assist him or her to board.

At Brisbane bus stops customers of Transport for Brisbane who have vision impairments are able to contact the Brisbane City Council call centre with their details as per bus stations. The call centre will then pass their details to bus control.

Pedestrian and passenger disruption alerts

Email and SMS bulletins alerting people about disruptions to the pedestrian environment and public transport services permit warnings in real time. Both Queensland Rail and Brisbane City Council maintain such email lists. While many recipients are private individuals a good number are also media outlets, such as Radio 4RPH, or community organisations that themselves maintain electronic mailing lists, such as Spinal Life Australia and Vision Australia.

Disruptions include a diversity of circumstances such as malfunctioning lifts or rollingstock, temporary closure of disability parking spaces, earthworks along footpaths, civic events attracting large crowds to areas

in the vicinity of transport infrastructure or public paths of travel and so on. In particular, Brisbane City Council informs pedestrians with vision impairments whenever civic events or building works are likely to impede movement along the approximately 2.6 km of directional TGSI trails in the CBD. Forewarned, these people are able to avoid crowds or works that would otherwise unexpectedly block their path.

And it ought to be remembered that there is nothing more difficult to take in hand, more perilous to conduct, or more uncertain in its success, than to take the lead in the introduction of a new order of things. Because the innovator has for enemies all those who have done well under the old conditions, and lukewarm defenders in those who may do well under the new.

Nicolo Machiavelli, The Prince