



Marcus James
Director – Road Safety Policy and Transport Standards
Road Safety and Productivity Branch
Department of Infrastructure and Regional Development
GPO Box 594
Canberra ACT 2601

CC: Therese Sands, Director, DPO Australia

16 May 2017

Dear Mr James

Re: Queenslanders with Disability Network (QDN) response to “*The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys*”

QDN is an organisation of, for, and with people with disability. QDN’s motto is “Nothing about us, without us.” QDN operates a state wide network of members who provide information, feedback and views from a consumer perspective to inform systemic policy feedback to Government and peak bodies. QDN also provides information and referral support to people with disability.

QDN is pleased to provide this brief submission to “*The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys*”. This submission is informed by feedback from members. QDN has over 1400 members and supporters across Queensland. All of QDN’s voting members are people with disability. QDN would also like to acknowledge the work of our member John MacPherson in preparing this response.

QDN was also pleased to attend an invite-only focus group facilitated by representatives by the Australian Department of Infrastructure and Regional Development and member organisations of Disabled People’s Organisations Australia (DPO Australia), namely National Ethnic Disability Alliance (NEDA) and People With Disability Australia (PWDA). QDN looks forward to further opportunities to both collaborate with and inform the work of DPO Australia.

QDN’s vision is a Queensland where people with disability are active and valued citizens, fully included in the social and economic life of the community. QDN welcomes the work of the Department of Infrastructure and Regional Development in developing this guide to assist providers of public transport to create accessible public transport journeys for the whole community. QDN

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believes the draft Guidelines are a welcome beginning to the process of ensuring accessible public transport journeys.

Furthermore, QDN believes now is the time to get safe, secure and affordable public transport right for people with disability. With the continued rollout of the NDIS, it is essential that people with disability have an affordable means to participate socially and economically in their communities, particularly given the potential impact of the loss of the Mobility Allowance and Taxi Subsidy Scheme (TSS) on NDIS participants. Queenslanders with disability have also told us that accessible quality mainstream services are critical to meeting peoples' basic human needs and rights, as well as key to being able to participate socially and economically in the community.

Accessible public transport remains a Commonwealth, State and Local Government responsibility and a right of all people enshrined in international conventions, the National Disability Strategy, and legislative frameworks.

Key feedback

Consultation with people with disability is crucial and its importance needs to be strengthened in the Guide. The importance of consultation in reaching accessible solutions that meet public expectations cannot be over-estimated. Furthermore, QDN believes there needs to be targeted strategies to meet the public transport needs of specific groups, such as:

- Aboriginal and Torres Strait Islander (A&TSI) people with disability
- Culturally and Linguistically Diverse (CALD) people with disability
- Women with disability
- Children with disability
- People with intellectual and cognitive disability
- People with serious mental health issues
- People with disability living in rural remote communities with little or no access to public transport

Good policy and good decision making happens when the people who use the services or products are part of their planning, design, delivery and evaluation from the beginning. It is also critical that decision makers invest in their capacity to listen to, hear and respond to the input from people with disability to deliver good governance and implement a plan that will achieve an all abilities Queensland.

A key example of this is procurement. Procurement process and policy that includes pre-procurement consultation with key community stakeholders, such as people with disability, can ensure that only accessible systems, fixtures and facilities are put into service. QDN is concerned that there is no mention of procurement in the



Guidelines. QDN asserts that any project scopes of work must list precinct accessibility as mandatory and allocate realistic budgets to achieve accessible outcomes.

QDN believes the Guidelines should be cross-referenced in the various planning instruments developed by Commonwealth, State, corporate and local authorities. The Guidelines could also form a set of performance benchmarks for the pedestrian and public transport environment.

QDN cautions against an over emphasis on apps and digital technology in the Guidelines as a means for providing vital information. QDN is aware that many people with disability experience barriers to digital inclusion due to a number of issues such as accessibility, usability and affordability. QDN strongly asserts that information should be available in multiple accessible formats and media. This needs to be further emphasised in the Guide.

QDN welcomes integrated planning and approaches and cooperation between the various whole-of-journey stakeholders that is emphasised in the Guidelines but there is no indication of who would be the coordinating authority for this work.

QDN also notes there is no indication of how third parties such as Telstra will be encouraged to report temporary pathway disruptions, or how the transport provider will communicate this information to the travelling public in a timely manner. This would further strengthen the Guidelines.

Examples of service hailing procedures are given but are rather limited in scope. Examples of existing procedures for people with a sensory impairment or who experience difficulty in alerting they require assistance need to be highlighted in the Guidelines, particularly people who require assistance to embark or disembark a public transport journey.

QDN is concerned that 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 and further consultation should be undertaken with people with disability in rural and remote locations, and community transport organisations that provide transport to people with disability in those locations. This is particularly relevant given the rollout of the NDIS and the loss of subsidies and allowances pertaining to transport.

QDN supports the idea of a national electronic ticketing system, allowing easy travel while travelling interstate. Such a system must have accessible options for all users. This would be in line with the interstate portability of people's services and supports under the NDIS.



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In conclusion, QDN supports the development of “*The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys*” and sees it as a way forward for providers of public transport to provide accessible, safe public transport. Safe, accessible and affordable public transport options are essential for people with disability to be part of community and participate socially and economically. People with disability need access to a range of transport options, subsidies and programs which have the underlying intent of providing access to the same level of transport options the rest of the community experiences. If you require any further information about this submission, please contact QDN on 3252 8566.

Yours faithfully

A handwritten signature in black ink that reads 'Paige Armstrong'. The signature is written in a cursive, flowing style.

Paige Armstrong
Chief Executive Officer