

Vision Australia Submission in Response to The Whole Journey: A Guide for Thinking Beyond Compliance to Create Accessible Public Transport Journeys

Submission to: The Hon. Darren Chester MP, Minister for Infrastructure and Transport,
Department of Infrastructure and Regional Development

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Introduction

Vision Australia appreciates the opportunity to comment on the Consultation Draft Whole of Journey Guidelines released by the Commonwealth Government on 23 March, 2017 (the Draft Guidelines). We also appreciate the invitations to take part in two of the focus groups organised by the Department prior to the preparation of this submission.

Over many decades, we have made repeated submissions and representations around issues concerning various aspects connected to whole of journey access throughout Australia. Regrettably, the enforcement mechanisms in the Disability Discrimination Act 1992 (Cth) and the Disability Standards for Accessible Public Transport (the Transport Standards) have thus far done very little to deliver improved accessibility for people who are blind or have low vision.

We are very disappointed, therefore, that the draft guidelines are not enforceable, lack incentive for compliance, and provide no sanctions for noncompliance. While the Guide establishes a comprehensive set of key principles, its utility in improving accessibility is contentious due to it not being a mandatory reference material. The absence of power to compel action by relevant bodies is not conducive to the removal of accessibility barriers. Hence our community will continually need to advocate for change on a case-by-case basis to enforce accessibility.

Our submission primarily addresses the five guiding questions outlined by the Draft Guidelines. We have developed recommendations against each of the areas being considered by the Department and urge you to act to ensure these are included within your forward program. We also provide general comments. Information about Vision Australia is at the end of this submission.

Recommendations

1. That the Commonwealth Government implements a more effective means for reducing systemic accessibility barriers. A non-enforceable set of Guidelines is insufficient to achieve this goal of accessibility. Moreover, the Draft Guidelines in their current form will not ensure that Australia meets its obligations under the UNCRPD.
2. That Accessibility be 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.
3. More specific examples and descriptions of practical examples would be useful to demonstrate what constitutes universal design. Lack of definitional clarity will impede the ability of policy makers, planners, designers, builders, certifiers and operators to fulfil its expectations.
4. That the Guidelines indicate how the outcomes for which they were produced will be measured. There is little benefit of producing guidelines without any intent to follow up on whether or not the goals they set out are being met.
5. That the Guidelines are expanded to raise awareness of issues unique to transport in regional areas and need to demonstrate a clear commitment by government to rural and regional communities where there is poor and irregular provision of public transport services.
6. That 'audible announcements' of next stops are mandated for public transport so that all services provide relevant information to passengers to enable them to reach their planned destinations independently and safely. The Transport Standards were introduced in 2002, yet it is still the case that buses in NSW rarely provide audio announcements about upcoming stops to assist people who are blind or have low vision. A Disability Discrimination complaint was lodged against Railcorp because of the pervasive lack of audio announcements on NSW trains. Despite the Federal Court's finding of unlawful discrimination by Railcorp, many of our clients tell us that they are still often unsure of their whereabouts when travelling by train owing to the spasmodic, inconsistent and/or poor quality of audio announcements.
7. That there are changes to current zoning regulations which seriously disadvantage our clients, in particular in CBD areas where there is a proliferation of "no stopping" zones that can make it impossible for a driver to assist a person who is blind or has low vision. Severe penalties are imposed on drivers if they leave their vehicle to assist passengers who are blind or have low vision. These should be relaxed or relieved to enable safe whole of journey to be achieved.
8. That an appropriate enforcement mechanism is adopted. Every review of the Transport Standards has attracted submissions that have highlighted the lack of an appropriate enforcement mechanism as a major limitation of their effectiveness, yet nothing has so far been done to rectify this. The end result is that little positive change has occurred for people who are blind or have low vision in the area of public transport in the 15 years since the Transport Standards were introduced. The Draft Guidelines are not a set of standards, nor are they attached to the existing standards and legislation and therefore are not enforceable. We are not confident that guidelines that have no legal force will reduce the impact and extent of accessibility barriers for our community. Even enforceable standards have thus far been ineffective in this regard, and recommendations arising from the reviews of the Transport Standards are yet to be implemented.
9. That the Draft Guidelines emphasise that compliance is integral to the success of the NDIS in allowing people with a disability to realise their full potential and achieve their goals.

General comments

The Draft Guidelines provide an adequate overview of the Disability Standards for Accessible Public Transport and the United Nations Convention on the Rights of People with Disabilities (UNCRPD). However, they do not sufficiently emphasise their utility or their place in law. They offer guidance on how the Objects of the Disability Discrimination Act 1992 (Cth) (DDA) might be met during a person's 'whole of journey' experience. The DDA covers the entire pedestrian and public transport environment. Citizens have the right of complaint pursuant to the DDA where it is perceived that the responsibilities under the Act are not being upheld. The draft Guidelines make a clear statement to this effect in the introduction, along with frequent reminders throughout the text.

Currently, the only statement regarding the DDA's applicability to the pedestrian and public transport environment in the Draft Guidelines 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 they should adopt and make the principles set out in the Draft Guidelines '*business as usual*' practice.

The Transport Standards, and the DDA itself, rely on a complaints-based mechanism for enforcement. Complaints must be initially lodged with the Australian Human Rights Commission, who will attempt to resolve the complaint through informal, voluntary conciliation between the parties. If the complaint cannot be resolved in this way, the Commission will terminate it and the complainant may then proceed to lodge the complaint in the Federal Court, which has the power to make a finding of unlawful discrimination and to make legally binding orders.

While many complaints of disability discrimination are resolved through voluntary consideration, an increasing number of complaints, from our experience, are not. Because the Federal Court is a costs jurisdiction, it is quite rare for a person with a disability to pursue a complaint beyond the Commission's conciliation stage. What this means in practice is that many breaches of the Act and the various Standards remain unreported and unaddressed.

For example, S27.4 of the Transport Standards requires that "*All passengers must be given the same level of access to information on their whereabouts during a public transport journey.*"

The Transport Standards were introduced in 2002, yet it is still the case that buses in NSW rarely provide audio announcements about upcoming stops to assist people who are blind or have low vision. A Disability Discrimination complaint was lodged against Railcorp because of the pervasive lack of audio announcements on NSW trains. **Despite the Federal Court's finding of unlawful discrimination by Railcorp, many of our clients tell us that they are still often unsure of their whereabouts when travelling by train owing to the spasmodic, inconsistent and/or poor quality of audio announcements.**

Thus, in our experience, reliance on complaints-based mechanisms fails to bring about significant improvements in access to public transport for our community at a systemic level.

Additionally, the mere existence of public transport standards has not created a climate where transport providers, planners, designers and so on are mindful of accessibility. Therefore, investment by the Commonwealth Government must be directed towards compliance with the mandatory standards that are already in place. We call upon the Commonwealth Government to implement more effective means for reducing systemic accessibility barriers. A non-enforceable set of Guidelines is insufficient to achieve this goal. Moreover, the Draft Guidelines in their current form will not ensure that Australia meets its obligations under the UNCRPD.

The Coalition of Australian Governments reached 'Principles to determine the responsibilities of the National Disability Insurance Scheme (NDIS) and other service systems'. Within these agreed principles, it is noted that 'the interactions of the NDIS with other service systems will reinforce the obligations of other service delivery systems to improve the lives of people with disability, in line with the National Disability Strategy'. Accessible public transport is considered a universal service obligation – as such, 'The Whole Journey' must consider how the public transport system and surrounding infrastructure can meet this obligation for people who are blind or have low vision.

For many people with a disability, achieving their full potential and achieving their goals as envisaged by the NDIS requires that they be able to travel safely, confidently and with dignity – in other words, in the same way that the rest of the community takes for granted. To that extent, having clear, credible, enforceable guidelines is integral to the success of the NDIS to achieve its intended outcomes.

The following story from one of our employees, who is blind, illustrates the stress that can result from the numerous barriers to bus travel that our clients consistently face.

Case Study

A reflection from a person with disability on their transport experience.

"Thanks to the Trip view app on my iPhone, I can now find out the exact time for my next bus. However, on top of the walking time to the bus stop, I have to factor in extra time to get to the bus stop in case I get tangled up in coffee tables and other footpath obstacles along the building line which the council policies have allowed to be placed in my path to the bus stop.

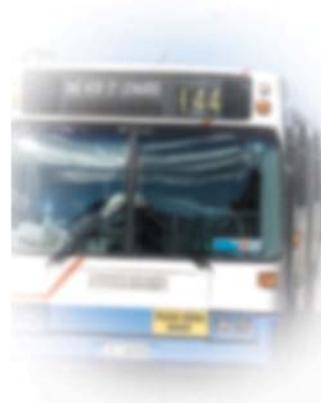


Image above depicts low vision

Once I'm on the bus and have told the driver which stop I need to get off, I am constantly on tenterhooks about whether he will remember, and if he forgets where the heck I will end up!

Frequently I have appointments to get to, and it is not unheard of for the driver to only remember me several stops after the one I needed.

That is only half the stress that I can experience in using busses.

If at the other end of the day I am travelling to visit a friend by bus, I depart from the city at a stop which is in a block with multiple bus routes stopping; and there is often not many people around to assist me to be sure I'm standing at the right stop (amongst several possibilities) for the bus I need.

Several buses line up there, one behind the other. Quite often by the time I have discovered (from asking a passer-by or fellow traveller) that my bus was down the end of the line; then get assistance to try to get to the bus it has left!

If, by a bit of luck I get on the right bus, I then have a repeat of the morning's stress worrying about whether the driver will remember to stop at my friend's stop. Because if I'm let off at the wrong place, I could be just as lost in an unfamiliar environment whether it's 5 metres or 5 kilometres from where I need to be. And I don't feel safe asking a stranger for assistance after dark."

Question 1: Thinking about influencing factors: Have the key factors been identified and appropriately discussed? Are there any additional influencing factors that should be included?

Procurement

The lack of accessibility requirements from project and process inception has been the chief cause of access failures over the past decades. 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.

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 compel 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. For example, the procurement processes for the New South Wales bus fleet do not contain requirements for audio announcements. Consequently, some buses have audio announcements, some do not, and our clients report that buses that do have audio announcements fail to switch them on.

Universal Design Considerations

We note that the Draft Guidelines list '*universal design considerations*' as one of the influencing factors. While universal design considerations are discussed in general terms, more specific examples and descriptions of practical examples would be useful to demonstrate what constitutes universal design. Lack of definitional clarity will impede the ability of policy makers, planners, designers, builders, certifiers and operators to fulfil its expectations.

Integrated Planning

The Draft Guidelines, along with the DDA and Transport Standards, can only be easily implemented under the jurisdiction of single organisations, such as local councils. They do not specify 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?

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 and 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. 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 fall under the purview of the Guidelines.

The Importance of Community Consultation

The Guidelines mention consultation with people who have disabilities, but give it too little emphasis. Genuine, authentic discussion and dialogue is paramount to a complete understanding of access needs and to reaching accessible solutions that meet public expectations, and cannot be over-estimated.

Consultation with local people will allow prioritisation of accessibility work. Consultation with the accessibility reference groups maintained by State and local authorities, permits design solutions to be fine-tuned, or functional outcomes achieved where technical compliance is not possible.

A separate but related issue concerns user testing. For new products and systems, user testing by people with a disability, including people who are blind or have low vision, is essential. There may be compliance with the Transport Standards, but usability does not necessarily flow from compliance. At the design phase, user testing by people with a disability provides insight into the usability and convenience of accessibility features, ensuring that needs are met in line with principles of universal design. In the context of a person's whole journey, however, user testing requires a more detailed analysis of users' journeys, gained through direct feedback from them.

Drivers of change

The Draft Guidelines identify a number of change drivers. From our perspective, another driver of change concerns an increasing awareness, on the part of people who are blind or have low vision, of their rights inherent in the DDA, and increased expectations around what the rest of society takes for granted. Relatedly, we note that the Draft Guidelines do not indicate how the outcomes for which they were produced will be measured. There is little benefit of producing guidelines without any intent to follow up on whether or not the goals they set out are being met.

Regional Areas

An additional influencing factor not highlighted by the Draft Guidelines is the problems related to accessible public transport faced by people living in regional areas, particularly the limited services offered in those areas. Many of our clients tell us that in some areas, there is only one bus service offered per day, and often, the buses lack accessible features that can be found in some metropolitan areas. The Draft Guidelines need to be expanded to raise awareness of issues unique to transport in regional areas and need to demonstrate a clear commitment by government to rural and regional communities where there is poor and irregular provision of public transport services.

Question 2: Thinking about parts of a journey: 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?

Providing a Richer Set of Information/Data in Journey Planning Tools

For our clients, having access to information is integral to maximising opportunities for participation in all aspects of life. For people who are blind, deafblind or have low vision, information provided in a visual form may be difficult or impossible to access. There are many examples of visual

information that are essential to independent and full participation in the community. Transport and travel assistance, such as bus timetables, city maps and parking meters is of particular relevance here. Lack of access to this information is a significant barrier for people who are blind or have low vision to effective participation in many aspects of society.

The Draft Guidelines place too much emphasis on digital sources of information. Information technology allows immediate access to high quality information. However, research we conducted in 2015 to broaden our understanding of our clients' technology usage revealed that smart phone technology is not widely used among older Australians who are blind or have low vision. Most common causes of blindness and low vision are age-related macular degeneration, cataracts and glaucoma. Hence we believe the rate of smart technology usage among our older clients will be similar in the long-term. It is a steep learning curve for people who lose their vision later in life; technology they used prior to their vision loss may no longer be especially user friendly for them as they work through the process of dealing with their vision loss and all that entails.

Accessibility barriers concerning access to information will remain problematic, as there are no national or international standards governing the accessibility of touchscreen-based technology for people with a disability, including people who are blind or have low vision. The absence of standards around the development of smart phone technology means that there is no certainty about whether a particular app (or a new version of an already accessible app) will be accessible. A number of companies, including Apple and Google, have developed methods for making touchscreen-based devices accessible to people who are blind or have low vision, but these solutions are not standardised across manufacturers and operating systems.

Information relevant to journey planning therefore must be available via multiple mediums and the information must be as comprehensive as that available via apps or online. We reject what appears to be the default position, that is, that the development of apps solves issues around accessible information for people who are blind or have low vision. For the rest of the community, using apps is a choice, and therefore, accessing information via apps should not be the only option for the vision impaired community.

Footpath Obstructions

The Draft Guidelines acknowledge that one aspect of the whole journey is '*the journey start and end*' and that the start and end of the journey is a '*challenging part of the journey for transport operators and service providers because they often have no control over conditions surrounding the public transport infrastructure*'.

We agree that the whole of journey covers a person's journey from their front door. This includes navigating local areas and encountering shared footpaths with fellow pedestrians, bikes, bike racks, street furniture, merchandising and footpath advertising. The common practice of businesses extending their operations onto the footpath outside their premises can have a significant negative impact on the convenience and safety of pedestrians who are blind or have low vision. Local government authorities have primary responsibility for the regulation of public spaces such as footpaths in Australia. These authorities must ensure that all street furniture is designed and located on footpaths in accordance with Australian Standards and other benchmarks for ensuring that they do not pose a safety risk for people who are blind or have low vision.

Where enforcement is not rigorous, traders will opportunistically occupy footpath space with signs, goods, al fresco dining, vehicles and such. Convincing stakeholders to operate in a manner that they perceive to be contrary to their best interests will prove a challenge. The Draft Guidelines do not adequately address these challenges.

Maintaining the accessibility of every public transport node and its surrounding precinct can only be achieved by clearly defining responsibilities and ensuring that those responsibilities are 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.

A broader, all-encompassing definition of the whole journey necessitates seamless interaction between guidelines, regulations, pieces of legislation and the Transport Standards before a person's whole journey could be considered fully accessible. This would include links and an effective interface between the Transport Standards and local government rules and guidelines, Access to Premises Standards, Australian Rail Authority guidelines, Civil Aviation Safety Authority regulations, Road Traffic Authority legislation and regulations, Australian Building Code, National Construction Code and Wayfinding Standards (currently under development). This would require substantial collaboration and a simplified system bringing together the many authorities to ensure an accessible whole journey.

Linkages between Transport Providers and Urban and Rural Jurisdictions

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. The Draft Guidelines do not make it clear how these mechanisms are to be established and maintained, or what the incentive for the other jurisdictions' participation and cooperation will be.

Pathway quality

We agree 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 instruments and 'business as usual' practice should be spared.

Precinct Planning and Coordination

A very simple and inexpensive wayfinding aid not mentioned in the Draft Guidelines is the placement of bold, large print, 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. Our clients welcome these signs and have commented on their usefulness.

Temporary works

At present, there are no mechanisms in place for public transport users to be notified in advance of any temporary works or their location. Furthermore, it is unclear whose responsibility it would be to ensure that people are notified of these obstructions in a timely manner.

The Proliferation of No-Stopping Zones

The Draft Guidelines define the start and end of a journey as follows: *'the start and end of the journey that occur outside the public transport system, for example, travelling from home to the stop, station or terminal along a footpath, and then from the stop, station or terminal to the final destination.'* We would like to draw particular attention to the travelling to the final destination aspect of this definition, with reference to taxi services.

Taxi services remain an important means of transport for many people who are blind, deafblind or who have low vision. They represent the closest equivalent to car travel, and are often a crucial link to maintaining employment, gaining an education, and participating in recreational, sporting and other community activities. Our clients often tell us that they cannot receive the assistance they need to travel to their desired premises; there is no appropriate place for taxi drivers to park so they can offer the required assistance. For our clients, there are significant safety implications if a driver is not able to assist them from the vehicle to their destination, particularly in busy, high-traffic areas such as airports and city centres. In New South Wales, for example, current zoning regulations are seriously disadvantaging our clients, especially in the Sydney CBD where there is a proliferation of “no stopping” zones that can make it impossible for a driver to assist a person who is blind or has low vision. Severe penalties are imposed on drivers if they leave their vehicle to assist passengers who are blind or have low vision.

A related issue concerns the inconsistency of the level of assistance offered to people with disabilities at airports across Australian jurisdictions. No airline offers assistance outside the airport terminals. Many of our clients report that they are finding it increasingly difficult to use airports when they are travelling. One significant reason for this is that taxi and other point to point transport drivers are unwilling or unable to provide the assistance they need in getting from the vehicle to the check-in counter. We are, of course, aware of the security issues that airport authorities must address, but security need not, and should not, come at the expense of creating unsafe and highly stressful situations for people who are blind or have low vision.

Once inside the terminals, the assistance offered is fragmented and lacks coordination and clarity of responsibility and the levels of assistance offered varies across the various airlines. In the context of aeroplane travel, the whole of journey process involves taxi travel from home to the airport, assistance to the terminal, the check-in counter, checking in, going through security, finding the boarding gate, and boarding the plane, assistance off the plane, to the baggage collection and then to find a taxi or means of travel from the airport to the desired destination. The lack of predictability in terms of what assistance they are likely to receive causes significant stress to people who are blind or have low vision in planning a smooth journey.

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 are blind or have low vision 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 are vision impaired 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. This method of 'forward notice' imposes a requirement on people who are blind or have low vision, that people without a disability are not expected to perform, as they can visually identify their desired bus service number. This negatively impacts on the ability of people who are blind or have low vision to travel independently, and illustrates the lack of equal access to bus transport services in Queensland.

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. We would like to emphasise that the provision of human assistance should not be used as an excuse for poor accessibility planning.

Audible announcements

The Draft Guidelines place too much emphasis 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.

The Impact of Advertising

Semi-opaque wrap around advertising is a feature of many buses. A number of our clients, who have low vision, often comment that the visual clutter created by the quest for advertising revenue in public transport environments 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.

Interchange and Wayfinding

People who are blind or have low vision should be able to negotiate bus, train, tram or ferry services safely, confidently and independently. The whole journey may involve two or more modes of transport, and therefore need to be connected in a logical way, including those for whom sight is not able to be relied upon. Consistent, predictable design of interchanges will permit ease of wayfinding to connect with services even on first visit for people who have been orientated to at least one interchange. Interchanges need to be connected, navigable and make sense in the surrounding areas.

Boarding Points

Systems that allow drivers to be alerted that a passenger who requires assistance is waiting on a platform were recently trialed in Brisbane, at the Cultural Centre busway station. The additional customer assistance was available during the PM peak period (3.30 PM to 6.30 PM). Our

feedback on the trial highlighted that the trial was a positive initiative that supports people in the blindness and low vision community. We emphasised that the manual provision of audio announcements advising what bus was pulling into the station, and at which position along the station, and direct assistance to identify and board the correct bus were of particular value to our clients. We strongly recommended that the initiative be rolled out on a permanent basis, and extended beyond the PM peak period, across the South-East Queensland busway network. As yet, the Department of Transport has not communicated whether the initiative will continue, or be rolled out. We would like to emphasise that direct/customer assistance is an appropriate interim measure. The ultimate goal, however, is not to have to rely on others, but to travel independently with access to the same information as the rest of the community.

Return journey planning: 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.

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.

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.

Disruption to business as usual: 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.

Supporting Infrastructure (or 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.

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.

Question 3: Thinking about what does this mean for you: 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.

The trend towards industry self-regulation also presents an impediment to enforcing accessibility. Self-regulation largely relies on the goodwill of the transport providers to achieve accessibility. In the context of taxi services, barriers such as inconsistent and inadequate subsidies, lack of disability awareness, poor response times for short trips, and inaccessible fare meters, continue to hinder the independent access to taxi services for our client group.

Given their role as an important transport link to the community, we would like government and the taxi industry to take comprehensive action to remove any structural and attitudinal barriers that limit access to taxi services for people who are blind or have low vision.

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

We dealt with 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 earlier in this submission.

We also addressed the need to recruit the disability sector and industry as advocates and partisans for the Guidelines. Stakeholders will usually move no further than the minimum standards. It would assist if the collaboration principles were embedded in State Planning and Building Acts as required practices with meaningful penalties for noncompliance. 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.

Another way to achieve stakeholder collaboration and cooperation is by sharing feedback generated by complaints management systems with decision makers and user groups across jurisdictions for shared ownership and resolution. This shared knowledge will provide insight into systems that seem to be working well and will therefore assist in improving accessibility more broadly.

At the very least, the Guidelines need to be widely disseminated. One way to do this is to encourage accessibility principles to be included in the content of planning, design and architectural courses.

Question 5: 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 draw upon, and potentially facilitate Whole Journey understanding and networking?

As a general comment, we emphasise that best practice examples need to be accurately referenced. We note that the Draft Guidelines refer to the Bluetooth Beacon Trial conducted by Sydney Trains. At this stage, this initiative is not being progressed.

We provide further firsthand examples of initiatives that facilitate Whole Journey.

Example 1 - 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.

Example 2 - Braille / tactile boarding point signs

People who are blind or have low vision 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.

Example 3 - 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. Directional TGSIs are valuable navigation aids for people who are blind or have low vision.

Example 4 - 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.

Example 5 - 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 and Vision Australia Radio across the nation, 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.

Conclusion

Transport plays an essential role in our ability to participate actively in modern Australian life, whether it is for employment, education, sport or just to meet up with friends or do the shopping.

Vision Australia therefore takes all opportunities to make submissions and representations to inquiries and consultations about public transport accessibility, and we have made numerous and repeated recommendations concerning accessibility barriers. Our fellow organisations in the blindness sector continue to be involved in issues surrounding public transport accessibility at the local, state and national level.

Every review of the Transport Standards has attracted submissions that have highlighted the lack of an appropriate enforcement mechanism as a major limitation of their effectiveness, yet nothing has so far been done to rectify this. The end result is that little positive change has occurred for people who are blind or have low vision in the area of public transport in the 15 years since the Transport Standards were introduced.

The Draft Guidelines are not a set of standards, nor are they attached to the existing standards and legislation and therefore are not enforceable. We are not confident that guidelines that have no legal force will reduce the impact and extent of accessibility barriers for our community. Even enforceable standards have thus far been ineffective in this regard, and recommendations arising from the reviews of the Transport Standards are yet to be implemented.

About Vision Australia

Vision Australia is the largest national provider of services to people who are blind, deafblind, or have low vision in Australia. We are formed through the merger of several of Australia's most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision is that people who are blind, deafblind, or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide

high-quality services to the community of people who are blind, have low vision, are deafblind or have a print disability, and their families.

Vision Australia service delivery areas include:

- Allied Health and Therapy services, and registered provider of specialist supports for the NDIS and My Aged Care
- Aids and Equipment, and Assistive/Adaptive Technology training and support
- Seeing Eye Dogs
- National Library Services
- Early childhood and education services, and Felix Library for 0-7 year olds
- Employment services, including national Disability Employment Services provider
- Accessible information, and Alternate Format Production
- Vision Australia Radio network, and national partnership with Radio for the Print Handicapped
- Spectacles Program for the NSW Government
- Advocacy and Engagement, working collaboratively with Government, business and the community to eliminate the barriers our clients face in making life choices and fully exercising rights as Australian citizens.

Vision Australia has gained unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 26,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of the Organisation. Vision Australia is therefore well placed to provide advice to governments, business and the community on the challenges faced by people who are blind or have low vision fully participating in community life.

We have a vibrant Client Reference Group, with people who are blind or have low vision representing the voice and needs of clients of the Organisation to the Board and Management. Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment.

Vision Australia also has a Memorandum of Understanding with, and provides funds to, Blind Citizens Australia (BCA), to strengthen the voice of the blind community. We also operate Memorandums of Understanding with Australian Hearing, and the Aboriginal & Torres Strait Islander Community Health Service.