

31 May 2017

Director – Road Safety Policy and Transport Standard
Road Safety and Productivity Branch
Department of Infrastructure and Regional Development
GPO Box 594
CANBERRA ACT 2601
AUSTRALIA

Sent by email: dsaptwholejourney@infrastructure.gov.au

Dear Director

The Whole Journey Guide: A Guide for thinking beyond compliance to create accessible public transport journeys

Thank you for inviting the National Association of Women in Construction (NAWIC) to comment on the consultation draft of the *Whole Journey Guide: A Guide for thinking beyond compliance to create accessible public transport journeys (the Guide)*.

NAWIC commends the Department of Infrastructure and Regional Development (**DoIRD**) for its holistic approach to public transport use and desirability and for adopting a 'human centric' approach to public transport accessibility in Australia, especially for those with disabilities.

This submission invites DoIRD to further consider the Guide having regard to issues that NAWIC considers pertain uniquely to women using the public transport network: safety and security. For NAWIC, these issues are particularly pertinent to women with disabilities and NAWIC encourages DoIRD to have regard to women's experiences when planning for the removal of inherent discrimination in Australia's public transport systems.

Background

In May 2016, Plan International Australia and 'Our Watch' commissioned a survey of 600 Australian girls and young women aged 15 to 19 seeking comment about personal safety, gender quality and sense of security in public places.¹ The key findings of the survey included:

- many girls and young women are internalising widely-held beliefs that public places are unsafe for them, particularly after dark, and that it is their responsibility to modify their own behaviour;
- there is a pervasive culture of victim-blaming (eg asking 'what was she wearing?' and 'why was she out after dark?') in response to incidents of violence or sexual harassment against women and girls in public places and this unfairly shifts the responsibility for safety in public places away from the perpetrators of crimes and onto women and girls; and

¹ Plan International Australia and Our Watch, 'A Right to the Night: Australian girls on their safety in public places', May 2016, accessible at <https://www.plan.org.au/~media/plan/documents/resources/a-right-to-the-night.pdf>.

- these perceptions are limiting the rights of girls and young women in Australia and around the world to move freely in public places.

It is NAWIC's submission that these key findings are relevant to the question of what constitutes an equitable public transport network and apply to women with disabilities as well as women without.

Safety and security

The Director will know that section 2 of the Guide sets out 'influencing factors' that 'sit outside the public transport system but which influence the accessibility of a journey using public transport' (p. 8). Three of the factors considered are:

- 'The varied needs of users' (section 2.1) – which acknowledges that people with a disability have their own individual needs and preferences. This section advocates that:

Accessibility should be top of mind in our decision-making, not an afterthought when faced with compliance requirements. This thinking will benefit all users, not just those with accessibility requirements (p. 8).

- 'Urban design' (section 2.4) – which acknowledges:

Adopting urban design principles such as supporting active and interesting building facades that put 'eyes on the streets' can enhance an area's sense of security and safety.

Good urban design can also support wayfinding. Through visual cues in the environment, such as landmarks, views and vistas, and permeable street blocks, a journey's start and end in particular become more comfortable and safe with a clear network of routes and paths (p. 11).

- 'Governance and management of places' (section 2.6) – which acknowledges that a range of stakeholders contribute to the public transport system and its surrounds. Division and separation between and among the stakeholders means that there isn't a party responsible for ensuring that the component parts of the transport network are integrated into a single whole. This section recommends that:

Effective governance and management of precincts and places that interface with public transport is an important aspect of creating whole public transport journeys. A clear vision for the whole, will lead to more pieces fitting together to provide accessible public transport journeys (p. 12).

Key to the creation of an equitable public transport environment and network is an acknowledgement that the experience of women using the public transport network may be different from the experience of men.² In particular, it is NAWIC's position that:

- the use of public transport presents particular risks of harassment (including sexual harassment);

² Bell, W. (1998), 'Women and Community Safety', paper presented at the conference Safer Communities: Strategic Directions in Urban Planning convened jointly by the Australian Institute of Criminology and the Victorian Community Council Against Violence, accessible at http://aic.gov.au/media_library/conferences/urban/bell.pdf.

- women can feel unsafe while commuting to, waiting for and using public transport (particularly at night);
- women may feel anxious using public transport on their own (particularly at night); and
- cumulatively, these factors deny women the opportunity to derive the benefits of the whole of the public transport network.

It is NAWIC's submission that these assumptions are more poignant and experienced more intensely by women who have a disability (particularly those with impaired mobility).

Recommendations

NAWIC encourages DoIRD to expand its thinking in relation to the needs of users, urban design and governance and management of places to facilitate not only a greater sense of safety and security for women using the public transport network, but also, the provision of infrastructure which ensures that the physical safety of women (indeed, all users of the public transport network) is protected and intrusions into women's physical safety are avoided entirely.

Using the 'influencing factors' set out above and the 'parts of a journey' set out in Part 3 of the Guide, NAWIC makes the following suggestions:

- information about public transport (including for the 'pre-journey planning' and 'return journey planning' stages) includes notice as to which stops and stations are well lit, have warmed shelters and café service and are manned by trained public transport or security officers;
- those areas connected to the public transport system (such as car parks) and the stops and stations themselves are well lit, have multiple access and egress routes and 'safe zones' which are well lit, heated (or cooled), staffed;
- the amenity of areas connected to the public transport system and the stops and stations themselves are 'female friendly' and that concrete walls, seating and sheltered areas are not left grey, cold, exposed to the elements and uninviting; and
- ensure that each evening and night service is attended by public transport officers with high emotional intelligence and sensitivity and that a 'safe' carriage³ is set aside for those who desire a greater feeling of safety and security.

These are measures that are capable of implementation in the immediate and short term.

In the medium term, NAWIC encourages DoIRD to further contribute to discourses about urban design. In particular, NAWIC's submission is that DoIRD should seek to influence the creation and content of planning laws such that urban design ideologies and practices inherently account for and pay due regard to women's experiences and sense of safety and security.

³ Refer to Reynolds, E. (2016), 'Women-only 'pink carriages' idea for Aussie trains causes controversy', published at <http://www.news.com.au/travel/travel-updates/womenonly-pink-carriages-idea-for-aussie-trains-causes-controversy/news-story/8377482b8b705dd2854a51d0eb0b7847>.

In the longer term, the cultural discourse about and surrounding public transport and, indeed, women need to fundamentally shift. Ideally, an assumption of women's vulnerability or women as victims would not inform urban design and public transport planning and the perception of women as empowered and entitled would permeate all aspects of social thinking and planning; women will have the same rights and entitlements to access public life as men.

In particular, NAWIC encourages DoIRD to:

- participate in campaigns that support the eradication of violence against women;
- refrain from using language that portrays women as blameworthy in incidents of harassment, sexual harassment and violence against women; and
- make public transport systems and infrastructure welcoming for women and developed and planned in a manner which takes account (and pays due regard) to the particular experience of women on Australia's public transport.

NAWIC again thanks the Director for the opportunity to comment and looks forward to seeing some of the recommendations made in this submission taken into account in the next iteration of the Guide.

Please contact us if you wish to discuss this submission further.

Yours faithfully

Helen Badger
National Chair
NAWIC
0439 953 999

Rebecca Dickson
Victorian Chapter President
NAWIC
0410 439 524