

## Response to Draft Report

### ***The Allen Consulting Group: Review of the Disability Standards for Accessible Public Transport***

#### 1. Introduction

The *Review of the Disability Standards for Accessible Public Transport; Draft Report* appears to provide a lengthy and articulate synthesis of many of the submission / hearing that were made. Many of the findings and recommendations of the draft report were consistent with the findings of the Age-Friendly Buses Project at the University of Queensland.

Unfortunately, it appears that some vital findings and recommendations from our project's original submission have not been incorporated. For example, in our original submission we recommended;

*Part 7.3 – should additionally be included reading;*

*“Shelters*

*Shelters must be provided at all stops requested by the public such that shelters provide a) protection from sun and rain, b) consistent identifying features across the transport system, c) clear visibility of oncoming buses and d) provide seating as described in sections 7.1 and 7.2.*

*Conveyances*

*Buses*

In your draft report you note (p233);

*Part 7: Waiting Areas*

*Stakeholder comments received on this Part*

*No comment was made that directly referred to this Part.*

Therefore, this response highlights some important outstanding issues that were not referred to in the draft report. In your report, you comment that the aim of the Transport Standards is not necessarily to increase patronage for people with disabilities (i.e. by improving the level of service available) but only to remove those inequities that exist between the experiences of people with disabilities and experiences of people without disabilities. This response incorporates the important distinction that you make that;

(p5) In public hearings and submissions for this review, many stakeholders did not distinguish between the different objectives of:

- removing discrimination for people with disability to access public transport on the same basis as all other people in the community; versus
- providing specific transport and support networks for people which meet their needs and allow them to participate in the community.

Therefore, this response highlights only those issues of inequity / discrimination.

## **2. Priority Areas of Inequity**

Our original submission used original research data from surveys conducted with people with disabilities (and people without disabilities) regarding useability of the bus system. These data were used to identify components of the bus trip where the satisfaction of people with disabilities was significantly less than that of people without disabilities. The areas of significant inequity included;

1. Moving on, off and around buses ( $p < 0.001$ )
2. Signage on buses ( $p = 0.002$ )
3. Distance to bus stop ( $p = 0.035$ )
4. Bus stops and shelters ( $p = 0.031$ )
5. Own knowledge about using buses (0.026)

You also note in your draft report (p3) that the Transport Standards are “..envisaged to provide benefits not only to people with disability but to ‘many older Australians..” Our project’s core research has investigated which barriers to using the bus are unique to older people (aged 60 and over). Additional areas of inequity identified by older people included;

1. Driver behaviour – “Bus drivers should be knowledgeable, friendly, and helpful, should communicate effectively, be sensitive to the needs of older people and people with disabilities and wait for passengers to be seated before departing”
2. Pedestrian crossings – “Pedestrian crossings should be available and safe”
3. Footpaths - “Access paths that are even and unobstructed should be available from origin [home / bus stop] to destination [home / bus stop]”

These outstanding areas of inequity are discussed below.

## **3. Moving on, off and around buses**

In the review you note that some inequity remains at this time as a results of 1) compliance timeframes / whole of journey issues and 2) breakdowns of technology (e.g. ramps) or lack of bus driver knowledge on how to use the technology.

These are extremely vital issues in accessibility, but our research highlights some additional considerations which impact on the accessibility of the entry, exit and aisle. These included that 1) the bus driver does not pull in close to the curb and 2) the bus driver takes off before the passenger is seated and “sometimes take off with a jerk”. These represent significant accessibility and safety issues.

Therefore, the following recommendation from the original submission remains pertinent;

- Parts 32-34 should be relabelled as parts 34-36 respectively. A new Part 32 should be inserted with the title of “Service Personnel” and incorporate the following clauses;
- “32.1 General behaviour
- (1) Operators and providers must ensure that all service personnel show appropriate professional behaviours of friendliness and helpfulness.

(2) Operators and providers must ensure that all service personnel are trained in, and exhibit, sensitivity to the needs of people with disabilities and older people.

#### 32.2 Boarding

Operators and providers must ensure that drivers allow appropriate time for older passengers and passengers with disabilities to be seated before the conveyance is in motion.

Conveyances

Buses

Ferries”

### **4. Signage on buses**

Signage on the buses was identified as a significant issue by people with disabilities. Issues raised included the readability of the signage and the placement of the signage. Whilst the issues with readability may largely be attributed to compliance timeframes, the issues regarding placement should still be incorporated into the Standards. While it may seem that issues of placement could be a general preference for the whole of population (i.e. not inequity), the placement of signage has significant impact for people with visual or visual processing impairment (who need signage in predictable places), people with mobility impairments (who may find it difficult to circumnavigate the bus to find signs) or a combination of both. This is supported by the finding that people with disabilities were significantly less satisfied with signage than those without disabilities. Therefore, the following recommendation from the original submission remains pertinent;

Part 17.3 – “If used, destination signs must be placed above the windscreen.” Should be replaced with; “Destination signs must be placed above the windscreen.”

Part 17.3 – should additionally read;

“(4) Destination signs and / or route number must be placed on the back and sides.”

### **5. Distance to the bus stop, Pedestrian crossings, Footpaths**

The draft report describes issues of whole of journey accessibility very well. One important aspect of whole of journal accessibility is pedestrian accessibility and distance to the bus stop. Getting to and from the bus stop is an integral part of the bus journey. The draft report concedes that issues with pedestrian accessibility;

*(p121) .. reflects the stalled process of developing Disability Standards for Access to Premises.*

The Disability Standards for Access to Premises may, in future, regulate accessibility for pedestrian infrastructure. To ensure that this is included, it is recommended that the findings from the submission process for the Transport Standards (related to pedestrian accessibility) should be forwarded to the working group for the Access to Premises Standards.

An additional issue which would not seem to be covered by the scope of the Disability Standards for Access to Premises would be the distance to the bus stop. Distance to the bus stop as a significant limiter to the accessibility of bus systems for people with disabilities. The risk is that this issue may feel ‘between the gaps’ of the regulatory framework. This is unfortunate given the importance of this issue and the potential for remediation (e.g. through route planning technologies or flexible route bus transport).

Therefore, the following recommendation from the original submission remains pertinent;

Part 8.9 – should additionally be included reading;

“Boarding Availability

Services must be provided such that a) public transport is available within 500m of all dwellings and amenities or b) an equivalent service must be offered (including service route transport).

Conveyances

Buses

Ferries

Trains

Trams

Light Rail”

## **6. Bus stops and shelters**

Bus stops and shelters are an important accessibility issue for people with disabilities and older people. The primary finding from our research is the need for appropriately designed shelters. While it may seem that the provision of a shelter could be a general preference for the whole of population (i.e. not inequity), the lack of provision of an appropriate shelter can have a significantly greater impact for people with disabilities and older people. People with disabilities may have difficulty regulating their body temperature in direct sunlight or coping with environmental pressures (e.g. spinal cord injury, diagnoses with related fatigue). Therefore, waiting in direct sunlight / rain may pose significant health risks. This is supported by the finding that people with disabilities were significantly less satisfied with bus shelters than those without disabilities. Therefore, the following recommendation from the original submission remains pertinent;

Part 7.3 – should additionally be included reading;

“Shelters

Shelters must be provided at all stops requested by the public such that shelters provide a) protection from sun and rain, b) consistent identifying features across the transport system, c) clear visibility of oncoming buses and d) provide seating as described in sections 7.1 and 7.2.

Conveyances

Buses

## **7. Own knowledge / experience using buses**

People with disabilities and older people need to know how to use the bus system and have experience of using the bus successfully. Without these two components, older people and people with disabilities will lack confidence in using buses. People with disabilities and older people may have less resources (e.g. endurance) to cope with potential problems in a bus journey (e.g. not stopping the bus in time and having to walk a long distance back to the correct bus stop). As noted in the draft report;

(p77) Several disability organisations also noted that many people with disability remain uncertain about using public transport; they do not feel confident in using public transport.

While a number of people without disabilities may lack confidence in using buses, people with disabilities were significantly less satisfied with their own knowledge and

experience using buses. This remains an area of inequity. To promote accessibility the following recommendation from the original submission remains pertinent;

Part 27.5 – should additionally be included reading;

“Training

All passengers must have access to training on how to use the conveyance and must be provided information on how to access this training.

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Travel training is available on an as needed basis in many parts of the United States of America and the United Kingdom and is anecdotally reported to be very successful. Therefore, the issue of lack of knowledge and experience has potential for remediation.

## **8. Bus driver behaviours**

Findings from our research project have shown that, for older people, the friendliness and helpfulness of bus drivers is the second most important aspect of bus accessibility after the entry / exit. In the draft report it is mentioned that;

(p79) The level of public transport staff training and awareness can lead to different experiences for people with disability, even when using the same service, or with the same operator. The Transport Standards Guidelines (Parts 37.2 & 37.3) state that ‘staff orientation and education programs should enable staff to provide assistance that is helpful without being patronising in language, attitude or actions’, and that customer service programs include awareness education and training in the use of accessible equipment.

Whilst the Transport Standard Guidelines do provide guidance on staff education, this is not sufficient to ensure that this takes place. Guidelines, by their nature, are not prescriptive and are therefore at risk of not being fulfilled. The Standards themselves are part of a regulatory framework with significantly more legislative weight. Considering that bus driver behaviours are one of the most important accessibility issues for older people, the following recommendation from the original submission remains pertinent;

Parts 32-34 should be relabelled as parts 34-36 respectively. A new Part 32 should be inserted with the title of “Service Personnel” and incorporate the following clauses;

“32.1 General behaviour

(1) Operators and providers must ensure that all service personnel show appropriate professional behaviours of friendliness and helpfulness.

(2) Operators and providers must ensure that all service personnel are trained in, and exhibit, sensitivity to the needs of people with disabilities and older people.

Conveyances

Buses

Ferries”

## **9. Conclusion**

Whilst the draft report provides a significant step forward in the review process, the aforementioned outstanding issues require consideration. We greatly look forward to your consideration of these issues for the report.