



blindness and low vision services

21 August, 2007

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By email: dstransport@allenconsult.com.au

Dear Sir/Madam,

Vision Australia is the newly merged organisation incorporating the former businesses of Royal Blind Society of NSW, Royal Victorian Institute for the Blind, Vision Australia Foundation, the National Information and Library Service and recently, the Royal Blind Foundation of Queensland. We are the largest blindness agency in Australia with a long history of professional service delivery.

Our organisation's purpose is to provide assistance to people who are blind or have low vision so that they can access, and fully participate in, all facets of life. For example, our organisation works to remove barriers that prevent people who are blind or have low vision from enjoying equal access and opportunities to participate in all facets of the community. In undertaking this work, Vision Australia promotes awareness to government, government departments, community services and the general public about the barriers faced by people, who are blind or have low vision in a predominantly sight orientated society.

Vision Australia appreciates this opportunity to comment on the review of the Disability Standards for Accessible Public Transport 2002.

Vision Australia believes that since the introduction of the Transport Standards there has been minimal improvement to the accessibility of public transport which can be attributed to the existence of the Standard. Our clients expressed their experiences both positive and negative in consultation forums convened July 2007 by Policy & Advocacy, Vision Australia. We held our client consultation forums in Queensland, New South Wales, Australian Capital Territory and Victoria.

Vision Australia is of the strong opinion that the Building Codes Australia, Australian Standards and the Disability Discrimination Act Transport Standards need to be

consistent with one another in order to be truly representative of people who are blind or have low vision and their access to transport needs.

Vision Australia has submitted its response as per the questions raised in the review.

1. Has the accessibility of public transport improved since the introduction of the Transport Standards?

No. Vision Australia believes that it is difficult to verify whether the minimal improvements to public transport have come subsequent to the Transport Standards or whether it is due to Vision Australia, other blindness agencies and individuals lodging copious complaints to various providers and complaints bodies with regard to the barriers experienced while accessing or attempting to access public transport.

While we acknowledge and appreciate that there have been some improvements pertaining to Tactile Ground Surface Indicators (TGSIs) and their usage, travellers who are blind or have low vision are still encountering train stations, wharves and bus interchanges where the TGSIs have been used incorrectly or worse not at all, putting the traveller who is blind or has low vision at a risk of injury. Further to this point, TGSIs are rarely, if at all, being used to direct travellers to various entry/exit points at train station or bus interchanges. This makes accessing stations and bus interchanges problematic and difficult for travellers who are blind or have low vision.

Similarly, any minimal efforts to improve signage, both print and tactile are defeated by new methods of providing information that is in no way, shape or form accessible for people with a print disability. For example, at train stations information relating to the time, destination and platform of the next train is on a scrolling electronic screen that makes it virtually impossible for a traveller with low vision, and totally impossible for a traveller who is blind, to obtain the required information.

Furthermore, with regard to signage while there have been some improvements to print size, font type and colour contrast which is beneficial for travellers with low vision, the standard does not go beyond the minimum requirement. There is no definitive responsibility on providers providing information for someone who is blind in tactile format when this information is otherwise provided in print format to people who are sighted or have low vision. This gap between print signage and tactile signage needs to be bridged and the words "if used" and "if possible" need to be removed from the standards, section 17.3, to make these requirements mandatory.

As stipulated under the first five year requirements pertaining to information, access to information should be fully achieved by the end of 2007. This is clearly wishful thinking as travellers who are blind or have low vision still have limited, if at all, access to information. For example, announcements on trains, trams and ferries continue to be inconsistent and are non-existent on buses.

In the case of air travel it appears that the transport standard and the DDA are not only not being adhered to they appear to have been made a complete and utter mockery of. This is evident in not only airlines ignoring or choosing to be oblivious to providing travellers who are blind or have low vision with safety instructions in their

preferred format, on occasions denying travellers who are blind or have low vision their services or insisting they travel with a carer at an additional cost and inconvenience.

At the same time, post September 11 and more recent attempted terrorist attacks, national security and airport security has understandably increased. This has meant that a vehicle such as a taxi cannot be left unattended in order for its driver to assist its passenger, who is blind or has low vision, into the check in desks. In addition, the meet and assist team, or the airport security, for varying reasons including company policy, claim they are unable to assist the person, who is blind or has low vision, into or out of the airport terminal.

Airport terminals also now have electronic check in facilities which are inaccessible for travellers who are blind or have low vision. It appears that little thought has gone into making this method of check in accessible for travellers who are blind or have low vision as there is no audible, tactile or Braille components on these machines.

In conclusion, in response to the question of whether or not the transport standard has improved accessibility to public transport, Vision Australia is of the strong belief that despite ongoing consultations with stakeholders and clients, and even trials such as the NSW taxi subsidy scheme card which was welcomed and approved by trial participants, most if not all recommendations are being ignored and swept under the carpet without any explanation.

2. Have these changes matched your expectations of the implementation and uptake of the Transport Standards?

Vision Australia does not believe that these changes have matched our expectations of the implementation and uptake of the Transport Standards.

The Australian Standards and Building Codes Australia referenced in the Standards are not fully representative of contemporary barriers faced by people who are blind or have low vision. They are also out dated and inconsistent with one another requirements. The Transport Standard stipulates one thing, the Building Codes another, the Australia Standards something else, which makes the compliance requirements essentially weak in substance.

The second reason is that the transport standards, such as Section 27, which is access to information, does not articulate what access to information actually is or means for a traveller who is blind or has low vision. The information that is required for sighted travellers does not always suffice for travellers who are blind or have low vision. Travellers who are blind or have low vision require the following alternate information in order to fully access information relating to public transport.

- Tactile Ground Surface Indicators (TGSIs) to inform them of pathways or directions to take and/or of hazards to avoid.
- Announcements to inform them of what bus stop, what tram stop etc they are at and what destination their chosen form of transport will be taking and at what time.

- Signage with good colour contrast, bold and large print. It must also be available in raised tactile letters as well as Braille and be provided through alternate means such as announcements.
- Print information, such as timetables, must be provided in alternate formats such as Braille, audio, website (not in pdf) and through telephone services.
- Taxi drivers numbers must be both on the outside and the inside of all taxis, on all passenger doors.
- Travellers need independent access to taxi fare information.
- Information such as changes due to track work, or station maintenance, must be provided to travellers well in advance through announcements on the train station and on the website. Further to this, there should be trained staff who can assist travellers who are blind or have low vision from the platform to the buses operating in place of the trains. Where this is the case, and buses are operating in place of trains, the driver must announce each and every stop.

3. Do you consider that the level of compliance required at the end of the first five year period is sufficient to have had an impact on accessibility?

Vision Australia is of the strong belief that had the compliance requirements been clear and consistent with the DDA and the Australian Standards then, yes, five years would have been a sufficient time to make access to information accessible for travellers who are blind or have low vision. Vision Australia does not believe that it is unachievable to make access to information available to travellers who are blind or have low vision, some it is already in place it is just a matter of making it consistent and less random for example not having the odd train announcing each and every stop but having all trains announcing each and every stop. Or ensuring that when TGSIs are laid they are laid correctly and travellers have directions in and out of interchanges and stations.

4. To what extent do you consider current data on accessibility are reliable? Can you provide examples of problems with data that you are aware of?

Vision Australia is of the opinion that there is not sufficient research or data pertaining to blindness and low vision in accessing transport.

5. How could reporting of accessibility data be improved for future stages of the implementation of the Transport Standards?

As previously stated, Vision Australia is of the opinion that there is not sufficient research or data pertaining to blindness and low vision in accessing transport.

6. Are you aware of examples where improved accessibility of public transport has led to increased patronage?

There have been improvements with the designs of new trains, such as the Millennium Trains which have large print internal displays on the trains destination as

well as consistent next stop announcements in clear synthetic speech. However, there is no way of a traveller who is blind or has low vision knowing whether or not they will be fortunate enough to catch one of these trains or one of the older inaccessible trains.

Questions For Public Transport Users

7. Has the introduction of the Transport Standards helped you better understand your rights as a public transport user? If yes, in what ways has it done this?

n/a

8. Are the Transport Standards and the accompanying Disability Standards for Accessible Public Transport Guidelines 2004 (No.3)(the Guidelines) a sufficient source of information on your rights as a user of public transport, or have you needed to consult other sources? What other sources have you consulted? How did you find out about these sources?

n/a

9. Are you aware of other users of public transport who appear to be unaware of their rights or obligations? How could this lack of awareness be addressed?

n/a

Questions for Public Transport Operators and Providers

10. Has the introduction of the Transport Standards clarified your obligations as a public transport operator or provider? If yes, in what ways has it done this?

n/a

11. Are the Transport Standards sufficient, or have you needed to consult other sources? What other sources have you consulted? How did you find out about these sources?

n/a

12. Are you aware of other operators or providers of public transport, who appear to be unaware of their obligations? Can you provide examples? How could this lack of awareness be addressed?

n/a

Questions for All Stakeholders

13. Are there areas of the Transport Standards that you consider unclear in terms of the adjustments operators and providers need to make? Please specify.

Vision Australia considers that there are a number of areas of the Transport Standards which are unclear in terms of the adjustments operators and providers need to make for travellers who are blind or have low vision. In regard to clarity and having information at your immediate disposal, without purchasing the Australian Standards that is only available in pdf format or print which is inaccessible to anyone who is blind or has low vision, it is overwhelming for providers and the public transport user. Subsequently this makes it increasingly difficult for a provider and the traveller to understand what is required, what they need to comply with and what their rights are. The areas which are unclear specifically relating to travellers who are blind or have low vision are:

- Section 2, Access Paths. Although the section specifies that you need to have a path clear for travel, and while there may be a clear path centre of a train station platform, this is not always beneficial for a traveller who is blind or has low vision. This is due to the fact that they need something to shoreline with. In most cases, station platforms are lined with rubbish bins, seating, signage and other commuters which obstruct the path of travel. Therefore travellers who are blind or have low vision often have to shoreline using the Tactile Ground Surface Indicators (TGSIs) on the edge of the platform to navigate their way along the platform. This section specifically needs to address this issue as many train stations have awnings that go out to the edge of the platform supported by poles, obstructing the path of travel for a traveller shoring in using the TGSIs.
- Section 17, Signs. With regard to signage, this section needs to clearly articulate to, and educate, providers who are not trained in print disability in order to alleviate barriers regarding poor signage.
- Section 18, Tactile Ground Surface Indicators (TGSIs). Similarly, this applies for TGSIs as the provider is required to independently obtain the Australian Standards 1428 and comply with that particular standard. This is clearly not being adhered to, as TGSIs are being laid down incorrectly and are not consistent. In addition, there has been little research with regard to directional TGSIs marking the way in and out of exit points.
- Section 27, Access to Information. This section does not articulate what access to information actually is or means for a traveller who is blind or has low vision. Yet again making it difficult for providers who are not experts to comply and understand what access to information means for a traveller who is blind or has low vision.

14. Have the exemptions allowed under the Transport Standards (as specified in the previous chapter), reduced the clarity of obligations under the Transport Standards?

Vision Australia believes that providers using this method apply for an exemption which is not always justified to excuse themselves from complying with the Standard. This subsequently weakens the strength of the Standards.

Questions for All Stakeholders

15. To what extent do the Transport Standards allow operators and providers a choice of ways in which they can demonstrate compliance?

Vision Australia strongly recommends that the Standards be more prescriptive in articulating what exactly is required of providers and how they should comply. As it stands, the Standards make statements such as “all information should be accessible” but do not, in any shape or form, stipulate how this should be done. This therefore limits the provider’s choice on how to comply with the Standards.

16. Where Australian Standards or other technical requirements are specified, are these appropriate? Please provide examples where you believe the use of Australian Standards is not appropriate.

Vision Australia believes that where the Australian Standards or other technical requirements are specified, these Standards or requirements are not appropriate. The reasons for this, as previously discussed, are that firstly the Australian Standards and Building Codes Australia are dated and do not reflect the contemporary needs of travellers who are blind or have low vision. Secondly, there needs to be research domestically, as well as internationally, around access to public transport for travellers who are blind or have low vision. Research carried out then needs to be considered through consultations with providers, travellers who are blind or have low vision and all other stakeholders.

17. Are there requirements that have proven to be impractical or difficult to implement? If so, please specify.

Vision Australia strongly believes that the requirements are not difficult to meet, particularly as access to information was a key performance area that was supposed to be met by the end of 2007. As it was considered realistic to have been achieved by the end of 2007 this further prefaces our point that this requirement is not difficult or impractical to implement. Having said this, Vision Australia believes that these requirements were weak in substance as nowhere in the requirements does it actually stipulate what needs to be done and how. For example, under section 27, Access to information, does not go into detail on such barriers as being able to obtain independently the cost of a taxi fare.

18. As a public transport user, are there areas of the Transport Standards where you consider that a more specific requirement for compliance would improve accessibility?

Travellers who are blind or have low vision articulated through Vision Australia’s consultations that their needs with regards to accessing public transport fully and independently are not being met or reflected in the Standards and regulations.

The Australian Standards and the Building Codes Australia are dated and are not reflecting the access needs to the built environment as well as they could for travellers who are blind or have low vision.

For example the requirements need to be revised and there needs to be research into the contemporary needs of people who are blind or have low vision.

Listed below is what clients of Vision Australia expressed through our consultations:

- Signage – needs to go beyond minimum requirement of Australian Standard 1428 incorporating large font size, colour contrast, to be “ bigger bolder brighter”
- Tactile Ground Surface Indicators (TGSIs) – are being used indiscriminately, for example TGSIs were put under an open staircase as a warning for a traveller who was blind or had low vision. Although the intention was there, the TGSIs did not warn the traveller that there was a hazard at head height. This is a classic example of where something other than TGSIs could have been used to rectify the danger. For example, a solid barrier.

Questions for All Stakeholders

19. Do you consider that the requirements in the Transport Standards have been applied consistently across different modes of public transport?

Absolutely not. While Vision Australia appreciates that there may be some justifiable inconsistencies with regard to requirements across different modes of public transport, we believe that it is inexcusable to have one form of transport (trains) announcing stops and another (buses) operating without any announcements at all.

Further to this point, the inconsistencies of requirements pertaining to access to information (Section 27) across different modes of public transport range drastically. Vision Australia strongly recommends that the requirements be written in a way that clearly articulates what access to information entails for travellers who are blind or have low vision as well as how this would differ from one mode of public transport to another.

For example:

- Taxis – The Taxi Subsidy Scheme in NSW is utterly inaccessible to a traveller who is blind or has low vision. The vouchers are a lime green with a slightly darker green and are in eight font print. For obvious reasons the voucher is not accessible for a traveller who is blind, yet they are expected to write in the fare, which incidentally is also not accessible and then sign their name to it. Having a broad sweeping requirement such as Section 27, Access to information, clearly does not suffice.

20. Will any current areas of inconsistency be addressed through the future stages of implementation of the Transport Standards? (see Appendix B)

Vision Australia accepts that this may be the case for various other disability groups. However, considering that access to information is the primary need for travellers who are blind or have low vision and this section of the Standard was to be ratified by the end of 2007, we do not believe, for this reason alone, that any areas of inconsistency will be addressed through the future stages of implementation of the Transport Standards.

21. Do you consider that the current exemptions granted are appropriate? Should these exemptions be reduced over time?

While current exemptions are not largely applicable to the needs to travellers who are blind or who have low vision, Vision Australia is of the strong belief that these exemptions should be revised and assessed as to whether or not those exemptions are still justified.

22. In implementation of the Transport Standards, have the requirements led to a relatively consistent standard of compliance across all modes of public transport? If not, where are the major differences in approach?

No. The reasons for this are because the requirements across the various modes of public transport vary, as well as being weak in substance, thus making the implementation inconsistent. For example, section 18, Tactile Ground Surface Indicators (TGSIs) lacks in substance as it does not specify when and how directional markings should be used. In addition, TGSIs are not mandatory as a requirement at bus interchanges or bus stops.

Questions for All Stakeholders

23. To what extent do the requirements in the Transport Standards address all of the accessibility requirements for people with disability? Are there gaps in the coverage of requirements?

Vision Australia believes that some of the accessibility requirements for our constituents, who are blind or have low vision, are only partially addressed by the Transport Standards. As mentioned previously, we believe that the requirements do not fully reflect the needs of travellers who are blind or have low vision subsequently making the requirements weak in substance and difficult to understand and therefore fully implement.

Vision Australia is of the strong opinion that the way in which the requirements are currently written directly and indirectly exempt providers from implementing them. The reason being, that the requirements are so generic it makes it difficult for a provider who is not an expert in blindness or low vision, even if they had the best intentions, to understand them prior to implementing. For example, a provider will provide a timetable in electronic format to make it accessible for a traveller who is blind or has low vision. However the timetable will be provided in pdf which is in fact

not an accessible format for synthetic speech screen readers and is therefore inaccessible.

24. Does the compliance timetable provide for a gradual improvement of accessibility over the 30 year implementation period? Are there aspects of this timetable that present compatibility problems? How could these requirements be improved?

Vision Australia is optimistic that over the next 30 years all the requirements under the transport standard will have been ratified and fully in operation. In the last five years technology has advanced significantly but this has not necessarily meant that access to information whether it be audible announcements, signage, timetables etc has improved. In fact, it is suffice to say that in some instances, such as train stations with scrolling screen displays which have small font and poor colour contrast, technology has worked against making information accessible for travellers who are blind or have low vision.

25. Are providers meeting their obligations across all aspects of accessibility, which ensures compatibility?

No. Vision Australia is of the opinion that providers are not meeting all aspects of their obligations because:

- The requirements are not prescriptive enough
- The Building Codes Australia and the Australian Standards are dated and need to be reviewed with further research that reflects the contemporary needs.
- There is no consistency between the Australian Standards, the Building Codes Australia and the DDA.

26. Do the requirements of the Transport Standards need to more explicitly recognise the potential other regulatory constraints that impede the capacity of transport providers to deliver the objects of the Transport Standards?

Yes, the requirements of the Transport Standards should indeed take into consideration other contemporary regulatory constraints. For example, the National Security Act which impedes on the access of a traveller requiring assistance in and out of an airport terminal, by not allowing vehicles to be left unpersonned while the driver assists their passenger into the airport terminal.

Questions for All Stakeholders

27. How well are the current arrangements for making complaints about accessibility understood by the public?

Through Vision Australia's consultations, our clients have expressed reservations on the effectiveness of various providers and their complaint handling mechanisms. It is

difficult for our constituents, who are blind or have low vision, firstly to independently access the required information – such as the bus number or the bus driver’s number, or the taxi drivers number – and secondly to know where to lodge the complaint.

28. Are the current processes sufficiently responsive to complaints, or requests for information or advice on the Transport Standards?

Through consultation with our clients, Vision Australia found that our clients who are blind or have low vision are not fully aware of what the Transport Standards are. They are however aware of their needs and that their needs are not being met. For example, a traveller who is blind or has low vision and using a mode of public transport such as a bus is confronted with the following barriers:

- Not being able to independently identify whether or not a bus is approaching the stop
- Not being able to independently identify the bus number or its destination
- Not being able to independently identify when the bus has reached their own stop, without having to rely on the driver

Vision Australia’s Policy and Advocacy Department is often contacted by clients with regards to copious transport complaints and how to go about resolving them. For this reason alone Vision Australia is of the strong opinion that the current processes with regards to complaints are either not sufficiently publicised or clients, through past experiences, have little faith in being able to lodge and have their complaint resolved through the provider’s complaint handling mechanisms.

In summary, Vision Australia would like to conclude by recommending that the requirements under the DDA Transport Standard be reviewed. The requirements under the Standards need to be well researched in order to fully reflect contemporary transport needs. They also need to be prescriptive making the requirements comprehensible to providers and users alike. At the same time they must be realistic in their timeframe of ratification, ensuring that Vision Australia and various other disability groups do not find that sections that should have been ratified and implemented are still pending in a further five years.

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