

Disability Standard for Accessible Public Transport
Public Review Submission

This submission is presented on behalf of the Interagency Access Forum (Vision Impairment).

We would like to thank you for this valuable opportunity to put forward the views of the vision impaired in NSW and ACT. The needs of this group are critical in the development of accessible public transport as they do not have the option of driving themselves and must rely on public transport.

The Interagency Access Forum (IAF) was formed in late 2004 and is a representative committee that is dedicated to promoting the rights and needs of people who are blind and vision impaired, and their access to the built environment including pedestrian safety and public transport.

Members are drawn from the major service providers and consumer advocacy groups in the Greater Sydney Metropolitan region. Membership is composed of representatives from Association of Blind Citizens of NSW, Blind Citizens Australia, DeafBlind Association, Guide Dogs NSW/ACT, Retina Australia and Vision Australia.

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Executive Summary

- 1) Segmented and disjointed approach to the requirements of the DSAPT does not encourage communication between operators and providers resulting in a public transport system that is not consistent and connected in design and does not enable people who are vision impaired to travel independently and with dignity.
- 2) Environmental design – there is a need for a consistent and accessible public transport environment dealing with issues for people who are vision impaired. This includes:
 - a) avoid use of pedestal objects in public domain,
 - b) “clearly defined” access paths in public transport environs, and
 - c) way-finding links between train platforms and entry / exit points for people who are vision impaired.
- 3) Accessible information requirements throughout DSAPT need to address:
 - a) ongoing lack of announcements on all modes of public transport providing current location details
 - b) limited requirements for tactile signage
 - c) associated printed information in accessible formats
- 4) There is a lack of research into needs of people who are vision impaired when utilising public transport.
- 5) Recommend the development of a nationally recognised comprehensive staff training program to educate all service providers, operators and other staff associated with the provision of public transport services.

Detailed Response

This submission uses the questions posed in the Allen Consulting Group’s documentation associated with the Public Review of the Disability Standard for Accessible Public Transport.

Question 1

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

How has the accessibility to conveyances changed? Can you provide examples?

How has the accessibility of information changed? Can you provide examples?

How has the accessibility of infrastructure changed? Can you provide examples?

- Signage has improved for people with low vision but there have been no changes for people who are unable to use print
- Timetables now generally more accessible on line and via telephone
- Use of contrast has increased on conveyances to allow people with low vision to more readily locate doors, handrails and supports

Question 2

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

Do you consider that the changes have matched the (1) compliance requirements and (2) your expectations?

If the changes have fallen short of your expectations, can you provide examples?

The Disability Standard for Accessible Public Transport encourages, in general, that the physical environment should increase accessibility to public transport.

While the adoption of the Disability Standard for Accessible Public Transport has resulted in increased compliance, it has not resulted in an improved attitude toward the needs and rights of people with disability. Many people with vision impairment believe that meeting requirements of the Disability Standard for Accessible Public Transport should be viewed as being a minimum. An example is provided in the response to question 23.

Question 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?

If operators and providers comply with the requirements of the DSAPT there will be an increase of accessibility. However there are areas of accessibility need for people who are vision impaired that do not appear to be covered by the DSAPT.

It should be noted also that there is an expectation that there should not be a reduction of the provisions of accessibility following works, renovation, remodelling or total re-build of facilities associated with public transport.

For example - Platform 4 of Burwood Train Station in suburban Sydney was re-surfaced almost two years ago. In the undertaking of the works, the platform edge Tactile Ground Surface Indicators were removed. Despite numerous requests to the appropriate controlling body from individuals, organisations and the local council, there has been no re-installation of the TGSIs which are required under Part 18.4 of the Disability Standard for Accessible Public Transport. (It should also be noted that this is the nearest train station for people travelling to the premises of Vision Australia.)

Question 4

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

At present there appears to be a lack of research into the needs of people with disability, and more specifically those who are vision impaired, and their use of public transport being conducted in Australia. Whilst it is easy to measure the needs of a person who uses a wheelchair (i.e. best ramp gradients, spatial requirements / size / envelope issues) the needs of the population who are vision impaired have not been systematically investigated in Australia. What is needed? What works? Therefore there is the need to explore these fields so that any data that is counted is not only available but also meaningful.

Many people who are vision impaired living in NSW travel use a Vision Impaired Person's Travel Permit, which allows free travel on most modes of the government supplied Public Transport in the Greater Sydney Metropolitan area. Therefore there is limited ticket data collection as the current pass is shown to the appropriate person and not swiped or electronically scanned, thereby avoiding the usual ticket data collection methods.

Question 5

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

There are numerous other countries tackling the same issues and their data would be relevant for use in Australia. Examples of overseas research are:

Inclusive Transport Environments: Colour Design, Lighting and Visual Impairment - <http://www.rdg.ac.uk/ie/research/fit/fit.htm>

Emergency lighting and Wayfinding Systems for Visually Impaired People - <http://www.rdg.ac.uk/ie/research/eewp/breip9-07.htm>

Disabled Persons Transport Advisory Committee for the UK Government; website contains multiple references to assist with design and provision of services - <http://www.dptac.gov.uk/>

Implementation of research based UK regulations for public transport vehicles with particular reference to contrast in bus and rail vehicles - http://www.sciencedirect.com/science?_ob=ArticleURL&_udi=B7581-4H8DPNP-80&_user=10&_coverDate=09%2F30%2F2005&_rdoc=1&_fmt=&_orig=search&_sort=d&view=c&_acct=C000050221&_version=1&_urlVersion=0&_userid=10&md5=90347d5a8c213b24f9c740c2181419bf

Sign Design Guide a current, comprehensive and in-depth guidance on accessible signage, jointly produced by JMU Access Partnership and the Sign Design Society promotes one for all enabling the provider to meet all signage needs – Book review <http://www.jmuaccess.org.uk/6.asp>

This can be purchased at

http://onlineshop.rnib.org.uk/display_item.asp?n=11&c=473&sc=0&id=360&it=2&l=2

NSW Ageing and Disability Department publication titled Best Practice Manual for the publication and display of Public Transport Information - http://www.its.usyd.edu.au/bus_and_coach_themes/BestPractice.pdf

Transport Canada's article titled Going Places – Access needs of the visually impaired travellers in transportation terminals: Design Guidelines - <http://www.tc.gc.ca/tdc/summary/12900/12940e.htm>

UK Department for Transport Inclusive Mobility guide -

<http://www.dft.gov.uk/transportforyou/access/tipws/inclusivemobility>

Tiresias is an organisation that provides information resources for people working in the field of visual disabilities). They have produced a guide to technology to assist visitors and tourists in a variety of settings including the use of public transport - http://www.tiresias.org/publications/accessibility_visitors/index.htm

Publication from Reading University's Research Group for Inclusive Environments which provides guidance for designers and others on altering and adapting existing non-residential buildings to provide better access for people with disabilities. <http://www.ciria.org/acatalog/C610.html>

This short list provides a limited cross section of what is available and would be applicable for use in an Australian setting.

4.2 Clarification of rights and obligations

Questions for Public Transport Users

Question 7

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

The Disability Standard for Accessible Public Transport provides a guide to many aspects of the Public Transport system and the elements that should be accessible. However it references a range of Australian Standards, which should be noted date back many years. Whilst the numerous Australian Standards references are provided throughout the Disability Standard for Accessible Public Transport, no detail is provided; i.e. Part 2.1 Access paths references AS1428.2 (1992) Clause 18.1 but does not provide the specific detail of that reference.

Australian Standards are not readily accessible for a variety of reasons.

1. Each Australian Standard referenced is available at a cost. The list referenced by the Disability Standard for Accessible Public Transport is available for a total cost of over \$500, Therefore from a monetary point of view the average consumer will not have a comprehensive understanding of the practical nature of the Disability Standard for Accessible Public Transport's requirements.
2. The current format of the PDF and Hard copy versions of the Australian Standards referenced by the Disability Standard for Accessible Public Transport do not allow a person with vision impairment to access the relevant details.
3. There are currently eight different Australian Standards referenced by the Disability Standard for Accessible Public Transport. One has been withdrawn, others superseded and one is no longer available as it is out of print.

Question 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?

Whilst the Disability Standard for Accessible Public Transport references a variety of Australian Standards, it is important that there is also a good understanding of the practical nature of the application of the standards. This is best gained through first hand consultation with the community using the mode of transport.

Question 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?

An education process for people using public transport with materials in a variety of formats and languages written in an easy-to-read manner would greatly increase the knowledge of the rights and obligations of consumers.

Questions for all Stakeholders

Question 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

Provision of information for people with vision impairment. Please see also the response for Questions 22 and 23 for greater detail about the issues associated with the lack of accessible information for people who are vision impaired.

For example audible and/or otherwise accessible indication of the destination of trains, trams, ferries and buses, indication of the next stop, timetable information and an independent means of knowing a taxi fare (such as from a talking taxi metre).

Contrast Nosing on Stair Edges. Within the DSAPT, contrast nosing on stair edges is referenced twice with conflicting requirements within the separate references. AS 1428.1 requires that only the tread edge of the nosing have the contrasting strip; AS1428.2 required that the tread and riser edges have contrasting strips; the Building Code of Australia does not require contrast but does require the application of non-slip edging (BCA D2.13 (e)). This presents a conflict for those providing the edging and a lack of consistency in the design of stairs in the public transport environment.

Question 14

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

The exemption against the use of directional TGSIs on Railway Station infrastructure has reduced the ability of people who are blind to independently negotiate the concourses and platforms of many train stations and to do so with dignity. By not providing the linkage between platform edge TGSIs to the entry and exit points, there is no clearly defined access path to assist people who are blind to locate the entry and exit points at stations.

It should be noted that the Disability Standard for Accessible Public Transport references the 1992 version of the Australian Standard 1428.4 for Tactile Ground Surface Indicators which does not provide this entry and exit linkage, where the later version produced in 2002 does provide this link. Given the requirement of Part 19.1 (2) which requires that “provision must be made for people with vision impairment to locate the exit path in an emergency”, it is suggested that exemptions and referencing be reviewed.

4.3 Flexibility of approach

Questions for all Stakeholders

Question 15

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

Uniformity and consistency in design of the environment assists people with vision impairment to navigate the various elements of the Transport Infrastructure with dignity, and to do so independently. Therefore whilst it is important that operators and providers are able to have flexibility in the ways that they meet the Disability Standard for Accessible Public Transport, for people who are vision impaired, they should seek to design environments that are reliably well designed and that are consistent where possible.

Question 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.

Please refer to response for question 14

Question 17

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

Other responses address this issue

Question 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?

- Part 27 - Access to Information. This section is limited in its application to the various highly visual and print based elements of the public transport system. More specific requirements would give greater accessibility to information for people who are vision impaired
- Part 2 - Access paths should not just be required to be unhindered but also clearly defined. (For further information see answer to question 23)
- Part 17 - Signs should be accessible for people who are significantly vision impaired, not as is currently in the Disability Standard for Accessible Public Transport's vague requirements of "if provided"

4.4 Consistency of approach

Questions for all Stakeholders

Question 19

Do you consider that the requirements in the Transport Standards have been applied consistently across different modes of public transport? No, please see other responses.

Question 20

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

Information requirements and lack of structure with regards to how this should be provided in infrastructure and premises areas, is covered in part by requirements of the Building Code of Australia but this does not provide any information associated with way-finding for people who are vision impaired.

It is not envisaged that this will improve through the planned future stages of compliance with the Disability Standard for Accessible Public Transport.

Question 21

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

Development of new technologies in the future that assist people with vision impairment should reduce the need for exemptions.

For example, Dr John Gill, (Chief Scientist, RNIB, 105 Judd Street London WC1H 9NE or john.gill@rnib.org.uk) has recently published a booklet titled *Accessibility for Visitors who are blind or partially sighted. How technology can help* which covers a range of topics and technologies that will assist visitors with vision impairment in a variety of settings. It is available to download from http://www.tiresias.org/publications/accessibility_visitors/index.htm .

These new technologies will assist people who are vision impaired as they visit areas with which they are unfamiliar.

Question 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?

The Disability Standard for Accessible Public Transport requires that passengers are provided with information that enables them to know their location during a journey (Part 27.4). This has a 100% compliance date of 31 December 2007.

Announcements are "available" on trains in the Greater Sydney Metropolitan area; however they are not necessarily performed on all trains that are reliant on non-automated / human announcements. Even where automated announcements are provided, such as on Millennium carriages, the announcements are frequently turned off. In other modes of transport, regular announcements are not provided at all. Buses have no announcement protocols and ferries do not provide such information as a standard.

It was noted recently that the same provision of information is also required in wheelchair accessible taxis as passengers in the rear are not always able to see the landmarks that enable a sighted person to know where they are and where they are headed. It was also noted that the passenger in the wheelchair who was paying the fare was required to ask fellow passengers if the fare that was requested matched what was on the meter.

This highlights the recurring fact that is raised throughout this submission of the lack of accessible information for people who are vision impaired. This includes the consistent lack of way-finding information to assist people who are vision impaired as they make their public transport journey.

4.5 Compatibility of approach

Questions for all Stakeholders

Question 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?

Sectionalised Approach

On the whole the Disability Standard for Accessible Public Transport provides a sectionalised approach to the concept of a journey on Public Transport, with the various elements and responsibility for those elements divided between a variety of operators and providers which includes both state and local government bodies and those in the private sector. This does not encourage a cohesive approach so that the infrastructure, premises, conveyance, timetabling and staffing all come together to ensure that a journey is possible, or even smooth, dignified and able to be completed independently.

Application to Public Transport: Who designates which bus stops will be made accessible; who pays for the installation of accessible bus stops; who is responsible for the ongoing maintenance; who is responsible for the design and standards for bus stops, particularly as it relates to accessibility.

Accessible Information

Within the Disability Standard for Accessible Public Transport there appears to be a limited recognition that a great number of the activities associated with making a public transport journey are visually based, i.e. signs, timetables, destination information, fare details in a taxi. For a person who is unable to see to get this information, utilising public transport is a tiring and difficult task.

Whilst both Information and Signage are covered by the Disability Standard for Accessible Public Transport, the provisions are extremely vague about what is required. Functionally there has been no recognisable difference in the provision of information.

Accessible Information is required

- Pre-journey (This would include websites and other information in accessible formats to allow journey planning and timetabling decisions)
- During a journey – there is a systemic failure in the provision of this type of information which would be easily solved by either technology or human announcements but that highlights the lack of accessible information for people with vision impairment. (Note:- The most common access complaint to staff at Guide Dogs NSW/ACT concerns the ongoing lack of announcements on trains.)
- Post-journey - to enable continuation to the final destination (For example, this would include the provision of information about the location of bus stops, taxi ranks and street names surrounding a Railway Station's infrastructure).

There is a systemic lack of on-board information provided on most modes in NSW despite the Disability Standard for Accessible Public Transport having a 100% compliance deadline of December 31, 2007.

Accessible information is required across the whole of the Public Transport system, including the need for independently accessible information for taxi fare meters and accessible information identification on both interior and exterior of taxis.

Please see example at end of this question for further demonstration of these difficulties.

Tactile Signage

In the Disability Standard for Accessible Public Transport, there are two references about tactile signage.

1. Tactile numbers are required on the exterior of taxis
 2. Technical specifications *if* signage is supplemented with tactile details.
- This limited amount of non-visual signage does not provide for independence and dignity for people who are blind. The Building Code of Australia requires higher levels of Braille and Tactile signage but this still is limited to entrances, lifts, sanitary facilities and signs that hearing augmentation is available.

There are no provisions within the Disability Standard for Accessible Public Transport that requires the provision of information in a format to assist with way-finding for people who are vision impaired. Some recommendations for tactile signage include:

- Platform numbers
- Bus stops, so that they can be distinguished from other poles where there is no bus stop shelter or structure
- Bus stop numbers, particularly in bus interchanges and areas where there are multiple bus bays with designated stops for different routes. (Carrington Street, Sydney has bus bays A to I. All signage for these bus bays is provided in visually accessible formats only. A person who is vision impaired has reduced access to this information and a person who is blind has no access to bus bay numbering systems and must rely on soliciting assistance from fellow passengers and/or pedestrians.
- Publicly accessible facilities – i.e. toilets
- Way-finding information – i.e. directions to bus interchange, taxi ranks and nearby streets in railway stations. These details are provided in visually accessible signage but not in a format that is accessible for people who are blind.

Tactile signage is available through a variety of providers. It is recommended that there be a consistency in the specifications and location so that it is positioned in a way, place and format that is easily locatable for people who are blind.

Clearly Defined Access Path

The Disability Standard for Accessible Public Transport requires that access paths should be unhindered, or without steps but with compliant ramps

gradients and having a minimum width of 1200mm. This provides limited way-finding assistance for people who are vision impaired.

The lack of a clearly defined access path impacts on a person who is vision impaired as it does not provide an assurance that the way ahead is clear and negotiable.

People who are vision impaired or blind experience a wide variety of functional impacts. Many are capable of being independent, travelling locally and further a-field using a wide range of skills and techniques to be independent. Not all people who are vision impaired use an aid (such as a Guide Dog or Cane) to assist their safety when walking around. Whilst many people receive Orientation and Mobility training, usually people wait until they are quite significantly vision impaired. Orientation and Mobility Training is not a compulsory activity for people who are vision impaired and many people do not wish to receive any training.

Vision impairment in Australia is on the increase. As the population ages, the proportion of people who are vision impaired is increasing. The Centre for Eye Research Australia estimates that the incidence of vision impairment will nearly double in the next 20 years (Clear Insight, 2004). For each decade after the age of 40, the incidence of vision impairment trebles (ibid). Unfortunately there is a high risk of falls linked with being vision impaired (ibid).

Whilst each person is an individual, there are some common mobility traits for people who are vision impaired. This includes a preference to travel where there are fewer hazards and preferably along the building line. This does not mean that the person “hugs” the building line but rather uses it for guidance. The building line offers:

- acoustic (echo-location) and tactile clues to assist with safe travel,
 - allows for the maintenance of independence
 - enables the person to locate easily the entry points into shops / stations
- For a person who has low vision, the building line provides an easily identified visual shoreline.

When a person who is vision impaired encounters an obstacle, there is no easy way to negotiate it. The process for negotiating an obstacle includes:

- Encounter the object,
- Identify the object and
- Establish whether they have veered or it is on their path of travel,
- Negotiate around the object,
- Re-establish their line of travel.

All this must be done whilst maintaining orientation so that the person can reach their chosen destination.

Application to Public transport: This example highlights the need to include “clearly defined” as a requirement to Part 2 - Access Paths:

Rail Stations in the Sydney Metropolitan area regularly are designed with unhindered paths but these are usually not clearly defined.

A classic example is Epping Station, which was re-developed following the introduction of the Disability Standard for Accessible Public Transport. On one side of the Station Concourse is the ticket window with the associated designated queue control (using chrome poles with retractable “seatbelt type” barriers). On the other side of the concourse are the ticket vending machine, seating, roof support pillars and associated glazed panels. This means that the access path is in the middle of the concourse, an area that is only locatable visually. A person using this area without sight is also required to navigate through all the people and locate the entry point without any physical way-finding clues that would normally allow a person who is blind to be independent and dignified. If there was a clearly defined access path, the person would be able to follow this to the entry and exit points, independently and with dignity. They would also be able to locate the entry and exits in an emergency situation.

It is interesting to note that the Human Rights and Equal Opportunity Commission cites on its website the characteristics of a “non-discriminatory” footpath (access path) include

“A footpath should, as far as possible, allow for a continuous accessible path of travel so that people with a range of disabilities are able to use it without encountering barriers.”

and

“In addition the Commission is of the view that the continuous accessible path of travel should extend from the property line with no obstructions or projections in order to provide the best possible guidance line for all users including people with a vision impairment.”

(http://hreoc.gov.au/disability_rights/faq/Access/access.html#footpath)

Good environmental design

The Disability Standard for Accessible Public Transport requires that “Poles, Columns, stanchions, bollards and fixtures must not project into an access path” and those that “abut an access path must have a luminance contrast with background of not less than 30%”. However this raises that luminance contrast is of no benefit to a person who is significantly vision impaired, particularly as the Disability Standard for Accessible Public Transport does not provide for a “clearly defined” access path. Therefore it is recommended that there be an encouragement for good design that avoids completely the use of fixtures that are hazardous for people who are vision impaired.

For example –Pedestal objects such as the current public telephone design generally has a small ground level footprint with a bigger and bulkier head height surround. These telephone booths are hazardous for people who are vision impaired as the cane does not locate the ground level indicator of the hazard prior to the person hitting into with their head.

These types of designs should not be used anywhere in the public domain rather than being required under the Disability Standard for Accessible Public Transport to have a luminance contrast.

Another example of the need for good design is the underneath of stair cases along access paths, most commonly encountered on train platforms. In the Disability Standard for Accessible Public Transport, Tactile Ground Surface Indicators (TGSIs) are required for overhead obstructions below a height of 2000mm . However a more effective method is to provide a suitable physical barrier under the stairs so that the area under 2000mm is not accessible. The stairs at Epping Station provide a prime example of the use of a barrier for an overhead obstruction below a height of 2000mm. A simple multi-railed chrome pole fence has been installed so that there is no need to use TGSIs, yet it effectively prevents all people from encountering the hazard. This effective method can be used for many overhead obstructions.

It should be noted however that Tactile Ground Surface Indicators (TGSIs) have a key role in providing information to people who are vision impaired. The AS1428.4 definition of TGSIs is “Areas of raised ground surface texture, treatment, designed to provide pedestrians who are blind or vision impaired with warning and/or directional information (to assist with orientation).” This is done through their luminance (or colour) contrast so that they are visible to those with low vision as well as their textural contrast (their raised profile can be felt through shoes as well as with a long cane). It should be noted that warning TGSIs do not provide any information about the nature of the hazard but just that there is a hazard ahead. Therefore the use of good design should take precedence over the installation of TGSIs.

The current 2002 Australian Standard 1428.4 for Tactile Ground Surface Indicators provides detail about their purpose and also warns against their proliferation or overuse. It should be noted that AS1428.4 – 1992 is referenced in the Disability Standard for Accessible Public Transport. In most parts, AS1428.4 - 2002 encourages the use of good design and minimises the use of TGSIs except in areas where they are most needed. For example: “TGSIs will not correct bad design or make an unsafe environment safe”

“TGSIs should:

- be used where there is insufficient alternative or “natural” tactile clues
- not be proliferated unnecessarily
- not be used to compensate for bad design”

(Foreword of AS1428.4- 2002)

“The design industry should not over-use or over-prescribe the installation of TGSIs, but rather make full use of the range of environmental guidance features available so as to minimise the inconvenience to other members of the community” – AS 1428.4 2002 Appendix B 1

- “Consistent use is imperative to increase public understanding”
- “TGSIs should not be installed unnecessarily.”
- “Good design practices should minimise the need for TGSIs to be installed”

(AS 1428.4 2002 Appendix B3)

The only area for use of TGSIs that is not covered by the Disability Standard for Accessible Public Transport's requirements for the installation of TGSIs covers linkage between entry and exit points at stations and the platforms. These links provide orientation and assist people who are vision impaired to make their way independently out of the station.

Therefore there is the need for a judicious use of TGSIs within the Public Transport areas that provide suitable warnings where no other options are available, i.e. platform edges and directional clues to link entry and exit points. However good design should be used to avoid the need for their use in other situations such as under walkways and stairs, and around items that are otherwise deemed hazardous such as pedestal phone booths.

An informal survey of people who are vision impaired reveals that the mostly commonly preferred application of TGSIs is those applied at platform edges.

Public Transport Scenario

Think about a person who is vision impaired living in a suburb in outer Sydney needing to see a medical specialist in inner Sydney. Take the journey with them. There are many elements of the journey that require vision, but they are significantly vision impaired and are unable to see to read.

- 1. They leave home to go to the bus stop. The local council has not installed an access path to the nearest bus stop so they have to walk in the gutter or on the side of the road. (Part 2.2)*
- 2. They have lived in this area and have received Orientation & Mobility training, so they know where to locate the bus stop. (Guidelines 1.25)*
- 3. Without training they would be unable to identify the bus stop as signage is inconsistently located throughout their suburb. Some are just a yellow "bus stop" sign on a telegraph pole, others are a pole with a sign on top but this is not readable for them. (Part 27.1)*
- 4. Their friend can locate their nearest bus stop as the bus shelter is located right in the middle of the footpath. (Part 2.1)*
- 5. They stress as they wonder if the bus driver will know to stop and collect them as they are unable to see to hail the bus. (Part 8.8)*
- 6. Prior to boarding the bus, they must ask the bus driver if this is their specific bus. There is no way of knowing if this is the bus that goes to the station and not the one that terminates at the shops. (Part 17.4)*
- 7. Once on the bus they must concentrate on the route that the bus takes or ask other passengers so that they know their location. (Part 27.4)*
- 8. Once they reach the bus interchange at the station they must locate the stairs and go up to the concourse. Whilst the path is unhindered for a person with mobility impairment, they must negotiate the concourse carefully as there is no clearly defined access path. On one side of the concourse there are seats and the stairs and lifts down to the bus interchange. On the other side of the concourse are the ticket machines and ticket windows. (Part 2.1)*
- 9. Once at the gate, it is not manned so they cannot ask about the platform for their train, is it platform 1 or 3 today? They hazard a guess and decide to try platform 1, but again there is no clearly defined path between the gate and the stairs, just a whole lot of open space and lots of people. (part 27.1)*
- 10. There are stairs without barriers underneath so they hesitantly walk along the platform to a suitable place to board. (Part 2.5)*
- 11. Once on the platform, they listen for the platform announcements which provide details about the next train's destination. (Part 27.1)*

12. *After locating the door and negotiating the crowds getting on and off, they locate a seat and the train starts its journey.*
13. *There is one announcement just after leaving that lets them know that they have caught the correct train, but for several stations there are no more announcements. Was it stop number 11 or 12? After asking a fellow passenger, they safely alight from the train. (Part 27.4)*
14. *By crossing the Tactile Ground Surface Indicators they know that they are away from the train. (Part 18.4)*
15. *But where is the exit? Thank goodness for a lady wearing high heels. It's easy to hear the direction in which she is heading and to follow her towards the exit, but she is some distance ahead when she turns to leave the station. How then to know when to turn? There are no Tactile Ground Surface Indicators to link the platform with the entry and exit points so that they know when the exit has been reached. (Part 19.1 (2) and Part 18)*
16. *Once on the concourse there are no signs that are accessible or that have tactile print to assist with knowing where the exits are located and which street is which. It is now time to stop and ask another person. Fortunately that person is a local and is able to provide good directions. (Part 17, Part 17.6)*
17. *On the street the challenge is to locate the taxi rank and hope that there are taxis in the zone and not just cars parked illegally. (Part 17.7)*
18. *Thank goodness they brought the long cane today so they don't have to worry about the taxi driver refusing to take their Guide Dog. (DDA)*
19. *As they arrive at the Doctor's rooms they think that they are not surprised that they are exhausted.*

Without accessible information, way-finding methods and the judicious use of TGSIs in conveyances, infrastructure and premise, it continues to be both difficult and stressful to take a public transport journey independently and in a dignified manner.

Question 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? The government needs to ensure that information is accessible and consistent to all members of the community throughout the period covered by the DSAPT. This has not been the case thus far.

Question 25

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

Apart from the issues raised in response to question 23, the following additional issues are noted:

- Lack of integration between modes and infrastructure
- Ticketing and integrated ticketing – lack of accessibility for people who are vision impaired as this is envisaged to use visual methods
- Bus stop placement, often located in the middle of pathways and often without the required minimum access path to move past.

Question 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?

Please see response to question 23 and also question 13.

4.6 Certainty of process

Questions for all Stakeholders

Question 27

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

There is the need to encourage Operators and Providers to make changes to meet the Disability Standard for Accessible Public Transport requirements that are timely, well researched, practical and cost effective. Under the current Disability Standard for Accessible Public Transport methodology for compliance there does not appear to be any incentive to meet the compliance timetable. From the experiences for those working in the disability field, it would appear that there are many organisations that “gamble” on no-one taking the time to work their way through the complaints process. Therefore the compliance system should not rely on consumers to engender change but rather a broader industry attitude change. Consumers have a lack of resources and as discussed previously do not always have the education about the specific requirements of the Disability Standard for Accessible Public Transport. There is the additional issue of a costly legal battle that is required to make any systemic change.

If the government was responsible for enforcing compliance to the standards without the need for a complaint by a consumer and if the industry was subject to scrutiny by a regulator with fines for non-compliance, this may provoke a change in attitude.

Question 28

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

The following is an example from a person who is vision impaired of their issues associated with the current complaints process. It demonstrates that the complaints process allows a person to raise the issue but does not guarantee that there will be systemic changes following the complaint.

“Blaxland Railway Station in the Blue Mountains was recently upgraded at the cost of \$4.1 million, to make it accessible. Lifts and ramps were installed, and [warning] TGSIs along the edge of the platform. However no directional tiles were installed to indicate exits to stairs or lifts. A complaint was made to HREOC under the DDA, and was dismissed as RailCorp would not conciliate.”

The Human Element

An area that is lacking in the questions raised by the Allen Consulting Group (as above) is the human element associated with the provision and delivery of public transport. Whilst many providers and operators are aware of the requirements for making the environment accessible, the human element can also be a major reason why people who are vision impaired find using public transport not to be a positive experience. Therefore it is recommended that the need for Education for operator and provider staff is taken from the Guidelines and is included in the body of the Disability Standard for Accessible Public Transport.

Disability awareness training is required not only for staff who are involved with the face-to-face provision of services but for **all staff at all levels**. This would also include those responsible for the development of services and timetables, designers of environments associated with public transport, and the operators providing information to those planning a journey.

Staff Training should be regular and repeated. It should develop a set of skills to provide practical assistance but more importantly a ready, comfortable and easy ability to communicate effectively with all public transport users not just those with a disability.

For example – All new bus drivers with Sydney Buses and all new taxi drivers in the Sydney Metropolitan area participate in training packages that provide them with these skills, particularly focused on interaction with people who are vision impaired.

If appropriate training in how to interact and assist people who are disabled was provided to staff employed across all modes of public transport, the results should lead to a reduction of inappropriate and negative interactions that can reduce the desire to utilise public transport.

Therefore it is recommended that a course for public transport industry be developed under the Australian Qualification Framework or other nationally recognised training development and provision protocol. This would cover the basics of education for a variety of subjects relating to the provision of customer service to people with a disability as well as industry specific needs such as bus drivers, rail staff, taxi drivers, web designers etc.

Application to Public transport: The following is a comment from a member of the Interagency Access Forum:

For example web page information such as timetables needs to be presented in an accessible way - which probably means using basic W3 HTML accessibility standards without resorting to the excessively clever use of Java pop ups for example. I note that trip planner on www.131500.com.au web page, though perhaps a little tedious (reflecting the nature of using screen reading software), seems to work well.

Therefore if web design staff received appropriate training, they would be aware of not only their rights and responsibilities but would also be aware of the tools that they can use to provide their service in an appropriate and accessible format.