



Cr. Tim Laurence
MAYOR

22 April 2013

*Disabilities Transport Access Secretariat
Transport Access Section
Road Safety and Transport Access Branch
Department of Infrastructure and Transport
GPO Box 594
CANBERRA ACT 2601*

Dear Disabilities Transport Access Secretariat,

***SUBMISSION TO 2012 REVIEW OF THE DISABILITY STANDARDS FOR
ACCESSIBLE PUBLIC TRANSPORT 2002 (TRANSPORT STANDARDS) ISSUES
PAPER***

I am writing on behalf of the Darebin Disability Advisory Committee (DDAC). DDAC acts as an advisory body to Council on issues relating to access and inclusion for people with a disability in Darebin. DDAC is chaired by a Councillor and its membership is made up of community representatives with a disability, unpaid carers, local disability service providers, and relevant Council staff.

We would like to thank the Department of Infrastructure and Transport for the opportunity to feed into an important issue which impacts the lives and independence of people with a disability and their carers, to different extents, throughout Australia.

To set some context Darebin has a population of over 134,000 residents, with 5.9% reporting needing assistance in their daily lives due to disability, compared to 4.6% Australia wide. Additionally Darebin has an ageing population, with 26.3% of residents aged over 50 years compared to 32.3% Australia wide.

This submission will be addressing some of the key questions posed under Section C of the issues paper.

Section C: For disability sector and public views

1) Has your accessibility to public transport improved since the commencement of the first Transport Standards review in 2007?

a) How has your accessibility to conveyances (eg trains, buses and coaches, trams, ferries, wheelchair accessible taxis and aircraft) changed? Can you provide examples?

There has been an increase to accessible public transport services within the municipality of Darebin. Examples include the provision of low floor buses through Darebin, upgrades to bus shelters and upgrades to some of Darebin's train stations resulting in increased safety and access.

However within these positive examples where additional resources have been allocated to increase the accessibility of public transport there are equally other examples demonstrating (1) a lack of consistency in allocating resources to support whole journey accessibility or (2) a disconnection between the Department of Infrastructure and Transport and other government agencies at a local, State or Federal level that have an integral role in implementing the disability standards and building capacity for communities to be accessible and viable to all individuals.

Lack of whole journey accessibility

Darebin has had an increase in accessible public transport services, however disproportionately; the increased access that has been provided by the installation of accessible platform tram stops along routes 86 and 112 has not been matched by an accompaniment of low floor trams functioning on these routes.

Inconsistency in upgrades

Upgrades to train stations (eg. Reservoir train station) have involved platforms being resurfaced, achieving a smooth and accessible path of travel. However the degree and slope of the platform was not corrected at the same time, resulting in safety and access concerns. The platform slopes towards the train which could result in prams and mobility aids rolling off the end of the platform or towards an oncoming train. The angle of the slope also leaves a considerable gap between the platform and the train, causing safety concerns for people with vision impairment or difficulties with depth perception.

b) How has your accessibility to information (eg, maps, timetables, announcements, etc.) changed? Can you provide examples?

Accessible information to passengers using trains

Section 27.1 states that information about transport services must be accessible to all passengers. A recent example where this was not provided involves Bell Station (South Morang line) where an announcement was made regarding the delay of a train. The audible announcement could only be heard on the platform itself. Passengers waiting inside the train station were unable to hear the information as there is no audio system installed inside the train station.

Recommendation 1

Develop an audit tool based on the Standards to identify access features that should be provided at each station and/or stop and along each route (trains, trams and buses).

Recommendation 2

Publicise the results of the audit tool on all transport provider websites. The results will include information relating to access provided and access features needing to be implemented or upgraded, at each station and/or stop and along each route (train, tram and bus). A similar example would be the My School website.

c) How has your accessibility to infrastructure immediate to boarding a conveyance changed? (eg, any structure or facility that is used by passengers in conjunction with travelling on a public transport service). Can you provide examples?

Boarding points on trains

There is only one boarding point for a person with a mobility aid boarding a train. On Melbourne trains, this is the first door of the front carriage directly behind the driver. It often requires travelling the full length of the platform, meaning that a person, who needs assistance boarding, needs to be early in order to be in the correct spot before the train arrives. Unlike other passengers who have the option of arriving as a train is pulling into a station. Otherwise they risk not being seen by the driver or not allowing enough time for the driver to put out the boarding ramp and still depart the station on time. It also requires a person to wait at a designated spot on the platform. Not all platforms have shelter provided at this spot, resulting in many passengers waiting in all types of weather.

Only having one boarding point to the train for a person using a mobility aid can also cause difficulties during peak travel times. If the front carriage is full, a person/s

might be forced to miss the train and wait for the next one, which may very well result in the same experience occurring.

These examples not only highlight the inequitable access to public transport but also demonstrate how people with a disability, in particular people who use a mobility aid are doubly disadvantaged.

Recommendation:

Include in the Standards a requirement that all entry points of a train are accessible for people using a mobility aid, not just one.

d) What do you currently see as the greatest areas of need with regard to accessibility of public transport for people with disability? Can you provide specific examples?

Access to public transport is a Human Rights issue
Freedom of Movement or the right to travel is a human rights concept noted in the Victorian Charter of Human Rights and Responsibilities. However for many people with a disability access to public transport is neither equitable nor dignified in its provisions. There are approximately 4 million people in Australia who have a disability with a further 2 million people in unpaid caring roles, as well as an ever increasing ageing population. All who rely heavily, if not solely, on public transport to assist them to be active members in their communities.

For people with a disability, public transport is not just about getting from point A to B, more importantly it supports people to be independent, to receive an education, to participate in the workforce, to get to vital appointments relating to their disability, and to lead an active life filled with social activities.

For some people with a disability public transport represents the only option for getting around. Equitable, dignified and safe access to public transport is key to people feeling confident to access the raft of services that are available to the general community. Negative experiences exacerbate fear and vulnerability that can leave a person with a disability with very little choice but to continue using the limited options available to them.

Fulfilling the obligations of the Standards:

The Transport Standards for Accessible Public Transport were enacted in 2002 with the purpose of providing a mechanism for public transport operators and providers to work towards a public transport system that was free from discrimination.

Exemptions in meeting the Standards, from time to time may be necessary. However, the Standards have been developed to provide increased access for people with a disability. Where exemptions are granted without timelines to meet the Standards or any way to monitor progression towards meeting these Standards, it challenges the integrity of the Standards and devalues the human rights of people with a disability.

2) 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?

Full support for a labelling scheme for mobility aids

Recommendation 5 in the Issues Paper outlines the development of a mobility aid labelling scheme. The labelling scheme would provide valuable information to mobility aid users and transport providers. Providing people with the reassurance of knowing their mobility aid is of a size and weight that will comfortably and safely be able to board and fit in an allocated spot. This would also support discrimination complaints enabling the mobility aid user and transport provider to determine whether a mobility aid is compliant with the dimensional limitations outlined.

3) To what extent do you feel that the requirements in the Transport Standards address all of the accessibility requirements for people with a disability? Are there gaps in the coverage of requirements?

The application of the Transport Standards naturally apply to transport infrastructure, e.g. train stations, bus stops and tram stops and the respective operators and providers responsible for managing these modes of transport. However the defined scope of the Standards should not be limited only to transport infrastructure. This results in gaps in the establishment of a continuous accessible path of travel, between different modes of transport and from transport infrastructure out into the community landscape.

For example a platform tram stop may adhere to the Standards but the scope of the standards does not consider the nearest pedestrian crossing which may not be accessible. Another example includes a bus stop and a train station which are both accessible however the path of travel between the two is not. In both instances the Standards have been implemented correctly but there are still access barriers preventing a person with a disability from accessing public transport like any other member of the community.

Recommendation:

1. Broaden the scope of the Standards to cover a continuous accessible path of travel to other transport connections e.g. from a train station to a nearby bus stop. Or reference the role of Local Government and State Government in implementing complementary initiatives beyond the immediate limits of the Transport Standards.
2. Build in capacity for monitoring of the standards and complementary initiatives that are within the newly defined scope of the Standards.

4) Do you find that the current processes with regard to making a complaint or seeking information are sufficient or sufficiently responsive?

Making a complaint against a transport provider can be confusing for customers to know who they should contact given there is a different provider for each different mode of transport. There needs to be consistent information listed on all websites, brochures, and complaints policies referring people to the appropriate contact when making a complaint.

Examples of good practice relating to information provision and complaints processes was found on the Metro and V Line trains websites, this included Public Transport Victoria (PTV) contact information as well as their own contact information. The V Line website in particular clearly explained their customer service charter and complaints process.

The establishment of the Public Transport Ombudsman (PTO) Scheme in 2004 provides independent dispute resolution with regard to complaints received about the Victorian public transport operators who are members of the Public Transport Operators scheme. While the PTO does not provide a consumer advocacy role, advertising the role of the PTO on public transport may go some way in keeping consumers informed of their rights.

Consider the scope for monitoring of the Standards to link into the Public Transport Ombudsman Scheme. There currently seems to be no reference made to the Standards on their website.

Recommendation:

1. That consistent information is listed on all modes of transport and transport provider websites, brochures outlining their contact information, customer service charter and complaint policies and mechanisms, referring people to the appropriate contact when making a complaint.
2. Promoting the role of the Public Transport Ombudsman and its powers in supporting consumers with complaints across the range of modes of transport with specific reference made to the public transport operators who make up its membership (e.g. BusVic, MetroTrains Melbourne, MYKI, Public Transport Victoria, Southern Cross Station, V Line, etc.).

5) As a body representing the views of people with a disability, do you have any specific responses or perspectives with regard to the issues raised in the questions above?

Strengthening the role of Local Government in supporting the Standards for Accessible Public Transport

Section B of the Issues Paper notes the membership from State and Territory Governments. Representation includes the Australian Local Government Association. Local Government can have a stronger role in supporting the implementation and monitoring of the Standards. The Standards make no mention of Local Government reinforcing the lack of clarity or perhaps ambiguity with regard to the role and responsibility of Local Government, if any, in supporting the implementation and adherence to the Standards. With no mention of Local Government it is the onus of each individual Council to decide whether they will take an active role in advocating for and supporting the implementation of the Standards. This can result in inconsistent support, implementation, and adherence of the Standards.

An example involves the upgrade of bus and tram shelters in Darebin. The task is the responsibility of PTV who subcontracts the works to an external provider (Adshell) to be completed on Council land. Darebin Council's Transport

Management and Planning Unit made effort to understand the Standards and follow up the upgrade works of some of Darebin's bus and tram shelters to ensure compliance with the standards. However there is currently no monitoring body in place to ensure compliance with the standards are understood and completed particularly where there is technical knowledge required by external contractors.

There is also no requirement stated in the Standards that articulates definitions and scope of compliance where work is being conducted by external contractors. In this instance Darebin Council was able to alert PTV that the bus and tram shelters were not being installed in accordance with the standards. However there are many examples where the gaps result in the proper implementation of standards being left to chance and non-compliant works being left as is, sometimes for years on end.

In this example Darebin Council were familiar with the Standards, but there is no mandate that requires Councils to understand, support or take a leadership role without direction with regard to the Standards. Other Council's may not have resulting in bus and tram shelters being installed incorrectly and without follow up, being left that way. This relates directly to the dissatisfaction expressed in the issues paper regarding 'uneven improvements in accessibility'.

As noted in the Issues Paper compliance with the Standards is not directly monitored, instead there is a reliance on 'a mutual commitment of industry' and people lodging complaints. Consequently this impacts on the effectiveness of the Standards and allows short cuts to be made without reproach.

We have included two examples of bus and tram shelters in Darebin that were installed incorrectly by the contractor without follow up from PTV. They have since been left in their non-compliant state. Darebin Council has corrected some shelters utilising our own Capital Works budget.

Image 1: An advertising shelter was installed instead of a non-advertising shelter, which is narrower and would have better fit this particular tram stop. Consequently the advertising shelter obstructs access for a person using a mobility aid.



Image 2: This advertising shelter has been installed incorrectly blocking both sides of entry to the shelter by a person using a mobility aid or a person with vision impairment. The Tactile Ground Surface Indicators have also been installed incorrectly. Standards 18.3 state they need to be a contrasting colour.



Recommendation:

1. Reference made to the role and responsibility of Local Government in supporting the implementation and adherence to the Standards.

2. Development of a monitoring framework situated with and enforced by the Commonwealth Department of Infrastructure and Transport.

6) Other key issues you would like to see addressed?

Introduction of Disability Awareness Training for Transport Providers & Employees

In section 1.15 of the (DSAPT) refers to being equally mindful and removing discrimination against people with disabilities other than physical. In support of this statement we would like to suggest that disability awareness training be a requirement for all transport providers and for all employees who have interaction with the general public as customers and passengers, eg. drivers, Protective Service Officers, ticket inspectors, and customer service representatives. Furthermore we would like this to be followed up by regular refresher training.

Incentives for good practice - Disincentives for bad practice

Incentives could be included as a condition in the contract of public transport providers when providing a public transport service within a State or Territory. There could be incentives (nominations for outstanding service by regular customers) and disincentives for providers who do little or do not keep up their training. Disability awareness is integral in supporting people with a disability to have equitable access to services. Training would support all facets of a contracted transport provider to understand not just the physical and environmental barriers for people with a disability but the attitudinal and communication issues that also create barriers for people with a disability in accessing services and their community.

We thank you for the opportunity to be a part of this important discussion in supporting people with a disability to have equitable and dignified access to public transport in Victoria and are available to clarify any points made throughout our submission.

Yours sincerely



**On behalf of Darebin Disability Advisory Committee
Cr Tim Laurence (Chairperson)
Mayor, Darebin City Council**