



The Royal
Society for
the Blind

30 May 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

By email:

DisabilitiesTransportAccessSecretariat@infrastructure.gov.au

Dear Secretariat,

Response to the 2012 Review of the Disability Standards for Accessible Public Transport 2002 (Transport Standards) Issues Paper

The Royal Society for the Blind of South Australia (RSB) welcomes the opportunity to provide a response to the Australian Government review of the above Standard to improve services, facilities and infrastructure to enable people who are blind or vision impaired to travel independently on all forms of public transport.

The RSB, established in 1884, is the primary provider of low vision rehabilitation services to South Australians who are blind or vision impaired and therefore has extensive experience in the specialist needs of people who are vision impaired.

Our Services

Adaptive Technology
Community Education
Counselling
Employment Services
Guide Dog Service
Industrial Services
Library Services
Low Vision Centre
Mobility Services
Outreach Services
Peer Support
Print Alternatives
Recreation & Leisure
Systemic Advocacy

Adelaide

Knapman House
230 Pirie Street
Adelaide SA 5000
GPO Box 1855
Adelaide SA 5001
Office 8232 4777
Donate 1800 644 577
Email mail@rsb.org.au

Corporate Office

254 Angas Street
Adelaide SA 5000
8223 6222

**Industrial & RSB
Guide Dog Services**

11 Blacks Road
Gilles Plains SA 5086
8261 4121

Regional Offices

Mount Gambier
Noarlunga
Port Augusta
Smithfield
Victor Harbor

www.rsb.org.au

The Royal Society for the
Blind of SA Inc.



In submitting this response the RSB would like to draw attention to a number of developments that have occurred since the Standard was legislated.

- Australia became a signatory to the United Nations Charter on the Rights of a Person with a Disability (UNCRPD); and
- The Australian Government has adopted the National Disability Strategy

The impact of both of these complimentary pieces of legislation is that State and Federal Governments, Business and the Community have a greater obligation to remove any barriers that restrict people who are blind or vision impaired from being able to independently access and use public transport and complete an accessible journey from beginning to end.

The RSB believes that one of the greatest barriers to accessibility and inclusion is the continued lack of awareness and willingness on all sectors of the community to take into consideration the needs of people who are blind or vision impaired.

At the current time, many organisations prefer to spend time and money in taking action to continue to deny access to people who are blind or vision impaired rather than embrace the need to make their facilities and services available to all members of the community. Other organisations, including the public sector continue to fail to embrace the need for change and do nothing, thereby denying the rights of people who are blind or vision impaired to become an equal participant in society. Both of these approaches are of course contrary to the governments (both Australian and State) philosophy of all people becoming socially included in all sectors of the community.

For examples of behaviour denying the rights of people with a vision impairment one has only to look at submissions and cases heard by the Human Rights Commission and the Federal Court.

Before commenting further, it must be noted that this is the Second Review of the Disability Standards for Accessible Public Transport since their introduction in 2002. It is therefore very disappointing to have to make some of the comments based on the fact that overseas public transport has been fully accessible for many years. For example in Japan in the year 2000, the public train system had automated maps with direction lights indicating the route and next stop and also audio announcements both in Japanese and English making it a delight for people who are blind or vision impaired. Other countries have similar systems on their forms of public transport and along the routes at the commuter stations.

ELEMENTS OF AN ACCESSIBLE JOURNEY

To assist the following information is provided in relation to the elements of an accessible journey for a person who is blind or vision impaired with reference to how they currently exist in South Australia:

Aviation

The journey for a person who is blind or vision impaired commences at the drop off point at the terminal (whether by taxi, bus or train), this is currently the most stressful part of the journey for RSB clients.

Aviation operators currently take responsibility for a person who is blind or vision impaired from check in to the baggage carousel at the completion of the journey. The Standards are however silent on the assistance provided between check in and the baggage carousel and at the point of baggage collection. Unfortunately airport owners and operators have no responsibility within the Standard nor do they acknowledge any need to accept responsibility to provide any assistance.

People who are blind or vision impaired rely on:

- the general public to assist them after check in to baggage collection; and
- taxi drivers willing to leave their car unattended to assist but who in doing so risk receiving a fine. Bus drivers are also similarly placed in this predicament.

The RSB recommends that this anomaly be resolved within this review.

Examples of how other countries have resolved this issue include:

- Making the Airport Operator responsible for drop off to the cabin door-to pick up point
- Contracting a third party to offer this service to all airlines using airport services.

Other areas in the aviation sector that require review and solutions are:

- the restrictions on the number of dog guides that can travel in the plane cabin at any one time, this occurs mainly with so called budget airlines
- access to information within Airport terminals – accessibility of flight information – placement of VDU's and suitable size fonts and colours on

screens and, audible announcements to inform of pending flight departures etc (avoid silent airports).

It is acknowledged that a number of considerations of the design and fit out of airport terminals is now covered by the Access to Premises Standards however there is still a need for more inclusive/universal design principals to be included at the time of building and renovation of terminals. The Standards must also become obligatory to ensure that the needs of people who are blind or vision impaired are addressed and fully met.

In the case of the current Adelaide Airport, the RSB consulted with Airport management during the design and construction phases and, has continued to do so post completion on access issues confronting persons who are blind or vision impaired. Areas still of concern are access to information, lack of directional wayfinding and colour contrast within the facility.

Taxis

The Taxi industry in South Australia has endeavoured on many occasions to ensure that people who are blind or vision impaired are able to travel independently but ongoing consistency is a serious problem.

Unfortunately despite the RSB participating and providing training to taxi providers and training schools the end result is still a lack of awareness and commitment by drivers to assist.

Areas for improvement

Having considered at length the ongoing difficulties that our clients are experiencing and the lack of preparedness of many to address the situation there is a need for:

- Greater emphasis on driver awareness and stronger penalty measures for non-conformance.
- Resolution to who the contract is made with when booking a taxi, is it the Booking Agent (Yellow Cabs, Suburban or Independent in SA) or the driver. Despite many representations there is no decision as to who is ultimately responsible for :
 - failing to pick up a passenger with a dog guide
 - an individual being dropped at an incorrect destination
 - not offering sighted guide assistance to the passenger (payer of the fare) who is blind or vision impaired to the front door or reception of a business

- the provision of accessible talking meters i.e., talking EFPOS/ payment terminals. An often heard complaint is that a taxi driver has taken a long route or enlarged the fare.

Other issues for consideration and action prior to the next review include:

- Internal accessible signage – the provision of Braille, tactile and audio to identify the car and driver identification.

In South Australia taxis are currently being fitted out with upgraded security systems and GPS location for the protection of both passengers and drivers. This technology should be harnessed to enable a person who is blind or vision impaired to travel independently, safely and with dignity via the taxi system.

Buses

Driver education and practices continue to demonstrate a lack of understanding of the impact of vision loss and the barriers they create to the individual.

The failure to stop and pick up or advise a person who is identified with a vision loss (e.g., the presence of a white cane or dog guide) is of concern. All too often individuals are left standing there and must rely on a fellow traveller, if there is one and they care, to advise them of an oncoming bus and whether or not it will take them to their destination.

The application of multiple ranking at bus stops is a further concern as the buses behind the front one do not stop at the head of the rank before sequentially clearing a bus stop but rather leave from two or three buses back from the bus stop. This is hard enough for the normal consumer but for people who are blind or vision impaired it has no regard to their safety and welfare apart from the operators not affording the opportunity for them to catch the bus they require.

Similarly drivers not advising when the bus arrives at requested stops or not providing assistance when asked demonstrates the problems found in travelling independently. This lack of awareness and training is clear when they reply – just press the button to request the stop which is an often reported response.

Technology that could be used to provide greater independence for people who are blind or vision impaired include for example:

- on board automated announcements of location via GPS and
- route and number information upon arrival at bus stops, external speaker.

Whilst smart phone technology is being developed to provide this information it should not be assumed that all passengers will have a smart phone and, systems rather than personal solutions should be provided.

Information on the bus network is provided through the Web and Phone system which is accessible following the last upgrade - we commend the South Australian Public Transport Service for taking the time to work with the RSB to achieve this goal.

Trains

In South Australia existing rolling stock for the train network has been refurbished over the past 5 years and significant improvements have been made to assist people who are blind or vision impaired. Lighting and décor treatments have assisted RSB clients with some residual vision greatly.

However once again the driver education has failed to remove barriers facing people who are blind or vision impaired passengers with important journey information. Audible announcements on board trains is inconsistent and in many cases incomprehensible (currently a human service). An automated system is preferable.

In South Australia things tend to occur in an uncoordinated way with two government divisions following different specifications. Through the Public Transport Services (PTS) Transport Access Advisory Group the RSB has for many years provided advice and developed guidelines and specification for a refurbishment or creation of train stations - these specifications are designed to create consistency and standard layout to assist people who are blind or vision impaired to independently travel within the train network. However with major projects being completed outside the PTS, Train station infrastructure is currently being created with varying interpretations of the DSAPT. This highlights the need for the DSAPT to be re written to be clearer on the intent and better direct compliance, particularly with the Access to Premises Standard.

Currently the DSAPT does not cater for tactile boarding points on a platform. It is a serious problem for people who are blind or vision impaired to locate the door to board a train or tram in SA and consequently know where they are when leaving the train. The RSB recommends that the DSAPT is amended to include at least one tactile boarding point, with drivers being instructed to align the first door with the tactile boarding point.

Trams

Adelaide has only one tram route, using French and German manufactured rolling stock, unfortunately the physical layout is different on each with one having three doors and the other six.

This decision by Government has resulted in the removal of tactile boarding points on the platform as alignment could not be achieved between the two models - certainly a backward step for access. As a result people who are blind or vision impaired are now reliant on the driver aligning the door with the passenger and using audio instructions via the exterior PA to guide the blind person to the door.

Conclusion

The above comments serve to demonstrate that South Australia and it is believed Australia in general has failed to embrace social inclusion and accessibility for all, something which should not be denied to any individual let alone people who are blind or vision impaired.

The fact that governments and private operators are still not designing, purchasing and providing fully inclusive facilities and services when these have been available for many years overseas is not acceptable.

The RSB therefore believes that the Review must firstly ensure that all recommendations from the 2007 review are implemented as soon as possible and that no amendments are made to the original timelines of achieving an accessible public transport network by 2022.

Instances of running out the compliance for accessible school buses until 2040 are not only disrespectful and discriminatory to people with a disability but deny children with a disability.

Further, the DSAPT has been in the community for 10 years prior to its adoption and 11 years since, therefore the manufacturers, governments and operators have had plenty of time to provide accessible Infrastructure and Services or have a plan to comply with a full compliance date of 2022 - a date that in view of the availability of fully accessible services overseas and ability of all to plan for the future must not be extended. Rather to the contrary it is a date that should be retracted to an earlier time frame where ever possible and this is never more relevant than in the instance of government expenditure on new and replacement public transport stock and infrastructure.

I am available to discuss the needs of people who are blind or vision impaired and can be contacted on 8417 5563.

Yours sincerely

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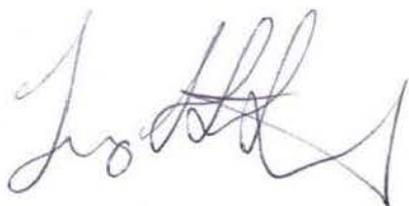
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