

Friday 31 May 2013

Dear Madam/Sir,

Re: Transport Standards

Please find below our submission for the consultation on the Disability Transport Standards.

We appreciate the opportunity to contribute to the consultation process.

Yours sincerely,



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Patron: Her Excellency, Ms Penelope Wensley, AC Governor of Queensland

Transport Accessibility Standards Consultation 2012

- **How has your accessibility to conveyances (e.g. trains, buses and coaches, trams, ferries, wheelchair accessible taxis and aircraft) changed? Can you provide examples?**

Generally it has improved- buses are more accessible; there are more disability-friendly facilities at stations, stops, airports and so on. But while particular facilities have improved there seems to be a lag in the actual take-up of transport by people with disabilities. A recent confidential report for the Queensland government about the proposal to cap the taxi subsidy to people with disability indicated that there has been relatively little increase in public transport take-up since 2007, indeed TSS Category One (wheelchair) membership has increased every year since 2007, other than slight reductions (from 9096 to 8859 in the period from 2010-2011 and to 8676 in 2012).

While accessibility to buses, at least those maintained in large metro fleets, has improved substantially for people in wheelchairs, there still remains a significant number of buses that are not accessible. The Brisbane City Council offers with twenty-four hours' notice the provision of accessible buses on those routes where accessible buses are not typically operated. However, this is still a major inconvenience and disqualification to the sort of impromptu travel that is commonplace for people without disability. It also relegates accessibility well below the level of parity with the non-disabled that is the goal of the CRPD and the Transport Accessibility Standards.

The service offered to people with disability travelling by air is variable. As far as we are aware the major airlines still operate a two wheelchair policy. That is to say, only two people relying on wheelchairs for their mobility will be carried by any aircraft at any given time. This is a shameful situation for any group of wheelchair users wishing to travel together, or indeed, for any wheelchair user wishing to exercise the free choice enjoyed by the non-disabled in selecting a flight that suits their convenience and needs. This is a situation that must change.

The service vision-impaired users experience when travelling by air is variable. Some airlines will provide assistance only from their own information desk inside the airport. They will not assign someone to meet a vision-impaired traveller at the entry to the airport even by pre-arrangement. The service on aircraft particularly with reference to emergency procedures is also variable. On some flights the instruction is provided personally in ways that can be clearly comprehended. On

others the instruction is simply delivered through the mass demonstration given to all travellers, which is singularly unhelpful to the vision-impaired.

- **How has your accessibility to information (e.g., maps, timetables, announcements, etc) changed? Can you provide examples?**

For people with vision impairments access to information is key. Help stations - identified by the repetitive pinging sound - providing recorded information about arrival and departure times are available at some but not at every stop/station. The pinging is not always audible over the noise of the trains. It may be useful for people with vision and other impairments to have a help-station 'hotline' that connects to a real person who can help with directions and scheduling. This could be an added bonus for people who don't have literacy or fluency in reading English.

Announcements- are often either not loud enough, or too loud. They must be made well before the train arrives, or departs, so that the sound is not lost in the noise of the train itself.

Little appears to have changed to make buses more accessible to people with vision impairments. Mounting the bus is not so much the issue in this case as is identifying the bus needed and flagging down that bus when it is in motion. Some type of system is needed at bus stops that can identify for the vision-impaired which bus will be the next to arrive, when the bus you require will arrive and the progress of that bus as it approaches the stop. This could be provided by a fixed installation of the type used at railway stations that announce at the press of a button the arrival time of the next train. The information provided should be expanded however to include bus number and route, rather than simply announcing that the service is inbound or outbound. An alternative may be an App that can be installed on smart phones that gives real-time updates of approaching bus, train or other public-transport traffic.

- **How has your accessibility to infrastructure immediate to boarding a conveyance changed? (e.g., any structure or facility that is used by passengers in conjunction with travelling on a public**

transport service). Can you provide examples?

I-phones come with GPS locator software, text to speech and speech to text and these are useful for interfacing with timetabling information sites. Unfortunately, not all people with vision-impairments have access to (i.e. can afford) these phones.

Many trains are still not accessible to wheelchair users except with the deployment of a ramp put in place by a train guard or station personnel. This deprives wheelchair users of the ability to embark and disembark with free unassisted dignity. It also forces reliance upon the memory of others to assist you from the train. If the guard forgets that a wheelchair user wishes to disembark at a particular stop, then the user is obliged to disembark elsewhere and manage the inconvenience and perhaps risk of returning to their destination either by train or other means.

A substantial number of railway stations are still not fitted with elevators or stair ramps to assist people using wheelchairs to cross railway tracks. This can be a problem for people with other mobility issues, particularly when the steps are steep, narrow and otherwise constructed in ways that makes footing uncomfortable.

- **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?**

Locating signs - One of the great challenges for people with vision impairment is finding the station, stop, and signs themselves in the first place. People with vision impairments may be able to determine the details of a trip online only to get lost when they try to find the access point itself.

A convention for the location of signs and notices may be useful. Knowing that an information point will be to the left of the turnstile, or to the right of the door, at a height of 1.5 m etc no matter what kind of infrastructure it is, will help a lot.

Not all people with vision impairment have braille literacy. Other options need to be explored, with practicality in mind. For example, It's not possible to display all route and timetabling details in a sign, so developing electronic/digital interfaces is the way forward.

Safety for people who use wheel chairs on buses- the brakes on chairs will hold the chair stationary on a gentle slope. At 30 g (for g force- and 30 is not unusual for

an MVA) the brake would be irrelevant, and the force would send the 200 kg chair (and occupant) hurtling through the bus/train/tram like a juggernaut, pulverizing anyone or thing in its path. Chairs should be secured.

This danger is a deterrent to using the PT system. Taxis are costly, and here in Queensland the state government is contemplating the introduction of a cap on the TSS or taxi subsidy. People who use wheelchairs will be caught between a rock and a hard place. Lock down devices for wheelchairs are not just safety devices, they ensure compliance with the *Convention on the Rights of Persons with Disabilities* and the *Disability Discrimination Act 1991*.

- **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?**

Finding the station, stop etc is often a challenge. The standards might include an item concerning vision-impaired accessible pathways. For example:

Braille trails: these are a wonderful innovation, but they act as a congregation magnet. People stop on top of them to conduct conversations. This is an obstruction for people using the trail. Clearly readable signage should be painted on the ground at intervals adjacent to the trails indicating the purpose of the trail. The signage could also carry a warning with a small fine for people who obstruct the trail.

- **Other key issues you would like to see addressed?**

Outdoor spaces - Park and ride facilities

Designated disabled parking bays to be provided on a basis relative to the percentage of people with a disability in the community.

Parking ticket machines and boom gate access mechanisms need to be accessible to all.

Accessible designated parking bays to be available on all multi storey level car parks, with suitable access to the lifts for those who rely on mobility aids.

Information to be available in a variety of formats in lifts, ie the provision of Braille and automated messages.

Allocated wheelchair seating in conveyances must take into consideration the social aspect to this provision - people with a disability should have a right to use transport accompanied by, friends, family or one or more support workers if necessary. Similarly, parents who use a wheelchair may be supervising young children and ought to be able to sit with friends, support workers.

Bus stops: electronic timetable and ETA information may be inaccessible to a blind or vision-impaired person and for other people who are unable to read. An on demand (e.g. button-activated) audible readout would make the electronic board more accessible.

Walk lights: We appreciate the arguments that the needs of residents for quiet at night should be balanced with the needs of people wanting to access the safety of the crossing. However, the safety of crossing users must always trump the mild and transient inconvenience audible crossing indicators create for residents. An acceptable compromise could see existing and new sound indicators replaced with indicators that have low sound triggered by low light or activated at certain times. Another solution may be to include an extra button on indicators that produces a low-noise signal for evening use. Turning off the sound but leaving the tactile pulse indicator is another alternative, but a dangerous one that is probably best avoided. The audible pulse is used not just to indicate when a user may cross but also where they may cross. The audible pulse is a beacon for blind or vision-impaired users that indicates where a crossing is and where the control is to operate the crossing signal.

Accessible Toilets: often do not have an indicator on the inside latch that tells the occupant whether the door is in fact locked- a potential source of embarrassment. Nor as a matter of course do they have full-size change facilities (including a change-table and hoist), nor an accessible shower. QAI recommends that all new public toilets be equipped with these items to facilitate the equal access to public spaces for people with a disability. When retrofitted, existing facilities should also be upgraded to include accessible toilet, change facilities and shower.

Carers: are sometimes subject to full facility costs when working. Carers or workers are exempt from public transport fees if they have a companion card, but the existence of the card may need to be more widely publicised as not everybody knows about them. Support persons should always be admitted free of charge when they are clearly present to support a person with a disability.

Dogs- Access for people with guide dogs is a function of access for the dogs too. Some public water fountains have a small receptacle at the base into which water can run, providing drinking water for dogs. All public drinking amenities should have this facility.

Inaccessibility comes at great cost to people with disability. It means a loss of potential to participate in employment, education, etc.

There should be mandatory reporting and compliance by people who have obligations under the standards, not just reporting by states and territories (though there is no requirement for states and territories to report) as this is the only way to assess compliance.

There should be a regulator of standards as well as incorporation of compliance with standards into licensing of operators. This would remedy the complaint that cost of compliance outweighs benefits of compliance. There are a number of states that have required providers in their contracts to comply with standards – Western Australia, Queensland and Tasmania do this.

Transport regulators should regulate on compliance with accessibility standards the way they do on safety. There should be mechanisms established for ongoing consultation with people with disability. This would allow new and emerging issues such as rails on trains to be addressed.

There should be mandatory training for operators about standards.

There should be an industry-based complaints process. It is better to keep complaints centralised in the one process.

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