

RE: Submission to the Review of the Disability Standards for accessible Public Transport 2012.

February 6, 2014

By Dr David Squirrell

I was made aware of the review of the Disability Standards for Accessible Public Transport through a Government Media Release on Friday July 4 2014 with the closure date being the 14th July 2014. I was not aware of such a process being undertaken. I have contacted several of our Adelaide Branch Blind Citizens Australia members & without failure all stated they were not aware.

I used my adaptive technology hard to navigate the web site dealing with this agenda & found that Guide Dog SANT service & Royal Society for the Blind both tendered submissions but also note they are not always aware of the personalised issues many of their clients face in navigating public transport nor are they the totality of opinions that people with a vision impairment may have.

As a person with vision impairment, early retired medical senior consultant (since 2008) in the rehabilitation & aged care section I believe the need to consider the aging population & vision impairment is vital so as to live up to the rhetoric on access & social inclusion. I have progressed from loss of medical practicing licence, to struggling, loss of drivers licence, introduction of white cane & now a guide dog.

I will attempt to compartmentalise my comments & strategies I have attempted to put in place to resolve issues with various levels of success.

At a Hallett Cove forum on public transport late 2013 which was poorly promoted I raised many concerns & when raised several questions on the issue of public transport & disability issues Premier Wetherall & the then CEO Rod Hooks failed to answer my questions but stated a senior manager named Michelle Spagoletti would approach me after the meeting. I have no issue with her politeness but feel dismayed that few aspects have been resolved & gradually communication failed to bring about any positive outcomes. I even tried the complaints section & found internal inconsistency with responses & felt that my concerns were of low importance & I was left feeling devalued as a person with a disability (Vision & hearing).

Developing a public, private and community transport system that is accessible to the whole community.

Trains

Trains have become a significant facet in my travelling & the absence of a train service in the south due to upgrading & electrification was a major barrier to getting around with a guide dog - especially in temporary often un-air-conditioned buses in summer

I will dot point my concerns

1. Lack of TGSI along platforms which HREOC Graeme Innes informed me was a set standard if I wanted to proceed with a complaint. I was even informed by the complaints desk that SA had an exemption, yet most station platform upgrades have them. Despite Noarlunga being closed for over a year the platforms only have such on the side leading to commuting to Adelaide. Many platforms have poorly maintained or poor contrast TGSI's. These are essential for a cane user to become aware of a risk such as the edge of the platform.
2. Both RSB & GDSA mobility instructors have educated me that I need to stand on the blue disability square so that the driver will stop the train to line me up with the door then hopefully I can locate the opening button as not automatic. Few drivers oblige in this regard & the Complaint desk informed me that they were only for wheelchair / gopher patrons.
3. The SA stations have blue police assistance poles with push button assistance functionality & most are supposed to have yellow train information poles. Oakland platform on the towards Adelaide side has it 20-30 meters along the platform & recessed to the rear of a bench seat making access in finding problematic. The Noarlunga ones are adjacent to black painted girders & almost impossible to locate unless you have awareness of where they are.
4. Lifts often fail to have large clear big bold & high contrast buttons so as to locate the location & which one you may need.
5. Signage as to platforms is problematic as in Noarlunga Station actually has made an error but I was informed at the complaint desk that there is no money available for correction that side of the budget.
6. Signage to locate a station can be problematic as happened with Seaford Station opening when a small print yellow on white street sign was erected.
7. The space between the carriage & platform is still problematic in navigating despite being informed the issue would be corrected with the advent of the electrical trains.
8. Announcements tend to be clearer & more user friendly as a positive.
9. Locating the disability seating provision is often problematic in peak times or which school aged children & disastrous when you have a guide dog who needs to position themselves under a seat for comfort & safety. The days of respect for others needing assistance appears to seldom exist these days.
10. The layout of some stations such as Brighton is problematic when travelling south as to which of the two lanes the train may utilise & makes it a potential problem in missing the trains arrival.
11. Not all stairs have TGSI at the top & bottom with yellow edge markings to assist where some vision remains intact. Last year Minister Fox agreed with my requests over a 6 month period to finally address this at Noarlunga. Hallett Cove Beach still is not compliant.
12. Not all stations have platforms on the anticipated side & unless you have a person informing you it is possible to miss exiting. Guess work of not a valid option to assist vision impaired persons.
13. Adelaide Station has assistant Porters but occasionally they give incorrect advice & you can access the wrong train or their may be two trains occupying the same platform making it problematic as to which is the one you require. This has occurred only to find the destination was Port Adelaide rather than Noarlunga.

Buses

1. Hallett Cove Shopping centre has locations to catch the 682 or 720 so as to reach Sheidow park – despite the same destination the access stops are at different locations. South Link has been communicated with this aspect & no response gained.
2. Locating a seat with a guide dog is often problematic
3. No auditory messages. Minister Fox stated last year that an application was present on Smart phones but not all have such or know how to use. I was informed the application would not be released for android phones.
4. Bus drivers do not always stop when waiting despite a white cane or Guide dog.
5. Bus drivers can be annoyed when they stop & their bus is not the one you need
6. Bus drivers do not always recall & inform information as to where you want to reach before alighting.
7. Shelters are not always available to protect a vision impaired person & a guide dog from the elements.
8. Not all yellow bus posts are labelled as to which bus can be hailed from that stop.
9. Several times I have experienced a bus travelling straight past & not knowing if I have been overlooked or the bus was Not In Service. If you cannot see the bus then how can you flag it down.
10. Mothers with prams or people with shopping strollers often use the disability section leaving the location of a suitable seat with a guide dog very problematic.
11. School travelling times are very problematic in locating a seat as seldom does a person offer you their seat even though they see your predicament. Should you b forced to stand & the bus stop or start suddenly it is problematic as to the location of where to reach for so as to maintain balance.
12. Buses my use the same stop but take off before assessing if a person standing at the stop is actually looking for their bus in particular. This has happened to me several times at Hallett Cove Beach especially when the temporary N4 was also in service.
13. Drivers seldom can advise you where to turn to get to your designation or where the road crossings are once your designation stop is reached.
14. Not all bus interchange areas at shopping centres have zebra crossings – eg Noarlunga shopping Centre, not the interchange) leaving a person with a vision impairment the hazard of attempting to cross a road. I was informed by the Onkaparinga council that for some reason it is not legal to have one there.

Trams

As I don't use I have no comment

Aviation

1. Booking a flight is problematic with flight industry offices often telling me the Guide dog needs to be placed in a luggage kennel which is incorrect.

2. There is often a lengthy delay in gaining access to the actual flight company which is what I have learnt needs to occur so that your Guide dog is allocated a seat with you on the plane.
3. Guide dog toileting areas are problematic as to their location, shelter from the elements, & accessing one once you have been through security. Many grassed areas have been removed for shrubs if you cannot find the allocated location.
4. The use of appropriately placed TGSI's are problematic as to navigating from the lifts to the car park area so as to meet the person picking you up.
5. The lifts lack big bold high contrast buttons to inform you which floor you want – silver buttons on a silver background is problematic.
6. Those who use shore-lining with a white cane are inconvenienced due to the design interface of modern structured architecture of some walls.
7. Not all glass panels have markings as to recognising where they are.
8. Toilets are problematic to find & often involve a lengthy walk.
9. Seating is often located within the straight line you are walking in with no risk TGSI's to alert of the risk.
10. Acoustics is very poor
11. TV displays are not at eye height to attempt to visualise.
12. Gate numbers are often indistinct or placed in locations hard to locate.
13. Gaining assistance without a carer or personal attendant – locating the gate, locating luggage etc – is often very problematic for the vision impaired person.
14. Not all security personnel process you the same way or are happy with how to manage your guide dog.
15. There are no Australian Airport guidelines available as to how people with a vision impairment (Cane / Guide dog) access airports & their facilities.
16. Taxi drivers often drop you off & forget you cannot necessarily find your way to your destination within the airport leaving you to your own devices or another person who offers assistance.

Timetabling

1. Not all phones can access the application as prior mentioned
2. Routes are not always the same on weekends & PH as they are on weekdays.
3. I have already alluded to the yellow information posts at railway stations & their inconsistent location

Taxis

1. I have had several meetings with the taxi council of SA due to member issues (I am current President of Blind Citizens Australia Adelaide Branch) as to problems faced
 - a. Driver behaviour
 - b. Driver language standard re English
 - c. Cost involved despite SATSS assistance
 - d. Problems with some drivers & Guide dogs – need a uniform approach such as hair mats on the floor to prevent hail mess. Some are fearful of dogs. Some drivers see you & appear to just drive on – one day this happened to me three times – they slowed down & then took off again.

- e. Not all have the ability to read Braille identification markers on the vehicles.
- f. The meters need to have an audibility function
- g. With making a complaint it is problematic if you cannot identify the driver or the vehicle unless used & keep a receipt.

Accessible Parking

1. I have been partitioning for over a year with the transport minister, Federal local member, local MP & others as to a consistent approach when a person with vision impairment applies for a disability parking permit. I have argued that there should be two more boxes – Legally Blind & Guide dog.
2. Shopping centres are at the best of times user unfriendly to navigate through car parks as a pedestrian – even worse when dropped off & attempt to head for the shopping centre. Also when you have a Guide dog you need maximal door opening ability to assist your dog in or out & attend to the harness. Several times the car in which I was a passenger had to stop in the traffic lane so as to be able to do this. Regular car park spaces are too narrow.
3. The hot day rule states that when temperatures are in excess of 32 degrees C that the dog is not to walk on exposed pavements or roads so it is imperative to gain close proximity to the entrance of a shop or leave the dog at home or be deprived for using the dog as a mobility aid which appears to be in breach of social inclusion rhetoric.
4. Having appropriate access to the close parking of places such as hospitals is also critical for the person with vision impairment as navigating multi level car parks or locating how to access roads & crossings if you are unfamiliar with the hospital layout is most important.

Complaints

1. The process of registering a complaint is problematic on several fronts
 - a. Who do you contact
 - b. They don't always appear user friendly especially when you cannot always give visual details
 - c. Some give conflicting comments to similar issues
 - d. Feedback in a timely manner is often lacking if at all
 - e. Some refer you to a bus company rather than deal with your problem
2. There needs to be some standardisation of process with is transparent & gives timely solutions & resolution.

Final comments

Standards are important but they also need to be followed & modifications made when changes occur to them. I get very distressed when I am told that they have to be 80% complaint by 2020 with the disability Act – this fails to help me now & gives no guarantee that my problem will be addressed not when. At times it appears that

complaining in an objective manner leads to little change & the only option available is to formally lodge a complaint with the HREOC.

I fail to understand why the request for responses & submissions was not sent to the Adelaide branch of the Blind citizens Australia so we could have widely advertised & discussed with our members. How was this promoted & what database did you use to disseminate, I am on the disability register but still did not gain knowledge via this pathway. One can be cynical as to if our opinions are actually wanted & taken seriously.

Will there be an over-riding body responsible for overseeing the Standards, their implementation, changes when required, & making the standards more freely available to access to become knowledgeable.

Please feel free to contact me if you need further information or clarity.

Yours sincerely,

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Committee member

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