



National Ethnic Disability Alliance

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Review of the Disability Standards for Accessible Public Transport
The Allen Consulting Group
GPO Box 418
Canberra ACT 2601

NEDA Comments on Draft Report of Review of *Disability Standards for Accessible Public Transport 2002 (the Transport Standards)*.

Dear Madam / Sir

The National Ethnic Disability Alliance (NEDA) is the national peak organisation representing the rights and interests of people from non-English speaking background (NESB) with disability, their families and carers throughout Australia. NEDA is funded by the Commonwealth Department of Families, Community Services and Indigenous Affairs (FACSA) to provide policy advice to the Australian Government and other agencies on national issues affecting people from NESB with disability, their families and carers.

I write to provide information to the draft report of the review of the *Disability Standards for Accessible Public Transport 2002 (the Transport Standards)*.

I wish to provide the following comments in relation to this report:

1. NEDA is broadly supportive of the draft recommendations of the review, and believes that if implemented they will improve the effectiveness of the *Disability Standards for Accessible Transport*.
2. NEDA emphasizes that inconsistencies in signage and displays, complexity of information on how to use public transport and timetabling, the poor availability of standard information in community languages, and unclear procedures in the event of service change or disruption, will compromise the ability of people from NESB with disability to access safe and reliable services. For example, complex ticketing systems that rely on strong English language proficiency will be disadvantageous to many people from NESB with disability. Similarly, in many jurisdictions people from NESB with disability will be discouraged from providing feedback about poor service because the complaints mechanism relies on an English proficiency. Improved

cultural competence of transport information and complaints mechanism provision has a bearing on Draft Recommendations 1, 7 and 8.

3. NEDA also emphasizes that there is work to be done in improving best practice in relation to the use of transit police. As stated in NEDA submission to the Review, in most Australian jurisdictions there has been an increased use of transit police to regulate both fare evasion and passenger behavior. There are community concerns of bias in some jurisdictions, with implications for people from NESB with disability who use public transport services: for example a report by the NSW Homeless Persons Legal Service found that “homeless people, people with disabilities, young people, Indigenous people, recent refugees and migrants appear to be easy targets for public transport fines.”¹ If transit police continue to be a feature of revenue protection and behavior management for Australian public transport operators, NEDA would strongly advocate for appropriate training for enforcement to ensure that people from NESB with disability (and other groups) are not unfairly targeted. Draft recommendation 4 would appear to create an opportunity for best practice reform in this area through information provision.

I trust that the above information and will be taken into consideration in the review of the Disability Standards for Public Transport. For further information on this submission, please contact Dinesh Wadiwel on 9687 8933 or email office@neda.org.au.

Yours sincerely



Dinesh Wadiwel
Executive Officer

¹ Homeless Persons Legal Service / Public Interest Advocacy Centre, *Not Such a Fine Thing! Options for Reform of the Management of Fines Matters in NSW*, April 2006, p1. See also Law and Justice Foundation of New South Wales, *No Home, No Justice? The Legal Needs of Homeless People in NSW*, July 2005, pp105-8.