



28 March 2008

Ms Sharon Kennard  
Project Officer  
Allen Consulting Group  
GPO Box 418  
Canberra ACT 2601

Dear Ms. Kennard

**SUBMISSION BY VICTORIAN LOCAL GOVERNMENT DISABILITY PLANNERS' NETWORK TO THE REVIEW OF THE DISABILITY STANDARDS FOR ACCESSIBLE PUBLIC TRANSPORT**

The Victorian Local Government Disability Planners' Network (VLGDPN) is pleased to make a submission to this important review. The VLGDPN is an active organization where Local Government personnel involved in Disability planning meet and cooperatively work together in improving access for people with disabilities across Victoria. The VLGDPN works closely with the Municipal Association of Victoria, and over the past ten years has gained a strong reputation and expertise in the planning of, and advocating for, quality disability services.

The VLGDPN is in a unique position in submitting a response to this review. Local Government Officers across Victoria involved in disability planning regularly work with a range of disability support groups and individuals in improving access to services and infrastructure. In particular, the Disability Advisory Committees coordinated by many Local Government Authorities regularly advocate for improved accessible public transport.

The VLGDPN will not be commenting on all aspects of the Draft Report but will focus on those issues which community groups and individuals have brought to the attention of our members. Also the VLGDPN will be stepping outside the terms of reference in recommending actions regarding the cost of public transport as this has significant impact on the capacity of people with disabilities to access public transport.

The broad areas our submission will cover are:

- **Signage/Communication on Public Transport**
- **Infrastructure/Coordination Issues**
- **Country Residents Travelling by Train to Capital Cities/Provincial Centres**
- **Personal Assistance on Public Transport**
- **Community Transport**
- **School Bus Services in Rural Areas**
- **Wheelchair Accessible Taxis ( WATs)**
- **Access Training for Public Transport Staff/Community Education Program**
- **Consistent National Reporting on Standards Implementation**
- **Cost of Public Transport**

Please contact Peter Whelan, a member of the VLGDPN who coordinated our group's submission to this review, with any questions. Peter can be contacted on 9243 8812 at Moonee Valley City Council or email on [pwhelan@mvcc.vic.gov.au](mailto:pwhelan@mvcc.vic.gov.au)

Yours sincerely

Eilis Hughes

**Chair, Victorian Local Government Disability Planners' Network**

**Signage/Communication on Public Transport**

The VLGDPN considers the needs of people with a sensory impairment have not received appropriate recognition under the current standards, particularly in the area of access to information.

The VLGDPN recommends that:

- Signage and communication for public transport should always include a clear visual display of all public service announcements such as cancellations and time tables. Emergency announcements such as evacuations need to have visual displays in all public areas including toilets, lounges, and food outlets.
- The small print size of timetables and other customer service information on public transport infrastructure and in conveyances and at bus stations must be addressed for people with vision impairment and low vision.
- Audio information systems have been introduced in some systems in recognition of the need to provide information for travelers with vision impairment and the revised APTS must mandate the audio provision of all information other than maps.
- Necessary information must be accessible. Currently the APTS does not mandate the provision of information in alternative formats. This situation is clearly discriminatory and at conflict with the objectives of the DDA.

The Standard currently does not require the provision of Braille and raised tactile signage, a serious omission

Refer to Part 17.6 which states:

- (1) “if a sign incorporates raised lettering or symbols” and in
- (2) “if an operator or provider supplements a notice with Braille characters, they must be placed to the left of the raised characters.”

The provision of raised Tactile and Braille signage is therefore not mandated by the Standard with the choice of whether to provide Raised Tactile and Braille signage to be made by the operator.

Raised Tactile and Braille is essential for all wayfinding and service access information in public transport infrastructure and conveyances.

Braille is not “supplementary” signage. It is an “alternative format” for signage. For a blind person who reads Braille, it is simply signage.

The Standard should also simply refer to the specification provided by the Building Code of Australia as D3.6 for Raised Tactile and Braille signage. The requirement for Braille to be located to the left of the raised tactile characters is incompatible with all RTB signage used in this country.

- Bus and tram numbers must be placed on the vehicle and be colour contrasted for people who do not have the vision to see numbers on the top of the conveyance.
- Consideration needs to be given to bus numbers being put on the sides of buses. This will assist older residents with mobility issues and people with intellectual disabilities who are taught to travel alone. Travel aide teachers employed in Special Schools have identified this as a simple but very effective measure which would assist their students.
- Maribyrnong City Council in Melbourne and disability services in that municipality have developed a set of communication cards to assist communication between taxi drivers and passengers with communication difficulties. The Victorian Taxi Directorate has trialed these tools. Consideration could be given for this innovative program to be extended nationally.
- The travel needs of people with intellectual disabilities needs to be the focus of a separate review. The VLGDPN has noted the transport needs of this group are not addressed by the current standards. Day training centres, special schools, community residential units, and Victorian Advocacy League for Individuals with Disability (VALID) would prove invaluable resources in any such review.

### **Infrastructure/Coordination Issues**

- Public Transport operators can achieve compliance with the Standards, however depending on the coordination between operators especially in interface Councils, such as Whittlesea in northern Melbourne, people with a disability can still be transport disadvantaged. Train and/or tram services stop on the outskirts of Melbourne at the termination of their route, buses which may not be access compliant or expensive taxis may be the only available form of transport to the resident for the next part of their journey. Also buses and taxis are not always available.
- The closure of toilets at many train stations has created significant difficulties for people with disabilities and older residents. A review of this policy is urgently needed. The VLGDPN is aware of the safety and maintenance issues in the maintenance of such facilities. However, the dramatic closure of so many toilets at train stations in the mid 90s in Victoria should now be reviewed.
- Any short term solution to utilize older style railway carriages to address overcrowding on suburban train lines must ensure such infrastructure is fully compliant with accessible Public Transport Standards. Carriages recently introduced in Victoria for this purpose are non compliant.
- The introduction of low floor buses and the installation of accessible bus stops needs to be expedited as a matter of urgency. In the interim bus time tables need to indicate if a bus has low level accessibility.

- The installation of lifts at railway station to replace ramps needs to be given greater priority as many ramps create a barrier due to their length and gradient.
- In Western Australia one designated part of the train platform has been raised to allow users of motor scooters/wheelchairs and people who find it difficult to lift their feet on to the train to access the train independently. In Victoria, the train driver pulls out a ramp near the front of the train. Many users of scooters and wheelchairs have questioned the effectiveness of this method.
- Consideration needs to be given to the introduction across Australia of the Western Australian model of a permanent ramp access from the platform on to the train.
- Following a spate of fatal accidents at rail crossings by people using wheelchairs in Victoria, a program of upgrades to level crossings has begun. This program should be proceeded with as a priority and the favoured rail crossing design should be included as standard practice in any revised Transport Standard.
- Grade separations for pedestrians should be standard practice in major infrastructure upgrades such as the third rail proposal on the Dandenong railway line in South-East Melbourne. Grade separation should be identified as standard practice on all level crossings throughout Australia.
- The Standards should consider the need for new accessible infrastructure to be introduced in a coordinated manner. In Melbourne, 'super' style accessible tram stops are being installed, yet older style trams which still have steps are being used on these routes. Second, consideration needs to be given to the development of guidelines for the location of accessible bus stop upgrades to cater for low floor buses. A ranking system giving priority to hospitals, community, senior, and shopping centres, and those locations where older and residents with a disability regularly frequent should be developed as part of the Standards, instead of relying on an ad hoc, opportunistic approach.

### **Country Residents Traveling by Train to Capital Cities/Large Provincial Centres.**

- Many country residents with a disability in Victoria travel to Melbourne by train for hospital/medical appointments. The provision of, and the transportation of specialist equipment and/seating/space especially for people using motorized scooters needs to be considered and planned for by V Line Country Services.
- More research is required as wheelchairs/motorized scooters are made to individual specifications before 'across the board' recommendations are made regarding mobility aid and sizing guidelines.

- There have been recent examples of people being separated from their purpose-built wheelchair and/or equipment. Mobility aids will need to comply with Transport guidelines (VLine 1300mm x 800mm), however many people have specific purpose built wheelchair constructed for individual needs. Transport authorities could work in partnership with occupational therapists and manufacturers of wheelchairs/motorized scooters to implement a consistent labeling system that indicates whether a wheelchair or scooter is an appropriate size for travel on public transport. People with disabilities could then make an informed choice about whether a mobility aid will suit their travel needs when purchasing the aid.
- V Line in Victoria is aiming for a 55% compliance rate with access standards by 2012. This needs to be expedited. All State Government rail authorities need to be cognizant of, and actively promote that they can provide additional or specialist services for people with a disability. This service does not seem to be well known.

### **Personal Assistance on Public Transport**

The Standards require that transport operator staff provide direct assistance to people with a disability. However there is a lack of clarity as to what is the minimum acceptable level of direct assistance. What are the features of a quality assistance service? What standards does a person refer to in order to substantiate a complaint of poor service?

The VLGDPN recommends that:

- Modal-specific service standards be developed in consultation with people with a disability and their representative organizations
- In light of the partial compliance with the Standards, operators be required to increase staffing levels to deliver more direct assistance to people with a disability

### **Community Transport**

- Local Government and a range of community organizations have played a significant role in developing and managing community transport services. These services have assisted individuals and groups with a disability to access services and places. There have been many documented studies of 'Best Practice' in Community Transport.
- The State, Commonwealth and Territory Governments need to recognize Community Transport as an equal partner in the provision of accessible transport. The review does not give adequate standing to Community Transport, its current importance and the role it can play in the planning and effective provision of flexible transport options.

### **School Bus Services in rural areas**

- Disability Planners in rural Victoria have identified the potential for school bus services to significantly assist people with disabilities with their transport needs. The VLGDPN strongly supports removal of the compliance exemption for school buses.
- Children with disabilities in rural areas require bus transport to the nearest appropriate school and not the nearest school. Hearing impaired/deaf children have been bussed to the nearest mainstream local school but not to the local deaf school further away.
- Consideration needs to be given to an accelerated roll out across rural Australia and interface Councils of low floor buses. Bus stops at community centres, halls, shopping centres, medical centres, and other areas where older residents and people with a disability frequent need to be prioritized.

### **Wheelchair accessible taxis ( WATs)**

- The VLGDPN is pleased to see the increase in the number of WATs, however for many residents with a disability it is questionable if the quality of service delivery has significantly improved. It has been alleged in newspaper articles and by disability advocacy groups that many WATs are not being used for the principal purpose of transporting people with a disability, but instead are focusing on lucrative fares at Melbourne Airport, and large events like the Grand Prix.
- The VLGDPN understands only Queensland is meeting the Standard's performance/compliance requirements. Over the past 10 years Queensland has increased the number of accessible taxis and has marketed them as multi-purpose taxis. In Queensland there are now more accessible taxis at both peak and off peak times. A study of the Queensland model identifying best practice would assist other states.
- This review needs to critically examine this issue as the Victorian Government has lauded the increase in WATs as a significant achievement in improving access. Strong decisive action will need to be recommended to all State Governments to significantly improve the WAT Program.

### **Disability Awareness Training for Public Transport Staff /Community Education Program of the Standards**

With the exception of the taxi industry in Victoria which has compulsory training for its Wheelchair Accessible Taxi drivers (this training is not always effective as some drivers do take short cuts when using the wheelchair restraint systems) the VLGDPN is not aware of any authority that has introduced a comprehensive and universal training program for staff in the transport industry. The lack of provision of quality direct assistance is evidence of the lack of training.

Awareness of the Standards by people with a disability and individual transport provider staff members does not seem particularly high. State and Territory Governments have not taken on the role of conducting an effective public awareness campaign to inform people with a disability of their rights under the Standards.

The VLGDPN recommends that:

- All jurisdictions develop broad public education campaigns that outline the rights of people with a disability and what they can do when their rights have been breached
- Transport providers work with people with disabilities to develop training packages for staff across Australia.

### **Consistent National Reporting on Standards Implementation**

Information provided to the VLGDPN by the Australian Federation of Disability Organizations has highlighted a lack of common reporting framework which makes comparisons on progress difficult between States and Territories. Consistent and comprehensive reporting is further complicated in those States and Territories which have privatized parts of their transport system.

The VLGDPN recommends that:

- Governments, HREOC, the public and private and private transport industry and people with a disability and their representative organizations develop a consistent approach for reporting. The standard report should include qualitative and quantitative data and have an agreed reporting period and be presented in accessible formats.

### **Cost of Public Transport**

Cost is a major barrier to accessing public transport for many people. Many people with disabilities are on low incomes and/or are recipients of pensions/benefits. Country and interface Council residents with a disability face even greater transport disadvantage due to cost. The VLGDPN recommends a review of the cost of country transport.

- The Sunday Saver fare in Victoria could be extended to Saturday and a trial for one-two week days be considered.
- At present all seniors in Victoria, irrespective of income receive one free country trip per year on public transport. The VLGDPN recommends for people on pensions or the New Start Benefit they have access up to four free trips per year. This recommendation is in line with the principles of the State Government's Fairer Victoria and the recently announced Social Inclusion Agenda of the Federal Government.