

Disability Standards for Accessible Public Transport

Submission

Opening Statement

Whilst RSB believes that all people with a disability should have independent access to all forms of public transport. Our submission and associated comments relate however to access issues in the Transport Standards as they apply to the blind and vision impaired sector of this group.

TGSI clauses 18.1, 18.2

Draft recommendations:

- Remove Clause 18.1
- Remove Clause 18.2

RSB Response

Clauses 18.1, 18.2 should be retained as per current Disability Standards For Accessible Public Transport.

Where entry and exit points are on the same level tactile ground surface indicators (TGSI) would not be required. However if there are stairwells and access to another level TGSI would be required.

To clarify:

- Busses – TGSI not required internally unless double decker busses
- Ferry - TGSI not required internally unless double decker ferry
- Train - TGSI not required internally unless double decker train
- Aircraft - TGSI not required internally unless double decker aircraft.

Exit sign clause 19.1 (2)

Draft recommendations:

- Remove clause 19.1 (2)

RSB Response

Concern if clause 19.1(2) removed and no provision made for persons with a vision impairment in emergency situations. Unclear what the proposed alternative provision for the vision impaired will encompass.

Questions for All Stakeholders

1. Has the accessibility of public transport improved since the introduction of the Transport Standards?

- Standards have reduced potential for injury, including audible door closing alarms & stop announcements on train and trams when not available by human voice. Automated station announcements would be ideal for blind and vision impaired persons. High contrast stanchions and hand grips on busses are highly beneficial.

- Visual presentation of information still an issue. Aircraft do not consistently have alternative print formats such as Braille and large print emergency instructions.

2. Have these changes matched your expectations of the implementation and uptake of the Transport Standards?

- Slow implementation of standards
- Impression is that some operators focus more on ways to avoid complying rather than complying.

3. Do you consider that the level of compliance required at the end of the first five year period is sufficient to have had an impact on accessibility?

- RSB considers the level of compliance satisfactory

4. To what extent do you consider current data on accessibility are reliable? Can you provide examples of problems with data that you are aware of?

- Current data not reliable as not all persons with disabilities are represented in data i.e. invisible disabilities.

5. How could reporting of accessibility data be improved for future stages of the implementation of the Transport Standards?

- RSB feels that the conducting of quantitative and qualitative surveys would provide valuable data to help improve future stages on implementation of the transport standards.

6. Are you aware of examples where improved accessibility of public transport has led to increased patronage?

- Not aware

13. Are there areas of the Transport Standards that you consider unclear in terms of the adjustments operators and providers need to make? Please specify.

- Not aware

14. Have the exemptions allowed under the Transport Standards (as specified in the previous chapter), reduced the clarity of obligations under the Transport Standards?

- Not aware

15. To what extent do the Transport Standards allow operators and providers a choice of ways in which they can demonstrate compliance?

- Not aware of operator choices.

16. Where Australian Standards or other technical requirements are specified, are these appropriate? Please provide examples where you believe the use of Australian Standards is not appropriate.

- Specifications not appropriate as the Disability Standards for Accessible Public Transport do not keep up to date with current

Australian standards. I.e. if standards change then these should comply with the current standard in the act. Example includes the upgrade to the Paradise Bus Interchange (Adelaide) which refers to older 1992 standards as part of the upgrade.

17. Are there requirements that have proven to be impractical or difficult to implement? If so, please specify.

- No comment

18. As a public transport user, are there areas of the Transport Standards where you consider that a more specific requirement for compliance would improve accessibility?

- No comment

19. Do you consider that the requirements in the Transport Standards have been applied consistently across different modes of public transport?

- No – train & aircraft lag behind compliance. Adelaide bus fleet is however ahead of the timetable for implementation of standards for public transport

20. Will any current areas of inconsistency be addressed through the future stages of implementation of the Transport Standards? (see Appendix B)

- Timetable should cater for most inconsistency issues.

21. Do you consider that the current exemptions granted are appropriate? Should these exemptions be reduced over time?

- Not aware of any issues with exemptions

22. In implementation of the Transport Standards, have the requirements led to a relatively consistent standard of compliance across all modes of public transport? If not, where are the major differences in approach?

- Standards not applied consistently across all modes of public transport, especially aircraft and trains.

23. To what extent do the requirements in the Transport Standards address all of the accessibility requirements for people with disability? Are there gaps in the coverage of requirements?

- Information systems for blind and VI persons still require monitoring eg ticket systems.

24. Does the compliance timetable provide for a gradual improvement of accessibility over the 30 year implementation period? Are there aspects of this timetable that present compatibility problems? How could these requirements be improved?

- Satisfied with timetable but would like Australian standards specified to be updated during timetable period.

25. Are providers meeting their obligations across all aspects of accessibility, which ensures compatibility?

- Providers are not consistently meeting their obligations across all modes of public transport, especially aircraft and trains.

27. How well are the current arrangements for making complaints about accessibility understood by the public?

- The disability sector understands the process for making complaints, however the Industry has not promoted to other sectors of the community.

28. Are the current processes sufficiently responsive to complaints, or requests for information or advice on the Transport Standards?

- Most operators responsive, but use exemptions in timelines to delay implementation of changes required.