**Submission**Third Review of the Disability Standards for Transport 2018

Submission from People with Disabilities WA.

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**People With Disabilities WA (PWdWA)**

Since 1981 PWdWA has been the peak disability consumer organisation representing the rights, needs, and equity of all Western Australians with a physical, intellectual, neurological, psychosocial, or sensory disability via individual and systemic advocacy. We provide access to information, and independent individual and systemic advocacy with a focus on those who are most vulnerable. PWdWA is run by and for people with disabilities and aims to empower the voices of all people with disabilities in Western Australia.

This submission is a response to the issues paper on the Third Review of the Disability Standards for Accessible Public Transport 2002 (Transport Standards) released on 17 December 2017**.**

**Section C - Questions for people with a disability, their representative organisations and the community generally.**

People with Disabilities (WA) conducted a survey and focus group in 2014, and again in 2018, to gain feedback on the accessibility of transport. The 2018 survey had 75 respondents, and the focus group 35 participants. This submission incorporates this feedback.

**1. Has your accessibility to public transport improved since the commencement of the second Transport Standards review in 2012?**

Some of the changes that have been implemented which benefit people with disability since 2014 (when we conducted our first survey) include:

* Kenwick station upgrade
* Accessibility bulletins / email AlertMe system
* New Perth busport, designed with extensive consultation with people with disability
* New road coaches with wheelchair lift and space with tie downs (9)
* ‘Get on Board’ inclusive program http://getonboard.transperth.wa.gov.au/Parents/Special-Assistance
* Accessibility maps of all Department of Transport offices
* Informational brochures and materials updated for people with disability
* Transperth assist app and Auslan video ‘Sit Stand Go’
* Priority seating in railcars updated
* Perth station hearing loops
* Upgrade to Mends St and Elizabeth Quay jetties
* Audit of all lifts, with two lifts operating independently in new/upgraded stations
* Bus stop accessibility works program

Improvements that are above the standard have been driven by involvement of people with disability at the design stage of infrastructure and services, and from direct feedback to the Public Transport Authority from disability advocacy groups.

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

The 2018 survey showed that respondents were now using buses more than trains, which may be a result of the introduction of the accessible bus fleets, improved access and supports, and the NDIS rollout.

**Trains**: 55% of respondents were satisfied entering and exiting the trains (77% used the trains) and 14% were dissatisfied. 10 comments were made about the station platforms not being level - specifically at Mt Lawley, Cottesloe, Perth and Guildford. There were also concerns raised about there not being staff on trains or at stations who can assist unless a booking is made an hour prior. This aspect of the train accessibility has not changed and leads some people to not use public transport.

“Train isn’t level with platform, meaning my wheels get stuck and I can’t get off. I have been stuck in the doorway with a crowd of people behind me getting angrier as I can’t move. This is why I now avoid trains. Often people in the wheelchair spaces won’t move.”

“I have to ring for attendant to bring ramps, 2018 now?”

Security and personal safety was discussed relating to train travel.

“I have been abused on the trains and feel unsafe. More guards are required in each rail car."

Positive comments that showed change had occurred included:

“I just came back from a holiday in Melbourne. WA metro trains are about 100 times better than there for wheelchair accessibility! And our stations are nicer too. I love my Smart Rider as well”

“Train and bus services are efficient and well run, the process of informing us of any interruptions to service is also very affective.”

“As a blind person I find train travel more accessible than bus travel”

**Bus**: 61% used Transperth buses. 44% were satisfied with entering/exiting (21% dissatisfied) and 45% with the bus stop (24% dissatisfied). This indicated improvement on our 2014 survey. Assistance from staff, generally the bus driver, scored the highest level of dissatisfaction for bus travel (28%) but has improved when compared to 41% dissatisfied in 2014.

“There is no assistance on any part of the journey. Assistance on & off the bus & locating toilets etc would be nice.”

“Ramps to bus very dangerous, unable to get up ramps in manual wheelchair, always require help either from strangers or bus driver which results in feeling embarrassed and uncomfortable”

Similarly, access to information was rated at 28% satisfaction down from 36% in 2014.

Safety issues attracted the highest number of comment feedback, relating to aggressive passengers, falling risk and crossing roads. Difficulties entering and exiting the bus related to the ramps being steep and lack of assistance from drivers.

“It can be scary being in a wheelchair and the drivers doing sharp stops and turns without being mindful - we can really move across the bus and I've fallen out before and hit the ground hard.”

“Many stations have people crossing where buses stop being deaf blind I find this dangerous and have to recruit a stranger to assist the crossing. My stick often gets caught, unfortunately unavoidable.”

**Ferry**: 55% were satisfied with ferry entering and exiting, and 15% dissatisfied. These results were similar to the 2014 survey. Rottnest ferry was reported to have steep ramp at Hillarys, and the cruises lacked accessible toilets.

**Planes**: No change reported regarding any improvements but issues raised about policy regarding extra luggage, assistance at airports, and toilet access.

“Luggage restrictions on aeroplanes both quantity and type (Flying to USA has no luggage restrictions due to government regulations) - only applies to wheelchair/disability.”

“Taxi drivers at Perth Airport are not allowed to leave taxi to help passengers with luggage”

"If planes are being built bigger and jumbo sized, why can’t aeroplanes accommodate bigger toilets in economy class for the disabled with handrails, etc?"

**b. How has your accessibility to information (for example, maps, timetables, announcements) changed? Can you provide examples?**

There has been increased accessible information through Apps and accessible maps which makes it easier to plan ahead, however the on the spot information such as announcements are still difficult and there is an expectation that everyone will have access to a smart phone, which is not correct.

53% of those surveyed were satisfied with access to train information (14% dissatisfied).

Comments in our survey around the trains related primarily to announcements/ signage (11 comments). Announcements were too quick, difficult to hear or understand, and signs too small and not well lit.

“Signs are too small, Station announcements are often unintelligible”

“I am unable to hear the door closing. I need to look at the light flashing on the sides to be aware of knowing the door is closing. …I find the announcements is dissatisfied because deaf people have not a clue what they were saying. …hardly signs shown anywhere inside and outside especially in the night time where is so dark I cannot see the names of the stations whereas other people hear where they are.”

Buses were reported to have non-existent audible announcements on all general metro bus services, although the CAT buses do have announcements. 45% were satisfied with access to bus information (24% dissatisfied).

“Audible announcements are almost non-existent, & certainly not frequent enough.”

“Some buses in Canberra have a screen showing next bus stops etc, also announced. Would it be possible to have screens here too, linked to app, for blind and deaf people?”

12% reported dissatisfaction with the information relating to ferries.

**c. How has your accessibility to infrastructure immediate to boarding a conveyance changed? (for example, any structure or facility that is used by passengers in conjunction with travelling on a public transport service). Can you provide examples?**

Train stations had a 16% dissatisfaction in physical access, which was a slight improvement from 2014. There were still significant issues with a few stations around access to the station and at the station such as lift breakdowns, lack of ramps, and gaps on the platform, as well as seats being available on the platform.

“Access to Cottesloe Station is dangerous, risk and hazard! Access with my electric wheelchair too dangerous! Risk & Hazard. Dig line out and lower, replace line so bottom of train doors level to platform”

“No ramp at Aubin Grove in case lift is broken. Ramp & overpass at Cockburn on east side is not undercover”

“Ramps length, distances to push, not always good curb ramps from car parks. Really only works if you use a motorised/electric chair”

“Some stations do not have crosswalks or pedestrian crossing lights when exiting in the station perimeter”

“There is not enough seats at stations and I need to sit down due to my disabilities. Some ‘disabled seating at stations would be good.”

Bus stops had a 24% dissatisfaction rating which had not changed from the 2014 response (22%). The height and placement of the stop and the lack of connecting footpaths and shelters were the bigget issues raised.

“Mandurah buses/ Rockingham buses. Disabled friendly stop not attached to a footpath.”

“The bus stops are sometimes located in dangerous places and blocked by cars.”

“A LOT of bus stops don't have shelters or Adequate proper shelters (if it's raining you get all wet/seat is wet you can't sit down/summer the metal seat is too hot you can't sit).”

“Some bus stops still hard to get to - either curb or lip elevations; or have to cross a busy street as no safe crossings nearby.”

Only 5% were dissatisfied with the ferry stop. These results were similar to the 2014 survey.

**d. 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?**

Issues raised in our 2018 survey indicate the primary areas of need now related to:

* Signage and announcements for sight and hearing impaired
* Safety from other passengers/ lack of security and staff
* Lack of assistance (buses and trains – particularly assistance with having ramps and driver assisting)
* Train stations not level with platforms (and the need to call at least 1 hour in advance to get a ramp)
* Safety from falling while on public transport (buses and trains)
* Steep ramps (buses)
* Unavailability of services in rural and regional areas, and even metro areas

**2. 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?**

Our responses show there needs to be greater and more specific compliance in the areas of announcements, information in multiple formats and signage. Given the issues raised about the gap between platform and train we believe there must be alternatives such as the driver having a ramp to assist passengers until technology or engineering provides a no gap solution. More specific compliance on bust stops, seating, footpath and pedestrian access would also assist in moving to a better access on continuous paths of travel.

The recommendations arising from our 2018 Forum held included:

* Training staff on how and when to approach a person with disability; different types of disability needs; mobility aids/assistance animals and travel; consideration with replacement services; safety and comfort across long distances
* Mandateing staff to provide assistance and having ramps on trains for use by drivers
* Raising public awareness of people with disability as priority passengers
* Continuing to work with people with disability to provide accessible information about gaining assistance and providing feedback
* Announcements and signage in alternative formats
* Real time locators and other technology be introduced
* Safety procedures to consider disability
* Review timetabling so connection’s can be met and improve frequency
* Train station audits for accessibility and upgrades
* Bus ramp and bus stop audit and upgrade
* Ferry access audit

**3. To what extent do you feel that the requirements in the Transport Standards address all of the accessibility requirements for people with disability? Are there gaps in the coverage of requirements?**

The majority of issues appear to be in the roll out of the services, in ensuring those involved in upgrading or commissioning the facilities engage the appropriate expertise; and that the staff interfacing with the public are given training and information regarding disability. Although particular groups such as deaf people and people with intellectual disability, and invisible physical disability do not seem to be a priority when implementing the access standards.

There are also still gaps in coverage when looking at connection to and from transport with issues raised regarding pedestrian crossing safety, footpaths and curb ramps.

**4. Have new ways of providing public transport, such as ride sharing or on-demand bus services affected your ability to access services?**

We gained a large volume of feedback on the use of taxis and ride sharing. The feedback relating to taxi and ride sharing mostly related to expense, which would naturally encourage people to to then consider public transport. The use of ride sharing/taxis was presented as an alternative to trains/buses/ferries. All the issues listed above (safety, accessibility, access to information, timetabling) force many people with disability to prefer taxis and ride sharing but how these services interface/interrelate was not discussed fully. Some comments included:

“I am trying to learn how to take public transport by myself, though I find it very scary. On the odd occasion when the venue is too far to go or too far for me to prevail on the good nature of my ex-husband, I take a taxi, though I find that rather confronting”

“Only one accessible taxi in our area.”

“Uber is cheaper but not as safe as taxis. We have to keep transport in NDIS Personal funding… I used to work 4 days a fortnight and now have had to drop a day of ADE work a fortnight because it costs me over $70 in transport when I only earn minimal amount for the 1.8 days in that fortnight. Then all my other uber, taxi expenses for the fortnight are on me. “

“Kimberley limited to no public transport. Taxi too expensive and reliant on service providers to transport.”

“I use ordinary Swan Taxis, yet as the fleet modernises it is getting harder and harder to get into the taxi from my wheelchair. I have to be sure I am always sent a Ford or Holden station wagon. Even with a pin number I use every time I ring quite often a car I cannot get into arrives at first, as in a Prius. The seat is too high, and the running board/door jam is too wide so the chair is too hard to get into.”

**5. Do you find that the current processes with regard to making a complaint or seeking information are sufficient or sufficiently responsive?**

We did not receive any feedback on the responsiveness of complaints in our survey. General feedback we receive from members is that Transperth are quite responsive and have good staff that aim to be inclusive. The feedback line is getting more usage but the alternative mechanisms are not in regular use from Transperth staff.

“When I rang to suggest they have a texting service I was told it takes about 3 hours to answer!”

One of the biggest issues is lack of responsibility when there are issues that cross departments or authorities such as bus shelters, pedestrian crossings at bus and train stations and footpaths on main roads or local roads linking to stops and stations. It can be extremely difficult getting clarity on which authority is going to take responsibility to get work done. An impasse between local government and the Public Transport Authority led to a number of years where no bus shelters were being built in some areas in Perth.

“Who is responsible? We need a contact to issue complaints. Communications between PTA / Transperth / Main Roads / Councils”

**6. As a body representing the views of people with disability, do you have any specific responses or perspectives with regard to the issues raised in the questions above?**

At the forum that we held with public transport users we asked for them to provide ideas and suggestions for things which could improve access to public transport. Our forum included people who with a range of disabilities and needs including people who are wheelchair users (manual and electric), deaf, blind, amputee, autistic. They provided the following solutions:

* Develop a real-time transport locater app. or add to the Google Maps
* Provide shelter at more bus stops, train stations, and on access bridges over Freeway
* All stations should have smooth, concrete cement or tiling
* Get train drivers to assist with ramps where stations have gaps
* Staff training package for all transport and taxi staff which includes how to assist and when not to assist disabled persons - disability Advocate should co present with peope with disability
* App / Website. What services are at my destination (rest stop available)? What services are on all my connections? Apps available for notification of changes of bus/ train eg. bus breaks down, but written in simple English
* Easy English information to understand timetables and stops, how to stop bus etc
* They must have an emergency Auslan interpreters’ numbers on each security staff, platform staff etc in case they want to talk to deaf customers
* In London, there is a sign that says that prams/pushers must move out of the area to allow wheelchair to fit in.
* On buses install handles just outside the door on each vehicle (recessed grab rail similar to on Melbourne Trams)
* Install hailing touch screen/ sensor screen.
* Bus driver should state route number at station/pick up
* Consistent style of stands for popular buses with shelter
* Bus drivers should check their bus before leaving depot and at each turn around for working ramp
* Check CBD stops to ensure street braille aligns with crossing / bus stop.
* Somehow (maybe government regulation) get all aeroplanes to have policy similar to flying to USA
* Would it be possible to have own wheelchair strapped in the aeroplane?
* Position of tag on/off machines needs to move when some light reflects off the screen, cannot see the info.
* Caption for on-flight movies + trains + coaches
* Flashing lights on all fire alarms
* Flashing warning light to alert the train doors about to close
* Message boards at all train stations for announcements of delays/alternative routes/transport and messages need to be slow enough to read..
* To encourage community involvement, cheap fees on Sunday perhaps $1 all-day pass to allow the lack of Transport avail. (similar to Sydney)
* Public transport passports (like student cards) for free transport for people with disability (applied for through the department) - Similar to London
* Public Transport staff should learn basic sign language relevant to common conversations in their workplace
* Free public transport

**7. What other issues you would like to see addressed?**

Given our large regional and remote areas in WA the issue of a lack of public transport in the wheatbelt and in regional centres was raised as a major issue. People wih disability are less likely to have cars. Although there has been an increase in the South West coach services being accessible it is not replicated further north.

“Not enough services in the wheatbelt. My disability has taken my license and I can't cope with 12 hour days – currently one train per day to wheatbelt.”

“The Avon Link service needs to be more promoted and supported by government. Not just for older people, but is a service that could add value to tourism in WA”

“Please include regional people. There is no accessible transport out here and rail transport for wheelchair users must be pre booked and is rarely accessible in other regions.”

Generally trains are considered easier to acess than buses and there is no trains outside Perth Metro apart from to Kalgoorlie and Australind.

"More frequent trains. Train travel easier than bus but timetable makes it less user friendly"

"Needs to be more trainlines as better service than the bus”

**Nothing about Us without Us**

Consultation with people with disability is a key consideration for any decisions and investments in accessibility. The involvement of people with disability which includes a range of disability types from design stage and all the way through the build leads to better outcomes as can be seen with large infrastructure projects such as Perth Optus Stadium. In contrast the Elizabeth Quay development had the minimum inclusion of people with disability from design to build and has some serious access issues with the materials, placement of TGSI’s and signage. PWdWA now offer a co-design service to organisations and agencies which can be accessed to assist with this process. Codesign needs to be embedded as a standard in the design of infrastructure and services like websites and Apps to ensure truly inclusive environments.

Further informationon our organisation and the codesign model can be found at <https://www.pwdwa.org/our_campaigns/connect_with_me.html>