

# Blind Citizens Australia

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Mr Paul Neville MHR  
Chair  
House of Representatives  
Standing Committee on  
Transport and Regional Services  
Via email: [trs.Reps@aph.gov.au](mailto:trs.Reps@aph.gov.au)



Dear Mr Neville

Thank you for the opportunity to contribute to the House of Representatives Standing Committee on Transport and Regional Services' Inquiry into the impact on regions of privatisation of infrastructure and government business enterprises. This submission will address the impact of the privatisation of public transport infrastructure on the capacity of people who are blind or vision impaired to enjoy their rights to participate fully in society.

## **Blind Citizens Australia**

Blind Citizens Australia is the united voice of blind and vision impaired Australians. Our mission is to achieve equity and equality through our empowerment, by promoting positive community attitudes, and by striving for high quality and accessible services which meet our needs. We have fifteen branches across Australia in metropolitan, regional and rural locations. Our 3,600 (approximate) members come from all States and Territories and include people from various ethnic and linguistic groups.

Through their involvement in local branches and our state and national publications, our members gain opportunities for peer support and social interaction and access to blindness-specific information and advocacy support. Our national, Victorian and Western Australian offices provide information and individual and systemic advocacy support, and our NSW office a limited information service, to all people who are blind or vision impaired.

## **Introduction**

The importance of safe, reliable and accessible public transport for people who are blind or vision impaired cannot be overstated. The following is taken from Blind Citizens Australia's Transport Policy (copy attached).

Public transport is vital to blind people. In many instances, public transport means the difference between independence and dependence on other people. This is particularly true for blind people because they are excluded from obtaining driver's licences. The achievement of equal access to work, education, recreation and community facilities for blind people is dependent on the availability of accessible and affordable public transport.

## **Overview**

Australia's States and Territories provide public transport services in very different ways. For example, the public transport system in Victoria is decentralised and run by many operators. Following the privatisation of the tram and metropolitan train system in 1999, three private operators were given contracts to operate various parts of the rail and tram networks (this has since reduced to two operators and may soon be limited to a single operator). The company V-line runs rail and bus services in rural and regional Victoria. Many different bus companies service metropolitan Melbourne.

In contrast, Queensland's public transport is relatively centralised. The rail system is run by QR, a State Government-owned corporation, and bus services in metropolitan Brisbane are operated by the Brisbane City Council. Private bus companies service the remainder of the state.

In our experience the degree to which a state or territory public transport system is centrally controlled and whether or not it is operated by a public provider are important factors in determining the capacity of the system to meet the needs of people who are blind or vision impaired. We have enjoyed much greater success addressing transport accessibility issues in Queensland than we have in Victoria, despite having a staffed office in Victoria.

To some extent, the recent introduction of the DDA Standards for Accessible Public Transport should overcome the impact of these factors by providing minimum standards for accessibility. However the Standards will not achieve truly accessible public transport systems for people who are blind or vision impaired living across Australia because they:

- do not address key areas of concern for people who are blind or vision impaired;
- are not updated frequently enough to take account of changes to Australian Standards; and,
- provide only minimum access standards, not best practice.

Three key issues need to be addressed if all blind or vision impaired Australians are to have access to public transport systems which are safe and which they can use with dignity, irrespective of where they live:

- consistent application of access modifications;
- effective, mandated consultation; and,
- explicit and transparent contracts.

### **Consistency**

People who are blind or vision impaired require adjustments to be made to public transport rolling stock, premises and infrastructure if they are to be able to use them with safety and dignity. These adjustments are outlined in the attached Blind Citizens Australia Transport Policy, and include the installation of warning tactile ground surface indicators, which assist a person who is blind to find the edge of a train or tram platform, the use of contrasting colours on a train to assist a person who is blind to find the doors, and the provision of clear audible announcements.

For these adjustments to be useful to a person who is blind, they must be consistently and reliably applied across Australia. For example, for people who are blind or vision impaired to trust the information provided by warning tactile ground surface indicators, they must always be placed 300mm from a hazard. People who are blind or vision impaired will not feel safe using public transport unless they can be sure that they will be provided with clear audible announcements about transport services.

Our experience is that achieving this consistency of modifications is much more difficult in a privatised environment. Following the contracting of three different companies to provide public transport services in Victoria, we have ended up with widely varying designs for tram and railway rolling stock, premises and platforms. Some operators provide automated announcements, others do not. As a result of these differences, people who are blind or vision impaired are planning their public transport trips around the accessibility of certain train, tram or bus stations. In Melbourne, people who are blind or vision impaired are refusing to use some inner city stations, for example Richmond Station, because they are too dangerous. In these cases, if using a different train station is not an option, people will use a more expensive form of transport such as a taxi, or will not make the trip.

### **Consultation**

Consistency requires effective consultation. To a large degree, the inconsistency outlined above is the result of public transport operators failing to meaningfully consult with disability consumer organisations like Blind Citizens Australia. Some operators consult with service providers rather than with people with disabilities, ignoring that people who are blind can and do speak for themselves and that most people who are blind or vision impaired

do not seek or receive orientation or mobility services from these organisations. Some operators consult with people with disabilities but simply ignore the feedback they receive if it does not align with their pre-existing plans.

Consultation with people who are blind or vision impaired is vital given the limitations to the DDA Standards for Accessible Public Transport outlined above. As stated, the Standards do not address many areas of access which particularly affect this group including the provision of emergency exit information in an accessible format and accessible pathways into and from transport premises. Although not included in the Standards, these items are still covered by the Disability Discrimination Act, however operators in the main are not addressing them. This is a manifestation of the problem that some operators, both public and private, do not view the Standards as providing guidance on how to achieve the minimum level of accessibility, but are rather viewing them as prescriptions for the most they have to do.

It is our experience that private transport operators are more inclined than public operators to view the Transport Standards as hurdles to be overcome as cheaply as possible. It is also our experience that public providers are more willing to update their processes to reflect best practice than private providers.

Due to the long delay in introducing the Transport Standards, they were out of date before they were introduced. The Transport Standards reference Australian Standards; in relation to modifications to suit people who are blind or vision impaired, one of the most important Australian Standards is AS 1428.4 which concerns the installation of tactile ground surface indicators. The Transport Standards reference the 1992 version of AS 1428.4, however by the time the Standards were introduced in 2002, AS 1428.4 had been substantially revised. The latest version of AS 1428.4 was published in 2003.

Some transport providers have been willing to update their practices to reflect the updated Australian Standard in recognition that this will ensure that best practice for people who are blind or vision impaired is achieved. However, other providers are unwilling to do so until the Transport Standards are formally revised in 2007. Of course, by this time, the Australian Standard will also have improved and we will experience a lag in consistency again. This lag could be overcome through meaningful consultation with Blind Citizens Australia and a commitment, contractually enforced if necessary, to meeting best practice in accessibility, not minimum standards.

### **Explicit and transparent contracts**

The need to ensure accessibility must be explicitly and transparently outlined in contracts between governments and private operators.

On those occasions where Blind Citizens Australia has assisted people who are blind or vision impaired through federal and state disability discrimination complaints processes, we have assumed that state government contracts with private transport providers contain requirements that the service be provided in a way that ensures the greatest accessibility. This is because these services are provided by the private providers on behalf of the state. However, while the private providers have not denied this, neither have they confirmed it. This lack of transparency makes it difficult to negotiate with the providers.

Contracts must make it explicit that private transport operators are providing a service for, and on the behalf of, the state because this will impact on the applicability of the unjustifiable hardship provisions contained in the DDA Standards for Accessible Public Transport.

### **Conclusion**

We trust this information assists the Committee. We would welcome the opportunity to expand on the issues outlined above and are happy to provide the Committee with further information should it be required. For further information, please do not hesitate to contact Ms Collette O'Neill, National Policy Officer, on 03 95726400.

Yours sincerely

Robert Altamore  
**President**