Council for
Intellectual Disability

Submission on the Reform of the Disability Standards for Accessible Public Transport

Photo of the CID Advocacy Group auditing accessibility of trains in Sydney

Contact

Justine O'Neill

CEO

██████@cid.org.au

www.cid.org.au

Contents

1. Who we are

NSW Council for Intellectual Disability (CID) is a systemic advocacy organisation that works to ensure all people with intellectual disability are valued members of the community. CID has been a leader in disability rights for more than 60 years. People with disability are at the front and centre of everything we do – they are decision makers, staff members, board members and spokespeople. We work to build a community that protects rights, includes everyone and supports people well. We focus on issues that people with disability tell us are important, such as the NDIS, health, jobs, education, transport and safety.

CID promotes human rights. We help people with disability to be heard, we speak up on the big issues and campaign for change. We advise on how to be more inclusive so that our society is equal and accessible.

We believe people with disability should have the same opportunities as everyone else. Through CID all people with disability and their families and supporters can learn, build skills, and actively participate in the community. We provide information, hold workshops and develop useful resources. We go to community events, share our stories and connect with peers.

2. Methodology

Throughout this submission, we have included quotes from our members and staff with intellectual disability that highlight key issues around accessibility in their own words. CID has an Advocacy Group; the membership are all people with intellectual disability. They meet regularly to develop and run campaigns for the rights of people with intellectual disability. The Advocacy Group have been working on and campaigning for transport accessibility for many years and has been consulted multiple times by Transport for NSW. More of their work on transport accessibility can be found on our website[1].

We have also drawn on our extensive professional experience in advocating for accessible transport for people with intellectual disability.

We were pleased to see that the key points in this Stage 2 consultation were provided in Easy Read, and that people were offered several different options to respond. However the interactive survey was not accessible to some people, and there were some elements of the standard survey people wished to comment on too. As such, we have identified those issues which are of most relevance to people with intellectual disability and consulted separately with our members on them. They are listed below.

---

[1] https://cid.org.au/issues/transport/

3. Introduction

The proposed reforms and the Stage 2 Regulation Impact Statement do not specifically include access provisions for people with intellectual and other cognitive disabilities[2]. People with intellectual disability tell us that they often feel left out of accessibility provisions.

Public transport is critically important for people with intellectual disability, especially as many do not drive. Without public transport, their access to the community would be minimal as indicated below in quotes from our Advocacy Group members and staff with intellectual disability.

> *We rely on transport. We cannot drive, so it is essential and it is vital to our independence - Anthony*

> *Transport is the ticket to our freedom and independence - Anthony*

> *It links us up to the community, to work and a social life. It is an essential service so should be accessible for all - Rebecca*

The importance of equal access to transport and relevant information is highlighted in the United Nations Convention on the Rights of Persons with Disabilities (CRPD). Article 9 states:

> *To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas.* [3]

---

[2] Reforms of the Disability Standards for Accessible Public Transport 2002—Stage 2 Consultation Regulation Impact Statement
[3] https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html

Key transport issues identified by people with intellectual disability

4. Signage and wayfinding

Choice of signage, clear and easy wayfinding, accessible information, text print size, language choices and accessible pictograms are all important elements to ensure transport is accessible and inclusive for people with intellectual disability[4]. Often, this is overlooked and graphic design and branding may conflict with accessibility for people with intellectual disability.

Accessing a train station with letter T in the background

For example, in NSW different modes of transport use a letter, for example T for trains and F for ferries. Use of these letters as signage indicates a transport stop and station. Pictograms rather than letters of the alphabet should be the standard as pictograms are much easier to understand and therefore make transport more accessible for people with intellectual disability.

> *I don't know what F means; I wouldn't know that F means a ferry – Rebecca*

> *I like pictures or diagrams, not letters – Justen*

Recommendation 1

- Amend the Transport Standards to use pictograms instead of letters for stations and stops.

4.1 Cognitive access for signage and information

Signage and information are often not accessible to people with intellectual disability. Different modes of transport use different signage, which is not consistent.

> *The choice of colours is also essential. Different colours are confusing - Shannon*

4.2 Easy Read

Terminology and language need to be easy to understand. This includes not using jargon, complex words, or abstract concepts. Simple everyday language should be used.

Easy Read style should apply anywhere written text is used.

---

[4] Haveman, M., Tillmann, V., Stöppler, R., Kvas, Š. and Monninger, D. (2013), Mobility and Traffic Abilities. Journal of Policy and Practice in Intellectual Disabilities, 10: 289-299. https://doi.org/10.1111/jppi.12059

Easy Read is a form of direct communication that uses everyday language with pictures to explain meaning. Easy Read is suitable for many people with intellectual and other disabilities. It can also be useful for people with low literacy, people learning English, older people or those with limited time. Easy Read increases a person's ability to understand information, make choices and be part of their community[5].

Views from our members:

Don't use complicated words - Anthony

Words on apps are confusing – Kylie

Please all signage in easy read please – Shannon

Maps are really hard to understand and are confusing and sometimes they are missing – Justen

Using jargon words is not good, I don't understand. Things like 'modified service' I don't know what that means – Anthony

We need easy read for everything. That would be a big help - Jack

Information is written by and for people with lots of education, not the general public or people like me – Anthony

Easy read style should apply to printed documents and provide some guidance in other formats.

- Arial font size 14 or 16 minimum
- Dark text on light background
- All margins 2.5cm – top, bottom, left and right
- Line spacing minimum 1.5 or double line spacing
- Bold for headings or to highlight a point, but not for whole sentences
- No underlining or italics
- Short sentences in everyday words
- Minimal punctuation
- Avoid acronyms, jargon, slang
- Explain acronyms where essential
- Avoid jargon, slang and technical terms
- Avoid words with more than 3 syllables
- One idea per sentence
- Start each sentence on a new line

---

[5] Newman, B. (2020). *Using easy read information about mental health for people with intellectual disability* (Doctoral dissertation, Ph. D. Dissertation. University of New South Wales (UNSW). Sydney, Australia. http://unsworks.unsw.edu.au/fapi/datastream/unsworks: 71950/SOURCE02).

- Limit punctuation
- Personalise language; use first person language "you" or "we"
- Be consistent with tense
- Use full words, for example do not instead of don't
- Repeat or emphasise key points and instructions
- Test Easy Read publications with people with lived experience.

Recommendation 2

- Use simple, everyday language for all communication regarding transport services. Avoid jargon or abstract concepts. Follow Easy Read style guidance where text is used.

5. Real-time communication

Real-time communication is often difficult for people with intellectual disability to understand. Real-time communication includes passenger information displays, audio announcements and signage. Unless real-time information is clear and uses easy to understand language, it will not be accessible for people with intellectual disability.

Below are some quotes from people with intellectual disability we consulted.

> *I have to talk to staff – Kylie*
>
> *I talk to the bus driver otherwise I have no idea where to get off, especially in areas I do not know – Rebecca*
>
> *Buses have screens to tell you the next stop but they never turn them on - Anthony*
>
> *The apps for live transport sometimes tell you the wrong information, for example, it tells you a bus has left when it hasn't – Anthony*
>
> *There should be announcements and signs on buses and trains telling you what the next stop is - Justen*
>
> *When something goes wrong – like there is a train strike or trains are not running– I don't understand what I have to do, I get confused and there is nobody there to help me – the signs are confusing they need to be there to help passengers when something goes wrong* **-** *Justen*

We support an amendment to Transport Standards Part 27 as suggested in the department's factsheet[6] which reads,

> *Passengers who require service related information, who wish to communicate service related information, or who need assistance or*

---

[6] https://www.infrastructure.gov.au/sites/default/files/documents/real-time-communication.pdf

help on service related matters must be able to engage in real time communication with the transport operator or provider before boarding, while the conveyance is in transit and after alighting. This real time communication may involve direct assistance.

Another issue identified was that time is often displayed in 24 hour format, which is not accessible.

I can't read the timetable because it is 24 hours (clock). I don't understand the 24 hours timetable for buses and trains I only understand 12 hours – Justen

Recommendation 3

- Amend Transport Standards Part 27 as suggested in the department's factsheet on real time communication.

Recommendation 4

- Time should be displayed in 12-hour time.

6. Technology use

Technology is innovation but a lot of technology is not innovative for me. It is not innovating to take away all the staff who I need to help me – Anthony

Technology has increased accessibility for many people with disability, however, much of the technology is not accessible for people with cognitive and intellectual disability. Society's increasing use of technology has

…largely overlooked consequences for people with limited digital literacy and resources, including many people with intellectual disability. People with limited access to internet connectivity and devices are at risk of missing out on numerous resources and opportunities. Access barriers to digital platforms and the opportunities these hold can reinforce existing social and spatial inequalities[7].

---

[7] Ellen van Holstein, Ilan Wiesel, Christine Bigby, Brendan Gleeson, People with intellectual disability and the digitization of services, Geoforum, Volume 119, 2021, Pages 133-142, ISSN 0016-7185, https://doi.org/10.1016/j.geoforum.2020.12.022.

6.1 Websites and apps

Cognitive and learning disabilities impact how people process information. For example, they can affect people's perception, memory, language, attention, problem solving, and comprehension.[8]

Most transport websites use Web Content Accessibility Guidelines (WCAG) 2.1, however, compliance with these standards does not necessarily mean accessibility for people with cognitive disabilities. If a website uses complex language and/or it is difficult to navigate, the website will not be accessible for people with intellectual disability.

I don't like using the website, I don't really understand it. I prefer to phone 131 500 – Justen

Websites make it hard to find information – Kylie

NSW tried to abolish the information line, this would of made it so hard for people with intellectual disability to get information about transport – Anthony

We believe that transport websites should also adopt the Cognitive Accessibility Guidelines for websites[9]. The Cognitive Accessibility Guidelines better enables websites and information to be accessible for people with intellectual disability.

When WCAG3 is finalised, it will include the conformance for "Use Clear Words".

People with intellectual disability often cannot use or afford smartphones and rely on other ways to obtain information such as trip planning. There is an increasing push towards using apps and technology, which often excludes people with intellectual disability.

They don't print paper timetables anymore – Advocacy Group member

We are always told to use apps, I can't use apps – Steven

Recommendation 5

- Amend the Transport Standards so that transport websites and apps must also adhere to the Cognitive Accessibility Guidelines[10].

Recommendation 6

- Continue to provide information in printed form in addition to digital technologies.

---

[8] https://www.w3.org/WAI/cognitive/
[9] ibid
[10] ibid

6.2 Information and communication technologies (ICT) procurement

New technologies are often procured without user testing by people with intellectual disability. All new technology should be fit for purpose and accessible for all to avoid rollout that then requires expensive changes and retrofitting.

Recommendation 7

- All ICT technology procured should require user testing, including user-testing for cognitive access and it should be compliant with the Cognitive Accessibility Guidelines.

7. Accessible fare and ticketing systems

People with intellectual disability have told us that electronic/smart card ticketing systems are confusing. Particular issues include: remembering to tap off, the inability to obtain an Opal card in NSW at a train station, issues with retailers and the time it takes to obtain or replace a pensioner Opal card.

Below are quotes from our members on their experience using the Opal ticketing system in NSW.

Advocacy Group member Anthony using NSW Opal card reader

The Opal system in Sydney is confusing – Advocacy Group member

You cannot get an Opal card at a station but instead have to go to a supermarket or a retailer – Anthony

It is very difficult to get a pensioner Opal card. You have to give lots of proof – Anthony

If you lose your pensioner Opal card, you have to wait a long time to get a replacement. This means we have to pay full fare until it comes in the mail. This is not fair or equal. – Shannon

I don't like Opal Cards – I forget to tap off, I've been fined a few times. In Queensland they tap off for you if you forget – that's better – Justen

I get double charged with Opal because I forget to tap off – Jack

When you top up in the shop they don't want you to spend just $5 they try and get you to spend more money on other things – Anthony

Recommendation 8

- People with disability should be able to obtain tickets at the point of transport and not just at retailers.

Recommendation 9

- Build in an automatic tap off to accommodate passengers who forget to tap off.

8. Transport staff availability and training

People with intellectual disability have told us that having access to trained staff is important for their accessibility. Training for transport staff should be consistent across the same mode of transport regardless of who provides the service – government or private providers - and should be co-designed and co-delivered.

> *Staff are important. They help me when I need help – Advocacy Group member*
>
> *They need to learn not to discriminate against people with ID. We want respect and courtesy. Some staff have no education - Rebecca*
>
> *No discrimination. People often treat me differently because I have a hidden disability.*
>
> *I find that I get more help when I ask for it if I have my walking stick with me than when I don't have it with me. People make assumptions - Rebecca*
>
> *One time I asked the driver to let me know when it was my stop to get off. He just pointed to a sign that said not to talk to the bus driver when the bus is moving. A lot of bus drivers are rude and don't have training – Rebecca*
>
> *Sometimes the bus drivers get nasty with me but I get confused and sometimes I don't know where I am. Sometimes I end up on a bus going in the wrong direction and the bus driver doesn't help me – Justen*

With the new technology, staff have either been reduced or removed. People with intellectual disability have told us that staff make a huge difference to their experience and accessibility of transport.

> *Not enough staff to help. Staff are always under pressure to be on time. They don't let you sit down first and take off and you can fall over.*

When there are no staff at the station, the toilets are locked, so I often cannot use the toilet.

I was on the train and then the destination changed. I didn't know how to get help. I panicked and got off the train. I then couldn't find any staff to help me and I had to ask members of the public to help me find staff at the train station – Rebecca

We need things other than just digital, we need staff to help us.

Staff hide in their cabin and so don't come out. You can't find staff when you need them. They need to be easily found and they need training – Advocacy Group member

Recommendation 10

- Training for transport staff should be consistent across the same mode of transport regardless of who provides the service. Staff training needs to include topics such as eradicating discrimination, educating, changing attitudes and meeting the needs of people with intellectual disability.

Please also see Recommendation 16 regarding staff availability.

9. Rideshare

Our members told us they are concerned with the lack of regulation and accessibility requirements for rideshare providers.

There are no regulations for rideshare, there are no requirements for things like accessible cars. Training and regulation is needed – Anthony

As discussed in the technology section below, many people with intellectual disability are unable to afford or use smartphones. As a result, they are unable to use rideshare services. There needs to be other ways to order rideshare services that are accessible for people with intellectual disability such as an over the phone ordering service to ensure that there is equivalent access.

You can only order using an app. Many people with intellectual disability don't know how to use apps or smartphones. Many can't afford a smart phone – Advocacy Group member

I tried Uber once, it didn't work. I don't know what I am doing. It is too complicated. I can't register myself on the App, they want to know everything about you, I don't want to tell them everything - Justen

> *You put down your destination and then you find out there are no cars coming, it doesn't work – Justen*

Many people with intellectual disability struggle to use credit/debit cards, especially those under financial guardianship. People under financial guardianship often have set amounts of funding put into their account or onto their transport ticket card (e.g., Opal card in NSW) and are unable to flexibly use their money. As a result, their use of credit/debit cards is very limited, which means using a rideshare services is near impossible.

> *They only take cards they don't take cash. Some people with intellectual disability can't use cards and don't have them - Advocacy Group member*

> *Rideshares refuse to take short trips, so do taxis. What do you do? - Advocacy Group member*

Recommendation 11

- Rideshare services should have regulations and requirements for the provision of accessible vehicles to the same level as the mainstream taxi service.

Recommendation 12

- Rideshare services should have accessible and alternative ways to access their services, such as a phone ordering service.

Recommendation 13

- Disability training should be compulsory for rideshare providers.

Recommendation 14

- Those developing policies about rideshare should consult with providers and people with disability on acceptable alternatives to credit card payments.

10. Taxis

People with intellectual disability told us that while overall taxis are more accessible than rideshare, there are barriers and experiences of discrimination and abuse. Quotes below highlight the key issues people with intellectual disability face when using taxis.

> *Many taxis will not take me and my assistance animal (MindDog). I often face this discrimination – Kylie*

One time I took a taxi with my support worker and we wanted to go to the city. The taxi driver took me somewhere else and I said this is not the city. He yelled at me about me having a disability - Kylie

I have experienced taxi drivers being sexually inappropriate towards me and trying to touch me. I think it is because I have a disability – Rebecca

I always use taxis but sometimes I have been refused rides by taxi drivers when they see me – Justen

Recommendation 15

- Disability training should be compulsory for taxi providers.

11. Safety

People with intellectual disability tell us that safety on public transport is one of the most important things to ensure they are confident they can use public transport. Sadly, experiences of bullying and discrimination on transport are common.[11]

I am too scared to report issues to local transport companies because of retaliation – Anthony

Announcements are often not clear what is happening - Steven

I am scare of bullying on public transport. I feel safe when there is security or police around - Kylie

We need security guards or police on trains – they should never have removed the transit officers – Shannon

Staff need to be trained to deal with things when things go wrong – Jack

I get very anxious because of the security at train stations - Steven

You can never replace people with cameras – cameras can record but not intervene when needed – Shannon

Recommendation 16

- Staff including security staff should be present on all modes of transport and as an available point of contact at train stations.

---

[11] Wayland, S., Newland, J., Gill-Atkinson, L., Vaughan, C., Emerson, E., & Llewellyn, G. (2022). I had every right to be there: discriminatory acts towards young people with disabilities on public **transport. *Disability & Society*, *37*(2), 296-319.**

Recommendation 17

- Security and transit officers should be required to undertake disability training.

12. Summary of recommendations

Recommendation 1

Amend the Transport Standards to use pictograms instead of letters for stations and stops.

Recommendation 2

Use simple, everyday language for all communication regarding transport services. Avoid jargon or abstract concepts. Follow Easy Read style guidance where text is used.

Recommendation 3

Amend Transport Standards Part 27 as suggested in the department's factsheet on real time communication.

Recommendation 4

Time should be displayed in 12-hour time.

Recommendation 5

Amend the Transport Standards so that transport websites and apps must also adhere to the Cognitive Accessibility Guidelines.

Recommendation 6

Continue to provide information in printed form as an alternative to digital technologies.

Recommendation 7

All ICT technology procured should require user testing, including user-testing for cognitive access and should be compliant with The Cognitive Accessibility guidelines.

Recommendation 8

People with disability should be able to obtain tickets at the point of transport and not just at retailers.

Recommendation 9

Build in an automatic tap off to accommodate passengers who forget to tap off.

Recommendation 10

Training for transport staff should be consistent across the same mode of transport regardless of who provides the service. Staff training needs to include topics such as eradicating discrimination, educating, changing attitudes and meeting the needs of people with intellectual disability.

Recommendation 11

Rideshare services should have regulations and requirements for the provision of accessible vehicles to the same level as the mainstream taxi service.

Recommendation 12

Rideshare services should have accessible and alternative ways to access their services, such as a phone ordering service.

Recommendation 13

Disability training should be compulsory for rideshare providers.

Recommendation 14

Those developing policies about rideshare should consult with providers and people with disability on acceptable alternatives to credit card payments.

Recommendation 15

Disability training should be compulsory for taxi providers

Recommendation 16

Staff including security staff should be present on all modes of transport and as an available point of contact at train stations.

Recommendation 17

Security and transit officers should be required to undertake disability training.