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Stage 2 Reform of the Disability Standards for Accessible Public Transport Submission.

Overview

Deafness Forum Australia is the peak body representing the views and interests of the 4 million Australians who live with hearing loss and hearing related disabilities. Deafness Forum offers the following comments to Transport for NSW on the Review of Disability Standards for Accessible Public Transport, as they relate to the provision of augmented hearing systems and real time communication.

Deafness Forum acknowledges the work of Transport for NSW to provide T-coil (telecoil) capability on trains, stations and other Transport facilities, however it suggests that a reliance on T-coil systems to provide access for people with hearing loss may not be serving most of Transport's passengers who have hearing loss.

One in six Australians experience some degree of hearing loss and it is predicted that by 2050 this will increase to one in four. (Ref: Deloitte "*Listen Hear*" Report 2006). Currently, over half of those effected by hearing loss are aged over sixty years.

Figures from the Hearing Care Industry Association suggest that only one in four people who could benefit from a hearing aid have one and there is an average gap of seven years between a person needing help with hearing and actually seeking help. (Ref: Deloitte "*Listen Hear*" Report 2006).

Population studies have shown that the rates of hearing aid ownership have been consistent over the past twenty years with a significant growth in the number of people over 60 years who were more likely to have hearing difficulties. Of particular concern is the issue of people not using hearing aids. One study (*'Is the provision of rehabilitation in adult hearing services warranted? A cost benefit analysis'* A Hogan et al 2020) revealed that only 45% of hearing aid owners were regular device users and there was a non-usage rate of 24%.

It is estimated that 70% of hearing aids are fitted with a T-Coil (telecoil) although this is less likely with very small devices. However, while many aids still have a T-Coil installed, many wearers do not have this activated or they don't use it even if it is activated.

Developments in hearing device technology are tending to reduce the awareness and use of T-coil systems. In the constant drive to reduce the size of hearing devices, T-coil features are being

omitted from new models. Most new communication technology is focussed on a one-to-one linkage between the user's hearing devices and another personal device, such as a smartphone or a TV or entertainment system, based on Bluetooth or similar radio technology. Such one-to-one communication systems are not suitable for broadcasting information to multiple people, as is required in the transport environment.

This means that the proportion of hearing devices in use that have T-coil capability is reducing, and people's awareness of the benefits and functions of the T-coil system is also reducing. In this environment the reliance of TfNSW on T-coil technology may mean that it is serving the needs of progressively fewer people.

On-line Opal data reveals that in June 2022, there were 20 million Opal card trips in the month. It is accepted that 1 in 6 people in the general population have some degree of hearing loss, suggesting that 3.33 million passengers per month have hearing loss. Of this number, data from the Hearing Care Industry Association suggests that only 1 in 4 of people who could benefit from hearing devices actually have them – in Opal patronage terms, 833,000 passengers per month are wearing hearing devices. It is then estimated that only 70% of hearing aids in use now have T-coil capability, or 583,000 passengers per month, and of these passengers, only 20% actually use the T-coil on a regular basis. On this basis the best estimate is that about 116,000 passengers per month, or 3,870 passengers per day. In percentage terms, 3.5% of Opal card passengers are likely to benefit from T-coil technology.

Many of Transport's patrons with hearing loss will rely on familiarity and fixed signage to negotiate the transport system successfully, until an incident occurs and operations are disrupted. The analysis above suggests that the use of audio systems to transmit operational and safety information is likely to be inadequate for many passengers with hearing loss. The implications of this are that many people will be inconvenienced, including possibly to the extent of avoiding Transport's services in the future. The more serious implication is that some of these people, who don't hear or don't understand the audio information, will find themselves in an unsafe situation.

On this basis, Transport's strategy for supporting passengers with hearing loss needs to include other forms of one-to-many real-time communication, such as text-based visual signage.

Real Time Communication

It is acknowledged that the Transport Standards do not currently require real time communication between operators or providers and people with disability while undertaking a public transport journey and do not meet the purpose of the Transport Standards that seek to remove discrimination for people with disability in relation to public transport services.

For people with hearing loss the preferred option to the amendment to the Transport Standards Part 27 would be the **Regulatory option**, stated as follows:

"Transport Standards Part 27 would be amended to include the following (including any requirements retained or amended from the status quo):

- Passengers who require service-related information, who wish to communicate service-related information, or who need assistance or help on service-related matters must be able 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.

Guidance would be provided in the Transport Standards Guidelines and / or The Whole Journey Guide on real-time communication.”

Specific guidance may include:

- Guidance on how to improve the lines of communication between operators, providers and passengers in real time
- Examples of real time communication
- Recommend for disability awareness training for operators and providers.

It is imperative that real time communication is easily available for all passengers using public transport services.

For people with hearing loss this is more critical when service disruptions arise such as delays and cancellations or when railway stations or other transport access points are unmanned. The information is then usually provided through amplified audio announcements on a train for example or on stations (if manned) by staff who may normally not have this role and who may not be able to provide precise information, or the clarity needed for clear communication.

A Personal Experience

Most people with hearing loss would be able to relate stories of difficulty during disruption of transports services. One member of Deafness Forum reported the following incident:

She has severe hearing loss and relies heavily on high quality hearing devices. Recently she was on a train journey that was experiencing an extended delay. There were audio announcements on the train but this time it was unintelligible, largely because the sound system on that carriage was faulty. The real time station signage on the train could offer no information on the delay and was not visible from the vestibule of the carriage.

On arrival at the next train station there was unclear advice about the need for passengers to disembark and the amplified message on the station was little better. The heavily accented station master was also speaking quickly, complicated by the fact that there was a lot of background noise. This led to much confusion for many. She had little idea of the alternative arrangements and resorted to asking a complete stranger where they had to go and whether or not other arrangements were being advised.

Fortunately, this incident did not threaten her safety, but it was certainly frustrating and inconvenient. It also reminded her forcefully of her disability and that under these circumstances she was not able to act independently as she normally does when travelling.

The incident is not the only time that the transport system’s communication strategies during disruptions have not met her needs.

In this situation, the isolation and helplessness felt by this person would have been typical of people who have hearing loss and, considering the analysis above, there could easily be many people, both those using hearing devices and those who were not, experiencing similar difficulties on a daily basis during public transport journeys.

The experience of people with hearing loss is often to only understand some of the words in the stream of sound, i.e., to miss some of the messages they are hearing. People in this situation are trying to understand their environment based on only part of the information available to people with good hearing. This could be seen as analogous to a transport passenger with poor English language ability, only understanding a few words in any message.

Induction Loop/T Coil Access

As indicated in the introduction above, it is considered that a reliance on T-coil technology is not sufficient to meet the needs of the majority of passengers with hearing loss.

Neither the Regulatory option or the non-regulatory option/s for real-time communication provide enough clarity or options for people with hearing loss. Ideally, there needs to be **clear real-time text-based messaging** that can back up any announcements made. For example, in trains where there is rolling overhead real-time signage indicating the train route and upcoming stations, consideration should be given for updates from Rail Operations Centre to be displayed, if only to advise passengers to alight and wait for further official advice in times of delay. Real time electronic signage should also be clearly displayed at railway stations and other transport terminals.

Fixed Signage

All written and graphical transport related stand-alone signage (including maps and directions) on stations should be clearly visible and easily read and able to be understood by all commuters. e.g. clear directions to platforms, services and other related transport modes where applicable and specific directions for street exits for example (rather than directional ones such as 'South exit', 'North exit' etc).

This includes the recommendation of the regulatory option for the display of the International Symbol for Deafness which will support the harmonisation of the Transport Standards and Premises Standards and provide clarity to operators and providers on their obligation under the Disability Discrimination Act. If T Coil systems are installed in areas such as ticket/information booths, trains and platforms or other areas there should be clear signage visible to indicate their exact location and the area within which it operates.



Help Points

There are Help Points on trains and on railway stations, but these rely on an audio amplification system. They are operating in an environment of background noise, and messages may at times be given by members of staff with different voice pitches or accents, which are sometimes difficult for many people with hearing loss to understand.

Help points are also essentially one-to-one communication devices, between the passenger originating the call and the responder. They are not suitable for the broadcast of information to multiple people. A person who has hearing loss and who may not have the use of hearing devices is unlikely to be able to communicate effectively using current Help Point technology, especially in circumstances of stress, confusion or disruption.

A desirable real-time messaging system could be a screen that has speech to text capability for clearer communication to display the same message as was being transmitted orally (in other words, **live captioning**).

It is recognised that there could be operational and technical challenges for some of this to be implemented, particularly in terms of real-time electronic signage.

Apps

There are real-time communication apps available on smart phone devices (e.g. Tripview) which provide excellent timetable and travel information. This is a great way to access real-time information regarding timetabling and if there are delays or disruptions to services. However, given that a large percentage of the people with hearing loss who are aged over 65 years, many may not have smart phones or be able to manage this facility, particularly if they have dexterity issues or have no access to smart technology.

In addition, such apps are only as good as the accuracy and timeliness of the information that is provided to them to be broadcast. Tripview for example cannot tell a passenger to get off at the next stop and find alternative transport, or in a worst case, to evacuate the train or bus. I am not aware of any apps which would provide real-time guidance to passengers caught up in a transport incident or disruption.

Disability Training for Operators and Staff

Current disability training for staff and operators is very general, not disability specific and is slanted towards disabilities such as mobility and vision.

For hearing loss, the training needs to be more specific. Customer service staff and operators need to understand that it is **less** about speaking louder and **more** about ensuring that there is clarity in communication. Even with a hearing device, people with hearing loss can't always hear and understand audio messages or what others are saying as part of a conversation. It is especially hard when the messaging language used is heavily accented or there is background noise in areas where there may also be a lot of hard surfaces and open spaces such as on transport and at railway stations and other transport terminals. In person-to-person communication, people with hearing loss are very dependent on communication strategies such as having good lighting and direct face to face contact so they can lip read to understand what is being said. Unfortunately, the more recent wearing of face masks has made lip reading impossible and therefore much harder to understand face to face conversation as the sounds are also more muffled.

Deafness Forum Australia and the hearing support organisations that it represents are well placed to provide advice and to potentially provide training to staff on communication strategies for people with hearing loss and hearing related disabilities.

Conclusion

It is acknowledged that TfNSW has made commendable efforts to increase the accessibility of its services for people with hearing loss, by installing hearing loops. Unfortunately, however we know that TfNSW efforts are not reaching as many people with hearing loss as is desirable, especially in circumstances of disrupted services.

Deafness Forum Australia suggests that a combination of aural and text based real time information would better meet the needs of passengers who are living with hearing loss.

On behalf of Deafness Forum Australia I would be happy to discuss our position further if this would be of value to TfNSW. I can be contacted by email at [REDACTED].

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