

STATE PATRONS  
AUSTRALIAN CAPITAL TERRITORY Dr Richard G Pembrey, AM, MBBS, MD, FRACP, FRCPA  
WESTERN AUSTRALIA Her Excellency the Honourable Kerry Sanderson, AO, Governor of Western Australia  
NEW SOUTH WALES Dr Kevin A Rickard, AM, RFD  
VICTORIA Dr Alison Street, AO  
TASMANIA Lady Green  
QUEENSLAND His Excellency The Honourable Mr Paul de Jersey, AC, Governor of Queensland

President: Gavin Finkelstein  
Executive Director: Sharon Caris



9 August 2022

Director, Disability and Transport Standards, Land Transport Policy  
Department of Infrastructure, Transport, Regional Development and Communications  
GPO Box 594  
Canberra ACT 2601  
[DisabilityTransport@infrastructure.gov.au](mailto:DisabilityTransport@infrastructure.gov.au)

## **Consultation on Stage 2 Reform of the Disability Standards for Accessible Public Transport 2002**

Thank you for the opportunity to provide feedback on Stage 2 Reform of the Disability Standards for Accessible Public Transport 2002.

We have consulted about the reform area issues outlined in the consultation document with a sample of people with severe bleeding disorders. A summary of the responses is in the table in our attached submission.

An overall comment from the consultation was that it is important for anyone, including those with disabilities, to be able to access the transport system in a way that is as comfortable, safe, easy and non-discriminatory as is reasonably possible and for people not to experience barriers or penalties in access.

I consent to having this submission made public and published.

We look forward to the outcomes of the consultation.

Yours sincerely

  
Sharon Caris  
Executive Director



HAEMOPHILIA FOUNDATION AUSTRALIA

## Submission to the Department of Infrastructure, Transport, Regional Development and Communications

# Consultation on Stage 2 Reform of the Disability Standards for Accessible Public Transport 2002

### Date

9 August 2022

### Submitted by

Haemophilia Foundation Australia  
Sharon Caris, Executive Director

### Email

██████████@haemophilia.org.au

### Phone Number

██████████

### Street Address

7 Dene Avenue  
Malvern East VIC 3145

# About Haemophilia Foundation Australia and bleeding disorders

**Haemophilia Foundation Australia (HFA)** is a not-for-profit organisation that represents Australians with haemophilia, von Willebrand disease (VWD) and other rare bleeding disorders, including rare clotting factor deficiencies. As the national peak body for bleeding disorders, HFA represents and advocates for people with bleeding disorders and supports a network of state/territory haemophilia foundations. We also provide education and peer support to the bleeding disorders community and the general community, and promote and fund local research on bleeding disorders.

There are around 6,600 people who have been diagnosed with inherited bleeding disorders in Australia, including haemophilia, von Willebrand disease (VWD), rare clotting factor deficiencies and rare platelet function disorders. As a result of their bleeding disorder, the blood clotting process does not work properly. Without treatment they can bleed for longer than normal, usually internally, into joints, muscles and organs; and some bleeding episodes can be life- or limb-threatening.

Individuals with bleeding disorders are clinically diagnosed as having a mild, moderate, or severe form of the disorder. Without preventive treatment, people with moderate or severe forms of the disorder will have bleeding episodes more often, and those with severe bleeding disorders may have bleeding for no obvious reason. An acute bleeding episode can often result in internal bleeding into a joint, muscle or organ, with pain and swelling.

**Treatment** for inherited bleeding disorders often requires medicines that replace, stimulate the generation of or mimic the function of the clotting factor or platelet that is missing or not working properly. This treatment can be preventive ('prophylaxis') infused up to several times a week to assist in preventing bleeding episodes, or on-demand to treat the bleeding episode as it occurs. At times those having preventive treatment may also have breakthrough bleeding episodes.

Treatment also involves exercise guided by a musculoskeletal physiotherapist with expertise in haemophilia to prevent bleeding and protect joints, and to rehabilitate a joint or muscle back to full function after a bleeding episode.

## **Mobility and disability issues**

Over time bleeding episodes can damage muscles and joints, leading to **complications** such as severe arthritis and the need for joint replacements. This is often experienced by people with bleeding disorders over 35 years of age, who grew up without adequate treatment due to the limited availability of clotting factor treatment product at that time, and less so by younger people who have grown up with the benefit of preventive treatment.

Both acute bleeding episodes and the long-term complications of bleeds will often cause mobility and pain problems and people with bleeding disorders may use mobility assistance devices, including walking sticks and frames, crutches and wheelchairs, some intermittently and others regularly.

## Feedback

### Summary of responses relating to reform area issues

Reform area	Response
Rideshare	When Rideshare offers services to people who are disabled, for example, in vehicles that can accommodate wheelchairs or with extra legroom, it needs to be subject to the same standards as registered services such as taxis. It also needs to indicate on the booking system that it meets those standards so that people order appropriate vehicles, know the attributes of the vehicle they are booking and can make informed choices.
Dedicated school buses	There are a number of issues that can be problematic for a student with disabilities on a school bus: <ul style="list-style-type: none"> <li>• Getting on and off a school bus when the student is on crutches</li> <li>• Enough leg room if legs are stiff and do not bend easily</li> <li>• Is it feasible for a bus to transport a student in a wheelchair?</li> </ul>
<b>Information and communication about public transport</b>	
Better communication of accessibility features	Generally public transport information is online, available and easily accessible. To find the information online, community members would usually look at the trip planning information. Information needs to be accurate, consistent and cover the relevant steps.
Timely provision of information	Agree that the Standards should explain how soon providers should give people information about changes to their services. Providers need to provide information about changes to their services as soon as that information becomes available so that people with disabilities have as much time as possible to plan their options. It can take them longer to organize alternatives.
Real time communication	It is also important to have options to communicate with operators about where to go and how to go before travelling.
Passenger location during journey	It is important to have arrival and next stop information available both in voice announcements and on signs and screens to cover all requirements. The voice announcements alert those who have not noticed or can't read the signs from where they are sitting or because of vision difficulties.
Accessibility of signs and symbols: Letter heights and luminance Location of signs	<p>The standards also need to consider a minimum of clutter in signage and the space around signs, so that the symbols are clear and the passenger finds it as easy as possible to navigate seeking information, an exit or a toilet and does not make a mistake. Many people with haemophilia, for example, have mobility problems and it takes a longer time for them to cover the ground. For someone with a physical disability who moves slowly, mistakes can cost a lot of time and cause unnecessary pain and fatigue. They may have to rush and injure themselves or miss their train or bus if they are confused and go to the wrong location.</p> <p>Information signs need to indicate clearly where to find information and whether it will be a human providing assistance or a static information board or map.</p> <p>Signs need to be readable in the line of sight, no matter where you are located, for example, sitting down in a wheelchair or seat or standing.</p> <p>Signs indicating that there is no exit via a specific corridor or route also need to be placed clearly at a suitable point at the entrance so that a passenger does not mistakenly go down a route where there is no exit.</p> <p>Clear signage also impacts on traffic flow and has benefits for all passengers.</p> <p>Having clear and simple signage not only reduces the stress to passengers but also the call on public transport staff having to deal with an agitated passenger who is confused or has missed a connection.</p>

Reform area	Response
<p>Accessibility of signs and symbols: Letter heights and luminance Location of signs (cont.)</p>	<p>Bus and tram stops, train stations: need to show bus, train and tram numbers clearly in static and live displays, and when there are changes to the service such as delays, cancellations, changed stop locations.</p> <p><b>Technology and buying tickets</b></p> <p>There needs to be information at a train station or bus/tram stop about how to buy a ticket. This is valuable for both people with disabilities and for older people who have difficulty with machines and need assistance to purchase a ticket.</p> <p>This includes:</p> <ul style="list-style-type: none"> <li>• Information about what to do if you need assistance at a train station when there is no ticket office and only a machine.</li> <li>• An indication on online services that a train station does not have staff available.</li> <li>• Advice ahead of time if ticket purchasing systems are changing and how to navigate the changes. This could be both online or via email and through signage at the station or on the train/bus/tram. It would also be valuable to have pamphlets available for those who prefer print information.</li> <li>• Staff providing assistance need to be clearly identified, along with clear signage about an assistance point or where to find them, similar to Japanese systems.</li> </ul> <p>The way technology works is not necessarily intuitive and sometimes is not functioning.</p> <ul style="list-style-type: none"> <li>• Digital systems need to assume that users will make mistakes and only take them back one screen to repeat the action correctly.</li> </ul>
<p>Mobile web systems Accessible fare system elements.</p>	<p>Standards need a requirement that these systems are simple and easy to use as well as accessible. This should be required in the standards. When there is consultation for development, this should include people with disabilities who can advise on the practicality and implementation of specific enhancements.</p>
<p><b>Arriving at and waiting for public transport</b></p>	
<p>General issues</p>	<p>The standards also need to include cover at open bus or tram stops, eg to protect against rain or hot sunshine.</p> <p>As a standard, doors should be sensitive to passengers in the doorframe, so that if someone in a wheelchair has only entered halfway, they automatically reopen and do not injure the person in the wheelchair or anyone helping them.</p>
<p>Lifts: Braille, tactile and audible information Lift specifications and enhancements</p>	<p>Standards need to include audible, visual and tactile information.</p> <p>Standards also need to address the calibration of closing of lift doors to accommodate people who can only move slowly and may be unsteady and fall if touched by the lift doors.</p> <p>It would be valuable for the audible information to indicate the level and what is at that level, eg street exit, platform for a particular line; similar to lifts in government offices</p>
<p>Lifts: emergency communication systems in lift cards</p>	<p>The Emergency Contact system needs to be obvious and simple and standard across all lifts so that it is familiar to travellers. It should include simple instructions on how to use it.</p>
<p>Road crossings to access public transport</p>	<ul style="list-style-type: none"> <li>• While it is important to provide safe access to public transport when it involves crossing a road or tram/train track, providers should only be required to provide the safe access at that point. Passengers need to be made aware that they have responsibility to cross at the designated crossing point.</li> <li>• At crossings gaps should be made as small as possible</li> <li>• Designated crossings need to be clearly identified.</li> </ul>

Reform area	Response
Resting points	These points need to be an adequate indentation in an access path, so that traffic flow can continue and also so that the person using a mobility aid (including a wheelchair) is not going to be knocked about by other foot traffic.
Handrails	At a minimum, handrails should be provided on both sides of an overbridge or subway. It may also be helpful to have them in the middle if the passage is wide.
Allocated spaces and priority seating in waiting areas	Designated disability seats on public transport need to provide enough room for legs to be stretched out if the person cannot bend their knees. Placement of the seats must take this into consideration. Seats need to be parallel to the wall. If seats are facing out into the aisle, the person's legs will be in the traffic area and other passengers will kick them or trip over them. Currently this often means a person with knee stiffness will stand on a bus as there is no appropriate seating, which may be painful and fatiguing for them.
Accessible toilets	It will be important for emergency call buttons to be reachable for a person who has fallen on the floor as well as one who is on the toilet seat. Falling in a toilet is a common occurrence and may occur if a person is unwell or collapses as well as by accident, and they may need help with medical assistance as well as being assisted to stand or return to the wheelchair.
Escalators and inclined travelators	Escalators and inclined travelators need adequate space for someone to stand next to the person for stability or otherwise to assist them
Lighting	Adequate lighting for safe navigation is also essential.
Ramps and stairs for buses and trams	<ul style="list-style-type: none"> <li>• The elevation of the ramp can be a barrier for people in a wheelchair or on crutches or using a walking stick</li> <li>• If there is an incline, there needs to be a supportive railing as well</li> <li>• if people with disabilities climb a ramp or stairs on a bus or tram too quickly because they feel rushed or the driver starts moving, they can risk falling and being injured.</li> </ul>
Portable boarding ramp edge barriers	A requirement for ramp edge barriers would be valuable as sliding off the ramp does occur at times.
Boarding ramp and removable gangway definitions	It makes sense for ramps and gangways to be used as terms to define use onshore versus over water as they have a different design and are used in different situations.
Nominated assistance boarding points	There also needs to be a means by which the person travelling can request assistance with boarding before they travel, eg online or by telephone
Mobility boarding points Accessible taxi ranks Accessible passenger loading zones and parking spaces	It would be valuable for standards to be created and required for all designated disabled parking spaces or passenger loading zones. The parking at drop-off zones and disabled spaces is sometimes only a standard car space and is not adequate or safe for someone with a disability to exit or enter the car. They need to provide enough space for the person with the disability not to be rushed or buffeted in the process of getting in or out. The standards also need to require adequate space on either side of the vehicle.
Mobility aid movement in allocated spaces: restraints	Restraints need to be practical and simple to use, so that the person with the disability can attach and detach it themselves.
Appropriate seats on booked services	Standards for booking systems need to enable the person with a disability to select and book seats that are relevant to their specific requirements, eg for stiff knees as compared to being in a wheelchair. It is important that priority is also given to people with a physical need for these types of seats, eg extra leg room because of disability or height etc.
Conveyance dwell time at stops	There needs to be adequate time for people with a disability to sit down after boarding a conveyance. A bus or tram driver waiting until all are seated before starting seems to be a standard practice already. This may also need to be addressed in trains as well.
Luminance contrast of grab-rails	It is important for grab-rails to be clearly defined; however, this may be by contrast to its surroundings and a different colour may not be necessary, eg if a grab rail is bright metal and the surrounds are a dark colour.

<b>Reform area</b>	<b>Response</b>
Door contrast and height	It would be valuable to have standards for safe height and for a clear definition of the edges of a door, especially between areas or in departure points.