



Deaf Australia's submission to the 2022 Review of the  
Disability Standards for Accessible Public Transport  
2002

## About Deaf Australia:

Deaf Australia acknowledges the Traditional Owners and Custodians of the lands on which we work and pay our respects to Indigenous Elders past and present. Sovereignty has never been ceded. It always was and always will be, Aboriginal land.

We recognise the past atrocities against Aboriginal and Torres Strait Islander peoples of this land and that Australia was founded on the genocide and dispossession of First Nations people. We acknowledge that colonial structures and policies remain in place today and recognise the ongoing struggles of First Nations people in dismantling those structures; and especially that of Deaf, Deafblind and hard of hearing First Nations peoples.

Deaf Australia was founded in 1986 as a not-for-profit organisation that represents all Deaf, Deafblind, and hard of hearing people, and others who are fluent and knowledgeable about Auslan. The focus has and continues to be on developing access to information and accessible communication. We work with Australian governments and collaborate with key stakeholders to make sure that Australia complies with the United Nations Convention on the Rights of Persons with Disabilities. The UN Convention and the National Disability Strategy guides our work; we aspire to achieve equity for Deaf people across all areas of life.

Deaf Australia advises that this document may be publicly distributed, including by placing a copy on our website.

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## Introduction:

Public transport in Australia can range from the good, to the bad, to the downright dreadful and dangerous for Deaf individuals. The Deaf community is diverse and so, the experiences of accessibility are heterogeneous. Deaf Australia is pleased to be able to respond to the 2022 Review of the Disability Standards for Accessible Public Transport (2002) by providing a submission into our perspective as public transport users here in Australia. Public transportation plays an essential role in fostering inclusive and accessible societies. Its role as an enabler of eliminating some forms of discrimination cannot be underestimated.

At the same time, there is burgeoning frustration that despite three reviews to date nothing has changed for the benefit of Deaf people. Technological advances have rapidly marched across these three reviews; yet these advances have not been incorporated as part of making Australian public transport first class. Australia has legislation and regulations in place, such as the Disability Discrimination Act 1992 and the Disability Standards for Accessible Public Transport 2002, which aim to prevent discrimination against people with disabilities. Australia also is a signatory to the Convention on the Rights of People with Disabilities (2007). These standards set out requirements for public transport providers to ensure accessibility. However, over time, there is demonstrable evidence that the existing standards are not comprehensive enough and as previously mentioned, fail to keep up with evolving technologies and best practices. Enhancements to the Disability Standard would help meet legal obligations and ensure that public transport services comply with current accessibility standards.

Australia lacks the initiative and motivation to improve public transport standards for those with a disability and for those who are Deaf. It's a strong statement yet reflective of the reality that, despite three reviews already into the standards nothing has changed and there is no genuine desire to change the status quo. On the international stage Australia is a poor second cousin; in Sweden, for example, a small city by the name of Jonkoping is one of the most accessible cities in the world because of its inclusive and bottoms-up approach. Their version of a local government council worked closely with disability organisations to make their public transport as disability accessible as possible. Why do we not have the same in Australia?

The experiences of Deaf individuals using public transport are often marred by numerous challenges and barriers. It does not improve the situation when the Standard itself is a legally binding set of regulations set by the Attorney-General under the Disability and Discrimination Act (*C'wth 1992*) yet it is difficult to, if not impossible, to monitor compliance with the Transport Standard because the Standard does not include national reporting requirements. Public transport operators and providers must comply with the Transport Standard, yet it places the onus of compliance onto those who **use** public transport.

Please note that when we use the terminology of 'Deaf person/people/community' to refer to all d/Deaf, Deafblind, and hard of hearing people who use Auslan as their language of preference, unless otherwise stated. Deaf Australia writes broadly about signing Deaf people, yet recognise that Deaf people are intersectional beings, and that this paper was written by a white Deaf person, so important nuances covering Aboriginal and Torres Strait Islander Peoples, BIPOC and all other intersecting identities are likely to be missing from this paper.

## Emergency Warning Systems:

The lack of technological advances in emergency systems in public transport hubs and buildings are appalling. Use of public transport can be dangerous and life-threatening precisely because of a careless 'she'll-be-right' attitude that ignores this fact and because of this lack of active, preventative approach towards monitoring and enforcement of compliance with the Transport Standard. Having access to equitable real-time information can save someone's life in an emergency. In the Standard it is outlined as thus:

### Emergency warning systems

- (1) If installed, emergency warning systems must comply with **AS1428.2 (1992) Clause 18.2.1, Emergency warning systems, Clause 18.2.2, Audible alarms, and Clause 18.2.3, Visual alarms.**
- (2) Provision must be made for people with vision impairment to locate the exit path in the event of an emergency

This section is problematic for several reasons: the use of the word 'if' suggests compliance is optional rather than mandatory – it should be '**when**' emergency warning systems are installed. There are **no clear, easily within sight visual alarms** installed across the country in any public transport area to be used when there is an emergency. None. There are no provisions made for Deaf people who use Auslan and there should be; at present this means that every time a Deaf person boards a form of public transport, they are risking their lives when they do.

We have anecdotal evidence of Deafblind people falling off train platforms because they thought their train had arrived, but it was a train on the opposite platform. It is difficult to access emergency systems when violence occurs on public transport. How is it possible for a Deaf person who uses Auslan to raise the alarm when they see or experience violence? Trains are a particular example – because they also spread large number of passengers out over many separate cars, this can make people vulnerable to abuse and violence during their journey. There is anecdotal evidence of

Deafblind people having been attacked whilst using trains to travel; we cannot overemphasise just how dangerous public transport can be for Deaf and Deafblind people.

### Physical Accessibility:

The physical infrastructure of public transport in Australia also presents significant challenges for deaf people. Many stations, buses, and trains lack visual indicators or tactile guidance systems that can assist individuals with hearing impairments. For example, visual displays announcing the upcoming stops or tactile paths to guide visually impaired passengers are often absent or poorly implemented. These design oversights create an environment that is inherently inaccessible for deaf individuals, making navigation and understanding their surroundings difficult and unsafe.

Buses can be good because of easy connection to the driver who is often a familiar face, and its patronage is a smaller total number of passengers. Yet they can be dreadful to access because of difficulties balancing whilst moving. Travelling by trams or light rail can be a better option compared to travelling by bus, by lessening issues with vehicle motions and balance, however the tram stops themselves are not easy to access. There are many elderly Deaf people who use mobility aids and walkers to get around.

Tram services in Victoria, for example, were audited to see if they were meeting the needs of those with mobility restrictions. They were found to be lacking; in 2018–19, only 15 per cent of tram services delivered a low-floor tram at a level-access stop. The Department of Transport (DoT) has not met legislated targets for accessible tram infrastructure and was not able to comply by 31 December 2022. Based on the trend to date, DoT is also at risk of not meeting the 31 December 2032 tram compliance requirement. This is an example of where the Standard is frankly useless at enforcing compliance – there are no clearly outlined consequences of non-compliance and nor does it outline how it monitors compliance.

Airports are chaotic at the best of times and bedlam at the worst. The impact of COVID19 cannot be underestimated; the airport and airline workforce are constantly in flux, and this affects their ability to be sensitive to the needs of Deaf and Deafblind people. Navigating large crowds of people with luggage who are frequently rushing from point A to point B is an invitation for a serious accident; Deafblind people are vulnerable to the very real possibility of an accident. If Deaf and Deafblind people use spoken language and are confident in this way of interacting, they can use guest services or concierge support whilst at the airport, yet this is not an opportunity for most to use. This is a very tiny fraction of the Deaf community who can do this. There are no captions available to inform in real time the update to services; there are no Auslan translation of announcements. Many Deafblind people need in-person support to navigate the airport and make it to/from their flights. They also need support to be updated about changes to the services before or after the flight, for example. Airline staff are rarely able to communicate with Deafblind people in these situations.

### Lack of Real-time Information:

There are many stories of Deaf people ending up where they never meant to go because they had boarded the wrong train or when there is a change in the route during the trip. This happens because there is no way to know what is happening when there are no clear, easily within sight, accessible real-time update to information. The Transport Standard outlines thus:

## Part 26 Hearing augmentation—listening systems

### 26.1 Public address systems — premises and infrastructure

If a public address system is installed, it must comply with **AS1428.2 (1992) Clause 21.1, Hearing augmentation.**

#### Premises

#### Infrastructure

except premises to which the Premises Standards apply

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### 26.2 Public address systems — conveyances

If a public address system is installed:

- (a) people who are deaf or have a hearing impairment must be able to receive a message equivalent to the message received by people without a hearing impairment; and
- (b) it must comply with **AS1428.2 (1992) Clause 21.1, Hearing augmentation.**

#### Conveyances

- Buses
  - Coaches
  - Ferries
  - Trains
  - Trams
  - Light rail
- 

This is only suitable for those who have sufficient hearing levels to be able to access information through the hearing loop. That's a very small fraction of the Deaf and hard of hearing population. Announcements regarding delays, changes in schedules, or disruptions are predominantly conveyed through audio announcements or public address systems, making it inaccessible to Deaf passengers. Trains and train stations and buses and airports have the same issues when it comes to giving real time information about changes to services. Most of the time this is done by audio only and if there is any visual update it is just print on a screen that says, "listen for announcements". The absence of visual or text-based alternatives, such as electronic signage or mobile applications, significantly hampers the ability of deaf people to navigate the public transport network effectively. The above statement in 26.2 (a) clearly states that people who are deaf must be able to receive a message equivalent to the message received by people – why is there no Auslan translation

available? Why are there no clear and visual messages to let Deaf people know what's happening in the here and now?

### Limited Communication Support:

Another significant challenge faced by deaf individuals is the scarcity of communication support on public transport. Deaf people often rely on Auslan interpreters, Auslan translation videos, captioning services, or written communication to effectively interact and comprehend information.

Unfortunately, public transport services in Australia rarely provide such services, leaving deaf passengers isolated and reliant on their own resources. This lack of communication support limits their ability to seek assistance, inquire about routes, or report issues faced during their journey.

## Part 27 Information

### 27.1 Access to information about transport services

General information about transport services must be accessible to all passengers.

| Conveyances | Premises | Infrastructure |
|-------------|----------|----------------|
|-------------|----------|----------------|

### 27.2 Direct assistance to be provided

If information cannot be supplied in a passenger's preferred format, equivalent access must be given by direct assistance.

*Note* See sections 33.3 to 33.6 in relation to equivalent access and direct assistance.

| Conveyances | Premises | Infrastructure |
|-------------|----------|----------------|
|-------------|----------|----------------|

### 27.4 Access to information about location

All passengers must be given the same level of access to information on their whereabouts during a public transport journey.

The Transport Standard outlines how information needs to be conveyed – it needs to be accessible to ALL public transport users. That includes Deaf people. We have already outlined issues with real time announcements and updates. Other specific issues contributing to the lack of communication for Deaf people on Australian public transport include:

1. Inadequate Visual Information: Visual displays or signage providing essential information, such as route maps or real-time updates, are sometimes lacking or not clearly visible in public transport vehicles and stations. This makes it difficult for Deaf individuals to gather relevant information independently.
2. No Auslan translation videos available to make announcements or updates – these videos can be easily made and displayed to alert Deaf people of changes to routes, construction works delay, platform changes, for example.

3. **Absence of Closed Captioning:** Visual displays or video screens on public transport vehicles often lack closed captioning, which prevents Deaf passengers from accessing important information shared through visual media.
4. **Limited Accessible Communication Channels:** Alternative communication channels, such as text-based messaging services or mobile applications, which could provide real-time updates and enable direct communication with public transport authorities, are not widely implemented or promoted.
5. **Insufficient Awareness and Education:** Awareness about the communication needs of Deaf individuals among the public, including fellow passengers, can be limited. This can lead to a lack of understanding and difficulties in communicating effectively with Deaf passengers, further exacerbating the barriers they face.

### Inadequate Training for Staff:

The training provided to public transport staff in Australia is often inadequate when it comes to deaf awareness and communication strategies. Many employees may lack the knowledge and skills necessary to effectively communicate with deaf passengers or provide appropriate assistance. This deficiency in training exacerbates the barriers faced by deaf individuals, leading to a lack of understanding and empathy from staff members, further isolating and discouraging their use of public transport. We know and acknowledge that in Victoria public transport staff have attended Deafblind Awareness workshops and continue to send staff to these and show an active interest in building their knowledge and capacity around providing services to Deafblind people. This is the exception to the rule, however.

Taxis and rideshare transport easily lead other forms of public transport when it comes to active discrimination. It is unfortunate and unacceptable that some taxi and rideshare drivers refuse to provide service to Deaf passengers, especially Deafblind passengers. Such discrimination goes against the principles of equal access and equal treatment. Deaf individuals have the right to use public transportation services, including taxis, without facing discrimination.

Taxi and rideshare drivers do not seem to understand that discrimination based on disability is illegal. It is crucial to raise awareness about the rights of Deaf individuals and promote inclusivity in the taxi and rideshare industry. Taxi and rideshare companies should provide training to their drivers on disability rights and ensure that they understand their obligations to serve all passengers without discrimination.

Additionally, public education campaigns can help increase awareness among both drivers and the public about the rights of Deaf individuals and the importance of equal treatment and accessibility in transportation services.

### Insufficient Consultation and Representation:

We note the example of Jonkoping in Sweden, where they created a truly inclusive and accessible city because of its bottoms-up approach and close consultations with disability organisations. Deaf people and organisations advocating for their rights are often overlooked in the decision-making processes regarding public transport. The absence of meaningful consultation and representation leads to a lack of consideration for the unique needs and experiences of Deaf individuals. As a result, policies, procedures, and infrastructure developments often fail to address the barriers faced by Deaf people, perpetuating the cycle of inadequate accessibility.



## Recommendations:

Based on our submission, we thereby propose the following recommendations:

1. Close consultation with Deaf Australia in improving the Standards and incorporating features that are genuinely accessible and would be most likely used by Deaf public transport users.
2. Incorporating clear monitoring and compliance outcomes in the Transport Standard should public transport systems fail to implement accessible features.
3. Auslan Interpretation and closed captioning: In certain situations, providing Auslan interpretation and closed captioning on video screens and during audio or video announcements can significantly improve accessibility for Deaf passengers.
4. Visual Information Displays: Clear and visible visual displays of information, such as route maps, arrival and departure times, and announcements, can greatly assist Deaf passengers. These displays should be well-placed, easily readable, and provide real-time updates.
5. Digital Signage and Electronic Boards: Implementing digital signage and electronic boards that display relevant information in text or visual formats can enhance communication and ensure Deaf passengers receive important messages regarding delays, platform changes, or service disruptions.
6. Real-Time Communication Systems: Providing real-time communication systems, such as text-based messaging services or mobile applications, allows Deaf passengers to receive instant updates, seek assistance, or communicate with staff when needed.
7. Accessible Ticketing and Information Services: Accessible ticketing machines and information kiosks equipped with visual interfaces or touchscreens that support alternative communication methods, like text or images, can improve independent access to public transport services for Deaf individuals.
8. Visual and Vibrating Alerts: Installations of visual and vibrating alert systems in public transport vehicles and stations can ensure that Deaf passengers are aware of important announcements, emergency notifications, or stops.
9. Accessibility Training for Staff: Providing comprehensive training to public transport staff on effectively communicating with Deaf individuals, understanding their needs, and using basic sign language or alternative communication methods can enhance the overall experience for Deaf passengers.

Advances in technology can lead to new and improved accessibility solutions for Deaf individuals in public transport systems and at a reasonable cost. Regular consultations and feedback from the Deaf community can also help identify specific needs and drive ongoing improvements to make public transport more accessible for Deaf passengers.

## Conclusion:

The state of public transport in Australia for deaf people remains far from satisfactory. The lack of real-time information, limited communication support, inadequate staff training, physical accessibility, and insufficient consultation all contribute to the challenges faced by deaf individuals when utilizing public transport. To foster inclusivity and equality, urgent action is required to rectify these issues. By implementing visual displays, improving staff training, and involving Deaf individuals and organizations in decision-making processes, Australia can take significant strides towards creating a public transport system that is truly accessible to all, irrespective of hearing.

