



Submission on the 2022 review to the disability standards for accessible public transport

June 2023

Executive Summary:

Hireup is pleased to express our support for the Australian Government's 2022 Review of the Disability Standards for Accessible Public Transport 2002 (Transport Standards) and its overarching goals. We hope to contribute to the development and enhancement of future reviews as they are rolled out over the next few years.

In the following submission, we would like to offer our support for some of the existing efforts to increase awareness of how to best support people with disabilities on public transport, and also share the views of our community on some of the key challenges preventing a fully accessible journey. These include public transport education and awareness campaigns for people with disability on how to board public transport, emphasising the importance of time management, understanding boarding procedures, and identifying available assistance. The implementation of a National ID card system that identifies a person as having a disability and therefore needing additional support. Ensuring accessible transport is available throughout the day, alongside clear announcements, readable posters during disruptions and a streamlined accessible complaints mechanisms are crucial. These efforts will start to create an inclusive and supportive public transport environment that meets the needs of individuals with disabilities.

Hireup is committed to actively participate in the implementation of this review. We welcome the opportunity to engage in the review process and look forward to continuing to contribute to any future consultations.

Introduction

The Hireup story started with Jordan and Laura O'Reilly in response to their lived experience growing up alongside a brother with disability. Managing support workers was a regular part of their family routine. Sometimes the support workers were a great fit for their brother but more often than not, they were not.

While he was at university, Jordan became a disability support worker and he discovered that not only was the system broken for people with disability, it was also broken for the support workers operating within it. It was with this deep and personal insight that Laura and Jordan saw opportunity for change. The result: the creation of Hireup - Australia's first online disability platform.

In 2015, Hireup entered the market offering a new model for NDIS service provision, allowing NDIS participants to choose their support workers using the Hireup platform. Hireup's innovative approach did not end there. Jordan and Laura wanted their platform to be as responsible, accountable and safe as possible. To demonstrate the seriousness of their commitment, they built a platform that is both NDIS-registered and which employs its support workers. This makes Hireup one-of-a-kind in the support worker platform market. No other support worker platform is both NDIS-registered and provides its platform workers employment. Hireup does this to ensure the full range of NDIS safeguards are applied to its work, with oversight from the NDIS Safety

and Quality Commission. Hireup also does this to ensure support workers have better working conditions and to exert responsibility for their actions to protect NDIS participants.

Hireup's platform has been embraced by the community and now supports over 10,000 clients with disability and employs over 10,000 support workers.

At Hireup, we are committed to ensuring that the voice of our community is at the heart of everything we do. We believe that the best way to deliver a service that meets the needs of our community, is to work together with our community. In preparing this submission we consulted with our Community Advisory Group (CAG), which is a forum to enable a diverse group of people in the Hireup community to provide input and feedback on projects and initiatives on a regular basis. Community Advisors include representatives from Hireup's clients, account managers and support workers.

The CAG is very important to Hireup - it enables our Support Office staff to connect with passionate and knowledgeable community members, to seek their input across a range of initiatives. The CAG also aims to support and invest in future leaders within the disability community, and give opportunities for learning and professional growth.

Community Advisors are Hireup clients, support workers and/or account managers who:

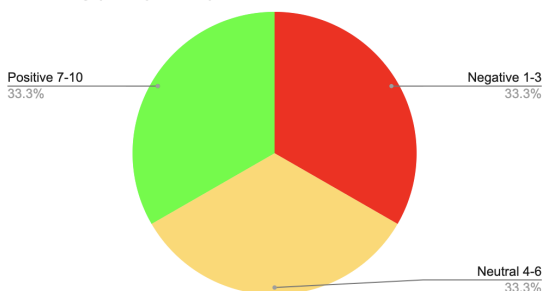
- Have actively used Hireup on a regular basis for 6 months;
- Are very engaged with Hireup's mission;
- Are enthusiastic about making a meaningful contribution to improving how Hireup delivers services to our community;

The following recommendations are based on the five issues highlighted in the 2022 standards review.

Planning your journey - What is your experience supporting people with disability, including their family and carers, to plan a public transport journey? Do the Transport Standards provide sufficient clarity to enable your organization to remove discrimination for people with disability when planning a public transport journey?

The experiences reported to Hireup show diverging levels of satisfaction with public transport planning. Overall, however, it was agreed that more needs to be done to provide adequate support for trip planning. Our organisation provides disability services but does not provide public transportation, so we cannot comment on the clarity of the Transport Standards and their impact on removing discrimination from the organisational perspective. We have instead chosen to focus on the customer experience in journey planning. Of the sixty-six responses, twenty-two responded that they had positive experiences with planning their public transport journey (33.3%), twenty-two neutral (33.3%) and twenty-two negative (33.3%).

Planning your journey



Our community made three key points on trip planning, that we have included below.

Firstly, service connections do not always permit streamlined journey planning. Some participants have noted that there is insufficient connectivity between services which can affect their journey planning and add on significant commute time. For instance, a person who uses a wheelchair may find it takes longer to change modes of transport, platform, bus stop, etc. As a result this can create unnecessary inconveniences and extended wait times which results in people with disabilities avoiding the use of public transport entirely. Infrequent services can further exacerbate the problem, with unreasonable journey times as a reason to avoid the use of public transport altogether.

Secondly, there are additional pre planning requirements that are often more onerous for people with disability. When there are lift outages, limited communication regarding delays, trackwork and replacement buses, people with disabilities are significantly affected by these inconveniences.

One Hireup user said it would be helpful to have information at stations when lifts are out of service or where you can find alternative lifts, as apps such as tripview do not provide that information. One Hireup user identified a time when:

There was trackwork and I needed to take 2 trains to get to Town Hall station, one of the recommended changes was to change at Redfern station which is not accessible as there are no lifts; I was lucky I could change my plans and not go into the city that day.

Another user with a physical disability expressed their frustrations with planning their transport journey. They found if they turned up to a train station two minutes before a train's departure, they would find themselves mostly being unable to board the train as the station masters and train guards would not communicate to each other in time. That is not including the times where the user was unable to locate any train staff. The same user also highlighted the need for accessible journey time estimates to be included as a primary feature on public transport apps. There was also a suggestion by another user to have a button on the train station platform to alert staff if assistance is needed, this could speed up communication and prevent these train "near misses" from occurring.

There was consensus amongst the group that there needs to be more education provided to people with disabilities in the areas of allowing sufficient time to arrive at a train station and how

to board. These education sessions would be very helpful and increase a step towards building their confidence and complete inclusion. Having transport bodies taking the leading step in promoting this inclusivity is vital to encouraging others to get behind this change. Other areas of education can include a compulsory training model for all transport staff and access to education materials for commuters regarding how to best support someone who has a disability on public transport. Transport for NSW's recent invisible disability campaign was a strong example of what this can look like in practise as it provided education to staff who could stand in solidarity with people with invisible disabilities however they were also able to raise awareness within the community providing the invisible disability bracelets that commuters could pick up.

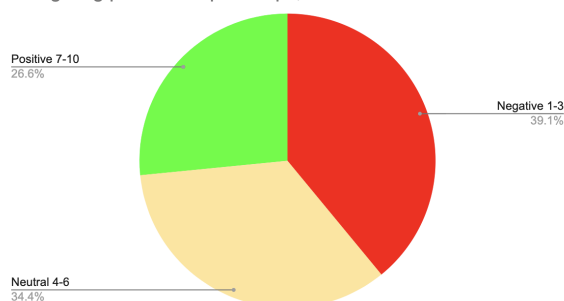
Thirdly, when planning a journey people with disability rely on the service information being accurate and in real time. Most commuters access transport information through digital applications and online websites, when these are not updated regularly or presented in an accessible format this can cause significant challenges for a person with disability mapping out their journey. One of our participants noted that understanding which stations are affected by trackwork can be particularly difficult as this information is not regularly updated in an accessible format. Many of our participants have additional challenges that make it difficult to interpret changes. For example a person who is hearing impaired will not be able to hear announcements on board transport or on the platform and may choose to rely on their device for updates which is why it is critical for digital and online platforms to be refreshed in real time. The updates also need to be inclusive to everyone for example a person with a vision impairment may not be able to see the updates that are taking place on board and may rely on announcements, for this reason it is imperative for both digital applications and online websites to provide accessible communication as many people with disabilities rely on these forms of updates. It should also be noted that the information provided about buses on digital applications and online websites is very limited. In particular the older models of buses don't have any way of providing real time updates for things such as number of passengers on onboard, arrival and delay times and live location updates. Multiple Hireup users have commented in our surveys that a lack of announcements on buses have led people to boycott this mode of transport altogether.

Public transport stops, stations or terminals – What is your experience supporting people with disability, including their family and carers, at public transport stops, station stops, terminals, wharfs and other boarding locations? Do the Transport Standards provide sufficient clarity to enable your organization to remove discrimination for people with disability arriving and waiting to board?

Levels of customer service satisfaction towards public transport differ among Hireup's users. Hireup understands through consultation with our CAG that the current design of public transport stations, stops and terminals can impact the customer journey for people with disability. The level of accessibility also plays a major factor in determining the overall levels of satisfaction for users.

Our survey of Hireup users found that 39.1% of respondents viewed navigating stations, stops and terminals to be a negative experience, 34.4% of respondents held a more neutral view whilst only 26.6% of respondents disclosed a positive view on navigating stations, stops and terminals. These findings would tend to suggest that the Transport Standards do not appear to currently adequately remove discrimination for people with disability.

Navigating public transport stops, stations and terminals



Our community made three key points on this issue, noted below:

Firstly, the need to rely on others for assistance with basic commuting needs. Many of our users have commented feeling their independence is being stripped when they are “relying on members of the public to assist them with things such as using the elevator and their overall navigation of public transport and platforms. Multiple respondents commented on the “lack of confidence” they felt when having to find a staff member to assist them with boarding a transport service, which resulted in frustration when they wouldn’t arrive at their destination at their desired time. Comparatively, other modes of transport such as ferries have been found by some community members to be more easily accessible, when tides are low. However, this same user noted that they have never once seen a ferry staff member give them priority access to boarding the ferry. In order to fulfill the desired “necessary amendments to the Transport standards” it is crucial that reminders of priority boarding be implemented in any suggestions of changes to the transport standards.

Secondly, the **lack of accessible public transport** available at differing times of the day was a major challenge for most people. One user commented they had to often “wait for multiple buses to pass” before a wheelchair accessible bus would arrive. Another person who uses a wheelchair mentioned the uneven ground that needed to be traversed in order to access the station platform as being another major barrier of using public transport. This is a direct contradiction of the Transport Standards Purpose to “eliminate discrimination” for people with a disability.

One of our CAG members praised the accessibility of the Sydney metro, highlighting that the boarding process on the Sydney metro services is easy, user friendly and made them feel “empowered to have the freedom to get off and get on whenever and wherever I wanted”. They did however find it difficult boarding newer NSW Waratah trains whereby the guard compartment has been moved to the rear of the train, as opposed to the middle of an eight

carriage train. This is a significant impact as station staff would be required to walk an additional 20 meters down the end of the platform to let the guard know where she wishes to get off, and with the guards now at the other end of the platform it is difficult to ask for help.

Thirdly, the **level of noise** on public transport stations, stops and terminals with overstimulating information which can be difficult for some users with hidden disabilities such as autism to fully process crucial information. We particularly praise the “Hidden Disabilities” sunflower campaign developed by Transport for NSW, which saw Sydney Trains customers trained to recognise the sunflower and provide extra support to wearers. This support can include:

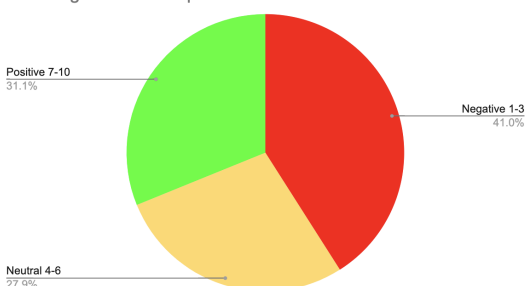
- Ensuring enough time to get on and off train stations
- Help navigating through busy train stations
- Support during disruptions and travel changes
- Help finding quiet spaces as needed.

This recognition allows for a subtle way of displaying acceptance and standing together with those who have an invisible disability. This movement towards acceptance is an outstanding step in line with the Transport Standards Act in order to prevent invisible discrimination on public transport services. The CAG identified in our survey that it would be helpful for them to have an ID card that's nationally recognised to help identify people with disability that need extra support in situations on public transport. The hidden disabilities sunflower on NSW transport is a positive step in the right direction but there is still more to be done in the form of identifying how to support people with disability on a national scale.

On-board the public transport service – What is your experience supporting people with disability, including their family and carers, during a public transport journey (on the vehicle). Do the Transport Standards provide sufficient clarity to enable your organization to remove discrimination for people with disability during a public transport journey?

Many users reported difficulty once on board a public transport service. There are currently high levels of dissatisfaction, largely due to poor layout design of transport services. With the Transport Standards being established to “enable Australians to participate in the community”. With discrimination occurring when equitable access is not afforded, it is concerning that these issues remain unrectified. On-board a public transport service has presented increased levels of challenge for some users, whilst other users have been able to easily identify positive experiences they have had with public transport services. In the community members surveyed, 41.0% reported having negative experiences on boarding public transport, compared to 27.9% responding with neutral experiences and 31.1% responding with positive experiences.

Boarding Public Transport



Firstly, differing experiences have been reported regarding various difficulties around accessibility of modes of transport. One user identified that having a gap between the train and the platform found it particularly difficult for them having a mobility walker. Multiple wheelchair users have commented on the overall inaccessibility inside a bus service. One wheelchair user said he “avoids buses altogether” and another commented that they find bus travel stressful due to the inability to see the direction the bus is taking therefore being unable to brace themselves. They have also found themselves unable to press the stop button on the bus to get off and have to look at Google Maps to see where they need to go. Another member of our CAG has highlighted the difficulty in trying to hail down a bus, particularly if they are moving quickly.

Secondly, it was highlighted that onboard public transport services the quality of the audio announcements can sometimes be muffled to the point that you cannot hear them. This raises significant concerns as audio announcements are heavily relied upon by some people with disability. Missing the messaging can result in extreme delays or disruptions on their transport journey. One user with a vision impairment mentioned that they rely on the audio announcements as their sole means of interpreting what is happening on their journey, and when these announcements are muffled it creates confusion and in some cases this user was getting off at the wrong station because the muffled announcements caused a miscommunication. Another commuter with impaired hearing described announcements as their sole means of working out what is happening on a transport journey, when the announcements are muffled it is “highly frustrating” and shared in the survey a time where they had disembarked at the wrong station as a result of a muffled announcement and no visual communication onboard.

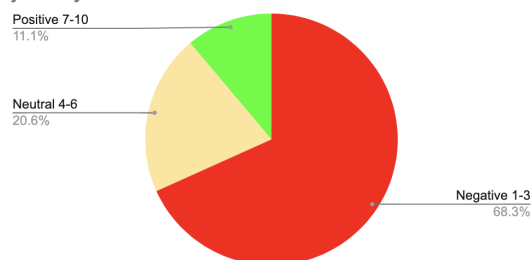
Disruption to your journey – What is your experience supporting people with disability, including their family and carers, with planned and unplanned disruptions to the usual operation of public transport. Do the Transport Standards provide sufficient clarity to enable your organization to remove discrimination for people with disability during planned and unplanned disruptions?

Supporting people with disabilities when disruptions to planned journeys occur has been proven to be extremely difficult due to inaccessible communication of disruptions to public transport services. The Transport Standards outline that barriers can occur when there are limitations for people with disability unable to travel independently. These barriers will lead to inconvenient

inaccessibility, whereby many individuals with disabilities will avoid public transport services altogether finding these services too difficult to access.

Our survey of Hireup clients found that this area of managing planned and unplanned disruption was the most dramatically impacted. A massive 68.3% of users surveyed reported negative experiences on managing their public transport journey, with 20.6% reporting a neutral experience and only 11.1% reporting positive experiences.

Managing planned and unplanned disruptions to your journey



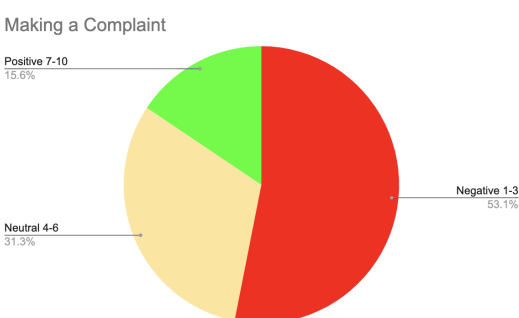
Firstly, a strong identified issue was the lack of accessible communication around public transport disruptions. Our community advisory group expressed that there are several barriers impeding their ability to access public transport services with ease. One of these was around the yellow sign boards that are used at Sydney train stations to communicate trackwork. Discussions found that these boards, whilst good for general communication, were not readable from a distance away for people with vision impairments and alternate messaging methods should be considered and implemented.

Secondly, the impact of unplanned disruption to everyday life proved to be a major barrier to accessing public transport. For some people with disability, driving is not an alternate option and when a major unplanned disruption occurs, it can leave them out of pocket and largely inconvenienced. Whilst unplanned travel disruption is inevitable, it is important to highlight the impact that this can have on a person with disability. One user highlighted to us being left out of pocket hundreds of dollars after being stuck when trains were suddenly canceled on their line when urgent track repairs needed to be carried out and they had no other means of traveling to their appointment.

Thirdly, the need for accessible means of training around communicating with people with disabilities when on the front line. As our survey has indicated that 68.3% of Hireup clients have had negative experiences whilst on public transport it can very likely be drawn that had communication been better then that score would have been significantly lower. As mentioned previously, the lack of infrastructure on public transport including lack of Passenger Information Display Screens inside some models of trains, but also lack of audio announcements at some bus stops and only a print out timetable, means that inaccessibility is paramount.

Complaints – In the past five years, have you received any complaints from passengers that said you were not meeting your obligations under the Transport Standards? How did you address these concerns?

Throughout this consultation the one topic that keeps coming up that inter-links with all the other discussion points has been around when issues arise like the ones we have discussed earlier, how do you effectively make a complaint? Under the Transport Standards Act, there has been a strong desire to see fair and equitable complaints mechanism services, however from the consultation with our community they felt a lack of trust with existing complaint resolution mechanisms. Our survey of Hireup clients found that 53.1% of clients had reported negative experiences when making complaints, compared with 31.3% of clients having neutral experiences and 15.6% of complaints reporting a positive experience with making complaints.



Firstly, the complaint mechanism process has been widely criticized. The Public Transport Standards outlines the complaints process for making a formal complaint “if a person believes a public transport operator or provider is not complying with the Disability Discrimination Act or transport standards, they can make a complaint to the Australian Human Rights Commission (AHRC)”. The discussion paper includes a link to an Auslan presentation of how the complaint process works, which is a great step towards furthering accessibility. However, our community advisory group, which incorporates individuals with a diverse range of disabilities, have expressed that the complaints process is “unhelpful and difficult to access”. One of our community advisory group members noted that:

“I don’t know where to make a complaint and I don’t have any confidence that suitable actions will be taken.”

This defeats the purpose of having a complaints system if nobody is confident in using it, particularly if many of the complaints are around a lack of accessibility on public transport services. It could be helpful to highlight in future campaigns the changes that have been made from people who have made complaints whereby transport bodies have listened and implemented these changes.

Secondly, the issue of escalation in making a complaint has been widely noted. One member of our community advisory group noted the overwhelming frustration they had faced in having to

rely on external contracts such as community groups, ministers or legal officers and judges to escalate their matters. Upon making this comment, many of our members expressed that they shared this frustration. Another member noted they felt “highly anxious” at any potential repercussions from There is a clear need for more accessible means of communication around the complaint making processes available, but also educating on the importance of treating providing a complaint as a “constructive” process that will make real, lasting improvements.

Recommendations

To ensure accessible transport for all Australians the following recommendations have been identified to address the existing challenges. These recommendations aim to improve communication, education, awareness and support for people with disabilities using public transport services. By implementing these measures, we can foster an inclusive environment for all passengers.

- 1) The addition of a button on train station platforms to alert staff if assistance is needed in order to speed up communication and prevent near misses of catching the train occurring.
- 2) Additional education for people with disability around the importance of allowing sufficient time to arrive at a station, and how to board and where help can be easily identified.
- 3) Accessible public transport **at all times** of the day.
- 4) Continuation of campaigns around promoting awareness of how to support people with disabilities on public transport services - targeted at both transport staff and the general public.
- 5) The implementation of a National ID card that identifies a person as having a disability and therefore needing additional support. Implementation of campaigns (akin to the point above) will result in increased overall awareness of this.
- 6) Ensuring public transport announcements are clearly audible.
- 7) Accessible communication around public transport disruptions at all times, including ensuring that trackwork posters are readable for commuters with vision impairments.
- 8) Guaranteeing accessible complaints mechanisms to ensure the disability communities voices are easily heard.
- 9) Communication to people with disabilities around the changes that can come from making a complaint, including highlighting the changes that have been made as a result of people vocalising their complaints.