



Integrated disAbility Action (IdA)

A voice and support network for
people with
disability since 1996

Submission for the 2023 Review of Disability Transport Standards

Nightcliff Community Centre

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Who We Are

IdA: The Voice and Support Network for Territorians with Disability

Integrated disAbility Action Inc (IdA) IdA is a not-for-profit, charitable, grassroots organisation that was established in 1996 to offer independent advocacy to help empower people with disability and their families, carers and guardians, to improve the quality of their own lives and to look at and improve the professionalism of the disability sector in the Northern Territory.

IdA advocates for positive change on issues that affect the lives and rights of people with disability, such as access, inclusion, education, employment, health, housing and transport. IdA ensures that people with disability have an active voice and representation on various government and non-government committees and boards.

Every year, IdA organises the Carnival of Fun, a day of accessible games and fun activities celebrating diversity and appreciation for our community and recognising their leadership and contributions.

IdA also hosts the 'All Abilities Expo' is a unique and interactive event that connects disability service providers and people with disability, carers, guardians and families.

IdA is also the provider of the Companion Card in the NT, which allows people with disability to access events and activities with a companion at no extra cost.

Acknowledgements

IdA would like to acknowledge the Larrakia people, who are the traditional owners and custodians of the land on which we work today, and pay our respects to their elders past, present and emerging. As an organisation that empowers people with disability, improves the quality of their lives, and advocates for positive change, we are committed to working with Aboriginal and Torres Strait Islander peoples and communities to achieve equitable outcomes for all.

We would like to thank our Patron, life members, Board and valued members for their dedication and support to our organisation.

We value and appreciate the skills, talents and perspectives of people with disability in the NT, and the strength and resilience they demonstrate every day. We also recognise and support the efforts and involvement of their families, friends and allies in promoting their wellbeing and inclusion.

The Opinion of Integrated DisAbility Action Inc. NT

Summary of Recommendations:

The state of public transport in the Northern Territory in general is inadequate and without strict, mandatory standards and reporting it is unlikely to see any impact on the current discrimination of people with a disability who require public transport, other than increasing its frequency.

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Integrated disAbility Action NT strongly urges that Regulatory Options 3 be pursued in all parts of the Australian Disability Transport Standards 2002 review.

Summary of Issues:

Integrated DisAbility Action Inc. NT firmly believe that public transportation is an essential service and a fundamental right for everyone in the community, including those with disabilities. We aim to share our members' experiences and insights with the government's review and recommend policies and actions that will enhance the accessibility and inclusivity of public transportation for people with disabilities in the NT.

Unfortunately, we have witnessed and experienced the inaccessibility, unreliability, unsafety, and unavailability of public transportation for people with disabilities, particularly in remote and rural areas. In the NT, there are 72 remote communities and over 500 homelands without any form of public transportation, with around 10,000 people living on homelands and another 40,000 people connected to homelands.

Some of the issues that people with disabilities encounter when using public transportation in the NT:

- There are only two public transportation options (buses and a ferry), and they are only available in Darwin, Palmerston, and Alice Springs.
- Services are often limited, behind schedule, or cancelled without prior notice.
- Remote and Aboriginal communities have no public transportation options and rely on private, commercial, or chartered vehicles for travel.
- There are no fixed rail systems to connect suburbs and regional, rural, or remote communities in the NT.
- Public transportation infrastructure, vehicles, and practices are often inaccessible and unsafe, such as inadequate ramps, insufficient space, poor lighting, ventilation, temperature control, narrow doorways, high steps, no shelters, dangerous and poorly maintained paths, insufficient seating, restraints, or storage, and lack of signage, information, announcements, or assistance.
- Communication and information provision for public transportation users with disabilities are inadequate and unavailable, such as no or poor telecommunication services, limited translation of digital or physical information to other languages, and insufficient accessibility measures for information such as braille, easy-read iconography, and hearing augmentation systems.

We hope that our submission will assist the review and help achieve the Transport Standards' objectives.

Parts and Recommendations

Scope	IdA Recommendation
<p>Part 1: Transport Standards principles</p> <ul style="list-style-type: none"> Reporting Equivalent access Rideshare Dedicated school buses 	<p>Option 3: Regulatory - amend the Transport Standards to require reporting and equivalent access, clarify the coverage of rideshare and dedicated school buses.</p>
<p>Part 2: Information, communication and wayfinding</p> <ul style="list-style-type: none"> Better communication of accessibility features Timely provision of information Real time communication Passenger location during journey Hearing augmentation on conveyances Hearing augmentation: Infrastructure and premises Print size and format International Symbol for Access and Deafness Letter heights and luminance contrast of signs Location of signs Braille embossed (printed) specifications Braille and tactile lettering for signage Lifts: Braille and tactile information at lift landings Lifts: Audible wayfinding Lifts: Emergency communication systems in lift cars Lifts: Reference for lift car communication and information systems Information and communication technologies (ICT) procurement Mobile web systems Accessible fare system elements 	<p>Option 3: Regulatory - amend the Transport Standards to include new or updated requirements for information, communication and wayfinding, such as timely provision, real time communication, passenger location, hearing augmentation, print size and format, international symbols, letter heights and luminance contrast, location of signs, braille specifications and lettering, lifts, ICT procurement, mobile web systems and accessible fare system elements.</p> <p>Please note there are no lifts in the NT public transportation network.</p>
<p>Part 3: Accessibility at stations, stops, wharves and access routes</p> <ul style="list-style-type: none"> Doors on access paths Continuous accessibility on access paths Flange Gaps Resting points Requirement for handrails in overbridges and subways Location of Fare System Elements Allocated spaces and priority seating in waiting areas Accessible toilets with equal proportion of left and right hand configurations Emergency call buttons in accessible toilets 	<p>Option 3: Regulatory - amend the Transport Standards to include new or updated requirements for accessibility at stations, stops, wharves and access routes, such as doors on access paths, continuous accessibility, flange gaps, resting points, handrails in overbridges and subways, location of fare system elements, allocated spaces and priority seating in waiting areas, accessible toilets with equal proportion of left and right hand configurations, emergency call buttons in accessible toilets, ambulant toilets, lift specifications and enhancements, specifications for escalators and inclined travelators, poles objects and luminance contrast and lighting.</p>

<p>Part 4: Accessibility on conveyances</p> <ul style="list-style-type: none"> Allocated spaces and priority seating Boarding devices Handrails and grabrails Doorways and doors Ramps and stairs Floor surfaces Lighting and luminance contrast Emergency call buttons and alarms Emergency exits and evacuation procedures Audible announcements and visual displays Hearing augmentation systems Accessible toilets with equal proportion of left and right hand configurations Ambulant toilets Luggage storage areas Fare system elements 	<p>Option 3: Regulatory - amend the Transport Standards to include new or updated requirements for accessibility on conveyances, such as allocated spaces and priority seating, boarding devices, handrails and grabrails, doorways and doors, ramps and stairs, floor surfaces, lighting and luminance contrast, emergency call buttons and alarms, emergency exits and evacuation procedures, audible announcements and visual displays, hearing augmentation systems, accessible toilets with equal proportion of left and right hand configurations, ambulant toilets, luggage storage areas and fare system elements.</p>
<p>Part 5: Compliance framework</p> <ul style="list-style-type: none"> Reporting requirements Performance indicators and targets Compliance audits and inspections Sanctions and penalties for non-compliance or breaches of the Transport Standards Independent oversight body Appeals process 	<p>Option 3: Regulatory - amend the Transport Standards to include new or updated compliance framework and enforcement mechanisms, such as mandatory reporting requirements, performance indicators and targets, compliance audits and inspections, sanctions and penalties for non-compliance, independent oversight body and appeals process.</p>
<p>Part 6: Other issues</p> <ul style="list-style-type: none"> Wheelchair accessible taxis (WATs) Mobility scooters and other mobility aids Assistance animals and carers 	<p>Option 3: Regulatory - amend the Transport Standards to include new or updated provisions or definitions related to other issues, such as wheelchair accessible taxis (WATs), mobility scooters and other mobility aids, assistance animals and carers.</p>

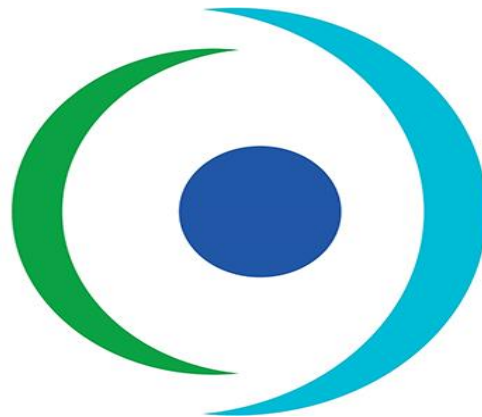
Conclusion

We conclude our submission by strongly recommending that the government adopts the most stringent and comprehensive regulatory option for the review of the Transport Standards.

We believe that this option will ensure that public transportation in the NT is accessible and inclusive for people with disabilities, as well as for other members of the community.

We think that this option will begin to address the current issues and challenges that people with disabilities face when using public transportation in the NT, such as the lack of or limited public transportation options, especially in remote and Aboriginal communities; the inaccessibility and unsafety of public transportation infrastructure, vehicles, and practices; and the inadequate and unavailable communication and information provision for public transportation users with disabilities.

We also suggest that the government engages with people with disabilities, their representatives, and service providers to co-design and co-deliver solutions that are responsive to their needs and preferences. We appreciate the government's initiative to review the Transport Standards and we hope that our submission will assist the review and help achieve the Transport Standards' objectives.



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