



# **Kin Disability Advocacy Submission on Fourth Review of the Disability Standards for Accessible Public Transport 2002 (Transport Standards).**

June 2023

## Table of Contents

Introduction:.....	3
Focus Feedback Results .....	4
Views of the disability community on their involvement in transport.....	4
Challenges or barriers that stop people with a disability from using public transport. ....	5
What were the main difficulties encountered using Public Transport Information as a CaLD person with a disability? .....	6
Improving the accessibility and availability of public transport information? .....	7
The impact experience of people with disabilities engaging public transport staff when using public transport services. ....	8
What could be done to improve the level of understanding by public transport staff regarding the needs of people with disabilities? .....	9
Have you ever experienced rail platform access issues as a person with a disability? .....	9
What specific rail platform access issues have prevented you from undertaking successful journeys by rail as a person with a disability? .....	10
What could be done to improve rail platform access for people with disabilities? .....	10
Have you ever experienced bus access issues as a person with a disability?.....	11



## Kin Disability Advocacy Submission on Transport Standards

What specific bus access issues have prevented you from undertaking successful journeys by bus?.....	11
What could be done to improve bus access for people with disabilities? .....	12
What specific changes or improvements would you like to see in bus access for people with disabilities in your local area? .....	12
Have bus access issues ever prevented you from undertaking a journey by bus? .....	13
Have you ever experienced issues when using taxis <b>/Uber/Rideshare</b> as a person with a disability? .....	14
What specific issues have prevented you from undertaking successful journeys on taxis /Uber/Rideshare as a person with a disability? .....	14
What could be done to improve accessibility on taxis <b>/Uber/Rideshare</b> for people with disabilities?.....	15
Have you ever experienced travelling with companion animal on public transport as a person with a disability? .....	16
<b>Recommendations</b> .....	<b>19</b>
<b>Conclusion</b> .....	<b>21</b>



## Kin Disability Advocacy Submission on Transport Standards

### Introduction:

#### **About Kin Disability Advocacy (formerly EDAC):**

Kin Disability Advocacy formerly (EDAC) is Western Australia's peak not-for-profit organisation advocating for the rights of people with a disability, from a Culturally and Linguistically Diverse (CALD) background and their family and carers.

Kin Disability Advocacy is a member of the National Ethnic Disability Alliance (NEDA).

Kin Disability Advocacy currently receives recurrent funding from the Australian Department of Social Services (DSS) and the WA Department of Communities Disability Services (DS).

Kin Disability Advocacy delivers individual and systemic advocacy services in the metropolitan, regional, and remote areas of WA. This includes state-wide CALD advocacy services and individual generalist advocacy to WA's North-West region (Kimberley and Pilbara).

Additional project funding is used to deliver human rights-based self-advocacy training for people with disability and their families/carers.

Kin Disability Advocacy runs DSS funded Digital Communication Project where issues of disability and ethnicity are discussed in terms of new and existing services, policies, legislation, etc.

Kin Disability Advocacy also generates extra income from its cultural competency training for the disability services sector. This training is delivered in line with the National Disability Services Standards.

Systemic advocacy is an important part of Kin Advocacy's work. Kin Advocacy is committed to ensuring the voice of Culturally and Linguistic Diverse people with disability are heard and represented. Kin Disability Advocacy appreciate the opportunity to participate in the fourth review of the disability standards for accessible public transport 2002 (Transport Standards).

Kin Disability Advocacy recognises the purpose of constantly reviewing the Transport Standards, and the important need to evaluate how access to public transport standards are working to support people with disability participate and connect to access vital services.

The review of the Transport Standards provides the opportunity for people with disabilities to be accorded equitable access without discrimination. The Disability Discrimination Act 1992 (DDA) seeks to eliminate discrimination, as far as possible, against people with disability. Public Transport is a service covered by the DDA.

The DDA is supplemented by a series of disability standards that detail the rights and



## Kin Disability Advocacy Submission on Transport Standards

responsibilities regarding equal access and opportunity for people with a disability to live their lives as equal citizens engaging in education, employment, social, economic, political, spiritual and cultural pursuits alongside their peers.

### Focus Feedback Results

In preparing this submission, Kin Disability Advocacy conducted a focus session with our Community Ambassadors and clients to gain their feedback on accessibility of transport and their views and ideas for the review.

The number of people who participated in the focus discussion was 9, and an additional 6 clients were interviewed via phone by our individual advocates.

The total participants were 15 respondents from diverse disability, gender, and age.

Their responses are significant indicators to explain their experiences which provide useful insights on how the transport accessibility can be improved.

### Views of the disability community on their involvement in transport.

*Table 1: Benefits of involving people with a disability in the public transport sector.*

<b>Response</b>	<b>Respondents</b>	<b>Percentage</b>
Consideration of accessibility	3	61.1%
Providing a better understanding of the needs of people with disabilities	2	13.3%
Increasing awareness of disability needs and issues	1	6.7%
All are important	9	60%
Any other benefits	2	13.3%
<b>Total</b>	<b>15</b>	<b>100.0%</b>

### Comments

Majority considered that all are important considerations to improve the quality of service.

The participants who noted any other benefits involving in the transport stated.

- Working together with all stakeholders with people with disability significantly benefits all working in the industry.
- Engaging people with disability through codesign improves the staff capability and their cultural competency creating better understanding.
- People with disability are not isolated and their contribution in social, economic, and civil interactions cannot be ignored.



## Kin Disability Advocacy Submission on Transport Standards

A lack of participation opportunities can hinder this success when disability impacts people's ability to participate in socio-economic activities because of the reduced participation chances of isolation. Equitable participation and levelling the playing field are made possible by increased mobility and accessibility.

### Challenges or barriers that stop people with a disability from using public transport.

*Table 2: Challenges and Barriers*

<b>Response</b>	<b>Respondents</b>	<b>Percentage</b>
Lack of information	7	46.7%
Lack of opportunity to participate	1	6.7%
Lack of resources	2	13.3%
All of the above	4	26.7%
Other (please specify)	1	6.7%
<b>Total</b>	<b>15</b>	<b>100.0%</b>

### Comments

Majority respondents considered that providing more information about using public transport system was a challenge and a barrier.

information, suite communications and other facilities and services provided to the public, need to consider the Ethnocultural and linguistic diverse needs of people with disability.

The respondents wanted information on:

- The route Timetables and schedules.
- The information about accessible features on public transport facilities e.g., ramps, lifts, audio tech, signage, accessible seating, etc.
- Information about alternative routes or modes of transport.
- Changes or shutdown of train and buses to enable plan journey effectively.
- Clear instructions on boarding a train, if they cannot understand the signage or print media.
- International Airlines provide limited and confusing information for travelers with disability.
- Pre-journey travel information

It is important to meet the travel requirements of specific populations.

People with disability, depending on the type of their diverse disability, will require specific classes of information, and in accessible formats to plan their journey.



## Kin Disability Advocacy Submission on Transport Standards

It is not unusual that people with disabilities frequently request more extensive travel information because diversity of people with disabilities have diverse information needs, and this depends on their frequencies of public transport use.

They may be curious about inaccessible practical information, anxious about where to stand or sit, and information on building and vehicle accessibility. The focus is on information that will not hinder the journey but will enhance the traveller's knowledge of what to expect.

Different diversity of disability has varying degrees of need for travel information, depending on the capacity of each diverse disability population group's aptitude for navigating the public transportation system.

The information required for each subgroup is likewise more tailored to the impairment and the travel-related difficulty it causes.

### What were the main difficulties encountered using Public Transport Information as a CaLD person with a disability?

The responses by both Community Ambassadors and Kin Advocacy clients to the question is stated in the table below:

*Table 3: Difficulties Encountered using Public Transport Information*

<b>Response</b>	<b>Respondents</b>	<b>Percentage</b>
<b>Lack of clear and concise information</b>	9	60%
Information not provided in accessible formats (e.g., Braille, audio, large print or getting someone explain signage in my language)	3	20%
Confused, could not find someone to explain	1	6.7%
Most information's are on websites	2	13.3%
<b>Total</b>	15	100.0%

### Comments

Participants indicated range of issues that they had encountered difficulties using public transport information as a person with a disability from CaLD background.

- The Ethnocultural and linguistic diverse people with disability noted difficulty accessing information in websites especially when such websites do not provide translated languages.
- Using computers or to be updated with information relating to travel or search culture may be necessary, but this is not practicable or applicable for CaLD people with disability due to their migration experiences.



## Kin Disability Advocacy Submission on Transport Standards

- CaLD person with disability may not understand the action of a bus kneeling and putting the ramp out, and the symbolic significations to board the bus especially when this is their first experience.

A person's well-being and quality of life depend on their capacity to move around freely and independently to participate in society. Impediments within urban environments and public transportation networks often hinder individuals with disabilities from utilising public transportation.

People with disabilities may experience various adverse effects if they cannot take part in society because they have limited understanding features in the transport sector, subsequently being prevented from travelling in public transport.

### Improving the accessibility and availability of public transport information?

Participants responded to this question in the following way:

*Table4: Improvement of Public Transport Information*

Response	Respondents	Percentage
Provide information in multiple accessible formats	5	31.25%
Increase the number of routes and services based on LGAs and data on diverse disabilities	1	6.7%
Improve signage and wayfinding	3	20%
Improve timetables using bigger fonts and clear colouring	1	25.00%
Improve accessibility features and safety	2	13.3%
Provide multicultural translated information on your websites	3	20%
<b>Total</b>	<b>15</b>	<b>100.00%</b>

### Comments

The above respondent's view demonstrates that barriers people with disability experience arise due to gender, age, Aboriginality and migrant/refugee identities and status may include but not limited to:

- Easy to access and easy to understand timetabling information or changes to schedule is considered an accessibility need equally important for some diversity cohorts of people with disability as an accessible build environment is for others.
- Strong reliance on modernised online or digitised fare systems such as the use of Qr code, 'tap and go' enable some people with disability to have more efficient journeys; but the same systems can also significantly be problematic to others who are unable



## Kin Disability Advocacy Submission on Transport Standards

to access the internet or find website portals inaccessible, or those among who require transport personnel to discuss travel assistance and fare arrangements.

- The public transport safety which needs to be incorporated in the public transport reform agendas to provide additional requirements for Women with disability and other vulnerable cohort groups.

Countries with huge migrants and refugee population such as USA and UK, Accessible design transport standards is being practiced across cities, although this does not mean they have more CaLD people with disability.

First, the success transport outcome resulted because the efficient and secure movement of diverse people with disabilities was taken into consideration.

Secondly, because of The process of implementation of accessible design, public transportation use expanded. Therefore, the more access to crucial urban resources improves, and when priority is given to all stakeholders in the transport users, the perceived quality of life increased.

From the above discussion, the public transport operators and/or governments should be responsible for ensuring that public transport information is accessible and easy to understand for people with disabilities.

Travel information is necessary for specific diverse groups, including older adults and those with disabilities, whose intended uses may vary. Impulsive travel by older and passengers with disabilities via local public transportation requires substantial enhancements.

Therefore, acknowledging intersectionality and the diversity of disability is fundamental to understanding and responding to the multiple and compounding barriers people with disability experience when accessing or using public transport.

It is important to consider the passenger's needs of older and ethnocultural linguistic diversity of people with disabilities while travelling. To provide proper travelling information, one must have a solid grasp of how to present that information to the travelers.

**The impact experience of people with disabilities engaging public transport staff when using public transport services.**

Most of the respondents in both focus group and client's interview had experienced elements of a lack of understanding by public transport staff when using public transport as a person with a disability.





## Kin Disability Advocacy Submission on Transport Standards

- Experienced interpersonal discrimination such as Intimidation, bullying, lack of understanding type of assistance required and unfair competitions for accessible seating.
- Lack of knowledge about disabilities, ignorance of the needs of people with disabilities, and the gender and age of the person.
- Inadequate assistance in boarding or alighting the vehicle.
- Failed to provide information about accessible features on the vehicle – ramps, lifts, accessible seating to communicate to the passengers.

Some staff may sometime influence engaging in negative or discriminatory behaviour.

However, it is possible that people with disabilities will encounter instances of interpersonal prejudice by both travelling members of the public and workers in the transportation industry. These need to be restrained because Interpersonal conflict may impact individual’s autonomy to travel as they sought to avoid contact with such negative reactions and discriminatory attitudes.

### What could be done to improve the level of understanding by public transport staff regarding the needs of people with disabilities?

The suggestions given were as indicated below:

*Table 5: Improvement of understanding of public transport staff*

<b>Response</b>	<b>Respondents</b>	<b>Percentage</b>
Provide disability awareness training for staff and accessibility should be part of every new training initiative	6	40%
Develop better communication systems between staff and people with disabilities	3	20%
Employment of volunteers living with disabilities on public transport & environments so everyone can interact and learn from each other to gain greater knowledge to be better equipped to deal with the situation	4	26.7%
<b>Regular audit of accessibility issues</b>	2	13.3%
<b>Total</b>	15	100.0%

### Have you ever experienced rail platform access issues as a person with a disability?

The responses were as follows:

*Table6: Experienced rail platform issues*

<b>Response</b>	<b>Respondents</b>	<b>Percentage</b>
Yes	11	73.3%



## Kin Disability Advocacy Submission on Transport Standards

No	4	26.7%
<b>Total</b>	15	100.0%

### Comments

Majority of the respondents had experienced rail platform access issues as a person with a disability.

What specific rail platform access issues have prevented you from undertaking successful journeys by rail as a person with a disability?

The responses given included:

*Table7: Specific issues prevented successful completion of rail journey.*

Response	Respondents	Percentage
Inadequate ramps or lifts to access the platform	6	44.4%
Insufficient space to maneuver a mobility device on the platform	1	11.1%
Inadequate or poorly marked accessible seating on the platform	1	16.7%
Other (please specify)	7	27.8%
<b>Total</b>	15	100.0%

### Comments

**The respondents who answered "other" specified the following."**

- Gaps between trains and the platform, steep gradients
- Mobility Chair wheels got stuck in gap between the carriage floor and platform.
- No alternative options system when lifts are out on some stations.
- People standing in the doorways and sitting in reserved seating.
- When major reconstruction is on the way, the alternative bus route services to replace the train services disadvantage diversity of disability as the announcements come too late.
- Such announcements are mostly posted on Transperth website which may not be accessible for CaLD people with disability.

What could be done to improve rail platform access for people with disabilities?

*Table8: Improve rail access.*

Response	Respondents	Percentage
Provide better accessibility features, such as ramps or lifts in all key stations	5	33.3%



## Kin Disability Advocacy Submission on Transport Standards

Increase the number of priority accessible seating spaces on the platform	2	13.3%
Develop better signage and wayfinding	5	33.3%
Other (please specify)	3	20%
<b>Total</b>	<b>15</b>	<b>100.0%</b>

### Comments

#### The respondents who answered "other" specified the following."

- Have enough time for people about to assist with getting on and off the train or at least holding the train to allow people on and off with mobility aids.
- Narrow the platform gaps to a uniform standard regardless of which station you are at
- Sometimes only one lift servicing huge population is not enough. You are competing with people with prams and bikes etc.
- Address gap between train and platform
- Stop building stations with a steep incline.
- Provide more lifts that are well maintained.
- Provide more elevators.
- Provide ramps.
- Provide ramps from the start not stairs leading to a ramp as is in the case of some stations.

### Have you ever experienced bus access issues as a person with a disability?

The responses were as follows:

*Table9: experienced buses access issues*

Response	Respondents	Percentage
Yes	9	60%
No	6	40%
<b>Total</b>	<b>15</b>	<b>100.0%</b>

### Comments

Majority indicated that they had experienced bus access issues as a person with a disability.

### What specific bus access issues have prevented you from undertaking successful journeys by bus?

The responses were as follows:

*Table10: access issues prevented undertaking journey by bus*

Response	Respondents	Percentage
<b>Inadequate heating facilities</b>	<b>1</b>	<b>25.0%</b>



## Kin Disability Advocacy Submission on Transport Standards

Insufficient space to manoeuvre a mobility device on the bus	2	37.5%
Inadequate or poorly marked accessible seating on the bus	2	12.5%
Inadequate ramps or lifts to access the bus	4	
Other (please specify)	6	25.0%
<b>Total</b>	<b>15</b>	<b>100.0%</b>

### Comments

#### The respondents who answered "other" specified the following."

- People refusing to move knowing that a person with mobility aid needs the seat.
- not all drivers lower the bus as well as activate the ramp.
- Insufficient time between bus & train transition
- Difficult to follow timetables and there are no seats or shelters.

#### What could be done to improve bus access for people with disabilities?

The responses provided were as follows:

*Table11: improvement to bus access*

Response	Respondents	Percentage
Provide better accessibility features, such as ramps or lifts	5	33.3%
Increase the number of accessible seating spaces on the bus	3	20%
Develop better signage and wayfinding	3	20%
Other (please specify)	4	26.7%
<b>Total</b>	<b>15</b>	<b>100.0%</b>

### Comments

#### The respondents who answered "other" specified the following."

- Develop better public awareness.
- Make compulsory the standard requirement that all buses 'kneel' prior to opening the front door to cater for the needs of everyone.

#### What specific changes or improvements would you like to see in bus access for people with disabilities in your local area?

The respondents recommended the following:

- All buses should accommodate wheelchairs, have wheelchair restrictive facilities and be able to lower passengers on wheelchairs to board.



## Kin Disability Advocacy Submission on Transport Standards

- The ramps should be improved to serve their purpose effectively.
- Buses should also allow persons with disability to leave by the back door where permissible so that they do not have to try to turn a scooter or wheelchair around on a moving bus.
- It should be a standard requirement that all buses 'kneel' prior to opening the front door.
- Bus signage needs to improve including use of audio instructions and all buses to have ramps, and the bus drivers to put these ramps out.
- Provide appropriate signage, audio announcements, marked seating, protective shelter.

### Have bus access issues ever prevented you from undertaking a journey by bus?

*Table12: bus access issues prevented access.*

Response	Respondents	Percentage
Yes	10	66.7%
No	5	33.3%
<b>Total</b>	15	100.0%

#### Comments

Majority respondents to the question reported that bus access issues had prevented them from undertaking a journey by bus.

#### **Those who answered "Yes", noted the following impact on their travel plans and/or experiences:**

- There are few busses in particular route area which may be far to walk and inaccessible.
- Disappointed when I am limited to organize meetings with friends and family due to unfavourable route plans and bus timetables.
- There were instances I felt buses are not reliable, time consuming and I have to get to the train by taxi or using other means of transport.
- I couldn't get in the bus because did not have appropriate wheelchair restrain.
- Timetable schedules are distance apart during the weekends, getting to your travel destination will be delayed by the bus and this was so frustrating.
- Being a recent arrival, still learning how to use the bus routes, not familiar and need someone to help me. I am not confident to travel alone.
- Sometimes the journey is too long for circle route services and many stoppages which is so tiresome and exhausting.
- Scared of rowdy passengers who don't understand my disability.



## Kin Disability Advocacy Submission on Transport Standards

- Drivers that were in a hurry and not understanding that people may require more time entering and exiting the bus.

Have you ever experienced issues when using taxis **/Uber/Rideshare** as a person with a disability?

The responses were as follows:

*Table 13 experienced issues with taxis*

Response	Respondents	Percentage
Yes	12	80%
No	3	20%
<b>Total</b>	15	100.0%

### Comments

Majority 80% of those who responded to the question had experienced issues when using taxis **/Uber/Rideshare** as a person with a disability.

What specific issues have prevented you from undertaking successful journeys on taxis **/Uber/Rideshare** as a person with a disability?

The responses included:

*Table14: issues that prevent using taxis.*

Response	Respondents	Percentage
Inadequate accessibility features on the vehicle	1	6.7%
Could not cater to maneuver mobility device because the space in the vehicle was too small	2	13.3%
Inadequate or poorly marked accessible seating	1	6.7%
Negative reactions from taxi drivers <b>/Uber/Rideshare</b> towards your disability	5	33.3%
Other (please specify)	6	40%
<b>Total</b>	15	100.0%

### Comments:

The respondents who answered "other" specified the following."

- Driver was curious about my work/dress code and didn't focus on the role, constantly on call with colleagues.
- Lack of understanding of TUSS system and subsidies.
- Took long to arrive on time.
- The new taxi APP does not cater for people with TUSS vouchers; in fact, give opportunity for exploitation of people with disability.



## Kin Disability Advocacy Submission on Transport Standards

- Some Taxi drivers take advantage of people with disability (the blind) and those unaccompanied, and do whatever is in their interest, not of their passengers.
- Taxi drivers not picking up a person who has a guide dog and drivers refusing to pick passengers after noting the short distance or realizing a person with a disability that has a taxi subsidy booklet.

What could be done to improve accessibility on taxis **/Uber/Rideshare** for people with disabilities?

The responses included:

*Table15: improvement of accessibility to taxis **/Uber/Rideshare***

Response	Respondents	Percentage
Provide better accessibility and security features, such as ramps or lifts	3	20%
Increase the number of accessible taxi <b>/Uber/Rideshare</b> vehicles	5	33.3%
Develop better and fair policies and guidelines for taxi <b>/Uber/Rideshare</b> operators	5	33.3%
Other (please specify)	2	13.3%
<b>Total</b>	15	100.0%

Comments:

**The respondents who answered "other" specified the following."**

- Gender specific cabby
- Taxi **/Uber/Rideshare** drivers to pick up a person with a disability.
- Attitude training, better security features for taxis **/Uber/Rideshare**
- Someone needs to fix the APP used by taxi companies.
- Cost is high especially for taxis for those using TUSS.
- Taxi/Uber/Rideshare drivers should not refuse a person who is blind that has a guide dog once the policies are synchronized to cater for all stakeholders.
- A Penalties if Taxis refuse to pick a person that has a taxi subsidy scheme booklet.
- Better communication to passenger if the taxi is late, sometimes passenger waits unnecessarily which frustrates the journey.
- Stop relying on Apps because some find phone calls easier,
- Take most direct route,
- Refrain from discussing inappropriate subjects such as sex or sexualizing,
- Understand a lot of customers may suffer anxiety.



## Kin Disability Advocacy Submission on Transport Standards

Have you ever experienced travelling with companion animal on public transport as a person with a disability?

The responses were as follows:

*Table16: companion animal issues with taxis*

Response	Respondents	Percentage
Yes	2	13.3%
No	9	60%
Others	4	26.7
<b>Total</b>	15	100.0%

### Comments

60% of those who responded No to the question had not experienced travelling with companion animal on public transport as a person with a disability.

However, those who responded Yes to the question said that they experienced:

- Lack of understanding or awareness from transport staff.
- Inadequate accessibility features for companion animals on public transport facility.
- Noted negative reactions from other passengers towards their companion animal.

A third of the respondents who answered "other" specified the following concerns related to travelling with companion animal on public transport as a person with a disability:

- They thought companion animals are not allowed on public transport as they are not recognized as service animals.
- The Owner/handler needs public access test paperwork qualifications which require more time and resources.
- There is no consistency policy across jurisdictions on the use of companion animal on public transport.
- Many people are only used to guide dogs not other support animals in public transport system.

Understandably, assistance dogs and their owners may legally access any event, place of business, public area, mode of public transportation, and ride-sharing vehicle in Australia.

this right is protected by Australian law to guarantee equitable access and inclusion for people with disabilities who rely on assistance dogs for help.

These legislative protections are in place to ensure that people with disabilities are not subjected to prejudice or hurdles because of their reliance on an assistance dog and can take part fully in society, access services, and enjoy public areas.





## Kin Disability Advocacy Submission on Transport Standards

However, the owner of an assistance dog must adhere to any rules and specifications that may be relevant, such as making sure the dog is well-behaved, well trained, and under control always.

In each Australian state and territory, the following departments oversee providing services for people with disabilities or overseeing animal laws:

<b>Responsible Department</b>	<b>Legislation</b>
<b>ACT</b> - Community Services Directorate	Domestic Animals Act 2000 (Section 41)
<b>NSW</b> Department of Communities and Justice	Companion Animals Act 1998
<b>NT</b> - Department of Local Government, Housing, and Community Development	Dog Act
<b>QLD</b> - Department of Communities, Disability Services and Seniors	Guide, Hearing and Assistance Dogs Act 2009
<b>SA</b> - Department of Human Services	Dog and Cat Management Act 1995 (Section 72A)
<b>TAS</b> - Department of Communities Tasmania	Dog Control Act 2000
<b>VIC</b> - Department of Health	Domestic Animals Act 1994 (Section 9C)
<b>WA</b> - Department of Communities	Dog Act 1976 (Section 68)

Assistance dogs, also known as service dogs, and their owners are frequently permitted entry into all public areas in Australia, including shops, events, parks, public transportation, and ride-sharing cars.

The Disability Discrimination Act of 1992 (DDA), which prohibits discrimination against people with disabilities, including not allowing them to travel with their service dog is the principal federal statute that applies.

However, it is crucial to take note that to exercise these rights, an assistance dog typically needs to meet particular training requirements or qualify for accreditation under applicable state or territorial jurisdiction. An identification card system for handlers exists in some Australian jurisdictions, and this need to be applicable in all states and territories.

Kin Advocacy would provide the following key considerations:

- **Legal Compliance:** Service animals must be permitted in public areas, including public transportation, under laws like the Disability Discrimination Act 1992 in Australia. This legal duty should be reflected in policies.
- **Clear Communication:** Assistance dogs should be allowed on all public transportation, as should be explicitly stated in policies. All visitors and staff members should have easy access to this information, awareness, and training.



## Kin Disability Advocacy Submission on Transport Standards

- **Staff Training:** Transport personnel should receive training on how to behave politely with passengers who have assistance dogs and on their legal rights.
- **Facilities and Accommodations:** It is important to consider the practical requirements for assistance dogs which include providing the dog with enough room to move around, access to water, and suitable restroom facilities at transportation hubs.
- **Emergency Procedures:** Procedures for handling crises involving assistance dogs should be included in policies, handling circumstances where the dog becomes unwell or hurt, or evacuating both the dog and its handler during an emergency.
- **Feedback Mechanisms:** Regarding the treatment of assistance dogs on public transportation, there should be a clear framework in place for passengers to offer suggestions or lodge grievances. Policies and procedures should be regularly updated and improved using this feedback.
  - Transportation authorities could collaborate with groups that train and help dogs with policies and processes which are based on empirical knowledge.
  - **Public Awareness:** Public awareness campaigns can help to educate the public about the role of assistance dogs and the rights of their handlers. This can help to create a more inclusive and understanding environment on public transport.
  - **Policy Review:** Policies should be regularly reviewed and updated to ensure they continue to meet the needs of passengers with assistance dogs and comply with any changes in legislation.

Inclusion of assistance dogs in transport policy and strategy not only ensures compliance with disability discrimination laws but also promotes an inclusive society that respects and values the independence and dignity of individuals with disabilities.

From the focus group discussion and our client's interviews, we noted that there should be policies in place to prevent prejudice since some taxi and ride-sharing drivers refuse to transport assistance animals for moral or cultural grounds.

Options to investigate should be in place if a driver cannot transport an assistance dog for religious or cultural reasons. For instance, permit the driver to switch trips with a different driver who is not subject to these limitations.

Whatever the option, the traveler with the service dog must identify the service dog companion in their itinerary and should not experience any delays or inconveniences, making sure that everyone's rights are upheld without unnecessary hardship.



## Kin Disability Advocacy Submission on Transport Standards

To make sure that these rules are reasonable, respectful, and comply with the law, they should be prepared with legal professionals, disability advocacy organizations, and representatives from relevant religious or cultural communities.

Designing a system that accommodates both the rights of passengers with assistance dogs and the religious or cultural beliefs of drivers can be challenging, but it is not impossible.

The following practical system could be implemented:

- **Driver Identification:** During the onboarding process, drivers who cannot transport assistance dogs because of religious or cultural reasons can be identified. This information can be stored in the company's database. However, it is important to ensure this does not lead to discrimination against these drivers.
- **Ride Allocation System: The ride allocation system can redirect ride requests from passengers with assistance dogs away from drivers who have identified as unable to transport these passengers automatically.** This should happen seamlessly and quickly to avoid any delay for the passenger.
- **Backup Drivers:** In areas with fewer drivers, the company could ensure there are always backup drivers available who can transport assistance dogs. This could be achieved through incentives or scheduling strategies.
- **Driver Swapping:** In case a passenger with an assistance dog is matched with a driver who cannot transport them, the system should allow for quick and easy ride swapping. The original driver could send a request to nearby drivers to take the ride. This should happen within the app and without any involvement from the passenger to avoid inconvenience.
- **Passenger Notification:** If there is any delay in finding a suitable driver, the passenger should be notified and given an accurate estimate of their new wait time. They should also have the option to cancel the ride without penalty if the wait time is too long.
- **Monitoring and Feedback:** The company should closely monitor the effectiveness of this system and gather feedback from both drivers and passengers. This can help identify any issues or areas for improvement.
- **Penalties for Misuse:** There should be penalties for drivers who misuse this system to avoid transporting passengers with assistance dogs without a valid reason.
- **Training and Awareness:** All drivers should receive training on this system and the importance of non-discrimination. The company could also run awareness campaigns to educate passengers about their rights.

### Recommendations

- Provide more funding for disability organisations to provide training, advocacy, and awareness support.



## Kin Disability Advocacy Submission on Transport Standards

- Provide more opportunities for people with disability to participate in co-design activity promoting the involvement of the disability community in transport planning and procurement processes.
- The taxi Users Subsidy booklet needs to be a digital card consistent with Eastern States and Territories, and the half price to be increased for users to afford to access more taxis.
- There should be a clear definition of what constitutes "equivalent access" for people with disabilities in transport regulations.
- Individual States and Territories jurisdictions to conduct accessibility audits of transport systems and services.
- Prioritise quality of accessibility over aesthetics to include everyone accessing public transport.
- Improve accessibility and accommodations for people with disabilities on public transport by accommodating diversity of disability passengers and provide a uniform approach for wheelchair users.
- Wheelchair tie-down and occupant restraint systems should be used independently and safely, and they should be able to tolerate low levels of functional mobility and dexterity while still offering a high level of safety.
- Discourage using fluorescent lights which trigger photosensitivity, seizures, and migraines for some people with disability.
- Enable people with disability to view signs announcements from their wheelchair or seats even if the transport facility is crowded with standing passengers or when it is dark or very bright.
- Visually and cognitively impaired people should be able to access and rely on auditory messages to understand the actions and instructions in the Public Transport System.
- Provide Help on platforms or stop overs in public transport system for Connected and automated vehicles as some people with disability may need Passenger Transit Assistance or customer service.
- Innovatively use appropriate app that can link autonomous vehicle (Connected and automated) that would simply alert passengers to the right stop and arrival locations.
- Standardise Colour schemes towards a nationally consistent colour scheme for all public transport in all jurisdictions to Agree on symbolics of colour controls and signs, for instance red equals emergency, blue equals stop, green equals opening the doors – this should also include colours of the grab rails, colours of wayfinding signs and audio signature labelling sound tunes at bus stops and train stations.
- Consider the needs of people with disability and consider matters of height, weight, shape, and material in the seating and braille writing design – braille users must be able to read with comfort; curved designs provide more support than flat designs; Pull down chairs need to be easy to pull down; Seatbelt design needs to be flexible to accommodate a variety of people, including children.
- Provide a richer set of information data and journey planning tools in various



## Kin Disability Advocacy Submission on Transport Standards

- formats that public transport users can access.
- ACROD bays need to be nearer entrances of train stations, and buses should 'kneel' before opening the door as a standard.
  - Provide bus shelters and seating, not just bus 'stands', to protect public transport users from rain and heat.
  - Emergency communication plans and consistent training procedures should exist in case of emergency – people with disability should not be the last to know what happens.
  - There should be within the disability standards for accessible public transport provision for companion animals in the following.
    - An explanation of companion/assistance animals.
    - Certification and identification processes to be nationally consistent.
    - There should be a nationally consistent protocol for on-demand services, rideshare, and Taxis in booking and ride allocation to those who culturally can take companion animals as passengers.
    - Acknowledgement that some frontline staff may have cultural or religious beliefs prohibiting them from taking a companion/assistance animal in their vehicle.
    - Frontline staff receive certification III-level training standardised nationally for those who provide transportation services for passengers with companion animals.

### Conclusion

From the above discourse in the fourth review of transport access standards, the respondents in both the focus group and our client's interview survey indicate that there is positive development since the last review.

There should be a greater consideration the amount of time one needs to plan the journey.

People with disabilities need to be sure that their journeys are safe and there is no intimidation or bullies.

The buck stops with the stakeholders Who is responsible to make safety a priority for people with disability.

The standards should prioritize policies that will prevent prejudice in the transport system.

Additionally, options should be pursued to investigate the reasons why a driver cannot transport an assistance dog, making sure that everyone's rights are upheld without unnecessary hardship.

It is important to make sure that the transport accessibility standard rules are reasonable and respectful of diverse cultures.



## **Kin Disability Advocacy Submission on Transport Standards**

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This should involve consultation with legal professionals, disability advocacy organizations, and representatives from relevant religious or cultural communities.