



## Blind Citizens Australia

Level 3  
Ross House  
247-251 Flinders Lane  
Melbourne Victoria 3000  
Telephone: 03 9654 1400  
Toll Free: 1800 033 660  
Fax: 03 9650 3200  
Email: [bca@bca.org.au](mailto:bca@bca.org.au)  
Website: [www.bca.org.au](http://www.bca.org.au)

### **Submission to the Inquiry into the Procurement of New Generation Rollingstock Trains**

23<sup>rd</sup> August 2018

ATTN: Mr Michael Forde, Commissioner  
Commission of Inquiry into New Generation Rollingstock Train  
Submitted via Email: [commissioner@traininquiryngr.qld.gov.au](mailto:commissioner@traininquiryngr.qld.gov.au)

Blind Citizens Australia (BCA) is the united voice of Australians who are blind or vision impaired.

Our mission is to achieve equity and equality by our empowerment, by promoting positive community attitudes, and by striving for high quality and accessible services which meet our needs.

BCA thanks the commissioner for the opportunity to provide feedback to the inquiry into the procurement of NGR trains. BCA will make comment on the placement of the guard's carriage at the rear of the train, and will make broader observations regarding procurement processes generally.

#### **1. Background Information**

Accessible public transport is essential in a society as it promotes inclusion and independence. For people who are blind or vision impaired, accessible transport can be a significant factor to enable participation alongside their peers in getting safely around their communities, including to and from work, carrying out everyday tasks and to social and family events. Without accessible and safe public transport, many people are at risk of isolation.

The right to the availability of accessible public transport is enshrined in human and disability rights.

The Disability Discrimination Act (1992) prohibits the direct or indirect discrimination towards people with disabilities. This includes access to public transport.

The National Disability Strategy 2010–2020 identifies accessible public transport as a key factor in the capacity of a person with disability to participate in, and contribute to society and the economy. Furthermore, the Disability Standards for Accessible Public Transport have been in place since 2002, and outlines the government's commitment towards disability access compliance.

From the 2012 review of these transport standards, a Whole of Journey Guide was developed, highlighting the need to work across government and other boundaries to improve the whole journey for people with disability. The Transport Standards enable public transport operators to demonstrate how discrimination has been removed from public transport services.

The Queensland Government has demonstrated a disregard of their disability rights obligations and these transport standards by rolling out the New Generation Rollingstock trains with known significant access issues.

## **2. Placement Of Guard At The Rear Of The Train**

BCA agrees with the position held by the Accessibility Reference Group, convened by Queensland Rail: the placement of the guard at the rear of the train places the safety of passengers with disabilities of all types at risk. This could result in people who require assistance to board the train being left behind if they are not seen via the train's camera system. One BCA member in Victoria lost an arm and a leg as a result of not being seen by the driver of the train when he mistakenly stepped in between two carriages, thinking that it was a doorway. There was no guard on the train in question. While BCA acknowledges that Queensland Rail's NGR trains will still carry a guard, placement of the guard at the rear of the train will mean that the guard will not be able to respond quickly in the event of an emergency on the platform, or be able to prevent accidents similar to the one involving our member.

Additionally, people who are blind or vision impaired have a wide variety of travel skills, ranging from having limited skills to being experienced travellers. BCA is concerned that people who require assistance due to having poor orientation and mobility skills may not be seen in time by the guard, and could miss their train as a result. Older trains have always had the guard in the middle of the train, enabling the guard to respond quickly

to the needs of passengers. Disability boarding points are located with the idea that they will line up with the middle of the train when a person boards. Orientation and mobility instructors typically teach people who are blind or vision impaired to locate these boarding points when the layouts of railway stations are being taught. It is understood that Queensland Rail will continue their policy of locating disability boarding points in the middle of the train, with the assumption that the camera system installed onboard will allow the driver and the guard to see anybody who requires assistance. The concerning point here is that when guards were located in the middle of the carriage, this assumption would not have to be made; guards would instantly see a person requiring assistance and be in close proximity to the person when the train stops at a station. The new system will require a guard to walk some 75 metres to reach the person at a disability boarding point. This is a design flaw that could easily have been avoided, had disability access been a priority at the time the NGR trains were designed. This point leads to the issue of procurement processes generally.

### **3. Procurement Processes Should Prioritise Disability Access Considerations**

The process of procuring the NGR trains has been dogged by political mud slinging and differing priorities of opposing governments. It is not evident that consideration was given to disability access requirements when the government's rail procurement process began, meaning that the NGR trains needed to be retro-fitted. Furthermore, there was no consultation regarding the design of accessibility measures, meaning that the trains were delivered with toilets which were not big enough to accommodate wheelchairs, and only one toilet with disability access for the whole train. An Accessibility Reference Group established by Queensland Rail has only recently made further recommendations for access improvements, despite the fact that these trains are now operational.

Victoria's high capacity trains are currently being designed, and disability access has been a major consideration in the design process. Extensive consultation has occurred between the company designing the trains and disability groups. BCA has been involved in these consultations from the beginning.

Broad consultation regarding disability access at the design stage of any government acquisition should be a standard aspect of procurement processes. It is appalling that the procurement of the NGR trains was allowed to become a political football, and consequently disregarded disability access until it was far too late. As a result, ensuring disability access was implemented in the end cost Queensland taxpayers many millions more than it ever should have.

The Queensland Government developed a state disability plan 2017 – 2020, with the commitment “to building a fairer, more inclusive Queensland where people with disability, their families and carers, are able to access opportunities on the same basis as everyone else” and “to create an inclusive society that enables people with disability to fulfil their potential as equal citizens”. Without accessible public transport options available to all Queenslanders, this commitment has a long way to go to being realised.

BCA calls for the depoliticisation of procurement processes relating to disability access requirements. This applies not only to the purchase of NGR trains, but all procurements by any government department. Disability access practices need to become embedded in all government activities and procurement processes, and should be given top priority from the beginning of any procurement and/or design process. Had this occurred in the case of the NGR trains, a much better result could have been achieved for people with disabilities far more quickly and without the need for costly retro-fitting.

#### **4. Conclusion**

Even after all that can be done to improve disability access on the NGR trains is completed, Queenslanders with disabilities will still experience less optimal access than they should. The placement of the guard at the rear of the NGR train is simply not a sensible option, for safety and efficiency reasons when assisting people with disabilities to board the train and in preventing accidents from occurring. Procurement processes should prioritise disability access from the very beginning, ensuring that genuine consultation with people with disabilities occurs at all stages of the design process. BCA welcomes any further questions regarding the points outlined in this document.

For further information, please contact:

Angela Jaeschke

Acting Policy and Advocacy Manager

Blind Citizens Australia



Phone: 03 9654 1400