

Vision Australia's Submission

Submission to Commission of Inquiry into the New Generation Rollingstock Train

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Submission to:

Michael Forde

Commissioner

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Introduction

Vision Australia would like to thank the Commissioner for the opportunity to provide a submission to the Commission of Inquiry into the New Generation Rollingstock Train (NGR). In particular, under the inquiry's terms of reference, this submission relates to the design approval process under the contract including engagement with the disability sector, and decisions made by respective Governments, statutory authorities and departments that caused or contributed to a lack of accessibility and functionality in the NGR.

About Vision Australia

Vision Australia is the nation's largest provider of services to people who are blind or have low vision. Our vision is that people who are blind or have low vision will have the choice to participate fully in every facet of life in the community.

To help realise this goal, we are committed to providing high-quality services to the community of people who are blind or have low vision, and their families, in areas that include early childhood, orientation and mobility, education, employment, information, recreation and independent living. We also work collaboratively with Government, business and the community to eliminate the barriers people who are blind or have low vision face in accessing the community or in exercising their rights as Australian citizens.

The knowledge and experience that Vision Australia gains through its interaction with clients and their families, and also by the involvement of people who are blind or have low vision at all levels of the Organisation, means that it is well placed to provide advice to governments, business and the community on the challenges faced by people who are blind or have low vision fully participating in community life.

Vision Australia, as an organisation in the blindness sector, therefore submits this comment to the Commission of Inquiry into the New Generation Rollingstock Train.

Queensland Government Accessibility Reference Groups

Vision Australia is represented on two Queensland Government transport reference groups; the Department of Transport and Main Roads Accessibility Reference Group (TMRARG), and the Queensland Rail Accessibility Reference Group, (ARG).

Unfortunately, a lack of full consultation at procurement and design stages of the NGR, has resulted in identification of a number of accessibility issues with the NGR trains. The focus of this submission will be on problems associated with the location

of the guard at the end of the NGR train, rather than mid-train close to the accessible boarding point on the platform.

Vision Australia made a submission to the Australian Human Rights Commission on 10 January 2018 in response to the Queensland Government application for temporary exemptions under the Disability Standards for Accessible Public Transport 2002 (Cwth) and the Disability Discrimination Act 1992 (Cwth).

Vision Australia was a member of the Accessibility Project Working Group (APWG), a sub-group of the Transport and Main Roads Accessibility Reference Group. The APWG was set up to make recommendations to the Minister for Transport. These recommendations were made with a view to resolving some of the accessibility issues on the NGR, and were submitted to the Minister early in August 2018. The scope of the matters considered by the APWG did not include access issues resulting from the location of the guard at the rear of the NGR.

Access to Transport

At Vision Australia we promote the rights of people who are blind or have low vision to have equal access to services, including public transport services. People who are blind or have low vision are not able to drive vehicles, and are therefore more reliant on other forms of transport, including public transport.

Due to some access barriers faced by people who are blind or have low vision, many opt to travel by train rather than by bus. Queensland Rail currently provides platform audio announcements, on board audio announcements indicating the name of each train station, and boarding assistance from the guard located mid-train.

Background

The NGR train was procured in December 2013 to the following technical specifications:

- (i) Single deck, electric train to operate on the South East Queensland suburban and interurban narrow-gauge rail network
- (ii) Six narrow body cars per train, with a train crew/drivers cab at each end (147 metres long)
 - (A) Two accessible cars (known as the MA and MB cars in the middle of the six-car set)
 - (B) Twelve allocated spaces, six in each accessible car
 - (C) One unisex accessible toilet module in the MB car

(D) Four priority seats in each car

The placement of QR staff at each end of the train, forming part of specification (ii), is of great concern to Vision Australia, and is the major focus of this submission.

Matters of discrimination falling outside the DSAPT

The NGR train design has the guard located in the final carriage of the train, rather than mid-train, next to the assisted boarding point on the platform as is the current train configuration. This requires a different boarding assistance procedure which presents a number of barriers for people who are blind or have low vision.

There are many reasons why some people who are blind or have low vision may seek boarding assistance. Some of these may include:

- a person who is new to vision loss
- a person who is new to using a long white cane for navigation
- a person who is new to using a Seeing Eye dog for navigation
- people with low vision who do not use a long white cane or a Seeing Eye dog
- people who are blind or have low vision travelling with children
- people who are blind or have low vision who have an additional physical disability
- people who are blind or have low vision who are frail aged

Guard Location

The isolation of the guard, 70 metres from the mid-platform assisted boarding point, is likely to diminish service levels for people who require assistance to board or alight, especially on unstaffed platforms. On these unstaffed platforms, customers who require boarding or alighting assistance could be overlooked or forgotten, left on the train or left behind on the platform. Unfortunately, this already occurs, and the frequency of these oversights is likely to escalate to a systemic problem with the increased remoteness of the guard. This is likely to constitute discrimination attributable to the design of the NGR.

The mid- train guard cab location is not a DSAPT issue, but Vision Australia believes that service failures are likely to occur and this will become a DDA issue. Currently, the guard cab is not more than 5 – 10 m from the assisted boarding point, allowing prompt and easy interaction between the guard and any customer waiting to board, including those who require assistance.

Platform Staff

Platform staff assistance has been offered as the solution to the dilemma of the guard's remoteness from the assisted boarding point. Currently there are many QR stations that are only staffed for a few hours a day, and only a small minority are staffed 24 hours per day. Staffing all stations throughout operational hours would be extremely expensive, and would be a target for future cost cutting. Only a design solution, namely a mid-train guard cab, would ensure that, on unstaffed platforms, boarding and alighting assistance will be available at close proximity to customers who require that assistance.

Hidden Disability

Customers with a hidden disability, waiting at the accessible boarding point will be located 70 metres from the guard in car 6. How will the customer communicate with the guard to ask for assistance? How will guards identify a hidden disability at that distance?

Guards will be challenged visually to identify a hidden disability at such a distance. On NGR trains, People who are blind or have low vision require verbal interaction with QR staff, as they are not able to identify non-verbal forms of communication such as waving or hand signals.

People who have low vision and do not use a cane or have an assistance animal, are people with a hidden disability.

The NGR boarding assistance trial

Vision Australia participated in the NGR Boarding Assistance trial that was hosted by Queensland Rail on 6 December 2017. During this trial a number of access issues were identified which are likely to adversely affect people who are blind or have low vision, and require boarding assistance. These include:

1. Identification of person with a disability requiring boarding assistance

2. Queensland Rail staff interaction with people who are blind or have low vision

3. Uncertainty around communication of destination station

Summary

Vision Australia seeks a finding by the Inquiry that there were failures in the design approval process for the NGR, including lack of engagement with the disability sector, and decisions made by respective Governments, statutory authorities and departments, and that these failures caused or contributed to a decision to locate the guard at the rear of the NGR train. Vision Australia also seeks a finding that the location of the guard at the rear of the train results in a lack of accessibility and functionality in the NGR for people requiring assistance with boarding and alighting.