

From: [REDACTED]
To: [Commissioner](#)
Cc: [REDACTED]; ceo@msqld.org.au
Subject: Submission to the New Generation Rollingstock Train Commission of Inquiry
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Submission to the New Generation Rollingstock Train Commission of Inquiry
Email : commissioner@traininquiryng.qld.gov.au

Wendy Lovelace

[REDACTED]
[REDACTED]
[REDACTED]

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To whom it may concern

I serve on the Queensland Rail Access Reference Group (QR ARG) (since 2014) and the Transport and Main Roads Access Reference Group (TMR ARG) (since January 2018).

On both Access Reference Groups I represent MS Queensland, with a member cohort exhibiting both obvious and hidden disabilities which might include any manifestations such as an impact on mobility, balance, fatigue, vision, cognitive response to navigation and space, changed sensory responses, continence issues to name just a few.

Although not located near a train station, I am a regular train user and require boarding and disembarking assistance every time I travel on the QR rolling stock due to irregular platform heights and gaps between platform and train car. This is currently enabled by the onboard staff ('guard') located mid-train in a position that aligns with the designated zone for assisted boarding. This location has been long established with QR station upgrades and new construction works. Travellers who need assistance are habituated to gravitate to this location for appropriate help.

The onboard boarding assistance model is a long established Queensland Rail response through a previous exemption application for non-compliance of provision of independent boarding (through the Disability Standards for Accessible Public Transport).

The inconsistency of platform height and gap between platform and train will continue to be a challenge to the provision of safe, functional, equitable and independent travel throughout the rail network in Queensland. Ours is an aging and developing transport infrastructure using

existing rolling stock, rails and buildings. The existing rail infrastructure is not a closed system with consistent rolling stock and platforms.

The existing New Generation Rollingstock appears to have been designed to suit such a closed system and have therefore been found to be less than suited for purpose.

Accordingly the procurement process for the acquisition of such non-compliant trains have been called to question.

Personal impact story

Fears of the sector have already been borne out in reality with passengers being left behind on board at the end of a journey or 'missing' their stop because assistance to de-board wasn't available in a timely manner .

NGR trains were initially operating on the only route that has stations that are fully staffed from first service to last service. This service model obviously continued for the duration of the Commonwealth Games.

If any exemption is to be considered it must be for the duration of the Commonwealth Games ONLY. After which all NGR trains to be removed from the track until proposed remodelling has been completed. The fact that non-compliant trains remain in operation, with more rolling out into service in spite of the Australian Human Rights Commission denial of the exemption is a thoroughly irresponsible and belligerent act by the Queensland Government.

This however does not address the ongoing issue of the need for reliance on staff assisted boarding and disembarking and the associated communication needs for such staff assistance.

People choose to live or remain living in locations well serviced by regular and reliable public transport. The potential unreliability of the use of the new NGR trains not aligning the on-board guard location with the assisted boarding point, long established by QR on station infrastructure and platforms through out the s-e Qld region puts reliability and confidence in the service at great risk.

Lives are built around this. Housing selected according to access to reliable and safe public transport options.

Confidence

Reliable

Consistent - causes confusion, uncertainty etc

#. Key requirements for continued confident use of the rail service by people requiring direct assistance are safety and predictability. Anything less is discriminatory.

People make life choices based on the availability of reliable public transport, and make significant financial, lifestyle and emotional decisions based on this :
Where to live, where to work, where to study, how to connect with family, friends, essential services (eg medical). All the elements that make up an ordinary life.

Naturally significant long term infrastructure, such as transport, must evolve. What no-one expects is that evolution to deliver a lesser outcome than the existing infrastructure it replaces.

This however is, and will continue to be, the outcome of the NGR project and the ongoing reliance on direct assistance to provide the outcomes required by the DDA through the DSAPT.

The guard at the rear is 70 meters distant from the designated assisted boarding point - the consequences:

source Wikipedia “The walking distance measure denotes the distance that can be travelled by walking in a fixed amount of time. In Japan, the standard measure for walking distance is 80 meters for 1 minute of walking time.” (source Wikipedia)

What can you see from 70m?

Joint respondents response : “ ... note that the location of the guard cab is not a mandated compliance requirement of the DSAPT or DDA. “

HOWEVER THE PROVISION OF A NON-DISCRIMINATORY SERVICE IS.

The fact that a rear located ‘guard’ does not provide certainly of boarding assistance makes the experience of passengers requiring assistance different to that of passengers who do not require assistance to board the train. The uncertainty creates great anxiety.....

1. Public release of Cabinet documents relevant to the decision to procure the New Generation Rollingstock (‘NGR’)

2. An inquiry, conducted by a neutral third party, into the NGR-related Cabinet and Departmental procurement decisions, with terms of reference including:
 - a. 'to determine precisely the errors of judgement, omissions, or other circumstances that led to the commissioning, design and manufacture of non-DSAPT compliant and substantively inaccessible NGR trains, including boarding and alighting arrangements for people with mobility, vision, and other relevant impairments.
 - b. 'to make systemic recommendations that will ensure fully-accessible, DSAPT-compliant Queensland rail travel'.

Joint QR TMR response dated 15 February 2018 includes the assertion that :

"While the rectification design work is underway, the NGR trains have entered passenger service in their current configuration to meet requirements for increased capacity for and beyond the 2018 Gold Coast Commonwealth Games.

The joint respondents applied to the Commission for a temporary exemption from sections of the DSAPT and DDA to provide legal certainty while the upgrade of non-compliant and non-functional elements are considered and carried out. This temporary exemption was denied. The NGR trains however have remained in service without alteration.

The initial roll-out of the NGR trains in December 2017 was on a track which had all stations staffed at all times service. This operating model is not indicative of the final service scenarios of full implementation, with some stations being unstaffed at all times and some stations that are staffed with one staff or only at limited times.

Citing examples of service models (Annexure D) from other centres is misleading and of little use, particularly where two of the examples cited have passengers who identify as needing boarding and disembarking assistance being located in the carriage immediately adjacent the location of the only on-board staff (train 'driver'). Arguably it is this proximity to the attendant staff that is the vital element contributing to this service model. Note that the same proximity of service provision to assistance boarding point is not replicated in the NGR service with the guard being located at the rear of the train, and some 70 meters from the designated assisted boarding point on the platform.

The NGR on-board staff (guard) is located at the rear of the train some 70 meters from long established assistance points.

Queensland Rail has, over many years, established a bench mark service model delivering reliable and consistent assisted boarding outcomes allowing patrons to travel with confidence.

It is a model that has operated for many years with great success with regular commuters and station infrastructure being designed, built and operated to deliver a consistent and usually reliable outcome.

The new NGR system, relying on a remote guard some 70 meters away removes that sense of confidence.

This is an outcome not experienced by patrons who do not rely on assistance to board. The existing platform infrastructure with varying levels and gaps require many people who use mobility aids, or who have uneven gait or poor balance to use ramps deployed by staff in order to safely board the train and access the service.

It is in the different experience of the service that the discrimination occurs.

The assertion in clause 5.1 of 5 February 2018 joint response by the State of Queensland (acting through the Department of Transport and Main Roads) and Queensland Rail that “The boarding requirements in the DSAPT are met by the current boarding assistance procedures in place for the NGR trains. Further, the joint respondents do not consider the location of the guard cab to constitute a breach of either the DSAPT or DDA.

The joint respondents believe that the current boarding assistance procedure for the NGR trains is effective in ensuring boarding assistance is provided to all customers as required.”

Now that the Commonwealth Games are over that the NGR trains be removed from service until rectified.

Pwd to travel with confidence and certainty when relying solely on the guard at the end of the train, some 75m from the assisted boarding point.

The same experience as other patrons.

Being able to travel and commute independently with confidence connects me with work, friends and family and to events I participate in for a full and ordinary life.

The loss of certainty as a consequence of a reconfigured transport and service model leaves me feeling less confident and much more vulnerable as a customer.

The service has not been improved, as one might expect from a transport upgrade, in fact the

opposite is the result, a system that operates well with xxx infrastructure and service model

Checks, balances and advice the TMR and QR ARG could provide were never sought pre-procurement.

Don't know the brief and requirements set out in tender docs are unclear

The assessment of the tenders and criteria for awarding contract

Contract conditions and allowance for variations unknown even when problems and solutions were identified.

Consultation opportunities were limited or part only, not related to whole train.

Personal assistance model as existing works well.

Confidence in travel

New personal assistance model proposed does not provide same sense of immediacy or confidence.

People make life choices based around public transport, its availability, affordability, reliability. Schools, living, access to school, work, living, leisure, connection and inclusion to community. Health services etc.

regards

Wendy

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