19 March 2021

To: DisabilityTransport@infrastructure.gov.au

Thank you for the opportunity to provide feedback on the Disability Standards for Accessible Public Transport. I note the provision of accessible versions of the documents, and the availability of multiple methods of capturing the views of people with disability.

However, the voices of people with intellectual disability will not be fully heard due to lack of resources available to provide detailed and specific responses to the over 180-page consultation paper.

Inclusion Australia, as a colleague of the Australian Federation of Disability Organisations (AFDO), supports the work of the National Inclusive Transport Advocacy Network ([NITAN](https://www.afdo.org.au/nitan/)) which aims to align transport reforms with the National Disability Strategy.

We strongly support the request from AFDO to fully fund and resource advocacy organisations so that we can adequately bring the voices of people with intellectual disability into these vital consultations.

There should also be funding for a national transport project officer through AFDO to consolidate our findings and help us engage nationally to achieve new transport standards that will implement significant changes to public transport into the future.

Some of the key aspects of any transport reform for people with intellectual disability must take into account the following:

* **Staff training** - all transit workers must be training to adequately communicate with, and not discriminate against people with intellectual disability.
* **Signage and information** - Easy Read and other accessible formats must be included for all transit signage.
* **Wayfinding** - maps need to be available in Easy Read or other accessible formats.
* **Technology** - many people with intellectual disability do not have mobile phones, or find apps accessible. Information must be available in other ways and in other formats.
* **Ticketing** - many ticketing systems are hard to understand and can serve as barriers to using public transport. Ticket gates can also serve as barriers for people with intellectual disability, and need recognition of different paces of entry, as well as clear and effective signage.
* **Enforcement** - transit security can target people with intellectual disability and impose fines, when they may face barriers to accessing the correct information about fares. There must be training and understanding about the impact of fines on people with intellectual disability.
* **Alerts and disruptions** - there needs to be specific and detailed planning to assist people with intellectual disability manage if there is an emergency, or a sudden change to a previously fixed schedule.

Planners need to include people with intellectual disability from the beginning, ensuring that their needs are considered at every stage of the transport design process.

Thanks for your consideration, and I am happy to discuss this further with you.

Kind regards

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**Catherine McAlpine**  
**Chief Executive Officer**

Inclusion Australia