



30 June 2023

RE: 2022 Review of the Disability Standards for Accessible Public Transport 2002

Dear Director of Disability and Transport Standards,

Inclusion Australia is the national Disability Representative Organisation representing the rights and interests of Australians with an intellectual disability and their families. Founded in 1954, our mission is to work to make sure people with an intellectual disability have the same opportunities as people without disability. Our strength lies in our national reach and representation. We have member organisations in New South Wales, Queensland, South Australia, Tasmania, Victoria and Western Australia. We also have Inclusion Australia staff in Victoria, Western Australia, and a branch in the Northern Territory.

We thank the Department of Infrastructure, Transport, Regional Development, Communication and the Arts (the Department) for the opportunity to submit to the 2022 Review of the Disability Standards for Accessible Public Transport 2002 (the Review).

About our submission

This submission has been co-designed with Inclusion Australia's policy officers with an intellectual disability and includes evidence provided by our Northern Territory branch (IANT). IANT will also make a separate submission to the Review highlighting key barriers and solutions to accessibility in the Northern Territory's public transport systems.

While federal, state and territory governments have done important work to increase the accessibility of public transport for people with disability, major gaps remain.

Nationally, only half of Australia's public transport infrastructure meets accessibility standards.¹ Levels of accessibility in public transport systems varies widely across jurisdictions, reflecting the lack of accountability and enforcement of the Standards in all states and territories.

¹ Xiao, A. (2026). Australia misses 20-year public transport accessibility target as many train and tram networks fail people with disabilities. *ABC News*. Retrieved from: <https://www.abc.net.au/news/2023-01-16/australia-misses-20-year-public-transport-accessibility-target/101858532>

Recent figures show that 40% of Queensland and Western Australia’s train stations, 73% of Victoria’s trams, and one-third of train and ferry stations in New South Wales are not accessible.²

This means that all around Australia, people with disability are shut out from crucial means of accessing essential services, employment opportunities and ordinary participation in society on equal basis with others.

The impacts of this are far reaching: the inaccessibility of public transport is socially and economically disabling, and—as many recent news stories from people with disability attest³—inaccessible public transport creates and exacerbates experiences of isolation and diminishes self-determination. It is both a human rights issue and a matter of public health and safety.⁴

Our transport systems are not public until everyone can use them.

In our recommendations below we highlight the ways in which the rights of people with an intellectual disability to full and effective access to public transport have still not been sufficiently addressed by the Disability Standards for Accessible Public Transport 2002 (Transport Standards).⁵

We share experiences of, and actions recommended by, people with an intellectual disability in our community. The goal of this work is to ensure that the Transport Standards meet Australia’s obligations under the United Nation Convention on the Rights of Persons with Disabilities (UNCRPD), as well as the legislative background set by the *Disability Discrimination Act 1992* (DDA).

Our member organisations have a long history of systemic advocacy for accessible and inclusive public transport in their respective states. In our recommendations below, we especially highlight the work done by the Council for Intellectual Disability (CID) in NSW and strongly endorse their positions on inclusive public transport.

² Xiao, A. (2026). Australia misses 20-year public transport accessibility target as many train and tram networks fail people with disabilities. *ABC News*. Retrieved from: <https://www.abc.net.au/news/2023-01-16/australia-misses-20-year-public-transport-accessibility-target/101858532>

³ Convery, S. (2022). Left behind: the fight for accessible public transport in Victoria. *The Guardian*. Retrieved from: <https://www.theguardian.com/australia-news/2022/jun/13/left-behind-the-fight-for-accessible-public-transport-in-victoria>;

Dennis, J. (2022). Queensland is unlikely to meet the legislated goal of having all train stations fully accessible this year. *ABC News*. Retrieved from: <https://www.abc.net.au/news/2022-03-23/qld-public-transport-disability-access-train/100913440>;

Doman, M., Scott, N., and Liu, R. (2018). The ‘unconscionable’ state of Australia’s train stations. *ABC News*. Retrieved from: <https://www.abc.net.au/news/2018-08-29/the-unconscionable-state-of-australias-train-stations/10147174>

⁴ Orr, A. (2023). There’s something ‘insulting’ about this photo. Can you spot it? *SBS News*. Retrieved from: <https://www.sbs.com.au/news/article/can-you-spot-what-is-insulting-about-this-photo/h90qxl0b5>

⁵ As per Article 3b and Article 9—United Nations Convention on the Rights of Persons with Disabilities.

We also draw attention to and strongly support the Public Interest Advocacy Centre's (PIAC) submission to the Review, particularly their key recommendations toward robust accountability and enforcement of the Standards.

Summary of our recommendations

1. Include the rights of people with an intellectual disability in the Transport Standards.
2. All information and communication relating to public transport must be freely available in inclusive formats such as Easy Read.
3. Public transport must be safe for all people, including people with an intellectual disability.
4. Greater accountability and enforcement of the Standards is urgently needed across all states and territories.
5. There should be separate, co-designed standards for air travel.


A note on accessibility

When the Review is complete, we ask that any published findings, as well as the Transport Standards themselves, be made available in Easy Read format.

This will ensure that our community can access and engage with the Review's findings and understand how any future changes to the Transport Standards will affect them. We thank the Department in advance for this.

We welcome any further opportunity to discuss the issues raised in this submission in the future.

Kind regards,



Sue O'Riley
Acting Chief Executive Officer

Recommendation 1

Include the rights of people with an intellectual disability in the Transport Standards

All people have the right to full participation and inclusion in society, and public transport is an essential way that people access and participate in economic, social, and cultural life.

While important work has been done by many state and territory governments to make public transport more accessible to people with physical and sensory disability—although gaps remain—public transport very often continues to be inaccessible to people with an intellectual disability. This is especially true for people with complex communication needs.

The needs of people with an intellectual disability are not included at all in the Transport Standards as they currently stand.

Earlier this year, we endorsed a joint position statement by our state member in NSW, the Council for Intellectual Disability (CID), calling on the Australian government and all state and territory governments to ensure the Transport Standards comprehensively address the rights of people with an intellectual disability. The statement recommended that:

Governments around Australia should be required to take actions, including:

- *Providing information about transport in Easy Read and other easy to understand formats, and ensuring information and timetables are available both digitally and in print forms, and through a phone line.*
- *Making tickets available at train stations and in ways that do not need smart devices or debit/credit cards.*
- *Testing all new transport and technologies with people with disability, early on.*
- *Ensuring all transport staff get disability awareness training, and staff are available at stations and on trains.*

We strongly support CID's call for these issues to be meaningfully addressed as a matter of urgency.

Recommendation 2

All information and communication relating to public transport must be freely available in inclusive formats such as Easy Read

A disabling barrier people with an intellectual disability face when using public transport is the inaccessibility of information and communication.

As CID highlighted in the joint position statement:

Right now, people with intellectual disability experience major barriers to using public transport. Transport information is often not provided in an accessible way.

More and more, governments are turning to confusing digital ways to share information. In many places, a smart phone or a credit card, or both, are needed just to buy or top up a travel ticket. Some people with intellectual disability do not have a smart phone or web access, and some do not have a credit or debit card. Transport staff often lack skills in communicating with people with intellectual disability.

When asked how public transport could be made more accessible for people with an intellectual disability, our community told us:

- *I don't feel there is good information using public transport. People with an intellectual disability need an easier way to understand.*
- *Make everything into Easy Read. This will help people with an intellectual disability and it will also help other people in the community, like people who don't have English as a first language.*
- *Make sure there are people to help and answer questions if we need support.*
- *Too much information on the brochures or website is confusing.*
- *The maps for buses are confusing—not only for people with an intellectual disability, but for lots of people in the community.*
- *Making complaints is not easy—there should be Easy Read instructions for how to do this. When the complaint is followed up, this should also be in Easy Read.*
- *People with an intellectual disability should be employed to test out public transport to make sure it is accessible.*

Ensuring information and communication is widely and freely available in Easy Read is not only essential for people with an intellectual disability in accessing public transport, it also assists others in the community, such as people from Culturally and Linguistically Diverse (CALD) communities.

This is also a human right encompassed by Article 21 of the UNCRPD.⁶

In 2019, CID published a report to the NSW Minister for Transport highlighting some key barriers to accessibility on the then-new Sydney Metro train.⁷ While levels of accessibility on public transport are different across jurisdictions, CID's report contains some important learnings that can be applied to different public transport systems across Australia, especially in relation to accessible information, including:

- Slow down the indicator display in the middle of the carriage to allow time for reading
- Make all signage and indicators more accessible, e.g., high contrast and big letters
- Increase the size of all maps and information
- Make emergency help points easier to find with signs.

This report also shows how important it is that **all new transport systems are tested by people with an intellectual disability** to make sure they are accessible and inclusive.

We also strongly recommend that the Transport Standards themselves be available in Easy Read, so people with an intellectual disability can access and engage with them. This will help to empower people to know and exercise their rights—an essential condition for any system that relies on complaints to maintain quality.

⁶ Article 21—Freedom of expression and opinion, and access to information. Retrieved from: <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-21-freedom-of-expression-and-opinion-and-access-to-information.html>

⁷ The report is available here: <https://cid.org.au/wp-content/uploads/2019/11/Sydney-Metro-excursion-report.pdf>.

Recommendation 3

Public transport must be safe for all people, including people with an intellectual disability

Our community has told us that very often they do not feel safe on public transport, because:

- *There is not enough accessible information available on public transport, especially when trying to plan a journey*
- *There can be a lack of staff on public transport*
- *It is not always clear how to get help*
- *There is not enough education and training for the workforce about the rights of people with disability*
- *There can be negative attitudes towards people with an intellectual disability by some people in the workforce*
- *Some buses and trains do not allow enough time to get on or off safely*
- *When there is a disruption to a service, there is often not enough information about what to do*
- *People are expected to use smartphone apps, but not everyone has a smartphone*
- *It is difficult to make complaints and have them followed up.*

Many of these issues can exist at once, compounding peoples' experiences of feeling unsafe and increasing the likelihood of experiencing discrimination.⁸ This again underscores the ways that inaccessible public transport is both a human rights issue and a matter of public health and safety.

The Transport Standards must hold public transport providers to account for making their services safe for all users. This means making sure:

- There is mandatory education and training available to the workforce about the rights of people with an intellectual disability—this should be independently

⁸ CID have also gathered evidence from people with an intellectual disability about what makes them feel safe, and unsafe, on public transport: <https://cid.org.au/our-stories/making-public-transport-inclusive-for-everyone/>

designed and delivered by people with an intellectual disability and properly remunerated

- Public transport is appropriately staffed at all times
- There are clear, easy ways to get help and support when people need it
- There is a clear, easy way to make a complaint and have it followed up in a timely manner
- All information and communication is accessible to people with an intellectual disability (as per recommendation 2).

Recommendation 4

Greater accountability and enforcement of the Standards is urgently needed across all states and territories

We strongly agree with the Public Interest Advocacy Centre's (PIAC) submission to the Review, which talks in detail about the ways the current Transport Standards have not been effectively enforced.

Like PIAC, we are concerned that the Transport Standards rely too heavily on a complaints-driven process to be enforced in any meaningful way. This is especially problematic if the complaints mechanisms (including the Standards themselves) are inaccessible, since they are not currently available in accessible formats like Easy Read.

A process that relies on individuals who experience discrimination to hold the discriminator to account—coupled with the utter lack of a complaints mechanism that is accessible to people with an intellectual disability—is unjust and ineffective.

It also ignores the clear power imbalance that exists between people with an intellectual disability and those in positions of power operating complaints mechanisms. Because of this, and the general inaccessibility of complaints processes across jurisdictions, the process of making complaints tends to be disempower people with an intellectual disability.

Therefore, we strongly endorse PIAC's robust recommendations that:

- The Australian Human Rights Commission be funded to provide independent oversight of industry compliance with the Transport Standards (Recommendation 9, page 13)
- The Australian Human Rights Commission be empowered and funded to enforce the Transport Standards (Recommendation 10, page 13).

Other ways to strengthen accountability and enforcement of the Standards include:

- Investment in mandatory education and training opportunities to the public transport workforce about the rights of people with an intellectual disability—this should be independently designed and delivered by people with an intellectual disability and properly remunerated
- Making the Transport Standards themselves available in Easy Read formats so everyone can access them and be aware of their rights.

Recommendation 5

There should be separate, co-designed standards for air travel

We believe that the current Transport Standards do not adequately cover the accessibility needs of people with an intellectual disability when using air travel. While air travel is not generally considered to be ‘public transport’, it is a large transport system supporting Australia’s population and under the DDA it should be accessible to people with disability as well.

We endorse PIAC’s recommendation that there should be separate, co-designed standards for air travel. We especially support their argument, which has been made in previous submissions, that:

Air travel encompasses a number of elements including booking a ticket, checking-in, transportation of mobility devices, security screening, moving within the terminal, boarding and disembarking aircraft. Each of these elements can present access difficulties for people with disability. The Transport Standards fail to adequately account for and address all these elements of air travel, and the level of complexity passengers with a disability encounter when travelling by air. (PIAC, Submission to 2022 Review of the Transport Standards, page 16).

Our community has told us about the inconsistent levels of accessibility on different airlines, aircrafts, and airports around the country, and the many barriers that limit access to air travel.

Some of those barriers are similar to those described on page 8 of this submission, but many are unique to air travel, including:

- Check-in processes are usually automated and there tends to be a lack of staff to assist passengers who might need support
- Airport and airline staff lack awareness and training about the rights and support needs of people with an intellectual disability
- Communication and information across airports and airlines, as well as ticketing processes, is inaccessible
- Security screenings can be distressing, and there is often not enough information provided to passengers

- Technologies provided on airlines are not easy to use and can be especially difficult for people with an intellectual disability and people with complex communication needs.

In their current form, the Transport Standards are not fit for purpose for air travel. We believe it is imperative that a separate set of standards be created to cover air travel, and that these be codesigned by people with disability, including people with an intellectual disability.