

National Transport Commission and the  
Department of Infrastructure, Transport, Regional Development,  
Communication and the Arts  
[automatedvehicles@ntc.gov.au](mailto:automatedvehicles@ntc.gov.au)

10 June 2024

Dear Commission Members,

**RE: QDN Response to the Automated vehicle safety reforms Public consultation 2024**

Queenslanders with Disability Network (QDN) is pleased to provide this brief response to the National Transport Commission and the Department of Infrastructure, Transport, Regional Development, Communication and the Arts with regards to the Automated vehicle safety reforms Public consultation 2024. QDN supports the overall intent of the consultation paper to improve the safety of Australians as automated vehicles (AVs) enter the market.

**Background and Context**

Queenslanders with Disability Network (QDN) is an organisation of, for, and with people with disability. The organisation's motto is "nothing about us without us". QDN operates a state-wide network of over 2,000 members and supporters who provide information, feedback and views from a consumer perspective to inform systemic disability policy and disability advocacy.

**QDN response**

It is broadly acknowledged that people with disability face risks, barriers and impacts in relation to many areas of their lives that people without disability do not. These risks, barriers and impacts are further compounded when systems and structures such as transport are designed in ways that exclude people with disability and further isolate them.

QDN commends the consideration of people with disability in the consultation paper and encourages ongoing engagement with people with disability to leverage the opportunities AVs bring in creating access and inclusion.

In making this brief submission QDN acknowledges the tireless work of QDN Life Member John McPherson for his expertise in accessibility standards in general, but particularly the importance of people with disability having access to reliable, accessible and safe transport experiences. John's knowledge and professional work in this space informs this submission and influences the future provision of accessible transport.

The roll-out of AVs in Australia including associated reforms must be within a human rights framework, particularly regarding the use of AVs in public transport. To this end AVs must conform to requirements of the Disability Discrimination Act, the Queensland Anti-Discrimination and Human Rights Acts, the Disability Standards for Accessible Public Transport and the Australian Design Rules for public transport such as buses and trains.

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Universal Access and Universal Design are best achieved through co-design with people with disability. This engagement is good practice that inevitably leads to outcomes that benefit the public in general. Accessibility of the boarding and alighting points for AVs must be considered and co-designed with people with disability and all stakeholders. These points must conform with the Disability Standards for Accessible Public Transport (DSAPT) and must be recognisable by the AV. Boarding and alighting points must be connected to surrounding precincts by access paths that conform to the AS 1428 suite of Australian Standards and relevant Austroads Guidelines. Precise positioning will be essential if people with vision or cognitive impairments are to be confident that the AV will arrive at their precise location and will take them precisely to the point where they wish to alight. Development of this guidance is best addressed by a co-design process involving all stakeholders. QDN members recommend reviewing driverless trains operating on the Sydney Metro lines to draw lessons from this system.

It is highly unlikely that people with a disability who currently require staff assistance to board a vehicle will be able to independently board an unstaffed AV or operate onboard safety such as seat belts and wheelchair restraints or for people with vision or cognitive impairments to know if their journey has started or finished. The on-board customer service role for an AV is therefore likely to be a high employment priority in future. Disability awareness training will be a high priority for these staff. Design of this training is best undertaken as a co-design project involving all stakeholders.

The ability to hail or book an AV service or any associated technology to operate an AV must not be limited to smartphones. A digital divide already exists and over reliance on new or existing digital systems risks exacerbating this divide. The 2023 Australian Digital Inclusion Index (ADII)<sup>1</sup> highlights that the national standard of digital inclusion in Australia (measured across the dimensions of access, affordability, and digital ability) has, overall, continued to improve in line with nation-wide uplifts in digital participation. However, people with disability remain one of the most digitally disadvantaged cohorts when it comes to digital inclusion, most notably in terms of digital ability and affordability.

In the implementation of AV reform, consideration is required to implement a robust education and awareness raising campaign around changes to safety and legislation and the impact of AVs on people with disability. QDN recommends strategies include:

- Co-design of education and awareness raising strategies and actions with people with disability
- Communications materials available in all accessible formats.

Thank you for this opportunity to present this submission regarding the Automated vehicle safety reforms Consultation paper 2024.

We look forward to hearing the outcomes and QDN is happy to provide further advice if required. Please call us on 07 3252 8566 or email [qdn@qdn.org.au](mailto:qdn@qdn.org.au) if you require further information on our submission.

Yours sincerely,



Michelle Moss  
Chief Executive Officer  
Queenslanders with Disability Network

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<sup>1</sup> Australian Digital Inclusion Index <https://www.digitalinclusionindex.org.au>