

22 October 2021

By email

Public Transport Inclusion
Department for Infrastructure and Transport
DIT.PublicTransportInclusion@sa.gov.au

**Submission re: South Australian Public Transport Diversity and Inclusion Framework
(2021-2026)**

To the Public Transport Inclusion team,

Thank you for the opportunity to make this submission regarding the South Australian Public Transport Diversity and Inclusion Framework (2021-2016).

This submission is being made on behalf of the South Australian Rainbow Advocacy Alliance (SARAA), a community led organisation that advocates for the rights and wellbeing of lesbian, gay, bisexual, transgender, intersex, queer and asexual (LGBTIQA+) South Australians.

It's informed by our lived experience as LGBTIQA+ South Australians, with input from our [LGBTIQA+ Community Advisory Group](#), a diverse collective voice for the LGBTIQA+ community in public policy and decision-making, established with funding from the Department of Human Services SA (DHS).

We are deeply disappointed to see the Public Transport Diversity and Inclusion Framework makes little to no meaningful mention of the needs of LGBTIQA+ South Australians. While we're mentioned in the definitions of diversity, inclusion and intersectionality, the Framework makes no mention of our communities in its outcomes and actions. This is particularly disappointing given the inclusion of a rainbow symbol on the cover page of the Framework, a gesture that could be considered tokenistic and misleading.

LGBTIQA+ South Australians continue to experience discrimination, harassment, violence and assault in public spaces, including public transport. *Private Lives 3 (2020)*,¹ Australia's largest national survey of the health and wellbeing of LGBTIQ+ people to date, found that less than one

¹ Hill, A. O., et. al. (2020). *Private Lives 3: The health and wellbeing of LGBTIQ people in Australia*. Melbourne, Australia: Australian Research Centre in Sex, Health and Society, La Trobe University: Melbourne. Available at www.latrobe.edu.au/arcs/hs/publications/private-lives/private-lives-3.

third of participants felt accepted in public spaces. Similarly, *Writing themselves in 4 (2021)*,² the largest ever study on the experiences of Australian LGBTQA+ young people aged 14-21 found that two-fifths of South Australian participants reported experiences of verbal harassment based on their sexuality or gender identity in the past 12 months. Of these, 19.% (n = 119) reported experiencing verbal harassment based on their sexuality or gender identity in the past 12 months in public spaces, including transport.

This statistics reflect the experiences of our LGBTIQ+ volunteers, with members stating:

“I always feel uneasy using public transport to get to queer events like Pride March, especially when I’m decked out in rainbow gear. There’s often no security. Even if there was, I’m not sure they’d respond to transphobic abuse. It’s hard to feel Pride when you don’t feel safe simply trying to get places.”

- 27 year old non-binary Seaford line train commuter

“One of the first times I presented feminine in public was on the train to Adelaide. A man sitting close to me stared at me for ages, and then started insisting I was a man.”

- 34 year old transgender woman and train commuter

While there is little research that explicitly explores the experiences of LGBTIQ+ South Australians on public transport, we have seen media coverage from interstate showing how risky it can be for people from our communities. [This article from The Age](#) describes the harrowing sexual, verbal and physical abuse experienced by a transgender woman in Melbourne,³ and we have heard similar stories from trans and gender diverse people in Adelaide. More must be done to keep our communities safe from this unacceptable behaviour when using public transport.

We recognise a key reason for the invisibility of LGBTIQ+ communities in the Framework is a lack of data including LGBTIQ+ identities. LGBTIQ+ South Australians aren’t properly counted in government statistics which not only invalidates and perpetuates feelings of invisibility for LGBTIQ+ people, but means we’re often invisible in strategies and services, and left behind in policies and programs that impact our lives. This includes in Australian Bureau of Statistics data that the Framework’s Adelaide Metro Network Profile and Priority Groups are based upon. To address this issue, both the Australian Bureau of Statistics and Department of Human Services SA have published guidelines in relation to the collection of sex and gender data. We strongly encourage the Department for Infrastructure and Transport to implement the DHS Data Collection and Gender Guideline across its organisation.

² Hill, A. O., et. al. (2021) *Writing Themselves In 4: the health and wellbeing of LGBTQA+ young people in Australia. South Australia summary report*. Australian Research Centre in Sex, Health and Society, La Trobe University: Melbourne. Available at www.latrobe.edu.au/arcs/shs/publications/writing-themselves-in-publications.

³ Jack, T. 4 February 2019. ‘I take a risk when I get on’: Transgender commuters describe life on public transport’. www.theage.com.au/national/victoria/i-take-a-risk-when-i-get-on-transgender-commuters-describe-life-on-public-transport-20190201-p50v1x.html

We encourage you to seek out opportunities and strategies to create a safer and more inclusive public transport system for LGBTIQ+ South Australians. This includes through the provision of LGBTIQ+ inclusivity training for your staff, the creation of guidelines for staff regarding how to support LGBTIQ+ commuters and through the development of targeted safety and inclusion campaigns on South Australian public transport services.

We strongly encourage the Department for Infrastructure and Transport to consult further with LGBTIQ+ South Australians about their needs in accessing public transport, and request the Department consider LGBTIQ+ as a priority group within the Framework.

For more information about the issues LGBTIQ+ South Australians face, we urge you to read our 2021 LGBTIQ+ Community Advisory Group report, delivered to the Strategy and Engagement division at Department of Human Services SA in July 2021, which outlines the key priorities for LGBTIQ+ inclusion, health and wellbeing in South Australia under the themes of:

- Represent and lead for our communities
- Advance our equality and safety under the law
- Include and respect us in the services we access
- Improve our health and wellbeing.

Thank you again for the opportunity to comment on the Public Transport Diversity and Inclusion Framework. We would be very happy to discuss these matters with you further. We are also willing to assist you with consulting further with LGBTIQ+ South Australians through our LGBTIQ+ Community Advisory Group.

If you wish to discuss these matters further, please contact me at info@saraa.org.au.

We will also make this submission publicly available to ensure our members and supporters are aware of our position on this Framework.

Kind regards,

Kelly Vincent they/ them or she/ her

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SARAA acknowledges and pays respects to the Kaurna, Nukunu and Ngarrindjeri people, whose land we operate and live on. Aboriginal land was stolen, never ceded, and we stand in solidarity with First Nations people, especially those who are also members of the LGBTIQ+, Brotherboy and Sistergirl communities.