



Stage 2 Areas of Reform of the Transport Standards



Opportunities for change

Reporting compliance and accessibility

1. Set requirements for [reporting](#) compliance with the Transport Standards.
2. Set new requirements for [communicating accessibility of public transport](#) sites to the public.

Scope of conveyances

3. Address the uncertainty around the requirements for [rideshare](#) services.
4. Remove the exemptions for [dedicated school buses](#) relating to mobility aid access.

Implementation of requirements

5. Increase confidence in using [equivalent access](#) solutions while assuring equivalent access does not lead to reduced accessibility.
6. Determine whether and how the new or amended requirements should apply to [existing assets](#), including public transport infrastructure, conveyances and premises.

Accessible boarding points and boarding devices

7. Ensure the [identification of lead bus stops](#) is consistent.
8. Clarify technical issues relating to [boarding points](#) for ferries, light rail, trams, and buses, such as gradient and cross fall requirements.
9. Provide information on [nominated assistance points](#) where passengers can obtain direct assistance and boarding assistance where independent boarding cannot be achieved

10. Clarify requirements for [signals to request boarding assistance](#), and update Australian Standards references.
11. Ensure [portable boarding devices have edge barriers](#) to improve safety and confidence for users.
12. [Define removable gangways](#) used in a marine environment separately from a boarding ramp used in a terrestrial environment.
13. Set [specifications for removable gangways](#) that are distinct from boarding ramps for pedestrians.

Signs, symbols, braille and raised lettering

14. There is an opportunity to adopt more current Australian Standards references relating to [height and illumination of signs](#).
15. There is an opportunity to adopt more current Australian Standards references relating to [location of signs](#).
16. There is an opportunity to adopt more current Australian Standards references relating to [symbols](#).
17. Set the standard and complexity of [braille and raised lettering](#) on signage.
18. Specify the standard of braille expected when [braille information](#) is provided.

Information and communication technology (ICT) and fare systems

19. Ensure [fare payment and validation systems](#) are accessible and update the Transport Standards to reflect the use of digital technology.
20. Set clear requirements for the [location of fare system elements](#), such as access gates, platform validators, validation devices or check-in elements in airports.
21. Set minimum accessibility requirements for [ICT procurement](#).

Waiting areas and appropriate seating

22. Clarify the proportion of [allocated spaces in waiting areas](#) and define a waiting area.
23. Specify the proportion of [priority seats in waiting areas](#).
24. Clarify the existing requirement to hold accessible seats for booked services, and provide a definition of [appropriate seats to be held](#).

Lifts

25. Update the Australian Standards reference to AS1735.12 (2020) and adopt further accessibility requirements for [Lifts](#) such as audible landing and wayfinding information, tactile landing identification, emergency communication, and audible information for hearing aid users.
26. Set minimum clear width requirements for [escalators and travellers](#).

Safety on board conveyances

27. Define and identify a technical standard for [active restraints](#) and outline when they are mandatory
28. Define [passive restraints](#) and how allocated spaces should contain the movement of a mobility aid.
29. Require [conveyances to dwell at stops](#) to ensure passengers can safely be seated.
30. Provide layout and luminance contrast requirements for [grab-rails in allocated spaces](#).

Conveyance and infrastructure access paths

31. Ensure [flange gaps](#) along access paths in train, light rail and tram networks can be safely navigated by pedestrians.
32. Specify standalone requirements to ensure [continuous access on access paths](#).
33. Require stair and ramp [handrails to continue through over-bridges and subways](#).
34. Set accessibility requirements for automating [doors on access paths](#).
35. Set requirements for the inclusion of [allocated spaces at rest points](#) along access paths.
36. Address references to out-of-date Australian Standards for [stairs on conveyances](#).
37. Set luminance contrast and height requirements for [doorways on conveyances](#).
38. Set requirements for [grabrails in conveyances](#) along access paths.

Toilets, taxi ranks, loading zones and parking spaces

39. Set specifications for [taxi ranks](#) to ensure they are accessible.
40. Recognise [on-street passenger loading zones](#) as wheelchair accessible taxi and small conveyance boarding points.
41. Require [off-street car parking areas](#) have accessible parking spaces and access paths that minimise travel distance to entries.
42. Ensure [left and right hand toilets](#) are provided in equal proportion.
43. Set requirements for accessible [ambulant toilets](#).
44. Require [emergency call buttons in toilets are](#) reachable from floor and pan.

Information and communication

45. There is an opportunity to adopt more current Australian Standards references relating to [hearing augmentation in infrastructure and premises](#) to align with the Premises Standards and reference assistive listening systems.
46. Set best practice requirements for [print size and format](#).
47. Clarify the requirement to [provide information](#) in a reasonable period of time.
48. Set minimum accessibility requirements for [mobile web systems](#).
49. Ensure passengers can [communicate in real time](#) with public transport operators prior to boarding, in transit, and after alighting.
50. Ensure passengers have equal access to information concerning their [location during journey](#) through visual and audio formats.

51. There is an opportunity to adopt more current Australian Standards references relating to [hearing augmentation on conveyances](#).
52. There is an opportunity to adopt more current Australian Standards references and clarify the existing requirements for [boarding and alighting assistance](#).

Lighting

53. Update [lighting](#) requirements to modern requirements that take into account new research on lighting temperature, consistency, type, placement and effect on materials.
54. Reference a methodology for [calculating luminance contrast for poles and obstacles](#) and identify surfaces against which objects must luminance contrast.

More information: Issues

1. Reporting

There are no reporting requirements or provisions in the Transport Standards. The Australian Government currently collects transport compliance data through submissions to reviews of the Transport Standards, however this approach is leading to provision of inconsistent data which is mainly qualitative and does not allow for a nationally consistent view on compliance reporting for Australia's public transport networks.

2. Communication of accessible features

The Transport Standards lack universal definitions regarding accessibility and accessible features. As a result, transport providers and government agencies communicate the accessible features of their networks differently. The Transport Standards also do not include guidance on what accessible features of public transport networks or accessible amenities of specific infrastructure or premises are available for customers.

3. Rideshare

The Transport Standards are not explicit about whether rideshare services are covered and there is a lack clarity for some operators and providers as to their obligations and legal requirements under the *Disability Discrimination Act 1992*.

4. Dedicated school buses

Whilst route bus services are included under the Transport Standards, dedicated school bus services are exempt from certain requirements for buses. This impacts students with disability and their families who may potentially face discriminatory outcomes in relation to access to school and other extracurricular activities or where a parallel service is used.

5. Equivalent Access

While equivalent access was intended to provide public transport operators and providers the flexibility to use accessible innovative solutions and to respond to situations where compliance with the technical standards is difficult, there are a number of issues identified with using equivalent access in practice:

- Limited application and effectiveness in practice
- Lack of certainty and assurance
- Lack of guidance around successful consultation to reach equivalent access solutions
- Lack of understanding of co-design
- Lack of clarity around requirements for small-scale projects versus large-scale projects.

6. Existing Assets

There is uncertainty regarding how implementation of any new requirements in the Transport Standards will apply to existing assets (assets in service prior to a revised Transport Standards coming into effect).

There are two considerations to be addressed:

- Whether amendments should be applied prospectively or retrospectively, including whether compliance target dates for specific elements of the Transport Standards, rather than upgrading assets holistically, is an appropriate mechanism for reaching compliance.
- The potential overlap between the existing implementation timeframes set out in the 2002 Standards' Schedule for trains and trams and any potential new compliance target dates for amendments agreed through the current reform process.

7. Identification of lead stops

A 'lead stop' is a bus stop designed with a single platform boarding point for passengers wherein buses queue behind each other (as opposed to independent designated stops for different services). The Transport Standards have no technical specifications for how passengers with a disability are to identify lead stops at bus stations, bus interchanges and bus zones. Identifying lead stops can be problematic when it comes to service recognition, moving to the right location on the platform and hailing the driver¹.

8. Boarding points

Pontoon boarding points

The Transport Standards require that boarding points have a 'firm and level surface to which boarding a device can be deployed'². This definition is problematic when pontoons are used as boarding points because it does not acknowledge that they are located in a dynamic environment. What constitutes 'firm and level' is not clearly defined. Pontoons are subject to wind, wave and wash and so are not always a completely stable boarding point.

¹ The Department of Infrastructure, Transport, Regional Development and Communications, The Whole Journey: A Guide for thinking beyond compliance to create accessible public transport journeys, 21 October 2021, <https://www.infrastructure.gov.au/transport/disabilities/whole-journey/guide/3-5-interchange.aspx>

² Federal Register of Legislation, Disability Standards for Accessible Public Transport 2002 (Transport Standards), Section 8.1(1), Boarding points and kerbs, 21 October 2021, <https://www.legislation.gov.au/Details/F2011C00213>

Bus, tram and light rail boarding points

The Transport Standards require that boarding points have a ‘firm and level surface to which a boarding device can be deployed’³. This definition is problematic for boarding points for buses, trams and light rail as it does not acknowledge topographical issues or provide gradient and crossfall requirements.

Hail-and-ride service boarding points

The Transport Standards do not provide adequate requirements for boarding and alighting when using hail-and-ride services. The Transport Standards offer no performance requirements for nominated accessible boarding points apart from the ‘firm and level’ criterion of Section 8.1, Boarding points and kerbs. No mention is made of how this will be achieved if the boarding point is on the carriageway making it difficult for passengers to board and alight.

9. Nominated assistance points

Areas for accessing public transport conveyances, such as a train platform, can be large, long, and crowded. This can make it difficult for customers to know where to seek direct assistance for boarding assistance, the provision of a boarding ramp, direction to further accessible facilities, and information more generally. Further, public transport employees need to know where customers requiring direct assistance might be located.

This can lead to customers that require direct assistance not receiving such assistance in a timely manner, potentially resulting in them being rushed or not being boarded in time for a particular public transport service. This problem is compounded with premises which are not staffed, whereby a customer relies on the driver, guard or conductor of a conveyance to identify a customer that requires direct assistance.

10. Signals to request boarding assistance

The Transport Standards do not provide sufficient clarity and requirements for signals used to request boarding assistance so that all passengers can successfully request a boarding device.

Furthermore, there is an opportunity to adopt more current Australian Standards in the section of the Transport Standards which covers signals requesting boarding devices.

11. Portable boarding edge ramp barriers

Edge ramp barriers are an important safety and confidence building feature, however they are not required in the current Transport Standards. The referenced standard only requires edges for ramps with a vertical rise greater than 400mm which is seldom encountered in the built urban environment. Requirements for edge barriers will improve safety and confidence for mobility aid users.

12. Define removable gangways

The Transport Standards are silent on the difference in geometry and function between removable gangways and boarding ramps. Removable gangways must be able to maintain two points of contact on moving pontoon and ferry decks. They must also accommodate lateral movement of the ferry to and from the pontoon. This cannot be achieved with a flat boarding ramp.

³ Federal Register of Legislation, Transport Standards, Section 8.1(1), Boarding points and kerbs, 21 October 2021, <https://www.legislation.gov.au/Details/F2011C00213>

13. Specifications for removable gangways

The Transport Standards are silent on removable gangway design specifications that ensure that they are fit for purpose in their unique operating environment. This is despite vehicle boarding ramps operating in a static onshore environment and removal gangways operating in a dynamic marine or riverine environment. Both ferry and pontoon may be rising and falling vertically while the ferry is simultaneously moving laterally.

14. Height and illumination of signs

There is an opportunity to adopt more current Australian Standards references for height and illumination of signs.

15. Location of signs

There is an opportunity to adopt more current Australian Standards references for placement of signs in infrastructure and premises.

16. Symbols

There is an opportunity to adopt more current Australian Standards references for the design of international symbols for accessibility and deafness.

17. Braille and raised lettering on signs

The Transport Standards provide few requirements on the standard and complexity expected of braille and raised lettering, including:

- The standard of braille and tactile text is not specified and does not reflect best practice.
- The Transport Standards do not distinguish between the requirements for identification signage required under the Disability Standards (Access to Premises) 2010 (Premises Standards) and other signage being delivered in these formats for information or instructions.
- The Transport Standards do not align with requirements for the Premises Standards and National Construction Code.

18. Braille information

Transport Standards do not provide a standard or complexity expected of braille when used to provide information.

19. Fare payment systems

Fare systems have dramatically changed since the inception of the Transport Standards with operators and providers introducing a range of modern electronic and digital devices and payment tokens to facilitate fare payment and validation. The Transport Standards do not adequately cover or support the existing or future technologies. As a result, current fare system requirements may not be fit-for-purpose, and customers with disability may be exposed to inaccessible or inconsistent fare systems.

20. Location of fare system elements

The Transport Standards contain limited clarity regarding the specific location of fare system elements and correct placement of devices to ensure they are located and oriented to facilitate, and not obstruct access. Without consistent and clear requirements to be applied by operators and providers, passengers with disability may be met with an inconsistent and potentially inaccessible travel experience that will prevent some people travelling independently.

21. Procurement of information communication technologies (ICT)

The Transport Standards do not provide minimum accessibility requirements for ICT procurement. This results in inconsistency of ICT procurement across Australia, which includes ICT hardware, services and software.

22. Allocated spaces in waiting areas

The Transport Standards do not provide sufficient clarity on:

- the proportion of allocated spaces required in a waiting area that provides seats
- the nature and extent of the waiting area.

This may lead to the proportion of allocated spaces provided in each waiting area to be insufficient.

23. Priority seats in waiting areas

The Transport Standards do not provide sufficient clarity on:

- the proportion of priority seats required in waiting areas
- how a single bench seat should be designated as priority
- the nature and extent of the waiting area.

This may lead to the proportion of priority seats provided in each waiting area to be insufficient.

24. Appropriate seats on booked services

The Transport Standards require accessible seats to be held until last in the booking process, however these requirements are no longer fit for purpose as they do not account for modern booking systems where passengers can choose their own seats. Furthermore, the definition of an 'accessible seat' is unclear.

25. Lifts

There is an opportunity to adopt more current Australian Standards references to capture technological advances that are becoming standard practice.

The Transport Standards do not provide any requirements or sufficient requirements:

- For **audible wayfinding and information in cars** to provide information to passengers when exiting a lift so that they can be certain about which landing a lift car has arrived at or which way they need to go to continue their journey.
- For **braille and tactile signs on lift landing door frames** so that people who are deaf and blind can use these signs as a useful orientation aid
- To ensure **passengers can communicate with staff in an emergency** and receive a message confirming their call so that people who are deaf, hard of hearing, speech impaired or non-verbal can be assured their call has been received and is being acted upon

- For **lift car communication and information systems** to ensure all passengers (particularly people who are hard of hearing and who also have vision impairments) receive equal access to information while traveling in lift cars.

26. Escalators and travellers

The Transport Standards are silent on the minimum clear width requirements for escalators and inclined travelators. This may result in safety and space requirements of people with disability not being met.

27. Active restraints

The lack of active restraints on conveyances has been raised as a safety hazard which can cause mobility aids to tip in transit, injuring the passenger, or passengers around the allocated space. The Transport Standards lack technical standards for active restraints and clarity as to whether active restraints are mandatory.

28. Passive restraints

The Transport Standards do not adequately define passive restraints and are vague on how an allocated space is to contain the movement of a mobility aid towards the front or side of a conveyance, leading to situations where allocated spaces do not adequately contain mobility aid movement.

29. Dwell times

The Transport Standards do not include requirements for conveyances to wait at stops until passengers are safely located which has safety implications for all passengers.

30. Grabrails in allocated spaces

The Transport Standards do not provide sufficient clarity and guidance on the location, layout and luminance contrast of grab rails in allocated spaces so that the configuration of grab rails are consistent and clearly identifiable for all passengers.

Furthermore, there is an opportunity to adopt more current Australian Standards references for grab rails in allocated spaces.

31. Flange gaps

Pedestrian level crossings include a 'flange gap' which is the gap between the rail track and road that permits train or tram wheels to safely travel through a level crossing. Flange gaps are fundamental parts of train, tram and light rail networks and form part of an access path in many locations across Australia.

The Transport Standards do not reference or acknowledge level crossings or flange gaps. This creates:

- safety hazards for pedestrians when using the access paths at level crossings due to the presence of flange gaps
- ambiguity around compliance requirements for public transport operators and providers with the Transport Standards in its current form, due to the omission of flange gaps.

32. Continuous access on access paths

There is an opportunity to adopt more current Australian Standards references for continuous accessibility on access paths.

33. Continuous handrails on overbridges and subways

The Transport Standards currently have no requirements for handrails to be continuous through an overbridge or subway. While the Transport Standards require handrails to be provided along access paths 'wherever passengers are likely to require additional support or passive guidance'⁴, these places are not specified, rather designers are given the flexibility to decide case by case.

34. Doors on access paths

The Transport Standards do not provide sufficient clarity and requirements for the type of door (e.g. automatic, power assisted or manual) to ensure the current intent of 'not presenting a barrier' is achieved. Toilet doors in particular can be difficult for people using mobility aids or for their carers to open and hold open while entering and exiting.

35. Allocated spaces at rest points

The Transport Standards have no requirements for providing allocated spaces at resting points. This results in inaccessible outcomes for people, specifically mobility aid users, who require access to rest points.

36. Stairs on conveyances

Trains

The Transport Standards reference out-of-date standards and due to space constraints in rails cars, compliance with the current technical standards is difficult and often not achievable. Additionally, there are no specific requirements for stairs on trains, rather the requirements cover multiple modalities.

Ferries

The Transport Standards reference out-of-date standards and there are no specific requirements for internal ferry stairs, rather requirements cover multiple modalities.

Buses

The Transport Standards have requirements for internal bus stairs but none for internal or entrance steps. The requirements reference out-of-date standards and the handrail requirements are inadequate and contradict industry standards.

⁴ Federal Register of Legislation, Transport Standards, Section 11.2, Handrails to be provided on access paths, 21 October 2021, <https://www.legislation.gov.au/Details/F2011C00213>

37. Doorways on conveyances

The Transport Standards do not include luminance contrast and minimum height requirements of doors on conveyances. Such provisions would improve safety and wayfinding features for people who are blind or who have low vision.

38. Grabrails in conveyances

The Transport Standards are silent on the provision of grab rails along access paths on conveyances (except that they must have a luminance contrast with a background by at least 30%). Passengers who are ambulant would benefit from grabrail support while travelling either way between the conveyance door and the priority seating.

39. Taxi ranks

The Transport Standards are silent on the design of taxi ranks and what proportion of spaces in the rank should be accessible to people who use mobility aids and who must board wheelchair accessible taxis (WATs). Additionally, the Transport Standards do not provide sufficient accessibility requirements for on-street taxi ranks to ensure loading spaces are accessible for wheel chair accessible taxis.

40. On-street passenger loading zones

The Transport Standards do not provide sufficient accessibility requirements for identified on-street passenger loading zones to ensure loading spaces are accessible for wheel chair accessible public transport vehicles.

41. Off-street car parking areas

The Transport Standards are currently silent on off-street parking areas associated with public transport infrastructure and have no requirements or specifications for accessible parking spaces or the access paths connecting them to accessible entrances.

42. Left and right hand toilets

Depending on which hand and arm are most functional, people will choose to use a left hand toilet (pan to the left of the wheelchair) or right hand toilet (pan to the right of the wheelchair).

There are currently no requirements in the Transport Standards for equal or near equal proportions of left or right-handed accessible toilets in ferries or trains. Rather, they simply require that an accessible toilet be provided in addition to any other toilets or as the only toilet.

43. Ambulant toilets

The Transport Standards have no requirements for toilets for people with ambulant disabilities ('ambulant' toilets) in conveyances, infrastructure or in premises to which the Premises Standards do not apply. This may result in the provision of accessible toilets for people with ambulant disabilities being inadequate.

44. Emergency call buttons in toilets

The Transport Standards do not provide sufficient guidance or requirements to ensure there are sufficient number and accessibly located emergency call buttons in accessible toilets so that they are reachable by a passenger who has fallen.

45. Hearing augmentation in infrastructure and premises

There is an opportunity to adopt more current Australian Standards references for covers hearing augmentation in infrastructure and premises. Furthermore, the current referenced Australian Standard does not include contemporary references to the various assistive listening systems that people use.

46. Print size and format

The Transport Standards do not specify requirements for size and format of large print, such as semi-bold or font weight and left justification with ragged right margin, which is considered current best practice.

47. Timely provision of information

Although the Transport Standards cover provision of information in passengers' preferred formats, the Standards do not require that:

- direct assistance be provided if information is unavailable in a preferred format and is required at the moment of inquiry
- information be provided in a timely manner in preferred format if not immediately required
- less commonly requested information is production ready in anticipation of a request.

48. Mobile web systems

Transport operators and service providers are increasingly using online systems such as mobile phone applications (Apps) and websites to communicate service information with customers.

The current Transport Standards do not reflect industry standards around minimum requirements for App and mobile website accessibility. Given there are different levels of accessibility available, a minimum standard should be adopted to provide certainty to customers around access to information and to operators and service providers about their obligations to provide accessible information.

49. Real time communication

The Transport Standards do not currently require real-time communication between operators or providers and their passengers with a disability while the latter are undertaking a public transport journey. Real-time communication would allow passengers time to receive information, plan and successfully complete their journey, give feedback or make any necessary request for assistance after alighting.

50. Location during journey

While the Transport Standards require that all passengers have equal access to information concerning their location, not all formats of information are accessible to people who have sensory or cognitive disabilities. For example, visual information and audio announcements that convey alighting information would promote all passengers having equal access to information concerning their location. Furthermore, information on which exit to use when alighting is not required by the Transport Standards.

51. Hearing augmentation on conveyances

There is an opportunity to adopt more current Australian Standards references for hearing augmentation in conveyances. Furthermore, the current referenced Australian Standard does not include contemporary references to the various assistive listening systems that people use.

52. Boarding and alighting assistance

The Transport Standards do not provide sufficient clarity and flexibility for a passenger to notify of the need for boarding assistance, including how much notice they are required to give. The current Transport Standards conflate requirements for passengers requesting boarding devices at infrastructure and premises with those on board conveyances. Furthermore, there is an opportunity to adopt more current Australian Standards references for notification by passenger of need for boarding assistance.

53. Lighting

The lighting requirements in the Transport Standards are based on standards from the early 1990's. The current standards do not take into account emerging research on lighting temperature, consistency, type, placement and the effect of materials. The Standards do not:

- provide adequate guidance for lighting designers to deliver appropriate lighting solutions for the diverse and nuanced requirements of people with disability
- reflect the unique safety, contextual and operational requirements of the public transport environments.

54. Calculating luminance contrast for poles and obstacles

The Transport Standards requires 30% luminance contrast with a background for 'obstacles that abut an access path'. However, the Transport Standards do not provide a process for determining luminance contrast and do not detail which background surfaces must contrast with poles or obstacles.

More information

For more information about the Transport Standards reform process, visit the Department of Infrastructure, Transport, Regional Development and Communication's website at:

<https://www.infrastructure.gov.au/infrastructure-transport-vehicles/transport-accessibility/reform-disability-standards-accessible-public-transport-2002/stage-1-reforms>.