

DoT – On-demand Transport Input: Reform of the Disability Standards for Accessible Public Transport: Consultation Regulation Impact Statement

4. Staff Training and Communication

Which option do you prefer: regulatory, non-regulatory or status quo?

Regulatory – in relation to the training of staff by providers of passenger transport services, which in the on-demand space are private operators.

Non-regulatory – in relation to the training of government agency staff who deal with the industry providers and therefore indirectly with their passenger customers.

What disability awareness training do you provide to frontline and back of house staff?

Regulation 35 of the *Transport (Road Passenger Services) Regulations 2020* requires that drivers providing a passenger transport service in a wheelchair accessible vehicle (WAV) demonstrate a level of competence in the safe loading, restraint and unloading of a person in a wheelchair. This can be done via a formal qualification equivalent to the unit of competency TLIC2040 (whether that be by completing this unit of competency or demonstrating experience equivalent to this unit of competency). Drivers are assessed by the On-demand Booking Service, and the length of time they have spent in the industry without adverse incidents may be taken into consideration.

DoT Disability Awareness training is available to all staff (synopsis below), however this is not mandatory to complete:

“Disability awareness training provides participants with a general overview of disability. You will hear interesting facts, see myths dispelled and learn a range of tips to support good practice in your workplace. You will be encouraged to think about barriers to your existing recruitment practices. You will also receive advice on how to make small but important changes in the workplace that may support developing confidence and competence when it comes to disability and employment”.

What processes are in place to ensure staff interacting with the public are aware of the needs of people with disability and transport accessibility?

As above.

What processes are in place to make sure staff involved in design, policy and procurement undergo disability awareness or transport accessibility awareness training?

DoT has officers that are subject matter experts in this area, both in policy and regulation and in safety assurance (compliance).

Can you provide any details concerning costs incurred and time taken by staff to undergo current disability awareness training you have in place?

N/A.

If staff disability awareness training was mandatory, would you be required to implement new training programs?

N/A.

What costs would you incur?

N/A.

Are there examples of improved accessibility or improved customer service interactions as a result of recently implemented training programs or well-trained staff?

N/A.

Are there any cases of complaints or other impacts on people with disability that you are aware of relating to staff training?

DoT is not aware of any cases or complaints relating to driver training of WAV drivers.

5. [Mobility Aid Safety](#)

Which option do you prefer: regulatory, non-regulatory or status quo?

Regulatory.

What has been your experience in facilitating travel of mobility devices and carers for people using a device on the network?

Regulation 18 of the *Transport (Road Passenger Services) Regulations 2020* refers to and requires compliance with the current Australian Standards for WAVs covering access to the vehicle, installation standards and occupant restraint systems.

What mobility device restraining systems are used on your public transport conveyances?

N/A.

How have these mobility device restraining systems affected the safe travel of people with disability?

N/A.

What was the cost of these systems?

N/A.

What data do you have on utilisation of restraining systems by people with disability when on-board?

N/A.

What technical barriers or difficulties do you experience in implementing solutions which prevent tipping of mobility devices in both existing and new fleet?

N/A.

What are the barriers, operational costs and other considerations that may arise if staff are required to assist customers in utilising an active restraint system?

N/A.

What alternative mitigations have you implemented to address the risks associated with mobility aids tipping or sliding out of allocated spaces while in transit?

N/A.

Have mobility device users on your public transport conveyances had accidents where the device has slipped or toppled over?

N/A.

What methodologies have been implemented to minimise or reduce the likelihood of further incidents occurring?

N/A.

10. Website Accessibility

Which option do you prefer: regulatory, non-regulatory or status quo? For the regulatory option, do you prefer: sub-option 1, sub-option 2, sub-option 3 or sub-option 4?

Regulatory sub-option 3.

Do your websites with information on public transport services meet website accessibility requirements as prescribed under Web Content Accessibility Guidelines (WCAG) version 2.0 AA?

Bringing DoT's online transaction system 'DoTDirect' in line with WCAG 2.0 AA may present challenges due to potential system changes required – this is less of a concern for the On-demand Transport industry's stakeholders, as online services are not specifically targeted at people with disability (PWD), however the broader public may be affected. A number of areas of the DoT website are currently being remediated to meet requirements.

What are the barriers and challenges with meeting website accessibility requirements?

A barrier to creating fully compliant and appropriate web content is budget – e.g. while video content provides accessibility options (e.g. through providing non-textual information, subtitles for people who are deaf or hard of hearing, audio for people who are blind or with vision impairment/low vision), it is expensive to produce. Resourcing is also a major factor for the Digital Communications and Web Support Teams.

How do the current website accessibility requirements meet the needs of people with disability? What are the barriers to improving accessibility requirements for people with disability?

The DoT website was previously audited by Ernst and Young as part of a DoT audit in late 2019, with the report released in February 2020. The audit covered both WCAG 2.0 as well as compliance against the Western Australian Office of Digital Government's Digital Services Policy. The DoT website was found to be mostly compliant, with issues arising around the use of Microsoft Word documents (as these are sometimes difficult to be parsed by people using screen readers).

How could website accessibility be improved?

For DoT's public-facing website, work is already underway to ensure WCAG 2.0 compliance in our upcoming new website design and format (post-July 2021 launch). Having the required

resources (dedicated Digital Operation's role and implementing mandatory training for anyone who is involved in website publishing) as well as budgeting annually for accessibility would allow for confidence in complying to the most up-to-date version of WCAG.

What are the barriers to improving accessibility requirements for people with disability?

A barrier to creating fully compliant and appropriate web content is budget – e.g. while video content is accessible to PWD (especially intellectual disability), it is expensive to produce. Not having the resources to focus on quality and compliance is another barrier.

What is the nature of feedback you receive from people with disability regarding website content?

Predominant feedback is that people can't find what they're looking for which covers navigation as well as the complexity of how content is presented. Re-writing content and updating navigation is on the 22-25 DoT Digital Roadmap –these issues will be addressed when work on the Roadmap is implemented.

When administering accessible transport schemes (such as the Taxi User Subsidy Scheme (TUSS), student travel subsidies and pensioner free trip scheme), feedback from customers is that the website is difficult to navigate. As mentioned, a project is currently underway to modernise DoT's website. Feedback from people with disability will hopefully improve – this will be monitored as the website is launched.

If the current website does not meet the AA requirements, what upfront and ongoing costs would you incur to meet the requirements?

Current remediation resource requirements for 2.0 AA:

- \$3,000-\$5,000 budget for transcribing service and consultancy
- 25% of a level 5 FTE for coordination over a 3 month project
- 2 x level 6 BIS resources over a 3 months project period.

This work is being done now and is budgeted and resourced.

If your websites were required to meet WCAG 2.1 AA requirements, what upfront and ongoing costs would you incur to meet the requirements?

- \$10,000 per annum transcribing and consultancy.
- 25% of a level 5 FTE for ongoing coordination ongoing.
- 25% of a level 6 FTE ongoing for technical delivery ongoing.

What barriers or operational impracticalities will you face in meeting the requirements?

Resourcing. Having at least two additional roles in the Digital Communications Team and allocated budget would make a considerable difference. Demand for video content grows, as it is not only more engaging but better services the needs of people who speak English and a second language and people with cognitive impairments. Furthermore, the majority of forms on the website are PDF rather than HTML. While DoT has a remit to follow a HTML first approach – delivering it would incur significant additional cost as many forms require workflow and integration with DoT systems.

If your websites were required to meet WCAG 2.0 AAA requirements, what upfront and ongoing costs would you incur to meet the requirements?

In previous consultation with our Digital Communications team, and based on external advice, meeting WCAG 2.0 AAA requirements is impractical. Costs would be around \$350,000 which

would include development, design and content/editorial resources. This is website only and does not include DoT Direct / integration.

What barriers or operational impracticalities will you face in meeting the requirements?

Meeting WCAG 2.0 requirements is challenging for OdT's industry when we create resources and templates for industry – these are often not accessible as they are designed to be printed and completed, not filled out electronically.

11. Communication During Service Disruption

DoT does not have feedback for this section, however, would appreciate being involved during the implementation of reform.

14. Emergency Egress

DoT does not have feedback for this section, however, would appreciate being involved during the implementation of reform.

15. Fit for Purpose Accessways

DoT does not have feedback for this section, however, would appreciate being involved during the implementation of reform.

16. Wayfinding

Which option do you prefer: regulatory, non-regulatory or status quo?

Regulatory.

How successful is the Transport Standards in providing enough information to designers and planners to assist in providing good wayfinding?

N/A.

How can the Transport Standards be improved?

While primarily concerned with wayfinding as it relates to public transport sites, from a 'whole journey' perspective it is important to retain the requirement for all rank or hail vehicles (taxis) to have tactile signage fitted at the passenger entry points.

What do you see are the features of good wayfinding approaches to public transport sites?

N/A.

What feedback have you had from people with disability regarding your current wayfinding provisions?

N/A.

What are the impacts of working with people with disability to develop wayfinding approaches?

N/A.

What are the issues public transport operators and providers face when trying to implement good wayfinding strategies?

N/A.

If the following proposed new requirements are adopted in the Transport Standards, what do you see are the upfront and ongoing costs compared with meeting existing requirements?

- **Braille and tactile requirements as prescribed in in the National Construction Code and Premises Standards;**
- **Specified provisions of Australian Standard AS 1428.4.2 concerning building and room identification; and**
- **Wider use of minimum 30 % luminance contrast requirements as currently required under Transport Standards Section 2.5 Poles and obstacles.**

N/A.

17. Tactile Ground Surface Indicators

DOT does not have feedback for this section, however, would appreciate being involved during the implementation of reform.

18. Passenger Loading Areas

Which option do you prefer: regulatory, non-regulatory or status quo?

Regulatory.

For the regulatory option, which sub-option do you prefer: sub-option 1, sub-option 2 or sub-option 3?

Sub-option 3.

What considerations do you currently make when designing passenger loading facilities?

N/A.

What feedback have you received regarding the use of passenger loading facilities?

Most sporting venues and entertainment hubs have facilities in the immediate proximity to their sites that would meet the requirements outlined in option 3. Challenges arise when the alighting/entering of vehicles is away from these precincts (often at a designated drop-off/pick-up point – either permanent or temporary for that event). This is where the competence of the authorised passenger transport driver is crucial in ensuring the safe access/egress for the passenger.

Flow on effects could be that the passenger is unduly delayed in accessing the event or leaving the precinct post event.

If passenger loading can only be provided on one side of a public transport premises or infrastructure, what is the impact on passengers?

N/A.

In the circumstances where passenger loading can only be provided on one side, what are the reasons why?

N/A.

Bearing in mind the various national, state and local government guidelines on the layout of taxi ranks and passenger loading zones, what is the optimum layout of a taxi rank or passenger loading zone?

Most venues currently consider and provide WAV accessible areas. Mandating the number is outside the scope of DoT but is a major consideration of the venue(s) and the public regular passenger transport provider.

How successful are AS2890.6-2009 and AS2890.5-2020 in providing good templates for the design of accessible taxi ranks and passenger loading bays?

N/A.

How can this be improved?

N/A.

What costs would you see associated with ensuring that the Transport Standards requires all taxi ranks and passenger loading zones at public transport premises and infrastructure to be accessible?

N/A.

19. Provision of Information in Multiple Formats

Which option do you prefer: regulatory, non-regulatory or status quo?

Regulatory approach – with the caveat that if this was extended to online application platforms (i.e. DoTDirect) the costs would be high and DoT would then prefer the non-regulatory option.

What alternative formats of information, other than online formats, do you utilise?

For many information resources DoT provides printed information as well as online formats. Due to the diverse needs of our industry, content is developed with a view to be as simple as possible (easy to understand language, few words and use of images if applicable).

What information do you currently produce in alternative formats that is readily available for a customer on request for content that is available only through digital means?

If requested, we would investigate development of easy read documents, however this is not standard for industry documents as we do not receive requests for these.

What type of requests do you receive from people with disability for alternative formats of information that is provided online that are not readily available?

N/A.

How do you meet these requests?

N/A.

What are the barriers you face in being able to meet these requests?

N/A.

What are the costs associated with providing information in alternative formats when only provided in online content?

Cost would be incurred either in terms of internal staff resourcing, or through the engagement of an external contractor to develop documents in alternative formats.

How do you receive complaints from customers with a disability relating to the provision of information?

Complaints related to provision of information can be submitted through a number of methods, including:

- In-person at a DoT office;
- By mail;
- By email (to On-demand Transport or another area of DoT);

- By phone;
- Via the online general feedback, compliments and complaints form.

How can communication methods with people with disability be improved?

There is an opportunity to strengthen communication, particularly for certain subsidy schemes. Easy read versions (written and electronic) of eligibility, application processes and other participant information could be developed.

20.3 References to Australian Standards Amendments

Do you support the changes to the references to Australian Standards? If not, which changes do you not support and why?

DoT supports updating all references to Australian Standards to the most current Australian Standard to ensure the Transport Standards are up-to-date and accurate. DoT also supports harmonising language with the *Disability Discrimination Act 1992*.

Do you find domed buttons at the end of a staircase to be helpful as a warning indicator?

A domed button signalling a break in, or the end of, a staircase handrail is helpful as a warning indicator and DoT supports its classification as a warning indicator.

Would it be helpful if section 21.2 (Controls – passenger-operated devices for opening and closing doors) and section 21.3 (Controls – location of passenger operated controls for opening and locking doors) in the Transport Standards are consolidated as a single provision?

Bringing provisions 21.2 and 21.3 into a single provision is of no effect to DoT. No further comment.

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4.5 Staff Training and Communication

Which option do you prefer: regulatory, non-regulatory or status quo?

Status quo.

What disability awareness training do you provide to frontline and back of house staff?

All new staff members receive induction training which includes discussion on the PTA's commitment to provide accessible public transport to all passengers.

Front-line staff, including, but not limited to Customer Service Officers, Railcar Drivers, Passenger Ticketing Assistants and Bus Drivers receive additional instruction on meeting the needs of people with disability. The Public Transport Authority of Western Australia (PTA) provides a full day disability awareness training program to Transit Officers, the key frontline workforce.

The training is based on a staff training DVD titled "Disability Awareness Training". The DVD was developed by Transperth's Education Team with input from the disability community and other key stakeholders.

What processes are in place to ensure staff interacting with the public are aware of the needs of people with disability and transport accessibility?

Training and customer service procedures to improve services for people with disability have been developed and implemented. The training was developed in consultation and with the involvement of local disability groups and individuals.

The PTA has developed a *Disability Access and Inclusion Plan* (DAIP) in consultation with key stakeholders that covers all metropolitan and regional services for the period 2017-2022.

One of the strategies listed in the DAIP is to continue to deliver frontline staff training utilising the PTA DVD titled "Disability Awareness Training" available to staff as well as service contractors.

What processes are in place to make sure staff involved in design, policy and procurement undergo disability awareness or transport accessibility awareness training?

In addition to the training that all individuals receive as part of their induction to the PTA, the PTA has two dedicated staff who are trained as Access Consultants. These staff members actively participate in the early stages of project planning and design, they provide advice to new projects on universal design features and on the impacts that may be experienced by users during the construction of new infrastructure.

Project planning also includes liaison with local reference groups, such as the METRONET Accessibility and Inclusion Group, who also provide input and suggestions on the design and useability of proposed stations, station precincts and rollingstock.

The Access Consultants and the local reference group are involved with projects from concept design to construction to operations and support the development of:

- DDA Guidelines for Public Transport Infrastructure; and

- Scope of Works & Technical Criteria - DDA Access Requirements.

Can you provide any details concerning costs incurred and time taken by staff to undergo current disability awareness training you have in place?

No, cost or time metrics are not specifically captured because the training is incorporated into staff training and induction. The training is delivered by in house registered trainers. The only external cost to PTA is to maintain and update the training resources.

If staff disability awareness training was mandatory, would you be required to implement new training programs?

No. The existing training programs are fit for purpose, current and are regularly reviewed to maintain currency.

What costs would you incur?

There would be no additional costs, as the PTA has training for all staff in place and ensures that this training is maintained as current.

Are there examples of improved accessibility or improved customer service interactions as a result of recently implemented training programs or well-trained staff?

Training has been in place for a number of years and the PTA receives commendations from passengers through our 'InfoLine' and other media from time to time, on the high level of customer service provided by front line staff.

Transperth also has a dedicated education team that continues to work closely with local government, community organisations and colleges to provide training on-site and at stations to equip staff and clients with the skills and knowledge necessary to become safe and confident public transport users.

Are there any cases of complaints or other impacts on people with disability that you are aware of relating to staff training?

The PTA is not aware of any complaints or other impacts relating to staff training.

5.4 Mobility Aid Safety

Which option do you prefer: regulatory, non-regulatory or status quo?

Status quo.

What has been your experience in facilitating travel of mobility devices and carers for people using a device on the network?

PTA conveyances are largely accessible and therefore our experience of facilitating travel of mobility devices and carers is good, direct assistance is available where accessibility issues exist. Accessibility of conveyances at train stations, bus stations and bus stops is good and staff are also available to assist at key stations. Seats are available to enable carers to sit with people using standard size mobility devices.

The PTA's Accessibility Policy, accessible via the PTA website, sets out the mobility aid criteria to ensure the safety of wheel chair users, other wheeled mobility aid users and their carers. This includes but is not limited to the size, weight, effective braking systems, stability and manoeuvrability. Unfortunately, there have been times that passengers utilise mobility aids which do not meet the requirements of the criteria set out in the Accessibility Policy, for example, larger gophers. These larger aids are not as manoeuvrable which can lead to delays during boarding/alighting and, potentially, may not always be able to be accommodated within the space available in a conveyance.

Transperth, a division of PTA, has a dedicated education team who have developed an accessibility kit and train the trainer program for disability organisations. The team works closely with key stakeholders including wheelchair suppliers and the community to provide training to equip staff and clients with the skills and knowledge necessary to become safe and confident public transport users.

What mobility device restraining systems are used on your public transport conveyances?

Our regional 'Prospector' and 'Avonlink' trains and road coach fleet operated by Transwa use a system of wheelchair tie down straps which are secured into a floor locking mechanism.

How have these mobility device restraining systems affected the safe travel of people with disability?

On Transwa services, where average journey times are significantly longer than those on the urban rail network, the use of the mobility device restraint systems allows for wheelchairs to be safely fixed to the floor so the passenger need not be moved into a fixed seat for the journey. There is no data available to quantify how the use of mobility device restraining systems has affected the safe travel of people with disability.

What was the cost of these systems?

The cost was included in the purchase price of the conveyance.

What data do you have on utilisation of restraining systems by people with disability when on-board?

Use of the restraint systems is a requirement of travel and they are checked/deployed by PTA staff. As Transwa is a booked service, the booking centre collects data on the number of bookings where the allocated space has been booked, and hence the restraint used.

What technical barriers or difficulties do you experience in implementing solutions which prevent tipping of mobility devices in both existing and new fleet?

Technical barriers exist with the introduction of restraint systems into conveyances that were not structurally designed to accommodate them, there are minimal technical barriers or difficulties when a new conveyance is designed and fitted with mobility device restraining systems, such as ramps or lifts.

Solutions that require on-board staff to operate the restraint present workforce issues.

What are the barriers, operational costs and other considerations that may arise if staff are required to assist customers in utilising an active restraint system?

Delay to operational services while assistance is given to passengers is the main additional operational cost or consideration for journeys undertaken on booked services. Consideration must also be given to providing assistance during the journey when the passenger wishes to utilise other facilities on the service, such as the toilet or the buffet. A means to call staff to assist in the use of the restraint system is required and a staff member may not be immediately available to assist at all times.

There are significant barriers, operational costs and other considerations associated with the use of active restraint systems on Transperth services, including but not limited to:

- Trains and buses do not have on-board staff available to assist at all times (Drivers of PTA conveyances are required to remain in their cab which is behind a security screen);
- Modification costs to incorporate a mandated active restraint system are likely to not be insignificant; and
- Operational impacts will be significant due to the nature of urban, non-booked services and their short dwell times.

What alternative mitigations have you implemented to address the risks associated with mobility aids tipping or sliding out of allocated spaces while in transit?

Allocated spaces for mobility aids are generally bounded by fixed infrastructure such as draught screens or passenger seats which prevent mobility aids from travelling any considerable distance.

Driver training/awareness is delivered to all drivers across the network to ensure that driving technique is cognisant of the carriage of passengers using mobility aids.

The PTA recognises the Companion card and provides free travel for the companion.

The Transperth education team develops training, publications, delivers presentations and demonstrations and works with wheelchair suppliers and disability organisations. The Transperth education team work closely with local government, community organisations and colleges to provide training on-site and at stations to equip staff and clients with the skills and knowledge necessary to become safe and confident public transport users.

Transperth does provide agreed direct assistance where adequate notice is provided. This service has received commendation from passengers. It allows for regular bookings to be

made and for assistance to be provided across all modes and throughout the PTA network to facilitate a whole of journey experience

Have mobility device users on your public transport conveyances had accidents where the device has slipped or toppled over?

Yes. The PTA is aware that there have been instances of mobility devices slipping or toppling on our conveyances. The provision of safety information and training will be of significant importance to reduce the likelihood of further incidents occurring on our network of services.

What methodologies have been implemented to minimise or reduce the likelihood of further incidents occurring?

The PTA recognises the need for safety information and training, and are in the process of coordinating Transperth Accessibility Workshops utilising a purpose built accessible bus stop. This program will allow users access to an out-of-service Transperth bus for a period of approximately 3 hours each month, allowing the user to test their equipment, assess their ability and improve their technique to ensure safe travel is achieved.

6.6 Priority Seating

Which option do you prefer: regulatory, non-regulatory or status quo? For the number of priority seats in the regulatory option, do you prefer: option 1, option 2, option 3 or option 4?

Status Quo or Option 4 (Regulatory).

How many priority seats are provided on your conveyances?

Conveyance	Number of Priority Seats
Transperth Bus	6 per bus
Transperth Train	4 priority seats per railcar (or 24 per 6 car set)
Transperth Ferry	24-26 per ferry

Considering the current requirements for priority seating, what has been your experience in the use and availability of these seats?

The use and availability of priority seats for each conveyance has worked well to date. The provision of priority seats has also been supported by signage to encourage passengers to vacate their seat for those who require the seat. The Transperth Marketing team have also run education campaigns via signage, posters and social media on the correct etiquette for travelling on public transport. The PTA utilises fixed and fold up seats which provides customers with a choice of seats, as well as optimises the use of the area as an allocated space.

What is the impact of providing more than the required number of priority seats (more than 2 per conveyance)?

The number of priority seats provided for each conveyance already exceeds the required number of priority seats and the number provided is considered to be sufficient. The number of priority seats available is reviewed, including during the procurement of new conveyances such as the current procurement of new 'C Series' railcars which will incorporate 24 priority seats per 6 rail car set at, what is considered to be, improved locations and configuration.

If a further increase in priority seats is required, there would be additional costs to update and maintain the identification and signage.

If you have or were to install additional priority seats, what upfront and ongoing costs associated would you incur? How will this impact associated operational issues?

Additional priority seats on conveyances would require additional upfront costs associated with the re-upholstering of seats and installation costs for existing railcars. In addition, there would be other considerations such as the placement of grab rails which may need to move to assist in the use of the priority seats.

With regard to the new railcars, the PTA is actively involved in the METRONET Access and Inclusion Reference Group who have been presented with the design of the new railcars. Feedback was sought from the Group and has been considered in the design of the railcars. The proposed number of priority seats will already exceed the DSAPT requirement.

What challenges would you face if the Transport Standards made it mandatory for upholstery or material (colour/luminance) of priority seats to contrast with regular passenger seating?

What upfront or ongoing costs would you incur?

This initiative is being applied to the new PTA railcar fleet.

For existing conveyances there would be upfront costs associated with changing the upholstery and material of priority seats to contrast with regular passenger seating. The approximate cost of upholstery would be \$200, however additional costs would be associated with the time, resources and costs associated with the design and procurement of the priority seat upholstery.

What benefits would be achieved?

There would be minimal additional benefits achieved because it would not introduce new seats and there is very little difference between priority seats and non-priority seats. The existing signage and labels ensure that priority seats are vacated by able bodied passengers when required.

How do you address circumstances where an individual refuses to vacate a priority seat for a person with a disability?

In a situation where an individual has occupied the priority seat who is not entitled to the seat, he/she has been asked to change seats. Transit Officers, Customer Service Officers and Passenger Ticketing Assistants are readily available to assist passengers in asking able bodied passenger to vacate these seats when required.

7.5 Allocated Spaces in Transit

Which option do you prefer: regulatory, non-regulatory or status quo? For the regulatory option, which sub-option do you prefer: sub-option 1, sub-option 2, sub-option 3 or sub-option 4?

Status quo or Regulation Sub-option 1.

Given the current requirements for allocated spaces what is your experience in the customer use of these facilities?

There have been at times, low usage of the allocated spaces for booked services. The number of allocated spaces provided for each conveyance meets the required number of allocated spaces or exceeds the minimum required by the DSAPT. The number of allocated spaces was reviewed during the procurement of the new PTA railcars and, as a result, the Transperth C series railcars will feature 2 allocated spaces per rail car and other improvements for ease of manoeuvrability. The new regional diesel railcar will feature two fixed allocated spaces and a further four spaces that can be provided by the removal of passenger seats.

Conveyance	Number of Allocated Spaces
Transperth Train	2 per railcar
Transperth Bus	2 per bus
Transwa Coach	2 per coach
Transwa Prospector and Avonlink	2 per railcar
Transperth Ferry	2 per ferry

How would operators and providers be impacted if the Transport Standards made it mandatory for access paths that lead to allocated spaces to be free of obstruction by protruding objects, for allocated spaces to be clustered close to door vestibules or passenger areas and to accommodate larger mobility aids?

The access paths leading to allocated spaces on Transperth conveyances are free of obstruction by protruding objects. In addition, the location of allocated spaces for the new Transperth rail cars will incorporate improved accessibility including the removal of a grab handle in the centre of the vestibule area as an improvement to increase manoeuvrability. Space for larger mobility aids may not be readily available in all existing conveyances, for example road coaches will be limited by the size of the lift as well as the available space in the vehicle. While space may be available, a reduction in passenger seats would be required.

What upfront and ongoing costs would you incur if these changes became mandatory?

Significant upfront costs would be required if larger mobility aids were to be carried.

How do you address circumstances where an individual refuses to vacate an allocated seat for a person with a disability?

In a situation where an individual has occupied the allocated space who is not entitled to the space, he/she has been asked to move along the rail car or bus to an alternative space. Transit Officers, Customer Service Officers and Passenger Ticketing Assistants are readily available to assist passengers.

8.5 Digital Information Screens

The PTA has no comment.

9.5 Lifts

Which option do you prefer: regulatory, non-regulatory or status quo?

Status quo or Regulatory option.

When lifts are installed what are some of the key considerations to determine the most appropriate product?

The key considerations when installing a lift include the type of lift, the floor dimension of the lift, the audible and visual indication, the location of the call button and other infrastructure such as a bollard with call button or motion sensor. Other considerations include features to optimise the reliability of the lift including maintenance program and through-lift design.

Do you have current lift specifications or standard designs?

Yes, the PTA has developed a lift specification document which is utilised for all projects.

Which standard do you currently comply with?

AS1735, NCC, EN 81-20 and EN 81-50 (European Standard) which covers the safety rules for the construction and installation of lifts. There is a mandatory requirement in the specification to ensure that where there is a discrepancy, the more stringent requirement shall apply. According to the PTA's Lift Specification, the minimum size for lift car dimensions is 1500mm width x 2100mm depth excluding the door recess. This ensures that the lift is stretcher compliant.

What are the impacts of harmonising the Transport Standards lift requirements with those of the NCC/Premises Standards?

The PTA Lift Specification considers the various requirements of the above standards. The harmonisation will align the lift specifications and will be beneficial in providing certainty on the requirements.

If the Transport Standards lift requirements are updated to align with NCC/Premises Standards requirements, what upfront and ongoing extra costs are likely to be incurred to meet these new requirements?

According to the PTA's Lift Specification, the minimum size for lift car dimensions is 1500mm width x 2100mm depth excluding door recess. This ensures that the lift is stretcher compliant. The current DSAPT requires lifts to comply with the dimensions set out in AS 1735.12 which is 1100mm in width and 1400mm in depth, where the NCC and Premises Standards require at least 2000mm in width and 1400mm in depth.

As such, there would be no upfront and ongoing extra costs to be incurred with new requirements.

If lifts are required to be updated to align with NCC/Premises Standards, how long will a lift be out of service?

N/A.

Do contractual lift maintenance and repair timeframes stress the fastest possible return to service?

Yes, however there are other factors such as the time taken for lift outage to be reported in the first place, the amount of time required to obtain any spare parts and equipment to undertake any repairs.

How can down times for lift maintenance and repairs be made equivalent in metropolitan and regional areas? N/A

There are no lifts at Transwa facilities (regional) in WA.

What is the average response time for breakdown or entrapment in regional areas?

There are no lifts at Transwa facilities (regional) in WA.

10.6 Website Accessibility

Which option do you prefer: regulatory, non-regulatory or status quo? For the regulatory option, do you prefer: sub-option 1, sub-option 2, sub-option 3 or sub-option 4?

Regulatory – Sub option 1.

Do your websites with information on public transport services meet website accessibility requirements as prescribed under Web Content Accessibility Guidelines (WCAG) version 2.0 AA? What are the barriers and challenges with meeting website accessibility requirements?

Not all of the PTA's websites currently meet the website accessibility requirements as prescribed under Web Content Accessibility Guidelines (WCAG) version 2.0 AA. Time and resources are the barriers when meeting website accessibility requirements. In addition, there are also challenges in meeting compliance for certain areas such as the Transperth Journey planner where a large volume of information is required for its functionality. Meeting compliance in these circumstances would result in a reduced level of information being available to passengers in effectively planning their journey.

How do the current website accessibility requirements meet the needs of people with disability? What are the barriers to improving accessibility requirements for people with disability?

As part of upgrade or changes to the website design, the PTA request that the new pages/areas are designed to be WCAG 2.0 AA compliant. The PTA also monitors its content as it is created to comply with those standards.

There are ongoing challenges in meeting compliance for certain areas such as the Transperth Journey planner where a large volume of information is required for its functionality. The PTA continues to maximise its compliance with WCAG 2.0 AA without compromising the volume of information required for passengers to plan their journey.

How could website accessibility be improved?

Our websites could be improved by compliance with WCAG 2.0 AA, and where compliance is not achievable, then the website should comply to the maximum extent possible.

What is the nature of feedback you receive from people with disability regarding website content?

N/A.

If the current website does not meet the AA requirements, what upfront and ongoing costs would you incur to meet the requirements?

There would be significant upfront costs in meeting requirements, however we are unable to determine the cost until the scope of works is developed.

If your websites were required to meet WCAG 2.1 AA requirements, what upfront and ongoing costs would you incur to meet the requirements?

There would be significant upfront costs in meeting requirements, however we are unable to determine the cost until the scope of works is developed. It is anticipated that the costs would be significantly higher than meeting 2.0 AA requirements.

What barriers or operational impracticalities will you face in meeting the requirements?

There would be significant time and resource implication.

If your websites were required to meet WCAG 2.0 AAA requirements, what upfront and ongoing costs would you incur to meet the requirements?

There would be significant upfront costs in meeting requirements, however we are unable to determine the cost until the scope of works is developed. It is anticipated that the costs would be significantly higher than meeting WCAG 2.0 AA requirements.

What barriers or operational impracticalities will you face in meeting the requirements?

There would be significant time and resource implication.

11.5 Communication during Service Disruption

The PTA has no comment.

12.5 Gangways

Which option do you prefer: regulatory, non-regulatory or status quo?

Regulatory.

How successful is the Transport Standards in providing clarity on technical and functional requirements for accessibility of gangways connecting to ferry pontoons?

The current Transport Standards is sufficiently clear in its requirements for accessibility of gangways connecting to ferry pontoons.

How could the Transport Standards be improved to reflect best practice?

N/A.

What are the potential upfront or ongoing costs associated with providing clarity on technical requirements to reflect best practice?

N/A.

What are the core differences between a fixed ramp and a gangway from a design and use perspective?

A gangway allows the conveyance to be accessed during a wide range tidal levels but has the disadvantage that the ramp is not easily maintained at low gradients for users. PTA undertook a recent upgrade of Mends Street Jetty which cost \$2.2 Million.

13.5 Assistance Animal Toileting Facilities

Which option do you prefer: regulatory, non-regulatory or status quo?

Status Quo or Non-regulatory.

What considerations do you currently make for people traveling with an assistance animal on public transport?

The PTA allows for approved assistance animals to travel on public transport. The PTA Accessibility Policy has provisions for assistance animals to ensure the safety and comfort of the travelling public as well as PTA employees. The design of priority seats allows for ample leg clearance for the assistance dog.

What (if any) assistance animal toileting areas have you constructed on your public transport network or facilities?

To date, there are no designated assistance animals toileting areas constructed on the public transport network or facilities. The major interchanges and stopover locations on the public transport network are surrounded by ample open space.

What designs did you consider and what were the deciding factors that led you to your final design?

N/A.

What features are available to users within or immediately outside the area?

N/A.

What materials did you use for the construction of the area/s? To what extent did the locations/environments where the area/s were constructed determine the type of materials used?

N/A.

What was the cost (or foreseeable cost) to construct the area/s?

N/A.

What is the cost (or foreseeable cost) to maintain and clean the area/s?

N/A.

14.5 Emergency Egress

Which option do you prefer: regulatory, non-regulatory or status quo?

Non-regulatory.

How can emergency egress be accommodated through the use of the existing provisions of access paths?

In the majority of situations, there will be an accessible egress route that leads the public away from the transport infrastructure. However, there are situations where it is more challenging such as on the train platform.

Access paths from conveyances present significant challenges when an incident occurs which prevents the conveyance from reaching a safe embarkation point, i.e. platform.

How do you currently accommodate and design for emergency situations at public transport sites (trams and bus stops), for example signage with emergency egress options?

The PTA's Emergency Management Manual has provision on the evacuation process across the network for all modes of public transport.

Where bus stops are located at a bus port or major interchange, there are emergency evacuation signals, both visual and audible alarms for safety where installed.

What are your policies and procedures in place for emergency situations?

The PTA has developed an Accessibility Policy and Specification – Accessibility and Mobility Requirements for New and Upgraded Stations and Buildings. The PTA's Emergency Management Manual also provides details on the procedures in the event of an emergency.

How do you manage emergency evacuation incidents at your public transport infrastructure sites?

Emergency evacuations on the urban rail network are supported by Transit Officers who are dispatched to the scene of incidents.

The PTA's Emergency Management Manual provides details on the procedures in the event of an emergency and PTA runs emergency evacuation drills periodically, lessons learnt are feedback into the evacuation procedures. The PTA has dedicated staff who manage and investigate emergency evacuation incidents.

The procedures cover the evacuation of passengers with a disability. This includes direct assistance where lifts are required to not be in use. For example, a coach driver may assist to carry a passenger where practical with assistance from other passengers. Announcements to consider passengers with a hearing and/or vision impairment.

The procedures also include requirements for passengers who are unable to evacuate from platforms via the stairs to be directed to refuge areas, until the Chief Warden confirms it is safe to use the lifts for evacuation.

What lessons can be learnt from these experiences?

Depending on the circumstances of the emergency, there are times a passenger using a wheelchair or similar wheeled mobility device is not able to be evacuated away from the public transport infrastructure, and has to remain in the refuge area until they are directly assisted to evacuate the premises.

What are the complexities and additional costs in being able to provide emergency egress at public transport sites which are not covered by the Premises Standards?

There are additional costs in providing emergency egress to design and construct infrastructure where a passenger is not required to use a refuge area. For example, providing rail platforms with ramps at each end of the platform leading to the carpark via the perway. Other considerations such as allowing lifts to be utilised in the event of an emergency would incur minimal costs. Additional training would also be required which may have financial implications and time factors for staff.

There are complexities in the provision of ramps at the end of rail platforms, as often it leads to the rail perway and a steep embankment.

15.5 Fit for Purpose Accessways

Which option do you prefer: regulatory, non-regulatory or status quo?

Status quo.

Where stairs and ramps are co-located, what have been the observed customer behaviour or feedback that has been received about their functionality?

Where stairs and ramps have been co-located, there are situations where passengers congregate near the top of stairs or ramps. At the same time, the co-location of stairs and ramps facilitates a person with vision impairment to make a decision on their path of travel.

How are access ways at public transport sites designed to ensure direct / straight navigation that is safe and provides timely egress of passengers at all times ('fit for purpose')? At what point do you decide to provide both stairs and ramps when designing transport infrastructure?

The PTA is actively involved in the Metronet Access and Inclusion Reference Group. As part of its role, consultation with subject matter experts occurs throughout various stages of the design of the public transport infrastructure and conveyance. This allows for the location of stairs and ramps to be considered, to ensure it facilitates a person who has a disability (such as vision impairment) to make decisions on their path of travel.

Ramps are provided where there is adequate space and the required gradients can be achieved. Otherwise, lifts and stairs are provided to ensure adequate access.

16.5 Wayfinding

The PTA has no comment.

17.5 Tactile Ground Surface Indicators

The PTA has no comment.

18.5 Passenger Loading Areas

The PTA has no comment.

19.5 Provision of Information in Multiple Formats

The PTA has no comment.

20.3 References to Australian Standards Amendments

Do you support the changes to the references to Australian Standards? If not, which changes do you not support and why?

Yes, we are supportive of changes to the references to Australian Standards to remove the year to maintain the currency of the DSAPT. However, it would be a further improvement to remove references to the Australian Standards and have the requirements included in DSAPT. Currently the DSAPT is available online at no costs, however it is difficult to access Australian Standards without additional steps and incurring additional costs.

Do you find domed buttons at the end of a staircase to be helpful as a warning indicator?

Yes, the PTA has included a requirement for dome buttons at the end of a staircase and ramp as a warning indicator. It alerts the person that they are near the end of the ramp/stairs. To date, the consultation of the vision impaired community has supported the installation of dome buttons.

Would it be helpful if section 21.2 (Controls – passenger-operated devices for opening and closing doors) and section 21.3 (Controls – location of passenger operated controls for opening and locking doors) in the Transport Standards are consolidated as a single provision?

It would be beneficial to operators to consolidated provisions to simplify and facilitate compliance.