



COMMUNIQUE FOR THE NATIONAL ACCESSIBLE TRANSPORT STEERING COMMITTEE

Monday 13 October 2025

On 13 October 2025, the National Accessible Transport Steering Committee (the Steering Committee) considered the non-mandatory Transport Standards compliance reporting framework developed by the reporting working group. The purpose of the framework is to provide clear and consistent guidelines to assist operators and providers to develop and improve their data collection and reporting processes, outlining their compliance with the Disability Standards for Accessible Public Transport 2002 (Transport Standards).

The Steering Committee endorsed the framework and agreed the framework presents a balanced and positive step forward. Steering Committee members also discussed a number of residual concerns that may impact operators and providers ability to fully implement the guidance outlined in the framework. Members noted:

- The potential risks associated with reporting instances of non-compliance.
- Concerns regarding potential unintended consequences associated with how operators and providers prioritise addressing non-compliances.
- Compliance auditing processes may be costly and reporting processes will take time to mature.
- The provision of information about the functional accessibility of public transport services is pivotal to supporting independent travel for people with disability.
- Data produced by each operator and provider will not be directly comparable, as the framework does not prescribe a common auditing and reporting methodology.
- Reporting should be presented in a format that is meaningful and demonstrates the tangible impact of non-compliances for people with disability.

The framework recognises the challenges raised by Steering Committee members, and provides flexibility to operators and providers to manage risk and resourcing to improve the completeness of their compliance reporting as data availability and quality increases over time. The Steering Committee recognised the framework will require further refinement as auditing and reporting processes mature, including the development of supporting tools such as templates and detailed guidance.

All operators and providers are encouraged to consider the guidance in the framework and undertake work to begin reporting on their compliance with the Transport Standards. Implementing the framework will assist all levels of government in fulfilling their commitments under the United Nations Convention on the Rights of Persons with Disabilities and their commitment to report on percentage compliance with the Transport Standards, as agreed by First Ministers under Australia's Disability Strategy 2021-2031.

The Australian Government will continue to work with all stakeholders to share and progress initiatives that support the continuous improvement of auditing and reporting processes. An evaluation of the efficacy of the framework and an assessment of the progress of operators and providers implementing the framework will be undertaken through the next statutory review of the Transport Standards in 2027.

Further information is available on the Australian Government [Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts' website](#).



Compliance Reporting Framework

Disability Standards for Accessible Public Transport 2002

October 2025

Contents

Objective	2
Guidance to support operators and providers to develop and publish compliance reports	4
Responsibility	4
How to report on compliance	5
Auditing	8
Reporting timeframes and publication formats	10
Further information	11
Appendix A – Definitions and terminology used in this framework	12
Appendix B – Further information about related reforms to the Transport Standards and other government obligations and initiatives	14
Appendix C – Further guidance: checklists and templates	16

Objective

Purpose

The framework provides guidance for operators and providers of public transport to consider when publishing reports outlining their compliance with the Disability Standards for Accessible Public Transport 2002 (Transport Standards). The framework sets expectations to increase the transparency and accountability of operators and providers compliance with the Transport Standards, while highlighting the need for continuous improvement in reporting practices. This approach recognises the challenges developing and implementing auditing and reporting processes, and provides flexibility to operators and providers to improve the completeness of their compliance reporting as data availability and quality increases over time.

Providing compliance information to the public demonstrates operators and providers' progress and commitment to meeting their obligations under the Transport Standards. This is particularly relevant for operators and providers that have not met compliance target dates as set in the Transport Standards. Currently, no operators and providers publish compliance information publicly. This information will support the disability community and disability representative organisations to prioritise advocacy work, and provide valuable insights to inform future statutory reviews of the Transport Standards. The framework also assists all levels of government in meeting their commitments under *Australia's Disability Strategy 2021-2031 (ADS)* and the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). Data generated through compliance reporting may also be incorporated in Disability Action Plans of operators and providers, as outlined in Part 3 of the *Disability Discrimination Act 1992 (DDA)*.

The framework was developed by a working group consisting of representatives from:

- Airlines for Australia and New Zealand
- Attorney-General's Department (Commonwealth)
- Australian Airports Association
- Australian Federation of Disability Organisations
- Australian Human Rights Commission
- Bus Industry Confederation
- Department for Infrastructure and Transport (South Australia)
- Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (Commonwealth)
- Department of Social Services (Commonwealth)
- Department of Transport and Main Roads (Queensland)
- Department of Transport and Planning (Victoria)
- Guide Dogs Australia
- Guide Dogs NSW/ACT
- Justice and Equity Centre
- Metro Trains
- National Ethnic Disability Alliance
- People with Disability Australia
- Physical Disability Council of NSW
- Transport Canberra and City Services
- Transport for New South Wales
- V/Line
- Yarra Trams

A list of organisations that have committed to implementing this framework will be published on the [Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts' website](#).

A glossary of key terms used in the framework is at Appendix A.

Further information about related reforms to the Transport Standards that will improve information provision and other related government obligations and initiatives is at Appendix B.

Approach

All operators and providers are encouraged to use the framework when developing compliance auditing methodologies and reports. Operators and providers are expected to report their compliance with

requirements in accordance with the implementation arrangements under the Transport Standards. The Transport Standards require all assets to be fully compliant with current requirements by 31 December 2022, except trains and trams, which must comply by 31 December 2032. Operators and providers are also expected to report their compliance with any future requirements, once the implementation arrangements for those requirements are triggered through legislation. Further information is provided in the 'Reporting compliance with the amended Transport Standards' section of the framework.

Collecting and collating compliance data in a format suitable for reporting is complex, and the scale of services and levels of maturity in data collection processes vary between operators and providers. The framework therefore adopts a performance-based approach that outlines guidance to be adopted in compliance reporting. As the framework does not prescribe a common auditing methodology, for transparency, operators and providers should clearly outline their approach to developing and collating compliance data. Where appropriate, state and territory governments are encouraged to consider providing their contracted service providers with an auditing methodology to assist with data collection and collation. When reviewing information contained in a report, readers should note the approach detailed by the operator or provider. This information should also be considered if a reader is comparing data contained in reports developed by different operators and providers.

Additional supporting guidance will be developed by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts to assist operators and providers to develop and publish compliance reports. This may include auditing checklists and reporting templates. Further information is provided at Appendix C.

Summary of expectations

Noting the varying levels of maturity in auditing and compliance reporting across operators and providers, the guidance outlined in the framework is intended to support a transparent and iterative approach that facilitates increases in data availability and quality over time. Below is a summary of the expectations that operators and providers should seek to work towards when implementing compliance reporting processes. These expectations are discussed in detail throughout the framework.

- **Responsibility** – Public transport operators and providers are responsible for implementing the framework. This includes private operators and providers, local governments, and state and territory governments.
- **Comprehensive compliance reporting** – Compliance reports should be representative of all requirements of the Transport Standards that apply to all assets or services that are within the responsibility or control of the operator or provider.
- **Transparency** – For transparency, operators and providers should clearly outline their approach to developing and collating compliance data. Compliance reports should clearly outline which assets and services are captured in reporting, the auditing methodology used, and how the data has been collated for presentation in the report.
- **Auditing** – Compliance should be audited during the design, construction, maintenance and upgrade of assets. It is to re-audit assets at regular maintenance intervals of at least every five years to confirm ongoing compliance.
- **Iterative improvements** – Operators and providers are expected to increase data availability, quality and completeness in each successive compliance report.
- **Pathway towards comprehensive reporting** – Given the development of data collection and collation methodologies in a format suitable for publication may take time to develop, operators and providers should be as transparent as possible in outlining their forward work program of auditing and reporting activities (including timeframes for re-auditing and anticipated timeframes for the provision of complete data).
- **Publication in accessible formats** – Compliance reports should be publicly available in an accessible format, as outlined in the 'Reporting timeframes and publication formats' section of this framework.

- **Timeframes** – Operators and providers should seek to prepare their first compliance report by the end of 2026, to coincide with the 2027 review of the Transport Standards. They then should seek to publish annual progress updates thereafter incorporating any new data.
- **Engaging with disability representative organisations** – Operators and providers should provide pathways through which disability representative organisations can ask questions about their compliance reports.

Evaluation

An evaluation of the effectiveness of the framework will be assessed through the next statutory review of the Transport Standards, scheduled to commence in 2027. Noting it will take time for data collection and reporting processes to mature, the evaluation may include an assessment of the processes that have been implemented by operators and providers to improve reporting capability, rather than a strict focus on the quality and quantity of data produced. For example, the evaluation may consider:

- What processes have been implemented by operators and providers to improve their data collection and reporting capability.
- An assessment of the uptake of compliance reporting by operators and providers in accordance with the framework.
- Whether reporting is meeting the objectives of the framework. For example, whether reporting is increasing transparency and accountability by providing clear and accessible information about how operators and providers are meeting their obligations under the Transport Standards, and whether reporting is assisting disability representative organisations in their advocacy work.
- Whether the reporting process is meeting the needs of all stakeholders, including people with disability, operators and providers, and government.
- Whether the reporting process allows for data to be accurately reported at specific points in time, compared with data previously published by that operator or provider, and presented in a useful and accessible format. This includes whether supporting information is provided to explain how data availability will increase over time and whether the information is easily understood.
- Whether there are aspects of the framework that require refinement or further guidance, including reporting and re-auditing timeframes.

Pending the outcomes of this assessment, consideration may be given to revising the framework or whether compliance reporting should be mandated through amendments to the Transport Standards. The development of any future legislative amendments would be subject to the [Australian Government's Guide to Policy Impact Analysis](#) and further consultation.

Guidance to support operators and providers to develop and publish compliance reports

Responsibility

Operators and providers are responsible for auditing and reporting on the compliance of their assets and services. This includes private operators and providers, local governments, and state and territory governments.

Some operators and providers, such as local governments and state and territory governments, contract a range of service providers to provide public transport within their jurisdiction. It is the responsibility of state and territory governments to encourage contracted operators and providers to adopt the framework and to include compliance reporting requirements in contracts. If an operator or provider collates data from contracted service providers to provide a consolidated overview of compliance, their report should clearly outline which services are captured in reporting and the process through which data has been

aggregated. If the state or territory government transport agency chooses to consolidate data, the underlying data from each contracted operator and provider should also be published as an annexure to the compliance report or be available on request. It is the responsibility of state and territory governments to determine whether they will collate data from contracted service providers, or whether each operator and provider will publish compliance reports separately. If a state or territory government decides to consolidate data, they should ensure quality assurance processes are undertaken to ensure data remains accurate. State and territory governments are responsible for managing risks or complexities that may arise due to the collation of data.

In some instances, multiple operators and providers are responsible for the provision of assets across a public transport network. For example, bus stop infrastructure on a route may be the responsibility of local governments as it falls on local government land, with some components such as signage poles the responsibility of the state government. In instances such as this, it is important that operators and providers with joint responsibility seek to maintain a consistent understanding of their approach and actively engage with other responsible entities to delineate responsibilities and determine appropriate auditing methodologies and data collection processes.

How to report on compliance

How to comply with the Transport Standards

As outlined in section 33.3 of the Transport Standards, compliance with the Transport Standards may be achieved by:

- applying relevant specifications in the Transport Standards; or
- using methods, equipment and facilities that provide alternative means of access to the public transport service concerned (but not using separate or parallel services) with equivalence of amenity, availability, comfort, convenience, dignity, price and safety (refer also to definition of *equivalent access*). This may include direct assistance over and above that required simply to overcome discrimination.

Section 33.7 of the Transport Standards provides that it is not unlawful to fail to comply with a requirement of the Transport Standards if, and to the extent that, compliance would impose *unjustifiable hardship* on any person or organisation. Further information is provided at Appendix A.

Elements to be reported on

Operators and providers should report on the compliance of all their assets or services and provide data representative of all requirements in the Transport Standards that apply to their assets or services. An operator or provider should report on the assets they own and/or services they provide, within their boundary of ownership, control or responsibility. For transparency, operators and providers should outline which requirements are captured in reporting and how assets and services have been audited. If an operator or provider does not report the compliance of all their assets or services with all requirements in the Transport Standards, this should be clearly noted and accompanied by explanatory text.

Expectations to increase data availability over time

The framework recognises that increasing data availability and quality will take time and may require additional resources and upskilling of staff to develop data collection and reporting processes. In recognition of this, operators and providers may initially report at a standard below which can be improved in the future, by either building data availability over time and/or using representative sampling to stagger the development of complete and comprehensive reporting. However, the use of these approaches should be clearly outlined and operators and providers are expected to increase data availability, quality and completeness in each successive report.

It is the responsibility of operators and providers to progressively improve the collection of data and public reporting on compliance with the Transport Standards.

Building data and reporting capability

Whilst operators and providers are building their reporting capability, they may choose to initially report data for a selected group of assets, and build a more complete data set over time. If an operator or provider adopts this approach, data provided should represent the selected assets' compliance with all requirements in the Transport Standards that apply to that asset. This approach may assist operators and providers with managing their resources, while building data availability iteratively.

Example

A provider of light rail infrastructure may choose to audit and report the compliance of 25 per cent of their light rail stops in a given report. In the next update of their report, the provider would incorporate compliance data for a further 25 per cent of their light rail stops, and any new data on the group of light rail stops that were reported on in the previous report. In this example, the second report would therefore contain data for 50 per cent of their assets. Using this approach, the provider will work towards building a complete dataset outlining the compliance of 100 percent of their assets.

If an operator or provider chooses to build data availability through the process outlined above, to ensure transparency and data availability increases over time, operators and providers should clearly outline how they will use partial reporting to stagger increases in data. This should include detailed information about which assets are captured in reporting, why those assets were selected, which requirements of the Transport Standards were audited and their forward work program of auditing and reporting activities to ensure additional assets are captured in each successive compliance report. For transparency, operators and providers should indicate when they expect to provide compliance data for all their assets. If possible, operators and providers should also state if they expect future data to show higher, similar, or lower levels of compliance to the assets already audited. In some circumstances, it may be necessary for operators and providers to caveat this information noting that forward work programs are indicative and subject to change.

Representative sampling and extrapolation to gather data for conveyances and standardised products

If an operator or provider procures or operates a fleet of conveyances, they may choose to use representative sampling and extrapolation to estimate the overall compliance of that fleet of assets. For example, an operator of bus services may choose to audit a bus to assess the compliance of the asset, and then extrapolate this data to present an estimated overview of all identical assets in a fleet procured through the same process. Similarly, it may be appropriate to use extrapolation for the assessment of standardised products in networks, such as the design of a ticket machine or bench seat. However, it is important the spatial arrangement for these items is considered on a site by site basis. For example, whether there is sufficient circulation space in front of a ticket machine deployed at a train station. If this approach is used, the process through which data is developed should be clearly explained.

The use of representative sampling is not appropriate for whole infrastructure or premises, such as an entire train station.

If an operator or provider chooses to use representative sampling and extrapolation, operators and providers should outline the fleet of assets' compliance with all requirements in the Transport Standards that apply to that asset. Likewise, operators and providers are expected to include thorough explanatory information with details of how data has been captured, consolidated, estimated and presented. As auditing processes mature, operators and providers should increase the number of assets audited used to inform extrapolation.

If routine quality assurance and maintenance checks are not conducted, the long-term use of sampling and extrapolation may not provide a clear and complete assessment of the compliance with the Transport Standards. This is due to the natural wear and tear borne by assets over time, which may impact the ongoing compliance of the asset. If these checks and inspections are not undertaken and operators and providers rely on extrapolated data, there is a risk that the degradation of an asset's compliance may go unnoticed and/or unreported on.

Reporting compliance with the amended Transport Standards

The Transport Standards require all assets to be fully compliant by 31 December 2022, except trains and trams, which must comply by 31 December 2032. As such, operators and providers are expected to report their compliance with these requirements in their compliance reports.

When the amendments to the Transport Standards announced in March 2024 take effect, a range of new requirements will be introduced, meaning operators and providers will have additional compliance obligations. Further information about these compliance obligations will be outlined in an amended version of the Transport Standards that will be published on www.legislation.gov.au once the amendments take effect.

The amended Transport Standards will set one of the following implementation options for each new requirement:

- **New or substantially upgraded assets** – new requirements will apply to all new assets, and will only apply to assets that are currently in service if the asset is substantially upgraded.
- **Existing assets with a compliance schedule** – new requirements will apply to all new assets, and will apply to all assets that are currently in service, in accordance with timeframes to be prescribed in the amended Transport Standards.
- **On commencement** – new requirements will apply from the date the amendments to the Transport Standards come into effect.

Operators and providers must comply with the new requirements in accordance with the relevant implementation approach for each reform and report the compliance of their assets accordingly. Examples are provided below.

Example – amendments that apply to new or substantially upgraded assets only

The amended Transport Standards will introduce new requirements for access paths, manoeuvring areas and allocated spaces to be co-located within conveyances. Operators and providers must comply with these requirements for all new or substantially refurbished conveyances brought into service on or from the date the amended Transport Standards come into effect. Conveyances brought into service before the amended Transport Standards do not need to comply with these requirements.

Operators and providers should report on their compliance with the requirement to co-locate access paths, manoeuvring areas and allocated spaces for new or substantially refurbished conveyances brought into service after the amended Transport Standards take effect.

Example – amendments that apply to existing assets with a compliance schedule

The amended Transport Standards will introduce new requirements for the provision of accessible taxi ranks. Operators and providers will be required to comply with this requirement 10 years from the date the amended Transport Standards take effect. Prior to the 10-year compliance timeframe date, providers of taxi rank infrastructure are encouraged to publish in their reports information about their progress towards complying with this new requirement, but they will not be required to assess their compliance until the compliance date. Once the compliance date has passed, providers should outline their compliance with the requirement in each subsequent report.

Example – amendments that apply on commencement

The amended Transport Standards will introduce a performance-based requirement for lighting. Operators and providers must comply with the requirement from the date the amended Transport Standards come into effect and should report on compliance with this requirement in reports after the amended Transport Standards take effect.

Consideration of assets covered by the Premises Standards

A large proportion of public transport premises and buildings are also covered by the [Disability \(Access to Premises – Buildings\) Standards 2010](#) (Premises Standards). Generally speaking, the Transport Standards only apply to ‘non-building’ elements in passenger-use areas of buildings used for the delivery of public transport, such as boarding points at railway platforms. Requirements for public transport building elements such as accessways, toilets and lifts are included in Part H2 of the Premises Standards (and [Part 12 of the National Construction Code 2022](#)).

Noting the linkages between the Transport Standards and Premises Standards in creating accessible public transport premises, operators and provider should consider reporting their compliance with both sets of standards in their reports. While compliance with the Premises Standards goes beyond the remit of the framework, operators and providers are encouraged to include elements under Part H2 to ensure reporting is holistic and representative of the overall compliance of a premises with relevant accessibility requirements.

Highlighting other initiatives and information

Operators and providers may also use compliance reporting as an opportunity to highlight other initiatives underway in relation to the Transport Standards and public transport accessibility. For example, information on accessibility action plans, the progress of implementing other initiatives or examples of co-design processes, innovative technologies being implemented to increase accessibility, or analysis of complaints data.

Auditing

Operators and providers are responsible for determining the auditing methodology to be used to develop their compliance reports. In recognition of the various auditing methodologies deployed across Australia, the framework does not prescribe how auditing should be undertaken. For transparency, the auditing methodology used by an operator or provider should be outlined in reporting. Operators and providers seeking further information on auditing and reporting processes are encouraged to consider the additional guidance that will be developed and provided at Appendix C.

Compliance auditing may be undertaken by internal or external auditors, including accredited access consultants or appropriately qualified staff.

Operators and providers are also encouraged to investigate novel auditing methods and emerging technology to improve auditing efficiencies. For example, operators and providers could consider using artificial intelligence and other systems to assist in collecting data, provided there is appropriate verification of such data to ensure it remains accurate.

Incorporating auditing into contracts

Across the lifespan of an asset, there are several stages where it is appropriate to conduct an audit. This includes during the design or procurement of an asset, on completion of the construction of a new asset, after a significant upgrade or retrofitting activity, when the infrastructure or conveyance that it interfaces with undergoes changes, and periodically to ensure ongoing compliance later in an asset’s lifespan.

Operators and providers should incorporate auditing requirements into contracts with suppliers during the design, construction or maintenance of assets. In some circumstances, this may require variations to existing contracts, which may incur costs or delays to the implementation of reporting. Operators and providers are responsible for managing this process and communicating any delays to implementation through clear explanatory text in their reporting.

To ensure auditing is completed accurately, contractual requirements to undertake compliance auditing should be complemented by quality standards. For example, operators and providers should consider requiring the auditor to meet assurance requirements or be an accredited access consultant, and that data be provided in a format suitable for inclusion in the operator or provider's database. Training and the provision of guidance material may also assist with ensuring auditing is undertaken accurately and data is provided in a useful format.

Routine auditing to ensure compliance over time

Compliance data represents the point in time at which the audit was undertaken. Over time, this data may become misrepresentative of the compliance of an asset. For example, in some instances, nearby construction may impact an accessway, or the luminance contrast of tactile ground surface indicators may deteriorate due to wear and tear or vandalism.

Operators and providers should undertake routine inspections to re-audit assets, aligned with their regular maintenance and upgrade programs for each asset. If an asset does not have a regular maintenance schedule, operators and providers should re-audit assets on notification of complaints from users, and at least every five-years to confirm compliance with the Transport Standards. If the asset is found to be non-compliant through this process, the operator or provider should undertake remediation works to ensure the asset's compliance is restored. Any changes in compliance status should be reflected in subsequent compliance reports. For transparency, operators and providers should outline the expected timeframes for re-auditing in their reports.

Separate to compliance auditing – it is important operators and providers regularly engage with people with disability to ensure their assets and services remain accessible and safe.

Capturing equivalent access

Equivalent access is a recognised form of compliance in the Transport Standards. Equivalent access is a process whereby an operator or provider is allowed to vary the equipment or facilities that give access to a public transport service, so long as an equivalent standard of amenity, availability, comfort, convenience, dignity, price and safety is maintained. This does not include a segregated or parallel service. Providing equivalent access solutions can also support people with disability to undertake independent travel and increase agency.

It is important when auditing assets, operators and providers work towards capturing in reporting instances where equivalent access is used as a means of compliance. If an operator or provider reports compliance through equivalent access, they should consider whether they are meeting their obligations under the Transport Standards for each relevant asset. The Australian Human Rights Commission (AHRC) has produced guidelines to provide clear and practical assistance to facilitate compliance with the Transport Standards using equivalent access. The Guidelines are available on the AHRC's website at <https://humanrights.gov.au/our-work/disability-rights/publications/access-under-disability-standards-accessible-public>.

For transparency and accountability, operators and providers should ensure their reports clearly outline which assets an equivalent access process applies to and how equivalent access has been used. Operators and providers should also provide information about the consultation processes undertaken to support the use of equivalent access. This may include an overview of the impacted assets, who was consulted, what feedback was received, and how the solution delivers an equivalent standard of amenity, availability, comfort, convenience, dignity, price and safety. If direct assistance is used to provide equivalent access,

information should also be provided about the measures taken to ensure assistance is provided when needed and to a high standard.

The provision of this information also allows operators and providers to demonstrate how they are meeting the needs of people with disability, and explain why full compliance with the relevant specifications in the Transport Standards is either unfeasible or does not lead to the best outcome for users. In some instances, an asset may be non-compliant with the Transport Standards but remain functionally accessible. Likewise, there may be instances where prescriptive compliance does not achieve a functional outcome, and an equivalent access solution is used to provide a better outcome for users.

In recognition of the potential scale of assets where equivalent access is used, operators and providers may consider providing information in their report that demonstrates how an applicable level of accessibility has been provided across a class of similar assets – rather than on a case-by-case basis. If this is done, the process taken should be clearly outlined.

Unjustifiable hardship and temporary exemptions

Operators and providers should work towards capturing in reporting instances where they consider that compliance would impose unjustifiable hardship and outline steps they have taken to maximise the accessibility of assets and the services for people with disability. Likewise, reporting should highlight any instances where the AHRC has granted a temporary exemption under the DDA. Further information about unjustifiable hardship is provide at Appendix B.

Reporting timeframes and publication formats

Timeframes

Consistent with the Australian Government’s current approach of seeking compliance information through statutory reviews of the Transport Standards, operators and providers are expected to prepare their first compliance report to coincide with the 2027 statutory review of the Transport Standards. Through the 2027 Review, the Australian Government will also evaluate the efficacy of the framework as detailed in the ‘Evaluation’ section of the framework. Noting the complexity of developing and implementing auditing and reporting arrangements, operators and providers should refer to the ‘Expectations to increase data availability over time’ section of this framework.

Operators and providers are encouraged too publish annual progress reports thereafter. Operators and providers are not expected to re-audit all assets annually. Instead, annual reports may contain progress updates incorporating any new or updated data collected in the previous twelve months. Expectations for re-auditing are outlined in the ‘Auditing’ section of this framework.

Publication

Operators and providers should publish their reports on their own websites. If an operator or provider produces a summary report collating data from contracted service providers, they should publish the summary report on their website. If an operator or provider does not have a website, the report should be available on request to stakeholders, including disability representative organisations.

If an operator or provider prepares a report containing data collated from multiple contracted service providers, they should consider how this data can be collated so it is easily understood. Operators or providers of multiple asset types should provide a single report summarising information for all their assets.

Operators and providers should publish reports in accessible formats consistent with the [Good Practice Guidelines for Engaging with People with Disability: Create accessible materials – print and digital documents](#) and the [Guide to Applying Australia’s Disability Strategy 2021-2031](#), accompanied by information noting the reporting period, methodology and explanatory information referred to in the

framework. Through the reforms to the Transport Standards, operators and providers will be required to ensure that travel-related information on their websites meets [WCAG 2.1 AA compliance](#) within five years of the amended Transport Standards taking effect.

Operators and providers should also provide their reports to the Australian Government Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts for collation on the department's website. The department will review reports to assist in assessing the efficacy of the framework, and to assess progress against Australia's Disability Strategy's Outcomes Framework and obligations under the UNCRPD. Contact information for the department is provided in the 'Further information' section. Operators and providers are also encouraged to provide pathways through which disability representative organisations can ask questions about the content of compliance reports.

Further information

For further information about the framework or to submit a compliance report, please contact the Australian Government Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts:

- Email: DisabilityTransport@infrastructure.gov.au
- Phone: 1800 621 372

Appendix A – Definitions and terminology used in this framework

The following terms used in this framework have the same meaning as in the Transport Standards.

Compliance - As outlined in section 33.3 of the Transport Standards, *compliance* with the Transport Standards may be achieved by:

- applying relevant specifications in the Transport Standards outlined in Schedule 1; or
- using methods, equipment and facilities that provide alternative means of access to the public transport service concerned (but not using separate or parallel services) with equivalence of amenity, availability, comfort, convenience, dignity, price and safety (refer also to definition of *equivalent access*). This may include direct assistance over and above that required to simply overcome discrimination.

Equivalent access - Equivalent access is a process, often involving the provision of *direct assistance*, under which an operator or provider is allowed to vary the equipment or facilities that give access to a public transport service, so long as an equivalent standard of amenity, availability, comfort, convenience, dignity, price and safety is maintained. *Equivalent access* does not include a segregated or parallel service. See Section 1.16 of the Transport Standards for further information.

The Australian Human Rights Commission (AHRC) has produced guidelines to provide clear and practical assistance to facilitate compliance with the Transport Standards using equivalent access. Further information is available on the AHRC's website at <https://humanrights.gov.au/our-work/disability-rights/publications/access-under-disability-standards-accessible-public>.

Direct assistance – Direct assistance is help given by an operator or provider:

- to make public transport accessible to a person with disability when premises, infrastructure or conveyances do not fully comply with the specifications of the Transport Standards; or
- to provide non-discriminatory access on request.
- See Section 1.15 of the Transport Standards for further information.

Temporary exemption – Under section 33A.1 of the Transport Standards the AHRC has the power to grant *temporary exemptions* from certain provisions of the Transport Standards. The effect of a temporary exemption is that discrimination covered by the exemption is not unlawful under the DDA while the exemption remains in force. See Part 33A of the Transport Standards for further information.

Unjustifiable hardship – Section 33.7 of the Transport Standards provides that it is not unlawful to fail to comply with a requirement of the Transport Standards if, and to the extent that, compliance would impose *unjustifiable hardship* on any person or organisation. However, compliance is required to the maximum extent not involving *unjustifiable hardship*. Section 33.7 of the Transport Standards and Section 11 of the DDA set out non-exhaustive lists of the circumstances to be considered (as part of all of the circumstances of the particular case) when determining whether compliance with a requirement of the Transport Standards would involve *unjustifiable hardship*.

Public transport service – A *public transport service* is an enterprise that conveys members of the public by land, water or air. A public transport service includes community transport conveyances that are funded or subsidised by charity or public money and that offer services to the public and foreign aircraft and vessels that carry passengers to, from, or in Australia and that offer services to the public. Conveyances, Premises and Infrastructure are defined below. A *public transport service* does not include a service that provides adventure travel (for example, white water rafting, ballooning or amusement park rides) except to the extent that the service operates to move the public from one location to another distant location.

Conveyance – A *conveyance* includes any of the following to the extent that they are used to provide a public transport service:

- aircraft
- buses or coaches
- ferries
- taxis
- trains, trams, light rail, monorails, rack railways
- any other rolling stock, vehicle or vessel classified as public transport within its jurisdiction by regulation or administrative action of any Government in Australia.

A *conveyance* does not include:

- charter boats, including water taxis
- limousines, including chauffeured hire cars
- self-drive rental cars.

Premises – *Premises* are structures, buildings or attached facilities that an operator provides for passenger use as part of a public transport service.

Infrastructure – *Infrastructure* is any structure or facility that is used by passengers in conjunction with travelling on a public transport service. Infrastructure does not include any area beyond immediate boarding points (for example, bus stops, wharves, ranks, rail stations, terminals).

Operator – An *operator* is a person or an organisation (including the staff of the organisation) that provides a public transport service to the public or to sections of the public. A public transport service may have more than one *operator*. An operator's obligations under the Transport Standards extends to all assets it uses to provide public transport services and information it provides related to its services.

Provider – A *provider* is a person or organisation that is responsible for the supply or maintenance of public transport infrastructure. A *provider* may or may not be an operator. A provider's obligations under the Transport Standards extends to all assets it uses to provide public transport services and information it provides related to its services.

Appendix B – Further information about related reforms to the Transport Standards and other government obligations and initiatives

Related information provision measures agreed through the reforms to the Transport Standards

The framework complements a range of separate reforms to the Transport Standards, announced in March 2024, related to the provision of information to support accessible journey planning for people with disability.

For example, once the amended Transport Standards take effect, operators and providers of public transport will be required to provide information about the accessibility features and amenities available within their public transport networks. This could include, for example, information about the availability of left- or right-hand accessible toilets, the coverage and type of hearing augmentation systems in operation, or whether a station is staffed or unstaffed. Operators and providers will also need to identify any access barriers within the network and solutions they offer. This reform will result in improved information about the degree of access available at specific points along a person's journey, make journey planning easier and enable people with disability to travel with a greater level of confidence, dignity and agency. Operators and providers will have five years to comply with this requirement, from the date the amended Transport Standards take effect.

The framework is a separate but complementary initiative that focuses on reporting levels of compliance, rather than accessibility features on particular networks or at particular locations such as a train station, bus stop or on a particular train. Reporting on compliance with the Transport Standards and providing practical information about accessibility features and amenities are both important to the experience of a person's public transport journey.

United Nations Convention on the Rights of Persons with Disability (UNCRPD)

The UNCRPD is an international human rights convention which sets out the fundamental human rights of people with disability. The UNCRPD and the Optional Protocol opened for signature on 30 March 2007 and Australia became one of the original signatories. The UNCRPD entered into force for Australia on 16 August 2008, and the Optional Protocol in 2009. Article 9 of the UNCRPD requires that people with disabilities have the right to live independently and take part in all aspects of life. To achieve this, countries must take appropriate steps to give people with disabilities access, in the same way others have access, to things, places, transport, information and services that are open to the public. This compliance reporting framework should provide information on how Australia is meeting its obligations under article 9 of the UNCRPD. Further information is available on the [Attorney-General's Department's website](#).

Australia's Disability Strategy 2021-2031

Australia's Disability Strategy 2021-2031 (ADS) is Australia's national disability policy framework and sets out a plan to continue to improve the lives of people with disability over ten years. All Australian, state, territory and local governments have committed to ADS. Policy Priority 5 under the Inclusive Homes and Communities Outcome Area of ADS aims to ensure 'Transport systems are accessible for the whole community'. Further, released in early 2025, one of the current Targeted Actions Plans (TAPs) under ADS is *Inclusive Homes and Communities 2025-2027*. This TAP specifically mentions transport as a key issue to

ensure an inclusive community and lists associated actions to meet the objective of accessible transport systems for the whole community.

Under ADS, all levels of government have agreed to ongoing and regular reporting of outcomes for people with disability, continuous data development and undertaking of disability research. This data is published annually through the ADS Outcomes Framework, which is a key initiative under ADS to measure, track and report on outcomes for people with disability. The relevant future measure in the ADS Outcomes Framework is *% of compliance with the Disability Standards for Accessible Public Transport*.

The development of data using the compliance reporting framework will support reporting against the Outcomes Framework objectives for transport system accessibility. Further information is available on the [Disability Gateway](#).

Disability Action Plans

The provision of compliance data through this framework and the requirement to provide information about the accessibility features available to passengers following upcoming amendments to the Transport Standards will also complement disability action plans created by operators and providers. The DDA encourages organisations to develop action plans to recognise and promote an active commitment to eliminating disability discrimination and to promote the recognition of the rights of people with disability. Further information is available at [Australian Human Rights Commission's \(the AHRC\) website](#).

Appendix C – Further guidance: checklists and templates

Once the framework is finalised, the working group Secretariat will develop further guidance to support operators and providers to audit and prepare compliance reports. This includes supporting checklists to be read alongside the Transport Standards, outlining which requirements in the Transport Standards apply to each type of asset. For example, the checklist may list which requirements operators and providers need to meet to ensure their bus stop infrastructure is compliant, with reference to the relevant sections of the Transport Standards for further detail. This could be presented in a format similar to the [Australian Human Rights Commission's 2010 'Guideline for promoting compliance of bus stops with the Disability Standards for Accessible Public Transport 2002' document](#). The Secretariat will also explore opportunities to develop templates to assist operators and providers to produce and publish reports.