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AUSTRALASIAN RAILWAY ASSOCIATION SUBMISSION

To the

Department of Infrastructure, Regional
Development and Cities

On the

Third Review of the Disability Standards for
Accessible Public Transport 2002



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THE ARA

The Australasian Railway Association (**ARA**) is a not-for-profit member-based association that represents rail in Australia and New Zealand. Our members include rail operators, track owners and managers, manufacturers, construction companies and other firms contributing to the rail sector. We contribute to the development of industry and government policies in an effort to ensure Australia's rail systems are well represented and will continue to provide improved services for Australia's growing population.

The ARA thanks the Department of Infrastructure, Regional Development and Cities (**DIRDC**) for the opportunity to provide this submission to the *Third Review of the Disability Standards for Accessible Public Transport 2002*. For further information regarding this submission, please contact Emma Woods, General Manager Passenger and Corporate Services via ewoods@ara.net.au or 02 6270 4507.

This submission has been developed in consultation with the ARA's Accessibility Working Group which is comprised of accessibility representatives from the following ARA members:

- Department of Planning, Transport and Infrastructure (**DPTI SA**)
- Metro Trains Melbourne (**MTM**)
- Public Transport Authority of Western Australia (**PTAWA**)
- Public Transport Victoria (**PTV**)
- Queensland Rail (**QR**)
- Sydney Trains / NSW Trains / Transport for New South Wales (**TfNSW**)
- V/Line
- Yarra Trams

1. Have ARA members been able to meet the 2017 Transport Standards legislated targets?

The Rail Industry recognises that public transport provides people with disability with independence and improves inclusion in our communities. Significant funds continue to be contributed by the Rail Industry to improve accessibility on and around railways nationally.

Due to the historic nature of some rail assets and the considerable investment required for infrastructure and rolling stock upgrades, complete access and compliance with the *Disability Standards for Accessible Public Transport 2002 (Cth)* (**DSAPT**) cannot be achieved immediately. To counter this, recognising that compliance with the DSAPT is one part of the accessibility equation, the Rail Industry believes a holistic approach is required to successfully improve accessibility. Therefore, the Rail Industry supports hard infrastructure and rolling stock upgrades with a variety of initiatives.

The Rail Industry is committed to continuously improving accessibility by upgrading infrastructure and rolling stock and actively improving the customer experience. For example, as part of this commitment to continuous improvement, ARA members:

1. engage specialists to advise on access issues and engage with the disability community to ensure operators better understand and meet their needs;
2. consult regularly with the disability sector individually and collectively regarding accessibility plans and investment decisions;
3. implement jurisdictional Disability Inclusion Action Plans;

4. regularly meet through the ARA Accessibility Working Group to share ideas and lessons learned;
5. participate and contribute to government groups such as the National Accessible Public Transport Advisory Committee (**NAPTAC**); and
6. have been taking steps, so far as is reasonably practicable, to comply with the requirements prescribed in the DSAPT.

Despite the above, since the commencement of the DSAPT in October 2002, it has become apparent that strict compliance with all of the provisions of the DSAPT has not been practically achievable for the government, or the Rail Industry. This has been evidenced by:

1. the historic and heritage nature of some rail assets which restrict accessibility upgrades to comply with the DSAPT;
2. the considerable investment required for infrastructure and rolling stock upgrades;
3. the inability by the government to complete recommendations following the 2007 and the 2012 reviews (discussed further below and at Attachment A); and
4. the need for temporary exemptions to elements within the DSAPT for ARA members.

To date, the DSAPT modernisation process has:

1. focused on a 'clause by clause' review of the current provisions of the DSAPT;
2. not completed a holistic outcome-based review;
3. not considered the inclusion of new technologies and innovations since October 2002 such as the introduction of smart devices and 'Apps' which have revolutionised the way in which accessible information is delivered to passengers; and
4. not incorporated learnings to date, such as improving the process for equivalent access.

The ARA members submit that the third DSAPT review should consider the modern outcomes which are practically achievable for all involved, including people with disability, the government and the Rail Industry.

Since the 2012 DSAPT Review, rail services have expanded, rail patronage has increased and investment in Rail has grown significantly in all jurisdictions across the country. New rolling stock has been delivered in all States, multiple tram stops have been upgraded to level access (60 tram stops have been upgraded in Victoria alone) and numerous infrastructure upgrades at train stations have been made to improve the accessibility of Australian rail networks.

The Rail Industry continues to actively work towards meeting the targets legislated in Schedule 1 of the DSAPT but strict compliance with Schedule 1 targets has not been achievable for rail operators, rail providers or State and Territory Governments. Compliance varies between jurisdictions, operators and the services, train stations and/or tram stops and rollingstock types in service.

2. If not, can you elaborate on the reasons for not being able to meet these targets?

The Rail Industry supports the existence and use of national standards as a means to ensure rail services are accessible but many elements of the DSAPT were initially taken from Australian Standards which are not

appropriate for public transport, do not reflect the rail operating environment and as a result, are impractical for rail operators to physically comply with.

Previous DSAPT Reviews

The Rail Industry recognises that reviewing the DSAPT every five years is a legislative requirement but the industry questions the value of a third review when recommendations are still outstanding (including recommendation one from review two; the vital modernisation of the DSAPT).

To illustrate the Rail Industry's perception of action made against previous DSAPT Review recommendations, the industry has compiled a summary table. Please see Attachment A – Rail Industry views of action to date.

DSAPT Modernisation

In 2014-2015, the Department of Infrastructure and Regional Development reviewed the DSAPT. Following the 2014-2015 review, the then Deputy Prime Minister and Minister for Infrastructure and Regional Development, Warren Truss made the following statement:

“A crucial issue identified in the second review was the need to modernise the Transport Standards to be able to respond to rapidly changing technology. This may provide more flexibility for transport operators and improved provision of information.”

On 10 July 2015, the Australian Government released the DSAPT Review Report which recommended that the Australian Government, jointly with state and territory governments, commence a process for updating and modernising the Transport Standards (**2015 Modernisation Review**).

The modernisation of the DSAPT is essential for all stakeholders. As per the recommendation, the modernisation and any relevant regulatory impact statement was to be completed by 30 June 2017. The modernisation has been underway for three years. Unfortunately, progress has been incredibly slow and the project timeframe has been missed with no communication regarding an updated timeline.

The Rail Industry is actively participating in the DSAPT modernisation and has flagged a number of areas within the DSAPT that are problematic – see below. The slipped DSAPT modernisation project timeframe has left people with disability, the Rail Industry and other public transport providers and operators in limbo.

In practical terms, the current approach is not working. The approach lacks a holistic or strategic view and does not consider the overall required outcomes of the community and public transport operators. Instead, a clause-by-clause review is occurring. Issues were separated into two tranches, with tranche one being the 'low hanging fruit' and tranche two the more challenging issues. Tranche one is still in progress. A Regulatory Impact Statement has been completed but public consultation is yet to commence.

The Rail Industry believes the ultimate consideration in the DSAPT modernisation should be to provide an achievable, practical means in which access to public transport can be provided for people with disability. The opportunity presented by the DSAPT modernisation cannot be missed.

ARA funded research on technical issues

Part of the recommendation to modernise the DSAPT included utilising 'research on the technical issues'. To constructively contribute, the ARA has engaged the Institute of Railway Technology at Monash University to conduct a desk-top engineering-based review of the DSAPT. The objectives being to:

- identify where elements currently in the DSAPT that are impractical for rail have been drawn from;
- articulate why certain elements currently in the DSAPT may not be practical for an operating railway to comply with; and
- propose suitable alternatives that could be incorporated through the DSAPT modernisation that are achievable for rail and provide the desired outcome for customers with disability to travel by rail.

The ARA will table the final Monash report with the Commonwealth Government for consideration in the DSAPT modernisation and hopes that it provides a credible piece of work to suitably update the DSAPT and meet the needs of people with disability and the Rail Industry.

The Rail Industry has identified a number of actions it believes will ensure the DSAPT modernisation opportunity is maximised. These are detailed in the response to question four of this submission.

Elements impacting the Rail Industry's ability to comply with DSAPT targets

There are a number of complexities that impact the ability for Australian passenger train and tram operators to comply with the DSAPT targets. Including:

- **Legacy infrastructure and rolling stock:** Australian passenger rail services first began operating in Sydney, Melbourne and Adelaide in the mid-1850's, Brisbane in 1865 and Perth in 1881. As a result, Australian passenger train and tram networks include many heritage assets that were built a considerable time before the DSAPT introduction in 2002. Legacy rolling stock and infrastructure such as existing narrow, underground and curved platforms present significant challenges for operators to meet the DSAPT.
- **Funding constraints:** Operators rely on funding allocations from State Governments to upgrade infrastructure and rolling stock to comply with the DSAPT. Like all Governments, State Governments have competing funding priorities which limit the funding made available for rail operators to invest in DSAPT-related improvements.
- **Patronage growth:** Patronage growth on passenger rail services has required operators to keep older rolling stock in service to meet patronage levels. As a result, rather than retire non-compliant rolling stock and offer less services, operators are needing to run older rolling stock to meet customer demand, particularly during peak AM and PM periods.
- **Rolling stock life:** Australian passenger rail operators currently run multiple types of rolling stock. Rolling stock life is considerably longer than other public transport modes. As a result, the rolling stock life-cycle does not allow short and mid-term accessibility improvements, hindering compliance. Retrofitting old non-compliant fleets still operating on the network to meet demand would involve significant modifications, which are not economically viable or sometimes, technically feasible.
- **Local Government and Community support:** Rail infrastructure upgrades are disruptive and can have a major impact on the productivity of cities, businesses and local economies. Infrastructure upgrades such as train station and tram stop upgrades impact road space, bike lanes and potentially remove car parks. Councils have opposing infrastructure upgrades, such as the consolidation of and transition to level tram stops due to the need to permanently remove car parks. The lack of local Governments and Community support can stop accessibility-related upgrades from occurring.
- **Operational Constraints:** The ARA estimates \$100 billion is being invested in rail infrastructure projects over the next decade. This unprecedented investment is vital to meet the needs of our growing population but the considerable works have created industry capacity constraints that are fully absorbing the available engineering and construction capacity of the Rail Industry. The once-in-

a-generation works are also limiting the availability of construction materials in the supply chain. Aspects of construction are conducted under full 'possession' which requires services to be halted. These construction windows are limited to ensure minimal impact on the network, our cities and their economies and can limit the ability for operators to upgrade legacy infrastructure.

- **Market capacity constraints:** The significant investment currently occurring in rail around Australia has limited the available workforce to deliver projects. The industry is facing a skills shortage which increases the time and cost to deliver projects. Operators use planned infrastructure works as an opportunity to increase the level of accessibility but the workforce must be available.
- **Network widths:** The width of the rail corridor creates challenges for operators. In addition, QR and PTAWA operate on narrow gauge networks, further exacerbating these restrictions. The width of track restricts the width of rolling stock carriages, creating additional challenges for narrow gauge rolling stock to comply with the DSAPT.
- **Framework complexities:** As noted above, the DSAPT, Premises Standards and how they interact with other Australian Standards makes it difficult for project teams and managers new to accessibility to determine the appropriate requirements. Simplifying the layers and general framework will assist the broader public transport industry that doesn't specialise in accessibility to understand and implement the necessary requirements.

3. Are there requirements that have proven to be impractical or difficult to implement?

The DSAPT fails to recognise the unique operating environment of passenger rail networks. Many DSAPT elements are impractical for passenger rail infrastructure and rolling stock to comply with. In addition, the prescriptive nature stifles the ability for the Rail Industry to introduce innovative or technological alternatives that could provide the desired, and at times better, accessibility outcomes for people with disability to travel by rail.

The ARA has obtained temporary exemptions from the Australian Human Rights Commission (**AHRC**) for its members to address elements within the DSAPT that are impractical for an operating railway to comply with. The current ARA exemptions expire on 30 September 2020 but until the DSAPT modernisation process is complete, the elements rail is physically incapable of complying with remain the same.

The issues within the DSAPT that present challenges and the industry's proposed solution are:

- **Boarding points to conveyances:** The DSAPT stipulates that 'boarding' must be possible from 'accessible entrances'. Clause 8.2.1 has been interpreted by the AHRC as requiring access at 'all doors'. It is noted that there is no requirement in the DSAPT for there to be access at 'all doors', further the DSAPT contemplates that accessible facilities such as allocated spaces should be consolidated. Legacy infrastructure and multiple types of rollingstock mean all door boarding is not always possible. The industry seeks clarity in the DSAPT to support the provision of access at 'designated boarding points' as opposed to 'all doors'.
- **Access paths – premises and infrastructure:** The DSAPT requires the provision of an 'unhindered continuous accessible path of travel' on premises and infrastructure but doesn't detail the extent of this path. The Rail Industry views this requirement as ambiguous and recommends that an access path should commence and end at the boundary of rail premises and be determined as a primary path of travel that provides access to accessible features and amenities and designated platform boarding points.

- **Access paths – conveyances:** The DSAPT stipulates the provision of an unhindered continuous accessible path of travel on ‘conveyances’ at a minimum width of 850mm. Trains are designed and coupled together in ‘cars’. The inter-coupling of cars provides a compliance challenge for industry to meet the access path requirements. On narrow-gauge services, access paths are further constrained by the finite width of cars. Clarity is sought on the extent of access paths on conveyances. As per Clause 9.6, Industry recommends that access paths within a conveyance can be restricted to the accessible facilities within a rail car. The Rail Industry also recommends that the extent of access paths within a conveyance should be from the designated boarding point to the allocated space on-board and other essential facilities for customers using wheelchairs and mobility aids.
- **Definitions:** The definitions of ‘waiting areas’ (7.1) and ‘access paths’ lack clarity. The Rail Industry recommends that a separate definition for ‘rail platforms’ is incorporated in the DSAPT and includes minimum requirements for boarding assistance zones, priority seating and shelter and take into consideration the needs of people with disability by articulating the desired accessibility outcome.
- **Tactile Ground Surface Indicators (TGSIs):** The DSAPT requires 600mm of safety warning TGSIs. In legacy infrastructure with narrow platforms, it is difficult to achieve the required width of the access path without including part of the TGSIs width in the measurement. Industry recommends that either TGSIs can be included within the measurement of an access path or the extent of an access path on a platform extends to the designated boarding point. Directional TGSIs are also utilised by rail operators and customers. Industry seeks clear guidance on the application of directional TGSIs within the DSAPT to assist with their rationalised use to ensure they are most effective for customers. Industry notes that consultation with the accessibility community is required on a case-by-case basis for directional TGSIs.
- **Toilets:** The DSAPT specifies that accessible toilets must be in the same location as other toilets. This is not always feasible with legacy infrastructure. The industry recommends that greater emphasis is placed on locating toilets along the accessible path of travel.
- **Passing areas:** The DSAPT specifies that a passing area must be provided at least every 6 metres along any two-way access path less than 1800mm wide. This is not always feasible on rail platforms with vertical transport such as escalators or where heritage pillars or other built structures are located. Industry recommends that this issue is addressed by clarifying the definition of and requirements for rail platforms and access paths.
- **Lighting:** The DSAPT stipulates lighting requirements at conveyance entrances and the point at which the customer pays to travel. It also points to AS1428.2 (1992) Clause 19.1. Clause 19.1 of AS1428.2 ‘recommends’ lux levels, however Clause 20.1 of DSAPT says conflicts with this stating that ‘any lighting provided must comply’ with AS1428.2. This does not consider the multiple environments within an operating railway, including WHS and other safety requirements for train drivers and passengers and creates a potential conflict with other existing standards. The Rail Industry seeks clarity in the DSAPT around illumination levels for rail premises and platforms.
- **Stair configuration on conveyances:** The DSAPT states that the preferred configuration for stairs is for each step to be 275–300mm long and 150–165mm high with an overhang of 25mm. A warning strip of contrasting colour should be 50–75mm wide to 50mm high across the nosing of each step. This stair geometry requirement for a building is not appropriate for retractable steps at railcar doors or a double deck passenger rail car where rail gauge constrains train carriage widths. Industry seeks a reduction in the width of the stairs and recommends research into the appropriate geometry for the configuration of on-board train stairs that maximises customer safety.

4. Initiatives and actions undertaken to remove discrimination against people with disability

The Rail Industry implements a wide variety of programs to actively engage people with disability regarding their needs to assist them to travel by rail.

Attachment B provides a detailed list of some of the many initiatives ARA members implement to improve accessibility. At a high level, initiatives implemented to remove discrimination against people with disability include:

- **Education and Communication:** Operators regularly engage the disability sector. Operators have developed educational campaigns, information materials and community engagement initiatives to provide clarity and information for customers with disability to travel safely in the rail environment and to engage customers with disability on improvement initiatives.
- **Engagement and Practical Trial Initiatives:** Operators hold Rail Safety and Orientation Days that allow customers with disability to familiarise themselves with rail travel by providing practical assistance and interactive learning on how to safely board and alight a train or light rail vehicle. Staff regularly present to older adults and disability sector organisations to provide information on how members of the disability community can safely and confidently travel by rail.
- **Consultation:** Operators regularly consult customers with disability individually and collectively. This ensures accessibility and inclusion plans, investment decisions and accessibility improvements are developed in collaboration with those with disability and their representative organisations. ARA members hold information and consultation sessions as part of the trial and implementation of new initiatives or projects that have accessibility components or may impact on accessibility to ensure that the needs of the disability community are appropriately considered and met. The Rail Industry values engagement and input from the disability sector to assist in better meeting the needs of these stakeholders. Feedback from ongoing consultation is actively fed into jurisdictional Disability Action Plans to facilitate industry's focus on continuous improvement and ensure the voice of the disability sector is both heard and acted upon.
- **Infrastructure:** The Rail Industry continues to retrofit rollingstock and upgrade train stations to comply with the DSAPT but due to the historic nature of some rail assets, infrastructure upgrades can be challenging to deliver and extremely costly. As infrastructure is upgraded, operators utilise the opportunity to improve accessibility. Operators include Emergency Help Points that provide direct connections to rail customer service staff who can assist people with disability over the phone and/or arrange for staff assistance. Selected stations marked as "wheelchair accessible" have:
 - level, ramp or lift access to all platforms;
 - wheelchair/mobility scooters spaces;
 - accessible toilets;
 - accessible emergency Help Points;
 - accessible payphones;
 - continuous handrails;
 - accessible audio and visual service information; and
 - easy access gates facilitate entry and exit to paid areas of stations.

- **Technology:** The Rail Industry continues to look to modern technologies as innovative ways to enhance the service and customer experience rail offers people with disability. For example, operators have developed mobile phone apps to assist customers with disability to travel confidently on rail. Although rail is investing in technologies, rail also recognises that assistive technologies can enhance the customer experience of people with disability, they do not bridge all accessibility gaps.
- **Specialist Accessibility Advisors:** As part of the Rail Industry’s commitment to continuous improvement, all passenger rail ARA members have created specialist roles to advise on access issues and broaden the focus beyond compliance to ensure an integrated whole-of-network approach to accessibility. These teams are a dedicated accessibility function who are responsible for the implementation of their operator’s Accessibility Action Plans or Disability Inclusion Action Plans and provide specialist, strategic, cross-functional advice to ensure accessibility needs for all of customers are considered and met.
- **Signage:** Operators utilise signage to guide customers on their journey. For example, for customers who use mobility devices, some ARA members include boarding assistance zones on platforms with a wheelchair-accessible symbol.
- **Partnerships:** Operators regularly partner with community groups to ensure widespread safety and access messaging as well as partnering with organisations such as Travellers Aid Australia (**TAA**) to provide additional support structures to access public transport. Operators also provide information to hospitals, disability sector organisations and suppliers of devices such as MMDs to assist in disseminating messages about how to safely travel by rail.
- **Travel assistance:** Operators offer a variety of travel assistance options for people with disability. For instance, where a platform gap exists, rail employees provide customers with mobility aids with platform-to-train boarding ramps. Depending on the station or network, this could be provided by station staff, a train driver or guard. Staff also offer training and opt-in services to help provide assistance to those who require it.
- **Staff education:** All appropriate staff are trained to assist people with disability to travel by rail and safely use boarding ramps to provide an improved travel experience.
- **Industry collaboration – Accessibility Working Group:** In 2013, through the ARA, the industry established an Accessibility Working Group to bring together representatives from all Australian passenger rail ARA members to share ideas and lessons learned to continue improving the accessibility of passenger railways throughout Australia.
- **Operator-specific Customer Accessibility Reference Groups:** Many operators convene regular forums to obtain community input into the development of non-discriminatory and accessible procedures, design work, construction and customer service.
- **Accessibility specific communication:** Operators maintain databases of disability sector organisations and individual customers with disability who wish to be notified about track closures, planned lift maintenance, changes to station access etc. Dedicated communication channels such as ‘accessibility bulletins’ aim to ensure customers are aware of alternative access options available to assist them to complete their journey with as little disruption as possible. Some operators are accredited or are in the process of becoming accredited with the Communication Access Symbol.
- **Passenger announcements:** In response to requests from peak disability organisations and customers, operators continue to train staff in passenger announcements and some operator ‘next stop’ announcements include side exit information as a stop or station is approached.

- **Operator Accessibility Plans:** Operators have developed plans which outline the process they will take to improve accessibility, including upgrades to infrastructure and rolling stock to comply with DSAPT and/or provide functional access outcomes.
- **Improved disruption management:** Operators recognise that disruptions are particularly challenging for customers with disability and have made efforts to better communicate and engage with customers with disabilities to improve their experience when disruptions occur.
- **Data:** Nationally, there is limited data regarding people with disability who travel by public transport. There is no requirement for people with disability who travel by public transport without assistance to identify or report that they are using a service. As a result, patronage data is typically focused on when assisted boarding is provided.

Recommendations

The Rail Industry believes the third DSAPT review and current DSAPT modernisation presents a number of opportunities. To ensure an optimal outcome for all stakeholders, the ARA recommends:

- **DSAPT Modernisation Project:**
 - o **A transparent timeline for the DSAPT modernisation:** The initial timeframe for the DSAPT modernisation has slipped significantly with no communication on an updated timeline. As a result, people with disability, public transport operators and State Governments are in limbo awaiting changes to the infrastructure and rolling stock upgrades required to comply. Establishment and communication of a revised a timeline would benefit all stakeholders.
- **Structure / Content of the DSAPT:**
 - o **Focus on accessibility outcomes rather than prescription:** The industry believes the objective of modernising the DSAPT should be to focus on the outcome sought; enabling people with disability to travel by public transport. Rather than a prescriptive DSAPT which hinders innovation, such as the prescription of hearing loops which are now old technology, the industry recommends the modernised DSAPT should identify the desired and/or intended accessibility outcome that public transport operators should achieve. This will encourage innovation and technological solutions in providing accessibility.
 - o **Mode specific DSAPT requirements:** Heavy and light rail, buses, ferries etc each have very different operating requirements and therefore their abilities to physically comply with standards differ. Establishing mode specific elements within the DSAPT for different public transport modes would be a practical solution to address and reflect the different operating environments of different modes of public transport and will assist in making the requirements more applicable.
 - o **Consider the Monash University research outcomes:** The outputs from the ARA funded Monash University research will provide engineering-based solutions for elements in the DSAPT that are impractical for the Rail Industry to comply. To assist the Commonwealth Government in implementing recommendation 1 of the 2012 DSAPT Review, to modernise the DSAPT and include research on technical issues, the Rail Industry will table the Monash Report with the Government. Pending the outcome of the Monash University research, the industry requests that each of the options proposed by Monash are considered as part of the DSAPT modernisation.
 - o **Clarity around 'equivalent access':** Similar to the different interpretations of the DSAPT, there are different interpretations of 'equivalent access'. Through the DSAPT modernisation, and the supporting guideline, Industry seeks clarity around what is deemed 'equivalent access'.
- **Schedule 1 / Measuring compliance:**

- **A review of compliance timeframes:** Once the DSAPT modernisation is complete, the Rail Industry recommends that it is accompanied by a review and update of compliance timeframes to recognise the establishment of and need to meet the requirements of a new DSAPT.
 - **A review of DSAPT compliance measures to reflect accessibility:** Compliance with the DSAPT and levels of accessibility are two different things. Compliance is a measure against the DSAPT whilst accessibility measures the customer outcome (or level of accessibility provided). Schedule 1 of the DSAPT provides compliance percentage targets, the measurement of which is problematic, doesn't accurately reflect the level of accessibility provided and doesn't always encourage the right investment. Strict compliance and measurement against the DSAPT is not an accurate reflection of the level of accessibility provided. The Rail Industry recommends the measure for compliance with the DSAPT is reviewed to ensure the focus is on the outcome and therefore, level of accessibility achieved. For example, if a tram stop requires 10 elements to comply with the DSAPT and 9 are completed, this would be viewed as 90% compliant yet the final component may be level access which is a significant factor in providing access.
 - **Establishment of a nationally consistent accessibility measure:** Currently, no consistent framework for compliance assessments exists. Every rail network is unique and different and there are different interpretations of the DSAPT, different approaches in how to measure compliance levels and as a result, many inconsistencies between jurisdictions. The Rail Industry knows what compliance is but lacks a consistent framework to report against. As part of reviewing the compliance measure to ensure it more accurately reflects accessibility outcomes, the Rail Industry recommends the establishment of a nationally consistent assessment measure, possibly with weightings linked to accessibility outcomes. This would help achieve consistent reporting against a fully modernised DSAPT. Industry is willing to work with the Government and other stakeholders to develop a practical national reporting framework.
- **External considerations:**
- **Simplify the framework:** Rail operators and rail infrastructure managers are accredited to operate under the Rail Safety National Law (RSNL). The obligations under the RSNL can be inconsistent with the DSAPT and Premises Standards, particularly in emergency situations which whilst uncommon, do still occur. The DSAPT and Premises Standard point to multiple additional standards which can cause confusion for people new to the accessibility area trying to determine what is required to comply. Simplifying the framework will benefit all, decrease the chance of errors being made and assist in making accessibility requirements clearer to a broader audience.
 - **Drive local government engagement:** Currently local Governments can stop upgrade works taking place. This limits the Rail Industry's ability to comply with the DSAPT. A mechanism to incentivise or encourage local governments to support DSAPT upgrades would be beneficial.

CONCLUSION

Providing accessible public transport on passenger rail networks is one of the Rail Industry's highest priorities. ARA members will continue to support infrastructure and rolling stock upgrades with a broad range of initiatives to make rail more accessible. These are detailed in response to question four and Attachment B.

Irrespective of funding, the current DSAPT contains requirements that are physically unachievable for the Rail Industry. This is detrimental for people with disability, governments and public transport more broadly. These issues must be addressed through the DSAPT modernisation. As well as engaging Monash University to provide the technical research required, the Rail Industry has identified and provided a number of solutions in this submission that the Rail Industry believes will improve the DSAPT modernisation process and achieve an outcome that benefits and meets the needs of all stakeholders. These are detailed in response to question three under sub-heading 'Recommendations'.

The Rail Industry welcomes the opportunity to continue working with Governments on the DSAPT modernisation and to improve access for all on Australian passenger rail networks.

Attachment A: DSAPT Reviews – Rail Industry views of action to date

2007 Review

The 2007 DSAPT Review was completed by Allen Consulting Group with the final report released by the Australian Government on 3 June 2011. The 2007 review made 15 recommendations (9 systemic and 6 mode-specific). These were then superseded by the 2012 Review which made 7 recommendations.

Below is a synopsis of the Rail Industry’s views regarding progress made against each of the 15 recommendations.

Recommendations	Action to date
Recommendation 1: Establish a national framework for Action Plan reporting and require annual reporting by each State and Territory government	Did not proceed.
Recommendation 2: Request the ABS include questions on public transport patronage in their Disability surveys	Limited public transport patronage data included in ABS data via the Survey of Disability, Ageing and Carers.
Recommendation 3: A technical experts group be convened, with Standards Australia, to develop technical standards specifically suited to public transport conveyances and infrastructure. Once developed, these Standards should be referenced in the Transport Standards, and made available for public use.	Did not proceed.
Recommendation 4: Mode specific guidelines be developed by modal sub-committees. These guidelines would be a recognised authoritative source for providers which can be used during a complaints process.	Did not proceed.
Recommendation 5: A mobility labelling scheme be developed which identifies the weight of the aid and whether its dimensions fit within the dimensions for allocated spaces, boarding devices, access paths and manoeuvring areas on conveyances, as specified in the Transport Standards.	A Committee was formed and met on a few occasions. The matter was eventually referred to Austroads.
Recommendation 6: A best practice clearinghouse be established in a government agency or research body to collect and disseminate best practice solutions and ideas relating to accessible public transport.	Did not proceed.
Recommendation 7: Commonwealth, State and Territory governments provide funding for projects in regional and rural regions where local governments are unable to resource upgrades of public transport infrastructure.	Implemented in part as State and Territory governments have always contributed funding to upgrade infrastructure across their jurisdictions. The Commonwealth has provided funding for major public transport projects which include the provision of accessible infrastructure, but do not contribute to all public transport projects.

<p>Recommendation 8: The AHRC be tasked to provide greater support for representative complaints on behalf of people with disability, reducing the legal cost burden on individuals.</p>	<p>The Commonwealth attempted to address this issue via a proposal to merge the 5 discrimination instruments into a single instrument. This proposal would have allowed for class actions, and the ability to take matters direct to Federal Court without mediation. The proposal attracted considerable media attention and political backlash (particularly in respect of its impact on employment law). As a result, it was withdrawn by the Australian Government.</p>
<p>Recommendation 9: New governance arrangements be implemented to establish accountability for progressing recommendations from the five-year Review. APTJC should have coordinating responsibility for new initiatives (including modal committees and the technical experts group) in partnership with APTNAC.</p>	<p>Was implemented, but later overturned by the decision to merge APTJC and APTNAC under the Cutting Red Tape program.</p>
<p>Recommendation 10: The 2017 compliance milestone for tram conveyances and infrastructure be reduced from 90 per cent to 80 per cent to better reflect vehicle replacement cycles.</p>	<p>Did not proceed.</p>
<p>Recommendation 11: The taxi modal sub-committee be tasked with developing a staged implementation timeframe similar to that for other modes of transport, and an appropriate performance measure, to replace the 2007 milestone for WAT compliance.</p>	<p>This proposal was assigned to the Taxi Regulators Group which failed to reach agreement after two years.</p>
<p>Recommendation 12: Government commission research into the safety of passengers travelling in conveyances whilst seated in mobility aids (including scooters). This research should make recommendations around whether there is a need for an Australian Standard addressing this aspect of safety for mobility aids.</p>	<p>Did not proceed.</p>
<p>Recommendation 13: The Transport Standards be amended to require new community transport vehicles greater than 12 seat capacity to comply with the Transport Standards commencing in 2017, (with full compliance by 2032).</p>	<p>This recommendation was not supported by APTJAC. In particular, there was a view that it could create perverse outcomes by encouraging providers to opt for smaller vehicles to avoid the compliance requirement. This would reduce overall supply of CT vehicles.</p>
<p>Recommendation 14: Phased application of dedicated school bus services to physical access requirements in the Transport Standards, commencing in 2029 and being fully required by 2044.</p>	<p>This recommendation was not supported by APTJAC, largely on the basis of provision through the assisted school transport scheme. It should be noted that this position is no longer in alignment with jurisdictional positions in respect of the</p>

	National Disability Strategy and the NDIS rollout.
Recommendation 15: Air travel modal sub-committee (the Aviation Access Working Group) be tasked to develop guidance on the carriage of mobility aids on aircraft	Developed and available on the DIRDC website.

2012 DSAPT Review

The 2012 DSAPT review made 7 recommendations which superseded the 15 recommendations made in the 2007 DSAPT review. Below is a synopsis of the Rail Industry's views regarding progress made against each of the 7 recommendations.

Recommendations	Action to date
Recommendation 1: That the Australian Government, jointly with state and territory governments, commence a process for updating and modernising the Transport Standards. This work should be undertaken in close consultation with industry, local government and the disability sector, and include research on the technical issues raised in this review, the development of options, and assessment of the impact of any proposed changes to the standards, with this work to be completed by 30 June 2017.	Underway, but process has been slow. Not completed in time.
Recommendation 2: That the Australian Government, jointly with state and territory governments, establish a national framework for reporting on progress against the Transport Standards by 31 December 2016.	Deferred until after completion of recommendation 1. This is due to the expectation that the Modernisation process would introduce new standards to report against.
Recommendation 3: That the Australian Government considers the concerns raised about the complaints process.	No recent work undertaken. This would be a matter for Commonwealth Attorney Generals and may be on hold until recommendation 1 is complete.
Recommendation 4: That the Australian Government, jointly with state, territory and local governments, develop accessibility guidelines for a whole-of-journey approach to public transport planning by 30 June 2016.	Complete.
Recommendation 5: That the Australian Government, in collaboration with state and territory governments, develop and implement a national motorised mobility device labelling scheme.	Underway as part of the Austroads Motorised Mobility Device Project blue/white labelling scheme but no clear timeframes for delivery. The Technical Specification (SA TS 3695.3 (Requirements for designation of powered wheelchairs and mobility scooters)) was published in 2018.

<p>Recommendation 6: That the Australian Government, jointly with industry, state and territory governments, develop consistent national compliance milestones and response times for wheelchair accessible taxis by 31 December 2016.</p>	<p>This recommendation needs to be considered within recommendation 1. In the current de-regulated environment, the target of equivalent response times is meaningless as there is not a consistent agreed approach across jurisdictions. Rather DSAPT should focus on a determination of appropriate definition of a WAT, are ride share, chauffer cars etc considered as WATS.</p>
<p>Recommendation 7: That the Department of Infrastructure and Regional Development, in close consultation with the Aviation Access Forum, undertake a review of the Disability Access Facilitation Plan initiative by 30 June 2015, with the aim of improving the overall effectiveness and accessibility of the plans.</p>	<p>DIRDC has developed guidelines and templates to assist operators in preparing their Disability Access Facilitation Plans.</p>

Attachment B: ARA member accessibility initiatives to improve accessibility

ARA members recognise that improving accessibility on rail networks requires a multi-faceted approach. As a result, ARA members actively engage the disability sector and implement various initiatives to make heavy and light rail services more accessible.

A list of some, but not all, of the initiatives implemented by ARA members follows:

Education and Communication

- **DPTI, SA:** The DPTI Communications team produces all information and materials for community with accessibility in mind. The Adelaide Metro website contains information about accessible journeys on public transport to ensure all passengers have clarity around their intended journeys.
- **MTM:** MTM has a dedicated team to engage with community groups and increase their knowledge and confidence around services provided by the operator. The Community Education Unit routinely delivers travel training on the network in partnership with disability service providers.
- **PTAWA:** The PTA has produced an Accessibility Information Kit to help people with disability travelling on the Transperth network.
- **PTV:** PTV is working to provide better accessible communication around train, tram and bus services and to organise educative activities to raise awareness and better support users with accessibility needs, through:
 - o ensuring all PTV Hubs and the PTV call centre are accredited with the Scope Communication Access Symbol, enabling staff to communicate more successfully with people who experience communication difficulties
 - o developing a Master Style Guide and a Passenger Experience Regime, which set out guidelines and requirements for announcements, to be followed by operators, ensuring

- accessibility and consistency. The Master Style Guide is being regularly updated to support excellent service
- working to integrate the PTV and myki websites into a single site to make it faster, accessible, more intuitive to use and more secure. The new mobile friendly site will be accessible (according to the international Web Content Accessibility Guidelines 2.0 AA standard (WCAG)), to make it easier to use for people with disability, those with low literacy or those with English as a second language and will provide journey planning, timetable information, real time departures, disruption information and interactive mapping.
- continuing to roll out across the network Passenger Information Displays, and keeping passengers informed through automated and manual announcements
- regularly organising significant and popular training and awareness events, such as the Travelling in The Shoes of Others workshop, aiming to give participants an opportunity to experience travelling on the public transport network with a simulated visual or mobility impairment. This inspires and enables staff to consider what role they can play in their own work to help ensure that the public transport network is accessible to all
- continuing to sponsor Dialogue in the Dark, a Guide Dogs Victoria initiative which allows participants to experience simulated environments in complete darkness, raising awareness about some of the accessibility challenges faced by those who are blind or have low vision.
- **Queensland Rail:** Queensland Rail categorises stations as having “independent”, “assisted” or “limited” access. These categories are distinct from compliance, and in parallel with the Station Access Guide, are intended to provide customers with an easy-to-understand summary of functional accessibility at each particular station on the Citytrain network.
- **Sydney Trains / NSW Trains / TfNSW:** The Transport for NSW (TfNSW) website, www.transportnsw.info is compliant with WCAG 2.0 and includes visual displays for people planning trips. The Customer Hotline; 131 500 is accessible for hearing impaired people via the National Relay Service and through a TTY telephone. Transport for NSW also engages with the disability sector on a regular basis regarding changes and upgrades to infrastructure and transport services. The Accessible Travel brochure also is available to assist customers with trip planning and also provides a list of accessible stations and facilities for the Sydney Trains and Intercity networks.
- **V/Line:** V/line conducts regular community forums and continues to improve the accessibility of information available to customers, on its website and in print. Recent improvements include better timetable information, more accessible network maps (including four stations with accessibility maps and developments in place to include all stations), increased font sizes on communications (including provision of large-print versions to people with specific requirements on request), simplicity of language and explanations of printed diagrams and proper colour matching (no clashing colours). V/Line is working towards full compliance with WCAG 2.1. Bookings for passengers with accessibility requirements can be made online and the Journey Planner on the website is being reviewed to enable full accessibility.
- **Yarra Trams:** Yarra Trams website was upgraded in June 2018 to make it easier to navigate and find information. The website is compliant with Level AA of the WCAG 2.0. A current marketing campaign has a target audience of seniors, advising safe travel tips and spreading the message about priority seating.

Engagement and Practical Trial Initiatives

- **DPTI, SA:** DPTI regularly reviews and adapts audible announcements for all train and tram services to ensure understanding across the community of service routes, particularly for vision impaired people who are accessing DPTI services. This has included changes to announcements following alterations to the tram network that saw trams terminating at different locations and taking different routes following major infrastructure changes.

- **MTM:** MTM has a dedicated Accessibility Team who actively engage localised users and representative group to understand impacts on upcoming infrastructure, rolling stock and network changes. This has included the Box Hill Trial, in which over 20 people using wheelchair were invited to a practical exercise in testing gaps between the train and platform.
- **PTAWA:** Transperth has been undertaking presentations, displays and station tours as part of Transperth's Get on Board education program for communities. Transperth delivers this program to a broad range of groups including disability groups and other community groups.
- **PTV:** PTV organises the Try Before You Ride event designed to provide people of all abilities the opportunity to familiarise themselves with public transport. This includes people with a disability, parents with children and seniors. This annual event is organised with the support and participation of Victorian operators. It gives customers access to a range of stationary vehicles, offering a chance to boost confidence in boarding and alighting.
- **Queensland Rail:** QR runs quarterly Rail Safety and Orientation Day events, where customers with disabilities have the opportunity to explore a train and closed platform. They can practice boarding and disembarking in a controlled environment, and speak first-hand with front line staff and members of the Accessibility team.
- **Sydney Trains / NSW Trains / TfNSW:** Transport for NSW has developed the First Stop Transport Travel Training which is a program designed to assist customers in how to use public transport. Training is currently being offered on behalf of Transport for NSW by a number of Community Transport providers. Travel training can include topics such as getting to and from public transport, using trip planning services, types of tickets and identifying accessible services.
- **V/Line:** V/Line hosts regional 'Try Before You Ride' sessions that enable customers (both with or without accessibility constraints) to trial getting on and off regional trains and coaches. Local staff are available to answer questions regarding travelling and particular lines. V/Line also participates in an annual PTV led event in Box Hill.
- **Yarra Trams:** As well as participating in an annual 'Try Before You Ride' event at Box Hill Interchange, Yarra Trams runs 'Get back on Board' programs from three tram depots. These sessions involve a safety presentation with tram travelling tips and participants practicing boarding and alighting from a stationary tram. 10 sessions are run annually and are mainly attended by rehabilitation program clients.

Consultation and Customer Accessibility Reference Groups

- **DPTI, SA:** DPTI seeks guidance and advice from its Disability Access and Inclusion Committee regarding any relevant topic, project or public transport matter. This Committee is made up of service and consumer representatives with lived experience of disability, and has been revamped in 2018, to increase the number of consumer representatives, expand the topics included on agenda's, and encourage the use of the committee more broadly across the department and for external stakeholders involved in DPTI projects.
- **MTM:** MTM has a dedicated Accessibility Reference Group who provides strategic advice and direction to the organisation to address emerging access issues. The group also acts as a key point of contact when inviting passengers with disability to engage in consultation for potential modifications to the network.
- **PTAWA:** The PTA undertakes consultation to ensure a consultative process on accessibility issues for key projects such as the East Perth Train Station upgrade, the new Perth Stadium and Forrestfield Airport Link. The PTA established Accessibility and Inclusion Reference Groups who meet throughout all stages of the project.
- **PTV:**
 - o chairs an Accessible Public Transport Operations Committee (APTOC), set up to identify, discuss and resolve issues affecting accessibility. APTOC brings together public transport

- operators (including Metro Trains Melbourne, Yarra Trams, V/ Line and bus operators) and other key transport contributors
 - is regularly engaging with accessibility advocacy groups (such as: All Aboard, Guide Dogs Victoria, Vision Australia, Vicdeaf, Scope, Yooralla and Arthritis Victoria) to receive feedback, advice and expertise on a range of public transport projects and initiatives
 - is supported by the Public Transport Access Committee (PTAC), which has been appointed by the Minister for Public Transport to provide independent strategic advice for a public transport system that is inclusive and accessible to all (disabled persons, the elderly and vulnerable groups).
- **Queensland Rail:** Queensland Rail consults with our Accessibility Reference Group (ARG). This is a strategic level meeting which functions in a consultative and advisory capacity, by which Queensland Rail can ensure the needs of people with disabilities are considered in the planning and development of accessible rail services. Membership includes representation from a variety of peak disability sector organisations including Better Hearing Australia, MS Society, Guide Dogs Queensland, Vision Australia, Cerebral Palsy League, Endeavour, Council of the Ageing, Queensland Disability Network, Autism QLD, Carer's QLD, Down Syndrome QLD, Dementia Australia and Transport and Main Roads. Meetings are held quarterly with additional meetings called as required.
- **Sydney Trains / NSW Trains / TfNSW:** Transport for NSW continues to hold regular meetings with Accessible Transport Advisory Committee. The committee has representatives from disability and ageing organisations, who provide expert guidance on access and inclusion to Transport for NSW. Working groups are created as required to provide advice on specific, major upgrades to public transport infrastructure and services. In addition, Transport for NSW runs extensive user testing in relation to new infrastructure projects and upgrades. For example, a prototype station and platform for the Sydney Metro Northwest project was constructed at Rouse Hill. User testing has been conducted by customers with vision impairment, customers with mobility restrictions, older people and people with cognitive disability, to ensure that the new train line is fully accessible. The extension of the light rail system into the CBD will include a pedestrian zone on George Street between Hunter and Bathurst Streets. Prototypes of tactile hazard perception strips have been tested by customers with vision impairment and wheelchair users to ensure the comfort and safety of both user groups in the pedestrian zone.
- **V/Line:** V/Line utilises its Customer Accessibility Reference Group for direct customer engagement. This group meets quarterly and identifies key drivers for accessibility improvement projects under the V/Line Accessibility Action Plan 2015-18.
- **Yarra Trams:** Yarra Trams consults with passengers with disability through the members of our Accessibility Reference Group. This was established in 2013 and meets every quarter to discuss current and upcoming projects including infrastructure and rolling stock upgrades, as well as the development of our Accessibility Action Plan.

Infrastructure

- **DPTI, SA:** In South Australia, train electrification has seen improvements in accessibility achieved through new stations. The tram network will be fully accessible following the completion of works on the only remaining inaccessible tram stop. Each conveyance has ramps for deployment for assisted boarding where required, and include allocated spaces. All current rolling stock feature fully accessible carriages with allocated spaces onboard and access ramps for assisted boarding. Where upgrades are completed or new stations are built, full compliance is met by DPTI in the development of the infrastructure.
- **MTM:** All metropolitan train stations are accessible via ramp or lift, except for Heyington. Over 150 Raised Boarding Platforms have been installed, allowing unassisted boarding for some passengers.

All trains operating on the metropolitan rail network are accessible via assisted boarding (ramp deployed by the driver/ customer service staff). New PIDS have been installed in 144 stations. Works have been carried out to upgrade accessible parking, TGSIs, ramps, toilets, shelters, waiting rooms, lift installation and handrails. MTM has introduced a new platform standard which allows some passengers to board without the assistance of the driver. Lift availability has improved at 40 stations.

- **PTAWA:** In Western Australia, a significant portion of the PTA's facilities comply with the Transport Standards. The PTA has progressively upgraded its existing infrastructure to ensure it complies with the Transport Standards, including:
 - o Better Stations Program Upgrade – Fremantle and Maddington stations, Mirrabooka Bus Station.
 - o DDA Upgrade Project Stage 1 – regional rail stations, tactile ground surface indicators and seating at selected stations.
 - o DDA Minor Stations Upgrade Project Stage 2 – Beckenham, Meltham, Mt Lawley, Kenwick and Queens Park stations and track works at 13 stations.
 - o During 2017/2018, the PTA completed the upgrade of East Perth station and completed the construction of the Optus Stadium station.
 - o To increase the accessibility of public rail transport to the regional area of Western Australia, the PTA plans to upgrade key regional train stations over the next three years. The upgrade will include a high-level platform, ramps, stairs and handrails in accordance with the DSAPT. Yarloop Train Station was upgraded in 2017/2018 and the upgrade of Carrabin is expected to be completed in 2018/2019.
- **PTV:** Infrastructure projects that are resulting in improved accessibility are being delivered across the rail and tram network in Victoria, and are presented here from the Victorian operators (MTM, YV and V/Line). As a snapshot:
 - o in the 2017-18 Budget, the Victorian Government allocated \$11.3 million for tram stop and station works to improve accessibility
 - o the Victorian Level Crossings Removal Program is resulting in station rebuilds and upgrades to station access
 - o additionally, infrastructure projects to improve accessibility are continuously undertaken. Some of such projects undertaken in the last year include:
 - installing new accessible toilets at Ashburton, Mt Waverley and Altona stations
 - automation of accessible toilet doors at Camberwell, Caulfield, Essendon, South Yarra, Oakleigh and Richmond stations
 - installing tactile ground surface indicators at Altona, Mt Waverley, Rushall, Windsor and Tooronga stations
 - an interim upgrade of the lifts at Watergardens station
 - raised boarding pads at seven stations.
- **Queensland Rail:** Queensland Rail has upgraded 5 stations as part of the Station Accessibility Upgrade program. This program is a \$385 million investment from the QLD Government to improve the accessibility of QR stations. A further 9 stations upgrades have been announced as part of the program.
- **Sydney Trains / NSW Trains / TfNSW:** Transport for NSW has a number of programs which are investing in the retrofit of rollingstock and upgrade of train stations to comply with the DSAPT. Currently, 209 stations on the Sydney Trains and NSW TrainLink network are wheelchair accessible out of a total of 370. The Transport Access Program is an initiative to provide a better experience for public transport customers by delivering accessible, modern, secure and integrated transport infrastructure. To date, total investment in the Transport Access Program has resulted in an investment of over \$2 billion since 2011 making more than 90 percent of customer journeys

accessible. The Fleet Delivery Program is providing new trains for a more comfortable, reliable, efficient and accessible journey. This includes new suburban, intercity and regional trains. The program is also delivering an upgrade of the Tangara fleet to extend their life and align the rollingstock with the latest generation of trains on the Sydney network. This includes an improvement of accessibility features such as on-board visual passenger information systems, colour contrast doors and handrails, priority seating and emergency help points. All new services and stations, stops for both the Sydney Metro and Sydney Light Rail will be fully accessible for customers.

- **V/Line:** All V/Line stations are accessible via a step free entrance. Significant work has been completed to improve pedestrian crossings and remove level crossings, to increase safety. This includes the use of VeloSTRAIL, where appropriate. In addition VeloSTRAIL is being trialled to increase safety. Investment into a variety of projects has and will continue to increase accessibility, including but not limited to the Regional Rail Revival (RRR) works delivering upgrades along all V/Lines corridors (including station facility and access upgrades, track and signalling works) and station facilities and carpark upgrades projects outside of RRR projects. V/Line established Boarding Assistance Zones on station platforms to provide a key location for customers to seek assistance and support safe boarding of trains.
- **Yarra Trams:** 60 tram stops have been upgraded to level access stops and 70 additional low floor trams have been delivered since 2012. The number and location of next stop request buttons on board trams has been reviewed and funding has been allocated to fit more on C and D Class trams. Vehicle Passenger Information Systems have been fitted to 74% of the tram fleet, providing next stop audio and visual information. Yarra Trams Passenger Information Displays (PIDs) have been installed at more tram stops and at train stations, to provide next tram arrival information, including whether trams will be low floor.

Technology

- **DPTI, SA:** DPTI introduced its MetroMate App in 2016. This provides real time, up-to-date public transport information to assist people with disability to travel by all modes of public transport in South Australia.
- **MTM:** MTM has developed apps such as 'Metro Notify' and 'Stop Here', which give passengers with sensory disabilities another option to receive notification of their arrival at their next station straight to their smart device. MTM has also employed new technologies such as 'wheelchair movers' to create more opportunity for direct assistance at locations with steep ramps. These devices allow staff the ability to assist passengers using manual wheelchairs up and down steep gradients, with no risk to staff or passenger safety. Seven of these devices will be rolled out on the MTM network by the end of the year.
- **PTAWA:** Transperth and Transwa have developed alternative passenger information display systems including an accessibility bulletin and My Alert notifications, a Transperth Assist app, My Alert subscription service and dedicated Transperth and Transwa webpages for accessible services.
- **PTV:** PTV is undertaking a trial allowing passengers to touch on and off using their mobile phones (mobile myki). The aim is to eliminate the need to use a card to access the network, which is an innovation desirable for people with disabilities. The trial is underway and the early feedback is being used to refine the technology.
- **Queensland Rail:** Queensland Rail has an app to assist customers with information regarding our services. There is also the TransLink journey planner app which allows customers to plan their journey which may be multi-modal.
- **Sydney Trains / NSW Trains / TfNSW:** Transport for NSW has released a number of smart phone apps to provide customers with real time information of transport services. Some real-time travel apps have improved their accessibility features. For example, Arrivo Sydney provides next stop

audio announcements and is optimised for android accessibility, support of screen readers and large text. New tech products are also being trialled to identify other mechanisms to communicate with people with disability.

- **V/Line:** V/Line has developed virtual tours, which are available online for customers in the coming months. V/Lines services are also included in PTV's Journey Planner (available on the internet or via a smart phone app).
- **Yarra Trams:** Yarra Trams' app tramTRACKER is regularly updated to ensure all the information is up to date. tramTRACKER provides real time next tram arrival information, identifies whether trams are low floor and displays information about both planned and unplanned service disruptions. The app works with the voiceover software built into phones to provide information to passengers with vision impairment.

Travel assistance

- o **DPTI, SA:** Get On Board is a program funded in SA by DPTI that aims to make it easier to access public transport in the City of Playford. This program sees volunteers assist people as travel companions.
- o **MTM:** MTM's Community Education Unit carries out regular travel training for people requiring additional confidence in accessing services. MTM also partners with Travellers Aid, a community organisation who provides travel assistance such as companion service and personal care.
- o **PTAWA:** Transperth provides agreed assistance to people with a disability to access the Transperth network, including but not limited to providing ramps and helping a passenger to embark and disembark from a train. Many passengers have permanent bookings for direct assistance. Alternatively, passengers are able to request assistance by contacting Transperth Customer Service an hour before travel.
- o **Queensland Rail:** offers an assisted travel card to customers with disabilities. An entirely voluntary initiative that is the same size as a business card, it can assist customers who choose to identify as having a medical condition or disability. The card outlines the customer's relevant travel requirements, and can be shown to Queensland Rail staff as required to obtain assistance when travelling. The card may be particularly useful for people with hidden and cognitive disabilities.
- o **Sydney Trains / NSW Trains / TfNSW:** Due to the variances between platforms, portable boarding ramps are provided to assist customers from the platform to the train. Portable ramps have been rolled out to Sydney Trains and Intercity stations. There are currently two lengths of boarding ramp utilised by station staff, 165cm and 125cm, to assist managing the variation between different platforms.
- o **V/Line:** Conductors on board V/Line services provide direct assistance to customers when compliance requirements cannot be met. This helps to ensure that customers are able to access all available services. Direct assistances include deployment of boarding ramps, and support to access café facilities on services equipped with food services.
- o **Yarra Trams:** Customer Service Employees (CSEs) are positioned at key tram stops in the Central Business District to provide assistance to passengers. During special events and planned disruptions, CSE's are located at tram and bus interchange points to help passengers move between modes.

Staff education

- **DPTI, SA:** All staff of DPTI receive initial and ongoing training relevant to disability awareness, frontline staff receive sighted guide training, and train and tram drivers have training to facilitate assisted boarding.

- **MTM:** Disability training is provided to all frontline staff. MTM is going through the process to gain the Communication Access Symbol accreditation, which involves training over 2000 frontline staff to interact with people with communication difficulties.
- **PTAWA:** The PTA has developed a staff training DVD titled “Disability Awareness Training for Frontline Staff” delivered to all frontline staff including drivers and customer service personnel.
- **PTV:** PTV staff and the operators’ staff can participate in the Travelling in The Shoes of Others workshop, aiming to give participants an opportunity to experience travelling on the public transport network with a simulated visual or mobility impairment. This inspires and enables staff to consider what role they can play in their own work to help ensure that the public transport network is accessible to all. Also, PTV staff is encouraged to attend the Dialogue in the Dark, a Guide Dogs Victoria initiative, sponsored by PTV, which allows participants to experience simulated environments in complete darkness, raising awareness around accessibility challenges faced by those who are blind or have low vision.
- **Queensland Rail:** In response to customer and ARG feedback, Queensland Rail is currently updating front line staff accessibility awareness and assistance training to place a greater emphasis on hidden disability. Content for Rail Traffic Guards has been significantly revised, with the equivalent for other customer-facing roles planned to follow. Options for involving people with disabilities more directly in the delivery of training are also being explored.
- **Sydney Trains / NSW Trains / TfNSW:** Transport for NSW is working collaboratively with NSW Trains and disability service provider Northcott to improve the training in disability awareness of customer service staff. This will include improved understanding of communication techniques and the broader understanding of how to assist all customers.
- **V/Line:** In 2016 V/Line became the first public transport operator to become accredited with the Communication Access Symbol. This included disability awareness training and a variety of tailored communication tool kits for both station staff and conductors. V/Line undergoes annual assessment against the Communication Access Symbol to ensure that staff knowledge is retained, and continual improvement opportunities realised. In addition, in 2018, V/Line commenced online disability awareness training to all staff to increase understanding and knowledge of the experience of customers with disability.
- **Yarra Trams:** Yarra Trams has strengthened its focus on accessibility awareness training. The accessibility component of the frontline staff induction and refresher training packages has been refreshed. All current non-frontline staff are also participating in a newly developed accessibility training package, focused on raising awareness and further embedding accessibility into everything we do. A new accessibility induction package for non-frontline staff has also commenced for new staff joining Yarra Trams. In addition, Yarra Trams is in the process of obtaining the Communication Access Symbol accreditation, which includes a bespoke training component for frontline staff.

Accessibility specific communication

- **DPTI, SA:** DPTI provides relevant and up-to-date information that is accessible for the whole community. The MetroMate App allows for realtime alerts for services including interruptions and changes and any community member can access this in an accessible form. Disruptions and service changes that are pre-planned are communicated through signs at relevant stations and through communication to peak disability agencies to communicate to their members.
- **MTM:** MTM maintains a database for passengers with accessibility needs to receive email updates about changes to the network and opportunities to be involved in consultations. Changes to accessible travel, such as temporary lift unavailability, are communicated through real-time apps and remote announcements.

- **PTAWA:** Accessibility Bulletins are sent to individuals and groups who sign up for the Accessibility Group via TravelEasy. Accessibility specific information is also provided on the dedicated Transperth and Transwa webpages for accessible services.
- **PTV:**
 - o All PTV Hubs and the PTV call centre are accredited with the Scope Communication Access Symbol, enabling staff to communicate more successfully with people who experience communication difficulties
 - o PTV has developed a Master Style Guide and a Passenger Experience Regime, which set out guidelines and requirements for announcements, to be followed by operators, ensuring accessibility and consistency. The Master Style Guide is being regularly updated to support excellent service
 - o PTV is working on a new website which is fully accessible (according to the international Web Content Accessibility Guidelines 2.0 AA standard) and more user friendly. It will integrate with the myki website into a single site to make it faster, accessible, more intuitive to use and more secure, to make it easier to use for people with disability, those with low literacy or those with English as a second language. It will provide journey planning, timetable information, real time departures, disruption information and interactive mapping, including information on accessibility.
- **Queensland Rail:** Queensland Rail maintains a database of disability sector organisations and individual customers with a disability who wish to be notified about upcoming track closures, planned lift maintenance and changes to station access. This dedicated communication channel aims to ensure customers are aware of alternative access options that are available to assist them in completing their journey with as little disruption as possible.
- **Sydney Trains / NSW Trains / TfNSW:** Transport for NSW offers customers a range of options for staying up to date with service changes. The Trip Planner allows customers to get real-time service information and save trip information. A range of transport apps also allow for up to date travel information and travel alerts which will include out-of-order lifts and toilets to be accessed. In addition, a database of contacts in the disability sector organisations is maintained. Information regarding service changes or major projects is sent to these groups on a regular basis.
- **V/Line:** V/Line distributes a quarterly Accessibility-specific Newsletter
- **Yarra Trams:** All members of Yarra Trams Accessibility Reference Group are on the distribution list that receives notification of any upcoming planned disruptions and occupations. During planned disruptions and special events, accessible tram journey options are also advertised on passenger communications including our website.

Passenger announcements

- **DPTI, SA:** in response to requests from peak disability organisations which represent vision impairments in South Australia, stop announcements on trams now include side exit information as they approach a tram stop. For example, “The next stop is South Terrace. Exit on the left in the direction of travel”.
- **MTM:** Automated announcement technology is available on all MTM trains. A remote announcement system allows the Customer Control Centre to give announcements to specific lines or singular trains. In addition, stations are fitted with automated announcements as well as the ability for staff manual announcements. Where possible, staff announcers are available on platform to provide additional assistance.
- **PTAWA:** Transwa provides public announcements and signage indicating coach departure and arrival points. Transperth provide audio announcements via the long line public address system at train stations provide timely arrival and departure information.

- **PTV:** is continuing to roll out across the network Passenger Information Displays, and keeping passengers informed through automated and manual announcements.
- **Queensland Rail:** Queensland Rail train crew announce the station the train has arrived and which side the platform is based on direction of travel. There are assisted boarding areas on each platform identified by a blue and white symbol for accessibility at any Citytrain station.
- **Sydney Trains / NSW Trains / TfNSW:** Transport for NSW invests in training on board staff in making clear announcements on services through its “radio school” program. In addition, through procurement of new trains such as the Waratah fleet, automated audio announcements and visual customer information is now available which at some locations includes side exit information.
- **V/Line:** V/Line has put in place programs for professional announcement training to ensure that all announcements meet accessibility requirements, including through signposting important messages from announcements and repeating messages to passengers.
- **Yarra Trams:** The Vehicle Passenger Information System fitted to 74% of trams announces when the ‘right side’ tram doors will be opening. Historically tram doors have always opened on the left, however with the introduction of centre island platform stops, trams are increasingly opening the right-side doors.

Operator Accessibility Plans

- **MTM:** MTM Accessibility Action Plan 2015-2018 will expire at the end of this year, at which time a new action plan will be released. Consultation with key groups has already taken place to inform the priorities of the plan.
- **PTAWA:** The PTA’s Disability Access and Inclusion Plan 2017-2022 is available on both the PTA and the Australian Human Rights Commission websites.
- **PTV:** All operators, under their operating agreements, are required to submit to PTV annual reports tracking their progress towards their accessibility targets and success measures, and to bring forward proposals to improve the provision of accessible services and their strategies for compliance. The metropolitan rail and tram refranchising contracts, in place for almost a year now, have implemented a tighter management and performance regime for operators, and have had operators submit implementation plans for their Accessibility Action Plans. As a requirement of their operating agreements, Victorian operators and the ticketing service provider have all developed Accessibility Action Plans and report annually to PTV on implementation of and progress against these plans, tracking progress against goals and KPIs.
- **Queensland Rail:** Queensland Rail is currently updating its Accessibility strategy and action plan.
- **Sydney Trains / NSW Trains / TfNSW:** The Transport for NSW Disability Inclusion Action Plan 2018-2022 includes more than 160 new actions to reduce transport disadvantage ranging from journey planning, to staff training, customer services and the interaction between transport modes. As part of the plan, programs such as the Transport Access Program will continue to upgrade railway stations in order to become fully accessible. This is building on the success of the previous plan which resulted in 165 railway stations becoming fully accessible.
- **V/Line:** V/Line’s Accessibility Action Plan 2015-18 outlines the priorities of the organisation to support accessibility improvements. This plan is due to expire at the end of 2018, with a new action plan to be released.
- **Yarra Trams:** Yarra Trams Accessibility Action Plan 2015-2018 will expire at the end of 2018, at which time a new action plan will be released. The new action plan will have four key priority areas: Improve passenger support along the 7 steps of the journey; Strongly engage with stakeholders and the community; Deliver increased access to stops and trams; and Advise and report to the state.

Improved disruption management

- **MTM:** MTM has developed Good Practice Guidelines for Accessibility during Disruption. This document outlines considerations such as temporary stops, alternative transport, staff availability and communication.
- **PTAWA:** The PTA provides direct information dissemination via My Alert and Accessibility Bulletins, including any disruption to services. The PTA has also improved access for people with disability, in the event a lift is 'not in service' at a train station or bus interchange by:
 - o providing consistent signage outside the lift,
 - o notifying passengers via;
 - o providing an emergency call button inside the lift which connects to the Central Monitoring Room;
 - o allowing passengers to travel by train to an alternate station (in reasonable proximity), at no further cost, if their desired destination station has interim works affecting accessibility, arranging for passengers to travel by taxi from the station to an agreed destination at no further cost, if their desired station has interim works affecting accessibility.
- **PTV:** PTV is working with the operators and Transport for Victoria to ensure disruptions are managed effectively and ensure that accessibility is a key consideration. PTV is supporting work to develop a code of best practice. Wherever an accessible replacement transport option is not available (due to the level of demand and shortages), alternative equivalent accessible transport is provided to passengers with accessibility needs.
- **Queensland Rail:** Queensland Rail is currently reviewing disruption handling and communication to all customers.
- **Sydney Trains / NSW Trains / TfNSW:** Through the development of new transport apps, Transport for NSW is ensuring that people with disability have the same access to real-time travel information as other customers. For example, transport apps are now able to be used with screen readers. In addition, through the Service Alerts project, service disruption alerts are available via push notifications through Twitter and Facebook.
- **V/Line:** V/Line has disruption management procedures for supporting accessible customers. Disruption procedures are regularly reviewed and updated for improvement. V/Line has improved its disruptions management processes with accessibility customers in mind.
- **Yarra Trams:** Yarra Trams has a diversions book for the Operations Centre to improve passenger focus when planning for/managing disruptions. Tram replacement bus services are run by low-floor buses where possible and tram/bus interchanges occur at level access stops. For major planned disruptions as well as low-floor buses, an accessible minivan service is available from 7am to 7pm. Outside of minivan operation times, accessible taxis are available for customers on demand at Yarra Trams cost.

Data

- **PTV:** utilises a database, Xivic which was developed by Adapt Solutions and contains Train Station Audit Data as a base line set of compliance data. Xivic enables operators to extract and update information regarding the accessibility status of railway stations to report against compliance, plan upgrade works and inform customers about station accessible facilities.
- **MTM:** Partners with PTV in the maintenance of the Xivic database.
- **PTAWA:** is working on the next generation Transperth app which will allow commuters to track their buses in real time. A trial by about 5,000 users is currently underway which will allow passengers to manage their SmartRider account, travel alerts, Smart Parker and bike shelter access, as well as reporting damage to bus stops.
- **PTV:** utilises a database, Xivic which was developed by Adapt Solutions and contains Train Station Audit Data as a base line set of compliance data. Xivic enables operators to extract and update information regarding the accessibility status of railway stations to report against compliance, plan upgrade works and inform customers about station accessible facilities.

- **V/Line:** V/Line supports the management of data held by PTV.
- **Yarra Trams:** Like PTV, Yarra Trams uses the Xivic database to store information about the accessibility status of tram stops.