

**Road Safety Policy and Transport Standards Section
Land Transport Policy and Safety Branch
Department of Infrastructure, Regional Development and Cities
GPO Box 594
CANBERRA ACT 2601**

Dear Disability Access Transport Secretariat

Re: Public Transport Access Committee submission to the Third Review of the Disability Standards for Accessible Public Transport (DSAPT)

The Public Transport Access Committee (PTAC) would like to thank the Department for the opportunity to provide feedback on the Third DSAPT Review.

PTAC provides independent strategic advice to Public Transport Victoria and the Minister for Public Transport in Victoria about issues affecting transport accessibility. This includes:

- Identifying current, emerging and/or potential public transport accessibility issues likely to affect people with disability or with mobility impairments across Victoria.
- Identifying current, emerging and/or potential public transport accessibility issues likely to result from a growing, more diverse and ageing Victoria.
- Consulting broadly with people with disability or with mobility impairments, relevant organisations and peak bodies, government agencies and the broader community, to identify and investigate transport accessibility issues.
- Providing strategic advice on key public transport projects, initiatives and strategies.
- Investigating any matters relating to public transport accessibility referred by the Minister or PTV.

PTAC members are drawn from across Victoria and all have lived experience of disability or caring for someone with a disability. Members represent a range of marginalised groups, such as older adults and those who are currently or formerly homeless.

This submission focuses on the systemic issues PTAC has identified as key barriers to the success of the Standards as a tool to create equity for transport users with disability. Please note the following key points:

- PTAC sees a lack of measurability as a major barrier. It is not clear to PTAC members which services, information and infrastructure are compliant with DSAPT and which are not. This poses the two following issues:
 - it is not clear whether the timelines of the DSAPT will be achieved or what resources are required to reach full compliance;
 - it remains unclear to members of the public whether accessibility issues are due to lack of compliance with DSAPT or due to inadequate standards within DSAPT.

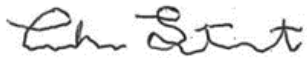
Accordingly, PTAC asks that State Governments and Transport Operators clearly identify which aspects of their jurisdiction are compliant and which are not, in addition to identifying the resources they require to meet the DSAPT. This should include budget and reasonable timelines. PTAC deems this a necessary step in establishing transparency for all parties.

- PTAC identifies the lack of enforceability of the DSAPT as the second major issue. While DSAPT provides direction for Transport Operators to follow to provide accessible services, there are no direct consequences for noncompliance, unless an individual decides to lodge a complaint with the Australian Human Rights Commission. This not only places a significant burden on individuals who experience discrimination within the transport system, but also does not guarantee that outcomes will result in systematic improvement of services. PTAC therefore requests that the mechanism for enforcement of the DSAPT is reviewed, to include penalties for non-compliance.
- PTAC identifies consultation with people with disability as a key component to successfully delivering accessible and inclusive public transport. A testament to the positive outcomes a comprehensive consultation can deliver is provided in the following examples:
 - the consultation, led by PTAC, regarding the design of Victoria's new 65 High Capacity Metro Trains, soon to be rolled out, which resulted in numerous improvements in accessibility (beyond mere compliance). This offers a positive example of the impacts that consultation and community engagement can have on accessibility outcomes. For further information mailto: HCMTProject@ecodev.vic.gov.au
 - the introduction of Changing Places facilities to all five new underground stations of the Metro Tunnel in Melbourne is a further example where people with disability are bringing innovative solutions to the attention of State government decision makers, to ensure equity and accessibility for people with disability is prioritised.
- PTAC notes the continuing divide between quality and reliability of services in metropolitan and regional areas. Australians, including Victorians, living in regional areas are reliant on infrequent, inaccessible services with fewer, if any, alternatives. The geographical spread of PTAC members and their networks enable the Committee to effectively highlight this matter in Victoria.
- Finally, PTAC suggests that the review considers options to identify within the DSAPT best practise examples of access and inclusion for people with disability in the transport system across Australia. This information should be made available to State, Territory and Federal Governments; transport operators and people with disability. This will ensure new projects and major upgrades will build upon best practice examples without needing to start from scratch. PTAC identifies the following two examples of best practice:
 - the development of Victoria's Vertical Access Guidelines
 - the draft of the Universal Access Investment Strategy.

For further information on these you may contact Public Transport Victoria's Inclusive Public Transport Unit.

PTAC would like to voice our support for the Australian Federation of Disability Organisations' (AFDO) position regarding necessary improvements of the DSAPT and transport accessibility, as outlined in the attached here letter.

Kind Regards,

A handwritten signature in black ink, appearing to read "Chris Stewart". The signature is written in a cursive, slightly slanted style.

Chris Stewart

Chair, Public Transport Access Committee