

Submission to:



Third Review of the Disability Standards for Accessible Public Transport

Department of Planning, Transport & Infrastructure
South Australia



For submission to:

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Date: October 2018

Contents

FOREWORD.....	3
INTRODUCTION	3
DISCUSSION.....	5
SOUTH AUSTRALIAN PUBLIC TRANSPORT SYSTEM	6
DEPARTMENT OF PLANNING, TRANSPORT AND INFRASTRUCTURE.....	7
1. Have you been able to meet the 2017 Transport Standards legislated targets? If not, can you elaborate on the reasons for not being able to meet these targets?	7
2. Are there requirements that have proven to be impractical or difficult to implement? If so, please specify these.	8
3. Can you provide detail of any initiatives and actions you have undertaken, not currently detailed under the Transport Standards or other legislative requirements, in relation to removing discrimination against people with disability?	8
STATE GOVERNMENT RESPONSE	10
1. Has the accessibility of public transport within your jurisdiction improved since the last review commenced in 2012?	10
2. Are there requirements that have proven to be impractical or difficult to implement? If so, please specify these.	13
3. Can you provide detail of any initiatives and actions you have undertaken, not currently detailed under the Transport Standards or other legislative requirements, in relation to removing discrimination against people with difficulty?	14
CONCLUSION.....	14
RECOMMENDATION.....	14

FOREWORD

The South Australian Government is committed to the provision of safe, accessible and inclusive public transport for the use of the South Australian community and visitors to the state. Through the Department of Planning, Transport and Infrastructure (DPTI), the Government provides a modern public transport system that strives for substantial community and environmental benefits with a strong and evident commitment to the purpose and application of the *Disability Standards for Accessible Public Transport, 2002* (Transport Standards – attached).

The South Australian Government, is committed to service upgrades, new projects and innovative design that continue to improve facilities and services and incorporate accessible infrastructure and public transport. With this commitment, the Government supports and aims to address discrimination for all people accessing the public transport system in South Australia, so far as reasonably practical.

In 2018, the Liberal Government committed to the establishment of the South Australian Public Transport Authority (SAPTA), to create a more customer-centric public transport system by reviewing operations and developing improvements to services. The introduction of SAPTA will seek improvements in the accessibility and inclusivity of the network with a focus on customer satisfaction.

This review process is appreciated by Governments and transport providers. It enables an opportunity to report on progress and identify inconsistencies within the Transport Standards, with a specific focus on improving accessibility for people with disability to an essential government provided service.



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INTRODUCTION

On 17 December 2017, the Commonwealth Government commenced its five yearly review of Transport Standards with the release of the Terms of Reference. The Department of Infrastructure, Regional Development and Cities identified the scope of this review to include:

- Reporting public views on progress toward achievements of targets set out in the Transport Standards;
- Assessing compliance with the requirements set out in Schedule 1 of the Transport Standards, in particular those under Part 3 of Schedule 1;
- Identifying initiatives and actions with respect to removing discrimination from public transport services undertaken by state and territory governments since the 2012 review; and
- Assessing the progress of the implementation of the response to the 2012 review.

The first and second reviews of the Transport Standards, conducted in 2007 and 2012, saw many recommendations concentrating on several areas of influence. These included;

- The establishment of a national framework to report on progress of compliance by states and territories;
- Government commissioned research into passenger safety of people on mobility devices travelling on public transport;
- Updating and modernising the Transport Standards; and
- The development and implementation of a national mobility device labelling scheme.

At the time of the third review, many recommendations made in the 2012 review are yet to be completed. Of importance to the current review, the modernisation process as recommended in 2012, is being undertaken. Through a national group of industry representatives the Transport Standards are being assessed and revised for practicality and efficacy. However, due to its current rate of progress there are industry concerns that it may not be completed before the compliance target dates set for 2022.

The focus for the South Australian Government in the provision of public transport is upon improving accessibility and removing discrimination. DPTI is committed to achieving full accessibility across the public transport network with all future works continuing to have a significant impact on improving access for all. It is the focus of this submission however, that the emphasis should be on ensuring that all consumers can access public transport and that innovative thinking and responses go beyond compliance to ensure 'whole of journey' accessibility.

DISCUSSION

State and territory governments have made a concerted effort to improve the accessibility of their public transport systems. This submission notes that this continues to be the case. The South Australian Government is committed to developing and delivering effective public policy that promotes participation and creates an inclusive society. To achieve this, the provision of a fully accessible public transport system that improves the lives of all South Australians, is imperative.

This submission will address the third review of the Transport Standards and issues identified by the federal Department of Infrastructure, Regional Development and Cities. This submission will respond to sections identified in the issues paper relevant to:

- DPTI as ‘operators and providers: Compliance against Schedule 1 of the Transport Standards’; and
- South Australian Government as ‘State and territory governments: Actions and initiatives’.

It is important to note that the Transport Standards guiding principles are to:

- Eliminate discrimination against people with disabilities as much as possible;
- Ensure that people with disabilities have the same rights as everyone else in the community; and
- Promote recognition and acceptance within the community of people with disabilities and their rights.

With these guiding principles in mind, the following submission focuses on improving accessibility to ensure people with disability can effectively access their community, above the need to ensure specific compliance with the Transport Standards.

SOUTH AUSTRALIAN PUBLIC TRANSPORT SYSTEM

Currently, the South Australian public transport system consists of train, tram and bus networks that extend across metropolitan Adelaide and into regional and rural areas. Accessible taxis are regulated through DPTI with the monitoring of schemes that provide reduced rates and vouchers for people with disability to access travel.

The Safety and Services Division within DPTI is responsible for the operations and maintenance of trains and trams in accordance with the requirements of Rail Safety National Law and overseeing the operation of the bus network through private sector bus operators.

In South Australia (SA), the public transport network operates over 9,500 bus services, 580 scheduled train services and 420 tram services. During 2017/18 there were 61,773,980 initial boardings across the network (75,029,174 total boardings including transfers) with patrons using public transport to access work, school, and other essential and community services. On average these patrons utilise the buses 68% of the time, the trains 19% and the trams 13%.

The Adelaide Metro fleet currently consists of approximately 1000 buses, 92 rail cars and 24 trams delivering public transport services across South Australia. Electrification of the train network has seen the introduction of new electric rail cars and a cleaner, quieter and more user friendly network. In addition, new stations and upgrades to services and infrastructure has seen an improvement in accessibility at many train stations and tram stops.

DEPARTMENT OF PLANNING, TRANSPORT AND INFRASTRUCTURE

1. Have you been able to meet the 2017 Transport Standards legislated targets? If not, can you elaborate on the reasons for not being able to meet these targets?

Compliance with the target dates as set out in Schedule 1 of the Transport Standards were identified in the 2012 review by all jurisdictions as being exceptionally difficult to meet without significant resourcing. Whilst full compliance with the Standards would be an optimal outcome, DPTI is focussed on ensuring the public transport system is safe, accessible, inclusive, responsive, and that it meets community expectations so far as reasonably practical.

In previous reviews, the difficulties faced by public transport providers in assessing compliance based on the percentage targets set out in the Transport Standards were identified. With the third review offering the opportunity to assess current and future compliance with the targets, ascertaining compliance targets without the assistance of objective measurement tools has continued to be a difficult task. As a result, accurate reporting on the percentage of compliance across the public transport system is problematic to determine and report on.

Since the previous report, DPTI has improved accessibility in the following tangible ways:

- All tram stops, other than City South, are now fully accessible. Re-development of City South is due to commence in late 2019 which will bring the entire tram network, including trams, to full compliance.
- The South Australian train fleet is fully accessible with assisted boarding available at all railway stations to the front carriage of conveyances via ramp deployment. Work is continually being completed to upgrade stations or to install raised boarding platforms that align with the front carriage door to reduce the gradient of the ramp and vertical gap, and in many situations allow independent boarding for people who use mobility devices. This is difficult to achieve in some locations such as those legacy stations situated on curves along the track.
- 47 of the 88 railway stations are compliant, DPTI continues to upgrade railway stations on an “as needs” basis as well as through targeted funding. Recently infrastructure upgrades in the inner western suburbs has seen the rebuild of several stations and grade separation or activation of a number of railway crossings. Work continues across the network in other areas such as electrification of lines and redevelopment and upgrade of other metropolitan stations.
- Due to vehicle turnover DPTI is regularly increasing the number of buses that are considered accessible. Currently the South Australian bus fleet exceeds the 2017 target

of 80% in terms of access paths, ramps, boarding, allocated spaces and doorways and doors. DPTI are scheduled to have a fully accessible fleet by 2022.

2. *Are there requirements that have proven to be impractical or difficult to implement? If so, please specify these.*

As identified above there is a need for clear and uniform understanding of what constitutes compliance, with this being a significant hurdle in determining how jurisdictions are to meet those targets.

Whilst DPTI seeks to improve and support full accessibility of all public transport systems there are, and continues to be, impracticalities and difficulties in achieving this objective. Many of these issues have previously been reported in reviews and are discussed across jurisdictions and providers. For example, in some circumstances closure of stations may be considered where the cost of full compliance with the standards is grossly disproportionate to the community benefits for very low patronage stations.

As previously reported in Transport Standard reviews, issues still remain relevant to the horizontal and vertical gaps for trains and trams and their platforms. This is an ongoing discussion across the public transport industry, and as a result of those difficulties faced by providers when trying to reduce or remove the gap, it is a difficult compliance aspect to achieve.

Buses also remain an industry concern when attempting to meet compliance requirements. This is as a result of the width allowable for transport conveyances on roadways which does not allow for the required manoeuvring areas and access to allocated spaces within the conveyance.

3. *Can you provide detail of any initiatives and actions you have undertaken, not currently detailed under the Transport Standards or other legislative requirements, in relation to removing discrimination against people with disability?*

DPTI is committed to improving access and inclusion across all areas of service delivery, particularly in the provision of public transport and infrastructure. A Disability Access and Inclusion Committee, made up of service and consumer representatives with lived experience of disability, provide guidance and advice to DPTI regarding any relevant topic or concern. This initiative has been revamped in 2018, and is currently going through a change process 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.

In 2018, DPTI completed a process of improving and updating the Vision Impaired Persons (VIP) Travel Card for consumers in SA. Previously a card had been provided to VIP passengers which identified them as a VIP traveller and required them to show the card to public transport drivers on entry to a conveyance, or to authorised officers when requested to provide proof to support their free travel. In late 2017 a complaint was received from consumers who were vision impaired but still able to swipe a card on a validating machine. The complaint outlined that some consumers who had no physical visible cues of their disability, such as an assistance animal or white cane, felt uncomfortable and discriminated against by other passengers on transport services, such as trams, where they were only required to show the card to an authorised officer if requested. As a result, DPTI produced a new VIP travel pass that was printed onto the rear of a special pass MetroCard which the user can now either swipe on a validation machine or show to an authorised officer or public transport driver, whichever is the most appropriate outcome for them. This travel pass was produced following consultation with the Disability Access and Inclusion Committee and then relevant information to obtain the card was provided to all registered VIP passengers.

In response to requests from peak disability organisations that represent people with 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” which informs vision impaired customers which side of the vehicle to correctly alight, allowing them to prepare prior to stopping and avoiding potential embarrassment.

DPTI is committed to the pursuit of a discrimination free public transport environment. Customer Relations staff respond promptly to complaints relevant to disability discrimination, with support from the Disability Discrimination Unit, Technical Services, and make every attempt to immediately address any relevant concerns and issues. Training of staff in addressing disability discrimination and appropriate customer service skills is ongoing and an inherent aspect of service delivery, especially for staff with direct customer contact. Ensuring DPTI staff understand the department’s focus on inclusive and accessible public transport is essential to the organisations service delivery approaches.

STATE GOVERNMENT RESPONSE

1. Has the accessibility of public transport within your jurisdiction improved since the last review commenced in 2012?

In South Australia, 1 in 5 people self-report as living with a disability, with 90% of these people reporting a limitation or restriction that impacted on them performing core activities such as mobility or communication, or restricting them from participating in education or employment¹. The South Australian Government understands that accessible public transport plays a significant role in promoting and preserving the quality of life for many individuals, importantly for those people with disability who rely on it to access their community and increase their social connections.

In 2018 the South Australian Government enacted the *Disability Inclusion Act, 2018*, the focus of which is to promote the full inclusion of people with disability within their community. The legislation aims to assist people with disability achieve their full potential as equal citizens and to improve access to mainstream services. In addition, the Act provides responsibilities for State Government agencies to commit to improving accessibility and inclusion through the delivery of Disability Access and Inclusion Plans. Through this legislation and the requirements within the *Disability Discrimination Act*, the *Transport Standards* and the *Premises Standards*, the South Australian Government is committed to improving accessibility to community for all residents and visitors to the State. This includes the delivery of a fully accessible public transport system that promotes and supports inclusion in community for all.

Over the past five years there have been significant improvements in accessibility to the public transport system, and DPTI continues to work towards providing fully accessible infrastructure, conveyances and information. This includes a significant increase in the number of services available, for example, tram services were 240 services per day in 2012 to 420 available currently. The increase in services assists in improving accessibility for the community as do the individual items listed in response to the questions below.

¹ <https://dhs.sa.gov.au/agencies/disability-sa/disability-access-and-inclusion-plans/south-australians-living-with-disability>

How has accessibility of conveyances (for example, trains, buses and coaches, trams, ferried, wheelchair accessible taxis and aircraft) changed? Have compliance targets been met? Can you provide examples? If compliance targets have not been met, can you elaborate on the reasons for not being able to meet these targets?

Whilst the levels of targeted compliance is difficult to measure, it is considered that the South Australian public transport system is predominately accessible to people with disability requiring to move in their community. The following conveyance types are provided as part of the public transport system in SA, and their accessibility measures are outlined.

Buses - Buses in the Adelaide Metro Fleet are currently achieving 92% accessibility, and DPTI expect that 100% of buses in the fleet will be accessible by December 2022.

Service contracts for regional transport services requires that vehicles must be fully accessible with space for at least one mobility device on board.

Trams - The South Australian tram fleet is 100% accessible. Each conveyance has ramps available for deployment for assisted boarding where required, and include allocated spaces within each conveyance.

Trains – The past few years has seen extensive upgrading of the train network with the increase of electric lines continuing across the metropolitan area. All current rolling stock feature fully accessible carriages with allocated spaces on board and access ramps available for assisted boarding where required.

It is impractical to fully comply with the access path and manoeuvring area requirements connected to the allocated spaces for buses due to the width restrictions of vehicles under the Australian Road Rules. However, DPTI consider buses accessible where mobility devices can achieve assisted or self-boarding and complete their journey.

How has accessibility of information (for example maps, timetables, announcements) changed? Can you provide examples?

DPTI introduced the MetroMate App in 2016 that provides real time, up-to-date public transport information. The App is accessible and provides disruption alerts and journey voice notifications to passengers informing them when to get off a conveyance at their selected stop.

As advised earlier, DPTI completed a revamp of the VIP travel pass for use by people who wanted to validate on entrance to a conveyance. This has improved accessibility for people with vision impairment.

In 2016, DPTI updated information available on the website relevant to priority seating and allocated spaces². At a similar time work was completed to increase the numbers of stop buttons on Flexity trams in response to passenger concerns and to give more accessibility to all travellers.

In 2017/18 financial year, DPTI approved works to complete hearing augmentation at bus stops along Grenfell Street in the City of Adelaide and the works will be completed this financial year.

DPTI communications team and Disability Discrimination Unit provide ongoing assistance and advice across the department to support compliance with a minimum of Level AA standard as per the Website Content Accessibility Guidelines.

How has accessibility of infrastructure (for example, any structure or facility that is used by passengers in conjunction with travelling on a public transport service) changed? Can you provide examples?

Tram stops – With a currently fully accessible fleet, only one tram stop across the expanded network is not accessible. The City South tram stop, is in the first stage of the development process to undergo an upgrade. The latest development will result in all tram stops across the tram network being fully accessible.

Train stations – Across the metropolitan train network, DPTI is consistently working towards compliant stations, pedestrian access points, and related rail infrastructure such as car parks. The cost associated with full upgrades of all infrastructure, particularly where stations have historical aspects, is extremely high. When determining priority for funding, the interests of all public transport users are considered. This ensures that funds available each year are allocated to projects that will provide the greatest benefit to the whole community. Where upgrades are completed or new stations are built, full compliance is met by DPTI in the development and construction of the infrastructure. Where difficulties arise, alternative approaches are presented to the Disability Access and Inclusion Committee for advice and guidance on appropriate outcomes. Where new infrastructure involves upgrades to rail crossings, DPTI will try to achieve grade separation, or where not possible, passive rail pedestrian crossings are upgraded and activated. The past five years has seen many crossing upgrades and stations/infrastructure improvements, all of which were guided through design and construction by the *Transport and the Premises Standards*.

2

<https://adelaidemetro.com.au/content/download/565644/2995180/version/1/file/Final+Priority+seating+factsheet+-+with+images.pdf>

Have you been able to improve the collection and reporting of reliable, current data on public transport accessibility within your jurisdiction?

The South Australian Government, through DPTI, collect extensive data relevant to customer experience on public transport. This is completed via a customer relationship management tool that is used by service providers and Adelaide Metro Information Centre staff. In addition, DPTI collects data relevant to ramp deployment and assisted access of conveyances across the networks that reports on station, service date and time.

One difficulty that arises in collating accurate data relevant to public transport accessibility stems from the difficulty in collecting data on the patronage of people with disability using public transport and accordingly respond or improve access. There is no requirement for people with a disability, who are able to access public transport unassisted, to identify that they are using the service, consequently patronage data only includes where assisted boarding occurs. In addition, with the Government's commitment to providing free travel to people who are legally blind and vision impaired, this data is not recorded and patronage numbers are unknown. Whilst the number of VIP cards issued is available, the actual patronage and which type of public transport used, is not. This will be improved slightly with the recent changes to the VIP card, as some VIP travellers can now validate their cards, which will result in recording of patrons who use the network. Seniors Card holders are entitled to free transport during off peak times however this information is not recorded.

DPTI relies upon customer feedback and reporting of consumer difficulties or issues through forums including:

- Participation in events including International Day of People with Disability and the Disability and Ageing Expo;
- Customer Service Team and customer complaints;
- Staff reporting of issues and incidents; and
- Intergovernmental relationships with Disability Policy Unit and Disability Services.

2. Are there requirements that have proven to be impractical or difficult to implement? If so, please specify these.

Please see responses to Question 2 above.

3. Can you provide detail of any initiatives and actions you have undertaken, not currently detailed under the Transport Standards or other legislative requirements, in relation to removing discrimination against people with difficulty?

Please see responses to Question 3 above.

CONCLUSION

The South Australian Government is committed to providing an inclusive approach to the delivery of all public transport services and the design of new and innovative infrastructure that is accessible for all. This was supported in 2018 with the introduction of the *Disability Inclusion Act*, which will see the development of a State Disability Access and Inclusion Plan and aligned Disability Access and Inclusion Plans for each State Authority. The Act has been introduced to promote full inclusion in the community of people with disability and to assist them to achieve their full potential as equal citizens.

Through this legislation the Government seeks to continue improving mainstream services and supports for accessibility of people with disability and to align with the National Disability Insurance Scheme and other focussed strategies to ensure an accessible and inclusive community for all.

RECOMMENDATION

It is the recommendation of this submission, to assist in ensuring clarity and consistency across all jurisdictions in the application of the Standards, that the Federal and State Governments work together to produce a national framework to support all jurisdictions to report and record progress against the Transport Standards. This process must consider the impracticalities of full compliance and focus on achieving accessible public transport that facilitates and completes a person's journey, rather than enforcing strict compliance for the sake of compliance.