

2012 Review of the Disability Standards for Accessible Public Transport 2002

Submission

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Introduction

Purpose of Submission

In 2012 the second review of the *Disability Standards for Accessible Public Transport 2002* (Transport Standards) was announced and organisations were invited to make submissions to the review and respond to a number of questions. State and territory governments were requested to provide information on initiatives and actions undertaken within their jurisdiction that aim to eliminate discrimination against people with disability in relation to their use of public transport services.

This submission will respond to the questions for state and territory governments outlined in the *2012 Review of the Disability Standards for Accessible Public Transport 2002 (Transport Standards) Issues Paper*. Specifically the submission will provide Department of Transport and Main Roads' (TMR) input on the achievements undertaken within Queensland across the last five years, present the results of an audit of achievement against the 2012 compliance milestones outlined in the Transport Standards, and submit other relevant information and suggestions for consideration as part of the review process.

Queensland Passenger Transport System

TMR's vision is 'Connecting Queensland' with the key purpose to 'plan, deliver and manage a transport system that connects Queensland'. Public transport services improve the lives of Queenslanders by connecting them with each other, and to opportunities, by removing the barriers to access and mobility.

It is TMR's intention to offer a high quality passenger transport system through the facilitation of services provided by private bus, coach, ferry and regional air service operators, local governments, Queensland Rail Transit Authority and the taxi industry.

Between 1 July 2008 and 31 December 2012, public transport in south-east Queensland was managed by the TransLink Transit Authority (TTA). The remainder of Queensland's public transport network was managed by TMR. As of 1 January 2013 the TTA ceased to exist and responsibility for the south-east Queensland and regional Queensland public transport network now sits with the TransLink Division of TMR.

Mass-transit services are provided in south-east Queensland to cater for the high density population. The south-east Queensland network, otherwise known as the TransLink network, integrates public transport services and provides integrated ticketing options. In regional Queensland, urban bus and some other passenger transport services are provided under the *qconnect* banner. *qconnect* is a Queensland Government initiative introduced in 2007 which has delivered improved public transport services and greater connectivity and accessibility of services throughout regional, rural and remote Queensland.

Through the TransLink Division, TMR develops policies for efficient, sustainable and flexible transport services that remove the barriers to access to passenger transport services. The Division also works with a local government-owned transport operator, private bus, coach, ferry and regional air operators and taxi companies in the provision of passenger transport services to members of the public.

During the period 2007-08 to 2012-13, TMR (including the former TTA) invested in excess of \$2.8 billion to improve Queensland's public transport system through the upgrading of conveyances and public transport infrastructure. Funding was either provided to contracted operators and certain local governments, or used to upgrade state government owned public transport infrastructure. Consequently, this funding has enabled a significant enhancement to the accessibility of public transport for people with disability since the last review of the Transport Standards.

There are a number of private operators that offer services outside of the government contracted framework in Queensland. Information about the compliance of these operators with the Transport Standards has not been included in this submission.

Queensland's statistics

- Over 1,730,000 square kilometres (km) in size
- 7,400 km of coastline, 13,350 km including islands

- Over 4.5 million residents

Snapshot of Queensland's Passenger Transport System

- 4,888 accredited transport operators
- Over 48,000 authorised drivers of public transport
- 33 performance-based urban bus contracts
- Approximately 1,200 school bus contracts
- 23 taxi service contracts
- 3,261 licensed taxis
- 3 air service contracts
- 8 long distance coach contracts
- Queensland Rail Transit Authority contracted to provide passenger rail services

2012 Transport Standards Milestones - Compliance Audit

Individual operators are responsible for the compliance of their conveyances with the Transport Standards and as such also hold the risk for non-compliance. TMR however includes in service contracts the requirement for operators to comply with all relevant legislation, including the Transport Standards. In addition TMR provides various forms of funding to assist operators to comply with the Transport Standards.

To measure the level of compliance of TMR's contracted operators against the 31 December 2012 compliance targets and inform TMR's response to the 2012 review, government contracted operators were requested to complete a self-audit of conveyances.

TMR wrote to all government contracted urban bus, long distance coach, and regional ferry operators and taxi booking companies seeking data on their level of compliance for conveyances. Audit tools were provided to assist operators in compiling this information.

The response rate for the audit varied between conveyance mode, with a 50% response rate for bus and coach; an 80% response rate for regional ferries and an 80% response rate for taxis. It is believed the responses received from operators provide a good indication of overall compliance levels throughout Queensland. The resulting response rate to this audit was a marked improvement to the response rate received when a previous audit was undertaken for the 2007 review of the Transport Standards. Information from TMR's contracted air services was requested separately through a contract review process during 2012.

It is understood that the Queensland Rail Transit Authority will be providing a separate submission to the 2012 review and that any discussion on compliance with Transport Standards milestones for rail may be presented in its submission. Therefore, no rail compliance data has been included in this submission.

Additional information on infrastructure compliance was held internally by TMR as providers of the infrastructure, such as major bus stations and park 'n' ride facilities. The level of compliance for bus stops was estimated based on the amount of funding provided by TMR to local governments to upgrade bus stops in accordance with the Transport Standards.

Limitations of the data arising from the Compliance Audit

The interpretation of the data from the compliance audit needs to be undertaken with consideration to a number of constraints surrounding the data collection process:

- The compliance audit tool was completed by operators/providers on a self reported basis. As such, TMR has assumed that the information provided is correct and that the questions within the audit tool have been understood and responded to correctly. It is unknown if people completing the self-audit had knowledge of the technical requirements outlined in the Transport Standards. TMR is unable to independently verify this information.
- The survey of air operators' compliance was based on a different survey tool and was undertaken

at a different point in time and by a different area of TMR than was the case for the other surveys.

- The compliance tool was only sent to TMR contracted operators and therefore, generally, the compliance results of other types of operators are not included in this data. Some non-contracted operators did respond to the request for information in reply to communications from their industry groups, but this was not the case for all non TMR contracted operators.
- Some of the questions on the audit tools were not responded to by operators/providers and therefore within the data set there are a number of “No Response” entries.
- Some data was unable to be sought through the audit process and these elements were coded as “No Data Available”.
- For some parts of the Transport Standards (e.g. toilets) the inclusion of the element is not mandatory, but if it is installed it must be compliant with the Transport Standards. Where none of these elements have been installed, it has been indicated so within the data tables.

Specific considerations or limitations relating to a compliance result have been highlighted within the table.

Compliance Audit Results

A summary of compliance levels with the 2012 Transport Standards milestones for conveyances are outlined in Table 1. Information on the compliance with the 2012 Transport Standards milestones for infrastructure (park ‘n’ rides, ferry infrastructure and bus stations) is contained in Table 2.

TMR did not request reasons from operators as to why they have not met targets in the Transport Standards and is therefore unable to provide any information relating to this.

Table 1: Compliance Audit Results for Conveyances

Standard		Conveyances					
		Bus	Coach	Ferry (*)	Taxis	Taxis - WCA	Air (#)
Fleet Size	2012 Target	1772	161	12	2859	536	
Part 2 - Access Paths	55%	85%		100%			55%
Part 3 - Manoeuvring Areas	55%	85%		100%			55%
Part 4 - Passing Areas	55%			83%			
Part 6 - Ramps	55%	85%		92%			NR
Part 8 - Boarding	55%	85%	31%	83%			55%
Part 9 - Allocated Space	55%	85%	31%	92%		92%	55%
Part 10 - Surfaces	100%	97%	55%	100%			
Part 11 - Handrails and Grabrails	100%	76%	67%	67%			100%
Part 12 - Doorways and Doors	55%	76%	64%	92%		92%	55%
Part 14 - Stairs	55%	84%	31%	58%			55%
Part 15 - Toilets	55%		NDA	100%			None Installed
Part 16 - Symbols	100%	30%	36%	50%			NR
Part 17 - Signs	100%	97%	57%	100%	100%		NR
Part 19 - Alarms	100%	78%	None Installed	58%			None Installed
Part 20 - Lighting	100%	98%	70%	100%			100%
Part 21 - Controls	55%	96%	76%	42%			
Part 25 - Payment of Fares	100%	89%	56%	100%	100%		100%
Part 26 - Hearing Augmentation System	100%	100%	100%	100%			
Part 27 - Information	100%	88%	65%	100%	100%		100%
Part 28 - Booked Services	100%		52%	33%	(d)		100%
Part 29 - Food and Drink Services	100%	(e)	(e)	(e)	(e)	(e)	100%
Part 30 - Belongings	100%		(f)	(f)			100%
Part 31 - Priority	100%	98%		100%			

NR - No Response
NDA - No Data Available

(*) - Ferry results based on self-audit responses received from two regional ferry operators

(#) - Air audit was completed as part of a separate audit. Fleet size was not included and a number of questions were not answered by respondents. No Response (NR) was entered in relevant cells.

(a) - Allocated space on Coaches is not mandatory. Coaches do not have to have an allocated space if each passenger uses a fixed seat.

(b) - Installation of toilets is not mandatory. If installed, they must comply. Of those installed, 100% compliance achieved. Actual installation figures: Ferry - 25%. Part 15 was unintentionally omitted in the audit for Coaches - so no responses received

(c) - Installation of emergency warning systems is not mandatory. If installed, they must comply. None are installed in Coaches.

(d) - Percentage of taxi services meeting equal response times with an accessible taxi varied across the State fleet from 60% to 100% compliance. Generally achieved in smaller cities and not achieved in larger cities.

(e) - Part 29 was omitted for all conveyances except Air.

(f) - Part 30 applies to Aircraft, Coaches, Ferries and Trains. Question was unintentionally omitted from audit for Coach and Ferry - so no responses received.

(g) - Installation of a Public Address System is not mandatory. Of those installed, 100% compliance is achieved. Actual achievement: Bus - 3%, Coach - 45%, Ferry - 42%

	Installation is Non-Mandatory, if installed must comply with relevant Australian Standard
	Not Applicable
	Does not meet 2012 Milestone
	Meets 2012 Milestone or higher

Table 2: Compliance Results for Ferry Infrastructure, SEQ Bus Stations and SEQ Park 'n' Rides

Standard		Infrastructure		
Fleet Size	2012 Target	Ferry (*)	TransLink Bus Stations	TransLink Park n Rides
Part 2 - Access Paths	55%	100%	76%	58%
Part 3 - Manoeuvring Areas	55%	100%	78%	54%
Part 4 - Passing Areas	55%	75%	81%	57%
Part 5 - Resting Points	55%	50%	88%	65%
Part 6 - Ramps	55%	100%	82%	58%
Part 7 - Waiting Areas	55%	75%	82%	67%
Part 8 - Boarding	55%	100%	66%	83%
Part 9 - Allocated Space	55%	100%	NDA	NDA
Part 10 - Surfaces	100%	100%	NDA	NDA
Part 11 - Handrails and Grabrails	100%	100%	84%	80%
Part 12 - Doorways and Doors	55%	50%	86%	100%
Part 13 - Lifts	55%	None Installed	100%	None Installed
Part 14 - Stairs	55%	25%	84%	80%
Part 15 - Toilets	55%	100%	100%	100%
Part 16 - Symbols	100%	75%	76%	54%
Part 17 - Signs	100%	50%	76%	54%
Part 18 - Tactile Ground Surface Indicators	55%	25%	63%	58%
Part 19 - Alarms	100%	None Installed	NDA	NDA
Part 20 - Lighting	100%	100%	69%	56%
Part 21 - Controls	55%	NDA	NDA	NDA
Part 22 - Furniture and Fitments	55%	50%	61%	92%
Part 23 - Street Furniture	55%	None Installed	NDA	NDA
Part 24 - Gateways	100%	50%	NDA	NDA
Part 25 - Payment of Fares	100%	100%	88%	100%
Part 26 - Hearing	100%	100%	33%	None Installed
Part 27 - Information	100%	100%	81%	54%

NDA - No Data Available

(*) - Ferry results based on self-audit responses received from two ferry operators outside of the south-east Queensland network

(a) - Provision of Waiting Areas is not mandatory. If installed, they must comply with Part 7.1 and 7.2.

(b) - Installation of Lifts are not mandatory. If installed, they must comply with AS1735.12 (1999). Of those installed, 100% compliance is achieved. Actual achievement: TransLink Bus Stations 89%

(c) - Installation of toilets is not mandatory. If installed, there must be at least one unisex accessible toilet that complies with AS1428.1 2001, Clause 10. Of those installed, 100% compliance is achieved. Actual achievement: Ferry - 40%, TransLink Bus Stations - 15%, Park n Rides - 5%.

(d) - Installation of Alarms is not mandatory. If installed, they must comply with AS1428.2 (1992).

(e) - Installation of Seats are not mandatory. If installed, they must comply with AS1428.2 (1992) Clause 27.2.

(f) - Installation of a Public Address System is not mandatory. Of those installed, 100% compliance is achieved. Actual achievement: Ferry - 50%, TransLink Bus Stations - 33%

Installation is Non-Mandatory, if installed must comply with relevant Australian Standard

Does not meet 2012 Milestone

Meets 2012 Milestone or higher

Compliance Results for Bus Stops

Local governments own and manage bus stops within the respective local government area and as such are responsible for ensuring they meet the Transport Standards. To assist local governments in meeting the Transport Standards TMR provides funding and empowers local government with the necessary tools and knowledge. It is estimated that based on the amount of funding allocated to local governments in Queensland that overall, approximately 53% of local government owned bus stops should be compliant.

Questions for state and territory governments

Has the accessibility of public transport within your jurisdiction improved since 2007?

1. *How has accessibility to conveyances (eg trains, buses and coaches, trams, ferries, wheelchair accessible taxis and aircraft) changed?*

There have been a number of improvements in the accessibility of government contracted public transport services in Queensland since 2007. A number of programs and policies have been introduced to improve the accessibility of conveyances. Key achievements have been outlined in this section under the different conveyance types.

Bus

All urban buses used in the operation of scheduled passenger services contracted by TMR must comply with the requirements of all applicable Acts, Regulations and Standards, including the Transport Standards.

TMR has a policy that all replacement urban buses are required to be compliant with the Transport Standards. This policy sees continuous improvement in the Transport Standards compliance percentages with the urban bus fleet in Queensland ahead of compliance targets as specified under the Transport Standards.

Until 2011, TMR offered regional bus operators funding under the Accessible Bus Program, which facilitated the modernisation of regional Queensland's urban bus fleet to comply with the Transport Standards. Under the program, TMR funded operators 25% of the total cost (GST exclusive) of the approved purchase price of an accessible vehicle. In addition, TMR provided operators with an 'interest subsidy' of up to 6%, paid quarterly for the life of the loan, which further encouraged operators to purchase new accessible vehicles by easing some of the financial burden.

Capital funding for compliant replacement vehicles is now included as part of the contract mechanism for government contracted bus operators throughout Queensland. The amount of capital funding identified for inclusion in contract payments is dependent on the age of the operator's fleet and when replacement vehicles will be required to ensure the specified maximum fleet age is adhered to. Funding is only provided for vehicles that are compliant with the Transport Standards.

Coach

Since 2007, TMR has provided ongoing funding support towards the delivery and continued operation of 10 accessible long distance coaches through its long distance coach service contracts. In any given week, 18 coaches are required to deliver long-distance coach services in Queensland, meaning 55% of these coaches will be accessible. These accessible long distance coaches ensure regional communities have continued access to essential medical, education, business and social services in larger provincial towns.

Ferry

Since 2007 TMR has provided more than \$1.3m in funding support towards the purchase of three new accessible ferries. These ferries were introduced by Bay Islands Transit and currently service the Southern Moreton Bay Islands.

Brisbane City Council is responsible for ferry services provided along the Brisbane River. The larger vessels are known as CityCats. A staged upgrade is currently underway to bring the CityCat fleet of 19 vessels to full compliance. All pre-2002 CityCats were retrofitted during late 2012 and early 2013 to comply with the Transport Standards. The retrofit of these vessels included provision of six allocated spaces, toilet modifications, manoeuvring areas, hearing augmentation loops and compliant lighting. All post-2002 vessels not compliant with the standards will be retrofitted during 2013.

There are also nine smaller monohull vessels providing ferry services on the Brisbane River. One of these vessels has been retrofitted as part of a trial. Retrofit of the remaining eight in the fleet will be determined as part of a wider vessel review to be undertaken during 2013.

Taxis

In regards to the taxi industry, TMR has introduced a number of initiatives to help improve access to taxi services for people with disability.

- Amendments to regulation

Amendments to the *Transport Operations (Passenger Transport) Regulation 2005* (TOPTR) came into effect in July 2008, which require taxi drivers to be logged on at all times to a taxi booking system and to accept all reasonable fares.

Amendments were made to ensure that drivers of wheelchair accessible taxis (WAT) did not avoid wheelchair jobs by not logging onto a taxi booking system and only taking jobs from taxi ranks; or when they are dispatched by taxi booking companies, refuse to accept the hire.

- Reviewed and updated taxi service licence

In 2008, the terms and conditions that apply to taxi licences were expanded to reflect the requirements of the Transport Standards relating to vehicle, equipment and providing appropriate service to people with disability. All the tender documentation for future tenders was also amended to ensure consistency. The additional requirement for increased head height in conveyances as of 1 January 2013 has also been amended in all applicable documentation.

- Improved wheelchair licence availability

TMR prioritised the release of WAT licences to ensure the level of service provided to the disability sector continued to improve. In April 2008 the percentage of the taxi fleet in Queensland that was accessible was 15.2% (476 WAT licences).

Since this time, of the 200 taxi licences released throughout Queensland, 138 have been WAT licences. The number of WATs in the entire Queensland taxi fleet is now 642 or 19.7%. This is the highest proportion of WATs in a taxi fleet in a state jurisdiction in Australia. TMR continues to prioritise WAT licence releases.

- Single wheelchair people mover

TMR investigated the appropriateness of introducing a people mover vehicle into the taxi fleet capable of transporting only a single wheelchair rather than two. It was considered that such a vehicle would be beneficial in areas where only one or two taxis operate and the use of a dual WAT is unpopular. TMR implemented a policy in March 2009 to allow the use of these vehicles (which were equipped with ramps) in contract areas where the taxi booking company retained the right to allow these vehicles to be used in the fleet or not. In addition, all WAT licence tenders from that point on, were amended to allow the use of a single or dual vehicle, subject to the approval of the taxi booking company.

- Accessible Taxis Queensland

In late 2006, approximately 80 taxi service areas in regional Queensland did not have a WAT as part of the taxi fleet. As a result, the Queensland Government committed \$4.8m to fund the provision of a new or used vehicle to be used as a WAT through the Accessible Taxis Queensland program. A condition of the program was that operators wishing to convert their existing

conventional taxi to a WAT had to have their licence amended to reflect that on a permanent basis and the vehicle had to be operated for a certain number of years or funding would be required to be paid back to the government on a pro rata basis.

In Australia the program was a unique initiative as it was the most comprehensive program dedicated to providing WATs to regional communities. When fully implemented in 2010, wheelchair reliant passengers in 65 of the 80 taxi service areas in regional Queensland had access to a WAT. Since that time however, seven licences have proven to be financially unviable and have been surrendered.

Rail

Rail services are provided by the Queensland Rail Transit Authority which, it is understood, will be providing a submission to the review independently. Any discussion on compliance with Transport Standards milestones for rail conveyances may be presented in that submission.

2. *How has accessibility of information (eg maps, timetables, announcements etc) changed? Can you provide examples?*

Easy access to information about transport services is an essential part of public transport travel. TMR continues to work towards improving the ease of access of information on the public transport network for people with disability. Key initiatives that TMR have undertaken in this area are detailed in this section.

Passenger Information Research Project

In 2009-10, the former TTA conducted a Passenger Information research project. A component of this project included specifically focusing on the end-to-end travel experience and information needs of people with disability. Focus groups included advocacy groups, carers and public transport users with disability.

In-depth ethnographic interviews were also conducted with customers who had mobility, vision, speech or intellectual impairment. The findings of the report are referred to and used on a continuous basis as part of TransLink's information development when new or existing projects are upgraded or implemented.

Website and Contact Centre

The TransLink website is the main portal for people seeking information on the public transport network in south-east Queensland, such as travel options and timetables. In addition to the website there is also a 24-hour contact centre available. The contact centre and website have TTY phone capabilities via the National Relay Service. Speak and Listen (speech-to-speech relay) is also available.

The TransLink website, which includes the go card website, is required to comply with the Commonwealth Department of Finance and Deregulation's *Web Accessibility National Transition Strategy*. Under this strategy all government websites are required to adhere to the *Web Content Accessibility Guidelines* version 2 (WCAG 2.0), developed by The World Wide Web Consortium.

WCAG 2.0 identifies techniques to create and manage web content (i.e. dynamic and static textual, visual, or audio electronic information) in ways that are more accessible to people with disability, for example, through assistive technologies like screen readers. WCAG 2.0 stipulates that content should be perceivable, operable, understandable and robust.

For each website redesign, TMR engages Vision Australia to conduct test sessions with users who have various physical and cognitive disabilities. The redesign also undergoes an expert review with any resulting recommendations incorporated into the final website. The TransLink Division online team periodically review the TransLink website to ensure it is compliant with the required *Web Accessibility National Transition Strategy* standards.

Education Material

Information is included on the TMR website that provides advice on travelling with a wheelchair or mobility scooter and information on the Transport Standards, requirements and supporting guidelines that relate to

the provision of accessible public transport. TMR has also published a range of educational materials including:

1. Wheelchair Accessible Taxi Guide
2. Wheelchairs and Mobility Scooters - A guide for safe travel in Queensland
3. Travelling with your Wheelchair or Mobility Scooter - Public Transport and Registration Requirements
4. Wheelchairs and Mobility Scooters - Public Transport and Registration Requirements for Retailers
5. Information Bulletin - Disability Standards for Accessible Public Transport
6. Important information for public transport operators and providers of infrastructure and premises (developed in collaboration with the Queensland Bus Industry Council).

Due to increasing concerns raised by the bus industry about the safety and carriage of mobility scooters on buses, TMR undertook a broad review and consultation process with the public transport sector, retailers and peak disability groups including:

- Spinal Injuries Association of Queensland
- Disability Council of Queensland
- Council on the Ageing
- Queenslanders with Disability Network
- Queensland Bus Industry Council
- LifeTec Queensland
- Cerebral Palsy League.

The outcome of this review and consultation was TMR's development of the education materials around wheelchairs and mobility scooters. The publications focus on how to safely use public transport (urban buses, trains, ferries and taxis) and to raise awareness about the different travel options for users of wheelchairs and mobility scooters. To ensure a whole-of-transport approach, the publications also include information on registration requirements and advice on the safe use of such devices on roads and footpaths.

At the time that the wheelchairs and mobility scooters documents were developed, TMR mailed out copies to disability organisations, retailers and other key groups as well as TMR's Customer Service Centres. The documents are also available on the TMR website.

Education Sessions

To further educate targeted groups on obtaining information and using the public transport network in south-east Queensland, the former TTA conducted a number of information sessions from the time *go* card was introduced onto the network in 2008 until 2012. These sessions included:

- *Get on Board*: Information sessions conducted with disability service providers and community groups to improve the knowledge, understanding and information of personnel who assisted people with disability to access and use the transport network. Training also included improving their knowledge of and ability to use and navigate TransLink resources such as the Journey Planner, accessible ticketing, and safety and security on the network.
- *go card*: Information sessions were conducted on the application and usage of the *go* card on the transport network for Senior's groups which included people with disability. The aim of the sessions was to increase awareness and knowledge of the *go* card product.

Real-Time Information Pilot

A real-time information pilot, titled Trip Tracker, was implemented by TMR from late July 2012 on 124 Clarks Logan City buses providing services in the Logan City area and 20 Brisbane Transport buses providing services from West End to Teneriffe through the Brisbane CBD, known as Blue CityGlider services. At this time, the current trial of the pilot is now complete and outcomes are in the process of being assessed.

The trial included the provision of on-board electronic passenger information displays with 'next stop' information and audio announcements on all services included in the trial. A total of 14 electronic kerbside information displays are in place at Logan Hyperdome, Springwood, Beenleigh and Logan Central stations, and audio announcements were also available when customers pressed a button at the stop. Real-time stop information was also available online through both the TransLink website and mobile site.

Just prior to the trial period and during the pilot launch, TransLink conducted audio and visual testing of the overall system with customer focus groups to assist in making the pilot of the Trip Tracker more accessible for people with disability. The recommendations provided by the focus groups were given consideration during the Trip Tracker pilot.

Rail Signage

The Rail Signage manual was developed in 2011 by the former TTA in conjunction with the Queensland Rail Transit Authority and outlines the requirements of the Transport Standards relating to signage. The manual has been adopted for all new infrastructure and upgrade works at rail stations. Signage upgrades across most stations will include brail, improved contrast to aid readability and use of international symbols in order to make signs compliant with the Transport Standards.

Each train station has an electronic 'next train' customer information console with directional buttons (inbound to city / outbound from city) with an automated broadcast that will announce the time of the next arriving train and remaining time. Most busy train stations have electronic Passenger Information Displays that show the next six trains to arrive as well as the stopping pattern for the next train. The display has been made easier to read with larger font sizes and colour contrast.

Station maps with boarding points, help phones and hearing loop information to assist people with disability to locate information about train services and board the correct train as easily as possible, are also included on train stations.

The improved various modes of providing information at train stations will enable greater access to required information for people with disability.

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

Since 2007 the Queensland Government has contributed significant resources and funding to upgrade public transport infrastructure throughout Queensland in order to improve accessibility and to assist in meeting the compliance targets in the Transport Standards. This includes bus stop infrastructure, bus stations and interchanges, rail stations, park 'n' rides, ferry terminals, pontoons and jetties. This has involved partnering with local government and establishing funding agreements.

TMR is committed to ensuring all public transport infrastructure work undertaken is in line with the Transport Standards. TransLink Division of TMR is currently updating its Public Transport Infrastructure Manual (PTIM) and developing supporting policies and design guidelines to ensure TMR leads by example in the delivery of accessible infrastructure and also to contribute to developing knowledge and understanding of accessibility requirements with infrastructure delivery partners and the design/construction industry.

Bus

TMR is committed to promoting the need for best practice accessible public transport infrastructure design. As part of TransLink's commitment to continual improvement of network access and safety, the

TransLink Station Upgrade Program (TSUP) aimed to provide bus infrastructure improvements along key corridors and major activity nodes to support the TransLink network in south-east Queensland.

TSUP ensured delivery of bus and park 'n' ride infrastructure aligned with the PTIM to create high quality and accessible facilities with a consistent look and feel. All bus infrastructure delivered through TSUP was designed to comply with the Transport Standards which improves access and safety for customers when using the TransLink network. Since 2007, bus infrastructure delivered, or currently under construction, as part of TSUP includes:

Park 'n' Rides	Bus Stations
Sleeman Centre Park 'n' Ride	University of the Sunshine Coast Station
Greenbank RSL Park 'n' Ride	Logan Central Plaza Station
Park Ridge Park 'n' Ride	North Lakes Station
Kenmore Park 'n' Ride	Loganholme Station
Klumpp Road Park 'n' Ride	Maroochydore Station
Capalaba Park 'n' Ride	Noosa Junction Station
Slacks Creek Park 'n' Ride	Redbank Plaza Station
Jindalee Park 'n' Ride	University of Queensland (UQ) Lakes Station
The Gap Park 'n' Ride	

From 2013, work previously completed under TSUP transitioned to a state-wide Public Transport Facilities Program.

Through the south-east Queensland Bus Stop Upgrade Program (BSUP) and the Regional Disability Discrimination Act Program, TMR is committed to providing financial assistance to local governments to enhance accessibility of bus stops. In 2012-13, BSUP had allocated \$4.5 million for accessible bus stop upgrades and the Regional Disability Discrimination Act Program had a budget of \$1.9m for accessible bus stop and ferry terminal upgrades. This builds on significant funding allocations in previous years for the upgrade of public transport infrastructure throughout Queensland.

During 2009-10, TMR worked with several regional local governments to provide funding for infrastructure with improved accessibility to the facilities. Agreements were also signed with local governments throughout regional Queensland who have advised approximately half of all bus stops were upgraded to be accessible by December 2012.

Since the 2007 review of the Transport Standards was undertaken, TMR has introduced additional major infrastructure onto the south-east Queensland bus network through the construction of four busways. Busways are dedicated roadways that separate buses from general traffic offering commuters a congestion-free trip on fast, frequent and reliable services. Bus stations along south-east Queensland's busways are physically accessible for people with disability.

Ferry

Ferry services on the Brisbane River are provided by the Brisbane City Council. A concerted effort is being made by Brisbane City Council to ensure full compliance of all 24 Brisbane ferry terminals by 2017, with an overall terminal/fleet upgrade program budget of \$53m.

Currently, no Brisbane City Council terminals are strictly compliant due to the requirements for gangways (ramps) to have landings at six metre spacings. If the requirement for landings on ramps is excluded two

Brisbane City Council ferry terminals would be fully compliant and a further seven terminals can be made compliant by replacing the emergency call points.

TMR is investigating the establishment of a consistent emergency call point system across all modes in the south-east Queensland public transport network which will be compliant with the Transport Standards.

A further two terminals will be upgraded during 2014 and a further seven terminals will be upgraded by mid 2015 (including a new terminal at Park Road, Milton). The remaining terminal upgrades will be completed by the end of 2017.

Issues regarding gangway grade at low tide have yet to be resolved. The Brisbane City Council has released a Request for Tender for a feasibility study to investigate whether viable options exist to implement landings on gangways in a tidal environment while remaining flood resilient. All other elements such as tactile indicators, colour contrast, seating, handrails, lighting and signage will be addressed by standardised design. All terminals will be designed to be flood resilient to above 2011 flood levels.

TMR has provided a \$3m grant to the Redlands Regional Council for the upgrade of the Coochiemudlo and Victoria Point ferry terminals. The grant is to ensure that Council brings the terminals up to standard as required for Transport Standard compliance. The major works associated with this project are to occur in the 2013-14 financial year.

In regional Queensland, TMR continues to upgrade jetty infrastructure that supports government subsidised ferry routes. Since 2007, jetties have been upgraded in Moreton Bay, Townsville, Magnetic Island, North Stradbroke Island and various jetties in the Torres Strait.

Rail

In the 2012-13 financial year, TMR provided funding of \$5.8m for improving compliance with the Transport Standards on Citytrain network infrastructure in south-east Queensland. In addition to this \$14.3m was provided for rollingstock and \$33m for station upgrades. While the purpose of this latter funding was not specific to improving compliance with the Transport Standards the upgrades to rollingstock and stations will assist in improving accessibility.

A number of stations have been upgraded or new stations constructed since 2007, with more to be completed by 2016, which will provide greater accessibility to train services for people with disability, as outlined below:

- 12 full upgrades completed since 2007 (Altandi, Runcorn, Fruitgrove, Kuraby, Grovely, Indooroopilly, Darra, Oxley, Beerburum, Elimbah, Fortitude Valley, Ferny Grove)
- Two new stations since 2007 (Richlands, Varsity Lakes)
- Two new stations (Springfield Central and Springfield) and two full station upgrades (Sandgate and Narangba) to be completed in 2013
- Six new stations to be completed in 2016 (Kallangur, Murrumba Downs, Mango Hill, Mango Hill East, Rothwell, Kippa-Ring).

Most stations have been upgraded to include passenger information displays, next train displays, hearing loops, tactiles, signage, toilets, ticket offices, ramps and footpaths. Almost all stations have a designated boarding point for people with disability located close to the station guard. Signage is provided directing people to this location as well as tactile ground surface indicators marking the boarding point. High level platforms assist in easier boarding of trains for people with disability.

Ticketing Equipment

New ticketing equipment was installed during the initial roll out of the *go* card ticketing system in 2008. Add Value Vending Machines (AVVMs) are one method by which customers can top up a *go* card or purchase a paper ticket. AVVMs used on the TransLink network in south-east Queensland are accessible in accordance with the *Americans with Disability Act 1990 Standards for Accessible Design*.

TransLink also offers the ability to top up a *go* card at a station office, through the retail network and online through the TransLink website. Paper tickets can also be purchased at a station office. This provides customers with a range of options to top up *go* cards or purchase paper tickets.

All go card touch on/touch off points at train stations and on conveyances are 100% compliant with the Transport Standards.

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

TMR has implemented a number of initiatives to improve the ongoing collection and reporting of reliable data on the accessibility of public transport in Queensland. Key initiatives are outlined below.

Contracted reporting requirements

TMR has included specific provisions around reporting requirements in service contracts held with passenger transport providers.

Taxi

In 2009, TMR included reporting requirements in service contracts held between TMR and taxi booking companies, requiring the provision of data about minimum service levels for booked conventional and wheelchair taxi jobs on a quarterly basis. This data informs TMR on service levels being provided to the public and is used to determine whether additional licences or changes to the existing fleet are necessary (for example, if there is a requirement for more wheelchair accessible taxis).

TMR continues to monitor the delivery of taxi services in Queensland to ensure compliance with licensing and service contracts. While not specifically targeted at compliance with the Transport Standards, monitoring does include such things as ensuring the minimum number of WAT bookings are met each month for WAT licenses. The provision of a dedicated Taxi Compliance Unit in 2010 and the added recent ability to undertake "covert" compliance programs has improved performance of the fleet.

Contracts with taxi booking companies also require them to provide data relevant to the provision of services at TMR's request within 20 business days.

Bus

Current urban bus contracts for regional Queensland contain a clause that requires bus operators to respond to TMR requests for information within 10 days. While this clause is not specific to collecting data on operator compliance with the Transport Standards, it does enable TMR to request data of this nature.

Ferry

A new ferry contract framework is currently being developed and will improve Transport Standard compliance reporting to TMR.

Air

Since 2007, TMR has included contractual clauses in current air service contracts to monitor and ensure air operators' compliance with Transport Standard milestones. TMR also requires documentation to be completed by air operators to evaluate and/or report upon the operator's compliance.

go card data

The introduction of go card onto the TransLink network in south-east Queensland in 2008 has enabled improved data collection on the travel patterns of commuters. The smart card allows data such as the travel patterns of commuters using a senior's concession go card to help inform future infrastructure planning. Using this information TMR is able to prioritise upgrades for stops and stations to areas where a higher proportion of seniors use the network.

Complaints

Complaints from users of the public transport network provide a means of identifying areas of the network that need improvement. TransLink Division has developed a new complaints management process to enable efficient management of high volume customer complaints from within south-east Queensland.

The new process provides easy access for customers to lodge complaints through a number of platforms including web, phone and traditional written options.

Built into this new process are access points for people with disability to lodge feedback and communicate with TMR. Through this communication and more effective management of customer issues (including for people with disability) TMR can better manage customer issues to resolution or outcome through the use of the information provided from this detailed customer reporting.

Complaints data captured through this process indicates that less than 1% of the overall complaints received in 2008 to 2012 for south-east Queensland are disability related. By comparison commendations received during the same time period indicate that over 2% of total commendations received in south-east Queensland are disability related.

TransLink Division also seeks customer feedback through quarterly customer satisfaction surveys. The survey asks customers about their level of satisfaction with the accessibility of stops / stations and vehicles, as well as escalator reliability at train and busway stations. This is a general public transport user survey however, and does not specifically focus on the ease of access to public transport for people with disability. The sample of people who complete the survey would however capture some people with disability. The surveys have indicated a slight positive trend in customer satisfaction with the accessibility of stops/stations and vehicles over a period of time for bus, rail and ferry modes of public transport.

Are there any other initiatives and actions in relation to removing discrimination from public transport services that do not come under the above, for which you can provide details.

Taxi Subsidy Scheme

TMR is responsible for administering the Taxi Subsidy Scheme (TSS). The TSS was introduced in Queensland in 1987 to provide an affordable and accessible transport option for people with disability who experience profound difficulties using other modes of public transport.

The Queensland Government subsidy funds 50% of the taxi fare for each trip to a maximum subsidy of \$25. Membership is not means tested and the number of taxi trips able to be undertaken and the amount of subsidies paid per member is unlimited. Members are issued with an electronic membership smartcard and are also entitled to a maximum of 20 interstate travel vouchers each 12 month period, for use with any taxi service in other jurisdictions.

For many people, taxis provide a flexible and affordable transport option. They are the only form of public passenger transport that provides a door to door service at any time. For many members of the TSS, taxis can be their only form of transport.

Access Passes

In south-east Queensland, TransLink Division offers a variety of free travel passes available for use for people with disability, subject to meeting the eligibility criteria and the provision of verification from a medical practitioner. These are flash passes suitable for people with disability that may not have the physical or cognitive ability to use the go card system, including AVVMs.

The types of flash passes accepted across all TransLink services are as follows:

- TransLink Access Pass - Available to eligible Queensland residents who have a significant permanent physical or intellectual disability but are still able to travel independently on public transport services. The holder of the pass is entitled to unlimited travel on the TransLink network, for an annual fee of \$60.
- National Travel Pass – Person with Vision Impairment – Available for eligible Queensland residents who are considered legally blind under the *Commonwealth Social Security Act 1991*. This pass entitles holders to free travel on all participating urban public transport services including bus, rail and ferry within Australia.
- Totally and Permanently Incapacitated (TPI)/Extreme Disablement Adjustment (EDA) Veteran

Travel Pass – Available for eligible TPI/EDA ex-service men and women. The pass entitles holders to unlimited free travel on approved public transport services throughout Queensland.

In addition to the above flash passes, the Companion Card program is designed for people with a disability who have a lifelong need for attendant care support in order to take part in activities and visit venues in the community. A person holding a Companion Card and a valid ticket or pass is entitled to free travel for one accompanying person who provides attendant care support. Companion Cards that are issued by any state or territory are also valid on Queensland's public transport network.

Assistance animals which are trained and used for the purpose of providing assistance to alleviate the effect of a person's disability are also accepted on all public transport services subject to meeting specific eligibility criteria.

Other Issues

Follow up from 2007 Review of Transport Standards

As a result of the 2007 Review of the Transport Standards a number of recommendations were released. At the time of the release, TMR raised concerns with some of the recommendations. Where these concerns have not been adequately addressed, TMR's issues have been reiterated below.

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 waiting times to be equal to conventional taxi waiting times.*

TMR has been participating in ongoing discussions with other jurisdictions to attempt to progress this recommendation.

There is universal agreement across all jurisdictions that there is significant difficulty in reaching a consistent, national position to deliver the recommendation. The complexity is in part, due to the absence of a national approach to the regulation of taxi services generally. While there are some similarities, each jurisdiction adopts a different approach and methodology to the measurement of waiting times for conventional and WAT services.

Given that the recommendation is extremely challenging to implement without significant financial investment and fundamental regulatory change in each jurisdiction, it is proposed that the recommendation (and the standard itself), be reviewed at a national level to determine an alternative approach.

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).*

Many community transport providers of services for people with disability or the elderly are volunteer or non-profit organisations. These organisations cannot afford upgrades to vehicles or the purchase of new accessible vehicles if required to be fully compliant with the Transport Standards. There is concern that these volunteer groups may potentially opt to remove the service if they do not have the financial means to make the vehicle compliant or to purchase a new accessible vehicle. This will result in less transport options for the community.

It is noted that in response to this recommendation, APTJC members have agreed that further detailed data gathering, feasibility analysis and possible alternative options in relation to the implementation of this recommendation need to be undertaken prior to final decisions. APTJC also referred Recommendation 13 to the Australian Community Transport Association (ACTA) for consideration. It is understood that ACTA recognises extensive data gathering is required in order to understand the full effect of the recommendation.

TMR would like to reiterate previously stated concerns relating to the implementation of this recommendation in Queensland and to have noted that unless funding is provided by the Commonwealth, the ability to implement this recommendation would be difficult.

Recommendation 14 - *Phased application of dedicated school bus services to physical access requirements in the Transport Standards, commencing in 2029 and being fully required in 2044.*

Queensland already has in place a range of school transport services to meet the needs of all students with disability. The cost to make dedicated school buses in Queensland compliant with the Transport Standards would be very high and given that the needs of students with disability are already being met, this level of expenditure is hard to justify.

It is noted that the Commonwealth considers the school bus fleet could be made compliant through operators purchasing compliant second hand buses previously used for general route services. This may not be a feasible option as there is evidence to suggest that operators will continue to operate a bus for as long as is economically viable to do so. The type of terrain travelled by school buses in regional areas also needs to be considered, as low floor buses used for general route services in metropolitan areas would be unable to travel on some regional roads. In addition, the contracted school bus fleet in Queensland has been made compliant with Australian Design Rule (ADR) 59/00 (Omnibus Rollover Strength) 2006 in general and ADR 68/00 (Occupant Impact Protection in Buses) 2006 in relation to additional braking systems, for school buses required to travel on very steep roads. Expecting the school bus fleet to be replaced with second-hand general route service buses would be a backward step in terms of safety.

It is noted that the implementation of this recommendation is being further considered at a national level. TMR would like to reiterate previously stated concerns in relation to the implementation of this recommendation in Queensland. There are approximately 2100 buses used in the school bus fleet. To replace the school bus fleet for the same type of buses currently used would cost \$480m. To replace the school bus fleet with compliant low floor large buses would cost an additional \$100 000 per bus. Unless significant funding is provided by the Commonwealth the ability to implement this recommendation would be unfeasible.

Concerns about the Transport Standards

Reporting Against Milestones

As part of the review of the Transport Standards conducted every five years, assessments against compliance milestones are required to be made. It is envisaged that each jurisdiction undertakes this reporting in a different manner across the country and there may also be variations in measurements and reporting undertaken across operators and providers within a jurisdiction. TMR suggests that advice from the Commonwealth outlining an agreed national approach to compliance milestone assessments would be beneficial in enhancing the consistency of measurement and reporting across jurisdictions.

Allocated Spaces

The Transport Standards sets out that if a waiting area is provided there must be a minimum of two allocated spaces or five per cent of the area must be available to people with disability. A standard bus shelter has seating capacity for four people with one allocated space at the end of the seat, and a space in front of the seat under cover if required. If two allocated spaces are provided at the end of the seat however, then the seating would hold only two to three people. This requirement is unclear and impractical, as it should only apply to large waiting areas such as bus stations and transit centres.

Furthermore, this requirement does not appear to be consistent with the minimum requirement for two allocated spaces for buses with more than 32 fixed seats; and at least one allocated space only for buses with less than 33 fixed seats.

TMR recommends that Part 7 of the Transport Standards is amended to include '*Except at bus stops that seat less than 7 people where a minimum of 1 allocated space/1 allocated seat is provided*'.

Payment of Fares - Vending Machines

Part 25 of the Transport Standards refers to 'Payment of Fares', with part 25.3 specifically outlining that vending machines must comply with Australian Standard (AS)1428.2 (1992) clauses 29.1 – 29.3. AVVMs currently used throughout the TransLink network do not comply with AS1428.2, clause 29.1 as part of the operative component is higher than the specified allowable height range. The highest touch point on the touch screen, the cancel button and coin slot are all above the specified 1200mm height limit.

The AVVMs are purchased from an American company and as such do comply with the required standards under the *Americans with Disability Act 1990*. The American Standard has a more generous height limit of 1370mm. Requesting the American company to adjust the configuration of the AVVMs to comply with the Australian Transport Standard would come at a significant cost to the State. It is also understood that New South Wales purchase the same AVVMs and as such would experience the same issue.

It should also be noted that the United Nations' *Accessibility for the Disabled: A Design Manual for a Barrier Free Environment* also has a more generous height limit of 1400mm. It is recommended that consideration be given at the national level to influence Standards Australia to review AS1428.2 clause 29.1 relating to height range, in light of international practice.

Conclusion

TMR believes that there have been numerous achievements over the past five years that have helped to enhance the accessibility of public transport for people with disability. These achievements have been identified and described in this submission.

TMR will continue to develop policy that promotes and supports the national approach to removing barriers for people with disability using public transport. Queensland's involvement in national policy is facilitated through participation in both APTJC and APTNAC and sub groups of these committees.

The need to consider the Transport Standards and other related disability anti-discrimination issues in the development of policy for fleet and infrastructure provisions will continue to be promoted across the TransLink Division and TMR.

Additionally TMR will continue to take an advocacy role, promoting awareness of the Transport Standards to Queensland providers and operators with the aim of improving the accessibility of the State's public transport network in accordance with the Transport Standards. TMR is working towards a fully integrated accessible public transport network in Queensland by 2032.

