



Western Australia submission to 2012 Review of the Disability Standards for Accessible Public Transport 2002 (Transport Standards)

Introduction

In May 2010 the Western Australia (WA) State Government integrated three key transport agencies into one portfolio; namely Department of Transport (DoT), Public Transport Authority (PTA) and Main Roads WA (MRWA). The integration has enhanced the coordination of operations, regulatory functions and policy development.

The Department of Transport's key focus is on strategic transport policy and planning, regulation and operational transport functions across the range of public and commercial transport systems that service WA.

The Department, together with its portfolio partners PTA and MRWA, has been working toward improving the accessibility of its facilities and services for people with disabilities in Western Australia under both Commonwealth and State legislation. Since 1996, with the adoption of *Going out and Getting There: Action Plan for Accessible Public Transport for People with Disabilities in Perth* (Action Plan), WA's interest is in ensuring public transport is accessible to all. In recognition that such access is vital for people with disabilities, it also assists the broader community including, in particular, seniors and parents with prams to participate effectively in community life.

The PTA is responsible for the design, construction, maintenance and operation of regional and metropolitan transport services since its establishment in 1993. The PTA's vision is to increase the use of public transport through the provision of customer-focused, safe and cost-effective passenger transport services.

The components of WA's public transport system that are subject to the Disability Standards for Accessible Public Transport 2002 (DSAPT) are:

- bus vehicles (including coaches which are not privately owned) and infrastructure, trains and train stations, and ferries, which are the responsibility of the PTA; and
- accessible taxis and some aviation infrastructure under the DoT's responsibility.

It needs to be mentioned that working towards improved access for people with disabilities is a requirement not only of the Commonwealth's Disability Discrimination Act, but is also required under state policies and legislation, including the WA Disability Services Act 1993. The Act applies to the provision of services to people with disabilities and mandates specific requirements in relation to Disability Access and Inclusion Plans. The WA Count Me In – Disability Future Directions Strategy outlined the need to ensure that key areas such as transport infrastructure and services would facilitate change and improve the quality of lives of people with disabilities.

The DOT continues to work closely together with its portfolio partners in the areas of access to public transport services and continues to contribute to the development and monitoring of Transport Standards as the state representative on the national Accessible Public Transport Jurisdictional Committee.

The WA submission to the federal Department of Infrastructure and Transport on the 2012 Review of Disability Standards for Accessible Public Transport 2002 is at Attachment One.

Has the accessibility of public transport within your jurisdiction improved since 2007? How has accessibility to conveyances (eg. Trains, buses and coaches, trams, ferries, wheelchair accessible taxis and aircraft) changed?

Yes, the accessibility of public transport within WA has improved since 2007, however there needs to be greater acknowledgement of the increased costs of implementation.

Public transport services

All new conveyances and infrastructure operated by the WA Public Transport Authority (PTA) are designed to meet the DSAPT. The PTA operates the public transport system servicing the Perth metropolitan area under its brand name 'Transperth'. The following improvements have been made since the last review:

- Transperth continues its long-term program to increase the number of accessible buses in its fleet with the purchase of 90 new low-floor accessible buses. As at 30 June 2012, Transperth operated 994 accessible buses out of a total fleet of 1253 (79.3 per cent) compared with 905 (77.4 per cent of 1170 vehicles) previously.
- The original 'A' series rollingstock in the Transperth rail fleet is a two car multiple unit which has been in service for approximately twenty years. The fleet was designed and built long before the DSAPT regulations came into effect and were non-compliant in a number of areas. However upgrade work has commenced which included relocation of door operating buttons; additional vertical grab poles, handgrips and grab rails; identified priority seating; identified wheelchair bays; changes to audio announcements; installation of rubber strips at doors to reduce train/platform gaps and the installation of destination displays on the front and rear.
- The newer 'B' Series rollingstock in the Transperth, a three car-set multiple unit design, commissioned into service in 2004 were designed to meet DSAPT requirements.
- The PTA's Transwa fleet providing transport to major regional centres in WA consists of 14 railcars of both standard gauge and narrow gauge rail services. There are nine standard gauge railcars of similar design – seven Prospector services and two for Avonlink services. The Avonlink railcars also provide the Merredin link services. These railcars were designed, manufactured and commissioned into service prior to the introduction of the current DSAPT and there are therefore some minor non-compliance associated with these vehicles. However, the vehicles will be made fully compliant within the timescales provided for by the DSAPT.
- The Australind (narrow gauge) railcars in the Transwa fleet were commissioned into service in 1987, well before the introduction of the DDA and prior to the implementation of the DSAPT in 2002. This fleet underwent a major refit programme to improve vehicle accessibility. This refit concentrated on non-structural areas of the vehicle while further assessment is made on the ability to modify the vehicle for full compliance to the DSAPT.
- The entire Transwa country coach fleet meets DSAPT requirements.

Aviation

The Department of Transport facilitates the provision of regular public transport (RPT) air services within WA. Airlines who operate RPT intrastate air routes that are subsidised or regulated by the State Government are required to be compliant with all Commonwealth Acts and Regulations, which includes aviation requirements contained in the Disability Standards for Accessible Public Transport 2002, made under subsection 31 (1) of the Disability Discrimination Act 1992. The State Government as a regular of airline routes, while not responsible for setting disability standards, acts to ensure that any airline appointed to operate on the route meets the disability standards set by the Commonwealth.

Taxis

The size of the multipurpose taxi (MPT) fleet has increased by 33% from 83 MPTs in 2007 to 110 MPTs in 2013 since the last compliance review in 2007. However, the growth in the number of MPT vehicles

has not matched that of standard (non MPT) vehicles because the Department of Transport has experienced limited uptake of MPT plates due to under subscription of applications for these types of taxis as compared to standard taxis. The DoT is exploring other solutions to meet demand for personal wheelchair accessible transport services outside of the taxi industry.

If compliance targets have not been met, can you elaborate on the reasons for not being able to meet these targets?

The PTA Station Upgrade Program involves upgrading selected stations on a priority basis to bring each station into compliance, whilst considering other issues including security, public art and asset management. The DSAPT timeframes requires only certain items to be compliant at a station. This would be impractical as it would mean upgrading certain aspects of a station, for example, handrails and gateways; when the remaining station is non-compliant. The PTA approach is more strategic and holistic in ensuring that when a station is upgraded, it is accessible from the set down bay to the train. This has resulted in the PTA exceeding the compliance requirements in some areas.

There are a number of areas that have proven to be impractical or difficult to implement. These include:

- **Train platform gap**
Technical constraints such as track curvature and gradients and rolling stock gauge requirements affect the vertical and horizontal gap between train and platform. Where a platform cannot be raised to approximate the same horizontal plane as the carriage floor along its entire length, other options will be explored which may include building up the platform height of the preferred accessible boarding point and its required circulation and maneuvering space to the same level or as near as practicable. Direct assistance is also available where a minimum of 1 hour notice is provided.
- **Hearing augmentation**
Effective and compliant hearing augmentation is difficult to achieve inside an existing railcar. Technical barriers primarily related to electrical interference associated with powering and air-conditioning the train need to be overcome before this is a viable enhancement of public address system announcements in most rail cars. Visual information provides information that is equivalent to simple audio information but is unable to exactly replicate more complex messages. It has the advantage over hearing augmentation in that it informs people who are totally deaf as well as those who are hearing impaired.
- **Booked Taxi services**
On booked taxi services, other forms of equivalent access may be used to supplement audio and/or visual service-related information. For example, detailed instructions relating to safety could be directly communicated to passengers who are deaf or hearing impaired.

It is difficult to achieve some of the specified dimensions due to constraints caused by railcar structure, for example exterior door pushbuttons and on-train toilets are surrounded by structural limitations and significant modifications will be required to achieve full compliance.

In 2007, about 94% of all taxi bookings received were serviced. However, since then there was an improvement to 97%. The figure of 97% achievement could be tempered by the fact that some users choose to make private appointments with drivers. Because this 'private' work is not booked through taxi dispatch services, no data is available on these jobs. It is estimated that over 90% of all wheelchair related services provided are privately arranged. Though the performance has improved, the Department is progressing towards achieving the compliance target of 99% which would be acceptable by the WA Taxi Industry Board.

However, as of July 2012, the 'on time' target for 'ASAP' jobs (that is, jobs which have been booked less than 30 minutes in advance) during off peak periods has improved from within 20 minutes to within 15 minutes, to align with the target for standard taxis. The 'on time' target for 2012 still reflects the previous standard, where 'on time' was defined as within 20 minutes. This had been done to increase the comparability of this standard for the years since 2007.

How has accessibility to information (eg, maps, timetables, announcements, etc) changed?

PTA is committed to ensuring all printed and web based information conforms to disability guidelines and is available in alternative formats. Timetables are now available in large print and braille (upon reasonable request).

New Transperth ticketing systems have been designed to be accessible. The PTA has also developed the 'Transperth Accessible Services and Ticketing' brochure which provides information to customers who are deaf, hearing-impaired or speech-impaired.

Information services including the Transperth InfoLine, Transperth website, TravelEasy and Transwa websites and ticketing/information centres cater for all passengers.

Transperth has broadened its communication methods and is also now Relay Service friendly. People with disabilities are able to use other means of contacting Transperth such as through internet calls on the computer, laptop or other types of internet-enabled mobile devices such as phones and Ipads.

PTA has developed a staff training DVD titled "Disability Awareness Training for Frontline Staff" delivered to all customer service personnel.

Station access maps have been developed and are available on the Transperth website.

A dedicated section "Accessible Services" has been developed with the Transperth website to provide information on various access issues such as accessible bus routes, mobility aids, and assistance dogs.

Transperth has been providing engaging presentations, displays and station tours as part of Transperth's 'Get on Board' education program for communities. Transperth delivers this program to a broad range of groups including community groups, workplaces, seniors & disability groups, migrant organisations, schools and universities. As part of these educational programs an educational tour was arranged for the legally blind so that they gain confidence in using the city stations and associated aids and facilities.

The PTA recognises the importance of public consultation on access issues during the planning, design and construction of key projects such as the Perth City Link. The consultation process includes on-site information sessions, information on websites and TravelEasy email update service. There are currently 124,575 subscribers for the service. Accessibility Bulletins are sent to individuals who sign up for the new Accessibility Group via TravelEasy.

TravelEasy is a free email notification system to communicate important changes relating to accessible services and/or infrastructure across the network. In the last 12 months, 5,858,917 emails of notification were sent.

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

The PTA formally launched its Bus Stop Accessibility Works Program in July 2010. The 14-year program progressively aims to upgrade bus stops across the State to meet the requirements of the Disability Standards for Accessible Public Transport (Disability Standards) and the Disability Discrimination Act. This program has continued during the 2011-12 period completing a total of approximately 600 bus stops which brings the combined total of upgraded bus stops to 1400 since the commencement of this program. Under the program, the government has initially allocated more than \$3 million per annum to the PTA to upgrade its network of 13,000 bus stops.

All new train stations are designed and constructed to meet the Transport Standards as far as practicable. A long-term program to improve existing train stations to meet the Transport Standards as far as practicable has been implemented. While many of our facilities are years ahead of official disability standards, some older stations still require work to meet compliance requirements. During 2012, the stations upgraded included Mt Lawley and Meltham train stations, as well as Mirrabooka Bus Station.

All bus stations were audited against the Transport Standards and a works program was implemented to ensure that all bus stations meet the Transport Standards as far as practicable.

Taxi ranks are being upgraded to increase security. This will benefit both MPT users and conventional taxi users. This means that ranks will have better lighting, signage, and information about local public transport.

The accessibility to the ranks will be reviewed to ensure the inclusion of people with disabilities. For example, every rank will be wheelchair accessible and ground indicators will be installed for people with impaired vision.

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

The PTA has developed a tool to facilitate the collection of data to assess its conveyances and infrastructure. The checklist used by PTA staff was developed in consultation with an Access Consultant to measure the level of accessibility of PTA infrastructure against the requirements in the DSAPT and associated Australian Standards.

Some taxi bookings were not made directly through taxi dispatch services by individuals because MPT users prefer to have a familiar driver. It is estimated that over 90% of all wheelchair related services are privately arranged and this practice has affected data accuracy. Other options of obtaining better information about private jobs are being investigated and arrangements for data sharing with taxi dispatch services may be developed.

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?

The PTA has developed an overarching document titled 'Accessibility Policy' which provides a more consistent approach when dealing with accessibility issues including passengers travelling with assistance dogs and parking for people with a disability.

Under Western Australian regulation the PTA is required to implement a publicly available "Disability Access and Inclusion Plan" the current plan covers the period 2012-2017. The development of this plan required extensive stakeholder consultation. This plan addresses how the PTA will meet its compliance with the Transport Standards and requirements of the Western Australian Disability Services Act (1993).

The PTA is also a committee member of the Disability Network Group established by the Department Transport WA aimed to provide strategic advice that identifies or addresses policy gaps; as well as provides a forum for professionals to exchange, share information and support the needs of people with disabilities with respect to the transport system.

In March 2010 a standby vehicle scheme was implemented. The standby vehicle is a wheelchair accessible taxi dedicated solely to MPT jobs which would otherwise not be covered. If a wheelchair job is not taken by a driver after being advertised on the system for 10 minutes, it is allocated to the standby vehicle. The standby vehicle operates from 8am until 6pm, seven days a week. Trials for the standby vehicle began in 2008. The number of off-peak MPT jobs not covered has decreased from 5.45% in 2007 to 2.49% in 2012. These 'off peak' taxi periods when the standby vehicle operates are the times of the greatest MPT demand. The standby vehicle conducts about 3,200 wheelchair jobs a year.

Other comments:

The DSAPT state the compliance requirements for 31 items which are given the same level of priority. For example:

- Signage with braille on a toilet door versus accessible ramps from the fare gate to the platform;
- Accessible buses versus accessible food/drink vending machines

Consideration must be given to prioritising the 31 items based on the ability for a passenger with a disability to travel to a destination.

Public Transport Authority Level of Compliance**Trains**

Key Aspects	Dec 2012 Compliance Level Required	Dec 2012 Actual Progress
Alarms	100%	100%
Surfaces	100%	100%
Boarding	55%	100%
Allocated Space	55%	90%

Ferry Vessels

Key Aspects	Dec 2012 Compliance Level Required	Dec 2012 Actual Progress
Alarms	100%	100%
Surfaces	100%	100%
Boarding	55%	100%
Allocated Space	55%	100%

Buses

Key Aspects	Dec 2012 Compliance Level Required	Dec 2012 Actual Progress
Ramps	55%	82%
Alarms	100%	50%
Surfaces	100%	100%
Boarding	55%	82%
Allocated Space	55%	82%

Coaches

Key Aspects	Dec 2012 Compliance Level Required	Dec 2012 Actual Progress
Ramps	55%	95%
Alarms	100%	95%
Surfaces	100%	100%
Boarding	55%	95%
Allocated Space	55%	95%

Jetties

Key Aspects	Dec 2012 Compliance Level Required	Dec 2012 Actual Progress
Alarms	100%	n/a
Surfaces	100%	100%
Access Paths	55%	100%
Ramps	55%	50%
Boarding	55%	50%
Allocated Space	55%	100%
Toilets	55%	100%

Bus Stations

Key Aspects	Dec 2012 Compliance Level Required	Dec 2012 Actual Progress
Alarms	100%	50%
Hearing Augmentation	100%	0%***
Surfaces	100%	100%
Access Paths	55%	89%
Ramps	55%	88%
Boarding	55%	100%
Allocated Space	55%	0%##
Lifts	55%	100%
Toilets	55%	85%

***Hearing augmentation has not been provided as there are no automated announcements made at the bus stations.

Allocated spaces refer to the markings of designated areas for passengers with a mobility aid to wait for a bus. There is adequate space for passengers with a mobility aid to wait for a bus; however these spaces have not been signed for the purpose.

Train Stations

Key Aspects	Dec 2012 Compliance Level Required	Dec 2012 Actual Progress
Alarms	100%	79%
Hearing Augmentation	100%	88%
Surfaces	100%	92%
Access Paths	55%	78%
Ramps	55%	71%
Boarding	55%	76%
Allocated Space	55%	0%##
Toilets	55%	81%

Allocated spaces refer to the markings of designated areas for passengers with a mobility aid to wait for a train. There is adequate space for passengers with a mobility aid to wait for a train; however these spaces have not been signed for the purpose.