

VICTORIAN GOVERNMENT SUBMISSION

2012 REVIEW OF THE DISABILITY STANDARDS FOR ACCESSIBLE PUBLIC TRANSPORT 2002

RESPONSE TO COMMONWEALTH GOVERNMENT ISSUES PAPER



Table of Contents

1. Executive Summary.....	3
2. Context.....	5
2.1 Policy and legislative setting	5
2.1.1 Legislation	5
2.1.2 Policy initiatives.....	5
2.2 Background to DSAPT 2012 Review	6
3. Progress towards improving access to public transport in Victoria	7
3.1 Challenges in providing accessible public transport	7
3.2 Government initiatives to address the challenge	8
4. DSAPT 2012 Review Issues Paper	9
4.1 Question 1 - Has the accessibility of public transport within your jurisdiction improved since 2007?.....	9
4.1.1 Accessibility of conveyances	9
4.1.2 Accessibility of information.....	14
4.1.3 Accessibility of facilities	16
4.1.4 Changes to collection and reporting of data on public transport accessibility	19
4.2 Question 2 - 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?	20
4.2.1 Ramp access to railway stations and platforms.....	20
4.2.2 Train boarding	20
4.2.3 Taxis.....	21

1. Executive Summary

The Victorian Government is committed to improving universal access to public transport services and facilities for all Victorians and addressing the travel needs of people with disabilities or mobility restrictions.

The government recently released the *Victorian State Disability Plan 2013-2016* which reflects our wider commitment to ensuring that people with a disability have a chance to participate fully in Victoria's economy and the community. The *Accessible Public Transport in Victoria Action Plan 2013-17* due for final government approval in May 2013, will outline specific priorities and outcomes that will improve access to public transport services and facilities over the next five years.

In the last five years, Victoria has made progress towards improving access to public transport and removing barriers to access for people with a disability. Government funded initiatives have delivered new accessible trains, trams and low floor buses, new or upgraded train stations, level access tram stops and upgraded bus stops. New electronic and audio information has been provided at public transport facilities and customer service and direct assistance has improved. Additional wheel chair accessible taxi (WAT) licenses have been issued and the government has significantly increased the annual subsidy cap and trip cap for the Multi-Purpose Taxi Program (MPTP).

Despite progress towards improving access to public transport, Victoria faces a significant challenge in improving access to tram services. Improving access to trams is constrained in the short term by the fact that older high floor trams cannot be retro-fitted and the tram replacement program is a longer term strategy for improving access. Also, there are considerable challenges in making tram stops accessible. Construction of level access stops is limited and can be constrained by issues associated with traffic congestion, parking availability, business and residential access in certain situations.

The government intends to improve the quality and reliability of data that reports progress against the milestones of the *Disability Standards for Accessible Public Transport 2002* (DSAPT). Improved baseline data for trams and buses has been established and a train infrastructure audit will commence in 2013. However, the government is concerned that no consistent or comparable reporting framework exists at the national level despite recommendations made in the 2007 DSAPT Review.

The Victorian Government makes the following recommendations:

Recommendation 1

Review clause 8.2 of DSAPT with the aim of developing a specific standard for trams and trains in consultation with people with a disability.

Recommendation 2

A labelling scheme to be further developed for mobility aids (wheelchairs, scooters and strollers) for use on public transport consistent with national and international standards in consultation with people with a disability. Also, consumer information at the point of sale should be mandatory regarding the use and suitability of mobility aids on public transport.

Recommendation 3

The government supports the VTD having some flexibility in setting regulations with regard to minor intrusions in a three dimensional allocated space for accessible taxis.

Recommendation 4

A nationally agreed audit approach and methodology to be developed to assess progress against DSAPT within and across jurisdictions and obtain comparable baseline data.

2. Context

2.1 Policy and legislative setting

2.1.1 Legislation

The Victorian Government is committed to providing public transport services that are accessible to all members of the community. A key objective under the Victorian *Transport Integration Act 2010* (TIA) is for the transport system in Victoria to provide a means by which people can access social and economic opportunities to support individual and community wellbeing by:

- minimising barriers to access so public transport is widely available; and
- providing tailored infrastructure, services and support for persons who find it difficult to use the transport system.

The objectives of the TIA align with both the Commonwealth *Disability Discrimination Act 1992* (DDA) and the Victorian *Equal Opportunity Act 2010* that both have the objectives of removing discrimination and providing equivalent access to public transport services for people with a disability. The DDA prohibits direct and indirect discrimination on the grounds of disability and makes it unlawful to discriminate on the grounds of disability in a wide range of areas including transport services.

Providers of goods and services (including public transport providers) are required to make reasonable adjustments for people with a disability under Victoria's Equal Opportunity Act. Making reasonable adjustments requires a service provider to balance the need for change with the expense or effort involved in making this change. If an adjustment requires a disproportionately high expenditure or disruption it is not likely to be reasonable.

The DSAPT specify how the objectives of the DDA are to be achieved in the provision of transport services. The purpose of DSAPT is to progressively remove discrimination on the basis of disability from public transport services over a 30-year period.

The DSAPT guiding principles are to:

- eliminate discrimination against people with disabilities as far 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.

2.1.2 Policy initiatives

The government recently released the *Victorian State Disability Plan 2013-2016* which reflects our wider commitment to ensuring that people with a disability have a chance to participate fully in Victoria's economy and the community. This plan includes goals and outcomes that are aimed at increasing transport options, improving access to public transport buildings and places and having more accessible government information about services.

The government's support for a sustainable National Disability Insurance Scheme, including an initial launch in the Barwon area, demonstrates a commitment to finding innovative ways of supporting people with a disability.

In combination with the State Disability Plan, the government will finalise the *Accessible Public Transport Action Plan 2013-2017* in May 2013 for public release. The action plan outlines the accessibility outcomes under four priority areas when providing public transport services:

- Customer service
- Consultation and community engagement
- Access to public transport services
- Access to public transport facilities

The government's broader focus on improving access to public transport will be underpinned by compliance with the DDA and DSAPT. All of the priorities and outcomes of the action plan must as a minimum achieve compliance with DSAPT.

The action plan takes a whole of journey approach to accessibility that recognises the need for people with a disability to be able to access information to plan their journey and that pathways to various modes of public transport services are as important as physical access itself. This broader approach also provides a greater focus on better integrated and co-ordinated public transport services.

2.2 Background to DSAPT 2012 Review

The Commonwealth Government commenced its five year review of DSAPT on 19 October 2012 with the release of a Terms of Reference. These transport standards outline how the objects of the DDA will be achieved.

Part 34 of DSAPT requires the Minister for Infrastructure and Transport, in consultation with the Attorney-General, to review the efficiency and effectiveness of the standards every five years.

The review will focus on:

- reporting public views on progress towards meeting DSAPT;
- assessing compliance with DSAPT milestones across jurisdictions;
- identifying initiatives and actions that have removed discrimination in each jurisdiction; and
- assessing the progress of the implementation of the response to the 2007 Review.

The Department of Infrastructure and Transport (DIT) released an Issues Paper in November 2012.

The Issues Paper has a specific section that provides an opportunity for State and Territory Governments to detail initiatives and actions undertaken over the last five years to eliminate discrimination against people with disabilities.

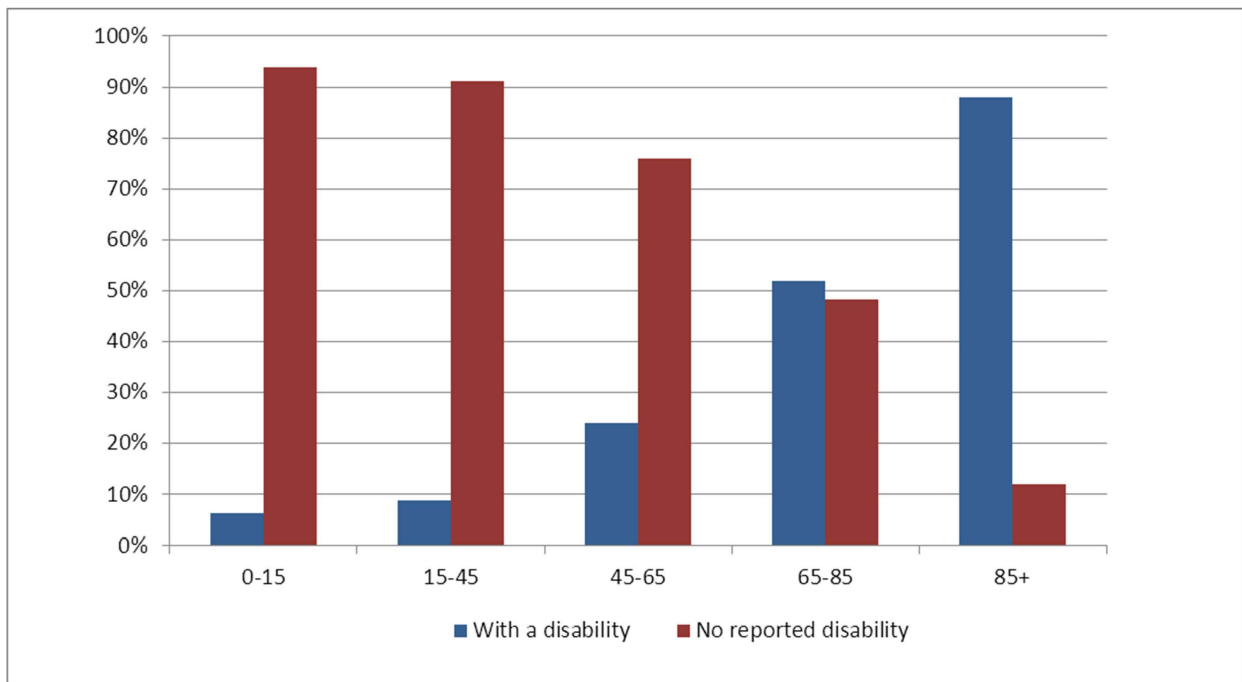
The Victorian Government is represented in the Accessible Public Transport Jurisdictional Committee (APTJC) and has been involved in the implementation of recommendations from the 2007 DSAPT Review. As an active member of APTJC, the Victorian Government is keen to make a submission to the 2012 DSAPT Review.

3. Progress towards improving access to public transport in Victoria

3.1 Challenges in providing accessible public transport

As the percentage of older people in the Victorian population rises, mobility issues and the incidence of disability will become more common, resulting in an increased need for accessible transport. With an aging population, it would be expected that the level of disability in the community will increase over time.

Figure 1 – Victorians with a disability by age - 2009



Source: ABS 4430.0 - *Disability, Ageing and Carers, Australia: Summary of Findings*, 2009

In 2009, 18.4 per cent (1,000,100) of Victoria's population of 5,443,200 reported having a disability.¹

The Australian Bureau of Statistics (ABS) survey results showed the following numbers of people were constrained in core activities of self-care, mobility or communication:

- 338,200 people reported having a profound or severe limitation (this represents 33.8 per cent of those reporting a disability, or 6.2 per cent of the Victorian population)
- 448,100 people reported a moderate or mild core activity limitation (this represents 8.2 per cent of the Victorian population)

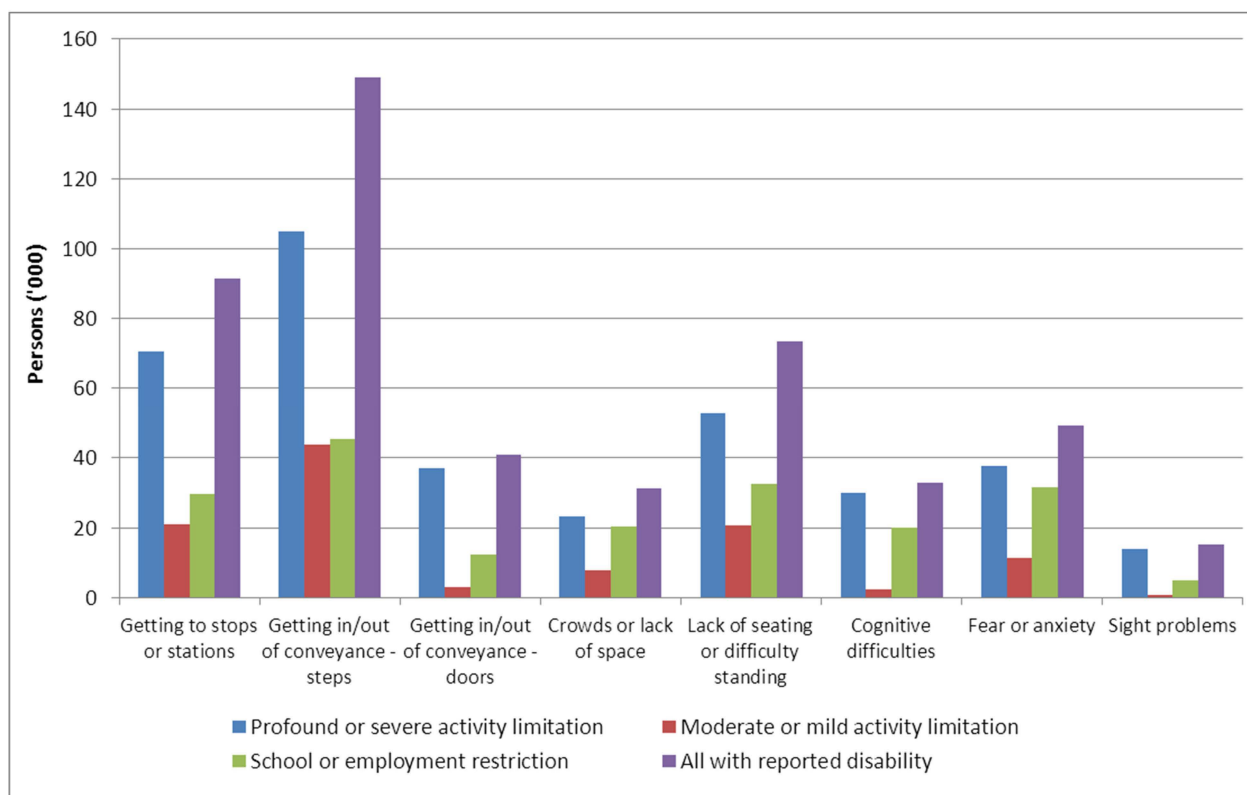
The ABS survey data also shows that 41 per cent (389,800) of people with a reported disability use public transport in Victoria and 33 per cent of all those with a reported disability have difficulty using public transport.

Figure 2 shows that the major reasons for people not using public transport are due to difficulties of physical access to public transport facilities and being able to get on and off trains, trams, buses and coaches. There are also other significant barriers to access that people encounter

¹ ABS, 4430.0, 2009, *Disability, Ageing and Carers, Australia*

other than physical access. A significant number of people had difficulty using public transport because of crowding or lack of space, lack of seating, cognitive difficulties and, fear or anxiety.

Figure 2 – People who have difficulty using public transport in Victoria – key reasons - 2009



Source: ABS 4430.0 - *Disability, Ageing and Carers, Australia: Summary of Findings, 2009*

3.2 Government initiatives to address the challenge

Over the last 10 years, the Victorian Government identified and addressed a number of barriers to accessing public transport services for all Victorians but in particular, people with disabilities and those with mobility restrictions. These initiatives include:

- Level access tram stops constructed across Melbourne up to the current total of 364, including a number of them completed over the last 18 months such as: Domain interchange, Macarthur Street, East Melbourne; Swanston Street, Melbourne/Carlton; Royal Children's Hospital; High Street, Northcote, Bridge Road, Richmond, and two tram stops in Flemington/Haymarket;
- A tram replacement program with 100 low floor accessible trams in operation in Victoria and a further 50 new E Class low floor trams on order;
- New more accessible metropolitan and regional trains have been purchased since 2007 and many are now operating on the network (41 metropolitan trains and 40 regional train carriages);
- Construction of new railway stations with accessible design features, such as Cardinia Road, Lynbrook, Williams Landing, Coolaroo, Roxburgh Park, Westall, South Morang, Epping, Wendouree and Wodonga;
- Major upgrades to railway stations, including the North Melbourne, Laverton, Sunbury, Clunes, Creswick, Maryborough and Frankston Station redevelopments and grade separations at Nunawading and Laburnum Stations that made these railway stations more accessible;

- Upgrades to more than 10,000 bus stops across Victoria including the installation of tactile ground surface indicators, access paths and surface upgrades;
- A bus replacement program with a total of 1,421 low floor buses on the metropolitan network; and
- 530 additional taxi licences granted (10 year term) in greater Melbourne in response to a growth in demand for taxi services that included 286 new WAT licenses being issued; and
- the introduction of tactile signs for taxis that are compliant with DSAPT.

Victoria faces a significant challenge in improving access to tram services. Melbourne has one of the largest tram networks in the world and it will require extensive infrastructure and rolling stock upgrades or replacement to meet transport disability standards. However, the government is committed to meeting the DSAPT timetable and will detail the outcomes that will progressively improve the accessibility of the tram network in the *Accessible Public Transport Action Plan 2013-2017*.

The government has committed \$20 million over four years commencing in 2011-12 to improve accessibility to public transport services. The first year of funding was entirely allocated to improving access to railway stations. Over the remaining three years of the program, funding is proposed to be allocated on the basis of 80 per cent for railway stations and 20 per cent for bus stops.

In addition to this specific accessibility funding, there is an additional \$70 million over four years for tram stop upgrades (2010-14), as part of an overall \$800 million tram upgrade program.

The program to be delivered by Public Transport Victoria (PTV) will include:

- purchase of 50 new low floor trams between 2012 and 2017;
- upgrades to Route 96, the first route on which the new low floor trams will operate;
- redevelopment of the Preston Workshops and Southbank Depot where the new trams will be stored; and
- power upgrades and accessibility improvements to other low-floor tram routes.

4. DSAPT 2012 Review Issues Paper

4.1 Question 1 - Has the accessibility of public transport within your jurisdiction improved since 2007?

How has accessibility changed?

Have compliance targets been met?

If not met, can you elaborate on reasons for not being able to meet targets?

4.1.1 Accessibility of conveyances

4.1.1.1 Trains

The overall level of train accessibility is good across the metropolitan network and has improved significantly for regional trains over the last five years. For train services to be accessible, people with a disability must be able to:

- move from the platform onto the carriage and back again, managing any gap between the carriage and the platform (including direct assistance or the use of boarding ramps);

- be able to access allocated space inside the carriage including the use of mobility aids or assistance animals;
- access information and announcements on board in an acceptable format including screen based as well as audio; and
- obtain information or assistance from staff at train stations or drivers where boarding or other assistance is required.

All trains in the suburban fleet meet these requirements and are compliant with DSAPT except for the 5 Hitachi trains that are still operating on the network. The Hitachi trains would only be compliant on boarding access given the manual deployment of ramps at the front carriage. A total of 98 per cent of the train fleet of 204 are accessible and compliant with DSAPT. For the metropolitan train network 45 new X'trapolis trains were ordered since 2007 (41 are currently in service) and meet DSAPT standards for rolling stock.

While there is a high level of accessibility to metropolitan train carriages, it should be noted that boarding for people with physical disabilities often requires direct assistance from station staff, train drivers or carers. People with a mobility impairment (particularly those in a wheelchair or those using a mobility aid) that do not have a carer would typically need a ramp to be deployed for them to enter and exit the train. Current operating practice is for people with a mobility impairment to enter the train from the front carriage where the driver deploys a ramp. The lack of independent access means that passengers with a mobility impairment may find boarding access to trains either easy or difficult depending on their knowledge and experience of the boarding ramp operating practice (see discussion below regarding raised platform ramps in 4.2.2).

For regional trains in Victoria, 92 per cent of the 62 trains on the network are accessible and fully compliant with DSAPT. Since 2007, 80 new VLocity train carriages were ordered and 40 are currently in service. All these new trains are accessible and compliant with DSAPT except for independent boarding in certain situations where direct assistance will be required.

All regional trains meeting accessible boarding requirements and carriages can be entered by people with a mobility impairment at any carriage. Some of the older carriages are not compliant in regard to manoeuvring areas and allocated spaces.

Access to regional train services is enhanced by a greater level of direct assistance from staff at all regional train stations and conductors that are on board all services (compared to metropolitan train services). This helps to overcome some of the access constraints on the mix of regional trains still in service and is regarded as equivalent access.

4.1.1.2 Trams

Victoria faces a significant challenge in improving access to tram services in Victoria. Melbourne has one of the largest tram networks in the world and it will require extensive infrastructure and rolling stock upgrades or replacement to meet DSAPT. For a tram to be fully accessible, people with a disability must be able to:

- board the tram safely from the tram stop (including the use of a boarding solutions where required)
- travel on the tram safely in an allocated space;
- access information on the tram that is available to other passengers; and
- get off the tram safely at their intended destination (including being able to notify the operator when assistance is required to get off).

Currently, 100 low floor accessible trams (Citadis and Combino trams) are in operation in Melbourne's tram fleet of 487. Where a platform stop exists, most passengers with a mobility impairment will be able to board a low floor tram safely and independently unless there is a boarding gap acting as a barrier to access. Victoria's objective is to provide independent access which is best achieved with low floor trams and level access stops. The government recognises that there will be circumstances due to variable factors such as tram loading and platform height that will create a boarding gap and barrier to access. PTV and the operator, Yarra Trams, are exploring solutions to address the boarding gap and allow independent access as far as possible and provide direct assistance where this cannot be achieved. It should be noted that low floor trams are not always physically accessible due to the limited number of level access tram stops across the network and the fact that low floor trams only operate on a limited number of the 29 tram routes in Melbourne (see discussion below in 4.1.3.2).

Providing manual or power assisted boarding where independent access to trams cannot be achieved has operational and logistical challenges. There is no standard specifying the vertical and horizontal gaps which should not be exceeded for independent access. Rather, it is inferred from clause 8.2 of DSAPT governing the use of boarding devices. The current boarding gap of 12mm (vertical) and 40mm (horizontal) specified in DSAPT is based on an Australian Standard for hoists and ramps used for road transport including buses and taxis. However, there is no specific standard for trams and European standards have different vertical and horizontal gap requirements for deployment of ramps. Victoria recommends that the current standard in 8.2 be reviewed with the aim of developing a specific standard for trams.

The tram replacement program will continue with the ordering of 50 new E Class low floor trams. This will improve the overall accessibility of the tram network.

The DSAPT 2012 compliance targets for tram rolling stock have not been met and are currently around 23 per cent. This is due to the fact that upgrades of trams rely entirely on turnover of existing rolling stock with new trams because older high floor trams cannot be retrofitted and made accessible. The Victorian Government is committed to improving access to tram services and meeting DSAPT milestones and the eventual compliance targets in 2032. However, it should be noted that trams are on a replacement cycle of 30 years and Victoria is likely to have difficulty meeting the 2017 milestones.

Recommendation 1

Review clause 8.2 of DSAPT with the aim of developing a specific standard for trams and trains in consultation with people with a disability.

4.1.1.3 Buses and coaches

For buses to be accessible under DSAPT, passengers need to be able to:

- board and get off the bus safely from/to kerbside stops or interchange areas (including use of ramps or other direct assistance);
- utilise priority seating, allocated spaces and adequate manoeuvring areas; and
- access adequate signage and information.

For metropolitan Melbourne, the Bus Replacement Program has achieved 75 per cent compliance with DSAPT and significantly advanced the accessibility of bus services in Melbourne. A total of 1,421 low floor accessible buses out of a total fleet of 1,768 is a significant advance on

bus accessibility since 2007 and is well in advance of DSAPT 2012 compliance milestones. All low floor buses have manual ramps fitted so it can be deployed by the driver for people with a mobility impairment to be able to access the bus. All new low floor buses meet DSAPT requirements for priority seating, allocated spaces and manoeuvring.

For regional bus services, around 49 per cent of the 554 buses that operate in regional towns and rural areas of Victoria are accessible and meet DSAPT requirements. Given the greater mix of old and new buses in regional areas, this figure should be treated with some caution. While this figure is below the DSAPT 2012 compliance target of 55 per cent, the Bus Replacement Program will increase the number of low floor accessible buses in regional areas over time.

For regional coach services operated by VLine, 56 per cent of the total fleet of 103 coaches are accessible and meet the requirements of DSAPT. This level of accessibility meets the DSAPT 2012 milestone. The biggest accessibility challenge for passengers of coach services is the use of mobility aids. PTV and VLine recommend that passengers with mobility aids that a wheelchair or mobility aid meet the following specifications:

- fit within an allocated space of 1300mm (length) and 800mm (width);
- be no more than 750mm wide at a height of 300mm above the ground to fit between the wheel axles of a bus;
- the total weight of the mobility aid, its user and any attendant must be less than 300kg; and
- mobility aids that are to be carried on a bus must have anchor points.

Victoria recognises that APTJC and Austroads has carried out considerable work on mobility aid standards and labelling since the 2007 DSAPT Review. The government acknowledges that this is a difficult issue to resolve and needs to be considered in the wider context of mobility aid use on roads and linked infrastructure. However, there is an urgent need to progress such a labelling scheme to provide certainty for wheelchair and scooter passengers using public transport. The Victoria Government argues that a labelling scheme should be developed for mobility aids for use on public transport consistent with national and international standards. Also, consumer information at the point of sale should be mandatory regarding the use and suitability of mobility aids on public transport.

Recommendation 2

A labelling scheme to be further developed for mobility aids (wheelchairs, scooters and strollers) for use on public transport consistent with national and international standards in consultation with people with a disability. Also, consumer information at the point of sale should be mandatory regarding the use and suitability of mobility aids on public transport.

4.1.1.4 Taxis

The Victorian Taxi Directorate (VTD) regulates the taxi industry in Victoria and is focused on creating reliable, safe and customer-focussed taxi services. Since 2007, significant improvements have been made through a range of targeted initiatives aimed at addressing accessibility of taxi services. The Victorian Taxi Industry Inquiry (TII) process, currently under government consideration, offers further opportunities to build on this work and institute reforms that provide enduring benefits to taxi users with a disability.

The VTD administers the MPTP, which provides subsidised taxi travel to 160,000 people with severe and permanent disabilities. Over the last five years there has been considerable feedback from MPTP members and advocacy groups about taxi services for people with a disability. A range of issues have been consistently highlighted, including the extended wait times experienced by wheelchair users, the safe carriage of passengers in WATs and the importance of disability awareness training for taxi drivers.

In December 2008, changes were made to the MPTP. These changes included the doubling of the annual subsidy cap to \$2,180 and the individual trip cap to \$60 respectively. This significant change improves access to transport and provides more affordable travel choices for people with a disability who cannot use other independent means of travel.

The government recognises that those who rely on these vehicles as their primary mode of transport, the WAT subsidy scheme plays an important role in keeping people connected with family, friends and their community.

The WAT scheme in Victoria helps country taxi operators buy WAT vehicles. To date, a total of 63 subsidy applications have been approved for new or replacement WATs across regional Victoria. The subsidy funds the difference in capital purchase costs between conventional taxis and WATs with eligibility based on community need and the operator's financial capacity.

A total of \$3.3 million has been allocated for the subsidy scheme, which aims to:

- maintain and improve the availability of WATs for people with a disability living in country towns, and
- make the operation of WATs more cost effective for the providers of taxi services.

To address the concerns of taxi users with a disability, VTD introduced the Performance Based Booking System (PBBS) which is a voluntary incentive scheme for Network Services Providers (NSPs) designed to ensure that people with a disability using a WAT receive the same level of service as all other taxi-cab users.

Since January 2011, ramps fitted to WATs must now have a gradient not steeper than one in six when deployed to improve assisted access to taxi services. Ramps with a gradient of one in four are being phased out. Additionally, since January 2011, the Victorian Taxi Directorate (VTD) has required the three dimensional allocated space for each wheelchair position in new or replacement taxis in accordance with section 9.3 of DSAPT. This allocated space comprises 1300mm length x 800mm width x 1500mm height with no protrusions.

The Taxi Industry Inquiry (TII) recommendation 3.1 does not support a strict interpretation of the three dimensional allocated space requirement for wheelchairs citing adverse outcomes for accessibility, vehicle quality and operator costs. Instead, it suggests that the State taxi regulator allow some flexibility in regards to minor intrusions into the allocated space.

Under recommendations 3.2 & 3.3, the TII promotes a wider range of vehicles for the Victorian taxi fleet, including a purpose built universally accessible taxi similar to the London 'black cab' and the New York Nissan NV200 to improve services and that this type of vehicle be eligible for all wheelchair trip incentives including the MPTP subsidy and wheelchair lifting fee.

Recommendation 3

The government supports the VTD having some flexibility in setting regulations with regard to minor intrusions in a three dimensional allocated space for accessible taxis.

Driver training

In 2008, driver training was rolled out into regional Victoria to ensure all WAT drivers met the required standards in delivering services to people with a disability.

Under recent changes, operators and NSPs in urban and country areas may now train drivers in WAT work. Training must ensure drivers are proficient in the competencies set out in the national unit TLIC2040A 'Provide wheelchair accessible taxi services to passengers with disabilities'. A copy of these competencies has been provided to all urban and country NSPs.

The VTD subsidises state-wide training, paying for the driver's WAT course fee, assessors' travel for regional Victoria and a payment for the driver's time to attend the training.

In 2011, the WAT driver training from Victoria was adopted into a national training framework. Since then, the VTD has reviewed Registered Training Organisations (RTO) and enforced continual improvement and training enhancement through guidelines and quarterly meetings which have led to industry-funded training for trainers.

4.1.2 Accessibility of information

4.1.2.1 Public Transport

To help improve access to information and meet the requirements of DSAPT, public transport operators and providers must ensure that:

- general information including timetabling and maps must be available to all passengers in a range of formats;
- large print format be available for printed publications with stipulated colour contrast;
- direct assistance be provided to passengers (equivalent access) when their preferred format for information is not available;
- on board information about passengers' whereabouts during a journey.

The Victorian Government is committed to a whole of journey approach that recognises that people with a disability need to access information to plan their journey and that information about pathways to various modes of public transport services are as important as physical access itself.

With this in mind, PTV and transport operators have improved information available on respective websites and in printed form including improved timetable information and more accessible network maps for metropolitan and regional trains, trams and metropolitan buses. Large print versions of published information are available on request. Also, there are now enhanced electronic tools to help people plan their trip through PTV's Journey Planner which is available on the internet or via a smart phone application. Also, there is service update information from metropolitan train operator Metro on its website or via SMS on delays, cancellations and planned works. For the tram network, the operator Yarra Trams provides up to date service information through tramTRACKER which is available on the internet, smart phones and SMS.

Other initiatives since 2007 to help improve information to passengers when travelling include:

- more customer service officers at major city tram stops and train station interchanges providing information and advice during peak hours; and
- progressive installation of display screens at tram stops with timetable information.

While these initiatives and changes have resulted in improved access to information, it is unlikely that the public transport network as a whole is 100 per cent compliant with the information requirements of DSAPT. The metropolitan train services are the closest to the DSAPT milestone.

There are gaps in accessibility of information particularly on board trains, trams, buses and coaches. Around half of the metropolitan train stations have audio information only and do not have staff to provide direct information assistance to people who are Deaf or hearing impaired. These stations do not have Public Information Displays (PID) or staff. Also, some metropolitan trains and most trams and buses do not have visual information to accompany audio announcements.

There is also a need to improve the accessibility of PTV and transport operator websites and have printed information available in easy English and a range of other formats not currently available including Auslan.

To this end, the *Accessible Public Transport in Victoria Action Plan 2013-2017* has key outcomes that are aimed at addressing access barriers to information and highlights the whole of journey approach and the importance of accessible information to all passengers. These key desired outcomes over the next five years under the action plan's Priority 1 - Customer Service include:

1. Information is accessible for all passengers regarding public transport services, and
 - timetables printed and electronic information from PTV and service providers will be made available in clear and concise language
 - upon request, printed information from PTV or public transport operators will be available in large print, easy English or Braille
 - service and timetable information is provided through a range of mediums including telephone, TTY, Internet, mobile phone applications and SMS
2. Accessible next service information at public transport facilities
3. Adequate and accessible live information and announcements in case of service disruptions, cancellations and major events
4. Staff services are provided to assist people with a disability or mobility restriction

The government is also committed to improving access to information as a key identified outcome in the *Victorian State Disability Plan 2013-2016*.

Part of the government's program to improve access to information at public transport facilities includes installation of PIDs at 11 metropolitan railway stations in 2013. PTV will progressively roll out installation of PIDs at metropolitan and regional railway stations over the life of this action plan.

4.1.2.2 Taxis

In early 2013, the VTD produced a DVD on WAT services for industry participants and stakeholders covering topics including:

- providing good customer service;
- safely loading and securing passengers and their wheelchairs;
- the need to communicate effectively at the start, during and at the end of the trip;
- correct use of the MPTP Taxi Card and the correct charging of fares; and
- the availability and use of communication aids such as talking taxi communication boards, personal journey cards and light-writers.

The VTD introduced 'Talking Taxi Communication Boards' to assist people with disabilities catch taxis. The boards are picture-based communication tools and help drivers and passengers by reducing confusion about destinations, payments and routes.

The VTD introduced personal journey cards for passengers/carers to inform drivers of any special needs of the passenger, for example, preferred route, emergency contact and any other important information the driver should know.

Passenger safety initiatives rolled out by VTD in 2012 included a requirement for taxi driver photo ID cards for country taxi drivers, including WAT drivers. In WATs, the photo ID cards must be attached as close to the top of the windscreen to ensure passengers in the rear can identify the driver.

The VTD produced an information sheet titled, 'Carriage of Mobility Aids in wheelchair accessible taxis' which shows samples of mobility aids where passengers can remain seated and samples of mobility aids where passengers must transfer to a fixed seat in the vehicle. This sheet is provided to taxi passengers, care organisation and anyone else requiring information on the safe carriage of mobility aids in taxis.

To encourage all passengers to provide feedback on their taxi experience, the VTD produced wallet-sized cards with contact details for the VTD embossed in braille on them. These cards contained information on what information was helpful to the VTD in investigating complaints.

4.1.3 Accessibility of facilities

4.1.3.1 Train stations

Train stations that meet DSAPT and provide universal access to all passengers must include:

- accessible pathways, stairways, ramps, lifts, overpasses and underpasses to stations;
- accessible signs for entries, exits, ticketing and amenities including waiting rooms and toilets; and
- accessible maps, timetables, information and announcements at train station.

Overall, access at metropolitan railway stations is around 55 per cent of the 208 metropolitan railway stations on 15 train lines and 55 per cent of the 87 regional railway stations on 8 train lines. As a result, the metropolitan and regional train work is achieving the 2012 milestone targets under DSAPT. This progress data needs to be considered cautiously in the absence of reliable and accurate baseline data (see discussion in 4.1.4). Progress towards accessibility and compliance under DSAPT will be better informed by planned audit processes across the network that fully assess whether train facilities are accessible.

Over the last five years, the following improvements to the accessibility of the metropolitan and regional train networks have been made:

- construction of new railway stations with accessible design features, such as Cardinia Road, Lynbrook, Williams Landing, Balaclava, Tarneit and Wyndham Vale
- major upgrades to railway stations, including the North Melbourne and Frankston Station redevelopments, upgrades to Footscray, West Footscray and Sunshine stations as part of Regional Rail Link and, grade separations at Nunawading and Laburnum Stations that will make these train stations more accessible

- improvements to access at metropolitan train stations by modifying pathways and ramps and installing Tactile Ground Surface Indicators (TGSIs) at various stations across the network
- improvements to access at a number of regional train stations by resurfacing platforms, renovating toilets and installing TGSIs.

The government will continue to improve access at railway stations over the next five years under the *Accessible Public Transport in Victoria Action Plan 2013-2017*. As mentioned above, the majority of the government committed funding of \$20 million over four years will be spent on improving access to metropolitan and regional rail infrastructure.

4.1.3.2 Tram stops

There are considerable challenges to making tram stops fully accessible. Currently, 65 per cent of the 1,770 tram stops in Melbourne meet the accessibility requirements of DSAPT. However, this is a network wide figure based on the 30 DSAPT criteria and does not mean that 65 per cent of stops are fully accessible. Rather, it is a measure of partial access across the network and should be viewed with some caution. Many of these stops do not meet DSAPT boarding requirements. Only 364 of these stops (21 per cent) could be regarded as fully accessible as these are the platform and easy access stops. The majority of tram stops are kerbside access. There would be many of these stops that meet some of the DSAPT requirements but not boarding access for people who have a mobility impairment that requires a ramp or assisted access.

The government has continued to build level access tram stops over the last five years up to the current total of 364 including the following:

- Macarthur Street, East Melbourne;
- Swanston Street, Melbourne/Carlton;
- High Street, Northcote;
- Royal Children's Hospital, Parkville;
- Bridge Road, Richmond; and
- two tram stops in Flemington/Haymarket.

While the number of level access stops has increased over the last five years, a tram cannot necessarily be accessed by people with a mobility impairment. As noted above, there are only 100 low floor trams that are concentrated on six of the 29 tram routes in Melbourne. The level access stops are spread out over a number of tram routes in Melbourne. As a result, people with a mobility restriction who require a level access tram stop to board the tram will only be able to do so at certain stops on a limited number of routes. The fleet of 100 low floor trams pass level access stops on 6 tram routes in Melbourne for example:

- Route 96 - East Brunswick - St Kilda (low floor trams only) - 44 per cent level access stops; and
- Route 109 - Box Hill - Port Melbourne (low floor trams only) - 34 per cent level access stops.

The other four tram routes have a mix of low floor and high floor trams so it is not possible to accurately predict the likelihood of passengers being able to access low floor trams from level access stops. The mix of high and low floor trams on these four tram routes varies considerably.

For example, around 50 per cent of scheduled trams on Route 6 (Glen Iris) are low floor trams compared to around 30 per cent for Route 16 (Kew).

This estimate of accessibility on the above tram lines does not take into account situations where there is a boarding gap that acts as an access barrier. The ability of people with mobility impairments to board the tram at level access stops is constrained in certain situations by a boarding gap but most people will be able to independently board trams (this is discussed above). However, it should be noted that level access stops will improve access for older people who have a mobility restriction even if the tram route is serviced by high floor trams.

Despite the increase in level access stops, there are considerable challenges in constructing new stops and making the tram network more accessible. There are a significant issues associated with traffic congestion, parking availability, business and residential access and in certain situations, local business viability that make construction of level access stops difficult and complex. The process for construction can take some time in part due to consultation that is required with the community, businesses, local government and other government agencies around these issues.

There are also physical constraints in the inner city that make it difficult to construct level access stops particularly in shopping strips and narrow streets. The biggest challenge in these situations is the loss of amenity to residents and local businesses. In some cases, a level access stop will simply not be feasible or practicable. In these situations, alternative infrastructure and/or operational boarding solutions will need to be developed.

Nevertheless, there are tram stops that are prioritised for an upgrade to level access. To continue this program, the government has committed \$70 million to upgrade tram stops mainly along routes 96 and 11. A total of 63 accessible tram stops are proposed as part of the Premium Lines Project.

4.1.3.3 Buses and coach stops

Access to bus and coach stops as required by DSAPT must meet the following:

- adequate access paths to and from the bus stop;
- signage and information at the bus stop; and
- the presence of TGSIs to provide way finding to the bus stop and when boarding the bus.

Overall, access to metropolitan bus infrastructure is around 52 per cent of the 17,961 bus stops and for regional bus services, 52 per cent of 6,136 stops located around Victoria. While this achievement falls short of the DSAPT 2012 milestone, significant advances have been made to improving access to bus services since 2007.

In the last five years, there have been upgrades to 10,000 bus stops across Victoria including TGSIs installation, access paths and surface upgrades. Combined with the Bus Replacement Program, this has significantly improved access to bus services in metropolitan and regional Victoria.

The government is committed to improving access to bus services and infrastructure and has identified key outcomes in the *Accessible Public Transport in Victoria Action Plan 2013-17* aimed at improving access to bus and coach stops and interchanges.

A proportion of the \$20 million funding for public transport accessibility projects will be dedicated to upgrading bus stops and associated infrastructure in Victoria.

4.1.4 Changes to collection and reporting of data on public transport accessibility

The government plans to change the way it reports accessibility of public transport and compliance with DSAPT.

The Victorian Auditor-General's Office (VAGO) commented in 2012 in a report titled Public Transport Performance that the Department of Transport (DOT) stopped reporting detailed compliance measures against DSAPT in 2008 because there were problems with consistency and accuracy and the results did not accurately reflect changes to accessibility as perceived by public transport users.

Moreover, reporting against DSAPT compliance by category as was done in the past, does not give people in the community an accurate or informative understanding of accessibility across public transport networks and whether they can use train, tram, bus or coach services.

VAGO noted in 2012 that DOT was part way through a program of independent audits of compliance with DSAPT.

VAGO recommended that DOT (now PTV) develop and apply an evaluation framework that measures and reports on its progress in making public transport more accessible. This was to be achieved by completing independent audits of compliance and developing an evaluation framework to measure and track accessibility outcomes.

PTV accepts these recommendations and has completed a tram and metropolitan bus audit and is about to carry out a metropolitan and regional train station audit. The audit results will establish a baseline of data that assesses compliance against DSAPT and will better inform strategies and programs to improve accessibility on the public transport network. This data is expected to have a higher degree of accuracy than past reporting and will give the government and public transport users a more accurate insight into progress towards improving access and meeting DSAPT milestones.

Also, the *Accessible Public Transport in Victoria Action Plan 2013-17* will be accompanied by an Implementation Plan that outlines how priorities and outcomes from the action plan will be delivered and funded. The action plan includes a review and evaluation process that will consider:

- achievement of specific access outcomes under the action plan priorities;
- compliance with PTV's policies and procedures relating to access including those developed specifically under the action plan;
- a review of PTV practices aimed at identifying any discriminatory practices;
- audits of access to trains, trams and buses in Victoria;
- complaints by public transport users about access to the network; and
- feedback from stakeholders and public transport users particularly those with a disability or mobility restriction, about access to the public transport network.

Victoria has concerns about consistency and comparability of reporting against DSAPT milestones. As noted in the 2007 DSAPT Review², there are significant problems associated with the reporting of compliance data Australia wide:

- absence of baseline data to measure progress against DSAPT milestones;

² Allen Consulting Group, 2009, Review of Disability Standards for accessible Public Transport Final Report

- lack of consistency of reporting across jurisdictions; and
- limitations and variations to quantity and quality of data from a range of public provider and private operator sources.

While Victoria has made significant progress in establishing better baseline data to report progress against DSAPT, the government is concerned that little has changed since the last DSAPT Review and there is still no common or consistent reporting framework despite a recommendation for a national framework.

Victoria recommends that an agreed audit approach and methodology be developed at the national level to assess progress against DSAPT within and across jurisdictions. The audit methodology will be aimed at obtaining comparable baseline data on progress against DSAPT milestones.

Recommendation 4

A nationally agreed audit approach and methodology to be developed to assess progress against DSAPT within and across jurisdictions and obtain comparable baseline data.

4.2 Question 2 - 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?

4.2.1 Ramp access to railway stations and platforms

While DSAPT sets out the accessibility requirements for lifts, ramps and stairs where they are installed at new railway stations or retro-fitted into existing railway stations, it does not mandate the use of these means of access either on their own or in combination. Rather, the DDA equivalent access provisions are the key guidance on what means of access are provided at railway stations.

The government has adopted a policy that states that ramps or subways are to be installed at new or upgraded stations that are not at ground level. This policy is particularly focussed on station and platform access where there is an island platform.

This policy was adopted following concerns about access to and from platform stations and complaints that arose at station such as Laverton, Footscray and Epping. New stations at Williams Landing, Tarneit and Wyndham Vale and upgraded stations at Footscray, West Footscray and Sunshine will have ramp access and meet the technical standards of DSAPT.

As part of improving access to railway stations under the Accessible Public Transport in Victoria Action Plan 2013-17, PTV will develop a stations operational policy and an associated lifts, ramps and stairs policy to articulate how new and upgraded train stations will be made accessible.

4.2.2 Train boarding

PTV and train operator Metro, have installed raised platform ramps on some metropolitan train station platforms to allow independent boarding access to trains. Box Hill station, Newport station and some platforms at Flinders Street station are the first to have these raised platform ramps installed. The ramps are located at the front of the platform and remove the need for the driver to deploy a boarding ramp for people with a mobility restriction (wheelchair and scooter

passengers) who cannot board the train without level access. Boarding access is to the front carriage of the train.

Under the \$20 million program (over four years) to improve access to the public transport network, some of the funding will be dedicated to installing raised platform ramps at train stations.

4.2.3 Taxis

In 2007, the Taxi Industry Accreditation scheme was introduced following government legislation. Accreditation established formal accountability measures within the taxi industry for the first time. Its purpose was to facilitate the provision of safe, reliable and efficient taxi-cab services that meet reasonable community expectations.

Industry accreditation has ensured that only suitable persons hold taxi cab licences, operate taxi-cabs or permit them to be operated or provide taxi-cab network services. Accreditation also requires taxi industry participants to meet minimum service and safety standards and to provide data about their operations.

The Business and Service Standards for NSPs outline some specific conditions aimed at ensuring that WAT vehicles focus primarily on covering bookings for wheelchair and scooter users. NSPs agree to 'offer all WAT bookings to drivers as a priority'. If that booking is not accepted and is outstanding for more than five minutes, the NSP will cease to offer conventional bookings to WAT drivers who could reasonably accept the wheelchair booking.