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Disabilities Transport Access Secretariat
Road Safety and Transport Access Branch
Department of Infrastructure and Transport
GPO Box 594
CANBERRA ACT 2601

Dear Disabilities Transport Access Secretariat,

Submission to the Review of the Disability Standards for Accessible Public Transport 2002 (Transport Standards) Draft Report 2014

I am writing on behalf of the Darebin Disability Advisory Committee (DDAC). DDAC acts as an advisory body to Council on issues relating to access and inclusion for people with a disability in Darebin. DDAC is chaired by a Councillor and its membership is made up of community representatives with a disability, carers, local disability services providers, and relevant Council staff.

DDAC responded to the Issues Paper and again thanks the Department of Infrastructure and Transport for the opportunity to feed into the next stage of the review of the Disability Standards for Accessible Public Transport 2002 (Transport Standards).

Our attached submission will be addressing some of the 7 recommendations made in the Draft Report.

Again we thank you for the opportunity to be a part of this important discussion in supporting people with a disability to have equitable and dignified access to public transport in Victoria and are available to clarify any points made throughout our submission.

Yours sincerely

**On behalf of Darebin Disability Advisory Committee
Cr Gaetano Greco (Chairperson)
Mayor – Darebin City Council**

Review of the Disability Standards for Accessible Public Transport 2002 Draft Report 2014 Recommendations

Recommendation 1 — National reporting on compliance

Council supports *recommendation 1 – that the Australian Government, jointly with state and territory governments, establish a national framework for reporting on compliance by 30 June 2016*. Council identified in our submission to the Issues Paper that compliance with the Standards is not directly monitored, instead there is a reliance on ‘a mutual commitment of industry’ and people lodging complaints. Consequently this impacts on the effectiveness of the Standards and allows short cuts to be made without reproach.

Therefore, we would encourage national reporting on compliance as a mechanism to better monitor transport providers while providing better accountability to transport users.

National reporting on compliance would also provide clarity regarding the role of local government. It could provide opportunity for Local Government to have a stronger role in supporting the implementation and monitoring of the Standards. With no mention of Local Government in the current Standards, it is the onus of each individual Council to decide whether they will take an active role in advocating for and supporting the implementation of the Standards. This can result in inconsistent support, implementation, and adherence of the Standards.

Recommendation:

1. Reports of compliance are made available on a website accessible to everyone. The website could include information relating to access features provided at each station and/or stop and along each route (trains, trams and buses). More importantly it should identify access features needing to be implemented or upgraded and the corresponding standard to be adhered to. A similar example would be the My School website.

Recommendation 2 — Modernise the Transport Standards

Council fully supports the areas identified below, for modernisation under recommendation 2 – *That the Australian Government, jointly with state and territory governments, commence a process for updating and modernising the Transport Standards, to be completed by 30 June 2016*.

Amendment to Rail Standards

Council identified the boarding of trains as an issue in our last submission. There is only one boarding point for a person with a mobility aid boarding a train in Melbourne. This not only results in inequitable access to trains but also demonstrates how people with a disability, in particular people who use a mobility aid are doubly disadvantaged.

Council welcomes the recommendation to develop specific standards for trams and trains in relation to Section 8.2 ‘boarding’.

We have included an example of services provided to and for mobility aid users wanting to access ScotRail in Scotland. The notice board identifies that passenger assistance is provided at all stations, including boarding assistance, connecting services, reserved seating and train station access, all of which can be arranged in advance.



Provision of information to people with disability

Council identified this as an issue in our last submission, specifically inconsistencies in the provision of automated stop announcements on the tram network and audible and visual information options at train stations. We support the review and update of Part 27 of the Standards to be more descriptive regarding the provision of information to people with disability and include the use of new technologies.

Public transport personnel training

Council also identified disability awareness training, in our last submission, as being integral in supporting people with a disability to have equitable access to services. Training would support all facets of a contracted transport provider to understand not just the physical and environmental barriers for people with a disability but the attitudinal and communication issues that also create barriers for people with a disability in accessing services and their community.

Council therefore welcomes the recommendation of Public transport personnel training, with associated compliance reporting and licensing included as part of contractual requirements.

Ensuring Guidelines provide more definitive guidance – bus stops

Council welcomes the recommendation of more definitive guidelines relating to bus stops. We identified challenges in our last submission regarding works being completed by external contractors, which is the case for the installation and upgrade of bus shelters, completed by contractors. We provided examples of bus shelters in Darebin that were installed incorrectly by the contractor without follow up from PTV. They have since been left in their non-compliant state.

Recommendation 3 — The complaints process

In our submission to the Issues Paper Council highlighted significant gaps in the complaints process, reiterated in the Draft Report. We are therefore disappointed by *recommendation 3 - 'that the Australian Government 'consider' the concerns raised about the complaints process'*. Council would like to see the recommendation changed to 'act' on the concerns raised regarding the complaints process and include:

- Amend the legislation to allow organisations and advocacy groups to represent individual complainants in court.
- Amend the legislation so that a breach of the Transport Standards is deemed unlawful.
- Provide better information on the complaints process.

As a minimum consistent information should be listed on all websites, brochures, and complaints policies referring people to the appropriate contact when making a complaint.

Examples of good practice relating to information provision and complaints processes was found on the Metro and V Line trains websites, this included Public Transport Victoria (PTV) contact information as well as their own contact information. The V Line website in particular clearly explained their customer service charter and complaints process.

The establishment of the Public Transport Ombudsman (PTO) Scheme in 2004 provides independent dispute resolution with regard to complaints received about the Victorian public transport operators who are members of the Public Transport Operators scheme. While the PTO does not provide a consumer advocacy role, advertising the role of the PTO on public transport may go some way in keeping consumers informed of their rights.

Consider the scope for monitoring of the Standards to link into the Public Transport Ombudsman Scheme. There currently seems to be no

reference made to the Standards on their website.

Recommendation:

1. That consistent information is listed on all modes of transport and transport provider websites, brochures outlining their contact information, customer service charter and complaint policies and mechanisms, referring people to the appropriate contact when making a complaint.
2. Promoting the role of the Public Transport Ombudsman and its powers in supporting consumers with complaints across the range of modes of transport with specific reference made to the public transport operators who make up its membership (e.g. BusVic, MetroTrains Melbourne, MYKI, Public Transport Victoria, Southern Cross Station, V Line, etc.).

Recommendation 4 — Whole-of-journey accessibility

Council supports *recommendation 4 – development of accessible guidelines for a whole-of-journey approach to public transport planning by 31 December 2015*. We also welcome the recommendation that all levels of Government including Local Government should be involved in the process.

In our submission to the Issues, Paper Council identified the significant gaps that can occur for people with a disability without a whole-of-journey approach to transport. Often Standards have been implemented correctly, but due to providers not considering access beyond the defined scope of the Standards, there are gaps in the achievement of a continuous accessible path of travel. This is especially the case between different modes of transport and from transport infrastructure out into the community landscape. This can be a particular challenge for Local Government, to know where and how to fill access gaps in infrastructure and amenities in the wider community.

Recommendation:

1. Broaden the scope of the Standards to cover a continuous accessible path of travel and include access to information as an integral component to planning ones journey.
2. Incorporate a whole-of-journey approach into action plans which will support the role and contribution of local government in implementing complementary initiatives beyond the immediate limits of the Transport Standards.

Recommendation 5 — National motorised mobility aid labelling scheme

Council fully supports *recommendation 5 – the development of a national motorised mobility aid labelling scheme*. The labelling scheme would provide valuable information to mobility aid users and transport providers. Providing people with the reassurance of knowing their mobility aid is of a size and weight that will comfortably and safely be able to board and fit in an allocated spot. This would also support discrimination complaints enabling the mobility aid user and transport provider to determine whether a mobility aid is compliant with the dimensional limitations outlined.

We have included an example of information provided to and for scooter users wanting to access ScotRail in Scotland. The notice board identifies that there are national scooter guidelines for train access, it lists the approved scooter dimensions and the provision of scooter assessments by ScotRail.

Information for
SCOOTER USERS

Did you know that there are restrictions on the types of scooters that can be carried onboard the train?



Did you know that you can have your scooter assessed?

Does your scooter meet the guidelines?

The types of scooters that can be carried on ScotRail trains are those which meet the dimensions indicated below;

MAXIMUM DIMENSIONS

	Metric	Imperial
Maximum Length	104cm	41"
Maximum Width	56cm	22"
Maximum User Weight	136kgs	300lbs (21stone)
Maximum Turning Radius	99cm	39"

Examples of scooters that can be carried on trains

If you are not sure whether your scooter can be safely carried on the train, please contact **0800 912 2 901** to arrange for it to be risk assessed.

Recommendation 6 — National wheelchair accessible taxi compliance milestones

Council supports *recommendation 6 – National compliance milestones and response times for wheelchair accessible taxis (WAT) by 30 June 2015*. More WAT services and greater response times will greatly assist people who use mobility aids and taxis to more fully and consistently participate in an active life filled with education, employment, and social activities.