

28 March 2008

Ms Sharon Kennard
Allen Consulting Group
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Dear Ms Kennard

Response to Draft Report on Review of the Disability Standards for Accessible Public Transport

UnitingCare Community Options (UCCO) welcomes the opportunity to respond to the draft report. UCCO is part of the UnitingCare Australia network of community service agencies. We are a major provider of community support services in the Eastern Metropolitan Region of Melbourne, supporting some 4,000 families annually. We work with frail older people, people with disabilities, people experiencing mental illness, and their families, to identify supports that they require to enjoy normal, valued lives at home and as part of the community.

In preparing this response, UCCO circulated the draft report to its Participant Committee (an internal committee of consumers) who provided input into this report. Our consumers noted the complexity of the report and its focus on the technical standards, while making the point that accessibility is about identifying and removing barriers that make life difficult.

UCCO acknowledges the quality of the effort that ACG has expended in the conduct of this Review and the attention to detail in its recommendations. It is, however, of concern that the Review has not made any comment on the non-physical elements of accessibility, in particular the attitude and behaviour of public transport staff. Our experience, as illustrated by the example used in the Review's draft report on page 28, is that the attitude and behaviour of transport staff is instrumental to creating an environment that is welcoming and conducive to encouraging greater use of public transport. The Report notes that "confidence is an important indicator of accessibility" and concludes that "if certain characteristics of a public transport system diminish the confidence of people with disability using the service, then discrimination remains" (p. 77).

UCCO recommends that the review consider a recommendation to government that it commit resources to hasten the implementation of the standards. While acknowledging the gradual pace of implementation, the feedback from consumers as reported in the draft report, is that the pace needs to be quickened, for example, the need for 'whole of journey' accessibility, the lack of consistency in accessibility across the tram fleet for the vision impaired, the low level of compatibility of trams with tram infrastructure, with only a small number of services combining both the low-floor trams and accessible platform stops, and the insufficient number of wheelchair accessible taxis.

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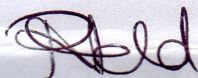
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The Review identified occasions where conflict exists between policies such as anti-discrimination and occupational health and safety or between the transport standards and industry specific regulations or design rules (for example, conflict between DDA and CASA as reported on page 64 and between Transport Standard Guidelines and Australian Design Rules for motor vehicles). Unfortunately, the recommendations and proposed consultation framework are unclear as to how this new framework will assist in addressing these conflicts.

UCCO welcomes the Review's observations about the absence of consistent and reliable compliance data and notes the recommendations to engage the ABS in data collection and the Accessible Public Transport Jurisdictional Committee in developing a mandatory reporting framework. UCCO cannot highlight sufficiently the importance of adequate reporting and compliance data as a tool to measure improvements in service usage and accessibility.

UCCO thanks the ACG for the opportunity to comment on the draft report and looks forward to the final report of the Review and to the government's response to the report.

Yours sincerely



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