

**SOUTH AUSTRALIAN
RESPONSE
TO**

**THE DRAFT REPORT OF
THE 5 YEAR REVIEW OF THE
DISABILITY STANDARDS FOR
ACCESSIBLE PUBLIC TRANSPORT 2002**

SOUTH AUSTRALIAN RESPONSE TO THE 5 YEAR REVIEW DRAFT REPORT

1) EXECUTIVE SUMMARY

South Australia is deeply committed to the provision of fully accessible transport and has an extensive history of developing and delivering improved transport services to people with disabilities (see appendix 1). South Australia looked forward to the 5 Year Review of the Transport Standards (the Standards) promoting the changes required for the effective and responsible introduction of accessible transport.

At the time the Standards were drafted, they were breaking new ground in trying to create more certainty for providers and people who use public transport. Five years on, there are undoubtedly lessons that can be learned and improvements that can be made to the Standards.

While the disability Standards were intended to clarify people's rights and responsibilities, without having to resort to complaint and litigation, neither the Federal Attorney General's office nor Human Rights and Equal Opportunity Commission (HREOC) is able to advise what constitutes compliance with the Standards. The need for recourse to the legal system to define what constitutes compliance is clearly a significant concern that the 5 Year Review needs to address.

The identification of the failure of Commonwealth Legislation to effectively address what constitutes compliance must be an outcome of a final Report to the 5 Year Review. Legislative change is clearly required to ensure that the certainty required by service providers and customers in relation to what constitutes compliance is achieved.

Given these complexities it is suggested that consideration be given to the 5 Year Review promoting the concept of modifying the Disability Discrimination Act 1992 (DDA) to recognise the concept of "Disability Compliance Plans" that can be developed in conjunction with state government, industry and representatives from the disability sector. It is suggested that a "Disability Compliance Plan" could be held by HREOC and be reported against annually. It is envisaged that a "Disability Compliance Plan" backed up with modal specific codes of practice could be developed around the existing Standards and modified to reflect local issues and legislative responsibilities congruent with State and Territory Equal Opportunity Legislation.

A "Disability Compliance Plan" would clearly set out how accessible transport would be achieved and what would constitute compliance and would cover the following areas:

- What is covered
- Consultation
- How compliance is achieved
- How it is measured
- How it is reported
- Legislative compliance
- How non compliance is addressed
- Funding
- Implementation timeframe
- Priority setting

- Complaints resolution

Establishment of a system for the approval of compliance in each of the states and territories is needed in relation to the Standards. It is suggested that such a system could operate in conjunction with the existing building control authorities that are empowered to approve technical compliance under the building code.

South Australia's proposed approach is intended to promote greater adherence to a nationally consistent framework and reduce regulatory administrative and compliance costs associated with implementing the standards.

The Standards issued in October 2002 represented the best way forward at the time. We have learnt a great deal over the past 5 years from endeavouring to work with them. We need to progress and build on what has worked and what needs to be changed. Amendments are needed to the Disability Discrimination Act (1992) as the principal legislation underpinning the Standards. Other changes relate to the need for clarification and removal of ambiguity.

Failure of the Draft Report to address the requirements for change may lead to broad exemptions being sought by many organisations in order to redress the review's shortcomings and continuing confusion.

A major flaw in the Draft Report is its failure to explore the projected costs and savings that were forecast by the Australian Government's Regulatory Impact Statement (RIS) framework when the Standards were originally formulated. This should be significantly addressed in the final report to the 5 Year Review.

2) RESPONSE TO THE DRAFT RECOMMENDATIONS

These comments on the Draft Report into the 5 Year Review of the Disability Standards for Accessible Public Transport 2002 and the additional questions posed in the Draft Report are provided by relevant South Australian Departments namely, the Department for Transport Energy and Infrastructure, the Department of Education and Children's Services and the Department of Families and Community Services.

Draft Recommendation 1.

Accessible Passenger Transport Jurisdictional Committee (APTJC establish a technical committee to:

- *Review technical amendments proposed by this review.*

Response

- 1.1 The Draft Report needs to describe the technical changes proposed for amendment within a dedicated appendix.
- 1.2 A technical committee would need to have representatives from people with disabilities, industry and government. Ideally there should

be a committee in each state and territory with the authority to make determinations on compliance.

- *Consider current exemptions as amendments to the Transport Standards when they expire.*

Response

- 1.3 A process for transferring temporary exemptions from HREOC into legal requirements in the Standards needs to be described.
 - 1.4 Many people will not support exemptions being considered for transfer into legal requirements when they expire. Often exemptions involve a degree of adjustment in relation to meeting a compliance requirement that is accepted by HREOC but not by consumers. The range of community responses to the Australasian Railway Association (ARA) exemption can provide examples where the community significantly opposed changes being put forward.
 - 1.5 In essence the proposal has the potential to suggest that the group has the capacity to reframe legislation that has an impact on providers and consumers Australia-wide while the essence of an exemption may only relate to very local issues.
 - 1.6 It is recognised that consideration does need to be given to a process for ensuring that those aspects of the Standards that cannot be met or require modification can be addressed effectively.
 - 1.7 Effectively complying may not be best served by waiting for an exemption period to end before conditions associated with an exemption can be introduced as formal modification to the Standards. Practical issues related to the continuing introduction of accessible transport while new recommendations are being developed needs to be addressed in the final report.
- *Consider the feasibility of incorporating safety requirements into the Transport Standards.*

Response

- 1.8 The Standards need to address safety in the provision of accessible transport. South Australia proposes that the recommendation be altered to:

“Must develop safety measures covering the provision of accessible vehicles and the carriage of mobility aides across all modes.”

- *This group could subsequently be used to review technical issues as they arise, thus reducing the burden on the temporary exemptions process.*

Response

- 1.9 The proposed use of this group would need to recognise the complexity of issues related to dealing with the exemption process.
- 1.10 The concept of consulting with a group of technical people to consider an exemption on technical grounds is expected to often involve the people who are making the exemption application in the first place.

Draft Recommendation 2.

The exclusions for dedicated school buses be removed, and school bus services be included in the Transport Standards on a delayed compliance timeline.

Response

- 2.1 The South Australian Department of Education and Children's Services (DECS) has a longstanding and continuing commitment to the provision of accessible transport to any student that enrolls at a rural school or elsewhere where DECS provides transport of students to schools. All students are provided with transport through dedicated and planned transport services. These services are matched to the needs of students transported. No public or ad-hoc services are provided by DECS.
- 2.1 DECS policy determines that if a student (who uses a wheelchair) enrolls at a school and who wishes, and is able, to be transported on a "mainstream" school bus to school, DECS is committed (by policy) to provide an accessible vehicle and where practical, meet all other requirements of the Disability Standards.
- 2.2 In 2008, DECS provides 519 regular school bus services, predominantly in rural areas of the State which carry only students who have been approved to travel by the managing school. All students are known to the school and are collected and dropped off at designated stops. In 2008, there are 5 students who use wheelchairs in rural areas who are transported to and from schools.
- 2.3 DECS policies currently provide for all students who require transport assistance to either mainstream schools or to special schools and units. Special needs students in the metropolitan and country areas are transported by Access Cabs or other contracted services and not by public transport.
- 2.4 South Australia, therefore, does not support this recommendation because DECS school buses are used predominantly for the transportation of known students that are enrolled at the particular schools. DECS has dedicated a number of wheelchair accessible buses (including a spare capacity) for those students who require wheelchair accessibility.

Draft Recommendation 3

Amend the exclusion for community bus services to include in the Transport Standards those community services whose purpose is to service people with disability or older people.

Response

- 3.1 At a time when integration is imperative, the options provided under the Community Bus recommendation in the Review are inconsistent.

Draft Recommendation 4

Modal sub-committees be appointed by APTJC to develop Guidelines under the Transport Standards by mode of public transport. These Guidelines be developed in consultation with Accessible Passenger Transport National Advisory Committee (APTNAC).

Response

- 4.1 Guidelines by mode are already formulated. The Bus Industry Confederation (BIC) has produced and launched its guidelines in 2004. The Australian Railways Authority (ARA) is in the process of developing a Code of Practice.
- 4.2 Modal specific sub-committees need to be supported and appropriately resourced in conjunction with the Commonwealth Government and include representatives from all stakeholder groups who can ensure the identification and adoption of international best practice.
- 4.3 For the committees to work effectively the Commonwealth needs to undertake a leadership role and have a budget to resource these committees to assist compliance.

Draft Recommendation 5.

An APTJC sub-committee to develop a national scheme for labeling mobility aids based on the specifications in the Transport Standards, and establish a clearinghouse of best practice examples of accessible public transport.

Response

- 5.1 In the past a national scheme for labelling mobility aids has been extensively studied and abandoned in favour of information developed and distributed by the Accessible Public Transport National Advisory Committee (APTNAC) and Accessible Public Transport Jurisdictional Committee (APTJC).
- 5.2 The pamphlet called 'Safety Issues for Mobility Aids On Accessible Public Transport' was sent to people with disabilities, manufacturers, occupational therapists etc.
- 5.3 The draft report should make comment on the impact of this initiative or the relative strengths or weaknesses associated with this method of influencing consumer or provider behaviours. It is recognised that jurisdictions need to maintain an effective communication plan to

ensure that consumers and providers are aware of the requirements under the Standards.

- *APTJC agree individual jurisdictions to take lead in maintaining these schemes.*

Response

- 5.4 This recommendation has potentially major ongoing resource implications for operators and/or providers of public transport services, retailers and users of mobility aids which are not discussed.
- 5.5 South Australia proposes that any strategy for maintaining a labelling scheme should evolve as a result of extensive analysis, resourcing and discussion at the national level.

Draft Recommendation 6.

HREOC to be provided with powers to refer cases of breaches of the Transport Standards directly to the Federal Court.

Response

- 6.1 The development of the Standards was supposed to confer protection from complaints when followed. Currently neither the Federal Attorney General's Office, nor HREOC can provide formal advice about what constitutes compliance.
- 6.2 The requirements under the legislative document need to be clear before South Australia can support HREOC being given greater powers to ensure that all parties are clear as to what constitutes compliance.
- 6.3 There is clearly a need for processes to be in place to manage non-compliance with the Standards that promote and support a non-adversarial approach.
- 6.4 It is suggested that consideration be given to modification of the DDA in order to provide for "Certified Compliance Plans" to be developed so that where there are obvious breaches of the compliance plan, HREOC has the capacity to intervene.
- 6.5 The development of a "Certified Compliance Plan" is envisaged to work with a DDA Action Plan and would assist with resolving many issues in the first instance by clearly defining what constitutes compliance.
- 6.6 The objective of implementing legislative change should be to remove the need for individuals to go to the Federal Court to resolve issues.
- 6.7 In principle the concept of HREOC being provided with the powers to refer breaches of the Standards to the Federal Court is laudable. However, a fundamental problem with the Standards and the Draft Report is their failure to address the central issue of "what constitutes compliance" and "what constitutes a breach". Therefore it is not clear how HREOC could refer breaches.

Draft Recommendation 7.

APTJC develop a mandatory reporting framework for Commonwealth, State and Territory governments and implement the framework by end 2008.

Response

- 7.1 The complexity of issues related to reporting and monitoring does not appear to be understood.
- 7.2 The report states that "There is no standard mechanism for reporting compliance with the Standards or anybody that monitors compliance in a systemic way".
- 7.3 The proposal that APTJC develop a mandatory reporting framework has already been tried. Much of the development work was undertaken by the South Australian representative but jurisdictions could not agree on the final specifications for reporting.
- 7.4 There was considerable criticism from other stakeholders on APTNAC who were excluded from this earlier process of developing a reporting and monitoring framework.
- 7.5 The development of a Certified Compliance Plan as indicated throughout this document would require input from Government, industry and people with disabilities.
- 7.6 The development of a mandatory reporting framework needs to meet the requirements of all stakeholders. Unless all stakeholders are involved in the development of a reporting system it will not have the desired outcome.

Draft Recommendation 8.

The Australian Bureau of Statistics to include a question on public transport patronage in surveys of people with disability.

Response

- 8.1 It is suggested that the 5 Year Review consider the significant range of questions and responses already captured by the Australian Bureau of Statistics and reported under Catalog 4430.0 - Disability, Ageing and Carers, Australia: Summary of Findings, 2003 released in September 2004.
- 8.2 An extract from ABS 4403 is attached for consideration. (Appendix 2)
- 8.3 Informal advice provided by the Australian Bureau of Statistics is that further work related to a Disability, Ageing and Carers report, will be undertaken in 2008/2009.

Draft Recommendation 9.

APTNAC and APTJC agree a new consultative framework with additional responsibilities for both committees.

Response

- 9.1 The implications of additional funding required to support the increased APTJC & APTNAC committee process is projected to be relatively small in comparison to the costs associated with operating a technical committee, modal sub committees and the group working on the safe carriage of mobility devices.
- 9.2 It would be useful for the final report to indicate the level of annual funding projected to support the proposed changes.
- 9.3 The level of funding and support for the changes being proposed would require Government and Ministerial support which will need to be included in the final report for formal consideration.
- 9.4 Some modes of transport, such as airlines, are regulated by the Commonwealth and may require direct involvement from the Commonwealth to support a technical committee.
- 9.5 The need to ensure that people with disabilities, industry and governments are actively involved in contributing to all technical and modal committees is imperative whether at national or local level.

OTHER

The following questions have been posed by the Draft review

Question 1 Do you consider that this draft report has addressed the key issues of importance to the review? If not, what other issues do you consider are important to this review?

Response

- (1) It is the view of South Australia that the *Draft Review* does not address or sufficiently address the following issues:

Legislation

- (1.2) The ambiguous provisions evident in the current Standards as shown by the examples given throughout this submission. such as:
- what is a waiting area,
 - the use of the conditional words such as 'may' instead of 'must' or 'could' instead of 'should',
 - what is meant by an equivalent response time.
- (1.3) The potential for alternative regulatory and administrative strategies to achieve the required outcomes under the DDA.
- (1.4) The importance or otherwise of national consistency and the need for efficient regulatory administration (red tape reduction).

- (1.5) The current status of guidelines and the importance for them to be recognised as having legal status.
- (1.6) A process by which the Federal Attorney General or HREOC can make directions or determinations about what constitutes compliance, which can then be used for protection against complaints rather than having to take complaints to court to define what constitutes compliance.
- (1.7) The increasing cost of meeting the compliance requirements exacerbated by the ambiguity of the Standards and the subsequent need for the exemption processes and court processes to clarify issues.

Measurement

- (1.8) The relative strengths and weaknesses of the evaluation methodology used to undertake the review.
- (1.9) The complexities associated with the collection and analysis of data related to reporting on compliance.
- (1.10) The requirement under 8.1 of the Standards for a kerb to be at least 150 mm higher than the road.

Compliance

- (1.11) Problems associated with applying the alternative access provisions of the Standards.
- (1.12) The importance of compliance based on units of infrastructure as is currently required, rather than developing services around patronage.
- (1.13) The need for compliance timeframes which reflect consideration of normal replacement and upgrade strategies within each State or Territory.
- (1.14) The fundamental differences between states and territories and their capacity to meet the compliance requirements as a result of historical development and funding priorities.
- (1.15) The potential for confusion in relation to interpretation and consideration of compliance from the 1 January 2008 as a result of the dual complaint processes operating in all states and territories.
- (1.16) The appropriateness or otherwise of 100% compliance with a Standard being required in all situations e.g. Bus Stops. It is suggested that requiring operators or providers to lodge individual or blanket exemption applications in relation to bus stops which are considered impractical to make compliant requires a more appropriate methodology to resolve such issues.

- (1.17) The impact of the Draft Report's recommendations on future compliance time tables.
- (1.18) The capacity of the Standards to be applied and interpreted uniformly across all states and territories and the implications this has for transport operators and providers having to deal with a two tier complaint process.

Air

- (1.19) The inherent confusion between parts 2.9 and 3.3 of the Standards. Part 3.3 states that small aircraft are exempted from the requirement to provide equivalent access by direct assistance when the aircraft design limits manoeuvring areas for wheelchairs, while Part 2.9 requires direct assistance when an access path does not extend inside the aircraft.

- (1.20) The table of exclusions on page 108 of the draft Report states that small aircraft are covered by Part 3.3 but nowhere is its incompatibility with Part 2.9 raised.

Page 158 of the conclusions and recommendations lists Part 3.3 as requiring amendment, but not Part 2.9 which exempts small aircraft.

- (1.21) Many charter flights meet the definition of a public transport service under Part 1.23 of the Standards and should be included with the same exemption from the physical access requirements of the Standards that apply to small aircraft on Regular Passenger Transport (RPT) (scheduled) services. This is also compatible with the regulatory direction being taken by the Civil Aviation Safety Authority, which is to remove the distinction between scheduled and charter flights.

- (1.22) If all physical accessibility requirements of the Standards do not apply to small aircraft as the guidelines suggest, and the Standards are amended to clarify this, small aircraft are still not exempted from the requirement to carry mobility aids when the passenger with a disability is assisted by a carer to board the aircraft, or when the passenger is able to do so unassisted.

The carriage of mobility aids is not always possible on small aircraft either because of the physical space restraints imposed by the aircraft structure, or because of the weight-bearing performance limits of the aircraft, or because of real or perceived OHS&W dangers to staff in loading the devices.

- (1.23) Some airlines are publishing limitations in their conditions of travel. It is suggested that the final 5 Year Report should

advocate strongly for the Standards to be amended to provide passengers with disabilities with a much clearer appreciation of their extent of access to air travel. It should do so by promoting more strongly the need for reasonable limits to the dimensions and weight of mobility aids for air travel as included on page 159 of the Draft Report.

- (1.24) The appropriateness or otherwise of individual airlines deciding the extent to which they will provide direct assistance to passengers with disabilities as required by Parts 2.9 and 3.3 needs to be addressed. It can be argued that when this is purely a matter of the cost of provision of staff and equipment etc, it should not be left to the reactions of airlines to the competitive dynamics of the market, since the costs involved are either cross-subsidised by other passengers or reflected in reduced profitability. As a matter of competitive neutrality, the requirements should be made clear in the Standards.
- (1.25) The need to address the incompatibility of the Standards with safety regulations require that an operator's mandatory adherence to safety regulation does not leave it open to complaints under the DDA.

This requires proper identification of any inconsistencies between the Standards and safety regulations and correction of the Standards to resolve them. The recommendations need to effectively address this aspect of service provision across all modes.

Mobility Aids

- (1.26) The appropriateness or otherwise of excluding mobility scooters from public transport as happens in the UK. While it is acknowledged that not all mobility scooters need to be excluded it would serve to enlighten and inform readers of the final report that such issues have been considered.
- (1.27) Issues associated with passengers with disabilities making modifications to mobility aids such as the addition of sun shades and trailer hitches.

Organisation

- (1.28) The strengths and weaknesses associated with current organisational structures.
- (1.29) Since release of the draft report the structure and reporting processes associated with the Australian Transport Council, the Standing Committee On Transport and the Australian Passenger Transport Group have undergone significant revision. These changes need to be recognised and addressed by the 5 Year Review under any proposed structural changes.

Question 2 *Are there options to address these problems that the review has not considered? If so, please provide details on these options and your assessment of their costs and benefits (including supporting evidence).*

Response

- (2.1) There are many options that could be applied to addressing issues within the Standards. However, the level of analysis in relation to the relative cost benefit of options is at times highly subjective and limited. The practical administration of a wheelchair labelling system is an example of what could become a highly expensive process.
- (2.2) South Australia is of the view that the dismissal of government and industry co-regulation as a model for the future represents a significant underestimation of the potential such a model has to offer in meeting the objectives of the DDA.
- (2.3) While the Standards were developed using a specific approach to the development of regulation it is clear that significant issues are not being addressed by the 5 Year Review as indicated above.
- (2.4) The potential for consideration of innovation outside the existing model of the Standards development and compliance such as development of a Certified Compliance Plan will be welcome in the final report to the 5 Year Review.
- (2.5) The question asked above "*please provide details on these options and your assessment of their costs and benefits (including supporting evidence)*", begs the question as to why the Draft Report does not include a more formal assessment of the costs and benefits of its own recommendations.
- (2.6) The potential impact on the future of the Standards arising from technological advances.
- (2.7) The need to consider financial incentives. (for example tax incentives associated with expenditure and compliance outcomes being achieved by providers and operators of public transport services).

Question 3 *Do you have evidence to either support or refute the assessment of options in chapter 13 of this report? Evidence may include information on the relative magnitude of impacts between options.*

Response

- (3.1) The level of analysis and subsequent recommendations within the Draft Report appear very limited, which may be due to the use of the specific evaluation tools used.

Question 4 *Do you consider that implementing the draft recommendations will involve costs to government or non-government organizations? If so, please provide any estimates of these costs.*

Response

(4.1) Based on historical experience the recommendations will require considerable time before they can address and resolve the areas they are designed to address. Subsequently the costs associated with implementing the recommendations to government, industry and consumers are buried in the detail e.g:

- Costs associated with putting works on hold while new standards are agreed to or redefined.
- The continuing organisational, social and emotional costs of dealing with complaints.
- Legal costs associated with defending complaints that may be picked up by State legislation while Federal legislation remains unclear.

Question 5 *Do you consider that the criteria used in the qualitative assessment of options are appropriate? Do you have suggested changes to these criteria?*

Response

(5.1) The problem with the qualitative assessment tool used is that it fails to account for the fact that not everything can be counted, and not everything that counts can be assessed using a qualitative instrument.

Question 6 *Do you consider that the proposed framework is the best approach to implementing the recommendations from this review? If not, how could it be improved?*

Response

(6.1) For some jurisdictions the answer may be yes, while others may have significant issues related to the proposed strategies and their associated limitations.

(6.2) A fundamental issue with the Standards is that they seek to be a one size fits all model and the recommendations as presented reinforce the same concept.

(6.3) Many submissions have repeatedly stated that the one size fits all models and modes have significant limitations and the review fails to address these concerns.

- (6.4) It is the view of South Australia that the framework being presented in the draft report is not a viable approach to resolving the complexity of issues that need to be addressed. Considerable knowledge has been gained during the development and provision of accessible transport over the past 5 years that needs to be recognised and actively responded to.
- (6.5) The Standards issued in October 2002 represented the best way forward at the time. We have learnt a great deal over the past 5 years from endeavouring to work with them. We need to progress and build on what has worked and what needs to be changed.

Appendix 1

PUBLIC TRANSPORT IN SOUTH AUSTRALIA

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How Many People Travel On Public Transport?

During 2006-07 the number of passengers making trips on public transport services continued to grow with 65.021 million trips being recorded within the Adelaide Metro area.

While many people seek specific information on the number of people with disabilities travelling on public transport this can only be extrapolated from the figures based on the level of disability being reported in the community and assuming this is mirrored in the number of boardings.

Disability in South Australia

In South Australia, people self-reporting themselves as having a disability represent around 24% of the population (ABS Survey of Disability, Ageing and Carers 2003). The 2003 Survey of Disability, Ageing and Carers conducted by the ABS, estimated there were 362,100 South Australians with disabilities. An estimated 269,400 persons or 74.4% of those with a disability experienced activity restrictions in communication, mobility or self care.

The ABS figures report that most people with disabilities live in private dwellings within the community with only 17,000 people (5%) living in supported accommodation.

The implications for DTEI are that many South Australians potentially benefit from efforts being made by DTEI to remove barriers to our services and infrastructure.

Transport Infrastructure and Conveyances

Bus services in Adelaide are provided using approximately 812 buses that operate across 1,455 kms of road networks and utilise around 7,200 bus stops to pick up and drop off passengers. 64% of all buses are fully accessible.

O-Bahn buses moved around 7.7 million passengers in the 2006-07 financial year on the 12.6 kms of dedicated track.

The rail system, which operates over 120 kms of track, stops at 84 stations and uses around 94 railcars, carried around 11.6 million passengers in 2006-07 across 6 discrete lines.

The tram system currently operates on 12.3 kms of dedicated track using a combination of old and new tram cars and carried 2.4 million passengers in the 2006-07 financial year. The new fully accessible tram cars were introduced on the 9th January 2006.

Approximately 65.021 million Adelaide Metro passenger trips were made by people using public transport during the 2006-07 financial year. Based on 24% of the community who self reported themselves as having a disability, we could project that around 15 million journeys were taken by people with disabilities.

How much is spent on Public transport

The Government's commitment to the provision of public transport services can be demonstrated by the level of expenditure allocated to public transport services in South Australia. The budget for public transport services in 2007-08 is around \$294 million.

Budget expenditure for transport concessions to the travelling public in regional areas for 2007-08 is around \$6 million. Figures for the metropolitan region are linked with payments associated with operating subsidies and are therefore not available as separate figures at this time.

Plus One Companion Card

On 1 July 2005 the State Government introduced the "Plus One Free Companion Card".

The Plus One Free Companion card enables people with a range of disabilities who cannot use public transport on their own, or who cannot be trained to independently use public transport as a result of their disability, to travel with a companion at no cost to the companion.

To date 19,366 Plus One Free Companion cards have been issued.

South Australian Transport Subsidy Scheme (SATSS)

The South Australian Transport Subsidy Scheme (SATSS) was first introduced in 1987. The aim of the SATSS is to support people who, by nature of their impairment, are prevented from using public transport.

SATSS provides for transport in taxis at a subsidised rate for people who have severe and permanent impairment that limits their mobility.

Prior to 1 July 2005 a person's eligibility was decided purely on their physical disability. New eligibility criteria now assess a person's ability to use public transport across a broader range of impairments, including sensory (e.g. vision) and cognitive and intellectual impairments, which result in a person's permanent inability to use public transport.

Current SATSS Membership

89% of SATSS members live in metropolitan Adelaide further analysis reveals that 87% of all SATSS members are ambulant; and receive a 50% subsidy on taxi travel, the other 13% receive a 75% subsidy on their taxi fare up to the maximum fare limit of \$40.

SATSS expenditure for 2006-07 was \$7.625 million (this figure does not include administrative expenses or on time bonus payments).

It is expected that over 1 million subsidised taxi trips will be taken by members in 2007-08.

Access Cabs

The South Australian Government developed fully accessible taxi services in 1987 for people with disabilities. The fully accessible taxis used in the scheme, while individually owned, are operated collectively as "Adelaide Access Taxis" and managed under contract to the government (through DTEI) by Adelaide Independent Taxis.

There is currently a fleet of 84 wheelchair accessible taxis. The fleet, consisting of single wheelchair accessible taxis and vans able to fit 2 to 4 wheelchairs plus passengers, operates in Metropolitan Adelaide.

In December 2002 the Government introduced an On-Time Bonus Scheme which is paid by the Government to the Access taxi driver, for each job that has been started within 30 minutes of the customers' required time (provided a number of administrative requirements are fulfilled). In 2007 an average of 97% of jobs were commenced within 30 minutes.

Rural Services.

DTEI is responsible for coordination of passenger transport services in regional South Australia. This includes identification of needs and services to meet those needs, integration of service delivery, and assisting in the competitive tendering process for these services.

Passenger transport services in regional South Australia include provincial city bus services, route contractors, country taxis and hire cars, other providers of passenger services and community passenger networks as local coordinators of passenger services.

DTEI actively works with advocates for people with disabilities in regional areas to determine passenger transport needs for those in the community who require special consideration. This assists to design services to meet customer needs including access to day care centres, Community Options programs and other requirements.

Parking Permits for People with Disabilities

The provision of parking permits for people with disabilities is administered by DTEI and permits are issued in accordance with the following criteria.

A person:

- who is unable to use public transport because of a permanent physical impairment; and
- whose speed of movement is severely restricted because of that impairment.

Organisations that provide services including transport to at least 4 persons with disabilities may also be eligible for the issue of a Disabled Person's Parking Permit.

A Temporary Parking Permit may be issued to a person whose disability is likely to last for more than 6 months but is not permanent.

State Advisory Committee on Accessible Transport

In order to support the need for responsible and effective consultation the State Advisory Committee on Accessible Transport (SACAT) was created as a key advisory committee.

SACAT provides advice to DTEI on matters relating to the implementation, operation, and evaluation of transport services, facilities, infrastructure and initiatives related to accessibility in its broadest context.

SACAT is made up of representatives from a wide range of organisations with an interest in the provision of services to people with disabilities and is recognised as the key reference group in the development and provision of accessible transport in South Australia.

Membership of the SACAT consists of representatives drawn from the following areas:

- DeafSA
- Carers SA
- Access Cabs users
- Council on the Ageing
- Alzheimer's Australia SA
- Community Representative
- Local Government Association
- Equal Opportunity Commission
- Disability Sector representatives
- Department for Families and Communities
- Department for Transport, Energy and Infrastructure (Public Transport Division)
- Department for Transport, Energy and Infrastructure (Policy and Planning Division)
- South Australian Multicultural and Ethnic Affairs Commission
- Office of the Commissioner for Equal Opportunity
- Other organisations as identified from time to time.

The role of SACAT is central to ensuring that services are appropriate and inclusive of people with disabilities.

Appendix 2

ABS DISABILITY, AGING AND CAREERS, AUSTRALIA 4430.0 (Extract)

PERSONS WITH A DISABILITY AGED 5 AND OVER, LIVING IN HOUSEHOLDS, Disability status by Mode of transport(a)

Mode of transport and reason for last journey	Profound or severe core-activity limitation(b)	Moderate core-activity limitation(b)	Mild core-activity limitation(b)	Schooling or employment restriction	All with specific limitations or restrictions(c)	All with reported disability(d)
	'000	'000	'000	'000	'000	'000
Passenger in a motor vehicle						
Work, school or education institution	86.0	14.4	32.9	142.2	160.5	193.7
Visit general practitioner	80.3	13.1	18.8	41.9	115.8	119.5
Visit medical specialist	51.4	*8.3	15.7	34.7	78.7	81.2
Shopping	139.9	68.1	94.5	141.2	318.3	341.3
Visiting relatives or friends	83.0	38.8	42.5	92.5	181.4	201.7
Other activities	98.1	42.5	50.0	81.8	203.6	220.1
Total	538.6	185.3	254.4	534.4	1 058.3	1 157.4
Driver of a motor vehicle						
Work, school or education institution	61.7	97.2	162.1	293.5	415.7	557.8
Visit general practitioner	23.8	32.0	36.9	57.5	100.9	105.4
Visit medical specialist	*9.6	15.7	20.2	29.0	50.3	58.6
Shopping	85.7	129.3	214.5	265.7	494.3	570.2
Visiting relatives or friends	37.5	53.1	90.8	121.4	203.1	247.2
Other activities	29.8	48.1	77.9	78.3	176.2	223.7
Total	248.1	375.3	602.5	845.4	1 440.6	1 761.0
Public transport						
Work, school or education institution	22.2	11.1	26.4	68.3	83.7	111.5
Visit general practitioner	*7.0	*4.7	*7.9	11.2	21.3	22.0
Visit medical specialist	*3.3	**1.6	**1.0	*4.4	*6.6	*6.6
Shopping	*9.3	17.3	20.6	30.7	52.0	59.8
Visiting relatives or friends	*4.3	*6.2	*6.9	18.5	24.7	26.3
Other activities	*5.4	*8.2	14.4	17.5	32.1	39.1
Total	51.6	49.2	77.2	150.6	220.4	265.2
Walked or other						
Work, school or education institution	29.1	*8.9	21.8	63.3	78.2	98.3
Visit general practitioner	*10.2	*5.2	*3.2	12.8	23.9	26.0
Visit medical specialist	*7.4	**2.1	**0.3	*3.5	10.4	10.4
Shopping	27.2	26.7	36.4	48.6	98.4	115.7
Visiting relatives or friends	14.3	12.3	18.5	28.9	51.3	54.5
Other activities	16.5	15.7	19.4	24.7	55.9	64.5
Total	104.7	70.9	99.6	181.9	318.1	369.3
Did not make a journey in the last fortnight	67.5	13.1	18.4	36.6	103.0	106.8
Does not leave home	28.0	*2.7	**1.4	10.5	33.9	34.1
Total(e)	1 038.6	696.4	1 053.6	1 759.4	3 174.4	3 727.1

* estimate has a relative standard error of 25% to 50% and should be used with caution

** estimate has a relative standard error greater than 50% and is considered too unreliable for general use

(a) For last journey made in previous fortnight.

(b) Core activities comprise communication, mobility and self care.

(c) Total may be less than the sum of the components as persons may have both a core-activity limitation and a schooling or employment restriction.

(d) Includes those who do not have a specific limitation or restriction.

(e) Total includes persons with a 'Non-restricting disfigurement or deformity' only. See Glossary.

PERSONS WITH A DISABILITY AGED 17 AND OVER, LIVING IN HOUSEHOLDS, Disability status by Use of private transport

	<i>Profound core-activity limitation(a)</i>	<i>Severe core-activity limitation(a)</i>	<i>Moderate core-activity limitation(a)</i>	<i>Mild core-activity limitation(a)</i>	<i>Schooling or employment restriction</i>	<i>All with specific limitations or restrictions(b)</i>	<i>All with reported disability(c)</i>
	'000	'000	'000	'000	'000	'000	'000
Has a current driver's licence							
Drives daily	19.6	192.0	346.1	574.0	824.6	1 358.8	1 697.5
Drives at least once a week	29.7	120.1	155.5	202.1	271.1	544.3	607.5
Drives at least once a month	*8.8	19.9	13.6	17.2	35.0	63.0	67.1
Drives at least once a year	*7.5	*8.1	*8.0	11.5	19.7	38.6	42.4
Does not drive at all	41.7	21.4	21.7	20.0	51.0	111.9	114.5
<i>Total</i>	<i>107.3</i>	<i>361.5</i>	<i>544.9</i>	<i>824.8</i>	<i>1 201.5</i>	<i>2 116.6</i>	<i>2 528.9</i>
Does not have a current driver's licence							
Not asked or does not leave home	224.4	170.8	133.0	172.9	307.1	751.6	843.1
	24.4	*2.9	*2.7	**1.4	*9.9	33.3	33.5
Need for assistance with private transport							
Always needs to be driven	249.2	126.0	55.4	45.8	165.0	482.4	488.4
Sometimes needs to be driven	34.9	158.7	94.1	78.5	228.2	372.6	383.8
Does not need to be driven but has difficulty	*10.1	27.5	50.8	16.6	71.6	108.9	110.8
Need not related to disability	18.9	48.1	64.5	89.5	111.4	242.4	264.6
<i>Total</i>	<i>313.1</i>	<i>358.4</i>	<i>264.8</i>	<i>228.4</i>	<i>576.3</i>	<i>1 206.4</i>	<i>1 247.5</i>
No assistance needed							
Does not leave home	18.6	173.9	413.1	769.3	932.4	1 661.8	2 124.5
	24.4	*2.9	*2.7	**1.4	*9.9	33.3	33.5
Total	356.2	535.2	680.6	999.1	1 518.5	2 901.5	3 405.5

* estimate has a relative standard error of 25% to 50% and should be used with caution

** estimate has a relative standard error greater than 50% and is considered too unreliable for general use

(a) Core activities comprise communication, mobility and self care.

(b) Total may be less than the sum of the components as persons may have both a core-activity limitation and a schooling or employment restriction.

(c) Includes those who do not have a specific limitation or restriction.