



National Disability Services Submission: Review of the Disability Standards for Accessible Public Transport 2002

About National Disability Services

National Disability Services (NDS) is Australia's peak body for non-government disability service organisations, representing more than 1100 non-government service providers. Collectively, NDS members operate several thousand services for Australians with all types of disability. NDS provides information and networking opportunities to its members and policy advice to State, Territory and Commonwealth governments. We have a diverse and vibrant membership, comprised of small, medium and larger service providers, supporting thousands of people with disability. Our members collectively provide a full range of disability services, from supported independent living and specialist disability accommodation, respite and therapy, to community access and employment. NDS is committed to improving the disability service system to ensure it better supports people with disability, their families and carers, and contributes to building a more inclusive community.

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1.0 Overview

National Disability Services (NDS) is pleased to make a submission to inform the Australian Government's 2022 Review (Review) of the Disability Standards for Accessible Public Transport 2002 (Transport Standards) and to make public transport more accessible for people with disability.

2.0 Scope of this submission

In this submission, NDS will provide feedback as to whether the Transport Standards are reducing discrimination for people with disability on public transport services. The scope of the submission will give rise to the voice of NDS members' experiences with public transport, including people with disability, their families and carers, advocates, and disability service providers. There are several challenges people have faced with using public transport, and NDS is concerned that many areas previously explored have not been addressed through the current reform process.

3.0 Policy Environment

United Nations Convention on the Rights of Persons with Disability

The United Nations Convention on the Rights of Persons with Disability (UNCRPD) aims to “promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disability.”¹ The UNCRPD prohibits discrimination against persons with disability in all areas of life, including transportation. It requires states to ensure that individuals with disability enjoy equal access to transportation services and facilities without any form of discrimination.

While the UNCRPD covers a wide range of rights, it also includes provisions that specifically address the right to transportation for persons with disability. These provisions work towards creating inclusive and accessible transportation systems. The UNCRPD enables the right to transport through the following Articles:

- Article 9: Accessibility of the UNCRPD focuses on accessibility and calls for states to take appropriate measures to ensure that persons with disability have equal access to transportation. It requires states to identify and eliminate barriers and obstacles that hinder accessibility, including in transportation facilities and services. States are encouraged to provide accessible transportation options and to ensure that persons with disability can independently use public transportation.

¹ <https://www.un.org/development/desa/disability/convention-on-the-rights-of-persons-with-disability/article-1-purpose.html>
Accessed 23 June 2023

- Article 20: Personal Mobility emphasises the right of persons with disability to personal mobility, which includes the freedom to choose their means of transportation. States are required to ensure that persons with disability have access to affordable and suitable transportation options, as well as to assistive devices, technologies, and mobility aids that can enhance their mobility and independence.
- Article 29: Participation in Political and Public Life focuses on the participation of persons with disability in political and public life. Accessible transportation is crucial in facilitating the exercise of these rights, as it enables persons with disability to attend political events, meetings, and polling stations, ensuring their full and equal participation.
- Article 30: Participation in Cultural Life, Recreation, Leisure, and Sport recognises the right of persons with disability to participate in cultural life, recreation, leisure, and sport on an equal basis with others. Accessible transportation is essential for individuals with disability to access cultural venues, recreational facilities, and sports events.

By incorporating these provisions, the UNCRPD works towards dismantling barriers and promoting equal access to transportation for persons with disability. It aims to create inclusive societies where individuals with disability can exercise their right to mobility and participate fully in social, economic, and cultural life.

Australia's Disability Strategy

Australia's Disability Strategy 2021–2031 (ADS) calls on all Australians to ensure people with disability can participate as equal members of society.²

The Strategy's vision is for an inclusive Australian society that ensures people with disability can fulfil their potential, as equal members of the community. In line with Australia's commitments under the UNCRPD, this Strategy will play a key role in protecting, promoting and realising the human rights of people with disability.

The ADS has prioritised policy and outcomes related to 'Inclusive Homes and Communities' as having appropriate housing and a community that is accessible and inclusive is central to how people with disability live, work, and socialise.

Within the Strategy it is made clear that accessible transport is essential for people with disability to participate fully in society. The policy priority also highlights the importance of other factors that contribute to accessible transport, such as access to emerging technology, point-to-point transport, proximity of transport systems,

² Department of Social Services (2021) Australia's Disability Strategy 2021-2031. Accessed 23 June 2023. <https://www.disabilitygateway.gov.au/sites/default/files/documents/2021-11/1786-australias-disability.pdf>

frequency of services, information to support the journey, and getting to and from the transport.

Transport is a key enabler of social inclusion, economic participation, and independent living for people with disability. However, many people with disability face barriers to accessing public transport, including:

- Inaccessible vehicles and stations
- Lack of accessible information and communication
- Insufficient frequency and availability of services
- High fares

These barriers can make it difficult for people with disability to get to work, school, medical appointments, and other important places. They can also isolate people from their families and friends and limit their opportunities to participate in social and recreational activities.

Accessible transport is not just about providing physical access to vehicles and stations. It is also about ensuring that people with disability have the information and support they need to get around.

By making transport more accessible, we can create a more inclusive society where everyone has the opportunity to reach their full potential.

“Broadly speaking, public transport accessibility has improved, incrementally, since the last [Disability Standards for Accessible Public Transport] review. Nonetheless, people with disability continue to experience significant disadvantage due to real public transport inaccessibility. Daily exclusion from public transport results in people with disability being shut out from their community. It restricts their ability to work; study; shop; socialise with family and friends; be engaged in recreational activities; and access vital government services.” (Disabled People’s Organisations Australia 2018).³

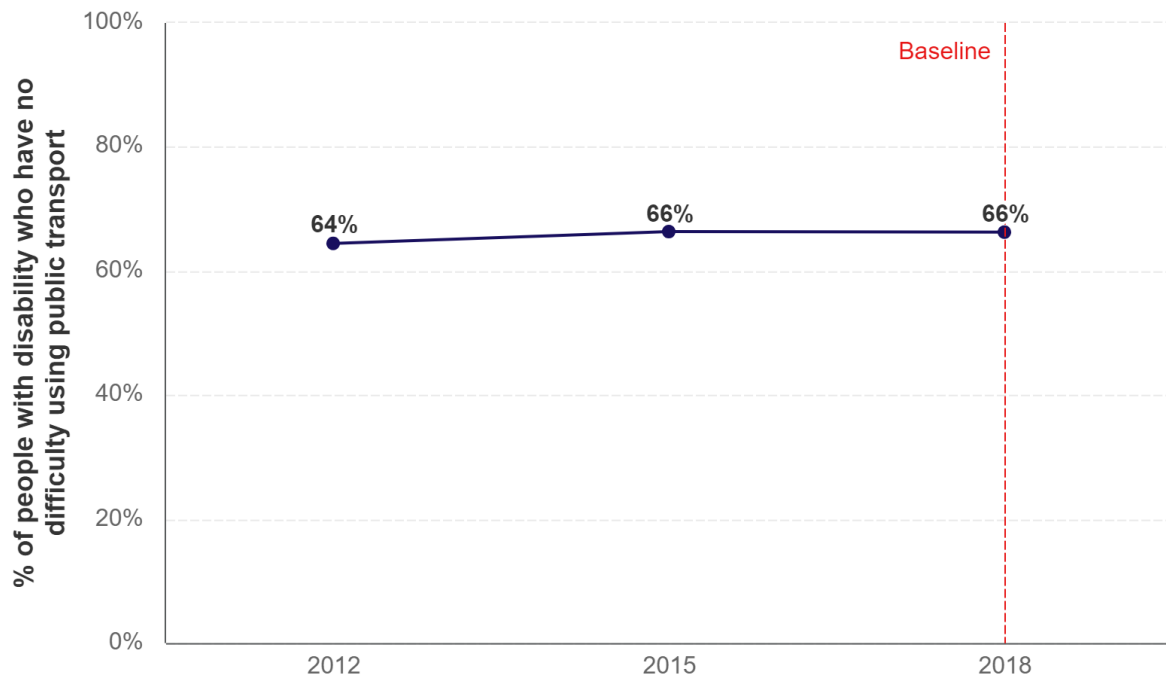
The Australian Institute of Health and Welfare⁴ have reported that 66 per cent of people with disability said they can use all forms of public transport with no difficulty in 2018. There has been relatively no change in public transport usability for people with disability over several years. The data in the graph below shows the proportion of people with disability (aged five and over) who can use all forms of public transport with no difficulty. Data from 2012 to 2018 are used. In 2018, 66 per cent of

³ Disabled People’s Organisations Australia (2018) Submission to Department of Infrastructure, Regional Development and Cities Issues Paper: Third Review of the Disability Standards for Accessible Public Transport 2002 (Transport Standards), Accessed 23 June 2023.

⁴ Australian Institute of Health and Welfare (2023) Australia’s Disability Strategy 2021–2031 Outcomes Framework: First annual report, catalogue number ADS 1, AIHW, Australian Government. Public transport usability. Accessed 22 June 2023 <https://www.aihw.gov.au/australias-disability-strategy/outcomes/inclusive-homes-and-communities/public-transport-usability>

people with disability could use all forms of public transport with no difficulty, compared with 64 per cent in 2012.

Has the proportion of people with disability who can use all forms of public transport with no difficulty increased over time?



Note: Restricted to people with disability aged 5 and over living in households who leave home.

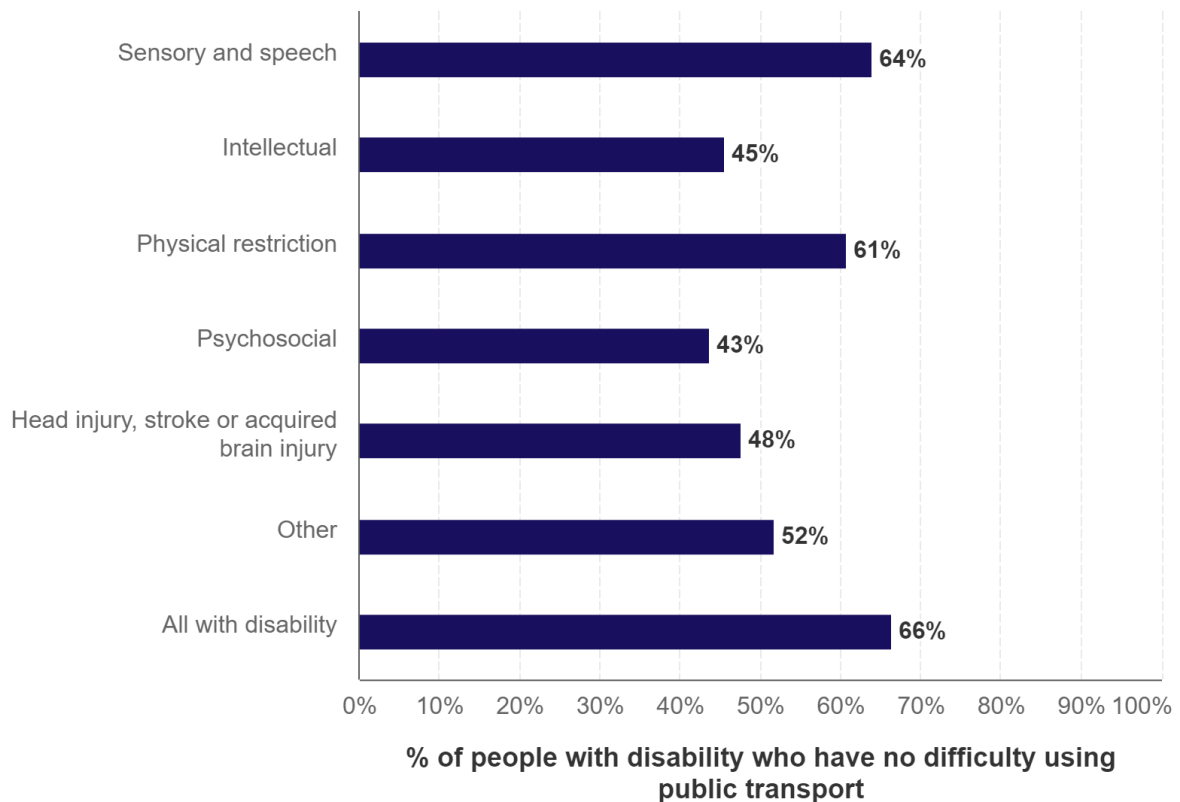
Sources:

1. ABS (Australian Bureau of Statistics) 2019. Microdata: Survey of Disability, Ageing and Carers, Australia, 2018, ABS cat. no. 4430.0.30.002, ABS, AIHW analysis of detailed microdata in DataLab, accessed 19 July 2022.
2. ABS 2016. Microdata: Survey of Disability, Ageing and Carers, Australia, 2015, ABS cat. no. 4430.0.30.002, ABS, AIHW analysis of detailed microdata in DataLab, accessed 19 July 2022.
3. ABS 2013. Microdata: Survey of Disability, Ageing and Carers, Australia, 2012, ABS cat. no. 4430.0.30.002, ABS, AIHW analysis of detailed microdata in DataLab, accessed 19 July 2022.

The data in the graph below shows the proportion of people with disability (aged five and over) who can use all forms of public transport with no difficulty, by disability group. In 2018, 64 per cent of people with sensory and speech disability could use all forms of public transport with no difficulty, compared with 43 per cent of people with psychosocial disability.⁵

⁵ Australian Institute of Health and Welfare (2023) Australia's Disability Strategy 2021–2031 Outcomes Framework: First annual report, catalogue number ADS 1, AIHW, Australian Government. Public transport usability. Accessed 22 June 2023 <https://www.aihw.gov.au/australias-disability-strategy/outcomes/inclusive-homes-and-communities/public-transport-usability>

Does the proportion of people with disability who can use all forms of public transport with no difficulty vary by disability group?



Notes:

1. Restricted to people with disability aged 5 and over living in households who leave home.
2. Components will not add to total as people may report impairments related to more than one disability group. In such cases, people are counted separately for each disability group but are only counted once in the aggregated total.

Source: ABS (Australian Bureau of Statistics) 2019. Microdata: Survey of Disability, Ageing and Carers, Australia, 2018, ABS cat. no. 4430.0.30.002, ABS, AIHW analysis of detailed microdata in DataLab, accessed 29 September 2022.

Inclusion is the process of ensuring that everyone, regardless of their abilities, can participate fully in society. This means that people with disability should have the same opportunities as everyone else to access education, employment, healthcare, and other essential services, such as transport.

Disability Standards for Accessible Public Transport 2002

The [Disability Standards for Accessible Public Transport 2002](#) (Transport Standards) were established to ensure that people with disability can access public transport services without discrimination. The Transport Standards apply to train, tram, bus and coach, ferry, taxi, and aviation services. They set out requirements for public transport operators and providers to make their services accessible.

The Transport Standards require all of Australia's public transport networks and associated infrastructure to be fully accessible by the end of 2022 (except for trains and trams, who are required to be compliant by 2032). Under the Disability Discrimination Act 1992 (DDA), it is unlawful not to comply with the Transport Standards.

The Transport Standards are an important step towards ensuring that people with disability can participate fully in society. They provide certainty to providers and operators of public transport services and infrastructure about their responsibilities under the Disability Discrimination Act 1992. By making public transport more accessible, the Transport Standards help to break down barriers and create a more inclusive society.

4.0 Relevant Issues

People with disability need access to public transport to participate in the community.

Accessible public transport is essential for some people to get around. However, 1 in 7 (15 per cent or 345,000) Australians with disability aged 5–64, who leave home, do not have public transport available in their area. A further 1.1 per cent (or 26,000) do not know if public transport is available in their area.⁶

Large differences in the likelihood of finding it difficult to use public transport occur between people with severe or profound disability (40 per cent or 197,000) and other people with disability (8.4 per cent or 129,000). More than one-quarter (27 per cent or 132,000) of those with severe or profound disability are unable to use public transport at all, compared with 1 in 17 (5.8 per cent or 90,000) other people with disability.⁷

For people with disability, this also differs by remoteness. Around 1 in 12 (8 per cent or 108,000) people aged 15–64 with disability living in major cities are unable to use public transport at all, compared with 1 in 7 (14 per cent or 69,000) living in Inner regional areas and 1 in 4 (23 per cent or 44,000) living in outer regional and remote areas.⁸

When adequately applied and effectively observed, the Transport Standards help people with disability to travel to work or study, connect with family, friends, and their

⁶ Australian Institute of Health and Welfare (2022) People with disability in Australia 2022, catalogue number DIS 72, AIHW, Australian Government. Accessed 23 June 2023. <https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/contents/about>

⁷ Australian Institute of Health and Welfare (2022) People with disability in Australia 2022, catalogue number DIS 72, AIHW, Australian Government. Accessed 23 June 2023. <https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/contents/about>

⁸ Australian Institute of Health and Welfare (2022) People with disability in Australia 2022, catalogue number DIS 72, AIHW, Australian Government. Accessed 23 June 2023. <https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/contents/about>

community, and access healthcare services. However, when people with disability are not given equitable access to public transport, it often results in discrimination and impacts their everyday lives.

The Transport Standards set out requirements for public transport operators to make their services accessible to people with disability. However, there are still some gaps in the Transport Standards, and not all operators are compliant.

It has become evident that no state or territory is on track to meet the current deadline for making public transport accessible to people with disability. The review found that the quality and quantity of information provided by governments made it difficult to assess how close they were to complying. The Transport Standards were introduced to ensure that public transport is accessible to people with disability. However, 20 years later, many parts of the journey are still not accessible. This is because jurisdictions and asset owners have not rigorously planned, costed, and funded the work necessary to make public transport accessible. Those who develop and approve jurisdictional and industry budgets have not treated the Transport Standards with the priority it deserves.

As a result, people with disability are still facing barriers to accessing public transport.

The recent review also found that there was a lack of data on the accessibility of public transport infrastructure, including stations, platforms, and vehicles. This has made it difficult to track progress and identify areas where improvements are needed, additionally hindered by a lack of coordination between governments.

While progress has been made in incorporating accessibility into new infrastructure and major upgrades, the public transport system is complex, and it is a major undertaking to bring it all up to standard. Many projects needed to retrofit accessibility into the existing network is often considered too costly or disruptive and are therefore put on the backburner. Challenges involve:

- **Cost:** Retrofitting accessibility into existing infrastructure can be expensive. This is because it often requires major structural changes, such as widening doorways and installing lifts.
- **Disruption:** Retrofitting accessibility into existing infrastructure can also be disruptive. This is because it often requires closing stations or routes for periods of time.
- **Technical challenges:** Retrofitting accessibility into existing infrastructure can also present technical challenges. This is because it often requires finding creative solutions to fit accessible features into existing spaces.

The review made several recommendations to improve the accessibility of public transport, including:

- Collecting better data on the accessibility of public transport infrastructure.
- Improving coordination between governments.
- Setting clear targets and timelines for compliance with the Standards.
- Providing more funding for accessibility upgrades.

The review also called on the government to develop a national strategy for accessible public transport. This would help to ensure that all states and territories are working towards the same goals and that progress is being made across the country.

Recommendation: The introduction of a national accessible transport strategy focusing on ensuring that all modes of transport are accessible, including train, tram, bus and coach, ferry, taxi and aviation services.

In addition to the recommendations above, the national accessible transport strategy should also include the following:

- A commitment to collecting data on accessibility. This data will be essential to identifying and addressing accessibility gaps.
- A requirement for regular reviews of the strategy to ensure that it is meeting the needs of people with disability.
- A mechanism for people with disability to provide feedback on the strategy.

Recommendation: That governments commit to retrofitting existing public transportation infrastructure to achieve the public transport accessibility standards.

In addition to the recommendations above, consideration should also be given to:

- The cost of retrofitting existing infrastructure. This will vary depending on the specific infrastructure and the level of accessibility that is required.
- The timeline for retrofitting the infrastructure. This will need to be realistic and consider the availability of funding.
- The need for public engagement. The state should engage with people with disability and other stakeholders to ensure that the retrofitting process is done in a way that meets their needs.

4.1 Co-design with people with disability

A shift in the way we think about accessible infrastructure requires genuine co-design approach with people with disability. People with disability are the most

impacted by inaccessible public transport and have the clearest insights into how to improve it.

Benefits of co-designing accessible infrastructure with people with disability include:

- the needs of people with disability are considered from the start.
- leads to more innovative and user-friendly designs.
- helps to build trust and collaboration between people with disability and the organisations that are responsible for designing and building infrastructure.

Co-design is not always easy, but it is essential to create truly accessible network. It requires a willingness to listen to the experiences of people with disability and to be open to new ideas.

For co-design processes to be effective, it is important to:

- Start by building relationships with people with disability and getting to know their needs.
- Be open to new ideas and be willing to change your plans based on feedback.
- Provide clear and accessible communication about the co-design process.
- Make sure that people with disability have a say in all aspects of the design process, from the initial concept to the final implementation.

People with disability have been disadvantaged by not having a say in the delivery of new or refurbished assets. This is especially true when outdated, prescriptive solutions are implemented in the name of "compliance and certainty" instead of co-designing solutions that offer "function and accessibility."

The current accessibility standards do not fully reflect the diversity of disability and specific needs. By their nature, compliance standards can only ever achieve compliance, but they cannot necessarily ensure access for everyone, including:

- The Standards do not account for all types of disability. For example, they do not specifically address the needs of people with cognitive disability or sensory disability.
- The Standards are often too general. This can make it difficult to apply them to specific situations.
- The Standards do not consider the specific needs of individuals. For example, they do not allow for flexibility in how accessible features are implemented.

It is important that there is true co-design and cooperation between the government, transportation providers, disability organisations, and people with disability. It encourages people with disability to actively participate in the planning and decision-making processes for accessible transportation. This collaboration ensures that the

perspectives and needs of people with disability are considered when developing transportation policies, services, and infrastructure.

Article 3 of the UNCRPD states that "Parties shall take appropriate measures to ensure that persons with disabilities can effectively participate in decision-making processes relating to matters affecting their lives." This includes the right to participate in the design and implementation of policies and programs that affect them.⁹

The UNCRPD does not specifically mention the term 'co-design', but it does emphasise the importance of involving people with disability in decision-making processes. Co-design is a participatory approach to design that involves people with disability as equal partners in the design process.

Recommendation: Solutions should be developed through a process of co-design, which involves working with all stakeholders to identify the problems, develop solutions, and implement them.

This would be a significant investment, but it would be an investment that would pay off in the long run by improving the quality of life for people with disability and the effectiveness of government. While transport ministers have agreed to [Guiding Principles](#) to underpin the Transport Standards, measures and outcomes of effective co-design are required to provide transparency and accountability. Solutions should meet the service needs of all stakeholders and be developed through co design.

Government should also consider the following:

- The need for training and resources. Government staff need to be trained in co-design and provided with the resources they need to effectively engage with people with disability.
- The need for accountability. The government should be accountable for its commitment to co-design. This could be done by setting targets for the number of people with disability involved in the design of government services, or by publishing reports on the progress of co-design.

4.2 The importance of a 'whole of journey approach'

A key issue raised by the sector is the need for a holistic approach to the implementation of the Transport Standards. This means considering the entire journey, from pre-journey planning to post-journey support, and ensuring that all aspects of the journey are accessible to people with disability.

⁹ <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/convention-on-the-rights-of-persons-with-disabilities-2.html> accessed. Accessed 23 June 2023

One in 7 people, with disability aged five and over living in households who leave home, cannot use any form of public transport. Another 1 in 9 need help or supervision to use public transport and a further 1 in 14 can use public transport without help or supervision but have difficulty.¹⁰

A purely compliance-based approach is not enough. It is important to go beyond compliance and to think about how to make the public transport system as user-friendly and accessible as possible.

Whole-of-journey thinking is an approach to public transport planning that considers the entire journey, from start to finish. This includes the pre-journey planning, the journey itself, and the return trip. It also includes the transitions between different modes of transport, such as when you transfer from a train to a bus.

It is important because it ensures that the needs of all passengers are met. It also helps to identify potential problems and to develop solutions to minimise disruptions.

There needs to be a balance in:

- A system focus is important because it ensures that the different parts of the public transport system work together seamlessly. This includes the infrastructure, the vehicles, and the operating procedures.
- A human-centered focus is important because it ensures that the needs of the passengers are met. This includes the needs of people with disability, people with limited mobility, and people with other transport related needs.

The Transport Standards have not been able to deliver an accessible "whole of journey" outcome. This is because significant parts of the journey fall outside the jurisdiction of operators and providers of public transport services. These parts of the journey include infrastructure and premises controlled by local authorities and private entities.

The DDA covers these locations, but its complaints-driven application and lack of a Disability Standard for premises that do not have a Building Class makes regulating and upgrading these premises and locations difficult.

As a result, people with disability often face barriers to accessing public transport, even if the vehicles and facilities themselves are accessible.

The DDA is an important piece of legislation that protects the rights of people with disability in Australia. However, there are some problems with relying on the DDA to make change. One problem is that the DDA is reactive. It only comes into play after

¹⁰Australian Institute of Health and Welfare (2022) People with disability in Australia 2022, catalogue number DIS 72, AIHW, Australian Government. Accessed 23 June 2023. <https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/contents/about>

someone has been discriminated against. This means that people with disability may have to go through a lengthy and expensive legal process to get justice. Complaining is not always easy. It can be daunting to speak up against discrimination, especially when it is coming from someone in a position of power.

To make more effective change, it is important to go beyond the DDA and focus on prevention. This means creating a society where discrimination against people with disability is not tolerated. It also means ensuring that people with disability have access to the same opportunities as everyone else.

People with disability face several obstacles when using public transportation. These obstacles include:

- Poor access to stations, stops, and terminals. This can make it difficult for people with disability to board and disembark from public transportation.
- Difficulty accessing information relevant to their needs. This can make it difficult for people with disability to plan their journeys.
- Safety challenges when planning and completing a public transport journey. This can make people with disability feel unsafe or uncomfortable using public transportation.
- Reliability and frequency of accessible services (for example, taxi services in areas with low numbers of accessible vehicles).

To address the 'whole of journey approach', it is important to ensure that all parts of the journey are accessible, including infrastructure and premises controlled by local authorities and private entities. It is also important that the following are applied in consideration of how whole-of-journey thinking can be applied to public transport planning:

- Providing real-time information about the status of services. This can help passengers to plan their journeys and to avoid disruptions.
- Making sure that there are accessible facilities at all stops and stations. This includes accessible toilets, ramps, and lifts.
- Training staff on how to aid passengers with disability. This can help to ensure that passengers have a positive experience using public transport.

Recommendation: Relevant stakeholders to establish disability action plans to ensure that all components of a journey are accessible, from door to door.

This would mean ensuring that all buildings, transportation systems, and other public spaces are accessible to people with disability. It would also mean ensuring that there is adequate support available to people with disability who need it, such as accessible transportation or personal assistance services.

In addition to the recommendations above, the relevant stakeholders should also consider the following:

- The need for a comprehensive approach. The disability action plans should address all aspects of accessibility, from physical access to attitudinal barriers.
- The need for collaboration. The disability action plans should be developed in collaboration with people with disability and other stakeholders.
- The need for monitoring and evaluation. The disability action plans should be monitored and evaluated to ensure that they are effective.

4.3 Staff Training

The ability of public transport staff to offer service to passengers with disability varies. This can be due to attitudinal factors, but most of the time, it is due to a lack of disability awareness training.

Staff cannot offer first-class service if they have not received appropriate training. For example, they may not know how to communicate with passengers who are deaf, lip-reading, or have intellectual or cognitive impairments. They may also not know how to accommodate passengers with mobility aids or assistance animals.

Techniques for communicating with passengers with different disabilities should be part of induction and ongoing training. This is as important as occupational health and safety training, and it will allow staff to provide appropriate and effective direct assistance.

Disability awareness training is essential for public transport staff to ensure that they can offer the best possible service to passengers with disability. Staff training can help to increase awareness of the needs of people with disability. This includes understanding the different types of disabilities, as well as the different ways that people with disability may need assistance. Specific areas should include:

- Providing training on how to interact with people with disability: This includes being respectful and understanding, as well as knowing how to provide assistance in a way that is helpful and not patronising.
- Teaching staff how to use accessible features: This includes knowing how to operate ramps, lifts, and other accessibility features.
- Encouraging staff to be proactive: This includes being on the lookout for people who may need assistance and offering assistance without being asked.

Recommendation: Mandate regular training for all public transportation staff on how to assist people with disability and facilitate access to training through funding and resources.

This training should be co-designed and co-delivered by people with disability, so that it is relevant and effective. This would be a significant investment, but it would be an investment that would pay off in the long run by improving the quality of life for people with disability and the accessibility of public transportation for all. Relevant authorities should also consider:

- The need for a comprehensive training program. The training program should cover a range of topics, as outlined above.
- The need for ongoing training. The training should be ongoing, so that staff can stay up to date on the latest information and practices.
- The need for evaluation. The training program should be evaluated to ensure that it is effective.

4.4 Accessible information

A transport system that facilitates access must ensure that all passengers can easily and successfully find their way to their destination. Accessible information is essential for passengers to complete their journey, whether it is before or during their trip. However, many public transportation systems do not provide adequate information to passengers, especially those with disability. This can make it difficult for people with disability to use public transportation and can also lead to them being denied access to services.

Accessible information is important for people with disability on public transport because it allows them to:

- **Plan their journeys:** Accessible information about public transport can help people with disability plan their journeys. This includes knowing the routes that are accessible, the times that the services run, and the facilities that are available at each stop.
- **Make informed choices:** Accessible information can also help people with disability make informed choices about their journeys. This includes knowing which services the most accessible, and which services are the most likely to meet their needs.
- **Feel confident and independent:** Accessible information can help people with disability feel confident and independent when using public transport. This includes knowing that they have the information they need to make their

journeys, and that they will be able to get the assistance they need if they need it.

Accessible information is essential for passengers to complete their journeys. This includes information about the following:

- Transport schedules: Passengers need to know when the next bus or train is coming, so they can plan their journeys accordingly.
- Ticketing details: Passengers need to know how to buy tickets and how much they cost.
- Boarding directions: Passengers need to know where to board the bus or train and where to sit or stand.
- Disembarkation locations: Passengers need to know where to disembark the bus or train and how to get to their destination.
- Accessibility features: Passengers need to know about the accessibility features of the bus or train, such as wheelchair ramps and accessible toilets.
- Reduced walking: Passengers need to know about routes that minimize walking, such as those that connect with accessible parking or drop-off points.
- Fewest changes: Passengers need to know about routes that minimise changes, such as those that connect with direct services.
- Fastest route: Passengers need to know about the fastest route to their destination, taking into account factors such as accessibility and walking time.

Accessible information can be provided in a variety of formats, including text, audio, and visual. It is important to make sure that the information is accessible to all passengers, regardless of their disability or communication needs.

Recommendation: Relevant stakeholders to include a fully accessible web-based passenger information resource and journey planner app in jurisdictional Transport Plans.

This would ensure that all passengers have access to the information they need to use public transportation, regardless of their disability.

The app should be designed to be fully accessible to people with disability, and should include features such as:

- Text-to-speech functionality: This would allow people who are blind or visually impaired to access the information on the app.
- Large print: This would allow people who have difficulty reading small print to access the information on the app.
- Accessible maps: The app should include accessible maps that people with disability can use to plan their journeys.

- Audio announcements: The app should provide audio announcements of upcoming stops and other important information.

In addition to the digital app, the relevant stakeholders should also consider providing non-digital information resources, such as printed timetables and maps, in accessible formats. If information cannot be supplied in a passenger's preferred format, equivalent access must be given by direct assistance.

4.5 Over-reliance on NDIS

The National Disability Insurance Scheme (NDIS) was introduced in 2013 with three tiers of support: Tier 1, Tier 2, and Tier 3. Tier 1 covers all Australians with disability, Tier 2 covers people with disability who do not need an individualised support package, and Tier 3 covers people with permanent and significant disability who require individualised support.

However, when the NDIS was introduced, governments did not remove barriers to participation for the one-in-five Australians living with disability. Instead, there has been a failure to see substantial changes in the inclusive capacity of mainstream services.

However, the definition and scope of government support to Tier 2 services were diminished, with recent research demonstrating that that 90 per cent of Australians living with a disability who do not receive Tier 3 packages report are unable to access the services and support they need, including public transport.¹¹

This crisis was not caused by Australians with disability. It was caused by systemic failure. That is why we are seeing system-wide escalations in costs and why the sustainability of the Scheme is being questioned.¹²

The government needs to take steps to address this issue and ensure that all people with disability have access to the support they need, particularly around accessible transport. Questions about the availability, accessibility, affordability, and adequacy of services and support for people with disability who do not have NDIS funding, as well as the relationship between the NDIS and other key policy areas such as health, education, employment, transport, housing, and aged care need to be answered.¹³

The Mobility Allowance helps with transport costs for people aged 16 and over who have disability, illness or injury, who cannot use public transport without substantial

¹¹ D'Rosario, M. (2023), Not a one-stop shop: the NDIS in Australia's social infrastructure, National Disability Services, Per Capita, Australia. Accessed 29 June 2023. https://percapita.org.au/wp-content/uploads/2023/05/NDIS_-_Not_a_one_stop_shop-FINALv2-flattened.pdf

¹² <https://www.ndisreview.gov.au/resources/speech/everything-and-everyone-us>. Accessed 23 June 2023

¹³ Olney S, Mills, A & Fallon L (2022) The Tier 2 tipping point: access to support for working-age Australians with disability without individual NDIS funding. Melbourne Disability Institute, University of Melbourne. Accessed 23 June 2023. https://apo.org.au/sites/default/files/resource-files/2022-06/apo-nid319016_1.pdf

assistance, and who are participating in approved activities (such as studying, training, working, or looking for work).

At June 2020 around 13,500 people received the Mobility Allowance – down from 16,800 at June 2019, 32,800 at June 2018, 45,200 at June 2017 and 60,000 at June 2016.¹⁴ This support is invaluable support people with disability who regularly experience issues with accessing public transport services provided by bus, trains and trams are often relying on taxis, ride share, and other on demand services. The mobility allowance is important for people with disability because it helps them to participate in everyday activities. Without the mobility allowance, many people with disability would not be able to afford to travel, which would severely limit their ability to participate in these activities. This can lead to social isolation, decreased employment opportunities, and poorer health outcomes.

Recommendation: A commitment to the continuation of taxi user subsidy scheme, with annual indexation, for people with disability.

On-demand services provides essential transportation for people with disability who cannot use other forms of public transportation due to inaccessibility. Taxis, on the other hand, can be adapted to meet the needs of people with disability, such as providing wheelchair lifts or accessible seating.

This also ensures a rights-based approach to transportation. People with disability have the right to access transportation, just like everyone else. The taxi user subsidy scheme helps to ensure that people with disability can exercise this right.

Recommendation: Ensure that jurisdictional transport strategies, supported by the Transport Standards, provide for access to a mix of mainstream transport modes for people with disability without the need for NDIS funding.

This would mean ensuring that all buses, trains, taxis, and other public transportation services are accessible to people with disability, including those who use wheelchairs, walkers, or other mobility devices. It would also mean ensuring that there is adequate support available to people with disability who need it, such as accessible transportation or personal assistance services.

5.0 Conclusion

The benefits of accessible public transport are not just for people with disability. Everyone benefits from a more inclusive and accessible transportation system.

¹⁴ Australian Institute of Health and Welfare (2022) People with disability in Australia 2022, catalogue number DIS 72, AIHW, Australian Government. Accessed 23 June 2023. <https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/contents/about>

Accessible public transport can have many benefits:

- Reduction in poverty; When people with disability have access to jobs, they are more likely to be able to support themselves and their families.
- Increased independence: Accessible public transport can help people with disability to be more independent and to participate more fully in society. They can use public transport to get to work, school, and other important places.
- Improved quality of life: Accessible public transport can improve the quality of life for people with disability. They can have more freedom and flexibility to travel, and they can feel more connected to their communities.
- Reduced isolation: Accessible public transport can help to reduce social isolation for people with disability. They can meet new people and make new friends, and they can feel more included in society.
- Economic benefits: Accessible public transport can have economic benefits for society. People with disability who are able to work are more likely to be employed, and this can boost the economy.
- Environmental benefits: Accessible public transport can also have environmental benefits. People with disability who are able to use public transport are less likely to drive cars, which can reduce air pollution and traffic congestion.

Making public transport more accessible is a win-win for everyone. It is good for people with disability, it is good for our communities, and it is good for the economy.

NDS strongly supports the ongoing review and modernisation of the Transport Standards. The Transport Standards are a set of guidelines that outline how public transport should be accessible to people with disability. NDS believes that the Transport Standards should be updated to reflect the latest advances in technology, accessibility and universal design.

At present there is insufficient funding to make public transport networks accessible to people with disability. Unless funding shortfalls are addressed, legislated accessibility targets for public transport will not be reached and networks will not be inclusive.

The Transport Standards provide governments with opportunities to significantly enhance the public transport experience of people with disability. By updating the Transport Standards, governments can make public transport more accessible and inclusive for people with disability, building their economic and social inclusion, and to assist in delivering many of the policy aspirations and outcomes of Australia's Disability Strategy.

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