

2022 Review of the Disability Standards for Accessible Public Transport 2002

In Australia, public transport operators and providers must make sure that their services are accessible. This is managed through the Disability Standards for Accessible Public Transport 2002 (the Transport Standards). The Transport Standards are made under the *Disability Discrimination Act 1992* and need to be reviewed every five years.

Between 28 February and 7 April 2023, The Social Deck supported the Department of Infrastructure, Transport, Regional Development, Communications and the Arts to hold consultations with people with disability, their families and carers and the public transport sector for the [2022 Review of the Transport Standards](#).

These consultations were designed to understand whether the Transport Standards are effectively removing discrimination for people with disability and if any changes are needed.

During this period, The Social Deck facilitated a range of activities to allow people to participate in the Review, including by:

- completing a survey for public transport users with disability
- completing a survey for public transport operators and providers
- attending a webinar
- joining a focus group or workshop.

The engagement activities were designed to prioritise lived experience and leverage expert knowledge of key stakeholder groups and industry or sector experts. The webinar and workshops were led by expert consultants with disability. Focus groups were done in partnership with disability organisations.

Participants shared their experiences and views on the following areas:

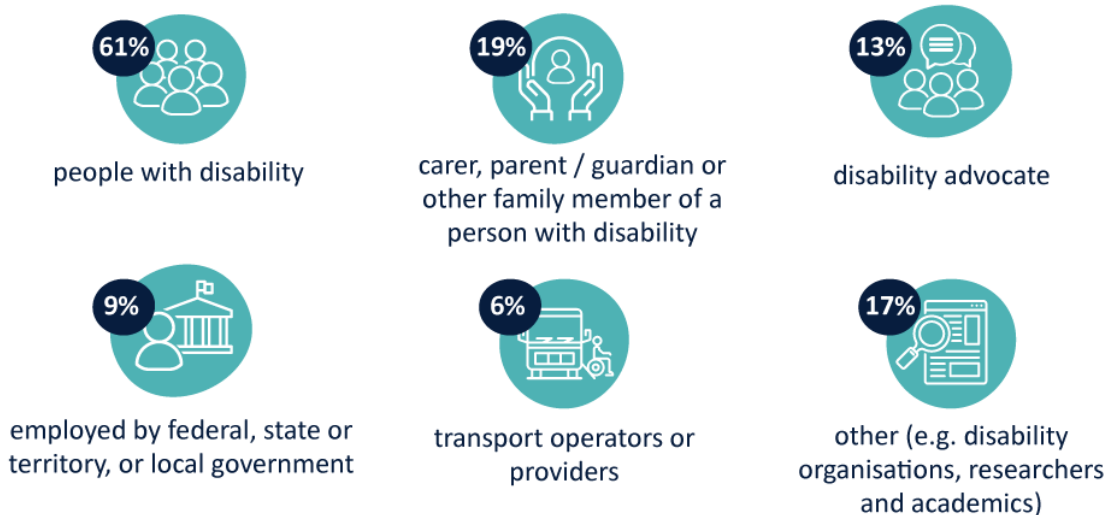
- What's improving and what needs the most work
- Awareness and understanding of the Transport Standards
- Improving the Transport Standards
- Complaints, compliance and reporting
- Working together to make sure improvements are being made

Feedback provided through these consultations, along with submissions to the review provided to the department, will be used to develop the 2022 Review Report.

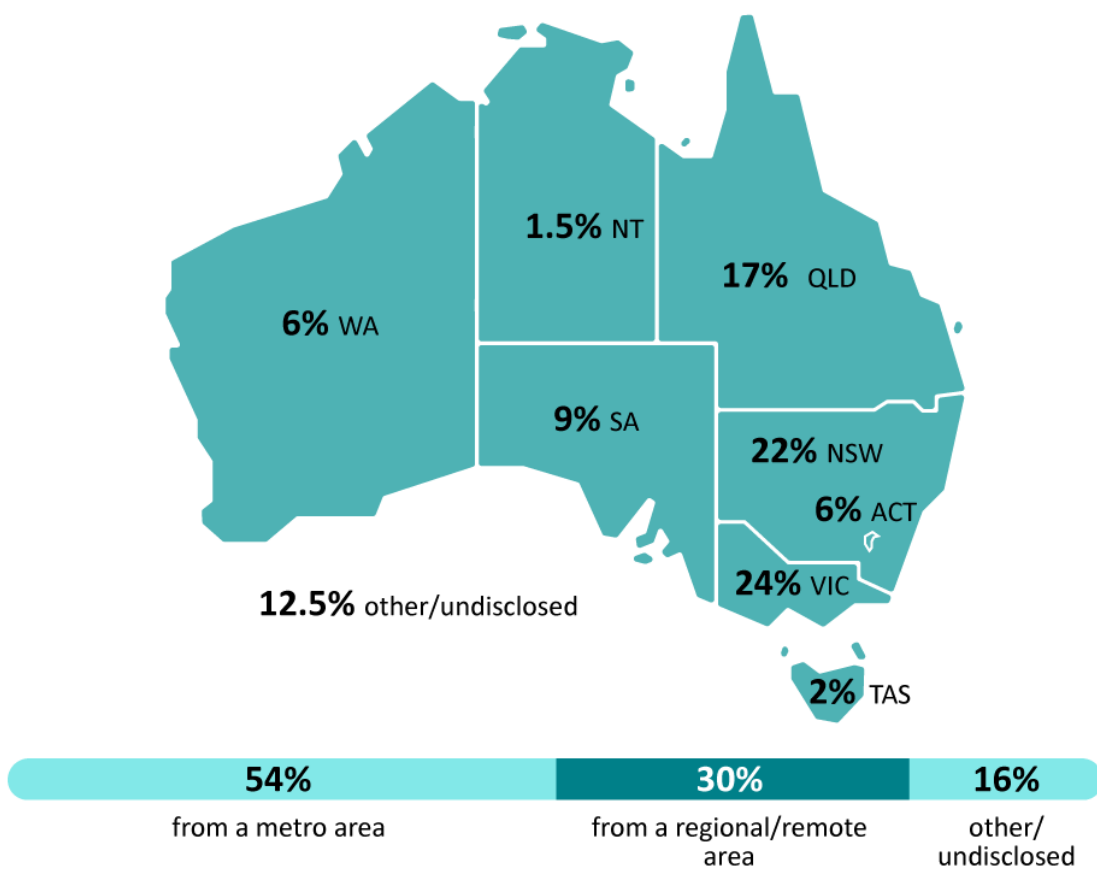
Participation data

A total of 927 people contributed to this period of consultation for the Review. This included more than **570 people with disability** who participated across the different engagement activities.

Total number of participants: 927



Participant locations



Key themes

What's improving and what needs the most work

What participants said has improved on public transport

Many participants felt that discrimination on public transport has reduced **over the last five years**. Examples of areas of improvement included:

- more inclusive infrastructure such as ramps, hydraulic lifts, allocated disability seating, toilets, and handrails
- increased consultation with people with disability as part of design processes, and more inclusive practices by transport providers and staff who understand the needs of people with disability
- increased availability of journey planning information and things like apps to map journeys and process transport payments.

'Apps like trans tracker and the PTV app which allow you to track the progress of the vehicle you're in, in real-time, seem very helpful for me with vision impairment and as I become disoriented so I can tell when to signal for disembarkation.' - User survey respondent

Relative to other modes of transport, **accessibility on trains and terminals has improved** the most for people with disability during the past five years (33% believed it has improved, 23% believed it is worse). Over a quarter of survey respondents (26%) said that accessibility on trams/light rail and stops have also improved, while 17% believed it is worse.

What participants said requires the most improvement on public transport

Participants commonly identified that the following key areas required improvement:

- **Increased transport provider training** and capability building to improve:
 - knowledge of the Transport Standards
 - understanding of the wide range of disability types and how to best support people with disability
 - the consistency of services and supports provided across modes of transport.
- **Better access to current and real-time journey information** for users, including updates about disruptions, such as when there's a delay or change in the schedule.
- **More announcements and communication in accessible formats** for different types of disability. This included audio announcements as well as having information displayed on screens.
- **Continued updates to existing infrastructure and accessibility features** at stops, stations and terminals and on board public transport.

Modes of transport

A third (33%) of respondents believed that **accessibility for taxis and ranks has gotten worse** over the past five years and only 12% said it had improved. Rideshare was also identified as an area for improvement. Of the survey respondents who had used rideshare, 40% said that accessibility had gotten worse during the past five years.

It was commonly said that this was due to lack of availability and the treatment people had received from taxi and rideshare drivers.

‘There are endless reports of taxi drivers refusing passengers with dog guides and companies and authorities seem powerless to change this’ – User survey participant

More people believed that **accessibility on buses/coaches and stops had gotten worse** (32%), than improved (19%). Common reasons for this were the continued lack of accessible services and stops, insufficient driver assistance and overcrowding/discomfort on board or getting on or off.

‘Many bus stops do not have seating or cover from the elements or ways for people with vision impairments to know when to signal for buses to stop’ – User survey respondent

Awareness and understanding of the Transport Standards

In general, **awareness of the Transport Standards** is low among people with disability, their families and carers.

- 73% of people who responded to the transport user survey had either never heard of the Transport Standards or were aware of them but had never read them.
- Most people (79%) also said they had never heard of the associated Guidelines and Whole Journey Guide.

Most **transport operators and providers are at least mostly aware of the Transport Standards** (73%), but fewer are aware of the associated Guidelines (55%) and Whole Journey Guide (50%).

Some reported that the Standards and Guidelines are not consistently being used in their workplaces. Those using the Transport Standards and Guidelines often said they used them as part of project planning, providing advice to operators and users about rights and obligations, and for training and in responding to issues.

Ideas to **improve awareness and understanding** among people with disability included:

- making sure information is in different formats including Easy Read, audio and or visual so people with disability can access them

- displaying posters, pamphlets and other notices displayed on public transport and at stations, stops and terminals
- mandatory links to the Transport Standards on provider and operator websites and social media
- more training for transport operators and providers on the Transport Standards and their responsibilities.

‘Including in the basic initial training and ongoing in-service obligations, training on their responsibilities under Australian law to provide for and accommodate disabled passengers’ – User survey respondent

Improving the Transport Standards

Common suggestions from **people with disability and their families and carers** for improving the Transport Standards and Guidelines were:

- changing the priority from minimising discrimination to designing services in ways that support people with disability
- recognition of intersectional and conflicting accessibility needs
- being clear about how they relate to other Codes and Disability Standards
- more provisions for neurodiverse people and people with intellectual disability
- updating to reflect changes in technology and ways people expect to use transport
- providing easier ways for passengers to give notice of their accessibility requirements

Common **suggestions from transport operators and providers** were:

- more information, advice and guidance on how to approach the implementation of different aspects of the Transport Standards, to ensure the most impact for people with disability
- more advice on equivalent access and unjustifiable hardship, including clearer guidance on their purpose and application of these
- information about how to manage emergency evacuations, including when access to accessible platforms or equipment is limited
- improved minimum training standards for transport operators
- make sure the Transport Standards remain up to date and reflect current practice, advancements in technology and diversity of disability types
- moving to a performance or experience-based process for measuring compliance would have a greater impact on improving the user experience, particularly if the outcomes of this were tied to funding
- consider whether some sections of the Transport Standards are out of date or too prescriptive, such as gap dimensions, and don’t necessarily translate to an improved user experience.

Complaints, compliance and reporting

Several issues regarding complaints, compliance and reporting were raised throughout the engagement activities.

- 38% of respondents to the user survey had made a complaint about a public transport operator or provider as – or on behalf of – a person with disability.

Key issues for **people with disability** about complaints most often related to how to make a complaint or how complaints were managed. The following common issues were raised:

- **Limited awareness** about how to make a complaint and who to make it to. For example, there was confusion about whether a complaint should be made to the operator or the infrastructure owner, depending on where the issue occurred
- **The complaints process is overly complicated**, onerous and time-consuming. Some people suggested it is more trouble than it's worth for people with disability to make a complaint.
- **There are often not clear or satisfactory outcomes** after someone makes a complaint. Some people suggested it's difficult to know what action, if any, was taken.

'It would probably be pretty pointless to report it - Disabled people don't have the spoons to waste making complaints that are just going to be ignored, despite chewing up their time and energy.' – User survey respondent

People with disability suggested the **need for a more nationally consistent approach** to the complaints system. For example, some states provide funding for complaints while others do not.

Two common issues raised by **transport operators and providers** about compliance and reporting were:

- Concern that reporting on compliance with Transport Standards does not adequately reflect the user experience or journey and in turn, does not support effective decision-making.
- There needs to be greater coordination between government and transport operators so that complaints can be reviewed in a centralised way and can be used to impact change.

Working together to make sure improvements are being made

People with disability and transport operators and providers agreed that **more engagement and co-design** with people with disability would have one of the greatest impacts on improving the experience of people with disability on public transport. This included continuing to consult people about the effectiveness of the Transport Standards. Specific feedback included:

- taking a co-design approach to the way the Transport Standards are implemented and measured, including involving people with disability in assessing compliance

- ensuring that people responsible for handling complaints have an appropriate understanding of disability
- providing training and involving people with lived experience to deliver this training
- continuing to involve people with disability in ongoing consultation and engagement about the Transport Standards, including the use of formal reference groups.

Common suggestions for how key stakeholders could work together to improve public transport through the Transport Standards were:

- Greater collaboration between state and territory agencies, operators, and community representatives to share knowledge and feedback.
- Adopting more nationally consistent processes and systems (this might include for funding, complaints handling and data monitoring).

Acknowledgements

We thank all participants, particularly people with disability and their families and carers, who took the time to contribute to the Review.

Acknowledgement of Country: This report was compiled on the unceded lands of First Nations peoples. The Social Deck acknowledges the traditional custodians who have lived on and cared for Country for thousands of generations, and recognises their continuing connection to land, waters and community. We pay our respects to them and their cultures, and to Elders past and present.