

MOVING PEOPLE

➤ *Operator Guidelines*

Accessible Public Transport Standards



Bus and Coach Industry
Accessible Public Transport Standards





MOVING PEOPLE

➤ *Operator Guidelines*

**Bus Industry Confederation
Accessible Public Transport
Standards Guide**

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Preface

The purpose of this Guide to Accessible Public Transport Standards under the Disability Discrimination Act (The Standards) is to provide a set of guidelines for bus and coach operators for compliance to The Standards. The Guide has been written for owner operators and appointed Directors of a bus or coach operation. As this Guide is exactly that, a guide, anyone reading this Guide needs to obtain separate advice on matters of interpretation of this Guide or contact the relevant authorities as outlined in the Guide.

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Responsibility demands commitment.

A close-up, low-key photograph of a Mercedes-Benz steering wheel and dashboard. The steering wheel features the Mercedes-Benz logo in the center. The dashboard and instrument cluster are visible in the background, with a gear shift knob in the foreground. The lighting is dramatic, highlighting the textures of the leather and plastic.

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Definitions as prescribed in The Standards

Division 1.2 Meaning of important terms¹

1.8 Purpose of Division 1.2

- (1) This Division gives the meanings for some important terms used in The Standards.
- (2) Unless the contrary intention appears, any other term that is used in The Standards and in the *Disability Discrimination Act 1992* has the same meaning in The Standards as it has in the Act.

Note See section 4 of the *Disability Discrimination Act 1992* for definitions of other relevant terms, for example **disability** and **disability discrimination**.

1.9 Access path

An **access path** is a path that permits independent travel for all passengers within public transport premises, infrastructure or conveyances.

1.10 Airport that does not accept regular public transport services

An **airport that does not accept regular public transport services** is an airport that accepts aircraft other than aircraft that operate for the purpose mentioned in paragraph 206 (1) (c) of the *Civil Aviation Regulations 1988*.

1.11 Allocated space

An **allocated space** is a three dimensional space that can accommodate a wheelchair or similar mobility aid.

1.12 Conveyance

- (1) A **conveyance** includes any of the following, to the extent that they are used to provide a public transport service:
 - (a) aircraft;
 - (b) buses or coaches;
 - (c) ferries;

- (d) taxis;
- (e) trains, trams, light rail, monorails, rack railways;
- (f) any other rolling stock, vehicle or vessel classified as public transport within its jurisdiction by regulation or administrative action of any Government in Australia.
- (2) A **conveyance** does not include the following:
 - (a) charter boats (including water taxis);
 - (b) limousines (including chauffeured hire cars);
 - (c) self-drive rental cars.

1.13 Dedicated school bus and dedicated school bus service

- (1) A bus is a **dedicated school bus** only during the time in which it is being used to provide a dedicated school bus service.
- (2) A **dedicated school bus service** is a service that operates to transport primary or secondary students to or from school or for other school purposes.

1.14 Dial-a-ride service

A **dial-a-ride service** is a service that:

- (a) is usually operated by a small bus; and
- (b) serves a local community; and
- (c) operates on flexible routes that allow passengers to be picked up and dropped off at their front doors.

1.15 Direct assistance

Direct assistance is help given by an operator or provider:

- (a) to make public transport accessible to a person with a disability when premises, infrastructure or conveyances do not fully comply with The Standards; or
- (b) to provide non-discriminatory access on request.

1.16 Equivalent access

- (1) **Equivalent access** is a process, often involving the provision of direct assistance, under which an operator or provider is permitted to vary the equipment or facilities that give access to a public transport service, so long as an equivalent standard of amenity, availability, comfort, convenience, dignity, price and safety is maintained.
- (2) **Equivalent access** does not include a segregated or parallel service.

¹ Standards Part 1



1.17 Hail-and-ride service

A ***hail-and-ride service*** is a service operated by a bus that follows set routes, but may stop for passengers at any safe point on the route.

1.18 Infrastructure

(1) ***Infrastructure*** is any structure or facility that is used by passengers in conjunction with travelling on a public transport service.

(2) ***Infrastructure*** does not include any area beyond immediate boarding points (for example, bus stops, wharves, ranks, rail stations, terminals).

1.19 Manoeuvring areas

A ***manoeuvring area*** is a space in which a wheelchair or similar mobility aid is able to turn.

1.20 Operator

(1) An ***operator*** is a person or organisation (including the staff of the organisation) that provides a public transport service to the public or to sections of the public.

(2) A public transport service may have more than one operator.

1.21 Premises

(1) ***Premises*** are structures, buildings or attached facilities that an operator provides for passenger use as part of a public transport service.

(2) ***Premises*** are a form of infrastructure.

1.22 Provider

(1) A ***provider*** is a person or organisation that is responsible for the supply or maintenance of public transport infrastructure.

(2) A ***provider*** need not be an operator.

1.23 Public transport service

(1) A ***public transport service*** is an enterprise that conveys members of the public by land, water or air.

(2) A ***public transport service*** includes:

(a) community transport conveyances that are funded or subsidised by charity or public money and that offer services to the public; and

(b) foreign aircraft and vessels that carry passengers to, from, or in Australia and that offer services to the public.

(3) A ***public transport service*** does not include a service

that provides adventure travel (for example, white water rafting, ballooning or amusement park rides), except to the extent that the service operates to move the public from one location to another distant location.

Definitions as prescribed in the Disability Discrimination Act 1992

Part 1 Section 4

disability, in relation to a person, means:

(a) total or partial loss of the person's bodily or mental functions; or

(b) total or partial loss of a part of the body; or

(c) the presence in the body of organisms causing disease or illness; or

(d) the presence in the body of organisms capable of causing disease or illness; or

(e) the malfunction, malformation or disfigurement of a part of the person's body; or

(f) a disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction; or

(g) a disorder, illness or disease that affects a person's thought processes, perception of reality, emotions or judgment or that results in disturbed behaviour; and includes a disability that:

(h) presently exists; or

(i) previously existed but no longer exists; or

(j) may exist in the future (including because of a genetic predisposition to that disability); or

(k) is imputed to a person.

To avoid doubt, a ***disability*** that is otherwise covered by this definition includes behaviour that is a symptom or manifestation of the disability.



➤ **Section I**

Overview

The Standards referred to in this Guide are the *Disability Standards for Accessible Public Transport*. These are prescribed under section 31 of the *Disability Discrimination Act (DDA)*. The Standards in turn refer frequently to *Australian Standards AS1428.1 and AS1428.2*.

Purpose of the Guide

The aim of this Guide is to provide assistance in understanding the requirements set out in the Disability Standards for Accessible Public Transport (The Standards) as applies from 2012 onwards.

It aims to provide practical advice to operators on how to meet the requirements of The Standards.

It is not a requirement of the DDA that service providers prepare and implement Action Plans but it is desirable as this will ensure that obligations are met on time and that required changes can be implemented in a structured way. For further details on the preparation of Action Plans, refer to section *Developing an Action Plan to meet The Standards* in this Guide.

The Guide is based on the relevant legislation and other appropriate source material. For those requiring more detailed information, a list of references is located at the end of the Guide. Anyone reading this Guide needs to obtain separate advice on matters of interpretation of this Guide or interpretation of the Accessible Public Transport Standards referred to in this guide, by contacting the relevant authorities as outlined in the Guide.

Structure of the Guide

This Guide outlines the requirements and deadlines in relation to accessibility on buses and coaches and in the premises and infrastructure. The *Definitions* outlined in this Guide may be a helpful reference when reading this Guide. There is also practical information relating to *Commonly Asked Questions*, *Special Considerations* and developing *Action Plans* at the back of this Guide.

Requirements of The Standards

From 23 October 2002 operators and providers were required to fully comply with the specified sections of The Standards for:

- > new premises, infrastructure and conveyances brought into use for public transport service². For example, if you are buying a new bus for route service, it must be accessible even if you exceed the accessibility targets;
- > new or revised ancillary services provided as part of the public transport operation;
- > new or updated information provided to the public³;

² Standards Part 33.1
³ Standards Part 32

- > substantially refurbished premises; and
- > replacement or additional equipment in premises and infrastructure or on conveyances.

There are provisions in the legislation for an operator to obtain relief from the Disability Standards for Accessible Public Transport by providing equivalent access via direct assistance.⁴

There are further provisions for operators to claim 'unjustifiable hardship' as a defence against a claim for unlawful discrimination.⁵

Both of these provisions are explained later in the Guide. Refer to *Equivalent Access and Unjustifiable Hardship* section in this Guide.

Who does the legislation apply to?

The DDA Standards have the following definition:-

1.23 Public transport service⁶

- (1) A **public transport service** is an enterprise that conveys members of the public by land, water or air.
- (2) A **public transport service** includes:
 - (a) community transport conveyances that are funded or subsidised by charity or public money and that offer services to the public; and
 - (b) Foreign aircraft and vessels that carry passengers to, from, or in Australia and that offer services to the public.
- (3) A **public transport service** does not include a service that provides adventure travel (for example, white water rafting, ballooning or amusement park rides), except to the extent that the service operates to move the public from one location to another distant location.

What does this mean in practice?

Route services being performed by either buses or coaches must be performed by accessible vehicles within the timeframe specified.

Dedicated school buses are currently excluded⁷ from the operation of some physical access provisions of The Standards.

Coach tours and coach express services which are being offered generally to the public, i.e. sold per seat, must be performed by accessible vehicles within the timeframe specified.

Charters which involve contracting with a group to provide a transport service are not covered by The Standards but are covered by the DDA. If that group sells tickets to the public, an accessible vehicle would be required to perform the charter.

⁴ Standards Part 33.4
⁵ Standard 33.7
⁶ Standards Part 1.23

⁷ A dedicated school bus is a bus providing a service that operates to transport primary or secondary students to or from school or for other school purposes, i.e. school charter. Standard 1.13



Bus and Coach Solutions (BCS) provide transport engineering consultancy services specialising in supplying technical support to the Australian Bus and Coach Industry for both operators and suppliers.

Bus and Coach Solutions Managing Director, Luke Hardy, was appointed Technical Manager of the Bus Industry Confederation in September 2012. Luke was previously GM Engineering at Custom Coaches and Manager Engineering Policy and Standards at the NSW State Transit Authority.

Bus and Coach Solutions fee for service:

- Surveying of bus and coach fleets to review existing door system safety standards and identify potential areas for improvement.
- Develop fleet specific door safety inspection, maintenance and training programs.
- Assist manufacturers in the design and functionality development of door safety systems, including commissioning and certification of new door systems.
- Compliance services such as PBS Vehicle Certification, ADR Compliance, certification of CNG systems for vehicle registration and Workcover purposes.
- General engineering consultancy services related to tendering, contracting, bus design, manufacturing and in-service failure investigations and project management services.

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Executive Summary

Your Purpose	To provide accessible transport and comply with the Disability Discrimination Act (DDA) and its Disability Transport standards.
Why are Standards Created?	The purpose of the Disability Standards for Accessible Public Transport (Transport Standards) is to provide a structure for planning and achievement over time of accessibility of all public transport services. The Standards were the result of extensive negotiations between governments, industry and disability community representatives. ⁸
How are Standards Enforced?	<p>If a person believes that a public transport service is failing to implement the requirements of the Disability Standards or adhere to the compliance schedule (Schedule 1, Disability Standards), the complaint may be lodged to the Australian Human Rights Commission (AHRC) by the individual or any person or group on behalf of one or more aggrieved persons. If AHRC terminates the complaint, the complainant may then make an application to the Federal Court or the Federal Magistrates Service alleging unlawful discrimination.⁹</p> <p>If the Federal Court or the Federal Magistrates Service is satisfied that there has been unlawful discrimination, the Court or the Service may make any orders it considers fit, including directing the respondent not to repeat, or continue, the unlawful discrimination and to pay damages.¹⁰</p>
Does it apply to me?	<p>If you operate route services or sell seats on a per seat basis – Yes.</p> <p>There were physical access exemptions for school bus services in the legislation as it was first released. The five year review of The Standards conducted by Allen Consulting, recommended a phased application of dedicated school bus services to physical access requirements in The Standards, commencing in 2029 and being fully required by 2044. For future planning purposes, Operators should monitor the progress of this recommendation and requirements for implementation.</p> <p>Since this document was first published Standards for Public Transport Buildings have moved under Disability Standards for Premises-Buildings which came into effect in May 2011.</p>
Are there any exemptions?	<p>There are provisions in the legislation for an operator to obtain relief from the Disability Standards for Accessible Public Transport by providing equivalent access via direct assistance.¹¹</p> <p>There are further provisions for operators to claim ‘unjustifiable hardship’ as a defence against a claim for unlawful discrimination.¹²</p> <p>Both of these provisions are explained later in the Guide. Refer to <i>Equivalent Access and Unjustifiable Hardship</i> section in this Guide.</p>
When did it start?	23 October 2002

⁸ “Public Transportfaq”, (Australian Human Rights Commission), Available: http://www.humanrights.gov.au/disability_rights/faq/Transfaq/transfaq.html (Accessed: August, 2012)

⁹ Guidelines 2002 Part 35.1

¹⁰ Guidelines 2002 Part 35.2

¹¹ Standards Part 33.4

¹² Standards Part 33.7

What are my requirements?	<p>As of 23 October 2002 all new buses, new coaches, new premises or infrastructure were required to fully comply when put into service and are not covered by the Schedule of Compliance, explained later in this Guide, and therefore are not eligible for staged upgrade of units acquired after 2002.</p> <p>There are requirements to make certain aspects (like information provision and lighting) of buses, coaches, premises and infrastructure in service in October 2002 and which remain in service, 100% compliant by 31 December 2007.</p> <p>There are further requirements, which operators must be 100% compliant with by 2012, which includes units that were in service in October 2002 and which remain in service.</p> <p>Other aspects (like ramps) have a phased implementation over a 20-year period.</p> <p>By 2022, all vehicles must be DDA compliant. Operators may consider developing a spreadsheet that relates your vehicle replacement program with the compliance framework of the DDA. This will readily show compliance levels of the current fleet and allow testing of fleet replacement scenarios to meet the 2022 requirement of 100% compliance for all trips.</p>
What should I do first?	If you have any vehicles on order, which must be accessible, check with your supplier to ensure they comply.
What's next?	<p>Review your existing fleet and fleet replacement plan to ensure that targets will be met.</p> <p>Check that your premises and infrastructure meet the Disability Standards for Premises - Buildings (guidelines are published on the Australian Human Rights Commission website and link information is provided in the References Section of this Guide).</p>
Action Planning	Develop an Action Plan to meet The Standards. An Action Plan should be presented in a clear and accessible format. An example Action Plan is shown in Appendix 1. If you already have an Action Plan, update it to meet the new set of requirements for 2012.
What are the benefits?	The beneficiaries of your accessible transport service not only accrue to people with disabilities but also include a broad section of the community, including: parents with prams; seniors with limited mobility; people travelling with shopping; business people in transit with luggage and people with temporary injuries. This will greatly add to making bus and coach services more attractive as a travel option across the community as well as provide an appealing public image of the industry.
What is meant by a disability?	The term <i>disability</i> as worded in the Disability Discrimination Act 1992, widely encompasses any person that has total or partial disability, a disorder or malfunction – physical, mental or otherwise not apparent; or is imputed to a person. An extract from the Act is provided at the beginning of this Guide in the Definitions.
What is meant by a disability aid?	<p>Disability aids include mobility, prosthetic and medical equipment. Examples of mobility aids are manual or powered wheelchairs, scooters, walkers, braces, canes and crutches. Examples of prosthetic and medical aids include hearing aids, communication devices, prostheses and breathing equipment.</p> <p>The Standards require an operator to transport any portable disability aid that a passenger carries on board and normally requires for his or her wellbeing or mobility (applies to coaches only).¹³</p>

¹³ Guidelines 2002, Part 30.1



➤ **Section 2**

Preparing for Compliance

Developing an Action Plan to meet The Standards

Meeting all of the requirements of the DDA is scheduled to take up to 20 years. For existing items, some requirements must be met completely within 5 or 10 years and those with longer implementation periods have interim targets to be met. Therefore, planning must start now.

Why have an Action Plan?

An Action Plan can assist a bus operator to:

- > Eliminate discrimination in an active way;
- > Improve services to existing passengers;
- > Enhance an operator's image;
- > Reduce the likelihood of complaints being made under the Disability Discrimination Act (DDA);
- > Increase the likelihood of being able to successfully defend complaints;
- > Increase the likelihood of avoiding costly legal action;
- > Allow for a planned and managed change to an operator's services;
- > Open up new markets and attract new consumers.

What is an Action Plan?

As advised in Section 61 of the DDA a Disability Action Plan for service providers must include:

- > A review of current practices to determine ways in which these might restrict the access of users or potential users who have disabilities;
- > The formulation of policies and programs to remove identified restrictive practices/barriers to access;
- > Goals and targets for these policies and programs;
- > Evaluation strategies;
- > The allocation of responsibility for implementation;
- > Communication strategies.

In addition, an Action Plan can only be deemed effective if it:

- > Addresses the rights of all people with disabilities;
- > Eliminates discrimination in the provision of mainstream services rather than establishing separate or parallel 'special' services;
- > Ensures equal access for people with disabilities rather than simply improving or enhancing access;
- > Addresses all barriers/restrictive practices including physical, information, communication and attitudinal barriers;
- > Shows clear evidence of consultation with stakeholders;
- > Provides for continuing consultation, evaluation and review; and
- > Is being implemented.

The Process of Preparing an Action Plan

An Action Plan for a transport service provider should cover the following five areas:

- > Information about services;
- > Physical access to services and infrastructure;
- > Complaints procedures;
- > Staff training and employment practices; and
- > Promoting positive community attitudes.

For each of these areas, a transport service provider should do the following:

- > Identify the barriers to accessibility for passengers and staff with disabilities;
- > Identify strategies to remove those barriers;
- > For each strategy, identify the resources needed to accomplish it (including human, financial or time resources);
- > For each strategy, identify the person/people/organisation positions responsible for implementation of the strategy; and
- > For each strategy, identify the timeframe for completion.

As part of the process of preparing an Action Plan, a transport service provider should ensure that consultation with the disability community is undertaken. For instance, it may be possible to include people with disabilities and their peak organisations to assist in identifying barriers and assisting in the formulation of strategies. Inclusion of people with disabilities in the Action Planning process should create a more favourable climate for the Action Plan's implementation.

An Action Plan should also include an effective evaluation, monitoring and review strategy so that the Plan remains a 'live' document and is responsive to changing circumstances and the completion of strategies. Involving the disability community in the evaluation, monitoring and review process may provide additional information about a provider's strategies and assist in improving future strategies.

Action Planning examples

An Action Plan should be presented in a clear and accessible format. Appendix one provides an example showing how each of an Action Plan's five areas might be addressed.

The size and complexity of an Action Plan varies with the size of an organisation and the complexity of its services. The Australian Human Rights Commission has indicated that, while a large organisation 'may have an Action Plan of 20 or 30 pages, a small business may well be able to address all access issues in 2 pages'.¹⁴

An Action Plan should provide for periodic updates and should indicate for what period the strategies are in place.

Action Planning Checklist

An Action Planning Checklist will enable operators to check their progress in the formulation of their Action Plans. A sample checklist is provided in Appendix 1.



¹⁴ "Developing an effective Action Plan", (Australian Human Rights Commission), Available: http://www.humanrights.gov.au/disability_rights/action_plans/Effective_Plan/effective_plan.html (Accessed: August 2012)



➤ **Section 3**

Achieving Compliance

Compliance Targets for Buses, Coaches and School Services

Developing an accessible bus or coach service that is also compliant with The Standards will require operators to purchase new vehicles and maintain a modern and accessible fleet to meet the full compliance target date of 2022. Providing accessible vehicles may present some challenges for some operators relating to carrying capacity and road surface requirements, but may also provide for a greater diversity of passenger markets and more contemporary and attractive features.

Many of the accessibility requirements for buses and coaches can only be met by purchasing new vehicles. It is not practical to retrofit old vehicles to comply with all of the requirements of The Standards.

By 2022, all vehicles must comply with The Standards. Operators should develop a spreadsheet that relates your vehicle replacement program with the compliance framework of The Standards. This will readily show compliance levels of the current fleet and allow testing of fleet replacement scenarios to meet the 2022 requirement of 100% compliance for all trips.

Dedicated school buses do not have to meet all of the physical access requirements under The Standards.¹⁵

It would be reasonable for operators to rely on the expertise of vehicle vendors to ensure that the vehicle complies with The Standards. Operators should advise the vendor prior to purchase of the requirement for the vehicle to be DDA compliant. Confirmation of compliance should be a term of the purchase contract.

Buses and coaches have different compliance targets in certain areas.

There is no definition of a coach in the legislation. Common usage indicates that a coach is a vehicle fitted with seats greater than 1 metre high. ADR 68 in turn specifies that lap-sash seat belts must be fitted.¹⁶

The Compliance Target table shows the percentage of conformance (based on quantity of services) that an operator must adhere to in The Standards.¹⁷

For example, the Compliance Target table, compliance by 31/12/2012: ALL trips undertaken by a bus or coach will need to be conducted in 100% compliant vehicles for *surfaces, handrails and grabrails*. 55% of trips undertaken by a bus or coach will need to be conducted by 100% compliant vehicles for *Ramps*.

15 Guidelines 2004 (No.2) Appendix 1, Part1

16 ADR 68 “does not apply to ‘Route Service Omnibuses’, or omnibuses with less than 17 ‘Seats’ including the driver and crew, or vehicles in which all passenger ‘Seats’ have a ‘Reference Height’ of less than 1.0 metre.”
17 The Australian Human Rights Commission (AHRC) has advised the BIC that the number of trips is the appropriate measure for bus operators.

COMPLIANCE TARGET TABLE									
ITEMS FOR COMPLIANCE	School, Bus, Coach			Standards Reference Number	PERCENTAGE OF TRIPS COMPLIANCE				
	S	B	C		31/12/07	31/12/12	31/12/17	31/12/22	
Symbols	√	√	√	16	100				
Signs	√	√	√	17	100		A trip is defined as being a "public transport service", eg. an outward journey and an inward journey would be 2 trips – unless it is a circuitous route, which would be one trip.		
Alarms ¹⁸	√	√	√	19	100				
Lighting	√	√	√	20	100				
Hearing augmentation ¹⁹	√	√	√	26	100				
Information	√	√	√	27	100				
Booked services			√	28	100				
Food and drink services			√	29	100				
Belongings			√	30	100				
Priority seating	√	√		31	100				
Surfaces		√	√	10		100			
Handrails and grabrails		√	√	11		100			
Payment of fares	√	√	√	25		100			
Access paths	√	√		2	25	55	Bus	80	100
Manoeuvring areas		√	√	3	25	55	Coach Bus	90 80	100
Ramps		√	√	6	25	55	Coach Bus	90 80	100
Boarding devices		√	√	8	25	55	Coach Bus	90 80	100
Allocated space		√	√	9	25	55	Coach Bus	90 80	100
Doorways and doors		√	√	12	25	55	Coach Bus	90 80	100
Stairs		√	√	14	25	55	Coach Bus	90 80	100
Toilets (or stops)			√	15	25	55	Coach	90	100
Controls	√	√	√	21	25	55	Coach Bus	90 80	100

Developing an accessible bus or coach service that is also compliant with The Standards will require operators to purchase new vehicles and maintain a modern and accessible fleet to meet the full compliance target date of 2022.

¹⁸ Applies only to vehicles that have emergency alarm systems fitted.

¹⁹ Hearing augmentation is only required for 10% of the bus if the PA is used for public address.

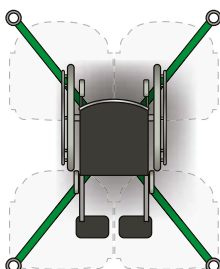
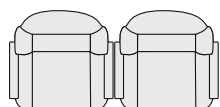
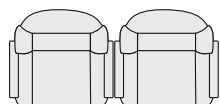
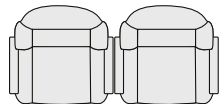
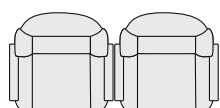
Introducing the STS QuickLock Coach Seat Mechanism

The STS system transforms a standard coach seat into an ADR compliant wheelchair, providing for the safe transfer of passengers into and out of vehicles, while at the same time meeting all regulatory requirements.

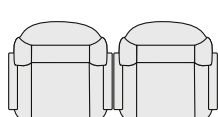
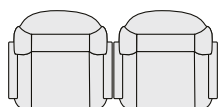
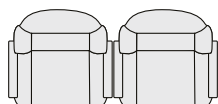
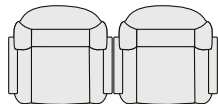
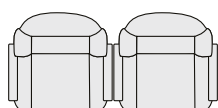
The STS system provides bus and coach operators with the tools to comply with current Federal regulations. The seat locks into and out from the coaches chassis in seconds.



Set-up A



Set-up B



In Set-up A we see the typical way that bus companies position a wheelchair in a bus. Note the straps in green. Current strapping systems are not sufficient to deal with the increased weight of today's heavy wheelchairs.

Set-up B shows how the STS coach seats have no impact on passenger capacity. The STS coach seat offers improved levels of passenger experience also. For the bus operator and driver, the function of accommodating a disabled passenger becomes very simple. The Operator loses no revenue through the removal of seats to accommodate the disabled passenger.



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Compliance Requirements for Transport of Passengers with Wheelchairs and Mobility Aids

Use of Signage and Symbols

The Standards Parts 16 and 17

International symbols for accessibility and deafness²⁰ must be used to identify accessible boarding points and where in the vehicle hearing augmentation systems work. Symbols specified in AS2899.1, General Information Signs must also be used. Signs which may be applicable include Drinking Water on Tap, Litter Bin, Smoking Prohibited and Toilet.

Signs with international symbols for accessibility must be clearly visible on the front of accessible buses (but not coaches).

The symbol must also appear outside accessible doors, accompanied by a numeral indicating the number of allocated spaces provided by the bus.

Sample Sign:
On-bus accessibility signage



Specification of Signs (Applies to buses and coaches)

The Standards Part 17

Size of Signs

Lettering on signs on the inside of buses and coaches must comply with the following size standard:

Height of Letters for Varying Viewing Distances Helvetica Medium typeface preferred	
Required Viewing Distance Metres	Minimum Height of Letters mm
2	6
4	12
6	20
8	25

Illumination of Signs

Signs in buses and coaches must be visible and interior lighting level of 200-300 lux is required and it must be placed so that unwanted reflections do not occur on the sign.

A high level of contrast is required between the letters and the background of signs. Black lettering on a white background provides maximum contrast.

Destination Signs

If used, destination signs must be placed above the windscreen and must be visible from or at boarding points.

There is no size specified for destination signs. However the Australian Standard requires lettering at least 150 mm high if a sign is to be read at a distance of 50 metres.

Industry practice for a number of years has been that the route number is not less than 200 mm in height and lettering is white or yellow on a black background.

²⁰ AS1428.1 Clause 14.3

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Alarms

The Standards Part 19

Buses and coaches do not have emergency warning systems for passengers. No obligations therefore arise under this clause.

Lighting

The Standards Part 20

The Standards require that lighting should be at least 150 lux (lumens per square metre) at the entrance and at the point where a passenger pays his/her fare and to read signs.

The BIC has continued to raise concerns that even if it were possible to achieve the 150 lux standard, it is doubtful that the eyes of drivers could adjust quickly enough after lights are dimmed to maintain normal operations.

Hearing Augmentation

The Standards Part 26

The requirement to install hearing augmentation systems only arises if the bus or coach has a public address system.

At least 10 percent of the space within the vehicle shall be serviced by such a system.

The availability of this system must be indicated by a sign at the doorway and where the system does not cover the whole vehicle, signs must define the area serviced.

Information to be Provided to Passengers

The Standards Part 27

General information about transport services should be available to passengers. This should include information about fares, concessions, timetables and accessible services.

Timetables and Other Transport Information

Large format timetables would not normally be carried on the bus but drivers would be expected to provide oral information about timetables and routes.

The information must be available from the operator or his agent. The information must be printed using at least 18 point

san serif characters like Helvetica or Arial.

The text must be in black on a light background.

Information about Location

The Standards state that "All passengers must be given the same level of access to information on their whereabouts during a public transport journey."

The main difficulty relates to providing location information to vision-impaired people. Ordinarily, passengers determine where they should get off a bus by visually recognising the destination.

It is normal practice for passengers who are not familiar with a destination to ask the driver to let them know when they have arrived at their destination. This would satisfy the requirements.

Alternatively, the driver could announce each destination over the public address system on the bus.

Ideally, an automated system which both displays and announces the current location could be provided.

Booked Services (Applies to Coaches only)

The Standards Part 28

The Booked Services provisions only apply to coaches.

Coach operators who provide a booked service have had to accommodate passengers with a disability since 31 December 2007.

Where bookings are not required, the introduction of accessible coaches can be implemented over a 20 year period.

Advance Notice

Operators may request advance notice of a requirement for accessible travel but this period can't exceed the period of notice required for other passengers.

If a passenger identifies a particular requirement in making a booking, the operator should inform the passenger fully of any relevant service options available.

Location of Carers, Assistants and Service Animals

On booked services, operators must locate carers, assistants or service animals with the passenger with whom they are travelling.

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In the case of carers or assistants, this would normally be in an adjoining seat.

If a passenger is travelling with a service animal, the animal must be able to accompany the passenger at all times and to travel without encroaching onto an access path.

Accessible seats to be available for passengers with disabilities

Accessible seats must be kept for passengers with disabilities.

Operators must allocate unbooked accessible seats to other passengers only after all other standard seats are filled.

If all seats have been booked, there is no requirement to give priority to a disabled passenger.

Food and Drink Services

The Standards Part 29

Operators and providers must ensure that any food or drink service that is provided as part of a public transport service is equally available to all passengers.

Typically the only such service in a coach might be the provision of chilled water.

Passenger Belongings (Applies to Coaches only)

The Standards Part 30

Baggage Allowance

Disability aids are to be in addition to normal baggage allowances.

Disability aids include mobility, prosthetic and medical equipment. Examples of mobility aids are manual or powered wheelchairs, scooters, walkers, braces, canes and crutches. Examples of prosthetic and medical aids include hearing aids, communication devices, prostheses and breathing equipment.

Assistance to stow or retrieve mobility aid

A passenger who needs assistance to stow or retrieve a mobility aid should be prepared to board or alight the service before or after other passengers if asked.

Priority Seating

The Standards Part 31

Operators must designate at least 2 of the seats on buses as priority seating on unbooked services for passengers with disabilities and other groups in need of special assistance (for example, the aging).

It is recommended that the seats designated be the first seat that is behind a forward facing seat. By designating this seat there is less likelihood of a disabled person slipping off the seat during braking and cornering.

Information to be provided about vacating priority seating

Operators must inform passengers that they should vacate an identified priority seat or allocated space if a passenger with a disability requires it. A sign like the one shown below is the simplest method of doing this.

Sample Sign: Priority seating



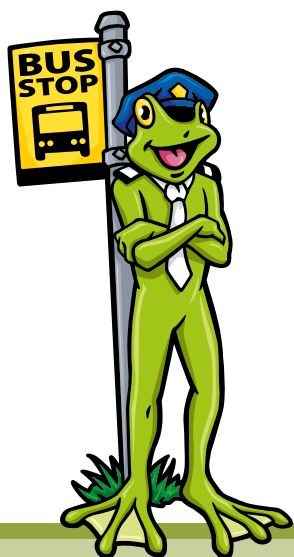
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Surfaces (Applies to Buses and Coaches)

The Standards Part 10

Floors of buses and coaches must be slip resistant.

The Standard requires compliance with AS 1428.1 Supplement 1 (1993) which provided criteria for the selection of floor surfaces. This has been withdrawn. Information about floor surfaces is available in AS 4586:1999 Slip resistance classification of new pedestrian surface materials.

Detailed requirements for carpet can be found in AS 1428.2 Clause 9. This relates to security of attachment, firmness, type of carpet, pile height and edge trimming.

ADR 58.11 requires that “Floors of omnibuses shall be finished and maintained with a skid-resistant surface...”

Therefore, in practice The Standards does not impose any additional requirements with respect to buses and coaches.

Handrails and Grabrails

The Standards Part 11

A **handrail** is a rail used to assist in continuous movement, like a rail mounted on the ceiling and going down the length of the bus.

A **grabrail** is to provide steadying or stabilizing assistance. They may be vertical like the rails which go from floor to ceiling of a bus or may be mounted on the top of a seat and go to the ceiling. Other examples of grabrails are those in wheelchair spaces.

ADR 58.10 requires that “Omnibuses shall be provided with a suitable number of hand straps, hand rails or hand grips for the convenience and safety of passengers.”

The main provisions of The Standards are:

- > a grabrail or handrail must be provided where passengers are required to pay fares;
- > grabrails must be provided in allocated spaces;
- > handrails are to be installed where there are steps; and
- > handrails and grabrails must comply with Australian Standards.

AS 1428.1 Clause 6 and AS 1428.2 Clause 10 outline the requirements in relation to handrails and grabrails. The key requirements are:

- > they shall not rotate in their fittings;
- > the cross section of handrails shall be circular and between 30 and 50 mm;
- > grabrails shall be between 30 and 40 mm outside diameter (not necessarily circular);
- > clearance between the rail and an obstruction shall be not less than 50 mm.
- > handrails and grabrails would normally be colour contrasted with their background and should not intrude into the minimum accessible path of travel.

Payment of Fares

The Standards Part 25

Fare payment and ticket validation systems

Clause 25.2 (2) states:-

For passengers who have difficulties with standard fare payment systems, operators and providers must offer a form of payment that meets equivalent access principles. Refer to sections 33.3 to 33.5 in The Standards, relating to equivalent access.

In most cases compliance with this requirement will not be a problem as ticketing systems are usually fairly basic and are operated by the driver.

Vending machines

Vending machines are rarely if ever used on buses but if they are they must comply with AS 1428.2 which deals with height, controls and illumination of vending machines.



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Compliance Requirements for Premises and Infrastructure

Since this document was first published in 2003, Standards for Public Transport Buildings have moved under Disability (Access to Premises – Buildings) Standards which came into effect in May 2011.

The purpose of the Disability (Access to Premises-Buildings) Standards is to improve the accessibility of public buildings. The Standards are part of the Australian Government's social inclusion agenda to give all Australians, particularly people with disability, better access to a wider range of public buildings. Improved building access enhances opportunities to access employment, education and services, and to connect with the broader community.

The Premises Standards is part of the Australian Government's ten-year National Disability Strategy. A significant part of the National Disability Strategy's vision is of a society with inclusive and accessible communities.

A full guide to complying with the Disability (Access to Premises – Buildings) Standards is available at the following link:
http://www.humanrights.gov.au/disability_rights/standards/PSguide.htm.

Compliance Requirements for Bus Stops

Bus stops are treated separately to other infrastructure in the compliance schedule so that providers can upgrade all components of a particular bus stop at the one time.

A full guideline for promoting compliance of bus stops with the Disability Standards for Accessible Public Transport, including a checklist for compliance, is available at the following link:
http://www.humanrights.gov.au/disability_rights/standards/AHRC_Bus_Stops_Guidelines_November_2010.htm.



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Manoeuvring Areas

The Standards Part 3

3.2 (1) bus only

Passengers in wheelchairs/mobility aids must be able to enter/exit bus and position aids in allocated space.

3.2 (2) bus only

If this is not practicable, operators must provide equivalent access by direct assistance.

3.3 coach only

If the design restrictions of a coach limit on-board maneuvering areas for wheelchairs and similar aids, the operator of the coach must ensure equivalent access by direct assistance to passengers.

Ramps

The Standards Part 6

6.2 A boarding ramp must comply with AS/NZS3856.1 (1998) Clause 2.1.8:

(b) When two or more ramps are deployed, they shall be attached securely to one another,

(c) The surface of the ramp shall have a slip-resistant finish. The surface shall be an acceptable surface when tested in accordance with AS 3696.13.

Note: Cleats may be provided to assist an attendant using the ramp.

(f) A ramp shall have no protrusions extending for more than 6 mm above the surface except when cleats are chosen as an option, and

(g) When the ramp is deployed, there shall be no opening or gap in the ramp more than 40mm.

6.3 Minimum allowable width of a ramp is 800 mm.

6.4 (a) Slope of an external boarding ramp must not exceed: 1 in 14 for un assisted access (AS/NZS3856.1 (1998) Clause 2.1.8:

“(e) When deployed, the gradient of the ramp shall be no steeper than 1 in 4.

Notes: 1. While a gradient of 1 in 4 may be essential under some circumstances of assisted access, this gradient should be avoided. A 1 in 6 gradient is the preferred maximum gradient for assisted access.

2. The gradients for access in AS 1428.1 are recommended. For ramps of up to 1520 mm in length 1 in 8 maximum and for longer ramps 1 in 14. If assistance is provided, the gradient could be slightly steeper, e.g. airports use 1 in 12 on aerobridges, but provide assistance.

6.4 (b) Slope of an external boarding ramp must not exceed: 1 in 8 for unassisted access where the ramp length is less than 1520mm.

6.4 (c) Slope of an external boarding ramp must not exceed: Refer to 6.4 (a). Attachment 4101.3.3

Boarding

The Standards Part 8

8.2 (1) (a) Manual or power assisted boarding device must be available at any accessible entrance to bus that has a vertical rise/gap exceeding 12 mm (AS/NZS3856.1 (1998) Clause 2.1.7 (f):Entry ways shall not have a vertical rise of more than 12 mm (see requirements for interface of a platform with the vehicle in AS/NZS 3856.2).

8.2 (1) (b) Manual or power assisted boarding device must be available at any accessible entrance to bus that has a horizontal gap exceeding 40 mm (AS/NZS3856.1 (1998) Clause 2.1.8 (g):

8.3 (1) If bus has manual or automatic boarding device it must be available for use at all designated stops.

8.3 (2) An available boarding device must be deployed if passenger requests its use.

8.5 (a) Boarding device - min 800 mm wide.

8.5 (b) Boarding device - slip-resistant surface.

8.6 (1) Boarding device must support up to 300 kg.

8.6 (2) Boarding device must be clearly labelled with max load it can carry on the boarding device and next to accessible entrance on outside of bus.

8.7 (1) Signal for requesting deployment of boarding device must be located in allocated space.

8.7 (2) If possible, a signal is to be placed according to dimensions given in AS1428.2 (1992)

Clause 11.4: “Call buttons.”

8.8 (1) Must be possible for passenger to notify bus operator that they need boarding device to board or alight bus.

8.8 (2) If a request signal device is used, it may be located on bus or at boarding point according to dimensions given in AS1428.2 (1992) Clause 11.4: “Call buttons - Call buttons at entrances shall be located not less than 900 mm and not more than 1100 mm above the plane of the finished floor and not less

than 500 mm from an internal corner.

Note: Call buttons should have an integral, continuously operating light.”

Guidelines 8.1 – Boarding devices include hoists gangways ramps scissor lifts aerobridges or any other means of getting a passenger on or off a bus.

Allocated Space

The Standards Part 9

9.1 Min. allocated space for a single wheelchair or similar mobility aid is 800 mm by 1300 mm (AS1428.2 (1992) Clause 6.1: “Clear floor or ground space for a stationary wheelchair – The minimum clear floor or ground space required to accommodate a single stationary wheelchair and occupant shall be 800 mm by 1300 mm.”

“Clear floor or ground space for wheelchairs may be part of the knee space required under objects.”

9.4 (1) At least 2 allocated spaces must be provided in each bus with more than 32 fixed seats.

9.4 (2) At least 1 allocated space must be provided in each bus with less than 33 fixed seats.

9.4 (3) Allocated space is additional to the fixed seating capacity.

9.7 If possible, allocated spaces are to be consolidated to accommodate larger mobility aids.

9.8 An operator does not have to provide allocated space in a coach if each passenger uses a fixed seat in the coach.

9.9 Allocated space may be used for other purposes if not required by passengers using wheelchair or mobility aids.

9.10 (1) (a) Floor area of allocated space must display international symbol of accessibility.

9.10 (1) (b) Floor area of allocated space must be outlined in flush contrasting strip 25 mm wide.

9.10 (2) The colours prescribed in AS1428.1 (2001) Clause 14.2 (c): “The colour of the figure shall be white on a blue background, in accordance with Figure 33”. “The blue shall be B21, Ultramarine of AS 2700, or similar”, are mandatory.

9.11 Allocated space must contain movement of mobility aid towards front or sides of bus.

Doorways

The Standards Part 12

Clear opening of doorways – conveyances

The minimum clear opening for doorways (used by wheelchairs) is 850 mm.

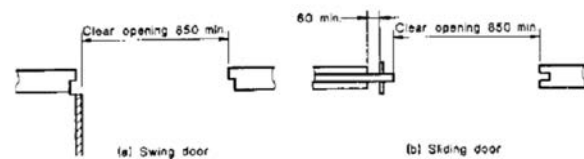


Figure 7 Clear Opening of Doorways, AS 1428.2
Dimensions in millimetres

Stairs

The Standards Part 14

Stairs need to comply with both The Standards and Australian Design Rule 58.

Conveyances – The Standards

Any steps within the bus must comply with: **AS1428.1 (2001)**

Clause 9.1 A strip, not less than 50 mm and not greater than 75 mm, shall be provided on the tread at the nosing with a minimum luminance contrast of 30% to the background.

Conveyances – Australian Design Rule 58

Steps must comply with Australian Design Rule 58 to the extent that the ADR rule sets requirements that conflict with The Standards, (see clause 58.7 of Compliance Check list).

However, stairs on a DDA compliant bus must conform to figure 8 from AS 1428.2.

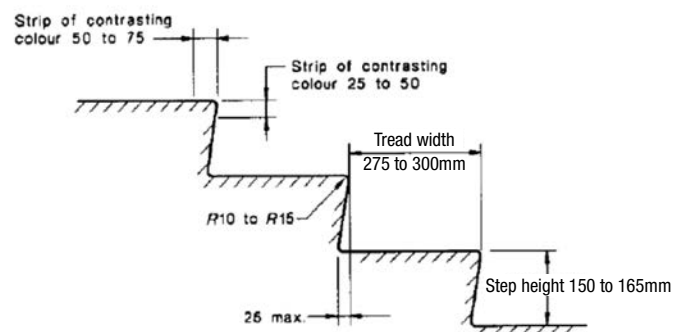


Figure 8 Cross Section of Stairs, AS 1428.2
Dimensions in Millimetres



➤ **Section 4**

Equivalent Access and
Unjustifiable Hardship



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Equivalent Access

The Standards Part 33

Meaning of equivalent access

'Equivalent access' refers to alternative methods of assisting passengers with disabilities to use public transport where there are unavoidable constraints on unassisted access.

Compliance with Standards

- (1) Compliance with The Standards may be achieved by:
 - (a) applying relevant specifications in The Standards before the target dates; or
 - (b) using methods, equipment and facilities that provide alternative means of access to the public transport service concerned (but not using separate or parallel services) with equivalence of amenity, availability, comfort, convenience, dignity, price and safety.

(2) This may include direct assistance over and above that required simply to overcome discrimination.

Consultation about proposals for equivalent access

The operator or provider of a public transport service must consult with passengers with disabilities who use the service, or with organisations representing people with disabilities, about any proposal for equivalent access.

Equivalent access without discrimination

Operators and providers must be able to demonstrate that equivalent access provides public transport without discrimination 'as far as possible'.

Methods of providing equivalent access

- (1) The Standards do not allow for equivalent access to be provided by a segregated or parallel service such as an accessible taxi service substituting for an inaccessible bus service.
- (2) The Standards are intended to remove discrimination from public transport services. They do not impose particular technical solutions where other methods are equally effective and appropriate. For example, there is no impediment to an operator using a high floor bus with a boarding platform rather than a low floor bus with a ramp.

Provision of direct assistance

- (1) An operator or provider will be regarded as giving equivalent access to public transport when assistance is provided to the person in a way that gives an equivalent level of access to the service. The level of assistance provided should be in response to the person's independence and should enable the person to preserve his or her dignity. This assistance can be given during or after the implementation period.
- (2) An operator or provider is permitted to give direct assistance in emergency situations such as evacuation.
- (3) An operator or provider may give equivalent access through direct assistance to a person over and above that provided to other passengers as follows:
 - (a) before and after travel;
 - (b) during boarding and alighting;
 - (c) while travelling.

Assistance before or after travel

If an operator can not provide services in a way that is accessible to all people with disabilities, they can assist passengers with:

- (a) information about the service; or
- (b) the purchasing and validation of a ticket.

Assistance during boarding and alighting

(1) People with disabilities can be assisted to board or alight from conveyances, such as coaches and aircraft, through the provision of:

- (a) mobility aids on conveyances where design constraints prevent use of a person's own mobility aid; or
- (b) assistance in moving from a wheelchair into a fixed seat if an allocated space is not provided.

(2) In giving assistance, the operator may decide that passengers with disabilities should board before, and alight after, other passengers.

Assistance while travelling

Once on board, passengers with disabilities may request assistance with:

- (a) information about the approach of their stop; or
- (b) moving to and from on-board facilities or toilets; or
- (c) information or advice if there is an unscheduled change to services, or the timeframe does not allow for information to be provided in a preferred format.

Unjustifiable Hardship

The Standards Part 33

33.7 Exceptional cases — unjustifiable hardship

- (1) It is not unlawful to fail to comply with a requirement of The Standards if, and to the extent that, compliance would impose unjustifiable hardship on any person or organisation.
- (2) However, compliance is required to the maximum extent not involving unjustifiable hardship.
- (3) In determining whether compliance with a requirement of The Standards would involve unjustifiable hardship, all relevant circumstances of the particular case are to be taken into account including the following:
 - (a) any additional capital, operating or other costs, or loss of revenue, that would be directly incurred by, or reasonably likely to result from, compliance with the relevant requirement of The Standards;
 - (b) any reductions in capital, operating or other costs, or increases in revenue, that would be directly achieved by, or reasonably likely to result from, compliance with a relevant requirement of The Standards;
 - (c) the extent to which the service concerned operates, or is required to operate, on a commercial or cost-recovery basis;
 - (d) the extent to which the service concerned is provided by or on behalf of a public authority for public purposes;
 - (e) the financial position of a person or organisation required to comply with The Standards;
 - (f) any effect that compliance with the relevant requirement of The Standards is reasonably likely to have on the

financial viability of a person or organisation required to comply, or on the provision of the service, or feature of service, concerned;

(g) any exceptional operational, technical or geographic factors, including at a local or regional level, affecting a person or organisation's ability to comply with a relevant requirement of The Standards;

(h) financial, staffing, technical, information and other resources reasonably available to a person or organisation required to comply with The Standards, including any grants, tax concessions, subsidies or other external assistance provided or available;

(i) benefits reasonably likely to accrue from compliance with relevant requirements of The Standards, including benefits to people with disabilities, to other passengers or to other persons concerned, or detriment likely to result from non-compliance;

(j) detriment reasonably likely to be suffered by an operator, provider, passenger or other person or organisation concerned, including in relation to equality of amenity, availability, comfort, convenience, dignity, price and safety of services or effectiveness and efficiency of operation if compliance with relevant provisions of The Standards is required;

(k) if detriment under paragraph (j) involves loss of heritage values — the extent to which relevant heritage value or features of the conveyance, building or other item concerned are essential, and to what extent incidental, to the transport service provided;

(l) whether compliance with a requirement of The Standards may reasonably be achieved (including by means of equivalent access as provided for in sections 33.3 to 33.5) by less onerous means than those objected to by a person or organisation as imposing unjustifiable hardship;

(m) any evidence regarding efforts made in good faith by a person or organisation concerned to comply with the relevant requirements of The Standards;

(n) if a person or organisation concerned has given an action plan to the Commission under section 64 of the *Disability Discrimination Act 1992* — the terms of that action plan and any evidence regarding its implementation;

(o) the nature and results of any processes of consultation, including at local, regional, State, national, international, industry or other level, involving, or on behalf of, an operator concerned, any infrastructure providers as relevant, and people with a disability, regarding means of achieving compliance with a relevant requirement of The Standards and including in relation to the factors listed in this section;

(p) if a person or organisation seeks a longer period to comply with The Standards, or a requirement of The Standards, than is permitted by the preceding sections on Adoption and Compliance — whether the additional time sought is reasonable, including by reference to the factors set out in paragraphs (a) to (o) above, and what undertakings the person or organisation concerned has made or is prepared to make in this respect.

(4) If a substantial issue of unjustifiable hardship is raised having regard to the factors listed in paragraphs (3) (a) to (p), the following additional factors are to be considered:

(a) the extent to which substantially equal access to public transport services (including in relation to equality of independence, amenity, availability, comfort, convenience, dignity, price and safety) is or may be provided otherwise than by compliance with The Standards;

(b) any measures undertaken, or to be undertaken by, on behalf of, or in association with, a person or organisation concerned to ensure such access.

(5) For The Standards:

unjustifiable hardship is to be interpreted and applied having due regard to the scope and objects of the *Disability Discrimination Act 1992* (in particular the object of removing discrimination as far as possible) and the rights and interests of all relevant parties.

Exceptional Cases

The Guidelines Division 33.4

33.12 Non-compliance due to unjustifiable hardship

(1) The *Disability Discrimination Act 1992* recognises that an operator or provider need not comply with the provisions of the Act if it is proved that the operator or provider will be exposed to unjustifiable hardship. This defence is restated in The Standards to ensure that it remains available in exceptional circumstances.

(2) The definition of **unjustifiable hardship** is based on the definition in the *Disability Discrimination Act 1992*. This is consistent with the performance-based approach of The Standards. If this definition expands on the definition in the *Disability Discrimination Act 1992*, it should be considered as being in addition to and, to the extent possible, consistent with the definition in that Act.

33.13 Maximum compliance required

(1) Notwithstanding an unjustifiable hardship defence, if an operator or provider cannot comply with all requirements of The Standards, The Standards require compliance to the maximum extent possible.

(2) In such a case, and if a complaint is lodged with the Australian Human Rights Commission, the operator or provider will be required to establish the grounds upon which full compliance with The Standards imposes unjustifiable hardship on the operator or provider in relation to the operation of the service.

33.14 Matters to be taken into consideration

(1) The Standards include a checklist of factors that may be taken into consideration in arguing unjustifiable hardship. The checklist is not exclusive.

(2) It is intended that the checklist will assist the Australian Human Rights Commission, the Federal Court and the Federal Magistrates Service by outlining the major matters relevant to public transport.

(3) An operator or provider that is seeking to prove unjustifiable hardship must also prove that the opportunities for providing equivalent access have been exhausted.

(4) For example, after consulting with relevant authorities and passengers about equivalent access, a ferry operator may conclude that difficult topographical conditions at a wharf present unique problems and may choose to argue unjustifiable hardship.

33.15 Exemptions

(1) Amendments to the *Disability Discrimination Act 1992* have been made to allow for applications to be made to the Australian Human Rights Commission for the granting of an up-front exemption, for example, on the basis that it may not be possible to fully comply with The Standards for financial, technical or other reasons. An operator or provider would have to comply with any terms and conditions specified, for the period specified, in the exemption instrument.

(2) An exemption will protect an operator or provider from a complaint that might otherwise arise about a breach of the relevant disability standards. Exemptions can be granted for a maximum of 5 years and a further exemption application can be made.

(3) Before granting an exemption from The Standards, the Australian Human Rights Commission must take into account the advice of a body prescribed in the Regulations. The body prescribed for that purpose is the National Transport Secretariat. The Australian Human Rights Commission may also consult any other body or person about the exemption.



➤ **Section 5**

Commonly Asked
Questions and Special
Considerations

What is a mobility aid?

The Standard often refers to “wheel chairs or similar mobility aid”, classified as boarding devices, but does not provide a definition of a mobility aid. A reasonable interpretation of a mobility aid may include: wheelchair (manual or powered), mobility scooter, ‘wheelie-walkers’ and other walking frames, braces, canes and crutches.

The Disability Standards Guideline has provided criteria for boarding devices which reflect assumptions under the Disability Standards.²¹ It should be noted that passengers themselves may be unaware of this criteria.

CONFORMANCE REQUIREMENTS OF MOBILITY AIDS	
Weight	The combined weight of the passenger and the mobility aid needs to be less than 300 kg
Width	The overall width of the mobility aid needs to be less than 800 mm.
Manoeuvrability	The mobility aid would need to be capable of turning through 180 degrees within an area of 2070 mm by 1540 mm
Allocated space	The space for stationary mobility aids is 800 mm wide by 1300 mm long
Wheels	A mobility aid should be able to: (a) cross a horizontal gap up to 40 mm wide; and (b) mount a vertical rise (bump) up to 12 mm; and (c) cross grating gaps up to 13 mm wide and 150 mm long
Brakes	Mobility aids need to have effective braking systems to maintain stability and be able to withstand acceleration, braking, cornering and pitching of conveyances
Anchoring devices	If anchoring devices are required by regulation, mobility aids need to be able to accept and travel with anchoring devices fitted
Ramps	Mobility aids should be able to negotiate: (a) a 1 in 14 ramp unassisted; and (b) a 1 in 8 grade where the ramp is less than 1520 mm
Batteries	Electric mobility aids may need to comply with regulations governing the carriage of batteries on public transport. Batteries need to be adequately secured while gel or solid state options should be considered

²¹ Guidelines Part 40.1



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Contact your State Association who can help with referring you to APTIA



What else should be considered?

Assuming a boarding device meets the conformance requirements of a mobility aid, there are other factors that Operators may consider:

- > obstruction of space due to any additional fit-outs not factored into original design (ie. driver payment areas or ticket validation machines);
- > the use of flip seats over allocated space;
- > how to ensure the allocated space is cleared (including of other users) at the time when it is required for a person using a mobility aid;
- > provision of mechanisms that may allow mobility aids to be secured or stabilised for the journey (such as anchor points or straps).

What do I tell my drivers about providing assistance?²²

It is expected that Passengers in wheelchairs or mobility aids must be able to enter and exit a bus (but not coach) and position their aids in the allocated space.

If the design restrictions of a coach limit on-board manoeuvring areas for wheelchairs and similar mobility aids, the operator of the coach must ensure equivalent access by direct assistance to passengers.

Do I have to allow carers to travel free?²³

Operators may choose to offer free travel to carers but it is not a requirement apart from persons who are accompanying the holder of an Ex-Member of the Defence Forces pass.

The Standards state that “All passengers must be prepared to pay fares.”

What if there are insufficient accessible toilets at the spots I take tours?

In these situations it is essential that arrangements to deal with this problem be determined in advance. The passenger may in this instance elect not to travel or suitable arrangements be determined by means of providing equivalent access by direct assistance.

What if I use my vehicle for school services and route services?²⁴

A bus is a **dedicated school bus** only during the time in which it is being used to provide a dedicated school bus service. Therefore, if the bus is used for route service, the number of trips the bus does on route service will be taken into account in calculating compliance with the targets.

All buses used on route services must be accessible by 31 December 2022 regardless of whether they are used for other purposes.

Does my driver have to leave his/her seat to assist a passenger constrained in a wheelchair or similar device?

There is no easy answer to this as the driver needs to remain in control of the vehicle at all times and may also be required to manage passenger boarding such as manual deployment of a wheelchair ramp. Some Commonwealth and State regulatory agencies may include regulations that discourage or prevent the driver leaving the seat without good cause. The driver's own health and safety as well as that of other passengers must be considered at all times.

Each service provider should consider its own operating environment and driver training needs to establish guidelines suitable to their own operations.

Can any disability aid enter an accessible bus and coach?

Many disability aids may not be suitable or practical for manoeuvring onto a bus or coach. Some States have guidelines which help drivers decide if a disability aid is suitable for use on a bus or coach. At the time of this publication, the industry is endeavouring to have disability aids labelled to help the passenger and driver know if a device is suitable for use on a bus or coach.

Until this is addressed the driver needs to use best endeavours based on company policy to accept or reject a passenger using a disability aid.

How do I calculate the percentage of conformance compliance targets for route services?

This is not specified in The Standards, however The Australian Human Rights Commission (AHRC) has advised that the number of trips (route services) is the appropriate measure for bus operators. An appropriate calculation would be to determine how many trips operate in a 7 day week (in school holiday time) to arrive at the number of “public transport services” and apply the target percentage ie. 55% to that number. The result becomes your compliance target rounded up if the result is not a whole number. Operators should refer to their timetables to decide how many public transport services they provide. For example, an outward journey and an inward journey would be 2 trips – unless it is a circuitous route, which would be one trip.

²² Standards Part 3.2

²³ Standards Part 25 and Commercial Contract

²⁴ Standards Part 1.13

Are my charter services considered a “public transport service?”

The Standards do not directly deal with this question however operators providing coach tour services which are being offered generally to the public on a per seat basis, must comply with the The Standards; service to be performed by accessible vehicles within the timeframe specified. Compliance would also include Express Coach Services following a timetable available to the public with prescribed fares.

Charters which involve contracting with a group (not the general public) to provide a transport service are not covered by The Standards but are covered by the DDA legislation. If however, that group sells tickets to the public, an accessible vehicle would be required to perform the charter.

If my route service operates on bad roads (and or with poor bus stop infrastructure) not suitable for low floor buses, what do I need to do?

Investigate a high floor accessible vehicle, however if this does not overcome the infrastructure problems or cause unjustifiable financial hardship develop an action plan and submit it to Australian Human Rights Commission for approval.

Can I arrange for a taxi or minibus service to carry a wheelchair passenger wanting to use my regular passenger service?

A separate or parallel service is not a solution that complies with The Standards however such alternatives appears to be gathering acceptance by some passengers requiring wheelchair friendly services.

Do wheelchairs have to be secured in the allocated spaces?

At the time of this publication, there are various devices being trialled to secure wheelchairs or similar devices. A common industry practice is that the wheelchair's own brake should be applied with the wheelchair passenger facing the rear of the bus. Operators are encouraged to consider the comfort of your passengers as some wheelchair passengers may not like this position preferring to face the middle or front, like other passengers.

Once again the drivers need to assess the individual circumstances and take a common sense approach. Operators should develop their own procedures for drivers.

Does a driver need to assist a passenger transfer out of a chair/device in a coach?

Once on board the coach the passenger in a wheelchair may request assistance. Some passengers will travel with people or carers that will assist them and others may not.

A driver should take reasonable steps to assist the passenger, ensuring they are not lifting or manoeuvring themselves into situations that may cause them to harm and injure or risk an accident. Refer section 4 on “Equivalent Access and Unjustifiable Hardship”.





➤ **Section 6**

Guidelines to Serving Customers with Disabilities

More than four million people in Australia (18.5%) reported having a disability in 2009, according to the results of the Survey of Disability, Ageing and Carers (SDAC).²⁵

For the purposes of SDAC, a disability is defined as any limitation, restriction or impairment which restricts everyday activities and has lasted or is likely to last for at least six months.

Examples range from loss of sight that is not corrected by glasses, to arthritis which causes difficulty dressing, to advanced dementia that requires constant help and supervision.

Bus and coach travel plays a very prominent role in meeting the mobility needs of Australians with disabilities.

As an Industry, we have a responsibility to be aware and accommodating of the specific needs of members of the community who have disabilities.

These guidelines may assist with:

- > General Principles on how to provide better services to customers with disabilities
- > Communicating with customers who have disabilities
- > Serving customers who use wheelchairs and mobility aids
- > Serving customers who use service animals
- > Serving customers with visual impairments
- > Marketing to customers with disabilities

General Principles on How to Provide Better Services to Customers with Disabilities

The Benefits to you and your Customers

Treating all customers with respect is the key to excellence in customer service.

By providing high standards of service to customers with disabilities you will offer better services to all of your existing and potential customers.

If you treat customers with disabilities with courtesy, respect and a high level customer service ethic your operation will gain:

- > Loyal customers;
- > Repeat business;
- > Increased revenue through referrals and additional business;
- > Recognition and reward from the community.

General Principles

The following general principles if followed in your business will lay the foundation of high level customer service for customers with disabilities:

- > Treat customers with disabilities with respect and dignity.
- > Emphasise the person not the disability.
- > Give customers with disabilities the same information and choices that you give other customers.
- > Treat all customers in a friendly, helpful manner.
- > Solve problems in a professional manner.
- > Treat people with disabilities with respect and consideration.
- > Don't make assumptions about the type of disability or disabilities a person has.
- > Ask before you offer help; ask customers with disabilities if they need assistance, don't assume they do.
- > Do not touch a customer without their permission.
- > Speak directly to customers with disabilities, not their companions.
- > If you are not sure what to do, don't make assumptions, ask the customer how you can help.
- > Some disabilities are not visible.
- > Every business should have emergency procedures for customers with disabilities. Make sure you know what yours are.

Communicating with Customers who Have Hearing, Speaking or Visual Disabilities

While these guidelines are mostly intended for people with communications related impairments (hearing, speaking and visual), the use of them in all customer situations will improve the standards of your customer service.

- > Speak clearly. It is not necessary to raise your voice when speaking to a customer with a hearing impairment, it is important to speak clearly.
- > Speak with a normal tone and speed unless the customer requests otherwise.
- > Use plain language and speak in short sentences.
- > Where spoken communication by the passenger is difficult, ask questions that can be answered 'yes' or 'no'.
- > If you are giving directions or verbal information to a customer with visual impairment be precise and clear. Pointing at seats or objects is unhelpful and people may need assistance to find seats.
- > Make sure you have been understood.
- > Don't interrupt or finish your customers' sentences. Wait for them to finish.
- > People who are deaf use sign language. Patience is needed with some people whose speech is slow or slurred.
- > If you can't understand what someone is saying, don't pretend you can, politely ask them again.
- > Face customers when you are speaking to them and don't let objects obstruct their view. This will be of assistance to people who are deaf and rely on lip reading.
- > It is often a good idea to have a pad of paper and a pen available so that you can write and receive written messages to assist some people who are deaf but are literate in English.

²⁵ Australian Bureau of Statistics

Serving Customers who use Wheelchairs and Mobility Aids

- > It is expected that passengers in wheelchairs must be able to enter and exit a bus (not a coach) and position their wheelchair in the allocated space. If this is not practicable, operators must provide equivalent access by direct assistance.
- > If the design restrictions of a coach limit on-board manoeuvring areas for wheelchairs and similar mobility aids, the operator of the coach must ensure equivalent access by providing direct assistance to passengers.
- > Always seek permission from the customer prior to providing direct assistance and check with the customer on how best to do this.
- > Wheelchairs, walkers, canes and other mobility aids are a part of the customers' personal space. Do not hold or lean on them without the customers' permission.

Serving Customers who use Service Animals

- > Service animals are highly trained and allowed by law to ride with customers on buses.
- > Guide dogs are the most commonly used type of service animals, but other animals may help people with disabilities.
- > Some, but not all service animals wear identification like a tag, vest, or special harness. If you are not sure that the animal is a service animal, ask. Certification or identification is not required for the animal.
- > The owner must stay with the service animal and keep it under control at all times.
- > Never touch or talk to the service animal.

Serving Customers with Visual Disabilities

- > Identify yourself.
- > Don't just assume the customer can't see you.
- > Don't walk away from a customer without saying goodbye.
- > Respond verbally when the customer gives you information, so that he/she will know that you have heard them.
- > Ask the customer what type of assistance is needed and how you can best provide it.
- > When giving the customer their change, count out aloud, and identify the denomination of the notes.
- > Announce the arrival at their destination.

Marketing to Customers with Disabilities

In developing a marketing strategy for customers with disabilities it is important to remember people with disabilities are the only ones who really know what they need or want.

The following ideas should be considered in a marketing strategy for customers with disabilities:

- > Test your marketing approach with people with disabilities. Select people with a variety of disabilities to be part of your strategy.
- > Keep an open mind about what persons with disabilities can or cannot do, want or need, to drive your marketing strategy. Advances in technology, rehabilitation, and medicine, coupled with changes in societal attitudes, make many activities previously thought impossible for persons with disabilities possible.
- > Recognise the diversity of the disability market. Do not assume that one size fits all. Define why this market sector, and its development team. Define the individual components and needs of persons with disabilities.
- > Include people with disabilities in your product development. Remember that products geared to meet the needs of persons with disabilities often can be marketed to the public at large.
- > Develop simple modifications to make existing services and products user-friendly to persons with disabilities.
- > Test market your products and services with the disability community to measure accessibility and/or usability by persons with different types of disabilities. This includes resources such as websites.
- > Develop promotional strategies that target persons with disabilities and their family members as desired customers.
- > Integrate persons with disabilities in your print and television advertising. Use persons with disabilities as models, actors in your commercials, or as spokespersons.
- > Include disability community newspapers, magazines, and newsletters in your print advertising budget.
- > Attend and exhibit at annual consumer disability conferences, as well as disability-related conferences for third party payers and professional organisations.
- > Become involved with the disability community by sponsoring and/or participating in a national or local event or project



➤ **Section 7**

Five Year Review of The Standards

Review Recommendations as Conducted in 2011

This Guide was first written in June 2003. The Standards are subject to review on at least a five yearly basis and it is possible that they may be updated more frequently.

In 2011 the final report of a five year review of the Standards was delivered by Allen Consulting. In total there were 15 recommendations issued by the Review. The recommendations and the Australian Government responses which are relevant to operators are included below.

These recommendations are subject to implementation in the future, but it is good business practice to start planning for these recommendations now.

Of particular importance to bus operations is recommendation 14 which calls for the phased application of dedicated school bus services to physical access requirements in The Standards, commencing in 2029 and being fully required by 2044. This recommendation has been agreed to in principle by the Federal Government but the State jurisdictions do not support this recommendation. Your State Association and the Bus Industry Confederation will keep you informed in regard the progress of the following recommendations.

Recommendation 1 Action Plan Reporting

Establish a national framework for Action Plan reporting and require annual reporting by each State and Territory government.

The Government supports this recommendation in principle, noting that it calls for the development of a common reporting framework and reporting timeline.

The Government agrees that establishing a national framework for the consistent reporting of public transport Action Plans would benefit all stakeholders, in particular through improved understanding of current service provision and enhanced capacity for future reviews to have more consistent data on progress.

The Government proposes that such a national reporting framework, consistent with the objectives of the National Disability Strategy and Council of Australian Government's (COAG's) regulatory impact assessment processes, be progressed through the Australian Transport Council (ATC).

Recommendation 2 Australian Bureau of Statistics Surveys

Request the Australian Bureau of Statistics (ABS) include questions on public transport patronage in their Disability surveys.

The Government agrees in principle with this recommendation and will ask the ABS about obtaining patronage data, consistent with its budget and technical constraints.

The Government notes that some aspects of this Review were impeded by a lack of baseline data. Obtaining additional information on public transport patronage, through ABS surveys, potentially helps governments understand public transport needs and would better inform future reviews.

In addition, the National Disability Strategy will facilitate enhanced data collection and provision of relevant national population indicators for accessibility in the community.

Recommendation 3 Technical Experts Group

A technical experts group be convened, with Standards Australia, to develop technical standards specifically suited to public transport conveyances and infrastructure. Once developed, The Standards should be referenced in the Transport Standards, and made available for public use.

The Government agrees in principle with this recommendation and considers there is merit in examining the development of technical standards specifically suited to public transport conveyances and infrastructure which complement The Standards. The Government acknowledges the issues around referencing certain Australian Standards which are not always appropriate in a transport context, and which have subsequently been updated or replaced since the introduction of The Standards.

The establishment of specific transport-focussed technical standards potentially benefits all stakeholders. Public transport operators and providers could have greater clarity as to their obligations in providing a service which is compliant with The Standards. Inclusion of the technical standards with The Standards could also enable people with disability to more readily determine whether discrimination has occurred.

The Review notes that further Regulatory Impact Statement (RIS) analysis may be required as part of the process of finalising any new technical standards.

Further, it is important to note that Standards Australia is an independent body and has established business rules regarding the preparation of new and revised standards. The Department of Infrastructure and Transport (DIT) will need to discuss with Standards Australia its capacity and willingness to participate in such an exercise, or whether it should be developed via a separate process.

The proposal to progress such technical standards work through convening a new working group is a matter for ATC to consider. The response to Recommendation 9 discusses this theme further.

Recommendation 4 Modal Sub-Committees to Develop Specific Guidelines

Mode specific guidelines be developed by modal sub-committees. These guidelines would be a recognised authoritative source for providers which can be used during a complaints process.

The Standards Guidelines provide a measure of guidance in relation to the interpretation of The Standards generally and address some mode specific issues in a limited way.

The Government supports in principle the development of mode specific guidelines, which could be useful for public transport operators and providers. In this context, guidance material may be developed for taxis, buses, coaches, trains, trams, ferries and commercial aircraft. The merits of establishing additional sub-committees to develop mode specific guidance material, is a matter for the ATC to consider. The Response to Recommendation 9 discusses this theme further.

The Government acknowledges that modal specific groups have previously been established under the Accessible Public Transport National Advisory Committee (APTNAAC) to develop guidelines. An Aviation Access Working Group is already in place, chaired by the DIT.

The Government proposes that the ATC considers the most appropriate mechanism to progress this recommendation.

Recommendation 5 Mobility Labelling Scheme

A mobility labelling scheme be developed which identifies the weight of the aid and whether its dimensions fit within the dimensions for allocated spaces, boarding devices, access paths and manoeuvring areas on conveyances, as specified in The Standards.

The Government supports this recommendation in principle, noting that such a scheme would operate within the dimensions for allocated spaces currently specified in The Standards.

The Government agrees that a mobility labelling scheme could be beneficial to public transport operators and providers and mobility aid users. The Government recognises that operators and providers can face difficulties in determining whether a particular mobility aid is compliant with the dimensional limitations set out in The Standards. The introduction of such a scheme would also give mobility aid users some assurance as to what transport conveyances they can access.

As there may be some costs for mobility aid retailers and suppliers to implement such a scheme, and administration costs for governments in developing, implementing and maintaining a scheme, further consultation and analysis will be required.

The Government proposes this recommendation be referred to the ATC for consideration, noting that, the development of such a framework should include input from the relevant state and territory agencies responsible for the provision of aids and equipment.

Recommendation 6 Establish a Best Practice Clearinghouse

A best practice clearinghouse be established in a government agency or research body to collect and disseminate best practice solutions and ideas relating to accessible public transport.

The Government supports the principle of improving the gathering and dissemination of best practice solutions and ideas relating to accessible transport. This could be valuable for other public transport operators and providers in similar circumstances, and yield broader benefits in terms of improved information.

It is not clear, however, where this function might best be undertaken, or even whether such location is best established in a government agency or research body. Moreover, there would be merit in considering the objectives of this recommendation in the development and implementation of the broader work program.

The Government proposes this recommendation be referred to the ATC for further consideration.

Recommendation 7 Provision of Funds for Projects in Regional and Rural Regions

Commonwealth, State and Territory governments provide funding for projects in regional and rural regions where local governments are unable to resource upgrades of public transport infrastructure.

The Government notes this recommendation and the Review's conclusion that regional and rural areas, in most cases, are falling behind in the provision of accessible public transport services compared to those in urban areas.

However, the provision of funding for projects is a matter for each government to consider, including in the context of existing regional infrastructure programs and budget deliberations. For its part, the Australian Government will give consideration to the eligibility criteria for existing regional and rural transport and infrastructure programs, to ensure no inappropriate exclusions apply to projects that would support compliance with The Standards.

Recommendation 8 AHRC to Provide Greater Support for Representative Complaints

The AHRC be tasked to provide greater support for representative complaints on behalf of people with disability, reducing the legal cost burden on individuals.

The Government notes the recommendation.

As part of Australia's Human Rights Framework, the Government is reviewing and consolidating Commonwealth anti-discrimination legislation, including considering gaps in protection and an effective complaints system.

Recommendation 9 New Governance on Progressing Recommendations From the 5 Year Review

New governance arrangements be implemented to establish accountability for progressing recommendations from the five-year Review. Accessible Public Transport Jurisdictional Committee (APTJC) should have coordinating responsibility for new initiatives (including modal committees and the technical experts group) in partnership with APTNAC.

The Government supports this recommendation in principle.

As discussed above, the ATC has the key policy and regulatory advisory responsibility relating to the development of possible amendments to The Standards, and for overseeing the governance of transport agency working groups to deliver the various work programs.

ATC Ministers agreed to implement the future National Transport Policy work through a streamlined structure of Standing Sub-committees of the Standing Committee on Transport. The Standing Sub-committees will focus on Productivity, Safety, Environment, Security, Maritime and Network Performance agendas framed around ensuring transport infrastructure and operations can play their essential role in underpinning a return to economic growth. It has been further agreed that APTJC and APTNAC work will be considered through the Network Performance Standing Sub-committee.

In May 2009, the ATC finalised a streamlined structure of sub-committees of the Standing Committee of Transport (SCOT). A key theme of this work was to rationalise the demands that complex working group structures impose on all stakeholders and to ensure that available resources are targeted to the most appropriate areas.

The transport governance framework that the ATC has put in place is broadly consistent with that identified in this recommendation, that is, a framework in which APTJC leads and coordinates, in consultation with APTNAC, progressing the response to the Review's recommendations. This will continue to be a matter for ATC to decide.

Recommendation 12 Government to Commissions more Research

Government commission research into the safety of passengers travelling in conveyances whilst seated in mobility aids (including scooters). This research should make recommendations around whether there is a need for an Australian Standard addressing this aspect of safety for mobility aids.

The Government notes this recommendation and acknowledges the importance of improving safety for travelling passengers, and the potential risks associated with passengers in mobility devices travelling on conveyances without restraints. The Government also recognises the value of appropriately targeted research and trials in achieving this safety objective.

The Government further notes that this recommendation has potential resourcing implications and the Review gives no consideration to what such research might cost or how it might compare with other transport safety research priorities.

The Government proposes that the ATC considers the most appropriate mechanism to progress the further assessment identified in this recommendation.

Recommendation 13 The Standards be Amended to Include New Community Transport Vehicles

The Standards be amended to require new community transport vehicles greater than 12 seat capacity to comply with The Standards commencing in 2017, (with full compliance by 2032).

The Government supports this recommendation in principle.

The Review found that the current exclusions relating to community transport vehicles limit the current and future provision of services for people with disability. The Government supports the objective of removing the exclusions over time.

The Government proposes that the ATC considers the most appropriate mechanism to progress this recommendation, noting that the potential impact on community transport operators and providers indicates that further consultation and analysis is likely to be required.

As part of this further analysis, there would be merit in examining the experience of the Home and Community Care Program within jurisdictions, and to also consider the potential benefits and costs of accelerating the phase-in of reform under this recommendation.

Recommendation 14 Phased Application of Dedicated School Bus Services

Phased application of dedicated school bus services to physical access requirements in The Standards, commencing in 2029 and being fully required by 2044.

The Government supports this recommendation in principle.

The Review found that the current exclusions to the physical access provisions of dedicated school buses limit the current and future provision of services for students with a disability.

The Government recognises the importance of providing students with a disability every opportunity to participate in community life, including being able to travel alongside students without disability on dedicated school bus services. The Government also considers there is merit in examining the potential consequences of this recommendation on existing complaints-based mechanisms of compliance.

The Government proposes that the ATC considers the most appropriate mechanism to progress this recommendation noting that the Review concludes that a full RIS would be required in light of the potential cost impact on school bus operators and providers. As part of the further analysis, there would be merit in examining the number of second-hand accessible buses that may currently be available for purchase by dedicated school bus operators (accessible buses have been in service since 1995) and, if possible, the scope to commence earlier or shorten the phase-in requirements.



➤ **Section 8**

References

Australian Standard AS 1428.1-2001 Design for access and mobility

Part 1: General requirements for access – New building work
<http://www.equalaccess.com.au/>

Australian Standard AS 1428.2-1992 Design for access and mobility

Part2: Enhanced and additional requirements – Buildings and facilities
<http://www.equalaccess.com.au/>

Best Practice Guidelines for NSW Public Transport Signage and Information Displays are available at the National Library of Australia's catalogue:

<http://catalogue.nla.gov.au/>

The full Disability Discrimination Act 1992 is available at the Austlii website:

http://www.austlii.edu.au/au/legis/cth/consol_act/dda1992264/

Disability Standards for Accessible Public Transport 2002 are available at the Australian Government's ComLaw website:

www.comlaw.gov.au/

Final Draft Technical Review Report on Disability Standards for Accessible Public Transport are available at the Attorney General's Department website:

<http://www.ag.gov.au>

Guideline for promoting compliance of bus stops with the Disability Standards for Accessible Public Transport 2002

<http://www.humanrights.gov.au>

Guidelines on application of the Premises Standards are available the Australian Human Rights Commission website:

<http://www.humanrights.gov.au>

The Australian Human Rights Commission's Guide to preparation of Action Plans is available their website:

<http://www.humanrights.gov.au>

Public Information Symbol Signs AS 2899.1 available at the Department of Local Government and Planning's (QLD) website:

<http://dlgp.qld.gov.au/>

Practical Guide to Bus Service Information, ISBN 0 7313 9804 1, NSW Ageing and Disability Department, March 2001 available at the National Library of Australia Catalogue:

<http://catalogue.nla.gov.au/>

Accessible Transport Action Plan for New South Wales Transport Agencies available at the Transport NSW website:

<http://www.transport.nsw.gov.au>



BIC The Bus Industry Confederation (BIC) is the national representative body dedicated to promoting bus operators, manufacturers and suppliers to ensure the long term viability of the Australian Bus and Coach Industry.

The BIC understands that our core business as an industry is *Moving People*. With ongoing research, policy development and advocacy, the BIC ensures that governments understand that there is a continuing need for passenger transport.

APTIA The BIC also incorporates an industrial relations arm, the Australian Public Transport Industrial Association (APTIA). The primary role of APTIA is to provide advice on industrial relations to the BIC and its State Association members. APTIA also provides monthly bulletins, express IR News and representation at Fair Work Australia to APTIA members.

OzeBus is the online home of the bus and coach industry in Australia. OzeBus provides premium membership access; publications, guidelines, statistics and fact sheets relating to national issues and industry compliance; industry research and policy documents; and information about our *Moving People* agenda and strategic Partners.

Our Members The continual support from Members of the BIC and APTIA has been a critical factor in our capacity to promote the national interests of businesses in the Australian Bus and Coach Industry, ensuring our industry is top of mind with politicians, bureaucrats and the community.

In addition to providing funds, our members serve on various BIC committees overseeing the national agenda, including: technical, environment and safety; industrial working group; taxes, charges and infrastructure; research; long distance, charter and express; regulation, reform and industry standards; national contracts group; marketing and events.

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➤ **Section 9**

Appendixes

APPENDIX 1 - ACTION PLANNING EXAMPLES

Note: The strategies included are examples and are not meant to be a complete list of strategies to enable bus operators to comply with the requirements of the DDA.

The following exemplified format is not restrictive. For instance, a transport service provider may wish to add an 'Achievements' column to the tables to show how the organisation is progressing against the timeframe/target.

Information about services

BARRIER	STRATEGIES	RESOURCES	RESPONSIBILITY	TIMEFRAME
People with a disability do not always have alternative access to information.	Provide information on a website in accordance with W3C Web Accessibility Guidelines.	\$(insert amount] and staff (can include \$ value of staff time in overall cost. May also advise 'within existing budget' if it is impossible to separate financial resources required from an overall program).	Manager, Corporate Services.	Fully compliant website by [insert date]
	Develop a customer charter to improve the quality of information on customer service for people with disabilities.	See above	Customer Service Manager	Customer Charter published by [insert date]
	Implement revised format for bus timetables with an accessible format and font.	See above	Information Manager.	[insert percentage] of timetables in revised format by December 2003. [insert percentage] of timetables in revised format by July 2004.

Physical Access to services and infrastructure

BARRIER	STRATEGIES	RESOURCES	RESPONSIBILITY	TIMEFRAME
Bus services are not fully accessible.	Increase the proportion of accessible buses in the fleet.	[insert dollars] million over [insert number] of years.	Manager, Purchasing.	[insert percentage] of the fleet to be accessible by 200?
	Review services to develop a route priority policy for accessible buses.	Within route development budget.	Manager, Operations.	Accessible buses to feature on timetabled routes by [insert month]/200[insert year]
The corporate facilities of the transport provider may not be fully accessible to people with disabilities.	Undertake an access audit of the transport provider's premises as part of an overall Asset Management Plan and make changes where required.	Within budget for Asset Management Plan.	Manager, Corporate Services.	Corporate facilities to be accessible to people with disabilities by -[insert month]/200[insert year]

Complaints procedures

BARRIER	STRATEGIES	RESOURCES	RESPONSIBILITY	TIMEFRAME
Complaint mechanisms are not fully accessible.	Develop a new customer feedback system including facilities for hearing-impaired persons (eg TTY Telephone Typewriter facility).	[insert dollar amount] from Information Management Budget.	Information Manager.	Complaint mechanisms fully accessible to people with disabilities by -[insert month]/200[insert year]

Staff training and employment practices

BARRIER	STRATEGIES	RESOURCES	RESPONSIBILITY	TIMEFRAME
Employees require disability awareness training.	Engage a consultant to provide disability awareness training to all staff.	Within staff training budget.	Manager, Corporate Services.	All staff to have received disability awareness training by -[insert month]/200[insert year]
Employees may not be aware of the specific safety needs of people with disabilities.	Include safety concerns of people with disabilities in safety training for staff.	Within staff training budget.	Manager, Corporate Services.	All staff to have received safety training including a disability safety module by -[insert month]/200[insert year]
Corporate planning may not include consideration of employees with disabilities.	<p>Develop strategies to assist employees with disabilities including:</p> <p>Workplace adjustment strategies to cope with specific disabilities, including alternate technologies;</p> <p>Flexible working arrangements; and</p> <p>Regular surveys of staff disability profiles.</p>	Within staff training budget.	Manager, Corporate Services.	<p>Survey of staff disability profile to be completed by -[insert month]/200[insert year]</p> <p>Alternate technologies provided for employees with disabilities by -[insert month]/200[insert year]</p>

Promoting positive community attitudes

BARRIER	STRATEGIES	RESOURCES	RESPONSIBILITY	TIMEFRAME
Passengers without disabilities may not be aware of the access needs of passengers with disabilities.	Promote transport initiatives that demonstrate that improved access is beneficial for the whole community	Within advertising budget.	Manager, Information Services.	All future initiatives for people with disabilities should be marketed to include the wider community.

Action Planning Checklist

PRIORITY AREAS FOR ACTION (Tick when action is complete)					
ACTION	INFORMATION ON SERVICES	PHYSICAL ACCESS TO SERVICES	COMPLAINTS PROCEDURES	STAFF TRAINING AND EMPLOYMENT PRACTICES	PROMOTING POSITIVE COMMUNITY ATTITUDES.
Identify barriers to access					
Identify Strategies to remove barriers to access.					
Identify Resources required to implement strategies.					
Identify responsible area/officers for each strategy.					
Identify timeframe for completion of strategy.					



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 National Australia Bank
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 Newcastle Commercial Vehicles
 OAMPS Insurance Brokers
 O'Brien Glass Industries

Parts Supply Solutions/Hanover
 Displays
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 Powerdown Australia
 Reatex Marketing (Aust)
 Sika Australia
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