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Contents

1.   Disabled People's Organisations Australia (DPO Australia)

Disabled People's Organisations Australia (DPO Australia) is an alliance of four national DPOs in Australia. DPOs are organisations that are governed, led by and constituted of people with disability.

The key purpose of the DPO Australia is to promote, protect and advance the human rights and freedoms of people with disability in Australia by working collaboratively on areas of shared interests, purposes and strategic priorities and opportunities.

DPO Australia is made up of four national population specific and cross-disability DPOs that have been funded by the Australian Government to represent the views of people with disability and provide advice to Government/s and other stakeholders.

The four DPO Australia members are:

Women With Disabilities Australia (WWDA) is the national cross-disability DPO for women and girls with all types of disabilities in Australia. It operates as a transnational human rights organisation and is run by women with disabilities, for women with disabilities. WWDA's work is grounded in a human rights based framework which links gender and disability issues to a full range of civil, political, economic, social and cultural rights.

First Peoples Disability Network Australia (FPDNA) is the national cross-disability DPO representing Aboriginal and Torres Strait Islander people with disability and their families. FPDNA utilises a range of strategies in its representative role, including through the provision of high-level advice to governments, and educating the government and non-government sectors about how to meet the unmet needs of Aboriginal and Torres Strait Islander people with disability.

People with Disability Australia (PWDA) is the national cross disability rights and advocacy organisation run by and for people with disability. Working within a human rights framework, PWDA represents the interests of people with all kinds of disability. Its primary membership is made up of people with disability and organisations primarily constituted by people with disability. It also has a large associate membership of other individuals and organisations committed to the disability rights movement.

National Ethnic Disability Alliance (NEDA) is the national DPO representing the rights and interests of Culturally and Linguistically Diverse (CALD/NESB) people with disability, their families and carers throughout Australia. NEDA advocates at the federal level so that CALD/NESB people with disability can participate fully in all aspects of social, economic, political and cultural life.

2.   Introduction

2.1   DPO Australia welcomes the opportunity to provide this submission to the Department of Infrastructure, Regional Development and Cities, *Third Review of the Disability Standards for Accessible Public Transport 2002* (Issues Paper); we note the second review is still in process and acknowledge the detailed work the Department is undertaking in regards to modernising the standards, and therefore provide our submission for consideration into the wider transport reform agenda.

2.2   DPO Australia fully endorses the submission and associated technical recommendations provided to the Department of Infrastructure, Regional Development and Cities by Dr John McPherson.

2.3   DPO Australia's submission is based on the lived experiences of people with disability, and our many years of representing the rights of people with disability to access and use public transport on an equal basis with others. In response to this issues paper, DPO Australia conducted a survey across our membership to capture the public transport experiences of people with disability and incorporated their feedback into our submission. We also draw upon our submissions, collective input into national policy and legislation, and joint representative advocacy DPO Australia undertakes within national transport forums e.g. our membership on the National Accessible Public Transport Advisory Committee. We assert that the international human rights framework must underpin the human rights protections of people with disability

2.4   DPO Australia is significantly concerned with the lack of progress with addressing recommendations arising from previous reviews and the relative priority these matters, along with other issues pertaining to public transport for people with disability, have been accorded within the National Disability Strategy (NDS) and wider national transport reform agenda. The failure to address recommendations has negatively impacted on people with disability who require accessible services and has provided a great deal of uncertainty to operators and regulators. Implementation of recommendations need to be progressed as a matter of priority.

2.5   Broadly speaking, public transport accessibility has improved, incrementally, since the last DSAPT review. Nonetheless, people with disability continue to experience significant disadvantage due to real public transport inaccessibility.   Daily exclusion from public transport results in people with disability being shut out from their community. It restricts their ability to work; study; shop; socialise with family and friends; be engaged in recreational activities; and, access vital government services. As a result, people with disability are cloistered in communities, stripped of their independence, and denied the right to socially and economically participate on an equal basis with others. People with disability are also unable to undertake spontaneous and unscheduled journeys due to public transport inaccessibility and unreliability. Therefore, public transport accessibility remains a critical human rights issue for people with disability.

3.   Human Rights Framework

3.1   Article 9 of the Convention on the Rights of Persons with Disability (CRPD), which Australia is a signatory to, requires State Parties to ensure people with disabilities access, on an equal basis with others, transport and the physical environment, both in urban and rural areas.[1]

3.2   The National Disability Strategy (NDS) is Australia's key national policy framework for protection, promoting, and fulfilling the human rights of people with disability. All Governments have agreed that the NDS is the mechanism to implement the CRPD and to report to the United Nations against process in achieving the CRPD. Pillar one of the NDS, 'Inclusive and accessible communities' specifically relates to access to public transport and the build environment for people with disability.

3.3   While the Disability Discrimination Act 1992 (Cth) (DDA) makes it unlawful to directly or indirectly discriminate against people with disability in certain areas of public life, significant limitations remain. The DDA supports the development of the Disability Standards as a mechanism to address systemic discrimination and promote equity. The Disability Standards for Accessible Public Transport (DSAPT) is designed to specify rights and responsibilities and clarify obligations under the DDA. The requirement for people with disability to make a compliant for a breach in Standards make this regulatory approach a less that ideal mechanism to drive systemic change and promote equity.

3.4   For several years, DPO Australia and its' member organisations have been using the international human rights framework to raise human rights concerns about public transport related issues, and to push towards positive Whole of Journey experiences for people with disability.   We have raised these concerns at both the domestic level and internationally through a broad range of UN human rights mechanisms.

4.   'Nothing about us without us'

'Talk with people with disabilities and gauge what own needs are- that is the first step in the whole process' (DPOA member)

4.1   People with disability and their representative organisations are to be centrally involved in all aspects of public transport and infrastructure policy that directly affects them. This includes all activities relating to scoping, planning, policy development, implementation, and evaluation.

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[1] UN Convention on the Rights of Persons with Disabilities, Available at: https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-9-accessibility.html

'My housing choices are limited because my transport options are limited' (DPOA member)

4.2.   When transport providers, asset owners, policy makers, and industry do not have strong, effective mechanisms for meaningful consultation with people with disability, public transport inaccessibility is unavoidable and subsequently inevitable.

4.3   Thorough, considered, and meaningful engagement with disability in relation to all aspects of public transport services and infrastructure not only directly facilities improved public transport accessibility, but is also cost-effective. Building accessibility into conveyances, infrastructure, and transport systems is significantly cheaper than undertaking retrospective works of retrofitting or re-design.[2]

5.   Realising the Standards is critical

5.1   A universal accessible public transport system is inclusive and helps to support the full social and economic participation of people with disability. Furthermore, an accessible public transport system provides access to most people at different stages across their life span: e.g. people with diverse mobility levels, such as children and older people, people carrying infants or shopping, people with a temporary impairment, and pregnant women, among others.

5.2   Realising the Standards will also directly improve the social and economic participation of people with disability. Accessible public transport will leverage productivity and wealth creation for both individuals and the economy as more people will access and participate in social and economic opportunities.

5.3   Promoting Universal design principles also facilities accessibility. As outlined in the National Disability Strategy 'Taking a universal design approach to programs, services and facilities is an effective way to remove barriers that exclude people with disability. Universal design allows everyone, to the greatest extent possible, and regardless of age or disability, to use buildings, transport, products and services without the need for specialized or adapted features.'

'Multiple bus stops at one stop is terrible. I cannot tell which bus is which, and surprisingly neither can my guide dog! Drivers are often too disinterested to help me find the correct bus and the bus I need often jumps the queue after non-disabled people have boarded, which just leaves me standing there with no bus!'(DPOA member)

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[2] 'New Queensland Train Delivery doomed 'from day one', inquiry chief declares', Australian Broadcasting Corporation, 10th Dec 2018, Available at: https://www.abc.net.au/news/2018-12-10/queensland-rail-inquiry-new-trained-failed-from-day-one-forde/10600554

6.   Whole of Journey Experiences

6.1   In response to recommendation 4, of the 2nd review of the DSAPT, in 2017 the Australian Government developed and published accessibility guidelines for a 'whole-of-journey' approach to public transport planning. Disabled People's Organisations Australia (DPOA) worked closely with the Government to ensure meaningful consultations with diverse groups of people with disability occurred during the project.

6.2   The guide is designed to 'encourage policy makers, planners, designers, builders, certifiers and operators to think beyond compliance and the physical governance boundaries of services and infrastructure, and to focus instead on people's accessibility needs across their whole journey'.[3]

6.3   DPO Australian congratulates the Government on producing and disseminating this guide as we believe reframing accessibility through a Whole of Journey approach helps to build more seamless, consistent, reliable, and accessible public transport experiences for people with disability.

6.4   People with disability have whole of journey needs that span across industries, jurisdictions, governments and portfolio areas, and modalities of public transport and infrastructure. Therefore, adequate whole of journey planning needs to occur via a whole of government approach, rather than through a piecemeal segmented or siloed system; siloed transport reforms creates islands of accessibility for people with disability.

7.   Diversity and Disability

'For someone with psychosocial disabilities, badly behaved passengers are frightening for us. This is especially true for women with disabilities.' (DPOA member)

7.1   Acknowledging intersectionality and the diversity of disability is fundamental to understanding and responding to the multiple and compounding barriers people with disability experience when accessing or using public transport.

7.2   The DSAPT needs to better incorporate contemporary understandings of intersectionality, by adequately responding to the diverse accessibility needs of all people with disability. This should take into consideration the intersectional

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[3] Department of Infrastructure and Regional Development, 'The Whole Journey: A Guide for thinking beyond compliance to create accessible public transport journeys', 2017, Available at: https://infrastructure.gov.au/transport/disabilities/whole-journey/index.aspx

barriers people with disability experience that arise due to gender, age, Aboriginality, migrant/refugee and LGBTI statuses and identities.

Some examples include but are not limited to:

- easy to access and easy to understand timetabling information or changes to schedule is an accessibility need that is equally as important for some cohorts of people with disability as an accessible build environment is for others, and;

- strong reliance on online or digitised fare systems (e.g. 'tap and go') do enable some people with disability to have more efficient journeys; however same systems can also significantly disadvantage other cohorts of people with disability who are unable to access the internet/find the portals inaccessible, or who require a staff member 'on the ground' to discuss travel and fare arrangements, and;

- Women with disability have additional requirements around public transport safety that need to be incorporated in public transport reform agendas.

'Last minute platform changes and poor guard announcements make trains inaccessible for me'. (DPOA member)

8.   Rural and Remote Australia

8.1   Access to and cost of transport is a critical issue for people with disability in rural and remote Australia. This significantly and disproportionality impacts on Aboriginal and Torres Strait islanders with disability, their families and communities.

8.2   The stark absence of transport infrastructure- let along accessible transport- is an obstacle to inclusive communities, and severely restricts social and economic participation.   Promoting and providing accessible public transport can be as significant as the logistical aspects of transport.

'I live in rural NSW. I'm unable to drive therefore I'm completely isolated'. (DPOA member)

8.3   State and territory jurisdictions need to prioritise rural and remote design into all transport reform agendas. Remote settings need specifically tailored strategies and solutions to address transport issues, across all levels and portfolios of government, as lack of accessible public transport significantly impacts on all areas of life, such as health, education, and employment.

9.   Attitudinal barriers

'I'm harassed by commuters because of my disability'. (DPOA member)

8.3   Attitudinal barriers of commuters and public transport staff can impact on access as much as poor design within the build environment.

8.4   Such barriers raised by our members include, but are not limited to: use of inappropriate, disrespectful, and derogatory language; not taking adequate time required to communicate effectively; impatience and disregard for individual travel requirements; reluctance or resistance to provide assistance when requested; in-flexibility in provision of transport services from transport planning throughout the entire whole of journey.

'I want physically accessibility transport with empathetic staff who have the capacity to sensitively assist people without having to be explicitly asked' (DPOA member)

8.3   Well-meaning staff often assume the support needs of people with disability; they make assumptions of people's transport needs due to the nature of their disability. These assumptions are often misguided-or simply wrong- and stifle independence, choice and accessibility.

8.4   Attitudinal barriers to public transport is a cross-cutting issue that needs to be addressed in a number of ways. Organisations needs to have strong and effective policies regarding disability-inclusive service provision. All public transport managers and staff should be required to attend disability awareness training, as this would directly facilitate increased access to public transport and improve whole of journey experiences for people with disability.

10.   Member feedback on barriers across modes of transport

'Were I live, not all buses are accessible, and there's no way of knowing if an accessible one will turn up or not'. (DPOA member)

10.1   People with disability continue to experience many barriers with accessing or using trains and rail infrastructure. Inaccessibly arises from poor signage, incorrect placement of tactile ground surface indicators (TGSI), lack of lifts or broken lifts, lack of accessible toilets at stations, lack of ramps, lack of/reliance up/inconsistencies associated with direct assistance from staff, and lack of (or muffled) audio announcements, among other things. The lack of, or misuse of, allocated spaces on trains continues to be a significant barrier for people with disability travelling on rail.

'I sometimes get glares and am told to move from the roomy accessibility seats up front (which I obviously vacate for people using wheelchairs or prams) because my disability is invisible. But this means I end up sitting in a seat with no room to have a seizure, and that causes extra injuries when I do.' (DPOA member)

10.2   Many people with disability use taxis as a means of transport; for some people with disability, taxis are their own mode of transport due to lack of access to other modes. Taxi inaccessibility for people with disability often stems from: poor location and accessibility of taxi ranks; inconsistencies around driver service or payment of transport; absence of tactile and/or braille detailing taxi registration details on the inside of the doors; issues surrounding Wheelchair Accessible Taxi (WAT) allocated spaces and design, inconsistencies around safe restraint of mobility aids within WATs; actual number and response time of WATs.

10.3   For many people with disability, taxis are the only way in which they can participate in their communities and travel to and from destinations. The significant cost of taxi travel, however, is prohibitive and therefore is a real barrier for people with disability. The prohibitive cost of taxi travel further isolates people with disability, and limits their social and economic participation, stifling their health and wellbeing.

'I have a bus near my house that goes to town at 9:30am, but I come home in a taxi as there is no bus back from town'. (DPOA member)

10. 4   Many barriers prevent people with disability from using bus services. Concerns around inaccessibility stem from: the lack of and intermittent availability of low door buses; inability of people with disability to travel on buses using their mobility devices; location and general accessibility of bus stops and interchanges; problems with accessing and understanding timetabling information or changes; inability to flag buses when required; challenges around appropriate allocated spaces on buses and their use, thereof; lack of driver training in understanding and accommodating the needs of people with disability.

'There are no bus routes near where I need to go. I rely on my parents or expensive support workers to provide transport'. (DPOA member)

10.5   People with disability have stated that they are regularly unable to complete whole journeys across the tram network throughout Melbourne. For example, they may be able to board a tram at and accessible stop, but are unable to disembark where needed as their required stop is inaccessible. Barriers to tram accessibility are also compounded by unreliable information and updates regarding cancelled low floor trams, or due to the absence of audible or accurate audio announcements.

'We need more staff on the ground to provide direct assistance, especially with service disruptions.' (DPOA member)

10.6 For people with disability, on board access paths, adequate allocated spaces, poor design and/or inappropriate use of boarding ramps remain critical barriers to accessing ferries. Additionally, the pontoon and ramp angles can often be too steep at ferry terminals, often resulting in wheelchair users being unable to independently board.

"Being a person with vision impairment, I rely on meet and assist services when flying. This is the most problematic area of travel for me due to the lack of consistency, reliability, and predictability with being able to access the type of service I need. This occurs even when using the same carrier at the same airport!' (DPOA member)

10.7 Air travel accessibility remains a significant issue for people with disability. 'Two wheelchair' policies adopted by some airline fleets, which allow no more than two passengers requiring the use of wheelchairs on a single flight, are discriminatory and unreasonable. Booking processes need to be improved so that wheelchair users know if the 'two wheelchair' threshold for flights have been reached. Additionally, the rigidity of some 'two wheelchair' airline policies discounts that wheelchair users have varied support or accessibility needs, i.e. some passengers travelling with light weight foldable wheelchairs can independently self-transfer between seats.

10.8 Policies pertaining to aisle wheelchair usage are also known to be frustrating for people with disability. For example, many passengers who utilise wheelchairs or mobility aids are often required to wait long periods sitting in cabin wheelchairs at departure gates, waiting to board. Many other ongoing issues relating to accessibility of signage, wayfinding, poor curbside assistance, and inconsistent service provision still prevent people with disability from undertaking whole journey's across air transport.

11. Accessibility of Ridesharing

'I'm discriminated against because I have a guide dog. Uber don't let dogs in their cars- it's absolute rubbish!' (DPOA member)

11.1 Considering ride-sharing operators and drivers are in effect providing public transport services, they should be held accountable under the DSAPT. The lack of national regulation, and growth in new modes of ride-sharing services, is already impacting on the sustainability of regular taxi services and wheelchair accessible taxis (WATs). Many people with disability will continue to rely on these forms of specialist taxi transport in preference to other point to point service providers. Therefore, it is critical that the national monitoring and regulation of ride-sharing services is covered by DSAPT to ensure of viability of regular taxis and WATs

11.2   Key barriers remain for people with disability when accessing point to point ride-share services. These barriers need to addressed under the DSAPT. Such barriers include but are not limited to: inaccessibility of vehicle, inaccessibility of booking/payment services, lack of driving training, and driver's not accepting guide dogs and/or mobility devices in the vehicle. Also some people with disability, such as those with low vision, have difficulty with identifying a ride-share vehicle, which is both an access and safety issue.

11.3   Point to point and ride-share transport operators should be required to address the range of access barriers to their services; in addition, these point to point transport service providers should be required to ensure their drivers are appropriately trained in communicating and assisting passengers with disability.

12.   National Consistency across jurisdictions

12.1   There remains a great deal of inconsistencies of taxi subsidies across States and Territories, with some States further considering cashing in subsides for those people participating in the National Disability Insurance Scheme (NDIS). Although interstate subsidies exist, people with disability have reported great difficulty using these subsidies when travelling interstate, because driver's claim they are either unaware of the system or no longer accept interstate subsidies; this is exacerbated by there being different systems across states e.g. NSW uses a voucher system, Victoria uses a card system.

12. 2   Inconsistencies also arrive from inaccessible payment systems, and the DSAPT needs to address these. Payment systems pose a direct barrier to accessing public transport.   A full range of payment options should be provided e.g. cash, card, smartphone, over the phone payments, and 'in person' at stations. In addition to meeting access requirements, payment systems must be transparent and be able to be tracked by passengers with disability.

12.3   A payment system that relies solely on the internet or smartphone technology will not be accessible for many people with disability, nor will a system that requires payment by credit or debit card.

12.4   DSAPT needs to provide for a range of payment options that suit the varied accessibility and financial needs of people with disability

'I applied for transport support from the NDIS but was deemed ineligible' (DPOA member)

13.   Affordability of Public Transport

'My transport funds don't match the cost of living in Sydney' (DPOA member)

13.1   Considering people with disability are more likely to live in poverty, be unemployed, underemployed, or work in casualised or low-wage position, the financial affordability of public transport remains a significant barrier.

13.2   Affordability of transport continues to be a key barrier to social and economic participation for many people with disability who, because of the inaccessibility of other public transport options, rely on the use of either private vehicles, point to point services and taxis for their transport needs

13.3   Most states and territories offer some forms of taxi subsidy scheme, whereby a proportion of the taxi fare is subsidies, which plays a critical role in addressing financial barriers to public transport. Nonetheless, although vital, these subsidy schemes only slight ease the transport cost pressures experienced by people with disability.   Subsequently, people with disability are forced to prioritise their transport needs due to limited resources. The DSAPT, as the regulatory framework for accessible public transport, must take into account financial and adorability barrier to public transport, including the availability of incentives, subsidies and concessional or free fares.

13.4   Financial affordability regarding transport for people with disability is further compounded by changes being brought about with the roll out of the NDIS. Many people with disability in the NDIS have indicated that their transport needs are not being met within their plan, either because of the complexities of predicting and budgeting for the transport needs in advance, and/or the allocated transport funds in their plans are not adequate or less than what they previously received.

13.5   NDIS participants are required to predict what level of support they will require for future participation needs in order to include appropriate funding for transport in their NDIS plan. This becomes difficult when considering a person's transport requirements may fluctuate over time and on the reason for travel. For example, travel to regular employment is likely to be more predictable than travel to social outings or accessing vital government services.   Participants are often forced to choose between funding for economic participation, and other essential areas of life, such as access to medical and health services, over actively participating in social and community activities.

13.6   The impact of the NDIS rollout on the national mobility allowance and state taxi subsidy systems result in some people with less supports for transport than they require; this is particularly the case for people with disability who lost access to the mobility allowance or state-based subsidies who are not NDIS eligible.

14.   Equivalent Access and Unjustifiable Hardship

14.1   Currently, there is too little rigor around process regarding Equivalent Access or Unjustifiable Hardship.

14.2   Transport operators, designers, builders, or asset owners are reluctant to explore Equivalent Access solutions due to the perceived risk that the outcomes may not be DSAPT compliant. However, if the correct process is followed as defined by the DSAPT, Equivalent Access solutions are a performance-based approach that is fully DSAPT compliant.

14.3   Uncertainty of DSAPT compliance sees designers, asset owners, operators or their legal representatives reluctant to explore Equivalent Access solutions. Subsequently, research or meaningful consultation with people with disability is avoided, resulting in the denial of accessibility equivalent alternatives for people with disability

14.4   Rather than limit accessibility through risk aversion, the DSAPT needs to strengthen the Equivalent Access process; a process that directs asset owners to meaningfully engage with people with disability and the disability advocacy sector in an effort to reach mutually agreeable solutions ensures Equivalent Access solutions are compliant and provide accessibility outcomes for people with disability.

15.   A Strong Reporting Framework

15.1   States and Territories are struggling to achieve minimum DSAPT compliance benchmarks. Subsequently, time extensions or exemptions are becoming common practice at the detriment of people with disability

15.2   'Inclusive and Accessible Communities' is a listed pillar of the National Disability Strategy, the key national framework for fully implementing the CRDP across Australia- yet, there is no real action plan for driving public transport accessibility across jurisdictions

15.3   The Council of Australian Governments (COAG) Transport and Infrastructure Council has a broad remit but is not tasked or resourced with facilitating or monitoring accessible public transport agendas. Therefore, there is no independent, state/territory or Commonwealth mechanism that is responsible for driving DSAPT compliance and accessible whole of journey experiences for people with disability.

15.4   There is a need for 'Whole of Journey Access Audit' regulatory function, or something very similar, to exist at a state/territory level, tasked with overseeing and

monitoring against each jurisdiction and their plan to achieve full DSAPT compliance. This work would directly stem from- and feed back into- a national transport action plan that would sit under and align with the priorities within the National Disability Strategy.

15.5   The Whole of Journey Audit function could be responsible for:

- Working with the state/territory Government and people with disability to develop reasonable, achievable, and deliverable transport accessibility action plans
- having responsibility for collecting and collating both transport usages and DSAPT compliance data; this in turn would better inform local transport agendas and could feed up to federal departments to provide a national insight into public transport accessibility for people with disability, reporting against our expectations under the CRPD.
- Developing and undertaking 'Disability Impact Statements' on all public transport works, services and infrastructure to ensure the needs of people with disability have been heard, considered and adequately incorporated into all scoping of transport reform projects. These Disability Impact Statements should be assessed and undertaker on a sliding scale/proportional basis i.e. more thorough research and analysis should occur on changes to an entire bus fleet, compared to proposed changes to one bus route.
- Developing strong working relationships with local Disabled People's Organisations, disability advocacy organisations and local government to ensure people with disability are meaningfully engaged in all transport reform agendas

15.4   These Whole of Journey Audit mechanisms need to be adequately resourced to ensure they effectively perform their functions. A mechanism like the above stated function would facilitate increase public transport accessibility for people with disability. Additionally, it would be a cost-effective as jurisdictions would be prevented from expensive retro-fits or redesigns, and Government would not have to resource and manage ongoing exemption applications.

16.   Best Practice Clearinghouse

16.1   As noted in previous DSAPT reviews, people with disability would benefit from a 'best practice clearinghouse' that collected and disseminated best practice solutions and ideas relating to accessibility public transport.

16.2   This clearinghouse needs to be adequately resourced and developed and owned in partnership between people with disability and, research institutes and the Commonwealth Government. It would be a repository that evaluates, showcases, and disseminates best practice resources on all issues pertaining to public transport and infrastructure accessibility.

17.   Recommendations

- Commonwealth to work with State and Territory governments to allocate adequate resources to implement recommendations from previous DSAPT reviews, as a matter of urgency.

- The DSAPT should be amended to strengthen and clarify equivalent access processes. Genuine engagement with people with disability and their representative organisations during equivalent access processes leads to equivalent access solutions. Stronger equivalent access processes create accessibility; exemption and unjustifiable hardship outcomes need to be limited as they deny accessibility.

- The Commonwealth Government need to develop an independent, national framework and coordinating mechanism:

  1) in partnership with people with disability, and their representative organisations, to ensure all transport reform agendas are informed by people with disability and responsive to their diverse accessibility needs;

  2) for driving DSAPT compliance and monitoring of whole of journey transport action plans at both national, and state/territory levels, and;

  3) to view transport as a national, whole of Government issue that cuts across jurisdictions, government portfolios and industry sectors, and;

  4) To respond to the diverse and intersecting barriers to accessible public transport experienced by people with disability, including but not limited to DSAPT compliance, and incorporating issues such as financial and attitudinal barriers.

  5) To establish the collection of publicly available data and evidence on the extent and experience of how people with disability are able to access public transport, on an equal basis with others.

- The Commonwealth Government is to work with state and territory governments to fund an independent 'best practice' clearinghouse that collects and disseminates best practice solutions pertaining to accessible public transport and infrastructure for people with disability.