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Disability Transport Access Secretariat
Transport Access Section
Road Safety and Transport Access Branch
Department of Infrastructure and Transport
GPO Box 594
CANBERRA ACT 2601

Dear Sir/Madam

**Submission to 2012 Review of the Disability Standards for Accessible Public
Transport 2002 (Transport Standards)**

Thank you for the opportunity to make a submission to the *2012 Review of the Review of the Disability Standards for Accessible Public Transport 2002* (the Transport Standards).

The role of the South Australian Commissioner for Equal Opportunity is to administer the *Equal Opportunity Act 1984* (SA). I am able to accept complaints of discrimination in areas such as employment, goods and services, housing, and education for grounds such as race, age, sex and disability. This includes complaints of discrimination in relation to accessibility of public transport.

In South Australia, as in all other states, there has been progress toward more accessible public transport services and there have been some improvements since the commencement of the first review of the Standards in 2007. However, there is still a long way to go to ensure that the Transport Standards are implemented to their full extent within the timeframes set out in those Standards.

1. Buses

In South Australia, approximately 87% of buses are now accessible. However, the deployment of accessible buses is not, as we understand, particularly reliable or predictable. One of the messages we are hearing from passengers is that they cannot rely on public buses as their preferred method of travel. We have heard stories of a person requiring wheelchair access and who use buses on a daily basis for travel to and from work who is required to telephone the service provider each day to ascertain whether the bus on their particular route at a particular time will be accessible. This is despite the fact that this person has travelled by bus, on the same route, at the same time and on the same day for years. The fact that the onus is on the individual to check every day whether their bus will have wheelchair access is potentially discriminatory, when it seems reasonable, given the predictability of the requirement, that a service provider should be able to provide a permanent accessible bus.

Given the Standards have been in place since 2002 and also in light of the milestones set out in the implementation timetable relating to percentages of accessible buses, providers should be expected to have adequate numbers of accessible buses in order to provide a guaranteed accessible timetable for passengers. Further, timetables should be able to depict which routes and/or times have accessible buses, thereby eliminating the requirement for people to ring to enquire. These timetabling issues should be addressed as a matter of priority.

One of the key recommendations contained in the 2007 review related to the exclusion for dedicated school bus routes. I support that exclusion to the extent that students with disability are not in any way discriminated against or excluded from accessing public transport. I believe this is achievable through proper consultation with relevant stakeholders such as DECD (Department of Education and Childhood Development).

Further, whilst all buses on weekends in South Australia are accessible, this is not promoted or advertised. I would be pleased to see wider promotion of this service to maximise the opportunity for people with disability to access public transport on weekends.

2. Trains and Trams

Accessible train transport has made significant and welcome progress in South Australia. For example, our stakeholders advise that the audio announcements are very clear. There are still existing issues, however, with the infrastructure around the trams, such as platform gaps, which create limitations on independent access. Despite feedback provided by key stakeholder groups during the construction of the tramline extension and new platforms in Adelaide in 2009, the height of the platforms relative to the doors of the trams do not match up, creating gaps and limiting independent access for people with disability. Access can only be achieved through ramps. This was a lost opportunity to allow independent access with dignity.

3. Taxis

The main ongoing issue in South Australia with taxis is response times (exacerbated by the limited number of accessible taxis) and the ongoing failure to provide an equivalent service for people requiring accessible taxis in terms of response times. Stakeholders tell us that South Australia is performing poorly in this area compared to progress in other states and it remains a significant issue for people with disability. There are currently only approximately 100 accessible taxis in South Australia. Further, these are all predominantly located in metropolitan Adelaide with few or no accessible taxis available in regional areas.

4. Airport Shuttle Buses

Stakeholders have raised concerns about airport shuttle buses which are all privately owned in South Australia and none of which are accessible. This appears to be an area which goes "under the radar" of compliance and so arguably needs to be addressed in this review of the Standards. Whilst privately owned and a fee is paid, these services are available to all in the community but are not accessible to all.

The 2012 review is an opportunity to re-visit recommendations arising from the 2007 review, which recommendations were, on the whole, not adequately implemented. Failure to address those recommendations is restricting progress in Australia towards a proper and robust system of accessible transport where people have every opportunity possible to participate in community life with independence and dignity.

If you would like any further information regarding the above submission, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in blue ink that reads "Anne Gale". The signature is written in a cursive style with a large, stylized initial "A".

ANNE GALE
COMMISSIONER FOR EQUAL OPPORTUNITY