



LINK COMMUNITY TRANSPORT INC.

Response to the Review of the Disability Standards for Accessible Public Transport prepared by the Allen Consulting Group. 31/03/08

1. Do you consider that this draft report has addressed the key issues of importance to the review? If not, what are the other issues do you consider are important to this review?

The review has identified six key problems to be addressed to improve the effectiveness and efficiency of the Transport Standards.

1a. Incorrect or inappropriate prescription in the Transport Standards:

While it has been addressed that technical information and expertise is important to be included in the Accessible Public Transport Jurisdictional Committee (APTJC), it should also be identified that practical expertise from stakeholders such as service users and community transport providers be included within the membership of the APTJC..

2a Uncertainty around implementation and compliance

The main key to the success of the options put forward here is that all stakeholders are educated in the terms of reference and boundaries of each body and the process that needs to be followed to place complaints regarding non compliance.

3a Gaps in information for providers in operating accessible public transport

The sharing of information and best practice should be encouraged to encompass all forms of transport. This should include community, taxi, public and school transport modes. Methods that are used within a small community transport service may well be able to be adapted to other transport modes and vice-versa. This key problem area should include all types of transport in its title and scope, not just public transport. This would support broader transport inclusion across multi transport modes.

4a. Reliance on individual complaints process to ensure compliance

The concept that is put forward is based on individual complaints but it is important to also examine any common theme of complaints received within all forms of transport. Consideration should be given to key learnings and knowledge sharing such that complaints raised about one transport mode may not occur within another transport mode but some solutions to accessibility of transport adopted in other transport modes may benefit an area that is experiencing complaints. This would need to be addressed as identified through a peak body.

5a. Inappropriate exclusions within the Transport Standards

Amendment to the exclusion of community transport within the Transport Standards has been addressed in further detail in Section 3 of this submission. If all types of transport services are accessible then they would be available for use by all members of the community extending to sporting groups and people with physical disabilities. It is the costs that may be involved in making school buses and community transport vehicles accessible that will be one of the greatest barriers to implementing Draft Recommendations 2 and 3 of the Review.

6a.Lack of standard compliance reporting framework and data on patronage

In addition to those options put forward in the Review, an option could be to engage those current organisations who provide services to people with disabilities and engage them to develop a tool to measure their use of all modes of transport. The current HACC (Home & Community Care) Service Co-ordination Tool Template (SCoTT) is a universally used needs identification tool that could be used to gather this data on the use of public transport, taxi, school, and community transport

- 2. Are there options to address these problems that the review has not considered? If so, please provide details on these options and your assessment of their costs and benefits (including supportive evidence)**

This review has used a qualitative assessment technique to assess options under each identified problem

Other review conclusions that are relevant to community transport that should be addressed:

Part1.15- disability aides (pg 231 of draft report) – a clearer definition of a mobility aides and the assistance that a person can expect when using these on all modes of transport must be clarified and be more defined.

Part 3.1 Manoeuvring area. A recommendation should identify the current lack of space that is available to set down and off load a person in a wheelchair from a community transport vehicle within a standard disabled car park space. Recommendation should be that disabled car parking spaces are Nine metres in length.

Part 7. Waiting areas should have clear dimensions and standardised recommendations on what amenities and features the waiting area should include. These should include seat height, arm rests on seats to assist with mobility, ramp, lighting, tactile points, weather protection. It is recommended that these become standard at all activity and transport hubs.

Part 20. Lighting. Recommendation that any waiting areas should have lighting standards attached to them if the waiting area is situated within an activity or transport hub.

Part 27. Information. None of the recommendations have addressed the issue of different languages or symbols to address issues within all modes of transport.

Part 30. Belongings.

Currently community transport organisations experience issues around the amount, size and weight of shopping and personal belongings that passengers wish to take with them on a vehicle. This is mainly in regards to groceries, personal shopping and other belongings when accessing their community. A recommendation around maximum carry on cargo on community transport vehicles may assist with the clarification of this issue. This would also address Occupational Health & Safety issues within community transport where drivers are often required to carry heavy cargo on and off vehicles for passengers.

- 3. Do you have evidence to either support or refute the assessment of options in chapter 13 of this report? Evidence may include information on the relative magnitude of impacts between options.**

Re : Draft Recommendation 3 : Amend the exclusion for community bus services to include in the Transport Standards those community services whose purpose is to service people with a disability or older people.

Comment :

Currently, the number and location of community transport organisations can be difficult to identify as most community transport is undertaken as an ancillary task by organisations that have a different primary focus, such as Community Health Services, Councils and Disability Service Organisations. Some small agencies operate in a very small area within the community with a very defined client group and the ability of these services to meet the recommended new Transport Standards may be difficult as transport is not their core business and it may be an unfunded aspect of their service delivery. To implement the recommendation that community transport no longer be excluded from the Standards will likely cause financial and operational hardship to most agencies providing a community transport service.

Evidence: Current size of disabled car parking in public areas is not sufficient to allow for safe loading and unloading of wheelchair passengers within minibus vehicles, such as Toyota Hi Ace vehicles(the most commonly used minibus vehicles for community transport). This is also the case for passengers/drivers of sedans and other vehicles that are used for community transport purposes and by people with a disability who provide their own transport in vehicles.. This lack of suitable sized disabled car parks is an issue in community hubs, activity centres and shopping centres. The larger community buses (22 seaters) that are usually owned by local councils and community health services currently do not have designated safe parking or drop off/pick up areas to embark and disembark their passengers safely. The disabled car parking bays are well out of the size needed for this task. The recommended standard size of a disabled car park space is nine metres in length.

Evidence: Currently the Australian Standards for Wheelchair Occupant Restraint Systems allows for the interpretation within a preface of “what is a greater risk.”. In a recent case in Melbourne, this has been interpreted differently by two community transport organisations. With this example, one agency interpreted the Standard according to the client need, the other identified passenger and driver safety. The option of an advisory body would assist with these types of situations however, the Standards should also strive to be more direct and clear within their wording.

The current shortfalls around the use of mobility aides to assist people in accessing the community safely should be addressed. Mobility aides, such as walking frames are viewed as an individual item that suits each person’s disability. The Standards for Vehicle Occupant Restraint Systems are difficult to apply to these particular aides within community vehicles. As some aids can be folded, some cannot, some are able to be restrained safely and appropriately within a vehicle and some are not. Current best practice uses some of the resources within the community transport vehicles (e.g. seats allocated to the restraint of aides) and so it then decreases the amount of resources for the community transport agency (reduces number of passengers that can be accommodated on vehicle).

Evidence: If the inclusion of community transport services is adopted then the funding and acknowledgement of community transport will have to be aligned with all other transport services that are obliged to comply with Standards and regulations for transporting passengers of all abilities and mobility needs. ***The current cost of installing a new hoist and occupant restraints for one wheelchair position in a community transport vehicle is \$25,000.00 (pricing correct as at 31/03/08).***

The current shortfalls of funding for community transport in Australian states and territories would preclude compliance to the Recommend Standard 3 and so state or federal bodies would need to take on the responsibility of the community transport sector and fund services and vehicles accordingly. Traditionally community transport has been utilised by older people or people with disabilities however it has now broadened to be a growing need for socially isolated and transport disadvantaged people of all ages and all abilities.

Evidence: Community transport is also offers an option to passengers who fit within an eligibility criteria that can be guided by the funding that is received to assist with the service. These passengers now include young mothers with young babies and children, older persons who may no longer feel confident to drive their own vehicle past their local area, parents looking for options to get children from child care to respite or other care programs while parents are at work.

The inclusion of community transport would standardise the resources offered to the passengers and in time would allow greater accessibility to people with disabilities however there are also parts of the community transport sector that would not be able to afford to comply with standards and regulations as they now stand and through their current funding bodies. Many organisations have volunteer drivers who may not want to have the level of training required to comply with regulations.

Evidence: In a recent example in Melbourne, a large electric wheelchair was not able to be restrained using the Standard format of attaching restraints to the chassis. This posed a significant safety risk to the client and a duty of care risk to the agencies involved. One community organisation ceased transport and advocated with wheelchair and occupant restraint manufacturers to seek a better outcome for the individual client and systemically . The other community transport organisation did not agree that this was an issue and continued to transport using the unacceptable restraint option. The initial community organisation resolved the issue and then shared the outcome with the other community transport organisation.

Comment :

The ability to collect statistics on the patronage of community transport is currently not possible within the jurisdiction of Victoria. This is because Victoria is the only State in Australia that does not fund community transport per se. This creates difficulty for gathering evidence and data on the important role that community transport plays in supporting a citizenship model of accessibility. It also is an implication in the solution to how agencies that provide community transport will make their vehicle fully accessible should Draft recommendation 3 of the Allen Consulting Group report be upheld.

4. Do you consider that implementing the draft recommendations will involve costs to government or non government organisations? If so, please provide any estimates of these costs.

Costs would be incurred at all levels to implement the draft recommendations.

These costs would come under the following criteria:

Education program: educating all stakeholders

Assessment protocols and training of staff across all modes of transport.

Vehicle Purchase & Vehicle accessibility fit out – to ensure vehicle is fully accessible.

As identified on the previous page, ***the current cost of installing a new hoist and occupant restraints for one wheelchair position in a community transport vehicle is \$25,000.00 (pricing correct as at 31/03/08).***

Community Transport organisations may not be able to afford to be fully compliant with the Transport Standards and therefore may not be able to continue operation leading to a community cost and reduced access to the community.

5. Do you consider that the criteria used in the qualitative assessment of options are appropriate? Do you have suggested changes to these criteria?

In support of the new activities and recommended, this review has suggested that a new consultative framework with expanded roles for both APTNAC and APTJC.

The application of a Quadruple Bottom Line approach (social, economic, environmental, and cultural) to criteria would also be a useful approach to the criteria.

6. Do you consider that the proposed framework is the best approach to implementing the recommendations from this review? If not, how could it be improved?

It is unclear how the nine Draft Recommendations were weighted or prioritised. By example, the accessibility issue of community transport vehicles, which is addressed in Draft Recommendation 3 does not appear to be backed up by submissions, feedback or evidence of this issue being raised in the community during the consultation process for the Review. Thus, what criteria were used to place this issue as one of the key recommendations given its lack of substantive comment or feedback within the Review Process and within the body of the Review Document ?

From a community transport perspective it would be costly for all community transport organisations to be compelled to apply with all parts of the Transport Standards. It will require increased recognition and funding of community transport to achieve full compliance with the Transport Standards. Further, community Transport would benefit from the standardising of mobility aides and labelling of these aides. It is recommended that there would then be a need to establish a body to monitor the standards and protocols of the mobility aides that are currently being used as this impacts on people with a disability being able to access transport.

To collect broader transport mode data, the recommendation for inclusion of a question regarding the use of public transport patronage within the census should be expanded to include all modes of transport (i.e.- school, taxi, community transport).

Submission completed by :

**LINK Community Transport
5/105 Newlands Rd
Coburg North. VIC 3058**