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Dear Sir/Madam

### **Draft Review of the Disability Standards for Accessible Public Transport 2002 (DSAPT)**

People With Disabilities (WA) Inc -PWD(WA)- is the peak disability consumer organisation representing the rights, needs and equity of all Western Australians with a disability.

PWD(WA) welcomes the opportunity to respond to the five year review of the Accessible Public Transport Standards and applauds the various methods taken to consult on an issue which clearly involves many cross sectors. Whilst recognising that accessibility problems certainly do still exist with the transport system, PWD(WA) acknowledges that a number of improvements in transport have occurred over the years. Implementing the recommendations outlined in Chapter 13 of the Draft Review of the Disability Standards for Accessible Public Transport 2002 (DSAPT) will certainly further positively impact the DSAPT.

Of particular note, people with disabilities wanting to legally pursue breaches and concerns are often worried about the extreme personal cost to themselves be this financially, legally or health wise. The suggested change in Human Rights and Equal Opportunity Commission's (HREOC) role is welcomed as it would remove the onus from the individual. PWD(WA) supports options 4B and 6B regarding empowering HREOC to self initiate and refer cases of breaches of the Transport Standards directly to the Federal Court, similarly to ASIC and other key consumer body representative organisations, if necessary. Clearly this is a decision that would not be taken lightly.

PWD(WA) supports Australian Federation of Disability Organisation's (AFDO) concerns and recommendations about HREOC gaining this power. Other reforms might ensure against possibly undermining HREOC's impartiality between complainants. These could include reforming the Disability Discrimination Act to simplify the process for advocacy groups to make complaints in their own right, and increasing funding available for public interest cases to be tested in the Federal Court. HREOC's power could become an incentive for organisations or businesses that breach the transport standards to work towards reversing the situation.

Specific guidelines and Action Plans are extremely valuable tools for ensuring compliance and involving people with disabilities in the planning and evaluation stages. PWD(WA) encourages states and territories to share best practise of accessible public transport. We also welcome increasing technical expertise and improving guidelines. This includes due consideration of the myriad of specification details relating to mobility aids when introducing new transport modes.

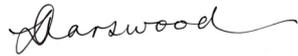
PWD(WA) supports option 5B to include dedicated school bus services and community bus services transporting people with a disability or older people within the Transport Standards. This will lessen the students with disabilities' isolation, which in turn will foster better relationships with their peers. Burdens faced by parents and carers, not to mention the load on the Multi Purpose Taxis service to transport students to and from schools, will also greatly benefit from this.

Regularly informing and involving people with disabilities, their families and carers in all aspects of change, including how they may source accurate information and receive reliable services, will be

paramount throughout the process. This will enable transport users to also suitably inform providers of any concerns or implications which may arise from changes to the current system.

In conclusion PWD(WA) supports the proposed recommendations. Once again we thank you for the opportunity to comment on the DSAPT.

Yours sincerely

A handwritten signature in cursive script that reads "Garswood".

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JOINT EXECUTIVE OFFICER  
PEOPLE WITH DISABILITIES (WA) INC