



Council of Social Service of New South Wales

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27 March 2008

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Dear Sir or Madam

The Council of Social Service of NSW (NCOSS) would like to thank you for the opportunity to comment on the Review of the Disability Service Standards for Accessible Transport Draft Report.

NCOSS is an independent non-government organisation and is the peak body for the non-government human services sector in NSW. NCOSS works with its members on behalf of disadvantaged people and communities towards achieving social justice in New South Wales.

It was established in 1935 and is part of a national network of Councils of Social Service, which operate in each State and Territory and at Commonwealth level.

NCOSS membership is composed of community organisations and interested individuals. Affiliate members include local government councils, business organisations and Government agencies. Through current membership forums, NCOSS represents more than 7,000 community organisations and over 100,000 consumers and individuals.

The Disability Service Standards (Transport Standards) are an important part of ensuring access to public transport for people with disabilities. As noted in your report they have the added benefit of improving access to public transport for a range of other people such as older people and people with prams. It is encouraging to see the positive changes that are happening as a result of the Transport Standards. However, as the report notes, there are many areas that still require change or modification now that the implementation phase has been running for 5 years.

Overall NCOSS believes that the report has addressed the key issues of importance for the current review. However, rather than answer the questions for stakeholders listed in the review, which we believe would be better answered by people with disabilities and their representatives, we have made some general comments about the proposed options for addressing the issues raised in the report.

Incorrect or inappropriate prescription in the Transport Standards – Option 1A
(p.57)

NCOSS sees the value of making technical amendments to the Transport Standards in order to address the problems that other various prescriptive requirements and the Australian Standards cause.

However, while the Australian Standards are not compulsory they are the minimum requirement that services are expected to meet. They are also used by organisations such as Work Cover when assessing issues related to occupational health and safety. Therefore any technical amendments must be an improvement on the relevant Australian Standard and not a reduction in the minimum requirement.

If the Australian Standards are resulting in the exclusion of people with disability, or are inappropriate for certain situations, it would be beneficial to see the issues raised in this review leading to an evaluation and improvement of the relevant Australian Standards.

Uncertainty around implementation and compliance – Option 2A
(p.160)

NCOSS agrees that the mode of transport should determine the guidelines. However, where a similar issue is to be addressed, across all modes of transport, then all modes of transport should be required to meet the highest level or standard, not the most basic requirement. There must also be cross-checking to ensure consistency across all modes is not lost.

People with disabilities and their representatives must fully participate in the development of any guidelines.

Gaps in information for providers in operating accessible public transport – Option 3A
(p.162)

NCOSS supports this option as long as the sub-committee has sufficient representation of people with a diverse range of disabilities and their representatives.

NCOSS also recommends changing the wording of the third dot point so that it reads 'Work with HREOC on transport issues in relation to assistance animals under the DDA (led by HREOC)'.

NCOSS supports the Best Practice Clearinghouse however more detail is needed in how the Clearinghouse will ensure dissemination of information. There will also need to be some type of recording of who accesses the information, which can be used as part of the ongoing review of the implementation of the Transport Standards. For example, a service has accessed information and then made no changes to their services.

Reliance on individual complaints processes to ensure compliance – Option 4B
(p.165)

NCOSS agrees that HREOC should have increased referral powers and be able to instigate cases in the federal court where HREOC identifies broader or systematic non-compliance. However, while NCOSS agrees that a complaints process is essential; NCOSS considers a complaints process to be only one aspect of a range of compliance mechanisms. There are a myriad of these including consumer satisfaction surveys, focus groups and ongoing contact with consumer groups, to name a few.

Inappropriate exclusions within the Transport Standards – Option 5D
(p.166)

In many rural and regional areas school buses are the only form of public transport available. Not only are they an important part of accessing school but in being able to participate in the community. NCOSS supports the inclusion of school bus services within the compliance requirements for the Transport Standards.

NCOSS also agrees that community transport services should be included under the requirements of the Transport Standards. However, these services are government funded services and are significantly underfunded, with stretched resources and high demands. They also face difficulties in being able to replace current vehicles. Therefore the Government must agree to fund the retro-fit or change-over to an accessible vehicle for these services if they are required to comply with the Transport Standards.

Lack of a standard compliance reporting framework and data on patronage – Option 6E
(p.168)

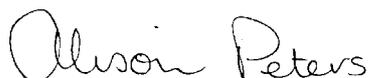
NCOSS supports this option. Consistent data collection and reporting is essential in being able to effectively review and monitor compliance with the Transport Standards.

Conclusion

In conclusion NCOSS is generally supportive of the options proposed in the draft report, with the amendments as discussed above.

If you would like any further information please contact Samantha Edmonds, Deputy Director Policy and Communications on (02) 9211 2599 ext 111 or samantha@ncoss.org.au

Yours faithfully



Alison Peters
Director