

PEOPLE WITH DISABILITIES (WA) INC.

**SUBMISSION FOR THE 2012 REVIEW OF THE DISABILITY STANDARDS FOR
ACCESSIBLE PUBLIC TRANSPORT**

MAY 2013

People with Disabilities (WA) Inc. (PWdWA) would like to thank the Department of Infrastructure and Transport for the opportunity to comment on the Disability Standards for Accessible Public Transport.

PWdWA is the peak disability consumer organisation representing the rights, needs and equity of all Western Australians with disabilities via individual and systemic advocacy.

PWdWA is run BY and FOR people with disabilities and as such strives to be the voice for all people with disabilities in Western Australia.

This submission is based on the feedback we have received from people with disabilities, their families and carers.

People with Disabilities (WA) Inc.
President: Monica McGhie
Executive Director: Andrew Jefferson

If you require further information, please contact:
Dr Amber Arazi
People with Disabilities (WA) Inc.
Oasis Lotteries House, 1/37 Hampden Rd, Nedlands, WA 6009
Email: feedback@pwdwa.org
Tel: (08) 9485 8900
Fax: (08) 9386 1011
TTY: (08) 9386 6451
Country Callers: 1800 193 331
Website: <http://www.pwdwa.org>

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PART 1: BACKGROUND

The Disability Standards for Accessible Public Transport 2002 (the Transport Standards) were made under Section 31 of the Disability Discrimination Act 1992 (DDA), and took effect on 23 October 2002. Part 34 of the Transport Standards requires the Minister for Infrastructure and Transport, in consultation with the Attorney-General, to review the efficiency and effectiveness of the Transport Standards.

A review is required within five years of the Transport Standards coming into effect and every five years thereafter. The current Review commenced in 2012 and will assess whether discrimination has been removed, as far as possible, according to the requirements for compliance set out in Schedule 1 of the Transport Standards (see Appendix 1); and advise on any necessary amendments to the Transport Standards.

The Transport Standards set out the minimum accessibility requirements that providers and operators of public transport must comply with, as well as ensuring that access to transport is consistently improved. The transport standards recognise that access to public transport enables people with disabilities, their families and their carers to fully participate in community life and also benefits many older Australians and parents with infants in prams.

The transport standards apply to:

- buses and coaches
- trams
- trains
- taxis
- aeroplanes
- ferries.

The transport standards also set out minimum standards for premises including:

- access paths
- manoeuvring areas
- ramps and boarding devices
- allocated spaces
- handrails and grab rails
- doorways, lifts, stairs, toilets, symbols and signs
- the payment of fares
- access to information about transport services.

Compliance with the requirements set out in the standards provides operators with protection from a complaint of unlawful discrimination.

For further information see the following websites:

[Attorney-General's Department](#)

[Department of Infrastructure and Transport](#)

PART 2: WESTERN AUSTRALIA'S TRANSPORT INITIATIVES

Since the 2007 Review, the WA Government and other agencies have developed a number of initiatives to improve access to public transport services for people with disabilities.

These include:

- Access and Mobility Maps
- Prepare for Take Off Air Travel Tips
- Pensioner SmartRiders for Carers
- Equivalent Access Program
- Improved Emergency Management Systems
- Bus and Train Station Upgrade Program
- Bus Replacement Program
- Bus Stop Accessibility Works Program
- Transwa Coach Upgrades
- Transperth Train System Upgrades
- New Cash Ticketing Systems and Fare Gates
- Accessible Ferry Service
- Program for Improved Multipurpose Taxi Services
- Transit Officer and Driver's Disability Awareness Manuals
- Disability Awareness Training for Frontline Staff DVD
- Transperth Accessible Services and Ticketing Brochure
- Transperth Station Access Website Information Module
- You're Welcome Access WA.

The initiatives listed above go some way to improving access to public transport for people with disabilities, though there are still significant issues. These are identified in the next two sections of this submission.

PART 3: PUBLIC TRANSPORT ISSUES

PWdWA provides individual and systemic advocacy services for people with disabilities experiencing discrimination in areas including public transport. These services are defined below.

Individual Advocacy: Advocates uphold the rights and interests of people with all types of disabilities on a one-to-one basis by addressing instances of discrimination, abuse and neglect. In partnership with the person with a disability, advocates work through an individual advocacy plan with clearly defined goals.

Systemic Advocacy: Systemic advocates work in partnership with groups of people with disabilities, advocacy agencies and other relevant organisations and individuals to influence positive change to legislation, policy and service practices; with the goal to remove barriers and ensure the rights and interests of people with disabilities are safeguarded and upheld.

In May 2013, PWdWA conducted a review of our individual and systemic advocacy databases and formulated a list of transport issues. Further to this, we consulted with people with disabilities, their families and carers through one-to-one consultations and via a Public Transport Survey.

For the full set of issues please refer to:

Appendix 2: PWdWA's Public Transport Survey Responses

Appendix 3: Transport Issues – Database Review and Consultations

We urge the Department of Infrastructure and Transport to review these issues against the Transport Standards and consider strategies that can be put in place to ensure compliance. Part 4 of this submission considers in greater detail some of the more systemic issues that we are aware of that are not just confined to single incidents of non-compliance.

4. RECOMMENDATIONS

The issues listed in Appendices 2 and 3 have guided the following recommendations. These recommendations highlight gaps in areas of compliance; elimination of harassment and victimisation; professional development and disability awareness.

4.1 STANDARDS FOR COMPLIANCE

Since October 2002, all new public transport conveyances, premises and infrastructure must comply with the transport standards. Facilities already in operation at that time have between five and thirty years to comply with the standards (see Appendix 1).

4.1.1 Complaints Processes

The complaints process is a valuable mechanism to ensure that transport providers are complying with the Transport Standards. Feedback from PWdWA's consultation process revealed that some people are reluctant to come forward to make a complaint for fear of retaliation, and worry that they will be left without transport if they make a complaint. This was particularly a concern for people using multipurpose taxis in areas where there was only one driver, and where the complaint involved the driver.

Recommendation 1:

PWdWA recommends that the Transport Standards include improved protections to ensure that people with disabilities can submit a complaint without fear of retaliation.

Recommendation 2:

PWdWA recommends that the Transport Standards include improved procedures to ensure that people with disabilities are not left without adequate transport as a consequence of submitting a complaint.

Currently advocacy agencies and other representative organisations are not permitted to submit a complaint relating to the Transport Standards on behalf of an individual or group. Allowing advocacy agencies and other representative organisations this right would help ensure that transport providers are complying with the Transport Standards. This would be an effective mechanism to ensure that systemic cases of non-compliance are identified and exposed; and give people with disabilities, their families and carers peace of mind that their case can be reviewed without them being identified.

Recommendation 3:

PWdWA recommends that advocacy agencies and other representative organisations are permitted to submit a complaint under the DDA on behalf of an individual or group experiencing issues relating to the Transport Standards.

4.1.2 Exclusions

The transport standards apply to the full range of public transport vehicles, premises and infrastructure with the following exclusions:

- limousines, hire cars and charter boats
- dedicated school bus services
- small aircraft with fewer than thirty seats
- airports that do not accept regular public transport services.

From the feedback we have received it is clear that people with disabilities and their representatives are surprised that hired vehicles and dedicated school bus services are exempt from complying with the full set of Transport Standards.

Hired Vehicles

People with disabilities should have the right to hire an accessible vehicle, especially when other transport services may not be accessible to them. We understand that for some smaller hire companies it may be difficult to comply with the Transport Standards. Though, including this exclusion means that even the larger companies with capacity to comply, that operate across Australia, are also exempt.

Dedicated School Bus Services

A dedicated school bus service is defined in the Transport Standards as a service that operates to transport primary or secondary students to or from school or for other school purposes (Part 1.13). These services are excluded from 26 parts of the Transport Standards.

The exclusions effectively mean that dedicated school buses are excluded from all physical access requirements in the Transport Standards. That is, dedicated school buses are not required to:

- provide a boarding device for people using mobility aids;
- provide handrails or grabrails;

- provide any allocated spaces for people with mobility aids;
- include appropriate surfaces; or
- provide automatic or power-assisted doors, or have doorways of a specific width to assist people with mobility impairments.

The exclusion of dedicated school buses from physical access parts of the Transport Standards was a response to the identified costs of these particular Parts, which require investment in low-floor buses or retro-fitting of coaches.

Source: [RSI Analysis of Dedicated School Bus Exclusions Option](#)

The 2007 Review of the Transport Standards found that the exclusions to the physical access provisions of dedicated school buses limited the provision of services for students with disabilities. In response, the Government recognised the importance of providing students with disabilities every opportunity to participate in community life, including being able to travel alongside students without disabilities on dedicated school bus services. Though without adequate access to school transport services and the exclusion of dedicated school bus services from the Transport Standards, unfortunately, access issues continue to exist.

Appendix 2 includes a list of issues relating to school bus services; covering health and safety, lack of accessible buses in regional areas and lack of alternative transport options. There were also issues about pick-up times, where in order to collect all children in certain regions some children were being picked up 2 hours before they were dropped off at school. This was not a practical option for the students and their families, especially when one student only lived 10 minutes' drive from the school. A difficult situation for families when other public transport options were unavailable, such as accessible and affordable taxi services. Consequently, families have had to consider moving house or changing schools so that their child can have access to an adequate school education. Students should have a right to accessible school bus services which could also help reduce the demands on multipurpose taxi services.

Recommendation 4:

PWdWA recommends that the Department of Infrastructure and Transport consider removing the exclusions currently included in the Transport Standards and set out a reasonable schedule for compliance for existing services.

4.1.3 Exemptions

An exemption can allow a transport operator or provider to lawfully not comply with the usual requirements in the standards for a set period. Under the transport standards, a provider or operator can use unjustifiable hardship as a defence against a claim that they have discriminated against someone unlawfully.

In 2007, the Taxi Councils of Western Australia and Queensland submitted an application for exemption from the following part of the Transport Standards:

Part 1.2 of Schedule 1 of the Disability Standards for Accessible Public Transport provides that response times for wheelchair accessible taxis are to be the same as for non-wheelchair accessible taxis and places responsibility for this requirement on taxi radio networks and co-operatives. The application argues that radio networks and co-operatives do not have the ability to ensure compliance.

The exemption was sought for five years and submissions were received in 2008 from ministers, disability services, and advocates opposing the application. Interestingly, five years later this application is still current, with a notice on the Human Rights Commission's website stating that the "decision is deferred pending the applicants' response to the submissions".

PWdWA is disappointed that, as it appears, the Taxi Councils of Western Australia and Queensland achieved their desired outcome; not because their application for exemption was granted but by the fact that the application was never refused. We understand that the application process is dealt with by the Human Rights Commission, though the Department of Infrastructure and Transport should ensure that decisions are made within specified timeframes.

This incidence of non-compliance by the Taxi Council of Western Australia has significantly impacted people with disabilities. Unreasonable waiting times for multipurpose taxis is still one of the main issues we are made aware of in our role as systemic advocates. People have waited up to two hours for multipurpose taxis to arrive. Vulnerable individuals have been left waiting on their own late at night. People who use multipurpose taxis report that they are often late for work or school, important meetings, medical appointments and social events. They report that it's not just about being late when they are not to blame, but also about the embarrassment and financial costs incurred. Time is a precious commodity, and people with disabilities should be entitled to the same quality of taxi services as people without disabilities. People who use multipurpose taxis are often dependent on these services as alternative methods of transport are inaccessible or impractical.

Recommendation 5:

PWdWA recommends that the Department of Infrastructure and Transport along with the Human Rights Commission set clear timeframes by which a decision needs to be made regarding an application for exemption from compliance with the Transport Standards.

4.2 STANDARDS FOR ELIMINATING HARASSMENT & VICTIMISATION

The feedback we have received from people with disabilities, their families and carers reveals that transport issues go beyond physical access issues. Overall, people were happy with the assistance they were provided from public transport employees; however, there were also some incidents of public transport employees displaying abusive behaviour and using inappropriate language. People with disabilities reported that this caused them distress and anxiety and they felt targeted because of their disability. One individual reported that she had received abusive feedback when the perpetrator of the harassment discovered that she wished to make a complaint about his conduct.

The Disability Discrimination Act 1992 includes the following clauses: Section 39: "It is unlawful for a person who, whether for payment or not, provides goods or services, or makes facilities available, to harass another person who: (a) wants to acquire the goods or services or to make use of the facilities; and (b) has a disability. Section 42: "It is an offence for a person to commit an act of victimisation against another person."

In contrast to the Transport Standards, the Disability Standards for Education 2005 includes a section on harassment and victimisation, where harassment is defined "in relation to a person with a disability, to include an action taken in relation to the person's disability that is reasonably likely, in all the circumstances, to humiliate, offend, intimidate or distress the person."

Part 8 of the Education Standards include specific standards for the elimination of harassment and victimisation. We have modified these standards to relate to the Transport Standards and presented them in Recommendation 6.

Recommendation 6:

PWdWA recommends that the Transport Standards includes the following section to address elimination of harassment and victimisation.

Transport providers must:

1. have strategies and programs in place to prevent harassment and victimisation of people with disabilities.
2. take reasonable steps to ensure that all staff are informed about:
 - (a) the obligation not to harass or victimise people with disabilities; and
 - (b) the appropriate action to be taken if harassment or victimisation occurs; and
 - (c) complaint mechanisms available to a person with a disability who is harassed or victimised in relation to their disability.

4.3 STANDARDS FOR PROFESSIONAL DEVELOPMENT

The feedback PWdWA received from people with disabilities, their families and carers revealed that while transport employees were generally helpful, in some situations they appeared to lack training in disability awareness. The Transport Standards may have been written to protect the rights of people with disabilities but without adequate ongoing training of employees, and monitoring of compliance it is unclear whether the rights of people with disabilities are being safeguarded and upheld.

One main concern was that some transport employees did not know whether they should assist a person with a disability or whether assisting would be a breach of the provider's health and safety policy, or insurance policy. Generally, these employees are trying to do the right thing but the lack of appropriate training means that they are unsure what the correct procedures are. We found that this was particularly relevant for bus drivers. Importantly, Part 33.6.1 of the Transport Standards under 'Direct Assistance' states that

"Nothing in these Standards prevents operators or providers from offering assistance directly to passengers."

Recommendation 7:

PWdWA recommends that the Department of Infrastructure and Transport develops industry specific guidelines to assist public transport employees in understanding their obligations under the Transport Standards, and that public transport employees receive ongoing training in the areas of disability access, inclusion and reasonable adjustments.

Recommendation 8:

PWdWA recommends that the Department of Infrastructure and Transport improves mechanisms to ensure that transport providers regularly monitor compliance with the Transport Standards.

4.4 STANDARDS FOR RAISING AWARENESS

Feedback from PWdWA's consultation process revealed that it was not just public transport employees who would benefit from disability awareness training but also other passengers. One person with a hidden disability said that sometimes bus drivers and other passengers assumed she didn't need assistance to get onto the bus because she 'looked ok', despite the fact she had requested assistance.

Part 1.23 of the Transport Standards Guidelines states that:

Some passengers' disabilities are not visible. The Disability Standards assume that passengers of this kind will identify their disabilities to the operator or provider so that their needs can be accommodated. In particular, such passengers need to identify their needs when making bookings by telephone.

The Disability Standards also assume that operators or providers will arrange assistance for passengers who identify their needs.

Recommendation 9:

PWdWA recommends that the Department of Infrastructure and Transport implement strategies to improve disability awareness among public transport providers, employees and passengers; including implementing training programs on the needs of people with hidden or episodic disabilities.

Some people with disabilities have found they are not eligible for concessions because the symptoms of their disability are episodic. That means that they may be well enough to use buses or trains on certain days but not on other days.

Recommendation 10:

PWdWA recommends that the Department of Infrastructure and Transport review the programs providing concessions for people with disabilities to take into account the needs of people with episodic disabilities.

Other areas identified as requiring attention included:

- identifying the specific needs of people from regional, rural and remote communities, where public transport may be limited;
- exploring why some people with disabilities do not use public transport;
- accounting for advances in technology and how these may impact different people with disabilities;
- accounting for developing public spaces and access to other forms of public transport, such as access to the city cycle program which has been recognised as a new form of public transport in some regions.

Recommendation 11:

PWdWA recommends that the Department of Infrastructure and Transport collect data to identify the specific needs of people from regional, rural and remote communities in accessing public transport; and explore the reasons why some people with disabilities do not use public transport services.

Recommendation 12:

PWdWA recommends that the Transport Standards are flexible enough to account for advances in technology and the development of public spaces.

PWdWA's consultation process revealed that one main issue was that people with disabilities are unaware of their rights under the Transport Standards and how to submit a complaint.

Recommendation 13:

PWdWA recommends that the Department of Infrastructure and Transport ensures that the Transport Standards and other resources are available to people with disabilities in accessible and alternative formats, taking into account principles of universal design.

5. CONCLUSION

This submission has made recommendations under the following areas, based on the feedback we have received from people with disabilities, their families and carers:

- Standards for compliance
- Standards for eliminating harassment & victimisation
- Standards for professional development
- Standards for raising awareness

PWdWA looks forward to the report on the review of the Transport Standards, that we hope will be released within a reasonable timeframe.

Please contact us if you have any questions about the content of this submission or require further clarification of our recommendations.

APPENDIX 1

SCHEDULE 1: DISABILITY STANDARDS FOR ACCESSIBLE PUBLIC TRANSPORT

Part 1 Target date — 31 December 2007

1.1 Responsibility

- Operators
- Providers

Requirement

Full compliance with the relevant Standards in relation to:

- | | |
|---|---|
| <ul style="list-style-type: none"> • Waiting areas • Symbols • Signs • Alarms • Lighting • Furniture and fittings | <ul style="list-style-type: none"> • Hearing augmentation • Information • Booked services • Food and drink services • Belongings • Priority |
|---|---|

Application

Conveyances

Premises

Infrastructure

- except bus stops
-

1.2 Responsibility

- Radio networks
- Co-operatives

Requirement

Response times for accessible vehicles are to be the same as for other taxis.

Application

Conveyances

- Taxis
 - Dial-a-ride services
-

1.3 Responsibility

- Operators
- Providers

Requirement

Compliance with the relevant Standards by 25% of each type of service in relation to:

- Access paths
- Manoeuvring areas
- Passing areas
- Resting points
- Ramps
- Boarding
- Allocated space
- Doorways and doors
- Lifts
- Stairs
- Toilets
- Tactile ground surface indicators
- Controls
- Street furniture

Application**Conveyances****Premises****Infrastructure**

- except bus stops
-

1.4 Responsibility

- Providers

Requirement

Compliance with the relevant Standards by 25% of bus stops in relation to:

- Access paths
- Manoeuvring areas
- Passing areas
- Ramps
- Waiting areas
- Boarding
- Allocated space
- Surfaces
- Handrails and grabrails
- Stairs
- Symbols
- Signs
- Tactile ground surface indicators
- Lighting
- Street furniture
- Information

Application**Infrastructure**

- Bus stops
-

Part 2 Target date — 31 December 2012**2.1 Responsibility**

- Operators
- Providers

Requirement

Full compliance with the relevant Standards in relation to:

- Surfaces
- Gateways
- Handrails and grabrails
- Vending machines

Application

Conveyances

Premises

Infrastructure

- except bus stops
-

2.2

Responsibility

- Operators

Requirement

Full compliance with the relevant Standards in relation to:

- 1500 mm minimum head room and vertical door opening

Application

Conveyances

- Accessible taxis
-

2.3

Responsibility

- Operators
- Providers

Requirement

Compliance with the relevant Standards by 55% of each type of service in relation to:

- Access paths
- Doorways and doors
- Manoeuvring areas
- Lifts
- Passing areas
- Stairs
- Resting points
- Toilets
- Ramps
- Tactile ground surface indicators
- Boarding
- Controls
- Allocated space
- Street furniture

Application

Conveyances

Premises

Infrastructure

- except bus stops
-

2.4 Responsibility

- Providers

Requirement

Compliance with the relevant Standards by 55% of bus stops in relation to:

- | | |
|---------------------|-------------------------------------|
| • Access paths | • Handrails and grabrails |
| • Manoeuvring areas | • Stairs |
| • Passing areas | • Symbols |
| • Ramps | • Signs |
| • Waiting areas | • Tactile ground surface indicators |
| • Boarding | • Lighting |
| • Allocated space | • Street furniture |
| • Surfaces | • Information |

Application

Infrastructure

- Bus stops
-

Part 3 Target date — 31 December 2017

3.1 Responsibility

- Operators
- Providers

Requirement

Compliance with the relevant Standards by 90% of each type of service in relation to:

- | | |
|---------------------|-------------------------------------|
| • Access paths | • Doorways and doors |
| • Manoeuvring areas | • Lifts |
| • Passing areas | • Stairs |
| • Resting points | • Toilets |
| • Ramps | • Tactile ground surface indicators |
| • Boarding | • Controls |
| • Allocated space | • Street furniture |

Application

Conveyances

except buses

Premises

Infrastructure

- except bus stops
-

3.2 Responsibility

- Operators
- Providers

Requirement

Compliance with the relevant Standards by 80% of each type of service in relation to:

- Access paths
- Manoeuvring areas
- Passing areas
- Resting points
- Ramps
- Boarding
- Allocated space
- Doorways and doors
- Lifts
- Stairs
- Toilets
- Tactile ground surface indicators
- Controls
- Street furniture

Application

Conveyances

- Buses
-

3.3 Responsibility

- Providers

Requirement

Compliance with the relevant Standards by 90% of bus stops in relation to:

- Access paths
- Manoeuvring areas
- Passing areas
- Ramps
- Waiting areas
- Boarding
- Allocated space
- Surfaces
- Handrails and grabrails
- Stairs
- Symbols
- Signs
- Tactile ground surface indicators
- Lighting
- Street furniture
- Information

Application

Infrastructure

- Bus stops
-

Part 4 Target date — 31 December 2022

4.1 Responsibility

- Operators
- Providers

Requirement

All public transport services are to fully comply with the relevant Standards.

Application

Conveyances	Premises	Infrastructure
except trains and trams		

Part 5 Target date — 31 December 2032

5.1 Responsibility

- Operators
- Providers

Requirement

All public transport services are to fully comply with the relevant Standards.

Application

Conveyances
• Trains
• Trams

APPENDIX 2

PWDWA'S PUBLIC TRANSPORT SURVEY RESPONSES

LIST OF TRANSPORT ISSUES

Feedback received from 28 people with disability and 11 family members / carers.

BUS AND COACH SERVICES

1. Never used.
2. My intellectually disabled daughter was put off the bus to her work, when she had forgotten her bus pass and had no money! She stood abandoned at the bus stop. Only happened once! But she was frightened in what to do? She puts her hand out to stop the bus - and it zooms past her! This is happening too often!
3. The train driver closes the door on people and the person from Transperth who is standing outside to control heavy crowd they were laughing and the bus driver fails to stop the bus when you give hand to them.
4. The driver often doesn't give me time to get to my seat. The seats allocated for people with disabilities, the elderly, and people with push chairs are not ideal for some people. I have a vestibular condition and find I have little stability when using these seats. The seat behind the driver also has a big step. The most suitable seat is at the back of the bus but the driver drives off before I have a chance to get to the back of the bus. I understand that bus drivers are under a lot of pressure to be on time but time must be allowed for people to get safely to their seats. I have witnessed people falling trying to get on and off buses and have often stumbled trying to get on the bus. A smoother ride would also be appreciated but often the bus is the problem and not the driver. The old buses have very high steps but I'm aware that these old buses are slowly being replaced.
5. I could not fit my gopher on a designated disability bus - corner of access way too tight. I just needed someone to move the back of gopher over 40 cms but driver wouldn't assist - said it was not her job!
6. Entered a bus with my guide dog and was told I was not allowed to bring my dog onto the bus, I refused to get off the bus, and the bus driver took me to my destination (Curtin University to Canning Bridge station). This upset me terribly however and was not a nice experience. The driver was not very nice. I put in a complaint to Transperth, this was last year.
7. Because I have leg muscle problems which makes it difficult for me to stand and I am unsteady on my feet I try not to use Public Transport. I have trouble getting to the seat. I can only stand for short periods and because I look well apart from the walking stick they tend not to get up for me. Once I am in the seat I have difficulty getting up. I need hand bars on each side of the seat so I can push myself up. I don't blame the transport or the people. It is just too difficult for me.
8. Wheelchair can slide out from the specific bays especially when wet and on tight corners, drivers generally unhelpful.
9. Can't get on the vehicle.

10. Bus ramp too steep.
11. I use a mobility scooter and there is not enough space to turn it around to get back out again. The lurching of the bus when the drivers brake hurts my neck even if I do manage to get on. I have tried to get dropped at a bus stop and use my walking stick but the neck thing is a problem and you always have to ask them to lower the bus or put out the ramp. They should train them to do it automatically - especially if someone is standing there with a walking stick. The first step is higher than on a non-accessible bus if the bus is not lowered and I see elderly people who don't want to be a bother or are too timid or proud to ask for the bus to be lowered, really struggling to get up the steps. I no longer even try to catch a bus - even though there are plenty at the end of my street. I am trying to transfer to live near the train.
12. I don't know where to catch a bus unless I walk to the train station, which is hard.
13. Sometimes the drivers refuse to lower the bus enough for me to be able to lift myself onto the bus.
14. I have had myself and my wheelchair fall over because a bus driver took a corner too quickly. Some bus stops make getting on and off a bus a little tricky.
15. Ramps not working on Transperth buses.
16. Busy and chaotic at times which becomes very confusing. Also transfers between platforms or from bus to rail station can be long and arduous, especially in peak hours.
17. Overcrowded trains, lack of seat on trains, lack of respect from fellow travellers who do not offer up a seat or who sit in the Priority Seating allocated for people with disabilities when they do not in fact have any disabilities. Also difficult to access the older Transperth buses which have a narrow entrance and stairs.
18. N / A.
19. Tour buses for tours anywhere are not suitable for people confined to wheelchairs.
20. Buses some are okay, though it is difficult when the driver won't/can't assist. Coaches I assume I can't do independently as I don't walk at all and crawling at age 40, almost is really not on.
21. Blind person difficulty locating appropriate bus might find stop but which bus.
22. There aren't any.
23. Accessible buses often have ramps that are not working & many still aren't accessible (I'm not in a wheelchair but use a walker & cannot easily climb steps). It is impossible to safely use trains during peak hour as I get knocked over by the hordes of passengers getting on, & don't always get a seat (very obviously disabled as I am). I have tried sitting on the seat of the walker while holding on to a rail, but it gets in people's way as it 'wanders' (moves) even if the brake is on. I have tried using several walkers but the same thing occurs. Once, when I was just using a cane & not a walker, I had to sit on the floor as I couldn't find a seat & cannot safely stand without falling. I cannot easily get up & had to crawl off the train until someone assisted me up.
24. Difficulty getting wheelchair into trains due to the substantial gap in height between station and train; not all buses are accessible.
25. First step on bus is often too high to reach.

TRAM SERVICES

1. No tram services in WA.
2. In Nov 2012 my wife & I went on holidays to Melb. She has mobility problems - but managed to board the trams to get back to the city - we failed to board the tram because the steps were much higher. Despite heroic efforts we had to grab a taxi. The trams are NOT disability friendly! I wrote to the Mayor and after 6 months, there is no reply!! Travel agents should warn the disabled, their transport is not up to standard for those with mobility problems.
3. N / A.
4. Can't get on a tram in Melbourne. We don't have trams in Perth.
5. Not accessible.
6. Some tram platforms in Melbourne have too wider gap between platform and tram.
7. None in Perth.
8. There aren't any.
9. There are no trams in WA.
10. Not attempted.
11. Older Trams the step up is too high.

TRAIN SERVICES

1. Lengthy ramps are difficult to access! Perth lines stairs impossible! Elevators / lifts not in correct positions for access at some stations. Victoria Park station - terrible!
2. Sort of a yes to experience but there is bit difficult because I cannot hear the speaker let us all to know what happen or next stop. There do have a caption top the board but sometimes don't do provide with it. Just that worry me how the usher syndrome people have a tunnel to hard view the area where we are stop at and block people to stand to try move by accident hit by someone shoulder in rash. Sometimes train run quickly stop to leave as all what I believe to let train stop for 5 mins to move because people with the tunnel eyes cannot see very clear where we were at?
3. Finding a seat.
4. Lifts not working.
5. I find some platform lifts a very fit with a gopher with a bag on back - eg Warwick station. Train doors do not stay open long enough to enter or exit carriage, especially when train is rather crowded. Try to travel off peak but sometimes it is unavoidable.
6. Once again it is just too difficult. I have to cross a busy road from the bus stop to the station. I am just too slow moving to get on a train. I avoid them.
7. Sometimes stations are not level with trains making entry and exit difficult.
8. Gap excessive or variation on heights between platform train.
9. Perth is pretty good now. Sherwood station used to be scary if you didn't have a ramp - not sure how it is today. Having to organise a ramp an hour ahead is ridiculous. If there is a gap I

just tell people to get out of the way and I go a bit faster so I make the gap. In Sydney I always stay right in the city because I had the experience of getting to a train station (I think it was Redfern) and there were no lifts or ramps! Only stairs. I was late for a conference because of it. You can have ramps organised at main Sydney train station OK but last time I was there there was still no disability space I don't think because they always park you at the bottom of some stairs and you are in everyone's way and have to keep moving back and forth to let people up and down the stairs. Not a great system. The workers are really friendly and try to be helpful though.

10. Crowds are so large getting on & off the train I am terrified. I have been known to wait for several trains before I can get on one. Not because it is any less crowded but I need to get home sometime.
11. East Perth Station has the biggest gap I have seen between a train and the platform. I didn't even attempt it, I rolled to the next station to catch the train. Some of the stations on the Fremantle line have too large a gaps as well, I have been caught between the gap at Claremont Showgrounds. Edgewater station also has had bad gaps, depending on the train that is used.
12. Fear for safety at night.
13. Lifts broke down, front wheels get stuck between train and platform.
14. Walking from bus station to rail station is long and hard work (due to cerebral palsy).
15. Lack of space on the train, lack of seats, lack of respect from fellow travellers to people with disabilities (don't offer up seats and sit in priority seating allocated to people with disabilities when they do not have a disability). Also lack of access lifts available at train stations.
16. You cannot access some platform when lifts are out of order.
17. The gap or step between train and station.
18. Fell from station some years ago.
19. Some stations in Perth do not have access to ramps.
20. Gap between station and train is high; difficult to access in wheelchair; sometimes other patrons rush and it is difficult to get on or off the train e.g. royal show, to the horror of other patrons!
21. I am blind and the trains are reasonably good when there is an attendant to assist in Perth. Difficulty in Karrakatta and other unattended platforms - difficulty getting off the platform - there needs to be better markings on the platform on how to get to the exit and the end of the platform.

TAXI SERVICES

1. One night at Royal Perth Hospital I required a Maxi Cab . I was driven in to RPH by a neighbour and forgot to take my Taxi User Subsidy Scheme Booklet. The Maxi Cab driver refused to take me unless I paid the full fare before allowing me on board. I refused this demand and then got a normal taxi where the driver was most helpful and waited at home for me to get my vouchers. I paid him an extra \$5 for his service.
2. Once I got him ready. Hearing the taxi. I was coming out. By the time I got out of the front door he drove off. Waiting for taxis is sometimes too long.

3. Two or three times taxis have not arrived.
4. Taxi service are great but the \$\$\$ is kind rip it off. People with usher syndrome need have a taxi fees to get cheap travel then catch the buses or a train whenever there is rain or a urgent or no buses area at home. Spend on taxi cost for usher syndrome people who don't have a job while they are on pension, I believe all the usher syndrome or blind should get TUSS a cheap fees for taxi.
5. Terrible, I have to begin work at 8am mon-fri and have a standard booking for as early as 5am and still don't get to work on time and then it's MY pay that gets docked even though being late was NOT my fault. I have plenty more stories but u don't have enough time! not happy at all.....
6. Long waiting times for some journeys.
7. Recently the company refused to take a booking for a wheelchair taxi at weekend, despite giving a week's notice.
8. Refused a taxi service as I was accompanied by my guide dog.
9. I have difficulty getting in and out of the taxi due to my condition. I either need a wheel chair taxi or a high seat to get in and out.
10. Generally hard to get taxis as usually late or don't arrive.
11. Booking a wheelchair accessible taxi it's ridiculous. It's way too long.
12. Huge waiting times +2hrs and driver choosing easier fare over disability.
13. At night it can be impossible to get a multi-purpose taxi pick you up in Perth. They will bypass you to pick up a group of people. I can't get a Multi to Freo or if I do I can't get home as it is a short trip. I would have to get a train to Perth and then get a taxi home from there. When I used to use taxis I would wait hours. I kind of gave up on them but have used them more recently and things may be slightly improved. My son loaned me the money to buy a van - but I can't always drive so I got used to staying home more.
14. Phoning you should be able to text for a taxi.
15. Taxi take up to four hours to arrive, lift broken, driver not know how to restrain chair properly.
16. Very expensive, booked taxis are often late and frequently overcharged (due to concurrent intellectual disability).
17. Yes in Brisbane the maxi taxis do not have an extra side step.
18. Some taxi drivers object to 'dealing with' those in wheelchairs. Also although they are meant to have training in folding manual wheelchairs, very few know how and will not ask. Hence damage occurs.
19. Non arrival of taxis.
20. Curbs are too high and lack of ramps.
21. Long delays in taxi attending creates major difficulties in planning lifestyle and attending events/appts/friendships in the community; on rare occasions a dishonest driver who abused taxi voucher subsidy scheme, once only driver leaving profoundly disabled non-verbal child in chair outside respite facility one evening after ringing the bell and leaving.

22. Difficulty in getting a taxi from Fremantle when there is a tourist vessel in Fremantle as the taxis are used by the tourists. Some difficulties in finding the taxi rank at Fremantle as I am blind but usually ask people for assistance.

AIR FLIGHT SERVICES

1. We have found air flight services to be excellent with helpful staff for special seating, help with baggage and free wheelchair with attendant etc.
2. Flying is impossible. Can't get out of the seats. Can't get up any steps. Because of the pacemaker and knee replacement the security measures mean taking shoes off and standing for a search. I avoid airports.
3. Extremely difficult to get on and off having to use plane seats can be uncomfortable. Certain air routes have planes which can't fit certain sized wheelchairs preventing travel to these destinations.
4. I get on and off by being pushed in a wheelchair and then they leave me waiting for my scooter - but when it comes it has all the terminals taped up and is unusable. The baggage guys say they are too busy to help so since I usually travel alone and I can't fix it myself, I have to ask a passer-by to help. You have to take the seat off (which is very heavy) and get down and take off the tape and reconnect everything. I am due to travel in August and have mentioned this problem so will see how it goes. I have had to speak up at Sydney airport to insist that I get a multi-purpose over able bodied people. I am quite assertive - I don't know how someone shy would cope.
5. Perth International Airport is a nightmare for anyone with a disability.
6. Baggage and security Baggage in that difficulty manoeuvring lifting security in that lack of understanding.
7. Narrow aisles in planes.
8. The support and assistance from airlines has always been fantastic. No complaints there.
9. Yes Perth airport do not provide assistance from the kerb into the airport check-in counter.
10. Not really, I don't the fact that the airport wheelchairs have 4 small wheels so you cannot push yourself and my body does not like long plain flights in cramped seats but nothing that is really an access issue.
11. Airports themselves are ok but I hate those silly little chairs they put you in with too little aisles....sometimes the arm rest do not lift to transfer into the plane's seat which are too small and if I need to go to the toilet, I'm in trouble!!!!!!!!!!!!!!!!!!!!!!
12. Very very difficult to travel in planes...cannot use own wheelchair, the plane ones for transport to seat do not provide adequate support let alone comfort; unsuitable restraint options in seat...unlikely to travel in a plane again as an adult...lack of understanding of air stewards, although ground staff exceptionally helpful.
13. When you arrive at a destination (Perth) there a times are no walk off ramps - necessary to descend flight of stairs whilst carrying hand luggage - you are not advised of this will occur when you book even if you ask.

FERRY SERVICES

1. Only a limited opportunity to go on ferry.
2. Depending on tides, it can be very tight entering and exiting ferry at South Perth.
3. Generally very hard to access them.
4. Failure of platform height adjustment mechanism.
5. It just seemed to hard so I just never went on a ferry.
6. It appears to be too risky, like trains, to cross the gap.
7. Used Perth ferry from south Perth without any problems: good ramp, space on board: terrific!
Similarly Rotto ferry.

OTHER COMMENTS

1. Transport service in WA is pretty good.
2. Overall, things have improved with transport. However, the trams in Melbourne need to lift their service and the Mayor needs to be 'forcefully' admonished for ignoring transport needs for people with mobility problems.
3. I use my car to take my daughter to wherever she needs to go. Alternatively, we have carers who use their own cars to take her to bowls, to the gym, to wherever they take her. The service provider sometimes takes her by train. So far we have had no problems.
4. Nope nothing to say because I just lost my driver's license as well I all have a lift with my partner, friends, taxi, buses. Just hate having catch the buses due rain and times.
5. Seating.
6. I wish I could afford my own car then I wouldn't have to deal with this stress every day.
7. There are a lot of people with hidden disabilities and just because a person looks ok doesn't mean the they are ok. Some disabilities are also episodic so just because a person can catch a bus one day doesn't mean they will be well enough to catch the bus the next day and may require a taxi. Raising awareness about hidden and episodic disabilities among public transport staff, passengers and departments issuing concessions and subsidy books may help, with appropriate policies put in place.
8. I travel alone on a gopher (amputee) and generally find all manual toilet doors too heavy to open, especially if access is poor and I have to use crutches only. Some floors very wet and slippery.
9. I have coeliac disease and have difficulty obtaining gluten free food on some transport.
10. Bus drivers go too fast round corners.
11. Taxi availability remains an issue! All MPT taxi should be available for private bookings 24/7.
12. There doesn't seem to be any holiday coaches or trains that go to regional areas that are accessible. I could be wrong - things may have changed, but you give up on things, so I haven't tried for a while. I had a scary incident with a multipurpose taxi driver - he was frickin nuts and started yelling at me. I complained to the taxi company about him and he is not a taxi driver anymore. Most of the drivers though - the ones that actually pick you up anyhow, and they

seem to be the same drivers all the time, are generally nice people. I have heard the other drivers refer to Multi-Purpose cabs as 'veggie vans' which is disgusting. One guy - even though he was complaining about not being able to get enough fares in a standard taxi - told me that pwd piss themselves all the time. He said he had done the training and that is what he learned from it and so he said he doesn't want to clean up piss all the time so he sticks with standard cabs.

13. Crowded train stations seem dangerous, from an OH&S view, & the trains are so crowded you can't always get off because people don't let you thru. Same has happened on the bus I was halfway out the bus and it started to drive off, I took a bit longer getting to the door, lucky the other passengers told the driver to stop. It can be very harrowing going anywhere in Perth on public transport. I think that's why some people stay home all the time. Can't act belong and commit if you can't get there.....
14. No other issues.
15. I am surprised that there are no tie downs in the bus these days. My daughter just returned from the US and she said all wheelchair users have to be tied down (the bus driver does this). I can't understand why there is not even a universal clip for us to use. Every time I go around a corner in a bus I have to hang on for grim death sometimes.
16. Mainly I take my own car its easier especially if you're going from place to place picking up and dropping off either people or items.
17. Plane: would like to be able to remain in my own wheelchair on the plane. Bring back that carer fly free. Let more than 2 PWD fly in the 1 plane. TRAINS: Would like more automatic lifts and ramps at train platforms. I can't press the buttons. TAXI: More accessible taxis and drivers quota for pwd to be more than 60 per month, plus penalties given is passengers have to wait more than 15 minutes. Buses:- more accessible, portable ramp behind driver in case ramp not working, restraint system in buses. More PWD train drivers. FERRIES: Haven't travelled to Rottneest for many years so don't know. Ferry to South Perth, great. TRAM: None accessible.
18. The stage has been reached where my brother can only travel by private car or taxi because of his physical and intellectual disabilities. Catching taxis to work three times a week, even with government subsidised taxi vouchers, costs him far more than he earns!
19. Many of the Transperth services are not easily accessible for someone like me who is legally blind due to the ignorance and lack of respect from fellow travellers.
20. The buses are not always low floor or wheelchair accessible and some stops need to be brought up to standard for wheelchair users and we should not have to ring a depot to find out whether or not there is an accessible bus on the route we want to travel. Seeing we were told many years ago that all buses would be accessible in 2010 in Perth. What happened.
21. For me the biggest issues are taxi drivers who will not take people in wheelchairs and those who do not know or even asking how to fold them correctly and if they do language is such a barrier (most taxi drivers, in Perth at least, are knew immigrants with almost no English) it makes it very hard to explain what I mean.
22. Taxis can be troublesome drivers taking circuitous routes?
23. Just inadequate!!!!!!!!!!!!

24. I have MS although it is not visible. When I ask for a seat in the priority seating area I am refused. I would like to see Transport Authorities supply a card issued by them which a person could show the seated person that you have some priority.
25. Bus services at the weekend are poor. Getting on the bus is difficult as the driver doesn't always wait till you are seated. More handrails needed on the buses for people with visual impairments. Rang Transperth to ask for a timetable. Asked what time the bus passed and the service on the phone was very good, but asked twice for the timetable to be sent and still haven't received it.

APPENDIX 3

TRANSPORT ISSUES – DATABASE REVIEW AND CONSULTATIONS

BUSES

- Mechanical failure of bus ramps.
- Gas bus explosions and fires.
- Steps that are too high.
- The driver having to close the doors to put down the ramp - health and safety issue in case of a fire if the back door can't open.
- Buses driving too quickly round corners.
- Bus drivers using inappropriate language.
- Harassment from other passengers on the bus.
- Harassment from some school children.
- New Volvo bus ramps are too steep for a person who uses a wheelchair.
- New bus ramps are smaller, smaller area for parking wheelchairs.
- Lift breaks down, can't use hoist, should be a portable ramp available in an emergency.
- Inappropriate actions by bus drivers to try to resolve access issues.
- Lack of suitable routes on buses advertising access.
- OSH requirements preventing bus drivers to assist in securing wheelchairs.
- Unwarranted physical abuse from a bus driver.
- Bus driver preventing a person from boarding a Path Transit bus with a mobility scooter.
- Buses failing to stop for a person with a mobility aid waiting at a designated bus stop.
- Drivers not putting down ramps saying to the person that they look fit enough.
- Ramps not working. Driver being rude when a person asked for help. Told they had to wait till the next accessible bus arrived.
- Drivers refusing to assist with bus restraint systems / seat belts. Possibly due to their health and safety policy or insurance policy.
- Buses going past a person waiting at a bus stop in a wheelchair.
- Drivers saying the ramp isn't working - buses shouldn't be on the road if the ramp isn't working.

SCHOOL TRANSPORT

- Arranging convenient school bus pick-up times.
- Difficulties in accessing appropriate transport funding.
- Access to school buses in regional areas is a problem.

- Limited options when school buses are full and public transport is not suitable.
- Limited funds, school transport arrangements not financially sustainable.
- School bus service that would not provide appropriate seat belts.
- Families forced to consider changing schools because of transport issues.

TAXIS

- High cost of taxi services for people not eligible for mobility allowances / subsidies.
- Taxi drivers charging more than they should.
- Substantial overcharge and misuse of a cab charge voucher by a taxi driver.
- Limited availability of female drivers.
- Concerns about the safety of using vouchers instead of swipe cards, especially for people who have vision impairment.
- Long waiting times for non-standard taxis such as station wagons.

MULTIPURPOSE TAXIS

- Inequalities in rights to reasonable taxi services for users of multipurpose taxis.
- Insufficient numbers of multipurpose taxis available.
- Minimal requirements for multipurpose taxi plate holders to undertake journeys for people with access needs.
- Long waiting times for taxis for travel to appointments / school etc.
- Waiting times of up to two hours for a pre-booked taxi.
- Taxis not being available if not pre-booked.
- Embarrassment and unnecessary costs caused by missed appointments.
- Vulnerability of people waiting long periods on their own for a taxi.
- Waiting times resulting in anxiety and confusion experienced by a passenger who uses routine and structure.
- Taxi drivers holding on to passengers' subsidy books to fill in later.
- Full fares charged for each person when two passengers travel in a taxi.
- Taxi operating without the meter on.
- Inappropriate language used by a taxi driver.
- Old taxi bus used by a driver at busy times - possibly unregistered.
- Wheelchair that wouldn't fit in a taxi meant to be accessible.
- Risks to health and safety - belts not being used appropriately.
- Limited choice of taxi drivers in regional areas.

- Limited opportunities to travel at regular times if the taxi is pre-scheduled for another person (e.g., for travel to school or work).
- Request for universally accessible taxis that can fit mobility aids such as fixed frames, like the London Taxi Cabs.
- Parent told her daughter would have to stay home from school one day because the taxi was unavailable.
- Worry that submitting a complaint will be more of a disadvantage than benefit.
- Incident of a complaint that resulted in the person with disability having no access to a multipurpose taxi while the case was being considered.
- Drivers having a monopoly on the service makes it difficult to make a complaint.
- Taxi driver putting the clock on before arriving to collect the passenger.
- Instructions in subsidy books not complied with by the driver. Some passengers are not aware of their own rights and responsibilities.
- Subsidy books not filled in correctly or not filled in at all.
- New subsidy books not arriving in time when pre-ordered.
- Fear of being blacklisted by drivers if a complaint is made about the taxi service.
- Taxi driver not respecting the intellectual capacity of a person because they were in a wheelchair.

TRAINS

- Can't use train lifts in a fire.
- Need assistance to use lifts. Subiaco station has an automatic lift door.
- Some stations have paths that are too steep to access with a wheelchair.
- Lack of accessible toilets on all platforms.
- Information about station upgrades may be difficult to understand when some people cannot read.

AIR TRAVEL

- Assistance for unaccompanied adults with intellectual disabilities - inconsistencies between airlines
- Concessions for people with disabilities and carers - inconsistencies between airlines.
- Wheelchair policies - inconsistencies between airlines.
- Limited assistance when disembarking a plane.
- Limited access for power wheelchairs on planes - unsuitable wheelchairs offered.
- Unreasonable restrictions due to the number of wheelchairs an airline is permitted to carry.
- Two wheelchair policy is a big issue.

- Harness can help.
- Person who uses a wheelchair was told by Qantas she could not travel independently. Always have to be transferred to another wheelchair. Told that there would be no-one to assist with lunch. Staff did assist in the end.
- Time to board a plane is not sufficient when having to transfer to an unfamiliar chair or seat.

OTHER ISSUES & COMMENTS

- Mobility allowance based on a fixed rate that does not take into account individual needs in covering transport costs to work.
- Tag on and tag off systems can be problematic.
- Lack of initiatives to support for independent travel.
- People with certain disabilities (e.g., episodic) unable to receive concessions.
- Inappropriate treatment of individuals by public transport employees.
- Unreasonable waiting times for complaints to be processed by the Department of Transport.
- Access sought for information about assistance with transport to medical appointments, concessions and subsidies, ACROD parking and complaints processes.
- Raising awareness of different disabilities among public transport staff and other passengers - particular hidden disabilities and disabilities that may cause the person to exhibit behaviours that some may confuse with being drunk or aggressive.
- Training in the diversity of mobility aids and assistive equipment required.
- Long waiting times for feedback after submitting a complaint.
- Difficulties accessing ACROD bays.
- Lack of support for drivers after being involved in incidents.
- Lifts breaking down at stations - lack of warning to passengers to make alternative arrangements - waiting times for lifts to be repaired.
- Access and safety issues and disruptions due to upgrades to stations.
- Difficulty finding accessible tour companies.
- Accessible toilets are sometimes locked.
- A table or bench in toilets would be helpful.
- Ferry to the zoo has a good lift ramp.