



Making Public Transport More Accessible for People Who Face Mobility Challenges



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Auditor-General

Making Public Transport More Accessible for People Who Face Mobility Challenges

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Victorian Auditor-General's Office

Auditing in the Public Interest

The Hon. Robert Smith MLC
President
Legislative Council
Parliament House
Melbourne

The Hon. Jenny Lindell MP
Speaker
Legislative Assembly
Parliament House
Melbourne

Dear Presiding Officers

Under the provisions of section 16AB of the *Audit Act 1994*, I transmit my report on *Making Public Transport More Accessible for People Who Face Mobility Challenges*.

Yours faithfully



D D R PEARSON
Auditor-General

9 December 2009

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Audit summary

Background

In 1992 the Commonwealth passed the *Disability Discrimination Act 1992* (the Act) requiring states to upgrade their public transport systems to eliminate discrimination.

The Act defined a disability as the total or partial loss of a person's bodily or mental functions or having a disease, illness or condition that affects a person's ability to learn or affects their mental or physical state. This includes the effects of ageing. It defined discrimination as treating a person with a disability less favourably than others.

The Commonwealth's Disability Standards for Accessible Public Transport (the disability standards) require states to progressively upgrade public transport to fully comply with the standards by 2032 and meet intermediate milestones in 2007, 2012, 2017 and 2022. The standards set minimum design requirements for public transport vehicles, stations, stops, interchanges and customer information.

About 20 per cent of Victorians have some type of disability and about one third of these people, or 6 per cent, report that this affects their access to public transport. Other people, for example, parents with young children, also need public transport that is easy to use. The demand for accessible public transport will rise as the population ages: one in four people will be over the age of 60 by 2021, compared with one in six in 2001.

In September 2006 the government published *Accessible Public Transport in Victoria—Action Plan 2006–2012* (the Action Plan). According to the business case underpinning the Action Plan, its objectives were to apply the disability standards and to enable people with a disability to use public transport safely, effectively and with dignity.

The Department of Transport (the department) is the main agency responsible for carrying out the Action Plan. The department set up the Public Transport Access Committee (PTAC), which included representatives from peak disability organisations, as a forum to advise the Minister for Public Transport.

This audit examined whether the department has been effective in making existing public transport services more accessible for people with a disability.

Conclusions

The department has succeeded in complying with the disability standards for most parts of the public transport system but it has not adequately measured how these changes have affected people with a disability. The department needs to now focus on these outcomes and the realisation of the Action Plan benefits.

Compliance with the disability standards

The department has been largely successful in meeting or exceeding the compliance targets set out in the disability standards.

The critical shortfall relates to standards covering trams and tram stops that help people with a disability to board and alight from trams, because:

- government policy is to replace older trams when they have reached the end of their design lives. However, this is not quick enough to achieve the milestones
- it has proved both difficult and expensive to upgrade the required number of tram stops and this is now conflicting with other uses of the road space.

The 2012 targets for these standards are unlikely to be met; however, the department is developing a plan to achieve full compliance by 2032. This plan needs to be finalised and the department is working to achieve this by the end of 2009.

Overall, the management of the Action Plan and reporting on compliance targets were adequate although there is room for the department to improve by:

- strengthening its processes for monitoring bus stop upgrades
- validating the accuracy of its compliance reporting for regional stations
- improving its management of the disability access components of projects.

Accessibility outcomes

The department has not adequately measured the outcomes from applying the disability standards for people with a disability. It needs to do this now.

The department needs to improve its understanding of how people with a disability use and want to use public transport, their level of satisfaction with the changes made to the system and their priorities for future change. The department should:

- commission an evaluation so that it can better manage PTAC
- complete research to better understand the travel behaviour of people with a disability.

The Action Plan and the detailed plans used to deliver its components included reasonable prioritisation principles but lacked detail on how these had been applied to determine priorities. Future plans should explain how priorities have been determined.

While the department understands how well it has complied with the disability standards, it has not measured its performance against the objective of enabling people with a disability to use public transport safely, effectively and with dignity.

The department now needs to apply the performance measures described in the Action Plan business case to understand the outcomes and respond to this information.

Recommendations

Number	Recommendation	Page
	The Department of Transport should:	
1.	Strengthen its processes for monitoring the multiple agents responsible for bus stop upgrades, which will include creating a bus stop asset database.	12
2.	Address the compliance accuracy issues regarding the department's reporting on regional station upgrades, metropolitan bus stops and audible train announcements.	12
3.	Improve its management, review and oversight so that the disability components of projects are adequately incorporated into project designs and delivered as intended.	12
4.	Commission an evaluation of the effectiveness of the Public Transport Access Committee and as part of this address the issues raised in this audit.	22
5.	Undertake research to better understand the travel behaviour of people with a disability.	22
6.	Require disability access plans to include information showing how prioritisation principles have been applied to select and order works.	22
7.	Develop and apply an evaluation framework to understand how well disability access works have achieved their intended outcomes of increasing the travel and level of satisfaction of people with a disability.	22

Audit Act 1994 section 16— submissions and comments

Introduction

In accordance with section 16(3) of the *Audit Act 1994* a copy of this report, or relevant extracts from the report, was provided to the Department of Transport with a request for comments or submissions.

The comments and submissions provided are not subject to audit nor the evidentiary standards required to reach an audit conclusion. Responsibility for the accuracy, fairness and balance of those comments rests solely with the agency head.

Submissions and comments received

RESPONSE provided by the Secretary, Department of Transport

I acknowledge receipt of your letter of 13 November 2009 enclosing the proposed draft report on the audit of Making Public Transport More Accessible for People Who Face Mobility Challenges and accept all the recommendations.

The Department's obligation under the Disability Discrimination Act 1992 and the associated disability standards for accessible public transport is to progressively remove barriers to allow for people with a disability to use public transport at will.

However, removing barriers and improving accessibility does not necessarily mean people with a disability will choose to use public transport.

1 Background

1.1 Introduction

The Department of Transport (the department) estimates that about 20 per cent of Victorians have some type of disability and about one third of these people, or 6 per cent of the population, report that this affects their access to public transport. Other people, for example parents with young children, also need public transport that is easy to use. The demand for accessible public transport will rise as the population ages—one in four people will be over the age of 60 by 2021, compared with one in six in 2001.

The government recognises that people with a disability should have equal access to opportunities and it has committed to remove transport barriers both for people with a disability and other people with mobility limitations.

The government's response in this area includes:

- subsidising taxis for Victorians with a severe and permanent disability that means they cannot use trains, trams or buses independently
- funding programs to modify the train, tram and bus systems to make them more accessible for people with a disability who can use these forms of transport unaccompanied.

1.2 Legislation and standards

1.2.1 Commonwealth legislation

The Commonwealth *Disability Discrimination Act 1992* (the Act) requires the government and service providers to improve public transport so it can be accessed by people with a disability. The Act makes it unlawful to discriminate against those with a disability and requires the government to upgrade public transport to minimum standards by target dates.

The Act defines a *disability* as the total or partial loss of a person's bodily or mental functions or having a disease, illness or condition that affects a person's ability to learn or affects their mental or physical state. This includes the effects of ageing.

It defines *discrimination* as treating a person with a disability less favourably than others.

1.2.2 Disability standards

In 2002 the Commonwealth adopted standards for access to public transport for people with a disability, which the states had discussed and developed following the Act's passage. These set minimum design requirements for:

- information on public transport services
- train stations and public transport interchanges
- tram and bus stops
- trains, trams and buses.

The standards are grouped into 30 areas with each applying to some or all of the infrastructure and vehicles used for tram, train, bus and coach services in Melbourne and regional Victoria. For example, one sets minimum requirements for signs at all stations, stops and vehicles for all public transport modes. In contrast, the standards for gateways incorporating ticket barriers apply only to metropolitan and regional rail stations.

A 20 to 30 year time line was mandated for fully complying with the standards because changing some aspects of the current public transport system is complex and costly.

The Commonwealth guidelines that accompany the standards expect upgrade programs to prioritise works in ways that will:

- maximise the short-term community and commercial benefits by giving priority to main routes or key facilities
- introduce accessible services according to locally set priorities after consulting with local government and passengers.

While the standards mandate minimum design standards, the section of the standards describing how the standards should be reviewed defines *effectiveness* as the extent to which the standards are successful in eliminating discrimination against people with a disability.

1.3 Government policy

Government policy aims to:

- improve public transport accessibility so that people with a disability have the same opportunities as others to take part in the life of the community
- meet the Commonwealth disability legislation and standards and the milestones except for some of the standards that would require the accelerated purchase of low floor trams.

The government decided to use existing trams for their 30 to 35 year design lives before replacing them with new low-floor vehicles that fully comply with the standards. This saves money by delaying the replacement of existing trams. However, it also means that the tram fleet will not comply with the 2012 milestone that requires 55 per cent of the tram fleet to be low floor.

1.4 Applying the government's policy

1.4.1 The Action Plan

In September 2006 the government published *Accessible Public Transport in Victoria—Action Plan 2006–2012* (the Action Plan). The Action Plan reflected government's overall goal of improving access to public transport services and stated its purpose: 'to ensure that at minimum, access is provided in line with the Disability Discrimination Act and the accompanying Disability Standards for Accessible Public Transport 2002.'

The Action Plan covers the vehicles and infrastructure listed in the following figure.

Figure 1A
Vehicles, stations and stops in the Action Plan

Mode	Total stations/ stops	Vehicles
Metro trains	209	329
Non-metro trains	81	93
Trams	1 777	411
Metro buses	23 800	3 060
Non-metro buses	6 600	470

Source: Victorian Auditor-General's Office, from *Accessible Public Transport in Victoria—Action Plan 2006–2012*.

The government program *Meeting our Transport Challenges (2006)* allocated \$1.3 billion for new trams and trains and \$250 million over 10 years to improve access to existing infrastructure. The department's business case set separate performance indicators to measure how well the plan achieved the objectives of:

- compliance with the standards
- the intended outcome of these standards of greater satisfaction with and greater public transport use by people with a disability.

1.4.2 Applying the Action Plan

The department is responsible for carrying out the Action Plan but some responsibility lies with the public transport operators, such as for the relatively low-cost improvements to the train and tram systems. Public transport services in Melbourne are delivered through contracts between private operators and the department.

The Action Plan also required fully compliant symbols and signs at Melbourne's train stations by the end of 2007.

The department set up an advisory group called the Public Transport Access Committee (PTAC), which meets quarterly and includes public transport operators and staff from the departments of transport and human services. The Minister for Public Transport appoints the representatives primarily from peak disability organisations. PTAC is the main forum for the minister to hear their views.

1.5 Audit scope and objectives

The audit examined whether the department has been effective in making public transport more accessible for people with a disability and others who face mobility challenges. It looked specifically at how accessible the department has made fixed route train, tram and bus services.

The audit examined how well actions had been:

- planned and prioritised
- implemented and monitored
- evaluated and plans amended to improve performance.

The audit was conducted in accordance with the Australian Auditing Standards for performance audits and included tests and procedures sufficient to enable audit conclusions to be reached. The cost of the audit was \$340 000, which includes staff time, overheads and printing.

1.6 Structure of report

The rest of this report contains two chapters.

Chapter 2 covers compliance with the disability standards and describes how the department:

- achieved the compliance targets
- managed the Action Plan program of works
- reported on its progress towards compliance.

Chapter 3 covers the accessibility outcomes. It looks at how well the department is progressing beyond compliance to the outcome of a fully accessible public transport system. It focuses on how the department:

- consulted the community
- planned its program of works
- evaluated its progress toward the outcomes.

2 Compliance with the disability standards

At a glance

Background

This chapter describes how well the Department of Transport has carried out the government's *Accessible Public Transport in Victoria—Action Plan 2006–2012*, in particular how well it managed the program of works, complied with the Commonwealth disability standards, and reported on progress.

Conclusions

The department has been largely successful in meeting the compliance targets set out in the disability standards except for some of the standards covering trams and tram stops that help people with a disability to board and alight from trams.

Overall the department's management of the Action Plan and reporting on compliance targets were adequate although there were some areas that needed to improve.

Recommendations

The Department of Transport should:

- strengthen its processes for monitoring the multiple agents responsible for bus stop upgrades, which will include creating a bus stop asset database
- address the compliance accuracy issues regarding the department's reporting on regional station upgrades, metropolitan bus stops and audible train announcements
- improve its management, review and oversight so that the disability components of projects are adequately incorporated into project designs and delivered as intended.

2.1 Introduction

The Department of Transport (the department) is responsible for the government's *Accessible Public Transport in Victoria—Action Plan 2006–2012* (the Action Plan).

While the disability standards apply in general to train, tram and bus vehicles and their supporting infrastructure, they cover 30 areas. These range from access paths and boarding, signs and symbols to lifts, booking services and audible announcements. The vehicles and infrastructure for each public transport mode have to be upgraded to the required standard for the system to comply overall.

The following table summarises the Commonwealth's schedule for achieving compliance.

Figure 2A
Disability standards compliance milestones

Milestone	Coverage	Comment
2007	25 per cent	Some standards require 100 per cent coverage
2012	55 per cent	Some standards require 100 per cent coverage
2017	90 per cent	Some standards require 100 per cent coverage
2022	100 per cent	Applies to all standards except for trains and trams
2032	100 per cent	Applies to all standards

Source: Disability Standards for Accessible Public Transport 2002.

Some areas of the standards require full compliance by 2007, such as waiting areas, signs and symbols, lighting, alarms, ticketing and information systems. In contrast trains and trams have until 2032 to achieve the last 10 per cent towards full compliance. All new services coming into operation after 2002 must fully comply with the disability standards.

The department measures compliance for each public transport mode against the 30 areas described in the disability standards.

2.2 Conclusion

The department has for the most part complied with the disability standards and has acted when aware of instances of non-compliance.

It has been largely successful in meeting the compliance targets set out in the disability standards, except for some of the standards covering trams and tram stops that help people with a disability to board and alight from trams.

Compliance levels fell well short of the standards in 2002 and 2007 and will continue to do so at the next compliance milestone in 2012, principally because of the government's decision to purchase 50 low-floor trams between 2012 and 2018.

The department is working on a plan to achieve system-wide compliance for trams and tram stops. It needs to complete this as a priority so that the community can understand how and when it will meet the disability standards.

Overall the department's management of the Action Plan was adequate but there were some areas that needed to improve, including:

- the management of bus stop upgrades by local councils, and regional station upgrades
- the way the department coordinates the works that contribute to the Action Plan.

Overall the information the department publishes is sufficient to understand how well it is complying with the disability standards. However, there were a small number of categories where the accuracy and clarity of the information should be improved.

2.3 Findings

2.3.1 Compliance with the standards

The department has for the most part successfully complied with the standards within the target dates, except for some of the standards for trams and tram stops.

The department published information showing how the vehicles and infrastructure for each public transport mode complied with the relevant standards areas as at June 2008. The 30 standards areas for infrastructure or vehicles for one or more of Victoria's public transport modes were grouped into 195 categories. Figure 2B summarises the results.

Figure 2B
Measures of compliance at June 2008

Level of compliance	Categories	
	Number	Percentage
100 per cent	94	48
At least 55 per cent (2012 milestone)	33	17
Between 25 and 55 per cent (met 2007 but not 2012 milestone)	51	26
Below 25 per cent (not met 2007 milestone)	17	9
Total	195	100

Source: VAGO adapted from Department of Transport material.

This shows the department had reached or exceeded the 2007 targets for 91 per cent of the compliance categories. For 17 categories (9 per cent) compliance fell short of that required in 2007. Trams and tram infrastructure accounted for about three quarters of this non-compliance. In particular the number of platform tram stops and modern low-floor trams was too low to meet the standards for helping people board trams.

The department expects to meet or exceed the 2012 requirements except for some aspects of trams and tram stops.

Trams

The Action Plan committed the department to comply with the standards except for trams and tram stops, given the cost of purchasing new trams and the cost and complexity of building tram stops that comply with the standards.

In 1998 the Commonwealth granted the state an exemption from complying with these standards. The exemption expired in 2004 and the department subsequently did not meet the 2007 target of 25 per cent compliance for trams or tram stops.

As of 2009, 100 (23 per cent) of the 426 tram fleet comply, which includes five low-floor trams that are leased and will be returned in 2011.

The government's policy of not replacing trams until the end of their design lives of 30 to 35 years means it will not meet the target of 55 per cent of trams being fully compliant by 2012. It has committed to buy 50 compliant trams between 2012 and 2018 to cater for increasing patronage and to speed up the compliance program. However, by the end of 2012 the percentage of the fleet that fully complies will be about 23 per cent, well short of the 55 percent target.

The department's modelling shows a growing gap in peak commuting periods between tram boardings and the fleet's capacity to accommodate the demand. The purchase of the additional trams will reduce but not eliminate this expected gap between peak demand and capacity.

Increased overcrowding is likely to make it more difficult for passengers to access peak services including those passengers that have a disability.

Tram infrastructure

Level access tram stops that allow passengers, such as those in wheelchairs to board low-floor trams did not meet the disability standards targets in 2002 and 2007, and will not meet them in 2012.

There are 1 777 tram stops with almost two-thirds requiring passengers to cross traffic lanes to board, and about one-third being sited on narrow median safety zones. In the project's early stage, the department had problems getting public acceptance for building accessible tram stops in most settings and this was a major barrier to meeting targets.

The department needed to address the perception that level access tram stop construction would have a significant and negative effect on traffic congestion, parking, business and resident access and, in extreme situations, local business viability.

Apart from a number of locations where the department upgraded high-volume tram stops, it gave priority primarily to upgrading tram stops which could be built as part of existing tram track upgrade projects, or at locations where there was space to do this or broad support from the local council and residents.

The department's 2006 business case for the Action Plan indicated that more than 560 stops, or about 32 per cent of stops that service more than 60 per cent of boardings, could be level access by 2012. By September 2009, the department had built 294 platform stops, or 16 per cent of all stops, that allowed level boarding onto low-floor trams.

The department is working on a plan to meet all compliance targets for tram infrastructure, which it intends to finalise by the end of 2009. The plan will need to take into account the potential impact of overcrowding on access for people with a disability.

2.3.2 Managing the Action Plan

The Action Plan described a program of works for 2006 to 2012 to meet the Act's requirements and its standards for information, vehicles and infrastructure.

The program of works has been delivered through:

- directly funded programs that cover train station, tram and bus stop upgrades, and pedestrian rail-level crossing upgrades
- major projects and programs where disability access is only one component and often a small one. These include station redevelopments and bus stop upgrades, which are part of the SmartBus and bus shelter replacement programs
- the train and tram operators' maintenance and renewal programs for smaller scale works, such as the installation of tactile indicators on station platforms for vision impaired people.

Some disability access works fall outside the Action Plan. For example, nine metropolitan councils contract out the building of bus shelters. While shelters are not required under the standards, their installation should trigger the upgrade of the bus stop to comply with the standards.

Examples of good management

The department managed directly funded programs well, having:

- responsible project officers who managed the contracts and regularly tracked progress against time and budget
- quality assurance that checked works met specifications
- consistent project reporting using the capital reporting information system

This applied to the directly funded programs for upgrading tram stops and train stations, and bus stops on arterial roads.

The delivery of the accessibility components within the SmartBus and bus shelter replacement program has been well managed.

The department also had adequate processes to verify that the maintenance and renewal program had delivered disability access improvements as intended.

Areas for improvement

Overall the department managed the Action Plan works adequately, however, there were some areas that needed to improve.

The department needs to strengthen:

- management of some parts of the program, including the bus stop upgrades by local councils and regional station upgrades
- the way it coordinates the works that contribute to the Action Plan.

Bus stop upgrades

The department needs to strengthen its quality assurance for bus stops upgrades delivered by local councils.

The department funded councils to upgrade local bus stops. The department audits the upgrades but there is a significant lag between the works' completion and the audit. In four councils about 13 per cent of upgraded bus stops did not fully comply with the standards, although the department counted them as compliant because the works had been completed. This inflates the department's reported level of bus stop compliance.

In nine metropolitan councils that contract out the building and maintenance of bus stop shelters, the department has no information on how well these bus stops comply with the standards.

There is currently no single, comprehensive depository of the information the department needs to manage bus stop assets.

The department should create such a database to help track and manage compliance with the disability standards, making the most of the work Metlink is doing to number and track the signage and bus information for each bus stop. The database should include records for the bus stops managed by local councils through their contracts with private shelter providers.

The department should also create processes so that it is notified of any relevant changes made to or in the vicinity of bus stops that affect accessibility. This would help prevent the instance observed where one council's works at a bus stop covered the tactile markings meant to guide people that are vision impaired.

Regional station upgrades

The department needs to improve its monitoring of the regional rail station upgrade program. The unclear allocation of oversight responsibilities has contributed to some delays and examples where works were not completed as required. For example, a 2008 departmental report showed some areas reported as compliant were found not to be.

Better coordination for improved delivery

The successful coordination of all the disability works that contribute to the Action Plan is a major challenge. The works are funded through multiple programs, designed and managed by different parts of the department and delivered by agents on the department's behalf.

In light of this it was not surprising to find examples where better coordination would have improved the design, implementation and reporting of disability access works.

Examples include:

- the way design standards for platform tram stops were applied
- determining the scope of works for metropolitan station upgrades.

The department applies the standards to design platform tram stops. The standards set minimum space requirements to allow two passengers in wheelchairs to pass each other on the platform. There are also standards for the minimum space for laying tactile ground indicators. About 20 per cent of the platform tram stops built to date do not meet these minimum requirements.

The department's project delivery and planning teams differed on how to apply the standards to building the platform stops.

Frankston Station offers an example where the department's accessibility unit, project team and rail assets division did not coordinate effectively to include disability access issues in project design stage.

The accessibility unit advised the project team to include works to remedy the risks for people with a disability using the pedestrian crossing. The project team did not respond or include it in the project scope.

Subsequently, the accessibility unit and the rail assets division worked together on the issue but the project team was not aware of their activities. Six months after the matter was raised the crossing was resurfaced as part of the rail operators' maintenance and renewal program.

Actions to address these issues

The department needs to:

- review and strengthen its processes for monitoring the multiple agents responsible for bus stop upgrades, which will include creating a bus stop asset database
- address the compliance accuracy issues raised for regional station upgrades
- improve its management, review and oversight to provide assurance that the disability components of projects are adequately incorporated into project designs and delivered as intended.

2.3.3 Reporting on compliance

Overall, the department provides sufficient information to understand how well it is complying with the disability standards. However, there was a small number of categories where it should improve the accuracy and clarity of the information.

The information it publishes should be correct and in a format that is useful to the public, which has an interest in public transport accessibility.

The transport operators collate information annually about the disability works completed on their respective systems. They then calculate a compliance level against a baseline audit of their systems. They forward this information to the department's accessibility unit for collation and publishing on the department's website.

In addition, up-to-date information on compliance is an important input to journey planning software so people with a disability have an accurate view on how well they can access different parts of the public transport system.

Concerns about the accuracy of reporting include:

- the information on the percentage of compliant metropolitan bus stops does not incorporate up-to-date quality assurance information
- audible train announcements on trains and ramps at tram stops are listed as 100 per cent compliant but the department acknowledges that system problems mean they do not deliver on this
- journey planning information may be misleading because it shows journeys between any metropolitan train stations are wheelchair accessible when it is clear that some stations do not have compliant access paths between train platforms and the station entrance.

Although these examples raise questions over the department's compliance reporting, they do not materially affect the fact that the department has been largely successful in complying with the disability standards described in the Action Plan.

Recommendations

The Department of Transport should:

1. Strengthen its processes for monitoring the multiple agents responsible for bus stop upgrades, which will include creating a bus stop asset database.
2. Address the compliance accuracy issues regarding the department's reporting on regional station upgrades, metropolitan bus stops and audible train announcements.
3. Improve its management, review and oversight so that the disability components of projects are adequately incorporated into project designs and delivered as intended.

3 Accessibility outcomes

At a glance

Background

Although the state must comply with the disability standards at a minimum, the spirit and intent of the *Disability Discrimination Act 1992* (the Act) is to modify public transport so that people with a disability use it more to travel safely, effectively and with dignity.

The disability standards are intended as the means to achieve these outcomes and this chapter assesses performance by examining how well the department:

- consulted the community
- planned its program of works
- evaluated its progress towards the outcomes.

This chapter describes the department's progress in achieving these outcomes.

Conclusion

Although the department has been generally effective in progressively complying with the disability standards, it has not adequately measured the impact of these standards on the outcomes for people with a disability. It now needs to do this.

Recommendations

The Department of Transport should:

- commission an evaluation of the effectiveness of the Public Transport Access Committee and as part of this address the issues raised in this audit
- undertake research to better understand the travel behaviour of people with a disability
- require disability access plans to include information showing how prioritisation principles have been applied to select and order works
- develop and apply an evaluation framework to understand how well disability access works have achieved their intended outcomes of increasing the travel and level of satisfaction of people with a disability.

3.1 Introduction

The state must apply the *Disability Discrimination Act 1992* (the Act) and comply with its standards at a minimum. The Act's spirit and intended outcome is to progressively eliminate discrimination, which is consistent with the government policy expressed in *A Fairer Victoria* and the *State Disability Plan*. This means modifying public transport so that people with a disability use it more to access the things they want to do safely, effectively and with dignity. The standards are the means to achieve these outcomes.

The business case for the Action Plan clearly articulated these different objectives. Figure 3A is based on the business case and includes:

- a first objective focused on the Act's intended outcome and measured by how much people with a disability use public transport and their level of satisfaction
- three further objectives more to do with complying with the standards.

Figure 3A
Action Plan business case objectives

Objective	Key performance indicator
1. To enable people with a disability to access the public transport system safely, effectively and with dignity (underlying principles of the Act).	<ul style="list-style-type: none"> • level of satisfaction of disabled community with the outcome • use of public transport by people with a disability compared with other members of the community • Incidence of complaints under the legislation.
2. To supplement existing work programs where these are insufficient to meet the requirements of the standards.	<ul style="list-style-type: none"> • audits of all infrastructure • gap analysis against committed programs.
3. To ensure Victoria's response to the requirements of the standards is appropriate.	<ul style="list-style-type: none"> • milestones for compliance specified in the standards for 2007 are met where it is reasonable to do so • programs developed to meet 2012 milestones.
4. To minimise the risk of successful complaints under the Act in relation to public transport in Victoria.	<ul style="list-style-type: none"> • acceptance of the Action Plan underpinning the program works • incidence of complaints under the legislation • successful defence of any complaint.

Source: Department of Transport: adapted from Table 5.1 in the department's business case, *Accessible Public Transport in Victoria January 2006*.

3.2 Conclusion

Although the department has been generally effective in most areas to date in complying with the disability standards, it has not measured how effective these works have been in improving accessibility for people with a disability. It recognised the importance of this type of evaluation in the Action Plan business case and now needs to compile the information to do it.

While the department and its agents developed sound prioritisation principles in their planning, they have not adequately documented how they applied the principles to determine priorities.

The department has not analysed the available information on the most popular routes and destinations for people with a disability, which is an important factor in setting priorities.

Consultation with the community

There is room for the department to improve and further develop the way it consults people with a disability. It has only a partial understanding of both how people with a disability use the existing system and their perception of the barriers to its increased use.

In some examples applying the disability standards did not adequately remove the barriers as intended. Figure 3B describes such an example. The department needs to understand where this happens, and if it detracts significantly from the intended outcomes, to remedy it.

Figure 3B

Case study—the gap between station platforms and metropolitan trains

Since June 2005 Public Transport Access Committee (PTAC) members have been raising as an access concern the size of the gap between platforms and stationary trains at some stations in Melbourne.

The department's response between June 2005 and September 2008 was that the current system of train drivers deploying ramps at these locations would remain as the means of providing compliant access.

At the front of the train a ramp is used to allow people using wheelchairs and motorised scooters to board the train. However, most of those experiencing difficulties were actually able to walk but still struggled to board trains where there was a large gap.

A 2007 peak body survey confirmed that the gap was a problem for some people with a disability.

In September 2008 the train operator told PTAC it was measuring the horizontal gap between trains and platforms and increasing the signage about being aware of these gaps. A PTAC member emphasised the importance of also measuring the vertical gap

The department needed to look beyond compliance to understand the significance of this problem for people with disability before working with the operators to determine the best way of addressing it

Source: Victorian Auditor-General's Office, based on PTAC minutes.

The department needs to understand and manage the results for people with a disability by improving the way it:

- understands how people with a disability use the system and the barriers preventing more widespread use
- responds to concerns and evaluates effectiveness by going beyond compliance to understand the outcomes affecting people with a disability.

The department should use existing information better and should access more information on the current and desired travel patterns of people with a disability.

Planning

The objectives of the Action Plan and its supporting business case were consistent with government policy and the Act except for some compliance timing for accessible tram stops and vehicles.

The plans included reasonable prioritisation principles but lacked detail on how the department had used them to determine priorities. Future plans should clearly explain and illustrate how priorities have been set and the conflicts between principles resolved.

This would be assisted by improved information on the public transport locations and routes that are likely to attract people with a disability.

Evaluation

Although the department has generally complied with the disability standards it has not adequately measured its performance against the intended outcome of enabling people with disabilities to use public transport safely, effectively and with dignity. It needs to measure the performance indicators in the Action Plan's business case.

This information will show where the application of the standards has been effective and highlight situations that require further improvement.

3.3 Findings

3.3.1 Consultation for accessibility outcomes

Two ways to gain information on accessibility outcomes are by engaging with the peak bodies representing people with a disability and conducting well-targeted research. The department used the Public Transport Access Committee as its main consultative forum and found it valuable.

Public Transport Access Committee (PTAC)

The department set up and administers PTAC as an advisory committee for the Minister for Public Transport. It meets at least quarterly and includes representatives from peak disability organisations, staff from the departments of transport and human services and public transport operators.

PTAC serves as a forum for the minister and the Director of Public Transport to consult with and brief members on access issues and initiatives.

As the principal way the department has engaged people with a disability PTAC has offered valuable insights into how to apply the disability standards.

PTAC members have been able to comment on public transport projects, sometimes take part in trials, raise issues when upgrades have not improved accessibility, and ask the department about its plans and priorities.

The peak bodies represented on the committee thought it was valuable but could work better. For example:

- the structure of meetings has hindered discussion and stifled debate:
 - meetings are taken up with lengthy technical presentations and reports
 - members must digest large volumes of technical material for some meetings and sometimes the department has not sent it to them early enough
 - since the department has not changed its practices, the members have become resigned to them
- the department issues minutes up to two months after meetings.

There is room to improve the way the department consults. It could, for example:

- involve PTAC earlier in the formative stages of a project when it has a chance to influence decisions
- give members enough time to review material
- keep members briefed about projects and how their input has been used.

There were several instances where the department did not respond adequately to PTAC members' concerns because it was focusing on compliance and not on accessibility outcomes. Examples include PTAC members' concerns over station signs, and the gap between station platforms and trains.

PTAC members were unclear about how the committee acquits its role of advising the minister. They were told that the minutes were sent to the minister. However, the minutes were lengthy, did not focus on key issues and this makes it difficult for a reader to quickly grasp the most important information. Members also noted that the minister had not sent a representative for years. The minister has, however, recently started sending a representative. The committee still doesn't know what advice the minister receives.

The department has standardised the way it shows how it has acquitted the actions arising from PTAC meetings, but needs to provide this information in advance of the next meeting.

The department intends to commission an evaluation of PTAC against its objectives, which should examine the issues raised in this audit. The department advised that contractors engaged for the purpose would do a structured evaluation.

The audit supports this type of evaluation. In doing this it is important that PTAC's members are adequately consulted about the terms of reference, the findings and the recommendations.

Research

Although the department has found PTAC a valuable consultative forum, it provides only a partial understanding of the outcomes for people with a disability who use or want to use the public transport system.

The department does not have:

- hard data on how many people with a disability or mobility limitations use public transport, the characteristics of this travel and if their use has changed as a result of the upgrades
- a good understanding about whether people with a disability or mobility limitations are satisfied with the outcomes, what they perceive as the remaining barriers to use, and what their priorities are for future changes.

The department should use existing information better and should develop additional information.

Although it did target measures to benefit the greatest number of passengers by using data on passenger totals, it did not systematically collect data on how, when and where people with a disability used or wanted to use public transport.

The most recent large scale survey on public transport and disability is more than 20 years old. In the United Kingdom, the Disabled Persons Transport Advisory Committee commissioned a large scale survey so it could advise the government more effectively.

A smaller scale local survey of people with visual impairments was completed in 2003 as the basis for prioritising the installation of Tactile Ground Surface Indicators (TGSIs).

The department did not systematically analyse demographic or land use data on places where people with a disability were likely to live or visit. This would usefully have contributed to the decisions on the timing and location of disability access works.

Although the department did have data on the destination of wheelchair accessible taxis to infer where people in wheelchairs might visit we did not see how this information had been used in its planning. The department advised this information had been used to demonstrate that people with a disability live and travel all over Victoria.

Where some works were prioritised for a small number of hospitals and universities, the department could not demonstrate that it had systematically identified the several hundred hospital sites in Victoria and fed the data into its plans.

The department needs to research:

- how people with a disability use public transport
- how they rate public transport
- whether the upgrades have encouraged greater public transport use
- the barriers that deter people from using public transport including, factors such as ignorance of the services or anxiety about using them
- the level of satisfaction with the department's improvement priorities.

As the department had no up-to-date research, three disability groups did an *Accessible Public Transport Watch Project* in 2007. It surveyed 130 people with a disability over three months about how they used public transport. It turned up valuable information about the difficulties people faced even in the parts of the system that were deemed to comply with the disability standards.

The project demonstrates the value of this type of research in understanding the effectiveness of measures to improve public transport access for people with a disability.

3.3.2 Planning for accessibility outcomes

Transforming an ageing public transport system into an accessible one is a large and complex task, something recognised by the Commonwealth when it allowed three decades for full compliance.

The audit expected the department to take benefits, costs and risks of specific works into account to achieve the government's aims in the best possible way.

The disability standards guidelines expected that programs would:

- maximise the short-term community and commercial benefits by giving priority to main routes or key facilities
- introduce accessible services according to priorities set locally in consultation with local government and passengers.

The department's plans and those of the operators responsible for applying parts of the Action Plan included reasonable prioritisation principles that conformed with government policy and the Act such as:

- complying with the Act's targets except for the tram system
- targeting high patronage locations so many public transport users would benefit
- targeting public transport near places that are more likely to benefit people with a disability
- taking into account the costs, challenges and operational constraints of specific projects
- coordinating activities so the upgrades complied with the disability standards.

The department did tackle high volume bus routes and tram stops as a priority. However, in general it could not supply documentary evidence to show how it had applied the principles to set priorities and resolve conflicts for trains and trams. It also did not know if local councils had used the principles when contracting out bus stop upgrades.

The department explained how it had prioritised works across the tram system. Platform stop upgrades were in locations that had high passenger volumes, would provoke less opposition and where the surrounding tram infrastructure was scheduled for renewal. Operational factors drove the allocation of low-floor trams to routes. For example, not all depots are equipped to house and maintain the more modern trams.

There was no documentation in any of the plans that adequately explained how the principles were applied to set the order for the completion of disability access works.

The PTAC minutes showed this gap in documentation. Members asked for information on priorities but the department has not adequately responded to those requests.

For example, committee members asked about priorities for:

- the coordination of accessible tram stops and low-floor trams
- upgrading of bus stops at local councils
- allocation of low floor buses to towns in the regions
- widening platforms for access to trains using the front door ramp.

We found no evidence of any adequate response to these requests. Future plans for disability access works should better explain how prioritisation principles have determined their order.

3.3.3 Evaluating accessibility outcomes

It is essential that the department regularly evaluates progress towards the government's aims. Such evaluation should measure effectiveness and guide the department in how it should amend or finetune its plans.

The department has information to understand what compliance means but it needs to significantly improve how it measures outcomes for people with a disability.

Many of the works completed to date are likely to improve access to public transport for people with a disability and for other passengers. For example, platform tram stops make it easier to board and alight from trams and tactile indicators on station platforms and bus and tram stops provide the vision impaired with help in locating a stop and boarding a vehicle.

However, the department has not measured these outcomes, does not know what has worked and, importantly, where these works have not led to the intended outcomes.

There were times when the department did not address accessibility concerns raised in PTAC because the area of concern complied with the disability standards.

The department's Action Plan business case described the program objectives and performance indicators that it would use to gauge success.

It has not, however, adequately measured whether people with a disability are satisfied with the results. Further, it does not demonstrate a clear understanding of how people with a disability use public transport, so cannot show how that might have changed as a result of the upgrades.

The department has counted complaints under the Act. The Action Plan included an aim of minimising the risk of successful complaints to the Human Rights and Equal Opportunities Commission.

A low number of complaints under the Act and their resolution is not a good indicator that public transport is accessible. Of eight complaints lodged with the department as at September 2009, five were about taxis and three were about scheduled public transport services, with one settled out of court. People with a disability may find it challenging to pursue civil court cases so the absence of this type of complaint does not equate with success.

Some PTAC members were interested in seeing data on the complaints made to the operators about access for people with a disability as this would be valuable for its role.

The department should review how it receives, processes and acquits complaints, including reporting them to PTAC as requested, so it can continue to improve accessibility.

For example, PTAC members reported that one of the most frequent complaints is about situations where operators' staff had not been helpful. The review of summarised complaints information showed that complaints about staff are consistently high across all transport modes, especially for buses and trams.

When people with a disability have a bad experience with public transport staff it diminishes the outcome of full accessibility. The department should regularly share this information with PTAC and decide on how to address the major complaint areas.

The department should start to evaluate results in terms of how they affect people with a disability. It should measure its achievements against the aims laid out in the business case.

The department recently set up a social transit unit. Acknowledging its past focus on engineering compliance, it told PTAC in March 2009 it would now focus on issues of accessibility, affordability and social inclusion.

The department has progressively addressed compliance issues and gained valuable experience. It now needs to widen its response to measure the accessibility outcomes and deal with situations where the standards have not delivered these outcomes. This includes investigating the significance of an access issue even when the system is compliant, and evaluating how well its programs have enabled people with a disability to use public transport safely, effectively and with dignity.

The department says:

- it has a good understanding of the barriers to accessing public transport and these have been well documented in the disability standards
- the standards were formed after lengthy consideration of how best to achieve the outcome of better access, and to redefine this questions the fundamental approach of the disability standards
- the department's obligation is to apply the standards and this will increase accessibility for people with a disability.

However, neither the department's understanding of the barriers nor the effort and expertise that went into setting the disability standards obviate the need for the department to evaluate how well it has achieved the intended outcomes.

As a matter of good practice all projects should include clear objectives, defined benefits and a plan to show how well these benefits have been realised. The business case for the Action Plan included these measures and the department now needs to apply them.

Recommendations

The Department of Transport should:

4. Commission an evaluation of the effectiveness of the Public Transport Access Committee and as part of this address the issues raised in this audit.
 5. Undertake research to better understand the travel behaviour of people with a disability.
 6. Require disability access plans to include information showing how prioritisation principles have been applied to select and order works.
 7. Develop and apply an evaluation framework to understand how well disability access works have achieved their intended outcomes of increasing the travel and level of satisfaction of people with a disability.
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