

ACCESSIBLE TRANSPORT PLAN – OVERVIEW

Introduction

This Accessible Public Transport Plan has been designed in accordance with the Disability Discrimination Act 1992 and related guidelines/standards.

It is the intent of this plan to ensure that our services are not discriminatory, either directly or indirectly, by ensuring compliance to the relative standards of accessibility within the time frames set.

Where compliance is unable to be achieved as a result of design restrictions or other circumstances beyond our control equivalent access will be provided with direct assistance if necessary.

Adoption

The following standards apply from the date they come into effect under section 31 of the Disability Discrimination Act 1992. Our industry being Public Transport is primarily expected to become accessible by replacement or upgrading of conveyances, premises and infrastructure at the end of their service lives.

It is the intention of this company to fully comply with the Disability Standards for Accessible Public Transport within the time frames set. The action plan below clearly outlines time frames for compliance and our ongoing commitment to Accessible transport now and in the future.

Many of the standards apply to infrastructure and premises that interlink with our services, but are not under our direct control. In these situations, management will liaise with the other companies/authorities concerned and offer assistance where possible to help those companies/authorities adhere to the required standards.

Compliance

The Disability Discrimination Act 1992 provides compliance targets in relation to services and standards. The respective services that apply to our operation are listed individually in the action plan below, and we are committed to compliance with the following legislation across all operations within our business:

- The DDA legislation Act 1992
- The Anti-Discrimination Act 1977 (NSW)
- The Disability Inclusion Act 2014 (NSW)
- The Guidelines for Disability Action Planning by NSW Governmental Agencies

Equivalent Access

Equivalent Access is an alternative method of assisting passengers with disabilities to use public transport (our services) where there are unavoidable constraints on unassisted access. Equivalent access must provide the equivalents of amenity, availability, comfort, convenience, dignity, price and safety.

As far as possible, we must be able to demonstrate that any equivalent access provides public transport 'without discrimination'. For example we are unable to use the services of an accessible taxi as a substitute for an inaccessible bus service (segregated or parallel service).

Direct Assistance

The Disability Standards do not prevent any company from offering assistance directly to passengers as a means of providing equivalent access in situations where the standards have not been met.

Direct Assistance can be provided before and after travel, during travel and during boarding and alighting.

Premier Motor Service has accessible vehicles, however, it is our policy to encourage passengers with disabilities requiring direct assistance to travel in the company of a trained carer. Carers travel at the concession rate unless they are providing direct assistance, in which case they are permitted to travel free of charge.

Access Paths

Access path is used in the standards to specify requirements for the independent movement of passengers through premises and infrastructure.

In relation to our operations, both coach and local route services, reference to access paths relates mainly to offices and other premises utilised by our passengers (meal break locations etc.).

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Manoeuvring Areas*Local Route Service*

Passengers with mobility aids or in wheelchairs must be able to enter and exit a conveyance and position their aids in the allocated space. If it is not practicable, equivalent access is to be provided by direct assistance. This could be with the assistance of a carer or other trained person.

Company employees do not possess the required training and as such, must not provide direct assistance, as injury could result.

The allocated space on compliant vehicles can be used for other purposes as long as they remain available for use, if required, by passengers using mobility aids.

Passing Areas

Passing areas refer primarily to infrastructure and as such, the standards apply to owners of our offices / meal break locations.

Ramps

Where boarding ramps are utilised (either internal or external) to assist passengers with disabilities to board and alight our vehicles, they must comply with the correct Australian Standards.

All ramps presently used by this company are part of the bus as supplied by the bus builder and all manufacturer standards and guidelines are adhered to.

Waiting Areas

In any office/terminal where a waiting area is provided, there must be a minimum of 2 seats or 5% of the seats identified as available for passengers with disabilities.

In the same area, there must be a minimum of 2 allocated spaces or 5% of the area must be available for passengers with disabilities.

Boarding

If the disability standards are observed, passengers with disabilities will be able to board and alight from conveyances without assistance. With low-floor buses, this should be possible where there is kerb and guttering.

However, at other locations, this may prove difficult depending on the surface at the boarding point. Where no kerb and gutter is provided, the boarding point should be at the very least flat and stable.

Allocated Spaces

Allocated spaces are to comply with the applicable standards pertaining to dimensions, minimum number allowable and signage.

One allocated space is to be provided on conveyances with fewer than 32 fixed seats and 2 allocated spaces on conveyances with more than 32 fixed seats.

Allocated spaces can be used for other purposes, however, they must be made available for passengers with disabilities if required.

Where possible, allocated spaces are to be consolidated (together) to create a larger manoeuvring area, also permitting companions to be seated together.

Surfaces

The surfaces of conveyances must comply with the disability standards, which require them to be stable, level across width and slip-resistant.

The surface of access paths must also comply with these standards and as such, the company will liaise with various landlords and authorities regarding premises not within our direct control.

Handrails and Grabrails

Handrails (if fitted) and / or grabrails are to comply with the appropriate standards.

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It is expected that the bus / coach builder will ensure that any new vehicle purchased with disabled access will comply with these standards.

Doorways and Doors

An inspection of all conveyances with disability access appears to confirm that all vehicles concerned comply with the standards for door access and activation. Ongoing inspections will ensure that all vehicles continue to comply with relevant standards and all new vehicles purchased will be assessed to ensure compliance prior to acceptance.

Premises such as meal locations, offices and coach terminals are not within our direct control.

Stairs

It is the intent of the disability standards that stairs should not be the only means of access to a conveyance. This does not pose a problem for route bus services with the introduction of low-floor disability access buses.

With the introduction of new Wheelchair Accessible Coaches, we now have the capability to enable passengers to board without the necessity to negotiate the coach stairs.

Symbols

All conveyances with disability access must have the correct symbols for accessibility and deafness attached as per the standards.

Standard symbols also apply to offices / meal break locations where we have no direct control. Management will liaise with the relevant owners / authorities regarding this issue.

Signs

All signs on conveyances, including destination signs, must comply with the relevant standards of dimension, location, illumination, visibility and lettering.

Signs also apply to offices/meal break locations where we have no direct control however, management will liaise with the relevant owners/authorities regarding any issues or concerns.

Tactile Ground Surface Indicators

Tactile surface indicators are to be used to define key areas on access paths / entrances for people with vision impairment. Location, style and dimensions are to comply with the standards.

This section applies mainly to locations such as offices, terminals and meal break locations which are not under our direct control however any concerns will be communicated to the relevant premises owner or landlord.

Alarms

Emergency warning systems and / or alarms if fitted must comply with the relevant standards i.e. visual and sound alarms.

This section applies mainly to locations such as offices, terminals and meal break locations which are not under our direct control however any concerns will be communicated to the relevant premises owner or landlord.

Controls

Controls for opening and locking passenger operated doors are to comply with the relevant standards. On our conveyances this would only appear to relate to the toilet doors in the coaches as all other doors are operated by the driver.

Signalling devices on buses (stop buttons) must comply with the standards and are inspected as part of our regular vehicle inspection process.

Payment of Fares

The Disability Standards for Accessible Public Transport state that all passengers must be prepared to pay fares.

The method of paying fares and validating tickets must not require actions from passengers with disabilities that exceed the requirements of other passengers.

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Hearing Augmentation – Listening Systems

This section applies to public address systems if installed. At our terminals and depots any public address systems are installed and maintained by the landlord / owner hence it would appear to be their responsibility to ensure systems comply with the standards.

Information

It is the policy of this company to provide all passengers with information necessary to use our transport service. This is achieved by providing access to printed service schedules, internet website, information in person at our offices or from service drivers / inspectors and by contacting our staff via the telephone.

This company does assume that passengers have a minimum level of literacy and language skills and also acknowledges that not all information can be provided in certain formats from certain outlets i.e. drivers may only be able to provide oral information.

This company will endeavour to provide information in a variety of formats. Where we cannot supply information in a passenger's preferred format, equivalent access will be given using direct assistance if necessary.

Priority

On all unbooked services there will be two priority seats set aside for passengers with disabilities and other groups in need of assistance.

These seats (including allocated spaces) can be used by other passengers on the understanding that they must be vacated if required by passengers with disabilities.

Practical Application

In addition to imposing responsibilities on operators of services and providers of infrastructure, the Guidelines to the Standards indicate that passengers must also be able to:-

- Understand information given in spoken, written, tactile or diagrammatic form
- Have the capacity to use a mass transit system
- Select their destinations, modes and times of travel, and
- Communicate their destinations where necessary

Although this would mean that some persons with more severe physical and intellectual disabilities may not be able to access the public transport system, Premier concurs with the Standard's aim of eliminating discrimination 'as far as possible' against people with disabilities.

Accessible Transport Action Plan

Action	Implementation Strategy	Performance Measures	Timeframe
Fleet Compliance with DDA legislation	Revise current fleet and service availability to enable provision of 100% of regular scheduled accessible services as per DDA Requirements	100% of regular scheduled accessible services in line with DDA requirements	December 2022
Compliance with Legislation and Governmental Guidelines	Ensure that company policies and procedures comply with DDA legislation, Anti-Discrimination Act, Disability Inclusion Act and Governmental Guidelines. Provide relevant staff training to ensure that the above policies and procedures are met.	Regular reviews of Policies and Procedures to ensure ongoing compliance against legislation. Induction Training audit to ensure all staff are provided with Disability awareness training and communications campaign delivered	Ongoing
Carry out the Operators obligations relating to Transit Stops and Transit Stop Signage	Monitor Transit Stops and Signage as part of our ongoing maintenance plan and liaise with TfNSW or	Up to date signage including timetables	Ongoing

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	local council regarding any concerns.		
Ensure all Bus handrails, grabrails and doorways comply with relevant standards	Check existing vehicles with disability access comply with standards Regular inspection of existing disability access vehicles to ensure they continue to comply Ensure that all new vehicles purchased comply with standards	All vehicles comply with standards	Ongoing
Ensure all vehicles have correct signage and symbols for accessibility as per the standards	Ensure all signage and symbols comply with standards	All vehicles comply with standards	Ongoing
Ensure that Access Paths and Passing Areas meet DDA Compliance	Inspect all offices, and meal break locations to ensure access paths and infrastructure comply with standards. Liaise with landlords or proprietors of these premises in relation to compliance and reassess stop location if necessary	Compliance with Standards	Ongoing
Bus Stops and waiting area to comply with Accessible Transport Plan	Regular inspections of passenger bus stops and waiting areas as part of our maintenance compliance to include DDA Accessibility. Liaise with TfNSW or local council regarding any concerns found to ensure any compliance issues are identified and reported.	Compliance with Standards	Ongoing
Enable compliance of accessibility requirements at Transit Stops and Licensed Areas	Work with TfNSW and other local/state government bodies to facilitate and enable compliance of accessibility requirements at Transit stops and Licensed Areas	As per the DDA Legislation	Ongoing
Coordinate the Operator's accessible transport services with the accessible services and infrastructure on Connecting Passenger Operators	Coordinate the Operators accessible transport services with the accessible services and infrastructure of Connecting Passenger Operators	100% DDA compliant buses on scheduled services	December 2022
Ensure that the Accessible Transport Plan is available to Passengers on our website and on request	Current copy of the Accessible Transport Plan is published on our website and available on	Plan published on website	Ongoing

	request to all passengers, free of charge		
Ensure that all staff are provided with necessary training to support Accessible transport across all services	Induction training to include specific training on our policies and procedures in relation to dealing with passengers with a disability and accessible transport. Wheel chair ramp operation training also provided to drivers	Fully trained staff – 100% of our Drivers are adequately trained on bus accessibility features and the correct operation of them.	Ongoing
Ensure that all DDA vehicles have allocated spaces for passengers with disabilities as per the standards set	Ensure all vehicles have appropriate number of allocated spaces as per standards. Ensure allocated spaces comply with standards for dimensions, access and signage Ensure that all new vehicles purchased meet standards for allocated spaces for passengers with a disability	All DDA vehicles comply	Ongoing
Aim to provide access to passengers with disabilities to board and alight from vehicles without assistance where possible.	Ensure that boarding devices comply with standards such as minimum weight limits. Prepare list of nominated boarding locations for passenger and make available to public. Ensure all new vehicles purchased comply with standards.	All vehicles comply and boarding list available	Ongoing
Ensure that all vehicles have a minimum of 2 priority seats allocated for passengers with disabilities.	Ensure that 2 seats are allocated for priority seating on all non-booked services Ensure applicable signage accompanies these seats	All vehicles comply	Ongoing