



Response to the Transport for NSW:

DISABILITY ACTION PLAN
Consultation Draft v1

October 2012
Council of Social Service of NSW (NCOSS)
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About NCOSS

The Council of Social Service of NSW (NCOSS) is the peak body for the non-government human services sector in NSW. Through its organisational membership, NCOSS represents a vast network of service delivery and consumer groups.

NCOSS has a vision of a society where there is social and economic equity, based on cooperation, participation, sustainability and respect.

We work with our members, the NSW Government and other relevant agencies, towards achieving this vision in New South Wales.

Recommendations

1. The relationship between the DAP, the NSW Ageing Strategy, and the Long Term Transport Master Plan should be clarified.
2. If the DAP intends to address both the needs of older people and people with disability, the differences between these groups should be identified and clearly articulated, with targeted strategies developed as appropriate.

If the DAP is specifically targeting people with disability, Transport for NSW should conduct further work and develop a plan to address barriers to access experienced by older people, Aboriginal people, people from CALD backgrounds, and people with low levels of numeracy and literacy.
3. Improving the accessibility of our transport system should be treated as a mainstream issue, providing benefits for all transport customers.
4. Equivalent access should only be provided in instances where meeting specified standards would result in unreasonable hardship.
5. Transport for NSW should develop strategies to engage with customers who are currently unable to use our public transport system.
6. A list of prioritised stations should be published, or at the very least, a list of criteria used to prioritise stations together with the data and information used to assess stations against these criteria.
7. The NSW Government should establish a funding program to support local authorities to upgrade the network of bus stops to improve accessibility.
8. Transport for NSW should require all operators to publicly report on annual progress against agreed Disability Action Plans.
9. A review of the adequacy of existing disability parking spaces – the number of spaces, their size and location – should be conducted prior to the introduction of new policies introducing timed disability parking spaces.
10. Transport for NSW should work with relevant agencies to identify gaps within the transport system for people with disability and to develop a clear and coordinated strategy to address these gaps.
11. The accessibility gap should be considered during the redesign of the bus network with appropriate local, flexible or demand-responsive services developed to address this gap.
12. The impact on disability transport services resulting from moves towards person-centred approaches should be carefully considered to ensure the transport system is well positioned to respond.

13. The Taxi Transport Subsidy Scheme should be reviewed with consideration given to the introduction of a two-tiered scheme; the subsidy cap should be increased from \$30 to \$50, and a smart card system should be introduced immediately.
14. Transport for NSW should work with the NSW Ministry of Health to address the outstanding issue of health-related transport and to ensure it does not limit the ability for community transport providers to address other transport needs.
15. Community transport operators should be accredited under the Passenger Transport Act.
16. The DAP should clarify the travel training needs it is seeking to address.
17. Transport for NSW should develop a travel-training program comprising two streams to be rolled out across NSW.
18. Advertising campaigns should be developed in consultation with the disability sector to raise awareness and understanding of the experiences of people with disability amongst all transport customers.
19. Real-time information on lifts that are closed for maintenance or repair should be incorporated into the 131 500 transport service.
20. Where service disruptions occur, replacement services should be accessible to people with disability, or alternative services provided.
21. Transport for NSW should work with transport operators across NSW to publish relevant information on accessible services and introduce accountability measures to ensure operators run according to their published timetables.
22. In developing integrated ticketing system pricing and penalty policies, Transport for NSW should ensure that people with intellectual disability or other cognitive impairments are not unfairly disadvantaged.
23. Partnerships should be supported by the delegation of sufficient power and the allocation of sufficient resources.
24. Current disability employment levels within Transport for NSW should be published as a baseline measure within the DAP.
25. The agency or division responsible for each action should be specified.
26. A template for annual reporting should be developed that will provide updates on progress against each of the recommended actions.
27. Baseline measures should be published to provide transparency and greater accountability.
28. Where possible, indicators should be reframed to measure outcomes rather than outputs.
29. Provisions should be made to update the plan as required, in consultation with the Accessible Transport Advisory Committee, with a comprehensive review in five years.

Introduction

NCOSS welcomes the development of Transport for NSW's new Disability Action Plan. Together with the Long-Term Transport Master Plan, this represents an opportunity to make a real difference in the lives of people with disability by ensuring our transport system provides a more effective enabling service, rather than presenting barriers to opportunity and independence.

We appreciate this opportunity to comment on the draft Disability Action Plan, and to work with the NSW Government to develop a transport system that is better able to meet the mobility needs of people with disability.

Legislative and Policy Frameworks

The Disability Action Plan (DAP) sets out how Transport for NSW will comply with relevant legislation, particularly the:

- The Disability Standards for Accessible Public Transport 2002, agreed under the Disability Discrimination Act 1992
- The Disability Access to Premises Standards 2010
- The Disability Services Act 1993

While, to a large extent, the plan focuses on legislative compliance, it also supports a number of policy frameworks, particularly:

- The National Disability Strategy
- The NSW Ageing Strategy

As it currently stands, the DAP alone will not provide adequate support for the transport components of these policy frameworks.

While there is some overlap between the barriers older people experience in accessing transport and the barriers experienced by people with disability, there are also many differences. By conflating the needs of older people and people with disability, the DAP does not recognise these differences. This approach risks diluting the effectiveness of policies and strategies aimed at supporting greater inclusion and independence for either group, and runs counter to policy directions – such the separation of Home and Community Care services – that place greater emphasis on the need for more tailored approaches.

In its current iteration, the plan focuses on the needs of people with disability, but also makes some reference to older people. It is not clear whether this plan should therefore also be interpreted as the primary mechanism through which Transport for NSW will meet its obligations under the Ageing Strategy.

We note that the NSW Ageing Strategy states that the Long Term Transport Master Plan for NSW will:

“Respond to the transport challenges of the ageing population, including the public transport and community transport needs of older people.”

While the Long Term Transport Master Plan acknowledges that an ageing population is a challenge for our transport system, the only specific action identified in the Plan in response to this challenge is:

“An updated NSW Disability Access Plan that will be integrated into the Long Term Transport Master Plan to work towards a widely accessible transport system.”

There is, therefore, a need to clarify the relationship between the DAP, the NSW Ageing Strategy, and the Long Term Transport Master Plan.

Recommendation 1: The relationship between the DAP, the NSW Ageing Strategy, and the Long Term Transport Master Plan should be clarified.

If the DAP intends to address the needs of both people with disability and older people, the differences between these groups should be identified and clearly articulated, with targeted strategies developed as appropriate.

If the DAP is specifically targeting people with disability, Transport for NSW should conduct further work and develop a plan to address barriers to access experienced by a range of other groups including:

- Older people
- Aboriginal people
- People from culturally and linguistically diverse backgrounds
- People with low levels of numeracy and literacy

Recommendation 2: If the DAP intends to address both the needs of older people and people with disability, the differences between these groups should be identified and clearly articulated, with targeted strategies developed as appropriate.

If the DAP is specifically targeting people with disability, Transport for NSW should conduct further work and develop a plan to address barriers to access experienced by older people, Aboriginal people, people from CALD backgrounds, and people with low levels of numeracy and literacy.

Potential population for Accessible Transport

While NCOSS contends that there is a need to identify, understand and address the specific barriers to access experienced by a range of different groups within our community, we strongly support treating accessibility as a whole as a mainstream issue.

As the DAP acknowledges, improving the physical accessibility of our transport system will not only benefit people with disability but other people with mobility limitations including many older people. It will also benefit a range of other transport customers including:

- Parents with prams
- People carrying luggage
- People with bicycles
- People who are unwell or injured

Many investments in accessible transport also benefit all public transport users by creating higher standards of comfort and convenience. Clearer announcements and signage can make it easier for everyone to navigate the public transport system, while physical improvements to conveyances can reduce boarding and alighting times for able-bodied passengers.

Recommendation 3: Improving the accessibility of our transport system should be treated as a mainstream issue, providing benefits for all transport customers.

Guiding principles

The DAP identifies a number of principles that will guide and influence the implementation of actions towards a more accessible transport system. NCOSS supports the majority of these principles, and makes a number of comments in relation to each below:

Access for the entire community

As noted above, investments in accessibility can benefit the entire community. NCOSS believes that accessibility should be treated as a mainstream issue, and not as an issue relevant only to a discrete minority. This position will be reiterated in our submission to the Draft Long Term Transport Master Plan.

While we contend that understanding the range of requirements necessary for public transport users is important, so too is ensuring that changes made to benefit one group of users do not create barriers for others. Solutions should be developed that examine the best way to cater for everyone, in line with principles of universal design.

Whole of journey accessibility

NCOSS welcomes a focus on whole of journey accessibility rather than on making isolated pieces of infrastructure compliant. For someone with restricted mobility, it can be impossible to reach a desired destination without a continuously accessible path from the beginning to the end of their journey. Compliance as measured in terms of the percentage of accessible stops, stations or buses becomes meaningless to someone who is prevented from making use of this infrastructure because they cannot make the first connection from their home to a bus stop or station.

In order to facilitate an approach that focuses on whole of journey accessibility, a better understanding of the travel patterns of people with disability will be needed. In addition, there is a need for more coordinated planning between transport agencies, operators and local government, supported by the delegation of sufficient power and the allocation of sufficient resources (see our response to Objectives 2 and 5 below).

Equivalent access

It is not clear how equivalent access will be used as a guiding principle by Transport for NSW. We suggest that equivalent access should only be provided in instances where meeting specified standards would result in unreasonable hardship.

As outlined in the Physical Disability Standards for Accessible Public Transport, people with disability should be consulted about any proposals for equivalent access, and operators and providers must be able to demonstrate that equivalent access provides public transport without discrimination 'as far as possible'.¹

Recommendation 4: Equivalent access should only be provided in instances where meeting specified standards would result in unreasonable hardship.

Reduction in transport disadvantage

The DAP recognises that people with disability can experience significant transport disadvantage and that this can result from issues related to both accessibility and affordability. We welcome an approach that focuses on the needs of people with disability, and commits to addressing transport as a barrier to inclusion and independence. This is discussed in more detail under Objective 2 below.

¹ See sections 33.3 to 33.5 of the Physical Disability Standards for Accessible Public Transport.

Engagement of people with disability

NCOSS strongly supports the commitment to better engaging people with disability and incorporating consumer knowledge into the development of programs and plans.

We note that the Transport for NSW definition of customer includes both current and potential customers. While the DAP identifies a number of strategies to better engage with existing customers, there is also a need to engage with customers who are currently unable to use our public transport system. Failure to do so risks further isolating these customers.

Recommendation 5: Transport for NSW should develop strategies to engage with customers who are currently unable to use our public transport system.

Strategic Objectives and Outcomes

As noted above, in our response to this plan we have assumed that the plan intends to focus on people with disability, and does not form the basis of the Transport for NSW response to the NSW Ageing Strategy.

If this assumption is incorrect, we believe that further development of the plan and additional consultation is required. For example, under Outcome 3 the plan overlooks the needs of older people to access transport information, especially older people who cannot use or don't have access to smartphone and internet technology. Similarly, under Outcome 6, the plan does not identify any actions towards improving employment goals for older workers, whereas the NSW Ageing Strategy states that the NSW Government will promote age-friendly employment practices such as flexible work practices, employer awards, corporate champions and best-practice guidelines.

1. Building an accessible public transport network

Amongst other things, this objective sets out how Transport for NSW will comply with the Physical Disability Standards for Accessible Public Transport. These standards are due to be reviewed in late 2012. Following this review, the DAP should be updated in response to the review's recommendations (See Recommendation 29).

Comments in relation to specific modes are below.

Trains

The DAP states that the prioritisation of Easy Access upgrades for train stations will be based on a number of factors including station patronage, local demographics, access to educational and medical centres, parking, bus services, shopping, tourism and whether the station is a rail interchange.

NCOSS supports the use of clear and consistent criteria to prioritise stations for upgrading. Ideally, a list of prioritised stations should be made public. At the very least, the criteria used to prioritise stations should be published in the DAP together with the available data used to assess stations against these criteria.

Recommendation 6: A list of prioritised stations should be published, or at the very least, a list of criteria used to prioritise stations together with the data and information used to assess stations against these criteria.

Buses

The provision of accessible bus stops and roadside infrastructure are a critical component of an accessible public transport network. As the DAP notes, the majority

of this infrastructure is owned and maintained by local government authorities, who do not have access to the funding required to provide the necessary improvements. In our 2013-14 Pre-Budget Submission, NCOSS will recommend that the NSW Government establish a funding program to support local authorities to upgrade the network of bus stops to improve accessibility.

Recommendation 7: The NSW Government should establish a funding program to support local authorities to upgrade the network of bus stops to improve accessibility.

In relation to requiring all bus operators (and operators of other modes of transport) to comply with disability legislation, we recommend that Transport for NSW also require all operators to publicly report on annual progress against agreed Disability Action Plans. We have recently written to Transport for NSW concerning this and a number of other matters relating to the metropolitan bus contracting process.

Recommendation 8: Transport for NSW should require all operators to publicly report on annual progress against agreed Disability Action Plans.

Mobility Parking Scheme

NCOSS is currently part of the Independent Advisory Committee tasked with reviewing the Mobility Parking Scheme. Our response to the discussion paper and recommendations in relation to the scheme can be downloaded from <http://www.ncoss.org.au/resources/120719-NCOSS-submission-MPS-Review-discussion-paper.pdf>

We note that the number and dimensions of disability car spaces may sit outside the scope of the review and have recommended that a review of the adequacy of existing disability parking spaces – the number of spaces, their size and location – be conducted prior to the introduction of new policies introducing timed disability parking spaces.

Recommendation 9: A review of the adequacy of existing disability parking spaces – the number of spaces, their size and location – should be conducted prior to the introduction of new policies introducing timed disability parking spaces.

2. Reducing transport disadvantage

Existing programs that contribute to reducing transport disadvantage are outlined on pages 22-24 of the draft Plan, while proposed actions for the next five years are summarised on pages 34-35.

As the plan acknowledges, many people with disability experience transport disadvantage which creates a barrier to independence and can limit opportunity for employment or education, participation in community or cultural activities, and the ability to maintain social networks.

While both community transport and the Taxi Transport Subsidy Scheme provide supplementary transport for people who are unable to access mainstream public transport services, gaps in the system mean that many people are still missing out. These gaps exist in terms of eligibility – with some people not meeting the eligibility criteria for either community transport or the taxi transport subsidy scheme, and in terms of the restrictions on activities for which these forms of transport can be used.

Transport for NSW should work with NSW Family and Community Services and other relevant agencies to gain a more complete understanding of the transport needs of people with disability to identify gaps within the current system, and to develop a clear strategy that outlines the ways in which different modes of transport will work together to address these gaps.

Recommendation 10: Transport for NSW should work with relevant agencies to identify gaps within the transport system for people with disability and to develop a clear and coordinated strategy to address these gaps.

The accessibility gap

One gap within the current transport system is the accessibility gap, affecting people who are prevented from using public transport services because they cannot cover the distance from their front door to the nearest station or stop. This is an issue for many people with disability.

The draft Long Term Transport Master Plan outlines plans to redesign the bus network to create a three-tier system comprising local, intermediate and rapid transit services. While moves towards more direct, more frequent services may provide benefits for many public transport users, they also have the potential to exacerbate the accessibility gap if adequate attention is not also given to the development of local, flexible or demand-responsive services to address this gap.

Recommendation 11: The accessibility gap should be considered during the redesign of the bus network with appropriate local, flexible or demand-responsive services developed to address this gap.

Person-centred approaches

Moves towards person-centred approaches in NSW, together with the introduction of a National Disability Insurance Scheme, are likely to have a significant impact on the way in which people with disability access transport services. These impacts should be carefully considered to ensure the transport system is positioned to respond in such a way so as to ensure financial sustainability for both people with disability and the Government.

Recommendation 12: The impact on disability transport services resulting from moves towards person-centred approaches should be carefully considered to ensure the transport system is well-positioned to respond.

Taxi Transport Subsidy Scheme

While the Taxi Transport Subsidy Scheme is designed to make taxi travel affordable for people who are unable to drive or use other forms of public transport, for many people with disability – particularly those on low fixed wages – the cost of taxis, even with the subsidy, has become prohibitive. This scheme should be reviewed as part of the forthcoming review of incentives for wheelchair accessible transport.

Transport for NSW should increase the subsidy cap from \$30 to \$50² and should consider introducing a two-tiered scheme, with a higher level of subsidy available to some users. The smart card trialled in 2004 should be introduced immediately.

Recommendation 13: The Taxi Transport Subsidy Scheme should be reviewed with consideration given to the introduction of a two-tiered scheme; the subsidy cap should be increased from \$30 to \$50, and a smart card system should be introduced immediately.

² The subsidy cap of \$30 for this scheme has not been increased since 1999, despite numerous recommendations to do so. Over the same time period, taxi fares have increased by more than 60%.

Community Transport

Community transport is primarily funded to provide transport for frail aged people, younger people with disabilities and their carers. Funding guidelines restrict the purposes for which community transport can be used, meaning it is not able to meet the transport needs of many people with disability. While the Home and Community Care program (which provides the majority of funding to community transport) was initially designed to provide social inclusion services, it is increasingly being used to plug gaps in the health transport system, further isolating people with disability³.

Recommendation 14: Transport for NSW should work with the NSW Ministry of Health to address the outstanding issue of health-related transport and to ensure it does not limit the ability for community transport providers to address other transport needs.

NCOSS welcomes the review of Passenger Transport Legislation and the opportunity this provides to accredit community transport under the Act. People who use community transport are entitled to the same standards and safety guarantees as other public transport passengers. Furthermore, inclusion under the Act will potentially enable community transport to expand its role in addressing the accessibility gap and other issues of transport disadvantage.

Recommendation 15: Community transport operators should be accredited under the Passenger Transport Act.

Travel Training

Travel training has been identified as an area of significant need by a number of groups including people with disability, older people who no longer have access to private transport, people with low levels of numeracy and literacy, and Aboriginal people.

The types of training that might be suitable for these groups ranges from information days at public libraries and neighbourhood centres to group outings to one-on-one training offered over a number of days or weeks.

It is unclear what travel training needs the DAP is attempting to address. Nor is it clear what kind of travel training will be provided by the Metropolitan Bus Contract Operators, and why they have been considered the most suitable organisations to deliver this training.

The DAP should provide greater clarity around the travel training needs it is seeking to address. We propose that a program consisting of two streams should be developed. One stream should fund travel training for people that require individualised training support (to be delivered by disability service providers, including community transport). The other stream should fund information sessions and/or group training targeting a broader range of needs, and could be delivered through a range of mechanisms as appropriate to the target audience.

Recommendation 16: The DAP should clarify the travel training needs it is seeking to address.

³ Research commissioned by the Cancer Council NSW, NCOSS and the Community Transport Organisation in 2007 found that in the ten years from 1996 to 2006 the number of health transport trips delivered by community transport providers more than doubled, with approximately 90,000 requests for transport to health services refused each year. The full report can be downloaded from <http://www.ncoss.org.au/resources/120123-No-Transport-No-Treatment.pdf>.

Recommendation 17: Transport for NSW should develop a travel-training program comprising two streams to be rolled out across NSW.

3. Improving the journey experience of people with disabilities

A culture of inclusion

NCOSS strongly supports improving the training delivered to frontline service staff, and note that the behaviour of service staff can have a significant impact on the experiences of people with disability using public transport. For example, some people report being reluctant to catch buses as they are concerned that the bus driver will begin driving before they are seated. NCOSS therefore welcomes the initiatives outlined under this strategy.

There is also a need to increase awareness and understanding of the experiences of people with disability amongst all transport customers. To this end, advertising campaigns should be developed in consultation with the disability sector.

Recommendation 18: Advertising campaigns should be developed in consultation with the disability sector to raise awareness and understanding of the experiences of people with disability amongst all transport customers.

Practical measures to improve the journey experience

People who rely on lifts in order to access the public transport network report that it is difficult to access accurate and up-to-date information about whether lifts are in working order. Real-time information on lifts that are closed for maintenance or repair should be incorporated into the 131 500 transport service.

Recommendation 19: Real-time information on lifts that are closed for maintenance or repair should be incorporated into the 131 500 transport service.

Service disruptions

The DAP does not currently address service disruptions. Where these occur, replacement services should be accessible to people with disability, or alternative services provided.

Recommendation 20: Where service disruptions occur, replacement services should be accessible to people with disability, or alternative services provided.

Tailored journey planning

Many people with disability find it hard to access the information they need in order to make a journey. In particular, some bus operators do not provide timetables that provide information on accessible services, or do not reliably run accessible buses according to the published timetable. This is an issue in both Metropolitan Sydney and in rural and regional areas, which are not currently covered by the 131 500 service.

Recommendation 21: Transport for NSW should work with transport operators across NSW to publish relevant information on accessible services and introduce accountability measures to ensure operators run according to their published timetables.

Fully integrated ticketing system

NCOSS is concerned that people with intellectual disability or other cognitive impairments will be unfairly disadvantaged by a system that requires them to tag on

and tag off. In developing policies for pricing and penalties that will apply within an integrated ticketing system, Transport for NSW should take the experiences of these people into account.

Recommendation 22: In developing integrated ticketing system pricing and penalty policies, Transport for NSW should ensure that people with intellectual disability or other cognitive impairments are not unfairly disadvantaged.

4. Enhancing customer insight and engagement of people with disabilities or mobility constraints

As noted above, NCOSS welcomes the initiatives in this plan that will improve the engagement of people with disability.

In order to increase insight into the travel needs of customers with disability it will also be necessary to engage with customers who do not currently use the public transport system in order to better understand barriers to access. This may require working incorporating relevant questions into other data collection exercises relating to disability and/or transport, or working in partnership with service providers to conduct targeted qualitative surveys.

See Recommendation 5.

5. Supporting accessibility through partnerships

A partnership approach is critical to achieving whole of journey accessibility. For many of the partnerships described in this section, however, it is not clear who will take responsibility for implementing the identified actions and for ensuring the outcomes of the partnership will benefit people with disability. Partnerships, particularly those between both state and local government agencies, should be supported by the delegation of sufficient power and the allocation of sufficient resources.

Recommendation 23: Partnerships should be supported by the delegation of sufficient power and the allocation of sufficient resources

6. Increasing employment opportunities for people with disabilities in Transport for NSW agencies

NCOSS supports Transport for NSW's commitment to increasing employment opportunities for people with disability. We understand that some agencies within Transport for NSW currently exceed the target of 1.5% employment of people with disability requiring a workplace adjustment. To ensure greater accountability, current disability employment levels within Transport for NSW should be published as a baseline measure within the DAP, and should be reported on annually.

Recommendation 24: Current disability employment levels within Transport for NSW should be published as a baseline measure within the DAP.

We note that the actions within the DAP align with the EmployABILITY strategy, which sets out an approach designed to increase employment by people with disability within the public sector from 2010 to 2013. Following review of this strategy in 2013, the DAP should be updated to incorporate changes as necessary and to adopt new targets (see Recommendation 29).

Delivery, Monitoring and Evaluation

In its current form, the DAP does not provide adequate information to ensure transparency and accountability: nor have rigorous monitoring and evaluation methods been developed. These aspects of the plan should be strengthened to ensure the plan results in real progress for people with disability.

Accountability

It is not clear who is accountable for which actions in the plan. The responsible agency or division should be specified in order to ensure ownership over each action and to improve accountability.

Recommendation 25: The agency or division responsible for each action should be specified.

Reporting

We recommend that a template for annual reporting is developed that will provide updates on progress against each of the recommended actions. Where relevant, baseline measures should be published to provide transparency and greater accountability.

Recommendation 26: A template for annual reporting should be developed that will provide updates on progress against each of the recommended actions.

Recommendation 27: Baseline measures should be published to provide transparency and greater accountability.

Measuring outcomes

We are concerned that many of the indicators measure outputs rather than outcomes. For example, the number of people who have received training does not provide a good understanding of whether or not this training has been successful in improving the journey experience of people with disability.

Recommendation 28: Where possible, indicators should be reframed to measure outcomes rather than outputs.

Review

As noted earlier in this submission, the DAP will need to be updated to incorporate changes made to other relevant strategies and policies, particularly the review of the Disability Standards for Accessible Public Transport.

In addition, many of the actions are not specific, and rely on further research, discussion or review before future actions can be identified.

Provisions should be made to update the plan as required, in consultation with the Accessible Transport Advisory Committee, with a comprehensive review in five years.

Recommendation 29: Provisions should be made to update the plan as required, in consultation with the Accessible Transport Advisory Committee, with a comprehensive review in five years.