



**Bus and Coach Operators
Guidelines for
The Disability Discrimination Act**

CHAIRMAN'S FORWARD

The Bus Industry Confederation is proud to present this Guide for bus and coach operators and bus bodybuilders. The Guide will assist them to meet the requirements of the Disability Discrimination Act which came into effect in October 2002.

I would like to thank Darryl Mellish and Keith Watson of BCANSW for their dedication in carrying out the difficult task of preparing these Guidelines.

The publication will be updated as required to provide for example, information on technical issues still to be resolved, reviewed interpretations of standards and the outcomes of the 5 year reviews of the standards as required under the ACT.

Please remember, this Guide is exactly that, a Guide. You will need to obtain your own advice on matters of interpretation or contact the relevant authorities as outlined in the Guide.



Stephen Lucas

Yours sincerely

Stephen Lucas
BIC Chairman

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This book has been produced for the Bus Industry Confederation by PSA. For further information contact 1800 649 578.



Executive Summary

Purpose

To provide accessible transport and comply with the Disability Discrimination Act and its Disability Transport standards.

How does it work?

There are no compliance police. Enforcement of standards occurs only after there is an unresolved complaint.

What is meant by a disability?

People with disabilities are not limited to people in wheelchairs. It can include people with virtually any disability, e.g. sight, hearing, intellectual, etc.

Does it apply to me?

If you operate route services or sell seats on a per seat basis — Yes.

There are exemptions for school bus operators.

A position in relation to Charter operations remains slightly unclear.

If you have premises that the public visit in relation to the public transport service, these must also comply.

When did it start?

23 October 2002

How long have I got to comply?

New buses, coaches, premises or infrastructure must comply if put into service from 23 October 2002.

There are requirements to make certain aspects (like information provision and lighting) of buses, coaches, premises and infrastructure 100% compliant by either 31-December 2007 or 2012.

Other aspects (like ramps) have a phased implementation over a 20-year period.

What should I do first?

If you have any vehicles on order, which must be accessible, check with your supplier to ensure that, they comply.

What's next?

Review your existing fleet and fleet replacement plan to ensure that targets will be met.

Review existing premises, infrastructure and information to determine whether or not they meet the standards.

Action Planning

Develop an Action Plan to meet the standards. An Action Plan should be presented in a clear and accessible format. An example Action Plan is shown in the Appendix.

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Introduction

The Standards referred to in this Guide are the Disability Standards for Accessible Public Transport. These are prescribed under section 31 of the Disability Discrimination Act (DDA). The Standards in turn refer frequently to Australian Standards AS1428.1 and AS1428.2

Why have standards?

The purpose of the legislation is explained in a joint media release by the Attorney-General and the Deputy Prime Minister on 21 August 2002.

ON TRACK FOR ACCESSIBLE PUBLIC TRANSPORT

New Transport Standards will make public transport more accessible for people with a disability, the elderly and parents with infants in prams.

Attorney-General Daryl Williams this week tabled in Parliament the Disability Standards for Accessible Public Transport and accompanying Guidelines under the Disability Discrimination Act 1992.

For the first time, the Transport Standards set out formal requirements for accessibility to public transport in Australia.

These include access paths, manoeuvring areas, ramps and boarding devices, allocated spaces, handrails, doorways, controls, symbols and signs, the payment of fares and the provision of information.

Providers and operators of public transport, infrastructure and premises must meet these requirements for all new items coming into service and will have a staggered compliance timeframe for upgrading equipment.

Mr Williams and Deputy Prime Minister and Minister for Transport and Regional Services John Anderson today congratulated the disability sector, transport industry and all levels of Government for their sustained commitment to the goal of public transport accessibility.

“These standards are an excellent example of disability, government and industry groups working together to eliminate discrimination,” the Ministers said.

“They will help to promote greater independence and a correspondingly better quality of life for people who have previously found it difficult to use public transport.”

The Standards take effect on 15 October 2002¹ and will be reviewed within five years by the Minister for Transport, in consultation with the Attorney-General.

The Disability Discrimination Act was recently amended to allow the Human Rights and Equal Opportunity Commission to grant temporary exemptions from Transport Standards where appropriate.

In considering exemptions, the Commission must take into account advice from the National Transport Secretariat.

Who does the legislation apply to?

The DDA Standards has the following definition:

1.23 Public transport service²

- (1) A *public transport service* is an enterprise that conveys members of the public by land, water or air.
- (2) A *public transport service* includes:
 - (a) community transport conveyances that are funded or subsidised by charity or public money and that offer services to the public; and
 - (b) foreign aircraft and vessels that carry passengers to, from, or in Australia and that offer services to the public.
- (3) A public transport service does not include a service that provides adventure travel (for example, white water rafting, ballooning or amusement park rides), except to the extent that the service operates to move the public from one location to another distant location.

What does this mean in practice?

Route services being performed by either buses or coaches must be performed by accessible vehicles within the timeframe specified.

Dedicated school buses are excluded.³

Coach tours which are being offered generally to the public, i.e. sold per seat, must be performed by accessible vehicles within the timeframe specified.

Charters which involve contracting with a group to provide a transport service are not covered by the Standards but are covered by the DDA. If that group sells tickets to the public, an accessible vehicle would be required to perform the charter.

Purpose of the Guide

The aim of this Guide is to provide assistance in understanding the requirements set out in the Disability Standards for Accessible Public Transport.

It aims to provide practical advice to operators on how to meet the requirements of the Standards.

It is not a requirement of the DDA that service providers prepare and implement Action Plans but it is desirable as this will ensure that obligations are met on time and that required changes can be implemented in a structured way. For further details on the preparation of Action Plans, see the section below.

The Guide is based on the relevant legislation and other appropriate source material.

For those requiring more detailed information, a list of references is located at the end of the document.

New Items

After 23 October 2002 operators and providers must comply with the specified sections of the Standards for

- new premises, infrastructure and conveyances brought into use for public transport service.⁴ For example, if you are buying a new bus for route service, it must be accessible even if you exceed the accessibility targets.
- new or revised ancillary services provided as part of the public transport operation and to
- new or updated information provided to the public⁵
- substantially refurbished premises
- replacement or additional equipment

Future Changes to Legislation

This Guide was written in June 2003. The Standards are subject to review on at least a five yearly basis and it is possible that they may be updated more frequently.

A Technical Review Report on Draft Disability Standards for Accessible Public Transport has been prepared. On balance it is likely that the changes recommended will be accepted by the Attorney General and be incorporated in the Standards in the first half of 2003. This Guide has therefore been prepared on the basis of the Standards which are effective from 23 October 2002 as amended by the changes recommended by the Technical Review.

The items which are not yet part of the Standards will be shown in this font in this colour used in this paragraph.

Structure of the Guide

The Guide will deal in turn with all of the requirements and deadlines in relation to:-

- buses and coaches
- premises and infrastructure
- bus stops

There are provisions in the legislation for an operator to obtain relief from the Disability Standards for Accessible Public Transport by providing equivalent access via direct assistance.⁶

There are further provisions for operators to claim 'unjustifiable hardship' as a defence against a claim for unlawful discrimination.⁷

Both of these provisions are explained later in the Guide.

There are also sections giving answers to Commonly Asked Questions, Definitions and References.

1. Due to a proposal by the Australian Democrats to amend the Standards which was not proceeded with, the starting date for operation of the standards was delayed to 23 October 2002.
2. Standards Part 1.23
3. A dedicated school bus is a bus providing a service that operates to transport primary or secondary students to or from school or for other school purposes, i.e. school charter. Standard 1.13
4. Standards Part 33.1
5. Standards Part 32
6. Standards Part 33.4
7. Standards Part 33.7

Action Planning for The Bus & Coach Industry

Meeting all of the requirements of the DDA is scheduled to take up to 20 years. For existing items, some requirements must be met completely within 5 or 10 years and those with longer implementation periods have interim targets to be met. Therefore, planning must start now.

Why have an Action Plan?

An Action Plan can assist a bus operator to:

- Eliminate discrimination in an active way;
- Improve services to existing passengers;
- Enhance an operator's image;
- Reduce the likelihood of complaints being made under the Disability Discrimination Act (DDA);
- Increase the likelihood of being able to successfully defend complaints;
- Increase the likelihood of avoiding costly legal action;
- Allow for a planned and managed change to an operator's services; and
- Open up new markets and attract new consumers.

What is an Action Plan?

As advised in Section 61 of the Commonwealth's DDA a Disability Action Plan for service providers must include:

- A review of current practices to determine ways in which these might restrict the access of users or potential users who have disabilities;
- The formulation of policies and programs to remove identified restrictive practices/barriers to access;
- Goals and targets for these policies and programs;
- Evaluation strategies;
- The allocation of responsibility for implementation; and
- Communication strategies.

In addition, an Action Plan can only be deemed effective if it:

- Addresses the rights of all people with disabilities;
- Eliminates discrimination in the provision of mainstream services rather than establishing separate or parallel 'special' services;
- Ensures equal access for people with disabilities rather than simply improving or enhancing access;
- Addresses all barriers/restrictive practices including physical, information, communication and attitudinal barriers;
- Shows clear evidence of consultation with stakeholders;
- Provides for continuing consultation, evaluation and review; and
- Is being implemented.

The Process of Preparing an Action Plan

An Action Plan for a transport service provider should cover the following five areas:

- Information about services;
- Physical access to services and infrastructure;
- Complaints procedures;
- Staff training and employment practices; and
- Promoting positive community attitudes.

For each of these areas, a transport service provider should do the following:

- Identify the barriers to accessibility for passengers and staff with disabilities;
- Identify strategies to remove those barriers;
- For each strategy, identify the resources needed to accomplish it (including human, financial or time

resources);

- For each strategy, identify the person/people/organisation positions responsible for implementation of the strategy; and
- For each strategy, identify the timeframe for completion.

As part of the process of preparing an Action Plan, a transport service provider should ensure that consultation with the disability community is undertaken. For instance, it may be possible to include people with disabilities and their peak organisations to assist in identifying barriers and assisting in the formulation of strategies. Inclusion of people with disabilities in the Action Planning process should create a more favourable climate for the Action Plan's implementation.

An Action Plan should also include an effective evaluation, monitoring and review strategy so that the Plan remains a 'live' document and is responsive to changing circumstances and the completion of strategies. Including the disability community in the evaluation monitoring and review process may provide additional information about a provider's strategies and assist in improving future strategies.

Action Planning examples

An Action Plan should be presented in a clear and accessible format. Attached at Appendix 1 are examples showing how each of an Action Plan's five areas might be addressed.

The size and complexity of an Action Plan varies with the size of an organisation and the complexity of its services. The Human Rights and Equal Opportunities Commission has indicated that, while a large organisation 'may have an Action Plan of 20 or 30 pages, a small business may well be able to address all access issues in 2 pages'.

An Action Plan should provide for periodic updates and should indicate for what period the strategies are in place for. For example for NSW Government agencies Action Plans should be set for a three-year time period.

The exemplified format that appears as Appendix 1 is not restrictive. For instance, a transport service provider may wish to add an 'Achievements' column to the tables to show how the organisation is progressing against the timeframe/target.

Action Planning Checklist

An Action Planning checklist follows after the examples as Appendix 2. This will enable operators to check their progress in the formulation of their Action Plans.

Bus and Coach Requirements

What is a coach?

Unfortunately there is no definition in the legislation. Common usage indicates that a coach is a vehicle fitted with seats greater than 1 metre high. ADR 68 in turn specifies that lap-sash seat belts must be fitted.⁸

Buses and coaches sometimes have different requirements in certain areas. These differences will be explained in the relevant section.

In calculating the total quantity of services which is used to calculate the degree of compliance, the Human Rights & Equal Opportunity Commission (HREOC) has advised that the number of trips is the appropriate measure for bus operators. Therefore, provided accessible buses perform the required percentage of accessible trips by the target dates the operator will be fulfilling the requirements of the legislation even if the percentage of accessible vehicles does not meet the target.

A summary of the compliance timetable for buses and coaches is set out in the table below.

Compliance Targets for Buses and Coaches					
Item	Standards Reference Number	Compliance %			
		31/12/07	31/12/12	31/12/17	31/12/22
Symbols	16	100			
Signs	17	100			
Alarms	19	100			
Lighting	20	100			
Hearing augmentation	26	100			
Information	27	100			
Booked services (Coaches)	28	100			
Food and drink services	29	100			
Belongings — (Coaches)	30	100			
Priority seating — (Buses)	31	100			
Surfaces	10		100		
Handrails and grabrails	11		100		
Payment of fares	25		100		
Access paths — (Buses)	2	25	55	Bus 80	100
Manoeuvring areas	3	25	55	Coach 90/Bus 80	100
Ramps	6	25	55	Coach 90/Bus 80	100
Boarding devices	8	25	55	Coach 90/Bus 80	100
Allocated space	9	25	55	Coach 90/Bus 80	100
Doorways and doors	12	25	55	Coach 90/Bus 80	100
Stairs	14	25	55	Coach 90/Bus 80	100
Toilets (or stops) — (Coaches)	15	25	55	90	100
Controls	21	25	55	Coach 90/Bus 80	100

BUS AND COACH REQUIREMENTS

Many of the accessibility requirements for buses and coaches can only be met by building new vehicles. It is not practical to retrofit old vehicles to comply with all of the requirements of the DDA. Apart from the increased cost of accessible vehicles, their reduced carrying capacity and access restrictions due to low road clearance, meeting this target should not normally be a problem for most operators.

As an example the NSW Passenger Transport Act 1990 legislation requires buses to have a maximum average fleet age of 12 years.⁹ If this maximum was used, a new vehicle would be disposed of after 24 years. The DDA requirements are based on a 20 year timetable. It is normal practice to work newer vehicles harder than old ones. Therefore, it is quite likely that even if the 24 year cycle was maintained, the 5, 10 and 15 year targets could be met with no acceleration in the vehicle replacement plan. Obviously, at the 20 year target date, all vehicles must be DDA compliant. To assist in planning, a spreadsheet has been developed which will readily show compliance levels of the current fleet and allow testing of fleet replacement scenarios.¹⁰

As mentioned above, dedicated school buses do not have to meet DDA requirements.

Fleets with dedicated school buses will have fewer problems in complying since non-compliant route service buses could be transferred to school bus operations.

When purchasing a new vehicle today, it must meet all requirements of the Standards.

It would be reasonable for operators to rely on the expertise of vehicle vendors to ensure that the vehicle complies with the Standards. Operators should advise the vendor prior to purchase of the requirement for the vehicle to be DDA compliant. Confirmation of compliance should be a term of the purchase contract

Some other requirements require 100% compliance in five or ten years and this may involve modifications to existing buses and coaches. These are explained below.

31 December 2007 100% Compliance Targets

Symbols ¹¹

International symbols for accessibility and deafness¹² must be used to identify accessible boarding points and where in the vehicle hearing augmentation systems work.

Symbols specified in AS2899.1, General Information Signs must also be used. Signs which may be applicable include Drinking Water on Tap, Litter Bin, Smoking Prohibited and Toilet.

Signs with international symbols for accessibility must be clearly visible on the front of accessible buses (but not coaches).

The symbol must also appear outside accessible doors, accompanied by a numeral indicating the number of allocated spaces provided by the bus.

Some examples of on-bus accessibility signage are shown below:



Signs 13

Requirements regarding signs apply to both buses and coaches.

Size

Lettering on signs on the inside of buses and coaches must comply with the following size standard:

Height of Letters for Varying Viewing Distances	
Required Viewing Distance Metres	Minimum Height of Letters mm
2	6
4	12
6	20
8	25

Illumination

Signs in buses and coaches are not normally illuminated but if they are, a lighting level of 200-300 lux is required and it must be placed so that unwanted reflections do not occur on the sign.

A high level of contrast is required between the letters and the background of signs. Black lettering on a white background provides maximum contrast.

Destination Signs

If used, destination signs must be placed above the windscreen.

There is no size specified for destination signs. However the Australian Standard requires lettering at least 150 mm high if a sign is to be read at a distance of 50 metres.

Industry practice for a number of years has been that the route number is not less than 200 mm in height and lettering is white or yellow on a black background.

Alarms 14

Buses and coaches do not have emergency warning systems for passengers. No obligations therefore arise under this clause.

The Technical Review Committee has recommended that the current clause which says,

“When a fire alarm sounds, exit signs must sound audible signals complying with AS2220 (1989).” with the words

“In the event of an emergency, provision must be made for people with vision impairment to locate the exit path.”

Lighting 15

The Standards require that lighting should be at least 150 lux (lumens per square metre) at the entrance and at the point where a passenger pays his/her fare.

Testing conducted by the BCA NSW indicates that it is not likely to be possible to meet the lighting level required

BUS AND COACH REQUIREMENTS

by the Standards. There is a provision that “Internal lighting may be dimmed as required to avoid reflection interfering with an operator’s vision.” – Clause 20.3.

The BIC have concerns that even if it were possible to achieve the 150 lux standard, it is doubtful that the eyes of drivers could adjust quickly enough after lights are dimmed to maintain normal operations.

The Standards prior to the Technical Review Committee Recommendations do not have any requirements regarding lighting of buses and coaches.

Hearing Augmentation 16

The requirement to install hearing augmentation systems only arises if the bus or coach has a public address system.

At least 10 percent of the space within the vehicle shall be serviced by such a system.

The availability of this system must be indicated by a sign at the doorway and where the system does not cover the whole vehicle, signs must define the area serviced.

The Standards prior to the Technical Review Committee Recommendations do not have any requirements regarding hearing augmentation in buses and coaches.

Information 17

General information about transport services should be available on the bus or coach. This should include information about fares, concessions, timetables and accessible services.

Timetables and Other Transport Information

Large format timetables would not normally be carried on the bus but drivers would be expected to provide oral information about timetables and routes.

The information must be available from the operator or his agent. The information must be printed using at least 18 point san serif characters like Helvetica or Arial.

The text must be in black on a light background.

Information about Location

The Standards state that “All passengers must be given the same level of access to information on their whereabouts during a public transport journey.”

The main difficulty relates to providing location information to vision-impaired people. Ordinarily, passengers determine where they should get off a bus by visually recognising the destination.

It is normal practice for passengers who are not familiar with a destination to ask the driver to let them know when they have arrived at their destination. This would satisfy the requirements.

Alternatively, the driver could announce each destination over the public address system on the bus.

Ideally, an automated system which both displays and announces the current location could be provided.

Booked Services 18

The Booked Services provisions only apply to coaches.

Operators of coaches who operate a booked service must be able to accommodate passengers with a disability by 31 December 2007.

Where bookings are not required, the introduction of accessible coaches can be implemented over a 20 year period.

Advance Notice

Operators may request advance notice of a requirement for accessible travel but this period can't exceed the period of notice required for other passengers.

If a passenger identifies a particular requirement in making a booking, the operator should inform the passenger fully of any relevant service options available.

Location of Carers, Assistants and Service Animals

On booked services, operators must locate carers, assistants or service animals with the passenger with whom they are travelling.

In case



the of

carers or assistants, this would normally be in an adjoining seat.

If a passenger is travelling with a service animal, the animal must be able to accompany the passenger at all times and to travel without encroaching onto an access path.

Accessible seats to be available for passengers with disabilities

Accessible seats must be kept for passengers with disabilities.

Operators must allocate unbooked accessible seats to other passengers only after all other standard seats are filled.

If all seats have been booked, there is no requirement to give priority to a disabled passenger.

8. AS1428.1 does not apply to Route Service Omnibuses, or Omnibuses with less than 17 Seats including the driver and crew, or

vehicles in which all passenger 'Seats' have a 'Reference Height' of less than 1.0 metre."

9. Passenger Transport Act 1990

10. Bus Fleet Average Age and DDA Rev 9.xls

11. Standards Part 16

12. AS1428.1 Clause 14.3

13. Standards Part 17

14. Standards Part 19

15. Standards Part 21

16. Standards Part 26

17. Standards Part 27

18. Standards Part 28

19. Standards Part 29

20. Standards Part 30

21. Standards Part 31

22. Standards Part 32

23. Standards Part 33

24. Standards Part 34

Food and Drink Services 19

Operators and providers must ensure that any food or drink service that is provided as part of a public transport service is equally available to all passengers.

Typically the only such service in a coach might be the provision of chilled water.

Belongings 20

31 December 2012 100% Compliance Targets

Surfaces²²

Floors of buses and coaches must be slip resistant.

The Standard requires compliance with AS 1428.1 Supplement 1 (1993) which provided criteria for the selection of floor surfaces. This has been withdrawn. Information about floor surfaces is available in AS 4586:1999 Slip resistance classification of new pedestrian surface materials.

Detailed requirements for carpet can be found in AS 1428.2 Clause 9. This relates to security of attachment, firmness, type of carpet, pile height and edge trimming.

ADR 58.11 requires that "Floors of omnibuses shall be finished *and maintained* with a skid-resistant surface ..."

Therefore, in practice the DDA does not impose any additional requirements with respect to buses and coaches.

Handrails and Grabrails²³

A **handrail** is a rail used to assist in continuous movement, like a rail mounted on the ceiling and going down the length of the bus.

A **grabrail** is to provide steadying or stabilizing assistance. They may be vertical like the rails which go from floor to ceiling of a bus or may be mounted on the top of a seat and go to the ceiling. Other examples of grabrails are those in wheelchair spaces.

ADR 58.10 requires that "Omnibuses shall be provided with a suitable number of hand straps, hand rails or hand grips for the convenience and safety of passengers."

The main provisions of the Standards are:

- a grabrail or handrail must be provided where passengers are required to pay fares
- grabrails must be provided in allocated spaces
- handrails are to be installed where there are steps
- handrails and grabrails must comply with Australian Standards

AS 1428.1 Clause 6 and AS 1428.2 Clause 10 outline the requirements in relation to handrails and grabrails. The key requirements are:

- they shall not rotate in their fittings
- the cross section of handrails shall be circular and between 30 and 50 mm
- grabrails shall be between 30 and 40 mm outside diameter (not necessarily circular)
- clearance between the rail and an obstruction shall be not less than 50 mm

Payment of Fares²⁴

Fare payment and ticket validation systems

Clause 25.2 (2) states:

- For passengers who have difficulties with standard fare payment systems, operators and providers must offer a form of payment that meets equivalent access principles.

Note:-See sections 33.3 to 33.5 in relation to equivalent access.

In most cases compliance with this requirement will not be a problem as ticketing systems are usually fairly basic and are operated by the driver.

BUS & COACH REQUIREMENTS

Vending machines

Vending machines are rarely if ever used on buses but if they are they must comply with AS 1428.2 which deals with height, controls and illumination of vending machines.

31 December 2017 100% Compliance targets

There are no 100% compliance targets for bus operators for this date. However, 80% of services and 90% of premises and infrastructure compliance targets must be met.

31 December 2022 100% Compliance targets

In addition to the requirement to have all bus and coach services compliant by this time, the Standards also require that all infrastructure be completely compliant (*see Premises and Infrastructure and Bus Stops*).

-
- 22. Standards Part 10
 - 23. Standards Part 11
 - 24. Standards Part 25

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Premises and Infrastructure Requirements

31 December 2007 100% Compliance Targets

Compliance Targets for Premises and Infrastructure					
Item	Standards Reference Number	Compliance %			
		31/12/07	31/12/12	31/12/17	31/12/22
Access paths	2	25	55	90	100
Manoeuvring areas	3	25	55	90	100
Passing Areas	4	25	55	90	100
Resting points	5	25	55	90	100
Ramps	6	25	55	90	100
Boarding	8	25	55	90	100
Allocated space	9	25	55	90	100
Doorways and doors	12	25	55	90	100
Lifts	13	25	55	90	100
Stairs	14	25	55	90	100
Toilets	15	25	55	90	100
Tactile ground surface indicators – TGSi	18	25	55	90	100
Controls	21	25	55	90	100
Street furniture	23	25	55	90	100

Bus Stops: In addition to the items listed above, symbols, signs, lighting, information, surfaces, handrails and grabrails may be installed in accordance with the above timetable rather than the timetable in relation to other items of infrastructure.

For further details see the Bus Stop section.

Waiting Areas ²⁵

Minimum number of seats to be provided

If a waiting area is provided, a minimum of 2 seats or 5% of the seats must be identified as available for passengers with disabilities if required.

Minimum number of allocated spaces to be provided

If a waiting area is provided, a minimum of 2 allocated spaces or 5% of the area must be available for passengers with disabilities if required.

Symbols 26

The international symbols for accessibility and deafness must be used to identify an access path and which facilities and boarding points are accessible.

The illustrations and symbols prescribed in AS2899.1 (1986) must be used if applicable.

The symbol for accessibility must incorporate directional arrows and words or, if possible, pictograms, to show passengers the way to accessible facilities such as toilets.

Some examples are shown below:



Signs must be a greater than or equal to the following sizes.

Viewing Distance Metres	Size of Symbol mm
< 7	60 x 60
< 7 < 18	110 x 110
> 18	200 x 200

Signs 27

Size

Lettering on signs on the inside of buses must comply with the following size standard:

Height of Letters for Varying Viewing Distances	
Required Viewing Distance Metres	Minimum Height of Letters mm
2	6
4	12
6	20
8	25

A Helvetica Medium typeface is preferred.

Illumination

Signs in buses are not normally illuminated but if they are, a lighting level of 200-300 lux is required and it must be placed so that unwanted reflections do not occur on the sign.

A high level of contrast is required between the letters and the background of signs. Black lettering on a white background provides maximum contrast.

Location

Wherever possible signs should be placed between 1,400 mm – 1,600 mm above the floor.

When this is not possible the sign may be placed not less than 1,000 mm from the floor.

Where the design of the bus prevents strict compliance with these measurements, signs must be placed above the head height of passengers, whether they are sitting or standing.

Electronic Notices

Words or numbers must be displayed for at least 10 seconds.

Alarms²⁸

If installed, emergency warning systems must comply with AS1428.2.

In the event of an emergency, provision must be made for people with vision impairment to locate the exit path. This replaced the previous clause which stated “When a fire alarm sounds, exit signs must sound audible signals complying with AS2220 (1989).”

Lighting²⁹

Lighting must be at or above the following levels:

- | | |
|---|---------|
| • Entrances, Passageways & Walkways, Stairs and Ramps | 150 lux |
| • Toilets and Locker Rooms | 200 lux |
| • Counter Tops | 250 lux |

Lighting shall be uniform.

Furniture and Fitments³⁰

Table, benches, counters, etc.

Ideally the height should be adjustable between 700 mm and 850 mm.

The unobstructed width beneath the table shall be at least 800 mm.

The counter shall be at least 900 mm long.

Hearing Augmentation³¹

The requirement for a hearing augmentation system only applies if a public address system is installed.

At least 10 percent of the space must be serviced by such a system.

The availability of this system must be indicated by a sign at the doorway and where the system does not cover the whole space, signs must define the area serviced.

Information 32

Access to information about transport services

General information about transport services must be accessible to all passengers.

This would include information about fares, concessions, timetables and accessible services.

Information should be provided in as many formats as is economically feasible. Where requests are made for information in a format that has not been provided for like TTY³³, the legislation provides that equivalent access must be given by direct assistance.

Size and format of printing

The legislation is very clear about requirements for printed material.

- (1) Large print format type size must be at least 18 point sans serif characters.³⁴
- (2) Copy must be black on a light background.

This does not mean that all printed material has to comply, but accessible versions must be available which do comply.

Accessible versions do not have to be available at all distribution points. For example, timetables meeting the above requirements may only be available from the depot and not on the bus or from other timetable outlets like motels.

Wherever feasible, information at bus stop stops should be in accessible format but this may not always be possible due to the amount of information to be displayed.

Sources of information about good transport information design

Information about signage should be sought from the relevant State Transport Authority.

Some useful publications to assist are a Transport NSW publication — *Best Practice Guidelines for NSW Public Transport Signage and Information Displays* and a *Practical Guide to Bus Service Information*, published by the NSW Ageing and Disability Department in March 2001.

The design of Internet based information can be checked by using specialised software like *Bobby*.

Food and Drink Services 37

Operators and providers must ensure that any food or drink service that is provided as part of a public transport service is equally available to all passengers.

The distance around accessible tables in food and drink service areas must comply with **AS1428.2 (1992) Clause 24.1.7**. This requires that there must be at least 1,620 mm from the edge of the table that a wheelchair is facing and the back of the chair behind the wheelchair, when the chair is in a position where someone would be sitting in it. AS1428.2 provides a useful diagram which clarifies this requirement.

25. Standards Part 7
26. Standards Part 16
27. Standards Part 17
28. Standards Part 19
29. Standards Part 20
30. Standards Part 22
31. Standards Part 26
32. Standards Part 27
33. TTY (teletypewriter or text telephone), also known as TDD

(telecommunication device for the deaf) is a communication device used by individuals who cannot use standard voice phones. These individuals are usually deaf or hard of hearing; they may have a speech impediment or other communication disability.

34. Arial or Helvetica would be examples of a sans serif type face.
35. http://www.transport.nsw.gov.au/pubs_legal/signage_guide.pdf
36. <http://bobby.watchfire.com/bobby/html/en/about.jsp>

31 December 2012 100% Compliance Targets

Surfaces ³⁸

The Disability Standards require access paths to be stable and level across their width and slip resistant.

Detailed requirements for abutment of surfaces, carpet and gratings can be found in AS 1428.2 Clause 9.

The Standard requires compliance with AS 1428.1 Supplement 1 (1993) which provided criteria for the selection of floor surfaces. This has been withdrawn. Information about floor surfaces is available in AS 4586:1999 Slip resistance classification of new pedestrian surface materials.

Handrails and Grabrails ³⁹

A handrail is a rail used to assist in continuous movement along a walkway.

A grabrail is to provide steadying or stabilizing assistance.

AS 1428.1 Clause 6 and AS 1428.2 Clause 10 outline extensive requirements in relation to handrails and grabrails. The key requirements are:

- they shall not rotate in their fittings
- the cross section of handrails shall be circular and between 30 and 50 mm
- grabrails shall be between 30 and 40 mm outside diameter (not necessarily circular)
- clearance between the rail and an obstruction shall be not less than 50 mm

Gateways ⁴⁰

Gateways and checkouts, such as ticket barriers, must comply with AS1428.2 (1992) Clause 28, Gateways and checkouts.

It is unlikely that this clause will affect bus and coach operators.

Payment of Fares ⁴¹

There are requirements in the Standards about the design of vending machines but these are currently unlikely to be used by bus and coach operators.

31 December 2017 100% Compliance Targets

There are no 100% compliance targets for Premises and Infrastructure by this date. However, all premises and infrastructure requirements not already made 100% compliant should be 90% compliant by this date.

31 December 2022 100% Compliance Targets

The following items should be 100% compliant by the above target date. (See below for access paths, manoeuvring areas, passing areas, resting points, ramps etc).

Access Paths ⁴²

Unhindered passage

An access path that allows unhindered passage must be provided along a walkway, ramp or landing.

An access path must comply with **AS1428.2 (1992) Clause 8.1**.

The minimum width required is 1200 mm.

Landings must be located at the top and bottom and where the gradient exceeds 1 in 19, and the length of the ramp exceeds 6 m, landings must be provided at varying distances along the ramp depending upon the gradient.

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The advertisement features a large image of a bus with its wheelchair ramp extended. Below this are two smaller images of a yellow city bus (CB60) and a white midibus (CB30). The background is dark blue with a white wheelchair icon. The text is in white and orange.

Continuous accessibility

An access path must comply with **AS1428.2 (1992) Clause 7**.

This provides that all accessible areas within the site and leading to the site from transportation stops must have accessible paths connecting them.

Poles and obstacles, etc

Poles, columns, stanchions, bollards and fixtures must not project into an access path.

Obstacles that abut an access path must have a luminance contrast with a background of not less than 30%.

Manoeuvring Area ⁴³

The preferred dimensions are 2450 mm in the direction of travel and 1740 mm wide. The minimum dimensions are 2250 mm x 1540 mm.

Passing Areas ⁴⁴

Minimum width

A passing area must have a minimum width of 1800-mm (AS1428.2 (1992) Clause-6.5-(a), Passing space for wheelchairs).

Two-way access paths

A passing area must be provided at least every 6 metres along any two-way access path that is less than 1800-mm wide (**AS1428.2 (1992) Clause-6.5-(b)**, Passing space for wheelchairs and **Figure 3**).

Resting Points ⁴⁵

When resting points must be provided

There must be resting points for passengers along an access path if the walking distance between facilities or services exceeds 60-metres (**AS1428.2 (1992) Note to Clause 7**, Continuous accessible path of travel).

A resting point must provide seats (**AS1428.2 (1992) Clause 27.1(a)**, Street Furniture).

Ramps ⁴⁶

The minimum width required is 1200 mm.

Landings must be located at the top and bottom and where the gradient exceeds 1 in 19, and the length of the ramp exceeds 6 m. Landings must be provided at varying distances along the ramp depending upon the gradient.

Boarding Points and Kerbs ⁴⁷

Operators and providers may assume that passengers will board at a point that has a firm and level surface to which a boarding device can be deployed.

If a kerb is installed, it must be at least 150-mm higher than the road surface.

Allocated Space ⁴⁸

The minimum allocated space for a single wheelchair or similar mobility aid is 800-mm by 1300-mm.

Doorways and Doors 49

Doors on access paths

Any doors along an access path must not present a barrier to independent passenger travel.

Direct assistance may be provided through security check points.

Automatic doors are preferred along an access path.

Compliance with Australian Standard— premises and infrastructure

Doorways and doors must comply with **AS1428.2 (1992) Clause 11** (except **Clause 11.5.2**).

Clause 11 of AS1428.2 has numerous provisions about the design of doorways and doors. AS1428.2 in turn requires compliance with AS1428.1. Clause 7 of AS1428.1 also prescribes numerous requirements.

Weight activated doors and sensors

A pressure pad of a weight activated door must be sensitive enough to detect a 15-kg service animal.

Any other type of sensor on an access path must be able to detect movement between ground level and 500-mm above the access path.

Lifts 50

Compliance with Australian Standard— premises and infrastructure

Lift facilities must comply with **AS1735.12 (1994)**.

Stairs 51

Stairs not to be sole means of access

Stairs must not be the sole means of access.

Compliance with Australian Standards— premises and infrastructure

Stairs must comply with:

- (a) the notes to AS1428.1 (1993) Clause 9.2, Stair Geometry; and
- (b) AS1428.1 (1993) Clause 9.3, Stairway Handrails; and
- (c) AS1428.2 (1992) Clause 13.2, Configuration of steps, Clause-13.3, Warning strip at nosing of steps and Figures 8 and 9.

These requirements are very detailed. If the design of existing stairs did not comply with the standard, it is likely that it may not be practical to comply as this would require a complete reconstruction. It may be feasible to install nosings and compliant handrails in existing buildings and infrastructure at relatively low cost.

Toilets 52

Unisex accessible toilet— premises and infrastructure

If toilets are provided, there must be at least one unisex accessible toilet without airlock that complies with **AS1428.1 (1993) Clause 10**, sanitary facilities.

Location of accessible toilets

Accessible toilets must be in the same location as other toilets.

Comment from Guidelines

The intent of the Disability Standards is that there will be sufficient clear space in an accessible toilet to allow a person using a mobility aid to move between the various fixtures and to exit by moving in a forward direction. However, it is accepted that some larger mobility aids may have to exit by reversing. This implies that solutions, such as two-way swinging doors and remote locking controls, may need to be considered.

*Tactile Ground Surface Indicators – TGSIs*⁵³

Location

Tactile ground surface indicators must be installed on an access path to indicate stairways, ramps, changes of direction, overhead obstructions below a height of 2000-mm, and hazards within a circulation space or adjacent to a path of travel (AS1428.2 (1992) Clause 18.1, Tactile ground surface indicators).

Style and dimensions

The style and dimensions of tactile ground surface indicators must comply with AS1428.4 (1992).

Instalment at accessible bus boarding points

Colour-contrasted tactile indicators must be installed at accessible boarding points at bus stops or in bus zones.

*Controls*⁵⁴

Compliance with Australian Standard—premises and infrastructure

Controls must comply with **AS1428.1 (1993) Clause 11**.

Detailed requirements are outlined in AS1428.1 for

- door handles and hardware
- switches and power points
- water taps

*Street Furniture*⁵⁵

Seats

Seats must comply with **AS1428.2 (1992) Clause 27.2**, Seating in pedestrian areas.

AS1428.2 covers aspects such as seat height, clear space between legs, height of arm rests above the seat, radius of the front edge of seats, edge projections and drainage of water.

38. Standards Part 10
 39. Standards Part 11
 40. Standards Part 24
 41. Standards Part 25
 42. Standards Part 2
 43. Standards Part 3
 44. Standards Part 4
 45. Standards Part 5
 46. Standards Part 6

47. Standards Part 8
 48. Standards Part 9
 49. Standards Part 12
 50. Standards Part 13
 51. Standards Part 14
 52. Standards Part 15
 53. Standards Part 18
 54. Standards Part 21
 55. Standards Part 23

Bus Stops

Compliance Targets

Bus stops are treated separately to other infrastructure in the compliance schedule so that providers can upgrade all components of a particular bus stop at the one time. For example, on everything but bus stops, signs and symbols must be 100% compliant by 31 December 2007.

Details of the requirements relating to each item listed below can be found in the Premises and Infrastructure section.

Compliance Targets for Bus Stops					
Item	Standards Reference Number	Compliance %			
		31/12/07	31/12/12	31/12/17	31/12/22
Access paths	2	25	55	90	100
Manoeuvring areas	3	25	55	90	100
Passing Areas	4	25	55	90	100
Ramps	6	25	55	90	100
Waiting Areas	7	25	55	90	100
Boarding	8	25	55	90	100
Allocated space	9	25	55	90	100
Surfaces	10	25	55	90	100
Handrails and Grabrails	11	25	55	90	100
Stairs	14	25	55	90	100
Symbols	16	25	55	90	100
Signs	17	25	55	90	100
Tactile ground surface indicators – TGSi	18	25	55	90	100
Lighting	20	25	55	90	100
Street Furniture	23	25	55	90	100
Information	27	25	55	90	100

Equivalent Access and Unjustifiable Hardship ⁵⁶

Equivalent Access

Meaning of equivalent access

'Equivalent access' refers to alternative methods of assisting passengers with disabilities to use public transport where there are unavoidable constraints on unassisted access.

Compliance with Standards

- (1) Compliance with these Standards may be achieved by:
 - (a) applying relevant specifications in these Standards before the target dates; or
 - (b) using methods, equipment and facilities that provide alternative means of access to the public transport service concerned (but not using separate or parallel services) with equivalence of amenity, availability, comfort, convenience, dignity, price and safety.
- (2) This may include direct assistance over and above that required simply to overcome discrimination.

Consultation about proposals for equivalent access

The operator or provider of a public transport service must consult with passengers with disabilities who use the service, or with organisations representing people with disabilities, about any proposal for equivalent access.

Equivalent access without discrimination

Operators and providers must be able to demonstrate that equivalent access provides public transport without discrimination 'as far as possible'.

Methods of providing equivalent access

- (1) The Disability Standards do not allow for equivalent access to be provided by a segregated or parallel service such as an accessible taxi service substituting for an inaccessible bus service.
- (2) The Disability Standards are intended to remove discrimination from public transport services. They do not impose particular technical solutions where other methods are equally effective and appropriate.
- (3) For example, there is no impediment to an operator using a high floor bus with a boarding platform rather than a low floor bus with a ramp.

Provision of direct assistance

- (1) An operator or provider will be regarded as giving equivalent access to public transport when assistance is provided to the person in a way that gives an equivalent level of access to the service. The level of assistance provided should be in response to the person's independence and should enable the person to preserve his or her dignity. This assistance can be given during or after the implementation period.
- (2) An operator or provider is permitted to give direct assistance in emergency situations such as evacuation.
- (3) An operator or provider may give equivalent access through direct assistance to a person over and above that provided to other passengers as follows:
 - (a) before and after travel;
 - (b) during boarding and alighting;
 - (c) while travelling.

Assistance before or after travel

If an operator can not provide services in a way that is accessible to all people with disabilities, they can assist passengers with:

- (a) information about the service; or
- (b) the purchasing and validation of a ticket.

Assistance during boarding and alighting

- (1) People with disabilities can be assisted to board or alight from conveyances, such as coaches and aircraft, through the provision of:
 - (a) mobility aids on conveyances where design constraints prevent use of a person's own mobility aid;
 - or
 - (b) assistance in moving from a wheelchair into a fixed seat if an allocated space is not provided.
- (2) In giving assistance, the operator may decide that passengers with disabilities should board before, and alight after, other passengers.

Assistance while travelling

Once on board, passengers with disabilities may request assistance with:

- (a) information about the approach of their stop; or
- (b) moving to and from on-board facilities or toilets; or
- (c) information or advice if there is an unscheduled change to services, or the timeframe does not allow for information to be provided in a preferred format.

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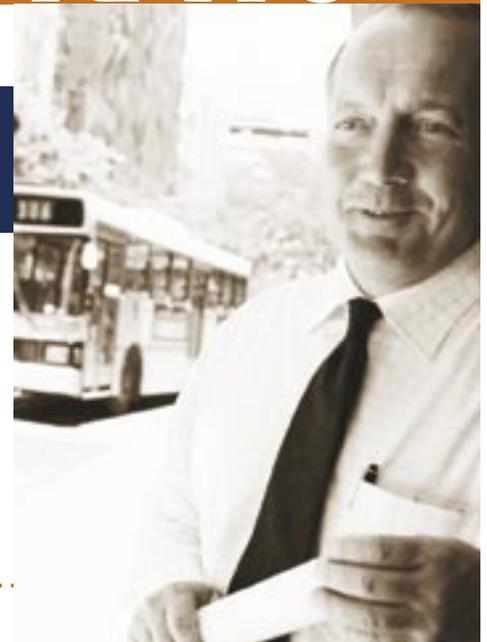
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Unjustifiable Hardship

33.7 Exceptional cases— unjustifiable hardship

- (1) It is not unlawful to fail to comply with a requirement of these Standards if, and to the extent that, compliance would impose unjustifiable hardship on any person or organisation.
- (2) However, compliance is required to the maximum extent not involving unjustifiable hardship.
- (3) In determining whether compliance with a requirement of these Standards would involve unjustifiable hardship, all relevant circumstances of the particular case are to be taken into account including the following:
 - (a) any additional capital, operating or other costs, or loss of revenue, that would be directly incurred by, or reasonably likely to result from, compliance with the relevant requirement of these Standards;
 - (b) any reductions in capital, operating or other costs, or increases in revenue, that would be directly achieved by, or reasonably likely to result from, compliance with a relevant requirement of these Standards;
 - (c) the extent to which the service concerned operates, or is required to operate, on a commercial or cost-recovery basis;
 - (d) the extent to which the service concerned is provided by or on behalf of a public authority for public purposes;
 - (e) the financial position of a person or organisation required to comply with these Standards;
 - (f) any effect that compliance with the relevant requirement of these Standards is reasonably likely to have on the financial viability of a person or organisation required to comply, or on the provision of the service, or feature of service, concerned;
 - (g) any exceptional operational, technical or geographic factors, including at a local or regional level, affecting a person or organisation's ability to comply with a relevant requirement of these Standards;
 - (h) financial, staffing, technical, information and other resources reasonably available to a person or organisation required to comply with these Standards, including any grants, tax concessions, subsidies or other external assistance provided or available;
 - (i) benefits reasonably likely to accrue from compliance with relevant requirements of these Standards, including benefits to people with disabilities, to other passengers or to other persons concerned, or detriment likely to result from non-compliance;
 - (j) detriment reasonably likely to be suffered by an operator, provider, passenger or other person or organisation concerned, including in relation to equality of amenity, availability, comfort, convenience, dignity, price and safety of services or effectiveness and efficiency of operation if compliance with relevant provisions of these Standards is required;
 - (k) if detriment under paragraph (j) involves loss of heritage values— the extent to which relevant heritage value or features of the conveyance, building or other item concerned are essential, and to what extent incidental, to the transport service provided;
 - (l) whether compliance with a requirement of these Standards may reasonably be achieved (including by means of equivalent access as provided for in sections 33.3 to 33.5) by less onerous means than those objected to by a person or organisation as imposing unjustifiable hardship;
 - (m) any evidence regarding efforts made in good faith by a person or organisation concerned to comply with the relevant requirements of these Standards;
 - (n) if a person or organisation concerned has given an action plan to the Commission under section 64 of the Disability Discrimination Act 1992 — the terms of that action plan and any evidence regarding its implementation;
 - (o) the nature and results of any processes of consultation, including at local, regional, State, national, international, industry or other level, involving, or on behalf of, an operator concerned, any infrastructure providers as relevant, and people with a disability, regarding means of achieving compliance with a relevant requirement of these Standards and including in relation to the factors listed in this section;
 - (p) if a person or organisation seeks a longer period to comply with these Standards, or a requirement of these Standards, than is permitted by the preceding sections on Adoption and Compliance— whether the additional time sought is reasonable, including by reference to the factors set out in paragraphs (a) to (o) above, and what undertakings the person or organisation concerned has made or is prepared to make in this respect.
- (4) If a substantial issue of unjustifiable hardship is raised having regard to the factors listed in paragraphs (3)-(a) to (p), the following additional factors are to be considered:

EQUIVALENT ACCESS & UNJUSTIFIABLE HARDSHIP

- (a) the extent to which substantially equal access to public transport services (including in relation to equality of independence, amenity, availability, comfort, convenience, dignity, price and safety) is or may be provided otherwise than by compliance with these Standards;
- (b) any measures undertaken, or to be undertaken by, on behalf of, or in association with, a person or organisation concerned to ensure such access.

(5) For these Standards:

unjustifiable hardship is to be interpreted and applied having due regard to the scope and objects of the Disability Discrimination Act 1992 (in particular the object of removing discrimination as far as possible) and the rights and interests of all relevant parties.

33.12 Non-compliance due to unjustifiable hardship

- (1) The Disability Discrimination Act 1992 recognises that an operator or provider need not comply with the provisions of the Act if it is proved that the operator or provider will be exposed to unjustifiable hardship. This defence is restated in the Disability Standards to ensure that it remains available in exceptional circumstances.
- (2) The definition of unjustifiable hardship is based on the definition in the Disability Discrimination Act 1992. This is consistent with the performance-based approach of the Disability Standards. If this definition expands on the definition in the Disability Discrimination Act 1992, it should be considered as being in addition to and, to the extent possible, consistent with the definition in that Act.

33.13 Maximum compliance required

- (1) Notwithstanding an unjustifiable hardship defence, if an operator or provider cannot comply with all requirements of the Disability Standards, the Standards require compliance to the maximum extent possible.
- (2) In such a case, and if a complaint is lodged with the Human Rights and Equal Opportunity Commission, the operator or provider will be required to establish the grounds upon which full compliance with the Disability Standards imposes unjustifiable hardship on the operator or provider in relation to the operation of the service.

33.14 Matters to be taken into consideration

- (1) The Disability Standards include a checklist of factors that may be taken into consideration in arguing unjustifiable hardship. The checklist is not exclusive.
- (2) It is intended that the checklist will assist the Human Rights and Equal Opportunity Commission, the Federal Court and the Federal Magistrates Service by outlining the major matters relevant to public transport.
- (3) An operator or provider that is seeking to prove unjustifiable hardship must also prove that the opportunities for providing equivalent access have been exhausted.
- (4) For example, after consulting with relevant authorities and passengers about equivalent access, a ferry operator may conclude that difficult topographical conditions at a wharf present unique problems and may choose to argue unjustifiable hardship.

33.15 Exemptions

- (1) Amendments to the Disability Discrimination Act 1992 have been made to allow for applications to be made to the Human Rights and Equal Opportunity Commission (HREOC) for the granting of an up-front exemption, for example, on the basis that it may not be possible to fully comply with disability standards for financial, technical or other reasons. An operator or provider would have to comply with any terms and conditions specified, for the period specified, in the exemption instrument.
- (2) An exemption will protect an operator or provider from a complaint that might otherwise arise about a breach of the relevant disability standards. Exemptions can be granted for a maximum of 5 years and a further exemption application can be made.

- (3) Before granting an exemption from the Disability Standards, HREOC must take into account the advice of a body prescribed in the Regulations. The body prescribed for that purpose is the National Transport Secretariat. HREOC may also consult any other body or person about the exemption.

56.

Commonly Asked Questions

*What mobility aids are unsuitable for transport on a bus or coach?*⁵⁷

Mobility aids should meet the specifications set out below.

Weight	The combined weight of the passenger and the mobility aid needs to be less than 300 kg
Width	The overall width of the mobility aid needs to be less than 800 mm.
Manoeuvrability	The mobility aid would need to be capable of turning through 180 degrees within an area of 2070 mm by 1540-mm
Allocated space	The space for stationary mobility aids is 800 mm wide by 1300 mm long. Wheels A mobility aid should be able to: <ul style="list-style-type: none"> (a) cross a horizontal gap up to 40 mm wide; and (b) mount a vertical rise (bump) up to 15 mm; and (c) cross grating gaps up to 13 mm wide and 150 mm long
Brakes	Mobility aids need to have effective braking systems to maintain stability and be able to withstand acceleration, braking, cornering and pitching of conveyances
Anchoring devices	If anchoring devices are required by regulation, mobility aids need to be able to accept and travel with anchoring devices fitted
Ramps	Mobility aids should be able to negotiate: <ul style="list-style-type: none"> (a) a 1 in 12 ramp unassisted; and (b) a 1 in 8 grade where the ramp is less than 1520-mm
Batteries	Electric mobility aids may need to comply with regulations governing the carriage of batteries on public transport. Batteries need to be adequately secured while gel or solid state options should be considered

*What do I tell my drivers about providing assistance?*⁵⁸

It is expected that Passengers in wheelchairs or mobility aids must be able to enter and exit a bus (but not coach) and position their aids in the allocated space. If this is not practicable, operators must provide equivalent access by direct assistance.

If the design restrictions of a coach limit on-board manoeuvring areas for wheelchairs and similar mobility aids, the operator of the coach must ensure equivalent access by direct assistance to passengers.

*Do I have to allow carers to travel free?*⁵⁹

Operators may choose to offer free travel to carers but it is not a requirement apart from persons who are accompanying the holder of an Ex-Member of the Defence Forces pass.

The Standards state that "All passengers must be prepared to pay fares."

What if there are insufficient accessible toilets at the spots I take tours?

In these situations it is essential that arrangements to deal with this problem be determined in advance. The passenger may in this instance elect not to travel or suitable arrangements determined by means of providing equivalent access by direct assistance.

COMMONLY ASKED QUESTIONS

Once on board, passengers with disabilities may request assistance with moving to and from on-board facilities or toilets.⁶⁰

What if I use my vehicle for school services and route services?⁶¹

A bus is a dedicated school bus only during the time in which it is being used to provide a dedicated school bus service. Therefore, if the bus is used for route service, the number of trips the bus does on route service will be taken into account in calculating compliance with the targets.

All buses used on route services must be accessible by 31 December 2022 regardless of whether they are used for other purposes.

-
57. Guidelines Part 40.1
58. Standards Part 3.2
59. Standards Part 25 and Commercial Contract
60. Standards Part 33, Guidelines Division 33.11
61. Standards Part 1.13



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Definitions

Division 1.2 Meaning of important terms⁶²

1.8 Purpose of Division 1.2

- (1) This Division gives the meanings for some important terms used in these Standards.
- (2) Unless the contrary intention appears, any other term that is used in these Standards and in the Disability Discrimination Act 1992 has the same meaning in these Standards as it has in the Act.

Note See section 4 of the Disability Discrimination Act 1992 for definitions of other relevant terms, for example **disability** and **disability discrimination**.

1.9 Access path

An access path is a path that permits independent travel for all passengers within public transport premises, infrastructure or conveyances.

1.10 Airport that does not accept regular public transport services

An airport that does not accept regular public transport services is an airport that accepts aircraft other than aircraft that operate for the purpose mentioned in paragraph 206-(1)-(c) of the Civil Aviation Regulations 1988.

1.11 Allocated space

An allocated space is a three dimensional space that can accommodate a wheelchair or similar mobility aid.

1.12 Conveyance

- (1) A conveyance includes any of the following, to the extent that they are used to provide a public transport service:
 - (a) aircraft;
 - (b) buses or coaches;
 - (c) ferries;
 - (d) taxis;
 - (e) trains, trams, light rail, monorails, rack railways;
 - (f) any other rolling stock, vehicle or vessel classified as public transport within its jurisdiction by regulation or administrative action of any Government in Australia.
- (2) A conveyance does not include the following:
 - (a) charter boats (including water taxis);
 - (b) limousines (including chauffeured hire cars);
 - (c) self-drive rental cars.

1.13 Dedicated school bus and dedicated school bus service

- (1) A bus is a dedicated school bus only during the time in which it is being used to provide a dedicated school bus service.
- (2) A dedicated school bus service is a service that operates to transport primary or secondary students to or from school or for other school purposes.

1.14 Dial-a-ride service

A dial-a-ride service is a service that:

- (a) is usually operated by a small bus; and
- (b) serves a local community; and
- (c) operates on flexible routes that allow passengers to be picked up and dropped off at their front doors.

1.15 Direct assistance

Direct assistance is help given by an operator or provider:

- (a) to make public transport accessible to a person with a disability when premises, infrastructure or

conveyances do not fully comply with these Standards; or
 (b) to provide non-discriminatory access on request.

1.16 Equivalent access

- (1) Equivalent access is a process, often involving the provision of direct assistance, under which an operator or provider is permitted to vary the equipment or facilities that give access to a public transport service, so long as an equivalent standard of amenity, availability, comfort, convenience, dignity, price and safety is maintained.
- (2) Equivalent access does not include a segregated or parallel service.

1.17 Hail-and-ride service

A hail-and-ride service is a service operated by a bus that follows set routes, but may stop for passengers at any safe point on the route.

1.18 Infrastructure

- (1) Infrastructure is any structure or facility that is used by passengers in conjunction with travelling on a public transport service.
- (2) Infrastructure does not include any area beyond immediate boarding points (for example, bus stops, wharves, ranks, rail stations, terminals).

1.19 Manoeuvring areas

A manoeuvring area is a space in which a wheelchair or similar mobility aid is able to turn.

1.20 Operator

- (1) An operator is a person or organisation (including the staff of the organisation) that provides a public transport service to the public or to sections of the public.
- (2) A public transport service may have more than one operator.

1.21 Premises

- (1) Premises are structures, buildings or attached facilities that an operator provides for passenger use as part of a public transport service.
- (2) Premises are a form of infrastructure.

1.22 Provider

- (1) A provider is a person or organisation that is responsible for the supply or maintenance of public transport infrastructure.
- (2) A provider need not be an operator.

1.23 Public transport service

- (1) A public transport service is an enterprise that conveys members of the public by land, water or air.
- (2) A public transport service includes:
 - (a) community transport conveyances that are funded or subsidised by charity or public money and that offer services to the public; and
 - (b) foreign aircraft and vessels that carry passengers to, from, or in Australia and that offer services to the public.
- (3) A public transport service does not include a service that provides adventure travel (for example, white water rafting, ballooning or amusement park rides), except to the extent that the service operates to move the public from one location to another distant location.

57.	Guidelines Part 40.1
58.	Standards Part 3.2
59.	Standards Part 25 and Commercial Contract
60.	Standards Part 33, Guidelines Division 33.11
61.	Standards Part 1.13
62.	Standards Part 1

References

- Australian Standard AS 1428.1-2001 Design for access and mobility
Part 1: General requirements for access – New building work
<http://www.standards.com.au/catalogue/script/search.asp>
- Australian Standard AS 1428.2-1992 Design for access and mobility
Part2: Enhanced and additional requirements – Buildings and facilities
<http://www.standards.com.au/catalogue/script/search.asp>
- Best Practice Guidelines for NSW Public Transport Signage and Information Displays
http://www.transport.nsw.gov.au/pubs_legal/signage_guide.pdf
- Disability Discrimination Act 1992
http://www.austlii.edu.au/au/legis/cth/consol_act/dda1992264/
- Disability Standards for Accessible Public Transport 2002
<http://www.ag.gov.au/DSFAPT/2002distransport.htm>
- Disability Standards for Accessible Public Transport Guidelines 2002
<http://www.ag.gov.au/DSFAPT/distransportguide2002.htm>
- Final Draft Technical Review Report on Disability Standards for Accessible Public Transport
http://www.dotars.gov.au/atc/Report_for_Public_Comment_2002.pdf
- Human Rights and Equal Opportunity Commission - preparation of Action Plans
http://www.hreoc.gov.au/disability_rights/action_plans/Effective_Plan/effective_plan.html
- Public Information Symbol Signs AS 2899.1
- Practical Guide to Bus Service Information, ISBN 0 7313 9804 1, NSW Ageing and Disability Department, March 2001
- Accessible Transport Action Plan for New South Wales Transport Agencies
http://www.transport.nsw.gov.au/using_trans/access-trans-action-plan.html

APPENDIX 1 - ACTION PLANNING EXAMPLES

Note: The strategies included are examples and are not meant to be a complete list of strategies to enable bus operators to comply with the requirements of the DDA.

1) Information about services

BARRIER	STRATEGIES	RESOURCES	RESPONSIBILITY	TIMEFRAME
People with a disability do not always have alternative access to information.	Provide information on a website in accordance with W3C Web Accessibility Guidelines.	\$(insert amount) and staff (can include \$ value of staff time in overall cost. May also advise 'within existing budget' if it is impossible to separate financial resources required from an overall program).	Manager, Corporate Services.	Fully compliant website by [insert date]
	Develop a customer charter to improve the quality of information on customer service for people with disabilities.	See above	Customer Service Manager	Customer Charter published by [insert date]
	Implement revised format for bus timetables with an accessible format and font.	See above	Information Manager.	[insert percentage] of timetables in revised format by December 2003. [insert percentage] of timetables in revised format by July 2004.

2) Physical Access to services and infrastructure

BARRIER	STRATEGIES	RESOURCES	RESPONSIBILITY	TIMEFRAME
Bus services are not fully accessible. The corporate facilities of the transport provider may not be fully accessible to people with disabilities.	Increase the proportion of accessible buses in the fleet.	[insert dollars] million over [insert number] of years.	Manager, Purchasing.	[insert percentage] of the fleet to be accessible by 2007?
	Review services to develop a route priority policy for accessible buses.	Within route development budget.	Manager, Operations.	Accessible buses to feature on timetabled routes by [insert month]/200[insert year]
	Undertake an access audit of the transport provider's premises as part of an overall Asset Management Plan and make changes where required.	Within budget for Asset Management Plan.	Manager, Corporate Services.	Corporate facilities to be accessible to people with disabilities by - [insert month]/200[insert year]

3) Complaints procedures

BARRIER	STRATEGIES	RESOURCES	RESPONSIBILITY	TIMEFRAME
Complaint mechanisms are not fully accessible.	Develop a new customer feedback system including facilities for hearing-impaired persons (eg TTY Telephone Typewriter facility).	[insert dollar amount] from Information Management Budget.	Information Manager.	Complaint mechanisms fully accessible to people with disabilities by -[insert month]/200[insert year]

4) Staff training and employment practices

BARRIER	STRATEGIES	RESOURCES	RESPONSIBILITY	TIMEFRAME
Employees require disability awareness training.	Engage a consultant to provide disability awareness training to all staff.	Within staff training budget.	Manager, Corporate Services.	All staff to have received disability awareness training by -[insert month]/200[insert year]
Employees may not be aware of the specific safety needs of people with disabilities.	Include safety concerns of people with disabilities in safety training for staff.	Within staff training budget.	Manager, Corporate Services.	All staff to have received safety training including a disability safety module by -[insert month]/200[insert year]
Corporate planning may not include consideration of employees with disabilities.	Develop strategies to assist employees with disabilities including: <ul style="list-style-type: none"> • Workplace adjustment strategies to cope with specific disabilities, including alternate technologies; • Flexible working arrangements; and • Regular surveys of staff disability profiles. 	Within staff training budget.	Manager, Corporate Services.	Survey of staff disability profile to be completed by -[insert month]/200[insert year] Alternate technologies provided for employees with disabilities by -[insert month]/200[insert year]

5) Promoting positive community attitudes

BARRIER	STRATEGIES	RESOURCES	RESPONSIBILITY	TIMEFRAME
Passengers without disabilities may not be aware of the access needs of passengers with disabilities.	Promote transport initiatives that demonstrate that improved access is beneficial for the whole community.	Within advertising budget.	Manager, Information Services.	All future initiatives for people with disabilities should be marketed to include the wider community.

Appendix 2 – Action Planning Checklist

ACTION	PRIORITY AREAS FOR ACTION (Tick ✓ when action is complete)				
	INFORMATION ON-SERVICES	PHYSICAL ACCESS TO SERVICES	COMPLAINTS PROCEDURES	STAFF TRAINING & EMPLOYMENT PRACTICES	PROMOTING POSITIVE COMMUNITY ATTITUDES
Identify barriers to-access					
Identify Strategies to remove barriers to access					
Identify Resources required to implement strategies					
Identify responsible area/officers for each strategy					
Identify timeframe for completion of strategy					