



Closing the Accessibility Gap

How the accessibility of public transport can be improved through innovation to customer service standards and information provision.

A report by the Public Transport Ombudsman

September 2013

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Executive Summary - From the Ombudsman

Since appointed Ombudsman in 2010, I have seen the accessibility of public transport services in Victoria increase as key milestones towards compliance with the Disability Standards for Accessible Public Transport 2002 (DSAPT) have been reached and as operators develop new ways to improve their services for all commuters.



Improvements have included:

- more low floored buses and trams;
- construction of accessible railway stations and tram and bus stops; and
- the use of technologies such as smart phone applications, social media and email updates to provide service information and in some cases, real time information about when a service will arrive.¹

These improvements are a vital step forward as accessibility of service is relevant to all of us, no matter what our age, background or capabilities are.

We know that the accessibility of public transport is a key issue for people with disabilities, the elderly, young people, and parents with young children, people living in regional or rural areas and for people from non-English backgrounds. This is borne out in our casework and in the research and reports produced by the Victorian Council of Social Services (VCOSS) and the Victorian Equal Opportunity and Human Rights Commission (VEOHRC).²

It is unsurprising therefore that the number of complaints about the accessibility of public transport services to my office have increased over time, albeit they represent a small percentage of all complaints lodged.

The easy response when reviewing complaints about accessibility is that if the numbers are low, the issues are therefore not significant. However, when complaint data is reviewed with the knowledge that low numbers reflect many complaints that never find their way to a complaint handling system, we start to understand systemic accessibility issues, and how they can be practically and sensibly addressed.

It is my view that there is an obligation on all of us to work toward creating a truly accessible public transport system, where customer service and practical immediate

¹ As outlined on the PTV website <http://corp.ptv.vic.gov.au/managing-victoria-s-public-transport-network/accessibility-of-public-transport/action-plan-2006-12/>

² Creating Accessible Journeys (VCOSS July 2011), Rights in Focus: reports on the rights of older Victorians (VEOHRC October 2012), Rights in Focus: report on the rights of regional Victorians (VEOHRC) October 2012), Building the Scaffolding (VCOSS April 2013).

solutions are valued as highly as long-term plans for changes to infrastructure and compliance with relevant standards.

Why publish a report?

This report provides insight into how customer service delivery can impact the accessibility of public transport services and how it can be improved.

Through the investigation of many complaints, it is clear that compliance with legislation, regulations and standards is vitally important. However, if it is the singular focus of an industry and the only means used for measuring the accessibility of services, the enormous potential for improvements through innovations in customer service and information provision can be missed.

Over the past twelve months, I have seen a positive change in attitude and an increased focus on accessibility by operators. With the establishment of Public Transport Victoria (PTV) in April 2012, as the administrator of the public transport industry, I believe the industry is better placed than ever to develop and implement collective and comprehensive measures to improve the accessibility of services.

Recommendations are made throughout this report. They are based on the experience my office has gained through the investigation of individual complaints and systemic issues and the regular discussions my office has with Victorian commuters, the agencies that represent their views and the public transport industry.

Some of the recommendations are not new; they have been made before by organisations such as VCOSS and Travellers' Aid, which also recognise that improvements to training, customer service and information provision are key to improving accessibility.

What we found

Our review has found that poor customer service and inadequate or ineffective information provisions can be as great a barrier to accessibility as outdated infrastructure.

There are inconsistencies in operator training, policies and approaches, which add to what can already be a complex and confusing system, particularly when services do not run to schedule.

Positively, we have seen recent solutions to a number of causes of complaint to my office, that have remained unresolved for too long:

- the retrofitting of footplates to Combino trams to reduce the gap;

- website references to information about myki in languages other than English; and
- information for passengers about the prohibition of boarding bicycles at the first door of the first carriage of metropolitan trains is under development.

There is still much to do, however and having a positive approach to complaints and the valuable information they provide is a fundamental source of innovation.

The PTO has very constructive relationships with operators. Some use our expertise in handling complaints, to gain insights into the issues their customers face in accessing their services and have sought our feedback when developing key policies about accessibility.

In the past 6 to 9 months many operators have been developing Accessibility Actions Plans. One operator proactively sought our feedback prior to finalising their Plan. Other operators did not seek our input or provided draft Plans for us to consider in this review. I trust this report opens the door for future and ongoing consultation.

Being open to constructive feedback from key stakeholders, such as the PTO, consumer advocacy services and other dispute resolution bodies should form an essential part of planning and design in the public transport industry - whether it is new infrastructure, training or policy and process development.

Collective and comprehensive measures to improve the accessibility of services will not occur if solutions are developed in a feedback vacuum or if operators work in silos. Gaining these insights before committing pen to paper, investing resources or time, or making changes, can identify where problems may arise and how they can be avoided.

This work has already commenced. PTV has recently extended an invitation for me to be an observer at the Public Transport Access Committee, which provides ministerial advice about accessibility issues and I welcome this opportunity. In addition, we provided operators with the opportunity to comment on a draft version of this report prior to publication. The responses have been overwhelmingly positive.

The challenge for the industry is to now work together to deliver consistent and best practice customer service which is supported by information that is comprehensive, readily available and easy to understand. The time is right to take up this challenge and I look forward to my office playing a key part of this work.

Janine Young
Public Transport Ombudsman



We are
impartial and
objective

A case in point

Dan's Story

Dan uses a wheelchair. He couldn't find signs to advise passengers who use the wheelchair accessible entrance/exit at a city loop station about the location of replacement bus services.

He complained, using the operator's feedback email address, rather than using its online complaint form. He likes to use email as it is easier for him when using his smartphone and it means he has a record of his complaint.

He received a standard (although not automated) reply advising that he had used an invalid email address and should redirect his complaint to PTV or to the operator's online complaint form. Dan wasn't happy and continued to complain via the operator's feedback email address but did not receive any response.

He then contacted our office. We arranged a referral to the operator's customer service team. The operator advised Dan that while it appreciated his advice that it was easier for him to send an email, it only received customer complaints from the PTV call centre or via its online complaint form, which Dan had used before.

It also advised that it considered that the signage was adequate and there had also been advice about replacement bus services in the media, on its website and via its smartphone application. It advised that customers should take some responsibility to pre-plan their journey and inform themselves of changes to services.

Understandably, Dan wasn't happy with this response.

See over for what happened next.....

Dan's Story Continued

Dan recontacted us and we investigated.

We sent a formal request to the operator to review and respond to each of the issues Dan had raised.

The operator advised that in response to Dan's complaint, it would install permanent "rail replacement bus location" signage at prominent locations on the concourse level of the station, including near the lift that provides wheelchair access. It undertook to contact Dan directly, once the signs were installed.

This simple solution will increase the accessibility of the operator's service and removes the potential for complaints arising in future.

The operator has now amended its process for advising consumers that its feedback email address is an invalid way of lodging a new complaint. It now forwards new complaints received via this address to PTV for registration and allocation. This will ensure all complaints are recorded and responded to appropriately.

Dan was very pleased with the operator's response.

Dan's complaint has contributed to two practical and measurable improvements to the accessibility of public transport.

(P2013/2318 – Investigation)



We treat
ourselves
and others
with dignity

Summary of Recommendations

Recommendation 1

Develop an agreed definition of accessibility in the context of public transport services.

Recommendation 2

Develop standardised, industry wide training for all front line staff to provide effective, accessible and consistent customer service and communication.

Recommendation 2a

Develop and implement a regular auditing program for the effectiveness of training.

Recommendation 3

Review internal Authorised Officer training to assess whether gaps exist in current training regarding interacting with people who may have accessibility needs that are not immediately apparent.

Recommendation 4

Create better integration between complaint teams and accessibility areas to enable effective root cause analysis of accessibility complaints.

Recommendation 4a

Comprehensive operator review of the current approach to responding to complaints about accessibility.

Recommendation 5

Develop industry minimum standards for the provision of direct assistance to all commuters.

Recommendation 5a

Develop and implement a regular auditing program for adherence to minimum standards and their effectiveness in increasing accessibility.

Recommendation 6

Develop a one stop guide to using public transport in Victoria.

Recommendation 7

Develop industry best practice standards for making manual public announcements.

Recommendation 7a

Develop and implement a regular auditing program for adherence to standards and their effectiveness in increasing accessibility.

Recommendation 8

Develop an industry best practice standard for how real time information about changes to services is communicated.

Recommendation 9

Develop an updated guide to myki basics in a number of accessible formats.

Recommendation 10

All myki brochures to be made available online.

Recommendation 11

Develop a standard training module about concessions and passes and a pocket sized ready reference guide for frontline staff about entitlements provided by concessions and travel passes.

Recommendation 12

Explore the provision of direct assistance for applications for free travel passes.

Recommendation 13

Provide practical and intuitively located 'out of service' advice, signage and announcements.

Recommendation 14

Undertake comprehensive consultation with key stakeholders when considering changes to infrastructure, whether it involves colour schemes, seating or major works, to ensure that accessibility is built into the design.



We strive for
excellence
because we
value what
we do

The role of the Public Transport Ombudsman

The Public Transport Ombudsman Limited (PTO) is an independent industry-based Ombudsman scheme, established in 2004 to receive, investigate and resolve complaints about public transport services provided by Victorian public transport operators that are members of the PTO scheme.

PTO scheme members include passenger train, tram and bus companies, and others involved in providing public transport services, such as Public Transport Victoria (PTV), VicTrack and Southern Cross Station. The scheme is funded by the industry, based on an annual fixed membership fee and on a variable user-pays basis, calculated on annual complaint numbers.

The PTO complies with the *National Benchmarks for Industry-Based Customer Dispute Resolution Schemes 1997* and uses the principles of alternative dispute resolution to effectively and efficiently handle complaints. If a complaint cannot be resolved through agreement, the Ombudsman is able to make a binding decision to resolve the complaint, or may dismiss the complaint.

The PTO has extensive experience in handling customer complaints and working with the public transport industry to improve customer service practices and internal dispute resolution (IDR) processes. We also play an important role in the identification of systemic issues facing the public transport industry, including investigation and resolution of issues within PTO jurisdiction and referral to appropriate agencies for other issues.

We undertake regular engagement work with the Victorian community to increase awareness of and access to our independent dispute resolution service.

Further information about the operation of the PTO, including public reports can be found on our website www.ptovic.com.au.



Background

Since its establishment in 2004, the PTO has been handling complaints from consumers who have experienced barriers to accessing public transport in Victoria.

In July 2011, we began a targeted awareness strategy to ensure consumers who are most likely to experience accessibility challenges are aware of their right to complain; first to the public transport operator and then to our office if their complaint is not resolved.

How we handle complaints about accessibility

We only investigate complaints if the operator has had a reasonable opportunity to resolve it first. When a consumer contacts us and hasn't raised their complaint with the operator, or has raised it once and is open to continue dealing directly with the operator, we will arrange a referral back to the operator's internal dispute resolution process.

Where a consumer has tried to resolve their complaint directly with an operator on more than one occasion and remains dissatisfied, we will investigate.

There are limits to the extent of investigations we undertake and to the outcomes we can achieve. They are:

- The Victorian Government, through Public Transport Victoria (PTV), and transport operators have responsibilities under the *Disability Discrimination Act 1992 (Cth)*, the *Equal Opportunity Act 2010 (Vic)* and DSAPT. The PTO has jurisdiction to review the actions of operators and but not to review the actions of the Victorian Government or PTV in its role as system administrator.
- The PTO can identify a lack of operator compliance with legislation, regulation or standards, but does not have an enforcement role. Where we identify potential non-compliance, we most often refer the complaint to the relevant regulator or body that administers the legislation, regulation or standards. Alternatively, we may refer the consumer to the most appropriate dispute resolution forum, such as the Australian Human Rights Commission (AHRC) or VEOHRC.
- The Ombudsman has the power to make a binding decision to resolve a complaint. The value of any decision cannot exceed \$5,000 (or \$10,000 with the agreement of all parties). A decision directing an operator to make a service(s) accessible through changes to infrastructure would most likely exceed these monetary limits.

It is therefore difficult for the PTO to resolve accessibility complaints that relate to changes to public transport infrastructure.

We investigate specific incidents relating to accessibility. This includes the application of the operator's policy; the interaction between the consumer and operator staff, complaint handling and the steps the operator can take to prevent reoccurrence, regardless of infrastructure limitations.

By taking this approach, complaints are often resolved through the provision of information about accessible services, staff training, the implementation of new policies or processes to increase accessibility, the provision of compensation and apologies.

What we know about barriers to making complaints

In June 2011, we commissioned an independent survey to measure the level of awareness of our services. We surveyed 53 organisations representing people who were socially, economically, intellectually or physically disadvantaged and who used public transport.

Of the organisations surveyed, we found that 70% of the people they represent use public transport daily. Accessible links to public transport are vital to ensure they are able to meet the needs of their daily lives; travelling to work, to study, to see family and friends and to connect to their community.

Inaccessible services have profound effects on people's lives. It can frustrate, debilitate and isolate. It can strip people of their confidence and dignity and their ability to live independent lives.

We also know from our survey, that for people who have no choice but to rely on public transport regularly, they are often unable, reluctant or unwilling to complain when things go wrong. 60% of the organisations that responded indicated that their clients would not contact our office if they had a complaint about the accessibility of public transport services.

Reasons for not complaining included communication impairments, a lack of awareness of their right to complain, a fear or lack of trust in authority, concerns that complaint systems are too complex to use and a lack of confidence that the complaint would be resolved.

We consider the above reasons are as likely to apply to consumers making a complaint to a public transport operator's internal dispute resolution process, as they are to complaining to the Ombudsman.

It is for these reasons that complaints about accessibility often go unreported and unrecorded. It is therefore our view that low complaint numbers cannot be used to draw conclusions about customer satisfaction with the accessibility of public transport.

Methodology

This review specifically focused on enquiries and complaints made to the PTO between 1 January 2011 and 31 December 2012.

Our complaint data

During this period, we received 6,433 individual enquiries and complaints:

- 172 complaints (2.67% of all cases) were about the accessibility of public transport services³;
- 38 complaints were formally investigated; and
- 134 complaints were referred back to the operator's internal dispute resolution process, or to other bodies, such as the AHRC and VEOHRC.

Many of the complaints lodged during the period highlighted ongoing, and sometimes systemic, problems with the accessibility of public transport in Victoria.

What consumers told us

Case studies are provided throughout this report to illustrate some of the issues raised with us and are based on consumer statements about their experience. In some instances, we did not investigate the complaint. When we refer complaints back to the operator for direct resolution, we are not always advised of the operator's view, or the outcome of, the complaint. Each case study is marked to indicate whether an investigation was undertaken.

Not all of the specific complaint issues raised with our office during the period have been included in this report. We have highlighted issues that had, or continue to have, the potential to affect more than one consumer.

The names of the individuals who contacted us have been changed.

What operators told us

Operators were invited to provide information to assist our review and to increase our understanding of what they are doing to improve the accessibility of public transport in Victoria, in addition to compliance with DSAPT.

We have reviewed operator information about:

- staff training;
- policies and processes for ensuring services are as accessible as possible;
- the level of integration between complaint teams and the area of the business responsible for improving accessibility; and

³ Between 1 January 2013 and 30 June 2013, there has been a slight reduction in the complaints about accessibility lodged with the PTO (2.05% of all cases received).

- the innovative approaches they are taking beyond the minimum requirements of DSAPT.

This information is included throughout the report.

Other information have we considered

Our review was also informed by the research and reports of VCOSS, VEOHRC and the Department of Human Services and some of the advocacy services and peak bodies who represent the needs and rights of people who use public transport.⁴

What we have focussed on and why

Our review focused on the initial statements made by consumers about the nature of their complaint and the impact it had on them, and on the formal responses provided by operators during the course of PTO investigations.

We have not focused our review on issues of compliance with legislation and standards, as it is our experience that:

- journeys can become inaccessible even when infrastructure complies with all relevant accessibility standards;
- standards and issues of compliance can sometimes get in the way of understanding the true nature of the complaint and the impact it had on an individual; and
- a focus on compliance can limit the potential for flexibility and creativity in developing practical solutions to accessibility issues.

We have intentionally framed this report in terms of the act of using public transport services rather than on the individual characteristics, capabilities or disabilities of the people who contacted us.

Key questions that underpinned our review

Our review and the development of recommendations was underpinned by three key questions:

1. Did the consumer get to their destination, unhindered and as independently as possible?

⁴ Creating Accessible Journeys (VCOSS July 2011), Building the Scaffolding (VCOSS April 2013) Rights in Focus: reports on the rights of older Victorians (VEOHRC October 2012), Rights in Focus: report on the rights of regional Victorians (VEOHRC October 2012), Draft Victorian State Disability Plan for Consultation (DHS June 2012), Victoria State Disability Plan 2013-2016 and The Companion Document to the Victorian State Disability Plan 2013-2016 (DHS December 2012), Tell me where I am! Audible announcements and the experience of people who are blind or vision impaired on Melbourne transport – April 2012. (Blind Citizens Australia)

2. If not, why not?, and
3. What practical steps could be taken to avoid the problem recurring and to increase accessibility in future?

Structure of our report

When reviewing our case data we identified five areas, which form the structure of this report:

1. Staff interactions and customer service;
2. Getting on and getting off public transport;
3. Finding your way - information provision at stations, stops and on vehicles;
4. The ticketing system – myki, concessions and travel passes; and
5. Infrastructure.

Recommendations

Recommendations for improvements to the accessibility of public transport are made throughout the report. They are practical and achievable in the short term, and are made in the context of the PTO's jurisdiction and powers.

They generally focus on a 'whole of industry approach' and not on individual operators.

Recommendations are intended to complement, not replace or interfere with, the timetable for compliance with DSAPT.

Recommendations for wholesale changes to infrastructure and vehicles have not been made, as this is beyond the scope of our review and our role.



We lead through
encouragement,
guidance and
innovation

Our starting point – what is accessible public transport?

As a starting point for our review, we considered the many and varied views of what accessibility means.

We found that operators have their own definitions of what accessibility means in the context of their business and that these definitions are not always consistent. Some operators take a broad view of accessibility, while others focus on disability access, compliance with DSAPT and funding arrangements with the state government.

Accessibility is not purely about compliance with standards and it isn't just about being able to get on and off public transport services.

VCOSS, in its July 2011 Report - Creating Accessible Journeys - articulated the need for a shift in thinking about accessibility. It stated that accessibility should not be viewed as concern for a *'select group of people with specific disabilities'*, and that it relates to us all, as *'all Victorians are likely to need and benefit from accessible features at some point in their lives'*.⁵

The PTO shares this view. Accessibility is about all of us and it should be defined broadly, as being about a consumer's ability to reach their destination unhindered and as independently as possible.

Recommendation 1

An agreed definition of accessibility

The PTO recommends that a single broad definition of 'accessibility', that is not limited only to issues of compliance with standards, be developed by the industry and adopted by all public transport operators.

This approach, if implemented effectively, will:

- create a collective and integrated approach to improving accessibility, which complements the aims of PTV, as system administrator, in developing better coordination between modes, expansion of the network, and promoting public transport as a viable alternative to private transport;⁶
- communicate a shared understanding to consumers about what accessibility means in the context of an individual transport service and the industry as a whole;

⁵ Page 4, Creating Accessible Journeys (VCOSS July 2011).

⁶ See <http://ptv.vic.gov.au/about-ptv/public-transport-victoria/>

- ensure that complaints about accessibility are identified, categorised and managed consistently across the industry;
- ensure accurate comparative reporting of complaint numbers, enabling trends, systemic issues and increases and decreases to complaint numbers to be identified by mode, operator or the industry as a whole; and
- provide a basis to accurately record and measure real improvements to the accessibility of services above and beyond those created by meeting the key milestones required by DSAPT.

Staff Interactions & Customer Service

Matt's Story

Matt was waiting at Federation Square to board his tram so he could get home after a day of study in the city.

As Matt uses a mobility aid he ensures that he boards trams at accessible stops.

When boarding the tram Matt's rear wheel became stuck between the platform and the tram.

Unable to move, he asked an operator staff member at the stop to help him board the tram. The staff member didn't acknowledge or assist Matt.

Matt was lucky that other passengers were happy to help him get on the tram so he could get home.

(P2011/0195 – Investigation)

Staff Interactions and Customer Service

We all know that good customer service and positive staff interactions are vital to delivering public transport services.

This view is supported by the findings of VCOSS in its report *Creating Accessible Journeys*, where it noted that *"a repeated theme in consultations and academic research is that the attitudes, care and demeanour of transport staff are a critical factor in influencing people's experiences of public transport, and that poor experiences of staff behaviour can undo the benefit of many of the access features provided in the physical design of the system."*⁷

Our review found that the majority of cases during the period included either primary or secondary concerns about the level of customer service provided by operator staff.

Concerns were not limited to specific consumer groups, transport modes or operators.

Key areas of complaints included:

- staff behaving inappropriately during interactions;
- Authorised Officers approach to inspecting tickets;
- staff failing to help or offer assistance; and
- inadequate or poor responses to complaints.

Operators advised us that front line staff receive customer service and communication training during their induction, including about how to effectively communicate with people with disabilities.

Some operators have implemented, or are in the process of implementing dedicated training programs to ensure their staff have the necessary skills to identify when a commuter needs assistance, and the most effective method of communicating with that commuter.

Some training has been designed and/or delivered by organisations such as Travellers Aid Australia, Scope, Guide Dogs Victoria and Blind Citizens Australia. For example:

- Travellers Aid Australia regularly provides mobility and disability awareness to operator frontline staff;
- Regional train operator staff are progressively being trained through Scope's "See the person - See the Opportunity" disability awareness workshops; and

⁷ *Creating Accessible Journeys* pg 43 (VCOSS 2011)

- sixteen front line staff at the PTV Hub at Southern Cross Station received training from Guide Dogs Victoria in early 2013.

It appears however; that there is no standardised training to ensure that all front line staff, regardless of who they work for, or what mode of transport they are involved with, receive the same amount of training, or training about the same issues.

It is therefore understandable why complaints continue to arise about customer service and staff interactions. These issues may be easily and cost effectively avoided, by ensuring:

- all staff are appropriately trained to effectively deal with the varying needs of the travelling public in a positive and sensitive way; and
- effective internal feedback mechanisms exist across businesses which identify and address poor customer service practices early.

What our cases tell us

Every day, thousands of personal interactions occur between operator staff and consumers accessing public transport services. The vast majority occur without incident and most are positive and respectful.

When interactions with operator staff, including station attendants, drivers, call centre agents, customer complaint teams and Authorised Officers, do not go well; the accessibility of services can be significantly impacted and can have long term and unforeseen consequences.

A throwaway line, a comment uttered in frustration, or a reluctance or refusal to help can lead to people losing confidence when travelling. This can lead to people not using public transport at all; a decision with financial impacts through using private transport and/or one that can disconnect people from the things that are most important in their lives.

Inappropriate staff behaviour

While operators informed us that all front line staff receive training in customer service and communication, our review found that some consumers have experienced inappropriate behaviour from operator staff. This included:

- Consumers with disabilities or the elderly complained of being subjected to verbal abuse. For example:

- a concerned commuter contacted the PTO to complain after witnessing an elderly man being yelled at by a bus driver for not hailing the service with his hand, despite being physically unable to do so as he needed to hold onto his walking frame; and
- a man who had reconstructive knee surgery and used a walking stick to aid his mobility, complained after a bus driver refused to lower a ramp to assist him to board and then called him names after he took extra time to carefully board the bus via the stairs.
- Operator staff using inappropriate language or terminology when dealing with consumers. For example:
 - consumers using mobility aids complained of being advised they couldn't be 'loaded' onto a train service due to overcrowding, a term they found offensive.
- Customer service staff not adjusting their communication approach to meet the needs of individual consumers. For example:
 - a consumer complained that despite advising the customer service representative that he had a hearing impairment, the staff member did not move closer when talking to him.
- Operator staff incorrectly advising consumers that their right to travel was limited, based on concerns about safety, which appeared to have more to do with inappropriate or discriminatory attitudes. For example:
 - a young man with epilepsy complained that he was advised by a bus driver that he could not use a bus service in future without being accompanied by a carer as it wasn't safe;
 - a man complained after his sister was advised to stop breastfeeding her new born baby on a bus due to concerns for the baby's safety; and
 - a woman was advised that she would have to get off a service if she did not stop her 22 month old child from crying.

We recognise that providing front line services can be challenging in the sometimes complex setting of public transport, but it is never acceptable to be disrespectful, discriminatory, aggressive or rude.

It is our experience that often the biggest challenge for individuals providing front line services is not managing others, but managing their own responses.

Operators must ensure that staff are well supported and well trained, not only in the specific technical requirements of the role but also in how to communicate with people with varying needs and behaviours in a positive and respectful way.

Training cannot be limited to a one off module in an induction course. It is an ongoing learning process and requires regular refreshing and auditing to make sure it is effective.

Currently, training content and delivery is specific to the individual operator and our review indicates that some operators have developed much more comprehensive staff training than others.

Recommendation 2

Standardised industry-wide training

A public transport journey should involve integrated, consistent and high level communication and customer service regardless of the consumer's accessibility needs and regardless of what mode of transport they are using.

The PTO recommends that the public transport industry as whole, works together to develop comprehensive and standardised training, including regular refresher training, for all front line staff about how to communicate effectively with all consumers.

To ensure the training is as relevant and effective as possible, the industry should consult widely when developing it. Input should be sought from consumers and key agencies, including those who represent the needs and rights of people with disabilities, those from culturally and linguistically diverse backgrounds, the elderly and young people.

We understand that there will always be a need for operator and mode specific customer service and communication training, and this should continue to be developed and delivered by operators to ensure their staff are able to meet the needs of their customers. This recommendation is to compliment operator and mode specific training, not replace it.

Recommendation 2a

Regular auditing of training effectiveness

The PTO recommends that the industry develop a standardised method for regular auditing of the effectiveness of front line staff training. Measurements should include whether the training has increased the accessibility of public transport services and increased consumer satisfaction with staff interactions.

The industry should review and report on audit results promptly and develop any recommendations for improvements to training in consultation with key stakeholders.

Authorised Officers

Authorised Officers are required to conduct themselves within the statutory framework established by the *Transport (Compliance and Miscellaneous) Act 1983*, and other legislation including the *Charter of Human Rights and Responsibilities Act 2008*.

All Authorised Officers undergo an initial intensive training course provided by the operator employing them, about the use of their enforcement powers and appropriate behaviour towards the travelling public.

Authorised Officers must also complete a standardised Certificate III course - Public Transport Customer Service and Compliance - within 12 months of being authorised.⁸

The course includes training to develop effective communication skills when performing duties and interacting with commuters. It also includes specific training on how to interact and communicate with young people, the elderly, people with disabilities and people with English as a second language.

Despite this training, we received complaints about Authorised Officer interactions during the period.

Complaints indicated that Authorised Officers did not always recognise the need to tailor their approach to ticket inspection duties when a consumer has individual needs that may not be immediately apparent. Individual needs in this context include having English as a second language or coming from a culturally and linguistically diverse background, reduced mobility, homelessness, acquired brain injuries, mental illness and autism spectrum disorders. Examples included:

- a young man with autism complained that he suffered an anxiety attack which required hospitalisation after being approached by a group of Authorised Officers at an inner city train station. See Chris's story for more information.
- an elderly man with slow mobility, which was not immediately apparent as he was seated on a train, complained of feeling intimidated after being surrounded by three Authorised Officers, after it took him some time to take his ticket from his wallet for inspection.

⁸ The course is owned by the Department of Transport, Planning and Local Infrastructure and is licensed to specific registered training organisations. See the DTPLI website for more information.

Recommendation 3

Review of Authorised Officer training

The PTO recommends that the industry collectively strengthens the current content, consistency and frequency of internal training provided to Authorised Officers about how to effectively communicate with people (and/or their carers) who have individual needs that may not be immediately apparent; including behavioural and cognitive conditions such as autism, acquired brain injuries, mental illness or physical disabilities.

Chris's Story

Chris got off his train and made his way to the exit. He was wearing his headphones and wasn't aware that Authorised Officers were trying to get his attention so they could check his ticket.

By the time Chris realised he needed to show his ticket, five Authorised Officers had surrounded him. He showed his ticket but it took some time for the Authorised Officers to move on.

Chris has autism and found the interaction really confronting. He ended up needing hospital treatment because the incident brought on an anxiety attack.

(P2011/0820 – Non Investigation)

Responses to complaints

All operators have internal dispute resolution processes for handling complaints. At a minimum, these processes should comply with the *Australian Standard - Customer satisfaction – Guidelines for complaints handling in organizations* (AS ISO 10002-2006).

Processes should be accessible and easy to use. Complaints should be handled in a open, objective and customer-focused way. Complaints should be investigated thoroughly and all of the issues in dispute should be addressed, including the impact the complaint may have had on the individual.

Some operators have advised the PTO that complaints about accessibility are fed back into their organisations, including to the areas responsible for ensuring their business meets DSAPT requirements. This is to ensure that any recurring issues are identified and resolved.

Some consumers advised the PTO that when they lodged complaints about the accessibility of services with operators, responses often focused only on whether the service complied with DSAPT requirements and not on whether the journey was accessible for that consumer.

Further, responses often did not address the specific impact the issues had on the consumer.

As a result, consumers felt that their complaint had not been listened to or understood by the operator and the complaints remained unresolved.

Gerry's Story

Gerry uses a mobility aid. Having waiting in the rain at the designated marker for driver assistance to board, he complained after the metropolitan train driver rudely advised him that unless he had a reminder slip noting his destination there was no obligation for the driver to help him board the train. Gerry was able to verbally communicate effectively and didn't need to write down his destination in order to communicate it to the driver .

When Gerry arrived at Flinders Street Station he asked where he could complain about the driver's behaviour. He was referred to the Station Master's office, which was only accessible via stairs. Determined to be heard, Gerry left his mobility aid and with staff assistance pulled himself up the stairs to the Station Master's office. He was advised that if he wanted to lodge a complaint he should do so in writing via the operator's website.

The Station Master then assisted Gerry to the Customer Information Centre on the concourse level of the station, so he could discuss his concerns further. When he explained what had happened, he was given a branded notepad so he could write his destination down and give it to the driver when being assisted to board in future. He was also advised that he had to be positioned at the designated marker when the train arrived and if it was raining, he should use an umbrella. Gerry's medical condition affects his ability to use his hands and he isn't able to hold an umbrella.

Gerry was less than satisfied with this response - it focused on the minimum standards the operator had to meet and did not address his individual concerns.

(P2011/0189 - Investigation)

From our review, it appears that better integration between operator complaint handling areas and the areas responsible for the accessibility of public transport services would result in better complaint outcomes.

It is our experience that complaint-handling teams are often well placed to identify

innovative and flexible ways of resolving individual complaints.

This flexibility counts for very little, however, if other areas of the business are not attuned to its value and insist on viewing complaints on the basis of compliance alone.

By ensuring greater integration, areas responsible for accessibility will be exposed to the issues experienced by consumers when using services. They could then work with complaint teams to identify practical steps that could be implemented to resolve the individual complaint and to reduce the likelihood of the issue arising again in future.

Recommendation 4

Better integration between complaint teams and accessibility areas

The PTO recommends that all operators review the current arrangements they have in place for ensuring that their complaint handling areas are well connected to the areas responsible for accessibility of services and compliance with DSAPT.

At a minimum, these areas should regularly share complaint data and undertake root cause analysis of recurring complaint issues to identify short and long-term solutions to improve the accessibility of services.

Recommendation 4a

Review of approach to responding to complaints

The PTO recommends that operators undertake a comprehensive review of their approach to receiving and responding to complaints about accessibility.

Changes in approach must ensure that the issues raised and the impact to the consumer are appropriately responded to and resolved.

Responses should be tailored to the individual complaint and should not simply provide a standardised response outlining DSAPT requirements.

Responses should also include information about how the complaint will be fed back into the business to contribute to ongoing improvements to the accessibility of services.

Getting On & Getting Off Public Transport

John's Story

John uses a motorised scooter and relies on public transport to get to where he needs to go. John knows that when he catches a train, he needs to wait at the end of the railway platform, so the train driver can use a ramp to help him board.

One rainy lunchtime John took shelter under the main platform cover rather than waiting at the end of the platform in the rain. When the automated announcement advised the train was approaching, John quickly made his way down the platform to get into the right position to board.

He didn't make it on time, but he was sure the driver had seen him as the platform was not crowded. The driver didn't wait for him and the train left without him.

When he complained he was told he must always ensure he is at the designated marker when the train arrives otherwise the driver is not required to wait.

(P2012/1729-1 - Investigation)

Boarding and Disembarking

The inability to board or disembark a public transport service unhindered and as independently as possible poses fundamental barriers to the accessibility of services.

A DSAPT compliant, and technically accessible service, will become inaccessible to consumers who have lost confidence in being able to get on or get off that service.

Key areas of complaint to the PTO included:

- overcrowding and travelling with a mobility aid;
- not being in position to board;
- bicycles on train first carriages; and
- requiring driver assistance to board buses and trams.

Complaints were not limited to specific consumer groups, transport modes or operators.

How to get on and off services in Victoria

Each operator has their own way of assisting consumers to board and disembark their accessible services. The approaches taken are not consistent across the industry.

Consumers need to have specific knowledge about how each operator approaches boarding and disembarking, which can be confusing if using different modes of transport.

Outlined below is general information about the operators' current approaches to assisting people to board or disembark services.

Metropolitan Trains

A consumer travelling with a mobility aid, such as mobility scooter or wheelchair will be assisted to board a metropolitan train at the first door of the first carriage, if they are positioned at a designated marker on the platform when the train arrives at a station. The driver manually deploys a ramp to provide access to the carriage. The consumer must advise the driver of their destination and when they arrive at the nominated station the driver again uses the ramp to provide access to the platform.

There is no set time for how long a train will wait at a station with its doors open to allow passengers to board and disembark (referred to as dwell time). Dwell times will vary from station to station and are influenced by the number of passengers getting on and off services.

Trains doors make a warning sound prior to and while closing, to warn passengers not to board or disembark at this point. The train driver uses mirrors and/or monitors to

view the platform to assess whether it is safe to close the doors and prepare the train for departure.

Regional Trains

The train's conductor will manually deploy a ramp at any train door to assist a consumer travelling with a mobility aid to board and disembark the service. The consumer must advise the conductor of their intended destination at the beginning of their journey.

There is also no set time for how long a train will wait at a station with its doors open to allow passengers to board and disembark. Dwell times will vary from station to station and are influenced by the number of passengers getting on and off services. The conductor assesses the area outside the train to determine that it is safe to depart.

Trams

Consumers using a mobility aid can generally board a low-floored tram at an accessible stop independently and without requiring any direct assistance. Sometimes however, the gap between the tram and the accessible stop is too big for the mobility aid to cross. Tram drivers and customer service staff positioned on trams or at stops do not provide direct assistance to consumers when boarding or disembarking a service.

Dwell times at tram stops depend on general road traffic signals and conditions and priority signalling. The tram driver makes an assessment to close the doors and leave a tram stop after using mirrors to check that the inside and outside of the tram is free of obstruction. Some tram doors operate on an auto-close mechanism, closing automatically after a set period of time.

Buses

Some bus routes are fully wheelchair-accessible and others are only partly wheelchair-accessible. Some regional bus routes are not wheelchair accessible. At the stop, the bus driver lowers a retractable ramp to link the front door of the bus with the kerb of the road. Some regional coaches use a wheelchair lift.

Information about boarding and disembarking

Specific information about how to board and disembark services is available on each operator's website and in some publications. Some operators provide comprehensive user guides in a variety of formats, while others provide general summary information.

The PTV website provides a collation of information about how to board and disembark each different mode.

We were unable to locate any ready reference guide for consumers, which collates and explains how to get on and off all modes of public transport and what direct assistance they can expect.

Overcrowding and travelling with a mobility aid

Consumers using mobility aids complained that they were unable to board services, as tram and bus drivers did not ask other passengers to move from allocated spaces, when there was capacity in the vehicle for passengers to move to

Consumers using mobility aids also complained that at times they were unable to access metropolitan train services due to overcrowding in the allocated space at the first door of the first carriage.

While we appreciate that a driver may not be able to force other passengers to move from an allocated space, we believe a well-communicated announcement would prompt other passengers to move where space is available.

Not being in position at the train station

As outlined above, to catch a metropolitan train using a mobility aid, the consumer must be in position at a designated marker at the time the train arrives at the station before the driver will manually deploy a ramp to allow boarding. This marker is at the end of the station platform, adjacent to the driver's cabin / first carriage door.

Consumers complained that:

- they were required to wait at the designated marker in inclement weather or at night, often without any shelter or safety provisions (suitable lighting, CCTV etc); and
- some drivers did not provide consumers with reasonable additional time to get into position, despite it being clear the consumer was moving up the platform to get into position as the train pulled into the station.

The PTO considers that when a consumer is already moving along the platform before the train arrives at the station, it is likely that by the time the train comes to a stop, and the driver deploys a ramp, most consumers would be at the designated marker and ready to board.

The metropolitan train operator has advised that providing additional time for consumers to get into position in these circumstances is not feasible, as drivers are focussed on safely bringing the train into the platform and are not always aware of passengers moving along the platform. The operator advised that its drivers are only in a position to know that a ramp needs to be deployed if the consumer is at the designated marker when the train arrives at the station.

We understand that in the long term, shelters will be progressively built across the train network as funding becomes available. Positively, there are 19 new shelters currently being installed on the metropolitan rail network.

In the meantime, the issue of having to wait unsheltered in the rain, in the sun or at night continues to be a barrier to access that should be addressed.

Bicycles in train first carriages

Consumers complained that the metropolitan train operator did not prevent cyclists from boarding at the first door of the first carriage or from storing bikes in the space adjacent to this door, which is a space allocated for passengers using wheelchairs or mobility aids.

It is a condition of travel in the Victorian Fares and Ticketing Manual, as determined under section 220(D) of the *Transport (Compliance and Miscellaneous) Act 1983 (Vic)* that bicycles must not be boarded in this way.⁹ The condition is to ensure that the allocated space required under DSAPT is available for people using wheelchairs or other mobility aids.

Anecdotally, we understand that often cyclists use the first carriage to limit the impact their bicycle has on the comfort of other commuters, given there is more space (as intended under DSAPT) and those cyclists are often unaware of the prohibition on carrying bicycles in the first carriage.

The operator provides an allocated space for passengers using wheelchairs or mobility aids, as required by DSAPT. It does not, however display the international symbol of accessibility or define the size of the space with a contrasting strip on the floor area of the allocated space as required by section 9.10 of DSAPT, having been granted an exemption by the AHRC (via the Australasian Railway Association).

Given no symbol or contrasting strip is displayed on the floor area of the allocated space, it is possible that passengers do not know what the purpose of the space is.

We identified practical measures to improve the accessibility of services in the above scenarios, including:

- the placement of stickers in first carriages and/or on the first door of first carriages advising that bicycles are prohibited; and/or
- the placement of posters at stations advising of the prohibition and the reasons for it; and/or
- scripted driver or automated announcements made before deploying a ramp asking any passenger with a bicycle in the space near or adjacent to the first door of the first carriage to move to another carriage; and/or

⁹ See pg 70 of the Victorian Fares and Ticketing Manual (myki) <http://ptv.vic.gov.au/assets/PDFs/Vic-Fares-and-Ticketing-Manual/Fares-and-Ticketing-Manual-myki3.pdf>

- a renewed education campaign through bicycle advocacy groups.

In the case of requiring drivers to ask passengers with bicycles to vacate the allocated space, the operator advised that drivers do not have 'move on' or enforcement powers, so it did not consider this would be effective, as drivers could not compel passengers to move. The operator's Authorised Officers are empowered to make a Report of Non - Compliance when they come across a passenger with a bicycle in the allocated space, but only if the bicycle is causing an obstruction to someone with a mobility aid wanting to use that space.

We have recently been advised that PTV will take a lead role in resolving this issue and is in the process of producing new stickers for carriages of metropolitan trains outlining that bicycles are prohibited from being boarded at the first door of the first carriage or from being stored in the allocated space.

PTV will also contribute to an education campaign through Bicycle Victoria to ensure cyclists understand their rights and responsibilities when using metropolitan trains.

We welcome these simple and practical solutions, but note that these steps could have been taken a lot earlier to resolve this issue. Ongoing monitoring is needed to ensure that these initiatives are implemented in a timely way and are effective.

Requiring driver assistance to board buses and trams

Consumers complained about the lack of appropriate assistance provided when boarding and disembarking buses. Complaints included:

- ramps not being deployed when requested; as some drivers refused to do so when consumers were not in wheelchairs or their specific needs were not visible or immediately apparent to the driver. For example, consumers with Osteoarthritis using a walking frame or a walking stick;
- bus drivers refusing to move the bus closer to the curb to allow the ramp to be safely deployed; and
- ramps being ill-positioned so the gradient was too steep to safely board or disembark.

These complaints indicate a lack of adherence to policies about when direct assistance must be provided and deficiencies in staff training about how to identify and address any accessibility issues a consumer may have.

Consumers also complained that the tram operator will not use ramps to help board and disembark low-floored trams at accessible stops where the vertical/horizontal gap is too large for a wheelchair to cross.

The tram operator advised that after extensive risk assessments, it will not deploy ramps on any tram service unless it is an emergency.

Drivers are instructed to advise consumers to catch the next accessible service, or in the case of disembarking, drivers are to take the consumer to the nearest accessible stop to allow them to disembark – resulting in some consumers being set down at stops that are not near their destination.

In late 2012, the operator successfully trialled a footplate to reduce the horizontal gap on Combino trams. We understand that following these trials, a footplate has now been retrofitted to all 59 Combino trams, which will reduce the horizontal gap and increase the accessibility of services.

While this progress is commended, it is seven years since this issue was identified and articulated in the Victorian Government's 2006 - 2012 Accessible Public Transport Action Plan as a key action requiring an engineering solution.¹⁰

Dwell times

Consumers complained that due to the period provided for boarding and disembarking (dwell times) they had:

- missed their stop, causing significant inconvenience and stress;
- suffering extreme stress having been separated from young children or dependent adults in their care; and
- been injured or suffered property damage when the doors closed on them.

Consumers complained that while dwell times may be reasonable for most commuters, they were not long enough for others. Dwell times were of particular concern for people with impaired mobility who need to stay seated and wait for the vehicle to come to a stop before trying to disembark, for those carrying luggage or pushing prams, and for those travelling with young children or travelling in groups.

Cathy's Story

Cathy was travelling on a tram with her two small children. As Cathy attempted to get off the tram, the doors closed on the pram her 3 month old daughter was in, with such force that one of the pram wheels fell off. Cathy was very concerned that her baby could have been badly injured.

She lodged a complaint with the operator and it offered the pay for the costs of repairing the pram. She was advised that the driver must not have seen her trying to disembark as other passengers had obscured his view.

(P2011/1915 – Non Investigation)

¹⁰ See Action 34 2006-2012 Accessible Public Transport in Victoria Action Plan page 36-37

Being forgotten

During the review period consumers complained they had missed their stop as drivers or conductors had forgotten to announce their stop, and in some cases had forgotten to deploy ramps when needed.

The inconvenience, stress and frustration caused by being forgotten is significant. It can mean having to get off a service at a different stop and then wait for the next service in order to travel back to your destination, which could be 5 minutes or it could be 45 minutes or more. Alternatively, it can mean arranging a taxi or private transport.

We understand that sometimes things go wrong; having reminder systems or backup plans are a good way to avoid this.

In the past 6 months we have seen some innovative progress in this area.

To limit the potential for being forgotten, one operator is trialling a smartphone application that allows its conductors to record the details of the consumer's stop and using GPS, then sends a push notification to the smartphone alerting the conductor that the consumer's stop is approaching and that direct assistance in deploying the ramp is required.

Another operator is trialling a more traditional reminder system, and has produced 'sticky notes' for people with vision impairment to provide to drivers to remind them to announce their stop.

All operators should develop and trial new ways of ensuring that their customers get the assistance they have been promised and are entitled to. Collaboration between operators to develop a consistent reminder system across all modes would be most effective.

Other examples of failing to assist

In some instances, the only way a service is made accessible to some consumers is through the direct assistance provided by operator staff.

Operators have advised that in addition to improvements to the accessibility of infrastructure and vehicles under DSAPT, they have developed internal policies and processes about the provision of assistance to consumers when accessibility issues arise.

In some instances, policies state that providing assistance is mandatory, such as metropolitan train drivers using ramps to assist passengers with mobility aids to board and disembark.

In other instances, policies explicitly prohibit certain types of assistance being provided in certain circumstances, given the potential for occupational health and safety issues arising. For example, due to concerns about staff and passenger safety, tram drivers will not use ramps to assist boarding or disembarking except in an emergency.

In other instances, policies allow staff to use discretion about whether to provide direct assistance or not.

Policies about the provision of assistance are determined by the individual operator and are not consistent across the industry. This lack of consistency in approach by operators and in some instances by individual staff from the same operator, can lead to confusion about what consumers should expect when using services. This can cause complaints and at worst, can lead to consumers deciding that it is too difficult to use public transport at all.

Our review has found that some operator staff do not always follow their policies about the provision of assistance, leading to services being inaccessible for some consumers. Complaints during the period included:

- policy and processes being inconsistently applied, with direct assistance being provided by some staff and not others;
- customer service representatives ignoring requests for assistance from people with disabilities;
- drivers not responding to emergency button calls; and
- changes to policies resulting in direct assistance no longer being provided, without communication to consumers who relied on that assistance to get around and no alternative means of assistance being offered.

The PTO recognises that operators determine their own policies and processes about the provision of direct assistance and these may be impacted by cost considerations, risk assessments, occupational health and safety concerns and employment agreements.

We believe, however, that the industry should place a greater emphasis on the positive responsibility it has to provide a reasonable and consistent level of direct assistance to enable accessible journeys to occur.

At a minimum, consumers should know what level of assistance they can expect before they travel and they should be able to expect a commensurate level of assistance between modes of transport.

Recommendation 5

Development of industry standards for direct assistance

The PTO recommends that the industry develops, in consultation with key stakeholders, practical minimum standards for what type of direct assistance will be provided, on what mode of transport and when.

Standards should include all instances of when direct assistance will be provided, and when it will not be provided, including:

- boarding;
- disembarking;
- getting in, around and out of stations and stops;
- driver announcements/requests that other passengers in the vicinity of an allocated space move down the aisles when capacity permits this, to provide access to the allocated space; and
- provision of reasonable additional time for metropolitan train services, for consumers to get into position on days of inclement weather, at night, or where it is clear the consumer is moving towards the designated marker when trains are approaching the station.

Once developed, the standards should be implemented by all operators within agreed timeframes and should be publicly available.

Recommendation 5a

Regular auditing of direct assistance

The PTO recommends that the industry develop a standardised method for regular auditing of staff adherence to the minimum standards for the provision of direct assistance.

Auditing should include whether the standards have increased the accessibility of public transport services and increased consumer satisfaction with staff interactions.

Recommendation 6

A one stop guide to using public transport in Victoria

As highlighted by this section, each operator and each mode have different approaches to boarding, disembarking and direct assistance. Currently, it is very difficult to make an easy comparison of what to expect and to understand what it all means in the context of planning an individual accessible journey.

The PTO recommends that the industry produce a plain English and accessible 'one stop guide' to accessing and using all public transport in Victoria.

This guide should incorporate all relevant information about boarding, disembarking and travelling, accessibility considerations and the minimum standards for the provision of direct assistance across all modes.

The guide should be readily available in electronic and hard copy format. It should also be available in other formats including in languages other than English and upon request, in formats including large print, Braille and easy read.

Finding Your Way - Information Provision

Elizabeth's Story

Elizabeth's bus route changed and she now has to walk 15 minutes to catch her bus.

While this may seem a minor change for some, it is significant for Elizabeth as she has a vision impairment. The change has reduced the accessibility of the service for Elizabeth.

Elizabeth didn't think the changes were very well communicated by the bus operator.

To help understand the new route so she could plan her future journeys, she tried to access information on the PTV website using screen-reading software. She wasn't able to, as it appeared that the website didn't support the software she was using.

Despite her best efforts, she wasn't able to independently inform herself about using the altered bus service, which further reduced the accessibility of public transport.

(P2012/1125 – Non Investigation)

Information Provision

Knowing where you are, where you are going and having access to information to allow you to understand or interpret changes on the transport system is imperative to creating accessible journeys.

The amount of information and the different formats it is available in has improved over the past three years. Operators are creating new ways of communicating with their customers using new technologies – particularly smartphones and tablet devices – creating Apps, mobile sites and using social media to post real time service updates.

Despite these improvements, the PTO received complaints about navigating the public transport system, caused by a lack of information, or inconsistent or poorly communicated information.

Consumers complained about:

- announcements – including next stop information;
- signage; and
- communication about changes to services and infrastructure.

Announcements

Automated audible and written announcements on newer services and electronic displays at stations and stops have all increased the accessibility of services.

Problems arise however, when services do not run to schedule, when disruptions occur or where the service has not been fitted with automated systems to make announcements.

At stations, stops and on vehicles, electronic display boards or automated audible announcements may continue to announce the scheduled service, even when that service has changed. This can create confusion for all passengers and can be particularly disorientating for consumers with vision, hearing or cognitive impairments, people who have English as a second language and visitors.

Consumers complained that they were unable to obtain accurate or up to date information about transport services due to the limitations of automated information and a lack of manual announcements being made. For example:

- an express train altered to a stopping all stations service did not provide accurate audible or written next stop announcements;

- drivers not making audible announcements when the automated system was not working or when an automated system is not fitted to the vehicle; and
- a lack of consistency in the practice of drivers making audible announcements on trains, trams and buses.

The PTO understands that all operators are working towards creating greater accessibility through compliance with DSAPT, which includes the implementation of automated announcements. What we also know is that even with compliant vehicles or infrastructure; journeys can still be inaccessible if automated systems are out of sync or out of order. This is exacerbated during situations when the operator has made decisions to skip stations or prematurely finish trips prior to the scheduled last stop.

Recently, some operators have implemented new guidelines for their staff about when and how to make announcements to ensure a consistent approach is taken. Others are in the process of identifying new ways to ensure their customers receive the information they need when audible announcements are not available. A number of operators have, or are in the process of, developing technologies to provide consumers with next stop information via smartphones Apps using GPS to complement current announcement protocols, and to increase the accessibility of their services.

Consumers should be able to expect the same standard of announcements regardless of what mode of transport they are using and we believe this can be achieved by having robust policies in place for making manual announcements when automated announcements are not available.

Recommendation 7

Best practice standards for making manual announcements

The PTO recommends that the industry develop, in consultation with key stakeholders, best practice standards for staff when making manual announcements.

The standards should promote consistency across all public transport modes about:

- when manual announcements must be made;
- the format they should be in (verbal and/or written);
- the frequency; and
- the content.

The standards should be implemented within agreed timeframes and should be publicly available.

Recommendation 7a

Regular auditing of manual announcements

The PTO recommends that the industry develop a standardised method for regular auditing of adherence to the above standards.

Auditing should include whether the standards have increased the accessibility of public transport services and increased consumer satisfaction with services.

Signage and information provision

The Victorian public transport network uses signage and visual aids to help consumers travel across the network. These include station and stop information signs, timetables, overhead displays, and maps.

Consumers complained that the information available does not always lead to accessible journeys. Issues raised included:

- bus and tram stop timetable information was too small to read;
- displays at city loop train stations are too high to read;
- the font on displays at city loop train stations was too small to read;
- information was not available in languages other than English; and
- information on websites did not always support screen-reading software.

Operators have advised the PTO that they are committed to increasing the accessibility of information about their services and about the public transport industry as a whole.

One operator is working towards obtaining the Communication Access symbol and endorsement through Scope. Others provide information in many different formats, including large print, audible and video formats.¹¹

Static information provision, such as signs, maps and timetables is of little value to contributing to accessible journeys, if systems or processes to provide real time updates, when there are changes to schedules or services do not complement it.

Communicating changes to schedules, services and infrastructure

Consumers complained that there was a lack of consistent and helpful information provided when there were changes to scheduled services or disruptions on the network.

¹¹ See <http://www.scopevic.org.au> for more information about the Communication Access Symbol.

A lack of real time information was the greatest cause of concern. In particular, consumers complained that:

- the metropolitan train operator regularly displays a 'listen for announcements' message on display boards, and then only used audible announcements to advise of changes to services, including changes to the platform a service would depart from – inaccessible information if you are hearing impaired;
- changes to scheduled services being advised on display boards and not being audibly announced – inaccessible information if you are vision impaired, have low literacy or come from a culturally and linguistically diverse background and cannot read English;
- the centralised contact centre was not always able to provide up to date information about disruptions on the network, how long they were likely to continue and options for using other modes of transport to continue their journey;
- announcements to advise of changes to platforms not providing sufficient time to move between platforms; and
- a lack of appropriately formatted information to alert consumers to planned infrastructure changes, maintenance and/or upgrades, which affects access to services.

A number of operators have introduced specialist roles to work alongside their schedulers to ensure that information about changes to services are immediately communicated through the following channels:

- staff on the ground;
- PTV, as the one stop shop for information about journey planning;
- social media (twitter and Facebook);
- websites; and
- smartphone Apps.

Recommendation 8

Best practice standard for real time information provision

The PTO recommends that the industry develop a best practice accessibility standard for how real time information about changes in scheduled services (including disruptions, delays and cancellations) is communicated. This standard should be used in conjunction with the standard for manual announcements outlined in Recommendation 7.

The development of the standard should include a review of current communication channels used by operators to ensure consistency, comprehensiveness, accuracy and timeliness of the information provided.

In the longer term, the industry should develop a central communication platform to ensure that consumers do not have to access multiple Apps, Facebook pages, twitter accounts or websites to be able to receive real time updates and plan their accessible journey.

The Ticketing System

Paul's Story

Paul felt anxious when myki was introduced. He has an acquired brain injury, which makes it hard for him to retain new information. He was really worried that he would forget to touch his myki on and off every time he travelled and would get fined.

He contacted myki a couple of times to ask what he should do and was eventually advised to go to a city loop train station and someone would help him. When he got there, he was told that there wasn't anyone there who could help him.

By the time Paul contacted the PTO he was very distressed about how he would be able to use public transport with the new ticketing system.

Through our investigation, we found that Paul was eligible for an Access Travel Pass. The pass enables him to travel without needing to touch on and off.

Paul can now travel independently on public transport.

(P2012/1176-1 – Investigation)

The ticketing system - myki

Victoria has introduced a smartcard ticketing system – myki. myki has been fully rolled out in metropolitan Melbourne and is currently being rolled out in regional Victoria.

We received complaints about the accessibility of the myki during its introduction and some of these issues are yet to be addressed. Issues included:

- a lack of targeted information to inform and educate people with disabilities about the ticketing system and how to use it;
- consumers with intellectual disabilities and acquired brain injuries forgetting to touch off at the end of their journey – something they did not have to do under the previous ticketing system – sometimes resulting in them being charged a higher default fare;
- consumers with vision impairments having difficulty using myki ticket vending machines due to the colours and contrasts on the screens;
- consumers with disabilities being unable to purchase a concession myki card at card vending machines as only full fare myki cards are dispensed;
- a lack of information in languages other than English about myki and how to use it;
- the lack of short term tickets and access to emergency travel assistance; and
- a lack of information about access to and entitlements provided by concessions, companion cards and travel passes.

With the introduction of any new system, communication about how it works and what to expect is vital. At the centre of most complaints about myki was a lack of effective and appropriate communication about how the new ticketing system would work and how it was different from the Metcard system that people were accustomed to using.

How information about myki was communicated during the period

During the metropolitan roll out of myki, most of the communication and education was via electronic channels. Information was pitched at the general public and there was insufficient information for consumers with disabilities or those with English as a second language. In our view, this created a barrier to access, which still exists today.

The PTO was able to locate one online myki brochure designed for people with disabilities, produced in 2010. It was located on the Scope website, but was not available on the PTV/myki website.¹²

Information about the new system was largely in written format. Short promotional video clips were available on the myki website and gave audible information about the system however did not include any pictures /footage of how to actually use the myki card. The voiceover information was overlaid with music, making it difficult to concentrate on the messages being provided.

In late 2012, seven new short videos, 'Master your myki' were produced and provided much clearer step-by-step information about how to use myki. It does not appear that there was very widespread promotion of these videos and it appears they have not been widely utilised by people wanting to understand the new system.¹³

Despite the continuing roll out of myki across regional Victoria, these videos are no longer available on the PTV website, but can be accessed on YouTube – if you know where to look.¹⁴

We received complaints during the metropolitan roll out about the lack of accessible and easy to understand information about what the changes meant and how people with disabilities would manage the change in the system.

Of particular concern was a lack of available information for people with acquired brain injuries and behavioural conditions, which made it difficult to learn and retain the intricacies of the new system, including the requirement to touch on and off for each trip.

Consumers also complained that the myki website did not have information in languages other than English, nor were there any references to interpreting services or how to obtain information in other languages.

PTV became responsible for the myki ticketing system on 1 January 2013. Prior to April 2013, myki had its own dedicated website, which now forms part of the PTV website.

The PTV website now provides clear contact information for consumers needing to access information about myki in languages other than English. Although it is noted

¹²See <http://www.scopevic.org.au/index.php/cms/frontend/resource/id/590/> for a copy of the brochure.

¹³We have based our view of the apparent lack of use of these videos on the number of times they have been viewed on YouTube – ranging between approximately 2,000 and 4,700 times in the 8 months since they were loaded.

¹⁴See <http://www.youtube.com/user/mykimate> for the Master your myki videos.

the link to the information has been placed at the very bottom of the homepage and could be placed in a more easily accessible location on the homepage of the PTV website.

Using the system

Consumers complained that myki Card Vending Machines (CVMs) were difficult and confusing to use and created barriers to accessing public transport. Complaints included:

- the colours and contrasts on the CVM screens made it difficult for consumers with vision impairments to purchase or top up their myki;
- translation services on CVMs only catered for three languages other than English; and
- CVMs dispensed full fare myki cards only. Consumers complained that this was discriminatory and resulted in people with disabilities or valid concession entitlements having to purchase a concession myki from a manned train station or a myki retailer – which was not always practical. Consumers complained that they had to take additional steps to use public transport beyond the steps other passengers had to take. Our view is that this is a major barrier to accessibility. We understand from a media report that there are plans to make concession myki cards available at CVMs in the future.¹⁵

Short-term tickets and emergency relief

During the review period the PTO was contacted by Melbourne based hospitals, universities and community agencies about how they would be able to use the new ticketing system to provide emergency travel relief to their clients, given short-term tickets are not available.

In the past these organisations had been able to provide clients with daily Metcards to provide immediate emergency travel assistance. With myki, they would have to spend \$6 for each myki card and then place myki money on the card to enable clients needing assistance to travel. This posed the potential for an enormous cost burden to the organisations, which may have resulted in emergency relief no longer being provided.

Many were concerned both at the lack of consultation prior to the Victorian Government's decision not to implement short term ticketing options under myki, and the fact that they could not get any practical advice when contacting the ticketing authority's call centre about what they should do.

¹⁵See <http://www.theage.com.au/victoria/fare-evasion-blitz-on-trams-buses-20130424-2ie3s.html>

In response to this issue, PTV introduced a Day Pass – a single use paper ticket. Approved organisations and agencies are now able to offer clients a Day Pass as an alternative to using myki.

Had the potential for a reduction in the accessibility of services been identified earlier, an alternative short-term ticket/pass for organisations providing vital emergency travel relief could have been developed and implemented more quickly.

Travel Passes, Concessions and Companion Cards

Consumers complained that at times operator staff did not understand the entitlements conferred under travel passes, concession and companion cards.

Complaints included:

- people being made to purchase an additional ticket despite the person they care for having a valid Companion Card, which entitles the cardholder's carer or companion to free travel on all public transport services; and
- people with a valid Assistance Animal Pass being advised that they are not allowed to travel on public transport with their recognised assistance animal.

Currently operators are provided with a range of documentation about concessions and free travel passes; including advisory notices when new processes or entitlements are implemented; the Victorian Fares and Ticketing Manual and the PTV Pass Office Manual. Operators must then ensure this information is provided to frontline staff and that staff are sufficiently trained to understand, communicate and apply the information appropriately.

Consumers also complained that the application process for some Free Travel Passes was lengthy and very complex and that it was difficult to get practical assistance from the ticketing authority when applying.

The length and complexity of an application process can be a barrier to accessing public transport in and of itself.

The PTO notes that all Free Travel Pass application forms are now available on the PTV website. The forms we reviewed appeared to have been simplified and the information reordered to increase their usability. For example, the Access Travel Pass information and application form is now 20 pages long, down from 33 pages. The personal information required has also been reduced and simplified.

PTV has also developed frequently asked questions relating to Free Travel Passes which are available on its website and which were not available on the previous myki website.

Paul's Story Continued

During our investigation, we found that the application form for an Access Travel Pass is part of a 33 page document. It required personal information from Paul and from his doctor about the nature of his condition.

Paul could not fill out the form himself, as he cannot read or write.

We tried to find an advocacy service to help him apply for the pass. We contacted 10 different agencies and unfortunately, none had the resources to offer immediate assistance to Paul.

We arranged a meeting between Paul and a senior member of staff at the ticketing authority who completed the required paperwork on Paul's behalf.

(P2012/1176-1 – Investigation)

Recommendation 9

An updated guide to myki basics

The PTO recommends that PTV produce an updated, simple and plain English guide to myki basics, using pictorial information to illustrate how to use the ticketing system.

The guide should be made available in a number of formats including printed, electronic and video— including Auslan interpreting and voiceover information.

In producing the guide, PTV should seek input from consumer groups, including those who represent the needs and rights of people with disabilities, those from culturally and linguistically diverse backgrounds, the elderly and young people.

The guide should be promoted on the PTV website and on the websites of all operators to ensure it is widely available and as accessible as possible.

The guide should also be available in languages other than English.

Recommendation 10

All myki brochures to be made available online

All current and future brochures relating to the ticketing system, which are made available at stations, stops and retail outlets should also be made available in electronic format on the PTV website. Brochures should be easy to locate on the website and should be searchable, to increase the accessibility of this information.

Recommendation 11

Standardised Training Module and Ready Reference Guide for Concessions and Travel Passes

The PTO recommends that PTV develop a standardised training module for operators to include in frontline induction training and refresher training, about concession entitlements and passes.

To complement this training, the PTO recommends that a ready reference pocket guide to concessions and travel passes be developed for operator frontline staff to refer to when communicating with consumers and determining what their concession or pass entitles them to.

Recommendation 12

Direct assistance to apply for travel passes

The PTO recommends that PTV explore the possibility of providing proactive and direct assistance for consumers applying for travel passes who do not have the support of a carer or other person who can assist with the application process.

Infrastructure

Stations, Stops & Vehicles

Removal of seats at Flinders Street Station – unintended consequences

Consumers complained to the PTO and to a metropolitan media outlet about a decision by the train operator to remove seats from platforms four and five at Flinders Street Station.

The operator had removed the seats to try to ease congestion on the platforms at peak times – for the comfort and safety of its passengers.

The unintended consequence of doing so was to reduce the accessibility of their services for some of their customers. People with disabilities, the elderly, pregnant women or small children no longer had anywhere to sit and wait for their train and had to stand instead.

Within a matter of weeks, seats were put back on the platforms but in lower traffic areas.

This is a case in point of the need for the industry to value issues of accessibility highly when planning and catering for a growing public transport network.

See below media article for more information:
<http://melbourne-leader.whereilive.com.au/news/story/fight-for-flinders-st-station-seats/>

Infrastructure – Stations, Stops & Vehicles

The accessibility of public transport can be significantly reduced if infrastructure is not safe, functional or in working order. During the review period, consumers complained about design features of infrastructure and potential non-compliance with DSAPT. While some of these issues were beyond the scope of our role and required long-term solutions, many could be resolved, or the impact reduced in the short term, through better communication.

Out of Service

There are many differently designed train stations throughout the network. Access to stations can be via ramps, stairs, lifts and escalators.

Consumers complained that they had difficulty accessing public transport when lifts or escalators were out of service.

It is our experience that generally people accept and understand that there are times when public transport infrastructure cannot be used because it is out of order. Complaints arise however, when alternative solutions for access are not provided or when the information about alternative access is confusing or poorly communicated.

Recommendation 13

Provision of practical and intuitively located 'out of service' advice, through signs and announcements.

Signs and announcements should advise the following:

- that the infrastructure is out of service;
- what is being done to fix the problem;
- the anticipated timeframe for fixing the problem;
- alternative means of accessing public transport services; and
- how to get more information or assistance if needed.

In the instance of train stations with out of service elevators or escalators, which provide the only means of exiting a train station if using a mobile aid, carrying luggage or pushing a pram, announcements / signs should be made:

- on trains at stations located on either side of the affected station so that consumers can consider disembarking at that point;

- on trains prior to stopping at the affected station, to allow passengers to decide whether to bypass the station; and
- at train stations located on either side of the affected station so consumers can make an informed choice about boarding the service.

Southern Cross Station

Consumers complained that Southern Cross Station posed unique accessibility challenges due to the grey colour scale used throughout the station. Consumers with vision impairments found the station was difficult to navigate as it was hard to see the structural poles due to their colour. Consumers suggested that placing high visibility tape around each pole would significantly reduce the problem occurring in future.

PTV and Southern Cross Station have advised that a full disability access review of the station is being currently being undertaken, as a result of meetings with Blind Citizens Australia, Vision Australia and Guide Dogs Victoria.

It is also noted that Travellers Aid provides a highly valued buggy and guidance service to help people navigate Southern Cross Station, increasing the accessibility of the station.

Heather's Story

Heather uses the trains regularly and finds Southern Cross Station difficult to navigate as she has a vision impairment.

Heather finds that the combination of the ground, grey surrounds and grey poles throughout the station difficult to distinguish and potentially dangerous for her.

Heather believes that the use of a contrasting colours or coloured strips on the poles would enable her to move around the station with more confidence.

(P2011/0698 Non Investigation)

Recommendation 14

Consultation with stakeholders prior to changes to infrastructure

Changes to infrastructure, whether it involves colour schemes, seating or major works, should be undertaken following consultation with key stakeholders, to ensure that accessibility is built into the design.

Conclusion

We firmly believe that improvements to customer service and information provision can increase the accessibility of public transport in Victoria.

It is not the only accessibility initiative that operators should consider, however it can provide low cost, practical and achievable solutions in the short term, to complement long-term plans for improvements to infrastructure and vehicle design.

We believe that the industry is now well placed to develop a collective and consistent approach to accessibility, which will be enhanced by implementing the recommendations outlined in this report.

EXCELLENCE

We strive for excellence because we value what we do

INTEGRITY

We are transparent, honest and consistent

LEADERSHIP

We lead through encouragement, guidance and innovation

RESPECT

We treat ourselves and others with dignity

INDEPENDENCE

We are impartial and objective

Closing the Accessibility Gap September 2013

This document is available for downloading from our website.
Please contact us if you require other accessible formats.

Free Call: 1800 466 865

National Relay Service: **TTY users** phone 1800 555 677 then ask for **1800 466 865**

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