



julia
farr
association

**Submission made by Julia Farr
Association**

**Investment in public passenger
transport infrastructure and
services**

ABN: 16 464 890 778

104 Greenhill Road Unley SA 5061

PO Box 701 Unley Business Centre SA 5061

t: (08) 8373 8300 f: (08) 8373 8373

e: admin@juliafarr.org.au w: www.juliafarr.org.au

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The Julia Farr Association (JFA) wishes to make a submission to the Senate Standing Committee on Rural and Regional Affairs and Transport's Inquiry into the investment of Commonwealth and State funds in public passenger transport infrastructure and services.

1.0 PURPOSE

The purpose of our submission is to highlight the need for investment to improve the accessibility of public passenger transport for people living with disability to ensure their contribution to, and participation within, the community.

2.0 INTRODUCTION

The Julia Farr Association (JFA) and its predecessor organisations have been involved with the disability community for 130 years. The organisation holds that the following values should inform policy development in this area:

- Personal authority – where people living with disability have and exercise control over the decisions in their lives;
- Social inclusion – where people living with disability are included as active citizens in the life of the wider community;
- Capacity-building – where people living with disability, through access to experiences and support, are growing their capacity to enjoy active lives of choice. This also includes the wider community growing its capacity to be inclusive and supportive of people living with disability.

JFA is not a service provider, nor an advocacy agency, has no political affiliations, and is not Government-funded. As such, we feel we are in a good position to offer comment and analysis without vested interest.

JFA, through enquiry and networking in the disability community and the wider community, seeks to foster innovation, share useful information, and identify and promote policy and practice that may be helpful in improving the life chances for people living with disability.

JFA believe that the inquiry into the investment of Commonwealth and State funds in public passenger transport infrastructure and services is timely in the current environment where there is a strong national push for all Australians to have universal access and involvement in society through the Social Inclusion Agenda¹, and international emphasis on the rights of people to have equal access to

¹ Australian Government 2008, *Social inclusion principles for Australia*, viewed 5 February 2009, <<http://www.socialinclusion.gov.au/NR/rdonlyres/EC6E44A6-C175-4A99-B712-A0AA3759533B/25296/SocialInclusionPrinciplesforAustralia.pdf>>.

transportation through the UN Convention on the Rights of Persons with Disabilities and Optional Protocol². The inquiry provides the opportunity to assess ways in which public passenger transport can further reflect the rights, and enhance the active participation of people living with disability.

3.0 DEMAND FOR ACCESSIBLE PUBLIC PASSENGER TRANSPORT

In 2003, 3.9 million Australians were living with disability (20% of the population), of which 1.2 million were living with a severe or profound limitation. 53% of people in this category required assistance with transport³.

In 2003, 3.35 million people were aged 60 years and over (17% of the population), of which 19% had a severe or profound limitation. A common area of need for people aged 60 years and over was assistance with transport⁴.

These statistics highlight the extent that people living with disability and those who are ageing require transport that meets their needs. It is expected that the percentage of population that require such assistance will increase in the future as the "Australian Bureau of Statistics forecasts that 27.1% or 7.16 million people will be over 65 years of aged by 2051. This represents an increase of 189% when compared to the number in 2002"⁵. This provides a considerable challenge for investment in public passenger transport in the coming years.

4.0 WHY ACCESSIBLE PUBLIC PASSENGER TRANSPORT IS IMPORTANT

Accessible public passenger transport is important to people living with disability as it supports their active participation in the social and economic life of the community⁶. Many people living with disability are reliant on accessible public transport to enable them to keep in touch with family and friends, access essential services when required, work, study and participate in and contribute to community life. The availability of accessible public transport not only benefits people living with disability but assists other members of society such as those who are elderly and families who use strollers.

² United Nations n.d., *Convention on the rights of persons with disabilities and optional protocol*, viewed 3 February 2009, <<http://www.un.org/disabilities/documents/convention/convoptprot-e.pdf>>.

³ AIHW 2007, *Australia's welfare 2007*, Cat. No. AUS 93, AIHW, Canberra.

⁴ ABS 2003, *4430.0. Disability, ageing and carers: Summary of findings*, ABS, Canberra.

⁵ Nicholls, D 2007, *Transporting the wheelchair dependent – A review of the wheelchair accessible taxi industry*, The Australian National University, ACT, p. 21.

⁶ The Allen Consulting Group 2008, *Review of the disability standards for accessible public transport. Draft report*, viewed 3 February 2009, <<http://www.ddatransportreview.com.au/downloads/ACGTransportReviewDraftReport.pdf>>.

5.0 SUBMISSION STRUCTURE

The submission will discuss the following modes of public passenger transport:

- Taxis;
- Planes;
- Buses;
- Trains.

6.0 TAXIS

6.1 Availability of accessible taxis for people living with disability

Allen Consulting Group, as part of their review of the 2002 Disability Standards for Accessible Public Transport, estimated that in 2007 accessible taxis “accounted for ten percent of Australia’s taxi fleet”⁷, or a total of 1711 accessible taxis. This does not meet the transport demands of 636,000 Australians living with disability, i.e. 53% of 1.2 million requiring assistance with transport³.

In South Australia the availability of accessible taxis is even less with a total of seven percent, or 83 accessible taxis out of a pool of over 1,100 taxis. This is a very small number to accommodate over 105,000 people living with disability who have a severe or profound core-activity limitation (14% of 2003 South Australian population)⁸.

The limited availability of accessible taxis creates barriers for people living with disability, affecting their capacity to participate inclusively within the community.

6.2 Experiences of accessing taxis by people living with disability

For many people living with disability, accessible taxis provide them with the only means of accessing the community as they are unable to use other means of public transport⁶. With such a reliance on taxis, people living with disability can experience severe social disadvantage if they are unable to access taxis when required because it stops them accessing opportunities to engage in their local community and in the economy. JFA has identified

⁷ The Allen Consulting Group 2008, *Review of the disability standards for accessible public transport. Draft report*, viewed 3 February 2009, < <http://www.ddatransportreview.com.au/downloads/ACGTransportReviewDraftReport.pdf>>, p. 42.

⁸ ABS 2004, 4430.0 – *Disability, ageing and carers, Australia. Summary of findings – State tables for South Australia*, viewed 3 February 2009, < <http://www.abs.gov.au/AUSSTATS/abs@.nsf/DetailsPage/4430.02003?OpenDocument>>.

through qualitative research⁹ a range of challenges experienced by people living with disability using accessible taxis in South Australia. Some of the key issues are:

- The lack of reliability of accessible taxis - 52.5% of people experienced delays in the time they were picked up by accessible taxis, with a high majority (67%) having to wait from between 30 minutes and two hours to be picked up¹⁰. In some cases people reported waiting up to three hours for their taxi to arrive, and with taxis not arriving on occasions¹¹;
- Restricted opportunity to use accessible taxis due to their extensive use for school pick up and drop offs^{10 11};
- Having to book in advance with no guarantee of being picked up on time¹⁰;
- Concerns that taxi drivers are not being provided with training to support the needs of people living with disability¹⁰.

All these personal examples highlight the extent that people living with disability in South Australia are being discriminated against and disadvantaged by a taxi system that is not being responsive to their needs.

In a society where the general public are not confined by such circumstances, due to having the freedom to choose from the full range of taxis available, it can be argued that people living with a disability are experiencing a form of social apartheid by being excluded from the majority of taxis.

6.3 Progress since the introduction of the 2002 Disability Standards for Accessible Public Transport – Accessible Taxis

In 2002 the Disability Standards for Accessible Public Transport (Transport Standards) were developed under the 1992 Commonwealth Disability Discrimination Act to respond to the need to remove discrimination in the provision of public transport to people living with disability⁶. The Transport Standards stipulate minimum guidelines in regards to taxi boarding ramps, doorways and space within taxis for people in wheelchairs to manoeuvre, and also specifies that by 31 December 2007 accessible taxi response times are to be the same as for other taxis¹². It is acknowledged that since the

⁹ JFA qualitative research with people across the South Australia disability community has included feedback from the [tell us](#) survey, where over 780 people provided information about their experiences living with disability issues, and 40 responses from the JFA Access Cab Log survey conducted in 2008.

¹⁰ Julia Farr Association 2009. 'Access cab experiences in South Australia – Draft preliminary report', Julia Farr Association, Unley, South Australia.

¹¹ Julia Farr Association 2008, '[tell us](#) survey – Draft preliminary report', Julia Farr Association, Unley, South Australia.

¹² *Disability Standards for Accessible Public Transport 2002 as amended* (Commonwealth), electronic version, viewed 6 February 2009,

development of the Transport Standards, state governments have put measures in place. Although the specific approaches adopted by each state have varied, there have been some common areas of focus, such as:

- Providing accessible taxi licences and leases at a discounted and reduced rate in comparison to standard taxis;
- Increasing the period of years accessible taxis can be on the road before requiring replacement, which is longer than standard taxis;
- Providing drivers with bonuses for assisting people living with disability to get in and out of taxis and for arriving at bookings within a certain period of time⁵.

It appears that such measures have only had a minimal impact on the number of accessible taxis available for people living with disability, with research showing across Australia a small increase from an estimated seven percent in 2001 to ten percent in 2007⁶.

One of the apparent key deterrents for purchasing and operating an accessible taxi is that it is not financially viable despite a range of incentives being offered¹³. In research conducted in Dublin it was found that providing licences at reduced costs “does not provide sufficient incentive, by itself to encourage either entry or retention in the wheelchair accessible taxi market. This is because the economics of purchasing and operating such a vehicle quickly erode this concession”¹⁴. The same research found that the annual operating costs for an accessible taxi are estimated to be nearly 25 percent more than standard taxis.

Such disincentives to purchasing and operating accessible taxis highlight the need to look at other means to address the current and future demand for accessible taxis in Australia.

6.4 Recommendations

As legislated through the Disability Standards for Accessible Public Transport 2002, all public transport services (except trains and trams) are to fully comply with relevant Standards by 31 December 2022¹². This provides the opportunity now to consider how best to allocate resources to improve the provision of accessible taxis to people living with disability.

<[http://www.comlaw.gov.au/ComLaw/Legislation/LegislativeInstrumentCompilation1.nsf/0/96EE5ABB923C881ECA256FFE001827AC/\\$file/DisabilityWD02.pdf](http://www.comlaw.gov.au/ComLaw/Legislation/LegislativeInstrumentCompilation1.nsf/0/96EE5ABB923C881ECA256FFE001827AC/$file/DisabilityWD02.pdf)>.

¹³ European Conference of Ministers of Transport 2007, *Improving access to taxis*, viewed 6 February 2009, <<http://www.internationaltransportforum.org/europe/ecmt/pubpdf/07TaxisE.pdf>>.

¹⁴ *Ibid*, p. 58.

R1 Fully accessible “multi-purpose” taxi fleet

We recommend that a fully accessible “multi-purpose” taxi fleet be established to provide people living with disability with greater choice and opportunity to be included in the community through reducing:

- Taxi response time as a result of more taxis being available;
- The need for people to call in advance and use specialist booking services, providing them with the opportunity to hail taxis when required.

The creation of an accessible “multi-purpose” taxi fleet would ensure that the taxi industry is able to fully accommodate the diverse needs of all members of the community.

This is achievable, as demonstrated in the United Kingdom where there has been a dramatic increase in the availability of accessible taxis since the introduction of the Disability Discrimination Act 1995 which legislates that all taxis be wheelchair accessible with full compliance by 2020⁵. In 2005, close to “30,000 taxis – or half the fleet – in England are purpose built taxis which are designed to be wheelchair accessible with assistance from drivers. Of that number almost 21,000 are based in London, where the entire taxi fleet is wheelchair accessible”¹⁵.

R2 Investment in awareness training for drivers and taxi sector

It is important that taxi drivers are provided with disability awareness training as “[n]o matter how well the vehicle is designed, a taxi journey for a disabled person can be ruined by inappropriate behaviour or actions of the driver”¹⁶. Training should also apply to others involved in the taxi industry and be provided periodically to ensure continued awareness of the needs of people living with disability.

We recommend investment in training to raise awareness about the different types of disabilities people live with, as well as training on the use of relevant assistive equipment such as ramps and the use of straps. The training will be more effective if it is provided in consultation with people living with disability.

¹⁵ Victorian Equal Opportunity and Human Rights Commission 2007, *Time to respond. Realising equality for people with a disability utilising taxi services*, viewed 12 February 2009, <<http://www.humanrightscscommission.vic.gov.au/pdf/TIME%20TO%20RESPOND%20-TAXI%20REPORT-%20NOVEMBER2007.pdf>>, p. 39.

¹⁶ European Conference of Ministers of Transport 2007, *Improving access to taxis*, viewed 6 February 2009, <<http://www.internationaltransportforum.org/europe/ecmt/pubpdf/07TaxisE.pdf>>, p. 65.

7.0 PLANES

7.1 Experiences of people living with disability travelling by air

A common opinion of people living with disability is that their experiences of accessible air travel have declined over the past five years⁶. This is despite the introduction of the Transport Standards in 2002. The types of issues that have contributed to such experiences are:

- Being required to travel with a companion on flights, resulting in costs being doubled and reduced independence^{17 18};
- Having no guarantee that mobility aids such as wheelchairs, will arrive at the same destination or be received in the same working order^{17 18};
- Refusal to load mobility aids such as scooters on planes due to airlines placing restrictions on the size of mobility aids it can transport^{17 19};
- Being refused access to flights if other people living with disability are already on the flight despite giving prior notice of travel requirements⁶;
- Inadequate staff awareness and training about assisting people living with disability and using equipment such as lifting devices and harnesses⁶;
- Information about the needs of people living with disability provided at booking time not being conveyed resulting in arrangements having to be made at boarding time with no guarantee that trained staff will be available to assist⁶.

The types of issues experienced by people living with disability highlight that a key barrier to access for people living with disability is not necessarily physically accessing planes but the practices and policies adopted by airlines.

7.2 Progress since the introduction of the 2002 Disability Standards for Accessible Public Transport - Travelling by Air

As is the case with taxis, it is a requirement that airplanes and airports are fully compliant with the relevant 2002 Transport Standards by 31 December 2022¹². The extent that this has been achieved is unclear, although it does appear “that people with disability are generally able to access air travel, with exception of routes that operate small aircraft that are excluded from some

¹⁷ Consultation undertaken by Julia Farr Association on the accessibility of public passenger transport, February 2009.

¹⁸ Bailey, B 2007, *Flight closed: Report on the experiences of people with disabilities in domestic air travel in Australia*, viewed 13 February 2009, < <http://www.piac.asn.au/publications/pubs/PIACFlightclosedBooklet.pdf>>.

provisions of the Transport Standards”¹⁹. However, as highlighted by the experiences above, this does not guarantee air travel will be trouble-free due to current policies and systems that are enforced by airlines¹⁸.

7.3 Recommendations

There needs to be a focus on stopping the current airline practices which deny people living with disability equitable and accessible air travel.

R3 Investment in training, so that airline industry policies and practices respond to the needs of people living with disability

We recommend there be a focus on:

- Providing regular disability awareness training to all air industry staff including the importance of treating people “with the respect and dignity afforded to other customers”²⁰ and how to use specialised equipment such as lifting devices. The training will be more effective if it is provided in consultation with people living with disability;
- Giving priority to the loading of mobility aids, such as scooters on flights as required;
- Developing communication processes to make certain that information relayed at booking time is given to all relevant people to ensure that all personal requirements are met in a timely manner upon arrival at the airport to the point where the person arrives at their destination;
- Mandatory monitoring of progress and provision of accessibility measures to ensure consistency within the industry^{18 21}.

R4 Invest in subsidies to assist people living with disability to travel by air

- In situations where people are required to travel with support, introduce subsidies to offset the costs of having to pay for an extra ticket.
- We recommend the expense of damage to mobility aids be met by airlines or “offer low cost insurance to people living with disability to recover these costs”²².

¹⁹ The Allen Consulting Group 2008, *Review of the disability standards for accessible public transport. Draft report*, viewed 3 February 2009, <<http://www.ddatransportreview.com.au/downloads/ACGTransportReviewDraftReport.pdf>>, p. 69.

²⁰ The Allen Consulting Group 2008, *Review of the disability standards for accessible public transport. Draft report*, viewed 3 February 2009, <<http://www.ddatransportreview.com.au/downloads/ACGTransportReviewDraftReport.pdf>>, p. 67.

²¹ PDCA 2007, *Physical Disability Council of Australia submission to Review of the disability standards for accessible public transport 2002*, viewed 12 February 2009, <http://www.pda.org.au/uploads/published_papers/PDCA%20Submission%20to%20DDA%20Transport%20review.pdf>.

²² *Ibid*, p. 3.

R5 Invest in provision of lifting aids on planes to reduce risk of injury to passengers living with disability and airline staff

A lifter called the *Eagle Lifter* has been developed which provides greater safety to people living with disability and airline staff through reducing the need for manual transfers to access planes. Through using the *Eagle Lifter* people are able to access planes in their own wheelchair and be transferred directly to their airline seat. Qantas currently use this lifting device for its commercial jets and smaller commuter planes²³. Background information on the *Eagle Lifter* can be found at:

<http://www.haycomp.com.au/default.cfm?id=82>.

R6 Invest in establishing an airport service specifically designed to assist people living with disability to access airlines

Currently it is a requirement that airlines provide assistance to people living with disability to access their planes. This can create inconsistencies in the assistance provided as staff at different airlines may have differing levels of training and experience in providing the support required⁶. We recommend the establishment of a service at airports that specifically focuses on supporting people living with disability to access any airline. This will ensure greater consistency in the assistance provided through creating a situation where the staff provide regular support to people living with disability and have the necessary training and experience required. This currently is the practice in airports in Canada¹⁷.

8.0 BUSES

8.1 Experiences of accessing buses by people living with disability

Buses are one of the major modes of transportation used within the community⁶ and provide people living with disability with a low cost travel option. However, a number of barriers identified by people living with disability can impact on opportunities to take advantage of this. Some of the key issues are:

- Not having enough wheelchair accessible buses available resulting in reduced opportunities to travel and actively participate in the community^{6 17};
- Not being able to access buses due to bus stops, kerbs and paths being inaccessible^{6 17};
- Accessing a bus service one way with no guarantee it will be accessible on the return trip^{6 21};

²³ Killeen, G 2006, *Wheelchair design and related transport issues*, viewed 26 February 2009, <<http://www.e-bility.com.au/disability-news/wheelchair-transport-safety.php>>.

- Experiencing a lack of awareness from bus drivers about using disability access equipment⁶.

The above examples highlight that being able to access buses involves not only the provision of accessible buses but also accessible bus infrastructure such as bus stops and paths. A focus on improving the accessibility of both areas is essential to ensure that people living with disability have increased opportunities to be actively involved in their community.

8.2 Progress since the introduction of the 2002 Disability Standards for Accessible Public Transport – Access to Buses

According to the 2002 Transport Standards, buses and bus infrastructure are to fully comply with the relevant standards by 2022¹². Many states have increased the number of accessible buses available since the introduction of the Transport Standards with many reporting that they have achieved or exceeded the requirement by 31 December 2007 that 25 percent of buses are accessible⁶. Although this has been achieved, there are still identified barriers to people living with disability freely accessing buses with less progress being made in bus infrastructure.

8.3 Recommendations

There needs to be a focus on making all factors associated with bus travel accessible and inclusive for people living with disability.

R7 Investment in making buses and bus infrastructure accessible

We recommend there be a combined investment in making buses as well as bus infrastructure accessible, as both are necessary to ensure that people living with disability and by association older persons with less mobility, and young families with strollers, are able to freely travel by bus.

R8 Investment in awareness training for bus drivers and operators

We recommend drivers and operators be provided with regular disability awareness training including how to use disability access equipment to assist people living with disability to travel by bus. The training will be more effective if it is provided in consultation with people living with disability.

9.0 TRAINS

9.1 Experiences of accessing trains by people living with disability

People living with disability highlight a range of issues that impact on their capacity to effectively travel by train, for example:

- Inconsistency in the experience and knowledge drivers and other train personnel have about supporting people to board the train^{6 17};
- Having to rely on drivers or other train personnel to remember a person's destination station, to deploy the ramp for people to get off. This does not always occur⁶;
- Allocated spaces not signed appropriately resulting in other passengers using the space^{6 21}.

Such examples highlight the challenges people living with disability experience, from having to rely on assistance from others to get on and off trains.

9.2 Progress since the introduction of the 2002 Disability Standards for Accessible Public Transport – Access to Trains

The train industry have been given an extended period of time to meet the 2002 Transport Standards, with full compliance required by 31 December 2032¹². There has been some improvement since the introduction of the Transport Standards with many states achieving “a high level of accessibility of train carriages (based on measures of physical accessibility), in excess of what is required in the Transport Standards by 31 December 2007”²⁴. This has been achieved through train staff providing direct assistance to people living with disability to board and exit trains using manually-deployed ramps⁶. However, having reliance on such assistance creates issues for people living with disability due to the current lack of consistency in the support they receive.

9.3 Recommendations

There needs to be an emphasis on reducing the need for people living with disability to rely on assistance from others to board and exit trains to ensure equity of access.

R9 Investment in provision of automated or level access on and off trains

Reducing the reliance on assistance from train staff to enter and leave trains is essential in ensuring that people living with disability are provided with the freedom to access trains independently. This can be addressed through creating level access to trains or providing automated or electronic ramps. Below is a link to an overseas example of providing level access to trains.

- In the United Kingdom the ‘George’ platform hump provides level access to trains in their subways –

²⁴ The Allen Consulting Group 2008, *Review of the disability standards for accessible public transport. Draft report*, viewed 3 February 2009, < <http://www.ddatransportreview.com.au/downloads/ACGTransportReviewDraftReport.pdf>>, p. 28.

<http://www.edean.org/pdf/Case021.pdf>.

R10 Investment in awareness training for train industry staff

As is the case with all other modes of public passenger transport, a focus on the provision of regular disability awareness training is essential to ensure that staff are providing the assistance required by people living with disability and are competent in the use of disability access equipment.

R11 Investment in improving signage to ensure that sufficient space is available for people living with disability using trains

10.0 CONCLUSION

JFA asserts that attending to the issues highlighted in this submission, and the resulting recommendations for investment, will provide people living with disability with increased opportunities to participate fully in their community as valued members of society through having good, reliable access to public passenger transport.

We acknowledge that there are financial and structural considerations associated with these recommendations. However, JFA believes that with the increasing demand for accessible public passenger transport expected due to the ageing population, the investment is wise and will assist Australia in achieving its commitment to social inclusion and meeting its obligations under the UN Convention.

Thank you for the opportunity to make this submission. We also welcome the opportunity to have further input to the inquiry, and can meet with you at your earliest convenience. Our independence, our information resources, and our ongoing dialogue with the disability community, mean we can assist you to create a truly responsive and inclusive public passenger transport system for people living with disability, and where the benefits also extend to other demographics within the community, including older people and young families.

11.0 SUMMARY LIST OF RECOMMENDATIONS

Below is a summary of the recommendations provided in this submission.

R1 Fully accessible “multi-purpose” taxi fleet

We recommend that a fully accessible “multi-purpose” taxi fleet be established to provide people living with disability with greater choice and opportunity to be included in the community through reducing:

- Taxi response time as a result of more taxis being available;

- The need for people to call in advance and use specialist booking services, providing them with the opportunity to hail taxis when required.

R2 Investment in disability awareness training for drivers and taxi sector

We recommend investment in training to raise awareness about the different types of disabilities people live with, as well as training on the use of relevant assistive equipment such as ramps and the use of straps. The training will be more effective if it is provided in consultation with people living with disability.

R3 Investment in training, so that airline industry policies and practices respond to the needs of people living with disability

We recommend there be a focus on:

- Providing regular disability awareness training to all air industry staff including the importance of treating people with respect and dignity and how to use specialised equipment such as lifting devices. The training will be more effective if it is provided in consultation with people living with disability;
- Giving priority to the loading of mobility aids, such as scooters on flights as required;
- Developing communication processes to make certain that information relayed at booking time is given to all relevant people to ensure that all personal requirements are met in a timely manner upon arrival at the airport to the point where the person arrives at their destination;
- Mandatory monitoring of progress and provision of accessibility measures to ensure consistency within the industry.

R4 Invest in subsidies to assist people living with disability to travel by air

- In situations where people are required to travel with support, introduce subsidies to offset the costs of having to pay for an extra ticket.
- We recommend the expense of damage to mobility aids be met by airlines or that low cost insurance be offered to cover the cost of repairs.

R5 Invest in provision of lifting aids on planes to reduce risk of injury to passengers living with disability and airline staff

A lifter called the *Eagle Lifter* has been developed which provides greater safety to people living with disability and airline staff through reducing the need for manual transfers to access planes. Through using the *Eagle Lifter* people are able to access planes in their own wheelchair and be transferred directly to their airline seat. Qantas currently use this lifting device for its commercial jets and smaller commuter planes. Background information on the *Eagle Lifter* can be found at:

<http://www.haycomp.com.au/default.cfm?id=82>.

R6 Invest in establishing an airport service specifically designed to assist people living with disability to access airlines

Currently it is a requirement that airlines provide assistance to people living with disability to access their planes. This can create inconsistencies in the assistance provided as staff at different airlines may have differing levels of training and experience in providing the support required. We recommend the establishment of a service at airports that specifically focuses on supporting people living with disability to access any airline. This will ensure greater consistency in the assistance provided through creating a situation where the staff provide regular support to people living with disability and have the necessary training and experience required. This currently is the practice in Canada airports.

R7 Investment in making buses and bus infrastructure accessible

We recommend there be a combined investment in making buses as well as bus infrastructure accessible, as both are necessary to ensure that people living with disability and by association older persons with less mobility, and young families with strollers, are able to freely travel by bus.

R8 Investment in awareness training for bus drivers and operators

R9 Investment in provision of automated or level access on and off trains

Reducing the reliance on assistance from train staff to enter and leave trains is essential in ensuring that people living with disability are provided with the freedom to board and depart the train independently. This can be addressed through creating level access to trains or providing automated or electronic ramps. Below is a link to an overseas example of providing level access to trains.

- In the United Kingdom the 'George' platform hump provides level access to trains in their subways –
<http://www.edean.org/pdf/Case021.pdf>.

R10 Investment in awareness training for train industry staff

R11 Investment in improving signage to ensure that sufficient space is available for people living with disability using trains

For further information about this submission, please contact:

Robbi Williams
CEO
Julia Farr Association
08 8373 8300
admin@juliafarr.org.au