NCOSS response to the TfNSW Disability Inclusion Action Plan

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ncoss
NSW Council of Social Service

About NCOSS

The NSW Council of Social Service (NCOSS) works with and for people experiencing poverty and disadvantage to see positive change in our communities.

When rates of poverty and inequality are low, everyone in NSW benefits. With 80 years of knowledge and experience informing our vision, NCOSS is uniquely placed to bring together civil society to work with government and business to ensure communities in NSW are strong for everyone.

As the peak body for health and community services in NSW we support the sector to deliver innovative services that grow and evolve as needs and circumstances evolve.

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Introduction

NCOSS is grateful for the opportunity to comment on the draft Transport for NSW Disability Inclusion Action Plan 2017-2021 (DIAP). At the outset, we would like to congratulate Transport for NSW (TfNSW) on the four month consultation period, which enabled the community to give considered and substantive input.

While DIAPs are mandated by the *Disability Inclusion Act 2014* (NSW); NCOSS sees these documents as a foundation of 'good business', driving practices that are more inclusive and supportive of the full participation of all people in the community. In this context NCOSS welcomes the significant progress in the current draft. We are very supportive of the focus on specific outcomes indicating the full inclusion of people with disability, both in the TfNSW workforce, and in the vital transport services that TfNSW provides. NCOSS welcomes the identification of specific, outward facing actions against the DIAP's outcomes; as well as the progress in outlining more concrete measurement of performance.

However, there are some significant opportunities for improvement to ensure that the final document is effective in driving its outcomes and objectives. While the move to more clearly identify measurement indicators is very welcome, these need to be more detailed to be effective. Similarly, NCOSS is concerned that there are some crucial actions which are missing, and that some of the actions identified need to be more targeted.

The broad areas of concern that NCOSS has with the draft DIAP include:

- Objectives and actions that use ill-defined language (such as progressively) and do not have set target end-dates or schedules that facilitate effective monitoring of progress,

- actions that do not link explicitly with other relevant policies and processes that TfNSW engages with,

- actions that do not explicitly identify a process by which they will be implemented, and which can then be monitored for progress and impact,

- objectives and actions which do not represent the 'stretch target' that would support the objective to 'go beyond the standards', and

- actions which do not embed the feedback and experience of people with disability into their processes, to help ensure that people with disability are able to genuinely influence the outcomes of the DIAP.

In this submission we will respond in detail, directly to each of the actions and indicators set out under each outcomes area in the draft DIAP. In drafting this submission, NCOSS has drawn on the expertise of our members including, direct input from our Transport Policy Advisory Committee, and contributions from the Physical Disability Council of NSW, Combined Pensioners and Superannuants Association, Carers NSW and the Community Transport Organisation.

Liveable communities

1.1 – Progressively improve accessibility of train stations

- *Continue the roll out of the Transport Access Program across NSW to improve access to stations on the basis of prioritised need.*

  This action is not specific enough to provide a basis for setting a measureable objective, or facilitating monitoring of performance. To be effective this action should align more explicitly with the requirements under the Disability Standards for Accessible Public Transport. Accordingly it should explicitly identify:

  - o an end date for a 100% accessible train station network,
  - o the criteria for the prioritisation of access upgrades, and its public availability,
  - o dates for the development and publishing of a public schedule to achieve full accessibility,
  - o clear indicators of progress against this schedule.

- *progressively upgrade or remove pedestrian level crossings at stations that are not accessible for people with disability*

  This action should be linked directly to a specified target end date, with a timeline against which progress can be monitored.

- *work with local government and other partners to plan a whole of precinct approach to accessibility during station upgrades*

  This action should explicitly recognise the value in providing local government and other partners with a clear long term schedule of transport access upgrades to facilitate better integrations and coordination.

- An action that links the Transport Accessibility Program with upgraded (and more accessible) accessibility information is needed. This action should work to ensure that all network related information includes an indication of the level of accessibility (more detail will be provided in actions related to transport information). Further, this action should have the development, implementation and updating of this network-wide accessibility information included as an indicator.

1.2 – Progressively improve the accessibility of the train fleet

- *Upgrade the present fleet, where possible, to improve accessibility.*

  This action needs to be more specific in identifying a process for examination and implementation of improvement. This should include:

  - o A process for identifying accessibility issues with the current fleet,
  - o possible actions that may be implemented to address,
  - o and set criteria to determine what is 'possible.'

  The process identifying accessibility issues should explicitly address 'usage issues' that effect the practical accessibility of the current fleet, not merely physical issues with the fleet vehicles. This process can then

serve as a basis for evaluating and identifying ways that the existing fleet can be used better to improve 'practical accessibility', and go 'beyond standards' to improve the way people with disability actually experience transport services

1.3 – Progressively improve the accessibility of bus stops

- This collection of actions must be associated with a target end-date by which bus stops will achieve a defined level of accessibility. Ideally with an explicit link to the Disability Standards for Accessible Public Transport. This target date should also have identified milestones by which progress can be assessed, both in this and subsequent DIAPs

- *issue guidelines on bus stop design standards for accessibility and the reduction of barriers*

  This action must include an identified process that monitors the implementation of these guidelines to determine and assess progress.

- *'investigate and develop feasible program to accelerate upgrades to bus stops by councils'*

  This action should identify a specific mechanism by which investigation can be undertaken, such as the creation of an intergovernmental/interagency workgroup to identify practical means of accelerating bust-stop upgrades, with a specified date by which these means should be identified to relevant bodies for implementation.

1.4 – Progressively improve the accessibility of the bus fleet.

- This action should have explicit reference to the timetable set out in the Disability Standards for Accessible Public Transport and include reference to milestones against which progress can be measured.

- This action should also make more explicit reference to ensuring that all of the TfNSW bus fleet, and all bus services contracted or provided on behalf of TfNSW, are progressively upgraded for accessibility according to the required timeline.

- A sub action that creates a process to look at the actual accessibility of the current fleet should be included. In the interests of 'going beyond the standards', It is crucial that the actual experience of people with disability on buses is examined, and that the way vehicles are used is maximising the physical accessibility of vehicles. This process should specifically include examination of 'practical accessibility' measures (practices that can enhance the accessibility of vehicles by altering the way they are used), rather than be limited to physical upgrades.

1.7 – Progressively improve the accessibility of interchanges

- *Continue the roll out of the Transport Access Program to improve access to interchanges and commuter carparks.*

  This action must be explicitly linked to the requirements set out in the Disability Standards for Accessible Public Transport Accordingly it should explicitly identify:

  o an end date for a 100% of transport interchanges,

  o the criteria for the prioritisation of access upgrades, and its public availability,

- o   dates for the development and publishing of a public schedule to achieve full accessibility,

- o   clear indicators of progress against this schedule.

- o   Initiation of a process of co-operation with other government agency partners and local government entities to co-ordinate interchange upgrades with other opportunities to upgrade surrounding and connecting infrastructure. This should include work with local governments, greater Sydney Commission, Department of Planning and Environment, Infrastructure NSW, The Government Architect and other development agencies to ensure integrated planning of transport and linking 'active infrastructure', maximising accessibility and useability.

1.8 – Implement measures to increase access to taxi services by people with disability.

- The first action should be one that explicitly aligns the outcomes and actions of the DIAP with point to point legislation and regulations. This should ensure that policy and regulations demonstrate practical implementation of the actions in the DIAP. This is crucial as NCOSS believes that several of the actions listed under 1.8 are effectively undermined in the recently released Point to Point regulations.

- *Explore options for disability awareness training for all point to point drivers.*

  This action should be strengthened to 'progressively implement' training to improve disability awareness and behaviour of all point to point drivers. This action should involve:

  - o   identification of the start of the process for implementation of driver training and who will be involved,

  - o   a target date for the implementation of driver training and standards in point to point transport,

  - o   links to a monitoring regime to assess the impact of driver training measures in improving delivery of service to people with disability.

- *Investigate ways to apply existing taxi industry incentives, such as the TTSS, to a broader range of services in the future.*

  This action must be expanded to include identification of a process by which the expansion of taxi industry incentives can be investigated, with the nomination of a date by which the process will be completed.

- *Investigate ways to better target subsidies and incentives for improved point to point customers with disability*

  This action should now make specific reference to the upcoming review of subsidies and supports. The action should identify a schedule for implementation of findings and recommendations emerging from the review, and include a process for ongoing monitoring against the outcome objectives of the DIAP

- *Implement electronic payment system for customers using the TTSS*

  This action should explicitly recognise the need to maintain alternative while ensuring that alternative payment methods under the TTSS that ensure continued access and do not effectively discriminate on the basis of access to specific technologies

1.9 – Improve the walking and cycling environment for all users

- This section should include a specific action on identification of relevant processes where improvement of the walking and cycling environment can be influenced. Specific reference to the Greater Sydney Commission, Local Governments, Infrastructure NSW, and UrbanGrowth should be made as part of better integration of active transport linkages (walking and cycling) into local, district and metropolitan planning processes. It is imperative to ensure that all processes work towards more universally accessible and 'seamless' active transport linkages between transport hubs, centres and other infrastructure. Ideally this action would also include a monitoring mechanism that involved TfNSW reporting on involvement in relevant processes, and progress against DIAP outcome objectives.

1.93 – Improve access to transport for people with disability in rural communities

- An action that prioritises train services in rural and regional NSW would be welcome. Trains are the most reliably accessible transport platform for people with disability and limited mobility, and this must be a priority that is considered in the ongoing planning of rural transport services. Retaining existing train services, and even restoring previous services are key to improving access to transport for people with disability.

- An action is required that sets a minimum staffing standard, ensuring staff are available at all rural and regional stations, during all hours of operation. Staffing is a means of ensuring practical accessibility for people with disability, as well as information and security provision.

Accessible systems and processes

2.1 – Accessibility is a performance criteria for public transport products and projects

Refresh business requirements for infrastructure projects to ensure that accessibility goals, which prioritise customer experience as well as compliance with standards, are included in the project scope.

This action should be amended to mandate that refreshed business requirements for infrastructure include explicit demonstration of how accessibility goals prioritising customer experience have been addressed and implemented.

- *Ensure accessibility is considered in planning public transport services*

This action should also include that processes for planning transport services must demonstrate how accessibility has been considered, and what measures have been included to ensure a positive contribution to the DIAPs accessibility outcome objectives.

2.2 – Standards are developed, maintained and updated

- *Continue to develop standards based approaches to delivering accessibility outcomes on all transport modes.*

This action must include the development of specific processes for the continual assessment of performance of all standards against the DIAPs outcome objectives. It is imperative that a standards based approach monitor the actual impact of those standards and ensure that a process for re-evaluation and renewal is in place. In the interests of aligning with an overall objective to 'go beyond standards', this action should also

make reference to standards being a 'baseline' measure subject to continual development towards a 'stretch objective' of universal accessibility.

2.3 – Ensure that contracted public transport services provide accessible services.

• The overall action 2.3 should be amended to more explicitly ensure that contracted services provide accessible services in line with the outcome objectives and actions of the TfNSW DIAP. Accordingly the first sub-action under this heading should be an action requiring all contract service providers to comply with the TfNSW DIAP. This should involve meeting any action requirements and standards implementation relevant to the services they are contracted to provide (For example bus contractors meet bus fleet, staff training, and practical accessibility standards set out in the TfNSW DIAP)

• *Ensure that DIAPs are a requirement of contracts with transport Service providers*

This action should explicitly require that contract service providers have a DIAP that aligns with or exceeds the standards set out in the TfNSW DIAP. This should include a requirement that that actions set out under service provider DIAPs align with, and contribute to the outcome objectives identified in the TfNSW DIAP.

• *Ensure that all contracted transport service providers train their staff about accessibility issues*

This action is inadequate and should be strengthened to ensure that the level of staff training undertaken by contract service providers matches the TfNSW minimum standard of training in accessibility and service provision for people with disability. This action should ensure that contract service providers undertake similar monitoring of staff performance to ensure that training is achieving the intended outcomes. Ideally it would also provide a mechanism for TfNSW to sanction any contract service providers whose staff do not meet set standards of service provision for people with disability.

2.4 – provide contracted alternative transport services for people with disability who are unable to access public transport.

• *Implement service contracts for specialised community transport services for people with disability*

This action must be expanded to explicitly address the significant issues presented by the transition to the National Disability Insurance Scheme (NDIS), and the related changes which have significant potential to impact negatively on the access to transport for people with disability. This should include:

    o recognition of the current level of access to transport, as facilitated by community transport service providers, as the baseline for transport access for people with disability,

    o initiation of a process to identify and quantify the transport needs of people with disability who will not be covered by the NDIS and are likely to have their access to transport impacted by the requirement for full-cost-recovery pricing of community transport service provision. This process should have a set deadline for the recommendation of measures needed to maintain the baseline access to transport for people with disability not covered by the NDIS; and

    o initiation of a related process working with community transport service providers, to develop transition measures that will help to guarantee and build upon the current level of provision of transport services for people with disability, by community transport service providers.

- *Trial three vehicle prototypes with several community transport service providers to evaluate their potential to meet the needs of people with disability.*

  This action should be amended to trial vehicle prototypes as a model for universally accessible transport service provision. A trial of this nature would pilot approaches that go beyond the implementation of minimum standards, and move towards full inclusion of people with disability.

2.5 – Ensure systems and processes are accessible

- *Ensure that the process of applying for passes and concessions is accessible*

  This action should be more explicit, and should refer directly to making the application process universally accessible, including to people with visual and intellectual impairment. This action should also be directly linked to a process whereby accessibility of processes is assessed and evaluated against the overall outcome objectives.

2.7 – Governance and reporting

- *Report on progress of actions in the action plan to ATAC*

  This action should stipulate an identified process tracking progress on the action plan, rather than just simple reporting. This process should specifically look at which actions are contributing to the outcome objectives and which need to be re-evaluated.

- *Reporting on progress of actions in the Action Plan and key accessibility metrics, in TfNSW's annual report.*

  This action should specifically require the reporting on the progress of actions, to indicate how those actions are reflected in any policy or projects implemented by TfNSW or in co-operation with them. For example, the recent release of point to point regulations would have included a specific accompanying document showing how the regulations have addressed and contribute to the relevant DIAP actions.

- *Conduct forums to inform people with disability about implementation of the Action plan*

  This action should explicitly refer to the conduct of forums that are inclusive to all people with disability, and which provide a structured opportunity for feedback regarding progress of implementation.

Accessible customer information technology and research

3.1 & 3.2– provide information about transport services that is accessible to all customers – Offer tailored Journey planning for customers with disability

- An additional action should be included that implements a network-wide accessibility information program that ensures all network information sources include a level of information on accessibility. In making accessibility information more universally available, people with disability are more able to make travel choices flexibly, according to their needs. This information should be designed to:

  - Be linked to the Transport Access Program, and provide accurate information on the relative accessibility of key stations and interchanges on all network material (platform displays and network maps, as well as webpages and hard-copy timetables)

- o Be universally available

- o Potentially use a 'traffic light' key for accessibility that displays a green wheelchair next to stations and interchanges that are regarded as fully accessible, a red wheelchair for those that are completely inaccessible or mostly inaccessible, and an orange wheelchair for those stations and interchanges that have been partially upgraded and are partially accessible

- o This information, and its more universal availability, should be regarded as 'going beyond the standard' and helping to facilitate a transport network that people with disability can utilise transport with confidence and the flexibility that others in the community expect

- An additional action should be included linking progress on the Transport Access Program to more detailed and accessible information on the level of accessibility of 'partially accessible stations and interchanges". This action is crucial in helping to improve the ability of people with disability to make informed and confidence decisions about their transport. This information should include: what platforms have lifts, accessibility of toilets, accessibility of interchanges, and the level of staffing. This information should be included in apps and online, as well as in hard copy where possible.

- An explicit action recognising the need for a diversity of information sources should be included. Particular reference should be made to the need to maintain and upgrade hard-copy information (in the form of timetables and maps), to cater for the needs of people who are unable to access information on other platforms. An inclusive approach to information recognises that there should be no discrimination according to access to technology.

- An action ensuring a guaranteed minimum level of staffing on all stations during hours of operation should be included. The availability of staff is a crucial information enabler, helping to ensure that people with disability are able to utilise transport services confidently, regardless of unforeseen issues that may arise in the course of a journey.

3.7- Monitor emerging technologies and opportunities

- *Conduct ongoing monitoring of the performance of the Opal card and ways that accessibility could be improved*

  This action should be more explicit about a formal process of monitoring and assessment of the Opal card system. NCOSS reiterates concerns that the Physical Disability Council NSW (PDCN) have over the accessibility of the Opal Cards, and the practical accessibility issues that the Opal system has already presented. Accordingly a formal process of monitoring should:

  - o Involve a consultation process that actively seeks out direct feedback from people with disability and their representatives regarding practical experience of the Opal card system, from card application, replacement, re-charging and use on transport,

  - o Explicitly examine the need for staff assistance at recharge points and gates, to assist people with disability who may require assistance tapping on and off, due to issues with height and reach,

o Have a set reporting date where recommendations can be implemented to improve the practical accessibility of the Opal system and ensure that people with disability are able to travel independently.

Inclusive customer service and feedback

4.1 – *Develop and promote a culture of inclusion and customer service among Transport for NSW staff and our transport delivery partners.*

- *provide disability and age awareness training to all staff*

  This action should be strengthened, and be associated with measurable performance benchmarks and progress markers that track the impact of training in improved service to people with disability. Measurable benchmarks could include:

  - o a baseline measure of staff service to people with disability is created, which goes beyond simple metric of number of staff trained. This baseline measure should use input from people with disability and draw on their experiences in the use of transport services,

  - o a mechanism for random testing of staff performance via a 'secret shopper' process is included in staff assessment is a.

  - o A performance target is set, with progress indicators that can be monitored and assessed, and be reported publicly.

- *Provide training for customer service staff in the operation of accessibility equipment*

  This action should be strengthened, and be associated with measurable performance benchmarks and progress markers that track the impact of training on improved service to people with disability. So that:

  - o A baseline measure of staff service to people with disability is created, which goes beyond simple metric of number of staff trained. This baseline measure should use input from people with disability and draw on their experiences in the use of transport services,

  - o Included in assessment is a mechanism for random testing of staff performance via a 'secret shopper' mechanism.

  - o A performance target is set, with progress indicators that can be monitored and assessed, and be reported publicly.

- *Introduce disability awareness training for call centre operators*

  This action should be strengthened, and be associated with measurable performance benchmarks and progress markers that track the impact of training in improvement service to people with disability. So that:

  - o A baseline measure of staff service to people with disability is created, which goes beyond simple metric of number of staff trained. This baseline measure should use input from people with disability and draw on their experiences in the use of transport services,

- o Included in assessment is a mechanism for random testing of staff performance via a 'secret shopper' mechanism.
- o A performance target is set, with progress indicators that can be monitored and assessed, and be reported publicly.

4.2 – increase opportunities for feedback

- In order to capture the experience of people with disability, and identify the practical barriers to inclusive and accessible transport services, there must be an action that specifically seeks out and incorporates any negative feedback and input from people with disability. This should involve:
  - o Identifying any negative feedback provided by people with disability, provided through frontline staff, call centre staff or other feedback and customer complaint mechanisms,
  - o Collating negative feedback from people with disability into categories related to the issues raised,
  - o Tracking and reporting of type and number of negative feedback incidents to ATAC, in progress reports on DIAP implementation, and in TfNSW annual report as a key marker of progress against outcome objectives.
  - o Moving beyond structured 'consultations' as a source for input on the practical experience of the accessibility of TfNSW transport services.

Inclusive employment

5.2 – Representation levels and the recruitment experience

- An action must be included that sets an explicit objective for the employment representation of people with disability. This target must set out the current baseline level of employment representation and identify progress markers, with indicative timings, towards the objective representation. Such an action should link to the other mechanisms under 5.2. Monitoring of progress would then be an effective marker of the success of all actions designed to improve employment inclusivity for people with disability.

Indicators

NCOSS supports the identification of an 'intelligent compliance' approach, which encourages progress towards the stated objective outcomes of the DIAP. It is crucial that the standards and indicators set as part of the DIAP work towards achieving the outcome objectives, not merely compliance with 'the letter of the law'. However, NCOSS believes that such an approach requires indicators that are more detailed, and involve the identification of more specific measurement mechanisms, We outline some possible mechanisms below:

Liveable communities

Provide barrier free end to end journeys for all customers

- This objective must have an explicit end date associated with it.

- The indicator involving customer feedback needs to have reference to a specific measurement and monitoring system that sets targets for feedback, broken down into categories that can be tracked and reported on publicly. Any customer feedback monitoring indicator should have a 'weighting' for negative feedback.

- Customer satisfaction tracking processes should include qualitative data on people with disability using public transport services, as well as those who do not use transport services. This process should incorporate specific feedback from those people with disability not using transport. This feedback would help to identify the practical and perceptual barriers experienced by people with disability, and provide an alternative assessment of implementation of DIAP actions and its success against targets.

- Assessment of 'security' should include statistics on crimes against people with disability on or around transport services. This data should be incorporated into feedback and customer evaluations, to inform continuous assessment of service security as an enabler of the overall inclusion of people with disability

Accessible systems and processes

To build accessibility into our business systems and processes

- This objective must include a specific indicator showing how each business system specifically addresses accessibility, as they are updated and renewed. This indicator could be linked to a requirement that all systems identify how they are addressing, supporting or improving accessibility. Progress could then be indicated by the number of upgraded systems utilising the new standard, and the percentage of the organisations systems that have been renewed, incorporating this measure.

- The indicator involving customer feedback needs to have reference to a specific measurement and monitoring system that sets targets for this feedback. This should be broken down into categories that can be tracked and reported on publicly. Any customer feedback monitoring indicator should have a 'weighting' for negative feedback.

Accessible customer information, technology and research

To provide accessible planning and cutting edge assistive technology

- The minimum mechanisms by which progress on accessibility will be made publicly available must be specified. This should include, as a minimum, TfNSW annual reports, TfNSW website, ATAC, and any other specific reporting mechanisms related specifically to progress of this DIAP.

- Customer satisfaction tracking processes should include qualitative data on people with disability using public transport services, as well as those who do not use transport services. This process should incorporate specific feedback from those not using transport to identify the practical and perceptual barriers for people with disability. This information can then be incorporated as an alternative assessment of implementation of DIAP actions and success against targets. Further, negative feedback relating to accessibility or staff issues for people with disability, should be given a heavier weighting, with the overall tracking of satisfaction having set targets and progress markers as part of the evaluation process.

Inclusive customer service and feedback.

To ensure people with disability will influence the future of transport in NSW

- There needs to be a target for customer service indicators, with progress markers for improvement set that can serve to 'drive' consistent improvement. Without progress objectives, consistent improvement can involve minimal progress, where performance 'beyond the standard' is sought.

- Customer satisfaction tracking processes should include qualitative data on people with disability using public transport services, as well as those who do not use transport services. This process should incorporate specific feedback from those not using transport to identify the practical and perceptual barriers, with this information incorporated as an alternative assessment of implementation of DIAP actions and success against targets.

- The indicator involving customer feedback needs to have reference to a specific measurement and monitoring system that sets targets for feedback, broken down into categories that can be tracked and reported on publicly. Any customer feedback monitoring indicator should have a 'weighting' for negative feedback.

- Consultation with the disability sector for all major projects, is not a sufficient indicator of genuine progress against the stated objective of ensuring people with disability actually influence the future of transport. This indicator must be expanded to include demonstration that all major projects have meaningfully engaged with people with disability, documented what input arose from those engagements, and demonstrated how that input has been incorporated into the project.

Inclusive employment

To become an employer of choice for people with disability

- Increasing the proportion of staff who identify as having a disability is an interim indicator of progress, but has limited value against the objective of becoming an employer of choice. This indicator should include a baseline of number and proportion (including a breakdown into employment categories), a target objective for the end of the current DIAP, and a series of progress goals that can 'stretch' any proportional increase.

Status report, Disability Action Plan 2012-2017

NCOSS notes that the status of many of the actions identified in the previous DIAP is listed as 'implemented' or 'partially implemented'. The role of status tracking is to measure progress of actions, and inform future actions that may be required in subsequent DIAPs. In this context, actions that are non-specific (continue, improve, work with, increase, progressively), and status indications that are overly broad (such as implemented or partially implemented) do not facilitate the detailed assessment that is required to effectively evaluate the contribution that the actions make towards the outcome objectives. NCOSS believes that this is key in formulating the actions and indicators in the current draft DIAP 2017-2021. Accordingly, there is significant value in listing many of the actions from the DIAP 2012-2017 with an *, and providing additional explanatory detail on the status of the action. This could also point to additional or related actions that may need to continue into the

subsequent DIAP, even if the action is current listed as 'implemented'. Actions which would benefit from such an approach include, but are not limited to:

- *2.1 continue to roll out transport access program.*

  Without any specific details, this action, and its listing as 'implemented', serves little purpose. This should be listed as an incomplete or partially implemented action, along with an assessment of specific progress against objectives that were listed at the outset. This particular action highlights the fundamental need for actions that are stated with more objective, measureable goals and progress markers. Such a structure helps ensure that monitoring of their status gives an accurate and functional assessment of progress, and serves as a basis for informing future actions.

- *2.2 Accelerate the delivery of the Transport Access Program by providing states works, with an initial focus on step-free street to platform access at stations*.

  Without any specific details, this action, and its listing as 'implemented' serves little purpose. This should be listed as an incomplete or partially implemented action, along with an assessment of progress against objectives that were identified at the outset. Additionally, it is impossible to know if the approach has 'accelerated' delivery of the Transport Access Program, without an initial schedule with which to compare actual progress.

- *6.1 Review disability awareness training provided by the taxi industry for all taxi drivers*

  Undertaking a review of disability awareness training is not a relevant action contributing to the DIAP objectives. This is particularly problematic if, as is the case here, that review has actually resulted in less drivers of point to point vehicles being provided with a minimum standard of disability awareness training. This action should be listed as 'not implemented', or listed in such a way as to recognise that the action was made redundant or overtaken by other process. It is crucial that the DIAP process recognise when backward steps are taken, and when actual policy and regulatory changes are made (such as in this case) where the objectives and actions of the DIAP were not taken into account. If measurement of progress (and regress) is not undertaken, the value of the DIAP process is significantly undermined.

Conclusion

We thank TfNSW for the opportunity to provide input on the draft Disability Inclusion Action Plan 2017-2021. We look forward to continuing to work with TfNSW towards a community that values and includes all its members.