



Whole of Journey Guide – Disability Reform

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The Bus Industry Confederation

The Bus Industry Confederation (BIC) is the national independent peak body for the Australian Bus and Coach Industry. We represent over 160 bus and coach operators, body, chassis and complete bus manufacturers and suppliers, parts and service providers, professional services, and state bus associations on issues of national importance.

Our membership is becoming increasingly diverse as key energy and infrastructure partners join as we transition the fleet to low and zero emissions. The BIC advocates on behalf of our members to federal, state and territory governments and associated bodies, to ensure the safe and efficient carriage of passengers, along with safe and sustainable operations and supply chains that support the industry.

About Buses

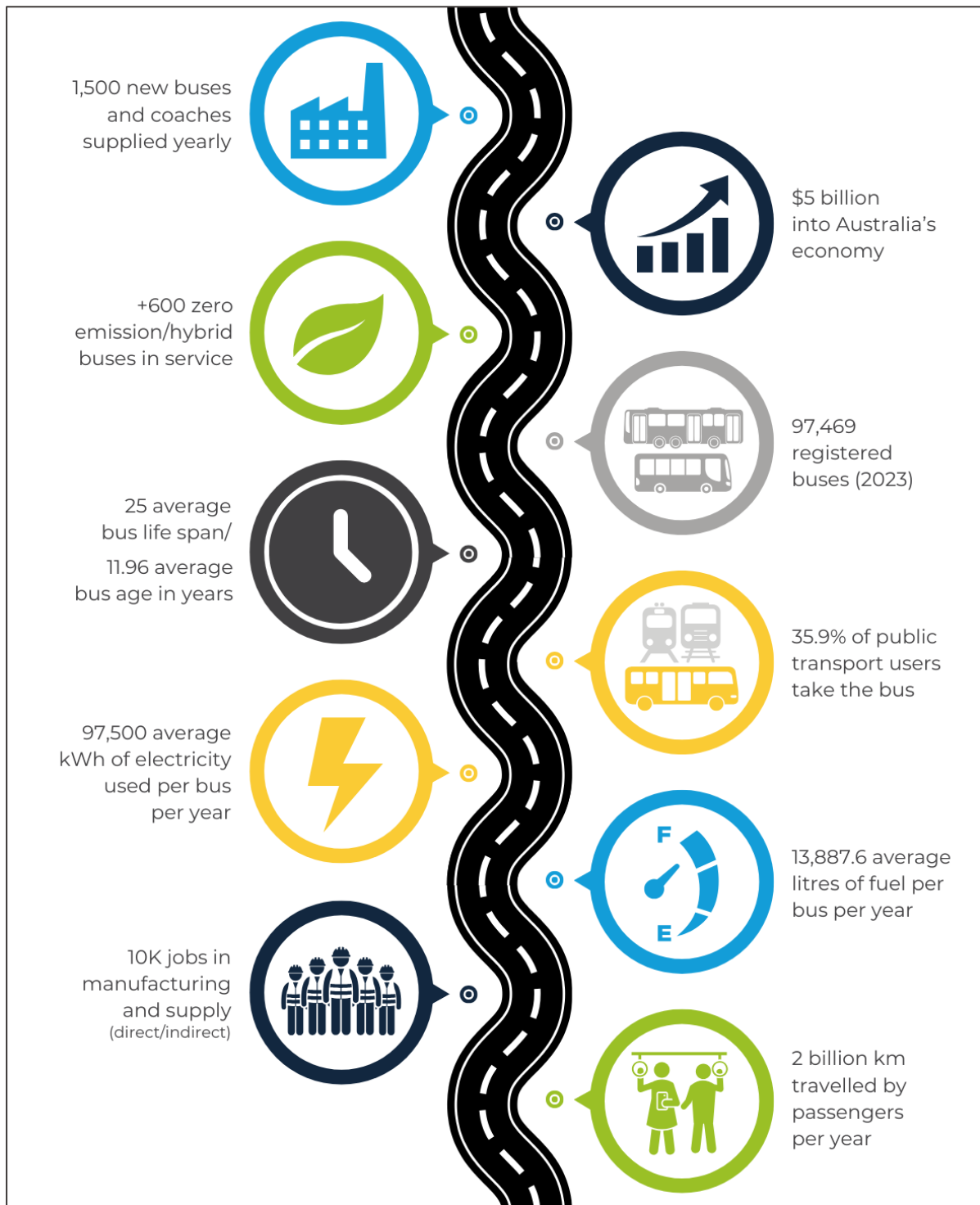
Buses serve as mass transit, delivering benefits like reduced congestion, lower pollution, and enhanced productivity, as well as providing critical social mobility through frequent local routes. These benefits extend to improved public health, lower crime rates and better overall social outcomes, resulting in reduced costs for health and legal systems. The Australian bus industry is uniquely positioned to lead the transition to zero-emission technologies¹. for heavy vehicles, assisting decarbonising strategy for the nation.

Buses have a strong and diverse manufacturing, and supplier presence in Australia providing 10,000 direct and indirect jobs in Australia. This encompasses full manufacturers, assemblers, importers, component manufacturers, suppliers, and importers. We provide an economic contribution \$5Billion yearly to the Australian economy.

Buses provide a cost-effective safe role in moving people from and to their destinations every day, whether it is dense urban outer urban, regional, remote, or interstate. For example, in outer suburban areas, where other mass transit options are scarce, buses are vital in addressing poverty, disadvantage, and the financial strain of car ownership. They offer essential mobility to communities facing isolation, poor services, and socio-economic challenges.

Buses carry more people further than any public transport mode

Industry Snapshot | 2025



Response

The Bus Industry Confederation (BIC) welcomes the opportunity to provide input to the Whole Journey Guide under the Disability Reform initiative.

Introduction

Access to safe, reliable, and consistent transport for people with disability depends on clear responsibilities, shared standards, and practical support for those delivering services. At present, there is often too much responsibility placed on individual bus operators to interpret and implement training requirements, resulting in inconsistency and a lack of clarity. A more effective approach is to strengthen the role of jurisdictions and government bodies in establishing and maintaining common standards, supported by structured, accessible training and guidance.

This approach should include the development of government-led common training programs, covering requirements for bus operators, training for frontline staff who provide services, and capability-building for jurisdictions responsible for setting requirements. In addition, broader education initiatives should support general public awareness and improve understanding among disabled transport users.

Key areas of standardisation should also be addressed, including the development of common rules for securing wheelchair users in vehicles. To ensure accessibility and inclusion, guidance materials should be available in accessible formats such as Braille, and supported through multiple delivery methods, including a regular webinar series.

Overall, a coordinated and standardised approach will reduce duplication, improve consistency across jurisdictions, and deliver a better experience for both users and providers of transport services.

Practical Implementation, Gaps, and National Consistency

1. Clarity and accessibility of the document

The document is generally clear and well structured; however, it is currently too high-level to support practical implementation by operators and frontline staff.

To improve usability, the document would benefit from the development of specific implementation resources, including operator-facing guidance documents and structured training packages. This would ensure that the intent of the guidance can be consistently translated into operational practice.

Accessibility would also be improved through the provision of a Braille-format version of key guidance materials.

A common signage glossary aligned to ISO 7001 standards. These additions would strengthen both accessibility and consistency across jurisdictions.

2. Areas requiring additional information

Several important gaps have been identified where further detail is required to support safe and consistent application:

- **Bus boarding ramp limits**, which are defined in the current DSAPT Legislation section 8.6 but not communicated to the end user. Including information for end user and the physical technical limits of the conveyance will reduce incidences of boarding issues, especially buses.

- **Hearing augmentation systems**, including a defined list of acceptable system types to support consistent installation and use across vehicles
- **Mobility device restraint standards**, requiring a national code of practice and accompanying operator guidance material (identified as a critical gap)
- **Advertising placement on buses**, including a matrix or framework defining acceptable and consistent advertising locations

It is also recommended that jurisdictions responsible for setting vehicle specifications review these areas to ensure alignment with the intent of the guidance.

3. Effectiveness of suggested solutions for people with disability

The proposed solutions are partially effective. While many are well-intentioned, responsibility is at times misallocated to operators for functions that are more appropriately managed at a jurisdictional or government level.

Examples include:

- Timetable scheduling
- Vehicle design requirements
- App-based or system-level accessibility features

These areas would benefit from clearer allocation of responsibility to ensure consistency and system-level accountability.

In addition, passenger education is underemphasised. Greater focus on awareness of invisible disabilities and recognition tools such as the Sunflower lanyard/badge would significantly improve interactions between passengers and frontline staff, leading to a more inclusive and practical transport environment.

4. Likelihood of organisational use of the guidance

In its current form, the document would require further supporting material before it could be effectively implemented by organisations.

To be practically usable, it would need to be supplemented with:

- A simplified operator guideline (e.g. 2-page quick reference guides or brochures)
- A government-led common training framework covering:
 - Operators
 - Frontline staff
 - End users / passengers
 - Nationally consistent standards for wheelchair restraints and signage

A harmonised, nationally led training and standards framework would significantly enhance the effectiveness of the document and ensure consistent application across jurisdictions. It would also better support the intended improvements in accessibility and user experience for both passengers and service providers.

Feedback on Implementation Gaps and Responsibility Allocation

Page 14 – Operator Responsibilities and Consistency of Service

It is stated in the Whole of Journey Guide document that operators and providers should:

- Provide regular staff training on disability awareness and how to support people with disability to ensure a positive journey experience
- Work with other operators and providers to ensure a consistent experience when passengers travel across networks or conveyances

A structured, **government-led training package** and operator guide should be developed to support these requirements. This would provide a clear baseline for operators, frontline staff, and end users, **ensuring consistency across the system**. A consistent passenger experience is best achieved through a shared foundational framework.

Page 15 – Staff Training and Interactions

Section 4.1 notes that regular, high-quality training is critical for all staff, including contractors and security personnel. The Transport Standards require public transport operators and providers to implement role-specific training, developed and reviewed in collaboration with people with disability and delivered by a qualified trainer. This training must be refreshed annually.

It is strongly recommended that government takes a lead role in establishing standardised training courses, ensuring consistency across jurisdictions and operators, rather than leaving development entirely to individual providers.

Page 26 – Braille and Accessibility Knowledge

Training should include the difference between Braille Grade 1 and Grade 2.

Understanding why accessibility tools are important improves practical engagement and strengthens staff capability when working with them.

Page 29-31 – Accessibility Responsibilities Across Networks

We welcome the Guide's recognition that the management of bus stops and surrounding infrastructure falls outside the direct control of operators and is the responsibility of local governments, state agencies, and other landowners.

However, this responsibility should be more clearly led by, government and relevant jurisdictions, with operators supported through consistent standards and coordinated planning.

The Guide encourages operators to work collaboratively with infrastructure owners to improve accessibility. While this is a worthwhile objective, our members' experience indicates that accessibility issues identified at bus stops and surrounding areas are not always addressed, even where operators have raised concerns. In many instances, local governments and other landowners have been unwilling or unable to make the necessary investment required to remediate barriers. For example, many rural areas lack bus stop infrastructure altogether apart from a bus stop sign and that is an area that falls within jurisdictional control.

We therefore consider it would be beneficial to place greater emphasis within the Guide on the roles and responsibilities of infrastructure owners, including local councils and state government agencies, in delivering accessible bus stop environments.

In addition, the Department should consider whether further work is required outside the scope of the Whole Journey Guide to ensure that appropriate investment and accountability mechanisms are in place for local councils, state governments, and other landowners to deliver and maintain accessible bus stop infrastructure.

Page 43 – Bus Boarding Ramp Standards

A significant omission from this section is bus boarding ramps. There is currently no mention of bus boarding ramp weight limits (300kg) in guidance material for users. While this limit exists in DSAPT legislation Section 8.6, the lack of awareness among end users results in boarding issues for wheelchair users where the combined weight of the person and wheelchair exceeds 300kg. This lack of awareness often leads to an uncomfortable experience for the end user and creates difficulties for the operator, who must manage the resulting fallout. This is not a failing of the operator, bus driver, or manufacturer, but a gap in general education directed at the end user.

It is critical end users are made aware of physical constraints of conveyances prior to undertaking a journey to prevent a bad experience before it happens.

Including information for end user as part of their whole of journey experience explaining the physical technical limits of the conveyance will reduce incidences of boarding issues, especially buses.

Pages 47–48 – Hearing Augmentation Systems

Hearing augmentation system types should be clearly listed on conveyances to assist end users.

Where multiple systems are in use, these should be clearly identified through standardised labelling to improve usability and accessibility.

Page 50 – Signage and Wayfinding Standards

A common signage glossary should be developed, aligned with ISO 7001, to ensure consistency and improve the end user experience.

Page 62 – Dwell Time and Safe Boarding

The document highlights passenger feedback highlights safety concerns where buses depart before passengers are seated, resulting in anxiety and risk of injury.

Operators are on set timetable mandates and get fined for being late or not meeting them. These timetables are typically a government-led responsibility. This issue should be addressed primarily through modified timetable design requirements and scheduling systems allowing for greater dwell time and therefore time for people to be seated.,

Page 63 – Invisible Disabilities and Boarding Practice

The document highlights inconsistencies in lowering bus entryways for passengers with disabilities, particularly those with invisible disabilities.

If lowering the entryway at every stop should be standard practice to improve safety and inclusivity. Then, this should be supported by:

- Government-led design and operational standards to include this requirement.
- Allowing additional dwell time at bus stops to allow the bus to lower and then raise again afterwards.
- Public education to improve awareness of invisible (Hidden) disabilities and encouraging recognition tools such as the internationally recognised Sunflower lanyard or badge may also assist in improving understanding between passengers and staff.

Page 67 – Case Study: Bus Signalling App

The concept is supported in principle; however, responsibility should sit with jurisdictions responsible for transport systems and vehicle information infrastructure, rather than individual operators.

Additional dwell time requirements should also be considered in system design.

Pages 68–69 – Mobility Device Restraints

Proposed guidance on minimising mobility device movement is supported but requires further development into a national standard or code of practice.

Key considerations include:

- Orientation of passengers (rear-facing positioning preferred for safety)
- Passive restraint systems that can be self-applied where appropriate
- Recognition of driver safety constraints (e.g. inability to leave the driver position in some cases as risk of personal safety from attack by other passengers)
- Additional dwell time allowances for securement processes
- A consistent national approach is required to ensure safety and uniform user experience.

Including information for end users and the physical technical limits of the conveyance will reduce incidences of boarding issues. Provides a better user experience.

Technical considerations for buses should include:

- Bus movement (turning, kerb strike, acceleration, braking) can cause lateral and directional movement of mobility devices
- Passive containment systems can be implemented to prevent tipping or sliding in all directions but require a standard that isn't present.

A national standard should be developed to address these risks consistently.

Page 72 – Advertising and Accessibility

Advertising on buses can negatively impact accessibility by obstructing external visibility, particularly for passengers with residual vision who rely on landmarks for navigation.

With this being the concern raised by the whole of journey guide, then it is recommended that a standardised matrix for acceptable advertising placement on buses be developed to ensure accessibility impacts are considered in design and commercial arrangements. This would require careful industry, government and end user collaboration

Page 79 – Service Disruptions and Accessible Replacement Transport

The section on service disruptions appropriately recognises the significant impact that disruptions can have on passengers with disability, and we support the underlying principle that replacement transport arrangements should, where possible, maintain accessibility.

However, in practice, the operational realities of delivering bus services in specific jurisdictions mean that operators are not always able to source accessible replacement vehicles at short notice.

The Guide also proposes that wheelchair accessible taxis be provided at the same fare as the disrupted service. While this represents a positive outcome from a passenger accessibility perspective, it raises important considerations regarding funding and cost responsibility for such arrangements.

It is suggested that this section be revised to more explicitly acknowledge these funding implications and to note that implementation of such measures would require further consultation with relevant stakeholders.

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