



**Disability Standard for Accessible Public Transport –
Compliance Action Plan.**

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DSFAPT Action Plan

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DSFAPT Action Plan

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1. Introduction

1.1 Executive Overview

Greyhound Australia is a national company which runs long distance coach services across Australia, provides commercial land based transport services to the mining industry and provides retail and commercial charters services.

Our business is dependent upon our ability to provide safe, friendly, cost effective and reliable services and environments to all our staff, customers and passengers.

This Compliance Action Plan will be used by all areas across our business as a guide to ensure we continue to audit and finetune our environments and business practises to meet our staff and customers expectations and relevant legislations, including the *Disability Discrimination Act* and the *Disability Standards for Accessible Public Transport* (the legislation) (DSFAPT).

1.2 Background

In 2004 Greyhound Australia became the business that resulted from the previous and long standing McCafferty's and Greyhound Pioneer companies. As part of on going streamlining of the business, the fleet, policies and procedures, staff and premises and infrastructure continue to be actively assessed, reviewed and updated to reflect the new requirements and practises. This process continues as a day to day activity for most managers across the Greyhound Australia business.

As a modern and progressive company employing staff and servicing customers across Australia from every walk of life, it has always been in the company's strategy, policy and practise to encourage fairness and a helpful non-discriminatory approach. This *Compliance Action plan* was another opportunity that Greyhound Australia pro-actively undertook to further ensure the requirements of the Disability Discrimination Act were understood and engrained in our business.

Of further specific relevance to our company is the *Disability Standard for Accessible Public Transport* (DSFAPT) which provides specific guidance to Greyhound Australia.

Refer to the Attachments section in this document for specific compliance targets extracted from the Queensland Transport *Important Information for Public Transport Operators and Providers of Infrastructure and Premises* document.

A project team was established in 2007 to facilitate the development and initial execution of the **Compliance Action Plans**. Now, as a part of normal day to day operation, every manager is charged with monitoring, reviewing and maintaining general awareness of the importance of being fair and equal to all customers, passengers and staff.

1.3 Document Purpose

This document provides the:

- opening **Compliance Action Plan** of Strategies and Actions to implement the requirements of the *Disability Discriminate Act* and the *Disability Standards for Accessible Public Transport* (DSFAPT) into Greyhound Australia business, and
- **on-going updates on progress, achievements and impedances** regarding Greyhound Australia's continuing actions to strive to comply with the *Disability Discriminate Act* and the *Disability Standards for Accessible Public Transport* (DSFAPT)

1.4 Definition of Disabilities and Discriminatory Practices

By way of an indicative summary, extracted from various sources acknowledged in the Related Documents sections following:

The *Disability Discrimination Act 1992* (DDA) provides protection for everyone in Australia against discrimination based upon disability. The DDA makes it against the law to discriminate, directly or indirectly against someone if they have a disability or are associated with someone with a disability.

The *Disability Discrimination Act 1992* (DDA) broadly defines “disabilities” to include Physical, Intellectual, Psychiatric, Sensory, Neurological, Learning disabilities, Physical disfigurement and the presence in the body of disease-causing organisms.

DDA provides protection for everyone in Australia against discrimination based upon disabilities as described above. The DDA makes it against the law to discriminate, directly or indirectly. Direct discrimination is when a person is not treated equally (treated unfairly) because of their disability or perceived disability. Indirect discrimination occurs when reasonable changes or adjustments are not made for a person with a disability, or if there are conditions or requirements which disadvantage people with a disability.

DDA protects “everyone” so the Compliance Action Plan includes our staff, customers, business partners and associates.

Also of relevance is the fact that a business could delay, for a period of time, the eliminating of a discriminatory practice if it causes ‘unjustifiable hardship’ to the business to do so.

1.5 Scope

The scope of Greyhound Australia's **Compliance Action Plan** encompasses:-

1. Providing a structured approach towards identifying and systematically removing discriminatory practices from the business, by specifically:
 - a. Integrating DSFAPT into our day-to-day business practices
 - b. Ensuring everyone in the business is aware of DSFAPT

- c. Proactively reviewing and re-engineering our business to comply with DSFAPT
 - d. Monitoring and managing compliance:
 - i. Complaints and
 - ii. DSFAPT initiatives (improvements)
2. Undertaking consultation with relevant external organisations, government and legislative bodies and individuals to promote awareness of Greyhound Australia's efforts regarding the DDA and DSFAPT and to facilitate appropriate changes to achieve and maintain compliance.

1.6 Project Management.

The DSFAPT Management team continues to meet as required, and at least quarterly, to :-

1. **Review progress** and instigate actions towards achieving compliance against the Act and DSFAPT,
2. **Instigate further actions** towards achieving compliance against the Act and DSFAPT,
3. **Review Incident and Issues** that have arisen and required management, using the Incident Management Plan guidelines.

The **DSFAPT Management team** comprise the following :-

- CEO - Chief Executive Office (or nominee)
- COO - The Chief Operating Officer
- National Operations Manager
- National Operations Co-Ordinator
- VP – HR/IR (Human Relations/Industrial Relations),
- National Retail Manager
- National Safety and Compliance Manager
- Call Centre Manager
- VP - Transformation

1.7 Milestones

The significant milestones for this project are:-

Milestone	Target Date
Scope approval	28 th February 2007
1 st Draft of Action Plan	16 th March 2007
Progress review	15 th October 2007
Progress review	15 th November 2007
25% Compliance Deadline	31 st December 2007
Annual review escalating to quarterly in 2011, 2012	
55% Compliance Deadline	31 st December 2012
Annual review escalating to quarterly in 2016, 2017	
80% Compliance Deadline	31 st December 2017
Annual review escalating to quarterly in 2021, 2022	
100% Compliance Deadline	31 st December 2022

Project meeting will be held as required, with formal reviews per the Milestone Timetable above.

1.8 Related Documents

The following in-house documents should be referenced in relation to this Action Plan

1. The Greyhound Australia **DSFAPT Issues & Impedances** document which details the background and relevant aspects of issues or impedances that are influencing Greyhound Australia's efforts to comply with the Disability Standards for Accessible Public Transport.
2. The Greyhound Australia **Incident Management** document which details incidents experienced by Special Assistance Passengers, the circumstances and critically the measures put in place to resolve the situation and reduce the likelihood of the incident reoccurring.

External requests to access these documents can be directed to the Greyhound Australia on 07 3686 0937 and each request will be reviewed on a case by case basis.

1.9 Reference Sources.

The document acknowledges and draws content and references from many sources, the following sources are specifically acknowledged :-

1. Commonwealth Disability Standards for Accessible Public transport 2002.
[http://www.comlaw.gov.au/comlaw/legislation/legislativeinstrumentcompilation1.nsf/0/96EE5ABB923C881ECA256FE001827AC/\\$file/DisabilityWD02.pdf](http://www.comlaw.gov.au/comlaw/legislation/legislativeinstrumentcompilation1.nsf/0/96EE5ABB923C881ECA256FE001827AC/$file/DisabilityWD02.pdf)
2. Queensland Transport - Important Information for public transport operators and providers of infrastructure and premises for compliance with the Commonwealth Disability Standards for Accessible Public transport 2002.
http://www.transport.qld.gov.au/resources/file/eb5d794ff3a3598/Pdf_info_sheet_to_transport_providers.pdf
3. Bus and Coach Operators Guidelines for the Disability Discrimination Act.
<http://www.bic.asn.au/pages/disability.html>
4. Various materials from the Comlaw website.
<http://www.comlaw.gov.au/ComLaw/Legislation/ActCompilation1.nsf/frameLodgmentAttachments/13E9279A2DF4DEFECA2571400008385B>
5. Various materials from the Australia Human Rights & Equal Opportunity Commission website.
http://www.hreoc.gov.au/disability_rights/A-Z_index/a-z_index.html
http://www.hreoc.gov.au/disability_rights/action_plans/Business_Guide/business_guide.html#1
http://www.hreoc.gov.au/disability_rights/standards/www_3/www_3.html
http://www.hreoc.gov.au/disability_rights/standards/standards.html
6. Various Australia Government websites including
http://www.ag.gov.au/www/agd/agd.nsf/Page/Humanrightsandanti-discrimination_DisabilityStandardsforAccessiblePublicTransport#f1

2. Compliance Summary.

As at the last DSFAPT Management team review, as detailed in the *Release History* section on the **Document Information** page, following is a high level summary of Greyhound Australia's progress towards implementing measures to comply with the DSFAPT standards.

It is stressed that a simple review of the key aspects of compliance to the DSFAPT standard can be misleading and misinterpreted.

The Compliance Summary must be reviewed in conjunction with the **Monitoring & Review** achievements which details specific achievements towards DSFAPT Compliance.

Aspect	Compliant %	Issues & Impedances
Express Coaches (Own + Long Term Dry Hire) with accessibility capabilities	53%	Yes
Daily Express Services with accessibility capabilities	44%	Yes
Premises	Majority	Yes
Information and Systems	Majority	Yes

Refer to the **Issues and Impedances** document for detailed explanation of issues that are impacting upon Greyhound Australia's endeavours to achieve DSFAPT compliance.

3. Compliance Action Plan.

Action Plans	
Objective	Description
1.	<p>To improve accessibility to our Premises and Coaches.</p> <p>Our staff, passengers and customers must to be able to access our premises and coaches for us to build and maintain our business.</p> <p>Each vehicle and the many items within each Coach in our fleet are strictly certified and tested against relevant Australia Standards and we are accredited and registered to operate our company accordingly.</p> <p>Many premises we use, namely Roadside Stops, corporate offices and terminals, are leased. We will make the Landlord aware of issues impeding not meeting requirements but we have little autonomy to implement structural changes.</p> <p>However we reaffirm that our paramount interest to provide a safe, comfortable and practical environment for our staff, passengers and customers.</p>

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Strategy and Actions	Description
<i>Strategy 1.a</i>	<i>Progressively upgrade the coach fleet to incorporate the DSFAPT requirements in with the other relevant Australian Standards.</i>
Action 1.a.1	Ensure specifications for new coaches meet the relevant Australian standards including the DSFAPT guidelines.
Action 1.a.2	Develop a works programme to replace or upgrade relevant existing coaches to meet relevant Australian standards including the DSFAPT guidelines.
Action 1.a.3	Commission the new coaches as they are delivered
<i>Strategy 1.b</i>	<i>Progressively audit and update company offices, Terminal and Roadside Stops to meet passenger comfort, safety, access and all relevant standards.</i>
Action 1.b.1	Create Checklists, audit and facilitate upgrades to ensure all Stop(s) (ie Roadside stops and Meal Stops) are suitability for passenger safety, comfort, access, signage, seating, amenities, vehicle parking etc
Action 1.b.2	Create Checklists, audit and facilitate upgrades to ensure all Terminals and Freight offices are suitability for public and passenger safety, comfort, access, signage, seating, amenities, vehicle parking etc Most Terminals are leased areas in larger complexes where structural changes are not available under our lease terms. Additionally, the complex will cover the provisions
Action 1.b.3	Investigate and implement alternate Stops as required
Action 1.b.4	Create Checklists, audit and facilitate upgrades to ensure all Corporate offices are suitability for staff and public safety, comfort, access, signage, seating, amenities, vehicle parking etc While accessibility to Greyhound work areas is not a major issues, there is a need to identify areas where there is an issue and rectify same as required.

Objective	Description
2.	<p>To improve access to our Information.</p> <p>We recognise the importance of our staff and customers being able to access accurate and up to date corporate information.</p> <p>Information in both printed and electronic form will be reviewed and where appropriate re-engineered using the latest technology and standards to ensure our information is accessible.</p>

Strategy and Actions	Description
<i>Strategy 2.a</i>	<i>Progressively review and update electronic booking systems (from websites and outward booking systems) to use relevant technology, reflect the latest branding and meet the standards as defined in the DSFAPT guidelines</i>
Action 2.a.1	Conduct an audit of all electronic information against the DSFAPT information Checklist
Action 2.a.2	Develop a works programme to redevelop electronic business system information required to remain publishable under the standards as defined in the guidelines
Action 2.a.3	Collate and submit 'Unjustifiable Hardship' justifications to the relevant authorities and

	commissions
<i>Strategy 2.b</i>	<i>Progressively review and update printed and supporting electronic information (from Intranets etc) to reflect latest formats, branding etc and meet the standards as defined in the DSFAPT guidelines</i>
Action 2.b.1	Conduct an audit of all printed information against the DSFAPT Information Checklist
Action 2.b.2	Develop a works programme to redevelop and reprint information required to remain publishable under the standards as defined in the DSFAPT guidelines

Objective	Description
3.	<p>Review our Policy's and Procedures.</p> <p>Our business have many employee, customers and passengers spread around Australia and from a wide cross section of the population.</p> <p>It is paramount to us that we ensure our policies and procedures are fair and inclusive to all, irrespective of capabilities and abilities/disabilities.</p> <p>Our policies and procedures will continue to be reviewed on an on-going basis to ensure we meet the principles of the Disability Discrimination Act and that our staff, customers and passengers can work with us to maintain this.</p>

Strategy and Actions	Description
<i>Strategy 3.a</i>	<i>Progressively review and update relevant company Policies and Procedures to meet the standards as defined in the DSFAPT guidelines</i>
Action 3.a.1	Audit and re-work/re-engineer Policy's and Procedures to ensure adherence to the DSFAPT standard as well as their accessibility, readability and correctness.
<i>Strategy 3.b</i>	<i>Provide staff awareness and training programme to ensure all staff are aware of, have access to and have the opportunity to be training in the current Policies and Procedures (Practices) to meet the standards as defined in the DSFAPT guidelines</i>
Action 3.b.1	Investigate mechanisms and practises to provide staff with access to the latest documentation
Action 3.b.2	Implement and issue awareness and training material for all to access the solution
<i>Strategy 3.c</i>	<i>Develop mechanisms to capture, monitor and manage Feedback and Incidents.</i>
Action 3.c.1	Review and re-work (if required) Staff & Customer Feedback (Compliments & Complaints) solution to capture and manage customer feedback
Action 3.c.2	Enhance the Incident Management Plan to alert and manage incidents

Objective	Description
4.	<p>Consult with interested parties.</p> <p>We consider it important that we consult with relevant interested parties to ensure our Action Plan achieves the desired outcomes.</p>

Strategy and Actions	Description
<i>Strategy 4.a</i>	<i>Engage relevant organisations, authorities and interest groups to ensure our company continues to meet the standards as defined in the DSFAPT guidelines</i>
Action 4.a.1	Identify appropriate community and interest groups that can assist in achieving our Action Plans.
Action 4.a.2	Arrange meetings as required to communicate our Action Plans and seek assistance in achieving same.

4. Compliance Monitoring and Reviewing.

This section provides updates on the actions and progress towards achieving the Strategies and Action Items under the **Action Plan** and the on-going re-assessing of outcomes against reasonable expectations and requirements.

Refer to the section titled 'Action Plan' for full details on the Strategies.

Strategy	Description
1.	To improve accessibility to our Premises and Coaches.

-A- Premises and Stops

Outcomes	Actions	Notes
1.a.1	Checklists were created to audit Terminal and Freight Stops for accessibility, signage etc. Audits were conducted and modification, signages have been made whereas we could. In most cases, we are the leaseholder and limited in the structural modifications that can be made.	This is on-going as sites change and staff identify and report issues.
1.a.2	Checklists were created to audit and assess Meal Stops and Roadside pickup stops for safety, accessibility etc. Audits were conducted of the major stops and operational modifications/awareness was actioned. Letters were sent to some Local Councils drawing their attention to the access requirements for our Services stopping in their area.	This is an on-going awareness/assessment activity when Stops change and issues are identified/reported. We are directed or restricted as to where we can physically stop, for example the only Café or Roadhouse in town. The use of the Lifter is impacted by Street furniture, awnings on building at the Stop etc and our Driver will legally park where they can to overcome such issues on a case by case basis.
1.a.3	Greyhound Australia's new Corporate Office in Brisbane is equipped with all the Building and Disability standards relevant at the time.	Building completed and occupied in February 2010.

-B- Coach Fleet

1.b.1	All new Coaches acquired for the Express fleet that were manufacturer after 2002 are all seatbelt equipped and supplied with Australian Standard Certified Wheelchair Lifters suitable for the Vehicle.	<p>All Coach construction/build are strictly certified under Australia Standards.</p> <p>Greyhound Australia will not vary from these standards as safety is our paramount driver.</p> <p>Greyhound continues to be limited in what equipment 'works'/is suitable for the coaches we are acquiring. For example, there is one choice for a Lifter with an extension height of 1.5 metres.</p> <p>Refer to Issues & Impedances for fuller details.</p>
1.b.2	An extra wedge ramp was manufactured and fitted to all Scania 800 services Lifter equipped coaches to reduce the approach angle onto the Lifter platform for wheelchair passengers.	This is more relevant where the coach is not on a flat surface and improves the safety for the Wheelchair occupant.
1.b.3	An extra support plate was manufactured and fitted to select Irizar Wheelchair Lifter equipped coaches to enable wheelchairs to allow wider manoeuvrability across the sunken corridor floor	<p>As previously stated, the fact the corridor was sunken was not an option Greyhound was offered but we have gone that extra step to benefit our special assistance travellers.</p> <p>The fitting of this plate does increase the load/unload time as the plate cannot be fitted while passengers walk along the corridor.</p>
1.b.4	A number of specifically designed loading ramps have been manufactured to enable Drivers to single handedly load a Wheelchair into the Luggage compartment.	<p>Drivers cannot lift more than 20Kg under national Workplace Health and Safety guidelines.</p> <p>The positioning of a Wheelchair in the Luggage compartment for travel is hazardous for persons doing the lifting as they are also required to lift then bend to work under the luggage bin doors and within the confines of the luggage bay.</p> <p>To supply Ramps and the wedges and plates discussed in this section for the whole fleet would be very expensive and like all moveable items, very difficult to guarantee they will be on board when required.</p> <p>This is another reason why we prefer such booking are made through our Call Centre staff to</p>

		<p>ensure all requirements are agreed with relevant Terminal, Operational areas and Drivers.</p> <p>Refer to Issues & Impedances for fuller details.</p>
1.b.5	<p>Greyhound Australia have nominated specific Services as being predictable and reliable 'Easy Access' Services and these offered services will be expanded as more Wheelchair equipped coaches enter the fleet and passenger requirements and logistics support these services.</p>	<p>'Easy Access' services permanently have the 2 seats removed from the Lifter entry into the passenger compartment reducing our saleable seat capacity by 2 seats.</p> <p>The seats weight 45 Kg and are not easily removable en-route due to the lifting restrictions on single Drivers and the limited storage space available in the luggage compartment.</p> <p>Operationally, coaches running these Easy Access services must be wheelchair equipped, and if the nominated vehicle breaks down, then every effort must be made so the replacement vehicle is Lifter equipped. This is very difficult in more remote areas due to the limited fleet of suitable coaches.</p> <p>Refer to Issues & Impedances for fuller details.</p> <p>This supports the need to ensure special assistance travellers book through our Call Centre to ensure travel requirements and conditions are agreed.</p>
1.b.6	<p>A manual Wheelchair was purchased for the Toowoomba – Brisbane service to allow passengers with wheelchairs unsuitable for the Coach Lifter still to be able to travel.</p>	<p>The Coach lifters are weight limited to 300Kg by the manufacturer with a single 'load bearing 'platform on the Lifter.</p> <p>This causes usage restrictions for Wheelchairs over the 300Kg limit, or designed so the weight is not restricted to the 'load bearing platform'.</p> <p>It is not possible to equip every coach with a wheelchair, and as mentioned previously with a moveable item, it is very difficult to guarantee they will be on board when required.</p> <p>Refer to Issues & Impedances for fuller details.</p>
1.b.7	<p>Any used coaches acquired for the Express or Charter fleet are seatbelt equipped but may not be</p>	<p>10 Scania coaches were acquired in 2009 and are not wheelchair</p>

	equipped with Wheelchair Lifters, which is permissible under the Act until 2022.	Lifter equipped. They were manufactured around 1999
1.b.8	The major service events for Wheelchair equipped coaches includes servicing of the Lifters, irrespective of what use the Lifter has had in the interval.	The reliability of the Lifters is an issue. With the distances and road conditions our Easy Access coaches travel, and the limited use the Lifters current experience, continuing reliability issues in the Lifter equipment is a reality.
1.b.9	The Pre-departure checklist for Wheelchair equipped coaches running Easy Access Services now includes the requirement for the Driver to check that the Lifter is operational.	Easy Access services are those services that we reliably and predictably run using a Wheelchair equipped coach. This Pre-Departure check is not consistently done for any other service that co-incidentally runs using a Wheelchair equipped coach.
1.b.10	The SOP for the Wheelchair Lifter has been enhanced numerous times to include new variations in Lifters and improve readability. This SOP is for Drivers and operational staff as a backup or refresher information source to operate the Lifter. All 'Easy Access' coaches have the manufacturer operating instructions for that Lifter on the bin door beside the Lifter.	Many Contract and Charter Drivers will never have had the need to operate the Lifter. Some Drivers may never, or very infrequently drive a Coach equipped with a Lifter. Express Drivers may not have to operate the Lifters for long periods. Drivers have expressed concern about having to operate the Lifter with a SAT pax if they have not had to do so for a lengthy period. Familiarity, confidence and pax well being are the issues. These are some logistical issues that are relevant to our ability to supply special assistance services.
1.b.11	Delivery of training in the "Operation of Wheelchair Lifter" to be conducted in all Operation Bases, Terminals and with Driving staff across the network.	Specifically for the TWB – BNE terminals, Toowoomba IT, Freight, Yard, Tour and Call Centre staff and Brisbane HR and Operations Control staff have received training and refresher training. The Call Centre Supervisors have been given fuller training to provide them with an in-depth understanding of the operation of, limitations of and booking of special assistance travellers. Similar training for Operational and Driving staff continues to be conducted across the network by Ops Managers or the On Road Performance Managers.
1.b.12	The OnRoad Performance Managers (3 positions)	These positions were specifically

	upskill and refresh regional staff in the company policies and operating procedures and practices which includes the familiarity with SAT passenger support	created to standardise operational processes across the country.
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Strategy	Description
2	To improve access to our Information (Systems) .

-A- Booking Systems

Outcomes	Actions	Notes
2.A.1	<p>Research and investigation of changes to the electronic Booking Systems to enhance the ability for unaccompanied children and special assistance travellers to book, and automate the alert to operational areas of a passengers special needs.</p> <p>The aim is to reduce the risk of special assistance travellers not having their requirements met (ie surprise travellers) because operational staff have not been made aware of their travel requirements.</p>	<p>We continue recommending that special assistance bookings are made through the Call Centre so as to ensure the travel requirements and conditions are understood and agreed.</p> <p>All Booking charges/fees are waived for Special assistance travellers.</p> <p>Refer to Issues & Impedances for fuller details.</p>
2.A.2	<p>The Agents on-line site provides all Selling Agents with access to the latest information, policies, terms & conditions.</p> <p>A new version was release in mid/late 2010 to provide added functionality and improve usability.</p>	<p>www.agents.greyhound.com.au is accessible only by registered Users.</p>
2.A.3	<p>The public website was enhanced a number of times to incorporate improved use of modern Internet browser functionality (ie Fonts, enlarging images etc).</p> <p>This was done in conjunction with a major redevelopment of the greyhound.com.au website by an external specialist (SM) to reflect the new branding and marketing initiatives.</p> <p>Reviewed and updated policies and procedures relevant to public customers were incorporated as "links" to enable easy end user upgrades.</p>	<p>This is an on-going activity with a specialist On-Line Co-ordinator responsible for maintaining the public websites.</p>
2.A.4	<p>2009 - Web Reader solutions were trialled against the www.greyhound.com.au website following a customer request.</p>	<p>The trial was not successful and using the products against other high profile travel websites provided similarly unsuccessful.</p> <p>The inbuilt capability within modern Internet Browsers allows font to be varied by the users to meet their requirements</p>

2.A.5	Public website and International website booking system and Special Assistance Traveller eAlert spec designed and developed to link into the Service Manifest to highlight SAT bookings	Passengers who declare their disability have SAT Pax” displayed in the Booking Memo and on the Service Manifest for Services they travel on so alert Terminal and Driving staff of this pax requirement for additional support. A Sat Alert email is also automatically sent to Terminal, Operational Areas involved advising them of the booking.
2.A.6	Considerable investigation has been undertaken on a number of attempts to source an On-Line Training electronic solution to improve training opportunities across the business, improve the speed of distribution of policy and procedure changes and to quiz staff to ensure they were up to date with the latest pertinent information.	3 ‘shrink wrapped’ products evaluated and a recommendation to purchase has been submitted to the LT. Funding constraints prevent progressing at this stage. A shareware product (SharePoint) was trialled, but failed due to complexities in maintaining
2.A.7		

-B- Support Systems

Outcomes	Actions	Notes
2.B.1	The Corporate Intranet continues to be the main on-line electronic source for all policy & procedure documentation. All changes, new documentation etc are loaded to the Corporate Intranet and emails sent to on-line staff, memo correspondence sent to remote staff and distributed via the Drivers pigeon holes.	This suite is maintained by the Human Resources staff who control the source documents used in the Corporate Intranet and the Res Intranet.
2.B.2	The RES Intranet , used by Call Centre staff has been enhanced to include Terminal staff. All Booking procedures, documentation and News are available to all Selling staff.	This suite is maintained by the Call Centre admin staff as required.
2.B.3	Agents are advised of changes to our policies and procedures, product and service changes via a HoundDog notification system. Agents are emailed details of changes and the Agents on-Line system has been enhanced to allow Agents to access current and old Hound Dogs on-line.	Unfortunately, we cannot confirm whether all Agents receive and read all HoundDogs, which can cause issues. Agents can call the Call Centre and the Call Centre Supervisor directly for support at no cost to them.
2.B.4	Special Assistance Traveller (SAT) Alert (and Unaccompanied Child Alert) eforms have been implemented as an additional manual system to ensure all Operational staff are aware of special passengers	This is an additional manual step as backup to other booking processes to ensure all relevant operational staff is aware of the bookings. The public, international and upcoming New Agents booking systems now automatically issue SAT Alert emails thereby reducing dependence on the person doing the booking remembering to issue the Sat Alert.
2.B.5	The Service Manifest used on all Express services	Sat Pax booking and declared

	nationally has been modified to require Drivers to certify they have advised change over Drivers if they are conveying Unaccompanied Children and Special Assistance Travellers to ensure on-going awareness and special attention as required.	condition and Unaccompanied Children are highlighted in the far right column of the Service Manifest to assist the Drivers awareness.
2.B.6	The Incident Management system has alert categories where any incidents regarding the wellbeing of Special Assistance Travellers must be alerted and the incident managed per the IMP.	In most cases, such incidents are escalated to the IMT Team Leader.
2.B.7	A FAQ for passengers travelling with mobility aids document has been developed and enhanced many many times to provide as much relevant information to those travellers. This FAQ is available on our public and Agents websites and Intranet along with the latest terms and conditions and information of relevance to the public.	We acknowledge the input from various external organisations and individuals. This document is an evolving document has been extended numerous times to date.
2.B.8	Our Incident Management Plan and responses are reviewed as required and modified to ensure best practice.	On-going observations and feedback from staff.
2.B.9	A new page titled the Disability Support webpage on Corporate Intranet has been built which contains links and wordage explain all documents relating to the Disability Discriminate Act, DSFAFT, our Action Plan and all supporting documentation and FAQ relating to SAT pax.	This is an evolving webpage and is successfully keeping Disability support in everyone's focus.
2.B.10	A fuller SAT Booking Process has been introduced and all Terminals, Call Centres and Agents advised that booking for passengers travelling with disabilities who require special assistance must be booked through our Call Centre Supervisor.	This will reduce the risk if travel arrangements/expectations are/have not being met due to lack of awareness of requirements. Refer to Issues & Impedances for fuller details.
2.B.11	Development of new software to automatically REMIND originating Terminal and Operational bases of upcoming SAT pax requiring a Coach with Lifter or travelling with a Wheelchair. This system will send a reminder to the Terminals & Operations staff where a SAT pax is originating their travel from....for a nominated number of days prior to travel occurring.	This is in addition to the original SAT Alert email published. This REMINDER is to overcome local staff not remembering a upcoming SAT pax travelling.
2.B.12	A work instruction was developed and published to all Terminal and Operational staff instructing them to set up specific Outlook email Rules & Alerts for SAT pax email alerts	Another means of ensuring local staff stay aware of upcoming SAT pax travelling thru their area.
2.B.13	A new Customer Feedback System has been developed and implemented to better enable all staff to log customer feedback, to generate an automatic response to the Customer advising we have received their feedback and improved reporting to manage resolution of all feedback	Replaces a system that did not have the automated response to customer, nor the level of reporting to identify trends, repeat offenders etc

Strategy	Description
3	Review our Policy's and Procedures.

Outcomes	Actions	Notes
3.1	<p>Documentation has been reviewed and where necessary created or reworded to reflect the DDA and relevant latest company, social and industry requirements. Indicative list includes</p> <ol style="list-style-type: none"> 1. Whistleblower 2. Passengers travelling with Mobility Aids 3. Terms & Conditions of Travel 4. Violent and Aggressive Passengers 5. Counselling and Discipline 6. Training 7. Grievances 8. Equal Employment Opportunities – Affirmative Actions 9. Internal Recruitment 10. Sexual Harassment 11. Workplace Bullying and Harassment 12. Fitness for Duty 13. Policy Statement – Indigenous Australians 14. Customer Feedback 15. Procedure for Investigating Incidents 16. Concessions 17. Social Media Policy 18. National Safety Manual 19. Drivers Manual 20. Terminal manual 	This is an on-going process as documentation and requirements change.
3.2	Policies have been re-affirmed to encourage Chaperones/Personal Assistants to accompany SAT pax and to travel at 50% off and to waive the requirement that Chaperones return on the next available service.	This does expose the company to some abuse as any Chaperones can now travel without return restrictions as this is not enforceable by the Booking system software
3.3	Booking Process documentation has been enhanced to include Step by Step processes for Selling Staff to follow regarding Unaccompanied Children and Special Assistance Travellers.	<p>This is a critical manual step to ensure the passengers and relevant operational staff are aware of the travel requirements.</p> <p>This is also another reason why we prefer such booking are made through our Call Centre staff who have the support available to ensure all requirements are agreed.</p>
3.4	Companion animals to accompany relevant passengers free of charge and operational awareness to facilitate this travel.	<p>Companion Animals must be certified and wear the certifying organisations coat when travelling Under the Transport Operating standards, Greyhound is only permitted to carry certified assistance animals, certified being the imperative.</p> <p>Passengers must present proof that their animal is certified before we can allow travel. This is an additional manual step as backup to other booking processes to ensure all relevant operational staff</p>

		is aware of the bookings.
3.5	The system log-on for all selling staff has been changed to automatically direct them to the RES Intranet so they can be made aware of any new products, news and latest policies, procedures and booking processes.	The RES News is actively managed by the Call Centre Supervisors and is where Terminal and Call Centre staff are able to see latest news, changes to processes etc.
3.6	A Disability Discriminate and Special Assistance Traveller training refresher powerpoint was develop, published to the corporate Intranet and all Operations and Terminal managers directed to ensure all staff are familiar with the topic	This is an evolving document as experience dictates.
3.7	Induction and Safety training documentation enhanced to include special assistance traveller requirements	
3.8	All staff who attend formal training are required to complete a Training Attendance sheet which is held in their file.	This allows improved identification of future training requirements, as well as assists in post incident training planning.
3.9	Driver Inductions includes awareness training for our special assistance travellers.	Regional Operations Managers co-ordinate local training for their new staff. Training may vary depending on local circumstances and positioning of 'Easy Access' coaches.
3.10	Build an Training webpage on the Corporate Intranet and include links to all training documentation and assessment.	
3.12	A FAQ for passengers travelling with mobility aids document has been developed and enhanced many many times to provide as much relevant information to those travellers. This FAQ is available on our websites along with the latest terms and conditions and information of relevance to the public.	We acknowledge the input from various external organisations and individuals.
3.14	A fuller SAT Booking Process has been introduced and all Terminals, Call Centres and Agents advised that booking for passengers travelling with disabilities who require special assistance must be booked through our Call Centre Supervisor.	This will reduce the risk if travel arrangements/expectations not being met due to lack of awareness of requirements. Refer to Issues & Impedances for fuller details.
3.15	The system log-on for all selling staff has been changed to automatically direct them to the RES Intranet so they can be made aware of any new products, news and latest policies, procedures and booking processes.	
3.16	Investigate and assess the implications of joining the Companion system whereby registered Chaperones/Personal Assistance for SAT pax can travel free	Actively investigating the feasibilities and expectations. All Booking fees and charges are waived for Companion travellers and their travelling companion.

Strategy	Description
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DSFAPT Action Plan

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4.	To Consultation with relevant stakeholders.
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Outcomes	Actions	Notes
4.1	2007 - Meeting organised by John Mayo of the Spinal Injury Association to introduce Greyhound Australia to the Cerebral Palsy League, his organisation and relevant others.	
4.2	Discussions with a number of existing passengers in Toowoomba to discuss our plans and seek their advise.	These meetings are on-going and normally occur when the passengers are enroute through the Toowoomba terminal.
4.3	2007 - Awarded the Queensland Transport – Disability Transport Provider of the Year award through a nomination by one of our regular special assistance travellers (DO).	The CEO, COO, VP – HR/IR and VP Transformation attended the Awards ceremony.
4.4	2008 - On-site demonstration of the new Wheelchair Lifters and procedures for Queensland Health in Toowoomba.	
4.5	2008- Assistance to publish an article in the Cerebral Palsy Newsletter by a regular special assistance traveller on his journey on the new 'Easy Access' Service between Toowoomba and Brisbane.	
4.6	2008 - Assistance to publish an article "Thru my Eyes" in the Toowoomba Chronicle on the new 'Easy Access' Service between Toowoomba and Brisbane.	
4.7	2009 - On-site demonstration and on-going correspondence to assist a customer (PD) who is restricted to his chair but wishes to travel on our Easy Access services.	The passenger's wheelchair was too long to actually fit on the 800 Series Lifter.
4.8	Engaged with relevant Government departments and Legislative Bodies to facilitate changes in the legislation to enable Greyhound Australia to better comply/comply with the act.	The legislation relating to Driving Hours, Weight and Measures and passenger safety constrain or prohibit Greyhound Australia from complying with the act. Refer to Issues & Impedances for fuller details.
4.9	Greyhound Australia's COO is a longstanding and respected member of the Transport community both locally and nationally. He actively liaises at all levels of the industry and state government seeking engagement and focus/clarification of issues surrounding the safe transport of special assistance travellers.	For example, the COO is the Chairperson of the Long Distance Coach committee of QBIC (Queensland Bus Industry Confederation). He has driven Coaches on Express services for the company and continues to manage the operational aspects of the company. He is intimately familiar with the principles, practicalities and safety issues surrounding the safe transport of special assistance travellers.
4.10	A number of meetings with various representatives from Queensland Transport to keep them abreast	These meetings are on-going and a normal part of our business

	of our DSPAPT compliance and issues	relationship. There are a number of legislative and practically achievable issues that we continue to seek clarification on. Refer to the section titled "Issues & Impedances" document for fuller details on this subject
4.11	2009 - Discussions with local QT nominee Coach provider (CQ) regarding wording of the FAQ for passengers travelling with a mobility aid regarding restrictions on the number of wheelchair passengers permitted to ride on one service and the requirement to have to tranship from the wheelchair to the Coach seat.	
4.12	Another Presentation to QBIC and members on Greyhounds Issues & Impedances document	Continuing efforts to discover solutions to issues and items hindering Greyhound from meeting compliance on a number of issues.
4.13	Publication of Issues & Impedances document to industry partners	Released by the COO to further industry and government interested parties to further attempt to gain solutions for issues and impedances.
4.14	Liaison with the Qld Department of Community Services	Engaged for a specific incident regarding a non certified Companion Animal.
4.15	Liaison with AHREOC seeking direction on incidents and issues	Engaged a number of times to provide clarify or direction on issues at the time.
4.16	We have engaged a number of remote Indigenous Communities and employed a Community Liaison person in Mount Isa to assist as and when required with indigenous support	

5. Compliance Issues.

An outcome of the on-going business activities is to ensure Greyhound Australia meets or strives to achieve and maintain compliance with the *Disability Discrimination Act* and the *Disability Standards for Assessible Public Transport*.

Any issues and impedances that are encountered will be documented and progressed with relevant interested parties, government departments and legislative bodies.

It can reasonably be expected that resolution of some issues and impedances could happen in iterative steps over time, others may require legislative change and may take considerably more time and some issues may not be achievable.

Whatever the path to resolution, it has been decided to document these issues and impedances in a separate document which can be updated and published in a controlled manner as required.

6. Conclusion.

This DSFAPT Compliance Action plan is a reflection of the on-going efforts Greyhound Australia will continue to follow to ensure our staff, systems, policies and procedures and our communications are fair, open and helpful to all people and parties who interact with our company.

If readers of this document have feedback or specific suggestions that can assist Greyhound Australia in achieving these objectives, then please contact our Corporate Office on 07 3868 0900 or email your comments to easyaccess@greyhound.com.au.

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7. Attachments.

7.1 Attach. 1 – Compliance Target Dates – Public Transport Operators.

Table 2a: Compliance Target Dates – Public Transport Operators (Excluding Taxis)

Reference		Percentage of Compliance Required by Target Date			
Reference in Transport Standards	Part/Number	31 Dec 2007	31 Dec 2012	31 Dec 2017	31 Dec 2022
Alarms	9	100%			
Belongings	30	100%			
Booked Services	28	100%			
Food and Drink Services	29	100%			
Hearing Augmentation	26	100%			
Information	27	100%			
Lighting	20	100%			
Priority Seating	31	100%			
Signs	17	100%			
Symbols	16	100%			
Furniture and Fitments	22	100%			
Handrails and Grabrails	11		100%		
Payment of Fares	25		100%		
Surfaces	10		100%		
Access Paths	2	25%	55%	90% 80% (buses only)	100%*
Allocated Space	9	25%	55%	90% 80% (buses only)	100%*
Boarding	8	25%	55%	90% 80% (buses only)	100%*
Controls	21	25%	55%	90% 80% (buses only)	100%*
Doorways and Doors	12	25%	55%	90% 80% (buses only)	100%*
Manoeuvring Areas	3	25%	55%	90% 80% (buses only)	100%*
Ramps	6	25%	55%	90% 80% (buses only)	100%*
Stairs	14	25%	55%	90% 80% (buses only)	100%*
Toilets (or stops)	15	25%	55%	90% 80% (buses only)	100%*
Passing Areas	4	25%	55%	90% 80% (buses only)	100%*

7.2 Attach. 2 – Compliance Target Dates – Premises & Infrastructure.

**Table 3a: Compliance Target Dates – Premises and Infrastructure Requirements
(Excludes Bus Stops)**

Reference		Percentage of Compliance Required by Target Date			
Reference in Transport Standards	Part/Number	31 Dec 2007	31 Dec 2012	31 Dec 2017	31 Dec 2022
Alarms	19	100%			
Food and Drink Services	29	100%			
Hearing Augmentation	26	100%			
Information	27	100%			
Lighting	20	100%			
Signs	17	100%			
Symbols	16	100%			
Furniture and Fixments	22	100%			
Handrails and Grabrails	11		100%		
Payment of Fares	25		100%		
Surfaces	10		100%		
Gateways	24		100%		
Access Paths	2	25%	55%	90%	100%
Manoeuvring Areas	3	25%	55%	90%	100%
Passing Areas	4	25%	55%	90%	100%
Resting Points	5	25%	55%	90%	100%
Ramps	6	25%	55%	90%	100%
Waiting Areas	7	25%	55%	90%	100%
Boarding	8	25%	55%	90%	100%
Allocated Space	9	25%	55%	90%	100%
Doorways and Doors	12	25%	55%	90%	100%
Lifts	13	25%	55%	90%	100%
Stairs	14	25%	55%	90%	100%
Toilets	15	25%	55%	90%	100%
Tactile Ground Surface Indicators – TGSi	18	25%	55%	90%	100%
Controls	21	25%	55%	90%	100%
Street Furniture	23	25%	55%	90%	100%