

# Transport Access Program

19 FEBRUARY 2019



NEW SOUTH WALES AUDITOR-GENERAL'S REPORT

PERFORMANCE AUDIT

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In accordance with section 38E of the *Public Finance and Audit Act 1983*, I present a report titled **'Transport Access Program'**.

A handwritten signature in black ink, appearing to read 'Margaret Crawford'.

**Margaret Crawford**

Auditor-General  
19 February 2019

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## **Section one**

### Transport Access Program





# Executive summary

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Access to transport is critical to ensuring that people can engage in all aspects of community life, including education, employment and recreation. People with disability can encounter barriers when accessing public transport services. In 2015, there were 1.37 million people living with disability in New South Wales.

Accessible public transport is about more than physical accessibility. It also means barrier-free access for people who have vision, hearing or cognitive impairments. All users, not just people with disability, benefit from improvements to the accessibility and inclusiveness of transport services.

Transport for NSW has an obligation under Australian Government legislation to provide accessible services to people with disabilities in a manner which is not discriminatory. Under the Disability Standards for Accessible Public Transport 2002 (the DSAPT - an instrument of the *Disability Discrimination Act 1992* (the Act) (Commonwealth)), there is a requirement to modify and develop new infrastructure, means of transport and services to provide access for people with disabilities. All public transport operators are required to ensure that at least 90 per cent of their networks met DSAPT by December 2017 and the networks will need to be 100 per cent compliant with all parts of the standards by 31 December 2022. Trains are not required to be fully compliant with DSAPT until December 2032.

The Transport Access Program (TAP) is Transport for NSW's largest program with a specific focus on improving access to public transport for people with disability. The TAP is a series of projects to upgrade existing public transport infrastructure across four networks: Sydney Trains, Intercity Trains, Regional Trains and Sydney Ferries. Transport for NSW established the TAP as a rolling program and, to date, it has delivered the first tranche of TAP (TAP 1) and is completing the final projects for the second tranche (TAP 2). NSW budget papers estimate that by 30 June 2018, Transport for NSW had spent \$1.2 billion in the TAP since its commencement in 2011–12.

After the completion of TAP 1 and TAP 2 (as well as through other transport infrastructure programs), Transport for NSW estimates that 58.5 per cent of the Sydney Trains, Regional Trains and Intercity Trains networks, and 66 per cent of the Sydney Ferries network, will be accessible. To close the significant gap in compliance with the DSAPT target, the objective for TAP 3 is 'to contribute to *Disability Discrimination Act 1992* related targets through DSAPT compliance upgrades'.

The audit assessed whether Transport for NSW has an effective process to select and prioritise projects as part of the TAP, with a specific focus on the third tranche of TAP funding.

In August 2018, at the commencement of this audit, Transport for NSW intended to complete the selection of projects for the TAP 3 final business case in December 2018. Transport for NSW advise that it now intends to complete the development stage and final business case in the first quarter of 2019, prior to the final investment decision of the TAP program. This report is based on the TAP 3 strategic business case and information provided by Transport for NSW up to December 2018.



## Conclusion

**Transport for NSW's process for selecting and prioritising projects for TAP 3 balanced DSAPT compliance goals with broader customer outcomes. It also considered demographics, deliverability and value for money. However, Transport for NSW does not know the complete scope of work required for full DSAPT compliance, and this limits its ability to demonstrate that its approach is effective.**

Transport for NSW has applied most of the external review recommendations from previous funding rounds to the implementation of the third round of TAP funding (TAP3), with positive results. Changes made include a clear objective for TAP 3 to focus on improving compliance, improved governance arrangements, and better consideration of deliverability and design during project planning.

Through TAP 3, Transport for NSW is also trying to better address disability access in a way that balances DSAPT compliance with other considerations – such as population demographics, access to services and value for money. Transport for NSW developed an objective prioritisation and selection methodology to assess projects for TAP 3 funding.

Transport for NSW cannot quantify the work needed to meet DSAPT compliance targets across the rail and ferry networks as it has not completed a comprehensive audit of compliance. This information is needed to ensure the effective targeting of funding, and to measure the contribution of TAP 3 work to meeting the DSAPT compliance targets. Instead, Transport for NSW has undertaken a phased approach to completing a comprehensive audit of compliance across the networks, with a focus on first assessing compliance at locations that are not wheelchair accessible. This creates two problems. First, Transport for NSW does not know the complete scope of work required to achieve DSAPT compliance. Second, not all wheelchair accessible locations fully meet DSAPT standards.

Transport for NSW's proposed communication plan for the schedule of TAP 3 funded works does not align with its Disability Inclusion Action Plan 2018–2022. The Disability Inclusion Action Plan commits Transport for NSW to providing a full list of stations and wharves to be upgraded with their estimated time of construction when the next round of funding, TAP 3, is announced. Given the long timeframes associated with improving transport infrastructure, this information is important as it allows people to make informed decisions about where they live, work or study. Instead, Transport for NSW plans to communicate information to customers on a project by project basis.



## 1. Key findings

**Transport for NSW's prioritisation and selection methodology used balanced criteria to assess projects for the TAP 3 strategic business case**

The TAP prioritisation and selection methodology reflects Transport for NSW's focus on balanced criteria to assess eligible sites which, in addition to wheelchair accessibility, considered:

- patronage and number of services
- related services such as hospitals, schools, aged care facilities and disability services
- population demographics.

We consider this a reasonable approach as had Transport for NSW focussed exclusively on achieving compliance with the DSAPT targets by upgrading the most affordable infrastructure, regardless of patronage, some locations, that are used by more customers, would remain inaccessible to people with disability. However, this approach should not be seen as an alternative to Transport for NSW meeting its DSAPT compliance obligations.



## **Transport for NSW has not completed a comprehensive audit of DSAPT compliance**

An audit across the four networks is necessary to measure the full scope of work needed for full DSAPT compliance. Transport for NSW has undertaken a phased approach to completing an audit of DSAPT compliance, with a focus on assessing locations that are not already wheelchair accessible. Wheelchair accessible locations may not necessarily be fully compliant with the DSAPT and may have other accessibility barriers that impede their use by people with disability.

A comprehensive DSAPT compliance audit would enable Transport for NSW to objectively measure and report on progress in achieving accessibility outcomes for its customers. In its absence, Transport for NSW is unable to outline a strategy to ensure full compliance across the four networks with DSAPT requirements.

## **The prioritisation process considered deliverability, value for money and the impact of delivering other infrastructure**

Reviews of TAP 1 and TAP 2 recommended that Transport for NSW improve how it considered deliverability, value for money and the impact of delivering other infrastructure. Transport for NSW considered these factors by including them as steps in the prioritisation and selection methodology.

Transport for NSW engaged a consultant to undertake economic and financial analysis for all potential sites included in the strategic business case for TAP 3. Transport for NSW considered deliverability, where the impact of other construction work across the network interferes with its ability to undertake work on TAP 3 projects. As part of the prioritisation process, Transport for NSW considered multiple scenarios based on inputs such as value for money, need, and the funding amount available.

## **Transport for NSW applied sound governance and project management in refining the prioritisation process after the strategic business case**

Transport for NSW defines a station or ferry wharf accessible if it is suitable for access by wheelchair users. Accordingly, Transport for NSW's selection and prioritisation methodology excluded wheelchair accessible interchanges from consideration for TAP 3 funding.

We found that Transport for NSW used outdated information during the preparation of the strategic business case and, as a result, assessed 15 regional train stations that were already wheelchair accessible.

After the completion of the TAP 3 strategic business case, Transport for NSW completed on-the-ground investigations at a large proportion of regional locations and found that most locations on the NSW Trains regional network are wheelchair accessible. As a result, Transport for NSW advised that it has refined the prioritisation process for the regional network to refocus on upgrading non-DSAPT compliant locations which align with the Future Transport Strategy 2056 and changes to service delivery.

## **Transport for NSW added four sites to the TAP 3 shortlist after the independent assurance review of the strategic business case**

In 2017, Transport for NSW prepared a strategic business case for TAP 3 that identified 67 locations to proceed to the scoping design phase and for consideration in a final business case. During November and December 2017, Infrastructure NSW conducted the required independent assurance review of the strategic business case.

After the review of the strategic business case, Transport for NSW added an additional four locations following meetings with representatives from the Office of the Minister for Transport and Infrastructure (Minister's office), as follows:

- In January 2018, Denistone, Goulburn and East Hills stations were included in the scoping design phase.
- In April 2018, Clarendon station was added to the scoping design phase.

The reasons for adding these four sites have not been adequately documented by Transport for NSW or the Minister's office.

### Transport for NSW focuses on wheelchair accessibility to measure accessibility outcomes

As part of the selection process, Transport for NSW considered accessibility outcomes to be achieved at the conclusion of TAP 3, such as the number and percentage of wheelchair accessible locations and the percentage of wheelchair accessible passenger trips (across the entire network).

The accessible trip metric, which Transport for NSW publicly reports, is based on the percentage of trips from a wheelchair accessible interchange over the total network patronage. Infrastructure NSW noted in its assessment of the TAP 3 strategic business case that the percentage of non-accessible stops (or journeys) would be higher if the measure considered the stopping location (or destination).

The results of a comprehensive DSAPT compliance audit will help Transport for NSW objectively measure and report on progress in achieving accessibility outcomes for its customers.

### Transport for NSW will not meet the 2022 DSAPT compliance targets

Transport for NSW has acknowledged that it will not achieve the 2022 DSAPT compliance targets. In the TAP 3 strategic business case Transport for NSW expects that, by June 2023, at the completion of upgrades as part of TAP 3 projects, and following progress on other Transport for NSW programs (including Sydney Metro and light rail projects), 78 per cent of stations and ferry wharves will be wheelchair accessible, and 98 per cent of rail and ferry customers will use a wheelchair accessible station or ferry wharf.

### The TAP 3 communication plan does not meet the requirements of Transport for NSW's Disability Inclusion Action Plan 2018–2022

Transport for NSW's Disability Inclusion Action Plan 2018–2022 includes a commitment to publish a list of stations and wharves to be upgraded with estimated time of construction as each new tranche of the Transport Access Program is announced. Given the long timeframes associated with improving transport infrastructure, this information is important as it allows people to make informed decisions about where they live, work or study. The TAP 3 Communication Plan does not include this provision and instead focusses on communication on a per project basis.



## 2. Recommendations

### Within one month of finalising the TAP 3 project list, Transport for NSW should:

1. publish a schedule of stations and wharves that it plans to upgrade as part of TAP 3 with an estimated time of construction for each location.

### By March 2019, Transport for NSW should:

2. ensure decisions on how and why projects are prioritised for funding are recorded and maintained, in compliance with the *State Records Act 1998*.

### By June 2019, Transport for NSW should:

3. develop a plan for a comprehensive audit of Disability Standards for Accessible Public Transport 2002 compliance across all public transport networks.

### By June 2020, Transport for NSW should:

4. complete a comprehensive audit of Disability Standards for Accessible Public Transport 2002 compliance across all public transport networks and publicly report this information
5. improve how it measures, and publicly reports on, accessibility outcomes for people with disability.



# 1. Introduction

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In 2015, there were 1.37 million people living with disability in New South Wales. Access to transport is critical to ensuring that people can engage in all aspects of community life, including education, employment and recreation. People with disability can encounter barriers when accessing public transport services.

The social model of disability, outlined in the United Nations Convention on the Rights of Persons with Disabilities, views people with disability as not disabled by their impairment but by the barriers in the community and environment that restrict their full and effective participation in society on an equal basis with others.

Accessible public transport is more than the provision of physical access to premises and conveyances, it provides barrier-free access for people who have vision, hearing or cognitive impairments. All users, not just people with disability, benefit from improvements to the accessibility and inclusiveness of transport services.

According to the Australian Bureau of Statistics, the main types of difficulties experienced by people with disability when using public transport relate to steps (39.9 per cent), difficulty getting to stops and stations (25 per cent), fear and anxiety (23.3 per cent) and lack of seating or difficulty standing (20.7 per cent).

## 1.1 Disability Standards for Accessible Public Transport

In 1992, the Australian Government introduced the *Disability Discrimination Act 1992* (the Act), which seeks to eliminate discrimination against people with disability. Public transport is a service covered by the Act.

The objectives of the *Disability Discrimination Act 1992* include:

- to eliminate discrimination against people with disabilities as far as possible
- to ensure that people with disabilities have the same rights as everyone else in the community
- to promote recognition and acceptance within the community of people with disabilities and their rights.

In 2002, the Australian Government issued the Disability Standards for Accessible Public Transport (the DSAPT) to assist public transport operators and providers to meet their obligations under the Act. The Act makes it unlawful for any person to contravene a Disability Standard (including the DSAPT). The DSAPT applies to all operators that provide public transport services. These standards also apply to supporting premises and infrastructure. The DSAPT requires public transport services and facilities to become more accessible by:

- replacing or upgrading conveyances, premises and infrastructure
- ensuring that all new public transport services and facilities introduced after the commencement of the DSAPT are compliant.

The DSAPT sets out compliance requirements in relation to (but not limited to):

- access paths
- ramps
- boarding devices
- tactile ground surface indicators
- handrails
- doorways
- controls
- symbols
- signs.

Appendix two includes a comprehensive list of compliance requirements and components of the DSAPT, including target dates for compliance.

According to the DSAPT compliance schedule, transport services and infrastructure should be fully accessible by 2022. Trains should be compliant by 2032. The DSAPT also has progressive interim compliance goals. For example, the DSAPT sets compliance targets for lifts at public transport infrastructure of 25 per cent by 2007, 55 per cent by 2012, 90 per cent by 2017 and 100 per cent by 2022.

## 1.2 Transport for NSW programs to improve compliance with the DSAPT

The *Disability Discrimination Act 1992* and the DSAPT require public transport operators, including Transport for NSW, to provide accessible services to people with disability in a manner that does not discriminate.

Transport for NSW is also responsible for planning and policy across all modes of transport in New South Wales.

There are many programs and projects across the Transport cluster that plan to address compliance with the DSAPT. Appendix six includes a comprehensive list of these programs. Some examples include:

- **Transport Access Program (TAP)** – The TAP program provides infrastructure upgrades to existing train stations and ferry wharves.
- **Sydney Metro (Sydney Metro Northwest, and Sydney Metro City and Southwest)** – Sydney Metro plans to include upgrades to existing stations and the addition of new stations. These upgrades aim to ensure that the stations are fully DSAPT compliant.
- **New Intercity Fleet** – A new fleet of intercity trains featuring dedicated wheelchair space, accessible toilets, and digital screens and announcements.
- **Wayfinding program** – This program focuses on wayfinding upgrades to help customers navigate the public transport system easily and intuitively. Wayfinding includes signage, tactile ground surface indicators, maps, apps, sounds and textures.
- **Parramatta Light Rail and CBD and South East Light Rail** – These new infrastructure projects will introduce light rail vehicles that aim to be fully accessible by meeting the DSAPT and testing prototypes for accessibility.

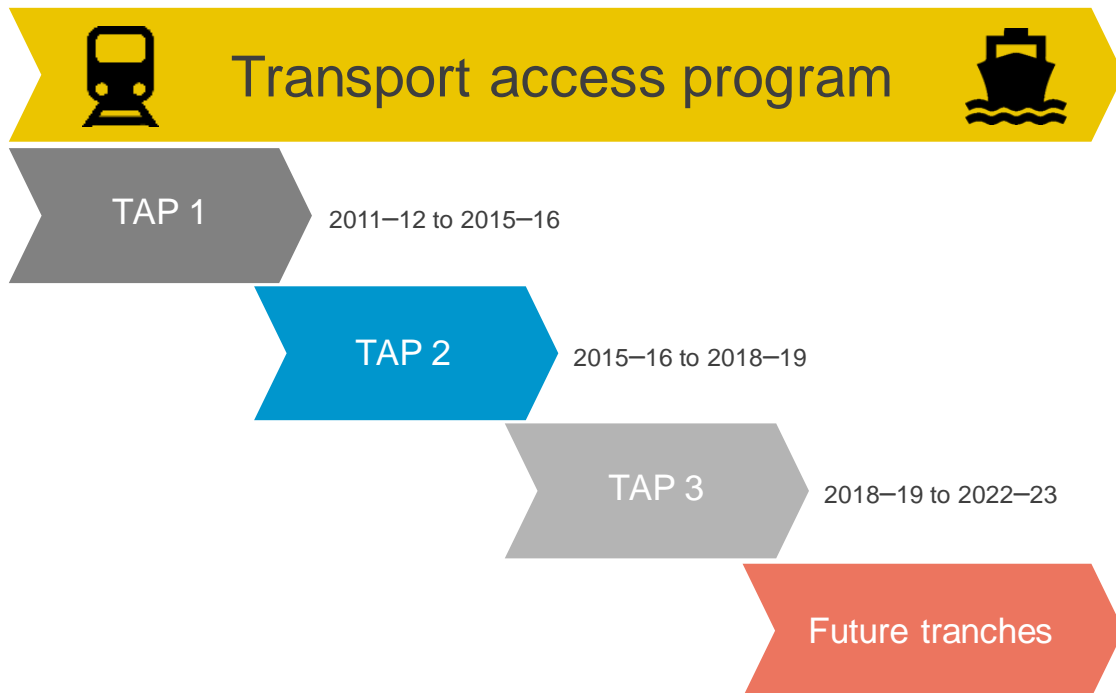
This audit only reviewed the third tranche of the Transport Access Program (TAP 3) and not the other programs and projects outlined above or in Appendix six.

## 1.3 About the Transport Access Program

In April 2012, the NSW Government announced the Transport Access Program (TAP). The TAP is a series of projects to upgrade existing public transport infrastructure across four networks: Sydney Trains, Intercity Trains, Regional Trains and Sydney Ferries. The TAP is focussed on improving and upgrading train stations and ferry wharves. The TAP is the largest program with a specific focus on improving access to public transport for people with disability. Transport for NSW established the TAP as an ongoing program, which Transport for NSW is delivering in tranches. The original purpose of the TAP was to improve access to public transport including, but not limited to, improving compliance with DSAPT. In previous tranches, TAP 1 and TAP 2 also delivered upgrades with wider customer benefits including commuter car parks, station upgrades, wayfinding and signage upgrades and minor works and safety.

Exhibit 1 outlines the funding phases for the TAP, including its first tranche (TAP 1), second tranche (TAP 2) and third tranche (TAP 3). The planning and delivery stages of each tranche of TAP can overlap.

**Exhibit 1: Delivery timeframes for the tranches of the Transport Access Program**



Source: Transport for NSW 2017.

Since 2011, Transport for NSW report it has completed the following as part of the TAP:

- 51 wheelchair accessible station upgrades, and additional accessibility upgrades to a further 20 stations
- upgrades to another 58 interchanges including 18 ferry wharves
- an additional 6,000 new commuter car parking spaces.

At 30 June 2018, NSW Budget papers estimate that Transport for NSW had spent approximately \$1.2 billion on the TAP since its commencement in 2011–12.

In the NSW Budget 2018–19, the Minister for Transport and Infrastructure announced a further investment of \$882 million over four years for the TAP. This included an allocation of \$133 million for spending in 2018–19. Transport for NSW is currently planning the third stage of the TAP, referred to as TAP 3.

**About the audit**

This audit assessed whether Transport for NSW had an effective process to select and prioritise projects for TAP 3. In making this assessment, we considered the following criteria:

1. Transport for NSW uses appropriate criteria to effectively select projects eligible for funding.
2. Transport for NSW uses an effective process to prioritise projects.
3. Transport for NSW has incorporated lessons learnt from previous tranches.
4. The prioritisation and selection processes align with Transport for NSW's Disability Inclusion Action Plan 2018–2022.

The audit did not seek to examine the effectiveness of the first and second tranches of the Transport Access Program or examine issues related to individual project management.



## 2. Lessons applied in TAP 3

### 2.1 Revised objectives for the Transport Access Program

**TAP 1 and TAP 2 only had a partial focus on improving compliance with the *Disability Discrimination Act 1992* (the Act) and the DSAPT**

The intent of TAP 1 and TAP 2 was to support and grow patronage by improving the amenity of public transport for customers, through improvements to safety, facilities (such as commuter car parks and bike sheds) and accessibility. TAP 1 and TAP 2 were also intended to improve compliance with the Act and the DSAPT, but this was not their sole focus. The sub-programs for TAP 1 and TAP 2 are outlined in Appendix three.

Across TAP 1 and TAP 2, projects that related specifically to improving compliance with the DSAPT represented 40 per cent of expenditure. Other customer improvements represented 60 per cent of expenditure.

By July 2019, at the completion of TAP 1 and TAP 2 projects, Transport for NSW estimates that 216 of the 369 (58.5 per cent) stations across the Sydney Trains, Intercity Trains, and Regional Trains networks will be wheelchair accessible. In the Sydney Ferries Network, 24 of the 36 (66 per cent) ferry wharves will be wheelchair accessible.

According to information available on Transport for NSW's website, we estimate that approximately 65.2 per cent of stations in NSW's metropolitan train network are wheelchair accessible. By comparison, all metropolitan train stations in Victoria except for one are wheelchair accessible, while 56.5 per cent in Queensland and 52 per cent in Western Australia are wheelchair accessible.

**TAP 3 is focussed on compliance with the Act and the DSAPT**

In 2016, following multiple external reviews of TAP 1 and TAP 2, Transport for NSW reassessed the intent of the Transport Access Program. Transport for NSW made this decision given the significant compliance gap between the number of accessible locations across the network and the targets set out in the DSAPT. Transport for NSW has acknowledged that TAP 3 cannot solely meet the compliance targets set out in the DSAPT. However, Transport for NSW acknowledge that TAP 3 represents a crucial opportunity to close the gap between the number of accessible locations and the 2022 DSAPT compliance target.

In 2017, Transport for NSW developed the TAP 3 strategic business case. The purpose of a strategic business case is to assess needs and identify options before government makes final decisions about funding. In the TAP 3 strategic business case, Transport for NSW outlined a needs analysis and assessment of strategic options to support its plan to deliver approximately \$1.0 billion investment in ramps, lifts, stairs, toilets and other items necessary for compliance with the DSAPT. Exhibit 2 shows items that are included in the scope of TAP 3.

#### **Exhibit 2: Overview of upgrades to be delivered as part of TAP 3**

Sydney Trains, Intercity Trains and Regional Trains Networks scope items include:

- installing or modifying ramps
- installing lifts
- installing or updating stairs, including handrails
- installing a family accessible toilet (where toilets are provided at the station or ferry wharf)
- installing a canopy at waiting areas and on new stairs (where required for DSAPT)
- install tactile ground surface indicators at platform level
- wayfinding (to support compliance with the Act).

Sydney Ferries Wharves Network scope items include:

- upgrading/replacing the wharf
- upgrading ferry operational information system
- upgrading/replacing the gangway
- replacing the pontoon
- installing a lift or ramps (if required)
- compliant wayfinding
- installing a canopy at waiting areas
- install tactile ground surface indicators as required
- installing customer information screens
- installing inductive hearing loops
- installing seating to satisfy DSAPT requirements
- installing compliant help points.

Source: Transport for NSW, 2017.

The DSAPT includes a requirement for a five-yearly review to be conducted by the Australian Government, in consultation with state and territory governments and other stakeholders. In its submissions to the 2012 and 2017 reviews of the DSAPT, Transport for NSW identified several issues that deter compliance, namely:

- The DSAPT is not fully consistent with other standards which apply to train stations (such as the Building Code of Australia and the Access to Premises Standard).
- As the DSAPT describes a fixed set of requirements for infrastructure, it has had the effect of restricting the scope of alternative solutions that may achieve better outcomes for people with disability.
- The requirements of the DSAPT apply to all stations and wharves that are in use, regardless of patronage.
- Some ferry wharves can be upgraded to be DSAPT compliant, however the access to the wharf (from the local area) is likely to remain inaccessible due to the high cost of addressing geographical challenges.

**Transport for NSW does not intend to use TAP 3 funding on upgrades and work that are not essential for compliance with the Act and the DSAPT**

Elements of TAP 1 and TAP 2 that were not essential for compliance with DSAPT, are not part of TAP 3 upgrades. These include:

- station capacity upgrades
- canopies (unless specifically required for compliance with the Act)
- commuter car parks (other than provision of accessible parking spaces)
- bike sheds
- rural interchange upgrades (bus / taxi / kiss and ride / commuter car parks, unless specifically required for compliance with the Act)
- bus interchange upgrades (not directly required for DSAPT compliance)
- minor works and safety.



## 2.2 Reviews of the Transport Access Program

Between August 2015 and April 2016, Transport for NSW commissioned three external reviews of the TAP, conducted by consultants. Findings and recommendations from these reviews cover five key themes, which include scope, effectiveness, efficiency, governance and project coordination.

### Scope

- TAP did not have a clear objective. Instead, TAP consisted of several sub-programs (for example Easy Access, Park and Travel Safety and Way Finding and Signage) each with their own objective.
- Transport for NSW could not accurately determine its level of compliance with DSAPT and Transport for NSW did not have a plan for achieving DSAPT compliance.

### Effectiveness

- There was no robust system in place to measure, monitor and evaluate benefits of TAP.
- Transport for NSW can improve its identification and engagement of stakeholders during the planning and delivery of TAP projects. Examples of stakeholders to be engaged in TAP include:
  - public transport customers
  - local community, businesses and schools
  - government departments and agencies
  - industry contractors and suppliers
  - utility providers
  - emergency services
  - media.

### Efficiency

- Transport for NSW did not explore the potential for bundling together the delivery of projects to improve value for money.
- Transport for NSW could review its design standards to include modular design (also known as a kit of parts) to deliver efficiencies across multiple projects.
- Transport for NSW did not benchmark projects against comparable projects to demonstrate value for money.

### Governance

- TAP governance structure did not operate as intended and there was no single point of accountability for outcomes of the TAP. Governance groups did not share information, lacked holistic oversight of projects' program life cycle and effective risk management.
- Transport for NSW did not make full use of independent assurance processes.

### Project coordination

- TAP did not consider and identify other programs and projects that Transport for NSW was delivering or planning.

### Transport for NSW has addressed most findings from reviews of TAP 1 and TAP 2

Transport for NSW has addressed most of the findings from reviews of TAP 1 and TAP 2. However, Transport for NSW has not completed a comprehensive, network wide, audit of DSAPT compliance as recommended by the reviews. Exhibit 3 outlines actions taken by Transport for NSW in response to the reviews.



### Exhibit 3: Actions taken by Transport for NSW in response to reviews

Recommendation areas	Transport for NSW responded to the findings by:
<b>Scope</b>	<ul style="list-style-type: none"> <li>• setting a clear objective for the TAP (see Section 2.1).</li> </ul>
<b>Effectiveness</b>	<ul style="list-style-type: none"> <li>• developing a benefits realisation plan for TAP 3. This plan provides an approach to identifying, recording, assessing, measuring and monitoring benefits that TAP 3 could deliver</li> <li>• commissioning a qualitative research study to identify and deliver design recommendations that comply with the Act and enhance the delivery of customer benefits in TAP 3</li> <li>• establishing a strategy to implement stakeholder engagement. Identifying and engaging stakeholders early would assist in avoiding project delays and additional costs.</li> </ul>
<b>Efficiency</b>	<ul style="list-style-type: none"> <li>• packaging together the delivery of some project construction for TAP 3. This will increase the opportunity to realise cost savings when purchasing items in bulk amounts across multiple projects</li> <li>• exploring options to develop a series of standardised designs for items that station upgrades commonly require, such as lift shafts and footbridges. The use of standardised design will reduce the cost of tendering and could reduce the time taken to manufacture and deliver projects</li> <li>• adequately investigating the commercialisation of train stations, by transforming stations into retail hubs. This approach could provide alternative sources of funding to support DSAPT compliance</li> <li>• engaging external advisors to provide cost estimates, economic and financial appraisal. This analysis assisted in demonstrating value for money for projects.</li> </ul>
<b>Governance</b>	<ul style="list-style-type: none"> <li>• appointing an overall Executive Director for TAP who is accountable for the outcomes of TAP</li> <li>• improving governance frameworks. These frameworks outline responsibilities and accountabilities, include end-to-end oversight of the program and risk management plans for TAP 3</li> <li>• applying an independent risk-based assurance process under Infrastructure NSW's Infrastructure Investor Assurance Framework.</li> </ul>
<b>Project coordination</b>	<ul style="list-style-type: none"> <li>• coordinating with other Transport for NSW projects. Transport for NSW can reduce congestion and customer disruption by coordinating projects, if many occur at any single TAP project location</li> <li>• identifying other Transport for NSW programs that are addressing a similar need to that of TAP, which will avoid overlap in programs.</li> </ul>

Source: Audit Office Research 2018.



## 3. Prioritisation and selection of TAP 3 funded projects

### 3.1 The TAP 3 prioritisation and selection methodology

**The Transport for NSW Executive and the Minister for Transport and Infrastructure approved a prioritisation and selection methodology for TAP 3**

The Freight, Strategy and Planning branch of Transport for NSW developed a prioritisation and selection methodology for TAP 3 at the same time as the objectives for the TAP were revised in 2016. Transport for NSW Executive and the Minister for Transport and Infrastructure approved the methodology as part of their endorsement of the revised objective.

The methodology is an eight-step process, conducted over two stages. The first six steps informed the development of the TAP 3 strategic business case and the remaining two stages are ongoing.

**Exhibit 4: Prioritisation and selection methodology for TAP 3**

PROJECT STAGE	STEP	DESCRIPTION
STAGE 0 NEEDS CONFIRMATION	1	<b>REFINE</b> The list of outstanding locations was refined by removing: <ul style="list-style-type: none"><li>• Interchanges known to be already wheelchair accessible</li><li>• Interchanges in construction phase for a wheelchair accessible upgrade</li><li>• Interchange upgrades being funded through other programs of work (e.g. Sydney Metro/Parramatta Light Rail)</li></ul>
	2	<b>SCORE AGAINST CRITERIA</b> Non-accessible interchanges were scored against criteria and weightings based on data collected about each interchange.
STAGE 1 NEEDS ANALYSIS	3	<b>EVALUATE COMMERCIAL POTENTIAL</b> Review commercial development potential of prioritised interchanges. This is to ensure that, where applicable, an upgrade is delivered in conjunction with commercial redevelopment. It also allows for costs to be offset instead of being wholly reliant on state funding.
	4	<b>FURTHER ANALYSIS</b> Complete on-the-ground investigations and photographs to confirm the existing level of compliance and cost estimates to identify the cost for achieving DSAPT compliance at the interchanges.
	5	<b>PRIORITISATION ACROSS TRANSPORT NETWORKS/MODES</b> Use the cost estimates to identify the value for money for each interchange based on the score from Step 2 and to prioritise projects across modes. Consider the whole of life costs for operations and maintenance.
	6	<b>ALIGNMENT</b> Align the list with other programs of work and considers factors such as the compatibility with other works at the station, the timeline to complete the projects, the amount and availability of funding and the resources required to complete the projects. The result is a proposed priority order of TAP3 upgrades.
OUTSIDE OF TAP3	7	<b>GAP ANALYSIS</b> For the interchanges which will remain not wheelchair accessible post TAP3, consider other programs which could fund a wheelchair accessible upgrade.
	8	<b>OPERATIONAL INVENTIONS</b> Consider Operational inventions to reduce the cost required to provide a wheelchair accessible upgrade.

Source: Transport for NSW, 2016.

## **Transport for NSW has not completed a comprehensive DSAPT audit across the four networks**

An audit of DSAPT compliance is needed to measure the complete scope of work needed for full DSAPT compliance. Crucially, it is also an important way that Transport for NSW can ensure it has a complete picture of barriers to accessibility across its network. The reviews of TAP 1 and TAP 2, as well as the strategic business case for TAP 3, identified the need for an audit of DSAPT compliance.

Transport for NSW used wheelchair accessibility as an initial criterion to exclude locations from the prioritisation and selection process. Transport for NSW considers a station or ferry wharf accessible if deemed suitable for access by wheelchair users. However, wheelchair accessible stations and ferry wharves may not necessarily be fully compliant with the DSAPT and may have other accessibility barriers that impede their use by people with disability.

Transport for NSW did not provide evidence that it completed a comprehensive DSAPT audit across the four networks at any stage before, or during, the prioritisation and selection process for TAP 3 projects. Instead, Transport for NSW advised that it is undertaking a phased approach to completing a comprehensive audit of DSAPT compliance across the four networks.

As part of the prioritisation process for the third tranche of TAP, Transport for NSW initially used the accessibility information it publishes to determine which locations were not wheelchair accessible, and then completed on-the-ground investigations at 68 locations with the highest need rank across the four networks to confirm the existing level of compliance to DSAPT requirements at these locations. Transport for NSW used desktop assessments for the remaining non-accessible locations. After the strategic business case, Transport for NSW completed additional compliance audits for shortlisted locations during the scoping and design phase.

In accordance with the prioritisation and selection methodology, Transport for NSW plans to undertake a gap analysis of the remaining wheelchair inaccessible locations across the four networks once the TAP 3 program is finalised (currently scheduled for the first quarter of 2019). We note that Transport for NSW's phased approach does not include DSAPT compliance audits for stations that are considered wheelchair accessible.

Transport for NSW cannot demonstrate the full effectiveness of its approach as it does not know the complete scope of work required for full DSAPT compliance. Additionally, Transport for NSW will not be able to determine the extent that TAP 3 will contribute to the achievement of DSAPT compliance without understanding the current level of compliance across the New South Wales transport network.

Lastly, Transport for NSW identified data quality issues with the accessibility information it used during the prioritisation process. A comprehensive DSAPT audit would assist Transport for NSW to improve the accuracy of its accessibility information.

## **Transport for NSW initially included Redfern Station within a separate funded program outside of TAP 3**

Redfern station is the sixth busiest station on the Sydney Trains network and currently only has lift access to two of its 12 platforms. In 2016, Transport for NSW ranked Redfern station as a high priority for upgrade.

During step 1 (refinement) of the assessment process for the TAP 3 strategic business case, Transport for NSW excluded interchanges that were scheduled for upgrade as part of other infrastructure development programs such as the South Metro and the Redfern/North Eveleigh projects as the interchanges were already included in separate business cases. As a result, it excluded Redfern station from TAP 3, and included other locations in the TAP 3 strategic business case, even though Redfern would have rated as a high priority on TAP 3 criteria.

The Redfern/North Eveleigh project is a joint project between Transport for NSW and UrbanGrowth NSW to revitalise the Redfern and North Eveleigh precinct and includes Redfern Station and Australian Technology Park. In 2017, the NSW Government considered a strategic business case for the Redfern/North Eveleigh project with an estimated delivery date of 2022.

In August 2018, Transport for NSW revised its approach to include part of the Redfern station upgrade within TAP to ensure that accessibility at Redfern station would be significantly improved before the 2022 DSAPT compliance date. Transport for NSW is developing design options for the accessibility improvements at Redfern station, which it intends to document within a final business case. As part of the TAP 3 development stage, Transport for NSW are assessing the impacts of the inclusion of accessibility improvements at Redfern station on the broader TAP 3 program as the reinclusion of Redfern station into TAP 3 may result in some projects no longer being funded.

### Transport for NSW used appropriate criteria to assess eligible sites

Transport for NSW developed criteria to prioritise eligible sites for the TAP 3 strategic business case. As part of step 2 (score against criteria), Transport for NSW ranked the refined list of sites according to their scores against weighted selection criteria which considered:

- patronage (current and future)
- related services (also known as demand generators) which include aged care facilities, disability services, areas of employment, as well as educational facilities and hospitals
- population demographics (people with disability aged under 60, people aged over 60 and children under five years old, from ABS data)
- number of services (relates to patronage).

Transport for NSW's patronage figures are based on Opal card data. There is no specific card type for customers with disability, and Transport for NSW does not have network wide data showing how people with disability use the trains and ferries. To resolve this limitation, Transport for NSW developed criteria using demographic information to inform its prioritisation and selection process.

#### Exhibit 6: TAP 3 prioritisation criteria per network

All networks	Sydney Trains network	Intercity Trains network	Regional Trains network	Sydney Ferries network
<ul style="list-style-type: none"> <li>• Workday and non-workday patronage</li> <li>• Education Access</li> <li>• Centre classification</li> <li>• Demographic data: <ul style="list-style-type: none"> <li>– Disability &lt; 60 years old</li> <li>– Child &lt; 5 years</li> </ul> </li> <li>• Aged &gt; 60 years old</li> </ul>	<ul style="list-style-type: none"> <li>• Patronage &gt; 60 years (workday and non-workday)</li> <li>• Forecast patronage growth</li> <li>• Number of registered mobility permits in interchange's postcode area</li> </ul>	<ul style="list-style-type: none"> <li>• Patronage &gt; 60 years (workday and non-workday)</li> <li>• Forecast patronage growth</li> <li>• Number of registered mobility permits in interchange's postcode area</li> <li>• Number of services per day (Tuesday and weekend average)</li> <li>• Connecting coach interchange</li> </ul>	<ul style="list-style-type: none"> <li>• Number of services per day (Tuesday and weekend average)</li> <li>• Connecting coach interchange</li> <li>• Population growth</li> </ul>	<ul style="list-style-type: none"> <li>• Patronage &gt; 60 years (workday and non-workday)</li> <li>• Forecast patronage growth</li> <li>• Number of registered mobility permits in interchange's postcode area</li> <li>• Education Access</li> </ul>

Source: Transport for NSW 2017.

Transport for NSW also used different size 'catchment areas' for demographics and related services. For example, Sydney Trains and Intercity services used a 'within 800 metre' catchment area for demand generators and demographics whereas NSW Trains interchanges used 'within town'. Patronage (40 per cent) and demographics (40 per cent) were the 'leading' criteria, constituting 80 per cent of the weighted score across all four networks.

In our view, this process was appropriate and effective because it used the best available evidence to consider current and future demand.

### **The prioritisation process considered deliverability, value for money and the impact of delivering other infrastructure**

Reviews of TAP 1 and TAP 2 recommended that Transport for NSW improve how it considered deliverability, value for money and the impact of delivering other infrastructure. Transport for NSW considered these factors by including them as steps in the prioritisation and selection methodology.

Transport for NSW engaged a consultant to undertake economic and financial analysis for all potential sites, included in the strategic business case for TAP 3. The economic appraisal of TAP 3 used cost benefit analysis in accordance with guidance produced by Transport for NSW, New South Wales Treasury and the Australian Transport Council.

Transport for NSW considered deliverability during step 6 (alignment), where the impact of other construction work across the network interferes with its ability to undertake work on TAP 3 projects. The number of accessibility upgrades being considered for TAP 3 is significantly greater than in previous tranches. Infrastructure NSW also noted that the volume of infrastructure project currently being delivered on the east coast of Australia presents challenges and opportunities for TAP 3 delivery. As a result, Transport for NSW have extended the TAP 3 delivery window and brought forward a number of projects.

As part of the prioritisation process, Transport for NSW considered multiple scenarios based on inputs such as value for money, need, and the funding amount available.

During the preparation of the TAP 3 strategic business case, Transport for NSW also identified potential reserve projects that it could deliver with 'unspent' funds as part of its assessment of different funding scenarios.

Appendix four has assessment details for all locations considered for TAP 3.

### **Transport for NSW focuses on wheelchair accessibility to measure accessibility outcomes**

Transport for NSW estimated what it would achieve at the completion of TAP 3, such as improvements to network accessibility (as measured by percentage of locations considered wheelchair accessible) and the percentage of wheelchair accessible passenger trips (across the entire network).

The accessible trip metric measures accessibility at the point where passengers start journeys or trips, based on the percentage of customer trips from a wheelchair accessible interchange over the total network patronage. Infrastructure NSW noted in its assessment of the TAP 3 strategic business case that the percentage of non-accessible stops (or journeys) would be higher if the measure considered the endpoint (or destination).

Infrastructure NSW also suggested that Transport for NSW develop a mechanism to capture and evaluate the practical outcomes for people with disability. In response to this recommendation Transport for NSW referred to a qualitative research study to identify how Transport for NSW could best deliver design recommendations with a focus on DSAPT compliance that will enhance delivery of customer benefits in TAP 3.

While it is important to balance DSAPT network compliance (as an outcome measure) with passenger outcomes, Transport for NSW should adopt a metric which better reflects accessibility outcomes for customers with disabilities. The results of a comprehensive DSAPT compliance audit would have helped Transport for NSW objectively measure and report on progress in achieving accessibility outcomes for its customers.

### **Transport for NSW added four sites to the TAP 3 shortlist after the gateway review of the strategic business case**

In 2017, Transport for NSW prepared a strategic business case that identified 67 locations to proceed to the scoping design phase for further investigation before consideration for funding in the final business case. The inclusion of these locations in the scoping design phase does not guarantee that Transport for NSW will include them in the TAP 3 final business case for funding.

Infrastructure NSW conducted an assurance review of the strategic business case in November/December 2017.

Transport for NSW advised us that, subsequent to this, it is undertaking scoping designs for an additional four locations. Transport for NSW did not initially select three of these four locations as part of the TAP 3 strategic business case due to other locations being more highly ranked.

In January 2018, Transport for NSW added three sites (Denistone, Goulburn and East Hills) to the scoping design phase after a meeting with representatives from the Minister's office to align with 'government priorities'. While East Hills station already has ramps up to all platforms, and level street access, Transport for NSW does not consider it wheelchair accessible as the ramps are not DSAPT compliant.

In April 2018, Transport for NSW added Clarendon station to the scoping design phase after a meeting with representatives from the Minister's office. Transport for NSW had already installed wheelchair accessible ramps at Clarendon Station in 2014 as part of TAP 1. Despite these works, Transport for NSW classified the station as not wheelchair accessible due to the non-compliant pedestrian level crossing. Prior to this Clarendon Station had consistently scored the lowest of all Sydney Trains interchanges on the assessment criteria and Transport for NSW did not include it for further investigation in the TAP 3 strategic business case.

By August 2018, the TAP 3 development stage included 71 locations, based on the 67 locations included in the TAP 3 Strategic Business Case and the additional four locations added to the scoping design phase following meetings with the Minister's Office.

Transport for NSW and the Minister's office were unable to provide documentation that supports these decisions. Decisions regarding how and why projects are prioritised for funding are official government business. Under the *State Records Act 1998*, NSW Government agencies and Ministers' offices both have obligations to create and maintain full and accurate records of any official government business transacted by the office.

### **Transport for NSW applied sound governance and project management in refining the prioritisation process after the strategic business case**

As mentioned above, Transport for NSW's prioritisation methodology excluded wheelchair accessible train stations and ferry wharves from consideration for the TAP 3 strategic business case. However, we found that Transport for NSW assessed 15 regional train stations that were wheelchair accessible. During the course of the audit, Transport for NSW identified that its regional network maps it initially used to assess wheelchair accessibility were inaccurate.

After the completion of the TAP 3 strategic business case, Transport for NSW completed on-the-ground investigations at a large proportion of regional locations. The findings of the investigations indicate that most locations on the NSW Trains regional network are wheelchair accessible. As a result, Transport for NSW has advised that it has refined the prioritisation process for the regional network to refocus on upgrading non-DSAPT compliant locations which align with the Future Transport Strategy 2056 and changes to service delivery.

Transport for NSW managed changes to the prioritisation process for regional locations in accordance with the TAP 3 governance framework. While issues with data quality reinforce the need of a comprehensive audit of DSAPT across the four networks, Transport for NSW has effectively applied sound governance and project management in refining the prioritisation process in light of new information.

### **Transport for NSW is still developing the final business case for TAP 3**

At the time of writing this report, Transport for NSW is preparing a final business case for TAP 3. In August 2018, at the commencement of this audit, Transport for NSW intended to complete the selection of projects for the TAP 3 final business case in December 2018. Transport for NSW now advise that it intends to complete the development stage and final business case in the first quarter of 2019, prior to the final investment decision of the TAP program.

This report is based on the TAP 3 strategic business case and information provided by Transport for NSW up to December 2018.



## 3.2 Future accessibility of train and ferry networks

### Transport for NSW will not meet the DSAPT compliance target in 2022

While TAP 3 represents a significant step for Transport for NSW in closing the gap in DSAPT compliance, Transport for NSW has acknowledged that it will not achieve the DSAPT compliance targets. By June 2023, Transport for NSW expects that at the completion of upgrades as part of TAP 3 projects prioritised within the TAP 3 strategic business case, and following progress on other Transport for NSW programs (including Sydney Metro and light rail projects), 78 per cent of stations and ferry wharves will be wheelchair accessible, and 98 per cent of rail and ferry customers will use a wheelchair accessible station or ferry wharf.

Infrastructure NSW, as part of its gateway assessment of the TAP 3 strategic business case, identified the need for a longer-term strategy for accessibility beyond TAP 3. The prioritisation methodology includes reference to a gap analysis but notes that this work falls outside the scope of TAP 3. Transport for NSW advises that it intends to complete the gap analysis after the development of the TAP 3 program.

As mentioned earlier in this report, Transport for NSW is not able to accurately determine the current level of DSAPT compliance across the network and the contribution of TAP to DSAPT compliance. Transport for NSW has completed DSAPT compliance audits on locations included in the scoping design phase, where it focusses on locations that are inaccessible to users with reduced mobility. As a result, Transport for NSW is unable to outline a comprehensive strategy to achieve full compliance, across the network, with the Act and DSAPT requirements.



## 4. Alignment with Transport for NSW's Disability Inclusion Action Plan 2018–2022

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Transport for NSW has a Disability Inclusion Action Plan (the Action Plan) 2018–2022 that sets an overall framework for planning, delivering and reporting on initiatives to increase accessibility of the transport network. It covers all elements of the journey experienced when using public transport, including journey planning, staff training, customer services and interaction between the physical environment and modes of transport. Appendix five outlines the guiding principles of the Action Plan.

Transport for NSW's Transport Social Policy branch developed the Action Plan in consultation with internal and external stakeholders. The director of the Transport Social Policy branch is a member of the TAP executive steering committee, which supports alignment between the Action Plan and TAP.

### **Transport for NSW's Disability Inclusion Action Plan describes a customer focussed approach to accessibility**

One of the guiding principles of the Action Plan is 'intelligent compliance'. Transport for NSW describes this as compliance that prioritises customer-focused outcomes over a narrow focus on legal compliance with accessibility standards. As well as being compliant, infrastructure should be practical, usable, fit for purpose and convenient.

The TAP prioritisation and selection methodology reflects Transport for NSW's focus on intelligent compliance. We consider this a reasonable approach as had Transport for NSW focussed exclusively on achieving compliance with the DSAPT targets by upgrading the most affordable infrastructure, some locations, that are used by more customers, would remain inaccessible to people with disability. However, this approach should not be seen as an alternative to Transport for NSW meeting its DSAPT compliance obligations.

### **TAP program staff consult with the Accessible Transport Advisory Committee**

The Accessible Transport Advisory Committee (ATAC) has representatives from disability and ageing organisations, who provide expert guidance to Transport for NSW on access and inclusion. The ATAC provide guidance and feedback on projects and project solutions, including user testing where appropriate. TAP program staff provide regular updates at ATAC meetings, which include briefings on progress. The ATAC also provides feedback and suggestions to TAP program staff, which is considered and sometimes included in current and future projects. For example, in March 2017 the TAP program team briefed the ATAC on the challenges with respect to a number of ferry wharves and sought support for DSAPT exemptions proposed in the TAP 3 strategic business case.

### **Case study: Feedback on Braille lettering for lift buttons**

In June 2018, the Program team sought feedback on a variety of lift button options to improve accessibility on future TAP projects. In September 2018, during the ATAC meeting attended by the Audit Office, the program team sought feedback on the standard designs for TAP 3. Some ATAC members noted that the standard design included Braille lettering on the lift buttons, and that this was not good practice because people can accidentally press the button while reading it. As a result, Transport for NSW are incorporating this feedback into design requirements for the lifts for TAP 3, which will consider larger buttons, clearer Braille and Braille signage adjacent to the button.



### **Transport for NSW has not briefed the Advisory Committee on the outcome of the prioritisation and selection process**

TAP program staff briefed the Advisory Committee about the prioritisation and selection methodology, after the Minister approved it in 2016. However, Transport for NSW have not briefed or consulted the Advisory Committee on the outcome of the prioritisation process. Infrastructure NSW noted this issue during its review of the strategic business case.

Transport for NSW advised us that it established the ATAC as an advisory group, and that Transport for NSW does not disclose sensitive information to it. Transport for NSW intends to share the outcome of the prioritisation process following the completion of the TAP 3 development stage and final investment decision.

### **The TAP communication plan does not fully meet the requirements of the Disability Inclusion Action Plan**

The Disability Inclusion Action Plan includes an action item to 'provide a listing of stations and wharves to be upgraded with estimated time of construction as each new tranche of the Transport Access Program is announced' The TAP Communication Plan that we reviewed does not include this provision instead focussing on communication on a per project basis. Given the long timeframes associated with improving transport infrastructure, this information is important as it allows people to make informed decisions about where they live, work or study.



## **Section two**

### Appendices





## Appendix one – Response from agency

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Ms Margaret Crawford  
Auditor-General  
Audit Office of NSW  
GPO Box 12  
SYDNEY NSW 2001

Dear Ms Crawford

Thank you for the opportunity to consider and respond to the Performance Audit Report on the Transport Access Program.

Transport for NSW views the Transport Access Program as an important program that helps to improve accessibility of public transport across NSW. The Transport Access Program Tranche 3 represents a significant opportunity to maximise accessibility levels prior to the targets in the disability standards, building on the proportion of accessible stations that has risen from 47.4 per cent in 2012 to 55.8 per cent in 2018.

Transport for NSW welcomes the opportunity that the Performance Audit provides to optimise how the Transport Access Program continues to improve accessibility in NSW.

Transport for NSW accepts the recommendations and will implement these to improve the Transport Access Program and maximise compliance with disability standards.

Yours sincerely

**Rodd Staples**  
Secretary

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## Appendix two - Compliance requirements of Disability Standards for Accessible Public Transport

Transport Standards section	Area covered	Per cent compliance required by (%):			
		2007	2012	2017	2022
2.1 - 2.9	Access paths (within vehicles and infrastructure)	25	55	90	100
3.1 - 3.3	Manoeuvring areas	25	55	90	100
4.1 - 4.3	Passing areas (within infrastructure and trains)	25	55	90	100
5.1	Resting points (infrastructure only)	25	55	90	100
6.1 - 6.4	Ramps (within infrastructure and vehicle boarding ramps)	25	55	90	100
7.1 - 7.2	Waiting areas (general infrastructure)	100	--	--	--
7.1 - 7.2	Waiting areas (bus stops)	25	55	90	100
8.1 - 8.8	Boarding (mainly vehicles, but also infrastructure at boarding points)	25	55	90	100
9.1 - 9.11	Allocated spaces (mainly vehicles)	25	55	90	100
10.1	Surfaces	NA	100	--	--
11.1 - 11.7	Handrails and grab rails	NA	100	--	--
12.1 - 12.6	Doorways and doors	25	55	90	100
13.1	Lifts (infrastructure only)	25	55	90	100
14.1 - 14.4	Stairs (infrastructure and steps into vehicles)	25	55	90	100
15.1 - 15.6	Toilets	25	55	90	100
16.1 - 16.5	Symbols (generally within infrastructure and vehicles)	100	--	--	--
16.1 - 16.5	Symbols (at bus stops)	25	55	90	100
17.1 - 17.7	Signs (generally within infrastructure and vehicles)	100	--	--	--
17.1 - 17.7	Signs (at bus stops)	25	55	90	100
18.1 - 18.5	Tactile ground surface indicators	25	55	90	100
19.1	Alarms	100	--	--	--
20.1-20.2	Lighting (generally within infrastructure and buildings)	100	--	--	--
20.1 - 20.2	Lighting (at bus stops)	25	55	90	100
21.1 - 21.4	Controls (stop requests and door controls etc.)	25	55	90	100
22.1	Furniture and fitments (tables, benches etc. within infrastructure)	100	--	--	--
23.1	Street furniture	25	55	90	100

Transport Standards section	Area covered	Per cent compliance required by (%):			
		2007	2012	2017	2022
24.1	Gateways (ticket barriers etc.)	NA	100	--	--
25.1 - 25.4	Payment of fares (including vending machines)	NA	100	--	--
26.1	Hearing augmentation – listening systems	100	--	--	--
27.1 - 27.4	Information (generally within infrastructure and vehicles)	100	--	--	--
27.1 - 27.4	Information (at bus stops)	25	55	90	100
28.1 - 28.4	Booked services (trains and coaches only)	100	--	--	--
29.1 - 29.3	Food and drink services (infrastructure and country trains)	100	--	--	--
30.1	Belongings (carriage of disability aids in vehicles)	100	--	--	--
31.1 - 31.2	Priority seating (within vehicles)	100	--	--	--
16.1 - 16.5	Symbols (at bus stops)	25	55	90	100

Note: Excludes rail vehicles.



## Appendix three – TAP 1 and TAP 2 sub-programs

### TAP 1 sub-programs

TAP 1 sub-program	Objective of sub-program	Examples of items in scope
<b>Easy Access</b>	<ul style="list-style-type: none"><li>• Improve access to public transport for people with disability, the elderly, and customers travelling with children, and customers travelling with luggage.</li><li>• Stations upgraded to alignment with the Act and the DSAPT.</li></ul>	<ul style="list-style-type: none"><li>• Lifts</li><li>• Ramps</li><li>• Tactile Ground Surface Indicators</li><li>• Toilets</li><li>• Hand rails</li></ul>
<b>Station Upgrades</b>	<ul style="list-style-type: none"><li>• Improve and upgrade major (non-CBD) and minor stations to provide adequate capacity to meet future growth and support urban renewal.</li></ul>	<ul style="list-style-type: none"><li>• New buildings</li><li>• Access upgrades</li><li>• Signage</li></ul>
<b>Park and Travel Safety</b>	<ul style="list-style-type: none"><li>• Improve and enhance security and safety of passengers and customer perception of security and safety.</li></ul>	<ul style="list-style-type: none"><li>• Security fencing</li><li>• Lighting</li><li>• CCTV</li><li>• Help Points</li><li>• Marking for disabled car parking spaces</li></ul>
<b>Wayfinding and signage</b>	<ul style="list-style-type: none"><li>• Standardise and improve the information available for customers to facilitate easy movement through the transport network.</li></ul>	<ul style="list-style-type: none"><li>• Directional and information signage</li></ul>
<b>Ferry Wharf Upgrades</b>	<ul style="list-style-type: none"><li>• Improve amenities for commuters, improve wharf efficiency by increasing the rate at which passengers embark and disembark, reduce ongoing maintenance costs and improve access for people with disability.</li><li>• Create a functional, distinctive and unified look to ferry wharves.</li></ul>	<ul style="list-style-type: none"><li>• Shelter</li><li>• Seating</li><li>• Pontoons</li><li>• Roofing</li><li>• Gangways</li></ul>



## TAP 2 sub-programs

TAP 2 sub-program	Objective of sub-program	Examples of scope items
<b>Easy Access</b>	<ul style="list-style-type: none"> <li>Improve access to public transport for people with disability, the elderly, and customers travelling with children, and customers travelling with luggage.</li> <li>Stations upgraded to alignment with the Act and the DSAPT.</li> </ul>	<ul style="list-style-type: none"> <li>Lifts</li> <li>Tactile Ground Surface Indicators</li> <li>Toilets</li> <li>Kiss and ride zones</li> <li>Seating and shelter</li> <li>Canopies</li> <li>Taxi bays</li> <li>Closed Circuit television cameras</li> <li>Bike racks</li> </ul>
<b>Commuter Car Park</b>	<ul style="list-style-type: none"> <li>Reduce total vehicle kilometres travelled and encourage greater use of public transport.</li> </ul>	<ul style="list-style-type: none"> <li>Multi-storey car parks</li> <li>Ground level car parks</li> </ul>
<b>Rural and Regional Interchanges</b>	<ul style="list-style-type: none"> <li>Support regional transport plans, improve customer experience at weather affected interchanges, and respond to current and future demand for public transport.</li> </ul>	<ul style="list-style-type: none"> <li>Toilets</li> <li>Kiss and ride zones</li> <li>Tactile Ground Surface Indicators</li> <li>Seating and shelter</li> <li>Bike racks</li> <li>Taxi bays</li> </ul>
<b>Ferry Wharf Upgrade</b>	<ul style="list-style-type: none"> <li>Improve amenities for commuters, improve wharf efficiency by increasing the rate at which passengers embark and disembark, reduce ongoing maintenance costs and improve access for people with disability.</li> <li>Create a functional, distinctive and unified look to ferry wharves.</li> </ul>	<ul style="list-style-type: none"> <li>Pontoons</li> <li>Canopies</li> <li>Wayfinding and signage</li> <li>Lifts</li> </ul>



## Appendix four – Prioritisation Assessment for the TAP 3 Strategic Business Case

### Sydney Trains Prioritisation Assessment for the TAP 3 Strategic Business Case

Station	Need rank	Patronage (passengers per week)	Benefit cost ratio
Petersham	2	36,884	2.91
Stanmore	4	40,347	2.37
Kingswood	1	23,330	2.02
St Peters	13	42,239	2.02
Normanhurst	26	17,492	1.45
Warrawee	23	11,200	1.29
Pymble	21	27,761	1.28
North Strathfield	15	29,822	1.17
Beecroft	36	22,358	1.16
Wahroonga	18	22,495	1.15
Canley Vale	5	27,502	1.14
Wollstonecraft	8	30,755	1.10
Waitara	3	32,939	1.00
Banksia	7	17,820	0.97
Tempe	32	15,823	0.78
Thornleigh	27	22,381	0.74
Roseville	12	29,684	0.73
Lewisham	6	25,562	0.72
Bardwell Park	22	12,509	0.65
Yagoona	9	17,384	0.60
Bexley North	14	12,378	0.59
Turrella	17	13,659	0.57
Yennora	30	9,487	0.57
Doonside	20	24,716	0.56
Killara	16	25,755	0.54

Station	Need rank	Patronage (passengers per week)	Benefit cost ratio
Birrong	31	11,105	0.54
Asquith	28	13,344	0.49
Denistone	25	6,572	0.47
Chester Hill	19	10,335	0.46
East Hills	37	8,844	0.44
Erskineville	10	29,657	0.43
Mount Colah	41	5,478	0.39
Macquarie Fields	34	10,598	0.39
Riverstone	38	6,698	0.37
Como	35	8,160	0.34
Clyde	33	7,425	0.32
Macdonaldtown	11	18,229	0.28
Loftus	39	6,128	0.25
Carramar	24	5,542	0.21
Villawood	29	5,063	0.20
Mulgrave	43	3,079	0.15
Leightonfield	40	2,367	0.10
Vineyard	44	1,135	0.09
Mount Kuring-gai	42	2,706	0.08
Clarendon	45	900	0.04

Note: this data was used for the TAP 3 Strategic Business Case in November 2017 and may have been revised since then. A high ranking on these lists does not guarantee that a location will be selected for funding.

## Intercity Trains Prioritisation Assessment for the TAP 3 Strategic Business Case

Station	Need rank	Patronage (passengers per week)	Benefit cost ratio
Glenbrook	12	5,607	0.60
Hazelbrook	10	3,836	0.32
Dapto	1	5,296	0.25
Unanderra	9	5,153	0.22
Narara	4	3,732	0.18
Ourimbah	18	3,335	0.16
Faulconbridge	27	1,469	0.16
Mittagong	8	1,606	0.14
Lisarow	13	1,984	0.14
Blackheath	14	2,809	0.14
Hawkesbury River	38	2,892	0.14
Point Clare	15	2,236	0.13
Wyee	16	2,828	0.11
Warnervale	30	2,803	0.11
Lawson	22	1,997	0.10
Warrimoo	23	2,294	0.10
Bellambi	5	1,103	0.10
Fairy Meadow	6	1,278	0.09
Lapstone	25	1,577	0.08
Mount Victoria	40	1,093	0.08
Austinmer	17	1,437	0.08
Coniston	3	2,632	0.07
Otford	44	967	0.07
Niagara Park	11	1,300	0.07
Bullaburra	39	751	0.07
Tascott	19	1,983	0.06
Waratah	2	2,001	0.06
Valley Heights	29	263	0.06
Koolewong	41	1,101	0.05
East Maitland	24	359	0.04
Bargo	26	663	0.04
Stanwell Park	28	976	0.04

Station	Need rank	Patronage (passengers per week)	Benefit cost ratio
Towradgi	7	988	0.04
Medlow Bath	42	682	0.03
Woodford	36	1,349	0.03
Dora Creek	35	439	0.03
Coledale	32	410	0.03

Note: this data was used for the TAP 3 Strategic Business Case in November 2017 and may have been revised since then. A high ranking on these lists does not guarantee that a location will be selected for funding.

## Regional Trains Prioritisation Assessment for the TAP 3 Strategic Business Case

Station	Need rank	Patronage (passengers per week)	Benefit cost ratio
Taree	2	537	0.13
Moree	8	220	0.07
Blayney	7	67	0.05
Urunga	10	92	0.05
Griffith	1	153	0.05
Gloucester	6	88	0.04
Kendall	13	110	0.04
Narrabri	4	111	0.03
Eungai	18	9	0.02
Walcha Road	17	31	0.01
Kyogle	11	23	0.01
Werris Creek	12	61	0.01
Wingham	5	75	0.01
Boggabri	15	13	0.01
Sawtell	3	89	0.01
Harden	9	73	0.01
Tarago	16	17	0.00
Stuart Town	21	10	0.00
Bellata	23	6	0.00
Menindee	22	5	0.00
Euabalong West	24	4	0.00
Geurie	19	4	0.00
Condobolin	14	6	0.00
Gunning	20	6	0.00
Darnick	25	0	0.00

Note: this data was used for the TAP 3 Strategic Business Case in November 2017 and may have been revised since then. A high ranking on these lists does not guarantee that a location will be selected for funding.

## Ferry Wharves Prioritisation Assessment for the TAP 3 Strategic Business Case

Station	Need rank	Patronage (passengers per week)	Benefit cost ratio
Taronga Zoo	8	21,287	1.85
Watsons Bay	2	13,028	0.24
South Mosman	5	2,690	0.14
Double Bay	3	3,060	0.08
Woolwich	9	3,675	0.07
Greenwich Point	11	1,284	0.06
Kurraba Point	1	2,311	0.05
Kirribilli	4	3,363	0.04
Kissing Point	6	1,495	0.03
Darling Point	12	538	0.03
Old Cremorne	10	965	0.02
North Sydney	7	667	0.02

Note: this data was used for the TAP 3 Strategic Business Case in November 2017 and may have been revised since then. A high ranking on these lists does not guarantee that a location will be selected for funding.



# Appendix five – The guiding principles of Transport for NSW's Disability Inclusion Action Plan

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## **A 'customer first' culture**

The customer is at the centre of everything we do. Transport for NSW recognises the rights of people with disability to participate in communities to the fullest extent possible and the importance of accessible and inclusive transport services to people with disability.

A 'customer first' culture within Transport for NSW will deliver a high level of service for all customers, openness to innovation and striving towards best practice in the delivery of accessible services, information and infrastructure.

## **Access for the entire community**

Improvements to the accessibility and inclusiveness of transport services benefit all users, not just people with disability who rely on accessible transport.

Accessibility can be achieved through the adoption of universal design principles that remove physical barriers to access and create buildings, products and environments that are usable by people of all abilities.

Broad accessibility principles must, however, include more than just physical access to premises and conveyances. Universal design requires that transport services also provide barrier-free access for people who have vision, hearing or cognitive impairments.

## **Intelligent compliance**

'Intelligent compliance' means compliance which prioritises customer-focused outcomes over a narrow focus on legal compliance with accessibility standards.

As well as being compliant, infrastructure should be practical, usable, fit for purpose and convenient.

Encouraging industry partners to think critically about the application of standards and find common sense solutions to compliance matters will result in better outcomes for people with disability.

## **Whole of journey accessibility**

An accessible transport system can be thought of as a series of linked transport systems and services. It involves barrier-free access to:

- the pedestrian environment
- the different modes of transport
- the road network.

Many people with disability and older people will use all three parts of the system: either as public transport users, drivers or passengers in cars, or as pedestrians.

Accessible transport needs to provide for whole of journey accessibility, including seamless transfers between the modes that form a continuous journey. For example, a typical journey might involve looking up timetable information, travelling to a bus stop, waiting, getting on and off the bus, walking to your destination or taking another transport service. Such a journey is only fully accessible if journey planning information and the connection and integration between each part of the journey are easy and safe.



In the past, each mode of transport worked towards achieving targets for accessible transport independently. Under Transport for NSW, the focus has shifted to ensuring customers are able to easily plan and undertake a fully accessible journey.

A fundamental change is the Transport Access Program, which brings together a number of programs to provide commuters with improved accessibility to transport services, to increase connectivity between transport modes and provide improved safety and amenity for all passengers.

Most journeys begin and end with a pedestrian link. For this reason, Transport for NSW is working with councils to achieve improvements to bus stop infrastructure and footpaths. In this way, passengers obtain the full benefits of the investment in accessible public transport vehicles and stations.

## **Equivalent access**

Independent access to public transport is the ultimate goal of Transport for NSW.

However, the use of 'direct assistance' or 'equivalent access' on train stations and ferry wharves will be necessary for at least the next ten years. Existing rail infrastructure and tidal variations at commuter ferry wharves are incompatible with completely independent access.

A high level of commitment to customer service is a key priority of the Plan. Staff training will help to ensure that the dignity and rights of people with disability are respected.

Transport for NSW is improving information for people with disability at public transport facilities and on-board services. However, in some circumstances, the provision of information by staff using 'direct assistance' may be necessary, particularly when normal service provision is disrupted and information needs to be changed continuously and within short timeframes.

## **Reduction in transport disadvantage**

Transport for NSW recognises the significant transport disadvantage faced by people with disability. Transport disadvantage may arise from a number of factors including poor access to services, low income, geographical isolation, high cost of alternative transport services such as taxis and modified private vehicles, lack of confidence and poor community attitudes towards people with disability.

Reducing transport disadvantage requires a multi-faceted approach, making services affordable and providing support services for people with disability who are unable to use mass transit public transport services.

## **Engagement of people with disability**

Customer satisfaction is a key performance indicator for the Plan. Transport for NSW will ensure that people with disability are able to participate in community-wide customer feedback processes.

Transport for NSW will continue to work with the ATAC and customers with disability to identify access solutions that will deliver better services for all customers.

Transport for NSW recognises the vital importance of informing our customers about accessible transport improvements across the network and in their local communities. Transport for NSW will work with advocates to identify access solutions and develop targeted strategies to provide information about access improvements for all customers.



## Appendix six – Transport projects and programs that contribute to DSAPT compliance

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Examples of programs and programs undertaken across the Transport cluster that contribute to increasing compliance with the DSAPT:

- **Transport Access Program (TAP)** – the TAP program provides infrastructure upgrades to existing train stations and ferry wharves.
- **Sydney Metro (Sydney Metro Northwest, and Sydney Metro City and Southwest)** – Sydney Metro will include upgrades to existing stations. These upgrades will ensure that the stations are fully DSAPT compliant.
- **Parramatta Light Rail and South East Light Rail** – these new infrastructure projects will introduce light rail that will be fully accessible by meeting the DSAPT and testing prototypes for accessibility.
- **New Intercity Fleet** – a new fleet of intercity trains that will feature dedicated wheelchair space, accessible toilets, and digital screens and announcements.
- **Sydney Growth Trains project** – this project is an investment in new trains with increased accessibility features.
- **Tangara Technology Upgrade** – this project aims to improve accessibility features on the Tangara train fleet, such as introducing on-board visual passenger information systems, colour contrasted doors and handrails, priority seating and emergency help points.
- **Level crossing program** – this program is focuses on upgrading level crossing to meet DSAPT.
- **Wayfinding program** – this program focuses on wayfinding upgrades. Wayfinding will help customers to navigate the public transport system easily and intuitively. Wayfinding includes signage, tactile ground surface indicators, maps, apps, sounds and textures.
- **Sydney Trains Station Refresh** – numerous station refresh projects will undertake cosmetic upgrades which can include contributing to DSAPT compliance.
- **NSW TrainLink Complaint Handling Improvement Program (CHIP)** – this program includes the installation of CCTV, customer help points and information displays (including hearing loops).
- **Acquisition of new buses by the State Transit Authority** – all new buses feature kneeling suspension for level entry.
- Sydney Trains commissioning of hearing loops on train platforms.



## Appendix seven – About the audit

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### Audit objective

This audit assessed whether Transport for NSW has an effective process to select and prioritise projects as part of the Transport Access Program.

### Audit criteria

We addressed the audit objective with the following line of enquiry:

Does Transport for NSW have an effective process to select and prioritise projects for TAP 3?

1. Does Transport for NSW have an effective process to select and prioritise projects for TAP 3?
  - a) Transport for NSW uses appropriate criteria to effectively select projects (interchanges) eligible for funding.
  - b) Transport for NSW effectively uses an appropriate process to prioritise projects.
  - c) Transport for NSW has incorporated lessons learnt from previous tranches.
  - d) The selection and prioritisation processes aligns with Transport for NSW's Disability Inclusion Action Plan 2018–2022.

### Audit exclusions

The audit did not:

- examine the effectiveness of the first and second tranches of the Transport Access Program
- examine issues related to individual project management for sites funded for improvement as part of TAP, including individual project delivery and project governance
- question the merits of government policy objectives.

### Audit approach

Our procedures included:

1. Interviewing key Transport for NSW staff
2. Examining:
  - Transport for NSW documentation, such as strategic business cases and plans
  - data on accessible public transport and patronage
  - relevant management reports for the subject areas relevant to the report.

The audit approach was complemented by quality assurance processes within the Audit Office to ensure compliance with professional standards.

### Audit methodology

Our performance audit methodology is designed to satisfy Australian Audit Standard ASAE 3500 Performance Engagements and other professional standards. The standards require the audit team to comply with relevant ethical requirements and plan and perform the audit to obtain reasonable assurance and draw a conclusion on the audit objective. Our processes have also been designed to comply with requirements specified in the *Public Finance and Audit Act 1983* and the *Local Government Act 1993*.

## **Acknowledgements**

We gratefully acknowledge the co-operation and assistance provided by officers of Transport for NSW and other agencies and non-government organisations we interviewed and who provided information to assist our work.

## **Audit cost**

Including staff costs, travel and overheads, the estimated cost of the audit is \$220,000



## Appendix eight – Performance auditing

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### What are performance audits?

Performance audits determine whether State or Local Government entities carry out their activities effectively, and do so economically and efficiently and in compliance with all relevant laws.

The activities examined by a performance audit may include a government program, all or part of an audited entity, or more than one entity. They can also consider particular issues which affect the whole public sector and/or the whole Local Government sector. They cannot question the merits of government policy objectives.

The Auditor-General's mandate to undertake performance audits is set out in section 38B of the *Public Finance and Audit Act 1983* for State government entities, and in section 421D of the *Local Government Act 1993* for Local Government entities.

### Why do we conduct performance audits?

Performance audits provide independent assurance to the NSW Parliament and the public.

Through their recommendations, performance audits seek to improve the value for money the community receives from government services.

Performance audits are selected at the discretion of the Auditor-General who seeks input from parliamentarians, State and Local Government entities, other interested stakeholders and Audit Office research.

### How are performance audits selected?

When selecting and scoping topics, we aim to choose topics that reflect the interests of parliament in holding the government to account. Performance audits are selected at the discretion of the Auditor-General based on our own research, suggestions from the public, and consultation with parliamentarians, agency heads and key government stakeholders. Our three year performance audit program is published on the website and is reviewed annually to ensure it continues to address significant issues of interest to parliament, aligns with government priorities, and reflects contemporary thinking on public sector management. Our program is sufficiently flexible to allow us to respond readily to any emerging issues.

### What happens during the phases of a performance audit?

Performance audits have three key phases: planning, fieldwork and report writing.

During the planning phase, the audit team develops an understanding of the audit topic and responsible entities and defines the objective and scope of the audit.

The planning phase also identifies the audit criteria. These are standards of performance against which the audited entity, program or activities are assessed. Criteria may be based on relevant legislation, internal policies and procedures, industry standards, best practice, government targets, benchmarks or published guidelines.

At the completion of fieldwork, the audit team meets with management representatives to discuss all significant matters arising out of the audit. Following this, a draft performance audit report is prepared.

The audit team then meets with management representatives to check that facts presented in the draft report are accurate and to seek input in developing practical recommendations on areas of improvement.

A final report is then provided to the head of the audited entity who is invited to formally respond to the report. The report presented to the NSW Parliament includes any response from the head of the audited entity. The relevant minister and the Treasurer are also provided with a copy of the final report. In performance audits that involve multiple entities, there may be responses from more than one audited entity or from a nominated coordinating entity.

## **Who checks to see if recommendations have been implemented?**

After the report is presented to the NSW Parliament, it is usual for the entity's audit committee to monitor progress with the implementation of recommendations.

In addition, it is the practice of Parliament's Public Accounts Committee to conduct reviews or hold inquiries into matters raised in performance audit reports. The reviews and inquiries are usually held 12 months after the report received by the NSW Parliament. These reports are available on the NSW Parliament website.

## **Who audits the auditors?**

Our performance audits are subject to internal and external quality reviews against relevant Australian and international standards.

The Public Accounts Committee appoints an independent reviewer to report on compliance with auditing practices and standards every four years. The reviewer's report is presented to the NSW Parliament and available on its website.

Periodic peer reviews by other Audit Offices test our activities against relevant standards and better practice.

Each audit is subject to internal review prior to its release.

## **Who pays for performance audits?**

No fee is charged for performance audits. Our performance audit services are funded by the NSW Parliament.

## **Further information and copies of reports**

For further information, including copies of performance audit reports and a list of audits currently in-progress, please see our website [www.audit.nsw.gov.au](http://www.audit.nsw.gov.au) or contact us on 9275 7100.

## OUR VISION

Our insights inform and challenge government to improve outcomes for citizens.

## OUR PURPOSE

To help parliament hold government accountable for its use of public resources.

## OUR VALUES

**Purpose** – we have an impact, are accountable, and work as a team.

**People** – we trust and respect others and have a balanced approach to work.

**Professionalism** – we are recognised for our independence and integrity and the value we deliver.

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