



Disability Action Plan

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	SUPERSEDES	PREPARED BY		APPROVED BY	
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Document History and Version Control

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V3.0	10/12/2015	Adam Pulitano	Updated action schedule
V4.0	01/12/2016	Robert Macey	Update for QLD and VIC operations
V5.0	01/02/2018	Adam Pulitano	Replacement of COO with MD
V6.0	24/12/2020	Paul Davies	Amended responsibilities in line with the structure
V7.0	29/07/2021	Paul Davies	Yearly compliance review.
V8.0	08/04/2022	Paul Davies	Yearly compliance review and removal of Long Distance Contract
V9.0	06/06/2025	Paul Davies	Yearly compliance review.

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1 Vision

The Pulitano Group of Companies (**Group**) is committed to providing an inclusive service that embraces and promotes diversity.

The Group have developed this Disability Action Plan to use as a strategy aimed at preventing discrimination against persons with disabilities.

2 Purpose

The Group recognizes the benefits of diversity in the broader community. The Group acknowledges that access to goods and services (including public transport) without discrimination is a basic human right for all people including people with disabilities. Further, as a provider of coach and bus services, the Group has a responsibility to endeavor to eliminate discrimination in the provision of its services.

It is for these reasons the company is committed to be a diversity leader in the passenger transport sector by:

Providing a diverse inclusive workplace in which everyone has the opportunity to fully participate and is valued for their distinctive skills, experiences and perspectives.

Incorporating diversity into its business practices through its social responsibility initiatives that aim to improve the quality of life for its workforce, their families, communities and society at large.

3 Policy Statement

The Group operates Urban, School, Charter, and Special Education services in Queensland and Victoria under contract to the respective state governments.

The Group seeks to:

- Be a market leader in the provision of transportation services to all our customers.
- Operate in a professional manner.
- Manage an up-to-date and well-maintained fleet of vehicles.
- Utilize equipment to suit specific customer needs.
- Employ people who are committed to the goals of the organisation.
- Value customer satisfaction and ensure their expectations are met.

The Group aims to:

- Provide superior bus and coach operations through the development of technology and staff training, resulting in a professional and experienced service to customers;
- Enhance customer service and industry reputation through a workforce that respects and reflects the diversity of our customers;
- Make a contribution to the economic, social and educational well-being of the communities we serve;
- Improve the quality of decision making, productivity and teamwork;
- Meet and exceed the relevant requirements of legislation and the board;
- Align with industry best practice; and
- Create an inclusive workplace culture.

4 Legal Context for Action Plan

Disability Discrimination Act 1992 (Cth)

The objects of the Disability Discrimination Act 1992 (Cth) are:

- (a) To eliminate, as far as possible, discrimination against persons on the ground of disability in the areas of:
 - (i) Work, accommodation, education, access to premises, clubs and sport; and
 - (ii) The provision of goods, facilities, services and land; and
 - (iii) Existing laws; and
 - (iv) The administration of Commonwealth laws and programs; and
- (b) To ensure, as far as practicable, that persons with disabilities have the same rights to equality before the law as the rest of the community; and
- (c) To promote recognition and acceptance within the community of the principle that persons with disabilities have the same fundamental rights as the rest of the community.

“Direct Disability Discrimination” is:

Treating people with a disability less favorably than people without the disability would be treated under the same or similar circumstances.

“Indirect Disability Discrimination” is:

A condition or requirement imposed which may appear the same for everyone, but which actually excludes or disadvantages some people because of their disability.

It will be discriminatory if a condition or requirement:

- requires a person to comply with a requirement; and
- because of a disability, the person does not or is not able to comply or although able to comply, would suffer disadvantage by doing so; and
- the requirement or condition is likely to have the effect of disadvantaging a person with a disability; and
- is otherwise unreasonable having regard to the circumstances of the case

The Disability Discrimination Act 1992 prohibits discrimination not only against people who have a disability, but also against a person who is an ‘associate’ of a person with a disability, e.g. a spouse, relative, carer, or a person in a business, sporting or recreational relationship with a person with a disability.

“Disability” is:

- (a) Total or partial loss of the person’s bodily or mental functions; or
- (b) Total or partial loss of a part of the body; or
- (c) The presence in the body of organisms causing disease or illness; or
- (d) The presence in the body of organisms capable of causing disease or illness; or
- (e) The malfunction, malformation or disfigurement of a part of the person’s body; or
- (f) A disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction; or
- (g) A disorder, illness or disease that affects a person’s thought processes, perception of reality, emotions or judgment or that results in disturbed behaviour and includes a disability that:
 - (i) Presently exists; or
 - (ii) Previously existed but no longer exists; or
 - (iii) May exist in the future; or
 - (iv) Is imputed to a person.

The Anti-Discrimination Act 1991 (QLD)

The Anti-Discrimination Act 1991 of Queensland also prohibits discrimination on the basis of: -

Sex, relationship status, pregnancy, parental status, breast feeding, age, race, impairment, religious belief or religious activity, political belief or activity, trade union activity, lawful sexual activity, gender identity, sexuality, family responsibilities, and association with, or relation to, a person identified on the basis on any of the above attributes.

Equal Opportunity Act 2010 (VIC)

The Victorian Equal Opportunity and Human Rights Commission protects people from discrimination and harassment in areas of public life such as workplaces, schools, clubs, shops or places that provide services.

In Victoria it is against the law for someone to discriminate against a person because of an attribute that the person has, or someone assumes they have. Protected attributes include age, breastfeeding, employment activity, disability, industrial activity, lawful sexual activity, marital status, parental status or status as a carer, physical features, political belief or activity, pregnancy, race, religious belief or activity, sex and sexual orientation.

Disability Standards for Accessible Public Transport 2002

The Disability Standards for Accessible Public Transport 2002 set out minimum requirements for public transport operators, with a twenty-year timetable for compliance.

All public transport coach and bus services are to comply fully with the relevant Standards as of the 31 December 2022.

5 Disability Action Plan and Strategy

Goal: Accessibility	Responsibility	Target Outcomes	Timeframe
Improve access to public passenger services for persons with physical disabilities	National Service Delivery Manager.	Vehicles fitted with ramps, lift access on nominated services, kneeling capability, handrails, allocated spaces, and signage.	Ongoing
To provide public awareness of disabled accessibility available, by using modern and advanced communication technologies. e.g. Website.	Managing Director.	Improve customer knowledge about accessibility options for persons with physical disabilities by updating websites, advertising and marketing	Ongoing

Goal: Training	Responsibility	Target Outcomes	Timeframe
Provide disability awareness training to all employees on induction	HR Department	Improve employee knowledge regarding the goals of the Act and the support and assistance available to persons with disabilities	Ongoing as part of induction process.
Provide specific training to drivers of local services	HR Department	Improve driver knowledge regarding the goals of the Act and the support and assistance available to persons with disabilities	Annually
Provide specific training to managers	HR Department	Improve knowledge of Managers regarding the goals of the Act and the support and assistance available to persons with disabilities	Annually
Incorporate Disability Awareness Training into induction procedures , for Sales staff and Operational staff.	HR Department	Induction procedures to be updated and implemented.	Training provided at commencement of employment.
Technical Training Drivers, , Operational staff, Managers and Mechanical staff receive training in operation of all end/or advice on equipment utilised for disability accessibility.	HR Department	Training and competence in the operation of all mechanical devices, equipment and programmes utilised in assisting disabled customers.	
Review of training programmes and processes in both Queensland and Victoria	HR Department	Ensure training provided to staff is up to date and relevant	Annually

Goal: Countenance of services	Responsibility	Target Outcomes	Timeframe
Integrate the goals and visions of this Disability Action Plan in broader company strategy and policies Integrate the goals and visions of this Disability Action Plan in broader company strategy and policies Integrate the goals and visions of this Disability Action Plan in broader company strategy and policies	National Service Delivery Manager	Ensure Business Continuity Strategy is aligned with the goals of this Disability Action Plan	Ongoing
	National Service Delivery Manager	Ensure relevant company policies and procedures are aligned with the goals of this Disability Action Plan	Ongoing
	National Service Delivery Manager	Ensure Incident Management Plan aligns with the goals of this Disability Action Plan	Ongoing

Goal: Monitor and Review	Responsibility	Target Outcomes	Timeframe
Ensure complaints and incidents are handled and responded to appropriately Ensure current policies and procedures are implemented and followed	Customer Service	All disability related Complaints, Non-Conformances, and Incidents will be recorded, and corrective action implemented as per current policies and procedures.	Ongoing
	Human Resources	Follow up instances of non-compliance.	Ongoing

Goal: Communication	Responsibility	Target Outcomes	Timeframe
Ensure that employees, customers and others at the workplace are aware of this Disability Action Plan and have an opportunity to provide feedback on it	Management/HR	The Group will notify employees, customers and others at the workplace of this Disability Action Plan and ensure that it is readily available. Employees, customers, and others at the workplace will have an opportunity to review and provide feedback on the Disability Action Plan	Annually

6 Measures and Accountabilities

All employees have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site.

The National Service Delivery Manager with the Human Resources Department will monitor the progress and report to the Board of Directors on the effectiveness of diversity related initiatives. The senior management team will make recommendations on diversity related initiatives, monitor and evaluate their implementation and ensure that diversity related programs of work are progressing correctly and successfully.

7 References

- Disability Discrimination Act 1992 (Cth)
- Human Rights and Equal Opportunity Commission Act 1986 (Cth)
- Anti-Discrimination Act 1991 (Qld)
- Equal Opportunity Act 2010 (Vic)
- Sex Discrimination Act 1984 (Cth)
- Racial Discrimination Act 1984 (Cth)
- Occupational Health and Safety Act 2004 (Vic)
- Work Health and Safety Act 2011 (Qld)
- Disability Standards for Accessible Public Transport 2002
- PG022 Anti-Discrimination Policy
- PG007 Workplace Harassment/Bullying Prevention Policy
- PG012 Disciplinary Policy