



**CITY OF CAPE TOWN
ISIXEKO SASEKAPA
STAD KAAPSTAD**

CITY OF CAPE TOWN'S UNIVERSAL ACCESS POLICY FOR ACCESSIBLE TRANSPORT

(Policy number 69977)

Approved by Council: 28 May 2025

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CITY OF CAPE TOWN
ISIXEKO SASEKAPA
STAD KAAPSTAD

Universal Access Policy for Accessible Transport in the City of Cape Town

UA Policy for Accessible Transport
Council Approved, 28 May 2025

Transport Planning & Network Management Department
Urban Mobility Directorate

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EXECUTIVE SUMMARY

Historically, the transport system which serves the residents of Cape Town and includes transport infrastructure (e.g. sidewalks, pedestrian crossings, roads and rail network), public transport facilities (e.g. public transport interchanges, bus stops and rail stations) and public transport services (e.g. minibus-taxis, busses and passenger rail) was not designed to accommodate Universal Access Passengers (UA Passengers). As a result, their access to socio-economic opportunities was severely limited, and inadvertently, it also made UA Passengers dependent on others for assistance to successfully navigate the public transport system.

However, since 2010, there has been increased awareness of UA Passengers and their specific travel requirements. This resulted in the introduction of new legislation by the National Department of Transport (NDoT) requiring the provision of accessible transport and the establishment of programmes and projects in the City's Urban Mobility Directorate that supports accessibility. Irrespective of this shift, UA Passengers have continued to face many challenges within the public transport system in the City.

This Universal Access Policy for Accessible Transport seeks to address barriers in the City's transport system through the application of various principles and policies in order to ensure transport infrastructure, facilities and services are accessible to as many people as possible, and specifically persons with disabilities.

This Policy sets the following vision for an accessible transport system in the City:

All people, regardless of ability, will be able to travel independently, safely and in a dignified manner on an integrated transport system with accessible infrastructure, facilities, and services.

This vision is aligned to the City's Integrated Development Plan (IDP), 2022-2027, and the Comprehensive Integrated Transport Plan (CITP), 2023-2028.

In order to achieve a more accessible transport system, this Policy identifies principles, key focus areas and policy directives and actions, to guide the implementation of universal access measures. These measures cover the spectrum of transport infrastructure and public transport facilities and services within the mandate of the City.

The provision of an accessible transport system provides important socio-economic benefits to UA Passengers and to society: it enables independent travel by all people regardless of ability, it enables the use of mainstream public transport services and it reduces the need for the provision of specialised transport services.

There are however major challenges that exist in realizing an accessible transport system. Considering these challenges, this Policy supports an incremental and phased approach, undertaken in a manner that is and sustainable and financially viable.

As part of the development of this Policy an implementation plan, with short, medium and long term actions will be developed. The monitoring, evaluation and review of the Policy and its implementation will be carried out on a continuous basis.

The City's Urban Mobility Directorate is committed to improving accessibility in the transport system and while Universal Access is already addressed in the Directorate's programmes, the Policy will be an important instrument to further improve accessibility across the travel chain.

TABLE OF CONTENTS

1.	INTRODUCTION.....	1
1.1	Problem Statement and the Transport Travel Chain.....	1
1.2	Accessibility Challenges in the Transport System.....	3
1.3	UA Passengers in Cape Town.....	3
2.	DESIRED OUTCOMES.....	6
3.	STRATEGIC INTENT	7
4.	ROLE PLAYERS AND STAKEHOLDERS	8
5.	REGULATORY CONTEXT	10
5.1	Legislative Context	10
5.2	Relevant Case Law	13
6.	POLICY PRINCIPLES	14
7.	KEY FOCUS AREAS, POLICY DIRECTIVES AND ACTIONS.....	15
8.	PERFORMANCE MONITORING and REVIEW.....	23

List of Figures

Figure 1: Travel Chain Elements	2
Figure 2: UA Policy within the City's framework of Policies, Strategies and Plans	8

List of Tables

Table 1: The Travel Chain.....	2
Table 2: Estimated number of Persons with Disabilities in the City	6
Table 3: Departments and functions in the Urban Mobility Directorate	9

Table 4: External Stakeholders 10

Table 5: Relevant Legislation, Strategies, Policies, and Standards 10

Table 6: Universal Access Policy Principles 14

Table 7: Key Focus Areas and Relevant Departments 16

Table 8: Policy Directives and Actions that support Key Focus Areas 17

ABBREVIATIONS

BRT	Bus Rapid Transit System
DaR	Dial-a-Ride
GABS	Golden Arrow Bus Services
IPTN	Integrated Public Transport Network
IRT	Integrated Rapid Transport
MFMA	Local Government: Municipal Finance Management Act, 2003 (Act No. 56 of 2003)
NDOT	National Department of Transport
NMT	Non-motorised Transport
PRASA	Passenger Rail Agency of South Africa
RIM	Road Infrastructure Management
SANS	South African National Standard
TIC	Transport Information Centre
UA	Universal Access
UDAP	Universal Design Access Plan
WCAG	Web Content Accessibility Guidelines

GLOSSARY

accessibility	Means a principle which refers to the removal of barriers that prevent people, including persons with disabilities, from entering, using, benefiting, participating in or making choices in relation to the transport system. This includes transport infrastructure, transport facilities and transport services.
accessible transport system	Refers to a transport system which is useable, accessible and participatory by all people, regardless of any disability or impairment.
assistive devices	Means a device, product, equipment or tool that is designed or adapted to enable persons with disabilities to participate in activities, tasks or actions.
City	Means the City of Cape Town, a municipality established by the City of Cape Town Establishment Notice No. 479 of 22 September 2000, issued in terms of the Local Government Municipal Structures Act, 1998 (Act No. 117 of 1998), or any structure or employee of the City acting in terms of delegated authority.
communication	Includes languages, display of text, Braille, tactile communication, large print, accessible multimedia as well as written, audio, plain-language, lip-speaking services, speech reading services, whisper interpretation, note-taking services and augmentative and alternative modes of communication. It also refers to means and formats of communication, including accessible information and communication technology.
disability	Means a person with a physical, psychosocial, intellectual, neurological or sensory impairment.
Dial-a-Ride	Means a dedicated kerb-to-kerb public transport service for persons with disabilities who are unable to access mainstream public transport services.
equality	Includes the full and equal enjoyment of rights and freedoms as contemplated in the Constitution of the Republic of South Africa, 1996.
impairment	Means a perceived or actual feature in the person's body or functioning that may result in limitation or loss of activity or restricted participation in society, and which results in a consequential difference of physiological or psychological experience of life.

MyCiti	Refers to the City's Bus Rapid Transit (BRT) system that provides a modern, safe, affordable and convenient bus service for residents and visitors.
persons with disabilities	Persons with disabilities include those who have perceived or actual physical, psychosocial, intellectual, neurological or sensory impairments which, as a result of various attitudinal, communication, physical and information barriers are hindered in participating fully and effectively in society on an equal basis with others.
public transport service	Means a scheduled or unscheduled service for the carriage of passengers by road or rail, whether subject to a contract or not, and where the service is provided for a fare or any other consideration.
reasonable accommodation	Refers to necessary and appropriate modification and adjustments, as well as assistive devices and technology, not imposing a situation, where needed in a particular case, to ensure persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms.
road reserve	Refers to the area contained within the statutory width of a road, and includes roadways, shoulders and sidewalks and the airspace above such roadways, shoulders and sidewalks and all other areas within the road reserve boundary.
Standards and Guidelines for Roads & Stormwater	Refers to the Standards and Guidelines document developed by the Urban Mobility Directorate to guide the planning, design and implementation of transport infrastructure and facilities. The document is based on national standards and guidelines.
transport infrastructure	Refers to infrastructure located in the road reserve (e.g. roads, overpasses, underpasses, sidewalks and pedestrian crossings) and in the rail reserve (e.g. rail network).
transport system	Consists of transport infrastructure (e.g. sidewalks pedestrian crossings, roads and rail network), transport facilities (e.g. public transport interchanges, bus stops and train stations and) and transport services (e.g. minibus-taxis, busses and passenger rail,).
universal access	Refers to the ability of all people to have equal opportunity and access to a service from which they can benefit.

Universal Access (UA) Passengers	Means individuals and persons with disabilities or impairments, who may require specific accommodation or consideration when using public transport and includes— • Minors (0-5 years); • The aged (65 years and older); • Life cycle passengers; • Female passengers; • Pregnant women; • Those who are limited in their movement by children • Signage passengers; and • Load-carrying passengers.
universal design	Means the design of products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialised design. "Universal design" shall not exclude assistive devices for particular groups of persons with disabilities where this is needed.

1. INTRODUCTION

1.1 Problem Statement and the Transport Travel Chain

Historically, the transport system which serves the residents of the City and includes transport infrastructure (e.g. roads, sidewalks, pedestrian crossings and rail network), public transport facilities (e.g. public transport interchanges and rail stations) and public transport services (e.g., minibus taxis, bus and passenger rail) was not designed to accommodate Universal Access Passengers (UA Passengers). As a result, their access to socio-economic opportunities was severely limited, and inadvertently, it also made UA Passengers dependent on others for assistance to successfully navigate the public transport system.

Due to the important role of transport in providing people access to social and economic opportunities and associated services, it is important that the accessibility of transport infrastructure and public transport facilities and services be addressed.

This Policy focuses on improvements to the transport infrastructure, facilities and services of the transport system in order to ensure the provision of an accessible system that will enable independent travel by UA Passengers. This is addressed in the Policy through various policy principles, policy directives and associated actions which have been identified to improve accessibility throughout the travel chain.

The development of this Policy was informed by input from Departments in the Urban Mobility Directorate and other City Departments, engagements with representatives from the disability sector and a review of international literature on how accessibility in the public transport system can be addressed and promoted. The literature also highlighted the complexity of achieving integrated and accessible public transport due to the range of transport infrastructure, facilities and modes in the system. As such, the challenges experienced in Cape Town is not unique.

The historic lack of provision for UA Passengers in the public transport system has resulted in various obstacles that may be experienced as part of different elements of the travel chain as shown in **Figure 1**, and discussed in **Table 1**. It is necessary that accessibility in each of these elements be addressed to ensure that a public transport journey can be undertaken, and successfully completed by UA Passengers. This requires a multi-disciplinary approach by the Urban Mobility Directorate and other City Directorates.

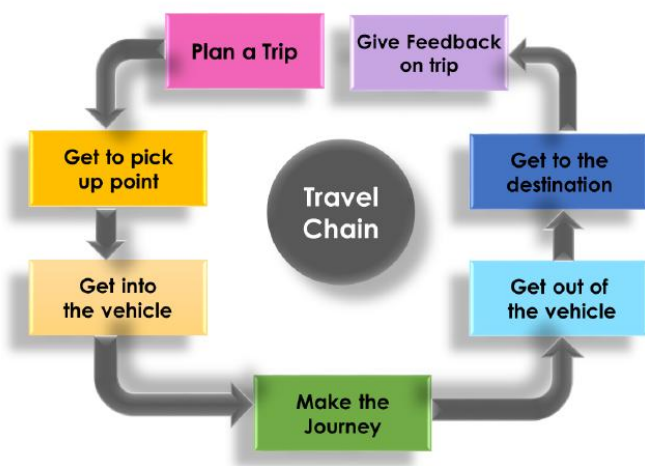


Figure 1: Travel Chain Elements

Table 1: The Travel Chain

Elements of the Travel Chain	Description
Plan a Trip	Trip planning generally takes place before someone leaves home to start his or her public transport journey. This phase involves a person accessing information about the accessibility of the entire Travel Chain, public transport services, multiple wayfinding options or any required connections to transfer to another transport mode so that they are able to complete their public transport journey seamlessly.
Get to a Pick-up Point	A person's trip starts and ends outside the public transport system. Therefore, accessible infrastructure is required to allow greater access for persons with disabilities, and to encourage public transport use by providing safe and well-connected accessible pedestrian infrastructure from home to a pick-up point, station or terminal, based on the principles of universal design.
Get into a Vehicle	A stop, station or terminal facilitates access of passengers into a vehicle at a kerbside. It must be designed to make it as safe, comfortable and accessible as possible for everyone to board and exit public transport vehicles.
Make the Journey	The in-vehicle/conveyance stage of a journey involves the passenger's interaction with the vehicle, other passengers and potentially its driver. During this stage, the passengers also boards the vehicle, travels to their destination stop or station and arrives.

Get out of a Vehicle	On-board real-time information about upcoming stops or stations must be conveyed through visual displays and audible announcements to make it as easy as possible for persons with disabilities to identify stops or stations and exit the vehicle at their chosen destination.
Get to the Destination	Where relevant and possible, real-time information about public transport services and any required connections at the destination, should be available to assist passengers to effectively integrate travel options and safely complete their public transport journey.
Provide Feedback on the Journey	Following completion of the journey, passengers must be able to provide feedback on journey experiences.

1.2 Accessibility Challenges in the Transport System

Prominent challenges that UA Passengers face with the public transport system, includes:

- a) Lack of accessible transport infrastructure, e.g. sidewalks with dropped kerbs and accessible public transport facilities e.g. public transport interchanges;
- b) The geographic footprint of MyCiTi services is currently limited to Phase 1 and the N2 Express Services with the result that persons with disabilities are dependent on Dial-a-Ride services, which is oversubscribed;
- c) Non-City controlled public transport services and related infrastructure are not accessible e.g. PRASA/Metrorail trains and stations, GABS buses and minibus-taxis;
- d) Information regarding public transport services is limited and wayfinding to and from stops and stations is often non-existent; and
- e) A lack of awareness regarding persons with disabilities and their access requirements that should be accommodated on public transport services.

1.3 UA Passengers in Cape Town

UA Passengers is broader than persons with disabilities as defined in the National Land Transport Act, 2009 (Act No. 5 of 2009), as “people whose mobility is restricted by temporary or permanent physical or mental disability, the blind or partially sighted and the deaf or hard of hearing”, but for the purposes of this Policy also include the following categories:

Minors	Children between the ages of 0-5.
The aged	Elderly people, who are more likely to have access needs, which limit their ability to use public transport vehicles as they are currently designed. People over the age of 65 usually fall in this category.
Life cycle passengers	These are customers who have additional transport needs by virtue that they happen to be in a particular stage of the human life cycle e.g. children older than 5 and adults younger than 65 that require assistance when travelling on public transport.
Female passengers	Whilst safety and security affects all passenger groups and all genders, it should be noted that female passengers are particularly at risk of crime and abuse.
Pregnant women	Pregnant women who are likely to have access needs, usually women in their last three months of pregnancy.
Those who are limited in their movements by children	People travelling with small children may also have access needs that public transport systems need to cater for.
Signage passengers	Customers who, for reasons of illiteracy, age or lack of familiarity with the language of the signage, are unable to access enough information to use the transport system effectively.
Load carrying passengers	People carrying bags, luggage, or goods of a size that means that they may benefit from accessibility features. In the South African context this category is quite important to low-income communities.

These categories of people are included in the term UA Passengers as they may have specific needs with special access and transport requirements that public transport systems need to accommodate in order for the system to be accessible and useable.

The number of UA Passengers in Cape Town has been determined by utilizing data obtained from the 2011 South African National Census, summary information from the 2022 South African National Census and information obtained from the National Household Travel Survey (NHTS) 2020. This represents the various categories that will benefit from UA improvements in the transport system, including public transport facilities and services.

Based on the initial census results of 2022, the City has a population of approximately 4,772,846 people, the third largest metropolitan area in South Africa.

To determine the number of persons with disabilities in the City, a person is regarded, according to the census, as having a disability if they reported any of the following degrees of difficulty in the six functional domains of seeing, hearing, communicating, walking/climbing stairs, remembering or concentrating and self-care.

The number of UA Passengers in the City is estimated at 838 112 (17,56%) based on the 2022 census information.

Utilizing the six functional disability domains for both censuses, the disability status indicator is computed as prescribed by the United Nations (UN) disability index computation guidelines:

- a) A person who reported 'some difficulty' in at least two domains of functioning;
- b) A person who reported 'a lot of difficulty' in any one of the six domains of functioning;
and
- c) A person who reported 'unable to do' in any one of the six domains of functioning.

The key findings from this assessment reflects the following:

- a) Within the City the majority of people with disability are either sight impaired (34,9%) or walking impaired (21,3%);
- b) The statistics reflect that 38,7% of people with a disability use public transport in the form of train, bus or minibus taxi as their main mode of transport to work with 53,2% using private vehicles. Only 7,5% of people with a disability walk to work according to the NHTS; and
- c) According to the information, 20% of people with a disability use public transport in the form of train, bus or minibus taxi as their main mode of transport to an education facility with 26,3% using private vehicles. However, 52,9% of people with a disability walk to education facilities according to the NHTS 2020 information.

Using the NHTS statistics and the most recent census information for the City, the profile in **Table 2** of the estimated number of persons with disabilities was compiled based on the percentages in the NHTS for people with any disability or degree of disability.

Table 2: Estimated number of Persons with Disabilities in the City

Disability of Passenger	Percentage (NHTS)	Population 2022 Census
Seeing	34,9%	292 809
Walking	21,3%	178 231
Memory	14,9%	125 186
Hearing	11,6%	97 603
Self-care	9,6%	80 628
Communication	7,6%	63 654
Total		838 112

(Estimated figures based on Census 2022 information)

2. DESIRED OUTCOMES

This Policy seeks to bring about an accessible transport system by reducing and eliminating barriers through the application of design principles and guidelines that ensure transport infrastructure and public transport facilities and services are accessible to as many people as possible, and specifically accessible by persons with disabilities.

Based on the above approach, and input received during stakeholder engagements, the following vision for an accessible transport system in Cape Town was developed:

All people, regardless of ability, will be able to travel independently, safely and in a dignified manner on an integrated transport system with accessible infrastructure, facilities and services.

The provision of an accessible transport system provides important socio-economic benefits insofar as it enables independent travel by all people regardless of ability. It also enables the use of mainstream public transport services and reduces the need for the provision of specialised transport services.

However, specific challenges that exist in realising an accessible public transport system must be noted:

- a) Existing transport infrastructure and public transport facilities across the City's municipal area are not accessible;
- b) Important public transport services and facilities provided by PRASA/ Metrorail, GABS and minibus-taxis are not universally accessible; and
- c) The City only has direct control over the transport infrastructure located in the road reserve, public transport interchanges and the MyCiTi and Dial-A-Ride related facilities and services.

Considering the many challenges that exists in realising an accessible transport system, the Policy supports an incremental and phased approach, undertaken in a manner that is financially viable and sustainable.

This Policy focuses on addressing accessibility in relation to transport infrastructure located in the road reserve and public transport facilities and services **which the City has direct control over** i.e. public transport interchanges, MyCiTi and Dial-a-Ride services. However, the policy principles, directives and actions can also be applied to other rail-based (e.g. PRASA/ Metrorail) and road-based (e.g. GABS, minibus-taxis, e-hailing services and metered taxis) public transport services in order to improve accessibility for UA Passengers. PRASA/ Metrorail is responsible for the commuter rail infrastructure (rail lines, overhead power lines, signaling), facilities (rail stations) and the commuter rail services.

3. STRATEGIC INTENT

This Policy is a supporting and guiding document in the larger strategic and policy suite of the City. This Policy seeks to support integration between higher order strategies, policies and plans of the City, including the CIP and the IPTN as shown in **Figure 2**. The CIP sets the vision for transport and includes the transport programmes and projects.

This Policy also supports the objectives of the City's Integrated Development Plan (IDP), insofar the creation of an accessible transport system will bring about a more spatially integrated and inclusive City, where people have more equitable access to economic opportunities and social amenities, and where the physical barriers to inclusion and well-being are reduced. This Policy also supports the notion that the City is committed to investing in public infrastructure to address the injustice of apartheid spatial planning.

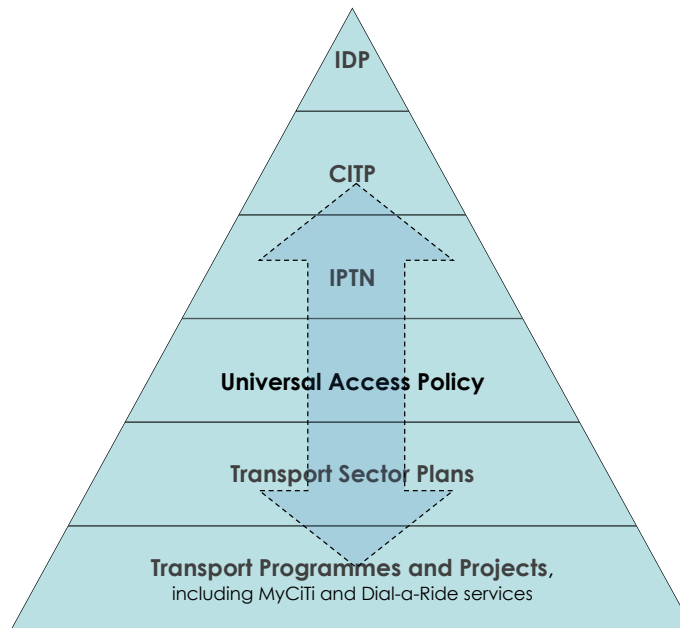


Figure 2: UA Policy within the City's framework of Policies, Strategies and Plans

4. ROLE PLAYERS AND STAKEHOLDERS

Accessibility in the travel chain influences the travel behavior and mode choice of UA Passengers, and more specifically persons with disabilities. Improving accessibility in the travel chain impacts a vast range of role players and stakeholders.

While the City's Urban Mobility Directorate is responsible for the overall planning, design, implementation, maintenance, management and monitoring of transport infrastructure located in the road reserve and public transport facilities and services, i.e. public transport interchanges, MyCiTi and Dial-A-Ride services, other City Directorates and external stakeholders also have a role to play in bringing about an accessible public transport system. Other City Directorates that play an important role in establishing an accessible transport system, includes:

- Spatial Planning and Environment Directorate:** The Urban Planning and Design Department undertakes City-wide, district and local area spatial planning and develops urban design guidelines that support a more accessible City form;
- Safety and Security Directorate:** The Directorate is responsible for Law Enforcement and Traffic Services that supports the safety and security of passengers; and
- Energy Directorate:** The Directorate is responsible for public lighting which includes street lights.

The following tables provide an overview of internal and external stakeholders.

Table 3: Departments and functions in the Urban Mobility Directorate

Department	Functions
Transport Planning and Network Management	The Department is responsible for planning and managing the integrated transport network, including the development of the CITP and associated long-term strategic planning. The Department also plans systems and design networks, with a focus on the Integrated Public Transport Network (IPTN), the regulation of movement of traffic on the road network, improving the safety for all road users and management of on-street parking.
Transport Infrastructure Implementation	The Department implements all new construction and capital investment in new roads infrastructure, public transport infrastructure and facilities and non-motorised transport facilities including walking and cycling.
Roads Infrastructure Management	The Department is responsible for managing and maintaining the road network, including road resurfacing and maintenance of the stormwater system, informal road networks, public transport and non-motorised transport networks, street furniture within the road reserve and for maintaining an accurate asset inventory.
Public Transport	The Department manages public transport vehicle operating contracts for the MyCiTi bus service and the Dial-a-Ride service which caters for people with special needs. In addition, it also manages the fare collection systems, management systems of vehicle fleets and public transport facilities, as well as industry transition matters and public transport enforcement.
Transport Shared Services	Transport Shared Services manages and provides transport-related business systems and information, human resources, support services, business administration and programme monitoring, business planning and development, communication, customer relations, and change and stakeholder management to enable service delivery.
Transport Finance	The Department is responsible for budget allocation, financial control and reporting in accordance with finance principles.

The implementation of an accessible transport system also impacts important external stakeholders as reflected in **Table 4**:

Table 4: External Stakeholders

Stakeholder Group	Functions
Civil Society	Organisations of and for persons with disabilities e.g. people with physically disabilities, people with sensory disabilities and people with cognitive disabilities.
Public Transport Operators	Operators responsible for rail and road based public transport services i.e. PRASA/Metrarail, GABS, minibus-taxi associations, e-hailing services and metered-taxi operators.
Government	Western Cape Government
	National Department of Transport

5. REGULATORY CONTEXT

5.1 Legislative Context

This section provides a brief overview of the relevant international, national, provincial and City legislation, strategies, policies, standards and other documents relevant to UA. The documents are listed in **Table 5**.

Table 5: Relevant Legislation, Strategies, Policies and Standards

Instrument	Relevance to the Policy
International Convention	
UN Convention on the Rights of Persons with Disabilities (CRPD) and its Optional Protocol	The primary purpose of the Convention is to promote, protect and ensure the full and equal enjoyment of human rights and fundamental freedoms by all persons with disabilities and to promote their inherent dignity. South Africa is a signatory to the Convention.
National Legislation	
The Constitution of the Republic of South Africa, 1996	In terms of section 9 and 10 of the Constitution, the State may not unfairly discriminate directly or indirectly against anyone on one or more grounds including race, gender, sex, pregnancy, marital status, ethnic or social origin, colour, sexual orientation, age, disability, religion, conscience, culture, language and birth, and everyone has inherent dignity and the right to have their dignity respected and protected.

National Land Transport Act, 2009 (Act No. 5 of 2009)	The Act places a specific responsibility on the municipal sphere of government in section 11(1)(c)(xiv) for “ensuring there is provision for the needs of special categories of passengers in planning and providing public transport infrastructure, facilities and services to meet their needs, in so far as possible by the system provided for mainstream public transport”. Section 3(1)(d) of the Regulations for Minimum Requirements for the Preparation of Provincial Land Transport Frameworks, 2011, specifically requires that the “transport of special categories of passengers must receive special attention”. Furthermore, the Act also sets requirements for planning authorities to produce universal access plans and promote accessible transport. Specifically, in terms of section 11(1)(c)(xiv), it requires municipal authorities to “[ensure] that there is provision for the needs of targeted categories of passengers in planning and providing public transport infrastructure, facilities and services to meet their needs, in so far as possible by the system provided for mainstream public transport”. The Act defines “targeted categories of passengers” as persons with disabilities, and the elderly, pregnant women, scholars, young children and those who are limited in their movements by children. In terms of section 10A, the Act also determines that planning authorities must take steps in performing their functions under the Act to promote accessible transport and non-motorised transport. For the purposes of the aforementioned section, “accessible transport” is defined as “transport that is accessible to all persons in the area, including, but not limited to, targeted categories of passengers, pedestrians and cyclists to their intended destinations in a safe and convenient manner, and in relation to infrastructure means the design of facilities that are usable by all people to the greatest extent possible, with or without the need for adaptation or specialised design.”
Employment Equity Act, 1998 (Act No. 55 of 1998)	The Act seeks to provide for employment equity in order to promote the constitutional right of equality in the workplace.

	In terms of section 15, a designated employer is required to provide for “reasonable accommodation for people from designated groups in order to ensure that they enjoy equal opportunities and are equitably represented in the workforce”. The term “reasonable accommodation” in this context refers to “any modification or adjustment to a job or working environment that will enable a person from a designated group to have access to or participate or advance in employment”. The Act is further supported by the publication of a Code of Good Practice on the Employment of Persons with Disabilities to set standards for the employment of persons with disabilities in the workplace.
Promotion of Equality and Prevention of Unfair Discrimination Act, 2000 (Act No. 4 of 2000)	The Act gives effect to section 9 read with item 23(1) of the Constitution and seeks to prevent and prohibit unfair discrimination and harassment, promote equality and eliminate unfair discrimination. Section 6 of the Act provides for the prevention and general prohibition of unfair discrimination and determines that “neither the State nor any person may unfairly discriminate against any person”. Furthermore, section 9 prohibits unfair discrimination on the ground of disability, and determines that, subject to section 6, no person may unfairly discriminate against any person on the ground of disability, including— • Denying or removing from any person who has a disability, any supporting or enabling facility necessary for their functioning in society; • Contravening the code of practice or regulations of the South African Bureau of Standards that govern environmental accessibility, and • Failing to eliminate obstacles that unfairly limit or restrict persons with disabilities from enjoying equal opportunities or failing to take steps to reasonably accommodate the need of such people.
White Paper on the Rights of Persons with Disabilities	Promotes accelerated transformation and redress with regard to full inclusion, integration and equality for persons with disabilities.

National Frameworks, Plans, Strategies and Policies	
• National Land Transport Strategic Framework (2023 - 2028); • National Strategic Framework on Universal Design and Access (2021);	
• National Strategic Framework on Reasonable Accommodation (2021); • Action Plan to Guide the Provision of Accessible Public Transport Systems in South Africa, 2009 • Implementation Strategy to Guide the Provision of Accessible Public Transport Systems in South Africa, 2009 • Public Transport Strategy (2007); and the • White Paper on National Transport Policy (1996).	
National Standards, Regulations, Technical Requirements and Guidelines	
• SANS 10400-S: 2011: The Application of the National Building Regulations Part S: Facilities for Persons with Disabilities; • National Technical Requirement (NTR) 1: Pedestrian Crossings (Part 1), 2016; • National Technical Requirement (NTR) 1: Pedestrian Crossings (Part 2), 2016; and • NMT Facility Guidelines, 2014.	
Provincial Government Western Cape	
Public Transport Policy Statement for Special Needs Passengers in the Western Cape, 2007	The Policy sets out the Provincial Government's statement for the provision of public transport with respect to special needs users (SNU's) in the Western Cape. The Policy also addresses accessibility in commuter rail and road based public transport servicers.
City of Cape Town	
• Integrated Development Plan (IDP); • Comprehensive Integrated Transport Plan (CITP); • Integrated Public Transport Network (IPTN) Plan 2032; • Municipal Spatial Development Framework (MSDF), 2023; • Universal Design Access Plan (UDAP), 2014; • Parking Policy for the City of Cape Town, 2020; and • Standards and Guidelines for Roads & Stormwater, Revision 0.4, Sept 2024.	

5.2 Relevant Case Law

Apart from the legislation, case law exists that confirm the rights of persons with disabilities to full and equal enjoyment of human rights and prohibits unfair discrimination on the ground of disability.

6. POLICY PRINCIPLES

The following policy principles were developed based on the input received during engagements with the respective Departments in the Urban Mobility Directorate and the disability sector. These principles will guide the overall approach to the establishment of an accessible public transport system in the City.

Table 6: Universal Access Policy Principles

	Policy Principle	Description
1	Accessibility	In order for UA Passengers to travel independently on the transport infrastructure and public transport facilities and services must be universally accessible. Such independent travel must include the various elements of the travel chain, namely: a) Planning a journey; b) Travelling to public transport pick-up points (or any other destination); c) Getting into public transport vehicles; d) Undertaking the journey (including transfers between different modes of transport); e) Alighting the public transport vehicle; f) Travelling to the end-destination; and g) Providing feedback on the journey.
2	Meeting statutory requirements	The provision of accessible transport is a statutory requirement in terms of various legislation, strategies, policies, guidelines, standards and plans. As such, the provision of an accessible transport system must be addressed in the higher order strategic transport documents that directs transport programmes and projects in the City and in the programmes, projects and initiatives undertaken by the different departments in the Urban Mobility Directorate.
3	Mainstreaming universal access	The development of an accessible transport system must be addressed in the programmes, projects and initiatives of all the Departments in the Urban Mobility Directorate.

4	Financial sustainability	The implementation of an accessible transport system must be undertaken in a manner that is financially viable and sustainable. Decision making regarding the provision of transport services must be guided by the necessary appraisal studies to ensure compliance with the MFMA.
5	Service optimization	Where MyCiTi services are implemented and accessible transport services are provided that can accommodate UA Passengers, the Dial-a-Ride service will be withdrawn.
6	Safety and Security	UA Passengers must be able to undertake their journey in a manner that is safe and secure from origin to destination. As such, the safety and security of UA Passengers must be addressed in all the elements of the travel chain.
7	Stakeholder engagement	Regular engagement with the disability sector, and other relevant stakeholders will support the development and implementation of an accessible transport system in the City, through: a) Increasing awareness of the access requirements by users with different disabilities; and b) Receiving input on improvements required to the transport system to address accessibility.
8	Awareness raising	The creation of an accessible transport system must include awareness raising of UA Passengers and their access requirements through campaigns, education and sensitivity training.
9	Capacitation and skills development	Capacity building through training, skills development and sensitivity training must be undertaken in the Urban Mobility Directorate to improve awareness of persons with disabilities and their respective access requirements. Capacity building should be outsourced if necessary.
10	Monitoring and Evaluation	Monitoring and evaluation of the accessibility of transport infrastructure, MyCiTi facilities and services and the Dial-A-Ride service must be undertaken to determine compliance with the design standards and standard operating procedures.

7. KEY FOCUS AREAS, POLICY DIRECTIVES AND ACTIONS

This section provides an overview of the Key Focus Areas, the Policy Directives and Actions that support accessible transport. Eight Key Focus Areas were identified in which the different Policy Directives and Actions are grouped together.

- 1) **Undertake Transport Planning and Capacity Building** to create an accessible transport system for all;
- 2) Provide **Public Transport Facilities and Vehicles** that support accessible public transport services;
- 3) **Undertake Public Transport Operations in a manner that is financially sustainable and enable travel that is safe, reliable, accessible, affordable and convenient**;
- 4) Develop an accessible transport system through **Phased Implementation of Infrastructure Programmes and Projects** within available budget;
- 5) **Undertake Marketing and Communication** that encourage the use of accessible public transport services;
- 6) **Undertake Stakeholder Engagement** to promote an accessible transport system for all;
- 7) Ensure the **Safety and Security of Public Transport Users** to further the use of accessible public transport services; and
- 8) **Undertake Monitoring and Evaluation** of transport infrastructure, MyCiTi facilities and services and the DaR service to determine compliance with design standards and standard operating procedures.

Table 7: Key Focus Areas and Relevant Departments

Key Focus Areas	Responsible Department(s)
1) Undertake Transport Planning and Capacity Building to create an accessible transport system for all.	Transport Planning and Network Management Public Transport
2) Provide Public Transport Facilities and Vehicles that support accessible public transport services.	Public Transport Transport Infrastructure Implementation
3) Undertake Public Transport Operations in a manner that is financially sustainable and enable travel that is safe, reliable, accessible, affordable and convenient.	Public Transport Transport Shared Services (Business Planning)
4) Develop an accessible transport system through Phased Implementation of Infrastructure Programmes and Projects within available budget.	Transport Planning and Network Management Transport Infrastructure Implementation Transport Infrastructure Management

5) Undertake Marketing and Communication that encourage the use of accessible public transport services.	Transport Shared Services (Transport Communications)
6) Undertake Stakeholder Engagement to promote an accessible transport system for all.	Transport Planning and Network Management Public Transport Transport Shared Services
7) Ensure the Safety and Security of Public Transport Users to further the use of accessible public transport services.	Public Transport Safety and Security Directorate
8) Undertake Monitoring and Evaluation of transport infrastructure, MyCiTi facilities and services and the DaR service to determine compliance with design standards and standard operating procedures.	Transport Planning and Network Management Transport Infrastructure Implementation Road Infrastructure Management Public Transport

The policy directives were developed based on the input received during engagements with the respective Departments in the Urban Mobility Directorate and the disability sector, review of international literature and the review of the UA Policy approved in 2014. The policy directives support the policy principles.

Table 8: Policy Directives and Actions that support Key Focus Areas

Key Focus Area 1: Undertake Transport Planning and Capacity Building to create an accessible transport system for all.		
	Policy Directive	Action
1.1	The provision of an accessible transport system must be addressed in the Comprehensive Integrated Transport Plan (CITP) and the Integrated Public Transport Network Plan (IPTN).	Address the provision of an accessible transport system in the Comprehensive Integrated Transport Plan (CITP) and its related plans and strategies, including the Integrated Public Transport Network Plan (IPTN).
1.2	Development of a more accessible built environment and transport system must be addressed in the	Engage with the Spatial Planning and Environment Directorate to ensure that the Municipal Spatial Development Framework

	City's spatial planning and urban design policies, guidelines and plans.	(MSDF), District Spatial Plans and urban design policies, guidelines and plans support the development of an accessible transport system.
1.3	The application process for new developments must address UA requirements as per the City's Municipal Planning By-law, 2015 and City design standards at the appropriate stage.	• TIA's to address the provision of parking for persons with disabilities in new developments in terms of the Municipal Planning Bylaw. • Address UA requirements in new developments through the development application process in line with the latest Standards and Guidelines for Roads and Stormwater.
1.4	Develop the Universal Design Access Plan (UDAP) and undertake the annual review and update.	• Develop the Universal Design Access Plan (UDAP) for MyCiTi. • Undertake the annual review and update of the UDAP.
1.5	Undertake capacity building in the Urban Mobility Directorate in order to address UA across the travel chain.	• Support staff capacity building through training, skills development, sensitivity training and awareness raising. Use of a service provider to be considered for training, skills development and sensitivity training. • Investigate the need for staff resourcing dedicated to dealing with UA as part of the staff complement.
Key Focus Area 2: Provide Public Transport Facilities and Vehicles that support accessible public transport services.		
2.1	Ensure that public transport vehicles which form part of MyCiTi and DaR services support accessible public transport services.	• Review and update vehicle specifications in line with NDoT requirements. • Ensure that public transport vehicles are maintained and operated as required. • Ensure that "next stop" information is visually displayed on the screen and audible announcements made. • Evaluate maintenance requirements due to ramp deployment at stops or stations. • Include appropriate vehicle specifications in contracts for acquisition of new fleet.

		Fleet acquisition to be based on the original SANS 10370 regulation. The current review of this regulation, should it be amended, will not form part of already advertised tender specifications.
2.2	Ensure that new Public Transport Interchanges (PTI's), MyCiTi stops and stations are universally accessible.	- Ensure that relevant design standards and requirements are included in the planning, design and construction of new public transport facilities. - Ensure that special consideration is given to the correct application of tactile paving to assist people with visual impairments.
2.3	Ensure that up to date information regarding MyCiTi services is displayed at MyCiTi stops and stations.	Provide up to date operational information on routes and time of arrival/departure of MyCiTi services.
Key Focus Area 3: Undertake Public Transport Operations in a manner that is financially sustainable and enable travel that is safe, reliable, accessible, affordable and convenient.		
3.1	Ensure that eligible UA Passengers are able to migrate from DaR to MyCiTi and other public transport services.	- Encourage DaR users to migrate to MyCiTi and other public transport services. - Implement the programmes and projects to support an improved accessible public transport system for all users.
3.2	Review and update the eligibility criteria for DaR users.	Review eligibility criteria for use of the DaR service based on the recommendations contained in the DaR Business Plan.
3.3	Ensure training of MyCiTi and DaR staff in order to provide support for UA Passengers that use the services.	- Ensure continuous training and skills development of staff that is required to assist persons with disabilities. - Provide training for drivers to recognise physical or mobility disabilities and vision impairment which may affect the ability of passengers to hail and enter/ exit a bus.
3.4	Evaluate the functionality of the MyCiTi and DaR system to ensure financial viability of the services provided.	Undertake necessary changes to routes and time of arrival/departure of MyCiTi and DaR services to ensure financial viability of the services provided.

		Undertake necessary changes to the MyCiTi and DaR fleet to ensure financial viability of the services provided.
3.5	Investigate the implementation of an Account Based Ticketing (ABT) system for MyCiTi and DaR services.	Investigate the implementation of an Account Based Ticketing (ABT) system which would increase service accessibility and ease of use.
Key Focus Area 4: Develop an accessible transport system through Phased implementation of Infrastructure Programmes and Projects within available budget.		
4.1	UA improvements of transport infrastructure and facilities must be implemented through a phased approach.	- UA improvements of the transport system must be implemented through the existing programmes and projects of the Urban Mobility Directorate subject to budget availability. - Infrastructure programmes and projects undertaken in the Urban Mobility Directorate must endeavour to incorporate UA improvements, where feasible.
4.2	Develop Standards and Guidelines that addresses accessible transport infrastructure and facilities.	- Undertake periodic review and update of the Standards and Guidelines for Roads & Stormwater. - Create awareness of the Standards and Guidelines for Roads & Stormwater.
4.3	The planning, design and implementation of new transport infrastructure and facilities, including new NMT facilities, must be undertaken in line with the Standards and Guidelines for Roads & Stormwater.	- Designs for new NMT facilities (including UA facilities) must comply with the latest Standards and Guidelines for Roads & Stormwater. Where compliance is not feasible, the District Manager RIM must be consulted for guidance. - Where NMT infrastructure is provided by a developer (as required by the City through a service agreement or land use condition of approval) the developer must comply with the UA requirements, including provision of the required tactile paving, as stipulated by the City and the relevant standards.

4.4	Safe and accessible pedestrian crossings must be provided for persons with disabilities.	The latest Standards and Guidelines for Roads & Stormwater and other applicable standards must be applied in the planning and design of pedestrian crossings.
4.5	Existing transport infrastructure and facilities must be incrementally retrofitted to be universally accessible to the greatest extent possible.	The latest Standards and Guidelines for Roads & Stormwater and other applicable standards must be applied when retrofitting of existing transport infrastructure and facilities is undertaken.
4.6	Existing transport infrastructure and facilities must be maintained to ensure that it is functional, clean and safe to use by persons with disabilities.	- Existing transport infrastructure and facilities must be maintained to the minimum standard required to ensure that it is functional, clean and safe to use. - Engage with the Energy Directorate regarding the placement of light poles on sidewalks to ensure that effective clear width is maintained.
Key Focus Area 5: Undertake Marketing and Communication that encourage the use of accessible public transport services.		
5.1	Ensure that the information regarding MyCiTi and DaR services is accessible.	- Ensure that persons with disabilities can access information for MyCiTi and DaR services in multiple formats. - Assess the accessibility of the MyCiTi website and App in terms of WCAG requirements. - Undertake the necessary improvements of the MyCiTi website and App to ensure compliance with WCAG requirements.
5.2	Ensure that up to date information for MyCiTi and DaR services is available.	- Ensure that information provided by the TIC Call Centre, DaR and MyCiTi website is up to date. - Investigate the feasibility to provide live operational information to MyCiTi users via web platforms and social media.
5.3	Ensure that MyCiTi buses, stations, stops and facilities and DaR vehicles are identifiable.	Undertake periodic assessments of MyCiTi buses, stations, stops and facilities and DaR vehicles to ensure that vehicles and facilities are clearly marked with MyCiTi and DaR branding.

Key Focus Area 6: Undertake Stakeholder Engagement to promote an accessible transport system for all.		
6.1	Undertake periodic engagements with representatives of the disability sector for feedback regarding the accessibility of the public transport system.	Representatives from the Urban Mobility Directorate must endeavour to attend and participate in the meetings of the Transversal Committee on UA.
6.2	Engage with public transport operators via the Inter-Modal Planning Committee (IPC) to improve accessibility of facilities and services.	Engage with PRASA/ Metrorail, Western Cape Government (Contracting Authority for GABS) and other public transport operators via the Inter-Modal Planning Committee (IPC) to identify the programmes and plans to provide accessible facilities and services.
Key Focus Area 7: Ensure the Safety and Security of Public Transport Users to further the use of accessible public transport services.		
7.1	Ensure a safe and secure environment for all passengers.	- Undertake an assessment of current safety and security measures at MyCiTi stations, stops, facilities and services. - Engage with the Safety and Security Directorate to investigate increasing the presence of law enforcement officers at public transport stops and stations located in crime hot spot areas, within available resources. - Correct driver behaviour that compromises pedestrian safety and the use of pedestrian facilities, including parking on sidewalks that obstruct pedestrian movement.
Key Focus Area 8: Undertake Monitoring and Evaluation of transport infrastructure, MyCiTi facilities and services and the DaR service to determine compliance with design standards and standard operating procedures		
8.1	Ensure that MyCiTi and DaR services rendered by operators comply with the applicable Standard Operating Procedures (SOP's), guidelines and standards relating to UA.	Undertake assessments of MyCiTi and DaR services to ensure compliance with the applicable Standard Operating Procedures (SOP's), guidelines and standards.

8.2	Ensure that new transport infrastructure and facilities comply with the guidelines and standards relating to UA.	• Assess designs of new transport infrastructure and facilities to ensure compliance with applicable guidelines and standards. • Investigate the appointment of an independent access consultant to review designs of major transport projects to ensure compliance with applicable guidelines and standards.
8.3	Maintain a process of capturing feedback or complaints from persons with disabilities regarding performance of public transport services.	• Utilise the Customer Relationship Management System managed by the Transport Information Centre (TIC) to capture feedback or complaints relating to public transport services. • Address complaints received via the TIC through remedial actions, where feasible.

8. PERFORMANCE MONITORING and REVIEW

This Policy will be reviewed every five years, or if there are legislative changes which require an earlier review of the Policy. The performance monitoring of this Policy will be captured within the Service Delivery Business Implementation Plan of the Urban Mobility Directorate.