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Disability and Transport Standards Section
Land Transport Policy Branch
Department of Infrastructure, Transport, Regional Development and Communications
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Reform of the Disability Standards for Accessible Public Transport

Carers NSW welcomes the opportunity to provide a submission to the Department of Infrastructure, Transport, Regional Development and Communications (the Department) in response to the *Reform of the Disability Standards for Accessible Public Transport: Consultation Regulation Impact Statement* (Consultation RIS). This brief submission highlights the need to ensure accessibility on public transport to enable people living with disability to achieve optimal independence, and minimise potential strain on carers who provide physical or financial with transport. Furthermore, the submission aims to highlight the need to ensure current reforms are carer-inclusive, acknowledging the role of carers in supporting people with disability to achieve optimal community engagement.

Carers NSW is the peak non-government organisation for carers in NSW. A carer is any individual who provides care and support to a family member or friend who has a disability, mental illness, drug and/or alcohol dependency, chronic condition, terminal illness or who is frail. Carers NSW is part of the National Carer Network and a member of Carers Australia. Our vision is an Australia that values and supports all carers, and our goals are to:

- Be a leading carer organisation in which carers have confidence
- Actively promote carer recognition and support
- Actively support carers to navigate a changing service landscape that will be characterised by ongoing policy reform
- Promote connected community experiences and opportunities for carers that are inclusive of diverse carer groups
- Lead and advocate for carer-specific and carer-inclusive policy making, research and service delivery
- Continue to be a quality-driven, responsive and carer-focused organisation.

Carers NSW thanks the Department for the opportunity to provide feedback on proposed reforms to the Disability Standards for Accessible Public Transport (the Standards). Carers NSW supports reforms that aim to improve the accessibility and safety of public transport for people with disability. Barriers to access can increase the need for support with transport from family and friend carers, which may not be sustainable for carers and can reduce the independence of people with disability.

Carers NSW believes in the importance of autonomy and self-determination for people with disability and is supportive of policy and practice that facilitates their meaningful participation in community life. While we recognise that not all people with disability receive informal support or would identify as having a carer, or carers, family members and friends are important in the lives of all Australians, and the Australian Bureau of Statistics (ABS) reports that the majority of Australians with disability who need

assistance receive at least some of that assistance from a family member or friend; in many cases, on a daily basis.¹ More than one third (37.4%) of primary carers also have a reported disability themselves.²

Carers NSW believes that reforms to the Standards should be clearly regulated, with obligations to comply for all providers of public transport to ensure that all people with disability and their carers have the ability to move freely about in the community and engage in economic, wellbeing and social activities without additional risks, barriers or costs.

Increasing independence through accessibility

Carers NSW believes that increased accessibility of transport infrastructure and information, as well as improvements in transport worker communication, are likely to increase the independence of people with disability in accessing public transport, in turn reducing the support that they require from formal services or informal carers.

Findings from the 2018 Survey of Disability, Ageing and Carers (SDAC) indicate that informal carers provide a majority of the support to people with disability where assistance with transport, or tasks related to transport such as mobilising, communicating and reading, is required.³ Of people living with disability who report requiring support with transport, 83.5% received this support from an informal support person, with 17.7% receiving daily support and 42.6% receiving this support weekly.

Informal carers also more likely than formal support providers to assist with a number of other tasks associated with navigating or accessing public transport. Of people requiring support with mobility, approximately 84.8% received support from informal providers compared to only 22.6% receiving support from formal providers. Of those reporting a need for support with communication or reading and writing, 88.1% and 84.8% reported receiving support with this from informal providers respectively.

Public transport that is not adequately accessible may limit the ability of people with disability to utilise it independently. In these cases, carers may be required to physically accompany the person living with disability to ensure that they can safely reach their destination, or provide or fund alternative transport options such as private transport or accessible taxis. This may place additional financial strain on carers who often already experience financial disadvantage or require carers to forgo their own educational, economic, health and wellbeing activities to support the person they care for to attend to their own activities in the community.

Carers NSW believes that in order to ensure optimal independence for people with disability, the Standards should be updated to ensure coherence with current accessibility standards and evidence based best practice. This is likely to reduce the need for assistance with transport and transport-related activities which is most commonly provided by carers.

¹ Australian Bureau of Statistics (2019) *Survey of Ageing, Disability and Carers 2018*, TableBuilder Dataset, available online at: www.abs.gov.au

² Ibid.

³ Ibid.

Carer recognition and inclusion

Carers NSW believes that given that many people living with disability receive support from an informal carer to assist them with accessing public transport, carers should be better recognised and considered in the proposed reform, as per the *Carer Recognition Act (Cth) 2010*. This may include:

- Embedding carer awareness training and training on how to communicate with carers in any framework of staff training that aims to improve the public transport experience of people with disability, recognising the role of carers as supporters of people with disability when accessing public transport;
- Consideration of carers in the calculation of priority seats, given that a carer may need to be seated nearby to a person with disability during transit to provide care and support as needed;
- Consideration of carers in the development of emergency egress provisions to ensure that provisions adequately meet their needs, as well as the person that they care for, given that they will likely be required to stay with the person that they care for during an emergency to provide ongoing support.

Additionally, where public transport does not meet broader accessibility standards carers may have no choice but to put themselves or the person they care for at risk of physical harm in order to support the person they care for. Carers NSW believes that in order to improve the service experience and ensure the safety of people with disability and their carers, reforms that aim to improve the accessibility of public transport should be implemented.

Conclusion

Carers NSW supports reforms to the Standard, which aim to improve access to public transport for people with disability and their carers. These reforms are likely to increase the independence of people with disability and enable optimum participation of people with disability and their carers within their communities.

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Yours sincerely,



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