



**Submission on the  
Reforms of the Disability Standards  
for Accessible Public Transport 2002**

**August 2022**

## About Carers Tasmania

Carers Tasmania is the Peak Body representing the more than 80,000 informal carers (hereafter carers) in the state.

Carers Tasmania's vision is for an Australia that values and supports carers.

Our mission is to work to improve the health, wellbeing, resilience and financial security of carers and to ensure that caring is a shared responsibility of family, community and government.

Our values drive everything we think, say, and do.

- **Carers first** – we listen to what carers need, commit to their desired action plan, and deliver results that matter most to carers
- **Care in all we do** – we care for our work, about each other, about Tasmania's family and friend carers, and the bigger world we all share
- **Integrity always** – we are transparent, act ethically, own when things don't go to plan and do what we say we will
- **Quality every time** – we don't accept 'good enough' because carers deserve our very best every time
- **Speed that matters** – we are agile and don't put off what can be done today

These values represent how we engage with and serve carers, how we work with each other, and our commitment to the broader community. Carers Tasmania encourages partnership with government and the health and community sectors to enhance service provision and improve the conditions for family or friend carers through policy development, research and advocacy.

Carers Tasmania has offices in Moonah, Launceston and Burnie.

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## Background

Carers Tasmania acknowledge the Aboriginal and Torres Strait Islander peoples as the traditional owners of the land of lutruwita/Tasmania and we pay our respects to Elders past and present. We acknowledge and support people of all genders, sexualities, cultural beliefs, and abilities and understand that carers in Tasmania, whilst sharing the common theme of caring for a family member or friend, are diverse individuals with varying beliefs, experiences, and identities.

Carers Tasmania is the Peak Body representing the more than 80,000 informal carers in the state.

Carers provide unpaid care and support to someone with disability, mental ill health, a chronic or life limiting condition, alcohol or other drug dependence or who are frail or aged. Carers are predominantly family members, but may also be friends, neighbours, or colleagues. Informal carers are not to be confused with paid support workers who are often called 'carers', with the difference being that support workers are fully employed and remunerated with all the benefits of employment. On the contrary, informal carers perform their caring duties without remuneration, other than minimal carer payments and allowances from the Australian Government. The term 'informal carers' does not automatically include kinship or foster carers, unless they care for a child with disability, mental ill health or a condition as noted above.

In addition to representing carers through the Peak Body activities, Carers Tasmania provides support to carers living in Tasmania through its service delivery arm, Care2Serve. The Commonwealth Carer Gateway program is delivered through Care2Serve, as are other supports and services, such as the Tasmanian Government's Home and Community Care program.

The Carer Gateway program provides a range of services and supports for carers which are designed to build resilience, increase wellbeing, improve quality of life, and sustain carers to effectively continue their caring roles. The available supports include the provision of information, advice and referrals, holistic identification of carer strengths and needs through a carer support planning process, professional counselling, peer support, and coaching which aims to support carers in achieving specific goals.

Care2Serve, through the Carer Gateway, has capacity to fund certain instances of planned, practical support services such as in home respite, personal care, domestic assistance, and meal preparation. Care2Serve may also fund items such as laptops to assist carers who are studying or trying to enter the workforce. Care2Serve also coordinates the provision of emergency support during instances where a carer may be unable to provide the care that they usually do, resulting from unexpected illness or injury of the carer.

## Introduction

Carers Tasmania welcomes the opportunity to provide feedback to the Australian Department of Infrastructure, Transport, Regional Development and Communications in response to the *Stage 2 Consultation Regulation Impact Statement (RIS) of the Disability Standards for Accessible Public Transport 2002*.<sup>1</sup>

Our submission supports a broad range of improvements around access to transport for people with disability to further promote their fundamental rights to independence, community participation and quality of life. Furthermore, our submission aims to advocate for current reforms to be carer-inclusive and acknowledge the significant roles of carers in supporting people with disability, highlighting that by improving community access to people with disability, the lives of carers will also be improved to some extent.

More than four million people with disability live in Australia, equating to 18% of the Australian population.<sup>2</sup> The Australian Bureau of Statistics (ABS) Survey of Disability, Ageing and Carers 2018 found that 26.8% of people in Tasmania have disability, which is significant when compared to the rest of the nation.<sup>3</sup> Tasmania consists of a few larger cities, but the population is also dispersed through many country towns and rural communities. Transport is challenging for many people living in Tasmania, but significantly more challenging for people with disability.

Australia has obligations to uphold under international human rights instruments, such as the UN Convention on the Rights of Persons with Disabilities, which was established to “promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and promote respect for their inherent dignity.”<sup>4</sup> All people, including people with disability and their carers have the right to independence and to participate fully in the community, but for this to occur, supports are required and the barriers to access must be reduced or removed entirely.

Access to suitable public transport is critical to enable full community participation. People with disability face many challenges when using public transport, such as lack of access to physical infrastructure, difficulty in accessing suitable information, and challenges with safely navigating a successful public transport journey. In circumstances where a person with disability is not afforded equitable access, service, or safety in relation to other passengers, then discrimination, frustration, confusion, and harm may occur.

People who have limited mobility because of age or disability often place a high value on being able to access public transport close to where they live or near their planned destination, but access to the right type of transport isn't always easy. For

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<sup>1</sup> <https://www.infrastructure.gov.au/sites/default/files/documents/reforms-disability-standards-for-accessible-public-transport-2002-stage2-consultation-regulation-impact-statement-march2022.pdf>

<sup>2</sup> 1 Australian Government Australian Institute of Health and Welfare, *People with Disability in Australia 2020: In Brief*, 15 November 2021, <https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia2020-in-brief/contents/about-people-with-disability-in-australia-2020-in-brief>.

<sup>3</sup> <https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release#disability>

<sup>4</sup> <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-persons-disabilities>

example, in some areas there may be an issue of distance or other obstacle such as a hill or non-disability accessible path in between a person's home and a bus stop making it difficult or impossible for the person to navigate to the bus stop. In Tasmania, there are also areas with limited taxi services (despite having access to the Transport Access Scheme/taxi concession) or suitable disability access vehicles. The person may not be comfortable or understand how to use Uber or other rideshare options. Community transport is another popular option, but it also brings challenges because it is a highly sought-after service which understandingly requires much notice for bookings. Therefore, presently in Tasmania, using public transport can be stressful, impractical, and for some people, even impossible.

## **Response to the reforms**

Carers Tasmania are broadly supportive of the comprehensive list of stage two reform items which aim to improve access to public transport for people with disability and their carers. We are hopeful that these reforms will increase the independence of people with disability to enable them and their carers optimum participation within their communities.

We call on local councils and both state and federal governments to invest into these improvements to better support access for people with disability, their carers and the broader community.

Whilst these reforms take focus on the important task of improving access and quality of life for people with disability, these reforms have potential to make positive change to others in the community, including the informal carers of people with disability. Many people living with disability receive support from an informal carer to assist them with accessing public transport, therefore Carers Tasmania believe that carers should be better recognised and considered in the proposed reform, as per the Commonwealth Carer Recognition Act 2010<sup>5</sup> and in Tasmania, the proposed Carer Recognition Bill 2022<sup>6</sup>. The awareness of carer needs must be embedded into these reforms to enable a suitable and holistic approach to supporting people with disability and their support networks.

Organising and navigating transport options can be difficult, stressful, and generally requires a lot of preparation and planning. By enabling better access to transport for people with disability, their independence will be increased and upheld and the responsibilities on carers may be reduced. Additionally, where public transport does not meet broader accessibility standards, carers and/or the person they care for may be at risk of physical harm if there are no other safer or more appropriate transport options available. We believe that to improve the service experience and ensure the safety of people with disability and their carers, reforms that improve the accessibility and safety of public transport should be implemented.

We note that people were encouraged to have their say on this important topic by participating in various online surveys, in writing, or via phone, via email or audio recording. We highlight that the only real-time consultations available on this topic

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<sup>5</sup> <https://www.legislation.gov.au/Details/C2010A00123>

<sup>6</sup> [https://www.parliament.tas.gov.au/Bills/Bills2022/pdf/33\\_of\\_2022.pdf](https://www.parliament.tas.gov.au/Bills/Bills2022/pdf/33_of_2022.pdf)

were held online. Whilst we applaud consultation on this very important topic, we believe that online consultation as a standalone method is inadequate due the large number of people with disability living in Tasmania. Tasmania also has high rates of low literacy and digital literacy levels. We strongly recommend there be adequate opportunity for face-to-face consultation in accessible parts of the community for people with disability and for these to be effectively advertised and promoted.

Implementing improved standards on the following items will have a significant impact on the ability and experience of people with disability, and consequently their carers, in accessing public transport:

- Updated standards on school bus accessibility for people with disability, noting that dedicated school busses are exempt from certain physical access requirements under current transport standards
- A nationally consistent definition of accessibility and internationally consistent symbols for disability access and deafness
- Consistent standards around audible queues and messaging on transport rather than just visual alerts, including location and next stop information
- Improved standards around timely provision of information and real time communication
- Consistent standards around signage – including braille, font size and location
- Improved web booking systems
- Improved standards around mobility boarding points and consistent education around methods to flag that additional assistance is required for access
- Improved standards around bathroom requirements such as ambulant toilets, emergency call buttons and other supports
- Allocated spaces in transport waiting areas and parking spaces -which are also accessible to the carers of people with disability
- Consistent standards about accessible seats (reserved) for people with disability and their carers
- Standards on the appropriate and safe storage of mobility aids on public transport

The implementation approach of these amended and/or newly introduced standards will be critical to successfully improving access to transport for people with disability. Community based education is an essential factor which must be undertaken in the implementation stages, and it must include co-design/co-delivery by people with disability and their carers.

Improved standards, specifications, policy, and process will provide a significant level of safeguards and enhancements, but a whole-of-community approach is required to truly make significant improvements in transport access and related experiences for people with disability and their carers.

We are concerned that there is no requirement to report data on compliance with the Transport Standards and that there is no nationally consistent data of this sort in existence. We strongly believe that there must be a requirement to report on compliance or non-compliance with Transport Standards and it must be nationally

consistent, as a safeguard to the adhering to the commitments for improved transport access for people with disability. Without this approach, there is no accountability to compliance reporting.

The use of equivalent access provisions will ensure that when required, flexible and innovative approaches can be implemented to provide the right support for people with disability to access and utilise public transport. To ensure that operators can be certain that their equivalent access solutions are compliant with Transport Standards and are able to sufficiently meet the needs of people with disability, greater clarity is required.

Carers Tasmania commend the significant progress towards improving access to transport for people with disability, and we believe these reforms will play an important step in increasing the independence of people with disability and enable them greater participation in their community. These improvements will also have flow-on effects to the carers of people with disability.