

30 June 2023

Department of Infrastructure, Transport, Regional Development and Communications  
GPO Box 594  
Canberra ACT 2601

## 2022 Review of the Disability Standards for Accessible Public Transport 2002

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 2022 Review of the *Disability Standards for Accessible Public Transport 2002*. 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 support 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 New South Wales (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.

Thank you for accepting our submission. For further information, please contact Jade Alexander, Policy and Development Officer at [REDACTED]

Yours sincerely,



Elena Katrakis  
CEO  
Carers NSW

## Introduction

Carers NSW thanks the Department of Infrastructure, Transport, Regional Development and Communications (the Department) for the opportunity to provide feedback on the Government's 2022 Review (Review) of the Disability Standards for Accessible Public Transport 2002 (the Standards). Carers NSW has responded to previous consultations on the reforms to the Disability Standards for Accessible Public Transport and continues to support reforms that aim to improve the accessibility and safety of public transport for people with disability and their carers. While Carers NSW commends the Australian Government for working to reduce discrimination for people living with disability on public transport services, and has been working with Transport for NSW to improve transport accessibility through the Accessible Transport Advisory Committee, we believe that there are further opportunities improve the accessibility of public transport.

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.<sup>1</sup> Additionally, approximately 1 in 3 carers live with disability themselves, almost twice the rate of the general population.<sup>2</sup>

## Providing accessible safe public transport increases independent living

Public transport that is not adequately accessible may limit the ability of people with disability to utilise it independently. Findings from the 2018 Survey of Disability, Ageing and Carers (SDAC) indicated that of people with disability who required support with transport, 83.5% receive this support from an informal support person, with 17.7% receiving this support daily and 42.6% receiving this support weekly.<sup>3</sup> Informal carers are 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.<sup>4</sup> 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.<sup>5</sup>

To support the person they care for, 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. As 1 in 3 carers also live with a disability themselves, providing support to utilise public transport may also place additional physical strain on carers which may result in worsening of their own health conditions or disability.<sup>6</sup>

Carers NSW continues to believe 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. Furthermore, while person-centred approaches to disability

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<sup>1</sup> Australian Bureau of Statistics (2019) *Survey of Ageing, Disability and Carers 2018*, TableBuilder Dataset, available online at: [www.abs.gov.au](http://www.abs.gov.au)

<sup>2</sup> Ibid.

<sup>3</sup> Ibid.

<sup>4</sup> Ibid.

<sup>5</sup> Ibid.

<sup>6</sup> Ibid.

inclusion are intended to optimise usage and prioritise the rights and needs of people with disability, the Standards should also recognise the role of carers as partners in care and ensure that the Standards – such as allocated space, and doorway, stairs, and toilets sizes – reflect the common need for a carer.

## **Prioritising reform to reduce discrimination**

Carers NSW acknowledges the extent of the work required to address discrimination against people with disability and their carers throughout the numerous public transport networks, but is concerned that in some transport infrastructure and services may not have met the required levels of compliance with the Standards by December 2022.

Carers NSW is aware of recent discussion at the June 2023 Infrastructure and Transport Ministers Meeting held in Perth concerning the Stage 2 reform areas and implementation arrangements, including the possibility of developing a more flexible implementation approach with alternative compliance pathways in place of prescriptive timeframes as currently set out in the Transport Standards. Carers NSW commends the government for recognising the need to improve public transport for people with disability and their carers, but is concerned that this approach, which does not appear to include prescribed and legislated timeframes may further extend rather than reduce the time until public transport reforms result in full compliance with the Transport Standards. It may also result in inconsistencies between states and territories, especially if some states or territories do not prioritise reforms.

Carers NSW urges the Government to recognise that delays and inaction on improving public transport accessibility hinders the independence of people with disability and increases the need for supports from carers. Improving services will ensure people with disability have the ability to move freely about in the community and engage in economic, wellbeing and social activities without additional risks, barriers or costs.

## **Conclusion**

Carers NSW supports the Government's continued focus on improving transport accessibility through the *2022 Review of the Disability Standards for Accessible Public Transport 2002*. Carers NSW believes that such reforms are likely to increase the independence of people with disability, enabling them to achieve and enable optimum participation within their communities, and in so doing help reduce the need for carers to facilitate the use of public transport. However, believes that there must be ongoing clear guidance and prescribed timelines to ensure that this important work is prioritised in all states and territories.