

15 May 2017

Point to Point Implementation  
Freight, Strategy and Planning  
Transport for NSW  
Haymarket NSW 1240

## **Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017**

Carers NSW would like to thank Transport for NSW for the opportunity to comment on the proposed *Point to Point Transport (Taxi and Hire Vehicles) Regulation 2017*.

This submission refers to carers as individuals who provide informal care and support to a family member or friend who has a disability, mental illness, drug or alcohol dependency, chronic condition, terminal illness or who is frail aged. Carers NSW is the peak non-government organisation for carers in NSW and a member of the National Network of Carers Associations. Our vision is an Australia that values and supports all carers, and our goals are to work with carers to improve their health, wellbeing, resilience and financial security; and to have caring recognised as a shared responsibility of family, community, and government.

Point to point transport is essential for many carers and the people they care for. According to the Survey of Disability, Ageing and Carers approximately 44% of people with disability do not use public transport even though it is available in their local area.<sup>i</sup> Thus the needs of many people with disability and those who are frail aged must either be met by private transport or via point to point transport. In many cases, carers accompany the person they care for regardless of the mode of transport they utilise.

Carers NSW commends the proposed regulation for its focus on ongoing developments to ensure a safe, transparent and accountable point to point transport network. This submission will draw attention to issues in regards to disability training and fares that have the potential to negatively impact carers and the people they care for.

Carers NSW is supportive of the clauses that protect people with disability and their carers. In particular, Carers NSW believes that competence in loading, unloading and restraint of wheelchairs is essential. However, under this clause providers will be able to determine the specific training that drivers undertake. Carers NSW recommends that there be specific outcomes set by the regulator for all training to achieve consistency across providers.

Similarly, Carers NSW believes that prohibiting a driver to refuse to carry an assistance animal and requiring drivers to prioritise a person in a wheelchair over one that is not, are vital to protect people with disability. However, Carers NSW would also like to see these clauses extended to ensure all drivers have a broader understanding of disability and ageing beyond physical traits, in order to appropriately assist customers with vision, hearing, or

mobility impairments and mental illness and intellectual disability. This is particularly important given that not all people with disability utilise wheelchair accessible taxis.

Community transport is an essential service for many carers and the people they care for. However, Carers NSW is concerned about the potential impacts of these regulations for Community Transport Providers (CTPs) that are not under contract with Transport for NSW. Individualised funding arrangements within the disability and aged care sectors are creating significant instability within the sector and changing the way these services are funded, in many cases reducing providers' flexibility to cover fleet purchase and upkeep and adequately subsidise fares.

With the introduction of the \$1 passenger levy for booked services, providers will either be required to absorb this cost or reflect it in the fares passengers pay. Carers NSW is concerned that this will create unnecessary administrative costs for CTPs or contribute to the financial burden of transport costs many carers and the people they care for already experience.

Depending on the provider, some carers can either travel free when accompanying the person they care for, while other providers require carers to pay the full fare. Carers NSW is concerned that the passenger levy may further increase the costs carers are already required to pay when accompanying the person they care for.

Furthermore, we have heard from carers who are concerned that current NDIS packages are insufficient to cover community transport costs for the person they care for. There is potential that this levy could contribute to making community transport trips even more unaffordable. While Carers NSW acknowledges that exemptions are available in remote areas and for small providers Carers NSW recommends that CTPs should be exempt from the passenger levy.

Carers NSW is concerned about the impact of unregulated maximum fares for booked services. Carers and the people they care for are frequent users of booked services whether it be community transport, taxis or other modes of point to point transport. Carers NSW recommends that if unregulated maximum fares are to continue, then consistent information is required in terms of how the fare was calculated and why fares may vary.

Thank you for accepting our submission. For further information regarding this submission, please contact Freya Saich, Policy and Development Officer, on [REDACTED] or [REDACTED]

Yours sincerely



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CEO  
Carers NSW

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<sup>i</sup> Australian Bureau of Statistics (2017) *Disability, Ageing and Carers, Australia: New South Wales, 2015*, Canberra.