

Older Persons Transport and Mobility Plan 2018- 2022

NCOSS Submission

January 2019

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About NCOSS

The NSW Council of Social Service (NCOSS) works with and for people experiencing poverty and disadvantage to see positive change in our communities.

When rates of poverty and inequality are low, everyone in NSW benefits. With 80 years of knowledge and experience informing our vision, NCOSS is uniquely placed to bring together civil society to work with government and business to ensure communities in NSW are strong for everyone.

As the peak body for health and community services in NSW we support the sector to deliver innovative services that grow and evolve as needs and circumstances evolve.

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Introduction

NCOSS is pleased to comment on the draft Older Person's Transport and Mobility Plan 2018-2022 ("the Plan").

We welcome the focus by Transport for NSW (TfNSW) on accessibility and the needs of older consumers. This Plan recognises that concrete actions are needed to fulfil the priority of "Getting around" (transport options) in the NSW Ageing Strategy. It also complements TfNSW's Disability Inclusion Action Plan 2017-2021 (DIAP), to which [NCOSS responded](#) in 2017.

Access to affordable, reliable and frequent public transport and community transport is particularly important for older people experiencing poverty and disadvantage, who have limited other options. Public and community transport are means to staying independent, active and engaged, and is critical to the health and well-being of older people.

NCOSS acknowledges the work already undertaken to make transport accessible for older people. However, there are significant opportunities for improvement to ensure that the final Plan is effective in driving its outcomes and objectives.

This submission makes brief comment about the need for:

- actions to incorporate clearer specifications so that progress can be measured;
- actions to make reference to related processes across Government;
- additional actions relating to accessibility and affordability, and
- strengthened actions relating to rural and regional transport.

Need for enhanced specification of actions

TfNSW's move to more clearly defined measurement indicators (such as Opal Card data from seniors) is welcome. However more detailed actions could strengthen the Plan's effectiveness by creating accountability around the progress and implementation.

It is recommended that consideration is given to:

1. Clearly differentiating which actions are already taking place (actions marked as 'continue') and which are specifically occurring as a result of the Plan.
2. Enhance the actions in the Plan to include:
 - a. mechanisms/processes for implementation;
 - b. indicative timeframes for implementation;
 - c. outcomes; and
 - d. performance indicators.
3. The inclusion of a commitment to regularly publishing publically available progress reports on the Plan.

Need for actions to reference broader policy agendas and related processes

To ensure an integrated response to the transport needs of older people, it is important for actions in the Plan to link to and be consistent with other related processes.

For example:

Action	Comment
Work collaboratively with local governments to determine if existing policy and program settings best reflect the growing ageing population in terms of walkable infrastructure and safe shared paths for pedestrians and cyclists. ¹	In addition to referring to Local Governments, actions relating to walking and cycling should make specific reference to the Greater Sydney Commission, Infrastructure NSW, and UrbanGrowth. This would encourage better integration of active transport linkages (walking and cycling) into local, district and metropolitan planning processes.
Explore opportunities to minimise platform gaps and height differences to enable better access to and from transport vehicles for older customers. ²	To be effective this action should refer to and align more explicitly with the requirements under the Disability Standards for Accessible Public Transport ³ , referring to the modernisation of these Standards.

Additional actions relating to accessibility and affordability of transport

In our comments above, we refer to the Disability Standards for Accessible Public Transport. To ensure compliance with and accountability to the Standards, we recommend the inclusion of a specific action in the Plan, whereby TfNSW commits to:

Ensure all public transport across NSW is fully accessible by 2022, as required under the national Disability Transport Standards.

Transport for NSW continues to offer eligible seniors concession fares on public transport which are the most generous in Australia.⁴

NCOSS emphasises the concessions must continue to include the Pensioner Excursion Ticket.

¹ Future Actions for Transport for NSW, Better Infrastructure and Fleet, Plan p. 13

² Future Actions for Transport for NSW, Better Infrastructure and Fleet, Plan p. 14.

³ See Disability Standards for Accessible Public Transport' Part 33.2, 8.2.

⁴ What transport has achieved so far, Affordable and Safe Transport, Plan p. 13.

Actions relating to rural and regional transport

During our [2018 regional consultations](#), social and community service organisations strongly expressed that the lack of available and suitable transport options has a compounding effect on people experiencing disadvantage in rural and regional NSW. Organisations told us that available community transport is insufficient, overcomplicated and under-funded. At present, poor access to transport is curtailing people's opportunities, health and quality of life. Indeed, the absence of this link can even cause unemployment, ill-health, mental illness and poverty.⁵ For older people, access to health services and recreational and social opportunities are particularly important.

The [NCOSS Election Platform](#) recognises the crucial linkage role played by transport, particularly in rural and regional areas.⁶ The NCOSS Election priorities guide our feedback on regional transport actions. We comment on three actions below:

Action: Address geographical transport disadvantage in parts of rural and regional NSW through delivery of NSW Community Transport Services.⁷

NCOSS strongly endorses this action, but emphasises its implementation requires an investment of significantly greater funding, and the ability to use it flexibly. Our Election Platform calls on the Government to:

- Commit to long term funding of the NSW Community Transport Program, with a 20% increase in funds received by service providers each year for five years.
- In consultation with the sector, deliver all NSW transport assistance funds more directly to communities so that local groups can together come up with ways to deploy their community transport resources efficiently and sustainably.

Greater funding is needed because the Community Transport Program (CTP) has faced increased demand due to the ageing population, people living independently for longer, and decreasing availability of informal supports. The advent of the NDIS has also meant that those that don't qualify for an NDIS package but are no longer able to access previous services and supports, are turning to community Transport providers to assist them to access mainstream services.

Despite this increased demand, Community Transport providers have experienced a decrease in funding due to the cessation of the Community Care Support Program (CCSP) with the closure of the Department of Ageing, Disability and Home Care in June 2018.⁸ Adding to funding uncertainty, both the Commonwealth Home Support Program (My Aged Care) grants and CTP contract agreements with TfNSW will expire in 2020.

Community transport providers tell us that the current level of Government support per trip is prohibitively low, and can even undermine the ability of an organisation to provide a service at all. Providers cannot charge the full

⁵ NCOSS (2018) [What we heard: Insights from NCOSS regional community consultations](#) 2018.

⁶ NCOSS (2018) [2019 Election Platform: No Child in Poverty](#).

⁷ Future Actions for Transport for NSW, Better Infrastructure and Fleet, Plan p. 15.

⁸ This funding was transferred to the National Disability Insurance Agency even though a significant percentage of people who were eligible for CCSP are not expected to be eligible for the NDIS.

gap between funding and cost to the vulnerable people they are trying to support. Trips provided on a cost recovery basis would require substantial contributions from users, and the price of travel would be unaffordable for most.⁹ This is the case particularly where distances to services and supports are long. For example:

“The major [medical] hubs for specialists are Coffs Harbour, Lismore, Ballina, Gold Coast and Brisbane. We have clients needing to travel to these areas every day... we are subsidised around \$31 per trip by the government. The average cost of a trip to Coffs Harbour from Grafton is \$176 return, trips to the Gold Coast and Brisbane can run as much as \$500 return. Even with multiple people in cars the cost is still prohibitive.” – Transport service provider, Clarence Valley Northern NSW

Financial sustainability could be improved through less prescriptive contracts. Our members inform us that current CTP contracts prevent providers from taking advantage of commercial opportunities, or replacing vehicles before 7 years or 300,000km, or upgrading/changing their fleet to match demand.

Action: Design better rural transport services to provide access to key destinations such as hospitals and medical centres.¹⁰

To implement this action, TfNSW should work with the Ministry of Health to extend the Isolated Patient Transport and Accommodation Assistance Scheme (IPTAAS). IPTAAS is a critical service for older people on low incomes in remote areas who have to travel to access health treatments, including older people. NCOSS regional consultations identified many barriers to the effectiveness of IPTAAS. For example, payments must often be made upfront and IPTAAS often does not cover travel to services for drug and alcohol treatment, or psychology and social work services. Our Election Platform therefore calls on the Government to:

Extend the Isolated Patient Transport Accommodation Assistance Scheme (IPTAAS) by \$5 million over 5 years, and:

- Include community transport providers in eligible NSW areas
- Include upfront payment to service providers and clients as an option in the Scheme
- Expand the range of specialist services covered by the scheme to include more flexibility regarding mental health and addiction treatment services
- Undertake an awareness campaign encouraging health services and the community to make use of the IPTAAS service

⁹ NCOSS. 2018, *Way Forward to Inclusive Service System*, p.25

¹⁰ Future Actions for Transport for NSW, Better Infrastructure and Fleet, Plan p. 15.

Continue trials of flexible and demand responsive services in metropolitan and rural settings and monitor benefits for older customers¹¹.

NCOSS supports this action, but calls for particular attention to be paid to the effect of the trial in regional areas, ensuring transport options are not diminished.

Our members report the On-Demand program is having unintended consequences in some regional trials, due to lack of consultation with the local community service and community transport sector about the design and location of the trials. For example, we have heard that:

- In Ulladulla, the Nowra to Canberra trip is being picked up by the new service, but the bus cannot take people with disability or more complex needs, thus not lightening the load of community transport providers.
- In Moree, the service threatens push the local taxi company out of business.

Accordingly, future locations for the trials should be in consultation with the sector, with community transport providers eligible to provide the service.

Conclusion

NCOSS looks forward to working with TfNSW to ensure the Plan delivers its objective of ensuring the transport system responds to the needs of older people.

We would very much welcome the opportunity to discuss this submission with you in greater depth. Should you have any questions in relation to this matter, please do not hesitate to contact Deputy CEO, Anna Bacik (02) 8960 7916 or via email at: anna@ncoss.org.au

Yours sincerely

Joanna Quilty
Chief Executive Officer

¹¹ Future Actions for Transport for NSW, Better Infrastructure and Fleet, Plan p. 14.