



Response to the
Draft NSW Long Term Transport Master Plan
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NCOSS

The Council of Social Service of NSW (NCOSS) is the peak body for the social and community services sector in New South Wales. NCOSS works with its members on behalf of disadvantaged people and communities towards achieving social justice in NSW.

NCOSS provides an independent voice on welfare policy issues and social and economic reforms. It is the major coordinator for non-government social and community services in NSW.

1. INTRODUCTION

We welcome this opportunity to comment on the Draft NSW Long Term Transport Master Plan. We also commend Transport for NSW for recognising the important contribution transport can make to a fairer and more inclusive society. Our comments in response to this plan focus on strengthening the Government's ability to achieve its stated objective of reducing social disadvantage.

While we strongly support the development of targeted measures to address transport disadvantage, we also believe that consideration of fairness and equity should inform high-level and strategic decision-making processes. We have therefore also provided comments on strengthening the proposed actions in relation to delivering and funding the Long Term Transport Master Plan.

2. SUMMARY OF RECOMMENDATIONS

- The wording of Objective No. 6 should be amended to: "Support social inclusion – by improving access to goods and services, employment, education, *social and cultural* opportunities for *all* people across all parts of the State".
- The plan should include an additional objective for our transport system: To improve community safety, health and well-being.
- The Transport Master Plan should set out a clear vision for moving towards a low car-use society.
- The transport projects identified in the State Infrastructure Strategy should be subject to a similarly rigorous and transparent decision-making process as those identified through the Transport Master Plan. Furthermore, an extensive consultation process should be conducted before funds are committed.
- In addition to the modal strategies currently being developed as part of the master planning process, a Local Transport Modal Strategy should be developed.
- In developing modal strategies for cycling and walking, Transport for NSW should provide opportunities for community groups representing people experiencing disadvantage to provide input. Current actions should be supplemented by broader measures to ensure initiatives benefit people across all age groups, and across the socio-economic spectrum.
- The existence of transport disadvantage in relation to Aboriginal people should be explicitly acknowledged in the Transport Master Plan.
- A Local Transport Modal Strategy should support the development of innovative local services to address transport disadvantage including by:
 - Providing additional funding to 'pick-up' successful projects piloted through the Regional Transport Coordination program.
 - Facilitating the delivery of flexible or demand-responsive transport services at the local level.
- Processes should be established to ensure all members of the community are able to provide input into bus service planning processes.

- Strategies should be developed to address the access requirements of people whose needs sit outside the disability sphere.
- The importance of transport affordability should be acknowledged in the Transport Master Plan, with a commitment to developing a clear framework for concessions that will create stronger links between social policy objectives and measures aimed at providing affordable transport services.
- An advisory committee should be established to provide clarity, consistency and continuity around customer and community input into transport planning and decision-making processes.
- The NSW Government should include a clearly defined set of decision-making principles, based on those in the Victorian *Transport Integration Act 2010*, in the revised Passenger Transport Legislation.
- Transport for NSW should improve its ability to capture data that will contribute to an improved understanding of transport need, and the travel patterns of disadvantaged groups, including through existing mechanisms and through targeted processes.
- Benefit cost analysis methodologies should be improved to capture a broader range of costs and benefits associated with transport projects including environmental, health, and social impacts.
- Generic versions of all commercial service contracts should be made publically available via the Transport for NSW website.
- Transport for NSW should ensure there are opportunities for the community to provide input into the development of service guidelines, and performance indicators and standard across all modes.
- Reports against performance measures should be made publically available in easily accessible formats.
- In developing a distance-based tolling regime for the Sydney motorway network, equity should be a primary consideration.
- Transport for NSW should consider changes to motor vehicle registration that would promote and reward more environmentally responsible driving behaviour in addition to more environmentally friendly vehicles.
- A \$2.50 levy on private vehicle registration fees should be introduced and hypothecated into local and community transport.

3. SETTING THE DIRECTION

3.1. Objectives

The Draft Transport Master Plan identifies eight objectives for the NSW transport system. We support these objectives, and make the following suggestions:

1. **Reduce social disadvantage:** We commend Transport for NSW for acknowledging transport's role in creating a fairer and more inclusive society.

This objective could be framed more positively, in line with the other seven objectives.

More importantly, this objective should be broadened. The explanatory text currently focuses on the geographical component of transport disadvantage¹, and limits the scope of reducing this disadvantage to a narrow range of activities. We suggest that the wording of this objective is amended to:

“Support social inclusion – by improving access to goods and services, employment, education, *social and cultural* opportunities for *all* people across all parts of the State”.

The wording of Objective No. 6 should be amended to: “Support social inclusion – by improving access to goods and services, employment, education, *social and cultural* opportunities for *all* people across all parts of the State”.

2. **Improve community safety, health and well-being:** Transport can have a significant impact – either positive or negative – on the health of our communities. The objectives of this plan should acknowledge the link between transport and health, and seek to ensure that:

- a. Our transport system contributes to the health and well-being of all people in NSW; and that:
- b. Any negative health impacts do not disproportionately affect low-income or vulnerable populations².

We have made a similar suggestion in our submission to the Review of Passenger Transport Legislation³.

The plan should include an additional objective for our transport system: To improve community safety, health and well-being.

3.2. *The need for an over-arching vision*

In the preface to the objectives, the draft plan states:

“We have thought carefully about what sort of place we want NSW to be and how transport can contribute to our quality of life and standard of living.”

Yet although the plan identifies objectives for the transport system, it does not clearly describe what our transport system would look like in 20 years time if the objectives for the role transport should play were to be achieved. A clear vision for our transport system is needed to guide decision-making and prioritisation, particularly where achieving one objective may involve a trade-off against another.

We believe that the vision for our transport system should be for a low car-use society. Currently, the plan does not acknowledge the tensions involved in

¹ While transport disadvantage is concentrated in some locations, it can occur everywhere, including in locations currently well serviced by mainstream transport.

² This is in line with international moves towards greater recognition of the importance of environmental justice. For example, in the United States consideration of the distribution of health and environmental impacts was integrated into the Federal Transport agency’s mission following a 1994 Presidential Order.

³ See http://www.ncoss.org.au/resources/121023-NCOSS-submission_PassengerTransportReview.pdf

developing a transport system that relies on individual car ownership versus developing a system in which public transport takes on a more significant role. Failure to acknowledge and address these tensions means that our transport system will continue evolving in its current direction, with funds and resources allocated in response to existing trends. The Plan should position Transport for NSW to take a more active leadership role in setting out clear pathways towards a low car use society as an essential outcome of a fair and sustainable transport system.

The Transport Master Plan should set out a clear vision for moving towards a low car-use society.

While the draft Plan does contain some rhetoric about increasing the mode share of public transport, it is disappointing that the major infrastructure projects listed in the plan do little to instill confidence in a strategic shift in focus, with a higher proportion of funds directed into public transport.

Currently, it is not clear how the Government's priorities are being determined. While significant efforts were made to facilitate community input into the Transport Master Plan, funding priorities appear to be set by the State Infrastructure Strategy developed by Infrastructure NSW. No opportunities were provided for the public to provide input into this plan.

We understand that the NSW Government intends to respond in full to the Infrastructure Strategy by the end of 2012. In relation to the transport projects identified in this plan, we believe they should be subject to a similarly rigorous and transparent decision-making process as those identified through the Transport Master Plan. Furthermore, an extensive consultation process should be conducted before funds are committed.

The transport projects identified in the State Infrastructure Strategy should be subject to a similarly rigorous and transparent decision-making process as those identified through the Transport Master Plan. Furthermore, an extensive consultation process should be conducted before funds are committed.

3.3. A local transport system

The Transport Master Plan should encompass a clear strategy towards the delivery of transport services that are better able to meet a diversity of needs at the local level.

While we support the plan's strong focus on developing an integrated transport system, this focus currently appears to extend only so far as a strategic bus system.⁴ This means that the needs of people who are unable to access mainstream mass transit services will continue to be overlooked.

The plan should outline an intention to deliver integrated local transport services that connect with the strategic mass transit network and address the accessibility gap.

The plan does acknowledge a number of services that currently address certain local level transport needs. These include community transport (whose ability to address

⁴ This is highlighted on pg. 65 of the Draft Plan, which provides a diagram of public transport mode integration that omits a number of local transport services including community transport and taxis.

transport disadvantage more broadly is restricted by current legislative and funding arrangements), and taxis (the cost of which is often prohibitive). There is no strategy included in the Master Plan for either mode.

Furthermore, the Master Plan does not recognise the role of these modes in addressing transport disadvantage in metropolitan areas, while in relation to regional areas it states:

“Community transport services support regional and remote communities where regulated bus services are not available or do not meet local needs. Taxis also provide a critical service in regional areas particularly wheelchair accessible taxis.” (p. 211)

While the plan identifies a number of actions under each of these modes (pg 317), these have a narrow focus. In addition, modes other than taxis and community transport providing local level transport have not been acknowledged (such as the local bus services provided by some councils). There is a need to consider the interaction between the various modes providing local level transport, and to provide a clear and cohesive plan to enhance the ability of these (and other) modes to address transport disadvantage more broadly.

We therefore recommend that in addition to the integrated modal strategies currently being developed as part of the master planning process, a Local Transport Modal Strategy should be developed.

In addition to the modal strategies currently being developed as part of the master planning process, a Local Transport Modal Strategy should be developed.

3.4. Active Transport

We support the inclusion of separate cycling and walking modal strategies, and note that these modes also play an important role in addressing local transport needs.

There is a tendency, however, for the benefits of active transport initiatives to be unevenly distributed across socio-economic groups.

Many initiatives overlook the needs of particular groups in our community. As the cycling and walking strategies are developed, Transport for NSW should provide opportunities for community groups representing people experiencing disadvantage to provide input into the plans.

While we support the actions currently outlined in the Transport Master Plan we recommend that that should be supplemented by a broader range of actions to ensure that cycling and walking initiatives benefit people across all age groups, and across the socio-economic spectrum.

Additional actions may include:

- Prioritising pedestrian access around all major activity centres (not just public transport interchanges);
- Improving pedestrian priority at signaled intersections along all major urban centre pedestrian desire lines (not just in the CBD);
- Ensuring pedestrian crossings provide sufficient time for people with limited mobility to cross safely;

- Lowering speed limits in activity centres, including around schools, hospitals, and shopping and recreational facilities;
- Traffic calming measures in activity centres and residential areas;
- Introducing disincentives to drive, particularly in urban centres (while ensuring that access for people for whom there are no viable alternatives is not compromised);
- Ensuring adequate seating to support walking as a public transport mode for older and less mobile customers.

In developing modal strategies for cycling and walking, Transport for NSW should provide opportunities for community groups representing people experiencing disadvantage to provide input. Current actions should be supplemented by broader measures to ensure initiatives benefit people across all age groups, and across the socio-economic spectrum.

4. ADDRESSING TRANSPORT DISADVANTAGE

As noted above, we commend Transport for NSW for acknowledging the contribution transport can make to reducing social disadvantage.

In our submission to the Transport Master Plan Discussion Paper, we described both the groups most likely to be affected by transport disadvantage, and those geographic locations in which transport disadvantage is most likely to occur⁵. In addition to those groups listed in the Draft Transport Master Plan, there is evidence both that Aboriginal people (in all locations) are more likely to experience transport disadvantage, and that transport disadvantage is concentrated in Aboriginal communities, particularly those remote communities and those located on the sites of former missions with poor transport connections to towns and regional centres. The existence of this disadvantage should be explicitly acknowledged in the Transport Master Plan.

The existence of transport disadvantage in relation to Aboriginal people should be explicitly acknowledged in the Transport Master Plan.

In relation to transport disadvantage more broadly, the Plan focuses primarily on the geographic component of transport disadvantage. While we are pleased that this component has been acknowledged, we would also like to ensure that strategies are put in place to address transport disadvantage in all locations. Doing so will involve ensuring the system is available, accessible and affordable to all people. These three elements are discussed in more detail below.

4.1. Availability

The availability of transport services is clearly an important element of transport disadvantage, and transport disadvantage is concentrated in locations with low service levels and inaccessible public transport. We therefore strongly support measures such as increasing the frequency of services and extending the '30 minute

⁵ See http://www.ncoss.org.au/resources/120508_NCROSS_TransportMasterPlanSubmission.pdf

catchment' (p. 281) but believe these measures should be supplemented by others to address the issue of transport availability in all locations.

In small towns and remote communities where mass transit services are not viable, the Draft Plan states that 'innovative and better targeted solutions will be required'. There is no detail on how these solutions will be developed. We recommend that this be incorporated into the scope of a Local Transport Modal Strategy. We also recommend that additional funding be provided to 'pick-up' successful projects piloted through the Regional Transport Coordination program that provide innovative solutions. More information on this recommendation is available in the 2013-14 NCOSS Pre-Budget Submission.⁶

Innovative services will also be required to address the issue of availability of services across all locations – not just in rural and regional areas. Someone with limited mobility may not be able to walk 400m to a bus stop - particularly if this involves walking uphill or crossing a busy road. For such a person, it does not matter whether a nearby bus stop is serviced frequently, or only twice a day: no services are available that meet their needs. New types of services – such as flexible or demand-responsive services – will be required to ensure services are available to all people. Again, fostering the development of such services should fall within the scope of a Local Transport Strategy.

A Local Transport Modal Strategy should support the development of innovative local services to address transport disadvantage including by:

- Providing additional funding to 'pick-up' successful projects piloted through the Regional Transport Coordination program.
- Facilitating the delivery of flexible or demand-responsive transport services at the local level.

Furthermore, while on a map it may appear as if a transport service is available, it may not allow travel at suitable times of the day or to the locations people need to visit. For example, a commonly cited concern is that hospitals are often not on the bus route. Processes should be established to ensure all members of the community are able to provide input into bus service planning processes (see also Section 5.5 of this submission).

Processes should be established to ensure all members of the community are able to provide input into bus service planning processes.

4.2. Accessibility

We welcome the development of a new Disability Action Plan for transport in NSW. While this plan is mentioned in the Draft Transport Master Plan (p. 301) it does not appear to be integrated into the overall planning process and is missing from the

⁶ Available to download from <http://www.ncoss.org.au/resources/pbs/pbs2013-14.pdf>

diagram showing the relationship between high level and detailed planning processes on p.17 of the Draft Plan.

Updating the Disability Action Plan is also the only action listed under the statewide challenge '*Moving towards a more accessible transport system*' (p. 301). The text states that:

"We will focus our actions on particular groups of users such as the elderly, parents with prams, and customers with disabilities and reduced mobility.

However, our understanding of the Disability Action Plan is that its scope is limited to addressing the accessibility requirements of people with disability and people with limited mobility. As such, there does not appear to be any plans or strategies in place to address the access needs of other people who are currently excluded from the transport system. This includes older people, Aboriginal and Torres Strait Islander people, people experiencing mental health issues and people with low literacy and numeracy.

While the access issues addressed through the Disability Action Plan will likely benefit many of these groups, it is important that specific access requirements that sit outside the disability sphere are not over-looked. For example, there is a need to develop travel-training programs⁷ that address a wide range of needs - this includes older people (not all of whom experience limited mobility) who lack the confidence to use public transport, people who may have difficulty reading timetables, and people for whom cultural barriers to access exist.

Strategies should be developed to address the access requirements of people whose needs sit outside the disability sphere.

4.3. Affordability

As an essential social service, transport should be affordable for all people. Yet there is no clear process for considering transport affordability.

In relation to public transport, the current concession system lacks consistency and is inequitable: It unfairly disadvantages some groups of people including low-income earners, job seekers, and asylum seekers living in the community (Note that NCOSS will be publishing a more detailed report on transport concessions in late 2012).

The importance of affordability should be acknowledged in the Transport Master Plan. We further recommend that Transport for NSW commit to developing a clear framework for concessions that will create stronger links between social policy objectives and measures aimed at providing affordable transport services.

The importance of transport affordability should be acknowledged in the Transport Master Plan, with a commitment to developing a clear framework for concessions that will create stronger links between social policy objectives and measures aimed at providing affordable transport services.

⁷ Travel training can include individualised one-on-one travel training, group training that may involve a social outing using public transport, and information sessions on how to use public transport.

5. DELIVERING THE NSW LONG TERM MASTER PLAN

5.1. Consultation

The Draft Transport Master Plan states both that it includes changes to “governance processes to incorporate best practice” (p. 21) and that it is committed to “extensive community engagement and customer consultation” (p. 335).

While we commend this intention, no detail on proposed mechanisms to facilitate community consultation have been provided, and nor is consultation explicitly recognised as a component of best practice governance processes.

Four advisory groups were established to inform the development of the Draft Transport Master Plan. Yet as far as we are aware there is no intention to continue the advisory role of these groups beyond the end of 2012. Furthermore, there is no longer any consumer or community representation on the Transport Advisory Board. This means that beyond 2012 there is no mechanism in place to facilitate an ongoing dialogue with the community in relation to strategic decision-making processes.

We therefore recommend that an advisory committee be established to provide clarity, consistency and continuity around customer and community input into transport planning and decision-making processes. We note that this recommendation supports Goal 23 of NSW 2021: Involving the community in decision making on Government policy, services and projects.

An advisory committee should be established to provide clarity, consistency and continuity around customer and community input into transport planning and decision-making processes.

5.2. A framework for decisions

We are concerned that efforts to better understand the customer’s perspective are being confused with those required to ensure genuine community engagement and consultation.

Customer satisfaction surveys and the customer value proposition work being carried out by Transport for NSW will make a valuable contribution to evidence-based decision-making. Yet while the perspective of current and prospective users is important, it is also critical that the community is provided with ongoing opportunities to provide input into strategic decision-making processes, including informed discussions about high-level strategies and priorities. The importance of community consultation should be clearly articulated as a distinct process.

In our response to the Review of Passenger Transport Legislation⁸ we recommended that the NSW Government adopt a set of clear decision-making principles along the lines of those set out in the *Victorian Transport Integration Act 2010* (which clearly differentiates between the transport system user perspective and stakeholder engagement and community participation).

⁸ See http://www.ncoss.org.au/resources/121023-NCOSS-submission_PassengerTransportReview.pdf

The principles included in the Victorian Act are:

- Principle of integrated decision-making
- Principle of triple bottom line assessment
- Principle of equity
- Principle of the transport system user perspective
- Precautionary principle
- Principle of stakeholder engagement and community participation
- Principle of transparency

The NSW Government should include a clearly defined set of decision-making principles, based on those in the Victorian *Transport Integration Act 2010*, in the revised Passenger Transport Legislation.

5.3. Making evidence-based decisions

We strongly support efforts to improve the data used for decision-making. Currently, very little quantitative data is available on transport disadvantage and local level transport needs. We recommend that Transport for NSW improve its ability to capture data that will contribute to an improved understanding of transport need and the travel patterns of disadvantaged groups including through existing mechanisms (such as the NSW Health Population Health Survey) and through targeted processes.

Transport for NSW should improve its ability to capture data that will contribute to an improved understanding of transport need, and the travel patterns of disadvantaged groups, including through existing mechanisms and through targeted processes.

5.4. Improve assessment techniques and expertise

In relation to benefit cost analysis, we strongly recommend that current methodologies be improved to capture a broader range of costs and benefits associated with transport projects including environmental, health and social impacts.

Benefit cost analysis methodologies should be improved to capture a broader range of costs and benefits associated with transport projects including environmental, health, and social impacts.

5.5. Transparency

We strongly support enhanced transparency, and believe that this will improve the ability for the community to enter into an informed dialogue with Government.

We have previously expressed our concern about the lack of transparency in relation to the current Metropolitan Bus Contracting process. We are also concerned that moves towards a more commercial contracting environment across a number of modes will further reduce transparency. We therefore recommended that generic versions of all commercial contracts are made publically available via the Transport for NSW website.

Generic versions of all commercial service contracts should be made publically available via the Transport for NSW website.

Furthermore, Transport for NSW should ensure there are opportunities to provide input into the development of service guidelines and performance indicators and standard across all modes. Reports against performance measures should be made publically available in easily accessible formats.

Transport for NSW should ensure there are opportunities for the community to provide input into the development of service guidelines, and performance indicators and standard across all modes.

Reports against performance measures should be made publically available in easily accessible formats.

6. FUNDING

6.1. Doing more with what we have

The Master Plan identifies 'Doing more with what we have' as a critical area to address funding shortfalls, and includes in the description of this area "increasing the efficiency and effective utilisation of our existing transport infrastructure". There is a lack of clarity around the actions to support this goal, with actions addressed in other areas of the report (e.g. Managing Demand under Statewide challenges).

We recommend that the intention of actions in this area be clarified, and linked more strongly to pricing and revenue reforms. See below for further detail.

6.2. Reforming pricing and revenue

We support pricing reforms that will lead to a stronger relationship between the price paid by the consumer and the true financial, social and environmental costs of people's transport choices.

It is concerning that in the box text describing the funding gap for public transport and for roads and traffic (p. 322), only direct financial costs are taken into consideration. One-dimensional analyses such as this exacerbate common misconceptions about how much different transport user groups contribute to the cost of their transport.

[Distance-based charging](#)

We believe that distance-based charging on toll-ways could contribute to a fairer and more sustainable pricing system for transport, provided the following principles are applied:

- Charges should not unfairly disadvantage people unable to access alternative forms of transport. Relevant strategies may include rebates or concessions for people with disability and others for whom public transport is not a viable alternative; lower charges on routes where there are no public transport alternatives or creating High Occupancy/toll lanes (HOT) lanes.
- Charges should not make transport unaffordable. Relevant strategies may include discounts for concession card-holders and low-income earners.

- Charges should ensure more efficient use of the road network. The existing road network is only used at capacity a relatively small proportion of time. Pricing structures should focus on more efficient use of the existing network, rather than on maximising revenue. Relevant strategies may include time-variable charges, and pricing structures that encourage the efficient use of space and resources (e.g. carpooling).
- Revenue must be hypothecated into public transport. If revenue is reinvested in the motorway network rather than in public transport, road user charges will ultimately encourage car use and car dependency. Revenue should instead be used to make public transport a more attractive alternative. The experience of cities across the world suggests that this approach is key to securing public support for new road tolls.
- Revenue should be redistributed with consideration for equity. Locations currently lacking in public transport infrastructure should be prioritised for investment.

In developing a distance-based tolling regime for the Sydney motorway network, equity should be a primary consideration.

Reform of motor vehicle registration

We support reforming motor vehicle registration to improve safety and environmental outcomes. In addition to reforming motor vehicle registration to promote the growth of safer and more environmentally friendly vehicles, we encourage Transport for NSW to consider promote and reward more environmentally responsible driving behaviour. This might include strategies in Metropolitan areas well-served by public transport, such as reduced registration for low mileage usage. Such changes would need to take affordability issues into consideration to ensure people with no viable alternatives are not unfairly disadvantaged.

Transport for NSW should consider changes to motor vehicle registration that would promote and reward more environmentally responsible driving behaviour in addition to more environmentally friendly vehicles.

Identifying future funding opportunities

In our 2013-14 Pre-Budget Submission we recommended that a \$2.50 fee be levied on motor vehicle registrations to provide a dedicated income stream to support transport disadvantage⁹.

A \$2.50 levy on private vehicle registration fees should be introduced and hypothecated into local and community transport.

Capturing value from publically funded investments

We also support capturing a share of the rising land values generated from investment in public infrastructure, and distributing this revenue with consideration for equity. We note that public transport projects are more likely to result in increased land value than motorway projects.

⁹ See page 36 of the 2013-14 NCOSS Pre-Budget Submission: *Building Fairness First* for further information. Available from <http://www.ncoss.org.au/resources/pbs/pbs2013-14.pdf>