

NCOSS Response to the Vehicle Registration Initiatives Discussion Paper



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Council of Social Service of NSW (NCOSS)

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About NCOSS

The Council of Social Service of NSW (NCOSS) is a peak body for the not-for-profit community sector in New South Wales. NCOSS provides independent and informed policy advice, and plays a key coordination and leadership role for the sector. We work on behalf of disadvantaged people and communities towards achieving social justice in NSW.

Summary of Recommendations

- 1 Roads and Maritime Services should ensure the new continuous registration system is compatible with Centrepay, and should promote this as a payment option where appropriate.
- 2 Information linking a vehicle's number plates with an individual's concession entitlements should not be publically available: This information should be removed from the Roads & Maritime Services website as a matter of priority.
- 3 A proportion of the revenue raised from the registration system should go towards providing transport services for people who are unable to drive independently.

Introduction

The Council of Social Service of NSW (NCOSS) welcomes this opportunity to provide feedback in response to the NSW Government's *Vehicle Registration Initiatives Discussion Paper*.

We welcome many of the changes proposed in the paper. In particular, we welcome the changes that will contribute to a more sustainable – both socially and environmentally – transport system.

We would like to raise three issues in response to the Discussion Paper. The first two concern administrative arrangements relating to vehicle registration, and the third concerns the flow of revenue from vehicle registration fees.

1 Continuous Registration

Many low-income earners experience difficulty making the lump sum payments currently required in order to register a vehicle. The inability to register a vehicle can impact both individuals and families – it can compromise employment and educational opportunities, can inhibit access to services, and can also lead to fines and a cycle of debt.

NCOSS welcomes the proposal to introduce a continuous registration system. Such a system is likely to provide a valuable budgeting tool for many low-income households. However, for households struggling to make ends meet, direct debit arrangements can exacerbate financial problems. In implementing the continuous registration system, Roads and Maritime Services should therefore ensure the system is compatible with Centrepay, and should promote this as a payment option where appropriate. We note that the 2013 *Independent Review of Centrepay* found that motor vehicle registration was currently one of the least used categories of deductions - largely due to the limitations of the payment systems used by service providers.¹

Recommendation 1: *Roads and Maritime Services should ensure the new continuous registration system is compatible with Centrepay, and should promote this as a payment option where appropriate.*

2 Privacy for Concession Card Holders

We are concerned that information about concession entitlements is publically available through the online vehicle registration check. This service enables any interested person to enter a car's number plates and receive a free registration check report, including information about whether or not there are currently any concessions on the vehicle.

Individual concession card holders should be entitled to withhold this information, and we do not see any justification as to why it should be made publically available. While the *Vehicle Registration Initiatives Discussion Paper* does not explicitly address this issue, we believe the information should be removed from the website as a matter of priority.

¹ Buduls, Anne (2013) *Report of the Independent Review of Centrepay*. Available at <http://www.humanservices.gov.au/spw/corporate/government-initiatives/centrepay-review/resources/report-of-the-independent-review-of-centrepay.pdf>

Recommendation 2: Information linking a vehicle's number plates with an individual's concession entitlements should not be publically available: This information should be removed from the Roads & Maritime Services website as a matter of priority.

3 Revenue

The Discussion Paper states that under NSW legislation, all vehicle weight tax revenue goes to the Roads Program. The proposed reforms would reduce the vehicle weight component of the registration charge, introducing instead charges based on a vehicle's safety and environmental credentials. The Discussion Paper also states that as a result of these reforms, there will be no net reduction in all light vehicle revenues, including revenue allocated to the Roads Program.

NCOSS has previously proposed the introduction of a \$2.50 levy on private vehicle registration fees to be hypothecated into local and community transport.² While most people will experience a time in their life when they are no longer able to drive independently, few will enthusiastically relinquish their driver's licences. The well-justified fear of becoming socially isolated or losing one's independence is a major influence over older driver's reluctance to stop driving.³ If a proportion of revenue raised from the registration system were directed towards community transport and other local transport solutions, this would go some way towards alleviating concerns about a lack of transport alternatives, and would contribute to building a system that provides transport options for people at all stages of their lives.

Given that the majority of people recognise they will need assistance with transport at some point in the future – and know someone who is currently in this situation – we believe this measure would be well received.

Recommendation: A proportion of the revenue raised from the registration system should go towards providing transport services for people who are unable to drive independently.

Conclusion

Thank you for the opportunity to comment on the *Vehicle Registration Initiatives Discussion Paper*. Should you wish to discuss any of the issues raised in this submission in further detail please phone Rhiannon Cook, Senior Policy Officer, on (02) 9211 2599 ext 128 or email rhiannon@ncoss.org.au.

² NCOSS (2014) *Sharing the Benefits: Making NSW Fairer*. Available at <http://ncoss.org.au/resources/pbs/pbs2014-15.pdf>

³ See for example Australian Transport Safety Bureau (2004) *Older Road Users: From Driving Cessation to Safe Transportation*. Available at http://www.infrastructure.gov.au/roads/safety/publications/2004/pdf/Older_driv_2.pdf