

**Submission
No 67**

**ACCESS TO TRANSPORT FOR SENIORS AND
DISADVANTAGED PEOPLE IN RURAL AND
REGIONAL NSW**

Organisation: NSW Council of Social Service (NCOSS)
Name: Mr Douglas McCloskey
Position: Policy & Research Officer
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Access & Accessibility of Transport in Rural and Regional NSW:

NCOSS Submission to the Legislative
Assembly Committee on Community
Services Inquiry

21 July 2016

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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NCOSS can be found at:

3/52 William St, WOOLLOOMOOLOO NSW 2011

phone: (02) 9211 2599

email: info@ncoss.org.au

website: www.ncoss.org.au

facebook: on.fb.me/ncoss

twitter: [@_ncoss](https://twitter.com/_ncoss)

Summary of Recommendations

Recommendation 1

Expedite continued reform of the structure, funding and regulation of passenger transport. Specific attention should be paid to:

- Review of regulations and systems governing school transport to facilitate its use as transport for the general public,
- Increased funding in support of community transport to assist them in servicing unmet needs,
- Provisions facilitating greater flexibility in the expansion and operation of Community transport, including fee for service funds for community transport providers,
- Regulatory reform to allow flexibility of service routes and timetabling,
- Investigation of technology to facilitate more demand responsive services in smaller rural and remote communities,
- Regulatory flexibility and incentives for community transport to work with other local transport providers in provision of linking services and out of hours services,
- A review of volunteer insurance to ensure that there is an adequate safety net for the volunteer drivers upon which many community transport services rely.

Recommendation 2

Design a targeted programme to facilitate the better co-operative use of existing school and other embedded transport resources for the larger needs of local communities in rural and regional NSW. Specific attention should be paid to:

- Local route and service needs, including practical connections with local TAFE, training, health, youth services, sporting activities and community and justice services,
- Extending hours of operation beyond school days and school hours, to include out of hours, weekend and holiday services,
- Potential of incentives for cooperation with Community Transport providers, to allow their use of school and embedded service vehicles, for other community transport connections.

Recommendation 3

Review rural and regional service delivery within Transport for NSW, with greater focus and funding given to the regional coordination offices. Particular consideration should be given to;

- Filling senior regional officers positions, and increasing the funding available to their offices,
- Taking a more proactive approach to consulting and co-ordinating with local government, community transport, local business and community organisations at a regional level,
- Building on the Unmet needs project to undertake comprehensive regional level evaluations of the location of major community social and economic infrastructure, as a basis for service and route decisions. This should include TAFES, universities, community centres, courts, hospitals, medical centres, retail and commercial centres, sporting facilities, social housing, and government services centre locations,

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- Developing a framework for facilitating and brokering cooperation between local and community transport providers, to better utilise available transport resources,
- Developing simple resources to assist local and regional communities understand what support is available, and how best to assess and respond to transport needs in their community,
- Taking a proactive approach to community outreach, understanding and better, active connections with local communities in each region.

Recommendation 4

That Transport for NSW retain a strong role in the public and contracted initiation and provision of transport at a local and regional level in rural and regional NSW. Support for services that may not have a commercial basis is fundamental to ensuring transport access in much of rural and regional NSW.

Recommendation 5

As an extension, NCOSS reiterates the recommendation, contained in our 2015/16 Pre Budget submission¹, that an extra \$24.7 million be invested in the direct provision of 50 extra town-to-town bus and coach services in key regional centres across the state. These new services should be based upon 'commuter' formats linking smaller population centres with larger regional centres where employment opportunities, retail facilities, as well as training, health, and other community services are located.

Recommendation 6

Review current regional network 'brokerage' funding guidelines, to allow for 'pilot' periods longer than 12 months. Specific consideration should be given to the possible allowance of 18-36 month pilots, and the flexibility for recurrent funding arrangements where the community value of new services can be demonstrated.

Recommendation 7

Extend current public and contracted bus services, allowing for the provision of more services outside 9am-5pm, on weekends and in school holidays.

Recommendation 8

That staffing levels across rural and regional train stations and major bus and coach stops, be increased and guaranteed, to ensure adequate staffing throughout hours of service operation.

Recommendation 9

That IPART undertake an investigation into alternatives to the current application of distance based pricing on public and contracted services in rural and regional NSW. Such an investigation should recognise the significantly different nature of transport in rural and regional NSW, the greater distances involved, and the fact that such transport is often required to access everyday services and activities.

Recommendation 10

Expand RED ticket validity to include train and all public and contracted bus services in rural and regional NSW. Any exceptions should be minimal, and operate only to facilitate public access to high demand, limited supply services (such as a select number of long-distance train services)

¹ NCOSS – 'Pre-Budget Submission 2015-16', October 2015, pp 19-20.

<https://www.ncoss.org.au/sites/default/files/public/policy/PBS%20full%20report.pdf>

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[Recommendation 11](#)

Expand and adapt RED scheme to include a range of other groups of disadvantaged people, rationalising the way that concessional travel is treated in rural and regional NSW. Particular consideration should be given to TAFE students and apprentices, job-seekers, people who are unemployed and on income support, refugees and asylum-seekers.

[Recommendation 12](#)

Undertake an information campaign to increase awareness of IPTAAS across frontline medical professionals, to ensure that all Doctors Nurses and allied health professionals are aware of the scheme, can refer their patients to it, and have the information on hand to assist them with understanding and applying for it.

[Recommendation 13](#)

A review and upgrade of the IPTAAS website and other printed information regarding the scheme, focusing on simplification, accessibility and user-friendliness for older people, people with disability, aboriginal people and people with lower level English language skills. Particular attention should be paid to the eligibility criteria, explanatory material and the application process.

[Recommendation 14](#)

Extend the eligible costs covered by IPTAAS to cover payments to Community Transport providers.

[Recommendation 15](#)

Review the IPTAAS scheme to explore options for making payments through the system upfront, rather than as a subsidised rebate.

[Recommendation 16](#)

Extend of the IPTAAS scheme to cover access to transport to mental health and drug and alcohol treatment services.

[Recommendation 17](#)

Transport for NSW should formulate, and make publicly available the long term schedule for the comprehensive upgrade of all its train stations, coach and bus stop infrastructure across the state. This transparency would support long term planning by local governments and communities regarding their own connecting infrastructure, and assist older people and people with disability to make longer term life decisions about accommodation, employment and treatment.

[Recommendation 18](#)

Transport for NSW to publish (electronically and in hard copy) and actively publicise, a comprehensive map of transport across NSW that clearly indicates accessible facilities, and inaccessible facilities. This could be done in conjunction with the previous recommendation, also listing when those facilities that are currently not accessible, will be upgraded.

[Recommendation 19](#)

Review all regional bus stops to ensure that their positioning is accessible, safe and practical for all potential users, with particular consideration for the elderly, youth and families and people with disability. Particular attention should be paid to lighting, footpaths, and safe and accessible road crossings.

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Recommendation 20

Commit to ensuring that staffing at stations and major bus and coach stops is adequate and consistent. Staff should have the training and resources to offer the information, service and support that older people, people with disability, children and families rely upon.

Recommendation 21

Review the policy on limits (formal or otherwise) to the number of wheelchairs and mobility aids able to be accommodated in each carriage of regional train services. In the event that there are fixed physical limits, consideration should be made to upgrading or retrofitting carriages used on rural and regional services. Longer term purchases of regional rolling stock should consider any current practical limitations, with purchase decisions accommodating larger allowances for mobility aids, or stock being flexible enough to accommodate more where required.

Recommendation 22

Guarantee an adequate minimum level of trained staff at all regional and rural train and major coach stops, with recognition of their role in guaranteeing accessibility of transport services.

Recommendation 23

Assess the planning and operation of train replacement services, with implementation of a clear policy governing the way all arrangements are planned and undertaken. Particular attentions should be paid to;

- The accessibility of infrastructure at connections,
- The adequacy and accessibility of information, security and toilet facilities available,
- The accessibility of the replacement vehicles used,
- The planning of stops for replacement vehicles, and ensuring they are accessible, with all necessary equipment (such as wheelchair lifts and ramps) fully functional,
- That there are adequate staff at connection points on replacement services,
- That staff are trained and capable of dealing appropriately with passengers with disability, or those who are older or less mobile,
- That information regarding the replacement services is provided in advance, is accurate and comprehensive.

Recommendation 24

Review of the way information regarding the accessibility of replacement services is provided. Particular attention should be paid to ensuring information is provided in advance, is accurate, and is comprehensive regarding any potential accessibility issues with services, connections, staffing, boarding and alighting.

Recommendation 25

Harmonise passenger transport regulations and other policies governing local, school and community transport to ensure that there is a standard requirement for accessibility in vehicles used for all transport services. Any accelerated imposition of minimum accessibility standards must be accompanied by a significant expansion in funding and concessional loans to transport operators in rural and regional areas, to facilitate the purchase and conversion of appropriate vehicles.

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Recommendation 26

Review of the WAT scheme to recognise the particular circumstances in rural and regional NSW, and the need for additional incentive measures supporting the adequate provision of accessible taxi services in those areas. Consideration should be given to;

- Potentially requiring rural and regional taxi operators to have a minimum number of WATs available,
- Additional or preferred access to concessional loans for the purchase or conversion of WAT vehicles,
- Higher subsidy payments being available to the drivers of WAT taxis in rural and regional areas,
- A per journey payment cap in rural and regional areas higher than the current \$60 standard payment.

Recommendation 27

Invest \$2.5 million to provide funding for a 5-year expansion of the 'Driving Change' programme, in 6 sites across Western NSW, the Far West and Murrumbidgee districts

Regional transport Access and Accessibility

Introduction

NCOSS welcomes the opportunity to make a submission to this inquiry. We commend the Committee for recognising that access to transport in regional and rural NSW is a critical determinant of the full social and economic participation of rural and regional residents, and vital for the health and sustainability of those communities.

The terms of reference for this inquiry specifically make mention of the access to transport for older people and disadvantaged people in rural and regional areas. While we welcome this recognition of the particular difficulties faced by older people and disadvantaged (including people with disability and Aboriginal people), NCOSS contends that all those who live in rural and regional NSW are relatively disadvantaged as a result of their limited access to transport options, and the barrier this presents to their full social and economic participation in the community. In this context, our submission will seek to make reference both to the general issues of transport disadvantage experienced by residents of rural and regional NSW, as well as the specific issues relating to older people and other disadvantaged residents, who are particularly vulnerable, and for whom the issues raised have particular importance.

Method

NCOSS conducts a yearly round of over 25 regional consultations across the state, gathering the key issues facing our members and local community organisations, as part of our Pre-Budget Submission (PBS) process. In formulating this submission, NCOSS has drawn upon input from the 2015 and 2016 consultations, along with specific additional input from a number of key member organisations who participate on the NCOSS Transport Policy Advisory Group (TPAG), including Community Transport Organisation (CTO), The Physical Disability Council of NSW (PDCN), People with Disability Australia (PWDA), Combined Pensioners and Superannuants Association (CPSA) and the Northern Rivers Social Development Council (NRSDC). The contribution of these TPAG members is in addition to individual submissions that they will make independently. In the interests of clarity, we will respond under the broad categories of the terms of reference for the inquiry.

(a) Specific issues relating to the transport needs of seniors and disadvantaged people in rural and regional NSW

General transport disadvantage in rural and regional NSW

In looking at the specific transport needs of older and disadvantaged people in rural and regional NSW, it is important to recognise the general level of transport disadvantage that exists in most of rural and regional NSW. Reliance upon private vehicle transport is significantly higher in rural and regional NSW (as high as 90 percent in some areas), with public and other transport options often very limited or non-existent. Older people, and a

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range of other potentially disadvantaged groups such as Aboriginal people, young people, people who are unemployed, people with disability and people receiving income support, often have limited or no access to a private vehicle and so are heavily reliant upon public transport.

Good transport is not an end in itself, but a crucial linkage that enables full social and economic participation, through facilitating access to education, training, employment, health services, shopping, social services, entertainment, recreation, family and friends. A lack of adequate access to transport (transport disadvantage) is an important form of disadvantage that can exacerbate or even cause unemployment, ill-health, mental illness, poverty and social isolation. Transport disadvantage is not merely a case of limited availability of transport options, but also a case of the available options being unaffordable, ineffective, inaccessible or exclusionary in such a way as to leave people without functional and reliable access to work, education, health and other services that enable full social and economic participation in the community.² Specifically, our consultations across NSW have highlighted a range of ways in which lack of reliable, practical and affordable access to transport impacts detrimentally upon people's health, opportunities and the general quality of their lives, including, but not limited to;

- A lack of transport options leading to people in rural and regional areas having less access to schooling, education and training that leaves them less able to build the skills and experience they need for secure employment, potentially locking them in to unemployment and longer term disadvantage³,
- A lack of reliable, accessible and affordable transport leading to people in rural and regional areas unable to access doctors, hospitals and other medical services they need. With the result in the worst cases being higher levels of mortality (eg. for people with cancer, diabetes and kidney disease) and lower life expectancies⁴,
- A lack of access to transport that curtails or makes impossible, the employment necessary to survive, be independent, contribute to their community and build a better quality of life. This common problem often leaves many people in rural and regional areas reliant upon income support, and exacerbates ongoing generational disadvantage⁵,
- A lack of practical transport curtailing access to shopping, sporting activities, community services, friends and families, that leaves people more isolated, excluded and more prone to poor mental health, and drug and alcohol problems,
- A lack of access to transport leaving people incarcerated as a result of inability to attend court hearings, parole meetings or other legal appointments.

Consultations across regional NSW that NCOSS have undertaken raised a number of issues related to the general transport needs of those in rural and regional NSW, issues which are experienced across the wider rural and regional community, but are most acutely felt by older and disadvantaged people. Accordingly, in addressing access to transport for these disadvantaged people, NCOSS would like to raise a number of issues related to general regional and rural transport disadvantage.

² CAFCA. Resource Sheet: the relationship between transport and disadvantage in Australia. August 2011, pp1-8
<https://aifs.gov.au/cfca/sites/default/files/publication-documents/rs4.pdf>

³ ACOSS/ National Rural Health Alliance – A snapshot of poverty in rural and regional Australia. Oct 2013. pp 6-13
http://ruralhealth.org.au/documents/publicseminars/2013_Sep/Joint-report.pdf

⁴ National Rural Health Alliance. Fact Sheet 8: Cancer in Rural Australia. Jan 2012, p1
<http://ruralhealth.org.au/sites/default/files/publications/fact-sheet-08-cancer-rural-australia.pdf>

⁵ ACOSS/ National Rural Health Alliance – A snapshot of poverty in rural and regional Australia. Oct 2013. pp 6-13
http://ruralhealth.org.au/documents/publicseminars/2013_Sep/Joint-report.pdf

1. Issues with unavailability or infrequency of public transport options

Whether it is connections between major regional centres, connections from regional centres to Sydney, small towns to regional centres, or local areas to small towns, there are often very limited transport options available, with those that exist often being impractical and unaffordable for those that need them.

Local Transport Issues

- In many cases there are limited local transport options, either because they do not exist or because they are not frequent enough, or run only during times that make them impractical for accessing employment, shopping, community services, treatment and training. Particularly in smaller and more remote communities, this leaves those without access to a private vehicle (particularly young people, older people and people with disability) without access to their local community, local services and the basics of everyday life (such as shopping, entertainment and community services).
- In many local rural and regional communities, community transport is the only service that operates. However, in most cases these services are over-subscribed, extremely restricted, running only by pre-booking, and often only available to limited, very particular sections of the community. There is strong local support for community transport across the state, but community transport operators need more support, and more flexibility to adapt better to the genuine needs of their communities, and work with others to fill the gaps where they may be the only option.
- In many local areas, school buses are the only regular, ongoing local transport services that exist. These services are neither designed for nor intended for the general public, have fixed routes and stops, and only operate around school hours, during the week on school terms. The result is that older and other disadvantaged people for whom these services can be the only option, are using them inappropriately and are restricted to travelling with school children, and limited to school hours in term.
- Throughout the state, there was consistent feedback that a significant issue in access to local transport in rural and regional areas, was the inefficient and fragmented use of the resources that exist. There are often a range of embedded transport services (such as local clubs, sporting organisations, churches, schools, and community organisations) with vehicles that lay idle for long periods, when there is an established transport need going unserved.
- Current systems of providing brokerage funding to new transport services, without the prospect of a long-term sustainable solution, are not given sufficient opportunity and support to establish themselves, with criteria for success often being overly reliant upon a commercial case that cannot be met in many smaller rural communities. This contributes to maintaining a status quo of poor access to services in these regions. Small non-recurrent projects cannot overcome the challenges that thin public transport markets pose and those who are disadvantaged are paying the price. Government has a role to play where the market cannot respond to need. Specific attention is needed in facilitating and 'brokering' projects that respond to unmet need for instance, transport for young people and regular accessible transport that will not only link people with services but also education and employment opportunities.
- In many cases local Community Transport service providers rely heavily, or totally, on volunteer drivers in the provision of their services. There is concern among many community transport providers that existing

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insurance arrangements for volunteers do not provide sufficient coverage for them to continue to operate safely and confidently. NCOSS received feedback during its consultations that concerns over coverage of volunteers is discouraging drivers, and is an ongoing impediment to the maintenance and expansion of vital community transport services.

- Local services that do exist in many rural and regional areas of NSW, are operated according to passenger transport regulations, and strictly adhere to set stops and routes. In many smaller communities, this restriction limits service flexibility and leaves a large number of older people, people with disability, people who are unemployed, people who receive income support, and young people isolated from the transport they need. NCOSS consultations suggested that greater flexibility in adapting routes and times, and responding more flexibly to demand circumstances would allow services to connect with those who are isolated and without access. While there are a number of regulatory, financial and technological issues to overcome in the provision of more demand responsive transport services, there is a real need to expedite the process of review and reform of regulation to give greater flexibility and scope for innovative approaches that meet local community needs.

Recommendation 1

Expedite continued reform of the structure, funding and regulation of passenger transport. Specific attention should be paid to:

- Review of regulations and systems governing school transport to facilitate its use as transport for the general public,
- Increased funding in support of community transport to assist them in servicing unmet needs,
- Regulatory reform to allow flexibility of service routes and timetabling,
- Investigation of technology to facilitate more demand responsive services in smaller rural and remote communities,
- Provisions facilitating greater flexibility in the expansion and operation of Community transport, including fee for service funds for community transport providers,
- Regulatory flexibility and incentives for community transport to work with other local transport providers in provision of linking services and out of hours services,
- A review of volunteer insurance to ensure that there is an adequate safety net for the volunteer drivers upon which many community transport services rely.

Recommendation 2

Explore and design a targeted programme to facilitate the better co-operative use of existing school and other embedded transport resources for the larger needs of local communities in rural and regional NSW. Specific attention should be paid to:

- Local route and service needs, including practical connections with local TAFE, training, health, youth services, sporting activities and community and justice services,
- Extending hours of operation beyond school days and school hours, to include out of hours, weekend and holiday services,
- Potential of incentives for cooperation with Community Transport providers, to allow their use of school and embedded service vehicles, for other community transport connections.

Regional and inter-regional transport Issues

Over a sustained period, many smaller rural and regional towns have seen their health, education, postal, banking, training and justice services rationalised and relocated to larger regional centres. Increasingly, people living outside of larger regional centres have to travel long distances for employment, training, education, health services, community services, and to attend court. Particularly for those without a private vehicle, access to affordable and practical transport is fundamental. In particular our consultations highlighted;

- There is a lack of reliable, practical and coordinated 'commuter' connections between smaller towns and their major regional centres where essential services and employment opportunities are located. Services that do operate are infrequent, indirect and often run at times that make them impractical for everyday use, or impossible to access and connect with (for example, services leaving before the arrival of the only connecting services, services running 9-5 only, services not running on weekends),
- In many cases major inter-regional journeys have limited or no rail connections, with services that do exist often being pre-booked services only, running only once a day, or having limited stops or being run or requiring connections via coach that make them impractical. In the cases where coaches replace previous train services, there are issues with reliability, capacity and facilities,
- Air-travel is often the only option for longer distance inter-regional travel, often with only a single carrier offering services which are expensive and offer little timing choice that requires overnight stays for return trips. Feedback also suggests that the maximums that some regional providers place on wheelchairs and mobility aids, is an additional barrier to access for older people and people with disability.

Issues in linkage and regional co-ordination of services

NCOSS would like to reiterate the issues with a lack of effective co-ordination and utilisation of resources, in many rural and regional areas. Our consultations have highlighted a number of issues with the way that existing services in rural and regional NSW operate, that seriously impede their effectiveness, including:

- A lack of local and regional level co-ordination of service timetables, that render them impractical or unfit for those who rely upon them. NCOSS was told of many examples where key regional services depart prior to the arrival of the linking local services, or examples where regional services are scheduled too late to be utilised by 'commuters' or others getting to and from important appointments in the space of a day,
- A lack of route and timetable co-ordination with the scheduling of major community services and requirements, such as court sessions, TAFE training, medical centre hours, and sporting and community events. Currently, it is often the case that the limited services which exist scheduled on days or at times of the day, that don't match most of the key community requirements (with examples of people missing court appointments as a result),

- The key senior regional officer positions in many of the Transport for NSW regional offices, have either not been filled, or have no accessible contact information⁶. The existence of these officers is an important recognition of the key role of Transport for NSW in informing and facilitating the planning, coordination and implementation of effective transport services according to the requirements of communities across the different regions. However, having positions unfilled, insufficiently funded, or with a passive approach to their role, means that the coordination of regional services remains very patchy and dysfunctional in many areas of the state.

Recommendation 3

Review rural and regional service delivery within Transport for NSW, with greater focus and funding given to the regional coordination offices. Particular consideration should be given to;

- Filling senior regional officers positions, and increasing the funding available to their offices to facilitate,
- Taking a more proactive approach to consulting and co-ordinating with local government, community transport, local business and community organisations at a regional level,
- Building on the Unmet needs project to undertake comprehensive regional level evaluations of the location of major community social and economic infrastructure, as a basis for service and route decisions. This should include TAFES, universities, community centres, courts, hospitals, medical centres, retail and commercial centres, sporting facilities, social housing, and government services centre locations,
- Developing a framework for facilitating and brokering more flexible cooperation between local and community transport providers, to better utilise available transport resources,
- Developing simple resources to assist local and regional communities understand what support is available, and how best to assess and respond to transport needs in their community,
- Taking a proactive approach to community outreach, understanding and better, active connections with local communities in each region.

Recommendation 4

That Transport for NSW retain a strong role in the public and contracted provision of transport at a local and regional level in rural and regional NSW. Support for services that may not have a commercial basis is fundamental to ensuring transport access in much of rural and regional NSW.

Recommendation 5

NCOSS reiterates the recommendation, contained in our 2015/16 Pre Budget submission⁷, that an extra \$24.7 million be invested in the direct provision of 50 extra town-to-town bus and coach services in key regional centres across the state. These new services should be based upon 'commuter' formats linking smaller population centres with larger regional centres where employment opportunities, retail facilities, as well as training, health, and other community services are located.

⁶ <http://www.transport.nsw.gov.au/customers/community-transport/senior-regional-officers>

⁷ NCOSS – 'Pre-Budget Submission 2015-16', October 2015, pp 19-20.

<https://www.ncoss.org.au/sites/default/files/public/policy/PBS%20full%20report.pdf>

Recommendation 6

Review current regional network funding 'brokerage' guidelines, to allow for 'pilot' periods longer than 12 months. Specific consideration should be given to allowance of 18-36 month pilots, and the flexibility for recurrent funding arrangements where the community value of new services can be demonstrated.

Recommendation 7

Extend current public and contracted bus services, allowing for the provision of more services outside 9am-5pm, on weekends and in school holidays.

2. Issues with staffing, safety and security of services

- In many cases, train services that do exist run with lower numbers of staff on trains, and often with staff not being visible or easily accessible to passengers, particularly on long gaps between stations. NCOSS consultations received a lot of anecdotal feedback that without adequate, visible staff, incidents on regional train services have increased, with the result that many people in rural and regional areas do not regard services as safe for normal practical use, and are discouraged from using them. This issue was highlighted as a particular issue for older people, single women, young people and people with disability, and cited as a factor compounding their difficulties accessing transport.
- Many regional and rural train stations, and major coach stops are often un-staffed or not staffed consistently, with the nature of services meaning many people in rural and regional areas are left waiting for long periods without access to staff. This has been raised as an issue for security, particularly in conjunction with reduced staffing on the services themselves. Beyond security, this issue was raised as a serious practical barrier to access to transport, often leaving people waiting for transport without access to service assistance, toilets, and updates regarding service changes.

Further, our regional consultations suggest that train stations and major coach stops are regarded as vital service and community connection points in rural and regional areas, and are an important means for people to connect to information about their community, as well as access transport services. The loss of staff at these points not only impedes access to transport, but also removes another important community connection. NCOSS believes that ensuring there are staff at all stations and major coach stops is not only a means of ensuring good, safe access to transport, but also provides important employment opportunities in struggling regional areas, and helps facilitate the exploration of a range of other linkages and service provision (such as connections with community transport, school transport, youth services, treatment transport, and more) to address many of the service gaps and disadvantages that currently exist.

Recommendation 10

Increase staffing levels across rural and regional train stations and major bus and coach stops, and guarantee adequate staffing throughout hours of service operation.

3. Issues with the practical affordability of services

A fundamental determinant of access to transport, is its affordability. For people who live in rural and regional NSW consultations have highlighted a range of issues related to the affordability of, which make the services that do exist impractical and effectively inaccessible, including;

- Even for everyday transport requirements in rural and regional areas, it is often necessary to travel long distances on a daily basis (50-100km or much more is not unusual). Largely based on the prevailing circumstances in Sydney and other metropolitan areas, most fares are currently based upon distance travelled. In rural and regional areas, this often means that basic, regular daily trips (when transport is available) is expensive, and represents a cost burden than often impacts upon peoples decisions and their practical access to transport.
- While there are concessional arrangements for pensioners under the Regional Excursion Daily (RED) ticket scheme for NSW pensioners and seniors card-holders, which allow a whole days travel on 'contract B bus services' for \$2.50, they do not cover services that many people rely on, namely;
 - Regional train services that allow access to regional centres of services and employment,
 - Connecting coach services, that have replaced former train services on branch lines and connect smaller towns with larger centres,
 - Community transport services, that may be the only services available.
- There is no scheme, similar to RED ticket, for people who are unemployed, job-seekers, apprentices, or people on income or some disability supports. The current system of concessions is inconsistent, difficult to understand and access, and does not provide adequate assistance to facilitate transport access. For these people access to transport is vital in getting the training, job support, services and employment that can help them overcome disadvantage, isolation, poverty and dependence. Without more consistent, and significant concessions, the large distances and resulting high costs of transport, practically exclude these people and contribute to the entrenchment of disadvantage.

Recommendation

IPART undertake an investigation into alternatives to the current application of distance based pricing on public and contracted services in rural and regional NSW. Such an investigation should recognise the significantly different nature of transport in rural and regional NSW, the greater distances involved, and the fact that such transport is often required to access fundamental everyday services and activities.

Recommendation

Expand the RED ticket validity to include train and all public and contracted bus services in rural and regional NSW. Any exceptions should be minimal, and operate only to facilitate public access to high demand, limited supply services (such as a select number of long-distance train services)

Recommendation

Expand the RED scheme to include a range of other groups of disadvantaged people, rationalising the way that concessional travel is treated in rural and regional NSW. Particular consideration should be given to TAFE students and apprentices, job-seekers, people who are unemployed, people who are on income support payments, and refugees and asylum-seekers.

Issues with IPTAAS

The Isolated Patient Transport and Accommodation Assistance Scheme (IPTAAS) exists in recognition that people in rural and regional NSW have difficulty in accessing health services and treatment that they are often required to travel long distances to access. The scheme offers rebate subsidies to cover a range of costs of travel and accommodation associated with getting to treatment. NCOSS welcomed the changes to the scheme last year, which improved coverage and access to the scheme and recognised the role it can play in assisting access to vital health services for people in rural and regional NSW. However, our consultations raised a range of issues with the way that the scheme operates, which mean that many people are still missing out on vital treatment as a result, including:

- Awareness of the scheme among doctors, nurses and other frontline professionals in rural and regional areas is patchy, meaning that many people who need and would benefit from it, are unaware of the potential for assistance. This lack of awareness is leaving many to bare the burden of substantial travel costs to get to treatment themselves, find unsafe means of travelling to treatment (such as hitchhiking), or worse, forgo treatment altogether because they cannot afford to get to it.
- The information on the scheme, including the associated website, is not user-friendly. The site is very difficult to navigate, access, and apply for. Feedback from local community organisations suggests that people aren't using the system because they aren't confident in understanding how it works, whether they are eligible, and what they have to do to complete an application. Without good public knowledge among health professionals, this leaves the system functionally inaccessible for many people that need it.
- The IPTAAS subsidy operates as a rebate that is returned to eligible users, assisting with the coverage of costs that they must pay upfront. There are often very significant upfront costs involved (both in transport, and the associated accommodation often required to facilitate treatment, and a return trip with limited transport options). In many cases older people, people with disability, aboriginal people, unemployed people and people on income support, simply do not have the ability to cover these amounts upfront.
- The IPTAAS scheme is very limited in its coverage. While it recognises the difficult reality that large distances impose upon people in rural and regional NSW, it does so only in relation to a narrow band of medical treatment. The same issues with large distances, difficulty in accessing services, and the costs involved, are at play in important mental health services and drug and alcohol treatment services. In all of these cases people in rural and regional NSW often have to travel long distances, at great expense, for access. Our consultations have highlighted the fact that people in rural and regional NSW are missing out on these vital services as a result of this distance and cost. The result of this curtailed access is worsening issues of mental illness and drug and alcohol addiction particularly among youth and young people.

- The IPTAAS scheme is currently limited to rebate payments covering private vehicle and public transport costs. In Many instances the only available option for people in rural and regional NSW, is travel via Community Transport. While Community Transport providers work hard to accommodate such needs, they are substantially oversubscribed, often do not get any funding to assist in covering their costs for such trips. This circumstance puts discourages Community Transport providers from assisting with such trips, and puts a significant added burden on them if they do. Extending the IPTAAS scheme to allow for coverage of costs of community transport, would assist in easing this pressure and facilitate more community transport provision of treatment related travel.

Recommendation 14

Undertake an information campaign to increase awareness of IPTAAS across frontline medical professionals, to ensure that all Doctors Nurses and allied health professionals are aware of the scheme, can refer their patients to it, and have the information on hand to assist them with understanding and applying for it.

Recommendation 15

Review and upgrade the IPTAAS website and other printed information regarding the scheme, focusing on simplification, accessibility and user-friendliness for older people, people with disability, aboriginal people and people with lower level English language skills. Particular attention should be paid to the eligibility criteria, explanatory material and the application process.

Recommendation 16

Extend the eligible costs covered by IPTAAS to cover payments to Community Transport providers.

Recommendation 17

Review the IPTAAS scheme to explore options for making payments through the system upfront, rather than as a subsidised rebate.

Recommendation 18

Extend the IPTAAS scheme to cover access to transport to mental health and drug and alcohol treatment services.

(b) Accessibility of current public transport services in rural and regional NSW

In our recent consultations with members and local community groups across the state, and in consultation with a number of key NCOSS members representing older people and people with disability, a range of issues with the accessibility of current public transport services in rural regional NSW were highlighted, suggesting that there are still significant weak links that often serve to leave public transport practically inaccessible for many.

4. Accessibility of stations, bus stops and other transport infrastructure

While there is a long-term project to ensure that all public transport infrastructure meets good minimum standards of universal accessibility, there is still nearly 50% or more of infrastructure across the state that does not meet standards that allow practical, independent accessibility. Specifically;

- Many regional and rural train stations are still yet to receive accessibility upgrades, with no clear and concrete long term schedule as to when all stations will be upgraded. This leaves large gaps in the system, with no transparency as to when infrastructure will be upgraded. This is a crucial, practical issue for the elderly and people with disability, who cannot reliably access the transport they need with safety and confidence, and are discouraged from utilising transport as a result. This is also an issue for local governments, who do not have a long term schedule as a basis from which to plan their own upgrades of important surrounding infrastructure, that is crucial for the practical accessibility of transport services.
- While it is possible to find out if a particular station is accessible, there is no user-friendly, easily readable map of the whole system that allows people to map entire journeys, possible options, and be confident that all potential connection points are accessible to them
- Connecting infrastructure, including ramps, footpaths, toilets and carparks around stations, coach and bus stops is often not accessible. With services requiring connections using these points (particularly when trains are replaced by coaches) this can leave the elderly and people with a disability unable to get to their destination and unable to make their connections. With limited resources, and no long term schedule of accessibility upgrades for stations and stops, local governments struggle to put in place plans for upgrading this important connecting infrastructure.
- The positioning of many regional bus-stops is often done in such a way as to make them potentially unsafe and practically insecure. Bus stops next to highways, without accessible crossings, un-lit, and without accessible footpaths, are not uncommon and leave many older and disadvantaged people (such as people with disability, single parents with children and young people) unable to safely and reliably access the transport they need.

Recommendation 19

Transport for NSW should formulate, and make publicly available the long term schedule for the comprehensive upgrade of all its train stations, coach and bus stop infrastructure across the state. This transparency would support long term planning by local governments and communities regarding their own connecting infrastructure, and assist older people and people with disability to make longer term life decisions about accommodation, employment and treatment.

Recommendation 20

Transport for NSW to publish (electronically and in hard copy) and actively publicise, a comprehensive map of transport across NSW that clearly indicates accessible facilities, and inaccessible facilities. This could be done in conjunction with the previous recommendation, also listing when those facilities that are currently not accessible, will be upgraded.

Recommendation 21

Review all regional bus stops to ensure that their positioning is accessible, safe and practical for all potential users, with particular consideration for older people, young people and families, and people with disability. Particular attention should be paid to lighting, footpaths, and safe and accessible road crossings.

Recommendation 22

Commit to ensuring that staffing at stations and major bus and coach stops is adequate and consistent across all hours of operation. Staff should have the training and resources to offer the information, service and support that older people, people with disability, children and families rely upon to safely access transport.

5. Accessibility of Buses, Coaches and Trains.

While there has been a long term focus on improving the accessibility of buses, coaches and trains across the state, our consultations raised a number of important issues that are still unfairly disadvantaging many in rural and regional communities.

- Train carriages are increasingly accessible. Travel by train represents the preferred option for older people, people with disability and families, as a result of accessibility, space, comfort and availability of toilet facilities. However, there are many cases in which trains are still practically inaccessible to older people and people with disability.
 - Current practice places a limit of 1 wheelchair per carriage on many country services, which in combination with the small number of carriages, means that these services can carry only 2 people in wheelchairs or mobility aids. Across the state NCOSS was told of many instances of people with disability not being able to board services because the train already had 2 wheelchairs aboard, leaving them unable to make connections or get to their destination. Such experiences, or even the possibility of such experiences discourage use of public transport.
 - Many older people, single parents, carers and people with disability currently must rely on station and train staff for information and for assistance and support in boarding and alighting from services. The reduction or elimination of staff on trains and on stations, leaves many services practically inaccessible to these people, and discourages use of services for fear of being left unable to get on or off services as required. NCOSS heard of many cases of transport staff being unavailable, or unwilling or unable to assist a person with a disability with a ramp or other support to enable their access. Such instances represent practices that do not meet the standards set out in Transport for NSW's own Disability Action Plan.
- Train replacement coach and bus services and their connections are often not accessible. NCOSS consultations highlighted many issues with the way that train replacement services are planned, publicised and operated, leaving them practically inaccessible. Including;
 - Instances where part of a train journey may be replaced by coach services, with connections and transfers being required at inaccessible stations (with stairs, no ramps, no accessible toilets, inadequate or untrained staff).

Access & Accessibility of Transport in Rural & Regional NSW

- Replacement coaches either not being fully accessible or being practically inaccessible as a function of having limited space, no or inaccessible toilet facilities, non-functioning equipment for disabled or mobility access, or having their stopping points being impractical, unsafe or inaccessible. These are issues relevant not just to people with disability, but to less mobile older people, and parents with prams.
- Inadequate or inaccurate information regarding accessibility of replacement services that leave people with disability, older people and less mobile people stranded at connection points, embarrassed and unable to rely on the transport services they need.
- Staff at stations, coach and bus stops, and connection points being unavailable, or unwilling or unable to support and assist people with disability to access the train or coach, again representing a failure to meet standards in the Disability Action Plan.
- While there is an ongoing programme to ensure that the buses and coaches run by Transport for NSW and private service providers are practically available and accessible to all members of the community, our consultations have highlighted the fact that the various bus services that many people in rural and regional NSW rely upon, are still practically or completely inaccessible. Specifically;
 - Where contracted or privately provided bus services exist, it is still the case that many of them are not operated with accessible vehicles, or are operated in such a way as to impede or negate accessibility of vehicles. Consultations highlighted widespread instances of inaccessible vehicles, non-functional lifts and other aids for people with disability or reduced mobility, stops positioned in such a way as to be inaccessible, or services not accommodating people with disability and people with mobility constraints, in the interests of service expediency.
 - Many school buses in rural and regional NSW are currently operated with inaccessible vehicles, directly excluding children with disability and isolating them from their schoolmates. Further, in many communities with extremely limited local transport, for older people and other disadvantaged people, school buses are the only regular service that exists. The inaccessibility of these services leaves older people and people with disability further disadvantaged, with even these limited transport services practically unavailable to them.
 - Many local and community transport services do not operate fully or even partially accessible services, and are currently not required to. In rural and regional communities where community transport, local transport and other embedded services (such as those provided by local clubs, sporting teams, churches, youth services) are the only connections that they have to their local community, inaccessibility of the vehicles used to provide these services serves to practically isolate and exclude people with disability, older people and the less mobile. With there being limited options for transport in many areas of the state it is crucial that the service options that do exist are practically accessible to all.

Recommendation 23

Review the policy on practical limits (formal or otherwise) to the number of wheelchairs and mobility aids able to be accommodated in each carriage of train services. In the event that there are fixed physical limits, consideration should be made to upgrading or retrofitting carriages used on rural and regional services. Longer term purchases of regional rolling stock should consider any current practical limitations, with purchase decisions accommodating larger allowances for mobility aids, or stock being flexible enough to accommodate more where required.

Recommendation 24

Guarantee an adequate minimum level of trained staff at all regional and rural train and major coach stops during all hours of operation, with recognition of their role in guaranteeing accessibility and safety of transport services.

Note: It is important to reiterate that Transport for NSW's own 'Disability Action Plan 2012-2017' makes specific and detailed reference to 'whole of journey accessibility'⁸ and the fact that accessibility is not just a function of individual infrastructure or vehicles of any mode of transport, but the system as a whole, including the linkages at every point, the information services and the staff support and assistance available. This plan also makes reference to 'equivalent access' and the fact that in the intervening period before the system is upgraded to full independent accessibility, direct assistance is likely to be required to ensure that all people can reliably access services. NCOSS recommends that staffing levels and practices be restored and retained to help ensure that the standards of Transport for NSW's own Disability Action Plan, are met.

Recommendation 25

Assess the planning and operation of replacement services, with implementation of a clear policy governing the way all arrangements are planned and undertaken. Particular attentions should be paid to;

- The accessibility of infrastructure at connections,
- The adequacy and accessibility of information, security and toilet facilities available,
- The accessibility of the replacement vehicles used,
- The planning of stops for replacement vehicles, and ensuring they are accessible, with all necessary equipment (such as wheelchair lifts and ramps) fully functional,
- That there are adequate staff at connection points on replacement services,
- That staff are trained and capable of dealing appropriately with passengers with disability, or those who are older or less mobile,
- That information regarding the replacement services is provided in advance, is accurate and comprehensive.

⁸ TfNSW 'Disability Action Plan 2012-2017', December 2012, pp 6-8. <http://www.transport.nsw.gov.au/content/transport-nsw-disability-action-plan-2012-2017>

Recommendation 26

Review the way information regarding the accessibility of replacement services is provided. Particular attention should be paid to ensuring information is provided in advance, is accurate, and is comprehensive regarding any potential accessibility issues with services, connections, staffing, boarding and alighting. This is particularly important in circumstances where the planning of replacement services will not allow full accessibility.

Recommendation 27

Harmonise passenger transport regulations and other policies governing local, school and community transport to ensure that there is a standard requirement for accessibility of vehicles used for all transport services. Any accelerated imposition of minimum accessibility standards must be accompanied by a significant expansion in funding and concessional loans to transport operators in rural and regional areas, to facilitate the purchase and conversion of appropriate vehicles.

6. Availability of accessible taxi services

Recent changes to the Taxi Transport Scheme, and the suite of measures supporting the provision of wheelchair accessible taxis (WAT) are very welcome, and a positive recognition of the importance of accessible taxis in the everyday lives of people with disability. However, in rural and regional NSW, particularly outside a few major regional centres, there are still serious issues with the availability of accessible taxis. Older people, the less mobile and people with disability are often forced to rely on taxis more heavily than other sections of the community, as there are no other accessible transport options for them. Accordingly, unavailability of taxis (either because they don't exist, are too few, or need to be booked too long in advance to be practical) often leaves people with disability without the ability to get to employment, treatment, support, community services and other basic requirements.

Recommendation 27

Review the WAT scheme to recognise the particular circumstances in rural and regional NSW, and address the need for additional incentive measures supporting the adequate provision of accessible taxi services in those areas. Consideration should be given to;

- Potentially requiring rural and regional taxi operators to have a minimum number of WATs available,
- Additional or preferred access to concessional loans for the purchase or conversion of WAT vehicles,
- Higher subsidy payments being available to the drivers of WAT taxis in rural and regional areas,
- A per journey payment cap in rural and regional areas higher than the current \$60 standard payment.

(c) Potential strategies to improve access, including better alignment between different modes of transport, available routes and timetabling generally

See recommendations relating to improved access and co-ordination as outlined previously in this submission.

(d) Support that can be provided to seniors and disadvantaged people to assist with the costs of private transport where public transport is either unavailable or unable to meet the needs of these groups,

- Aboriginal people in rural and regional NSW are significantly less likely to have a valid driver's licence, a tendency that is particularly problematic for young Aboriginal people living in remote rural communities, and a contributor to unlicensed driving and resulting incidents of incarceration. This significantly lower rate of licencing (50% of the Aboriginal population compared to over 70% of the non-Aboriginal population)⁹ is due to a range of factors that are particularly prevalent for Aboriginal people in remote rural NSW, including;
 - Difficulty in obtaining identification documents,
 - The financial costs of obtaining and maintaining a licence,
 - Rates of functional literacy that are lower than the non-Aboriginal population,
 - Difficulty in accessing an appropriate teacher and supervisor,
 - Difficulty in accessing vehicles for lessons and practice,
 - The existence of outstanding state debts.

The George Institute has been undertaking a research project 'Driving Change' looking at the effectiveness of driver licencing support in Aboriginal communities¹⁰. While there are a number of 'driver training' programmes, this project is more holistic and recognises the range of factors that often impede Aboriginal people in rural communities from getting their license. The project provides a range of support to navigate the administration, identification, instruction and practice to help overcome these.

This project has focused largely on several pilot communities, with a review of implementation suggesting significant success assisting Aboriginal people, particularly those between 16-24, in rural and regional communities to get licensed and be more independent. This pilot project is nearly complete, and an expansion of the programme, with a recurrent budget, would help support this important improvement in access to private transport.

Recommendation 28

Invest \$2.5 million to provide funding for a 5-year expansion of the 'Driving Change' programme, in 6 sites across Western NSW, the Far West and Murrumbidgee districts

⁹ Auditor General NSW. New South Wales Auditor-General's report to Parliament: improving legal and safe driving amongst Aboriginal People. Sydney. Audit office of NSW; 2013

¹⁰ The George Institute. Driving Change Project – website <http://www.georgeinstitute.org.au/projects/driving-change>