



Physical Disability Council of NSW
Ordinary People Ordinary Lives

Submission for the Senate Standing Committees on
Community Affairs

Delivery of outcomes under the National Disability Strategy
2010-2020 to build inclusive and accessible communities

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Who is the Physical Disability Council of NSW?

The Physical Disability Council of NSW (PDCN) is the peak body representing people with physical disabilities across New South Wales. This includes people with a range of physical disability issues, from young children and their representatives to aged people, who are from a wide range of socio-economic circumstances and live in metropolitan, rural and regional areas of NSW.

Our core function is to influence and advocate for the achievement of systemic change to ensure the rights of all people with a physical disability are improved and upheld.

The objectives of PDCN are:

- To educate, inform and assist people with physical disabilities in NSW about the range of services, structure and programs available that enable their full participation, equality of opportunity and equality of citizenship
- To develop the capacity of people with physical disability in NSW to identify their own goals, and the confidence to develop a pathway to achieving their goals (ie: self-advocate).
- To educate and inform stakeholders (ie: about the needs of people with a physical disability) so they are able to achieve and maintain full participation, equality of opportunity and equality of citizenship.

Introduction:

PDCN appreciates the opportunity to comment on the delivery of outcomes under the National Disability Strategy 2010-2020 to build inclusive and accessible communities.

As part of the submission on the delivery of outcomes under the NDS, the PDCN will provide comment on accessible housing, transport, and communication as outlined in the terms of reference. Additionally, PDCN will comment on potential barriers created by future funding arrangements for peak body advocacy.

The following submission will be separated as to reflect the terms of reference.

Accessible housing

- a. i.) **'...the planning, design, management, and regulation of: built and natural environment, including commercial premises, housing, public spaces and amenities.'**

Policy Direction 2

Improved accessibility of the built and natural environment through planning and regulatory systems, maximising the participation and inclusion of every member of the community.

Policy Direction 3

Improved provision of accessible and well-designed housing with choice for people with disability about where they live.

Issue 1 (Universal Design Standards):

PDCN recognises the creation of a comprehensive national voluntary accreditation system for universal design standards, as a key achievement of the NDS in its progress towards inclusive and accessible communities. However, there is still a lack of widespread implementation of Universal Design principles; Rights & Inclusion Australia (RIA) conducted review of the effectiveness of the voluntary approach, which estimated that less than 5% of the target set under the NDS will be achieved by 2020.¹

Issue 2 (Availability of accessible housing):

People with disability still experience difficulty finding accessible homes in both the private market (both rental and home buyers), and social and affordable housing.

Case study: PDCN member with a disability (powered wheelchair user with limited ability to stand) has been allocated social housing, however over the past two years, none can be found with the access requirements he needs, leaving the gentleman concerned to have to manage by leaving his powered chair outside the home, and transfer to a manual chair inside the home. In addition, neither wheelchair can access the bathroom, so the gentleman must then use his limited mobility to stand and undertake his bathroom routine upright. This has resulted in numerous falls due to instability, and significant health costs in hospitalisation and treatment.

Issue 3 (Home modifications under the NDIS):

PDCN acknowledges that the inclusion of home modifications under the NDIS is a great step towards building inclusive and accessible housing arrangements. However, there is concern that this initiative may not be as effective due to rental instability, public awareness of tenant rights, and tenant responsibility to restore property to original condition.

With a large number of tenants on a periodic agreement or short term lease, rental stability is not guaranteed for many people. For a person with a disability, this may mean installing costly home modifications over several properties, leading to increased costs for the NDIS and potential difficulties for modification expenses being approved in

¹ Report on the Progress of the National Dialogue on Universal Housing Design 2010-2014, p 8. (ANUHD/RIA 2015)

ongoing NDIS plans. Additionally, tenants who install modifications are legally required to return properties to their original condition upon leaving, the cost of which is unlikely to be covered by NDIS, and therefore, may deter participants from accessing modifications under the NDIS. Finally, many people with a disability may not be aware of their right as a tenant to install home modifications in a private rental agreement.

Recommendations:

- The implementation of mandated minimum standards of universal design for new dwellings and renovated properties. Furthermore, PDCN aligns itself with Australian Network for Universal Housing Design (ANUHD) assertion that this minimum standard should be Gold level or higher. This recommendation is also relevant in resolving long term availability of accessible housing.
- The implementation of incentives for property developers and councils to adhere to universal design standards.
- Creation of policies to ensure available accessible housing is given as a priority to people with disability in the private market.
- Increasing rental security through more tenant focused legislation (i.e. longer contracts).
- Educate tenants on their rights regarding home modification on a rental property.

Transport

- a. ii) ‘...the planning, design, management, and regulation of: transport services and infrastructure.’

Policy Direction 4

A public, private and community transport system that is accessible for the whole community.

Issue 1 (Public Transport – Stations):

PDCN recognises the general improvement of public transport accessibility within NSW; such as State Transit increasing the number of wheelchair-accessible buses to comprise 89.6 percent of its fleet in 2016.² Whilst this development is positive, there remain a range of barriers preventing full access to transport for wheelchair and mobility aid users, including the lack of paved/level pathways and kerbside access to designated bus stops.

Many train stations across NSW however are not accessible; in Sydney alone, less than half (42.7%) have wheelchair access facilities.³ While we acknowledge that this percentage has improved from 32% since 2007, the current Transport Access Program will only see another 20-30 stations made accessible (to some degree) by June 2022. It

² Quarterly Performance Information July – September 2016, p. 8 (NSW State Transit, 2016)

³ Transport for NSW Disability Action Plan 2012 – 2017 (Transport for NSW, 2012)

is PDCN's opinion that this transition should be expedited to align with the aims outlined by Policy Direction 4.

Furthermore, for many wheelchair users and those using mobility aids, accessible stations still require platform assistance from staff when boarding and alighting from trains. The consistency of support at stations is lacking and in some cases staff are not on hand upon arrival, often meaning that the person with disability cannot alight the train at the station required, and is left onboard at significant inconvenience to themselves. Additionally, the requirement to notify station staff prior to travel constrains possible travel, does not allow for 'spontaneous travel' and can significantly lengthen the travel process.

Issue 2 (Public Transport – Opal Cards):

PDCN members have reported that, in some cases, the implementation of the Opal card system has made accessing transport more difficult due to the height and location of some scanners and the requirement to tap twice (on and off). This is especially true for buses as there is often not adequate space and time when alighting.

Issue 3 (Transport under the NDIS):

PDCN acknowledges the point to point transport reforms as an important component to achieving accessible and inclusive communities. Specifically, we commend changes to wheelchair accessible taxis fees, subsidies, and incentives in order to increase availability and affordability for wheelchair users. Additionally, it is PDCN's opinion that increased support for community transport is also an essential positive addition under the point to point reform.

The implementation of a central point for WAT taxi bookings however, may make taxi travel for some individuals less convenient, as many individuals have current relationships with individual drivers, whom are aware and cater to specific personal needs, especially where this pertains to physical handling requirements, and there is concern that this choice of driver may not be available to them via the central contact point.

However, under the NDIS transport costs may increase due to the removal of subsidised rates on community transport and the implementation of other systems which will charge at market rates. The current transport subsidy available for NDIS participants for transport is insufficient to cover this increase.

Recommendations:

- Increase budget for train station modification to enable stations to be made accessible more rapidly.
- Assistance boarding and alighting remains an area for improvement, and alternative methods should be investigated to allow greater independence for people using mobility aids. The minimum improvement being a consistent means of ensuring ramp availability upon arrival at station.
- Modify the height and location of opal scanners on buses and at stations, and remove the tap off requirement for people with mobility issues.

- That the NDIS monitor funding for transport and adjust the transport allowance accordingly if it is found to be insufficient.

Communication and Information Systems

- a. **iii) ‘...the planning, design, management, and regulation of: communication and information systems, including Australian electronic media and the emerging Internet of things.’**

Policy Direction 1

Increased participation of people with disability, their families and carers in the social, cultural, religious, recreational and sporting life of the community.

Policy Direction 5

Communication and information systems that are accessible, reliable and responsive to the needs of people with disability, their families and carers.

Issue 1 (Adoption of accessibility features by commercial services and broader public):

PDCN recognises the Government’s attempt to lead by example through the Web Accessibility National Transition Strategy whilst this initiative is a positive step, it still has not reached its 2014 target of AA rating for all government websites. With increasingly innovative solutions to web accessibility, PDCN has witnessed positive, yet inconsistent improvements across a range of sectors in the online media space.

There is, however, still a lack of widespread adoption of a minimum standard of web accessibility. Essential services (i.e. energy and gas, telecommunications) often do not provide websites and/or documentation (i.e. billing statements, contracts) in accessible or easy read formats.

Issue 2 (Access to events via online booking):

Policy Direction 1 aims to *‘increase participation of people with disability, their families and carers in the social, cultural, religious, recreational and sporting life of the community.’* PDCN has received consistent feedback from its members that participation in social and cultural activities is unnecessarily difficult when attempting to book events using online formats. Online event booking for people requiring accessible seats cannot be undertaken; meaning people with disability must follow a slow, complex phone procedure to make a booking. In addition, due to seating arrangements, people with disabilities are often not able to sit with more than one other person from their party at many sporting, theatre and other events; isolating, rather than including them.

Issue 3 (Access to sporting and recreational services)

PDCN commends the steps taken by some sporting codes to develop accessible programs for people with disabilities, however believe that this is still limited, and in some cases accessible programs and normal programs run in ‘silos’, as opposed to including those with disabilities into mainstream programs.

In many cases, small local clubs are limited in their ability to include accessible programs due to the physical buildings/structures used not accessible in themselves,

and the cost to make them accessible prohibitive to volunteer led community organisations.

Recommendations:

- Mandating or incentivising commercial services to incorporate minimum standard of accessibility features on websites and other important documentation. Furthermore, it is PDCN's opinion that education to the broader public on web accessibility and its implementation, would increase accessibly formatted content on a broader scale.
- Automated online booking process should be made available to all people requiring accessible seats.
- Assisting clubs with grants to make physical buildings/other structures accessible to those with disabilities
- Provision of training for sport code staff, coaches and other support staff to enable understanding for inclusion of all abilities in the sport in which they are involved.

b. Potential Barriers to Progress or Innovation

Advocacy

Issue 1 (Removal of funding for peak bodies/representative organisations):

As of 30 June 2018, all NSW funding for disability representative organisations will be transferred to fund the NDIS. The remaining funding under the National Disability Advocacy Program (NDAP) will only be present until August 2017, awaiting outcomes of a review. The future funding of peak bodies and disability representative organisations is uncertain and PDCN believes that this will have a direct impact on NDS aims to create accessible and inclusive communities.

Peak bodies such as PDCN are essential for raising awareness about areas of need for their stakeholders, and identifying systemic issues that need to be addressed to improve life outcomes for all people with disability. As is the case in this submission, Government processes frequently rely on representative organisations for feedback and direction (i.e. progress reports/submissions).

Additionally, the contribution of the advocacy sector has shown tangible outcomes, all of which relate to the NDS priority areas of policy action. Below are some examples of PDCN's direct influence in delivering accessible communities via transport, housing and communication.

Outcomes in transport

"PDCN has lobbied to improve the physical accessibility of the NSW rail network. In 2015-16, twelve additional NSW stations were made fully or partially accessible. Of note, Artarmon station was made accessible in an upgrade that was the culmination of a 15 year campaign lead by PDCN former staff member and local resident. The

systemic resources of PDCN can support the efforts of its members, by lobbying decision-makers and participating in government processes.”

PDCN also sit as a member of Transport for NSW’s Accessible Transport Advisory Committee, working with Government to ensure best outcomes for accessible developments, inputting firsthand experience and advice of people with disability when using public transport.

Outcomes in housing/access to built environment

PDCN has worked with NSW Government and City of Sydney to advise on initiatives such as the accessible community gardens project, and wayfinding projects.

PDCN advocated for Step Free Access to the Sydney Harbour Bridge, which after nearly ten years will come to fruition with the implementation of lift access at both ends of the pedestrian side of the Bridge in late 2017 – early 2018. This was undertaken in conjunction with the NSW Roads and Maritime Services, Sydney Harbour Foreshore Authority and other Government and external bodies, and included PDCN providing expertise in design and requirements for the structures being developed.

PDCN partnered with the RACGP to mandate the use of height adjustable beds in all NSW general practices, enabling access to treatment for many people with disability previously unable to be treated in many examination rooms.

Outcomes in communications

PDCN published the Words Matter Language guide – a guide to appropriate language for the print and media industry, now used across many sectors as the ‘how to’ for acceptable and up to date appropriate language of disability. (Now in it’s 4th version)

Recommendation:

- Ensure ongoing funding is secured for peak bodies and disability representative organisations to continue to identify systemic issues and provide expertise to Government and other services.