



# COTA Victoria & Seniors Rights Victoria

*Submission response to the consultation on the draft  
Transport Accessibility Strategy*

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## *About Us*

Council on the Ageing (COTA) Victoria is the leading not-for-profit organisation representing the interests and rights of people aged over 50 in Victoria. For over 70 years, we have led government, corporate and community thinking about the positive aspects of ageing in the state.

Today, our focus is on promoting opportunities for and protecting the legal rights of people 50+. We value ageing and embrace its opportunities for personal growth, contribution, and self-expression. This belief drives benefits to the nation and its states alongside communities, families, and individuals.

Seniors Rights Victoria (SRV) is the key state-wide service dedicated to advancing the rights of older people and the early intervention into, or prevention of, elder abuse in our community.

SRV has a team of experienced advocates, lawyers, and social workers who provide free information, advice, referral, legal advice, legal casework, and support to older people who are either at risk of or are experiencing elder abuse. SRV supports and empowers older people through the provision of legal advice directly to the older person.

## *Executive Summary*

COTA Victoria and SRV welcome the opportunity to provide feedback on the draft Transport Accessibility Strategy (the Strategy) and support the efforts to create an accessible transport network.

Older people, including older people with a disability, are a key cohort that will be supported by the draft Strategy. This is essential, with Victoria getting older, and older Victorians accounting for a significant proportion of the population that have a disability.

It is essential that the future Strategy ensures older Victorians are supported and safe on their journeys, whether they are by private or public transport. For instance, we are currently concerned by the increasing number of people, particularly older people, being killed on the road post-pandemic, and longer-term trends around pedestrian deaths involving older people.

As part of this, we want the draft Strategy to be strengthened so that it can support the experiences of older people with a disability. We recommend:

- broader recognition of ageing and disability in the context of the Strategy,
- inclusion of affordability in the vision for the Strategy,
- a further objective on the need for transport to support how people live,
- an additional strategic direction around assistive technology,
- a stronger commitment to expand how public transport services are delivered utilising a broader variety of delivery models and vehicles,
- an additional strategic direction around public behaviour,
- an additional strategic direction to address digital exclusion,
- the provision of further information about the prioritisation framework,
- the development of an outcomes framework to support implementation of the Strategy.

We remain available and willing to work with the Department of Transport and Planning to support the refinement and implementation of the Strategy.

## Submission

### Broader feedback

While this submission answers the questions asked by this consultation below, it is important that we highlight broader issues that need to be considered as part of finalising the Strategy.

A key concern in regard to this Strategy is how it will impact our ageing population, including the large number of older people with a disability.

Age is recognised as a key factor in how people experience transport in the purpose and principles of the Strategy. This is welcome. However, we would urge that the Strategy include stronger recognition of the connection between age and disability, including the implications around Victoria's ageing population.

According to the most recent source of detailed national data - the Australian Bureau of Statistics' 2018 [Survey of Disability, Ageing and Carers](#) - some 479,600 Victorians over 65 years of age report having a disability. Looking at this from a whole-of-population perspective, 43.7% of all Victorians with a disability are aged over 65 years. This means that almost half of all disability needs are associated with older Victorians – and this is set to grow as the population ages and life expectancy further increases. This means that older Victorians are a significant cohort for this Strategy.

While we support the universal approach of the Strategy, the changing composition of Victoria's population is an important trend that should be recognised in the context of this Strategy, especially in relation to how it will impact people with a disability. For instance, the *Ageing Well in Victoria Action Plan 2022-2026* should be highlighted in the policy and strategic context. Transport is a key factor in how we age in our communities, which needs to be considered as we look at transport accessibility. How the transport system adapts to our ageing population is a key part of ensuring that transport in Victoria is accessible.

A clear example of this is our recent [submission](#) to the Legislative Assembly Economy and Infrastructure Committee's inquiry into the impact of road safety behaviours on vulnerable road users which identified longer-term trends around how older people will be affected on Victorian roads as the population ages.

**Recommendation 1: We recommend that there is greater recognition of the connection between ageing and disability in the context of the Strategy.**

### Approach

#### *Vision*

The proposed vision is largely appropriate; however, we believe that it could go further. While inclusive, easy to use and safe are worthy goals, the vision for transport accessibility should be broader.

This includes recognition of affordability. Affordability is a key consideration in accessing transport for older people with disability, and older people more broadly, on fixed incomes. If transport options are unaffordable, it means that they are inaccessible, especially if this is the case for

disability-specific aspects of travel. For instance, while the Multi-Purpose Taxi Program may offer discounts and a key way for people with a disability to travel, it can still be unaffordable for someone with a disability that is reliant on this service to get around.

**Recommendation 2: We recommend that the vision for the Strategy includes reference to affordability.**

### *Objectives*

Similar to the vision, we largely support the proposed objectives. However, a further objective is required that should recognise the need for transport to support how people live. While loosely touched on in the other objectives, a core component of transport accessibility is how it supports people with a disability to go about their lives. The proposed objectives capture how people should feel, but we propose an additional objective that captures how an accessible transport system should benefit its users' economic and social participation. This ties into the proposed principles around focusing on the whole journey and working across boundaries.

**Recommendation 3: We recommend that the Strategy includes a further objective on the need for transport to support how people live and their lifestyles, including social and economic participation.**

### *Principles*

We support the proposed principles which are appropriate and largely capture the most important aspects around making transport more accessible. In particular, we note the recognition of ensuring that age does not impact accessibility.

## **Strategic directions**

### *Assets*

We support the proposed strategic directions regarding assets. However, we recommend that there is an additional strategic direction to recognise the role and use of personal assistive technology (AT) for people with a disability and the need for assets to support this.

AT plays a key role in how people with a disability, including older people with a disability, economically and socially participate. It is often essential in supporting the use of all transport modes. While the strategic directions offer broader points on keeping stock and assets accessible, a specific commitment around ensuring that assets are interoperable with personal AT and supports is a direct obligation that will assist people with a disability to use transport.

COTA Victoria leads the Assistive Technology for All (ATFA) campaign, which is a national alliance of peak bodies and consumer advocates spanning the health, ageing and disability sectors, representing millions of people with disability, their families and carers. People with a disability often face a range of challenges around AT, particularly related to access to AT – access to

transport should not be one of these issues.

**Recommendation 4: We recommend that the Strategy includes a further strategic direction on ensuring that infrastructure and assets are interoperable with the AT and supports of people with a disability.**

### *Journeys*

While we largely support the identified strategic direction for journeys, we do have concerns regarding the highlighting of alternative transport options.

The proposed emphasis on aligning services and infrastructure, improving service standards, and ensuring better connections with more ways of meeting accessibility needs is appropriate and should help to make journeys more accessible.

However, the strategic direction around exploring how public transport services can be delivered utilising a broader variety of delivery models and vehicles (including taxis, rideshare and community transport vehicles) to meet accessibility needs should be strengthened.

A clear example of this is the identified case study of broadening the Multi-Purpose Taxi Program. The increase in vehicles and fees are an improvement. We have long supported the program – but have also consistently advocated for its expansion. The eligibility rules for the Multipurpose Taxi Program should be broadened from the current requirement of having a severe or permanent disability. This would allow older people with a temporary or less severe restriction on their mobility to save on transport costs. This offers clear benefits for older Victorians and Victoria more broadly.

Similarly, we know that community transport already plays a key role in filling gaps in accessibility – the benefits of this are currently being felt by some people with a disability. The concern around only ‘exploring’ the broader variety of delivery models and vehicles, including the Multi-Purpose Taxi Program and community transport, is that it will not lead to transformative changes, meaning we miss opportunities to improve service accessibility. They don’t need to be explored, they need to be expanded.

**Recommendation 5: We recommend that the relevant strategic direction be updated with new wording as follows:**

- **Expand the availability of alternative public transport services that can be delivered utilising a broader variety of delivery models and vehicles (including taxis, rideshare and community transport vehicles) to meet the community’s accessibility needs.**

### *Organisation culture and public behaviour*

We support the proposed strategic directions regarding organisation culture and public behaviour – however, there should be an additional strategic direction around public behaviour, which has a real impact on how people experience their journeys.

For instance, in a submission earlier this year on road safety we highlighted calls to the COTA

Information Line where older people expressed concerns about driving skills and behaviours. Those who have contacted us have raised concerns about drivers not stopping for pedestrians at corners, while passengers disembarking from trams have felt endangered by cars and bikes not stopping and trying to pass the stopped tram. We have also heard from older people that are concerned about the illegal use of e-scooters, particularly driving and parking on footpaths and other pedestrian thoroughfares. This is a real concern for older people, who are disproportionately killed or injured as pedestrians.

However, it is not just as pedestrians or passengers that older people are at risk of being on the wrong side of public behaviour – we know that older drivers are also facing instances of abuse or road rage. This speaks to a growing intolerance of older transport users. These issues highlight how the behaviour of other transport users affects older Victorians, and the need for other transport users to be aware and recognise the impact of their behaviour.

**Recommendation 6: We recommend that the Strategy includes a further strategic direction on public behaviour, which reflects the necessity to educate members of the public to be aware and recognise the needs of other transport users, including greater understanding and tolerance of older transport users.**

#### *Information and innovation*

We are concerned by the proposed strategic direction for information and innovation, as these are too vague to support effective implementation on actions taken based on the Strategy. It is not clear that these strategic directions will meet information needs so that people can plan their journeys more easily.

Our concern focuses on the directions to make information available, including in accessible formats. While we support the sentiment, these directions are not strong enough to deliver the change that people with a disability, particularly older people with a disability, need.

For instance, there needs to be a stronger commitment around ensuring that there is no ‘digital divide’ in accessing information. Digital technologies and information have a key role for some Victorians to access transport, however for some people in-person and phonenumber access to information is essential. While there have been improvements in recent years, and capability is deeply varied across the older cohort, digital exclusion is closely tied to age, as is experience of disability. Information cannot simply become a digital exercise. COTA Victoria has developed a guide for Commonwealth Home Support Program Providers on the inclusive use of digital and non-digital communications which highlights key information and tips.

**Recommendation 7: We recommend that the Strategy includes a further strategic direction with wording as follows:**

- **Ensure that people with a disability, particularly older people with a disability, do not experience any digital exclusion in accessing information.**

## Upgrades

We are concerned about the real-world impact of this approach to upgrades and recommend that further information and examples are provided on the prioritisation framework to support effective feedback.

While we understand the dual aspect of impact and location around prioritisation, and support the approach in theory, we are concerned, in particular, around the practical implementation of the impact ratings. For instance, it is not clear who will be making this designation and how they will come to that decision. There is a risk that government officials will decide a rating that does not align with the experiences of the people with a disability. The prioritisation framework should not lead to a situation that the most disadvantaged are isolated and held back.

We are also concerned that the prioritisation framework will allow for unnecessary and long delays to key changes and upgrades because they will be continually 'shunted' down the list due to identification of new upgrades that are deemed to have a higher priority.

We understand and support the need for a prioritisation framework. However, further information, examples and case studies should be provided so that the community can better understand how this framework will work in practice. This is the only way to provide informed feedback and is aligned with the Strategy's proposed focus on being user centric.

**Recommendation 8: We recommend that further information on the prioritisation framework is released publicly before the finalisation of the Strategy.**

## Implementation and Evaluation

The proposed approach around the update and expansion of the Accessible Public Transport in Victoria: Action Plan 2020 to 2024 (the Action Plan), means that the role of the Action Plan becomes even more important. While not relevant to the Strategy itself, we urge and recommend that there is effective engagement and consultation with the sector and community to inform the Action Plan.

We support the three measures proposed which should serve to give a rounded understanding and evaluation of the implementation of this Strategy.

However, while we support the proposed annual reporting arrangements, we propose the creation of an outcomes framework to support this process. The annual reporting process must hold the Strategy, Action Plan and implementation to account.

**Recommendation 9: We recommend that the Strategy includes an incorporated outcomes framework to support its eventual implementation and evaluation.**

## *Conclusion*

COTA Victoria and SRV support the Strategy and its intent to create a more accessible transport network. Travel, and access to it, is essential, especially as Victoria encourages its older citizens to age well in the community.

We are keen to highlight the issues affecting older Victorians, particularly those with a disability, in how they access transport – and ensure that the Strategy, and resulting Action Plan, are in a position to respond to these.

At the heart of our feedback is the need to ensure that the strategic direction and approach of the Strategy sufficiently recognises the needs of older Victorians. While older people are often identified as a key cohort, the details within strategies and plans can often miss out on aspects of their experiences, which lessens their impact.

With these changes, we believe the future Strategy can ensure that older Victorians are supported and safe on their journeys. The Strategy also offers a key opportunity to deliver improvements following the final report from the Commonwealth Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability. We remain keen to support the development of the Strategy following this consultation.

COTA Victoria and SRV also remain available and willing to inform the expansion of the Action Plan. There are a number of initiatives that could benefit older people with a disability. For instance, COTA Victoria and SRV have called for greater investment in driver awareness programs for older people, which can be inaccessible due to costs.