

Australian Disability Parking Scheme submissions (East Wing)
FaHCSIA
PO Box 7576
Canberra Business Centre ACT 2610

23 July 2009

Dear Sir/Madam

People With Disabilities (WA) Inc - PWD(WA) - welcomes the opportunity to contribute to the Inquiry into the Harmonisation of the Australian Disability Parking Scheme.

We understand the scheme aims to provide a new permit recognisable across Australia with improved rules around its use. This issue is pertinent to PWD(WA), the peak disability consumer lobby group in Western Australia representing people with disabilities (physical, intellectual, psychiatric and sensory) including children and youth. As a member of the Australian Federation of Disability Organisations we also support the recommendations made within AFDO's submission.

The recent review of the Disability Access to Premises Standards acknowledged the equal rights of people with disabilities to access places of employment, education, healthcare services, recreation and leisure, not to mention events, functions, shops, restaurants, and other community activities. Improving the access to parking is a vital element in ensuring people with disabilities can be active citizens in the community who participate in and enjoy the same daily activities as the 80% of the nation's population who live without a disability. As a signatory of the United Nations Convention on the Rights of Persons with Disability, Australia is bound to enable people with disabilities to become active community members. Harmonising parking permits will certainly assist in this.

General Comments

- PWD(WA) supports the use of a nationally consistent permit parking design.
- People have varying needs. Some people need to open their doors wider to get in and out of the vehicle. Others use a hoist to put a wheelchair on the roof of the car so need additional space at the side of the driving side. Some need to be able to access the boot easily to utilise their mobility aids.
- Eligibility criteria which assess how a person functions in the community, rather than by their medical diagnosis, must be clear and easy to understand.
 - a. This is vital to assist the people most in need of using the system.
 - b. Assessments need to be done in a standard manner by people who have an equal and good understanding of the myriad of challenges faced by people with disabilities.

- c. Not confining the assessments to a GP or specialist could make it easier for people with disabilities to be assessed. Unexpected health problems and long waiting lists can make it difficult to see specialists. Stress could be alleviated if, for example, a regular physiotherapist or other health worker could authorise the permit.
- Not everyone can reach parking meters to purchase requisite tickets.
 - a. The proposed concession of allowing twice the existing time limit on a parking sign is applauded. Permitting up to an hour for periods up to and including 30 minutes is also appreciated but such allowances need to be consistent across the nation. PWD(WA) believes the maximum of 12 months is adequate for temporary access.
- Harmonisation implies the scheme will be reciprocal amongst state and territories. However, as the discussion paper now reads, this would require changes to the proposed scheme as currently outlined. The goal of harmonisation ought to be to achieve equity. By this we mean enabling people with disabilities to access the same services as someone who does not have a disability. Given that disability often exacerbates the cost of living for someone with a disability we suggest the scheme ought to be free.
 - a. Such equity would mean each state uses a universal permit system, so it is concerning that one state, (NSW) proposes to continue with an individual system, which requires new permit designs to cater for credit card size pockets. Surely the goal of harmonising of the system is to establish a standard form of permit and categories across the country.
 - b. It is inexplicable why some states require users to pay for permits every two years whilst other states do not. A one off reasonably priced payment may be feasible, but regular biannual payments can be difficult for people already likely to be living in financial difficulties due to the associated costs of living with having a disability. Ideally people with disabilities would never need to pay for disabled parking permits.
- The International Symbol of Access (ISA) is a valuable and welcome tool to use on the permits.
 - a. It clearly identifies origin from Australia (and which specific state).
 - b. A nationally consistent permit parking design is vital for people who travel or move interstate. Parking officers do not always recognise permits from another state's jurisdiction. Clearly this is unacceptable
 - c. Permits are currently located in different spots within the car depending on the state/territory.
 - d. Reciprocal and consistent recognition of the permit nationally and internationally is valued as travellers visiting Australia, or Australians going overseas, may be entitled to use disabled parking bays in their own homeland. If driving whilst visiting in another country or state the person with a disability is still likely to need good access to disabled parking bays and a standard permit would simplify this arrangement.

- State and local governments must be consulted and included in developing the new scheme as well as disability groups and other key stakeholders.
 - a. The current system's allocation of concessions varies according to different local governments in each state/territory. People in Fremantle, for example, may not take kindly to being told to pay for an open parking spot when their ACROD permit currently enables them to park anywhere in that city for free whereas someone in Subiaco must pay whenever they use a paid meter, regardless of their permit.
 - b. A preferred solution would be to allow people using permits to park for free in timed meters for as long as necessary. Enabling people to park for a period for free would enhance many people with disabilities' access to the community and enrich their lives as well as that of the community in general.
 - c. Discussion is needed with private car park proprietors to ensure standardised schemes occur in these venues. City Park car parks in Perth currently give ACROD holders a discount on parking fees. Private companies like Wilsons do not. Compare this to Victoria where no discount is available for people using disabled bays in car parks – private or council based.
 - d. People who do not rely on mobility aids may also require the added time frame. Some may be able to only walk short distances due to heart or lung disorders, chronic conditions, autoimmune diseases, severe chronic fatigue syndrome or other conditions which regularly affect energy capacities. This may include people who rely on a cane, shopping trolley or pram to assist with their mobility.
- The added security features are welcomed.
 - a. These may assist in streamlining the administration of the permits.
 - b. Many of the people who use the parking scheme are vulnerable and need to be able to access venues quickly and safely.

Recommendations:

We offer the following recommendations and support the proposed scheme with some amendments.

1. Eligibility criteria based on a chronic condition such as paralysis or visual impairment should not require ongoing assessment. In such instances, assessors would need a list of those conditions which can have the permits automatically renewed.
 - a. Conditions which may be managed so the person no longer needs a permit, like fibromyalgia, would be more likely to be issued a temporary permit from the onset because a review of eligibility is more likely.

2. For the program to truly be harmonious it must employ the same minimum standards in eligibility criteria, including consistently applied concessions, permit designs and timeframes, across Australia.
 - a. 'Encouraging' individual jurisdictions to employ similar administrative processes across the nation could result in a lack of impetus to enforce.
 - b. Uniform criteria are necessary. People move and visit interstate. Eligibility in one place should be consistent across locations.
 - c. Concessions must be allocated in a standard manner. This involves making a variety of parking spaces available within each community to meet the needs of the mix of people who make up any community. It will be important to work in conjunction with those implementing the Access to Premises Standards which look at the dimensions of parking spaces, not just the quota.
3. Protecting the confidentiality and privacy of permit holders is a must.
 - a. Usage of photo identification attached to the permit is not supported.
4. Support the design which fixes on to the windscreen not hung from the rear view mirror.
 - a. Some drivers may have mobility difficulties in leaning forward and/or reaching up high.
 - b. Quadriplegics may not be able to dexterously place the permit. A rear view mirror permit is more likely to tear than the windshield permit design is to disintegrate due to sun elements.
 - c. The permit needs to be detachable. Individuals may need to transfer them for use when passengers in another person's car.
5. Address the enforcement of the permit in a uniform manner across the country.
 - a. Parking fines need to be significant and issued in a consistent manner in each state or territory to deter people parking illegally as not all councils issue infringements when cars park illegally in designated disabled parking bays.
 - b. Using larger print on the permits would address access concerns and aid in enforcement.

We trust the above comments are of use. Please do not hesitate to contact me on 08 9386 6477 or louise@pwdwa.org if you require any clarification.

Yours sincerely

Louise Durack
Executive Director