

Submission cover sheet

Your answers to the following questions will help us determine which area of the community you represent. Inclusion of your personal information is optional.

1. In which state or territory do you live? AAFCO is a national not-for-profit organisation.

2. Where do you live? Tick the relevant box below

Capital city Regional centre Rural Remote area

3. Do you belong to any of the following groups? (tick more than one box if appropriate)

A member of the public, that is, you are not a permit holder
 A permit holder (and/or a carer)

Type of permit held (e.g. a red permit in Qld) – please specify: _____

<input type="checkbox"/>	Support organisation (to people with mobility impairment)
<input checked="" type="checkbox"/>	Peak organisation that represents people with disability
<input type="checkbox"/>	Small to medium business enterprise
<input type="checkbox"/>	Large company
<input type="checkbox"/>	Local government
<input type="checkbox"/>	State or territory government
<input type="checkbox"/>	Commonwealth Government
<input type="checkbox"/>	Medical profession
<input type="checkbox"/>	Other – please specify _____

Your contact details (OPTIONAL)

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Australian Government

Department of Families, Housing,
Community Services and Indigenous Affairs

Internet privacy consent form – Send in with your submission

Consent to publish contact details and submission for the harmonisation of disability parking schemes in Australia consultation

I, Elizabeth McGarry of AAFCD (Australian Association for Families of Children with a Disability)

I hereby give my permission to the Department of Families, Housing, Community Services and Indigenous Affairs (FaHCSIA) to publish my personal information, such as contact details, in printed publications and/or multi-media applications, including the Internet, for the purpose of redirecting members of the public to me for a copy of my submission for the harmonisation of disability parking schemes consultation.

I also give my permission to the Department of Families, Housing, Community Services and Indigenous Affairs (FaHCSIA) to publish my submission for the harmonisation of disability parking schemes consultation. Usual copyright laws will apply.

I am aware that the above personal information may be printed in publications and/or used for the purposes of multi-media applications, including the Internet and may be viewed by members of the public.

I understand that I may withdraw my consent to publish the personal information at any time and as a result the Department of Families, Housing, Community Services and Indigenous Affairs (FaHCSIA) will arrange for this information to be removed from all future printed publications and withdrawn from the electronic media, including the Internet.

Dated this 31st day of July 2009

(Signature)

The Australian Association for Families of Children with a Disability (AAFCD) is a national organisation representing children with a disability and their families. We are funded through the Department of Families, Housing, Communities and Indigenous Affairs (FaHCSIA). We are a non-profit, community-based organisation. We work alongside families of children and young people with disability.

VISION

The vision of AAFCD is for children with a disability to be provided with the opportunity to live meaningful and fulfilling lives within safe, supportive and appropriate environments. As part of this vision AAFCD acknowledges the critical role that families play in providing the necessary care and support to children with a disability and recognises their need to be supported in this role. AAFCD will achieve this vision by:

1. **Educating** national public policy-makers and the broader community about the needs of children with a disability and their families.
2. **Advocating** on behalf of children with disability to ensure individual choices and the best possible support and services are available to them from government and the community.
3. **Informing** families about the rights and entitlements of the child with a disability to services and support.
4. **Celebrating** the successes and achievements of children with a disability.

GUIDING PRINCIPLES

The principles that guide the work of AAFCD are:

Children the priority: that the safety and well-being of children with disability is paramount and consistent with Australia's obligations under the international Convention on the Rights of the Child and the international Convention of the Rights of Persons with Disabilities.

Respect: for the views and interests of children with disability and their families.

Recognition: for contributions made by families to ensure the safety and well being of children with a disability.

Inclusion: to ensure that children with all types of disability, from all cultural and religious backgrounds and from different family structures are supported by the work of AAFCD.

Responsiveness: to ensure that full advantage is taken of strategic opportunities that arise from the political and social policy environment that benefit children with a disability.

Collaboration: with relevant non-government, government and private sector partners to promote the interests of children with a disability.

Transparency: within AAFCD's governance structures, decision-making processes, financial expenditure and reporting activities.

Feedback about the proposed Australian Disability Parking Scheme

1. Australian Disability Parking Scheme

Do you support all aspects of the proposed scheme?

Yes

No

If no, please comment on each of the proposals below.

Consistent eligibility criteria: permanent permit

Information: Under the proposed Australian Disability Parking Scheme, you would be eligible for a permanent permit if:

- **Criteria 1:** You are unable to walk and always require the use of a manual wheelchair or powered mobility device, **or**
- **Criteria 2:** Your ability to walk is permanently and severely restricted and you sometimes require the use of a mobility or medical aid. This does not include a walking stick, shopping trolley or pram, **or**
- **Criteria 3:** You do not use a mobility or medical aid but your ability to walk is permanently restricted by a significant medical condition or disability, which sometimes requires the physical assistance of another person and limits your access to the community.

2. Which statement best describes your view about the eligibility criteria for the proposed scheme?

<input type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>

I fully support all these eligibility criteria

I support one or more of these eligibility criteria, with minor amendments

I do not support any of these eligibility criteria

Please describe your concerns:

AAFCD is of the opinion that these criteria do not accurately capture the needs of all children with disability who require a disability parking permit. Many children and families would find accessing community venues impossible or too onerous without the availability of disability parking.

The criteria appear to focus on the aids or assistance required for mobility as a means of defining the need for a disability parking permit. It is

believed that the needs of the person with a disability should be the primary focus when establishing entitlement for a disability parking permit.

Under the proposed eligibility criteria the following examples would be ineligible.

Example 1 Child with an artificial leg who does not use mobility aides.

Example 2 Child who is 15 years of age with Asperger's Syndrome. He often refuses to move in the carpark because he has seen too many green cars which is upsetting for him. When situations are unsettling for him he sits on the road and refuses to move.

Example 3 Child with intellectual disability and significant behavioural issues who has severely compromised ability to assess personal safety.

Example 4 An 11 year old girl, Anna, with CP. She cannot walk unaided and only uses a wheelchair when long distances or time periods are involved. Where mobility is required, Anna uses a K Walker, is supported physically by her carer or she crawls.

Anna requires significant concentration for virtually all physical movement. Thus any significant movement (e.g. going to the shop) can be exhausting even when small distances are involved. Her uneven gait is highly inefficient, as are many children with CP, and requires significant physical effort to be expended. The cognitive and physical effort to remain independent mobile is extremely high.

Significant intervention and support has been tailored to assist Anna to achieve and maintain maximum physical movement. Walking with use of the K Walker is seen as a way of retaining fitness and maintaining better physical health. It is believed that it is best for Anna to keep out of a wheelchair and to walk for as long as possible into the future.

On adoption of the proposed criteria it would appear that Anna would no longer qualify for a disability parking space.

Criteria 1 states "*You are unable to walk and always require the use of a manual wheelchair or powered mobility device*". Anna does not meet the 1st half of the criteria in that she can walk with mobility devices. She does not meet the 2nd part of the criteria in that she does not **always** require a manual wheelchair and at times does not have a powered mobility device.

Criteria 2 states "*Your ability to walk is permanently and severely restricted and you sometimes require the use of a mobility or medical aid. This does not include a walking stick, shopping trolley or pram.*" Anna meets the 1st half of the criteria in that her ability to walk is permanently and severely restricted but not the 2nd. Anna **always** requires the use of mobility aids of one type or another. Anna requires a wheelchair, K Walker, or carer assistance.

Criteria 3 states "*You do not use a mobility or medical aid but your ability to walk is permanently restricted by a significant medical condition or*

disability, which sometimes requires the physical assistance of another person and limits your access to the community.” Anna does not meet the 1st half of the criteria in that she uses mobility aids and her ability to walk is permanently and severely restricted by her physical disability but not the 2nd. Anna **always** requires the use of mobility aids of one type or another; either wheelchair, K Walker, or physical assistance. According to this criteria she is then precluded.

Example 5 Child with severe scoliosis and extremely compromised respiratory function. She does not use mobility aids or physical assistance when walking. She is capable of walking short distances independently but needs to rest frequently and needs to minimise distance walked when accessing community.

How could the eligibility criteria be amended to meet your needs?

It is thought that the eligibility criteria need to be extended to include people with disability who find mobility difficult and do not require the use of aids or assistance to walk. For this cohort of people with a disability, walking can be undertaken independently but requires more time and effort.

AAFCD believes eligibility for a disability parking permit needs to be based on the assessment of the needs of the person with disability. The present criteria place significant emphasis on what mobility aids or physical assistance are required. They also only allow for physical factors which may impinge upon a person’s mobility and do not allow for other factors which can affect mobility or community access for people with disability. Many children with disability have significant behavioural issues which significantly impact on their ability to access the community. The availability of a parking space close to the entrance of a destination can often reduce the challenges faced by people and their families when accessing the community.

AAFCD believes that the criteria need to give some consideration to the needs of the family. In some instances the child with a disability in isolation may not be eligible for a disability parking permit under the proposed criteria or under the modifications suggested by AAFCD, but the additional needs of the child with the disability coupled with the needs of the family would make it impossible or extremely difficult to access the community. For example, a family needing to visit the supermarket – with infants or toddlers and a child with disability who has limited regard to personal safety or moderate behavioural issues.

The wording of the proposed criteria is confusing. Each criteria contains a number of elements. It is presumed that a person applying for a permit must meet all the elements within a criteria. As demonstrated in Example 4, in the above question, it is practically quite difficult to establish whether you meet each criteria.

Consistent eligibility criteria – temporary permit

Information: Under the proposed Australian Disability Parking Scheme, you would be eligible for a temporary permit if:

- **Criteria 1:** Your ability to walk is significantly restricted on a temporary (rather than permanent) basis and you sometimes require use of a mobility or medical aid. This does not include a walking stick, shopping trolley or pram, **or**
- **Criteria 2:** You do not use a mobility or medical aid but your ability to walk is restricted by a significant medical condition or disability, which requires the physical assistance of another person and limits your access to the community for the temporary period.

Temporary permits will be issued for a minimum of six months and a maximum of 12 months. Arrangements for extending permit eligibility will continue to be managed separately by state and territory administrators.

3. The minimum period for temporary permits of six months is:

Just right

Too short

Too long

Please explain the reason for your choice and describe your suggested alternative:

This is viewed as a satisfactory period for a temporary physical or medical condition to recover and rehabilitate. For example, a person with a broken leg.

3.1. The maximum period for temporary permits of 12 months is:

Just right

Too short

Too long

Please explain the reason for your choice and describe your suggested alternative:

Some people have temporary conditions which are present for longer than twelve months and which affect their mobility or ability to access the community. For example, oncology outpatients undergoing treatment would not meet the proposed criteria for a permanent permit. This maximum period either needs to be extended or there needs to be a simple way of extending a temporary permit without the need to re-submit information previously provided. Example – the provision of a statement declaring that *the need for a disability parking permit remains*

unchanged (rather than submitting a completely new application).

4. Consistent eligibility criteria, all permits

The following statements apply to the proposed eligibility criteria overall. Please select only one response to each statement.

4.1. The eligibility criteria are clear and easy to understand.

Strongly disagree Disagree Neutral Strongly agree Agree Don't know

4.2. The proposed eligibility criteria will help the right people.

Strongly disagree Disagree Neutral Strongly agree Agree Don't know

4.3. There is a need for consistent eligibility criteria across Australia.

Strongly disagree Disagree Neutral Strongly agree Agree Don't know

National minimum standards for disability parking permit concessions

Permit holders may park in reserved parking spaces displaying the International Symbol of Access (ISA). The following concessions would apply in other parking spaces:

1. If the parking sign is up to and including 30 minutes - up to one hour.
2. If the parking sign is more than 30 minutes - twice the time limit.
3. Parking meters – time limit extension arrangements apply after the maximum period indicated on the meter has been reached.

Points 1 and 2 relate to territory and/or local government operated parking areas.

5. Select the (one) response that best describes your view about the disability parking permit concessions.

<input type="checkbox"/>	I fully support the proposed minimum standards for parking concessions
<input checked="" type="checkbox"/>	I support these concessions, with minor amendments
<input type="checkbox"/>	I do not support these concessions

I would prefer that concessions are consistently applied across all states and territories.

Please describe your concerns: Criteria 1 states “up to 1 hour”. For some people with

disabilities and their families it would be difficult or impossible to access community venues if parking less

than hour was available for some people take 10 minutes to get out of the car and additional time to

move to specific destination by foot, wheelchair, walker or other.

How could the concessions be amended to meet your needs?

Ensure people with disability have at least 1 hour of available parking.

6. Parking concessions

The following statements apply to parking concessions. Please select only one response for each statement.

6.1. There is a need for consistent parking concessions across Australia.

Strongly disagree

Disagree

Neutral

Strongly agree

Agree

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6.2. The proposed concessions are clear and easy to understand.

Strongly disagree

Disagree

Neutral

Strongly agree

Agree

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6.3. The proposed concession of twice the time limit on the parking sign will adequately meet the needs of permit holders.

Strongly disagree Disagree Neutral Strongly agree Agree

6.4. The proposed ticket/meter parking concession where the time extension occurs after the maximum time limit is reached is fair and reasonable.

Strongly disagree Disagree Neutral Strongly agree Agree

National disability parking permit design

Information: Proposed options for the disability parking permit design

Under the proposed Australian Disability Parking Scheme, there would only be one style of parking permit for eligible disability parking permit holders recognised throughout Australia.

The disability parking permit would include two options, namely:

- **Option A:** A permit fixed to the inside of the windscreen.
- **Option B:** A permit to be hung from the rear view mirror once the car is parked.



7. Choose the response that best describes your views about the disability parking permit designs.

- | | |
|---|---|
| | I fully support Option A design for the disability parking permit |
| √ | I fully support Option B design for the disability parking permit |

<input type="checkbox"/>
<input type="checkbox"/>

I support one of the proposed design for the disability parking permit with minor amendments

I do not support any of the proposed designs for the disability parking permits

Please provide your reasons for your view and suggested amendments:

People with disability, as with any person, often travel in different cars. The use of a permit for one car only would restrict a person's options for community access. A way of addressing misuse of permits by ineligible individuals could be addressed by issuing photo Identification cards which could be carried by the permit holder and produced to relevant authorities if required. Cars would display a permit as proposed.

8. Disability parking permit design

The following statements relate to permit design. Please select only one response for each statement.

8.1. The proposed disability parking permit design will be easier to use than my current permit.

Strongly disagree

Disagree

Neutral

Strongly agree

Agree

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8.2. The proposed design will make it less likely to lose the permit.

Strongly disagree

Disagree

Neutral

Strongly agree

Agree

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8.3. The proposed design will reduce the opportunity for fraud.

Strongly disagree

Disagree

Neutral

Strongly agree

Agree

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8.4. There is a need for a common disability parking permit design across Australia.

Strongly disagree

Disagree

Neutral

Strongly agree

Agree

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9. Australian Disability Parking Scheme

The following statements relate to the proposed scheme overall. Please select only one response to each statement.

9.1. The proposed scheme will be less confusing for people who travel or move interstate.

Strongly disagree

Disagree

Neutral

Strongly agree

Agree

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9.2. The proposed scheme will increase the availability of disability parking for those who really need it.

Strongly disagree

Disagree

Neutral

Strongly agree

Agree

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9.3. The proposed scheme will limit abuse by those who should not really have a permit.

Strongly disagree

Disagree

Neutral

Strongly agree

Agree

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9.4. Overall, the proposed scheme will be more effective than the current schemes.

Strongly disagree

Disagree

Neutral

Strongly agree

Agree

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Part 2: Additional comments about the proposed Australian Disability Parking Scheme

This part is provided for you to make additional comments, in your own words, on the proposed scheme. Your comments are welcomed and will be considered before a decision is made; making such additional comments is, however, entirely optional.

Many families of children with disability have stated concerns that there are simply not enough parking places allocated. It is often reported that it has not been possible to access the community because designated disability parking is utilized or at times is unavailable

The differing needs of people with disability in regard to disability parking and community access should be reflected in the communities' allocation of disability parking spaces.

Member consultation regarding needs for disability parking reflected the need for many with physical disability to have parking in immediate proximity to entrances and to have larger spaces which accommodate the room needed to transfer a person with a disability to their wheelchair or to utilize their mobility aid. This group of people has physical aspects of disability which impact on their mobility.

The other groups identified by AAFCD in this submission as requiring disability parking have a need for parking that is in close proximity, not immediate, to entrances but there is no requirement for larger spaces.
