

Submission to the draft National Road Safety Strategy 2021-2030 March 2021



MACA - with you on every journey

MACA LTD

Mobility & Accessibility
for Children in Australia

What is your primary area of interest in road safety?

As Chief Executive of Mobility and Accessibility for Children in Australia (MACA Ltd), my primary interest is to ensure that the road safety needs of our most vulnerable community members – children with disability and medical conditions – are met. An important first step is to ensure the road safety needs of children with disability are made visible in important road safety strategies such as the *National Road Safety Strategy 2021-30*.

In 2018, almost one-in-five Australians reported having a disability and the average Australian can expect to live one-fifth of their life with some level of disability.¹ 7.4 per cent of Australian children (0-14) are estimated to have a disability.²

Children with disability are particularly vulnerable road users. Research shows they face an increased risk of injuries and fatalities in a crash compared to other children. A literature review in 2019 reflected little change in how children with disability are being transported since a previous review in 2001, noting that “children with disabilities continue to be inappropriately restrained in vehicles, constituting an ongoing road safety problem.”³ Research (2013) also shows that 74% of children with autism escape their child restraint, and more than 20% of parents report their child demonstrates aggressive or self-injurious behaviour during travel, affecting their safety and that of others.⁴

MACA has recently received preliminary data from our national survey, developed in partnership with Curtin University. This survey is revealing for the first time in Australia the extent of the issue of children getting out of their restraints whilst the vehicle is moving, and driver distraction. MACA expects the final data to reflect a similar experience found in the earlier research from America.

Bringing visibility to the challenges in transporting children with disability amongst the Australian road safety community, allied health professionals and policy makers is an important first step to improving road safety (and other) outcomes for vulnerable children and their families.

It is interesting that ‘children’ are not mentioned in the *National Road Safety Strategy 2021-30* – let alone children or people with disability. There is a photo of a woman in a wheelchair, but we note that there are no specific actions to address the road safety needs of people with disability.

Real road safety outcomes for all can only be achieved when we consider the needs of our most vulnerable. All children, including children with disability, have a human right to safe and accessible transport. However, the rights of children with disability are not being met equal to children without disability, constituting an ongoing road safety problem. MACA’s preliminary survey data indicates the impact of the neglect of children with disability and medical conditions, and their families, in road safety strategies and action plans.

¹ National Disability Strategy Position Paper, July 2020, Australian Government, Department of Social Services

² Australian Institute of Health and Welfare 2020. Australia's children. Cat. no. CWS 69. Canberra: AIHW. Viewed 21 March 2021, <https://www.aihw.gov.au/reports/children-youth/australias-children>

³ Angela Downie, Angela Chamberlain, Rebecca Kuzminski, Sharmila Vaz, Belinda Cuomo & Torbjörn Falkmer (2019): Road vehicle transportation of children with physical and behavioural disabilities: A literature review, *Scandinavian Journal of Occupational Therapy*, DOI:10.1080/11038128.2019.1578408

⁴ Janell Yonkman, Bryanna Lawler, Judith Talty, Joseph O’Neil, Marilyn Bull (2013): Safely Transporting Children with Autism Spectrum Disorder: Evaluation and Intervention. *American Journal of Occupational Therapy*, 67, 711-716. <http://dx.doi.org/10.5014/ajot.2013.008250>

What road safety issues are the most important to address?

If we are to eliminate road trauma in Australia by 2050, we need to reach the furthest behind first. We must consider the road safety needs of our most vulnerable, including children and adults with disability. We must ensure that the road safety experiences and needs of people with disability are reflected in this national road safety strategy, including the right to safe and accessible transport for all people.

This strategy must reflect the commitments that all Commonwealth, State and Territory governments made when they signed the National Disability Agreement in 2008 and endorsed the National Disability Strategy 2010-2020. The National Disability Strategy is the primary mechanism through which Australia implements its obligations under the United Nations Convention on the Rights of Persons with Disabilities.

The vision of the National Disability Strategy 2010-2020 is an inclusive Australian society that enables people with disability to fulfil their potential as equal citizens. To achieve its vision all Australian governments, non-government organisations, businesses and the wider community have a role to play in ensuring their policies, programs and services consider the needs of people with disability, remove barriers to inclusion and ensure people with disability are involved in development and implementation processes.

MACA is supportive of the inclusion of vulnerable road users as a priority area in the strategy. However, the definition of vulnerable road users (VRUs) in the strategy is very narrow. The strategy defines vulnerable road users as:

*road users not in a car, bus or truck, generally considered to include **pedestrians, bike riders and motorbike riders***

While the strategy expresses a commitment to *safe transport options for all ages and abilities, including the most vulnerable in our communities*, the actions listed to address this priority focus only on these three road user groups. There are currently no actions that address the road safety needs of people with disability.

MACA calls for:

- Broadening the strategy definition of vulnerable road users so that it includes both vulnerable road users (including children and people with disability) and unprotected road users (pedestrians, bike riders and motorbike riders). MACA notes that Vulnerable and unprotected road users is a strategic focus area of the Victorian Road Safety Strategy 2021-2030.
- Targeted consultation with people with disability to better understand their lived experiences in relation to the road safety issues that impact on their safety and participation in community life. This consultation could help inform the actions in the National Road Safety Strategy Action Plan. MACA notes the oversight of consultations to date, with no representation from disability organisations or people with lived experience. MACA is currently undertaking a national survey to understand the experiences, perceptions and knowledge of parents/guardians, health professionals and organisation/government representatives about transport for children with disability and medical conditions. MACA is happy to discuss the preliminary results with the Office of Road Safety to help inform this strategy.

What do you believe are the strengths of this draft Strategy?

A key strength of this strategy is its adoption of the social model approach to road safety. MACA's approach is also based on the social ecological model. We work with non-traditional road safety stakeholders to expand the understanding of the safe system across the community. For example, we work closely with the health and disability sectors, as well as equipment suppliers and industry, to raise awareness of the importance of road safety for children with disability and medical conditions, who are already at heightened risk of injury and death on the roads.

MACA agrees that 'broad and shared responsibility' for road safety is the key to achieving improved road safety outcomes.

However, despite the draft strategy presenting a strong narrative and expressed commitment to the social model approach to road safety, this is not reflected in the priorities and actions of the strategy.

Is there anything important that you think is missing from this draft Strategy?

Education is an important component of the safe system approach but appears to be excluded from the *National Road Safety Strategy 2021-30*. Community based education is an important lever of change with great potential to activate a 'whole of community', social model approach. Targeted, evidence-based education for professionals who have responsibility for and/or accountability of the safe transportation of children is critically needed. Preliminary data from our national survey shows the majority of Australian health professionals report they don't feel they have the level of knowledge and skill required to address car seating and travel needs for children with disability and medical conditions. In addition, many parents are reporting that they have never received any information on how to safely transport their child.

The Australian Human Rights Commission in its submission (2019) to the United Nations Committee on the Rights of Persons with Disabilities noted its concern that legislation, policies, programs, service standards, operational procedures and compliance frameworks that apply to children and young people generally do not incorporate the rights of children with disability. It further noted its concerns regarding the gaps in accessibility for people with disability relating to emerging forms of transport services; ride sharing services; emerging technology and digital accessibility.⁵

All children, including children with disability, have a human right to safe and accessible transport. However, the rights of children with disability are not being met equal to children without disability – and are not protected in this strategy. Inclusion of the safety and well-being of ALL Australian road users should be at the core of the strategy, removing barriers to equality. It is well studied that countries that succeed in advancing equity see gains in productivity, greater social consensus and

⁵ Australian Human Rights Commission (25 July 2019) Information concerning Australia's compliance with the Convention on the Rights of People with Disabilities. Retrieved from https://humanrights.gov.au/sites/default/files/int_crp_d_nhs_aus_35594_e.pdf



**Mobility & Accessibility
for Children in Australia**

*We pay respect to the Traditional Custodians of all
lands, past, present & future. Honouring our Elders
& nurturing all young people*

