# Vision Australia

# Mobility Parking Schemes Position Statement

**June 2020**

# Position Statement summary

People who are legally blind and who use a mobility aid, such as a white cane or dog guide, often need some assistance from the driver of a motor vehicle in which they are a passenger to find their way from the vehicle to their destination. This is especially necessary if there are no specific wayfinding cues, such as braille signage and tactile ground surface indicators. Having access to mobility parking schemes enables a vehicle in which a person who is blind and uses a mobility aid is a passenger to park in an accessible parking space and make use of other parking concessions. This allows drivers and passengers to provide assistance to a person who is blind and has a mobility aid to safely leave and enter the vehicle due to the proximity of accessible parking spaces to pedestrian exits and building entrances. Various state-based and local government mobility parking schemes operate throughout Australia, but vary in terms of their eligibility criteria. Some jurisdictions define eligibility in terms of the functional capacity to walk, with only NSW and the ACT specifically including blindness as an eligibility criterion. Given the significant benefits that mobility parking schemes offer to people who are blind and use a mobility aid, the Australian Government must work proactively with the States and Territories to implement consistent eligibility criteria.

If you would like this position statement in an alternative format or wish to discuss it with Vision Australia’s Government Relations and Advocacy team, please contact us:

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# Definition of Legal Blindness

Through this Position statement, the terms “blind” and “legally blind” are used synonymously. A person assessed as being legally blind is eligible to receive a range of government services, including the Disability Support Pension (Blind).

For assessment purposes, the *Social Security Act 1991* and the current *Guide to Social Security Law Version 2.201* provide the following definition for legal blindness:

“A person is assessed as blind if they meet the following criteria:

* corrected visual acuity on the Snellen Scale must be less than 6/60 in both eyes, or
* constriction to within 10 degrees or less of arc of central fixation in the better eye, irrespective of corrected visual acuity, or
* a combination of visual defects resulting in the same degree of visual impairment as that occurring in the above points.” [[1]](#footnote-1)

# Background

This position statement is founded on principles that are set out in the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). The UNCRPD is the most complete expression of the human rights enjoyed by persons with disability. Australia has signed and ratified the UNCRPD, and hence is bound by the obligations that it establishes.

Article 20 of the Convention asserts the right of people with disability to have freedom and independence of personal mobility. It begins:

“States Parties shall take effective measures to ensure personal mobility with the greatest possible independence for persons with disabilities, including by:

a. Facilitating the personal mobility of persons with disabilities in the manner and at the time of their choice, and at affordable cost;”

Motor vehicles are an essential means of independent and convenient mobility for participation in economic, social, cultural, and community life throughout the world. Although people who are blind cannot safely drive a motor vehicle independently, they are frequently passengers in motor vehicles driven by taxi drivers, colleagues, family or friends.

Blindness is a disability that, in and of itself, does not make it more difficult to be a passenger in a motor vehicle. People who are blind use a range of mobility aids such as dog guides, white canes, and various electronic devices, as well as personal travel skills, in order to travel throughout the community safely and with confidence.

However, there are practical consequences of blindness that often make the use of a motor vehicle in conjunction with standard parking arrangements more difficult and stressful, and less safe. Examples include:

* People who are blind may require orientation to their immediate surroundings, or assistance in finding a particular building, or locating the lifts or other specific part of a building. In many city areas, drivers may be unable to park or leave their vehicle to provide this assistance owing to the prevalence of “no stopping” and “no standing” zones.
* People using dog guides may find it difficult to open the passenger door wide enough to allow easy entry and exit when parked in a narrow parking space, especially if the dog is being used “on lead” rather than in harness.
* People who are blind often find it difficult, stressful or dangerous to cross busy carparks, even when accompanied by a sighted guide. The acoustics within car parks often make it difficult to judge the proximity of nearby cars and obscure other auditory cues that are used to facilitate navigation in other areas.

These and other examples reflect a systemic and long-standing failure to take sufficient account of the needs of people who are blind in the design of the built environment. A lack of tactile and braille signage, directional indicators, and accessible maps can make it extremely difficult for people who are blind and who use a mobility aid to negotiate unfamiliar buildings and busy urban areas.

Being able to access the benefits of mobility parking schemes helps reduce the systemic barriers that people who are blind regularly face and allows greater independence, safety, amenity and convenience when using motor vehicles. Advantages include:

* Accessible parking spaces are usually located near lifts or other pedestrian exits to car parks, and are therefore more convenient for the driver or other passengers to provide assistance. They are also safer for dog guides, and make it easier for a person who is blind to find their way independently from the car park if they are using it on a regular basis.
* Drivers are able to park in certain zones that are usually not available (such as “no sanding” zones) and this makes it easier to provide assistance. Without access to these zones it can be almost impossible to find appropriate parking in busy urban areas.
* Being able to park in a metered parking space for a reduced charge or for extra time makes it easier for the driver or other passengers in the vehicle to provide assistance to a person who is blind and uses a mobility aid. This is especially true if the person with vision loss must find specific locations within a large building. For example, attending a medical appointment may involve finding the location of a specific doctor through a building directory, using the lift to go to the specific floor, locating the appointment room and then completing a patient information form. All of the activities above would be impossible for a person who is blind without assistance.

Australian States and territories administer their own mobility parking schemes. People who have a permit issued as part of such a scheme are entitled to park in an accessible parking space and to a number of other parking concessions. For example, a permit holder may be allowed to park in a “no standing area” for 30 minutes and to park in an on-street metered parking space for a reduced charge or double time allocation.

Eligibility criteria for these mobility parking schemes vary from State to State, and in some cases, they also vary from shire to shire within a state. NSW and the ACT are the only two jurisdictions that specifically include blindness as a sufficient eligibility criterion. Following a consultation process in 2010, The Australian Government introduced an Australian Disability Parking scheme, which was intended to consolidate the various schemes that existed across Australia.[[2]](#footnote-2)

The Australian Disability Parking Permit (ADPP) established new eligibility criteria that emphasise functional limitations rather than specific disability. However, there is no specific reference to people who are blind, and it is unclear from the criteria whether a person who is blind and who uses a mobility aid would be eligible for a permit under the Scheme. The ambiguity of eligibility criteria under the ADPP has allowed different jurisdictions to continue applying their own criteria. Despite the legitimate claim of people who are blind and who use a mobility aid to access a scheme, their eligibility remains uncertain in many jurisdictions and overtly excluded in others.

# Position Statement

1. People who are legally blind have a right to freedom and independence of mobility, as asserted in Article 20 of the UN Convention on the Rights of Persons with Disabilities. All elements of society have a responsibility to proactively acknowledge the existence of widespread systemic barriers to independent mobility by working to remove them.
2. In recognising the importance of mobility parking schemes to independent mobility, policy must provide certainty of access to the use of accessible parking spaces and other concessions by people who are blind and who use a mobility aid. This would allow drivers and other passengers to provide assistance more easily, increasing safety, and maximising overall amenity and convenience in the use of motor vehicles.
3. Nationally consistent eligibility criteria for mobility parking schemes must be set and administered across all jurisdictions, and must specifically include blindness.
4. In determining eligibility for mobility parking schemes, authorities must use methods of assessment that are fair, consistent and minimally intrusive. At a minimum, eligibility criteria must grant access to individuals who, because of their blindness, are ineligible to hold a driver’s licence and who require the use of a mobility aid, such as a white cane or dog guide, when moving around the community.

## About Vision Australia

Vision Australia is the largest national provider of services to people who are blind or have low vision in Australia. We are formed through the merger of several of Australia’s most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision is that people who are blind or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision or have a print disability, and their families.

Vision Australia service delivery areas include: registered provider of specialist supports for the NDIS and My Aged Care Aids and Equipment, Assistive/Adaptive Technology training and support,

Seeing Eye Dogs, National Library Services, Early childhood and education services, and Feelix Library for 0-7 year olds, employment services, production of alternate formats, Vision Australia Radio network, and a national partnership with Radio for the Print Handicapped, NSW Spectacles Program and Government Advocacy and Engagement. We also work collaboratively with Government, businesses and the community to eliminate the barriers our clients face in making life choices and including fully exercising their rights as Australian citizens.

Vision Australia has unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 26,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of our organisation. Vision Australia is well placed to advise governments, business and the community on challenges faced by people who are blind or have low vision as well as they support they require to fully participating in community life.

We have a vibrant Client Reference Group, comprising of people with lived experience who are representing the voice and needs of clients of our organisation to the board and management.

Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment. Vision Australia also has a Memorandum of Understanding with, and provides funds to, Blind Citizens Australia, to strengthen the voice of the blind community.

Position statement ends.

1. Department of Social Services (2014), Guide to Social Security Law Version 2.201. Canberra, ACT, pp.210. Retrieved from <http://guidesacts.fahcsia.gov.au/guides\_acts/ssg/ssguide-1/ssguide-1.1/ssguide-1.1.p/ssguide-1.1.p.210.html> [↑](#footnote-ref-1)
2. The Hon Bill Shorten, MP (2010, June 4). Disability ministers endorse Australian Disability Parking Scheme [press release]. Retrieved from <<http://jennymacklin.fahcsia.gov.au/node/807>> [↑](#footnote-ref-2)