

OC2241063

7 October 2024

[REDACTED]
Tēnā koe [REDACTED]

I refer to your email dated 9 September 2024, requesting the following under the Official Information Act 1982 (the Act):

"I request information, policy and aide memoire used in the development of the Review of the Total Mobility Scheme, in the time period July 2023 to August 2024."

I have interpreted the scope of this request to cover all briefings and aide-memoires provided by the Ministry of Transport to the Minister of Transport during the requested time period.

Seven documents fall within the scope of your request and are detailed in the document schedule attached as Annex 1. The schedule outlines how the documents you requested have been treated under the Act.

Certain information is withheld under the following sections of the Act:

- 9(2)(a) to protect the privacy of natural persons
- 9(2)(b)(ii) to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information
- 9(2)(f)(iv) to maintain the constitutional conventions for the time being which protect the confidentiality of advice tendered by Ministers of the Crown and officials

With regard to the information withheld under Section 9 of the Act, I consider the reasons for withholding that information at this time are not outweighed by any public interest considerations that would make it desirable to make the information available.

You have the right to seek an investigation and review of this response by the Ombudsman, in accordance with section 28(3) of the Act. The relevant details can be found on the Ombudsman's website www.ombudsman.parliament.nz

The Ministry publishes our Official Information Act responses and the information contained in our reply to you may be published on the Ministry website. Before publishing we will remove any personal or identifiable information.

Nāku noa, nā

Nick Potter

Nick Potter
Acting Manager, Urban Development and Public Transport

Annex 1: Document Schedule

Table 1 OC241063 Document Schedule

| Doc # | Reference number | Date | Title of Document | Decision on request |
|-------|------------------|------------|--|--|
| 1 | OC230330 | 19/07/2023 | Total Mobility Review (Terms of Reference) | Released with some information redacted under section 9(2)(a) |
| 2 | N/A | 18/03/2024 | Minister Brown Weekly Report | Excerpt from Weekly Report to the Minister of Transport as attached, released with some information redacted under section 9(2)(f)(iv) |
| 3 | OC240432 | 1/05/2024 | Total Mobility Scheme Review - Update | Released with some information redacted under sections 9(2)(a) and 9(2)(f)(iv) |
| 4 | OC240431 | 10/05/2024 | Meeting with the Small Passenger Service Association - 14 May 2024 | Released with some information redacted under section 9(2)(a) or information is out of scope |
| 5 | N/A | 13/05/2024 | Minister Brown Weekly Report | Excerpt from Weekly Report to the Minister of Transport as attached, released with some information redacted under 9(2)(f)(iv). |
| 6 | OC240554 | 7/06/2024 | Total Mobility Scheme Review - Next Steps | Released with some information redacted under section 9(2)(f)(iv) and 9(2)(a) |
| 7 | N/A | 19/08/2024 | Minister Brown Weekly Report | Excerpt from Weekly Report to the Minister of Transport as attached, released in full |

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19 July 2023

OC230330

Hon David Parker
Minister of Transport

Action required by:
Monday, 31 July 2023

TOTAL MOBILITY REVIEW (TERMS OF REFERENCE)

Purpose

To seek your approval of the finalised Terms of Reference for the review of the Total Mobility Scheme.

Key points

- The Total Mobility Scheme provides discounted transport services to people who are unable to use buses, trains or ferries in a safe and dignified manner because of a physical, intellectual, psychological, sensory or neurological disability.
- Reviewing Total Mobility is one of the actions the Ministry has committed to under the all of government Disability Action Plan 2019-2023.
- In August 2022, Waka Kotahi NZ Transport Agency published the research report *Transport experiences of disabled people in Aotearoa New Zealand*. This research found that Total Mobility costs time and effort and is sometimes an unreliable or unavailable transport option.
- The last review of Total Mobility was completed in 2005 and did not result in meaningful improvements to accessibility. An updated review of Total Mobility was signalled to the sector in 2021. It is timely to review Total Mobility to identify key issues and take action to improve the effectiveness of the scheme.
- We are seeking your approval of the finalised Terms of Reference for the Total Mobility review (Annex 1). We shared the draft Terms of Reference with the then Minister of Transport Hon Michael Wood in April 2022 [OC220220 *refers*]. Since then, it has been circulated to stakeholders and their feedback has been incorporated into the finalised version.
- One of the key pieces of feedback received by stakeholders was the importance of upholding disabled people's rights. The finalised Terms of Reference includes reference to the United Nations' Convention on the Rights of Persons with Disabilities (UNCRPD). It also notes the review aligns with the New Zealand Disability Strategy and associated Disability Action Plan 2019-2023.
- It is expected that the Total Mobility review will be completed in late 2024.

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Recommendations

We recommend you:

- 1 **agree** to the finalised Terms of Reference for the Total Mobility Review (Annex 1) Yes / No
- 2 **note** the draft Terms of Reference was shared with Total Mobility stakeholders and their feedback has been incorporated into the finalised version
- 3 **note** that the estimated completion date for the review is late 2024



Helen White
Manager Mobility and Safety
 19 / 07 / 2023

Hon David Parker
Minister of Transport
 / /

- Minister's office to complete:**
- Approved Declined
 - Seen by Minister Not seen by Minister
 - Overtaken by events

Comments

Contacts

| Name | Telephone | First contact |
|---|-----------|---------------|
| Anjela Frost, Senior Adviser, Mobility and Safety | s 9(2)(a) | ✓ |
| Helen White, Manager, Mobility and Safety | | |

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TOTAL MOBILITY REVIEW (TERMS OF REFERENCE)

The purpose of the Total Mobility Scheme is to ensure disabled people can participate in their communities in a safe and dignified manner

- 1 The Total Mobility Scheme provides disabled New Zealanders with a 75 percent discount on taxi rides up to a regionally adjusted cap. The funding of this subsidy is made up of:
 - 50 percent through a combination of the National Land Transport Fund (NLTF) and local government's regional rates (60 percent NLTF and 40 percent through local government).
 - 25 funded by the Crown – in December 2022, Cabinet announced a permanent additional 25 percent subsidy for Total Mobility to begin at the end of universal half price fares in line with Community Connect. Budget 2023 included funding to allow for the extension of this permanent additional 25 percent subsidy.
- 2 Eligibility for Total Mobility is targeted at those who are unable to use buses, trains or ferries in a safe and dignified manner because of a physical, intellectual, psychological, sensory or neurological disability. Assistance is offered in the form of subsidised door-to-door transport services wherever providers of Total Mobility operate.
- 3 There is substantial regional variation in the level of the maximum cap for subsidised Total Mobility trips. Currently 50 percent of the total fare is covered, ranging from a maximum fare of \$10-\$80.
- 4 In 2021/22 there were approximately 89,000 Total Mobility cardholders. In 2022, there were approximately 1.6 million subsidised Total Mobility trips made across New Zealand.

The review of Total Mobility is one of the actions the Ministry has committed to in the Disability Action Plan 2019-2023

- 5 Access to transport is a human rights issue. In 2008 New Zealand ratified the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). The UNCRPD guarantees disabled people full participation in society and Article 9 includes accessible transport:
 - *To enable persons with disabilities to live independently and participate fully in all aspects of life, States parties shall take appropriate measures to ensure persons with disabilities access, on an equal basis with others, [...] to transportation, [...], and to other facilities and services open or provided to the public, both in urban and rural areas.*
- 6 The New Zealand Disability Strategy (the Strategy) 2016-2026, and the Disability Action Plan 2019-2023 (the Action Plan), support New Zealand's implementation of the UNCRPD. The vision of the Strategy is for New Zealand to be a non-disabling

society – a place where disabled people have an equal opportunity to achieve their goals and aspirations.

- 7 The Action Plan supports delivery of the Strategy and identifies priority work programmes across government. The review of Total Mobility supports *Outcome 5 – Accessibility* which aims to ensure that disabled people are able to access “all places, services and information with ease and dignity”.
- 8 The Ministry has committed to undertake the review of Total Mobility and implement the Accessible Streets package¹ in the Action Plan. As the Action Plan covers the 2019-2023 period, it is important that the review of Total Mobility get underway to meet our commitments.

The review of Total Mobility aims to improve the effectiveness of the scheme across Aotearoa

- 9 In August 2022, Waka Kotahi NZ Transport Agency published the research report *Transport experiences of disabled people in Aotearoa New Zealand*. This research included an examination of Total Mobility and found that Total Mobility costs time and effort and is sometimes an unreliable or unavailable transport option.
- 10 The Total Mobility review allows for the examination of how key issues with the scheme can be addressed to improve the effectiveness and enhance the wellbeing of disabled people across Aotearoa. Some of the key issues that have been identified to date include:
 - Demand for Total Mobility exceeds the current supply of services
 - Shortage of wheelchair accessible vehicles
 - Cost to user – although this has been partly mitigated by the permanent additional 25 percent discount for Total Mobility announced in December 2022
 - Regional variation in subsidy caps and supply of services
 - Funding mechanisms, including PTAs having difficulties meeting their share of costs within their budgets
- 11 These issues, which are expanded on in the Terms of Reference, prevent Total Mobility from making its full contribution to improving accessibility for disabled people in New Zealand. It is timely to review Total Mobility and identify improvements to ensure that it is fit for purpose.
- 12 The Total Mobility Scheme was last reviewed from 2002 to 2005 with the intention of identifying key barriers in the Scheme and providing recommended actions to enable better access and service (Mackay & Peters, 2005). This review did not result in

¹ Accessible Streets is primarily a collection of rule changes designed to increase the safety and accessibility of our footpaths, shared paths, cycle lanes, cycle paths and roadways. The rules respond to the increasing use of different vehicles on our paths and roadways and aim to support the uptake of active modes of travel.

meaningful improvements in accessibility due to only a small number of the recommendations being implemented (those relating to entitlements).

- 13 There is the need for an updated Total Mobility review to be undertaken given the changes in technologies and society that have occurred since 2005. The Ministry will consider the findings from the 2005 review as part of this Total Mobility review.

The draft Terms of Reference has been shared with stakeholders, and their feedback has been incorporated into a finalised version

- 14 In April 2022, we shared the draft Terms of Reference for the review with the then Minister of Transport Hon Michael Wood and sought his feedback before sharing it with key stakeholders [OC220220 Refers]. Since then, the draft Terms of Reference has been shared with the following stakeholders:

- Disabled People's Organisations (DPO) Coalition
- Office for Disability Issues (Whaikaha – Ministry for Disabled People)
- Age Concern NZ
- Waka Kotahi NZ Transport Agency
- Public transport authorities (PTAs)
- Transport Special Interest Group
- Ministry of Education
- Service operators (including independent operators and the Small Passenger Services Association)
- Payment service providers and existing payment technology providers (e.g. Ridewise platform)

- 15 We received feedback from many of the stakeholders who were involved in the engagement process. Some of the key points of feedback received included:

- Stakeholders were generally supportive of the Terms of Reference.
- The review needs to focus on upholding the human rights of disabled people.
- The review should be underpinned by the principles of Te Tiriti o Waitangi and undertaken in a way that acknowledges and is considerate of Māori concepts of disability and wellbeing.
- The inclusion of an examination of wheelchair accessible vehicles in the scope was strongly supported.
- The importance of considering the environmental impact and sustainability of any possible changes to Total Mobility.

- General support from the disability community for the permanent additional 25 percent discount on Total Mobility fares announced in December 2022.
 - Concerns around funding for Total Mobility and any changes that may result from the review.
- 16 The feedback from stakeholders has been incorporated into the finalised Terms of Reference. The Terms of Reference scope has four key sections:
- The purpose of Total Mobility
 - How the Total Mobility Scheme can be made more accessible for disabled people
 - How aspects of the Total Mobility Scheme's operations can be improved
 - Sustainable funding mechanisms for the Total Mobility Scheme

The Total Mobility review gives effect to New Zealand's commitments under the UNCRPD and the New Zealand Disability Strategy

- 17 One of the key pieces of feedback received from stakeholders on the draft Terms of Reference was the importance of upholding disabled people's human rights. We have included reference to the UNCRPD in the Terms of Reference. It is important that the Total Mobility review gives effect to New Zealand's commitments under the UNCRPD (particularly *Article 9 – Accessibility* outlined above).
- 18 We have also included reference to the New Zealand Disability Strategy and associated Disability Action Plan (outlined above) in the Terms of Reference. This was received well by stakeholders.

Next steps

- 19 Subject to your approval of the finalised Terms of Reference, we anticipate the following timeline for the Total Mobility review:

| Action | Proposed timing |
|---|----------------------------|
| Minister agreement to the draft Terms of Reference for the review | Completed |
| Engage key stakeholders on the draft Terms of Reference, and incorporate feedback into a final Terms of Reference | Completed |
| Provide finalised Terms of Reference for Minister's agreement | 20 July 2023 |
| Commence review, including development of draft discussion papers with stakeholder input | August 2023 – January 2024 |
| Engagement on draft discussion papers | February – May 2024 |
| Summary of feedback and key themes provided to Minister | June – July 2024 |
| Final recommendations and review completed | Late 2024 |

- 20 We will keep you regularly updated through the weekly report of progress of the review, including if there are any changes to expected timeframes.

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ANNEX 1 – FINALISED TERMS OF REFERENCE FOR THE TOTAL MOBILITY REVIEW

Purpose

- 1 The purpose of the Total Mobility Scheme review is to investigate how Total Mobility operates and how it can be improved to create better outcomes for disabled people. The review will primarily explore four key areas:
 - The purpose of Total Mobility
 - How the Total Mobility Scheme can be made more accessible for disabled people
 - How aspects of the Total Mobility Scheme's operations can be improved
 - Sustainable funding mechanisms for the Total Mobility Scheme
- 2 This review aims to ensure the human rights of disabled people are upheld, as outlined in New Zealand's commitments under the United Nations Convention on the Rights of Persons with Disabilities.
- 3 This review will be underpinned by the principles of Te Tiriti o Waitangi and undertaken in a way which acknowledges and is considerate of Māori concepts of disability and wellbeing.

Background

- 4 The Total Mobility Scheme provides subsidised taxi services for people who have difficulty using buses, trains or ferries because of a physical, psychological, sensory or neurological disability. It aims to complement public transport services to ensure people are able to meet their daily needs in a safe and dignified manner, and to enhance community participation.
- 5 A 75 percent discount applies to Total Mobility fares until a maximum subsidy is reached. The maximum subsidy varies between regions and is set by the relevant public transport authority (PTA). The funding of Total Mobility trips is made up of:
 - 50 percent subsidy funded through a combination of the National Land Transport Fund (NLTF) and local government's regional rates (60 percent NLTF funded and 40 percent local council funded)
 - 25 percent subsidy funded by the Crown (this additional subsidy was announced as permanent by Cabinet in December 2022)
 - The remaining 25 percent is funded by the Total Mobility user (and any additional costs above the maximum regionally adjusted cap).
- 6 Total Mobility has other costs, such as funding grants to encourage investment in wheelchair accessible vehicles, which are either funded in a similar co-funding

arrangement, or solely through the NLTF. Trips requiring a wheelchair hoist use also qualify for an additional flat-rate payment to compensate the taxi for the additional loading and assistance time required.

- 7 The Scheme operates in the majority of regions using an electronic card with photo ID, with the remaining regions operating a paper-based trip management system. In 2021/22 there were approximately 89,000 Total Mobility cardholders. In 2022, approximately 1.6 million Total Mobility trips were made across New Zealand.
- 8 This review gives effect to New Zealand's commitments to the United Nations' Convention on the Rights of Persons with Disabilities (the Convention). Of particular importance from a transport perspective is Article 9 of the Convention – Accessibility:
 - *To enable persons with disabilities to live independently and participate fully in all aspects of life, States parties shall take appropriate measures to ensure persons with disabilities access, on an equal basis with others, [...] to transportation, [...], and to other facilities and services open or provided to the public, both in urban and rural areas.*
- 9 The New Zealand Disability Strategy (the Strategy), and the Disability Action Plan 2019-2023 (the Action Plan), support New Zealand's implementation of the Convention. The vision of the Strategy is for New Zealand to be a non-disabling society – a place where disabled people have an equal opportunity to achieve their goals and aspirations.
- 10 The Action Plan aims to deliver on the eight outcomes in the Strategy, including *Outcome 5: Accessibility*. It does this by further advancing the implementation of the Convention through identifying priority work programmes across government. The Ministry's work programme for the Action Plan includes a commitment to oversee a review into Total Mobility.
- 11 Improving accessibility for disabled people is one of the intended outcomes of the New Zealand Disability Strategy (the Strategy), with a goal of enabling disabled people to be able to "get from one place to another easily and safely". The review will provide the Ministry with an opportunity to ensure that Total Mobility is contributing towards the holistic transport needs of disabled people, as intended by the Strategy.
- 12 Reviewing Total Mobility will also support the Enabling Good Lives principles that were developed by the disability community in 2011 with the intent of increasing choice and control for disabled people. The eight principles are based on respect – disabled people and their families should be decision-makers in their own lives and have access to the support required for this.

Organisations involved in the administration of Total Mobility

- 13 **Te Manatū Waka Ministry of Transport** (the Ministry) is the nation's steward of the transport system, and is responsible for providing policy advice to the Government regarding Total Mobility.
- 14 **Waka Kotahi NZ Transport Agency** is responsible for the operational administration of the Scheme, working with regional councils to administer and fund the Scheme.

- 15 **Public transport authorities** administer Total Mobility in their respective regions, and contract and co-fund the Total Mobility Scheme's services as part of their provision of regional public transport services.

Scope of the review

- 16 The review will consider how Total Mobility operates and how it can be improved to remove barriers and achieve better outcomes for disabled people, such as improving access to their communities, social networks, cultural needs, health services, education and employment opportunities.

- 17 To do this, the review will consider the following:

The purpose of Total Mobility:

The purpose of the Scheme

- 18 The review will consider what the purpose of Total Mobility is, including who Total Mobility is meant to serve and how the scheme operates in relation to other forms of transport (such as public transport services and private vehicle use). This will include consideration of the role of caregivers who support others travel.
- 19 The review will examine how the purpose of Total Mobility aligns with the human rights of disabled people under the Convention.
- 20 The review will consider whether the purpose of the Total Mobility Scheme should be to replace, or complement other forms of transport, or whether a hybrid model should be adopted.

Journey purpose

- 21 The review will examine how Total Mobility is used by disabled people, and whether it is set-up in such a way that it can ensure people are able to travel independently and with dignity. As a part of this examination, comparisons will be made with regular public transport and private motor vehicle usage.
- 22 The review will also consider how the transport needs of disabled people have changed, and how they will continue to evolve over time. Subsequently, the review will consider how the delivery of Total Mobility services can reflect that change.

How the Total Mobility Scheme can be more accessible for disabled people:

Eligibility criteria and assessment

- 23 The review will consider the eligibility criteria of Total Mobility to ensure that they are still fit-for-purpose. Any consideration of eligibility will ensure that recommended changes are consistent with the Convention.
- 24 Total Mobility currently offers the same level of support for all Total Mobility users, irrespective of how their disability affects their ability to use other transport options (such as public transport). The review will consider the appropriateness of this and examine ways in which the eligibility criteria and assessment process could maximise the benefits of Total Mobility for those who need it the most.

- 25 The review will consider the assessment process of people applying for the Total Mobility Scheme, whether it is fit-for-purpose, and how it could be improved (including whether this aspect of Total Mobility should be centralised to ensure people across the country are getting the same level of support, and how the costs of assessments are/should be covered).
- 26 The review will determine the possible extent of fraud or misuse of the Scheme by users or operators, the reasons this may occur, and ways to mitigate it.
- 27 The review will also consider any possible funding from other government departments for similar support to ensure alignment and ease of access (such as Ministry of Education, Ministry of Social Development, ACC or DHB funding).

Outreach

- 28 The review will consider the barriers that exist for people who are disabled to take advantage of the Total Mobility Scheme's services. It is important the review identifies what these barriers are and how those barriers could be removed or lessened. A key aim of this would be to improve the scheme's outreach across New Zealand.

Affordability

- 29 The review will consider whether affordability is a significant issue for users of Total Mobility, and whether the cost of services is prohibitive for users and as such, prevents Total Mobility from achieving its objective of giving effect to the Convention. If required, it will explore options for making Total Mobility more affordable. It will also consider how improving affordability would affect demand for Total Mobility services, and how that could be funded.
- 30 The review will investigate and take into account other possible costs faced by Total Mobility users while using the scheme beyond fare costs (such as card fees when paying for taxis and assessment fees).
- 31 The review will also examine any impacts of the introduction of permanent half price fares and the sustainability of this subsidy.
- 32 Any examination of affordability of Total Mobility will also consider affordability issues for public transport authorities and Waka Kotahi NZ Transport Agency.

The supply of Total Mobility services

- 33 The review will examine the supply of Total Mobility services, including the availability of specialist wheelchair accessible vehicles and drivers. If necessary, it will investigate options to increase the supply of services, so that Total Mobility services are reliable, timely and consistently available throughout the day and evening. As a part of this, it should examine alternative models for the delivery of Total Mobility services (including the safety of any alternative models). This would include:

- how to take advantage of new and emerging transport services, such as on-demand public transport and community transport;

- the possibility of and any barriers to incorporating owners of wheelchair accessible vehicles within the disability community into the Total Mobility Scheme as operators.
- 34 The review will consider whether profitability of providing services under the Total Mobility Scheme is an issue for service providers. If necessary, it will explore options for making Total Mobility more attractive for providers to encourage them to operate these services.
- 35 It will also examine how operators are compensated, and alternative models for the ownership and financing of equipment such as wheelchair hoists (see below). The review should identify opportunities and challenges with implementing alternative delivery models.
- 36 Any examination of the supply of services should also consider the Total Mobility Scheme's availability in rural areas and small towns, and possible ways to address the issue of a lack of supply in those areas.
- 37 The review will also consider the environmental impact of services offered to ensure these are sustainable overtime.

How aspects of the Total Mobility Scheme's operations can be improved:

Operator transport services

- 38 The review will consider the provision of wheelchair accessible vehicles. It will consider:
- the appropriate processes to ensure that this specialised equipment is adequately and regularly inspected through the CoF process, maintained, and replaced when necessary. This would ensure that there is a consistent quality "floor" for equipment that is used by all operators within the Total Mobility Scheme.
 - alternative funding arrangements for the provision of equipment, with the aim of increasing the pool of possible operators (who may otherwise be put-off by the equipment's high initial costs as well as expensive ongoing maintenance).
- 39 The review will also consider elements of Total Mobility that relate to the delivery of services by operators. It will examine whether those elements are fit-for-purpose, including:
- operator training and certification (including how this can help to ensure customer safety);
 - the Total Mobility complaints mechanism; and
 - operator requirements, and whether those requirements avoid unnecessary barriers to entry.

Variability of delivery across the country

- 40 There are significant regional variations in how Total Mobility operates. This is because of how it is administered and how funding decisions made by public transport authorities shape regional policies around Total Mobility. The review will consider how the alignment of delivery can be improved, taking into account some scope for regional variation owing to population differences and environments.
- 41 Any alignment of services offered, including the level of financial support provided to the Total Mobility Scheme's users, should be considered in light of the scheme's ongoing sustainability, given the current reliance on local government co-funding.
- 42 The review will consider the ability of disabled people to travel across Aotearoa, and how the operation of different Total Mobility administration requirements in each region may impact on disabled travellers.
- 43 The review will also consider the opportunities that could come from centralising some administrative aspects of Total Mobility, such as its promotion and outreach.

Validity and timeliness of data to represent delivery, investment in and demand for Total Mobility

- 44 Individual councils own the data related to the Total Mobility Scheme. The review will examine how information can be better shared between operators, councils and Waka Kotahi, and how data can be better used for reporting purposes (taking into account privacy).
- 45 The review will examine the suitability of current technology platforms, including whether they are fit for purpose and any opportunities for improvement. It will also investigate possible other technology options that may be available.

Funding mechanisms for the Total Mobility Scheme:

- 46 The review will consider the appropriateness of current funding mechanisms for the Total Mobility Scheme, and if necessary explore possible alternative means of funding the scheme. Part of this process will include considering the sustainability of funding mechanisms to ensure the longevity of any changes to the Total Mobility Scheme that may result from the review.

Approach

- 47 The Ministry of Transport will undertake the review, working with independent contractors who will assist with certain elements of the review.
- 48 The review will be informed by research commissioned by Waka Kotahi NZ Transport Agency, [Transport Experiences of Disabled People in Aotearoa New Zealand](#). This report, published in August 2022, examined the experiences of disabled New Zealanders, including an examination of any barriers that exist for people wanting to use the Total Mobility Scheme. It also involved surveys and workshops with transport providers working in areas related to the provision of Total Mobility.

Engagement with stakeholders

49 The Ministry will engage regularly with Stakeholders throughout the review. These Stakeholders will include:

- The Disabled People’s Organisations Coalition
- The Office of Disability Issues (an office within Whaikaha – Ministry for Disabled People),
- Other Government agencies – such as Waka Kotahi NZ Transport Agency and Ministry of Education
- Age Concern NZ
- Tangata whaikaha Māori and services that support Māori, Iwi and whānau
- Pacifica disability services
- Agencies that undertake Total Mobility assessments
- Caregivers
- Existing technology and payment providers
- Representatives of public transport authorities
- Existing Total Mobility service operators

Governance

50 The Total Mobility review is being led by the Mobility and Safety team at Te Manatū Waka Ministry of Transport, reporting to the DCE System and Regulatory Design.

Key dates and report back

51 The Ministry has developed a timeline for the review which is set out below:

| Action | Proposed timing |
|---|-----------------|
| Minister agreement to the draft Terms of Reference for the review | Completed |
| Engage key stakeholders on the draft Terms of Reference, and incorporate feedback into a final Terms of Reference | Completed |
| Provide finalised Terms of Reference for Minister’s agreement | 20 July 2023 |

| | |
|--|----------------------------|
| Procurement of contractors | August 2023 |
| Development of draft discussion papers with input from stakeholders | August 2023 – January 2024 |
| First draft of discussion papers due | January 2024 |
| Engagement with stakeholders on draft discussion papers | February – May 2024 |
| Summary of feedback prepared and key themes shared with the Minister | June – July 2024 |
| Final recommendations and review completed | Late 2024 |

Note: Over the course of the review the anticipated timeframes may change. Any substantial changes will be communicated to stakeholders.

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Transport Portfolio Weekly Report

Week commencing 18 March 2024

Recipient

HON SIMEON BROWN
MINISTER OF TRANSPORT

Copy the report to Hon Matthew Doocey as
Associate Minister of Transport

Minister's comments:

Review of the Total Mobility Scheme

Reviewing Total Mobility is one of the actions the Ministry has committed to under the Disability Action Plan 2019-2023. This scheme provides subsidised taxi services for people who have difficulty using buses, trains, or ferries because of a physical, psychological, sensory, or neurological disability. It has not been reviewed since 2005.

The terms of reference set out the proposed approach and timeline, with public engagement planned for February to May 2024 and the review completed in late 2024. ^{s 9(2)(f)(iv)}

^P We will provide you with a briefing in April that sets out key initial findings, content for engagement, and a timeline for completing the review. We do not see any risk to completing the review in 2024.

There is a high level of interest from the disability sector, and accordingly we want to ensure that the consultation process is well framed and managed.



1 May 2024

OC240432

Hon Simeon Brown
Minister of Transport

Action required by:
Friday, 10 May 2024

TOTAL MOBILITY SCHEME REVIEW - UPDATE

Purpose

Update you on the review of the Total Mobility scheme **s 9(2)(f)(iv)**

Key points

- The Total Mobility scheme (TM) is a government-subsidised transport scheme. It helps disabled people to get to where they need to go, when using buses, trains or ferries is not possible because of a disability. Eligible people can access subsidised taxis, and in some cases other forms of transport.
- The Ministry of Transport is reviewing this scheme with the intention of identifying improvements in how it is accessed and operates. The previous Government committed to do this review in the Disability Action Plan 2019–2023. It began in September 2023 and is scheduled to be completed by the end of this year.
- There is a high degree of interest among disabled people's organisations, users, and providers in this review.
- To date, the review has mostly drawn on research on the transport experiences of disabled people in New Zealand. The review is also identifying challenges that TM users and providers have with the current scheme, and opportunities for improvements. We are now assessing the larger policy issues that need to be addressed.
- In June 2024, we will provide you with a briefing on the key policy issues and options to improve the scheme, along with a draft discussion document for public engagement.

- **s 9(2)(f)(iv)**

Recommendations

We recommend you:

- 1 **refer** this briefing to the Minister of Disability Issues, Hon Louise Upston, to inform her of the Total Mobility scheme review. Yes / No

Siobhan Routledge

Siobhan Routledge
Acting DCE, Policy Group

1 / 5 / 2024

Hon Simeon Brown
Minister of Transport

..... / /

- Minister's office to complete:
- Approved
 - Declined
 - Seen by Minister
 - Not seen by Minister
 - Overtaken by events

Comments

Contacts

| Name | Telephone | First contact |
|--|-----------|---------------|
| Jessica Ranger, Manager, Urban Development and Public Transport | s 9(2)(a) | ✓ |
| Whitney Adam, Senior Advisor, Urban Development and Public Transport | | |

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TOTAL MOBILITY SCHEME REVIEW - UPDATE

We are reviewing the Total Mobility scheme to identify improvements

- 1 The Total Mobility (TM) scheme provides subsidised door-to-door transport services (such as approved taxi services) to eligible people with long-term impairments. These services enable them to meet their daily needs and participate in society.
- 2 The TM scheme is managed and supported by regional councils, with support and co-funding from central government.
- 3 In November 2019, the previous Government committed to review the TM scheme. This was an action in the Disability Action Plan 2019–2023.
- 4 The previous Minister of Transport agreed to the Terms of Reference for the TM scheme review in July 2023 (attached as Annex 1), covering four key areas:
 - the purpose of TM
 - how TM can be more accessible for disabled people
 - how aspects of TM's operations can be improved
 - funding mechanisms for TM.
- 5 The Terms of Reference were developed in consultation with key TM stakeholders, particularly the Disabled Peoples Organisations Coalition (**DPO Coalition**). This coalition consists of members from disabled people's organisations.¹ There is a high level of interest among these organisations in the TM review.
- 6 The Ministry is leading the review with support from a consultant. We have updated the Ministry of Disabled People – Whaikaha regularly on progress with the review as part of Disability Action Plan reporting. Following the announcement of an independent review into disability support system funding on 30 April 2024, we will engage with the Ministry of Disabled People – Whaikaha on any potential interactions between the two reviews.

The review builds on research and engagement with people in the disabled community

- 7 The review has been informed by recent research commissioned by the NZ Transport Agency (**NZTA**) on the transport experiences of disabled people in New Zealand.² It has also been informed by a review of existing reports on the TM scheme and similar schemes around the world.

¹ These organisations include Association of Blind Citizens New Zealand (Blind Citizens NZ), Balance Aotearoa, Deaf Aotearoa, Disabled Persons Assembly NZ, Muscular Dystrophy Association of New Zealand Inc and People First New Zealand
Ngā Tāngata Tuatahi.

² Research Report 690 Transport experiences of disabled people in Aotearoa New Zealand (2022), available at <https://www.nzta.govt.nz/resources/research/reports/690/>

- 8 This research has been supplemented by early engagement with the DPO Coalition, and with staff in some Public Transport Authorities (**PTAs**).
- 9 Many TM scheme customers value the scheme highly. It is generally regarded as a useful, appreciated scheme that helps a lot of people access what they need in an affordable, dignified, and convenient way.
- 10 The review is also identifying challenges that TM users and providers have with the current scheme, and opportunities for improvements.

The next step is to analyse key policy issues

- 11 Most of the challenges and opportunities that people have highlighted with TM focus on how the current scheme operates. This includes issues with how the scheme is advertised, costs associated with eligibility assessments, and the process for booking trips. We are now assessing the larger policy issues that need to be addressed in the review, which are not just limited to operational issues.

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- 13 We will brief you on key issues, and potential options for improvements to TM scheme in the week ending 7 June 2024. This will include a draft discussion document to consider.

We will be seeking public feedback on potential options for improvements

- 14 The purpose of the discussion document is to highlight issues we are aware of with the current TM scheme, to suggest potential options for improvement, and to gather public feedback to inform the review.
- 15 Following your consideration of the draft discussion document, we will prepare a Cabinet Paper for you to seek Cabinet agreement to seek public feedback on the discussion document.

We remain on track to complete the review this year

- 16 The Terms of Reference for the review envisaged us completing a draft discussion document by mid-2024, engaging with stakeholders by mid-2024, and completing the review by the end of 2024.
- 17 We are now working to the following timeframes, while retaining the end of 2024 completion date:

| | |
|---|---|
| Brief you on key policy issues and provide you with a draft discussion document | 5 June 2024 |
| Provide you with a draft Cabinet Paper, seeking agreement for public engagement | 19 June 2024 |
| Cabinet Committee consideration | Week ending 2 August 2024 |
| Cabinet consideration | 5 August 2024 |
| Public engagement | 12 August to 20 September 2024 |
| Analysing public feedback | 23 September to early October 2024 |
| Final policy analysis | Early October to mid-November 2024 |
| Brief you on recommendations | 13 November 2024 |

- 18 We will inform the disability sector and other key stakeholders of the new timeframes.
- 19 A consultant was initially commissioned to write the discussion document, run the public engagement on behalf of the Ministry, and to produce a recommendations report based on the outcomes of the engagement. We have now decided to complete the discussion document and the rest of this process in-house. A key driver for doing this is the need to address material policy issues relating to TM. It is appropriate for these issues to be worked on by the relevant policy agency in consultation with other agencies.

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Risks

- 29 There is a high degree of interest among disabled people's organisations and TM users in this review. Given the current fiscal constraints, some of these people may be concerned about current and future levels of Government support for the TM scheme and how this could impact on disabled people. There may also be expectations the review will result in an increase in Government funding.
- 30 We have been seeking to assure stakeholders in the disability sector the review is intended to identify opportunities to improve the scheme. We are also making it clear that the review is not primarily focused on funding levels but will help to inform any future decisions about future TM funding.
- 31 The disability community may be concerned public engagement on the review is happening later than initially planned. We remain on track to meet the end of year completion date for the review. The additional time for policy work enables the disability community and other stakeholders to provide feedback on more detailed options to improve the scheme. This will enable any future changes to be made more quickly as we will have already engaged on them.

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Next steps

- 33 As noted above, we will provide you with a briefing of the key policy issues associated with the TM review and a draft discussion document for your consideration in the week of 7 June.
- 34 We will then incorporate your feedback on the discussion document and, if you agree, provide you with a Cabinet paper seeking agreement to begin wider public engagement.
- 35 In the interim, we will update the disability sector and other key stakeholders on the new timelines for the review.
- 36 We also recommend that you share this briefing with the Minister of Disability Issues.

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ANNEX 1

Current Terms of Reference for the review of the Total Mobility Scheme

Purpose

- 1 The purpose of the Total Mobility Scheme review is to investigate how Total Mobility operates and how it can be improved to create better outcomes for disabled people. The review will primarily explore four key areas:
 - The purpose of Total Mobility
 - How the Total Mobility Scheme can be made more accessible for disabled people
 - How aspects of the Total Mobility Scheme's operations can be improved
 - Sustainable funding mechanisms for the Total Mobility Scheme
- 2 This review aims to ensure the human rights of disabled people are upheld, as outlined in New Zealand's commitments under the United Nations Convention on the Rights of Persons with Disabilities.
- 3 This review will be underpinned by the principles of Te Tiriti o Waitangi and undertaken in a way which acknowledges and is considerate of Māori concepts of disability and wellbeing.

Background

- 4 The Total Mobility Scheme provides subsidised taxi services for people who have difficulty using buses, trains or ferries because of a physical, psychological, sensory or neurological disability. It aims to complement public transport services to ensure people are able to meet their daily needs in a safe and dignified manner, and to enhance community participation.
- 5 A 75 percent discount applies to Total Mobility fares until a maximum subsidy is reached. The maximum subsidy varies between regions and is set by the relevant public transport authority (PTA). The funding of Total Mobility trips is made up of:
 - 50 percent subsidy funded through a combination of the National Land Transport Fund (NLTF) and local government's regional rates (60 percent NLTF funded and 40 percent local council funded)
 - 25 percent subsidy funded by the Crown (this additional subsidy was announced as permanent by Cabinet in December 2022)
 - The remaining 25 percent is funded by the Total Mobility user (and any additional costs above the maximum regionally adjusted cap).

- 6 Total Mobility has other costs, such as funding grants to encourage investment in wheelchair accessible vehicles, which are either funded in a similar co-funding arrangement, or solely through the NLTF. Trips requiring a wheelchair hoist use also qualify for an additional flat-rate payment to compensate the taxi for the additional loading and assistance time required.
- 7 The Scheme operates in the majority of regions using an electronic card with photo ID, with the remaining regions operating a paper-based trip management system. In 2021/22 there were approximately 89,000 Total Mobility cardholders. In 2022, approximately 1.6 million Total Mobility trips were made across New Zealand.
- 8 This review gives effect to New Zealand's commitments to the United Nations' Convention on the Rights of Persons with Disabilities (the Convention). Of particular importance from a transport perspective is Article 9 of the Convention – Accessibility.
- *To enable persons with disabilities to live independently and participate fully in all aspects of life, States parties shall take appropriate measures to ensure persons with disabilities access, on an equal basis with others, [...] to transportation, [...], and to other facilities and services open or provided to the public, both in urban and rural areas.*
- 9 The New Zealand Disability Strategy (the Strategy), and the Disability Action Plan 2019-2023 (the Action Plan), support New Zealand's implementation of the Convention. The vision of the Strategy is for New Zealand to be a non-disabling society – a place where disabled people have an equal opportunity to achieve their goals and aspirations.
- 10 The Action Plan aims to deliver on the eight outcomes in the Strategy, including *Outcome 5: Accessibility*. It does this by further advancing the implementation of the Convention through identifying priority work programmes across government. The Ministry's work programme for the Action Plan includes a commitment to oversee a review into Total Mobility.
- 11 Improving accessibility for disabled people is one of the intended outcomes of the New Zealand Disability Strategy (the Strategy), with a goal of enabling disabled people to be able to "get from one place to another easily and safely". The review will provide the Ministry with an opportunity to ensure that Total Mobility is contributing towards the holistic transport needs of disabled people, as intended by the Strategy.
- 12 Reviewing Total Mobility will also support the Enabling Good Lives principles that were developed by the disability community in 2011 with the intent of increasing choice and control for disabled people. The eight principles are based on respect – disabled people and their families should be decision-makers in their own lives and have access to the support required for this.

Organisations involved in the administration of Total Mobility

- 13 **Te Manatū Waka Ministry of Transport** (the Ministry) is the nation's steward of the transport system, and is responsible for providing policy advice to the Government regarding Total Mobility.
- 14 **Waka Kotahi NZ Transport Agency** is responsible for the operational administration of the Scheme, working with regional councils to administer and fund the Scheme.

- 15 **Public transport authorities** administer Total Mobility in their respective regions, and contract and co-fund the Total Mobility Scheme's services as part of their provision of regional public transport services.

Scope of the review

- 16 The review will consider how Total Mobility operates and how it can be improved to remove barriers and achieve better outcomes for disabled people, such as improving access to their communities, social networks, cultural needs, health services, education and employment opportunities.

- 17 To do this, the review will consider the following:

The purpose of Total Mobility:

The purpose of the Scheme

- 18 The review will consider what the purpose of Total Mobility is, including who Total Mobility is meant to serve and how the scheme operates in relation to other forms of transport (such as public transport services and private vehicle use). This will include consideration of the role of caregivers who support others travel.
- 19 The review will examine how the purpose of Total Mobility aligns with the human rights of disabled people under the Convention.
- 20 The review will consider whether the purpose of the Total Mobility Scheme should be to replace, or complement other forms of transport, or whether a hybrid model should be adopted.

Journey purpose

- 21 The review will examine how Total Mobility is used by disabled people, and whether it is set-up in such a way that it can ensure people are able to travel independently and with dignity. As a part of this examination, comparisons will be made with regular public transport and private motor vehicle usage.
- 22 The review will also consider how the transport needs of disabled people have changed, and how they will continue to evolve over time. Subsequently, the review will consider how the delivery of Total Mobility services can reflect that change.

How the Total Mobility Scheme can be more accessible for disabled people:

Eligibility criteria and assessment

- 23 The review will consider the eligibility criteria of Total Mobility to ensure that they are still fit-for-purpose. Any consideration of eligibility will ensure that recommended changes are consistent with the Convention.
- 24 Total Mobility currently offers the same level of support for all Total Mobility users, irrespective of how their disability affects their ability to use other transport options (such as public transport). The review will consider the appropriateness of this and examine ways in which the eligibility criteria and assessment process could maximise the benefits of Total Mobility for those who need it the most.

- 25 The review will consider the assessment process of people applying for the Total Mobility Scheme, whether it is fit-for-purpose, and how it could be improved (including whether this aspect of Total Mobility should be centralised to ensure people across the country are getting the same level of support, and how the costs of assessments are/should be covered).
- 26 The review will determine the possible extent of fraud or misuse of the Scheme by users or operators, the reasons this may occur, and ways to mitigate it.
- 27 The review will also consider any possible funding from other government departments for similar support to ensure alignment and ease of access (such as Ministry of Education, Ministry of Social Development, ACC or DHB funding).

Outreach

- 28 The review will consider the barriers that exist for people who are disabled to take advantage of the Total Mobility Scheme's services. It is important the review identifies what these barriers are and how those barriers could be removed or lessened. A key aim of this would be to improve the scheme's outreach across New Zealand.

Affordability

- 29 The review will consider whether affordability is a significant issue for users of Total Mobility, and whether the cost of services is prohibitive for users and as such, prevents Total Mobility from achieving its objective of giving effect to the Convention. If required, it will explore options for making Total Mobility more affordable. It will also consider how improving affordability would affect demand for Total Mobility services, and how that could be funded.
- 30 The review will investigate and take into account other possible costs faced by Total Mobility users while using the scheme beyond fare costs (such as card fees when paying for taxis and assessment fees).
- 31 The review will also examine any impacts of the introduction of permanent half price fares and the sustainability of this subsidy.
- 32 Any examination of affordability of Total Mobility will also consider affordability issues for public transport authorities and Waka Kotahi NZ Transport Agency.

The supply of Total Mobility services

- 33 The review will examine the supply of Total Mobility services, including the availability of specialist wheelchair accessible vehicles and drivers. If necessary, it will investigate options to increase the supply of services, so that Total Mobility services are reliable, timely and consistently available throughout the day and evening. As a part of this, it should examine alternative models for the delivery of Total Mobility services (including the safety of any alternative models). This would include:

- how to take advantage of new and emerging transport services, such as on-demand public transport and community transport;

- the possibility of and any barriers to incorporating owners of wheelchair accessible vehicles within the disability community into the Total Mobility Scheme as operators.
- 34 The review will consider whether profitability of providing services under the Total Mobility Scheme is an issue for service providers. If necessary, it will explore options for making Total Mobility more attractive for providers to encourage them to operate these services.
- 35 It will also examine how operators are compensated, and alternative models for the ownership and financing of equipment such as wheelchair hoists (see below). The review should identify opportunities and challenges with implementing alternative delivery models.
- 36 Any examination of the supply of services should also consider the Total Mobility Scheme's availability in rural areas and small towns, and possible ways to address the issue of a lack of supply in those areas.
- 37 The review will also consider the environmental impact of services offered to ensure these are sustainable overtime.

How aspects of the Total Mobility Scheme's operations can be improved:

Operator transport services

- 38 The review will consider the provision of wheelchair accessible vehicles. It will consider:
- the appropriate processes to ensure that this specialised equipment is adequately and regularly inspected through the CoF process, maintained, and replaced when necessary. This would ensure that there is a consistent quality "floor" for equipment that is used by all operators within the Total Mobility Scheme.
 - alternative funding arrangements for the provision of equipment, with the aim of increasing the pool of possible operators (who may otherwise be put-off by the equipment's high initial costs as well as expensive ongoing maintenance).
- 39 The review will also consider elements of Total Mobility that relate to the delivery of services by operators. It will examine whether those elements are fit-for-purpose, including:
- operator training and certification (including how this can help to ensure customer safety);
 - the Total Mobility complaints mechanism; and
 - operator requirements, and whether those requirements avoid unnecessary barriers to entry.

Variability of delivery across the country

- 40 There are significant regional variations in how Total Mobility operates. This is because of how it is administered and how funding decisions made by public transport authorities shape regional policies around Total Mobility. The review will consider how the alignment of delivery can be improved, taking into account some scope for regional variation owing to population differences and environments.
- 41 Any alignment of services offered, including the level of financial support provided to the Total Mobility Scheme's users, should be considered in light of the scheme's ongoing sustainability, given the current reliance on local government co-funding.
- 42 The review will consider the ability of disabled people to travel across Aotearoa, and how the operation of different Total Mobility administration requirements in each region may impact on disabled travellers.
- 43 The review will also consider the opportunities that could come from centralising some administrative aspects of Total Mobility, such as its promotion and outreach.

Validity and timeliness of data to represent delivery, investment in and demand for Total Mobility

- 44 Individual councils own the data related to the Total Mobility Scheme. The review will examine how information can be better shared between operators, councils and Waka Kotahi, and how data can be better used for reporting purposes (taking into account privacy).
- 45 The review will examine the suitability of current technology platforms, including whether they are fit for purpose and any opportunities for improvement. It will also investigate possible other technology options that may be available.

Funding mechanisms for the Total Mobility Scheme:

- 46 The review will consider the appropriateness of current funding mechanisms for the Total Mobility Scheme, and if necessary explore possible alternative means of funding the scheme. Part of this process will include considering the sustainability of funding mechanisms to ensure the longevity of any changes to the Total Mobility Scheme that may result from the review.

Approach

- 47 The Ministry of Transport will undertake the review, working with independent contractors who will assist with certain elements of the review.
- 48 The review will be informed by research commissioned by Waka Kotahi NZ Transport Agency, [Transport Experiences of Disabled People in Aotearoa New Zealand](#). This report, published in August 2022, examined the experiences of disabled New Zealanders, including an examination of any barriers that exist for people wanting to use the Total Mobility Scheme. It also involved surveys and workshops with transport providers working in areas related to the provision of Total Mobility.

Engagement with stakeholders

49 The Ministry will engage regularly with Stakeholders throughout the review. These Stakeholders will include:

- The Disabled People’s Organisations Coalition
- The Office of Disability Issues (an office within Whaikaha – Ministry for Disabled People),
- Other Government agencies – such as Waka Kotahi NZ Transport Agency and Ministry of Education
- Age Concern NZ
- Tangata whaikaha Māori and services that support Māori, Iwi and whānau
- Pacifica disability services
- Agencies that undertake Total Mobility assessments
- Caregivers
- Existing technology and payment providers
- Representatives of public transport authorities
- Existing Total Mobility service operators

Governance

50 The Total Mobility review is being led by the Mobility and Safety team at Te Manatū Waka Ministry of Transport, reporting to the DCE System and Regulatory Design.

Key dates and report back

51 The Ministry has developed a timeline for the review which is set out below:

| Action | Proposed timing |
|---|-----------------|
| Minister agreement to the draft Terms of Reference for the review | Completed |
| Engage key stakeholders on the draft Terms of Reference, and incorporate feedback into a final Terms of Reference | Completed |
| Provide finalised Terms of Reference for Minister’s agreement | 20 July 2023 |
| Procurement of contractors | August 2023 |

| | |
|--|----------------------------|
| Development of draft discussion papers with input from stakeholders | August 2023 – January 2024 |
| First draft of discussion papers due | January 2024 |
| Engagement with stakeholders on draft discussion papers | February – May 2024 |
| Summary of feedback prepared and key themes shared with the Minister | June – July 2024 |
| Final recommendations and review completed | Late 2024 |

Note: Over the course of the review the anticipated timeframes may change. Any substantial changes will be communicated to stakeholders.

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10 May 2024

OC240431

Hon Simeon Brown
Minister of Transport

MEETING WITH THE SMALL PASSENGER SERVICE ASSOCIATION - 14 MAY 2024

Snapshot

You are attending a meeting with the Small Passenger Service Association (SPSA) to discuss its request to **Out of Scope** and to increase funding for operators participating in the Total Mobility scheme.

| | |
|----------------------------|---|
| Time and date | 10.00-10.30am, 14 May 2024 |
| Venue | Parliament EW5.1. |
| Attendees | Warren Quirke, Executive Director, Small Passenger Service Association Grant Scannell, President, Small Passenger Service Association James Hart, Vice-President, Small Passenger Service Association |
| Officials attending | TBC |
| Agenda | The SPSA wishes to discuss: Out of Scope <ul style="list-style-type: none"> funding availability for wheelchair hoists and ramps via the Total Mobility scheme. |
| Talking points | Attached in Annex 1 |

Contacts

| Name | Telephone | First contact |
|---|-----------|---------------|
| Jessica Ranger, Manager, Urban Development and Public Transport | s 9(2)(a) | ✓ |
| Dmitry Mitenkoff, Adviser, Urban Development and Public Transport | | |

The ability to provide services for people with mobility challenges via Total Mobility

- 23 SPSA considers the transport industry is facing challenges in its ability to provide adequate service for people with mobility challenges. While the number of passengers requiring this type of transport service is increasing, the number of operators offering the service is in decline.
- 24 The Total Mobility scheme provides subsidised door-to-door transport services (such as approved taxi services) to eligible people with long-term impairments. These services enable them to meet their daily needs and participate in society.
- 25 NZTA provides National Land Transport Fund (NLTF) funding to public transport authorities (PTAs) for purchasing and installing wheelchair hoists or ramps for Total Mobility services. The NLTF covers 60% of the cost with PTAs funding the other 40%.
- 26 SPSA considers NZTA needs to take more responsibility for how PTAs allocate funding. It considers the subsidy for hoist up-lifts should be increased to a level that encourages operators to invest in the service.
- 27 NZTA notes the funding allocated to wheelchair hoists purchase and installation has not been fully claimed by PTAs in recent financial years. The percentage of available funds claimed has ranged between 18% and 48% over the last five financial years.

¹ <http://www.nzta.govt.nz/resources/rules/land-transport-rule-operator-licensing-2017/operator-licensing-2017/#33>

- 28 This suggests funding availability does not appear to be the key barrier for operators to undertake hoist installations. Other issues include:
- To install a hoist in a vehicle, the operator must have already invested in a large van, rather than a standard sedan car. This is a significant investment for a taxi operator, and it holds a risk of being under-utilised outside of Total Mobility trips, and therefore not providing value for money for the operator.
 - The demand for hoist related trips appears to be declining within the scheme, so once again this creates a risk for operators to invest in installation.
- 29 There is also provision for a payment at a flat rate of \$10 for each trip taken by a Total Mobility scheme member using a wheelchair hoist or ramp to the contracted Total Mobility transport operator in addition to the fare. This fee has not changed since 2004 and SPSA considers it insufficient.
- 30 The Ministry is currently undertaking a review of the Total Mobility scheme, and this provides an opportunity to look at funding levels across the scheme. The review is covering four key areas:
- the purpose of Total Mobility
 - how Total Mobility can be more accessible for disabled people
 - how aspects of Total Mobility's operations can be improved
 - funding mechanisms for Total Mobility.
- 31 The intention is for the review to be completed by the end of 2024.
- 32 There will be public engagement later in 2024 as part of the review. This will be an opportunity for SPSA and other providers to provide feedback on improvements to the scheme.

Transport Portfolio Weekly Report

As at Wednesday 15 May 2024

Recipient

HON SIMEON BROWN
MINISTER OF TRANSPORT

Copy the report to Hon Matthew Doocey as
Associate Minister of Transport

Minister's comments:

Total Mobility Review

You have requested more information on the Terms of Reference (ToR) for the Total Mobility review (the review). Draft ToR were developed by the Ministry in 2022 and shared with key stakeholders, including the Disabled People's Organisations Coalition, public transport authorities (PTAs) and service operators. Their feedback was incorporated into the finalised version agreed to by the then Minister of Transport in July 2023. The ToR were not considered by Cabinet.

The ToR are extensive and include 29 detailed elements to consider. Some of these elements focus on the design of the scheme (e.g. the purpose) while others are very operational (e.g. operator training and certification processes). We have been addressing this, where possible, by grouping similar issues together and relying on previous research that provides insights into these issues. s 9(2)(f)(iv)

The key benefits of revising the ToR would be enabling us to focus on the most important policy and operational issues and give more priority to issues relevant to the current Government. We have also identified gaps around innovation and value for money and these could be included in revised ToR. The same process could be followed as for developing the current ToR (i.e. a draft version of the revised ToR sent out for feedback).

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We will provide advice on updating the ToR as part of our next briefing on the Total Mobility review. This briefing is due to you in the week ending 7 June 2024.



7 June 2024

OC240554

Hon Simeon Brown
Minister of Transport

Action required by:
Friday, 14 June 2024

TOTAL MOBILITY SCHEME REVIEW - NEXT STEPS

Purpose

Update you on progress with reviewing the Total Mobility scheme, and to seek your agreement to revise the Terms of Reference for this review and to share them with targeted stakeholders.

Key points

- We provided you with an initial update on progress with the review of the Total Mobility review in April 2024 (OC240432 refers). We subsequently advised you via the Weekly Report that the review's Terms of Reference, which were set by the previous Minister of Transport, could be revised to improve the focus and usefulness of the review.
- Since our last briefing, we have continued refining the key policy issues that need addressing through the review. While these mostly align with the current Terms of Reference, there are some important gaps that would benefit from a sharper focus. These relate to value for money (so that the scheme benefits the people who need it most), innovation, alignment with other government schemes for disabled people, and funding sustainability.

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- We have attached a draft refocused Terms of Reference for your consideration and a revised timeline for completing the review. The draft Terms of Reference maintains the previous review's purpose and the four key areas, but focuses on identifying the most important improvements that could be addressed in the near-term. We recommend sharing the draft Terms of Reference with targeted stakeholders before

finalising them, which would enable us to hear stakeholder feedback and work through potential concerns.

- There is considerable interest in the review from the disability sector, and a strong desire to see it completed as soon as possible. There is likely to be some concern about the Government's ongoing commitment to Total Mobility if the Terms of Reference are refocused. We intend to manage this through proactive and clear communication, and by emphasising the Government is not restarting the review but building on the work already done.

Recommendations

We recommend you:

- | | | |
|---|--|----------|
| 1 | agree to the refocused Terms of Reference for the Total Mobility review | Yes / No |
| 2 | agree to the revised timeline for the Total Mobility review | Yes / No |
| 3 | agree to the Ministry sharing the refocused Terms of Reference with targeted stakeholders for feedback before finalising | Yes / No |

Suathuolgo

Siobhan Routledge
Acting DCE, Policy Group
 7 / 6 / 24

Hon Simeon Brown
Minister of Transport
 / 05 / 24

- Minister's office to complete:**
- | | |
|--|---|
| <input type="checkbox"/> Approved | <input type="checkbox"/> Declined |
| <input type="checkbox"/> Seen by Minister | <input type="checkbox"/> Not seen by Minister |
| <input type="checkbox"/> Overtaken by events | |

Comments

Contacts

| Name | Telephone | First contact |
|--|-----------|---------------|
| Jessica Ranger, Manager, Urban Development and Public Transport | s 9(2)(a) | ✓ |
| Whitney Adam, Senior Advisor, Urban Development and Public Transport | | |

TOTAL MOBILITY SCHEME REVIEW - NEXT STEPS

The purpose of Total Mobility is to ensure disabled people can meet their daily needs and to enhance their community participation

- 1 Funded in partnership by central and local government, Total Mobility assists eligible people with long-term impairments to access subsidised door-to-door transport services wherever Total Mobility providers operate. Its origins date back to 1981.
- 2 Total Mobility is managed and operated by regional councils and Auckland Transport, within parameters set by central government. There are substantial regional variations in how the scheme is operated. Eligible Total Mobility users currently receive a 75 per cent subsidy on transport fares up to a maximum fare that is set by each region. This cap ranges from a maximum fare of \$7.50 in parts of Rangitikei to \$80 in Auckland and Wellington.

Total Mobility was last reviewed almost twenty years ago

- 3 The Total Mobility Scheme was last reviewed from 2002 to 2005 with the intention of identifying key barriers in the scheme and recommending actions to enable better access and services. This review did not result in meaningful improvements as only a small number of the recommendations were implemented.
- 4 It is timely to look at Total Mobility for several reasons:
 - 4.1 substantial technological and societal changes have occurred since 2005
 - 4.2 New Zealand ratified the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) in 2008, which guarantees disabled people full participation in society and Article 9 includes accessible transport
 - 4.3 research published by NZTA in 2022 found Total Mobility is highly valued by users, but is sometimes an unreliable or unavailable transport option.¹
- 5 The Ministry committed to review the scheme as an action in the Disability Action Plan 2019–2023. The previous Minister of Transport agreed to Terms of Reference for this review in July 2023.
- 6 The purpose of the review is to *‘investigate how this scheme operates and how it can be improved to create better outcomes for disabled people’*. The scope covers four main areas:
 - the purpose of Total Mobility
 - how Total Mobility can be more accessible for disabled people
 - how aspects of Total Mobility’s operations can be improved
 - funding mechanisms for Total Mobility.

¹ <https://www.nzta.govt.nz/assets/resources/research/reports/690/690-Transport-experiences-of-disabled-people-in-Aotearoa-New-Zealand.pdf>

- 7 In the 13 May 2024 Weekly Report, we noted the Terms of Reference could be updated to sharpen the focus on the key policy issues and to give more priority to issues relevant to the Government.

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- 9 While most of these key policy issues align with the current Terms of Reference, there are some important gaps. This includes value for money (so that the scheme benefits the people who need it most), supporting innovation, alignment with other government schemes for disabled people, and funding sustainability.

The funding situation for Total Mobility is becoming more complex

Total Mobility is funded via a combination of central and local government funding

- 10 As noted above, Total Mobility provides eligible people with a 75 percent discount on taxi rides up to a regionally adjusted cap. The 75 percent discount is made up of two separate portions:
- 10.1 50 percent of each fare is subsidised through a combination of the National Land Transport Fund (NLTF) and local government's regional rates. Of this 50 percent, 60 percent comes from the NLTF and 40 percent via local share.
 - 10.2 25 percent of each fare is subsidised by the Crown via the Community Connect package, which is currently funded through Budget 2024/25 to 2026/27 and outyears.
- 11 The NLTF funds grants for vehicle operators to cover 60 percent of the cost to install wheelchair hoists or ramps. This increases the number of accessible vehicles for the scheme. It also provides a \$10 fee every time the hoist is used to help compensate the driver for the additional time taken to load and unload the vehicle and any assistance required.
- 12 The total amount of funding for Total Mobility for the 2023/24 financial year provided from central government was \$21.7 million via the NLTF and \$12 million via Community Connect. The local share for the 2023/24 financial year was \$12 million.

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s 9(2)(f)(iv)

Whaikaha has also made recent clarifications to how it funds disability support services that are likely to shift demand from services it previously funded into Total Mobility

- 22 Whaikaha provides government disability support funding to make disabled people's lives easier and/or better. Disabled people can make choices about how they use their funding, and this is referred to as 'flexible funding'. Purchasing Rules inform what people can claim for, guided by four criteria that must be met to use funding to help buy a disability support.
- 23 In March 2024, Whaikaha made urgent changes to its Purchasing Rules to address shortfalls in disability support funding. Clarifications to the Purchasing Rules were published in April 2024, one of which allowed that *"ride and driver services can be used to support a disabled person to access services or engage with the community, where this is a reasonable and cost-effective option"*.

s 9(2)(f)(iv)

s 9(2)(f)(iv)

Revising the review's Terms of Reference would support a more focused approach

- 29 To support the refocused scope and approach, we recommend revising the Terms of Reference for the review. We have attached a draft at Annex 1 for your consideration.
- 30 The draft of the refocused Terms of Reference builds off the work already done. It maintains the current purpose of the review and the four main areas that it covers. The key difference is that it addresses the important gaps we identified as part of our work on the key policy issues, and better reflects the changing context for the review (i.e. increased demand and costs, and the independent review of disability support funding).
- 31 There is a risk that some stakeholders may perceive revising the Terms of Reference as delaying the current review or creating in effect a whole new review. We can manage this risk through proactive and clear communication, and by emphasising that the review is being refocused (not restarted) and that the purpose remains the same.
- 32 If you support this approach, we recommend sharing the draft refocused Terms of Reference with targeted stakeholders before finalising them. This would enable us to hear stakeholder feedback and to work through potential concerns.

- 33 The stakeholders who we engaged with on the original Terms of Reference are NZTA, PTAs, Total Mobility providers, and the Disabled People’s Organisations Coalition.

We can complete the review by early 2025

- 34 The current Terms of Reference set out a timeline for completing the review by late 2024, with the following milestones:

Table 1 Milestones in the current Terms of Reference

| Action | Timing |
|---|----------------------------|
| Development of draft discussion papers with input from stakeholders | August 2023 – January 2024 |
| First draft of discussion papers due | January 2024 |
| Engagement with stakeholders on draft discussion papers | February – May 2024 |
| Summary of feedback prepared and key themes shared with the Minister of Transport | June – July 2024 |
| Final recommendations and review completed | Late 2024 |

- 35 The Terms of Reference also state that *“the anticipated timeframes may change throughout the course of the scheme review and any substantial changes will be communicated to stakeholders”*.

- 36 We are currently behind schedule with public engagement yet to get underway. Factors that have contributed to this include the emerging issues with the funding environment, the need to undertake more substantive work on the key policy issues than anticipated, and the need to transition leadership of the work from a consultant to internal resources.

- 37 Therefore, we recommend updating the timeframe for the review as part of revising the Terms of Reference. This will enable us to clearly communicate to stakeholders when public engagement will commence.

- 38 Table 2 outlines our proposed updated timeline for the review, subject to your agreement. This timeline will still enable us to meet the initial deadline for completing the review by the end of 2024.

Table 2 Proposed timeline for the Total Mobility review

| Action | Proposed timing |
|---|------------------------------|
| Provide an update on proposed approach for engaging on Terms of Reference in Weekly Report | Week commencing 17 June 2024 |
| Share refocused Terms of Reference and revised timeline for feedback with targeted stakeholders | Week commencing 24 June 2024 |
| Final Terms of Reference for your review | Week commencing 22 July 2024 |

| Action | Proposed timing |
|--|--------------------------------|
| Draft Cabinet paper and discussion paper and public engagement plan to you for consideration | Week of 12 August 2024 |
| Cabinet Economic Policy Committee meeting to approve public engagement | 11 September 2024 |
| Public engagement (6 weeks) | 23 September – 1 November 2024 |
| Complete funding mechanisms review and advise you of potential implications for Budget 2025 | 16 October 2024 |
| Analyse public feedback and finalise policy analysis | November-December 2024 |
| Brief you on recommendations | February 2025 |
| Report back to Cabinet | March 2025 |

- 39 There is strong interest in the review from the disability sector, and we have received communications asking for it to be completed as soon as possible. While this timeline pushes the review completion date out by two months, the additional time will ensure the disability sector has sufficient time (i.e. six weeks) to provide feedback as part of the public engagement, and we have sufficient time to thoroughly consider this feedback when developing recommendations.
- 40 Additional time will also allow us to align the review with the findings of Whaikaha's independent review into disability support services.

Next steps

- 41 If you agree to the refocused Terms of Reference and revised timeline, we will send the draft to NZTA, PTAs, Total Mobility providers, and the Disabled People's Organisations Coalition for feedback by 19 July 2024. We will then provide you with a briefing seeking agreement to the final Terms of Reference and timeline the following week.
- 42 In the meantime, we are continuing to work on the key policy issues and the discussion document. We are also assessing funding issues to inform the review and potential future Budget initiatives.
- 43 We will also develop a communications plan to support public engagement on the review and provide this to you with the draft Cabinet paper seeking agreement to release the discussion document. We will seek advice from Whaikaha on the best ways to engage with the disability sector as part of developing this plan.

ANNEX 1 DRAFT REFOCUSED TERMS OF REFERENCE FOR THE TOTAL MOBILITY REVIEW

This document replaces the initial Terms of Reference for the Total Mobility Review that were set in July 2023. The review will build on the work that commenced under the previous Terms of Reference. These Terms have been revised to give the review a clearer focus so that it can deliver on its original purpose.

Purpose

- 1 The purpose of reviewing the Total Mobility Scheme (Total Mobility) is to investigate how this scheme operates and how it can be improved to create better outcomes for disabled people.
- 2 The review will support the human rights of disabled people, as outlined in New Zealand's commitments under the United Nations Convention on the Rights of Persons with Disabilities.
- 3 The review aims to recommend improvements and changes that could be made to the scheme in the short-term (i.e. within the next few years). It will also identify longer-term changes and initiatives that may be needed in the future.

Scope

- 4 The review is covering four key areas:
 1. The purpose of Total Mobility
 2. How Total Mobility could be made more accessible for disabled people
 3. How aspects of Total Mobility's operations could be improved
 4. Sustainable funding mechanisms for Total Mobility

Area 1: The purpose of Total Mobility

The review is focusing on:

- 5 What the purpose of Total Mobility is and how it fits with other government initiatives to support transport accessibility for disabled people.
- 6 How Total Mobility aligns with the human rights of disabled people under the United Nations Convention on the Rights of Persons with Disabilities.
- 7 How Total Mobility and the transport needs of disabled people have changed over time, and how these could keep evolving in the future.

Area 2: How Total Mobility could be made more accessible for disabled people

The review is focusing on:

- 8 Eligibility criteria for Total Mobility users and whether these criteria are fit-for-purpose.

- 9 Assessment processes for people applying for Total Mobility and whether these processes are fit-for-purpose.
- 10 Whether the eligibility criteria and assessment processes are benefiting those who need Total Mobility the most.
- 11 Costs faced by Total Mobility users, including costs such as assessment fees.
- 12 The ability of people to use Total Mobility services in different regions, and how this may impact on disabled people travelling to different regions that deliver the scheme.

Area 3: How aspects of Total Mobility's operations could be improved

The review is focusing on:

- 13 Whether any changes are needed to make the scheme's delivery more consistent and equitable across regions that deliver the scheme, and opportunities to innovate.
- 14 The supply of Total Mobility services, including the availability of specialist wheelchair accessible vehicles and drivers, and options to increase service supply if needed.
- 15 Who should be eligible to operate as a Total Mobility provider.
- 16 Opportunities to deliver more innovative services to Total Mobility users.
- 17 How Total Mobility providers are financially compensated in the scheme and whether the scheme needs to be more attractive for providers to encourage them to provide services.
- 18 Whether operators are fairly compensated for installing and maintaining equipment such as wheelchair hoists.

Area 4: Funding mechanisms for Total Mobility:

The review is focusing on:

- 19 Current and projected funding needs for Total Mobility, and how these funding needs could be met to enable the longevity of this scheme.
- 20 How other government initiatives to support transport accessibility for disabled people are funded, and the interactions between these funding sources.
- 21 The potential for new or innovative funding mechanisms.

Approach for the review

- 22 The Ministry of Transport is leading the review. It is being informed by research and engagement with stakeholders.
- 23 The Ministry will engage with other government agencies, organisations that represent the interests of disabled people, individuals in the disabled community,

public transport authorities, and existing or potential Total Mobility operators during the review.

24 The review is intended to be completed by March 2025.

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Transport Portfolio Weekly Report

As at Wednesday 21 August 2024

Recipient

HON SIMEON BROWN
MINISTER OF TRANSPORT

Copy the report to Hon Matthew Doocey as
Associate Minister of Transport

Minister's comments:

Finalising the revised Terms of Reference for the Total Mobility Review

We last updated you on the Total Mobility review in mid-June 2024 (OC240544), seeking your agreement to revise the Terms of Reference to sharpen the focus of the review. Following your agreement, we shared the revised Terms of Reference with the Disabled People's Organisations Coalition (DPO).

In response to feedback from the DPO, we are proposing a minor change to Area 2 of the revised Terms of Reference. This involves replacing "How Total Mobility could be made more accessible for disabled people" with "How aspects of Total Mobility could be made more accessible for disabled people". This change will further sharpen the focus on eligibility criteria, assessment processes, need, cost, and regional variations.

The DPO has confirmed it is comfortable with this change and our approach to revising the Terms of Reference. It has also reinforced the need to carefully consider areas such as fraud, affordability, certification of service providers and innovation as part of the review. These areas are all covered by the revised Terms of Reference.

We are now seeking your agreement to publish the revised Terms of Reference on our website. We will also send a copy to key stakeholders and provide them with an update on the review.

Overall, work on the review is progressing well. We remain on track to share a discussion document for public consultation later this year. We are mindful of the work underway on implementing the actions identified by the disability support services review and will keep connected with relevant agencies as we progress our work.

Agree to publish the revised Terms of Reference on our website.

Yes / No