



**PARENTS OF VISION IMPAIRED (NZ) INC**

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*Providing a community to support parents of children with vision impairments*

9 March 2026

Total Mobility Consultation

Ministry of Transport

PO Box 3175

Wellington 6140

Via email to [TotalMobilityReview@transport.govt.nz](mailto:TotalMobilityReview@transport.govt.nz)

Tēnā koutou,

Please find attached Parents of Vision Impaired (NZ) Inc's submission on the **Total Mobility scheme**.

We are happy to provide further information if requested.

Ngā mihi,

Rebekah Graham

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## ABOUT THE REVIEW

The Ministry of Transport is consulting on proposals to make the Total Mobility scheme stronger for the people who use it and the people who fund it.

The Total Mobility scheme helps people with long-term impairments travel when they cannot use public transport on their own. It pays part of the cost for taxis and sometimes other transport, making it easier for users to meet daily needs and take part in their community.

The Government will keep funding Total Mobility, but as demand grows, we need to make sure the scheme reaches those who need it most. The review will look at short-term improvements and possible longer-term changes, keeping in mind funding is limited.

### **The Ministry of Transport is proposing to:**

- clarify Total Mobility's purpose and make eligibility assessments more consistent. We don't want to change who can get Total Mobility, but we want a clearer purpose statement and to strengthen the process to enter the scheme – strengthening evidence requirements and more regular checks that people still qualify for the scheme.
- introduce more targeted support allocations for Total Mobility. This includes ways to incentivise more wheelchair accessible trips and options to limit the number of subsidised trips a user can take, whether that's the same number of subsidised trips for everyone, or a lower initial subsidised trips that is increased depending on individual need.
- promote innovation in how Total Mobility is delivered. This includes enabling new types of providers to enter the scheme, such as ride-hail services like Uber and other forms of transport to meet the needs of Total Mobility users. We're still seeking feedback on what is needed to make sure new types of providers are still safe and accessible for Total Mobility users. We're also seeking feedback on introducing a national public transport concession for people with disabilities.

## ABOUT PARENTS OF VISION IMPAIRED NZ

Parents of Vision Impaired NZ (PVI) is a registered charity which supports parents who have blind, low vision, or vision-impaired children. There is no cost to enrol, and we provide a supportive community for parents who are overcoming challenges every day. We offer parents advice, information, and opportunities to meet other parents. We publish a quarterly newsletter (eVision) and have a members-only Facebook page for families and whānau to share information and to network. PVI runs an annual conference which allows parents and whānau to get together face to face for a longer time to talk, listen and learn in a social setting. PVI takes an active part in the disability sector through making sure that the voice of visually impaired children and their parents is heard in consultations with government, schools, local councils, and other organisations.

## PVI'S APPROACH

Our submission focusses on the needs of blind, deafblind, low vision and vision impaired children and their families and whānau. We often use the term disabled as a catch-all term to include blind, deafblind, low vision and vision impaired persons as many of our children have additional disabilities alongside vision loss.

In our submission, we draw on several key documents. These are listed below, and we have identified the relevant components of each for this submission:

**The New Zealand Bill of Rights Act (1990).** This Act states that everyone has the right to be free from discrimination from government and state officials, including on the grounds of disability.

**United Nations Convention on the Rights of the Child<sup>1</sup>.** In particular, Article 23, which recognizes that a mentally or physically *disabled child should enjoy a full and decent life, in conditions which ensure dignity, promote self-reliance, and facilitate the child's active participation in the community.* This includes access to independent and dignifying forms of emergency management.

**United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)<sup>2</sup>.** This was ratified by the New Zealand government in March 2008. Particular articles of relevance:

*Article 9* which states that, to enable people with disabilities to live independently and participate fully in all aspects of life:

*States Parties shall take appropriate measures to ensure to people with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas.*

And *Article 29*, which states:

*Parties will ensure that persons with disabilities can **effectively and fully participate** in political and public life on an equal basis with others, directly or through freely chosen representatives, including the right and opportunity for persons with disabilities to vote and be elected.*

**Enabling Good Lives Approach<sup>3</sup> and Principles<sup>4</sup>.** This approach applies a set of disabled-led principles into disability support services. The following principles are particularly relevant to our submission:

- **Ordinary life outcomes:** Disabled people are supported to live an everyday life in everyday places; and are regarded as citizens with opportunities for learning, employment, having a home and family, and social participation - like others at similar stages of life.
- **Mainstream first:** Disabled people are supported to access mainstream services before specialist disability services.
- **Easy to use:** Disabled people have supports that are simple to use and flexible

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<sup>1</sup> See <https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

<sup>2</sup> <https://www.odgi.govt.nz/united-nations-convention-on-the-rights-of-persons-with-disabilities/read-the-convention/>

<sup>3</sup> <https://www.enablinggoodlives.co.nz/about-egl/egl-approach/enabling-good-lives-summary/>

<sup>4</sup> <https://www.enablinggoodlives.co.nz/about-egl/egl-approach/principles/>

COMMENTS ON THE RIGHT TO TRANSPORT

Disabled people's rights to accessible, safe, and equitable transport are supported by the **United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)**, the **United Nations Convention on the Rights of the Child (UNCROC)**, and the **Enabling Good Lives (EGL)** approach used in Aotearoa New Zealand.

The **UNCRPD** establishes that accessible transport is essential for participation, independence, and equality. As a signatory to the UNCRPD, the NZ government must ensure transport systems are accessible, affordable, and inclusive, not segregated or difficult to use. The relevant articles include:

**Article 9: Accessibility.** Governments must ensure disabled people can access transportation on an equal basis with others. This includes:

- Identifying and removing barriers to transport systems.
- Ensuring public transport, infrastructure, and services are accessible.
- Providing accessible information about transport (e.g., announcements, signage, digital systems).

**Article 19: Living Independently and Being Included in the Community:** Transport access is required so disabled people can:

- Participate in community life
- Access education, employment, health care, and recreation.

**Article 20: Personal Mobility.** Governments must take effective measures to ensure disabled people can move with the greatest possible independence. This includes:

- Facilitating access to mobility aids, assistive technology, and personal assistance at affordable cost.
- Training for staff working with disabled people.
- Supporting mobility options chosen by disabled people.

**UNCROC** provides for transport rights for disabled children. As a signatory to UNCROC, the NZ government must ensure disabled children can physically get to school and community activities, not just theoretically have the right to attend. The following articles are of specific relevance:

**Article 23: Rights of Disabled Children.** Children with disabilities have the right to special care and assistance to ensure:

- Dignity
- Self-reliance
- Active participation in the community

Transport support may be required to enable access to education, health services, and community participation.

**Article 28: Right to Education.** Children have the right to education. For disabled children this often requires:

- Accessible transport to and from school
- Reasonable accommodation in transport arrangements.

This is often enacted via the SESTA transport system.

**Article 31: Participation in Cultural and Recreational Life.** Transport access is necessary for children to participate in play, leisure, sport, and community activities.

**Enabling Good Lives principles** shape disability system reform in New Zealand and strongly influence expectations around transport support. Key principles relevant to transport include:

- **Self-determination:** Disabled people and families should be able to **choose how they travel**, rather than being limited to inflexible systems.
- **Ordinary Life Outcomes:** Transport should enable disabled people to work, study, participate in community life, and live ordinary lives like others.
- **Mana Enhancing:** Transport services must respect dignity, identity, and culture, rather than creating stigma or segregation.
- **Easy to Use:** Transport systems and funding supports should be simple, flexible, and responsive.
- **Person-directed Supports:** Funding or services should support individual transport needs, including flexible options rather than only fixed services.

Taken together, these frameworks establish that disabled people have the right to accessible public transport systems (vehicles, stops, stations, information), affordable mobility supports (mobility aids, personal assistance, subsidies), transport that enables participation in education, employment, healthcare, and community life, non-discrimination in transport services, flexibility and choice in transport supports, and additional supports for disabled children to ensure they can attend school and community activities.

#### GENERAL FEEDBACK FROM PARENTS

Many parents commented on the language of the review. They were unhappy about what was perceived to be ‘political propaganda’ and an attempt to ‘pull the wool over our eyes’. It was perceived as being dishonest and the government lying about the reason for the review. The politically motivated language used in the review documentation was a barrier and made it difficult for families to engage with the review in good faith. It eroded good will, and left parents feeling like this was just about cutting costs and placing the burden of transport onto families – many of whom are already experiencing disproportionate amounts of material deprivation and need. The Minister would do well to use more neutral language that does not ad nauseum repeat National’s PR and comms.

Parents reminded us that public transport is often inadequate, that councils do not have money for a range of transport options, and that the government is well aware of the increase in both disability and an ageing population.

Parents also noted that the failure of successive governments to adequately plan for the increased transportation needs of an aging population is not the fault of the disability community. There was anger that parents of disabled children (and disabled persons themselves) are being expected to bear the costs of this failure to plan.

Parents were clear that a government that can afford to provide tax cuts, landlord tax breaks, and tax breaks for tobacco industries is a government that has made choices. The consequence of this government's choice is that they no longer have adequate income to support disabled persons transportation needs. There was anger that parents of disabled children are essentially being expected to pay for tax cuts for wealthier groups – despite households with disabled family members already being over-represented in poverty and material deprivation statistics.

#### PROPOSAL 1: SET A CLEAR PURPOSE STATEMENT

PVI has no specific feedback on this

#### PROPOSAL 2A: INTRODUCING EVIDENCE REQUIREMENTS AS PART OF THE ASSESSMENT PROCESS

We generally have evidence requirements and already must provide documentation for our children to access a range of supports. For our parents, having to provide evidence does not represent a significant change to business as usual.

We support this so long as the evidence requirements are **not overly burdensome** and recognise a range of evidence – for example, an ophthalmologist's report, orthoptist report, optometrists report, GP, or paediatric reports are all accepted as evidence. Parents should have to undertake an additional form of reporting or evidence gathering over and above what they already undertake.

#### PROPOSAL 2B: INTRODUCING PERIODIC REASSESSMENTS TO KEEP RECEIVING TOTAL MOBILITY SUPPORT

We strongly oppose periodic assessments.

- Our families already must undertake regular re-assessments for Work and Income NZ, NASCs/DSS funding, and regular medical reviews. Each of these reviews is highly stressful, anxiety inducing, and time consuming.
- There is no need to require our families to go through yet another reassessment for a permanent disability. Chromosomes don't magically reappear, and most blindness is a permanent disability.
- Requiring reassessments is administratively burdensome for the government, which means there is limited savings to be made.
- Re-assessments are re-traumatising for parents, which will erode goodwill and wellbeing if required.
- There needs to be a way to separate out temporary disablement (requiring a review or which expires after a set time) and permanent disabilities such as blindness (no review required).

### PROPOSAL 3: INTRODUCE CAPS ON TRIPS BASED ON LEVEL OF NEED AND CIRCUMSTANCES

We strongly opposed capping trips based on level of need and circumstance.

- When circumstances change, having to reapply for additional trips creates an administrative burden on the disabled person/parent/carer. This process creates another transport barrier for disabled persons. The additional costs while waiting for a review are borne by disabled people and their families, who are already more likely to be living with material deprivation.
- The community participation component only included MSD services. Many of our families use a range of community providers for day services. This component is far too narrow and does not reflect the reality of disabled lives.
- Having a cap will penalise parents in paid employment who rely on the service to transport their disabled young person to day services.
- We have blind/low vision parents who are raising low vision children. They were horrified to see that the suggested items list completely excluded domestic and caring duties. This implied that disabled people are neither parents nor involved in mundane activities such as grocery shopping, visiting malls, or taking children to sports practice. There was extremely limited confidence that a ministry that cannot conceptualise disabled people as parents who need to drop their child to ECE, school, or sporting events will be able to provide adequate advice on Total Mobility service needs.
- PVI notes the need further research on what is happening for the percentage of high users. An arbitrary cap will not address the underlying need, and without further data we cannot say why or how these trips are necessary.

### PROPOSAL 4: INCENTIVISE TOTAL MOBILITY PROVIDERS TO PROVIDE MORE WHEELCHAIR ACCESSIBLE VEHICLE TRIPS

NZ is currently behind other OECD nations when it comes to the provision of wheelchair accessible taxis, the provision of standard ramps for standard taxis, and the ability of standard taxis to transport manual wheelchair users easily

PVI supports ways to create increased availability of transport. We are aware that

- after hours travel is extremely difficult for many wheelchair users
- wheelchair accessible taxis are often unavailable after hours
- there is a growing need for larger vans for powerchair users. Many of these vans are used by transport providers for SESTA transport, but are not in circulation for taxi/total mobility use

### PROPOSAL 5: ENABLING NEW TOTAL MOBILITY SERVICE PROVIDERS TO ENTER THE SCHEME AND

PVI supports enabling new providers to enter the scheme. We note:

- We would like more choice of providers
- There are challenges with current providers, some of whom engage in exploitative and problematic practices
- There is limited opportunity and mechanisms to accurately report issues.

- We are broadly supportive of enabling rideshare companies to enter the market
- We do have concerns about rideshare companies upholding the rights of disabled persons, particularly with regards to guide dogs.
- We would support the development of an app/checkable summary for Total Mobility use that ensured providers weren't taking advantage.

#### PROPOSAL 6: INTRODUCE A NATIONAL PUBLIC TRANSPORT CONCESSION FOR PEOPLE WITH DISABILITIES

PVI is strongly supportive of a national public transport concession that provides consistency across regions. We would expect this to come with funding for regional councils rather than the costs being borne by locals in the form of increased rates. We note that many councils are already stretched financially, and that there is a need for funding from national government to enable this consistency.