

19/03/2026

Total Mobility Consultation
Ministry of Transport
Te Manatū Waka
PO Box 3175
Wellington 6140

Submission on the Total Mobility Scheme: Proposals to strengthen the scheme

Tēnā koutou

Age Concern New Zealand He Manaakitanga Kaumātua Aotearoa welcomes the opportunity to submit comments on the *Total Mobility Scheme: Proposals to strengthen the scheme*,

Older New Zealanders have a disability rate of 35%, which reflects the trend for disability to increase with age.¹ Some older New Zealanders have lived with a disability all their lives whereas others develop one or more disabilities as they age. The most common disabilities are mobility, hearing, vision, agility and cognitive impairments.

The high rate of disability amongst older people means the Total Mobility Scheme is a much valued and essential system to support those aged 65+ to live well in their neighbourhoods and communities. It enables them to access the goods and services they need and to stay connected with friends and whānau.

The outcome of this consultation is therefore very important to us as we work to ensure older people are valued, respected, have choices and can live with dignity.

Our submission comments are specifically from the perspective of our mahi with older New Zealanders.

Who we are

Age Concern is a trusted charity working in local communities throughout Aotearoa to support older people, their friends and whānau. Our values – Dignity, Wellbeing, Equity, and Respect for older people are our guiding lights and underpin everything we do. We aim to ensure older New Zealanders get the best advice and support no matter where they live in Aotearoa. With a network of 28 local Age Concerns operating in 38 locations, and a national

¹ <https://www.stats.govt.nz/news/1-in-6-new-zealanders-are-disabled/#:~:text=Disability%20rates%20increase%20with%20age,community%20spokesperson%20Nicolette%20Edgar%20said>.

office based in Wellington, we are the place to go for services and information about issues for older New Zealanders.

We are proud of our heritage in standing up for the rights of older New Zealanders for more than 75 years. As an organisation, our focus is on contributing to the overall health and wellbeing of older New Zealanders. We work to prevent the abuse and neglect of older adults; improve their health and wellbeing; reduce loneliness and social isolation; and provide advocacy for older people's rights.

Our comments

Age Concern New Zealand is providing feedback based on the Ministry of Transport's Feedback Form. Our responses cover Section 2 through to Section 5 and for simplicity we have retained the numbering from the Form.

We have included some background commentary from the feedback form in our document and have italicised those sections to distinguish them from our responses to questions.

Section 2: Proposals to clarify the purpose of Total Mobility and make assessments more consistent

Proposal 1: A clear purpose statement

The current definition is:

“Assist eligible people, with long-term impairments to access appropriate transport to meet their daily needs and enhance their community participation.”

*The **proposed new purpose** is:*

‘To provide subsidised mobility services to disabled people who are unable to access public transport because of an impairment, to support them to live their lives.’

Questions:

12. Do you support the proposed new purpose statement?

- a. **Yes**, strongly support

13. Is there anything you would change about the purpose statement?

- a. Reference to people with lifelong and age-related disabilities would enhance the purpose statement. Clearly some people live with a disability all their lives or from a

young age, but Total Mobility must be available for people who develop disabilities as they age.

- b. We especially support the purpose including reference to Total Mobility supporting people with disabilities to 'live their lives'. Life is not just about having basic needs met; each person is unique with their own set of circumstances, preferences and priorities. The Total Mobility Scheme plays an important role enabling older people with disabilities to have a positive sense of wellbeing and to remain engaged in their community.

Proposal 2: Make assessments fair and consistent

There are two proposals which could make the assessment process to be a Total Mobility user fairer and more consistent.

Proposal 2a: *Show evidence of your impairment*

Proposal 2B: *Regular reassessments*

Currently there is no requirement to be reassessed for Total Mobility. We are also thinking about whether we should require people to be reassessed for Total Mobility eligibility every few years to make sure users still qualify.

Questions

14. Do you think the Government should require documentary evidence when people apply for Total Mobility?

- a. **Yes**, support.
- b. We are generally supportive of an evidence requirement if this can be provided by a range of sources including a medical centre, doctor, disability organisation, NASC assessor, Supported Living assessor or similar.

15. What do you see as the benefits of this proposal?

- a. Documentary evidence is required for many applications and processes and will support robust objective decision-making.
- b. The documentary evidence may be useful to the applicant for other purposes.

16. What do you see as the costs or challenges of this proposal?

- a. There will be a financial cost to the disabled person to obtain documentary evidence which may be a barrier to the person applying for Total Mobility.
- b. People developing a disability as they age may not see themselves as having a disability, therefore applying for Total Mobility or asking for documentary evidence of a disability may not occur to them.
- c. Not all older people (or people of all ages with disabilities) own a digital device or have access to Wi-Fi and online services. Whichever Total Mobility Scheme processes the Government puts in place, they must have in-person and paper-based options as well as online services.

17. Do you think Government should require periodic reassessments for Total Mobility?

- a. Neither support nor oppose

18. What do you see as the benefits of this proposal?

- a. The only benefit we see for people with disabilities, including older disabled people, is if their condition has deteriorated and a reassessment leads to increased access to Total Mobility.
- b. Costs to the Government may be reduced if some people with a shorter-term disability no longer require Total Mobility. This would be offset by increased administrative costs.

19. What do you see as the costs or challenges of this proposal?

- a. If this approach is taken, we strongly recommend a tiered approach is adopted. If a person's disability is permanent, they should not be subjected to on-going reassessments to 'prove' their impairment still exists.
- b. Processes must be simple, accessible and consistent, or they will further frustrate people who already have much to contend with day-to-day.
- c. Any additional administrative processes will incur costs which will offset any savings through reducing access to Total Mobility.

20. If the Government were to require periodic reassessments, how often should this occur?

- a. We recommend that if periodic reassessments are adopted, they are no more than three to five yearly.

Section 3: Proposals on providing more targeted support for Total Mobility users

This section asks questions about proposals that aim to give more targeted support to Total Mobility users.

We are thinking about whether we should introduce a limit to the number of subsidised trips that a person can use each month to help manage the costs. We think this could be done in two different ways:

Proposal 3: Limit the number of trips

Option 3a: *Everyone gets the same initial number of subsidised trips regardless of personal circumstances (e.g. 30 to 40 trips per month)*

Option 3B: *Everyone gets the same initial number of subsidised trips, but some people get additional subsidised trips if they need it for some activities, like for work, healthcare, education, or community activities (e.g. 10 trips additional per month for health, between 10 to 40 trips per month for study)*

21. To target support, do you think Government should limit the number of subsidised Total Mobility trips a user can take?

- a. **No**, oppose

22. If the Government were to target support by limiting the number of subsidised Total Mobility trips a user can take, which option do you think would be better?

- **Flat trip cap (same number of trips for everyone)**
- **Introduce a base allocation of trips with additional trips available based on intended use**

- a. Flat trip cap

23. What do you see as the benefits of the proposal to introduce a flat trip cap?

- a. We consider allocating additional trips based on intended use is too intrusive and prescriptive.

- b. A flat trip cap would require minimal administration leaving more funds for the recipients of Total Mobility.
- c. Of the two options, a flat trip cap enables people to choose how they use their allocation, which is more in line with the proposed new purpose statement which includes the phrase 'to live their lives'. Having personal choice and the ability to make their own decisions is every disabled older person's right.
- d. Total Mobility is vital to enable older disabled people to access necessities such as groceries, medication, or to attend medical and other appointments. It also enables people with disabilities to visit friends and family or to participate in social and community activities. It should not be over to someone other than the person with a disability to prioritise or place value on some of these activities over and above others.
- e. Total Mobility enables people with disabilities to age in the community which is more cost effective than hospital level care.

24. What do you see as the costs and challenges of this proposal?

- a. We acknowledge the financial challenges of managing a system such as Total Mobility, especially as the population is both ageing and living longer. The number of people living with one or more disability will also continue to rise.
- b. A flat trip cap may mean people with the greatest need have access to an insufficient number of subsidised trips. There will need to be a process enabling them to receive an additional allocation but not for defined purposes.
- c. A flat trip cap may lead to people with disabilities becoming even more socially isolated and experiencing loneliness through having to limit their interactions with others.
- d. A flat trip cap limit would need to be overridden in circumstance such as a person dealing with a health issue requiring multiple appointments for treatment.
- e. We are concerned that the Total Mobility scheme could become increasingly prescriptive, reducing users' ability to live their lives as they would like.
- f. In isolated, rural and many provincial areas there are few if any public and community transport options available to use when a disabled person's flat trip cap is exhausted.

- g. Moving to bigger cities where more public and community transport options are available removes older people from their social and support networks.

25. What do you see as the benefits of the proposal to introduce a base allocation of trips, with additional trips available based on intended use?

- a. It may enable disabled people with the greatest need to have access to a higher number of subsidised trips to meet their social, physical, cultural and spiritual needs.

26. What do you see as the costs or challenges of this proposal?

- a. The administrative time and cost required to manage a two-pronged approach.
- b. The intrusive process for the Total Mobility user to define what category of trip they require and how often. Not all activities are on a regular schedule that could be defined easily.
- c. There is potential for involvement in social activities to be undervalued compared to activities such as attending hospital and primary care appointments or education opportunities. Total Mobility is essential for ensuring older people with a disability can maintain involvement in social activities, community groups and volunteer roles. These are important to maintain social, emotional, psychological, spiritual and cultural wellbeing. They enhance stimulation, integration and contribution to wider whānau/family and community.

27. Do you think there any categories of additional trips missing from the proposed list?

- a. We have nothing further to suggest.

Proposal 4: More wheel-chair accessible trips

Questions

28. Do you think the Government should increase incentives for wheelchair accessible vehicles?

- a. **Yes**, strongly agree

29. What do you see as the challenges to increasing wheelchair accessible vehicles?

- a. The cost of purchasing and maintaining hoists.
- b. The cost of vehicles and ramps suitable for carrying wheelchairs.
- c. The additional time required by the Total Mobility service to assist wheelchair users.
- d. Throughout Aotearoa New Zealand trained drivers and suitable vehicles are needed to transport people with mobility aids like walkers and wheelchairs. The number of wheelchair mobility taxi vans has decreased over recent years even in metropolitan areas.

30. What do you consider the best way to incentivise more wheelchair accessible vehicles?

- a. Increasing the \$10 per trip payment to providers offering wheelchair accessible trips. This has not been increased for over twenty years.
- b. Realistic consistent funding for transport providers across the country to become wheelchair friendly. Taxi services in major and provincial cities would then be more inclined to take on this work.
- c. Free training for staff to ensure competency and confidence dealing with wheelchair equipment and rides.

Section 4: Proposals to promote better ways to operate Total Mobility

This section asks questions about proposals to promote better ways to operate Total Mobility.

Proposal 5: Allowing new providers

We are thinking about whether we should make it easier for ride-hailing, on-demand transport, and community transport to provide trips under Total Mobility. If we do, we want to make sure it is still safe and easy for Total Mobility users to use these new providers.

Questions

31. Do you think the Government should enable these new types of providers?

- a. **Ride-hail services – Yes, Support**

- b. **On demand public transport – Yes, Support**
- c. **Community transport – Yes, Support**

32. What do you see as the benefits of enabling these new types of providers of Total Mobility?

- a. Additional total mobility providers would broaden the range of options available to people with lifelong or age-related disabilities providing choice to suit their needs and preferences.
- b. We have heard from partner organisations that younger people with disabilities are especially keen for providers such as Uber to be part of the scheme. They are confident using apps and consider this gives them a cheaper transport option.
- c. Many community providers, including iwi providers, have community shuttle services that take people to specific destinations. These providers often use a volunteer driver model and there may need to be changes to their current models to adapt to Total Mobility.

33. What do you see as the costs or challenges of enabling these new types of providers in Total Mobility?

- a. The safety for all Total Mobility users must be paramount if the scheme expands to new types of providers.
- b. Staff of new Total Mobility providers would need to adhere to the same training requirements as existing providers.
- c. Some of the suggested new types of providers use apps which not all older or other people with disabilities would feel confident using, even if they had a smartphone and were able to use it. Older people may prefer using cash to pay the driver so would be excluded from some new services.
- d. Some potential new providers do not assist the passenger to get into the vehicle or put on a seatbelt which would present a barrier for some disabled people.
- e. Some community transport providers may need a different operational model if they became a Total Mobility provider.

34. Are there any safeguards or supports that you think are needed to support Total Mobility users when enabling new types of providers in Total Mobility?

- a. Easily available and clear communication about the new providers.
- b. Total Mobility users would need to be fully aware if some assistance they are used to receiving from existing providers is not available through new providers.

Proposal 6: National public transport discount

In some parts of the New Zealand, disabled people can get a discount for public transport. Being eligible for using Total Mobility is sometimes used as criteria for this, pushing up Total Mobility numbers.

We are thinking about whether we should set up a national discount for disabled people on buses, trains and ferries.

35. Do you think the Government should introduce cheaper public transport fares for people with disabilities?

Yes, strongly support

36. What do you see as the benefits of this proposal?

- a. Some people with a disability would be able to use public transport. especially off peak, if it was free as it is for people 65+.
- b. At consumer reference group meetings we have frequently heard disability groups asking for cheaper or no cost public transport fares for people with disabilities similar to the provisions of the SuperGold card
- c. If the cheaper fares for people with disabilities was greater than the 50% discount available to Community Service Cardholders, it would reduce costs for people with disabilities who can use public transport.
- d. Increased use of public transport.

37. What do you see as the costs or challenges of this proposal?

- a. Some people with disabilities, including older people, may not be able to walk to the bus stop or train station due to their impairment.

- b. There are difficulties for people with a disability getting on and off buses, staying on their feet when trying to find a seat if the bus or train moves off, or dealing with the gap between the platform and a train.
- c. There are increased costs involved whether it is for cheaper or free public transport or maintaining funding for the existing Total Mobility Scheme.
- d. Isolated communities, rural areas and many provincial towns have little or no public transport which excludes people living in those areas from the benefit of such initiatives, including the older population.

38. Do you think that introducing cheaper public transport fares for people with disabilities would change demand for Total Mobility? If so, how?

- a. Potentially, but financial modelling and talking with people with disabilities would be the best way to find out. Total Mobility is primarily aimed at people with disabilities who cannot use public transport independently, however a support person may make this more viable for more people with disabilities.

Section 5: General questions

39. Do you think these proposals will impact any group of Total Mobility users more than others? (For example, Māori and Pacific populations, older people, youth or those in rural communities)

- a. If people with disabilities have access to fewer subsidised trips, their lives will be impacted negatively. This will add to the greater disadvantage experienced by the named population groups.

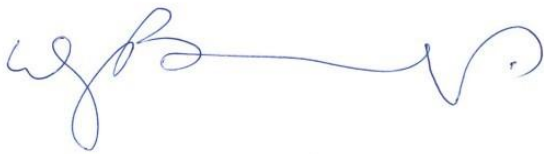
40. Do you have any other comments or suggestions that you would like us to consider?

- a. Referral pathways and information promoting the Total Mobility Scheme must be available in pamphlet form as well as online. The information needs to be in accessible formats and multiple languages.
- b. To ensure Total Mobility Scheme information is easily accessible to people with disabilities and their whānau it needs to be available in public facilities such as libraries, citizens advice bureaux, medical centres and through non-government organisations such as local Age Concerns.

Closing comment

Thank you again for the opportunity to provide our submission on the *Total Mobility Scheme: Proposals to strengthen the scheme*. We are very interested in the outcome of the consultation and look forward to hearing about the themes that come through in the feedback along with any subsequent decisions.

Nāku noa, nā,



Karen Billings-Jensen
Chief Executive
Age Concern New Zealand