

Inquiry into Lowering the Probationary Driving Age in Victoria to Seventeen

Submission by the Youth Affairs Council of Victoria

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About YACVic

The Youth Affairs Council of Victoria Inc. (YACVic) is the peak body and leading policy advocate on young people's issues in Victoria. Our vision is for a Victorian community that values and provides opportunity, participation, justice and equity for all young people. We are an independent, not-for-profit organisation.

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Inquiry into Lowering the Probationary Driving Age

The Youth Affairs Council of Victoria (YACVic) is the state peak body for young people aged 12-25 and the services that support them. We have 323 members – approximately half of them young people, the others comprising local governments, community and health services and research bodies. YACVic's vision is that young Victorians have their rights upheld and are valued as active participants in their communities.

We welcome the decision by the Legislative Council to inquire into lowering Victoria's probationary driving age to seventeen. Especially welcome was the Council's decision to also consider how other forms of transport infrastructure and services affect young people's access to employment, training and education.

As an organisation, we are guided in our work by the Code of Ethical Practice for the Victorian Youth Sector, which articulates key principles of working with young people. These include:

- The empowerment of young people
- Young people's participation
- The safety of young people
- Young people's connectedness to important people in their lives, such as family and community
- Positive health and wellbeing outcomes for young people
- The positive transitions and healthy development of young people.

The Code also outlines key practice responsibilities for working with young people, which include:

- Duty of care acting in the best interests of young people, avoiding exposing them to physical, psychological or emotional harm or injury, and upholding the principle of 'do no harm'.
- Social context recognising the impact of social and structural forces on young people, so that our practice is responsive to young people's experiences and needs, and breaking down barriers that restrict young people's life opportunities.¹

This submission will be guided by the above principles and responsibilities. It also recognises the tensions that can arise when seeking to uphold young people's safety and wellbeing and their ability to access opportunities, participate in their community and make successful transitions into adult life.

The terms of reference for the inquiry invite contributions concerning:

- 1. the impacts of lowering the probationary driving age in Victoria to 17, including
 - a) reviewing the licence structures in other Australian states, particularly the probationary driving age;
 - b) assessing the links between the existing 18 year old probationary driving age and high youth unemployment in regional areas;
 - c) reviewing the impacts of separating the legal driving age and legal drinking age;
 - d) considering relevant international licensing models and the positive and negative impacts of such; and
 - e) assessing the correlation between a reduced probationary driving age and the road toll;
- 2. the adequacy of current transport infrastructure and services available to people of nondriving age, particularly in regional Victoria;
- 3. strategies to remove barriers for people of non-driving age to access employment, study and training.

Young Victorians on the road

Learning to drive and getting a license is considered one of the milestones of young adulthood in Victoria. It increases young people's access to education, employment, support services and social/cultural life. The ability to drive independently can be especially important to young people living in outer growth suburbs of Melbourne and rural and regional communities, who may have to travel long distances in areas where other forms of transport are scarce.

This issue was brought to public prominence in 2015 when a Year 11 student from Werribee, Khalid Issa, launched an online petition calling for the probationary driving age to be lowered to 17, on grounds that it would help young people to access apprenticeship and employment opportunities, especially in suburbs where public

transport is poor. As Mr Issa argued, employers expect their young workers and apprentices to organise their own transport, but without regular access to a car this can become impossible, leaving some young people who want a vocational pathway in a holding pattern. To date his petition has gathered over 30,000 signatures.²

Young people in the circumstances described by Khalid Issa may be defined as experiencing 'transport disadvantage': difficulty accessing transport as a result of cost, availability of services or poor physical accessibility. We suggest it is no coincidence that Mr Issa's campaign originated in a growth suburb where many families are on lower incomes; Australians in the bottom income quintile are almost 8 times as likely to experience transport disadvantage as those in the top income quintile.³

Transport disadvantage takes a variety of forms amongst young people, and needs a range of solutions. In this submission, we will keep a focus on those young people who are most vulnerable to transport disadvantage, with the highest need for support.

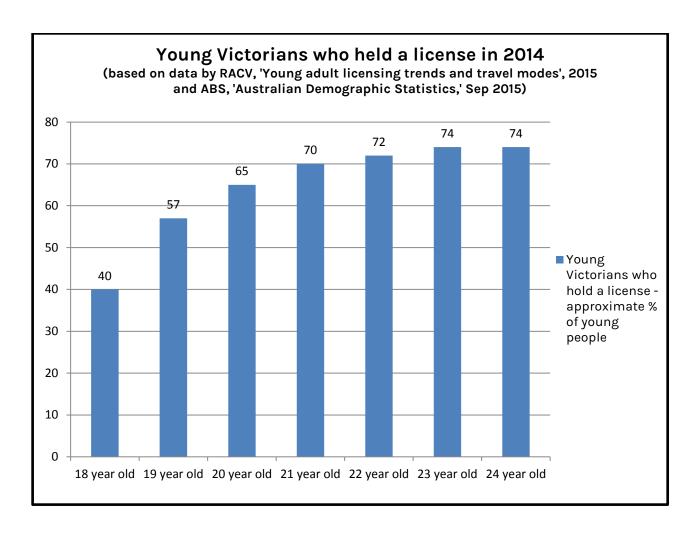
This paper compares young Victorians' access to probationary licenses to the systems operating in other Australian states, along with some lessons from overseas. We will consider the links between car dependence and disadvantage, and the adequacy of other forms of transport for young Victorians. We will offer suggestions for how young people's transport access might be improved, while also seeking to protect their safety.

It's not just 17 versus 18 - people learn to drive at different ages

Becoming an independent adult is a gradual process, and this is reflected in the rates at which young people access their probationary licenses. Not all young people access a learners permit at age 16, and it appears the majority of 18 year olds do not get their probationary license immediately. If the minimum age for probationary driving was lowered, it does not necessarily follow that all (or even most) 17-year-olds would take up this opportunity.

By cross-referencing the numbers of young licensed drivers listed by RACV for 2014 and the Australian Bureau of Statistics' population census of 18-24 year olds for that year, it would appear that only a (large) minority of young people are driving independently at

18, with the numbers rising sharply over the next three years, then more gradually after that. This shows that any support for young people to become safe, independent drivers should not focus solely on secondary-school aged young people, but should also consider the demand from a slightly older age group.⁴ (See graph below.)^{*}



From this, we would suggest that any lowering of the minimum probationary license age to 17 is unlikely to result in majority uptake amongst 17-year-olds, although of course large numbers might do so.

However, it is worth speculating whether lowering the minimum probationary driving age to 17 might result in the gradual trend of young people getting a license shifting back towards a younger cohort. i.e. would a minimum driving age of 17 mean that more 18- and 19-year-olds will access a probationary license? YACVic does not have the capacity to undertake such modelling, but we suggest that it would be worthwhile.

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^{*} Please note: the graph below cross-references two separate data sets, and thus provides an approximate estimate only. For a precise measure of the proportion of young drivers, more targeted, expert data analysis is needed.

Not all young people learn to drive

YACVic welcomes the Legislative Council's decision to examine other transport infrastructure and services as well as the licensing system. Not all young people get a license, even when they are aged 18 and over, and not all licensed drivers depend on cars all the time. Indeed, with Melbourne's roads under pressure and environmental concerns rising, it is more important than ever to promote and enable other forms of transport.

Since 2001, there has been a pattern of licensing decline among young Victorians. In 2014, over one-third of Victorians aged 18–24 were not licensed to drive. A recent survey by RACV of 147 young adults without a license found that their reasons included not liking to drive, being afraid of driving, being too busy, and finding the process of getting a license too difficult or expensive. Over a quarter of young people without a license said they had never learned to drive or were still learning.⁵

For some young people, this is clearly a personal preference. But answers like 'too difficult', 'too expensive', or 'afraid of driving' can encompass (and conceal) real forms of inequality. Some young people lack the money to pay for driving lessons, a car, petrol and insurance. Others do not have a licensed adult who can support them to complete 120 hours of driving for their learner permit period – for example, if the young person is living away from their family, if their parent has a mental illness or is not licensed to drive in Australia, or if they have no family car. Moreover, for some young people with disabilities or mental/physical health problems, independent driving may not be possible regardless of their age.

For the abovementioned groups of young people especially, their independence can rely on accessible and affordable public transport and suburbs which are designed for easy use by pedestrians, cyclists and wheelchair/scooter users.

In the interests of ensuring that *all* young people aged 12-25 have access to independent transport, YACVic prioritises young people's access to affordable, accessible and safe public transport and, where relevant, free and targeted support for disadvantaged young people to become independent drivers.

Safety remains a key concern

Across Australia, significant improvements in young people's road safety have been achieved in recent years through various forms of graduated licensing, an approach which phases in driving privileges over time and according to experience. In Victoria between 2003 and 2012, there was an annual average decrease in road deaths of 15-24 year olds of 3.9% per year.⁶

However, growing independence inevitably means new risks, and it remains the case that when young drivers move from their learners permit to their P1 license, they move from the lowest to the highest risk group in relation to fatal crashes. In 2014, 18–25 year olds made up 14% of Victorian license holders, but 21% of Victorian drivers killed on the roads. In their first year of driving, young drivers in Victoria are almost four times more likely to be involved in a fatal or serious crash than more experienced drivers. The Victorian Government estimates that 55 people die on the roads each year in crashes involving drivers under 25, while 1,245 people are seriously injured. Road crashes continue to be one of the leading causes of death for young Victorians aged 18–25.

Current supports for young people to become safe, independent drivers

Recently the Victorian Government released its new road safety strategy and action plan: Towards Zero, 2016-2020. This plan makes significant commitments to improve the safety of Victorians on the road, including through upgraded infrastructure, new policing measures and community engagement. It aims to reduce the lives lost on Victoria's roads by 20% over the next five years, and to reduce serious injuries by 15%. The plan identifies the importance of improving outcomes for young people, in light of their vulnerability on Victoria's roads.⁹

Towards Zero includes a \$146 million package to improve young driver safety. \$80 million of this will go towards setting up a Road Safety Education Complex, and new policing measures will be supported. Other key initiatives include:

From mid-2017, Year 10 students will be enrolled in the Practical Safe Driving
 Program with in-car and classroom components, which will teach students
 about road risks and support them to make safer driving decisions. The Victorian

Government has funded this initiative at \$24.4 million over four years from 2015.¹⁰ We await further details about how this program will align with existing school-based initiatives such as the Keys Please workshops led by VicRoads to inform Year 10 students about their learner period, the Fit2Drive peer mentoring sessions for Year 11 students (led by trained young facilitators), and the Looking After Our Mates model for Year 12s.

- The minimum number of hours of supervised night-time driving required of L-platers will increase from 10 to 20 hours. *Towards Zero* also notes that P1 drivers will be 'encouraged' to keep their late night driving to a minimum until they have built up further experience. We await more details about what this will mean.¹¹
- The L2P program has received renewed funding from the Victorian Government (\$16 million over four years from 2015). L2P enables young learner drivers under 21 years of age, who do not have access to a car and/or a supervising driver, to gain 120 hours of driving experience for free with a trained volunteer mentor driver and a sponsored vehicle. In 2015, there were 63 L2P programs operating around Victoria. L2P plays a powerful role not only in helping young people to get a license, but also in linking them with older mentors (very important for young people living with disadvantage or isolation) and building basic work-ready qualities like time-keeping, confidence, English conversation and social skills. 12
- Young drivers who complete four years on a probationary license with no road
 offences or demerit points are now eligible for a free three-year licence, provided
 they get their P1 license when they are under 21 and their probationary license
 expires before they turn 25. The Victorian Government allocated \$7 million over
 four years to this initiative (starting 2015), including anticipated revenue loss.¹³
- From 2015, a youth road safety community fund was established to develop campaigns, ideas and smart phone apps to reduce the crash risk of young drivers, funded at \$2 million over four years from 2015.¹⁴ An additional \$1.6 million was set aside over four years from 2015 for youth road safety grants for community groups to develop initiatives to promote safer driving habits of young drivers.¹⁵ We have yet to see much information released publically about these initiatives, and would welcome the opportunity to discuss any impacts or findings further.

 From 2015, trade apprentices who rely on their own car for work have been able to apply for a 50% discount on their vehicle's registration fee and Transport Accident Charge.¹⁶

We urge that any changes to probationary driving laws be integrated fully into *Towards* Zero, with appropriate dedicated planning and resources.

For example, if a decision were made to lower the minimum probationary driving age to 17 years, educational modules like the Practical Safe Driving Program and Fit2Drive would presumably need to be further developed to address this change; some of the young people taking part in the programs would be about to start driving independently, or might already be doing so. We would also anticipate that any road safety community education campaigns would prioritise initiatives to promote road safety and responsible decision-making amongst this cohort.

How does Victoria compare with other states?

There is considerable variety between the graduated license systems of different Australian states and territories. Based on an estimate of the number of road fatalities of 17-25 year olds as a proportion of that population cohort, it appears Victoria compares strongly in terms of young driver safety compared to most other states and territories. (Comparisons with Tasmania, NT and ACT are difficult, given their small populations).[†]

Victoria's licensing system is more cautious than that of most other states across a number of measures – not only the minimum probationary driving age, but also the number of hours learner drivers must accrue, the minimum learner permit period, the probationary license period, and restrictions on carrying young passengers. *Towards*Zero implies that Victoria's system may be about to impose or recommend new additional cautionary measures, such as restrictions on independent late-night driving for P1 drivers and increased numbers of required night-time hours for learners.

[†] Note: this is only an approximate estimate, obtained from cross-referencing the 2014 ABS Census and BITRE Road Trauma Statistical Report. It does not provide a breakdown of young drivers, passengers, pedestrians, riders and cyclists, as this data was not available on a state-by-state basis. Nationally, the majority of young people who die on Australia's roads are drivers or passengers.

State / territory	Minimum age for learner license	Minimum period of time on learner license for young people	Minimum required hours on learner license for young people	Minimum age of probationary license	Period of probationary license for young people	Restrictions on young probationary drivers include:	17-25 year olds killed on the roads in 2014 (incl. drivers, passengers, riders and pedestrians – further breakdown not available for all states)	Fatalities per 100,000 population for 17-25 year olds (estimate only from cross-referencing 2014 ABS Census and BITRE Road Trauma Statistical Report)
Victoria	16 years	12 months	120 hours	18 years	P1 – 1 year P2 – 3 years	P1 drivers must not carry more than one peer passenger aged 16-21.	49	6.7
New South Wales	16 years	12 months	120 hours	17 years	P1 - 1 year P2 - 2 ½ years	P1 drivers must not carry more than one peer passenger 11pm – 5am. Max 90km speed limit for P1 drivers. Max 100km speed limit for P2 drivers.	67	7.4
Queensland	16 years	12 months	100 hours	17 years	P1- 1 year P2 - 2 years	P1 drivers must not carry more than one peer passenger 11pm – 5am.	46	7.8
South Australia	16 years	12 months	75 hours	17 years	P1 – 1 year P2 – 2 years	P1 drivers must not carry more than one peer passenger midnight-5am unless accompanied by supervising driver. Max 100km speed limit.	18	8.9
Western Australia	16 years	6 months after Practical Driving Assessment	50 hours	17 years	P1 - 6 months P2 - 18 months	Driving prohibited midnight-5am unless for work or education.	41	12.7
Tasmania	16 years	12 months	80 hours	17 years	P1 – 1 year P2 – 2 years	Max 90km speed limit for P1 drivers in zones up to 100km, and 100km in zones up to 110km.	3	5.2
Northern Territory	16 years	6 months	-	16 years and 6 months	2 years	Max 100km speed limit.	6	17.8
ACT	15 years 9 months	6 months	-	17 years	3 years	-	3	5.6

Financial disadvantage and transport access

Over the past three decades, lower income households have been pushed out of Melbourne's inner suburbs where public transport access is good and into outer suburbs where they suffer significant transport disadvantage. In 2014, only around a quarter of Melbourne's low-cost private rental dwellings had good or very good access to public transport.¹⁷

In 2013, the Victorian Auditor-General's Office (VAGO) found that the growth areas of Cardinia, Casey, Hume, Melton, Mitchell, Whittlesea and Wyndham were inadequately serviced by public transport. For example:

- People in growth areas, on average, had less than half as many public transport routes as inner metropolitan residents.
- Access to public transport stops was worse in growth areas for example, approximately 45% of households in Cardinia were further than 400 metres from a public transport stop, as were almost 60% of houses in Mitchell shire.
- Bus services were less direct in growth areas than in inner and middle suburbs,
 making for longer journeys.¹⁸

Shortcomings in infrastructure, design, public transport and local job creation have worked to further embed car dependence in Melbourne's outer suburbs. For example, in 2013 less than 1% of trips in the outer suburbs were made by bike – a figure much lower than that of inner or middle suburbs – and in 2007 only 25% of short trips (2km or less) in the outer suburbs were made on foot, compared to 70% of short trips in the local government areas of Melbourne and Yarra. In our 2015 submission to the refreshed *Plan Melbourne*, YACVic called for stronger mechanisms to ensure that newer suburbs are designed so that people can reach local destinations – schools, shops, services, public transport, recreational spaces and some jobs – on foot within 20 minutes, using routes which are direct, convenient, safe, clean, adequately lit and attractive. ¹⁹

Meanwhile in rural and regional Victoria, access to public transport remains a frequent struggle. Young people in rural areas, especially on farms, can rely heavily on their parents to drive them everywhere; this is not only limiting and inconvenient (especially for single-parent families), but makes it harder for young people to preserve their

independence and privacy. Lack of public transport can also block rural young people from accessing alternative forms of education and training. The 2011 Victorian Government report *The State of Victoria's Children* found that young people aged 12-17 in rural Victoria were much less likely than their metropolitan peers to report having access to public transport – 56% compared to 81%. 51% of young people aged under 18 in rural areas reported that lack of transport made it hard for them to work, study, see a doctor and/or socialise, as did 41% of young people living in Melbourne.²⁰

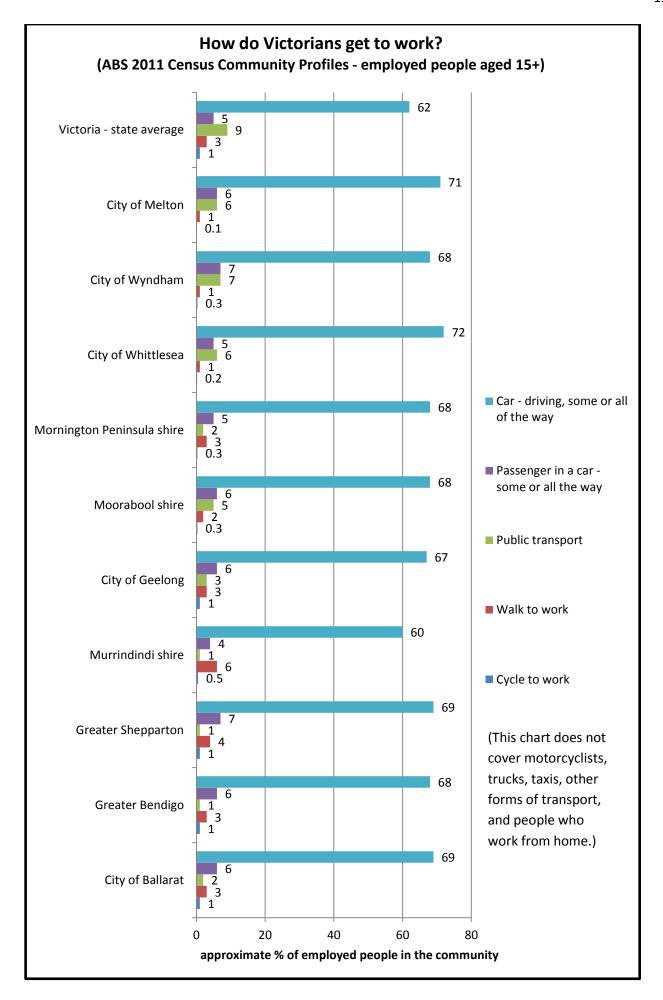
Employment and car dependence

In March 2016, 9.8% of young Victorians aged 15-24 who were not in full-time education were unemployed, an unemployment rate almost twice that of the general population.²¹ Young people's vulnerability to unemployment (and under-employment) varies considerably according to where they live.

Different measures of unemployment and under-employment exist, but they all point towards particular concerns in Melbourne's outer growth suburbs and Victoria's regional centres. The Brotherhood of St Laurence has identified Victoria's youth unemployment 'hot spots' including Melbourne West, Geelong, Hume, Melbourne North East, and Ballarat.²² Meanwhile, VCOSS has echoed concerns about high rates of youth unemployment in Geelong, and has identified significant youth unemployment in Warrnambool / South West, north-west Victoria, Bendigo, the Mornington Peninsula, and Shepparton.²³

In the table below we compare how employed people in Victoria get to work (according to ABS community profiles, 2011) in a number of communities which have high levels of youth unemployment according to the data sets used by VCOSS and BSL.

In almost all cases, it appears that communities with high rates of youth unemployment also tend to have higher than average rates of car dependence by people who are working. Employed people in these communities are less likely than the state average to use public transport, and usually less likely to cycle to work. This reflects the distance they must cover and the nature of local public transport and infrastructure.



Protective and risk factors

The existing research – much of which was conducted in the 1980s, 90s and 2000s – suggests there are strong safety benefits to young people beginning to drive independently at an older age – for example, at age 18 rather than 16. However, debate continues over the precise causal factors. So far, it appears that experience and age are both relevant. The more supervised practice a learner driver undertakes, the lower their risk of crashing once they commence driving solo, and this appears relevant regardless of the young person's age. However, age itself also appears to be a factor – for example, there is some evidence that 16 year-old independent drivers have higher crash rates than 17-year-olds drivers with the same amount of experience.²⁴

However, a number of other factors are also relevant. For example, young women as a cohort are also at a much lower risk than young men. According to TAC, in 2015, 78% of young Victorian drivers who died on the roads were male. Meanwhile, the following cohorts of young drivers have also been found to be more likely to display cautiousness on the road, and to be at lower risk of crashing:

- Young people whose parents model calm and cautious driving, and who provide the young person with lots of supervised driving support.
- Young people who experience (or expect to experience) social punishment for risky driving e.g. 'being told off' by their parents or peers.

Young people who are more likely than average to take risks on the road include:

- Young people who engage in risk-taking in other areas of their lives.
- Young people who experience social rewards (like being 'cheered on') for risky driving, and who are encouraged by other young people to take risks.
- Young people whose parents model risky driving.
- Young people who drive outside of the license system either without a license
 or with a cancelled license. According to modelling undertaken in the 2000s and
 1990s, these drivers face approximately five times the risk of a serious or fatal
 crash than that faced by licensed drivers. The elevated risk continues for this
 group of young people even after they get their probationary license.

The risks faced by young drivers also vary considerably according to where they are driving. Some rural areas present a particular risk, as many of the roads are high-speed and infrastructure may be relatively poor. For example, according to VicRoads and TAC in 2015, nearly two thirds of deaths of 18-25 year olds on the road took place in rural areas, along with 35% of serious road injuries for this age group. ²⁵

Supporting young people to make responsible choices - what doesn't work?

Regardless of the age at which young people start to drive, targeted interventions will always be needed to support them to make responsible decisions on the road. In light of the new work being done to implement *Towards Zero*, this seems a good time to review what effective and ineffective interventions can look like.

A literature review undertaken through the Victorian Community Road Safety

Partnership Program found that the following approaches were not useful in improving young driver safety:

- Road safety campaigns focused on solely on fear
- Presenting young people with 'facts and figures' about road safety, without actively engaging them in conversations about their own behaviour
- One-off events where young people hear speeches from police, traffic offenders or victims of road trauma
- Off-road driver training, go-carting and sports car racing
- Driving simulators or 'fatal vision' goggles.²⁶

Supporting young people to make responsible choices - what does work?

According to the literature, a number of approaches have shown success in improving the cautiousness and safety of young drivers. These include the following.

High quality, interactive education for young drivers

Education programs for young drivers (including those resourced by the Victorian Government in secondary schools) should be extended and interactive, not one-off

sessions. They should be evidence-based and delivered by trained professionals, and should actively engage young people in conversations about social norms and expected outcomes of different behaviours. It is important to focus on building young people's confidence to make responsible decisions, refuse dangerous options and develop practical coping skills in specific social situations.²⁷

It is also worth considering the possibility of post-license education for young drivers, to support probationary drivers when they first start driving on their own. Such models can be helpful – but only when designed on a strong evidence base. Many European countries have offered post-license training courses for young people who'd just begun driving independently, and the results have varied. Some programs proved ineffective and even harmful, often because they were 'one off' events or focused on teaching specific driving skills – e.g. getting out of a skid – instead of engaging young drivers about their choices on the road. Other programs appeared beneficial. An analysis of the Austrian model from 2009 showed this compulsory program had contributed to an average reduction of 28% per annum in the number of crashes with injury involving young people. After obtaining their driving licence, young Austrian drivers had to take part in a 3-part training course which consisted of the following:

- Driving skills analysis: 2 4 months after obtaining their licence, new drivers undertook a two-hour drive with a driving instructor, who provided feedback regarding individual driving style, paying special attention to observation behaviour, defensive driving and social interaction in traffic.
- Road safety training: 3 6 months after obtaining their licence, new drivers took
 part in a 6 hour training course focused on increasing their awareness and
 skills and enabling them to assess and avoid risky situations. On the same day,
 the drivers took part in a 2-hour group discussion under the leadership of a
 psychologist to discuss their responsibilities in traffic and the dangers of overestimating one's skills.
- Second driving skills analysis: 6 12 months after obtaining their licence, the
 drivers undertook another drive with the driving instructor, to assess how they
 had developed since their first analysis.²⁸

We would encourage further research and modelling to assess the possible benefits of introducing comparable supports for young probationary drivers in Victoria, especially (but not only) if the probationary license age were to be lowered.

- Safer vehicles

According to Senserrick and Haworth (2005), young drivers are disproportionately likely to drive cars that are smaller and older than the rest of the population, and which therefore tend to have poorer safety features. Factors influencing young people's choice of car have tended to involve access, cost and personal tastes, rather than safety. Towards Zero estimates that if every driver could drive the safest vehicle in their class, death and serious injury would drop by an estimated 26%, and undertakes to target parents and young people to encourage them to choose safer cars with features, such as auto emergency braking, speed alerting technology and lane departure warning, as well as seat belt reminders and side air bags. So

We would welcome this, but note that many families are not in a financial position to make such choices. We would encourage future initiatives to make second-hand vehicles with strong safety features (perhaps including vehicles formerly from government fleets) more easily available to young people on lower incomes.

- Restrictions on late-night driving

According to Senserrick and Haworth's 2005 literature review about international driver training and licensing systems, young drivers aged under 26 in Australia are at highest risk of fatality late at night, with the period of midnight to 6am on weekends accounting for more than double the number of fatalities of other times.³¹ According to the Australian Government Department of Infrastructure and Regional Development, night time crashes (between 9pm and 5am) account for 28% of all Australian fatal crashes but 40% of those involving the deaths of young adults. The greatest 'spikes' are on Friday and Saturday nights. Between Sunday and Thursday, and during daytime hours, there is far less difference between young driver fatalities and those of the whole population.³² (We would suggest that a 17-year-old young person driving at 2pm on a

Tuesday might arguably face less danger than an 18-year-old with the same amount of experience driving at 2am on a Saturday.)

International research would seem to echo the importance of caution in regard to latenight driving. A US study from 2011 used data from the Fatality Analysis Reporting System and the implementation of Graduated Driver Licensing laws across different American states (where many jurisdictions allow independent driving at 16), to estimate the effectiveness of restrictions on late-night driving. The study found that restricting 16- and 17-year-old drivers from driving after 11pm or 12 midnight reduced fatal crashes of this age cohort by approximately 10%, while restrictions on carrying young passengers reduced the involvement of 16- and 17-year-old drivers in fatal crashes by approximately 9%.³³ Other American and New Zealand studies also suggest that restricting late-night driving in recreational circumstances is effective in reducing young driver fatalities. Driving for purposes of work and education, or with an appropriate supervisory driver, appears to be of less concern and may be permitted.³⁴

Meanwhile, it is important that young people can take part in targeted education about night-time driving and driving with peers – young people themselves should play an active role in designing and delivering this education – and have sufficient access to alternative forms of transport at night.

What else do young people need to travel independently?

Essential to combating disadvantage is a high quality public transport network, with fast and frequent services, designed for universal access and with good coverage in outer suburban communities and rural and regional Victoria. Quality public transport makes it easier for people to take up employment and educational opportunities, access health and community services, and stay connected with family and friends.³⁵

The Victorian Government has committed to a number of major public transport projects and a Regional Transport Development Plan, which is very welcome. Priority directions for future work (as identified, in particular, by the Victorian Council of Social Service) include supporting universal design principles and accessible public transport, making better use of Victoria's bus services, improving access to multiple

forms of transport in rural and regional communities, and addressing affordability barriers.

Accessible public transport and accessible cabs/cars

While progress has been made in recent years, more attention is still needed to making the whole public transport system truly accessible in metropolitan and rural Victoria, including stops, stations, carriages, customer service and community consultation. At present, Victoria remains behind Disability Standards for Accessible Public Transport (DSAPT) targets, and appears unlikely to meet 2017 targets, which require the public transport system to reach 90% compliance for most services and infrastructure by December 2017.³⁶

This is particularly concerning in light of the threat currently posed to people with disabilities' access to subsidised, wheelchair-accessible taxi services. The Victorian Taxi Association has recently stated that it may no longer be commercially viable for the taxi industry to run a wheelchair-accessible service. Meanwhile, we hear frequent reports from young people with disabilities that taxis are already very hard for them to access and afford – while Uber only offers a limited service for people with fold-up wheelchairs and walkers.³⁷

A coalition of disability support organisations, including our partner organisation the Youth Disability Advocacy Service, have urged that any legalising of ride-sharing require a minimum number of wheelchair-accessible cars, extending the lifting fee and subsidies to Uber drivers who pick up people with disabilities, and offering subsidies for drivers who wish to modify their vehicle to make it accessible. We would support such a move.³⁸

In line with the issues raised by the Victorian Equal Opportunity and Human Rights
Commission in their 2012 report *Held Back*, further action is also needed to address the experiences of students with disabilities accessing bus services, including to specialist schools. Critical concerns include the need to minimise travel times (which can sometimes be dangerously long for students without access to food, water and toilet

facilities) and train all bus drivers and chaperones in disability awareness, human rights and 'failure to disclose' / 'failure to protect' legislation.³⁹

More responsive bus services

Suburban bus services can be easier and cheaper to reform than trains or trams.

However, at present many bus services are disjointed, irregular and circuitous. There should be a focus on ensuring that suburban buses run faster and more frequently, and integrate better with other modes of transport.

We note the research of Terry Burke et al (2013) for the Australian Housing and Urban Research Institute (Swinburne University). These researchers call for investment in a coherent bus network for Melbourne, characterized by a simple, user-friendly line structure; a consistent high quality of service all day, during the night and on weekends; regular 'feeder' services to nodes on trunk routes; and a transfer system which is easy and convenient. (This tends to mean all lines serving an interchange point should operate approximately every 10 minutes; otherwise there must be strong timetable coordination.)⁴⁰

Providing improved public transport to Melbourne's outer suburbs must go hand in hand with improving the 'walkability' of these suburbs. Most Melburnians who take public transport access it by walking – 92% of bus users and 59% of train users – which has incidental health benefits. In our submission to the refreshed *Plan Melbourne*, YACVic outlines a number of ways the walkability of suburbs can be improved.⁴¹

YACVic has also called for increased public transport to rural and regional Victoria. We support VCOSS's calls for regional communities to have a clearer, integrated ticket system, coordinated timetables, better public information, and orbital services to link different regional / rural locations.⁴²

In addition, we would support initiatives to make greater use of the rural school bus network. At present, the Victorian Government's School Bus Program makes provision for young people who are post-secondary students or apprentices to access the school bus system if they live at least 1.6km from the nearest public transport, if seating is available after school students are seated, and if reference checks are undertaken.⁴³

However, all of this still depends on the agreement of the coordinating school principal, and we have not seen recent data on how many non-school students and apprentices are really able to access buses. We would support further consultation and modelling in rural communities to see whether school bus networks could be utilised more effectively (especially during 'down times') to enable other young people to access education, training and employment – especially those young people who are aged under 19 and would have such access if they attended the local school.

- An affordable ticketing system

VCOSS has noted that emergency relief organisations spend significant resources assisting vulnerable people with problems relating to public transport – not only covering fares but also navigating a complicated ticketing and concessions structure and dealing with fines. A recent report by the WEstjustice Sunshine Youth Office, funded by the Victoria Law Foundation, found that there was an overrepresentation of young people from Melbourne's western suburbs in the infringement notice system, and that the fines system was presenting significant problems for families on low incomes and keeping some young people away from education, training and employment.

As such, we welcome the Victorian Government's recent commitment to providing better information to travellers, allowing for greater discretion and lenience in relation to 'one-off' or accidental breaches, reducing the time it takes to top-up Myki, and improving training for Authorised Officers.

This might be an opportune time to also consider the costs of travel. While travel is cheaper for students than other community members, the costs can still be substantial. For example, a yearly Myki student pass costs \$546. The WEstjustice Fare Go report noted that young people aged 11-16 (and older teens who are studying full-time) travel for free on buses and trams in London, and that eligible secondary students can access free or subsidised public transport in NSW and Canberra. The report made a number of recommendations, including:

- Making public transport free to all passengers up to 18 years of age, or for secondary students whose parent or carer is in receipt of Centrelink income or a healthcare card.
- Accepting identification issued by any authorised educational institution as evidence of age or student status for the purposes of free travel.
- Authorise schools to issue Myki travel cards to students free of charge.
- Abolish the public transport fines system for all young people under 18 years of age, or replace fines with innovative, non-fiscal responses to criminal behaviours.⁴⁶

YACVic sees merit in such approaches, and would support further steps to ensure young people experiencing disadvantage are not left without public transport access.

- Continue to support and expand the L2P program

One important measure supported by the Victorian Government to increase young people's transport access is the L2P program, which now operates in 67 communities right around the state. While YACVic was delighted to see funding for this program renewed, we know that in most communities the demand for L2P outstrips supply. Waiting lists appear to be common, and in some areas with scarce access to public transport, L2P programs have waiting lists of up to a year or more. L2P coordinators in some regions also tell us that they have many requests for help from young people who are ineligible for the program because they are over 21. For these young people, there are very few affordable support options; while RACV offers a free one-hour lesson for all learners through their keys2drive program, this cannot meet the extent of the need.⁴⁷

We would support further additional resourcing of L2P to meet the need in local communities, and would encourage the government to investigate the viability of extending the L2P program (or some comparable model) to young people aged up to 23.

Furthermore, if the minimum probationary license age were lowered to 17, it seems plausible that demand for L2P programs would rise accordingly. Some L2P coordinators have reflected to us that many young people they work with only approach the L2P program once they have turned 18, when they know they are eligible for a license and

see their peers driving independently. Modelling is needed to estimate what impact lowering the driving age might have on demand for L2P support, and resourcing would need to match this demand.

We would welcome the opportunity to discuss any of these issues further with you. Please contact Dr Jessie Mitchell, YACVic Policy Manager, on policy@yacvic.org.au or 9267 3722.

Recommendations

- 1. Ensure any chances to probationary driving laws are integrated fully into Towards Zero, 2016-2020, with appropriate dedicated planning and resources.
- 2. We recognise the dangers associated with driving solo at a young age. We do not wish to compromise young people's safety or promote driving as the only form of transport easily available to young people. However, we also recognise the links between employment and car dependence in communities with higher than average levels of disadvantage, and the pressures on some young people to start driving early in order to access training and employment. We encourage expert modelling of how the probationary driving system might be lowered to be made available to 17-year-old young people under specific circumstances. Such modelling should be informed by international findings about the value of restrictions on late-night recreational driving and carriage of young passengers, high-quality post-license education for novice drivers, extensive and diverse driving experience during the learner period, and safe vehicle choices.
- 3. To better inform this inquiry, consult directly with young people from a range of different Victorian communities. YACVic would be pleased to support such a process.
- 4. If a decision is made to lower the minimum probationary driving age to 17, dedicate resources for school- and community-based education programs to promote safe and responsible decision-making amongst this cohort. In particular, ensure that education modules like the Practical Safe Driving

- Program and Fit2Drive are further developed in response to this, to meet the new needs and experiences of young people in the classroom.
- 5. Ensure that any future initiatives to promote safe, independent driving amongst young people, such as the Practical Safe Driving Program, are evidence-based and interactive, delivered by trained professionals, and integrated into a wider curriculum (not just 'one-offs'). There should be a focus on building young people's skills in relation to responsible decision-making and coping with specific social circumstances, social norms and pressures. Young people themselves should be actively engaged in the design and delivery of such education.
- 6. Provide additional resourcing of L2P programs to meet the need in local communities, especially in areas where public transport is scarce.
- 7. If the probationary driving age is lowered to 17, undertake modelling to estimate whether this is likely to result in an increased demand for L2P programs, and ensure these programs are resourced accordingly.
- 8. In consultation with local communities and existing providers, support the extension of the L2P program (or an equivalent model) to young people up to at least the age of 23 who do not have access to a vehicle and/or a supervisory driver to support them to learn to drive and get substantial practice.
- Undertake further research and modelling to assess the possible benefits of engaging young probationary drivers in post-license training and education, informed by the lessons from European models.
- 10. As part of the *Towards Zero* objective on promoting safer car purchases amongst young people, develop initiatives to make second-hand vehicles with strong safety features (perhaps including vehicles formerly belonging to government fleets) more easily available to young people on low incomes.

- 11. Pursue the recommendations of the Fare Go report, funded by the Victoria Law Foundation, which included:
 - Making public transport free to all passengers up to 18 years of age, or for secondary students whose parent or carer is in receipt of Centrelink income or a healthcare card.
 - Accepting identification issued by any authorised educational institution as evidence of age or student status for the purposes of free travel.
 - Authorise schools to issue Myki travel cards to students free of charge.
 - Abolish the public transport fines system for all young people under 18 years of age, or replace fines with innovative, non-fiscal responses to criminal behaviours.
- 12. Continue to improve access to public transport in rural and regional Victoria, with a focus on a clearer, integrated ticket system, coordinated timetables, better public information, and orbital services to link different regional / rural locations. There should be detailed consideration of the use of assets, timetable and service coordination, and flexible transport options, including local buses, school buses, community transport services and taxis, and utilising relevant lessons from the old Transport Connections program. (For more information, see the work of VCOSS, especially their Submission to Public Transport Victoria, 'Regional Transport Development Plan,' September 2015.)
- 13. Redesign Melbourne's bus system, in consultation with communities and in light of research by bodies like the Australian Housing and Research Institute, to provide more services in underserviced areas, better connect with other transport modes, and run faster and more frequently.
- 14. Establish current levels of access to the School Bus Program by young people of secondary-school age who are attending alternative settings, vocational education and training, and apprenticeships, including the level of demand and the extent to which schools have accommodated this. Undertake further consultation with rural communities to see how school bus networks could be utilised more effectively, especially during 'down times', to enable more young people of secondary age to access employment, education and training.

- 15. Adopt universal design principles for the planning and design of Victoria's public transport system, and focus on meeting the Disability Standards for Accessible Public Transport, 2017.
- 16. Implement a regulatory and policy framework that maintains and enhances flexible access to point-to-point transportation for wheelchair and scooter users through the Multi Purpose Taxi Program and ride sourcing/ride sharing. In keeping with the recommendations of disability advocacy bodies including the Youth Disability Advocacy Service, ensure that any legalising of ride-sharing requires a minimum number of wheelchair-accessible cars, extending the lifting fee and subsidies to Uber drivers who pick up people with disabilities, and offering subsidies for drivers who wish to modify their vehicle to make it accessible.
- 17. Continue to implement the recommendations of the Held Back report by the Victorian Equal Opportunity and Human Rights Commission, concerning increasing access to bus transport for students attending specialist schools, reducing the maximum travel period on specialist school buses to one hour each way and providing specialist school bus drivers and chaperones with training in disability awareness and human rights. (We would add that it would also be valuable to provide training concerning the new 'failure to disclose' and 'failure to protect' laws concerning abuse of children.)
- 18. Take further steps to engage the youth services sector concerning the aims, activities and outcomes of the youth road safety community fund and the youth road safety grants, to promote any lessons for the wider community and consider how to reach diverse cohorts of young people in the future.

http://www.abs.gov.au/AUSSTATS/abs@.nsf/DetailsPage/3101.0Sep%202015?OpenDocument; RACV, 'Young adult licensing trends and travel modes', September 2015,

http://casr.adelaide.edu.au/casrpubfile/1805/CASRYoungDriverTravelChoices1557.pdf p.43

RACV, Young adult licensing trends and travel modes, September 2015; Lisa Wundersitz, Trevor Bailey, Simon Raftery, Matthew Baldock and Rebekah Smith (Centre for Automotive Safety Research, University of Adelaide, Royal Automobile Club of Victoria), 'Are young adults' choice of travel mode changing?,' Proceedings of the 2015 Australasian Road Safety Conference, 14 - 16 October, Gold Coast, Australia

⁶ Australian Government Department of Infrastructure and Regional Development, 'Young Adult Road Safety - A Statistical Picture, 2013, http://bitre.gov.au/publications/2013/files/is 051.pdf

⁷ Transport Accident Commission (TAC), 'Road Safety,' accessed May 2016,

https://www.tac.vic.gov.au/road-safety/tac-campaigns/young-drivers; TAC, VicRoads, Victoria Police, Victorian Government, Towards Zero, https://www.towardszero.vic.gov.au/safe-people/roadusers/young-drivers accessed May 2016

8 Victorian Government, Towards Zero 2016-2020 - Victoria's Road Safety Strategy & Action Plan, Melbourne, 2016, p. 21

⁹ Victorian Government, Towards Zero 2016-2020, p.9

¹⁰ TAC et al, 'Towards Zero'; Victorian Government, Budget Paper 3, 2016-17, pp.21, 34

¹¹ Victorian Government, Towards Zero 2016-2020, pp.8, 21

¹² VicRoads, 'L2P Learner Driver Mentor Program', accessed May 2016,

https://www.vicroads.vic.gov.au/licences/your-ps/get-your-ps/preparing-for-your-licence-test/I2p-<u>learner-driver-mentor-program</u>; Victorian Government, Budget paper 3, 2015-16, pp.21, 33; Victorian Government media release, 'Labor Saves L2P For Young Victorians,' 8 March 2015

¹³ VicRoads, 'Free license scheme,' accessed May 2016, https://www.vicroads.vic.gov.au/licences/yourps/free-licence-scheme; Victorian Government, Budget paper 3, 2015-16, pp.20, 32 Victorian Government, Budget paper 3, 2015-16, pp.21, 34

¹⁵ Victorian Government, Budget paper 3, pp.21, 35

¹⁶ Victorian Government media release, 'Rego halved for apprentice tradies', 5 May 2015

¹⁷ Terry Burke and John Stone, with Stephen Glackin and Jan Scheurer, 'Transport disadvantage and lowincome rental housing', Australian Housing and Urban Research Institute (Swinburne University of Technology), March 2014, AHURI Positioning Paper No. 157,

http://www.ahuri.edu.au/publications/download/ahuri 51003 pp, pp.1-2, 29

¹⁸ Victorian Auditor-General's Office, Developing Transport Infrastructure and Services for Population Growth Areas, Melbourne, 2013, pp.ix, xii, 16, 20

¹⁹ See YACVic, 'Plan Melbourne Refresh: Submission,' December 2015, http://www.yacvic.org.au/policypublications/publications-listed-by-policy-area/32-public-space/635-plan-melbourne-refresh-yacvicresponds

²⁰ Victorian Government, The state of Victoria's Children report 2011: A report on how children and young people in rural and regional Victoria are faring, Melbourne, 2013, pp.124-25, appendix

²¹ ABS, 'Labour Force: March 2016', 6202.0,

http://www.ausstats.abs.gov.au/ausstats/meisubs.nsf/0/1F74AD17C474DE0ACA257F9400184289/\$File/62 020 mar%202016.pdf

²² Brotherhood of St Laurence, 'Australia's Youth Unemployment Hotspots: Snapshot,' March 2016 ²³ Victorian Council of Social Service (VCOSS), 'VCOSS Snapshot: Youth Unemployment in Victoria and Melbourne's North,' 13 April 2015, http://vcoss.org.au/blog/vcoss-snapshot-youth-unemployment-invictoria-and-northern-metro/

²⁴ See the literature discussed in Australian Government Department of Infrastructure and Regional Development, 'Young Adult Road Safety - A Statistical Picture,' 2013, http://bitre.gov.au/publications/2013/files/is 051.pdf, Lyndel J.Bates, Siobhan Allen, Kerry Armstrong, Barry Watson, Mark J. King, Jeremy Davey, 'Graduated driver licensing: an international review.,' Sultan

¹ Youth Affairs Council of Victoria (YACVic), Code of Ethical Practice – A First Step for the Victorian Youth Sector, Melbourne, 2007

² The Age, 'Teen petitions state to lower driving age to boost job prospects,' 13 February 2015; Khalid Issa, 'Allow Victorians to obtain their P Plates at 17 years old,' accessed 13 May 2016, https://www.change.org/p/vicroads-allow-victorians-to-obtain-their-p-plates-at-17-years-old

³ Kate Rosier and Myfanwy McDonald, 'The relationship between transport and disadvantage in Australia,' Child Family Community Australia (Australian Institute of Family Studies) Resource Sheet - August 2011 ⁴ Australian Bureau of Statistics (ABS), '3101.0 Australian Demographic Statistics: TABLE 52. Estimated Resident Population By Single Year Of Age, Victoria,'

Qaboos University Medical Journal, 14(4), 2014, e432- e441; Allison E. Curry, Melissa R. Pfeiffer, Dennis R. Durbin, Michael R. Elliott, 'Young driver crash rates by licensing age, driving experience, and license phase,' Accident Analysis and Prevention, 80 (2015) 243–250; Teresa Senserrick and Narelle Haworth, 'Review Of Literature Regarding National And International Young Driver Training, Licensing And Regulatory Systems,' Report to Western Australia Road Safety Council Commissioned by the WA Office of Road Safety RFQ No. DPC803, June 2005, Report No. 239, pp.31-32; Allan F. Williams, Anne T. McCartt, Daniel R. Mayhew & Barry C. Watson, 'Licensing age issues: deliberations from a workshop devoted to this topic,' Traffic Injury Prevention, 14(3), 2012, pp. 237-243; B. Scott-Parker and T. Senserrick, Australasian College of Road Safety Conference – "A Safe System: The Road Safety Discussion" Adelaide, Methodology and broader implications of young driver research published in Traffic Injury Prevention in the past five years, 2013

²⁵ Australian Government Department of Infrastructure and Regional Development, 'Young Adult Road Safety - A Statistical Picture,' 2013; P.J. Knight, D. Iverson and M.F. Harris, 'Cautiousness in young rural and semi-rural drivers: Are there influencing factors?', Journal of the Australasian College of Road Safety, Vol 23 No 3, 2012; B. Scott-Parker, B. Watson, Mark J King, '"If they say go faster or something I'll probably go faster": Peer influence upon the risky driving behaviour of young novices,' ARSRPE Conference Paper Database, 2013 (speakers from University of the Sunshine Coast Accident Research, Faculty of Arts and Business, University of the Sunshine Coast Centre for Accident Research and Road Safety - Queensland, Queensland University of Technology (QUT) Institute of Health and Biomedical Innovation, QUT); B. Scott-Parker, B. Watson, M.J. King, M.K. Hyde, ' "My mother would freak out": Understanding the influence of parents on the risky behaviour of their young novice drivers,' (University of the Sunshine Coast Accident Research, Faculty of Arts and Business, University of the Sunshine Coast, Centre for Accident Research and Road Safety - Queensland, Queensland University of Technology (QUT) Institute, Health and Biomedical Innovation, QUT, School of Psychology and Counselling, QUT, Behavioural Basis of Health, Griffith Health Institute, Griffith University (ARSRPE Conference Paper Database); B. Scott-Parker, B. Watson, M.J. King, M.K. Hyde, 'Young and unlicensed: Risky driving before entering the licensing system,' Queensland University of Technology, 2012, (article also published in Traffic Injury Prevention) http://www98.griffith.edu.au/dspace/bitstream/handle/10072/49717/82565 1.pdf?sequence=1; TAC, 'Road Safety,' accessed May 2016, https://www.tac.vic.gov.au/road-safety/taccampaigns/young-drivers; Vicroads, 'Location of person injury level,' accessed May 2016, https://public.tableau.com/views/Injurystatfacts/Mapviewbypersoninjurylevel?%3Aembed=y& %3Adisplay_count=yes&%3AshowTabs=y&%3AshowVizHome=no#1&%3Adisplay_count=yes& %3Atoolbar=no&%3Arender=false; Victorian Community Road Safety Partnership Program, VRSERG, Victorian Government, 'Fact Sheet 3: High Risk Drivers and Young Offenders: Good Practice Guide,' no date included, accessed May 2016,

http://www.roadsafetyeducation.vic.gov.au/ data/assets/pdf file/0010/178732/High Risk Young Drivers and Young Offenders Good Practice Guide.pdf; Dr Lisa Wundersitz, Centre for Automotive Safety Research, The University of Adelaide, 'In-depth analysis of crashes involving younger drivers,' Australasian Road Safety Research, Policing and Education Conference 2012, 4 - 6 October 2012

26 P.J. Knight, D. Iverson and M.F. Harris, 'Cautiousness in young rural and semi-rural drivers: Are there influencing factors?', Journal of the Australasian College of Road Safety, Vol 23 No 3, 2012; Victorian Community Road Safety Partnership Program, VRSERG, Victorian Government, 'Fact Sheet 4: What doesn't work for young road users and why', accessed May 2016, date not provided on document, http://www.roadsafetyeducation.vic.gov.au/ data/assets/pdf file/0006/178791/What Doesnt Work for Young Road Users and Why.pdf

²⁷Victorian Community Road Safety Partnership Program, VRSERG, Victorian Government, 'Fact Sheet 2: Community Road Safety - Young Road User Safety Good Practice Guide,' no date given, accessed May 2016

http://www.roadsafetyeducation.vic.gov.au/ data/assets/pdf_file/0004/178717/Community_Road_Safety_Young_Road_User_Safety_Good_Practice_Guide.pdf; Victorian Community Road Safety Partnership Program, VRSERG, Victorian Government, 'Fact Sheet 4: What doesn't work for young road users and why'; Victorian Community Road Safety Partnership Program, VRSERG, Victorian Government, 'Effective Community & School Based Road Safety For Young People: A Summary Of The Research,' no date given, accessed May 2016,

http://www.roadsafetyeducation.vic.gov.au/__data/assets/pdf_file/0004/178789/Research_summary.pdf

²⁸ SWOV: Institute for Road Safety Research, 'Fact sheet: post-license training for novice drivers', April 2009, Leidschendam, the Netherlands

- ²⁹ Senserrick and Haworth, 'Review Of Literature Regarding National And International Young Driver Training', p.69; R.W.G. Anderson, S. Raftery, J. Grigo, T.P. Hutchinson, 'Access to safer vehicle technologies by young drivers: factors affecting motor vehicle choice and effects on crashes', *Casr Report Series*, CASR118, July 2013
- 30 Victorian Government, Towards Zero 2016-2020, p.24
- ³¹ Senserrick and Haworth, 'Review Of Literature Regarding National And International Young Driver Training', p.39
- Australian Government Department of Infrastructure and Regional Development, 'Young Adult Road Safety A Statistical Picture,' 2013, http://bitre.gov.au/publications/2013/files/is_051.pdf
 James C. Fell, Michael Todd, and Robert B. Voasa, 'A National Evaluation of the Nighttime and Passenger
- ³³ James C. Fell, Michael Todd, and Robert B. Voasa, 'A National Evaluation of the Nighttime and Passenger Restriction Components of Graduated Driver Licensing,' *J Safety Res.* (author manuscript; available in PMC 1 August 2012, published in final edited form as: *J Safety Res.* 2011 Aug; 42(4): 283–29), http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3251518/
- ³⁴ Lyndel J.Bates, Siobhan Allen, Kerry Armstrong, Barry Watson, Mark J. King, Jeremy Davey, 'Graduated driver licensing: an international review', Sultan Qaboos University Medical Journal, 14(4), 2014, e432- e441; Senserrick and Haworth, 'Review Of Literature Regarding National And International Young Driver Training', pp.39, 45
- ³⁵ VCOSS, 'State Budget Submission 2016-17', Melbourne, 2016, http://vcoss.org.au/state-budget-submission-2016-17/expand-peoples-transport-options/
- ³⁶ VCOSS, 'State Budget Submission 2016-17'; YACVic, 'Election Platform 2014', Melbourne, 2014, pp.17, 27; VCOSS Submission to Public Transport Victoria, 'Regional Transport Development Plan',
- http://vcoss.org.au/documents/2015/09/SUB 150911 Regional-Transport-Development-Plan-FINAL.pdf ³⁷ Kirsten Veness, 'Melbourne's wheelchair taxis "no longer commercially viable", Uber promises to step in,' ABC News, 27 March 2016; The Age, 'Disability groups fear Uber green light could leave them stranded,' March 22, 2016
- ³⁸ The Age, 'Disability groups fear Uber will kill off wheelchair cabs,' January 10, 2016
- ³⁹ Victorian Equal Opportunity and Human Rights Commission (VEOHRC), 'Held Back Fact Sheet: Main Findings', 2012, <a href="http://www.humanrightscommission.vic.gov.au/index.php/our-resources-and-publications/reports/item/184-held-back-the-experiences-of-students-with-disabilities-in-victorian-schools-sep-2012; VEOHRC, Held back: The experiences of students with disabilities in Victorian schools September 2012, Melbourne, 2012, pp.29, 32
- Burke et al, Transport disadvantage and low-income rental housing, pp.1-2, 16, 38, 42-45
- ⁴¹ Victoria Walks, 'Plan for a walkable Melbourne submission to Metropolitan Planning Strategy Discussion Paper Melbourne, let's talk about the future,' March 2013,
- http://www.victoriawalks.org.au/Assets/Files/Final%20MPS%20submission.pdf; Victoria Walks, 'Public Transport,' accessed December 2015, http://www.victoriawalks.org.au/PT_walking/; YACVic, 'Plan Melbourne Refresh: Submission,' December 2015, <a href="http://www.yacvic.org.au/policy-publications-listed-by-policy-area/32-public-space/635-plan-melbourne-refresh-yacvic-public-space/9000-yacvic-public-space/9000-yacvic-public-space/9000-yacvic-public-space/9000-yacvic-public-space/9000
- responds

 42 VCOSS Submission to Public Transport Victoria, 'Regional Transport Development Plan,' September 2015
- ⁴³ Victorian Government, 'School Bus Program: Policy and Procedures,' January 2016, http://www.education.vic.gov.au/Documents/school/principals/management/sbppolicy%202016.pdf ⁴⁴ VCOSS, 'State Budget Submission 2016-17'
- ⁴⁵ Su Robertson (Victoria University), 'Fare Go: Myki, Transport Poverty and Access to Education in Melbourne's West,' Melbourne, 2016
- 46 Robertson, 'Fare Go'
- ⁴⁷ Thanks for input from L2P coordinators in Port Phillip / Stonnington / Bayside, Frankston, Moonee Valley and Glenelg Shire.
- 48 VEOHRC, Held Back