

---

# ACTA Response to NDIS Support rules (Section 10) Consultation 2025

---

**Submission Date: 23 July 2025**



# ACTA

---

Australian Community Transport Association

---

Contents

About ACTA .....3

Background .....3

Executive Summary .....4

Summary of Recommendations .....5

Commentary and Answers to the Consultation Questions .....5

    Consultation Question A & B: .....5

    Consultation Question C: .....7

---

## About ACTA

The Australian Community Transport Association (ACTA) is the national peak body representing community transport providers across Australia. Established in 2011, ACTA unites organisations from every state and territory, QLD, NSW, TAS, SA, VIC, ACT, NT, and WA; giving the sector a strong, coordinated national voice. As a not-for-profit company limited by guarantee, ACTA is dedicated to advancing equitable, sustainable, and accessible community transport services nationwide.

ACTA has a proven track record of leading large-scale, complex sector reform and cutting-edge projects. As the key architect behind the development and national trial of the National Community Transport Pricing Model (NCTPM), delivered in the first phase in partnership with the Department of Health, Disability and Ageing, UniSA, and 31 pilot organisations; ACTA has demonstrated capability in sector-wide engagement, governance, and system change. The NCTPM project involved transitioning organisations to mainstream data platforms, developing a national cost-based pricing, implementing a policy evaluation framework, and facilitating some of the most effective sector-department collaborations seen in recent years.

## Background

In 2024, the Australian Parliament passed legislative amendments to the NDIS Act, setting the direction for how the NDIS will evolve to better support people with disability. These changes are now being implemented through a series of new NDIS Rules and an Exposure Draft, which outline how services and supports will be delivered under a reformed system. A key area under review is transport, including how participants access and use different types of transport services such as taxis, rideshare, and community transport. However, community transport, particularly services that are community-based, not-for-profit, and focused on safety, social inclusion, and accessibility have often been overlooked or misclassified within NDIS policy and pricing arrangements. Community transport is not the same as a taxi or Uber. The Australian Community Transport Association (ACTA) has prepared a formal response to the consultation on the new NDIS Rules and Exposure Draft. This response advocates for the inclusion of a clear definition of community transport, highlights the role of this service, and defines the difference between mainstream transport options and community transport. ACTA has engaged with members, service providers, and

---

sector experts to ensure the submission reflects the real-world experiences and needs of NDIS participants, especially those who rely on community-based transport services.

## Executive Summary

The Australian Community Transport Association (ACTA) welcomes the opportunity to contribute to the consultation on the new NDIS Rules and Exposure Draft. As the national peak body for community transport, ACTA advocates for the inclusion, recognition, and proper funding of community transport services within the scheme.

Community transport is fundamentally different from commercial transport options like taxis or rideshare. These services are delivered by community-based, not-for-profit providers using trained staff, wheelchair-accessible vehicles, and quality protocols that prioritise safety, dignity, and culturally appropriate support.

However, current NDIS rules do not clearly define community transport or recognise its unique delivery models. This creates confusion for participants, barriers for providers, and risks funding decisions made by participants and support plan coordinators.

To address this, ACTA recommends that the NDIS Rules:

- **Clearly define community transport as a distinct support type, separate from taxis and rideshare; and**
- **Formally recognise the "direct full-service delivery model", as outlined in ACTA's National Community Transport Pricing and Policy Arrangements Guide.**
- **Community transport is included in participants' plans when mainstream or foundational supports are not sufficient or appropriate to enable safe and equitable access to essential services, appointments, and social participation within the community.**

ACTA's submission draws on extensive engagement with providers, experts, and participants, and outlines practical recommendations for improving clarity, safety, and sustainability of transport under the NDIS.

---

## Summary of Recommendations

<b>R1</b>	<p>ACTA recommends that the NDIS Rules be updated to clearly define community transport as a distinct, essential service, separate from taxis and rideshare and formally recognise the “direct full-service delivery model” outlined in ACTA’s National Community Transport Pricing and Policy Arrangements Guide.</p> <p>This transport model, delivered by community providers using their own vehicles, workforce, and infrastructure, includes door-to-door support, culturally appropriate support, and specialised support for people with disability. Properly defining this model will ensure fair funding, informed participant choice, and safe, dignified transport for all NDIS participants.</p>
-----------	---

## Commentary and Answers to the Consultation Questions

### Consultation Question A & B:

#### What would help make the rule easier to understand?

#### How have the lists of NDIS Supports helped you to know what the NDIS can and cannot fund?

The current NDIS rules would be easier to understand if they included clear definitions of services and outlined the different service delivery models, particularly for supports like community transport. While the lists of NDIS-funded supports are helpful in indicating what the scheme can and cannot fund for transport support, they do not adequately capture the nuance of community-based service models or how participants interact with them. ACTA supports the NDIS goal of building participant capacity to access public infrastructure. But for many, this is simply not possible. Community transport is essential for people who cannot use public transport due to mobility, cognitive, or psychosocial impairments and who often face discrimination or safety risks using taxis or rideshare. These are not isolated concerns, through consultations with our members, we’ve heard countless stories that highlight the critical role community transport plays in the lives of people who cannot access or safely use public transport, taxis, or rideshare services due to mobility, cognitive, or psychosocial impairments. These challenges aren’t rare or exceptional, they are systemic. Here are real-world examples shared with us by community transport providers:

- 
- Farah’s family does not own a car. He needs to attend weekly appointments with his psychiatrist and a local day service. However, due to behaviours of concern, public transport and taxis are not viable options, they pose safety risks and cannot meet his support needs. Farah now uses Northside Community Transport, where the driver is not only trained and consistent but also understands Farah’s needs. The service supports his entire family during the journey, offering continuity and care that no mainstream transport service can match.
  - Akira, 18, has been working on “stranger danger” skills and is slowly building confidence. She now wants to visit friends independently; just two suburbs away. A risk assessment determined that exposing her to public transport would put her at high risk of exploitation. Her support worker coordinates with a local community transport provider so that Akira is picked up by a driver of the same gender, who is trained, background-checked, and supervised. The driver ensures Akira is safely connected with her friend before leaving. This simple arrangement opens up safe independence for Akira.
  - Eden, 32, recently started their first job. They find unpredictable environments and loud noise overwhelming, especially sudden changes or how strangers speak to them. Despite efforts, using public transport proved unreliable and unsafe, and their new job was at risk. After discussing alternatives, Eden began using Five-Wheel Community Transport. The driver is trained, consistent, and can recognise signs of stress, adjusting the environment or pausing the journey to help Eden reset. Eden now arrives at work on time, has made friends during their commute, and has held their job for three years. They’re known as one of the best employees on the team.

Unlike taxis or rideshare, community transport delivers both standard and wheelchair-accessible vehicles, trained and background checked staff, and door-to-door support tailored to people with disability. Services are provided by community organisations, not-for-profits, and charities that bring a human approach and caring, instead of what can seem like a dollar first approach. Drivers are trained in disability awareness, equipment handling, and mobility support, far beyond what commercial operators offer. As part of the National Community Transport Pricing Model (NCTPM), ACTA developed a Pricing and Policy Arrangements Guide that defines the unique characteristics of community transport and outlines its delivery model, the value provided, and the level of complexity based on an individual’s needs. ACTA

---

recommends that the NDIS Agency use this framework to help define community transport and its delivery mechanisms. Doing so will provide clarity to NDIS participants, providers, and planners, and ensure transport support is funded equitably and appropriately in alignment with participant needs. To learn more about the proposed definitions, please reach out to ACTA at [info@communitytransportaustralia.org.au](mailto:info@communitytransportaustralia.org.au)

### **Consultation Question C:**

**Are there any areas of the NDIS Supports rule (or lists) you think need to be changed?** This might include things that should be included in the list.

Yes, ACTA believes the new NDIS Supports Rule should be updated to include clear definitions of community transport service delivery models.

Specifically, ACTA urges the Agency to include the definition of the “direct full-service delivery model” for community transport. This model refers to services delivered entirely by community transport providers using their own vehicles, infrastructure, and trained workforce. It includes:

- Door-to-door assistance or chair to chair
- Support for cultural and language needs
- Additional support for participants that have functional support needs that cannot be met by other forms of transport or considered under the foundational supports.
- Provide a safe environment for vulnerable people.

This model ensures that all aspects of a participant’s transport journey are fully managed by a trusted provider, with a focus on safety, dignity, and continuity of support. In contrast, indirect delivery models, such as through taxis, rideshare, or public transport, lack integrated support, tailored assistance, and rigorous safety protocols required by many NDIS participants. Recognising and properly defining direct community transport delivery is critical to ensuring equitable access, enabling informed funding decisions, and supporting safe transport outcomes for NDIS participants.

## **Questions?**

For questions or clarifications please contact Murray Coates at: [ceo@communitytransportaustralia.org.au](mailto:ceo@communitytransportaustralia.org.au)