

Submission
No 62

INQUIRY INTO NSW TAXI INDUSTRY

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Submission to the NSW parliamentary Inquiry into the NSW taxi Industry.

Submission to the
New South Wales Parliament
Legislative council inquiry into the
NSW Taxi Industry

From

Spinal Cord Injuries Australia

Spinal Cord Injuries Australia contact

Sean Lomas, Policy and Advocacy Manager

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Submission to the
New South Wales Parliament
Legislative council inquiry into the
NSW Taxi Industry

From

Spinal Cord Injuries Australia

1) Introduction

Spinal Cord Injuries Australia is Australia's leading Charity supporting people catastrophically injured with a spinal cord injury and similar conditions. Our organisation, currently in its 42nd year, has a long history of providing services to our members and being a voice for their concerns both socially and to Government.

Our interest with the NSW taxi industry largely stems from the fact that many of our members and even non-members, that contact our organisation are reliant on wheelchair accessible taxis (WAT) to get to appointments. It is hoped that with greater access across many other modes starting to occur (rail stations, buses and ferries) for some the need to use WAT's will decrease however there will always be a larger number that continue to use them.

Currently the Disability Standards for accessible public transport (DSAPT) provide for requirements both for WAT interior spacing for wheelchair users and for a need to maintain response time's equivalency by September 2007 with regular taxis.

There are many criticisms that we hear about WAT's currently operating in NSW. These criticisms are at all levels of the service chain from Government subsidies under the Taxi Transport Subsidy Scheme (TTSS) through to driver training, taxi sizes and methods of restraint.

One member states:

"I don't like travelling in cabs. There is never enough room for an electric chair, the restraints are never put on properly, cab drivers are rude, they are never on time especially on return journeys, they drive to fast and I never feel safe".

Another member states:

"We recently had a wheelchair taxi added to the fleet in Young. Being in a country town I have had nothing but A1 service. I have the personal mobile number of the owner & he always tells me that the Wheelchair Cab is available 24/7. I have even got him out of bed a couple of times late at night and it hasn't fazed him".

2) Terms of reference

Inquiry Terms of Reference

Legislative Council Tuesday 10 November 2009. Minutes No 125, Item 26 page 1489-1491; as amended by the Legislative Council on 26 November 2009, Minutes No 130, Item 6 page 1566.

1. That a select committee be appointed to inquire into and report on the New South Wales taxi industry, and in particular:
 - a. the adequacy of government reporting standards and regulation of the industry and the impact of this on the provision of quality taxi services for commuters, including for people using wheelchairs,
 - b. the provision of government subsidies to the industry and the allocation and subsequent trading of free "Nexus" plates, including the impact on public revenue,
 - c. the effect of limits on the supply of unrestricted taxi licenses in New South Wales, particularly as it impacts on customer service,
 - d. anti-competitive activities in the industry and the Government's compliance with National Competition Council rulings,
 - e. the performance of the wheelchair-accessible taxi fleet, with special regard to Federal disability discrimination laws and their compliance with the 2002 Disability Standards for Accessible Public Transport,
 - f. the effectiveness of the Wheelchair Accessible Transport Taxi Driver Incentive scheme in providing better taxi services for people in wheelchairs,
 - g. the Government's response to the recommendations of a range of reviews into the taxi and hire car industry over the last decade,
 - h. the level of transparency and accountability in the regulation of the industry, including the reasons for the failure to make public reports flowing from six out of ten inquiries or reviews over the last decade,
 - i. the appropriateness and accountability mechanisms associated with the appointment of key Government ministers and bureaucrats to positions in the industry and its impact on Government policy,
 - j. regulatory structures in other Australian jurisdictions and the optimal framework required to achieve the best possible taxi service for members of the public in New South Wales,
 - k. working conditions and entitlements for taxi drivers, and
 - l. any other related matters.
2. That, notwithstanding anything contained in the standing orders, the committee consist of six members as follows:
 - a. two Government members,
 - b. two Opposition members,
 - c. Ms Lee Rhiannon, and

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d. The Hon Roy Smith.

3. That, notwithstanding anything in the standing orders, at any meeting of the committee, any four members of the committee will constitute a quorum.
4. That the committee report on Wednesday 14 April 2010.

3) Submission

a) the adequacy of government reporting standards and regulation of the industry and the impact of this on the provision of quality taxi services for commuters, including for people using wheelchairs,

It has often been felt within the disability sector that reporting standards and regulation for NSW taxi operators do not work to increase both the level of customer service and overall feeling of an equitable service. There is a feeling that the 'self-regulation' approach of empowering the NSW taxi council et al at the expense of proper guidance from the NSW ministry of Transport has resulted in a taxi industry that performs as it wishes.

The NSW Ministry of Transport accessible action plan from 2007, with an amendment in 2008 is falling short of aligning transport services with DSAPT requirements when it comes to WAT's. The aims of the DSAPT are for response times to be the same. Yes there have been some improvements as details in the table below showing the latest available public data.

Average Taxi Response Times (Sydney Metropolitan Area)

| Taxi Type | 2006/07 | 2007/08 |
|---------------|---------------|--------------|
| Standard Taxi | 7.58 minutes | 8.35 minutes |
| WAT | 11.41 minutes | 9.97 minutes |

This represents a 12.6% improvement in WAT response times from 2006/07 to 2007/08.

It is our thinking that this will plateau and response times can never be equivalent when there are so many things stacked up against achieving this. Things such as:

- 1) Private bookings by WAT drivers
- 2) The emphasis on equivalent times being placed on the dispatchers, how can they possibly manage equivalent response times when actual service delivery comes via the WAT drivers?
- 3) Response times in the regions of NSW being so far out from the standard taxi that they will always alter an average to the negative.

Service quality is something that is also reported to our organisation to be very worrying with such a varied experience from WAT drivers that often the 'regular' taxi driver, one who the wheelchair user feels know their job, will be the one of choice.

Anecdotally we have heard stories of wheelchairs broken whilst being restrained. Wheelchairs unrestrained as the taxi driver did not know how to apply the straps. There are some Taxi drivers that, already in receipt of the driver incentive, try to

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apply a separate loading and unloading charge on their passengers. We recognise that in every profession there are the few bad eggs but the resulting effect they have on both the wheelchair using passenger and the sector as a whole can be quite damaging.

It is the view of SCI Australia that the Ministry of Transport needs to do a lot more to bring the NSW taxi industry into line with regards to service levels, response times and overall fair and easy access to the market.

b) the provision of government subsidies to the industry and the allocation and subsequent trading of free "Nexus" plates, including the impact on public revenue,

The provision of government subsidies to the NSW taxi industry to increase the number of WAT's on the road has met with some success. Cheaper plates for WAT drivers, longer life vehicles and interest free loans to assist with the extra costs experienced when outfitting WAT's have helped. Where all of these subsidies and extras have fallen over is in the support for regional WAT's to grow at a pace in keeping with Sydney Metropolitan Taxis.

There were 129 WAT's operating in regional NSW (Sept 2004 WATT) this is 28.6% of the total number of WATs operating throughout NSW including Sydney. Of the taxis operating in regional NSW only on average 15% of the fleet is accessible, with some areas having as low as 3.1% (Newcastle) 3.2% (Orange) and 3.5% (Bathurst).

The importance of the WAT to the regional communities of wheelchair users should always be at the forefront of planning and subsidy allocation. Often, with there being no other form of accessible transport (bus networks do not reach all in Regional NSW) wheelchair users rely solely on WAT's and their system of dispatch.

Under the Disability transport standards, buses need to be, 25% accessible by September 2007 (a target met and beaten using Sydney metro bus weighting) there is no date for full compliance of the taxi fleet. The only formal measure comes under the DSAPT and requires equivalency of response times.

The measurement of response times is an issue in itself as first cab to arrive at a wheelchair users location, irrespective of whether the person.

The 188 Nexus plates issued in the 1990's have long been a misnomer. They are estimated to have generated \$29,000,000 worth of free revenue to the taxi operators and yet have led to little increase in the number of WATS on the roads. One of the greatest increasing elements has been the DSAPT and the need to achieve equitable response times. On a few occasions our organisation has attempted to find out what has happened to the Nexus plates (IPART annual taxi fare reviews 2008, 2009) yet have met with stony silence.

Let us put these plates into an historical context that contrasts with the present day situation. In the early 1990's the Disability Discrimination Act (DDA) was coming in for the first time in Australia's history. There was a push to remove inequities that existed in transport provision. The Nexus plates were a method used by the Ministry of Transport to ease that pathway; in that environment they seem logical. With the DSAPT coming in and ongoing NSW ministry of Transport accessible action plans as

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well as the federal government signing up to the UN Convention on the rights of persons with a disability in theory a great regulatory structure exists to encourage taxi operators to bring fleets up to parity.

It is the thought of our organisation that although original restrictions placed upon the Nexus plates to aid taxi providers offset the costs of bringing in wheelchair accessible fleets was a good move. With the subsequent dropping of these restrictions it would be too onerous to bring these plates back to an original purpose and thus they should simply be cancelled.

It is the view of SCI Australia that the NSW government should implement a scheme similar to the one in Victoria to offer loans to regional taxi operators with a view of them bringing WAT numbers up to parity with regular taxis. It is further our view that the Nexus plates currently in circulation should be cancelled at notice issued for their return.

c) the effect of limits on the supply of unrestricted taxi licenses in New South Wales, particularly as it impacts on customer service,

We can think of no reason why the NSW ministry of Transport limits access to unrestricted taxi plates.

A comment in the UK into a very similar set up stated:

John Vickers, Chairman of the Office of Fair Trading, described "hardcore cartels" as "tantamount to theft".¹

The Use of the word cartels was in reference to the agreements that existed between many local authorities and taxi providers to limit the number of unrestricted taxi plates resulting in higher returns for taxi operators and fewer taxis on the roads.

In NSW there is little evidence to support restricted plates. An International study in Dundee, Scotland, showed that when a market is opened to unrestricted taxi plates usually the result is not a flooding of taxis onto the streets but rather drivers purchasing their own plates breaking the stranglehold that many are under through the taxi plate leasing companies. The growth in actual vehicles will be more gradual.

It is the view of SCI Australia that the NSW government should proceed with plans to create unrestricted annual plates and work, actively, to support the best interest of the passengers not Taxi operators.

d) anti-competitive activities in the industry and the Government's compliance with National Competition Council rulings,

We only have to look at the situation that occurred in NSW with Lime taxis to see anti-competitive activities. With the current limitation of access to the NSW taxi

¹ Fagan, M: 'Teeth for the competition cops', *Sunday Telegraph*, 15 June 2003.

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council of new taxi providers to have a fleet of 100 taxis makes new providers vulnerable to the 90% monopoly that exists in NSW at present².

e) the performance of the wheelchair-accessible taxi fleet, with special regard to Federal disability discrimination laws and their compliance with the 2002 Disability Standards for Accessible Public Transport,

There is continual discussion in the disability sector about the legality of certain taxis operating within the NSW taxi fleet. The DSAPT lays down quite specific requirements for length breadth and height of internal space for the wheelchair user to travel in. Although it does not state that this shall be thought of as 3D space there is the implication there.

The DSAPT came up with the 90th percentile sizing of 1300mmx800mmx1400mm. This should accommodate 90% of all wheelchair users easily. Where the NSW government and taxi operators have fallen down is that these measurements have been interpreted in all manner of ways and thus an individual wheelchair user that correctly falls into the 90% cannot access all NSW WAT's. This is devastating for a few reasons:

- 1) It forces people to book with regular drivers as they know they can fit into the taxi decreasing the number available to 0200.
- 2) It increases dead running costs for the taxi driver as they can end up being rejected in the doorstep owing to an inappropriate taxi.
- 3) It increases admin costs for the 0200 booking service as they are now forced to ask people for taxi preference and in some cases ask about the size of the chair.
- 4) It diminishes life opportunities for people with a disability who are unable to seek employment, maintain social networks or partake in Education as they are never sure they will be able to get into a WAT and arrive on time.
- 5) It can also decrease the perception with new taxi drivers that running a WAT can be a profitable positive venture.

It is the view of SCI Australia that there needs to be an overhaul of all NSW WAT's to ensure compliance with the DSAPT. Failure to comply should see the taxi removed from service until the sizing issue is rectified.

f) the effectiveness of the Wheelchair Accessible Transport Taxi Driver Incentive scheme in providing better taxi services for people in wheelchairs,

As we understand it the Wheelchair Accessible Transport Taxi Driver incentive scheme operates by the Taxi networks paying the drivers, the TTSS dockets on which the bonus incentive is paid on, is processed through Cab charge who invoices the

² Economic evaluation of Taxi Industry reform in Sydney – Peter Abelson, Department of Economics, University of Sydney, May 2009 page 5.

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Ministry, the Ministry refunds Cab charge and Cab charge refunds the operator/networks and then the drivers.

It seems like an odd situation that a blanket payment designed to offset the extra dead running costs and increased loading and unloading times experienced by WAT drivers should exist at all. With it existing why is it a standard unrestricted payment?

Would a better model be to use the payment to encourage drivers to work in outer lying areas of Sydney (WAT black holes such as Penrith and areas of Northern Sydney) and in regional NSW to get taxi numbers and service levels up? If it has to exist it could be used as a tool to reward good service but when it appears to be a simple straight forward payment it encourages little.

It is the view of SCI Australia that the Wheelchair Accessible Transport Taxi Driver incentive scheme be pulled back from a blanket payment for all WAT drivers accepting Wheelchair bookings to a payment used to encourage greater WAT participation in traditionally non lucrative areas. It is still problematic as a payment as the emphasis of the DSAPT should be on compliance or face risk of prosecution; it's not the role of the government to pay WAT drivers to accept wheelchair bookings.

G) the Government's response to the recommendations of a range of reviews into the taxi and hire car industry over the last decade,

It is difficult to pass comment here.

H) the level of transparency and accountability in the regulation of the industry, including the reasons for the failure to make public reports flowing from six out of ten inquiries or reviews over the last decade,

It is difficult to pass comment here.

I) the appropriateness and accountability mechanisms associated with the appointment of key Government ministers and bureaucrats to positions in the industry and its impact on Government policy,

As we understand it this practice of appointing bureaucrats into Industry and vice-versa is not only linked to the NSW taxi industry. There are public examples of this occurring within the department for education, ageing, disability and homecare and an inversely within State Transit and other providers.

In terms of how appropriate this is, it is hard to state. Industry needs experts in the relevant fields as do Ministries. We certainly endorse looking into mechanisms to regulate the political nature of these appointments and to ensure that public servants remain apolitical.

It is the view of SCI Australia that the nature of these appointments should be open to greater parliamentary scrutiny.

J) regulatory structures in other Australian jurisdictions and the optimal framework required to achieve the best possible taxi service for members of the public in New South Wales,

We are not in a position to comment

K) working conditions and entitlements for taxi drivers, and

We are not in a position to comment

L) Any other related matters.

The NSW Taxi Transport Subsidy Scheme (TTSS) [www.transport.nsw.gov.au/ttss] is available to eligible people to assist with the cost of WATs by providing a 50% subsidy of the metered taxi fare up to a maximum \$30 subsidy of a \$60 taxi fare. To qualify for the TTSS, an applicant's disability must be permanent. The eligibility of an applicant depends on the extent or severity of the disability or mobility limitation, and must fall strictly within one of the following categories of Ambulatory Problems, Vision Impairment, Epilepsy, Intellectual Disability or other Functional Disabilities in relation to communication difficulties.

For people with ambulatory problems to be eligible for the TTSS they must:

1. Be unable to walk or stand. Mobile only in a wheelchair due to physical disability; or
2. Be mobile outside of home only with a wheelchair due to physical disability; or
3. Have a severe and permanent ambulatory problem that cannot functionally be improved which limits walking to an extremely limited distance.

The NSW TTSS subsidy was last increased by \$5 to the current maximum \$30 (50% of a \$60 taxi fare) in 1997, however, NSW taxi fares have increased by 44% since then resulting in taxi transport becoming increasingly unaffordable for many people with a disability, particularly those on a pension, low income and/or who live in rural and regional areas with long distances to travel. (There are some rural or regional areas that do not have any form of accessible public transport or WATs.)

It should also be noted that WAT drivers are legally permitted to engage the taxi meter when they start assisting the wheelchair passenger into the vehicle and applying the wheelchair restraints and passenger seatbelt. Depending on the type of vehicle (and its conversion), plus the WAT driver's experience, the time taken to assist a wheelchair passenger prior to starting the journey can add up to \$5.00 (\$.83cents* per minute) to the cost of the taxi fare on top of the \$3.20* flag fall and \$2.10* radio booking fee. This can add up to \$10 to the taxi meter prior to the journey commencing. [*Note: Sydney metropolitan taxi fares as of July 2009].

The NSW Ministry of Transport reports the average WAT fare is \$30 (\$15 TTSS subsidy) when transporting a passenger with the disability and that the NSW TTSS is

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the most flexible and generous government funded taxi transport subsidy scheme in Australia because there is no restriction or limit on the use of the TTSS dockets.

Furthermore, as the use of the NSW TTSS dockets is unlimited (only limited by a passenger's ability to pay for the unsubsidised taxi fare), SCI Australia would also like to propose that the TTSS subsidise the first 75% of taxi fares (maximum \$75 of a \$100 taxi fare). If this was implemented, in conjunction with a compulsory passenger payment of \$5 per trip, it would also certainly improve the cost of taxi transport affordability for people with a disability and increase their opportunities for social participation, education and employment.

It is the view of SCI Australia that there is an urgent need for the TTSS to be reviewed with the aim of increasing the subsidy percentage from 50% to 75% and increasing the upper limit of the subsidised taxi fare from \$60 to \$100. These positive changes will result in a maximum \$75 subsidy of a \$100 taxi fare, plus the average \$30 taxi fare for a passenger with a disability will result in a \$22.50 taxi fare subsidy saving the passenger \$7.50 per trip. But longer journeys, particularly for those people living in rural areas, would be much more affordable.

The NSW government needs to further explore the idea of a universal taxi design that will replace all taxi models granted licences in NSW within the life of 1 WAT vehicle. If on-time parity is to continue being a prerequisite of the DSAPT how can this be maintained when the two greatest pulls on the system are:

- Only 14% of the fleet are WAT's and the majority of them in Metropolitan Sydney and even then are not distributed evenly. For instance if I want a WAT in Penrith there is no chance of getting one for some time and in contrast if I want one in Paddington I can almost hail one on the street corner.
- Many wheelchair bookings are done by private booking ensuring that many WAT's are off the M50 booking system and effectively operating independently. This obviously is good for the driver and sometimes good for the wheelchair user. I say sometimes good as often, when a rapid booking is needed, their chosen taxi driver may be busy and so have to slot them in when it is convenient for them. This decreases the opportunity for easy hire by the wheelchair user.

A universal taxi fleet operating in Sydney will be beneficial as it will:

- Allow for service response time parity
- Decrease dead running costs as nearest cab can respond to any 0200 booking.
- Increase the life time of all cabs making them more profitable to operate.
- Aid in ensuring that the now complex 0200 booking arrangements where you need to state preferred taxi model can be removed ensuring that all jobs are

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available to all and that no inappropriate taxis arrive at pick up point to be turned away for being too small.

- Lead to decreased maintenance costs over the life of a vehicle as a standardised design can lead to better negotiating power for common spare parts.
- Support better customer service through a standard restraint system that will be easier to convey during training than the myriad of ones for the many different vehicle designs currently operating.
- Form part of a greater education for able bodied passengers by assisting them in understanding some of the needs of passengers with a disability.

These are some of the arguments for a universal design. There are currently a few models out there such as the famous London Black Cab through to the Nissan V200 Vanette Taxi to be shortly deployed in Tokyo.

It is the view of SCI Australia that the NSW government working with the disability sector conducts a formal feasibility study into the creation of a Universal fleet of taxis. This study needs to commence as a priority. With an ageing population the need for WAT's will grow dramatically over the coming years.

4) **Personal Comments from our members**

New England

"There were issues with travel - mainly around safety issues, courteousness and the knowledge of the taxi driver where tie-downs were concerned. The major concern with the country towns was the availability of disability taxis. Tamworth has a number - not enough but there has been an increase recently. The drivers are improving in their mannerisms but there have been very rude and obnoxious people in this position - one can report these but there is no outcome. I have seen taxi doors flapping as they drive away and tie-downs that could break a chair in two if an accident occurred. It was only recently that Gunnedah got a disability taxi. Up until that time - clients who needed travel had to be pushed and pulled into an ordinary taxi - no-one could travel in a wheelchair of course, except privately. There were OH&S issues coming from everywhere and complaints that the clients were wrecking the taxis!! Eventually the disability service agreed to convey the clients around but this took away the client's choice and independence but safety was the key issue".

New England

"I've been so long without a taxi service that I have become used to providing my own vehicle and using some body I pay to drive me.

I use community transport otherwise to go to funerals etc.

Because I am in the country, taxi service is a bit too expensive as I am a self-funded retiree".

Sydney Metro

"I have now lived as a spinal cord injured person for 15 years, residing in that time in 3 states and I have travelled throughout Australia. We have now lived in Sydney for 6 months.

The lack of adherence to the relevant standards for wheelchair accessible taxis in NSW has resulted in Sydney having the LEAST accessible wheelchair taxi fleet on any capital city in Australia. The majority of so branded Accessible vehicles are simply inaccessible as they do not meet the minimum height or depth requirement.

Because of this, only the Toyota Hi-Ace vans are accessible to me. As a result the service is entirely unreliable and unsuitable to my needs as the user of an electric wheelchair. It represents an appalling failure on the part of the Taxi transport industry and relevant authorities to meet a basic need of disabled consumers.

Only a small % of the so called WAT fleet does in fact adhere to the minimum standards for the space required to accommodate a wheelchair. As a consequence taxis booked by me are rarely on time, sometimes leaving me stranded for hours. Recently, late one evening I waited over 2 hours to return from Woolloomooloo to the City. I recently waited over 90 minutes on a Friday afternoon in Little Bay to return to Bondi. During these times dozens of regular cabs met the needs of other patrons. The inequity is inexcusable.

I have a friend presently in Hospital in Randwick. On a number of occasions I have booked taxi's to visit her but these bookings have been unable to be filled within a reasonable time.

The solution is clear. By ensuring adherence to the relevant minimum standards, as has been done in Queensland, Victoria and WA, the fleet can become accessible to ALL wheelchair users and even importantly accommodate multiple people who use wheelchairs travelling together. Presently only the Hi-Ace buses meet the standards- all the other vehicles ought to be replaced with these vehicles.

In terms of the limited number of taxis available, being the "large bus" the drivers and generally courteous however a number of the vehicles are simply unroadworthy.

The booking system is generally sound, and the "on approach" call back system is without peer. It is regrettable the online booking systems do not accommodate wheelchair fleet users. This could and should be rectified".

Lismore

"When I book a taxi or ring 9 times out of 10 I have to wait for at least an hour for one to be available.

The taxis are not long enough for my wheelchair and the back door hits my wheelchair and forces the headrest forward hitting me on the head.

The drivers do not always strap me into the taxi properly so I move around in the back as they drive.

The drivers put the straps on my bar under the chair that allows me to control my chair myself and break it so that I can't move my chair myself.

They put the meter on before I am in the cab so I have to pay up to \$10 before I leave my driveway.

Drivers are always complaining about the way my wheelchair is made and blaming it for any problems they have with getting me in the cab.

Drivers often drive 10 to 15kms under the speed limit and so I pay a lot more money for a short trip.

it is impossible to get a taxi to go anywhere at 3pm weekdays as they are all on the school runs so I can't have any appointments at this time of day unless I want to be stuck in town for a couple of hours the same thing applies any time a plane lands at the airport.

At least twice a week all the wheelchair cars are out of town even if they do not have a wheelchair client in them so I have to wait.

Sometimes I have booked the taxi weeks ahead and they still turn up anywhere up to an hour late making not only me but also my carers late this means that I have to pay my carer overtime from my hours which gives me less hours and puts more strain on my mother who looks after me".

5) Summary of recommendations

It is the view of SCI Australia that the Ministry of Transport needs to do a lot more to bring the NSW taxi industry into line with regards to service levels, response times and overall fair and easy access to the market.

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It is the view of SCI Australia that the nature of these appointments should be open to greater parliamentary scrutiny.

It is the view of SCI Australia that there is an urgent need for the TTSS to be reviewed with the aim of increasing the subsidy percentage from 50% to 75% and increasing the upper limit of the subsidised taxi fare from \$60 to \$100. These positive changes will result in a maximum \$75 subsidy of a \$100 taxi fare, plus the average \$30 taxi fare for a passenger with a disability will result in a \$22.50 taxi fare subsidy saving the passenger \$7.50 per trip. But longer journeys, particularly for those people living in rural areas, would be much more affordable.

It is the view of SCI Australia that the NSW government working with the disability sector conducts a formal feasibility study into the creation of a Universal fleet of taxis. This study needs to commence as a priority. With an ageing population the need for WAT's will grow dramatically over the coming years.

SCI Australia would like to take the opportunity to say thank you for this opportunity to provide feedback on behalf of its members.

Spinal Cord Injuries Australia contact

Sean Lomas, Policy and Advocacy Manager