

Submission
No 25

INQUIRY INTO NSW TAXI INDUSTRY

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20 January 2010

The Director
Select Committee on the NSW Taxi Industry
Legislative Council
Parliament House
Macquarie St
Sydney NSW 2000
taxicommittee@parliament.nsw.gov.au

Dear Sir or Madam

The Council of Social Service of NSW (NCOSS) Transport Policy Advice Group would like to thank you for the opportunity to make a submission to the Inquiry into the NSW Taxi Industry.

Due to NCOSS focus on transport disadvantage we have only addressed four of the Terms of Reference. We believe that there are a range of other organisations that can provide a more detailed response on the other Terms of Reference.

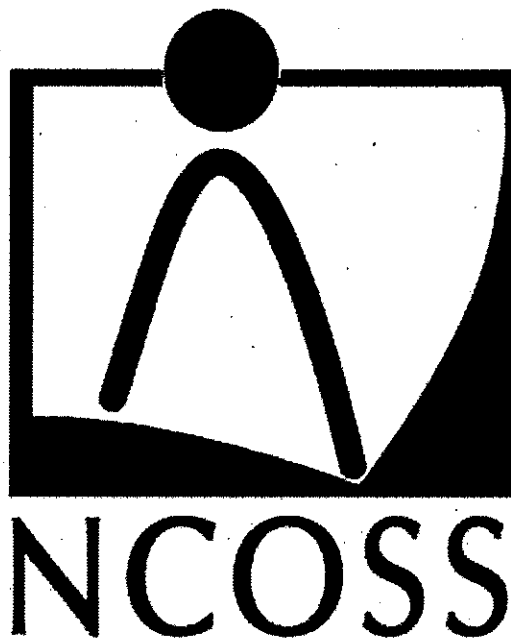
We look forward to a positive outcome from the Inquiry and would welcome the opportunity to participate in further discussions.

If you have any questions please do not hesitate to contact Samantha Edmonds, Deputy Director Policy and Communications on _____ or _____

Yours sincerely

Alison Peters
Director

**Submission to the Legislative Council Inquiry
into the NSW Taxi Industry**



January 2010

Council of Social Service of NSW (NCOSS), 66 Albion Street, Surry Hills 2010

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Recommendations

1. That government reporting standards and regulation, especially in regards to Wheel Chair Accessible Taxis (WATs), needs to be strengthened and continue to be publicly reported.
2. That the Network Standards for taxis in country areas are actually finalised and reporting on Key Performance Indicators for country areas commences and is publicly reported.
3. Taxi driver training is broadened to include training of all taxi drivers (not just WATs) about assisting people with disability.
4. That other measures of service levels for WAT and general taxis, as well as response times, should be recorded and publicly reported. This would provide a more thorough indication of taxi performance. For example it would be very helpful to have information about complaints received from WAT users so that issues particular to these customers could be recorded, such as issues related to loading and unloading.
5. That there are key performance measures introduced for rank and hail taxis and that this includes customer feedback.
6. That the Legislative Council Inquiry refers to the Allen Consulting Group, *Review of the Disability Standards for Accessible Public Transport* (Draft Report, January 2008, Chapter 4) for further details around issues of accessibility of taxis.
7. That WAT response time statistics should be collected for all areas and that the times should be disaggregated and reported publicly.
8. That the Government works with Local Government, the taxi industry and relevant stakeholders to ensure the accessibility of taxi ranks.
9. NCOSS supports the Inquiry in making an assessment of the effectiveness of the Incentive Scheme payment and the level at which it should be set.
10. That the Government investigates the role that taxis can have in demand responsive transport
11. That Transport and Infrastructure (Ministry of Transport) works with the taxi industry and community transport to develop off-peak off-the-meter rates trips for Monday to Friday between 9am and 3pm.

12. The evolution of a universally accessible taxi fleet, which will deliver more accessible services to range of community members.¹
13. A small levy of 20c per trip to assist the industry to adjust to changes, imposed over 5 years to meet the above recommendation. Based on the estimation that taxis in Sydney perform 175 million passenger journeys a year (or 97 million trips per year), a 20c levy could generate approximately \$20m per annum.²

¹ This was Option One from the Ministry of Transport, Wheelchair Accessible Taxi Taskforce, *Interim Brief*.

² Australian Taxi Industry Association, *2007 State and Territory Statistics* (as at 31 December 2007). These are the most recent statistics available on their website, <http://www.atia.com.au/library.php?tab=1>, viewed 11 January 2010.

1. About NCOSS

The Council of Social Service of NSW (NCOSS) provides independent and informed policy development, advice and review and plays a key coordination and leadership role for the non government social and community services sector in New South Wales. NCOSS works with our members, the sector, the NSW Government and its departments and other relevant agencies on current and emerging (and ongoing) social, systemic and operational issues.

NCOSS has a vision for a society where there is social and economic equity, based on co-operation, participation, sustainability and respect.

NCOSS membership is composed of community organisations and interested individuals.

Affiliate members include local government councils, business organisations and Government agencies. Through current membership forums, NCOSS represents more than 7,000 community organisations and over 100,000 consumers and individuals. Member organisations are diverse, including unfunded self-help groups, children's services, youth services, emergency relief agencies, chronic illness and community care organisations, family support agencies, housing and homeless services, mental health, alcohol and other drug organisations, local indigenous community organisations, church groups, peak organisations and a range of population-specific consumer advocacy agencies.

2. About TPAG

The NCOSS Transport Policy Advice Group (TPAG) consists of individuals and organisations that are committed to addressing transport disadvantage in NSW. TPAG identifies systemic issues that emerge for transport policy that affect access and equity for disadvantaged communities. It provides a forum for ideas and discussion on transport issues that may impact on policy. TPAG also provides advice and expertise to NCOSS on emerging issues for the transport sector and on the interests and transport needs of communities. TPAG aims to work with all levels of government to develop effective transport responses with particular focus on the needs of disadvantaged communities.

Current members of TPAG are:

Community Transport Organisation	Western Sydney Community Forum
Northern Rivers Social Development Council	Easy Transport
Cancer Council NSW	People with Disability (NSW) Inc
Lower North Shore Community Transport	Rail, Tram and Bus Union
Public Transport Users Association	Positive Life

3. Introduction

Taxis provide a flexible 24-hour responsive transport mode performing a range of important functions within the greater public transport network. For many passengers, a taxi provides a premium rate alternative to public transport services or the use of a private vehicle. These users are likely to choose a taxi because of its relative speed, convenience or comfort over other transport modes.

There are also a number of passengers who use taxi transport because other forms of transport are not readily available or are not accessible. A significant proportion of these users are people on very low fixed incomes, including older people and people with disability, who use taxis to get to important destinations (including health related appointments).

NCOSS believes that careful regulation and monitoring of the taxi industry is required so that all passengers receive the same level of safety, reliability and service performance.

Due to NCOSS focus on transport disadvantage we have only addressed four of the Terms of Reference. We believe that there are a range of other organisations that can provide a more detailed response on the other Terms of Reference.

4. Terms of Reference

(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

NCOSS Recommends:

1. That government reporting standards and regulation, especially in regards to Wheel Chair Accessible Taxis (WATs), needs to be strengthened and continue to be publicly reported.
2. That the Network Standards for taxis in country areas are actually finalised and reporting on Key Performance Indicators for country areas commences and is publicly reported.
3. Taxi driver training is broadened to include training of all taxi drivers (not just WATs) about assisting people with disability.
4. That other measures of service levels for WAT and general taxis, as well as response times, should be recorded and publicly reported. This would provide a more thorough indication of taxi performance. For example it would be very helpful to have information about complaints received from WAT users so that issues

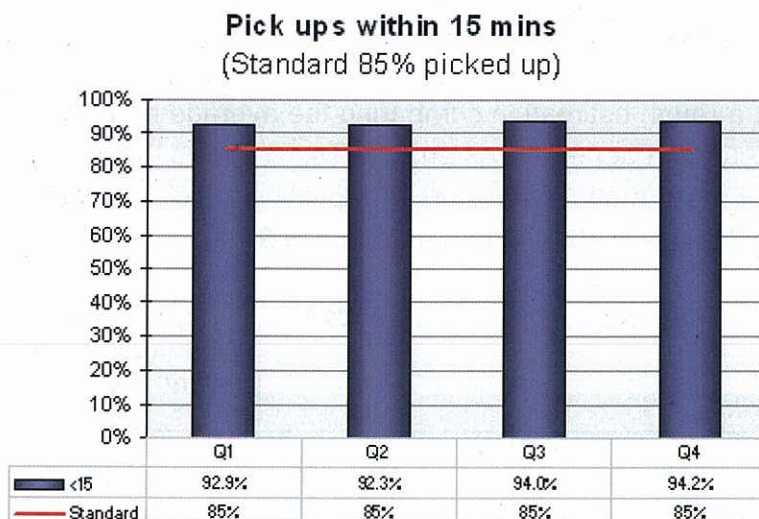
particular to these customers could be recorded, such as issues related to loading and unloading.

5. That there are key performance measures introduced for rank and hail taxis and that this includes customer feedback.

4.1 Taxi Key Performance Indicators

The Ministry of Transport Website provides information on taxi key performance indicators. However the data is limited and it is clear that there is very little transparency around reporting. The key issues are:

- **The questions that guide response to Key Performance Indicators (KPIs) are not available to the public, making analysis of the data difficult.** While data is reported such as the percentage of people picked up within 15 minutes there are four columns Q1 – Q4 underneath. Searching through the Ministry website it was impossible to discover what these questions are. If the questions are available then they need to be located with the KPIs. The only document publicly available is the reporting manual (how to report). Below is a diagram from the webpage as illustration:



- **Data is aggregated.** The available data is aggregated which means that what is reported is the average across Sydney or Wollongong, Newcastle and the Central Coast. It is therefore exceedingly difficult to know if one area is providing a better service than another.
- **Reported data may not include areas.** For example if you read the notes at the bottom of the web page on KPIs for WAT Taxis in Wollongong, Newcastle and the

Central Coast, some of the graphs do not include data from every area. This makes comparison of data difficult.³

- **There is no data about rank and hail taxis and this is often where people have the most difficulties.** During TPAG discussions members reported on a range of issues that they or their members had experienced. This included driver's refusing to pick the person up as it is hand-over time and the person was going in the wrong direction or refusing because the journey is too far or not far enough. One example is of a driver asking the passenger to leave the taxi as he didn't know where Mallett St in Sydney was. He refused to drive any further and the passenger had to leave the vehicle on a main road in the rain.
- **Customer satisfaction must be a key performance indicator.** There appears to be no publicly available data on customer satisfaction.

4.2 Country Taxis

NCOSS is concerned that there are still no finalised Network Standards for taxis operating in country areas. Interim Standards were introduced in 1993 and still remain as interim standards 17 years later.

4.3 Wheelchair Accessible Taxis

Following is a rough estimation comparing the average response times between reporting areas and general taxis and WATs.⁴ It shows that WATs continue to fail to meet the key performance indicators of providing a pick-up within 15 minutes (standard is 85%) and 30 minutes (standard is 98%):

Time	Sydney	Sydney WAT	Newcastle, Wollongong and Central Coast	Newcastle, Wollongong and Central Coast WAT
Pick up within 15 minutes	93.4%	78.1%	93.3%	81.9%
Pick up within 30 minutes	99.3%	95.8%	98.6%	94%

³ NSW Government, Transport and Infrastructure, *Wheelchair Accessible Taxi (WAT) Performance Against Network Standards – Newcastle, Wollongong and Central Coast Networks*, July 2008-June 2009, <http://www.transport.nsw.gov.au/taxi/performance-indicators-region-wat.html>, viewed 14 January 2010.

⁴ This estimation is based on averaging the performance times across each of the Key Performance Indicators reported on the Transport and Infrastructure website.

Given the large volume of evidence available on the inadequate levels of service available to wheelchair users, there is a strong case for enhanced public reporting of the performance of WATs against the current service standards. Performance data should also include the availability of WATs during peak hours in metropolitan and country areas, by measurement of average and median waiting times for services.

While this is not a common occurrence NCOSS is aware that people with assistance animals can face difficulty in obtaining a taxi, especially if they are trying to hail one on a street. The driver notices the assistance animal and then drives past or, if they do stop, refuses access to the animal. It may be that drivers need to be regularly reminded of the requirements of the *Passenger Transport Regulation 2007* (NSW) that states that a driver cannot refuse to carry an assistance animal.⁵

4.4 Passenger Transport Regulation 2007

There are also issues with some aspects of the *Passenger Transport Regulation 2007* (NSW). These are:

Part 8, Section 108(e): this states that a driver of a WAT taxi may only be a person that has undergone training in the care and transport of persons with physical disabilities. This ignores the reality that some people with physical disability also have intellectual disability. Drivers often do not know how to interact with a person with intellectual disability. Training and education would improve the experiences of people with intellectual disability using taxis and enable drivers to provide a better service. It would be positive to see this training expanded to all taxi drivers.

Part 8, Section 148(3): this section enables drivers to deny a hiring by a person using a motorised wheelchair or scooter unless the driver is satisfied that it will be safe, meet the capacity requirements of the taxi-cab, loading equipment and wheelchair restraints. Wheelchair hoists often have capacity limits but how can a driver determine the weight of a wheelchair simply by looking at it? It would be preferable to see the introduction of WATs that are designed to take the heavier equipment so that people are not socially excluded purely on the basis of the equipment they need to provide mobility.

⁵ *Passenger Transport Regulation 2007* (NSW), Division Three, Section 44(4).

(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**

Wheelchair Accessible Taxis (WATs) are a key form of transport for people whose disability means that they need a wheelchair for mobility. In NSW in 2007 approximately 9.9% of the total taxi fleet was WAT taxis, a 4.5% increase from 2001.⁶ However there is a higher proportion of WATs in outer metropolitan, regional and rural NSW (17.2% of the fleet) compared to the Sydney metropolitan region (8.1%).

There is very limited data available on the patronage of WATs by people with disability. What data is available implies that *'the number of taxi trips being undertaken by people using wheelchairs or mobility scooters has been growing'*.⁷

4.5 Disability Service Standards for Accessible Public Transport

NCOSS Recommends

6. That the Legislative Council Inquiry refers to the Allen Consulting Group, *Review of the Disability Standards for Accessible Public Transport* (Draft Report, January 2008, Chapter 4) for further details around issues of accessibility of taxis.
7. That WAT response time statistics should be collected for all areas and that the times should be disaggregated and reported publicly.
8. That the Government works with Local Government, the taxi industry and relevant stakeholders to ensure the accessibility of taxi ranks.

The *Disability Standards for Accessible Public Transport* (the Standards) came into operation in 2002 and a review of their effectiveness is to be carried out every five years. The Standards have a performance measure that requires that the average response time for WATs is the same as the average response time for all taxis. The NSW Government has reported that *'the average response time for WATs booked through the Zero 200 booking service in Sydney is 53% longer than for a standard taxi service'*.⁸ The Draft Report of the *Review of the Disability Standards for*

⁶ Allen Consulting Group, *Review of the Disability Standards for Accessible Public Transport: Draft Report*, January 2008, p.44, <http://www.ddatransportreview.com.au/downloads/ACGTransportReviewDraftReport.pdf>, viewed 8 Jan 2010

⁷ Ibid, p.41.

⁸ Ibid, p.44.

Accessible Transport notes that in Sydney there are WATs 'black spots' (where it was very difficult to access a WAT).⁹

The NSW Government Transport and Infrastructure, *Accessible Transport Action Plan for NSW Transport, Roads and Maritime Agencies* (last updated June 2008) shows that WATs 'did not meet the requirement in the Transport Standards for Wheelchair Accessible Taxi (WAT) response times to be the same as for Standard Taxis by 31 December 2007'.¹⁰ However, statistics show that response times are improving over time. In Sydney in 2006-07 a standard taxi arrived within 7.58 minutes but a WAT took 11.41 minutes. In 2007-08, a standard taxi took 8.35 minutes and a WAT 9.97 minutes (supporting the IPART claim).

It is important to note that response time statistics are only available for the Sydney Metropolitan Area.¹¹

There is also little or no data available about the accessibility of taxi ranks. The Draft Report of the *Review of the Disability Standards for Accessible Transport* notes some key concerns about the accessibility of taxi ranks:

- i. uncertainty about the supply of a WAT at a rank and the possible inaccessibility of the rank
- ii. people with visual impairments reporting problems with patchy and incorrect use of tactile ground surface indicators¹²

It is acknowledged that ensuring accessible taxi ranks is the responsibility of the local government. The Ministry of Transport, Taxi Industry and relevant stakeholders need to work closely with local government to ensure compliance.

Another issue of accessibility is the ability to make a booking. People with hearing and speech impairments also noted difficulties with booking taxis especially if the booking service used voice recognition software.

⁹ At the time of writing this submission the Final Report of the Review of the Disability Standards for Accessible Public Transport, had still not been released.

¹⁰ NSW Government, Transport and Infrastructure, *Accessible Transport Action Plan for NSW Transport, Roads and Maritime Agencies*, 30 June 2008, <http://www.transport.nsw.gov.au/abouttrans/access-trans-action-plan.html#report>, viewed 14 January 2010.

¹¹ *Ibid.*

¹² Allan Consulting Group, *Op.Cit.*, p.48.

(f) The effectiveness of the Wheelchair Accessible Transport Taxi Driver Incentive Scheme in providing better taxi services for people in wheelchairs

NCOSS Supports

9. The Inquiry in making an assessment of the effectiveness of the Incentive Scheme payment and the level at which it should be set.

A system of incentive payments for drivers, \$8.47 per WAT pick-up, was recommended by the Wheelchair Accessible Taxi (WAT) Taskforce and commenced on 1 December 2008. It was to be trialed for an initial 6 month period. The payment has continued and at this stage NCOSS has not seen any outcomes from that trial. The trial was to help improve the waiting times and quality of service by making a WAT pick-up more attractive financially. Has this system been effective? NCOSS advocates that an evaluation of the ongoing trial is needed.

(j) Any other related matters

4.6 Demand Responsive Transport – the Role of Taxis

NCOSS Recommends

10. That the Government investigates the role that taxis can have in demand responsive transport

Because taxis and the bus network systems are managed and regulated by Transport and Infrastructure there is a potential to coordinate the systems to implement Government policy goals. In areas of Sydney where the bus network does not run after-hours or on weekends taxis become the only mode of public transport. This often means low income people are using taxis because of the lack of other mainstream, subsidised by Government, services.

It is interesting to note how taxis are being used in some places in a public transport role as demand responsive, small buses. In some areas taxi operators have developed these services themselves but they are constrained by the structure of the public transport system which doesn't have enough flexibility to encourage demand responsive services. There is scope to develop this work and pricing, particularly for maxi-cabs and multi-fare trips, which may be able to make a contribution to this development.

4.7 Use of Taxis by Community Transport

NCOSS Recommends

11. That Transport and Infrastructure (Ministry of Transport) works with the taxi industry and community transport to develop off-peak off-the-meter rates trips for Monday to Friday between 9am and 3pm.

Over recent years the use of taxis for community transport has increased and it is now common practice for community transport providers to broker journeys to taxis operators. This increases the capacity of community transport by utilising the taxi fleet and enables out of hours and weekend services to be provided to community transport clients. To provide this service community transport allocate funds from their transport budgets supplied from funding programs such as the Community Transport Program, Home and Community Care and Health Related Transport.

A very positive and effective relationship has been developing between the taxi industry and the community transport sector which, we believe, has contributed to a rise in the quality of service provided by taxis.

The community transport sector is, however, looking for opportunities to negotiate day time, off-peak off-the-meter rates trips Monday to Friday between 9am and 3pm. These are the peak periods for community transport and are also identified as the slower periods for the taxi industry. The ability to negotiate rates will make it more affordable for more community transport services to broker trips to the taxi industry and hence benefit the Taxi industry during their slower periods.

4.8 A taxi industry that is completely accessible

NCOSS Recommends

12. The evolution of a universally accessible taxi fleet, which will deliver more accessible services to range of community members.¹³
13. A small levy of 20c per trip to assist the industry to adjust to changes, imposed over 5 years to meet the above recommendation. Based on the estimation that taxis in Sydney perform 175 million passenger journeys a year (or 97 million trips per year), a 20c levy could generate approximately \$20m per annum.¹⁴

The Wheelchair Accessible Taxi (WAT) Taskforce in its *Interim Brief* proposed investigating the possibility that the whole taxi fleet be made accessible. As a result the discrepancies in service standards, fares and the cost of taxi plates would be eliminated. The WAT Taskforce in its Taskforce Report (November 2005) states that they '*acknowledged that the proposal to establish a universally accessible fleet is not appropriate at this time*'.¹⁵ However this does not take into consideration an ageing population. It has been estimated that the population of NSW will increase to

¹³ This was Option One from the Ministry of Transport, Wheelchair Accessible Taxi Taskforce, *Interim Brief*.

¹⁴ Australian Taxi Industry Association, *2007 State and Territory Statistics* (as at 31 December 2007). These are the most recent statistics available on their website, <http://www.atia.com.au/library.php?tab=1>, viewed 11 January 2010.

¹⁵ Ministry of Transport, Wheelchair Accessible Taxi Taskforce, *Taskforce Report*, November 2005.

8.3 million people in 2031. A 'significant proportion of the increase will be people aged 65 and older, who currently make up 14% of the population but will increase to over one in five (22%) in 2031, when there will be 1.8 million people 65 and over in NSW. There will also be a significant rise in the number of 'very old' people, with the number of people in NSW aged 100 years or older expected to increase from 1,000 now to 6,500 by 2026, and 8,200 by 2031'.¹⁶

While not all of these older people will require accessible transport an ageing population does mean that there will be increased numbers of people with disability or other age-related health needs that will need accessible transport.

A small levy, applied to trips, is one way to assist the Taxi industry to make these changes. The levy can be imposed over a 5 year period to subsidise the purchase of accessible vehicles and provide training to drivers to improve competency in providing service to a diverse range of community members. Vehicle replacement subsidies should be prioritised for smaller operators such as owner / drivers.

After the 5 year period, any additional vehicle replacement costs should be carried by the industry without subsidy, with any bona fide cost increases to be considered by the Independent Pricing and Regulatory Tribunal as part of its regular annual fare determination.

Note that consideration of a levy of this kind would necessitate a social impact assessment, with appropriate safe guards put in place for low-income passengers. Currently the taxi industry provides a large number of journeys to low income people (NCOSS estimates that this is in the order of 15 –20 million trips a year). A 20 cent levy will increase transport costs, particularly for frequent users.

5. Conclusion

NCOSS believes that the taxi industry provides a valuable contribution to the public transport system, and is an indispensable transport option for low income people and people with disability.

As noted above NCOSS believes that careful regulation and monitoring of the taxi industry is required so that all passengers receive the same level of safety, reliability and service performance.

¹⁶ NSW Department of Ageing, Disability and Homecare, *Office for Ageing Fact Sheet*, October 2007, <http://tinyurl.com/yauhg8k>, viewed 11 January 2010.

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