

INQUIRY INTO NSW TAXI INDUSTRY

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INQUIRY INTO THE NEW SOUTH WALES TAXI INDUSTRY

Submission to: Select Committee on the NSW Taxi Industry
Response Submitted by: Susan Thompson

1. INTRODUCTION

Vision Australia is pleased to provide comment for the Inquiry into the New South Wales Taxi Industry, on behalf of its clients who are blind, have low vision or are deafblind.

1.1 ABOUT VISION AUSTRALIA

Vision Australia is Australia's largest provider of services to people who are blind, have low vision, or are deafblind. It has been formed over the past several years through the merger of several of Australia's oldest, most respected and experienced blindness and low vision agencies. Our vision is that people who are blind or have low vision will increasingly have the choice to participate fully in every facet of life in the community.

To help realise this goal, we are committed to providing high-quality services to the community of people who are blind or have low vision, and their families, in areas that include early childhood, orientation and mobility, employment, information, recreation and independent living. We also work collaboratively with Government, business and the community to eliminate the barriers people who are blind or have low vision face in accessing the community or in exercising their rights as Australian citizens.

1.2 TAXIS AND OUR CLIENTS

For a great many of our clients, taxis are a vital component in the chain of accessible travel from place to place, and for some, such as those who are deafblind, have additional disabilities or are served badly by other public transport, they are essential to enable maximum participation in the community.

For this reason, Vision Australia is pleased to be able to contribute to this inquiry and to highlight issues which if addressed could greatly improve this important transport service for our clients.

The keys to fully accessible transport can be broadly characterized as ease of use, free of stress, and accountability.

The comments below are aimed at highlighting necessary improvements to ensure that these objectives are met for our clients and others who are blind or who have low vision.

Our clients report time and time again some very positive experiences with both taxi drivers and the taxi co-operatives. Conversely we hear reports of experiences with the taxi industry ranging from frustrating to outrageous!

2. LEGISLATIVE AND LICENSING ISSUES

2.1 CARRIAGE OF DOG GUIDES

Vision Australia is dismayed that despite the 'Disability Discrimination Act 1992' (Cth.); despite the New South Wales 'Anti Discrimination Act', and despite regulations within the New South Wales transport related legislation, we are still repeatedly hearing reports of drivers breaching these laws. Reports include:

- Taxi drivers, once arriving for a booked fare without knowledge of a passenger being a dog guide user, refusing to carry the passenger;
- Taxi drivers being spotted deliberately not stopping for a passenger using a dog guide and assisted by a sighted person to hail a cab; and
- Taxi drivers getting to the head of a rank, pausing and then driving off once they sight a passenger with a dog guide;

In the latter two examples, there is no recourse for a passenger who is unable to see the taxi number or when their sighted companion misses it. This is further exacerbated when that passenger usually then has wait for some time for another taxi.

Vision Australia is encouraged by the knowledge that when the NSW Department of Transport and Infrastructure is able to prosecute (when provided with the taxi

number), the prosecution rate is extremely high. However it should be noted that the process can take a very long time and passengers who are blind or have low vision often feel the impact is lost.

It would seem that adding more legislation would not necessarily improve this in itself. There would be a more significant impact on the taxi driver if demerit points were considered.

In addition, a far more rigorous screening for drivers' knowledge of the legal responsibility to carry dog guides in the licensing process (including compulsory training and re-training) should also be considered.

Recommendation 1:

That consideration be given to implementing a harsher regime providing for greater impact on drivers' licence demerit points for prosecutions related to refusal to carry assistance animals.

Recommendation 2:

That a more rigorous screening process be implemented to ensure a sound understanding by drivers of the legal responsibility to carry dog guides both at initial licensing, and at the time of licence renewals.

2.2 DRIVER COMMUNICATION

Good verbal and literacy communication are important skills for a taxi driver for all passengers.

A sighted passenger may be able to show the driver the directions in a street directory or direct the driver by pointing. Needless to say, these are not options available to a passenger who is blind or has low vision.

Thus, if a driver's verbal communication skills are not strong, in both comprehension and speaking, the passenger who is blind or has low vision can, and all-too-often does, end up 'who knows where'. This passenger finds it difficult to rectify this situation without a great deal of stress and extra money on the meter. Client reports of these incidents include having to spell letter by letter a suburb name and the driver struggling even with the pronunciation of letters.

It would seem that what occurs is that the level of comprehension is sufficient when combined with some visual communication, gestures, practised reading of street signs and some 'good old fashioned' bluffing about whether the driver understands the passenger.

This type and level of communication does not work when good verbal communication is vital. A passenger who is blind or has low vision needs sound two-way verbal communication to establish their location and get directly to their

destination. It also does not suffice where the passenger has difficulty with communication due to being deafblind or having an intellectual disability.

Vision Australia is concerned that in light of our above comments, perhaps the English communication testing in the current licensing process is not sufficiently rigorous.

Recommendation 3:

That the NSW Department of Transport and Infrastructure in conjunction with disability groups reviews the English testing process for sound two-way verbal and written communications skills with regard to the needs of people with particular disabilities.

2.3 LOCATION KNOWLEDGE

It is important that the advent of GPS systems does not see a reduction on the emphasis of testing for location knowledge in the licensing process.

In the absence of the ability to direct the driver, a person who is blind or has low vision should be able to travel just as reliably regardless of whether the GPS is functioning properly.

3. TRAFFIC RULES AND DROP OFF AND PICK UP

3.1 Drop Off

Many people who are blind or have low vision require taxi transport in order to get as close to their destination as possible; in circumstances such as it being an unfamiliar area or difficult environment to travel, or where the passenger requires a little assistance to get into the premises.

In many parts of Sydney in particular, this is extremely challenging for a driver. This is mainly due to the presence of 'no stopping signs' and the risk of high fines. This is understandably a significant disincentive for drivers to provide that little extra assistance to passengers.

We understand there was a trial of the exemption of taxis from these restrictions in the Sydney CBD (except where safety is compromised), but we are not aware whether this trial has been implemented.

To the best of our knowledge, there was a 1 minute restriction on this stopping. This is inadequate in instances where a passenger requires a little assistance to find the lifts in a large sprawly office block. Further, we don't believe it should be restricted to the Sydney CBD, as there are a number of cities and non-metropolitan areas where no stopping is an impediment to taxi drop off, particularly for passengers with disabilities.

Recommendation 4:

That relevant government authorities develop and implement a system of exemption from no stopping and parking restrictions to facilitate the stopping of all taxi drivers to provide assistance to passengers with disabilities.

3.2 PICK UP

Many people who are blind or have low vision require assistance to get from their place of pick up to the cab. This is primarily because they can't see where the cab is parked, and in this age of computerized operations there is no longer the added benefit of the audible radio conversations to provide a clue. Despite a blind or low vision passenger advising the booking operators that they require the driver to come in and assist them to the cab, it is not uncommon for a driver to simply drive off without picking up.

It is our understanding that this likely happens due to no stopping zones in the streets in question, or because the driver believes he is not permitted to leave his taxi. The result is that the passenger is faced with no transport and faces another wait.

We believe that recommendation 4 above is also applicable to this situation.

4. PASSENGER RIGHTS AND COMPLIANCE WITH ACCESSIBLE TRANSPORT STANDARDS

In this section we refer to the:

- **“Rights and Responsibilities of Taxi Passengers”** at: <http://www.transport.nsw.gov.au/taxi/guide.html>; and
- The “Disability Standards for Accessible Public Transport” under the ‘Disability Discrimination Act 1992’ (the DDA Transport Standards)

Part 27 of the DDA Transport Standard set the target of 100% of information to be accessible by the end of 2007. This is inadequate in terms of lack of prescriptiveness, as Vision Australia pointed out in its submissions to the review of those standards. With respect to the taxi industry, we would hold that as a minimum, this includes access to information on taxi meters and access to information about the taxi number.

4.1 ACCESS TO INFORMATION ON TAXI METERS

In this environment of digital technology, and given the relatively finite nature of information on a taxi meter, it should be quite achievable to provide passengers who are blind or have low vision with this information via a talking meter which is always on, and which verbalizes the information displayed in the same way as GPS systems verbalize directions.

Further, Vision Australia believes that until this is achieved, the requirements of the DDA Transport Standards are not being met.

Passengers who are blind or who have low vision are expected to trust that taxi drivers are universally honest about when the meter is on or off, when tolls have been added for the range of road and other additional tolls; and that the correct fare is being quoted.

In addition to being 'less favourable treatment' under the DDA, it is also contrary to the spirit of the 'rights and responsibilities of passengers' referenced above. Namely that "passengers have the right to see the meter". While clearly the right to see can't be granted, the right to access to the information most assuredly can.

Recommendation 5:

That the NSW Department of Transport and Infrastructure in conjunction with other relevant stakeholders (including similar portfolios both interstate and internally) develop and implement a talking meter by the 2012 review of the DDA Transport Standard.

4.2 ACCESS TO TAXI NUMBER

Vision Australia notes that the requirement to provide the large raised numbers on the passenger doors of all taxis required by the DDA transport Standard, required by end 2007, seemed to have been quickly implemented soon after that date.

There is no doubt that this has been a very welcome and beneficial improvement in accessible information for many passengers who are blind or have low vision.

They:

- Provide many people able to recognize printed numbering with the number of the taxi for future reference;
- Provide tactile means to identify the vehicle as a taxi so as to avoid accidentally entering a private car; and
- Enable the passenger to signal to the driver that they have noted their number, thus providing a disincentive for drivers to behave improperly.

However, feed back from clients since the implementation of these tactile large numbers, has indicated that they are not as useful as they might be if they were to include the information additionally in Braille, and to be also located inside the cab.

People who have been blind since an early age who learned Braille, instinctively use Braille as their primary literacy medium, and to access something such as a taxi number in Braille is infinitely quicker than feeling every digit individually and then having to mentally compile the pattern, which for a person whose primary literacy medium was print (due to losing vision later in life) comes naturally.

The tactile taxi numbers manufactured for Queensland, feature the letter designator for the taxi company and the number in large tactile print, together with the same information in Braille. Clients who read Braille by nature, and have had the opportunity to use those numbers as Brisbane residents or visitors from New South Wales to Brisbane, have indicated they felt the Queensland numbers are 'so much easier' because they hadn't learned print letter shapes at school. Vision Australia believes that this should be investigated for taxis in New South Wales.

Recommendation 6:

That the NSW Department of Transport and Infrastructure work with the taxi industry to introduce tactile taxi numbers incorporating Braille, to be installed on taxis at the time of replacement.

4.3 LOCATION OF TACTILE AND LARGE PRINT TAXI NUMBER

Another concern raised by clients is that the location of the tactile number, near the door handle on the passenger doors, as specified in the DDA Transport Standards, is not optimal, when experienced in practice.

Firstly for a tall person with low vision wishing to read the number visually, they must squat down to get close enough to see it.

Secondly, stopping in the rain to read the number which as a person who has low vision does not happen with the same speed as for a sighted person, is certainly not ideal.

Those who can read the numbers tactilely have the option of reading them upside down through the open window once in the taxi, but again this is not an ideal situation.

Many clients have expressed the view that the number should also be somewhere inside the cab.

4.4 CHOOSING THE ROUTE

Clients have expressed frustration with drivers who have chosen routes for them which have, unbeknown to them, incurred road tolls they would not have chosen to take had they been either aware of an alternative (which a driver should have known and advised them of) or plainly without them being able to glean the situation from the meter which does not verbalize information.

In addition to the need for talking meters, this also highlights a general concern about passengers who are blind or have low vision knowing their rights and enforcing them.

4.5 THE 'RIGHTS AND RESPONSIBILITIES' DOCUMENT

It was by chance that a member of Vision Australia's staff alerted our Policy and Advocacy section to this document. This highlights that this document should be available in other formats than HTML on the NSW Department of Transport and Infrastructure's web site. In order for it to be available to the widest number of people who are blind, or have low vision, it needs to be made available in Braille, large print, and audio format both for portability and to cater for those of our older clients who don't have access to the internet.

5. TAXI TRANSPORT SUBSIDY SCHEME

Vision Australia would like to acknowledge the immense benefit to community participation provided by the Taxi Transport Subsidy Scheme to many of our clients since its introduction in the International Year of Disabled People in 1981.

5.1 Indexing of Subsidy

Vision Australia would like to draw attention to the fact that since the introduction of the TTSS in 1981, there has been only one rise in the subsidy cap from \$25 to \$30 in all that time. While at the same time, we have seen fares rise almost annually. While no scheme has limitless funds, Vision Australia views this failure of the government(s) to recognize the rise in taxi fares over many years as significantly eroding the community access benefits for our clients once provided by the scheme. Further, it should be noted that the Victorian TTSS subsidy has recently been doubled to provide for a cap of \$60.

Recommendation 7:

That the NSW Taxi Transport Subsidy Scheme subsidy cap be lifted to a cap which is more in line with today's taxi fares, and that in future, it be adjusted to account for subsequent taxi fare rises.

5.2 INTERSTATE USAGE OF TTSS

5.2.1 TIMELINES FOR OBTAINING VOUCHERS

Clients have expressed frustration with inflexibility of timelines when applying for TTSS voucher books to be used on an interstate trip. Some have expressed concern about being required to provide up to 3 weeks notice, when they only learned of their need to travel a few days in advance. Yet others have quoted having been asked for 10 days notice when making the request and others have received a book within 7 days of the request.

It would seem somewhat inconsistent that the voucher books can get to a scheme participant for use in New South Wales within 7 days, yet the printing and posting of the books for interstate requires as much as 3 weeks notice.

Further, it would also seem reasonable that the time lines for requesting interstate vouchers be a little more flexible in instances of unplanned/unexpected travel.

Recommendation 8:

That the TTSS review its administrative procedures with the view to providing some flexibility in ordering timelines for interstate vouchers for unexpected trips.

5.2.2 CONSISTENCY OF VOUCHER FORMAT

Clients have reported repeatedly that they have experienced difficulty with interstate drivers accepting their interstate vouchers.

It would seem from some reports that a contributing factor may be that an inconsistency in the format of the vouchers across states is causing confusion to drivers.

Vision Australia has not had sufficient time to verify this since receiving the reports.

If this is the case however, perhaps some information provided to drivers in all taxis around the country giving information (images) of acceptable vouchers could alleviate this problem.

Recommendation 9:

That Taxi Transport Subsidy Schemes around Australia consider unifying their interstate vouchers to the extent possible, and

Recommendation 10:

That relevant State taxi regulating bodies provide a laminated card for the dashboard of taxis with illustrations of all acceptable vouchers, including the various states' interstate TTS vouchers, to remain permanently in the vehicle.

5.3 ELECTRONIC PAYMENT SYSTEM

Vision Australia wishes to highlight that a number of people who are blind and have low vision participated in a trial of an electronic payment system (based on a card similar to a credit card) of the Subsidy portion of the TTSS and were very pleased with its ease of use, for both driver and passenger, and acknowledge its potential for decreasing some forms of fraud.

We are also aware that scheme administrators at the time were very happy with what was learned from the trial and the obvious benefits of an electronic payment system.

We note, unfortunately, that this trial took place almost 6 years ago. It would seem that amongst other things the process of developing specifications for a more permanent system was hindered by a rapid series of ministerial changes in the transport portfolio.

Vision Australia is please to note that the revival of the commitment to introducing an electronic payment system is making progress, as we have participated on consultative forums with the department project managers.

We sincerely hope to see the introduction of an electronic payment system without undue delay.

6. NATIONAL SECURITY AND AIRPORT PICK-UP AND DROP-OFF

One significant element of airline travel, affected by '911', is the ability for a person with a disability to have a taxi driver stop their vehicle at the drop off point and get out of the cab to assist them to the check-in or customer service desks.

The current situation is that our clients may sometimes get permission from the parking security staff for the taxi driver to do so, but it is dependent on the good will of the person on duty. It is also dependent on the will of the taxi driver to negotiate with the parking security attendant.

Consequently a person who is blind or has low vision and not familiar with negotiating the airport terminals (not an uncommon situation for people who are not regular travellers), is the potential of being faced with the stressful situation of being left at the door, and trying to seek assistance from a hurrying member of the public to the nearest desk to make contact with airline staff.

While this may not, on the face of it, be directly an issue for taxi industry regulatory regimes, taxis often form the beginning and end of the airline travel experience for a person who is blind or has low vision. Thus Vision Australia is of the view that state transport authorities have a stake in these elements of the journey running smoothly for both passengers and drivers alike.

Recommendation 11:

That the NSW Minister for Transport and Infrastructure and their department work with all relevant state and federal ministers and authorities to find a workable solution to enable a mechanism for the assistance of people with disabilities from taxi to check-in desks at airport terminals.

7. RESPONSIVENESS OF BOOKING SYSTEM

As heavy users of taxis, people who are blind or have low vision invariably encounter instances of long delays for taxis and in most instances no notification of the delay.

One of the most difficult situations where delays occur for our clients is when needing to use taxis for short journeys. When a passenger needs to go to a medical appointment or an unfamiliar address which is only a 10 minute drive, they often

experience greater delays due to the unattractiveness of the fare for taxi drivers. Yet due to their disability, they have no other alternative. Needless to say, these passengers are often being poorly served.

8. SUMMARY OF RECOMMENDATIONS

Recommendation 1:

That consideration be given to implementing a harsher regime providing for greater impact on drivers' licence demerit points for prosecutions related to refusal to carry assistance animals.

Recommendation 2:

That a more rigorous screening process be implemented to ensure a sound understanding by drivers of the legal responsibility to carry dog guides both at initial licensing, and at the time of licence renewals.

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9. CONCLUSION

Vision Australia has prepared this submission in consultation with Blind Citizens Australia (the peak national consumer organisation of people who are blind or vision impaired) and Guide Dogs NSW/ ACT, and believes that, implementation of these recommendations will help to ensure that taxis contribute to the continuum of accessible transport services in New South Wales.

We would be more than happy to provide further information to the committee on any of the recommendations or comments made in this submission.