

**Submission  
No 66**

## **INQUIRY INTO OPERATION OF THE POINT TO POINT TRANSPORT (TAXIS AND HIRE VEHICLES) ACT 2016**

**Organisation:** Vision Australia

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# Vision Australia Submission to NSW Transport and Customer Service Committee Operation of the Point to Point Transport (Taxis and Hire Vehicles) Act 2016

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## Introduction

We are providing this submission to the Committee's inquiry into the regulatory framework for point to point transport in NSW because we wish to draw the Committee's attention to the significant barriers that people who are blind or have low vision face when accessing taxis and, more recently, other ridesharing services. Vision Australia has made numerous submissions over many years, both prior to and after the deregulation of point to point transport in NSW. We have continued to highlight poor service and discrimination by drivers, the absence of an effective complaints mechanism with enforceable penalties, the failure of large taxi companies and most other point to point transport providers to design their websites and booking apps to comply with international accessibility guidelines, and the inability of people who are blind or have low vision to access accurate information about fares because technology such as "talking taxi meters" has never been introduced or even trialled in NSW. The negative impact of these and other barriers has increased since the deregulation of point to point transport, and new barriers have arisen, such as the lack of a "provider neutral" approach to the Taxi Transport Subsidy Scheme (TTSS), which, in effect, gives the users of the scheme, including people who are blind or have low vision, less access to the other modes of point to point transport than the deregulation has made available to the rest of the community. There have certainly been some benefits of deregulation, such as a greater availability of taxis, including during most peak times, and Vision Australia has supported the concept of deregulation since it was first proposed. The positive impact of those benefits has been lessened because barriers have not been addressed at the same time.

As we discuss below, many of our clients now feel less safe and secure when using point to point transport. The COVID-19 pandemic has further highlighted the systemic failure to meet the needs of people who are blind or have low vision. At least two major taxi companies (13CABS and Silvertop Taxis) distributed important information related to safety in taxis via emails that were unreadable by people who are blind or have low vision because they used graphics images rather than plain text to convey the information; we have also received an increasing number of reports of drivers refusing to carry passengers using assistance animals such as Seeing Eye Dogs. Distressing Experiences such as these, occurring during an already extremely challenging time, emphasise the need for decisive action to make point to point transport in NSW safer, more equitable and less discriminatory for people who are blind or have low vision.

People who are blind or have low vision use point to point transport for exactly the same reasons that the rest of the community use private cars: commuting to work, going shopping, taking their children to school, attending sporting, educational or cultural events, attending medical appointments, visiting friends and family, and participating in community activities. Thus, for our clients, using point to point transport is not an optional convenience or luxury, but an essential part of life. Safe and equitable access to taxis and, more recently, other forms of point to point transport has a significant impact on physical and mental well-being, and negative experiences as the result of discrimination or poor service can impact self-confidence in engaging with the community. One of our clients commented:

*“I have had so many taxi drivers refuse to take me because I use a Seeing Eye Dog that I don’t bother to even try to go out anymore – the constant refusals make me feel humiliated and degraded – I deserve better than that”.*

In September 2015 Vision Australia made a comprehensive submission to the NSW review of point to point transport. As part of that review, we also met with the review team. Our submission raised various issues and made a number of recommendations that we believed would ensure that people who are blind or have low vision would not be disadvantaged by the forthcoming deregulation. As far as we are aware, the only recommendation from our 2015 submission that has been implemented relates to the cap on the TTSS M40 vouchers. If our other recommendations had been implemented we believe that people who are blind or have low vision would now be in a better position to benefit from the deregulation of point to point transport in NSW. Overall, point to point transport providers have shown little interest in understanding the needs of people who are blind or have low vision and in removing discriminatory barriers to equal and independent access.

With the notable exception of Uber, no taxi company or other point to point transport provider has sought to engage with us since the deregulation, and unfortunately there is no regulatory requirement or encouragement for them to do so.

In May 2017 we made a submission on the (then draft) Point to Point Transport Regulations. It included seven recommendations which, if they had been implemented, would have created a safer and more equitable point to point transport environment for people who are blind or have low vision.

For many years prior to the deregulation of point to point transport, Vision Australia made a submission to every inquiry pertaining to the Taxi industry. We also met with the Taxi Council of NSW and provided input into the development of the Council’s Code of Practice. Based on the feedback we have received from clients, as well as our own observations, we are compelled to conclude that the issues and barriers that constellate around safety, security and discrimination that we raised in every one of those submissions have largely been ignored by the taxi industry and, subsequently, by government and point to point transport providers.

In the following sections of this submission, we reiterate the most significant of those barriers, and we also provide updated information based on a recent survey that Vision Australia and other organisations in the blindness and low vision sector conducted to obtain feedback from point to point transport users who are blind or have low vision.

## Accessibility of Booking Apps

The major taxi companies and the other point to point transport providers all use smartphone apps as a significant or sole booking option. While traditional taxi providers still maintain a telephone booking system, callers are often encouraged to book through the app if they want “priority service” and access to enhanced features such as GPS tracking and personal driver selection. Booking through an app is the only way of accessing other point to point transport services, such as those provided by Uber, Rydo, Didi, etc.

There are well-attested international guidelines for developing apps so that they are accessible to people with disability, including people who are blind or have low vision. Smartphones based on Apple's iOS or Google's Android system all include accessibility features so that they can be used by people who are blind or have low vision (for example, the Voiceover screen-reader on the iPhone, and Talkback on Android-based phones). These features allow a person to interact with the touchscreen interface on these phones using synthetic speech or braille. Anyone who has an iPhone or an Android-based phone (such as a Samsung Galaxy) can activate and familiarise themselves with these accessibility features, because they are part of every phone "out of the box".

There is therefore no reason why developers of smartphone apps cannot make them fully compliant with accessibility guidelines. When an app is designed to be non-compliant with accessibility guidelines, the impact on users will vary depending on the degree and area of non-compliance. In some cases, an experienced user who is blind or has low vision may be able to use the app for some tasks by finding "workarounds" for the non-compliant design elements, but in other cases the app may be completely unusable.

In preparing this submission we tried to use four of the leading Sydney taxi apps on an iPhone by means of the Voiceover screen-reader. None of them comply fully with the Web Content Accessibility Guidelines (which is an internationally-recognised set of accessibility guidelines that covers both websites and apps) or Apple's accessibility guidelines that are available to app developers. In one case we could register with the app using the Voiceover screen-reader, but we could not select a pickup address. In another app, we could not even register because it was not possible to enter the customer's mobile phone number using Voiceover. The two remaining apps were usable to some extent, but one of them had a considerable number of buttons that were not labelled with text, so Voiceover identified them all by speaking the word "button". One of these "buttons" was for selecting the type of vehicle, while another was for choosing the number of passengers. A Voiceover user would not know this unless they experimented by double-tapping the button to see if anything happened. The other app had unlabelled buttons too, one of which was spoken by the Voiceover screen-reader as "1e1c28C8 3105 44b8 8DC33 3B4A8C". While this sequence of numbers and letters may be understood by the source code of the app, it certainly has no meaning to a human user, and, in any case, a sighted user of the app is not presented with this sequence at all, instead seeing a graphical icon that depicts the button's function. The fact that a Voiceover user has to listen while it is spoken is an example of why the app does not comply with accessibility guidelines.

While some features of some apps may be usable by some people who are blind or have low vision, despite the non-compliance with accessibility guidelines, the impact of having to "jump through hoops" or deal with meaningless strings of numbers and letters when trying to use an app's controls is downright unfair, and would not be tolerated by the rest of the community. It is also completely avoidable, given the ready availability of accessibility guidelines. No taxi company would give a sighted person an app where the only information visible on the screen was the word "button", repeated multiple times. Yet this is exactly the kind of thing people who are blind or have low vision are expected to deal with, because the apps are not developed to comply with accessibility guidelines. When there is no corporate commitment to accessibility, there is, no way of knowing whether the next version of the app will be even more difficult for a person who is blind or has low vision to use. If non-compliance with accessibility guidelines is regarded as acceptable, then there is no limit to how far that non-compliance will be permitted to go.

We have had less feedback about the accessibility of booking apps for point to point transport providers other than taxis. This is largely because most people who are blind or have low vision are not, in practice, able to use these options because the TTSS is not available. We have had considerable engagement with Uber, after they approached Vision Australia in 2014. One positive benefit of that engagement for our clients is that the Uber app seems to be much more compliant with accessibility guidelines than any of the taxi booking apps we have examined, and probably also more than other non-taxi booking apps. Uber are to be commended for being proactive in their engagement with the disability sector generally, and the blindness and low vision sector in particular.

In our 2015 and 2017 submissions we drew attention to the need for a mandated approach to the accessibility of booking apps. Our recommendations in this area were ignored, and our impression at the time was that legislators assumed that “the market” would sort things out: if one app proved to be non-compliant with accessibility guidelines, then people would choose another company that had developed a compliant app, and this would put pressure on the company with the non-compliant app to move towards compliance. However, this assumption has proved to be completely wrong. The reality is that people who are blind or have low vision do not have a meaningful choice, because none of the major taxi companies operating in NSW have demonstrated a commitment to accessibility by developing a booking app that is fully compliant with accessibility guidelines.

There is clear evidence of market failure, and there is therefore an urgent need for the Government to step in and require that all taxi and other point to point transport providers have booking apps that are compliant with all relevant accessibility guidelines. This requirement must be made a condition of being licensed as a point to point transport provider in NSW. Moreover, all point to point transport providers must be strongly encouraged to engage meaningfully with the disability sector to help them identify needs and develop more accessible services.

## Telephone Booking Systems

New entrants to the point to point transport sector often rely on apps to handle all aspects of the booking and payment process. Our impression is that major taxi companies still retain their telephone booking systems, but some have changed them, and others encourage customers to book through an app. Some companies have developed automated booking systems, which avoid the need to wait for a human operator. However, feedback we have received suggests that telephone booking systems, both automated and manual, often do not take into account the needs of passengers who are blind or have low vision.

One of our clients commented:

*“When I use the taxi automated booking option there’s no way I can indicate that I am blind and that the driver therefore needs to look out for me because I can’t look out for him. I’ve had a lot of situations where a driver has turned up but parked down the street and when I didn’t go down because I didn’t know he was there, he took off and I had to rebook with the operator. The downside of booking through the operator is that you can be waiting for 15 minutes in busy times.”*

Another client noted:

*"I called the taxi company and told the operator that I wanted to be picked up from Artarmon. The operator told me that Artarmon is not a suburb in Sydney so their taxis didn't go there. It was hard work convincing the operator that Artarmon is only about 10km from the Sydney CBD and well within the company's service area. Operators used to know what they were talking about, but not anymore apparently."*

Another client observed:

*"I'm finding it hard to use the telephone booking system now because the operators I get have such a poor command of English or such a strong accent that I can't really communicate with them."*

Finally, this comment from another client who uses taxis frequently:

*"If I use the automated telephone booking option I'm not asked for my destination. So what happens is that the driver contacts me as soon as I've made a booking and asks me where I'm going. If he doesn't want to take me he just hangs up. And then I have to try the booking system again. In the past the automated system asked me where I was going, but that seems to be gone, and so has the service".*

Comments such as these have left us with the strong impression that taxi companies are moving away from traditional telephone-based booking systems. Because none of these companies have reached out to the disability sector to discuss the impact of changes in booking processes, the results are being experienced by people who are blind or have low vision as a loss of quality and an increase in the difficulty of simply booking a taxi.

We recommend that all taxi companies, and other point to point transport providers who incorporate a telephone booking option, be required to consult with the disability sector, including the blindness and low vision sector, when making changes to those systems, so as to ensure that they do not have a disproportionate negative impact on people with a disability.

## Lack of Access to Accurate Fare Information

We, along with our clients who are blind or have low vision, continue to be frustrated that there has been no attempt made to provide passengers who are blind or have low vision with accurate, real-time information about the fare to be charged. The only way a person who cannot see the visual information displayed on the fare calculation device (such as a taxi meter) is able to find out the cost of a trip is to ask the driver, and trust that they provide correct information. We have urged the NSW Government on many occasions to introduce "talking taxi meter" technology, similar to that already operating in Queensland, but our recommendations have not been adopted.

The deregulation of fares has made the situation even more difficult for passengers who are blind or have low vision. One of our clients commented:

*"I recently took a taxi trip and at the end the driver told me that the meter showed almost double the estimate he gave me at the beginning. That didn't feel right to me, but I had no way of knowing what the meter really did show apart from the driver telling me. I've been to Brisbane a few times, and it's great there because the meter speaks the fare so I don't have to rely on the honesty of the driver – I can be like everyone else."*

Another client commented:

*"I've lodged a couple of complaints about overcharging by taxi drivers, but at the end of the day I can't prove anything because I don't know what the meter really showed – the drivers know that, and it feels to me like they think they can just charge me whatever they want and get away with it."*

It is worth noting that even if a card-based system replaces the current paper vouchers used in the TTSS, access to accurate fare information will not necessarily be available to taxi passengers who are blind or have low vision.

This barrier does not arise in the same way when using other forms of point to point transport such as Uber, because the fare calculation is done in the app. Provided that the app complies with accessibility guidelines, a passenger who is blind or has low vision can have equal and independent access to this information, and refer to it in the event of a complaint. But as we have noted previously, in the absence of mandated compliance with accessibility guidelines, there is no guarantee that this information will be accessible to people who are blind or have low vision.

## Non-Compliance with Disability Standards for Accessible Public Transport

Taxis are considered to be a form of public transport for the purposes of the disability Standards for Accessible Public Transport (DSAP). Under these Standards, all taxis are required to have raised tactile numbers on the outside of the door so that a person who is blind or has low vision can identify the taxi prior to entering it. While the major taxi companies have always complied with this requirement, we have recently become aware that some new taxis do not have tactile numbers. We assume that individuals and small groups of taxis who are able to operate as a result of the deregulation are not aware of this requirement.

The absence of tactile numbers poses a significant safety risk for people who are blind or have low vision. Firstly, it means that they have no way of knowing whether a car that stops near them is the taxi they have booked or some other car. We do know of instances where a person has entered a car in the mistaken belief that it was their taxi. Secondly, and even if the taxi is known to be a taxi, there is no independent way for a passenger who is blind or has low vision to obtain the taxi's number in the event that they wish to lodge a complaint.

We strongly and urgently request that the Committee recommend that compliance with the DSAP be a pre-condition for obtaining a taxi licence. Further, we request that the Committee recommend that a program of training and awareness be developed and implemented by the Point to Point Transport



Commission or other relevant body to ensure that all taxi drivers are aware of their obligations under the DSAP.

## Disability Discrimination and Poor Service

To inform the content of our and other sector submissions, Vision Australia collaborated with Guide Dogs NSW/ACT and Blind Citizens Australia to produce a short survey designed to obtain feedback from people who are blind or have low vision about their experiences using point to point transport in NSW over the past few years since the sector was deregulated.

The survey was open from Tuesday May 12 until Friday May 15, and it was promoted through email discussion lists, direct client communications, and social media channels. Despite the short availability, the survey yielded 171 responses, which, in itself, is a compelling indicator of the importance that people who are blind or have low vision attach to point to point transport. 60% of respondents use taxis daily or weekly, while 20% use taxis monthly. These figures alone emphasise that any barriers to point to point transport will have an impact on a significant proportion of the blind and low vision community.

The results of the survey provide a disturbing, though not surprising, snapshot of the barriers that people are experiencing when using point to point transport, especially taxis.

A key finding from the survey is that 52% of taxi users who are blind or have low vision report that they have experienced instances of disability discrimination or poor (“less than helpful”) service from taxi drivers. 23% of those have experienced more than 5 such instances during the past 3 years. The survey included options for respondents to make comments, so we were able a detailed understanding of the situations that real people are experiencing. One respondent commented:

*“I called for a taxi to pick me up at a shopping centre underground car park. After waiting for 20 minutes, no one had turned up. I phoned again. I was told I would be priority. I waited a further 20 minutes. The taxi did not turn up. I rang again. I was told they could not find me, even though I did not receive a text or phone call inquiring as to where I was located or informing me they could not find me. After explaining for the THIRD TIME where I was located, I ended up calling my daughter to come pick me up after waiting 1 hour and 15 minutes. All my frozen groceries and dairy products were spoiled. I was very distraught and no further help or compensation was given after my complaint to the taxi call centre.”*

Another survey respondent commented:

*“I have many awful experiences which is why I try not to get too many taxis. I find taxi drivers from other countries pretend they don’t understand me and don’t know where they are going, and take me on longer journey than it should be. I have also been dropped in very unfamiliar areas which is very scary.”*

Feelings of insecurity and lack of safety are a recurring theme in the responses to the survey. It is especially disturbing to read comments like this one:

*“Taxi drivers often drop me at the wrong place. I specifically ask them if we are at the address I asked to be taken to, and they confirm that yes we are, but after they have driven off I discover they have dropped me somewhere else.”*

A number of respondents referred to taxi drivers dropping them at incorrect destinations despite assurances to the contrary. When a person who is blind or has low vision is dropped in an unfamiliar, unexpected or unknown area, their safety can be severely compromised. A client told us in 2018 that a taxi had dropped them off on the road side of a major highway after assuring the client that they were at a hotel. The client could easily have been hit and killed by a passing car as they were acting on deceptive and malicious information provided by the driver.

## Usage of Other Point to Point Transport Providers

78% of respondents to our survey reported using Uber and other non-taxi point to point transport less than once a month. A number of factors contribute to this low level of usage, but in our view by far the most significant is that the Taxi Transport subsidy Scheme (TTSS) only applies to taxis, so for most people who are blind or have low vision, using other options is not financially viable.

Vision Australia and other organisations have been advocating consistently over the last five years for a “provider neutral” approach to be adopted to the TTSS, so that users have the same point to point transport choices that are available to the rest of the community. Given that paper vouchers that must be completed by the taxi driver and signed by the passenger are still used by the scheme, at a time when both the taxi industry and the point to point transport sector more generally have adopted app-based booking and contactless payment, it is hard to see how a “provider neutral” approach could be introduced quickly, but we nevertheless strongly request the Committee to recommend that immediate steps be taken to at least trial the TTSS with non-taxi providers.

One important reason why the availability of the TTSS in other point to point transport would benefit people who are blind or have low vision is that, of those who do use Uber and other non-taxi providers, only 21% report experiencing “less than helpful” service or disability discrimination. While this figure is obviously too high and more must be done to reduce it, it is much less than the 52% reported by taxi users.

Typical comments are:

*“The last few years I have almost exclusively used Uber instead of Taxis as I find the friendlier, helpful and generally more professional.”*

And:

*“Last five times I have been overcharged by taxis. The amount charged does not match the photo of the meter (including all adjustments). Stopped using taxis and will only use Uber now.”*

None of the respondents specifically mentioned other point to point transport providers, so we assume that if people are using providers other than taxis, they are mainly using Uber. The lack of proactive

engagement with the disability sector from other providers, and the apparent lack of any disability-specific initiatives, may account for this.

## Refusals to Carry Seeing Eye dogs and Guide Dogs

Despite decades of legislation making it unlawful for taxis and other providers to refuse to carry passengers accompanied by an assistance animal such as a Seeing Eye Dog or Guide Dog, discrimination in this area still represents a significant barrier for people who are blind or have low vision. About 28% of survey respondents reported using a Seeing Eye Dog or Guide Dog as their primary mobility aid. Based on the number of comments we received about refusals or challenges associated with using these assistance animals in point to point transport, we concluded that almost all dog users have experienced discrimination at one time or another.

One respondent commented:

*“I have had taxi drivers slow down to pick me up and then drive away when they've seen my guide dog (this is partly why I often use my cane instead of my dog when taking a taxi). I have also had drivers who have made a fuss about the fact that my dog has shed hair, even though I'm careful about this and generally put down a protective sheet on the floor for the dog to sit on. One driver even insisted that I get my vacuum cleaner for him when we reached my home.”*

Other respondents commented that both taxi drivers and Uber drivers have cancelled their trips when they become aware that the passenger has an assistance dog. One respondent described how one taxi driver wanted to put the dog in the boot of his taxi. The following comment illustrates just how bullying and aggressive some drivers can be:

*“Taxi driver was very apprehensive about having a dog in his car. When my guide dog licked his dashboard he told me that I would have to pay \$60 to have his taxi cleaned. When I refused to do this he told me that I would have to do this or he would take me to the police station. As I still refused he took me to the police station and tried to complain to the police and get them to fine me on the spot. When the police told him that that was a civil matter he threatened to take me to the small claims Tribunal.”*

People who use assistance dogs as their primary mobility aid do so because it offers them a level of amenity, convenience, equality and independence that is not otherwise available. This is recognised in both NSW and Commonwealth law. It is clear both from the comments we received from our survey, as well as from the frequent similar feedback we receive from clients, that current penalties and complaints mechanisms do not deter taxi or point to point transport drivers from refusing to carry passengers accompanied by an assistance dog.

People who are blind or have low vision will never feel part of the community while they have to endure unacceptable levels of preventable discrimination. Deregulation of point to point transport in NSW has made a long-standing area of discrimination worse. We therefore urgently request the Committee to recommend a much stronger approach to enforcement of laws relating to the carriage of assistance

animals by taxis and other point to point transport drivers, including the development of a more effective complaints mechanism.

## Lack of Effective Complaints Mechanisms

Most respondents to the survey who lodged complaints about poor service or disability discrimination by taxi or Uber drivers indicated that they were not satisfied with the outcome (83% for complaints related to taxis, 82% for complaints related to Uber or other point to point transport drivers). The main cause of dissatisfaction is the perceived lack of action on the part of providers. These comments are typical of those we received:

*“Guide Dog refusal is one I get of course, I have given up reporting to the taxi company 13cabs as they are beyond useless, they don’t have a proper complaint process, one was lost because they couldn’t find the post it note they wrote it on, all others they never seem to find as well and they refuse to provide feedback on outcomes. I had a driver fined for three refusals (I videoed him) by police and a police record showing the same, 13 cabs still wouldn’t do anything about him.”*

And this one:

*“I lodged a complaint about the poor driving to 13 CABS, but heard nothing back from them”*

Another comment that illustrates the lack of confidence in individual company complaint mechanisms:

*“Made a complaint to the taxi company but they didn’t follow up so I had to call the Minister’s office. I was then told the driver was on a warning.”*

A further comment:

*“When I called the office to make a complaint they wouldn’t let me as I couldn’t tell them the taxi number or describe the driver’s face.”*

This comment echoes others:

*“I normally ring the taxi company and give verbal complaint but never hear back”*

As does this comment:

*“I never hear back from any complaints lodged with St George Taxis. Over the years I have used them I have made about five complaints and never once heard back.”*

Respondents also referred to dissatisfaction when lodging complaints with government departments responsible for point to point transport:

*“The complaint was made to NSW Transport Department. I wasn’t informed about any outcome or result of the complaint. I don’t know if anything happened to make individual or systemic change.”*

These illustrative comments could be extended almost indefinitely. Taken cumulatively, they provide strong evidence that the current complaints mechanism offered by point to point transport providers

themselves, as well as by the NSW Government, are simply not working. They afford minimal recourse for resolving issues related to discrimination or poor service, offer no meaningful sanctions for unacceptable driver behaviour, and are ineffective for addressing systemic barriers that are experienced by people who are blind or have low vision when using point to point transport.

Vision Australia and other organisations in the blindness and low vision sector have attempted to discuss our concerns with the Point to Point Transport Commission, but, to our frustration, have been referred back to industry. As the comments above clearly show, industry mechanisms are largely inadequate. We are disappointed that the Commission does not seem inclined to engage with the blindness and low vision sector or to explore its role in helping to reduce barriers that are being experienced by people who are blind or have low vision. We request the Committee to recommend the development of a much more effective and robust complaints mechanism for the point to point transport industry generally, and much greater accountability for individual providers.

### Lack of Driver Training and `Communication Skills

A number of respondents to the survey highlighted the apparent decrease in driver training and English communication skills since the deregulation of point to point transport. One respondent noted:

*“The most common problem I have, with both taxis and Uber, is the lack of English skills that many drivers have - they simply cannot communicate verbally, cannot understand simple sentences or comprehend an address sufficiently to be able to enter it into their GPS - on some occasions it has taken 10 minutes for them to understand an address when I tell them.”*

This respondent directly highlighted the issue of inadequate driver training:

*“Problems with untrained drivers from a non-English speaking background. Training in New South Wales typically only occurs one day for the taxi driver training course. This is surely not enough to ensure that we have competent and reliable taxi drivers.”*

We know that prior to deregulation, major taxi companies worked with organisations in the disability sector to provide disability awareness training for drivers. That collaboration does not appear to have survived deregulation, and, with the exception of Uber, newer entrants to the point to point transport industry appear to be giving little if any attention to how their drivers can learn how to assist people who are blind or have low vision.

We therefore request that the Committee recommend that all point to point transport providers be required collaborate with the disability sector in order to develop, implement and demonstrate effective driver training in assisting passengers with a disability, including those who are blind or have low vision.

### Services in Regional and Rural Areas

Of the 171 respondents to our recent survey, 13% identified as living in a rural area, and 26% said they lived in a regional area. Most (but not all) respondents who provided comments indicated that in general they experienced less discrimination and higher quality services than their metropolitan counterparts:

*“Taxis in rural community are very helpful - no refusals. Very different to the discrimination experienced when living in Sydney.”*

Another comment along similar lines:

*“With the taxis I have used in regional and rural Australia I have been fortunate not to have had a problem. I believe this is because the taxis tend to be small operator operations.”*

This comment continues the theme:

*“I have no problems with my taxi service on the Central Coast. The drivers are prompt & give assistance, especially having my Guide Dog, always good service.”*

But:

*“As the supervisors got to know me in Sydney things were fixed up fast but now out here in the Central West ... I don't know what to do!”*

We are not in a position to comment on how deregulation has affected the viability and sustainability of point to point transport services in regional and rural areas. However, we do wish to draw the Committee's attention to the importance of these services for the blindness and low vision community. Distances to shops, medical facilities and community services are often greater in regional and rural areas, and the relative scarcity of trains and buses means that for many people who are blind or have low vision, using taxis and other point to point transport options is absolutely essential. Any diminution of services in regional and rural areas is likely to have a severe impact on the ability of residents who are blind or have low vision to live independently, undertake essential activities such as shopping and attending medical appointments, and participate in the cultural, sporting and recreational life of the community.

It is important that point to point transport services in regional and rural areas are able to continue and flourish. It is also important, however, that these services are subject to the same requirements as those in metropolitan areas, such as adequate driver training, robust and effective complaints mechanisms, and compliance with accessibility standards and guidelines.

## Conclusion

The following comment, which we received from one survey respondent, provides a succinct summary of the widespread view among people who are blind or have low vision when reflecting on the deregulation of point to point transport in NSW:

*“I feel much less safe in both taxis and Uber vehicles than I used to, especially in taxis, given the pervasive lack of English communication skills among drivers, a complete and slavish reliance on GPS rather than their visual view of the surrounding environment, an almost universal lack of*

*training in how to interact with blind people, and the absence of a robust and effective complaints mechanism. I cannot identify a single benefit that the new point-to-point transport regulatory framework has produced for me. Added to the ongoing inaccessibility of the major taxi booking apps, changes in telephone booking procedures that make it harder and more time-consuming to book a taxi, failure to enforce the Disability Standards for Accessible Public Transport insofar as they require tactile numbers on taxi doors, and it feels to me like we have taken several steps backward in terms of accessibility and inclusion with this new framework.”*

As we noted previously, there have been some tangible benefits of point to point transport deregulation, such as greater availability of taxis. However, because of the pervasive and often long-standing barriers that many people who are blind or have low vision still experience, the positive impact of such benefits is often overshadowed, and there is a widespread view that the deregulation of point to point transport in NSW has so far failed to bring any significant benefit to people who are blind or have low vision. Legislative and regulatory frameworks and oversight have not addressed the discrimination, disadvantage and inequitable access to services that people who are blind or have low vision continue to experience.

Developments in technology and service offerings do not automatically benefit people who are blind or have low vision unless they are founded on principles of inclusive design and delivery. So far, point to point transport providers have largely failed to demonstrate any meaningful commitment to access and inclusion in the way they design and deliver their services.

Vision Australia requests that the Committee use the important opportunity of this inquiry to recommend the introduction of mandatory accessibility requirements for all booking apps, a much more robust and responsive complaints mechanism with more stringent penalties for refusing to carry passengers with assistance dogs such as Seeing Eye Dogs, enforcement of compliance with relevant provisions of the disability Standards for Accessible Public Transport, and the development of an effective consultative mechanism between point to point transport providers and the disability sector.

We would be pleased to provide any supplementary information that would assist the Committee in its consideration of the issues we have raised in this submission.

## About Vision Australia

Vision Australia is the largest national provider of services to people who are blind, deafblind, or have low vision in Australia. We are formed through the merger of several of Australia's most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision is that people who are blind, deafblind, or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision, are deafblind or have a print disability, and their families.

Vision Australia service delivery areas include: registered provider of specialist supports for the NDIS and My Aged Care Aids and Equipment, Assistive/Adaptive Technology training and support, Seeing Eye Dogs, National Library Services, Early childhood and education services, and Felix Library for 0-7 year olds, employment services, production of alternate formats, Vision Australia Radio network, and a national partnership with Radio for the Print Handicapped, NSW Spectacles Program and Government Advocacy and Engagement. We also work collaboratively with Government, businesses and the community to eliminate the barriers our clients face in making life choices and including fully exercising their rights as Australian citizens.

Vision Australia has unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 26,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of our organisation. Vision Australia is well placed to advise governments, business and the community on challenges faced by people who are blind or have low vision as well as they support they require to fully participating in community life.

We have a vibrant Client Reference Group, comprising of people with lived experience who are representing the voice and needs of clients of our organisation to the board and management.

Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment. Vision Australia also has a Memorandum of Understanding with, and provides funds to, Blind Citizens Australia, to strengthen the voice of the blind community.