

Submission

Taxi and Hire Vehicle Industries Regulations 2023

Attention: Manager Legislation and Compliance
Department of State Growth

This submission recognises that inclusive transport is an enabling factor for people with disability to live a full and independent life.

The significance of transport as a mechanism for inclusion has been recognised by the Commonwealth Government in the Australian Disability strategy under the outcome area 'Inclusive homes and communities', Transport systems are accessible for the whole community as noted in policy priority 5.

The regulatory impact statement does include some initiatives that enable people with disability to have better taxi services by mandating a minimum number of taxi trips by service providers. Specifically, the WAT requirements are a move towards better service to the market.

There are however a number of issues that remain unclear and require addressing.

Below are the areas that I believe need to be addressed in order for the initiatives raised for People with Disability to work effectively.

Driver Shortage

I note that driver shortages have been and continue to be an issue within the Taxi Industry. I also acknowledge that the Government has previously provided support to the industry to attract and retain drivers.

In order for the target of 30 trips to be satisfied, service providers will require a sufficient number of drivers to be available at all times of the day and week to ensure the target number of trips are satisfied.

Would a requirement of service providers be that they have an appropriate number of drivers available and sufficiently trained to ensure that the target number of trips made will be satisfied and ideally exceeded.

Training

This area is significant, not just in terms of safety for People with Disability but also excellent customer service. Communicating effectively with people is key to making people feel welcome and comfortable and enhance the experience.

Is there provision that training encompasses not only safety requirements such as locking and ties down the wheelchair but also communication that ensures drivers are welcoming to their clients.

I understand the above is currently outside the scope of the current draft It is however imperative that these issues are addressed as a matter of priority.

Non- Compliance

This is integral to ensuring that initiative noted in the RIS are not only implemented but also actioned.

I trust that the appropriate department will be properly resourced to ensure that measures are satisfied.

The current process of the complainant having to initially engage with the service provider, is ineffective and often does not result in a meaningful resolution to the problem. The onus being on the customer to try and resolve an issue, especially when there are a number of issues involved isn't equitable or fair for the complainant.

I applaud the minimum number of WAT trips per month initiative. It is unclear how this will be monitored. Will it be the number of pre- bookings and fares? I note that log book are to be phased out so, what measures are being investigated to ensure that this requirement is being satisfied?

The reporting of the targets for WAT needs to be transparent and as such, should be publicly available. Service providers who fail to meet the standards/targets should have to publicly note there reasons for being unable to do so.

Costs

It is my view that any changes as a result of this review and update are not passed onto the consumer. If fares are to increase this would entrench the disadvantage of people with disability who rely on this service to actively participate in society.

In the event that fares do increase users of the transport subsidy scheme should not be disadvantaged.

Option 3

In regards to the Options available, option three is preferred.

Summary

In summary, the draft RIS is a good step in the right direction not just for the industry but also the consumer, in particular People with Disability, specifically wheelchair users.

Whilst some of the issues raised above are outside the scope of the current process, it is imperative that the issues raised are reviewed, assessed and incorporated into any further review. Ideally the current review and consultation can be broadened to incorporate issues surrounding customer service, attract and retain drivers to the industry and that any compliance issues are dealt with effectively.

There are areas raised in the RIS that require further discussion and exploration as noted above and would welcome the opportunity to discuss further.

Regards,

Richard Witbreuk

