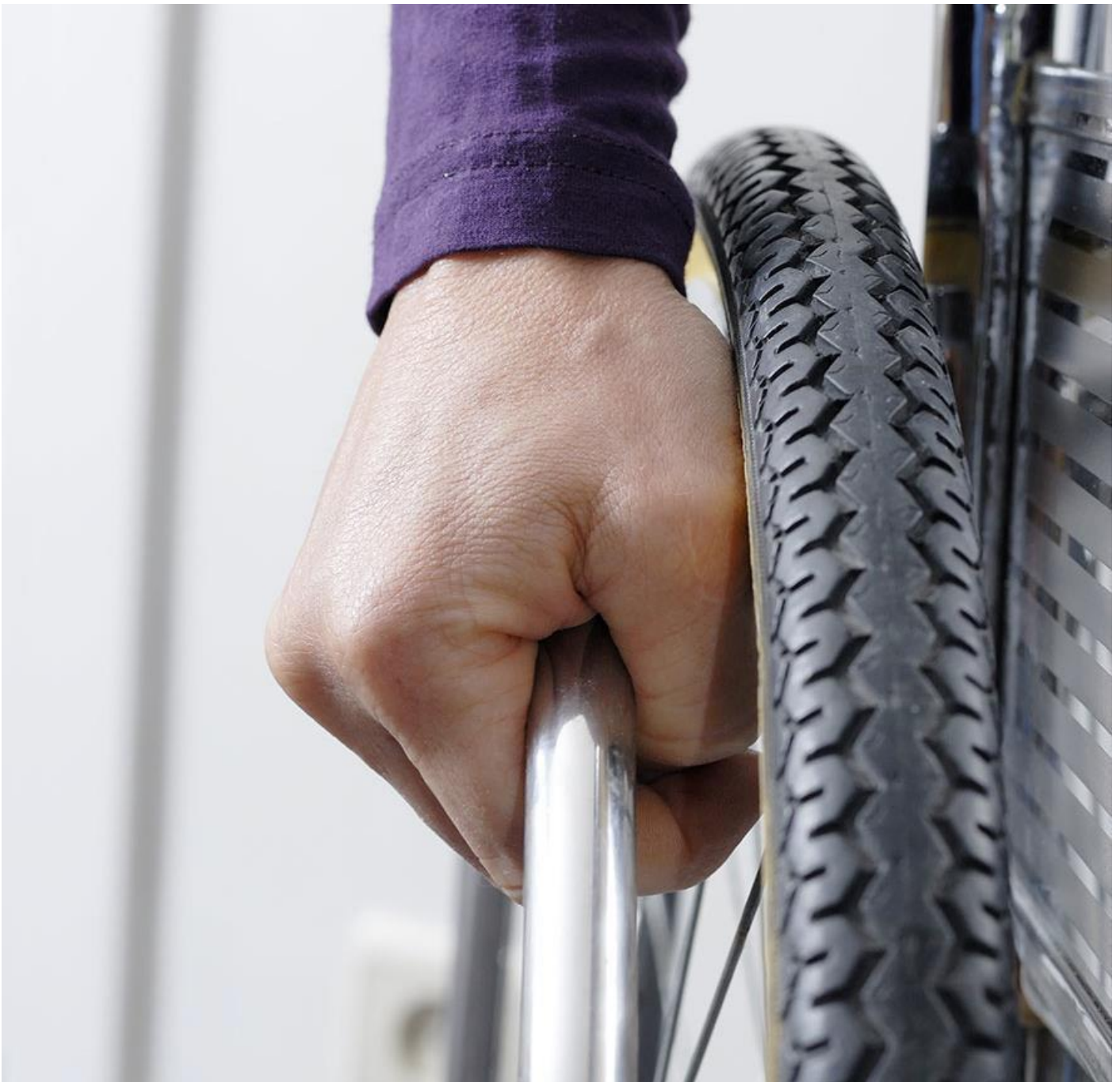


## IPART Review of maximum fares for rank and hail taxi services in NSW



## Background and Context

Spinal Cord Injuries Australia (SCIA) welcomes the opportunity to respond to the IPART *review for maximum fares for rank and hail taxi services in NSW*. Point to point transport is critical for our 3000 members, many of whom have limited or no alternative options for transportation. Whilst alternative rideshare options are available to the general public, they are usually not accessible to wheelchair users and therefore affordability is critical.

As a member-based organisation, we have the experiences of our 3000 members; as the contracted provider of the Transport for NSW, Wheelchair Book and Ride service we understand the complexities of the industry; and, as a *for purpose* organisation with strong metropolitan and regional connections we are uniquely placed to contribute. Over the last three months we have been gathering stories and considering innovative approaches to service provision.

Our response focuses solely on *Question 9*. In our experience, there are multiple factors that impact the sectors willingness and ability to offer wheelchair accessible services. Much of the information in the submission below has also been shared with Transport for NSW in July 2024 submission regarding innovation in the sector. We understand this review is only focused on “rank and hail” taxi services however in some cases we have included background information about the booking service as we believe it falls within the “other matters” section of the Terms of Reference and directly impacts on the sectors willingness to offer a wheelchair accessible taxi service.

## About Spinal Cord Injuries Australia

SCIA has been providing a dedicated advocacy service for people with spinal cord injuries and similar disability since 1967.

We currently employ 200 staff across services nationwide including 13 staff dedicated to our Advocacy work in New South Wales, metro, and regional areas and 12 staff in the Wheelchair Book and Ride service.

SCIA provides specialty knowledge in Spinal Cord Injury, and other neurological conditions, and broader knowledge and experience across physical disability. SCIA was founded by people with acquired spinal cord injury in 1967. Today people with disability still largely lead our organisation. People with disability make up 35% of our employees and a further 25% of employees have a close family member with disability. Over 50% of our board have disability and we represent 3000 members across Australia, with a majority having a spinal cord injury or neurological condition.

SCIA also operates the Sydney metro area Wheelchair Book and Ride service on behalf of Transport for NSW through a booking system that operates via a stand-alone ‘Driver App’. SCIA’s goal operating the service is to deliver high quality customer service to passengers, and, with 47% of Wheelchair Book and Ride service employees having a disability, the service is genuinely operated by people with disability for people with disability.

The Wheelchair Book and Ride service team understand passengers, drivers and Taxi Service Providers and we have used this knowledge and the experience of our members and Advocacy Team to inform our response to Question 9.

**Question 9: What factors are impacting the sector’s willingness and/or ability to offer a wheelchair accessible taxi service?**

### **SCIA Member Perspective**

SCIA works with people who have permanent and complex disability. In a 2020 consultation, members noted that over the past decade people with disability, particularly wheelchair users have improved access to ferries, trains, trams, and buses. However, people with disability are still often reliant on a point to point services. The critical importance of point to point services cannot be understated. Most wheelchair users are unable to use ride share services, many do not drive their own vehicle and public transport may be either inaccessible (for example private bus routes) or difficult for out of the way appointments or visits. Thus, many wheelchair users rely solely on point to point transport to participate in their communities. Including work, social or education.

In recent years members have reported frustration and disappointment because of missed appointments, including long awaited medical appointments, missed social occasions such as Christmas lunch or Mother's Day and delays for collection of up to 7 hours. As an organisation that is built on the vision for people with disability and their loved ones to thrive, SCIA is passionate about seeking workable solutions with to will enable our community to have access to reliable, affordable, and safe point to point transportation services.

Member comments reflect three key issues:

1. Taxis are late or fail to arrive.
2. Drivers refuse to take short distance fares.
3. Drivers request dockets, don't use smartcards, or make demands on passengers that are outside the regulations.

*"Drivers often ask for dockets that I am no longer able to get and have refused to take me if I don't have dockets or ask for extra payments".*

*"Taxis refuse to take me short distances, they often don't stop and drive by despite the booking being made".*

Wait times and driver shortages are common and particularly concerning in small regional towns. Members in regional areas report that there may be less than two wheelchair accessible taxis in their area and when the single wheelchair accessible taxi is not available, they are unable to go out.

### **SCIA Book & Ride Perspective**

SCIA runs the Wheelchair Book and Ride service and we have collected data which provides important insights into the service. From June 2023 to June 2024, 62% of bookings were unfulfilled with the driver app standing alone, however with the manual dispatching offload required to other providers, the unfulfillment rates show at 42%. Without a fully integrated Centralised Booking System, Wheelchair Book and Ride service teams cannot access drivers.

One of the major issues is that there are insufficient taxis on the road to meet demand and additionally, some drivers prefer not to collect people for short trips because they can make significantly more money collecting large groups of people and, whilst it is a condition of the licence that wheelchair users be prioritised, there is no penalty for failing to comply.

Analysis of the completion rates from in 2023/24 highlight this. SCIA's Wheelchair Book and Ride service data shows that if a fare is \$15 or less the completion of the job is 26% however the completion rate increases as the fare estimate increases. If the fare estimate is \$50 or more, completion rate is 51%. Whilst this data does apply specifically to booked service provision, we believe that the same experience occurs to "rank and hail" wheelchair users, particularly as many members inform is that taxi's just "drive past".

Wheelchair Book and Ride service Team Member comments reflect the primary barriers impacting service is:

- The lack of available wheelchair taxi's

- The price disincentive to pick up wheelchair users when group bookings are significantly more profitable.

**Recommendation:** all policy considerations should start with the assumption that the provision of services to wheelchair users is the most important operational responsibility of a Wheelchair Accessible Taxi.

**Recommendation:** enforce compliance regulations regarding prioritisation of wheelchair users for drivers with Wheelchair Accessible Taxi plates.

### **Driver and TSP Perspective**

To better understand how we can improve our service and negotiate the high numbers of unfulfilled bookings, the Wheelchair Book and Ride team have been engaging with taxi drivers and Taxi Service Providers.

Much of the consultation response from drivers and Taxi Service Providers focussed on the need to have an integrated State-wide Centralised Booking System instead of a separate “driver app” to improve communication and reduce double bookings. Our research found that 63% of drivers do not engage with the “driver app”. The detailed analysis is not included as it falls outside of the scope of the Terms of Reference, however the poor communication is a significant disincentive to drivers offering a wheelchair service that extends beyond the booking system to the “rank and hail” services as well.

Drivers also referenced a financial disincentive to collect wheelchair users as they are motivated by (an understandable) desire to make personal income.

In a recent survey to Taxi Service Providers, we found that, of the six respondents:

- Four said there were no penalties in their bylaws for drivers not accepting wheelchair passengers.
- There was a strong preference amongst those who responded for the ‘Driver App’ to be integrated into the existing fleet dispatch system (a centralised Booking System) and for its use to be mandated.
- Taxi Service Providers felt that while some do the ‘right thing’ others do not - creating an unfair system.

Taxi Service Providers believed that a system was required that enforced Wheelchair Accessible Taxis to transport wheelchair users as a priority.

Issues that exist in Sydney metro are even more significant in regional areas. Members in regional areas report that there are usually only two, one or no Wheelchair Accessible Taxis in their area. This increases isolation and reduces participation for people with disability.

Additional barriers to service include:

- Reimbursement for the Driver Incentive Bonus when using the smartcard is the responsibility of the TSP and driver payment can sometimes be delayed or not reach the driver at all. This is a common issue in regional areas.
- Clarity between the responsibilities of Transport for NSW and the Point to Point Commission in terms of regulation is needed.

### **Developing Driver and TSP incentives for the appropriate use of Wheelchair Accessible Taxis.**

The important step of increasing the funding for Wheelchair Accessible Taxi driver/operator interest free loans in 2017 has not been supported by incentives to use the Wheelchair Accessible Taxi vehicle for its intended purpose. The existing incentive for a wheelchair booking of \$15.00 (plus GST), while improved from the original \$7.50 (plus GST) is insufficient to offset the incentive of driving a large group a similar distance.

The establishment of an independent 'Driver App Booking System' is commendable however because the supporting infrastructure has not been fully implemented the provider (SCIA's Wheelchair Book and Ride service) has limited ability to reach drivers and fulfil bookings for wheelchair users who need to use the service as a priority. The issue is primarily caused by the development of a separate 'Driver App' rather than integration with the existing booking and dispatch system, resulting in a lack of engagement, and meaning the Wheelchair Book and Ride service team have a limited ability to access the drivers when needed.

Whilst the Wheelchair Book and Ride service is the 'approved' Wheelchair Booking System, it runs in competition with the legacy service. With the lack of availability of Wheelchair Accessible Taxis and the long wait times, clients now book through both companies with the hope of 'getting a ride'. This leads to frustration with long wait times and drivers arriving to find a rider has already left in another Wheelchair Accessible Taxi. These regular incidents erode the good will of Wheelchair Accessible Taxis to service people with disability.

Additionally, because use of the Wheelchair Book and Ride service 'Driver App' is not mandated for use with a Wheelchair Accessible Taxi plate, it is incumbent on Taxi Service Providers to self-regulate the prioritisation of collecting wheelchair using passengers. This self-regulation is unlikely to succeed in the point to point transportation environment where the rapid change has increased Taxi Service Provider and driver feelings of financial vulnerability.

Some Taxi Service Providers have a greater commitment to fulfilling the (non-enforceable) requirement to prioritise passengers with disability resulting in industry frustration between those regularly fulfilling their responsibilities and those who may not do it as frequently. Strong government regulation is required to create a level playing field in this area.

Compounding the availability issues are the costs associated with the payment terminal for the use of the Taxi Transport Subsidy Scheme Smartcard have acted as an additional disincentive for installation creating a two-tier system where drivers continue to ask for Taxi Transport Subsidy Scheme dockets and the benefit of the Smartcard is not fully realised.

### **Boosting the Number of Wheelchair Accessible Taxis**

The fleet of Wheelchair Accessible Taxis has decreased by 291 in NSW over the past 5 years, meaning that there are not sufficient vehicles to service the community. Addressing the number of drivers is an important first step.

The right mix of incentives can significantly boost driver supply.

- a. Data. We know that there is an increasing prevalence of disability<sup>1</sup> in NSW and this will further increase as our population ages. However, drivers, particularly drivers in regional areas, do not know the prevalence of disability in their area. At the July 2024 Regional Roundtable on Wheelchair Accessible Services in Orange regional Taxi Service Providers noted that they didn't know how many wheelchair users were in their communities. Improved data mapping allowing Taxi Service Providers to understand their clientele would enable regional providers in particular, to better service their areas.
- b. Grants. Despite the increased limit on interest free loans, there remains a significant investment for a driver to adapt and maintain a WAT vehicle (including initial modifications and ongoing maintenance of hydraulic ramps). The Queensland government offer grant funding for drivers wishing to adapt a vehicle. Adoption of an appropriate grant incentive program would remove the financial risk for drivers.

**Recommendation:** review the availability of, and information about, no interest loan schemes for WAT

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<sup>1</sup> Australian Institute of Health and Welfare, People with disability in Australia 2024

vehicles and explore the possibility of a grant scheme to better incentivise and support drivers to invest in a Wheelchair Accessible vehicle.

**Recommendation:** fully implement Taxi Transport Subsidy Scheme smartcard operation in all Wheelchair Accessible Taxis with no fee for set up of service or monthly cost if driving a Wheelchair Accessible Taxi plated vehicle if wheelchair user are collected as a priority.

**Recommendation:** regulate mandatory preference for wheelchair users as a condition of a drivers Wheelchair Accessible Taxi licence and the Wheelchair Accessible Taxi licence, with penalties enforced by the Centralised Booking System operator or Point to Point Commission for failure to comply.

**Recommendation:** continue to operate thorough a single independent Booking System provider, external to the industry.

### **Improved Incentives and Stronger Regulation**

**Recommendation:** SCIA recommends a focus on improved incentives and a stronger regulatory framework alongside consultation with the industry.

Improved incentives and a stronger regulatory framework can:

- a. Place people with disability at the heart of the decision-making process incorporating the principles of the United Nations Convention on the Rights of Persons with Disabilities to which Australia is a signatory.
- b. Incentivise the Taxi Service Providers and drivers to address existing gaps.
- c. Lead to innovation in service provision that increases the number of drivers available, particularly in regional and rural communities.

**Recommendation:** empower drivers through incentives including:

- Explore the option of paying incentive payments directly to drivers
- Incentivising the hours of Wheelchair Accessible Taxi operation, for example overnight shifts when there they are most needed or the number of collections of wheelchair passengers.

**Recommendation:** Investigate further Wheelchair Accessible Taxi incentives that can make accepting fares for wheelchair users' income equal for drivers compared to group bookings to remover the cost disincentive of using the licence appropriately. Ensure incentives are extended to all authorised point to point transport providers.

## **Conclusion**

SCIA in its position as member organisation and contracted operator of the Wheelchair Book and Ride service, an authorised Booking System provider is acutely aware of the pressure points in the industry and the need to act collaboratively to support the industry, drivers, and wheelchair users.

The United Nations Convention on the Rights of Persons with Disabilities promotes and protects the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities. For wheelchair users who rely on accessible taxis as their primary and, in many cases, only method of transport having a service that is safe, reliable and affordable is the only way they can participate in their communities.

SCIA believe that success for passengers and operators can be achieved through addressing each of the above recommendations with particular focus on improved incentives and regulation of the industry to support both driver and wheelchair users.