

Blind Citizens Australia



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**Essential Services  
Commission: Draft Report  
Taxi Fare Review 2007-2008 –  
Recommendations by Blind Citizens Australia**

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**Prepared for the use of:**

Taxi Fare Review  
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## **About us**

Blind Citizens Australia (BCA) is the peak national advocacy body of and for people who are blind or vision impaired. Our mission is to achieve equity and equality through our empowerment, by promoting positive community attitudes and by striving for high quality and accessible services which meet our needs. As the national consumer body we have over 3000 individual members, branches nationwide and around 13 affiliate organisations that represent the interests of blind or vision impaired Australians.

BCA provides individual and systemic advocacy on a range of issues, direct consultation to government and public and private bodies, peer support through our network of branches Australia wide and information dissemination through publications. For more information about BCA please visit [www.bca.org.au](http://www.bca.org.au).

## **Essential Services Commission: Draft Report Taxi Fare Review 2007-2008**

Taxi services are essential in fostering the safe and independent travel for people with a disability to health services, social activities and the community more generally. We would like to acknowledge the work undertaken by the Essential Services Commission (the Commission) and commend the Commission for highlighting areas of improvement which are cognoscente of the needs of people with a disability. As an organisation which has a key interest in improving the equality of people who are blind or vision impaired, we wish to comment on a number of the recommendations within the review.

### **II Approaches to setting path prices**

The frequency in the use of taxis by people who are blind or vision impaired is very much dependent on cost. Whilst acknowledging the rising costs to taxi operators, we note that the CIPI-X will have direct implications for people with a disability who receive welfare entitlements, people on low incomes and other marginalised

individuals. Welfare entitlements and income increases are linked to CPI (in fact low income earners may not receive CPI at all), leading to greater financial disadvantage, vulnerability and social isolation.

In a climate of rapidly rising fuel prices, concerns abound about the ability of people on welfare and those on low incomes to be able to afford basic living costs, including transport. This is all the more relevant in regions where community and public transport availability is limited or non-existent. We note the fine balance between the need for a sustainable taxi industry which can continue to operate and fares that are not cost prohibitive.

Taxis are only part of the transport matrix. We note that if fares must increase in order for the industry to remain financially sustainable, there must be government commitment to implement social policy to address the social disadvantage directly resulting from inevitable fare increases. This includes the provision of adequate, affordable and well located public transport options, as well as alternative options to taxi travel which is flexible and can provide a pick up and drop off door to door service in metropolitan, regional and rural areas. Transport concessions or alternative support initiatives should also be considered as part of government social policy to rectify the balancing act.

Furthermore, as noted in the 2006 Country Taxi Review, there are concerns about the financial viability of operators in rural and regional Victoria where population sizes are small; 34 towns currently served by taxis are considered financially unsustainable in terms of patronage. As the Commission puts it: "Were those towns to lose their taxi operators, it is improbable that they would be replaced. The risk that such communities might not have any form of public transport must be a concern". We note that this is another area of government policy which needs to be examined, with direct consultation undertaken with municipalities, shires and communities to develop outcomes that are responsive to community needs.

## **III Fare Structure Issues**

### **Booking fee**

In line with the Victorian Council of Social Service (VCOSS), BCA asserts that fare structures should contain a balance between providing incentives to drivers to undertake short trips through the fixed flag fall rate whilst simultaneously ensuring that those undertaking short trips do not bear the weight of disproportionately high fares. Many people who are blind or vision impaired undertake short trips to access medical facilities, local shops and social activities. We note that the proposed increase in the booking fee, coupled with the decrease in the flag fall rate, is higher than the current rate and may cause slight hardship to some individuals who are blind or vision impaired.

**There may be merit in exploring whether the taxi meter should be integrated with the despatch systems of primary or secondary networks, so that the booking fee can only be added to the meter for pre-booked hire.**

We support this recommendation as the integrating of despatch systems minimises the likelihood of driver fraud. For example, a totally blind individual was charged a booking fee as part of his cab fare, despite being picked up from a taxi rank. He only realised the error days later when he spoke with his daughter and showed her his Multi Purpose Taxi Program (MPTP) receipt.

## **IV Surcharges**

### **Premium Service Surcharge**

Anecdotally, we are aware that many people who are blind or vision impaired prefer to hire a taxi directly through a driver they know. Where this does not occur, the next preference is the use of a premium service, as they are perceived to provide a better level of service than 'off the street' hires. We recognise that it is important for

premium service operators to have a permit to assist in the monitoring, regulation and operation of the system.

As noted in the review, the Premium Service Surcharge is not covered by the MPTP, due to a “desire by policymakers to not cover the cost of what is ostensibly a choice on the part of individual consumers to enjoy a higher quality service”. We note that this response completely disregards individuals who have specific needs but do not require a wheelchair accessible taxi (WAT) service where more direct, tailored service is provided. A premium service implies that the driver has significant experience, is trusted by the operator to deliver high level customer service and is familiar with providing assistance and specialised service to people with disabilities; services which are not consistently provided in the regular fleet.

We note that for some people with a disability, using a premium service is not “a choice” but a decision borne of equity and safety. For example, a person who is deafblind (who has dual sensory loss of deafness and blindness) may not feel safe using a conventional taxi for fear of being overcharged, being driven to their destination via a longer or indirect route, being unable to ‘speak up’ for fear of being told to exit the car, concern of personal danger and the inability to communicate (which might be exacerbated by a driver who is not familiar with the specified route and has poor communication skills).

**Recommendation: BCA calls for a review of premium services to**

- a) encourage operators to increase the amount of vehicles within their fleet which offer a premium service (thereby providing incentives to drivers who have served in the industry for longer periods) and**
- b) conduct a review on the suitability of including premium services into the MPTP to assist individuals who have special needs which extend beyond the service provided by conventional taxis.**

We note that increased disability training for conventional taxi drivers and other drivers within the system will also help to improve service standards.

## **V Distribution of income**

**Increasing the number of licences to achieve specified performance targets or according to a market mechanism. Preferentially directing these to experienced drivers.**

We support initiatives that promote driver retention within the taxi network and encourage long term drivers to continue to work in the industry. In particular, driver retention has a significant impact on the quality of services received by people with a disability, with issues including insufficient local knowledge and familiarity of the network, communication issues (particularly when drivers are from a non-English speaking background) and awareness of laws and customs including attitudinal responses to people with a disability and acceptance of assistance animals in taxis. This also highlights the need for owners and operators to take greater responsibility and accountability in ensuring that accredited drivers are sufficiently trained in these areas and provide adequate levels of service to all passengers.

### **Enhanced driver training requirements**

We support the view expressed by VCOSS to ‘improve retention of skilled drivers and increase the financial viability of providing additional training to drivers who transport passengers with additional needs (including conventional cabs)’.

We note that drivers of conventional taxis currently do undertake driver training, with a small component (approximately 30 minutes) on disability. BCA asserts that this is insufficient in providing the contextual and practical understanding of disability, different disability types, specific needs, how to effectively communicate with people with specific disabilities, customer service and assistance. Driving a taxi is only one part of the equation.

As an example, we have heard that drivers have expressed concern that passengers have not mentioned that they would be travelling with an assistance animal when booking a taxi. We note that as per the *Disability Discrimination Act 1992*, assistance animals must be accepted in public premises, including taxis. Furthermore, we note that there is no prerequisite for the disclosure of an assistance animal; a view which is also supported by the Victorian Taxi Directorate (VTD). This is one example of the lack of awareness amongst drivers of obligations under equal opportunity legislation.

We note that driver education about disability and in customer service must be extended significantly, with a several fold increase in current levels, to ensure that drivers are aware of their responsibilities. Furthermore, refresher training on a semi regular basis (six monthly or annually) should also be considered to ensure that drivers continually update and refine their skills. In facilitating this program, it is recognised that this is an extra cost which would most likely be borne by operators. We note that an equal responsibility also extends to the State Government to improve services to people with a disability as per policy statements, such as *A Fairer Victoria* and improve overall customer satisfaction which is in decline.

**Recommendation: Driver awareness to be extended significantly, with refresher training also undertaken on a semi regular basis. As part of increased driver awareness, an awareness component regarding assistance animals and obligations by drivers should be included.**

## **VI Information gathering and performance management**

**A taxi industry performance monitoring report should be developed, and published every six months. This would include a broad range of indicators relating to booking service waiting times, wheelchair service waiting times, customer satisfaction,**

## **complaints statistics, and other information identified in Chapter 8.**

We strongly support this recommendation. We agree with the Commission's preliminary view that a wider set of findings should be available and note that all suggestions noted in the Review should be incorporated within data collection. This includes overall customer satisfaction with taxi services and elements of the service, and information regarding the number of people wanting to make complaints, those who have made complaints and satisfaction regarding complaint handling. In addition, we strongly support the need to collect information directly from MPTP and wheelchair users regarding their experiences to improve the system.

To illustrate this point, BCA presented anecdotal information to operators and the VTD of high levels of non acceptance of assistance animals in taxis. However, this could not be substantiated through complaints data, as many dog guide owners would choose not to report a complaint. The reasons for not lodging complaints were

- complaints were not resolved to the individual's satisfaction
- fear that the driver knew where they lived and would seek possible retribution
- that drivers would "get a slap on the wrist" and continue to perpetuate the problem or
- that they would not be listened to in the first place.

Whilst many of these issues are being addressed through a working group auspiced by BCA with the VTD, this demonstrates the importance of collecting specific information from those who use the MPTP as the issues experienced often extend beyond generic customer service.

We strongly support the recommendation that customer satisfaction surveys encompass the views of people living in regional and rural areas to ensure a statewide approach. We also support targeted sampling of MPTP and wheelchair users to statistically determine satisfaction levels between regular users and those with a disability.



**Key Performance Indicators (KPIs) should be developed that focus on a range of service quality measures from customer satisfaction to overall industry efficiency and profitability. These measures should be indicators of the adequacy of the supply of taxi services in meeting demand, sustainability within the industry and overall trends in performance over time.**

We agree with this generic recommendation, however we disagree with a sub-recommendation of this review. As noted in 8.3.3, there is a view to implement one set of KPIs for conventional taxi services, WATs and MPTP based on targets for conventional taxi services. Whilst BCA notes that this will provide consistency in performance standards reporting across different user types, we contend that KPIs for conventional taxi services do not encompass the full range of needs of people with a disability. For example, individuals with a disability may have needs that extend well above generic customer assistance (communication needs, direct assistance to the vehicle etc). Reporting standards must also have some flexibility to ensure that people with a disability are not characterised under the one banner. This can have benefits in implementing service improvements for people with disability specific needs. We note that more targeted performance standards which are cognoscente of disability should lead to better service outcomes for all users.

**Recommendation: The development of KPIs which are inclusive of the needs of people with a disability should be developed with peak disability bodies to ensure that service standards across the taxi network are appropriate.**

**The complaints process should be accessible to those with a disability. There should be the ability for complaints to be made in writing, by phone, by email or even by SMS. The process for making a complaint should be clear and information made available as to what the process is.**

We strongly agree with this recommendation. Our experience is that many people are uncertain of who to lodge a complaint with,

whether their complaint will be dealt with seriously and the lack of follow up when complaints are made. The second and third points are particularly relevant in regional and rural areas, where there may only be one taxi operator who may not seek a resolution to a complaint or, worse still, make it difficult for the individual the next time they book a trip. As one individual noted, 'I don't bother making a complaint because I know that Tom\* (the manager) won't take it seriously and no one else will do anything about it'.

Information should be provided in plain English to ensure that people with print disabilities or those from a culturally and linguistically diverse background are able to understand and use the complaints process. Furthermore, we note that information regarding the complaints process should be made available in accessible formats including large print, audio, Braille and via electronic means, with websites meeting W3C accessibility guidelines and information provided in Word versions in addition to PDF. This is particularly relevant when noting the difficulty experienced by a totally blind individual who was unable to complete the online complaints form on the VTD website as it was not compatible with screen reader software (which reads information on the screen audibly) and was then told by VTD staff that he could not lodge his complaint over the phone.

**If performance monitoring reveals that there are significant differences in the level of service being provided to WAT users and other taxi customers, further WAT licences should be released until this difference is removed.**

We agree and believe that this is a necessary step forward.

## **VII Affordability and Availability**

### **Examine options to reduce red tape in the application process for MPTP membership**

Anecdotally, we are aware that individuals who are blind or vision impaired as well as others within the community find the application

process to be confusing and lengthy. For example, individuals who are borderline legally blind (eyesight within the range of 6/60 which is the demarcation line between the acceptance and non acceptance of applications by the VTD) may or may not receive the MPTP based on the report provided by their medical practitioner. We strongly agree that the application process for the MPTP should be reviewed to ensure that the application form can be readily accessed and understood by a wide range of audiences, including people with learning and/or intellectual disabilities as well as by those who may have a disability and originate from a culturally and linguistically diverse background.

### **Provide for temporary membership for people who are temporarily disabled and required to use a wheelchair**

We support the notion of temporary membership to the MPTP, however we believe that limiting temporary membership to those who only have a physical mobility restriction is short sighted.

For example, BCA are contacted by many individuals who border on legal blindness but fall short of the legal classification. Many of these individuals experience the same barriers to travel as do their legally blind counterparts: they are unable to access public transport independently, unable to take up local subsidies such as HACC services due to inconsistent criteria between municipalities and are often marginalised due to affordability issues and where they reside.

In addition to this, we note that there are no taxi concessions for seniors who are no longer able to drive and do not have ready access to transport. This is particular problematic for our target group, as blindness and ageing are strongly correlated, as is the onset of additional disabilities. Furthermore, anecdotally we are also aware that many individuals who are losing their sight at a progressive rate are reluctant to (and often choose not to) cease driving unless an accident or near accident occurs. The implementation of such a scheme not only assists in facilitating the independence of older Victorians, but has wider implications on road safety, health and mobility.

Furthermore, temporary membership should also be considered for those who are undertaking treatments that are potentially debilitating and travel minimising (cancer treatments are one example) that are not necessarily covered through the direct physical inability to walk.

We strongly support the Commission's claim for the need to review the MPTP to ensure that the full intent of the scheme is not lost.

### **Retain the MPTP benefit level at 50% of the fare**

We strongly contend that this is a must to ensure people with a disability are not further marginalised.

### **Reconsider the government position on previous proposals to increase the maximum trip subsidy to \$50**

We note that this recommendation does not go far enough to rectify the inequality experienced by people with a disability living in outer suburban, regional and rural areas.

Residential choice regarding where to live and proximity to well established public transport connections have been severely impacted by rising house prices and interest rates. This is further exacerbated by high unemployment rates amongst people who are blind or vision impaired (approximately 63% compared to the national average of 5%) leading to increased social isolation, limited choice and higher transport costs comparatively. The reality is that people have to travel by taxis for further and for longer, when public transport is infrequent or not a viable and accessible option.

Of our 1000 members in Victoria, a large proportion is dispersed in the outer fringes of Melbourne and in regional and rural areas. Anecdotally we are aware that many of these individuals are experiencing high levels of social isolation. Travel costs can also be significantly higher.

**Example:** Lorraine has recently received an Executive Assistant position with a printing company in Melbourne. Lorraine is thrilled as

this is her first full time position. The only thing curbing her excitement is the thought of traveling from Cranbourne to Melbourne twice daily to get to her new employment. Lorraine is keen not to lose this position as she is aware of how many applications she has submitted and the rejections she has received which she knows is probably a result of her disability. She knows that she will be out of pocket as her fare will be above the threshold amount and must consider whether she can complete the role. Public transport is not a viable option as the trains often have incorrect audible information and have not been equipped with accessibility features.

We note that this issue is more predominate in regional and rural areas, where alternative transport options are limited or non-existent. One member specifically noted that she has limited the amount of taxi trips that she undertakes due to the costs of taxis. As noted in the draft report, 24% of taxi fare revenue is from MPTP members in regional areas. This provides a strong business case to argue that the maximum dollar trip subsidy amount does not address the complete picture and discriminates against people who live in regional and rural areas.

Rather than apply a \$50 maximum trip subsidy, we note that it would be beneficial to apply a flat rate maximum trip subsidy of 50% of the fare. This is financially viable when considering that the majority of MPTP trips are below \$60 (as noted by the Country Working Group) and that the MPTP program is currently underspending in comparison to its budget. Furthermore, we note that there is a business case for the need to increase the breadth of the MPTP due to an increasing ageing population and the growth of “sea change” and “tree change” moves to regional and country areas.

We note that Dol’s statement regarding the sufficiency of a \$30 cap is limited in appraising the needs of regional and rural residents, particularly when taking into account that customer satisfaction surveys only survey those living in metropolitan areas.

**Recommendation: The maximum trip subsidy should be increased to a flat rate of 50% of the fare, in metropolitan, outer**

**suburban, regional and rural areas, in place of the proposal to increase the maximum trip subsidy to \$50.**

In addition, we support the findings of the Country Taxi Review which call for the Government to develop a taxi scheme for users (similar to the MPTP) to be implemented “in locations without local public transport services, and available to persons who would otherwise have access to transport concessions if public transport were available”. Looking exclusively at vision impairment, there are approximately 120,000 people in Victoria who experience some form of public transport disadvantage and affordability constraints. We note that there should be a commitment from the government to implement a review of this initiative.

**A several fold increase in the annual MPTP subsidy cap should be considered.**

We note that there are many inconsistencies within the criteria for eligibility to the MPTP. For example, whilst many individuals on the MPTP are subject to an annual cap, individuals who are legally blind are not capped on the amount that can be spent on taxi fares annually. We note that there needs to be greater equity within the program to ensure that individuals are not further disadvantaged because of their disability type in MPTP funding.

We support the views of the Commission in calling for an increase “by several orders of magnitude” and note that many individuals are currently restricting their participation within their community as a direct result of annual capping.

### **Wheelchair accessible taxis**

Whilst the availability of wheelchair accessible taxis does not have a direct impact on the bulk of our membership, we lend our support to the Commission’s recommendation for the availability of “an additional 330 metropolitan WAT licences...to raise the proportion of WATs in the metropolitan taxi fleet to 15%”. We maintain that a 15% target sets an appropriate starting point.

## **Community transport**

We support the Commission's preliminary recommendation for a review of community based transport systems in Victoria, particularly when considering the State Government's commitment to improve social inclusion. We also support the recommendation made by a number of stakeholders to examine shared ride taxi services as an alternative form of public transport. We agree that such transport could successfully operate along bus route corridors at scheduled times and provide a door to door pick up service, where traditional bus services are underutilised or non existent.

## **VII Broader considerations**

We believe that the broader considerations outlined successfully balance the needs of users and drivers. We wish to support all 7 recommendations and assert that these objectives are highly relevant for the taxi industry.

## **Other considerations**

### **Pre-booking arrangements**

We are aware through information provided by the VTD that passenger taxi bookings are only released to the taxi driver network twenty minutes prior to the time the passenger requires to be picked up. Our understanding is that this also applies to bookings of WATs. We note that this poses an equity issue for people with a disability for the following reasons

- a) due to the shortage of WAT taxis, the release of booking information only twenty minutes prior to pick up can lead to greater waiting times and in some instances, unavailability of a taxi for the time needed
- b) there are implications for people with other disabilities who have specialised needs. For example, as noted earlier, a person who is deafblind may request a premium service from a taxi provider to ensure that there are treated with dignity and will receive direct assistance from the taxi driver to enter the

vehicle and to communicate. Due to the shortage of registered premium service providers, there is no guarantee that the client will be picked up at the desired time, or will be able to access a premium service altogether.

A review of releasing booking information earlier than the twenty minute timeline currently implemented should also be explored.

**Recommendation: Booking information for WATs and premium service bookings should be released earlier than what is current practice to allow taxi drivers to better co-ordinate availability, reduce waiting times for passengers and improve efficiency and services for people with special needs.**

## **Final comments**

We would like to commend the Essential Services Commission for providing a detailed review into taxi fares and improving taxi services. We do however note our disappointment that the draft review was not provided in accessible formats and electronically in a Word format (PDF formats are unable to be read by screen reader software). We note that this is important to enable people who are blind or vision impaired to access the review and provide input as a user. We encourage the Commission to provide all future materials in an accessible format.

We encourage the Commission to adopt the recommendations outlined in this paper and welcome the release of the final review into taxi fares.