



Physical Disability Council of NSW
Ordinary People Ordinary Lives

Submission to Transport for NSW
Transport Disability Incentives and Subsidies Review Discussion
Paper

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Who is the Physical Disability Council of NSW?

The Physical Disability Council of NSW (PDCN) is the peak body representing people with physical disabilities across New South Wales. This includes people with a range of physical disability issues, from young children and their representatives to aged people, who are from a wide range of socio-economic circumstances and live in metropolitan, rural and regional areas of NSW.

Our core function is to influence and advocate for the achievement of systemic change to ensure the rights of all people with a physical disability are improved and upheld.

The objectives of PDCN are:

- To educate, inform and assist people with physical disabilities in NSW about the range of services, structure and programs available that enable their full participation, equality of opportunity and equality of citizenship.
- To develop the capacity of people with physical disability in NSW to identify their own goals, and the confidence to develop a pathway to achieving their goals (i.e: self-advocate).
- To educate and inform stakeholders (i.e: about the needs of people with a physical disability) so they are able to achieve and maintain full participation, equality of opportunity and equality of citizenship.

Introduction

The Physical Disability Council of NSW (PDCN) appreciates the opportunity to review and provide comment to Transport for NSW on the discussion paper for the Transport Disability Incentives and Subsidies review.

PDCN acknowledges the important role the taxi industry and other point to point transport services play in providing people with disability with a mode of transportation. PDCN believes it is essential that accessible transport services are available across NSW to facilitate greater access, inclusion and participation of people with disabilities in the community.

PDCN consistently identifies that many individuals with disabilities have no access to public transport such as trains, bus or light rail due to a lack of accessible services or infrastructure and practical barriers preventing their utilisation. In many parts of NSW, particularly rural and regional areas accessible transport options available for people with disabilities are limited to modified private vehicles, community transport services and wheelchair accessible taxis. The incentives and subsidies administered by Transport for NSW are essential in creating an environment in which people with disabilities can afford to access the point to point transport services that they require to achieve full social and economic participation in the community.

PDCN would like to highlight that facilitating access to transport is a pertinent issue given the roll out of the National Disability Insurance Scheme (NDIS) across NSW. The NDIS has seen a transformation in the way disability services and supports are funded and accessed, with the aim of providing individuals with disabilities greater choice and control over the supports they receive.

At its foundation the NDIS seeks to increase community participation for people with disabilities and support individuals to be active participants in education and employment.

PDCN believes the economic benefits to the Australian economy and GDP that will come from the increased social and economic participation of people with disability, as a direct result of better targeted support from the scheme, should be supported by initiatives that provide and support access to transport.

PDCN would also like to highlight the importance of affordable, accessible transport with good connectivity as without access to transport there are barriers present in the community that prevent people with disabilities from accessing employment, education, medical appointments, social opportunities, community resources or from visiting friends and family. Passenger subsidies for people with disabilities also address the greater levels of economic disadvantage experienced by this cohort.

In reviewing this discussion paper PDCN suggests transport for NSW address the lack of reliable, comprehensive and up-to-date, qualitative and quantitative data on the subsidy and incentive schemes, and the broader usage of transport by people with disabilities. PDCN is concerned that the discussion paper only references statistics from a wheelchair accessible taxi customer research report from 2013. PDCN recommends Transport for NSW undertakes current research with TTSS participants and individuals with disabilities who do not access the scheme, in order to properly examine the effectiveness and adequacy of passenger subsidies and other incentives.

Taxi Transport Subsidy Scheme

PDCN employees, members and stakeholders utilise the Taxi Transport Subsidy Scheme (TTSS) as both M40 and M50 participants for a variety of purposes including travelling to and from medical appointments, social engagements, shopping, attending events (shows, sports and festivals) and for commuting to educational facilities or work.

PDCN believes the scheme is of unquestioned benefit to people with disabilities and fully supports the continuation of the TTSS in the future. Nevertheless, PDCN feels the current voucher system is problematic and would like to comment on issues that frequently arise from the use of paper travel docketts.

PDCN has observed many TTSS users are unable to complete the vouchers independently due to their physical disability. In many cases at the end of a trip the individual is in a position where the driver must sign and complete payment on their behalf. This leaves the system open to financial abuse by drivers and may place the TTSS user in a vulnerable position, with many reporting that they feel uncomfortable to raise an issue with payment or misuse of vouchers.

Furthermore, many TTSS participants have reported their driver having difficulty completing the vouchers, the process of completing vouchers being very time consuming. In addition, TTSS users indicate they still encounter WAT drivers who have no knowledge of the TTSS and are reluctant to take the vouchers as part payment for the journey. PDCN is concerned by the lack of disability specific training and awareness of the subsidy scheme by drivers of WAT services.

The paper docket system has been reported as being particularly inadequate for individuals with a vision impairment as they are unable to see the voucher and how it is being used. PDCN

would be pleased to see the introduction of an electronic smartcard system as will be discussed later in this submission. PDCN believes there would be great benefit in introducing a card similar to the multi purpose taxi program (MTPT) card that has been in use for many years in Victoria. We feel this may also assist scheme participants by negating the need for the cumbersome administrative process currently required to reorder the paper docketts.

Wheelchair accessible travel **The Driver Incentive**

PDCN believes there is a lack of data to confirm if the increase in the wheelchair accessible taxi driver incentive to \$15 from the 1st of July 2016 has led to a significant change in the responsiveness of drivers to WAT jobs. PDCN is concerned that despite the incentive there remains an insufficient number of WAT services in some areas, long wait times and difficulty securing a WAT service for short distances.

In addition, PDCN does not believe that the payment of the driver incentive for TTSS users has negatively affected responsiveness for wheelchair users who are not scheme participants. However, PDCN has received feedback from WAT service users who are not TTSS participants that customer service may be impaired by the driver incentive. A small number of PDCN members have reported that drivers are hesitant to take their job or discourteous when completing a job due to not receiving the driver incentive payment. PDCN feels the expansion of subsidies and incentives to other point to point services and mandatory disability awareness training across all point to point transport will have a positive effect on the standard of customer service provided by WAT drivers.

PDCN has found some individuals who are eligible for the TTSS are unaware of the scheme, or being more infrequent users of WAT services have deemed it too difficult to apply. Greater promotion of the scheme and a streamlining of the application process will ensure wheelchair users do not miss out on passenger subsidies and drivers will have the extra time required for completing these trips properly compensated.

In addition, PDCN is aware that WAT drivers will frequently have the meter running while loading the wheelchair into the vehicle and fixing restraints. This practice adds significantly to the cost of the overall trip and is raised by wheelchair users as an issue as they feel they are making a double payment for the service and have few options in this situation, particularly given the scarcity of accessible services.

Recommendation 1: Transport for NSW expand the TTSS to enable subsidies to be available for use on any point to point transport journey.

Recommendation 2: Transport for NSW implement mandatory disability awareness training across all point to point transport services.

Recommendation 3: Transport for NSW invest in greater promotion of the TTSS scheme.

Recommendation 4: The application process for the TTSS should be streamlined to ensure eligible participants do not miss out on subsidies.

WAT Interest Free loan scheme and Free Wheelchair accessible taxi licences

PDCN is adamant that WAT services should prioritise jobs for wheelchair users in all circumstances given the inability of wheelchair users to access regular taxi services and the proportion of WAT services to regular taxis. PDCN believes the accessible taxi interest free loans scheme and the free WAT licences have been important strategies in increasing the number of WAT services operating in NSW. However, despite these incentives it has been observed that the numbers of WAT services has remained stagnant and in some areas there is still an inadequate supply of wheelchair accessible services.

PDCN has observed the additional cost of purchasing and modifying a vehicle remains a substantial barrier to new wheelchair accessible taxis entering the market, particularly in rural and regional areas. PDCN recommends additional government support and subsidies could be implemented to address unmet transport needs, particularly outside metropolitan centres. PDCN suggests that Transport for NSW target incentives to ensure the provision of WAT services to the population size, at a minimum of 1 WAT per 10,000 residents.

We would also suggest further subsidies could include a discounted rate provided to operators on the licence fee for their regular services if they establish a WAT service in areas, or bordering areas where there has been an identified absence of wheelchair accessible vehicles.

PDCN believes the provision of accessible point to point transport services should be prioritised despite views by some transport providers that a competitive advantage may be given to community transport operators. PDCN feel that increasing accessible services is in the best interest of individuals with disabilities who are entirely reliant on point to point transport services and live in areas where there may be zero WAT services or an extremely limited number of WATs. The transition to the NDIS has resulted in the removal of substantial funding previously provided to community transport. This may have long term effects on the financial viability of services which have played a vital role in meeting the transport needs of the community.

In addition, as community transport provides affordable services to many different segments of society, including the elderly, not all community transport vehicles are accessible. Extending access to the interest free loan scheme to community transport operators may be an effective strategy to enable the modification of more community transport vehicles and increase access to much needed accessible services.

Recommendation 5: Transport for NSW target incentives to ensure the provision of WAT services to the population size, at a minimum of 1 WAT per 10,000 residents.

Recommendation 6: Transport for NSW institute further incentives such as discounts on the licence fees for regular service to encourage existing operators to establish new WAT services in rural and regional areas.

Recommendation 7: Access to the interest free loan scheme be extended to other service providers, including community transport.

Subsidised centralised booking service

In PDCN's experience many people with disabilities prefer to privately book WAT services directly with drivers with whom they feel comfortable or have built an ongoing relationship. PDCN members describe many benefits to making private bookings including reliability,

avoiding long wait times for services and not having to worry about travelling with a driver who has inadequate training in loading and fixing the restraints necessary for the safe and comfortable transportation of an individual who is a wheelchair user.

Despite the preference for pre-booked services, the centralised booking system remains the most common way in which WAT services are arranged. PDCN has frequently used the centralised booking service and our experience has been very positive with the service found to be efficient and easy to navigate.

Prior to the establishment of the central booking service PDCN often encountered difficulty in securing WAT services for shorter distances, such as the distance from our office in Glebe to Sydney Central railway station. These bookings were often not filled despite several calls to taxi operators. This issue has been reduced by the booking service offering a greater pool of available accessible vehicles.

PDCN believes that the Australian taxi industry needs to comply with the Commonwealth Disability Discrimination Act 1992 by providing response times for accessible vehicles at similar response times as standard taxis. The centralised booking system is an important step to achieving this and ensuring equitable access for wheelchair users.

Passenger Subsidies and Pricing

PDCN supports the expansion of the TTSS to enable subsidies to be available for use on any point to point transport journey. This change will provide TTSS users a greater level of choice as it will increase the number of wheelchair accessible vehicles that can be directly and simply booked by wheelchair users in NSW. The National Disability Strategy supports the greater provision of accessible transport as a core component in promoting two of its policy goals, the importance of facilitating educational and vocational goals¹, and the importance of promoting community inclusion for people with disability².

PDCN agrees with Transport for NSW that the lack of competition in regional and remote areas is a concern as it may inflate the cost of point to point transport services and make accessing services unsustainable for people with disabilities, despite subsidies. PDCN would like to see maximum prices be regulated in areas with a less competitive markets. This could be done alongside greater subsidies provided to TTSS participants who must frequently travel long distances to access services.

Under the new point to point transport regulations only rank and hail taxi services are subject to a maximum fare. The tariff for other services will be determined by service providers and a market mechanism based on supply and demand for services.

When a service is booked the passenger may be offered a fare estimate. PDCN has concerns regarding how pricing will be controlled for services in a deregulated market. People with disabilities who frequently use WAT services may have no other transport options, thus limiting their ability to exercise choice when accessing transport, and to actively participate in the market system that will largely regulate pricing for point to point services.

¹ Commonwealth of Australia, National Disability Strategy (NDS) 2010- 2020, page 52

² Ibid, page 35

PDCN believes an effective approach in a deregulated fare market would be introducing measures that make comparisons between point to point transport services easier for consumers. It will be essential to ensure there is transparency in the fare structures across point to point transport services to guarantee that in a provider neutral market the consumer is able to make informed choices.

PDCN encourages Transport for NSW to implement pricing guides and promote these guides to scheme users to ensure that knowledge of what constitutes a reasonable fare will continue to protect passengers from excessively high fares, particularly in the less competitive markets found in rural and regional NSW.

In a provider neutral system, particularly one employing a centralised booking service it is important that there is the ability to provide fare estimates to potential passengers. PDCN suggests if a provider neutral centralised booking service is established it should employ a weighted list so if many wheelchair accessible services are available at one time, the more expensive service is not automatically booked for the consumer.

PDCN recommends the passenger subsidies provided by the TTSS be able to be better tailored to meet the individual and varying needs of people with disabilities. PDCN suggests TTSS passenger subsidies be increased from 50% to 75% of the total cost of the trip for people with disability entitled to the M50 benefit whom are entirely dependent on wheelchair accessible vehicles for their transport, and are either frequent users of WATs, or otherwise use WAT's for the purposes of education or employment. Criteria for specific levels of subsidies could be introduced to the scheme to provide higher subsidies to individuals on lower incomes or an increase for people living outside of metropolitan areas who are likely to take longer taxi trips and have limited transport options.

Recommendation 8: Transport for NSW implement pricing guides for consumers to ensure passengers have clear price comparison information and can make informed decisions when using point to point transport services.

Recommendation 9: The TTSS have greater capacity to tailor subsidies to the individual needs of participants. PDCN suggests an increase in the passenger subsidy available through the TTSS in a variety of circumstances including a total reliance on wheelchair accessible vehicles for transport, significant geographical isolation and frequent use of WATs for the purposes of education or employment.

Wheelchair accessible Vehicles Booking

PDCN supports the introduction of a provider neutral system as we believe it would increase the availability of accessible transport services, provide healthy competition for the taxi industry and would ensure a better level of service for people with disabilities who use WAT services.

The introduction of a centralised booking service has been important in addressing the issue of individual taxi service providers being able to 'cherry pick' their fares, choosing not to accept a fare if it is of a short distance. Currently drivers of ridesharing services such as UberWAV and UberASSIST are unable to do this, as their fare is unknown to them until the passenger enters the vehicle. PDCN believes adopting a centralised booking service that is provider neutral and

based on this system, where the first available accessible vehicle in the area is allocated the job will facilitate shorter wait times and address the difficulty of securing a service for a short journey.

PDCN would like to see a provider neutral centralised booking service that books the nearest suitable vehicle regardless of the service provider. In order for a system to successfully integrate all available point to point transport providers pricing must be considered. PDCN suggests there be transparency in pricing structures to ensure consumers have choice and understand the service being offered.

PDCN suggests transport for NSW ensure that in a provider neutral market if one service is more expensive it should not be automatically allocated to an individual without consultation by call centre staff on fare estimation and the possible waiting time for a less expensive but comparable service. There may also be argument for services to agree to work at a set rate (or set fee range) in order to be booked through the centralised booking service. In this case subsidies and incentives being available to all point to point transport providers would be essential in preventing service providers from opting out of the booking system and choosing to only take private bookings.

PDCN also recommends the centralised booking service be expanded across NSW so individuals outside of the Sydney metropolitan area can benefit from improvements in wait times and a more convenient way of booking services. Furthermore, rural and regional areas would benefit from the introduction of new point to point services, including community transport vehicles that may have previously been largely underutilised in their communities.

PDCN feels there is benefit in extending the centralised booking service to other users with accessibility needs i.e. M40 users who are able to access non modified vehicles, especially in a provider neutral market. PDCN believes that although this would entail individuals having their status as an M40 TTSS participant identified during the booking process in order for their trip to be prioritised, prices for services are unlikely to be inflated. PDCN feel competition in the market, along with passenger knowledge of reasonable journey pricing would ensure that any pricing issues that could arise would be effectively managed.

Recommendation 10: The centralised booking service is expanded to be provider neutral and will book the nearest accessible and available vehicle for the passenger.

Recommendation 11: Transport for NSW ensure any provider neutral centralised booking system manages taxi bookings in a manner that protects customers from booking a more expensive service option without their knowledge.

Recommendation 12: The centralised booking service be expanded to users with other accessibility needs including M40 TTSS users.

Drivers

Under point to point transport reforms the responsibility for meeting safety standards rests with the industry and the obligation is placed on all drivers, operators and booking service providers to ensure that drivers are competent with the loading and unloading of a wheelchair. PDCN believes disability awareness training for drivers, along with training on correct loading and strapping procedures must be mandatory across the point to point transport network with set, measurable indicators to ensure a high standard of service is received by people with

disabilities regardless of the service used. PDCN believes that Transport for NSW has the responsibility to implement a uniform standard of training across all Transport service providers, including those providing point to point transport.

PDCN recommends that this mandatory standard of training be included in contracts with all transport service providers who will be eligible to receive incentives and subsidies. PDCN feels it is vital that all contracted public transport services are aware of their obligations to meet the standards in the Disability Discrimination Act 1992.

PDCN commends the commitment of the13Cabs training centre management to retraining drivers who have not completed a WAT job in a 6-month period. PDCN has observed a preference for our staff and members to book trips directly with their driver due to improper fitting of restraints being an area of high concern. This is predominantly raised as an issue in the Sydney metropolitan area due to the higher concentration of WAT services and WAT drivers and the larger number of trips that have not been pre booked. Incorrect loading and the improper fitting of restraints can lead to serious injuries and many individuals who utilise WAT services are non-verbal, and thus may be unable to instruct the driver on correct techniques.

Furthermore, individuals may feel they are in a vulnerable position and not be comfortable to articulate a problem to a driver with whom they are not previously acquainted. Commitments to frequent retraining of drivers are vital to maintaining a high level of customer service and to ensure loading and strapping of wheelchairs is completed correctly. PDCN recommends the holistic approach used to reviewing the performance of drivers should take into account any feedback or complaints received in addition to monitoring the rates of wheelchair job acceptance.

In addition, PDCN recommends the implementation of a rating system similar to those currently used by ride sharing services such as Uber, where journeys are rated using a star system with the option to provide comment on the service. The rating system could be administered through the centralised booking system following the completion of the trip and at the customer's preference via email, SMS or within the booking app. In this system, consistently low service ratings could result in retraining or in some circumstances the removal of the driver from working WAT jobs.

Furthermore, a separate external complaints system, not administered by service operators or the booking service provider should be available in a provider neutral system. This is important to ensure individuals are able to raise issues and provide feedback with greater anonymity and without fear of retribution from services operators.

Recommendation 13: Disability awareness training for drivers of wheelchair accessible vehicles, along with training on correct loading and strapping procedures must be mandatory across the point to point transport network with set, measurable performance indicators monitored by Transport for NSW.

Recommendation 14: A separate external complaints system be established to ensure individuals are able to provide feedback and raise issues with anonymity.

Payment

PDCN recommends transport for NSW move away from a paper based transport subsidy scheme with the introduction of a cross barrier smartcard based system that would allow for greater flexibility in payment method and allow for easier personalisation in the structure of transport subsidies.

PDCN envisions the adoption of a card that is similar to the OPAL. The card is registered to an individual and able to hold funds for payment of journeys. PDCN suggests any card must be reloadable online, over the phone or in person at selected retailers, providing an option for those without credit cards or bank accounts or under financial management to easily load money onto the card.

To ensure the accessibility of any smartcard that is adopted, it is important to maintain a number of payment options including the ability to still pay with cash but have the card scanned to receive the passenger subsidy. This would enable the TTSS user to complete both transactions, receiving the subsidy and payment, at once if this is their preference.

PDCN believes the adoption of a smartcard is preferable for our cohort as it will ensure technology can be used, i.e. the registration of the smartcard through an app or online to allow the individual to monitor its balance and use. However, a smartcard will also ensure the scheme can be accessed by individuals with low computer literacy or without access to technology or smartphones. The smartcard system could also increase the accessibility of the application process as it will negate the need for the cumbersome process of frequently ordering new paper docketts. This will also ensure that TTSS users will not experience a delay in receiving a new book of docketts. This has been reported to PDCN as a problem encountered by scheme participants who were then required to pay full price for their journeys in the interim period.

PDCN believes that the better integration of technology into the TTSS payment system would assist transport for NSW to collect data in a more efficient, up to date manner. We feel collecting information, such as the frequency and location of TTSS journeys will enable transport for NSW to better identify service gaps and effectively meet the ongoing needs of people with disabilities.

Furthermore, PDCN recommends the application of other new technologies such as digital meters with an audio option to guarantee consumer protections are in place as we move to a provider neutral point to point transport system. Digital meters with an audio option cater to passengers with a visual impairment by announcing the starting fare, the fare as it increases and the final fare at completion of the journey.

PDCN also believes the implementation of a smartcard system would be a desirable innovation for maintaining the security of the TTSS. The current paper docket system is vulnerable to misuse by drivers and service operators, with docketts able to be completed after the trip has taken place. A smartcard system would see a digital footprint recorded for journeys where the passenger subsidy is used. This would ensure that the fare charged can be tracked by the scheme participant and driver details are recorded, confirming the person with a disability is receiving the service from a driver with the correct training, and at the correct price.

Recommendation 15: Transport for NSW replace the current TTSS paper docketts with a smartcard based system.

Recommendation 16: Transport for NSW mandate all point to point transport vehicles are fitted with digital meters that provide an audio option to cater for passengers unable to read the meter.

Better integration with public transport

PDCN believes additional incentives would be a positive step in encouraging customers to use a combination of point to point transport and public transport. The importance of access and inclusion is a focus of all Government Disability Inclusion Action Plans and is highlighted in the National Disability Strategy (NDS). Policy direction four states ‘a public, private and community transport system that is accessible for the whole community’ is vital for people with disabilities to have mobility in the community and ‘underpins all aspects of life for people with a disability’³

PDCN thinks that Transport for NSW must prioritise bringing all NSW transport services in accordance with the Disability Standards for Accessible Public Transport 2002 and meet the goals of whole of journey accessibility, as outlined in the proposed Transport for NSW Disability Inclusion Action Plan 2017- 2020. PDCN would like to see better integration of point to point transport services with regular public transport however PDCN feels this will be difficult considering many transport services are currently not accessible. PDCN recommends Transport for NSW bring forward the timeline for infrastructure projects that are part of the transport access program wherever possible, to increase the accessibility of the transport system and enable people with disabilities to be less reliant on point to point services.

PDCN also believes an incentive such as an Opal transfer discount or additional allowance for fares that are transfers would encourage people to utilise public transport where available and accessible. Steps to encourage individuals to take shorter trips on point to point transport and to utilise public transport would reduce demands on point to point services and enable wheelchair accessible vehicles to be available for more journeys and to assist a greater number of people with disabilities.

In addition, PDCN believes that this further passenger subsidy is warranted due to the additional travel that may need to be taken by the person with disability to link with accessible public transport. The incentive would need to neutralise the costs incurred from the longer time spent travelling in the point to point transport service and compensate the passenger for their added travel time to make this option appealing.

Recommendation 17: Transport for NSW provide an Opal transfer discount or additional allowance for fares that include a transfer between point to point transport and accessible public transport.

³ Commonwealth of Australia, National Disability Strategy (NDS) 2010- 2020, page 32