



25 February 2010

The Hon John Ajaka MP
Chair
Select Committee on the NSW Taxi Industry
Parliament House
Macquarie Street
SYDNEY NSW 2000

Dear Mr Ajaka

Supplementary Submission to the NSW Legislative Council's Select Committee on the NSW Taxi Industry

The Public Interest Advocacy Centre (PIAC) refers to its earlier submission to the NSW Legislative Council's Select Committee on the NSW Taxi Industry (the Committee), *Taxis for all: submission to the NSW Legislative Council's Select Committee on the NSW Taxi Industry*¹ and the evidence given at the public hearing on 3 February 2010 by Ms Elizabeth Simpson on behalf of PIAC.

This supplementary submission responds to the questions that were raised with Ms Simpson during the hearing that were taken on notice.

a) Development of the Public Transport Standards

The dimensional requirements set out in the *Disability Standards for Accessible Public Transport 2002* (Cth) (the Public Transport Standards) are based on the research of Barry Siegger and reflect the requirements set out in the relevant Australian Design Standards developed by Standards Australia. While it was hoped that as part of the consultation on the Draft Disability Standards on Access to Premises this research would be updated, no further research on this issue has been carried out since 2002.

For further information about the development of the Public Transport Standards, and particularly how the 90th percentile was identified, PIAC refers the Committee to Standards Australia or the Disability Rights Unit within the Australian Human Rights Commission.

b) Improving the Key Performance Indicators

PIAC is of the view that there needs to be a greater focus on ensuring that the key performance indicators that measure the performance of taxis in NSW better reflects consumers' experience and feedback.

Specifically, PIAC submits that KPI 6 (average pick-up times) needs to be amended so

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that it includes a number of other categories or sub-KPIs, which provide a more detailed picture of the amount of time consumers actually wait before they are successfully picked up by a taxi after making the initial booking call.

Firstly, it should include a new category called 'average waiting times for consumers' that measures the entire time a consumer waits for a taxi, as opposed to the time the taxi records as a pick-up time. Returning to the scenario PIAC put forward in its earlier submission², if a person with disability called a wheelchair accessible taxi (WAT) but discovered that they could not fit into it, sent that WAT away and called another WAT and had to wait for the second WAT, the network should record the accumulated waiting time for the consumer as well as the pick-up times for each of these separate 'jobs'. This information could be recorded by the network as it should be possible for a network to ask customers if they are booking a new job and if not, identifying and updating their information regarding the earlier job.

Another set of additional categories that should be added to KPI 6 are 'average waiting times for pre-booked jobs' and 'average pick-up times for pre-booked jobs'. PIAC is of the view that including this additional information in reports about the NSW taxi industry would provide better and clearer information about the extent to which the industry is complying with the Public Transport Standards.

More generally, PIAC contends that it would be extremely beneficial if NSW Transport and Infrastructure consulted with other Australian states and territories as well as the Australian Human Rights Commission in order to maximise the accuracy and consistency of its KPIs and other reporting mechanisms with mechanisms across Australia.

However, without downplaying the significance of making improvements to the existing reporting indicators, the proposals set out above must be accompanied by changes to ensure that companies and operators are actually required to regularly provide this information to NSW Transport and Infrastructure and that follow-up action is taken when it is clear that a company or operator is falling well short of its obligations under the Public Transport Standards.

This could be done in a number of ways including amending the *Passenger Transport Act 1990* (NSW) or the terms and conditions of taxi licenses to make it a condition of all licenses that the owner/operator provide this information to NSW Transport and Infrastructure on a regular basis. Additionally, in its earlier submission PIAC advocated for the establishment in NSW of an independent complaints handling and audit body. PIAC submits that this body should also have the power to take follow-up action against a company or operator that fails to provide regular reports against KPIs or is performing significantly below its obligations in the Public Transport Standards.

c) Improving consumer input on the performance of WATs

A related issue is how the NSW Transport and Infrastructure could improve consumer input or feedback about WATs in NSW.

During the hearing, PIAC was asked to comment on existing customer feedback mechanisms including the Accessible Transport Consultative Group. PIAC has not had any direct dealings or experience with this group and is not able to comment on how effectively it functions. However, PIAC suggests that any consultative

group should meet on a regular basis (at least quarterly), be supported by a secretariat that produces minutes that are publicly available and has at least one meeting a year that is open to interested individuals to attend to raise issues that they believe should be brought to the Department's attention.

Another option is for NSW Transport and Infrastructure or an independent public transport complaints-handling body to conduct annual surveys and focus group sessions of WAT users. It should be possible to identify these customers based on the information already recorded by the networks when people are booking jobs for WATs.

Finally, in its earlier submission, PIAC made a number of other recommendations that would, if implemented, also improve consumer input on the performance of WATs including the creation of a NSW Public Transport Standards Access Panel, and resourcing of the disability sector.³

d) Mix of WAT and other taxis in the NSW fleet

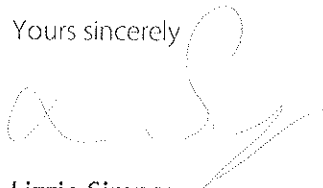
PIAC does not have a policy position on this issue.

e) Environmental impact of compliance with the Public Transport Standards

PIAC does not have the expertise to comment on this issue.

If you have any questions about the matters raised in this letter, please contact Ms Lizzie Simpson on the number below.

Yours sincerely



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¹ Lizzie Simpson and Robin Banks, *Taxis for all: submission to the NSW Legislative Council's Select Committee on the NSW Taxi Industry* (2010).

² Ibid 11.

³ Ibid 7-8.