

Community Transport Organisation Submission to TfNSW Draft Point to Point Transport Regulations 2017

Community Transport Organisation is pleased to comment on the draft regulations governing Point to Point Transport (Taxis and Hire Vehicles) in NSW.

CTO is the peak body for community transport in New South Wales, representing and advocating on behalf of the community transport sector. In its advisory and consultative role CTO aim to ensure sustainability of sector services to vulnerable communities.

Transport for NSW public consultation draft paper raises important issues for the transport landscape. In its response, CTO has focused primarily on matters that impact on the delivery of high quality transport services to people with mobility and disadvantage challenges that may preclude their engagement outside of the established community transport service delivery scope in New South Wales.

Point to Point transport provides both challenge an opportunity for community transport providers in New South Wales. A range of operational models may create perception of a disparate service sector; on the contrary, providers have historically been encouraged to develop operational and care principles to encompass local user requirements. The community transport sector has long experience of co design and consumer directed services.

Reform continues to impact the community transport sector from a range of sources, challenging sustainability through adjusted business drivers and legislative change. The sector welcomes opportunity for transformation to improve user experience and outcomes, and bring a level playing field to increase user choice. Recent major reforms have resulted in:

- Clarity of funding purpose to define source and deliverables
- Diminishing block funding to focus on user pay systems
- Contractual and legislative changes that impact business drivers

Concerns include:

- Process implications for community transport providers currently contracted by Transport for NSW. CTO propose that providers who already meet stringent operational standards and reporting requirements be automatically authorised to provide point to point transport services.
- Driver Authorities
 - CTO recommend linkages between driver authorities to streamline process for service providers.
- Pricing: \$1 levy per trip adds unnecessary overhead and is of questionable use through proposed redistribution to an industry development fund to unidentified beneficiaries
 - CTO supports the continuation of regulated maximum charges for rank and hail taxi services
 - Community transport providers require systemic change to provide written fare estimates
 - CTO does not support unregulated estimates, particularly problematic for older people and a range of vulnerable people, whose understanding may be compromised and further increase their disadvantage
 - CTO recommends that maximum per/hour and per/km fares be retained for booked services, relative to those set for rank and hail services, to ensure a safety net for vulnerable customers.
- Taxi Transport Subsidy Scheme vouchers
 - Recently increased value of vouchers now provides additional travel benefits and cost savings to users. However, increased modal choice has not been extended
 - CTO recommends that the TTSS scheme be immediately extended for use in community transport services, further enabling user choice.
- Viability and resource implications
 - The proposed requirement for all fleet vehicles to have business registration while under contract with TfNSW may create provider viability issues, impacting coordination and acquired efficiencies
 - It is questionable whether this requirement establishes a level playing field, or whether it further engenders biased competitive practices.
- Volunteer drivers provide a significant saving to government through extensive contribution to driving hours. Volunteer retention may be impacted by several factors, driving provider costs upwards. The factors include:
 - Potential to trade volunteer service time for income earning time, should volunteers perceive inducement to operate an independent point to point service
 - Additional costs associated with registration fees for volunteer drivers
 - Perceived lack of protection for drivers regarding ability to refuse transport if a passenger displays aggressive, offensive or otherwise threatening behaviour.
- Safety:
 - The safety and security of drivers and passengers may be compromised by lowering appropriate support requirements currently provided by booked service and taxi drivers. The proposed minimum standards of driver training focus only on the functional skills to assist passengers

with disability. Meeting passenger needs beyond loading and unloading require a standard of skill and understanding from drivers that facilitates safe and appropriate services

- Passengers challenged with mobility issues who do not necessitate wheelchair use, also require special support. These issues are not addressed in the proposed minimum standards
- Protection for drivers and share ride passengers is not addressed. CTO recommend inclusion of the ability to refuse transport if a passenger displays aggressive, offensive or otherwise threatening behaviour
- CTO recommends that as a minimum, the required level of competence for WAT drivers be expanded to include additional elements of TLIC2040 (training wheelchair accessible taxi services to passengers with disabilities), specifically elements 2 and 6 relating to effective communication and the application of ethical behaviour in delivering services to people with disability. The vast majority of people with disability who do not utilise WAT services, potentially require higher standards of safety in the provision of appropriate services than for people with mainstream mobility
- CTO recommends that the wider application of minimum standards of driver training be considered as part of ensuring that those providing point to point transport services have the skills and understanding they need to provide safe and appropriate services.

If you would like to discuss anything further in relation to the CTO submission, or require further input, please do not hesitate to contact Dianne Hallett on 1300 679 286 or [REDACTED]

Yours sincerely

Dianne Hallett
Interim Chief Executive Officer
Community Transport Organisation

