



Transport Disability Incentives and Subsidies Review

Discussion Paper

Table of Contents

Introduction.....	3
Terms of Reference	4
Changes in Point to Point Transport	6
Point to Point Transport.....	6
Vehicle and driver safety standards	6
Current Subsidies and Incentives.....	8
The Taxi Transport Subsidy Scheme	8
Wheelchair Accessible Travel	10
The Driver Incentive	10
The Wheelchair Accessible Taxi Interest-Free Loan Scheme	11
Free Wheelchair Accessible Taxi Licences.....	11
Subsidised centralised booking service	12
The Future of Subsidies and Incentives.....	13
Provider neutral subsidies and incentives	13
Passenger Subsidies.....	13
Types of point to point services	14
Pricing.....	14
Wheelchair Accessible Vehicles	15
Booking.....	16
Drivers.....	17
Payment.....	18
Better integration with public transport.....	19
Next Steps	21
Appendix	22
Taxi Transport Subsidy Scheme Eligibility Criteria.....	22

Introduction

In November 2015, the independent Point to Point Transport Taskforce provided the NSW Government its report with 57 recommendations on how to improve the state's point to point transport industry. In response to the report, the government legalised rideshare services and modernised regulation for point to point transport services to provide more opportunities for all service providers and their drivers, along with stronger safety mechanisms, better competition and choice for customers.

The Taskforce also recommended that the Government consider moving to a service provider neutral transport subsidy scheme for people with disabilities. In doing so, the Taskforce recommended that the Government should examine:

- “The viability of wheelchair accessible services given the higher capital and running costs associated with providing these services ...
- The effectiveness and adequacy of passenger subsidies and other incentives for the provision of services to all people with disabilities, with a view to directly subsidising some aspects of service provision, where necessary; and ...
- How best to ensure booking services for customers requiring wheelchair accessible services can be delivered, including in the context of moving to a provider-neutral model.”

Transport for NSW has engaged an independent agency to conduct an assessment of the financial viability of wheelchair accessible services. Transport for NSW will consider the broader effectiveness of subsidies and incentives in consultation with the wider community.

You can have your say by:

- Providing a written submission by email - TransportSocialPolicy@transport.nsw.gov.au by **30 November 2017**
- Mail: Transport Social Policy, Level 4, 18 Lee Street Chippendale NSW 2000
- Attending one of our community consultation workshops, please register your interest by emailing TransportSocialPolicy@transport.nsw.gov.au:

Location	Date & Time	Address	RSVP date
Newcastle	17 October 17, 12:30pm	6 Workshop Way Newcastle	13 October 17
Tamworth	20 October 17, 11:30am	Cnr Peel & Darling St's Tamworth	17 October 17
Sydney	23 October 17, 12:30pm	220 Pitt Street Sydney	18 October 17
Penrith	24 October 17, 12:30pm	123 Mulgoa Road Penrith	18 October 17
Dubbo	27 October 17, 12:00pm	1/80 Gipps Street Dubbo	24 October 17
CANCELLED	30 October 17, 1.30pm	6 Beach Road Batemans Bay	25 October

Batemans Bay			17
Coffs Harbour	2 November 17, 12:30pm	191 Harbour Drive Coffs Harbour	31 October 17
Kempsey	3 November 17, 10:30am	1 York Lane Kempsey	31 October 17

Terms of Reference

Purpose

The purpose of the review is to make recommendations on the future operation of the Taxi Transport Subsidy Scheme and the incentives provided to Wheelchair Accessible Taxi operators and drivers to provide services to customers with disability.

Scope of the Review

The review will:

- Evaluate the objectives of the Taxi Transport Subsidy Scheme in the context of changes to the policy and regulatory environment for point to point transport services.
- Consider the effectiveness of current incentives to encourage investment in wheelchair accessible vehicles and to prioritise use of the vehicles for customers with disability.
- Clarify the relationship between the Taxi Transport Subsidy Scheme and other transport options, including public transport, and the impact on scheme eligibility issues.
- Consider opportunities to amend administrative arrangements for the Taxi Transport Subsidy Scheme to improve the customer experience and the integrity of the program.

In considering these issues the existing subsidies and incentives will be assessed according to the following criteria:

1. In relation to subsidies for people with disability for point to point transport services, the review will examine:
 - the effectiveness and adequacy of current subsidies
 - how eligibility criteria is being applied and the impact on opportunities for people with disability to access point to point services, and
 - the feasibility of moving to a service provider-neutral transport subsidy scheme and the potential impact on service availability, cost and safety compliance.

2. In relation to wheelchair accessible vehicles, matters for consideration as part of the Review include:
- the commercial viability of operating wheelchair accessible vehicles, given the higher capital and running costs associated with providing these services
 - the extent to which the current wheelchair accessible vehicle fleet is being utilised by customers with disability
 - how industry incentives could be better linked to performance outputs and service delivery for customers with disability, including driver training requirements
 - options for the funding of future incentives, including directly subsidising some aspects of service provision if required, and
 - the function and public value of centralised booking services for wheelchair accessible vehicles, including alternative approaches to delivering reliable booking services for customers requiring wheelchair accessible vehicles.

Responsibilities

The review will be conducted by Transport for NSW.

Consultation will involve initial industry and ageing and disability stakeholder meetings, the development of a discussion paper, and broader community engagement

Changes in Point to Point Transport

Point to Point Transport

Point to point transport provides flexible, convenient options for customers to get from A to B via the route they choose at a time that suits – in exchange for a fare – in motor vehicles with 12 seats or less (including the driver). Modes of point to point transport include:

- Taxis
- Hire cars
- Rideshare services
- Community Transport providers, where the service is provided outside of a contract with Transport for NSW

It does not include transport that occurs on a regular route or to a timetable, such as a bus service.

Recently there have been significant changes in the point to point transport industry. Following the 2015 review by the Point to Point Transport Taskforce, the *Point to Point Transport (Taxis and Hire Vehicles) Act 2016* was passed by the NSW Parliament in June 2016. The Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017 was published on the NSW legislation website on 18 August 2017. The Act, Regulation and the powers of the new regulator for the industry, the Point to Point Transport Commissioner, will commence on 1 November 2017. The passenger service levy will commence on 1 February 2018.

The reforms are aimed at reducing red tape to allow the industry to provide a wider range of innovative new service offerings, make improvements to customer service and allow customers to benefit from increased competition on price.

Vehicle and driver safety standards

Under the new regulation, all wheelchair accessible point to point transport vehicles will be required to meet the same requirements for allocated space for wheelchairs, boarding devices and restraints. They will also be required to meet all national requirements in the Disability Standards for Accessible Public Transport that apply to wheelchair accessible taxis, including the requirement that response times for wheelchair accessible vehicles must be the same as for other vehicles.¹

There is an additional national requirement that requires taxi registration numbers to be placed in raised lettering near the passenger door handles.²

The Disability Standards for Accessible Public Transport are reviewed regularly by the Commonwealth government and other States and Territories.

¹ Schedule 1 Part 1.3 of the Disability Standards for Accessible Public Transport (DSAPT)

² Part 17.7 of the Disability Standards for Accessible Public Transport (DSAPT)

Under the point to point transport reforms, the responsibility for meeting safety standards rests with the industry. Taxi and booking service providers have a primary duty of care to ensure the safety of their services and are best placed to identify risks and put in place systems and strategies to mitigate those risks.

The new regulation also places an obligation on all drivers, operators and booking service providers for wheelchair accessible services to ensure that drivers are competent at loading and unloading a customer in a wheelchair.

Current Subsidies and Incentives

A range of subsidies and incentives operate in NSW to ensure that point to point transport is available to those who need it, particularly in relation to wheelchair accessible point to point transport.

Current incentives include:

- The Taxi Transport Subsidy Scheme, which subsidises 50% of all taxi fares up to a maximum subsidy of \$60 for eligible participants. This cap was increased from \$30 from 1 July 2016.
- Free wheelchair accessible taxi licences.
- The Wheelchair Accessible Taxi Interest Free Loan Scheme, which provides interest-free loans of up to \$100,000 to purchase and/or modify a vehicle for use as a wheelchair accessible taxi.
- The subsidised centralised booking service for wheelchair accessible taxis in metropolitan Sydney.
- The Wheelchair Accessible Taxi Driver Incentive Payment of \$15 (excluding GST) which is paid when drivers carry a passenger in a wheelchair. This payment was increased from \$7.70 (excluding GST) from 1 July 2016.

The Taxi Transport Subsidy Scheme

The current Taxi Transport Subsidy Scheme provides subsidised taxi transport for NSW residents who have certain severe and permanent disabilities. The complete eligibility criteria are at page 21. The subsidy covers 50% of the total fare with a maximum subsidy of \$60 per journey and is claimed using paper docketts. There are no overall spending caps under the current Taxi Transport Subsidy Scheme.

Participants are given a book of docketts, which looks a bit like a cheque book. Each docket has the participant's name on it along with a unique docket number. Once the passenger arrives at their destination, they fill out the docket with the following information about the journey:

- date
- time
- pick-up and drop off locations

The docket is then given to the driver as payment for half the fare. If the customer is unable to fill out the docket, the driver fills it out for them and writes PUTS (person unable to sign) in lieu of a signature. The customer retains the ticket stub, which has a unique docket number on it that matches the number on the docket. They then pay the remaining 50% of their fare directly to the driver. The driver must fill in their licence and driver authorisation numbers on the docket before submitting it to claim the subsidised portion of the fare from Transport for NSW.

Participants are assigned to two categories:

- M40 users, who do not require a wheelchair accessible vehicle; and
- M50 users, who are unable to transfer to a seat and must travel in a wheelchair accessible vehicle.

The NSW government provided over \$26 million to subsidise over 1.9 million trips in 2016. The scheme contains more than 44,000 registered participants. More than 32,000 of them are active participants – meaning they took at least one trip last year. Around 21,000 of our active participants are over the age of 65.

As the scheme is not means tested, information on incomes of our participants is not gathered. However in a 2013 survey of participants, 49% of M50 users and 70% of M40 users reported a household income of less than \$20,000 per annum. In many cases, this was someone living alone whose main or sole source of income was the Disability Support or Age Pension.

One popular feature of the scheme is that it is available for all types of journeys at the user's discretion. Participants surveyed in 2013 indicated that medical appointments are the most common purpose of journeys, followed by social visits and shopping.³

Many registered users of the scheme use it infrequently. However others rely on regular taxi transport to travel to and from work or education. Around 10% of customers utilise the scheme for over four journeys per week.

Tell us:

- **How is the current scheme being used and what is it being used for?**
- **How well does the current voucher system work?**

³ *Wheelchair Accessible Taxi Customer Research Report*, May 2013, Prepared for Transport for NSW by Stancombe Research and Planning

Wheelchair Accessible Travel

Customers that permanently use a wheelchair have particular requirements for point to point transport. They are often more reliant on point to point transport and use point to point transport more than non-wheelchair users. There are also additional costs involved in operating a wheelchair accessible vehicle. This makes wheelchair accessible point to point services a special case.

A separate study is being undertaken to assess the financial viability of the wheelchair accessible taxi industry and what role the incentives play in making these services viable. This will inform how future incentives should be structured and where other forms of service provision may be necessary. The review will also consider the purpose of each individual incentive and how well it is meeting its policy objectives.

Additionally, all wheelchair accessible vehicles providing point to point transport need to meet the same safety requirements. These requirements will be enforced by the NSW Point to Point Transport Commissioner.

The Driver Incentive

The Wheelchair Accessible Taxi Driver Incentive of \$15 (excluding GST) compensates the driver for the additional time it takes to load and unload a wheelchair into a vehicle. This payment was increased from \$7.70 (excluding GST) from 1 July 2016. It is currently paid for each trip where the following three criteria are met:

- The passenger is an M50 Taxi Transport Subsidy Scheme participant
- The vehicle is a licenced taxi that is wheelchair accessible
- The driver is an authorised wheelchair accessible taxi driver

The taxi industry also uses their own incentives to encourage drivers to take wheelchair jobs, including:

- compensating drivers for 'empty running time' to travel to a pick up point that is further away
- offering a longer job to drivers who agree to take a short job, or withholding access to high occupancy (maxi taxi) work where the driver has refused to take a booking

Tell us:

- **Does the driver incentive affect responsiveness to wheelchair jobs?**
- **Has the increase in the driver incentive payment affected wait times for wheelchair accessible taxis?**
- **Has the payment of the driver incentive for scheme participants affected responsiveness to wheelchair users who are not scheme participants?**

The Wheelchair Accessible Taxi Interest-Free Loan Scheme

Interest free loans are available for the initial cost of putting a wheelchair accessible taxi on the road. Prior to 2016, loans of \$30,000 from a total pool of \$800,000 were available outside of metropolitan Sydney to cover the cost of vehicle modifications.

From 2016 the scheme was expanded. Loans of up to \$100,000 are available, repayable over 10 years, to cover the full cost of purchasing and modifying a vehicle for use as a wheelchair accessible taxi. The overall funding pool has been increased to \$5 million. Loans are available throughout New South Wales, including in metropolitan Sydney, however funds are prioritised towards areas where there is unmet demand for wheelchair accessible services.

Two rounds of application have been completed under the new funding arrangements. 65 % of the applications received across those two rounds were from metropolitan Sydney. No applications were received from a town without an existing accessible taxi service.

Free Wheelchair Accessible Taxi Licences

Wheelchair Accessible Taxi licences are available free of cost throughout NSW. A Wheelchair Accessible Taxi must give preference to a wheelchair job over other jobs. Operators can also operate a wheelchair accessible vehicle on an unrestricted licence.

In November 2015, the Government accepted the Point to Point Taskforce's recommendation that there be no increase in the number of non-wheelchair accessible taxi licences in Sydney for a four year period, noting that replacement licences may be issued. In March 2017 Transport for NSW determined to release 62 replacement taxi licences in Sydney in 2017/18. In contrast, wheelchair accessible taxi licences are available to anyone that meets the criteria for a new or additional licence.

The total number of wheelchair accessible taxi licences in NSW varies from month to month but has remained at around 930 over the past year.

Tell us:

- **How do existing incentives affect the commercial viability of operating a wheelchair accessible service?**
- **Have incentives been effective at ensuring an adequate supply of wheelchair accessible vehicles?**
- **Is the additional cost of purchasing and modifying a wheelchair accessible vehicle a significant cost barrier to new entrants to the market?**
- **Would the funding be better spent on other incentive measures?**

Subsidised centralised booking service

In Sydney there is a centralised booking system for wheelchair-accessible taxis. Previously, this service was provided privately by a taxi network and funded by charging wheelchair accessible taxi operators for accessing the service. Since 1 July 2016, the government has subsidised this service as an interim measure subject to the outcomes of this review.

Customers have told us that, while they like to make private bookings directly with drivers, centralised booking provides an important option when known drivers are unavailable. Further, the centralised booking service is used by other organisations and government departments to make bookings on behalf of their clients.

Bookings can be made by phone, online or through an app. The person making the booking must provide:

- a phone number or phone numbers that will facilitate contact at both the pick-up and drop-off location
- information about the type of vehicle that the passenger requires
- the exact pick up and destination location

The job is then allocated to the closest vehicle, regardless of which taxi company they belong to.

Tell us:

- **How do you book wheelchair accessible taxis in Sydney?**
- **When and how often do customers use the centralised booking service?**
- **Which organisations are using the centralised booking service to make bookings on behalf of their clients?**
- **Are you satisfied with the service provided by the existing booking service provider?**

The Future of Subsidies and Incentives

Provider neutral subsidies and incentives

Entry into the point to point transport market of other service providers, including rideshare providers, has created competition in the industry, and the potential for reduced prices and improvements to customer service.

At the moment, passenger subsidies for people with disability are only able to be used on taxis and incentives for the provision of wheelchair accessible services are only available to the taxi industry. This review will consider whether these incentives and subsidies should be available for other point to point transport service providers, so that people with disability can exercise the same choice as other customers.

Affordability is often nominated by scheme participants as a key barrier to accessing point to point transport, and lower fares could benefit these customers. Additionally, competition could help to address some of the common customer service issues that customers with disability experience with point to point transport including:

- The driver's understanding and respect for the needs of people with disability
- Wait times
- Difficulty in getting service for shorter distance journeys (which people with disability often need)

However, some customers have a more limited ability to exercise choice, especially customers who are unable to drive or use public transport. In particular, the market for wheelchair accessible services is smaller than other point to point transport services, making it less likely to attract competition, particularly in rural and regional areas. Many subsidy scheme users either cannot use or do not have access to smartphones. Services that rely on use of smartphone apps, such as rideshare services, may not be accessible to many subsidy scheme participants. The review will consider what role subsidies and incentives will play in ensuring that wheelchair accessible services remain viable and to ensure that services to all people with disability continue to improve.

Passenger Subsidies

The current model of subsidising 50% of all fares up to a cap of \$60 provides choice and flexibility to users in determining how they use point to point transport, while also ensuring that public transport, where available and accessible, remains an attractive option. However, it does mean that some users still have high transport costs, particularly frequent users who rely on point to point transport to get to and from work or study. While increased competition could reduce transport costs for these participants, adjustments may need to be made where the demand for services is thin, particularly for wheelchair users or those in regional and remote areas.

Further, in a provider neutral subsidy scheme, consideration would need to be given to how the provision of a government subsidy would affect the service providers pricing decisions and how vulnerable customers would understand and choose between different pricing models.

Types of point to point services

Under the new Regulation, many different kinds of transport services will become point to point journeys, provided that:

- A fare is charged (even a nominal fare)
- The vehicle has 12 seats or less (including the driver)
- It is not a fixed route service that operates on a timetable

Some examples might include:

- A transport service provided by a not-for-profit, community group or disability service provider for which the passenger is being charged a fare. These services may be provided by volunteers.
- Journeys that are only available for a specific purpose or to a specific location nominated by the service provider, for example trips to and from the local shops
- Group travel, organised by the service provider for example a weekly shopping trip or an organised recreational outing

While community transport journeys, provided under a contract with Transport for New South Wales, are excluded, community transport providers can provide point to point transport services outside of their contract obligations. This could even be on the same journey – for example where a service provider is carrying a passenger who is ineligible for community transport on the same journey as a passenger who is eligible.

These services, where they fall within the new point to point regulations, will need to meet the same safety standards and authorisation requirements and pay the same levies and fees as other point to point transport services. Drivers of wheelchair accessible vehicles, including volunteer drivers, will need to be competent at loading and unloading passengers in a wheelchair and properly fitting restraints.

Providing passenger subsidies for these types of journeys could enable the provision of low cost transport options for people with disability. However it could also affect the viability of taxis and other commercial services that might offer a more flexible service, particularly in regional and rural areas with lower demand for services.

Pricing

The new Regulation makes a distinction between booked trips and rank and hail trips. Maximum fares will not be regulated for booked trips. However, booking service providers will be obliged to provide customers with an estimate of the fare before the booking is confirmed, including information about when the fare may be varied and any other fees or charges that may be charged. The fare estimate must be expressed as a flat rate, rate per time or rate per distance or a combination of those. Maximum fares will still apply to rank and hail trips.

Currently, taxis must use the meter when transporting a client of the Taxi Transport Subsidy Scheme. This requirement is retained under proposed point to point regulations, even though there will be greater flexibility in the pricing of other booked fares. This provides a degree of protection for users of the scheme.

However, in a service provider neutral scheme, not all service providers would use a meter or similar fare calculation device. A service provider may:

- Have a fixed fare for a journey
- Have a variable pricing structure where fares increase during periods of peak demand
- Offer different services or options which incur different costs

Subsidising fares in a deregulated fare market could have the unintended consequence of inflating costs, particularly where the service provider is aware that the passenger has access to a subsidy. This risk is increased in rural and remote areas where there are a smaller number of clients or for service providers who have an ongoing relationship with their clients. Consideration must also be given to how information about pricing should be provided to customers and whether customers with disability require additional assistance or protections in relation to understanding pricing information.

Tell us:

- **Is subsidising 50% of all fares up to a cap of \$60 an effective approach in a deregulated fare market, or are there alternative options for the delivery of passenger subsidies?**
- **Should passenger subsidies be available for use for any journey that is a point to point transport journey under the new Regulation?**
- **How can we ensure that passenger subsidies do not inflate the cost of point to point transport services?**
- **What assistance or protections to people with disability need in relation to pricing?**
- **What implications would service provider neutrality have on the viability of wheelchair accessible vehicles?**

Wheelchair Accessible Vehicles

Wheelchair accessible vehicles are more expensive to purchase, operate and service than other vehicles. Due to the high set up and operating costs involved in operating a wheelchair accessible service, incentives will likely remain necessary to attract and retain wheelchair accessible vehicles into the point to point transport industry.

A study into the financial viability of the wheelchair accessible taxi industry, being conducted as part of this review, will identify the costs involved in operating a wheelchair accessible service and determine what role incentives play in making these services viable. Identifying where the additional expenses are incurred can also assist in determining where subsidies and incentives can best be applied.

Making these subsidies and incentives provider neutral would encourage new entrants to the market to provide a wheelchair accessible service. However, it is important to note that other sources of government funding exist for wheelchair accessible vehicles that could be used as point to point transport vehicles.

- Vehicle modifications on private vehicles might be funded through the National Disability Insurance Scheme
- Point to point transport service providers may be funded under government contracts for service provision
- Grant funding may be available to certain service providers, particularly not-for-profit service providers to purchase or modify vehicles

These vehicles could now be used to provide point to point transport services, increasing the utilisation of these vehicles. However, care will need to be taken to ensure that service providers with access to multiple sources of funding do not have a competitive advantage over other service providers. Further, these vehicles may be used for other purposes, besides the provision of wheelchair accessible point to point transport services. If subsidies and incentives are applied to these services the return, in terms of the level of service available to wheelchair users, may not be as great.

Tell us:

- **How can incentives be used to increase the supply of wheelchair accessible vehicles, particularly in areas with unmet demand?**
- **How and when should subsidies be applied to ensure that wheelchair accessible services remain viable?**
- **Should all wheelchair accessible point to point vehicles be required to prioritise wheelchair jobs? How should this requirement be measured and enforced?**
- **How should subsidies and incentives be applied to encourage maximum utilisation of vehicles for wheelchair jobs?**
- **How should we manage the potential competitive advantage of service providers who receive other government funding?**

Booking

The government accepted the point to point Transport Taskforce's recommendation to "investigate how best to ensure booking services for customers requiring wheelchair accessible services can be delivered, including in the context of moving to a provider-neutral model."

Centralised booking of wheelchair jobs can help to allocate jobs efficiently, reducing empty running time for drivers and waiting times for customers. Many customers prefer to book directly with drivers who they have an established relationship with, especially for regular trips. This is beneficial for both customers and drivers. However it does mean that those jobs are not necessarily allocated amongst vehicles in the most efficient way.

New technologies which enable integration of booking and payment could be utilised by customers using a centralised booking service to deliver a more accessible and convenient service to wheelchair users. People with disability often need to provide additional information at the time of booking to ensure that their accessibility needs are met. A centralised booking service could store information about regular clients to provide a more efficient booking experience, particularly for customers with speech impairments or manual dexterity impairments that make communicating information difficult. It could collect customer feedback which could be used by government to improve accessible transport services. Complaints relating to safety could be referred to the Point to Point Transport Commissioner.

Further the centralised booking service could be used to provide valuable information about driver and vehicle performance, and demand and supply issues for wheelchair accessible services in Sydney. It could monitor the availability of wheelchair accessible services in Sydney and provide information to government about emerging availability issues. The booking service could also book trips on other point to point services, according to customer preferences. Further, there may be people who are not wheelchair users, but who have particular access requirements who may benefit from using a subsidised booking service.

Tell us:

- **How can the centralised booking service be used to drive improvements in wheelchair accessible services?**
- **Should the centralised booking service give customers the option of integrated booking and payment?**
- **Should the centralised booking service be 'provider-neutral'? Should it book the nearest suitable vehicle regardless of the service provider?**
- **Do non-wheelchair users with specific accessibility needs require access to a centralised or subsidised booking service?**

Drivers

Drivers play a key role in providing an accessible service for people with disability. For passengers travelling in wheelchairs, the driver must assist the passenger by loading and unloading the wheelchair from the vehicle. Drivers may also need to assist the passenger in paying for the trip, if the passenger has a manual dexterity impairment.

Additionally, many customers with disability who do not use a wheelchair require extra assistance when travelling. This may include:

- A person with a folding wheelchair who is able to transfer to a seat
- A person with vision impairment who needs assistance locating the taxi or orienting themselves at the drop-off point

These customers may also need additional time to get in and out of the vehicle and may also take shorter journeys.

Currently, a driver incentive is available for wheelchair journeys where the customer is also a Taxi Transport Subsidy Scheme participant. The subsidy is intended to compensate drivers for the additional time it takes to load and unload a passenger from the vehicle. Feedback from the taxi industry indicates that M50 Taxi Transport Subsidy Scheme jobs are viewed by drivers as desirable jobs, however, wheelchair jobs by non-scheme participants are viewed as being less desirable. There is also a perception from customers with disability who do not travel in wheelchairs that their jobs are less desirable for drivers as they require extra assistance that is not compensated through an additional incentive payment.

Over time competition could provide an incentive for service providers to improve their customer service and accessibility for people with disabilities. However, in other cases incentives will be required to ensure that people with disability have access to the services they need.

Tell us:

- **What aspects of driver behaviour need to be compensated or incentivised and which aspects are customer service matters for service providers?**
- **How can we ensure that paying incentives for some jobs does not create a disincentive for other jobs, such as:**
 - **wheelchair users who are not scheme participants**
 - **people taking short journeys?**
 - **people with disability who are not wheelchair users but require extra assistance?**
- **Is there a more effective way to incentivise responsiveness to wheelchair jobs?**

Payment

The current Taxi Transport Subsidy Scheme relies on a manual process for payment (for customers) and reimbursement (for service providers) of the subsidy. This process is impossible for many clients of the scheme to use independently and is cumbersome and inefficient for service providers.

Moving to a paperless system for the subsidy scheme will make it easier to use for people with disabilities. A number of jurisdictions interstate use smartcard technology, where the taxi meter and card reader are integrated so that the exact fare from the meter is recorded and the subsidy is automatically deducted from the price of the fare. These cards can be automatically cancelled when lost or stolen and the risk of fraud is reduced.

Point to point transport service providers have also adopted other technologies with integrated booking and payment through smartphone apps. These technologies can offer significant benefits to customers with disability:

- Automatic payment can enable people with mobility impairments to independently manage payments

- People with vision impairment, who cannot see what fare is showing on the taxi meter, can receive fare information and receipts in a format that is accessible (provided the app is compatible with screen readers)

A future subsidy scheme must allow and encourage service providers to implement technologies that improve the accessibility of point to point transport services, now and in the future. However, many scheme users either cannot use or do not have access to smartphones. It may be necessary to allow multiple methods for payment of passenger subsidies.

Tell us:

- **How can we move away from a paper based transport subsidy scheme, while still ensuring that everyone has the ability to access the scheme?**
- **How can we design a scheme that supports ongoing technological innovation without disadvantaging users without access to digital technology?**

Better integration with public transport

Point to point transport provides an important, flexible travel option for people with disability. For some people with disability, point to point transport is essential for participation in work, education or recreational activities. Many others need point to point transport to get to and from accessible public transport stations, stops and interchanges. People with disability may also use other modes of transport for their day to day needs, and only use point to point transport in exceptional circumstances: for example late at night, when the weather is bad, or when there is no accessible public transport route.

The NSW public transport network is becoming more accessible, and many people with disability use the Taxi Transport Subsidy Scheme to travel to and from accessible public transport stations, stops and interchanges. For others, particularly those in rural and remote areas, public transport might not be available or accessible. Sometimes, for people with disability, while it may be possible to take a journey on public transport, circumstances can arise that make it unsafe or impractical, for example:

- Rain can make it unsafe to use an electric wheelchair outdoors
- People with high support needs must work around the availability of attendants and carers
- Service disruptions can make an accessible journey inaccessible
- Roadworks, construction and inclement weather can make it difficult for a person with vision impairment to orient themselves

Incentives could be used to encourage customers to use public transport, without limiting their access to point to point transport subsidies. For example, additional incentives could be applied where passengers are using a combination of taxis and public transport to complete their journeys.

Tell us:

- **Should additional incentives be offered for journeys that include a combination of point to point and public transport?**

Next Steps

You can ask questions about or provide comments on any of the issues raised in this discussion paper by contacting Transport for NSW

Email: TransportSocialPolicy@transport.nsw.gov.au

Mail: Transport Social Policy, Level 4, 18 Lee Street Chippendale NSW 2008

You can also register your interest to attend one of our facilitated workshops in the following locations:

- Newcastle
- Tamworth
- Sydney
- Penrith
- Dubbo
- Bateman's Bay
- Coffs Harbour
- Kempsey

The public consultation process will conclude on 30 November 2017. All feedback received by this date will be considered as part of the review. Transport for NSW will report to the Minister for Transport on the outcomes and recommendations of the review.

Appendix

Taxi Transport Subsidy Scheme Eligibility Criteria

To be eligible for the Scheme an applicant must:

- a) be a permanent resident of Australia
- b) normally reside in NSW
- c) not be a member of a similar Scheme in another Australian State or Territory
- d) be over school age (preschool aged children, regardless of disability, are ineligible for inclusion in the Scheme)
- e) have a severe and permanent disability in one of the following categories:

NOTE: Persons receiving treatment or undergoing rehabilitation which is expected to improve their condition are not considered to have a permanent disability and are not eligible for the Scheme.

Ambulatory / Mobility

Unable to walk or stand. Mobile only in a wheelchair due to a physical disability; or

Mobile outside of home only with a wheelchair due to a physical disability; or

Severe and permanent ambulatory problem that cannot functionally be improved which limits walking to a distance of 20 metres or less without rest and also:

- a) necessitates permanent use of a walking aid for all mobility; or
- b) necessitates the constant assistance of another person for all mobility; or
- c) unable to independently ascend or descend three or more consecutive steps of 350mm height.

Vision

- a) Total loss of vision in both eyes or severe permanent impairment of 6/60 or less in each eye; or
- b) Field of vision reduced to 10o or less all round; or
- c) Total loss of lower half field of vision which cannot functionally be improved by corrective lenses or other treatment; or
- d) Homonymous hemianopia with significant mobility limitations.

Epilepsy

Severe and uncontrollable epilepsy.

Intellectual

Severe permanent intellectual disabilities which render the person incapable of travelling on public transport without the constant assistance of another person.

Severe cognitive or memory impairment such that the applicant:

- a) is unable to be aware of or communicate destination; or
- b) is unable to manage the payment of fares; or

- c) exhibits socially unacceptable behaviour.

3.5 Speech and/or Hearing, or Functional

Severe and permanent communication difficulties necessitating the constant assistance of another person to use public transport.

Total and permanent functional loss of both upper limbs which renders the person incapable of travelling on public transport without the constant assistance of another person.

Transport for NSW reserves the right to decline your application if you have previously been suspended or removed from the NSW Scheme or a similar scheme in another State or Territory