



Victorian Equal Opportunity
& Human Rights Commission

Submission to *Setting the Scene* – Taxi Industry Inquiry Issues Paper

24 June 2011

About the Commission

The Victorian Equal Opportunity and Human Rights Commission is an independent statutory body with responsibilities under three laws:

- *Equal Opportunity Act 1995*¹
- *Racial and Religious Tolerance Act 2001*
- *Charter of Human Rights and Responsibilities Act 2006*

The Equal Opportunity Act makes it against the law to discriminate against people on the basis of a number of different personal characteristics.

The Racial and Religious Tolerance Act makes it against the law to vilify people because of their race or religion.

Under the Equal Opportunity Act and the Racial and Religious Tolerance Act, the Commission helps people resolve complaints of discrimination, sexual harassment and racial or religious vilification through a free and impartial complaint resolution service with the aim of reaching a mutual agreement.

The Charter of Human Rights and Responsibilities means that government and public bodies must comply with human rights and must consider relevant human rights when making decisions. The Commission's role is to educate people about the rights and responsibilities contained in the Charter and to report annually to the Victorian Government about the operation of the Charter. The Commission does not handle complaints related to the Charter.

Services provided by the Commission include:

- a free telephone Enquiry Line
- a free and impartial dispute resolution service
- information and education about equal opportunity, racial and religious vilification and the Charter of Human Rights and Responsibilities
- education, training and consultancy services.

¹ The *Equal Opportunity Act 1995* will be replaced by the *Equal Opportunity Act 2010* in August 2011.

Introduction

The Victorian Equal Opportunity and Human Rights Commission (the Commission) welcomes the opportunity to make a submission to the Taxi Industry Inquiry discussion paper 'Setting the Scene'.

The laws under which the Commission has responsibilities are relevant to the taxi industry in a number of ways. The *Equal Opportunity Act 1995*, which will be replaced by the *Equal Opportunity Act 2010* in August 2011, makes it unlawful to discriminate in the provision of goods and services, including transport.

The new Equal Opportunity Act imposes a positive duty on organisations covered by the Act to take reasonable and proportionate measures to eliminate discrimination. This places an additional obligation on taxi service providers and regulators, including the Victorian Taxi Directorate (VTD) and the proposed Taxi Services Commission, to implement proactive measures to prevent discrimination in the provision of taxi services on the basis of attributes covered by the Act.

Further, the *Charter of Human Rights and Responsibilities Act (2006)* requires government departments and public bodies to act in ways which are compatible with human rights and to properly consider relevant human rights when developing policy and delivering services.

The Commission notes that the VTD is a public authority, as will be the proposed Taxi Services Commission. As such, these agencies are bound to consider the rights protected by the Charter in their operations. A key right under the Charter relevant to the provision of taxi services is the right to equality – that is, the right of every person to enjoy their human rights without discrimination.

The taxi industry is also obliged to comply with the provisions of the Federal *Disability Discrimination Act 1992* which, in relation to transport, are articulated through the Disability Standards for Accessible Public Transport (DSAPT).

The Commission's primary interest in this inquiry is in its potential to improve the accessibility of taxi services to people with a disability. A significant proportion of the Victorian population has a disability and we know that many more will acquire a disability with age. The ageing of the population is also a factor in the need to improve the equitable provision of taxi services to all Victorians.

In response to stakeholder feedback and complaints from people with a disability, the Commission conducted research in 2006 on the accessibility of the taxi industry for people with a disability. The research was supported by the VTD.

The resulting report, *Time to respond: Realising equality for people with a disability utilising taxi services*, identified aspects of the provision of taxi services that may discriminate against people with a disability and made recommendations that sought to improve service provision to people with a disability using taxi services.

Since 2007, the Commission has worked closely with the VTD to progress the *Time to respond* recommendations. A key initiative resulting from the recommendations was the VTD's establishment of the Disabled Persons Taxi Advisory Committee (DPTAC), a forum to facilitate input from people with a disability regarding the performance of taxi services. The Commission strongly endorsed the establishment of DPTAC and feedback from the Commission's Disability Reference Group (DRG) has indicated that it has significantly improved communication between the VTD and the disability community.²

² Victorian Equal Opportunity and Human Rights Commission, *Time to respond – three years on: realising equality for people with a disability using taxi services* (2010), 12

In 2010 the Commission produced a follow on report charting progress against the recommendations of the 2007 *Time to Respond* report. The findings of the *Time to Respond – three years on* report were informed by a survey commissioned by the Commission and the VTD to test consumers' experiences of the taxi industry across a range of areas based on the recommendations of the initial report. Consultations were also conducted with the DRG and the taxi industry.

Both the 2007 and 2010 *Time to Respond* reports are attached to this submission.

This submission is based largely on the findings of the 2010 research that informed the *Time to Respond – three years on* report. Based on the Commission's interest in equity of access to taxi services by people with a disability, the submission focuses on responding to the questions in the issues paper to which the findings of the Commission's research on this issue are particularly relevant. These relate primarily to the following principles in the Terms of Reference:

- customer and service focus
- safety and passengers of drivers
- support for and training of drivers
- an outcomes-based and accountable regulatory framework.

Responses to questions in the Issues Paper

What role do taxis and hire cars play within Victoria's overall transport network alongside private vehicles, trains, trams, buses and other forms of transport?

Taxis play a vital role in enabling many people with a disability to participate in the everyday activities that the rest of the community takes for granted, such as going to work and school, attending medical appointments and participating in social activities.

Approximately 18 per cent or one million Victorians have some form of disability.³ This number is expected to increase as the population ages. Private cars are not a viable transport option for many people with a disability and public transport remains inaccessible in many areas. While the objective of the Disability Standards for Accessible Public Transport (DSAPT) under the Disability Discrimination Act, introduced in 2002, is to remove discrimination against people with a disability in the public transport system, the timeframe for implementation of the Standards is 30 years.⁴ These factors mean that taxis will continue to be a crucial mode of transport for people with a disability for many years to come.

In its *Time to Respond – three years on* report, the Commission reported that people with a disability registered with the Multi-Purpose Taxi Program (MPTP) made over four million trips per year. Nearly 10 per cent of these were made in wheelchair accessible taxis.⁵ However, many people with a disability do not require wheelchair accessible taxis and many of the respondents to the Commission's survey reported problems with accessing conventional taxi services. While there has been rapid growth in wheelchair accessible taxi use in recent years by people with physical disabilities,⁶ it is important to remember that many people with a disability who rely on taxi services are vision- or hearing-impaired or have an intellectual, neurological, cognitive or psychosocial disability.

The taxi industry provides a critical service for people with a disability to enable them to participate equitably in all forms of public life. The system needs to provide an equitable service for, and be responsive to, the diversity of people with a disability in Victoria.

What needs and expectations does the community have in relation to taxi and hire car services?

The Commission's research shows that people with a disability expect taxi services which are timely, safe, consistent and affordable – the same quality of service expected by the general community. The Commission acknowledges that improvements have been made to some aspects of taxi service delivery to people with a disability in recent years. However our research indicates that in some crucial areas, the standard of taxi service to people with a disability falls far short of the service available to others in the community, or of what should be expected of what is essentially a form of public transport.

³ Australian Bureau of Statistics, cat. No. 4430.0 *Disability, Ageing and Carers Australia: Summary of Findings* (2009), 6

⁴ The Allen Consulting Group, *Review of the Disability Standards for Accessible Public Transport Final Report* (2009), 8

⁵ Victorian Equal Opportunity and Human Rights Commission, above n 2, 20

⁶ *Ibid* 26

The findings of the 2010 survey commissioned by the Commission and VTD show a significant increase since the 2006 survey in the proportion of passengers reporting difficulties associated with areas of service provision including:

- booking a taxi through the automated system
- wait times for taxis
- safety during the journey.

These issues will be discussed further in the submission.

Our research demonstrates that people with a disability do not have equitable access to safe, reliable and affordable taxi services in Victoria.

How safe is the practice of hailing taxis for passengers, drivers and the broader community?

While a small number of respondents to the 2010 Commission/VTD survey reported concerns with safety in hailing taxis, more commonly reported were difficulties in hailing taxis due to the unwillingness of drivers to accept the fare. Typical reasons provided by survey respondents for drivers' refusal to accept their fare included the belief that a person in a wheelchair requires a wheelchair accessible taxi, although some wheelchairs are foldable and will fit in the boot of a conventional taxi, and the unwillingness of some drivers to transport passengers with assistance dogs. Some respondents with assistance dogs reported that drivers refused to accept their fare on religious grounds.⁷

Under the Equal Opportunity Act, it is discriminatory to refuse a service to a person with a disability using an assistance dog.⁸ In the *Time to Respond – three years on* report, the Commission reported that the VTD has improved its compliance strategy to meet the industry's legal obligations in relation to the carriage of assistance dogs. Enforcement measures introduced by the VTD allow for financial penalties to be imposed on taxi drivers who refuse to carry assistance dogs or who provide a lesser standard of service to people with a disability.⁹

These measures are encouraging and would be strengthened by communication, education and training strategies to improve compliance throughout the industry. Such strategies would be consistent with the positive duty applying to the VTD and proposed Taxi Services Commission under the Equal Opportunity Act 2010 and these authorities' obligations under the Charter of Human Rights and Responsibilities.

Lastly, a number of survey respondents reported that their disability made it difficult for them to hail taxis. This reinforces the need for appropriate alternative booking systems for people with a disability, which will be discussed further in this submission.

The Commission's research identifies challenges for people with a disability hailing a taxi due to the unwillingness of drivers to accept a fare from a person with a visible disability or with an assistance animal.

⁷ Market Solutions, *Quality of Taxi Services for Passengers with Disabilities – A Report of Research Findings* (2010), 26

⁸ The *Equal Opportunity Act 2010*, which takes effect in August 2011, clarifies that discrimination because of disability or impairment includes discrimination on the basis of an assistance aid that alleviates the effects of a person's impairment, including an assistance dog – see s 7(4)(c), *Equal Opportunity Act 2010* (Vic)

⁹ Victorian Equal Opportunity and Human Rights Commission, above n 2, 22

Are wait times for booking taxis in line with community expectations?

Lengthy response times for wheelchair accessible taxis have historically been problematic throughout Australia. The Disability Standards for Accessible Public Transport (DSAPT) under the *Disability Discrimination Act 1992*, enacted in 2002, set a benchmark for response times for wheelchair accessible taxis to be the same as conventional taxis by December 2007. The recently released review of the Standards found that this benchmark has not been met.¹⁰

In its review of taxi fares in 2008, the Essential Services Commission also raised the need to improve taxi wait times for wheelchair accessible taxis.¹¹ In response, the State Government introduced a number of reforms including increasing the lifting fee paid to drivers for loading and unloading passengers into wheelchair accessible taxis and introducing 330 new wheelchair accessible taxi licences.

The VTD has also implemented a performance based booking system to make network service providers (NSPs) accountable for the performance of their fleet in responding to wheelchair accessible taxi bookings. Project WAIT, introduced in 2010, aims to ensure that wheelchair accessible taxi drivers prioritise responding to bookings from wheelchair users and that NSPs allocate jobs accordingly.¹²

Despite these initiatives, 60 per cent of respondents to the 2010 Commission/VTD survey reported difficulties with the length of time waiting for a taxi, with over 10 per cent reporting having to wait up to one or more hours for a taxi. Delays were more commonly experienced by passengers in metropolitan Melbourne than in non-metropolitan areas.¹³

It should be noted that these figures relate to people with a disability using both conventional and wheelchair accessible taxis.

Our research indicates that lengthy or unpredictable wait times are the norm rather than the exception for many people with a disability. This level of service delivery would not be acceptable to the rest of the community as standard practice and makes it impossible for a person with a disability reliant on taxis to reliably arrive at a meeting or appointment on time. As one survey respondent commented,

‘I have missed many hospital appointments because a cab booked a few days in advance will be one to two hours late.’¹⁴

The Commission acknowledges that a number of factors contribute to lengthy wait times for wheelchair accessible taxis and that it will take some time for significant change to result from initiatives such as Project WAIT. In the *Time to Respond – three years on report* the Commission recommended ongoing monitoring and evaluation of such initiatives to measure their success.

It was also noted that some 135,000 Multi-Purpose Taxi Program members who do not use a wheelchair are reliant on the conventional booking system and therefore will not be assisted by initiatives such as Project WAIT.

The Commission’s research indicates that people with a disability have unacceptable wait times for both conventional and wheelchair accessible taxis and recent reforms will not necessarily address this challenge with efficiency in the short term.

¹⁰ The Allen Consulting Group, above n 4, 55

¹¹ Essential Services Commission, *Taxi Fare Review 2007-08: Final Report* (2008)

¹² Victorian Equal Opportunity and Human Rights Commission, above n 2, 17

¹³ Market Solutions, above n 7, 23

¹⁴ Ibid 18

How effective are current telephone and internet booking services, and does that effectiveness vary depending on the time of day or night?

Nearly 40 per cent of respondents to the 2010 Commission/VTD survey reported difficulties in booking a taxi using the automated telephone booking service. Respondents who were not MPTP members were significantly more likely than MPTP member respondents to report difficulties with the automated system.¹⁵

A number of respondents identified difficulties in using the telephone booking service due to their disability. While an internet booking service is also available, people with a disability do not always have access to a computer when they need to book a taxi. Some survey respondents indicated that they book by SMS and suggested that service could be improved by providing responses to bookings made via SMS.

The booking system for taxi services does not meet the needs of all people with a disability and different booking systems are required to provide a full range of accessible options for people with a disability.

Are the needs of regional and rural users, and other current or potential users that live in areas that have limited access to other forms of public transport, being adequately serviced by the current structure and regulatory regime?

The Commission is not in a position to comment on the structural adequacy of the taxi service system for rural and regional areas. However, the findings of the 2010 Commission/VTD research indicated variations in service provision between metropolitan and non-metropolitan areas, with more positive reports about service provision in rural and regional areas on the whole. As previously noted, people with a disability in rural and regional areas were less likely to report difficulties with wait times. They were also more likely to report that drivers were patient, polite and treated them with respect.¹⁶

The Commission's research indicates positive reports about taxi service provision in rural areas, but this does not address the lack of a full range of public transport options in those areas.

How can a customer service culture be strengthened in the taxi and hire car industry?

Effective complaints management is a crucial element of service delivery. As well as responding to individual issues, complaints handling processes can contribute to the continuous improvement of services and strengthen an industry's customer service culture.

In its *Time to Respond – three years on report*, the Commission noted that significant measures have been adopted by the VTD in recent years to improve its complaints handling processes. These have included improving the accessibility of its complaints process to people with a disability; implementing an internal investigation process to review complaints and identify systemic issues, and improving the way the VTD communicates performance and complaints trends to the industry.

However consultation with the Commission's Disability Reference Group (DRG) towards the report indicated that the complaints process is not promoted adequately to people with a disability and that many people do not know where or how to make a complaint. A

¹⁵ Victorian Equal Opportunity and Human Rights Commission, above n 2, 27

¹⁶ Ibid 14

number of respondents to the Commission/VTD survey also reported that they were afraid to complain as they felt vulnerable to retribution from drivers.

The Commission recommended the development and implementation of a communication strategy about the complaints process with input from disability advocacy groups, and the use of the Department of Transport's customer satisfaction monitor to collect evidence of service delivery issues.

The Commission also recommended that complaints handling form part of the remit of a central agency independent of the VTD such as the Public Transport Ombudsman.¹⁷ Management of complaints, or a higher-level mechanism for review of complaints decisions and monitoring of trends, may be a role for a future Taxi Services Commission. Whatever the future arrangements for the taxi industry, however, it is important that there is an independent mechanism to deal with complaints from users of that industry.

The Commission strongly recommends that there should be an independent avenue for consumers of taxi services to lodge complaints and that the industry complaint handling services, which should be the first point of complaint, should be more accessible, transparent and available to provide client feedback on utilisation of taxi services.

What influences drivers' and passengers' perceptions of safety?

How can safety for passengers, drivers and the broader community be maximised?

In its *Time to Respond – three years on report* the Commission noted feedback from its Disability Reference Group that safety and standards of service have improved since the introduction of the Taxi Industry Accreditation Scheme in 2007 and accompanying business and safety standards.¹⁸

However, nearly half of the respondents to the 2010 Commission/VTD survey reported feeling unsafe when using taxis. Reasons given by respondents for feeling unsafe included dangerous driving, rude or abusive driver behaviour, and feeling vulnerable with drivers who may take advantage of them due to their disability, as expressed by the following quote:

*Some drivers are intimidating and take advantage of a disabled woman. I was once taken from the Royal Melbourne Hospital to Werribee via the Tullamarine Freeway, Pascoe Vale Road and the ring road. Every time I attempted to query the route the driver became more aggressive and I got home very frightened and intimidated.*¹⁹

The Commission's Disability Reference Group noted that service delivery was better where the service was delivered by an owner-driver or where personal relationships had been established with regular drivers.²⁰ However, personalised service is not always possible, and it should not be necessary for a person with a disability to know the driver in order to feel safe.

Further, a number of respondents to the 2010 Commission/VTD survey noted that inadequate wheelchair restraints, or lack of driver knowledge about using them, caused them to feel unsafe. As one respondent said,

¹⁷ Ibid 24 - 25

¹⁸ Ibid 14 - 15

¹⁹ Market Solutions, above n 7, 32

²⁰ Victorian Equal Opportunity and Human Rights Commission, above n 2, 22

Often drivers do not want to use chair restraints or provide a seat belt, have no idea how to use them, or they are broken. They often act amazed or angry that I insist on being safe and secure.²¹

In the Commission's *Time to Respond – three years on* report, the Victorian Taxi Association identified that many drivers experience problems with the variety of wheelchairs and scooters used by people with a disability and the lack of appropriate tie-down points in many taxis. The Commission noted in the report that it is the responsibility of the taxi industry to ensure that the installation and use of wheelchair and scooter tie-down fittings complies with the Australian and New Zealand Standards for Transport.²²

Driver training is integral to the provision of safe and good quality service to people with a disability and by implication, this means that drivers should be supported to provide quality services to these people within the Victorian community.

Are the needs of mobility disadvantaged users being adequately serviced by the current structure and regulatory regime, including through the Government's Multi Purpose Taxi Program?

As other parts of this submission have addressed other aspects of service delivery for people with mobility impairments, the Commission's response to this question will focus on the Multi-Purpose Taxi Program (MPTP).

The Commission's *Time to Respond – three years on* report noted that the MPTP trip cap and annual limits were doubled in response to the Essential Services Commission's 2008 review of taxi fares. This was a positive measure which has helped to improve access to taxi services for MPTP members. However, elements of the criteria for access to the MPTP remain problematic. For example, one of the eligibility criteria is an ability to show financial hardship. This disadvantages many people with a disability who are employed but lack alternative transport options due to the frequency or inaccessibility of public transport in their area.

In the Commission's view, means-testing the MPTP for applicants who lack alternative viable transport options does not provide equitable access to people with a disability.²³ The Commission recommended in the report that financial accessibility of taxi services for people with a disability, including the structure of the MPTP, be addressed in future reform of taxi services.

The Commission has reported concerns about the eligibility criteria for the MPTP imposing economic disadvantage on some groups of people with a disability who utilise taxi services.

Is the content, duration and delivery of current training courses sufficient to encourage an optimal service culture, driver retention and long term professional driver engagement?

Comprehensive training for drivers is critical to ensure appropriate service provision for people with a disability. In its *Time to Respond – three years on* report, the Commission noted that the VTD had identified inadequacies in its current driver training course in relation to responding to passengers with a disability. The VTD reported that contractual

²¹ Ibid 44

²² Ibid 21

²³ Ibid 18

arrangements with the current training providers prevent changes to the course until 2012.²⁴

The Commission recommended in the report that the VTD improve its driver training course content in relation to passengers with a disability as soon as practicable given its contractual obligations.

At minimum, driver training should cover:

- Disability awareness, particularly in relation to communication. Respondents to the 2010 Commission/VTD survey variously noted that taxi drivers had difficulties in communicating with passengers with vision and hearing impairments and those with speech impairments;
- Legal obligations under the Equal Opportunity Act and Disability Discrimination Act, including the obligation to transport assistance dogs;
- For drivers of wheelchair-accessible taxis, compliance with the Australian and New Zealand Standards for Transport in relation to use of tie-down points, and safe handling of wheelchairs and scooters.

In order to ensure that training is appropriate and adequately responds to the needs and expectations of people with a disability, input into its development should be sought from people with disability and disability advocacy groups through the Disabled Persons Taxi Advisory Committee (DPTAC).

At the time of writing the *Time to Respond – three years on* report, only drivers of wheelchair accessible taxis received disability awareness training. Given that some 135,000 MPTP members do not use a wheelchair,²⁵ and that many people with a disability are not MPTP members, the Commission recommended that driver training regarding passengers with a disability be compulsory for all drivers, and that a consistent level of training be provided to taxi drivers across Victoria.

Further, the Commission recommended that experienced drivers receive refresher training, which could take place as part of the licence renewal process.

The Commission has made a range of recommendations about improving driver education to ensure better provision for people with a disability and also emphasised the importance of refresher training for drivers.

What could be done to improve regulation and the role of the regulator?

The complex structure of the taxi industry appears to contribute to difficulties in enforcing regulation, with the VTD, network service providers, licence holders and operators each bearing a level of responsibility for compliance. In terms of providing an equitable service to people with a disability, the industry as a whole is obliged to comply with the Equal Opportunity Act and the Disability Discrimination Act. As a public authority, the VTD is also bound by the Charter of Human Rights and Responsibilities. However, the structure of the industry makes it difficult to address the multiple elements of service delivery which contribute to systemic discrimination, such as in the case of lengthy wait times for wheelchair-accessible taxis.

Further, the Commission acknowledges the challenges of regulating an industry with high numbers of short term and part time drivers.

The Commission notes that the Inquiry is considering whether the Victorian taxi industry is subject to an excessive degree of regulation and aspects of service delivery for which

²⁴ Ibid 19

²⁵ Ibid 19

regulation is appropriate. The Review of the Disability Standards for Accessible Public Transport determined that there is a rationale for government intervention in order to remove discrimination against people with a disability in the provision of transport services, given that it is unlikely that the private sector would provide accessible transport in the absence of regulation. The Review Report noted that the Standards set a combination of prescriptive and performance-based regulatory requirements and observed that this is appropriate given the nature of public transport provision.²⁶ The Inquiry may find the Review Report useful in informing its considerations.

The Commission supports the establishment of an independent regulator.

It is clear that the complexity of the taxi industry means that it is challenging to ensure that all Victorians, including those with a disability, receive equitable access to taxi services, both in terms of conventional taxis and wheelchair accessible taxis.

Our research that has been undertaken over the past five years indicates the need to regulate:

- Accessibility of taxi services, both wheelchair and conventional, to all Victorians with a disability in metropolitan Melbourne and rural and regional Victoria;
- The timeliness of taxi services and in particular the reliability and accessibility of booking services;
- The responsiveness of taxi services to people with a disability who seek to hail a taxi;
- The safety requirements for people with a disability who use both wheelchair accessible and conventional taxi services;
- The importance of driver training and supporting drivers to provide equitable services to people with a disability;
- The importance of an independent complaint handling system outside of the industry or the regulator to ensure the integrity of providing feedback to the industry;
- Ensuring transparency in the provision of taxi services, as is required in other forms of public transport, in reporting on compliance in relation to waiting times, booking systems, complaints and other indicators of service delivery;
- The role of the regulator in monitoring compliance on the part of the taxi industry, and most particularly compliance under the state legislation in relation to the Equal Opportunity Act, the Charter of Human Rights and Responsibilities and federally under the Disability Discrimination Act 1992.

The Commission strongly supports the strengthening of the independence and regulatory framework for the taxi industry.

Conclusion

People with a disability make up a significant, and increasing, proportion of the population who rely on taxi services to participate in the community, particularly with the ageing of our population.

The taxi industry is required to comply with the Equal Opportunity Act and Disability Discrimination Act to provide an equitable service to people with a disability, yet people with a disability in Victoria still experience discrimination in accessing taxi services on a regular basis.

²⁶ The Allen Consulting Group, above n 4, 107-112

While reforms to the taxi industry over recent years have contributed to improving elements of service delivery relevant to people with a disability, systemic changes are needed to achieve significant progress. The inherent complexity of the current structure of the taxi industry poses many challenges to reform, and also entrenches many systemic barriers to people with a disability accessing taxi services.

This Inquiry presents a major opportunity to analyse the aspects of the industry that contribute to inequity of service provision to people with a disability and to propose the reforms required to achieve greater equality.

The Commission would welcome the opportunity to work with the Inquiry to progress these objectives.

Recommendations

To improve provision of equitable taxi services to people with a disability, the Commission recommends that the Inquiry consider the following issues:

- ***The taxi industry provides a critical service for people with a disability to enable them to participate equitably in all forms of public life. The system needs to provide an equitable service for, and be responsive to, the diversity of people with disability in Victoria.***
- ***Our research demonstrates that people with a disability do not have equitable access to safe, reliable and affordable taxi services in Victoria.***
- ***The Commission's research identifies challenges for people with a disability hailing a taxi due to the unwillingness of drivers to accept a fare from a person with a visible disability or with an assistance animal.***
- ***The Commission's research indicates that people with a disability have unacceptable wait times for both conventional and wheelchair accessible taxis and recent reforms will not necessarily address this challenge with efficiency in the short term.***
- ***The booking system for taxi services does not meet the needs of all people with a disability and different booking systems are required to provide a full range of accessible options for people with a disability.***
- ***The Commission's research indicates positive reports about taxi service provision in rural areas, but this does not address the lack of a full range of public transport options in those areas.***
- ***The Commission strongly recommends that there should be an independent avenue for consumers of taxi services to lodge complaints and that the industry complaint handling services, which should be the first point of complaint, should be more accessible, transparent and available to provide client feedback on utilisation of taxi services.***
- ***Driver training is integral to the provision of safe and good quality service to people with a disability and by implication, this means that drivers should be supported to provide quality services to these people within the Victorian community.***
- ***The Commission has reported concerns about the eligibility criteria for the MPTP imposing economic disadvantage on some groups of people with a disability who utilise taxi services.***
- ***The Commission has made a range of recommendations about improving driver education to ensure better provision for people with a disability and also emphasised the importance of refresher training for drivers.***
- ***The Commission strongly supports the strengthening of the independence and regulatory framework for the taxi industry.***