# Vision Australia Submission to the Multi-Purpose Taxi Program Review

**Authorised by:** Ron Hooton, CEO, Vision Australia

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**Contact:** Karen Taranto

Advocacy Advisor

03 9864 9388

[Karen.taranto@visionaustralia.org](mailto:Karen.taranto@visionaustralia.org)

## Introduction

Vision Australia is the leading national provider of services to people who are blind or have low vision. We provide services to approximately 30,000 Australians each year across 28 offices and outreach locations through a mix of charitable donations and Government funding.

Vision Australia’s mission is that people who are blind or have low vision will increasingly be able to live the life they choose by participating fully in every facet of community life. To help realise this goal, we provide high-quality services to the blindness and low vision community in areas such as:

* early childhood
* orientation and mobility
* accessible information (including library services)
* recreation
* independent living
* Seeing Eye Dogs
* advocacy

### Taxi Travel

Taxi travel is one of the non-optional costs of blindness and low vision. People who are blind or have low vision cannot enjoy the convenience and flexibility of independent car travel, and where other modes of public transport are unavailable or inadequate, taxis are the only viable means of accessing their workplace, educational institution, health and social services, and the community.

Vision Australia is pleased to be able to contribute to the review of the Multi Purpose Taxi Program (MPTP) and to highlight issues, which if addressed, could greatly improve this important program for our clients.

We have made many submissions and representations to inquiries and consultations abut taxi services, in Victoria and other jurisdictions, including the most recent Victorian Taxi Industry Inquiry in 2011, and we have made numerous and repeated recommendations and suggestions aimed at addressing the barriers taxi service users who are blind or have low vision experience. We have seen little evidence of change and the extent and impact of these barriers remain.

Outside of the scope of the MPTP review, these barriers include:

* Taxi drivers who refuse to pick up passengers with Seeing Eye Dogs and other mobility aids;
* Taxi drivers who are not able to find the passenger’s destination and who drop the passenger at an incorrect, often unfamiliar, location;
* High rates of “no shows”, especially for short trips;
* The inability or unwillingness of some taxi drivers to assist passengers to navigate between the taxi drop off point and the entrance of their actual destination;
* Taxi drivers who do not honour state and reciprocal interstate taxi subsidy arrangements;
* Taxi drivers who are unable to communicate effectively, usually because of insufficient English language skills;
* Lack of driver training in how to assist a person who is blind or has low vision;
* Zoning regulations (i.e. “no stopping” zones) which prevent taxis from stopping outside buildings in CBD areas, requiring passengers to navigate their way some distance, most often unassisted, from their drop off point to their actual destination;
* Fare meters, online and App booking systems that are inaccessible to people who are blind or have low vision.

Vision Australia’s responses to the discussion questions for this review follow below.

### How important is it for program users to have fully subsidised public transport?

Subsidised public transport is of utmost importance for program users to participate actively in modern Australian life, whether it is for employment, education, sport, to meet up with friends and family, or do the shopping. People who are blind or have low vision cannot enjoy the convenience and flexibility of independent car travel nor is adequate public transport consistently available. As such, taxi services are often the only way in which people who are blind or have low vision can gain access to community spaces, activities, facilities and services.

Taxi services are an absolute necessity for many people who are blind or have low vision. However, the cost of door-to-door travel can hinder economic, cultural and social inclusion for people who are blind or have low vision.

People who are blind or have low vision are among the most economically disadvantaged in the community. Vision Australia’s Employment Survey conducted in 2012 shows that 64 percent of people who are blind or have low vision are unemployed, not by their own choice, and one third of those who are in paid employment would like to work more hours. Initiatives such as government taxi subsidies are not just a means of making taxi transport more affordable, but are also part of a broader response to the systemic disadvantage experienced by many people who are blind or have low vision.

Victorians who are legally blind already have access to fully subsidised public transport via the Public Transport Victoria Vision Impaired Travel Pass, which is an important factor in ensuring equitable access to public transport. However, a subsidy is not the only motivation for Victorians who are blind or have low vision to utilise public transport over taxi services. Rather, availability, adequacy and accessibility of public transport are equally important. This is discussed in further detail later in this submission.

### Would simpler approaches to splitting fares and supporting journeys where fares have been negotiated in advance enable more group travel?

### What other ideas are there to enable more program users to benefit from cheaper fares by travelling together?

It is acknowledged that simpler approaches to splitting fares and supporting group travel would be beneficial for taxi users participating in regular group activities. Some of our clients do participate in group activities for which they utilise Vision Australia transport services, which are generally provided by volunteers. Vision Australia does not recommend changes to the MPTP which rely on these transport services being available in the long term. Should these services no longer be available, such groups would benefit from simpler approaches to fare splitting.

We understand that currently, many of our clients who are members of the MPTP and engage in group travel on an irregular basis approach fare splitting in mostly informal ways and are predominantly comfortable with this approach. This is particularly true for users of the MPTP who do not have an annual cap on their subsidy.

We understand that many members of our client community prefer to use public transport whenever possible, especially for irregular or ad hoc group travel. Users may use taxi services when they are required to independently take a journey that is irregular, or to a destination with which they are unfamiliar, and may require additional support to accessing premises, such as guiding to the entrance of the destination.

### What are wheelchair users’ current experiences of wheelchair accessible taxis?

### What changes would improve transport for wheelchair users?

Only a small minority of Vision Australia’s clients use wheelchair-accessible taxis, and we therefore defer to other respondents regarding this point.

### What should be considered in reviewing the incentives to support wheelchair transport?

Victorians who are blind or have low vision are considered as high needs users under the MPTP, yet do not have consistent access to the same level of support other high needs users are afforded, such as wheelchair users.

Taxi users who are blind or have low vision may require assistance with wayfinding and accessing unfamiliar premises. Presently, the provision of this assistance by taxi drivers is ad hoc and informal. We understand that many of our clients will engage taxi drivers with whom they are familiar to ensure they may be able to receive this assistance if required.

The Commission should consider incentivising the provision of such assistance for taxi users who are blind or have low vision in a similar way that wheelchair assisted transport is incentivised. This would provide users with assurance that they would receive this assistance if and when they require it.

### Do you think a single access point to information about mobility related services would enhance how people manage their mobility?

Vision Australia staff aim to ensure clients are made aware of various services and programs available to them, including the MPTP. However, many people who are blind or have low vision who are not clients of Vision Australia may find it more difficult to find information about services and programs such as this and others that would benefit them. Indeed, we are aware that some people are not aware of such programs and services until they become engaged in the Vision Australia client community.

We welcome any initiative that would help people better access information about mobility, and indeed other, services relevant to their needs. All information in this regard must be available in accessible formats for people who are blind or have low vision.

We caution against a single access point for information that would indirectly exclude some people. For example, many of our clients do not have access to the Internet or own a smartphone and cannot access information or administration associated with services (such as online applications) via the Internet.

Alternative means of accessing information should remain alongside any proposed single access point, such as via other service providers and existing promotion and marketing of the program.

### Are there ways to better support older Victorians who can no longer drive?

### What other ideas are there to broaden travel options?

Improving public transport accessibility is an important way of supporting Victorians who can no longer drive, including older Victorians and Victorians who are blind or have low vision.

In this case, we refer to public transport accessibility both in terms of the availability of public transport in any given locality as well as safe and independent access for people with disabilities.

Access to reliable end-to-end public transport varies considerably dependent on location, and is especially difficult in regional and rural parts of Victoria. In these circumstances, taxi travel is the only option for people who are blind or have low vision.

We understand the Commission and the Department of Economic Development, Jobs, Transport and Resources (DEDJTR) are exploring partnerships with community service providers to deliver community transport services. While more transport options would be welcome, these generally are better suited to users participating in group activities and may not be available to, or meet the needs of people who are blind or have low vision who wish to travel regularly and independently to education or employment. Public transport and taxi services remain the most appropriate means of transport for this cohort and we hope to see continued investment in and improvement of both taxi and public transport services.

It is acknowledged that ride sharing services such as Uber have entered the market. Anecdotally, we know that some of our clients who have used such services have been happy with the responsiveness and efficiency of these services. Additionally, our client community have reported that Uber drivers have not refused rides, and have been welcoming of Seeing Eye Dogs, which continues to occur in the use of taxi services. One of the distinct advantages of using Uber is in relation to the cashless payment system, which provides assurance for clients of transaction of the correct fare, and eliminates the necessity for users who are blind have low vision to either rely on drivers honesty in relation to correct transaction of cash payments or on the capacity to use electronic payment systems within the vehicle which may or may not be accessible.

At the same time, some people remain hesitant to adopt such services for reasons including tradition, concerns about safety and security of ridesharing services, and lack of access to the smartphone technology required to use Uber and other app-based services. It remains that the great majority of people who are blind or have low vision currently rely exclusively on taxi services to meet their requirements for point-to-point transport, and that services which are not subsidised are unlikely to be viable as regular travel options.

Vision Australia is strongly of the view that ridesharing services such as Uber have a role to play in meeting the travel needs of the community generally, and of our clients who are blind or have low vision in particular. Nevertheless, we are also strongly of the view that such services must be regulated to comply with safety and security standards and other community expectations. While there may be a compelling case for the removal of unnecessary regulatory burdens from the taxi industry, there is no case for a complete absence of regulation, and there is no case for a continuation of the regulatory vacuum in which Uber appears to be operating at present.

Taxis are regarded as public transport for the purposes of the Disability Standards for Accessible Public Transport, and as such are required to meet those Standards. Hire cars and ridesharing services are not covered by the Standards, and it is unclear whether they are covered by disability discrimination legislation such as the *Disability Discrimination Act 1992*. Regulation must provide certainty in this area, particularly regarding access issues such as carriage of Seeing Eye Dogs and provision of accessible information and technological platforms.

### Is there other information about the program that would assist users and their carers in better understanding how it can support their mobility needs?

Vision Australia opposes the imposition of means testing for such an important concession which enables people who are blind or have low vision to access a non-optional means of transport.

Notwithstanding our opposition, the current eligibility criterion requires proof of financial hardship. This must be provided as documentary proof of means. For people who are blind or have low vision, the process of obtaining documentary proof of means can be both burdensome and a deterrent to applying for the MPTP, given the unnecessarily arduous application processes imposed by the Australian Tax Office, and barriers to accessing information and documents in accessible formats in general.

Additionally, it appears that there are no clear guidelines or parameters that applicants can look to in order to determine whether they meet the formal eligibility criteria for financial hardship. At present, it is unclear as to what constitutes financial hardship in order to be eligible for the MPTP. Any thresholds or limits in place to deem eligibility are not transparent. This information would assist users and their carers in better understanding if the MPTP can support their mobility needs as it should.

### What parts of the program would you like to see reported on annually?

### How frequently should user renewal be undertaken?

### How could the impact on users and their carers of a renewal process be minimised?

Some programs require participants to renew their membership periodically. For people whose blindness or low vision is permanent, the need to undertake a renewal process is unnecessary. Additionally, some renewal processes have costs associated, such as obtaining a report from an ophthalmologist or optometrist and obtaining passport photos, which may be unreasonable or even prohibitive for some program members.

There may be a compelling need to implement a renewal process for the MPTP where some medical or health conditions are temporary. To avoid unnecessary administrative or person obtrusion and costs for some of your program members, we recommend differentiating between permanent and non-permanent conditions at the time of initial application and ensuring that a person who is permanently blind or has low vision may be exempt from any renewal processes. It should remain that the card is replaced periodically, without requirement for renewal.

### Are there any reasons not to introduce photo identification on MPTP user cards?

### How could the impact of obtaining photo identification be minimised for users and their carers?

We would welcome the introduction of photo identification on MPTP user cards, for reasons including preventing fraud and suspicion over identity. We would like the Commission to consider raising the status of MPTP user cards as a legitimate means of photo identification as many people who are blind or have low vision have difficulties in producing enough evidence to prove their identity in many settings.

### How could the merits based review panel operate to enhance its effectiveness in considering the needs of citizens that do not meet the formal eligibility criteria?

We recommend that review procedures be transparent and that applicants who require merits based reviews are able to access a review easily. Applicants should be advised of their right to access review at the time a decision is communicated to them. Where an application is rejected, reasons for that decision ought to be provided in writing.

The right to access review is highly relevant where an applicant is rejected on the basis of means and no clear reasons for the decision are provided. Applicants are unable to make attempts to better support their application with further documentary proof of means if they are not provided with the reasons as to why they were rejected in the first place.

Currently, there appears to be no clear process or mechanisms in place for applicants to seek a review(s) of a decision to reject an application, so making the merits based review process more transparent would clarify this. We also understand that proper reasons for decisions to reject an application are not routinely provided to applicants.

Denying an applicant access to the MPTP is a serious one given taxi travel is often the only means by which people who are blind or have low vision can safely access the community. Transparent and easily accessible review procedures (internal, external, and independent) would ensure that the Commission has adequate checking mechanisms in place and ensure decisions are made fairly, consistently, and with transparency.

### What are the factors that should be considered when a program user seeks additional support?

Our client community reports that taxi drivers often do not have the knowledge or skills in assisting a person who is blind or has low vision. In order for taxi users who are blind or have low vision to be assured that their needs for any additional support are met, continuing to improve driver knowledge and skills in providing assistance, and ensuring service delivery to meet additional support needs are consistent should be considered in this review.

There are many obviously unsafe or unreasonable circumstances, such as walking across a busy road or car park to the taxi, where a person who is blind or has low vision requires assistance, but we are aware that taxi drivers do often expect their passengers to negotiate these circumstances without assistance. While there are certainly examples of taxi drivers who do provide an appropriate level of assistance, we are compelled to conclude that there are an alarming number of instances where our clients are put at risk due to insufficient driver training or awareness.

**END**