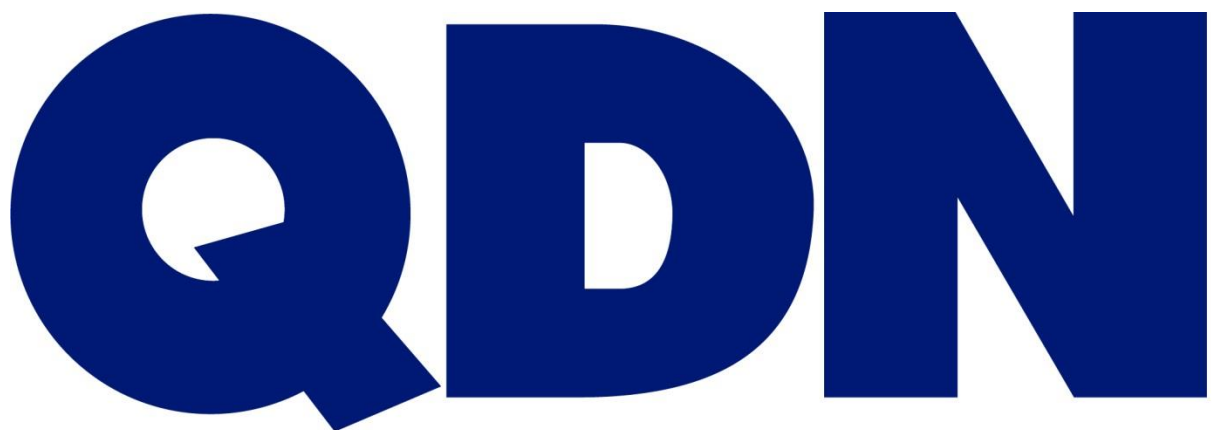

QDN Response to the Opportunities for Personalised Transport (OPT) Review Green Paper



QUEENSLANDERS WITH DISABILITY NETWORK
NOTHING ABOUT US WITHOUT US

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About Queenslanders with Disability Network (QDN)

Queenslanders with Disability Network (QDN) is an organisation of, for, and with people with disability and the organisation's motto is "nothing about us without us." QDN operates a state-wide network of members who provide information, feedback and views from a consumer perspective to inform systemic policy feedback to Government and peak bodies. QDN also provides information and referral support to people with disability.

QDN has over 700 members and 500 supporters across Queensland. All of QDN's voting members are people with disability.

Value Statement on People with Disability

QDN's work in providing feedback and input into systemic policy issues is based upon the organisation's core values and the place of people with disability in an inclusive, Australian society.

QDN believes that:

- All people with disability have a right to a place in the community and have contributions to make to community. This is as empowered, free citizens who are as valued, present, participating and welcomed as members of any dynamic and diverse society.
- The place of people with disability in the community is not just about people with disability having a house in the community. Core to this is that they are welcomed in the community as ordinary citizens where they are genuinely given opportunities to contribute and actively participate. People with disability need to be in communities where their individuality, their talents, and their lived experiences of disability are recognised and acknowledged.
- Culturally and historically, people with disability are not afforded the same value, opportunities or access to community life.
- Any inclusion in community for people with disability is conditional and vulnerable to withdrawal.
- Many people with disability in Queensland are excluded from the most basic experiences of ordinary lives.
- Current exclusionary practices are unacceptable and must be challenged.
- These issues affect not only people with disability but the whole community.
- The responsibility is shared. It lies within government (federal, state and local) and the community at large, to ensure that people with disability have a place and are resourced to belong in community.

QDN Consultation and this submission

A small consultation to inform this submission was undertaken by QDN with its members with specific interest in accessible public transport systems. This submission contains feedback from interested QDN members, Group Convenors, Regional Facilitators, and Board Directors.

About this Submission

Queenslanders with Disability Network (QDN) accepts in principle that rideshare services should be part of a personalised transport industry that is both well-regulated and fair for operators and customers. This in principle acceptance comes with caveats. Issues that are of importance to our members are listed below.

Vehicle Accessibility

Wheelchair Accessible Taxis (WATs) need to conform to the relevant sections of the *Disability Standards for Accessible Public Transport-2002* (DSAPT). Rideshare vehicles that operate as WATs, such as those proposed for UberWAV, must also meet the DSAPT in every regard.

Vehicle Safety

Rideshare vehicles, WATs and other vehicles, must be safe and fit for purpose. QDN could accept nothing less for rideshare vehicles than the current safety standards required for taxis.

Proportion of WATs in the Rideshare Fleet

The OPT Green Paper states that of 3260 taxi licences in Queensland 642 are for WATs. This represents approximately 20% of the fleet as WATS. Rideshare operators and companies need to ensure that the proportion of WATS in the rideshare fleet does not fall below 20%, with the distribution of WATS being in this proportion in the various areas in which the rideshare operates. This will ensure that disproportionate concentrations do not occur and that QDN members in all parts of Queensland have an equal opportunity to hire a rideshare WAT.

Rideshare in Regional Areas

QDN strongly supports the proposal to introduce rideshare services in regional and rural areas. This is particularly the case where vehicles that are suitable as WATs would become available. A part time rideshare operator may well be viable in areas where full time taxi driving is not.

Infrastructure Accessibility

QDN members who use WATs have long complained that most taxi ranks and passenger loading zones are not accessible due to the continuous kerb. This necessitates hazardous journeys along the carriageway to find a break in the kerb after aligning via the rear platform lift or equally hazardous forays in the traffic to reach the WAT so that the member can board. This is unsafe and unacceptable. Rideshare services may not use taxi ranks but they do use passenger loading zones. QDN strongly recommends the Department of Transport and Main Roads require that all local authorities ensure the accessibility of taxi ranks and passenger loading zones.

Accessibility of ranks and loading zones includes their convenience of location. Placing them on steep topography or in concealed or difficult to reach areas is unacceptable. Rather, they should be located adjacent to popular destinations in an obvious and accessible location.

Driver Suitability

QDN strongly recommends Rideshare drivers hold driver authorisation as per the requirement for taxi drivers. People with disability are particularly vulnerable to abuse and exploitation. QDN could not accept a regulatory regime that did not strictly assess potential rideshare drivers for suitability.

Driver Training

In discussing the matter of disability awareness training or disability customer service training with current Uber drivers, none of the drivers had received any training. This is a major omission. All rideshare drivers should be obliged to complete disability awareness training and disability customer service training prior to authorisation. Refresher courses should be undertaken to maintain authorisation.

Clear communication, backed up by the necessary training, is a mandatory requirement for all drivers as effective communication between driver and passengers who are vulnerable is essential.

Existing taxi companies throughout Queensland are required to enforce the Guide, Hearing and Assistance Dogs Act (2009). Taxi drivers are aware of their responsibility toward passengers accompanied by service dogs. They are also aware of the dire consequences of incurring a penalty of \$60,000 should they refuse service dogs into their vehicles. Similarly, all Rideshare drivers need to undergo adequate training and be familiar and fully understand the Guide, Hearing and Assistance Dogs Act (2009).

Many disabilities are hidden or not immediately apparent. Not all people with mobility impairments use wheelchairs and not all people with vision impairments have long white canes or guide dogs. QDN members who are deaf or hearing impaired, have low vision, cognitive / psychological / intellectual disabilities are usually indistinguishable from any

other community member. Their customer service needs still need to be recognised, and only with adequate training can taxi or rideshared drivers be reasonably expected to deliver this.

Driver Responsibility

A complaints mechanism that accepts service / driver complaints and responds with outcomes and resolutions in a timely manner is required for both the taxi industry and rideshare services. QDN members who make complaints about drivers or service are not always informed of the outcome of their complaints. This does little to instil confidence in the complaints system. Rideshare services need to also offer a responsive complaints process.

A means of audio-visually recording journeys is required for both taxi and rideshare vehicles. This will serve as a disincentive for both poor behaviour and vexatious complaint. The recorded material should be archived for a reasonable period before it is disposed of.

Payment of Fares

QDN has many members who are not able to pay fares using electronic system or credit cards. If rideshare services are limited to these payment options many QDN members will be excluded from the service. A variety of payment options need to be available to our members, most of who are currently able to easily pay taxi fares. Rideshare operators need to offer a variety of payment methods not less than that currently offered by the taxi industry.

Taxi Subsidy Scheme (TSS) to Extend to Rideshare Services

QDN has many members who are eligible for taxi subsidy via the TSS. The TSS is valid in Queensland and through Interstate Vouchers is also valid in the other States and Territories of the Commonwealth. TSS subsidy needs to extend to rideshare services, both in Queensland and when travelling interstate.

Booking Systems

QDN strongly recommends Rideshare services be able to be booked by other modes than via smartphone apps. Limiting booking to apps discriminates against QDN's many members who are not able to operate smartphones. The taxi industry currently allows booking via websites, telephone or smartphone apps. Rideshare services should also allow booking through a diversity of methods, with the taxi industry options as the minimum standard.

Braille Signage to Extend to Rideshare Services

QDN has members who are blind and who read Braille. Passengers who are blind may make a quick reference to identify the cab number prior to entering a taxi vehicle. Existing taxi companies in metropolitan areas are required to have their car number in Braille on the front passenger door immediately beneath the handle. For instance, Black and White cabs have the letter “B” brailled followed by their 3 digit number. Yellow cabs have the letter “Y” brailled followed by their 3 digit number. Similarly it is proposed that this tactile system be extended to all regional and rural areas throughout Queensland. It is proposed that rideshare operators and all Uber vehicles need to be able to be identified by the letter “U” brailled followed by their designated number. This will ensure quick identification for passengers who are blind.

Good Geographical Knowledge

While many taxi companies utilise GPS’s for navigating to the shortest route, it is advantageous for taxi drivers as well as rideshare drivers to have a good working knowledge of the local area. QDN is concerned that passengers who are either blind/vision impaired, nonverbal or unable to speak up may be vulnerable to drivers choosing a longer route and therefore receiving a greater fare.

Queenslanders with Disability Network – 10 June 2016.