

# **Submission to the Review of the 2008 Tax Network Standards**



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**Council of Social Service of NSW (NCOSS), 66 Albion Street, Surry Hills 2010**

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## **NCOSS Recommendations**

1. That there are key performance measures introduced for rank and hail taxis and that this includes customer feedback.
2. That there is a key performance measure introduced around short journey hire in order to reduce the levels of refusal of service.
3. That customer satisfaction becomes a key performance indicator and that these are conducted by the Government on a 6 monthly basis, with the results produced publicly.
4. That in addition to the above recommendation there is reporting of the steps that the taxi operator is taking to address any concerns raised in the survey. A follow-up evaluation must also be provided to demonstrate that the taxi operator has addressed the issues.
5. That the Government works with Local Government, the taxi industry and relevant stakeholders to ensure the accessibility of taxi ranks and that this is reported on and measured.
6. That there is a key performance measure to determine the service provided to people with hearing and speech impairments when making phone bookings.
7. That the questions/definitions for the key performance indicators are publicly available and located with the key performance indicator reporting on Transport NSW website.
8. That all data provided is disaggregated by area and by provider.
9. That data must be collected and reported on from every area to enable the comparison of data across areas and services.
10. That government reporting standards and regulation in regards to Wheel Chair Accessible Taxis (WATs), needs to be strengthened and continue to be publicly reported.
11. That WAT response time statistics should be collected for all areas (metropolitan, regional and rural) and that the times should be disaggregated and reported publicly.
12. That other measures of service levels for WAT, as well as response times, should be recorded and publicly reported. This would provide a more thorough indication of taxi performance. For example it would be very helpful to have information about

complaints received from WAT users so that issues particular to these customers could be recorded, such as issues related to loading and unloading.

13. That the Network Standards for taxis in country areas are reviewed in consultation with providers and users, are actually finalised and reporting on Key Performance Indicators for country areas commences and is publicly reported.

## **1. About NCOSS**

The Council of Social Service of NSW (NCOSS) provides independent and informed policy development, advice and review and plays a key coordination and leadership role for the non government social and community services sector in New South Wales. NCOSS works with our members, the sector, the NSW Government and its departments and other relevant agencies on current and emerging (and ongoing) social, systemic and operational issues.

NCOSS has a vision for a society where there is social and economic equity, based on co-operation, participation, sustainability and respect.

NCOSS membership is composed of community organisations and interested individuals.

Affiliate members include local government councils, business organisations and Government agencies. Member organisations are diverse, including unfunded self-help groups, children's services, youth services, emergency relief agencies, chronic illness and community care organisations, family support agencies, housing and homeless services, mental health, alcohol and other drug organisations, local indigenous community organisations, church groups, peak organisations and a range of population-specific consumer advocacy agencies.

## **2. About TPAG**

The NCOSS Transport Policy Advice Group (TPAG) consists of individuals and organisations that are committed to addressing transport disadvantage in NSW. TPAG identifies systemic issues that emerge for transport policy that affect access and equity for disadvantaged communities. It provides a forum for ideas and discussion on transport issues that may impact on policy. TPAG also provides advice and expertise to NCOSS on emerging issues for the transport sector and on the interests and transport needs of communities. TPAG aims to work with all levels of government to develop effective transport responses with particular focus on the needs of disadvantaged communities.

Current members of TPAG are:

Community Transport Organisation	Western Sydney Community Forum
Northern Rivers Social Development Council	Easy Transport
Cancer Council NSW	People with Disability (NSW) Inc
Lower North Shore Community Transport	Rail, Tram and Bus Union
Action for Public Transport	Positive Life
Aged Care Alliance	Council on the Ageing

Input and advice from TPAG has informed this submission.

### **3. Introduction**

Taxis provide a flexible 24-hour responsive transport mode performing a range of important functions within the greater public transport network. For many passengers, a taxi provides a premium rate alternative to public transport services or the use of a private vehicle. These users are likely to choose a taxi because of its relative speed, convenience or comfort over other transport modes.

There are also a number of passengers who use taxi transport because other forms of transport are not readily available or are not accessible. A significant proportion of these users are people on very low fixed incomes, including older people and people with disability, who use taxis to get to important destinations (including health related appointments).

NCOSS believes that careful regulation and monitoring of the taxi industry is required so that all passengers receive the same level of safety, reliability and service performance.

NCOSS also supports public reporting of Taxi performance against performance standards. Further, given the anecdotal evidence available of the poor performance of WAT services, there is a strong case for enhanced public reporting of the performance of WATs. In particular, data should be collected which can test the ability of operators to improve performance to ensure that it is equivalent to standard service response times.

Due to NCOSS focus on transport disadvantage we have only addressed some of the Key Issues. We believe that there are a range of other organisations that can provide a more detailed response on the other issues.

## **4. Key Issues**

### **4.1 Relevance of current KPIs (standard taxi and WATs)**

There are a number of areas where NCOSS believes additional Key Performance Indicators are needed in order to provide a more comprehensive picture of the standard and quality of the taxi service being provided. These should be applied across all taxi services and across all areas – metropolitan, regional and remote.

#### **4.1.1 There is no data about rank and hail taxis and this is often where people have the most difficulties.**

During TPAG discussions members reported on a range of issues that they or their members had experienced. This included driver's refusing to pick the person up as it is hand-over time or the person was going in the wrong direction to their hand over destination.

Other issues include taxi drivers not dropping the person to their destination. One example is of a driver asking the passenger to leave the taxi as he didn't know where Mallett St in Sydney was. He refused to drive any further and the passenger had to leave the vehicle on a main road in the rain. Another example in Western Sydney is where a driver refused to drive down a short, well-graded flat dirt road as he had just had his taxi washed and did not want to get it dirty.

A common concern raised by NCOSS stakeholders is the difficulty faced by passengers who are frequently refused hiring as a result of a request for a short journey. This can have an adverse impact on some people with mobility impairment who depend on taxis to access services in their local areas.

### **Recommendations**

1. That there are key performance measures introduced for rank and hail taxis and that this includes customer feedback.
2. That there is a key performance measure introduced around short journey hire in order to reduce the levels of refusal of service.

#### **4.1.2 Customer satisfaction must be a key performance indicator**

There appears to be no publicly available data on customer satisfaction yet this is an important aspect of the delivery of taxi services. It does not matter how timely a service is if the driver is unhelpful or the taxi is dirty or as noted above the person is not given a full service. On the other hand if the service is exceptional, and NCOSS is aware of taxi drivers who have gone out of their way to assist people, then this too needs to be acknowledged.

However NCOSS believes that customer satisfaction surveys should be conducted by Government. There are two reasons for this:

- It maintains the independence of the survey – people are more likely to be open and honest if their responses are given to a body independent of a service or industry they are commenting on. People can have the perception that they will be 'punished' in some way if it is the provider themselves doing the survey and the person is negative about the service.
- Some taxi operators, especially in regional, rural and remote areas may be very small (i.e. one to two people). This means that the operator will not have the resources to do the survey. People in these areas may not be willing to be open as the operator may be able to easily identify who said what.

## Recommendation

3. That customer satisfaction becomes a key performance indicator and that these are conducted by the Government on a 6 monthly basis, with the results produced publicly.
4. That in addition to the above recommendation there is reporting of the steps that the taxi operator is taking to address any concerns raised in the survey. A follow-up evaluation must also be provided to demonstrate that the taxi operator has addressed the issues.

### 4.1.3 Accessibility as a key performance indicator

There is also little or no data available about the accessibility of taxi ranks. The Draft Report of the *Review of the Disability Standards for Accessible Transport* notes some key concerns about the accessibility of taxi ranks:

- i. uncertainty about the supply of a WAT at a rank and the possible inaccessibility of the rank
- ii. people with visual impairments reporting problems with patchy and incorrect use of tactile ground surface indicators<sup>1</sup>

It is acknowledged that ensuring accessible taxi ranks is the responsibility of the local government. NSW Transport, Taxi Industry and relevant stakeholders need to work closely with local government to ensure compliance.

Another issue of accessibility is the ability to make a booking. People with hearing and speech impairments have noted difficulties with booking taxis especially if the booking service uses voice recognition software.

## Recommendations

5. That the Government works with Local Government, the taxi industry and relevant stakeholders to ensure the accessibility of taxi ranks and that this is reported on and measured.
6. That there is a key performance measure to determine the service provided to people with hearing and speech impairments when making phone bookings.

## 4.2 Changes in Performance Targets

The Ministry of Transport Website provides information on taxi key performance indicators. However the data is limited and it is clear that there is very little transparency around reporting. To further reduce transparency by having a 'traffic

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<sup>1</sup> Allan Consulting Group, *Op.Cit.*, p.48.

light' system would make it even more difficult to determine the actual standard of service within areas and across NSW.

#### **4.2.1 The questions or definitions that guide response to Key Performance Indicators (KPIs) are not available to the public, making analysis of the data difficult.**

On the Transport NSW website where performance data is reported such as the percentage of people picked up within 15 minutes there are four columns Q1 – Q4 underneath. Searching through the website it was impossible to discover what these questions are. The Appendix to the Issues paper is the first time that NCOSS has seen more detailed information about what is being measured.

##### **Recommendation**

7. That the questions/definitions for the key performance indicators are publicly available and located with the key performance indicator reporting on Transport NSW website.

#### **4.2.2 Data must be disaggregated**

The available data is aggregated which means that what is reported is the average across Sydney or Wollongong, Newcastle and the Central Coast. It is therefore exceedingly difficult to know if one area is providing a better service than another or one provider is better than another.

##### **Recommendation**

8. That all data provided is disaggregated by area and by provider.

#### **4.2.3 Reported data must be comparable**

If you read the notes at the bottom of the Transport NSW web page on KPIs for WAT Taxis in Wollongong, Newcastle and the Central Coast, some of the graphs do not include data from every area. This makes comparison of data difficult.<sup>2</sup>

##### **Recommendation**

9. That data must be collected and reported on from every area to enable the comparison of data across areas and services.

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<sup>2</sup> NSW Government, Transport and Infrastructure, *Wheelchair Accessible Taxi (WAT) Performance Against Network Standards – Newcastle, Wollongong and Central Coast Networks*, July 2008-June 2009, <http://www.transport.nsw.gov.au/taxi/performance-indicators-region-wat.html>, viewed 14 January 2010.

### 4.3 Reporting basis for WATs

Following is a rough estimation comparing the average response times between reporting areas and general taxis and WATs.<sup>3</sup> It shows that WATs continue to fail to meet the key performance indicators of providing a pick-up within 15 minutes (standard is 85%) and 30 minutes (standard is 98%):

Time	Sydney	Sydney WAT	Newcastle, Wollongong and Central Coast	Newcastle, Wollongong and Central Coast WAT
Pick up within 15 minutes	93.4%	78.1%	93.3%	81.9%
Pick up within 30 minutes	99.3%	95.8%	98.6%	94%

It is important to note that response time statistics for Sydney are only available for the Sydney Metropolitan Area (not the broader Sydney region).<sup>4</sup>

Given the large volume of evidence available on the inadequate levels of service available to wheelchair users, there is a strong case for enhanced public reporting of the performance of WATs against the current service standards. Performance data should also include the availability of WATs during peak hours in metropolitan and country areas, by measurement of average and median waiting times for services.

While this is not a common occurrence NCOSS is aware that people with assistance animals can face difficulty in obtaining a taxi, especially if they are trying to hail one on a street. The driver notices the assistance animal and then drives past or, if they do stop, refuses access to the animal. It may be that drivers need to be regularly reminded of the requirements of the *Passenger Transport Regulation 2007* (NSW) that states that a driver cannot refuse to carry an assistance animal.<sup>5</sup> This could be reported on under a key performance indicator for rank and hail taxis under section 4.1 above.

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<sup>3</sup> This estimation is based on averaging the performance times across each of the Key Performance Indicators reported on the Transport and Infrastructure website.

<sup>4</sup> *Ibid.*

<sup>5</sup> *Passenger Transport Regulation 2007* (NSW), Division Three, Section 44(4).

## **Recommendations**

10. That government reporting standards and regulation in regards to Wheel Chair Accessible Taxis (WATs), needs to be strengthened and continue to be publicly reported.
11. That WAT response time statistics should be collected for all areas (metropolitan, regional and rural) and that the times should be disaggregated and reported publicly.
12. That other measures of service levels for WAT, as well as response times, should be recorded and publicly reported. This would provide a more thorough indication of taxi performance. For example it would be very helpful to have information about complaints received from WAT users so that issues particular to these customers could be recorded, such as issues related to loading and unloading.

### **4.4 Application of standards to country taxi networks**

NCOSS is concerned that there are still no finalised Network Standards for taxis operating in country areas. Interim Standards were introduced in 1993 and still remain as interim standards 17 years later.

These standards will need reviewing before they are implemented. It is essential that country taxi providers and people who use taxis in country areas are involved in this process.

#### **Recommendation**

13. That the Network Standards for taxis in country areas are reviewed in consultation with providers and users, are actually finalised and reporting on Key Performance Indicators for country areas commences and is publicly reported.

## **5. Conclusion**

NCOSS has long advocated for better and more publicly available data on taxi network performance. We welcome this opportunity to provide feedback on the review of network standards and look forward to a more accurate performance indicator regime.