

Transport Disability Incentives and Subsidies

Review:

NCOSS Submission

November 2017

About NCOSS

The NSW Council of Social Service (NCOSS) works with and for people experiencing poverty and disadvantage to see positive change in our communities.

When rates of poverty and inequality are low, everyone in NSW benefits. With 80 years of knowledge and experience informing our vision, NCOSS is uniquely placed to bring together civil society to work with government and business to ensure communities in NSW are strong for everyone.

As the peak body for health and community services in NSW we support the sector to deliver innovative services that grow and evolve as needs and circumstances evolve.

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Introduction

NCOSS is grateful for the opportunity to comment on the *Transport Disability Incentives and Subsidies Review Discussion Paper*. At the outset, we would like to congratulate Transport for NSW (TfNSW) on initiating this process of review, as access to transport is a crucial foundation of choice, control and the full inclusion of people with disability in the community. While the recent increases to the level of subsidies under the Taxi Transport Subsidy Scheme (TTSS) and Wheelchair Accessible Taxi (WAT) scheme are welcomed, NCOSS believes that a more comprehensive review of subsidies and incentives is required to ensure that the TfNSW effectively address the transport disadvantage faced by older people and people with disability.

In conjunction with members of our Transport Policy Advisory Group, NCOSS have identified a number of concerns:

- The terms of reference do not consider the National Disability Insurance Scheme (NDIS) and its impact on the provision of community transport services for people with disability. NCOSS submit that adequate consideration must be given to NDIS to properly evaluate the adequacy of incentives and subsidies for people with disability and their access to point to point transport.

The changes involved in the transition to the NDIS have significant potential to result in a loss of access to transport services for people with disability. Point to point subsidies and incentives are a key mechanism by which sustainable, long term access to transport for people with disability, can be enabled. NCOSS believe it is crucial that the NDIS be given significant consideration as part of this review.

- NCOSS is further concerned that there is a lack of reliable, detailed and up-to-date qualitative and quantitative data on the subsidy and incentive schemes, and the broader usage of transport by people with disability. Such data is crucial in undertaking a review of the effectiveness of supports and informing a proper analysis of the experience of people with disability in accessing transport services.

We are particularly concerned with unpublished (and unverifiable) internal survey report data from the 2013 'Wheelchair Accessible Taxi Customer Research Report' being relied upon as a key data source. NCOSS notes that at the time that there was a briefing around this research the results quoted were significantly at odds with the results obtained from research that was jointly endorsed by NCOSS Spinal Cord Injuries Australia, Physical Disability Council NSW and the Northern Rivers Disability Transport Taskforce.¹

Accordingly, as part of this review process, and on an ongoing basis, NCOSS recommends that the following quantitative and qualitative data is collected and made public:

- Data broken down by M40 and M50 users.
- Data that recognises whether users are independent or travel with an informal carer.
- Data broken down by key demographics of users, including age, income source and level, postcode, employment status.

¹ Northern Rivers Social Development Council. TTSS: the Shrinking Circle: Report on a survey of NSW Taxi Transport Subsidy Scheme Users, 2013.

- Trip type, frequency and fare data, with a focus on:
 - Top 3 destinations for users
 - Average number of trips per week
 - Average fares (before subsidy application) for most common trips
 - Average fares (before subsidy application) for most important trip per week
 - Average fares (before subsidy application) for most expensive trip per week
 - Average response wait times
 - Customer service feedback data, with added weighting given to negative feedback on service delivery issues.

We understand that the potential implementation of an electronic TTSS payment system is likely to facilitate improved data collection. However, in the interim, any effective review of the system of supports and subsidies must be based on a significant foundation base of current information.

In our submission, NCOSS will respond in detail, directly to each of the questions posed in the discussion paper.

Taxi Transport Subsidy Scheme

1. How is the current scheme (TTSS) being used and what is it being used for?

NCOSS is concerned that there is insufficient up-to-date quantitative and qualitative data on the current (and historic) use of the TTSS scheme. The discussion paper quotes figures from an unpublished report that is nearly 5 years old, the results of which were questioned by disability stakeholders at the time. While people with disability and the organisations representing them can provide important anecdotal evidence contributing to the qualitative data set, a comprehensive review of the scheme requires larger scale qualitative data and actual quantitative data on the usage of the TTSS and WAT to assess its effectiveness.

NCOSS recommends that the next stage of this review process involve the commencement of a process to collect quantitative and qualitative data. This process should examine both the operation of subsidy and incentive schemes, and the broader experience of people with disability utilising point to point transport. It must include specific focus on seeking feedback from people with disability who do not utilise subsidies or utilise point to point transport, to identify possible weaknesses, barriers and opportunities for improvement.

2. How well does the current voucher system work?

While NCOSS is supportive of the current subsidy scheme and has advocated consistently for its retention, the current voucher system, and the way that it operates is problematic for many people with disability. Some of the well-documented issues with the operation of the current voucher system include:

- The inability of many people with disability to complete the vouchers independently, either due to physical disability or visual impairment, or intellectual disability. This often places the user in a more vulnerable situation, having to rely on drivers to sign and complete payment for them. In the context of consistent feedback regarding problematic or improper driver behaviour, the current voucher system is potentially a significant barrier to accessing point to point transport, and a source of potential fraud or misuse of the system.

Example 1

Pauline has low vision and cannot see the fare on the taxi meter, or the amount the driver writes on the voucher. She is able to sign the voucher, but doesn't really know what she is agreeing to.

'I sign the voucher, but don't know what's been written on it. I can't see what's on the metre anyway'
(Pauline, visual impairment)

Example 2

John can write with a specialised pen, but because drivers are often impatient and unfriendly, he prefers to say he "cannot sign". He can read the meter, but often doesn't know what amount the drivers fill in. If a driver filled in an inflated amount, he wouldn't be able to stop them anyway.

"I can sign with a specialised pen, but can't write the fare in so it's just easier to say that I am unable to sign. I can see what the fare's cost me - often with loading time included - but have to trust what the driver is filling in. When I tell drivers to turn the meter off while loading my wheelchair they get annoyed, i'm guessing it would be even worse if I challenged a fare" (John, wheelchair user)

- The current voucher system is complicated for many people to use and has a significant ongoing administrative requirement, with vouchers needing to be re-ordered on a regular basis.

Example 3

Jenny has intellectual disability and finds the number of boxes on the voucher too complex. It's easier to pay what the driver tells her.

3. Does the driver incentive affect responsiveness to wheelchair jobs?

It is likely that driver incentives have had a positive impact upon the responsiveness of WAT drivers to requests for wheelchair jobs. However, feedback from people with a disability and those who support them suggest that availability of Wheelchair Accessible Taxis (particularly in rural and regional areas of the state) is an ongoing problem. People with a disability still experience long wait-times for WAT jobs and issues with the acceptance of WAT jobs (particularly for short distance jobs). NCOSS believes that the next stage of this review should involve a significant qualitative survey on the experience of WAT users, and collection of detailed data on WAT response times and job pick-up rates.

NCOSS further submit that there is significant scope for improving the system of subsidies and incentives and recommends a more holistic approach to improving WAT driver responsiveness. NCOSS suggests the following:

- Minimum standards of driver education and training in the safe and appropriate provision of services to people with a disability. This education and training must go beyond in the operation of on-board wheelchair related machinery, to focus on attitudes, behaviour and communication towards people with disability (specific recommendations regarding the nature of training are given in response to question 26).
- Potential for payment of differential driver incentives, with a higher driver incentive payment paid to drivers with a higher standard of attainment in training in the delivery of services to people with a disability.
- Potential for performance standards to be linked to differential driver incentive payments. For example, where drivers with a higher percentage of WAT job completions, in conjunction with positive customer feedback, receive a higher incentive payment.

- Performance standards connected to differential payments, setting a higher minimum of the percentage of WAT jobs required to be completed to retain a discounted WAT licence and access to incentive and subsidy payments.
- Performance standards that are linked to penalties for drivers who do not accept a minimum number/percentage of WAT jobs.

4. Has the increase in the driver incentive payment affected wait times for wheelchair accessible taxis?

There is currently no significant evidence or anecdotal input from people with disability, or the organisations who support them, to suggest there has been a statewide improvement in wait times for Wheelchair Accessible Taxis. People with disability still commonly report issues with obtaining a WAT when required, particularly in rural and regional NSW, with long wait times being common. NCOSS believes that comprehensive collection of quantitative data by postcode or local government area is required to determine the degree of impact that driver incentives have had upon service delivery. For example, further data is needed on where improvement has occurred, what areas and what type of jobs are most problematic.

5. Has the payment of the driver incentive for scheme participants affected responsiveness to wheelchair users who are not scheme participants?

Refer to the response for the previous question.

6. How do existing incentives affect the commercial viability of operating a wheelchair accessible service?

NCOSS will reserve comment on matters relating to the financial viability of WAT services until the completion of the independent assessment. However, NCOSS recommends that this assessment findings be made public and open for comments from the wider community as part of the next stages of this review process.

7. Have incentives been effective at ensuring an adequate supply of wheelchair accessible vehicles?

It is likely that incentives have had a positive influence on the accessibility of Wheelchair Accessible Vehicles and that WATs are more available than would be the case without the payment of incentives. However, it is also true to say that there is still a significant shortage of WAT vehicles, particularly in many rural and regional areas. The discussion paper itself suggests that the various incentive measures have not resulted in any significant change in the number of WAT licences, which have remained relatively static at 930.

As previously noted, NCOSS would like to see more comprehensive data in relation to the number of WAT taxi licenses, WAT taxis and WAT trips taken, collected and made public, as part of the next stage of this review process. This data should be broken down by local government area and provided over time to give an indication of any changes as a result of alterations of incentive schemes. Further, this data should include a significant survey of people with disability to collect qualitative data on wait times, perceptions of availability, an indication of 'jobs not taken' due to lack of availability, and perceptions of change over time.

In broad terms, it is true to say that incentive measures could be improved, as we have outlined in response to other questions, particularly if combined with measures to improve and monitor driver standards, and sanction poor behavior or unacceptable responsiveness to WAT jobs.

8. Is the additional cost of purchasing and modifying a wheelchair accessible vehicle a significant cost barrier to new entrants to the market?

As previously noted, NCOSS hopes that the independent assessment of the financial viability of WAT service will be made public and will provide the basis for determining measures to address any potential barriers to entry for new WAT service providers. However, NCOSS believes that consideration should be given to enhancing existing measures to remove potential cost impediments to the entry of new WAT providers, including:

- Extending access to No Interest Loans (NILS) to include service providers other than holders of Taxi licences. Particular consideration should be given to including Community Transport Service providers.
- Undertake an examination of the potential cost benefit of having a centrally contracted entity undertake conversion and provision of WAT vehicles to:
 - sell to potential providers (with access to NIL schemes to help facilitate such arrangements); or
 - lease to operators wishing to be registered to provide WAT services. This arrangement may be particularly applicable in rural and regional areas where the high level of initial investment, in conjunction with a potentially 'thin' market, may be acting as a significant barrier to the entry of smaller, new WAT providers.
- Incentive payments to operators/owners of wheelchair accessible vehicles, according to the number of hours that their vehicle is actively available (as detailed in response to question 22).

9. Would the funding be better spent on other incentive measures?

NCOSS believes that the current subsidies and incentives provide a positive basis on which to improve. With a centralised booking service, the introduction of a smart-card or other electronic system for the payment of user subsidies, presents an opportunity to enhance incentive measures and better link the payment of incentives to operator and driver performance. In this context NCOSS believes consideration should be given to:

- Minimum driver incentive payments continuing to be made to all WAT vehicle drivers who meet minimum service provision targets (ie: drivers who meet the benchmark minimum percentage of accepted and completed WAT jobs, measured on a monthly or quarterly basis).
- Differential incentives being paid to drivers who complete a higher percentage of WAT jobs (ie: percentage of jobs accepted and completed, compared to jobs offered).
- Differential incentives being paid to drivers who meet higher standards of driver training, and performance, potentially including an element of user ratings or feedback.

10. How do you book wheelchair accessible taxis in Sydney?

NCOSS recognises that there is much anecdotal evidence to suggest that some people with disability make direct connection with WAT drivers who they feel more comfortable with, and prefer to be able to use them for regular journeys where possible. However, the centralised booking service is the most common means of booking taxi transport for people with disability.

11. When and how often do customers use the centralised booking service?

NCOSS recommends that the next stage of the review include a comprehensive user survey of people with disability who utilise the central booking service to obtain detailed and comprehensive data around this

question. This will ensure an appropriate (and public) evidence base for any reform to the operation of the service.

12. Which organisations are using the centralised booking services to make bookings on behalf of their clients?

NCOSS recommends that this question be included in information to be sought through a significant survey of people with disability and their service providers, as part of the next stages of this review.

13. Are you satisfied with the service provided by the existing service provider?

While most people with disability find the central booking service the most effective way to arrange their travel, many continue to express frustration and dissatisfaction with the way that the current service is provided. Many experience issues with functionality, making the service difficult, time-consuming and sometimes leaving them feeling embarrassed, stressed or frustrated. Common issues highlighted by people with disability who use the service include:

- Operator having to ask the same simple questions every time a call is made.
- A lack of communication between drivers and operators, with information on arrival times and delays often absent or inaccurate.
- Driver attitudes, communication and behaviour during notification and pick-up being inappropriate or offensive.

Example

Josh catches the taxi home from work each evening. His colleagues are bemused that he has to give the contact centre the same details each time (he's used to it.) There is one staff member who seems to know Josh's details on the system, she just asks "are you going home?", saving a lot of time. At least the call centre music means it's nearly the end of the work day.

"I catch a taxi home from work each day, and it's so irritating having to tell the operators the same details over and over again, yes, my wheelchair still fits all taxi's. Sometimes there is an operator who DOES seem to remember all my details; they just say "are you going home?", makes it so much easier. If some staff can do it, there must be something in the system. I think all operators? should have to retrieve a customer's details"
(Josh, wheelchair user)

We will address potential measures to improve the operation of the centralised booking service in response to question 24.

14. 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?

NCOSS has broad concerns about fare deregulation and its potential impact upon the value and effectiveness of the subsidy, which we will address in question 17.

In addressing the fundamental appropriateness of a 50% subsidy up to a cap of \$60, NCOSS believes that the transition to an electronic system for payment of subsidies and incentives should involve consideration of measures to improve the flexibility and function of the subsidy payment. This should include:

- An ability for people who rely on taxis as their only form of suitable transport to claim a higher subsidy under the same capped dollar amount. NCOSS submits that a 75% subsidy in these situations is appropriate.
- Ability for all users to select the percentage of subsidy for any particular trip, under the same capped dollar amount, up to 50% for most users, and 75% for users who rely wholly upon point to point transport.
- The introduction of a set number of 'excess trips' per user per year. These excess trips could allow a user to claim up to 100% of the cap of \$60, or potentially a higher cap amount. This could operate under the same principle as the current scheme which allows 'gold card' pensioner rail travel anywhere in the state a number of times each year. Such a scheme would be particularly important for people with disability in rural, regional and remote areas where the current scheme still leaves many longer trips unaffordable.

15. Should passenger subsidies be available for use for any journey that is a point to point transport journey under the new regulation?

NCOSS is broadly supportive of expanding the availability of passenger subsidies to cover all point to point journeys. However, NCOSS has concerns about potential pricing implications with some current service delivery models, particularly in relation to the application of deregulated fares for booked services, which we will address in question 17.

16. How can we ensure that passenger subsidies do not inflate the cost of point to point transport services?

NCOSS is concerned that without the implementation of complementary measures. The application of passenger subsidies in a deregulated market could result in inflated costs for point to point services and the erosion of the benefit of the subsidy for people with disability. In this context NCOSS recommends that no application of provider neutrality be undertaken without consideration of a range of measures to monitor the prices paid, and protect people with disability. This should include:

- Comprehensive collection and monitoring of data on TTSS customers usage of the system, journeys undertaken, prices paid per hour/kilometre, as well as comprehensive service feedback from users.
- Consideration of maximum regulated prices for the provision of services to TTSS customers.
- Consideration of fixed methods for estimated price calculation and display, for people with disability, to assist with the transparency and predictability of pricing.
- As detailed above, the implementation of driver performance monitoring for wheelchair accessible service providers, linked to incentives and sanctions.
- Centralised booking service that prioritises the cheapest available option as default, with more expensive option being presented as a 'choice'.

17. What assistance or protections do people with disability need in relation to pricing?

NCOSS has a number of concerns about the deregulation of pricing in booked-services. It is crucial that pricing methods are able to be clearly understood by people with disability, and that they are protected from unreasonable price differentials that might undermine their ability to choose the service that suits them, or erode the value of the subsidies paid to help ensure their access to appropriate point to point transport services.

While NCOSS is supportive in principle of expanding the application of subsidies and incentives to all point to point transport providers, this should only be done if it can be demonstrated to:

- Effectively lead to an actual increase in the point to point transport options available to people with disability.
- Maintain a fair and clearly understandable and comparable pricing structure across all providers who utilise the subsidy and incentives.
- Ensure that the value of the subsidy payments available to people with disability are not effectively eroded or devalued in such a way that reduces the choice and control that people with disability have over their access to point to point services.

In this context, NCOSS believes that consideration should be giving to retaining regulated maximum fares for Wheelchair Accessible Taxis, and other point to point transport service providers collecting subsidy payments. To address concerns with deregulated pricing, NCOSS further recommends consideration be given to:

- Adoption of standardised pricing calculation and information provision for all Wheelchair Accessible Taxi providers, and others who collect Taxi Transport Subsidy Payments.
- Quarantining Wheelchair Accessible Taxis from surge pricing mechanisms, or similar differential pricing mechanisms where the price rises according to demand and supply imbalance.
- Ensuring that the centralised booking service selects the cheapest available option for booked service for people with disability as the 'default', while presenting any surge-priced, or more expensive 'sooner' option as a clear choice.

18. What implications would service provider neutrality have on the viability of wheelchair accessible vehicles?

The independent assessment should provide information as to the viability of WAT services, and the potential impacts of provider neutrality. However, while NCOSS is supportive of measures that could increase the number of WAT service providers, it is critical that changes such as provider neutrality are undertaken in such a way to ensure that WAT services are viable and sustainable in the long term. In this context, we believe it is important to have overall consideration for the availability of WAT vehicles, rather than the number of potential providers. For example, in many rural and regional areas measures that encourage greater usage of existing WAT vehicles and services may be more effective than increasing the notional number of providers. We have addressed this in some detail in questions 8 and 22.

19. How can incentives be used to increase the supply of wheelchair accessible vehicles, particularly in areas with unmet demand?

NCOSS supports the investigation of improved measures to address the continuing unmet need for wheelchair accessible vehicles in many rural and regional areas. We know that many people with disability in rural and regional communities are particularly isolated and disadvantaged by a lack of access to transport, having to rely on WAT services that are often unavailable or insufficient to meet demand. NCOSS recommend:

- Differential driver subsidies that allow higher subsidy payments for WAT drivers providing services in designated rural and regional, and outer suburban areas.

- Introduction of an additional incentive payment or 'rebate' payment to WAT drivers who meet a minimum standard percentage of completed WAT jobs in a month, in designated or identified areas of unmet need.

20. How and when should subsidies be applied to ensure that wheelchair accessible services remain viable?

NCOSS will await the release of the results of the independent assessment of the financial viability of WAT services before providing input on potential changes to the timing and method of the application of subsidies.

21. Should all wheelchair accessible point to point vehicles be required to prioritise wheelchair jobs? How should this requirement be measured and enforced?

People with disability, particularly those who use a wheelchair, are often heavily, if not wholly, reliant upon point to point for independent transport. NCOSS believes that facilitating timely access to point to point services is fundamental to enabling choice and independent control for people with disability, and that point to point providers should be required to prioritise wheelchair jobs to help underpin this choice. While monitoring and enforcing a requirement such as this is difficult under the current scheme, NCOSS believes that transition to an appropriately implemented smart-card based system should allow more effective monitoring and enforcement. In this context NCOSS believes that consideration should be given to:

- Systemic collection of key performance data linking the centralised booking service and drivers of wheelchair accessible point to point services. This data should include:
 - Gross number of requests for a wheelchair accessible vehicle booking, broken down by local government area.
 - Waiting times between booking and job acceptance/pickup, broken down by local government area.
 - Percentage of jobs accepted/completed by each wheelchair accessible vehicle driver within a weekly/monthly/quarterly period.
 - De-identified data on job-requests per user, broken down by time and local government area.
 - User ratings/ feedback on driver.
- Setting a minimum weekly/monthly/quarterly acceptance/pickup/completion percentage for each driver of a wheelchair accessible point to point vehicle. Maintenance of this minimum pickup rate should be required for continued access to the full benefit of driver and operator incentives (including WAT payments, discounted licences, etc).
- Setting incentive targets for acceptance/pickup/completion percentages for drivers of wheelchair accessible vehicles, achievement of which entitle drivers to additional incentive payments above the minimum. This could also be paid as a 'bonus' sum, or a rebate payment on licence, registration or other administrative fees.
- Implementation and publication of user ratings of drivers, and key performance statistics, such as job completion rates.
- Implementation of sanctions or penalties for drivers and operators who fail to meet minimum acceptance/completion percentages, or who are consistently rated poorly by users.

22. How should subsidies and incentives be applied to encourage maximum utilisation of vehicles for wheelchair jobs?

As outlined above, NCOSS believes that enhancing the system of subsidies, sanctions and incentives in conjunction with better data collection and monitoring is key to encouraging availability of wheelchair accessible vehicles. In addition to the incentive measures already outlined, NCOSS believes that consideration should be given to:

- Collection of data on the number of hours of active availability of each wheelchair accessible vehicle, via individual identification by unique vehicle number. This vehicle data should be separate to information on driver performance.
- Incentive payments to operators/owners of wheelchair accessible vehicles, according to the number of hours that their vehicle is actively available. With a benchmark minimum being set, and incentives paid for target hours above this minimum. For example, payment of an additional weekly/monthly/quarterly incentive amount for operators whose vehicle is actively in service and available more than 70% of the time.

Such measures would provide a mechanism that incentivises operators/owners of wheelchair accessible vehicles to make their vehicle available to other drivers or operators, and reduce the potential hours that a vehicle lays idle, on increase to overall utilisation of vehicles.

23. How should we manage the potential competitive advantage of service providers who receive other government funding?

NCOSS strongly disagrees with any suggestion that a service provider receiving government funding is at a competitive advantage in the delivery of wheelchair accessible point to point services. It is crucial to recognise that the subsidy and incentive schemes supporting the delivery of appropriate services to people with disability, are mechanisms implemented to overcome the fundamental failure of the market to provide services that meet the needs of people with disability.

It is important to recognise that any other government funding that may be provided to service providers (such as community transport service providers) is provided in fulfillment of a range of specific purposes, such as overcoming the fundamental transport disadvantage of vulnerable cohorts in rural and regional areas, where alternatives are not available. It is also crucial to recognise that any government funding that service providers receive, comes with significant administrative requirements and with an obligation to provide a higher level of care and responsibility for vulnerable clients, than is applicable for (or undertaken by) any other point to point service providers.

Less mobile older people, people with disability, people with chronic illnesses, and people experiencing transport disadvantage in rural and remote areas, have fewer options available to them, with community transport and point to point transport often the only viable (if limited) options available. NCOSS would be very concerned to see any notions of a need for a 'level' playing field operate in any way to undermine or reduce the current level of service provided to vulnerable transport users, or the effective options available to them.

24. How can the centralised booking service be used to drive improvements in wheelchair accessible services?

NCOSS supports the retention of a centralised booking service, and believes that there are significant opportunities to expand the data that it collects, and its practical functionality, enabling improvements to the delivery of wheelchair accessible point to point services. In addition to the measures already outlined in response to other questions, NCOSS recommends consideration of:

- Improvements that allow de-identified, basic passenger details to be retained by the system (by user number rather than name), including:
 - Basic wheelchair type and any specific requirements.
 - The details of top 5 favourite journeys that can be selected automatically.
- More effective communication between drivers and booking service operators, and the better provision of information on job acceptance, arrival times and delays to passengers.
- Extension of the operation of the central booking service to all areas across the state.

25. Should the centralised booking service give customers the option of integrated booking and payment?

Giving users of the centralised booking service an option to integrate booking and payment could be useful for some users in certain circumstances, and for some services who make bookings on behalf of people with disability they support. However, such integrated booking and payment should be optional rather than the default. Maximising the choice and independent control of people with disability should be the prime consideration in the designing the functions of the booking and payment systems.

26. Should the centralised booking service be ‘provider neutral’? Should it book the nearest suitable vehicle regardless of the service provider?

While NCOSS is supportive of the broad principle of provider neutrality, there are potential implications which raise a number of serious concerns. We strongly recommend that any move to implement provider neutrality through the operation of the central booking services is done in conjunction with the implementation of a range of measures to protect people with disability, ensure the value of their subsidy, and maintain their choice and control in accessing the point to point transport services they need. These measures should include:

- That all providers providing services through the centralised booking service meet or exceed the minimum standards for vehicle accessibility, safety and operability.
- That all drivers providing services through the centralised booking services meet or exceed an improved minimum standard of driver training in the provision of services to people with disability. This training must go beyond the operation of wheelchair related machinery, and specifically include training in the provision of safe and appropriate services for people with disability, and avoiding inappropriate or offensive behaviour. NCOSS recommend that TLIC2040² elements 2 and 6 (relating to effective communication and the application of ethical behaviour) be added to elements 3 and 4 as required minimum standards for all drivers providing WAT services.
- NCOSS prefers that all drivers providing services booked by the centralised service, be subject to regulated maximum prices to protect people with disability, and ensure that the value of their subsidy payments is not eroded. However, at a minimum, the centralised booking service should default to the cheapest option available (regardless of timing), with any more expensive option (that may be available sooner) provided as an option or choice.

² <https://training.gov.au/Training/Details/TLIC2040>

- That providers that 'surge' price should not be able to provide services through the centralised booking service, or should automatically be put at the 'bottom of the queue', to be offered as a more expensive choice should a person with disability be prepared to pay more than the 'default' offer, for a sooner pick-up. People with disability should not be burdened with a higher cost service as a first or only choice.

27. Do non-wheelchair users with specific accessibility needs require access to a centralised or subsidised booking service?

While people with disability who require a wheelchair have particular needs that are better accounted for through the availability of a centralised subsidised booking service, many other people with disability also benefit from access these services. People with assistance animals, vision impairment and people with an intellectual disability benefit from a service that gives them simple, dedicated access to booking of point to point transport.

28. What aspects of driver behaviour need to be compensated or incentivised and which aspects are customer services matters for service providers?

NCOSS supports the recently release regulations and their focus upon safety and security and believe that these considerations are particularly important in relation to the provision of point to point services for people with disability. However, NCOSS does not agree that the maintenance of appropriate standards of safe, and secure service provision should be regarded as a 'customer service' matter to be monitored by service providers. In this context NCOSS supports the application of strong minimum standards of driver training. As previously stated, we believe this must include elements of training related to appropriate communication and safe and ethical behavior. NCOSS recommends that driver training standards should be required and incentivized as detailed in response to question 26. **How can we ensure that paying incentives for some jobs does not create a disincentive for other jobs, such as:**

NCOSS believe that better driver training in the appropriate provision of services to people with disability for all point to point drivers (particularly those providing wheelchair accessible services), in conjunction with better monitoring of driver behaviour and performance (particularly performance data related to the number/percentage of wheelchair jobs completed), is the foundation of building better responsiveness to all jobs for people with disability, regardless of whether or not they are subsidised users. In conjunction with these measures, more comprehensive and systemic monitoring of data key data, such as job waiting times, jobs not accepted, and driver refusals, will be important for determining whether incentives are having perverse service outcomes.

29. Is there a more effective way to incentivise responsiveness to wheelchair jobs?

NCOSS supports the retention, and possibly expansion of incentives to improve the responsiveness of WAT drivers to wheelchair jobs. However, as we have indicated in previous questions, we believe that a more holistic approach, including driver training, improved data collection and monitoring, and performance linked incentives, is required.

30. How can we move away from a paper based transport subsidy scheme, while still ensuring that everyone has the ability to access the scheme?

NCOSS is supportive of the introduction of a smart-card based system for users of the Taxi Transport Subsidy Scheme. Such a system could provide greater ease of use for many people with disability, while also providing greater opportunities for the collection of comprehensive data on scheme usage. A smart-card based system could also be an opportunity to expand access to the scheme and the mobility it facilitates, and help to address many of the issues that are currently faced by many people with disability using the current voucher based system. There are a number of factors which must be taken into account to ensure that the transition away from a paper based system ensures maximum functionality, and does not result in inconvenience or disadvantage for particular groups. These considerations include:

- That the system is based upon a simple, personally identified smartcard, rather than any particular form of technology (such as a smart phone or credit card) which would be likely to disadvantage or exclude many people with disability.
- That the application process for the card be simple, accessible, and able to be undertaken without unreasonable administrative burden. It must be noted that many users of the scheme may live in outer urban or regional areas, and may have long distances to travel to access government service centres. An application process that had options for completion online, in person or via post, would be more appropriate than one which prescribed any particular process.
- Any card payment system should not be required to be linked to a credit card, bank account or direct debit arrangement. Many people with disability have fixed and limited incomes, and have particular security concerns.
- That any smart card payment system is completely separate from the user's own funds, and that payment of the users portion of the fare can be undertaken separately to payment of the subsidised portion of the fare (ie: that the subsidy portion of the fare is paid via smartcard, with the users portion paid separately via cash or card). Functionality such as this would allow retention of the option of payment via voucher as an option for some users. Keeping user payment separate from subsidy payment not only addresses security concerns, but also helps to ensure that the system does not require user 'top ups' or other procedures which decrease the accessibility of the system to many people with disability.
- That the paper-based system is retained, at least through a substantial transition period (at least 2 years) as an option for users.
- That simple (de-identified) booking and trip data is linked to the smart card system to maximise the utility of the system and the ability to collect data on the use of the scheme, to inform future review and reform of the schemes which will maximise their effectiveness in enabling transport options for people with disability. Important data could include:
 - Time between booking and 'pick-up'
 - Time of use
 - Trip length data
 - Trip fare data
 - Locational data
 - Driver 'number' data (ie linking WAT drivers to WAT job data) to facilitate potential payment of differential driver incentives and 'penalties'.

31. How can we design a scheme that supports ongoing technological innovation without disadvantaging users without access to digital technology?

Please refer to the previous question.

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

Previous research indicates that many people with disability either currently use, or would like to be able to use, point to point transport to link more effectively to public transport modes, particularly trains. NCOSS is supportive of measures that could improve the independence of people with disability by improving accessibility and functionality of all transport. NCOSS would support detailed consideration of measures that facilitate and incentivize a combination of public transport, community transport and other point to point transport.

Conclusion

We thank TfNSW for the opportunity to provide input on the Transport Disability Incentive and Subsidies Review process. We look forward to continuing to work with TfNSW towards a point to point transport system that helps to enable affordable choice and control for people with disability, and facilitates better access to transport for the community. NCOSS looks forward to the next stage of the review process.