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**Vision Australia
Submission to the Economy and
Infrastructure Committee Inquiry into the
regulation of ride sourcing services**

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Introduction

Vision Australia welcomes the opportunity to provide input to the development of ridesharing regulations in Victoria.

We have worked with the relevant authorities in NSW and QLD during the development of ridesharing regulations in order to protect the rights of people who are blind or have low vision and in this submission we provide our recommendations towards ridesharing regulations in Victoria.

People who are blind or have low vision do not drive and are more reliant on transport options such as taxis and ridesharing. Personalised transport services represent the closest equivalent to independent car travel for the blindness and low vision community and are a crucial link to maintaining employment, gaining an education, and participating in recreational, sporting and other community activities.

Ridesharing guidelines must protect the rights and interests of people who are blind or have low vision through fare subsidies, accessible booking options and driver awareness training which should include the access rights of passengers with their Seeing Eye Dogs.

We have addressed the terms of reference relevant to our community below.

Terms of reference

Consumer protection

The rights of consumers must be protected by an adequate system for ridesharing services complaints. The need for ridesharing vehicle identification (explained further under reference point 3) for people who are blind or have low vision is also relevant when developing a consumer complaint system. Car and driver information must be accessible to our community to equip passengers with the information they need to make a customer complaint.

Customer safety

Vision Australia recommends that regulations include a driver screening assessment process which must be updated every few years and which requires potential drivers to:

1. Hold full Australian driver's license and have done so for at least six months
2. Have a working with children check
3. Have a national criminal history check.
4. Pass fitness, medical and eyesight medical assessment

5. Have Australian citizenship, Australian residency or a valid working visa.
6. Completed driver awareness training
7. Have knowledge of Melbourne geography training
8. Speak English well

We support the opportunity to rate every driver at the end of each journey, which has been introduced by ridesharing service providers like Uber.

Vehicle Identification

A braille and tactile print sign on the outside and inside of the vehicle door should display the number and registration of the vehicle, to make identification more accessible.

A passenger who is blind or has low vision needs to be confident that the vehicle they enter is a ridesharing vehicle and be able to identify the vehicle in case of emergency or the need to make a complaint. Adequate signage, braille and tactile identification, and driver awareness in verbally identifying the transport service can all assist in this identification.

Knowledge of route

We recommend that existing and new ridesharing operators should be required to enable speech output on their GPS if requested by the passenger. Speech output, if requested, can provide a sense of security for passengers who cannot see where they are going and for assessing whether the fare is reasonable.

Below is a quote from one of our clients who commented on her safety concerns around point to point transport:

“Sometimes women feel cautious about being driven by men they don’t know, like taxi drivers or Uber drivers. Not only am I a woman but I had low vision which I think increases my vulnerability. I try to hide my vision loss from drivers so that I don’t reveal a weakness. I often feel lost when I’m being driven in a taxi as I have trouble recognising the streets we are driving on. There have been a number of occasions where I have started to feel unsafe as I wonder if I’m being driven somewhere I don’t want to go. If drivers had GPS with speech capabilities and I was able to request the speech be turned on, I would feel less anxious and out of control when being driven.”

Competition

We believe that for ridesharing services to be truly competitive the Multi-Purpose Taxi Program (MPTP) subsidy must be expanded to cover all forms of ridesharing. It

is vital that ridesharing is an affordable transport option for people with a disability so they are able to function on an equal basis as the rest of the community.

The Multi-Purpose Taxi Program (MPTP) assists with the travel needs of people with severe and permanent disabilities by offering subsidised taxi fares to those deemed eligible.

MPTP membership is for life and it subsidises 50% of standard taxi fares, paying up to \$60 per trip.

Taxis are a non-optional cost of blindness. Many people who are blind use the MPTP subsidy in order to assist with the cost of travel to employment, health care and community or social activities. Figures show that many people who are blind have low incomes, which reduces transport options. Based on Productivity Commission and Vision Australia data, we estimate that at least 80% of our clients are supported fully or partially through social welfare payments (e.g. Disability Support Pension and aged care pensions). Further; four out of five people who are blind or have low vision rely heavily on subsidised services.

Below, one of our clients speaks in support of fare subsidy extension to ridesharing services:

“I have low vision and am a sole parent of two children and so I use taxis all the time. Taxi travel is something I can only afford to do because of my MPTP subsidy. When people see me call or wait for a taxi they sometimes question why I choose taxis instead of Uber. They tell me that Uber is a much better service and that I shouldn't bother with taxis. When I explain that my subsidy (MPTP) only works in taxis the response is: there should be the subsidy for Uber too as Uber is a lot better. In fact when traveling with friends they often insist on calling an Uber and using their own Uber account to pay instead of calling a taxi where we can use my MPTP and receive the 50% discount. It's interesting to note that my discount isn't enough of an incentive to travel in a taxi for many of my friends.”

It is important to note that although the NDIS individual funding packages (IFP), or plans, do include transport allowances – which are subject to work, study, social activities, and day program attendance, and “taking into account relevant taxi subsidy schemes” – it will never fully replace or absorb the MPTP system. This is because the NDIS does not include people aged over 65 and the MPTP has varying eligibility criteria that differs from NDIS individualised plans.

Access for people with disabilities

Driver Awareness

We recommend that all drivers be required to demonstrate appropriate understanding of the assistance that they must reasonably provide to people who are blind or have low vision, as part of their safety accreditation.

Driver awareness training for those in the ride-sharing industry is essential for the safety of the blindness and low vision community. People who are blind or have low vision often require door-to-door assistance in order to safely reach and enter the vehicle, and in turn, safely arrive at their destination. Passengers must not be made to feel like a burden or a 'parcel' if they are being assisted by a driver.

Seeing Eye Dogs

Driver awareness needs to extend to the legislation around Seeing Eye dog access to public transport. On occasions, when people are refused access to transport on the basis of their Seeing Eye dog, it is not only unlawful under the *Guide, Hearing and Assistance Dogs Act 2009 (Qld)* and anti-discrimination laws, it can present safety concerns when people are left roadside or in isolated locations.

Language and Geographic Knowledge

People who are blind or have low vision are heavily reliant on verbal interactions with drivers, as well as the driver's knowledge of geographic locations and destinations. They often face barriers when drivers who are not able to find the passenger's destination and the passenger is left at an incorrect, often unfamiliar, location.

Equality of service rights

Reform must also ensure that regulated personalised transport providers are treated equally at airports and other places where taxis are currently treated more favourably. For instance, taxis are permitted to stop in loading zones to drop off passengers, but other providers are not.

For our clients, there are significant safety implications if a driver is not able to assist them from the vehicle to their destination, particularly in busy, high-traffic areas such as airports and city centres. Current zoning regulations are not working well for our clients. We are highly concerned that urban planning has failed to consider the needs of people who are blind or have low vision and who rely on public transport. Ridesharing regulation must ensure that all personalised transport is equally and safely usable by members of the blindness or low vision community.

How impacts of such regulation on the taxi industry can be minimised;

We believe that ridesharing regulation must not negatively impact taxis. Taxi services must remain a viable transport option. It is very important to maintain access to transport services. For example, in thin markets, like remote regional areas, there may be limited incentive for ridesharing services like Uber to operate. This poses the risk of isolation for people who are blind or have low vision: any changes to current arrangements should ensure they can rely on access to a good taxi service.

Any other issues the Committee regards as relevant.*Accessible information – booking apps and online information*

For those members of the blindness and low vision community that do have access to internet and smartphone technology, it is imperative for booking apps and online information to be presented in an accessible format. People who are blind or have low vision often use a voiceover function on a smartphone in order to listen to the information appearing on the screen – apps compatible with the voiceover screen-reading software enable them to have equal access to information and services. People who are blind or have low vision often access online information through the use of screen reading software – online information presented in accessible formats is similarly important to full participation.

Uber uses modern technology and has made its app accessible to people who use the Voiceover screen reader. So a person who is blind or has low vision is able to tell what the total fare for an Uber journey has been. Because Uber processes credit card payments automatically, there is no need for the passenger to give their credit card to the driver, and there is no possibility for the driver to make an error when entering the amount to be charged to the card. Uber also emails receipts, and these can be read by screen-reading software. So a person who is blind or has low vision has access to the same financial information as a sighted passenger when using Uber.

However, developments in ridesharing that rely solely on, or make use of, Smartphone technology such as booking apps, will not lead to benefits for the majority of people who are blind or have low vision. For many, traditional booking methods will remain essential for the foreseeable future.

- Research commissioned in 2012 by the Australian Communications and Media Authority (ACMA) found that among the general population, in the 65 and older age cohort there was only a 15% usage of smartphones. 70% of Vision Australia's 27,500 clients are aged over 65.

- Vision Australia has found through our own research that up to two-thirds of our clients do not have access to the internet, and a recent survey revealed that just 16.7% of our clients use a Smartphone. When further broken down according to age cohort, only 6% aged over 65 used a smart phone, compared to 52% of people aged 19 – 65.

The implication of this is that developments in personalised transport that rely solely on, or make use of smartphone technology such as booking apps, will not lead to benefits for the majority of people who are blind or have low vision, for which traditional taxis booked by traditional methods will remain essential for the foreseeable future. Technological developments are providing new opportunities for innovation for the ridesharing services industry, but these opportunities must be balanced against the need for continuity and sustainability. The “digital gap” that currently exists between those who can take advantage of new and emerging technologies, and those who cannot, will be widened unless an effective regulatory framework is put in place that creates a level playing field both within the ridesharing industry and for those who use it.

We believe that an alternative booking method should be required for consumers who don't have access to smartphone technology.

Accessible payment terminals

Another area of technological development is in the use of touch-screen tablet devices, with gesture based input, for the purpose of processing financial transactions. The Commonwealth Bank's Albert Payment terminals are one such example. There is a growing trend towards the use of touchscreen-based payment terminals that are completely inaccessible for the majority of people who are blind or have low vision.

Regardless of attempts to familiarise people who are blind or have low vision with tablet gesture based devices, it must be emphasised that this is neither the preferred, nor the most suitable payment option for the majority of our community. The need for assistance to process transactions and verify accuracy denies passengers both their independence and the secrecy of their account details. It is subsequently imperative that accessible payment terminals (e.g. eftpos terminals with braille orientation on the pin-pad) remain available within the ridesharing industry.

Vision Australia is highly concerned that taxis will become completely cashless over time, which will increase the importance of supplying accessible payment options. Self-regulation has so far failed to deliver accessible touchscreen-based terminals in

taxi, and so there needs to be regulatory requirements around payment accessibility.

About Vision Australia

Vision Australia is the largest provider of services to people who are blind, deafblind, or have low vision in Australia. It was formed through the merger of several of Australia's most respected and experienced blindness and low vision agencies.

Our vision is that people who are blind, deafblind, or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision, are deafblind or have a print disability, and their families. The service delivery areas include:

- early childhood
- orientation and mobility
- employment
- accessible information (including library services)
- recreation
- independent living
- Seeing Eye Dogs
- Registered service provider for the NDIS and the My Aged Care portal
- advocacy, and working collaboratively with Government, business and the community to eliminate the barriers our clients face in making life choices and fully exercising rights as Australian citizens.

Vision Australia has gained unrivalled knowledge and experience through constant interaction with our 27,500 clients and their families, and also through the involvement of people who are blind or have low vision at all levels of the Organisation. Vision Australia is therefore well placed to provide advice to governments, business and the community on the challenges faced by people who are blind or have low vision fully participating in community life.

We have a vibrant client consultative framework, with people who are blind or have low vision representing the voice and needs of clients of the Organisation to the Board and Management.

Vision Australia is also a significant employer of people who are blind or have low vision, with 14.5% of total staff having vision impairment.

Vision Australia also has a formal liaison arrangement with Blind Citizens Australia (BCA) through a Memorandum of Understanding for a number of purposes, including collaboration, so that Vision Australia's systemic advocacy and public policy positions are, wherever practicable, consistent with the programs and policies of Australia's peak body representing people who are blind or have low vision.