

**Summary of feedback from consultation on
draft *Queensland Taxi Strategic Plan 2010-2015***

Summary of feedback from key stakeholders on draft *Queensland Taxi Strategic Plan 2010-2015*

Following is a summary of the feedback received as part of the consultation process for the draft *Queensland Taxi Strategic Plan 2010-2015* (the draft plan). The consultation period commenced when the draft plan was released by the Minister for Transport on 27 May 2010, and was extended to Monday 2 August 2010 so that respondents could take into account the Report on Investigation into the Taxi Industry in Queensland by the Queensland Workplace Rights Ombudsman (the Ombudsman)

Overall, 30 responses were received (eight arrived in the week immediately following the deadline for submissions and were consequently considered). Responses ranged from comprehensive, detailed documents to letters and single issue emails, and reflected the views and opinions of industry stakeholders including drivers, operators, taxi booking companies and the public.

Of the 30 responses received:

- Five were received from taxi booking companies (TBCs);
- Four were received from larger taxi management companies (TMCs);
- Nine were received from smaller scale owners and operators who also had current or previous experience as taxi drivers;
- Three were received from current taxi drivers;
- Three were received from former taxi drivers (who may have had a continuing role in the industry but did not make this clear);
- Four were received from representative or lobby groups;
- One was received from a passenger; and
- One was received from an academic associated with Griffith University.

Geographically:

- 11 were from Greater Brisbane (incorporating areas covered by the Brisbane, Logan, Ipswich, Redlands and Moreton Bay local government areas);
- Three were from the Gold Coast;
- Three were from the Sunshine Coast;
- Three were from Townsville;
- Two were from Cairns;
- One was from Mackay; and
- It was impossible to determine the geographic origin of the remaining seven due to content and e-mail lodgement.

In general, the responses were of a relatively common point of view on a substantial proportion of the actions in the draft plan. Where identifiable differences based on groupings occurred, these are identified.

A key result of the consultation process was comprehension on the part of the Department of Transport and Main Roads (TMR) of the need to develop and implement an ongoing stakeholder engagement process to ensure continued understanding of the strategic plan and the implementation processes at all levels of the taxi industry.

PRINCIPLE – SAFE – Taxis services will be safe

Outcome People will feel safe using taxis

Strategy 1 Improve and enforce driver competency standards and enhance passenger perceptions of safety.

Action 1.1 *Introduce a requirement for all applicants of taxi driver authorisation to meet the National Minimum English Standard from November 2010.*

Synopsis of Feedback

The majority of feedback from TBCs, TMCs, owners, operators and drivers for this action was positive:

- There was general agreement with the need for a minimum English standard.
- Some stakeholders expressed concern regarding additional costs for potential drivers associated with English testing.
- Some concern expressed about the standard for English for potential drivers being set too high.
- Concern of impact on availability of potential drivers.
- Some respondents claimed that TMR's 2009 Mystery Shopper exercise provided no evidence of English language skills of drivers being problematic.

Government Position

- The Government supports the adoption of the National Minimum English Standard (NMES) for taxi driver English language assessment as agreed by the Australian Transport Council (ATC).
- As the local and international economy improves, the driver availability issue raised by some stakeholders is becoming increasingly valid.
- In relation to the Mystery Shopper exercise, while the process was valid it does not stand alone as a measure of community perception. Further exercises to map longitudinal data are scheduled as part of the strategic plan.
- From November 2010, all new applicants for taxi driver authorisation will need to demonstrate that they meet the NMES. The assessment will be undertaken through a live on-line methodology delivered by Central Queensland Institute of TAFE for a cost of \$90.00 per assessment. Candidates will be required to attend approved centres to undertake the assessment. To ease the burden of travel and to assist taxi booking companies (TBCs) in their case management approach to new taxi driver applicants, TBCs will be approved as testing locations if they meet the criteria set down by Central Queensland Institute of TAFE. TMR will conduct random audits of TBC assessment locations to ensure testing is being legitimately undertaken.

Alignment with Ombudsman's Report

- The national approach to taxi driver training was applauded by the Ombudsman.
- Problems with language and communications skills in the taxi industry were recognised in the Ombudsman's Report recommendations 2 and 4.

Action 1.2 *Introduce a requirement for all applicants for taxi driver authorisation in contracted and metered areas to undertake training through a Registered Training Organisation and demonstrate competency in the national core taxi driver training competencies from January 2011.*

Synopsis of Feedback

Broadly stated, TBCs and TMCs were cautious about this action. Generally, smaller scale owners and operators and drivers were more enthusiastic:

- There were some expressions in favour of national consistency.
- Some expressed hope that this action may improve road safety for drivers.
- Some expressed concern regarding additional costs associated with training delivered by Registered Training Organisations (RTO).
- Some expressed a desire to keep training “in-house” to address local conditions.
- Some respondents claimed that the TMR’s 2009 Mystery Shopper exercise provided no evidence of taxi driver training and skills being problematic.

Government Position

- The Government supports the introduction of the national taxi driver training core competencies delivered through RTO endorsed by the ATC and approved by the National Quality Council.
- As the local and international economy improves, the driver availability issue raised by some stakeholders is becoming increasingly valid.
- In relation to the Mystery Shopper exercise, while the process was valid it does not stand alone as a measure of community perception. Further exercises to map longitudinal data are scheduled as part of the strategic plan.
- TMR is progressing the implementation of the national taxi driver training framework agreed by the ATC in April 2010. While other jurisdictions are implementing the framework only in their capital cities, in Queensland from January 2011, all new taxi driver authorisation applicants who intend to drive in contracted areas that have 35 or more taxi service licences will be required to satisfactorily complete RTO delivered training in the national taxi driver training core competencies. Restricting the requirement to these areas strikes a balance between safety and service improvements for the public and commercial viability for operators and drivers.

Alignment with Ombudsman’s Report.

- The national approach to taxi driver training was applauded by the Ombudsman who made nine recommendations on training based on the current system of training and accreditation. (Recommendations 1 to 9).

Action 1.3 *Introduce a requirement for ongoing professional development of taxi drivers following the introduction of new requirements for applicants of taxi driver authorisation.*

Synopsis of Feedback

In general, a broad cross-section of respondents supported this action:

- Concern regarding additional costs.

- Acknowledgement of the constancy of technological change, new urban growth, and other developments that requires longer term drivers to remain up-to-date with changes.

Government Position

- The Government is committed to introducing a requirement for ongoing professional development for taxi drivers to maintain service and safety standards.
- This work needs to complement the RTO delivered competency based training for new taxi drivers. TMR will work with the taxi industry on future training once these new requirements are in place.

Alignment with Ombudsman's Report

- No specific recommendations were made in the Ombudsman's Report regarding ongoing professional development or refresher training for taxi drivers.

Action 1.4 *Introduce a requirement for taxi drivers to display photographic identification and taxi industry contact details in taxis.*

Synopsis of Feedback

TBCs and TMCs were not opposed to this action, however others in the industry expressed operational concerns:

- Consistency with other jurisdictions recognised.
- Concern regarding additional costs to be borne by drivers.
- Concern over potential theft of card by unruly passengers.
- Concern over card holder potentially becoming a weapon.
- Concern over what information would be on the card.
- Concern about over-zealous compliance if card stolen.

Government Position

- The display of a taxi driver's photographic identification will give passengers confidence that the taxi driver has met all of the requirements and is authorised to drive the taxi.
- Most other jurisdictions require driver identification to be displayed in taxis.
- The current implementation proposal is a staged rollout following the introduction of the New Queensland Driver Licence (NQDL) area by area. This will minimise costs to taxi drivers and maintain consistency of use of the secure bio-metric photograph of the driver. Required legislative change will be introduced in 2010.

Alignment with Ombudsman's Report

- This action is supported by the Ombudsman in his comments leading up to recommendations 38 to 40.

Action 1.5 *Enhance fatigue management requirements for all taxi drivers.*

Synopsis of Feedback

There was considerable support across respondents for this action:

- TBCs and TMCs strongly supported this action, however, the point was made that TBCs and TMCs had no control over what a driver had been doing prior to starting a shift.
- A small minority of respondents claimed that drivers were the best judges of the effects of fatigue on their own driving.

Government Position

- The Government is keen to enhance the current requirements on TBCs, operators and drivers for fatigue management.
- Research into the issue of taxi driver fatigue is required to establish a policy position.
- TMR has commissioned research into taxi driver fatigue. Following this research, TMR will work with taxi industry stakeholders to develop practical, evidence-based fatigue management policies and practices.

Alignment with Ombudsman's Report

- This aligns with recommendation 56 in the Ombudsman's Report.

Strategy 2 Improve driver safety

Action 2.1 *Ensure that technological safeguards (e.g., taxi security cameras) are in place and working*

Synopsis of Feedback

There was considerable support across respondents for this action:

- Concern regarding reliability and operation of the current taxi security camera product.
- Opposition to the Ombudsman's Recommendation 48 because of:
 - late night passengers who may not be carrying identification; and
 - the potential conflict this request of passengers by drivers would cause..

Government Position

- It is critical that safety equipment installed in vehicles such as taxi security cameras are in working order and that drivers, operators and taxi booking companies are clear about their roles and responsibilities in this regard.
- Some existing taxi security cameras have been in place for some time, so there is a need to ensure that they are in working order so that drivers and passengers are protected.
- The Government does not support the requirement for passengers to produce and have recorded their identification on the taxi security camera.
- TMR is currently examining the future direction of taxi security cameras with regard to effective legislation, policies and procedures, specifications and supply. This activity includes actively seeking industry feedback on existing arrangements and future proposals.

Alignment with Ombudsman's Report

- This aligns with recommendations 48 and 56 in the Ombudsman's Report.

Action 2.2 *Review driver distress system and procedures*

Synopsis of Feedback

There was considerable support across respondents for this action:

- In general, the response received on this issue is that driver distress systems and procedures were working well, but that there would be no harm done by reviewing them.

Government Position

- The review of the driver duress systems and procedures is intended to ensure that the operational parameters around activating and responding to the duress systems are in place and effective.
- Technological developments in both in-car distress/duress systems and vehicle design also need to be monitored to accommodate the highest practical driver safety standards in the taxi system.
- TMR will work closely with taxi industry stakeholders to ensure that duress systems in taxis provide an acceptable level of protection for drivers.

Alignment with Ombudsman's Report

- The Ombudsman did not specifically address driver distress systems and procedures in his report.

Action 2.3 *Improve relationships between the Queensland Police Service (QPS) and industry to ensure that ongoing active engagement results in effective response times to issues*

Synopsis of Feedback

This action received broad support across respondents:

- Most TBCs report good relationship with QPS, but would be happy to work more closely.
- Some comment about slow QPS response times to taxi complaints.
- Two specific suggestions for Taxi Liaison Officers in QPS.

Government Position

- QPS will appoint Regional Police Taxi Industry Liaison Officers throughout the state.
- The priority afforded to crimes by the QPS is determined by a range of factors which include the seriousness of the offence and demands for service at the particular time. Whilst the occupation of the victim is not taken into consideration when assessing the degree of priority, it is acknowledged that police response to offences against taxi drivers may be improved through a closer relationship between the QPS and the taxi industry.
- QPS will implement this action as soon as possible and will work in close partnership with the Queensland taxi industry to further enhance the safe operation of the Queensland taxi fleet and its drivers.

Alignment with Ombudsman's Report

- This action aligns with recommendations 52 and 53 of the Ombudsman's Report.

Strategy 3 Improve safety of secure ranks

Action 3.1 *Investigate improved safety options for secure ranks, including where additional ranks might best be sited*

Synopsis of Feedback

There was considerable support across respondents for this action:

- General support for secure ranks.
- Some concern about secure ranks concentrating numbers of intoxicated people in the one area.

Government Position

- The Government will continue to view safety in late night entertainment precincts as a priority. TMR will continue to consult with the taxi industry and local government authorities to identify potential safety and infrastructure improvements at secure taxi ranks. Investigation into the use of personal distress systems, directional signage and improved access to police assistance for rank marshals will also be included.
- TMR will continue to work with local governments and the taxi industry to examine ways to further enhance secure taxi ranks.

Alignment with Ombudsman's Report

- The Ombudsman made no specific recommendations regarding the numbers and/or locations of secure ranks, and no specific recommendations regarding the infrastructure in place at secure ranks.

Action 3.2 *Develop and implement an education campaign for the general public to enhance respect for front-line taxi workers*

Synopsis of Feedback

There was general support across respondents for this action:

- Some recognition of the benefits of such campaigns in other jurisdictions.
- Opposition centred around the effectiveness of any education campaign on intoxicated violent young people.

Government Position

- The Government is committed to improving taxi driver safety. TMR has allocated \$50,000 for a media campaign to be developed and funded on a 50/50 basis with the industry that will have enhancing respect for front-line taxi industry workers as its primary aim.
- TMR will partner with the Taxi Council of Queensland (TCQ) to develop and implement an appropriate campaign.

Alignment with Ombudsman's Report

- The Ombudsman makes no specific reference to marketing and education campaigns of this type.

PRINCIPLE – Reliable – Taxis will be available for everyone: where they want them, when they want them

Outcome People will have reliable, timely and equitable access to taxis on demand

Strategy 4 Implement an improved model for reviewing and varying the number and mix of taxi licences on a periodic basis, including an improved process for issuing new taxi licences.

Action 4.1 *Finalise the new Taxi Service Licence Model by July 2010.*

Synopsis of Feedback

There was considerable conditional support across respondents for this action:

- Ongoing consultation and involvement in implementation, application and long term maintenance of the model sought.

Government Position

- The new model is dynamic and has the capacity to allow for updates of actual dependent variables (number of taxis, bookings per taxi, bookings per capita) and actual and forecast data for independent variables (population, employment, tourism, GSP, fare levels and car ownership).
- The model has been developed, consultation has occurred and staff have been trained in its application. LEK Consulting has reviewed the model and found that it is a fair and reasonable tool for analysing taxi demand and noted that certain assumptions should be revisited periodically.
- TMR will run the new model prior to the end of 2010 and in parallel with the old model in the first instance, as a validation exercise. The assumption values will be reviewed annually and key inputs updated as required.

Alignment with Ombudsman’s Report

- This aligns with recommendations 26 to 36 in the Ombudsman’s Report.

Action 4.2 *Review existing waiting time benchmarks area by area and develop benchmarks for taxi rank waiting times at key ranks.*

Synopsis of Feedback

While there was support for this action, any differences in views were those between respondents in south east Queensland and the remainder of Queensland:

- There was a general willingness for industry involvement in the development and maintenance of these proposed benchmarks.
- Opposition centred around the potential to establish a single benchmark for all key ranks across the state, irrespective of taxi service area, location, time and season.

Government Position

- Service level data is used in taxi licence modelling and assessments of taxi booking company performance. It is appropriate that benchmarks are reviewed periodically to ensure that customer expectations are met.
- This matter will be progressed once a reasonable body of validated longitudinal data can be accessed from TMR’s data warehouse. There is no intention to establish one state-wide benchmark for wait times at all key ranks.

Alignment with Ombudsman's Report

- The Ombudsman makes no specific recommendations regarding waiting time benchmarks.

Action 4.3 *Review the process for issuing new taxi licences to provide greater flexibility and certainty to Government, the taxi industry and the public.*

Synopsis of Feedback

In some instances, TBCs and TMCs expressed caution regarding Government's intent, but in general saw the benefits of some enhanced degree of certainty. Smaller operators, owners and drivers were concerned about income if too many taxis became available.

- The benefits of longer range certainty for industry were recognised.
- In some instances, understanding of the intent of this action seemed mixed. A number of motives were suggested, including Government:
 - resuming or confiscating licences with minimal or no compensation;
 - deliberately flooding the market to reduce licence asset value;
 - deliberately constraining licence releases to artificially reduce licence value; or
 - deliberately constraining licence releases to artificially increase licence value.

Government Position

- Government will examine a range of options for the process of issuing new taxi licences within the parameters of the agreed taxi service licence model, and will consult with industry regarding proposed changes to current policy and processes.
- Alternate options to perpetual licences that will remove barriers to licence ownership and placing certain conditions on licences that will ensure active participation of licence owners in the industry will be considered.

Alignment with Ombudsman's Report

- This aligns with recommendations 26 to 36 in the Ombudsman's Report.

Strategy 5 Review of the number and mix of taxi licences on a state-wide basis

Action 5.1 *Conduct an immediate area by area review of the number and mix of taxi licences using the new Taxi Service Licence Model and waiting time benchmarks and implement the outcomes.*

Synopsis of Feedback

Respondents across the continuum of the industry expressed general support for this action:

- Strong conditional support.
- Ongoing consultation and involvement in implementation, application and long term maintenance of the model sought.

Government Position

- The new model has been developed, consultation has occurred and staff have been trained in its application.
- The new model will be used to review the number and mix of taxi service licences currently operating in all taxi service areas prior to the end of 2010.

Alignment with Ombudsman's Report

- This aligns with recommendations 26 to 36 in the Ombudsman's Report.

Action 5.2 *Undertake subsequent periodic reviews in accordance with the prescribed timeframes*

Synopsis of Feedback

There was broad conditional support for this action across industry:

- Ongoing consultation and involvement in development, implementation, application and long term maintenance of the model sought.

Government Position

- TMR already undertakes reviews within prescribed timeframes. The new model will not affect that process.
- TMR will continue to regularly monitor taxi services across the state to ensure an appropriate number of taxi licences in each service area.

Alignment with Ombudsman's Report

- This aligns with recommendations 26 to 36 in the Ombudsman's Report.

PRINCIPLE – Accountable – Booking companies, operators and drivers will be held accountable for their performance

Outcome **The public can rely upon the Department of Transport and Main Roads as the taxi system regulator**

Strategy 6 **Improve TMR's data collection capacity, data sets and data management systems**

Action 6.1 *Implement data warehouse for taxi booking company data*

Synopsis of Feedback

There were fewer comments made about the actions under this Strategy. In broad terms, the industry parties that were most affected (TBCs) by this action were generally in favour:

- Understanding of this action beyond TBCs seemed limited.
- Opposition centred on intrusions into business privacy, the privacy of drivers and the privacy of passengers.

Government Position

- Provision of data is already part of service area contracts with TBCs.
- While this action is well progressed, it is apparent that it requires clearer explanation to the broader taxi industry. Consequently, it will be subject to inclusion in the ongoing industry engagement process proposed to support the plan.

Alignment with Ombudsman's Report

- The Ombudsman's Report makes no specific recommendations regarding the development and implementation of a data warehouse.

Action 6.2 *Develop a business case for expanding the data warehouse to incorporate all other industry data requirements*

Synopsis of Feedback

In broad terms, affected industry parties – TBCs – were in favour:

- Understanding of this action beyond TBCs seemed limited.
- Opposition centred on intrusions into business privacy, the privacy of drivers and the privacy of passengers.

Government Position

- Once the initial functionality of the data warehouse has been satisfactorily developed and implemented, consideration will then be given to expanding it to include the automatic capture, storage and analysis of data relating to ranked taxi services. This data is either already being collected or capable of being collected via TBC ICT systems.
- While this action is progressing, it is apparent that it requires clear explanation to the broader taxi industry. Consequently, it will be subject to inclusion in the ongoing industry engagement process proposed to support the strategic plan.

Alignment with Ombudsman's Report

- The Ombudsman's Report makes no specific recommendations regarding the development and implementation of a data warehouse.

Strategy 7 Improve the TMR's capability to analyse industry performance and to enforce industry compliance with performance benchmarks

Action 7.1 *Define the proposed key performance indicators in the Queensland Taxi Action Plan.*

Synopsis of Feedback

There were fewer comments made about the actions under this Strategy. In broad terms, industry parties were in favour:

- In supporting this action, there were calls for reporting on progress to industry as part of ongoing consultation associated with implementation.
- When opposition was voiced, understanding of this action as a statement of departmental accountability seemed limited. Opposition centred upon intrusions into business privacy, the privacy of drivers and the privacy of passengers.

Government Position

- Key elements of the Queensland Taxi Action Plan are the proposed performance indicators against which progress towards the achievement of the desired outcomes of this strategic plan are to be measured. Currently these indicators are

indicative only and so the first action that is necessary under this particular strategy is to firm these up.

- TMR will monitor and manage its progress implementing the plan, and provide corresponding advice and recommendations to Government.

Alignment with Ombudsman's Report

- The Ombudsman's Report makes no specific recommendations in this regard.

Action 7.2 *Review and upgrade TMR's in-house data analysis tools*

Synopsis of Feedback

In broad terms, industry parties were in favour:

- When opposition was voiced, understanding of this action as a statement of departmental accountability seemed limited. Opposition centred upon intrusions into business privacy, the privacy of drivers and the privacy of passengers.

Government Position

- Ongoing improvement of data analysis capacity is to be expected from a contemporary public sector agency.
- With the implementation of the data warehouse, there may be data handling and analysis tasks that may be beyond the software suite currently available to TMR. This enabling action will allow better quality use of available data.

Alignment with Ombudsman's Report

- The Ombudsman's Report makes no specific recommendations regarding the development and implementation of departmental data analysis tools.

Action 7.3 *Audit TMR's data and performance analysis skills and implement strategies to address any identified gaps.*

Synopsis of Feedback

In broad terms, industry parties were in favour:

- When opposition was voiced, understanding of this action as a statement of departmental accountability seemed limited. Opposition centred upon intrusions into business privacy, the privacy of drivers and the privacy of passengers.

Government Position

- Government must ensure that it has the appropriate capacity and capability to monitor and enforce industry performance, not just in terms of the achievement of the outcomes of the strategic plan but more broadly in regard to the regulatory framework at large.

Alignment with Ombudsman's Report

- The Ombudsman's Report makes no specific recommendations regarding the development and implementation of departmental data and performance analysis skills.

Action 7.4 *Review the how well TMR regulates the Queensland taxi industry, and identify and examine options for improvement.*

Synopsis of Feedback

There was mixed support for this action across various sectors of industry:

- Negative responses centred upon the concept of de-regulation by stealth.
- No opposition was recorded from TBCs.

Government Position

- With or without a strategic plan, this action occurs organically as part of sound governance of the taxi regulatory framework.
- Work on this action will occur within the parameters of the defined industry engagement process.
- TMR accepts that there is always capacity for improvement in the regulatory instruments and processes that it uses, and is committed to a regulatory approach to the taxi industry that remains contemporary and aligned with the needs of the community and the industry.

Alignment with Ombudsman's Report

- The Ombudsman's Report makes no specific recommendations in this regard.

Action 7.5 *Undertake ongoing, targeted compliance activities.*

Synopsis of Feedback

There was support across respondents for this action. A low number of small-scale owners were opposed:

- There is a strong body opinion that a substantial majority of the taxi industry would be unaffected by the scrutiny associated with TMR compliance activity.
- Cogent opposition to this action centred on the need to apply the compliance effort equally to limousines and other modes that are considered to be in direct competition with the taxi industry.

Government Position

- Ensuring compliance with legislative requirements is fundamental to the delivery of a safe and efficient taxi system.
- TMR will allocate an additional 12 dedicated compliance officers to raise standards of compliance within the taxi industry as well as protect the taxi market through targeted enforcement campaigns throughout Queensland. It is anticipated that 10 will be allocated to compliance activities within south east Queensland and two within regional Queensland. These activities will include protection of the taxi market from illegal operators.

Alignment with Ombudsman's Report

- This aligns with recommendation 55 in the Ombudsman's Report.

Strategy 8 **Improve the capacity of the taxi industry to monitor its own performance and ensure compliance**

Action 8.1 *Develop an industry portal to provide on-line access to information and data to enable industry members to monitor and regulate their own performance.*

Synopsis of Feedback

There was support across respondents for this action:

- Value of data availability recognised.
- A small degree of opposition centred upon intrusions into business privacy, the privacy of drivers and the privacy of passengers.

Government Position

- The principal aim of the industry portal is to improve the capacity of the taxi industry to self-regulate. The portal will enable individual industry members (operators, drivers, taxi management companies, TBCs) to access on-line information specific to their own performance management needs.
- The issue of industry members only being able to access their own data needs to be reinforced across industry.
- In progressing this action, TMR will put into place appropriate privacy features and advise industry accordingly.

Alignment with Ombudsman's Report

- The Ombudsman's Report makes no specific recommendations regarding this issue.

Action 8.2 *Train industry members in the use of the industry portal to enable them to self-regulate.*

Synopsis of Feedback

As the enabler for the previous action, this received a broadly positive reception across industry:

- Value of data availability recognised.
- A small degree of opposition centred upon intrusions into business privacy, the privacy of drivers and the privacy of passengers.

Government Position

- Appropriate training in the use of the industry portal will maximise benefits to industry members.
- TMR will incorporate training in the industry portal into professional development activities for industry stakeholders.

Alignment with Ombudsman's Report

- The Ombudsman's Report makes no specific recommendations regarding this issue.

PRINCIPLE – Customer-focussed – Taxi services will offer high quality and value for money services

Outcome **People will enjoy catching taxis**

Strategy 9 **Improve and enforce driver customer service standards**

Action 9.1 *Implement the Taxi Driver Standards Reform Package to improve customer service.*

Synopsis of Feedback

- Refer to response for Action 1.2.

Government Position

- Refer to response for Action 1.2.

Alignment with Ombudsman's Report.

- Refer to response for Action 1.2.

Action 9.2 *Maintain the taxi hotline and annual 'mystery shopper' surveys*

Synopsis of Feedback

There was support across respondents for this action:

- Considerable support for the Mystery Shopper exercise.
- Positive Mystery Shopper results used as evidence by some respondents that industry reform not required.
- Claims that Taxi Hotline panders to a minority.

Government Position

- Across Australia, jurisdictions have either instituted, or plan to run similar programs to the Mystery Shopper program to gauge taxi performance. In Queensland the Mystery Shopper is not a stand alone measure, with customer satisfaction surveys also undertaken on a quarterly basis.
- The Taxi Hotline and an annual Mystery Shopper survey will be retained.
- TMR will undertake a number of activities to assess the quality of the service that the Queensland taxi industry provides to passengers, and will make the results of those activities both the basis for future improvements, where appropriate, and available to the public.

Alignment with Ombudsman's Report.

- The Ombudsman's report did not include recommendations in this regard.

Action 9.3 *Monitor customer satisfaction with taxi services on an annual basis*

Synopsis of Feedback

There was support across respondents for this action:

- The majority of respondents expressed an interest in community perception of the taxi industry.
- Opposition centred upon Government intervention not being wanted or required.

Government Position

- Taxi passengers will continue to be surveyed in the quarterly cross-modal customer satisfaction survey process that allows comparisons of passenger perceptions across modes.
- TMR will undertake a number of activities to assess the quality of the service that the Queensland taxi industry provides to passengers, and will make the results of those activities both the basis for future improvements, where appropriate, and available to the public.

Alignment with Ombudsman's Report

- The Ombudsman's Report did not include recommendations in this regard.

Strategy 10 **Improve the ability of customers to access comprehensive information about taxi services**

Action 10.1 *Review existing information sources, and the availability, range and usefulness of existing information on taxi services*

Synopsis of Feedback

There was support across respondents for this action:

- Improved information sources were generally welcomed.
- Common issue in opposition was Government intervention where it is not wanted or required.

Government Position

- Improving the quality and quantity of information sources about how to access the taxi industry will benefit the general public as well as the business travel and tourism sectors.
- TMR considers that providing consumers with access to the widest possible range of information about taxis, including their rights as taxi users, via the widest possible range of media will result not just in better informed consumers but better empowered consumers as well.

Alignment with Ombudsman's Report.

- The Ombudsman's Report did not include any recommendations on information to be provided to passengers, except for advising them that the taxi security cameras currently did not record audio...

Action 10.2 *Develop and implement appropriate improvements, including publicity and marketing of the information services*

Synopsis of Feedback

There was support across respondents for this action:

- Improved information sources were generally welcomed.
- Common issue in opposition was Government intervention where it is not wanted or required.

Government Position

- Improving quality and quantity of information sources about taxi services will benefit current and potential taxi users.
- TMR considers that providing consumers with access to the widest possible range of information about taxis, including their rights as taxi users, via the widest possible range of media will result not just in better informed consumers but better empowered consumers as well.

Alignment with Ombudsman's Report.

- The Ombudsman's Report did not include any recommendations in this regard.

Action 10.3 *Publish taxi service levels*

Synopsis of Feedback

There was support across respondents for this action:

- TBCs, in general, supported this action.
- Opposition centred on intrusions into business privacy and the privacy of drivers.

Government Position

- Data collected and analysed regarding Minimum Service Levels (MSLs) is open to publication, both online and through Right to Information (RTI) laws.
- This action is consistent with the principles of open and transparent Government.
- TMR considers that providing consumers with access to the widest possible range of information about taxis, including their rights as taxi users, via the widest possible range of media will result not just in better informed consumers but better empowered consumers as well.

Alignment with Ombudsman's Report.

- The Ombudsman's Report did not include any recommendations in this regard.

Strategy 11 **Investigate and implement options for reducing or better controlling taxi industry costs**

Action 11.1 *Build on current research to develop a detailed and contemporary understanding of the taxi industry cost structure.*

Synopsis of Feedback

There was support across respondents for this action:

- Broad support for better understanding of the industry by regulator.

- Limited opposition centred on intrusions into business privacy and the privacy of drivers.

Government Position

- Better understanding should produce better policy and process with reduced unintended adverse consequences.
- An economic assessment of conventional taxi services in the Brisbane taxi service area has been provided by LEK Consulting, an independent specialist consultancy, to assist in the development of the plan and Government's response to the Ombudsman's Report and its recommendations.
- TMR has a well developed understanding of the cost drivers built into the taxi industry cost model used to review taxi fares.
- Further detailed analysis is also required to understand how costs might be better controlled or even reduced over time with a view to limiting the extent of future fare rises.
- Work has already commenced on an economic analysis of the industry with LEK Consulting in consultation with operators. The results of this work will have a significant impact on the policy decisions that will be made by the department and other government agencies. The consequences of these decisions in terms of their potential impact on the financial viability of individual industry stakeholders need to be clearly understood.

Alignment with Ombudsman's Report

- This aligns with recommendations 24 and 25 in the Ombudsman's Report.

Action 11.2 *Identify and evaluate options for reducing/controlling industry costs and make recommendations to Government*

Synopsis of Feedback

There was strong support across respondents for this action for the potential to enhance profitability for all parties:

- Strong support, especially around the issue of compulsory third party insurance (CTP) premiums
- Limited opposition to this was based on alleged Government motive to reduce fares.

Government Position

- Active consideration of CTP premiums issue is already underway at departmental level.
- In recognition of the consequence of taxi fares rising beyond the reach of many users, consideration needs to be given to potential options to better control or reduce the cost of taxi services into the future. The economic analysis of conventional taxi services in the Brisbane taxi service area is to be followed by similar analyses of wheelchair accessible services and regional taxi services.

Alignment with Ombudsman's Report.

- This aligns with recommendations 24 and 25 in the Ombudsman's Report.

PRINCIPLE – Commercially Viable – The taxi system will be financially viable on a commercial basis

Outcome Improve the productivity of the taxi system

Strategy 12 Improve the productivity of the taxi system

Action 12.1 *Review the findings of the Workplace Rights Ombudsman’s Report and implement the accepted recommendations*

Synopsis of Feedback

In broad terms, while conceding that improvement should always be sought, TBCs were generally opposed to the report. On the other hand, some drivers opposed the report for not going far enough:

- Some strong polarisation of views across industry to the Ombudsman’s Report and its recommendations.
- Support for consideration of recommendations.
- On the issue of bailment, four key positions emerged from respondents:
 - Status quo;
 - Status quo, but abolish set pay ins;
 - Replace bailment with contemporary industrial instrument that would change status of drivers to employees (the “Bailment is WorkChoices” argument); and
 - No Government intervention at all (with no preference expressed).

Government Position

- Legislative amendments will be progressed to require all bailment arrangements be contained in a signed agreement. This will ensure that drivers and operators have written proof of their agreements so that they can be legally enforced. Disputes in regard to the agreement can be adjudicated by the Queensland Civil and Administrative Tribunal.
- The Ombudsman’s report and recommendations have been considered by an Inter-agency Committee...
- Overall, the inter-agency committee supports the intent of the Ombudsman’s report and agrees with the issues that will, for the most part, be addressed through the plan. In summary, of the 56 recommendations, 33 are generally supported. Of the remaining 22, 17 relate to issues that can potentially be addressed through alternative methods and actions as part of the plan

Alignment with Ombudsman’s Report.

- This aligns with recommendations 10 to 21 and 41 to 47 in the Ombudsman’s Report.

Action 12.2 *Review TOPTA to identify opportunities to improve taxi system productivity*

Synopsis of Feedback

There was strong support across respondents for this action:

- Potential legitimate access to new markets was recognised.

- Limited opposition centred on intrusions into the taxi market by alternative modes. May have misunderstood intent.

Government Position

- This action is intended to open the micro transit market to taxis.
- TMR recognises the potential benefits for the entry of the taxi industry to provide micro-transit services. Consequently, the department will examine the existing legislation with a view to removing structural impediments to the commercial viability of the taxi industry wherever practicable.

Alignment with Ombudsman's Report.

- The Ombudsman's Report did not include any recommendations in this regard.

Action 12.3 *Work with other Government agencies to ensure that the procurement of Government funded 'micro' transit services is open and contestable*

Synopsis of Feedback

There was strong support across respondents for this action:

- Potential access to new markets was recognised.
- Limited opposition centres on intrusions into the taxi market by alternative modes.

Government Position

- Contestability for the provision of Government-funded micro-transit services (e.g., HACC funded services) has the potential to provide savings for Government, remove unnecessary duplication and provide an additional revenue stream for taxi operations.
- It is not intended to make participation by taxis in the micro-transit market mandatory.
- TMR recognises the potential benefits for the entry of the taxi industry into the micro-transit and other markets. Consequently, the department will examine the existing legislation with a view to removing structural impediments to the commercial viability of the taxi industry wherever practicable.

Alignment with Ombudsman's Report.

- The Ombudsman's Report did not include any recommendations in this regard.

Strategy 13 Improve choice and innovation within the taxi system

Action 13.1 *Review TOPTA to identify and eliminate systemic impediments to choice and innovation, including but not limited to:*

- *Barriers to entry for new booking companies*
- *Schedule 8 of Transport Operations (Passenger Transport) Regulation 2005 (TOPTR).*

Synopsis of Feedback

There was narrow support across respondents for this action:

- There was no specific comment on the proposed review of Schedule 8;
- Opposition to this action was strongest from taxi service areas where only one TBC currently operates.

Government Position

- It is not TMR's role to protect monopoly arrangements for taxi booking companies in markets where competition provides community benefit.
- Vehicle type has been used for the past 50 years as a key regulatory instrument for enforcing the statutory market entry restrictions that apply to taxi services. Increasingly, however, these provisions are functioning more as a barrier to innovation in the taxi industry than to competition in the taxi market.
- TMR will review all legislation and regulation relevant to the taxi industry to ensure that community needs are met.

Alignment with Ombudsman's Report.

- The Ombudsman's Report did not include any recommendations in this regard.

Action 13.2 *Scan developments in other jurisdictions and internationally on an ongoing basis and provide 'innovation' updates via the industry portal*

Synopsis of Feedback

- There was support across respondents for this action.

Government Position

- This action occurs organically as part of sound governance of the taxi regulatory framework.

Alignment with Ombudsman's Report.

- The Ombudsman's Report did not include any recommendations in this regard.

PRINCIPLE – Green – Taxis will be energy efficient and have a low carbon footprint

Outcome **The taxi system will be productive, efficient and sustainable**

Strategy 14 **Improve the fuel efficiency of the fleet**

Action 14.1 *Implement 'Greening the taxi fleet' ClimateQ initiative*

Synopsis of Feedback

There was support across respondents for this action:

- Support for the Greening the taxi fleet Initiative.
- Incentives sought to convert existing vehicles to low emission vehicles.
- Opposition centred on the notion that market forces would determine nature of fleet and the fallacy that LPG is low emission fuel.

Government Position

- Commitment given to Greening the taxi fleet' ClimateQ initiative.
- As part of the broader Queensland Government response to climate change, ClimateQ, TMR will continue the Greening the taxi fleet initiative as part of its taxi licence allocation processes.

Alignment with Ombudsman's Report.

- The Ombudsman's Report did not include any recommendations in this regard.

Action 14.2 *Raise industry awareness about oil vulnerability and climate change.*

Synopsis of Feedback

There was support across respondents for this action:

- Most supporters didn't see the need for this, but couldn't see it doing any harm.
- Opposition centred on the notion that market forces would determine nature of fleet and the fallacy that LPG is low emission fuel.

Government Position

- The Queensland Oil Vulnerability Mitigation Strategy (OVMS) is the next step in this work and is anticipated to be considered by Government in 2010.
- OVMS may include a community awareness campaign with messages that may be applicable for the taxi industry.

Alignment with Ombudsman's Report.

- The Ombudsman's Report did not include any recommendations in this regard.

Action 14.3 *Promote energy-conscious industry practices (e.g., ecodriving, ecomaintenance).*

Synopsis of Feedback

There was support across respondents for this action:

- Most supporters didn't see the need for this, but couldn't see it doing any harm.
- Opposition centred on the notion that market forces would determine nature of fleet and the fallacy that LPG is low emission fuel.

Government Position

- TMR will ensure consistency between this action and other eco-driving initiatives being progressed through the National Strategy on Energy Efficiency (NSEE).

Alignment with Ombudsman's Report.

- The Ombudsman's Report did not include any recommendations in this regard.

Action 14.4 *Implement a mandatory fuel efficiency standard for taxis*

Synopsis of Feedback

There was opposition across respondents for this action. Respondents from all sectors of the industry opposed the action:

- Seen as unnecessary because market forces would give operators the profit incentive to use most fuel efficient vehicle practicable.
- Vehicles suitable for "Green Wheelchair Accessible Taxis" currently unavailable on Australian market.

Government Position

- This is seen as an action that would be considered for implementation later in the strategic cycle.
- It may well be the case that with the normal cycle of vehicle replacement, the fleet will naturally evolve to meet any proposed standard.

- TMR will monitor the composition of the Queensland taxi fleet and make recommendations to government about whether a mandatory fuel efficiency standard is required by 2015. This is an opportunity for the taxi industry to tangibly demonstrate its concern about environmental and climate change issues to the community.

Alignment with Ombudsman's Report.

- The Ombudsman's Report did not include any recommendations in this regard.

Other suggestions

Synopsis of Feedback

- It was suggested that a passenger assistance fee be introduced. This is a fee payable to the driver of a wheelchair accessible taxi to assist embarkation and disembarkation of people with disabilities.

Government Position

- The examination of options for a passenger assistance fee has been included as a new action within the plan.
- TMR will work with the taxi industry to identify options.

Alignment with Ombudsman's Report.

- No specific recommendations made, but linked to recommendation 38 as a means of exploring practical alternatives.