The Secretary
Economy and Infrastructure Committee
Parliament House, Spring Street
EAST MELBOURNE
VIC 3002

21 July 2016

Dear Economy and Infrastructure Committee Secretary,

**SUBMISSION TO THE PARLIAMENTARY INQUIRY INTO RIDE SOURCING – ACCESS FOR PEOPLE WITH DISABILITIES**





**Submission to:** The Economy and Infrastructure Committee Parliament of Victoria

**Background:**

We, a group of Victoria-based organisations representing and supporting people with a disability, are concerned about the potential negative impacts of ride sharing on the availability of wheelchair accessible point-to-point transportation. Wheelchair accessible point-to-point transportation needs are currently met by Wheelchair Accessible Taxis (WATs). As Uber and other ride-sourcing apps erode the taxi industry, we are concerned that this will lead to a decrease in the number and availability of WATs in Victoria. The Victorian Government must ensure the right of wheelchair users to use ride sourcing should ride sourcing be legalised in this state.

The taxi industry is regulated in Australia at the State level. Each state therefore has its own laws, regulations, safety standards, licencing requirements, guidelines and authorities that regulate the taxi and hire care industry. Different states have different schemes and methods of assistance to support access to taxi services for people with a disability. Taxis are considered ‘public transport’ under the national Disability Standards for Accessible Public Transport.[[1]](#footnote-1)

‘Hire cars’ come under different regulation to taxis. Hire cars are defined as small commercial passenger vehicles that can be booked for hire or award, but not stand at a rank or be hailed on the street. Unlike taxis, hire cars are not currently considered ‘public transport’ in Victoria. Before the launch of Uber, hire cars serviced only the luxury car travel market in Victoria. Until recent reforms, in order to operate legally, the cost of hire cars needed to exceed the luxury car tax threshold. In mandating that hire cars must be luxury vehicles, the Victorian Government deliberately kept hire cars at the top end of the market.

After commencing as a legal hire company in the United States in 2008, Uber adopted a business model operating within hire car and taxi regulation through services called Uber Black and Uber Taxi respectively. It then introduced a third ordering that emulated its illegally-operating competitors, Lyft and Sidecar, whereby unaccredited drivers in unlicensed vehicles can be booked for hire or reward through the UberX app. In operating UberX in Australia, Uber avoids regulations pertaining to hire cars and taxis in the State of Victoria.

Other Australian jurisdictions have had various responses to the service. The Queensland government is opposed to the operation of Uber and passed amending legislation in April which means that Uber drivers could be fined more than $2000 for operating in the state.[[2]](#footnote-2) The New South Wales Parliament legalised Uber earlier this year and regulates it as a ‘hire vehicle’ service.[[3]](#footnote-3) The ACT Parliament has also allowed Uber to operate and was the first jurisdiction in Australia to legalise and regulate ridesharing services,[[4]](#footnote-4) but with strict regulation. In the ACT, Uber drivers are able to work for taxi companies or other services like Uber at the same time, but will need to pay a $600 application fee and a $550 annual fee per vehicle.[[5]](#footnote-5) The Tasmanian Parliament passed a bill in April also allowing ride sharing services such as Uber into the market and will impose similar restrictions that currently exist for hire cars.[[6]](#footnote-6) However, the bill has yet to pass Tasmania’s Legislative Council.[[7]](#footnote-7) Western Australia’s Transport Minister announced in 2015 that ride sharing services such as Uber would be legalised by creating a new licence category.[[8]](#footnote-8) The reforms are to begin in July. The Northern Territory has been the only Australian jurisdiction which has not seen ride sharing services operate. The NT government has had discussions with Uber about introducing the service, but reports in February indicate the NT is likely to ban the services until a review of the hire car industry has been completed.[[9]](#footnote-9)

The illegality of UberX was recently challenged in Victoria. On 18 May 2016, a Victorian County Court judge dismissed the criminal charges made against a Melbourne UberX driver for operating a commercial passenger vehicle without a licence. Uber has stated that this decision has effectively legalised the ride-sharing app in Victoria, although Uber drivers continue to avoid licencing regulation, driver accreditation and commercial passenger vehicle licences.

The technology utilised by ride sourcing means that much of the cost associated with taxi services, such as for taxi metre hardware, call centres and vehicle standards, can be circumvented. This, in addition to the circumvention of licence fees, lowers operating costs and leads to lower fares, making it a popular alternative to regular taxis. The growth of UberX – which has a monopoly on Australia’s ride sourcing market – has relied heavily on people’s dissatisfaction with conventional taxi services.

Should the Victorian Government choose to legalise ride sharing in this state, we call on it to ensure that the rights of wheelchair and scooter users to use the service is reflected in the legislation and people with disabilities are provided access on an equal basis with others. As ‘ride sharing’ and ‘ride sourcing’[[10]](#footnote-10) operations continue to increase their market share of driver-vehicle point-to-point passenger transportation, people who use wheelchairs and other mobility assistance devices will be increasingly disadvantaged if appropriate regulation and incentives to ensure that such businesses service people with a disability are not implemented.[[11]](#footnote-11)

In order to ensure people with a disability are not disadvantaged by the introduction of ride sourcing technologies, and that we continue to respect and facilitate the rights of people with a disability to travel around in our community with some degree of flexibility, the Victorian Government must implement a package of reforms. Further evidence, policy analysis, regulatory impact work and possibly modelling is required to ascertain the most efficient and effective response. In considering which package of reforms and initiative could work to protect and improve the right of people with a disability to travel around our community as ride sourcing’s popularity increases, the Government should consider the recommendations contained in this submission.

In developing a regulatory framework that protects the right of wheelchair users to use ride sharing services, the Victorian Government needs to understand and address the following issues:

1. **Reduction in the number of Wheelchair Accessible Taxis (‘WATs’)**

People using mobility assistance devices such as wheelchairs and scooters require access to specialised vehicles. Point-to-point transportation is crucial for people who use mobility assistance devices due to the difficulties often experienced in accessing transport such as trains and trams and difficulty in getting around in wet weather. While some can access alternative forms of public transport, WATs are often used to complete a journey (for example, from the train station to work). At times and in many situations, for example when public transport is not available in that location or due to strikes or city events (for example, parades down Swanston Street), people who use mobility assistance devices rely solely on WATs.

People with disabilities often find it difficult ordering WATs on public holidays and on days Melbourne has popular events running such as the AFL Grand Final, racing days, the Grand Prix and the Australian Open for example. WAT drivers find it easier to pick up groups of 6 plus, rather than prepare the vehicle to carry a wheelchair.

It is also more difficult on weekends, at night and in wet weather conditions due to a higher demand of vehicles that can transport a higher number of people.

Around 20 000 Victorians rely on WATs as their only means of point-to-point transportation and each year 750 000 WAT trips are taken by people in wheelchair and scooters.[[12]](#footnote-12) As ride sourcing services such as Uber continue to erode the taxi market, we will likely see a decrease in the number of taxis, including WATs, on our roads as the service will become less commercially viable for drivers.[[13]](#footnote-13) In jurisdictions such as New York and San Francisco, WATs have sat idle because drivers haven’t been afforded enough incentive to continue the service and have switched to driving for ride sourcing services.[[14]](#footnote-14) As a result, people with disabilities have experienced a decrease in access to point-to-point transport because accessible services have not been provided by Uber, Lyft, Sidecar or other ride sharing apps.[[15]](#footnote-15)

The 2002 National Disability Standards for Accessible Public Transport set, under the *Disability Discrimination Act*,[[16]](#footnote-16) a target of making WAT response times equal to that of other taxis (which was supposed to be achieved by 2004). This was a response to the long delays that people in wheelchairs had to wait for WATs and a recognition of the importance of transportation to quality of life for people with a disability and their human right to be able to participate in the community on an equal basis.

However, the number of WATs in Victoria has reduced from 565 at its peak in 2013 to below 500 now.[[17]](#footnote-17) Response times for WATs – already on average 23 minutes compared with an average of 8 minutes for a regular taxi – have increased since the introduction of ride sourcing.[[18]](#footnote-18) Wheelchair users therefore wait three times as long as able-bodied people for a taxi.[[19]](#footnote-19) Response time for WATs is increasing rather than decreasing.[[20]](#footnote-20)

Further research is required to establish the cause of the decrease in WAT numbers and increase in WATs response times in Victoria. Although difficult to compare experiences in other jurisdictions – due to Victoria’s status as a world leader through its Multi-Purpose Taxi Programme (‘MPTP’) and the fact that WAT services and incentive schemes vary widely – it is instructive that in jurisdictions in the United States, the growth of ride sharing apps have directly impacted the number of taxis on the road as well as the number of WATs. By the end of 2014, since the introduction of apps such as Uber, WAT journeys in San Francisco had decreased by 44 per cent. These have not been replaced by any wheelchair accessible services offered by ride sharing/ride sourcing companies. Wheelchair users in these jurisdictions have literally be left stranded.

Considering ride sourcing services have been operating in Australia since 2012 and have slowly spread to each State, it would be reasonable to conclude that the rise of these ride sourcing services have contributed to the decrease in the number of WATs on the roads. Since 2013, the proportion of WATs on the road in metropolitan Melbourne has reduced from 15 per cent to 10 percent of all taxis.[[21]](#footnote-21)

The reduction in the number of WATs and the increase in WAT response times undermines the Australian and Victorian Governments’ commitment under the national Disability Standards for Accessible Public Transport within the *Disability Discrimination Act[[22]](#footnote-22)*to target making WAT response times equal to that of regular taxis.[[23]](#footnote-23) It also undermines the Victorian Government’s commitments under the *Transport Integration Act*.[[24]](#footnote-24)

**Recommendations: In responding to the likely reduction of WATs in Victoria due to the popularity of ride sourcing, the Victorian Government could:**

**1(a)** Regulate the ride sharing/ride sourcing industry to ensure access to point-to-point transport for people using wheelchairs and scooters.

**1(b)** Subsidise the modification of vehicles for drivers utilising ride sourcing technologies to ensure an equivalent number of wheelchair accessible vehicles on the road as per the number of WATs following Victorian Government efforts to increase WAT numbers in 2013 (i.e. 15 per cent).

**1(c)** Mandate a certain percentage of wheelchair accessible vehicles as a condition of allowing the legal operation of ride sourcing apps in the market.

* Availability should be mandated as 24 hours a day 7 days a week

**1(d)** Reduce WAT licence fees to zero, subsidise the cost as well as the modification costs of WATs, and provide additional incentives to ensure WAT numbers increase back to, and remain at, pre-Uber levels.

* This would mean that, should ride sourcing continue to increase in popularity, wheelchair and scooter users are being catered for outside of mainstream transportation.
* Propping up the WAT sector through increased incentives has been the response by the Municipal Transport Authority in San Francisco. Following an initial decrease of over 40 percent, then implementation of increased incentives, WAT trip numbers have stabilised in San Francisco, but have not increased back to pre-ride sharing levels, meaning wheelchair users there continue to be disadvantaged by the introduction of ride sharing in that municipality.

**1(e)** Mandate that ride sourcing apps are developed in accessible formats.

**1(f)** Ensure ride sourcing apps collect and make available information about wheelchair and scooter trips and response times.

**1(g)** Increase the amount of wheelchair pick ups drivers must make each month.

**1(h)** Mandate that when a wheelchair booking is made, the nearest WAT is required to pick up the person, regardless of distance that is to be travelled.

1. **The Multi-purpose Taxi Program does not extend to hire cars or ride-sharing apps**

The Victorian Government’s world-leading Multi-Purpose Taxi Program (‘MPTP’) has been operating since 1983 and assists with the travel needs of people with severe and permanent disabilities by offering subsidised taxi fares to members, paying up to $60.00 per trip. The MPTP also pays a ‘lifting fee’ of $16.00 per ride to taxi drivers for picking up people in wheelchairs or scooters. This fee was doubled in 2008 from $8.00 and is indexed to the CPI.[[25]](#footnote-25) MPTP drivers are required to undertake training on the appropriate use of restraints. The MPTP program has offered $44,000.00 towards the conversion costs of WATs in regional areas. It ensures people with a disability can move around in our community and are not marginalised or disadvantaged due to lack of affordable transportation. The total cost of this program is $50million per year.[[26]](#footnote-26)

More than one in 10 taxi fares in Victoria are subsidised by MPTP.

The Victorian Government has gone to some effort to improve access to WAT transport over the past six years. In 2010, 330 WAT licences were released in an attempt to meet a target of having 15 per cent of taxis as WATs as recommended by a 2008 review by the Essential Services Commission. In 2013, when it removed its cap on the number of taxi licences, the Victorian Government made WAT licences $4,000.00 cheaper per year than conventional taxi licences. There were 565 WAT licences in metropolitan Melbourne following this change.

The Victorian Government’s MPTP therefore provides an incentive for taxi companies to incorporate transportation for people in wheelchairs into their business model.

Hire cars have been excluded from the MPTP program. This has had the result of stifling any emergence of a wheelchair accessible hire car market.

The MPTP allows people with disabilities access to point-to-point transportation that is affordable. However, if there is a decrease in the number of WATs on the roads and an increase in the wait time for WATs, people with disabilities will be significantly disadvantaged. If the Victorian Government is to continue its commitment to ensure people with disabilities are given access to affordable and accessible point-to-point transportation, the MPTP needs to be extended to more services than just WATs.

**Recommendations: In response to the fact that the Multi-purpose Taxi Program does not extend to hire cars or ride-sharing apps, the Victorian Government could:**

**2(a)** Implement an innovative, market-based mechanism that utilises new technology and provides incentives for users of ride sourcing technology to acquire wheelchair accessible vehicles and pick up people in wheelchairs.

* This would likely require subsidies for vehicle modification
* This could include a subsidy for a qualified wheelchair/scooter users which would ‘auction’ rides, paying more during peak periods, with funds being transferred electronically in real time utilising a cost-centre arrangement.
* It would be important to ensure the number of vehicles on the road is commensurate with, or exceeds, the peak numbers that were on the road following the 2013 reforms (565 licences in metropolitan Melbourne).

**2(b)** Extend the MPTP subsidy to passengers of accredited ride sourcing operators.

**2(c)** Provide an MPTP-style lifting fee for drivers of ride sourcing wheelchair accessible vehicles.

**2(d)** Provide MPTP-style training for ride sourcing drivers.

**2(e)** Ensure that people with a disability are continued to be given access to affordable point-to-point transport and are not charged more due to the differential pricing model of the ride sourcing industry.

1. **Ride-Sharing/Ride Sourcing Services do not provide access for wheelchair users**

Under section 44 of the *Equal Opportunity Act[[27]](#footnote-27)* a proprietor is not allowed to discriminate in the provisions of goods and services on the basis of impairment. By not offering any wheelchair accessible taxi services, ride sourcing companies such as Uber are currently not acting in accordance with Victorian law. Governments have not yet addressed this issue in legislation, regulation or policy.

In other jurisdictions, residents have filed law suits against Uber and Lyft claiming that they are in violation of the United States’ *Disabilities Act* by denying service to mobility impaired passengers.[[28]](#footnote-28) In response to these claims, Uber argues that it is not a provider of goods and services, but rather, a facilitator. As governments in Australia proceed to discuss, devise and implement appropriate policy and regulation around ride sourcing and ride sharing technologies, it will be important to incorporate appropriate access for people with a disability into these models. Ride sourcing and ride sharing business models should not be exempt from providing access for people with disabilities merely because they are a ‘facilitator’ of transport, rather than a ‘provider of goods and services’.

 *UberAssist*

In May 2015, Uber introduced ‘UberAssist’, a service that enables people with fold up wheelchairs to transfer into conventional sedans and put their wheelchair in the boot of the vehicle. This has been the common practice of wheelchair users who have had issues ordering WATs and opted to order conventional sedan taxis to complete their journey.[[29]](#footnote-29) However, the UberAssist initiative does nothing to replace WATs nor provide access to people who use non-folding mobility aids such as motorised wheelchairs or scooters or people who are not able to transfer out of their manual fold up wheelchair into a car seat. This represents a significant portion of wheelchair users. UberAssist cannot, therefore, be considered a wheelchair accessible transport service.

 *UberWav*

In January 2016, Uber introduced ‘UberWav’, a service that enables people with a disability to request wheelchair accessible vehicles. Different models to facilitate the UberWav service have been trialled and tested. However, there are various issues which make UberWav unlikely to be a viable service which guarantees the provision of wheelchair accessible transportation.

If personal wheelchair accessible vehicles are used, similar to the current UberX model, Uber would need to guarantee that the vehicles comply with the space and safety requirements which are required of WATs. Even if this is able to be achieved, the number of privately owned wheelchair accessible vehicles is very small and often, these vehicles are driven by wheelchair users and usually do not have a driver’s seat and do not necessarily have space to accommodate a wheelchair other than the driver’s own wheelchair. It should also be noted that vehicles funded by insurance such as the TAC or Workcover are not allowed to be used for commercial purposes. The potential for privately owned wheelchair accessible vehicles to be used for ride sharing or ride sourcing is extremely low.

UberWav cannot, therefore, guarantee the provision of wheelchair accessible transportation. Uber’s ‘trials’ of UberWAV have not produced any meaningful data or analysis and have been criticised by disability organisations as being nothing more than a PR stunt.

**Recommendations: In response to the fact that Ride-Sharing/Ride Sourcing Services currently discriminate against wheelchair users, the Victorian Government could:**

**3(a)** Mandate a certain percentage of wheelchair accessible vehicles as a condition of allowing the legal operation of ride sourcing apps in the market.

**3(b)** Establish and subsidise a separate category for ride sourcing to cater for people with a disability.

* Ensure, through an incentive program or other mandated services, that response times are the same as those in the taxi industry pre-Uber.
* This could be achieved through a Public-Private-Partnership (PPP), a separate category of ride sourcing that utilises new technology to provide this essential service.

**3(c)** Mandate the establishment of a centralised booking service/app for wheelchair vehicles mandated use by all ride sourcing drivers.

**3(d)** Ensure bookings by people with a disability of wheelchair accessible vehicles are prioritised over larger groups.

**3(e)** Implement standards for ride sourcing wheelchair accessible transport, including with regard to safety and ability to accommodate large wheelchairs and scooters.

* Standards for ride sourcing wheelchair accessible transport should accord with WAT standards.
* Drivers transporting people with a disability must undergo appropriate character checks.
* Regular inspections to ensure standards are being met should be undertaken.

**3(f)** Mandate that ride sourcing apps are developed in accessible formats.

**3(g)** Ensure ride sourcing apps collect and make available information about wheelchair and scooter trips and response times.

* This technology is available and relatively inexpensive.
* Attention should be paid to access to point-to-point transportation by wheelchair and scooter users in regional areas
* This will be important to measure outcomes of whichever approach is implemented and to ensure an evidence-based approach to addressing the negative effect of ride sourcing’s popularity on wheelchair and scooter users.

As we as a community embrace new technologies, we need to ensure that these technologies are used to benefit people with a disability, not leave them behind.

From:

Australian Disability and Indigenous Peoples’ Education Fund

Disability Advocacy Australia Inc

Youth Disability Advocacy Service

Youth Affairs Council Victoria

Disabled Motorists Australia

Disability Discrimination Legal Service

All Aboard Network

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1. *Disability Standards for Accessible Public Transport 2002* (Cth). These standards set out the minimum accessibility requirements that provides and operators of public transport must comply with, as well as ensuring that access to transport is consistently improved. The transport standards recognise that access to public transport enables people with a disability, their families and their carers to fully participate in community life. [↑](#footnote-ref-1)
2. *Transport Legislation (Taxi Services) Amendment Bill 2015* (Qld) was passed by the Queensland Parliament and amends the *Transport Operations (Passenger Transport) Act 1994* (Qld), *Transport Operations (Passenger Transport) Regulation 2005* (Qld) and *State Penalties Enforcement Regulation 2014* (Qld). For more information see <<http://statements.qld.gov.au/Statement/2016/4/20/parliament-passes-legislation-to-enhance-compliance-measures-for-taxi-industry>>. [↑](#footnote-ref-2)
3. *Point to Point Transport (Taxis and Hire Vehicles)2016* (NSW). [↑](#footnote-ref-3)
4. <http://www.cmd.act.gov.au/\_\_data/assets/pdf\_file/0006/778569/151029\_ACT-TaxiIndustryReforms\_Passengers.pdf>. [↑](#footnote-ref-4)
5. Josh Taylor, ‘The ACT govt welcomes Uber, but with caveats’ (*Crikey online*) <<https://www.crikey.com.au/2015/09/30/the-act-govt-welcomes-uber-but-with-caveats/>>. [↑](#footnote-ref-5)
6. <http://www.abc.net.au/news/2016-04-07/uber-go-ahead-passes-tasmanian-parliament/7308778>. [↑](#footnote-ref-6)
7. <<http://www.parliament.tas.gov.au/bills/4_of_2016.htm>>. [↑](#footnote-ref-7)
8. <https://www.mediastatements.wa.gov.au/Pages/Barnett/2015/12/Green-light-for-on-demand-transport-industry-reform.aspx>. [↑](#footnote-ref-8)
9. <http://www.abc.net.au/news/2016-02-22/nt-govt-bans-ride-sharing-company-uber/7190848>. [↑](#footnote-ref-9)
10. ‘Ride sharing’ and ‘ride sourcing’ are defined for the purposes of this submission as driver-owned and operated vehicles offering one-time rides for a fee at short notice that connect with customers via GPS and smartphone apps such as Uber. Ride sharing is promoted as a way to better utilise the empty seats in most passenger cars and is therefore akin to carpooling. Ride sourcing is the utilisation of apps by commercial operators, similar to a taxi service. Drivers engaging in ride sourcing do not share the same destination as their passengers. This app outsources rides to commercial drivers. [↑](#footnote-ref-10)
11. This submission focuses on people with mobility issues, primarily users of wheelchairs and scooters. The issues raised in this submission also have consequences for other people with a disability. [↑](#footnote-ref-11)
12. Victorian Taxi Services Commission (2015) Data. [↑](#footnote-ref-12)
13. Kirsten Veness, ‘Melbourne’s wheelchair taxis ‘no longer commercially viable’, Uber promises to step in’, *The Age* (online) 27 Mar 2016 <<http://www.abc.net.au/news/2016-03-26/questions-over-how-best-to-serve-disabled-taxi-clients/7274066>>. [↑](#footnote-ref-13)
14. By mid-2014, a quarter of Wheelchair Accessible Taxis in San Francisco sat idle because there weren’t enough drivers. WAT services in San Francisco have not been replaced by wheelchair accessible ride sourcing vehicles, meaning access to flexible point-to-point transportation by people in wheelchairs has decreased in that municipality. Source: San Francisco Metropolitan Transit Authority, quoted in SFGate newspaper, Tuesday, February 25, 2014; Kate Toran, Taxis and Accessible Service director, San Francisco Municipal Transportation Agency, quoted in The Examiner newspaper, 16 September 2014; San Francisco Municipal Transportation

Agency, email correspondence with Estelle Parker, 24 December 2015 [↑](#footnote-ref-14)
15. In San Francisco and New York, the growth of Uber, Lyft and Sidecare have had a negative impact on the wheelchair accessible taxi service. The number of ‘ramp’ (Wheelchair Accessible) taxi pickups in San Francisco has decreased significantly along with the number of taxi trips overall. By the end of 2014, since the introduction of apps such as Uber and Lyft, WAT journeys in San Francisco had decreased by 44 per cent. This was due to drivers moving from the traditional taxi market to ride sourcing. Source: San Francisco Municipal Transportation Agency (2014), Taxis and Accessible Services Division: Status of the Industry, presentation to San Francisco Municipal Transportation Agency Board Meeting, September 16, 2014 (available at https://www.sfmta.com/sites/default/files/agendaitems/9-16-14%20Item%2011%20Presentation%20-%20Taxicab%20Industry.pdf). See also Dwyer, Jim (2016), ‘Wheelchair users hit speed bump in the age of Uber taxis’, 26 January 2016, The New York Times, republished in The Australian Financial Review newspaper

(available at http://www.afr.com/technology/wheelchair-users-hit-speed-bump-in-age-of-uber-taxis-20160125-

gmdb8p) [↑](#footnote-ref-15)
16. *1992* (Cth). [↑](#footnote-ref-16)
17. Victorian Taxi Services Commission (2015) data. [↑](#footnote-ref-17)
18. Victorian Taxi Services Commission (2015) data. [↑](#footnote-ref-18)
19. Victorian Taxi Services Commission network service data: data provided by 13 Cabs and Silvertop Taxi Services Pty Ltd. This data covers calls that are answered by their call centres. [↑](#footnote-ref-19)
20. Victorian Taxi Services Commission (2015) data. [↑](#footnote-ref-20)
21. Taxi Services Commission (2015) data. [↑](#footnote-ref-21)
22. 1992 (Cth). [↑](#footnote-ref-22)
23. Commonwealth of Australia (2002), Disability Standards for Accessible Public Transport 2002, available at Attorney General’s Department website (www.ag.gov.au). The Disability Standards for Accessible Public Transport 2002 set out the minimum accessibility requirements that providers and operators of public transport must comply with, as well as ensuring that access to transport is consistently improved. The transport standards recognise that access to public transport enables people with disability, their families and their carers to fully participate in community life. [↑](#footnote-ref-23)
24. *2010* (Vic). This Act obliges the Government to implement policy that: enables social and economic inclusion and minimise barriers to access; integrates transport and land use to improve accessibility; promotes forms of transport which have the greatest benefit for and least negative impact on health and well-being; and applies the principle of equity which includes equity irrespective or personal attributes, physical ability and location. [↑](#footnote-ref-24)
25. Victorian Taxi Services Commission (2015), *Multi Purpose Taxi Program*, Taxi Services Commission website, [www.taxi.vic.gov.au/passengers/mptp](http://www.taxi.vic.gov.au/passengers/mptp). [↑](#footnote-ref-25)
26. Victorian Taxi Services Commission (2015) data. [↑](#footnote-ref-26)
27. *2010* (Vic). [↑](#footnote-ref-27)
28. See Wieczner, J. (2015), ‘Why the Disabled are Suing Uber and Lyft’, Time magazine, 22 May 2015

(available at http://time.com/3895021/why-the-disabled-are-suing-uber-and-lyft/ and [www.whosdrivingyou.org](http://www.whosdrivingyou.org)). [↑](#footnote-ref-28)
29. It should be noted that issues relating to the willingness and competence of taxi drivers to service wheelchair users and other people with other kinds of disabilities have arisen regularly over the years. [↑](#footnote-ref-29)