**Vision Australia Submission on proposed regulations to the Commercial Passenger Vehicle Bill 2017**

**Submission to: Department of Transport**

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**By email:**

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**Introduction**

Thank you for the opportunity to provide comments on proposed regulations for the Commercial Passenger Vehicle Bill 2017.

People who are blind or have low vision cannot drive and are heavily reliant on transport options such as Commercial Passenger Vehicles (CPV). CPV are a crucial link to maintaining employment, gaining an education, and participating in recreational, sporting and other activities for the blindness and low vision community.

**Accessibility**

Vision Australia’s primary overarching recommendation is that relevant regulations of CPV include accessibility to people who are blind or have low vision, as a vital priority. Apps are commonly used to book and monitor CPV travel and drivers. We would like to stress that applications must be accessible to the screen reading and magnification software that people who are blind or have low vision often use. So too, desktop booking services must meet accessibility guidelines to ensure equal access to point to point transport. Given the correlation between blindness and low vision and old age, access to telephone bookings must remain as older Australians are much less likely to use smartphones and Apps.

We will comment on the below proposed regulations that are relevant to the blindness and low vision community**.**

**Driver identification**

**VA recommendation:**

Driver identification should be accessible to people who are blind or have low vision in a variety of ways. Driver identification is generally included alongside car identification when booking online or via an App. To ensure people who are blind or have low vision know who is driving them, all Apps and online booking methods need to meet best practise web accessibility guidelines.

Driver ID should also be accessible within the CPV for those passengers who hail a car. We recommend that driver ID is available inside the cars as follows:

- In a consistent location within the car

– In Braille

– In large print

**Passenger assistance and routes**

**VA recommendation**

Drivers must be trained on how to guide a person who is blind or has low vision and should treat passengers requiring assistance with respect and dignity. It is unsafe to pull or take hold of a person who is blind or has low vision as a way to guide them to their destination. We know of many instances of injury to a person who is blind or has low vision when they have been incorrectly assisted. Learning the skills of “sighted guiding” is not difficult or time consuming but it greatly increases the safety of the person being assisted.

CPV drivers and the blindness and low vision community would benefit from specific “sighted guide” training being delivered to drivers.

We believe that drivers should be obliged to guide passengers who are blind or have low vision to the entrance of their destination, if requested to do so.

We also believe that drivers must be obliged to collect passengers from their front door of their home rather than tooting a horn from inside the car, if requested to do so.

**Fares**

**VA recommendation:**

We recommend Victorian CPV adopt a key accessibility feature offered in Queensland taxis, which is that fares are audio announced at the end of each journey. Fare audio announcement enables a passenger who is blind or has low vision to know exactly what they owe without having to prompt the driver to tell them the fare and without concern that they are being told an inflated fare.

**Vehicle identification**

**VA recommendation:**

We recommend a consistent, large, high contrast symbol is designed to clearly identify all CPV. The symbol must be visible on all CPV and must be secured in a consistent spot on every CPV. People with low vision cannot easily identify CPV from private vehicles and generally do not have adequate vision to search the whole body of a car with their eyes to look for a CPV symbol. We are aware that some CPV cars, such as Uber, are used as private vehicles when not in use as CPV. For this reason we recommend that the symbol is designed to be removed and replaced when needed.

**Assistance Animals**

**VA recommendation:**

The Equal Opportunity Act 2010 (Vic) protects the rights of people with assistance animals to access public spaces, including public transport. Drivers of CPV must accept assistance animals in accordance with The Act. Not only are adult assistance dogs covered by The Act but so too are dogs in training, which means dogs who are aged 8 weeks and older, in training. Drivers who refuse to take passengers with assistance animals must incur fines and also undergo further training on why assistance animals are vital to those who use them.

**Taxi zones**

**VA recommendations:**

Taxi zones are often located close to the entrance of a building or public space. CPV should be able to use taxi zones to drop of a passenger who is blind or has low vision who would benefit from being delivered in the closest and safest drop off point.

**Exemptions to specific rules**

**VA recommendations:**

Exemption to road rules as outlined in the proposed regulations should be made if the mobility needs of a passenger require the safest drop off or pick up point.

**Child restraints**

**VA recommendations:**

For parents who are blind or have low vision CPV is often vital to the social inclusion of the entire family. Children often need to attend their sporting commitments, social commitments and sometimes need fast access to doctors. For a parent who is blind or has low vision, a CPV is the only way to transport their family quickly and safely. In NSW, taxi customers are able to call ahead and request a cab with child restraints. Vision Australia recommends that Victorian CPV should offer the same service as NSW taxis to customers who need child restraints. At present, small children are allowed to ride in CPV without child restraints, this is dangerous and irresponsible practice. Children of parents who are blind or have low vision should have the same rights to safe point to point transport as their peers. Refusing children who are too small to ride without a chair is also an unacceptable solution. Children of people who are blind or have low vision must not be relegated to trams trains and buses. If they are, the result could be social isolation for these children and parents.

# About Vision Australia

Vision Australia is the largest national provider of services to people who are blind, deaf blind, or have low vision in Australia. We are formed through the merger of several of Australia’s most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

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.

Vision Australia service delivery areas include:

* Registered provider of specialist supports for the NDIS and My Aged Care
* Aids and Equipment, and Assistive/Adaptive Technology training and support
* Seeing Eye Dogs
* National Library Services
* Early childhood and education services, and Feelix Library for 0-7 year olds
* Services to blind and low vision children in schools to maximise educational outcomes
* Employment services, including national Disability Employment Services provider
* Accessible information, and Alternate Format Production
* Vision Australia Radio network, and national partnership with Radio for the Print Handicapped
* Spectacles Program for the NSW Government
* Advocacy and Engagement, 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 unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 26,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of the organisation. Vision Australia is well placed to advise governments, business and the community on challenges faced by people who are blind or have low vision fully participating in community life.

We have a vibrant Client Reference Group, 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 15% of total staff having vision impairment. Vision Australia also has a Memorandum of Understanding with, and provides funds to, Blind Citizens Australia (BCA), to strengthen the voice of the blind community.