



Victorian Equal Opportunity
& Human Rights Commission

Submission to the Inquiry into Ride Sourcing Services

August 2016

About the Commission

The Victorian Equal Opportunity and Human Rights Commission is an independent statutory body with responsibilities under three laws:

- *Equal Opportunity Act 2010* (Vic)
- *Racial and Religious Tolerance Act 2001* (Vic)
- *Charter of Human Rights and Responsibilities Act 2006* (Vic)

The Equal Opportunity Act (EOA) makes it against the law to discriminate against people on the basis of a number of different personal characteristics.

The Racial and Religious Tolerance Act (RRTA) makes it against the law to vilify people because of their race or religion.

The Charter of Human Rights and Responsibilities (Charter) sets out basic human rights for all people in Victoria. It requires government and public authorities to comply with human rights and consider relevant human rights when making decisions.

Services provided by the Commission include:

- a free telephone Enquiry Line;
- a free and impartial dispute resolution service under the *EOA and RRTA*;
- information and education about equal opportunity, racial and religious vilification and the Charter;
- education, training and consultancy services;
- legal assistance to courts and tribunals on questions of law;
- compliance reviews of programs and practices;
- investigations under the *EOA*.

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1. Introduction

The Victorian Equal Opportunity and Human Rights Commission ('the Commission') welcomes the opportunity to make a submission to the Inquiry into Ride Sourcing Services conducted by the Standing Committee on Economy and Infrastructure ('the Inquiry').

In this submission, the term 'point-to-point transport' is used to refer to transportation services which take customers from one designation directly to another, where the pick up and drop off designations, along with the route taken, are determined by the customer. In the Victorian context, point-to-point transport is the collective term encompassing both taxi and ride-sourcing services.

Many people with disabilities rely on point-to-point transport to access education, employment, retail, health and social services, as well as to participate in cultural and community life more broadly. Point-to-point transport is particularly important given that many people with disabilities have limited or no access to public transport or their own car.

The new ride sourcing industry may open new opportunities for people with disabilities to access a broader range of transportation services where those services are accessible. To date, legal protections under the EOA and the Charter have ensured that people with disabilities have accessible taxi services. The question is whether these protections apply sufficiently to the new ride sourcing industry, and if not, how should these deficiencies be addressed. The Commission is of the view that, where there is uncertainty or gaps in the level of protections currently applied to the new ride sourcing industry, it is the obligation of Government to take action to ensure that equitable point-to-point transportation services for people with disabilities are maintained and improved.

This submission addresses the fifth point of the Inquiry's Terms of Reference on "access for people with disabilities". The submission will focus on the following key areas:

- Barriers to accessing point-to-point transport for people with disabilities;
- Obligations under the Equal Opportunity Act;
- Ride sourcing services;
- Considerations in providing equitable services, including accessibility, safety, driver training; and
- Incentives for wheelchair accessible point-to-point transport.

2. Background

The Commission regularly hears directly from people with disability through its Disability Reference Group (DRG). The DRG comprises of people with a range of disabilities, parents of people with disabilities, service providers and advocates. Its role is to provide guidance on systemic discrimination and human rights issues affecting people with disabilities in Victoria, including the Commission's work related to disability. The 2014-2016 DRG had 17 members. In 2015, the DRG identified travel as a key priority area for people with disabilities in Victoria.

The Commission has developed policy expertise in the area of point-to-point transport since 2006, when it conducted research on the accessibility of the taxi industry for people with disabilities. The findings and recommendations of the research were published in a report, *Time to respond: Realising equality for people*

with a disability utilising taxi services (2007). The report identified aspects of the provision of taxi services that may discriminate against people with a disability and made recommendations that sought to improve service provision. The Commission worked closely with the Victorian Taxi Directorate to progress the report recommendations.

In 2010, the Commission produced a follow-up report, *Time to Respond – three years on* (2010), to chart the progress against the recommendations of the 2007 report. Finally, the Commission provided a submission¹ to *Setting the Scene – Taxi Industry Inquiry Issues Paper* (2011). The Commission has sat on the Central Booking Service Advisory Committee, the Taxi Services Commission’s Accessibility Taxi Advisory Committee and the Ministerial Forum for Taxi and Hire Car Services.

The Commission acknowledges that the current ride sourcing industry differs from that of the taxi industry and the extent to which they continue to be distinct may depend on the outcomes of the present inquiry. Noting this, ride sourcing services are similar to taxi services with respect to them both being point-to-point transport services which use motor vehicles. From this perspective, the Commission’s prior work on the taxi industry has assisted in understanding the needs of people with disabilities in accessing point-to-point transport and the barriers for them doing so. This provides a useful lens to inform any proposed regulation of ride sourcing services in Victoria to ensure that the same problems are not replicated. Further, it is important to consider the ways in which taxi and ride sourcing services may intersect to ensure accessible point-to-point transport for people with disabilities in Victoria.

3. Barriers to accessing point-to-point transport

The Commission has identified a number of barriers for people with disabilities accessing taxi services, many of which are also relevant to ride sourcing services. These have been identified within the Commission’s *Time to Respond* research reports as well as concerns raised by Disability Reference Group members and other stakeholders. Some of these barriers include:

- Low availability of wheelchair accessible taxis (WATs).
- Licensees of WATs not giving priority to bookings from passengers who are wheelchair users as required under the licence agreement for M50/M51 taxis.
- Problems with the timeliness of services, including long wait times and delays particularly for WATs.
- Discrimination, including some drivers refusing to provide services to passengers because they have a disability or because they have an assistance animal.
- Drivers being unsure how to provide quality services for passengers with disabilities, such as passengers with communication disabilities. This suggests the need for drivers to be appropriately trained to provide services to passengers with disabilities.
- Issues with accessibility to the booking process, such as long wait times to answer booking calls or voice recognition booking systems, particularly for people with disabilities that affect their speech.

In addition, over the past two years, there has been a decrease in the number of WAT licences issued in Victoria. This has been most significant in metropolitan

¹ VEOHRC, *Submission to Setting the Scene – Taxi Industry Inquiry Issues Paper* (June 2011).

areas, where the number of WAT licences has fallen by 61, from 504 to 433 between 2014 and 2016.² During this same period, conventional taxi licence numbers have increased by 343, from 3,826 to 4,169.³ Lower availability of WATs is likely to further intensify issues with long wait times for passengers with disabilities.

Meanwhile, the usage of ride sourcing services in Victoria has increased in recent years. The changing landscape of point-to-point transport demonstrates the need for the government to give due consideration to ensuring accessible point-to-point transport for people with disabilities in Victoria, within the context of both taxi and ride sourcing services and how they operate together.

4. Obligations under Equal Opportunity Act

The EOA provides a number of important protections to safeguard the accessibility of point-to-point transportation services for people with disabilities. These safeguards address the barriers experienced by people with disabilities in accessing point-to-point transportation. Obligations under the EOA apply to all services providers, including transportation services. Under Victorian law, it is yet to be determined the extent to which ride-sourcing booking platforms such as Uber are considered a transportation service provider for the purposes of the EOA or whether individual drivers alone have obligations as transportation service providers under the EOA. This question may be the subject of a future determination and will depend on a range of factors.

Below is a summary of the key obligations under the EOA relevant to point-to-point transportation service providers. The EOA establishes specific obligations on services providers, including to prohibit discrimination, make reasonable adjustments, eliminate discrimination and refrain from assisting or authorising discrimination.

4.1 Prohibition of discrimination by service providers

The EOA provides protection against discrimination, sexual harassment and victimisation on the basis of an attribute, including disability.⁴ The EOA makes it unlawful to discriminate against another person

- by refusing to provide services to the other person
- in the terms on which services are provided to the other person
- by subjecting the other person to any other detriment in connection with the provision of goods or services.⁵

The EOA prohibits discrimination in the area of services whether or not the services are provided for payment⁶.

The term “services” is inclusive and given a wide meaning⁷. It includes services connected with transportation or travel.⁸

² Taxi Services Commission, *Taxi licence statistics* (5 August 2016) <<http://taxi.vic.gov.au/about-us/overview/new-taxi-licences-issued>>. Note that the number of WAT licences have decreased only slightly in country and rural areas and increased slightly in regional areas over this period, hence this problem appears to be mostly specific to metropolitan areas.

³ *Ibid.*

⁴ *Equal Opportunity Act 2010* (Vic) s 6.

⁵ *Ibid* s 44(1).

⁶ *Ibid* s 44.

⁷ *IW v Perth* [1997] HCA 30; 91997) 191 CLR 1.

⁸ *Equal Opportunity Act 2010* (Vic) s 4.

4.2 Requirement to make reasonable adjustments

Under the EOA, service providers including those providing transportation or travel services must make reasonable adjustments for people with disabilities to participate in or access services or derive any substantial benefit from a service⁹. What is considered “reasonable” will depend on a number of factors.¹⁰

A service provider has an obligation to make reasonable adjustments for people with disabilities unless it is not reasonable to do so taking into account considerations such as the financial circumstances of the service provider and the financial impact in making the adjustment.¹¹ A service provider is also not required to make adjustments for people with disabilities where a person with disabilities could not participate in or access the service or derive any substantial benefit from the service even after the adjustments are made.¹²

4.3 Positive duty

The EOA imposes a positive duty on service providers to take reasonable and proportionate steps to eliminate discrimination, sexual harassment or victimisation as far as possible¹³. This requires a service provider to be proactive about eliminating discrimination and take steps to prevent discriminatory practices before they occur.

In determining whether a measure is “reasonable and proportionate”, the EOA sets out a number of factors that must be considered including:

- a. the size of the person's business or operations;
- b. the nature and circumstances of the person's business or operations;
- c. the person's resources;
- d. the person's business and operational priorities;
- e. the practicability and the cost of the measures¹⁴.

The positive duty may be implemented progressively over time. It cannot be the subject of a contravention complaint to the Victorian Equal Opportunity and Human Rights Commission for dispute resolution or to Victorian Civil and Appeal Tribunal (VCAT).

4.4 Prohibition on assisting another person to discriminate

Under s 105 of the EOA, a person must not request, instruct, induce, encourage, authorise or assist another person to contravene the EOA.

A claim of contravention of the EOA may be made against the person who authorised or assisted the contravention, or the person who contravened the EOA, or both. Such complaints can be brought before the Commission for dispute resolution or an application may be made directly to VCAT.

5. Ride sourcing services

As outlined above, the definition of “services” under the EOA is to be interpreted widely. The provision of transportation booking services, such as those provided by Uber, are a “service” for the purposes of the EOA. As such, transportation booking services must comply with the responsibilities outlined above, including non-

⁹ Ibid s 45(1).

¹⁰ Ibid s 45(3).

¹¹ Ibid s 45(3).

¹² Ibid s 45(2).

¹³ Ibid s 15.

¹⁴ Ibid s 15(6).

discrimination with regard to access to its booking services and payment methods, and reasonable adjustments for people with disabilities to access the booking platform.

Ride-sourcing transportation services are also “services” for the purposes of the EOA. The question is who has obligations under the EOA with regard to vehicle accessibility – whether it is the transportation booking service, the point-to-point transportation service provider (the driver of the ride-sourcing vehicle) or both. As noted above, this legal question is yet to be determined under Victorian law. It is an area of some complexity and as such the following examples are illustrative rather than determinative.

If a driver of a ride-sourcing vehicle is considered an employee or agent of a booking company then the company may have obligations under the EOA, as well as the individual driver. Whereas, if a driver of a ride-sourcing vehicle is an independent contractor, the driver may bear those responsibilities personally.

If a driver of a ride-sourcing vehicle is considered an independent contractor, they may be exempt from providing accessible transportation for people with disabilities if a person requires adjustments in order for them to access the service and it is not reasonable for the driver to provide adjustments.¹⁵

Ride sourcing companies such as Uber make clear that they do not consider themselves as providing transportation services but rather their service is limited to providing the technology platform that enables users of mobile applications or websites to arrange and schedule transportation with independent third party transportation service providers under an agreement.¹⁶ Uber do not consider drivers as employed by Uber.¹⁷

Uber has established *Uber Partner and Rider Standards* which places responsibility for anti-discrimination laws on the driver of a ride-sourcing vehicle¹⁸ consistently with its position that drivers are independent contractors.

Whether a driver of a ride-sourcing vehicle is an independent contractor or an employee of the transportation booking service will depend on an assessment of the relationship between the transportation booking service and the driver of a ride-sourcing vehicle. In Australia, courts will consider the totality of the relationship in order to determine whether a person is an independent contractor or employee. Some common indicators in such assessment include the degree of control over how work is performed, hours of work, expectation of work, risk, superannuation, tools and equipment, tax, method of payment, and leave.¹⁹

In the United States of America (US), the Californian Labor Commissioner has found that an Uber driver was an employee of Uber and not an independent contractor.²⁰ In reaching this determination, the Labor Commissioner considered a range of factors including Uber’s control over the whole operation, the integral business

¹⁵ Ibid 46.

¹⁶ See Legal Terms and Conditions at Uber website: <<https://www.uber.com/legal/terms/au/>>

¹⁷ Ibid.

¹⁸ See <https://www.uber.com/legal/community-guidelines/en/> “Uber expects compliance with all state, federal and local laws governing the transportation of riders with disabilities. Violation of these laws, including with respect to the use of service animals, constitutes a breach of the parties’ licensing agreement. Service animals must be accommodated in compliance with accessibility laws. Reports of refusing to transport a rider with a service animal will lead to deactivation of the Uber account.”

¹⁹ See Fair Work Ombudsman, <<https://www.fairwork.gov.au/how-we-will-help/templates-and-guides/fact-sheets/rights-and-obligations/contractors-and-employees-whats-the-difference#employeecontractor>>.

²⁰ *Barbara Ann Berwick v Uber Technologies Inc*, Decision of the Labor Commission of the State of California, Case no. 11-46739 EK, 3 June 2015.

connection between the driver and Uber, Uber's vetting of drivers, its registrations standards, the free use of Uber's intellectual property, and the payment structure. It is noted that US law is likely to have different considerations as to what constitutes an employee and as such has limited relevance to the Victorian context.

In Australia, the Australian Taxation Office (ATO) has issued guidelines requiring drivers for technology platforms operated by third party facilitators be registered for Good and Services Tax where they are "carrying on an enterprise".²¹

Any assessment of the relationship between a transportation booking service and a driver of a ride-sourcing vehicle will need to be assessed on an individual basis to determine the nature of the relationship.

If a driver of a ride-sourcing vehicle is deemed to be an independent contractor the obligations under the EOA fall exclusively on the individual driver rather than the booking platform. The driver would therefore bear the financial costs or other difficulties of making adjustments for accessible transport and may be exempt from making adjustments. A ride-sourcing driver who is exempt from obligations under the EOA may lawfully discriminate against people with disabilities who require adjustments. In this situation, the protections under the EOA are nugatory.

6. Considerations in providing equitable and accessible services

Under the Charter, all people in Victoria may exercise their rights on an equal basis without discrimination.²² The Government and public authorities have obligations to ensure that people with disabilities have access to transportation services on an equal basis to others. The Government therefore has a responsibility to regulate to ensure equitable access to transportation services. Where access to services are diminishing for people with disabilities the Government must take action to maintain and improve equitable transportation services.

The Commission notes that a core focus of this Inquiry is to assess the need for, and appropriate structure of, regulation for ride sourcing services in Victoria. The Commission supports a regulatory framework that ensures people with disabilities have equitable access transport services. Various States and territories across Australia are approaching regulation of the ride-sourcing industry in different ways.²³

In considering strengthening of transportation services, the Commission urges the Inquiry to consider the following issues relevant to providing equitable services for passengers with disabilities. These considerations have been informed by our previous research into the taxi industry and issues raised by 2014–2016 Disability Reference Group members and other key stakeholders.

²¹ See ATO Guidance <<https://www.ato.gov.au/Business/GST/In-detail/Managing-GST-in-your-business/General-guides/Providing-taxi-travel-services-through-ride-sourcing-and-your-tax-obligations/>>

²² Charter, s 8.

²³ See for example *Taxi and Hire Vehicle Industries Amendment Act 2016* (Tas); *Point to Point Transport (Taxis and Hire Vehicles) Bill 2016* (NSW); Government of Western Australia, *On-demand Transport: A discussion paper for future innovation* (2015); *Road Transport (Taxi Industry Innovation) Legislation Amendment Regulation (No. 1) (No. 20 of 2016)* (ACT); South Australia Government Press Release <http://www.premier.sa.gov.au/index.php/jay-weatherill-news-releases/381-state-government-to-reform-the-taxi-and-chauffeur-vehicle-industry> (April 2016).

6.1 Accessibility

Point-to-point transport needs to be accessible to people with a range of disabilities. Accessibility encompasses both (a) access to vehicles as well as to (b) booking and payment methods.

6.1.1 Access to vehicles

Passengers with disabilities can have a range of access requirements, for example, wheelchair or scooter access, assistance animals and communication access. Currently, there is one ride sourcing booking service in Victoria that promotes itself as being accessible, uberASSIST. uberASSIST vehicles accommodate folding wheelchairs, walkers or collapsible scooters but not the vast majority of electric wheelchairs and scooters. Fully accessible vehicles need to accommodate a range of access requirements, including all types of mobility aides, which may include safe lifts into vehicles and adequate allocated space.

Some possible means of addressing supply issues of accessible vehicles across point-to-point transport operators include:

- minimum targets for the proportion of wheelchair accessible vehicles (WAVs);
- minimum accessibility standards for each WAV; and
- incentive schemes for drivers of WAVs (see Section 7).

6.1.2 Access to booking and payment systems

Booking and payment options for point-to-point transport need to be as accessible as possible to people with a broad range of disabilities.

Some ride-sourcing services such as Uber have incorporated accessibility features in its apps for some operating systems (e.g. Android and iOS) for both passengers who have visual disabilities or who are deaf or hard of hearing.²⁴ It is important that point-to-point transport services incorporate accessibility features across all operating systems.

6.2 Safety

Point-to-point transport needs to be safe for passengers with disabilities. Safety incorporates physical safety when entering and exiting the vehicle and during the journey. The Commission also emphasises the importance of safeguarding passengers with disabilities against being victims of physical and sexual assault within the provision of point-to-point transport services. In 2014, the Commission published its research report, *Beyond Doubt: The experiences of people with disabilities reporting crime*.²⁵ This report notes that that people with disabilities are more likely to be victims of crime than the general population.²⁶ The experience of

²⁴ Uber Newsroom, *Improving Accessible Transportation Options in Toronto* (30 October 2015) <<https://newsroom.uber.com/canada/accessible-transportation-in-toronto/>>.

²⁵ Victorian Equal Opportunity and Human Rights Commission, *Beyond Doubt: The experiences of people with disabilities reporting crime* (2014).

²⁶ Victorian Health Promotion Foundation (VicHealth), *Preventing Violence Against Women in Australia: Research Summary* (2011) 5, 5; Stop the Violence Project, 'Stop the Violence: Addressing Violence Against Women and Girls with Disabilities in Australia' (Discussion Paper, National Symposium on Violence Against Women and Girls with Disabilities in Australia, 25 October 2013); Krista Jansson, 'Domestic violence, sexual assault and stalking – 2005/06 British Crime Survey' in Kathryn Coleman et al., *Home Office Statistical Bulletin 02/07, Homicides, Firearm Offences and Intimate Violence 2005/2006* (2007).

crime is most severe for women, people with cognitive impairments and people with communication disabilities.²⁷

Some possible means of addressing safety across point-to-point transport operators include:

- minimum vehicle safety standards (e.g. suitable restraint systems, safe lift systems into the vehicle)
- measures to ensure that drivers are licenced and skilled drivers (e.g. minimum period for holding a driver's licence, screening for driving offences)
- driver screening for assault-related criminal convictions

6.3 Bookings and driver service provider awareness and training

The Commission is of the view that providers of transportation booking services and drivers of point-to-point transport services should be aware their legal obligations under equal opportunity laws. The Commission also supports training on the broad range of access that people with disabilities may, depending on their disability, require. It is noted that some ride-sourcing booking services offer specific services for passengers with disabilities that are run by drivers with accessibility and disability training, such as uberASSIST. Driver training requirements should not limit the services available to people with disabilities.

7. Incentives for wheelchair accessibility

7.1 Peer Review Schemes for Ride-Sourcing

The ride-sourcing model has some in-built incentives. Specifically, drivers can be individually rated. This enables passengers with disabilities to negatively rate drivers who do not provide high quality and non-discriminatory services to them, thereby incentivising a high standard of service provision. The peer review model is an incentive scheme for people with disabilities who are able to access ride-sourcing services, but does not itself address limited availability of WAV for people who require wheelchair access in point-to-point transport.

7.2 Possible Subsidy Schemes

7.2.1 The case for subsidy schemes

As aforementioned, there is currently a limited supply of WAVs within the ride-sourcing industry. Research into the taxi industry provides some insights into the reasons for this. WAT license holders have limited capacity to generate sufficient trips to match the average income of a conventional taxi.²⁸ This is affected by downtime associated with dead running, time taken to load/unload a WAT passenger, the longer WAT trip length/duration and the ability to secure conventional

²⁷ Lynne Coulson Barr, 'Safeguarding People's Right to be Free from Abuse: Key considerations for preventing and responding to alleged staff to client abuse in disability services' (Occasional Paper No.1, Disability Services Commissioner, 2012) 8; Carlene Wilson and Neil Brewer, 'The incidence of criminal victimisation of individuals with an intellectual disability' (1992) 27(2) *Australian Psychologist*, 114–117, 115; State of Victoria, Department of Human Services, *Victoria's action plan to address violence against women & children 2012-15* (2012) 26 <http://www.dhs.vic.gov.au/for-business-and-community/community-involvement/women-in-the-community/preventing-violence-against-women/action-plan-to-address-violence-against-women-and_children>; VicHealth, above n 5, 5.

²⁸ Victorian Equal Opportunity and Human Rights Commission, *Time to respond: Realising equality for people with a disability utilising taxi services* (2007); Victorian Equal Opportunity and Human Rights Commission, *Time to respond – three years on: Realising equality for people with a disability utilising taxi services* (2010).

taxi trips in addition to WAT trips.²⁹ This highlights the importance of creating incentives for increasing the numbers of WAV in point-to-point transport.

7.2.2 Existing subsidy schemes in the taxi industry

The taxi industry has addressed this through a subsidy scheme, the Multi-Purpose Taxi Program (MPTP). MPTP is operated by the Victorian Taxi Services Commission and provides subsidised taxi fares to eligible people with severe and permanent disabilities, paying up to \$60 per trip.³⁰ The subsidy also includes a lifting fee for drivers when they assist a person in a wheelchair or scooter in boarding the taxi using an electric lift. This provides payment to drivers for this lifting service without any additional fee to passengers with disabilities.

7.2.3 Options for the ride-sourcing industry

Should the Victorian Government enact legislation to regulate ride-sourcing services, due consideration should be incentivising the provision of accessible point-to-point transport for people with disabilities.

One option may be to expand MPTP to the ride-sourcing industry to incentivise an increase in the number of WAV within this industry. However, consideration would need to be given to whether this may in turn decrease the number of licenced WATs within the taxi industry and whether this may decrease the number of wheelchair accessible vehicles available in point-to-point transport systems overall. The Commission recommends that this issue be given due consideration in consultation with people with disabilities and other relevant stakeholders.

The Commission also notes that the MPTP scheme was reviewed in 2015 and the report will be released sometime this year. The Victorian Government is also currently working with the National Disability Insurance Agency to finalise arrangements for how MPTP members will receive transport support through the National Disability Insurance Scheme (NDIS). The Commission recommends that due consideration of these service arrangements, once finalised, also be given when devising the most appropriate incentive scheme for providing accessible point-to-point transport services to people with disabilities.

8. Conclusion

Mobility contributes to social connectedness and participation in every day life, including fostering health and wellbeing, social participation, access to employment, health care, cultural life, and community involvement.

The Commission is concerned to ensure that point-to-point transportation services be maintained and improved on a non-discriminatory basis for people with disabilities. People with disabilities are entitled to equitable access to transportation services. Ride sourcing services provide an opportunity to increase transportation options for people with disabilities. However, it is unclear how current legal safeguards under the EOA extend to the industry, and if obligations fall on individual drivers there is concern that the financial cost of providing accessible vehicles may be unreasonable.

The Commission commends the Standing Committee on Economy and Infrastructure for examining the issue of accessibility for people with disabilities in the new ride sourcing industry. The Commission encourages the Government to take action to ensure that existing legal protections under the EOA for point-to-point transportation services are maintained and improved so that people with disabilities remain able to access point-to-point transportation services.

²⁹ Ibid.

³⁰ Ibid.

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