

Department of Infrastructure, Transport, Regional Development, Communications  
and the Arts  
Australian Government  
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29<sup>th</sup> June 2023

To Whom it May Concern,

## **Re. Response to the 2022 Review of the Disability Standards for Accessible Public Transport**

### About AACTRS

The Assistance Dog Advisory Committee-Taxi & Rideshare Services (AACTRS) is a national Committee composed of senior members of five key organisations:

- Assistance Dogs Australia
- Blind Citizens Australia
- Dog Guide Handlers Australia
- Guide Dogs Australia
- TravelPaws

The committee aims to deliver a united approach to preventing and eliminating refusals in taxi and rideshare services in Australia for people with approved Assistance Dogs.

As part of its mandate, AACTRS will be co-designing with a joint Victorian based working group (Assistance Animal Refusals Working Group) comprised of Victorian Equal Opportunity & Human Rights Commission, Department of Transport & Planning and the Regulator, Safe Transport Victoria.

### Experiences of Taxi/Rideshare Services by People with Assistance Animals

People with disability are frequently denied access to taxi and rideshare services when seeking to travel with their assistant dog. Blind Citizens Australia (BCA) described this problem in its response to the Reforms of the Disability Standards for Accessible Public Transport (DSAPT) 2002 in August 2022.<sup>1</sup>

In consultation with the members of our organisations, we have heard that some people with assistance dogs now only travel with Uber Pets – the \$5 surcharge considered less bothersome than potentially being argued with or left stranded on the roadside. Others rely on support worker funding to secure reliable transport or have personal contacts with specific taxi drivers, limiting their options and sometimes causing delays. Fear of not being able to return home and dependence on friends and family for transportation are also common concerns. Furthermore, they face reduced access to available taxis and have had to seek alternative means of transportation.

Our position is clear: people with disability should not have to pay additional sums of money to avoid illegal discrimination.

Additional education is needed for taxi and rideshare providers and drivers, but it will not solve the problem. Even when informed that they are in breach of the DDA, drivers continue to deny service to people with dog guides and other assistance animals. Some taxi and rideshare drivers have gone so far as to lock their doors to deny access.

Accordingly, the Transport Standards must be amended to explicitly include both taxi providers and rideshare services, and to make companies and drivers responsible for complying with the Transport Standards. The Transport Standards must also be amended to state that a breach of the Transport Standards is unlawful.

Stronger enforcement is also essential. Taxi and rideshare providers will continue to discriminate against people with disability until such time as there are meaningful consequences for deliberately breaching the DDA and the Transport Standards.

#### Recommendations:

1. Amend the Transport Standards to explicitly include rideshare services, and to make both rideshare companies and drivers responsible for complying with the Transport Standards.
2. Amend the Transport Standards to state that a breach of the Transport Standards is unlawful and begin an education campaign to ensure taxi and rideshare providers are aware of their responsibilities under the law.
3. Amend the Transport Standards to require all taxi and rideshare providers to affix identifying braille and tactile lettering decals to their vehicle door

exteriors. The company and driver's names and the licence plate details should also be included in a readily available standard print, large print and braille document that summarises the Transport Standards.

We stand ready to work with all State and Territory Governments on improving access to taxi and rideshare services for people travelling with assistance dogs, but urge the Federal Government to set the tone by implementing the recommended changes to the Transport Standards.

Nina Smith (AACTRS Chairperson) can be contacted at [nina@travelpaws.org](mailto:nina@travelpaws.org) to discuss this submission.

Sincerely,



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<sup>1</sup> Blind Citizens Australia, "Stage 2 Consultation Response to Reforms of the Disability Standards for Accessible Public Transport (DSAPT) 2002," 9 August 2022, <https://www.bca.org.au/wp-content/uploads/2022/08/BCA-Stage-2-DSAPT-consultation-submission-v1.0-09082022.docx>