

Committee Secretary
Public Works and Utilities Committee
Parliament House
George Street
Brisbane Qld 4000

10 April 2017

Dear Sir/Madam,

Thank you for giving us the opportunity to write a submission to the Parliamentary Committee who is reviewing the Transport and Other Legislation (Personalised Transport Reform) Amendment Bill 2017. My name is Lauren Webber, I am [REDACTED] years old & I am a taxi operator & licence owner in south east Brisbane. I have a fleet of [REDACTED] Yellow Cabs & have [REDACTED] drivers of varying ages, backgrounds & full time, part time & casual driving schedules. I employ [REDACTED] people to help run my fleet, including [REDACTED] full time workshop mechanic, [REDACTED] changeover/fleet supervisors [REDACTED] admin/office staff & myself as Managing Director.

I was brought into the taxi industry a little over 7 years ago when my father decided to semi-retire & move away from what had been his long term & full time career as Managing Director in road sweeping machinery manufacturing, as well as selling his road sweeping operations business. He was looking for something close to home, something a little different & something he could still be hands on in whilst moving further into retirement. He wanted a secure business & one that he could include me in & eventually pass the business on to me in his later years when he wished to enter full time retirement as a self-funded retiree. To aide in his self-funded retirement, as well as purchasing the taxi business, in 2012 he also bought a taxi service licence.

Unfortunately, my father passed away fairly suddenly & unexpectedly in April of 2016. Even though I had been involved in the business since 2010, & was used to running the day to day operations as Admin Manager, I was suddenly thrown into a whole new world where I became Director & took on the extra responsibility of making sure we were compliant across all taxi industry regulations, getting to know taxi lease owners, dealing more intricately with our finances, making decisions with regard to our vehicles, and many other areas that were once upon a time managed by my father.

As this was happening, our industry was thrown into what I consider to be complete chaos. We were suddenly facing drastic, ill-informed, & un-just changes that we had not faced before. The rushed & mishandled introduction of ride-share into our industry has caused irreparable damage to my business & value of my family's taxi licence, our industry as a whole & for everyone that is in some way involved in taxis in Queensland.

Since the first stage of reforms have taken place (but to be completely honest, these effects had started long before any proper "legalisation" had occurred), I have seen my business take a very worrying nose-dive into serious debt & a worrying future. Our profits have all but disappeared, we cannot find enough drivers to fill all our shifts, earnings per shift are down at least 40% since the introduction of ride-share in Queensland, & yet the vast majority of our overhead costs remain the

same. We have had to cut costs across all facets of business that are in our control to change in an effort to keep our doors open & keep all those people I mentioned in my first paragraph in a job.

There may be irreparable damage across my business & our industry, but there is still a chance to make this industry viable for all of those people & families that believe in the taxi industry & want to stay a part of it & make their living from it. With the correct & fair legislation, & the opportunity to still decide what the future of most of our legislation will be, as a whole industry, we can still move forward. This is only possible if legislation creates a fair & even playing field for all involved.

Before the introduction (legal or otherwise) of ride-share, we were essentially a supply & demand industry. Government gave us targets to meet with respect to customer wait time & overall effectiveness within the community of our industry & we met every single one of these targets. In most cases, we surpassed the expectations, as referenced in many documents, research papers & parliament submissions from Taxi Council Queensland. If wait times increased to a worrying amount, research was undertaken to work out why & whether the population required more taxis to service them whilst still maintaining a balance between wait time & all taxi drivers/owners/operators still being able to make a decent living.

I challenge anyone to tell me exactly how many ride-share vehicles are operating across Queensland now. That impossible to confirm number, on top of our taxis, has created a complete flood of the market. This may be wonderful for customers whose wait time has been slashed again, but every single person – taxi or ride-share – trying to make a living in this industry is now struggling. There are simply too many vehicles on the road. This is why we were always restricted to the number of taxis that could operate. Given that taxis operate on a government issued licence & that there is no foreseeable plan to introduce more taxi service licences, then ride-share should be looked at as a way to curb the number of vehicles available for personalised transport so that everyone has a chance to make a good living. If the introduction of ride-share licences goes ahead (which it should), then serious consideration needs to be given as to how many should be handed out & what the impact of that will be across the board.

Obviously, that environment we once had, created a healthy demand for taxi service licences. Many people invested their life savings, their homes, their retirement funds & superannuation funds into investing in a taxi service licence. These investors, these people & their families, thought they were buying into something that could provide for their futures. It was government supplied & backed – no one in their right mind thought that the government would completely ruin these investments. How wrong we all were, including my own family. Where a taxi service licence was once worth as much as a modest house, it is now worth so little that we are under pressure to repay huge amounts of money that was borrowed from the bank to purchase the licence. Money we do not have because our business is continuing to struggle to make ends meet, all because of the mishandled way ride-share was allowed to enter our state. It is all a vicious cycle, brought about by an untrustworthy government who sold out their own hard working, tax paying, and law abiding people. We were sold out to allow a multinational, law breaking, tax avoiding company to come in & steam roll us little guys out of business.

Since stage one of reforms have been passed & implemented, I have seen precisely no benefit to my own business apart from some minor savings in governmental fees. What happened to the promise that legalising ride-share would not disadvantage taxis & a level & fair playing field would be created? With the impending introduction of stage 2 reforms, I see this as an opportunity for parliament to set things right & truly create a fair environment for all.

I urge all interested parties to carefully & thoroughly read the submission from Taxi Council Queensland. I have attached a summary of their submission at the end of mine. I challenge anyone to find what would not work or would not be fair by following their lead, taking their ideas & implementing legislation based on what they have written as their requirements. If the name of the game is a fair industry with maximum importance on customer choice & safety, then I cannot see how anyone could argue against what Taxi Council Queensland has proposed.

The need to have an independent commission to police & enforce rules & regulations is paramount. Just one example of laws being flouted since legislation changes started is the total lack of abiding by, or enforcing of, that only taxis can use taxi ranks or pick up hails. One visit to the nightclub precincts in Brisbane on a weekend night would be enough for anyone to see this law (amongst many others) being completely disregarded with not enough enforcement officers out there to enforce compliance. What is the point in putting the laws or rules in place if no one is out there making sure they are properly enforced?

There is also an enormous need to maintain the requirement for Bailment Agreements between operators & drivers. This agreement ensures the safety of both operator & driver, so that neither can be exploited in any way. They are a quick & simple document that accurately & effectively lay out the terms between operator & driver. All personalised transport drivers should be covered by a Bailment Agreement.

Standardisation of minimum requirements for Security Cameras & anti-tamper GPS should be enforced across all forms of personalised transport. These 2 things ensure the safety of both customer & driver & this is precisely why both were implemented & legislated within taxis. The necessary requirements should be created with the input of the Queensland Police Service & should take into account passenger & drivers privacy rights.

As the owner/operator of a fleet of taxis, I am also an authorised taxi security camera download technician & I am often called upon by the Queensland Police Service to provide images & video from inside & outside taxis for many varied reasons. I have strict requirements I must adhere to when accessing taxi security cameras in the interest of the travelling public's privacy, & I am also subject to yearly audits by the department of transport to ensure that I am following all rules & regulations. This should be enforced across the board for all parties' right to privacy.

At any given time, using our anti-tamper GPS system, I can track & trace every single one of my taxis. I can see where they are, who is logged into the system in the cab, what speed they are travelling at, whether they have the meter for a fare on or off, amongst many other useful things. The fact that I (and Yellow Cabs as our associated booking company) can see all this information in real time, as well as being able to trace back through history, is not only a useful tool in our day to day operations, but incredibly useful for any situation that may arise that could involve the endangerment of drivers or passengers.

This GPS cannot be turned off. Even if a driver is not logged into the system, GPS details are still available & the location of the taxi can still be found in real time. All personalised transport vehicles should have to have the same high standard of GPS as taxis. To supplement these GPS systems, all vehicles should also have emergency systems in place which again are a protection for driver & passenger. Taxis have these in place already & they are effective & efficient. Ride-share drivers & passengers would have a great benefit to their safety if they were required to followed suit.

For many years, the taxi industry has been subject to detailed rules regarding fatigue management for taxi drivers. Both driver & taxi operator have been held liable & responsible for ensuring that taxi

drivers are not driving tired. This is a very important & serious topic for ride-share drivers as well. Ride-share providers are often quoted as saying that drivers are not providing ride-share services as full time work. Many have other jobs that form the basis of their income, ride-share is simply seen as a way to supplement it. There are also many taxi drivers who operate in a similar manner.

If this is the case, & also if drivers are working full-time as a taxi or ride-share driver, then fatigue management needs to be implemented & enforced. If a ride-share driver works another job full time, the increased risk to themselves, passengers & other road users if they are driving for some hours on top of working full time hours elsewhere is enormous. There are simply too many lives at stake to ignore fatigue management.

As the operator of a decent sized fleet, I am able to have 2 standby substitute taxis. Each year the department of transport issues us (via Yellow Cabs Brisbane) permission to operate our standby taxis. Every other year since I came into the industry in 2010, apart from this year, we were also granted peak demand use. At these specified times (such as Christmas, New Year's Eve, Melbourne Cup Day, etc.) we were given permission to run our standby taxis as part of our fleet. For me, this meant I could have 2 extra taxis out working to help with the demand from passengers during times that were considered peak demand. It meant that 2 extra drivers were able to pick up shifts.

This year, we have been given no allowance for peak demand usage. This is obviously due to ride-share now being available, the increased demand on taxis is less during peak times as there are (supposedly, but they do not have to be available) plenty of ride-share vehicles available to pick up the slack. But what it means for me is that I have had to tell 2 drivers that they do not have a shift any more – the best example of this would be Thursday & Fridays. These two days were considered peak demand times for most of the year. Between 6am & 4pm, we could use both of our standby taxis. 2 extra drivers for each of these days could have shifts. Now they have lost that work. It is less money for them & their families, & less for my business.

Since vehicle age restrictions have been lifted, I strongly agree with Taxi Council Queensland's requirement that there needs to be clear vehicle quality & usage rate standards established & that operators should be held responsible for this. The age limits that used to apply to taxis were put in place for the reason that vehicles needed to be safe & road worthy for drivers & passengers. I agree that in some cases older vehicles can still be deemed safe, but there needs to be a clear chain of responsibility to enforce this.

These are just some of the issues that I believe the industry is facing. As previously mentioned, the list of requirements written by Taxi Council Queensland clearly & concisely sum up what is needed to make fair & well informed decisions on new legislation for personalised transport. The Taxi Council Queensland full submission goes into excellent detail with compelling reasoning for their requested requirements. These are common sense measures, not favouring either taxis or ride share, but simply looking after the safety of all drivers, passengers & operators & other road users, whilst sharing the burden of cost to comply with legislation evenly between all modes of personalised transport.

With a fair playing field, I believe that all of us in the taxi industry will have a good chance of being able to continue to make our living in this industry. It would continue to set high standards across the board that the travelling public will be able to depend on. After all, these requirements are coming from what was (and despite the changes to legislation, in most cases still is) a world's best taxi practice – the Queensland Taxi Industry. I urge you to please seriously consider all of these requirements as well as Taxi Council Queensland's full submission & not let our industry fall any

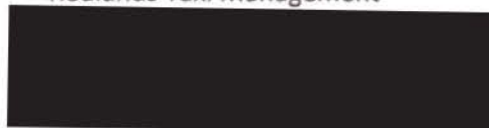
further, but rather rescue it & let us continue to provide the best possible transport to Queenslanders that we can, right across taxis & ride-share.

Failure to take note & implement the requirements listed by Taxi Council Queensland will see our state fall from having one of the best personalised transport industries in the world to an industry with no compliance, no liability, no safety & very unsatisfied customers. Many hard working people have their lives on the line depending on what legislation is implemented. I know I already feel like I have been severely let down by my government, but it is not too late to make things right.

Kind Regards,



Lauren Webber
Managing Director
Redlands Taxi Management



List of Requirements

1. Establish an independent Personalised Transport Commission with legislative amendment, policing/enforcement, regulatory and policy development capacity.
2. Bailment Agreements must be retained, with the minimum work conditions and standards for all personalised transport drivers enshrined in legislation.
3. Security Camera requirements must establish a minimum standard, be consistent and uniform across all personalised transport providers to ensure the safety of all drivers and passengers (regardless of the service chosen) and to meet Queensland Police requirements.
4. Commercial-grade, anti-tamper GPS units must be fixed to all personalised transport vehicles and be remotely accessible to authorised parties.
5. All personalised transport vehicles to have emergency systems in place to support driver safety.
6. The Bill and Regulation must be fully consistent with all other relevant legislation including, but not limited to, disability discrimination and work, health and safety.
7. All personalised transport vehicles be required to have dedicated number plates (akin to "T" plates), rather than easily removable stickers. Plates to be provided only when evidence of appropriate CTP, public liability and certificate of inspection are provided.
8. Immediately define, and establish appropriate and equitable premiums for, the class/classes of Compulsory Third Party insurance for all personalised transport providers to address continued uncertainty.
9. All personalised transport providers must hold public liability insurance to prevent the State Government becoming the default insurer and to minimise potential risks to the community.
10. In the absence of vehicle age restrictions, establish clear vehicle quality and usage rate standards and hold operators accountable.
11. Increase licence fees for Booked Hire Service Drivers and Authorised Entities to help fund expected increases in regulatory and enforcement costs for Government and to better reflect the level of "trust" being placed on licence holders.
12. All drivers must have an ABN and be registered for GST before receiving a Drivers Authorisation.
13. The Government must establish a process for managing the risks of multiple affiliations by drivers in terms of both "chain of responsibility" and fatigue management. This includes drivers operating across both personalised transport and other transport (i.e. truck, bus) sectors.
14. Fully integrate taxis into the GoCard public transport network in the short-term.
15. Clearly define what constitutes a "hail" and "touting".
16. Expressly prohibit the establishment and operation of Booked Hire Service pick up/and drop off zones, on public and private land, which represent pseudo taxi ranks.
17. Establish and maintain a register of drivers that have been disaffiliated or removed from platforms to prevent drivers from simply shifting to a new platform.
18. Establish clear and enforceable requirements for Government access to all data related to the delivery of personalised transport services in Queensland.
19. Expressly identify Police Check requirements in the Bill for all personalised transport drivers as part of Driver Authorization approval.
20. Maintain the capacity of the Minister to enter into Service Contracts at their discretion to ensure the Government has the capacity to respond quickly, and at the lowest cost, to changing or unique circumstances without the need for regulatory or legislative changes.