



Point-to-point transport working group report

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Executive summary

The point-to-point transport sector plays an important role in the provision of public transport services. Point-to-point transport refers to transport that allows customers to travel for a fare, where the route and time of travel are chosen by the customer. This is often provided in a small vehicle (for example, a car or van that carries less than 12 people). There are a range of services that may provide point-to-point transport – including taxis, rideshare, community transport, limousines and hire cars.

People with disability have the right to use accessible and safe point-to-point transport with the same level of service as users without disability. Point-to-point transport provides a flexible, convenient option for people with disability, and is particularly important where alternative forms of public transport are unavailable or are more limited, such as in rural and regional areas and outside of normal operating hours.

In 2019, the Australian Government commenced a reform process¹ to modernise the Disability Standards for Accessible Public Transport 2002² (Transport Standards). Through the reform process, the Government considered options to incorporate rideshare services into the Transport Standards to address issues raised by stakeholders. However, feedback from the disability community, government and industry highlighted a breadth of issues impacting the point-to-point sector as a whole, including both rideshare and the taxi industry. Consequently, a working group was established to consider these issues more holistically and identify opportunities to improve the Transport Standards to deliver safe, inclusive and accessible point-to-point transport services. Further background about the reform process is included in the 'Background' section of this paper.

This report was developed by a working group consisting of representatives from disability representative organisations, industry and government. A full list of members is available at **Appendix A**.

This report presents the findings of the working group. The working group considered:

- What modes of public transport operate in the point-to-point transport sector.
- What language should be used to describe the point-to-point transport sector.
- Whether current requirements in the Transport Standards that apply to taxis are current, relevant, and fit-for-purpose.
- Whether current requirements in the Transport standards that apply to taxis could be applied to the broader point-to-point industry.
- What role community transport plays in the point-to-point transport sector.
- What issues in the point-to-point transport sector could be addressed through staff training, such as refusal of service to people with assistance animals.

For each issue considered, the working group developed opportunities for action for the Australian Government to consider.

A glossary of terms and abbreviations used in this paper is available at **Appendix B**.

Additional issues were also discussed that fall outside of the remit of the Transport Standards and the working group, including state and territory regulations, wheelchair accessible taxi availability and taxi subsidy schemes. These issues are outlined at **Appendix C**.

¹[Reforms of the Disability Standards for Accessible Public Transport 2002](#)

²[Disability Standards for Accessible Public Transport 2002 - Federal Register of Legislation](#)

Opportunities for action

Below is a summary of the opportunities for action identified by the working group and discussed in this report:

- **Rideshare definition** - Updating the regulatory language used in the Transport Standards to resolve the current ambiguity regarding the application of the Transport Standards to rideshare services by explicitly listing rideshare or creating an umbrella term, such as ‘on-demand transport’ to encapsulate both rideshare and taxi services, as appropriate.
- **Definition of wheelchair accessible vehicles (WAVs)** - Update the term “accessible taxi” to be service-agnostic to reflect the modern point-to-point transport landscape.
- **Expand the application of section 2.9 (When an access path not required)** to apply to all taxi and rideshare services to ensure direct assistance to use on-board services or facilities is provided to all passengers’ not just those using wheelchair accessible vehicles.
 - Develop additional guidance to support the application of *section 2.9*. Guidance may include information on the responsibility of drivers to provide assistance and examples of what assistance may look like.
- **Amend section 3.3 (Limited on-board maneuvering)** to remove accessible taxis from these requirements, and introduce a new, separate requirement for operators of taxi and rideshare services to provide assistance to passengers using wheelchairs or mobility aids when they are boarding and alighting. Note – rideshare industry representatives did not support this recommendation.
 - Develop additional guidance to support the application of the new requirement, including guidance on transporting wheelchairs or other mobility aids and the responsibility of drivers to provide assistance.
- **Extend the application of section 9.2 (Use of allocated space for other purposes)** to all wheelchair accessible taxi and rideshare services.
 - Develop guidance noting the benefits of supplying wheelchair accessible vehicles that can accommodate two mobility aids.
- **Extend the application of section 9.3 (Minimum head room) and section 12.5 (vertical height of doorways)** to all wheelchair accessible taxi and rideshare vehicles.
 - Determine who is best placed to conduct further research on the appropriate minimum ceiling and doorway heights in accessible vehicles.
- **Extend the application of section 17.7 (Taxi registration numbers)** to all taxi and rideshare services, or consider amending section 17.7 to include performance-based options to allow passengers to be able to independently verify point-to-point vehicles.
- **Maintain current exemptions for charter boats (including water taxis), limousines and self-driven rental cars** and develop further guidance explaining what services are not considered public transport for the purposes of the Transport Standards.
- **Develop guidance on staff training** for point-to-point transport operators highlighting staff training should be delivered face-to-face where possible and include:
 - Driver obligations under the *Disability Discrimination Act 1992*³ (DDA) in relation to assistance animal users, such as information relating to the National Principles of the Regulation of Assistance Animals⁴ once developed.
 - Information about the different types of mobility aids and how they can be transported.
 - Guidance on how to safely secure wheelchairs in WAVs.

³ [Disability Discrimination Act 1992 \(DDA\)](#)

⁴ [National Principles of the Regulation of Assistance Animals](#)



Background

Legislative context

The Transport Standards apply to all operators and the conveyances they use to provide ‘public transport services’, defined in section 1.23 as ‘an enterprise that conveys members of the public by land, water or air’.

The Transport Standards defines a conveyance:

1.12 Conveyance

(1) A **conveyance** includes any of the following, to the extent that they are used to provide a public transport service:

- (a) aircraft;
- (b) buses or coaches;
- (c) ferries;
- (d) taxis;
- (e) trains, trams, light rail, monorails, rack railways;
- (f) any other rolling stock, vehicle or vessel classified as public transport within its jurisdiction by regulation or administrative action of any Government in Australia.

(2) A **conveyance** does not include the following:

- (a) charter boats (including water taxis);
- (b) limousines (including chauffeured hire cars);
- (c) self-drive rental cars.

There are a range of requirements that apply to taxis and accessible taxis to ensure they meet minimum standards of accessibility for people with disability. These requirements are outlined in **Table 1** in the ‘Review of existing requirements’ section of this report.

Since the commencement of the Transport Standards, new service models have entered the point-to-point transport sector and expanded choice for customers – most notably, rideshare. State and territory governments have made changes to their legislation and guidance to adapt to the changing point-to-point landscape. This includes incorporating rideshare services under their respective point-to-point transport regulatory frameworks and mandating processes, such as training and certification requirements for rideshare drivers. However, the Transport Standards has not been updated to explicitly incorporate new service models such as rideshare.

Reform of the Transport Standards

In 2019, the Australian Government commenced a reform process to modernise the Transport Standards.

Public consultation on the reform options was held in 2021 and 2022. The purpose of public consultation was to learn more about the context in which discrimination is likely to occur for people with disability and gather stakeholder views on the merits of the proposed policy options, associated impacts, costs and benefits, and the extent to which each option would achieve the intended outcome. Reform areas and options were developed by the National Accessible Transport Taskforce, which included representation from the disability community, governments and operators and providers of public transport.

On 20 March 2024, the Government announced the final reform package. The reforms cover a diverse range of issues and aim to improve accessibility across the public transport journey – from journey planning, to navigating infrastructure, safety on board and interaction with public transport staff.

Reforms that are specific to the point-to-point transport industry are outlined at **Appendix D**. A number of reforms also apply to all public transport services, including point-to-point transport, including:

- new staff training requirements to support staff to better meet the needs of people with disability.
- new requirements for public transport operators and providers to communicate information regarding the accessibility features of their services and networks.
- new requirements that information in infrequently requested formats (e.g. large print) must be provided in a timely manner if not immediately available.
- new website accessibility requirements.

The reform process also considered the barriers to accessing rideshare services, how to resolve this ambiguity, and proposed harmonising the requirements for rideshare and taxis. A summary of feedback provided on the rideshare reform area is provided at **Appendix E**. To finalise this reform area and address this feedback, the working group was established and tasked with reviewing issues identified through previous consultation and developing opportunities for action to ensure the Transport Standards reflect the contemporary point-to-point transport sector.

Issues considered by the working group

Rideshare

While taxis are included in the list of conveyances covered by the Transport Standards, there is uncertainty about whether rideshare is a ‘public transport service’ as defined by the Transport Standards. This leads to ambiguity in the obligations of rideshare providers and expectations of customers. People with disability have reported facing discrimination and barriers when accessing rideshare services, such as barriers when using booking and payment services, and the provision of assistance.

Working group members agreed rideshare services should be considered a ‘public transport service’ to which requirements of the Transport Standards apply. Working group members discussed the need for clearly defined terms and to explicitly list rideshare to ensure regulatory certainty in applying the requirements of the Transport Standards to these services.

Including rideshare in the Transport Standards would also provide clarity on the application of the information requirements in Part 27 of the Transport Standards (Information) to rideshare. This includes new requirements that will be introduced as part of the reforms to the Transport Standards, such as the requirement that online formats are not to be the sole means of accessing information. The information requirements outlined in Part 27 apply equally to all public transport services covered under the Transport Standards.

Discussion in the working group demonstrated there is no nationally agreed or consistent definition of point-to-point transport. As public transport is largely regulated by state and territory governments, each jurisdiction has their own legislation with different terminology. For example, in NSW, rideshare vehicles (such as Uber and Didi) and taxis are defined separately, however, both are considered to be point-to-point services. In comparison, in Victoria these services are defined as booked and unbooked commercial passenger vehicles.

Legislation and guidance need consistent terminology to be effective. Working group members noted that given different terminology is used across jurisdictions, it may be appropriate to include and define a high-level 'umbrella' term in the Transport Standards that describes the sector as a whole. One working group member noted the Federal Court considered the word 'taxi' to be sufficiently broad in its ordinary meaning to include UberX services in *Uber B.V. v Commissioner of Taxation* (2017) FCA 110⁵. As such, this member considered the term 'taxi' to sufficiently incorporate rideshare services and suggested a new 'umbrella' term does not need to be introduced to the Transport Standards. However, the majority of working group members agreed further clarity is needed in the Transport Standards.

People with disability and their advocates highlighted the importance of centring the user experience when selecting terminology and drafting definitions. The main forms of public transport covered by the point-to-point transport sector are taxis and rideshare. Both taxi and rideshare services are requested as-needed by the user. As such, members suggested the term 'on-demand transport' encapsulates this experience and can be understood by users, as well as operators and providers of these services.

Some jurisdictions use the term 'on-demand transport' in other contexts. For example, in NSW 'on-demand' is a term used in multiple contexts, including Car Sharing Schemes (e.g. GoGet which is exempt from the Transport Standards) and on-demand bus services. However, members broadly agreed this term appropriately focuses on the user experience and would be a suitable definition to adopt for the purpose of capturing relevant services and conveyances under the Transport Standards. Working group members noted there may be scenarios where requirements are specific to one conveyance type within the point-to-point or 'on demand' transport sector. To allow for flexibility and to ensure the requirements of the Transport Standards can be appropriately applied, the Transport Standards can be drafted to allow specific conveyances to be excluded from requirements where appropriate. Any new term introduced to the Transport Standards would be clearly defined in consultation with industry and legislative drafters to ensure there are no unintended consequences. Jurisdictions would be able to continue using their current terminology in their legislation.

Working group members also noted consideration should be given to updating the term "accessible taxi", used in application tables in the Transport Standards, to be a service-agnostic term such as "accessible vehicle". This would ensure the requirements that apply to accessible taxis would also apply to a potential future fleet of wheelchair accessible rideshare vehicles.

Opportunity for action

- Consider updating the regulatory language used in the Transport Standards to resolve the current ambiguity regarding the application of the Transport Standards to rideshare services, by explicitly listing rideshare or creating an umbrella term, such as 'on-demand transport' to encapsulate both rideshare and taxi services, as appropriate. For example, "On-demand transport: a vehicle available for hire which transports a passenger at their discretion to a destination of their choice, for a fare. For example, taxis and rideshare."

⁵ https://www.ato.gov.au/law/view/pdf/misc-case/rdr_2017fca110.pdf

- Consider updating the term “accessible taxi” to be service-agnostic to reflect the modern point-to-point transport landscape.

Review of existing requirements in the Transport Standards

The Transport Standards include a range of requirements specific to taxis and accessible taxis. These are outlined in Table 1 below. In addition to these requirements, there are also a broad range of requirements in Part 27 of the Transport Standards (Information) that relate to the provision of information. These requirements apply equally to all public transport services covered by the Transport Standards, including taxi services. If the Transport Standards are amended to resolve the uncertainty regarding the application to rideshare services, these requirements would also apply accordingly.

Members discussed whether the current Transport Standards requirements for taxis are still fit for purpose, possible improvements, and whether these requirements should apply to rideshare services. During these discussions, a range of issues that are outside the scope of what can be addressed through the Transport Standards were also raised. These are outlined in **Appendix C**.

Table 1: Current Transport Standards requirements that apply to taxis and accessible taxis

Transport Standards section	Requirement	Conveyance
2.9 When is an access path not required	<ol style="list-style-type: none"> 1. An access path need not extend inside the entrance of a conveyance. 2. If there is no access path inside the entrance of a conveyance, the operator must provide on-board wheelchairs or direct assistance to passengers to use on-board facilities or services. 	<ul style="list-style-type: none"> • Accessible taxis • Coaches • Aircraft
3.3 Limited on-board manoeuvring	<p>If the design restrictions of a conveyance limit on-board manoeuvring areas for wheelchairs and similar mobility aids, the operator of the conveyance must ensure equivalent access by direct assistance to passengers.</p> <p><i>Note</i> See sections 33.3 to 33.6 in relation to equivalent access and direct assistance.</p>	<ul style="list-style-type: none"> • Accessible taxis • Coaches • Aircraft except small aircraft
9.2 Minimum number of allocated spaces to be provided	<p>At least one allocated space must be provided in each conveyance (AS1428.2 (1992) Clause 6.1).</p>	<ul style="list-style-type: none"> • Accessible taxis
9.3 Minimum head room	<ol style="list-style-type: none"> 1. The minimum head room in an allocated space is 1410 mm. <i>Note</i> See section 12.5 in relation to minimum doorway opening. 2. For a conveyance entering service on or after 1 January 2013, the minimum headroom is 1500 mm. 	<ul style="list-style-type: none"> • Accessible taxis

Transport Standards section	Requirement	Conveyance
9.9 Use of allocated space for other purposes	Allocated space may be used for other purposes if it is not required for use by a passenger in a wheelchair or similar mobility aid.	<ul style="list-style-type: none"> • Buses except dedicated school buses • Ferries • Accessible taxis • Trains • Trams • Light rail
12.5 Vertical height of doorways	<ol style="list-style-type: none"> 1. Doorways must have an unobstructed vertical height of at least 1400 mm. <i>Note</i> See section 9.3 in relation to internal headroom. 2. For a conveyance entering service on or after 1 January 2013, the minimum unobstructed doorway height must be 1500 mm. 	<ul style="list-style-type: none"> • Accessible taxis
17.7 Taxi registration numbers	Raised taxi registration numbers must be placed on the exterior of passenger doors forward of the handle.	<ul style="list-style-type: none"> • Taxis
Schedule 1.3	<p>Responsibility</p> <ul style="list-style-type: none"> • Radio networks • Co-operatives <p>Requirement</p> <ul style="list-style-type: none"> • Response times for accessible vehicles are to be the same as for other taxis. 	<ul style="list-style-type: none"> • Taxis • Dial-a-ride services

Expanding the application of *section 2.9 (When an access path is not required)* to all taxi and rideshare services

The intent of section 2.9 is for operators to provide assistance to passengers to use on-board services or facilities when design or space constraints do not allow for a suitable access path. For example, this may include assisting taxi passengers to access payment systems by bringing the payment device to them.

Currently Section 2.9 only applies to accessible taxis, coaches and aircraft. As this does not apply to all regular taxi and rideshare services, people with disability report experiences of drivers not assisting them to access facilities when on board. This can make safely paying for a taxi service difficult for passengers with limited mobility.

Working group members recommended expanding the application of section 2.9 to ensure drivers provide onboard assistance to passengers on all taxi and rideshare services. Members also recommended developing guidance for drivers which outlines their responsibilities under section 2.9 and examples of what this looks like in practice.

Opportunity for action

- Extend the application of section 2.9 to apply to all taxi and rideshare services to ensure direct assistance to use on-board services or facilities is provided to all passengers.

- Develop additional guidance to support the application of section 2.9. Guidance may include information on the responsibility of drivers to provide assistance and examples of what assistance may look like.

Amending section 3.3 (limited on-board manoeuvring) and creating a new section to require all taxi and rideshare drivers to provide direct assistance

Section 3.3 requires the operator of a conveyance to assist people who use wheelchairs and similar mobility aids if the design of the conveyance limits the person's ability to manoeuvre their device when on-board. The requirement applies to wheelchair accessible taxis (WATs), coaches and aircraft (except small aircraft). Members considered whether the intent of section 3.3 is clear when applied to point-to-point transport services.

Working group members noted there are significant differences in design between taxi and rideshare conveyances and the larger conveyances covered by section 3.3 (coaches and aircraft). This makes the requirement confusing when applied to taxi and rideshare services. Working group members suggested the intent of this requirement, as it relates to taxi and rideshare services, is that operators would be required to provide direct assistance to passengers with wheelchairs and similar mobility aids when they are boarding and alighting. Following this discussion, members recommended introducing separate requirements for taxi and rideshare operators to assist with boarding and alighting. Members suggested this will better capture the context and intent of the requirement for these smaller conveyances used by taxi and rideshare services.

Rideshare industry representatives raised concerns about the feasibility of rideshare vehicles transporting mobility devices and their ability to safely provide direct assistance when needed. Concerns included rideshare vehicles not being large enough to fit a mobility aid, drivers not being physically able to lift a mobility aid and a lack of safe pick up and drop off locations. The United Kingdom's *Equality Act 2010* provides an example of how some of these concerns may be addressed. The *Equality Act 2010*⁶ requires point-to-point transport drivers to provide "reasonable assistance to any wheelchair user". This includes carrying mobility devices where possible. However, drivers can be exempt from this requirement if it is not possible for the mobility aid to be carried safely in the vehicle or if they have a medical reason not to comply. If this opportunity for action is progressed, similar provisions could be considered through the regulatory impact analysis and legislative drafting processes. **Appendix C** outlines further discussion on concerns raised that fall outside the remit of the Transport Standards.

The working group discussed instances where mobility aid users have reported drivers not assisting or allowing them to use their service, as the drivers are not aware many mobility aids can be folded to fit in a smaller car or may not want to provide assistance. The majority of working group members recommended amending section 3.3 to remove wheelchair accessible taxis, and introducing a new separate requirement for all operators of taxi and rideshare services to provide assistance to passengers using wheelchairs and similar mobility aids when they are boarding and alighting. Rideshare industry representatives did not support this recommendation, noting the previously discussed concerns regarding the feasibility of transporting mobility devices.

Members also recommended developing guidance to explain the different types of mobility aids and how they can be transported. Members suggested this could be included in the mandatory training to be rolled out through the reforms to the Transport Standards. These discussions are outlined in the 'Opportunities to improve staff training' section of this report.

⁶ [Equality Act 2010 \(UK\)](#)

Opportunity for action

- Amend the application of section 3.3 to remove wheelchair accessible taxis from these requirements.
- Introduce a new separate requirement for all operators of taxi and rideshare services to provide assistance to passengers using wheelchairs and similar mobility aids when they are boarding and alighting. Note – rideshare industry representatives did not support this recommendation.
- Develop additional guidance to support the application of section 3.3, including on transporting wheelchairs or other mobility aids and the responsibility of drivers to provide assistance.

Maintaining *section 9.2 (Minimum number of allocated spaces to be provided)*

Section 9.2 provides that accessible taxis must have a minimum of one allocated space. Working group members noted more than one mobility aid user may want to travel to the same place at the same time, and it is preferable for accessible taxis to be able to accommodate two mobility aids.

Many accessible taxis can already accommodate two mobility aids. However, the large variety and increasing wheelchair size and weight may make requiring all vehicles to accommodate two mobility aids unfeasible. Working members also highlighted the potential for perverse outcomes, where changes in requirements may negatively impact wheelchair accessible taxi availability.

Rideshare industry representatives in the working group noted there are currently no wheelchair accessible vehicles in their organisations' fleet, and as such, any changes to the requirements in section 9.2 would not impact their services. One rideshare representative discussed how their organisation trialed a fleet of wheelchair accessible vehicles, however, rideshare drivers noted it would be expensive to buy and maintain the vehicles.

Members agreed to maintain the current requirement, and recommended guidance be developed noting the benefits of supplying wheelchair accessible vehicles that are able to accommodate two mobility aids.

Opportunity for action

- Extend the application of section 9.2 to all wheelchair accessible taxi and rideshare services.
- Develop guidance, noting the benefits of supplying wheelchair accessible vehicles that can accommodate two mobility aids.

Conduct further research on doorway and ceiling height of conveyances requirements in *section 9.3 (Minimum head room) and section 12.5 (vertical height of doorways)*

Section 9.3 requires the minimum head room in an allocated space to be 1410mm, or 1500mm for conveyances entering service on or after 1 January 2013. Section 12.5 requires the doorways of conveyances entering service on or after 1 January 2013 to be at least 1500mm tall. Conveyances that entered service before 1 January 2013 must have doorways at least 1400mm tall.

Some working group members suggested amending these requirements to allow accessible vehicle models used overseas to be used in Australia. However, working group members also noted these are technical requirements impacted by a number of factors, such as mobility aid sizes. Members suggested additional research by an appropriately qualified entity should be conducted on appropriate ceiling and doorway height before considering whether these requirements are still suitable and should be applied to rideshare.

Working group members also noted that introducing new vehicle requirements without appropriate research and impact analysis could have adverse outcomes on accessible vehicle availability. Members noted any requirements that increase the cost of purchasing and maintaining an accessible vehicle may reduce the number of wheelchair accessible vehicles available.

In 2014, Austroads commenced a project focused on Motorised Mobility Devices (MMDs). Through this project, jurisdictions agreed to Standards Australia drafting construction and performance standards for motorised mobility devices for use on public infrastructure, such as footpaths and public transport. Standards Australia developed a Technical Specification for MMDs in collaboration with the jurisdictions. In 2019, Austroads published a discussion paper⁷ seeking feedback on adopting the Technical Specification. Following extensive consultation, the project closed and the Technical Specification was not adopted. This consultation highlighted the interdependencies in this space, such as conveyance design, therapeutic goods regulation and road safety, foregrounding the need for extensive research and consultation when introducing requirements for the maximum size of mobility aids.

Opportunity for action

- Extend the application of section 9.3 and section 12.5 to all wheelchair accessible taxi and rideshare vehicles.
- Determine who is best placed to conduct further research on the appropriate minimum ceiling and doorway heights in wheelchair accessible vehicles.

Extending the application of *section 9.9 (Use of allocated spaces for other purposes)*

Section 9.9 allows an allocated space to be used for other purposes if it is not required for use by a passenger in a wheelchair or similar mobility aid. The working group agreed this requirement should be maintained and applied to all taxi and rideshare services.

Opportunity for action

- Extend the application of section 9.9 to all wheelchair accessible taxi and rideshare services.

Extending the application of *section 17.7 (Taxi registration numbers)*

Section 17.7 requires raised taxi registration numbers to be placed on the exterior of passenger doors forward of the handle. The intent of this requirement is to ensure people with vision impairment can verify they are entering the correct vehicle in an equivalent way to people without vision impairment who are able to verify vehicles by viewing the number plate. The working group discussed expanding this requirement to apply to rideshare services.

Rideshare representatives stated the differences between the taxi and rideshare industries would make complying with section 17.7 difficult. They stated that taxi vehicles are generally dedicated vehicles used for providing taxi services bailed through a bailor agreement, and as such, taxi vehicles generally have permanent internal and external branding making the addition of a braille sticker a comparatively small burden. In

⁷ <https://austroads.gov.au/projects/project?id=SRL6218>

contrast, they stated rideshare vehicles are generally not used exclusively for rideshare services, and are not branded to the same extent. Rideshare representatives also noted that rideshare drivers use their own personal car, and drivers may not wish to be identified as a rideshare car in day-to-day use.

Rideshare industry representatives suggested the existing requirement for taxis to have a raised registration number should remain in place to support rank and hail trips. For rideshare and other booked point-to-point transport services, they suggested operators should be responsible for providing an accessible and effective means of vehicle identification that reflects their service model, such as app-based features, audio cues or other performance-based technological solutions.

Noting the concerns raised by the rideshare industry representatives, some members suggested other solutions could be used, such as PIN identification through rideshare mobile applications and magnetic removable raised registration numbers. However, there were divergent views amongst working group members regarding the suitability of these alternative solutions. Some members noted issues with physical signage such as removeable raised numbers, noting it can be damaged, removed, incorrectly placed, or defaced, reducing reliability and effectiveness. Other members noted the importance of maintaining requirements for a physical way to identify a vehicle without having to rely on mobile devices. Some people with vision impairment shared stories of the embarrassment and fear they feel when they accidentally enter the wrong vehicle while using a rideshare service, and highlighted how a raised registration number would prevent these situations. Members also noted some passengers may have difficulty using technology or may not have access to a mobile phone as it may run out of charge or a family member may have ordered the rideshare service for them. Members highlighted in these cases, it is important a level of comfort, dignity and safety for people with vision impairments is maintained. Members also noted that operators and providers will also have a responsibility under the updated Transport Standards to ensure online information is not the sole means of providing information⁸.

In recognition of the importance of passengers with vision impairment having the ability to independently verify point-to-point vehicles to travel safely and independently, the majority of the working group recommended expanding section 17.7 to apply to rideshare services. Rideshare industry representatives did not support this recommendation, noting the previously discussed concerns that the rideshare industry cannot accommodate raised number plates as a form of vehicle identification. Rideshare industry members instead suggested consideration could be given to amending section 17.7 to be a performance-based standard for rideshare operators. This would allow solutions other than a physical sticker to be implemented, such as audio cues, if the solution is developed with people with vision impairment and ensures equivalent levels of safety and independence. Some working group members representing people with vision impairment supported this option, however, other working group members representing the same group considered physical ways to independently verify vehicles remain important. Some working group members also suggested section 17.7 could be amended to be performance based for taxis. However, other working members noted this may reduce accessibility for people with vision impairments.

Members also noted that expanding the requirement to rideshare services would require updating language in the requirement to replace the reference to “taxi registration numbers” with “registration numbers”.

Opportunities for action

- Consider extending the application of section 17.7 to all taxi and rideshare services, or consider amending section 17.7 to include performance-based options to allow passengers to be able to independently verify point-to-point transport vehicles.
- Any alternative verification methods would need to ensure consistency and predictability between modes of point-to-point transport and must be accessible and safe for people with different

⁸ https://www.infrastructure.gov.au/sites/default/files/documents/reform-of-the-disability-standards-for-accessible-public-transport-2002-summary-of-decision-march2024_0.pdf

disabilities. Solutions would be developed by rideshare platform providers and taxi companies in consultation with people with disability.

Note – While rideshare industry members indicated they may support independent verification of point-to-point transport vehicles for people with disability, including people with vision impairment, they do not support extending the requirement for raised registration numbers.

Consider wheelchair accessible taxi response time requirements in the future

Schedule 1, section 1.3 of the Transport Standards requires response times for accessible taxis to be the same as for other taxis. Radio networks and co-operatives are responsible for this requirement. The intent of this requirement is for people who require accessible taxis to receive the same standard of service as other passengers. Working group members highlighted “radio networks” and “co-operatives” are outdated terms. Working group members outlined that issues with accessible availability and reliability, outlined further in **Appendix C**, makes complying with this requirement potentially unfeasible. Despite this, some working group members recommended maintaining the requirement, as they believe it still can lift the standard of service provided. Other working group members suggested removing the requirement and instead focusing on improving the availability of accessible taxis.

Removing this requirement may not be in the best interest of people who use accessible taxis. In recognition of the number of factors impacting the ability of operators and providers to meet this requirement, the working group recommended the issue be considered and consulted on further through the next statutory review of the Transport Standards.

Exemptions for charter boats, limousines and self-drive hire cars

The Transport Standards currently exempt charter boats (including water taxis), limousines and self-driven hire cars. However, some jurisdictions consider these modes of transport to be point-to-point transport, and regulate them alongside taxis and rideshare.

Charter boats (including water taxis)

Working group members discussed the costs and benefits associated with including charter boats in the Transport Standards. Members noted some locations, such as residential islands in Sydney, are reliant on water transport and would benefit from accessible charter boats and water taxis. However, concerns were raised about the cost and viability of upgrading associated infrastructure to facilitate the use of accessible charter boats, such as local jetties in locations with challenging topographic conditions.

Working group members recommended maintaining the current exemption for charter boats (including water taxis), and noted the issue should be monitored through the 2027 statutory review of the Transport Standards.

Limousines

Working group members noted limousines are generally used for special events and not to access essential services. Members agreed limousines would not generally be considered a public transport service.

Members suggested further clarification on the distinction between public transport point-to-point services (e.g. rideshare and taxis) and special event point-to-point services (e.g. limousines and luxury charter vehicles) is needed. The majority of jurisdictions class limousines as point-to-point transport in their own transport system.

Working group members recommended maintaining the exemption for limousines and suggested additional guidance be developed to clarify limousines and other charter cars that are not classed as public transport under the Transport Standards.

Self-driven rental cars

Members agreed that self-driven rental cars are not a public transport service, and are better characterised as a form of private transport. Members recommended maintaining the exemption for self-driven rental cars.

Opportunity for action

Maintain the current exemptions for charter boats (including water taxis), limousines and self-driven rental cars, and develop further guidance explaining what services are not considered public transport for the purposes of the Transport Standards.

Community transport

Community transport is a transport service for people who cannot access other modes of public transport, often provided by community and support organisations. Division 1, section 1.23 of the Transport Standards states that community transport is subject to the Transport Standards when it is funded or subsidised by charity or public money, and provides services to the public.

Community transport industry representatives in the working group noted complying with the current and updated Transport Standards requirements is not burdensome and suggested no changes.

Opportunities to improve staff training

The reforms to the Transport Standards will require staff training to be rolled out within five years of the updated Transport Standards coming into effect. Further guidance will be provided through the Transport Standards and the accompanying Guidelines. Training should be tailored to meet the specific roles and responsibilities of staff. 'Staff' refers to all individuals engaged in providing a public transport service, including independent contractors.

The working group identified a range of issues experienced by people with disability when using taxi and rideshare services that could be addressed through staff training.

Assistance animals

The DDA provides that unlawful discrimination includes treating a person with a disability less favourably because they are accompanied by an assistance animal. Despite this, people with disability frequently experience operators of taxi and rideshare services refusing to provide services to them if they are travelling with an assistance animal.

Taxi and rideshare industry working group members noted drivers must complete mandatory training on accepting assistance animals before joining the rideshare platform or taxi network. Some jurisdictions also mandate training as a condition of registration as a commercial driver. The content of training and requirements to refresh training periodically are inconsistent and representatives of people with disability on the working group also flagged this training may not be effective, as refusals continue to happen despite the training being completed.

A rideshare industry representative noted a new policy has been introduced which requires rideshare drivers to refresh their assistance animal training if the driver is reported for declining an assistance animal user. If the driver declines an assistance animal user a second time, the driver risks losing access to the platform.

Working group members agreed drivers need to be educated on their obligations under the DDA and the rights of assistance animal users. Some drivers may not have met an assistance animal before and are therefore unsure how it will act. Working group members suggested face-to-face training should be mandatory so drivers can meet assistance animals and understand they are safe and clean. Guidance may also include information relating to the National Principles of the Regulation of Assistance Animals, once developed. The National Principles will lighten the burden on assistance animal users and reduce confusion for the businesses and services that they access. It will make it easier to understand when an assistance animal meets public access requirements. It will also make it easier for individuals to travel with confidence knowing that their assistance animal will be recognised. This work is being led by the Commonwealth Department of Health, Disability and Ageing.

Opportunity for action

Guidance on staff training for taxi and rideshare operators should highlight the need for training about driver obligations under the DDA in relation to assistance animal users. Guidance may include information relating to the National Principles of the Regulation of Assistance Animals, once developed.

Staff training for taxi and rideshare operators should be delivered face-to-face and include interaction with an assistance animal where possible.

Mobility aids

Working group members discussed the need for staff training to include information about the different types of mobility aids and how they can be transported. Working group members highlighted that better staff training may improve the accessibility and availability of taxi and rideshare services for people with disability if drivers are aware that transport of devices is not limited to wheelchair accessible vehicles, and that some mobility aids can be folded and transported in sedans.

Disability representative organisation members also noted mobility aid training would be more beneficial if delivered face-to-face, so drivers can learn how to fold and store different mobility aids confidently. However, rideshare industry and taxi industry representatives suggested staff training requirements should be flexible to enable training to be delivered via digital platforms. Rideshare industry representatives also noted the decentralised nature of their workforce, high driver turnover and large geographic spread, may make it difficult to roll out face-to-face training.

Working group members also discussed the need to improve guidance on how to safely lift and secure wheelchairs into wheelchair accessible vehicles.

Opportunity for action

Guidance on staff training for rideshare and taxi operators should include:

- information about the different types of mobility aids and how they can be transported
- guidance on how to safely lift and secure wheelchairs in wheelchair accessible vehicles.

Staff training for taxi and rideshare operators should be delivered in person where possible, and should include practical components regarding how to safely transport and secure mobility aids.

Next steps

The working group secretariat will present this report to the National Accessible Transport Steering Committee for endorsement. The Steering Committee oversees the working group. The Steering Committee is comprised of officials from the Australian Government (Chair), state and territory governments and the Australian Human Rights Commission.

Once finalised, the Australian Government will consider the opportunities for action identified by the working group to improve the accessibility of point-to-point transport in Australia. These may be implemented through updates to the Transport Standards, additional guidance for operators and providers, and bringing issues to the attention of policy makers. Where the working group has recommended additional guidance, work will commence to update the Whole Journey Guide, the Transport Standards Guidelines or other relevant publications.

Where the working group has discussed issues outside the scope of the working group or what can be addressed through the Transport Standards, the Australian Government will present this report to relevant responsible entities to consider the findings and recommendations.

Impact analysis process

If the Australian Government decides to progress an opportunity for action that is likely to have a regulatory change, an impact analysis process will need to be undertaken. This includes a cost-benefit analysis and requires that business, community organisations and individuals have the opportunity to provide detailed input about the impact of any proposed amendments.

The Australian Government regulatory impact analysis process includes [seven impact analysis questions](#) for policy makers to consider. The considerations of the working group outlined in this report begin to address the first two questions. If a regulatory change is considered, these seven questions will be considered in more detail through the impact analysis process. The seven impact analysis questions are:

1. What is the policy problem you are trying to solve and what data is available?
2. What are the objectives, why is government intervention needed to achieve them, and how will success be measured?
3. What policy options are you considering?
4. What is the likely net benefit of each option?
5. Who did you consult and how did you incorporate their feedback?
6. What is the best option from those you have considered and how will it be implemented?
7. How will you evaluate your chosen option against the success metrics?

For more information on the Australian Government impact analysis process, visit the Office of Impact Analysis website at <https://oia.pmc.gov.au/>

Appendix A – Working group members

Working group membership included:

- Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (Chair)
- Australian Human Rights Commission
- Attorney-General's Department
- Blind Citizens Australia
- Council for Intellectual Disability
- National Ethnic Disabilities Alliance
- People with Disability Australia
- Physical Disability Council of NSW
- Vision Australia
- Guide Dogs Australia
- Australian Taxi Industry Association
- Bus Industry Confederation
- Uber
- Didi
- Department of Transport and Main Roads, Queensland
- Transport for New South Wales
- Department of Transport and Planning, Victoria
- Department of Infrastructure and Transport, South Australia
- Department of State Growth, Tasmania
- Department of Transport, Western Australia
- Department of Logistics and Infrastructure, Northern Territory.

Appendix B – Glossary of terms and abbreviations used in this paper

Public transport service – As outlined in section 1.23 of the Transport Standards, a public transport service is an enterprise that conveys members of the public by land, water or air. A public transport service includes community transport conveyances that are funded or subsidised by charity or public money and that offer services to the public; and foreign aircraft and vessels that carry passengers to, from or in Australia and that offer services to the public.

A public transport service does not include a service that provides adventure travel (for example, white water rafting, ballooning or amusement park rides), except to the extent that the service operates to move the public from one location to another distant location.

Point-to-point transport - Point to point transport is any passenger service in a vehicle (other than a bus) that can take customers on a customised route as defined by them, at a time they choose, for a fare⁹. Point-to-point transport includes taxis, rideshare, limousines, community transport and other hire cars.

Rideshare - A rideshare service is a point-to-point transport service which is booked through rideshare company's mobile application, website or by phone call. Fares are demand driven and paid before the ride commences. Rideshare drivers usually own their vehicle and have branding which identifies them as a rideshare vehicle.

Taxi - A taxi service is a point-to-point passenger service which can be booked or hailed on the street or hired from a rank by customers. Taxis charge customers using a meter or a fixed fare after the completion of the trip. Taxis typically are required to be identifiable by livery (signage and hail light) which often identifies their affiliation with a taxi network.

Transport Standards - Disability Standards for Accessible Public Transport 2002 (Commonwealth).

WAV (Wheelchair Accessible Vehicle) - A wheelchair accessible vehicle (WAV) is a passenger car or van that is suitably modified to safely transport a person in their wheelchair.

Whole Journey Guide - *The Whole Journey Guide: A guide for thinking beyond compliance to create accessible public transport journeys* was developed by the Department of Infrastructure, Transport, Regional Development, Communication, Sports and the Arts.

⁹ <https://www.pointtopoint.nsw.gov.au/about-commissioner/what-point-to-point-transport>

Appendix C – Opportunities to improve the accessibility and safety of point-to-point transport outside the scope of the Transport Standards

Working group members highlighted a number of issues that were not within scope of what can be addressed through the Transport Standards. However, as these issues are important for improving the experience of people with disability using point-to-point transport, they have been captured in this section of the report. The Australian Government will present this report to relevant responsible entities to consider these findings.

Access to taxi loading zones and similar pick up and drop off infrastructure

The working group discussed how state and local government regulation impacts the ability of some point-to-point service providers to provide a safe and accessible service and may impact the ability for operators to comply with requirements of the Transport Standards.

Rideshare operators highlighted that they do not have the same access to some areas to legally stop and park as taxi drivers, particularly in cities. This impacts their ability to safely pick up and drop off passengers, including people with disability, and may impact a driver's ability to provide direct assistance when needed. Working group members discussed instances of rideshare drivers being fined for parking in taxi ranks and other safe parking spots, and highlighted the impact this has on their willingness and ability to provide an accessible service.

The taxi industry raised concerns there are not enough taxi spaces to support rideshare drivers and taxi drivers and that off-duty rideshare drivers may use taxi spaces when not providing a public transport service.

Working group members suggested this issue be raised with jurisdictional representatives on the Steering Committee.

Availability and reliability of Wheelchair Accessible Taxis

The working group agreed there were ongoing challenges with the availability and reliability of wheelchair accessible taxis (WATs). Industry representatives reported challenges with meeting demand, especially in outer suburban, regional and rural areas. Disability representative organisations reported poor quality service, long wait times and instances of discrimination when accessing WAT services.

Across jurisdictions, there are a range of incentives in place to encourage operators to provide WAT services. This includes lifting fees, bonuses to drive in off-peak times, incentives to work extended hours on public holidays or during major events, and additional lifting fees for operating at night time. There are also a range of incentives in place to encourage new WAT services to enter or remain in service, including grants and interest-free loans to assist operators and providers to procure or modify their vehicles, extensions to the age of vehicle permitted to operate WAT services and fee-free taxi licenses.

Other jurisdictions internationally are also grappling with WAT availability and reliability issues, and are trialing different initiatives to improve the situation. For example, New York City introduced their [Green Rides Initiative](#) in November 2023, which aims to increase the number of zero emission vehicles and wheelchair accessible vehicles (WAVs) in the high-volume for-hire fleets. This initiative has not been in place long enough to determine its effectiveness.

Taxi subsidies

Taxi subsidies play an important role in supporting people with disability to access the community. Feedback has highlighted issues such as incompatibility across jurisdictions and an inability to use subsidies for services other than taxis.

All jurisdictions in Australia issue subsidy vouchers to be used by people with disability when travelling interstate. However, there is generally a need to request these vouchers ahead of planning to travel interstate and wait times vary. People with disability have reported drivers refusing interstate taxi vouchers, as they do not know how to process them and have concerns about the time taken to be remunerated. Taxi industry representatives explained drivers may reject vouchers they are not familiar with, as an invalid voucher would result in them not being paid for a trip. To address this, members recommended including information on accepting interstate subsidy vouchers in staff training.

Some working group members recommended extending taxi subsidy schemes to rideshare services. Currently only Victoria¹⁰ and the Northern Territory¹¹ have expanded their subsidy schemes to other on-demand transport service providers.

¹⁰ <https://safetransport.vic.gov.au/on-the-road/multi-purpose-taxi-program/mptp-members/>

¹¹ https://nt.gov.au/__data/assets/pdf_file/0006/236625/ibcpv21-nt-taxi-subsidy-and-lift-incentive-schemes.pdf

Appendix D – List of reforms to the Transport Standards that affect point-to-point transport

Staff training (Regulatory, existing and new assets – 5 year set timeframe)

- Requirements to conduct disability awareness training to meet the specific roles and responsibilities of staff.

Information and communication reforms (Regulatory, new and substantially refurbished/ upgraded assets)

- Requirement for websites that provide information on public transport services to comply with WCAG Level 2.1 AA.
- Requirement for all information provided by an operator or provider on a mobile web system to meet WCAG 2.1 AA requirements as a minimum.
- Requirements regarding print size, format and contrast for documents.
- Require that all information provided by an operator or provider must meet minimum technical (WCAG) specifications.

Information and communication reforms (Regulatory, existing and new assets – 5 year set timeframe)

- Requirement that online information is not the sole means of providing information.
- Requirements to define accessibility terminology used by the operator and communicate accessibility features of public transport premises and vehicles.
- Requirements that information in infrequently requested formats (e.g. large print) must be provided in a timely manner if not immediately available.
- Requirements for the standard of braille to be used on printed formats.

Assets (Regulatory, existing and new assets – 10 year set timeframe)

- Requirements for the first and last vehicle spaces in a taxi rank to be accessible and connected to access paths.
- Requirements for the first and last vehicle spaces in on-street passenger loading zones to be accessible and for tactile ground surface indicators and kerb ramps.

Assets (On commencement)

- Requirements for the boarding points used by operators of hail-and-ride services. Consultation demonstrated the update may result in operators being able to offer their service to a greater customer base. The update clarifies the following requirements apply to hail-and-ride services:
 - Passengers must be able to hail the service at accessible hail-and-ride boarding points where boarding devices can be deployed.
 - Accessible boarding points must offer equal access to public transport services.

Further work (Status quo, working groups)

- Develop guidance to encourage operators and providers to develop and publish plans on how they are meeting, and progressing towards compliance with the Transport Standards.
- A holistic review of the point-to-point transport, including rideshare, industry to determine the scope of the problem.

Appendix E – Summary of feedback on rideshare reform area

The National Accessible Transport Taskforce (Taskforce) identified that people with disability face discrimination and barriers when accessing rideshare services. The Taskforce also noted a lack of certainty regarding the requirements that apply to rideshare operators and providers under the Transport Standards as an issue.

Feedback from the disability community, government and industry received during public consultation in 2022 highlighted the breadth of issues in the point-to-point transport sector, including taxi and rideshare services. Issues highlighted included a lack of clarity on the application of the Transport Standards to rideshare, the availability of wheelchair accessible taxis, and inadequate staff training. Feedback also highlighted that the point-to-point transport sector has grown and evolved significantly since the commencement of the Transport Standards. For this reason, some stakeholders raised concerns that the differences in the rideshare and taxi business models means that the proposal to apply identical requirements to both service types could be problematic and or potentially unfeasible.

Below is a summary of key feedback received in 2021 and 2022 through public consultations in response to the Consultation Regulation Impact Statements for the reform of the Transport Standards. These findings formed the foundation of the working group's project plan.

Disability stakeholders supported regulation that resolves uncertainty about the obligations of rideshare providers. Consultation findings demonstrated a lack of certainty for disability stakeholders of the requirements for rideshare operators and providers under the Transport Standards. All feedback from individuals, people with disability and disability organisations supported the regulatory option on the grounds that regulation resolves the uncertainty about the requirements for rideshare providers, and will address some barriers to using rideshare.

A holistic review of the point to point transport industry is needed. Multiple state and territory government submissions indicated the proposed regulatory option underestimated the complex policy and legal environment that rideshare operates in, and may have unintended impacts on the point-to-point transport industry. It was suggested that a holistic review of the point-to-point transport industry, including rideshare and taxis, should be undertaken to ensure that the Transport Standards are still fit-for-purpose.

It is not appropriate to directly transfer current taxi requirements to the rideshare industry. Feedback highlighted that the point-to-point transport industry has evolved significantly since commencement of the Transport Standards, and that the differences between the rideshare and taxi industries makes applying the same requirements to both problematic and potentially unfeasible. As such, it may not be appropriate to directly transfer current taxi industry requirements within the Transport Standards to the rideshare industry without further consideration.

More engagement with industry is needed. Limited feedback was provided by the rideshare industry during the development and consultation phase of the reforms. As such, the preferred option presented in the Decision Regulation Impact Statement (RIS) for the reforms does not account for all potential impacts on the rideshare industry.