

## Comments on Draft of the Review of Disability Standards for Accessible Transport

These comments are based around Recommendation 7

*APTJC develop a mandatory reporting framework for Commonwealth, State and Territory governments and implement the framework by end of 2008.*

The original submissions I made to the Review were mainly based around wheelchair accessible taxis these comments will stay with that area.

The Draft Review does lament in a number of places the lack of data and in relation to taxis and does say on page 42. *There is no data that allow a robust comparison of WAT response times to other taxis.*

It may be the case the Review had limited data however extensive data does exist. Queensland Transport has been collecting data from taxi dispatch companies since the inception of service contracts in 1996. In the first few years some companies reporting was a little haphazard as I understand however this was corrected in 2000 following a review of accessible taxi response times. The reports are made on a three monthly basis and give response times of both standard taxis and WAT's.

In 2006 I was granted access to a service report from my local taxi dispatch company by taking a Freedom of Information case against Queensland Transport. This should have opened up access to the entire data base held by Queensland Transport of information gained through the taxi service contracts throughout Queensland.

The FOI case consisted of gaining access, losing on appeal then winning the matter when the Office of Information Commissioner reviewed the case. (No 53652) The Commissioner dismissed objections to release of the information on a number of grounds including commercial value, adverse effect, confidential information and that of public interest. Two paragraphs below are worthy of repeating.

*62. It is not strictly necessary, given my findings above, to consider the application of the public interest balancing test. However, I wish to note my view that there is a strong public interest in disclosure of the matter in issue in this review, such that its disclosure would, on balance, be in the public interest.*

*65. There is also a public interest in giving the public the opportunity to scrutinise Queensland Transport's role in ensuring that minimum service levels are being met by taxi booking services in Queensland. I consider the disclosure of the matter in issue would enhance the accountability of Queensland Transport in that regard.*

Based upon the FOI case I consider Queensland Transport's data base should be available to the Review if requested. The Review could gain a deeper understanding of the performance of taxis both standard and WAT and enable change in regulation where necessary for the betterment of all concerned much earlier than waiting for results from recommendation 7.

Further the Queensland reporting procedures may be a guide for a national structure.

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