



Public Service Association of New South Wales

General Secretary: Anne Gardiner • President: Sue Walsh

160 Clarence Street, Sydney

GPO Box 3365, Sydney NSW 2001

Telephone: 02 9220 0900

Facsimile: 02 9262 1623

E-mail: psa@psa.asn.au

Internet: www.psa.asn.au

ABN: 83 717 214 309

In reply please quote:

23 August 2013

PK:jj A13/1127

Mr Nicholas Davison
Principal Manager Industrial Relations
Transport for NSW
Level 6, 18 Lee Street
CHIPPENDALE NSW 2018

By email: Nicholas.Davison@transport.nsw.gov.au

Dear Nicholas,

Re: Public Passenger Services

The Public Service Association writes regarding the feedback process and commitments given by Roads and Maritime Services (RMS) to a sound consultation process for the area of Public Passenger Services (PPS).

The Association's members have advised of their disappointment at RMS not responding in writing with adequate regard given to the close of feedback. RMS would be well aware that this dispute in PPS has consistently escalated due to the lack of regard for timely communication by RMS.

The Association will be noting this issue in the report back at the IRC and seeking a further extension to the feedback period.

Please find attached:

1. A proposed structure from our members that allows Public Passenger Services to remain as one unit and work with a budget of \$10.1 mil with saving of \$2.37 mil delivered.
2. Feedback and questions associated with the RMS proposed restructure.

Should you have any queries regarding this letter please do not hesitate to contact PSA Organiser Peter Kelly on 0418 254 714.

Yours faithfully,

Peter Kelly
Organiser

Public Passenger Services General questions

The following questions concerning public safety therefore arise:

- With the current Government's emphasis on the One-Stop Shop philosophy, why has the fact that the Public Passenger Services Section is precisely this model been ignored? Who made the decision to delete this service to public passenger service authorised drivers, authorised networks, authorised taxi inspection stations, accredited operators and taxi-cab and private hire vehicle licence holders?
- Why has the public passenger service legislation been ignored?
- Is this legislation to be repealed? If so, when?
- If the legislation is to remain, where are the subject matter experts?
- The loss of the knowledge and skills base in PPS which has taken years to achieve is inconceivable. The Principal Manager, the total subject matter expert on public passenger transport and the legislation has his position/name notated "NO LONGER REQUIRED". How does RMS propose to continue the customer services provided by PPS when this skills/knowledge base has not been recognised anywhere in the restructure?
- How does RMS justify making "savings" by abolishing a One-Stop shop facility which collected \$29 million in government revenue last year with an operating budget of \$12.5 million and expenditure from that fully funded budget of \$9.2 million?
- If RMS' insight is to create a multi-skilled OneRMS why doesn't the restructure show any indication that RMS is building on the skills/knowledge base which already exists and using an already successful One-Stop shop facility? Instead, the indication is that RMS will start a new organisation – how does RMS propose to operate in the interim?
- Who made the decision to separate and disperse the functions carried out by PPS through its On-Stop shop facility?
- Who was consulted and how did RMS arrive at this position? Where is the "proposed" operating model? We confirm that none of the management staff within PPS were consulted or involved in the restructure proposal? Why is there NO focus on public passenger vehicles/drivers/operators/networks in any of the PDs attached to the proposed structure – from every aspect of the legislation?
- Is the "Strategy Artefact" produced by Dr Diccon Vokins and entitled "Accreditation and Assurance Branch Targeted Tactical Compliance Plan for Taxis: Business Tactics within a Strategic Framework" considered to be the "consultation process" associated with PPS? If so, how does this relate to what PPS does and how was it determined from this report that PPS should be disbanded? How does it relate to the private hire vehicle and bus industries of NSW? And, more precisely, how does it relate genuinely to anything PPS does in relation to the public passenger legislation? How does a consultancy that cost more than \$200,000 taxpayers' funds justify the abolition of PPS? Where does this report fit in and how has it been used by RMS' Reform Committee? From the report's outcomes it appears that the restructure does not adhere to its overriding recommendation that PPS continues to operate as it is.
- Who will be trained in the understanding and application of the public passenger transport legislation and by whom?
- Who will hold delegations under the public passenger transport legislation? (For example, who will be responsible for making decisions on suspensions,

cancellations, variations, refusals of driver authorisations, operator accreditations, network authorisations, inspection station authorisations?)

- PPS staff have been “assigned” to up to four different General Managers under the proposed structure (thereby abolishing the One-Stop Shop facility) and “slotted” into positions which have no relevance to the functions they currently undertake.
- What is the exact model RMS is operating under for the administration of public passenger services in NSW and how is it projected that this offers a better alternative to the One-Stop Shop facility?
- What will happen with TfNSW’s contract with CrimTrac for criminal history background checks on applicants for public passenger vehicle driver authorisation or public passenger service operator accreditation? (The contract is not with RMS and is very strict in terms of the contract parties and the conditions contained therein.)
- Who will undertake the regular CrimTrac audits (required as part of the contract conditions) conducted by PPS within the “proposed” structure?
- What “model” (matching principles and guidelines) was used to place staff from PPS to “positions” in the restructure? Who made these decisions?
- What stakeholders – such as NSW Taxi Council, BusNSW, the NSW Taxi Industry Association, the NSW Taxi Driver Association, the MTA, the travelling public, public passenger vehicle drivers, operators, licence holders, networks, the Disability Council, the Office of Transport Safety Investigations, NSW Police Service, Sydney Airports Corporation, IPART, the CrimTrac Agency, etc etc – have been consulted about the proposed changes to the One-Stop Shop?
- Why has the Principal Manager, Compliance and Regulation been deleted from RMS’ structure? The Principal Manager is the consummate subject matter expert in public passenger legislation – in understanding it and applying it – and the proposed structure has “No longer Required” noted beside his name and position. Who made the decision that there is no place for a subject matter expert in the restructure? Why was this decision made?

MEDICAL ASSESSMENTS

- There are **major** differences in medical reporting requirements between authorised public passenger vehicle drivers and residents of NSW seeking a normal driver licence.
- How does RMS propose to ensure fit and proper assessments, including, but not limited to, **medical assessments** for authorised public passenger vehicle drivers will continue to ensure the **safety of the travelling public of NSW**? The Public Passenger Services Section currently manages 52,000 authorised public passenger vehicle drivers.
- Who will conduct medical assessments in accordance with Section 29 (2) (e)(i) of the Passenger Transport Regulation 2007?

To suggest that the driver of a bus which can carry up to 100 passengers (articulated bus) is a similar driving task to that of a person undertaking a medical because of advanced age is misleading at the least and can compromise public safety if such a philosophy is adopted holistically.

- Public Passenger Services currently utilises the services of a doctor with specific medical occupational qualifications and 2 registered nurses with occupational qualifications for reviewing medical assessments provided by public passenger

vehicle drivers. While RMS has a medical section that **processes** medical assessments it does not have any medically trained processors involved in the standard process.

- Was the Office of Transport Safety Investigation's (OTSI) Report, and recommendations, following the Spit Road, Mosman bus accident on 14 November 2005 considered in the "restructure"? In particular, but not limited to OTSI's recommendations to the then Ministry of Transport:

"Ensure that it maintains an independent capability to conduct thorough and timely reviews of medical assessments of drivers holding, or seeking to hold, a Public Passenger Vehicle Driver's Authority".

"Review its system of monitoring adherence to the health assessment regime;

Review its system of monitoring compliance with any special conditions attached to a driver's authorisation."

- To ignore the above can only be described as "corporate amnesia".

BUS OPERATOR ACCREDITATION SCHEME (BOAS)

BOAS has been abolished in the proposed structure.

- Are you aware of what BOAS actually does?
- Who undertook an appropriate risk assessment when making this decision?
- What was the result of the risk assessment? How has the proposed structure been developed to ensure these important safety critical functions continue?
- Can you explain your vision of bus safety and how the regulator will now achieve this? Additionally have the following issues been considered?

The proposed structure of RMS includes the creation of two bus safety officers which are placed in the "ACCREDITATION BRANCH". The role of bus safety officer reflects responsibilities transferred from the Independent Transport Safety Regulator and is an entirely different role to functions undertaken by BOAS. We have not been able to identify the reasoning process behind placing such an important responsibility into a branch that does not appear to have the experience to undertake such responsibility.

- Who within the Accreditation Branch has the necessary qualifications or experience to undertake the duties of these roles?
- The bus safety officer roles are graded at a low level. Why?
- Who will be responsible for the management of bus safety for NSW?

Under the *Passenger Transport Act 1990* (the Act), all operators of public passenger bus services must be accredited, to be able to provide services legally in NSW. Applicants for accreditation must complete an accredited bus operator training course which accords with the training standards issued by TfNSW on 7 April 2006.

BOAS was introduced on 1 July 2005 to improve bus safety, to ensure that bus operators comply with the requirements of the Act by providing safe and reliable passenger services and to improve the effectiveness and efficiency of bus operations. It was also introduced to align with the wider bus reform process, to formalise accreditation standards and

conditions and to consolidate various requirements applicable to operators under the Act. BOAS also responded to industry wide concerns about weaknesses detected in the industry.

The key elements of BOAS are:

- A requirement for operators to apply for reaccreditation and renew accreditations every three years;
- An auditing program which includes Annual Self Assessment Reports (ASARs) and three yearly independent audits;
- Standards incorporated in a comprehensive handbook;
- An Audit Tool;
- Safety Management Systems and Drug and Alcohol Programs.

The accreditation process requires that the operator is a person of suitable character and fitness and has the competency to operate public passenger services in accordance with the Standards and Conditions prescribed by the Act and the Regulation.

There are two types of bus operator accreditation comprising Regular Passenger Services (RPS) and Long Distance, Tourist and Charter Service (LDTCS). The principal purpose of accreditation is to ensure safe and reliable passenger bus services to the travelling public of NSW.

With the deletion of BOAS and no reference in the restructure of RMS, the following questions arise:

- Who will be responsible for the independent Bus Operator Accreditation Scheme certified auditors?
- Who will be responsible for the Annual Self Assessments of accredited bus operators?
- Who will ensure that accreditation requirements are maintained?
- TfNSW issues hundreds of millions of dollars worth of bus contracts to regular route and school bus service bus operators in NSW. Who will ensure that bus contracts issued for regular route and school bus services across NSW by TfNSW are issued to accredited bus operators?
- Who will undertake the skills assessment and recertification of independent auditors? The person who undertakes the skills assessment and recertification is required to be certified with RABQSA. Who has the RABQSA qualifications within the RMS restructure to certify auditors?
- Who will be responsible for the ongoing management of independent auditors who undertake audits for accredited bus operators in accordance with the Passenger Transport Regulation 2007?
- Who will be responsible for training of auditors who undertake accredited bus operator audits?
- Who will be responsible for issuing Information Alerts about bus safety issues?
- Who will be responsible for the Bus Incident Management Database?
- Who will be responsible for reviewing independent audits provided by accredited bus operators?
- Who will TfNSW's regional officers (Wollongong and Newcastle) report to regarding independent audits to ensure consistency? How will TfNSW's regional offices in

Newcastle and Wollongong be incorporated into RMS' proposed structure if the BOAS function no longer exists?

- Who will accredited bus operators contact for exemptions and extensions for audits? Who will assess/review and approve these requests?
- Who will accredited bus operators contact for exemptions on maintenance and other associated issues? Who will review/assess and approve these requests?
- Who will update and maintain the Annual Self Assessment Reports for accredited bus operators? There are approximately 1500 reports submitted per year.
- Who will assess/review and approve fit and proper, good repute and financial viability of applicants for bus operator accreditation?
- Who will assess/review and approve requests for upgrading bus operator accreditation?
- Who will inspect/attend proposed operator's sites to ensure Council approval has been given for bus depots and that these sites meet standards?
- Who will prepare show cause, suspensions, cancellations and refusals for bus operator accreditation?
- Who will administer the exemptions already given to certain accredited bus operators?
- TfNSW issues millions of dollars worth of bus contracts to regular route and school bus service bus operators in NSW and depend on BOAS to ensure that the operators are appropriately accredited and have in place required risk assessments/safety management systems in place. How does RMS propose to ensure that TfNSW has the correct and accurate information about bus operators?

LICENSING AND ACCREDITATION (incorporating vehicle licensing, public passenger service operator accreditation and public passenger vehicle driver authorisation)

- Driver authorisation and vehicle licensing (taxi-cab and private hire vehicle) are two completely separate and distinct entities under the public passenger legislation. Driver authorisation is a specific description and no distinction has been made between "licensing" and "authorisation" in any identified position description/function in the restructure? Where is this function?
- Who will undertake "fit and proper" assessments in accordance with Section 29 (1) and (2) of the Passenger Transport Regulation 2007?
- Who will undertake the Sydney Knowledge and Regulation Tests for taxi-cab drivers and where will they be undertaken? PPS staff supervise over **1600** tests per annum and passing this test is a vital element in whether or not an applicant for a metropolitan taxi-cab driver authorisation is successful or not?
- Who will be responsible for the high volume of telephone and counter enquiries and where will these enquiries be directed? How does a dispersed model adhere to the "customer is at the centre of everything we do"?
- Who will issue warning letters to public passenger vehicle drivers in relation to criminal and traffic matters detected through daily data matching – in accordance with Section 44 of the Regulation?
- Who will hold the delegation to lift suspensions in instances where authorised drivers meet the criteria in accordance with section 29(2)(b) of the Regulation?

- Who will be responsible for issuing Wheelchair Accessible Taxi driver authorisations in conjunction with the NSW Taxi Council in accordance with section 43 of the Regulation?
- Who will conduct visa checks on driver authorisation/operator accreditation applicants in conjunction with the Department of Immigration and Citizenship?
- Who will determine tenure for applicants for driver authorisation?
- Who will be responsible for the implementation of mutual recognition criteria for interstate and New Zealand driver authorisation applicants?
- Where is the adjudicator for "fit and proper" assessments of applicants for public passenger vehicle driver authorisation, operator accreditation, taxi-cab network authorisation and taxi-cab inspection station authorisation and who is this person – what knowledge do they have of the specifics of the public passenger legislation?
- Who is responsible for the implementation of the Interstate Driver Licence (IDL) implementation scheme?
- Who will assess and issue new public passenger vehicle driver authorisations? Who will assess and issue renewal public passenger vehicle driver authorisations? Where will these authorisations be issued from? Where is the counter to be located?
- Who will undertake daily data matching (COPS and DRIVES) for authorised drivers and accredited operators? Who will collate the information received and disperse the information to the appropriate areas for attention? What priority will be given to this information if it is to be dispersed among three or four different Branches?
- Who will assess, review and accept proposed taxi-cab company livery and uniforms?
- Who will assess Wheelchair Accessible Taxi (WAT) licences - new and renewal applications? Who will assess operator and proposed drivers, vehicle compliance, etc.?
- Who will be responsible for managing and calculating taxi-cab licence values through the current CPIs?
- Who will be responsible for evaluating the monthly taxi-cab licence value average and the calculation of private hire vehicle licence fees in country/regional NSW using the bond rates?
- Who will be responsible for publishing this information?
- Who will be responsible for managing and reviewing the various types of taxi-cab licences, including, but not limited to, Nexus licences, stand-by taxi-cabs, time restricted taxi-cab licences awarded under the Hire Car Compensation Package?
- Who will be responsible for assessing the equity in time restricted taxi-cab licences awarded under the Hire Car Compensation Package when those taxi-cab licences are transferred (sold)?
- Who will be responsible for the on-hold and daily changeover of accredited operators for taxi-cabs and private hire vehicles?
- Who will be responsible for assessing vehicles where accredited operators wish to change vehicles?
- Who will be responsible for the collation of monthly statistics prepared and distributed to PPS' stakeholders in relation to authorised drivers, accredited operators, accredited taxi-cab networks, cancellations, suspensions, refusals etc.?
- Who will be responsible for managing the accreditation payments/renewals for accredited operators?

- Who will issue "on-management" letters for taxi-cab and private hire vehicle operators? And, who will assess whether the nominated managers/directors of those accredited operators are fit and proper?
- Who will ensure/monitor that when a taxi-cab or private hire vehicle accredited operator is absent from the location for which the licence is issued for any period of time (for example, on holidays) that another accredited operator is managing that service?
- Who will be responsible for assessing/reviewing and issuing private hire vehicle licences?
- Who will undertake taxi-cab licence transfers (ie sales)? Where will these be conducted from?
- Who will be responsible for the monthly calculation of the transfer tax applicable to taxi-cab and private hire vehicle licence transfers?
- Who will issue private hire vehicle replacement vehicle permits? Where will these be issued from? Where will the counter for these transactions be located? Where will the decision be made that the permit can be issued and is legitimate? Who will ensure that the permit is returned at its expiry and that the private hire vehicle to which the licence is attached is back on the road?
- Who will process monthly private hire vehicle licence fees? Who will monitor these payments? Who will issue default letters to private hire vehicle short-term licence holders?
- Who will be responsible for ensuring that private hire vehicle licence holders whose payments are in default are cancelled and who will ensure that those licence holders are taken off the road because they do not hold a valid licence?
- Who will manage and administer the Annual Taxi Tender Process?
- Who will be responsible for the preparation, assessment and approval of taxi tender licence documents?
- Why has there been no allocation of staff resources for this process?
- Who will conduct the tender? How will tenderers be assessed?
- Where will a service be set up to allow tenderers who do not have access to computers to submit their applications on line?
- Where will successful tenderers attend to pay the "Completion Bond"?
- Who will be responsible for issuing letters to successful/unsuccessful tenderers?
- Who will be responsible for issuing renewals to successful tenderers who can renew the licence for up to nine years after the initial year of the annual taxi licence?
- Who will be responsible for taxi tender instalment payments and declines through the Westpac Payway system?
- Who will be responsible for monitoring expired taxi-cab/private hire vehicles licences?
- Who will be responsible for assessing whether or not to accept a late application for a licence renewal? Which area does this process fall under?
- Who will be responsible for identifying non-licence holders operating a public passenger service and ensuring that these operators are referred to compliance officers for investigation/prosecution etc.?
- Who will undertake daily data matching, collate the information received and disperse the information to the appropriate areas for attention? What priority will

be given to this information if it is to be dispersed among three or four different Branches?

- Who will be responsible for the AP file held in PPS for registered authorised taxi-cab companies/networks/operators who claim payments through the Taxi Transport Subsidy Scheme which is administered by TfNSW?

FINANCIAL ANALYST

- Who will assess the financial capability of applicants for WAT licences?
- Who will assess financial viability of public passenger service operators to ensure, for example, that they have the financial capacity to maintain vehicles, keep insurances required under the legislation, etc?
- Who will assess applications for the WAT vehicle interest free loans (the budget for which is provided by TfNSW)? This "scheme" was introduced in 1987 to encourage the deployment of WATs in regional NSW. Where is it allocated within the restructure?
- Who will undertake financial viability assessments for accredited operators who wish to increase the number of vehicles they operate and recommend/refuse an increase in vehicles operated?
- Who will review the financial viability of authorised taxi-cab networks on a rotational basis as required under Section 7 of the *Passenger Transport Act 1990*?

STRATEGY AND REPORTING

- Who will be responsible for managing the taxi-cab secure taxi ranks?
- Who will be responsible for monitoring/assessing WAT taxi-cab driver incentive payments?
- Pursuant to clause 43 of the Passenger Transport Regulation 2007 who will do the development, implementation, review and evaluation of training of drivers including remedial training.
- Who will be responsible for taxi cameras system?
- Pursuant to clause 114 of the Passenger Transport Regulation 2007 who will monitor compliance of the security cameras requirements in public passenger vehicles.
- Who will be responsible for managing the Authorised Taxi Inspections Stations program across NSW, approx 117? Pursuant to clause 119 of the Passenger Transport Regulation 2007 who will monitor accreditation, audit and regular inspection of taxi cabs in accordance with standards, probity and conduct of taxi inspection stations.
- Accommodation standards in taxis - Pursuant to clause 109 (7) of the Passenger Transport Regulation 2007 who will monitor that taxi cabs are compliant with circular 0-14-4 Single Uniform Type Inspection (SUTI) Manual for Third Edition Australian Design Rules (ADR's).
- Who will be responsible for the pre-paid taxi fare project? Pursuant to clause 163A of the Passenger Transport Regulation 2007 who will monitor the taxi fare pre-

payment trial on the Central Coast and the pre-paid taxi fares trial at the two Kings Cross secure taxi ranks.

- Who will be responsible for managing the Secure Taxi Ranks program? We currently manage the contract, contract variation, payments, reporting, training protocols, assessment, evaluation procedures and procurement through public tender etc. for 47 secure ranks within NSW.
- Who will monitor that security guards engaged by Roads and Maritime Services comply with the contract requirements and ensure the guards perform their duties in accordance with the regulations pertaining to taxis.
- Who will be responsible for compliance action as result of incidents at the secure taxi ranks?
- Who will be responsible for managing the Taxi Performance Data as a requirement of the Taxi Network Standards under the Passenger Transport Act 1990 and Passenger Transport Regulation 1997 i.e. monthly reporting of the standard taxi KPIs, WAT KPIs and WAT performance by taxi networks?

This data is required by IPART for the annual taxi licence determination and taxi fares determination. The data is also provided to TfNSW for planning and programs under the Policy and Regulation Division.

- Who will be responsible for the management of the Taxi KPI database which also includes being the Online Support Officer for the database for 15 Sydney metropolitan taxi networks and 3 regional taxi networks?

It is also proposed to extend the taxi KPI requirements to include country taxi networks. Who will be responsible for the project development to include the enhancements to the Taxi KPI Database and provide 'Online Support'?

- Who will be responsible for compliance action required as a result of taxi performance? This may include penalties.
- Who will be responsible for managing the taxi fringe area performance KPI data as part of the fringe area licences?
- Who will be responsible for managing the publication of the taxi performance data on TfNSW's website?
- The Bus Incident Management Database (BIMD) is a regulatory requirement for all accredited bus operators and they must report bus incident/accidents to RMS via the database.
- Who will be responsible for managing the BIMD which also includes being the Online Support Officer and liaising with approximately 1,500 bus operators throughout NSW?
- It is also proposed to extend the BIMD as a result of the BIMD Improvement Project. Who will be responsible for the project development to include the enhancements to the BIMD and provide 'Online Support'?
- Who will be responsible for the daily, monthly and bi-monthly bus incident reporting?
- Who will be responsible for compliance action required as a result of a bus incident?
- Who will be responsible for liaising with the Newcastle / Wollongong TfNSW offices as a result of a bus incident within their jurisdiction?

COMPLIANCE

- How does RMS propose that FOUR compliance officers can achieve an on-road presence that covers all of NSW that will ensure all public passenger vehicles and drivers in NSW comply with public passenger legislation?
- Currently twenty-one compliance staff undertakes activities in direct alliance with the public passenger transport legislation in NSW. The proposed structure indicates that FOUR compliance officers will undertake on-road activities and FOUR compliance officers will conduct investigations for all of NSW. There are currently 52,000 authorised public passenger vehicle drivers and 11,500 accredited public passenger service operators, 100 authorised taxi-cab networks/booking services and 79 country NSW and 28 Metro ATIS' (each one has multiple taxi examiners who authorised by PPS). Compliance officers currently undertake approximately 100 investigations of public passenger vehicle drivers, operators and networks per month. Currently compliance officers undertake approximately 16 on-road operations per week plus sporadic special operations with other government agencies in identified "hotspots", plus approximately four regional NSW compliance patrols (approximately one week each patrol) per annum.
- In view of the above, how does RMS propose to continue the efficient and effective compliance/management of the public passenger industry in NSW?
- Will joint compliance operations in "hot spots" in the Sydney Metropolitan Transport District, regional NSW and the Sydney Airport Precinct continue? If so, how is it proposed that these operations will be undertaken and by whom?
- Who will investigate Transport Taxi Subsidy Scheme Fraud?
- Who will investigate complaints concerning Authorised Taxi Inspection Stations (ATIS)?
- Who will audit Authorised Taxi Inspection Stations (ATIS)?
- Who will appoint taxi meter sealers?
- Who will undertake regular inspections of taxi-cabs, private hire vehicles and buses in NSW (not just in Sydney)?
- Who will undertake audits of authorised taxi-cab, private hire vehicle and bus operators?
- Who will undertake assessments of vehicles suitable for use as a taxi-cab?
- Who will be responsible for reviewing/assessing technical enquiries concerning safety equipment fitted to taxi-cabs and buses?
- Who will be responsible for the regular and on-going review of inspection standards for ATIS?
- Who is responsible for the regular and on-going monitoring of authorised taxi-cab, private hire vehicle and bus drivers?
- Who is going to be responsible for allocating "Internal Review" requests which are form part of the Appeal Rights of cancelled or suspended, or variations imposed on public passenger vehicle drivers and operators?
- Who is going to conduct the Internal Reviews?
- Who will be responsible for preparing, presenting and delivering training sessions to NSW Police Service officers in relation to the *Passenger Transport Act 1990* and the *Passenger Transport Regulation 2007*?

- Who will be responsible for determining that an authorised public passenger vehicle driver must attend remedial training courses in order to continue to be authorised?
- Who will prepare and deliver presentations to taxi drivers during the Taxi Driver Silver Service lectures conducted at authorised taxi training schools? Metropolitan authorised taxi cab drivers must complete this course in order to continue to hold driver authorisation.
- Who will manage and maintain the electronic penalty infringement notice system (PinForce) operated by compliance officers?
- Who will investigate and take action against public passenger vehicle drivers who have been subjected to a positive (or refused to be tested) Drug and Alcohol Test?
- Who will undertake site inspections for applications for public passenger service operator accreditation?
- Who will investigate issues with the State Debt Recovery Office (SDRO) when authorised drivers have been issued with an infringement for camera detected offences and have provided false information on the identity of the driver of the vehicle infringed?

TAXI NETWORK OFFICER (Compliance)

Taxi Network – dedicated position following the Parliamentary Enquiry into the Taxi Industry in 2009. Position ABOLISHED in proposed restructure.

- Who will be responsible for monitoring taxi networks to ensure compliance with Network Service Standards?
- Who will be responsible for ensuring applicable performance standards are understood and properly reported by taxi networks?
- Who will be responsible for investigations into taxi network non-compliance with service standards and for instigating intervention where necessary?
- Who will be responsible for collating and maintaining a central database of Network Information including current by-laws, vehicle livery and driver uniforms?
- Who will co-ordinate and present the Taxi Driver Remedial Course? This course was implemented following a recommendation by the Administrative Decisions Tribunal so that drivers have an opportunity to review and correct their poor performance before they are suspended and/or cancelled as an authorised driver. The remedial course includes instructions in;
 - The taxi drivers 'Code of Conduct'.
 - Customer service.
 - The 'Charter of Rights'.
 - The top 10 customer complaints.
 - Authorised drivers' obligations under the passenger transport legislation.
 - How to access 'My Records'.
 - Dealing with people - best practice.
 - Fare evasion.
 - Swearing/sexual harassment/fares and overcharging.
 - Dealing with difficult customers.
- Who will promote, demonstrate and enforce correct complaint investigation procedures and resolution by taxi networks?
- Who will investigate taxi networks who do not meet service levels?

- Who will undertake analysis of complaint data, audit the outcomes of investigations and taxi network KPI performances?
- Who will investigate complaints from taxi owners, drivers and operators concerning taxi network operations in addition to general service delivery from the travelling public in a manner which demonstrates best practice and accords with the *Passenger Transport Act 1990*, procedural fairness and natural justice.
- All taxi networks, taxi co-ops and booking services (State-wide) are familiar with the Network Compliance Officer's role in assisting with issues relating to service standards, by-laws and KPI reports. Who will be their point of contact now?
- Who will ensure Taxi Networks maintain their service standards and submit their KPI reports?
- Who will review changes to Network By-Laws to ensure any proposed changes meet the requirements under the *Passenger Transport Act 1990* and Regulations.

TAXI COMPLAINTS OFFICER (COMPLIANCE)

Position established following Parliamentary Enquiry into Taxi Industry 2009 when it was recognised that previous processes for handling customer complaints were inadequate. Manages the Customer Feedback Management System (CFMS) and deals with serious complaints by taxi customers such as those of inappropriate behaviour by taxi drivers (including those of a sexual nature), guide dog refusal, criminal activity etc.

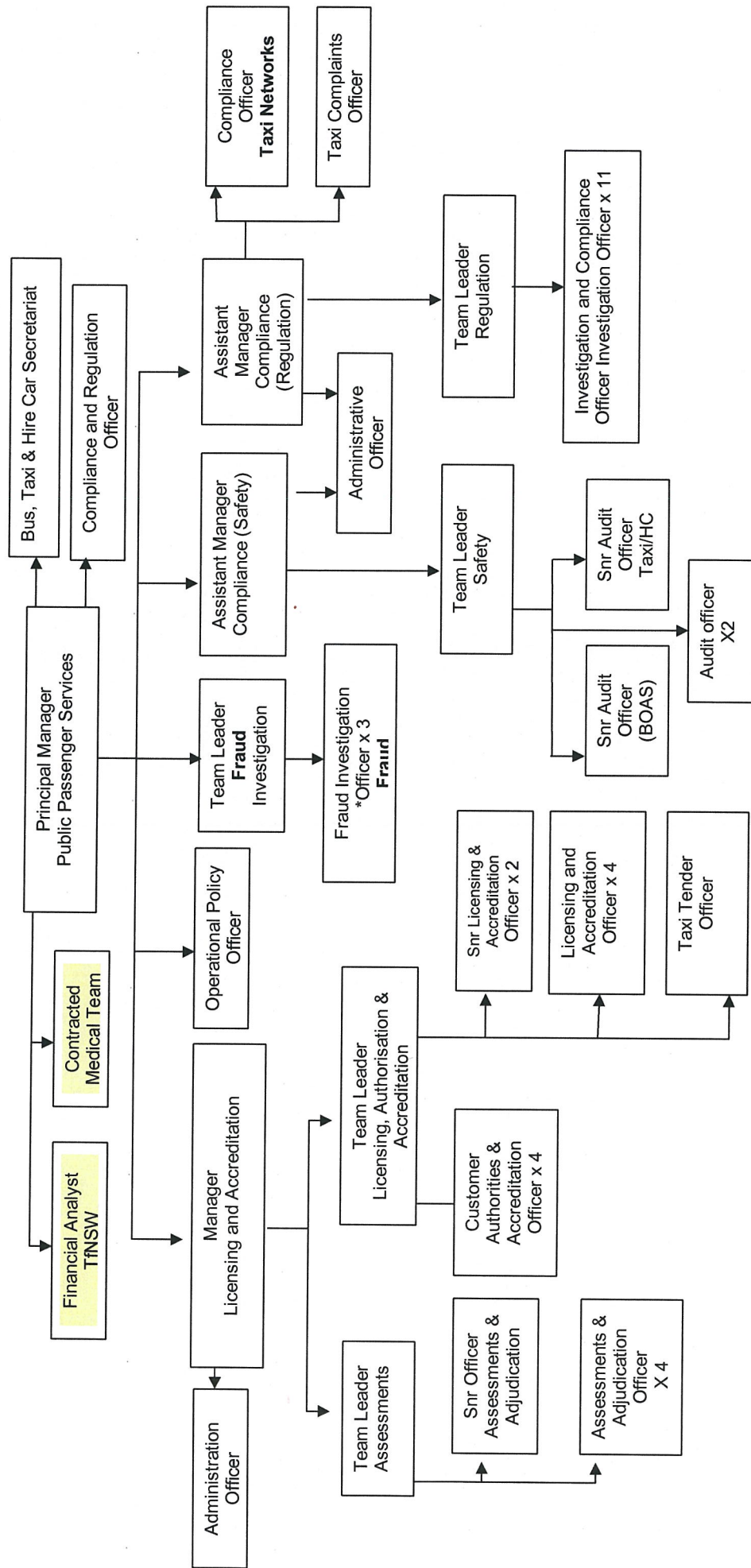
- Who will be responsible for the administration of the Customer Feedback Management System (CFMS)?
- Who will be responsible for the Industry Feedback Management System (IFMS)?
- Who will be responsible for the registration into CFMS of ALL correspondence relating to taxi services (drivers/operators/networks)?
- Who will be responsible for the distribution of CFMS Serious Issues to the Compliance Unit for attention/investigation?
- Who will be responsible for the compilation of driver history of all compliance referrals in CFMS?
- Who will be responsible for CFMS remedial driver issues to compliance?
- Who will be responsible for the distribution of requests for Review Outcomes to compliance?
- Who will be responsible for the distribution of feedback to taxi networks for investigation?
- Who will be responsible for correspondence with Payment Service Providers for driver identification/verification?
- Who will be responsible for customer follow-up on CFMS registrations – non-response by networks?
- Who will be responsible for maintaining records on feedback registrations in CFMS and IFMS?
- Who will be responsible for maintaining records on issues raised in CFMS and IFMS?
- Who will be responsible for maintaining statistics/records on feedback completion rates for network KPIs?
- Who will be responsible for maintaining feedback data for IPART submissions?

- Who will be responsible for the registration of SACL feedback on taxis, private hire vehicles and transit vehicles?
- Who will be responsible for the registration of Secom feedback from Secure Taxi Ranks?
- Who will be responsible for the distribution of CFMS feedback to country and regional networks?
- Who will be responsible for undertaking CRMS and IFMS training for new staff at taxi networks?
- Who will be responsible for liaison with the Call Centre on CFMS registration and training?
- Who will be responsible for the registration and handling of all inbound compliance matters requiring investigation into the Objective database?
- Who will maintain records in Objective – that is, registration and closure?
- Who will be responsible for maintaining records and meetings of the CFMS User Group quarterly meetings?
- Who will be responsible for the responses to Network requests for taxi driver/operator history requests?
- Who will be responsible for recording and invoicing network driver/operator history requests?
- Who will be responsible for monthly reporting of compliance and network activity to TfNSW for publication on TfNSW's internet site?
- Who will be responsible for updating of taxi network information in TIMS for individual taxis?

DRAFT – For discussion purposes only
Public Passenger Services

EFT - 50

(Saving 5 EFT positions from current structure just under 10%)
 (Can work with budget of \$10.1mil saving of \$2.37mil on existing fully funded budget from TfNSW)



*Business case to TfNSW for additional funding for TTSS fraud investigations this would increase savings from current budget allocations from TfNSW for Public Passenger Services.