



Will be considered for release with redactions

MIN-4277 Small Passenger Service Association conference

13 September 2023

Provide information and speech notes to support the Minister's attendance at the Small Passenger Service Association (SPSA) conference on 28 September 2023.

Waka Kotahi NZ Transport Agency's response:

The SPSA (previously known as the New Zealand Taxi Federation) are concerned about the lack of oversight from a regulatory perspective and have regularly advocated for change in the media. The SPSA have asked the Minister to consider:

- strengthening regulation, and in particular, advocating for the development of an industry body supported by Waka Kotahi
- changes to the Total Mobility Scheme to support increased access.

Development of an industry body

The idea of an industry body has merit. There is a gap in oversight of the taxi industry (from a regulatory perspective) following the changes in regulation from the 2017 law changes.

Approved Taxi Organisations (ATOs) had been a requirement previously, but are no longer required. Reputable and larger firms still operate in line with the principles of how ATOs operate, however in practice the 2017 changes have meant that independent operators are not subject to the same level of oversight. For example, requiring an independent operator to have a complaint register has little effect. Our regulatory experience shows that many independent operators (taxis), when questioned, are both unaware of the requirement and do not comply with it.

The other risk that we see is that independent operators are required to nominate people to have access to CCTV (required for taxis operating in large centres). If independent taxis have cameras, and only have an owner operator (for example), the driver will be the one responsible – which creates a risk for chain of evidence in the case we are investigating a case in which CCTV could pose a useful account of what has occurred.

An industry body could fill the void where previously ATOs were an oversight function. Waka Kotahi is developing an issues and options paper in advance of the review of Transport Service Licensing that Te Manatū Waka Ministry of Transport is embarking on later this year. From an early analysis of options, a form of enforced self-regulation, where an accredited industry body (or bodies) could undertake the role and fill the vacuum in the regulatory landscape left by ATOs is preferable – however this will require work and statutory change. Given the dependencies on the options, little has progressed aside from cursory 'blue skies' concept thinking. The SPSA could be one such body, however given the differences between the business models of taxis versus rideshare, it would be likely that more than one accredited industry body would be preferable.



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Total Mobility scheme review

The Total Mobility scheme provides subsidised door-to-door transport services for people who are unable to use buses, trains or ferries in a safe and dignified manner because of a physical, intellectual, psychological, sensory or neurological disability. The subsidy is offered up to a regionally adjusted cap.

Te Manatū Waka is currently undertaking a review of Total Mobility to investigate how it can be improved to create better outcomes for disabled people. The Terms of Reference for the review was agreed to by the Minister of Transport in July 2023.

Phase one of the review, *the purpose of the Total Mobility Scheme*, is underway. Te Manatū Waka is currently in the process of procuring contractors to undertake phases two and three of the review (beginning in mid-September 2023) which includes:

- *how the Total Mobility Scheme can be more accessible for disabled people, and*
- *how aspects of the Total Mobility Scheme's operations can be improved.*

There will be opportunities for disabled people and other key Total Mobility stakeholders to engage throughout the review which is expected to be completed in late 2024. The link to the review and Terms of Reference is available here: <https://www.transport.govt.nz/area-of-interest/strategy-and-direction/review-of-the-total-mobility-scheme/>.

Total Mobility scheme – feedback from users

The following is an extract from *Transport experiences of disabled people in Aotearoa New Zealand* (research report 690, August 2022 - <https://www.nzta.govt.nz/assets/resources/research/reports/690/690-Transport-experiences-of-disabled-people-in-Aotearoa-New-Zealand.pdf>).

Disabled people appreciate how the Total Mobility scheme in principle can allow people to access subsidised taxi trips to meet their various needs with more independence. However, it is limited in what it can provide for disabled people, compared to people who are not disabled, such as difficulty in booking trips spontaneously, during peak times, or during the evening or late at night.

The need to book ahead was compounded for many people by the limited availability of wheelchair-accessible taxis, which has consequences beyond a trip not being made. Some of the trip respondents described extra stress that would not have been incurred if they had more convenient and reliable transport choices:

- 'After hours there are very few vans available, even for emergencies and we had to walk/roll home at night because there wasn't a mobility taxi available when our van was getting repaired.'
- 'More Mobility Vans available at weekends. ... I had to wait 2 hours past my booking time to transfer my terminally ill husband back to his palliative care accommodation.'
- 'More hoisted available – often I ring around taxis, Driving Miss Daisy and some private providers, days in advance and still there is no vehicle available. My life is limited by this.'
- 'Friends invited me out for dinner but could not find a taxi Van that would collect me at 10 pm – 10:30 pm ... was told latest that would have one on road was 7:30 pm ...'

Participants who were blind or vision impaired described challenges in paying for their taxi rides using Total Mobility cards. Due to a taxi company's preference for contactless payment, one participant was asked by the driver to swipe their card themselves, which was impractical with their vision impairment. For those who require



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assistance from a guide dog, there are challenges from some taxi drivers who decline service or complain about the dog in their vehicle.

Some research respondents commented companion driving services provided a higher quality of service than taxis:

- “My mother uses Driving Miss My mother will not use a ‘normal’ taxi service as she feels unsafe with a male driver and it only drops off at the front door of the hospital not escorted to required clinic.”

However, despite the issues, some feedback from research participants particularly praised the door-to-door nature of the scheme and the benefits of the taxi services when the trip experience goes well for them:

- ‘I know a taxi will get as close to my destination without having to worry about parking my car a long distance away.’
- ‘For some appointments (e.g. hospital) I cannot be sure I will get a park so I tend to taxi.’
- ‘Taxi provides the pick-up drop off at the place where I need to be, which I otherwise would not be able to visit.’

An issue is identifying the true unmet latent demand for basic access. It is possible that the true number of trips not taken by some disabled people is higher than what is reported in survey results. When we put the question “describe the trip you decided not to take and why you decided not to go” respondents summarise with:

- ‘This is a hypothetical question. People who use wheelchairs simply live a life where they do not consider taking trips because of the accessibility issues they face. They would take trips every week if they could. No one likes to feel isolated and trapped.’

A significant number of survey respondents described not being able to make trips for medical or health purposes (260 mentions). These trips ranged in severity from being unable to collect prescription medicines, to missing GP or specialist appointments, to rescheduling surgery because they had no way to get there. This has multiple health impacts – not only are they missing out or postponing medical care, but they also have the added anxiety of knowing their health is declining because of transport problems.

- ‘A taxi never turned up and I had to miss a hospital appt because of it.’

Disabled survey respondents reported missing out on the following:

- employment, volunteering, or education purposes (68 mentions)
- significant events (57 mentions) such as a funeral, wedding, or tangihanga
- religious or spiritual purposes (50 mentions) such as church services, visiting the temple, or participating in Matariki celebrations.

Total Mobility - funding for wheelchair fitouts

s 9(2)(g)(i)

made an Official Information Act 1982 (OIA) request in May 2023 relating to this topic. A copy is attached for reference (reference OIA-12620).

The OIA response states funding to Public Transport Authorities (PTAs), including regional councils, to support operators participating in Total Mobility to install or replace wheelchair hoists is provided by Waka Kotahi through the National Land Transport Programme (NLTP). As part of developing the three-yearly NLTP, PTAs develop their public transport programme for inclusion in the NLTP.



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In preparing their public transport programmes, PTAs decide the size of their budget for hoist replacement and in approving the NLTP, Waka Kotahi decides what level of co-investment in that activity it will approve. The Waka Kotahi Funding Assistance Rate (FAR) paid to each PTA is 60 percent.

The funding allocated to wheelchair hoists purchase and installation in the NLTP has not been fully claimed by PTAs in recent financial years – ranging between 18 and 48 percent of the available funds claimed during the last five financial years.

Proactively Released

Speech Notes

Small Passenger Service Association Conference

Speech for: Hon David Parker, Minister of Transport

Date: 28 September 2023

Event begins at 9:00 AM

You will be speaking for 5-10 minutes

Speaking points

- Kia ora koutou.
- Thank you for inviting me to speak today.
- Industry associations play an important role in advocacy and oversight.
- They are powerful voices, working for the collective good of their membership as well as for the benefit of those who use the services their industry offers.
- I want to acknowledge the work the Small Passenger Service Association does to promote professionalism, passenger safety and regulatory compliance amongst its members.
- That mahi improves the standards of service of small passenger service providers all around the country, helping New Zealanders get to where they're going safely and efficiently, and it's very much appreciated.
- Our transport network underpins every facet of New Zealand life.
- The success of our communities and our economy depends very much on having a system of working roads and footpaths with sensible and appropriate regulation of the people and vehicles that use it.
- Keeping people safe on our roads is a key government priority.
- Chief amongst this is protecting people from harm, whether it be transport-related injuries, the effects of pollution or simply ensuring people reach their destination safely.
- To do this, we're trying to create a safe system where a mix of solutions combine to keep people safe.

- Safe vehicles, safe behaviours, safe roads and safe speeds work together to strengthen the whole system.
- We're using this system mainly to help us reduce physical harm in the form of deaths and serious injuries on our roads, but it works more broadly too.
- As operators, you play a vital role in the safe system, protecting drivers and customers alike.
- This is particularly important given the disruption in your industry in the last few years.
- The rise of new technology like rideshare apps and the 2017 legislative changes introduced to deal with them, has seen your members operating in a greatly changed environment.
- The Small Passenger Association has been active in raising concerns about issues around customer and driver behaviour, hours worked, and wanting more regulatory support.
- The workshops held last year brought all stakeholders to the table and has given us a much clearer picture of the problems currently being encountered as well as the improvements that could address them.
- These workshops identified the four next steps, and these have been signed up to by Waka Kotahi.
- This includes providing support for the development of an industry body.
- From a regulatory perspective the idea of an accredited industry body has merit.
- There is a gap in oversight of the taxi industry following the changes in regulation from the 2017 law changes.
- Approved Taxi Organisations (ATOs) were no longer a requirement.
- Reputable and larger firms still operate in line with the principles under which ATOs operated, however in practice the 2017 changes meant that independent operators don't have the same level of oversight and awareness of industry requirements.
- An industry body is a common-sense way of filling the void where ATOs previously operated.
- The first step for this process is underway now with Waka Kotahi is developing an issues and options paper in advance of the review of Transport Service Licensing that the Ministry of Transport is embarking on later this year.

- All options are on the table at this stage but certainly, the Small Passenger Services Association could be one such body.
- However, given the differences between the business models of taxis versus rideshare, more than one accredited industry body may be required.
- It's early days, but we can see that this work will be beneficial for the safety of drivers and customers, giving certainty to everyone about what's expected in terms of compliance, work practices and behaviour.
- Just as we are seeking to make our system safer, we're also intent on ensuring equity of access – that people are able to travel where and when they need to.
- Operators like yourselves provide a lifeline for our disabled community – people who are unable to use buses, trains or ferries safely because of a disability.
- The Total Mobility scheme provides subsidised door to door transport services for members of that community, many of whom report that you do an excellent job.
- I note also the concerns the Small Passenger Services Association has raised about the scheme including the costs of providing the services, difficulties in accessing available funding for wheelchair hoist installation costs, and variations in how subsidies are applied by different Public Transport Authorities.
- The Ministry of Transport is currently undertaking a review of Total Mobility to investigate how it can be improved to create better outcomes for disabled people.
- Phase one of the review *the purpose of the Total Mobility Scheme* is underway.
- Phases Two and Three will look at how the scheme can be made more accessible for disabled people and how aspects of the Total Mobility Scheme's operations can be improved.
- I know the Association has already signalled its intention to make a submission and your comments and feedback are welcomed.
- The review is expected to be completed in late 2024 and I'm sure the unique insight into the issues your membership can provide will be incredibly useful.
- The lines of communication are open and I have every confidence that if all sector stakeholders continue to work well together, resolutions will be easier to reach resulting in a safer, more accessible small passenger services New Zealand-wide.
- Thank you again for inviting me and I hope you all have an enjoyable and productive time here in Wellington.

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8 June 2023

[Redacted]

REF: OIA-12620

Dear [Redacted]

Request made under the Official Information Act 1982

Thank you for your email of 4 May 2023 to Te Manatū Waka Ministry of Transport requesting information on the Total Mobility Scheme under the Official Information Act 1982 (the Act).

Your request was transferred to Waka Kotahi NZ Transport Agency from Te Manatū Waka Ministry of Transport on 8 May 2023 as it is a matter we are responsible for.

I will address each of your queries in turn below.

1. *Providers of the service can apply for and sometimes receive subsidies for the costs of fitting out vehicles with specialised wheel chair lifting equipment. How is the funding for these hoists allocated to local government Regional Councils and how much in total has been allocated each year for the last five years?*

Funding to Public Transport Authorities (PTAs), including regional councils, to support operators participating in Total Mobility to install new/replace old wheelchair hoists is provided by Waka Kotahi through the National Land Transport Programme (NLTP). As part of developing the three-yearly NLTP, PTAs develop their public transport programme for inclusion in the NLTP. In preparing their public transport programmes, PTAs decide the size of their budget for hoist replacement and in approving the NLTP, Waka Kotahi decides what level of co-investment in that activity it will approve.

The level of co-investment provided by Waka Kotahi for hoist replacement to regional/unitary councils over the last five years is shown in the answer to question 11 below.

2. *Does the National Land Transport Fund set a maximum percentage for the costs to the subsidy for the fit-out of vehicle modifications (hoists)?*
3. *What is that percentage?*

Yes. The Waka Kotahi Funding Assistance Rate (FAR) paid to the PTA is 60 percent.

4. *Does the National Land Transport Fund set a maximum limit for the costs to the subsidy for the fit-out of vehicle modifications (hoists)?*
5. *What is that limit?*

Based on actual expenditure incurred and the 60 percent FAR, PTAs can claim up to the maximum allocation approved for them in the NLTP by Waka Kotahi for hoists. The limit is set by each PTA's programme, based on how much it is proposing to invest in the Total Mobility Scheme as it requires a co-investment from the PTAs.

6. *Are the percentages and limits standard across all local Government Regional Councils?*

The financial assistance rate of 60 percent for hoist replacements is standard across all PTAs.

7. *Under what circumstances is the subsidy for fit-out costs co-funded by NLTF and local Government Regional Council?*

This question is answered in questions 4 and 5.

8. *How many co-funded subsidies have been provided in each of the last five years by each local government region?*

The number of wheelchair hoists installed each year is publicly available under the subject "Total Mobility" at:

www.nzta.govt.nz/planning-and-investment/learning-and-resources/transport-data/data-and-tools/.

Therefore, I am required to refuse this part of your request under section 18(d) of the Act because the information you have requested is publicly available.

9. *Have any local Regional Councils requested a review of the subsidy paid for fit-out costs to further financially assist the providers of the service for any years over the last five years?*

We can find no record that any regional council has requested a review of the subsidy paid for fit-out costs over the last five years. Therefore, I am required to refuse this part of your request under section 18(e) of the Act because the document alleged to contain the information requested does not exist or, despite reasonable efforts to locate it, cannot be found.

10. *Has all of the NLTF allocated funding for vehicle fit-out costs been allocated for each year over the last five years?*
11. *If all the funding allocated has not be used, what percentage was unused for each year over the last five years?*

The funding allocated to wheelchair hoists purchase and installation in the NLTP has not been fully claimed by PTAs during the period 2017/18 to 2021/22. Figure 1 over the page outlines the funds claimed and not claimed.

Figure 1 showing the percentage of the Total Mobility Scheme vehicle fit-out funds used each year

Financial year	Claimed \$ NLTF	Not claimed \$ NLTF	Claimed %	Not claimed %
2017/18	61,352	276,424	18%	82%
2018/19	124,882	270,098	32%	68%
2019/20	176,190	193,014	48%	52%
2020/21	111,339	257,431	30%	70%
2021/22	90,942	324,363	22%	78%

12. If all the funding allocated has not been used, which local Regional Councils have not allocated funds and what percentage of that allocation is unused?

Figure 2 below shows how the current 2021/24 three-year allocation for wheelchair hoists purchase and installations has been drawn down by PTAs for the period July 2021 to May 2023 (noting that there are a further 13 months to go until the end of the 2021/24 period in which PTAs may fund host purchases and installations).

Figure 2 showing the current drawdown on the Total Mobility Scheme vehicle fit-out fund allocation

Organisation Name	Claimed NLTP to date (July '21-May '23 = 63.9%)	% Claimed NLTP to date (July '21-May '23 = 63.9%)	2021-24 Total Allocation
Auckland Transport	63,420	25%	253,680
Bay of Plenty Regional Council	-	0%	99,735
Environment Canterbury	-	0%	215,391
Gisborne District Council	-	0%	11,095
Greater Wellington	12,567	10%	132,116
Hawkes Bay Regional Council	9,468	23%	41,100
Horizons Manawatu	38,772	42%	92,376
Invercargill City Council	13,800	41%	33,600
Marlborough District Council	-	0%	14,400
Nelson City Council	-	0%	36,600
Northland Regional Council	-	0%	60,000
Otago Regional Council	13,770	15%	91,800
Taranaki Regional Council	-	0%	110,356
Waikato Regional Council	-	0%	36,000
All PTAs	151,797	12%	1,228,249

13. *The Small Passenger Service is rightfully classed as Public Transport. Have any of the Regional Councils given funding to groups who are not public transport small passenger services providers in any of the last five years (that is community groups, aged care facilities etc)?*

Regional Councils are responsible for making decisions around entering into contracts with individual small passenger service operators which provide the Total Mobility service, including for hoist installation/replacement. Waka Kotahi then provides a co-investment. The matter of which organisations are funded should be directed to the appropriate council.

14. *Passengers who are users of the scheme have their fares subsidies. This subsidy is covered by NLTF (60%) and local Government Regional Council (40%). Can you provide the total cost of subsidies by each region to run the scheme over their most recent financial year?*

The figures in the table below are the Waka Kotahi contribution for Total Mobility travel. They do not include the PTA contribution, or the fare paid by the passenger.

Figure 3 Waka Kotahi contribution for Total Mobility Travel

Organisation name	July 2021 - June 2022 (NLTF\$)
Auckland Transport	\$3,536,455
Bay of Plenty Regional Council	\$383,772
Environment Canterbury	\$2,130,118
Gisborne District Council	\$34,200
Greater Wellington	\$1,579,522
Hawkes Bay Regional Council	\$465,986
Horizons Manawatu	\$697,398
Invercargill City Council	\$320,878
Marlborough District Council	\$87,713
Nelson City Council	\$144,448
Northland Regional Council	\$223,546
Otago Regional Council	\$566,135
Taranaki Regional Council	\$283,106
Tasman District Council	\$50,441
Waikato Regional Council	\$404,426
West Coast Regional Council	\$73,112
All organisations	\$10,981,256

15. *Can you provide the number of trips subsidised in each region for the most recent financial year?*

This information is publicly available under the subject "Total Mobility" at:
www.nzta.govt.nz/planning-and-investment/learning-and-resources/transport-data/data-and-tools/.

Therefore, I am required to refuse this part of your request under section 18(d) of the Act as this information is publicly available.

Under section 28 of the Act, you have the right to ask the Ombudsman to review my decision to refuse parts of this request. The contact details for the Ombudsman can be located at www.ombudsman.parliament.nz.

In line with Waka Kotahi policy, this response will soon be published on our website, with personal information removed.

If you would like to discuss this reply with Waka Kotahi, please contact Ministerial Services by email to official.correspondance@nzta.govt.nz

Yours sincerely



David Shepherd

Acting National Manager Multimodal Integration