



Driving change: the Taxi Services Commission

Along with the weather and football, taxis were a much discussed topic in Melbourne and the talk was frequently far from complimentary. In 2011, the Victorian Government launched an inquiry into the taxi and hire car industry as a response to growing concerns about the safety, quality and accessibility of services offered. Acknowledging that the industry suffered from some serious systemic issues, the Government approved a suite of reforms recommended by the inquiry, including significant changes to the licencing process. The Taxi Services Commission (TSC) was established as a statutory authority in July 2013 to implement these reforms and replace the Victorian Taxi Directorate (VTD) which had been responsible for licensing, accreditation and other regulatory matters. Taking on this sizeable challenge was former Australian Competition and Consumer Commission chief Graeme Samuel. As TSC Chairman he faced an industry, so far, notoriously resistant to change.

Flagging satisfaction

Although taxis and hire cars¹ are privately owned and operated, they are considered an important part of Victoria's public transport network, offering convenient and flexible point-to-point travel for a diverse range of users. They are also particularly important in Melbourne; a large city with a widespread population and many outer suburbs inadequately served by public transport. Connections between public transport services are frequently unreliable or non-existent; even short cross-town trips in urban areas can be complex and time-consuming. Although the majority of Melburnians use taxis at least occasionally, elderly and disabled people – along with regional and rural residents – often depend on taxis to attend work, social functions or medical appointments. Melbourne also hosts numerous sporting and cultural events, attracting many locals and visitors. Indeed, over the past decade the nation's second-largest city has consolidated its place as a pre-eminent leisure destination. Melbourne's airports, including its sizeable international terminal, rely heavily on taxi services; meanwhile, cabs are one of very few public transport options available after midnight. For thousands of arrivals, a taxi ride is one of their first experiences in Melbourne, perhaps Australia.

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¹ In this context hire cars refer to pre-booked chauffeur driven vehicles such as limousines, as distinct from self-driven rental vehicles.

Prior to the commencement of the Inquiry, public satisfaction with taxi services had been in steady decline (*Exhibit A*) while the number of complaints to the Victorian Taxi Directorate had more than trebled since 2005 (*Exhibit A*). This was despite the fact that many passengers did not lodge complaints with service providers or authorities, believing it would make little difference. Most consumer complaints involved the cost and availability of taxis (the latter a particular problem during peak periods or in regional/rural areas) but the key issue was quality, specifically safety and driver conduct.² Recurring themes included drivers who:

- were discourteous and unhelpful;
- failed to maintain proper personal hygiene or clean vehicles;
- refused fares for short trips;
- drove dangerously, e.g. while texting;
- were unwilling to take the shortest route;
- overcharged or failed to use the meter properly;
- spoke/behaved inappropriately with passengers;
- failed to appear for pre-arranged bookings;
- lacked sufficient knowledge of streets and locations, including significant landmarks.³

Dissatisfaction with the level and standard of service was even more prevalent in the business and hospitality sectors. (The situation in the hire car industry was quite different with customer satisfaction levels generally high.) Taxi drivers, meanwhile, had their own grievances. Security was a major issue: many drivers had been assaulted or experienced abuse whilst working. Anti-social behaviour fuelled by excessive drinking and drug use played a considerable part and saw drivers subjected to its unpleasant after-effects regularly. The stabbing of a taxi driver in 2008 prompted hundreds of drivers to blockade Flinders Street station, to protest violence against drivers. In response, the government agreed to the mandatory installation of security screens and late-night pre-paid fares.⁴ Other frequent complaints concerned inadequate driver remuneration and benefits.

By 2011, pervasive frustration with the state of taxis prompted the Liberal Government, then led by Premier Ted Baillieu, to announce a wide-ranging, independent inquiry with the goal of introducing significant long-term improvements to customer service, employment conditions, industry competitiveness and integration and efficiency. Although the prospect of a thorough overhaul was welcomed in many quarters, including social service groups, taxi licence holders and other industry players were far less enthused.

Industry overview

According to the Australian Taxi Industry Association (ATIA), there were 35 million taxi trips in Victoria carrying 49 million passengers in 2010.⁵ The average taxi journey was approximately

² 'Setting the scene' Taxi Industry Inquiry, State Government of Victoria, 2011, www.taxiindustryinquiry.vic.gov.au p.6.

³ Adapted from Ibid.

⁴ Dobbin, M. 'Protesting cabbies win security boosts' The Age, 30 April 2008, www.theage.com.au, Accessed: January 2014.

⁵ 'Setting the scene' Taxi Industry Inquiry, State Government of Victoria, 2011, www.taxiindustryinquiry.vic.gov.au p.9.

10km and cost close to \$24⁶ but most trips were considerably shorter; total industry revenue in 2011 was over \$620 million.⁷ Taxis could be hailed by passengers in the street, accessed at designated ranks or booked via phone or internet. By contrast, hire cars were exclusively pre-booked with fares negotiated in advance. At May 2011, there were approximately 3000 operators running just over 5000 cabs.⁸ Each operator required a government-granted licence which stipulated certain conditions and restrictions. The number of licences was strictly limited and new licences were rarely issued, though existing licences did not expire and could be traded. Licence holders were generally not required to drive the taxis themselves, this right could be “assigned” to an operator who might opt to drive the taxi or lease “bail” the taxi to one or more drivers (*Exhibit B*). Over 70 percent of taxi licences were used this way.⁹ The vast majority of operators managed only one or two taxis, though there were a few larger fleets. The government issued three types of licences, each with certain conditions attached, which determined how, when and where taxis could be used. These were:

- *Conventional licences* – this was the most common type of licence (with a standard yellow livery). Taxis with these licences were able to operate 24 hours a day, seven days a week;
- *Peak service licences* – taxis attached to these types of licences were known as “green top” taxis due to their livery. These taxis were only allowed to operate in the metropolitan area between 3pm and 7am, and 24 hours during specified major events; and
- *Wheelchair-accessible taxi (WAT) licences* – taxis with WAT licences were designed for the purpose of transporting people in wheelchairs and were required to give priority to wheelchair bookings. WATs could also be high occupancy vehicles which carry up to 11 passengers when not carrying people in wheelchairs.¹⁰

Each licence was restricted to a particular geographic zone: Metropolitan (metropolitan Melbourne); outer suburban (Frankston and Dandenong); urban (Geelong, Ballarat and Bendigo); and country (all other areas). Drivers were expected to work primarily within their designated areas but could accept pre-bookings from elsewhere. The cost of licences varied markedly, with metropolitan licences being the most expensive. In 2011, these licences had an average secondary market value of more than \$500,000;¹¹ new government-issued metropolitan licences cost just over \$60,000.¹² The average return for licence holders who assigned their licence to operators was \$30,000 per annum.¹³ In addition to licensing costs, operators were also responsible for vehicle maintenance, insurance, driver payments and Network Service Provider (NSP) fees. NSPs (principally Silver Top Taxis and Black Cabs) handled taxi booking and despatch services. All taxis were required to have an NSP affiliate which charged annual fees averaging \$7000.¹⁴

⁶ All currency quoted in Australian dollars.

⁷ ‘Customers First: Draft Report’ Taxi Industry Inquiry, State Government of Victoria, May 2012, www.taxiindustryinquiry.vic.gov.au, p.62.

⁸ *Opcit*, p.15.

⁹ *Ibid*, p.14.

¹⁰ Adapted from *Ibid*.

¹¹ *Ibid*, p.14.

¹² ‘Customers First: Draft Report’ Taxi Industry Inquiry, State Government of Victoria, May 2012, www.taxiindustryinquiry.vic.gov.au, p.62.

¹³ ‘Setting the scene’ Taxi Industry Inquiry, State Government of Victoria, 2011, www.taxiindustryinquiry.vic.gov.au p.14.

¹⁴ *Ibid*, p.16.

In 2011 there were some 15,000 registered, active taxi drivers in Victoria, 12,000 of whom were based in metropolitan Melbourne.¹⁵ Most drivers worked as independent contractors and were typically responsible for their own superannuation and GST payments and were not entitled to sick leave, holiday, nor the same health and safety protections as regular employees. Bailee drivers were required to negotiate their remuneration with operators, usually a 50/50 split of the total fare revenue or an upfront “fixed fee” to rent the cab.¹⁶ Passenger fares including flagfall and time/distance charges were set by government but commercial agreements between bailee drivers and operators were not regulated. The average takings for some drivers were below minimum wage, sometimes as low as \$8 per hour.¹⁷ During recent years the number of temporary and part-time taxi drivers, many of them overseas students, had risen substantially. Industry turnover was high with 1500 – 2000 new drivers required annually.¹⁸

All commercial drivers and passenger vehicles had to meet government mandated standards. In 2011, new metropolitan taxi drivers were required to complete 115 hours of training from a registered training organisation which could also be a Network Service Provider.¹⁹ The Victorian Taxi Directorate (VTD) was responsible for overall industry regulation including administering provisions of the *Transport (Compliance and Miscellaneous) Act 1983*. A branch of the Department of Transport, the VTD’s tasks not only involved managing the licensing and accreditation process but also enforcing regulations, developing policy, overseeing access programs and liaising with different stakeholders, including the public. The VTD had attracted criticism from consumers and some industry participants, both groups feeling that the Directorate failed to serve their interests. The latter believed that the industry was bound by too many regulations that were not uniformly or effectively applied and that the high barriers to entry stifled competition. Similarly, consumers felt that the VTD didn’t do enough to rein in rogue drivers or operators and promote better, more accessible services that fully utilised new technologies.

In announcing the 2011 Taxi Industry Inquiry, Chair Allan Fels signalled his plans to explore the role of the regulator as well as other key actors. He also acknowledged the scale of the task ahead – the industry was very complex and interconnected; many arrangements had been little changed in decades. Previous attempts to overhaul the industry had been piecemeal and strongly resisted, especially by the Victorian Taxi Association (VTA) – the peak body representing taxi-cab drivers, taxi-cab operators and taxi-cab Network Service Providers across the state.

After two years of consultation, submissions and robust debate, the Inquiry made 139 recommendations for change. Said Fels after the Inquiry’s completion: “it is concerning, based on the past form of numerous governments around Australia including Victoria, that the taxi lobby will try to do a deal behind closed doors that puts consumers last. The taxi industry’s time is up – for years they have failed to fix their own problems and their recent efforts to improve are window dressing and a case of simply tinkering around the edges when under pressure from the inquiry.”²⁰

¹⁵ Ibid,p17.

¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ Ibid.

¹⁹ Along with dispatch and training services, NSPs (in Melbourne at least) offered an increasingly broad range of ancillary services including driver training, repairs, financing, interior fit-outs and licence brokerage.

²⁰ Carey, A. ‘Baillieu sits on taxi report.’ *The Age*, 10 December 2012, www.theage.com.au, Accessed: January, 2014.

Reform ire

After two years of consultation, submissions and robust debate, the now Napthine Liberal Government announced its response to the Inquiry in 2013, accepting the majority of the recommendations. The changes to be implemented included a major overhaul of the licensing system. New annual licences would be issued according to market demand²¹ and the fee would vary in line with new zoning arrangements and the type of licence sought. The maximum annual fee was set at \$22,000 and indexed to rise at CPI minus 0.5 per cent (*Exhibit C*). These licences would be transferrable but could not be “assigned” to third parties. Holders of existing perpetual licences would still be able to buy and sell their permits but could not assign them for more than \$22,000 per annum. The Government hoped this “middle path” would allow licence holders (many of whom were retired or held licences as nest eggs) to preserve some asset value whilst opening up the market to more operators. Other changes included:

- increasing the driver’s share of fare revenue to a minimum 55 percent;
- capping the level of service fee for the electronic payment of fares;
- removing obstacles to allow a greater range of pre-booked hire car services;
- introducing an enhanced independent and comprehensive exam for new taxi drivers, similar to “The Knowledge” for London cab drivers.²²

Another major reform involved disbanding the Victorian Taxi Directorate to create the Taxi Services Commission (TSC) with its mission to provide responsive, safe, competitive, efficient and accessible commercial passenger vehicle services. The TSC was set to commence operations in July 2013. Throughout the inquiry, the Victorian Taxi Association (VTA) – particularly licence holders and major players such as Network Service Providers – vigorously opposed the changes, arguing that increased competition would destroy the industry and make conditions worse for drivers. They stepped up their fight in early 2013, holding a protest of approximately 150 drivers and licence holders on the steps of Parliament,²³ launching an advertising campaign (*Exhibit D*) and lobbying MPs directly. The industry found a prominent ally in former Victorian Premier Jeff Kennett who claimed that the reforms were illogical and irresponsible.²⁴ Said one dismayed licensee:

“I am 60, I was looking forward to retirement, now no one will buy my licence and I have a mortgage to pay and the loan on the taxi licence, and will be working seven days a week until the day I die...These changes will destroy a lot of families, the majority of them migrants; Indians, Somalians, Greeks, Italians, Vietnamese and more. I came from India for a better future for my family and I have two children and one grandchild, and the taxi licence was their inheritance. Now all the opportunity, the future for us, is gone. It’s hard for me, there’s so much pressure, I can’t relax and don’t know how I will cope. I live in Mill Park, my house is not a mansion and I am not a millionaire.”²⁵

²¹ Subject to periodic government review. The issue of country licences would have to pass a ‘consumer interest test’.

²² Adapted from: ‘Government Response: Taxi Industry Inquiry Final Recommendations’ State of Victoria, May 2013, www.taxi.vic.gov.au, pp.3-18.

²³ ‘Vic taxi owners protest licence changes’ www.news.com.au, 25 June 2013, Accessed: January, 2013.

²⁴ Carey, A. ‘Samuel on road to shake up taxi standards’ The Age, 9 September, 2013, www.theage.com.au, Accessed: January 2013.

²⁵ Hewitt, S. ‘Fare go: Cabbies protest taxi reforms’ The Northern Weekly, 8 July 2013, www.northernweekly.com.au, Accessed: January 2014.

By contrast, consumers (along with some drivers) were hopeful that the TSC would prevail. However, some weren't prepared to wait. Increased frustration with declining industry standards had led some passengers and operators to form "secondary networks" where the former placed bookings directly with a regular driver or group of drivers via mobile phone. This was permitted under the legislation, though operators still had to be affiliated with a NSP and adhere to the same industry regulations. A range of smartphone apps such as GoCatch had also been developed, connecting customers with nearby taxis, bypassing traditional NSPs. Meanwhile, 2013 saw the arrival of UBER in Melbourne – a smartphone based booking service which allowed clients to order hire-cars for immediate travel. A premium service, so far limited to the airport and metropolitan areas, costs were generally 20 percent higher than taxis.²⁶ Passengers did not pay drivers personally; instead, their pre-registered credit-cards were charged upon completion of their journey. Originating in San Francisco, the service had since spread to 20 cities across the world. In Sydney, UBER had recently expanded its services to include regular cabs.

The Taxi Services Commission

In May 2013, provisions of the *Transport Legislation Amendment (Taxi Services Reform and Other Matters)* Act 2011 came into effect, allowing for the replacement of the VTD by the TSC. Former ACCC chief, Graeme Samuel was appointed chair; alongside him would be two other Commissioners: Merran Kelsall, accounting partner and inaugural Chair of the Public Transport Ombudsman; and Douglas Shirrefs, barrister, economist and company director. On 28 June 2013, the *Transport Legislation Amendment (Foundation Taxi and Hire Car Reforms)* Act was passed which enabled the TSC to implement the Government's reforms. The new TSC comprised 10 divisions (*Exhibit E*) and commenced operations in July 2013. Its key functions included:

- issuing taxi and hire vehicle driver accreditations;
- issuing taxi industry accreditations;
- issuing driving instructor authorities;
- administering the Multi Purpose Taxi Program and country wheelchair accessible taxi subsidy scheme;
- developing policy and reviewing regulations;
- monitoring the industries it regulates to ensure compliance with relevant legislation and regulations;
- liaising and consulting with these industries and with consumers;
- providing business and information technology support to the industries it regulates; and
- implementation of the government supported reforms from the Taxi Industry Inquiry's final report.²⁷

²⁶ Costs depended on the type of vehicle selected.

²⁷ 'About Us' Taxi Services Commission, www.taxi.vic.gov.au, Accessed: January, 2014.

This would be done in accordance with more than eight separate pieces of legislation, including the *Road Safety Act 1986* and the *Transport Integration Act 2010*.²⁸ Although the government and TSC emphasised the fact that it would take several years to deliver substantive change, the Commission was nonetheless keen to start tackling several key objectives relating to the accessibility, quality, safety and variety of services. Restoring public confidence in taxis was a particular priority.

The government indicated how the TSC should carry out its work, supporting the Taxi Inquiry recommendation that, “All regulation affecting the small commercial passenger vehicle industry should be examined to ensure that, as far as possible, it is outcomes-based rather than prescriptive, enabling scope for regulated entities to find the most efficient ways of achieving the outcomes required...”²⁹ The TSC would be required to develop a compliance strategy that:

- is based on transparent risk assessment methodologies;
- can be implemented with available resources and with an acceptable level of residual risk;
- recognises the costs it imposes on regulated entities;
- promotes timely responses and reflects current circumstances;
- is documented and publicised externally to industry and other stakeholders;
- is flexible, graduated and targeted at the highest priority risks posed by non-compliance;
- recognises the capacity and motivation of non-compliant entities to return to compliance;
- signals the seriousness with which it regards the non-compliance.³⁰

Assisting the TSC would be enhanced “information gathering powers, including the requirement for all taxi permit holders to provide data on trips, shifts and fares direct from the taxi-cab to the Commission on a continuous basis, and for Authorised Taxi Organisations to provide specified service delivery data on a regular basis.”³¹ Although the Transport Legislation Amendment (Taxi Services Reform and Other Matters) Act 2011 and the Transport Legislation Amendment (Foundation Taxi and Hire Car Reforms) Act 2013 covered most of the agency’s expanded role and powers, further legislation would be passed as necessary over the next months and years.

Commencing from his appointment, TSC Chair, Graeme Samuel made clear public statements that the industry needed to lift its game. “What we do know is that this and other reforms are all about having more knowledgeable and higher quality drivers for the public. Improved driver standards will build respect for drivers and a greater willingness for the public to use taxi services...Whether it’s the consumer being able to choose a taxi at the rank by its distinguishing colour or being able to book and pay the fare using an app, the industry will have to innovate to thrive...If the industry ignores the opportunities of this reform package, they will languish.”³² He also encouraged the public to report driver misconduct via the TSC which had a dedicated call centre to process complaints along with general inquiries (*Exhibit E*). This coincided with

²⁸ Ibid.

²⁹ ‘Government Response: Taxi Industry Inquiry Final Recommendations’ State of Victoria, May 2013, www.taxi.vic.gov.au, p.28.

³⁰ Adapted from Ibid.

³¹ Ibid.

³² Carey, A. ‘Samuel on road to shake up taxi standards’ The Age, 9 September, 2013, www.theage.com.au, Accessed: January 2013.

reports that some taxi drivers were preying on intoxicated or cognitively impaired passengers; taxi authorities were receiving almost one report per week of sexual harassment or assault.³³

"What we're going through at the moment is that passengers ... have lost respect for taxi drivers," Samuel said during a radio interview, "The only way taxi drivers will get that back is to become better-trained, and the rogue drivers get out of the system. We've got to turn around literally decades of bad regulation."³⁴ The TSC website listed the range of infringements and penalties applicable to taxi services from July 2013, such as failing to adjust the heating in a vehicle. Fines ranged from one to a maximum 1200 penalty units or \$144 to \$173,232.³⁵

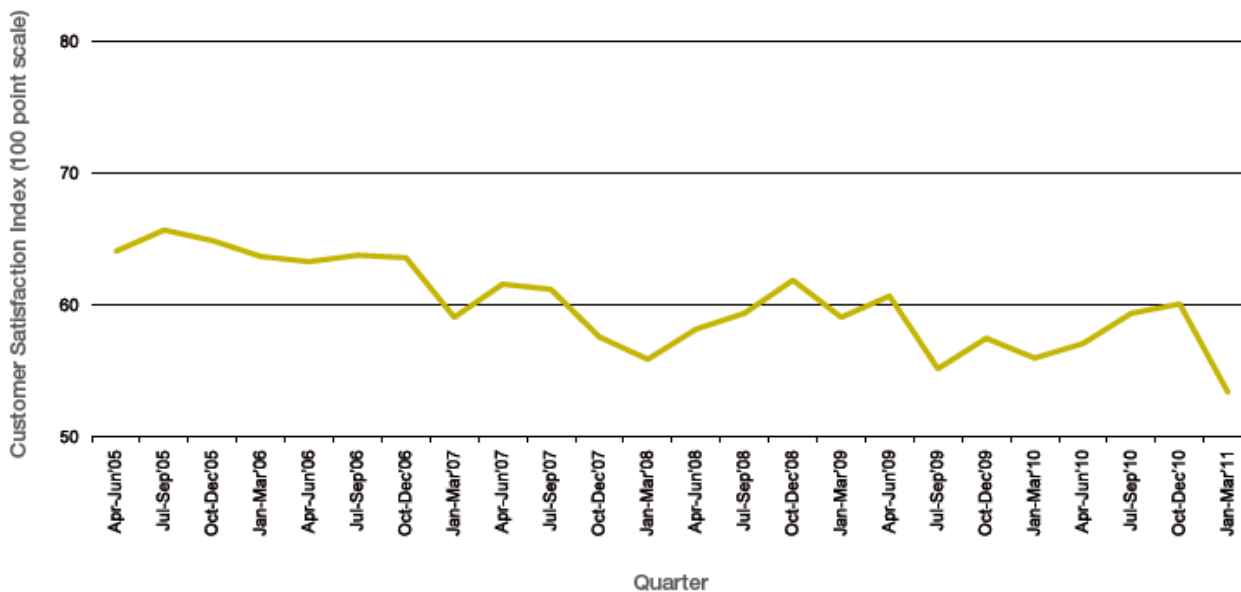
³³ Silvester, J. Cabbies prey on women, *The Age*, 13 September, 2013, www.theage.com.au, Accessed: January, 2014.

³⁴ Cram, M. 'Dob them in: Taxi Commissioner' 3AW Blog, 7 November 2013, www.3aw.com.au. Accessed: January 2014.

³⁵ 'Automatic indexation of fees and penalties' Taxi Services Commission, www.taxi.vic.gov.au, Accessed: January 2014.

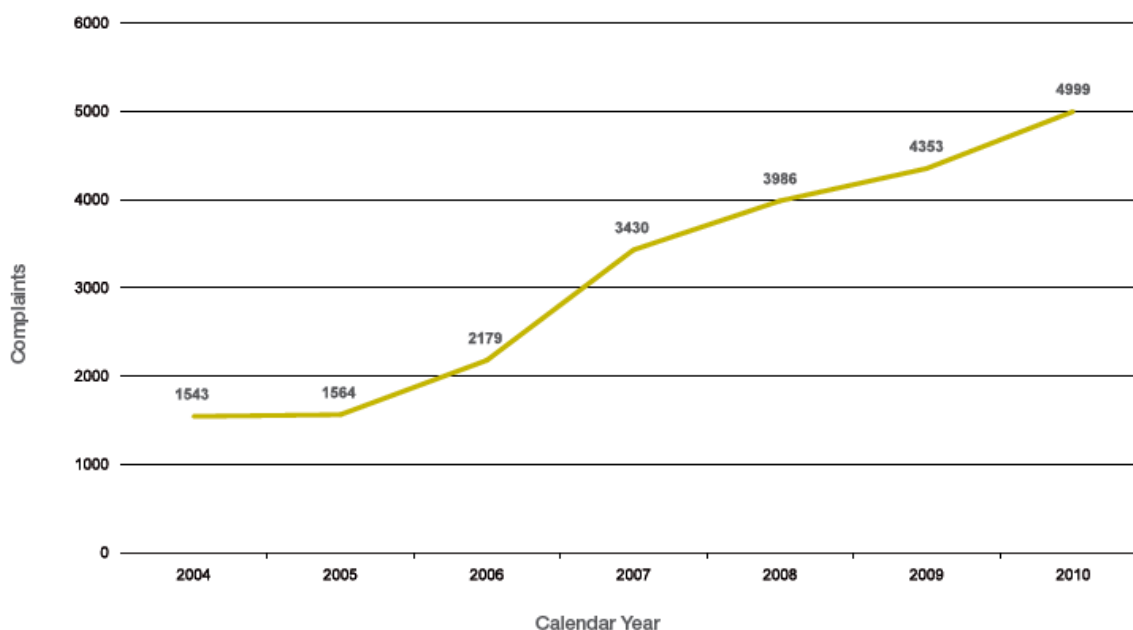
Exhibit A: Customer satisfaction levels and consumer complaints

Overall Customer Satisfaction with Taxi Services



(Source: Wallis Consulting Group Pty Ltd Customer Satisfaction Monitor)

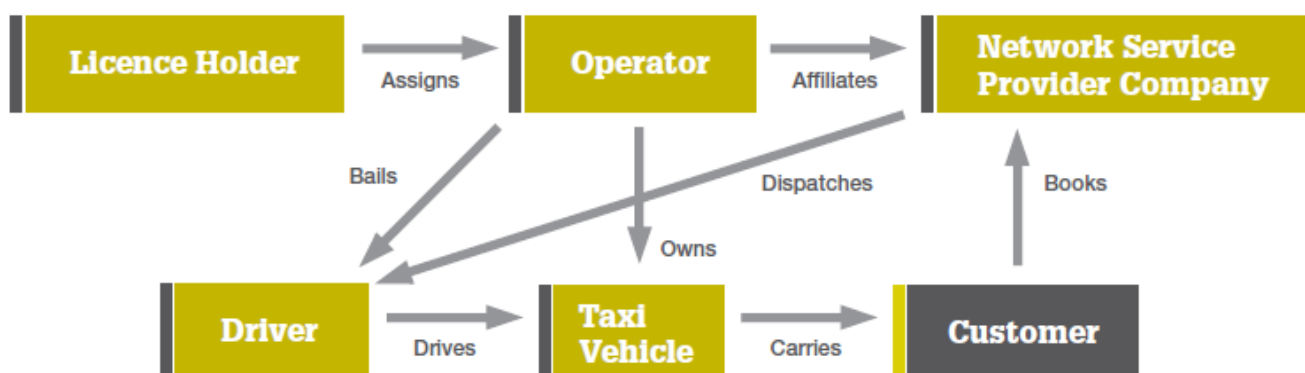
Complaints Received by Victorian Taxi Directorate



(Source: Victorian Taxi Directorate)

Source: 'Setting the scene' Taxi Industry Inquiry, State Government of Victoria, 2011, www.taxiindustryinquiry.vic.gov.au, p.7.

Exhibit B: Roles of key industry players



Source: 'Setting the scene' Taxi Industry Inquiry, State Government of Victoria, 2011, www.taxiindustryinquiry.vic.gov.au, p.15.

Exhibit C: New taxi licensing and zoning arrangements

Zone	Zone 1: Metropolitan	Zone 2: Urban and large Regional	Zone 3: Regional	Zone 4: Country
Licence fee	Conventional: \$22,000 WAT vehicles: \$18,400	Conventional: \$17,000 WAT vehicles: \$13,400	Conventional and WAT vehicles: \$11,000	Conventional and WAT vehicles: \$3,400

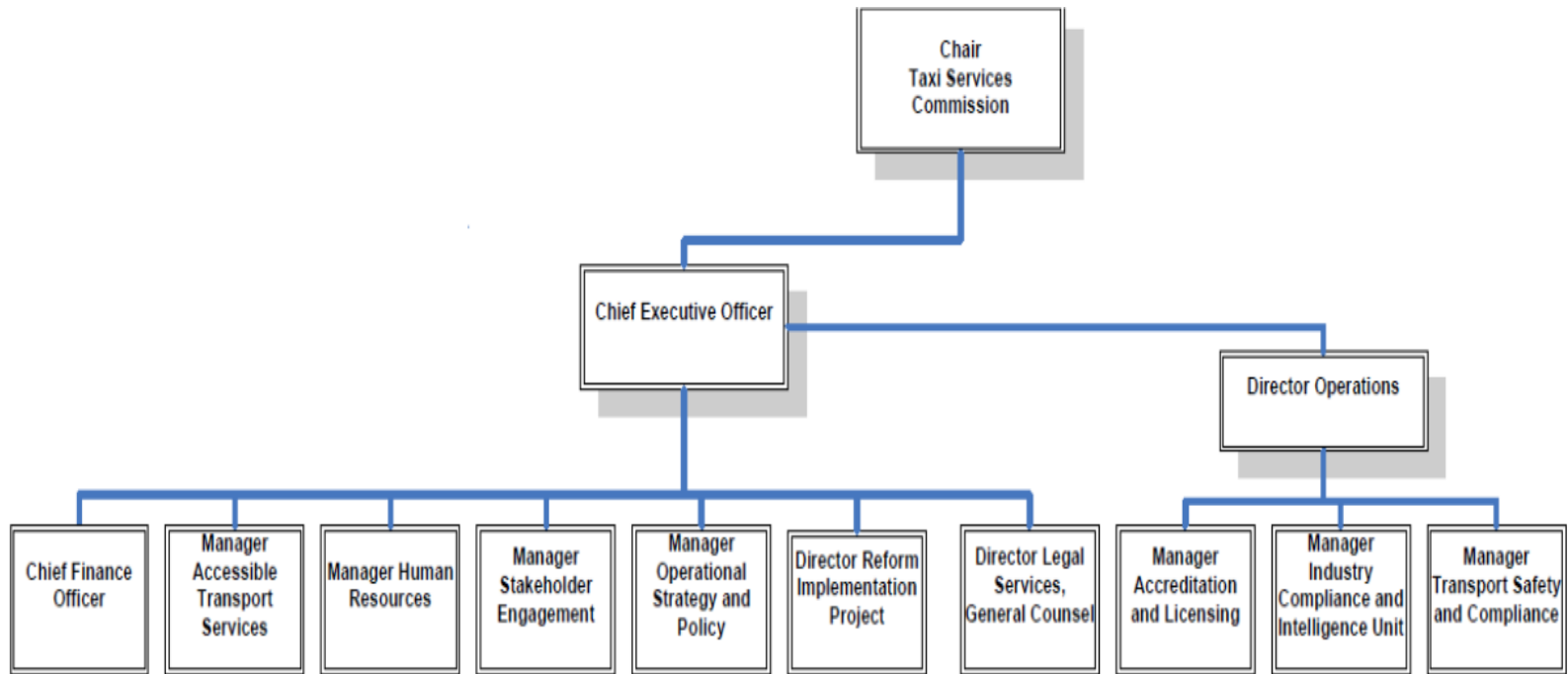
Source: 'Government Response: Taxi Industry Inquiry Final Recommendations' State of Victoria, May 2013, www.taxi.vic.gov.au, p.9.

Exhibit D: Victorian Taxi Association Newspaper Advertisement, 24 June 2013.



Source: Victorian Taxi Association, www.victaxi.com.au, Accessed: January, 2014.

Exhibit E: Taxi Services Commissioner Organisation Chart and Divisional Roles, July 2013



Roles and responsibilities

Corporate Services

Corporate Services is responsible for corporate services including financial management, risk management, business planning, contract services, IT services and records management.

Stakeholder Engagement

Stakeholder Engagement is responsible for building and strengthening the TSC's reputation with its internal and external stakeholders. It does this through the media, correspondence, ministerial briefings, possible parliamentary questions, the TSC website, various industry publications, and through liaison with industry stakeholders.

The TSC Call Centre sits in the Stakeholder Engagement section and is responsible for the managing incoming calls. The Call Centre plays an important role in dealing with the public and industry and directing enquiries to the relevant TSC sections, as well as other customer service functions.

Operational Strategy and Policy

Operational Strategy and Policy is responsible for implementing the State Government's policy direction and regulatory requirements while promoting innovation, improvement, financial sustainability and transparency within the taxi, hire vehicle and driving instructor industries.

The section is responsible for preparing discussion/option papers, correspondence, project briefs and providing input into the development of legislation and regulations.

Accessible Transport Services

Accessible Transport Services (ATS) is responsible for programs and issues related to taxi users with a disability. It administers the Multi-Purpose Taxi Program (MPTP) which provides subsidised taxi travel to people with severe and permanent disabilities, as well as administering the medical eligibility component for the Access Travel Pass and the Wheelchair/Scooter Travel Pass.

ATS also engages with the disability sector to ensure the views of people with a disability are heard in the design and implementation of taxi policy and administration.

Human Resources

Human Resources (HR) looks after TSC's people, maintaining a fair, respectful and capable workforce. HR provide advice and support to TSC employees about issues such as pay, working conditions, leave entitlements and other work arrangements.

Implementation Reform Team

The Implementation Reform Team is responsible for the oversight and successful implementation of the 138 Taxi Industry Inquiry supported recommendations in partnership with TSC business units.

Deputy General Manager Legal Services

Legal provides a broad range of legal and legislative advice, law enforcement, risk management and government services for the TSC.

Accreditation and Licensing

Accreditation and Licensing administers the accreditation of commercial passenger vehicle drivers, taxi operators, taxi licence holders and network service providers. The section also approves the issue of commercial passenger vehicle licences and the transfer and assignment of existing licences and is responsible for issuing driver instructor authorities.

Industry Compliance and Intelligence

The Industry Compliance and Intelligence Unit (ICIU) has four primary functions: audit, investigations, complaints management and business intelligence.

The Audit team audits taxi operators, network service providers and licence holders to ensure compliance with the taxi-cab industry accreditation Business and Service Standards and Regulations. The investigations team investigates allegations involving fraudulent or other misconduct by accredited persons within the industry. The Complaints Management Team manages all taxi, hire car and driving instructor complaints received by the TSC. Complaints are investigated and, where appropriate, actioned for further compliance action. The Business Intelligence Team extracts and analyses data and intelligence relating to the industries regulated by the TSC.

Transport Safety and Compliance

Transport Safety and Compliance (TS&C) manages and implements compliance activities to regulate the taxi, hire vehicle and driver instructor industries.

TS&C includes Transport Safety Officers (TSOs) who conduct on-road activities to achieve industry compliance, including targeted interventions, joint operations, covert activities and directed inspections.

The section has a strong focus on compliance with vehicle safety and safety initiatives such as driver protection screens and taxi safety cameras.