

Submission on CPVV's draft monitoring, compliance and enforcement policy

Please indicate your level of agreement with the following statements:

The policy adequately promotes compliance with, and enforcement of, industry laws. - Agree

The policy adequately sets out proportionate, cost effective and efficient options for monitoring and promoting compliance with, and enforcement of, industry laws. - Neither agree nor disagree

The policy adequately sets out how CPVV will use those options to monitor and promote compliance with, and enforcement of, industry laws. - Agree

The policy provides appropriate guidance on the measures to be adopted by the regulator to promote compliance with and enforcement of the industry laws. - Disagree

Please explain your ratings and provide suggestions for improving the policy.

Policy seems to be to adequate if effectively implemented and actioned. However, there is a lack of detail with regards to actual enforcement activities. While 'shared responsibility' is an important and prominent part of the policy approach, it must still be acknowledged that this concept does not absolve CPVV and its fundamental role of a regulator - to make rules and ensure they are followed. The policy does not adequately explain how CPVV will identify ride share vehicles so as to enforce the regulations. Taxis are easily identifiable, ride share vehicles are not. Number plate recognition technology should introduced to assist CPVV Officers and Police Officers in enforcing the law.

The policy provides appropriate guidance on CPVV's exercise of its:

Monitoring and compliance powers - Agree

Investigation powers - Agree

Enforcement powers - Agree

Please explain your ratings and provide suggestions for improving the policy.

The policy explains the powers at the disposal of CPVV. A key indicator of success will be how CPVV effectively uses these powers, not what they are as such.

The policy provides appropriate guidance on CPVV's exercise of powers under the following sections of the Road Safety Act 1986 by authorised officers or the regulator; and in relation to commercial passenger vehicle services:

s13- Power to inspect motor vehicles and trailers - Neither agree nor disagree

s14(1) - Defective vehicles - Disagree

s84ZY - Power to inspect motor vehicles - Disagree

s77 - Power to prosecute - Disagree

s88 - Traffic infringements - Disagree

Please explain your ratings and provide suggestions for improving the policy.

The policy is light on detail in this respect. It does not explain in any detail how these powers will be used or when. The policy does not explain how a balance will struck between the "shared responsibility model" and top down enforcement powers like those outlined above.

General feedback

Upload your submission to this consultation.

No file specified

What is your interest in the consultation?

Booking service provider

My submission

can be made public, but keep my identity and contact details confidential

Are you happy to be contacted regarding your submission for any of the following?

to provide further or clarifying information; to receive information on how my submission was considered; to receive information on progress of the policy

Please provide your email address to receive confirmation of your submission

[REDACTED]

CPVV Privacy Statement

Commercial Passenger Vehicles Victoria (CPVV) is committed to protecting personal information provided by you in accordance with the principles of the Victorian privacy laws.

The personal information you provide as a result of making this submission will not be circulated outside of CPVV unless you have included personal information in your submission and have consented to your entire submission being made public. In addition, the only purpose for which CPVV will use your personal information is to contact you about your submission and the final policy, where you have indicated that you can be contacted for this purpose.

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