

Safety Management System (SMS)

ACT Cabs Pty Ltd

Version 1.5



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Introduction & Objectives

This document details how ACT Cabs identifies, records and manages work-related health & safety risks associated with driving a taxi.

This document should be used as a guide for taxi drivers, vehicle owners and other workers to assess, monitor and address various work, health and safety matters whilst driving a taxi or working at or with ACT Cabs Pty Ltd.

This document applies to all participants in the point to point transport industry including taxi drivers, vehicle owners and affiliated providers to ensure the safe operation of taxis.

As a service provider, ACT Cabs abides with the *Point to Point Transport (Taxis and Hire Vehicles) Act 2016* (NSW) and the *Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017* (NSW) for passenger services provided under its NSW Government authorisations and the *Road Transport (Public Passenger Services) Act 2001* (ACT) and the Regulations for services provided under its ACT Government accreditation.

Endorsement

This policy and the information herein has been endorsed by senior management of ACT Cabs Pty Ltd, including the Senior Manager and Managing Director of ACT Cabs.

Consultations in the development of this policy

The following stakeholders of the company were approached in developing this policy:

- I. Selected taxi drivers operators
- II. ACT Cabs Administration staff members
- III. Transport for NSW
- IV. Stipulations in the *Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017* (NSW)
- V. Stipulations in the *Road Transport (Public Passenger Services) Regulation 2002* (ACT)

Safety Management System (SMS)

The following Statement of Commitment and the Implementation of Policy Commitment provide the overarching direction for ACT Cabs in pursuit of workplace health and safety outcomes. These commitments are as follows:

I. Statement of Commitment

ACT Cabs is committed to providing a workplace that enables all work activities to be carried out safely. We will take all reasonably practicable measures to eliminate or minimise risks to the health, safety and welfare of workers, drivers, customers, contractors, visitors, and anyone else who may be affected by our operations.

We are committed to complying with the *Work Health and Safety Act 2011* (the Act). We will also comply with any other relevant legislation, applicable Codes of Practice and Australian Standards as far as possible.

ACT Cabs's WHS Policies and Procedures set out the safety arrangements and principles which are to be observed by ACT Cabs and its workers to ensure compliance with the WHS Act and to provide appropriate mechanisms for continuing consultation and management of WHS matters.

II. Implementation of Policy Commitment

ACT Cabs is committed to ensuring, so far as is reasonably practicable, the health and safety of its workers (employees, drivers, customers, contractors) while they are at work, and that the health and safety of other persons (e.g. visitors) is not put at risk from our operations. This will be achieved by:

- Providing and maintaining a healthy and safe work environment through the implementation of safe work practices, safe systems of work and the provision of safe work equipment.
- Ensuring that workplaces under the control of ACT Cabs are safe, without risk to health, and have safe means of access and egress.
- Routinely consulting in order to maintain effective and co-operative relationships between ACT Cabs and its workers, and with other duty holders, on health and safety matters in the workplace.
- Reviewing, via appropriate mechanisms, the effectiveness of the safety measures taken.

III. ACT Cabs's commitment to providing safe and healthy working environments for ACT Cabs workers includes:

- Providing relevant, up-to-date WHS information to all workers on matters such as workplace safety and their responsibilities.
- Providing assistance in WHS matters where necessary.
- Providing instruction and/or training in work processes where appropriate (e.g. in the ACT Cabs Driver Training Modules).
- Developing and implementing strategies which include workplace assessment, hazard identification, and appropriate remedial action to eliminate or control hazards.
- Implementing and maintaining appropriate information and reporting methods.

IV. Maintaining, overseeing and implementing the Safety Management System (SMS)

- The Senior Manager of the ACT Cabs Administration Office and delegated authorised officers of the company shall be responsible for maintaining and implementing the Safety Management System (SMS).
- The Managing Director of ACT Cabs shall be responsible for overseeing the Safety Management System (SMS).

Roles and Responsibilities

ACT Cabs is a Booking Service Provider as well as a Taxi Service Provider and is responsible for :

- Maintaining the Safety Management System
- Minimise the risk associated with operating a taxi
- Minimise risks to ACT Cabs staff members
- Implementing an ongoing risk identification process
- Investigate and action potential and reported hazards

Affiliated providers (taxi owners and drivers) are responsible for:

- Complying with ACT Cabs Safety Management System
- Complying with ACT Cabs By-Laws
- Ensuring vehicles are roadworthy and safe to operate at all times
- Ensuring vehicles are registered and insured
- Reporting risks, incidents, hazards
- Timely reporting of notifiable occurrences

ACT Cabs Risk Register

The Risk Register is used to record identified industry hazards as well as to provide an action plan in case of an occurrence.

The risk register is monitored and updated via means of a constant consultation process which includes:

- Providing frontline workers with a safe platform to report incidents
- Reminding affiliated providers of their obligations to report incidents
- Monitoring complaints where risk is identified

The ACT Cabs Risk Register and Risk Matrix is available below:

ACT Cabs Risk Register

Point to Point Transport (Taxis and Hire Vehicles) Act 2016 (NSW)
Clause 7 of the Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017 (NSW)
Road Transport (Public Passenger Services) Act 2001 (ACT)
Road Transport (Public Passenger Services) Regulation 2002 (ACT)

Updated: 1 January 2024

Instructions: Authorised staff must regularly check and update this Risk Register to ensure it stays up to date and compliant with ACT Cabs' current operating environment

Hazard / Risk	Likelihood	Severity / Impact / Consequence	Risk Rating	Recommended Controls	Responsible
Accident with a Kangaroo	Moderately Likely	Moderate Consequence - Damage to the vehicle and possible injury to driver or passengers	Low	<ol style="list-style-type: none"> 1. Be aware of Kangaroo prone areas in the ACT and surrounding NSW regions. 2. Drive slowly in Kangaroo prone areas and well below the speed limit. 	Driver
Driver distraction	Moderately Likely	Major Consequence - could result in death or permanent injury (driver, passengers, bystanders)	High	<ol style="list-style-type: none"> 1. Ensure all devices (where possible) are off / away whilst conducting a passenger service. 2. As applicable, ensure passengers are seated where they are unlikely to be a distraction. 	Driver

<p>Violence against taxi drivers (Includes Fare Evasion, Intoxicated / difficult customer, Dealing with other road users, Robbery and Road Accidents)</p>	<p>Low</p>	<p>Consequence - could result in serious injury or death (driver, passengers, bystanders)</p>	<p>High</p>	<ol style="list-style-type: none"> 1. Don't argue or fight back when confronted with an intoxicated or difficult customer. Stay calm and help to diffuse the situation while being polite. 2. If before the fare you think a passenger may be abusive, then don't accept the fare. Give a polite excuse and drive off. 3. If during the fare you feel unsafe due to passenger behaviour, you have the right to drive them to a Police Station, or to call the Police. 4. Use the duress alarm to alert ACT Cabs call centre 5. Don't keep large amounts of cash in the vehicle, or within sight. 6. Ask passengers to prepay or leave a deposit 7. Do not hold passengers or their personal items, use force to get money or chase fare evaders 8. Report incident to police and taxi network 9. Following an accident, drivers should do a self-assessment, especially if feeling pain around the neck, back and torso areas before exiting the vehicles. If injured, call emergency services on 000 immediately 10. Check the well-being of the other occupants in the vehicle 11. Where the accident results in a fatality or injury contact emergency services immediately 	<p>ACT Cabs Administration Office / Driver</p>
<p>Violence against passengers or members of the public</p>	<p>Low</p>	<p>Consequence - could result in serious injury or death (driver, passengers,</p>	<p>High</p>	<ol style="list-style-type: none"> 1. Don't argue or fight back when confronted with an intoxicated or difficult customer. Stay calm and help to diffuse the situation while being polite. 2. If before the fare you think a passenger may be abusive, then 	<p>ACT Cabs Administration Office / Driver</p>

		bystanders)		<p>don't accept the fare. Give a polite excuse and drive off.</p> <p>3. All taxis have a security camera for passenger and driver safety.</p> <p>4. All drivers are police checked and hold a Working With Vulnerable People Registration (WWVP Check).</p>	
<p>Psychological risks for taxi drivers (eg effect of witnessing a fatal car accident)</p>	Moderately Likely	<p>Major Consequence - may affect mental health and ability to provide passenger services</p>	Medium	<p>1. Contact counselling services.</p> <p>2. Take time to ensure mental well-being before driving again.</p>	Counsellor / Driver
<p>Soliciting And Touting by taxi drivers</p>	Unlikely	<p>Major Consequence - Lose ability to conduct passenger services under the Point to Point legislation</p>	Medium	<p>1. Do not solicit or tout passengers. This is illegal and will attract penalties.</p> <p>2. Soliciting or touting passengers is also against the rules of the ACT Cabs By-Laws.</p> <p>3. ACT Cabs Administration will suspend and/or fine any taxi driver that solicits or touts members of the public.</p>	Driver
<p>Passanger Pick up and Set Down</p>	Moderately Likely	<p>Major Consequence - could result in death or permanent injury (passengers)</p>	High	<p>1. Only collect passengers from a location where it is safe for them to enter the vehicle.</p> <p>2. Never pick up or set down a passenger in the middle of the road.</p> <p>3. Be aware of hazards on the side of the road and avoid them when picking up or setting down a passenger.</p> <p>4. Be aware of environmental factors whilst picking up and setting down a passenger (such as slippery surfaces when it is raining).</p> <p>5. The law permits drivers to drop-off a customer with a significant disability that affects the person's mobility in a no-stopping area where it is safe to do so. This may only occur if the customer has</p>	Driver

				a significant disability that affects the person's mobility and the customer makes this request to aid them with getting to their destination. 6. Align your vehicle in a position where it is safe and easy for the passenger to enter or exit the vehicle.	
Transporting Vulnerable Passengers (VPs)	Moderately Likely	Major Consequence - could result in death or permanent injury (VP)	High	<ol style="list-style-type: none"> 1. When possible, have an awareness of the needs of VPs. 2. Ensure additional care is taken collecting and dropping off VP. 3. Assist the VP (without compromising your own safety). 4. Ask the VP whether they require additional assistance. 	ACT Cabs Administration Office / Driver
Fatigue for taxi drivers	Highly Likely	Major Consequence - could result in death or permanent injury (driver, passengers, bystanders)	High	<ol style="list-style-type: none"> 1. Ensure that a reasonable amount of driving each day is not exceeded. 2. Take regular breaks throughout the day. 3. Ensure that you do not work too many days in a row without having 24 hours off. 	Driver Driver Driver
Drugs & Alcohol Policy	Unlikely	Major Consequence - could result in death or permanent injury (driver, passengers, bystanders)	Medium	<ol style="list-style-type: none"> 1. Do not drive whilst under the influence of drugs or alcohol. 2. Ensure any new medications are checked for side effects before driving. 3. Do not drive whilst under the effect of medications which cause drowsiness. 4. Ensure adequate time has passed before driving after drinking alcohol. 	Driver
Covid 19	Moderately Likely	Moderate Consequence - could result in driver getting sick or making others sick.	Medium	<ol style="list-style-type: none"> 1. Good hygiene (wash hands often, use hand sanitiser) 2. Wear mask where required 3. Encourage customers to sit at the back and wear mask 4. Clean and disinfect vehicle regularly 5. If unwell, stay home 6. Follow ACT Cabs Covid-19 policy 	Driver

Wheelchair Accessible Taxi	Highly Likely	Major Consequence - could result in death or permanent injury (driver, passengers, bystanders)	High	<ol style="list-style-type: none"> 1. Ensure only qualified drivers who have completed TLIC2040 Provide wheelchair-accessible taxi services to passengers with disabilities course are allowed to work on WATs 2. Ensure WAT equipment is fitted by an accredited installer and an engineering certificate provided 3. Utilise safe practices when loading, restraining and unloading a person in a wheelchair 	ACT Cabs Administration Office / Affiliated provider / Driver
Musculoskeletal Disorders	Moderately Likely	Moderate Consequence - drivers could develop Musculoskeletal disorders due to a work-related injury or develop over a long period of time.	Medium	<ol style="list-style-type: none"> 1. Exercise regularly to strengthen back and neck muscles 2. Stretch regularly during shift 3. Use ergonomic lumbar support where necessary 4. Use safe techniques when lifting luggage 5. Avoid lifting heaving items 	Driver
Weather Conditions	Highly Likely	Major Consequence - could result in death or permanent injury (driver, passengers, bystanders)	High	<ol style="list-style-type: none"> 1. Reducing speed, especially in wet weather 2. Turn on headlights on low beam 3. Using the demister function to clear condensation on the windscreen 4. Allowing extra distance with the vehicle in front for safer braking 5. Avoid driving in water puddles 	Driver
Animal Strikes (other animals)	Likely	Moderate Consequence - Damage to property and injury to people	Medium	<p>Be aware – animals are more active near nature parks and harder to see at sunrise, sunset and at night. Reduce your speed – slow down when you see animal warning signs Stay alert – animals are unpredictable, so expect the unexpected Brake safely – always apply your brakes in a controlled manner Never swerve – it is safer to hit an animal than swerve and lose control of your vehicle</p>	Driver

On board fire	Unlikely	Major Consequence - could result in death or permanent injury (driver, passengers, bystanders)	High	<ol style="list-style-type: none"> 1. Remain calm 2. Assist all passengers to exit the vehicle calmly and quickly 3. The driver must exit the vehicle 4. Assemble with any passengers at a safe assembly point 5. Alert the Fire Department by dialling 000 6. Notify ACT Cabs 	Driver
Failure to maintain current third party liability insurance policy	Likely	Moderate Consequence - Damage to property and financial liability	Medium	<ol style="list-style-type: none"> 1. Ask for Third Party Property Damage (TPPD) insurance upon commencement of contract with taxi operator. 2. Obtain a current TPPD insurance certificate during each fleet inspection, to ensure ongoing cover and compliance with the requirement. 3. Inform insurance broker to notify ACT Cabs of any lapse in policy, thereby prompting ACT Cabs to suspend the vehicle until evidence of compliance is provided. 	Driver, Operator, ACT Cabs, Insurance Broker
Failure to maintain vehicle registration	Likely	Moderate Consequence - Damage to property, people and financial liability	Medium	<ol style="list-style-type: none"> 1. Ask for registration document (for NSW plated vehicles) upon onboarding 2. Set up registration renewal reminders on SmartMove that are automatically sent to drivers each day when registration is about to expire. 3. Run daily registration checks on vehicles to ensure vehicles are insured. 4. Suspend any vehicle from the dispatch system that fails to maintain registration. 	Driver, ACT Cabs, Insurance Broker

Risk Management

1. Driver Health

Taxi drivers must take necessary measures to maintain their health and well-being due to the long inactive working hours nature of operating a taxi. As general advice,

drivers should avoid or reduce fatty, salty or sugary foods which are foods known to provoke lethargy. A high fibre and high protein diet will give drivers more energy over a longer period. Physical activities are encouraged during off days.

Drivers must ensure they are getting enough sleep and avoid going on duty if fatigued.

As part of the onboarding process, drivers are required to declare health issues and get a medical clearance where required. Drivers are responsible for disclosing changes in their health that affect their fitness to drive.

While operating a taxi, there are many factors that may lead to psychological injuries including depression, PTSD, anxiety and other mental health issues.

ACT Cabs provides mitigation information on how to deal with difficult customers, use of duress switches, CCTV cameras, report incidents and seek assistance in the event of a serious incident.

Anyone struggling with mental health has access to the following resources in Canberra.

Access Mental Health: 1800 629 354

Lifeline Canberra: 13 11 14

Beyond Blue: 1300 224 636

MensLine Australia: 1300 789 978

Procedure for a new health condition arising during active engagement

If a taxi driver observes a new health condition during the course of their engagement with ACT Cabs, they are required to declare the health condition to ACT Cabs Administration and will need to provide reasonable assurance that they are fit to drive a public transport vehicle. This may be achieved in the form of a medical certificate from a registered Australian health practitioner.

If you are in a life-threatening situation, call 000 immediately.

2. Musculoskeletal Disorders

Musculoskeletal disorders are any injuries that affect bones, muscles, ligaments, nerves or tendons resulting in pain. Musculoskeletal disorders may arise due to a work-related injury or develop over a long period of time.

To avoid musculoskeletal disorders, drivers should:

- Exercise regularly
- Strengthen back and neck muscles
- Stretch regularly
- Use ergonomic lumbar support where necessary
- Use safe techniques when lifting luggage
- Avoid lifting heaving items or seek assistance when lifting heavy items

3. Fatigue

Fatigue driving occurs when a driver is too fatigued or sleepy to stay alert making them less aware of their surroundings. Driving while fatigued is a threat to drivers, passengers and other road users that may lead to serious consequences.

Drivers are responsible for managing their own fatigue levels. This includes not starting their shifts if too fatigued, having regular breaks during a shift, stretching regularly and ceasing work until sufficiently rested.

3.1 Shift hours duration restriction

As part of driver fatigue control, ACT Cabs has implemented shift restrictions where a driver cannot be on duty for more than 14 hours within a 24-hour period. The process is listed below:

1. In a 24 hour period, a taxi driver is not allowed to be logged in for more than 14 hours;
2. In a 24 hour period, a taxi driver must take a minimum 7 hour break;
3. To be counted as a 'break' on the system's timer, the driver must be 'Logged out'. Setting the SmartMove status to 'Unavailable' or 'Out of car' will not be counted as a 'break' on the system's timer;
4. To be counted as a 'break' on the system's timer, the break must be a minimum of 15 minutes;
5. This setting will be set to "Enforce" on SmartMove's software system;

Thereby, any driver who has remained logged in for a period of 14 hours or more, will be automatically logged out by the SmartMove system until a break period of 7 hours has been achieved.

- I. **Maximum shift times:** Drivers are not permitted to drive shifts that are longer than 14 hours within a 24 hour period. The SmartMove MDT will automatically log out any driver who works longer than 14 hours.

- II. Minimum break time:** The system will only enable a driver to log back in once they have taken a 7 hour break within a 24 hour period.

- III. Secondary employment:** Drivers must declare any form of secondary employment in writing to ACT Cabs Administration using the approved form. If you are of the impression that your secondary employment will impact your driving ability, you must not drive.
 - A. Effects of secondary employment:** Secondary employment has the potential to cause excessive or dangerous levels of fatigue. Therefore, a taxi driver must not drive if they are of the understanding that secondary employment may adversely affect their engagement as a taxi driver with ACT Cabs. As an alternative, the taxi driver must adequately manage their fatigue (e.g. by way of adequate rest) to ensure their secondary employment does not adversely affect their engagement as a driver with ACT Cabs.

- IV. Maximum number of work days:** ACT Cabs permits drivers to work seven days a week (should they wish to do so), on the condition that they are not fatigued and can adequately manage their fatigue. ACT Cabs highly recommends drivers to take at least one day off per week, for the purpose of rest and recovery. Any driver found driving whilst fatigued or in an unsuitable state of mind will be the subject of disciplinary action as per the rules of the ACT Cabs By-Laws and the Code of Conduct.

3.2 Methods to manage fatigue:

- I.** Take a break during shifts;
- II.** Get a regular sleeping pattern;
- III.** Be aware of body signs e.g. heavy eyelids, drooping head, lack of concentration, restlessness, slow reaction times;
- IV.** Get out of the car, walk around, take deep breaths;
- V.** Eat a healthy diet and avoid excessive takeaway foods.

4. Driver Fitness Declaration

During onboarding and as part of its ongoing monitoring process, ACT Cabs requires that its affiliated drivers complete a Driver Fitness Declaration which includes:

- **Health Declaration**

- This ensures drivers don't have health issues that may affect their fitness to drive. Any positive declaration requires a medical assessment and clearance from a medical doctor.

- **Secondary Employment Declaration**
 - Secondary employment contributes to fatigue and as such drivers must declare any secondary employment or commitment that may affect their fitness to drive. Drivers are required to have at least 7 hours rest between shifts.

- **Change in circumstances**
 - Any change in circumstances that may affect a driver's fitness to drive must be reported. This may include a temporary or permanent change in a driver's health, personal commitments or employment.

This is a paper form drivers have to complete during onboarding and every 12 months after.

5. Driving under the influence (Drugs and Alcohol)

I. ACT Cabs Drugs and Alcohol Policy

Drivers must familiarise themselves with the ACT Cabs Drugs and Alcohol Policy available publicly on the ACT Cabs website here:

<https://www.actcabs.com.au/drugs-alcohol-policy.html>

II. Driving under the influence

In the ACT and NSW, it is illegal to operate a motor vehicle while under the influence of drugs and/or alcohol. This includes legal prescription and over the counter medicines that can affect driving fitness.

Drivers must not drive a taxi if they are under the influence of drugs or alcohol and must not drive until zero-blood alcohol and drug reading is reached. Drivers must not drive after taking medications that may cause drowsiness.

Driving under the influence affects a driver's ability to stay alert making them less aware of their surroundings and is a threat to drivers, passengers and other road users that may lead to serious consequences.

Drivers are responsible for managing their drugs and alcohol consumption and must not drive a taxi if they are under the influence of drugs or alcohol, until zero-blood alcohol and drug reading is reached.

Taxis are considered a public place and as such passengers must not be allowed to consume or carry alcohol and illicit drugs inside the vehicle's cabin. If carrying alcohol, the container must be sealed and kept in the boot of the vehicle.

III. Support options

Drivers struggling with addiction are encouraged to discuss with a health professional or a drug and alcohol service. The organisations below can also assist:

- Canberra Health Services: www.canberrahealthservices.act.gov.au
- Canberra Alliance for Harm Minimisation and Advocacy (CAHMA): www.cahma.org.au
- Directions Health Service: www.directionshealth.com
- Karralika Programs: www.karralika.org.au
- Canberra Recovery Services: www.salvationarmy.org.au
- Toora Women Inc: www.toora.org.au
- Lifeline: www.lifeline.org.au

If you are in a life-threatening situation, call 000 immediately.

IV. Reporting obligations for taxi drivers

The ACT Cabs Drugs and Alcohol Policy stipulates that any taxi driver who is the subject of a loss of points on their driver licence or a fine, penalty or court action due to driving under the influence (DUI) must report the matter in writing to ACT Cabs Administration.

The report must be made in writing by email to info@actcabs.com.au and include the following:

- I. Your full name
- II. Your driver licence number
- III. Details of the incident and the offence
- IV. Evidence of assurance that you continue to hold a public vehicle driver licence (taxi licence) and remain eligible to drive a taxi under the *Road Transport (Public Passenger Services) Act 2001* (ACT) and the *Point to Point (Taxis and Hire Vehicles) Act 2016* (NSW)

Failure to report a DUI offence or incident may result in disciplinary action by ACT Cabs Administration.

6. Driver distraction

To provide the service, taxi drivers are required to handle electronic devices that may include a taxi meter, dispatcher, navigation device, mobile phone and payment terminals that may cause them to take their eyes off the road.

As general advice, drivers must:

- Not use a mobile phone while driving or use Bluetooth operated on the steering wheel controls to take phone calls if safe to do so
- Not interact with the dispatcher while driving
- Turn the taximeter on and off when the vehicle is immobile
- Set up navigation before moving off
- Ensure the vehicle is Park before handling a payment device and while passengers are exiting the vehicle
- Ensure all loose objects are properly restrained (e.g. drink bottles, bags, coin holders, phone holders). Under heavy braking, these items may move and hit drivers and passengers.
- Avoid placing unrestrained large objects in the backseat as they may move and injure passengers/drivers in case of an accident.

7. Fare Evasion

Passengers who do not pay for their fares are breaking the law. Fare evasion is covered by the Crimes Act 1958 (under obtaining financial advantage by deception) and a person caught and charged with this could face heavy penalties including prison.

Drivers can request prepayment or that the passenger pays a deposit prior to commencing the fare. Fare evasion must be reported to the police by calling 131444 in the ACT and 02 6298 0599 in Queanbeyan to lodge a report. ACT Cabs will assist police with CCTV footage or booking details.

Drivers are required to act with integrity taking their own safety into consideration and must not:

- Hold passengers in the taxi (e.g. locking doors until payment is received)
- Use force to get money from fare evaders
- Chase fare evaders
- Keep property fare evaders may have left in the taxi

8. Intoxicated / difficult customer

From time to time, drivers may come across difficult customers (e.g. intoxicated persons). Drivers have the right to refuse a fare if they think the passenger may be noncompliant while in their cars. When dealing with intoxicated or difficult customers:

- Don't argue or fight back when confronted with an intoxicated or difficult customer. Stay calm and help to diffuse the situation while being polite.
- If before the fare you think a passenger may be abusive, then don't accept the fare. Give a polite excuse and drive off.
- If during the fare you feel unsafe due to passenger behaviour, you have the right to drive them to a Police Station, or to call the Police.
- Use the duress alarm to alert ACT Cabs call centre
- Don't keep large amounts of cash in the vehicle, or within sight.

9. Dealing with other road users

Driving a public marked vehicle can often draw attention to the slightest mishap. To avoid escalating traffic incidents, drivers must:

- Practise safe driving and observe road rules at all times
- Not drive faster than the speed limit and adjust to driving conditions (e.g. poor weather, unsealed roads)
- Take extra precautions when sharing road with vulnerable road users (e.g. cyclists, pedestrians)
- Use signals when turning or changing lanes
- Not use insulting language or gestures towards other road users

In the event of a road incident, drivers should:

- Not engage in a verbal argument with the other party
- If at fault, give a polite excuse and drive off
- Use the duress alarm to alert ACT Cabs call centre
- Call the police

10. Robbery

Taxi drivers may become targets for robbery due to people thinking they carry large amounts of cash. In the event of an incident, it is important drivers remain calm and cooperate with the demands of the perpetrator. Drivers can avoid robbery by:

- Keeping the taxi locked
- Encouraging electronic payments
- Keeping cash (e.g. loose change) out of eyesight
- Not carrying a large amount of cash (\$50 in change is usually sufficient for a shift)
- Not advertising their takings
- Keeping personal items (e.g. electronic devices) out of sight

11. Road Accidents

In the event of a road accident, drivers should remain calm and follow the following procedures:

- Following an accident, drivers should do a self-assessment, especially if feeling pain around the neck, back and torso areas before exiting the vehicles. If injured, call emergency services on 000 immediately
- Check the well-being of the other occupants in the vehicle
- Where the accident results in a fatality or injury contact emergency services immediately
- Call the police if:
 - Vehicles are blocking the road and cannot be moved
 - There is a threat or suspected breach of the peace
 - Suspected alcohol or drug use contributed to the accident

Details that must be noted:

- Location, date and time of the accident
- Weather, road and light conditions
- Traffic control (e.g. working traffic lights)
- Vehicle information (registration, make, model)
- Name, address, date of birth, contact details, copy of ID of involved drivers
- Contact details of any witness
- Details of police officers in attendance
- Collision information

Drivers should not admit fault as this may have a negative impact on the insurance

12. Weather Conditions

Wet, icy, foggy and windy weather increases the risk of accidents. Drivers need to adjust their driving in bad weather to avoid causing a crash. This includes:

- Reducing speed, especially in wet weather
- Turn on headlights on low beam
- Using the demister function to clear condensation on the windscreen
- Allowing extra distance with the vehicle in front for safer braking
- Avoid driving in water puddles

13. Touting and Soliciting

(<https://www.pointtopoint.nsw.gov.au/learning-centre/fact-sheets/touting-and-soliciting>)

Touting and soliciting is directly approaching a person or people to offer a passenger service.

This includes:

- *approaching potential passengers for fares*
- *calling out to people, asking if they require transport*
- *holding up signs or other printed or digital material offering passenger services*
- *Why can't drivers tout or solicit?*
- *Under the point to point transport law, drivers in NSW must not tout or solicit for passengers.*
- *Touting and soliciting risks the safety of both passengers and drivers.*

Touting and soliciting:

- *is unsafe for both drivers and passengers, there is no record of the passenger service, nor*
- *can anyone be sure safety checks have been made on the driver or vehicle*
- *is a form of harassment and it is unwanted behaviour*
- *in high traffic areas, such as airports, can present unsafe situations for pedestrians and for drivers*

- *illegally undercuts authorised service providers and drivers who are doing the right thing.*

What if I am trying to find a passenger that has pre-booked with a driver?

It is not considered touting or soliciting when a driver asks a person whether they are waiting for the specific booked service provided by the passenger vehicle.

14. Passenger Pick Up and Set Down

I. Bus lanes and transit lanes

Taxis are allowed to use bus and transit lanes in Canberra and Queanbeyan. At specific times, taxis are allowed to use certain bus stops - drivers need to check timings at those bus stations and ensure they are allowed to stop there.

II. Use common sense when picking up and setting down passengers such as:

- Put the vehicle in park to ensure it doesn't move while passengers are moving in/out of the vehicle
- Stop in a safe spot and advise passengers to exit the vehicle on the curb side of the road.
- Remember to stop where it is legal to do so. Look for surrounding signage that may indicate otherwise
- Don't rush passengers to exit the vehicle
- Provide adequate assistance, where safe to do so
- Ensure passengers have moved away from the vehicle before moving off

III. Dropping off a customer with a significant disability that affects the person's mobility in a no-stopping area

- The *Road Transport (Public Passenger Services) Act 2001* (ACT) permits drivers to drop-off a **customer with a significant disability that affects the person's mobility** in a no-stopping area **where it is safe to do so**. This may only occur if the customer has a significant disability that affects the person's mobility and the customer makes this request to aid them with getting to their destination.

15. Transporting a Vulnerable Passenger

It is important for taxi drivers to recognise, understand and properly respond to the needs of vulnerable customers in our community.

An ACT Cabs driver should always provide assistance where it is needed, especially with passengers with special needs such as elderly, frail or disabled persons. Please be patient and respect your passenger's wishes.

It is unlawful for drivers or operators to treat someone less favourably because of an attribute

Drivers must not discriminate or treat any customer in a way that offends, humiliates, insults, incites hatred or ridicules based on a person's attribute or characteristic.

Australia's anti-discrimination laws state that it is unlawful for any person to discriminate on the basis of age, disability, religion, race, sex, intersex status, gender identity and sexual orientation.

Vulnerable passengers also include children, victims of crimes (e.g. domestic violence), people in a state of shock (e.g. after a vehicle accident), intoxicated persons, people with illnesses (e.g. mental illness).

ACT Cabs driver training covers this topic in detail.

16. Covid-19 Plan

Public health orders around covid 19 are constantly changing especially during summer/winter transitions. It is important for drivers and operators to keep updated by following public health advice available on www.covid19.act.gov.au and www.health.nsw.gov.au.

1. Environment

Drivers are encouraged to keep their vehicles well ventilated. This could include keeping a window slightly opened while there are passengers in the vehicle and turning off air-recirculation to bring in fresh air from outside.

2. Distancing

While the recommended 1.5 m distancing cannot be achieved in most vehicles, drivers should ask passengers to sit in the back seat where possible.

3. Masks

The use of masks is strongly advised for drivers and passengers. Where required, taxi operators should keep a mask stock in their vehicles for drivers to use. Drivers should encourage passengers to wear a mask.

4. Covid safe behaviour

If feeling unwell, especially with flu-like symptoms, drivers must complete a Covid RAT. If negative and if fit to be on duty, drivers may start their shift and keep a mask on for the duration of their shift. If positive, drivers must not attend work and follow public health advice available on www.covid19.act.gov.au and www.health.nsw.gov.au.

Although no mandatory isolation is required, covid positive drivers are not fit to drive and should remain home for at least 3 days following positive results.

Drivers must declare their positive covid result to ACT Cabs by email at info@actcabs.com.au.

Unwell passengers

Drivers may ask passengers who seem unwell with flu symptoms to wear a mask. If the passenger/s refuse, the driver may refuse the fare.

Bookings for transporting covid patients (e.g. to/from hospital) can be refused if the driver is uncomfortable providing this service. The driver must resubmit the booking and not cancel it.

5. Hygiene

Drivers must ensure they keep good hygiene while on duty. This includes

- Washing hands regularly for 20-30 seconds
- Use hand sanitiser with at least 60% alcohol
- Use soap and water if your hands are visibly dirty
- avoid touching your eyes, nose, and mouth
- cover your mouth and nose with a tissue or cough into your elbow when you cough and sneeze
- throw used tissues into a bin immediately and wash your hands.

6. Vehicle cleanliness

Drivers and operators must ensure vehicles are disinfected and cleaned:

- After each shift
- After each encounter with an unwell passenger

Drivers may use disinfectant sprays for the interior of the vehicle and disinfectant wipes for touch points such as door handles, steering wheels or gear levers.

It is the responsibility of drivers, operators and passengers to act in a Covid smart fashion ensuring they keep themselves and the people around them safe.

17. Wheelchair Accessible Taxis

<https://www.pointtopoint.nsw.gov.au/about-commissioner/policies/wheelchair-accessible-taxi-licence-compliance-policy>

The additional licence standards which apply to WAT licences are set out below. They seek to ensure the safety of people travelling in wheelchairs throughout the journey and when accepting hirings, to give preference to people in wheelchairs.

Clause 10 of the Regulation states that WAT vehicles must:

- *contain a space at least 1,300 mm long by 800 mm wide by 1,500 mm high for each wheelchair carried by the taxi*
- *have no intrusions into that space, other than adjustable restraint devices*
- *comply with specified safety standards relating to hoists and ramps for people with disabilities, wheelchairs in motor vehicles, and wheelchair tiedown and restraint systems*
- *comply with Disability Standards for Accessible Public Transport*
- *carry wheelchair restraints*
- *be supplied with an approved child restraint*

Clause 26 of the Regulation stipulates that the driver of a WAT must be able to demonstrate competence in safely loading, restraining and unloading a person in a wheelchair.

Clause 65(2) specifies that the driver must ensure that the wheelchair is safely secured to the vehicle throughout the hiring.

To meet the regulation, ACT Cabs asks that WAT operators provide a WAT Compliance certificate as part of the vehicle onboarding process.

WAT drivers must provide a copy of their course completion of the TLIC2040 Provide wheelchair-accessible taxi services to passengers with disabilities. This will ensure drivers are thoroughly trained in the safe use of wheelchair lifts, ramps and securing devices.

WAT operators must ensure drivers who are not trained do not operate wheelchair lifts or provide wheelchair accessible taxi services.

18. Notifiable Occurrences

(<https://www.pointtopoint.nsw.gov.au/safety-and-compliance/notifiable-occurrences#:~:text=an%20incident%20that%20results%20in,physical%20threats%20or%20other%20intimidation>)

Under the Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017 (NSW), ACT Cabs and its affiliated NSW taxi owners, operators and drivers must report occurrences of a serious nature that affect a passenger service.

A notifiable occurrence is:

- 1. an accident or incident that results in an injury treated by an ambulance officer or needs to be treated at a hospital*
- 2. a collision involving a passenger service vehicle that results in damage that prevents the completion of the journey in that vehicle*
- 3. a mechanical fault that prevents the vehicle completing its journey*
- 4. an incident that results in a complaint being made to police regarding sexual assault, indecent exposure, actual assault or physical threats or other intimidation*
- 5. an incident that results in the driver being charged with a major offence under the [Road Transport Act 2013](#).*

18.1 Responsibilities

Taxi drivers and operators are responsible to report any of the occurrences mentioned above to ACT Cabs administration office by either calling 6103 0882 during business hours or by emailing info@actcabs.com.au

When reporting a notifiable occurrence, the information below must be provided:

- Was anyone injured during the incident? Provide details of persons injured
- The location, time and date of the incident
- Date/time incident is being reported
- Name of person reporting incident to ACT Cabs

ACT Cabs is responsible for reporting the notifiable occurrence to the Point to Point Commissioner via the Industry Portal as soon as possible.

19. Animal Strikes

Driving on regional roads is not the same as city driving. Driving safely in regional areas is important. Wildlife and stray stock can move fast and be extremely unpredictable. When animals stray onto the road it's hard to know what they'll do next. Slowing down and being prepared, especially near sunrise and sunset, can save a collision or even save your life.

Safe driving tips:

- Be aware – animals are more active near nature parks and harder to see at sunrise, sunset and at night.
- Reduce your speed – slow down when you see animal warning signs
- Stay alert – animals are unpredictable, so expect the unexpected
- Brake safely – always apply your brakes in a controlled manner
- Never swerve – it is safer to hit an animal than swerve and lose control of your vehicle

20. On-board Fire

A driver should always have an evacuation plan in place. If a driver ever discovers a fire in the taxi follow these steps:

- Remain calm
- Assist all passengers to exit the vehicle calmly and quickly
- The driver must exit the vehicle
- Assemble with any passengers at a safe assembly point
- Alert the Fire Department by dialling 000
- Notify ACT Cabs

21. Failure to maintain current third party liability insurance policy

I. Process to ensure ongoing cover

Drivers must at all times maintain a current third third party property damage liability insurance (TPPD) policy.

ACT Cabs Administration all NSW plated taxis to provide their TPPD upon onboarding.

For NSW plated vehicles, to ensure cover is maintained continuously, ACT Cabs will obtain a current TPPD insurance certificate during each fleet inspection, to ensure ongoing cover and compliance with the requirement.

For ACT plated vehicles, the process of obtaining TPPD certificates is managed by Access Canberra. ACT Cabs has assessed this as a low risk since Access Canberra makes it a condition as part of the vehicle registration process for taxis and collects evidence of the insurance certificate in order to register a taxi.

ACT Cabs has also informed the insurance broker who commonly deals with taxi operators in Canberra to notify ACT Cabs of any lapse in policy, thereby prompting ACT Cabs to suspend the vehicle until evidence of compliance is provided.

II. Process to ensure no gaps between previous year policies

ACT Cabs' process of obtaining TPPD insurance certificates at regular intervals, matching dates, and ensuring current certificates are collected throughout the year and then storing them on ACT Cabs' approved corporate infrastructure ensures there are no gaps between previous year policies.

22. Failure to maintain vehicle registration

There is a risk that a taxi driver may fail to maintain current vehicle registration and thereby let vehicle registration lapse.

To curtail this risk, ACT Cabs Administration runs daily registration checks on the Access Canberra and Service NSW websites to check taxi plate numbers and ensure each vehicle is registered on each working day.

Registration renewal reminders are also set up on SmartMove and automatically sent to drivers each day to help them remember.

If any vehicle is not registered, it is suspended from the system until registration is proven by the vehicle owner.

23. Failure to maintain a roadworthy vehicle

There is a risk that a taxi driver may fail to maintain a vehicle to a roadworthy standard.

To curtail this risk, ACT Cabs Administration carries out the following controls:

- I. Bi-annual fleet inspections of all vehicles affiliated with ACT Cabs;
- II. Immediate actioning of any vehicle reported to ACT Cabs by way of a complaint concerning its roadworthiness;
- III. For NSW plated cars, obtaining a copy of the E-Safety inspection report annually. For NSW plated vehicles, ACT Cabs also runs a daily report on the NSW Government's DVD portal to ensure a 'green light' is showing up next to 'E Safety inspection report' for all NSW plated vehicles;
- IV. ACT plated cars are required to undergo an annual roadworthy inspection via Access Canberra in order to update their vehicle registration.

24. Managing risks of violence

I. Violence against taxi drivers

1. Don't argue or fight back when confronted with an intoxicated or difficult customer. Stay calm and help to diffuse the situation while being polite;
2. If before the fare you think a passenger may be abusive, then don't accept the fare. Give a polite excuse and drive off;
3. If during the fare you feel unsafe due to passenger behaviour, you have the right to drive them to a Police Station, or to call the Police;
4. Use the duress alarm to alert ACT Cabs call centre;
5. Don't keep large amounts of cash in the vehicle, or within sight;
6. Ask passengers to prepay or leave a deposit;
7. Do not hold passengers or their personal items, use force to get money or chase fare evaders;
8. Report incident to police and taxi network;

9. Following an accident, drivers should do a self-assessment, especially if feeling pain around the neck, back and torso areas before exiting the vehicles. If injured, call emergency services on 000 immediately;

10. Check the well-being of the other occupants in the vehicle;

11. Where the accident results in a fatality or injury contact emergency services immediately;

II. Violence against passengers or members of the public

1. Drivers must not argue or fight back when confronted with an intoxicated or difficult customer. Stay calm and help to diffuse the situation while being polite;

2. If before the fare the driver thinks a passenger may be abusive, then they have a right to not accept the fare;

3. All taxis have a security camera for passenger and driver safety;

4. All drivers are police checked and hold a Working With Vulnerable People Registration (WWVP Check).

25. Responding to changing public health orders or emergency orders

In the circumstance of changing public health orders, ACT Cabs Administration will utilise the following methods to communicate the orders with drivers:

- I. Message to be sent to all drivers via their SmartMove MDT (in-vehicle mobile data terminal).

ACT Cabs may also utilise the following communication methods:

- I. SMS communications
- II. Email communications

The Managing Director of ACT Cabs or a delegated authorised manager can make 'emergency orders' or 'public health orders' to protect stakeholders' health if a pandemic or other national or state emergency declaration has been made by Federal, State or Territory authorities.

These orders can be made to put in place similar health measures that have been introduced by the public health directions.

An emergency or public health order can include restrictions that are necessary to protect ACT Cabs stakeholders during a public health order or other type of health order. Some examples may be:

- Wearing a face mask to stop transmission of a virus;
- Wearing certain forms of protective clothing;
- Disinfection requirements of taxis;
- Disinfection inspections or orders;
- Limiting the amount of drivers or vehicles who can drive.

26. Risk of impact on customers due to interruptions in service

I. Degree to which participants rely on the provider's services to meet their daily living needs;

ACT Cabs passengers utilise ACT Cabs' services for a wide range of reasons including and not limited to: social events, work events, medical appointments, general transportation needs, etc.

Vulnerable passengers or those who are NDIS participants may need to utilise ACT Cabs' services for the purpose of arriving at medical appointments or other health related appointments. Travel services provided by ACT Cabs may be an important factor in meeting the daily living needs of a customer.

II. Extent to which their health and safety would be affected if those services were disrupted.

If services were to be disrupted, passengers may miss health related appointments or those that may impact their wellbeing. ACT Cabs implements and maintains a number of processes and controls via its dispatch system, driver compliance check systems, call centre and office systems to minimise the occurrence of service interruptions.