



## **Response to the Senate Inquiry (Select Committee on Job Security)**

**March 2021**

### **Introduction**

Deliveroo welcomes the opportunity to make a submission to the Select Senate Committee on Job Security.

Deliveroo was founded in 2013 in London and today works with tens of thousands of restaurants and riders to provide the best food delivery experience in the world.

Deliveroo launched in Australia in November 2015 and is proud to offer flexible well-paid work to more than 8,000 self-employed food delivery workers - or riders - across Australia. We currently receive around 700 applications a week from people who want to be riders. Deliveroo partners with more than 13,000 of Australia's best-loved restaurants across 15 cities - Sydney, Wollongong and Newcastle in NSW; Melbourne, Geelong, Ballarat and Bendigo in Victoria; Brisbane, Gold Coast, the Sunshine Coast and Cairns in Queensland; and Perth, Adelaide, Canberra and Hobart - to bring great tasting food straight to people's front doors. Our partners range from small, independently owned restaurants and cafes, to catering businesses, franchises and larger chains.

Deliveroo respectfully disagrees that the opportunities Deliveroo provides to riders are insecure or precarious. Deliveroo provides self-employed people with opportunities to complete the delivery of orders of food at times suited to them, their other work or responsibilities, and lifestyle priorities. That is, it is flexible work as opposed to being insecure or precarious.

The flexible nature of the work we provide for riders has been a lifeline to many during the COVID-19 crisis. In addition, online delivery platforms, like Deliveroo, boosted and sustained the Australian restaurant sector during this period. The pandemic lockdowns of 2020 proved how vital the on-demand sector is as a source of work for both riders and those working in restaurants, driving revenue in the restaurant sector and as a result making a significant contribution to Australia's economic recovery. Deliveroo commissioned Capital Economics to conduct research to understand the contribution made by Deliveroo and food delivery platforms during the national lockdown period from April to June 2020. The findings revealed that delivery services supported turnover of \$1bn for Deliveroo partner restaurants between April and June 2020 and protected 38,000 jobs, demonstrating the important role played by food delivery platforms.

Deliveroo's model of engagement with self-employed riders is inconsistent with employment, whether full-time, part-time or casual. None of these employment relationships provide the flexibility inherent to the way in which self-employed riders work with Deliveroo. We believe that everyone, regardless of the basis of their engagement and the work they choose to do, should be provided with security and benefits, but the law presently fails to accommodate this. Deliveroo would like to give additional benefits to riders but we want to do this in a way that is compatible with flexibility and, therefore, ensures they do not lose the independent, self-employed status which riders value so highly.

Deliveroo would be happy to provide further detail on anything in this submission if the Inquiry would find it helpful. We would also be willing to convene a roundtable for members of the Inquiry to meet with Deliveroo riders to understand their views and motivations in more detail, if that would be useful.

We have addressed relevant Terms of Reference as they pertain to Deliveroo's business model and our views on the gig economy sector.

### **1) The extent and nature of insecure or precarious employment in Australia**



Deliveroo respectfully disagrees that the opportunities Deliveroo provides to riders are insecure or precarious. Deliveroo provides self-employed people with opportunities to complete the delivery of orders of food at times suited to them, their other work or responsibilities, and lifestyles. That is, it is flexible work as opposed to being insecure or precarious.

#### Key Features of the Deliveroo self-employed model

Deliveroo engages the services of independent contractors to perform delivery services. Riders in Australia choose the self-employed model because this offers the flexible work they seek.

The key features of working as a self-employed Deliveroo rider are:

- (i) There is no obligation to work at a certain time or for a set number of hours, or even at all. Where riders do choose to work, there is no obligation to do so personally. Riders have an unfettered right to appoint delegates at their discretion.
- (ii) Riders work with multiple companies, often working across multiple platforms and with other clients at the same time as being logged in to the Deliveroo platform (multi-apping).
- (iii) Riders have no fixed work arrangements, they pick their own times to go online and be available for delivery, for as little or as long as they like.
- (iv) Once online, riders are free to accept or reject any orders offered to them. Having accepted an order, a rider can “unassign” from it at any time.
- (v) Riders choose where they work, what vehicle they use, the routes they take to complete deliveries and what clothes and safety equipment they wear.

Riders frequently reject orders - for example, because they are currently completing an order for another platform or restaurant and the offer isn't convenient for them - and they can do so without sanction. In the past 6 month period (1 September 2020 to 28 February 2021 inclusive), riders across Australia rejected 37.4% of all delivery orders at least once.

The relationship between an employee and an employer, whether full-time, part-time or casual, is fundamentally different to the relationship between a self-employed platform worker and a platform. In the on-demand economy, people can choose whether or not to work, where to work, when to work, can reject work at any point, who will perform the services, and can work for multiple companies simultaneously. Having complete flexibility allows riders to fit making deliveries around study, hobbies, caring responsibilities or other jobs. Even where riders choose to work, there is no obligation to do so personally, with riders able to appoint delegates at their discretion.

This is a fundamentally different relationship to that found in more traditional forms of work, and there is no comparable sector that offers this degree of freedom and control for individuals. Equally, there are no applicable industrial awards that permit flexibility of this nature.

Deliveroo chooses to operate this model because it provides riders with the flexible work opportunities they tell us they want, and this is reflected in riders' overall satisfaction with Deliveroo. In fact, the latest Deliveroo Rider Satisfaction Survey<sup>1</sup> of more than 850 riders revealed nine in ten said it was important having the flexibility to choose when and where they work with Deliveroo.

And in a recent survey<sup>2</sup> of more than 1,900 riders, which looked at the Rider Satisfaction Score, 84% said they were satisfied riding with Deliveroo. We are proud of these results and stay in regular contact with riders to understand and respond to their concerns and priorities.

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<sup>1</sup> The Deliveroo Rider Satisfaction survey was completed by 867 riders in the last 30 days to 26 March.

<sup>2</sup> The Rider Satisfaction Score is the average figure when asking riders to rate their experience riding with Deliveroo from 1 to 5. 1,921 riders completed this question between 8 March and 21 March.



We are confident that there is no form of traditional employment available in Australia that allows riders to work whenever or wherever they want; allows them to plan where to work; allows them to work for a competitor at the same time; and allows them to freely delegate work in this way.

## **2) The risks of insecure or precarious work exposed or exacerbated by the COVID-19 crisis**

The flexible nature of work we provide was a lifeline to many during the COVID-19 crisis. During the 3rd week of March 2020, Deliveroo saw applications from people seeking to ride for Deliveroo escalate to 1,700 per week. That has now returned to pre-pandemic levels of approximately 700 applications per week.

New riders are on-boarded across Australia as needed - when we expect customer demand to increase or if the number of riders we currently have isn't enough to meet customer demand. This gives us and riders confidence that when riders decide to log on to the Deliveroo App, there will be sufficient orders available for delivery.

To support riders during the pandemic we introduced a number of initiatives such as:

- Contactless delivery
- Hand sanitiser stations in restaurant hotspots
- Rider Support Fund for riders who were required to self-isolate for 14 days or were diagnosed with COVID-19
- Distributed hand sanitiser and masks to all riders at the beginning of the pandemic
- Introduced a rebate scheme so riders could claim the purchase of masks and hand sanitiser
- Hygiene guidance
- Extending the number of short courses available on the Rider Academy site

The significant value of the principle of flexibility in the workplace was highlighted during the COVID-19 crisis. The Prime Minister himself drove a policy of industrial relations flexibility to help employers keep people in jobs and share hours. In making his argument to extend emergency measures made to the Fair Work Act beyond September 2020, Scott Morrison warned that, "industrial relations inflexibility in this environment will cost jobs."<sup>3</sup>

At the beginning of the pandemic Deliveroo joined other industry participants, including the Restaurant and Catering Association, to advocate strongly for restaurants and cafes to be allowed to stay open for delivery and takeaway. This not only enabled riders to continue working, and for people who had lost their jobs to find a source of income, but enabled restaurants to keep operating and retain staff.

In the first month of the pandemic, around 3,200 restaurants joined the Deliveroo platform between April and 30 September 2020. According to the August 2020 HospoVitality Index Report, 46% of restaurants turned to delivery for the very first time, and 51% agreed food delivery would be important as they move out of COVID-19. When we contacted restaurant owners for the January 2021 HospoVitality Index Report, 59% said delivery would play an even bigger role than before.

Deliveroo also commissioned Capital Economics to conduct research to understand the contribution made by Deliveroo and food delivery platforms during the national lockdown period from April to June 2020. The findings demonstrated the positive impact food delivery platforms had on the economy and in keeping restaurant doors open and people employed.

The research found that:

- Delivery services like Deliveroo supported 38,000 jobs in Deliveroo's Australian partner restaurants during the prime national lockdown period between April and June 2020;

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<sup>3</sup><https://www.theaustralian.com.au/nation/politics/scott-morrison-eyes-longterm-ir-changes-to-give-employers-employees-flexibility/news-story/f3fd90fb9d21b98a755e056861eb84e6>



- Delivery services supported turnover of \$1bn for Deliveroo partner restaurants between April and June 2020;
- Deliveroo partner restaurants used JobKeeper at a lower rate than the broader hospitality sector as a result of delivery supporting jobs in restaurants. Without it, the cost to the Federal Government would have been higher; and
- Deliveroo's operations support more than 12,000 jobs in the Australian economy.

Last year (2020) demonstrated how vital the on-demand sector is as a source of work (for both riders and those working in restaurants), driving revenue in the restaurant sector and as a result making a significant contribution to Australia's economic recovery.

### **3) Workplace and consumer trends and the associated impact on employment arrangements in sectors of the economy including the "gig" economy and "on-demand" economy**

The pandemic has changed consumer behaviours, with online purchasing becoming a cemented practice for the broader population. As a subset of that, we have seen more people order meals from restaurants through the Deliveroo platform.

Deliveroo observed an uplift in order volumes and frequency, as people sought to offset the routine of cooking at home. The busiest times of the week are still Friday and Saturday nights, however Sunday lunchtimes also increased in popularity. The biggest growth area was during breakfast and lunch, driven by consumers isolating or working from home. With the return to working in the office and dining out, order frequency has reduced a little, but not back to pre-COVID levels. In other words, people's behaviours have changed and they're more used to ordering online and are continuing to do so.

With the increase in consumer demand for food delivery services came an increase in demand for food delivery workers. Riders opted to increase the average hours per week that they chose to work with Deliveroo. Those hours have returned to an average of 18 hours per week from a high of 30 hours per week in April and May last year.

Further, we know that the average tenure for a rider is generally 40 - 41 weeks. That is, they are taking up food delivery work to fill a gap, to fit in around study or pick up extra cash.

During the pandemic a number of smaller platform businesses were established and competition grew. This is good for all sides of the marketplace as it drives up standards across the board. Deliveroo competes to offer riders the best experience and package, to offer restaurants the best opportunities and to give customers the best service experience and restaurant variety. These entities continue to trade post-pandemic and therefore provide ongoing competition.

### **4) The effectiveness, application and enforcement of existing laws, regulations, the industrial relations system and other relevant policies**

Deliveroo believes that those who opt to work in the on-demand economy should be entitled to both maximum flexibility as well as greater security. However, this must be facilitated in a way that is compatible with the flexibility that comes with self-employment. This is what Deliveroo riders want, and our view is that any policy change related to how riders work should be rooted in seeking to deliver their objectives and best interests.

#### Differences between on demand and casual work

The legal concepts of "employee" and "independent contractor" evolved at a time before technology transformed the economy and allowed a platform, such as Deliveroo, to exist and give people the opportunity to choose new ways of working. We argue that this traditional dichotomy can not be



resolved so that Deliveroo can provide both the flexibility that riders want and the security we believe riders deserve.

Traditionally, Australian employment law has sought to provide certain flexibility to employers and employees by allowing workers to be engaged on a “casual” basis. A casual employee generally works irregular hours (with no guarantee of further work or an obligation to accept work), does not receive paid personal/carer’s leave or annual leave and can be dismissed without notice (or payment in lieu) or any redundancy benefits. A casual employee receives a higher hourly pay rate than the equivalent full time-time or part-time employees (the casual loading) to compensate them for lack of paid leave entitlements.

While casual employment is more flexible than part-time or full-time employment, it is still subject to regulation that would be incompatible with the degree of flexibility that characterises the on-demand economy. For example, casual employees are paid by the hour. This would necessitate the need to schedule riders for those hours (and for the minimum number of hours required under the applicable modern award as noted below) and also limit the supply of riders during those hours.

With the Fee per Delivery model we operate and the ability of riders to log in or out whenever and wherever they want, riders can come and go as they please, doing the deliveries that they want to do and being paid for them, rather than having to do deliveries they are compelled to do. This Fee per Delivery model and ability to log in and out freely, enables the flexibility that riders value so highly. In addition, the ability to multi-app (where riders work with multiple companies, often working across multiple platforms and with other clients at the same time as being logged in to the Deliveroo platform) is something riders value so they can maximise their earnings by selecting the deliveries they want to make.

Many modern awards also require that casual employees be provided with a minimum number of working hours (ranging from 2 to 4 hrs) each time they are engaged. These minimum shift length requirements for casual employees conflict with the key features of working as a self-employed Deliveroo rider.

Working with the Deliveroo platform, riders can log in or out whenever and wherever they want, as they have no obligation to work at all, or for any minimum time. Our internal data shows that 82% of all riders log in for less than 3 hours at a time. Mandating a set number of hours of work, and restricting their ability to work across multiple platforms at the same time, would be very unpopular with riders, the vast majority of whom tell us they value flexible self-employed work very highly. In addition, a system whereby Deliveroo had to impose shifts on riders would represent a significant shift of power away from the worker to the company. This is not something we want to do. It would clearly be unpopular with riders and directly contradicts the reason many choose to engage with Deliveroo in the first place.

It is also worth noting that ‘multi-apping’ is a prevalent practice. This is where a rider will be logged in to the apps of several platforms at the same time and will perform deliveries for whichever platform is most convenient for them at any given moment, often making deliveries for multiple separate companies within any given hour. However, if a rider was engaged as a casual employee, they would be restricted from working with competitor platforms at all, and certainly could not do so within the same ‘shift’ as they were receiving an hourly wage from one employer.

#### Providing benefits to riders

As the Inquiry will be aware, consideration of whether or not a worker is provided with benefits ordinarily associated with employment is a factor that will be taken into account when determining the nature of a relationship<sup>4</sup>. As will be evident from the case law, it would be difficult for Deliveroo to

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<sup>4</sup> In *Stevens v Brodribb Sawmilling Company Proprietary Limited* [1986] HCA 1; (1986) 160 CLR 16 Mason J (at 29) stated that: “it is the **totality of the relationship** between the parties which must be considered”.



reconcile a position that riders are independent contractors if in addition to the benefits associated with that status (such as flexibility), we were also to provide employment benefits such as superannuation or paid leave under the current legislative framework. If we did, this would likely work against our position in the event that a court or tribunal is asked to assess the "totality of the relationship" when making a determination on claim for employment status. There is, therefore, a considerable disincentive for platforms who want to protect flexibility for riders and their operating model to provide any such benefits.

The current framework for the provision of employment benefits such as paid as personal / carer's leave or annual leave is also incompatible with on-demand work. This is because paid leave is calculated on the basis of an employee's "ordinary hours of work".

A simple expansion of this entitlement would not work in circumstances where:

- (i) What constitutes "ordinary hours of work" is unclear when riders are not under any obligation to do any minimum amount of work, and when they do choose to make themselves available to perform services by logging on to the app, they can reject orders offered to them because, for example, they are working with another platform at the same time as being logged onto the Deliveroo app. Therefore, it is evident that time logged on to the app, which is clearly not at the direction and control of Deliveroo, cannot be equated with "ordinary hours of work".
- (ii) It is equally not clear what would constitute a "continuous period" of employment in the on-demand economy where work patterns are highly variable. We do not know whether this would begin from the moment a rider on-boarded, or whether this would be subject to having performed a certain quantity of work across a specific period of time. Nor would it be clear how riders who choose to take long periods of time away from working with Deliveroo should be treated. Freedom and flexibility of this nature would not work even for casual employees paid on an hourly basis. For example, 40% of riders who have been working with Deliveroo for at least six months have taken one month or more of consecutive time away from Deliveroo.
- (iii) Riders are often simultaneously working for other companies while logged in (multi-apping), which means it is unclear which company would be liable for payments and the accrual of benefits during this period.
- (iv) Additionally, the right of delegation that all riders have means it may not even be the rider with whom Deliveroo has a supplier agreement who is working at any given time.

Should riders be reclassified as "employees, it is likely that Deliveroo would work with fewer riders on the road who, unlike now, would operate in fixed shifts. This would be bad for the students, carers and others who supplement their income with delivery work, as it would mean employing a different cohort of riders; it would be bad for customers, who would be denied choice and speed as a result of fewer drivers being on the road; and bad for restaurants, who would see lower revenue growth from deliveries through the Deliveroo platform.

### Need for legislative reform

Deliveroo recognises that ending the trade-off between flexibility and security will require legislative change. It is important to note that the power to amend the statute book in this area rests with the Federal Government and not at state level. Indeed, we believe any policy proposals around work status must be driven by the Federal Government to ensure national consistency and clarity. A patchwork of incompatible Commonwealth, State and Territory laws and regulations risks creating confusion for riders and unfairness in the system. Where law reform is considered, it should enable

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In *Odco Pty Ltd v Building Workers Industrial Union of Australia* [1989] FCA 483, when examining the relationship, Woodward J found that the workers were independent contractors, reasoning (at 121-2) that: "*it is clear that the arrangements which Troubleshooters makes with its workers are very different form (sic) those made by other labour hire agencies. It makes it clear that it does not intend its workers to be its employees. They are not paid a weekly wage nor do they receive any of the normal benefits of a wages employee, particularly annual leave and sick leave*". (Emphasis added)





workers to accrue benefits on the basis of work performed. For example, the number of deliveries completed or the value of fees earned, rather than their ordinary hours of work (which, as noted above, is not easily calculable given the nature of the work). Further, the provision of benefits by a company to a self-employed contractor should not impact on the genuinely agreed terms of their engagement.

The Australian industrial relations and employment regulation landscape is complex and Deliveroo believes that all riders in Australia deserve to benefit from any law reform that enables companies like ours to offer new benefits to riders. As stated above, a patchwork of incompatible state regulations risks creating confusion for riders. It is our view that it would be unfair if something as important as the degree of a security that an individual has when they work were to be subject to widely varying rules that may not be known to them when they cross State or Territory borders. We have consistently argued that the Federal Government should be the driving force in solving this policy and legal challenge. Where there is no federal coverage, such as work health and safety regulation, this could potentially be done through the National Cabinet passing "model" legislation that could be implemented uniformly at State and Territory level.

The creation of state by state based regulation would create additional burdens and costs to organisations having to implement - and then monitor - new rules. Such additional burdens on businesses which, in the case of food delivery platforms, operate on low margins could have a negative impact on their growth and investment, with resultant negative impacts on customers, riders and restaurants.

Just as the Fair Work Act has been so important in providing a foundation of standards for the traditional workplace, an equivalent is now needed to build on this for modern ways of working. Deliveroo has argued previously for a Commonwealth 'Future Work Act'. This could, for example, outline the relationship between platforms and contractors that ends the trade-off that currently exists in legislation between flexibility and security, giving those in the on-demand economy what they want, which is both. A 'Future Work Act' could set out the responsibilities companies have to contractors - the freedoms and flexibility that contractors can rely on as well as the security they can expect.

- **Freedom and Flexibility:** The 'Future Work Act' could define the flexibility that on-demand workers must be guaranteed, for example the right to set their own working patterns, and clarity that there is no obligation to perform work or accept set hours, and no restrictions on working with multiple providers or using a delegate to provide the services.
- **Security:** The 'Future Work Act' could outline that a company is able to directly provide certain benefits to contractors, including, for example, accident and injury or third party liability insurance; income protection when temporarily unable to work because of an accident; paid personal/carer's leave; is able to provide training, such as specialist training courses related to the work contracted for, or training for wider life skills or educational qualifications that are unrelated to the work the contractor performs.

The answer to the policy challenge of people seeking new ways of working cannot be to deny them the very flexibility that has attracted them to opt for new types of work in the first place, or to entrench a system that disincentivises companies from offering independent contractors greater security in the form of benefits, as the current system does. This would be the consequence of simply reclassifying on-demand workers as 'employees', and it would fail to serve the interests or the wishes of the on-demand workforce, and the businesses and consumers that rely on the services they provide.

It is important to note that the 'Future Work Act' is not simply putting in place portable benefits or clarifying the gig platform and independent contractor relationship under the existing industrial relations framework; it would be an entirely new industrial relations framework bespoke for the growing gig and on-demand economy.

## 5) Accident compensation schemes, payroll, federal and state and territory taxes



### Accident compensation

Deliveroo provides income protection and personal injury insurance for all riders, and their delegates; and public liability insurance for cyclists (as they are not covered by compulsory third party insurance). The policy starts as soon as they log on, up until 1 hour after their last delivery, no matter who they are delivering for at the time. Delegates are also covered. The policy includes death and permanent disability compensation, payable to the family.

In 2019 we investigated whether state based Work Cover schemes were the best form of insurance for the type of work that food delivery riders do, and we came to the conclusion they weren't for a number of reasons:

- Food delivery riders are not employees, and there were a number of instances where work cover claims were rejected by Work Cover, which was of great concern to us.
- Many riders also delegate their account to others who use it to conduct deliveries; the delegates are not covered by Work Cover.
- Work cover only covers the time a rider is delivering an order, whereas our insurance covers all time logged in, including up to an hour after their last delivery

The policy we selected is broadly equivalent, and in some instances better than, the state based WorkCover schemes.

### Tax

Deliveroo has acted at all times and continues to act in accordance with its legal obligations regarding State and Federal taxation.

### **6) Any related matters.**

#### Rider Safety

Rider safety is an issue that has gained much media and government attention due to the terrible fatalities that occurred in 2020. While they weren't Deliveroo riders, we believe it is incumbent upon all food delivery platforms to ensure we are doing all that we can to help ensure riders are safe while undertaking deliveries.

Deliveroo puts riders at the centre of all that we do, and their safety is of paramount importance to us; we have a strong commitment towards their well being. Deliveroo is diligent in our compliance with our obligations under the Work Health and Safety Act (WHS Act)

Importantly, we provide a range of measures to ensure riders are supported while working (see further detail below). This includes personal injury and income protection insurance free of charge, and riders participate in a comprehensive onboarding program that includes online learning modules on road safety. We are constantly looking at ways we can improve and seek feedback directly from riders on what they would like us to do.

Looking ahead to Q2 there are a number of activities we are putting in place including:

- Rider Safety Advisory Panel - This is a national initiative launched in 2019. Riders are elected by their peers to sit on the Panel. In Q2, we plan to work with the Panel to launch a number of rider-led ideas, such as hi-vis vehicle stickers, vehicle maintenance information and first aid courses.
- Winter campaign - We will roll out a holistic, month-long safety campaign to make riders feel confident and safe while riding during winter months. Topics will include visibility, maintenance, road rules and peer led rider tips.
- Rider kit review - we will be reviewing current rider kit to ensure it best meets needs of riders with safety in mind.





The contract we have with riders explicitly states they are free to conduct their deliveries using any route they decide is safe and efficient. We do not set target delivery times for riders, and we do not, and never will, encourage riders to be unsafe on the roads. The dispatch algorithm provides the best route for the vehicle type nominated by the rider, and updates in real time depending on traffic and weather conditions. Further, a buffer of additional time is built into the estimated range.

There is no doubt that the issues of road safety are complex and require the input of experts, industry and Government to build solutions. We are committed to working with stakeholders to achieve this. Any consideration of initiatives must be thoughtful, balanced and well planned and extend beyond the role of the food delivery platforms to areas such as traffic management, road infrastructure and community awareness.

Further detail is below:

- Onboarding:

As part of the onboarding process all riders must complete health and safety online learning modules according to their nominated vehicle type. The modules include safety videos for motorised vehicles and bicycles and road safety information relevant to their location. Other modules include conducting vehicle checks, and the legal and recommended standards for PPE. We believe we offer the most comprehensive onboarding process.

We regularly review our processes and online learning modules to ensure we have the most up to date best practices in place. Further, we regularly communicate road safety information to riders using a range of channels, including the online [Rider Safety Information Hub](#), which contains important information from all the road jurisdictions across the country.

- Kit:

Riders get a free core kit when they onboard with us. What this contains varies depending on the vehicle type they nominate, however all riders receive a free reflective jacket. We also replace damaged or worn out items for free to active riders.

In response to rider feedback we will also be issuing free high vis vests to all riders who use scooters, motorcycles or bicycles to conduct deliveries. This program will be completed by the end of Q2 2021.

- Vehicles:

As independent contractors, food delivery workers provide their own tools of trade, including a mobile phone and mode of transport. Their supplier agreement with Deliveroo stipulates that their vehicle must meet the roadworthy requirements of the state where they work.

- Insurance:

Deliveroo provides every rider with free personal injury and income protection insurance, which activates as soon as a rider logs onto the app, and up to an hour after their last delivery. This covers riders even if they are not actually performing delivery services for Deliveroo at the time.

Compensation for dependents or family in the event of a death or permanent disability is included in the insurance policy. We also provide free public liability insurance.

- Rider Safety Advisory Panel:

We established the first Australian Rider Safety Advisory Panel in 2019, which comprises a group of ten riders from across the country who meet regularly with Deliveroo and advise on safety issues. A number of initiatives have been implemented as a result, including the online Rider Safety Information Hub, and free Safety Sticker messaging, which riders can put on their kit to remind the public and other delivery riders of key road rules and safe road practices.

We have kicked off the process for the 2021 Rider Safety Advisory Panel and the first meeting is scheduled for April 2021. We will again be taking the ideas presented by the Panel and assist with implementing them.

- Regular communication with riders:



We regularly engage with our riders on the things that matter to them, and are always open to feedback in all areas of their engagement with us.

We frequently survey riders on a range of topics, including safety and have implemented a number of actions in response.

## **Conclusion**

The COVID-19 pandemic has reshaped the world, from plunging economies into recession, to forcing companies to rapidly innovate to survive. It's transforming the way our public and shared spaces, as well as homes, are used and has proved an uncertain and unpredictable time for politicians and populations around the globe. Here in Australia we are observing swift economic recovery alongside a distinct change in the way people live and work with the fast adoption of technologies and habits such as purchasing online.

The online food delivery sector proved to be a significant lifeline to many in 2020. Companies like Deliveroo helped to boost and sustain the Australian restaurant sector during the pandemic and in turn have helped to protect jobs, provide work and drive economic activity for many. As evidenced by data from the HospoVitality Index Report, the online food delivery sector will continue to play a vital role. Therefore, it is essential any proposed regulation supports this sector rather than having a detrimental effect on it.

Deliveroo wants to work with all stakeholders to ensure that any regulation of this sector combines the flexibility of on-demand work which people want, with the security they deserve. Companies should not have to be forced, as they effectively are now, to choose between offering workers a relationship with a great deal of flexibility and fewer benefits or a relationship with much less flexibility and more benefits. Companies should be able to offer the best of both worlds. Were the law more accommodating, we would seek to give our riders greater security without sacrificing their flexible arrangements.

We hope this submission is helpful to policy makers when it comes to the motivations people have for choosing to work in this way and for working out a way forward to create a framework that is fit for the future of Australia, supporting the growing on-demand economy and those who work in it. As set out at the start of this submission, we would be delighted to invite any members of the Inquiry team to meet Deliveroo riders at a focus group, where they could discuss why riders choose flexible, on-demand work.

**[ ENDS ]**