



**MANLY INDEPENDENT CABS  
SAFETY MANAGEMENT SYSTEM**

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## 2 Overview

This document has been developed to outline our approach to managing work related health & safety risks that may occur while driving a taxi. National laws impose safety duty obligations on Drivers, Vehicle Owners, Booking Service Providers (BSP's) and Taxi Service Providers (TSP's) to ensure the safe operation of taxis.

## 3 Roles and Responsibilities

BSP's and TSP's have a responsibility for:

- Preparing, updating and implementing the Safety Management System, including associated procedures;
  - Ensuring that all work is conducted in a manner without risk to associated drivers and Manly Independent Cabs staff members.
  - Identifying risks that may occur while
  - Investigation of hazard reports and ensuring that corrective actions are undertaken
- Associated Service Providers:
- Comply with Manly Independent Cabs Safety Management System.
  - Complete the vehicle checklist prior to commencement of shift.
  - Ensure all work conducted is in a manner without risk to yourself or passengers.

## 4 Record Keeping and Incident Management

Records shall be kept that document how the required safety standards are being met when implementing the Safety Management System.

This Safety Management System shall be regularly reviewed in consultation with others who have a safety duty that relates to the service, such as drivers, affiliated providers and vehicle owners. Records must be kept of these consultations.

If a serious incident ([Notifiable Occurrence](#)) occurs, it must be reported to the Point to Point Transport Commissioner.

A record of the registration number of all taxis in the fleet in a form approved by the Commissioner and uploaded in the Driver Vehicle Dashboard (DVD) for all taxis used to provide services in the Sydney Metropolitan Transport District.

## 5 On-boarding

All drivers will be instructed in the Manly Independent Safety and Fatigue Management Systems and will be required to sign off to indicate agreement..

## 6 Review and evaluation

The Safety Management System shall be documented and regularly reviewed in consultation with others who have a safety duty that relates to the service, such as drivers, affiliated providers and vehicle owners. Records must be kept of these consultations.

## 7 Manly Independent Cabs Risk Register

This Risk Register is to be used to record all hazards or safety issues identified by staff and management.

# MANLY INDEPENDENT CABS - SAFETY MANAGEMENT SYSTEM V1.0 (May 2012)

## Risk Register

Hazard/Risk	Likelihood	Severity/Impact Consequence	Risk Rating	Recommended controls	Responsible
Violence	Moderately likely	Major Consequence could result in death or permanent injury (driver, passenger, bystanders)	High	<ol style="list-style-type: none"> <li>1. Take booking details of customer including contact details</li> <li>2. Ensure customer sits in rear of the vehicle as applicable</li> <li>3. Do not collect passengers late at night from drinking venues</li> <li>4. Ensure someone is aware of your location at all times</li> <li>5. Ensure mobile phone is charged to contact emergency services as applicable</li> <li>6. Do not pick up unruly/abusive passengers</li> <li>7. Ensure you are calm and in control whilst providing passenger services</li> </ol>	BSP Driver
Psychological Risks (e.g. effects of witnessing fatal accident)	Moderately Likely	Major Consequence – may affect mental health and ability to provide passenger services	High		

The Risk Rating is determined by using the Risk Matrix

### Sample Risk Register for Single Operators

Risks may become more significant during peak periods or events.

Template - Risk Register single driver / operator

Hazard / Risk	Likelihood	Severity / Impact / Consequence	Risk Rating	Recommended Controls	Responsible
Violence	Moderately Likely	Major Consequence – could result in death or permanent injury (driver, passenger, bystanders)	High	<ol style="list-style-type: none"> <li>1. Take all booking details of customers including contact details.</li> <li>2. Ensure customers sit in the rear of the vehicle as applicable.</li> <li>3. Do not collect passengers late at night from drinking venues.</li> <li>4. Ensure someone is aware of your location at all times.</li> <li>5. Ensure mobile phone is charged to contact emergency services as applicable.</li> <li>6. Do not pick up unruly / abusive passengers.</li> <li>7. Ensure you are calm and in control whilst providing passenger services.</li> </ol>	BSP BSP BSP BSP BSP BSP
Psychological Risks (eg effect of witnessing a fatal car accident)	Moderately Likely	Major Consequence – may affect mental health and ability to provide passenger services	High	<ol style="list-style-type: none"> <li>1. Contact counselling services.</li> <li>2. Take time to ensure mental well-being before driving again.</li> </ol>	Counsellor BSP
Driver Distraction	Moderately Likely	Major Consequence – could result in death or permanent injury (driver, passenger, bystanders)	High	<ol style="list-style-type: none"> <li>1. Ensure all devices (where possible) are off / away whilst conducting a passenger service.</li> <li>2. As applicable ensure passengers are seated where they are unlikely to be a distraction.</li> </ol>	BSP BSP
Subliming and Towing	Unlikely	Major Consequence - Loss ability to conduct passenger services under the Point to Point legislation	Medium	<ol style="list-style-type: none"> <li>1. Do not solicit or tout, this is illegal.</li> </ol>	BSP
Passenger Pick up and Set Down	Moderately Likely	Major Consequence – could cause death or permanent injury (passenger)	High	<ol style="list-style-type: none"> <li>1. Only collect passengers from a location where it is safe for them to enter the vehicle.</li> <li>2. Never pick up or set down a passenger in the middle of the road.</li> <li>3. Be aware of hazards on the side of the road and avoid them when picking up or setting down a passenger.</li> <li>4. Be aware of environmental factors whilst picking up and setting down a passenger (such as slippery surfaces when it is raining).</li> </ol>	BSP BSP BSP BSP
Transporting Vulnerable Passengers (VPs)	Moderately Likely	Major Consequence – could result in death or permanent injury (VP)	High	<ol style="list-style-type: none"> <li>1. When possible have an awareness of the needs of VPs.</li> <li>2. Ensure additional care is taken collecting and dropping off a VP.</li> <li>3. Assist the VP (without compromising your own safety).</li> <li>4. Ask VP whether they require additional assistance.</li> </ol>	BSP BSP BSP BSP
Fatigue	Highly Likely	Major Consequence – could result in death or permanent injury (driver, passenger, bystanders)	High	<ol style="list-style-type: none"> <li>1. Ensure that a reasonable amount of driving each day is not exceeded.</li> <li>2. Take regular breaks throughout the day.</li> <li>3. Ensure that you do not work too many days in a row without having a 24 hour period off.</li> </ol>	BSP BSP BSP
Drug & Alcohol Policy	Unlikely	Major Consequence – could result in death or permanent injury (driver, passenger, bystanders)	Medium	<ol style="list-style-type: none"> <li>1. Do not drive whilst under the influence of drugs or alcohol.</li> <li>2. Ensure any new medications are checked for side effects before driving.</li> <li>3. Do not drive whilst under the effect of medications which cause drowsiness.</li> <li>4. Ensure adequate time has passed before driving after drinking alcohol.</li> </ol>	BSP BSP BSP BSP

## 8 Risk Matrix

<b>Risk Assessment Matrix</b>				
Impact of Risk (Severity / Consequence)	Major	Medium	High	High
	Moderate	Medium	Medium	High
	Minor	Low	Medium	Medium
Seriousness of Risk= Likelihood x Impact		Unlikely	Moderately	High Likely
		Likelihood		

## 9 Managing the Risk identified in the Risk Register

### 9.1 Drug and Alcohol Consumption

Drivers are required to have a zero-blood alcohol and drug reading, you should expect to be tested. Drivers are not permitted to carry any alcohol in the taxi unless it is the property of the passenger. It is illegal for passengers to drink alcohol in the cabin of the taxi. Taxis are considered a “public place” and drinking alcohol in a public place is prohibited by law. Wherever possible, alcohol should be carried in the boot rather than the cabin of the vehicle. Driving while under the effect of drugs will have consequences similar to driving under the influence of alcohol. Drivers should be aware that prescription and over the counter medicines could affect your ability to safely drive the taxi. Legislation requires the driver to monitor the use of medications and only drive where there is no adverse impact.

### 9.2 Security Threats

As a driver it's important to ensure your safety. If you are in any danger including from a passenger activate your M13 straight away to make emergency contact with Manly Independent Cabs base room. You can also liaise with Police and any other emergency services.

### 9.3 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.

- Be aware – animals are more active near waterholes and creeks, 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

### 9.4 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 Manly Independent Cabs

### 9.5 Faulty Safety Critical Equipment

All drivers are required to complete the daily vehicle safety check sheet (Attachment 2) prior to the start of the shift. Should any of the checks fail inspection a note must be made on the sheet regarding the defect and contact made to Manly Independent Cabs immediately to report the defect. Your vehicle will be inhibited and the fault will need to be rectified prior to the shift commencing.

### 9.6 Driver Fatigue

Refer to Manly Independent Cabs Fatigue Management Policy.

### 9.7 Driving Offences

Staying safe on the road is important for all driver's and their passengers. It is the driver's responsibility to ensure their own health and safety and ensure that their own acts or omissions do not adversely affect the health and safety of other persons such as their customer. Besides obvious injury consequences, there can be substantial financial consequences as well as loss of licence impacting quality of life.

Driving offences include, but not limited to:

- Speeding
- Crossing continuous dividing lines, except when making a lawful turn
- Crossing the centre line of a road on a curve or crest when unable to see if the way is clear
- Disobeying a hand signal or direction of a Police Officer, a Fire-Fighter, an Ambulance Officer or other authorised person
- Driver not wearing a seatbelt (appropriately restrained passengers or no passengers)
- Driving contrary to directions on road traffic signs
- Driving through a red light
- Driving through a yellow light
- Failing to give way to a public bus with indicator sign
- Failure to give way at a give way sign
- Failure to give way at a pedestrian crossing

- Failure to give way to a pedestrian or oncoming vehicle when turning at an intersection; or to a pedestrian or other vehicle when making a U turn
- Failure to give way to a vehicle on the right at an intersection
- Failure to give way to an emergency vehicle
- Failure to give way to vehicles on a roundabout
- Failure to give way to vehicles when approaching from a terminating road (T junction)
- Failure to slow down and move over when passing incident response vehicles with flashing lights • Failure to stop and give way at a stop sign
- Passenger not wearing a seatbelt
- Passing a vehicle which is giving way at a pedestrian crossing
- Wilfully causing excessive noise, smoke (e.g. a 'burnout')

## 9.8 Dangerous Driving

Make sure you know the posted speed limit, take into account road and weather conditions, the speed of other cars on the road and the presence of cyclists or pedestrians on the road. There are a number of factors that necessitate a lower driving speed. You must not drive faster than the speed limit shown in the circle. In poor conditions, it is safer to drive slower than the speed limit. Always use your signal before turning or changing lanes. If you plan on turning directly following an intersection, engage your signal while you are still in the intersection.

Drivers must travel at a safe distance behind the vehicle in front. If you tailgate you may not be able to safely stop in time to avoid a collision. Never drive while drowsy. If you begin to feel tired, pull the vehicle to the side of the road. Fatigue-related crashes are twice as likely to be fatal – drivers who are asleep can't brake. Being awake for about 17 hours has a similar effect on performance as a blood alcohol content (BAC) of 0.05

## 9.9 Driver and Vehicle Identification

All vehicles must be identified as being affiliated with Manly Independent Cabs and all drivers must have their Driver Authorisation identification card on display at all times while. Any passenger in your taxi has the right to request to see your driver identification. It must be in full view of each seating position in the vehicle.

## 9.10 Driver Fraud

All reports of fraud will be taken seriously, Black & White Cabs has a zero tolerance on fraud. Any allegations of fraud will be investigated and if deemed to be true the matter will be handed to the Police for further investigation.

All Cabcharge E-tickets should be processed at the end of the journey, you should never hold an E-ticket to be processed at a later date.

Extra cash out

Fraudulent use of any docket is a criminal offence. Any driver found using dockets fraudulently will be prosecuted. Drivers can assist in the reduction of docket fraud by:

- Ensuring that the amount on the meter and the amount on the docket are the same;
- Be aware of counterfeit dockets. Legal Cabcharge dockets are printed on both sides and check for perforation on the left hand side;
- Ensure correct charging when subsidies are applied (i.e. TTSS)



## 9.11 Driver Seatbelt

By law, all drivers must wear seatbelts if they are fitted in the vehicle. Seat Belts are designed to be used by only one person at a time. Doubling up, fastening a seatbelt around two people is both illegal and unsafe. Seatbelts must be worn on every trip, long or short.

## 9.12 Passenger Seatbelt

Children under the age of 12 months are not permitted to travel in a taxi unless they are secured in an approved child car seat, as follows

- Children aged less than 6 months: approved rearward facing restraint
- Children aged 6 months to less than 12 months: approved rearward or forward facing restraint with an inbuilt harness

Children over the age of 12 months are permitted to wear a seatbelt while travelling in a taxi – but parents or taxi service providers may wish to provide and use a child car seat. All wheelchair accessible taxis are required to carry an approved child car seat,

## 9.13 Driver assault on passenger

A Driver must always behave in an appropriate manner with passengers. A Driver must at no time verbally or physically touch or assault a passenger. The consequences for an assault on a Passenger could see the driver disaffiliated from Manly Independent Cabs as well as criminal charges laid.

## 9.14 Unlicensed Driver

It is the driver's responsibility to notify Manly Independent Cabs immediately if convicted of a disqualifying offense. Vehicle Fault Before starting your shift you are required to complete the vehicle checklist,

## 9.15 Vehicle Fault

Before starting your shift you are required to complete the vehicle checklist. If the fault prevents safe operation of the vehicle, it must be fixed prior to driving the vehicle.

Vehicle Accident

When involved in an accident –

- Drivers must establish the well-being of all occupants of the vehicles involved and contact emergency services in the event of any injuries being sustained;
- Obtain all details of other drivers involved including the name, address and driver licence number, the vehicle owner's details (if different to the driver) and registration number of the vehicles involved;
- The driver must not admit liability to any accident; and
- If possible, names and addresses of all passengers and/or witnesses should be obtained.

In the event of a road accident, one of the most important things to remember is to remain calm – do not panic. Someone's life could depend on it. The following procedures should be followed:

- Notify the Fleet Support Officer immediately via the dispatch system or mobile phone. The details will be recorded in the incident book;
- If injuries have occurred, ensure an ambulance is called immediately; and
- Render appropriate first aid only if you are qualified to do so.

It should be remembered that police must be called if anyone is killed or injured, there is damage to property other than the vehicles or damage to the combined vehicles exceeds \$2,000.00 and there is debate over who is at fault. If police are not required at the scene, it may be reported later to a police station. There are details which will be required for any insurance claims such as:

- Names and addresses of any witnesses (including passengers you may have in the taxi);

- Registration numbers of any other vehicles involved, names and addresses of the drivers, and names and addresses of the registered owners of the vehicles;
- Details of insurers of other vehicles involved;
- Names or numbers of any police officers who are in attendance;
- Damage to vehicles;
- Any other relevant details relating to the accident

You must stop after any accident and exchange these details with all other drivers involved.

You should not admit liability. Admitting liability may void your insurance.

## 9.16 Mechanical Failure

If your taxi has a mechanical failure while on shift try and follow the below mentioned steps

- Stop and park the vehicle in a safe place as far off the road as practical.
- Avoid stopping around blind corners, just over crests, on bridges or where roads are very narrow.
- Use hazard lights to warn other road users.
- In poor light, activate the parking lights.
- Report
- Do not attempt to repair the vehicle.
- If it is safe to do so, leave the vehicle and move behind a safety barrier if available. It is safer for the driver and passengers to keep away from the road and well clear of the vehicle, while waiting for help to arrive. If it is not safe to leave the vehicle, stay in the vehicle and buckle up the seatbelt.
- Exit the vehicle on the passenger's side. It is safer for the driver and passengers to exit the vehicle via the passenger side.
- Close the vehicle's bonnet once help has been arranged. If other drivers see an open bonnet they may stop to render assistance which could further compromise everyone's safety.

All taxis at some time, no matter how well maintained they are, can break down. Before calling for assistance, check the following:

- Do you have fuel
- Do you have battery power (check battery terminals are clean)
- You are in the correct gear position to start the car Eg; park or neutral
- Check the gas converter is not frozen or very cold (should be hot if the car is operating normally, if it is cold/frozen then the car may be low on water).
- Check the vehicle for overheating. If the vehicle has overheated do not drive it until the water has been refilled and you are sure that it is not leaking.
- If you have dual fuel, check that the fuel toggle switch (LPG/Petrol) is in the correct position.

If you cannot find the cause:

- Contact the Fleet Support Officer (via your radio) and request another taxi to take any passengers to their destination;
- The Fleet Support Officer will contact your operator or base if you request;
- Stay with the vehicle until assistance arrives

## 9.17 Robbery

Taxi drivers may have large amounts of cash in their vehicle, particularly towards the end of a shift, making them a target for robbery. If threatened, remain calm and cooperate with the assailant's demands. No amount of money or property is worth risking your life. Work health and safety for taxi drivers and operators What can be done? Drivers can help avoid robbery by:

- Always locking the taxi when alone in the vehicle or away from the taxi
- Minimising the amount of cash held in the taxi – leave it at home, or during breaks deposit it at a bank or well-lit automatic teller machine
- Never displaying money to passengers (when passengers are paying the fare only expose the float, keep the rest of the takings out of sight)

- Never telling passengers they have had 'a good night' in relation to fares or takings
- Promoting non-cash payments (credit cards or taxi vouchers)
- Not wearing expensive looking jewellery
- Not displaying expensive electronic items such as smartphones and electronic tablets
- Using distress alarms or other designated emergency communication devices if threatened.

## 9.18 Transporting Guide Dogs

A Driver must take a person if accompanied by a Guide/Assistance animal.

These passengers are entitled to the same courtesy and respect accorded to any other customer. The Legislation has been enacted which makes it an offence for a taxi driver to refuse service to a person who is accompanied by a Guide Dog/assistance animal that has been trained to give assistance to that person because of a disability.

**REMEMBER: No driver can refuse a passenger because they have a Guide Dog.**

## 9.19 Vision Impaired Passenger

If you suspect your passenger may need a hand, walk up, greet them and identify yourself. Ask them if they would like some assistance in accessing the vehicle. Listen to the reply and assist if required. Do not assume that the passenger is non-verbal or has low communication skills.

## 9.20 Elderly Passenger

Offer assistance if you believe it is required, don't be offended if your offer is declined. Be alert and sensitive to the environmental conditions that can affect the comfort of the passenger, this may include the temperature in the cabin, the volume of the radio and driving style.

## 9.21 Wet Weather

Below are tips to driving in wet weather

- Drive slowly—to avoid aquaplaning and skidding
- Drive with your lights on low beam (it is easier to see with low beam in fog)
- Use your air conditioner or demister to keep your windscreen clear of condensation
- Double the distance between you and the car in front
- Avoid braking suddenly or accelerating or turning quickly—to reduce your chances of skidding
- Do not drive on unsealed road
- Use road line markings to stay in the middle of your lane—in wet weather it is more important than ever to stay in the correct position on the road
- Do not drive on roads covered with water (even partially covered)
- Watch out for landslides—heavy rain can cause layers of rock and soil to move
- Stay away from stagnant water by the side of the road (it can be very bad for your health).

## 9.22 Lifting

The back is particularly vulnerable to manual handling injuries. Safety suggestions include controlling risk factors when loading luggage, in addition to personal controls. Lift and carry heavy loads correctly by keeping the load close to the body and lifting with the thigh muscles.

Never attempt to lift or carry loads if you think they are too heavy. When storing items in the boot, also give some consideration to how they are placed. Objects banging around are distracting and can damage the boot.

## 9.23 Driver Distraction (phone)

A driver of a vehicle can only touch a mobile phone to receive and terminate a phone call if the phone is secured in a mounting affixed to the vehicle. If the phone is not secured in a mounting, it can only

be used to receive or terminate a phone call without touching it (e.g. using voice activation, a Bluetooth hands-free car kit, earpiece or headset). It is illegal for the driver of a vehicle to create, send or look at a text message, video message, email or similar communication, even when the phone is secured in a mounting or can be operated without touching it.

## **9.24 Driver Distraction (Navigation)**

Distracted driving is characterised as the act of driving while engaging in other activities that divert the driver's attention away from the road. Distractions are shown to compromise the safety of the driver, passengers, pedestrians and people in other vehicles. It is the driver's responsibility to stay focused on the road whilst driving.

## **9.25 Driver Distraction (Unrestrained Objects)**

Never store objects in the drivers' foot well, under heavy braking or cornering these items can move and reduce your ability to use the pedals. Loose objects on the dashboard or centre console such as CD cases, loose change and mobile phones can be distracting as they slide around while cornering.

These items belong in the numerous storage compartments provided. Use the drink holders so you do not need to nurse a drink between your legs while driving. In some cars the drink holders are even conveniently located in front of the air-conditioning controls to keep cold drinks cold and hot drinks hot.

Be aware of what lurks under the driver's seat. An empty bottle, tennis ball, referdex or other object can also be moved from under the seat to under your feet. The Street Directory belongs in the map pocket. Never leave large objects unrestrained on the backseat. Often at the drive-thru bottle shop the attendant will place a carton of beer on your back seats. In a small crash this heavy mass could kill front seat occupants.

## **9.26 Reversing**

Before reversing a vehicle, the driver should walk around the vehicle checking for children, obstructions and that the reversing path is safe, before entering the vehicle. Once in the vehicle, always check your mirrors and over your shoulder before reversing. It's more difficult to control your vehicle when reversing than driving forwards, so you should never reverse for any more distance than is necessary.

## **9.27 Pickup Area**

When arriving to pick up your passenger always assess the area, take into consideration if the area the customer has requested is in a no stopping zone, on a blind corner or close to an intersection. In some instances you may be required to stop in more suitable area

## **9.28 Combined Weight of Wheelchair & Passenger**

Your Hoist has a maximum loading capacity of 300kg, this is the combined weight of the wheelchair and passenger.

## **9.29 Height and Width of Wheelchairs (For applicable Vehicles)**

A WAT Vehicle must contain a space, for each of the number of wheelchairs proposed to be carried by the vehicle, that is not less than the size of a rectangular prism with:

- A length of 1,300 mm (parallel to the centre line of the vehicle);
- A width of 800 mm;
- A height of 1,500 mm and;
- Have no intrusions into that space, other than adjustable restraint devices.

### 9.30 Driver Accessing Hoist

- Do not stand, or allow anyone else to stand in front of platform when lowering hoist
- Inspect hoist to ensure it is clean and free from defects
- Operator to stand on hoist lifting it to full level of vehicle, stepping towards back of wheelchair.

### 9.31 No Restraints

All wheelchairs and passengers are required to be restrained for every journey. The guidelines for transporting a wheelchair and its occupant are as follows

### 9.32 Not Controlling The Wheelchair

It is best practice to make sure you have one hand on the wheelchair at all times when loading and unloading.

### 9.33 Strapping Procedures Not Been Followed

#### 1. Attach the front restraints:

- Line up and lock anchorage into floor tracking at the front of the wheelchair;
- Attach restraints to the main frame of the wheelchair, they should anchor just outside the width of the wheels;
- Strap angle should be 45 degrees (or as close as possible), to the floor;
- Buckle clip should face outwards for easy removal;
- Push or drive the wheelchair backwards to take up the slack.

#### 2. Attach the rear restraints:

- Attach restraints to the main frame of the wheelchair, they should be attached inside the line of the wheels;
- Do not cross restraints over;
- Tension the slack;
- Test for stability.

**NOTE:** Always ensure that the wheelchair brakes are applied.

#### 3. Use the correct restraint:

- Use an approved restraint which has a direct connection to the floor;
- Passengers' own posture control belts are not sufficient unless they meet Australian Standards requirements.
- Attach the lap/sash or shoulder harness type seat restraint:
- Buckle the lap belt together;
- Pass the two ends down through the side panels of the wheelchair - not over armrests;
- Connect the ends of the lap belt to the floor anchorage;
- Adjust the lap belt firmly to fit – (check with passenger for correct seat belt tension).
- Lap belt must go across the pelvis, not abdomen. (Fit shoulder belt if deemed necessary).
- **Even if a wheelchair has a seat belt incorporated this is purely to assist in posture. The seat belts are not crash-tested therefore all passengers must have an external seatbelt secured to either the floor or shoulder anchor points.**

### 9.34 Worn Straps/Incomplete restraint kit

The straps used to secure the wheelchair in the taxi are an integral part of the safety system. The straps are too well looked after, do not secure straps over sharp objects or leave straps in positions where they may get jammed between metal locking mechanisms. Once the straps start to show signs of fraying it is time for them to be replaced.

### 9.35 Unsecured Objects Moving During Trip

The driver must ensure that there are no loose objects on or under seats. The potential dangers of loose objects in vehicles are strong. All drivers are encouraged to consider work health and safety practices in their workplace (the vehicle).

You should always keep the inside of your car clean and organized. Being aware of everything under your seat can prevent a car accident caused by a loose object. Empty bottles and various other objects can move from under the seat and cause a pedal jam and lead to a car accident. Also, never leave large objects unrestrained on the backseat. Even in a small car accident, a light object could go flying through the air, striking and killing the occupants. Large items should be placed to make sure that the maximum amount of surface area makes contact with the backseats. Stowing luggage any other way causes heavy force in an automobile accident.

Even the floor mats if properly designed can squash forwards as you get in the car, limiting or blocking your access to the pedals.

### 9.36 Clothing

Drivers should always be in uniform while on shift. The uniform consists of black trousers/shorts and a white shirt with the Manly Independent Cabs logo. Closed shoes are also required. **Sandals or thongs are not permitted.**

### 9.37 Pedestrians

As a driver, you will encounter pedestrians. Whilst driving, it is important that you remain aware of your surroundings. This includes pedestrians. As a driver, anticipate, plan ahead and approach all pedestrian crossings with care, always expect that someone will cross them.

### 9.38 Flooded Roads

Never drive through flood waters even if the car in front made it through or there is not a flooded road warning sign. This is extremely dangerous to the point of being life threatening.

### 9.39 Driver Health

Working long hours and shift work means that extra planning is required to ensure you eat well and get enough exercise to maintain your health and wellbeing. Eat high fibre, slow release foods which give you energy and keep you feeling fuller for longer. Reduce your intake of fatty, salty and sugary foods. Drink plenty of water and limit caffeine intake as caffeine will only keep you awake for short periods of time, but not if you are lacking sleep. Use your break or any spare moments to get out of the taxi, stretch and move around. On days off and between shifts exercise to keep yourself fit, as driving a taxi can be relatively inactive work.

### 9.40 Psychological Injuries

Unfortunately, there are many factors that can take a psychological toll on a driver when operating a Commercial Passenger Vehicle. They can have negative impacts and injuries including - but not limited to Psychological Injuries Unfortunately, there are many factors that can take a psychological toll on a driver when operating a Commercial Passenger Vehicle. They can have negative impacts and injuries including - but not limited to

Depression

- Post-Traumatic Stress Disorder (PTSD)
- Anxiety
- Poor worker health, both physical and psychological
- Breakdown of individual and team relationships
- Poor morale and erosion of worker loyalty and commitment
- Reduced efficiency, productivity, and profitability
- Poor public image and reputation

- Increased costs associated with counselling, worker assistance and mediation
- Increased absenteeism and staff turnover,

According to Safe Work Australia, there are several causes of such psychological injuries

- Job Demand: High and Low – It is not uncommon to work long hours in the transport industry which would fall under a “High” job demand. The reverse is also true is the form “Low” job demand with the ever increasing competition and lack of work
- Job Control: In the taxi and transport industry, it is near impossible to decide your client base. You never know who is going to be walking up to the vehicle. Also due to the ever changing legislation, vehicle operators and drivers constantly have to adapt the way they operate.
- Isolated and Remote Work: One unfortunate reality of operating a Commercial Passenger Vehicle is the lonesome work. Although you are transporting passengers all the time, you may not develop working relationships with most clients which can give the feeling of isolation.
- Violent or Traumatic Events: Both physical and psychological abuse can be inflicted from passengers. These include physical assault, fare evasion, theft, discrimination, hate speech, threats and many more.
- Recognition and Reward: When providing a service, you are constantly under the microscope of customers. In a world of “the customer is always right”, any actions you take and words you say are constantly being watched. It is important to maintain a professional demeanour and encourage a positive reaction from customers,

Manly Independent Cabs have several controls to help mitigate these risks. These include:

- Education on dealing with difficult customers
- Victims of Crime Policy: Follows a procedure to ensure that drivers involved in incidents, traumatic or otherwise, are monitored. From to lodgement of the incident right through to 2 weeks after the incident occurred including referrals to <https://www.victimsofcrime.vic.gov.au/> (policy available on request)
- M13 procedure: The ability to monitor and provide a layer of security to drivers and a form of prevention for customers
- M13 procedure: The ability to monitor and provide a layer of security to drivers and a form of prevention for customers
  - Duress Alarm
  - CCTV cameras
- Fatigue Management: To minimise any fatigue, workload and/or isolation related risks.

More information can be viewed on the Safe Work Australia website:

[https://www.safeworkaustralia.gov.au/system/files/documents/1901/workrelated\\_psychological\\_health\\_and\\_safety\\_guide.pdf](https://www.safeworkaustralia.gov.au/system/files/documents/1901/workrelated_psychological_health_and_safety_guide.pdf)

## 9.41 Customer Entering / Exiting Vehicle

The driver is responsible for ensuring the vehicle is safe for the passenger to enter and exit. The driver should assess the surroundings ensuring that the passenger can enter or exit the vehicle safely. The driver is to ensure all doors are closed before the vehicle is put into drive,

## 10 Fatigue Management

### 10.1 Background

Service providers are required to develop and maintain safety management systems that identify, record and manage risks associated with their services and are required to manage risks associated with their services.



One important risk is driver fatigue, and service providers will need to implement a fatigue management policy and program that ensures drivers are fit to drive at all times they are undertaking passenger services. This may include for example implementing policies regarding scheduling, shift duration, night driving and rest breaks.

Drivers must comply, so far as is reasonably practicable, with any reasonable instruction, safety policy or procedure of their service provider.

## 10.2 Identification of driver fatigue

Fatigue is an acute or ongoing state of tiredness that affects a person's performance, safety and health and requires rest and sleep for recovery.

The effects of fatigue include:

- **loss of alertness:** you may respond more slowly than usual to things as they arise. For example, it may take you longer to break or change lanes or gears. You may also find it harder to maintain your speed or keep inside your lane of traffic.
- **poor judgment:** fatigue affects your ability to think clearly. When you are fatigued you may be unaware of the impacts it can have on your judgement. Fatigued drivers may not be able to accurately assess risks and safely respond to changes in driving conditions.
- **drowsy driving:** tests have shown that fatigued drivers who feel "sleepy" or "drowsy" can drift in and out of sleep without even realizing. This is called "micro sleep". Micro sleep can last as little as 3 to 5 seconds but it can last longer. It can have fatal consequences.
- **falling asleep at the wheel:** drivers who are fatigued run the risk of falling asleep at the wheel. In those cases, the driver is often unaware of what has occurred until after the accident (assuming they are lucky enough to survive). This has also been the cause of numerous fatal accidents
- **poor memory:** fatigue affects your memory. Fatigued drivers may be unable to remember having driven long distances or what has occurred from one moment to the next.
- **mood changes:** if you are fatigued you are likely also to experience mood changes such as increased irritability, aggression and agitation. Fatigued people often overreact or react inappropriately to situations

If you show any of these signs, park in a safe place and take a break or nap.

***Drivers must not operate a taxi if fatigued.***

## 10.3 Warning signs of fatigue

Most people who are fatigued may not be aware of the effect it has on them or their driving skills so it is important to know the early warning signs of fatigue.

If you experience any of the following, you may be fatigued:

- you have trouble keeping your head up;
- you find yourself day-dreaming for long periods;
- your eyes close for longer than it takes you to blink;
- you have blurry vision;
- you cannot stop yawning;
- your eyes are sore or dry;
- you cannot remember driving over the last few kilometres;
- you have headaches or feel dizzy;
- you find yourself upset or worked-up over small events that occur while you are driving;
- you miss your exit when driving or miss gear changes;
- you start to see things that aren't there;
- you fail to slow down or respond appropriately to driving changes or hazards (such as braking too late or over-steering); or
- you increase or decrease your speed without noticing.



It is possible to see some of the signs of fatigue in someone else. For example, if you notice that a driver is yawning excessively, rubbing their eyes or is forgetful or irritable, they may be fatigued.

## 10.4 Managing fatigue

### 10.4.1 Before driving:

- Get a good night's sleep
- Where possible, avoid driving between midnight and 6:00am, when your body naturally wants to sleep
- Plan regular breaks
- Know the early warning signs of fatigue - yawning, sore eyes, difficulty concentrating, restlessness, oversteering
- Find out if any medicine you are taking may affect your driving.

### 10.4.2 While driving

- Take regular breaks
- If you start to feel tired, or experience any early warning signs, pull over somewhere safe and take a nap - 15-20 minutes works best

### 10.4.3 Working hours

In any 24 hour period, when logging on to the network at the shift length will be set to 12 hours. That means if a driver logs on at 6.00am, the shift will terminate at 6.00pm.

The driver must take regular breaks as follows:

In any period of	Driver must not work more than	Take a minimum break of
5½ hours	5¼ hours work time	15 continuous minutes rest time
8 hours	7½ hours work time	30 minutes rest time in blocks of 15 continuous minutes
12 hours	11 hour work time	60 minutes rest time in blocks of 15 contiguous minutes

When taking a break, the driver shall log out of the network for the duration of the break and log back into the network when recommencing work. The length of the shift will be extended by the length of the break to a maximum 15 hours from the time of the initial log in.

All breaks must be documented on the driver worksheet.

A driver must not operate the taxi longer than 15 elapsed hours from initially commencing a shift and must have a minimum break of six hours before starting the next shift.

## 11 Driver Acknowledgement

I acknowledge that:

1. I have been instructed in the Manly Independent Cabs Safety Management System.
2. I have been given the opportunity to ask questions and confirm that I fully understand the contents.
3. By signing below, I agree to fully comply with the Manly Independent Safety Management System.

**DRIVER**

...../...../20.....  
Print Name                      Driver\                      Signature                      Date  
   Authority No.

**WITNESS**

...../...../20.....  
Print Name                      Signature                      Date