

### Response to the New South Wales State Insurance Regulatory Authority (SIRA) consultation on *Personal injury insurance* arrangements for food delivery riders in the gig economy

#### May 2021

#### Introduction

Deliveroo welcomes the opportunity to make a submission to the State Insurance Regulatory Authority (SIRA) on injury insurance arrangements for food delivery riders in the gig economy.

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 10,000 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 19,000 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.

We welcome the comments from the Minister for Digital and Minister for Customer Service, Victor Dominello, that self-employed workers in the gig economy should be protected by injury insurance. Deliveroo was the first business globally to recognise the need to provide self-employed riders with insurance cover, free of charge. We have always provided accident insurance to riders while they are completing orders with us. In Australia, this was originally done through the WorkCover scheme. However, in October 2019, we moved to a bespoke rider accident insurance and income protection policy (see more detail on this below) as we believe this provides a better level of cover for riders.

Deliveroo would be happy to provide further information to SIRA for the purpose of this consultation if the Authority would find it helpful. We would also be willing to meet to discuss the contents of our submission and provide further context and detail if needed.

To help provide an informative and useful response to this consultation we have set out background information on the Deliveroo self-employed model. We think this is important context for the discussions around insurance for food delivery riders at Deliveroo and other gig economy platforms.



#### **Background**

#### 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. This is very different to traditional forms of work, where employees have set hours of work or rosters which are scheduled according to their terms of employment (including any applicable industrial instruments).
- (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 November 2020 to 30 April 2021 inclusive), riders across Australia rejected 53.6% of all delivery orders at least once.

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 Survey¹ 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.

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

<sup>&</sup>lt;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.



#### 1. What benefits and entitlements are the most important to food delivery riders?

The personal accident cover Deliveroo provides riders across Australia includes a number of benefits and entitlements, for example, in the event of accidental death and permanent disablement, weekly benefit - bodily injury (income protection), fractured bones, loss of teeth or dental procedures, coma and reconstructive or cosmetic surgery. In addition, it provides income protection in the eventuality that a rider cannot work due to an accident caused while logged into the app. It also provides return to work assistance, funeral expenses, dependent child supplement, chauffeur services, emergency home help, workplace assault benefit, accomodation and transport expenses and out of pocket expenses. Of these benefits and entitlements, the insurer's claims data shows that the policy we have in place properly responds to the needs of riders.

Of the incidents that occur which lead to a claim by a Deliveroo rider, 75% are CAT 3 (minor incident or petty theft) and 25% are CAT 2 (serious injury). We have never had a CAT 1 (death or permanent disability) incident. Anecdotally, the most common types of incidents are slips or falls from a bike or scooter (e.g. when crossing tram tracks) leading to cuts and bruises; vehicle rear-ending leading to cuts, bruises and/or fractures; and assault. Generally, the feedback on our policy is positive and riders tell us that income protection is the most important component.

It is vital that riders have confidence that when they log onto the Deliveroo rider app and carry out deliveries they have insurance in place that covers the specific risks of their work and there is no confusion about what will be covered by the insurance. At Deliveroo, we promote awareness of the cover, both at onboarding when riders first join the platform and with information on our bespoke rider website (see <a href="here">here</a>), including the link to the insurer's own site where riders can find the full detail of the policy and information on how to make a claim (see <a href="here">here</a>). In addition, our rider support team plays an important role signposting riders to the correct place online to be able to make a claim in the event of an accident.

As previously mentioned, Deliveroo has always provided accident insurance to riders while they are completing orders with us. Originally this was done through workers' compensation schemes. In 2019 we investigated whether state based WorkCover 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 claims were rejected by workers' compensation insurers in different States and Territories, which was of great concern to us. In particular, 8 claims were rejected in NSW in 2019 because it was determined they were not employees, or were delegates (see next point below).
- Many riders delegate their account to others who use it to conduct deliveries, and these delegates are not covered by workers' compensation.
- Many riders multi-app or work in other jobs alongside providing services to Deliveroo.
   Some workers' compensation schemes are not designed to provide insurance to an individual (contractor/sole trader) whose Deliveroo's earnings are only a portion of their overall income.



 Workers' compensation 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 to ensure riders are protected as they travel home.

Since October 2019 we have provided our own income protection and personal injury insurance for all riders, and their delegates (who a rider may have appointed to complete the delivery on their behalf, something which wasn't always the case with workers' compensation protection, as above); and public liability insurance for motorised vehicle riders (when the the rider is off their vehicle) as well as cyclists (as they are not covered by compulsory third party insurance). The policy starts as soon as a rider logs onto the Deliveroo rider App, up until 1 hour after their last delivery, no matter who they are delivering for at the time. As detailed above, the policy includes death and permanent disability compensation, payable to the family. The insurance is completely free for riders and applies to riders on all vehicle types.

The insurance Deliveroo currently provides, as set out in this answer, is the category of coverage we believe all riders in Australia should be entitled to. This should be provided by individual platforms who fund and manage the insurance for riders.

For more information on our insurance policy, please visit: https://deliveroo.marshadvantage.com.au/group-personal

## 2. What insurance pricing principles should be applied to the options and what is their likely impact? How should safe work practices be best incentivised?

Three key insurance pricing principles that should be applied are: i) pricing should be commensurate to the risk, ii) flexibility iii) appetite and desire to compete.

- i) Insurance pricing should be commensurate with the risk being covered, for example, we pay a premium for each hour that our riders are logged on. This means that we are able to provide bespoke cover for our riders that matches their individual needs and protects them for the specific risks being presented. Equally, as a group the price should reflect the overall risk profile and provide credit for initiatives that reduce the frequency or severity of incidents.
- ii) Our insurance cover recognises that as a community our riders are all very different. Some riders log on once a week to do a small number of orders, some log on every day to make lots of deliveries and some might work for more than one platform or another job. Many riders enter into commercial arrangements with individual delegates. Insurance cover needs to reflect this, as ours does.
- iii) A key element to getting the best insurance cover for riders is the principle of competition. Providing our own insurance for riders, as opposed to coverage under the workers' compensation scheme, means we can go out to the insurance market and contact multiple insurers to get the best product available; the best benefits and entitlements and the best service levels for riders with the additional benefit of getting a competitive rate of pricing for the cover we provide. We have seen how this competition has driven improved insurance for riders where individual insurers have come back with additional add-ons to the product in



order to win the bid e.g. mobile phone cover or family benefit to cover costs to visit riders in hospital.

#### How should safe work practices be best incentivised?

Rider safety is at the forefront of all that we do and we have a number of robust measures in place to help riders stay safe while working. This includes our onboarding program where all riders must complete health and safety online learning modules according to their nominated vehicle type and location before their account is activated. 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 source and supply highly visible kit, which includes a reflective shell jacket with removable layers, and two different sized reflective food courier bags. Additional kit is offered depending on the vehicle type the rider uses and we also replace damaged or worn out items for free to active riders.

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. The top 5 pages on the Hub have been translated into Hindi, Portuguese and Spanish to ensure the material is easily accessible and understood by riders for whom English is a second language.

Following the rider fatalities in 2020, we looked at what more we could do, and added comprehension questions at the end of the learning modules so riders could reflect on what they learnt. We also produced short video content on safety topics and distributed high visibility vests to motorbike and scooter riders.

As an active member of the SafeWork NSW Joint Task Force we submitted the list of actions taken for inclusion in the Industry Action Plan and also provided our feedback on the WHS Guidelines.

Extending our focus on safety further, we have also launched our Winter Rider Safety Campaign for May and June which goes above the regular safety measures in place. The campaign includes weekly themed communications, safety kit bundles, safety videos, educational events and a new podcast series called *Rider Safety Matters* specifically dedicated to discussing issues around rider safety. The primary purpose is to ensure Deliveroo riders feel confident and safe while completing deliveries during the winter months, and encouraging riders to prioritise safety at all times.

The educational events program will be run in collaboration with, and facilitated by, Deliveroo partners including bespoke first aid sessions with the Australian Red Cross, road safety with the Victorian Transport Accident Commission, vehicle maintenance with Reid Bicycles, Verified Autoshop and Scooterama, and personal safety with Victoria Police.

In April 2021, Deliveroo kicked off its second Rider Safety Advisory Panel. Originally launched in August 2019 (with subsequent events delayed until April 2021 due to Covid),



The Rider Safety Advisory Panel is an initiative that offers riders independent representation and focuses on improving safety for Deliveroo's fleet of riders across Australia.

While Deliveroo fulfils its obligations under the state WHS Acts, and goes above and beyond what is required, ultimately there is also a personal responsibility that sits with the rider. As a Person Conducting a Business or Undertaking (PCBU), the rider also has obligations under the NSW WHS Act. Non-compliance can lead to a written warning from Safework NSW and this may be a useful counter incentive to encourage riders to undertake safe practices at all times while performing deliveries.

#### 3. What is the preferred funding arrangement and key considerations? and why?

Deliveroo believes the best approach is a platform funded and managed insurance program where each platform is required to provide its own cover for riders carrying out deliveries.

Insurance schemes need to be bespoke to the self-employed work being undertaken and should therefore be offered, arranged and funded by the businesses with whom food delivery riders undertake work. This ensures riders receive the insurance designed for the specific situations of their work, and the certainty of the protection they deserve.

Platforms have an existing relationship with their riders, they know the intricacies of when and how long they are online and how many orders they carry out, i.e. platforms have a detailed understanding of the risk being presented and therefore the level of cover needed for riders.

Platform managed and funded insurance allows for a simple process for riders to follow. Existing channels of communication between individual platforms and the riders that use them means key information about the insurance can be shared with riders. This approach reduces red tape and makes the insurance easily accessible for riders in the event that they need to make a claim.

Rider welfare should be central to any insurance program and the needs of riders paramount in any decision making around the model of insurance selected. Deliveroo has chosen to take out its own cover for riders as opposed to using WorkCover because there were a number of instances<sup>3</sup> in the past where workers' compensation claims were rejected, which was of great concern to us.

Our platform funded insurance is bespoke and expressly covers riders whenever they are logged onto the Deliveroo rider app, regardless of whether they are actively on an order or even carrying out an order for a competitor. It applies to all riders and their delegates, it doesn't matter how much or little they work with us, how many other companies they work with, how much they choose to delegate or how much of their income derives from Deliveroo. It provides benefits that apply consistently regardless of which territory the rider chooses to provide services in. This gives riders certainty as to when they are protected and doesn't penalise riders for exercising their contractual rights to delegate or multi-app.

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<sup>&</sup>lt;sup>3</sup> 8 claims were rejected by NSW WorkCover and another 4 in other jurisdictions in 2019.



It is vital that all workers, whether employed or self-employed food delivery riders, have the protection they deserve at work. We believe our platform funded insurance policy provides riders with just that.

Another consideration is that Deliveroo, and all food delivery platforms, operate nationally. A bespoke solution in NSW that is not aligned with the insurance programs that we, and others, apply nationally, will have flow on administrative costs to each business.

# 4. What are the current private insurance policy protections, costs and administration arrangements? What are current private insurance challenges for food delivery riders?

Deliveroo uses an independent insurance broker who has assisted us in this response.

- Platform acquired & complimentary Rider Insurance Personal Accident Insurance typically comprises three baskets of cover (Accidental Death & Disability Capital Benefits, Total & Temporary Disability Weekly Benefits & various Lump Sum Benefits).
- As riders are independent contractors they can access various independent general, life & health insurance protections including individual personal accident covers, life insurance, income protection, private health insurance & public liability.
- Acquisition costs via platform purchased covers allows for better leverage with the private insurance market, while also providing uniformity and fully tailored & bespoke coverages to meet the requirements and needs for riders.
- Platform acquired cover provides certainty of cover across all riders and removes the burden for individual riders to not need to source, maintain and purchase their own insurance protection.

#### How the program functions:

 The current insurance program is provided via a broker who, in addition to offering superior market access and placement capabilities, is able to provide on-going servicing and support. This allows for quick responses to queries about the insurance as well as quick claims support and settlement.

#### Current challenges:

 Current challenges for food delivery riders are a lack of consistency and absence of minimum standards in Group Personal Accident cover across platforms in the food delivery sector.

Our decision to provide income protection and personal injury insurance for all riders was due to the fact that the existing WorkCover scheme is not suitable. As mentioned, our policy is bespoke and provides riders with the policy protections they deserve, including whenever they are logged onto the Deliveroo rider app, regardless of whether they are actively on an order or even carrying out an order for a competitor. It applies to all riders and their delegates, it doesn't matter how much or little they work with us, how many other companies they work with, how much they choose to delegate or how much of their income derives from Deliveroo. It provides benefits that apply consistently regardless of which territory the rider



chooses to provide services in. This gives riders certainty as to when they are protected and doesn't penalise riders for exercising their contractual rights to delegate or multi-app.

Given how riders work in practice, we believe a workers compensation based scheme, designed for traditional employment and which envisages a very different way of working from that undertaken by our riders, is not suitable.

# 5. What are the risks/benefits of private underwriting and service delivery by licensed insurers compared with public underwriting and service delivery for any newly developed personal injury scheme?

Deliveroo uses an independent insurance broker who has assisted us in this response.

Benefits of private underwriting and service delivery by licenced insurers:

- Fast claim turnaround which is critical for self-employed people like food delivery riders
- The flexibility of the policy results in innovative covers because of the opportunity to tailor the product to suit the needs of riders e.g. out of pocket expenses, accommodation and transport cover.
- Superior risk analysis and price accuracy i.e. the alignment of the premium to pay out is superior because the price of the cover reflects the specific risk profile and risk trends of riders.
- Specialist insurers and brokers with segment specific expertise.
- Access to global knowledge, data analytics and market trends.
- Adoption of best practice i.e. learnings from one market help to inform cover in another market.
- Technology enhancements to improve user experience e.g. the dedicated portal (see <a href="here">here</a>) to speed up process of making claims
- Consistency of cover across the fleet irrespective of where in Australia a rider is located.

### 6. What scheme design features of any new personal injury insurance scheme are critical to minimise administrative costs and disputation levels?

Deliveroo uses an independent insurance broker who has assisted us in this response.

As set out below, in question 7, Deliveroo believes gig economy platforms should be providing personal injury and income protection insurance for their food delivery riders. We think this is the best approach for riders, the platforms and regulators.

Critical features of a personal injury insurance scheme include:

Speed and continuity of service of claims assessment and settlement. i.e. identified
designated case handler for the duration of the claim. The claims provision needs to
be aligned with the way Deliveroo supports riders more generally. This means
services are interlinked so that when a rider contacts Deliveroo about making a claim
they are given information about what to do and where to go online.



- Expedited case management and dedicated rehabilitation and recovery claims handlers.
- Fast release of funds for lump sum benefits, which is essential for self employed people like food delivery riders.
- Insurance solution recognises that freelancers may offer their services to more than one platform.
- Any new scheme in isolation to a national program (as currently managed by Deliveroo) would create additional administration in handling claims across different policies.
- National coverage and consistency to eliminate disputes that might otherwise arise.
   i.e. disputes would be expected to arise if there is varying coverage between different state jurisdictions.

#### 7. Do you have a preferred model and why?

Deliveroo's preferred model is option 2 - Require gig platforms to provide personal injury insurance for their food delivery riders; sourced from the insurance market and complying with prescribed minimum standards for death and disablement, income supplementation and out of pocket expenses.

We believe that requiring gig platforms to provide insurance themselves is the right approach. Rider safety is at the forefront of all that we do and ensuring that riders have appropriate insurance while they are out making deliveries should not be optional. No business should make a commercial decision to not have insurance in order to save money. As previously highlighted, Deliveroo was the first business globally to recognise the need to provide self-employed riders with insurance cover, free of charge. We have always provided accident insurance to riders while they are completing orders with us. This was initially done through the WorkCover scheme but we moved to our own accident insurance and income protection policy in October 2019 (as detailed above).

As previously stated, insurance schemes need to be bespoke to the self-employed work being undertaken and should therefore be offered, arranged and funded by the businesses with whom food delivery riders undertake work. This ensures riders receive the insurance designed for the specific situations of their work, and the certainty of the protection they deserve.

Requiring individual platforms to provide insurance also takes into account the different safety practices of different platforms. Platforms have an existing relationship with their riders, they know the intricacies of when and how long they are online and how many orders they carry out, i.e. platforms have a detailed understanding of the risk being presented and therefore the level of cover needed for riders.

Platform managed insurance allows for a simple process for riders to follow. Existing channels of communication between platforms and riders means key information about the insurance can be shared with riders. This approach also reduces red tape and makes the insurance easily accessible for riders in the event that they need to make a claim.



As a minimum standard, we believe that death and disablement, income supplementation and out of pocket expenses should be included and mandatory components of the insurance cover. The level of cover that is provided for each component should be developed in consultation with the food delivery platforms.

It is paramount that all workers, including self-employed food delivery riders, have the protection they deserve at work. We believe our platform funded insurance policy provides riders with just that and we urge others in this sector to do the same.

#### Why the other options are not suitable:

Option 1: Maintain the status quo with increased education and awareness about existing personal injury and income protections.

While increased education and awareness about insurance would be welcome, we believe all gig platforms should be required to provide insurance for their food delivery riders. Option 1 does not go far enough in our opinion. An education and awareness program could be rolled out to complement Option 2.

Option 3. Establish a scheme to provide a personal injury insurance safety net for food delivery riders.

An insurance safety net scheme for riders would likely create an unnecessarily complex and potentially confusing system for riders to negotiate. Riders need to have certainty of protection from their insurance cover and a two tier system (as a safety net scheme would likely create) would do the opposite of this. In addition, deciding how to fund a safety net system like this could become extremely complicated. On what basis would individual platforms contribute given that riders might be registered with a platform but never log on, they might log on but never accept and complete an order, or riders might be logged on to multiple apps simultaneously.

Option 4. Establish a scheme to provide personal injury insurance to food delivery riders modelled on motor accidents (CTP) scheme benefits.

It is paramount that all riders have the protection they deserve at work. We believe riders need full cover not just a CTP based insurance product to give them confidence that while they are out making deliveries they are fully covered.

The insurance scheme needs to be bespoke to the self-employed work being undertaken and it needs to cover the specific risks of the work being carried out by riders. A CTP scheme would not do this in the same way that a bespoke product does. CTP insurance appears to operate only for motor vehicle drivers but we have riders using non-motorised vehicles e.g. bicycles, and we cannot see how a CTP scheme would be able to respond to a diverse fleet of riders like Deliveroo's.

In addition, the cost of the insurance needs to be commensurate with the risk being covered, eg at Deliveroo we pay a premium for each hour that riders are logged on. This would not be possible under a CTP scheme.



Finally, riders must have appropriate motor insurance including for commercial food delivery use. Therefore riders registered with Deliveroo would already have the benefit of CTP insurance.

Option 5. Establish a scheme to provide personal injury insurance for food delivery riders modelled on workers compensation protections.

Given how riders work in practice, we believe a workers compensation based scheme, designed for traditional employment and which envisages a very different way of working from that undertaken by our riders, is not suitable.

Deliveroo has experience of using workers' compensation schemes to provide insurance for riders and, since 2019, a bespoke insurance product (as noted previously). We moved to our own income protection and personal injury insurance for all riders (and their delegates) because there were a number of reasons why workers' compensation did not provide appropriate cover:

- Food delivery riders are not employees, and there were a number of instances where claims were rejected by workers' compensation insurers in different States and Territories, which was of great concern to us.
- Many riders delegate their account to others who use it to conduct deliveries, and these delegates are not covered by workers' compensation.
- Many riders multi-app or work in other jobs alongside providing services to Deliveroo. The workers' compensation scheme is not designed to provide insurance to an individual whose Deliveroo's earnings are only a small portion of their overall income. This is because of the income test that is applied when claims against workers' compensation schemes are assessed.
- Workers' compensation 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 to ensure riders are protected as they travel home.
- Riders use multiple apps at any one giving rise to significant complications around the calculation of compensation as well as the calculation of premiums.

On this basis, we believe a scheme modelled on workers compensation protections will not provide adequate insurance for riders in the gig economy.

Option 6. Extend the existing workers compensation scheme to cover food delivery riders by deeming food delivery riders as "workers" for the purposes of workers compensation legislation.

The very fact that extending the existing workers' compensation scheme to workers in the gig economy is being considered demonstrates that the scheme is an inappropriate fit for self employed workers.

As detailed above, under *Option 5*, Deliveroo has experience of using workers' compensation schemes to provide insurance for riders and, since 2019, a bespoke insurance product. We moved to our own income protection and personal injury insurance for all riders (and their delegates) because there were a number of reasons why workers'



compensation did not provide appropriate cover. Those reasons are repeated here for simplicity:

- Food delivery riders are not employees, and there were a number of instances where claims were rejected by workers' compensation insurers in different States and Territories, which was of great concern to us.
- Many riders delegate their account to others who use it to conduct deliveries, and these delegates are not covered by workers' compensation.
- Many riders multi-app or work in other jobs alongside providing services to Deliveroo. Some workers' compensation schemes are not designed to provide insurance to an individual whose Deliveroo's earnings are only a small portion of their overall income.
- Workers' compensation 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 to ensure riders are protected as they travel home.
- Riders use multiple apps at any one giving rise to significant complications around the calculation of compensation as well as the calculation of premiums.

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. Indeed, the type of work that riders do is so unique that off the shelf insurance schemes do not provide adequate protection. Insurance needs to be bespoke to the risk being presented and the insurance pricing should be commensurate with the risk being covered. For example, as noted previously, we pay a premium for each hour that our riders are logged on. This means that we are able to provide bespoke cover for our riders that matches their individual needs and protects them for the specific risks being presented. Equally, as a group the price should reflect the overall risk profile and provide credit for initiatives that reduce the frequency or severity of incidents.

Governments can help self-employed workers in the gig economy by requiring businesses to provide insurance cover for riders using their platforms to ensure those riders get insurance designed for the specific situations of their work, and the certainty of the protection they deserve.

[ENDS]