Review of the National Heavy Vehicle Driver Competency Framework
Review of the National Heavy Vehicle Driver Competency Framework

Prepared by
Judy Oswin and Geoff Cotton

Project Manager
Clare Heathcote

Abstract
The report reviews the National Heavy Vehicle Driver Competency Framework and its adoption or otherwise by states and territories. A number of areas for consideration by Austroads are identified including increased focus on or inclusion of additional competencies; minimum training duration and consideration of a practical experience requirement. The relationship between licensing regulator oversight and VET sector oversight of outsourced provision is considered. Minimum requirements for outsourced trainers and assessors are discussed. Auditing and review requirements of outsourced service provision are considered.

About Austroads
Austroads is the peak organisation of Australasian road transport and traffic agencies. Austroads’ purpose is to support our member organisations to deliver an improved Australasian road transport network. To succeed in this task, we undertake leading-edge road and transport research which underpins our input to policy development and published guidance on the design, construction and management of the road network and its associated infrastructure.

Austroads provides a collective approach that delivers value for money, encourages shared knowledge and drives consistency for road users.

Austroads is governed by a Board consisting of senior executive representatives from each of its eleven member organisations:
- Roads and Maritime Services New South Wales
- Roads Corporation Victoria
- Queensland Department of Transport and Main Roads
- Main Roads Western Australia
- Department of Planning, Transport and Infrastructure South Australia
- Department of State Growth Tasmania
- Department of Infrastructure, Planning and Logistics Northern Territory
- Transport Canberra and City Services Directorate, Australian Capital Territory
- The Department of Infrastructure, Regional Development and Cities
- Australian Local Government Association
- New Zealand Transport Agency.

Keywords
Heavy vehicle; Driver licence; Competency; Registered Training Organisation; Vocational and Educational Training; Outsourced providers; Outsourced service provision; Audit; Approved assessors; Approved trainers; Accreditation; Licence progression

ISBN 978-1-925671-36-0
Austroads Project No. SRL2076
Austroads Publication No. AP-R564-18
Publication date May 2018
Pages 91

© Austroads 2018
This work is copyright. Apart from any use as permitted under the Copyright Act 1968, no part may be reproduced by any process without the prior written permission of Austroads.

Acknowledgements
The input of ARRB to this report is acknowledged. The assistance of heavy vehicle driver training providers and assessors; heavy vehicle industry associations and individual heavy vehicle operators in contributing to the analysis underpinning this report is appreciated.

This report has been prepared for Austroads as part of its work to promote improved Australian and New Zealand transport outcomes by providing expert technical input on road and road transport issues.

Individual road agencies will determine their response to this report following consideration of their legislative or administrative arrangements, available funding, as well as local circumstances and priorities.

Austroads believes this publication to be correct at the time of printing and does not accept responsibility for any consequences arising from the use of information herein. Readers should rely on their own skill and judgement to apply information to particular issues.
Summary

The National Heavy Vehicle Driver Competency Framework (the Framework) was approved by Ministers in 2011 and has been implemented in three jurisdictions, with a further jurisdiction planning introduction in 2018. Remaining jurisdictions continue to offer a combination of outsourced and insourced licence assessment based on state and territory specific standards.

This review of the Framework has identified a range of areas where competencies need to be added or strengthened. Importantly, it has identified that the standard of training, and supporting assessment, is often inadequate with offerings of less than a day to obtain a heavy vehicle licence. Establishment of mandated training times and content have been recommended to ensure at least a minimum standard of skill development.

While there is some level of oversight offered through the Vocational Education and Training (VET) sector, it is insufficient to ensure the quality and integrity of outsourced licensing services. Transport regulators need to take an active role in setting and monitoring standards. There are a range of commercial pressures, as well as opportunity for fraudulent behaviour, that present risks to the integrity of licensing related services. A range of entry based controls as well as active ongoing monitoring is needed to reduce this risk to an acceptable level and this requires an adequate level of regulator resource and targeted visible activity.

Although there are issues with the VET sector, a training based approach to heavy vehicle driver skill development is recommended as a preferred approach, with the VET sector the best placed to offer this service. Licensing regulators need to develop an ongoing active relationship with the Transport and Logistics Industry Skills Council to ensure that the training courses reflect regulators’ requirements. The development of specific training to skill trainers and assessors in licensing competencies and requirements as well as a program of assessment moderation is also necessary.

Current licence progression is based on time served on lower licence classes. An approach that recognises competency as opposed to time served is recommended however it must be based on genuine skill development to ensure safety outcomes. While time served does not of itself develop skills, practical on road supervised experience is highly regarded by industry. The inclusion of minimum supervised driving hours, similar to that required in most jurisdictions for young drivers, would be a useful addition to heavy vehicle licensing requirements.

A review of the Framework to cater for both insourced and outsourced delivery and to provide an equivalent level of competency attainment, under a training or test based approach to assessment, is recommended. In moving the Framework forward there must be recognition of jurisdictional specific requirements, however promotion of nationally consistent high quality heavy vehicle licensing standards should be the focus.
Contents

Summary ......................................................................................................................................................... i

1. Background ........................................................................................................................................... 1
   1.1 Factors Contributing to Framework Review .................................................................................... 1
   1.2 Scope .............................................................................................................................................. 1
   1.3 Methodology .................................................................................................................................... 2

   2.1 Variation in Existing Jurisdictional Arrangements ........................................................................ 3
   2.1.1 Heavy Vehicle Classes and Licence Progression ........................................................................ 4
   2.1.2 Requirements and Mechanism for Determining Competency ................................................. 6
   2.2 Value of Experience ....................................................................................................................... 7
   2.3 A Path to Greater Consistency ..................................................................................................... 8
   2.3.1 Practical Test Only or Progressive and Final Assessment ....................................................... 8
   2.3.2 Outsourcing versus Insourcing of Licence Assessment ............................................................ 8
   2.4 Key Themes and Findings ............................................................................................................. 9

3. Dual Regulation – VET and Licensing ............................................................................................... 10
   3.1 Training Related Entities ............................................................................................................... 10
   3.1.1 AISC .......................................................................................................................................... 10
   3.1.2 VET Regulators ....................................................................................................................... 10
   3.1.3 Industry Training Package Developers .................................................................................... 11
   3.1.4 Registered Training Organisations .......................................................................................... 11
   3.2 Competency Based Training ......................................................................................................... 11
   3.2.1 Understanding Competency .................................................................................................... 12
   3.3 The Framework and Training Providers ....................................................................................... 12
   3.4 Is VET Regulation Sufficient? ...................................................................................................... 13
   3.5 Additional Licensing Regulator Controls ..................................................................................... 14
   3.6 Is VET Regulation Required ........................................................................................................ 15
   3.6.1 Training ..................................................................................................................................... 15
   3.7 Utilisation of Approved Industry Training .................................................................................... 16
   3.8 Key Themes and Findings ............................................................................................................. 17

4. Governance of Outsourced Service Provision .................................................................................. 18
   4.1 Rules .............................................................................................................................................. 19
   4.1.1 Defining Competencies and Assessment Standards ................................................................. 19
   4.1.2 Minimum Requirements to be an Approved Provider ............................................................. 19
   4.1.3 Minimum Requirements to be an Approved Assessor ............................................................ 19
   4.2 Relationships, Systems and Processes .......................................................................................... 20
   4.2.1 Approved Assessors .................................................................................................................. 20
   4.2.2 Approved Providers ................................................................................................................... 20
   4.3 Regulator Controls ....................................................................................................................... 21
   4.3.1 Monitoring of Approved Providers ........................................................................................... 21
   4.3.2 Monitoring of Approved Assessors ........................................................................................... 22
   4.4 Management of the Framework ................................................................................................... 22
   4.5 Key Themes and Findings ............................................................................................................. 22
5. Heavy Vehicle Driver Competency ........................................................................ 23
   5.1 Safety and Competency .................................................................................. 23
   5.2 Core Driver Competency Elements ................................................................ 23
       5.2.1 Competency Under the Framework ......................................................... 24
       5.2.2 Comparison of Training and Licensing Units of Competency ............... 24
       5.2.3 Safety Factors - Research ..................................................................... 27
       5.2.4 Vehicle and Related Technology .............................................................. 29
       5.2.5 Industry Input .......................................................................................... 29
   5.3 Driver Competency and Job Skills .................................................................. 30
       5.3.1 Heavy Vehicle Driving Task ................................................................. 31
       5.3.2 Other Available Training ........................................................................ 32
       5.3.3 Role of Employers .................................................................................. 33
       5.3.4 Implications for Licensing ..................................................................... 34
   5.4 Key Themes and Findings ............................................................................. 35

6. Adequacy of Current Training and Assessment .................................................... 36
   6.1 Course Duration ............................................................................................. 36
       6.1.1 Adult Learning ......................................................................................... 36
       6.1.2 Nominal Hours ....................................................................................... 37
   6.2 Training Resources ......................................................................................... 39
   6.3 Capabilities of Trainers and Assessors ............................................................. 40
       6.3.1 RTO Standard Mandated Qualifications ............................................... 40
       6.3.2 Transport Regulator Requirements ....................................................... 40
       6.3.3 Individual RTO requirements ................................................................. 41
   6.4 Licence Assessment ......................................................................................... 41
       6.4.1 Gaming the licence assessment system .................................................. 42
       6.4.2 Conditions Under Which Assessment Occurs ....................................... 42
   6.5 Impacts of Outsourcing .................................................................................. 43
   6.6 Key Themes and Findings ............................................................................. 44

7. Austroads Next Steps ......................................................................................... 45

References ............................................................................................................. 46

Appendix A National Heavy Vehicle Driver Competency Framework (2011) ............ 49
Table 5.4: Comparison of content of HR licensing unit (TLILIC2016 Licence to drive a heavy rigid vehicle) and known safety risk areas.................................28
Table 5.5: Whole of Fleet Segmentation by Vehicle Type and Customer Segment.................................31

Figures

Figure 2.1: Age profile of Truck Drivers in Comparison with All Occupations.................................5
Figure 2.2: Industry preference .................................................................................................7
Figure 5.1: Areas in training and licence assessment - survey responses ........................................30
Figure 5.2: New Driver Skills Development – survey responses .................................................34
1. Background

The Standing Committee on Transport approved the National Heavy Vehicle Driver Competency Framework (The Framework) in March 2011 (Appendix A). Key features of the Framework and the supporting National Heavy Vehicle Assessment Guide (Appendix B):

- establishes minimum competency standards for heavy vehicle drivers
- based around delivery via outsourced organisations who are Registered Training Organisations (RTOs)
- allows for assessment of the competencies via either:
  - progressive assessment (linked to training provision) and then a final competency assessment (FCA), including on road assessment
  - a competency test (CT) – available for rigid classes only.

In support of the Framework transport regulators worked with the Transport and Logistics Industry Skills Council to refine the industry training packages to align with the Framework. This work was reflected in the Licence to Drive training and assessment units.

1.1 Factors Contributing to Framework Review

Given the Framework was approved in 2011, a review was considered timely. A range of reports were considered as part of this work:

- coroners’ reports
- Senate Committee on Rural and Regional Affairs and Transport: Aspects of Road Safety hearing transcripts and reports
- various investigations by jurisdictions such as Victoria, NSW and WA into issue of heavy vehicle licences and/or competency assessments in exchange for money.

1.2 Scope

This review had two key elements, to review and evaluate:

1. the policy, operational and governance arrangements for heavy vehicle driver training and assessment in Australia
2. the content, competency and qualification requirements for heavy vehicle driver training and trainers under the Framework.

The scope of the project focused on adequacy, effectiveness and consistency of existing licensing arrangements and the operationalisation of the Framework in particular. It did not undertake a fundamental review of the intent and basis of licensing assessment.
1.3 **Methodology**

This assignment was approached with the intent of maximising, to the extent reasonable, stakeholder engagement and balancing this with desk top research and analysis.

The following key stakeholder groups were consulted:

- state and territory licensing regulators – data collection and interviews
- heavy vehicle operators – discussion with industry associations (eight), individual operators (12) and online survey (118)
- training providers – face to face and phone interviews (22) and online survey (110)
- other regulators and policy makers – interviews with:
  - Australian Skills Quality Authority (ASQA) (as representative of the training sector regulators)
  - Industry Manager - Transport & Logistics, Maritime, Rail, Water, Australian Industry Standards (owners of the *Licence to Drive* training units)
  - Workplace Health and Safety Qld (as representative of the state based workplace safety regulators)
  - National Heavy Vehicle Regulator (NHVR)
  - National Transport Commission (NTC)
  - Australian Road Research Board (ARRB).
2. A National Framework?

It is apparent that the Framework (Appendix A), despite its name, is not national. Not only has it not been implemented by all jurisdictions, where it is utilised there are a range of variations in how it is implemented.

The following summarises by jurisdiction the implementation of the Framework.

Table 2.1: Implementation of the framework by jurisdiction

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Implemented (in Full or in Part)</th>
<th>Actively Planning to Implement</th>
<th>In Principle Intent to Implement - not Current Priority</th>
<th>No Current Intent to Implement</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACT</td>
<td>☑</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NSW</td>
<td>☑</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NT</td>
<td>2018 introduction</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Qld</td>
<td></td>
<td></td>
<td>☑</td>
<td></td>
</tr>
<tr>
<td>SA</td>
<td>☑</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tas</td>
<td>☑</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vic</td>
<td>☑</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WA</td>
<td></td>
<td></td>
<td></td>
<td>☑</td>
</tr>
</tbody>
</table>

2.1 Variation in Existing Jurisdictional Arrangements

Despite substantive efforts to achieve harmonisation, much of which has been successful and is to be acknowledged, there remains considerable variation in jurisdictional practice with regard to heavy vehicle licensing. Key features of difference include:

- variations in standard or ‘normal’ licence progression arrangements
- differing approaches to exceptions to the standard progression approaches
- reliance, or not, on practical on road testing as the key mechanism for assessing competence
- requirement for training as a pre-requisite to undertaking an assessment of competence
- insourced versus outsourced assessment arrangements.

Variations are based on a number of factors which are:

- historical
- relate to government policy - particularly in relation to outsourcing
- response to remote and rural servicing issues
- response to specific market sectors - in particular the primary producer sector.

Realistically these factors cannot be ignored regardless of any argument about consistency, fairness or best practice. In considering how to move forward, jurisdictions need to continue to balance a complex social, economic and policy environment. However, in a country where heavy vehicle licences, driver assessor qualifications and certificates of attainment and/or competency are recognised across borders, a continued movement towards consistent best practice should remain the goal.
2.1.1 Heavy Vehicle Classes and Licence Progression

Heavy vehicle licence classes are nationally agreed and fall in to two main groups:

- **Rigids** – Light Rigid (LR); Medium Rigid (MR) and Heavy Rigid (HR)
- **Articulated/Combinations** – Heavy Combination (HC) and Multi Combination (MC).

The definition of these classes is largely standardised across jurisdictions, although there are some limited variations.

In general terms there is an expectation that licence holders progress from lower to higher vehicle classes with minimum periods of time served on lower classes before the applicant is eligible to progress to a higher licence class. There are nationally agreed progression arrangements, however, there are a relatively large number of jurisdictional variations which are granted either:

- ‘As of Right’ – i.e.: no special circumstances are required and provided the candidate adheres to the prerequisites they are able to progress more directly and/or rapidly through the licence classes.
- Based on exceptional circumstances eg: needed for employment; lack of access to rigid vehicle. These arrangements are usually dealt with on a ‘case by case’ basis although there are general guidelines. Licences may be conditioned or restricted.

The imposition of minimum time periods before progression is based on the assumption of paced skill development with the aim of maximising safety outcomes. While regulators are rightly concerned about safety, there is no evidence that safety outcomes are improved when people have had experience driving rigid vehicles before they progress to combination vehicles – a proposition which is yet to be researched or tested. Importantly licence tenure requirements are simply a requirement to hold a licence for a period of time and there is no guarantee of how much, if any, behind the wheels experience a person has had during the period.

**Indirect Views on Progression**

As part of the industry survey there was exploration of whether a more rapid progression through the licence classes should be allowed, and more particularly whether there should be a more readily available mechanism for going straight from a C class licence to a HC licence.

Interestingly while 65% of heavy vehicle operators said that they were not satisfied with current waiting period based licence progression arrangement, 53% did not favour the ability to progress from a C class licence direct to a HC licence.

Some of the comments from those who supported a more rapid progression included:

*Current ‘time served’ components of the graduated licensing system disregard the demonstration of competencies to move to higher licensing classes in a timely manner, thereby contributing to a shortage of quality heavy vehicle drivers, particularly at MC level.*

*Get learners in body trucks at 18. Training plans developed and followed. 19 years old into a HC and at 20 years into B Doubles. At 21 start with Type 1 and 2 combinations under a training plan.*

*The industry Is losing competent young drivers who have been driving on farms etc for years learning from their parents/friends and could safely operate combination vehicles at 18 years of age because they cannot be employed until they reach an age limit to legally qualify.*
However, there was resistance to the concept of direct progression to a combination licence with comments including:

*Progression should not be by leap frogging. Some relevant experience should be gained in a heavy vehicle (rigid class – preferably medium or heavy rigid) before training and assessment in the articulated classes but then HC first then MC after relevant experience and documented operational hours of driving.*

*There is a big difference in the weight i.e.: 15 tonnes to up to 68 tonnes which people have to get used to gradually.*

*Driving a car is nothing like driving a truck and it is foolish to suggest they are similar.*

*Absolutely not! Disaster waiting to happen.*

The trucking industry associations argue that the licence progression arrangements, which prevent a person from driving a combination vehicle until at least several years after they have left school, impacts attraction of young school leavers to the industry. The argument is made that there are limited professional truck driving roles requiring a rigid as opposed to combination vehicle, with rigid vehicles more commonly used by industries where transport is an ancillary element to the main business.

Figure 2.1 shows that compared to the rest of the workforce truck drivers are over represented in the age groups 35 – 65 and under represented in the age groups 15 – 35.

*Figure 2.1: Age profile of truck drivers in comparison with all occupations*

![Age Profile (per cent share) - Truck Drivers](image)

*Source: ABS labour force data 2012*

This points to people taking up a truck driving career later in life and is supported by insurer NTI’s analysis which found that of insurance losses involving drivers aged 46 – 60, 21.4% had less than 10 years experience (NTI NTARC, 2015). It is unclear whether younger people are simply not interested in becoming professional truck drivers, hence the later age at which people enter the industry, or whether lack of rapid access to combination licences is a barrier.

The Australian Trucking Association, and some of the heavy vehicle online survey respondents, support a traineeship or apprenticeship style program. This would see a school leaver provided with a progressive, experience based grounding in the industry, leading to a combination vehicle licence at around 20 years of age.

It is however interesting to note that despite considerable interest in traineeship style schemes, attempts by organisations such as the Victorian Transport Association to promote them have had little take up, except where supported by government subsidies. Apart from larger operators, who have insured programs, other operators seem unprepared to pay to develop staff; and individuals are unwilling to incur the cost of such a program themselves.
2.1.2 Requirements and Mechanism for Determining Competency

Licence applicants are generally required to demonstrate both knowledge and skill to be considered eligible to hold a licence. There are of course other pre-requisites such as jurisdictional residence, evidence of identification etc. However, the focus of this work was on knowledge and skill.

The following two tables describe the current requirements and paths for obtaining a heavy vehicle licence in each jurisdiction. Table 2.2 relates to licence classes LR to HC and Table 2.3 relates to MC. What is evident from these tables is that while there is in principle high level consistency in licensing requirements (i.e. knowledge and skill requirements) there is considerable jurisdictional variation in how this is applied in practice.

Table 2.2: Competency assessment options for LR to HC classes

<table>
<thead>
<tr>
<th></th>
<th>ACT</th>
<th>NSW</th>
<th>NT</th>
<th>Qld</th>
<th>SA</th>
<th>Tas</th>
<th>Vic</th>
<th>WA</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Theoretical tests</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Departmental knowledge test</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
</tr>
<tr>
<td><strong>Competency/practical assessment</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Heavy Vehicle Driver Competency Framework (HVDCF)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Training course</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
</tr>
<tr>
<td>Progressive/ final competency assessment</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
</tr>
<tr>
<td>Competency test</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
</tr>
<tr>
<td><strong>Non-HVDCF</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Approved training course and related assessment</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
</tr>
<tr>
<td>Practical test with departmental staff</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
</tr>
<tr>
<td>Practical test with approved provider</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
</tr>
</tbody>
</table>

Available (in the case of theoretical test – is required)
Available with restriction or condition (in the case of a theoretical test – is sometimes required)
Not available

Note: Where multiple options are shown for a jurisdiction, licence applicants can choose one of several alternate paths.

Table 2.3: Competency assessment options for MC licence class

<table>
<thead>
<tr>
<th></th>
<th>ACT</th>
<th>NSW</th>
<th>NT</th>
<th>Qld</th>
<th>SA</th>
<th>Tas</th>
<th>Vic</th>
<th>WA</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Theoretical tests</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Departmental knowledge test</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
</tr>
<tr>
<td>Service provider knowledge test</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
</tr>
<tr>
<td><strong>Competency/practical assessment</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Heavy Vehicle Driver Competency Framework</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Progressive/final competency assessment</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
</tr>
<tr>
<td><strong>Non-HVDCF</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Completion of supervised log book hours only (no test)</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
</tr>
<tr>
<td>Approved training course and related assessment</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
</tr>
<tr>
<td>Practical test with approved provider</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
<td>☣</td>
</tr>
</tbody>
</table>

Available (in the case of theoretical test – is required)
Available with restriction or condition (in the case of a theoretical test – is sometimes required)
Not available

Note: Where multiple options are shown for a jurisdiction, licence applicants can choose one of several alternate paths.
2.2 Value of Experience

The majority of jurisdictions have in place a requirement for logged hours as a central part of obtaining a C class licence. This practical experience based element is seen as a critical feature in achieving road safety outcomes and is evidence based.

However, with some limited exceptions, there is very little emphasis placed on practical experience as part of heavy vehicle licensing.

When industry was asked whether they would prefer to employ a driver who had practical on road experience or a person who had undergone a training and assessment program the majority of respondents said they would prefer practical experience, as illustrated in Figure 2.2.

Figure 2.2: Industry preference

Industry comments included:

Drivers do not get EXPERIENCE on the job before getting their licence …Years ago drivers learned ‘on the job’ with an experienced driver besides them for MONTHS before they went out on their own.

I think it is important that they have both practical and formal training/competency – only both combined will achieve a harmonised approach to licensing and on road behaviour.

Practical supervised experience from industry. Forget the competency based assessment.

You cannot put a time limit on experience and you cannot train for all situations.

I believe at least 10 hours behind the wheel training before assessment for a MR class and at least 30 hours behind the wheel training for HR and HC class.

Some of industry preference for practical experience is based on their lack of confidence in the current training and assessment process. If this process were more robust results may change. However, it is clear that the heavy vehicle industry sees the value of practical experience. Some said that rather than focusing on minimum training days or requirements there should be:

- minimum supervised driving hours with suggestions ranging from 50 hours to 160 hours
- minimum period of active driving which ranged from one month to 12 months
- industry specific training and at least six months on road supervised driving.

The Heavy Vehicle Industry Safety and Training Alliance in WA propose that 500 hours of logged driving experience is required for a person to be considered a competent professional driver.
2.3 A Path to Greater Consistency

There are two key elements that create variation in jurisdictional approaches to determining competency:

- practical test only or progressive assessment and FCA
- outsourcing versus insourcing of competency assessment.

2.3.1 Practical Test Only or Progressive and Final Assessment

The Framework allows for two paths to demonstrate competency:

- CT (Rigids only)
- progressive assessment and FCA.

This report supports the overall preference for licence applicants to take a training based approach, provided the quality of the training and assessment is of a minimum acceptable standard. However, there is no evidence to substantiate, or otherwise, improved safety outcomes where a training and progressive assessment based approach is taken. Further a practical test only option may well be suited to people who have had the opportunity to develop skills over a period of time, eg: under supervised driving in a variety of situations. On this basis the CT should be a genuine mechanism for assessment of competency in the same way as progressive assessment and FCA is intended to be. It should not be unduly harsh in what is required or how it is applied, nor should it be an easy option.

The key principle should be consistency of competencies and the minimum acceptable standard to be considered competent, regardless of the assessment method.

2.3.2 Outsourcing versus Insourcing of Licence Assessment

As previously outlined, jurisdictions have made decisions about their service model for a variety of reasons and the rationale for the service approach is beyond the scope of this project. However, the decision to base the Framework on an outsourced service delivery model has created an unnecessary artificial barrier to achieving national consistency and minimum standards. Competencies which are required to be met should be the same regardless of the service delivery approach.

Where there is an insourced service approach the assessment of skill, as opposed to knowledge, is determined by an on road practical test. It is of note that no jurisdiction, including where the Framework is utilised, has chosen to adopt the Framework CT for use by departmental staff.

Where jurisdictions continue to offer insourced heavy vehicle assessment, it is accepted that an on road test, and not an integrated training and assessment based approach will be adopted. This practical test should be based on the same competencies as the Framework and align with the Framework CT.

Ultimately, the focus should be on ensuring that the required competencies fully describe the skills and knowledge of a competent driver, have been adequately assessed and that minimum standards have been met. In working towards a national approach it is considered fundamental that the approach cater for both insourced and outsourced delivery and that assessment approaches are consistently applied regardless of service approach.
2.4 Key Themes and Findings

- A national approach must recognise a combination of insourced and outsourced delivery. The Framework, which is currently premised on an outsourced only model, should be revised by Austroads to enable a variety of service approaches with standardised competencies and assessment.

- Practical experience, which enables paced skill development, is highly valued by industry. Regulators have placed value on practical experience in requirements for young drivers wishing to obtain a car licence, however there is little emphasis on this for heavy vehicle licensing. Greater focus on practical experience in heavy vehicle licensing is an area where increased focus and support by regulators would be appropriate.

- Current licence tenure requirements, while intended to promote progressive skills development, place an arbitrary barrier which does not guarantee skill development or safety outcomes. Genuine competency development requires time and experience. Approaches which support applicants to develop a deep level of skill are preferred. However, investing in training and supervised experience is expensive, and ultimately this cost must be borne by someone. While there are exceptions, particularly in the case of larger operators or where government has provided subsidies, the heavy vehicle industry and individuals themselves have been reluctant to make this investment.
3. **Dual Regulation – VET and Licensing**

This chapter provides a brief overview of the Vocational and Educational Training (VET) sector as background to understanding the relationship with training and assessment of:

- heavy vehicle licence applicants
- heavy vehicle trainers and assessors.

It then analyses the regulatory oversight of training organisations by the VET sector and by transport regulators and considers the relative roles and focus of each. Finally, there is a discussion on the impacts of utilising industry approved training courses as the basis for licensing.

### 3.1 Training Related Entities

There are four key groups involved in the training sector:

1. Australian Industry Skills Council (AISC)
2. VET regulators
3. Industry training package developers
4. Registered Training Organisations (RTOs).

#### 3.1.1 AISC

The AISC is the key policy maker. It advises Commonwealth and State Industry and Skills Ministers on the implementation of national vocational education and training policies, and approves nationally recognised training packages for implementation in the VET system (www.aisc.net.au).

#### 3.1.2 VET Regulators

The VET sector is regulated by a combination of a national regulator and state based regulators in Victoria and Western Australia.

The Australian Skills Quality Authority (ASQA) is the national regulator for Australia’s VET sector. ASQA regulates courses and training providers to ensure nationally approved quality standards are met (www.asqa.gov.au/about). It regulates training in six states and territories (QLD, NSW, ACT, Tas, SA and NT). It also has regulatory oversight of training offered by Vic and WA RTOs where courses are offered across state and territory boundaries or for international students.

The Victorian Registration and Qualifications Authority and the Western Australian Training Accreditation Council are the regulators in these states, for those RTOs not under ASQA regulation.

VET regulators, national or state, register training organisations and monitor their performance against the RTO Standards (Standards for Registered Training Organisations, 2015). They do not develop or approve training.
3.1.3 Industry Training Package Developers

Industry Reference Committees ( IRCs ) are the formal channel for considering industry skills requirements in the development and review of training packages. IRCs advise the AISC about the skills needs of their industry sector and promote the use of VET for their sector. Each IRC is supported by a Skills Service Organisation who provide secretariat and other support services and act as the main point of contact for people wishing to provide input to training package development.

The Transport and Logistics IRC is responsible for the national training package qualifications relevant to warehousing, logistics, driving and other related operations. Australian Industry Standards are the appointed Skills Services Organisation who provide support to the Transport and Logistics IRC.

3.1.4 Registered Training Organisations

RTOs are training providers registered by ASQA or state based VET regulators. Only RTOs can:

- deliver nationally recognised courses and accredited Australian Qualifications Framework VET qualifications
- apply for Australian, state and territory funding to deliver vocational education and training.

RTOs can offer qualifications at the following levels:

- Certificates I, II, III and IV
- Diploma
- Advanced Diploma
- Vocational Graduate Certificate
- Vocational Graduate Diploma.

There are over 4,000 RTOs in Australia. About 200-250 are registered to deliver some aspect of heavy vehicle driver training, ranging from full certificate courses (such as the TLI31216 Certificate III in Driving Operations) to individual units of competency (such as TLILIC2016 Licence to Drive a Heavy Rigid Vehicle).

3.2 Competency Based Training

The VET sector works under principles of competency based training.

Competency based training is:

‘an approach to vocational education and training that places emphasis on what a person can do in the workplace as a result of completing a program of training. Competency based training programs are comprised of competency standards set by industry that each student is assessed against to ensure all the outcomes required have been achieved. Progression through a competency based training program is determined by the student demonstrating that they have met the competency standards through the training program and related work, not by time spent in training. This way, students may be able to complete a program of learning much faster’ (Victoria State Government, 2018).

The principle of training being based, not on time spent in a training course, but on development and assessment of competency is an important concept. Nationally recognised qualifications in the VET sector all have a Volume of Learning range (minimum – maximum) which is intended to provide guidance on the time that a qualification will take to obtain. However, these learning ranges are not mandatory.

A key issue discussed in this report is the length of training programs offered by outsourced providers, which in a number of cases is below the minimum recommended learning range.
3.2.1 Understanding Competency

Within the Australian VET system, workplace competency is defined as the ability to apply relevant skills and knowledge consistently over time and in the required workplace situations and environments (Australian Skills Quality Authority, 2015). Competency covers all aspects of workplace performance and involves:

- performing individual tasks
- managing a range of different tasks
- responding to contingencies or breakdowns
- dealing with the responsibilities of the workplace, including working with others.

Units of competency are the building blocks from which VET qualifications are assembled. The success of any training program depends to a great degree on these units accurately, and fully, describe the skills, knowledge and attitudes required for occupational proficiency.

The following describes the components of a unit of competency and where appropriate provides examples of the relevant components to TLILIC2016 Licence to drive a heavy rigid vehicle:

- **Elements of competency** - elements describe the essential outcomes of a unit of competency, resulting from the application to a defined occupational activity of knowledge, skills and attitudes; e.g. drive a heavy rigid vehicle. They equate roughly to an occupational duty or main activity.

- **Performance criteria** - these expand on the activities within an element, and are stated as observable behaviours; for example, *Braking system of heavy rigid vehicle is managed and operated efficiently to ensure effective control of vehicle under all conditions*. They equate roughly to an occupational task.

- **Range of conditions** - these describe essential operating conditions and any other variables that apply to the work environment. For the unit TLILIC2016 Licence to drive a heavy rigid vehicle, no essential conditions are described in the unit of competency.

- **Performance evidence** - this describes the activities that the learner/assessment candidate must be observed to perform, as evidence that he/she can carry out work activities to the standards normally required in employment; for example, … *anticipating and monitoring traffic hazards and taking appropriate action*.

- **Knowledge evidence** - this describes the knowledge that the learner/assessment candidate must be observed to demonstrate, as evidence that he/she can carry out work activities to the standards normally required in employment for example, *knowing how an auxiliary braking system operates*.

- **Assessment conditions** - this specifies the conditions under which the assessment must take place; for example, *At a minimum, assessment must satisfy applicable regulatory requirements, which include requirements in the Standards for Registered Training Organisations current at the time of assessment*.

3.3 The Framework and Training Providers

Licensing regulators are responsible for the integrity of end to end driver licensing arrangements. In establishing processes to ensure that regulatory outcomes are achieved, service elements can be delivered via insourced or outsourced arrangements. It is important to realise however that the risk of maintaining driver licensing integrity always remains with the regulator and cannot be ‘contracted out’.

This concept of risk remaining with the regulator regardless of service arrangements, may seem self evident. However, in establishing the Framework there appears to have been a greater level of confidence placed in VET sector to manage licensing regulatory risk than was justified. There is a clear logic in utilising RTOs who are:

- regulated by either ASQA or state based entities, and therefore approved as meeting relevant standards and subject to ongoing regulatory oversight
• skilled in the delivery of training and associated assessment
• delivering standardised agreed driving licensing related training and assessment which has been approved by the licensing regulator.

However, with the benefit of hindsight it is evident that greater levels of licensing regulator control are required than was originally envisaged. The questions for transport regulators are:

• whether the VET provisions are sufficient for their purpose
• if provisions are only partly sufficient, what additional controls are required to be put in place by licensing regulators
• if licensing regulators put in place their own controls, are VET regulatory controls required.

These three questions are the focus of the remainder of this chapter.

3.4 Is VET Regulation Sufficient?

There are two forms of regulation of the VET sector:

• state based in the case of Vic and WA except where covered by ASQA
• national which is undertaken by ASQA and which applies in all other jurisdictions and in Vic and WA where the RTO provides services across jurisdictional borders or services international students.

ASQA, as the primary regulator, was consulted as part of this work. While the state based regulators were not consulted it is considered that the principles and core issues of relevance to this work are equivalent.

Australian RTOs operate across a wide variety of sectors offering courses ranging from Certificate I through to Advanced Diploma. ASQA is not an expert in any of these sectors or courses, but relies upon the requirements set out in the training product itself (i.e. the training package or the accredited course). They have in place generic compliance tools and monitoring controls which seek to provide a level of assurance around the operation of the RTOs it regulates.

ASQA audits prior to registration as an RTO, following up with a compliance audit within two years of registration. Compliance audits can be undertaken at any other time and may be triggered by complaints or other intelligence. In 2017 they moved to a student-centred audit approach which is structured around practices and behaviours in relation to five key phases of the student experience:

• marketing and recruitment
• enrolment
• support and progression
• training and assessment
• completion.

The depth and scope of the audit is based on compliance history and risk intelligence.

Typically, ASQA will focus their audit work on some component of the student experience rather than the full end to end process. While student, trainer and assessor interviews may be undertaken, ASQA will primarily focus on a review of records and seek evidence through this mechanism that course requirements have been complied with. They do not sit in on training courses nor do they ‘mystery shop’. Further, ASQA auditors are unlikely to have any subject matter expertise in the training provided by the RTOs they review.
ASQA is wholly reliant on the approved training course specifying what is required to be delivered. They do not look beyond what is documented to ‘intent’ nor do they assess whether an approved training course is ‘fit for purpose’. ASQA assesses whether an RTO’s training and assessment strategies are consistent with the requirements of the training product. They do not specifically check for compliance with other regulation, including transport regulation, although they will endeavour to make relevant regulators aware of any evident breaches so they may address them.

ASQA, like all regulators, targets their efforts on those areas where they believe there is greatest risk. Providers of heavy vehicle licence training are not currently identified as high risk. However, as a result of the Senate Committee on Rural and Regional Affairs and Transport: Aspects of road safety, Interim Report, ASQA are monitoring this sector through data such as applications for RTO status, complaints and media monitoring.

While ASQA provides a level of assurance and oversight they are not aware of, nor focused on, licensing risks and issues. It is therefore concluded that licensing regulators cannot rely on VET regulation to assure themselves of the adequacy and quality of licence training and assessment. They need to take an active role in setting standards and in proactive management of what is a significant regulatory function.

### 3.5 Additional Licensing Regulator Controls

The jurisdictions who have adopted the Framework have progressively tightened controls over outsourced providers either in response to problems or based on learnings of others. These controls are aimed at:

- providing increased assurance around quality of outsourced service provision
- reducing the likelihood of fraud or increasing the probability of it being detected.

The following list identifies key controls currently in place, noting that these have not been implemented in all jurisdictions:

- Mandating pre-booking of in vehicle/road based assessment via departmental systems providing an option for a departmental auditor to ‘sit in’. Failure to carry out this pre-booking will result in refusal to accept a competency assessment certificate and therefore licence issue.
- Mandating a camera for all in vehicle/road based assessment enabling footage to be reviewed for process adherence and/or quality.
- Separation of trainer and assessor functions.
- Monitoring of provider assessment data including pass and fail rates and linking with other intelligence to develop risk profiles.
- Departmental auditing.
- Requirement that approved heavy vehicle assessors undertake the following as part of initial approval and periodic refresher/repeat assessment (eg: biennially):
  - specific heavy vehicle assessor training (typically five days)
  - knowledge tests based on the heavy vehicle guidelines and/or assessment manual
  - in vehicle/road based test.

These controls, provided they are fully implemented, give a significantly higher level of control over licensing assessment product quality and fraud prevention than is available from VET regulatory oversight.

It should however be noted that the mix of the above controls is not exhaustive or necessarily best practice, and it is recommended that they be regularly reviewed and if required amended or replaced with more effective (and preferably national) measures designed to enhance quality and probity of delivered services.
3.6 Is VET Regulation Required

Given that licensing regulators are responsible for risk management of licensing functions, the relative value of requiring heavy vehicle trainers and assessors to be RTOs and therefore overseen by the VET regulatory sector must be questioned. The Independent Commission Against Corruption report into false certifications of heavy vehicle competency based assessments in NSW (ICAC, 2014) specifically queries this dual regulation stating that:

*The layers and complexity of accountability and control in the current model indicate that this approach to assurance and oversight may be of limited benefit* (ICAC, 2014, pg 19).

Licensing regulators tend to focus on the assessment rather than the training side of the RTO/outsourced provider operation. In a desire to strengthen the safety and competency requirements of the Licence to Drive units, there have been jurisdictional specific modifications made to the National Heavy Vehicle Assessment Guide to address perceived shortfalls and in one case a move away from the requirement for training as a precursor to the FCA. This approach, while motivated by a desire to strengthen assessment, is effectively resulting in dual regulation, VET and licensing. This creates tension for outsourced providers and is increasingly moving away from the principal underpinnings of the Framework.

ASQA in their 2017 report into short courses, provided case studies on overlapping regulation in areas such as the security industry and apprenticeships. Similar to what is occurring in heavy vehicle licence competency assessment, other state based regulators have imposed specific requirements in relation to course content and duration. The ASQA report found that:

*This complexity has a substantial impact on a sector which is already notoriously complex:*

- It creates inefficient and overlapping regulation (for example between ASQA and occupational licensing regulators) which ultimately drives up costs for governments, business and consumers
- It generates significant regulatory burden for providers who are subject to multiple regulatory frameworks and reporting requirements
- It triggers significant variations in the durations of courses that providers in different jurisdictions offer for the same qualification, without any apparent rationale. These variations are confusing for industry, employers and students. This inconsistency also serves to undermine confidence in VET by calling into question whether these nationally portable qualifications are equivalent (ASQA, 2017, pg 55).

The increasing move by some jurisdictions to departmentally managed and mandated competency assessment raises two key issues:

1. Why mandate training at all and move simply to mandate assessment requirements?
2. Why not incorporate the regulator’s assessment requirements into the approved Licence to Drive units?

3.6.1 Training

The key purpose of licensing drivers is road safety. Only those drivers who meet the regulator’s minimum standards are issued a licence. However, it is the interests of road safety and regulators to promote an even higher standard of driver skill and capability above the minimum.

Over the past two decades regulators have placed considerable emphasis and resource into graduated licensing systems for young drivers. Efforts have included videos, online tools and support material. These resources have been supplementary to them passing an assessment to obtain their licence. As a cohort who are over represented in road incidents, it is appropriate that regulators have put in place these additional supports and requirements with the aim of improving road safety. It would appear equally relevant to consider this same level of support and requirements for heavy vehicle drivers.
Heavy vehicles, like young drivers are overrepresented in road statistics. Building skill and capability in the people who drive heavy vehicles is therefore of clear benefit to all road users. A number of jurisdictions have already recognised this and have invested in material such as online resources and video material which, like much of the material provided to young drivers, is supplementary to the meeting of minimum assessment criteria. Quality training offered as part of the lead up to attainment of a heavy vehicle licence serves the same purpose of promoting driver capability and hence road safety.

There is no evidence to support the benefits of training as an adjunct to the assessment of drivers against minimum criteria – however there is also no evidence to say that it does not in fact improve capability and safety. Like much in the road safety area, a longitudinal study involving a sizeable sample would be required to provide evidence one way or the other. However, it is a reasonable hypothesis that increasing knowledge and exposure to the skills and capabilities required to safely drive a vehicle is likely to increase competence. While evidence based regulation is always preferable, heavy vehicle regulation in many areas is based on a combination of research and considered policy positions which draw on intelligent debate rather than hard evidence.

The benefits of training were implicit in the Framework and completion of the relevant Licence to Drive units were the foundation on which licence assessment was centred. A focus by licensing regulators on ensuring the quality of the assessment process does not mean training should be dismissed as part of the overall framework of building driver competence. In fact, a key criticism of the current environment is that there is too much focus on ‘training to the test’ rather than building overall competency. Ultimately an FCA or CT is a single event and building competency takes time (discussed further in Section 6) and inherently requires a range of skills and knowledge that is wider than can be assessed in a single assessment.

3.7 Utilisation of Approved Industry Training

Where jurisdictions have a training requirement as a precursor to assessment and licence issue, in the majority of cases, this training is an approved industry course delivered via the VET sector. As outlined previously the Transport and Logistics IRC and supporting Skills Service Organisation (Australian Industry Standards) are responsible for developing the units of competency that underpin heavy vehicle driver training including:

- Drive a Heavy Vehicle
- Licence to Drive a Heavy Vehicle.

In development of the Framework, the Heavy Vehicle Driver Competency Framework Working Group worked with the Transport and Logistics ISC to incorporate their requirements in to the newly developed Licence to Drive training units. There has been limited work with the ISC or the supporting Skills Service Organisation. Australian Industry Standards, since the establishment of the Licence to Drive units.

Some jurisdictions are questioning the value of retaining the relationship with the ISC. This is based on a desire to have greater ownership and control of the training, and by implication assessment, applied under the Licence to Drive units. As the sole purpose for these units is licensing it is reasonable to argue that the units should be totally aligned to the needs of licensing regulators.

The importance of ensuring that underpinning training and assessment of Licence to Drive units remains fit for purpose, is paramount. This requires licensing regulators to work proactively with the Training and Logistics ISC and Australian Industry Standards to ensure the Licence to Drive units are updated to meet identified requirements. Should this aim not be able to be achieved, licensing regulators would need to consider alternative approaches for ensuring that training and assessment meets their regulatory requirements.
3.8 Key Themes and Findings

- In driving road safety outcomes licensing regulators have an underlying responsibility to support the development of overall heavy vehicle driver competence which is broader than whether a person can pass a CT or FCA. Quality training, accompanied by support materials such as videos, handbooks etc is one component of an integrated competency development approach.

- ASQA provides oversight of a range of governance and organisational capability factors, however licensing regulators retain the risk for licensing assessment and therefore must set and monitor the minimum required standards for licence issue.

- Outsourced provision requires licensing regulators to work with the Transport and Logistics IRC to align their assessment criteria and processes.

- Promoting best practice and safety outcomes would be supported by:
  - active and ongoing engagement between Austroads and Australian Industry Standards to maintain and upgrade the Licence to Drive units
  - active jurisdictional licensing regulator engagement with the local ASQA (and where relevant state based VET regulator’s) representatives.
4. Governance of Outsourced Service Provision

The provision of assessment services which underpin the issue of a heavy vehicle driver licence through outsourced providers requires a system of corporate governance to:

- provide assurance around *quality* of outsourced service provision
- reduce the likelihood of *fraud* or increase the probability of it being detected.

The following definition of corporate governance by Justice Owen in his review of the HIH collapse provides useful guidance in considering the elements which must be considered:

> “the framework of rules, relationships, systems and processes within and by which authority is exercised ...... It encompasses the mechanisms by which .... those in control, are held to account” (HIH Royal Commission, 2003, page xxxiv).

The following provides a proposed interpretation of these essential elements for licence competency and related assessment. The rationale for each of these elements is described in the rest of this section.

**Rules**

1. Licensing regulator defines competencies and assessment standards.
2. Licensing regulator sets minimum requirements to be an Approved Provider of licensing assessment services.
3. Licensing regulator sets minimum requirements to be an Approved Assessor including skills and knowledge maintenance.

**Relationships, Systems and Processes**

4. Licensing regulator appoints Approved Assessors and requires them to undertake assessments in accordance with the departmental standards.
5. Licensing regulator and Approved Provider enter in to a legal deed of agreement and the Approved Provider operates in accordance with its requirements.

**Controls**

6. Licensing regulator monitors Approved Provider performance against the deed including periodic returns and evidences (eg: insurance; financial viability) and provides feedback on areas of non-compliance.
7. Licensing regulator monitors Approved Assessor performance against compliance with assessment standards and continued compliance with legislative requirements and provides feedback on areas of non-compliance.
8. Licensing regulator works with the Approved Provider and Assessors to seek improvement in areas of non-compliance and exercises sanctions and penalties as required.
9. Licensing regulators periodically reviews the competencies and assessment standards and works with AISC for inclusion of changes in *Licence to Drive* units.
10. Licensing regulator periodically reviews the minimum requirements for Approved Providers, Approved Assessors and related agreements etc and makes adjustments.

VET regulatory controls were discussed in Section 3. These regulatory controls should be considered as operating in parallel to those outlined in this chapter. An overview of these 10 governance elements is the focus of the remainder of this chapter.
4.1 Rules

The rules of licensing and the processes by which they are delivered are the responsibility of licensing regulators.

4.1.1 Defining Competencies and Assessment Standards

The Framework and the National Heavy Vehicle Assessment Guide define the competencies and the standards around assessing these competencies. These are discussed in Section 5.

4.1.2 Minimum Requirements to be an Approved Provider

There is a clear distinction between an Approved Provider and an Approved Assessor and they should be separately considered by the regulator. To be an Approved Provider the entity must demonstrate their business capability. To be an Approved Assessor a person must demonstrate their individual capability.

In assessing an application to be an Approved Provider licensing regulators are determining capability. Capability is the sum of all things that enable an organisation to deliver services. Table 4.1 details the capability elements developed by the Department of Finance and Administration to be used when assessing an organisation’s ability to deliver services on behalf of government.

Table 4.1: Capability elements for outsourced providers

<table>
<thead>
<tr>
<th>Capability Element</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>People</td>
<td>The people and their collective skills, experience, tacit knowledge, culture, attitudes, relationships and needs and expectations to deliver the service.</td>
</tr>
<tr>
<td>Business practices</td>
<td>Documented processes that underpin service delivery.</td>
</tr>
<tr>
<td>Facilities and equipment</td>
<td>Physical facilities and non-ICT equipment required to enable service delivery.</td>
</tr>
<tr>
<td>Information and communication technology (ICT)</td>
<td>Systems for the communication, capture, classification, storage, management, retrieval and dissemination of knowledge.</td>
</tr>
<tr>
<td>Knowledge</td>
<td>Domain specific knowledge applied in service delivery.</td>
</tr>
<tr>
<td>Accountability and governance</td>
<td>Framework to determine accountability for governance of all aspects of delivery.</td>
</tr>
</tbody>
</table>

Source: Department of Finance and Administration, 2006 (pg 7).

Explicitly, it should be a relatively high bar to be endorsed as an Approved Provider. Licensing is a significant regulatory function with community safety outcomes at the core – approval to provide these services on behalf of government should not be lightly given.

4.1.3 Minimum Requirements to be an Approved Assessor

As outlined, it is recommended that Approved Assessors be individually assessed and endorsed by licensing regulators. This occurs currently in most jurisdictions.

Jurisdictions assess a range of factors including:

- personal characteristics eg: licence class held; heavy vehicle experience, traffic offence history
- qualification evidence eg: Certificate IV in Heavy Vehicle Driver Instruction; Certificate IV in Training and Assessment; pass a road rule test.

Some jurisdictions also require assessors to maintain their capability over time eg: periodic practical competency and road rules test.
4.2 Relationships, Systems and Processes

In considering the processes that are involved in outsourced licensing assessment, it is appropriate to consider the nature of the relationship between regulators and Approved Provider and Assessors. The Queensland Office of the Information Commissioner outlined two forms of outsourcing of government services – Transactional and Relational.

Transactional (or classical or spot) contracts are typical of a one-off market transaction in which all elements of the agreement, including the goods and services to be purchased and the price of purchase, are clearly specified in the contract and neither party can be obliged to act in ways not explicitly mentioned in the contract.

Relational contracts, by contrast, are typical of ongoing relationships such as service contracts, in which the terms of agreement between principal and agent are more open-ended, allowing the parties more scope to exercise discretion and providing for adjustments to be made as the contract progresses (Mulgan, 2015, pg 9).

The arrangements between regulators and Approved Providers and Assessors are clearly relational rather than transactional. A number of regulators talked about working together to support providers to deliver licensing related services to the community, particularly in remote areas where there are limited alternate options. Further, some regulators talked about building shared values around road safety. This concept was discussed by the Office of the Information Commission:

‘Particularly in ongoing relational contracts or partnerships, those involved need to be in regular communication in order to respond effectively to changing circumstances and to develop commitment to shared values’ (Forrer et al., 2010, pg. 481).

Without taking away from the importance of standards and ensuring that these are maintained, regulators should not consider Approved Providers and Assessors as ‘arm’s length’ entities that are governed solely by contracts and legislation. An engaged relationship which is based on mutual understanding of quality skills and knowledge services in support of road safety outcomes is most likely, in the majority of cases, to deliver positive outcomes.

4.2.1 Approved Assessors

In making a determination that a person has met the minimum competency standards the Approved Assessor is effectively giving a ‘green light’ to licence issue. It is acknowledged that regulators have other eligibility requirements, however from a knowledge and skill perspective, this is the key sign off. Further, as part of moving to an increasing digital and automated assessment of eligibility, with reduced reliance on physical licence products which specify conditions etc, the importance of the role that Approved Assessors play is magnified.

As with Approved Providers, the regulatory bar should be unashamedly set relatively high. Regulators need to ensure that Approved Assessors are advised in writing of what is required making clear obligations, protections and penalties. Good practice would suggest that this should be explained through a departmental training package which could be delivered by either the department or the Approved Provider.

4.2.2 Approved Providers

The relationship between licensing regulators and current service providers is governed by some form of agreement. In addition to requiring service providers to maintain their compliance with the minimum requirements for eligibility, they also require a range of processes to be in place to provide some level of assurance around quality and service delivery.
Key features currently employed by regulators include:

- periodic self assessment of compliance with deed of agreement
- data submission to the regulator
- in vehicle cameras and monitoring of footage
- separation of trainers and assessors.

These obligations on service providers have two key purposes, to:

1. require service providers to put in place practices to promote quality and consistency of their training and assessment service (discussed in the remainder of this section)
2. provide information which is utilised by the regulator for monitoring and control purposes (discussed in the next section).

### 4.3 Regulator Controls

In addition to the controls that the regulator puts on the Approved Provider in the service deed, there remains a requirement for independent oversight and monitoring. As discussed previously, overall risk always remains with the regulator and therefore they need to proactively assess this and take appropriate remedial action.

#### 4.3.1 Monitoring of Approved Providers

The level and nature of monitoring undertaken by jurisdictions varies. The majority of jurisdictions indicated that they are risk based in their approach to monitoring, utilising data and other intelligence to develop risk assessments and target scheduled audits. In addition to this risk based approach, there remains a place for scheduled auditing of all providers.

RTOs interviewed were keen to see more, and more visible, auditor presence, to send signals to unscrupulous operators.

### Number of Approved Providers

Table 4.2 outlines the number of service providers in each jurisdiction.

<table>
<thead>
<tr>
<th>Number of Service Providers</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACT</td>
</tr>
<tr>
<td>-----</td>
</tr>
</tbody>
</table>

The number of providers in each jurisdiction is influenced by physical size of the jurisdiction, extent of outsourcing (i.e. which licence classes are outsourced) and availability of suitable providers particularly in remote locations.

Previous discussion in Section 4.1.2 recommended that the bar to become an Approved Provider should be set high given the importance of the regulatory function that is being managed. A large cohort of Approved Providers is difficult to adequately oversight and a smaller group of quality providers are more readily supported and monitored.

---

¹ SA has six providers who undertake their Training in Lieu of Experience (TILE) program. Licence assessment is undertaken by 61 individually appointed assessors who are not required to be attached to a service provider.
There can be a tension between providing services in rural and remote areas and ensuring a quality service. While it is important to consider the service needs of those in less populous areas it should not be at the expense of ensuring that standards are met. Obtaining a heavy vehicle licence is not a regular occurrence and therefore some inconvenience to achieve a safer road system would seem justified.

4.3.2 Monitoring of Approved Assessors

Most jurisdictions have in place quality monitoring for outsourced assessors including:

- monitoring of in vehicle camera footage where this is utilised
- sitting in on tests – requires a third seat which is mandated in some jurisdictions
- data analysis of individual assessor results identifying trend and outlier based factors which indicate risk.

Engagement which focuses on skill maintenance and development and knowledge, including of changes in legislation and policy, should also be a key part of regulator involvement, either directly or through the Approved Provider.

4.4 Management of the Framework

The copyright of the Framework and supporting material is with all states and territories. While Qld was the sponsoring jurisdiction for the Framework when it was initially developed, there is no identified custodian ongoing. Since the demise of the Heavy Vehicle Driver Competency Framework Working Group there has been no formal mechanism for jurisdictions to discuss and share ideas on the Framework itself and its implementation in practice.

Active continuing management of the Framework is an important governance control.

4.5 Key Themes and Findings

- Management of the licensing function requires regulators to have in place a range of processes, systems and controls to ensure the integrity of licensing assessment and issue. This is important whether there is an insourced or outsourced service delivery model. However, given the inherent risks in outsourcing, rigorous management is essential.
- Regulators must maintain standards and take action to address non-conformances. However, the building of an ongoing relationship with Approved Providers and Approved Assessors which is based on clear expectations; sharing of information; and support and engagement to assist in delivery of quality services, would promote regulatory outcomes.
- While acknowledging the importance of service accessibility, particularly in rural and remote areas, the number of Approved Providers and Approved Assessors should be managed to promote quality, rather than quantity, and ‘match’ available licensing regulator oversight and control resources.
- Development of a governance arrangement for ownership and management of the Framework on an ongoing basis is a key regulatory control.
5. Heavy Vehicle Driver Competency

To obtain a heavy vehicle licence a person must meet a set of eligibility criteria (e.g. medical fitness, residency etc) as well as an assessment of their knowledge and competency to drive. Section 4 provided an overview of the processes currently utilised by jurisdictions to determine competency.

This section examines:

- safety and competency
- core driver competency elements
- relationship between driving competency and job readiness.

5.1 Safety and Competency

The analysis of factors which contribute to road safety and vehicle crashes is complex. Much work has been done and continues. However, a useful framework for considering the multitude of factors which contribute to heavy vehicle crash risk is provided by Kipling (2011):

- enduring driver factors (e.g. knowledge / skill / medical)
- temporary driver factors (e.g. time–on–task / sleep / moods / drugs / local familiarity)
- vehicle (safety technologies / mechanics)
- roadway and environmental (design / intersection / traffic / weather)
- management (safety-focused practices / pay rates / training opportunities)
- government (licensing / regulation / enforcement).

Driver skill and knowledge are only one element of these six identified factors, although training opportunities are also considered to play a part.

Speed and fatigue are the two prime causal factors identified by NTI as contributing to heavy vehicle insurance claims. Neither of these factors is related directly to the ‘task’ dimension of driver competence however, they are strongly related to ‘attitudinal’ dimensions of competence, which are largely untested in current licence assessment processes. Regardless, it is self evident that drivers should be competent and that licensing regimes should seek to ensure that only competent drivers are licensed.

5.2 Core Driver Competency Elements

This section of the report:

- outlines competency as defined under the Framework
- provides an overview of differences between the Drive a Heavy Vehicle and Licence to Drive a Heavy Vehicle approved training units
- analyses and discusses additional elements that should be considered for inclusion under the Framework based on stakeholder input and a review of literature and reports.
5.2.1 Competency Under the Framework

The Framework (Appendix A) defines a person as competent ‘when they are able to apply their knowledge and skills to successfully complete an activity, in a range of situations and environments, to a defined standard of performance’. It goes on to outline that competency encompasses several dimensions which may include, but are not limited to:

- undertaking specific tasks or sub-tasks (such as uncoupling a trailer, reversing a vehicle or changing gears)
- managing a number of different tasks or sub-tasks concurrently or sequentially to complete a broader task such as driving from A to B (for example: restraining a load, perceiving and avoiding hazards, following approved routes and observing road rules)
- responding to problems and irregularities while undertaking a task
- non-task specific skills such as behaving temperately and interacting courteously with other road users.

The Framework outlines 15 criteria for assessing heavy vehicle competency which are listed in Table 5.1.

Table 5.1: Framework criteria for assessing competency

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Pre-Drive</th>
<th>Low Risk Driving Behaviours</th>
<th>Additional Risk Management</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Pre-operational check</td>
<td>• Create and maintain crash avoidance space</td>
<td>• Reverse</td>
</tr>
<tr>
<td></td>
<td>• Cabin drill</td>
<td>• Protect crash avoidance space</td>
<td>• Hill stop/start</td>
</tr>
<tr>
<td>Vehicle Operation and Control</td>
<td>• Start off, move off, shut down and secure</td>
<td></td>
<td>• Load securing</td>
</tr>
<tr>
<td></td>
<td>• Manages steering</td>
<td></td>
<td>• Coupling/uncoupling</td>
</tr>
<tr>
<td></td>
<td>• Manages gears</td>
<td></td>
<td>• Bus stop procedure</td>
</tr>
<tr>
<td></td>
<td>• Manages brakes</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Manages accelerator</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Compliance</td>
<td>• Road rules and directions</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Competence is assessed through either:

- progressive assessment and FCA
- CT – available for rigid licence classes only.

These assessment criteria form the basis of the approved VET training units which are utilised by jurisdictions operating under the Framework.

5.2.2 Comparison of Training and Licensing Units of Competency

In general, jurisdictions that have an outsourced service arrangement require heavy vehicle licence applicants who are undertaking training and assessment to complete one of two streams of approved training and assessment units as outlined in Table 5.2. It should be noted that NSW does not require completion of training ahead of an assessment.
Table 5.2: Comparison of Drive a Vehicle Units and Licence to Drive Units

<table>
<thead>
<tr>
<th>Unit Code</th>
<th>Pre-Framework Units</th>
<th>Unit Code</th>
<th>Framework Related Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>TLIC 2002</td>
<td>Drive a Light Rigid Vehicle</td>
<td>TLILIC 2014</td>
<td>Licence to Drive a Light Rigid Vehicle</td>
</tr>
<tr>
<td>TLIC 3003</td>
<td>Drive a Medium Rigid Vehicle</td>
<td>TLILIC 2015</td>
<td>Licence to Drive a Medium Rigid Vehicle</td>
</tr>
<tr>
<td>TLIC 3004</td>
<td>Drive a Heavy Rigid Vehicle</td>
<td>TLILIC 2016</td>
<td>Licence to Drive a Heavy Rigid Vehicle</td>
</tr>
<tr>
<td>TLIC 3005</td>
<td>Drive a Heavy Combination Vehicle</td>
<td>TLILIC 3017</td>
<td>Licence to Drive a Heavy Combination Vehicle</td>
</tr>
<tr>
<td>TLIC 4006</td>
<td>Drive a Multi-Combination Vehicle</td>
<td>TLILIC 3018</td>
<td>Licence to Drive a Multi-Combination Vehicle</td>
</tr>
</tbody>
</table>

The Drive a Heavy Vehicle training units pre-existed the Licence to Drive training units and are still largely used by jurisdictions who have not adopted the Framework. The Licence to Drive units were developed to align with the Framework, although appear to have been based on the original Drive a Heavy Vehicle units. They are utilised by jurisdictions who have adopted the Framework, as well as some other jurisdictions who have also nominated these units.

Table 5.3 compares the performance criteria under the two training units, utilising Heavy Rigid as a basis of comparison.

Table 5.3: Comparison of key content in ‘Drive’ and ‘Licence’ units of competency in the TLI Training Package, heavy rigid class vehicle

<table>
<thead>
<tr>
<th>Elements</th>
<th>Performance criteria: HR ‘Drive’ unit (TLIC3004 Drive heavy rigid vehicle)</th>
<th>Performance criteria: HR ‘Licence’ unit (TLILIC2016 Licence to drive a heavy rigid vehicle)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Drive heavy rigid vehicle</td>
<td>1.1 Heavy rigid vehicle is started, steered, manoeuvred, positioned and stopped in accordance with traffic regulations and manufacturer instructions</td>
<td>1.1 As for TLIC3004 Drive heavy rigid vehicle</td>
</tr>
<tr>
<td></td>
<td>1.2 Engine power is managed, to ensure efficiency and performance, and to minimise engine and gear damage</td>
<td>1.2 As for TLIC3004 Drive heavy rigid vehicle</td>
</tr>
<tr>
<td></td>
<td>1.3 Engine operation is maintained within manufacturer specified torque range and temperature, through effective gear selection and smooth transition in gear changes</td>
<td>Absent</td>
</tr>
<tr>
<td></td>
<td>1.4 Heavy rigid vehicle braking system is managed and operated to ensure effective vehicle control under all conditions</td>
<td>1.3 As for TLIC3004 Drive heavy rigid vehicle</td>
</tr>
<tr>
<td></td>
<td>1.5 Driving hazards are identified and/or anticipated and avoided or controlled through defensive driving</td>
<td>1.4 As for TLIC3004 Drive heavy rigid vehicle</td>
</tr>
<tr>
<td></td>
<td>1.6 Heavy rigid vehicle is driven in reverse, maintaining visibility and achieving accurate positioning</td>
<td>1.5 As for TLIC3004 Drive heavy rigid vehicle</td>
</tr>
<tr>
<td></td>
<td>1.7 Heavy rigid vehicle is parked, shut down and secured in accordance with manufacturer specifications, traffic regulations and workplace procedures</td>
<td>1.6 As for TLIC3004 Drive heavy rigid vehicle</td>
</tr>
<tr>
<td></td>
<td>1.8 Over width and overweight permit applications are completed and submitted in accordance with relevant regulatory requirements as required</td>
<td>Absent</td>
</tr>
<tr>
<td></td>
<td>1.9 Appropriate procedures are followed in a driving emergency</td>
<td>Absent</td>
</tr>
<tr>
<td></td>
<td>N/A</td>
<td>Additional performance criterion: 1.7 Load is safely and effectively restrained</td>
</tr>
<tr>
<td>Elements</td>
<td>Performance criteria: HR ‘Drive’ unit (TLIC3004 Drive heavy rigid vehicle)</td>
<td>Performance criteria: HR ‘Licence’ unit (TLILIC2016 Licence to drive a heavy rigid vehicle)</td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>2. Monitor traffic and road conditions</td>
<td>2.1 Most efficient route of travel is taken by monitoring and anticipating traffic flows and conditions, road standards and other factors likely to cause delays or route deviations</td>
<td>Absent</td>
</tr>
<tr>
<td></td>
<td>2.2 Traffic and road conditions are constantly monitored and acted on to enable safe operation and to ensure no injury to people or damage to property, equipment loads and facilities</td>
<td>2.1 As for TLIC3004 Drive heavy rigid vehicle</td>
</tr>
<tr>
<td></td>
<td>N/A</td>
<td>Additional performance criterion: 2.2 Interaction with other road users is conducted courteously in accordance with road rules to ensure safe and efficient traffic flow</td>
</tr>
<tr>
<td>3. Monitor and maintain vehicle performance</td>
<td>3.1 Vehicle performance is maintained through pre-operational inspections and vehicle checks</td>
<td>3.1 As for TLIC3004 Drive heavy rigid vehicle</td>
</tr>
<tr>
<td></td>
<td>3.2 Performance and efficiency of vehicle operation is monitored during use</td>
<td>Absent</td>
</tr>
<tr>
<td></td>
<td>3.3 Defective or irregular performance or malfunctions are reported to appropriate authority</td>
<td>Absent</td>
</tr>
<tr>
<td></td>
<td>3.4 Vehicle records are maintained/updated and information is processed in accordance with workplace procedures</td>
<td>Absent</td>
</tr>
<tr>
<td></td>
<td>N/A</td>
<td>Additional performance criterion: 3.2 Appropriate signage, lights and equipment are checked for operational effectiveness and for conformity to prescribed traffic regulations</td>
</tr>
</tbody>
</table>

In Licence to Drive but not in Drive a Heavy Vehicle
In Drive a Heavy Vehicle but not in Licence to Drive

The decision to remove performance criteria (PC) 1.9 ‘Appropriate procedures are followed in a driving emergency’ was apparently based on an inability to assess this during an on road FCA. It is recognised that an emergency cannot be safely simulated on road, however, options for developing and assessing this skill should be part of a competency assessment. Responding to the unexpected is a core element of the training of pilots and train drivers who are required to repeatedly demonstrate their capability to respond to a variety of emergency situations.

The absence of competence development in the management of emergency or unexpected events is considered to be a fundamental omission in the development of safe heavy vehicle drivers. Some of the ways that this could be achieved in a training environment include:

- Use of facilities which have skidpans and vehicle configurations which enable such emergency response techniques to be undertaken safely. This approach would be particularly relevant for consideration for HC and MC competency development.
- Use of simulators.
- Use of online scenario testing tools.
- Use of video and other teaching material on specific topics, followed by an assessment to test comprehension.
• Develop questions on emergency response e.g.
  – You blow a tyre – what factors will you need to consider to ensure you can respond and pull over safely?
  – What will you feel physically that tells you the trailer is starting to break away?

5.2.3 Safety Factors - Research

In considering whether the current heavy vehicle competencies under the Framework are sufficient, a review of coroners’ reports and safety related papers was undertaken. The literature review revealed safety related concerns in the heavy vehicle industry:

• work environment related factors
  – maintaining an appropriate physical health profile
  – loading/unloading – manual handling and workplace health and safety
  – managing fatigue
  – maintaining resilience – mental health
  – managing in cab distractions.

• vehicle control factors
  – loading and load restraint – load placement, mass management, dimension management
  – descending steep inclines (including gear selection in non-synchro gearboxes)
  – towing and loading trailers
  – managing sudden stops - retaining and regaining control in emergencies and low-adhesion conditions
  – on road manoeuvres.

Work Environment Factors

• The health profile of heavy vehicle drivers which is influenced by their long hours worked, consumption of poor quality food and sedentary nature of driving, contributes to an increased risk of sleep apnoea, diabetes and cardiovascular disease, stress and osteoporosis (Williams, 2014).

• The physical work environment places drivers in close proximity to moving vehicles including forklifts. Their roles also require physical exertion in loading and unloading and can place drivers at heights on unstable platforms heightening the risk from sprains, striking, crushing and falls (Williams, 2014). Loading and unloading incidents are significantly represented in injury and fatalities for drivers eg: 40% of serious injuries to truck drivers in NSW arose during loading and unloading (Williams, 2014). 15% of truck related fatalities occur during loading/unloading (Safe Work Australia, 2014).

• Fatigue is involved in around 20% of crashes (UNSW, 2015). Despite this widely known influence, almost 40% of drivers have admitted to being usually or sometimes tired before setting out on a trip (Haworth et al., 1991).

• Employed truck drivers have almost three times the suicide rate of all employed persons (Coroners Court of Victoria, 2015) and face more barriers for seeking treatment for mental health related issues than the general population (CASR, 2011).

• With the increasing use of drivecam technology the impact of driver distraction (e.g. inserting a CD, reaching for a drink, using a mobile phone) is being noticed by employers (Toll Group, 2015).
Vehicle Control Factors

- Vehicle loading unloading and restraint has been the subject of consideration by the NT and NSW Coroner’s Courts (Dillon, 2016) who found that improper loading of trailers and restraint of loads contributed to road related deaths.

- Several fatal accidents involving heavy vehicles occurred on the steep descent of the South Eastern Freeway in to Adelaide in 2010 and 2014 leading to a recommendation for increased focus on steep descents in heavy vehicle driver training. Austroads’ report *Use of Auxiliary Brakes in Heavy Vehicles* (Austroads, 2014) undertook a comprehensive review of braking and recommended a package of training to improve driver skill and capability. Technology advances in braking systems in new vehicles require drivers to understand how they operate, particularly when paired with other vehicle components which are not fitted with the same technology.

- The NSW coroner’s investigation into the death of Matthew Donnelly recommended that there be consideration of the need for increased focus on towing and loading trailers as part of heavy vehicle training (Dillon, 2016).

- The Qld Coroner’s inquest into the death of Scott Anthony Bennett found that the heavy vehicle driver had not experienced a jack-knife before and had no particular training for this event, had not been taught that pulsing the brakes may assist, and did not know that trailers without loads make a difference in relation to braking characteristics (Lock, 2014).

- Sudden stopping is only one element of a range of situations where drivers are required to take action in an emergency situation. As outlined in Section 5.2.2, this performance criterion was removed from the Licence to Drive Unit. Responding to unexpected situations is a substantive element of pilot and train driver training and yet is absent from heavy vehicle driver training.

- ARRB identified the ability to manage on road risks and manoeuvres as an area requiring greater focus including overtaking, narrow shoulders and tight turns as well as the impact of differing loads such as live loads and partially filled compartments.

- Table 5.4 analyses the extent to which these work environment and vehicle control factors are considered in the Licence to Drive units. In some instance elements may be covered in other approved driving operations training units.

### Table 5.4: Comparison of content of HR licensing unit (TLILIC2016 Licence to drive a heavy rigid vehicle) and known safety risk areas

<table>
<thead>
<tr>
<th>Safety risk area</th>
<th>Where covered in the HR licensing unit of competency</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maintaining an appropriate physical health profile</td>
<td>Not covered</td>
<td>Unit deals only with vehicle operation.</td>
</tr>
<tr>
<td>Loading/unloading – manual handling</td>
<td>Not covered</td>
<td>May be covered in TL31216 Cert III in Driving Operations core unit TLID1001 Shift materials safely using manual handling methods</td>
</tr>
<tr>
<td>Managing fatigue</td>
<td>Not covered</td>
<td>May be covered in TL31216 Cert III in Driving Operations core unit TLIF2010 Apply fatigue management strategies</td>
</tr>
<tr>
<td>Maintaining resilience – mental health</td>
<td>Not covered</td>
<td>May be covered in TL31216 Cert III in Driving Operations elective unit HLTWHS006 Manage personal stressors in the work environment</td>
</tr>
<tr>
<td>Managing in-cab distractions</td>
<td>Not covered</td>
<td>Appears not to be covered in any TL31216 Cert III in Driving Operations core or elective unit</td>
</tr>
<tr>
<td>Loading, unloading and load restraint</td>
<td>PC 1.7 Load is safely and effectively restrained</td>
<td>May need attention to load placement and distribution, mass management, estimation of heights etc</td>
</tr>
<tr>
<td>Safety risk area</td>
<td>Where covered in the HR licensing unit of competency</td>
<td>Comment</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Descending steep inclines (including gear selection in non-synchro gearboxes)</td>
<td>PC 1.3 Braking system of heavy rigid vehicle is managed and operated efficiently to ensure effective control of vehicle under all conditions</td>
<td>This PC only partly covers the necessary content. Requires attention to managing gear selection, gear changing, recovering lost gears, use of auxiliary brakes etc</td>
</tr>
<tr>
<td>Towing trailers including coupling/uncoupling, reversing</td>
<td>Not covered</td>
<td>Towing trailers only appears in HC &amp; MC units. Coupling, uncoupling &amp; towing should be included in all HV classes licensing units</td>
</tr>
<tr>
<td>Managing sudden stops - retaining and regaining control in emergencies and low-adhesion conditions</td>
<td>PC 1.3 Braking system of heavy rigid vehicle is managed and operated efficiently to ensure effective control of vehicle under all conditions</td>
<td>Needs additional content on skid avoidance &amp; recovery</td>
</tr>
<tr>
<td>On road manoeuvres including tight turns and bends; overtaking</td>
<td>1.1 Heavy rigid vehicle is started, steered, manoeuvred, positioned and stopped in accordance with traffic regulations and manufacturer instructions</td>
<td>Greater attention required to higher risk road situations</td>
</tr>
</tbody>
</table>

This indicates that the existing licensing units deal inadequately with a number of safety related driving factors.

5.2.4 Vehicle and Related Technology

Vehicle design and technical features are constantly evolving. While many of these features are vehicle specific and should be explained in situ, drivers should have a broad understanding of features and impacts. ARRB suggested coverage of areas such as:

- on board scales including calibration and managing increasing loads (e.g. refuse)
- liftable axles
- steerable axles and active steering systems such as Truckaxle
- use of tippers including long body tippers
- use of electronic braking systems and roll stability program including implications for matching of equipment, learning algorithms and impacts of 12V and 24V systems.

Drivers should have basic knowledge of these features so that when confronted with them they are aware of the need for greater investigation and training before active use.

5.2.5 Industry Input

From the industry survey, heavy vehicle operators and training organisations indicated which areas required greater emphasis in training and licence assessment. Figure 5.1 shows the responses from the 212 respondents.

For those who provided commentary in relation to this question there was support for:

- increased emphasis on heavy vehicle regulation in particularly the requirement for and completion of work diaries
- loading – although some respondents were of the view that this could only be taught on the job as load types varied substantially
- basic mechanics or at least mechanical diagnostics
- gear box usage
- reversing.
Understanding Heavy Vehicle Regulation and Policy

Heavy vehicle regulation is designed to increase safety, manage road infrastructure impact and respond to community amenity issues. Heavy vehicle drivers who fail to understand these regulatory requirements are a potential danger to themselves and other road users.

While there is a knowledge component in all jurisdictional heavy vehicle licence arrangements, further attention to this area is warranted. Some of the key areas identified by ARRB which need focus are:

- fatigue including log books and electronic work diaries
- load restraint and axle mass limit schemes
- restricted access vehicle combinations and access conditions.

The Framework currently requires that a knowledge test be undertaken only once for a rigid licence and once on upgrade to a combination licence. It is assumed that this was based on an intent to reduce red tape as well as a belief that once a person had demonstrated their knowledge this did not need to be re-established. However, heavy vehicle regulation and policy changes rapidly and people forget things they once knew, particularly where they have not had to apply it in practice.

There is industry stakeholder advice that some training organisations provide licence applicants with a copy of the knowledge test to undertake at home and in some instances also provide a copy of the answers as part of the 'take home' package. Not only is there no assurance as to the person who completed the knowledge test under this scenario, where answers are provided for rote completion of a test there is no learning involved. The ready availability of computer based testing, with suitable authentication of the person, provides the opportunity for unique individualised testing with questions randomly selected from an online bank of questions.

5.3 Driver Competency and Job Skills

Feedback from driver training organisations and transport employers strongly indicated that many newly licensed heavy vehicle drivers lack the proficiency needed to be immediately employable. This appears to be particularly so when the driver has completed a course and licence assessment within a day or less and has little on road driving experience. Survey responses from industry included the following comments:

- Most drivers that have attained their licence via an RTO have very little to no prior driving experience in traffic or on highways.
• It should be structured like any other trade. Start as a first year apprentice and work your way through the various classes of vehicles. It should be mandatory they spend at least three months in a workshop supervised to do basic servicing and checks of vehicles.

• Drivers who are trained in the city have no idea how to drive on unsealed remote roads and they leave saying ‘this is not what I learnt.’

Stakeholders provided a wide variety of views about whether a heavy vehicle licence should focus purely on the task of driving or cover wider skills which are typically required to carry out a heavy vehicle driving role. Some believe that unless these broader skills were included in a licence qualification the skills would often not be developed. Others believe that the environment in which heavy vehicle drivers work differs so markedly that it is not possible to expect a licence qualification to make a person job ready for all situations.

The remainder of this section discusses:
• the make up of the heavy vehicle fleet and what this means for the environments in which heavy vehicle drivers operate and therefore skills required
• other training available to develop broader heavy vehicle related skills
• role of employers in skill development.

5.3.1 Heavy Vehicle Driving Task

Table 5.5 provides insight in to the make up of the vehicle fleet as well the size of the customer fleets. While there is not a direct correlation between vehicles and drivers it is a reasonable indication of how and why heavy vehicle licences are held.

<table>
<thead>
<tr>
<th>Customer Segment</th>
<th>With 1 - 5 Heavy Vehicles</th>
<th>With 6 - 15 Heavy Vehicles</th>
<th>With 16 - 40 Heavy Vehicles</th>
<th>With 41 - 99 Heavy Vehicles</th>
<th>With 100 and over Heavy Vehicles</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prime Mover and/or Combination</td>
<td>7.8%</td>
<td>2.9%</td>
<td>2.1%</td>
<td>1.4%</td>
<td>1.6%</td>
<td>15.8%</td>
</tr>
<tr>
<td>Rigid Truck</td>
<td>24.3%</td>
<td>4.3%</td>
<td>2.9%</td>
<td>2.0%</td>
<td>2.9%</td>
<td>36.4%</td>
</tr>
<tr>
<td>Trailer with ATM &gt;4.5 t</td>
<td>9.9%</td>
<td>5.6%</td>
<td>4.6%</td>
<td>3.6%</td>
<td>4.8%</td>
<td>28.4%</td>
</tr>
<tr>
<td>Special Purpose Vehicle</td>
<td>6.3%</td>
<td>3.1%</td>
<td>1.7%</td>
<td>1.0%</td>
<td>1.6%</td>
<td>13.8%</td>
</tr>
<tr>
<td>Omnibus</td>
<td>1.4%</td>
<td>0.7%</td>
<td>0.7%</td>
<td>0.6%</td>
<td>1.7%</td>
<td>5.0%</td>
</tr>
<tr>
<td>Motorhome</td>
<td>0.5%</td>
<td>0.007%</td>
<td>0.001%</td>
<td>0.000%</td>
<td>0.001%</td>
<td>0.6%</td>
</tr>
<tr>
<td>Total</td>
<td>50.4%</td>
<td>16.6%</td>
<td>11.8%</td>
<td>8.6%</td>
<td>12.7%</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Source: NHVR, 2016

Key characteristics which can be drawn from this table are:
• 50% of the heavy vehicle fleet is owned by people who have five or less vehicles in their fleet and therefore are unlikely to have the resources or capability to invest significantly in the training and upskilling of their drivers except through mentoring or on the ground support.

• Rigid trucks make up the single largest segment of the fleet at 36%, however the total of prime movers/combinations and trailers over 4.5 tonne is 44% pointing to longer haul work as a significant part of the heavy vehicle driver task.

• At 5% buses make up a small percentage of the overall heavy vehicle fleet.
• A small but significant part of the fleet are special purpose vehicles whose use of the road, and hence driver skills, are often quite different to those required to drive a truck or bus.

Further understanding of the truck fleet (i.e. excludes buses; special purpose vehicles etc) is provided by whether the vehicles are owned by:

• hire and reward operators: transport and logistics businesses that are focused on providing trucking services (45% of the fleet)
• ancillary operators: businesses whose main activity is something other than transport, but which have truck fleets to transport their own products (55% of the fleet) (NTI, 2016).

Heavy vehicle drivers are therefore not a homogenous group in terms of the driving task or the environment in which they work. This diversity is further added to when taking in to account:

• the nature of the heavy vehicle task e.g. people, livestock, fresh produce, logging, machinery
• whether the driver loads/unloads the vehicle and undertakes repairs and maintenance etc or whether others do these ancillary tasks
• urban, regional or remote work.

This analysis points to a wide variety of environments in which heavy vehicle drivers operate. While there may be strong grounds for broadening the competencies in a heavy vehicle licence training and assessment package, it is clear that it could never reasonably cover the job skills required for all circumstances.

5.3.2 Other Available Training

There are two key forms of training available to support a person seeking a career in the transport sector:

• VET sector
• Industry based.

VET Sector

The approved Licence to Drive and Drive a Heavy Vehicle training units are only a sub-set of the available heavy vehicle related approved VET offerings. Specifically, there are three certificates which offer a more rounded set of job skills:

• TLI21216 Certificate II in Driver Operations: a basic preparation for roles such as a courier or taxi truck driver, usually involving the lighter classes of heavy vehicles and relatively short distance runs. It includes as elective units, the licensing units up to and including TLILIC2016 Licence to drive a heavy rigid vehicle.
• TLI31216 Certificate III in Driver Operations: which equates to trade status, aims to prepare people for roles such as tipper driver, local general heavy freight driver, line haul driver and for specialisations such as concrete agitator driver. It includes as elective units the full range of licensing units up to TLILIC3018 Licence to drive multi-combination vehicle.
• TLI42116 Certificate IV in Driver Operations: which equates to post-trade status, aims to prepare drivers for high responsibility specialist roles such as an articulated fuel or LPG tanker driver.

There are a range of core and elective units in each of these certificate courses which provides the ability to tailor a course to meet the specific needs of an individual driver and/or employer. It is noted however that in practice RTO’s often provide a ‘one size fits all’ training program, which is more cost effective for them to deliver. A conscientious RTO will select those units that are most likely to prepare the new driver for employment in roles that are in demand. This involves consultation with local employers and this level of contact between employers and some RTOs does occur in some instances.
The relevant licensing unit such as *Licence to drive a heavy rigid vehicle* is only **one** of the core units in the certificate qualification, but does **not**, by itself, develop immediate and complete work readiness. This is a critical point which is often missed by individual licence holders and the heavy vehicle industry itself.

A comparison of the course duration periods utilised by the Victorian government for funding purposes demonstrates the clear difference between the level of complexity and coverage between a licence attainment and a course intended to equip a person for a job in the transport sector, therefore:

- between 40 – 60 hours to obtain a licence
- more than 400 hours for a certificate level course in driver operations.

While these certificate level courses are available, there has been little recent take up. Enrolments have been found to depend heavily on government funding support and transport companies are reluctant to support industry traineeships, using these courses, without such funding. Unlike in other industries, group training schemes which enable a trainee to be rotated amongst a range of employers are not used in preparing heavy vehicle drivers.

**Industry Based**

The Victorian Transport Association (VTA) has been active in developing initiatives to support people entering the industry and have developed two programs:

- One-day ‘Transition to Transport’ course provides an introduction to the industry. The course is run monthly and is regularly fully subscribed.
- Eight-day ‘Driver Delivery’ program that provides training, mentoring and behind the wheel experience to new drivers of heavy vehicles. The program, which reflects some of the characteristics of formal group training schemes in a condensed program, entails two levels of training – an ‘industry-ready’ licence course in heavy rigid vehicles and heavy combination vehicles. Behind the wheel training is spread over several days with a maximum of five hours on any day, to avoid learning fatigue. A number of transport companies have provided support for the program indicating they will actively seek to take on people who have undertaken the program. However, take up of this course, just as with the certificate level courses, was relatively low prior to the provision of government subsidies.

In WA there has been an industry driven initiative known as the Heavy Vehicle Industry Safety and Training Alliance which has been lobbying for mandatory training as part of obtaining a heavy vehicle licence. They are also proposing a traineeship style program for new entrants with an integrated program of development before a person is considered a competent professional driver. Their approach is based on a combination of the following for a person to be considered competent:

- heavy vehicle licence
- accredited training (e.g. TLISS00157 Road Transport Driver Skill Set or Certificate III in Driver Operations)
- accredited driving experience (500 hours).

**5.3.3 Role of Employers**

Safe Work Australia provides the following advice about employer responsibilities:

*Your boss must:*

- **Show you how to do your job safely or make sure someone shows you how to do your job safely**
- **Make sure there is someone to watch out for you**
- **Not ask you to do anything that needs a special licence, like drive a car, a crane or a forklift if you don’t have the right licence**
- **Have the right tools and equipment for you to do your job safely**
- **Give you safety equipment if you need it to do your job** (Safe Work Australia, 2017).
While the legislative wording will vary between states and territories, all place obligations on employers, under workplace health and safety laws, to ensure their employees know how to undertake the duties of their role.

In addition, chain of responsibility legislative requirements place overarching requirements which would reasonably extend to ensuring employees are skilled and capable to undertake their roles.

When asked how they ensured new drivers had broader skills to do their role, heavy vehicle operator survey respondents predominantly indicated that new drivers were supervised for a period by an experienced operator and/or received in-house training. The results are detailed in Figure 5.2

Figure 5.2: New driver skills development survey responses (n=115)

5.3.4 Implications for Licensing

Given the wide variety of work environments and the consequent variation in responsibilities that will accrue to a heavy vehicle driver in different roles, it is unreasonable to expect a heavy vehicle licence to fully equip a person for the potential and actual breadth of their job responsibilities. The types of vehicles that people will drive and the workplace requirements will vary substantively between employers.

Importantly the Licence to Drive unit is only one of the competency elements in a VET level certificate course which is designed to ensure a person is job ready.

Heavy vehicle licensing should remain focused on the safe smooth and efficient operations of a heavy vehicle with other training programs and employer based support and mentoring providing the broader capabilities to enable a person to undertake their specific role. A heavy vehicle licence should be regarded as minimum (although not minimal) entry requirement and not the complete package of skills and capabilities. This does not imply that there should not be changes to the current heavy vehicle competencies, however these should be focused on safety rather than job readiness. Further, it is reasonable to argue that the bar for issuing a licence should be set sufficiently high to ensure that a licence holder is able to operate the common vehicle sizes, styles and configurations likely to be met within a particular vehicle class – a requirement which is not currently met in many instances.
5.4 Key Themes and Findings

- Based on this report findings, there are a number of areas where the competencies under the Framework should be strengthened or added. In particular, greater emphasis should be placed on the development of skills in responding to contingencies - options such as simulators, off road skid pans, video and associated tests could be considered.

- Even with suggested strengthening, the Framework competencies and Licence to Drive units will not cover all the skills and capabilities required to make a person job ready. Certificate level courses are offered by the VET sector and industry based training programs provide options for broader skill development. There is also a responsibility on employers to ensure their drivers are capable and trained to undertake the specific duties and circumstances of their role.

- Greater emphasis on knowledge tests, which are challenging, comprehensive and truly assess understanding, including coverage of a range of regulatory requirements should be considered by Austroads.
6. Adequacy of Current Training and Assessment

Section 5 discussed a range of areas where consideration should be given to potential augmentation of the current Framework competencies. This section deals with the issue of delivery of the current training and assessment. While the focus of this report is on the Framework and its delivery, the principles and issues discussed are relevant in most jurisdictions offering outsourced delivery. Specifically, it discusses:

- course duration
- training resources
- capability of trainers and assessors
- licence assessment
- impacts of commercial outsourcing.

6.1 Course Duration

The duration of licensing related training and assessment programs needs to take in to account the content to be covered and individual skills and capabilities. The approach taken should be based on adult learning principles and ensure sufficient time and attention to ensure real, as opposed to surface, competency.

6.1.1 Adult Learning

Adult education recognises that developing proficiency in a skill requires more complex skills to be built on smaller, simpler skills. Proficiency also takes practice and requires progressive development.

*Unconscious Incompetence* – the state of not knowing what one does not know

- Conscious incompetence – awareness that one does not know or cannot do something
- Conscious competence – the state of being able to perform competently when focusing consciously
- Unconscious Competence – the state where a person can perform the action proficiently without consciously directing themselves.

Adult education also recognises that most learners require significant direction by a trainer in the early stages of learning a new action, as they are less able to self generate unfamiliar skills or to self correct. Frequently this also requires the *un-learning* of some skills or behaviours. During the interviews of training organisations, it was mentioned that older/more experienced heavy vehicle driver learners (particularly applicants for upgrade to HC or MC) often needed to un-learn behaviours related to gear changing and outdated road laws.

Effective learning also requires *over-learning*, where a learner continues to practice a skill after that skill has been mastered, in order to ‘lock in’ mastery. According to researchers, overlearning is probably helpful for quick motor sequences as in basketball or ballet (Turner, 2017). ‘Quick motor sequences’ are found in many driving actions, such as when a driver must co-ordinate braking, steering and gear changing in response to urban driving, or respond to a contingency such as emergency braking or skidding.
Short duration training is unlikely to enable the development, even to the level of conscious competence, of more than the most basic driving skills, unless the individual learner already possesses most of those skills at the beginning of the training program.

### 6.1.2 Nominal Hours

As previously discussed, competency-based learning and assessment is based not on ‘time spent’ but attainment of the relevant competence. Prior learning and individual capabilities mean that the time taken to be assessed as competent will vary between students.

A key question for licensing regulators is whether there is a duration below which a person cannot reasonably have obtained sufficient proficiency. Unfortunately, there are no recommended timeframes or ranges provided as part of the Licence to Drive units. However, the Victorian Department of Education (State of Victoria, 2017) specifies nominal hours for qualifications and units of competency. These specify the minimum and maximum hours that an RTO can claim payment for under government subsidy programs. Although these hours cannot be imposed when the training is not directly funded by government, they do provide guidance on the amount of supervised training that should occur. Currently, these hours are:

- TLILIC2014 Licence to drive a light rigid vehicle – 40 hours
- TLILIC2015 Licence to drive a medium rigid vehicle – 40 hours
- TLILIC2016 Licence to drive a heavy rigid vehicle – 50 hours
- TLILIC3017 Licence to drive a heavy combination vehicle – 60 hours
- TLILIC3018 Licence to drive a multi-combination vehicle – 60 hours.

It is also of interest to note the timeframes for the more substantive courses targeted at developing professional drivers which were discussed in Section 5.3.2:

- TLI21216 Certificate II in Heavy Vehicle Driving Operations – 465-480 hours
- TLI31216 Certificate III in Heavy Vehicle Driving Operations – 594-625 hours

Feedback from the online survey of driver training providers shows that the claimed median duration of training for a rigid vehicle licensing course is 1-4 hours for the off-truck component in both rigid and articulated vehicle classes and 9-16 hours for the behind the wheel component. Therefore, there is a claimed median course length of 10-20 hours compared to the Victorian Government recommendation of 40-60 hours.

It is of note that the interviews conducted with RTOs suggests that the claimed indicative times (i.e. 10-20 hours) is an overstatement. It is probable that ‘better’ training providers chose to respond to the survey so results are likely to be skewed to provide input from providers running more comprehensive courses. A review of training provider websites backs up the view that there are a number of providers offering courses at considerably less than the indicated 10-20 hours.

### Impacts on Learning

There are three essential components of any training program – induction; theory and practical.
The *induction* of a student is an essential component of the training program. To be effective, learning programs also must take account of the individual learner’s preferred learning style, and the learner’s existing skills and knowledge. ASQA’s guidance materials suggest that to meet the requirements of the Standards RTOs should:

*Analyse the nature of your learner cohort. Use the analysis and any specific requirements of the training product to determine how your RTO will schedule training and assessment activities to ensure learners are able to fully develop the required skills and knowledge prior to being assessed (ASQA, 2015).*

Although RTOs are explicitly required to provide advice to each student about the training product, this is unlikely to be done thoroughly, if at all, by training providers running short programs eg: ‘licence in a day’.

The short duration of heavy vehicle driver training programs also leaves little time for essential *theory* to be presented, discussed and assimilated. The body of theory now required is significant, and a heavy vehicle driver’s legal responsibilities continue to grow as new regulations are introduced. The knowledge components specified in the heavy vehicle units of competency typically cover the following:

- emergency procedures
- quality assurance procedures
- relevant standards and certification requirements
- state/territory heavy rigid vehicle driving licence and permit requirements
- state/territory road rules
- vehicle log book or record book (where required)
- vehicle manufacturers instructions, specifications and recommended driving procedures including preoperational checks of vehicle
- workplace driving instructions and procedures
- relevant state/territory environmental protection legislation
- relevant state/territory fatigue management regulations
- relevant state/territory permit regulations and requirements
- relevant state/territory road rules
- relevant state/territory roads and traffic authority driving regulations and licence/permit requirements pertaining to heavy rigid vehicles
- relevant state/territory work health and safety legislation (AIS, 2017).

It is estimated that full coverage of this theory content alone, to the stage where it could be assimilated by a novice learner through the use of examples and case studies, could easily require 1-2 days. It is not satisfactory for an RTO to pass this responsibility back to the learner, via study of the relevant jurisdiction’s heavy vehicle manual and completion of the regulator’s online knowledge test. The RTO still has a legal responsibility to ensure that the content is understood and is able to be applied in real life driving situations by the learner, before ‘signing off’ an assessment.

Of more immediate significance to safety is the short duration of *practical* experience that learners in many heavy vehicle courses gain, particularly in the ‘licence in a day’ courses.

**Mandating Nominal Hours**

The issue of short courses being offered by training providers at durations that are considerably less than the recommended timeframes was addressed by ASQA in their 2017 report *A Review of Issues Relating to Unduly Short Training*. 
The central tenet of competency-based training is that a learner’s rate of progress is determined by their demonstrated competency, rather than by how long they have spent training. Nevertheless, providing courses of sufficient duration is clearly a prerequisite of providing quality training and assessment (ASQA, 2017, pg 55).

The ASQA report outlined case studies where government regulators had chosen to mandate course duration for a number of purposes:

- the nominal hours set for national reporting purposes, which are seen as a critical tool for policy development, evaluation and accountability in the system
- the nominal hours used by funding and purchasing agencies to ensure some quality measure around what they are buying
- the nominal durations in apprenticeships sought by industry to provide an assurance about the competence of graduates
- the durations mandated by occupational licensing regulators due to their concern about short duration VET qualifications (ASQA, 2017, pg 56).

There is therefore precedent for the mandating of minimum training and assessment duration for specific offerings through the VET sector. It should be noted however that while ASQA accepts the positions of regulators in mandating minimum hours, it is in conflict with the concepts of recognition of prior learning on which the sector is based. However, in a step to address some of the issues in overly short course provision, ASQA is considering setting minimum course durations for new learners.

There is precedent for transport regulators mandating minimum contact training requirements in other areas. At least two jurisdictions (Victoria and Queensland) have put in place minimum contact training requirements for motorcycle assessments, and in the case of Queensland have mandated the minimum training package to be provided. In both cases there was originally no mandated training period with assessment reliant on a competency based approach. The decision to mandate training duration was made following concerns about the skills and capabilities of some people who have been assessed as competent by outsourced providers.

The amount of time that should be mandated as minimum, requires consideration and consultation with a range of stakeholders. Without suggesting that this is an appropriate standard, it is of note that Ontario, Canada requires a minimum 103.5 hours of instruction to obtain a commercial heavy vehicle licence (Ontario, 2017).

### 6.2 Training Resources

One reason for the present inconsistencies in the depth and breadth of heavy vehicle driver training content, as delivered by different organisations, is the lack of a nationally agreed set of learning and assessment materials to support training and assessment activity.

An industry Training Package has two types of components:

- endorsed components – those that have been subject to a national sign off process by the AISC; these include the units of competency, assessment guidelines and the ‘qualifications’ - which are actually statements of compulsory units of competency
- non-endorsed components – not subject to national signoff process – which include support materials for learning, training, assessment and professional development, such as student guides, training plans, session outlines, reference materials etc.

Although it was intended when Training Packages were first introduced in 1996 that both types of components would be produced nationally (thus making the package complete, and supporting consistent delivery of training and assessment), this is often not occurring. At present no national support materials appear to be available for the Certificates II and III in Driving Operations, or for the individual heavy vehicle Drive a Heavy Vehicle and Learn to Drive units. Individual RTOs are being left to develop their own course materials, or purchase them from outside suppliers, raising quality and consistency issues.
6.3 Capabilities of Trainers and Assessors

Two professional VET qualifications are relevant to heavy vehicle driver instructors and assessors:

- TAE40116 Certificate IV in Training and Assessment (and its immediate predecessor TAE40110, during the period of transition to the new qualification)
- TLI41316 Certificate IV in Transport and Logistics (Road Transport – Heavy Vehicle Driving Instruction) (and its immediate predecessor TLI41310, during the period of transition to the new qualification).

The qualifications and additional characteristics required of heavy vehicle driver trainers and assessors reflect interaction between:

- the mandated professional qualifications as prescribed by the RTO Standards and therefore as conditions for the registration of a training organisation
- the requirements and conditions imposed by jurisdictional transport authorities for approval/authorisation of instructors, assessing organisations and/or individual assessors
- the requirements of individual RTOs.

6.3.1 RTO Standard Mandated Qualifications

All trainers and assessors delivering nationally recognised training, irrespective of which industry qualifications they deliver, must hold appropriate training and assessment qualifications as detailed in the Standards. From 1 April 2019, the required qualification is the TAE40116 Certificate IV in Training and Assessment. The RTO Standards do allow for a person who does not yet hold TAE40116, to conduct training under the supervision of a fully qualified trainer/assessor; however, the not yet qualified person must not make assessment decisions i.e. cannot perform licensing assessments.

The Standards also allow for a person to conduct assessment only as long as that person holds specified competencies as per the Standards (clause 1.15).

The Standards do not require heavy vehicle driving instructors to hold the driving instructor qualification (TLI41316 Certificate IV in Transport and Logistics (Road Transport – Heavy Vehicle Driving Instruction)) to conduct training or assessment for heavy vehicle driver licensing. However, the trainer/assessor must have vocational competencies at least to the level of the course being delivered.

Just as there is evidence of short courses which are unlikely to provide an outcome of sufficient standard for heavy vehicle training, there are similar issues with delivery of the Certificate IV in Training and Assessment.

The Australian Qualifications Framework indicates that typically, a Certificate IV qualification will take from 6-24 months full-time study (1200-2400 hours) to complete. That is, it should take a minimum of over 1,200 hours study, split between theory, practical and assessment tasks. In 2017 ASQA completed an investigation into course durations. Their review found that for TAE40116 Certificate IV in Training and Assessment, 31.32% of the 182 relevant RTO course advertisements surveyed were offering a course duration of less than half the recommended minimum volume of learning (ASQA, 2017). Some RTOs are currently advertising courses which would take 5-10% of the recommended time.

6.3.2 Transport Regulator Requirements

Jurisdictions currently require driver trainers and assessors to have some or all of the following:

- TAE40116 Certificate IV in Training and Assessment or specified units of this course – in a number of cases only two or three units of this certificate level course are mandated

---

2 They may also hold TAE40110 with additional units; or a diploma or higher level qualification in adult education. Prior to 1 April 2019, trainers and assessors may also deliver training and assessment if they hold the TAE40110 Certificate IV in Training and Assessment.
• TLI41316 Certificate IV in Transport and Logistics (Road Transport – Heavy Vehicle Driving Instruction).

The heavy vehicle driver instructor qualification TLI41316 Certificate IV in Transport and Logistics (Road Transport – Heavy Vehicle Driving Instruction) comprises 18 units of competency, of which 13 are core and five are the Drive a Heavy Vehicle units for the various heavy vehicle categories. Successful completion requires 14 units, i.e. the 13 core units and a Drive a Heavy Vehicle unit relevant to the vehicle type applicable to the job (https://training.gov.au/Training/Details/TLI41316).

Only two of the core units in the TLI41316 qualification are concerned directly with providing heavy vehicle driver instruction:

• TLIM0002 Conduct heavy vehicle driver training
• TLIM4002 Develop safe heavy vehicle driving behaviour in others.

However, these units are extensive and, when learned thoroughly, should provide a solid foundation for instructing others.

ASQA found that for TLI41210 Certificate IV in Transport and Logistics (Road Transport – Car Driving Instruction), 85.71% of the advertised programs surveyed indicated a duration of less than half the minimum recommended. Although this finding related to car driver instructor training courses rather than heavy vehicle instructor training courses, it is indicative of what may also be happening in the development of heavy vehicle driving instructors.

It is noted that for those jurisdictions who have adopted the Framework, there is a consistent move to licensing regulator development of specific training material for instructor/assessors in the competency assessment guideline. This training material, while still under development in some cases, is quite extensive and for durations up to five days. This focus on ensuring assessors are skilled is supported by the research undertaken for this project. However, as this material is specifically focused on the heavy vehicle assessment guidelines and process, there should continue to be a requirement for all or some of the currently mandated certificate qualifications outlined above. These certificate units provide foundation capabilities not related to the content of specific heavy vehicle assessment activities.

6.3.3 Individual RTO requirements

RTOs may impose additional requirements on their instructors, such as:

• first aid qualifications
• durations and/or types of professional experience
• satisfactory completion of a driving skill check.

6.4 Licence Assessment

Although the developers of the Framework (Appendix A) and supporting National Heavy Vehicle Assessment Guide (Appendix B) intended that it would provide licensing authorities with a ‘nationally consistent process and instrument for assessing the competency of licence applicants’, this has not yet eventuated. The assessment process and instruments remains a mixture of VET assessment against the licensing units of competency and transport regulators’ jurisdictionally developed assessment processes and instruments. This is complicated by the provisions under the Framework for a licence applicant to be assessed through a CT without undertaking formal training.

As defined in the Standards for VET Accredited Courses (2012), assessment means the process of collecting evidence and making judgements on whether competency has been achieved, to confirm that an individual can perform to the standard expected in the workplace, as expressed by the relevant endorsed industry/enterprise competency standards of a Training Package or by the learning outcomes of a VET accredited course.
There is an implicit assumption that the licence assessment will examine the applicant against all the criteria that are deemed to be essential to effective, efficient and safe performance. Some of those criteria may require complete and consistent adherence to the standard (‘Immediate Fail Items’); others that are ‘should have’ rather than ‘must have’ may allow for some flexibility, within prescribed limits of completeness and/or consistency. There is also an assumption that the licence assessment will be carried out rigorously, and without fear or favour.

Importantly, the FCA does not include a final assessment of an applicant’s ability to perform all criteria. As a result, short cuts are being taken when training the criteria that is not included in the FCA. This includes critical skills such as secure load, reversing, coupling and uncoupling of trailers.

6.4.1 Gaming the licence assessment system

Most training providers interviewed reported cases of the ‘gaming’ of the licence assessment system by other training providers. Their evidence came from direct observation of assessment sessions, from reports by employers regarding the inadequate skills of some newly licensed drivers, and from reports by new licence holders of assessment practices used during their own licence test. These irregularities included:

- failure to assess the applicant’s competency in loading and restraining loads
- failure to require the applicant to demonstrate competency in coupling and uncoupling trailers
- using test routes that did not present sufficient challenges or meet minimum conditions of assessment
- providing guidance to the licence applicant during the licence assessment drive, in contravention of assessment guidelines (including by signalling to the licence applicant beneath the test vehicle’s dashboard out of sight of the in cabin camera)
- using test vehicles that do not meet industry standards, for example by de-rating the vehicle’s tray to allow a light load to be carried during the licence assessment, or by using unduly short trucks.

There was widespread anecdotal evidence of driver training providers ‘teaching to the licence test’, ‘teaching to the test route’ and even ‘teaching to the licence assessor’ where this was known upon booking a licence assessment. These approaches were seen to be the only way of providing short duration courses with any prospect of getting the licence applicant through the licence test. That such applicants could ‘pass’ their licence test indicates that the assessment system is failing in its purpose.

Some of these failings can be attributed to the inadequacy of the assessment standards in the heavy vehicle driver instructor qualification, which result in instructors not being fully prepared as assessors. Some can be attributed to the lack of detail in the heavy vehicle licensing units of competency used in the Framework, which leaves scope for minimalist interpretations. Some can be attributed to the relaxation of some criteria in the assessment tools provided by state/territory regulators. And some can even be attributed to the lack of national assessment resources for each unit of competency. But much appears to be due to the deliberate actions of many heavy vehicle driver training providers to minimise the duration (and hence, the scope and quality) of the training delivered.

6.4.2 Conditions Under Which Assessment Occurs

Within each competency unit, the Range of Conditions Statement and Assessment Conditions Statement are crucial to completeness and consistency in training and assessment. They describe the breadth of situations in which the learner must develop competency and in which the candidate must demonstrate competency. In turn, this guides RTOs in determining course content, structure, resourcing and course fees.

Taking the unit TLILIC2016 Licence to drive a heavy rigid vehicle as an example, very few conditions are specified, and those that are, are of a very general nature. While it might be expected that the unit would specify that the training and assessment would develop the learner’s skills in driving in a range of conditions, this is not the case. The unit only refers to the assessment occurring:

- on open and/or private roads with moderate inclines and declines
• (under) typical weather conditions.

There is no reference in the HR licensing unit to the following variables known to affect driving safety:

• range of weather conditions – wet, windy, foggy
• time of day/light conditions – dawn and dusk, sun in eyes, night
• road surface – low traction (slippery), rough, unsealed, water over road
• road gradient – rolling, mountainous
• road curvature – tight bends, hairpins, decreasing radius bends, off-camber bends
• road lanes – narrow, shoulderless, multiple, merging.

Many of these conditions were included in the superseded unit, TLI2016A. The Companion Volume for the Training Package does refer to some of these conditions, but is often not consulted by RTOs. It is also unclear why such crucial information is not included in the unit of competency itself, and in the assessment guidelines.

The HR licensing unit TLILIC2016 requires that assessment must be undertaken using the mandatory assessment tool provided by the state/territory driver licensing authority. As these tools differ between jurisdictions, it is likely that a driver licensed in one jurisdiction will have not demonstrated the same set of competencies as a driver licensed in the neighbouring jurisdiction.

Route Approval

Regulators actively seek to address some of these issues through route assessment guidelines and approvals. Routes must therefore contain specific road infrastructure features. However, not all locations provide the opportunity for inclusion of the full range of desirable characteristics eg: highway merging; steep hills. Regulators have processes in place for approving exemptions to guidelines, although some are contemplating tightening this process and requiring assessments to be undertaken on compliant routes even if this involves some inconvenience to applicants and assessors.

However, route assessment guidelines, even when adhered to, do not provide exposure to the full range of weather and road conditions that may be experienced in real life driving.

6.5 Impacts of Outsourcing

It is not believed that many training providers set out to provide inadequate training. Rather, they seek to develop or retain market share and increase commercial profitability by skimping on the training and gaming the assessment system. Many driver training providers described the current marketplace as a ‘race to the bottom’ and believed that both the VET regulators and state/territory transport regulators are ‘missing in action’ from their oversight roles. This is forcing even the best of driver training providers to look for ways to shorten their courses, or even to pull out of the licensing part of the market, which is what a long standing and respected major player has done.

Following rising concern in many industries, a review conducted in 2015 by the Senate Standing Committee on Education and Employment concluded that:

\[
2.59 \text{ As businesses, private providers are primarily motivated by their own profitability. Correspondingly, provision of VET courses by for-profit providers is likely to be driven at the provider level by the desire to maximise margins by minimising the costs inherent to offering courses (Parliament of Australia, 2015).}
\]

It is acknowledged that transport regulators are increasingly looking to tighten their oversight and control of outsourced licensing providers. The commissioning of this work is in itself a proactive response to perceived issues.
Section 4 of this report discusses governance of outsourced providers. Many of the areas for consideration made in this report are intended to provide a balanced response to ensuring sound regulatory outcomes while enabling commercial providers to tailor and respond to consumer needs in a sustainable manner.

6.6 Key Themes and Findings

- The principle of training being based, not on time spent in a training course, but on development and assessment of competency is an important concept. However, the market based approach which does not mandate minimum training and practical experience durations is resulting a ‘race to the bottom’ in the current environment.

- It would be appropriate for licensing regulators to:
  - mandate minimum durations for theory and behind the wheel time to ensure a base level of quality of outsourced delivery
  - develop core national training and support material
  - develop standardised heavy vehicle driver trainer/assessor training in the National Heavy Vehicle Assessment Guide and consider options for building consistency in assessment across providers/assessors.

- A review of the National Heavy Vehicle Assessment Guide to assess the conditions/variables under which assessment occurs and inclusion of this requirements in the Licence to Drive units would be appropriate.
7. Austroads Next Steps

Austroads has agreed to establish a National Heavy Vehicle Driver Competency Framework Working Group to examine in detail the key themes and findings of the report and to identify and prioritise any further work for Austroads.
References


Coroners Court of Victoria, 2015. Submission No.70 to Senate Standing Committee on Rural and Regional Affairs and Transport: Aspects of Road Safety in Australia. Retrieved from https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Rural_and_Regional_Affairs_and_Transport/Road_safety/Submissions


NHVR, 2016. National Heavy Vehicle Registration Business Case November 2016. This document was utilised with the permission of the NHVR however is not publicly released.


UNSW Transport and Road Safety 2015, Submission No 50 to Senate Standing Committee on Rural and Regional Affairs and Transport: Aspects of Road Safety in Australia. Retrieved from https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Rural_and_Regional_Affairs_and_Transport/Road_safety/Submissions


Appendix A  National Heavy Vehicle Driver Competency Framework (2011)

The National Heavy Vehicle Driver Competency Framework was approved in March 2011 by the Standing Committee on Transport and is reproduced in Appendix A for information only. This is the version of the Framework reviewed by Austroads.

A.1  Introduction

This document sets out the parameters of the National Heavy Vehicle Driver Competency Framework.

A.1.1  Scope

- The set of training and competency assessment requirements that an applicant must satisfy for a Licensing Authority (LA) to deem the applicant competent to be issued with a heavy vehicle driver licence (HVDL); and
- The regulatory, policy and administrative arrangements to support the training and competency assessment process.

A.1.2  Application

This competency framework applies across all Australian jurisdictions to the training and competency assessment of all applicants for a HVDL of any class within the National Driver Licensing Scheme heavy vehicle (HV) hierarchy. (Currently: LR, MR, HR, HC & MC).

This encompasses the issue, reissue or renewal of a HVDL, the removal of a condition from a HVDL or the reassessment of a licensee or applicant for a HVDL.

The framework is designed to support the new National HVDL, delivered by a national HV regulator when that body commences operation. However, it is intended to be consistently implemented and applied, in the interim, within existing jurisdictional licensing systems. As a consequence, the proposed arrangements assume the need to implement at a jurisdictional level first.

At the time of writing, there is little information available about the structure and operations of the proposed national heavy vehicle regulator. The emphasis in this document, therefore, is on the policy settings of the competency framework rather than the regulatory and administrative arrangements that a new national regulator might adopt.

A.2  Regulation

A.2.1  Under a National Regulator

Provisions relating to the regulation of HV driver licensing, including the competency framework, will be included in the legislative package of the new national HV regulator.

Detailed drafting of the competency provisions must be coordinated and consistent with the rest of the legislative framework and can not be advanced until the design of the national HV regulator and its legislative framework is further advanced.
A.2.2 Interim Arrangement

In the interim, the competency framework is to be implemented within existing jurisdictional systems.

Each jurisdiction has its own legislative framework for HV driver licensing and each will be impacted differently. Each jurisdiction will require some regulatory changes to facilitate adoption of the new competency framework.

This implementation activity is the responsibility of each jurisdiction. However, the Heavy Vehicle Driver Competency Working Group (HVDCWG) is consulting with jurisdictions to ensure that they are informed at the earliest opportunity of the details of the new competency framework. This will enable jurisdictions to assess the regulatory implications for their jurisdiction and provide feedback to HVDCWG on significant regulatory issues. It will also enable jurisdictions to commence regulatory review processes as early as possible to facilitate timely implementation of the new competency framework within each jurisdiction.

HVDCWG will monitor the regulatory review progress of jurisdictions and report to the Registration & Licensing Task Force (RLTF).

A.3 Policy

A.3.1 Under a National Regulator

It is anticipated that the new national HV regulator will at some point in the future take responsibility for licensing policy including the competency framework.

The policy arrangements set out below for implementation under the interim arrangements will form a sound policy basis for the new national regulator. As far as practicable these arrangements have been designed to be suitable for adoption ‘as is’ by the new national regulator when it assumes responsibility for the competency framework.

A.3.2 Interim Arrangement

The following policy settings will apply to the interim arrangements for the National Heavy Vehicle Driver Competency Framework:

Eligibility Criteria

Each jurisdiction has a set of criteria which an applicant must meet before they may be issued with a HVDL; the “eligibility criteria”.

The current eligibility criteria are similar, but not always identical, across jurisdictions and variously include, but are not limited to, such matters as:

- age of the applicant
- driving experience in various licence classes
- medical conditions
- training/qualifications
- written or oral knowledge test
- practical driving assessment
- eye sight
- criminal/traffic history
The competency framework impacts on the eligibility criteria to the extent that it mandates the training and competency assessment requirements to be met for an applicant to be deemed as competent to be issued with a HVDL of a particular class.

The training and competency assessment requirements will form part of the eligibility criteria and be consistently applied across all Australian jurisdictions.

The training and competency assessment requirements detailed within this framework will be the only eligibility criteria applied by LAs pertaining to the assessment of the competency of an applicant for a HVDL.

The training and assessment requirements may take note of other eligibility criteria as they impact on the competency assessment process. For example, it may be a prerequisite for training and/or assessment that learners have already met other eligibility criteria such as minimum age, medical assessment or mandatory experience in lower licence classes.

Jurisdictions are committed to a process of harmonisation of eligibility requirements and any non-competency related areas identified through this process, where harmonisation might be desirable, will be referred through RLTF for the attention of jurisdictions.

**Competency**

Applicants for a HVDL are required to satisfy a range of eligibility criteria which include several factors such as medical fitness and licence tenure.

A key criterion is that the applicant must demonstrate competency to be issued with a HVDL.

Through the national Heavy Vehicle Driver Competency Framework, LAs will have a nationally consistent process and instrument for assessing the competency of licence applicants.

All current licence holders will continue to be deemed competent at time of renewal for the same licence class (subject to age based testing requirements).

**Integration into the VET System**

Within the VET system, development of industry training packages for the transport sector is the responsibility of the Transport & Logistics Industry Skills Council (TLISC).

Of the industry training packages administered by TLISC the appropriate training package for HV driver licensing is the Transport & Logistics Industry Training Package (TLI07).

This training package already contained Competency Units focusing on each of the 5 heavy vehicle driver licence classes. These Competency Units were originally developed to address industry requirements without consultation with LAs.

HVDCWG worked with TLISC to modify the existing Competency Units to reflect LA requirements. The modified Competency Units were then renamed and re-accredited as licensing units and allocated to new Skill Sets within the Transport & Logistics Industry Training Package to be used specifically for licensing purposes.

There is now a Skill Set within the Transport & Logistics Industry Training Package (TLI07) for each class of HVDL.
Complementary knowledge and skill elements required by industry have been segregated for inclusion in other Skill Sets or qualifications separate from the licensing units. This ensures that learner drivers completing the licensing units only need meet the licensing requirements of LAs and are not required to meet additional industry requirements which may not be relevant to their use of a HV (for example drivers of recreational vehicles).

The relevant licensing units are:

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>TLILIC1409A</td>
<td>Licence to Drive a Light Rigid Vehicle</td>
</tr>
<tr>
<td>TLILIC1509A</td>
<td>Licence to Drive a Medium Rigid Vehicle</td>
</tr>
<tr>
<td>TLILIC1609A</td>
<td>Licence to Drive a Heavy Rigid Vehicle</td>
</tr>
<tr>
<td>TLILIC1709A</td>
<td>Licence to Drive a Heavy Combination Vehicle</td>
</tr>
<tr>
<td>TLILIC1809A</td>
<td>Licence to Operate a Multi Combination Vehicle</td>
</tr>
</tbody>
</table>

**Competency Assessment**

Within the VET system competency assessment includes knowledge components but emphasises assessment through the practical demonstration of skills.

Competency assessment for HV driver licensing will include both knowledge and practical elements.

Competency will be assessed using the Units of Competency within the relevant Skill Sets from the Transport & Logistics Industry Training Package (TLI07). The assessment standard will be consistent across all approved assessment modes and across all jurisdictions.

Competency assessment will be subject to a Final Competency Assessment (FCA) in which the applicant will be required to demonstrate competency to undertake a broad range of the elements of the driving task in combination.

The FCA test will be conducted using a mandatory assessment instrument approved by the LA. The assessment instrument will meet or exceed VET system minimum requirements as they relate to competency based assessment.

The FCA test will include two distinct components:

- The first component will comprise a Knowledge Test.
- The second component may include a number of knowledge and practical elements including a practical driving test.

The first component must be passed before the second component may be attempted.

The Knowledge Test will be comprised of a series of questions taken from an agreed national common pool of questions. The details of the administration of the Knowledge Test will be set out in the Service Provider Deed in each jurisdiction.

The Mandatory Assessment Instrument will provide for competency to be assessed through either of two assessment approaches.

Where the applicant has undertaken a competency based training and assessment course, with the assessing organisation, and has been deemed fully competent through a formative assessment process, the competency of the applicant must be confirmed through a summative assessment process (the Final Competency Assessment) in accordance with the Mandatory Assessment Instrument. The on-road practical driving test component will be of at least 45 minutes duration.

In any other case, the applicant must pass a comprehensive summative assessment (the Competency Test) in accordance with the Mandatory Assessment Instrument. The on-road practical driving test component of the Competency Test may be in excess of 2 hours duration.
Competency Assessment Service Providers

The FCA will be administered directly by LAs or by Competency Assessment Service Providers approved by the LA.

Approved Competency Assessment Service Providers will include Commercial Service Providers (CSPs) which will be Registered Training Organisations (RTOs) operating within the VET system and offering their services on a commercial basis. CSPs will be the preferred channel for delivery of assessments.

LAs or approved non-RTO third party assessors (such as Police Officers) should deliver the assessment only where the preferred channel is not practicable; for example in remote areas or for drivers with special needs.

CSPs will be approved by LAs using a consistent national approach.

CSPs will be required to enter into an agreement, a Service Provider Deed (SPD), with the LA in each jurisdiction in which they operate. No LA will recognise assessments conducted by a CSP in a given jurisdiction until the CSP has established a SPD with the LA in that jurisdiction.

The performance of CSPs will be audited and monitored by the State Training Authority (STA) and the LA in each jurisdiction working cooperatively under the terms of a Memorandum of Understanding (MOU).

Assessment Options

A licence applicant may undertake assessment through any or a combination of:

- Integrated training and assessment
- An approved stand alone assessment test
- Recognition of prior learning/current competency through a process approved by the LA
- Special assessments, where approved by the LA, to enable the assessment of applicants with special needs or in exceptional circumstances (for example people with disabilities or in remote localities).

Assessments may be conducted in association with the delivery of HV driver training.

Where competency has been assessed by an approved assessor in any jurisdiction the assessment will also be recognised for the issuing of a HVDL in all jurisdictions.

Additional assessments may be conducted by and/or at the direction of LAs for the purpose of ensuring the probity and/or effectiveness of training and/or assessment service delivery or practice.

Recognition of Prior Learning/Current Competencies

Assessment options will include provision for recognition of prior learning/current competencies.

Applicants accessing this process will be subject to the same FCA as all other licence applicants.

---

3 Recognition of competency for licensing purposes will always be subject to the applicant being assessed as competent through a test approved by the LA which will require the applicant to demonstrate competency to undertake a broad range of the elements of the driving task in combination.
Transitional arrangements

There will be a transition period, from the commencement of the new competency framework in each jurisdiction. During the transition period applicants for a higher class of licence, who have already commenced learning at the beginning of the transition period, may demonstrate competency through the existing arrangements or under the new arrangements. Learner drivers who commence learning after the start date of the transition period must demonstrate competency through the new arrangements.

Commercial Service Providers

To deliver assessments under this framework a CSP must be an RTO with Scope of Registration for the relevant Competency Units and must hold a valid SPD with the LA in the jurisdiction in which it operates.

The CSP must deliver assessments in accordance with:

• the requirements of the VET system; and
• the provisions of the SPD.

A CSP must only allow persons to conduct assessments who are qualified to become Motor Driving Instructors (MDIs) of the relevant licence class, who hold the required assessor competency units, or recognised equivalent qualification, and hold a valid unrestricted driver licence for the relevant class.

Training of Assessors

Persons wishing to deliver assessments within this framework may be required by a LA to undertake mandatory training and assessment in the delivery of the assessment instrument.

Service Provider Deed

The SPD is an agreement between a CSP and a LA that sets out the obligations of the parties in regard to the approval and performance of the CSP to undertake assessments which the LA undertakes to recognise for licence issuing purposes. In particular, the SPD specifies the requirements that must be met by the CSP in order for certificates of competency issued by the CSP to be recognised by the LA.

The LA may, through the SPD, require the CSP to pay a fee to the LA on entering into the SPD, to cover administration costs of the scheme, and/or require the CSP to purchase materials specified by the LA to be used in the competency assessment and certification process.

Auditing and Control

All assessments must be conducted in accordance with the approved Assessment Standard.

Assessment providers that are RTOs will be subject to auditing and monitoring of assessments and related activities in accordance with the VET system auditing practices.

Additionally, all assessment providers will be subject to auditing and monitoring of assessments and related activities by auditors representing the LA.

Persons auditing in accordance with VET processes and persons auditing on behalf of the LA will conduct audits in compliance with the Auditing and Control Standard.

They may coordinate their auditing activities and/or work in cooperation to conduct individual or joint audits. They may share all information and reports in relation to their individual or joint auditing activities.
Training of Auditors

Persons wishing to conduct audits within this framework may be required by a LA to hold an approved qualification and/or to undertake mandatory training and assessment in the application of the approved Auditing and Control Standard.

Heavy Vehicle Driver Training Options

Applicants may develop competency through instruction by a MDI. Alternative or complementary means of developing competency may include, where permitted by the LA, experience under the direction of a supervising driver or by other means.

A MDI may deliver driver training independently or through an RTO or other training organisation.

There will be no requirement for a learner to obtain a Learner Licence before undertaking training or supervised experience in driving a heavy vehicle. However, at any time after an Australian driver licence is issued, the person to whom the licence has been issued may drive a motor vehicle for which a higher class of driver licence is required, if the higher class is one for which the person would next be eligible, and the driver is receiving tuition.

Driver training will not be prescribed for classes LR, MR or HR. For these classes an applicant need only demonstrate, through an approved assessment process, that they are competent to drive vehicles of the relevant class, to satisfy the competency criterion of the eligibility conditions. For class HC and MC, licence applicants, in some circumstances, may be required to demonstrate competence through an approved competency based training and assessment process.

Heavy Vehicle Driver Training Standards

The learner driver and the MDI or supervising driver must undertake driving instruction or practical driving experience consistent with the road rules in the jurisdiction.

Where training is provided by a CSP, such training must be nationally recognised training (through the VET system) addressing the Skill Set from the Transport & Logistics Industry Training Package relevant to the class of licence for which the learner driver is to be assessed.

The HVDCWG noted the significant change this will represent for several jurisdictions and, in particular, Tasmania.

Consideration was given to a proposal to set a compulsory minimum duration for training. It is noted that training will not be mandatory and that training within a competency based context must be sufficiently flexible to respond to the individual needs of learners who may come to the training from different starting points in terms of experience and competence. The HVDCWG considered that it would not be appropriate to set a minimum duration for training.

Consideration was given to a proposal for a mandatory learner log book for HV learner drivers. The HVDCWG noted that there will be no mandatory minimum on-road experience requirement or training period. In these circumstances it was determined that the imposition of a log book requirement is not warranted at this time.

Prerequisites for Heavy Vehicle Driver Training or Assessment

A CSP, before accepting payment or commencing any training or assessment process, must ensure that customers seeking training or assessment are aware of the eligibility criteria for obtaining a HVDL of the class being sought.
CSPs must obtain from the prospective customer acknowledgement that they understand and are able to satisfy eligibility criteria such as:

- Medical fitness to drive (including eyesight) as per the Austroads standard
- Meets experience criteria in relevant vehicle classes
- Currently holds a valid licence

These requirements will be harmonised across jurisdictions.

Heavy Vehicle Driver Training Service Providers

HV MDIs and supervising drivers must meet the eligibility requirements of the LA in the jurisdiction in which the training or supervised driving experience is being undertaken.

Eligibility requirements for MDIs and supervising drivers will be consistent across jurisdictions.

Recognition of Heavy Vehicle Driving Schools

Given that it is not proposed to mandate that learner drivers undertake organised training, or to regulate HV driver training, it is not meaningful to recognise organisations that only offer training without assessment.

However, all CSPs will offer assessment or a combination of training and assessment. They will be required to be RTOs within the VET system and to have Scope of Registration for one or more HV driver Skill Sets.

The registration processes of the VET system, linked to the service provider approval processes of the LAs, provide an adequate mechanism for the recognition of HV driving schools. The names of approved CSPs within a jurisdiction will be listed on the website of each LA for the information of applicants seeking assessment. More detailed information will be recorded on a national database for access by all LAs.

A.4 Administration

A.4.1 Under a National Regulator

Administration arrangements will be the responsibility of the national regulator when it is established. If an agency model is adopted by the national regulator, the competency framework may continue to be delivered through the following interim administration arrangements. If this option is adopted some further harmonisation of administrative arrangements across jurisdictions may be required.

A.4.2 Interim Arrangement

Ongoing Management of the Framework

Successful implementation and operation of the framework will require a commitment to ongoing maintenance and development of the system beyond the timeframe of the HVDCWG.

The HVDCWG proposes that RLTF assign a sub-committee prior to implementation of the framework. The sub-committee will include representation from all jurisdictions and will be charged with national oversight of implementation and sustaining the operation and development of the competency framework post implementation.

This sub-committee will also represent LAs, nationally, in dealings with third parties such as TLISC and be the source of nationally consistent expert advice to jurisdictions on the interpretation of policy in relation to the competency framework.
Implementation

The competency framework will be implemented by the LA in each jurisdiction.

As far as practicable LAs will deliver the competency framework through existing administration arrangements, modified as necessary to accommodate the changes.

Administration arrangements will vary considerably across jurisdictions in the first instance as they will be heavily influenced by current infrastructure and practices.

As far as practicable the variations between jurisdictions in administration arrangements will be confined to back of office systems and operations, and the experience of the applicant will be relatively consistent across jurisdictions.

HVDCWG is consulting with LAs to ensure that they receive early notice of the proposed competency framework to enable adequate planning for timely implementation.

Implementation Plans

Jurisdictions will develop implementation plans for submission to RLTF. These implementation plans will:

- indicate stages and timelines for implementation,
- highlight the details of any deviations from the agreed national model,
- indicate measures and timelines for resolving any deviations from the agreed national model.

HVDCWG will provide a template for jurisdictions to facilitate consistency in jurisdictional implementation plans.

Policy Advice

Each LA will be responsible for providing policy advice on the competency framework to clients in their jurisdiction.

Any difficulties in interpreting policy should be referred to the sub-committee for clarification or resolution.

Each LA will be responsible for providing technical advice to the STA on LA requirements and on applications from prospective service providers for Scope of Registration.

Licence Issuing

For most jurisdictions there will be minimal impact on the current licence issuing administration processes. Some systems and business processes may need to be modified to provide for the validation and acceptance of certificates of competency from a wider range of assessment service providers.

Approval of Assessment Service Providers

LAs will need to develop administration systems and processes for the approval of CSPs. This will require significant changes in most jurisdictions.

HVDCWG will develop a model for use by LAs. While the different administration arrangements of LAs will require some customisation of the model this approach should ensure a high degree of consistency across jurisdictions.

Auditing Practices

LAs will need to develop administration systems and processes for the auditing and monitoring of assessment providers.
HVDCWG will develop a model for use by LAs. While the different administration arrangements of LAs will require some customisation of the model this approach should ensure a high degree of consistency across jurisdictions.

**National Database**

A national database will be established and maintained listing approved assessors and related information for access by all LAs.

A host jurisdiction must be identified to establish and maintain this database. HVDCWG will follow up on this.

**Training of Approved Persons**

HVDCWG will develop a training course, if this proves desirable, for LAs to train auditors in the use of the audit tool.

### A.5 Acronyms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>ATC</td>
<td>Australian Transport Council</td>
</tr>
<tr>
<td>CSP</td>
<td>Commercial Service Provider</td>
</tr>
<tr>
<td>FCA</td>
<td>Final Competency Assessment</td>
</tr>
<tr>
<td>HV</td>
<td>Heavy Vehicle</td>
</tr>
<tr>
<td>HVDCWG</td>
<td>Heavy Vehicle Driver Competency Working Group</td>
</tr>
<tr>
<td>HVDL</td>
<td>Heavy Vehicle Driver Licence</td>
</tr>
<tr>
<td>HVSC</td>
<td>Heavy Vehicle Steering Committee</td>
</tr>
<tr>
<td>LA</td>
<td>Licensing Authority</td>
</tr>
<tr>
<td>MDI</td>
<td>Motor Driving Instructor</td>
</tr>
<tr>
<td>MOU</td>
<td>Memorandum of Understanding</td>
</tr>
<tr>
<td>RLTTF</td>
<td>Registration &amp; Licensing Task Force (Austroads)</td>
</tr>
<tr>
<td>RTO</td>
<td>Registered Training Organisation</td>
</tr>
<tr>
<td>SPD</td>
<td>Service Provider Deed</td>
</tr>
<tr>
<td>STA</td>
<td>State Training Authority</td>
</tr>
<tr>
<td>TLISC</td>
<td>Transport &amp; Logistics Industry Skills Council</td>
</tr>
<tr>
<td>VET</td>
<td>Vocational Education &amp; Training System</td>
</tr>
</tbody>
</table>

### A.6 Definitions

<table>
<thead>
<tr>
<th>Word</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant</td>
<td>Anyone seeking to be issued with a HVDL.</td>
</tr>
<tr>
<td>Audits</td>
<td>Unless otherwise stated includes all auditing, monitoring and reporting activities including programmed, ad hoc or targeted audits.</td>
</tr>
<tr>
<td>Commercial Service Provider</td>
<td>An organisation approved by a LA to operate on a commercial basis as a Competency Assessment Service Provider.</td>
</tr>
<tr>
<td>Word</td>
<td>Definition</td>
</tr>
<tr>
<td>------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| Competency                               | A person is considered to be competent when they are able to apply their knowledge and skills to successfully complete an activity, in a range of situations and environments, to a defined standard of performance.  
1. Competency commonly encompasses several dimensions which may include but are not limited to:  
2. Undertaking specific tasks or sub-tasks (such as uncoupling a trailer, reversing a vehicle or changing gears).  
3. Managing a number of different tasks or sub-tasks concurrently or sequentially to complete a broader task such as driving from A to B. (for example: restraining a load, perceiving and avoiding hazards, following approved routes and observing road rules).  
4. Responding to problems and irregularities while undertaking a task.  
5. Non-task specific skills such as behaving temperately and interacting courteously with other road users. |
<p>| Competency Assessment                    | Competency Assessment is the process of gathering and weighing the evidence as to whether a person is competent to undertake a particular task.                                                               |
| Competency Assessment Service Provider   | Organisation that the LA has approved to undertake competency assessments that will be recognised for HV driver licensing purposes. This may be a CSP, Police Service, the LA itself or any other organisation approved by the LA.                     |
| Competency Standard                      | A Competency Standard describes the knowledge and skills a person must have to be able to perform a task to the required standard. It expresses these elements in terms of the evidence that may be gathered in order to determine if a task is being performed competently. |
| Competency Unit                          | Competency Standards which have been formally defined for use in training courses within the VET System are often referred to as Units of Competency (or Competency Units).                       |
| Final Competency Assessment              | A test designed to demonstrate competency to undertake a broad range of the elements of the driving task in combination.                                                                                     |
| Heavy Vehicle                            | Vehicle of class LR, MR, HR, HC or MC.                                                                                                                                                                     |
| Heavy Vehicle Driver                     | A committee of LA representatives assigned by RLTF to develop the heavy vehicle driver competency framework.                                                                                               |
| Competency Working Group                 |                                                                                                                                                                                                          |
| Issue (of a licence)                     | Unless otherwise stated refers to the issue, reissue or renewal of a heavy vehicle driver licence. May also apply where the context allows to the re-assessment of a licensee (or applicant) or to the removal of a condition on a licence. |
| Licensing Authority                      | Regulatory Authority responsible for issuing HV licences in a given jurisdiction.                                                                                                                              |
| Motor Driving Instructor                  | A person who holds (and has held for at least 12 months) the relevant class of licence, and who holds a Certificate IV in Heavy Vehicle Driving Instruction (TLI41309) and who holds accreditation to deliver motor driving instruction for fee or benefit in the relevant jurisdiction. |
| Registered Training Organisation         | A training and/or assessment service provider registered by a State Training Authority to deliver services and issue qualifications within the VET system.                                                |
| Relevant class                           | The class of heavy vehicle for which the licence applicant is being assessed.                                                                                                                              |
| Service Provider Deed                    | An agreement between a CSP and a LA.                                                                                                                                                                        |
| Skill Set                                | A set of one or more Competency Units which are recognised as covering the range of skills required to competently perform a defined task.                                                              |</p>
<table>
<thead>
<tr>
<th>Word</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supervised driving experience</td>
<td>Driving experience undertaken by a learner driver, under the direct supervision of a suitably qualified driver, for the purposes of developing competency to upgrade to a higher class of driver licence.</td>
</tr>
<tr>
<td>Training</td>
<td>Refers to training delivered by an accredited Motor Driving Instructor (does not include supervised driving experience).</td>
</tr>
<tr>
<td>Unit of Competency</td>
<td>Competency Standards which have been formally defined for use in training courses within the VET System are often referred to as Units of Competency (or Competency Units).</td>
</tr>
</tbody>
</table>
| Valid unrestricted licence         | A licence to drive the relevant class of vehicle which:  
• has been held for the requisite time; and  
• is without restriction; and  
• is current; and  
• is not under suspension or cancellation; and  
• is not a Learner Licence or Provisional Licence |

The National Heavy Vehicle Driver Assessment Guide was approved by the Standing Committee on Transport and is reproduced in Appendix B for information only. This is the version of the Guide reviewed by Austroads.

B.1  Background

The Australian Transport Council's national action plan has proposed a series of national reforms intended to “achieve a national transport system that is safe, secure, efficient, competitive, integrated, sustainable and reliable and which supports and enhances national, social, environmental and economic prosperity”.

The Transport Ministers agreed at their meeting on 25 July 2008 that heavy vehicle reforms should deliver a consistent approach to minimum standards for competency assessment for heavy vehicle driver licences and the recognition of Registered Training Organisations delivering heavy vehicle driver training and assessment.

Under the sponsorship of the Registration and Licensing Task Force of Austroads a project team called the National Heavy Vehicle Driver Competency Working Group (NHVDCWG) was established to develop the National Heavy Vehicle Driver Competency Framework. The Framework which includes uniform licensing criteria will be implemented by the States and Territories. At a future date the uniform system of heavy vehicle licensing may be handed to the National Heavy Vehicle Regulator.

In March 2011, the Standing Committee on Transport endorsed the National Heavy Vehicle Driver Competency Framework. The framework establishes nationally consistent minimum competency standards for heavy vehicle drivers. The framework also envisages that the testing of heavy vehicle drivers for licensing purposes will be conducted by private organisations.

The competency framework applies across all Australian jurisdictions to the training and competency assessment of all applicants for a Heavy Vehicle Driver Licence (HVDL) of any class within the National Driver Licensing Scheme heavy vehicle (HV) hierarchy. This encompasses the issue, reissue or renewal of a HVDL, the removal of a condition from a HVDL or the reassessment of a licensee or applicant for a HVDL.

In constructing the National Heavy Vehicle Driver Competency Framework a part of the work undertaken by the NHVDCWG was to develop national heavy vehicle licensing competency units for the Transport and Logistics Training Package. These units reflect the heavy vehicle classes in the National Driver Licence Classification System and users must ensure that they have access to the current edition/version of the units, as they are live documents subject to regular alteration. The following is a list of the Competency Unit names – codes have been deliberately omitted so as to avoid confusion.

B.1.1  Competency Unit

- Licence to drive multi-combination vehicle
- Licence to drive heavy combination vehicle
- Licence to drive heavy rigid vehicle
- Licence to drive medium rigid vehicle
- Licence to drive light rigid vehicle
Furthermore the working group developed a national Final Competency Assessment (FCA) and a Competency Test (CT) which is supported by this Assessment Guide.

B.1.2 Aim of the Guide

The purpose of this Assessment Guide is two fold:

1. To serve as a support resource that will ensure that the delivery of the FCA & CT meets the assessment standards of the Licensing Authorities.
2. To assist assessors to determine whether a applicant can safely and competently operate a heavy vehicle with a load on public roads with regard to the public and other road users. As such it contains details of the assessment conditions and descriptors to satisfy competency in each of the assessment criteria.

To achieve the above Assessors must have the following:-

- Thorough knowledge of the road rules, regulations and principles that underpin the safe and competent operation of a heavy vehicle on the public road system.
- Complete understanding of the content and process within this guide.
- Assessment skills and experience.
- Qualifications as required by the regulators of registered training organisations.
- Additional qualifications as required by the Licensing Authority.

B.1.3 The Final Competency Assessment (FCA)

The Final Competency Assessment is designed to assess those Licence applicants who have progressed through a quality training regime to obtain their competence and if successful, their Heavy Vehicle Licence.

B.1.4 The Competency Test (CT)

The Competency Test is designed to assess Heavy Vehicle Licence applicants who elect to attempt a "test only" entry into heavy vehicle driving, however applicants must demonstrate the entire list of tasks and criteria under the CT guidelines on the one occasion. The CT can only be conducted on those applicants who are attempting a “rigid” vehicle licence – the CT does not apply to applicants attempting to gain a Heavy or Multi Combination vehicle licence except under exceptional circumstances. Approval for applicants to sit a Competency Test for a HC or MC licence must be gained through the Licensing Authority.

B.1.5 The Knowledge Test

The Knowledge Test must be passed once for the rigid vehicle requirements and once for the articulated vehicle requirements. These tests can be sourced separately from the Licensing Authority in each jurisdiction.

The knowledge test must be passed before the applicant is permitted to commence the Competency Test or the Final Competency Assessment.

B.1.6 Successful Completion

To be deemed competent in each of the heavy vehicle licensing requirements each applicant must not only satisfy the requirements of the FCA or the CT (whichever is applicable) but also pass the relevant heavy vehicle knowledge test.
Once all requirements for the FCA or CT have been successfully completed a Certificate of Competence (CoC) or a Heavy Vehicle Driver Licence may be issued.

B.2 The Criteria (15)

Section A: Pre-drive

Criteria 1 Pre-operational Check
Criteria 2 Cabin Drill

Section B: Vehicle Control and Operation

Criteria 3 Start, move off, shut down and secure
Criteria 4 Manages Steering
Criteria 5 Manages Gears
Criteria 6 Manages Brakes
Criteria 7 Manages Accelerator

Section C: Low Risk Driving Behaviours

Criteria 8 Create & Maintain Crash Avoidance Space
Criteria 9 Protect Crash Avoidance Space

Section D: Compliance

Criteria 10 Road Rules and Directions

Section E: Additional Risk Management

Criteria 11 Reverse
Criteria 12 Hill Stop/Start
Criteria 13 Load Securing
Criteria 14 Coupling/Uncoupling
Criteria 15 Bus Stop Procedure

B.3 Assessment Process

The FCA and CT employ both “one off” and “continuous” assessment methodologies.

A “one off” assessment is employed where competency can be determined in a single event.

“Continuous” assessment however, is employed where it is considered that safe and competent operation of the heavy vehicle requires the applicant to demonstrate certain skills and behaviors either more than once, or continuously throughout the assessment. This means that (where practical and applicable) the applicant will be continuously assessed on the relevant criteria for the duration of the assessment.

Details of the requirements to satisfy each task and Criteria are provided in this Assessment Guide.
B.4 Content of the FCA/CT

Both the FCA and the CT have theory assessments divided into Rigid and Combination vehicle groups. That means that an applicant must sit and pass the Rigid Knowledge test once when attempting to enter the rigid vehicle class and the Combination Knowledge test once when attempting to enter the Combination Vehicle class.

The FCA and CT also have off-road and on-road practical assessments consisting of up to 15 criteria relevant to the type of vehicle class being sort. All the relevant criteria must be passed before a licence would be granted. These practical components can be undertaken in any order.

B.4.1 Off-road criteria

Section A – Pre-drive
Criteria 1 – Pre-operational check
Criteria 2 – Cabin Drill

Section E – Additional Risk Management
Criteria 11 – Reverse (can also be conducted on-road where approved by the Licensing Authority)
Criteria 13 – Load Securing
Criteria 14 – Coupling/uncoupling

Individual Licensing Authorities will determine where all criteria assessments can be conducted.

B.4.2 On-road Criteria

Section B – Vehicle Control & Operation
Criteria 3 – Start, Move off, shut down & secure
Criteria 4 – Manages Steering
Criteria 5 – Manages Gears
Criteria 6 – Manages Brakes
Criteria 7 – Manages Accelerator

Section C – Low Risk Driving Behaviours
Criteria 8 - Create & Maintain Crash Avoidance Space (CAS)
Criteria 9 – Protect Crash Avoidance Space (PCAS)

Section D – Compliance
Criteria 10 - Road Rules & Directions

Section E – Additional Risk Management
Criteria 11 – Reverse (can also be conducted off-road where approved by the Licensing Authority)
Criteria 12 – Hill Stop/start
Criteria 15 – Bus Stop Procedure
B.5 Range Statement criteria for the On Road component of the FCA

A continuous on road drive assessment with a minimum duration of 45 minutes (plus 10 minutes for Rigid and 20 minutes for Combinations for the Reversing assessments when conducted during the on-road component) must incorporate the items listed below:

1. All items listed in Section B, C, D and Criteria 12 (Hill Stop/Start) and Criteria 15 (Bus Stop Procedure) from Section E if applicable as follows:
   - Section B – Criteria 3, 4, 5, 6 & 7.
   - Section C – Criteria 8 & 9.
   - Section D – Criteria 10.
   - Section E – Criteria 12 (if available) & Criteria 15 (if applicable).

2. Road and traffic conditions which include medium to heavy traffic.

3. A laden vehicle (refer to the Heavy Vehicle Assessment Guide, Vehicle and Load Requirements). The vehicle must be laden for the duration of the on road drive.

4. An assessment route developed by the approved provider and approved by the Licensing Authority which allows for a comprehensive test covering all relevant items listed below in Table B2: FCA On-road requirements.

5. A route that includes a sufficient degree of gradient to allow for a comprehensive test of gear changing and the hill stop/start. In locations where a suitable gradient is not available the Licensing Authority may agree to substitute items proposed by the provider.

<table>
<thead>
<tr>
<th>Table B1: FCA contents (LR to MC inclusive)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reference</td>
</tr>
<tr>
<td>-----------</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Knowledge Test</td>
</tr>
<tr>
<td>Section A – Pre-drive</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Section B – Vehicle Control &amp; Operation</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Section C – Low Risk Driving Behaviours</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Section D – Compliance</td>
</tr>
<tr>
<td>Section E – Additional Risk Management</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

Austroads 2018 | page 65
### Table B 2: FCA On-road requirements

**Test route - minimum task requirements**

<table>
<thead>
<tr>
<th>Element</th>
<th>No. of Left turns</th>
<th>No. of Right turns</th>
<th>No. of Straight ahead</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single turn lanes</td>
<td>4</td>
<td>4</td>
<td>1</td>
</tr>
<tr>
<td>(Single turn lane to single lane)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Multi turn lanes</td>
<td>2</td>
<td>2</td>
<td>-</td>
</tr>
<tr>
<td>(Multi turn lane to multi lane)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Onto Multi turn lanes</td>
<td>3</td>
<td>3</td>
<td>-</td>
</tr>
<tr>
<td>(Single turn lane to multi lane)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Roundabouts (must be appropriately sized)</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Lane changes</td>
<td>2</td>
<td>2</td>
<td>-</td>
</tr>
<tr>
<td>Merge – 2 lanes merging into 1 lane</td>
<td>-</td>
<td>-</td>
<td>1</td>
</tr>
<tr>
<td>Turning right across traffic (not at traffic lights)</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Straight drives – multi and/or single lane roads of at least 500 metres in length (If required by jurisdiction)</td>
<td>-</td>
<td>2</td>
<td>-</td>
</tr>
<tr>
<td>Totals</td>
<td>12</td>
<td>14</td>
<td>7</td>
</tr>
</tbody>
</table>

### B.6 Intersection Hierarchy:

Route designers must use the following hierarchy at intersections:

<table>
<thead>
<tr>
<th>Control item</th>
<th>Intersection type</th>
</tr>
</thead>
<tbody>
<tr>
<td>1st Traffic lights</td>
<td>1st Crossroads</td>
</tr>
<tr>
<td>2nd Stop Sign</td>
<td>2nd T intersections</td>
</tr>
<tr>
<td>3rd Give way Sign</td>
<td>3rd Roundabouts</td>
</tr>
<tr>
<td>4th Uncontrolled (no signs)</td>
<td></td>
</tr>
</tbody>
</table>

*Note: If any of the listed items such as traffic lights, intersections or roundabouts are not available at the testing location, the provider must make a formal submission to the Licensing Authority for approval to substitute other items from one or more of the other assessment tasks.*

### B.7 Range Statement Criteria for the on Road component of the CT

A continuous on road drive assessment with a minimum duration of 90 minutes (plus 10 minutes for Rigids for the Reversing competencies when conducted during the on-road component) must incorporate the items listed below:-

1. All Criteria in Sections A, B, C, & D listed in the guide and Criteria 15 of Section E (Bus Stop Procedure) if applicable as follows:
   - Section A – Criteria 1 & 2.
   - Section B – Criteria 3, 4, 5, 6 & 7.
   - Section C – Criteria 8 & 9.
   - Section D – Criteria 10.
   - Section E – Criteria 12 (if available) & Criteria 15 (if applicable).

2. Additional time must be allocated to ensure assessment of the remaining Criteria from Section E, Criteria 11 & 13 – Refer Table B3: CT requirements.
3. Road and traffic conditions which include medium to heavy traffic. The definition of medium to high traffic means that there is at least a 70% chance of the vehicle interacting with another vehicle or road user.

4. A laden vehicle (refer to the Heavy Vehicle Assessment Guide, Vehicle and Load Requirements). The vehicle must be laden for the duration of the on road drive.

5. A route developed by the approved provider and approved by the Licensing Authority which allows for a comprehensive test covering all relevant items listed below in Table B4: CT On-road requirements.

6. A route that includes a sufficient degree of gradient to allow for a comprehensive test of gear changing and the hill stop/start. In locations where a suitable gradient is not available the Licensing Authority may agree to substitute items proposed by the provider.

### Table B 3: CT requirements (LR – HR only)

<table>
<thead>
<tr>
<th>Reference</th>
<th>Criteria</th>
<th>Description</th>
<th>Duration (approx. minutes)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Knowledge test</td>
<td>-</td>
<td>Knowledge test relevant to vehicle class Must be successfully completed before conducting CT</td>
<td>30</td>
</tr>
<tr>
<td>Section A – Pre-drive</td>
<td>Criteria 1</td>
<td>Pre-operational Check</td>
<td>10</td>
</tr>
<tr>
<td></td>
<td>Criteria 2</td>
<td>Cabin Drill</td>
<td>5</td>
</tr>
<tr>
<td>Section B – Vehicle Control &amp; Operation</td>
<td>Criteria 3</td>
<td>Start, move off, shut down and secure</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Criteria 4</td>
<td>Manages Steering</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Criteria 5</td>
<td>Manages Gears</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Criteria 6</td>
<td>Manages Brakes</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Criteria 7</td>
<td>Manages Accelerator</td>
<td>90</td>
</tr>
<tr>
<td>Section C – Low Risk Driving Behaviours</td>
<td>Criteria 8</td>
<td>Create &amp; maintain Crash Avoidance Space</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Criteria 9</td>
<td>Protect Crash Avoidance Space</td>
<td></td>
</tr>
<tr>
<td>Section D – Compliance</td>
<td>Criteria 10</td>
<td>Road Rules and Directions</td>
<td></td>
</tr>
<tr>
<td>Section E – Additional Risk Management</td>
<td>Criteria 11</td>
<td>Reverse</td>
<td>10</td>
</tr>
<tr>
<td></td>
<td>Criteria 12</td>
<td>Hill Stop/Start</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Criteria 13</td>
<td>Load Securing</td>
<td>20</td>
</tr>
<tr>
<td></td>
<td>Criteria 14</td>
<td>Coupling/uncoupling</td>
<td>NA for a CT</td>
</tr>
<tr>
<td></td>
<td>Criteria 15</td>
<td>Bus Stop procedure</td>
<td></td>
</tr>
</tbody>
</table>

### Table B 4: CT On-road requirements

*Test route – minimum task requirements*

<table>
<thead>
<tr>
<th>Element</th>
<th>No. of Left turns</th>
<th>No. of Right turns</th>
<th>No. of Straight ahead</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single turn lanes</td>
<td>8</td>
<td>8</td>
<td>2</td>
</tr>
<tr>
<td>(Single turn lane to single lane)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Multi turn lanes</td>
<td>4</td>
<td>4</td>
<td>-</td>
</tr>
<tr>
<td>(Multi turn lane to multi lane)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Onto Multi turn lanes</td>
<td>6</td>
<td>6</td>
<td>-</td>
</tr>
<tr>
<td>(Single turn lane to multi lane)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Roundabouts (must be appropriately sized)</td>
<td>2</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Lane changes</td>
<td>4</td>
<td>4</td>
<td>-</td>
</tr>
<tr>
<td>Merge – 2 lanes merging into 1 lane</td>
<td>-</td>
<td>-</td>
<td>2</td>
</tr>
<tr>
<td>Turning right across traffic (not at traffic lights)</td>
<td>-</td>
<td>4</td>
<td>-</td>
</tr>
</tbody>
</table>
Element | No. of Left turns | No. of Right turns | No. of Straight ahead
--- | --- | --- | ---
Straight drives – multi and/or single lane roads of at least 500 metres in length *(If required by jurisdiction)* | 24 | 28 | 12
Totals

B.7.1 Intersection Hierarchy:

Route designers must use the following hierarchy at intersections:

<table>
<thead>
<tr>
<th>Control item</th>
<th>Intersection type</th>
</tr>
</thead>
<tbody>
<tr>
<td>1st Traffic lights</td>
<td>1st Crossroads</td>
</tr>
<tr>
<td>2nd Stop Sign</td>
<td>2nd T intersections</td>
</tr>
<tr>
<td>3rd Give way Sign</td>
<td>3rd Roundabouts</td>
</tr>
<tr>
<td>4th Uncontrolled (no signs)</td>
<td></td>
</tr>
</tbody>
</table>

Note: If any of the listed items such as traffic lights, intersections or roundabouts are not available at the testing location, the provider must make a formal application to the Licensing Authority for approval to substitute other items from one or more of the other assessment tasks.

B.7.2 Failure Protocol

Where a CT applicant fails the test, the applicant can elect to move to either another CT or an FCA process. However, any booking of a re-assessment must be undertaken within the Licensing Authority’s guidelines. A CT applicant who fails the test cannot continue to drive the vehicle during the same time slot and undertake an FCA during this period.

Only applicants undertaking a training and assessment program for a rigid vehicle may at any time choose to undertake a CT rather than continuing with the training and assessment process.

If an applicant fails the on-road assessment for either an FCA or a CT, a full on-road re-assessment must be undertaken. Off-road tasks successfully undertaken will continue to be valid for up to 12 months from the date of completion.

B.8 Assessment Criteria

- Successful completion of the FCA/CT requires the applicant to pass **ALL Criteria as listed** in this FCA/CT Assessment Guide. Each Criterion is assessed according to its requirements. Some errors however, are permitted in the test criteria.

- **No more than 2 errors are allowed in Section A** with the exception of failing to fit their seatbelt which is an immediate failure.

- No more than 4 errors are allowed in Section B.

- No more than 2 errors are allowed in Section C.

- No error is allowed in Section D. Any error recorded in Criteria 10, Section D will result in test termination.

- No more than 1 error is allowed in Section E.
B.9 Assessor Guidelines for Determining Competence

While it is possible to accrue some errors in sections A, B & C, the assessor should take the following into consideration:

- Was safety compromised?
- Did the driver remain in control?
- Has the action/inaction of the driver impacted on other road users?
- Was safety kept as a high priority in dealing with the mistake/adverse situation? In Sections D & E it is important for the assessor to consider whether:
  - safety has been compromised
  - other road users have had to take evasive action or
  - the assessor has intervened physically or verbally.

Before determining whether an immediate test termination should be applied please note the following:

N.B Professional judgment involves an assessor making decisions about competence based on:

- Evidence gathered
- Interpretation and understanding of the Criteria
- Breadth and depth of experience working with the standards
- Thorough understanding of industry practice

The assessor must deliver the full FCA or CT and advise the applicant of the outcome only at the completion of the assessment. The exception to this is where the assessment is terminated.

B.10 Access & Equity

This assessment tool is being used nationally by both Licensing Authorities and Approved Providers. Consequently, assessment will be undertaken in a diverse range of road and traffic environments and in a large number of test locations. It is likely that some assessment tasks may be difficult to assess in some locations (e.g. hill start in very flat terrain).

In such circumstances flexible approaches to the test may need to be negotiated with the Licensing Authority. These must comply with the assessment guidelines of regulators of registered training organisations and meet the Licensing Authority's audit requirements. Road safety must not be compromised.

B.11 Non commencement or Termination of test

The FCA/CT will not commence, or will be terminated if any of the following occur:-

1. If the applicant has not successfully undertaken the appropriate Knowledge Test for the relevant Heavy Vehicle licence category.
2. The test vehicle is unregistered, unroadworthy, breaks down or is involved in a crash.
3. The applicant does not present a licence and/or has not met the Licensing Authority's eligibility requirements.
4. The applicant does not adhere to OH&S requirements.
5. The applicant offers the assessor a bribe.
6. The assessor deems that continuing the test poses an unacceptable threat to the safety of the applicant, assessor or other road users. This includes but is not limited to the:
   a. Applicant appears to be affected by alcohol or any other drug
   b. Applicant intimidates or threatens the assessor
   c. Applicant drives in a dangerous manner or is unable to control the vehicle
   d. Assessor intervenes to take control or gives direction to control the vehicle
   e. Assessor is unable to establish appropriate communication
   f. The applicant disobeys directions given by the assessor.

7. The applicant does not follow directions given by Police or other authorised persons.

B.12 Vehicle and Load Requirements

B.12.1 Vehicle requirements

The vehicle used for a CT or FCA must be the correct type and configuration for the class of Licence for which the applicant is applying and Licensing Authority approved by the relevant Authority as detailed below. It must be registered, roadworthy and comprehensively insured. Any vehicle fitted with a manual gear box, but having its gears changed by robotic or computerized systems, is regarded as an automatic vehicle.

B.12.2 Multi-combination (MC)

- A Heavy Combination vehicle with more than one trailer. The vehicle must be B- Double rated and have all the pertinent documentation, permits etc. The combination must be at least 22 metres in length, in B-double configuration.
- The minimum vehicle type for an MC is a 3 axle prime mover with an A and B trailer each with bogie axles.

B.12.3 Heavy Combination (HC)

- A vehicle consisting of a prime mover and a semi-trailer. The prime mover must have a minimum of three axles and the semi-trailer a minimum of two axles. The vehicle must have a GCM rating of at least 24 tonnes; or
- A Heavy Rigid vehicle which is towing a trailer. The trailer must have at least two axles and a GVM of 12 tonnes or more.

B.12.4 Heavy Rigid (HR)

- A rigid vehicle, not being an unladen prime mover, with a minimum of three axles and a minimum 15 tonnes GVM; or
- A modified 3 axle prime mover with a certified detachable tray (with the capacity to carry 75% of its specified GVM) with a minimum GVM of 15 tonnes, or
- A Three axle articulated bus (refer “Use of Buses, Coaches and Motor Homes”); or
- A Three axle bus above 15 tonnes GVM (refer “Use of Buses, Coaches and Motor Homes”).

B.12.5 Medium Rigid (MR)

- A Two axle rigid truck, not being a prime mover, above 8 tonnes GVM; or
- A Two axle bus above 8 tonnes GVM (refer “Use of Buses, Coaches and Motor Homes”).
B.12.6 Light Rigid (LR)

- A Rigid truck above 4.5 tonnes GVM but less than or equal to 8 tonnes GVM; or
- A Rigid bus with less than or equal to 8 tonnes GVM or seats more than 12 adults, including the driver (refer “Use of Buses, Coaches and Motor Homes”).

B.12.7 Use of Buses, Coaches and Motor Homes

Buses or motor homes will only be approved as vehicles to be used in a CT or FCA in special circumstances as determined by the Licensing Authority. In such circumstances these vehicles are exempt from carrying a load. Assessments must not be conducted in these vehicles when carrying passengers, with the exception of the Licensing Authority’s auditor(s).

Most vehicles will be suitable for on road tests, however some have restrictions placed on them as follows and cannot be used for Licence testing:

- **Special Purpose Vehicles** (except emergency service vehicles) Cranes, specialised road working vehicles and farm machinery
- **Federal Interstate Registered Vehicles**
  These vehicles may only be used if a special permit has been supplied by the relevant transport authority
- **Livestock Transport Vehicles**
  If the load is livestock
- **Vehicles Carrying a Placard of Dangerous Goods**
- **Buses, Coaches and Motor Homes**
  Buses or motor homes will only be approved as vehicles to be used in a CT or FCA in special circumstances as determined by the Licensing Authority. In such circumstances these vehicles are exempt from carrying a load. Assessments must not be conducted in these vehicles when carrying passengers, with the exception of the Licensing Authority’s auditor(s).
- **Armoured Vehicles**
- **Dual Control Vehicles**
- **Vehicles Displaying Trade Plates**

B.13 Assessment in a loaded vehicle

To check an applicant’s ability to drive a loaded heavy vehicle some tasks, specifically the on-road drive tasks, require the vehicle to be loaded. All loads must be positioned and secured in compliance with National Transport Commission General Principles of Load Restraint Standards.

The loaded vehicle must have a mass which is at least 75% of the maximum mass allowable for the vehicle to be driven on public roads. This is at least 75% of either the “Legal Mass Limit”, Gross Vehicle Mass (GVM) for rigid vehicles or Gross Combination Mass (GCM), for articulated or heavy trailer combinations. The vehicle must be able to maintain adequate road speed.

Unless otherwise approved by the Licensing Authority, the vehicle supplied by the provider must have suitable seating. A minimum of 3 seats, unless exempt by

Licensing Authority, must be provided to accommodate the driver, assessor and auditor. During audit the assessor is required to sit adjacent to the applicant unless vehicle configuration restricts this or safety would be compromised.
If the applicant is being assessed in their own vehicle, it is the applicant’s responsibility to check the load requirements beforehand and be prepared to provide documented evidence such as a weighbridge ticket that was issued within the past 24 hours.

**B.14 Section A: Pre-drive**

**B.14.1 Criteria 1 Pre-operational Check**

**Performance**
Locate, identify, inspect and/or describe reasons for inspection and the required condition of vehicle components for a pre-operational check.

**Conditions**
Vehicle parked and secured in a non-traffic area with safe pedestrian access to all sides of the vehicle.

Engine not running.

**Requirements**
One off test.

**Assessment duration**
10 minutes Rigid Vehicles – 15 minutes HC & MC

**Note:** Where a component is not accessible the applicant is to give a commentary description. The Assessor may seek further clarification to assess understanding.

**Test Criteria**

1.1 **Tyres, wheels & wheel nuts**

The applicant must check and describe the following items:-

- **Rims:**
  - no dents in flanges, cracks, or damage to rim assembly
- **Tyres:**
  - minimum 1.5mm tread depth, no cuts or damage, dual tyres not touching, no rocks lodged between duals, correct inflation (visible check required unless the applicant suspects incorrect inflation)
- **Spare Wheel(s) / tyre(s):**
  - location, condition and inflation
- **Wheel Nuts:**
  - all present and undamaged, no loose lugs or nuts, no visible rust trails.

1.2 **Vehicle measurements**

The applicant must state:-

- Vehicle or load height (whichever is the greater).
- Vehicle length (the length must be known when crossing a railway crossing which has limited space to fit on the other side).
- Vehicle Weight (GVM/GCM)
1.3 Fluid leaks/levels (comply with all OHS&W requirements)

The applicant must check all relevant accessible fluid levels.

1.4 Air leaks

The applicant must:

- Listen. If the location is noisy the applicant may describe this action.

1.5 Air tanks

The applicant must:

- Drain valves, as required.

1.6 Couplings (does not apply to Rigid Vehicles unless attempting a Truck/Trailer combination assessment)

The applicant must check:

- Air lines and cables must not be tangled or stretched, and correctly coupled/connected. They must be functional, undamaged and either connected properly or stowed correctly.
- Security.

1.7 Vehicle posture

The applicant must check the vehicle is:

- Not leaning to one side.
- Sitting level front to back (the assessor may use some discretion where a prime mover or semi-trailer may not be sitting level).

1.8 Load security

The applicant must check:

- Restraint devices.
- Positioning of load.
- Serviceability of all latches, lockers, stowage compartments and doors.

1.9 Loose/missing/broken fittings

The applicant must check:

- The affects on serviceability of vehicle or equipment.
- For safety hazards (e.g. sharp edges or items likely to fall off).

1.10 Registration

The applicant must check that the:

- Vehicle and trailers have current registration.
- Registration label is showing (if applicable).
1.11 Lights & indicators
The applicant must check that:
- All lights and indicators are compliant (i.e. present, working, and lawful).

1.12 Drive belts & pulleys
The applicant must check:
- The condition of belts (e.g. not frayed or worn).
- The adjustment of the belt. The assessor should question the applicant on the appropriate tension required and how to adjust the belts.

B.14.2 Criteria 2 Cabin Drill

Performance
Demonstrate all adjustments required to ensure safe, effective and comfortable operation of the vehicle. Locate, identify and where appropriate describe the function of controls, gauges, and warning lights.

Conditions
- Parked and secured.
- Engine not running.
- Assessor (and auditor) must be provided with Lap/sash retractable seatbelt. Buses may be exempted by the Licensing Authority.

Requirements
- One off test.

Assessment duration
- 5 minutes Rigid Vehicles – 5 minutes HC& MC

Test Criteria

2.1 Seating position
The applicant is assessed:
- Entering and leaving the driver’s cab to meet OHS&W requirements:
  - Approaching the driver’s cab from the front of the vehicle, facing oncoming traffic and aware of approaching traffic
  - Using the steps foothold and grab handle if fitted to the vehicle – 3 points of contact
  - Using the hand rail for leverage (using the steering wheel is not acceptable)
  - Maintaining three points of contact entering and leaving the vehicle
  - Adjusting seat for good posture, comfort and operation of controls.

2.2 Seatbelts
The applicant must check that:
- The seat belt is adjusted (if required) and fastened.

Note: Assessors/Auditors are responsible for fitting their own seatbelt. Although the applicant is responsible for ensuring that all other passengers fasten their seatbelt(s). Assessors should not attempt to "trap" the applicant.
2.3 **Mirrors**

The applicant must check:-

- Mirrors are not cracked or broken and adjusted for effective vision.
- In the case of a bus, all internal mirrors are set correctly for passenger monitoring.

2.4 **Cleanliness**

The applicant must check the:-

- Cabin for loose articles and take appropriate action to safely store any loose articles.
- Windows and windscreen are clean, not broken or cracked and do not obscure applicant’s or assessor’s vision.

2.5 **Controls**

Applicants must be able to identify all of the listed controls (if they are fitted):-

- Seat adjustments.
- Engine start and stop systems.
- Indicators/hazard lights/school bus warning lights.
- Washer/wipers.
- Service brake.
- Park brake.
- Trailer brake.
- Clutch.
- Gear changing mechanisms including range selectors and splitters.
- Accelerator/throttle systems.
- Steering wheel.
- Horn(s).
- Air conditioning/heating/demisting systems.
- Auxiliary brake switches/controls.
- All lighting controls.
- In cab suspension adjustments (if fitted) – bus only.
- Passenger door operations/interlocks – bus only.
- Passenger stop cords/buttons/warning lights –bus only.
- Other (as applicable to the test vehicle).
B.15  Section B: Vehicle Operation and Control

B.15.1  Criteria 3  Start, move off, shut down and secure

Performance
Demonstrate engine start and shut down procedures.
Demonstrate brake checks prior to moving off.
Move off from the kerb safely and maintain full vehicle control. Demonstrate a safe return to the kerb, a safe departure from the kerb and securing of the vehicle.

Conditions
Parked on the road adjacent to a kerb in a low level traffic area, with no overhanging obstructions.
The engine must not be running at commencement. Return to kerb preferably free of parked cars.

Requirements
One off test but can also be assessed at different stages throughout the FCA/CT (i.e. do not assess “shut down” and “secure” until the end).

Assessment duration
Part of the “on-road” component

Test Criteria

3.1  Start Engine
The applicant must in accordance with the vehicle manufacturer’s guidelines and specifications:-

- Ensure park brake is applied.
- Ensure auxiliary braking systems are turned off.
- Ensure gearbox is in neutral/park (auto).
- In a diesel heavy vehicle, check engine stop mechanism is in the start position (if fitted):
  - switch on start heater (if fitted and required)
  - allow to warm (if required)
- Engage the clutch (if not fitted with an air assisted clutch and air pressure is low).
  - Switch on the ignition.
  - Activate the starter.

3.2  Instruments & gauges
The applicant must check the following items:-

- Fuel, oil pressure, alternator, temperature, tachometer, voltmeter, air pressure.
- Monitoring devices (warning lights, air pressure warning system, buzzers).
- Service brake (move vehicle forward then apply the service brake).
- The Park brake and ensure it is on.*
- The Trailer brake.*

* When using a low gear bring the clutch to friction point and apply load to the park brake or trailer brake as required.
Note: The applicant must be asked to support their checking with a commentary to demonstrate why they are undertaking the check of each item.

3.3 Move off

The applicant must:

• Ensure all the doors are shut.
• Depress the clutch; select the appropriate gear (manual).
• Place the foot on the brake, select drive (auto) or the appropriate pre-selection range.
• Check the mirrors (right and left).
• Indicate for a minimum of 5 seconds.
• Apply the appropriate power.
• Release the clutch to friction point & hold.
• Check all the mirrors and blind spot.
• Release the park/trailer brake.
• Engage the clutch.
• Accelerate smoothly.
• Steer the vehicle away from kerb.
• Cancel the indicator.

3.4 Return to kerb

The applicant must:

• Check all mirrors.
• Indicate.
• Apply the service brake.
• Depress the clutch, slightly above stalling.
• Stop smoothly, parallel & close to the kerb but not over hanging the kerb.
• Apply the park brake.
• Select neutral in a manual and park in an auto.
• Release the clutch and the foot brake.
• Cancel the indicator.
• Open the passenger door (bus only) (if operable from Driver’s seat).

3.5 Shut down Vehicle

The applicant must:

• Apply the park brake.
• Select neutral in a manual and park in an auto.
• Check the operational gauges.
• Allow the engine to idle (if required).
• Activate the engine stop mechanism to stop (if fitted).
• Turn off the engine.
• Switch off the ignition.

### 3.6 Secure vehicle

The applicant must:

• Check that the park brake is applied.
• Remove the key.
• Check for traffic (by mirror or head check) before opening the door.
• Use step, footholds and grab handles if fitted to the vehicle. Must not use the steering wheel for support.
• Exit backwards by using the available steps and grab handles and not jump to the ground while at all times maintaining three 3 points of contact.
• Secure the door.
• Leave the cab area by walking in a safe direction.

### B.15.2 Criteria 4 Manages Steering

**Performance**

Demonstrate safe and competent steering skills in a range of road and traffic environments.

**Conditions**

A kerbed road (or road with clearly defined edge to seal or edge line markings).

A low level traffic area including sections of straight and sweeping curves and intersections.

Include sections of multi-laned roads where possible.

Variable posted speed limits including one section of at least 80km/hr.

**Requirements**

Continuous test.

**Assessment duration**

Part of the “on-road” component

**Test Criteria**

#### 4.1 Smooth directional changes

The applicant must:

• Apply incremental movements where the action does not unsettle occupants or affect the stability of the vehicle or its load.
• Steer the vehicle taking care with the effects of road cambers.

#### 4.2 Hand position & grip

The applicant must:

• Have both hands on the wheel except when operating the controls.

• Have hands in an acceptable steering position (i.e. either “ten to two”, “quarter to three”, or “twenty to four”). Hands and fingers must be on the outside of the wheel with palms on the rim.

• Apply “Hand over hand” or “pull – push” steering technique. Palming is acceptable provided that there is no loss of control of the vehicle.
4.3 **Straight line driving**

The applicant must:

- Comply with lane markings.
- Maintain correct road position and constant direction without wandering, crossing lanes, crossing centre lines or the road edge.

4.4 **Curves & bends**

The applicant must:

- Adjust to an appropriate speed and gear prior to entering curve.
- Position the vehicle in the curve to avoid the rear of the vehicle sweeping out of the lane or off the road.
- Observe and check the mirrors as required.
- Competently and smoothly operate the controls throughout.
- At all times give due regard to prevailing road and traffic conditions.

4.5 **Intersections**

The applicant must:

- Maintain safe and legal road positions before, during and after turns.
- Not unnecessarily cross the centre of the road on entry or exit.

4.6 **Railway crossings**

The applicant must:

- Approach the crossing demonstrating vehicle control.
- Observe and check in both directions.
- Check the mirrors.
- Obey all road markings.
- Clear the intersection with the whole length of the vehicle.

**Note:** If the applicant is unable to demonstrate at a crossing then the assessor may seek knowledge and understanding by asking appropriate questions.

4.7 **Kerb clearance**

The applicant must:

- Avoid mounting or brushing kerbs during any normal driving situation.
- Must be aware of kerbside obstacles such as overhanging tree branches, awnings and signs.

**Note:** If an applicant mounts a kerb (including roundabouts not constructed for such a purpose) during a normal driving situation the assessor must consider whether this action is dangerous and consider whether test termination is necessary. Some discretion may be used for large and articulated vehicles.

**B.15.3 Criteria 5 Manages Gears**

**Performance**

Demonstrate smooth efficient gear changing and gear selection according to road, traffic, speed and vehicle transmission requirements.
Conditions
Various speed limits.
Intersections that require stopping, slowing and turning.
Some inclines and descents which increase the degree of difficulty.

Requirements
Continuous test.

Assessment duration
Part of the “on-road” component

Note: Missing a gear change but recovering on the second or third attempt is acceptable providing a dangerous situation is not created, (using the splitter only must not be recorded as a gear change). Assessors must refer to Guidelines for Assessing Competence to determine if an applicant has achieved competence. Severe deficiencies in gear changing should not be tolerated especially where there is continual forcing and clashing or where there is no clutching or out of sequence clutching causing a dangerous situation.

Test Criteria

5.1 Appropriate gear for speed/gradient
The applicant must:-

- Always engage an appropriate gear for the road speed where the engine is either over revving or laboring/lugging/stalling.
- Select the appropriate gear for the terrain and traffic.
- Use step or skip shifts according to the road and traffic situations.
- Not coast in neutral or in gear with the clutch disengaged.

Note: Feathering of the clutch to allow some mismatch between revs and speed when slowing is acceptable.

5.2 Smooth changes without clashing
The applicant must:-

- Match engine revs to the road speed for that gear.
- Change gears smoothly.

Note: Smoothly means non aggressive shift movements and timing of the clutch release where the result does not unsettle occupants, stability, load, or cause damage to the drive train or trailer connection device.

5.3 Correct use of clutch
The applicant must:-

- Use double declutch gear changing methods when operating a non- synchromesh gear box.
- Not rest a foot on the clutch pedal.
- Correctly use the clutch, brake or counter shaft brake (where fitted).
- Declutch at the appropriate time to avoid laboring/lugging/stalling when bringing the vehicle to a stop.

B.15.4 Criteria 6 Manages Brakes
Performance
Demonstrate controlled and safe braking for the purpose of both slowing and stopping the vehicle.
Conditions

Various road and traffic conditions.
Include recognisable stopping points.

Requirements

Continuous test.

Assessment duration

Part of the “on-road” component

Test Criteria

6.1 Efficient use of brake system

The applicant must:-

• Use a combination of auxiliary and service braking systems in combination to maintain safe speeds to suit the environment and conditions.

• Maintain control of the vehicle.

• Combine braking systems with the use of the appropriate gear.

6.2 Smooth application

The applicant must:-

• Plan ahead by making decisions that allow for good vehicle positioning.

• Apply brakes smoothly and evenly to avoid lurching forward.

6.3 Stopping point accuracy

The applicant must:-

• Stop at safe, legal, nominated points.

Note: At stop signs the applicant must stop the vehicle completely before the stop line. No part of the vehicle is allowed to encroach on the stop line.

B.15.5 Criteria 7 Manages Accelerator

Performance

Demonstrate smooth and progressive acceleration.

Conditions

Safe roadside area from which to commence acceleration.

Requirements

Continuous test.

Assessment duration

Part of the “on-road” component

Test Criteria

7.1 Manages engine power (Engine power is managed to minimise engine and driveline damage and due consideration is given to the environment)

The applicant must:-

• Accelerate without excessive engine revs whilst releasing the clutch.

• Move off without jerking, stalling or riding the clutch.

• Engage the correct revs for the particular gear being used and match the revs to the road speed (low rpm for low gears to higher rpm for higher gears).
7.2 Smooth & efficient

The applicant must:-

- Apply and release the accelerator smoothly to produce the desired change of speed.
- Use rpm within manufacturer’s specifications and maximize fuel efficiency.

B.16 Section C: Low Risk Driving Behaviours

Low Risk Driving (LRD) involves the proactive application of skills and behaviors that can effectively reduce crash risk. Central to LRD is the concept of Crash Avoidance Space (CAS). CAS is the space required to avoid or reduce the risk of a crash occurring. As well as being created, CAS must also be maintained and protected. This is a conscious and continuous process that requires both awareness and skill.

Heavy vehicle drivers in particular need to have a good understanding of LRD and the various ways it can be applied to enhance road safety.

B.16.1 Criteria 8 Create & Maintain Crash Avoidance Space (CAS)

**Performance**

Demonstrate continuous scanning of the road and the traffic environment making subsequent adjustments to speed and position to maintain a safe distance from vehicles and obstacles to the front and the sides.

**Condition**

Varying road types (dual carriageway and two way road systems) including medium level traffic conditions.

**Requirements**

Continuous test.

**Assessment duration**

Part of the “on-road” component

**Test Criteria**

8.1 Following distance (moving)

The applicant must:-

- Maintain a four (4) second gap (as a guide) behind the vehicle directly in front increasing the gap in adverse conditions.

8.2 Stopped position

The applicant must:-

- Stop in a position behind other vehicles allowing sufficient space to steer around the vehicle in front, if necessary.

8.3 Speed selection

The applicant must:-

- Select a speed that is both within the posted limit and appropriate to road and traffic conditions (which may be less than the posted limit).
8.4 Cushion to the sides
The applicant must:-
- Maintain a sufficient space to the side from parked vehicles and road side hazards.
- Vary the position in the lane to provide a buffer from oncoming vehicles and those moving in the same direction.

8.5 Lane selection
The applicant must select a lane:-
- In compliance with road law and the prevailing traffic situation.
- Which is the most appropriate one for the vehicle being driven, to ensure safe turns.

B.16.2 Criteria 9  Protect Crash Avoidance Space (CAS)

Performance  Demonstrate appropriate responses to situations if CAS is threatened or compromised.

Condition  Varying road (dual carriageway and two-way road systems) and medium level traffic conditions including pedestrian areas if possible.

Requirements  Continuous test.

Assessment duration  Part of the “on-road” component

Test Criteria

9.1 Speed Control
The applicant must:-
- Adjust speed to regain CAS in response to changes in road or traffic conditions and speed limits (e.g. when other vehicles cut in or when the test vehicle is in another vehicle’s blind spot).
- Reduce speed in anticipation of the need to stop (e.g. lights ahead which have been green for some time).
- Approach stationary or slow moving vehicles in front with caution.
- Drive close to the posted speed limit when safe to do so.

9.2 Gap selection
The applicant must:-
- Select gaps in traffic which do not encroach on another vehicle’s CAS without slowing traffic flow.
- Must not reject more than three opportunities to select a suitable gap.

9.3 Maintains traffic flow
The applicant must:-
- Efficiently maintain forward progress by selecting suitable speeds, lanes, and lane positions in relation to forward and adjacent traffic.
- Be courteous to other road users.
- Accepts the first safe gap and rejects unsafe gaps.
- Not give way unnecessarily.
9.4 **Observe road & traffic environment**

The applicant must:-

- Scan continuously to the front and sides looking for hazards. Scanning needs to be performed at short, middle, and long distance ranges.
- Monitor left and right mirrors for traffic to the sides and rear on a regular basis.

9.5 **Responds to risks/hazards**

The applicant must:-

- Apply low risk driving strategies by reducing speed and covering the brake when a hazard is identified. The assessor may not always be able to see whether the applicant is covering the brake in which case they should focus on speed reduction to assess this item.
- Increase space to the sides where hazards exist (e.g. parked vehicles or oncoming traffic).
- Adjust speed and/or position in response to limited vision of the road or traffic environment (e.g. where vision is limited due to other vehicles or objects blocking the line of sight at intersections, blind corners, and crests etc.).

**Note:** Hazards are not just rare or extreme events. A hazard is any situation where there is an increased risk of crash.

---

**B.17 Section D: Compliance**

**B.17.1 Criteria 10 Road Rules and Directions**

**Performance**

Demonstrate observation and compliance with road rules and regulations and follow the assessor’s directions.

**Condition**

Varying road and traffic conditions.

**Requirements**

Continuous test.

**Assessment duration**

Part of the “on-road” component

**Test Criteria**

10.1 **Obey road rules**

The applicant must:-

- Obey all the road rules.
- Observe and never exceed the speed limits.
- Stop as near as practicable to, but with no part of the vehicle encroaching over the stop line at a stop sign, or when the vehicle is the first one to stop at red traffic lights.
- Approach traffic lights, give way signs and pedestrian crossings at an appropriate speed and be prepared to stop, if necessary.
- Give way to other traffic where necessary.
- Not drive in an aggressive manner.
- Obey regulations relevant to the test vehicle.
- Not straddle the lanes unnecessarily.
10.2 Follows assessor’s instructions

The applicant must:-

- Follow all reasonable directions given by the assessor.
- Comply with all directions given by Police or other authorised person(s).

Note: Failure of an applicant to comply with directions given by Police or other authorised person(s) must result in immediate termination of the test. Failure of the applicant to follow the assessor’s instructions may also result in test termination if the assessor believes that the applicant’s action is deliberate with a view to avoiding the performance of a specific task.

B.18 Section E: Additional Risk Management

B.18.1 Criteria 11 Reverse

Performance Demonstrate safe and accurate vehicle control during reversing manoeuvres.

Conditions Centre driving mirror offset (if fitted) and/or rear window blocked off.

- Straight level road with either a kerb, marked edge line or a clearly defined straight seal edge.
- Non-traffic or low-level traffic area. May be an off-road location. Clear of traffic and pedestrian activity.

Requirements One off test.

With the exception of class MC, applicants must successfully complete a Long Reverse and one of the following three low speed manoeuvres (LSM) as determined by Licensing Authorities:

- 11.2 – Reverse Parallel Park (Rigid vehicles only)
- 11.3 – Off-set Reverse (excluding MC)
- 11.4 – Loading Dock simulation (excluding MC)

Assessment duration 10 minutes for each reversing assessment

Note: Reversing manoeuvres carry a higher risk. It is an assessor’s responsibility to choose locations that minimise the likelihood or consequences of injury or property damage. Where approved in some jurisdictions, or in off road locations, the assessor may be able to alight from the vehicle to ensure the safety of other road users. The use of a whistle may be required and high visibility clothing must be worn by the assessor.

Test Criteria

11.1 Long reverse for all vehicle types

The applicant must:-

- Activate the hazard lights.
- For LR, MR, HR - demonstrate a full reverse. (4 vehicle lengths)
- For HC and MC - demonstrate a 70 metre straight line reverse. (If the vehicle is a pocket road train or a double road train, reverse one trailer length.)
- Maintain observation for traffic.
- Not have any wheel cross the edge line (or seal edge, or kerb).
• Not have any wheel more than one metre (as a guide) from the edge line (or seal edge, or kerb).
• Not make any forward adjustment (HC may make one forward adjustment and two for MC).
• Secure the vehicle at the end of the exercise.
• Switch off hazard lights.

11.2 Reverse parallel park
(Rigid Vehicles only)
The applicant must:-
• Check the mirrors.
• Operate the left indicator for an adequate time to alert other road users.
• Operate the hazard lights.
• Make no more than four direction changes.
• Achieve final position:
  – behind the forward parking pole.
  – (as a guide 1 to 2 metres behind)
  – wheels close to the kerb (as a guide within 500mm from the kerb)
  – body of vehicle parallel to the kerb
• Not touch the kerb, any vehicles or parking poles.
• Competently operate the controls throughout.
• Switch off hazard lights.
  Note: This manoeuvre may be assessed using a simulated environment in an off road location (e.g. using bollards or parking poles).

11.3 Off-set reverse (may include reversing around a left hand kerb) (except MC)
The applicant must:-
• Activate the hazard lights.
• Check the mirrors.
• Reverse into the end position and finish within 1 metre of the end markers (poles or bollards).
• Complete the task within 10 minutes for HC, and 5 minutes for rigid vehicles.
• Not cross any marked task lines or strike poles or bollards.
• Not have any wheel more than one metre (as a guide) from the edge line (or seal edge, or kerb).
• Not use more than 3 forward movements (HC only).
• Switch off hazard lights.
  Note: The applicant may stop the vehicle and alight to check its position as many times as required within the time allocated.

11.4 Loading dock simulation (All vehicle types except MC)
(The applicant must commence reversing from the correct side of the road and not reverse across lanes).
The applicant must:-
• Operate the hazard lights.
• Stop beyond the driveway and reverse (to the left) to a position that is central and parallel in the loading bay/driveway and, if possible, fully into the driveway.
• Not exceed one forward correction (shunt).
• Competently operate the controls throughout.
• Pay due regard to the traffic on the road and driveway.
• Drive with the doors shut.
• Not mount the kerb or strike any object.

**B.18.2 Criteria 12 Hill Stop/Start**

**Performance**  Demonstrate smooth safe stopping and starting when leaving the kerb on ascending and descending roads.

**Conditions**  Centre driving mirror offset (where fitted).

Select low level traffic, kerbside lane with kerb or distinct edge and space for drawing into or parking.

Moderate inclines and descents.

**Requirements**  The driver will, when ascending or descending draw into the kerb and stop the vehicle and then (when directed by the assessor) leave the kerb and continue driving along the road as per test elements.

One-off test

**Assessment duration**  Part of the “on-road” component

**Test Criteria**

**12.1 Ascent**

The applicant must:-

• Check all the mirrors.
• Draw into the kerb operating the left indicator for an adequate time to alert other road users.
• Stop parallel to and with wheels close to the kerb (as a guide within 500mm from the kerb/road edge).
• Check all mirrors and blind spot.
• Indicate right to leave the kerb (minimum 5 seconds).
• Not roll back when leaving the kerb.
• Operate all controls smoothly and efficiently.
• Conduct the manoeuvre with due regard for the safety and convenience of other road users.

**12.2 Descent**

The applicant must:-

• Check all the mirrors.
• Draw into the kerb operating the left indicator for an adequate time to alert other road users.
• Stop parallel to and with wheels close to the kerb (as a guide within 500mm from the kerb/road edge).
• Check all the mirrors and blind-spot.
• Indicate right to leave the kerb (minimum of 5 seconds).
• Not roll forward in neutral or clutch coast.
• Use the retarder/exhaust brake (if fitted) lawfully and correctly.
• Operate all controls smoothly and efficiently.
• Conduct the manoeuvre with due regard for the safety and convenience of other road users.

B.18.3 Criteria 13 Load Securing

Performance

Demonstrate the common methods of securing a load to confirm ability to check and, if necessary, adjust load restraints.

Visual inspection of ropes, chains, dogs, and straps prior to use. As detailed in the National Transport Commission Load Restraint Guide.

Conditions

Vehicle parked and secured without the engine running.

Non traffic area selected.

Safe pedestrian access to all sides of the vehicle.

Vehicle with a load (minimum height 1 metre) in place but not secure.

Tray configuration with any type of rail.

Sufficient rope, chains and dogs, winches/ratchets and straps.

OR

A simulated vehicle tray, equipped as above.

Requirements

One off test.

Assessment duration 20 minutes

Test Criteria

13.1 Ropes

The applicant must demonstrate a:-

• Truckie’s hitch.

• Single or double shank/hitch

13.2 Chains and dogs

The applicant must demonstrate how to safely use load binders. (Ratchet/recoilless dogs – not spring dogs.

13.3 Winches and straps/Ratchets and straps

The applicant must demonstrate how to safely use winches and straps or ratchets and straps.
B.18.4 Criteria 14 Coupling/Uncoupling

For Heavy Combination

**Performance**
Demonstrate coupling and uncoupling a semi trailer or a B-double trailer to and from the prime mover.

For Multi Combination

**Performance**
Demonstrate coupling and uncoupling of an A trailer to/from a B trailer of a B double configuration
or
Demonstrate coupling and uncoupling of a converter dolly to/from a semi trailer;
and
Demonstrate coupling and uncoupling of a lead semi trailer to/from a second semi trailer of a road train configuration.

**Conditions**
Parked and secure in a straight line.

Firm and level non-traffic area. Safe access around the vehicle. Suitable wheel chocks, if required.

High visibility clothing **must be worn**.

**Note:** The assessor may be out of the vehicle to observe and assess if allowed under local jurisdiction legislation.

**Requirements**
One off test

**Assessment duration**
- Coupling = 15 minutes
- Uncoupling = 15 minutes

**Test Criteria**

14.1 Uncouple

The applicant must:-

- Apply the park brake and switch off the emergency shut off valve.
- Ensure trailer security by chocking the wheels. If the trailer is fitted with maxi (spring) brakes, chocking is not necessary.
- Lower the landing gear ensuring firm and even contact with the ground.
- Raise the trailer until a gap is visible at the turntable (if applicable).
- Secure the handle.
- Disconnect, retract and secure the electrical leads, hydraulic lines (if fitted) and air lines.
- Open jaws or ring feeder.
- Move forward slowly until the turntable is just clear of the skid plate and confirm stability of the trailer.
- Drive slowly away (a distance of at least 10 metres). If the area is safe, and has sufficient room to operate, the prime mover should be driven around to the rear of the semi-trailer so that the task can commence from that point.
- Apply the prime mover park brake.
• Ensure the driver’s door is closed whenever the vehicle is moving.
• Conduct all procedures safely and efficiently.
• Procedures may vary due to vehicle configuration. The main emphasis must be on safety.

14.2 Couple

The applicant must:-

• Check that the king pin size is compatible with the turn-table jaws. Check the air lines and electrical leads are stowed correctly to prevent damage.
• Check the jaws are open.
• Ensure the trailer is secure. If the trailer is not fitted with maxi (spring) brakes, chocks are required.
• Position the prime mover just forward of the trailer. Check the entry alignment and ensure that the prime mover will clear the trailer (two positioning adjustments are allowed).
• Apply the park brake.
• Lower the skid plate onto the turntable until the weight of the trailer is imposed onto the turntable and the landing gear legs are just clear of the ground (10-20mm).
• Secure the handle.
• Reverse the prime mover slowly until the turntable jaws lock around the king pin.
• Perform a “Tug Test”.
• Apply the park brake.
• Check that the turntable release lever is in the locked position with no gap between the turntable and the trailer skid plate.
• Check the jaws are closed correctly.
• Fully raise the landing gear and stow the handle.
• Connect the air lines and the electrical leads.
• Switch on the trailer’s air supply valve (or air taps) and charge the trailer brake air system.
• Check the trailer air pressure.
• Switch off the engine and conduct a walk around inspection listening for air leaks. Stow the chocks (if applicable). Check to ensure all lights and indicators are operational and that the condition of the tyres is acceptable.
• Conduct all procedures safely and efficiently.

Note: Procedures may vary due to vehicle configuration. The main emphasis is on safety.

B.18.5 Criteria 15 Bus Stop Procedure

Bus Only

Performance Demonstrate smooth drawing into the kerb, stopping for passenger loading and leaving a bus stop with due regard for other road users and passenger safety.

Conditions Simulated stops are essential.

Requirements One off test.

Assessment duration Part of the “on-road” component
Test Criteria

15.1 Arriving at the bus stop
The applicant must:-

- Check all the external and internal mirrors before drawing into a bus stop.
- Draw into the stop operating the left indicator for an adequate time to alert other road users.
- Look for overhanging objects (e.g. branches, awnings).
- Bring the vehicle to a smooth stop.
- Stop the vehicle parallel and close to the kerb (as a guide front and rear steps within 300 mm of the kerb).
- Stop with the front door opposite a simulated bus stop embarking point.
- Apply the park brake. Activate the school bus warning lights (where applicable).
- Open the door(s) only when the bus is completely stationary – where this can be done from the drivers seated position.

15.2 When departing the bus stop
The applicant must:-

- Check the door(s) by head check and mirrors for alighting passengers.
- Check the bulkhead mirror (left hand side) through to the rear door mirror to confirm all passengers are clear.
- Check the centre door wells are clear before closing.
- Close the door(s) while stationary.
- Check all internal & external mirrors for people and traffic before leaving.
- Indicate to the right (minimum of 5 seconds).
- Check the blind-spot.
- Release the park brake or bus stop brake.

In general

- Accelerate smoothly.
- Cancel the school bus warning lights (where applicable).
- Cancel the indicator when in new lane position.
- Conduct the manoeuvre with safety and full regard for the comfort of passengers.