

**Submission
No. 30**

DRIVER EDUCATION, TRAINING AND ROAD SAFETY

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Date Received: 19/02/2017



**THE NSW DRIVER TRAINERS
ASSOCIATION SUBMISSION TO THE
PARLIAMENTARY STAYSAFE
COMMITTEE ON DRIVER TRAINING**

Introduction

The NSW Driver Trainers Association (NSW DTA) is an industry association supporting driving instructors in NSW. Our members cover a wide range of training expertise with practitioners covering a diverse range of training and assessment from Learner drivers, post licence training, heavy vehicles, older drivers and rider training.

The NSW DTA is committed to providing support for the driver training industry and improving the professional standards of instructors. Our aim is to have a positive impact on road safety through quality education.

The NSW DTA was a key member of the peak body, the Australian Driver Trainers Association (National) until its recent cessation of operations, and was the only NSW association represented at this National level. Over the years we have established a good working relationship with other industry bodies and have worked collaboratively towards the betterment of our industry and driver safety.

To date the NSW DTA has enjoyed a cooperative relationship with both Transport for NSW and The Roads and Maritime Services as well as Service NSW, and has served a consultative role in:

- The development of the NSW Safer Drivers Course for Learner Drivers.
- The review of the Older Driver Testing System
- The Federal Government National Road Safety Forum: Graduated Driver Licencing.
- 2016 TLISC review of Driving Instructor qualifications

Our submission to this committee will endeavour to address as many areas of the terms of reference as possible and give as much insight as we can from the perspective of the industry in question. We are happy to meet with and address the committee at anytime to discuss these matters further.

Current Driver Training

When discussing driver training as a whole, it is important to separate professional training from lay person training. Professional training being defined as that training conducted by a licenced driving instructor for some form of fee or reward, and lay person training defined as that training delivered by another person with potentially no formal qualifications, such as a parent or friend. There is also a third area of driver training that needs to be included which is post licence training. This is often conducted by persons with no training qualification or instructors licence, but delivered on a fee for service basis.

These three areas of training have different needs with regard to support, skills, regulation and training and for the purposes of this inquiry, need to be dealt with separately. Currently only professional training, delivered by licenced driving instructors, is subject to any form of regulation, which as will be discussed later, is cause for concern.

Professional driver training

In NSW, licenced driving instructors must abide by the NSW Driving Instructors ACT 1992, and the NSW Driving Instructors Regulations 2016, due to the fact training is conducted for some form of fee or reward. The current requirements for becoming a driving instructor are:

- Be at least 21 years of age
- Hold a full drivers licence for at least 3 of the last 4 years.
- Pass a medical check stating fitness to drive.
- Pass a Police and criminal check.
- Obtain a Working with Children Clearance.
- Pass a road rules knowledge test.
- Pass an on road driving test
- Complete the driving instructors training course with a recognised Registered Training Organisation (RTO)

To renew a driving instructor's licence every 5 years, a computer based knowledge test must be passed. There is currently no further training or assessment requirement or any other form of professional development requirements, to retain or renew an instructor's licence.

For the most part, professional driver training is delivered to young novice drivers; however there are a small percentage of clients who are in their 20's and 30's when seeking training. Also many licenced driving instructors are part of the Older Driver Assessment scheme that sees those conducting formal assessments of an older driver's ability to drive and retain their licence. There are also many within our industry involved with the delivery of programs such as the Safer Drivers Course for Learner Drivers and the Federally funded Keys2drive program.

Currently there is very little research into the effectiveness of the training delivered by licenced driving instructors, except for evaluations of programs such as Keys2drive. Whilst this evaluation has shown positive results, it is an evaluation of the program as a whole, and not just the effectiveness of professional training. Unfortunately, the professional driver training sector has often been lumped in with the post licence driver training sector when discussing the effects, both positive and negative, of formal driver training. Whilst there has been plenty of research both here and overseas that suggests driver training is ineffective and in some cases detrimental, it is often the post licence sector and advanced driver training sector that are the subject of said research, but the professional sector has been tarred with the same result.

The NSW Driver Trainers Association would not only recommend, but would encourage a large scale evaluation of the effectiveness of quality professional driver training, as delivered on a daily basis to young novice learner drivers. We believe that such an evaluation would not only highlight the benefits of such training, but would also identify areas for improvement or development.

Due to the lack of any requirements for further professional development, up skilling or reassessment of ability, the professional driver training industry is essentially self regulated. Whilst we are bound by an Act and Regulations, there is little, if any, third party regulation of this sector. Professional development is mostly on a voluntary basis and is carried out usually by the industry associations. Given the large number of licenced instructors in the state; the number of those who are members of an industry body; and those that actually attend any professional development offered to them, there are still a large number of instructors providing training who have never been reassessed or developed their skills since obtaining their licence. Those that have voluntarily undertaken some form of professional development have provided feedback to say it has helped in the way they train and achieving the outcome of better trained drivers, however this is only anecdotal evidence and there is little to no research that tells us that it is effective.

The quality of new driver trainers entering the industry is often of a poor quality due to poor training by some of the Registered Training Organisations (RTO's). This is a problem that stems in part from the training package that is being delivered, and that some RTO's have been able to interpret delivery needs as requiring minimal, if any, time in a car behind the wheel during the course. Whilst a new training package is being released, there is still very little auditing on the quality of instructors becoming qualified. In previous years, a final assessment of a trainee instructor was carried out by the RMS, meaning that the regulator had the final say in whether or not an instructor has been trained well enough to enter the industry. This final assessment has now been handed over to the RTO's meaning there is no independent final check on somebody before they are given a licence to go and teach new drivers. We believe there is room for change to this system.

Another area that has been overlooked is the need for continuous checks on driving instructor's to ensure they are fit for work with minors. As mentioned earlier, to obtain an instructor licence, we must have a police check done, and then we must also have a

Working With Children (WWC) check performed every 5 years. Whilst an instructor's licence is valid for 5 years, renewal of this does not always fall at the same time as the renewal of the WWC check. The NSW Driver Trainers Association is recommending that a police check must be done every time an instructor's licence is renewed. This would help ensure that anyone working in this industry is a fit and proper person to be working with minors. The more often any of these checks are performed, the more likely it is that any indiscretion will be picked up on.

Vehicle technology is rapidly changing, particularly in regard to safety features of most modern cars. Understanding and familiarity with these systems again is on a voluntary basis. Whilst our association has provided some professional development in these areas, and has plans for further training for our members, the take up is still small. Unless a driving instructor is motivated to learn more about such systems there will generally be a lack of knowledge that they are able to pass on to the next generation of drivers. We believe this leaves a huge gap in the understanding and appreciation for developing vehicle safety technology in future generations of drivers.

Some in our industry *are* embracing safety technology, and *are* going out of their way to buy safer cars to teach in, and in doing so are attempting to pass on the value placed on safety when considering vehicle purchases. Again anecdotal feedback seems to indicate this is having a positive effect. However technology is not just about safety and the cars we learnt to drive in are very different to the cars we are teaching in and that our clients will be buying in the future. Without professional development in this area, it becomes very difficult for instructors to help novice drivers develop the skills in how to interact with and engage the technology that is, and will be, available to them. As mentioned above however, there is no regulated requirement for our industry to keep up with such changing technology.

Whilst it pains us to admit it, our industry can be very lazy regarding self improvement and training development. Many in this industry will not do things unless they are made to or there is some sort of financial incentive to. Many will continue to carry on each day doing the same things they have done for years and almost all will tell you that what they do is fantastic. They will consider high test pass rates and good customer feedback as an indication that they are in fact doing a good job at creating safer drivers, despite the fact that the statistics show us crash rates sky rocket immediately after passing a driving test. Some have been in our industry for 30 or more years, and have never had any further training than what they received back then. Whilst we believe that all professional instructors should undergo regular refresher training, until there is a requirement, many will not be interested while ever their business has good turn over and they have a high pass rate.

Since the introduction of the "3 for 1" log book hours scheme in NSW, the average number of lessons taken by a learner has dropped. Because the "bonus" hours can only be granted for the first 10 hours spent with a driving instructor, many learners see that as the limit of how many lessons they are prepared to have. In other words, they place less value on any

further lessons as they won't get any bonus credit for them. Prior to the 3 for 1 coming in, the lesson average was higher than 10, meaning there was more opportunity for the professional trainer to have a bigger impact on the safety of the young driver. It also meant that professional training was valued more as something that could actually help, rather than just help get more hours in the log book. So despite the scheme attempting to place more value on professional lessons, it may have had the opposite effect.

Lay Person Training

Lay person training accounts for the majority of training received by most novice drivers, due to the required number of hours needed before obtaining a provisional licence, as well as the cost and sometimes accessibility of professional training. Unlike professional trainers, there are no requirements to be a lay person trainers, other than having a current Australian drivers licence.

Many parents of learner drivers are in their late 40's and sometimes 50's and therefore have not taken a driving test or knowledge test for around 30 years. In this time there have often been many rule changes and changes to acceptable driving practices that the supervisors have not made themselves aware of. Some do try and update their knowledge of road rules before training a learner driver, however most don't.

The RMS in conjunction with local councils run parents of learner driver workshops, or GLS workshops, which are a 2 hour information session to help supervisors provide more meaningful training to their learners. These workshops also help with understanding the legal requirements and restrictions for new drivers and how to complete log books. Whilst there are often some questions and discussion on road rules and driving techniques, it is not the core subject matter for these sessions and is only ever lightly touched on, if at all. Funding for these sessions has also been the subject of some cuts over the years, so we are seeing a downturn in the level of take up from supervising drivers. There are very few available funds for promotion of these workshops, so many within the local communities are unaware they exist.

Due again to no requirement for lay person trainers to update their own skills or knowledge, it is often the case that their own poor driving habits and misunderstanding of some road rules are passed on to their learner drivers. When engaging the services of a professional instructor, much of the time is often taken trying to "fix" the bad habits passed on from other supervisors. This often makes the professional training less efficient in its delivery as time may not be focused on good habit development, but the correction of bad habits.

Whilst many lay person trainers may in fact be driving cars with new technology, either safety tech or otherwise, it is not often understood very well by this sector. While vehicle safety as a factor in decision making when buying new vehicles, is rising, understanding of the technology itself is still very low. A low understanding of how the technology either works or is used by the driver, or how it can help prevent crashes, means that that information is less likely to be passed on to the learner drivers. A lack of understanding and knowledge can lead to a lower value being placed on this technology by the younger drivers when considering vehicle purchases.

The effectiveness of lay person training is hard to assess, and would depend on what is the desired outcome. If we measured effectiveness by how many young drivers pass their driving test, then we would have to assume that both lay person and professional training is effective. However if we measured its effectiveness by how many young people are having crashes in the 12 months after passing their driving test, we would have to say both forms of training are limited in their effectiveness.

Lay person training on its own can be very effective at preparing young drivers to pass their test, but due to a lack of direction on what to do, it is often not focused on how to remain safe after the test. Programs such as Keys2drive are trying to address this issue by supporting lay person trainers in how to use the learner period better for preparation for solo driving.

Evaluating the effectiveness of lay person training on its own would be very difficult without a directed research project involving a control group and various cohorts. As most young drivers have experienced a mix of lay person training and professional training, separation of the results of both would need further in depth analysis and research.

Post Licence Training

Post licence training is an industry sector that deals with providing training to drivers who already have a licence and are seeking further training in an off road controlled environment. This sort of training has often been referred to as defensive driver training, advanced driver training and lately low risk driver training. These are not necessarily different names for the same thing, but often refer to the different type of training and driving the course focuses on. Traditionally these types of courses run for 5 – 6 hours over one day and will involve a combination of class room based theory and on track practical driving. The ratio of each depends on the training being provided.

The public perception of this type of training is that it is great to learn how to get out of skids and slides and how to regain control of a car that has become out of control. For many people within the general population, they believe these to be life saving skills and many will insist on their young drivers attending such a course once they pass their driving test. Most are not aware of the research that tells us that courses that teach advanced skills such as skid control etc are detrimental to driver safety, in particular young driver safety. Unfortunately this type of training has often been used in the same context as traditional on road professional training when discussing the effectiveness of driver training. These need to be separated in this discussion as they are very different in course curriculum, delivery, evaluation and regulation.

The above mentioned style of course is often referred to as advanced driver training, and does focus on what to do when things go wrong, rather than not letting them go wrong in the first place. They rely heavily on physical skill development and “in the moment” decision making. The issue is that such skills cannot be developed sufficiently in 1 day and once the course is finished there is nowhere to practice said skills except for the public road.

Many course providers have started to shift into more low risk styles of training, which tend to have a bias towards classroom based training, with less time spent behind the wheel. The time behind the wheel is for kinaesthetic learning of the concepts discussed in class regarding stopping distances and the benefits of some vehicle technologies. There has been very little evaluation of these types of courses, however the information provided in them is widely accepted by the road safety industry as best practice i.e. leaving larger Crash Avoidance Space (CAS), preparing for hazards, driving to the conditions etc.

This industry sector however, is unregulated. There are no requirements for becoming a post licence driver trainer or even setting up such a business. Many of these companies have been set up by ex police officers, racing drivers and other forms of business people. There is literally nothing to stop the average person off the street setting up a post licence training business and delivering training on safe driving.

Many of these companies have built their business model on delivery to the corporate sector, as more businesses become aware of their duty of care towards employees who spend some time on the road as part of their employment duties. Post licence training companies will often use a mix of permanent facilities, such as race tracks, and other itinerate sites to best accommodate the needs of their clients. Many will also sub-contract delivery of courses rather than have paid employees, and these sub-contractors may range from professional licence driving instructors, racing drivers or even professional facilitators.

Whilst unregulated, many large companies contracting the services of a post licence training company will often insist on facilitators holding a qualification in workplace training and assessment, which is not industry specific.

This industry sector is possibly the best advocate for vehicle safety technology out of the three areas of training. This is due to the fact that many safety features of a car will affect how it stops, steers and responds to hazards and emergencies, so it is crucial for them to include it in delivery of the practical parts of the course. These providers can be great spokespeople for the inclusion of safety tech when considering vehicle purchases.

Driver Group Needs

For the purpose of this inquiry, driver groups could be separated into several categories: Learner drivers; provisional drivers; experienced full licence holders; supervising drivers; older drivers; professional drivers. Each of these groups has differing needs when it comes to driver education, despite the fact that the desired outcome is still the same.

Learner drivers

It is well known within the general community that young drivers have the highest crash rates of any driver group and are over represented in casualty and fatality rates. However what is less known is that learner drivers are actually the group of drivers with the lowest crash rates. There is a tendency to group all young drivers together when thinking about

crash rates etc, but by doing so we can be overlooking the differences between learner drivers and provisional drivers and their differing needs.

Learning to drive can be a very complex and taxing time, and for many they may have one goal in mind, which is to pass the driving test. Because of this, the direction taken by the learner, their supervisors, and often their professional instructors, is to focus on what to do to get through the driving test successfully. But this is often because they are not sure what else to do or what direction to take. This can be a symptom of the GLS system we have in NSW, whereby implementing a mandatory number of hours, many think that simply getting to that number must mean they are ready to drive solo. If the system says I should be ready, then I must be ready.

The supporting material given to and available for learner drivers is still very much driving test centric. In the learners log book for example, there are 20 learning goals that cover many of the skills needed for a learner to pass the test. Even number 20 is simply preparing for the test. Another booklet given to them is called "A guide to the driving test" and focuses on what needs to be done when sitting the driving test. Both of these documents focus entirely on physical driving skills and direct the focus towards an end goal of passing the test. None of this supporting material assists the learner or their supervisor with what they could do to focus on post test safety or the complex behavioural factors contributing to crashes. In other words, the publications available suggest that learning to drive should be about focusing on a driving test rather than safe driving.

The Safer Drivers Course for Young Learner Drivers was developed to try and address this gap, by focusing predominantly on behavioural change and low risk strategies, rather than driving skills or test requirements. And anecdotally it has done a good job. It is still too early for a full independent evaluation of the course to prove it has had the desired effect, but early signs are positive. And this is the sort of training that research tells us would be more beneficial. Behavioural change and resilience training have long been overlooked as useful tools at preparing safer drivers, and are only now starting to get some recognition.

The real needs of learner drivers is for a system that takes the focus away from the driving test and offers a more wholistic suite of training and education programs and materials that complement each other. Making these programs and materials accessible and affordable is the challenge, but strong investment in this next generation of drivers is vital.

Whilst we are working within a graduated licencing system (GLS), there is still room for review of current restrictions within that scheme. The purpose of a GLS is to incrementally remove restrictions to driving and gradually moves towards becoming a full licence holder with all of the benefits that brings. However there has long been a belief that a GLS should also restrict the experiences younger drivers should get at the various stages of licencing, and these restrictions have often come in the form of speed restrictions. On paper these would seem to be a good idea; however in practice in the real world they create dangerous situations as well as a big leap when moving from one licence level to another.

At the moment learner drivers are restricted to 90km/h, which is the same as P 1 licence holders. The change from 80 to 90 several years ago came about as a result of a push from various parties including the Police and our association. However despite pushing at the time for the increase to go to 100km/h, it was the Auditor General's report, that recommended 90 km/h, that was taken into consideration more and hence the increase from 80 to 90 was implemented. What this report failed to take into consideration was the big difference between vehicles travelling at 90 km/h and others travelling at 110km/h. A speed differential of 20 km/h can be a very dangerous situation on many roads, in particular where merging is required. A classic example is merging from the M5 to the M7 in Sydney. In this situation your lane becomes the new right lane on the M7 where shortly afterwards, the existing left lane of the M7 ends, forcing people in that lane to merge right. If a learner or p1 licence holder has entered the M7, they are now in the right lane driving at least 10 km/h slower than everyone else. They need to merge over to the left so as to not be in the right lane (keep left unless overtaking), however that lane is now full of those cars that were on the M7 and have merged together. If you have ever experienced this situation, you would understand the true meaning of driver impatience and increase in risk.

To other issue with this speed restriction is that it means when a driver transitions from one level of licence to another, they are then able to drive at higher speeds than they have ever experienced. A lack of experience here can result in poor vehicle handling and speed control, as well as a lack of understanding regarding the increase in stopping distance and vehicle dynamics at higher speeds.

The NSW Driver Trainers Association would again like to see the speed restrictions for Learner, P1 and P2 licence holders readdressed and increased. We would like to see each of these licence classes able to drive at the posted speed limit. This increase would allow them to experience the sensation of these speeds while still supervised on a learners licence, as well as removing the great speed differential on major highways and country roads. Such an increase would also see NSW come into line with the other Eastern States.

Provisional drivers

Provisional drivers are the most regulated and controlled group of drivers on our roads, yet they are still over represented in crash rates. This indicates that something is missing. Some of what is missing is discussed above for learner drivers; however there are different needs for provisional drivers.

To date most of our interventions have taken place in the learning phase of driving, and once a provisional licence is obtained, we tend to just restrict. Very little has been done in this area, although the P Driver Project has set out to research the effectiveness of post learner's interventions. That project has limitations and has suffered from lower interest and take up rates than required. However it is a start.

The biggest needs for someone on their provisional licence are mobility and independence. These open up study and employment opportunities, as well as increased social presence, freedom of movement and residency locations. The requirement to make this group safer on the roads needs to take into account these needs and have as little negative impact on

them as possible. Our current GLS restrictions have so far tried to accommodate these needs as much as possible while attempting to keep them safe. The rise in crash rates so soon after obtaining a provisional licence would suggest we are failing in that goal.

Apart from licence restrictions, little is done to support provisional drivers with the aim of keeping them safe. During the learners licence phase, these drivers were offered various levels of support, however once they pass their driving test, there is no support and only ruling with an iron fist. Whilst we accept that restrictions need to be in place, and penalties used as deterrents against unsafe practices, we believe there is a lot of scope for development of materials and programs that offer support to this group of drivers. Our current system suggests to them that the learning stopped when they passed the test, and we have nothing in place that says anything else to them. Compounding this issue are the recent changes to the GLS that will see no further testing of drivers once they have passed the driving test. The test to progress from P1 to P2 is being moved to earlier in the system, and the final test to progress from P2 to full licence is being scrapped all together. The message we are sending with these changes is contradictory to our desired goal.

Experienced full licence holders

Making up the bulk of the driving population, this is a group of drivers that driver education and training has forgotten about. Once someone has progressed onto their full licence, there is no further testing or education of drivers. The responsibility has been placed onto the shoulders of all drivers to make themselves aware of changes to road rules or safe driving practices, yet most drivers have not fulfilled this obligation.

The evidence is clear when looking at the results of social media quizzes and tests set up by organisations like the NRMA, that the general population is very unaware of many current road rules and safe behaviours. Comment sections are filled with keyboard battles from people claiming what they think is right while at the time openly displaying their ignorance. A common theme is “when did this change?” or “how are we supposed to know?” We believe in general most drivers want to know and be up to date with what they should be doing on the roads, but by and large have felt neglected and forgotten when it comes to making such information public.

An often suggested solution is to make knowledge tests mandatory at time of licence renewal, and it may in fact be part of the solution. However a major issue would be the infrastructure required for such a process and as the experience with learner drivers just practicing the test proves, it's not without its flaws. But there is room for more education of licenced drivers through targeted marketing of changes to safe practices and rules, which may go part of the way to closing that gap.

Social unacceptability of certain behaviours is also a huge influencer of crash rates. History has shown us that the introduction of key safety measures such as compulsory seat belt fitment and wearing, and later random breath testing, made huge impacts in the number of crashes and casualties. In a relatively short period of time it became socially unacceptable to ride in a car without wearing a seatbelt, or to drink and drive. Whilst a small portion of the driving population still displays these behaviours, it is much, much less than it was prior to

those interventions. Yet today it is still considered socially acceptable to drive over the speed limit, or to use a mobile phone while driving. To improve the safety of this large group of road users, a broad scale education and marketing campaign could be used to change the view of these behaviours within our community.

So for this group of drivers, education rather than training would seem to be the most effective approach towards improving overall knowledge, behaviours and acceptance of role they play in road safety.

Supervising Drivers

As discussed earlier, this group of drivers does the bulk of the training of learner drivers, and therefore have the greatest opportunity to have the most positive influence on that group. However, by and large they have been left to their own devices. There is very little support for supervising drivers with regard to how to teach, what to teach, what goals to be aiming for etc. Programs like keys2drive have tried to address this by making supervising driver's part of the program and free lessons, however it's not enough. The GLS workshops mentioned earlier also try and help but are limited in terms of time and amount of content to be delivered.

As professional driver trainers, we often have contact with the supervising drivers, and one message that comes across regularly is the lack of support. They feel on their own and left to do what they think is appropriate and therefore end up focusing on a test as the end goal. They are looking for information on driving techniques, teaching techniques and how best to support their young driver, and for many they would like that to be centralised and come from an official location i.e. government.

Older Drivers

The needs of older drivers have been explored many times over, and were discussed at length a few years ago during the Older Driver Assessment Review. One of the big things that came out of that review is the need to keep older drivers as mobile as possible. We know that health declines more rapidly once a licence is taken away and independence is lost, but the challenge is to balance that without compromising safety for the general public.

Another issue that was realised was the lack of planning for retirement from driving for most people. We plan on retiring from work etc, but choices we make with regard to where we live etc don't always allow for the fact we may retire from driving at some point. This puts a bigger reliance on keeping a licence and more pressure to stay on the road. We are not sure that this issue has had much follow up in the last 4 years, so it may need looking into again.

Many of the needs of older drivers have been addressed in NSW in the way the assessment program is run. By giving them the option of a restricted licence we are allowing them to remain mobile in their local area, but without the stress of sitting driving assessments regularly. There is still room for development within that scheme, particularly in regard to training that may happen prior to an assessment.

Professional Drivers

Professional drivers by definition either transport goods inter or intra state, or drive a bus, taxi or hire car and drive for more than 20 hours per week in that role. Due to the hours spent on the road each week by these drivers, their exposure risk is higher than the average driver. So their needs may be different. Like all of us though, their biggest need is to get home at the end of the working day.

Much of their risk is covered by and regulated by Workcover and employer chain of responsibility, and due to that, they are often kept more up to date with road safety strategies, road rules etc. Fatigue is often the biggest problem for this group, but again measures have already been taken to try and address this.

Needs of Trainers

As representatives of professional driver trainers in NSW, we are in a unique position to be able to comment on what many of our members feel they need. As driver trainers are also mostly small business owners, often their needs are split between guidance for running a business, and help with being better trainers and providing the best service and training to their clients. For the purpose of this inquiry we will focus more on this second group of needs.

Working as a driver trainer can be a very lonely job, even though you are dealing with different members of the community every day in each lesson, you can feel isolated from others in the industry as you essentially have no work colleagues or work place. Because of this isolation, exchange of ideas, solutions and training methods is difficult, so often driver trainers become very stagnant in what they do. As an industry body, we provide opportunities for instructors to get together and network and undergo professional development, but as mentioned previously, this is voluntary and take up is nowhere near where we would like it. In years gone by, the RMS (RTA at the time) held information nights for driving instructors at certain registries around the state. These were mostly well attended and gave the local instructor community the opportunity to talk directly to the regulator and get clarification on issues, be updated on new information, and to have a voice. These stopped over 10 years ago and have been sorely missed. We believe these should be brought back and held on a regular basis across a wide geographical area.

Most instructors feel they are left behind when it comes to being updated with new information from government and regulators, despite our best efforts to get it to them ASAP. There is difficulty with making this happen quicker as often news is released to the general public at the same time as our industry so it can often appear that the clients know things before instructors do. The problem would be that disseminating information earlier to the industry would mean that information can be leaked to the general public sooner than desired, and often there are embargos on some changes or information. That being said, it is often that the only information our industry is given is exactly the same as the public receives. This doesn't always give enough detail to be able to discuss changes etc

with clients fully, so a suggestion is for a more detailed version and explanation of changes or updates be provided to industry at the same time, or even a day or two earlier, so that instructors have the time to process it and understand it before needing to discuss it with clients.

Open communication with our regulators, the RMS, is an often discussed issue. For years our regulators have felt like a closed shop when it comes to communicating with our industry, and this has only become worse over the last few years with massive staffing and organisational changes within RMS. It has become a running joke within the industry that from week to week we don't know who we should be speaking to or who would be dealing with a particular issue. The general feeling is that if they can't seem to organise themselves well, then how can they regulate us well?

Lack of regulation is a real problem. Whilst we are supposed to be regulated by Roads and Maritime Services, there is very little interaction or action taking place. As an example, driving instructors are required to keep lots of different records of lessons delivered and can be audited on these at anytime. Since 2009 when the 3 for 1 scheme came into effect, we have been required to keep a structured lesson plan, signed by the client, for every lesson where the bonus hours were granted. However since 2009, we have not heard of any driving instructor in NSW being asked to produce such a document in the event of an audit. Hundreds of hours have been spent by our association in training members at our state wide workshops on how to complete these documents, only to continually be asked "why?" The purpose of these documents was to try and ensure that any instructor who was granting extra hours was providing training to a high standard and delivering structured learning to clients. In reality, *any* driving instructor has been able to grant extra hours in the log book and nobody has been checking on the quality of the training.

Whilst we are regulated, in reality the quality of training etc has become self regulated and market regulated. For many clients, if you can give them bonus hours in their log book, get them to pass the test and do it as cheaply as possible, then they are happy. However this results in many poor quality instructors in the industry that slip through the system because nobody is checking and professional development etc is voluntary.

In recent years our industry has received more recognition with regard to its ability to make a difference and provide quality training. This recognition has come about through being granted the ability to conduct older driver assessments, accrediting bonus hours in learner log books and deliver module 2 sessions for the Safer Drivers Course. And this recognition has been appreciated; however more needs to be done. This is difficult to ask for without the previously mentioned independent research into the effectiveness of this form of driver training.

To summarise instructor's needs, for the individual instructor, they need more support from both government and regulator. This would be in the form of clearer and earlier information updates and more open lines of communication. From the perspective of the industry as a whole, we need a cleaning up of poorer quality trainers in the marketplace, and this can't be

done with the current level of regulation. While ever we are accepting of lower quality training of learner drivers, we are accepting of the increase crash risk this poses to them.

Cost of Driver Training Standards

What are the costs of driver training standards that are being referred to? Are they the economic or community costs associated with poorly trained drivers? Are they the costs to government associated with maintaining driver training standards? Or are they the costs to the industry for maintaining standards? This term of reference seems very broad and undefined, and is therefore very difficult to have input into, so we are breaking our feedback up into three sections.

Cost to government and regulator

These costs would be difficult for us to comment on as they would be included as part of the internal budget for Transport for NSW and Roads and Maritime Services (RMS). As the industry regulator, it would be assumed that there are some internal staff costs associated with regulating our industry, however breaking down these costs would include separating the time staff members spend on that role from the various other roles they are now assigned. Over the last few years there has been, and continues to be, major restructuring within RMS. This has resulted in fewer staff dealing with bigger workloads, and often dealing with several areas of interest.

However these costs would still be minimal, as there is very little regulation intervention within our industry. The RMS has moved to a user pays system for any training that driving instructors may require, including training to be an older driver assessor or to deliver the safer drivers course. This would suggest that the RMS is making sure they recoup many costs associated with the driver training industry.

Cost to industry bodies

As a major industry body, it is important for us to help our members maintain high standards and to participate in professional development (PD). However running training workshops etc is not an inexpensive exercise and costs us a large portion of our limited annual budget. Whilst we could also move to a user pays system, we believe that members have paid their annual fees, and receiving free PD should be one of the benefits available to them.

Cost to the Driver Trainer

For driver trainers who do not wish to participate in any form of professional development, there are relatively few costs with maintaining their standard of training. However this may also result in a lower standard of training delivered to young drivers which then has a flow on effect to the crash risks of those drivers.

But for many instructors there are costs. These costs may be associated with organised professional development workshops run by our association. These can come in the form of lost income for the day, or for many, travel expenses. In our regional areas for example, it is

not uncommon for members to travel a few hours to a training session and perhaps have to stay overnight also. For other training, such as that delivered by the RMS or Youthsafe (safer drivers course training), there can be larger travel costs due to these sessions only being offered in Sydney, so regional instructors are expected to bear a bigger cost to partake in any such training.

There are also significant costs to instructors wishing to become involved in programs such as the Safer Drivers Course (SDC). Currently the fee for training to be an SDC module 1 facilitator is \$770, while module 2 coach is \$880. Initially when the course was first introduced, this training was free; however the RMS has outsourced the training to YouthSafe who are now charging the above figures. We have asked for a review of these costs, and to date have received no reply or justification for the prices set. We believe that these costs are exorbitant and cannot be justified, and are requesting that an investigation is undertaken to examine the pricing structure. These prices form a large barrier to instructors becoming involved with the program and delivering key road safety training to young drivers.

Recently a price was placed on training to become an Older Driver Assessor; however this cost is significantly lower than that for the SDC. As this accreditation directly enables a driving instructor to perform the duties of assessing older drivers for licence retention, therefore increasing their responsibility to the public to ensure safe drivers on the road, and takes a similar format to the SDC training, we cannot see any reason why the SDC training would cost so much more.

Ongoing costs to driving instructors attempting to keep up high standards usually come from other areas involved in maintaining a professional business. These include regular updates to vehicle, signage, record keeping, clothing etc. These costs however are not exclusive to driving instructors and would be indicative of those attributed to any small business trying to keep its competitive edge.

Cross Border Issues

Road safety is a complex issue with no silver bullet solution; however it is made even more complex by each state having different rules and systems in place to tackle the problem. When it comes to driver training and learning to drive, there are major discrepancies between states and territories. We believe that to achieve the best results, and to avoid much of the confusion, each state should be encouraged to adopt the same system and implement the same rules.

There is currently great confusion amongst the general public around what young drivers are allowed to do when travelling interstate; an issue that is of major concern for those living in border towns. For example, a NSW learner driver is restricted to 90km/h as it is a condition of their licence, so when they travel across the border into QLD or Vic, they are still restricted to 90km/h. However those learners from Vic and QLD can travel at the posted

speed limit, even if its 110km/h, leading to a massive difference in what they are both experiencing and increased difficulty in policing. Having one rule for all would eliminate this issue.

Also by having different GLS systems operating in each state and territory, we are sending a confusing message to young drivers. In NSW for example we are saying to be safe to drive solo you must do 120 hours of supervised driving with at least 20 at night. But in WA we are saying that you need to do 25 hours supervised, then be tested, and then complete another 25 hours supervised before you can drive solo. So which state has it right?

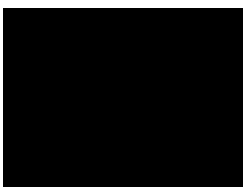
At the inaugural Road Safety Forum in Canberra in 2012, one of the outcomes of the GLS session was to investigate a model GLS that should be adopted by all states and territories. Yet 4 years later we still don't have one, and we believe that there was no progress on that investigation. This is something that needs to be fixed. We should not have a situation where someone living in Albury is bound by different rules than there mate living in Wodonga. Even recent news articles prove that the local police and state regulators get it wrong with the information they provide to young drivers trying to do the right thing and get the right information. Any quick search online will show the extent of this confusion as there are forums filled with people asking questions about what is right, and with many incorrect answers given.

There are also interstate issues around minimum qualifications for driving instructors. Some states require an instructor to hold a minimum of a Certificate IV in driving instruction; where as other states require an older or lower level of qualification. This can become a big issue when considering mutual recognition and the transferability of a driving instructors licence from state to state.

Summary

The NSW Driver Trainers Association welcomes this inquiry into our industry and driver education in general. We are disappointed that as a leading industry body we were not approached directly for comment or consultation; however we welcome the opportunity to provide feedback through the public submission process.

We believe that to improve road safety outcomes through driver training, everyone involved needs support, regulation, inclusion, consistency and direction. Without these, everyone is left to do what they think is right; and often it is not.



Anthony Cope

President

NSW Driver Trainers Association

