SENATE STANDING COMMITTEE ON RURAL AND REGIONAL AFFAIRS AND TRANSPORT
INQUIRY INTO ASPECTS OF ROAD SAFETY IN AUSTRALIA

Information requested from DECA on 22 March 2016

VicRoads reports on Market Share and student numbers

Please find attached the quarterly reports circulated by VicRoads to Victorian License-to-driver training providers. These reports provide information on the number of students, training providers and each training provider's market share.

Heavy vehicle license-to-driver training providers who offer free training

As can be seen from the attached VicRoads reports Victorian had 19 heavy vehicle license-to-driver training provider assessors in April to June 2015.

DECA's evidence to the Committee stated that the market is dominated by providers who provide cheap, quick and easy training and assessment.

The largest market share is held by *Journey Management* at 15%. In 2014 Journey management was advertising free training as I suspect were *Foresite* and *Bell Park*. When VTG rates were subsequently cut some provider began charging a small fee.

I suspect *Foresite* has changed its training delivery model and pricing structure.

Bell Park was recently delisted by VicRoads as a provider which leave Journey Management.

Journey Management no longer publish their price but there website's FAQ page seems to suggest that if you are eligible for VTG then the training may be free.

> ***What is the government funding? Can I get my courses for free?***
> *Funding eligibility is based on learner's Qualifications. Learners must be **'up skilling'** from their current qualification (in any industry) to be eligible for Government funding. For example, if a potential learner is currently a tradesman they would have a Certificate III level Qualification. They would then be able to enrol into Certificate IV Qualifications and receive funding. Any university degrees or diplomas would automatically deem a learner ineligible as they would not be 'up skilling'.*
> Web Address: http://www.journeymanagement.com.au/faq.htm

Number of hours of practical driver training at different providers

Craig Nichols the CEO of Armstrong Driver Training did research and compiled information to inform a meeting between Armstrong, DECA and VicRoads. The report is attached and provides an assessment of the number of practical driving hours being delivered by the different truck driver training providers in Victoria.

Regards,

Brendan Tenison-Woods

Director

Driver Education Centre of Australia Ltd

BRANCHES

VICTORIA | Altona North | Carrum Downs | Newborough | Puckapunyal | Shepparton | Wodonga

NSW | Riverstone

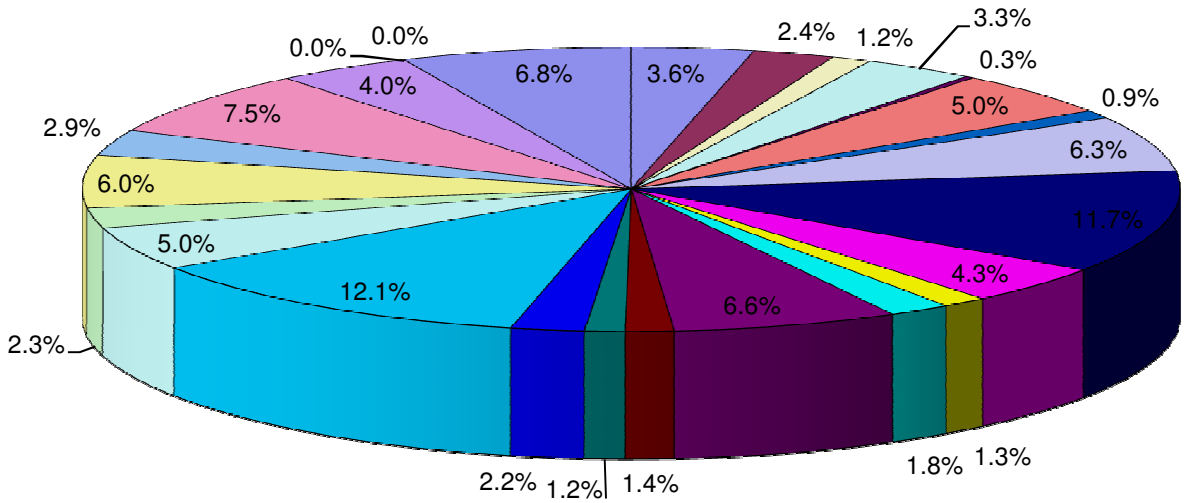
TASMANIA | Moonah

HEAVY VEHICLE PROVIDER MARKET SHARE

PERIOD 1 April 2013 TO 30 June 2013

Provider	Total	%
A Grade Motor School	225	3.6%
ACE Assessment & Training	150	2.4%
AGB Group Pty Ltd	73	1.2%
AHVDTC	206	3.3%
Anglesea Complex (NTIA)	16	0.3%
Armstrongs Driver Education	315	5.0%
Aust-Link Pty Ltd	59	0.9%
Barkly Driving School	394	6.3%
Bell Park Driving School Pty Ltd	731	11.7%
CITS	271	4.3%
COVE Training	83	1.3%
Deacon-Stewart	114	1.8%
DECA	415	6.6%
DTA	89	1.4%
Foresite	74	1.2%
JADS	135	2.2%
Journey Management	758	12.1%
NatAssess Pty Ltd	310	5.0%
Neils	142	2.3%
Paul Mont Driving School	374	6.0%
SWTA	183	2.9%
TDT	467	7.5%
TIDE	251	4.0%
VUT (No Longer Active)	0	0.0%
Wodonga (No Longer Active)	0	0.0%
Yugo Driving School	425	6.8%
Total	**6260**	**100.0%**

Heavy Vehicle Market Share April - June 2013

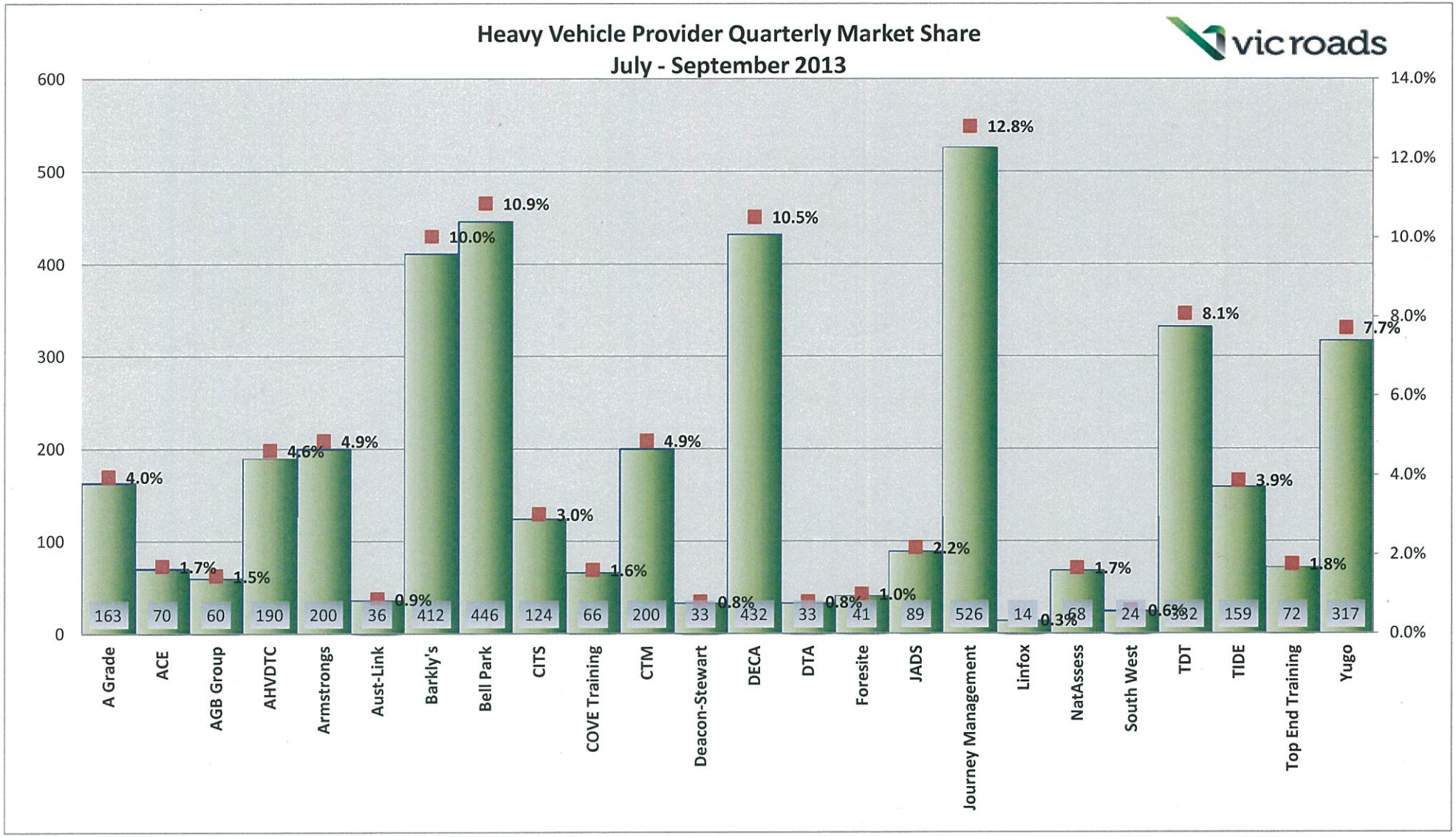


A Grade Motor School	ACE Assessment & Training	AGB Group Pty Ltd	AHVDTC
Anglesea Complex (NTIA)	Armstrongs Driver Education	Aust-Link Pty Ltd	Barkly Driving School
Bell Park Driving School Pty Ltd	CITS	COVE Training	Deacon-Stewart
DECA	DTA	Foresite	JADS
Journey Management	NatAssess Pty Ltd	Neils	Paul Mont Driving School
SWTA	TDT	TIDE	VUT (No Longer Active)

HEAVY VEHICLE PROVIDER QUARTERLY MARKET SHARE

PERIOD 1 July 2013 TO 30 September 2013

Provider	Total	%
A Grade	163	4.0%
ACE	70	1.7%
AGB Group	60	1.5%
AHVDTC	190	4.6%
Armstrongs	200	4.9%
Aust-Link	36	0.9%
Barkly's	412	10.0%
Bell Park	446	10.9%
CITS	124	3.0%
COVE Training	66	1.6%
CTM	200	4.9%
Deacon-Stewart	33	0.8%
DECA	432	10.5%
DTA	33	0.8%
Foresite	41	1.0%
JADS	89	2.2%
Journey Management	526	12.8%
Linfox	14	0.3%
NatAssess	68	1.7%
South West	24	0.6%
TDT	332	8.1%
TIDE	159	3.9%
Top End Training	72	1.8%
Yugo	317	7.7%
Total	**4107**	100.0%


Heavy Vehicle Provider Quarterly Market Share
July - September 2013
vicroads
600
500
400
300
200
100
0
14.0%
12.0%
10.0%
8.0%
6.0%
4.0%
2.0%
0.0%
A Grade 163 4.0%
ACE 70 1.7%
AGB Group 60 1.5%
AHVDTC 190 4.6%
Armstrongs 200 4.9%
Aust-Link 36 0.9%
Barkly's 412 10.0%
Bell Park 446 10.9%
CITS 124 3.0%
COVE Training 66 1.6%
CTM 200 4.9%
Deacon-Stewart 33 0.8%
DECA 432 10.5%
DTA 33 0.8%
Foresite 41 1.0%
JADS 89 2.2%
Journey Management 526 12.8%
Linfox 14 0.3%
NatAssess 68 1.7%
South West 24 0.6%
TDT 332 8.1%
TIDE 159 3.9%
Top End Training 72 1.8%
Yugo 317 7.7%

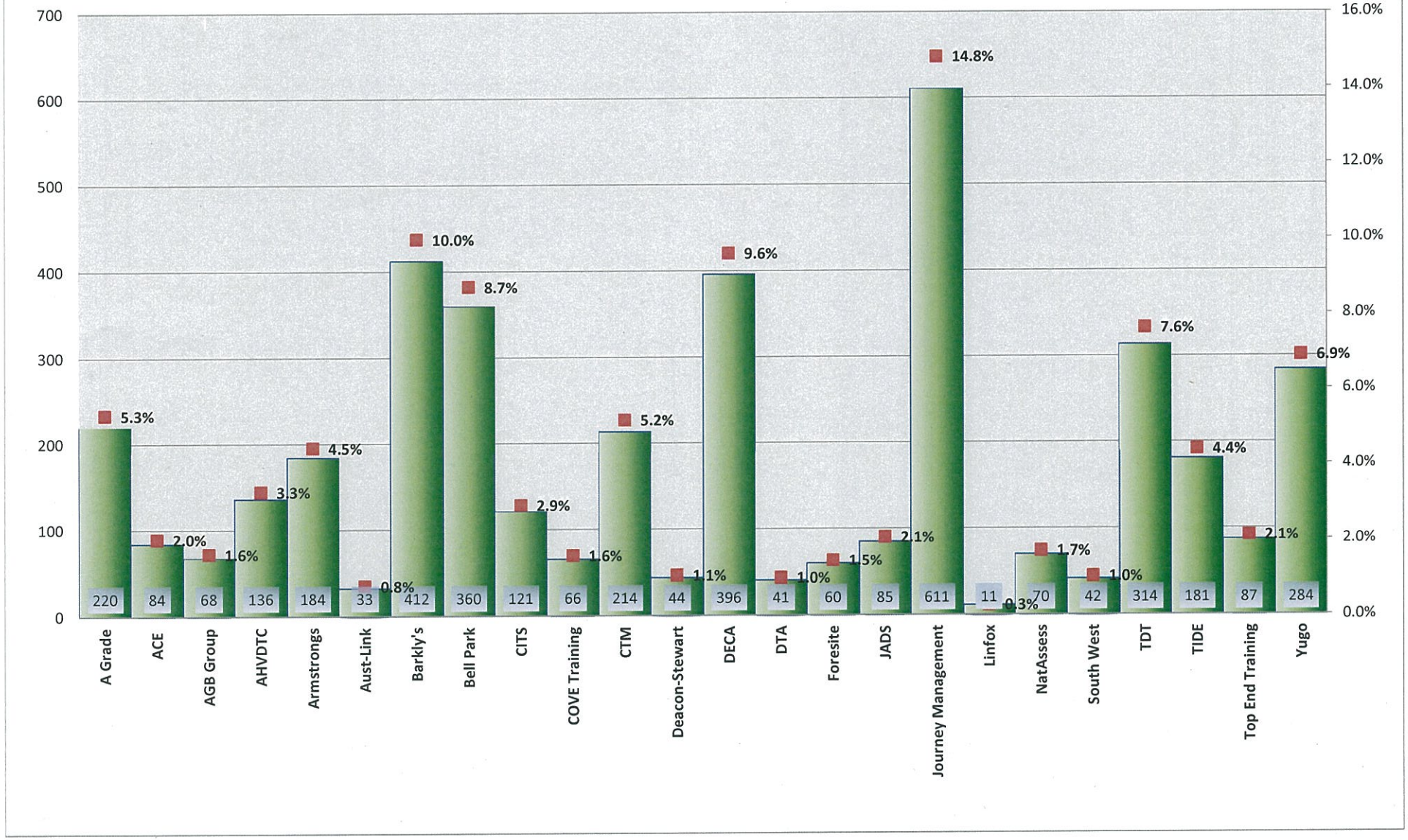
vicroads

HEAVY VEHICLE PROVIDER MARKET SHARE

PERIOD 1 October 2013 TO 31 December 2014

Provider	Total	%
A Grade	220	5.3%
ACE	84	2.0%
AGB Group	68	1.6%
AHVDTC	136	3.3%
Armstrongs	184	4.5%
Aust-Link	33	0.8%
Barkly's	412	10.0%
Bell Park	360	8.7%
CITS	121	2.9%
COVE Training	66	1.6%
CTM	214	5.2%
Deacon-Stewart	44	1.1%
DECA	396	9.6%
DTA	41	1.0%
Foresite	60	1.5%
JADS	85	2.1%
Journey Managem	611	14.8%
Linfox	11	0.3%
NatAssess	70	1.7%
South West	42	1.0%
TDT	314	7.6%
TIDE	181	4.4%
Top End Training	87	2.1%
Yugo	284	6.9%
Total	**4124**	**100%**

Heavy Vehicle Market Share Oct-Dec 2013



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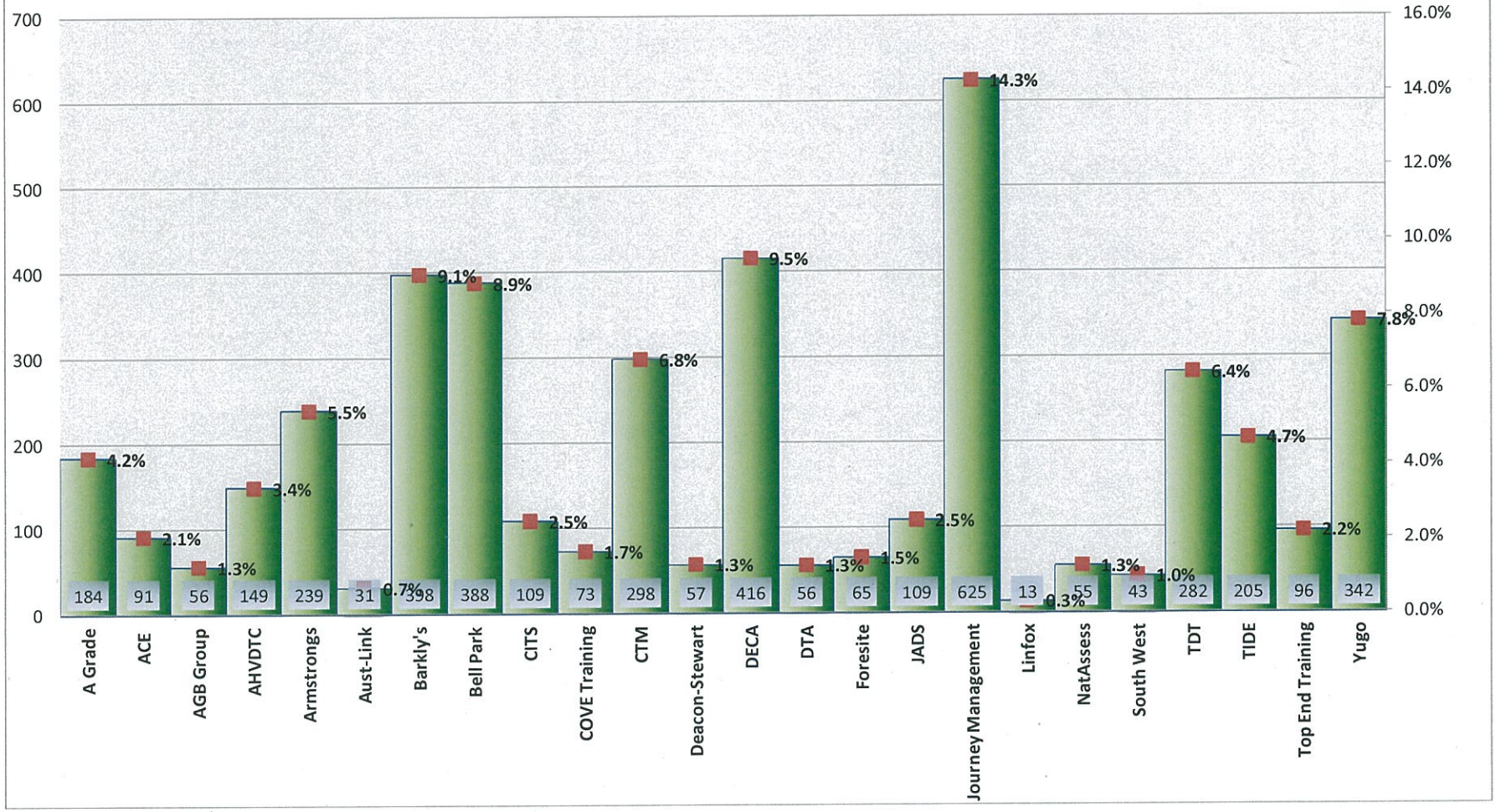
HEAVY VEHICLE PROVIDER MARKET SHARE

PERIOD 1 January 2014 TO 31 March 2014

Provider	Total	%
A Grade	184	4.2%
ACE	91	2.1%
AGB Group	56	1.3%
AHVDTC	149	3.4%
Armstrongs	239	5.5%
Aust-Link	31	0.7%
Barkly's	398	9.1%
Bell Park	388	8.9%
CITS	109	2.5%
COVE Training	73	1.7%
CTM	298	6.8%
Deacon-Stewart	57	1.3%
DECA	416	9.5%
DTA	56	1.3%
Foresite	65	1.5%
JADS	109	2.5%
Journey Management	625	14.3%
Linfox	13	0.3%
NatAssess	55	1.3%
South West	43	1.0%
TDT	282	6.4%
TIDE	205	4.7%
Top End Training	96	2.2%
Yugo	342	7.8%
Total	**4380**	**100.0%**

Heavy Vehicle Market Share Jan-Mar 2014



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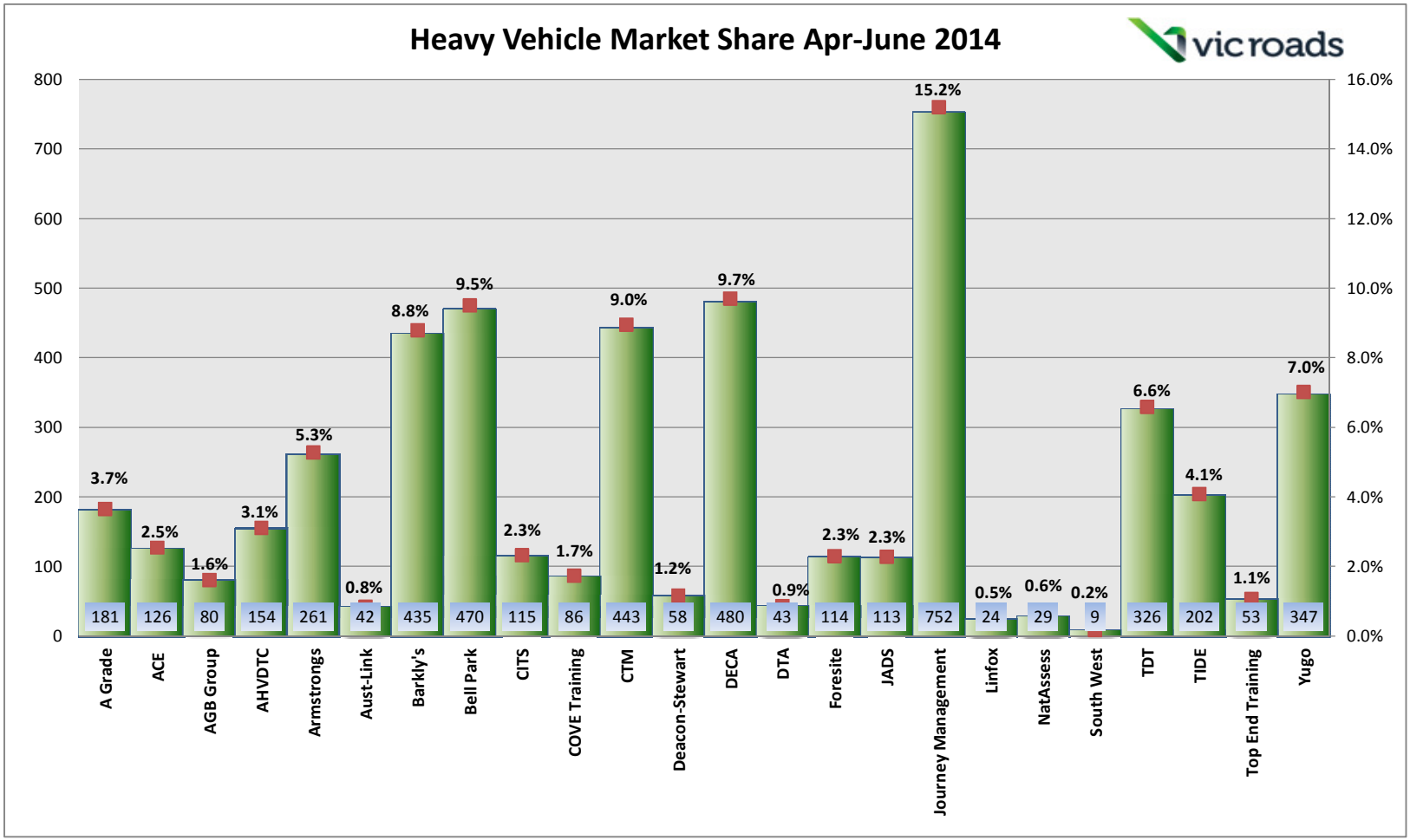
HEAVY VEHICLE PROVIDER MARKET SHARE

PERIOD 1 April 2014 TO 30 June 2014

Provider	Total	%
A Grade	181	3.7%
ACE	126	2.5%
AGB Group	80	1.6%
AHVDTC	154	3.1%
Armstrongs	261	5.3%
Aust-Link	42	0.8%
Barkly's	435	8.8%
Bell Park	470	9.5%
CITS	115	2.3%
COVE Training	86	1.7%
CTM	443	9.0%
Deacon-Stewart	58	1.2%
DECA	480	9.7%
DTA	43	0.9%
Foresite	114	2.3%
JADS	113	2.3%
Journey Management	752	15.2%
Linfox	24	0.5%
NatAssess	29	0.6%
South West	9	0.2%
TDT	326	6.6%
TIDE	202	4.1%
Top End Training	53	1.1%
Yugo	347	7.0%
Total	**4943**	**4943**


Heavy Vehicle Market Share Apr-June 2014
vicroads
800
700
600
500
400
300
200
100
0
16.0%
14.0%
12.0%
10.0%
8.0%
6.0%
4.0%
2.0%
0.0%
3.7%
2.5%
1.6%
3.1%
5.3%
0.8%
8.8%
9.5%
2.3%
1.7%
9.0%
1.2%
9.7%
0.9%
2.3%
2.3%
15.2%
0.5%
0.6%
0.2%
6.6%
4.1%
1.1%
7.0%
181
126
80
154
261
42
435
470
115
86
443
58
480
43
114
113
752
24
29
9
326
202
53
347
A Grade
ACE
AGB Group
AHVDTC
Armstrongs
Aust-Link
Barkly's
Bell Park
CITS
COVE Training
CTM
Deacon-Stewart
DECA
DTA
Foresite
JADS
Journey Management
Linfox
NatAssess
South West
TDT
TIDE
Top End Training
Yugo

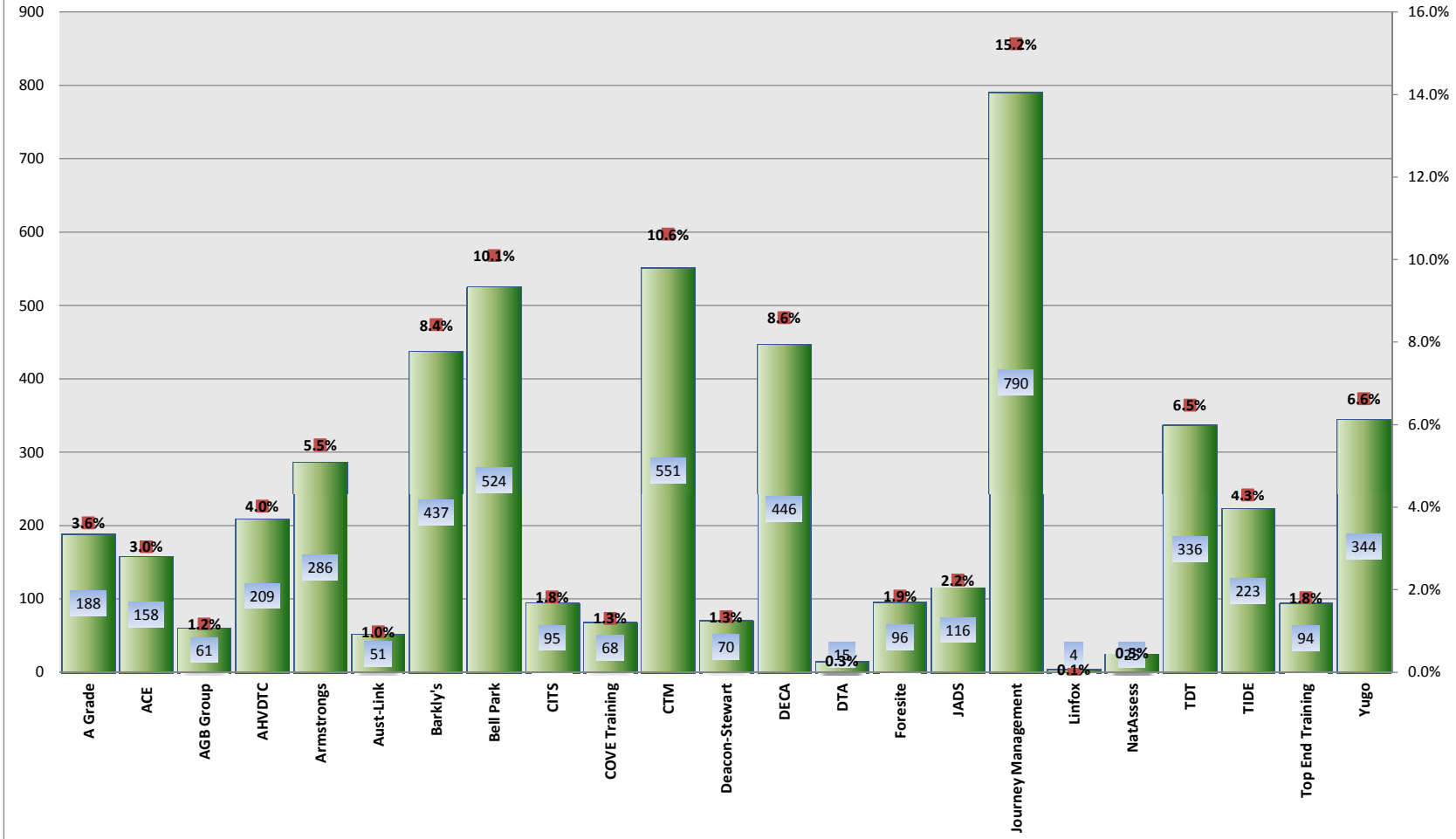
vicroads

HEAVY VEHICLE PROVIDER MARKET SHARE

PERIOD 1 July 2014 TO 30 Sept 2014

Provider	Total	%
A Grade	188	3.6%
ACE	158	3.0%
AGB Group	61	1.2%
AHVDTC	209	4.0%
Armstrongs	286	5.5%
Aust-Link	51	1.0%
Barkly's	437	8.4%
Bell Park	524	10.1%
CITS	95	1.8%
COVE Training	68	1.3%
CTM	551	10.6%
Deacon-Stewart	70	1.3%
DECA	446	8.6%
DTA	15	0.3%
Foresite	96	1.9%
JADS	116	2.2%
Journey Management	790	15.2%
Linfox	4	0.1%
NatAssess	25	0.5%
TDT	336	6.5%
TIDE	223	4.3%
Top End Training	94	1.8%
Yugo	344	6.6%
Total	**5187**	**100.0%**

Heavy Vehicle Market Share Jul-Sept 2014



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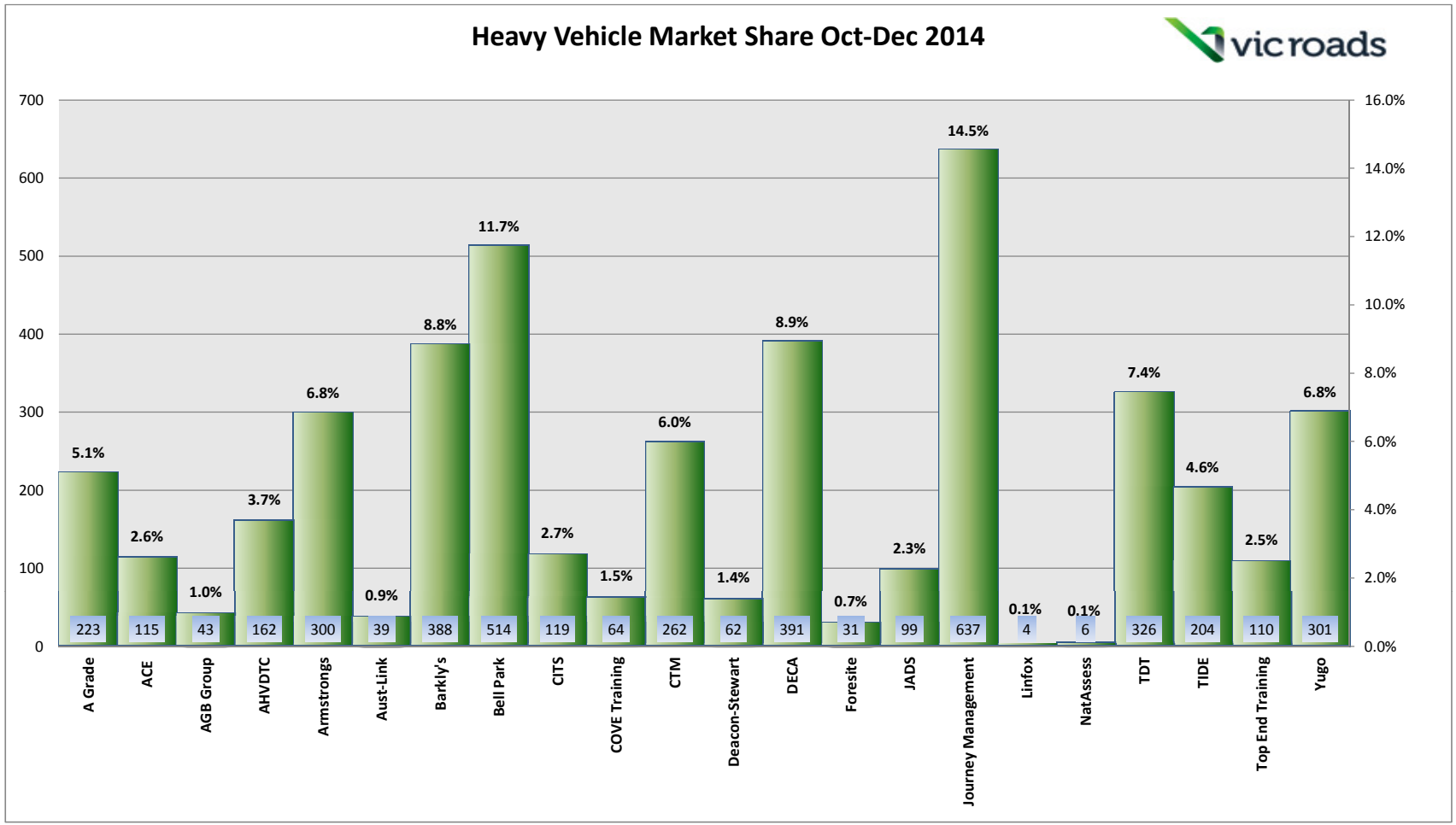
HEAVY VEHICLE PROVIDER MARKET SHARE

PERIOD 1 October 2014 TO 31 December 2014

Provider	Total	%
A Grade	223	5.1%
ACE	115	2.6%
AGB Group	43	1.0%
AHVDTC	162	3.7%
Armstrongs	300	6.8%
Aust-Link	39	0.9%
Barkly's	388	8.8%
Bell Park	514	11.7%
CITS	119	2.7%
COVE Training	64	1.5%
CTM	262	6.0%
Deacon-Stewart	62	1.4%
DECA	391	8.9%
Foresite	31	0.7%
JADS	99	2.3%
Journey Management	637	14.5%
Linfox	4	0.1%
NatAssess	6	0.1%
TDT	326	7.4%
TIDE	204	4.6%
Top End Training	110	2.5%
Yugo	301	6.8%
Total	**4400**	**100.0%**


Heavy Vehicle Market Share Oct-Dec 2014
vicroads
700
600
500
400
300
200
100
0
16.0%
14.0%
12.0%
10.0%
8.0%
6.0%
4.0%
2.0%
0.0%
5.1%
2.6%
1.0%
3.7%
6.8%
0.9%
8.8%
11.7%
2.7%
1.5%
6.0%
1.4%
8.9%
0.7%
2.3%
14.5%
0.1%
0.1%
7.4%
4.6%
2.5%
6.8%
223
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43
162
300
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388
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62
391
31
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637
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326
204
110
301
A Grade
ACE
AGB Group
AHVDTC
Armstrongs
Aust-Link
Barkly's
Bell Park
CITS
COVE Training
CTM
Deacon-Stewart
DECA
Foresite
JADS
Journey Management
Linfox
NatAssess
TDT
TIDE
Top End Training
Yugo

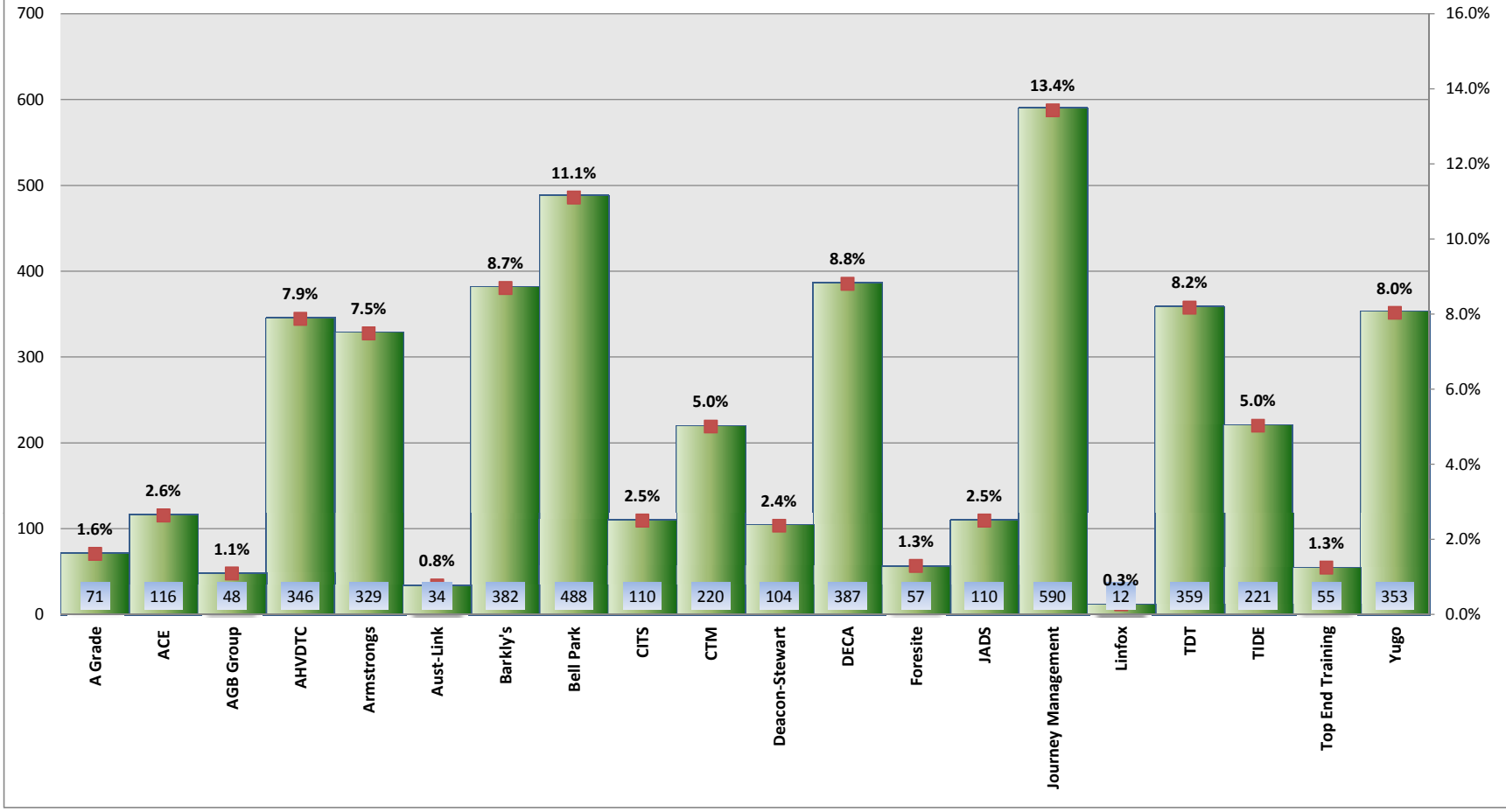
vicroads

HEAVY VEHICLE PROVIDER MARKET SHARE

PERIOD 1 January 2015 TO 31 March 2015

Provider	Total	%
A Grade	71	1.6%
ACE	116	2.6%
AGB Group	48	1.1%
AHVDTC	346	7.9%
Armstrongs	329	7.5%
Aust-Link	34	0.8%
Barkly's	382	8.7%
Bell Park	488	11.1%
CITS	110	2.5%
CTM	220	5.0%
Deacon-Stewart	104	2.4%
DECA	387	8.8%
Foresite	57	1.3%
JADS	110	2.5%
Journey Management	590	13.4%
Linfox	12	0.3%
TDT	359	8.2%
TIDE	221	5.0%
Top End Training	55	1.3%
Yugo	353	8.0%
Total	**4392**	**100.0%**

Heavy Vehicle Market Share Jan-Mar 2015



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HEAVY VEHICLE PROVIDER MARKET SHARE

PERIOD 1 April 2015 TO 30 June 2015

Provider	Total	%
ACE	126	2.7%
AGB Group	65	1.4%
AHVDTC	412	8.9%
Armstrongs	313	6.8%
Aust-Link	36	0.8%
Barkly's	417	9.0%
Bell Park	406	8.8%
CITS	123	2.7%
CTM	253	5.5%
Deacon-Stewart	75	1.6%
DECA	496	10.7%
Foresite	57	1.2%
JADS	98	2.1%
Journey Management	732	15.8%
Linfox	2	0.0%
TDT	360	7.8%
TIDE	211	4.6%
Top End Training	69	1.5%
Yugo	372	8.0%
Total	**4623**	**100.0%**

vicroads

HEAVY VEHICLE PROVIDER MARKET SHARE

PERIOD 1 July 2015 TO 30 Sept 2015

Provider	Total	%
ACE	149	3.1%
AGB Group	62	1.3%
Advanced Heavy	471	9.9%
Armstrongs	335	7.1%
Aust-Link	31	0.7%
Barkly's	451	9.5%
Bell Park	361	7.6%
CITS	118	2.5%
COVE Training	14	0.3%
TEC Training	218	4.6%
Deacon-Stewart	79	1.7%
DECA	474	10.0%
Foresite	63	1.3%
JADS	86	1.8%
Journey Management	790	16.6%
Linfox	4	0.1%
TDT	356	7.5%
TIDE	248	5.2%
Top End Training	62	1.3%
Yugo	377	7.9%
Total	**4749**	**100.0%**

vicroads

HEAVY VEHICLE PROVIDER MARKET SHARE

PERIOD 1 October 2015 TO 31 December 2015

Provider	Total	%
1 Stop Driving School	19	0.4%
ACE	240	5.5%
AGB Group	81	1.9%
Advanced Heavy	439	10.1%
Armstrongs	276	6.3%
Aust-Link	22	0.5%
Barkly's	418	9.6%
Bell Park	240	5.5%
CITS	87	2.0%
COVE Training	9	0.2%
TEC Training	160	3.7%
Deacon-Stewart	82	1.9%
DECA	415	9.5%
Foresite	63	1.4%
JADS	60	1.4%
Journey Management	779	17.8%
Linfox	6	0.1%
TDT	321	7.4%
TIDE	255	5.8%
Top End Training	60	1.4%
Yugo	334	7.7%
Total	**4366**	**100.0%**

VicRoads-Armstrongs/DECA Meeting

Date: 18th February 2016

Issue: Concerns with the following:

- Roads safety outcomes with current heavy vehicle license training & assessment practices
- Spiralling decline in the training standards and practices of VicRoads heavy vehicle accredited providers

Issues Currently Undermining Quality Training Outcomes by Accredited Providers

1 – Provider Management & Training

- Many accredited training providers are not operated by, or include training staff, who have the capabilities, understanding, or relevant qualifications to provide guidance and advice regarding the following areas of driver training:
    - Advanced heavy vehicle training methods (higher order training and assessment practices)
    - Advanced heavy vehicle driving techniques (risk minimisation)
    - Correctly appraising and measuring the skill level of heavy vehicle licence applicants at the on-set of their training and being able to recognise the skills and behaviours that indicate that applicant has achieved competency ("safe driver" status)
    - Mentoring and providing professional development to training staff (teaching trainers how to teach, how to mentor licensing applicants through lower order skills to higher order skills, and being able to correctly assess a license applicant's capacity to drive safely)

2 – Current Consumer Perceptions & Motivations

- A large percentage of heavy vehicle license applicants believe that by passing the VicRoads driver assessment they will have the capacity and skill to drive a heavy vehicle in a safe and controlled manner and that they would be ready to start work as a truck or bus driver immediately thereafter.
- The majority of heavy vehicle license applicants are solely focused on achieving licensing as quickly as possible. Consumers 'shop' for a heavy vehicle accredited provider based on length of course ('how little time they have to spend training') and cost of course ('how little do they have to spend to achieve a license) not on quality of training.
- As a result of heavy vehicle training not being standardised or having no minimum threshold based on either time behind-the-wheel or minimum skills covered, this has created a market place where accredited providers 'buy' market share (and therefore profit from) by providing heavy vehicle license training courses which deliver very little behind-the-wheel training and are designed to achieve high pass rates in accordance with what the market place wants.
- Heavy vehicle teaching and assessment practices are therefore aligned to market place wants, not VicRoads or road safety needs.
- Many of the trainers employed by accredited providers are former road transport workers. Although industry competency and currency can be highly beneficial, former road transport workers are often attracted to the heavy vehicle training industry because they are "sick of driving", believe that training will be 'easy' and are primarily seeking regular working hours - as opposed to actually wanting to become a driver trainer.
- It is apparent that some providers do not train and develop their Heavy vehicle driver trainers beyond knowing base assessment criteria requirements. As the competency of a licensing applicant is linked to trainer competency, such an approach ensures pass rates remain high and

the relationship between trainers and their clients are improved as the client perceives the trainer to be 'easy', 'not expecting much from the client' and a 'great guy'.

- There are approximately 132 driver skill areas (refer Appendix 2). License applicants need to be trained and development in all areas to varying degrees in order to give a heavy vehicle licensing applicant the capacity to drive and heavy vehicle in a safe manner.
- The VicRoads summative assessment covers approximately 54 driver skill areas (equating to approximately 42%). Of those areas covered, training is mainly focussed on low and mid order driver skills and techniques.
- Given that the amount behind-the-wheel training time is so limited in current course offerings, heavy vehicle training has become test run focused. License applicants are not exposed to high density urban areas or rural environments where a high level of heavy vehicle incidents and accidents occur.
- There appears to exist no research on heavy vehicle training and assessment supports and underpins heavy vehicle licensing policy development:
    - What are all the knowledge, skills and techniques a licensing applicant needs to learn to safely operate a heavy vehicle on our roads (Light Rigid to Multi-Combination)?
    - What are the average training timeframes required to achieve targeted base line skills and knowledge in order that for a licensing applicant to have the capacity to operate a heavy vehicle with minimal risk (including theory time, time behind-the-wheel, and assessment)?
    - What would be the best assessment model to verify a license applicant's capacity to drive safely (knowledge, skills and techniques)?

Potential Measures to Address Decline in heavy vehicle Training Standards

1 – Short Term

Time spent training can longer be left to providers to determine. VicRoads needs to intervene as soon as possible and set minimum training standards in order to arrest the continuing decline in heavy vehicle training standards and the 'race to the bottom' that the current unregulated training delivery space has given rise to by either:

• Setting considered minimum behind-the-wheel timeframes
• Setting considered minimum driver skill areas to be covered (which include mid to higher order skills) over a period of time

2 – Long Term

Any long term solution should be based on similar approach as was taken by VicRoads regarding the Motorcycle Graduated Licensing System (MGLS) being:

- An independent review should be conducted by university that has psychology, educational and assessment expertise. This will support and protect any changes that VicRoads may make in the future regarding its licence policy.
- A working group of expert trainers and decision-making managers (that have exposure to teaching and provider decision-making management) sourced from VicRoads accredited providers should be convened. Such a working group would serve to assist researchers to analyse what the minimum skills, knowledge, techniques and behaviours are required to be able to drive with minimise risk.
- Such a working group could also assist researchers develop curriculum and assessment tasks which are aligned to achieve any recommendations/results coming from any report. A provider working group will also assist in developing and delivering heavy vehicle training and assessment which is more closely aligned to the transport industry's needs – the end user of the heavy vehicle licensing regime.

- Develop specific training routes which expose applicants to both urban and rural driving environments.
- Put in place training frameworks and assessment systems that support organisations delivering quality outcomes.
- Set in place GPS tracking for each vehicle so as to better identify the following:
    - Time behind-the-wheel
    - Time as a passive observer (group learning)
    - Rapid deceleration measurement (heavy and late reactive braking)
    - Speed selection (hazard density)
    - Formative assessment tasks and aligned routes (GPS tracking and stamping)

Further Information

(1) In Victoria, truck related serious injuries/fatalities in Victoria was **315 (7.6%)** in the period, January 1 to the 31st of December 2015

Source: Phillip AIELLO Senior Constable 36973 Greensborough Highway Patrol (8432 0200)

(2) National Truck Accident Research Centre (NTARC) **2013 Report (Based on losses with a severity of $50,000 and greater)**

- "In 2015, we have safer vehicles, safer speeds, safer roads, and generally more responsive and safer behaviour. Nonetheless, heavy vehicle crash incidents continue to occur…" (Page 3).
- 2013 there were 7,500 crashes with trucks insured with NTI insurance company, 549 were serious over $50,000 point (Page 3, 5).
- 3.1 major accidents per '000 units insured (Page 5).
- Owner operators and small to medium business are over-represented in such incidents.
- Inappropriate speed for the prevailing conditions continued to be the predominate cause (P 7).
- Single vehicle accidents (SVA's) attribute to 71.8% of losses with the balance of 28.2% involving collisions with third party vehicles (P 7).
- Mechanical failures remained at a 5% crash incident level (72% tyre failure).
- **Most heavy vehicle major losses occur on this country's highways** (Page 16)
- 70% of drivers were over 40 years of age (P 23).
- One in three are over 55 years of age (P 23).
- In losses involving drivers aged 46-60, 21.4% had less than 10 years' experience (P 23).
- **Rigid trucks continue to grow in prominence in this market with their share of task now in the vicinity of 25% of freight carried (P 31)**
- Majority of large losses are in remote or regional areas (P 31).
- Driver error, particularly without trailing equipment accounts for a large proportion of losses (P 31).
- These drivers with 5 years or less experience, account for over 30% of the incidents (P 31).

Source: 2015 Major accident investigation report, covering major accidents in 2013. National Truck Accident Research Centre (NTARC). NTI report

(3) ATN Truck Magazine (December 2015)

Steve Shearer South Australian Road Transport Association (SARTA) executive director (Page 20)

- Heavy Rigid fatal crashes doubled over the last 12 months (29.4 percent) and 16 percent over the last 3 years

(4) International Direction to Heavy Vehicle Licensing standards (See Appendix 1)

USA legislation

The USA understands the importance of minimum behind the wheel training time for every person, in which they are legislating this year federally for all states to meet the following minimum requirements.

Class A: 40 hrs behind the wheel plus theory

Class B: 15 hrs behind the wheel plus theory

Behind-the-wheel (BTW) instruction (range and road):

Class A CDL trainees shall be required to receive a minimum of 30 hours of behind-the-wheel training with a minimum of 10 hours spent on a "range" (which may be any suitable area not on public roads); and 10 hours road or 10 road trips (no less than 50 minutes each). A 50-minute training session ("academic hour") shall count as one hour for purposes of this requirement.

Class B CDL trainees shall be required to receive a minimum of 15 hours of behind-the-wheel (range and road driving), with a minimum of 7 hours of road driving. Again, a 50-minute training session ("academic hour") shall count as one hour for purposes of this requirement.

(5) Armstrongs View of Current Industry Practices

The Heavy Vehicle Training Industry Providers are made up of the following people:

- Road safety focus outcome firstly while balance as best they can business viability (Decision makers that have expertise of setting internal driving standards to develop safer drivers that exceed the VicRoads minimum requirements. They fight hard to hold market share with longer training time frames).
- Road safety focus second to Business viability (Decision makers that know what is required to deliver better safety outcomes, but will drop training time frames to meet market competition survival).
- Business viability and profitability (Decision makers that will focus on the minimum outcome and work out ways to reduce training time and by market share to achieve dollar outcomes).

VicRoads Current Summative On Road Assessment

The current summative assessment is aligned and measured against low to mid-level assessment tasks (part and in full). Passing this assessment can be achieved by a person driving a heavy vehicle, significantly in the conscious realm with a basic skills and techniques, which the assessment does not measure unconscious competence in the higher order thinking and technique which is critical driving with minimal risk.

The current assessment allows providers to focus on delivering minimal training behind the wheel to achieve a pass outcome (giving clients what they want, quick and cheap). The unit of competence is very broad and at a low level, easy to achieve with minimal practical experience.

Even though every person is at a difference level and capacity, the concept of competency base training does not work in an environment that is built on minimum training time exposure. Industry can't operate in a competency environment, as the only reason people will do training is for the licensing. The will only do the minimum they have to meeting government requirements.

For this reason many in the industry that are business only focus, will work out ways around how to pass the test quickly, not teach the person how to drive safely. This allows the industry to develop and deliver minimum behind the wheel training in a pure behaviourist-teaching model (mimic what trainer does to pass their test & then once the person passes, they do what they want to do, safe or not safe, they wouldn't know).

Spiralling Industry Currently

From ADE analysis, there can only be 6 out of the 20 providers meeting the current VicRoads minimum testing standards as per detailed in the Appendix 3. Below is a table detailing the average loss of time in by undertaking every aspect required in a 1 day course. Please note, that on rare occasions, a learner comes along that has significant training with a transport company and could get through in 1 day plus the theory. In 30 years training in this industry, I would be lucking to count on one hand such a person with significant industry training behind them before licencing.

Providers delivering Heavy Rigid 1 day courses are supposed to train and assess a person in the following:

- Cabin drill (training, practice and assessment)
- Vehicle inspection (training, practice and assessment)
- Load security (training, practice and assessment)
- KT4 (training, practice and assessment)
- Reverse (training, practice and assessment)
- Drive (training, practice and assessment)

Most organisations have a standard day training day time frame: 7:30 to 4pm less lunch break 30 to 45 minutes (7:75 to 8 hours of potential training & assessment time)

Less the following:

Non Training Time	**Minutes**
Enrolment, LLN, paperwork & OHS induction	30
KT4 & correction	45
Load restraint and assessment	20
Walk to training vehicle	5
Vehicle inspection, cabin drill and assessment	30
Morning break including back and forward to the truck	20
Travel to and from vehicle for the lunch break	5
Afternoon break including back and forward to the truck	20
Reversing assessment, range set up and paperwork	20
Drive assessment, paperwork and COC issue	75
Total	270
Hours	4.5
Training time behind the wheel based on a 8 hour day	**3.5**

Appendix 1

USA Federal Minimum Standards

Federal Minimum Standards for CMV Entry-Level Driver Training
Written Statement
June 3, 2015

This Written Statement sets forth the key terms agreed upon by the Members of the Entry-Level Driver Training Advisory Committee (ELDTAC) on the establishment of nationwide minimum standards for the training of entry-level CMV drivers prior to taking their Commercial Driver's License (CDL) exam. Underlining indicates terms that cross-reference other sections of this Term Sheet.

Under the rules of procedure adopted by the ELDTAC in its first meeting, "consensus" is defined as "no more than 3 negative votes" with abstention not to be construed as a negative vote. The final package was adopted by a unanimous voice vote with no abstentions. All components within it were adopted by unanimous consent except as otherwise indicated in this Written Statement.

Agreed Key Terms of Proposed Rule:

1. Beginning on the effective date of the rule, no "Entry-Level Driver" as defined in Annex 11 (see below) may take a CDL skills test to receive a Class A CDL, Class B CDL, Passenger Bus endorsement, School Bus endorsement, or Hazmat endorsement unless he/she has satisfactorily completed a training program that (a) is provided by a Training Provider who appears on FMCSA's Training Provider Registry (see below), and (b) is appropriate to the license/endorsement for which such person is applying.

2. The curricula for such training approved by ELDTAC for Class A CDL, Class B CDL, Passenger Bus endorsement, School Bus endorsement, Hazmat endorsement and Refresher Course training, respectively, are set forth in the following annexes:

    a. **Annex 1** (Class A CDL)

    b. **Annex 2** (Class B CDL)

    c. **Annex 3** (Passenger Bus Endorsement)

    d. **Annex 4** (School Bus Endorsement

    e. **Annex 5** (Hazmat Endorsement)

    f. **Annex 6** (Refresher Course Training).

3. The ELDTAC-approved core curricula for Class A and Class B training programs generally sub-divide into (a) theory and (b) behind-the-wheel (BTW) segments, with BTW driving occurring either on a "range" (any protected area not involving a public road) and road segments.

    a. **Theory/knowledge instruction.**

    Theory may be taught either online or in a classroom. ELDTAC agreed not to prescribe the length of time to be spent on theory/knowledge instruction. The training provider must administer a written knowledge assessment which will provide a satisfactory litmus test of competence in this area of instruction.

    b. **Behind-the-wheel (BTW) instruction (range and road):**

    Class A CDL trainees shall be required to receive a minimum of 30 hours of behind-the-wheel training with a minimum of 10 hours spent on a "range" (which may be any suitable area not on public roads); and 10 hours road or 10 road trips (no less than 50 minutes each). A 50-minute training session ("academic hour") shall count as one hour for purposes of this requirement.

Vote: Consensus with 2 nay votes and no abstentions.

Class B CDL trainees shall be required to receive a minimum of 15 hours of behind-the-wheel (range and road driving), with a minimum of 7 hours of road driving. Again, a 50-minute training session ("academic hour") shall count as one hour for purposes of this requirement.

Vote: Consensus with 2 nay votes and no abstentions.[1]

4. These requirements apply to individuals who obtain the CLP on or after the compliance date. However, the new requirements will not apply to individuals – such as military veterans -- for whom 49 CFR 383 give States discretion to waive the CDL skills test. Any individual who fails to obtain the CDL within 360 days after obtaining a CLP will be required to complete a full ELDT course following application for a new CLP.

5. An individual holding a CDL that has been canceled, suspended or revoked – and is thus required to re-take a state-administered CDL exam -- shall not be required to re-take a full entry-level driver training course as a condition of taking such exam. However, any individual whose CDL has been canceled or revoked for a highway-safety related reason shall be required to complete refresher training from a provider listed on the Registry of Entry-Level Driver Training Providers prior to re-taking the state CDL exam to re-instate his or her CDL Class A or Class license. The required curriculum for such a course is contained in **Annex 5**. Once such refresher training is completed, the training certificate will be transmitted from the training provider to FMCSA, and the Agency will transmit the certificate to the SDLA via CDLIS. The rule will include an explicit requirement for SDLAs to administer a CDL skills test to these individuals, but only if there is an electronic training certificate on file with the SDLA.

6. To become a FMCSA-registered Training Provider a person or institution must meet the applicable FMCSA's Eligibility Requirements for Training Providers, and complete and submit (online) a Training Provider Identification Report affirming under penalties of perjury that such provider will teach the FMSCA-prescribed curriculum that is appropriate for that license or endorsement and that such provider meets the eligibility requirements. Training Providers that meet these requirements shall be placed on FMCSA's Training Provider Registry.

7. The Eligibility Requirements that Training Providers must meet in order to appear on the FMCSA Training Provider Registry are set forth in **Annex 7** (in-house or school training providers that train, or expect to train, more than 3 drivers per year), and **Annex 8** (small training providers that train, or expect to train, three or fewer drivers per year). The Training Provider Identification Form that all training providers must complete as part of their application for registration as an FMCSA Training Provider is set forth in **Annex 9**.

8. The ELDTAC agrees that theory and behind-the-wheel training can be delivered by separate providers. The FMCSA will assign separate responsibility to theory and behind-the-wheel trainers for the training of entry-level drivers, and the subsequent BTW training provider is not required to administer a written knowledge assessment. FMCSA will receive an electronic certification that a student has completed the theory portion,

[1] *Note:* The ELDTAC also gave extensive consideration to a "performance-only" option that would require Class A and Class B training providers to observe and document each student correctly performing each key driving skill in the FMCSA curriculum 5 times for Class A drivers (fewer times in the case of Class B), and provide written documentation of such performance in a Master Trip Sheet (**Annex 12**) or some comparable document.

Some stakeholders favored *adding* this "enhanced performance assessment" option to a minimum hours-of-BTW-training requirement. Others favored this option *in lieu of* a minimum hours-of-BTW-training requirement.

In the end, the ELDTAC decided not to adopt this option -- either in addition to, or in lieu of, a minimum hours-of-BTW-training requirement. Instead, the ELDTAC agreed to recommend: (1) requiring the above-mentioned minimum of BTW-training hours for training providers teaching Class A and Class B curriculums; (2) requiring that such training providers create and maintain documentation of training covering the prescribed BTW curriculum; and (3) offering the example of a Master Trip sheet based on **Annex 12** as an illustrative method by which trainers may document their training.

hold it in a queue in the Registry, and not transmit to the State Licensing Agency until the behind-the-wheel portion is submitted.

9. FMCSA's draft regulatory text setting forth the general requirements for training providers appearing in FMCSA's National Registry of Training Providers is set forth in **Annex 10**.

10. This rule shall take effect 3 years from the date of the publication of the final rule in the Federal Register.

VicRoads Assessment Task Numbers	54	VicRoads Percentage (Full)	22%
Full list of skills, techniques and driving frameworks tasks	132	VicRoads Percentage (Part)	80%
		VicRoads Percentage (Part & Full)	41%

Sess #	#	Skills & Technique list (Safe Heavy Rigid Synchromesh Truck Driver)	Low order task	Med Level	High Level Task	VR #	VR Part Ass	VR Full Ass	Training Time Frame D1	D2	D3	D4	D5	D6	D7	D8	D9	D 10
1	1	OHS (knowledge of PPE, safe pedestrian movement around vehicles & identification of vehicles blind spots including mirror limitations)		1					1									
	2	Guiding reversing vehicle (where to stand, hand signals & danger zone identification)		1														
2	3	Pre-Drive Inspection (truck)	1			1		1	0.5	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25
	4	Pre-Drive Inspection (trailer)	1			1		1										
	5	Load (identification, position, legal weight, security & dangerous goods identification)		1														
3	6	Entry and Exit Vehicle (3 points of contact)	1			1		1	1	1	0.5							
	7	Cabin Drill - Controls and instrument identification	1			1		1										
	8	Correct seat alignment - distance & angles	1															
	9	Foot alignment -clutch, brake and throttle	1															
	10	Correct operation of gearstick (hold technique with palm)	1															
	11	Apply and release park brake (maxi-brake)	1			1		1										
	12	Apply and release trailer brakes (maxi-brake)	1			1		1										
	13	Starting motor (Non-Electronic motor)	1			1	1											
	14	Starting motor (Electronic motor)	1			1	1											
	15	Take off Electronic Motors	1			1	1											
	16	Take off Non-Electronic Motors	1			1	1											
	17	Gear selection & take off automatic gearbox	1			1	1											
	18	Braking squeeze technique (airbrakes)	1			1	1											
	19	Braking squeeze techniques (hydraulic brakes)	1			1	1											
	20	Braking to stop (below 10 kmp/h)	1			1	1											
4	21	Gear change up synchromesh		1		1	1											
	22	Braking to stop above 10 kmp/h	1			1	1											
	23	Take off uphill (Use of park brake)		1		1	1											
5	24	Steering technique, hand over hand, pull push (no sliding)	1	0		0	0		1.5	0.5	0.5	0.25						0.25
	25	Left turn unlaned (approach-during-exit position, signal knowledge, 2 x 180 degree scans at intersection, approach-during-exit mirrors and give way)	0	1		1	1											
	26	Right turn narrow unlaned road (approach-during-exit position, signal knowledge, 2 x 180 degree scans at intersection, approach-during-exit mirrors and give way)	0	1		1	1											
	27	Right turn wide unlaned road (approach-during-exit position, signal knowledge, approach-during-exit mirrors and give way)	0	1		1	1											
6		Gear Change Down synchro							0.5	0.5	0.25	0.25						0.5
	28	Gear change synchro (moderate incline)		1		1	1											
	29	Gear change synchro (moderate decline)		1		1	1											
	30	Take off down-hill, including higher gear selection (moderate decline)		1		0	0											
	31	Left turn (Laned to unlaned road)		1		1	1	0	1.5	1	0.5	0.5						
	32	Diverging base technique (mirror use, speed selection, signal knowledge, safe gap selection in mirrors, scanning technique between forward and mirrors & lane tracking before movement)		1		1	1											
	33	Right turn (Laned to unlaned road)		1		1	1											
8	34	Gear change down moderate incline (synchro)		1		1	1			0.25	0.25	0.25	0					
	35	Gear change down moderate decline (synchro)		1		1	1											
9	36	Roundabout straight unlaned		1		1	1			1	0.5	0.5	0.5					
	37	Roundabout left turn unlaned		1		1	1											
	38	Roundabout right turn unlaned	0	1		1	1											
10	39	Use of peripheral vision		1						0.5	0.75	0.5	0.5	0.5				
	40	Keep your eyes moving		1														
	41	Blind spots in the eyes (head/chin position, technique to remove, mind scanning		1														

		techniques at intersections)																			
	42	Removal of vision block out in the vehicle (A & B pillars and the use of body movement and leaning forward to increase mirror width)		1																	
	43	High and low aim steering techniques (during turns)		1																	
	44	High and low aim steering techniques (mental schema's techniques)		1																	
	45	Forward scanning (short, mid and long range attention allocation technique)		1																	
	46	Observation of gauges		1																	
11	47	Left turn (Single to Multi-Lane)		1		1	1														
	48	Right turn (Single to Multi-Lane)		1		1	1														
	49	Left turn (Multi to Multi-Lane)		1		1	1														
	50	Right turn (Multi to Multi-Lane)		1		1	1														
12	51	Roundabout straight (Multi -lane)		1		1	1														
	52	Roundabout left turn (Single lane to multi -lane)		1		1	1														
	53	Roundabout left turn (Multi-lane to multi -lane)		1		1	1														
	54	Roundabout right turn (Single lane to multi -lane)		1		1	1														
13	55	System of vehicle control		1																	
	56	Miss and recover gear flat roads (synchro)		1																	
	57	Miss and recover gear moderate incline (synchro)		1																	
	58	Miss and recover gear moderate decline (synchro)		1																	
	59	High speed braking rapid deceleration focusing on stopping quickly (protecting passenger and/or load)		1																	
14	60	Skip shifting (Up gears) Synchro or non-synchro (eco driving)		1																	
	61	Skip shifting (Down gears) Synchro or non-synchro (eco driving)		1		0															
15	62	Left turn slip lanes		1		0	0														
	63	Left turn traffic lights (no arrows)		1		1	1														
	64	Right turn traffic lights (no arrows)		1		1	1														
	65	Right turn traffic lights (Controlled by arrows)		1		1	1														
16	66	Kerb side stops - Safe position selection, safe approach speed, correct mirror use, signal knowledge, use of hazard lights & no striking trees, poles, kerb, signs or buildings		1		1		1													
	67	Kerb side stops - exit, internal and external mirrors, legal signal requirements, removal of blind spots and safe gap selection, cancel of signal once diverging is completed.		1		1		1													
	68	Tram Crossing		1																	
	69	Stop signs		1		1	1														
	70	Pedestrian Crossing		1																	
	71	School crossing		1																	
	72	Railway crossing - Controlled and uncontrolled		1																	
	73	Hazard height identification (trees, low bridges etc.)		1																	
17	74	Lane position selection unlaned (narrow road)		1																	
	75	Lane position selection unlaned (wide road)		1																	
	76	Lane selection - 2 lane with centre white line		1		0	0														
	77	Lane selection - 2 or more lanes with centre reservation (Speed limit below 80 kmp/h)		1																	
	78	Lane selection - 2 or more lanes with centre reservation (Speed limit above 80 kmp/h)		1																	
18	79	Speed selection - zone identification		1	0	1		1													
	80	Speed selection hazard density			1																
	81	Space Cushion (forward 4-7 sec min)			1	1		1													
	82	Space Cushion (Left side)		1		1	1														
	83	Space Cushion (Right side)		1		1	1														
	84	Space Cushion (Behind with forward gap adjustment if required)			1																
19	85	Merging		1		1	1	0													
	86	Entering Freeways - (Speed selection, signal knowledge, body movement to remove blind spots, gap selection forward, rear and side)		1		1	1														
	87	Freeway travel (Speed scatter identification and adjustment & lane selection and control of 360 degree space cushion protection)		1		1	1														

	88	Freeway exit (Mirror use, route planning, speed selection on freeway and exit ramp, signal knowledge and space cushion protection)		1		1	1	0													
20	89	12 second forward planning technique (position selection hazard approach)			1											2	1.5	1			
	90	Hazard approach prioritisation based on impact zones			1																
	91	4 second hazard approach rule (cover brake)			1		1														
	92	Identify your emergency escape route (Smith system - leave yourself an out)			1																
	93	Make sure that you are visible to other road users (use of horn, lights or change of vehicle position)			1																
21	94	System of decision making			1												1				
22	95	Emergency braking - Threshold technique			1												0.5	0.5			
	96	Low air - stopping safely		1																	
	97	50% brake rule - proactive not reactive braking on hazards approach			1													1			
23	98	Use of engine retarders - Jake brakes, gear or exhaust retarders		1																	
	99	Leaving and re-entering the shoulder of the road (bitumen to gravel)			1																
24	100	High speed cornering bend - Sign, bend sharpness and camber identification (positive, negative or crown)		1																	
	101	High speed cornering bend - Speed & gear selection, approach, during and exit		1																	
	102	High speed cornering bend - Cornering line, approach, during and exit including hand technique		1																	
25	103	Approach crest of hills		1	0													3			
	104	Approach to signal lane bridges		1																	
	105	Selection lanes incline - high speed bends multi lanes			1																
	106	Steep hill decline - Gear & speed selection and location before decline		1																	
	107	Steep hill decline - Speed control down incline (brake overheating protection		1																	
	108	Steep inclines - gear change down synchro split gear		1																	
	109	Steep inclines - gear change down synchro full gear		1																	
	110	Steep inclines - gear change down missed gear synchro (recovery technique)		1																	
26	111	Overtaking - following distance and road position selection to maximise 360 degree observation		1																0.75	
	112	Overtaking - Safe gap selection, decision based on legal speed, no single solid lines, no road blind spots, selection of appropriate gear, acceleration and torque of the vehicle appropriate to complete manoeuvre.		1																	
	113	Overtaking - Safe gap selection, use of horn if required, mirrors, signals, speed selection, vehicle & load stability, space cushion when overtaking, and safe gap selection for return.																			
27	114	Gravel roads - speed selection to avoid road skipping		1															3		
	115	Gravel roads - space cushion selection to maximise forward vision from dust and flying objects			1																
	116	Gravel road - speed reduction and positon selection to avoid oncoming vehicle accident on narrow roads			1																
	117	Gravel road - cornering bend - Sign, bend sharpness and camber identification (positive, negative or crown)			1																
	118	Gravel road cornering bend - Speed & gear selection, approach, during and exit		1	0																
	119	Gravel road cornering bend - Cornering line, approach, during and exit including hand technique		1																	
28	120	Night driving - speed selection hazard density and night vision		0	1														3	0.5	
	121	Night driving - use of low and high beam (dipping location and hazards identification between your vehicle and the oncoming vehicle)		1																	
	122	Night driving - use of high beam to identify hazards between vehicles			1																
	123	Night driving - Scanning techniques to overcome high beam dazzle from the on-coming vehicle			1																
29	124	Reversing - straight line	1			1		1	0.5	0.5										0.5	
	125	Reversing off set left		1		1		1													
	126	Reversing off set right		1		0															
	127	Reversing into driveways (left and right side)		1												0.75					
	128	Reversing around corners (left corner)		1											0.5						

	129	Backing into a loading dock		1										0.5						
30	130	Emergency Swerving Technique (load stability control)			1															
	131	Brake downs - set up of triangles	1																	
	132	Post trip inspection - Safety and roadworthiness	1															0.25	0.25	
		Total Numbers of skills/knowledge set	**22**	**89**	**20**	**54**	**43**	**12**	6.75	6.75	7.25	7	7.25	8	7.5	7	7.5	3.5
		Percentage	**17%**	**67%**	**15%**	**41%**	**80%**	**22%**										

							Total min hrs
VicRoads Summative assessment	5.75	5.25	4.5	1.75			17.25
Safe competent driver	6.75	6.75	7.25	7	7.25	8	7.5	7	7.5	3.5	68.5

Sess #	**Number**	**Theory list (Competent Heavy Rigid Truck Driver)**	**Low order task**	**Medium Level**	**High Level Task**	**VicRoads number**	**VicRoads Part Ass**	**VicRoads Full Assessment**
	141	Front wheel skids - (under steer) regaining control			1			
	142	Rear wheel skids - (over steer) regaining control			1			
	143	Four wheel skids - (regaining control)			1			

Source	**A framework for Driver Education 3rd edition (An essential Guide for the production of driver education programs and assessment systems), RTA New South Wales 1997**
Source	**Professional Skills for driving trucks. Tranzqual ITO, Transport & Logistics Industry Skills Council LTD (2009)**
Source	**Craig Nicholson research and trials over 30 years of teaching and management of heavy vehicle training / assessment.**

Please note that numbers may have some variation, depending on training environment the student is exposed too and interpretation of VicRoads assessment criteria.

Appendix 3

Provider	HR Synchromesh	Course hours	Loss of time to complete all enrolment, cab drill, vehicle inspection and load security and theory testing	Loss of time when due to practical testing & breaks	Total training time behind the wheel
Armstrongs Driver Education Pty Ltd (ADE)					
One-on-one (fee for service)	2 Days (1.5 Days Driving, 1/2 Day Classroom)	15	3	2	9
DECA Training					
One-on-one (fee for service)	12 Hours	12	3	2	7
ACE Assessment and Training Services					
One-on-one (fee for service)	2 Days (16 hours)	16	3	2	11
Deacon Stewart Specialist Training Pty Ltd					
Test Only (fee for service)	**Test Only, no training**				2.5
TEC Training Solutions					
One-on-one (fee for service)	1 Day (.5 theory, .5 practical)	8	3	2	3
Journey Management Pty Ltd					
One-on-one (fee for service)	1 Day	8	3	2	3
Transport Driver Training (TDT)					
One-on-one (fee for service)	8 hours	8	3	2	3
Construction Industry Training Services (CITS)					
One-on-one (fee for service)	1-1.5 Days	12	3	2	7
Aust-Link Pty Ltd					
One-on-one (fee for service)	Up to 2 Days	12	3	2	7
Barklys Driving School					
One-on-one (fee for service)	1 Day	8	3	2	3
Advanced Heavy Vehicle Training Centre					
One-on-one (fee for service)	1 Day	8	3	2	3
Transport Industry Driver Education (TIDE)					
One-on-one (fee for service)	8 hours - 1 Day plus KT4 test	9	3	2	4
Yugo Driving School					
One-on-one (fee for service)	10 Hours	10	3	2	5
AGB Group					
One-on-one (fee for service)	1 Day	8	3	2	3
Bell Park Driving School					
One-on-one (fee for service)	1 Day + 1 hour on a day prior for theory test	9	3	2	4
Linfox					
One-on-one					?
Top End Training					
One-on-one					?
Centre of Vocational Education (COVE)					
One-on-one	1-1.5 Days	12	3	2	7
Foresite Training Pty Ltd					
One-on-one	1 Day	8	3	2	3

1 Stop Driving School					
One-on-one	1.5 Days including assessment	12	3	2	7