



**Submission to Senate Standing Committee on
Rural & Regional Affairs and Transport**

Concerning Item (d) in the Terms of Reference

**“The training and Career Pathways to Support,
Develop and Sustain the Road Transport
Industry”**

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Submission Notes

Our submission only addresses Topic (d) intentionally. Whilst we are aware and informed of the many and varied aspects of the inquiry, there are other parties that are more able to address these as it is their area of expertise.

We have chosen to centre our Submission on the licensing and pathway of a Road Transport career.

This paper was created following internal discussion within the ADTA board combined with input from (externally) RTO managers, HVCBA practitioners and other stakeholders within industry including transport companies and Transport Representative Associations

Preface

The Australian Driver Trainers Association (ADTA) is the peak representative body for practitioners of driver education in Australia.

Following the merger of ADTA Q with ADTA (NSW) and the annexure of the now defunct ADTA N.T, a single entity, ADTA, was formed. With approximately 1200 members from Merimbula in the South of NSW up to Port Douglas in Nth QLD and all points in between. This includes inland to Broken Hill, Longreach and Moranbah and a strong contingent in Darwin, Katherine, Tennant Creek and Alice Springs.

Our membership base includes Car, Truck, B-Double, Plant and Equipment instructors and RTO's.

The organisation has 10 Director positions that are currently filled by six car instructors, three HV trainer / assessors and an RTO manager.

The ADTA has a general manager responsible for day to day issues and running the business side of the association as well as organising all forms of member engagement. There is also an administration and membership co-ordinator as well as a part time employee that manages the administration of various projects.

Our key role is the provision of services to members as well as a big focus on the professional development of the industry. This has included well in excess of 20 workshops for instructors run over the past membership year.

The issues at hand

- A disjointed national approach to licensing
- Standards in the VET sector
- Inadequate education, both for applicant and instructor
- Driver shortages, losing drivers because of process

1. A disjointed national approach to licensing

Currently we see the approach to licensing is varied on a state by state basis. This is due, in no small part, to the geographical constraints in various regions across the country.

The national framework, which has been agreed by all state regulators as the way forward, does set some strong guidelines for requirements that need to be met in order to demonstrate competence in line with the necessary Unit of Competency.

In NSW and Vic this is quite achievable in relatively close proximity to all metro and many regional areas. In QLD this gets harder with only the coastal cities able to comply and in the other states very limited ability to fully comply with the requirements outside of the big cities.

Tasmania is fortunate that there is little impost for travelling to undertake courses.

It is largely for access reasons that only Vic and NSW (with Tas currently implementing) have adopted the National Framework for delivery in their states. All states will, however, accept certificates issued by providers working under a deed in their home state.

Currently in QLD the regulator (TMR) conduct their own driver testing up to Class HC with MC licenses offered by RTO's that hold a deed with TMR. The TMR driving test is between 60 and 90 minutes in duration with a testing officer who may or may not have any truck driving experience. The only requirement is that they hold a license for 1 year.

In NSW a Competency Based Assessment (HVCBA) scheme has been operating since 1994. In 2013 this scheme was brought into the VET sector requiring contracts be only held by RTO's.

It is worrying that in NSW driving tests are also conducted by Service NSW using staff that simply must "hold" that class of license. We have seen numerous examples of staff being upgraded to a class HR license and two

weeks later testing in that class having achieved absolutely no on-road truck driving experience other than the process of passing their own test.

Standards in the VET sector

From the outset, the introduction of the National License Assessment scheme has been somewhat diluted. State regulators are looking to the National Skills Regulator (ASQA) as an “oversight and monitoring” body. Whilst only RTO’s can get delivery agreements, there is no requirement that a unit of competency must be issued. This means that ASQA has no Authority whatsoever in monitoring or auditing license outcomes. Essentially license assessments sit in a bizarre no mans land.

Historically records kept by a Driving School business included the training and assessment notes, assessment records, test scores and applicant documentation.

As of Jan 1, 2013, these records contain one sheet of information to comply with the Driving Instructors Act; name, address, class, vehicle info and lesson dates.

If we were working in the VET space, records of VET qualifications issued, training and assessment strategies used, syllabus, knowledge questions and other firm evidence of the qualification would all be kept and be auditable.

The ASQA records, if found deficient or in non compliance lead to sanctions against the RTO or possibly even cancellation of their status.

However, despite the RMS at the time stating all licenses MUST be accompanied by a Statement of Attainment for the Unit of Competency the stance Circa 2015 changed and it was decided the Unit was not a compulsory requirement.

Following the RMS changing that requirement that we work in the VET space and allowing the training to be unaccredited by national standards, the RMS will not be interested as they look to RTO’s which are required to “Self Audit and Self Regulate”.

This means that questionable RTO’s continue to operate without any external auditing or guidance regarding the files that are kept outside of the VET space.

The financial arrangement that exists between some RTO managers and contract assessors is troublesome and has already demonstrated severe conflicts of interests insomuch as RTO’s turn a “blind eye” to alleged misconduct for fear of losing an income stream.

Applicant and Assessor Skills

New drivers are being “churned” out of driving schools in as little as half a day. This includes drivers of B-Doubles. I have spoken to a number of QLD license applicants that have upgraded from Class HR to MC in a group of three applicants in 5 hours...for the lot. A worrying worrying outcome.

We see groups of applicants that aren't equipped to be put onto the road. Some of the shortfalls and issues that I have had put to me include;

- Grossly insufficient training times (Cost driven)
- Non compliance with video and assessor separation requirements
- Unladen / under-laden training vehicles
- Vehicles used being non representative of the license class

The pool of assessors is becoming polarized, more and more noticeably.

Group A are committed road safety professionals that are providing high quality education to students genuinely wanting to enter the road transport profession. They are supported by an RTO that has a good understanding of the industry or has good staff within the RTO that offer this support.

They have good premises, administrative support and vehicles of an industry standard. This would be the norm IF the assessment task had remained in the VET sector.

Group B are people who probably share a deep desire to produce good drivers but are not equipped in sound methodology to do this. The RTO they are working under is not supplying the required education and support nor the needed training to work in this space.

They run fleets of old technology trucks and every client is assessed in the absolute minimum time to the bare bones level. These assessors generally struggle to even measure / determine competence.

The RMS ran a well presented assessor training course up until 2013. This ensured all assessors, upon completion of the course and the post course assessment, were reasonably on the same page and very careful to follow policy and procedure.

There is now NO TRAINING from the regulators for industry assessors.

The internal RTO induction that we see today is inconsistent, insufficient and in some cases invisible. These assessors are then placed into the marketplace with neither a VET nor a moral compass to compete with businesses that are doing the right thing.

Sadly, some RTO's see them as a shiny new "Cost Centre" and will allow them to trade under them at minimal risk, knowing that the files for the clients these assessors create will be going straight into non auditable / non accountable Filing Cabinet.

The financial interest between RTO's and assessors needs scrutiny. Many RTO's offer no auditing, no professional development and no support. If we were back in the VET space they would be 100% required to offer this support under their agreement with ASQA

Driver shortages and bad process

There is a driver shortage, this is a simple statement of fact. Young people are being turned away from the industry due to the convoluted nature of the process to become a driver.

To draw a (tentative) parallel we see young people spending >\$100k and 14 months to become the first officer in a regional turboprop aircraft. Starting on a salary of less than a B-Double driver.

Putting a time of only 5 or 6 hours on the process of upgrading licensing is dangerous, insufficient and threatening to the general travelling public that shares the road.

The other elephant in this room is that we still use an antiquated system of "License Tenure" in this country to authorise upgrading and career development.

Personally, I've had many clients over the years that have met tenure requirement (held a license for a prescribed period of time) but has developed no skills, experience or knowledge of the task. Conversely, I've also struck clients (maybe a yard person in a transport company) that has developed all of the aforementioned qualities but is unable to upgrade a license and subsequently firm up and make a career based on merit, not "time"

Recommendation / Summary

1. Austroads develop and set a curriculum for the process of upgrading a license with expanded skills that reflect the task to be performed after obtaining new and upgraded qualifications.
2. A reasonable time frame to allow for skills development accompany the curriculum.
3. The concept of “tenure” be removed and a meaningful and relevant measure of both experience and skill be substituted and reinforced by provision of evidence of relevant industry experience.
4. The the state regulators not be permitted to conduct Heavy Vehicle license assessments unless the regulator staff meet all the requirements of VET assessors
5. That the scheme be fully immersed into, or fully removed from, the VET space.