

NATIONAL DRIVER WORK DIARY

Comments on Draft

With reduced requirements for entries, along with more information on completing the Work Diary, particularly how work hours are counted, the proposed revisions to the Work Diary are a good step forward.

There are some points which I would like to raise for review, and some suggestions for improvement.

On page 7, under the heading **“driver fatigue laws apply to drivers of the following heavy vehicles:”**

Point 2, may be clearer if it read as follows, “a vehicle combination, if adding the GVM of each vehicle in the combination gives a total GCM of more than 12 tonnes.

Reasoning – GCM is a well known term in the industry and more correctly reflects the intent.

Page 8 – ambiguity of whether to show work or rest time when stopped by Authorised officer, suggest a comment along the lines, that it generally be considered as work time unless driver is not interacting with the officer or vehicle for a period greater than 15 minutes, as specified in legislation. (ie resting)

Page 8 – Split Rest under BFM. Suggest some possible examples of what would be considered a defence and what would not be. Eg stock crate pulled up beside whilst on major rest break, OK to have split rest break to move away from noise and smell.

Page 9 – In the example where “ Steve start work” It says that time only needs to be shown from Midnight at the start of that day. Previously, it was a requirement to show all work time since last major break. For example, if he had worked from 9pm until 11:30pm the previous night, then started again at 4am, the Work Diary would not be a true reflection of his work time in 24 hr period. He could continue to work until 9pm that night (4am start), whereas he should be stopping no later than 2pm.

Page 10 -Similarly in first paragraph re starting from midnight.

My understanding was that a “reset rest break” resets the clock. By the text in para. 4, when changing from AFM, you effectively have to have been working under the Standard Hours or BFM prior to changing, except for maybe specific days early in the period. If you had been working within the new hours option limits whilst ticking the AFM box, would you still need a “reset rest break” ??

Page 11 – Authorised Officer – perhaps there could be more information on who is an Authorised Officer.

Page 13 – in the BFM Solo Drivers table “36 hours of long/night work time” refers down to note 2, which discusses night rest break.

Should be a note to describe what is long/night work time.

Suggest also adding the hint re the shading of daily sheets as shown on page 12. (If always working BFM, would not be looking at Standard Hours page)

Page 20 – Under the Abbreviations, suggest adding the following as examples,

PB – Parking Bay RA – Rest Area SC – Service Centre

Page 24 – Para 3, Important advice ! “ If you do not From the end of any rest break”

This would only apply to BFM two-up, so should be highlighted as such. All other options, if you did not have the required major rest break, you would already be in breach.

In the example, it is stated, “a BFM solo driver would count a period of 7 days from the end of any rest break”. Perhaps this should be from a relevant major rest break, ie, 7 hr or 24 hr. Otherwise, you get the situation where an Officer picks the end of a 15 minute break in the middle of a day, and counts forward, possibly leading to a breach, as it would not be practical to keep track of night/long work time from end of every rest break. Generally, keep track from the end of 7 hr rest period.

Perhaps, need to add 7hr rest period to BFM table on page 13, or a note stating that 7 day period starts from end of any 7 hr break. (Don’t know what the legislation says)

Request that an example of counting 24 hour period under BFM solo option be added, particularly with an illustration of how it is possible to have more than 14 hrs on a single page. Feedback from drivers is that some Officers are still of the opinion that you cannot have more than the limit of hours on a page, ie, STD – 12, BFM 14.

For example, when counting forward from a major rest break in a 24 period, it is possible to have up to 16.5 hrs on a single page under BFM and still be legal. This is dependent on the start time and what work is done on the day before and after.

Page 28 – Para. 4, states that “You can download a blank copy of a national driver work diary sheet from the NVHR site.....”

Suggest adding the actual web address so that it is easily accessible.

NATIONAL DRIVER WORK DIARY DAILY SHEET – EXAMPLE PAGE

Two major issues I have with the current Work Diary is that it is difficult to complete information at the top of the page, particularly, as you get to the end of the diary, and filling in the name and date fields is difficult for left handed drivers. Consider that, in a truck, we are either resting the diary on our lap or the steering wheel. The extra room for drivers name in the new diary is much appreciated.

The attached pdf document is a mock up of suggested changes to the layout.

The comments box has been made 5 mm smaller in height. This is only for use on occasion.

The work and rest areas have been reduced to 10 mm high. We only need to draw lines in here so height is not so important.

This has enabled an extra 10mm space at the top of the page, so that when a driver is filling in the details that are required every day ,the previous days folded over pages do not impinge on the writing area.

For the left handed driver (yes, I am one), the main area requiring writing has been moved to the centre of the page, so that the driver's hand can rest on the diary whilst making entries. (As is possible for right handed drivers now)

The boxes to be checked are now at either end of the page.

Having the selection of driving hours option at the top left, should ensure that less drivers forget to check the relevant box.

These minor layout changes should assist all drivers to complete their work diary more clearly and legibly.