# **Corporate Plan**

2021-22 to 2024-25



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# Statement of preparation

I am pleased to present the 2021 NTC Corporate Plan for the four reporting periods from 2021–22 to 2024–25. This plan is prepared in accordance with paragraph 35(1) (b) of the *Public Governance, Performance and Accountability Act 2013* and in accordance with the Public Governance, Performance and Accountability Rule 2014.

The NTC operates within a complex transport system, where the everchanging social and economic landscape demands innovative and agile reform. This corporate plan details how the NTC will respond to this environment and the reform priorities of Australian infrastructure and transport ministers.

I am confident the NTC is well equipped to deliver on the program of work detailed in this plan and look forward to seeing how the organisation responds to emerging opportunities in the sector.



**Carolyn Walsh** Chair

# Foreword

This corporate plan outlines how the National Transport Commission (NTC) will deliver high-value reform through partnerships and collaboration.

To deliver the program of work in a complex and changing environment, it is imperative that the NTC looks at, and works across, the land transport system as a whole. This means acting as a facilitator across the system, working with our partners to optimise outcomes in both the current and longer term.

The NTC has demonstrated this facilitative and collaborative approach through:

- coordinating efforts across the rail sector through the National Rail Action Plan to clarify opportunities, facilitate innovation and harmonise the system
- partnering with our Commonwealth Government counterparts to deliver a robust, comprehensive framework to support the commercial deployment of automated vehicles in Australia
- building on two years of close collaboration with industry and states and territories to move into implementing an updated Heavy Vehicle National Law that better supports safety, productivity and innovation.

The ongoing impact of COVID-19 has presented challenges and opportunities, prompting a societal shift in the way we work. While the NTC was well prepared to shift to different ways of working, COVID-19 has delivered many valuable lessons.

It sharpened our focus on agility and flexibility in how we engage with our partners, how we deliver reform and the location of NTC staff. All NTC meetings are designed for online and in-person participation, allowing us to take a 'digital by default' approach to optimise resources and collaboration.

It also enabled us to capitalise on remote working by expanding recruitment to include people based across Australia. This gives the NTC a workforce that is more reflective of our national role.

These lessons will continue to inform and enhance our capacity and capability over the next four years. The NTC is an organisation full of talented and passionate people, and I thank all NTC staff for their commitment. I look forward to working with everyone to deliver on this ambitious program of work.



This year I am also pleased to partner with the Commonwealth and Infrastructure Australia in progressing the Women in Transport initiative to connect and acknowledge women in transport, and encourage the increased participation of women in running the Australian transport system.

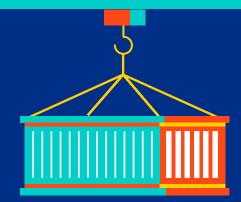
On behalf of everyone at the NTC, I extend my sincere thanks to our partners across the system for their help in advancing social and economic outcomes for all Australians through national land transport reform.

Gillian Miles Chief Executive Officer and Commissioner



# About the National Transport Commission

Our vision: The NTC advances social and economic outcomes for all Australians through an efficient, integrated and national land transport system.



#### Who we are

The NTC is a national land transport reform agency. The NTC leads reform to support all Australian governments – from helping to define the problems and opportunities transport ministers ask us to look at, through to policy development and facilitating legislative amendments, to implementation planning and review.

As a key contributor to the national reform agenda, the NTC is accountable to Australian transport ministers through the Infrastructure and Transport Ministers' Meeting (ITMM), which comprises Commonwealth, state and territory ministers who are responsible for transport and infrastructure, and local government representation. We work closely with the ministers' advisory body, the Infrastructure and Transport Senior Officials' Committee (ITSOC), which includes the heads of Commonwealth, state and territory agencies as well as other transport bodies.

The National Transport Commission Act 2003 and the Inter-Governmental Agreement for Regulatory and Operational Reform in Road, Rail and Intermodal Transport establish the NTC and define our role.

Transport ministers determine our program of work, which is set out in this plan. They provide further direction and guidance through a *Statement of Expectations* and *Performance-based framework* for the NTC and their *Strategic Work Programme* which outlines the national reform priorities.

The NTC has around 40 staff who are policy, engagement and economics specialists. The NTC is led by a Commission of six commissioners including the Chief Executive Officer, with a head office in Melbourne.

The NTC is accountable to all Australian governments with a focus on achieving truly national outcomes.

### **Our purpose**

# We lead national land transport reform.

The NTC leads national land transport reform in support of Australian governments to:

- improve safety, productivity, environmental outcomes and regulatory efficiency, and provide for future technologies
- promote an integrated and nationally consistent land transport system
- help achieve the strategic objectives of Australia's infrastructure and transport ministers.

#### Our role

Land transport is managed and regulated at all levels of government in Australia across multiple agencies and regulators. The NTC has a unique role within this landscape to harmonise Australia's road, rail and intermodal transport systems. We do this by working with the Commonwealth, states and territories in consultation with a range of stakeholders and the broader community to negotiate solutions for all Australians. The NTC leads national land transport reform by using these mechanisms to develop and implement policy:

## Coordination, influence and facilitation

The NTC works across the land transport system to bring the right people together and enable them to achieve better outcomes for the system as a whole.

This means working with government partners, industry and the community to develop solutions to best meet Australia's transport needs. While regulation is often the outcome of this work, in many cases the solution is simply finding common ground between our partners and assisting to harmonise their activities.

The NTC supports the Commonwealth, states, territories and national regulators to implement ministerially approved policy recommendations in alignment with all other work and, where relevant, help progress policy recommendations through other decision-making bodies.

The NTC also plays an active role in national strategies, working groups and steering committees.





#### **Regulatory guidance**

The NTC develops and maintains guidance material to complement the regulatory framework and support a range of stakeholders operating in the transport system.

The NTC maintains the following guidance material:

- Load Restraint Guide (Performance Standards for the Safe Carriage of Loads on Roads)
- Guidelines for Trials of Automated Vehicles in Australia – with Austroads
- National Enforcement Guidelines for Automated Vehicles
- Assessing Fitness to Drive for Commercial and Private Vehicle Drivers – with Austroads
- National Standard for Health Assessment of Rail Safety Workers

In addition to published guidance, the NTC provides ongoing advice, clarification and information to all stakeholders on implementing, administering and complying with approved reforms.



#### **Regulatory instruments**

The NTC designs and develops nationally consistent regulatory and operational arrangements and is responsible for developing, maintaining and negotiating model and national law.

The NTC has a large ongoing program of work to maintain a suite of national laws, model laws and other instruments. This program of work includes:

- Heavy Vehicle National Law applied law that is hosted by Queensland
- Rail Safety National Law applied law that is hosted by South Australia
- Australian Road Rules (model law)
- Transport of Dangerous Goods by Road or Rail (model law)
- Heavy Vehicle Charges Regulations (model law)
- Australian (Light) Vehicle Standards Rules (model law)
- Australian Defence Force Road Transport Exemption Framework.

The focus of the NTC's work is to ensure these instruments remain contemporary and consistent with their policy intent, and to capitalise on any improvement opportunities that could offer broader value. We do this through a mix of regular amendment packages provided to the ITMM, and larger more systemic reviews to identify if significant change is needed.

For applied national law, the NTC works with host jurisdictions to help pass the legislation once a reform or amendment package is agreed by ministers.

The NTC is also responsible for providing advice to governments on heavy vehicle charges (guided by the pricing principles agreed by Australia's transport ministers).

## Research, reporting and evaluation

The NTC provides a suite of regular analysis and reporting for transport ministers and other stakeholders, including assessments of reform implementation.

The NTC also undertakes research, as directed by the ITMM, to support model and national law reform and broader strategic transport policy.



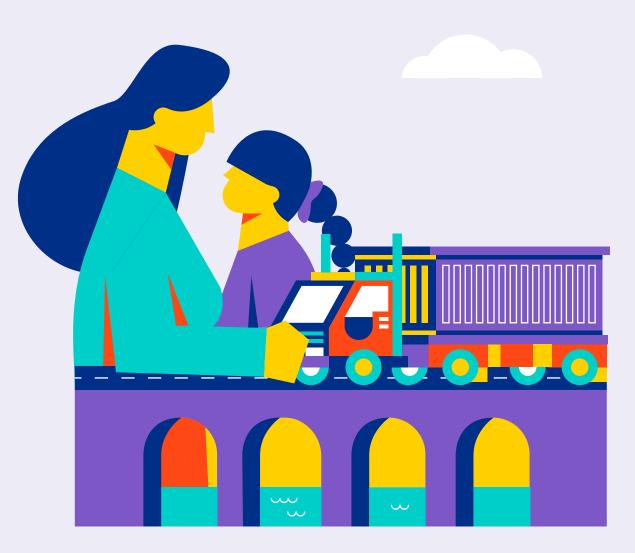
#### **Partnerships**

The NTC partners with other transport or government bodies where there are opportunities to deliver parts of our work program better by drawing on other agencies' expertise or role in the transport system.

We work closely with a range of other transport bodies and have signed memorandums of understanding with our key partners: the Office of the National Rail Safety Regulator, the National Heavy Vehicle Regulator and Austroads.

See 'Our partners and role in the transport system' for more on who we work with and how.

The NTC delivers its work through an annual work program approved at the Infrastructure and Transport Ministers' Meeting.



# Our reform landscape

Our operating environment is complex and dynamic, with responsibility for transport reform shared across all levels of government, other agencies and regulators.



#### Navigating a complex and dynamic transport system

The NTC operates in a complex and changing transport landscape where technological advances and changing social and economic expectations mean transport policy has to keep pace to make sure Australians can enjoy the benefits of their transport networks. This has never been more evident than in 2020 and 2021 as the impacts of a global pandemic are felt across the country, with major disruption in the freight and travel industries.

#### **KEY RISK:**

To be effective the NTC needs to maintain a high degree of both broad and in-depth awareness across a changing transport environment. Executive and senior staff in each of the NTC's policy portfolios are responsible for working with partners across the transport system and scanning trends in technology and regulation. This is consolidated through regular program-wide discussions and forums to inform the NTC's program of work as a whole.

Technological advances and changing social and economic expectations mean transport policy has to keep pace.

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The impact of COVID-19 on our cities and the way we travel is likely to bring longlasting change to our urban transport networks.

#### Our changing environment

Internationally, plans for releasing increasingly automated vehicles appear to have curbed and the industry has seen some consolidation. However, while increased levels of automation have slowed, there has been an increasing interest in the data that vehicles generate and how it can be harnessed to improve the safety and productivity of Australia's road network. Connected vehicles, both vehicle-to-vehicle and vehicleto-infrastructure, will become increasingly common in the market ahead of vehicles with higher levels of autonomy, promising significant potential benefit if nation-wide deployment is achieved.

The impact of COVID-19 on our cities and the way we travel is likely to bring long-lasting change to our urban transport networks. Falling public transport volumes have been slow to recover, meaning cities are increasingly relying on roads and active transport facilities. As workers progressively return to our major cities, the impacts of having significant workforce numbers now accustomed to working from home will ultimately change settlement patterns. This makes it challenging to accurately predict travel until new patterns clearly emerge. This might change both the need for infrastructure and the way in which it is used, such as the potential for e-scooters (and similar vehicles) to use bicycle lanes.

Rapid changes to rules to allow for more frequent deliveries to supermarkets show that ongoing reform is both possible and a necessary part of economic recovery. The NTC's work to update the Heavy Vehicle National Law will be an important contribution.

Even before COVID-19, Australian governments were making significant investments in both freight and passenger rail networks; this has only accelerated with increased infrastructure spending to support economic recovery. While this investment will make a major contribution to Australia's productivity, it also highlights the importance of aligning investment and working towards increasing levels of interoperability and harmonisation.

Road fatalities dropped by 80 during the 2020 calendar year (from 1,186 to 1,106), but are still higher than the target of 998 set in the 10-year National Road Safety Strategy 2011–2020. Australia's annual road fatality rate (deaths per 100,000 people) also dropped in this period, from 4.7 in 2019 to 4.3 in 2020. These reductions occurred alongside significantly reduced traffic volumes as a consequence of COVID-19. Improvements in technology, including greater automation, will contribute to better outcomes: however, achieving future targets will require a focus on human behaviour and, increasingly, how people interact with technology.

While our 2019 Carbon Dioxide Emissions Intensity for New Australian Light Vehicles report showed improvements in the emissions intensity of new vehicles and electric vehicle sales, transport continues to be responsible for about 18 per cent of Australia's greenhouse emissions. As the emissions intensity of the stationary energy sector improves, transport will make up an increasing share of our total emissions.

Delivering reform within this environment requires an in-depth understanding of everyone else operating within it, and how their objectives and roles tie in with the NTC's reform work. The range of timeframes, agencies and sectors coming together to deliver transport reform adds another layer of complexity to this landscape.

#### **KEY RISK**:

The NTC needs to manage competing priorities and timelines across the transport sector to successfully deliver reform.

To ensure an aligned approach, the NTC's program of work is shaped around transport ministers' reform priorities, and our reforms are planned and developed in close consultation with our partners. We are also supporting a more coordinated approach to reform delivery across the transport system by taking a more active role as a facilitator and coordinator.

## Delivering reform through partnerships and collaboration

#### Our changing environment

Collaboration is at the core of what the NTC does: we can only deliver meaningful reform by engaging across the whole transport system. A more interconnected and complex transport system means that working in partnership with others – both within and outside the traditional transport sphere – is increasingly the best way to achieve national objectives. This means the way we work with others is changing.

The NTC's role in this environment is as a facilitator across the system to deliver more through partnerships and collaboration. Engagement is integral to effectively identifying, planning and co-creating solutions that meet stakeholders' needs. At the same time, we need to balance this against the capacity of our partners to engage, particularly with the impact of COVID-19 on exacerbating resourcing pressures. COVID-19 has seen the NTC quickly move to digital platforms to engage with stakeholders. While this has posed challenges, the transition to digital platforms is offering many opportunities to engage more broadly and more effectively.

#### **KEY RISK**:

The NTC needs to engage effectively across the transport sector to ensure the timely development, adoption and implementation of reform.

The NTC has prioritised engagement as a core capability. This is reflected in our new operating model and organisational structure, capability framework, organisational development, processes and systems. We are focused on building our capability in more collaborative and digital engagement and applying this to tailor our approach for each audience and purpose. The way the NTC works with Australian governments is also changing as the Transport and Infrastructure Council (a Council of Australian Governments {COAG)), to which the NTC reported, was replaced with a National Cabinet model in 2020. The NTC will work with the Commonwealth Government to effectively adapt to this new model and continue to be responsive to ministerial priorities.

The NTC is supporting a more coordinated approach to reform delivery across the transport system by taking a more active role as a facilitator and coordinator.

## Delivering reform through partnerships and collaboration (continued)

Our partners and role in the transport system

#### Infrastructure and transport ministers and senior officials

The Infrastructure and Transport Ministers' Meeting (ITMM) sets the strategic direction and national transport agenda. The meeting is advised and assisted by the Infrastructure and Transport Senior Officials' Committee (ITSOC).

The NTC, alongside ITSOC, acts as an expert adviser to the ITMM to support the delivery of the ministers' strategic work programme and reform priorities. The ITMM approves our work program and reform proposals by consensus.

#### Industry and private sector

Industry, the private sector and academia are important partners as experts in their field, drivers of reform (e.g. as developers and users of new technology) and as regulated parties affected by our reforms.

The NTC draws on the expertise and experience of the private sector and industry to inform our current reforms, to ensure our work is evidence-based and to identify opportunities for future reforms.

We conduct broad-reaching consultation so we can genuinely reflect the views of industry in our advice to the ITMM.

### State, territory and Commonwealth governments and bodies

Australian governments are invested in the NTC's work as the owners of reform implementation.

Australian governments agree the NTC's work and reforms through ITSOC and ITMM. The NTC works closely with transport agencies, police and work health and safety agencies to ensure our proposals are practical, supported and represent the best possible national solution. The NTC develops policy recommendations and legislation in close collaboration with the Office of Best Practice Regulation and the Australasian Parliamentary Counsel's Committee.

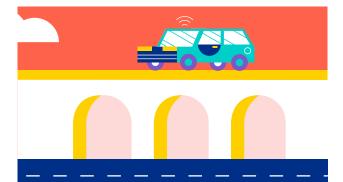


#### National transport bodies and regulators

National transport bodies and regulators have a significant role in Australia's transport system.

The NTC maintains robust, effective and collaborative working relationships with our partner transport entities to achieve transport ministers' objectives:

- Australian Road Research Board – independent transport knowledge and research
- Austroads systems and research to harmonise practice and improve guidance for road transport managers
- National Heavy Vehicle Regulator – regulatory oversight of heavy vehicle safety and productivity in Australia
- Office of the National Rail Safety Regulator – regulatory oversight of rail safety in Australia
- Rail Industry Safety and Standards Board – development of Australia's standards, codes of practice, guidelines and rules for the rail sector.
- Transport Certification
   Australia assurance in the
   use of telematics and related
   intelligent technologies



#### **International partners**

The NTC works with the United Nations and international counterparts and organisations to ensure Australia's transport regulation aligns with international practices, systems and approaches to enabling new technologies.



#### The Australian community

The general public is our biggest stakeholder – our work affects every Australian as end users of our reforms.

We are focused on making it easier for the community to understand our role, effectively engage with us and contribute their views.

## Operating as an effective public sector agency in a changing environment

The NTC is operating in an increasingly fast-paced and changeable environment. To successfully deliver our reform work in this environment, we need to adapt and respond while maintaining excellence in public governance, performance and accountability. This calls for the NTC to be a more adaptable, digital and future-ready organisation. The NTC is responding by broadening how and where we recruit, embedding our policy capability framework, focusing on core policy and engagement skills, and enhancing our strategic workforce planning and development. This is supported with a more agile operating model that enables the NTC to pivot and respond to changing priorities.

#### **KEY RISK:**

The rapidly evolving transport policy environment makes it challenging to develop and retain the skills and capability required to deliver the NTC's program of work.

#### **Our changing environment**

The COVID-19 pandemic has expediated changes in how the NTC works. In 2020 the entire organisation moved quickly to remote working, and a hybrid of office-based and workfrom-home arrangements is expected to become our new normal, bringing with it both challenges and opportunities.

#### **KEY RISK:**

The NTC needs to capitalise on and embed the more agile work practices adopted for COVID-19 to enable more resilient and effective delivery of the program of work.

The transition to, and normalisation of, remote working practices provided opportunities for the NTC to become more agile in recruiting for, resourcing to, working on and engaging on reform work. We are now embedding these more flexible practices as normal business to improve how we operate in the longer term. The NTC has capitalised on remote working by broadening our recruitment to include people based in other locations across Australia. This allows us to get the best people for the role regardless of where they are based, gives us a workforce that better reflects our national role, and enables more local engagement with our partners in other locations. We are complementing this with co-location arrangements to provide remote staff (including from partner agencies) with a local office to work from.

The NTC is also bringing in specialist skills and resources only as needed to supplement our core workforce. This allows us to focus on excellence in our core skills of policy development and engagement while being able to quickly scale up or change tack to deliver additional work as needed.

Remote working and the impacts of the pandemic have called for an increased focus on staff wellbeing and engagement. The NTC is placing greater emphasis on ensuring all staff are supported and feel connected to our purpose and culture regardless of where they are working. The NTC's work health and safety program is playing an increasingly prominent role in managing mental and physical health considerations (including COVIDSafe planning) both in and out of the office.

Remote working and stakeholder engagement places additional demands on our technology capabilities. The NTC has effectively moved to a fully digital workplace and is looking to enhance capabilities by developing ICT systems that enable efficient, agile and collaborative work practices and effective digital engagement with all stakeholders. To support this more digital approach, we are maintaining our strong focus on cybersecurity to protect our information and systems.

#### Ensuring effective governance and operation of the NTC

Effective governance underpins the NTC's ability to deliver reform work and meet the legislative obligations and performance expectations of a public sector organisation. The transport ministers' *Statement of Expectations* for the NTC directs the Commission to:

- create a culture of performance that effectively carries out the transport ministers' priorities with available resources, expertise and systems
- maintain high standards of professionalism, service, probity, reporting, accountability and transparency, consistent with governments' aims of excellence in the public sector.

#### **KEY RISK:**

The Commission needs to deliver on all aspects of the transport ministers' *Statement of Expectations* to ensure the success of the NTC.

The Commission has a clear focus on the NTC's delivery, governance and relationships and addresses the *Statement of Expectations* through the NTC's corporate plan. As a commissioner, the NTC's CEO provides a strong link between the organisation and Commission, and the Commission has additional oversight and input into the NTC's work and governance through four regular meetings a year. Further oversight is provided through the Risk, Audit and Governance Committee, a committee of the NTC Commission that is responsible for independently assessing the NTC's governance and risk management policies and procedures. The Commission also meets as needed to discuss matters in more detail, and commissioners use their own expertise and networks to support the NTC's reform delivery.

The NTC has moved to a new and more agile operating model to more effectively resource, manage and deliver our reform work, and to optimise expertise across the organisation. We will continue to embed and refine this model, and to develop and support effective leadership to promote an engaged workforce and high-performing culture.

As a government agency the NTC's governance practices are aligned with relevant legislation including the *Public Governance, Performance and Accountability Act* 2013, whole-of-government policies such as the National Archives of Australia's information management policies, and the processes to get our work submitted to and approved by transport ministers. We are streamlining our processes and practices to deliver on these requirements as efficiently as possible to optimise our capacity as a small organisation.

The small size and more agile deployment of the NTC's workforce makes longer term succession planning, knowledge sharing and information management increasingly critical.

#### **KEY RISK**:

The NTC has a lot of specialised reform knowledge that needs to be maintained and shared to ensure continuity and efficiency in how the NTC delivers reform.

The NTC is taking an active approach to developing, sharing and documenting critical knowledge, skills and processes to ensure continuity and reduce the risk of information being lost. This is being further supported with enhanced workforce planning and the associated capability framework.

The NTC has moved to a new and more agile operating model to more effectively resource, manage and deliver our reform work.

NTC Corporate Plan 2021-25



# Leading and delivering reform

The NTC works in partnership to deliver reform as part of the wider transport system.

#### Our program of work for 2021–22 to 2024–25

The key activities the NTC will undertake to achieve its purpose are delivered through the program of work. This program of work is shaped around reform portfolios that address the objectives of the *Intergovernmental Agreement for Regulatory and Operational Reform in Road, Rail and Intermodal Transport* and the priorities set by transport ministers – future technologies, safety, productivity, sustainability and advisory.

The NTC's work has been planned across the next four years as outlined in this section. We will add any additional work requested by the ITMM as it arises.

#### **Enabling future technologies**

The future technologies portfolio focuses on removing barriers to innovation and enabling the safe use of new and emerging transport technologies so Australians can gain the safety, mobility and environmental benefits of these

technologies. Our emphasis is on ensuring Australia's policy

and regulations keep pace with rapidly evolving technologies within

the transport sector, including the development of connected and automated vehicles.

Automated vehicle program This reform program focuses on achieving national consistency with the goal of end-to-end regulation to support the safe commercial deployment and operation of automated vehicles at all levels of automation in Australia. The key activities in this program are:	2021-22	2022-23	2023-24	2024-25
Updating the Guidelines for trials of automated vehicles in Australia Regularly reviewing and updating the Guidelines for Trials of Automated Vehicles in Australia (which set conditions for trials of automated vehicles) to ensure they remain fit for purpose and support safe trialling of automated vehicles in Australia.				
<b>Establishing an in-service safety regulatory regime for automated vehicles</b> Developing legislative reform options to the ongoing safety of automated vehicles on Australian roads, including driving laws for automated vehicles and legal obligations for automated driving system entities and human users.				
Updating the National enforcement guidelines for automated vehicles Regularly reviewing and updating the <i>National enforcement guidelines for automated vehicles</i> (which clarify concepts of control and proper control for different levels of automation) to ensure they remain fit for purpose.				
Undertaking an automated vehicle readiness assessment for Australia Working with the Commonwealth, state and territory governments and Austroads to assess Australia's readiness for the commercial deployment of automated vehicles and report back to the ITMM in 2022.				

To deliver the automated vehicles program of work, the NTC is working with an Automated Vehicles Senior Advisory Group, which represents all states, territories and the Commonwealth and is supported by the Automated Vehicles Legislative Policy Group.

These advisory groups are supplemented with targeted engagement forums for individual reforms and an Automated Vehicle Industry Insights Group that provides industry input to the program.

#### Vehicle-generated data program

Vehicle and road operator data can enable opportunities for transport agencies and industry to create value by enhancing network operations, investment, maintenance, planning and road safety. This program looks at how to optimise this value while managing commercial, privacy and security issues and without creating barriers to deploying technology. The key activity in this program is:

#### Leading the National Vehicle Data Working Group

Working with industry stakeholders, the Commonwealth, state and territory governments and Austroads to formally establish the National Vehicle Data Working Group and report back to the ITMM annually on progress.

The working group will lead development of the vision and principles for the future exchange of vehicle and road operator data.

2021-22

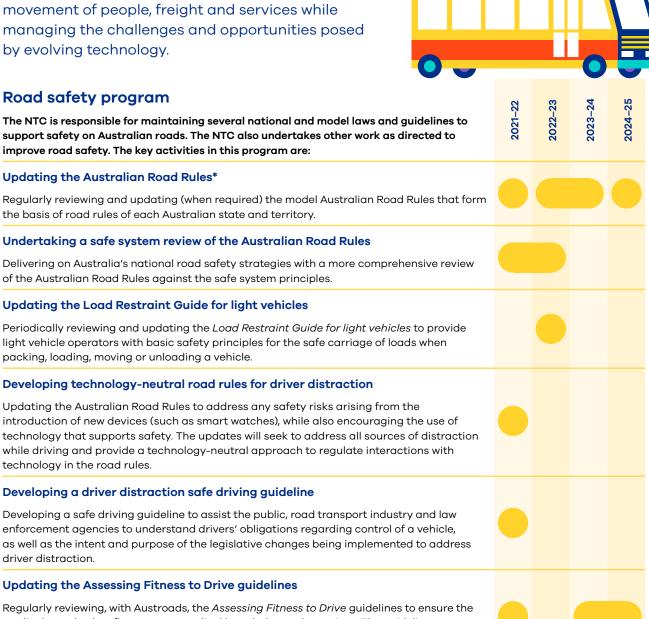
2022-23

2024-25

2023-24

#### Improving safety outcomes

The safety portfolio focuses on promoting the safe movement of people, freight and services while managing the challenges and opportunities posed by evolving technology.



medical standards reflect current medical knowledge and practices. The guidelines are a joint NTC and Austroads publication containing the nationally agreed medical standards for granting a driver's licence.

The NTC engages widely across the transport, enforcement, workplace, health and safety sectors to deliver the road safety program. To deliver the Assessing Fitness to Drive standards, the NTC works with specialist medical colleges and working groups to consult with medical professionals, driver licensing agencies, coroners and public health groups. The NTC delivers the Load Restraint Guide in consultation with its Load Restraint Guide Maintenance Advisory Group, which includes states and territory road authorities.

\* This law is regularly reviewed but amendment packages will only be developed if required.



#### Rail safety program

The NTC maintains both the Rail Safety National Law and the *National Standard for Health Assessment of Rail Safety Workers* and undertakes any other relevant work to improve rail safety in Australia. The key activities in this program are:

#### Updating the Rail Safety National Law\*

Regularly reviewing and updating (when required) the Rail Safety National Law to promote a seamless and coordinated national approach to rail safety regulation in Australia.

#### Updating the National Standard for Health Assessment of Rail Safety Workers

Periodically reviewing and updating the *National Standard for Health Assessment of Rail Safety Workers*. This is the standard against which all health assessments of rail safety workers in Australia are conducted and provides practical guidance for rail transport operators for managing the risks posed by the ill health of rail safety workers.

The NTC reviews and updates the Rail Safety National Law with states, territories and the Office of the National Rail Safety Regulator. When reviewing the *National Standard for Health Assessment of Rail Safety Workers*, the NTC consults heavily with industry, rail unions, rail safety regulators and medical professionals.

\* This law is regularly reviewed but amendment packages will only be developed if required.

Land transport of dangerous goods program The NTC is responsible for maintaining the Australian Code for the Transport of Dangerous Goods by Road and Rail and the related Transport of Dangerous Goods by Road or Rail model laws, and undertakes any other opportunities to improve the land transport of dangerous goods. The key activities in this program are:	2021-22	2022-23	2023-24	2024-25
Updating the land transport of dangerous goods code and model laws Maintaining the Code and model laws in alignment with United Nations recommendations on the Transport of Dangerous Goods Model Regulations while identifying and progressing any other opportunities to improve the consistency and efficiency of regulating the land transport of dangerous goods in Australia.				
Undertaking a comprehensive review of the land transport of dangerous goods code Conducting a full review of the Australian Code for the Transport of Dangerous Goods by Road and Rail (including the Australian-specific chapters that are not part of the regular updates) to update outdated chapters, identify and correct translation errors, and incorporate relevant concepts from the United Nations agreement on the land transport of dangerous goods to make the Code's requirements easier to understand.				
<b>Establishing training requirements for the land transport of dangerous goods</b> Developing a training matrix based on a training needs analysis, including discrete, task- specific training and explore the potential for a dangerous goods specialist advisory competency. This would provide greater clarity for those involved in transporting dangerous goods, enable more fit-for-purpose training packages on the open market, and align with similar initiatives in the maritime and air transport sectors.				

The Code and associated laws place duties on those who classify, pack, label and consign dangerous goods as well as those who transport them. To deliver the dangerous goods program successfully, the NTC engages extensively with competent authorities including the Competent Authority Panel, transport agencies, peak bodies for operators and carriers who transport dangerous goods, and industries and associated industry bodies across the entire dangerous goods supply chain.

2021-22

022-23

2023-24

2024-25

#### Increasing productivity

The NTC is focused on promoting competitive national and international supply chains while reducing the regulatory burden, to support Australia's land transport system to be more productive and efficient.



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#### Heavy vehicles program

The NTC is responsible for maintaining the Heavy Vehicle National Law, which regulates heavy vehicles over 4.5 tonnes gross vehicle mass in participating states and territories. The NTC also undertakes other work as directed to support heavy vehicle safety, productivity and innovation. The key activities in this program are:	2021-22	2022-23	2023-24	2024-25
Undertaking a comprehensive review of the Heavy Vehicle National Law				
Comprehensively reviewing the Heavy Vehicle National Law to deliver – from a first principles perspective – a modern, outcome-focused law regulating the use of heavy vehicles that will:				
<ul> <li>improve safety for all road users</li> </ul>				
<ul> <li>support increased economic productivity and innovation</li> </ul>				
<ul> <li>simplify the National Law, its administration and enforcement</li> </ul>				
<ul> <li>support the use of new technologies and methods of operation</li> </ul>				
<ul> <li>provide flexible, outcome-focused compliance options.</li> </ul>				
Implementing the outcomes of the review of the Heavy Vehicle National Law				
Implementing ministerially agreed policy changes to the National Law resulting from the review.				
Updating the Heavy Vehicle National Law*				
Regularly reviewing and amending the National Law (following implementation of any changes) to ensure it remains contemporary and meets its policy objectives.				

To deliver the heavy vehicle program, the NTC is engaging extensively across governments and the heavy vehicle sector, and working with dedicated groups to advise us and ensure stakeholder representation. This has included strategic oversight from senior representatives in each jurisdiction; an expert panel (appointed by ministers) with expertise in productivity and experience across the transport sector; industry; and heavy vehicle regulators including the National Heavy Vehicle Regulator, police and state road authorities.

\* This law is regularly reviewed but amendment packages will only be developed if required.



#### Australian Defence Force exemption framework program

The NTC is responsible for maintaining the *Australian Defence Force Road Transport Exemption Framework*. This framework provides nationally uniform exemptions for using Australian Defence Force military vehicles and equipment on public roads to reduce risk and minimise damage to roads and related structures while allowing oversized Australian Defence Force vehicles to operate on approved routes without the need to apply for special permits. The key activities in this program are:

#### Updating the Australian Defence Force exemption framework

Periodically updating the Australian Defence Force Road Transport Exemption Framework to ensure it remains current.

#### Developing an online geospatial tool to digitise the Australian Defence Force exemption framework

Translating the current turn-by-turn descriptions of approved routes in the *Australian Defence Force Road Transport Exemption Framework* into a geospatial, web-based tool to make the Framework more accessible for jurisdictions and the Australian Defence Force, and enable it to be integrated into online maps, and streamline the ongoing process for updating the Framework.

The NTC delivers this program in collaboration with the Australian Defence Force Exemption Framework Working Group which represents all state and territory road agencies and the Australian Defence Force.

#### Vehicle standards program

The NTC is responsible for maintaining the Australian Light Vehicle Standards Rules (model law) and the Heavy Vehicle (Vehicle Standards) National Regulation (under the Heavy Vehicle National Law and model law in Western Australia and the Northern Territory) to ensure they remain contemporary and promote improved transport productivity and safety outcomes.

These instruments prescribe vehicle standards that regulate the in-service standards for vehicles (including engine brake noise limits) in alignment with the Australian Design Rules that are developed and administered by the Commonwealth Government.

As needed, the NTC also updates the *National Stationary Exhaust Noise Test Procedures for In-Service Motor Vehicles.* The key activity in this program is:

#### Updating the vehicle standards for light and heavy vehicles

Regularly reviewing the Australian Light Vehicle Standards Rules and the Heavy Vehicle (Vehicle Standards) National Regulation.

The NTC engages with states, territories, the Commonwealth Government, the National Heavy Vehicle Regulator and a range of specific road-user stakeholders to deliver the vehicle standards program.

Freight supply chain program	Ŗ	-23	-24	-25
The NTC has responsibility for road, rail and intermodal transport, and undertakes work across these three modes where there are opportunities to optimise freight productivity or improve the efficiency of the supply chain. The key activity in this program is:			2023-	2024-25
Developing guidelines for stevedore infrastructure and access charges				
Developing voluntary national guidelines for applying stevedore infrastructure and access charges at Australia's container ports to:				
<ul> <li>promote transparency and cooperation across the national containerised freight supply chain when introducing new or increased stevedore infrastructure and access charges</li> </ul>				
<ul> <li>provide a nationally consistent approach, through increased clarity and accountability for both stevedore companies and landside transport operators, on what pricing changes are to occur, the timing of any price change and the engagement process relating to a price change, to enable the supply chain to develop how costs will be recovered.</li> </ul>				

To deliver the freight supply chain program the NTC is working with all governments, stevedore companies and landside transport operators.

2022-23

2022-23

021-22

2023-24

2024-25

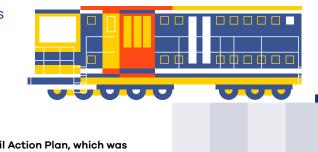
2021-22

2023-24

2024-25

#### Improving sustainability outcomes

The sustainability portfolio helps facilitate a sustainable transport system that enables us to achieve our desired social, economic and environmental outcomes in both the short and long term.



2024-25

2023-24

2022-23

021

2021-22

023-24

2022-23

224-25

#### National Rail Action Plan program

The NTC developed and is now implementing the National Rail Action Plan, which was endorsed by transport ministers in November 2019. The Plan has three major streams of work to create an optimised and sustainable rail system:

- skills and labour to ensure Australia has the skilled people it needs to build and operate its rail networks
- common standards to align infrastructure and rolling stock standards
- interoperability to support network solutions that achieve productivity and safety outcomes.

#### The key activity in this program is:

#### Implementing the National Rail Action Plan

Coordinating and facilitating the ongoing implementation of the National Rail Action Plan with a focus on:

- developing a framework to improve coordination of decision-making across the national rail system
- establishing a technical working group to understand interoperability impacts and opportunities at key freight/port and passenger interfaces
- developing a three-year plan for common standards to be aligned with the procurement plans of jurisdictions to cut costs and support scale
- addressing emerging skills gaps and portability issues through improved national coordination and development of faster career pathways and micro-credentials.

To implement the Action Plan, the NTC is coordinating three jointly chaired industry and government working groups (including rail industry bodies and standards boards) and technical working groups focused on 'skills and labour', 'interoperability' and 'harmonisation'.

#### **Emissions reporting**

The NTC has been collating and reporting on the carbon dioxide emissions intensity of cars and light commercial vehicles since 2009. This reporting gives consumers and governments a transparent benchmark on how Australia's car emissions performance is tracking. The key activity in this program is:

#### Reporting on carbon dioxide emissions intensity for Australian light vehicles

Developing and publishing an annual report on the carbon dioxide emissions intensity of cars and light commercial vehicles.

The NTC engages with the Federal Chamber of Automotive Industries, states and territories (transport agencies and fleet managers) and the Commonwealth Government to provide emissions reporting.

#### **Providing advice**

The advisory portfolio provides specialist advice to transport ministers to enable them to make decisions on the implementation and maintenance of the regulatory system.

Heavy vehicle charges program	8	e	4	ß
The NTC is responsible for providing advice to governments on heavy vehicle charges (guided by pricing principles agreed by Australia's transport and infrastructure ministers). These charges are intended to recover the road construction and maintenance costs that are attributed to heavy vehicles. The key activities in this program are:	2021-22	2022-2	2023-2	2024–25
Undertaking a heavy vehicle charges determination				
Undertaking a heavy vehicle charges determination to review the current pay-as-you-go methodology for setting heavy vehicle charges and providing recommendations on any improvement opportunities back to ministers in 2022.				
Advising on an annual adjustment to heavy vehicle charges				
Calculating the annual heavy vehicle charges and recommending an annual adjustment to these charges to allow revenue from heavy vehicle charges to keep pace with changes in heavy vehicle fleet use and governments' road spending programs.				
In the years between determinations, the NTC applies an annual adjustment formula as contained in the Heavy Vehicle Charges Model Law.				
Maintaining and improving the forward-looking cost base prototype model				
Continuing to maintain and update the prototype forward-looking cost base model in support of the Land Transport Market Reform work (led by the Commonwealth Department of Infrastructure, Transport, Regional Development and Communications) by collecting road expenditure data each year and incorporating it into the model.				

To deliver the determination, the NTC is working closely with states, territories and the Commonwealth, national and state-based trucking and road transport bodies, and particular industry sectoral groups.

The NTC maintains relationships with states, territories and the Commonwealth Government (transport agencies and treasuries) to support the forward-looking cost base prototype model and calculate the annual adjustment to heavy vehicles.

#### **Reform monitoring and evaluation**

The NTC is responsible for providing assessments of the implementation of agreed reforms, including analyses on derogations and variations and:

- the reasons for any delay, barriers to implementation, and actions required to address the delay
- whether any variations were implemented that would reduce the benefits of the reform
- minor policy reviews as needed to assess the success of implementation (e.g., the NTC has committed to reviewing the policy on small breaches for electronic work diaries no earlier than three years after approval of an electronic work diary).

The NTC also delivers larger evaluations (when scheduled) on the impact of existing reforms, including whether further uniformity is required to optimise productivity and safety benefits. The key activity in this program is:

Delivering the National Transport Reform Implementation Monitoring Report

Developing the annual National Transport Reform Implementation Monitoring Report.

The NTC's reform monitoring is informed by engagement with states, territories, the Commonwealth Government, the Heavy Vehicle National Regulator and the Office of the National Rail Safety Regulator.

For more information and progress updates on the NTC's work, visit our website at **www.ntc.gov.au**.

2021-22

2022-23

2023-24

224-25

### **Our capability**

The NTC's capability is the foundation from which we will successfully deliver our program of work while responding to our reform landscape.

Our focus is on getting the right people, culture, expertise and systems to successfully deliver reform outcomes. We will do this by focusing on four key capabilities: reform expertise, agility, a culture of performance, and operational excellence.

#### **Reform expertise**

Expertise that delivers workable solutions and high-value reform

#### **Focus areas**

A highly skilled workforce that delivers reform through expertise and capabilities in:

- regulatory reform develop an in-depth understanding of regulation and legislative and parliamentary processes to deliver workable implementation options that readily translate into law
- engagement build meaningful relationships and engage the right people, in the right way, and at the right time to achieve the best outcomes
- influence and facilitation create a robust case for change and support stakeholders across the transport system to deliver it
- research and policy design apply research, qualitative and quantitative analysis, and deep critical thinking to develop advice that is clear, concise, compelling and provides all the information required to act.



#### **Development pathway**

The NTC will continue to develop and maintain these core skills with initiatives including:

- aligning recruitment, workforce planning, learning and development activities, and performance management with the NTC Capability Framework
- using communities of practice and centres of excellence to share, record and develop our knowledge base
- embedding dedicated engagement specialists within reform teams to reshape how we plan and deliver our work to ensure it is designed with, and for, our stakeholders
- optimising the use of digital platforms and ICT systems to enable effective digital engagement, increase our engagement reach, and make it easier for people to engage with us
- providing greater opportunities for staff to work across locations, teams and roles to gain experience and knowledge and make the best use of everyone's skills and knowledge
- broadening recruitment beyond Melbourne to get the right skills and experience.



#### Agility

An organisation that moves quickly and adapts to deliver the right outcomes at the right time

#### **Focus areas**

The mindset and capability to deliver reform in a more agile way:

- an agile workforce adaptable, resilient and responsive to change both in what we deliver and how we work, underpinned by fit-for-purpose systems and practices that allow us to dynamically scale and resource to priorities
- leadership at all levels everyone is informed and empowered to take action and use their skills and knowledge to lead change; leadership at the NTC enables people to deliver outcomes
- collaboration mindset putting collaboration at the heart of everything we do and delivering outcomes through partnerships and networks
- delivering for outcomes and value having an outcomes-oriented mindset that looks for how to optimise value and then finds the best way to deliver it.

#### **Development pathway**

Our initiatives to improve agility include:

- continuing to embed and refine the NTC's agile operating model to apply the right skills at the right time across the organisation while delivering our program of work in a more streamlined and cohesive way
- challenging and testing our reform ideas and proposals in formal peer forums and review practices to drive outcomes-thinking
- reviewing and refining our program and project management practices to be streamlined and fit for purpose, supported by ICT systems that more effectively plan and manage our work and resources
- making it easier for people to work across teams and projects by recording and sharing our institutional knowledge, implementing ICT systems that enable more agile and collaborative work practices, and improving consistency in how we manage and deliver our work across the organisation
- shaping learning and development opportunities around promoting a collaborative leadership culture, equipping staff to effectively drive and lead change, and developing leadership capability at all levels of the organisation.

#### **Culture of performance**

A high-performing organisation with an engaged and capable workforce

#### **Focus areas**

Delivering high-quality work through a workplace culture that promotes and inspires everyone to be:

- quality-oriented taking pride and ownership in delivering work to the highest quality possible and driving a culture of intellectual curiosity that shares and learns from both failure and success
- engaged and committed emotionally and intellectually engaged and passionate about what the NTC does, and actively driving improvement
- proactive communicators effectively sharing and exchanging information and ideas through a strong communication culture that promotes transparency and clarity and gives everyone the knowledge and confidence they need to excel
- values-led living the NTC core values of care, commitment, courage, curiosity and collaboration to create a positive and productive workplace culture that celebrates success and delivers outcomes.



#### **Development pathway**

To shape a performance-oriented culture, our initiatives will include:

- embedding robust quality assurance processes and practices to ensure all work is tested and challenged at every stage of development and delivered to a high standard
- building our digital communication expertise and capacity and supporting all staff to take ownership of providing consistent, regular, transparent and genuine communication
- actively responding to annual staff engagement surveys and other feedback channels, developing the NTC's staff recognition program in alignment with our core values, and using our working group on culture and values to improve engagement and our working environment
- proactive workforce planning and development that looks at how to optimise training for the NTC, ensures learning is transferred into the workplace, and plans for the future.



#### **Operational excellence**

A strong foundation that enables the effective delivery of our work

#### **Focus areas**

Enabling the NTC to deliver its program of work by providing a foundation of:

- public governance, performance and accountability – demonstrating a culture of judgement, initiative and capability in how we manage our resources as a government agency
- organisational efficiency and resilience

   streamlined processes and practices
   that are adaptable in the face of change,
   disruption and uncertainty to ensure we
   can always engage and deliver our work
   effectively
- responsive ICT and facilities management – reliable and fitfor-purpose digital and physical infrastructure that supports us to deliver our work efficiently
- a workplace that promotes health and wellbeing – a positive and inclusive workplace culture that brings out the best in everyone, supports the wellbeing of our people and ensures productive and respectful employee relations.

#### **Development pathway**

The NTC will maintain the robust governance and resource management practices already in place and will improve how we deliver operational excellence through:

- delivering a comprehensive staff wellbeing program that includes integrating COVID-19 measures into business as usual and a greater focus on ensuring people are supported and connected with colleagues
- making our processes and practices more efficient and resilient by:
  - adopting a 'digital by default' approach to optimise how we use resources and collaborate
  - reviewing and streamlining core processes to be as intuitive as possible and automating or enabling with technology where feasible
  - using the NTC's efficiency and effectiveness

#### Our risk management and oversight

The NTC has an established risk management framework that provides a structured, ongoing process for the Commission, management and staff to identify, assess, respond to, and report on, risks that could prevent the NTC from achieving its organisational objectives.

Risks are managed at the project, program and enterprise levels. Project and program risks are actively managed through our project management software and governance processes. Enterprise risks are compiled in an enterprise risk register, which the Risk, Audit and Governance Committee reviews at each meeting before reporting to the Commission. The committee assures the Commission that there are risk mitigation plans in place for all significant enterprise risks and that all other risks are being appropriately managed. Biannually, it also reassesses all risks in the register and their controls working group to identify and progress improvement opportunities

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- incorporating the lessons learned from COVID-19 disruptions into our Business Continuity program
- improving the NTC's corporate planning processes and enhancing our ICT capability to monitor and report against these plans and other key performance measures
- continuing to enhance the NTC's digital architecture and capability, ensuring a high standard of cybersecurity and implementing whole-ofgovernment information management policies.

and mitigation strategies, and reports back to the Commission.

The NTC's core values call for a positive risk culture – one that promotes an open and proactive approach to managing risk and considers threats and opportunities through a culture of transparency. In promoting a positive risk culture, the NTC is helping to ensure risks are appropriately identified, assessed, communicated and managed across all levels of the organisation. Risk management training is provided to all staff on their induction, and discussions on risk and opportunity are an integral part of our governance and management meetings. The NTC has always incorporated 'lessons learned' into project closure processes and is looking to build on this further to ensure the organisation shares and learns from both successes and failures.



# Evaluating our performance

The NTC monitors its performance to drive continuous improvement both in how we deliver our work and the quality of what we do. The NTC reports regularly on our performance and on the delivery and implementation of our program of work through:

- NTC annual report reporting on the NTC's performance in line with the requirements of the *Public Governance*, *Performance and Accountability Act 2013*.
- the National Transport Reform Implementation Monitoring Report – annual reporting on the implementation of nationally agreed reforms.
- NTC work program progress report six-monthly reporting to the Infrastructure and Transport Senior Officials' Committee (ITSOC) on the progress of the NTC's program of work.

The NTC's performance measures respond to both our purpose and transport ministers' performance-based framework, which sets out ministers' performance expectations for the NTC. The primary way the NTC fulfils its purpose is by delivering the program of work. This program is agreed by transport ministers (through the Infrastructure and Transport Ministers' Meeting) in alignment with other work across the transport system to achieve their strategic objectives. Assessing how well we deliver this program of work is therefore critical to measuring the NTC's performance. As a reform organisation, most of the NTC's work contributes to shared and long-term objectives across the wider transport system and is implemented by others. As a result, there is limited evaluation or data on the reform impacts directly attributable to the NTC.

The NTC's unique role in the transport system and our relationship with the ITMM mean that outputbased measures often provide the clearest way to assess performance:

- Measures on how well we meet the performance expectations of the ITMM (as set out in the performancebased framework and other directions to the NTC) are used to help assess effectiveness.
- Measures on how well we deliver the agreed program of work within existing resources are the best indicators of efficiency.

To improve the information available for assessing performance, the NTC is enhancing the *National Transport Reform Implementation Monitoring Report* to include more evaluation on the impacts of our reforms.

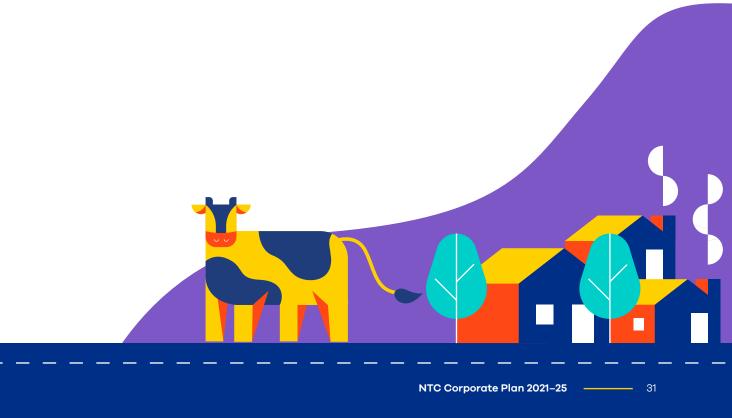
Desired outcome	Performance indicator	Target	Assessment methodology/source	2021-22	2022-23	2023-24	2024-25
The NTC's reforms improve safety, productivity, environmental outcomes and regulatory efficiency, and provide for future technologies.	Evaluations of the impact of the NTC's reforms (once implemented) show clear evidence of value provided.	All NTC reforms evaluated are shown to have been beneficial.	An assessment of the key findings of evaluations undertaken in developing the National Transport Reform Implementation Monitoring Report and (where available) by third parties such as the Productivity Commission.		<b>∀</b>	<b>✓</b>	<
The NTC's reforms improve safety, productivity, environmental outcomes and regulatory efficiency.	The statutory review of the NTC confirms that the organisation delivers on the objectives specified in the Inter-Governmental Agreement for Regulatory and Operational Reform in Road, Rail and Intermodal Transport.	The review recognises the NTC as highly valuable and recommends for it to continue operation.	Results of the six- yearly statutory review of the NTC (as required under s 51 of the National Transport Commission Act).	Next review scheduled for 2026			ed

#### Our performance measures

Desired outcome	Performance indicator	Target	Assessment methodology/source	2021-22	2022-23	2023–24	2024-25
The NTC's reforms deliver high value for Australia's transport system.	The NTC develops policy reform proposals that are demonstrated to offer high value.	Clear evidence is provided of the expected benefits for all policy reform proposals.	Quantitative (total net present value) and qualitative assessment of anticipated benefits including as assessed through regulatory impact statements.	<u> </u>	<u>~</u>	<u> </u>	<u> </u>
The NTC's program of work is delivered in line with the ITMM expectations, enabling them to achieve their strategic objectives.	The NTC's recommendations are relevant and valuable enough to the ITMM to be agreed.	At least 90 per cent of NTC recommendations presented to the ITMM are agreed.	A count of the NTC recommendations provided to the ITMM (using NTC program records) against the recommendations agreed by the ITMM (based on minutes issued following the meeting).	<u>~</u>	~	<u>~</u>	~
The NTC's program of work is delivered in line with the ITMM expectations, enabling them to achieve their strategic objectives.	The NTC delivers its ITMM-agreed projects on time and within budget.	At least 90 per cent of projects are completed on time and within budget.	A count of projects completed (using NTC program management records and papers submitted to the ITMM) compared against the approved annual work program and budget.	<u>~</u>	~	<u>~</u>	~
All legislation that the NTC is responsible for is kept contemporary and consistent with its policy intent.	The NTC delivers a comprehensive program of legislative reviews and amendments.	At least five legislative amendment packages are submitted to the ITMM each year.	A count (using NTC program management records and papers submitted to the ITMM) of amendment packages submitted to the ITMM.	<u>~</u>	<u>~</u>	<u>~</u>	<u>~</u>
Land transport reforms agreed by the ITMM are implemented in an efficient and nationally consistent way.	The NTC consistently monitors and promotes the successful implementation of land transport reforms.	The National Transport Reform Implementation Monitoring Report is provided annually and includes: • the status for each jurisdiction of all land transport reforms being implemented • recommendations to address any barriers to successful implementation.	A review of what the NTC submitted to the ITMM to confirm that the National Transport Reform Implementation Monitoring Report was provided annually and meets the target criteria.	<u> </u>	<u> </u>	<u> </u>	<u>~</u>



Desired outcome	Performance indicator	Target	Assessment methodology/source	2021-22	2022-23	2023-24	2024-25
Land transport reforms agreed by the ITMM are implemented in an efficient and nationally consistent way.	All NTC reforms are proposed with a clear implementation pathway.	100 per cent of NTC regulatory amendments presented to the ITMM have an implementation plan that includes outputs, timeframes and accountabilities.	A review of all NTC reforms submitted to the ITMM (using NTC program management records and papers submitted to the ITMM) to confirm implementation plans that meet the criteria were provided.	<u>~</u>	<u>~</u>	<u>~</u>	~
The NTC's reform proposals are robust and workable due to extensive engagement with all relevant stakeholders.	The NTC receives positive feedback in its stakeholder survey on how the organisation engages.	Demonstrated improvements on the previous stakeholder survey.	A two-yearly stakeholder survey of government and private sector stakeholders conducted and analysed by an independent consultancy.	<u>~</u>		<u>~</u>	
The NTC has the capability to deliver its program of work through engaged staff who support a culture of performance.	The NTC's staff engagement survey results are positive.	An increase from the previous survey in overall staff engagement.	An annual staff engagement survey conducted and analysed by an independent consultancy.	<u>~</u>	<u>~</u>	<u>~</u>	<u>~</u>



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