

30 August 2019

National Transport Commission
Level 3/600 Bourke Street
Melbourne Vic 3000
Via: ntc.gov.au/submissions/

AGF Submission to Safe People and Practices

The Amy Gillett Foundation (AGF) welcomes the opportunity from the NTC to consider Safe people and practices in this review of the Heavy Vehicle National Law (HVNL). The AGF is a national organisation with a mission to reduce the incidence of serious injury and death of cyclists in Australia. We draw on evidence and international best practice, and collaborate with governments, business and the community to create a safe environment for cyclists, while maintaining an efficient road network for all road users.

Safety is the primary concern for the AGF. Specifically in relation to heavy vehicles, we are currently delivering Sharing Road Safely, a training program for heavy vehicle drivers developed to increase the awareness and safety of vulnerable road users. Based on the international best practice driver training program developed in the United Kingdom as part of the CLOCS program, the AGF is working with the Victorian State Government to deliver the program to driver across Big Build major projects. We are also working with other jurisdictions to deliver demonstration programs and with the National Road Safety Partnership Program to develop a nationally accredited program, CLOCS-A to bring the successful UK approach to Australia.

Driver attitude and the broader driver culture can be very difficult to shift. However, Sharing Roads Safely is already having a positive impact of drivers' awareness, behaviour and attitudes towards vulnerable road users. In this submission we have provided details of the program and how it might fit into a safe practice in the heavy vehicle industry in relation to driver training, licensing and culture. In addition, we draw your attention to the [program](#) of the upcoming Australasian Road Safety Conference to be held in Adelaide, 25-27 September 2019 where there are several presentations on heavy vehicles and safety.

We welcome engagement on issues related to the safety on our roads and encourage you to contact us if you have any questions or require additional information.

Yours sincerely



Dr Marilyn Johnson
Acting Chief Executive Officer
Amy Gillett Foundation



Sharing

Roads

Safely

Q1: Have we covered the issues relating to safe people and practices accurately and comprehensively? If not, what do we need to know?

Q2: What aspects of safe people and practices are currently regulated well? What needs to be regulated better? What aspects of safe people and practices are currently regulated well? What needs to be regulated better?

We trust that the NTC are familiar with the world leading approach to heavy vehicle safety developed in the United Kingdom, through the two approaches FORS (Fleet Operator Recognition Scheme) and CLOCS (Construction Logistics and Community Safety). This international best practice approach was co-designed by the UK Government through Transport for London and the heavy vehicle industry and covers regulation and industry including driver training, vehicle standards, site and route planning. There is currently a Memorandum of Understanding between the State Government of Victoria and Transport for London. Discussions are underway to develop an Australian version of CLOCS, currently being referred to as CLOCS-A.

Q3: What should the future HVNL do to regulate safe people and practices so heavy vehicle drivers and others are safe? What risks are adequately managed by other regulatory controls? Are there any risks to the safe driver that are not currently regulated at all, and if so, how should these risks be regulated?

There may be a role for regulation and the requirement of all heavy vehicle drivers nationally to complete a vulnerable road user course that includes an on-road component. Over the last decade, the UK course has been delivered over 100,000 times and this has had measurable reductions in road safety outcomes.

Q5: How can the HVNL support better training and a higher level of driver competency? How can it support ongoing professional development?

It can support better training in several ways:

- Require vulnerable road user awareness training as part of national heavy vehicle driver licence
- Recognise and accredit high quality vulnerable road user awareness training courses such as the AGF Sharing Roads Safely (details below)
- Actively support and not introduce barriers to a centralised licensing system that allows drivers to easily comply with licensing and training requirements across jurisdictions

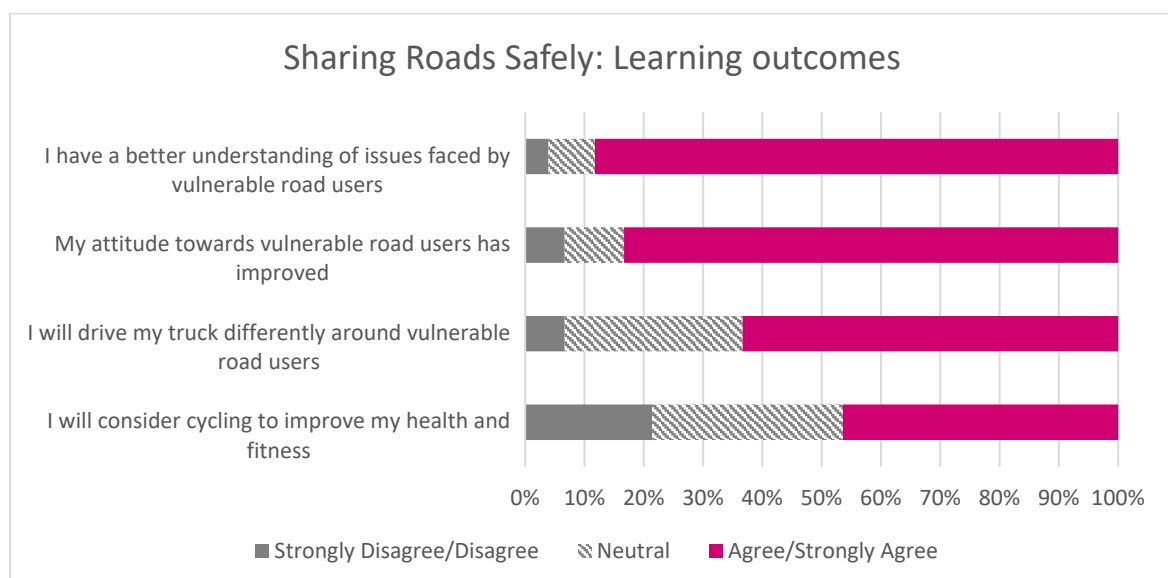
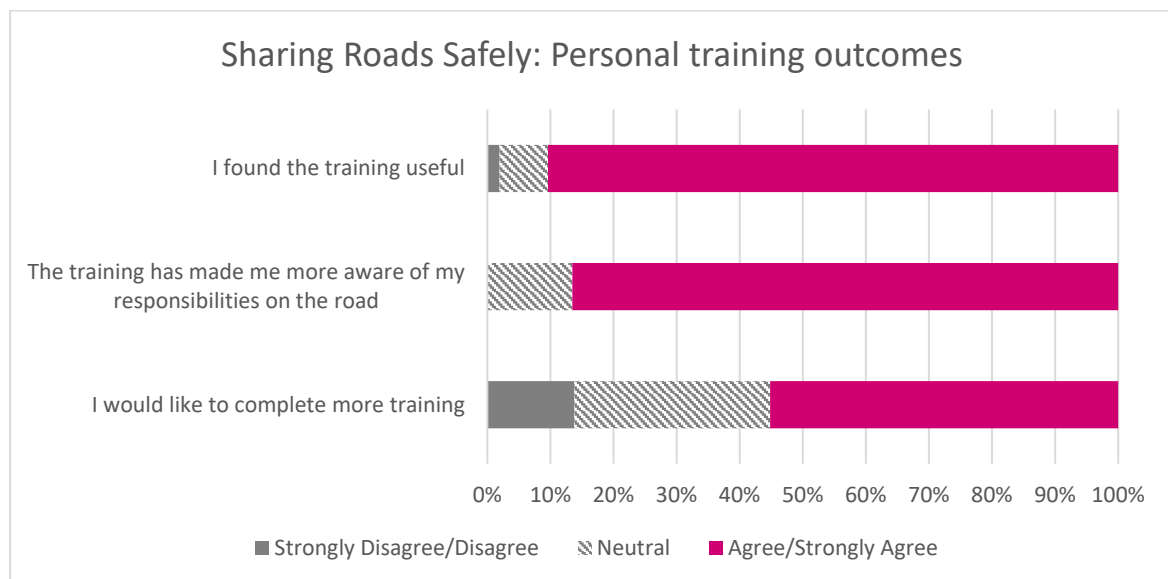
In Australia, the AGF led the adaptation of the CLOCS driver training program (Safe Urban Driving) for Australian roads called Sharing Roads Safely. Developed in consultation with over forty representatives from the heavy vehicle industry and the Victorian State Government, the program has been delivered in three locations across Melbourne since September 2018. A short overview video of the course can be seen by clicking the image above or this [link](#).

The program is designed to improve driver awareness of vulnerable road users, namely pedestrians, cyclists and motorcyclists. The program structure has three modules as described in the table (right).

| Sharing Roads Safely: program description | |
|--|--|
| Module 1 Online ~20 mins | <ul style="list-style-type: none"> • Introduces the Safe System approach • Sets up foundation that ‘everyone makes mistakes’ • Includes key scenarios involving all vulnerable road users • Safe actions to minimise risk • Quiz questions |
| Module 2 Facilitated workshop 2 hours | <ul style="list-style-type: none"> • Interactive activities that address: • Safe route planning • Safe behaviours when sharing the road with vulnerable road users • Safe vehicle equipment and technology • Original video stories from: • Driver who was involved in a fatality crash with a motorcyclist • Family member of a cyclist killed in a crash with a turning truck |
| Module 3 On-road practical 2 hours | <ul style="list-style-type: none"> • Off-road skills test • 2-3km ride on public roads including pedestrian activity • Debrief |

Driver feedback

Drivers complete an evaluation form at the end of the course and are reporting positive changes including improved knowledge, awareness and attitudes. The two charts included below provide an overview of drivers' feedback on the personal training and learning outcomes of Sharing Roads Safely.



Q7: Should heavy vehicle driver licences be national? If so, should this be by mutual recognition, nationalism or some other approach? If licences shouldn't be national, why not? Should licensing progress subject to experience rather than arbitrary timeframes?

We support a national heavy vehicle driver licensing system. However, while a national approach is preferable on paper, we appreciate that there are likely to be implementation issues that may delay or derail attempts to have one system. Also, there seems to be a prima facie case for licensing progress based on experience rather than timeframes. However, there would need to be a simple and accurate mechanism to measure and report on such a requirement.

From the perspective of the safety of people outside the trucks, the mechanism is less important than the outcome. We support a system, mutual recognition or national, that requires all heavy vehicle drivers to complete vulnerable road user training that includes an on-road component.

Q11: How can the future HVNL nurture a culture that places a high level of importance on safety?

By clearly reinforcing the messaging of the Safe System approach, the safety is a shared responsibility and that **we will all make mistakes**. This has been the most important message in our experience in truck driver training. Consistency across all stakeholders in the road safety space to continually reinforce the need for all of us to take care on the roads.