

## TLI Driving Instruction – Stakeholder Feedback

### Consultation 10 December 2021

#### Feedback submitted – 7 February 2022 by the Centre for Accident Research and Road Safety (CARRS-Q) and the Australasian College of Road Safety (ACRS)

Submission to the Australian Industry Standards concerning the newly proposed course, TLI41221Y Certificate IV in Driver Training.

This submission concerns car driving instructors. Feedback is provided on the qualification and the impact on training outcomes for car driving instructors. Specific comments on the three specialised units (TLISS00162Y Driving Instructor Skill Set) are also provided.

The Centre for Accident Research and Road Safety (CARRS-Q) and the Australasian College of Road Safety (ACRS) hold concerns regarding the level of expertise anticipated to be diminished by combining the skill requirements for car driving instructor training with heavy vehicle and motorcycle instructor training, particularly loss of specificity to instruction of young novices, who require significantly different knowledge and skill sets relative to experienced drivers extending to additional licences. The proposal and argument for change do not appear to be motivated by road safety outcomes. The units that make up the qualification for car driving instructors should not be generalised and minimal. The proposal reduces the current 12 units to eight, with five broad skills amalgamated with heavy vehicle and motorcycle instruction and only three specialised units for car driving instruction. Australia is already behind concerning current practices in instructor training, let's not make changes which make it even worse.

In a sector that is driven by safety and underpinned by a vision to eliminate all fatalities and serious injuries from road trauma, the argument for this change is conflicting. We do not believe the Australian population want those charged with training young and novice drivers to be less trained and knowledgeable on this specific population. The car driver training industry, who have been consulted by CARRS-Q and the ACRS regarding the proposed changes, has not called for a more leisurely route into the industry. Australia has seen a rapid increase in the registration of new driving instructors under the current accreditation training, as those losing work elsewhere in response to the global pandemic turn to this as a seemingly ready option (Department of Transport and Main Roads, personal communication, 2021). Additionally, Government funding of up to \$2,200 via the Skills Checkpoint Older Workers program further encourages over 40s to readily access this specialised industry regardless of previous experience and competence [1]. The capability to ensure young learners are taught how to stay safe – not just pass their licence tests – is far more complex than realised [2], with current insufficient registration requirements being further simplified to meet industry demands.

Some Registered Training Organisations (RTO) offer the current TLI41221 Certificate IV in Transport and Logistics [Road Transport - Car Driving Instruction] to be completed in 10 days to 2 weeks. While it is recognised that the content included in the previous 12 units has been acknowledged in the three new specialised areas for car driving instructors, it is not plausible that these three units could be completed, including theoretical and practical training and assessment, in the short time frames currently offered by state government approved RTOs. A professional instructor is defined by the Department of Transport and Main Roads in Queensland as a learner driver trainer with the capacity to develop competent and safe drivers by training according to individual learner needs [3]. However, instructor accreditation requirements are minimal, including an already broad qualification for any car-related training.

While the wording change to 'low risk' as opposed to 'safe' is a positive change, there is still too much focus associated with industry requirements and not enough on actual skill sets required. There is assumed knowledge about what are low risk behaviours, and assumptions about RTOs and instructors knowing what these skills are and how to teach them in a driving context. One element of the course description states, "provide **some** leadership and guidance to others in applying skills" (emphasis added). Given this is the key role of an instructor, there should be more weight to this statement and suggest removing "some" from this

description to recognise an instructor **should** develop capacity to provide leadership and guidance in developing low-risk driving behaviours in others.

The removal of the courses (which are noted as integrated into the three specialised units for car driving instruction), design and develop learning programs and manage personal work priorities and professional development, are critical skills that should not be minimised and integrated into other units. Planning learning programs that are specific to the needs of not only young learner drivers but also those who have learning difficulties and/or physical or other mental challenges require explicit training that should not be simplified. In regard to managing professional development, this is a major flaw recognised in the industry. There is no evidence-based, accessible professional development for car driving instructors. The Australian Driver Trainer Association and Intelligent Training Solutions have made efforts to initiate this on some level, however, the skills that need to be upgraded with existing instructors, particularly those who have been in the industry for 10, 15, or 20 years, for example, are not readily available. Furthermore, the opportunities for continual professional development rely on self-sourcing or are dependent on driving schools sourcing and providing these opportunities. The industry has been neglected for too long and is deserving of attention rather than allowing new accredited instructors to enter the industry under-qualified.

### **Comments on specialised units**

The language used is non-specific allowing for requirements to be open to interpretation by RTOs. While this is acceptable where RTOs are well-established with up-to-date knowledge of the industry requirements and aim to deliver with the appropriate goals in mind (saving novice drivers' lives), there are RTOs who will, and have, take/n advantage of the non-specificity of the performance and knowledge evidence. For example, an RTO's knowledge of higher-order instruction and how this can be observed is questionable given the limited available evidence on this topic, yet considered imperative for novice safety.

#### ***TLIC3036Y Apply low risk car driving behaviours (vehicle operation)***

This unit contains a thorough list of high-level knowledge requirements, yet it is not clear how some of these skills will be identified in practice. Some RTOs offer the current 12 units to be completed in 2 weeks, but we suggest that this course cannot be completed in any detail within this timeframe. There are complex knowledge requirements let alone the need to apply that knowledge. As a comparison of current practices in instructor training in jurisdictions with strong road safety records, countries such as Norway require a minimum of two years full-time study prior to receiving accreditation as an instructor, contributing to their lowest road crash fatality rates globally [4; 5].

This unit focuses on the instructors' own ability to engage in low-risk driving. While this is an important foundation skill and prerequisite to train as a car driving instructor, a stronger focus on how to teach these skills to learner drivers should be the priority. The focus should be on the capacity to teach these skills and achieve learning outcomes in others.

The generalisability of performance requirements could lead to RTOs assigning very simple tasks to complete and check off as qualified. The necessary detail involved in learning these skills would take time for an aspiring instructor with some training/education-related background let alone a learner instructor with an unrelated background. Indeed, relatively inexperienced drivers, particularly including a young person, applying to be accredited as an instructor would especially struggle to comprehend this amount of knowledge in a short timeframe.

Research shows some instructors have good knowledge of higher-order skills yet do not apply this in learner driver lessons as they lack the skill set to deliver this level of training [6; 7]. Importantly, the large majority of instructors are aged 40-60 years and have never been exposed to this content of training. Therefore, training in this way without recognition of the need to upskill existing instructors creates critical inconsistencies in the quality of training for learner drivers.

#### ***TLIM0001Y Conduct driver training (training and assessment)***

This unit applies adult learning principles whereas the unique learning needs of a 16 or 17-year-old learner driver, amongst other individuals, needs to be recognised. Their self-regulation is not reflective of internal/intrinsic motivation for safe driving and is still developing, with their tendency to take risks needing to be compensated for [8]. This can be achieved through informed training, which this is one of the only readily existing options to do so.

This unit includes multiple performance outcomes that suggest an instructor must engage in a particular manner, without reflecting that the course train them on strategies concerning **how** to achieve these goals. For example, the unit aims to train instructors how to recognise and be sensitive to diversity yet there is no knowledge or performance aim regarding how to be sensitive to the range of differences in society in order to be competent in this learning goal. Coaching has been identified as best-practice in driver training across Europe and recently by industry members in Australia [9;10]. There are coaching strategies that can and should be taught to aspiring instructors to be able to apply the skills included across all units to all (diverse) learners. Coaching is not an identified skill in the amalgamated qualification.

Critically, there also appears to be a lack of awareness of some of the largest contributors to young driver fatality crashes, such as distraction [e.g., 11]. Although this may be interpreted in some of the overarching and general topics required in knowledge and performance, this must be included as a specific topic. Research has found that, although instructors are aware of the importance of distraction, it is not taught/coached/incorporated into lessons [7].

#### ***TLIM4001Y Develop low risk car driving behaviours in other (training and assessment)***

Again, there is a long list of complex skills that are required to be learnt in this unit and, unless RTOs are mandated to conduct this course over a longer timeframe it seems implausible that these critical skills can be taught and learnt in a short timeframe. For example, the psychology of low-risk driving is included in this unit amongst many other skills. This is also an element of Norway's two-year course where the psychology of driving is a course that spans the two years.

Another performance outcome included in this course is to be able to provide constructive feedback to high-risk drivers. This is a critical skill that industry has been calling out for how and we appreciate the inclusion of this. However, again this seems to be a watered-down version of what would need to be taught and requiring an extended timeframe.

#### **Attention to young drivers is needed**

As such there is *no* unique attention to young drivers. Despite the comparatively small amount of time professional instructors spend training the Learner – an average of nine to ten lessons [12; 13] - there are implicit expectations that professional instructors teach safe driving practices. For example, within the 100 hours of mandated supervision in Queensland and the ACT, one hour of professional instruction is recorded as three hours in the logbook (capped at 30 recorded hours), suggesting an inherent value in professional instruction [14, 15].

The deficit in instructor training negatively impacts the learner driver population who receive ad hoc training, with evidence suggesting their training focuses on developing learner driver vehicle manoeuvring skills required to pass the on-road practical driving test, with limited evidence that this test is associated with safe driving outcomes nor that this focus of training concerns long-term safety [16; 17]. Professional instructors recognise important safety-critical skills, such as situation awareness, nonetheless are challenged to balance satisfying customer needs (usually the parent), to pass the test, with developing safer young drivers [6; 18; 19].

Young drivers are persistently over-represented in road crash fatalities and serious injuries and the opportunity to reduce their crash risk via training is greatly overlooked. One young person is lost on Australian roads every second day with newly licensed drivers at least three times more likely to be in a crash compared to more experienced drivers [20]. This is primarily due to underdeveloped critical driving skills [21]. The seemingly intractable issue of young, newly licensed drivers being over-represented in road trauma has exacerbated in this time of global pandemic, with evidence that lack of critical judgment and self-regulation

skills are key contributors [22; 23]. The capability to ensure young learners are taught how to stay safe – not just pass their licence test – is far more complex than realised, with no guidelines for instructors and parents to teach safety-critical driving skills. That is, the better instructors know what to do but are not taught how to do it.

## Conclusion

Developing safety-critical skills during supervised learning has significant potential to reduce young driver road trauma and the associated substantial social and economic costs; with an estimated \$4.3 million cost per fatal crash [20]. It is essential that the lack of standards and minimal accreditation processes for the professional instructors are confronted. This is not a call to increase accreditation to years of training, but rather, the reduction from the current level of training for car driving instructors cannot be supported. The authors of this document are willing to collaborate with Industry to rectify shortcomings. This is a focus of research at the Centre for Accident Research and Road Safety Queensland (CARRS-Q) at the Queensland University of Technology (QUT) currently under evaluation to provide evidence-based practice-ready training modules.

Professional driving instruction is arguably a deregulated industry, with regulation administrative in nature, and absent are quality checks necessary to ensure a high standard of instruction competencies and best practice in teaching safe driving practices to Learners. The Learner phase is opportune for developing the necessary safe driving practices for independent driving, and research demonstrates instruction could provide these skills [24; 25]. Professional instructors need guidance and skills to attend to the complexity of the young driver and we strongly suggest that the proposed changes to the accreditation training be re-considered.

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*The Centre for Accident Research and Road Safety – Queensland (CARRS-Q) is one of the leading centres in Australia dedicated to research, education and advocacy in the areas of road safety and injury prevention. It was established in 1996 as a joint venture of the Motor Accident Insurance Commission (MAIC) and the Queensland University of Technology (QUT). The mission of the centre is to reduce road trauma at the local, national, and international level, by conducting innovative research and delivering high quality education programs to practitioners. CARRS-Q works collaboratively with strong networks in the road safety and injury prevention fields. The Centre has successfully developed and maintained a strong research and consultancy profile, and collaborative research linkages and activities with government, other universities, commercial organisations and cooperatives.*



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*The Australasian College of Road Safety is the region's peak membership association for road safety with a vision of eliminating death and serious injury on the road. Our members include experts from all areas of road safety including policy makers, health and transport professionals, academics, community organisations, researchers, federal, state and local government agencies, private companies and members of the public. The purpose of the College is to support our members in their efforts to eliminate serious road trauma through knowledge sharing, professional development, networking and advocacy. Our objectives include the promotion of road safety as a critical organisational objective within government, business and the community; the promotion and advocacy of policies and practices that support harm elimination; the improvement of relative safety outcomes for vulnerable demographic and user groups within the community; the promotion of post-crash policies and practices; and the promotion of a collegiate climate amongst all those with responsibilities for and working in road safety.*

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