

## 2018 Consultation Process on Driver Competency – Response

Thank you for the opportunity to contribute to the Driver Competency Process. The AALS Safety Committee document “Driver Competency Authoring Committee Terms of Reference May 2018” has been discussed by the SLSLS Board of Directors as have the links within relating to applicable sections of the Code of Practice and 2008 Guidance Letter.

We agree:

1. The issue of deteriorating competence due to advancing age or other physical conditions may present a “hazard”.
2. The hazard should be identified, risk assessed, and appropriate controls put in place.
3. A guidance document may be useful to benchmark Best Practice and provide a source of inspiration to those formulating procedures within an individual Society.

We do not agree that:

1. A detailed “checklist and procedures” is a suitable format for a Guidance Document.
2. “Drivers” should be singled out of the many competencies individual Societies may or may not draw upon to meet the demands of a safe operation.
3. A Guidance Document is of benefit unless it assists individual Societies to make their own judgements and initiate their own actions with “dignity, respect, fairness and transparency”.

We recommend:

1. The Guidance Document avoids specific instructions, procedures and checklists that can be open to interpretation by outsiders with unknown agendas (e.g., attempting to prove negligence).
2. The Guidance Document encourages the reader to see a wider spectrum of behaviours that should be observed / managed if required, to ensure safe and satisfactory interactions with the families and children attending the Society grounds.
3. The Guidance Document refers to one or more methodologies currently followed by well managed Societies as a model(s) of choice.

Comments:

We note the “Specific Considerations” make mention of the “subject’s sensitivities” and require that the matter of this nature be dealt with.

It is difficult to see how a detailed “checklist and procedures” would humanise the way such issues are dealt with.

Among 80+ AALS affiliated Societies, individual operations differ greatly. Competency is “subjective” rather than “objective” and relates directly to the requirements of the specific location.

Would a list of specific items prepared by persons remote from the action serve to assist or just further frustrate the people best placed to know their requirements?

A successful Guidance Document should be read by an individual Society’s leadership, drawing broad attention to matters such as:

- Ability to operate Locomotive or Road Vehicle in accordance with accepted practices.
- Ability to follow operating procedures as prescribed by the Society for the relevant occasion.
- Ability to interact with children and parents effectively without causing offence or discomfort.
- Ability to perform task without undue risk of physical injury to self or others.
- Ability to conduct one's self in a manner "normally acceptable" in a public place.
- Ability to react calmly and appropriately to an incident or emergency.

Industry Standards in 2018 encourage Behavioural Safety Programs which aim to empower employees to speak to workmates if dangerous behaviour is displayed. These programs help remove the barriers to initiating those conversations. These programs are proven more effective than writing procedures and burying them in documents.

SLSLS example:

At SLSLS, over ten thousand people visit the grounds per annum and partake in up to thirty thousand train rides. We follow typical OH&S practices to measure our injury rate, record incidents and focus on areas of reduced safety.

The running day operations are unobtrusively monitored by the Directors who are active participants in the proceedings. Any matters arising are discussed and handled quietly, in-house in a non-confrontational fashion.

A Competent Person Register is discussed by the Board of Directors annually and updated accordingly. Competencies encompass all key roles in the running of the railway. In practice, we notice aging persons usually voluntarily remove themselves from a duty that they no longer feel comfortable performing.

Should the occasion arise where a member may be observed to be unsuitable in a role, the matter may be discussed formally or informally by the Directors and a solution agreed. Such solutions may be: -

- Ensuring assistance is available
- Asking the person to help in a different capacity
- Reminding the person of their physical condition and offering to help
- Asking another person to partner for the task
- Encourage acceptance of a regular relief driver / assistant