

Transport for NSW

Community Transport Driver Authorisation

DISCUSSION PAPER DECEMBER 2011



Transport
for NSW

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1 BACKGROUND AND PURPOSE

There are more than 120 community transport operators across NSW, providing transport for the frail aged, the disabled and their carers and the transport disadvantaged. Transport for NSW administers Home and Community Care (HACC) funding to these operators on behalf of Ageing, Disability and Home Care in the Department of Family and Community Services. In addition, funding is available to these groups under the Community Transport Program. Community transport operators engage paid and volunteer drivers and it is estimated that each year they provide approximately two million trips to eligible clients.

The NSW Liberal/National Government is committed to the co-ordinated delivery of transport services across all modes, with a renewed focus on the customer. As part of this commitment, the Government has allocated an extra \$12 million over four years to support the community transport sector so that it can respond to anticipated changes in service demand and improve services for community transport users.

In NSW, people are living longer and the proportion of the population aged 65 and over is projected to increase – from 13.5% in 2006 to 20.6% in 2031 and 22.8% by 2051. The actual numbers of people aged 65 and over will increase from 0.9 million in 2006 to an estimated 1.8 million in 2030 and 2.2 million by 2051, some 480,000 of whom will be aged 85 years and over by 2051¹.

With this shift in demographics, demand for community transport services will increase and the sector will deliver a larger proportion of the transport service task. The Government recognises the need to support the development of the sector so that it can respond to these anticipated changes. While to date, no major concerns have been raised about the safety performance of community transport, parts of the sector believe existing provisions should be strengthened and that drivers should be authorised, as are drivers of public passenger services (eg. buses, taxis and hire cars). In this context, the Government has agreed to strengthen the safety framework for delivery of community transport services by introducing an appropriate driver authorisation framework.

Some industry stakeholders have also expressed a preference that operators be accredited under the *Passenger Transport Act 1990* and the Minister for Transport has indicated this will be considered. However, the Government's priority is to firstly establish the framework for driver authorisation and will consider accreditation in the coming months.

The Government's intent in introducing an appropriate driver authorisation framework is to enhance the safety of community transport in NSW. While the Government recognises the unique nature of community transport, its agreement to introduce driver authorisation is on the basis that all customers will benefit from any additional requirements. On that basis it is the Government position that all drivers should be captured by the authorisation framework.

The challenge in developing an appropriate authorisation framework covering all drivers is to balance concern about its potential impact on community transport operators alongside

¹ Source: 3222.0 Populations Projections Australia TABLE B1. Population projections by age and sex, NSW – Series B (medium) Australian Bureau of Statistics 2008

the intent to strengthen the safety framework underpinning their operation, particularly given the forecast growth in the older population and the likely increase in demand for community transport services.

This discussion paper has been prepared as the basis for consultation to assist Transport for NSW in developing a community transport driver authorisation framework. The paper:

- outlines driver authorisation for public passenger services, its purpose and requirements;
- confirms the objective of community transport driver authorisation;
- identifies existing requirements on community transport drivers and arrangements in other jurisdictions; and
- proposes options for community transport driver authorisation.

A Feedback Form has been provided to assist you in addressing the key questions raised in this Discussion Paper. Stakeholders are invited to fill out the feedback form and comment on the options to identify which one they believe will best deliver improved safety while at the same time ensuring the ongoing sustainability of the sector.

Your Feedback Forms and any additional comments are welcome and can be sent to ctfeedback@transport.nsw.gov.au or to postal address:

**CT Feedback
PO Box K659
Haymarket NSW 1240**

Please note submissions close on Friday 3 February 2012.

If you have any enquires about the Discussion Paper or the consultation process, please direct them to ctfeedback@transport.nsw.gov.au or call Angela Adams, Senior Policy Officer, Transport Policy and Regulation on 8202 3821.

For the purposes of this discussion paper, the following definitions apply:

Community Transport Organisation – the peak advisory and consultative body for community transport issues in NSW.

Community transport operator – an organisation which provides targeted transport services for the frail aged, the disabled and their carers and the transport disadvantaged. There are more than 120 community transport operators in NSW.

Community transport driver – a paid employee or volunteer engaged by a community transport operator to drive a vehicle for the purpose of providing targeted transport services for the frail aged, the disabled and their carers and the transport disadvantaged.

Community transport service – a targeted service provided by a community transport operator for the frail aged, the disabled and their carers and the transport disadvantaged. Community transport services are not available to the general public.

2 AUTHORISATION FOR DRIVERS OF PUBLIC PASSENGER SERVICES

Under road laws, before driving a motor vehicle on a public road a person must obtain a driver's licence for the vehicle they wish to drive. This involves passing the various training requirements which apply to the licence type. Roads and Maritime Services (RMS) must also be satisfied that all licence holders are medically fit to drive. The law requires the holder of a drivers licence to notify RMS, as soon as practicable, of any long term injury or illness that may impair his or her ability to drive safely. A licence holder can be directed to have regular medical examinations because of a medical condition or because of advanced age. Some drivers must also have an annual driving test.

Additional requirements are imposed on those who drive public passenger vehicles to determine if they are fit and proper. In NSW the drivers of public passenger vehicles, for example buses, taxis and hire cars, are required to be authorised by the Director General of Transport for NSW.

As well as being subject to a criminal records check, an applicant for a Transport for NSW driver authority must hold an unrestricted NSW drivers licence for the relevant vehicle type, and have held an Australian drivers licence for at least 12 months in the previous two years. Applicants for authorisation must also:

- satisfy the Director-General that they are medically fit, which includes undergoing a medical examination, with the possibility of being asked to undertake specialist assessments;
- Have sufficient aptitude and responsibility to drive a public passenger vehicle in accordance with law and custom;
- Undertake additional training for bus and taxi driver authorities; and
- Comply with all provisions of the *Passenger Transport Act 1990* and the Regulation.

The Act provides for penalties for non-compliance, which may include suspension or cancellation of the authority, the issuing of infringement notices, retraining at the driver's own cost, or prosecution, if it is a requirement of authorisation.

Part 4 of the *Passenger Transport Regulation 2007* outlines the general obligations common to all drivers of public passenger vehicles and covers matters such as driver conduct, dress, vehicle maintenance, driver training, lost property and the carriage of goods and animals.

This section of the Regulation also stipulates obligations with regard to driver authority cards, notifying Transport for NSW of alleged offences and undergoing medical assessments.

Specific obligations and expected conduct of drivers of certain public passenger vehicles are also contained in the *Passenger Transport Regulation 2007*. For example, in addition to the general obligations summarised above, drivers of taxi cabs are also required to comply with certain additional requirements which govern duties specific to taxis such as the maintenance of worksheets, uniforms and use of taxi zones.

Drivers of buses, private hire vehicles and tourist services as well as ferry masters are subject to similar obligations relevant to the services operated. These obligations are also contained in the Regulation.

The *Passenger Transport Regulation 2007* has provisions for Transport for NSW to issue penalties to drivers for non-compliance of obligations specified in the legislation. Penalties can range from fines to authorisation suspension, cancellation and in some cases prosecution.

As is the case for public passenger services, the Government's objective in agreeing to introduce driver authorisation for community transport is to ensure drivers are fit and proper. However, it is not considered appropriate for community transport drivers to be subject to the same range of penalties as public passenger vehicle drivers. Should community transport driver authorisation be introduced, a less onerous approach would be considered, potentially involving the suspension or cancellation of authorisation for drivers.

3 EXISTING ARRANGEMENTS

3.1 *Current Community Transport Driver Requirements*

There are already considerable requirements which apply to community transport organisations and their drivers which address the objectives of driver authorisation.

Firstly, community transport organisations must comply with current workplace health and safety legislation which imposes a general duty on employers to, so far as is reasonably practicable, ensure the health, safety and welfare of all employees. This requirement extends to paid employees, volunteers and clients.

Under national model workplace health and safety legislation which will apply in NSW from January 2012, a community transport operator as “a person conducting a business or undertaking” will have a primary duty of care to ensure the health and safety of workers and others in the workplace. Furthermore, drivers (paid or volunteer) will be classified as workers and will therefore be required to:

- care for their own and others’ health and safety;
- comply with any reasonable instruction from the person conducting a business or undertaking, so far as they are reasonably able; and
- co-operate with all reasonable policies and procedures.

Drivers must also be licensed to drive the vehicles they use in providing community transport, obey road traffic rules and the vehicles they drive must be registered. These requirements are contained in the following:

- *Road Transport (General) Act 2005*
- *Road Transport (General) Regulation 2005*
- *Road Transport (Safety and Traffic Management) Act 1999*
- *Road Transport (Safety and Traffic Management) Regulation 1999*
- *Road Transport (Driver Licensing) Act 1998*
- *Road Transport (Driver Licensing) Regulation 2008*
- *Road Transport (Vehicle Registration) Act 1997*
- *Road Transport (Vehicle Registration) Regulation 2007*

Additionally, when community transport operators enter into funding agreements with the Director General of Transport for NSW they agree to ensure that:

- All vehicles are registered, safe, roadworthy, clean, undamaged, in good condition, operational and insured for third party property damage for \$10 million;
- All vehicles are maintained in accordance with manufacturer’s specifications;
- Records are kept of drivers’ full name/address/licence number and the dates and times the vehicle was driven;
- Drivers are proper, having regard to any criminal convictions;
- Drivers are competent, having regard to any driving offences;
- Drivers have a current licence;
- Drivers have satisfactorily undertaken such first aid training as the Director-General may determine; and
- The organisation and its staff do not advertise that they are accredited operators of public passenger services.

At present, the community transport sector is largely self-regulated with operators responsible to ensure the above conditions are satisfactorily met. Transport for NSW does not conduct checks or require operators to provide evidence of meeting the above requirements.

With regard to first aid training, the current conditions allow for a first aid driver training requirement. However, to date the Director General has not introduced such a requirement.

Other Jurisdictions

Queensland

At this stage Queensland is the only state where legislation requires community transport driver authorisation. Operators of community transport in Queensland may choose to use drivers who hold any category of Department of Transport and Main Roads issued driver authorisation or may issue a Restricted Driver Authorisation (RDA) themselves.

Other than RDAs, the categories of driver authorisation acceptable for community transport operators are those for taxi services, limousine services, general services such as charter, tourist and accommodation transfer, scheduled route and school services and motorcycle tour services.

If the potential community transport driver does not hold one of the above authorisations, the community transport organisation may choose to issue an RDA instead. In this circumstance, the applicant must meet the following requirements:

- Be legally entitled to work in Australia;
- Hold a current open driver licence;
- Have held a driver licence (open or provisional) continuously for at least three years;
- Not knowingly suffer from any medical condition that may effect their driving; and
- Be of a suitable character with regard to criminal convictions and driving offences.

Under this system, an applicant completes an RDA Notification form which is also signed by the issuing operator. In the form the applicant makes declarations regarding the above requirements. The Department of Transport and Main Roads then conducts criminal and driving record checks to confirm the applicant's eligibility to hold an RDA.

With regard to medical conditions, applicants are required to complete a section on their medical history but are only required to undergo a medical assessment if they answer "yes" to any of the health questions. Medical assessments (if required) are conducted against the criteria set out in the "Assessing fitness to drive for commercial and private vehicles" document produced by Austroads. These are the same criteria against which the health of applicants for other categories of driver authorities is assessed in all jurisdictions.

Successful RDA applicants are subject to the following conditions:

- RDA holders are restricted to driving for the issuing operator. (However, an

applicant may hold RDA's issued by different operators)

- A driver must carry evidence of the RDA (issued by the operator) on them at all times while providing the community transport service.
- If checks by the Department of Transport and Main Roads indicate the applicant has an unsuitable criminal, driving or medical history, before the RDA is issued, the operator is advised not to issue the RDA.
- If these checks indicate the applicant has an unsuitable criminal, driving or medical history after RDA has been issued by the operator, the Department of Transport and Main Roads will take action to amend, suspend or cancel the RDA.
- The Department of Transport and Main Roads may request the holder of an RDA to undertake a medical examination, if the department reasonably considers the medical fitness of the holder no longer meets the approved standard.

The Queensland *Transport Operations (Passenger Transport) Act 1994* provides exemptions from the requirement to hold driver authorisation if the service is not available to the general community or if two or less vehicles are used to provide the service and these vehicles can be operated by drivers with a regular class C driver's licence.

South Australia

South Australia has a Driver Accreditation Program for volunteers, but this is not a legislative requirement. The Program applies to drivers engaged by the 11 Community Passenger Networks which are funded by the Department for Transport, Energy and Infrastructure (DTEI) and the Home and Community Care Program (HACC) to facilitate access to transport for the transport disadvantaged in regional communities. To obtain accreditation, drivers are required to undergo a medical examination, National Police Clearance and driver assessment.

4 AN APPROPRIATE AUTHORISATION FRAMEWORK FOR COMMUNITY TRANSPORT DRIVERS

4.1 *Key issues for consideration*

The elements of the driver authorisation framework for public passenger services provide a useful starting point for considering what elements should comprise authorisation for community transport drivers. However, community transport differs in a number of ways to public passenger services:

- community transport is available to key target groups only, namely, the frail aged and people with disabilities and their carers and the transport disadvantaged. It is not available to the general community;
- the services community transport operators provide need to be sufficiently flexible to address the more dependent needs of many in the client groups; and
- many community transport operators, particularly in rural and regional areas, rely heavily on volunteer drivers.

Maintaining these characteristics is essential to ensure that transport services suitable to client needs continue to be available to the frail aged, people with disabilities and their carers and the transport disadvantaged. It is important therefore that the framework for driver authorisation is compatible with and supports the retention of these characteristics.

4.2 *Driver Authorisation Framework Elements*

There are three aspects that need to be considered in determining an appropriate driver authorisation framework.

- What requirements should authorisation impose on drivers?
- Which drivers should be authorised?
- How should the framework be established?

4.3 *What requirements should authorisation impose on drivers?*

As indicated above, community transport operators must currently be satisfied that their drivers:

- are proper with regard to criminal history;
- have a satisfactory driving record; and
- hold a current drivers licence.

Unlike authorised operators of public passenger services, community transport operators are not required to provide evidence of the above to Transport for NSW and their drivers are not subject to a specific medical examination.

Nevertheless, there are obligations on the drivers as licence holders to notify Roads and Maritime Services as soon as practicable, of any long term injury or illness that may impair their ability to drive safely.

Outlined below are three approaches for driver requirements that could be adopted as the basis for community transport driver authorisation.

4.3.1 No Change – formalise existing requirements as community transport driver authorisation

There is little evidence to date that the safety performance of the community transport sector is unsatisfactory and needing improvement. This suggests that current requirements may offer sufficient safety assurance for the services being provided. On that basis, one option is to maintain the following current requirements for as the basis for driver authorisation:

- proper, having regard to any criminal convictions;
- competent, having regard to any driving offences; and
- hold a current (i.e. not cancelled, suspended or expired) driver licence appropriate for the vehicle in question.

4.3.2 Authorisation to introduce strengthened medical requirements

Notwithstanding the sound safety performance of the community transport sector, as previously mentioned, there is a view that safety requirements should be enhanced. Specifically, it has been proposed that requirements similar to those for drivers of public passenger services should be introduced for community transport drivers. The case for this position is strengthened by the likelihood that the sector will in time play a larger role in the overall transport task. In terms of safety, a significant difference between requirements for community transport drivers and those of public passenger services is that the latter must pass a medical examination to be authorised.

The medical examination which applicants undergo is designed to provide Transport for NSW with information that will enable it to determine their fitness to drive a public passenger vehicle in accordance with the provisions of the *Passenger Transport Act 1990* and *Passenger Transport Regulation 2007*. Transport for NSW uses the commercial vehicle driver standards as defined by Austroads. As such, it is comprehensive in scope and designed to identify any conditions which may compromise a person's fitness to drive. If the Director General cannot attest to a driver being a fit and proper person, their authority may be suspended, varied or cancelled or their application for authorisation may be refused.

There appear to be two options as to how authorisation for community transport may adopt a requirement for medical examination. Firstly, all applicants could be required to undergo an examination as is required for public passenger services. Alternatively, as is the case for the Queensland's Restricted Driver Authority (RDA), people would only undergo medical examination where it was established on initial application that they did not meet the specified health criteria.

4.3.3 Community transport operators to use drivers who hold Transport for NSW driver authorities

As indicated above, in addition to issuing RDAs, community transport operators in Queensland may also choose to use drivers who hold any category of driver authority.

Rather than, or in addition to, creating a specific driver authorisation for community transport, another approach would be to require community transport operators to use drivers who hold either a specific community transport driver authorisation or any one of the existing Transport for NSW driver authorisations. It is important to note the community transport organisations in NSW are already able to use authorised drivers, which some do.

In addition to strengthening requirements on driver fitness through medical examination, consideration needs to be given to what other requirements authorisation should impose on drivers. The main objective of driver authorisation is to ensure drivers are fit and proper, and as such it may not be necessary as is done for public passenger drivers to specify, for example, requirements about drivers' dress and management of lost property. Conversely, the current funding agreement includes a provision that allows for the Director General to require drivers to satisfactorily pass a first aid course and inclusion of such a provision in authorisation requirements may be appropriate.

Questions

1. Are the existing requirements for community transport drivers a sufficient basis for introducing driver authorisation? Why/why not?
2. Should authorisation of community transport drivers include strengthened medical assessment? Why/why not? Which approach should be introduced?
3. Should authorisation include any additional requirements beyond this?
4. Are there any issues with community transport operators using drivers who hold driver authorisation for public passenger vehicles? If yes, what are they?

4.4 *Which drivers should be authorised?*

Community transport operates to provide services only for specific sectors of the community who have difficulty accessing or are unable to use mainstream public transport services. Community transport is different to public transport services as it is designed to address the needs of the target groups. On that basis applying the same or similar requirements to community transport drivers as those that apply to drivers of public passenger services may not be appropriate. Furthermore, many community transport drivers are volunteers, provide only part-time and often one-on-one transport assistance.

There is concern the imposition of stricter requirements is unnecessary and will make no appreciable difference to service quality. Furthermore, authorisation may lead to a reduction in volunteer participation in the program, through either a reluctance to be assessed against the requirements or through failure to meet them. Additionally, driver authorisation will impose additional administrative demands and costs on community transport operators.

The Government is seeking to introduce a driver authorisation framework that enhances the safety for community transport users in NSW while recognising that there may be cause to allow exemptions under certain circumstances to avoid placing unnecessary burden on the sector.

Authorisation Exemption in Queensland

The driver authorisation framework for community transport in Queensland provides a useful model of how to balance these imperatives. The Queensland *Transport Operations (Passenger Transport) Act 1994* requires all drivers of community transport services to be authorised unless exempted for the following reasons:

- The service is not available to the general community; or
- Two or less vehicles are used to provide the service and these vehicles can be operated by drivers with a regular class C driver's licence.

In Queensland, authorisation may be one of two types. Firstly Community Transport Operators may issue Restricted Driver Authorisation, the holder of which is restricted to driving for the operator who issued it. Only if applicants don't meet all the medical criteria in the RDA Notification form are they required to undergo medical examination. Applying this "triage" approach to determining when medical assessment is required provides for enhanced safety without imposing the requirement on all applicants.

Secondly, operators may also choose to use drivers who hold any category of Department of Transport and Main Roads issued driver authorisation. Applicants for such authorisations must undergo an examination to obtain a medical certificate for a commercial vehicle driver.

These provisions allow all community transport drivers to be captured in the authorisation framework but also provide exceptions for drivers operating under certain circumstances.

Questions

5. Are there any circumstances such as those which apply in Queensland where drivers of community transport services should be exempt from authorisation? Why?
6. What impact/s would your organisation likely experience if driver authorisation was introduced?
7. If driver authorisation is introduced, should volunteers be required to apply? If so, what impact would that have on your organisation?

4.5 How the framework is established

4.5.1 Legislate for Community Transport Driver Authorisation

The *Passenger Transport Act 1990* mandates that drivers of public passenger vehicles must be authorised. The *Passenger Transport Regulation 2007* outlines the requirements for authorisation and the categories of driver authorities which include authorities for bus drivers, taxi drivers and hire car drivers.

Legislated provisions provide the firm basis needed to deliver the high level of compliance with driver authorisation requirements the community expects. Importantly, where drivers

do not comply with the requirements, Transport for NSW may take action to amend, suspend or cancel authorisations.

The Passenger Transport Act and Regulation could be amended to require authorisation of community transport drivers, to specify authorisation requirements and any restrictions on its application. This is arguably the best approach for ensuring compliance across the community transport sector and would also provide the basis for taking action against non-compliant drivers. It is envisaged that arrangements for monitoring compliance would be similar to those currently in place for other driver authorities including investigating complaints, regular on road inspections, and regular and ad hoc joint inspections with police.

There are alternatives to introducing driver authorisation in legislation and these are discussed below.

It is important to note that a driver authority specific to community transport would not entitle a driver to also drive a public passenger vehicle.

4.5.2 Amend Funding Agreement to require Driver Authorisation

This option would involve amending the funding agreement between Transport for NSW and community transport organisations to require all drivers to be authorised and to specify the requirements of authorisation. Under this option authorisation is not mandated in legislation. However, the funding agreement has the force of a contract and failure to comply would trigger provisions in the contract relating to non-compliance/breaches of the agreement. It is envisaged that under this option, contract compliance would be monitored by introducing an auditing and reporting framework.

Reforms agreed to by the Council of Australian Governments (COAG) in 2010 mean that in future community transport organisations may receive funding from other Departments, not Transport for NSW. In these circumstances, requirements relating to driver authorisation as proposed in this approach could be incorporated in the agreement between the funding Department and the community transport organisation.

Question

8. Which approach best suits your organisation and why?

5 DRIVER AUTHORISATION FRAMEWORK OPTIONS

Drawing on these framework elements and the preceding discussion a number of driver authorisation framework options have been developed. Their key features are summarised in table 1 and explained in more detail below.

Table 1

Option	Driver requirements		All drivers	Basis of driver requirements		Additional monitoring
	Existing (Funding Agreement Schedule J)	Strengthened medical requirements		Funding agreement	Legislation	
1	✓		✓	✓		
2	✓		✓	✓		✓
3	✓	✓	✓	✓		✓
4	✓		✓		✓	✓
5	✓	✓	✓		✓	✓

Note: all options allow community transport operators to employ drivers who hold any other type of authorisation issued by Transport for NSW.

Option 1

No change to the current requirements for community transport drivers

The current requirements would be maintained for operators to ensure Transport for NSW that they will not use a driver unless the operator is satisfied that the person:

- is proper, having regard to any criminal convictions;
- is competent, having regard to any driving offences committed; and
- has a current (i.e. not cancelled, suspended or expired) driver licence appropriate for the vehicle in question.

Under this option there would be no additional criminal or driving record checks or medical assessments.

Option 2

In addition to the approach proposed in Option 1, this option would involve Transport for NSW monitoring compliance with the driver requirements of the funding agreement

Option 3

Introduce strengthened medical requirements for community transport drivers through amendment to the funding agreement.

In addition to the existing requirements, the funding agreement would be amended to include strengthened requirements for medical assessment of applicants so that under this option drivers would need to:

- be proper with regard to criminal history;
- Have a satisfactory driving record;
- Hold a current licence; and
- May be subject to a medical assessment. As is the case in Queensland, applicants would need to meet all key medical criteria contained in an application form. Applicants would only need to undergo medical assessment where they did not meet all these criteria.

Community transport operators would need to provide evidence to Transport for NSW that their drivers satisfactorily meet the above criteria. The provision of funding would be dependent on the Director General being satisfied that the operator has provided sufficient evidence.

Option 4

Introduce legislative amendments to require community transport drivers to be authorised according to current requirements.

Legislation would be introduced to:

- Require all community transport drivers to be authorised;
- Establish separate authorisation for community transport drivers;
- Adopt existing requirements as they apply to community transport drivers as basis for community transport driver authorisation – ie Drivers:
 - Are proper with regard to criminal history;
 - Have a satisfactory driving record; and
 - Hold a current licence.
- No additional requirements such as medical assessments would be introduced.
- Applications would be managed by the community transport operator.
- Transport for NSW would process applications including conducting criminal and driving record checks.
- Arrangements for monitoring compliance would be similar to those currently in place for other driver authorities including investigating complaints, regular on road inspections, and regular and ad hoc joint inspections with police.

Option 5

Introduce legislative amendments to require community transport drivers to be authorised, with authorisation to introduce strengthened medical requirements.

Legislation would be introduced to:

- Require all community transport drivers to be authorised;
- Establish separate authorisation for community transport drivers;

- Adopt existing requirements plus strengthened medical assessment and first aid training requirements as the basis for community transport driver authorisation - ie Drivers:
 - Are proper with regard to criminal history;
 - Have a satisfactory driving record;
 - Hold a current licence; and
 - May be subject to a medical assessment.
- As is the case in Queensland, applicants would need to meet all key medical criteria contained in an application form. Applicants would only need to undergo medical assessment where they did not meet all these criteria.
- Applications would be managed by the community transport operator.
- Transport for NSW would process applications including conducting criminal and driving record checks.
- Arrangements for monitoring compliance would be similar to those currently in place for other driver authorities including investigating complaints, regular on road inspections, and regular and ad hoc joint inspections with police.

Note in each option, community transport driver authorisation would limit the holder to only driving for community transport organisations. Holders would not be authorised to drive a public passenger service vehicle.

Question

9. Please indicate which approach best suits you as a community transport operator and why?