<table>
<thead>
<tr>
<th>Topic</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>EXECUTIVE SUMMARY</td>
<td>03</td>
</tr>
<tr>
<td>01. POLICY</td>
<td>10</td>
</tr>
<tr>
<td>02. LEGISLATION</td>
<td>18</td>
</tr>
<tr>
<td>03. ADMINISTRATION</td>
<td>22</td>
</tr>
<tr>
<td>04. AUDIT MANAGEMENT</td>
<td>24</td>
</tr>
<tr>
<td>05. OUT-OF-SCOPE RECOMMENDATIONS</td>
<td>33</td>
</tr>
<tr>
<td>APPENDICIES</td>
<td>37</td>
</tr>
</tbody>
</table>
Heavy Vehicle Accreditation Operational Review

The WAHVA scheme aims to improve road safety while maintaining productivity, standardising operating practices and improving community confidence in the industry.

**HEAVY VEHICLE ACCREDITATION IN WESTERN AUSTRALIA**

Since 2002, operators of certain types of heavy vehicles have require accreditation to gain a permit or order from Main Roads WA. The WAHVA scheme is mandatory for individuals and organisations that require a permit or order to perform any transport task as part of a commercial business or for profit within Western Australia, including interstate operators.

The objectives of the WAHVA scheme are to:
1. Improve road safety.
2. Increase the productivity of the transport industry through adoption of good management by responsible operators.
3. Provide management and operating standards for the transport industry.
4. Improve community confidence in the operation of heavy vehicles on State roads.
5. Satisfy the Commissioner of Main Roads the individual/entity has systems in place required under the Road Traffic (Vehicles) Regulations 2014 to be accredited in the scheme so an application may be made to operate under a modified mass, dimension or access requirement.

The intent of the WAHVA scheme is to provide equitable treatment of all operators and to enable heavy vehicle operators to demonstrate, through an audit of their management systems, that their vehicle/s and driver/s comply with regulatory standards. The scheme is, in effect, an “operator licence”. The WAHVA scheme involves three mandatory modules which operators are required to incorporate into their daily work practices:

- Maintenance Management.
- Fatigue Management.
- Dimension and Loading.

There is also one optional module which is required to be undertaken only if an operator wishes to operate within the Accredited Mass Management Scheme (AMMS):

- Mass Management

Accreditation does not exempt operators from complying with other requirements of the Road Traffic (Vehicles) Act 2012.

The National Heavy Vehicle Regulator (NHVR) manages the National Heavy Vehicle Accreditation Scheme (NHVAS) as a voluntary process of “recognising operators who have robust safety and other management systems in place”. While much of the content in the NHVAS is similar, the mandatory application of the WAHVA scheme to heavy vehicles over 42.5 tonnes creates a significant difference in the application and compliance practices undertaken by the respective managers of the schemes and the operators. In effect, the WAHVA scheme provides a minimum standard that must be met by operators in Western Australia.
STRATEGIC AND OPERATIONAL REVIEW OF THE WA HEAVY VEHICLE ACCREDITATION SCHEME

Main Roads WA announced a review of the WAHVA scheme to ascertain its ongoing effectiveness and to analyse to what extent, if any, changes were required to improve the scheme. Incremental changes have been made to the scheme over time, however, it has not been comprehensively reviewed since its inception.

The project has been conducted in two stages:

- Strategic Review – a review of the existing high level directives, goals and objectives to underpin, realign or redevelop the strategic direction, objectives and outcomes of WAHVA.
- Operational Review – a review to ensure that operational matters, policies, processes and legislation allow for WAHVA to meet its strategic objectives and outcomes as identified through the Strategic Review.

The primary objective of this project was to operationalise the recommendations from the Strategic Review:

a. Affirm ‘safety’ as the primary strategic objective for the scheme.
b. Retain the current threshold for the scheme to apply to heavy vehicles over 42.5 tonnes.
c. Develop Key Performance Indicators (KPIs) to allow for the assessment of the scheme’s performance against each of the strategic objectives.
d. Investigate the ability to enhance data sharing agreements between public sector agencies.
e. Enhance the digital presence of the scheme through Main Roads WA’s website.
f. Conduct an end-to-end process review for accreditation and permitting.
g. Identify processes to be reviewed for potential application of electronic workflow, interface with mobile applications and process automation.
h. Pursue options for ‘risk trading’ with operators seeking to reduce manually-intensive workflow.
i. Create processes and communication templates to generate educational examples for the scheme’s participants.
j. Incorporate incentives for the scheme’s participants.
k. Develop a risk-based audit methodology.
l. Improve the audit regime through targeted quality improvements.
m. Link accreditation status to enforcement and instances of non-conformance.
n. Develop an accreditation scale for operators focussed on continuous improvement.
o. Publish the performance of the scheme in the public domain.

The fifteen existing recommendations from the Strategic Review formed the scope of the Operational Review.
Heavy Vehicle Accreditation Operational Review

The Operational Review was undertaken with a focus on four primary areas:

**OPERATIONAL REVIEW OF THE WA HEAVY VEHICLE ACCREDITATION SCHEME**

The purpose of the Operational Review was to assess the scheme's ongoing effectiveness, and analyse to what extent, if any, changes are required to expand or improve the scheme to ensure that the recommendations outlined in the WAHVA Strategic Review are implemented. During the Operational Review we have reviewed the operational practices of operators and auditors to ascertain what changes need to be made.

During the Operational Review we have assessed four areas to ensure that the recommendations of the Strategic Review have been addressed:

01 | **Policy** - WAHVA modules, business rules, guides, and other operational policies.
02 | **Legislation** - roles and responsibilities of Main Roads, the Department of Transport and Worksafe, Main Roads to administer the WAHVA scheme.
03 | **Administration** - “Gap Analysis” to review the management and delivery of WAHVA, including accreditation processes and current technology used by Main Roads.
04 | **Audit Management** - the WAHVA audit regime review, including systems audit, entry, re-entry, compliance, random, and triggered audit types.

In addition, the key themes of innovation, reform and digitisation were also explored during the phases of Research and Consultation, making use of Deloitte's Subject Matter Experts in these competencies.

The Operational Review considers the nature of the Western Australian heavy vehicle industry. The Operational Review provides recommendations that allow for flexibility in the WAHVA scheme to ensure that the same opportunities, outcomes and potential benefits are available to all operators. Extensive consultation was undertaken to support the analysis and development of recommendations:

- Analysis of internal WAHVA documents and data including modules, business rules, operational guide, business plans, statistics, process maps and the Accreditation web pages.
- Over 27 face-to-face sessions with more than 50 stakeholders in order to get their feedback as the clients and internal users of the WAHVA scheme.
- 3 surveys to operators, auditors and transport inspectors, generating 242 responses.
- Facilitation of a workshop with 37 attendees to discuss and verify issues and draft recommendations.

The WAHVA scheme has not been substantively reviewed by an independent entity since its inception. While improvements and changes have been made internally and communicated to the relevant stakeholders, it is generally accepted that the processes and use of technology to undertake these processes has not kept pace with related trends over this time. As such the underlying processes and technology used by Main Roads requires a substantial refreshment (including financial investment) to ensure that the use of online and digital channels is maximised, the use of State Government resources is efficiently deployed to manage the scheme and auditor independence is maintained.

The WAHVA scheme modules and their content are broadly aligned to the NHVAs. The modules attempt to demonstrate a link to the WAHVA scheme's strategic objectives. Over time, a series of changes have resulted in duplication, resulting in frustration voiced by operators attempting to comply. A number of recommendations in the Operational Review have been developed to reduce this duplication and attempt to more clearly communicate future changes.
Heavy Vehicle Accreditation Operational Review

The review process consisted of several phases to gather input from a broad range of stakeholders and identify key themes that required improvement

<table>
<thead>
<tr>
<th>Operational Review components</th>
<th>Activities</th>
<th>Key Outcomes</th>
</tr>
</thead>
</table>
| RESEARCH                      | • Provision of initial data request (standards, modules, business plan, etc.)  
                                 • Engagement with subject-matter experts to determine industry trends and comparisons with other jurisdictions  
                                 • Review of legislation based on publicly-available information and discussion with subject-matter experts  
                                 • Identification of roles and responsibilities across relevant Government agencies  
                                 • Review of current accreditation processes  
                                 • Identification of technology and systems deployed for the management of accreditation  
                                 • Identification of stakeholders to be consulted and development of preliminary questions | • Core processes, technology/systems and responsibilities (incl. legislative) defined  
                                 • Confirmed list of stakeholders and interview questions  
                                 • Identification of key industry trends and initial jurisdictional comparisons |
| CONSULTATION                  | • Consultation with the Main Roads project team  
                                 • Interviews with HVS (Heavy Vehicle Services) accreditation and permit teams  
                                 • Provision of secondary data request (business processes, etc.), based on preliminary consultation  
                                 • Interviews with a broad range of stakeholders (operators, auditors etc)  
                                 • Survey with questions based on the one-on-one sessions feedback development and launch | • Refined responses from the stakeholder survey  
                                 • Collation of issues and suggested improvements  
                                 • Data and information request complete |
| STAKEHOLDER WORKSHOP         | • Workshop preparation and facilitation  
                                 • Document key themes and outstanding issues arising from workshop | • Workshop agenda and presentation material  
                                 • Workshop outcomes |
| DRAFT REPORT                  | • Finalisation of issues and preliminary recommendations register  
                                 • Drafting of final report | • High-level report structure  
                                 • Listing of preliminary recommendations  
                                 • Draft report |
| FINAL REPORT                  | • Verification of draft report and preliminary list of recommendations  
                                 • Completion of final report | • Final report |
A number of key issues were discussed in detail during the stakeholder workshop, which provided further confirmation of the proposed recommendations.

A sample of the issues discussed at the stakeholder workshop are listed below. These issues and associated commentary was assessed against other stakeholder feedback to develop the recommendations.

**DATA SHARING ACROSS GOVERNMENT AGENCIES**

- What duplicated information do you currently provide to State Government agencies?
- What information would you be comfortable to share across State Government agencies?
- Is there any information that you would not want shared across State Government agencies?

- Duplication of vehicle licensing and medical certification requirements, with minor differences creating a need for unnecessary duplication
- State Government and Local Government requirements often overlap
- Information that could be shared includes non-compliance notices/status, approved permits and verified safety statistics
- Operators to retain ability to determine what data in commercial in confidence.

**ENHANCING THE DESIGN OF WAHVA MODULES**

- Where can repetition in the WAHVA modules be reduced?
- How can 'fitness for work' be enhanced in the WAHVA modules?
- Are there other changes that can be made to WAHVA modules, business rules and Operator's guide?

- General acceptance that components of the modules can be consolidated, to avoid unnecessary repetition
- Investigate the ability to incorporate Mass Management into the Loading and Dimension module
- Data from ITS, telematics systems and wearables could be used to monitor fitness-for-work
- Future incremental changes to the WAHVA scheme still require consultation
- Examine a broadened application of the WAHVA scheme

**WAHVA SCHEME AUDIT REGIME**

- How can the independence of auditors be maintained and strengthened?
- What requirements for audits under the WAHVA scheme are unclear?
- What criteria could be used to develop a risk-based audit methodology?

- Auditor rotation enforced or auditors appointed by Main Roads
- Prevent the delivery of auditing and consulting services by the same party to the same operator
- Chain-of-responsibility requirements are not clearly understood or seen to proceed ‘down the chain’
- Operators guide contains out-of-date information
- AMMS audit activities require specialisation
- Risk thresholds should reflect infringement history, new/broadened operations, telematics data, documented procedures and presence of quality management systems

**RISK TRADING**

- What incentives could be used to encourage compliance and continuous improvement?
- What changes should be made to penalties under the WAHVA scheme?
- How could accreditation scales be determined under the WAHVA scheme?

- Incentives for operators with a sound history of compliance include the removal of roadside checks, self assessments and a reduction in audit frequency
- Penalties need to be more severe including fines, suspension of accreditation, more frequent audit and the loss of self-inspection rights
- Risk thresholds can be determined based on competence of company/employees, audit history, operations with dangerous goods and vehicle size
WA Heavy Vehicle Accreditation Operational Review

Recommendations from across the four primary areas have been identified for further consideration and implementation. The development of change management plans for individual initiatives are to be developed to manage the needs of stakeholders.

<table>
<thead>
<tr>
<th>TERMS OF REFERENCE</th>
<th>CONSOLIDATED RECOMMENDATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>POLICY REVIEW</td>
<td>1. Consolidate modules, rules and guides</td>
</tr>
<tr>
<td></td>
<td>2. Review the roadworthiness form and process</td>
</tr>
<tr>
<td></td>
<td>3. Reduce use of paper-based documents</td>
</tr>
<tr>
<td></td>
<td>4. Establish regular training forums to provide guidance to operators</td>
</tr>
<tr>
<td></td>
<td>5. Develop and implement metrics that will evaluate the effectiveness of the WAHVA scheme</td>
</tr>
<tr>
<td></td>
<td>6. Develop and implement categories for Operators</td>
</tr>
<tr>
<td></td>
<td>7. Develop and implement risk levels and incentives for Operators</td>
</tr>
<tr>
<td>Refer to pages 8 - 15</td>
<td></td>
</tr>
<tr>
<td>LEGISLATION REVIEW</td>
<td>8. Optimize data sharing process between Transport agencies</td>
</tr>
<tr>
<td></td>
<td>9. Review roles and responsibilities between other State Government agencies</td>
</tr>
<tr>
<td></td>
<td>10. Maintain current WAHVA requirements in response to any national policy changes</td>
</tr>
<tr>
<td></td>
<td>11. Review and communicate the standard medical permission form</td>
</tr>
<tr>
<td></td>
<td>12. Update references in the WAHVA scheme documentation</td>
</tr>
<tr>
<td>Refer to page 16 - 19</td>
<td></td>
</tr>
<tr>
<td>ADMINISTRATION REVIEW</td>
<td>13. Develop and promote electronic workflow for accreditation</td>
</tr>
<tr>
<td></td>
<td>14. Review and restructure online WAHVA content</td>
</tr>
<tr>
<td></td>
<td>15. Optimize and automate reporting systems</td>
</tr>
<tr>
<td></td>
<td>16. Develop and implement internal and external communication plans</td>
</tr>
<tr>
<td></td>
<td>17. Develop and implement a stakeholder service standard</td>
</tr>
<tr>
<td></td>
<td>18. Review the incidents investigation process and link to accreditation status</td>
</tr>
<tr>
<td>Refer to page 20 - 25</td>
<td></td>
</tr>
<tr>
<td>AUDIT MANAGEMENT</td>
<td>19. Implement a risk-based audit methodology.</td>
</tr>
<tr>
<td></td>
<td>20. Develop a mandatory policy for auditor independence</td>
</tr>
<tr>
<td></td>
<td>21. Optimize quality standards for auditors</td>
</tr>
<tr>
<td></td>
<td>22. Establish standardised audit reporting requirements</td>
</tr>
<tr>
<td></td>
<td>23. Optimize and automate audit report</td>
</tr>
<tr>
<td></td>
<td>24. Investigate establishment of an audit panel to be managed by Main Roads</td>
</tr>
<tr>
<td>Refer to page 26 - 34</td>
<td></td>
</tr>
</tbody>
</table>

© 2019 Deloitte Consulting Pty Ltd
High level implementation roadmap

The proposed implementation plan consists of three sequential waves to realise improvements in the WAHVA scheme, recognising the longer timeframes for legislative changes.

1. **1st Wave (2019)**
   - Consolidate modules, rules and guides
   - Review the roadworthiness form and process
   - Implement metrics and KPIs
   - Update legislation links in the WAHVA scheme documents
   - Develop and implement internal and external communication plans
   - Review and restructure HVS landing page
   - Develop a mandatory policy for auditor independence
   - Establish standardised audit reporting requirements

2. **2nd Wave (2020-2021)**
   - Reduce use of paper-based documents
   - Develop and implement operators categories
   - Optimise data sharing process between agencies
   - Develop and implement online functionality for accreditation applications
   - Optimise and automate reporting system
   - Implement risk-based audit approach
   - Optimize quality standards

3. **3rd Wave (2022-2023)**
   - Establish regular training forums
   - Develop and implement risk levels and incentives for operators
   - Review roles and responsibilities between agencies
   - Review and develop single medical permission form
   - Develop and implement operators categories
   - Investigate opportunity for the WAHVA scheme being accepted on national level
   - Develop and implement risk levels and incentives for operators
   - Review the incidents investigation process
   - Investigate ability to reduce costs associated with travel
   - Establish standardised audit reporting requirements

01

POLICY
01 | Policy

Policy recommendations are focussed on reducing duplicated activity for operators, promoting electronic workflow and recognising risk-trading as a mechanism for process improvement.

Policy recommendations from the Strategic Review:

1. Affirm ‘safety’ as the primary strategic objective for the scheme.
2. Develop Key Performance Indicators (KPIs) to allow for the assessment of the scheme’s performance against each of the strategic objectives.
3. Enhance the digital presence of the scheme through Main Roads WA’s website.
4. Identify processes to be reviewed for potential application of electronic workflow, interface with mobile applications and process automation.
5. Pursue options for ‘risk trading’ with operators seeking to reduce manually-intensive workflow.
6. Create processes and communication templates to generate educational examples for the scheme’s participants.

RECOMMENDATIONS

<table>
<thead>
<tr>
<th>1</th>
<th>Consolidate modules, rules and guides</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Update the roadworthiness process</td>
</tr>
<tr>
<td>3</td>
<td>Reduce use of paper-based documentation</td>
</tr>
<tr>
<td>4</td>
<td>Establish regular training forums for operators</td>
</tr>
</tbody>
</table>

- Consolidate common elements of all existing modules, business rules and the operators guide into one primary module. Expand key terms and definitions section. Use smaller modules to provide the remaining accreditation requirements.
- Link Mass module with the AMMS permit process and develop internal training to increase comprehension and consistent guidance provided by Main Roads.
- Consider the combination of the Mass module with the Loading and Dimension module, given the overlapping components.
- Reduce instances of interpretative or subjective language. Provide clear definitions for "major" and "minor" terms (e.g. “Must include written instructions that explain how to find a major or serious fault”).
- Exclude duplicated requirements across modules and update links and references to other documentation.
- Investigate the feasibility of continuing the subcontractor arrangements to identify which drivers and vehicles are operating under the WAHVA scheme.
- Roadworthiness checks should be undertaken by a third party (i.e. qualified mechanic) and be considered as an incentive for operators that meet stringent performance and compliance criteria. In the longer-term, roadworthiness should only be checked by certified third parties.
- Review the roadworthiness checklist and consider the feasibility to a) cover multiple vehicles, and b) move checklist into an online customer portal.

- Review existing paper forms Main Roads required from operators. Identify more streamlined documentation requirements based on any changes from modules.
- Identify potential electronic workflow and process automation that could be undertaken.
- Define acceptable electronic data sources and deem these to be equivalent to like-for-like paper-based documentation.

- Develop and establish regular training forums (e.g. online, face-to-face workshops) to provide guidance specifically to Operators. Include specific examples to assist the compliant completion of electronic and paper-based forms.
01 | Policy

Policy recommendations are focussed on reducing duplicated activity for Operators, promoting electronic workflow and recognising risk-trading as a mechanism for process improvement.

Policy recommendations from the Strategic Review:

1. Affirm ‘safety’ as the primary strategic objective for the scheme.
2. Develop Key Performance Indicators (KPIs) to allow for the assessment of the scheme’s performance against each of the strategic objectives.
3. Enhance the digital presence of the scheme through Main Roads WA’s website.
4. Identify processes to be reviewed for potential application of electronic workflow, interface with mobile applications and process automation.
5. Pursue options for ‘risk trading’ with operators seeking to reduce manually-intensive workflow.
6. Create processes and communication templates to generate educational examples for the scheme’s participants.

RECOMMENDATIONS

5. Develop and implement metrics that will evaluate the effectiveness of the WAHVA scheme

- Develop and implement KPIs that will measure the effectiveness of the WAHVA scheme.
- Develop and implement a performance management system, based on the data produced for the KPIs.
- Publish statistics publicly, relating to the agreed KPIs.

6. Develop and implement categories for operators

- Develop definitions for different categories of Operators (e.g. small-medium-large) based on the distances driven and seasonality of operations.
- Incorporate definitions for categories in the general module and apply different requirements to an operator based on the relevant category.

7. Develop risk levels of accreditation for operators

- Develop levels of accreditation for operators (for example, A1 - A2 – A3, Gold – Silver – Bronze).
- Develop and implement incentives for operators in line with their risk level. Incentives for consideration could include the reduction in frequency of audits, provision of data in place of systems/paperwork.
Policy recommendations are based on current state analysis and stakeholder feedback

1. **Consolidate modules, rules and guides**
   - The WAHVA modules contain duplicated information that creates confusion.
     - Modules and business rules contain duplicated information that can be unified and standardised, such as training and education, documentation records, responsibilities and internal review.
     - The operators guide contains sample forms that are duplicated with check-lists in the modules.
     - The language of the documentation contains too many subjective terms that generate varied interpretation by operators and auditors.

2. **Update the roadworthiness process**
   - The current checks in place for roadworthiness are not sufficiently thorough.
     - The roadworthiness form and associated records does not indicate the physical condition of the vehicle. The current form is viewed as a ‘tick the box’ exercise to pass the WAHVA scheme audit.
     - Roadworthiness should be checked by an approved third party mechanic and occur as an independent review.
     - Roadworthiness could be checked by a person who has had at least 5 years experience in heavy vehicle maintenance, potentially including as a driver.
     - Roadworthiness checklist forms have to be created / duplicated for each vehicle which creates additional paperwork.

3. **Reduce use of paper-based documentation**
   - The volume of paper documentation has become a burden for all stakeholders.
     - Operators have to complete an excessive number of paper-based forms to be able to obtain accreditation and pass an audit.
     - Operators view the scheme as overly-bureaucratic and not impacting safety outcomes. Any prior changes to the WAHVA scheme have been viewed as creating more paperwork.
     - Electronic data sources have been viewed as requiring paper-based duplicates – resulting in increased paper-based workflow for both industry and the government.

4. **Establish regular training forums for operators**
   - The WAHVA scheme has become complex and more training is required.
     - Due to the complexity of the standards and a perceived lack of communication, operators do not consistently understand WAHVA process changes and how to complete the forms correctly.
     - Smaller operators face a larger burden due to the time commitment required.
     - Automation would be welcomed, provided that any resulting process changes are clearly and broadly communicated.
     - The interactive components of industry training is essential to allow operators to ask questions and be able to provide feedback to the upcoming changes.

*Stakeholder feedback is listed as an example of the opinions drawn from consultation. This feedback has been considered against other data and information provided from other stakeholders, Main Roads and publicly available sources to develop recommendations.*
## 01 | Policy

Policy recommendations are based on the current state review and stakeholders feedback on the modules, business rules and Operator’s guide.

### RECOMMENDATIONS

<table>
<thead>
<tr>
<th>5</th>
<th>Develop and implement metrics that will evaluate the effectiveness of the WAHVA scheme</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Current state</strong></td>
<td></td>
</tr>
<tr>
<td><strong>KPIs and related metrics are not regularly and publicly reported.</strong></td>
<td></td>
</tr>
<tr>
<td>• There is a lack of regularly reported KPIs that report on the scheme’s effectiveness.</td>
<td></td>
</tr>
<tr>
<td>• Operators commonly view the WAHVA scheme as a bureaucratic burden, not as a mechanism to improve safety – they do not see measurable results of the scheme.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>6</th>
<th>Develop and implement categories for operators</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>The breadth of operations undertaken using the WAHVA scheme is becoming more diverse.</strong></td>
<td></td>
</tr>
<tr>
<td>• A mandatory, one-size WAHVA scheme does not allow for equity, particularly for smaller Operators. For example, seasonal drivers are not able to execute daily checks of their vehicles.</td>
<td></td>
</tr>
<tr>
<td>• Depending on the operator category (for example, small-medium-major) operators should comply with different standards and have differing audit procedures.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>7</th>
<th>Develop and implement risk levels and incentives for operators</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Operators are not incentivised for continued compliance and good performance.</strong></td>
<td></td>
</tr>
<tr>
<td>• The WAHVA scheme works as a reactive tool instead of a proactive incentive that will change compliance and behaviour. Incentives are not provided through the WAHVA scheme to recognise positive performance.</td>
<td></td>
</tr>
<tr>
<td>• Operators do not see recognition from Main Roads of sustained good practice, technology improvements and other safety initiatives. There is no difference between good and exceptional operators and any additional investments in safety are not encouraged.</td>
<td></td>
</tr>
</tbody>
</table>

### Stakeholder feedback *

*While the process has merit, the examples listed by Main Roads on their website are poor and do not use a systems approach. Hence, many operators (and auditors) do not understand the desired effects of the system*

“All Accredited operators are treated the same and the scheme doesn’t fit for everyone”

“operators who do minimal kms per year shouldn’t need to be audited as often as the long haul commercial truck mobs, for example primary producers. The one rule fits all is an over kill”

“For me with one truck doing 15000 km a year the compliance is too rigorous”

“Incentive based improvements. For example operators who maintain good up-to-date equipment could get audited less frequently or be given access to larger combinations on permitted routes e.g. triples on Brand Highway”

“If technology is used in the scheme, there could be an incentive to put this technology into vehicles...”

“Those not complying are not being prosecuted, there is no incentive to comply in WA”

* Stakeholder feedback is listed as an example of the opinions drawn from consultation. This feedback has been considered against other data and information provided from other stakeholders, Main Roads and publicly available sources to develop recommendations.
01 | Policy

KPIs and the metrics that are used for calculation can be aligned to the value drivers or the organisation.

The combination of Main Roads’s value drivers and a detailed understanding of core WAHVA process and available data can be used to generate a comprehensive top-down and bottom-up view of the necessary KPIs.
A structured process is recommended to develop KPIs that will measure the effectiveness of the WAHVA scheme.

1. Metrics
   - Set the metrics that will determine the effectiveness of the WAHVA scheme, for example:
     1. **Decrease of x% incident rates involving heavy vehicles**
     2. **% of operators issued with non-compliance notices**
     3. **% of high-risk operators (dependant on risk-based assessment / methodology)**
     4. **% of non-conforming audits following assessment by Main Roads**
     5. **% of returned audit results following assessment by Main Roads**
     6. **Accreditation process cycle time (application-to-approval/rejection)**

2. Infrastructure
   - Develop data definitions for each metric including:
     - Metric description
     - Calculation formula
     - Data source(s)
     - Unit(s) of measurement
     - Functional responsibility (if needed)
     - Priority/significance of metric (optional)
   - Nominate a standard location for the calculation and reporting of metrics
   - Establish regular meeting cadence to review metrics

3. Data
   - Identify data sources based on nominated metrics, for example:
     - Number of incidents/accidents every year
     - Number of non-compliance notices
     - Number of operators accredited
     - Number of high-risk and low-risk operators
     - Number of audits per year and number of non-conforming audits within
     - Number of audits filled incorrectly due to auditors' errors
     - Number of returns of audits to operators/auditors per year
     - Accreditation process average lead time

4. Pilot
   - Commence a pilot initiative for metrics:
     - Gather the data and test the calculations based on the data definitions
     - Gather feedback from selected internal users
     - Incorporate improvements

5. Control
   - Update metrics list and data definitions (if needed)

6. KPIs
   - Publish metrics as KPIs that measure the effectiveness of the WAHVA scheme:
     1. **Add weighting to each metric**
     2. **Assign management responses for metrics/KPIs for functions within Main Roads (or other agencies)**
     3. **Develop dashboard to review and analyse metrics/KPIs progress**
     4. **Review KPIs on a regular basis**
01 | Policy

Incentives and the consideration of accreditation levels can act as a mechanism to encourage compliance and continuous improvement.

**EXAMPLE**

<table>
<thead>
<tr>
<th>LEVELS OF ACCREDITATION AND POTENTIAL CHARACTERISTICS</th>
<th>POTENTIAL INCENTIVES</th>
</tr>
</thead>
<tbody>
<tr>
<td>A1 / Gold</td>
<td>Reduced cost of accreditation</td>
</tr>
<tr>
<td>Long-term compliance</td>
<td>Reduced cost of insurance</td>
</tr>
<tr>
<td>No tickets or penalties recorded</td>
<td>Less frequent audits</td>
</tr>
<tr>
<td>No incidents / accidents recorded</td>
<td>Selected permits availability</td>
</tr>
<tr>
<td>Average age of fleet &lt; 5 years</td>
<td>Longer accreditation period</td>
</tr>
<tr>
<td>Records automated and available in the approved systems</td>
<td>Self-inspection rights</td>
</tr>
<tr>
<td>Telematics / e-dairies / PBS system implemented</td>
<td></td>
</tr>
<tr>
<td>Fitness for work / drivers alcohol and drug automated testing</td>
<td></td>
</tr>
<tr>
<td>Roadworthiness certificate signed by an independent approved mechanics</td>
<td></td>
</tr>
<tr>
<td>Low risk in the risk-based audit system</td>
<td></td>
</tr>
</tbody>
</table>

| A2 / Silver                                            | Reduced cost of accreditation |
|--------------------------------------------------------| Simplified audit process     |
| Less than 5 cases of non-compliance per year*          | Selected permits availability|
| Tickets or penalties recorded < 3 per year             | Self-inspection rights      |
| No incidents / accidents recorded                      |                     |
| Average age of fleet < 10 years                        |                     |
| Records automated and available in the systems         |                     |
| Roadworthiness certificate signed by an independent approved mechanics or by a mechanic with more than 5 years of experience |     |
| Low risk in the risk-based audit system                |                     |

| A3 / Bronze                                            | Reduced cost of accreditation |
|--------------------------------------------------------| Selected permits availability |
| Tickets or penalties recorded < 10 per year            | Self-inspection rights      |
| No incidents / accidents recorded < 10 per year        |                     |
| Roadworthiness certificate signed by a mechanic with more than 5 years of experience |                      |
| Paper-based records                                   |                     |
| Moderate risk in the risk-based audit system           |                     |
## Legislation

Legislation recommendations are focused on improved data sharing and standardised requirements between Government agencies.

**RECOMMENDATIONS**

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>8</td>
<td><strong>Optimise data sharing process between Transport agencies</strong></td>
</tr>
<tr>
<td>9</td>
<td><strong>Review roles and responsibilities between other State Government agencies</strong></td>
</tr>
<tr>
<td>10</td>
<td><strong>Maintain current WAHVA requirements in response to any national policy changes</strong></td>
</tr>
<tr>
<td>11</td>
<td><strong>Review and communicate the standard medical permission form</strong></td>
</tr>
<tr>
<td>12</td>
<td><strong>Update references in the WAHVA scheme documentation</strong></td>
</tr>
</tbody>
</table>

Legislation recommendations from the Strategic Review:

1. Affirm ‘safety’ as the primary strategic objective for the scheme.
2. Investigate the ability to enhance data sharing agreements between public sector agencies.
3. Identify processes to be reviewed for potential application of electronic workflow, interface with mobile applications and process automation.
4. Utilise departmental working groups to allow for Main Roads to have greater access to data sources captured by other agencies within the Transport portfolio.
5. Investigate ability to create and access online database(s) and/or share data between agencies within the Transport portfolio.
6. Review the roles and responsibilities of other agencies within the WA public sector (e.g. WorkSafe, WAPOL).
7. Investigate the introduction of significant penalties for the failure to become/remain accredited and being in breach of the Road Traffic Act.
8. Identify key datasets that could be shared/optimised.
9. Investigate the legislative requirement to allow Main Roads to conduct roadside testing and enforce fatigue requirements.
10. Investigate the linkage of driver medical assessments to driver licensing requirements.
11. Ensure reciprocity of the requirements under the WAHVA scheme, through any reforms or policy changes by the NHVR.
12. Seek opportunities to align with NHVR, while ensuring operators in Western Australia are not unfairly disadvantaged and the perception of red-tape is minimised.
13. Strengthen working relationships with NHVR to assist with the harmonisation of relevant accreditation requirements.
14. Review and communicate the standard medical permission form with GPs.
15. Link the status of medical assessments to drivers license. Standardise visibility of medical assessment from different agencies (e.g. Department of Transport).
17. Update references to legislation in all of the documents and standards. For example, Fatigue Management and Maintenance Management Modules refer to the repealed Road Traffic (Vehicle standards) Regulations 2002.
## Legislation

Legislation recommendations are based on current state analysis and stakeholder feedback

<table>
<thead>
<tr>
<th>RECOMMENDATIONS</th>
<th>Current state</th>
<th>Stakeholder feedback *</th>
</tr>
</thead>
</table>
| **8** Optimise data sharing process between Transport agencies | Data is not adequately shared between State Government agencies.  
- Data between Transport agencies is not seamlessly connected. Information required by different agencies can be duplicated (e.g. medical permission forms).  
- There is no way to check medical accreditation status unless Operators or drivers report this to Main Roads. | “Info provided to one agency does not automatically share to another”  
“Share non-compliance info between Worksafe + Main Roads” |
| **9** Review roles and responsibilities between other State Government agencies | Gaps in WAHVA scheme responsibilities prevent the use of resources being maximised  
- Worksafe is responsible for the checking of records for fatigue management, however Worksafe does not currently have the power to stop the vehicles.  
- Worksafe can gather data of for non-compliance from road stops, call-centres and Main Roads personnel but cannot share information relating to non-compliance with other agencies including Main Roads. | “Although Fatigue is covered by another regulator, I believe this area needs to be reviewed”  
 “[Fitness for work] ...have this well covered following Worksafe’s guidelines. We would end up with 2 (different?) fitness for work schemes in one business” |
| **10** Maintain current WAHVA requirements in response to any national policy changes | Stakeholders retain concerns that schemes in other jurisdictions will diverge  
- Utilising cross-border routes with different schemes is complex. Operators have to restart fatigue recording on the border so it will be compliant with national scheme. | “Yes, make WAHVA acceptable to other States!”  
 “Is separate from the other states in Australia. Have to duplicate permits, registrations into both schemes”  
 “Please just integrate with NHVAS, the additional red tape of two schemes is counter productive” |
| **11** Review and communicate the standard medical permission form | Standard requirements are not uniform across State Government agencies  
- There are several medical permission forms drivers need to complete for different agencies and licenses (e.g. Main Roads, DoT, commercial vehicles, dangerous goods).  
- Information contained within these different medical forms is often duplicated.  
- GPs are using out-of-date medical permission forms. | What duplicated information do you currently provide to State Government agencies?  
- “DG Medical Commercial vehicle drivers, Pilot license”  
- “Medical + Fatigue, Training records”  
- “Medical to be profiled on drivers license for all” |
| **12** Update references in the WAHVA scheme documentation | Current documentation for the WAHVA scheme contains out-of-date references  
- There are references to repealed and outdated legislation in the current WAHVA scheme documents. | - There are links in the WAHVA documents (modules) that are outdated and not relevant for current different types of operators |

* Stakeholder feedback is listed as an example of the opinions drawn from consultation. This feedback has been considered against other data and information provided from other stakeholders, Main Roads and publicly available sources to develop recommendations.
Changes to existing legislation should be pursued to optimise the State Government resources available to improve safety outcomes.

Driver fatigue is currently enforced by Worksafe, however this information cannot be passed through to Main Roads. Future legislative changes should seek to provide Main Roads with the ability to conduct checks for compliance with fatigue management requirements.

### Current state

<table>
<thead>
<tr>
<th>Processes</th>
<th>Main Roads WA</th>
<th>Worksafe</th>
<th>Department of Transport</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administration</td>
<td>R / A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Compliance of occupational health and safety laws</td>
<td>R / A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Driver fatigue</td>
<td>C / I</td>
<td>R / A</td>
<td></td>
</tr>
<tr>
<td>Roadside enforcement</td>
<td>R / A</td>
<td>R / A (fatigue only)</td>
<td></td>
</tr>
<tr>
<td>Road access</td>
<td>R / A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Permits / Orders</td>
<td>R / A</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>Driver licensing</td>
<td>R / A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vehicle registration</td>
<td>R / A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vehicle standards</td>
<td>C / I</td>
<td>R / A</td>
<td></td>
</tr>
<tr>
<td>Vehicle modifications</td>
<td></td>
<td>R / A</td>
<td></td>
</tr>
</tbody>
</table>

### Future state

<table>
<thead>
<tr>
<th>Processes</th>
<th>Main Roads WA</th>
<th>Worksafe</th>
<th>Department of Transport</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administration</td>
<td>R / A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Compliance of occupational health and safety laws</td>
<td>R / A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Driver fatigue</td>
<td>R / A</td>
<td>R / A</td>
<td></td>
</tr>
<tr>
<td>Roadside enforcement</td>
<td>R / A</td>
<td>R / A (fatigue only)</td>
<td></td>
</tr>
<tr>
<td>Road access</td>
<td>R / A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Permits / Orders</td>
<td>R / A</td>
<td>C / I</td>
<td></td>
</tr>
<tr>
<td>Driver licensing</td>
<td>I</td>
<td>I</td>
<td>R / A</td>
</tr>
<tr>
<td>Vehicle registration</td>
<td>R / A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vehicle standards</td>
<td>C / I</td>
<td>R / A</td>
<td></td>
</tr>
<tr>
<td>Vehicle modifications</td>
<td></td>
<td>R / A</td>
<td></td>
</tr>
</tbody>
</table>

A – Accountable      R – Responsible      C – Consulted      I – Informed
03

ADMINISTRATION
03 | Administration

Administration recommendations are focused on electronic functionality, stakeholder communications and linking incidents with accreditation.

Administration recommendations from the Strategic Review:

1. Enhance the digital presence of the scheme through Main Roads WA’s website.
2. Conduct an end-to-end process review for accreditation and permitting.
3. Identify processes to be reviewed for potential application of electronic workflow, interface with mobile applications and process automation.
4. Create processes and communication templates to generate educational examples for the scheme’s participants.
5. Publish the performance of the scheme in the public domain.

RECOMMENDATIONS

13. Develop and promote electronic workflow for accreditation
- Develop online and mobile functionality for accreditation (portal for WAHVA accreditation applications) applications to reduce manual handling and control non-standard data entry.
- Promote the use of electronic workflow through a sustained communication campaign with operators and auditors.

14. Review and restructure online WAHVA content
- Review content on WAHVA web pages and remove duplicated and/or redundant information.
- Report agreed KPIs that measure the effectiveness of the WAHVA scheme.
- Develop and implement an annual survey to gauge perceptions of the WAHVA scheme and develop an online feedback page.

15. Optimise and automate reporting systems
- Agree use of common databases between functions/teams within HVS.
- Investigate options for automated internal reporting, based on user/stakeholder requirements.
- Introduce bi-annual reporting on agreed metrics/KPIs to broadcast the status of the WAHVA scheme.

16. Develop and implement internal and external communication plans
- Develop an internal communication plan based on the Operational Review, including the timeline of initiatives, employees responsible for implementation, and next steps.
- Develop an external communication plan for stakeholders – outlining a summary of the recommendations and next steps.
- Establish change management plans in accordance with corporate standards.

17. Develop and implement a stakeholder service standard
- Develop and implement service standard Main Roads personnel including response times for queries.
- Review common helpdesk enquiries and correspondence and consolidate results into a revised FAQ document, to be published online.

18. Review the incidents investigation process and link to accreditation status
- Review the incidents investigation process, develop and enforce practices to link incidents and non-compliance with accreditation status.
- Develop electronic forms to allow stakeholders to report on incidents of non-compliance.
- Increase the range of penalties for operators, from small penalties such as audit frequency to larger penalties such as permit restrictions or the suspension of accreditation.
Administration recommendations are based on current state analysis and stakeholder feedback.

**RECOMMENDATIONS**

13. Develop and promote electronic workflow for accreditation

- The WAHVA scheme is not utilising commonly available technology to aid processing.
  - The accreditation process is viewed as paper-based. Usually operators send request for accreditation via e-mail or call. Operators have expressed a preference for using online application processes.
  - Larger operators already retain the majority of their WAHVA documentation in electronic form.
  - Smaller operators also support online functionality if it is more efficient.
  - Online functionality will simplify the tasks for operators and WAHVA personnel (e.g. application checks) – reduce paper-based form and manual errors in applications.

14. Review and restructure online WAHVA content

- The WAHVA web pages contain too much information and are confusing to navigate.
  - Web content has proliferated over a long period of time without regular review.
  - A gap exists between the expectations of industry and what is provided by Main Roads, related to contemporary, relevant and accessible information (e.g. latest industry news, Q&A section, KPIs).

15. Optimise and automate reporting systems

- Reporting processes are manual and not conducive to further automation.
  - Complex reporting systems/interfaces in Main Roads create duplicated reporting workflow. Resulting in information that is outdated and lost between different reports.
  - The process of data sharing between permitting and accreditation teams in unclear.
  - The permitting team has to request information regarding accreditation status.

16. Develop and implement internal and external communication plans

- Communication processes are not effective to notify stakeholder of their requirements.
  - Operators and auditors cite a lack of communication from Main Roads regarding changes in the WAHVA scheme, current processes and training materials.
  - Varied communication with stakeholders results in interpretation issues and frustrations with the future direction of the WAHVA scheme.

**Current state**

**Stakeholder feedback**

- "[There should be] online or app based applications for mobile phones"
- "Increased use of online applications and data management"
- "Get rid of paper based forms, move to online only submissions"
- "An up to date website to apply online for permits / Amendments ETC"

- "Some simplification of the Main Roads website would be of benefit, it can be difficult at times to find the relevant information required"
- "If not used regularly, WA main roads website is complex..."
- "[Would be an improvement] having a website that is more user friendly and more up to date, with old information deleted"

- "Telematics is the future, allow these reports and data uses to be used for compliance audits - Mainroads WA need to invest in better online systems themselves"

- "Better communication from main roads"
- "More discussion and consultation with operators of the scheme..."
- "More industry consultation ... Training provided by Main Roads on the WAHVAS"
# 03 | Administration

Administration recommendations are based on current state analysis and stakeholder feedback.

## RECOMMENDATIONS

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>17</td>
<td>Develop and implement a stakeholder service standard</td>
</tr>
<tr>
<td>18</td>
<td>Review the incidents investigation process and link to accreditation status</td>
</tr>
</tbody>
</table>

## Current state

- **Inconsistent information and knowledge of the WAHVA scheme exists within Main Roads**
  - Lack of scripts/standards how to communicate with the stakeholders through different channels, such as phone (helpdesk), e-mail, etc.
  - Lack of internal trainings that explain the accreditation process and how to work with different stakeholders.
  - Stakeholders receive different inconsistent answers from different Main Roads employees. For example, different employees have different opinions on the Mass management module.
  - Lack of internal standards on how to check forms/reports that are submitted by operators.

## Stakeholder feedback *

- "You get a different answer every time you speak to a different phone operator at Main Roads!"
- "Not being able to talk to people who actually know the system we get referred to "my manager" will need to answer that".
- "For the massive amount of time and work involved (and money) there are zero penalties for the people who choose to simply not do it!!!!!"
- "Penalties for non-accreditation"
- "Every extra modules added to auditing adds to cost of business, can it be demonstrated that we are improving safety?"

*Stakeholder feedback is listed as an example of the opinions drawn from consultation. This feedback has been considered against other data and information provided from other stakeholders, Main Roads and publicly available sources to develop recommendations.
There are several areas of process improvement in the existing accreditation processes.

The review of accreditation processes highlighted that the intended workflow is understood within Main Roads and relatively straightforward. The varied execution of this process and the changing expectations of operators have created issues with consistent communications, a lack of electronic or online workflow.

- Varied communications through multiple channels has led to differing understand and interpretation of the WAHVA requirements by both operators and auditors.
- Limited IT availability for accreditation request or audit submit (through email or paper-based) creates additional channels and manual work necessity for Main Roads accreditation team.
- The quality of audit results are inconsistent, resulting in rework and potential intervention by Main Roads.

**Current state process**

**Future state improvements**

1. Recommendation 4 and Recommendation 13: Develop and promote electronic workflow for accreditation to encourage the use of available online portals and reduce unnecessary manual activity and generation of additional paperwork.

2. Recommendation 17: Develop and implement a stakeholder service standard to establish consistent feedback to operators and auditors.
WAHVA stakeholders are continually improving their digital maturity, requiring Main Roads to be positioned as a Strategic Partner to the industry, and a fast follower of market trends.

**Orientation & Focus**

- A significant shift is required to move from a responsive and transactional provider to an industry partner.
- The WAHVA team needs to work with the industry to understand the macro trends and at the same time to help support and shape the direction of digital services.

**Transfer to digital**

- Current digital tools such as RAV and Moves should be reviewed and promoted more broadly with the operators (anecdotal evidence suggests that less than 10% of operators use the available digital tools).
- To meet the expectations of stakeholders, the WAHVA team should be positioned as a ‘fast follower’ of digital trends, mimicking the industry readiness to be a digital partner by developing and implementing contemporary online and mobile systems for accreditation.
04

AUDIT MANAGEMENT
04 | Audit management

Audit management recommendations are focused on a risk-based audit methodology, auditor independence and audit quality

Audit recommendations from the Strategic Review:

- C Enhance the digital presence of the scheme through Main Roads WA’s website.
- K Develop a risk-based audit methodology.
- I Improve the audit regime through targeted quality improvements.

RECOMMENDATIONS

19. Implement a risk-based audit methodology.
- Design a risk-based audit methodology reflecting prior compliance and operational performance.
- Develop KPIs for audit quality (i.e. number and/or reduction in audit returns).
- Undertake regular quality assurance for auditors, conducted by Main Roads. Publish anonymised findings to allow for continuous improvement.

20. Develop a mandatory policy for auditor independence
- Develop a mandatory policy for auditor independence, including prohibiting the provision of non-audit services.
- Enforce clear guidelines for the identification and notification of real and perceived conflicts of interest.
- Investigate the feasibility of requiring a mandatory rotation period for auditors.

21. Optimise quality standards for auditors
- Establish clearer quality standards for auditors and align with risk-based methodology.
- Implement regular quality assurance for auditors. Reviews could be performed by Main Roads. Investigate an opportunity to transfer the Global Exemplar role to Main Roads and/or review the verification process.

22. Establish standardised audit reporting requirements
- Categorise audit returns (from critical errors to minor errors) and record statistics on annual and random audit returns.
- Establish standardised audit reporting requirements and create online forms to allow data consolidation.

23. Optimise and automate audit report
- Revise audit report form. Delete duplicated fields and automate the notification of required fields.
- Develop online and mobile functionality to reduce manual handling and non-standard data entry (e.g. online forms, pre-filled lists).

24. Investigate establishment of an audit panel to be managed by Main Roads
- Investigate the ability to conduct audits through the establishment of a third party panel, with audit expenses aggregated and monitored by Main Roads.
- Allow for remote audit procedures to be performed more regularly, to accelerate audit cycle times and reduce costs associated with travel.
04 | Audit management

Audit management recommendations are based on current state analysis and stakeholder feedback

<table>
<thead>
<tr>
<th>RECOMMENDATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>19</td>
</tr>
<tr>
<td>20</td>
</tr>
<tr>
<td>21</td>
</tr>
<tr>
<td>22</td>
</tr>
</tbody>
</table>

**Current state**

Audits are not targeted to address the risks present in the WAHVA scheme.
- Conflicts of interest between auditors and operators are frequently cited.
- The quality of audits is variable and open to interpretation by the auditor.
- Audits have become a paper-based process and 'tick and flick' exercise rather than supporting the WAHVA scheme in delivering improved safety outcomes.

Auditors are not routinely citing conflicts of interests when conducting their services.
- Anecdotal evidence suggests that some auditors have sold non-audit products and services (e.g. management systems, commercial advice) to the same operators that are receiving audit services.
- Conflicts of interest are rarely identified or reported, despite anecdotal evidence suggesting these practices are widespread.

The lowering of audit quality has resulting in a large number of returned audits.
- Auditors are not held accountable to deliver high quality audit results, with a perception by operators and auditors that too many low quality audits are not investigated by Main Roads.
- Exemplar Global does not provide substantive or timely feedback to auditors to provide the necessary quality assurance.

Audit quality through the WAHVA scheme is not reported.
- Over 20% of audit results returns are due to minor/immaterial errors in the audit forms.
- Analysis needs to be performed on random audit results and identify the predominant cause(s) of low quality audits.

**Stakeholder feedback**

“The real focus must be on safety on the roads. It would be good to see what Main Roads believes the main risks on the roads are. There must be accident investigation data out there”

“The current WAHVA audit regime as is with the NHVAS is a procedural and record based Audit based on historical records”

“Some auditors ticking and flicking audits online. Some operators have never met their auditor”

“Currently there is no requirement for auditors to rotate i.e. the same auditor can audit a business year on year. This has the potential to create familiarity between the organisation and auditor, and for the audit results to become potentially skewed”

“[MR should] improve the quality of the Auditors and the 2nd party audit process”

“It is the work ethic of some auditors which seems to be the issue. Closer/better monitoring of the Auditors is needed”

“Exemplar Global are very good at invoicing and not much else”

“Ensuring standards and scrutiny applied by Auditors is consistent between different auditors, ensure Auditors are not “soft” on some Operators and are doing their jobs correctly”

* Stakeholder feedback is listed as an example of the opinions drawn from consultation. This feedback has been considered against other data and information provided from other stakeholders, Main Roads and publicly available sources to develop recommendations.
Audit management recommendations are based on current state analysis and stakeholder feedback

RECOMMENDATIONS

23

Optimise and automate audit report

24

Investigate establishment of an audit panel to be managed by Main Roads

Current state

- The audit report and process is too reliant on paper-based workflow and manual entry, despite established WAHVA guidelines.
  - The audit report requires duplicated information to be entered.
  - Inconsistent data and reported statistics are produced from audit returns due to a lack of standardisation.

Stakeholder feedback

- "RW forms need to be designed better with a clear pass or fail, reduce the repeats in the audit report - make the generic items across all modules into a standalone module maybe"
- "Make the audit sheets electronic or online form rather than paper. We could enter the audit report straight into the main roads computer"
- "Electronic records should be accepted and be able to be sent directly to auditors for confirmation to save the travel costs"
- "Perhaps in the more remote areas technology could be used for the transfer of information and evidence to alleviate the need for face to face interviews for Compliance Audits or at least ONE compliance audit. Operators in the more remote areas are faced with high costs to comply with audit requirements with the cost of travel and accommodation"

The independence of auditor-operator relationships has been frequently questioned.

- Business rules and modules require physical audits, regardless of geographic location. For many Operators these procedures are paper-based, as the auditors do not currently inspect vehicles.
- Costs for travel are often borne by the operator, resulting in significant variance in the cost of a standard audit and perceptions of geographic inequity.

* Stakeholder feedback is listed as an example of the opinions drawn from consultation. This feedback has been considered against other data and information provided from other stakeholders, Main Roads and publicly available sources to develop recommendations.
04 | Audit management

Risk-based audit framework

Overview

Based on the information provided throughout the Operational Review, including the observations of key stakeholders from Main Roads and Department of Transport, it was recognised that Main Roads should transition towards a risk-based audit approach, including the use of data assets and risk typologies to focus limited audit resources towards the higher safety risk operators.

Key stakeholders also recognised that the transition to a risk-based approach will require a baseline framework to be established, around which the risk-based approach can be enhanced over time, through subsequent audit cycles, as the availability and application of data assets and risk typologies are improved.

We have designed the framework to assist Main Roads to establish the baseline risk-based audit program and enhance this program as it matures.

Current audit regime

The current WAHVA audit regime consists of three key elements:

• Entry and Re-Entry System Audits
• Scheduled Compliance Audits (each 12 months’ anniversary from accreditation)
• Random/Triggered Audits.

Deloitte’s strategic review identified the following themes in relation to the current audit regime:

• Complexity, manual nature and poor user experience of the WAHVA modules
• Inadequacy of the audit regime
• Focus on compliance and management systems, rather than driving outcomes that meet the WAHVA scheme’s strategic objectives
• Prescriptive nature of modules in ensuring a minimum compliance standard, lacking flexibility in the method of compliance and the ability to promote innovation or adoption of technology in the industry
• Absence of a link between accreditation and enforcement, including breaches of the requirements in the modules.
04|Audit management
Risk-based audit framework

Risk-based audit regime
A risk-based audit regime aims to direct limited resources towards the audit of those areas of greatest risk. The key to developing a risk-based approach is to gather and analyse multiple relevant data sources to:

- Inform the selection of audit samples.
- Monitor improvements as a result of audit activity.

We understand that the data sources currently available to Main Roads may limit the ability to immediately transition to a risk-based approach. To deliver a truly risk-based audit approach, may require the audit regime to mature over time, coordinated with the implementation of technology enhancements and the collection of data from multiple sources.

Requirements of a risk-based audit

- Main Roads to identify the available/desired data sources to inform the risk assessment of operators.
- Consider the hierarchy of risk factors and their alignment to WAHVA's strategic objectives.
- Collection and analysis of multiple data sources.
- Assess the risk profiles of operators and select audit samples.
- Develop in maturity as more data is collected and assessed.
- Improvements are monitored and risk profiles re-assessed.
04 | Audit management
Risk-based audit framework

Potential data assets that would inform the program

- Previous audit outcomes (non-compliance).
- Scale of operators (vehicles, drivers, hours, loads).
- Maintenance and inspection reports.
- WA Police – Accident reports and infringement notices.
- Incident investigation reports.

Current restrictions to implement risk based approach

- Limited and inconsistent capture of audit outcomes.
- Not capturing third party and operator data.
- Not consolidating all data sources to provide a holistic view each operator/driver.
- Requires agreement by Main Roads stakeholders of the risk factors and rankings to be monitored and inform the selection of audits.
04 | Audit management

Risk-based audit framework

Proposed framework

The following framework has been developed to assist Main Roads to implement a risk-based audit regime and enhance it over time. This framework is based on six principles, which should be reassessed periodically to determine the effectiveness of the risk-based audit program. Data assets would be maintained to determine the relative ‘scoring’ of each operator against the principles, which would aggregate into an overall risk rating.

Risk ratings for each operator would be used to determine the frequency and nature of future audit activity.

<table>
<thead>
<tr>
<th>Risk-based audit principles</th>
<th>Indicative data assets</th>
<th>Operator risk rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scope</td>
<td>Incidents</td>
<td>Operator B</td>
</tr>
<tr>
<td>Risk Factors</td>
<td>Roadworthiness</td>
<td>Operator A</td>
</tr>
<tr>
<td></td>
<td>certificate</td>
<td>Operator D</td>
</tr>
<tr>
<td></td>
<td>Age of fleet</td>
<td>Operator C</td>
</tr>
<tr>
<td></td>
<td><strong>Traffic inspector</strong></td>
<td>Operator E</td>
</tr>
<tr>
<td></td>
<td>work orders</td>
<td><strong>Operator A</strong></td>
</tr>
<tr>
<td></td>
<td>Accreditation ‘level’</td>
<td><strong>Operator B</strong></td>
</tr>
<tr>
<td></td>
<td>Distances travelled</td>
<td><strong>Operator C</strong></td>
</tr>
<tr>
<td>Sample Selection</td>
<td><strong>Previous audit</strong></td>
<td><strong>Operator D</strong></td>
</tr>
<tr>
<td></td>
<td>outcomes</td>
<td><strong>Operator A</strong></td>
</tr>
<tr>
<td>Risk Profiles</td>
<td><strong>Operator / auditor</strong></td>
<td><strong>Operator E</strong></td>
</tr>
<tr>
<td></td>
<td>relationship</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Load and mass</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>capacity</td>
<td></td>
</tr>
</tbody>
</table>

Indicative data assets include:
- Incidents
- Roadworthiness certificate
- Age of fleet
- Traffic inspector work orders
- Accreditation ‘level’
- Distances travelled
- Previous audit outcomes
- Operator / auditor relationship
- Load and mass capacity
## Operational Objectives

### Risk-based audit framework

<table>
<thead>
<tr>
<th>FRAMEWORK ELEMENT</th>
<th>PURPOSE</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Risk-Based Audit Policy</strong></td>
<td>Articulate the purpose of transitioning to a risk based audit approach, including the interaction with other audit approaches and estimated coverage of each audit approach.</td>
</tr>
</tbody>
</table>

### Risk-Based Audit Principles

| Scope                        | • Determine the extent of audit effort to be covered by risk-based approach.  
                                | • Articulate how this approach will supplement, compliment or replace other audit activities. |
|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| Risk factors                | • Determine the key indicators or profiles of operators that are indicative of safety risk.  
                                | • Consider the collective approach to identify and risk rank these indicators. |
| Data assets                 | • Identify and secure available data assets.  
                                | • Determine approaches to secure external data assets, from other agencies and operators. |
| Risk profiles of operators  | • Create operator profiles based on risk factors and ranking.  
                                | • Validate and recalibrate risk ranking if required. |
| Sample selection            | • Determine approach to select audit sample, considering timing and frequency of selection and audit program.  
                                | • Consider coverage and equity of sample selection across all tiers of operators. |
| Feedback and refine         | • Determine the frequency to update data assets and associated risk profiles.  
                                | • Consider additional risk factors, typologies and profiles based on audit outcomes and feedback from auditors. |
05

OUT-OF-SCOPE CONSIDERATIONS
05 | Out-of-scope considerations

Operational review recommendations directly related to the out-of-scope considerations from the Strategic Review:

3. Affirm ‘safety’ as the primary strategic objective for the scheme.

4. Investigate the ability to enhance data sharing agreements between public sector agencies.

5. Conduct an end-to-end process review for accreditation and permitting.

6. Identify processes to be reviewed for potential application of electronic workflow, interface with mobile applications and process automation.

7. Create processes and communication templates to generate educational examples for the scheme’s participants.

CONSIDERATIONS

25. Develop and establish guidelines for local governments
- Establish guidelines for local governments that establish consistent approaches and processes for interactions with the WAHVA scheme.
- Provide greater guidance to operators and LGAs on the expectation for the WAVHA scheme in relation to community consultation and fees.

26. Review the structure of the Ministerial Heavy Vehicle Advisory Panel
- Review the structure and membership of the Ministerial Heavy Vehicle Advisory Panel in order to give opportunity to other industry stakeholders and navigate any perceived conflicts of interest.

27. Review permitting process
- Review and reduce number of permitting categories and develop clearer guidelines/instructions for applicants.
- Review permitting and access processes’ lead time in order to find the review loops and waste within the processes.
- Simplify the process for re-entry permits. Set cycle (lead) time KPI for re-entry permitting process.

28. Reinforce the use of MOVES and RAVS
- Cleanse existing data and establish which technology platforms/applications can be removed/consolidated.
- Reinforce the use of MOVES and RAVS as a means on simplified online processing and aim to expand the coverage of operators that use WAHVA systems.
- Develop additional online and mobile functionality for permitting process to reduce manual handling. Control of non-standard data entry can improve workflow and potentially allow for automation.
Appendices

- Stakeholder Survey
- Workshop Data
- Stakeholder Interviews
A1

Stakeholder Survey
What changes could be made to WAHVA for it to meet its objective of ‘Improved safety, productivity and community confidence’ and drive an industry culture of continuous improvement (including the enforcement of WAHVA and initiatives to ensure operators are compliant and engage in best practice)?

- Road worthiness inspections instead of /in addition to WAHVA
- No changes necessary as the whole system is already far to onerous
- STREAM LINE ITS PERMIT ASSESSING PROCEDURE
- Why do they mainly pick on heavy haulage as in semi trailers/roadtrains . and know I don't own or drive a semi or road train, there are hundreds of truck driving around Perth on a few are targeted. i have sent a picture thru to compliance of an unsafe load with a clear rego. no answer. i have rang them and told them of insecure loads coming out of pickles Bibra Lake. can you take photos. no I cant in the middle of there yard taken photos. if they want respect from and confidence then cover all transport. maybe your company should visit transport companies at random. small owner operators. go visit the truck stops.
- Less paper work
- Quicker processing of paperwork ( eg Fatigue management any mistakes can be dealt with and rectified in a short period of time ) speeding up the process
- Require mandatory independent pit inspection annually to license all WAHVA vehicles. Be consistent, for example if a road is suitable for triple stock crates then it is suitable for all triples.
- Provide resources to assist operators achieve compliance.
- A more common sense approach that actually improves the safety of trucks on roads, not just completing required paperwork, in actuality this has not improved safety
- I believe that the WAHVA needs to stop changing. It is difficult enough trying to keep up with requirements of the WAHVA as it is, the goal posts seem to be continuously moving and as a small operator it becomes overwhelming. The volume of paperwork/office work at the moment is enough to discourage small operators out of the industry all together as it is becoming too costly.
- Hard to make more changes without the scheme being to onerous on owners. the level of red tape is already to high. Maybe drug testing
- encompass all vehicles including those under 4.5T
- introduce WAHVA improvement notices for non compliant vehicles or operators. Put a stop the increasing adversarial attitude of on road enforcement to a culture of cooperation. Work with industry not against.
- Would love to see procedures put in place that actually contribute to safety as opposed to merely generating more paperwork and stress for people. As it stands every year we spend more and more hours on our accreditation paperwork and it feels very much like Main Roads are merely finding more ways to pass the bass back to us if something goes wrong. Our company has a very positive outlook on the industry and are constantly looking for ways to improve our operation but the insane amount of time the accreditation takes these days is quite demoralising. I really feel the time could be put to better use if the outcome is indeed improved safety.
- When forms are not correct on submission eg tick the box ,the operator should be contacted and if applicable the correct box be selected by staff so the application can be processed and finished being handled only once instead of resection and back to the start remember truck drivers were not necessarily all good at school.
- Changes outlined in following replies
- There is a lot of paperwork involved to stay compliant, puts pressure on the drivers as they have to spend time on filling in paperwork instead of getting on with their job.
- Match the Eastern states regs
What changes could be made to WAHVA for it to meet its objective of ‘Improved safety, productivity and community confidence’ and drive an industry culture of continuous improvement (including the enforcement of WAHVA and initiatives to ensure operators are compliant and engage in best practice)?

- Nil, even this slightest change to the system seems to bring vast benefits to us as a user especially when compared to the NHVR
- I believe our equipment should be put over the pits every second year, a reduction in licensing if this is done as an incentive. There would need to be an independent body set up for disputes so that inspectors or owners can be settled independently
- Needs to be more policing on the highway to ensure operators of high productivity vehicles are accredited. I believe the practice of allowing companies just to be casually added to an accredited operator’s scheme just for the odd trip here and there needs to stop. That one trip could be the one an operator has a problem on because they were not properly accredited to do the run with the configuration. Those who take accreditation seriously then are forced to share the highway with uncommitted operators. Truck safe is a scheme that takes in maintenance, fatigue, training, driver health, load restraint, management - mutual recognition would be a welcomed cross border harmonisation initiative.
- Consider putting the machinery over the pit for 12 monthly machinery inspection as self assessment can lead to equipment not being maintained to an appropriate standard as we know paper trails can be manipulated.
- We need more manners on the road not more rules!
- Reduce the focus on paperwork & compliance and replace that with an increased presence of authorities on the road.
- More ACURATE media coverage
- National consistency
- Putting all vehicles and trailers over the pits every 12 months. Thus creating jobs and ensuring safe vehicles on the roads. Having a log book for vehicles travelling outside a 150km radius from the home depot.
- Get rid of mass management scheme. Bring back a level playing field.
- Make companies operating heavy vehicles make available to auditors axle group weighing’s of their biggest rig fully loaded at least once if they claim that they do not need mass management accreditation
- Make consignors of freight more aware of rules that we are faced with
- Make it more simple less paperwork
- The paperwork needs to be streamlined. Maintenance, Fatigue and Load security doesn’t need too much paperwork
- Remove onerous and unnecessary regulations. Get Western Power to raise its power line heights to the same as the rest of the country. Issue height permits for RAV on a yearly basis to that of Stock trucks, remove the need for flags to be attached to the sides of trucks (waste of time and resources as they do nothing). Allow rear pilots to be authorised but not needed to be accredited. Remove the unnecessary requirement for pilots to have to do a refresher course every 3 years.
- I have been in the transport industry for 40 years, a paper trail does not make the road any safer, peoples attitudes need to change, from the management to the yard staff, it is easy for some to complete a module on the internet but putting it into practice with the right attitude is where we seem to come unstuck
- Nothing! It already is the safest state for road transport
- It seems to be working ok
- There needs to be a greater link between on road enforcement and the audit process so any non conformance on the road should be available to the auditor. As of right vehicles should have to get inspected or get accredited
- 2 categories of operator, professional and seasonal.
Stakeholder Survey
Summarised raw feedback

What changes could be made to WAHVA for it to meet its objective of ‘Improved safety, productivity and community confidence’ and drive an industry culture of continuous improvement (including the enforcement of WAHVA and initiatives to ensure operators are compliant and engage in best practice)?

- Educate Drivers of cars of how to give trucks more room when driving.
- Increased use of online applications and data management.
- This question is 3 questions in one. how are you supposed to answer that?
- Strobe style LED lights should be allowed since the regular rotating beacon fails constantly on the road up north.
- Target the guys that are doing the wrong thing. Also look at people rewarding the unsafe behaviours through cheap contracts
- Less focus on enforcement, more focus on training and support
- An up to date website to apply online for permits / Amendments ETC
- From my perspective most elements are captured which is leading to a safer transport routes.
- Make the paperwork less complicated
- Carrot rather than stick !
- Simplify it
- Have different levels that cater for small, medium and large fleets. The red tape involved is lost productivity for farmers who are owner / operators and low users of the network with the same compliance as fleets
- 1. Change the measured combination length to include trailing equipment only to allow for larger, better appointed, sleeper cabs for long distance drivers. 2. Change the system for splitting of road trains on great eastern highway and Albany highway to a weight based system rather than length based to improve efficiency of lightly loaded or empty trucks in entering the Perth metro area
- It would be useful to list audit results and compliance details online, similar to the permits in MOVES.
- Very Happy with the Status Quo
- A Licence discount to operators who meet the highest standard, and opposing license increase to operators who do not meet the standards
- Provide more easily accessible information
- Gravel road max 80 kms
- Streamlined paperwork and enforcement of rav routes
- improve driver training
- Mandatory driver drug tests
- Make it easier to find RAV online
- More compliance checking and active management by properly trained knowledgeable inspectors. Expand the process to all heavy vehicles not just those that are WAHVA accredited. make sue that there are inspectors out on the roads on a regular basis and make sure that they are trained properly in how to deal with humans as an inspector with a bad attitude does more harm than good because they gain zero respect from the operators
- Reduce requirements on small single truck operators who have minimal oversize loads
- Improved Notification of Changes and updates to policy.
- Accredited companies to be able to “one touch permits”
- More information meeting/field days
- Nil changes identified
- The paper work needs to be verified against the vehicle to make sure work is being done. 
What changes could be made to WAHVA for it to meet its objective of ‘improved safety, productivity and community confidence’ and drive an industry culture of continuous improvement (including the enforcement of WAHVA and initiatives to ensure operators are compliant and engage in best practice)?

- The standards are nearly 20 years old and technology of not only the vehicles but the way business manage their operation has changed.
- Provide accredited training for new operators other than web based information.
- I don't know. From our perspective it seems to work okay as it is.
- Ensure operators big and small are treated equally and/or exempted where necessary.
- Check drivers more.
- WE are a transport company based in Brisbane so only go to WA a couple of times a year. Our main route is Adelaide to Brisbane and our drivers are often checked for the required NHVAS certificates etc., but they don't seem to ever be checked when they go to WA. Some drivers come to us for jobs and say they have been driving for companies under Fatigue Management for companies going to WA but don't know about the required ‘Commercial vehicle driver apply fatigue management strategies’ (the old TFIL2010).
- National consistency.
- More engagement by regulator with forums, updates and disclosure of expectations.
- Where possible, align your systems with NHVR.
- Community Confidence, would be the general road users understanding the logistics of how heavy vehicles work. Show respect and patience to the heavy vehicles. Operators need to be trained to understand this is a profession not like old days.
- Although Fatigue is covered by another regulator, I believe this area needs to be reviewed.
- Remove PBS and limit tri axle groups to 20 ton except on containers, livestock, and indivisible items.
- Simplicity, most operators aren’t rocket scientists.
- No changes required.
- Other than bureaucracy nothing.
- Making individual operators who operate under large company accreditation operate under their own accreditation and complete their own audit.
- Pretty straight forward, two 24hr breaks per fortnight are the only difficulty for us but the day limits are more than we would ever do. If there were an option to work shorter days all week over harvest (approx. 6 weeks) without the regular days off that would be easier to manage (max 14 hour days with one 24 hour break per fortnight?).
- I think The system needs to be simplified. Also laws and regulations shouldn’t be open to so much interpretation. Also we need to have a more current form of training courses developed and mandatory for all drivers, as there are a high number of drivers who still go by old laws and rules which now have changed.
- Enforce the current regulations, no changes to be made.
- I would like 2 c the practise made that oversize is oversize and all the bells and whistles apply i.e. flags signs and flashing lights even if the load is 1mm oversize.
- Less paperwork. More vehicle inspections, as far too many people are compliant on paper and not in practice.
- All heavy vehicles need to be subjected to accreditation, whether you have 1 truck 1 trailer around town or triples the whole industry needs to be on the same playing field.
- DSS units in long distances road trains with out the camera if I had this 20 yes ago my liver and kidneys would not be so damaged.
What changes could be made to WAHVA for it to meet its objective of ‘Improved safety, productivity and community confidence’ and drive an industry culture of continuous improvement (including the enforcement of WAHVA and initiatives to ensure operators are compliant and engage in best practice)?

- We need to change the term BEST PRACTICE to GOOD PRACTICE in all our policies and processes, to make it more authentic, real, creating better outcomes across the Transport industry. Whilst the concept of having a benchmark to reach in theory is understandable, if you have been in the industry long enough, you know that this has been a formality for some, it has been achieved and the certificates are issued but a company can claim to be ‘accredited’ etc. but the real time experiences may be different. We need to firstly look at our policies and PROMOTE GOOD PRACTICE. Best promotes a culture of a TICK BOX exercise and in the mindset of Management and Regulators, apathetic. The mindset is a closed statement, not allowing what we strive for, continual improvement with a living system, every day in the life of the truck driver, not just the relationship between the AUDITEE and AUDITOR doing their best!
- Do away with the forest of paperwork and design a digital system that gives online relevance to all transport operators in this modern world. Understand that not everywhere is there internet coverage or mobile phone reception, but if the system was designed to be simple to operate then it would achieve all the objectives required by everyone involved in the transport industry.
- Need to change loading and dimensions, we do up 2 100 loads a day, and have a manifest with the cargo in containers.
- GPS tracking to monitor speed... MC licence for double. MC+ licence for road trains for new licence drivers only...
- I love the way that Western Australia does things. The problem is that until every state and territory comes under the one rule book it’s a dogs breakfast nationally.
- Less paperwork. Reduce constant changes.
- Let us have more axles per trailer so we're not over length but can carry more.
- Approval of more rav network roads in regional areas to C train capability.
- I am happy with the current system.
- Days and hours driven in large companies.
- Get real truck drivers involved and listen to what they have to say.
- Base services on kilometres, not time.
- Again put all heavy vehicles over Pitts every twelve months to give a certificate of fitness to be on road this would take a lot of pressure of inspections and police.
- Simplify the accreditation process, only what is necessary.
- Safety aspect doesn’t need changing. Needs changing to suit small fleet operators who don’t do large kilometres. is designed more for fleet operators at the moment.
- Have a stronger compliance enforcement at he WA border from SA.
- WAHVA need to ensure that changes to regulations reach the drivers. We are mostly kept informed by other drivers who have ‘been fined’ or have heard ‘word of mouth’ that (for instance) there are new rules to trailer lengths in SA. I receive updates via internet but not with what I would consider critical information. WAHVA also needs to really, really look at fatigue and stop forcing drivers to stop when they are wide awake. Having a man/women stop just because the book says so is incredibly dangerous. Make the regulations realistic so it’s working for us drivers, not against us.
- More on road information and checking of vehicles. Not necessarily infringements but more information to drivers.
- Widen the Wubin - Mulewa Road, nth of Morawa, to 8 mts?
- Better training of foreign workers.
- None. For me with one truck doing 15000 km a year the compliance is too rigorous.

Summarised raw feedback
Stakeholder Survey

Summarised raw feedback

What changes could be made to WAHVA for it to meet its objective of ‘Improved safety, productivity and community confidence’ and drive an industry culture of continuous improvement (including the enforcement of WAHVA and initiatives to ensure operators are compliant and engage in best practice)?

- Developing and adopting technological methods such as apps to make the information, registration and implementation of permits, routes, training and maintenance easily accessible.
- It really needs to be streamlined and duplication removed especially for smaller operators of 5 trucks or less. For that group it is top heavy in bookwork, and takes the owner excessive time completing office work and not on the ground seeing to drivers and smaller issues that are really better to be dealt with.
- Make it something that industry wants to do not something that its forced to do. Also educate the general public how to behave around trucks and to realise that everything that they wear, drink, eat, is carried by a truck so they are very much needed and are not the enemy.
- Continue to ensure all operators and drivers are operating within their limits, focusing on operators that fail to try and work within the boundaries.
- Join the NHVAS
- Every piece of legislation introduced re heavy vehicle compliance, has cost operators more money to comply. Every little change, whether it be an audit from a non professional individual telling us how to run a business, costs operators more. Everything, and I mean everything introduced by the government to make things [apparently] better for all involved costs operators more money to implement or comply. Not once have we been paid any more to operate since accreditation inception. Every day we go to work we work for less than the previous day. Any survey or enquiry that does not relate safety with remuneration is a farce. Implement a base rate to cut out the fleas, and maybe we could operate more successfully.
- More money for operators
- There needs to be changes made. We do approx. 20 k a year in our truck and have to do the same paperwork that full time contractors do.
- Be harder on quality of equipment
- Don’t think there is any changes needed
- Having a clearer and better understanding of the ever changing rules with WAHVA would assist greatly, you cannot ring and ask advice or for a better understand to any department, it up to the company to try and interpret the “rules” as they can.
- Should extend to semi trailer operators, not only permitted vehicles.
- Include all transport methods over 4.5 ton gross including caravans and trailers
- More enforcement to improve compliance on single trailer operators.
- Make the process simpler for farmers only using trucks on a seasonal basis
- Crack down on transport companies who undercut on price and therefore take shortcuts on safety.
- Have a look at the question you just asked. How ambiguous is it? How many different questions in one question. What fool wrote this??? Seriously, if you want safety and compliance, keep it clear and simple. You haven’t. The rules and regulations are complicated, over regulated. So how can you possibly get high compliance when the industry doesn’t have any respect for these clowns and the rubbish they produce?
- Website isn’t very easy to follow exactly what you need to do to comply
- Please just integrate with NHVAS, the additional red tape of two schemes is counter productive
- For single/small owner drivers the process could be simplified. For instance, a separate site that is specific to those types of operations.
- Scrapping the AMMS
- Every operator is compliant or we wouldn’t have a permit Ythe paperwork is tedious enough as it is.
- That operators who travel less than 20000km a year, are exempt from the accreditation process.
Stakeholder Survey
Summarised raw feedback

What changes could be made to WAHVA for it to meet its objective of ‘Improved safety, productivity and community confidence’ and drive an industry culture of continuous improvement (including the enforcement of WAHVA and initiatives to ensure operators are compliant and engage in best practice)?

- Truck pit tests instead of paper work
- Have a decent web site operators can join
- The big companies be treated the same as owner operators
- Stop giving us so much paperwork
- Exclude farmers from fatigue logbook. It’s not relevant
- I think the industry is doing enough with the accreditation system in force & the audit process attached to it
- Use the drivers past driving record as a bonus
- The rates have to be increased so people can afford maintenance
- Make it less complicated by a breakdown of kilometres travelled
- Teletrac navman systems in all trucks monitoring fatigue, speed, mass, and correct networks
- More Inspectors as I believe a lot of operators are managing to avoid doing the right thing. Also more community awareness to the public especially over peak periods about heavy vehicles, country driving and fatigue in holiday makers.
- Forget WAHVA FOR Farmers and physically examine their truck
- It is ridiculous that a farmer who does 5,000 kms per year from his farm to the local receivable bin has to do the same paperwork and undergo the same audit as a driver who does a million kms a year driving back and forth across the Nullarbor.
- The local councils need to improve road conditions. You can apply as many safety regulations to the trucking industry. But at the end of the day the maintenance of the roads in the country are so far behind the regulations it makes it impossible to implement the scheme with confidence. Councils should be made to bring their roads up to scratch or at least submit a plan of a yearly budget to do so. Just can’t be the drivers and Owners of Heavy haulage taking all the heat. It is disheartening when you are trying your best to adhere to permit conditions.
- Don’t change a thing - they are improving continually, consulting with the industry, keeping us informed, identifying our needs, helping us improve and understand their proposed improvements.
- Make the AMMS system of accreditation simpler and easier. Maybe just incorporate it with the licencing system
- The Department of Transport making to many rules regulations for the owners/ drivers to even comprehend, even the accreditation officers can’t keep up with all the red tape.
- H v o drivers licenses to require more regulation, why they are issued with minimal training make a dangerous work environment. If you can’t understand basic English and have no previous experience with heavy vehicles yet you can get through the system with ease
- Online version
- Less paperwork, the use of technology like smart phones
- Scrap the WAHVA is to expensive, time consuming and achieves nothing
- More Adverts on TV re driving in and around Heavy Vehicles. Install Weight Bridges at Apple street and Northam Road Train assembly, and Bedfordale Road train Bays. The bridges need to be able to weight Multi axle roads trains, and Platform Trailers that are over 4.5 spread and so its a big weigh bridge. Make some serious enforcements and make sure the media get it our there.
- All trucks and trailers should be inspected to pass roadworthiness every 3 years including all vehicle registered Over 4.5t
- More advertising to the main stream public regarding safety around trucks
What changes could be made to WAHVA for it to meet its objective of ‘improved safety, productivity and community confidence’ and drive an industry culture of continuous improvement (including the enforcement of WAHVA and initiatives to ensure operators are compliant and engage in best practice)?

- I think there needs to be a booklet written by a tuck driver with main roads stating all the rules and regulations so we as drivers can understand them correctly.
- More discussion and consultation with operators of the scheme to understand first hand the sustainability of the scheme and take on board ideas and suggestions. Where roads are approved for RAV there should be no reason to have a letter of approval from the local shire as well - this is a complete waste of time for all involved - main roads should override the local government authority.
- Revamp the license scheme. These truck driving trainers, license issuers are a joke. Just a money making venture. The quality of operators is very poor.
- More enforcement operators on the roads and checking paperwork fatigue, drivers medicals, permits.
- Ensure all heavy vehicle operators are treated fairly including the large company’s that don’t seem to be intercepted.
- Or company already does this.
- A more transparent system between Hvo and the police.
- Have less rules.
- Write permit applications in easy to understand ENGLISH, instead of lawyer style, so that operators can apply and comply with the rules foisted upon us.
- DO THINGS THAT IMPROVE IT FOR TRANSPORT INDUSTRY.
- Have one national scheme that incorporates animal welfare.
- Companies made accountable for suitable timing from when transport leaves yard to its expected arrival at Point B.
- Basic program form pilot/escort vehicles that operate off farms or agricultural sectors.
- all systems work well as far as our company is concerned. don't change if it isn't broken.
- Operator Audits less frequently.
- CURRENTLY SATISFIED AS IS
- Affordability
- Electronic Log Books
- Make it applicable to only full time operators. not small businesses that use a truck from time to time.
- Monitor and regulate road closures and bridge works - as the industry grows and operational requirements are more urgent implementing a system where minor amendments can be made weekends and after hours - not all information transporters are given is accurate and on arrival some dimensional changes are required to continue - moves should be able to accommodate this when its working.
- Less paperwork, it's too much for drivers.
A2

Workshop Data
Workshop Outcomes
Online Polling – Question 1 of 3

What major trends will impact the heavy vehicle industry in the coming five years?
Workshop Outcomes
Online Polling – Question 2 of 3

Where is communication on the WAHVA inadequate?
Workshop Outcomes
Online Polling – Question 3 of 3

How would you prefer to receive communications in the future?
### Workshop Outcomes

**Facilitated Discussion - Data sharing across Government agencies**

<table>
<thead>
<tr>
<th>What duplicated information do you currently provide to State Government agencies?</th>
<th>What information would you be comfortable to share across State Government agencies?</th>
<th>Is there any information that you would not want shared across State Government agencies?</th>
</tr>
</thead>
</table>
| • DG Medical Commercial vehicle drivers, Pilot license  
• Suggests duplicated Government Agencies  
• Duplicated Vehicle licensing between departments  
• Fleet list per Co.  
• Incident reporting, Medical + Fatigue, Training records  
• State government vs. Local government duplicate  
• REGO  
• Medical to be profile on drivers license for all | • DoT to provide all vehicle details  
• Share non-compliance info between Worksafe + Main Roads  
• Non-compliance and regular breach  
• Main roads HVS + DoT direct portal  
• Regulatory breach history  
• Info provided to one agency does not automatically share to another  
• Approved permits for industry  
• Visibility is crucial: hopefully just about everything while protecting individual crucial business info and ensure data is safe within approved agencies  
• Does ownership of information transfer when it is shared? Answer = comfort level  
• Stats showing improvement + deterioration in safety outcomes | • Compare own data with collective data (all industry)  
• Online demerit checks – all info displayed at all times (esp. on payment plans)Share data non-ID to company  
• Information that could get you into trouble should be subject to review and explanation  
• We have to be certain that info provided for planning will not be used for any other use  
• Commercial in confidence  
• Specific customer info – there must be ways to keep data useful but in confidence |
## Workshop Outcomes
### Facilitated Discussion - Enhancing the design of WAHVA modules

<table>
<thead>
<tr>
<th>Where can repetition in the WAHVA modules be reduced?</th>
<th>How can ‘fitness for work’ be enhanced in the WAHVA modules?</th>
<th>Are there other changes can be made to WAHVA modules, business rules and Operator’s guide?</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Centralized system administrated by Main Roads</td>
<td>• Wearable Tech real time information</td>
<td>• All modules to have common subtitles rewarded</td>
</tr>
<tr>
<td>• Module standardise – Trainings, Records,</td>
<td>• Review and improvement of Fatigue</td>
<td>• Expand to all other vehicles</td>
</tr>
<tr>
<td>Documentation, Internal reviews, Responsibilities</td>
<td>• ITS (Intelligent Transport System) makes this simple now –</td>
<td>• Review AMMS system</td>
</tr>
<tr>
<td>• Generic items across all modules or some into own</td>
<td></td>
<td>• Changes require consultation before implementation</td>
</tr>
<tr>
<td>module?</td>
<td>• Alertness, alcohol test pre-start</td>
<td>• Plain English</td>
</tr>
<tr>
<td>• Double in trainings, internal audit, management</td>
<td>• Electronic Work/trip sheets for fatigue</td>
<td>• Online audit reports</td>
</tr>
<tr>
<td>review</td>
<td>• Compulsory training course on fatigue management out</td>
<td>• Some assessment to validate a person 5 years</td>
</tr>
<tr>
<td>• Put AMMS under Dimension and Loading</td>
<td>of hours e.g. like airline</td>
<td>suitable experience (mechanical)</td>
</tr>
<tr>
<td>• Incorporate Mass Management under Dimension and</td>
<td>• Medical assessments recognised across government</td>
<td>• All vehicles above 4.5t to be accredited</td>
</tr>
<tr>
<td>Loading</td>
<td>agencies</td>
<td>• Portal accreditation</td>
</tr>
</tbody>
</table>
| • Join Dimension / Loading and Mass management        | • Bring in autonomous vehicles asap… than no issues      | • Medical for all – bus, DG, Commercial drivers,
|                                                     | • Medicals done by employment practitioners not own      | DoT                                              |
|                                                     | • Fatigue online linked with engine management          | • Include all commercial vehicles 4.5t above     |
|                                                     | • Industry nominated doctors or medicals to avoid doctor| accreditation                                    |
|                                                     | shopping                                                | • As of right accreditation                     |
|                                                     | • Review Drug & Alcohol policy, D+A Party of Medical    | • Electronic Signatures to audit reports        |
|                                                     | • O+A test part of Medical                              | • Encourage safety technology                   |
|                                                     | • Over East should adopt WA Fatigue rules               | • Roadworthy done by licensing or OEM           |
|                                                     |                                                        | • ABNs not required                              |
## Workshop Outcomes

### Facilitated Discussion - WAHVA Audit regime

<table>
<thead>
<tr>
<th><strong>How can the independence of auditors be maintained and strengthened?</strong></th>
<th><strong>What requirements for audits under the WAHVA scheme are unclear?</strong></th>
<th><strong>What criteria could be used to develop a risk-based audit methodology?</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>• Time between audits longer greater risk factor. Entities increasing requirements who are involved in business ... issues</td>
<td>• 3 years date on certificate confuses operators, independence of mechanic for roadworthy</td>
<td>• Certain infringements leads to being placed in random audit bucket</td>
</tr>
<tr>
<td>• Audits allocated by Main Roads rather than client appointed</td>
<td>• Impact of infringement notes</td>
<td>• Should AMMS auditors be more specialised</td>
</tr>
<tr>
<td>• If info is visible to all (e.g. community system PCS) then auditor independence is assured</td>
<td>• Go down the chain + stop ringing the driver</td>
<td>• Operator moving onto new area of operations = risk</td>
</tr>
<tr>
<td>• Auditors need accreditation 12 monthly to keep ahead</td>
<td>• Extent of quarterly audits – inconsistent</td>
<td>• Random audits remove past 5 years audit customers</td>
</tr>
<tr>
<td>• Change algorithm in random audit selection process</td>
<td>• Operator Guide instruction not clear</td>
<td>• HUAS portal</td>
</tr>
<tr>
<td>• Improve 2nd party audit system, design a different audit form, 2nd party on Operator not Auditor</td>
<td>• How come a container terminal can put an overloaded container on truck + not get pinged</td>
<td>• Request by Main Roads for quarterly compliance statements from operators</td>
</tr>
<tr>
<td>• $75 fees originally, $225 fee 3 years. Stakeholders / operators how is the audit process. Review major process. Roadworthy 3 years should be changed</td>
<td>• When are you going to go down the chain? No one knows</td>
<td>• Risk based audit methodology, Areas of concern, Risk Factors, Sharing of infringements with Main Roads</td>
</tr>
<tr>
<td>• Rotate auditors every 2 years but not to mates</td>
<td>• Training / Standards of internal auditors</td>
<td>• Infringements National vs. WAHVA</td>
</tr>
<tr>
<td>• Training for auditors</td>
<td>• Commercial vehicle drivers Medical, Clear exemption from Fatigue, Module vs. Fatigue Regulations</td>
<td>• Quality systems</td>
</tr>
<tr>
<td>• 6 monthly audits – increase frequency</td>
<td>• Link between infringement notes and Main Roads</td>
<td>• Info from telematics systems</td>
</tr>
<tr>
<td>• Roadworthy – independent, not employed by owner</td>
<td>• Operator Guide has comments no longer relevant to the requirements, confusion for small operators</td>
<td>• Pervious performance rewarded by less frequent audits</td>
</tr>
<tr>
<td>• Roadworthy – yearly, not 3 yearly</td>
<td>• Auditors gaining access to infringement notices prior to Audit</td>
<td>• Quantities emission measuring – noise and pollution</td>
</tr>
<tr>
<td>• MR performance review with auditors</td>
<td>• MR control auditors allowed to do audits</td>
<td>• Documental procedures ie. Audit check list. Auditor doesn't have to show independence if audit check list is really working</td>
</tr>
<tr>
<td>• Increase % triggered and random audits</td>
<td>• Auditors should only work with an operator for a prescribed time. Rotation of auditors will ensure integrity &amp; independence</td>
<td>• Rework audit results to a number to identify hood performers</td>
</tr>
<tr>
<td>• MR control auditors allowed to do audits</td>
<td>• Stop consulting &amp; auditing own system for 5 years</td>
<td></td>
</tr>
</tbody>
</table>
### Workshop Outcomes

**Facilitated Discussion - Risk trading**

<table>
<thead>
<tr>
<th>What incentives could be used to encourage compliance and continuous improvement?</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Incentives for use of smart plates + other its measures</td>
</tr>
<tr>
<td>• Port Reduced fee for after hours use: peak period price</td>
</tr>
<tr>
<td>• Allow common user no cost third party layover sites as in qld</td>
</tr>
<tr>
<td>• Increase mass with</td>
</tr>
<tr>
<td>• Provide data ie. Mass, Fatigue in return for less audits</td>
</tr>
<tr>
<td>• Recognition by regulator</td>
</tr>
<tr>
<td>• Good operator waved through roadside stop</td>
</tr>
<tr>
<td>• Tiered categories of operators that can be used in</td>
</tr>
<tr>
<td>• Marketing if you are top tier</td>
</tr>
<tr>
<td>• Self Assessment for those that can demonstrate confidence in their compliance</td>
</tr>
<tr>
<td>• High compliance demonstrated operators reduced audit frequency</td>
</tr>
<tr>
<td>• Top tier operators aren't audited as often</td>
</tr>
<tr>
<td>• 3 audits a row compliant can skip an audit</td>
</tr>
<tr>
<td>• Permit cost reduction</td>
</tr>
<tr>
<td>• Intelligent access improved data availability</td>
</tr>
<tr>
<td>• Rego cost reduction</td>
</tr>
<tr>
<td>• Compliance should aim to reduce costs and get a safe outcome</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>What changes should be made to penalties under the WAHVA scheme?</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Increase mass with harsh penalty for non-compliance</td>
</tr>
<tr>
<td>• N of intercepts per Co. with non-compliance</td>
</tr>
<tr>
<td>• Suspension of accreditation</td>
</tr>
<tr>
<td>• More tools</td>
</tr>
<tr>
<td>• Intelligence led enforcement</td>
</tr>
<tr>
<td>• Penalties should be more than cash of compliance</td>
</tr>
<tr>
<td>• Ban older vehicles [&lt;euros] over next ten years</td>
</tr>
<tr>
<td>• Creating a level structure for compliance is not ...</td>
</tr>
<tr>
<td>• Register of NCRs of all operators</td>
</tr>
<tr>
<td>• More frequent audits of annual inspect</td>
</tr>
<tr>
<td>• Lose right to self-inspect</td>
</tr>
<tr>
<td>• Broder range of sanctions available to Main Roads</td>
</tr>
<tr>
<td>• Suspension for breaches in AMMS</td>
</tr>
<tr>
<td>• More accredited compliance officers on the road</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>How could risk levels be determined under the WAHVA scheme?</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Gold/Silver/Bronze rating based on compliance check and published openly</td>
</tr>
<tr>
<td>• Skill of company, skill of employees [less = risk]</td>
</tr>
<tr>
<td>• Assessment if infringements - random audits, scheduled audits</td>
</tr>
<tr>
<td>• Dangerous goods and traffic volumes on roads used</td>
</tr>
<tr>
<td>• Emissions: noise, pollution</td>
</tr>
<tr>
<td>• Serious non conformance not cancelled</td>
</tr>
<tr>
<td>• Made public</td>
</tr>
<tr>
<td>• Size of vehicle – perception of public on key roads</td>
</tr>
<tr>
<td>• Risk profiling</td>
</tr>
</tbody>
</table>
A3

Stakeholder Interviews
Stakeholder Interviews
Operator

Main Roads are easy to work with.

4 modules are very basic – uses them as starting point.

PBS scheme:
• Plan to replace all trucks with the new ones with PBS.
• PBS scheme is the best scheme in the country.
• Main Roads should run a PBS campaign.
• Local government sees PBS as an opportunity to raise taxes.
• Main Roads should try to deal with local government, aim for more sustainability.

Access in the regions is inconsistent (local offices).

Qube invests in technology and fitness programs, cause they correlate with safety overall.

There are lots of medical issues:
• Are drivers medical sufficient?
• Who can actual give medical permissions?
• Diabetes as one of the reasons of fatality cases (black outs).

Although is happy with current audit regime. Streamline audit process – there is opportunity for optimization. Incentives may be implemented through audits financials and audits frequency.

To support R&D (hub around transport technology) MR should invest in it (10-20 mln a year). New technologies will provide opportunities in WA.

Bridges meaningful report, give more responsibility to operators to analyse results of the report (it’s about self-compliance).
Stakeholder Interviews
Operator

MR became much more efficient.

Permitting process lead time is one of issues, it could take up to 3 months to get permit.
Permitting process itself is reasonably simple.

Could lose contact due to the long approval of permit.
Operators who do not get approvals (although they have to) win contracts.
Can't compete with low quality operators.

There is no difference between vehicles with dangerous good and other vehicles.

The system doesn't motivate to report on a bad behaviour on the roads.
Small businesses slip under the radar.

Documents were developed many years ago. “Game changed but rules didn't”.

Audit regime is pretty good. It should be taken annually as it is right now. Some incentives such as simpler audits could be implemented.
There are difference on the opinion on audits depend on auditor. Auditors need some additional education.

As well as police and road inspectors need to be educated about the scheme. The do not understand scheme and meaning of different sections.

Drugs and alcohol section doesn't need to be included into the scheme. There are no tools to check drugs yet.

Electronic diaries is a good way to compliance with fatigue module.
Technology is already implemented by some operators it should be used by Government.
Stakeholder Interviews
Operator

Overall scheme is good, many things changed in the last 5 years. Bypass would be a great thing to implement, would allow to reduce fleet.

There should be some credits for operators who use PBS and invest in IT. Access to better routes could be provided for the 1-tier operators.

Alcohol and drug sections should be in the scheme and random testing should take place. Toll is testing its drivers in depo. Gap in testing in multi-day run. Implementation of technology tool would help.

All of the industry is going into electronic forms. Scheme should be able to accept new technology.

Incentives is a good way to support technology and stability.

Questions are on the hours and depth of audit. It would be better to implement risk-based approach. Usually audit has no much value, it’s just ‘tick of the box’.

Had a triggered audit two years ago due to roll-over. Never had random audit.

Helpful for operators would be information from MR regarding roads quality (where to slow down), current maintenance status (repair schedule).
Stakeholder Interviews
Representative Body

Overall WAHVA scheme is pretty good.
Quality of audits is one of the main issues.
For accreditation MR should develop a portal and implement education process for operators.
Threshold should be lowered, the most dangerous vehicles are lighter than 42.5 tonnes.
Audits aren't sufficient, auditors should have a diploma to perform WAHVA audits, as well as for medical there should be certified medics
Local quality of audit differs.
Process is linear, where is the evidence of corrective actions?
It's easy to pass an audit with the right auditor.
Sometimes it takes up to 3 years to get an evidence of corrective actions.
Audit process is flawed – when operator engage auditors, their become the clients of operators and are paid for the good results.
There is no physical audit standard of audit.
There should be an audit risk-based approach.
License should be a privilege.

The question is – what operator should to improve the standards?
How to motivate operators to invest in safety and quality?
There should be alignment between productivity and safety,
Operators with high quality and safety level should be rewarded.
80% of HV movements are undertaken by 14 operators, 20% - by 93 operators.
Raising a quality standard is not a bad thing.

There is no reaction from MR on roll-overs happened on the WA roads.
There should be a safety campaign in WA.
Drivers should be rewarded for no accidents.
Drugs and alcohol should be implemented into the standards.
Real question is fatigue on the road. Officers can't check drivers on the road.
Fatigue module needs to be reviewed. Fitness is where we need to focus on.
Vehicles vibration contribute to fatigue.
In the new standards that are coming out – employee wellbeing should be in place.
When you put technology in place, you need to be transparent.
We are still working on yesterday technologies. We need to embrace new technologies.
Also there is a need to work on industry and government's ethics and mindset.
Stakeholder Interviews
Representative body

There are two aspects of the impact on WA roads:
1. Short-term impact on infrastructure.
2. Volume-based (long-term) impact.

No one monitors the data – how often roads are being used. No one monitors roads capacity. There is a need to find a solution to control it. There were several cases when roads broke up. IT system that controls vehicles and their load (‘mass location type device’) could be a solution in the case.

Permitting process and local government are not related, don’t share data, have no information about each other. Local government usually can control local miners, but not the operators / vehicles whose traffic routes go through several regions.

Too many documents within the WAHVA scheme, it’s easy to get lost in details. HVA systems has too many categories, looks really complicated. For local engineer is to hard to deal with it.

WALGA had to combine MR standards into one document to explain the concept. All of the current policies are confusing people, they don’t need more policies.

There should be an alignment of incentives.

Current management control systems are from 70s-80s.

Sometimes its hard to get clear answers from MR.

There are no positive stories regarding non-compliance cases.

Local government ask for list of conditions from MR. MR needs to review all conditions, especially to low volume roads.
Stakeholder Interviews
Representative Body

Threshold should be lowered. There are many cases of dangerous behaviour on the roads from the vehicles lighter than 42.5 tonnes.

There should be broader various of sanctions. Current situation is that there are no sanctions for poor performance. For example, carrier went off the road and had a roll-over accident. He hadn't been punished, had no sanctions or reflections on the insurance. Breaching permits requirements should reflect on accreditation.

No statistics what's happening on the roads.

MR should run merit-based approach, including risk-based approach. Information about operators (such as categories) should be accessible to officers.

Reporting about the incidents system doesn't work. No one wants to fill in the form and get no response regarding one. There is no point making a complaint to MR. Credibility of the scheme is an issue now.

There should be recognition of WA WAHVA scheme from other schemes (National). It would ease crossing the boarders process for operators. Operator won't need to stop an restart fatigue records of the trip.

Alcohol and drug section is already in the fatigue module, there is no need to add more to that. It is usually the first thing that is checked by the police. Fitness for duty is an issue.

Technology development would reflect on the industry – it’s a push back for small operators. The biggest fear that technology (data) would be used against the industry. The biggest questions – who's going to get benefits from the technology and how is going to be used?

Operators evolve but still working with the system that was constructed many years ago.

There is lack of experience in MR regarding operators everyday work. Lack of understanding how accreditation scheme affects the industry.

HV industry consultative group should not include auditors.

Audit regime:
- On road enforcement records should be linked to the audit results.
- Auditors should have a list of vehicles so no one would go under the radar.
- All indents should be investigated by MR.
- Check of auditors not sufficient enough.
- Re-entry audit time is an issue. Why should it be taken just within 6 months time slot?

Operators should lose their rights to self inspect maintenance or get incentives on case of 3rd party involvement.

The scheme should motivate continuous improvement.
Stakeholder Interviews
Representative body

The system is working.

Audit regime in particular creates lot of work.

Drug and alcohol section could be included in the scheme.

The biggest issue for FIF is permitting process. For example, it took 11 months for one of the contractor to get an approval. It is basically a road ownership issue. It takes lot of time to get an approval from the local government.
Stakeholder Interviews

Representative body

Doesn't have direct relationship with the scheme.

Based on the Road Transport association feedback the scheme should be more concentrated in safety, be more professional. Electronic diaries will help to upgrade the safety.

Operators already use technology and are ahead of the government in the area.

There is an example of scheme change in the Port area near Melbourne. For specific area association of stakeholders came up with local scheme for the suburb that provides incentives for operators who meet safety, pollution and noise criteria.

If the scheme would encourage operators to meet safety criteria – it will help regenerate the fleet of WA. Incentives should motivate operators for better behaviour.

There is a need to move to more data-driven solutions. Implementation and acceptance of e-dairies will get support from the industry. E-dairies should cover fatigue system. The government should have capacity and capabilities to manage the data and technology.

How the data will be used is the main question. It should be used not for penalties but to encourage operators to align with the scheme.

As for documents, business rules for example – long and not transparent. The question with documents is how to them really accessible. Accreditation web-page should be more useable.

In long-term period threshold should be lowered. It would manage the overall industry image.

There are no vehicle inspections that reflect on the industry. Fatigue has been disjoint for years. Policemen don't have any power to do anything with fatigue. They should be able to check drivers.

Risk-based approach should be implemented, while building the flexible scheme. Government need to be in a position they can respond to the industry.
Stakeholder Interviews
Representative body

Biggest issue – lack of communication within agencies and departments. 
Over the last 7-9 years there has been a substantial shift with the scheme but still optimization is needed.

Overall industry is going through tough times, but association is feeling good. Although some certainty on the Federal level might help.

One of the issues of the scheme is permitting process and costs it brings. Disconnection between MR and local government extends the process lead time. It takes 48 hours to approve permit by MR and up to 6 weeks to get approval from the local government. It’s being explained as “costs of doing business” to operators.

Optimizations could be implemented in permitting process such as simplify re-application of permits (roots that has been already approved) and incentives on getting permits for compliance operators (top-tier).

Application for permit should be requested once by operator eliminating the need of applying for the same permit through different agencies several times. Electronic application would simplify the process for operators and in return will allow government gather data from operators.

MR is held back with paper work.

There are accidents on the roads but they are not well published.

Recognising national scheme could be a good thing only if it will work both ways – national scheme would recognize WA scheme.
It will help to get more operators under the radar – we don’t know how many trucks without WA accreditation are within WA border.

Drug and alcohol section is already in the fatigue management module. Responsibility focus of it could be changed from companies to truck drivers.

As an auditors, repairers should be certified for WAHVA scheme. Operators should not be able to check their own trucks.

Web-site should be more user-friendly and include mobile version.
Stakeholder Interviews

Representative body

Audit system needs to be more triggered and bring consequences for auditors (for not doing things right).
Resources is the biggest problem for MR.

Coordination with other agencies is pretty messy.

System should contain more physical checks with inspectors, which could be part of the audit regime.

Roadworthiness do not have any physical truth (especially small operators).

Fatigue needs to be monitored. Current records don't fix the problem and usually are made after the trip.
Technology implementation could help with and be able to catch cheating (e-dairies).
There should be better recording of small incidents as well.
Facilities, stops, and rest areas should be part of fatigue module.

Permit systems should be aligned with configuration not with the length.

As drivers get older through the industry - medicals could be an issue. They fill that they have been attacked by medicals.

Incidents could also happen due to lack of drives qualification. How to deal with it?
There's not enough education for drivers. Drivers should know in addition to driver qualification how to work with cameras, electronic equipment. TWA started education program in schools.
It's getting harder to attract new drivers in the industry.

People are forced to drive more and perform trips quicker. Sometimes it's not the drivers problem, but an operator company. It's always out there when companies force drivers to breach legislation.
Stakeholder Interviews
Representative body

HVA scheme requires lots of paper work and doesn't really improve the safety.

One-size scheme should be different for agricultural industry, cause vehicles are being used for very short period of time. Most of the trucks are seasonally used.

WA farmers conducted internal survey several weeks ago. Two main points from the survey:
1. There should be more flexibility in regulation
2. Very positive experience with auditors

Fatigue and Mass modules do not lean to safety.

Records should be made in electronic form. It could be optional, but its easier to use technologies not for the records only but for audits as well.

Tier accreditation system should also be aligned with km. per truck (threshold). There should be difference in the scheme depend on the km.

For agricultural drivers there could be only entry and re-entry audits, without compliance audits. Drivers are “treated as criminals”.

Lack of communication between agencies, different we-sites, no general location where all of the information could be. More friendly-user WAHVA web-site can make a difference. Lot of people don’t know what exists there.

Alcohol and drugs should not be a part of agricultural industry. Creating more compliance and more paper work won’t increase the safety.

There are no problems with audit regime or auditors. Audits should be more electronic-based. There should be a training for operators how to deal with electronic recording/audits.

National scheme should not be taken into account, it won’t fit WA purpose.

WA scheme is getting worse with all of the bureaucracy. Legislation doesn’t fit the agricultural industry. Government doesn’t understand how the industry works. Agricultural drivers are being pushed to operate illegally. For example, permits system is not practical.
Auditor

Paper work is the biggest issue for the audit regime. Also different version of records do not help auditors to perform their work.

Right now operators need to fill in form for every load which provides just more paper work. Data are not sufficient with this approach.

Standards were developed 20 years ago and nothing has changed since. Documents should be reviewed.

Process is not transparent and lots of documents lead to the current lack of understanding the scheme (small operators).

Audit regime is insufficient – different auditors give different instructions. For example, during random audit auditor didn't find any incompliances, and one week after another auditor found several incompliances during annual audit.

Other schemes should not be taken into account. They won't fit the WA purposes.

Auditors should be checked by MR, bot Global Exampler. Trained people should do that. Also there is lack of training for auditors. MR promised a training/workshop in 2017 but nothing happened since.

One size fits-it-all scheme doesn't work.
Stakeholder Interviews
Auditor

Both work in the business since 1990s. Work mainly with WA WAHVA scheme.

Work both with large and small operators.

One of the main issues of the scheme that various businesses trying to fit into one scheme. Audit regime is associated with enormous amount of documentation.

Scheme is really paper-based. MR doesn't accept electronic data which would optimize the current situation and provide better quality data. Safe objective of the scheme is lost sometimes due to low quality data and too many paper based work.

Auditors have to audit an operator physically, but in some cases it doesn't make any sense, cause it is just checking records and documents but with additional cost for operator (so auditor would be able to come).

There is no difference in documents for different operators. Scheme doesn't work for smell operators who use their trucks once a year. It is physically impossible to check trucks everyday for them.

Another issue that operators check roadworthiness by themselves. It should be checked by 3rd parties.

Right now operators are being checked regarding criteria included in modules. Problem with that not everyone will fit this criteria. But it provides an opportunity to some auditors to find incompliances.

Audit quality is differ depends on auditor. One of the reasons is that auditors don't have mechanic experience. Practical experience is really important both for auditors and Main Roads.

Dimension and Load module is a waste of time cause operators just check the boxes and do not provide any usable data.

Incentives would be forth to implement such as less paper work ir just simple audit checks. Audits should be taken annually as it is.

New reporting of incidents within 48 hours system wasn't communicated to the industry. No one knows about it (1 out of 11 operators). And it just add paper work to the system so operators won't report to MR anyway.

Other schemes shouldn't be taken into account cause they won't fit the WA purposes.

Auditors should be checked by MR cause current Global Exampler doing nothing with the quality.
There is a need in additional trainings for auditors.
Stakeholder Interviews
Auditor

Biggest problem not operators, but auditors and low quality of audit. Especially big problem with auditors who started to work before 2003 year (before MR modules form 2003 class. They should be conducted by high quality auditors and standards).

Recently has done 20 random audits, 17 of them failed due to lack of policies and procedures. Auditors do not understand difference between procedure and process. Interpretation of criteria is different.

Risk-based audit could be implemented but should be high quality.

Current MR documentation does create a confusion. Policies do not have procedures in it. Documents need to be clear as a guide of operators. Modules and criteria contradict with each other.

MR should provide trainings for auditors, teach them how to mentor operators. MR had several sessions regarding AMMS but they weren't really effective, few understood it.

National schemes should not be recognized. Red tape, delays is worth there than in WA scheme.

Auditors should be checked by MR. Global Exampler isn't effective, it doesn't do anything.

There should be standard scheme of communication between auditors, MR and operators. Sometimes auditors send results to operator, sometimes to MR (to avoid negativity from the client).

In the current fatigue regime too much of interpretation, there should be fatigue sheets.

Small operators usually don't have problems with maintenance module, it's an issue with big operators. Scheme should lower the threshold down to 8 tonnes.
HVA scheme full time country-based auditor. 99.9% of work is related to WAHVA scheme. Work requires lot of travel. He manages the current demand for audit due to 90 days window stated in the MR standards.

MR should not recognise other accreditation schemes. National scheme is less flexible – after 2 successful audits the operator should change an auditor. WAHVA scheme fits the purpose of WA and national doesn't fit the special WA needs.

Consultation with other auditors is missing.

Communication schemes could be enhanced. Recent letters from Mark Hamilton is a positive shift.

Website of MR is not user-friendly. Website and documents are not in the language that lots of operators can understand (20-30% operators are farmers).

MR should demonstrate statistics and results of the scheme such as decreased number of incidents.

Mass management module is the most difficult. It's hard to get consistent answers regarding this module from MR.

Recording from the drivers (drivers diary) can be presented in any form, which is inconsistent an issue for auditors. Great amount of paper work in needed according to the current scheme.

Auditors work in the systems that are not compliant, but were approved by MR. This systems can't demonstrate compliance to WAHVA scheme. There are many non-compliant vehicles on WA roads.

Some auditors in WA avoiding specific parts of WAHVA scheme. They are driven by very loose standards of work.

Lack of training for auditors.

MR are not impose penalty on auditors. There should more discipline in MR while working with auditors.
Stakeholder Interviews
Auditor

Intend and direction of WAHVA scheme is good. But operators don't know what to do with it.
Website is unfriendly.
MR presumes that everyone has a computer.
Operators see WAHVA scheme as a burden, just another level of bureaucracy.
Big trucks are soft target.

Modules:
• Maintenance module is the most trouble-free.
• Fatigue module – no one likes it. Still it's an important one, especially medical part. Medicals should be attached to the drivers license. There should be mandatory fatigue training for all drivers in WA, cause fatigue is a major issue in accidents.
• Loading and dimension module is annoying to people.
• Mass management module is the most problematic. It's hard to justify the module from auditors point of view.

Roadworthiness form is terrible. Auditors should be working with their own forms.
Operators guide is very confusing for operators, it's very massive and formal document.
Different ways of recording time, evidence, etc. It would be easier to make it one form like on East Cost.

There is lot's of paper work within the scheme, but just paper work is no evidence for auditors, it can't really prove what's happening.

Some auditors on the market sell additional unnecessary things to operators and audit them later. No one's doing anything to this auditors.

Random audits system doesn't really works. It is the same audits as the annual ones. It should check annual audits and auditors work.
MR doesn't really check auditors.

Answers from MR are inconsistent.
It is not clear when to involve operators in conversations (e-mails), usually they see only negative information in discussions between auditors and MR.

Exampler Global is useless, auditors get nothing from it.

Auditors don't get together with auditors which could be really helpful.

Communication with MR is an issue.
Auditors have nothing – rare conferences, no trainings. There should be mandatory development events.

Industry trend – everyone is expecting the scheme to come down to lower tonnage.
Compromise should be included into the scheme. Scheme should be more about guidelines at it was developed not the mandatory criteria. One size fits-all doesn't work.

Auditors should help operators with the scheme, be their mentors rather than policemen. There should be high quality system not a bunch of criteria.

Scheme is an issue for operators who use their vehicles during just one week per year.

There should be some flexibility implemented in the system.

MR tighten up with criteria with low quality audit system. There is lack of control of auditors. There is competition between auditors who can find more incompliances. Standards should be aiming the safety not criteria themselves.

Panel should invite members with industry experience.

There is need to continuous improvement program. Quality system should ensure that everyone's doing the same.

The procedures should be developed around what operators do on the road.

Regarding drug and alcohol inclusion in the scheme – there is no need to develop another document. Current policy may be just strengthen with it.

Fitness work should be tighten a bit. MR should improve check of compliance to fatigue module.

MR need to change their paper based approach and focus on technology more.

There has to be a regime with sanctions toward operators who are not compliant. For serious
Stakeholder Interviews
Auditor

Started to work with WA WAHVA scheme 2 years ago. Member of the panel contractor list that perform random audits. Recently developed 2-day training for operators – how to interpret WAHVA scheme.

First issue of the scheme is that MR cut FTE's but didn't cut the amount of work. There could be more things in writing to help understand the scheme.

One of the issues – duplication of medicals. Operator has to provide medicals to MR, DoT, for dangerous goods, and for commercial driver category. Information within mentioned medicals duplicates. Data sharing and its consolidation from different agencies is an issue.

There is a problem of inconsistent audit reports. Auditors interpret documentation in different ways. Auditors don't spend much time during audit cause their pricing is rather cheap and they try to deal with the work the quickest way possible.

The Global Exampler is getting more involved recently but still not enough. Auditors have to be reviewed more carefully. Many auditors don't have any practical experience and don't understand the industry. MR don't have enough resources to check auditors, potentially they could do that together with the Exampler.

Operator Guide is just a starting point for operators.

There is are lack of consequences for non-compliance behaviour – both for auditors and operators. MR should cancel accreditation and provide feedback to the industry.

There is an issue with lack of trainings for operators and auditors. MR used to facilitate 1-week training for auditors which was really helpful. Buddy/mentoring system could be implemented for auditors.

Incentives would be a good thing for the industry. Based on a number of corrective actions there should be a ranking system for operators which will influence insurance and costs. Incentives such as costs of registration or free permits would be a good deal. Reducing number of audits won't work, it will reflect on operators quality in a negative way.

Technology would help to control fatigue (using data from tablets). But prior the technology implementation there should be a clear understanding how data is going to be monitored. Regulation should be updated in the mentioned case.

Audit reports could be electronic as well with mandatory fields to be filled. The audit report form should be reviewed – information such as corrective actions duplicates within one form.

Mind set of the industry should start to change from paper-based work to more technology-based.

Another issue is that operator could work with one auditor for many years. It reflects on the audit quality.
Stakeholder Interviews
Auditor

Over 30 years of experience, works with WAHVA accreditation scheme only and with large operators.

The biggest problem is that auditors have to go to operators to conduct an audit and it just add additional cost to operator to bring auditor. It would be much easier if an operator (with more than 2 vehicles) could come to the auditor.

Overall scheme is good and bring the results as safety increase, especially in fatigue area. Although, acceptance of the technology might help. Major operators are using technology such as electronic diaries already and it could be used within the scheme as well.

Communication overall is fine, helpdesk and Mark Hamilton answer all the questions and answers usually consistent and helpful. Herewith the web-site is difficult to handle and find necessary information. Operators are not able to find information they need and call auditor for help.

Implementation of incentives would be great for the scheme and operator’s motivation to participate in the scheme. Incentives such as cost reduce would help a lot.

Other schemes should not be considered for WA cause WA is very different even form the rest of Australia and it just won’t work.

There is no need in independent “Panel Contract of Auditors”. It won’t bring any additional improvements to the current scheme.

Auditors could be checked by 3rd party but the quality could be better. Especially there’s lack of trainings for auditors. Several years ago MR facilitated 2-days training and it was very helpful. Trainings program would help a lot.
Stakeholder Interviews

Auditor

Auditor for 6 years, in transport industry for 20 years. Conduct entry, re-entry and compliance audits.

HVA scheme is more about paper work and doesn't really improve the safety. WAHVA scheme doesn't fit it's main purpose.

Grey area is medicals. There should be a list in procedures regrading what kind of medicals MR accept.

Fatigue management training should have an expiry date and reviewed. Now it's driver fatigue and admin fatigue that are basically the same.

MI1 certificate should be excepted as roadworthy certificate for new vehicles. MR used to accept it.

There is inconsistency on many questions in MR audit department. For example, if single operator expand it's business, there is no single answer from MR if operators should get a new entry audit or not.

Random audits do not have consistency as well. It would be helpful if MR would help to facilitate auditors meetings / forums once a year.

Another issue is that auditors have to inspect every single depo (especially for bug operators) and be there physically. For example, big operators already have all of the information in electronic version so there is no need to inspect all of the depos.

One-size fits it all scheme doesn't really work, especially for small operators. For example, training records are not really relevant for single operators.

Regarding the communication with MR, it would be nice to have more contacts and info available for auditors. Email with major changes in not enough.
Stakeholder Interviews
Government agency

The WAHVA scheme became a burden, covered in paperwork. Compliance doesn’t match the performance.

Adding drug and alcohol to the current scheme would lead to double the paper work that would repat the current legislation. Manual paper based work should be minimized.

National scheme repeated in WA scheme. There could be an exemptions for the operators that have national accreditation already. Scheme should also control noise and pollution. Autonomous vehicles should be promoted.

Monitoring the process should not be the barrier. New technologies should be implemented in the scheme so MR won’t have to rewrite it annually.

80% of work is performed by 20% of operators.

Scheme needs to be publically communicated. MR and police should share data. Info from inspectors should be put in a system.

Permitting system is not efficient. There is no effective system that would verify the load. 40% of vehicles overloaded. Check the load would be less expensive than maintain the roads.

There should be a system (similar to Uber) that could monitor operators with reference to the operators rating.

Within the agencies there’s no clear responsibilities alignment.

1. The Accreditation primary safety role with respect to all parties must be to deliver risk-based guidance, compliance and enforcement against the provisions of the law. Agencies should have a formulated approach for audits and report on exceptions. The third party auditing purely an administration tool and not information is not used to improve the system. It become a tick and flick exercise and doesn’t add any value to road safety, no correlation between what is happening on the road and what is documented within the system. Industry sees that administration burden.

Accreditation scheme participation should confirm that a business complies with the law and has best-practice safety systems, with customers able to rely on current accreditation certificate when they do their due diligence on a trucking business. Customers should not need to undertake their own audits except on specific issues not covered by the accreditation scheme.

2. As a way of further encouraging accreditation, regulatory concessions should be available to all operators who meet accreditation standards, regardless of the scheme they are in. To minimize the cost of accreditation to operators, there should be arrangements between WAHVA and other accreditation schemes. WAHVA already stipulated in their business rules that they can recognise and other accreditation modules that this is rarely communicated with the industry and the NHVR. Common standards already exists nationally. Medlock report on the harmonization of accreditation systems is an important report to know.

3. As WAHVA covers RAV’s, they are determined to by commercial vehicles under the Worksafe legislation. Worksafe already has a number of Drug and Alcohol requirements as part of the employers and employee responsibility that doesn’t need replication. This can be referred in the driver competency verification requirements in assessing fitness to drive.

4. Technology can be used to minimize the administration burden for operators and minimize the amount of manual audits that are conducted. Adopting technology.

5. Compliance doesn’t analyse or report on the safety performance and there is no correlation for a compliance and enforcement plan to target non compliant operators. As a result of that there is no way for the agency to understand if the system is working and no way of identifying if the system requires improvement to achieve a safe system approach.
Stakeholder Interviews

Government agency

Limited interactions with the scheme from DoT

The WAHVA scheme has always been a paper-based scheme and cumbersome as a result

DoT Direct is used by Main Roads to understand licencing status – better coordination of driver competency could be enabled

The Driver and Vehicle Services manually amend licencing applications from operators

“We should share greater amount of information and drive better connectivity and analytics. This should be a portfolio-wide capability”

Need to transfer towards real-time and mobile-enabled data gathering

Barriers to data sharing include the requirements to amend privacy restrictions under RTAA (2001) and RT Administration Act

Would favour harmonisation to ensure national consistency

Fees associated with the scheme have never been subject to a CPI increase, as the initial implementation was very controversial.

Systems/hardware/software should allow for interoperability between data users/owners. This should continually be analysed for potential/future users of this data.

Any technology improvements should not be undertaken in isolation. Greater access to TRELLIS (DoT system) could reduce manual checks and data entry by departmental personnel

DoT cannot currently provide the status of drivers license to employers (including demerit points). This would require a change to the RT Administration Act. (note. Queensland currently have this capacity to allow drivers to provide access to employers)
Worksafe is responsible for Fatigue management regulation only. There are no strict guidelines that regulate how MR, Worksafe, Police and MR work together and share responsibilities.

In alignment with MR, Police, and DoT, Worksafe could organise road stops for drivers. Road stops is a way to examine vehicle. Worksafe doesn't have powers to stop vehicles, only the power to conduct an inspection.

Under 43 section of regulation act Worksafe can't share information of non-compliance behaviour of operator with other agencies including MR. M-R doesn't see the whole picture during audit checks.

Worksafe gather information regarding non-compliance with fatigue management through:
1. Call-centre
2. Road checks
3. Main Roads

Operator could get a probation notice and follow-up visits conducted by Worksafe.

People who call in the call-centre can get feedback if they leave name and number, but usually people refuse to do that.

3rd party auditors that work with the same operators for many years effect integrity of the audit process. Auditors are not all on the same page, they have different information and interpret it differently.

For example, auditors do not check non-work time operators' records (usually check just 2 concepts out of 3).

Paper-based records are not sufficient, they don't show real situation on the road. Technology should be implemented, but areas of manipulation with electronic data should be eliminated.

Electronic diaries usage would be a good decision and will help to show more information and evidence on what's happening on the roads.

Self-insured companies (over 100 companies) are out of the Worksafe's radar. Worksafe is not able to 'touch' them.

Resuming, there are 2 main issues that could be resolved for the WAHVA scheme:
1. Worksafe can't share information with MR
2. Auditors should be checked in more sufficient way

The WAHVA scheme is consequences-free at the moment. If you tick right boxes you could get an accreditation.