



Public Service Association of NSW

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In reply please quote: JM:

19 August 2021

Mr Brett Patterson
Director
Heavy Vehicle Safety and Compliance
Transport for NSW

email: Brett.PATTERSON@transport.nsw.gov.au

Dear Mr Patterson,

I refer to your letter dated 16 August 2021 and the agreement in the IRC settling the Association's work bans. The Association has worked with our delegates and developed the below proposals that would assist minimise contact with heavy vehicle drivers and in turn provide a safe system of work.

HVIS

1. With no guarantee of vehicles from declared areas remaining in, or close to, their declared area it is more important that measures are taken to reduce the risk contact with heavy vehicle drivers poses.

While surveillance testing does not eliminate risk, it reduces the risk of an individual being in the community whilst infectious. As such, we believe 'customers' entering your premises should be asked if they have complied with the Public Health Orders (PHO). This may not be required under the PHO; however, entrants to your premise should be asked to provide proof as a WHS measure. This can be undertaken in various ways:

- a. communication is put on your website that this is a measure you will be taking; and/or
 - b. you make contact with all your bookings to advise they will need to evidence they are complying with PHO; and/or
 - c. similar to other government sites, you have a COVID – 19 marshal ensuring compliance.
2. We understand that WHS Committee remains concerned the risk of truck drivers remaining in their cabin poses as it has resulted in more individuals then walking around the pit. The SWMS have cited masks and Perspex glass to protect the COIs, and therefore, the risk posed by locking the door was greater. Has a risk assessment has been undertaken for both these scenarios? Further, were there other measures considered to mitigate this without having drivers entering an enclosed space?

Studies have shown that the delta variant can linger in areolised form for up to 16 hours in an enclosed space. A Perspex glass is not going to prevent that. Also, there is no guarantee that a driver will be wearing a mask, or wearing it properly when in the space. To prevent drivers from entering the office appears to be the safest

option. Below are measures that can be implemented to reduce the number of individuals walking around the pit as a result of having the door locked:

- a. QR code is provided to the COIs to take with them. This can then be provided to the Driver if they have not scanned in; or
- b. Preference is like other government sites with the general public coming onto their premises. They have a COVID – 19 marshal that ensures the drivers QR code in and can confirm what vehicle they are in, their appointment time, and then call the COI for the inspection to be undertaken. The Driver is then instructed to go to their cabin and remain in the cabin.

We understand this is a site by site assessment and urge this is undertaken urgently.

3. Drivers whose address is greater Sydney should not be undertaking their HVIS inspection in regional NSW. As we know, regional NSW is now also in lockdown due to the spread. As a government agency you should be working with Government policy to prevent mobility. The direction should be provided that should not be attending these sites.
4. SWMS states not to enter cabins; however, you have an inspection of coaches and buses, including those involved in airport transfer. The preference is not to have this occur. If COIs remain to enter the cabins, we propose all bus and coach companies within any declared area produce a certificate/statutory declaration certifying that a bus or coach has been internally cleaned before HVIS inspection.
5. HVIS inspection sites it should be mandatory to wear a mask. Not only are drivers required to talk into a TfNSW radio, you have then currently come into enclosed spaces.
6. All inspections require talking to the Driver. We want to see this as contactless as possible:
 - a. there should be two people for each inspection would mean the Driver is not required to talk into a radio or utilise a phone; or
 - b. there is a way to communicate with the Driver that does not require close contact e.g. use of phones on hands-free, tapping into a frequency on a radio if the communication only needs to be one way?
7. Where a driver arrives for a HVIS inspection with flu-like symptoms the inspection is to be terminated.
8. Has WHS committee assessed every HVIS site to assess what parts of the workflow can be undertaken without contact?

HVSS

1. Assurances that the adjustments to templates is reducing the number of minor breaches that flag vehicles into safety stations. We are advised anecdotally there has been no reduction in the number of breaches.
2. Speed limiter Downloads and non-essential alerts do not need to occur at HVSS. We are aware some sites no longer are doing downloads however we are advised there are managers at some sites still instructing COI's to do this task which requires them to get into the cabin.

3. Touching of Driver's possessions is not required. To touch their possession may result in getting close to the Driver. It is unnecessary and the Driver can be asked for their license number. Rather than touching log books you are to the following EO-PR-016 Fatigue Check Procedure 3. Fatigue Assessment 3.1. Assessing if a driver is impaired by Fatigue.

Road side enforcement

1. Still have employees coming into declared areas to get vehicles. Home garaging is to be permitted. A general statement of when practicable is insufficient and provides no framework for when this will be implemented.
2. When doing road enforcement, you need only pull over infractions of substantial or critical nature. We are happy to discuss any difficulties or how this could be implemented.

General Safety Measures

1. Immediate vaccination's for COIs as you have stated they are required to keep the state moving. This not only reduces the risk of contracting COVID - 19 it reduces the impacts.
2. Any changes in SWMS be communicated more effectively than attachments in an email. An example is regular Livestream to all COI. COI then be allowed to give feedback via Livestream or some other means.

With the number of measures submitted structured discussions between the parties is welcomed. Please contact me at your earliest convenience on 0408 213 339 or via email jmoore@psa.asn.au.

Sincerely,



Jessica Moore
Industrial Officer
for **Stewart Little**
General Secretary