

Driving Instructor Safety

Business Name:		ABN:	
Business Address:			
Contact Person:	Phone:	Email:	

THIS RISK ASSESSMENT IS APPROVED BY THE PCBU ON THIS PROJECT

Under the Work Health and Safety Regulation (WHS Regulation), a person conducting a business or undertaking (PCBU) is required to ensure that a RISK ASSESSMENT is prepared before the proposed work starts.

Full Name:		
Signature:	Title:	Date:

CLIENT OR PRINCIPAL CONTRACTOR DETAILS

Client:	SCOPE OF WORKS
Project Name:	
Project Address:	
Project Manager:	
Contact Phone:	
Date Risk Assessment supplied to Project Manager:	



RISK MATRIX									
LIKELIHOOD	INSIGNIFICANT	MINOR	MODERATE	MAJOR	CATASTROPHIC	SCORE	ACTION	HIERARCHY OF CONTROLS	
ALMOST CERTAIN	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4 ACUTE			Elimination Remove the hazard.	
LIKELY	2 MODERATE	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4A ACUTE	DO NOT PROCEED	Substitution Replace the hazard.	
POSSIBLE	1 LOW	2 MODERATE	3 HIGH	4 ACUTE	4 ACUTE	3H HIGH	Review before work starts.	Isolation Isolate People from the hazard	
UNLIKELY	1 LOW	1 LOW	2 MODERATE	3 HIGH	4 ACUTE	2M MODERATE	Ensure control measures in place.	Engineering Isolate the hazard	
RARE	1 LOW	1 LOW	2 MODERATE	3 HIGH	3 HIGH	1L LOW	Monitor and keep records.	Administrative Change	
								PPE	

Risk Rating & Required Action:	
4A	Stop work. The risk is intolerable. Eliminate the hazard or redesign the activity before proceeding. A Safe Work Method Statement (SWMS) or higher-level authorisation is required.
3H	Review and approve additional controls before task starts. Senior supervisor sign-off needed.
2M	Ensure all nominated controls are in place and effective. Proceed with caution; monitor conditions.
1L	Proceed, following standard operating procedures. Monitor and keep records.

Consequence Scale:			
Consequence	People (injury/illness)	Project / Assets	Compliance / Reputation
Catastrophic	Fatality or permanent total disability	project shutdown	Significant regulator intervention; criminal prosecution
Major	Serious injury/illness (hospital > 5 days)	critical delay	Improvement notice; major media coverage
Moderate	Medical-treatment injury; lost-time > 1 day	moderate delay	Minor breach; adverse client comment
Minor	First-aid only, no lost time	negligible delay	Isolated non-conformance
Insignificant	No injury	no schedule impact	Deviation caught and corrected on site

Notes on Hierarchy of Controls:
Remember to apply controls in the preferred order shown by the coloured pyramid:

1. **Eliminate**
2. **Substitute**
3. **Isolate**
4. **Engineering**
5. **Administrative**
6. **PPE**

Always document **why** a lower-order control is accepted if elimination or substitution is not reasonably practicable.

aligned with Safe Work Australia's Managing the risk of fatigue at work (2023) and ISO 45001:2018 clauses 6–8.

JOB STEP	POTENTIAL HAZARDS	IR	CONTROL MEASURES	RR
SPECIFIC WORK STEPS	HAZARDS THAT MAY ARISE	INITIAL RISK	SPECIFIC MEASURES TO BE PUT IN PLACE TO ELIMINATE OR CONTROL THE RISKS	RESIDUAL RISK
1. Governance, WHS Duties & Safety Leadership	<ul style="list-style-type: none"> Lack of clear allocation of WHS due diligence responsibilities between business owner, managers and senior instructors Inadequate understanding of PCBU duties under WHS Act 2011 for driving instruction activities conducted in public road environments Insufficient consultation with instructors and administrative staff on health and safety issues No structured system for monitoring legal changes, road rules updates or regulator guidance relevant to driving instruction Commercial pressures prioritising lesson volume and pass rates over safety standards Inadequate incident reporting and investigation framework leading to repeat system failures 	4A	<ul style="list-style-type: none"> Establish a WHS management policy endorsed by senior management outlining commitment to safe driving instruction and compliance with WHS Act 2011 Define and document WHS roles, responsibilities and accountabilities for directors, managers, senior instructors, casual instructors and administration staff Implement a regular WHS governance review (e.g. quarterly) including review of incidents, near misses, traffic infringements and corrective actions Develop a legislative compliance register covering WHS Act 2011, WHS Regulation, road transport legislation and vehicle standards, and assign responsibility for periodic review Establish formal consultation mechanisms (e.g. WHS committee, toolbox meetings, online feedback forms) to periodically address risks in driving lesson operations Implement a documented incident and near-miss reporting, investigation and action tracking procedure including lesson learned communication to all instructors 	3H
2. Instructor Competency, Licensing & Training Systems	<ul style="list-style-type: none"> Instructors operating without appropriate driver or instructor accreditation, endorsements or working with children clearances Insufficient training on hazard perception, defensive driving and managing learner driver errors Inadequate instruction in WHS responsibilities, fatigue management, and dealing with aggressive or at-risk learners Failure to verify and record ongoing professional development and refresher training for instructors No systematic assessment of instructor driving competence following near misses, collisions or complaints 	4A	<ul style="list-style-type: none"> Implement a competency framework specifying minimum qualifications, licences, accreditations and behavioural expectations for all instructors Maintain a central register of instructor licences, driving history checks, working with children checks and expiry dates with automated alerts Provide structured induction training covering WHS duties, safe vehicle operation, emergency procedures, fatigue, distraction and managing learner anxiety Implement annual refresher training and competency assessments including in-vehicle assessment by a senior instructor or external assessor Introduce a performance management procedure linking incidents, traffic infringements and substantiated complaints to targeted retraining or suspension of duties Require all contractors and franchisees to meet equivalent documented competency and training requirements as employees 	2M
3. Vehicle Procurement, Design & Safety Specifications	<ul style="list-style-type: none"> Procurement of vehicles without adequate safety features for instructional 	3H	<ul style="list-style-type: none"> Adopt a vehicle procurement policy that mandates minimum 5-star ANCAP rating, dual controls, ESC, ABS, reversing cameras and modern safety technology where practicable 	2M

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	<ul style="list-style-type: none"> work (e.g. no dual controls, low ANCAP rating) Inconsistent vehicle types and control layouts increasing cognitive load and risk for instructors and learners Lack of consideration for accessibility needs of learners with disabilities or different body types Use of private or instructor-owned vehicles that do not meet organisational safety standards Inadequate assessment of fuel type, size and transmission type suitability for training environments 		<ul style="list-style-type: none"> Standardise fleet specifications (e.g. common make/model or control layout) to minimise variability and support consistent training and emergency response by instructors Implement a pre-approval process for any instructor-owned vehicle including inspection against a documented safety checklist Include ergonomic considerations (adjustable seats, steering wheels, clear visibility, climate control) in procurement decisions to reduce strain and distraction Specify vehicle selection criteria to match operating environment (urban, regional, hilly areas) and lesson types (e.g. manual vs automatic) Review vehicle procurement specifications every two years to incorporate improvements in vehicle safety technology and regulatory changes 	
4. Vehicle Inspection, Maintenance & Safety Assurance Systems	<ul style="list-style-type: none"> Inadequate preventative maintenance system resulting in vehicle defects during lessons Reliance on ad-hoc checks by instructors without formal process or training Poor recordkeeping of services, repairs and defect rectification Failure to remove unsafe vehicles from service promptly after defect identification Use of different service providers with inconsistent quality of work or parts No systematic trend analysis of defects or vehicle-related incidents 		<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M
5. Journey Management, Route Planning & Scheduling	<ul style="list-style-type: none"> Unstructured lesson route planning exposing learners and instructors to unnecessarily complex or high-risk environments too early Inadequate consideration of time of day, traffic density, school zones and known crash hot-spots when scheduling lessons 	3H	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M

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	<ul style="list-style-type: none"> Over-scheduling of back-to-back lessons leading to rushed transitions and instructor fatigue Insufficient planning for unfamiliar areas, regional locations or test centres with unique risks No system to restrict driving lessons in extreme weather or poor visibility conditions 		[REDACTED]	
6. Fatigue, Workload & Rostering Management	<ul style="list-style-type: none"> Excessive working hours for instructors, especially when combining instruction with other employment or shift work Insufficient rest breaks between lessons resulting in reduced vigilance and slower reaction times Roster patterns not accounting for peak cognitive load associated with continuous learner supervision Instructors travelling long distances between lessons without adequate travel time Lack of training or awareness on recognising and reporting fatigue Commercial incentives encouraging instructors to ignore fatigue signs 	4A	[REDACTED]	2M
7. Distraction, Mobile Technology & In-Vehicle Systems	<ul style="list-style-type: none"> Reliance on mobile phones, navigation apps or booking systems during lessons creating distraction for instructors In-vehicle technology (screens, infotainment, alerts) diverting learner and instructor attention No clear rules on Bluetooth, hands-free and notification management during instruction Learners attempting to access phones or devices while driving Lack of standard positioning and secure mounting for devices used for navigation or lesson management 	3H	[REDACTED]	1L

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8. Learner Assessment, Behavioural Management & Client Screening	<ul style="list-style-type: none"> Accepting learners with medical, cognitive or behavioural conditions without adequate information or controls Aggressive, abusive or non-compliant learner behaviour creating psychological and physical risk to instructors Failure to identify learners who are intoxicated, drug-affected or unfit to drive at the time of lesson Inadequate process to manage anxious, highly stressed or traumatised learners leading to unsafe driving responses No clear pathway for instructors to decline or terminate unsafe lessons without financial penalties 	4A	[REDACTED]	2M
9. Working with Young People, Lone Work & Personal Security	<ul style="list-style-type: none"> Instructors working alone in confined spaces with minors or vulnerable persons without adequate safeguards Risk of allegations of inappropriate conduct or harassment during one-on-one lessons Pick-ups and drop offs in unsafe locations (isolated areas, poor streets, high-crime areas) Lack of check-in systems when instructors travel to remote or unfamiliar areas No clear process for managing domestic violence situations, stalking or threatening behaviour from third parties 	3H	[REDACTED]	1L
10. Emergency Preparedness, Incident Response & Post-Incident Support	<ul style="list-style-type: none"> Unclear procedures for instructors to follow in the event of a collision, near miss, medical emergency or road rage incident during a lesson Lack of emergency equipment or information (e.g. first aid kits, emergency contacts, insurance details) available in vehicles 	4A	[REDACTED]	2M

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	<ul style="list-style-type: none"> Inadequate psychological support for instructors following traumatising events such as serious crashes or critical incidents Failure to notify regulators or insurers when required, leading to legal and financial exposure No structured process for analysing incidents and implementing system improvements 		[REDACTED]	
11. Information, Communication, Consultation & Recordkeeping	<ul style="list-style-type: none"> Instructors unaware of current policies, procedures or changes to road rules and WHS requirements Poor communication channels between management, instructors and administrative staff, especially for contractors or regional staff Incomplete or inconsistent lesson, incident and maintenance records impeding risk review Failure to capture near misses or instructor concerns due to cumbersome or inaccessible reporting systems 	3H	[REDACTED]	1L
12. Contractor, Franchisee & Third-Party Management	<ul style="list-style-type: none"> Assuming contractors or franchisee instructors manage their own WHS risks without verification Inconsistent safety standards, training and vehicle quality across different third-party providers Lack of clarity on WHS responsibilities between the principal business and contracted instructors Price-driven contracting arrangements that incentivise cost-cutting on safety controls 	3H	[REDACTED]	2M

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13. Manual Handling, Ergonomics & Occupational Health	<ul style="list-style-type: none"> Poor driving posture for instructors due to repeated adjustment between their own and learner seating positions Repetitive strain from frequent control inputs on dual controls and prolonged reaching to steering wheel or dashboard Lifting or moving teaching materials, cones or equipment without guidance Exposure to extremes of temperature in vehicles, contributing to fatigue and discomfort Inadequate management of pre-existing injuries or health conditions for instructors 	3H	[REDACTED]	1L
14. Environmental, Weather & Road Condition Management	<ul style="list-style-type: none"> Driving lessons conducted in severe weather (heavy rain, hail, fog, heatwaves) without appropriate risk assessment Exposure to bushfire smoke, dust or poor air quality during lessons impacting instructor and learner health Unmanaged risks associated with unsealed roads, flood-prone areas, wildlife-prone areas, particularly in regional or remote settings Insufficient procedures for adjusting or cancelling lessons when visibility or road surfaces deteriorate 	3H	[REDACTED]	1L

EMERGENCY RESPONSE – CALL 000 FOR EMERGENCIES

Ensure to have an Emergency Management Plan in place as well as adequate numbers of trained first aid staff with easy access to fully stocked first aid kits, rescue equipment, material safety data sheets, adequate access to emergency communication equipment and fire-fighting equipment suitable for all classes of fire and ignition sources.

LEGISLATIVE REFERENCES

RELEVANT LEGISLATION AND CODES OF PRACTICE. DELETE THE LEGISLATIVE REFERENCES FOR ANY STATE THAT ARE NOT APPLICABLE

Queensland & Australian Capital Territory

Work Health and Safety Act 2011
 Work Health and Safety Regulations 2011
 Legislation QLD: <https://www.worksafe.qld.gov.au/laws-and-compliance/work-health-and-safety-laws>
 Codes of Practice QLD: <https://www.worksafe.qld.gov.au/laws-and-compliance/codes-of-practice>
 Legislation ACT: <https://www.worksafe.act.gov.au/laws-and-compliance/acts-and-regulations>
 Codes of Practice ACT: <https://www.worksafe.act.gov.au/laws-and-compliance/codes-of-practice>

Victoria

Occupational Health and Safety Act 2004
 Occupational Health and Safety Regulations 2017
 Legislation VIC: <https://www.worksafe.vic.gov.au/occupational-health-and-safety-act-and-regulations>
 Codes of Practice VIC: <https://www.worksafe.vic.gov.au/compliance-codes-and-codes-practice>

New South Wales

Work Health and Safety Act 2011
 Work Health and Safety Regulations 2025
 Legislation NSW: <https://www.safework.nsw.gov.au/legal-obligations/legislation>
 Codes of Practice NSW: <https://www.safework.nsw.gov.au/resource-library/list-codes-of-practice>

Western Australia

Work Health and Safety Act 2020
 Work Health and Safety Regulations 2022
 Legislation Western Australia: <https://www.commerce.wa.gov.au/worksafe/legislation>
 Codes of Practice WA: <https://www.commerce.wa.gov.au/worksafe/codes-practice>

Northern Territory

Work Health and Safety (National Uniform Legislation) Act 2011
 Work Health and Safety (National Uniform Legislation) Regulation 2011
 Legislation NT: <https://worksafe.nt.gov.au/laws-and-compliance/workplace-safety-laws>
 Codes of Practice NT: <https://worksafe.nt.gov.au/laws-and-compliance/codes-of-practice>

Safe Work Australia Links

Law and Regulation (All States): <https://www.safeworkaustralia.gov.au/law-and-regulation>
 Model Codes of Practice: <https://www.safeworkaustralia.gov.au/resources-publications/model-codes-of-practice>

South Australia

Work Health and Safety Act 2012 (SA)
 Work Health and Safety Regulations 2012 (SA)
 Legislation for SA: <https://www.safework.sa.gov.au/resources/legislation>
 Codes of Practice for SA: <https://www.safework.sa.gov.au/workplaces/codes-of-practice#COPs>

Model Codes of Practice

- Managing noise and preventing hearing loss at work
- Confined spaces
- Labelling of workplace hazardous chemicals
- Managing risks of hazardous chemicals in the workplace
- Welding processes
- First aid in the workplace
- Managing the risk of falls at workplaces
- Hazardous manual tasks
- Managing the risk of falls in housing construction
- Managing electrical risks in the workplace
- Demolition work
- Excavation work
- Work health and safety consultation, cooperation and coordination
- Managing the work environment and facilities
- How to manage work health and safety risks
- Managing risks of plant in the workplace
- Construction work

Tasmania

Work Health and Safety Act 2012
 Work Health and Safety (Transitional and Consequential Provisions) Act 2012
 Work Health and Safety Regulations 2012
 Work Health and Safety (Transitional) Regulations 2012
 Legislation for TAS: <https://worksafe.tas.gov.au/topics/laws-and-compliance/acts-and-regulations>
 Codes of Practice for TAS: <https://worksafe.tas.gov.au/topics/laws-and-compliance/codes-of-practice>

Details of permits, licenses or access required by regulatory bodies (add or delete as required):

- Permits from local council
- Authorisation to commence work
- Any required documents.