MOTORCYCLE SAFETY IN NSW

Organisation: NSW Chapter of the Australasian College of Road Safety
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8 September 2015

Mr Greg Aplin
Chair
NSW Staysafe Committee
Parliament House
Macquarie Street
Sydney NSW

Dear Sir,

STAYSAFE COMMITTEE INQUIRY - MOTORCYCLE SAFETY IN NSW

On behalf of the NSW Chapter of the Australasian College of Road Safety, I am pleased to submit to you the attached document outlining information that we believe is relevant to the above inquiry.

The NSW Chapter has a broad membership of road safety professionals, researchers and members of the public, as well as other professionals involved in health and community services who all have a keen personal and professional interest in the continued improvement in all matters related to road safety.

Our submission seeks to present to the Inquiry information that is considered relevant to selected areas of the terms of reference. We have not sought to provide the Inquiry with specific recommendations, however, we are prepared to provide further evidence and testimony should the Committee wish to understand further the particular issues raised.

In this regard, please do not hesitate to contact me, Chair of the NSW Chapter, at [Redacted] or care of ARRB Group, PO Box 269 Ultimo NSW 2007. Myself and the other contributing authors to this submission listed would be pleased to meet with the Committee at your convenience.

Yours sincerely

David McTiernan
Chair
NSW Chapter - ACRS
Submission to Staysafe (Joint Standing Committee on Road Safety)

Inquiry into Motorcycle Safety in NSW, 2015

By the Australasian College of Road Safety, NSW Chapter
(Sydney)
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This submission to the NSW Staysafe Inquiry into Motorcycle Safety in NSW, 2015, is approved by the ACRS NSW Chapter Committee.

The views expressed in this submission are those of the authors and are not necessarily representative of the ACRS National Executive or of their respective employer organisations.

Keywords: Staysafe, motorcycle safety, rider training, rider licensing, novice riders, crash risk, protective clothing

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THE AUSTRALASIAN COLLEGE OF ROAD SAFETY

The Australasian College of Road Safety is an association of individuals and organisations from a wide range of disciplines whose work is related directly or indirectly to road safety.

The mission of the ACRS is to improve road safety practices by facilitating the efficient interchange of ideas between stakeholders and encouraging them to take a united approach to road safety.

ACRS members include traffic engineers, road trauma specialists, researchers, enforcement agencies, emergency services, policy makers, industry representatives, motoring organisations, driver trainers and educators, and insurance companies.

ACRS has a package of policy statements on a range of matters, which are available for review at http://acrs.org.au/about-us/policies/.
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1 INTRODUCTION

1.1 The Australasian College of Road Safety

The Australasian College of Road Safety (College) is an incorporated body (Association Number A01903) established in 1988 as an association for people and organisations working in road safety. It is a member based association, with state chapters, coordinated by the national office located in Canberra.

The College currently operates with a chapter in each of the following state/countries:

- Adelaide, South Australia
- Auckland, New Zealand
- Brisbane, Queensland
- Canberra, Australian Capital Territory
- Melbourne, Victoria
- Perth, Western Australia
- Sydney, New South Wales.

The College is the region’s peak membership association for road safety professionals, advocates, and members of the public who are focused on saving lives and serious injuries on our roads. It provides a rich, collaborative environment to promote communication, networking, professionalism and advocacy across all spheres of road safety – including policy, advocacy, research, application and dissemination.

Our current membership includes experts from across all areas of road safety, including policy makers, academics, community organisations, researchers, federal, state and local government agencies, private companies and members of the public.

The NSW ACRS Chapter Committee recognises that motorcycle road safety is a potentially wide ranging topic of discussion as evidenced by the broad scope of the terms of reference for the Inquiry.

In this submission the Chapter has provided analysis of trends and risk factors associated with motorcycle injury and fatality crashes in NSW.

The Chapter has also identified a number of key areas from the terms of reference, where we can best contribute quality, evidence-based information from our collective expertise. The key areas addressed in this submission are:

- Trends in motorcycle usage, injury and fatality in NSW.
- Crash and injury risk factors in NSW motorcycle crashes.
- Unlicensed riders in NSW crashes.
- Rider training and licensing.
- Novice rider exposure and association with crash risk in NSW.
- Increasing the usage of motorcycle protective clothing.
2 TRENDS IN MOTORCYCLE USAGE, INJURY AND FATALITY IN NSW

Reducing the crash and injury risk of motorcycles and scooters depends on the accurate identification of crash factors and exposure. While there is extensive literature on crash factors, there has been less attention to the importance of measures of exposure to define the population at risk.\(^2\) In the following section we present our analysis of trends in crashes, fatalities and injuries relative to the number of registered motorcycles.

In the decade to 2013, the number of motorcycle crashes involving serious injury or fatality in NSW increased 37% and 20% respectively, but the number of registered motorcycles almost doubled. When crash numbers are considered as rates relative to the population at risk, the picture is more encouraging.

Figure 1 illustrates crash rates as the volume of registered motorcycles increased. 2006, crash rates per 10,000 registered motorcycles have decreased 35% for fatal crashes (5.5 to 3.5) and by 31% for serious injury crashes (186.9 to 128.4).

Figure 2.1: Trends in motorcycle registrations and crash rates, per 10,000 registered motorcycles in NSW, 2003 – 2013.

While there is an encouraging picture emerging with respect to the crash numbers involving motorcycle, this is not an indication that action is not required to improve safety for motorcycle road users. Indeed, the NSW Chapter, in this submission, supports more action by the NSW Government, especially since projections show there will be an increasing use of powered two-wheeler style vehicles on NSW roads.

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1 Unless otherwise indicated, the crash factors are drawn from analysis of police reported crash data provided by the NSW Centre for Road Safety, for a report prepared annually for the Motorcycle Council of NSW (MCC) and posted on their website.

2 While kilometres travelled is the most accurate measure, we have used registered vehicles as this is the best currently available measure of exposure for the motorcycling population at risk in NSW. Registered vehicles overestimate the active riding population due to owners with multiple motorcycles, with recent research suggesting that in NSW these account for approximately 15% of registered motorcycles (de Rome et al, 2012).
3 CRASH AND INJURY RISK FACTORS IN NSW MOTORCYCLE CRASHES

3.1 Multi-vehicle crashes
The proportion of motorcycle crashes that involve another vehicle has remained constant for the past 15 years at just over half (58%).

The other vehicle was the key vehicle in 62% of all multi-vehicle crashes with a motorcycle. The majority of multi-vehicle crashes occurred at intersections (58%) and the other vehicle was the key vehicle at 70% of those crashes. Over half of all motorcycle intersection crashes occur at T-junctions (54%) and cross-roads (34%).

Young riders (17-25 years) were more likely to be involved in multi-vehicle crashes than were older riders (40+ years), and were also more likely to be riding the key vehicle.

Rear-end, head-on and overtaking crashes represented 19%, 5%, 2% of all multi-vehicle crashes, respectively, and were those in which the motorcycle was most likely to be the key vehicle. Head-on crashes mostly occur on curves (82%) and were due to the rider crossing or leaning over the centre line while cornering.

3.2 Single vehicle crashes
Single vehicle (motorcycle) crashes account for 42% of fatal and 43% of injury motorcycle crashes.

Single vehicle crashes were almost equally likely to occur on straight (52%) as curved (48%) sections of road.

Road surface hazard such as loose gravel, diesel spill or a pothole were a contributing factor to 20% of all single vehicle crashes overall, with 26% of these crashes on curves and 14% of those on straight sections of road.

More than half (58%) of all single vehicle crashes involving excess speed for conditions were on curves.

Excess speed for conditions was associated with 47% of all single vehicle crashes including 84% of fatal and 47% of injury single vehicle crashes.

3.3 Licence status
The proportion of crashes involving novice riders has increased since 2009, from 10% to 15% for Learners and from 8% to 11% for Provisional riders. However this does not necessarily reflect increased crash risk for novice riders, as changes to the licensing system have occurred over this time, have extended the duration of provisional and learner license holding periods.

Unlicensed riders continue to be over-represented crashes involving high risk riding. Unlicensed riders comprised 7% of all riders who crashed but 19% of those in fatal crashes.

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3 The key vehicle is based on the Road User Movement (RUM) Code, which describes the movement that resulted in the first impact. The key vehicle is usually, but is not necessarily legally at fault. For example a vehicle turning across the path of another will always be defined as the key vehicle, even if they had right-of-way (e.g. green light arrow).
and 35% of those with illegal blood alcohol. They were more likely to be riding the key vehicle in a crash (59%) and more likely to be carrying a pillion who was injured in the crash (6%) compared to licensed riders (4%).

3.4 Alcohol

Where alcohol involvement was known, it was associated with 18% of all rider fatalities and 4% of motorcycle casualties. While this is similar to the corresponding proportions of car drivers (23% and 5%) motorcyclists have much higher alcohol-related crash rates than car drivers.

The alcohol-related fatality rate for riders was six times that of car drivers (0.6 vs 0.1).

3.5 Speed

Most motorcycle crashes (70%) occurred on roads zoned 60 km/h or less, with only 11% of crashes occurring on roads zoned 100 km/h or more.

Compared to other vehicle crashes, a higher proportion of motorcycle crash casualties (24% versus 18%) were assessed as having involved excess speed for the conditions. Note: this does not necessarily mean the rider was exceeding the posted speed limit.
UNLICENCED RIDERS IN NSW CRASHES

Unlicensed riders include those who have been licensed but whose motorcycle licence has been suspended, disqualified, cancelled as well as those who have never held a motorcycle licence. They comprise 7% of all riders in crashes, but account for a relatively high proportion of fatal and behaviour related crashes.

They were involved in 19% of fatal crashes and account for 35% of riders with illegal blood alcohol and they were more likely to be the key vehicle in a crash (59%) and to have a pillion injured in the crash (6%) compared to licenced riders (4%).

The disproportionate contribution by Unlicensed riders to motorcycle crashes and fatalities has been well established for many years. An Australian study of motorcycle fatalities in 1999 found that the fatality risk for responsible (sober, licensed) riders reduced by 53% when irresponsible (i.e. unlawful BAL or unlicensed) riders were excluded from the analysis. However little is known about this high-risk sub-group; why they ride unlicensed or how they can best be brought into the licensing system.
5 RIDER TRAINING AND LICENSING

In 1984, Stay safe conducted an inquiry into motorcycle safety in NSW. As a result of this inquiry, in 1990 NSW commenced the implementation of mandatory rider training. As a part of the implementation the NSW Government established a subsidy system to reduce costs to new riders and address industry concerns about a potential increase in unlicensed riding. At commencement of the scheme the combined cost of the Pre-learner and Pre-provisional courses was established at $100 ($40 Ls, $60 Ps), to be adjust yearly with CPI. Today the Pre-learner course costs $88 and the Pre-provisional course cost $133 (effective 1 July 2015).

The subsidy combined with the rider training tender system have proved to be effective strategies in keeping the cost of rider training services down in NSW. By comparison new riders in other Australian jurisdictions pay two to three times as much for similar training. Higher costs for rider training might have an adverse effect on the rates of unlicensed riding. Due to the competitive nature of the rider training tender system in NSW, the cost of service delivery has remained very low and the scheme operates close to revenue neutral.

Even though the cost of rider training is not a burden on the community, the economic situation over recent years has resulted in a reduction in the resources dedicated to the rider training scheme, both from service providers and the NSW Government. When the scheme commenced there was a dedicated Rider Training unit within the Roads and Traffic Authority (RTA now RMS), there were a specially trained support staff in the RTA/RMS call centre, regular compliance audits and on-going professional development of motorcycle riding instructors. Support staff and services for the rider training scheme in NSW have all but disappeared. As the rider training scheme has performed so well for so many years, it seems to have been left to run its own course.

Whilst the scheme certainly does not need the dedicated resources it had in the 1990's, in order to maintain standards, it is in need of ongoing professional development, quality assurance and regular compliance audits, to improve standards.

Although there have been a number of minor reviews of the NSW rider training and assessment curricula over the past decade, both the Pre-Learner and Pre-Provisional courses are now somewhat dated and in need of a full review. For example, current techniques in education, trends in motorcycle crash patterns and the benefits of technologies such as ABS brakes and traction control should be considered for inclusion in the curriculum.

With regards to the assessment of riders, the Motorcycle Operator Skills Test (MOST) and the Driver Knowledge Test (DKT) are both very old and methods for determining rider knowledge, skills and competency should be reviewed in detail.

Victoria (VicRoads) is in the process of revising its motorcycle graduated licensing system, including developing new mandatory on-road and off-road rider training for both the Learner Permit and the Licence based on a review of current best practice in rider training, licensing and adult learning. An intermediary check on riding progress is also planned between applying for the permit and licence. This work (including several members of the ACRS NSW Chapter) is to be presented at the Australasian Road Safety Conference next month, with the proceedings subsequently to be available on-line at acrs.org.au/publications [Senserrick T, Russell M, McRae D, Wallace P, Blythe R, Mitsopoulos-Rubens E, de Rome L, Rees P, Williamson A. Development of Victoria's New Motorcycle Graduated Licensing System].
The work is undergoing piloting for introduction early in 2016 with an outcome evaluation planned.
6 NOVICE RIDER EXPOSURE AND ASSOCIATION WITH CRASH RISK

Novice riders represent 25% of all riders who crash including Learners (15%) and Provisional riders (10%). We do not know the crash risk rate for novice riders compared to other licensed groups because we do not have reliable information about how much they ride nor any other measures of exposure to provide a denominator for estimates. However population based research suggests that there is no inherent association between licence status and crash risk when age is controlled.3

Over one fifth (22%) of Learner riders who crashed and 20% of the Provisional riders who crashed were aged over forty years. Further work is required to determine the other factors that need to be taken into account to determine and manage the risks to novice riders’ practice. These include exposure in terms of hours and kilometres ridden, type of riding (e.g. commuting versus recreational), traffic density and road usage type as each type may involve different risk factors.

The recent increased proportions of novice riders in crashes is likely a reflection of changes to their proportions in the population of riders as a whole since the introduction of a Graduated Licensing Scheme (GLS) for riders in 2009. Under the GLS for riders, the duration of the rider Learner licence was extended from six to twelve months, and the duration of the rider Provisional licence period extended from one to three years. An exemption to the Provisional conditions, previously available to novice riders aged over 30 years was also modified.

Riding practice is essential for novice riders to develop their skills, but the critical question is how this is best managed without increasing their crash risk. The role of GLS in controlling exposure to risk has proven successful with novice drivers.4 However the assumptions that apply to novice driver GLS do not necessarily apply to novice rider GLS. In particular, the presence of a supervising driver next to the Learner, who is able to share the driving tasks (such as hazard perception) and assist with controlling the vehicle if needed, is associated with the Learner Permit phase as the lowest risk driving phase, while the first months of Provisional licensure are the highest risk driving phase (for all new drivers irrespective of age). There is no equivalent phase or conditions for motorcyclists. In contrast, they experience the highest crash risk as they first start out as a Learner. Differences in novice rider and driver demographics are also worth noting.

Novice riders, on average, are older (31 vs. 18 years) more likely to be male (81% vs. 45%) and employed full-time (81% vs. 12%) than novice drivers. They are more independent, with more resources and other transport options.

In NSW, novice drivers are required to have a minimum of 120 hours of on-road supervised practice sessions including 20 hours of night driving before attempting the Provisional licence test. They are also encouraged to practice under all types of weather and traffic conditions.

There are no comparable requirements for Learner riders; they do not have the protection of the supervising driver and the consequences of error are more severe. The intention is to encourage self-regulation by not setting time frames or challenges, which may cause some riders to take increased risks in order to complete the requirements for licensing. There is
evidence that many Learner riders self-manage their risk by limiting exposure to challenging conditions. While Learner riders in this study had an average of 101 hours and 6 months riding experience when they applied for their Provisional licence, many had limited practice in adverse or challenging conditions. These included substantial proportions who had ridden five or fewer times at night (36%), in rain (46%), on main roads or highways (27%) or on high speed ($\geq 100$ km/h) roads (51%).
7 INCREASING THE USAGE OF MOTORCYCLE PROTECTIVE CLOTHING

Australian research has provided strong evidence that motorcycle protective clothing reduces the risk of serious injury by 21% and subsequent disability in crashes.\textsuperscript{6,7}

NSW has relatively high protective clothing usage rates compared to warmer areas of Australia such as Queensland.\textsuperscript{8} Most motorcyclists in NSW wear helmets (100%), motorcycle protective jackets (82%) and gloves (73%) and over half wear protective pants (56%) and boots (57%).\textsuperscript{3} Scooter riders have the lowest rates of usage and this may be related to the way they are portrayed in advertising as not requiring the same levels of protection as motorcyclists.\textsuperscript{9,10,13}

Regulation of helmet usage has proved highly effective in creating almost universal usage in NSW.\textsuperscript{3} Regulation requires that lawful products must be available to the market and be defined such that they can be enforced. For helmets, this is possible via Australian Standards, with an appropriate label identifying compatibility clearly visible. These conditions are not currently possible regard to motorcycle protective clothing (Personal Protective Equipment, or PPE), including the availability of quality PPE in the Australian market. Recent research shows that a substantial proportion of PPE worn by Australian riders fails under crash condition.\textsuperscript{6,11,12} There are also limitations in the availability of PPE for women as the motorcyclist market is predominantly male (86%).\textsuperscript{3,12} It is important to note that to be effective, protective clothing must fit snugly to ensure the protective shell and particularly body armour stay in place during a crash event.\textsuperscript{13,14} and therefore ill-fitted PPE on women is unlikely to offer full protection.

Measures to improve the quality of the available PPE include regulation of the industry through standards or establishment of an independent rating system to create consumer demand.

There are European standards but no Australian equivalents for PPE. The development of standards is time consuming, costly and requires the cooperation of industry. Motorcycle clothing is a global industry for which Australia is a very small market. If Australia did develop a local standard this may result in limiting the range of products available to Australian riders. The disadvantage of a standards approach is that standards identify a minimum acceptable level of performance for a particular product, often on a number of dimensions, with tests to determine whether or not that product reaches the minimum level of performance. A standards regime also risks creating a market for products that are falsely labelled as complying with the standard as has happened with bicycle helmets.\textsuperscript{12}

Instead of regulating protective clothing, successive government commissioned reports by the leading Australian road safety researchers in this field have recommended establishment of a rating system based on independent testing of the products available to consumers.\textsuperscript{12,15,16} These reports have recommended that products be tested for both protective and thermal management performance to ensure products are suitable for the Australian climate.

The preferred and recommended approach is a star-rating system similar to the ANCAP model for cars which has proved highly successful in increasing the market for car safety features. The aim of a rating system is to use consumer demand to promote sales of better-performing products. The authors concluded that compared to a ratings system, the pass/fail
outcome of a standard would not provide manufacturers with incentives to produce goods that exceed the standard nor allow the public to choose the best performing products.\textsuperscript{15,16}

Thermal comfort has been identified as a key disincentive to usage of protective clothing. Riders who do not always wear protective clothing have been found to be three times less likely to wear full protective clothing in hot weather due to heat discomfort.\textsuperscript{8,10} Recent research has confirmed that the potential for significant physiological strain is associated with motorcycle protective clothing in hot conditions with ongoing work investigating the impact of elevated thermal discomfort and physiological strain on riding performance.\textsuperscript{17,18} To-date there is evidence that a substantial proportion of the available protective clothing, might be unsuitable for usage in Australia in hot weather.\textsuperscript{11,17,18}

Australia and New Zealand are currently working towards a star rating system for protective clothing, based on independent testing similar to NCAP. The project is led by the Transport Accident Commission (TAC) and supported by VicRoads, NRMA and RACV.
8 CONCLUSIONS

The following points are presented to highlight the key conclusions of the NSW Chapter with regard to addressing motorcycle safety as outlined in this submission:

- Despite a significant increase in motorcycle registrations over the past decade, motorcycle crashes continue to trend downwards.
- In line with trends in the general population, the motorcycle riding population is aging. The vast majority of motorcycle ownership is with riders in and over the 40’s demographic. To ensure continued and improved safety for motorcycle riders, the changes in the riding population demographics will need to be considered in future strategic planning.
- For many years NSW has been a leader in the training and licensing of motorcycle riders in Australia. However, progress has stagnated and the training and licensing systems are now due for review.
- Unlicensed riding continues to be a major problem and more research is needed to better understand this issue.
- The effectiveness of motorcycle PPE may be enhanced by educating and supporting consumers in their purchasing of motorcycle appropriate protective clothing.

While there is a need for improvement in PPE design and accessibility within the NSW market, regulation should be approached with caution as it may result in adverse consequences. A star-rating style system that provides information to consumers about the safety performance of PPE is supported.
REFERENCES

1. FORS. ROAD BEHAVIOUR OF UNLICENSED MOTORISTS INVOLVED IN FATAL CRASHES. Canberra, ACT: Federal Office of Road Safety;1997.


ACRS Policy Position
ACRS supports measures that take full consideration of the needs of motorcyclists as a distinct road user group.

Objective
To improve the safety of motorcyclists to that which is comparable to world's best standard.

Discussion
The ATSB's Monograph 4, Motorcycle Safety, indicates that compared to other OECD countries Australia has the sixth worst record. European countries where motorcycles are a more accepted means of transport have a safety record far superior to that of Australia.

In the past 20 years the needs of other vulnerable road users (pedestrian and pedal cyclists) have been recognised and are gradually being incorporated into road and transport systems. There have been significant improvements in road safety for these groups over this period.

Motorcycle usage is on the increase with a shift in the demographics to greater recreational usage by older riders. The average age of motorcyclists is now in the late 30's. There has also been an increase in the number of female riders.

The causal factors involved in motorcycle injuries and fatalities need to be thoroughly investigated so effective countermeasures can be developed and implemented.
APPENDIX B  ADDITIONAL COMMENT FROM NSW CHAPTER MEMBERS

The following points have been submitted from members of the ACRS NSW Chapter. It is noted that some areas in these individual submissions may not align well with key points presented in the main body of this report, and the comments are the views of the member alone and not necessarily those of the ACRS, the NSW Chapter, the Chapter Committee or the authors of this submission.

B.1 Submission comments by: Gray Knight MEd (Adult), Education & Research

Gray Knight is a former Rider Training/Programme Coordinator with the NSW RTA who has held the following positions within the RTTS: Accredited Riding Instructor & Testing Officer [Sydney & Regional centres]; Senior Riding Rider Training Coordinator [NSWRTA]; Programme Coordinator NSWRTA]; Chief Riding Instructor; Educational Researcher.

The following content is based upon research conducted by the writer and has an educational focus.

The philosophy and intent of the Pre-Learner course:

- The course is designed to teach a novice applicant the basics of learning to ride.
- It is more concerned with teaching people to learn to ride than teaching all there is to know about riding.
- It is designed to be a ‘one size fits all’ standard course whether it's conducted in Central Sydney or the far north coast (For example).
- The 30 activities in the course form 30 smaller parts of 1 activity, rather than 30 (at times perceived as) 30 individual activities, therefore the course is not ‘30 things a motorcyclist must know’ but a body of information made up of 30 smaller parts.

Strengths:

- In the early stages it was determined that current best educational practice was to include the use of sequences, systems & key teaching phrases throughout.
- The sequences, systems & phrases are introduced at particular stages in the course & recalled strategically throughout, making extensive use of the educational principles of overlearning & hierarchical/systematic learning.
- When a new concept is introduced to trainees, a now familiar system/sequence/phrase is used to introduce the new concept.
- Every riding activity is first demonstrated by the instructor, using recognised principles of demonstration.
All trainees have opportunity to practice the activity or concept, using the demonstrated method. Minimum practice times are compulsory. The practice times have been carefully worked out to take into account the following issues: a minimum number of repetitions, to allow for 'mapping' - a technique whereby trainees can enable a new skill to be mapped onto their short term memory to make recall and learning transfer easier & more accurate; minimising trainee overload and consequently reducing on range incidents.

The course is divided into 2 x 3 1/2 hour sessions (usually over 2 consecutive days). The first day teaches and develops foundation skills: the basic skills required to operate a motorcycle, from mounting & dismounting up to and including changing gears.

Some activities teach principles; some teach specifics. All "dovetail" to teach the aforementioned, body of information.

Day two teaches road craft (that is, recognising hazards & reducing risk). It attempts to teach this interactively.

All training is done on an approved training range of approximately 40 m x 20 m with a class size of 5 trainees. On day 2 trainees cover approximately 9 km on this range, learning (in addition to the specified outcomes), how to interact with other riders (road users).

There is minimum theory time & the best use of practical time (meaning that over one entire course, each trainee will cover 12-13 km).

The road craft focus of day 2 is in line with current RMS driving test requirements (to the best of my knowledge).

Between day 1 and 2, trainees are given homework, included in which is the encouragement to research motorcycle protective clothing, ready for discussion on day 2. Trainees are given resources and guidance on what to research. This is to replace a protective clothing "lecture" where instructors invariably told their own "war stories" and gave their own opinions, causing 2 problems, 1) a deviation from standard approach & 2) the high potential for erroneous information.

Weakness

The requirement for an educator (preferably a motorcyclist) to review & update the course. This is not necessarily a weakness but where such an individual does not exist, the course remains static & does not address the current trends.

Day two, although addressing road craft, does not have the required retention and transfer rates, unlike day one. This is due to fewer repetitions of the training task & information (as distinct from riding) overload.

Too much information & too many learning tasks are incorporated into the two days.

When graduates of the course present for the Pre-Provisional course, very few demonstrate difficulties in performing (Pre-Learner course) day one tasks, yet a very high percentile demonstrate little or no understanding of day two tasks and concepts.

An almost equally high percentile of trainees presenting for their Pre-Provisional course are unable to recall or demonstrate road craft principles, when riding on the public road, even though the entire second day is focussed on that specific topic.