

Mailing Address:

GPO Box 1555
Canberra ACT 2601

Address:

103 Northbourne Ave
Canberra ACT 2601

P 02 6247 7311

T @aaacomms

W www.aaa.asn.au

MEMBER OF

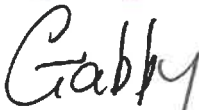


Ms Gabby O'Neill
Head, Office of Road Safety
Department of Infrastructure, Transport, Regional Development & Communications
GPO Box 594
CANBERRA ACT 2601

Via email: roadsafetystrategy@infrastructure.gov.au

23 March 2021

Dear Ms O'Neill



RE: AAA Submission to the Draft National Road Safety Strategy 2021-30

Please find attached a copy of the AAA's submission to the Office of Road Safety's consultation on the Draft National Road Safety Strategy 2021-30.

The AAA greatly appreciates the opportunity to provide feedback on the work being undertaken to develop this important document, however we regret that its content appears incomplete.

At its core, the Consultation Draft:

- fails to provide the draft safety performance indicators that the Office of Road Safety has been developing throughout 2020-21 to underpin the next NRSS
- remains silent on what proposed measures are aimed at holding state and territory governments to account for their road safety commitments in return for Commonwealth funding
- specifically refuses to commit to ongoing reporting of the actual road toll (fatalities and injuries) despite the Office of Road Safety's official position being that "the primary measures of success are the overall reductions in road trauma."
- foreshadows a further four-year delay before the data hub is fully able to provide factual and timely evaluation of road safety policies, and
- fails to articulate responses to the recommendations of successive government and parliamentary inquiries into road safety, including the *Inquiry into the National Road Safety Strategy 2011-2020*; the *2019 Review of National Road Safety Governance Arrangements*; and the 2020 Joint Select Committee on Road Safety.



In correspondence from the Deputy Prime Minister to the AAA, dated 23 July 2020, there was a commitment that “the new Strategy and first National Action Plan [will] have regard to the [Joint Select] Committee’s findings before governments proceed with their final endorsement.”

As previously communicated, the AAA was hoping the findings of these inquiries would deliver a 2021-30 Strategy that addressed identified past failings relating to inadequate commonwealth leadership, governance, responsibility, measurement, accountability, and transparency. While the Draft Strategy for 2021-30 acknowledges some of these elements, it provides no detail on how any are to be addressed.

The AAA views the above dot-points as glaring omissions from a Draft Strategy, which appears to lack the controls or mechanisms needed to achieve its stated aims.

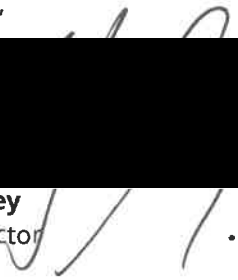
While the AAA is disappointed that the draft safety performance indicators are not included in the Consultation Draft, we look forward to being consulted on their development before being finalised.

Thank you again for the opportunity to provide feedback and please find attached a document outlining our concerns in greater detail.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

Michael Bradley
Managing Director

A handwritten signature in blue ink, partially obscured by the redaction box and the typed name below.

AAA Submission to the Draft National Road Safety Strategy 2021-30

The Australian Automobile Association (AAA) is the peak organisation for Australia's motoring clubs and their 8.5 million members. The Association's constituent clubs are the NRMA, RACV, RACQ, RAA, RAC, RACT and the AANT. The AAA regularly commissions research and develops in-depth analysis of issues affecting transport systems, including affordability, safety, and fairness.

Road trauma continues to hospitalise 100 Australians per day and close to 100 Australians are still killed on our roads every month. While the COVID-19 pandemic and its impact upon traffic volumes and transport usage appears to have delivered a temporary reduction in road trauma nationally, Australia's road safety performance has not improved significantly throughout the past decade.

The AAA has since 2011 benchmarked the progress of the National Road Safety Strategy on a quarterly basis, and in recent years has also reported on the Strategy's progress against its agreed KPIs.

The AAA has been highly critical of the 2011-2020 Strategy's implementation and highlighted well understood failings of governance and accountability.

Tragically for those affected by the consequences, around half of the Strategy's KPIs were missed, and a further quarter were not even being reported by 2020, because targets or methods of measurement had not been agreed.

The AAA is disappointed the Draft *National Road Safety Strategy 2021-30* (the Draft Strategy) does not adequately address the failings previously identified in the Government's own endorsed inquiries into the 2011-20 NRSS. Both the 2018 *Inquiry into the National Road Safety Strategy 2011-2020*, and the 2019 *Review of National Road Safety Governance Arrangements*, highlighted deficiencies with core issues such as the lack of Commonwealth road safety leadership, governance, responsibility, measurement, accountability, transparency, and that road safety needed to be embedded in all layers of government business.

The Parliamentary Joint Select Committee (JSC) into Road Safety in October 2020 reaffirmed support for the 2018 Inquiry and many of the recommendations highlighted of that Inquiry, as well as those in the 2019 Governance Review. The JSC recommendations included collecting, harmonising, and regularly publishing crash data, embedding safe systems principles across government areas, building skills and expertise in all areas of road safety and, importantly, the establishment of a Standing Committee on Road Safety.

Rather than a focused effort to address in detail the recommendations and findings of these past reviews, along with setting out clear and concise pathways that remedy these well-known problem areas, the Draft Strategy provides only superficial acknowledgement of the need to address them.

If governments endorse a 2021-30 Strategy that contains the same shortcomings as its predecessor, then we should not be surprised when it too fails to deliver the reduced rates of death and injury that Australians deserve and desire.

Consistent with the previous inquiries, the AAA again raises the following issues.

Lack of strategic approach

Any successful strategy needs:

- **agreed actions** (what will be done to achieve the desired targets/objectives)
- **responsibilities** (who specifically will undertake these actions)
- **accountabilities** (what the consequences are to be faced by an entity that fails to undertake an agreed action for which it is responsible)
- **KPIs** (how we will know whether the agreed actions are working).

The Draft Strategy contains no details of any of these elements and specifically states that a set of “Safety Performance Indicators” are yet to be finalised (page 25).

The AAA sees these as fundamental strategic flaws of a Draft Strategy that appears to lack the controls or mechanisms needed to achieve its stated aims.

The Draft Strategy leaves too many critical questions unanswered, and without any action plan it is not possible to determine how well, if at all, its objectives could be achieved.

The AAA is also concerned by the Office of Road Safety’s advice (during online consultation with AAA staff), that the Draft Strategy’s action plan will not be released for public consultation. The AAA believes it is essential that any action plan be presented as a central element of a Draft Strategy, which can then clearly articulate the roles and responsibilities, plus the accountabilities and KPIs, of the Office of Road Safety and state agencies.

Lack of Commonwealth Government leadership

The first finding of the 2019 *Review of National Road Safety Governance Arrangements* said:

The Australian Government has not provided sufficiently strong leadership, coordination or advocacy on road safety to drive national trauma reductions. The Transport and Infrastructure Council (TIC) has not been used to enable cross-jurisdiction decision-making to drive the national harm elimination agenda.

The Draft Strategy does not provide detail on how this is being addressed, or:

- how it plans to engage all necessary governments and stakeholders to commit to achieving targets and deliver on their commitments
- how it plans to ensure it has the necessary resources and controls in place to effectively lead and coordinate actions underpinning a national road safety strategy
- how it plans to build capacity across the various road safety sectors to address future skills shortages (as highlighted by the 2018 Inquiry).

If the Commonwealth is to take effective leadership on national road safety, then lessons learnt from the following three examples need to be referenced in the next National Road Safety Strategy:

1. Real-time data reporting (COVID-19)

The Government's response to the COVID-19 pandemic has highlighted that the Australian federation can produce daily hospitalisation data and real-time state comparisons. With Commonwealth leadership and coordination, the National Cabinet also responded in real time with policy decisions across portfolios based on new data, while it also developed new communications and enforcement technologies needed to make them effective. The next NRSS provides an opportunity to mirror and embed the success of commonwealth-state-territory cooperation on data reporting.

2. Funding

The establishment of the \$2 billion Road Safety Program in October 2020 shows that it is possible for the Commonwealth to attach strings to the infrastructure funding it allocates to states and territories. If states and territories are to be held accountable for the obligations they hold within a National Road Safety Strategy, then the leveraging of Commonwealth spending to generate timely, consistent data for national interrogation must be included in the next NRSS.

3. Oversight

The Australian Parliament has a Joint Select Committee on Road Safety that has made clear its desire to play a permanent role in overseeing and scrutinising the work of the Federal Office of Road Safety and the implementation of a National Road Safety Strategy. The AAA thinks this is to be supported and embedded in the 10-year plan.

Opportunities for Commonwealth leadership need to be grasped in the Draft Strategy.

Data management

The *Frequently Asked Questions* document released with the Draft Strategy states "The \$5.5 million National Road Safety Data Hub will be delivered over the course of four years". This would equate to being six years since the Deputy Prime Minister wrote to the AAA (correspondence dated 13 November 2019) identifying that "enhanced data and evaluation systems will play a vital role in properly tailoring initiatives, responding to new issues and ensuring the next strategy achieves its objectives."

This timeframe for a completed National Data Hub is problematic given the essential contribution valuable crash data provides to developing effective road safety interventions.

This problem is best reinforced by the words of the Deputy Prime Minister, in correspondence to the AAA dated 30 June 2020, where he said: "ensuring we can collect and use more meaningful road safety data will be critical to assessing that the policies all governments put in place are working."

Given the Minister has ranked as 'critical' the need to have meaningful road safety data for ongoing assessment that policies are working, it is incongruent for the draft NRSS to propose that such a key feature will only be finalised roughly half-way through the term of the Strategy.

This again highlights the lack of urgency given to addressing recommendations of the previous Strategy's inquiries, where collecting, collating, harmonising, and interrogating data were identified as essential enablers. The national COVID-19 response has shown that a process for collating and reporting on health data collected by state agencies in a detailed and timely manner is achievable within a very short period.

Targets

The AAA has serious concerns that the Draft NRSS does not target, measure, or report on the actual road toll.

The long-term goal of the draft NRSS is for "zero deaths by 2050 and zero injuries by 2050". Yet the Draft Strategy only proposes to monitor progress towards several types of measures including the headline trauma reduction targets – which are only listed as per capita reductions.

There is no explanation as to why progress on the long-term goal of the Draft NRSS – the very core purpose for the Strategy's existence – will not be monitored or reported on.

Concerningly, the Deputy Prime Minister (in correspondence dated 30 June 2020) gave an undertaking in relation to the next strategy that "the Office of Road Safety is giving considerable attention to establishing a robust set of Safety Performance Indicators for the next Strategy, to ensure the priority activities included in the first Action Plan can be tracked and assessed for effectiveness."

The Office of Road Safety's 'fact sheet' on top safety performance indicators states that "the primary measures of success are the overall reductions in road trauma."

A strategy should therefore report on the Office of Road Safety's acknowledged "primary measures of success".

To avoid a situation where there is a NRSS that does not measure progress towards its ultimate goal, the AAA advocates that the absolute number of fatalities and injuries is monitored and reported, in addition to the rates per capita, for both the interim targets as well as the long-term goal.

Lack of focus on targets, results, and the timely and consistent reporting against KPIs

The Draft Strategy does not provide detail on targets or milestones beyond the headline reductions in fatalities and serious injuries. Specifically, it does not adequately detail:

- what metrics, milestones and targets the Office of Road Safety considers essential to the effective management and monitoring of road safety interventions
- how it plans to ensure all data essential for road safety decisions and interventions is provided in a timely and useable fashion. At the conclusion of the previous strategy there remains no publicly available or nationally aligned injury data that is reported in a timely manner. (The action plan must clearly set out how the sharing of data and best practice across jurisdictions will be facilitated.)
- how the Office of Road Safety will compile and report on road safety metrics that provide clear, complete, and concise public visibility of how the strategy is tracking against key road safety metrics. (The Draft Strategy notes the role of a possible external advisory group reporting annually on progress to the Infrastructure and Transport Ministers' meeting, but without clarity on any public release of findings).

Lack of clarity around responsibilities and consequences

The Draft Strategy does not provide detail on how each of the responsible entities will be held accountable for the delivery of required actions.

The AAA wrote to the Office of Road Safety in August 2020 emphasising the need for the inclusion of compliance mechanisms in the next NRSS, as well as consequences for failing to monitor or report on agreed targets. It was further added that enforcing transparency and accountability must be central to future Commonwealth road safety leadership.

The social model described in the Draft Strategy will exacerbate the weaknesses of responsibility and accountability by spreading responsibility over many parties in a wide range of organisations and sectors, thereby diluting accountability.

The AAA believes tying federal infrastructure funding to states and territories meeting their reporting obligations would be an effective incentive mechanism to improve transparency, accountability, and in turn, deliver road safety outcomes.

Additionally, the 2019 Governance Review highlighted several areas where there are 'system-wide gaps' in road safety governance. These include a leadership failure by the Australian Government to use the Transport and Infrastructure Council *"to enable cross-jurisdiction decision making to drive the national harm elimination agenda."*

It also said the Safe System not being ingrained in all layers of government business; road safety teams lacking influence across the Safe System pillars; local government being neither engaged nor resourced to deliver road safety; and *no agreed national framework for road safety performance information* were further examples of governance failings.

The Draft Strategy lacks detail on who will be responsible for managing how the many stakeholders coexist and deliver within the social model approach and how their contribution is supporting key road safety performance priorities. It also lacks detail on how the Office of Road Safety will ensure the numerous action plans, projects and programs from multiple contributors are coordinated and aligned to avoid a piecemeal approach to road safety interventions.

Conclusion

Regardless of whether the Draft Strategy's nine priorities are correct or otherwise, without the required controls or mechanisms capable of ensuring success (the clear articulation of actions, responsibilities, accountabilities and KPIs) then this Strategy is destined to fail.

In response to the NRSS Consultation Draft, the AAA calls for:

- inclusion of rigorous road safety accountability and reporting requirements for state and territory governments as a condition of commonwealth funding.
- inclusion of specific Commonwealth, state, and territory government actions, responsibilities, and accountabilities.
- inclusion of key performance indicators capable of informing whether agreed actions are effective over time.
- the fast-track of a 'data hub' with a demonstrated commitment to incorporate the learnings from the Government's response to the COVID-19 pandemic, by ensuring real time detailed reporting of road fatality and injury data and trends.
- acknowledgment that the Office of Road Safety agrees that the "primary measure of success" is the overall reductions in road trauma, and therefore enshrines a commitment to measure and report on absolute fatality and injury rates, in addition to per capita rates.
- support for a Parliamentary Standing Committee on Road Safety to allow the ongoing and routine scrutiny of the progress of the next National Road Safety Strategy
- articulation of actions flowing from the recommendations of the 2018 *Inquiry into the National Road Safety Strategy 2011-2020*; the 2019 *Review of National Road Safety Governance Arrangements*; and the 2020 Joint Select Committee on Road Safety.