Hello,

The Australian Institute of Health and Safety (AIHS) represents more than 20,000 professionals and practitioners in Australian work health and safety (WHS).
With more than 4,000 members and a 70+ year history, we are the peak body for health and safety in Australia.

This email is our response to the Road Safety Strategy 2021-30. As communicated earlier today, we had some trouble with the online portal, hence this direct email.
We would like to thank you for the opportunity to provide feedback.

Area of response:
Workplace road safety

What is your primary area of interest in road safety?
Reducing the impact of road trauma on Australian workers, employers and the communities in which organisations undertake road-based work.

What road safety issues are the most important to address?
Ensuring Australian employers and workers understand their OHS/WHS obligations in relation to road safety.
Preparing our road laws, infrastructure and community expectations for automated vehicles.
Continue to emphasise the focus on speed reduction, from a systems inputs and outcomes perspective.

What do you believe are the strengths of this draft Strategy?
The AIHS commends the stakeholders involved in the development of this draft strategy.
The nine priority areas appear comprehensive in their scope and breadth.

Is there anything important that you think is missing from this draft Strategy?
We would like to understand further the origins and evidence-based/theory behind the 'social model' approach.
Roads are effectively are a complex system. We don't understand the value in inserting individuals into being responsible for system-wide deficiencies.
The statement from the consultation records ("Use of safety management systems to put in place and monitor workplace road safety practices/policies. Promoting the potential cost savings as a result of improving road safety for a workplace would assist in businesses engaging with this issue.") are salient points. We would like to

see the strategy document itself expand on these points in the respective 'Workplace road safety' priority area. If not possible, we understand the subsequent Action Plan may contain further detail here. We would welcome the opportunity to provide extensive input into this section of the Action Plan/s.

To quote the author in the relevant chapter of the OHS Body of Knowledge (www.ohsbok.org.au) "Physical Hazards: Vehicles and Occupational Road Use":

"Risks associated with occupational road use should be addressed through integrated OHS risk-management processes. Identification of occupational-road-use risks and related

hazards, and the implementation of appropriate control strategies should be based on a hierarchical approach, which recognises that the vehicle is the equipment being used and

the road is the work environment. Engineering controls should include the use of evidence-based vehicle (or equipment) selection using resources such as the Australian New Car

Assessment Program (ANCAP), and the implementation of managed maintenance and procurement programs...

While many organisations have developed Safe Driving Policies as part of their overall OHS program, it is important to recognise that these are unlikely to succeed if they rely on the expectation of changing driver behaviour alone. Administrative controls, which have been the basis of many public health road-safety programs, are unlikely to be effective within an OHS risk-management program unless they are supported by practical engineering controls (e.g. the use of safer vehicles on safer roads), with strategically supported trip management (e.g. the provision of accommodation on long trips, rather than continued driving)."

Please do not hesitate to contact myself for any clarification.

Kind regards,

Andrew Heinrichs
Victorian Branch Committee Chair