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Dear Gabby,

**National Road Safety Partnership Program**

Monash University Accident Research Centre  
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[www.nrspp.org.au](http://www.nrspp.org.au)

**Submission in response to the Draft National Road Safety Strategy 2021-2030**

On behalf of the National Road Safety Partnership Program (NRSP), I am delighted to make a submission to the Commonwealth Office of Road Safety in response to the Draft National Road Safety Strategy 2021-2030. While this submission will provide some general comments on the Draft Strategy, it will primarily focus on the priority area of Workplace Road Safety. As outlined below, this priority area strongly aligns with the purpose of the NRSP, so we are pleased to take this opportunity to contribute to the development of the next National Road Safety Strategy and related action plans.

**Details of the NRSP**

NRSP's purpose is to facilitate knowledge transfer to help organisations, both private and public, reduce the risk posed to their workers when they drive and to the communities they operate within. This is particularly relevant when workplace related road fatalities remain static and serious road trauma has increased nationally, as recognised in the current National Road Safety Action Plan.

It is also important to note that the NRSP was established in response to industry concerns about the scale of the work-related road safety problem. Our Steering Committee comprises a wide range of industry leaders together with government representatives. We have created a technology and knowledge transfer mechanism, which is freely available. The program provides unique sharing of experience across industry sectors based on the belief that safety is not a competitive advantage but a shared responsibility and a sound business investment.

The NRSP was established in 2014 and is currently funded by the National Heavy Vehicle Regulator (NHVR), NSW Department of Transport, NSW State Insurance Regulatory Authority (SIRA), Queensland Department of Transport and Main Roads, Road Safety Commission (RSC) and the Transport Accident Commission (TAC).

The NRSP is proudly hosted by Monash University Accident Research Centre which allows the program to draw on the immense resources of one of Australia's largest universities.

**The Origins of the NRSP**

The NRSP was created by the National Transport Commission (NTC) in response to the National Road Safety Strategy 2001–2010, which made the case that society as a whole needs to share the responsibility for enhancing road safety; it is not just the domain of government. A key area of

opportunity identified was workplace road safety and how organisations and businesses can do more to enhance road safety not only amongst their workers but within the sphere of their operations.

Moreover, two thirds of all work-related fatalities involve a vehicle, so improving the safety of people who drive for work is a priority for occupational safety, as well as road safety.

### **Diversity of NRSPP Partner Experience**

Since its inception, the NRSPP has grown to include over 185 partner organisations incorporating a broad range of industry sectors, transport types and approaches to risk management. The NRSPP Knowledge Centre includes nearly 2000 resources with nearly 400 developed collaboratively with partner. The NRSPP is not centred on a particular mode of transport or industry sector, but rather on the road safety problem. It collaboratively draws together a broad range of partners from a range of industries, research and government to explore the issue and identify solutions.

Over recent years, the program has developed and delivered a range of projects and hosted various working groups exploring a broad range of topics as directed by its Steering Committee. A few examples include:

- Development of the Organisational Road Safety Guide
- Delivery of the ACT: Road Safety Trust funded Organisational Benchmarking Project
- Preparation of a Grey Fleet Management Guide and related supporting content
- Preparation of Grey and Light Fleet: Legal Implications for Business research papers
- Preparation of Safe Use of Mobiles in Vehicles Guide and supporting tools
- Development of a broad range of NRSPP industry content
- Development of Tool Box Talks for delivery by industry
- Supported the Re:act – Corporate Social Responsibility initiative
- Convened the Utilities Forum and delivery of five industry-led forums
- Supported the development of the Empowr Mobility – Corporate Social Responsibility program
- Led the adaption of Transport for London’s Construction Logistics and Communication (CLOCS) program to the Australian context (CLOCS-A)
- Convened the Austroads National Project: Suicide in Road Transport initiative.

## **Comments on the Draft National Road Safety Strategy**

### *General comments*

The NRSPP commends all those involved in the development of the Draft Strategy and strongly supports many of its key elements. From an overarching perspective, it is very encouraging to see the commitment to a long-term goal of zero fatalities and serious injuries by 2050. Likewise, the NRSPP is pleased to see the inclusion of fatality and serious injury reduction targets for 2030. While we believe that the adoption of a 50 per cent fatality rate reduction target in absolute terms would have represented a more ambitious option, the per capita target will facilitate the monitoring of progress both across Australia and with other countries. Similarly, while the 30 per cent per capita reduction target for serious injuries is not as ambitious as it could have been, it is acknowledged that it is an interim target subject to change over the life of the strategy.

The NRSPP is also encouraged that the Draft Strategy is underpinned by the Safe System Approach. While we believe there is a need to continue to evolve this approach to better reflect systems-based thinking, it represents a central tenant of road safety strategies across Australia as well as many other

countries, thereby providing a unifying element. The NRSPP continues to champion systems-based approaches and the need for a “shared responsibility for road safety” with its partners and industry. Many of NRSPP’s partners have structured their workplace road safety strategies based on NRSPP guides and materials which all centre on the Safe System and how to apply it holistically not in silos.

The NRSPP also supports the various priority areas identified in the Draft Strategy (subject to some suggestions below). Firstly, it is encouraging to see the traditional focus on safe roads, safe vehicles and safe road users augmented by the inclusion of various at-risk priority groups, including vulnerable road users, regional and remote road users, and Indigenous road users. Secondly, while we believe that it would have been useful to include speed management as a priority area in its own right (in order to increase the visibility of good practice speed management principles and practices), it is pleasing to see that it’s been retained as critical cross-cutting theme. Thirdly, we strongly support the inclusion of Workplace Road Safety as a priority within the strategy and provide specific comments about this area below.

Before providing these specific comments, we would like to highlight some potential opportunities to enhance the Draft Strategy, which may also be relevant to the development of the National Road Safety Action Plan 2021 – 2025. Among the opportunities that we would suggest warrant further consideration are:

- Strengthening the focus on post-crash care, which currently gets little attention;
- Providing more detail around the proposed application of the social model to support the implementation of the strategy and action plans;
- Providing more detail around the proposed processes for improving governance and accountability in relation to the strategy and action plans, including the role of the proposed external advisory group and the potential to establish a Parliamentary Standing Committee on Road Safety; and
- Providing more specific examples of how the ‘movement and place’ framework can be adapted to enhance road safety processes.

### *Specific comments relating to Workplace Road Safety*

As noted above, the NRSPP strongly supports the inclusion of Workplace Road Safety as a priority area within the Draft Strategy. This inclusion aligns the National Strategy with both the current New Zealand Road Safety Strategy and the Victorian State Road Safety Strategy. In the case of Victoria, this inclusion has ensured that there is a clear role for WorkSafe Victoria within the state’s strategic framework, thereby encouraging them to play a more active role in road safety. The inclusion of Workplace Road Safety in the Draft Strategy is also very timely given the changes in work practices that have been brought about by or, at least accelerated, by the growth in the gig economy and the impact of COVID-19. Below are various suggestions to further strengthen the Workplace Road Safety priority, both within the Draft Strategy and the Action Plan under development.

#### *The need to integrate Heavy Vehicle Safety with Workplace Road Safety efforts*

The Draft Strategy currently includes 'Heavy Vehicle Safety' and 'Workplace Road Safety' as separate priority areas. However, there are many commonalities in good practice approaches to road safety across both light and heavy vehicles used for work purposes. Moreover, both groups of drivers use the same road environment and are influenced by similar workplace pressures. Hence, consideration should be given to integrating these two priority areas in order to promote the transfer of good practice

knowledge and approaches across the work-related domain. This would avoid a siloed approach to enhancing work-related road safety, which may lead to fragmentation of effort, rather than systems-based improvements.

#### Enhancing the voluntary uptake of vehicle safety technologies in vehicle fleets

The NRSPP welcomes the inclusion of the following action within the Vehicle Safety priority area:

*‘Encourage and promote voluntary uptake of vehicle safety technologies ahead of regulation, including through ongoing support of the Australasian New Car Assessment Program (ANCAP) and through fleet purchasing policies.’*

Whilst a positive action, it needs to be accompanied by an implementation guide. Such a guide is required to ensure that the 5-Star ANCAP vehicles selected by organisations are actually ‘fit-for-purpose’. To illustrate, an organisation may have a 5-Star ANCAP purchasing policy for its vehicles but still select vehicles which are not appropriate for the task. Furthermore, ANCAP has been continuously improving their safety ratings system over time, which means that a 5 Star rated vehicle from ten years ago would not be classed 5 Star in a 2021 crash test. Fleet purchasing policies need to reflect this continuous improvement. Consequently, consideration should be given to modifying this action to specifically refer to the purchase of vehicles that not only have a recent 5-Star rating but are also ‘Fit-for-Purpose’.

#### Ensure organisations are aware of their WHS duties in relation to vehicles and road safety

Although most organisations are aware of their WHS responsibilities, implementation of targeted and feasible intervention is often difficult. A stronger strengths-based action would be to include providing employers with the knowledge and tools to identify, understand and best manage their risk. This also involves the role of regulators and government bodies.

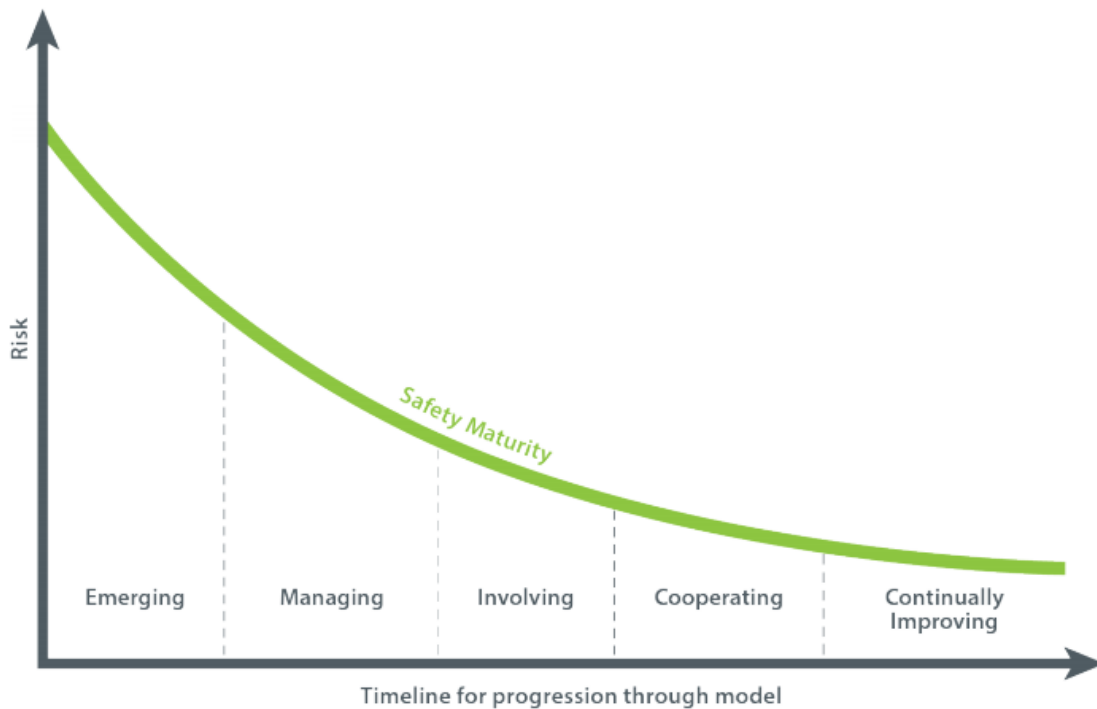
The NRSPP would like to see clear leadership from the Commonwealth with all of Heads and Secretaries of Departments championing WHS Duties and publicly reporting their performance. As demonstrated by the [Bureau Of Meteorology \(BoM\)](#) an additional action of leadership could be:

*‘Commonwealth Departments will include as part of their annual reporting the safe movement of its workforce and fleet.’*

#### The need for more concrete actions to encourage and support organisations to take responsibility for road safety and create a road safety culture

The NRSPP agrees that it is important to “encourage and support organisations to take responsibility for road and vehicle safety across their operations”. While this could involve “taking actions and setting policies that support and enhance the individual responsibility of workers” we believe the highest priority is for the organisations to create and sustain a culture of safety in relation to road safety. Workplace road safety is unlikely to be optimised if the focus is on promoting responsibility of the individual worker. Research has established that effective management creates a culture where safety is valued and prioritised; thus, organisations need to take responsibility and regulators/government bodies need to support employers through providing adequate education and risk management tools. This approach will have a flow on effect to the individual drivers.

It also needs to be recognised that establishing a strong road safety culture within an organisation takes time and careful planning. As illustrated in the figure below taken from the [NRSP Grey Fleet Safety Management Guide](#), organisations typically pass through various stages as its safety culture matures. Hence, the aim should be to encourage organisations to take a long-term perspective to the development and maintenance of its safety culture, through a process of continual improvement.



|             | Emerging  | Managing   | Involving  | Cooperating  | Continually Improving   |
|-------------|---|--|--|--|---|
| Description | Adequate safety systems in place but lack of safety culture, poor prioritising of work driving safety and safety behaviours cause incidents. Incidents are seen as unavoidable and safety is defined as aiming to meet regulations. | Safety is defined as adhering to rules and regulations, policies and procedures. Incidents are viewed as deviations from the rules and preventable. Action is reactionary and only occurs after an incident. | Safety begins to move away from a top-down approach. Employees are willing to work with management to improve the safety of the organisation. Most employees take responsibility for their own safety. | Employees recognise management decisions can influence safety. Employees accept responsibility for their safety and that of others. Through near miss reporting, incidents can be prevented proactively. | All members of the organisation actively participate in managing safety. Injury prevention is a core value and the organisation has not had a recent incident and strives for continuing improvement. |

Source: Figure 5: Safety maturity curve for Grey Fleet management

Therefore, the NRSP suggest that more specific actions are included in the Draft Strategy and/or Action Plans designed to highlight and reinforce the responsibility that employers have for managing the safety of their drivers and the need to adopt a long-term perspective to developing a mature road safety culture. Examples of such actions include:

*‘Encourage and support organisations to take responsibility for road and vehicle safety across their operations by developing a workplace road safety strategy, securing resourcing and identifying what actions and setting policies that can be implemented in the short, medium and long term and how they will be measured and reported.’*

*‘Public, private and government organisations publicly report key workplace road safety measures as part of their annual reporting.’*

### The need to establish a regulatory framework for managing the risks faced by gig economy workers

The NRSPP believes that there is reductionist thinking embedded within the following action, which is contrary to the adoption of the social model:

*'With the increase in cycling and other vulnerable road users including through 'gig economy' delivery work, support the safety of delivery workers for example by provision of separated bike lanes.'*

There are growing concerns across society about the poor regulation of gig economy workers. This is partly due to the fact that it is unclear the risks these workers are facing and the lack of controls in place to manage these risks at both a regulatory and workplace level. An alternative to this action could be to establish the regulatory framework for managing risk controls of gig economy workers before focusing on discrete and targeted solutions like bike lanes.

To illustrate, in the UK Health and Safety Legislation already enables enforcement agencies and courts to look beyond the 'self-employment' label and consider the way the employment relationship operates. Recent work by TRL's Victoria Pyta and Dr Neale Kinnear is similarly exploring this area and the strategy should consider working with countries with similar regulatory systems in undertaking coordinated approach.

### The need to enhance construction related road safety

It is encouraging that the following action has been included within the Heavy Vehicle Safety priority area highlighting the issue of construction safety:

*'Protect all road users from conflicts with construction vehicles through state/territory government construction contract requirements such as requiring inclusion of safety technologies.'*

However, we believe there is scope to strengthen this action by linking it to recent developments in this area being led by the NRSPP. Since 2015, the NRSPP has been leading the adaption of Transport for London (TfL)'s Construction Logistics and Community Safety (CLOCS) program to Australia. The NRSPP recognised both the opportunity and impact that the projected major transport infrastructure project builds represented with regards to heavy vehicle safety and the risk they pose to vulnerable road users (VRU) since most of these projects are in the hearts of our major cities. The NRSPP has built a strong relationship with TfL which was first formalised in a Memorandum of Understanding in 2018.

TfL introduced CLOCS because it had a similar problem with heavy vehicle and VRU related fatalities as currently experienced within Australia and deemed the number unacceptable. TfL undertook a leadership position because they realised that they, like Australia, had a unique opportunity to utilise Europe's largest infrastructure construction project, the €55 billion Cross Rail Project, to creating lasting change in the heavy vehicle construction sector. However, to be successful they had to be innovative and collaborative by working with industry and key stakeholders to develop what became the CLOCS.

The result has been the development of the world's best practice approach to managing a major construction infrastructure project and related heavy vehicle logistics in the heart of London. The standards apply to not only the logistics but heavy vehicle safety technology and driver training to protect VRUs. CLOCS also engages the public to make them aware of how to safely interact with heavy vehicles.

TfL highlighted to NRSPP that the benefits of CLOCS in the UK included:

- [47% reduction in fatal and serious crashes between heavy vehicles and VRUs](#)
- [37% fewer complaints](#)
- [25% drop in total collisions](#)
- [76% less likely to commit licensing offences](#)

CLOCS has since become the single standard in relation to any major construction project across the United Kingdom. This has resulted in industry having certainty to invest in safety technology that will allow them to be able to access potential major contracts for consistent and reliable work. TfL as an organisation requires continual improvement in safety so the CLOCS standard like ANCAP is always evolving and improving safety and guided by industry leaders.

NRSPP has continued to champion that adaption of CLOCS to Australia known as CLOCS-A and has recently established a [Memorandum of Understanding](#) which includes a Steering Group of Amy Gillett Foundation, ARTSA Institute (ARTSA-i), Australian Trucking Association, Major Transport Infrastructure Authority, Monash University Accident Research Centre, Transport for NSW, Sydney Metro, Transport for London, Truck Industry Council and Road Safety Victoria and currently eight Supporting Partners.

Based on the above developments, we would suggest a stronger (or additional) action be included in the Draft Strategy, such as:

*“All Government Funding allocated to major infrastructure projects should be conditional on the inclusion of the contract standards that protect all road users during its construction. The standards should draw on world’s best practice and include elements such as heavy vehicle technology, driver training, logistics planning and community education in relation to all construction vehicles.”*

Examples already exists where Commonwealth contract policy has driven safety standards in organisations. Any contract that services the Defence Force requires a zero-tolerance drug and alcohol policy. There are several organisations that the NRSPP is aware of that have developed best practice alcohol and other drugs (AOD) policies in response to these contract requirements.

### *The need to acknowledge and address suicide in the road system*

The NRSPP believes that consideration should be given to including an action within the Draft Strategy focusing on the issue of suicide in the road system. The greater recognition of this issue in the road safety domain would align Australia with Sweden, which is generally recognised as one of the world’s leaders in road safety. Sweden formally identified suicide in road safety first in 2010 when it started including it in its reporting. In 2012, a specific method for identifying suicides was adopted in Sweden, which confirmed that they represented [approximately 10 per cent of road deaths. The most recent data from 2018 indicated there were 34 road deaths in Sweden that were classified as suicide.](#)

Since 2018, the NRSPP has been leading a collaborative project funded by Austroads exploring Suicide in Road Transport (SiRT) in Australia. The project involves nearly 100 partners and originated following research by Toll Group on their road fatality data identifying third party suicides on the road network as a major issue for their organisation. Currently little is known about the numbers, trends, location or scale of suicides on Australia’s road system because the data is not collected or reported on.

Since a key enabling action within the Draft Strategy is data, consideration should be given to adopting a process similar to that used in Sweden for identifying suicides within the road fatality data. More

particularly, the NRSP recommends that relevant actions be included in the National Road Safety Strategy and related Action Plans, which are informed by the following considerations:

- Mindframe guidelines should be used for industry, media, government and internal communications;
- There is a need to align data collection and recording processes with the national database (such as NCIS) for the reporting structure as a best preferred mechanism;
- The reporting of suicide in transport data be undertaken on an annual basis and disseminated in conjunction with reporting of road safety data;
- There is need to investigate infrastructure design and locations in conjunction with standardised contraction protocols to ascertain potential contributing factors between suicide and locations; and
- There is a need to provide opportunities to share insights into near miss events which can improve knowledge, increase awareness along with skill development of risk identification and future prevention.

As noted above, due to the sensitivity of this topic all language and communications relating to suicide in the road transport system should be based on the Mindframe guidelines and principles, which are referenced in Appendix 1 along with other project information pertaining to data and interventions.

## **Closing comments**

The NRSP thanks the Office of Road Safety for the opportunity to comment on the Draft National Road Safety Strategy. The preparation of the NRSP submission has been a collaborative effort involving Prof. Barry Watson, NRSP's Independent Chair, NRSP's Program Director Jerome Carslake and Ass. Prof. Sharon Newnan, who is the MUARC expert on workplace road safety and host organisation representative on the NRSP Steering Committee and Governance Board. The submission draws on insights from its many partners and learnings over the past six years in delivering the program.

Please don't hesitate to contact myself on 0490 752 971 or Jerome Carslake on 0429 009 998 for further information.

Yours sincerely

A solid black rectangular box used to redact the signature of Prof. Barry Watson.

Prof. Barry Watson  
Independent Chair of NRSP Steering Committee

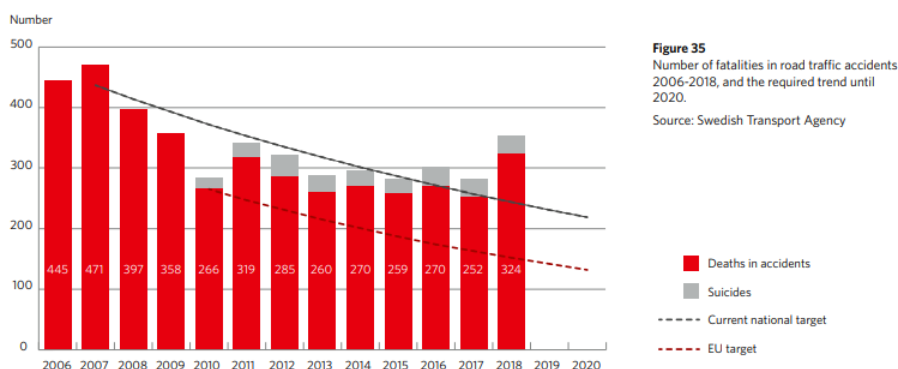


## Appendix 1: Suicide in Road Transport

In 2018 Toll Group (Toll) shared [ten years' worth of data relating to road fatalities involving their vehicles](#) with the NRSPP Steering Committee. Toll made the point they have a Vision Zero and to achieve that target they cannot do it alone. A key concern to Toll was the number of people using the road system for a mechanism for suicide which was not being recognised nor reported. Suicide which occur within the road system works contrary to the Safe Systems as these are people who are deliberately making mistakes.

It was from this research that Austroads and NRSPP established the project SAG6224 Suicide in Road Transport (SiRT) and the diverse multi-disciplinary National Working Group (NWG) to help underpin it which consists of nearly 100 different partners. Suicide is not traditionally part of the road safety domain and as a result the project looked to other impacted sectors like rail and construction and to leading health sector experts from this area to inform the project.

SiRT also looked internationally for other examples of countries that are addressing suicide in the road system and the only two which emerged were Sweden and the UK. Interestingly, both are recognised as global leaders in road safety and striving towards Vision Zero. Sweden in particular has identified suicide as an area captured by and reported as part road safety related trauma since 2010. However, an established method has been in use since 2012 (Swedish Transport Administration, 2014), and [it shows that suicides represent approximately 10 per cent of road deaths. In 2018 there were 34 road deaths that were classified as suicide; 4 additional individuals were killed in these accidents.](#) Sweden also acknowledges based on the trend data it is likely to miss its 2020 reduction target.



Prior to SiRT within Australia only limited research has ever looked into this suicides in the road system which last occurred in [2003 by MUARC](#). Only now is the problem being explored in detail thanks to industry, in particular Toll Group raising it as an issue they need help dealing with.

On 16 March SiRT held the closing all-stream workshop where the various stream leaders presented their research and recommendations. Whilst the project is yet to be finalised the following are key recommendations proposed and should be considered in the National Road Safety Strategy. The project is proposed to be finalised by June and it is recommended that the Office of Road Safety work with Austroads and NRSPP to monitor and apply the recommendations should they evolve in the final stages of reporting:

- Language and Communication, led by Dr Elizabeth Patton of Mindframe
  - A series of key messages should be developed, these can be anchored off the core SiRT findings, and reviewed for adherence to the Mindframe guidelines. Key messages that

include a 'call to action' (or clear steps or actions for the public to take) are more likely to be memorable and effective.

- Proactive engagement with the media or communities may involve a range of activities, including events, briefings, press releases, social media and other communication collateral. It is important that the Mindframe guidelines are considered across this range of activity
- Mindframe guidelines be used for industry, media, government and internal communications.
- If providing a lived experience perspective or contact, it is recommended that lived experience stories focus on this negative impact on others (e.g. impact of trauma on personal or working life) rather than a direct retelling of a suicide incident with details of method and location. Stories of hope and recovery (e.g. a person overcoming a suicidal crisis, how a person sought help to deal with a mental illness) are also recommended.
- Mindframe recommends the development of help-seeking cards specific to the road transport industry. Targeted support service information has the potential to increase help-seeking behaviour where people feel that services and information reflect an aspect of their identity (gender, occupation, sexuality, age, etc.), are region-specific or focus on a specific issue.
- Data, led by Dr Darren Wishart of Griffith University
  - A universal form of data gathering must be considered across agencies.
  - Align data collection and recording processes with the national database (such as NCIS) for the reporting structure as a best preferred mechanism.
  - A standard approach and data protocol while generating reports by all authorities in this sector.
  - State and national transport authorities include reporting of suicide in road safety statistics.
  - Reporting of suicide in transport data be undertaken on an annual basis and disseminated in conjunction with reporting of road safety data.
  - Establish standardise procedures and protocols to ensure that infrastructure design and locations consider suicide risk assessments in construction
  - Investigate infrastructure design and locations in conjunction with standardised contraction protocols to ascertain potential contributing factors between suicide and locations
  - Providing opportunities to share insights into near miss events which can improve knowledge, increase awareness along with skill development of risk identification and future prevention.
- Interventions, led by Dr Darren Wishart of Griffith University
  - Due to lack of robust data - present-day initiatives are broad in nature and do not specifically address the issue of suicide in road transport, particularly from a mental health perspective.
  - Develop an integrated approach in collating and analysing initiatives.
  - Develop education and promotional strategies to increase awareness of useability of readily available mental health resources.
  - Government and Non-Government stakeholder's collaboration.
  - Integration of self-care awareness and strategies need to be adopted within the broader road safety environment.

- Standardised approach and framework be considered and developed to integrate the risk management protocols for road safety construction to ensure that future suicide risk and prevention has been considered in the planning stage of any road infrastructure development.
- Impacts of SiRT on Third Parties, led by Dr Kim Hassall of Chartered Institute for Logistics and Transport Australia and University of Melbourne
  - Adopt a systematic approach to risk management–this includes having processes to monitor exposure to trauma-consider screening for PTSD and other mental health issues that may arise from exposure to trauma. (Counselling should now be part of the workplace}
  - Develop and implement mental health and wellbeing strategies to ensure front line workers have access such programs that deliver such appropriate support services
  - Develop a workplace pro-active leadership culture/capability to support timely access to non-time restricted counselling
  - Educate and prepare your workforce-to deal with, when exposed to, both fatalities and suicides occurring within their field of expertise
  - The stigma of suicide touches many professionals as well as families and friends. How to dilute the social stigma of a suicide needs an expanded field of development.
- Barriers to Interventions, led by Dr Stuart of Griffith University Australian Institute for Suicide Research and Prevention
  - Develop synergies with and harness existing momentum in developing and implementing evidence-based suicide prevention interventions in the suicide prevention sector and making car safety features mandatory in the vehicle safety features field.
  - Adopt a multi-level, social-ecological view of suicide prevention in road transport, requiring input at multiple levels, particularly from those in the aforementioned fields.

As there is currently no ownership of suicide in the road system it is recommended that this strategy begin incorporating it into road safety, seek to understand the issue, establish a process for consistently identifying suicides and how to report on it. Naturally once measured interventions which will naturally follow which should focus on preventive, during and post event.

The during and post interventions should be captured within the post-crash care pillar and extend not only to the physical support and rebuilding but to the mental as well.