

# DRAFT AUSTRALIAN WORK HEALTH AND SAFETY STRATEGY 2012–2022

## PUBLIC COMMENT COVER SHEET

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<b>More information</b>	See the draft Australian Work Health and Safety 2012-2022 Strategy - <a href="#">Frequently Asked Questions</a> for more information

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<b>Individual OR Organisation's name:</b>	Australasian College of Road Safety and 33900, The Australian Road Safety Collaboration	
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# AUSTRALASIAN COLLEGE OF ROAD SAFETY

ABN: 12 841 412 581

*Patron: Her Excellency Ms Quentin Bryce AC  
Governor-General of the Commonwealth of Australia*

**Submission from:**

**Australasian College of Road Safety**  
PO Box 198  
MAWSON ACT 2607

**and**

**33900, The Australian Road Safety Collaboration**  
Brett Hughes: [brett.hughes@curtin.edu.au](mailto:brett.hughes@curtin.edu.au)  
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**and Partners** (listed over)

**To:**

Safe Work Australia  
[AustralianStrategy@safeworkaustralia.gov.au](mailto:AustralianStrategy@safeworkaustralia.gov.au)

**Date:** 17 May 2012

**Re: Draft Australian Work Health and Safety Strategy 2012–2022**

The Australasian College of Road Safety (ACRS) and 33900, The Australian Road Safety Collaboration are pleased to be able to make this submission to Safe Work Australia on the Draft Australian Work Health and Safety Strategy 2012–2022. This submission is supported by all of the individual organisations noted overleaf.

**Road safety is the greatest threat to human life in workplaces, resulting in the deaths of around 450 Australians in the course of their work every year.** It is therefore tragic and completely unacceptable if this issue and catastrophic human cost goes unrecognised in the Australian Work Health and Safety Strategy.

While the strategy itself is not unsound, neither is it sufficiently robust to ensure that workplace health and safety generally will significantly improve. The strategy needs to include more concrete activities to be effective. Specifically, the following actions are urgently required to improve workplace road safety:

- 1) **Commission a Productivity Commission Inquiry into the costs of road safety and the benefits of the full range of countermeasures and responsibilities.**
- 2) **Safe Work Australia includes workplace road safety in the Australian Work Health and Safety Strategy 2012–2022 and every model code of practice.**
- 3) **Safe Work Australia prepares a specific model code of practice for road safety in workplaces.**
- 4) **Safe Work Australia and all workplace safety regulators include road crash data in workplace safety data.**
- 5) **Safe Work Australia commission analysis of the costs of road safety covering each State and industry sector, different crash types, and the beneficiaries and contributors.**
- 6) **Safe Work Australia and all workplace safety regulators promote and apply the forthcoming ISO39001 Standard for Road Traffic Safety Management Systems Standard.**

Safe Work Australia, other workplace safety regulators and all Australian governments must lead by being totally committed to saving the lives of Australians on our roads while at work.

Yours sincerely,

**ACRS President**  
Lauchlan McIntosh AM

**33,900 Convenor**  
Eric Howard

This submission is made jointly on behalf of the following organisations.

**Australasian College of Road Safety  
(on behalf of 68 member organisations & 280 individual members)**

PO Box 198  
Mawson ACT 2607

**33900, The Australian Road Safety Collaboration**

33,900 Contacts:

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School of Public Health, Curtin University  
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**International Road Assessment Programme (iRAP)**

300 St Pauls Terrace  
Fortitude Valley, QLD 4006  
[www.irap.org](http://www.irap.org)

**Centre for Accident Research and Road Safety – Queensland (CARRS-Q)**

Queensland University of Technology  
130 Victoria Park Road  
Kelvin Grove 4059

**Transport and Road Safety (TARS) Research,**

The University of New South Wales (UNSW)  
West Wing, 1st Floor, Old Main Building (K15)  
UNSW Sydney, NSW 2052

**Centre for Automotive Safety Research (CASR)**

The University of Adelaide  
Adelaide SA 5005

## Submission

### 1. Why is road safety an issue for workplaces?

- Road crashes are the biggest threat to life in Australian workplaces.
- Road and vehicle related crashes are the leading cause of death and injury in the workplace.
- Road crashes can and do impact nearly all workers and many others.
- Workers driving on public roads in work time are in work places and covered by all workplace safety legislation and requirements.
- Despite apparently common views, road safety in the workplace isn't just an issue for the road transport industry (i.e. trucks).
- Road related deaths and injuries impact directly on national and firm productivity

In the report *Work-Related Traumatic Injury Fatalities, Australia 2008–09*, Safe Work Australia, summarises:

- there were 444 work related traumatic injury fatalities;
- traffic incidents on public roads resulted in 100 fatalities, 35% of the total;
- further fatalities were caused moving vehicles in workplaces;
- one in five of those fatally injured while working in 2008–09 worked as a truck driver (59 deaths) with truck drivers recording a fatality rate fourteen times the all occupations rate
- road freight transport was the equal highest industry (44 deaths);
- the Road freight transport industry fatality rate was ten times the all industries average

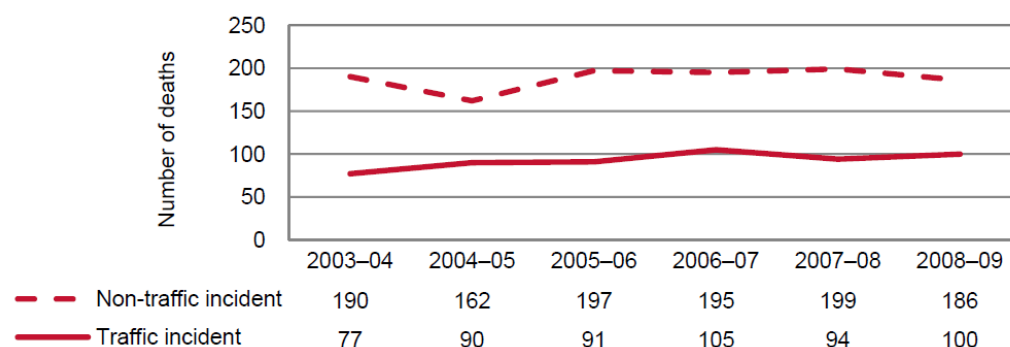
However, these damning statistics **substantially under represent** the financial and human cost of workplace road safety in Australia due to systematic underreporting.

Indications are that:

- probably at least 30-40% of all road deaths or **450 deaths annually on our roads are in workplaces (i.e. vehicles)**;
- moving vehicles are the leading cause of reported death (42% of all deaths);
- the total cost might be in the order of \$10 billion per annum to Australia as a whole; and
- the workplace safety reports are underestimates due to the way data is collected.
- Reported fatality and injuries are not decreasing.

The chart from Safe Work Australia's report *Work-Related Traumatic Injury Fatalities, Australia 2008–09* shows that recorded workplace road crashes are increasing in frequency and proportion.

**Figure 8 Working fatalities: number by traffic incident status, Australia, 2003–04 to 2008–09**



In relation to workers compensation fatality claims alone, vehicle accidents are the most likely mechanism of injury, in fact nearly **four times higher** than the next most common mechanism of injury.

Research has demonstrated that work-related drivers on average report a higher level of crash involvement compared to personal car drivers, and road crashes are the most common form of work related fatalities. Work related road crash injuries are also approximately twice as likely to result in death or permanent disability as other workplace injuries and the average time lost due to injury is greater than any other workplace claim.

Road safety has risen around the world has risen in prominence as an issue. Road crashes are a leading cause of death resulting in around 1,000,000 deaths per year, many of them innocent young people in developing countries. Consequently the United Nations proclaimed 2011-2020 as the global Decade of Action for Road Safety (<http://www.un.org/News/Press/docs/2010/ga10920.doc>).

## 2. Joint responsibility for all workplaces

Employers, whether government, transport industry, business, trade, mining, primary industry, not for profit, or any other group have a principal responsibility for ensuring a safe working environment for their workers and anyone else who may be in contact with their business.

Governments have a special role in regulating to ensure workplaces are safe. While the legislation clearly covers workers driving during work, it is not evident that regulators practice enforcement in this area. For instance, most regulators websites have considerable information on many workplace hazards, but scant information on road safety, despite its widespread nature and fatal consequences. There is a distinct lack of attention to the issue of work related road safety, other than the heavy vehicle sector, which is generally covered by transport regulation, rather than workplace safety.

It has been estimated that in Australia approximately 75% of all locally produced passenger vehicles are purchased as fleet vehicles and more than half of all new vehicle registrations annually consist of fleet vehicles. So potentially the majority of vehicles on our roads may be used for work purposes during their life. Consequently, fleet purchasing policy and practice is crucial for road safety. Research has shown occupant protection and collision avoidance technologies do reduce crashes and injury rates significantly. The Federal Government has mandated a vehicle purchasing policy of 5 star ANCAP safety rating minimum for personal vehicles and four star for light commercial vehicles. No employer should do less.

While it is apparently not widely understood, workplaces have a responsibility for the safety of others affected by their activities. This means that while driving during work, workers and their employers have a responsibility for the safety of others on the road and if they are involved in a motor vehicle crash.

## 3. Workplace safety data ignores road safety

The Safe Work Australia data is biased for two reasons:

1. The data is sourced from workplace insurance claims, which **exclude** motor vehicle crashes and injuries in most states which are in the motor accident insurance claim system. Injuries and deaths to workers and others from vehicle related crashes are obscured in state third party insurers claims and potentially not compared with businesses who carry self-insured worker's compensation.
2. Workplace safety tends to focus on accident frequency rather than severity.

Therefore the full consequences of workplace road safety are hidden. Therefore workplace safety policy ignores the issue or responds inadequately.

Most organisations only record incidents involving vehicles as per insurance claims, which under-reports incidents. Furthermore, organisations utilise this data to inform their decision making processes and this type of data lacks information relating to contributing factors to crashes. Therefore, use of this type of data aims to manage the asset in contrast to managing risks or outcomes, including personal effects on workers such as death and injury.

Work related road safety risk management is more often occurs reactively, as against proactively, in two ways. Organisations manage the risk post incident, and also use the frequency of crashes as the score card. However, this reactive process is inconsistent with any other risk management processes in the workplace. It is possible that this occurs due to the need to manage more likely events (e.g. slips, trips and falls), despite their low severity, as opposed to the more occasional car crashes, even though these are much likely to be more severe. Injuries to workers and others from vehicle related crashes are obscured in state third party insurers claims and potentially not compared with businesses who carry self-insured worker's compensation.

#### **4. Work safety policy and regulation ignores road safety**

Workplace safety is generally covered under specific industries (e.g. manufacturing), types of work (e.g. electrical) or specific risks (e.g. hazardous materials) or individual professions (e.g. plumbing). Road safety represents the antithesis of these perspectives. It applies to nearly all industries, most types of work indirectly, many specific risks indirectly and all professions.

While health and safety legislation clearly encompasses driving for the purpose of work, there is no substantial evidence that government regulators practice enforcement in the area of work-related road safety.

Along with a lack of sufficient enforcement there is little supporting information relating to the work-related driving hazard. For example, there are numerous Codes of Practice relating to other specific health and safety hazards (e.g., confined spaces, manual tasks, hazardous chemicals, etc), however, no code of practice for work-related road safety. Although work-related road fatalities account for almost half of all work-related fatalities, driving for work exhibits the least attention. In addition, although driving for work applies to most industries and indirectly to most types of work, it is not addressed sufficiently within legislative requirements and supporting documentation and information. For example, the draft Australian Work Health and Safety Strategy 2012-22 does not recognise work-related road safety as a major issue or priority, except in the instance of the transport industry.

A higher fatality/injury reduction target could be achieved if work-related road safety was given more attention given the proportion of fatalities and injuries related to vehicle incidents. Basic road and vehicle infrastructure, just as any other workplace infrastructure can be assessed for hazards and where necessary action taken to ameliorate those hazards. Vehicle purchasing policy to specify minimum ANCAP ratings is one important area where action is beginning to occur and some firms are working with road authorities to assist in road safety upgrades.

However, road safety is not generally included in most workplace, safety strategy, policy and regulation. For instance, the National OHS Strategy 2002-2012 does not recognise road safety as a major issue or priority and only recognises road safety for the transport industry. A National Trauma Register is an overarching means of assessing Pre- Hospital Response and Care, Emergency Management, Emergency Surgery, Reconstructive Surgery and Rehabilitation of Road Trauma and

other patients. This enables benchmarking between Hospitals, States and Internationally to gain evidence-based Best Practice

Skills Australia, the independent statutory body, providing advice to the federal Government on Australia's current, emerging and future workforce skills and development needs believes that road safety is critical to all Australians, and that the financial and emotional costs certainly warrant attention and action. Skills Australia believes the issue also needs to be addressed by relevant industry skills councils. No action has yet commenced.

To enable increased enforcement of work-related road safety, government statutory authorities should consider training or recruiting and appointing WH&S inspectors familiar and experienced with work-related road safety. Currently inspectors have experience and qualifications in electrical, construction, ergonomics, etc but lack dedicated work-related road safety specialists, which potentially explains a lack of consideration in this area.

## 5. Workplace road safety is good business

The costs to business of workplace road crashes is enormous. While there is not good data available, indications are that the cost of road crashes in Australia during work time is in the order of \$10 billion every year (based on 30% of the updated \$27bn National Road Safety Strategy estimate of national costs of road trauma in 2006 from BITRE 2009).

A crucial issue for achieving safety outcomes is organisational leadership, originating from management, not delegated and therefore diluted, as summarised by the draft ISO39001 Standard for Road Traffic Safety Management Systems Standard "*Persons in top management and other relevant management roles throughout the organization shall demonstrate leadership with respect to the RTS management system*". Executive commitment is required to provide resources and priority for the essential processes, activities and functions to achieve safety objective.

There are three key areas for transport safety in the workplace:

- the transport, storage and logistics industry where transport is a principal component;
- any workplace, since transport occurs in almost all industries, businesses and enterprises; and
- transport outside the workplace, where effects occur to operations, such as staff off work.

The first of these may be recognised by employers, but the efforts to improve tend to occur in transport agencies and operators, rather than workplace safety agencies. The second has been gaining recognition in road safety policy, but is almost completely ignored by workplace safety agencies and industry as a whole. The third is generally not an issue for workplace safety agencies, but is generally ignored by industry as a whole despite the costs and consequences which occur to businesses.

The impacts of road crashes in the work place are diverse (ERSO 2009) and include:

- *Severe health loss*: Work-related motor vehicle crashes are a leading cause of death in the workplace in industrialized countries.
- *Higher risks*: Professional driving is a highly hazardous activity, involving far higher risks than those encountered in virtually any other occupation or most other activities of daily life.
- *High costs*: The costs of work-related crashes are high both for society and employers.

Substantial direct financial benefits to business, the economy, and hence society can accrue if road safety is improved. Therefore it makes sense for businesses to improve transport safety in their operations.



The results of workplace road safety strategies have been identified from practical experience:

- reduced stress and trauma to staff and their families;
- increased morale and improved productivity;
- increasing staff availability for work;
- reduced vehicle damage and work rescheduling;
- reduced administration and HSE / OSH management;
- improved logistics management and potentially environmental outcomes;
- increased vehicle availability;
- reduced business and customer interruptions;
- reductions in vehicle and workers' compensation insurance premiums;
- lower repair, maintenance and running costs; and
- increased resale value from improved care of vehicles by drivers.

## 6. Workplace road safety solutions are known

Road safety policy is based on the 'Safe Systems' approach to improving road safety, recognised globally and adopted in Australia (National Road Safety Strategy and others). Available information suggests that the following general responses are likely to be required to properly manage road safety in and by workplaces:

- workplace vision and road safety policy;
- organisation and structure;
- management systems and information;
- staff performance management;
- risk management (identification, assessment, mitigation and monitoring);
- risk identification, elimination or reduction, incident response;
- recruitment and selection;
- induction programs;
- fleet selection and maintenance;
- road infrastructure and traffic management improvements;
- incentives and disincentives; and
- training and education.

These issues are part of the content proposed for inclusion in the proposed ISO39001 Standard for Road Traffic Safety Management Systems Standard currently being drafted and available for public comment. Extracts from this draft standard are attached for information. The introduction to this draft standard is particularly informative:

*This International Standard identifies elements of good RTS management practice that will enable the organization to achieve its desired RTS results.*

*This International Standard is applicable to public and private organizations that interact with the road traffic system. It can be used by internal and external parties, including certification bodies, to assess the organization's ability to meet the requirements.*

*Experience from around the world has shown that large reductions in death and serious injury can be achieved through the adoption of a holistic Safe System approach to RTS. This involves a clear and unequivocal focus on RTS results and evidence-based actions, supported by appropriate organizational management capacity.*

This standard is proposed to cover:

- employees' use of the road transport system;
- goods and passenger transport in the road traffic system;
- major generation of traffic flow; and
- service delivery and products for the road traffic system.



Safe Work Australia must prepare a specific model code for road safety in workplaces covering these issues. However as an initial priority, the model code must focus on:

- road safety explicitly included in every workplace safety policy,
- full risk management (identification, assessment, mitigation and monitoring) of road safety risks (including roads, traffic, route selection, skills, regulations);
- purchasing and using ANCAP 5 star crash rated vehicles as much as possible;
- training and education for all drivers who drive on unsealed roads or in 4WD's;
- fatigue management for travel on work purposes;
- fatigue management for travel to and from work where affected by work practice; (such as drive-in-drive-out);
- road safety included in induction programs
- assessing and encouraging early introduction of safety assist technologies and monitoring equipment;
- encouraging road designers and infrastructure providers to build safe road infrastructure and eliminate high risk one or two star roads;
- encouraging and investing in hazard reduction including road safety innovation, research and training in all areas.

This code must form the basis of further action by regulators.

Road safety is, and must be based on evidence. The draft ISO39001 Standard for Road Traffic Safety Management Systems Standard includes the requirements to *"Rely on strong economic analyses to understand the scale of the trauma problem, and direct investment into those programmes and locations where the greatest potential benefit to society exists."*

## 7. More information and policy development is needed

If this issue is to be addressed we need an evidence base including:

- understanding and providing the motivation for change (why businesses, government, individuals or others would act);
- justification for action (extent of the problem);
- identified focus (e.g. industries, locations, types of crashes, causal factors); and
- proven worthwhile countermeasures (valuable, cost effective, practical, acceptable)

Information is urgently needed on:

- the size of the problem in Australia (costs and impacts of various types, crashes, fatalities, serious injuries);
- segregation or stratification (industries, States, regions);
- workplace crashes (locations, vehicle types, driver types, road types, conditions, etc.);
- causal factors (we can guess fatigue, distraction, etc as per usual, but there are likely to be other work related factors such as job stress, work time pressures, unfamiliar conditions, logistics, technology, etc.);
- potential for infrastructure investment to eliminate high risk roads and provide a positive contribution to workplace safety;
- who are the beneficiaries and who pays the costs, which is essential for proposing countermeasures as companies aren't likely to pay for benefits which don't accrue to them.

## 8. Recommendations

The following actions are urgently required to improve workplace safety:

- 1) **Commission a Productivity Commission Inquiry into the costs of road safety and the benefits of the full range of countermeasures and responsibilities.**
- 2) **Safe Work Australia includes workplace road safety in the Australian Work Health and Safety Strategy 2012–2022 every model code of practice.**
- 3) **Safe Work Australia prepares a specific model code of practice for road safety in workplaces.**
- 4) **Safe Work Australia and all workplace safety regulators include road crash data in workplace safety data.**
- 5) **Safe Work Australia commission analysis of the costs of road safety covering each State and industry sector, different crash types, and the beneficiaries and contributors.**
- 6) **Safe Work Australia and all workplace safety regulators promote and apply the forthcoming ISO39001 Standard for Road Traffic Safety Management Systems Standard.**

## 9. Further Information and References

*Workplace Transport Safety: The Mobile Financial Crisis*, Hughes B.P., SIA (WA) Conference, August 2010, <http://c-marc.curtin.edu.au>

*Work-Related Traumatic Injury Fatalities, Australia 2008–09*, Safe Work Australia, May 2011, <http://safeworkaustralia.gov.au>

*Road crash costs in Australia 2006, Report 118*, Bureau of Infrastructure, Transport and Regional Economics (BITRE), 2009, Canberra.

*Work-related road safety*, European Road Safety Observatory (ERSO), SafetyNet, 2009, [http://ec.europa.eu/transport/wcm/road\\_safety/erso/safetynet/content/safetynet.htm](http://ec.europa.eu/transport/wcm/road_safety/erso/safetynet/content/safetynet.htm)

*National Road Safety Strategy*, Australian Transport Council, May 2011, [www.atcouncil.gov.au](http://www.atcouncil.gov.au)

*Workplace Road Safety: Launch your own workplace vehicle safety campaign*, WA Office of Road Safety, [www.ors.wa.gov.au](http://www.ors.wa.gov.au), 2009

*A Corporate Approach to Transport Safety: Discussion Paper*, National Transport Commission, August 2011, [www.ntc.gov.au](http://www.ntc.gov.au)

*Assessment of Existing Approaches to Corporate Safety Management*, Mooren L., Newton J., Grzebieta R., Williamson A, March 2011, [www.ntc.gov.au](http://www.ntc.gov.au)

*Review of the automotive industry 2008, submission by the Australasian Fleet Managers Association to the Australian Government*. AFMA (2008). <http://www.afma.net.au/>

*Driving for work: A series of organisational audit results*. Wishart, D., Rowland, B. Freeman, J. Davey, J. (2011). Australasian College of Road Safety Conference, A Safe system making it happen. Melbourne.

*Improving fleet safety- Current approaches and best practice guidelines*. Haworth, N., Greig, K. & Wishart, D. (2008). Report prepared for Austroads Project SS1026.

*Integration of work related fleet safety within a Workplace Health and Safety Management System: A case study approach*. Rowland, B., Watson, B., Wishart, D. (2006). Australasian Road Safety Research Policing and Education Conference Gold Coast.



**Attachment - Relevant extracts from draft *ISO39001 Standard for Road Traffic Safety Management Systems Standard* available for public comment**

**Key Sections**

Based on the draft standards Contents, the key components are summarised below.

**Introduction**

This International Standard identifies elements of good RTS management practice that will enable the organization to achieve its desired RTS results.

This International Standard is applicable to public and private organizations that interact with the road traffic system. It can be used by internal and external parties, including certification bodies, to assess the organization's ability to meet the requirements.

Experience from around the world has shown that large reductions in death and serious injury can be achieved through the adoption of a holistic Safe System approach to RTS. This involves a clear and unequivocal focus on RTS results and evidence-based actions, supported by appropriate organizational management capacity.

The management system specified in this International Standard focuses the organization on its RTS targets and objectives and guides the planning of activities that will realise these goals by using a Safe System approach to RTS.

This International Standard specifies the requirements for a comprehensive RTS management system. This International Standard requires that the organization develops, implements and maintains procedures and processes as part of an RTS management system that can be integrated into the organization.

**1 Scope**

This International Standard specifies requirements for a road traffic safety (RTS) management system to enable an organization that interacts with the road traffic system to reduce death and serious injuries related to road traffic crashes. The requirements in this Standard include development and implementation of an appropriate RTS policy, development of objectives which take into account legal and other requirements to which the organization subscribes, and information about elements and criteria related to RTS that the organization identifies as those which it can control and those which it can influence.

This International Standard is applicable to any organization, regardless of type, size and product or service provided

**2 Normative references**

**3 Terms and definitions**

**4 Context of the organization**

The organization shall determine external and internal issues that are relevant to its purpose and that affect its ability to achieve the intended outcomes of its RTS management system.

These issues shall be taken into account when establishing, implementing, maintaining and improving the organization's RTS management system.

*4.1 Understanding of the organization and its context*

*4.2 Understanding the needs and expectations of interested parties*

*4.3 Determining the scope of the management system*

*4.4 RTS management system*

## **5 Leadership**

### *5.1 General*

Persons in top management and other relevant management roles throughout the organization shall demonstrate leadership with respect to the RTS management system

### *5.2 Management commitment*

### *5.3 Policy*

Top management shall establish an RTS policy

### *5.4 Organizational roles, responsibilities and authorities*

Top management shall ensure that the responsibilities and authorities for relevant roles are assigned and communicated within the organization.

Top management shall assign the responsibility and authority to a member(s) of the organization's management who, irrespective of their responsibilities, shall have the necessary competence, defined roles, responsibilities, accountabilities and level of authority

## **6 Planning**

The organization shall follow a process that reviews its current RTS performance, selects RTS performance factors to work on, analyses what it can achieve over time and sets appropriate objectives, RTS targets and plans to achieve them.

The review of current RTS performance shall take account of the context of the organization and its leadership, with particular reference to the processes, associated activities and functions of the organization that can have an impact on RTS. Current RTS performance shall be quantified where possible, and assessment made of likely future impacts in accordance with relevant RTS performance factors.

### *6.1 General*

### *6.2 Actions to address risks and opportunities*

### *6.3 RTS performance factors*

The organization shall identify for use those RTS performance factors, final safety outcome factors and intermediate safety outcome factors, depending on the context of the organization.

### *6.4 RTS objectives and plans to achieve them*

## **7 Support**

### *7.1 Coordination*

The organization shall coordinate with relevant levels and functions of the organization, other organizations and interested parties to realize the potential benefits from its actions. It shall ensure that there is sufficient internal and external consultation and coordination of its activities designed to achieve the established RTS objective(s).

### *7.2 Resources*

The organization shall determine and provide the resources and allocation framework needed for the RTS management system to achieve the established RTS objective(s).

### *7.3 Competence*

### *7.4 Awareness*

### *7.5 Communication and Promotion*

The organization shall determine the need for internal and external communications relevant to the RTS management system

*7.6 Documented information*

**8 Operation**

*8.1 Operational planning and control*

The organization shall determine, plan, implement and control those processes needed to address the risks and opportunities determined in 6.2 and to meet requirements.

The organization shall control planned changes and review the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary.

*8.2 Emergency preparedness and response*

**9 Performance Evaluation**

*9.1 Monitoring, measurement, analysis and evaluation*

*9.2 Road traffic crash and other incident investigation*

*9.3 Internal Audit*

*9.4 Management review*

**10 Improvement**

*10.1 Nonconformity and corrective action*

*10.2 Continual improvement*

**Safe System approach to Road Traffic Safety**

Several countries are currently using a Safe System approach in developing and implementing their RTS programmes. Sweden has developed a 'Vision Zero' approach, the Netherlands has developed a closely related 'Sustainable Safety' approach and New Zealand and several jurisdictions in Australia have established programs under the banner of Safe Systems. While the specific details vary, Safe

System approaches typically:

1. Have the long-term aim of eliminating traffic related deaths and serious injuries.
2. Aim to develop a road traffic system better able to accommodate human error. This is commonly achieved through better management of crash energy, so that no individual road user is exposed to crash forces likely to result in death or serious injury.
3. Incorporate many strategies for better management of crash forces, with a key strategy being road network improvements in conjunction with speed limits set, the latter set in response to the level of protection offered by the road infrastructure.
4. Rely on strong economic analyses to understand the scale of the trauma problem, and direct investment into those programmes and locations where the greatest potential benefit to society exists.
5. Are underpinned by comprehensive leadership, management and communication structures incorporating all key government agencies and other organizations which have a role in determining the safe functioning of the traffic system.
6. Align safety management decision making with broader societal decision making to meet economic goals and human and environmental health goals, and to create a commercial environment that generates demand for, and benefits the providers of, safe road traffic products and services.
7. Embrace the ethos of "shared responsibility" for RTS among the various actors of the road traffic system, such that there is a shared vision amongst citizens, public, private and not for profit organizations regarding the ultimate safety ambition, and how to achieve it.

These approaches are relevant to all public and private organizations that generate RTS impacts through their traffic related activities and help to define the dimensions of associated RTS management systems.



## Response Form

### About the Australian Work Health and Safety Strategy 2012–22

The Australian Work Health and Safety Strategy 2012–22 (the Strategy) has been designed to drive key national activities that:

- will improve the health and safety of all Australian workers, and
- support organisations to better prevent and manage workplace risks.

The Commonwealth, all state and territory governments, major peak employer organisations, worker representative groups, and other bodies all develop strategic plans to support improved work health and safety.

The activities which they each undertake under their strategic plans will support (and be supported by) the outcomes of the Strategy.

#### Notes:

- Please read the Strategy in full before commenting as the context in which the quoted sections occur and the interaction between various parts of the Strategy need to be taken into consideration.
- The explanatory notes and the text in the left hand column are intended to assist you in answering the questions; they do not form part of the Strategy and do not require comment.
- All direct quotes from the Strategy are in *italics*.
- If you only wish to comment on a particular part of the Strategy, you can click on one of the **LINKS** below to go direct to that page.
- Please either highlight your choices (e.g. **YES NO**) or delete the inapplicable option.

#### LINKS

[The purpose of the Strategy](#)

[The vision and principles](#)

[2022 outcomes](#)

[Targets](#)

[National industry priorities](#)

[Work related diseases and disorders](#)

[Action areas](#)

[Healthy and safe by design](#)

[Supply chains and networks](#)

[Work health and safety capabilities](#)

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## PURPOSE OF THE STRATEGY

### Explanatory Note

The purpose of the Australian Work Health and Safety Strategy is to drive key national activities to improve work health and safety.

It is aimed at national organisations – professional, industry and worker bodies; safety regulators and governments; and other peak bodies which in turn will influence everyday work and workplaces across Australia.

Detailed national activities will be developed by stakeholders as part of the implementation plans that will underlie and support the Strategy.

The Strategy is not designed to be applied directly to generating individual workplaces work health and safety plans. However managers may like to consider how concepts within the Strategy such as *'healthy and safe by design'* may be applied in their own workplaces.

### Purpose of the Strategy

Do you agree with this focus in the Strategy?

**NO**

### Comment:

**In addition to the general purpose, the Strategy must have clear direction with respect to specific issues.**

**One of the most important issues to be included is improving workplace road safety.**

**For more information, see the attached Submission.**

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## **THE VISION AND PRINCIPLES**

### **Explanatory Note**

The vision is the aspirational outcome of the Strategy.

The Strategy is underpinned by the principle that all workers, regardless of their occupation or how they are engaged, have the fundamental right to be free from the risk of work-related death, injury and illness, and the belief that healthy and safe work will allow Australians to have more productive working lives.

This is consistent with the United Nations' Universal Declaration of Human Rights and is reflected in duties of care established in all Australian work health and safety legislation.

#### **The vision of the Strategy is:**

*Healthy, safe and productive working lives.*

Does this vision capture the aspirations you believe should underpin the Australian Work Health and Safety Strategy?

**YES**

**Comment:**

#### **This vision is based on two key principles:**

*Workers have the fundamental right to be free from the risk of work-related death, injury and illness, and*

Should this principle be included in the draft Strategy?

**YES**

**Comment:**

*Healthy and safe work will allow Australians to have more productive working lives.*

Should this principle be included in the draft Strategy?

**YES**

**Comment:**

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## 2022 OUTCOMES

### Explanatory Note

Four high-level outcomes are to be achieved by 2022:

- reduced incidence of work-related death, injury and illness
- reduced exposure to hazards or risks causing work-related injury and illness
- improved quality of workplace controls, and
- improved work health and safety infrastructure.

The first outcome will be achieved through the other three. Reducing exposure to hazards, and improving the quality of workplace controls, will lead to a reduction in the incidence of work-related death, injury and illness.

**Note:** The Strategy proposes reductions of 20 per cent in work-related injury fatalities, and 30 per cent in work-related injuries by 2022. You will be asked to comment on these figures in the next section of these questions.

The 2022 Outcomes are not expressed in numeric terms but it is assumed that the reductions and improvements referred to in the 2022 Outcomes would be broadly consistent with the numeric targets.

<b>Reduced incidence of work-related death, injury and illness.</b>	Do you think this outcome would contribute to achieving the vision? <b>NO</b>
	Can a reduction be achieved within the time frame? <b>YES</b>
<b>Comment:</b> <p><b>The targets do not clearly distinguish severity and consequence. For instance many slips, trips and falls resulting in slight and temporary injury do not equate to one serious road crash with life changing and permanent consequences.</b></p> <p><b>The targets are achievable with best practice road safety successfully implemented in leading road safety countries internationally.</b></p> <p><b>Neither "reduced exposure", "improved quality of workplace controls" nor "improved work health and safety infrastructure" are outcomes and should be deleted. They are merely means to achieve improved safety.</b></p> <p><b>For more information, see the attached Submission.</b></p>	
<b>Reduced exposure to hazards or risks causing work-related injury and illness.</b>	Do you think this outcome would contribute to reducing the incidence of work-related death, injury and illness? <b>YES</b>
	Can a reduction be achieved within the time frame? <b>YES</b>
<b>Comment:</b> <p><b>This is a general statement which must be put into practice.</b></p> <p><b>Exposure to workplace road hazards must be included in regular safety, not ignored as it is at present.</b></p> <p><b>For more information, see the attached Submission.</b></p>	
<b>Improved quality of workplace controls.</b>	Do you think this outcome would contribute to reducing the incidence of work-related death, injury and illness? <b>YES</b>
	Can an improvement be achieved within the time frame?

	<b>YES</b>
<b>Comment:</b> <b>This is a general statement which must be put into practice.</b> <b>Workplace controls may be useful, but they will never be sufficient. A range of other road safety management activities are required, such as improved vehicles, organisational culture, incentives, regulation, enforcement, etc.</b> <b>For more information, see the attached Submission.</b>	
<b>Improved work health and safety infrastructure</b>	Do you think this outcome would contribute to reducing the incidence of work-related death, injury and illness? <b>YES</b>
	Can an improvement be achieved within the time frame? <b>Yes</b>
<b>Comment:</b> <b>This is a general statement which must be put into practice.</b> <b>Infrastructure must include safer vehicles and included in regular safety, not ignored as it is at present.</b> <b>The targets are achievable with best practice road safety successfully implemented in leading road safety countries internationally.</b> <b>For more information, see the attached Submission.</b>  <a href="#">Back to Links</a> <a href="#">Next Page</a>	

## **TARGETS AND PRIORITIES**

### **Explanatory Note**

The Strategy includes national targets and performance indicators which will be used to monitor the success of national actions to meet the 2022 Outcomes.

Targets will be developed and implemented by 2015.

### **Work-Related Fatalities Targets:**

The Strategy includes a target of a 20 per cent reduction in the number of injury fatalities.

[More information on injury fatalities.](#)

Do you think a 20 per cent reduction is:

- ~~About right~~
- Too low
- ~~Too high~~
- ~~Irrelevant, we shouldn't have numeric targets~~
- ~~Other (please explain).~~

### **Comment:**

**International experience indicates that a 40% reduction in road safety outcomes is achievable with best practice road safety successfully implemented in leading road safety countries internationally.**

**For more information, see the attached Submission.**

### **Work-Related Injuries Targets:**

The Strategy includes a target of a 30 per cent reduction in incidence rates of all claims resulting in one or more weeks off work.

[More information on incidence rates](#)

Do you think a 30 per cent reduction is:

- ~~About right~~
- Too low
- ~~Too high~~
- ~~Irrelevant, we shouldn't have numeric targets~~
- ~~Other (please explain).~~

### **Comment:**

**International experience indicates that a 40% reduction in road safety outcomes is achievable with best practice road safety successfully implemented in leading road safety countries internationally.**

**For more information, see the attached Submission.**

### **Body stressing Injuries Targets:**

The Strategy includes a target of a 30 per cent reduction in the incidence rate\* of claims resulting in one or more weeks off work due to body stressing.

[More information on body stressing](#)

[More information on incidence rates](#)

Do you think a 30 per cent reduction is:

- ~~About right~~
- Too low
- ~~Too high~~
- ~~Irrelevant, we shouldn't have numeric targets~~
- ~~Other (please explain).~~

### **Comment:**

**International experience indicates that a 40% reduction in road safety outcomes is achievable with best practice road safety successfully implemented in leading road safety countries internationally.**

**For more information, see the attached Submission.**

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## **NATIONAL INDUSTRY PRIORITIES**

### **Explanatory Note**

The national industry priorities will focus activities and attention on those which contribute to the highest death, injury and illness to workers.

Sub sectors will be chosen from within these industries for three year periods during the life of the Strategy. This will be done during the development of the implementation plans.

### **National Industry Priorities**

The following broad industry groups have been identified as priorities for the reduction of the incidence of traumatic fatalities, injuries and illnesses by 2015

- Agriculture

Please indicate whether you agree that the following industries should be considered priorities:

### **Comment**

- Transport

**YES**

### **Comment**

- Manufacturing

### **Comment**

- Construction

### **Comment**

- Health

### **Comment**

**All industries need to improve road safety in their workplaces.**

**Road safety is not just a transport industry' issue.**

**Virtually all industries involve transport, including general passenger vehicle use, not just trucks.**

**Compartmentalising safety into individual industries conceals the fact that road safety is an issue in nearly every industry sector.**

**Every industry should include workplace road safety amongst the highest priorities.**

**For more information, see the attached Submission.**

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## WORK RELATED DISEASES AND DISORDERS

### Explanatory Note

To focus national prevention efforts, six work-related disease or disorder categories are proposed as national priorities in the first five years of the Strategy. These have been chosen based on their [severity](#), the number of workers estimated to be affected, and the existence of known prevention options.

At the time of the development there is limited reliable national data on short latency occupational diseases, and a lack of reliable national data on work-related long latency diseases and disorders. Establishing numeric targets on the incidence of these diseases is therefore not yet possible.

For short latency diseases, there are clearer links between work-related exposure and subsequently developing the disease. For long latency diseases, although exposure to known hazards may be well-established as a cause of the disease, work-relatedness may be more difficult to establish.

The Strategy proposes in the first five years of the Strategy:

- establishing targets to reduce short latency diseases, and
- establishing targets to reduce exposure to the causes of long latency diseases

Priority work-related diseases:

The work-related disease and disorder categories are:

musculoskeletal disorders

mental disorders

cancers (including skin cancer)

asthma

contact dermatitis, and

noise-induced hearing loss

Please indicate whether you agree that the suggested diseases and disorders should be considered priorities:

**YES** ~~NO~~

~~YES~~ **NO**

~~YES~~ **NO**

~~YES~~ **NO**

~~YES~~ **NO**

~~YES~~ **NO**

### Comment:

**These consequences ignore the fact that road crashes in workplaces result in about 450 deaths every year in Australian workplaces.**

### Work-Related Disease Targets:

It may be possible to establish numeric targets for some short latency diseases in the first years of the Strategy.

Do you agree that numeric targets for reduction in the incidence of work-related short latency diseases should be established in the first years of the Strategy?

~~YES~~ **NO**

If you answered **No** please indicate why.

### Comment:

**Short latency diseases are largely irrelevant when considering the much greater consequences of workplace road safety.**

### Work-Related Disease Hazard Targets:

Establishing national targets for the prevention of exposure to the hazards which can cause short and long latency diseases is proposed by 2015.

Do you agree that targets for the prevention of exposure to disease causing agents should be established by 2015?

~~YES~~ **NO**

If you answered **No** please indicate why.

### Comment:

**are largely irrelevant when considering the much greater consequences of workplace road safety.**

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<b>ACTION AREAS</b> <b>Explanatory Note</b> The Strategy identifies seven national action areas which together will help deliver the 2022 Outcomes. Achieving each Outcome will involve activity in several Action Areas.	
<b>Healthy and Safe by Design: Hazards are eliminated or minimised by design</b>	
<i>a) Structures, plant, equipment and substances are designed to eliminate or minimise hazards or risks before they are introduced into the workplace</i>	Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes? <b>YES</b> <b>NO</b>
	<b>Comment</b> <b>This must include general vehicles</b>
	Is achieving this Outcome: <ul style="list-style-type: none"> <li>• very important</li> <li>• <del>important</del></li> <li>• <del>neutral</del></li> <li>• <del>of little importance</del></li> <li>• <del>of no importance</del></li> </ul>
	<b>Comment</b>
<i>b) Work and work processes and systems of work are designed and managed to eliminate or minimise hazards or risks</i>	Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes? <b>YES</b> <b>NO</b>
	<b>Comment</b> <b>This must include general vehicle travel</b>
	Is achieving this Outcome: <ul style="list-style-type: none"> <li>• very important</li> <li>• <del>important</del></li> <li>• <del>neutral</del></li> <li>• <del>of little importance</del></li> <li>• <del>of no importance</del></li> </ul>
	<b>Comment</b>
	Are there actions and/or activities that could be undertaken at the national level to support the achievement of these outcomes? <b>YES</b> <b>NO</b>
<b>Comment:</b> <b>A range of mutually complementary road safety management activities are required, such as improved vehicles, organisational culture, incentives, regulation, enforcement, etc.</b> <b>See attached Submission.</b> <a href="#">Back to Links</a>	
<b>Supply Chains and Networks: Improved work health and safety through supply chains and networks</b>	
<i>a) All links along a supply chain understand their cumulative impact and actively improve the health and safety of the supply chain.</i>	Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes? <b>YES</b> <b>NO</b>
	<b>Comment</b>
	Is achieving Outcome A:

	<ul style="list-style-type: none"> <li>• very important</li> <li>• <del>important</del></li> <li>• <del>neutral</del></li> <li>• <del>of little importance</del> of no importance</li> <li>• of no importance</li> </ul>
	<b>Comment</b>
<p><i>a) Commercial relationships within supply chains and networks are used to improve work health and safety.</i></p>	<p>Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes?</p> <p><b>YES</b> <del>NO</del></p>
	<p><b>Comment</b></p> <p><b>This must include workplace road safety</b></p>
	<p>Is achieving Outcome B:</p> <ul style="list-style-type: none"> <li>• <del>very important</del></li> <li>• important</li> <li>• <del>neutral</del></li> <li>• of no importance</li> </ul>
	<b>Comment</b>
<p><i>b) Industry leaders champion health and safety in supply chains and networks.</i></p>	<p>Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes?</p> <p><b>YES</b> <del>NO</del></p>
	<p><b>Comment</b></p> <p><b>This is especially important in improving workplace road safety</b></p>
	<p>Is achieving Outcome C:</p> <ul style="list-style-type: none"> <li>• very important</li> <li>• <del>important</del></li> <li>• <del>neutral</del></li> <li>• of no importance</li> </ul>
	<b>Comment</b>
	<p>Are there actions and/or activities that could be undertaken at the national level to support the achievement of these outcomes?</p> <p><b>YES</b> <del>NO</del></p>
<p><b>Comment</b></p> <p><b>A range of mutually complementary road safety management activities are required, such as improved vehicles, organisational culture, incentives, regulation, enforcement, etc.</b></p> <p><b>See attached Submission.</b></p> <p><a href="#">Back to Links</a></p>	
<p><b>Work Health and Safety Capabilities: Improved work health and safety capabilities.</b></p>	
<p><i>a) Everyone in a workplace has the work health and safety capabilities i.e. knowledge and skills they require.</i></p>	<p>Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes?</p> <p><b>YES</b> <del>NO</del></p>
	<p><b>Comment</b></p> <p><b>This is especially important in improving workplace road safety</b></p>
	<p>Is achieving Outcome A:</p> <ul style="list-style-type: none"> <li>• very important</li> </ul>

	<ul style="list-style-type: none"> <li><input type="radio"/> important</li> <li><input type="radio"/> neutral,</li> <li><input type="radio"/> of little importance</li> <li><input type="radio"/> of no importance</li> </ul>
	<b>Comment</b>
<b>b) Those providing work health and safety education, training and advice have the appropriate capabilities, i.e. knowledge, experience and skills.</b>	Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes? <b>YES</b> <del>NO</del>
	<b>Comment</b> <b>This is especially important in improving workplace road safety</b>
	Is achieving Outcome B: <ul style="list-style-type: none"> <li><input type="radio"/> very important</li> <li><input type="radio"/> important</li> <li><input type="radio"/> neutral,</li> <li><input type="radio"/> of little importance</li> <li><input type="radio"/> of no importance</li> </ul>
	<b>Comment</b>
<b>c) Inspectors and other staff of work health and safety regulators have work health and safety capabilities, i.e. knowledge, experience, skills and resources to effectively perform their role.</b>	Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes? <b>YES</b> <del>NO</del>
	<b>Comment</b> <b>This is critically important in improving workplace road safety, which represents a systematic regulatory failure.</b>
	Is achieving Outcome C: <ul style="list-style-type: none"> <li><input type="radio"/> very important</li> <li><input type="radio"/> important</li> <li><input type="radio"/> neutral,</li> <li><input type="radio"/> of little importance</li> <li><input type="radio"/> of no importance</li> </ul>
	<b>Comment</b>
<b>d) WHS skills development is appropriately integrated effectively into relevant education and training programs.</b>	Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes? <b>YES</b> <del>NO</del>
	<b>Comment</b> <b>This is important in improving workplace road safety</b>
	Is achieving Outcome D: <ul style="list-style-type: none"> <li><input type="radio"/> very important</li> <li><input type="radio"/> important</li> <li><input type="radio"/> neutral,</li> <li><input type="radio"/> of little importance</li> <li><input type="radio"/> of no importance</li> </ul>
	<b>Comment</b> Are there actions and/or activities that could be undertaken at the national level to support the achievement of these outcomes?

	<b>YES</b> <b>NO</b>
<b>Comment</b> <b>A range of mutually complementary road safety management activities are required, such as improved vehicles, organisational culture, incentives, regulation, enforcement, etc.</b> <b>See attached Submission.</b> <a href="#">Back to Links</a>	
<b>Culture and Leadership: Community and organisational culture and leadership leading to improved work health and safety</b>	
<b>a) Proactive communities and their leaders drive improved work health and safety.</b>	Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes? <b>YES</b> <b>NO</b>
	<b>Comment</b> <b>This is especially important in improving workplace road safety</b>
	Is achieving Outcome A: <ul style="list-style-type: none"> <li>• very important</li> <li>• <del>important</del></li> <li>• <del>neutral,</del></li> <li>• <del>of little importance</del></li> <li>• of no importance</li> </ul>
	<b>Comment</b>
<b>b) Organisational leaders foster a culture of consultation and collaboration which actively improves work health and safety.</b>	Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes? <b>YES</b> <b>NO</b>
	<b>Comment</b> <b>This is especially important in improving workplace road safety</b>
	Is achieving Outcome B: <ul style="list-style-type: none"> <li>• very important</li> <li>• <del>important</del></li> <li>• <del>neutral,</del></li> <li>• <del>of little importance</del></li> <li>• of no importance</li> </ul>
	<b>Comment</b>
<b>c) Health and safety is given priority in all work processes and decisions.</b>	Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes? <b>YES</b> <b>NO</b>
	<b>Comment</b> <b>This must include workplace road safety</b>
	Is achieving Outcome C: <ul style="list-style-type: none"> <li>• very important</li> <li>• <del>important</del></li> <li>• <del>neutral,</del></li> <li>• <del>of little importance</del></li> <li>• of no importance</li> </ul>
	<b>Comment</b>
	Are there actions and/or activities that could be

	<p>undertaken at the national level to support the achievement of these outcomes?</p> <p><b>YES</b> <b>NO</b></p>
<p><b>Comment</b></p> <p><b>A range of mutually complementary road safety management activities are required, such as improved vehicles, organisational culture, incentives, regulation, enforcement, etc.</b></p> <p><b>See attached Submission.</b></p> <p><a href="#">Back to Links</a></p>	
<p><b>Research and Evaluation: Evidence-informed policy, programs and practice</b></p>	
<p><i>a) Research and evaluation are targeted to provide the evidence to prioritise and progress areas of national interest.</i></p>	<p>Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes?</p> <p><b>YES</b> <b>NO</b></p>
	<p><b>Comment</b></p> <p><b>This is critically important in improving workplace road safety due to the paucity of information on workplace road safety which systematically conceals the issue.</b></p>
	<p>Is achieving Outcome A:</p> <ul style="list-style-type: none"> <li>• very important</li> <li>• <del>important</del></li> <li>• <del>neutral,</del></li> <li>• <del>of little importance</del></li> <li>• <del>of no importance</del></li> </ul>
	<p><b>Comment</b></p>
<p><i>b) Australia has an effective research infrastructure and capacity.</i></p>	<p>Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes?</p> <p><b>YES</b> <b>NO</b></p>
	<p><b>Comment</b></p> <p><b>There is substantial research capability, but overwhelmingly insufficient investment in research in the critical area of workplace road safety.</b></p>
	<p>Is achieving Outcome B:</p> <ul style="list-style-type: none"> <li>• very important</li> <li>• <del>important</del></li> <li>• <del>neutral,</del></li> <li>• <del>of little importance</del></li> <li>• of no importance</li> </ul>
	<p><b>Comment</b></p>
<p><i>c) Translating evidence to assist practical application.</i></p>	<p>Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes?</p> <p><b>YES</b> <b>NO</b></p>
	<p><b>Comment</b></p> <p><b>There is substantial information available which could be applied, but overwhelmingly insufficient effort to do so in the critical area of workplace road safety.</b></p>

	<p>Is achieving Outcome C:</p> <ul style="list-style-type: none"> <li>• very important</li> <li>• <del>important</del></li> <li>• <del>neutral,</del></li> <li>• <del>of little importance</del></li> <li>• <del>of no importance</del></li> </ul> <p><b>Comment</b></p>
<p><i>d) The results of research are disseminated and implemented.</i></p>	<p>Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes?</p> <p><b>YES</b> <del>NO</del></p>
	<p><b>Comment</b></p> <p><b>There is substantial research available which could be disseminated and implemented, but overwhelmingly insufficient effort to do so in the critical area of workplace road safety.</b></p>
	<p>Is achieving Outcome D:</p> <ul style="list-style-type: none"> <li>• very important</li> <li>• <del>important</del></li> <li>• <del>neutral,</del></li> <li>• <del>of little importance</del></li> <li>• <del>of no importance</del></li> </ul>
	<p><b>Comment</b></p> <p>Are there actions and/or activities that could be undertaken at the national level to support the achievement of these outcomes?</p> <p><b>YES</b> <del>NO</del></p>
<p><b>Comment</b></p> <p><b>A range of mutually complementary road safety management activities are required, such as improved vehicles, organisational culture, incentives, regulation, enforcement, etc.</b></p> <p><b>See attached Submission.</b></p> <p><a href="#">Back to Links</a></p>	
<p><b>Government: Governments improve work health and safety</b></p>	
<p><i>a) Work health and safety is actively considered in the development, implementation and evaluation of government policy.</i></p>	<p>Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes?</p> <p><b>YES</b> <del>NO</del></p>
	<p><b>Comment</b></p> <p><b>Leadership by government, including inclusion of workplace road safety in government policy, is especially important in improving workplace road safety</b></p>
	<p>Is achieving Outcome A:</p> <ul style="list-style-type: none"> <li>• very important</li> <li>• <del>important</del></li> <li>• <del>neutral,</del></li> <li>• <del>of little importance</del></li> <li>• <del>of no importance</del></li> </ul>
	<p><b>Comment</b></p>



<p><b>b) Governments use their investment and purchasing power to improve work health and safety.</b></p>	<p>Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes?</p> <p><b>YES</b> <del>NO</del></p>
	<p><b>Comment</b></p> <p><b>The market influence of government is especially valuable in improving workplace road safety</b></p>
	<p>Is achieving Outcome B:</p> <ul style="list-style-type: none"> <li>• very important</li> <li>• <del>important</del></li> <li>• <del>neutral,</del></li> <li>• <del>of little importance</del></li> <li>• of no importance</li> </ul>
	<p><b>Comment</b></p>
<p><b>c) Governments exemplify good work health and safety.</b></p>	<p>Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes?</p> <p><b>YES</b> <del>NO</del></p>
	<p><b>Comment</b></p> <p><b>Demonstration by government, including inclusion of workplace road safety in government practice, is important in improving workplace road safety</b></p>
	<p>Is achieving Outcome C:</p> <ul style="list-style-type: none"> <li>• very important</li> <li>• <del>important</del></li> <li>• <del>neutral,</del></li> <li>• <del>of little importance</del></li> <li>• of no importance</li> </ul>
	<p><b>Comment</b></p>
	<p>Are there actions and/or activities that could be undertaken at the national level to support the achievement of these outcomes?</p> <p><b>YES</b> <del>NO</del></p>
<p><b>Comment</b></p> <p><b>A range of mutually complementary road safety management activities are required, such as improved vehicles, organisational culture, incentives, regulation, enforcement, etc.</b></p> <p><b>See attached Submission.</b></p> <p><a href="#">Back to Links</a></p>	
<p><b>Responsive Regulatory Framework: The regulatory framework responds and adapts to changing circumstances to maintain effectiveness</b></p>	
<p><b>a) Legislation, policies and regulatory practice are reviewed and monitored to ensure they are responsive and effective.</b></p>	<p>Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes?</p> <p><b>YES</b> <del>NO</del></p>
	<p><b>Comment</b></p> <p><b>This is critically important in improving workplace road safety, which represents a systematic regulatory failure.</b></p>

	<p>Is achieving Outcome A:</p> <ul style="list-style-type: none"> <li>• very important</li> <li>• <del>important</del></li> <li>• <del>neutral,</del></li> <li>• <del>of little importance</del></li> <li>• <del>of no importance</del></li> </ul>
	<p><b>Comment</b></p>
<p>a) <i>Relationships between regulators and all who have a stake in work health and safety are effective, constructive, transparent and accountable.</i></p>	<p>Do you agree that achieving this outcome will contribute to achieving the 2022 Outcomes?</p> <p><b>YES</b> <del>NO</del></p> <p><b>Comment</b></p> <p><b>While potentially useful, this issue is not high value compared with other activities and distracts from other priorities.</b></p> <p>Is achieving Outcome B:</p> <ul style="list-style-type: none"> <li>• <del>very important</del></li> <li>• <del>important</del></li> <li>• neutral,</li> <li>• <del>of little importance</del></li> <li>• <del>of no importance</del></li> </ul> <p><b>Comment</b></p> <p>Are there actions and/or activities that could be undertaken at the national level to support the achievement of these outcomes?</p> <p><b>YES</b> <del>NO</del></p>
<p><b>Comment</b></p> <p><b>A range of mutually complementary road safety management activities are required, such as improved vehicles, organisational culture, incentives, regulation, enforcement, etc.</b></p> <p><b>See attached Submission.</b></p> <p><a href="#">Back to Links</a></p> <p><a href="#">Next Page</a></p>	

<b>ADDITIONAL ISSUES</b> <b>Explanatory Note:</b> The Strategy also addresses discussed the need for international collaboration and regular reporting on progress.	
<b>International Collaboration</b> <i>Australia is a signatory to a range of international work health and safety conventions and agreements. This is one important way Australia can demonstrate our commitment and regional leadership in work health and safety.</i> <i>Australia should continue to contribute to building the international evidence base on work health and safety through appropriate international collaboration, cooperation and exchange of information particularly in relation to our national priorities. Australia can support the building of work health and safety capacity in our region.</i>	Is it important that the Australian Work Health and Safety Strategy should include an international focus? <b>YES</b> <del>NO</del>
<b>Comment</b> <b>Many safety management activities are known from international practice. We need to be internationally aware but focus efforts on local activity.</b> <a href="#">Back to Links</a>	
<b>Reporting</b> There will be an annual progress and activities report on national, and the Strategy (and Implementation Plan) will be comprehensively reviewed in 2017. Informed by the 2017 review, the Strategy will be modified as required to ensure its continued effectiveness.	Are the proposed reporting arrangements sufficient? <del>YES</del> <b>NO</b>
	<b>Comment:</b> <b>Workplace road safety must be specifically reported.</b>
	What would you like to see included in annual and periodic reports on the Strategy?
	<b>Comment:</b> <b>Workplace road safety must be specifically reported.</b>
<b>GENERAL COMMENTS</b> <a href="#">Back to Links</a>	
Is there anything in the draft Strategy that shouldn't be there?	<b>Comment:</b>
Should the draft Strategy include additional material? If so what?	<b>Comment:</b> <b>Workplace road safety must be specifically addressed. See attached Submission.</b>
How could the draft Strategy be improved?	<b>Comment:</b> <b>Specifically address road safety in workplaces.</b>
If you wish to comment on any other issues in the draft Strategy which have not been addressed in the questions above, please include your comment in the <b>ADDITIONAL COMMENTS</b> area at the end of the questions. <b>If you wish to make any additional comments please <a href="#">click here</a>.</b>	

**ADDITIONAL COMMENTS**

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**The scope implies that compensated injuries and fatalities are the extent of the problem which is incorrect. Most road safety deaths and injuries in workplaces are not included in the compensated injuries and fatalities, which is a systemic failure.**

**See attached Submission.**

**DEFINITIONS:**

**Incidence rates:**

The incidence rate is calculated as the number of accepted workers' compensation claims resulting in one or more weeks off work per 1000 employees.

**Compensated Injury Fatalities:**

Compensated injury fatalities refer to those fatalities due to an injury while working and for which there are accepted workers' compensation claims. It does not include fatalities of those workers not covered by compensation, for example self-employed farmers or self-employed construction trades persons.

**Body stressing Injuries:**

Body stressing refers to injuries or diseases which result from stress placed on muscles, tendons, ligaments and bones. It includes:

Muscular stress while lifting, carrying or putting down objects

Muscular stress while handling objects other than lifting, carrying or putting down

Muscular stress with no objects being handled (for example, bending, turning or twisting movements)

Repetitive movement, low muscle loading (for example, occupational overuse)

Claims due to body stressing account for about 40 per cent of all claims resulting in one or more weeks off work.

**Severity:**

The severity of the injury, disease or disorder refers to the seriousness of the potential consequences of the injury, disease or disorder for example whether it is potentially life threatening or causes a permanent or long-term disability.

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