

# ACRS Policy Position Statement

## The Vehicle as a Workplace

### Summary

A significant proportion of fatalities and injuries on the road involve people who are working at the time. Unfortunately, the exact number of work-related road casualties is not clear because this information is not collected for all crashes. In this statement, the term crash can sometimes include critical events which may not have led to a crash. While it can sometimes be inferred by the type of vehicle involved, it is not always possible to identify which crashes involved someone who was working at the time. Understanding the work-related status of people involved in casualty crashes is important for understanding why the crashes occurred and what can be done to prevent them. There is good evidence that some characteristics of work can influence road user behaviour in ways that can compromise safety. This includes high time pressures, long duration work and work-related tasks that distract the driver. We need to identify when these work-related factors play a role in causing crashes and take action to reduce their impact on road safety.

### Key policy positions

1. Recognise that work-related driving may involve additional risks over and above other road users and we need to develop a work-related road crash classification for inclusion in routine data and analysis of the causes of road crashes.
2. Crash analysis should include the broad range of work-related factors that may increase safety risk.
3. Road safety and work safety authorities should work closely together to reduce factors in work that increase safety risk on and around roads.

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## Policy problem

In attempting to define the main concerns for road safety, we often overlook the fact that many drivers and vehicles involved in crashes were working at the time. Failure to acknowledge this means we neglect a set of important factors that increase crash risk and more importantly, we miss opportunities to make our road system safer. The circumstances for drivers who are working or engaged in work-related activities are often very different from those who are not working. This can include the length of the driving period, time of day, the level of pressure or incentives for drivers to complete their trip and the number and timing of breaks taken. The nature of the vehicle driven for work is also often different to that used for recreation. For example, heavy vehicles like trucks and buses, emergency services, public transport and charter vehicles and taxis are all mostly used for work, but almost any type of vehicle could be used for work including cars, motorcycles, scooters and bicycles.

These differences can represent a considerably higher crash risk when the vehicle is a workplace beyond that of recreational driving. For example, simply driving for long hours as freight and passenger transport drivers routinely do, increases crash risk due to higher exposure to the road system. Driving mostly during the night, such as is required for emergency service drivers also represents higher crash risk than driving during daylight and through periods when human physiology is adapted to be awake. Jobs where drivers are experiencing high levels of stress and mental demand such as urgent duty driving (undertaken by emergency services – police, fire, ambulance, SES) where high speeds, with lights and sirens combined with potential concern about the likely circumstances when they reach their destination, also significantly increase crash risk. Pressure on drivers to complete trips as quickly as possible by exceeding speed limits and failing to take breaks from driving will increase crash risk. For drivers with short delivery windows or who are paid when trips are completed this situation may be more pronounced. Productivity pressure can also increase crash risk of working vehicles through poor quality vehicles and neglect of vehicle maintenance.

The origins of at least some of these work-related causes of crashes can be out of the control of road authorities. This means that solutions to these road safety problems must involve actions at the workplace level in all workplaces. All businesses, from sole-operators through to large corporations with health and safety committees need to consider and respond to the risks by providing safe systems of work(1). For example, the Chain of Responsibility legislation implemented in the heavy vehicle road transport industry in Australia is an attempt to achieve this(2). In this initiative, each of the parties from the driver to the business that employs them or owns the vehicle, to the business that sends or receives goods is accountable for the safety of the heavy vehicle, its driver, and its load throughout the journey. This means, for example, that these parties can be held liable if they put pressure on heavy truck drivers to drive for too long, go without rest breaks, exceed speed limits or drive vehicles that are not properly maintained. Further actions are needed to ensure that work-related factors do not impinge on road safety.

Employers have specific obligations regarding the provision of timely and appropriate training and education regarding safe driving for work purposes. While their drivers are licensed, variables are likely across the employee cohort regarding driving experience and training, therefore further training should be provided in context. New technologies and systems of work may be introduced, and employers must ensure that appropriate training and education is provided regarding their safe use. This could be in the guise of a workplace road safety guide appropriate to the organisation size and work undertaken.

The objective of this Policy Position Statement is to highlight the need to understand the role of work-related factors in the causes of road crashes, to identify actions to obtain better data on these problems and to identify strategies for road and workplace safety authorities to work together to improve safety outcomes from both perspectives.

## Principles underpinning ACRS position

- Prevent all fatal and serious injury crashes on our roads.
- The road traffic system must be made safe for all road users.
- Draw from the Safe System principles that have already been adopted.
- Use a systems approach that includes relevant elements of the Chain of Responsibility.
- Align best-practice workplace safety with best practice road safety.
- Align best practice workplace safety with duty of care and system safety.

## Evidence base

Accurate and comprehensive data on the number of road traffic fatalities and serious injuries while working are difficult to obtain. We know that in 2021 there were 1123 road deaths(3) but it is unknown how many of these involved vehicular workplaces. In 2021, Safework Australia reported that 64 workers in Australia were killed in vehicle collisions\* representing 38% of all worker fatalities for that year(4). This agency pointed out, however, that these figures underestimate vehicle-related fatalities while working due to the way these deaths are identified(5). Commuting fatalities are excluded for example and fatalities involving self-employed people are also likely to be missed. Nevertheless, Safework Australia identified road transport as a priority. Furthermore, in New Zealand, 48% of worker fatalities involved vehicles between July 2022 and June 2023(6). These statistics indicate that a significant proportion of work-related fatalities occur on the road, but more effort is needed to determine the actual numbers of crashes where the vehicle is a workplace and the circumstances in which they occur.

This is important because many characteristics of work-related driving can amplify crash risk. Evidence from naturalistic driving studies shows that inattention and eyes off the road are associated with higher crash risk(7, 8) and that more than half of crashes involved distraction activities(9). These circumstances are part of the job for a working driver who is required to respond while driving, even hands-free, to phone calls from their employer or customers, or to keep checking a screen-based navigation system to find the next delivery address or accept the next job in the gig economy. Many aspects of the driving task demand significant attentional resources and represent high workload for drivers(10) which can become unmanageable if the driver is also coping with work-related demands. Work-related factors that increase the likelihood of fatigue are also very common for people who drive for work which in turn increases the risk of crashes(11). We need to identify when these work-related factors play a role in causing crashes and take action to reduce their impact on road safety.

Australia's National Road Safety Action Plan and New Zealand's Road Safety Strategy promote a number of actions in this area, among them coordinating efforts with Safe Work Australia's national approach to improving work health and safety in road transport, leading research, establishing data, and funding workplace road safety awareness campaigns(12).

## Recommended policy actions

1. *'Work related'* road crash data should be recognised as an important information need and a *'work related'* road crash classification should be developed and included as part of a nationally consistent, routine collection and analysis of road crash data aligned with recent Government recommendations(13). See also the recommended policy actions contained within the ACRS *'Data and Information Needs'* Policy Position Statement(14).
  - a. A *'vehicular workplace'* should be defined for consistent use across all jurisdictions.

- b. Road crash data collections should include details of the characteristics of work-related crashes including factors like time pressures, shift work, fatigue, non-driving activities and poor vehicle design and/or maintenance and finally road design, road maintenance history and applicable road star rating.
  - c. 'Work Related' road crash data should be openly accessible, open for data mining, with applicable privacy and confidentiality systems in place.
  - d. Essential to include risk incident identification, monitoring, investigation, and follow-up actions.
2. The responses to workplace road safety issues across all Governments, WHS agencies and employers should at least be proportional to its prevalence as a Workplace Health and Safety issue. This includes suitable education and training for employees.
3. Road and work safety authorities should establish a formalised structure to facilitate working together to address work related issues that increase casualty crash risk.
4. Address higher and/or unrecognised risks for specific categories of drivers, e.g.:
  - a. Who work in the contract or 'gig' economy where productivity pressure creates higher crash risk.
  - b. Commuting between work and home.

### ACRS actions

1. Highlight work-related road crash data as an essential road safety research need.
2. Advocate for a proportionate response to the workplace road safety issue.
3. Advocate for gig economy workers to be recognised and protected by WHS related legislation, adequate training, safest vehicles and PPE equipment.
4. Promote the use of the safest vehicles with appropriate driver training as a first preference for all workplaces.
5. Recognise and promote the impact of commuting to or from home on workplace road safety.

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