

23 March 2021

Office of Road Safety
GPO Box 594
CANBERRA ACT 2601

Dear Office of Road Safety,

RE: Draft National Road Safety Strategy for 2021-30

Injury Matters commends the Office of Road Safety for its leadership in developing the draft National Road Safety Strategy 2021-30, and for the opportunity to input into a Strategy that maps out a path to foster road safety culture in Australia.

At Injury Matters we are dedicated to preventing and reducing the impact of injury within the Western Australian community. Working towards our vision of safer people and places, we raise awareness of injury prevention through education, training, advocacy, and support for those affected by the impact of injury.

Funded as part of the National Heavy Vehicles' Heavy Vehicle Safety Initiative, Injury Matters has recently commenced the delivery of the Mental and Physical Safety on our Roads program. This awareness raising initiative aims to improve the mental and physical safety of heavy vehicle operators in Western Australia as a means of improving heavy vehicle safety.

Additionally, with funding from the Road Trauma Trust Account we deliver Road Trauma Support WA, a free state-wide service providing information, resources, support and counselling services to Western Australian's affected by a road crash. Recognising the traumatic nature, the potential impact beyond the individuals at the crash scene and the long-term psychosocial impact of road trauma, our counselling service is offered to Western Australians regardless of when the event occurred or what their involvement was in the road crash.

Despite the true psychosocial impact of road crashes being unquantifiable, the ongoing need to support the mental health of individuals who have been affected by a road crash is reflected by our service receiving over 1,760 enquiries and providing 846 counselling instances during the 2019-2020 financial year.

As evident in our consultation responses, overall Injury Matters agrees that the draft Strategy provides a comprehensive overview of the leading actions that should be taken to reduce the largely avoidable burden that road crashes impose on all Australians. However, Injury Matters overarching recommendation is for the addition of post-crash mental health care within the Strategy.

Injury Matters is supportive of the development of the National Road Safety Strategy 2021-30, the National Road Safety Action Plan and the proposed mechanisms to monitor progress of the Strategy via a National Data Hub and Annual Progress Reports. Should you require additional information or would like to discuss any of the priorities included in this submission please feel free to contact Christine Smith, Injury Matters' Trauma Support General Manager on 6166 7688 or csmith@injurymatters.org.au.

Yours sincerely,



Sandy Lukjanowski

Chief Executive

Submission:

Which area/s of the draft Strategy are you commenting on (select all that apply):

- Targets for reducing deaths and serious injuries
- The themes – safe roads, safe road use, safe vehicles and speed management
- Movement and place
- The social model
- Data and performance management
- Governance
- Infrastructure planning and investment
- Regional roads
- Remote areas
- Vehicle safety
- Heavy vehicle safety
- Workplace road safety
- Indigenous Australians
- Vulnerable road users
- Risky road use
- Other/not listed

1. What is your primary area of interest in road safety?

At Injury Matters we have a vision of safer people and places and are dedicated to preventing and reducing the impact of injury within the Western Australian community. Given road crashes are a leading cause of injury-related morbidity and mortality in Western Australia, holistic road safety is a key pillar of our work.

Currently our primary areas of interest in road safety relate to psychosocial support following a road traffic crash and the mental and physical safety of heavy vehicle operators.

2. What road safety issues are the most important to address?

An average of 168 people are killed and 1,513 people are seriously injured on WA roads every year¹, therefore anything contributing to road crashes occurring is an issue that needs to be addressed.

Over the last ten years in WA there has been a significant reduction in road crashes involving young people, road crashes injuring vehicle occupants and crashes involving risk taking behaviours such as speeding, drink driving and not wearing a seatbelt.¹

However there has been less progress in;

1. Reducing road crashes involving mistakes, inattention and tiredness,
2. Improving the safety of vulnerable road users,

3. Reducing the incidence of road crashes in regional and remote WA, and
4. The enablement of automatic referrals for post-crash support after a serious road traffic incident.

Given their significant opportunity for improvement, these are the key road safety issues Injury Matters supports the prioritisation of.

3. What do you believe are the strengths of this draft Strategy?

Focus on a holistic approach:

Injury Matters supports the draft Strategy's adoption of a social model approach and its role in reinforcing that road safety is not just a transport problem, but rather an issue that requires action across the spectrum of government, interagency partnerships and everyday actions by all Australians. In particular we commend recognising the significant role that local government will play in achieving the long-term goal and the acknowledgment of the potential impact that other preventative health work, such as mental health and the National Injury Prevention Strategy, may have on achieving Vision Zero.

Additionally, Injury Matters strongly endorses the underpinning Safe Systems Approach's value in ensuring that the proposed Strategy caters for all users of the road transport system. We acknowledge that there is a limit to human performance and that people make mistakes, however we support the role that the Safe Systems Approach has in offering maximum impact in creating a safer road environment in Australia.

Link to global targets:

Injury Matters commends the draft Strategy in meeting, and in some areas exceeding, the road safety indicators outlined within the *Stockholm Declaration* developed at the 3rd Global Ministerial Conference on Road Safety.²

Improved accountability and measurability:

Injury Matters congratulate the Office of Road Safety for responding to the recommendations from the Inquiry into the National Road Safety Strategy 2011 – 2020 by committing to an enhanced governance framework, a Five Year National Road Safety Action Plan, a performance management system and a reporting system.

It has been suggested that the limited success of the 2011 – 2020 Strategy has been attributed to unclear governance agreements, a lack of transparency regarding progress, irregular measurement of targets and minimal accountability to the targets. As a result, we are glad to see the inclusion of guiding principles within the draft Strategy that address these core elements.

The establishment of the \$5.5 million National Road Safety Data Hub is another key element of the draft Strategy that we believe strengthens the Strategy. Its role in providing an evidence base to drive best practice outcomes and enabling transparency on the effectiveness of implemented initiatives.

Additionally, the draft Strategy's clear communication of the roles and responsibilities (page 26 and 27) is a component of the Strategy that Injury Matters supports. It clearly breaks down the responsibilities that everyone has in road safety and allows different levels of government and other organisations to understand what their role is in achieving the Strategy's short-term goals.

Acknowledgement of the need to support the transport industry:

In 2020 Injury Matters completed formative research regarding the mental and physical safety of WA heavy vehicle operators and the broader heavy vehicle industry's attitudes towards road safety. The findings of this research, alongside the impact of the COVID-19 pandemic, highlighted the vital role that the transport industry have as frontline workers, however their road safety needs are often not prioritised. Injury Matters endorses the inclusion of heavy vehicles as a dedicated priority area and the strong reference throughout the draft Strategy of the unique needs of the transport industry.

Prioritisation of regional and remote road safety:

As previously mentioned, due to the vast state of Western Australia and differing road conditions, the incidence of road crashes in regional and remote WA is an issue that needs addressing. We support the inclusion of regional and remote safety as a priority within the draft Strategy.

4. Is there anything important that you think is missing from this draft Strategy?

Inclusion of post-crash care:

As the draft Strategy includes three main themes regarding Safe Roads, Safe Vehicles and Safe Road Users, and outlines Speed Management as an underpinning factor to these three themes, we note that Post Crash Care is the only element of the Safe System Approach that has not been included in the draft Strategy. This is despite post-crash response being a pillar of the second Decade of Action for Road Safety 2021 – 2030 and its inclusion of an action regarding the provision of psychosocial follow-up support to personnel involved in a crash.

It is important to acknowledge the long-term affect a road crash may have on individuals and the broader community, including; witnesses, first responders and family members. Despite the mental health consequences of a road traffic crash having the potential to be long-term, they are often overlooked in comparison to physical health outcomes.³ The World Health Organization describes mental health care as a key component of the post-crash response.⁴

Road crashes are associated with significant psychological distress.⁵ Research studies in Australia indicate that 8 - 29% of road traffic crash survivors develop post-traumatic stress disorder (PTSD).³ PTSD is one of the most common psychological consequences for adult road traffic crash survivors and can have serious and long-lasting consequences for recovery if left untreated.³

Continued investment in post-crash care, particularly mental health support services, is a priority issue that requires further consideration nationally. The provision of high quality, accessible post-crash services for those affected by road trauma, will assist in reducing the number of hospital admissions/re-admissions and use of other health services, as well as enhance the quality and life of those affected.

We acknowledge that post-crash care was removed as a priority area after the Strategy's stakeholder consultation phase, however we request that post-crash care, particularly mental health care, is included in the final Strategy. Injury Matters advocates for the introduction of a national post-crash referral pathway, similar to that administered in Victoria by the Transport Accident Commission, where anyone impacted by road trauma can be automatically contacted with varied levels of support to offer assistance with their recovery following a crash. Injury Matters are a national leader in post-crash care and would be happy to discuss our model further.

Role of mental health:

Additionally, we note that there is an underrepresentation of mental health within the Strategy. Mental health concerns have the potential to influence unsafe driving behaviours (i.e. lowered alertness, increased anxiety, heightened aggression on the roads and suicide by road) and therefore we support the need for advocacy around positive mental health as a supportive road safety strategy. The inclusion of reference within the Strategy to the current Government lead investigation into suicide by road transport would also be beneficial.

Access to the Five Year Action Plan:

Embedding the social model approach will take time, reinforcing the vital role that the Five Year Action Plan will have in ensuring short term indicators are achieved and that the Strategy is successfully tracking towards the 2050 goal.

The inability to read the Action Plan alongside the draft Strategy limits consultation participants ability to understand how the Strategy will be actioned and what budget will be required to deliver the Action Plan. For example, Injury Matters admires the short term goals of a 50% reduction in road crash fatalities and a 30% reduction in road crash serious injuries per capita by 2030, however without knowing what actions will be taken over the next five years we are concerned about the feasibility to achieve these goals.

Additionally, it is proposed that the Five Year Action Plan will outline what each jurisdiction is accountable for, so transparency in what this allocation looks like would be valuable.

Minimal focus on education:

While investment in road infrastructure, policies and safer vehicles are important, it's equally important to invest in programs which have a behavioural focus to further educate the public on road safety and achieve cultural change. This is particularly important for high-risk population groups (i.e. older adults, regional drivers and inexperienced drivers). Information and education on safe road practice should continue to focus on risk taking behaviour. However, it must also be informative of the inherent driving risks associated with a lapse in judgement, distraction or fatigue.

Currently the proposed regional and remote safety priorities do not include any reference to targeted education, despite stakeholder consultation findings highlighting education around the safe use of regional roads as a key avenue to effect change in regional road safety. Injury Matters supports the educational initiatives proposed by the organisations involved in the stakeholder consultation phase.

Additionally, Injury Matters encourage the implementation of initiatives that focus on educating all road users about how to safely share the road with heavy vehicles.

Heavy vehicle safety actions:

As previously mentioned, Injury Matters supports the inclusion of heavy vehicles as a priority within the draft Strategy. However, we note the exclusion of key feedback received during the stakeholder consultation phase regarding;

1. A need to better understand the risk factors associated with heavy vehicle crashes,
2. Education for all road users on how to safely interact with heavy vehicles,
3. Further understanding of the extent of suicide by truck,
4. How to best address the growing incident of suicide by truck, and
5. The responsibility of the whole supply chain on heavy vehicle safety.

Tailored support for vulnerable population groups:

The draft Strategy claims to want to achieve “safe transport options for all ages and abilities, including the most vulnerable in our communities”, however there is no recognition of actions that will be taken to address the contributing social factors that increase vulnerable population groups risk of injury. For example, different cultural groups could be considered a priority group for further education due to the impact of transferring licences, differing road rules across countries and limited access to culturally appropriate training. Additionally, a more rounded approach for road safety for our ageing population, as drivers and pedestrians would be valuable.

Other missing elements:

- In 2019 crashes involving errors, tiredness and inattention contributed to 1,414 people being killed or seriously injured on WA roads.¹ Given the frequent representation of these factors to road crashes Injury Matters would like to see more of a focus of these risk factors within the Strategy.
- Despite multiple references to the value in adopting the social model approach, there is limited mention within the draft Strategy of the actions that will focus on the “community approach” and “individual functions” layers of the approach.
- The draft strategy acknowledges the importance of working with other stakeholders and notes that one of the first actions of the Strategy is to influence other strategies. Injury Matters supports the reference to how the Strategy will link to the National Injury Prevention Strategy, however we feel that the Strategy would be strengthened by outlining what other strategies this Strategy will link to (i.e. Local Government Health Strategies and the Road Safety Strategy for Western Australia 2020-2030).
- Injury Matters welcomes the draft Strategy’s recognition of the need to change driving culture and perceptions, however there are minimal actions outlining how this will be achieved. We have particular interest in continued promotion and utilisation of social marketing campaigns, which aim to change perceptions of personal responsibility on the roads. Utilising community focussed not-for profit organisations who have a role in health-related behaviour change could be an avenue to achieving this cultural change.
- The progress to “bring together a national picture of serious injuries from road crashes by mid-2021” will be valuable in quantifying the physical impact of road

crashes in Australia. However, the draft Strategy does not commit to research to better understand the prevalence of mental health conditions following a road crash.

- Need for additional actions regarding “future focused research” to fund research where there is limited evidence regarding the implementation of evidence-based road safety initiatives.
- There is a lack of references in the draft Strategy, particularly when highlighting statistics or research findings. If these references are included in the supporting fact sheets and similar external documentation, there would be value in explaining this within the final Strategy.

References:

1. Government of Western Australia. Driving Change. Road Safety Strategy for Western Australia 2020-2030. (2020).
2. Third Global Ministerial Conference on Road Safety attendees. Stockholm Declaration. Third Global Ministerial Conference on Road Safety: Achieving Global Goals 2030. (2020).
3. Heron-Delaney, M., Kenardy, J., Charlton, E. & Matsuoka, Y. A systematic review of predictors of posttraumatic stress disorder (PTSD) for adult road traffic crash survivors. *Injury* **44**, 1413–1422 (2013).
4. World Health Organization. *Post-crash response: Supporting those affected by road traffic crashes*. http://www.who.int/violence_injury_prevention/publications/road_traffic/Post-crash_response_booklet.pdf (2016).
5. Mayou, R., Bryant, B. & Ehlers, A. Prediction of Psychological Outcomes One Year After a Motor Vehicle Accident. *Am. J. Psychiatry* **158**, 1231–1238 (2001).