

A review of Road Safety Governance in Western Australia

**A response to the Review by RAC WA
October 2014**



For the better

RAC WA response to the Review

Introduction

The RAC represents the interests of more than 800,000 Western Australians and is a leading advocate on the mobility issues and challenges facing our State. Drawing on our heritage, a key role for the RAC is to act as a voice for our members and to be a strong public advocate about the road safety issues that affect Western Australia (WA).

The RAC collaborates with Government and other organisations to ensure safe, accessible and sustainable mobility options are available for our members and the community. Aligned with the themes of safety, accessibility and sustainability, the RAC is an active participant in the Road Safety Council, as a representative of all road users.

In 2012, the RAC published a *Public Discussion Paper on Road Safety Reform*. It identified many of the issues that have subsequently been identified in the *Review of Road Safety Governance in Western Australia*¹ by Peter Browne Consulting (the Review). In particular, that consideration should be given to appointing a Commissioner for Road Safety, on a similar basis to the Commissioner for Children and Young People, to lead efforts by the community and the public and private sector in reducing road trauma in WA.

The RAC welcomes the opportunity to respond to the Review and its recommendations¹ and strongly supports the call for change that is implicit in the Review. The hypothecation of 100% of speed and red light camera infringements has fundamentally changed the parameters and demands on the road safety management structure. The road safety structures need to change to maximise the outcomes of the hypothecated funds. These funds are an opportunity to significantly improve road safety outcomes in Western Australia (R1, R47).

The Review correctly identified that WA has moved from having the best state fatality record in 1990 to one of the poorest in 2013. Other Australian jurisdictions have used a suite of structures and strategies to improve their fatality records at a faster rate than WA. Our State was able to sustain a period of being a leader in road safety once, and only with the right governance model, policies and investment, can it do so again.

Governance - Structure

The RAC discussion paper identified the key issues for any road safety advisory and decision making structure:

- › Independence of advice;
- › Efficiency of process;
- › Ability to draw on technical expertise;
- › Ability to influence public policy decisions;
- › Ability to effectively direct Road Trauma Trust Account (RTTA) funds to high priority areas; and
- › Strategic and thought leadership on road safety issues and reform.

The RAC supports the Review's recommendation on the creation of a Commissioner for Road Safety on a similar basis to the Commissioner for Children and Young People (R47, qualified for R35 & R53). However, the recommended reporting relationship at a parliamentary level, currently identified as being directly to the Minister for Road Safety, needs further consideration. The RAC considers, as per the Commissioner for Children and Young People model, the Commissioner should report to Parliament rather than a Minister (R53, R35). The key issue of independence of advice depends on the independence offered by the reporting relationship to Parliament. This structural model would require the establishment of a Joint Parliamentary Standing Committee. The parliamentary reporting forum provides an opportunity for the Commissioner to clearly identify the extent to which government agencies with road safety responsibilities are or are not meeting those responsibilities effectively.

The Review's other structural recommendations are supported, particularly the appointment of a Road Safety Experts Panel to judge the merit of RTTA submissions, as they potentially satisfy an element of the key issues identified in the RAC discussion paper (R45, R37, R39, R41, R36, R44).

¹Where RAC comments are directly related to a specific recommendation of the Review the recommendation number is included in brackets after the comment.

The alternate embedded structure proposals which are a “re-worked version of what currently exists” should not be considered as they do not appear to present an opportunity to move road safety forward to a position of clearer governance nor strategic and thought leadership (R38). It is noted that the embedded structure proposals are not favoured by the Review.

The recommendation that the role of the Office of Road Safety should be as Secretariat to the Commissioner, Road Safety Advisory Council and Road Safety Experts Panel, rather than being a member of the Road Safety Council, is supported. (R10, R43, R12, R27, R40). New RTTA financial management, monitoring and program accountability functions should sit within the secretariat whilst the policy, research, communication and educative functions would be located in an appropriate host agency (R19, R22a, R24, R28, R16, R15, R13). This separation should resolve conflict issues and the need for monitoring and evaluation by third parties (R24).

Governance - Planning and Towards Zero

The RAC strongly supports a strategic plan and three year action plans, underlying and supporting Toward Zero, by providing shorter term guidance for priorities and decision making. This would include measureable targets and milestones and a reflection of current performance against the long term Towards Zero goals (R2, R48, R8).

The Review identifies a clear flaw in the current reporting relationship where some recipient agencies are reluctant to comply with monitoring and evaluation requirements. An independent Commissioner reporting directly to Parliament would have the capacity to publicly identify these shortcomings (R25).

In a similar vein the RAC supports the provision of six monthly reporting by relevant CEO's on progress towards reducing road fatalities (R42). CEO's should be made accountable for this reporting requirement, and the active contribution of their organisation toward road safety strategies, by the inclusion of a key performance indicator in performance plans.

Governance - Financial and RTTA

One of the RAC's key criticisms of the RTTA fund since 100% hypothecation in 2011 is that the fund is not being fully expended. The current \$80 million in unspent funds is not contributing to better road safety outcomes. This is despite WA having the worst fatality rate of any mainland state. This should not be interpreted as a desire to allocate 100% of the fund each year, setting aside funds in advance of significant projects would be an acceptable approach. However, the current

situation of reserving funds without a specified and publicly identified purpose is against the spirit of 100% hypothecation. This is an example where an independent Commissioner reporting directly to Parliament would have the capacity to publicly highlight this failure and ensure the timely allocation of funds (R18). The Review has given insufficient attention to the ongoing build-up of funds in the RTTA fund, particularly when considered in the context of WA's road fatality rate.

In general, the desire for Ministerial direction in setting the year's road safety priorities is supported. However, this may potentially create conflict with both Towards Zero and the supporting strategic plan (R14, R16). A rigorous analytical model supporting decision making has the capacity to minimise this conflict. An undertaking to publish explanations for unsuccessful RTTA submissions will also support the aspiration for increased transparency (R18).

One of the limitations of the current submission based funding model is that the direction is effectively set by the submitting agencies; consideration should be given to a more direct strategic purchasing approach. Where the Commissioner and Road Safety Advisory Council, using the Towards Zero strategy plan, determine a particular road safety strategy, approach or treatment is required, and then directly requests a price for delivering that strategy, approach or treatment. This places the chosen strategy at the centre of the process as opposed to relying on agency submissions to match with the strategy.

The recommendation to broaden the range of recipients of RTTA funding is both timely and sensible on the proviso that the funds continue to be almost entirely focussed on prevention of fatal and serious injury crashes as opposed to responding to crashes (R46, R21). In particular, the need to incorporate road safety treatments related to single vehicle run-off-road type crashes in rural and remote locations, on roads maintained by Local Government Authorities must be addressed.

There must be safeguards and standards built into the funding agreements so that RTTA funds are not substituted for standard funding provided to Government agencies. Government agencies must be open with the relevant output measures, so that direct Government funding can be differentiated from RTTA funding (R20). This distinction should be extended to funding for the administrative operations of red light and speed cameras as well as the administration of the RTTA fund itself, these costs should be wholly funded under standard Government agency funding. This would provide absolute clarity and certainty that all RTTA funds are being directed at road safety (R46, R20, R21, R17).

Data and Research

Good quality and timely data is an essential requirement for decision making and high quality research on road safety issues in WA. However it is unrealistic to expect agencies to

collect high quality data which is significantly beyond their core business needs. The solution is for the RTTA to directly fund and maintain a comprehensive data collection system which builds on the data collected by agencies and adds value by creating linkages between the datasets. This consolidated structure would also assist in avoiding duplication (R32). One of the key requirements of a comprehensive data collection system is timeliness, the system must be able to provide appropriate level data within appropriate timeframes.

Strategies

There are a number of recommendations identifying particular strategic approaches, the RAC believes the key to choosing between strategic approaches is using evidence to support the decision making process. The recommendation for more sophisticated cameras as opposed to more of the current speed and red light cameras needs to be tested against a research base (R33). There must be evidence that the current camera density has reached a saturation level or a point of diminishing returns. This evidence was not identified in the Review.

Adding new enforcement strategies such as point to point cameras is welcomed, a broader range of speed enforcement strategies will add to the deterrence effect (R31).

The link to the Victorian Traffic Accident Commission model is timely, currently Victoria has a substantially better road safety record (R55). To this end, the RAC is in the process of preparing a report contrasting features of the Victorian road safety environment and model with the WA approach. Areas of focus for this analysis include comparative enforcement levels and strategies, engineering approaches, governance and co-ordination strategies. It is anticipated that this analysis will lead to a better understanding of how Victoria has achieved better road safety outcomes.

Public education strategies targeting specific road user groups and particularly over represented groups are welcomed where those strategies can be more effective than broader whole community strategies (R29). The vital role of maintaining strategies must not be over looked, one-time strategies are unlikely to lead to long term attitude or behaviour change. Strategies must be maintained in order to support ongoing behavioural change.

Representation of road users

Under the current Road Safety Council structure the RAC has a representative role on behalf of all road users. The RAC has invested heavily in fulfilling this role and readily and visibly acts as a mobility advocate rather than an automobile focused organisation. This is evidenced by the RACs sustained work in relation to issues such as cycling safety and promotion, pedestrian safety, motorcycling safety, public transport and sustainability.

The RAC sponsorship and support of the RAC Rescue helicopter is one relevant service, supported by RAC for the better of our whole community. Provided by the WA State Government, managed by the Department of Fire and Emergency Services and based in Perth, it is WA's dedicated 24-hour emergency rescue helicopter. During its 10-year history, with the assistance of RAC sponsorship, it has flown more than 3,800 missions and helped save hundreds of lives. The helicopter also enables rescuers to reach those in need of help in areas that are inaccessible or difficult to access by road. This includes our regions.

In 2013/14, the RAC Community Education team provided road safety presentations to 28,000 students and 1,800 other community members including 6,000 in regional WA. The RAC also works with St John Ambulance, Department of Fire and Emergency Services, WA Police, Constable Care Child Safety Foundation and Royal Perth Hospital to deliver bStreetsmart for year 10-12 students. bStreetsmart includes the re-enactment of a crash scene. This re-enactment aims to inform and educate students about the real impact of road trauma. In 2014, 5,300 metropolitan students and 2,000 regional students attended the two bStreetsmart events.

The RAC's lead role in relation to the Motorcycle and Scooter Action Group and Vulnerable Road User Advisory Group has been pivotal to the safety forums based on the consultative OLA process and the ensuing strategy implementation process. In hosting road safety events and forums the RAC aims to inform, educate and inspire organisations about best practice road safety. The RAC has undertaken these activities as it recognises that each transport mode has a vital role in maintaining and improving mobility in WA.

In addition, the RAC has taken a very active role in sponsoring cycling activities; committing \$29,000 to Cycling Education programs in 2013/14 and 2014/15, approving \$29,946 since 2011/12 to Grass Roots Initiatives² related to cycling and a further \$178,252 since 2011/12 to larger Cycling Project Initiatives³. In 2013/14, the RAC contributed \$50,000 to a cycling focused Partnership Initiative. These sponsorship programs also contributed \$61,790 to walking and gopher related initiatives and projects. In total more than \$360,000 in grants and sponsorships have been provided since 2011/12 to the vulnerable road user community. In 2012, following the RAC formal response to the release of the Draft WA Bicycle Network released in 2011, the RAC funded and published a Cycling Business Case which identified that up to \$388 million was needed over 10 years to reverse the systemic lack of funding that was impacting on the standard of WA's cycling network and the safety of cyclists.

Whilst all agencies who are members of the Road Safety Advisory Council, and indeed individuals as road users, have a role in representing multiple road user groups, increased representation of road user sub groups on the Road Safety Advisory Council is welcomed (R37).

²Grass Roots Initiatives are grants up to \$5,000

³Project Initiatives are grants up to \$20,000

The Review notes the particular challenge of mounting effective public education programs in rural and remote areas and that the death of road users is 3 to 4.5 times more likely after a serious crash if it occurs in regional or remote WA, rather than in the metropolitan area. Representation by two rural and regional members on the Road Safety Advisory Council is supported along with the Road Safety Advisory Council holding at least one meeting per annum in regional areas so as to increase its awareness of non-metropolitan road safety issues (R37, R44).

Conflicts of interest

The Review identifies many of the conflicts within the current road safety administrative structure. The recommendation that Office of Road Safety be redefined and act as a secretariat as opposed to a participant is a first step to resolving primary conflicts. Ensuring that there is an appropriate balance between government agencies who are funding recipients and other representatives who are not recipients would also mitigate this risk.

Conclusion

As a State, we need to ensure we do everything we can to help continue to bring Western Australia's poor road fatality and serious injury rates down. There must be a renewed commitment to reducing the number of Western Australians killed and seriously injured on our roads. The Government must signal its commitment to embark on a major long-term effort to resolve the challenges and shortcomings identified in the Review so that current and emerging road safety issues can be satisfactorily addressed.

The RAC's key responses to the Browne Review are:

- › It is time for change;
- › The Commissioner Model is supported;
- › The Commissioner should report to a Joint Parliamentary Standing Committee rather than a Minister;
- › The role of the Office of Road Safety should be as secretariat to the Commissioner, Road Safety Advisory Council and the Road Safety Experts Panel;
- › Unspent and unallocated funds in the RTTA do not contribute to better road safety outcomes; and
- › There must be safeguards and standards built into funding agreements so that RTTA funds are not substituted for standard funding provided to Government agencies, including funding for the administration of the RTTA fund itself.

We trust that our submission will inform the Review process and we thank the Minister for the opportunity to comment. In support of the response we attach the following:

- › *Public Discussion Paper on Road Safety Reform, RAC, 2012*



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