Royal Society for the Prevention of Accidents Managing Occupational Road Risk (MORR): The story so far....

RoSPA's campaign

RoSPA has been campaigning since 1996 to get occupational road risk (ORR) addressed as part of mainstream health and safety management and regulation (see Annex one: Key Developments in the RoSPA MORR Initiative). It wants organisations to focus on the risks which their employees face (and create) when they are on the road as part of their job and make sure that they extend the arrangements which they should already have in place to deal with other aspects of health and safety so that these help to deliver continuous improvement in corporate road safety performance.

Key points

Key points emphasised by RoSPA and others have included:

- Between 25 –30 per cent of the 3,500 fatalities occurring on Britain's roads annually are likely to be work related;
- It is likely therefore that more people are killed in 'at-work' road accidents than in all other kinds of occupational accidents;
- Car and van drivers who cover 25,000 miles a year as part of their job appear to be at about the same risk of being killed at work as workers in acknowledged high hazard sectors such as construction and quarrying (and company car drivers have nearly twice the accident liability of drivers in general);
- Employers have moral as well as legal duties to assess these risks and take 'reasonably practicable measures' to ensure 'safe systems of work' for their drivers but in many cases this does not happen because health and safety law is not applied on the road;
- Organisations which are already 'up-to-speed' on health and safety will have little difficulty in responding to the challenges posed by the report;
- The 'business case' for 'at-work' road safety suggests that, by taking action to promote the safety of their staff while driving, employers can reduce accident costs, make efficiency savings, improve their public image (a company's drivers are its ambassadors on the road!) boost staff morale and enhance their overall health and safety culture;
- Enhanced action to tackle occupational road risk will make a significant contribution to meeting UK road safety targets and will mean that 'everyone wins' including businesses, their workers, other road users and Society generally; and
- A variety of similar approaches to work related road safety are developing in other countries, including a number of EU Member States (France, in particular appears to have developed an innovative National Action Programme based on their National Insurance system for occupational accidents and diseases).

From discussion to guidance

These arguments were first set out in detail in a RoSPA discussion document that was circulated to 'key players' in February 1996 to stimulate debate. Following a series of high level seminars in 1996/7, RoSPA published its own consensus guidance in March 1998 ('*Managing Occupational Road Risk'*) with input from an expert reference group and funding and support from BT, Cornhill, Esso, Schlumberger, Royal Mail and

Bayer. It contained messages of support from a wide range of influential figures including Government ministers and representatives of the EU, HSC, CBI, TUC, IOSH, ABI and ACPO.

Stoke Court 'declaration'

RoSPA followed this up shortly afterwards by convening a 'summit' of key players at Bayer plc's Stoke Court headquarters. It also undertook a series of 'road shows' around the country to raise awareness of the level of risk, harm and loss associated with 'at work driving'. The Bayer event led to a consensus declaration endorsing RoSPA's approach signed by: Allianz Cornhill Insurance, Association of British Insurers, Association of Car Fleet Operators, Association of Industrial Road Safety Officers, Bayer plc, BNFL, Brake, Confederation of British Industry, Devon County Council, Engineering Employers Federation, Fleet Driver Training Association, Institution of Occupational Safety and Health, Kellogg's Co of GB, Local Authority Road Safety Officers' Association, Royal Society for the Prevention of Accidents, Trades Union Congress, University of Huddersfield, and the Zurich Insurance Company.

The Work-Related Road Safety Task Group (WRRSTG)

In 2000, as part of the development of the Government's national road safety strategy ('*Tomorrow's roads: safer for everyone'*), Lord Whitty (who was then minister responsible for both road safety and occupational health and safety) decided to set up an independent 'Work Related Road Safety Task Group' (WRRSTG) to initiate a national debate and to advise ministers about whether work related road safety should be addressed by employers and regulators as part of OH&S.

The Task Group, which was chaired by Richard Dykes (then Group Manager Director in the Post Office) drew its membership from a wide range of organisations including: CBI, TUC, RoSPA, BRAKE, Local Authorities, road safety bodies, the Police and a variety of Government departments and agencies. Its secretariat was 'nested' with HSE. It published a discussion document which was launched on the HSE website in February 2001. This raised a range of issues which were also discussed at a major conference for key players held at the Barbican in London on 5th April 2001. The conference noted that occupational road risk is a major but still generally neglected issue. In part this is because the Health and Safety at Work (HSW) Act has not been enforced in relation to at work driving because successive governments have regarded road safety law as being more appropriate to achieve safety objectives in this area. On the other hand the conference also noted that, while at-work drivers clearly have safety responsibilities as individuals, what employers do can significantly affect the risks to which they are exposed while on the road as part of their job.

Issues

The Task Group looked closely at a wide variety of issues including:

- the precise number of WR road casualties; their causes, severities, costs, and 'preventability';
- whether injuries in work related road accidents should be reportable under the Reporting of Injuries Diseases and Dangerous Occurences Regulations (RIDDOR) and covered by the police in the Stats 19 form completed at the scene of road crashes;
- how to ensure effective integration of road safety and OS&H law and the balance of employer versus driver responsibilities;

- whether and how employers' duties of care extended to normal (as opposed to abnormal) commuting and the safety of the kerbside workforce
- whether there was a case for introducing an occupational driving licence (which was rejected in favour of recommending that employers assess competence as in other areas of H&S)
- whether there were opportunities for integration with the commercial transport regime;
- if and how effective enforcement liaison could be developed between the HSE and/or police; and
- whether there was a case for production of an Approved Code of Practice (ACoP) (rejected in favour of HSE guidance because not enough was known to provide the degree of authority required to ensure ACoP advice had robust, evidential status in proceedings.

WRRSTG engaged consultants, the Business Strategy Group, to review data on the number of work related road casualties. While available data were sparse, work by BSG confirmed RoSPA's casualty estimates as broadly correct but WRRSTG has suggested that HSE commission further research to discover the precise extent and nature of the work related road accidents and injuries. The Task Group's deliberations also included special risk groups such as occupational motorcyclists.

An 'Evaluation sub-group' of WRRSTG was set up to consider over 250 substantive replies to the discussion document and to help prepare a draft report.

The WRRSTG Report

The WRRTG's report was published on the web in November 2001 (<u>www.hse.gov.uk/road/content/traffic1.pdf</u>). In summary its recommendations are that:

- employers <u>should</u> manage risk on the road as part of H&S;
- HSE should prepare guidance for employers (plus simple case studies for small firms);
- there should be a major campaign to raise awareness over the next 2 years;
- there should be revisions to STATS 19 and RIDDOR;
- work should be undertaken to develop effective HSE and Police enforcement liaison; HSE should pursue further research (into the prevalence, causation, costs and preventability of work related road accidents); and
- more resources for HSE to enable them to take the issue forward.

The clear consensus however was that, in the coming period, the priority was to focus on awareness raising as well as on incentivisation (particularly via insurance). New diagnostic tools and services were needed. Research and development was needed into practical issues such as performance monitoring options, data management, integrating WRRS into training and disseminating best practice. There was also a need to recognise achievement and to promote worldwide learning.

RoSPA input to the debate

Throughout the WRRSTG exercise RoSPA has sought to make a major input to the debate, including making a presentation at the Barbican conference. Some of the key themes on which RoSPA has focused include:

- how to motivate employers to address MORR, including how to communicate the 'business case' (including ethical and reputational considerations) and how to enforce relevant law;
- communicating health and safety management 'system' concepts to fleet and road safety professionals (rather than focusing purely on specific control measures e.g. driver training);
- ensuring effective employee involvement, for example by consulting appointed safety representatives and reviewing road safety performance in health and safety committees;
- the need to avoid prescription and blanket 'one size fits all' approaches, ensuring the tone of guidance is 'goal setting/assessment' based, helping organisations to develop an assessment approach to achieve proportionality;
- from this point of view, while accepting that, in practice, driver training is an important control measure, avoiding the impression that henceforth every atwork driver should get such training, regardless of risk exposure or development need;
- similarly, avoiding unnecessary burdens on small firms and helping them by providing practical advice and case studies;
- the need to stress that effective performance monitoring and data management are fundamental to MORR (no monitoring, no management!);
- using understandings about health and safety culture in the OS&H field to promote 'occupational road safety culture' (both as a determinant of manager and driver behaviour and as a general 'health and safety culture builder'; and
- getting a fair balance of responsibility between employers, managers and employees who are required to drive or work on the road as part of their job, accepting that responsibilities are shared but that employers must establish safe systems of driving for work with senior management leadership by words and deeds (including senior managers' own driving behaviour!).

Throughout RoSPA has argued strongly that, while employers cannot be expected to prevent all work related road crashes, they can take reasonable steps to make them less likely and/or to reduce their consequences. Thus, the focus will need to be on assessing where 'at work' road safety problems are likely to be most frequent or serious and tracking key indicators so that employers and employee representatives can develop action plans and apply cost effective solutions.

Areas of concern

The WRRSTG discussion exercise threw up a lot of practical information, for example on the full range of control measures available. There is clearly concern about issues such as unsafe scheduling leading to inappropriate use of speed and the contribution of fatigue to accident 'at work' road accident causation. There may also be a need to look at health issues, not only the safety impact on driving of health impairments but also ill health caused or made worse by driving such as stress, low back pain, especially in high mileage car drivers etc. (linking with the HSC's 'Securing Health Together' strategy).

Also near the top of the agenda is the debate about how to establish more effective enforcement liaison arrangements between the police, the vehicle inspectorate and health and safety enforcers such as HSE and local authorities. RoSPA would like to see HSE extending its inspection of employers' site transport arrangements to look at their systems and standards for controlling risk on the road. While the police will remain in the lead in investigating road traffic accidents, where it appears that employers have failed to create a safe system of driving (excessive hours, incentives to speed, required use of mobile phones on the move etc) they should be investigated further by HSE and, where appropriate, prosecuted.

The need to develop a risk management approach

Employers clearly have moral as well as legal duties to assess the 'at work' road risks and take 'reasonably practicable measures' to ensure 'safe systems of work' for their drivers. Many practical and cost effective control measures can be put in place, for example:

- getting risks down 'at source', e.g. by exploring safer alternatives to travel by road;
- specification of safest routes;
- setting standards for safe schedules, journey times and distance limits;
- specification of safer vehicles with additional safety features;
- ensuring safe maintenance; and
- ensuring drivers are fit and having suitable driver selection, assessment and driver development arrangements in place to help them to cope with the risks on the road.

What RoSPA has been arguing however is that 'at work' road safety is not just a question of introducing specific control measures like driver training (important as these are). The primary focus must be on ensuring that organisations have a systematic risk management capability, adapting the 'systems approach' to health and safety management advocated by HSE and the British Standards Institution in guidance documents such as HSG65 and BS 8800.

In other words, organisations will not be able to achieve a cycle of continuous improvement in their road safety performance unless they have:

- established and communicated clear road safety policies and objectives;
- specified the responsibilities and competences required to achieve them at every level;
- put in place a planned approach to risk control informed by risk assessment, standards and targets;
- developed arrangements to monitor their road safety performance (actively and reactively by investigating incidents); and

• established a system for feeding back lessons from periodic performance reviews.

In short, managing risk on the road, like managing any kind of work related risk, cannot be achieved by one-off interventions. Organisations need to focus, in the first instance, on the policies, people and procedures (or 'system') which they need to have in place and establish the 'process' for working the problem before trying to find 'solutions'. Two key ingredients for success are clear, visible and committed leadership by senior managers (exemplified in their decision making and in their personal behaviour) and full and effective workforce involvement (including full partnership and consultation with safety representatives). They also need good sources of data (for example on vehicles, journeys drivers and crashes/incidents) to help them assess risks and monitor the effectiveness of interventions.

The HSC's response

The Health and Safety Commission (HSC) considered the Work Related Road Safety Task Group (WRRSTG) report "Reducing at-work road incidents" at their meeting on 14th May 2002 (available on HSE's website as a pdf HSC/02/37 via http://www.hse.gov.uk/aboutus/hsc/meetings/2002/140502/agendas/ca07.htm.) Bill Callaghan, Chairman of the Commission, has now written to David Jamieson, the Minister responsible for Road Safety and other ministers outlining HSC's detailed response to each of the report's recommendations. Essentially what HSC have said is that, while H&S law has application to work on the road, the main focus over the next two years should be on raising awareness of the health and safety issues involved with at-work driving and other work activities in the public highway, carrying out further research and developing new HSE guidance (promised for summer 2003) on employers' duties under the HSW Act and MHSW Regulations. HSE should also liaise with road safety enforcing authorities, including the police, to see how they and Local authority H&S enforcers can work together to investigate and take action following work related crashes.

RoSPA's view

RoSPA is concerned that the HSC have rejected certain recommendations outright (such as the case for a follow up body to WRRSTG and the case for HSE involvement in 'O' licensing) and that it has only accepted most of the others with reservations or qualification. RoSPA is pleased nevertheless that the Commission <u>have</u> accepted that work related road safety (WRRS) <u>is</u> an important topic and that employers <u>should</u> be encouraged to manage the risks involved within the framework they should already have in place for managing health and safety at work. RoSPA also welcomes acceptance by the Commission that they will need to work at this problem over the next few years and, in the light of their findings, review the importance which they attach to the issue within their overall strategy. This should not mean however delaying action unnecessarily until they have completed further research or over-estimating the demands (initially at least) of enforcement.

Priorities?

The dilemma at the base of the HSC's position is that they accept the case for employers to develop a risk management approach to occupational road safety but are (in Bill Callaghan's own words) '... concerned, however about the extent to which such a statement might raise unhelpful expectations about the enforcement role of

HSE and LAs which cannot, in practice, be met'. HSC are clearly committing resources over the next two years (the spending review horizon) to achieving the targets set out in '*Revitalising Health and Safety*'. This includes priority programmes designed to tackle site transport accidents, falls from height and on the level, stress and musculo-skeletal disorders. HSC/E are also focusing effort on improving H&S performance in agriculture, construction and the NHS. Securing a change in these already agreed priorities will require continued pressure, particularly since work-related road risk may be seen as just another demand on stretched resources. It could be argued, for example, that, in current political terms, because work related road casualties are not included in HSE statistics and thus in current targets, spending resources to reduce them is not a high priority because HSC/E progress is being measured against other parameters.

On the other hand, HSC's acceptance of the WRRSTG's case in principle (particularly recommendation 4) and its commitment to begin a limited programme of work opens up a bridgehead. This should enable key stakeholders to press for some of the lower cost initiatives envisaged by WRRSTG which in turn will open up the issue further and thus mean that the HSC must consider the issue in greater detail and press the Treasury for more resources. HSC/E efforts to promote and enforce health and safety at work in fixed workplaces (where employees are under direct managerial supervision) clearly need to be balanced with new initiatives designed to meet the needs of millions of workers who are engaged either wholly or partially in peripatetic work – much of which involves using vehicles as part of their job.

Several arguments need to be borne in mind here;

- The RHS priorities were set before the WRRSTG had been established and thus much bigger issue of work related road safety was then still not 'on the HSC/E radar screen'.
- The 2004 review point for assessing progress towards the HSC/E's RHS targets also coincides with a similar suggested review date in the WRRSTG report. At that point it might be reasonable to see how work-related road safety could be taken into the HSC's revised priorities and also linked with the current priority on workplace transport safety.
- Were HSC to fail to commit to actioning the WRRSTG's recommendations, it is likely that this could result in further public pressure, Parliamentary Questions as well possibly as judicial review of cases in which HSE had decided not to investigate particular work related road accidents.
- The issue is one that clearly demands 'joined-up Government', particularly given the contribution which greater employer action can make to help achieve national road casualty reduction targets ('*Tomorrow's Roads: safer for everyone'*: 40 per cent reduction in numbers killed and seriously injured by 2010). (In this context the targets in TR and RHS need to be viewed in parallel.)
- A wide range of activities to promote occupational road safety are being undertaken in other countries (including in the EU) and exploratory

discussions are taking place within the European Commission on this subject suggesting that the UK should have a clearly developed policy line to advance in any subsequent discussions with other Member States.

RoSPA, together with others, will continue to work to show that, in the existing RHS priority areas (particularly the NHS and Construction - as well as in Government employment) there are almost certainly more deaths and injuries at work on the highway than from the causes which HSE are currently addressing. Leading companies clearly recognise that this is their biggest safety risk. Arguably the HSE will lose credibility if they do not reflect this wider safety agenda.

Making MORR happen!

On 29^{th} April 2002, as part of a 'core group' of organisations, RoSPA helped to convene a meeting of some 40 organisations in road and occupational safety at the Bayer Conference Centre at Stoke Court, near Slough. Discussion, which was chaired by Richard Dykes, focused on the case for setting up an '*Occupational Road Safety Alliance*' (ORSA) involving bodies such as: road safety bodies; motoring organisations; employer organisations; trades unions; professional institutions; insurers; Local Authorities; the driver development sector; the fleet sector; major corporates and others who can help promote and support MORR. (A Steering Group – and smaller planning group - have been set up to develop a programme of work focusing primarily on:

- making a common statement (see annex two);
- developing a co-ordinated approach to communication and awareness raising, for example via a website – <u>www.orsa.org.uk</u> - with hotlinks to information on ORSA members' sites);
- identifying examples of good practice; and
- collating and signposting resources.

ORSA now involves over 60 organisations and plans are being discussed for a combined 'push' to communicate the occupational road safety message in March 2003. It has adopted the logo/slogan 'THINK road safety *at work*' which is downloadable from the ORSA site.

On-going RoSPA work

RoSPA is continuing to develop its MORR services. It will be continuing to run its course on MORR which is aimed at health and safety professionals and fleet/vehicle managers and is based around the RoSPA MORR guidance. RoSPA is also a major provider of driver services, including defensive driver training. Besides continuing to market these services and its MORR package (see annex three 'The RoSPA Occupational Road Risk Product/ Service Suite'), RoSPA is working to develop additional tools and guidance including an 'Initial Status Review' tool (to help organisations to answer the questions 'Where are we now' and 'Where do we want to be?. It has also published three supplementary web-based 'ten point' codes on 'speed' (indicating the approach organisations should adopt to prevent inappropriate use of speed by its drivers); 'fatigue' (preventing falling asleep at the wheel); and 'driver competence' (indicating the approach which they should adopt for driver assessment and development). RoSPA is presently reviewing evidence from companies on the impact of their interventions on crash rates. It has also been undertaking an

international comparisons review, looking at action on MORR for example, in France, the USA and Australia. RoSPA is also developing a range of diagnostic and development tools for companies and other organisations including its 'MORR Review'. It hopes to have a revised version of its MORR guidance ready to launch as part of the ORSA 'push' in March.

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Annex one

Key Developments in the RoSPA MORR Initiative

- 1996 Managing Occupational Road Risk A RoSPA discussion paper RoSPA Focus Seminar - Esso Leatherhead
- 1997 RoSPA Focus Seminar at Engineering Employers Federation Headquarters
- 1998 NOP Solutions survey results published by RoSPA Launch of new RoSPA guidance (30 broadcast interviews, support from Neil Kinnock (EU Transport Commissioner, Baroness Hayman, HSC Chairman etc) High level policy review seminar: Bayer, Stoke Court 'Stoke Court Declaration' Regional surveys and report Road shows (police, local authority safety officers)
 1999 RoSPA MORR course for fleet managers and health and safety advisors launched RoSPA/Zurich one day conferences: March, May, September

Promoting the Management of Occupational Road Risk : A strategic appraisal: submitted to the DETR Proposed set up of an Inter-agency group on MORR and National

- Learning Network
- Publication of Supplementary Guides on 'Driver Competence' and 'Speed'
- 2000 Setting up of RoSPA Initial Status Review (ISR) Group Establishment of WRRSTG
- 2001 Participation in WRRSTG
- 2002 Establishment of the 'Occupational Road Safety Alliance'

Other

Liaison with officials, key players, broadcast interviews etc. Presentations to local groups, conferences, RoSPA congresses etc.

Ongoing Work:

Development of ISR tool Input to ORSA Annex two Occupational Road Safety Alliance



'Managing Occupational Road Safety: an Opportunity for Business'

'The Occupational Road Safety Alliance (ORSA) (visit www.orsa.org.uk) brings together employers, trade unions, local authorities, police forces, safety organisations and professional and trade associations. It believes, in common with the Government and the Health and Safety Commission, that **employers should manage at-work road risk within the framework that they should already have in place for managing all other occupational health and safety risks.**

Research commissioned by the Health and Safety Executive and others concludes that **between 25% and 33% of fatal and serious road traffic incidents involve someone who was at work** at the time. These figures include all categories of road users - drivers, motorcyclists and cyclists as well as pedestrians and those working at the side of the road, suggesting that between 10,175 and 13,512 people were killed or injured in at-work road incidents in 2001.

Reducing work-related road casualties will play a significant part in helping to reach the target for **road casualty reduction by 2010 set by the Government**. It reduces the cost ofroad casualties to the National Health Service and the pain and suffering caused to victims and their relatives. **It also makes real economic sense for companies** as road crashes cost time and money in terms of absent staff, lost production and damage to commercial reputation.

ORSA believes that all employers, large or small, private or public, should seek to develop a **systematic approach to managing occupational road risk** that is appropriate to their business, for example by:

- gathering and analysing key safety and risk data on their vehicles, journeys, drivers, crashes, causes and costs;
- > setting and communicating clear **corporate road safety objectives**;
- > ensuring everyone understands their role in achieving them;
- introducing targeted safety measures based on suitable risk assessment (backed by standards, targets and timescales);
- > monitoring performance and learning from accidents and incidents;
- carrying out periodic performance reviews in order to feed back lessons learned.

They should commit themselves to achieving **a cycle of continuous improvement** in road safety performance, ensuring that this approach is underpinned by a proactive,

positive road safety culture lead by all senior managers with full workforce consultation and participation.

ORSA urges all employers to sign up to this challenge to improve safety on our roads and to share their good practice with all other organisations that share the same vision.'

ORSA Steering Group

September 2002

Annex three

The RoSPA Occupational Road Risk Product/Service Suite

The Society has developed a suite of products to help organisations develop a 'risk management system' approach to MORR and to make specific interventions to improve their fleet safety performance. These are described in summary below:

Guidance

- *'Managing Risk on the Road: the RoSPA guide'*: guidance publication on the case for MORR with practical guidance on how to establish a 'joined up management system'.
- *Mini bus guide*: guidance on safe standards in mini-bus driving.
- *Greener Motoring, the RoSPA guide*: guidance on how to reduce environmental impact of fleet operations and reduce costs.
- Choosing Safer Vehicles: simple guidance on vehicle safety specifications.
- *Safer journey planner:* how to plan safer routes, schedules etc.
- *Ten point codes on 'Speed', 'Fatigue' and 'Driver Competence'* (accessible as pdfs on www.rospa.com)

Review/ Audit Services

- *MORR Initial Status Review*: an initial review of fleet status, policies, people and procedures already in place and recommendations for developing a coherent risk management system.
- *Periodic Audit*: more in-depth examination or MORR within an organisation

Risk Management Skills

- *Managing risk on the road*: a one-day course aimed at managers and safety professionals.
- Accident investigation skills: a one-day course to enhance understanding of post crash data collection and analysis, establishment of immediate underlying causes, and recommendations for action.

Driver Development

- *In-vehicle risk assessment*: assessing driver competence.
- *Defensive driving courses*: focusing on driver attitudes and teaching the 'system' of driving by classroom and in-car tuition.
- *Mini bus driver training*: similarly a one-day course for those required to drive mini buses for ...
- *Chauffeurs' courses*: a specialised course focusing on driver skills and security issues.
- Assessor's course: for those undertaking in-company driver assessment
- *Skid control*: developing vehicle control skills.

Achievement and recognition

- RoSPA Advanced Test : for both car drivers and motorcyclists, BTech accredited
- RoSPA National Minibus test: assessing mini bus driver competence
- National Safe Driving Awards scheme: rewarding accident free driving
- RoSPA MORR Awards: recognising company wide excellence in MORR

Instructor Training

- *RoSPA national Diploma in Advanced Driving Instruction*: nationally recognised qualification for advanced driver trainers B Tech accredited.
- *RoSPA National Diploma in Advanced Riding Instruction*: nationally recognised standard for advanced rider trainers B Tech accredited

Other

- *Human aspects of driving:* explaining factors influencing driver attitudes and performance impairment.
- *Banksman's course:* essential skills for those directing vehicle movements.
- *Personal safety:* awareness and skills course to help protect vehicles and drivers.
- *Videos:* 'Kings of the Road', award winning video now available through RoSPA challenging attitudes to driving.
- *Posters:* designed to raise awareness.

Services

RoSPA's staff are available to talk through organisations' MORR problems and development needs and, where appropriate, to give briefing presentations in-company to key decision makers.

Organisations using RoSPA's MORR services are also encouraged to become members of RoSPA (both its 'occupational' and 'road safety sections') and to attend RoSPA events such occupational road safety congresses. There is also much useful information on MORR and road safety on RoSPA's website (www.rospa.co.uk), including RoSPA policy positions on topical road safety policy issues.