



accidents don't have to happen

# Scotland's Road Safety Framework to 2030

RoSPA's response to Scotland's Road Safety Framework to 2030 Draft Public Consultation

Date: 01 December 2020



## Response to Scotland's Road Safety Framework to 2030, Draft Public Consultation

## Introduction

Information about the consultation response.

It has been produced following consultation with RoSPA's National Occupational Safety and Health Committee and National Road Safety Committee, although the response does not necessarily reflect the views of all committee members.

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**Question 1 – Is the vision set out for the next 10 years the right one?****RoSPA response - Yes****Please explain your answer:**

RoSPA welcomes the bold vision and putting people at the centre allows us to humanise road safety, continuing the narrative from Go Safe on Scotland's Roads- it's everyone's responsibility. It sets out how to translate the Safe System approach into a Scottish context towards the vision of Scotland having the best road safety performance in the world. We appreciate that there will be quantifiable targets which will drive towards a reduction in numbers towards this end. It reflects our mission of exchanging life-enhancing skills and knowledge to reduce serious accidental injuries and our vision of life free from serious accidental injury. It is underpinned by proactive partnership working and with the inclusion of driving and riding for work RoSPA/ScORSA will continue to play its part in delivery.

**Question 2 - Are the outcomes of Safe Road Use, Safe Speeds, Safe Vehicles, Safe Roads & Roadsides and Post-Crash Response to deliver the vision the right ones?****RoSPA response – Yes****Please explain your answer:**

This is the logical step to take. Moving towards the Safe System approach reflects how leading countries, in terms of road safety performance, are managing the risk. Occupational drivers should be seen as an important element of the road safety community. The workplace is a conduit for each of these elements. There is an opportunity to help the workplace understand how the elements connect and influence a whole-person, whole-life (lifecourse) message. We see a lot of these elements and behaviour improvements as encouraging the use of active forms of travel, as confidence in safety increases, and we would support this. In a YouGov survey, commissioned by RoSPA in February 2015: 8% of people said they cycle once a week or more often, 14% said they cycle at least once a month, 23% said they cycle at least once every six months, 18% of people said they cycle less often than once every six months, 58% of people said they never cycle. When asked how much they would like to cycle in the future, 36% said they would like to cycle more than they currently do, 44% said about the same as now, and 3% said they'd like to cycle less often. The main reasons given when asked what prevents them from cycling more often were "concerns around the safety of road cycling" (41%) and "concerns about drivers treating me badly when cycling" (31%). Overall, 39% of respondents said they would cycle more often if cycling on the roads were made safer. These findings suggest that a perception that cycling is not safe is preventing many people from cycling, which means that they are not benefitting from the health improvements that cycling brings. If one of the outcomes of the road safety framework was to encourage more people to choose active forms of travel, such as cycling, and to be able to that activity safely, we would strongly welcome that.

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**Question 3 - Do you agree that the Safe System Approach is fundamental to the success of the Framework?****RoSPA response – Yes****Please explain your answer:**

It will be important to help road users, including those who drive for work, understand what the "Safe System" means and translate it so that each stage is clearly understood away from the corporate environment. It would be useful to have examples of communications messaging from other countries where this approach has already been adopted. To talk of "Safe System" may be helpful in encouraging involvement of other health and safety bodies where safe systems of work are well understood and applied. Establishing a common road safety language will assist in embedding messages that will result in change.

**Question 4 - Are the 12 key challenges for road safety, from Climate Emergency, Health to Emerging technologies and Post-crash response, the correct ones?****RoSPA response – Yes****Please explain your answer:**

The interconnection of these elements is good. It is not a blank piece of paper. The matrix that shows how everything fits together in support of the bold vision. The emerging challenges are given their place. Driving and riding for work have been given their place, as has technology. We welcome the support for road policing. The inclusion of road maintenance with a systematic approach and reviews is important. Our belief is that road safety doesn't stand in isolation from other public health challenges. There is a lot of interconnectedness between topics e.g. health and wellbeing, climate change, noise pollution. Road safety should be approached as a lifecourse subject where road safety considerations are part of a personal daily risk assessment as opposed to being picked up when there is a requirement to learn to drive for example.

**Question 5 - Do you think the strategic actions will deliver the outcomes and address the identified challenges?****RoSPA response – Yes****Please explain your answer:**

We believe the whole-person, whole-life approach will benefit road safety in the workplace. RoSPA has a focus on MORR - Managing Occupational Road Risk - including through its management of ScORSA - Scottish Occupational Road Safety Alliance. Some of the actions could be more considered, with detail about how they will be delivered. From a RoSPA perspective, we see the benefit of these strategic actions. However, given our experience of the road safety environment, each action will need to be looked at in detail to consider the best way to deliver. For example, on technology - there are different types of technology that can contribute to improving road safety. Vehicle technology - such as systems that aid driving and can reduce the risk of a crash, or which reduce the



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severity of a crash - have been hugely influential in recent years. Telematics systems that can monitor driving or riding and inform interventions, either at the level of an individual road user or across a company, can also be positive influencers for safety. Consideration also needs to be given to developments in electric and autonomous vehicles, and how these will change the road safety agenda going forwards.

**Question 6 - Are some of these actions more important than others?****RoSPA response – Yes****Please explain your answer:**

It is well established that an effective approach to road safety consists of different elements working together e.g. the three Es of education, enforcement, engineering/environment, and this should continue to be promoted. RoSPA believes that segregated spaces are particularly important for the safety of vulnerable groups such as pedestrians and cyclists, but recognises that these are not possible everywhere. A holistic approach is what we would want to see, working with a network of proactive partners who have specialist understanding.

**Question 7 - What are your views on the proposed 2030 Interim Targets?****RoSPA response: Yes****Please explain your answer:**

We believe these are realistic and achievable but they also shouldn't hold back any emerging bold opportunities to press on more quickly to Vision Zero. We would like some measurement of active travel to ensure reduction in casualties is not due to people not travelling in an active way.

**Question 8 - Do you think that the Intermediate Outcome Targets and Key Performance Indicators are appropriate to monitor the progress towards the 2030 interim targets?****RoSPA response: Yes****Please explain your answer:**

Despite the impact of the bold overarching target of Scotland having the best road safety performance in the world, these are very "fatal four" focussed - seatbelts, drink and drugs, speed. However we do understand the probable reasons for this e.g. they are targets we know how to measure; there are no unknowns. We would also like to see KPIs for environment, enforcement, modal shift, people travelling in different ways. We welcome inclusion of a KPI on the amount of time for emergency services to reach an accident.



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**Question 9 - Do you think that the proposed Governance Structure is appropriate?**

**RoSPA response: Yes**

**Please explain your answer:**

This tiered approach looks interesting and from a ScORSA perspective we have been trying to identify a method of supporting the network, as a conduit for partnership messaging involving road safety in future grass roots engagement.

**Question 10 - Would road safety performance be improved across Scotland as a result of systematically sharing information and best practice between local authorities and/or local/regional partnerships through Local Partnership Forums?**

**RoSPA response: Yes**

**Please explain your answer:**

At RoSPA, we champion information-sharing and co-ordination to achieve shared goals. Indeed, our mission is focused on "exchanging" life-enhancing skills and knowledge. We would therefore welcome the opportunity to become part of such a network.

**Question 11 - In your opinion what aspects of road safety work well at the moment?**

**Please explain your answer:**

**RoSPA response:**

We see huge value in employers being seen as a crucial part of the road safety community, able to influence change to the benefit of the whole system. Our work on MORR generally and ScORSA specifically has demonstrated to us that employers are interested in a whole-person, whole-life approach to road safety.

**Question 12 - What practical actions would you like to see taken to encourage and promote these aspects?**

**Please explain your answer:**

**RoSPA response:**

More support to take road safety messaging out through employers. Network mapping - so that people can see how the support system works and who can deliver assistance. The "workplace as a conduit" is central to sharing what works well. Any actions taken should be evidence based and evaluated.



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**Question 13 - In your opinion what aspects of road safety do not work well in general and as a result of Covid-19?**

**Please explain your answer:**

**RoSPA response:**

At the moment, in general, in the UK there is no general acceptance that road safety should be a whole-person, whole-life subject. For many, it is seen as a one-off training event - learner training and then gaining a driving licence. We know that there is sometimes an "us and them" mentality on the roads, with differences between road user groups promoted, rather than the shared sense of everyone being a road user. Previous reliance on face-to-face training has required flexibility during the pandemic. It has been important to stay visible and connected, which ScORSA and RoSPA have attempted to do, for example promoting advice and information on fatigue. We have had concerns about the halting of learner driver training, and by association other forms of driver training, at various times since March. This has been disruptive to learners and other trainees. We have also been concerned about the suspension of the D4 checks. Driver health should be at the heart of future considerations. We are very interested in the impact of the drink-drive limit change and how it has affected life in Scotland. This will be crucial in taking forward calls for a lower limit in other parts of the UK.

**Question 14 - What practical actions would you like taken to overcome these aspects?**

**Please explain your answer:**

**RoSPA response:**

Energise the system. Support with the right assets. Change culture and behaviour by starting road safety education in schools, helping children and young people understand that it is a continuous cycle throughout life. Funding for behaviour change research. A visible demonstration of how all the different elements of road safety come together in support of the new framework, enabling mapping across different issues and also highlighting the links between road safety and other issues on the public health agenda.

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RoSPA has no further comments to make on the consultation process, other than to thank the Scottish Government for the opportunity to comment. We have no objection to our response being reproduced or attributed.

