



Submission on draft South Australia's Road Safety Strategy to 2031

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Road Safety Policy and Projects

Department for Infrastructure and Transport

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Thank you for the opportunity to provide feedback on the draft South Australia's Road Safety Strategy to 2031 (the draft strategy).

As South Australia's Commissioner for Children and Young People, my mandate is to promote and advocate for the rights, interests and wellbeing of all children and young people in South Australia, with particular regard to those whose voices are not usually heard.

Children and young people across metropolitan and regional South Australia recognise the importance of transport and infrastructure in their lives. They talk about safe, affordable and accessible transport as key to their participation and connection to school, health and other services, sport, workplaces, social activities and the people and places they care about in their communities.

As reported in my Things that Matter Reports, children as young as 8 years old have raised issues related to road safety. No matter where they live, children and young people want safer roads and footpaths so they can safely walk, cycle, scooter or skate, as well as safe and reliable access to public transport.

"make roads safer for people who ride bikes."

– 9 year old, Murray and Mallee

"make sure our roads and footpaths were safe for children and families so that there were less car accidents per year." – 10 year old

They are worried about unsafe cars, car crashes or being injured by cars and heavy traffic around their schools. As noted in my earlier submission on this Strategy (October 2020) and my Hopes and Dreams Report, children and young people living in regional South Australia are particularly concerned about the safety of infrastructure in their communities. They want to see upgraded roads and bike tracks, as well as changes to speed limits, to reduce car accidents and improve road safety in their communities.

"[I worry about...] cars that don't work"

– 9 year old, Barossa, Light and Lower North

"[I worry about...] getting hit by a car"

– 12 year old, Yorke and Mid North

"place more bike tracks so cars don't Bash Into them" – 10 year old

"change some speed limits so that adults are driving safer." – 8 year old

"put more under passes under main roads and normal roads." – 11 year old

I commend the draft strategy's focus on improving outcomes and safety for young people in the State. In particular, I commend the following:

- Public awareness campaigns and education specific to younger drivers including influencing the rate of uptake of safer vehicles.
- Research to better understand why regional and remote younger drivers and riders are overrepresented in serious crashes.
- Targeted road safety education and messaging to address dangerous behaviour among younger drivers and riders.
- Driver and rider training being strengthened so that novice drivers and riders have more effective training and experience to identify and undertake safe driving practices.

Given the disparity in road safety outcomes between metropolitan and regional parts of the state, I also welcome the draft strategy's focus on young people living in regional and remote South Australia.

In light of the above, I make the following recommendations to ensure that there are no gaps in the final strategy when it comes to road safety issues that affect children and young people, particularly younger children. Specifically, I recommend that the final strategy includes actions to:

- 1. ensure efforts to improve access to safe active and alternative transport that has a child safe and child friendly focus.**
- 2. improve access for families to safe child restraints and ensure that approaches to public awareness about correct use of child restraints are tailored for different age groups.**
- 3. reduce the number of deaths of young children killed by vehicles at their own home or driveway.**
- 4. provide more support for young people to get their Learners licence.**
- 5. improve vehicle safety and provide support for young drivers to purchase safer and newer model cars.**
- 6. review exemption criteria for P-platers from passenger and night-time driving restrictions with a view to allow greater exemptions in certain circumstances.**

These issues have come to the attention of this office through conversations with children and young people and engagement with stakeholders and are discussed in greater detail below.

The Department for Infrastructure and Transport's work, including this strategy, directly affects the lives of children and young people. As such, their views as citizens, stakeholders, pedestrians, passengers and road users are worthy of consideration. If you have any queries, please do not hesitate to contact this office.

Yours sincerely,



Helen Connolly
Commissioner for Children and Young People

1. Ensure efforts to improve access to safe active and alternative transport has a child safe and child friendly focus.

Children and young people's experiences of public transport services was the focus of this office's ***It's Not Fine*** report, which highlighted the need for child safe and child friendly transport systems, that are affordable for everyone and free for families living in poverty.

This office commends the work undertaken by the Department since this report's release, including the development of a Diversity and Inclusion Strategy and several targeted action plans, including one dedicated to students and young people.

There is scope for this draft strategy to apply a similar child safe and child friendly focus to improve access to safe active and alternative transport, not only public transport but also for children walking, cycling, scootering or skating.

Consistently, children and young people have said that they want safe, affordable, efficient and convenient public transport services and safer roads and footpaths for cyclists, skaters and pedestrians. They recognise that the better alternative transport services and infrastructure are, the less cars on the road, resulting in safer streets, especially in urban areas.

"if I was premier I would remove a few car roads and replace them with tram lines. This would allow children to be more active and social [...] and also help with pollution."

"Lower the speed limit in city - Safer for pedestrians and cyclists"

"For certain people transport should be free, people that cant afford it, kids", "it's vital we need it to go to school", "encourage kids to go to school."

Before they get their drivers' licence, children and young people rely largely on public transport and bikes, scooters and skateboards – often a combination of both – to get around. They describe the challenges they face when they live far away from public transport stops or stations, but they are not allowed to or cannot afford to take their bikes, scooters or skateboards on board public transport.

"Should be able to take bikes on trains without playing for an extra ticket for the bike." – Young Leaders (youthful cities) group

This office understands that bikes and skateboards are able to be taken on board if there is room, but it appears children and young people are not aware of this. Thought should be given on how to ensure children and young people are informed about how active and alternative transport options work, and what changes to infrastructure might be necessary to ensure these options are safe and accessible. In other countries, for example, trains have carriages to store bikes.

"Roads just for bikes with no cars. Less cars on the road" – 17 year old

"Safer bike lanes." – 16 year old

Children and young people also highlight the need for services to be trustworthy, welcoming, regular and efficient, including within regional areas and better links from

regional communities and the outer areas of Adelaide to Adelaide itself, both for work and social activities.

*“TRAVELLING TO ADELAIDE IS TOO HARD!!! Bullet train to Adelaide (& other cities?).”
– 16 year old*

“You can’t get a job outside of the hills unless you have your licence (better public transport please).” - 17 year old

“Transportation – a more consistent transportation system so youth and any one for that matter can get to Adelaide or Gawler to shop, work, complete courses, hang out with friends and live, just live!” - 14 year old

“The Barossa Area needs more frequent, affordable and accessible (Accessible) public transport for the youth so getting to Gawler train station is easier and getting places in the city becomes less of a hassle. – 18 year old

2. Improve access for families to safe child restraints and ensure approaches to public awareness about correct use of child restraints are tailored for different age groups.

I commend the draft strategy’s commitment to improve public awareness about the use of child restraints and to explore and address the barriers to child restraint use.

When exploring the issue of practical barriers to child restraint use, consideration must be made to the affordability of the products, especially for families or parents with a low income or living in remote and regional South Australia. Further consideration and practical financial support should be provided to parents and families to ensure easy and affordable or free access to appropriate booster seats and other child restraints.

Although this office is aware that there have been programs in the past dedicated to providing child car restraints to parents who would have difficulty purchasing them, from this office’s research and inquiries there appears to be no evidence to suggest that there are any programs operating in South Australia at this time.

Further, this office is concerned that the draft strategy does not tailor approaches to improve public awareness about the correct use of child restraints to different age groups, with a particular focus on children aged 7 to 12 years old, who are often prematurely transitioned to inappropriately sized booster seats or to adult seats. As noted in the RAA’s Child Restraints Fact Sheet, “What happens after 7 years of age?”.

“The average seven year old cannot fit an adult seatbelt correctly, in fact, most children cannot wear the adult seatbelt correctly until 10 to 12 years of age... Children that move into an adult seatbelt too early are twice as likely to suffer devastating injuries in a crash.”ⁱⁱ

3. Reduce the number of deaths of young children killed by vehicles at their own home or driveway.

This office is concerned that the draft strategy does not mention driveway deaths or the deaths of young children by vehicles at their own home.

The Child Death and Serious Injury Review Committee have noted that there were four driveway deaths of children in South Australia in 2019 alone. Their research has also indicated a potential increase in driveway runovers, which typically involve large SUVs. Such deaths are tragic and horrific, but they are also preventable.

While the Department for Infrastructure and Transport have acknowledged this issue elsewhere as part of Towards Zero Together efforts, the final Road Safety Strategy should reflect this and prioritise actions that increase awareness about driveway safety and protect South Australia's youngest road users.

4. Provide more support for young people to get their Learners licence.

Currently, the conditions and costs for young people to get their licence are prohibitive. More support should be given to young people to afford their licence and to clock up the required number of hours on the road.

"Some people don't have anyone to help them get their L's and do all their hours. They shouldn't change the rules to two years on their L's. People on their P's should be allowed to drive after 12am for work and other commitments (Commitments). It's too expensive for youth." 17 year old

When young people do not have access to a car or an eligible adult who is willing and able to supervise them for the required number of hours, it can restrict them from reaching their full potential as active and productive citizens in their community. These barriers disproportionately impact young people living in regional areas, who describe already being at a disadvantage when it comes to access to transport and work in their local community or closer to Adelaide.

Young people describe the importance of having their licence to getting and keeping a job or apprenticeship, accessing further education or sports as well as enabling them to socialise, assist their family and be independent.

"Becoming my own person, getting my license, becoming independent, having goals and things to look forward to." – 17 year old

"I want to pass my driving licence because I want to drive and then my mum and dad won't have to take me everywhere because we live out of town." – 13 year old

There are some organisations that support young people to get their licence, including the Youth on Wheels program supported by District Council of Grant, and the Wheels in Motion program run by Salisbury Council. The draft strategy should develop actions to expand these types of programs in other areas across South Australia, especially in low socio-economic and regional areas. This should be a particular priority where resources

are invested as the evidence shows that Learner drivers who have around 120 hours of supervised practice are safer drivers, and driver defence classes also result in safer roads.ⁱⁱ

5. Improve vehicle safety and provide support for young drivers to purchase safer and newer model cars.

The draft strategy notes that most young people cannot afford newer and safer cars. However, the draft strategy does not appear to address how young people are able to access safer or newer cars.

While the draft strategy recognises that cost is a barrier to safe vehicle use, the proposed solution appears to be limited to ‘consumer awareness’. Education and consumer awareness are important, but likely to be insufficient without practical financial support. In most cases, it is likely that young people driving older cars are aware their car is not as safe as it could be, but they currently have no other choice if they cannot afford a safer (more expensive) option.

It is recommended that governments provide more practical incentives and financial support to ensure that older or unsafe vehicles are taken off the road and to encourage uptake of safer and newer models that have more safety features.

This can be done through incentive schemes resourced by the government that support young people to afford safer cars. Potential strategies include subsidising the purchase of a vehicle through a low interest loan scheme, whereby governments would match the amount a young person has already saved for a car to support them to afford a safer model.

There could also be increases in safety checks, when purchasing a new car or re-registering a vehicle and offering young people free vehicle safety checks if they are purchasing a used car, particularly young people in low-income families or living in regional or remote South Australia.

With the exception of cars that arrive from interstate, South Australia has no provision to check a car’s safety when it is sold, especially for older vehicles. This state can consider what other states, including NSW and Victoria, do with regards to conditions that limit the re-registration of vehicles over a certain age to ensure that vehicles remain safe.

6. Review exemption criteria for P-platers from passenger and night-time driving restrictions with a view to allow greater exemptions in certain circumstances.

The action in the draft plan to improve driver and rider training being strengthened, so that novice drivers and riders have more effective training and experience to identify and undertake safe driving practices is commendable. In light of these actions and any successful implementation of this program, an increase in safe cars on the road may make it an opportune time to include in the strategy a review of the exemption process for P-platers.

Young people, especially in regional areas, have raised concerns about the inadvertent effects of the passenger and night-time driving restrictions for P1 drivers. They describe the passenger limits increasing the number of cars on the road, and the designated drivers only being allowed one passenger, reducing the number of peers they can safely drive home after a party, for example.

Young people have also said that they feel restricted to obtain work, go to sporting activities and other activities simply because they are unable to get around and take their friends and colleagues, particularly where there is no reliable public transport or alternative transport option. They are asking for exemption criteria to be reconsidered as well as more information about the circumstances in which exemptions are available.

Improve traffic and road safety around schools.

This office welcomes Key Strategy 43 to work with local councils to design ‘safer community and pedestrian precincts’, including schools. This office is concerned this strategy may be too narrow and vague, particularly given the state-wide transition of Year 7s into high schools in 2022.

It is recommended that the Department take a broader systems approach to improving traffic and road safety and infrastructure around schools. This requires working with school communities, children and young people, families and Governing Councils to understand their concerns and potential solutions to improve road safety in their local context.

In their postcards to me as Commissioner, many children have reported that they currently do not feel safe when arriving and leaving in schools due to the traffic at those times and they have solutions for what it would make it safer when arriving and leaving schools. They want cars to slow down even more, traffic crossings and safer footpaths and bike lanes. Governing Councils have also raised this as an issue requiring a response from the Department for Transport and Infrastructure as well as Education.

“slow down the school zones”
– 10 year old, Eastern Adelaide

“I would put a school bus sign across the road Because cars go past fast and us kids are just trying to get across safely to get to school.”
– 10 year old, Fleurieu and Kangaroo Island

“get dirt roads into bitchamen so I can ride to school”
– 10 year old, Fleurieu and Kangaroo Island

ⁱ RAA, Child Restraints Fact Sheet: What Happens after 7 years of age? Available at <https://www.raa.com.au/-/media/Project/RAA/Web/Files/Motor/Safetyandadvice/child-restraints-fact-sheet--what-happens-after-7-years-of-age.pdf?la=en&hash=5B0979EF04609B7DBC8CE7780D8BACDE>.

ⁱⁱ The Driver’s Handbook – Young Drivers, accessed at [My Licence - The Driver's Handbook - Young drivers](#) on 31 August 2021.