

Drive Excellence

Auditing Fleet Safety Process to Manage Risk

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Auditing: The word can scare the most seasoned safety professional. The fear of finding the unknown has kept many people from performing the necessary task of reviewing and examining the policies and procedures put in place to keep people safe. Compare this to not seeing a doctor for fear of the diagnosis.

An audit is defined as a systematic, methodical review of safety policies, procedures, rules and regulations. The goal is to determine how current systems are working and whether they can be improved through revision, reworking or revocation. An audit is not simply:

- a checklist;
- an inspection;
- a discipline tool;
- something done on an ad hoc basis.

A checklist is a tool, often used during an audit to ensure that the auditor remembers everything s/he needs to assess. For example, a checklist may be used to determine whether the site has



enough fire extinguishers or whether safety meetings were conducted. An inspection is another tool to evaluate things and behaviors. An inspection provides a snapshot of current conditions but does not validate whether systems and procedures are working properly and if not, why they are not.

When performed correctly, audits provide an assessment of the overall management system in place to manage the fleet and fleet risk. Audits may be formal or informal, and may be conducted by external or internal auditors. An example of an informal audit is one performed routinely by a supervisor with oversight responsibilities. By design, formal audits yield a final written work product that should be reviewed by those held accountable for policy implementation. Once language is agreed on, the report should guide corrective and preventive action plans.

IN BRIEF

- Learn why fleet audits are important and how to manage a fleet-focused audit process.
- Explore the scope of an audit and identify elements of a comprehensive fleet audit.
- Define a comprehensive fleet audit process that may be used to identify findings that help drive change and develop effective corrective and preventive actions.

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Top management buy-in is essential to successful outcomes for any audit. Auditors strive to outline ways to conduct audits and gain top management support. Top-down-driven change is important for safety management success in any safety area. When leaders support improvement and a strong safety culture, employees benefit. This is especially critical for fleet management because motor vehicle crashes are the leading source of death and injury in the U.S. (BLS, 2017).

Fleet Audits

Supervising drivers, whether commercial or occasional company drivers, is a unique experience because the activity occurs outside of the regular scope of supervision. Once the driver leaves the yard, direct supervision ceases. The methods by which a supervisor can learn how well that employee performs, such as a toll-free number for reporting feedback on the driver, or various technology devices that can be added to the vehicle to collect data, may or may not be useful.

Managing a fleet presents many risks that a good fleet manager understands and manages. Recognized responsibilities include vehicle selection and acquisition, on-time delivery, proper maintenance of equipment, customer and employee satisfaction. Managing fleet risks is not the same as managing the day-to-day operations of a fleet. It requires a good understanding of risk and liabilities as well as road and driving hazards. It requires an understanding of supervisory techniques, training, evaluation of reports of incidents and ways to mitigate them.

ANSI/ASSE Z15-2012, *Safe Practices for Motor Vehicle Operations*, is a great tool for developing a comprehensive set of fleet policies and procedures. The 2017 update to ANSI/ASSE Z15 has been approved. The authors recommend reviewing the standard and determining how concepts may be applied effectively to enhance fleet management. Section 3.2.1 of the standard lists the elements of a good fleet safety manual. The final element listed is program management audits.

Figure 1 (p. 32) depicts topics from the standard that should be included in a fleet program audit. In addition, regular supervisory audits should occur ad hoc throughout the work week, month and year. Articles that provide additional resources are available in ASSE's Safety, Health and Environmental Body of Knowledge.

Audits not only offer an idea of compliance, they also provide insight to support other program elements, such as recruitment/hiring, orientation and training, vehicle maintenance, and maintaining and reporting incident rates to the management level. For regulated fleets that fall under Federal Motor Carrier Safety Administration (FMCSA) regulations, audits may be used to determine a company's level of compliance with new rules. Audits help determine the current level of compliance with regulations so employers can correct issues to ensure that noncompliance does not affect the ability to perform work.

The importance of audits is clear. How they are conducted and whether they produce the necessary

change depends on the OSH professional's ability to get buy-in from all levels affected by them. Audit results offer guidance on who, where, when and why a company needs to change. Sometimes they can also guide how to change.

Facilitating Buy-In

The OSH professional should initiate garnering support for improving fleet risk management before beginning the audit. The first step is to identify the key stakeholders. They may include the fleet manager, human resources, sales executives, drivers, supervisors, safety professionals, risk managers and external vendors managing parts of the fleet program such as vehicle acquisition and maintenance. Engage key stakeholders early with the genuine intent to identify strengths and gaps in how they currently manage fleet risk. Ask open-ended questions and take time to learn what stakeholders care about. Actively listen to their concerns about vehicles and fleet program/process elements. Seek to understand their unique challenges and identify whether high-influence stakeholders care about specific hot spots. Engaging high influence stakeholders is critical to champion improvement and initiate momentum. Reinforce that the ultimate goal of an audit is to identify strengths and gaps to drive continuous improvement tailored to fit their specific concerns and needs. Finally, encourage the fleet manager to build relationships with high-influence stakeholders within their organization. These individuals are respected, so actively engaging these key influencers drives sustainable improvement and will make the fleet program owner's job much easier down the road.

Managing Fleet vs. Managing Fleet Risk

Fleets may be managed internally by a fleet manager, externally by a management company, through a combination of both or they may not be actively managed at all. Identify how vehicles are selected and acquired, and who makes decisions. Next, seek to understand how other aspects of the fleet are managed. Finally, explore whether and how fleet risk is managed.

Overview of Fleet Safety Audit Process

An effective audit begins with planning, communication and defining the audit scope. Decisions must be made on the following:

- auditors: internal or external resources;
- audit scope:

1) motor vehicle operations to be evaluated: all types of vehicles across the corporation, regulated vehicles (e.g., commercial vehicles, property or passenger), nonregulated vehicles (e.g., passenger vehicles used for sales, service/installation or other business use) and nonowned vehicle operation;

2) business units to be evaluated: evaluate how a business unit manages fleet safety across regions or contrast with other divisions or business units;

3) domestic or global operations;

• identify key stakeholders: executive champion, safety, fleet managers, operations, drivers, supervi-

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FIGURE 1
Using ANSI/ASSE Z15.1 as an Audit Guide

External and internal auditors	Current process for managing fleet	Identify key stakeholders
Types and number of vehicles	Selection and acquisition of vehicles	Vehicle use (e.g., carrying items, miles per year, type of driving)
Inspections, repair and maintenance	Incident reporting and investigation	Driver qualification
Policies and procedures	Performance evaluation (success metrics)	Training and communication

Sample Focus Group Questions

- 1) Is fleet safety a part of your safety strategic plan? How is it documented/demonstrated to the workforce?
- 2) Are there formal, annual fleet safety and health goals for the facility? Describe.
- 3) Are there safety performance objectives for reaching these goals for yourself and your direct reports? Describe.
- 4) What was the fleet safety program's performance for the last reporting period?
- 5) What priority do you give to fleet safety and what do you think supervisors/employees give to it? Pay on commission basis: any impact on fleet safety?
- 6) How are fleet safety issues communicated to the workforce? How does the employee get involved? Describe or give examples.
- 7) Effectiveness of current fleet safety training?
- 8) Do you or your direct reports participate in the fleet safety program? How and how often?
- 9) What fleet topics have you covered in toolbox talks in the past year? Describe how you track topics covered in monthly safety meetings and toolbox talks.
- 10) What is working well in fleet safety? What do you think has not worked so well?
- 11) What types of unsafe driving behaviors are being reported or observed by "driver's alert" notification calls and during behind-the-wheel observations? Give examples and why they are occurring.
- 12) How does your company ensure that vehicles are in safe condition? What kinds of deficiencies are identified in vehicle inspections? How do defects get corrected? Give examples and why they are occurring.
- 13) Effectiveness of current vehicle incident investigation/root cause analysis? Give examples of some recent ones, top fleet loss trends for this location.
- 14) Do you observe employees driving, loading vehicle, leaving for route, use of seat belts and mobile equipment use; coach them to improve, praise and recognize positive safety actions?
- 15) Describe the resources you have to address fleet safety.

sors, risk management or external vendors used in vehicle management/incident management.

Work with key stakeholders to define the audit scope, then communicate what topics will be covered in the audit and an overview of the process. Start building communication information (e.g., stakeholder and audit team names and contact information). Develop a preaudit letter that contains an overview of the audit scope, process and documents to be reviewed. Obtain key policies such as motor vehicle safety policies, orientation training materials and vehicle schedule ahead of the audit so that auditors can review the information and become familiar with the organization's basic fleet safety process before the audit begins.

Methods During the Audit

Opening Conference

Begin with an opening conference. This helps provide focus to reduce scope-creep, which can waste valuable time during the audit. It also establishes expectations for outcomes (if not established before the audit) so adjustments can be made if participants or clients have different ideas.

Audit Checklist

Use a checklist to guide document reviews and lead structured interviews. Checklists provide a systematic approach to confirming the effectiveness of systems currently in place to manage fleet exposures. Examples of fleet interview questions are:

- Have policies and procedures been established to address fleet safety?
- Has the policy been communicated to staff at all levels?
- Does senior management actively support the policy? How is this demonstrated?
- Has a fleet safety action plan been established?
- Has it been communicated to all relevant staff?
- Is a named senior director responsible for fleet safety?
- Are staff members, who are responsible for drivers, held accountable for fleet safety performance?
- Have policies/procedures been developed to address owner/operator or leased drivers? Describe.
- Do new drivers receive training about fleet safety policy and defensive driving prior to driving on company business? Document who is responsible for conducting training and describe driver orientation program elements.
- Do new drivers complete a ride-along with a manager/supervisor or designee as part of orientation? Is behind-the-wheel instruction provided for weak driving skill areas?
- Do drivers receive updates that communicate trends for driver programs, vehicle losses and safety awareness?
- Are motor vehicle report records pulled for drivers? If so, how is the data used?
- Are safety meetings held periodically that include fleet topics provided for drivers? Cite examples and meeting frequency.

- Does training focus on organization-specific incident causes (e.g., backing, left turns, following too closely, intersections)?

- What is the policy for mobile device use?
- Is a training program specific to distracted driving employed?

- Is a driver improvement program employed when remedial training is required?

Records Review

On-site records review involves validating that the organization has adequate records to support motor vehicle safety policy elements in the area of driver selection, driver training, management support, route management, vehicle inspection/maintenance and how accidents are reported and investigated. The focus of a records review will vary depending on whether the audit is being conducted on regulated vehicles or nonregulated vehicles.

- Regulated vehicles have required documents to maintain for driver qualification, hours of service, vehicle maintenance/investigation, drug and alcohol testing, and roadside violations. Record reviews for regulated fleets are more comprehensive and involve evaluation of required documents to comply with FMCSA regulations.

- The nonregulated fleet review will not have required records but should rely on best practices as outlined in ANSI/ASSE Z15.1, Safe Practices of Motor Vehicle Operations. Does this type of fleet have fleet safety management systems established to: address driver selection, high-risk driver management, training on defensive driving techniques, distracted driving, behind-the-wheel coaching, new hire/refresher/remedial training, vehicle selection/maintenance, journey management, incident investigation and management leadership?

- Records review involves gathering supporting documents and a systematic review of documents to gain an understanding of the level of compliance to standards and adequacy of risk controls.

- Identify safety metrics established to measure effectiveness of the motor vehicle safety management process. Examples include:

- 1) Commonly seen lagging indicators: crashes per million miles, preventable crash rate, trending of incident costs for auto liability/property damage, 3-year cost for injuries caused by motor vehicle crashes (gathered from the workers' compensation carrier).

- 2) Commonly seen leading indicators: percentage of drivers trained and type; behind-the-wheel coaching, computer-based, hazards perception training, telematics events coached, benchmarks established for selected telematics events such as harsh braking events, seat belt use, speeding, closure time on corrective action plans established from motor vehicle investigation.

Conducting Interviews, Focus Groups & Discussions With Drivers

Interviews are a form of verification strategies that play a key role in conducting effective fleet assessments. The assessment team must under-

stand not only what programs are in place, but also how well they are implemented and understood by management and drivers. Focus groups provide an excellent modality to verify integration and effectiveness of written programs and policies. Reviewers need to exercise professional judgment in determining the exact number of samples or interviews to take, as well as the method of sampling or types of interview questions. This will be based on the criticality of the element to the location and risk or potential impact of noncompliance.

Schedule interviews with various individuals at all levels. Focus groups are useful to gain an understanding of how managers, supervisors or drivers view the current safety and claims management process (see sidebar for sample questions). Management and supervisor questions should focus on how fleet safety accountability is handled at the local level, safety initiatives and specific actions that contribute to fleet safety implementation. Typically, separate focus groups are held for managers, supervisors and drivers. Management team interviews should be conducted in small groups or one-on-one. Group interviews are effective for both supervisors and drivers.

Post-Incident Procedures

When evaluating post-incident procedures, the auditor will determine whether the organization has a standardized incident reporting procedure, forms and instructions for drivers, dispatch, supervisors and internal claims staff. Obtain copies of incident logs and 10 to 20 recent incident reports. Another option is to ask to see the past 12 months' incident reports. When reviewing reports, evaluate the effectiveness of the investigation, whether comprehensive information is included in the report (e.g., root cause), and whether information in the report matches the description in the incident log. Evaluate whether information gathered meets what is outlined in company procedures.

Next, determine what the organization does with the data. Is data simply reported to the insurance carrier or third-party administrator to pay the claims and repair the vehicles? Or, is data used to conduct loss analysis to identify incident trends and root causes, and develop corrective and preventive action plans? Can the organization demonstrate how the management team gets information on incidents? An effective post-incident analysis response will include scheduled management reports on crash trends, root causes identified, initial actions taken and crash countermeasures developed and communicated.

Closing Conference

It is important to share initial findings with the organization during a closing conference. Prepare a brief presentation to highlight:

- goal of assessment;
- activities completed during the audit (e.g., number of perception surveys completed, interviews with management team and drivers, programs/documents reviewed, number of vehicles surveyed);

When conducting a fleet audit, it is useful to begin by understanding the business challenges at a high level.

- identified strengths and opportunities (begin with strengths and best practices);

- review next steps, report preparation, timeline, meeting to review the report and corrective or preventive actions required or strategy planning.

The audit report should provide details of assessment observations and findings. The report outlines a professional opinion of how well the organization is complying with regulations (where FMCSA applies) and its policy standards. In addition, the report identifies policy gaps and adequacy of risk controls, examines how the company uses incident investigation causal information, key trends for loss data and issues, and develops recommendations. Recommendations should be prioritized by level of importance. Work with the client to validate report distribution and schedule a follow-up meeting to review the report and develop tactical plans and strategies for corrective and preventive actions.

Simple Audit Techniques

When conducting a fleet audit, many techniques can be practiced to improve information gathering and positively impact interviews. It is useful to begin by understanding the business challenges at a high level. Interviewing is an essential skill for auditors, as they seek to understand how fleets and fleet risk are managed. When possible, interviews should be conducted in a comfortable setting. Posture should be relaxed and open. Leaning forward and making eye contact (if culturally appropriate) helps put the interviewee at ease. Ask open-ended questions that cannot be answered with a simple yes or no. Listen actively and quietly. Avoid the urge to share personal stories: this interview is about the fleet. Take a moment to reflect and ask follow-up questions when further detail is needed. Moments of silence are okay and allow the other individual to gather their thoughts. Take photos during the interview. These may be used during the closing meeting to show others how conclusions were drawn and will teach them to see what you see. These can provide coaching moments when the auditor can facilitate commitment and engagement.

Supervisory Audits

Auditing is far too often left to a safety official to determine the level of compliance within an organization. It may be conducted annually with significant investment of time and effort to report findings and make corrections.

By the nature of their position, however, supervisors are charged to be an auditor. When supervising a large commercial fleet, it is crucial for supervisors of professional drivers to incorporate auditing techniques into their daily schedule. Doing so helps manage the fleet as well as manage the regulatory compliance as noted.

Auditing at the supervisory level also presents the fleet manager with a long list of leading indicators of safety. For example, if we agree that poor maintenance can lead to increased stopping distance, loss of steering and tire blowouts, then failure to complete adequate pretrip inspections

should be an early indicator that an incident may result from one of these maintenance issues. If we know that drivers who fail to wear seat belts have an increased risk of injury during a crash, monitoring for seat belt use on a daily basis can result in the desired rate of use and help prevent injuries.

This is where rapid continuous auditing and monitoring (RCAM) can help. Supervisors assess organizational risk on a consistent, ongoing basis to determine whether the required procedures and rules are being followed. Recognize that supervisors are always pressed for time. In regulated fleets, supervisors fear an auditing process as it may uncover their deficiencies, as well as expose the company to citations and fines from a regulatory body such as FMCSA. Add to this the fact that, by nature of their role, fleet supervisors oversee personnel who they rarely interact with and it becomes clear why the untrained driver supervisor might fear the auditing process. Safety departments can help by doing the following:

- 1) Educate driver supervisors on all company mandates required by written policies and procedures.
- 2) Ensure that the supervisor understands the discipline process outlined in company policy.
- 3) Train driver supervisors in DOT/FMCSA regulations that affect their staff and department.
- 4) Provide the supervisor with basic background on any safety issue that they may not fully comprehend.

The Supervisor's Job

Supervisors have a mission to ensure that work is completed safely and efficiently. This requires them to be a mentor, coach, facilitator and motivator, among other roles, because a first-line supervisor is the key. Any good supervisor knows that employees will complete required tasks out of desire to be rewarded for doing the right thing, or out of fear of being punished for not toeing the line. Implementing both successfully may be difficult; this is where success lies.

RCAM should be performed each day with focus on an array of driver performance. It is important that supervisors use different techniques to conduct audits and monitoring, as the surprise factor adds an important element to promote compliance to the desired performance.

Take seat belt use as an example. A company has a specific requirement that drivers wear a seat belt, as required by law. During vehicle selection, the company used ANSI/ASSE Z15.1 section 6.1, Vehicle Acquisition, and determined that vehicles will be equipped with orange visible safety belts. Section 7.2.1 of the standard requires the employer to "analyze the casual and contributing factors" that influence the outcome or severity. Lack of belt use can contribute to increased injury to the driver. Auditing these two standards, one prior to and one after an incident, does not affect the outcome of a particular incident; however, it can affect future incidents.

The supervisor must make an impact now, and ensure that the seat belt is worn as often as practical to help reduce injury severity. How can s/he do this, knowing that his/her primary interaction with a driver may take place inside of a driver room?

Technology can assist if the vehicle is fitted with sensors or cameras. The supervisor can audit these sources to determine compliance. The supervisor can also make special efforts in monitoring driver behavior in the most likely place that driver behavior will occur: in the driving environment.

For seat belt enforcement, imagine that the supervisor positions him/herself at the gate both on departure and return of vehicles. S/he can choose to do this either in a stealth mode or an obvious inspection mode. Either choice has benefits:

- If the supervisor stands at the gate wearing an orange vest and holding a clipboard, making it obvious that s/he is checking for some sort of violation, s/he may catch a few unsuspecting violators. However, his/her presence may warn these violators and they will comply, similar to drivers slowing down when they see the red lights of a police squad car.

- These drivers have reinforced prior training that seat belts are important enough for their manager to stand outside (perhaps in cold, heat, snow, rain) to check on them.

- If the supervisor surreptitiously conducts the audit and surprises nonconforming drivers, this is an opportunity to send the same message, and continually keep drivers guessing as to the location and timing of enforcement, similar to a radar speed trap that surprises drivers as they crest a hill or pass their hidden location.

Both of these situations provide general and specific deterrence, a useful tool in getting compliance and reducing the need to monitor more often than time permits.

Specific deterrence is achieved from either talking to or disciplining a specific driver through RCAM. Clearly explain to the driver the nature of the infraction, the correct method and potential consequences for further infractions. Instill awareness that the supervisor will continue in the effort.

General deterrence occurs when that specific driver informs others that the supervisor is hiding out at the front gate checking for seat belt violations. Others will change their behaviors based on what they inferred from the specific driver.

The supervisor benefits from both. FMCSA (2013) outlines six processes of the safety management cycle, the last of which is meaningful action. One can infer meaningful action to include:

- discipline;
- retraining;
- reassignment;
- job loss.

When deficiencies are discovered, quick meaningful action by the supervisor has been shown to reduce recurrence in both the individual and the group as a whole.

The main reason RCAM works is because of the instant feedback and correction. Feedback should be consistent and consistently applied. RCAM should also be used with other unsafe behaviors associated with workers' compensation injuries unique to fleet operations, such as using lift gates to climb in and out of a truck and pulling fifth wheel pins.

Fleets that use any telematics, especially those that record unsafe driving indicators, should be monitored by the supervisor at least weekly to determine trends and take action accordingly. A high number of hard-braking events is a great example of a leading indicator as it may indicate aggressive driving that can translate into incidents. Individual feedback on telematics information, especially when it can be compared to the fleet as a whole, is best used when the information is fresh. Using RCAM will increase the return on investment for those devices.

It is important for companies to have necessary fleet policies that cover a variety of behavior. Hammer, Hinderks, Pratt, et al. (2015), provide a good outline of required policies.

Conclusion

This article discusses benefits of conducting a fleet audit and reviews key elements of a robust fleet audit process, including audit scope, methods, how to use the findings and rapid continuous audit monitoring of procedures. Fleet audits help identify strengths, weaknesses and/or gaps in program management or compliance.

Audit formats should be customized based on type of fleet being evaluated and audit scope. ANSI/ASSE Z15.1 should be used to help develop the audit guide and to validate that the audit measures the fleet operations to best practices.

Take action to evaluate fleet on-road performance, safety management process and controls. Use audit findings to drive excellence in fleet safety system management by preparing action plans and meaningful strategies to address gaps that impact total fleet risk and associated costs. **PS**

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