GUIDANCE DOCUMENT:

FITNESS TO DRIVE FOR GREY FLEET DRIVERS

Driving is a complex task with many psychosocial and physical demands. Fitness to drive is influenced by a range of driver-related conditions and environmental demands. This guide presents some research on drivers' fitness to drive under time pressure, and includes some guidance on how to manage safety concerns.

What is psychological health within Australian legislation?

"health means physical and psychological health"

"health includes psychological health2"

What is a psychosocial hazard?

A psychosocial hazard occurs when i:) a hazard arises from the design or management of work, the work environment, the workplace plant, or workplace interactions or behaviour; and ii) may cause psychological harm (i.e., harm someone's mental health¹¹). All psychosocial hazards and risks must be managed as per duties of a person conducting a business or undertaking (PCBU) within the worker jurisdiction3. Psychological harm may manifest in the form of anxiety, depression, and post-traumatic stress disorder3.

Model Work Health and Safety Act (Part 39, Provision of information, training and instruction)

- (1) This clause applies for the purposes of section 19 of the Act to a person conducting a business or undertaking
- (2) The person must ensure that information, training and instruction provided to a worker is suitable and adequate having regard to: (a) the nature of the work carried out by the worker; and (b) the nature of the risks

associated with the work at the time the information, training or instruction is provided; and (c) the control measures implemented.

(3) The person must ensure, so far as is reasonably practicable, that the information, training and instruction provided under this regulation is provided in a way that is readily understandable by any person to whom it is provided."

Assessing Grey Fleet Driving as a **Potential Hazard**

Temporal Urgency - psychological pressure from a sense of lack of time - has been studied in the context of human error around both decision making and cognitive function:

Decision making errors: Under time pressure, reduced information acquisition leads to diminished accuracy in decision making. Applying this concept to driver behaviour, a shorter time constraint will yield more driving errors.

Cognitive function decline: A time urgency creates stress which contributes to further driver behaviour errors. In a temporal urgency situation (i.e., time pressure), a driver's movements and responses can occur before adequate cognitive processing (such as information acquisition). Essentially, this means that under time pressure, drivers may act before they adequately think about their surroundings4.







GUIDANCE DOCUMENT: FITNESS TO DRIVE FOR GREY FLEET DRIVERS

Time Pressure Research

Time pressure can lead to risky driving behaviour.

Under time pressure, drivers have been shown to driver faster and reduce their adherence to following traffic rules⁵. Time pressure may decrease reaction time in drivers, and this has been demonstrated during situations of pedestrian crossing and overtaking obstacles⁶. Specifically, for each 1m/second increase in approach speed, reaction time decreases by margins of 2% (for a pedestrian crossing) to 4% (for overtaking obstacles)⁶. Drivers who regularly exercised and had sufficient sleep reacted quicker in response to these scenarios, i.e., 16% faster for reacting to pedestrians crossing, and 17% faster for obstacle overtaking⁶.

Time pressure significantly influences a driver's ability to control their vehicle. For example, under time pressure, the steering of a driver may be affected by faster reactions⁶. In these situations, drivers under time pressure drive differently (than normal) as they balance their risky driving manoeuvres with the anxiety of having a crash; partly as a result of having inadequate steering control, and having less time to make decisions⁶.

Furthermore, drivers under time pressure must be more alert (mentally and visually) to compensate for the risk taking, due to the increased threat vigilance from trying to avoid a crash, whilst simultaneously driving through traffic to meet their time goal? Not surprisingly, these increased levels of sustained alertness may lead to mental fatigue. In a study of work pressure within work-related driving, time pressure had the strongest affect upon mental fatigue. In a perpetual spiral of risk, time pressure leading to fatigue can further increase risky driving.





GUIDANCE DOCUMENT: FITNESS TO DRIVE FOR GREY FLEET DRIVERS

Driving Time is Work Time

Research has found that schedulers often underestimate driving time within journey planning, with extraneous factors, such as weather conditions, often not properly taken into consideration8. Workers may prioritise client outcomes or meeting the needs of the customer, and this may supersede the worker's own safety needs (and that of other road users); for example, acting on time pressure to drive faster to spend more time with their client or arrive earlier to meet a deadline8. Research has found that time constraints do not need to be overtly present for drivers to experience time pressure9.

Time pressure is influenced by time constraints, time uncertainty, and goal importance9. Many work-related drivers are influenced by the societal pressure of a

'clock time culture' which advocates that time cannot be 'wasted'9. Time pressure is a mismatch between available time and required time. Additionally, many work-related drivers are under the impression that time spent behind the wheel is not productive time9. Research has found that time pressure increases worker burnout in professional drivers, and contributes to poorer health and wellbeing outcomes10.

This research suggests that it is important that managers communicate to drivers that driving time is work time that must be completed safely.

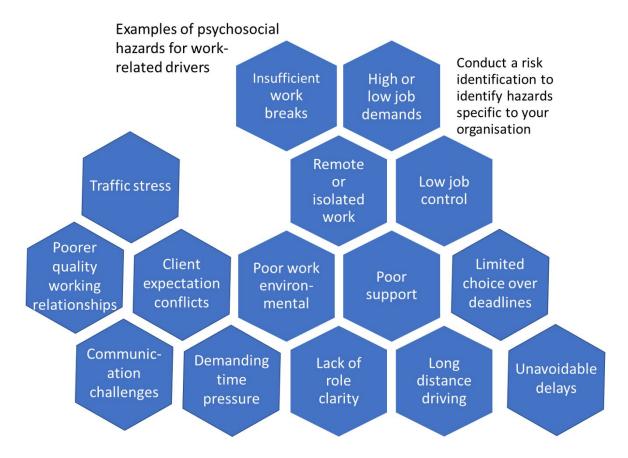


Figure 1. Examples of psychological hazards with the workplace (Safe Work Australia, n.d; WorkSafe QLD, 2019.) Note: this list is not exhaustive.



GUIDANCE DOCUMENT:

FITNESS TO DRIVE FOR GREY FLEET DRIVERS

Maintaining Psychological Health for PCBUs

Identify hazards

"Psychosocial hazards can cause stress. Stress is the body's reaction when a worker perceives the demands of their work exceed their ability or resources to cope³."

"Stress itself is not an injury but if it becomes frequent, prolonged or severe, it can cause psychological and physical harm³."

Consult with workers

In consultation, co-operation, and coordination with other duty holders, a person conducting a business or undertaking (PCBU) must consult with their workers, so far as is reasonably practicable, on matters relating to work health or safety¹¹. Workers should be given reasonable opportunity to express their views and raise work-related health or safety issues, and contribute to decision making in these matters¹¹.

Some examples of when consultation is required include (list not exhaustive): identifying hazards and assessing risks; decision making on eliminating (as a priority) or minimising risks; and advising on proposed work changes that may affect health or safety¹¹. A PCBU must consult with workers about reducing the likelihood of acquiring work-related injuries and illnesses¹¹. This legislated requirement incorporates the concept that workers may have their own suggestions or solutions to address workplace hazards, such as psychological harm¹¹.

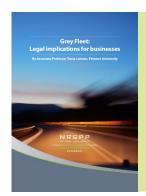
All workers must be provided with reasonable opportunities to raise and express psychological concerns, and contribute to decision making around managing their health¹¹.

Educate and train workers

A PCBU must ensure, as dar as is reasonably practicable, "the provision of any information, training, instruction or supervision that is necessary to protect all persons from risks to their health and safety arising from work carried out as part of the conduct of the business or undertaking"¹¹. Furthermore, workers must also be monitored for preventative health and safety purposes¹¹.

Provide information, training, education, instruction, and supervision as needed to effectively manage workers' psychological health. As required by law, employers must effectively control the work that their workers (and volunteers) perform, and simply telling a worker a procedure and asking them to acknowledge understanding of this task, is not sufficient under WHS Regulation 39¹³. Workers must be trained as needed for them to safely complete a work task. Unsatisfactory work performance or poor workplace behaviour may arise from psychosocial hazards within the workplace, such as time pressure, as discussed previously.

For more information on additional workplace responsibilities for work health and safety, seek advice from Safe Work Australia, the state regulator, or a qualified legal professional.



Duty of care by employers extends to maintaining safe system of work. Grey fleet vehicles used as part of a system of work, must be used as a safe system¹³. This includes allowing adequate time for grey fleet drivers to move between work destinations¹³. Check out this NRSPP resource for more information on legal implications for grey fleet.



GUIDANCE DOCUMENT: FITNESS TO DRIVE FOR GREY FLEET DRIVERS

Hierarchy of Controls in Safety Management

Figure 2 Hierarchy of Controls as inspired by National Institute for Occupational Safety and Health¹².

Eliminate

Substitute

Substitute an unsupportive work environment with health and wellbeing policies and programs that enhance workplace

Eliminate working conditions that threaten physical and psychological safety, such as via visible person-focused leadership and improving supervision throughout the workplace

Redesign

Redesign the work environment to enhance physical and psychological safety, such as allowing flexible schedules

Educate

Educate workers on how to individually identify and manage physical and psychological hazards in the workplace

Encourage

Encourage personal change such as positive worker behaviour, and promotion of civility

Below are several strategies that leaders and managers may use to help eliminate and minimise threats to worker health, safety, and wellbeing, including psychological health¹²:

Top level managers:

- Openly support and participate in workplace health and safety initiatives
- Facilitate participation across all levels of the workforce
- Add health and safety standards into performance evaluations
- Build health and safety into the organisational mission and objectives
- Emphasise that shortcuts must not compromise worker health and safety
- Provide adequate resources, including appropriate levels of training

Direct managers:

- Encourage worker feedback and reporting on work conditions (such as health and safety concerns), and work collaboratively to create positive change
- Encourage and reward workers who take initiative to create safer work systems, reduce work stress, or improve quality of work life
- Emphasise that short cuts (such as speeding in response to time pressure) must not occur and there are no compromises on worker health and safety

25.2% of serious mental stress claims (2021 – 2022) were due to work pressure 13

"Under model work health and safety laws, psychosocial hazards and risks are treated the same as physical hazards and risks¹³."





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