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Labour  
Organization

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FOR ALL

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ZERO  
FUND

# COLLECTIVE ACTION FOR A SAFE COMMUTE

Action manual and checklist  
for employers and workers in the  
garment and footwear sector to  
enhance workers' commuting safety



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# Glossary

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**Collective action:** A multi-stakeholder approach that involves governments, workers and trade unions, national, transnational and global employers and their organizations, multilateral organizations, civil society and development agencies, working together so that each meets its responsibilities, consistent with organizational roles, to implement an agreed plan or set of actions to reduce severe or fatal work accidents, injuries or diseases in supply chains.

**Collective transport:** Transport available to a group of people against payment (that can be covered by someone other than the passenger), carried out regularly at specific intervals and driving specific and predetermined routes. Collective transport vehicles are vehicles used for those purposes that can carry at least four passengers but usually have larger passenger capacity.

**Commuting accident:** An accident resulting in death or personal injury occurring on the direct way between the place of work and (i) the worker's principal or secondary residence; or (ii) the place where the worker usually takes a meal; or (iii) the place where the worker usually receives his or her remuneration.

**Competent authority:** A ministry, government department or other public authority with the power to issue regulations, orders or other instructions and enforce them.

**Mixed traffic conditions:** An environment in which various categories of vehicles and pedestrians share the roads without any physical segregation between motorized and non-motorized vehicles and pedestrians and without proper lane discipline.

**Occupational accident:** An occurrence arising out of or in the course of work which results in fatal or non-fatal injury.

**Occupational safety and health committee:** A bipartite committee with representation of workers' safety and health representatives and employers' representatives established at the workplace and assigned to various functions intended to ensure cooperation between the employer and workers and achieve and maintain safe and healthy working conditions and environment, according to national laws, regulations and practice.

**Risk:** A combination of the likelihood of an occurrence of a hazardous event and the severity of injury or damage to the health of people caused by this event.

**Traffic accident "hotspot":** Location (e.g., road, intersection) where road traffic crashes frequently occur (sometimes also called "black spots").

**Traffic crash:** A collision or incident involving at least one road vehicle in motion, on a public road or private road to which the public has right of access. While the focus of this manual is on "commuting accidents", the terms "traffic accident" and "traffic crash" are used interchangeably and without distinction.

**Vulnerable road user:** A term applied to those most at risk in traffic, referring to pedestrians, pedal cyclists, motorcyclists and other road users who lack an external shield that could absorb the impact of a road crash and who are therefore prone to injury in any vehicular collision.

**Worker representative:** Any person who is recognized as such by national law or practice, whether they are: a) trade union representatives, namely representatives designated or elected by trade unions or by members of such unions; or b) elected representatives, namely representatives who are freely elected by the workers of the enterprise in accordance with provisions of national laws or regulations or of collective agreements, and whose functions do not include activities which are recognized as the exclusive prerogative of trade unions in the country concerned.

FACTORY

SUGGESTIONS

FACTORY





**ENTRANCE**

**STOP**

**STOP**

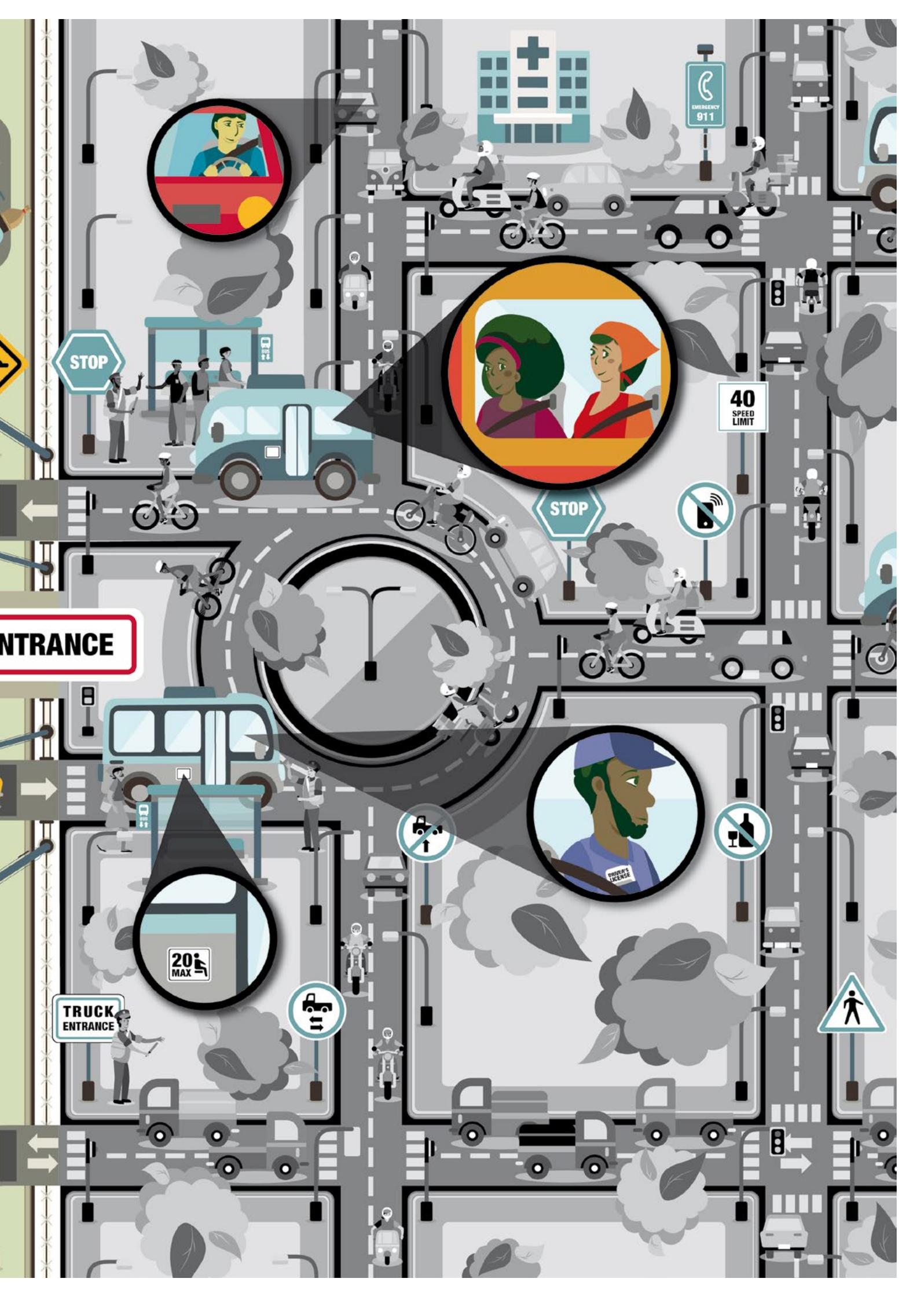
**40  
SPEED  
LIMIT**

**TRUCK  
ENTRANCE**

**20  
MAX**

**PROPERTY  
LICENSE**

**EMERGENCY  
911**



# Introduction

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## Why an action manual and checklist to improve commuting safety

Commuters, as road users, are at high risk of being involved in traffic crashes and commuting accidents. A commuting accident is defined as an accident resulting in death or personal injury occurring on the direct way between the place of work and:

- (i) the worker's principal or secondary residence; or
- (ii) the place where the worker usually takes a meal; or
- (iii) the place where the worker usually receives his or her remuneration. Some 93 per cent of the world's traffic fatalities occur in low- and middle-income countries, which is where most of the world's garment and footwear factories are located.<sup>1</sup>

While the exact number of commuters killed or injured in traffic accidents is not known, the International Labour Organization (ILO) estimates that 211,000 workers die annually, and, as a result of nonfatal occupational road injuries, a total of 13.3 million healthy life years (i.e., total number of years that victims would otherwise have spent in health) are lost each year.<sup>1</sup> In addition to the grave, long-term impact on workers' lives, injuries resulting from commuting accidents also cause considerable economic loss to individuals, their families, employers, and, together with other road traffic injuries, to countries as a whole. These losses arise from the cost of medical treatment, lost productivity for those killed or who are disabled by their injuries, and the impact on family members who take time off work or school to care for the injured. In total, road traffic crashes cost most countries 3% of their gross domestic product.

**Improving commuting safety in the garment sector requires the implementation of a collective action approach.**<sup>2</sup> Isolated efforts by the government, employers or workers alone cannot address problem. All major

### Road traffic injuries

Nearly

**1.3** million  
**DEATHS**

and as many as

**50** million  
**INJURIES**  
each year

Source: WHO (2022).

<sup>1</sup> ILO P155 - Protocol of 2002 to the Occupational Safety and Health Convention, 1981.

<sup>2</sup> ILO, 2023.

stakeholders need to work together, consistent with their respective mandates, to collectively address the systemic issues that lie at the root of commuting accidents.

## What do ILO standards and instruments say about commuting safety?

The ILO's normative instruments consider commuting safety an aspect of Occupational Safety and Health (OSH). [Protocol 155 of 2002 \(to Occupational Safety and Health Convention, 1981 \(No. 155\)\)](#) defines commuting accidents and places them on par with other occupational accidents, occupational diseases and dangerous occurrences in systems for recording and notification. It also clarifies the employers' responsibility regarding the recording and notification of such accidents.

The [ILO Code of Practice \(CoP\) for safety and health in textiles, clothing, leather and footwear \(2022\)](#), discussed and adopted by a tripartite meeting of experts, outlines the general obligations, responsibilities, duties and rights of governments, employers' and workers' organizations as well as other stakeholders regarding the safety and health of workers in these sectors. The CoP indicates that commuting times should be considered in risk assessment and the fatigue management plan, thereby recognizing that commuting may affect work performance, as appropriate.

This manual is designed to promote collective action between employers, workers and other stakeholders (such as government, brands, buyers, designers, manufacturers, suppliers and workers' and employers' organizations) to address commuting risks faced by workers. It provides users with practical, easy-to-implement checklists to identify commuting risks and prioritize action points to address these risks.

Figure 1 shows four areas of risks affecting workers' commuting safety (on the left) and the corresponding four areas of desired change (on the right) that are expected to reduce commuting accidents. Since this manual is to be implemented at the workplace, it focuses on actions related to the first two areas but also discusses how all stakeholders can contribute to the other areas of change.

**Figure 1.** The different areas of risk that may affect workers' commute (in blue) and the corresponding desired changes (in red)

**FOUR AREAS OF RISK**  
affecting commuting  
safety



## What makes this manual participatory and action-oriented?

This manual proposes a participatory approach for assessing commuting practices and behaviours, and designing actions to improve commuting safety. It draws inspiration from the ILO's Participatory, Action-Oriented Training (PAOT) approach, a practical method used for stimulating and supporting workplace initiatives, helping people use local knowledge and resources to analyze the problem and develop creative and practical solutions to improve OSH.

The practical advice provided in this manual will primarily benefit factories and workers. To effectively apply this tool, both employer and worker participation and input is necessary. Through discussion and collaboration, participants will identify the best possible solutions to known safety issues.



Garment workers, Cambodia, ILO 2023

## Key principles of the PAOT methodology

The PAOT methodology is based on the following six principles:

- Build on local practice;
- Use learning-by-doing;
- Encourage exchange of experience;
- Link working conditions with other management goals;
- Focus on achievements;
- Promote workers' involvement.

Source: ILO (2020) Participatory Action-Oriented Training (PAOT).

## How can this manual be used?

### 1. Implementing this manual

This manual includes eight checklists that you can use to identify issues affecting the safety of commuters in a given workplace.

Each checklist consists of questions or statements for assessing commuting safety in eight areas. You are encouraged to add additional questions if needed to better capture aspects of commuting safety relevant to their context and circumstance.

To formulate action plans that are relevant, realistic, and financially viable for improving commuting safety, it is crucial for this manual to be collaboratively implemented by both workers and employers.

If there is already an existing Occupational Safety and Health (OSH) committee in the factory, it can be assigned the responsibility of implementing this manual. However, if no OSH committee is in place, a Commuting Safety Working Group can be established specifically for this purpose.<sup>3-4</sup>

<sup>3</sup> If an OSH committee does not yet exist, users of this manual should consider creating one following guidance provided in the Occupational Safety and Health Recommendation, 1981 (No. 164).

<sup>4</sup> For more information about OSH Committees visit: [https://www.ilo.org/static/english/osh/en/story\\_content/external\\_files/fs\\_bs\\_2-workplace\\_4\\_en.pdf](https://www.ilo.org/static/english/osh/en/story_content/external_files/fs_bs_2-workplace_4_en.pdf)

For the sake of clarity and consistency, the group of workers and employers implementing the manual will be referred to as “the committee” throughout this document. The composition and size of the committee may vary between factories. Ideally, it should include 12-14 members, but smaller or larger committees can also be effective. It is important to ensure a balanced representation of various worker groups and key management positions within the committee.

Each committee or working group member is advised to read the entire manual before commencing to ensure a comprehensive understanding of the research process.

Checklists are intended for use within the workplace, specifically on the factory premises. They involve observing workers during their arrival and departure, assessing visible safety behaviors like helmet use, and evaluating the safety of the transportation utilized. Certain aspects may necessitate Focus Group Discussions with workers (further details on Focus Group Discussion methods can be found below). The checklists serve to streamline problem analysis and guide actions aimed at addressing identified risks and issues.

An initial mapping of modes of transport used by commuters may be helpful to answer some of the questions contained in the checklists. A tool (template) for such a mapping has been included in Annex B.

The committee can opt for organizing itself into thematic subgroups, distributing the checklists among these subgroups for more efficient data collection and analysis. Each subgroup should begin by reviewing their checklist content, devising a plan for its implementation, considering the required information for addressing checkpoints, and identifying suitable collection methods.

Alternatively, checklists can be applied sequentially, over a longer period of time (spread across multiple OSH committee meetings). In such a case, it is useful to designate a member responsible for planning, preparing, and facilitating the information collection process.

## **2. Organizing technical sessions and group discussions for prioritizing actions**

Following checklist implementation, the committee will convene to discuss findings. This can be done first within each subgroup, with members analyzing assessment results, discussing existing good practices and areas for improvement. Emphasis should be placed on prioritizing actions for improvement, identifying three crucial actions utilizing local resources and employer support.

### 3. Sharing insights and action plans between groups

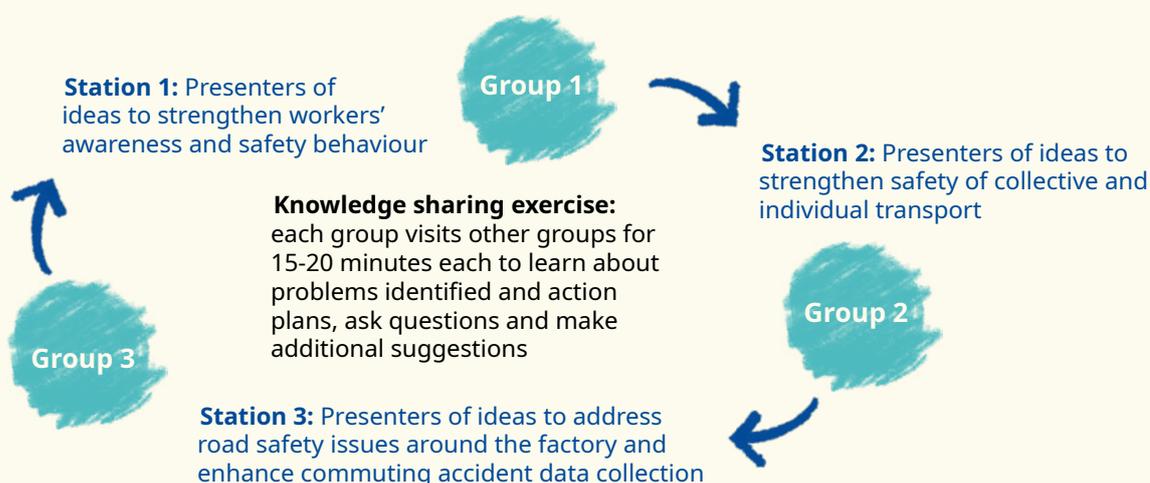
Once every subgroup has identified priority action areas and drawn up their action plans, it is important to share these insights and action plans with the broader committee. One way of doing this is through a knowledge sharing exercise, in which one or two members act as presenters (Figure 2), while other members of the group attend the other group's presentations to learn about problems and suggested action plans, pose questions, and make additional suggestions.

### 4. Developing improvement proposals and present them to management representatives for implementation

To improve commuting safety, participants in each group develop proposals to design the action plan using either their own template or the one in Annex B. Information included in the technical chapters of this manual can help to develop the proposals.

The committee may not have the resources needed to implement the proposals. The development of proposals should therefore be done with factory management representatives (e.g., the Factory Manager, Human Resources Manager, OSH Officer, on-site Doctor, etc, as relevant), and/or be concluded with a presentation to management. This will ensure that the proposals are realistic and financially viable.

**Figure 2.** A knowledge sharing exercise



## 5. Planning follow-up activities

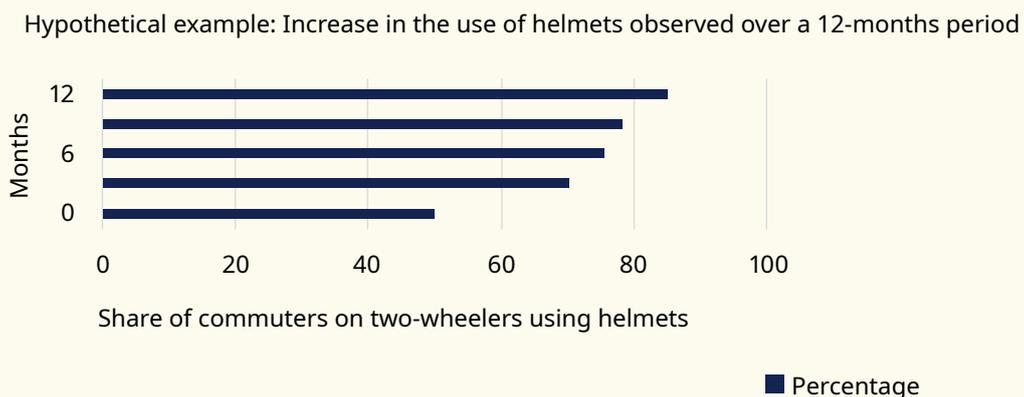
Follow-up activities should be conducted every three to six months to assess whether change is occurring as expected. Positive results and lessons learned should be regularly communicated within the factory to show that change is possible, that injuries can be prevented, and to encourage continued safety efforts.

If limited progress has been made, the committee will need to identify the obstacles to change, and how they can be overcome. The process of analyzing and addressing commuters' safety risks is continuous. The issues will not be resolved at the first attempt, and various rounds of attempts may be needed to ensure significant and lasting change.

### How can improved commuting safety be measured?

Achieving improved safety is assessed by tracking and comparing the value of key indicators: the initial value is called the "baseline value" (at 0 Months in Figure 3). Follow-up measure points should be conducted at regular intervals; every three months, or maybe twice a year (at six months, and after one year of implementation), depending on how quickly change is expected to happen or become observable. The resources of the committee might also impact how often indicators are measured and analysed.

**Figure 3.** Example of regular follow-up of a key indicator.



### Suggested key indicators

The suggested indicators to monitor changes in commuting safety are based on the safety recommendations included in this guide.

- Number of commuting accidents reported/recorded and notified per factory and year (disaggregated type of commuting vehicle/gender and age of commuter/type of injury/length of rehabilitation period)
- Number of commuters injured in a commuting accident with insurance that covers care and rehabilitation (disaggregated gender/age/only immediate hospital care/both care and rehabilitation)
- Percentage of commuters on two- or three wheelers using helmets (gender/age/colour of helmet/proper use or not)
- Percentage of commuters using collective (public/private) transport who are seated/with seatbelts (gender/age)
- Percentage of commuters using collective (public/private) transport who believes that the collective vehicle driver is driving safely (disaggregated gender/age)
- Percentage of commuters using collective (public/private) transport who generally feel safe during the commute (disaggregated gender/age/public/private transport)
- Percentage of workers with insurance that covers the commute (disaggregated gender/age).

Additional indicators can be added to make sure that priority areas of change can be monitored by the committee and results reported back to workers and employers.

## Attitudes

Percentage of commuters that agree with the following statements:

- It is acceptable to not wear a helmet for short distances
- It is acceptable to exceed the speed limit within 10 km/h

# Action checklists for a safe commute

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## How to use the checklists

- Read each paragraph carefully, consider ways to apply the measure and, among yourselves, discuss the question “What, if any, action is needed?”
- Is no action needed? Check the “No” box.
- Is action needed? Check the “Yes” box. Make sure that you have ticked “Yes” or “No” for each paragraph.
- Use the “Comments” space to describe any action selected or challenges identified.
- For all paragraphs where you have answered “Yes”, discuss whether the “priority” box should be ticked or not.

### Safety Guidelines

To ensure their own safety, committee members should discuss potential safety hazards and identify ways to remain safe while conducting the assessment.

The following safety measures should always be observed during the assessment:

- wearing a hi-visibility safety vest
- walking in a single line against oncoming traffic
- wearing a helmet when traveling by motorcycle (driver and passenger)

## Situation Analysis

The situation analysis involves establishing the baseline for measuring the indicators presented above. Additional indicators can be added to reflect changes in priority areas, as necessary.

In addition, consider collecting the following background information:

- The number of workers (commuters) at the factory;
- The mode of transport workers use to travel to and from work;

- The approximate share of workers who commute using collective transport vehicles provided and paid for by the employer;
- The peak hours arrival and departure from the workplace.

Remember that “commuting” involves all ways in which a worker transports her or himself the direct way between the place of work and (i) the worker’s residence; or (ii) the place where the worker usually takes a meal; or (iii) the place where the worker usually receives his or her remuneration.

Reporting of commuting accidents often focuses on employer-provided transport, disregarding incidents happening on other means of transport. When committee members assess the safety of commuting practices, all manners of commuting should be considered, including e.g., walking to the pick-up point or using public transport.

### Suggested methods

The following methods are suggested to collect information needed for the checklists:

**Observation:** Information about observable behaviour, such as the use of helmets and whether buses have seats for all passengers, can be measured by committee members positioned at the factory gate (or at another location that provides a good view of traffic) as commuters arrive for their shifts. The exercise can be conducted a few days in a row to enhance the reliability of the results.

**Survey:** Questions about safety attitudes and behaviour that cannot be observed at the gate, such as commuting drivers adherence to speed and other traffic regulations (including stop signs etc), their use of mobile phones while driving, and whether they drive while under the influence of alcohol or drugs, can be assessed through an anonymous survey among a sample of workers.

The sample size will depend on the size of the workforce. If possible, a minimum of **10 per cent of all workers** should complete the survey to make it representative.<sup>5</sup>

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<sup>5</sup> In large factories, a smaller sample of at least 100 respondents will give committee members a useful overview of the situation. While a sample of 100 workers is the minimum for a useful survey, a sample larger than 1,000 will not provide you with additional information.

Questions from other checklists can be added as relevant. It can be helpful to look through all the checklists when designing the survey. Questions that could be included in a survey are marked in the checklists below.

**Focus Group Discussions (FGDs):** For more in-depth information on safety perceptions, opinions and experiences of commuters, it is suggested that the OSH committee organize FGDs. These are interviews with groups of 6 to 12 participants. Approximately ten open-ended questions are put to the groups to gather information. Focus groups should consist of members that are perceived to be as similar as is possible (in terms of gender, age, ethnicity, work position, mode of transport for commuter purposes or other aspects that are considered relevant), to encourage active participation by all participants.



Garment workers, Vietnam, ILO 2023

# 1. Individual risk awareness and commuters' safety behaviour

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## The basics

- Global road safety initiatives highlight five types of behaviours that are known to affect road safety and thereby commuting safety<sup>6</sup>:

### 1. Helmets save lives

Wearing a helmet is the single most effective way of reducing head injuries and fatalities resulting from motorcycle and bicycle crashes. Correct helmet use can lead to a 42 per cent reduction in the risk of fatal injuries and a 69 per cent reduction in the risk of head injuries. Both drivers and passengers should wear a helmet. For adequate protection, the helmet must fit closely and be securely attached. Any helmet that has sustained a violent impact should be replaced.

### 2. Seatbelts save lives

Wearing a seatbelt reduces the risk of death among drivers and front seat occupants by 45 to 50 per cent, and the risk of death and serious injuries among rear seat occupants by 25 per cent.

Seatbelts, if available or installed in employer-provided commuting services, enhance the safety of commuters if the vehicle is involved in a traffic crash by:

- Reducing the risk that the commuter crashes into the interior of the vehicle, or reducing the severity of injuries if this occurs;
- Preventing the commuter from being ejected from the vehicle in a traffic crash;
- Preventing injury to other occupants (e.g. in a crash, unbelted passengers can be catapulted out of their seat and hit other occupants).

### 3. Speeding kills

An increase in average speed is directly related both to the likelihood of a crash occurring and to the severity of the consequences of the crash. Speeding involves

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<sup>6</sup> See e.g., WHO (2022) [Fact sheet on road traffic injuries and risk factors](#). In addition to behavioural risk factors, road infrastructure, unsafe vehicles, inadequate post-crash care and inadequate enforcement of traffic laws are recognized as factors that increase the risk of road traffic injuries.

both driving above the speed limit and driving at an inappropriate speed (driving too fast for the conditions), which relates to the driver, vehicle, road and traffic mix rather than just to the speed limit.

#### 4. Driving under the influence of alcohol and/or drugs kills

Driving under the influence of alcohol and/or drugs (including the use of certain medicines) increases the risk of a crash that results in death or serious injuries.

Globally, drink-driving is identified as a key factor in 27 percent of all road injuries. Even at low blood-alcohol levels, drivers experience problems with concentration, coordination and identification of risks in the road environment. In addition, drink-driving crashes can be more severe or more common on roads characterized by poor design and/or poor maintenance.

#### 5. Distracted driving increases the risk of a crash

Drivers using mobile phones while driving are approximately four times more likely to be involved in a crash than drivers not using a mobile phone. Using a phone while driving slows reaction times, notably braking reaction time, but also reaction to traffic signals, and makes it difficult to stay in the correct lane and to maintain the appropriate following distances.

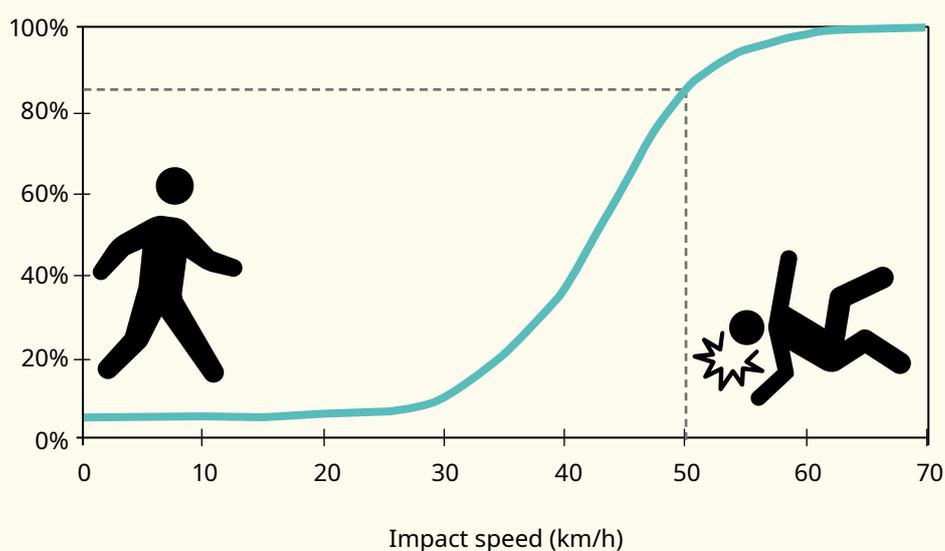
**Commuters should be aware of these risk factors and be encouraged to behave in a way that enhances their commuting safety.** Data presented here can be used in awareness campaigns directed at commuters. In addition to their own behaviour, commuters should be encouraged to consider the behaviour of others as risk factors that may affect the safety of their own commute, and be empowered to assess and, if possible, address the risks encountered along the commuting route.

Committee members should consider how these risk factors affect commuting safety. Specifically, they should consider how they can address not only the behaviour of commuters but also the behaviour of other road users who contribute or pose a challenge to the safety of workers' commute. **Commuters are often particularly vulnerable when walking, cycling, riding mopeds/motos or motorcycles, both as drivers and as passengers.** If a motor vehicle collides with a pedestrian, cyclist, moped rider and/or motorcyclist, there is a high risk of severe or fatal injury. The probability that a pedestrian will be killed if hit by a motor vehicle increases dramatically with speed. Factories are often places close to highways, and workers sometimes are dropped off on them, having to walk the final distance to the factory, which represents a **potential high-risk commute situation** that should be considered by the committee. For instance, can something be done to lower the speed of other road users or to separate pedestrians from vehicles on highways?

The safety of commuters working in industrial zones or parks is affected by the speed limits set within the park. Assessment on the awareness of these risks is included in this chapter, while assessment of the actual risks surrounding factories can be done with the checklist included as part of chapter 3.

Figure 4<sup>7</sup> shows the probability of a fatal injury for a pedestrian colliding with a vehicle. **Research indicates that while most vulnerable (unprotected) road users survive if hit by a car travelling at 30 km/h or less, the majority are killed if hit by a car travelling at 50 km/h.** Speed limits in industrial parks and factory premises should take this into account. Speed limits on factory premises can be set at 5 km/h, with a maximum of 30 km/h in industrial parks. Speed limits should be well advertised.

**Figure 4.** Probability of fatal injury for a pedestrian colliding with a vehicle



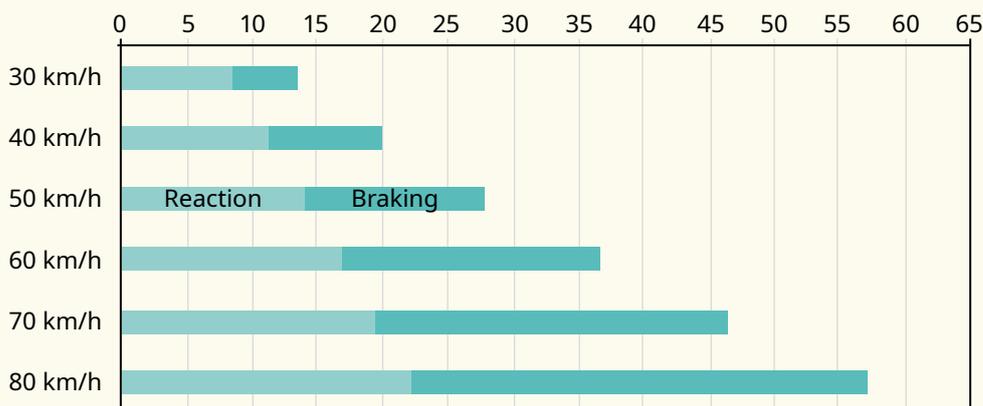
Workers who commute to and from work on two- or three-wheelers are at high risk of being injured while commuting. Globally, nearly 30 per cent of all road crash deaths involve powered two- and three-wheeled vehicles, such as motorcycles, mopeds, and scooters. **Key risk factors for motorcycle traffic injuries include the risk factors mentioned above, such as drivers and passengers not wearing helmets, speeding, and alcohol use.** Commuters should also be made aware of the need

<sup>7</sup> From Global Road Safety Partnership (2008) [Speed management: a road safety manual for decision-makers and practitioners](#). (p.5)

to be particularly cautious in mixed traffic conditions, and to be attentive to poor road surfaces and other roadside hazards.

Figure 5 shows how the stopping distance in an emergency braking situation increases with speed. Both the distance travelled, while the driver reacts to an incident on the road, and the distance travelled before the vehicle is brought to a stop, increase significantly with speed. Commuters should be aware of speed and its impact. These figures can be used by the committee to advocate for lower speed limits around commuters in vulnerable traffic situations, to encourage commuters to drive at the appropriate speed, and collective transport drivers to abide by speed limits.

**Figure 5.** The stopping distance increases with speed



Source: Global Road Safety Partnership (2008) [Speed management: a road safety manual for decision-makers and practitioners](#). (p.35)

## Awareness campaigns

Awareness, knowledge and attitudes towards road safety can be affected by campaigns and education initiatives. The poster below is the English version of a poster used during an awareness campaign in Cambodia. It encourages commuters to be “safe road users”, instructing them to use helmets, to obey the speed limit, to follow traffic rules, to avoid driving when drinking, and to not use mobile phones while driving.

It is important to consider where to place awareness posters for best effect. Posters can be placed at different spots inside factory buildings but are also often placed at motorcycle/bicycle parking spaces and at exit gates to remind workers to be safe road users when they leave the factory.

**THE GLOBAL GOALS**  
For Sustainable Development

**AIP FOUNDATION**  
SAFE ROADS FOR LIFE

**BetterFactories**  
Cambodia

# YOUR LIFE IS IN YOUR HANDS

## Be a safe road user!

**PROTECT YOUR HEAD AND LIFE**  
Always properly wear a quality helmet

**OBSERVE THE GIVE WAY RULES**

- Look both ways, right and left
- Obey Give Way, Stop signs, and traffic lights
- Give priority to those on the main road when entering from village roads

**DO NOT DRIVE**  
IN THE OPPOSITE DIRECTION FROM ONCOMING TRAFFIC

**OBEDIENCE THE SPEED LIMIT**  
បន្ថយល្បឿន SLOW DOWN

**In urban areas**  
the speed limit is **30km/h** for motorcycles.

**In rural areas**  
the speed limit is **60km/h** for motorcycles 125CC and under and **70km/h** for motorcycles over 125CC

**AVOID OVERTAKING**  
Only overtake other vehicles if necessary and safe to do so.

**NO MOBILE PHONE WHILE DRIVING**  
Focus on the road

**ONLY DRIVE SOBER**

**WHAT TO DO IF YOU HAVE OR SEE A PROBLEM**

- Promptly report all road crashes and any related injuries to police and seek medical treatment for any injuries
- At the factory promptly report crashes or near misses to supervisor and/or administration
- If you have a safety concern say something

## Behaviour change

Awareness can be raised through campaigns but changing people's behaviour is more difficult.

Committee members should consider how behavioural change can be encouraged. Can incentives to use a helmet, to adhere to the speed limit, and/or to follow traffic regulations be put in place by the factory?

Evidence from Cambodia indicates that factories can bring about behavioural change. For example, some factories implemented a policy that prevented drivers who drove two-wheelers without helmets from parking their motorcycles inside the factory premises. This contributed to an increased use of helmets among drivers. To function smoothly, however, such incentive systems need to be based on an agreement between workers and employers, and specific attention should be paid during early stages of implementation to ensure that there are no unintended consequences.





## Checklist 1

### Individual risk awareness and commuters' safety behaviour

Checklist 1 is divided into three parts as to highlight key awareness and safety behaviour aspects relevant to three different means of commuting, namely:

- i) Commuting by foot,
- ii) Commuting with employer-provided or public collective transport, and
- iii) Commuting with own vehicle (car or two/three-wheeler).

#### Suggested methods

**Observation:** Behaviour can often be studied through observation. The use of helmets and seat belts can be measured by committee members positioned at the factory gate, or at another location that provides a good view of traffic as commuters arrive for their shifts. The exercise can be conducted over a number of days to enhance the reliability of results. Behaviour in situations further away from the factory, e.g., pedestrian behaviour after getting off the bus on the way home, may be difficult to observe. Conducting focus group discussions or implementing a survey may be more practical tools to explore such behaviour.

**Survey or focus groups discussions:** Questions measuring safety awareness, knowledge and behaviour that are difficult to observe (for example, commuters' respect for speed limits and other traffic regulations, use of mobile phones while driving, and driving under the influence of alcohol or drugs) can be assessed through an anonymous survey. Questions from other checklists can be included in the survey as relevant (consult other checklists in which suggested survey questions are included). If conducting a survey is not possible, such questions can be explored through a series of focus group discussions to get indicative answers about commuters' awareness and behaviour. However, focus group discussions are likely to result in less precise measurements of awareness and behaviour, and may therefore not be suitable for baseline studies (against which to measure change).

### Part 1: Workers commuting by foot<sup>8</sup>

#### 1.1 Use the sidewalk and designated pedestrian crossings (when available).

Do you suggest any action?

- Yes
- No
- Priority

Comments:.....  
 .....  
 .....



#### 1.2 Are aware of the dangers of being distracted in traffic, look both ways when crossing the road and only cross the road when it safe to do so.

Do you suggest any action?

- Yes
- No
- Priority

Comments:.....  
 .....  
 .....



### Part 2: Workers commuting with employer-provided or public transport

#### 1.3 Understand the benefits of using a seatbelt and use it, when available.

Do you suggest any action?

- Yes
- No
- Priority

Comments:.....  
 .....  
 .....



<sup>8</sup> To assess the infrastructure within and outside factory premises, including pedestrian crossings, see Checklists 4 and 5.

---

**1.4 Abstain from talking to the driver while he/she is driving and do not ask to be dropped off between designated points.**

Do you suggest any action?

- Yes  No  Priority

Comments:.....  
.....  
.....



---

**Part 3: Workers commuting with own vehicle (car or two or three-wheelers)**

**1.5 Are aware of road safety behaviours, respect speed limits and use seatbelts.**

Do you suggest any action?

- Yes  No  Priority

Comments:.....  
.....  
.....



**1.6 Wear good quality helmets in a proper way (if applicable).**

Do you suggest any action?

- Yes  No  Priority

Comments:.....  
.....  
.....



**1.7 Are aware of the dangers of being distracted in traffic** and of traffic regulations, and follow them (e.g.,they do not drive under the influence of alcohol and/or drugs).

Do you suggest any action?

- Yes
- No
- Priority

Comments:.....  
.....  
.....



## 2. Safe transport available for commuting

---

### The basics

- **Safe vehicles play a critical role in averting crashes and reducing the likelihood of serious injury to commuters.** Research indicates that national regulations and requirements for newly produced vehicles could save many lives (e.g., crash impact regulations, electronic stability control, airbags and seatbelts in all vehicles). Some of these requirements are immediately relevant to commuters and are mentioned in the section above. They include the use and availability of **seats and seatbelts for all passengers**, ensuring that **the vehicle is regularly inspected as per national law and in compliance with safety standards certified by a competent authority or organization but also regularly serviced**. Ensuring that vehicles are **not overloaded**, is also important to protect commuters.
- **In the case of employer-provided commuting services, safety requirements should be spelled out in formal contracts between the employer and the transport provider.** Safety requirements also need to be regularly monitored, preferably by trained staff/mechanics. Maintaining vehicle logbooks is a good way to keep track of incidents, frequency of vehicle maintenance and of formal inspections, drivers and licenses.
- **Flatbed trucks used for collective transport are generally not considered safe vehicles for commuters.** Where these vehicles are nevertheless used, it is recommended that vehicles should be fitted with seats and preferably seatbelts, even when this decreases the capacity.
- **There are ways to influence the safety standards of collective transport used by commuters.** When employers provide workers with transport allowances, it is recommended for this allowance to be paid directly to the transport operators. This gives the employer leverage to demand higher safety standards from transport operators.



# Checklist 2

## Availability of safe transport for commuting

Checklist 2 is divided into two parts:

- i) Employer-provided transport, and
- ii) Public transport.

The committee is encouraged to use the checklists relevant to the commuting practices at the factory. Checklists can also be combined to come up with the most relevant set of questions.

### Suggested methods

**Discussion within the committee:** This checklist can be completed by the committee and in close collaboration with an employer representative, for example the transport manager or the official responsible for commuting vehicles. If information about possible employer-provided transport is lacking, **observations** can be used to complete the checklist.

### Part 1: Employer-provided transport

**2.1** Existence of a **formal (written) contract** between the employer and the service-provider(s) (as opposed to a verbal agreement).

Do you suggest any action?

- Yes
- No
- Priority

Comments:.....  
 .....  
 .....



---

**2.2** The contract contains explicit requirements regarding **vehicles** provided (e.g., regular vehicle maintenance service), requires the service provider to enter into formal contracts if subcontracting vehicles, and contains explicit requirements regarding drivers (e.g., valid license).



Do you suggest any action?

Yes  No  Priority

Comments: .....

.....

.....

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**2.3** **Safe pick-up/drop off points** close to the home of workers have been identified and are used.



Do you suggest any action?

Yes  No  Priority

Comments: .....

.....

.....

---

## Part 2: Public transport and transport between drop-off/pick-up point and home

**2.4** **There are safe transport options available** to commuters when moving between their home and the pick-up/drop-off point.

Do you suggest any action?

Yes  No  Priority

Comments: .....

.....

.....

---

2.5 Public transport options **comply with safety standards** (e.g., seats and safety belts for all passengers; safe drivers).

Do you suggest any action?

Yes  No  Priority

Comments:.....  
.....  
.....



2.6 The employer understands the benefits of a safe commute for workers, making corresponding investments to enhance commuting safety, and engaging on this matter with other road safety stakeholders (e.g., local government or traffic police) as relevant. and **engages other road safety stakeholders** (e.g., local government, NGOs, local traffic police) to enhance commuting safety.

Do you suggest any action?

Yes  No  Priority

Comments:.....  
.....  
.....

2.7 The employer **monitors the service provided and keeps logbooks for all vehicles and their drivers** to ensure contract compliance and that identified issues are promptly addressed.

Do you suggest any action?

Yes  No  Priority

Comments:.....  
.....  
.....



## 3. Assessing collective transport vehicles and their drivers

---

### The basics

- **The risk of accidents increases when vehicles used for collective transport are modified, poorly maintained or inappropriately used, such as through overloading. The risk is higher when vehicles that are not designed to transport people are used to transport commuters.** Many garment workers travel to work by using privately owned and operated trucks, which are often converted from or used as goods trucks. Such trucks are usually overcrowded and lack seats. **When a crash occurs, drivers and passengers in vehicles that lack seats and seatbelts are likely to sustain more severe injuries.** It is important that commuters know how to assess the safety of available transport for commuting.
- **For commuters to know that collective transport vehicles are fit for transport and up to standards,** including technical standards such as functioning brakes, tyres, indicators and lights, these vehicles should display an easy-to-see sticker or certification obtained through regular and formal inspections. To ensure that private vehicle operators have access to this service, employers, factory owners and/or factory-level OSH committee members could engage with the appropriate authority or certification organization to facilitate more regular **inspection and certification of collective transport vehicles.**
- Formal (annual) vehicle inspection often needs to be complemented by regular service per defined distance (in kilometres) since commuting vehicles often drive long distances and parts may need to be replaced or repaired long before formal vehicle inspection are due. A list of dates of vehicle maintenance service (programmed and conducted) can be posted in the vehicle to allow commuters to check.
- **In the case of an accident, the collective transport vehicle should be equipped with first aid kits** as well as tools to break open windows and doors to ensure easy evacuation of passengers from the vehicle. **Ideally, the driver should have first-aid training** and training on how to behave in an emergency situation.

- **Drivers of collective transport vehicles should have a driver's license on display and follow traffic regulations** (e.g., avoid speeding, dangerous take-overs, only drop passengers off at designated areas and drop-off zones).
- Distraction is a common cause of accidents, and many countries have laws that prohibits the use of mobile phone while driving. **Drivers should not allow themselves to be distracted while driving and should refrain from using the mobile phones and from speaking to passengers while driving.**

**When assessing the safety of collective transport vehicles, committee members should look at the following:**

- Seats for all passengers;
- Seatbelts for all seats;
- Overloading (are there more passengers than seats?);
- Certificate of regular checks/inspection of vehicle;
- Whether the driver's licence displayed matches the driver driving the vehicle.



Sticker developed by a commuting safety project in Cambodia. Stickers were given to drivers who showed commitment to safe driving and commuter safety.

**When assessing how safely the driver of a collective transport vehicle is driving, committee members should determine:**

- Whether the driver has a driver's license;
- Speeding;
- Safe/unsafe take-overs;
- Whether the driver uses a cell phone while driving or speaks to passengers while driving;
- Use of alcohol or drugs.

Posters and stickers can be designed and used to build commuter awareness of how to assess collective transport vehicles and their drivers.

**CHOOSING SAFE TRANSPORT**  
YOUR LIFE IS IN THEIR HANDS  
DO YOU TRUST YOUR DRIVER TO GET YOU TO WORK AND HOME SAFELY?

**DRIVER SAFETY**  
AVOID OVERLOADED AND UNSEATED VEHICLES:  
Traveling in an overloaded vehicle without seats puts you at greater risk of being injured in a road crash.

**A PASSENGER VEHICLE SHOULD HAVE:**

- PROPER SEATING:** This is required by law. This helps to prevent overloading
- SEATBELTS:** Wearing a seatbelt reduces the risk of being ejected from a vehicle and suffering serious or fatal injury.
- WORKING PARTS:** Rear-view and side mirrors, lights, tires, and brakes in good condition.
- VALID VEHICLE REGISTRATION/PERMIT:** A valid technical vehicle inspection certificate and/or stamp must be available on request

**HOW A SAFE DRIVER BEHAVES:**

**A SAFE DRIVER:**

- Observes the traffic law and obey speed limits
- Does not overtake dangerously or drive aggressively
- Pays attention to the road while driving (not using the phone)
- Only drives sober
- Safely drops off passengers
- Is receptive to feedback about vehicle and driver safety

**WHAT TO DO IF YOU HAVE OR SEE A PROBLEM**

- Promptly report all road crashes and any related injuries to police and seek medical treatment for any injuries
- At the factory promptly report crashes or near misses to supervisor and/or administration
- If you have a safety concern say something

**CHOOSING SAFE TRANSPORT**  
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- If you have a safety concern say something



# Checklist 3

## Assessing collective transport vehicles and their drivers

### Suggested methods

**Observation:** To assess safety standards of collective transport vehicles, committee members are encouraged to observe vehicles used for commuting.

**Focus Group Discussions:** To determine whether commuters can assess the safety records of vehicles and drivers and have the confidence to raise concerns, committee members should organize Focus Group Discussions (FGDs). If there is enough time, FGDs could be conducted with commuters while they are waiting for their transport at the end of the shift.

**3.1** Collective transport vehicles have **seats** and seatbelts for all passengers. They display inspection and maintenance certificates.

Do you suggest any action?

- Yes
- No
- Priority

Comments: .....

.....

.....



**3.2** Commuters know how to assess the safety of a collective transport vehicle and choose vehicles that are fit for purpose (e.g., buses instead of trucks).

Do you suggest any action?

- Yes
- No
- Priority

Comments: .....

.....

.....



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**3.3** Commuters **know how to assess whether the driver of a collective transport vehicle drives safely or not** (e.g., driver does not speed, does not use cell phone or drives under the influence of alcohol or drugs, etc.).

Do you suggest any action?

Yes  No  Priority

Comments: .....

.....

.....

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**3.4** **Vehicle inspection and certification services are available in the area.**

Do you suggest any action?

Yes  No  Priority

Comments: .....

.....

.....



## 4. Safe entry to the industrial park and/or the factory

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### The basics

- Accidents often happen at the pick-up and drop off points, when workers are in rush to get on the next departing vehicle, or to claim a safe spot or a comfortable seat. Factories and/or industrial parks need to be prepared to provide necessary first-aid, with first-aid kits available at entry and exit points. In addition, staff/workers should be trained to offer first aid. Signage that points people needing assistance to the closest clinic, which might be available within an industrial park, should be visible.
- **Different initiatives can contribute to a safe entry to the workplace.** As mentioned earlier, **speed limits** are an important tool to avoid or lessen the impact of incidents – especially when speed limits are enforced.
- **Road infrastructure adjustments can help ensure safe access to and safety inside industrial parks and factory premises.** Examples of infrastructure adjustments include adding physical barriers to separate pedestrians and bicyclists from all vehicles, separate lanes for entry and exit traffic, clearly defined drop-off and pick-up zones, and road bumps to reduce speeding. **Clearly visible road signs** that make road users aware of traffic regulations constitute another useful tool. Road signs can be used to alert drivers of pedestrians in areas where caution is needed, such as pick-up and drop-off areas, pedestrian crossings, but also to discourage pedestrians from crossing the road where it is dangerous to do so. Signs can also inform and remind road users of speed limits and the existence of speed bumps.
- **Speeding in areas where commuters move between their commuting vehicle and the factory entrance is likely to place commuters at risk.** Speed bumps and clearly visible speed limitations can help reduce speeding outside factories. Speed limits within factory premises are recommended to be set at 5 km/h.

Figure 6. Clearly visible road signs





# Checklist 4

## Safe entry to the factory

### Suggested methods

**Observation:** This checklist can be used by committee members doing observations on and around the factory premises during peak arrival and departure hours and during the day and night.

**4.1 Incoming and outgoing traffic are separated.** There are designated footpaths / walkways to separate workers from vehicles inside the factory site/industrial park. Motorcycle access to the factory is separated from other motorized vehicles.



Do you suggest any action?

- Yes
- No
- Priority

Comments:.....  
.....  
.....

**4.2 Lane marking** indicating the direction of travel is clearly indicated, and speed limit signs are in and around the factory premises.



Do you suggest any action?

- Yes
- No
- Priority

Comments:.....  
.....  
.....

**4.3 Pick up and drop off points within the factory premises are well-marked.** They are large enough to fit all vehicles at peak hours, and have clearly marked walk-paths that allow commuters to safely leave and/or reach the vehicles.

Do you suggest any action?

- Yes  No  Priority

Comments:.....  
.....  
.....



**4.4 Pedestrian crossings and motorcycle parkings are well marked and visible at night,** with functional and adequate lighting.

Do you suggest any action?

- Yes  No  Priority

Comments:.....  
.....  
.....



**4.5 Workers feel safe accessing the motorcycle parking after dark.**

Do you suggest any action?

- Yes  No  Priority

Comments:.....  
.....  
.....



## 5. Safety outside the industrial park and/or factory premises

---

### The basics

- The situation around factories, often located close to highways, or in industrial zones, may have limited road safety infrastructure. **Commuter risks increase when workers are dropped off on the highway and must walk the final distance to the factory.** The traffic situation outside the factory may be a typical “mixed traffic situation” where heavy vehicles (trucks and buses) are mixed with cars, motorcycles, cyclists and pedestrians, with the last three categories of road users being particularly vulnerable to accidents. If possible, dropping commuters off inside the factory premises rather than outside can decrease commuter risks for pedestrians.
- While an employer can advocate for and invest in enhanced safety outside of the factory premises, such initiatives would normally require the **involvement of the local government, or the public authority responsible for the relevant road infrastructure.** Different initiatives can contribute to safe access to the workplace. As mentioned earlier, speed limits are an important tool to avoid or lessen the impact of incidents – especially when speed limits are enforced. **Road infrastructure adjustments** can be used to force drivers to lower the speed outside the factory gates, to separate heavy traffic from lighter traffic, and all traffic from pedestrians and cyclists.

#### Interventions can include:

- Robots / traffic lights to stop the traffic and allow pedestrians to cross.
- The presence of traffic management staff to stop traffic and ensure safe crossing for commuters.
- Pedestrian overpasses (bridges) to allow commuters to cross the road over the traffic (see image).
- Refuge islands, where space is made in the middle of the road if pedestrians need to let traffic pass while crossing the road (this may not be the best option for situations where a large number of commuters move at the same time, such as during peak hours).
- Street signs to alert drivers that pedestrians are likely to cross the road at this point.
- Speed limitations and signs to alert drivers of the lower speed limits around the pedestrian crossing.



## Checklist 5

### Safety outside the industrial park and/or factory premises

#### Suggested methods

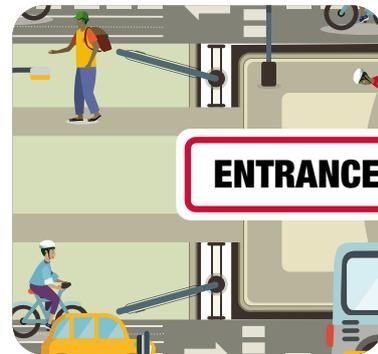
**Observation:** This checklist can be used by committee members doing observations on and around the factory premises during peak arrival and departure hours and during the day and the night.

**5.1** There is a **pedestrian crossing located close to the factory** entrance/exit of the industrial park/factory. It is well marked and clearly visible. Workers use this crossing when entering / exiting the industrial park/factory.

Do you suggest any action?

- Yes  No  Priority

Comments:.....  
.....  
.....



**5.2** There is **traffic management** (e.g., police, designated employees, local authorities, others) in place to assist workers to cross the road during peak times.

Do you suggest any action?

- Yes  No  Priority

Comments:.....  
.....  
.....



5.3 **Footpaths** provide pedestrians with safe access to the industrial park/factory entrance on both sides of the road (left and right). Footpaths are separated from the road through safety barriers.

Do you suggest any action?

- Yes
- No
- Priority

Comments: .....

.....

.....



5.4 The **road outside the industrial park/factory entrance/exit** is designed to lower the speed of vehicles, for example through the use of speed bumps.

Do you suggest any action?

- Yes
- No
- Priority

Comments: .....

.....

.....



5.5 The Industrial Park Authority or factory management (as relevant) **engages with local authorities** to ensure that road safety infrastructure is in place outside the entrance/exit.

Do you suggest any action?

- Yes
- No
- Priority

Comments: .....

.....

.....

## 6. Commuting safety concerns can be raised by workers and are addressed

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### The basics

- For commuter safety to become a reality, it is important that concerns can be raised and that these concerns are prioritized and promptly addressed. **Commuting safety should be considered part of OSH within the factory.** Commuting safety risks should be addressed in the same way that other OSH risks are addressed, and should involve staff responsible for OSH and commuting safety.
- **There should be an OSH committee in the factory that can receive and respond to safety concerns.**
- The OSH committee should be **gender representative** to ensure that women as well as men feel confident to report gender-specific concerns, such as sexual harassment.





# Checklist 6

## Voicing safety concerns

### Suggested methods

**Discussion within the committee:** Questions can be answered using existing knowledge about the factory and commuter safety.

**Focus Group Discussions:** It is recommended that a few committee members conduct FGDs with commuters. If possible, separate discussions should be held with men, women and people with disabilities to ensure that group-specific information is gathered and to facilitate a free exchange of ideas. FGDs can be guided by the questions below.

**6.1** There is a bipartite safety and health committee (**OSH committee**) or some sort of complaint mechanism available at the factory through which workers can raise concerns about commuting safety risks.

Do you suggest any action?

Yes  No  Priority

Comments: .....  
.....  
.....



**6.2** All commuters know how to report a commuting incident or safety concern to the person responsible for commuting services and/or the OSH committee. They feel comfortable doing so, and the employer seeks to take immediate action to address the concerns that fall within its control.

Do you suggest any action?

Yes  No  Priority

Comments: .....  
.....  
.....



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**6.3** Concerns about commuting safety risks raised by workers are **discussed** and **efforts are made to address these concerns**.

Do you suggest any action?

Yes  No  Priority

Comments: .....

.....

.....



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**6.4** There is a complaint mechanism available through which **women workers** are able to raise concerns about **gender-related safety risks** while commuting.

Do you suggest any action?

Yes  No  Priority

Comments: .....

.....

.....



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**6.5** There is a complaint mechanism available through which **workers with disabilities** are able to raise concerns about safety risks while commuting.

Do you suggest any action?

Yes  No  Priority

Comments: .....

.....

.....



## 7. Commuters' preparedness in case of accidents

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### The basics

- **Delays in detecting and providing care for those involved in a road traffic crash increase the severity of injuries.** Treatment of injuries after a crash is extremely time-sensitive: delays of minutes can make the difference between life and death. Commuters can save time by quickly alerting the relevant emergency services, and providing first aid while waiting for assistance. Emergency health care can also act more effectively and efficiently if emergency personnel have access to the relevant health information of the victim such as a blood type card,<sup>9</sup> etc.
- Several countries require **first aid training for drivers** before issuance of driving licenses, and many countries require that all drivers carry basic first aid supplies. First aid programmes have proven effective, in particular when incorporated into existing training programmes for other professionals, such as police and taxi drivers. Providing all commuters with first aid training is likely to have a positive effect on commuting safety.
- **To facilitate potentially life-saving actions until professional help is available, it is important that legislation is in place to protect those who assist the injured.** In countries without such legislation and bystanders who assist the injured may face a range of serious financial, legal and social consequences. It is important to know the current laws in your country to ensure that bystanders who are able to, can safely provide first-aid when needed.
- **Assistance services are organized differently in different countries.** While the global recommendation is that assistance services are centrally coordinated and reachable through one single emergency number, this is not yet true in all countries. Emergency services may be linked to insurance options (see more about insurance in the next section). The committee should explore the emergency assistance options available to commuters. Commuters need to

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<sup>9</sup> If permitted by country regulations and/or country labour codes.

have the relevant information (such as the emergency telephone number) to be able to quickly and efficiently access emergency services.

- Employers should register workers with the national institution responsible for workers' compensation, employment or work injury benefits or social security to ensure that workers are effectively covered against work accidents and occupational diseases. Employers should pay the contributions or premiums for such coverage and should notify the responsible institution in case of a work-related accident or occupational disease.<sup>10</sup> This means that workers should be insured in cases of employment injury. The possibility of expanding this insurance to also cover commuting accidents could be considered in light of national conditions and circumstances.



Lao PDR, ILO 2019.

<sup>10</sup> ILO CoP for Safety and health in textiles, clothing, leather and footwear (2022).



# Checklist 7

## Commuters' preparedness in case of accidents

### Suggested methods

**Focus Group Discussions:** This checklist focuses on commuters' preparedness and knowledge of how to behave in case of road crashes / accidents. Answers to questions should be based on information collected from the commuters themselves. Information can be collected through FGDs with commuters, and if possible, with women, men and workers with disabilities in separate groups. Discussions can be guided by the questions included in the checklist below.

**7.1** Commuters know the telephone number to call for the most effective **emergency services** and how to quickly secure emergency assistance services when the accident occurs within the factory premises.

Do you suggest any action?

- Yes
- No
- Priority

Comments:.....  
 .....  
 .....



**7.2** **First aid training and refresher trainings are regularly offered** to all commuters/ workers and commuting vehicle drivers, for them to know how to provide first aid in the event of an accident.

Do you suggest any action?

- Yes
- No
- Priority

Comments:.....  
 .....  
 .....



**7.3** Commuters have a **blood type card** (or a card showing blood type and other essential health information) in case they are involved in a commuting accident and need emergency health care.<sup>11</sup>

Do you suggest any action?

- Yes  No  Priority

Comments:.....  
.....  
.....



**7.4** Commuters are covered by an employment injury insurance scheme. They are aware of insurance options relevant for commuting accidents, and know which **clinics or hospitals** they have access to through insurance or through their employer in case of commuting accident.

Do you suggest any action?

- Yes  No  Priority

Comments:.....  
.....  
.....



<sup>11</sup> If permitted by country regulations and/or country labour codes.

## 8. Enhanced collection of commuter accident data

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### The basics

- **Data on commuting accidents is needed to effectively design and implement evidence-based policies and strategies to address commuting safety issues.** Commuters should be encouraged to report accidents, but also near-misses or other dangerous occurrences that could result in accidents if not addressed.
- The reporting, recording and notification of commuting accidents are guided by P155 - Protocol of 2002 to the Occupational Safety and Health Convention, 1981.<sup>12</sup> It is important to note that this protocol considers commuting accidents on par with other OSH accidents or dangerous occurrences.
- Workers should **report** commuting accidents to their immediate supervisor, the person appointed, or any other specified person or body. **Reporting ensures that there is a written record of all dangerous occurrences and of any occupational accident – including commuting accidents –.**
- Employers should **record** commuting accidents. The employer should also **notify** the competent national authority of commuting accidents.
- Employers are also expected to keep workers and their representatives informed about commuting accidents that have been recorded and notified to ensure the proper maintenance of records and to ensure that data can be used for the establishment of preventive measures.
- ILO standards **prohibit an employer from instituting retaliatory or disciplinary measures against a worker** for reporting an occupational accident, occupational disease, dangerous occurrence, commuting accident or suspected case of occupational disease.

#### More information is available here:

[Reporting, Recording and Notification of Occupational Accidents and Diseases: A brief guide for workers](#)

[Reporting, Recording, and Notification of Occupational Accidents and Diseases: A brief guide for employers and managers](#)

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<sup>12</sup> See Protocol P155 - Protocol of 2002 to the Occupational Safety and Health Convention, 1981 (ilo.org).



## Checklist 8

### Data collection and use

#### Suggested methods

**Discussion within the committee:** This checklist can be considered and discussed by committee members, including the employer's representative.

**8.1** Workers are aware that safety risks encountered while commuting to and from work should be reported to their employer, and they know how to report it.

Do you suggest any action?

Yes  No  Priority

Comments:.....  
.....  
.....



**8.2** The employer has identified a competent person to receive and record information reported about commuting accidents, has **informed workers** of recording arrangements, and has set up arrangements within the factory, in accordance with national laws or regulations, to notify the competent authority of commuting accidents.

Do you suggest any action?

Yes  No  Priority

Comments:.....  
.....  
.....



**8.3** The employer has set up arrangements within the factory to ensure that reported **data is analysed and used to prevent commuting accidents.**

Do you suggest any action?

- Yes
- No
- Priority

Comments:.....  
.....  
.....



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## Annex A: The theory of change

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This manual is based on a participatory Theory of Change (ToC) developed by ILO's Vision Zero Fund in 2022. It aims to identify interventions that could reduce commuting accidents involving workers in the garment and footwear sectors. The ToC is presented below.

The ToC is based on a literature review, discussions with representatives of organizations working specifically with road safety, such as AIP Foundation, DEKRA, Global Road Safety Partnership (GRSP), IOSH and Solidarity Center in Cambodia, as well as consultations with ILO specialists.

**The approach is based on the understanding that improving commuting safety is not responsibility of one actor alone. All major stakeholders need to work together – collectively – and assume responsibility, consistent with their respective mandates, to address systemic issues that lie at the root of commuting accidents.**

Workers making informed decisions and actively avoiding and/or mitigating known commuting risks is a key outcome of the proposed approach (Outcome 1). While the outcome focuses on the worker's ability to make sound decisions in commuting to and from work, it is understood that this ability is affected by available commuting options, traffic regulations and enforcement of those regulations, as well as the overall road conditions and infrastructure. While many of these aspects are the responsibility of governments, the manual helps workers and employers to jointly explore ways to address commuter safety issues that go beyond individual commuter knowledge, attitude and behaviour.

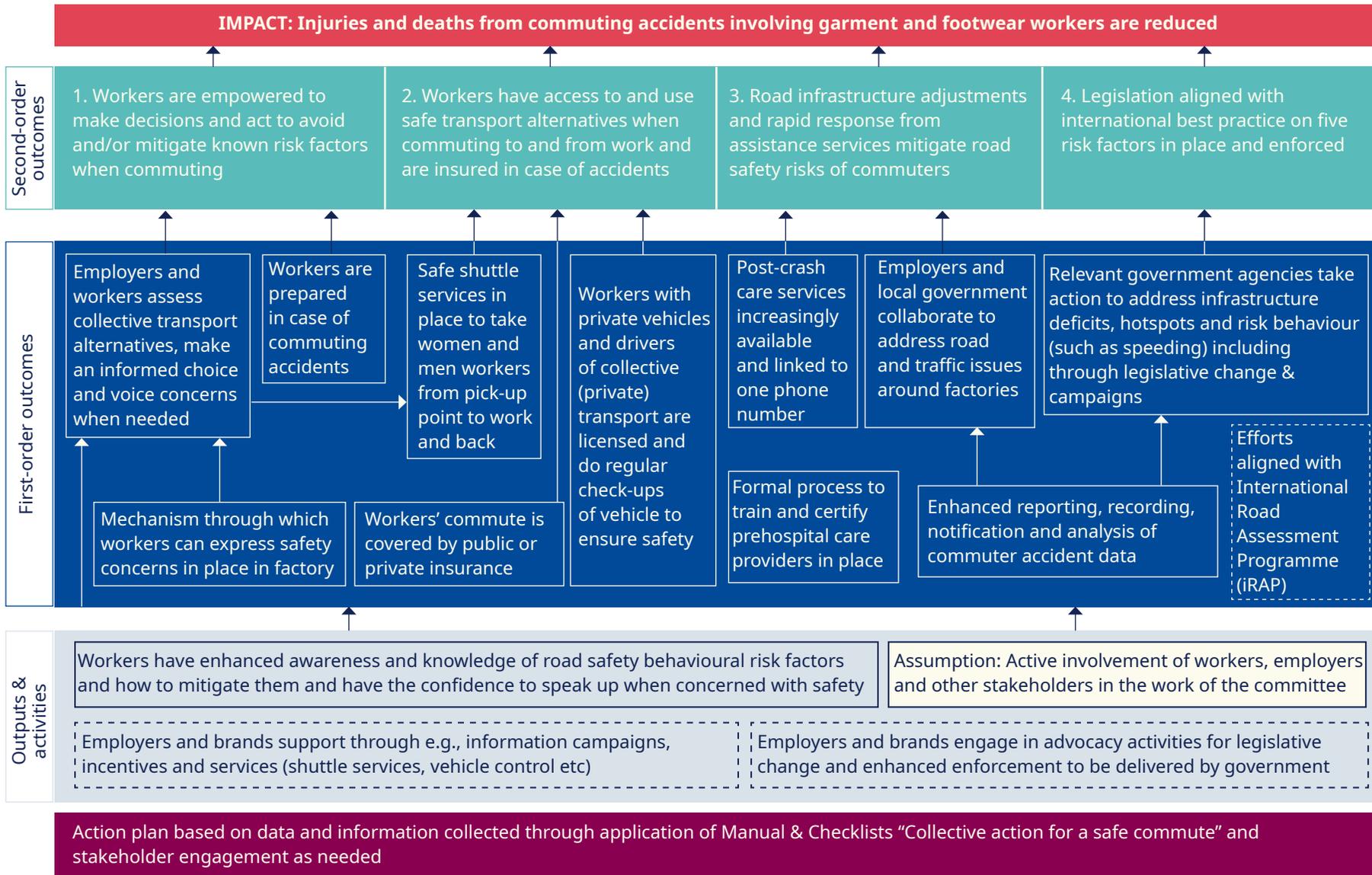
Action taken to enhance commuter safety will contribute to several **Sustainable Development Goal (SDG) targets**, namely:

Target 3.6 (to halve the number of global deaths and injuries from road traffic accidents by 2030),

Target 8.8 (to protect labour rights and promote safe and secure working environments for all workers, [...]), and

Target 11.2, (to provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations [...]).

# Theory of change for enhanced commuter safety



## Theory of change – an overview of the different results levels



# Annex B: Action plan template

Action plan summary			Follow-up on implementation		
Area of change (manual chapter)	Description of problem	Suggested action	Improvement proposal formulated (yes/no)	Proposal approved by management (yes/no)	Implementation progress*

\*For example, you can put "Started", "Advanced", or "Completed".





# VISION ZERO FUND

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Labour Administration, Labour Inspection  
and Occupational Safety and Health Branch  
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