

Appendix A:

Submissions and comments

We have consulted with the department, Victoria Police and Jenoptik, and we considered their views when reaching our audit conclusions. As required by the *Audit Act 1994*, we gave a draft copy of this report, or relevant extracts, to those agencies and asked for their submissions and comments.

Responsibility for the accuracy, fairness and balance of those comments rests solely with the relevant agency head.

Responses received

Agency	Page
Department of Justice and Community Safety	A-2
Jenoptik Australia	A-5
Victoria Police	A-6



Department of Justice and Community Safety

Secretary

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Melbourne Victoria 3000
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Our ref. 26045333

Mr Andrew Greaves
Auditor-General
Victorian Auditor-General's Office
By email: [REDACTED]

Dear Mr Greaves

Proposed report: Reducing the harm caused by distracted drivers

Thank you for your letter of 24 April 2026 providing the proposed report for the audit on *Reducing the harm caused by distracted drivers* for final comment.

The Department of Justice and Community Safety (the department) remains committed to improving road safety and reducing deaths and serious injuries through the delivery of the distracted driver and seatbelt road safety camera program.

Thank you for giving us the opportunity to comment on the audit. The department has requested changes from your audit team on the representation of research estimates as targets. The department has no further comment on your report.

The attached action plan, due for completion in December 2026, addresses the three recommendations directed to the department. Many of the actions are in progress, including a review of the benefits management plan, updates to baseline data and more frequent reporting against benefits. The department is also currently reviewing all the program's procedures for compliance with privacy requirements.

If you have any questions or require further information, please contact Fiona Dowsley, Executive Director and Chief Statistician, Data, Performance and Governance [REDACTED] or via email to [REDACTED]

Yours sincerely

Emma Cassar
Secretary

11 / 05 /2026



DJCS action plan

Reducing the harm caused by distracted drivers

#	VAGO recommends that DJCS:	Response	#	DJCS will:	By:
1	<p>Improve how it assesses the program's contribution to road safety by establishing:</p> <ul style="list-style-type: none"> a way of measuring accidents that can attribute serious injuries and deaths to distracted driving and seatbelt non-compliance as soon as practicable consistent, regular reporting on the program's performance against expected benefits to departmental stakeholders. 	Partially accept	1.1	<p>Review the DDS Benefits Management Plan and:</p> <ul style="list-style-type: none"> in collaboration with Transport Accident Commission, explore introducing a benefit to measure how public awareness and education contributes to DDS deterrence and compliance update benefits reporting frequency commencing 1 July 2026 update baseline data to make use of available historical and program data where possible. 	30-Jun-26
			1.2	<p>Commission Monash University Accident Research Centre to independently review the BMP to ensure the benefits (KPI, measure, baseline, target and data source) are fit for purpose and measurable and update the plan if necessary.</p>	30-Jun-26
			1.3	<p>Complete the BMP Power BI dashboard, that includes baseline data, to support ongoing BMP reporting.</p>	31-Jul-26
			1.4	<p>Complete. DJCS does not accept the second dot point as it currently provides, and will continue to provide, regular reporting on program performance</p>	08-May-26
4	<p>Review its procedures to make sure it does not keep images for longer than allowed under the Road Safety (General) Regulations 2019.</p>	Accept	4	<ul style="list-style-type: none"> Review all DDS processes and procedures against image retention and privacy requirements. Review the DDS Privacy Impact Assessment and update, if required. Implement required changes to storage, retention and deletion processes and procedures to adhere to privacy requirements. 	31-Jul-26



#	VAGO recommends that DJCS:	Response	#	DJCS will:	By:
5	Independently verify Jenoptik's data where Jenoptik self-reports on its key performance indicators.	Accept	5.1	Procure an independent third-party auditor, available under the existing DDS Services Agreement, to audit the accuracy of Jenoptik's data and associated reporting.	01-Jul-26
			5.2	Address the recommendations of the independent audit.	31-Dec-26
			5.3	Explore the requirement for DJCS to implement a 'DDS Data Quality Statement' and a 'DDS Data Quality Management Plan'.	30-Jun-26



JENOPTIK Australia Pty Limited - Unit 13, 12 Mars Road - Lane Cove NSW 2066

VAGO
Victorian Auditor-General's Office
Andrew Greaves
Level 31, 35 Collins Street
Melbourne VIC 3000

Your reference 35013 26
Your letter dated 24 April 2026
Our reference

Contact Ritchie Jones
Phone
Fax
E-mail

Re: Proposed report - Reducing the harm caused by distracted drivers

07/05/2026

Dear Mr Greaves,

Thank you for providing the proposed report. We confirm receipt and acknowledge its contents.

Best regards

Ritchie Jones
Interim Managing Director
Smart Mobility Solutions

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VICTORIA POLICE

04 May 2026

Our Ref: FF279985

Mr Andrew Greaves
Victorian Auditor-General
Level 31, 35 Collins Street
Melbourne VIC 3000

Victoria Police Centre
311 Spencer Street
Docklands VIC 3008

Dear Mr Greaves

Thank you for the opportunity to provide a response to the provisional report *Reducing the harm caused by distracted drivers*, dated 24 April 2026.

Victoria Police welcomes the review of the Distracted Driver and Seatbelt (DDS) program as the road safety partnership looks to mature this aspect of the road safety camera program.

As identified by road safety experts, and acknowledged during the audit process, there is currently limited specific data linked to distraction and seatbelt related offences. As part of furthering improvement Victoria Police commits to intelligence-informed approaches and building an evidence base of environmental and behavioural factors to better inform site selection processes.

Victoria Police accepts that governance processes to manage the identification of potential sites for camera locations could be improved. A contemporary review of the site selection criteria and general record-keeping processes will be conducted to improve confidence that enforcement operates in a manner which positively supports compliance with the road rules and aligns with the objectives of the program.

I am pleased to advise that work on these improvements is already underway. The attached action plan outlines Victoria Police's commitment to delivering on the intent of recommendations 2 and 3 by 30 June 2027.

As identified by VAGO, Victoria Police has collaborated well with the Department and Jenoptik to ensure the integrity of the camera program. Victoria Police remains committed to maintaining this collaboration to improve the operation and outcomes of the DDS program.

Victoria Police thanks the VAGO audit team for the professionalism and collaborative approach throughout this audit process.

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In closing, Victoria Police reiterate that 'Anytime, Anywhere' enforcement is a critical road safety lever to drive behaviour change in motorists. Across the 300 locations used for DDS enforcement to date non-compliance has been detected at all sites, supporting the continued need for this vital asset.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Mike Bush', with a stylized flourish at the end.

Mike Bush
Chief Commissioner CNZM

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Victoria Police action plan to address recommendations from Reducing the harm caused by distracted drivers performance audit

No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
2	<p>Review and revise its camera site selection criteria to ensure they are evidence-based, including by:</p> <ul style="list-style-type: none"> amending or removing criteria that rely on data that cannot be reliably linked to relevant behaviours clearly defining what would be sufficient and complete evidence to meet each criterion (see Section 4). 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> In part <input type="checkbox"/> In principle	<p>Victoria Police will conduct a contemporary review of the site selection criteria and supporting evidence to ensure alignment with road safety outcomes related to driver distraction and seatbelt non-compliance.</p>	<p>March 2027</p>
3	<p>Strengthen its documentation and quality assurance processes to make sure it can demonstrate how it identifies camera sites, including by:</p> <ul style="list-style-type: none"> keeping complete records of the evidence it uses to identify all sites accurately recording referral sources and assessment outcomes periodically reassessing sites to check they still meet the criteria (see Section 4). 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> In part <input type="checkbox"/> In principle	<p>Victoria Police will implement improved record-keeping practices to ensure consistent and transparent documentation of decision-making processes relevant to site selection.</p>	<p>June 2027</p>

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