



### Management of Road Risk Policy

DOCUMENT CONTROL	
Owner:	Gill McInnes
Author:	Fay McNicol
Document Control:	HR Services
Date Approved:	October 2018
Review/Approval Group:	Area Health and Safety
Review Due/Cycle	Sept 2021

#### Related Documents:

- HS014a: Management of Road Risk – Individual Risk assessment
- HS014b: Management of Road Risk – Journey Risk assessment
- HS014c: Management of Road Risk – Guidance for Employees and Managers
- HS014d: Management of Road Risk - Annual Driver Declaration- CMV2

### **Policy Statement**

NHS 24 aims to ensure the health, safety and welfare of its staff and to avoid risk or injury to third parties. It recognises the risks to staff that may require to drive in connection with work and is committed to the prevention of injury, loss of life and damage to property from work-related driving incidents. The purpose of this policy is to enable NHS 24 to meet its obligation to protect staff so far as is reasonably practicable, from all occupational road risks associated with work-related driving.

### **Policy Aims**

To reduce all types of accident that result from work related driving. Achieving this goal will reduce:

- Injuries to staff and third parties, including patients
- Damage to NHS 24 vehicles
- Liability for damage to third party vehicles and property
- Administration and other costs

This policy aims to:

- Establish a safety culture, i.e.: one in which when driving or journey planning, safe driving has a natural priority in the minds of both managers and drivers
- Increase staff awareness of safety issues associated with work-related driving risks;
- Ensure that risk in relation to work-related driving is assessed in a systematic and ongoing way, and that safe systems and methods of work are put in place to reduce the risk, as far as is reasonably practicable;
- Ensure that appropriate training and or guidance is available to staff in all areas, which equips them to recognise risk and that practical advice on preventing and managing occupational road risks is provided;
- Ensure that appropriate support is available to staff involved in work-related driving incidents;
- Encourage full reporting and recording of all incidents arising in the course of work-related driving;

### **Scope**

This policy applies to all staff involved in work-related driving activities, including drivers of all NHS 24 service vehicles; leased-car, hire car, and employee owned vehicles where used for business purposes. The policy applies to all work-related driving arising in connection with the duties and activities of NHS 24.

### **Definitions of Work-Related Driving**

NHS 24 defines work-related driving as:

***“Any driving activities carried out by employees or any person authorised to drive on NHS 24 business”.***

NHS 24 and ROSPA define a “long Journey” as:

***“Any journey more than 120 miles in distance or any journey where it is likely that the journey time will exceed 2.5 hours (excluding any breaks)”***

### **Responsibilities**

The **Chief Executive** is responsible for:

- Developing an organisational culture that assumes safety first
- Ensuring there are arrangements for identifying, evaluating and managing risk associated with work-related driving ;
- Providing resources for putting the policy into practice;
- Ensuring that there are arrangements for monitoring incidents linked to work-related driving and that NHS 24 regularly reviews the effectiveness of the policy.
- Where practical encourages the use of public transport or other methods of communication such as video and telephone conferencing.

### **Director of Workforce**

- Communicating fleet safety culture by both acts and deeds
- Acts as the Executive lead for the implementation of all Health and Safety Policies (including this one)

**Directors and Heads of Departments** are responsible for:

- Communicating fleet safety culture by both acts and deeds
- Ensuring that this policy is implemented within their directorates and departments
- Ensuring that systems are in place which identify, evaluate and facilitate the management of Work Related Driving Risks
- Monitoring incidents related to Work Related Driving, reviewing the effectiveness of this policy and reporting issues arising to NHS 24 via the HR Department, Management Teams and Health & Safety Committee(s).
- Where practical encourage the use of public transport or other methods of communication such as video and telephone conferencing.

**Line Managers** are responsible for:

- Communicating fleet safety culture by both acts and deeds
- Ensuring that all relevant staff are aware of the policy;
- That all staff are competent to drive the vehicle issued
- Line Managers must take account of any circumstances which may affect the ability of a member of staff to drive safely
- Ensuring that risk assessments are carried out as required;
- Putting into place procedures and safe systems of work to eliminate or reduce the likelihood of work-related driving incidents;
- Ensuring that staff identified as being at risk are given appropriate information, instruction and training
- Ensuring that appropriate support is provided to staff involved in any incident associated with work-related driving;
- Ensuring completion of recording and monitoring systems, including incident reporting and recording procedures.
- Where practical encourage the use of public transport or other methods of communication such as video and telephone conferencing.
- That staff using their own cars on NHS 24 business have completed the declaration form (HS014d), and that this is reviewed on an annual basis as a minimum.
- Ensuring that HR Department is aware of all staff using their own car for business purposes where business mileage is in excess of 8000 miles per annum.
- Ensuring that all staff comply with NHS 24 policy with regard to
  - Driving standards
  - Reversing
  - Vehicle Checks
- All managers must ensure that during the staff induction process, that driver training in the form or E-learning is completed, in the event that work related driving is required.
- Where practical encourage the use of public transport or other methods of communication such as video and telephone conferencing.

**Fleet Service Provider (NSS)** is responsible for:

- Communicating fleet safety culture by both acts and deeds
- Maintaining NHS 24 vehicles to appropriate standards
- Carrying out vehicle inspections (safety checks) on all NHS 24 vehicles used for work related driving
- Providing appropriate Fleet advice, guidance and support to Line Managers and staff;
- Monitoring vehicle related incidents through the Fleet Management Systems where possible.
- Providing Fleet related statistics including financial cost breakdowns and information to the, Finance Department.

**Education and Training Provider (NSS)** are responsible for:

- Communicating fleet safety culture by both acts and deeds
- Providing appropriate driving assessments for staff who are required to drive in connection with their work;
  - Lease car drivers receive defensive driving session
  - Grey fleet users (>8000 business miles) should also receive defensive driving or e-learning
- Advising Line Managers and staff of the outcomes of driving assessment and re-assessment, and assisting in the achievement of solutions.
- Where practical encourage the use of public transport or other methods of communication such as video and telephone conferencing.

**Staff** are responsible for:

- Prioritising safe driving at all times
- Complying with all aspects of the Highway code
- Ensuring they are familiar with the Work-Related Driving Risk procedures for their area of work;
- Staff must advise their line manager of any permanent or temporary change in health and any other circumstances that could affect their ability to drive.
- Taking reasonable care of themselves and other people who may be affected by their actions and/or omissions;
- Complying with procedures designed for safe working;
- Reporting all incidents in relation to work-related driving
- Participating in training designed to meet the requirements of this policy;
- Reporting to their line manager any dangers they identify or any concerns they might have about work-related driving.
- Reporting any changes in personal circumstances that may affect their ability to drive to their line manager
- Where practical use public transport or other methods of communication such as video and telephone conferencing.
- Provide necessary documentation to their line manager on an annual basis

### **Legislation**

The following are pertinent:

- Road Safety Act 2006
- Road Traffic Regulations Act – 1984
- Health & Safety at Work Act – 1974
- Management of Health & Safety at Work Regulations – 1999

Date Live from: October 2018

- Provision and Use of Work Equipment Regulations – 1998
- Working Time Regulations – 1998
- Road Vehicle (Construction and Use)(Amendments)(No 4) Regulations – 2003

[Note- this list is not exhaustive]

### **The Risks of Work-Related Driving**

The number of people who need to drive as part of their work is increasing; the risks to these staff will depend on the nature of situation. Such risks will include but are not limited to:

- Driving in poor weather conditions;
- Driving for long periods;
- Undertaking long journeys;
- The vulnerability of travelling alone;
- Driving in unfamiliar or isolated rural areas;
- Driving in high-risk locations;
- Isolated parking facilities;
- Vehicle breakdowns
- Driving unfamiliar vehicles.
- Driving at night
- Driver error
- Driver Fatigue
- Driving under the influence of alcohol or illegal drugs
- Driving with health conditions that affect driving
- Driving whilst using medications which can impair driving ability
- Individual's level of competence and confidence
- Individual's attitude towards risk taking
- Use of in vehicle technology
- Use of radio systems
- Use of mobile telephones

## **Assessing Risk**

### **Individual Risk Assessment**

Individual risk assessments should be carried out for all staff who are required to drive for business purposes, and have 2 or more RTC incidents in any given 12 month period. This form can be found in HS014a – Management of Road Risk – Risk Assessment.

The risk assessment will involve identifying all potential hazards and the risks associated with specific work-related driving activities. It will identify who may be affected and how, and the control measures which are needed to eliminate or reduce the risk to the lowest level reasonably practicable. Line Managers must ensure that risk assessments are carried out and that they are recorded and shared with all relevant risk groups.

The following details will be recorded:

- the extent and nature of the risks
- the factors that contribute to the risk including job content and specific tasks and activities
- The safe systems of work to be followed to eliminate or reduce the risk.

These details will be communicated to staff, and risk assessments reviewed and updated as and when required

### **Journey Risk Assessment / Planning**

All drivers are advised to carry out risk assessments before beginning any long distance journey(s). This will include assessing the condition of the vehicle, weather conditions and route and their own fitness to drive.

The Journey checklist (HS014b – Management of Road Risk – Journey risk Assessment) should be made available by all departmental managers to their staff who fulfil the definition of work related driving. Staff should be encouraged to use this checklist to plan journeys. There is no requirement to formally complete the documentation, it is an aide memoir.

All staff should consider using internet tools such as multimap, google maps, AA route finder, RAC route finder to assess any journey that is unfamiliar to enable the planning of rest breaks and the overall journey. If planning indicates that you will not be able to reach your destination in time, phone ahead or reschedule the meeting, do not hurry because you are or are going to be late. When travelling in adverse weather use internet tools such as BBC weather, met office and Traffic Scotland live web cams to assess safety of journey.

Maps	<a href="http://www.multimap.com/">www.multimap.com/</a>
Maps	<a href="http://maps.google.co.uk/">http://maps.google.co.uk/</a>
Route Planning	<a href="http://www.theaa.com/route-planner/index.jsp">http://www.theaa.com/route-planner/index.jsp</a>
Route Planning	<a href="http://www.rac.co.uk/route-planner/">http://www.rac.co.uk/route-planner/</a>
Weather	<a href="http://www.bbc.co.uk/weather/">http://www.bbc.co.uk/weather/</a>
Weather	<a href="http://www.metoffice.gov.uk/">http://www.metoffice.gov.uk/</a>
Traffic Conditions	<a href="https://trafficscotland.org/livetrafficcameras/">https://trafficscotland.org/livetrafficcameras/</a>

If your route is new to you, you should ensure that you have an appropriate scaled map or atlas or a SAT NAV device. If you do not have any of these to hand you should print your route off from one of the route planners above.

## **Managing Risk**

### ***Driver Checks and Qualifications***

Drivers may only drive vehicles for which they hold appropriate licences.

- **Car** and **Van** drivers must possess a full and current driving licence

Line Managers must undertake an annual audit of licence, for all staff involved in work-related driving activities. The manager must see the licence and insurance certificate, and the driver and the manager must sign a driver declaration form (HS014d). In cases where the licence or insurance details are not in line with requirements, the staff member will not be allowed to continue to drive on behalf of NHS 24. Staff must inform their line manager about any changes in the status of their licence or their health that could affect their continued driving.

Any member of staff that has been temporarily excluded may be re-instated to driving duties following confirmation by the DVLA of the re-instatement of the individual's licence. However they will be required to undertake a driving assessment and complete any subsequent education and or training that may be recommended as a result of that assessment, prior to recommencing their driving duties.

The following people are specifically excluded from driving NHS 24 vehicles:

- Anyone who does not hold a full, valid UK driving licence for the category of vehicle being driven (or who does not have a relevant foreign or international licence that allows them to drive the requisite category of vehicle in the UK)
- Anyone who suffers from a condition that would disqualify them from holding or getting a relevant current driving licence



- Anyone who has a current conviction for a motoring offence in the following categories:
  - dangerous driving, causing death by dangerous driving, or manslaughter
  - causing death by inconsiderate driving
  - driving under the influence of drink or drugs
  - failing to stop after an accident
  - Any other offence (or combination of offences) which has or might result in disqualification.

If NHS 24 becomes aware of any pending prosecution it can exercise the right to suspend staff from driving duties whilst awaiting the outcome of the prosecution.

### ***NHS 24 Mobile Communications procedure***

The use of a hand-held mobile phone whilst driving is illegal and should not be attempted; there is no exemption to this law. There is compelling evidence to show that the use of a hands-free mobile phone can significantly distract a driver.

Employees driving on behalf of NHS 24 **are not permitted to make or receive** calls whilst driving (this includes text messages) even if they have a hands free kit.

This also includes the use of Blackberries.

Mobile phones can be switched on and the voicemail mode activated.

If the call is urgent then staff are directed to pull in at the earliest and safest opportunity without putting themselves or other road users at risk.

This should be at designated parking areas or bays or motorway service areas. Switch the engine off and ring the caller back when safe to do so.

Seek the advice from the Health and Safety Consultant where necessary

***Further information is available from The Royal Society for the Prevention of Accidents (ROPSA) – [www.rosipa.com](http://www.rosipa.com) and HSE Guide “Driving at Work” [www.hse.gov.uk](http://www.hse.gov.uk) and The Highway Code [www.highwaycode.gov.uk](http://www.highwaycode.gov.uk)***

### **Lone Working**

It should also be noted that where an employee is alone in a vehicle and driving on behalf of NHS 24 then they are considered a lone worker – and therefore this procedure should be read in conjunction with the Peripatetic {Lone Workers} Policy.

## **Secondary Employment**

All staff must comply with the NHS 24 Secondary Employment Policy.

It is essential (and a legal requirement) that any secondary employment is declared to NHS 24, particularly where driving is involved, this should be assessed by the individual and remedial steps taken to ensure suitability to continue secondary employment.

### ***Authorised Drivers for NHS 24 lease and hire vehicles***

Current NHS 24 insurance allows for NHS 24 vehicles to be driven by anyone with the permission of a member of NHS 24 staff authorised to give such permission.

Learner drivers are allowed to drive NHS 24 Vehicles if they are a member of the lease car's registered keeper's family. Tuition for hire or reward is specifically prohibited.

If an unauthorised person drives an NHS 24 vehicle, neither the vehicle nor the driver, is covered by The NHS 24 Motor Insurance.

**[Note** - any person driving an uninsured vehicle is liable to police prosecution, as well as for any damage caused in the event of an accident]

The Driver must be thoroughly conversant with the Highway Code and current laws and regulations, including Health and Safety at Work Act, which governs the operation of vehicles, and you must be familiar with the Road Traffic Act 1988 and amendments, with particular reference to the provisions on drinking and driving, which could result in imprisonment.

### ***Business Use of Employee Owned Vehicles***

Employees may only use their private vehicles on NHS 24 business if the:

- Use is authorised by NHS 24 through official procedures;
- Driver has a valid and current licence for the class of vehicle they will drive;
- Vehicle is insured, by the owner, for business use
- Vehicle has a current MOT Certificate where required
- Vehicle is appropriately maintained and serviced
- Of a suitable type for the work related driving that will be undertaking
- Mechanically sound, roadworthy and compliant with all the legal requirements for a vehicle used on the public highway
- Covered by an appropriate breakdown and recovery service.

Staff Training

NHS 24 will provide basic driver safety training, where identified through risk assessment or job requirements, to give staff the knowledge and skills needed to help prevent and manage work-related driving risks. Different levels of training will be available and the service will provide specialist training if necessary.

Minimum Training standards are:

Lease car drivers, Staff driving in excess of 8000 miles (business) per annum	Defensive driving
---	-------------------

Guidance on musculoskeletal conditions associated with driving for long periods is provided on NHS 24 Intranet

Line Managers are responsible for making sure that staff receive appropriate training and have access to refresher training on a regular basis.

Advice and guidance on basic driver training is available from the HR Department.

**Reporting and Recording**

Staff must report all incidents, including *near misses* (an incident which occurred and had the potential for serious harm, damage or loss, but no serious harm, damage or loss resulted) to their line manager at the earliest opportunity. All incidents must be investigated by the manager. Failure to report an RTC may represent (gross) misconduct.

Incidents involving damage to vehicles and or property must also be reported using the NHS 24 vehicle accident reporting processes

Line Managers will ensure that any RTC that involves a member of staff driving in connection with work is reported immediately using the AIR system

For serious RTC's involving work related driving (Vehicle is not road worthy following the RTC or an individual is injured) the line manager must inform the Health and Safety Consultant immediately and conduct a detailed investigation.

To monitor the implementation and effectiveness of this policy and associated local procedures, Line Managers must regularly review local statistics and incident reports, NHS 24 Area H&S Committee monitors and reviews all reported incidents and near misses.

### **Monitoring and Reviewing**

NHS 24 Area Health Safety Committee will monitor and review this policy, in partnership, with Trade Unions/Professional Organisations and safety representatives.

The review processes will include:

- Analysing incident statistics and safety improvement measures;
- Acting on the outcomes of risk assessment and details of training provided;
- Highlight progress in reducing risk and incidents and making recommendations for the forthcoming year.

The Area Health Safety Committee will have the following primary roles with regard to MORR:

- To generate ideas designed to develop and sustain the culture;
- To review accident statistics and safety performance and respond accordingly.
- Utilise the risk management processes to mitigate and control risk
- Generate ideas designed to develop and sustain the culture.