# MANAGING GREY FLEET SAFETY

A short guide for companies whose staff drive their own cars for work

ETSC
European Transport Safety Council

PRAISE
Work-Related Road Safety

## About PRAISE

Using the roads is a necessary part of our working lives. But it's an ordinary activity that leads to an incredibly high level of injury and death. ETSC's PRAISE (Preventing Road Accidents and Injuries for the Safety of Employees) project addresses the safety aspects of driving at work and driving to work. Its aim is to promote best practice in order to help employers secure high road safety standards for their employees.

The project is co-ordinated by the ETSC secretariat with the support of Fundación MAPFRE, the German Road Safety Council (DVR), the Belgian Road Safety Institute (IBSR-BIVV) and the Dräger Foundation.

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# PART I

# INTRODUCTION

A significant proportion of work-related journeys are now thought to be undertaken in vehicles not owned by the employer. These vehicles, known as the 'grey fleet', may include:

- privately owned vehicles;
- hired vehicles used for work;
- vehicles obtained through an Employee Car Ownership (ECO) scheme.

The use of grey fleets is common across Europe. Although no-EU wide data is available, national data from the UK shows that:

- 40% of work vehicles are grey fleet;
- 14 million grey fleet vehicles are in use;
- 9 million vehicles are used for business journeys on a regular basis;
- 62% of private car use is for work-related activity[1].

The public sector in particular has a significant percentage of kilometres driven by employees using their own vehicles. In the UK, 57% of all public sector distance driven is by employees using their own vehicles.[2] Health care employees making house visits are a common example. In the private sector, estate agents are also likely to use their own vehicle on work business.

In Ireland, most vehicles driven for work are grey fleet. National data shows that these vehicles are often older than the average company car and have a corresponding lower safety rating. Older vehicles, on average, are less safe because vehicle safety standards and standard fitted safety technologies have improved over time.

Employees who use their own vehicles for work may be entitled to reimbursement on a cost per km basis. Some employers specify a maximum distance for staff who only occasionally use their own vehicle for work, beyond which a company or hire vehicle must be used.[3]

When organisations analyse the road journeys that their employees make on their behalf, they often find a significant number of employees who they never considered as 'drivers', and who have never been considered in a work related road safety management context even though they are driving for work.[4] Since 2014, British Telecom has required all drivers (including those using their own vehicles) to provide details of their vehicle's maintenance record. BT's programme is detailed in a case study accompanying this report.

From an employer's point of view, a traditional company car provides a higher degree of control over almost all aspects of its operation. When employees use their own vehicles the level of control may be reduced and this may pose difficulties.[5]

When a driver uses their own vehicle for work, they are still under the responsibility of the employer, and this presents a real challenge for managing associated work related road safety risk. Employers may think that it is easier to manage employees using their own cars for work, instead of a company car fleet. However once all of the considerations are taken into account this may not be the case.

This guide has been produced to help organisations review and improve grey fleet management, with a specific focus on safety concerns. It will explain the legal responsibilities as well as the business benefits of an effective grey fleet management policy. And it will also explain how grey fleet road risks can be reduced through risk assessment, and stress the importance of integrating grey fleet policy in company procedures and management responsibility.

[1] Lex Autolease (2015) The 2015 Lex Autolease's annual Report on Motoring https://goo.gl/6CBrvn
[2] Office of Government and Commerce (2008) Grey Fleet Best Practice
[3] RoSPA (2015) Driving for work : Own Vehicles http://goo.gl/1JA4qJ
[4] Zurich Risk Insurance, 2016, Managing the risk of Grey Fleet.
[5] GE Capital (July 2012) Cash Fleet, Grey Fleet http://goo.gl/R3yi8T

# PART II

# WHY MANAGE YOUR GREY FLEET?

## 2.1 IT'S THE LAW

Duty of care, occupational health and safety and road safety compliance are legal requirements in all EU Member States. The European Framework Directive 89/391/EEC on the health and safety of workers requires that every employer in Europe undertakes a risk assessment according to the principles of prevention.[6] This should include employees travelling for work and cover all aspects of that travel, including grey fleet.

The fact that employees use their own vehicle for business purposes does not absolve the employer from 'duty of care' responsibilities. The law is clear: an organisation has a legal duty of care to an employee, regardless of vehicle ownership, therefore the grey fleet needs to be managed as diligently as company-owned or leased vehicles.[7]

Some European Member States have supplementary legislation detailing employers' obligations for reducing the risks related to driving for work. Member States have also developed specific guidance on applying the Framework Directive to work related road safety. Employers are responsible for ensuring that they are compliant with this EU and national level legislation.

In this context, the employer is responsible for answering questions such as:

- Does the driver have the right skills?
- Is the driver's licence valid?
- Is the vehicle suitable for the task?
- Is the vehicle well maintained and insured for business travel?

Keeping an audit trail of these requirements is crucial, especially if a collision occurs. This will be covered in more detail in part 4 of this report. In some countries, it is an offence under road traffic law to 'cause or permit' a person to drive without a valid licence or third party insurance or to drive a vehicle that is in a dangerous condition.[8]

## 2.2 IT CAN BE GOOD FOR BUSINESS

The business case for road safety is centred on the prevention of harm to persons and the protection of property and the environment. It involves managing road safety in a proactive way for financial, moral and legal reasons with the aim of overseeing drivers, journeys and vehicles. These factors apply equally to the grey fleet, both vehicles and drivers.

**For more information:**
http://etsc.eu/5kzYY


There are convincing economic arguments for preparing and implementing a work related road risk management (WRRM) programme. Typically, it has been common for organisations to focus on fleet safety following a high cost collision or death. ETSC strongly advocates taking a proactive approach; this will bring benefits in other areas such as quality, customer service, efficiency and environmental programmes.[9]

[6] Council Directive 89/391/EEC of 12 June 1989 on the introduction of measures to encourage
[7] Energy Saving Trust (2015) A Guide to Managing and Reducing Grey Fleet Mileage http://goo.gl/1zh0H1
[8] RoSPA (2015) Driving for work : Own Vehicles http://goo.gl/1JA4qJ
[9] Murray, W. CARRS-Q, 2002, Evaluating and improving Fleet safety in Australia.

**MANAGING ROAD SAFETY PROVIDES AN OPPORTUNITY TO REDUCE COSTS IN SEVERAL WAYS:**

- Reduced running costs such as fuel consumption and vehicle maintenance through better driving standards;
- Fewer working days lost due to injury;
- Reduced risk of work-related ill health;
- Reduced stress and improved morale/job satisfaction;
- Less need for investigation and paperwork;
- Less time lost to work rescheduling;
- Loss of reputation;
- Fewer vehicles off the road for repair;
- Fewer missed orders and business opportunities, reduced risk of losing the goodwill of customers;
- Less chance of key employees being banned from driving.[10]

## 2.3 PROBLEMS OF GREY FLEET OPERATION AND ALTERNATIVE SYSTEMS

Grey fleets cost a significant amount to operate, particularly if they are poorly managed. The Energy Saving Trust has found that a fleet of 500 grey fleet drivers who cover an average of 1,600 kilometres per year in their own vehicle will cost an organisation about €285,000 per year in reimbursements.[11] Some of this expenditure is unavoidable, but a better managed fleet and alternative travel policies could help significantly cut the costs, as well as the risks.[12]

Table showing cost comparisons between alternative modes of transport for a 290-mile round trip between Manchester and Newcastle.

When the costs of grey fleet operations are compared to the alternatives, the differences become quickly apparent. This shows the benefit of a policy that encourages the use of alternative means of transport.[15]

Reimbursement of grey fleet running costs can be complex.[16] Even with detailed journey recording and auditing, any kind of cost reclaiming system, whether for fuel or for all vehicle costs, is open to error and abuse. Additionally, working out a fair rate for an employee's use of their own car is often very difficult, especially bearing in mind the diverse nature of the vehicles that employees tend to own and their widely differing running costs.[17]

Another financial risk associated with grey fleets is where an employee is making a work-related journey and is involved in a collision and found to have either incorrect insurance (for example, that does not include business use) or an invalid licence. The employee is committing an offence and will be prosecuted, but if it is a serious collision, the probability is that any claimants will also look to the organisation as they had the duty to manage the employee.[18]

Financially speaking, the use of grey fleet vehicles is often not the most effective means of transport available. When travelling beyond 160 kilometres, they become far more costly (in terms of cost per kilometers) and have the added potential cost of wasted working hours, for example, when employees spend time in traffic or have been involved in an accident and are temporarily unfit for work.[19]

| Method | Grey fleet at 65 pence per mile[13] | Grey fleet at 45 pence per mile | Train Fare (advance anytime return) *price correct for January 2012 | Hire car (compact five door, e.g. Ford Focus) plus fuel |
|---|---|---|---|---|
| Cost | £189 | £131 | £90 | £67 |
| Saving | - | £58 | £99 | £122 |

(Source: EST[14])

[10] National Highway Traffic Safety Administration, ''What do traffic crashes cost?'' https://goo.gl/lB3dpa
[11] Energy Savings Trust, (2012). A guide to reducing grey fleet mileage. https://goo.gl/f0jH2X
[12] Ibid.
[13] 1 mile = 1.609344 kilometers
[14] Energy Savings Trust, (2012). A guide to reducing grey fleet mileage. https://goo.gl/zYQMFA
[15] Interactive Driving Systems (2012) Grey Fleet Research Report Preferred practice guide for grey fleet risk management
[16] GE Capital (July 2012) Cash Fleet, Grey Fleet) http://goo.gl/R3yi8T
[17] GE Capital (July 2012) Cash Fleet, Grey Fleet) http://goo.gl/R3yi8T
[18] Zurich Insurance (2010) Managing Grey Fleet Risks http://goo.gl/v3gxsQ
[19] Energy Saving Trust (2015) A Guide to Managing and Reducing Grey Fleet Mileage http://goo.gl/1zh0H1

# PART III

## ARE THERE ALTERNATIVES TO ASKING EMPLOYEES TO USE THEIR OWN VEHICLES?

Management policy on the use of grey fleet vehicles should be part of a travel plan that aims to reduce the need to travel at all by using a 'travel hierarchy' (see graphic below). Risk management should be linked to strategies to cut overall business mileage. Company or public authority fleets, or departmental pool cars, locally hired against a contract may be used to replace grey fleet use.

Total business mileage is already under scrutiny and will be cut further by reduced face-to-face contact or replaced by electronic communications.[20] In light of this, the current fleet car provider's role may evolve to a provider of a total personal business mobility mix[21] offering access to different modes and, for example, organising car sharing.

The travel hierarchy below will aid decision making and help minimise travel and its impact.

| | |
|---|---|
|  | **Can the journey be avoided through the use of audio or video conferencing facilities?**<br>If so, these should always be the first option to help remove all carbon dioxide emissions and the bulk of the costs per journey. |
|  | **Can the journey be carried out by foot, bicycle or public transport - rail tube, or bus?**<br>Public transport is often an available option for all journeys between urban centres. It's a safer mode of transport than a car, generally results in lower emissions, and can be more business efficient when taking into account ability to work, road delays, etc. |
|  | **Do you have a lease vehicle available for the journey?**<br>If you have been provided with a less car due to your role or entitlement, this is likely to be the most cost efficient option. |
|  | **Is there a pool car or fleet vehicle available for the journey?**<br>Wherever possible employees are required to use available pool cars (fleet vehicles), as an alternative to claiming business mileage in a private car. By maximising use of fleet vehicles, carbon emissions and costs can be reduced. |
|  | **Will a hire car be cost effective?**<br>For round trips over 70 miles, employees are required to use fleet car or hire car as an alternative to private vehicles. Hire cars provide better value for longer journeys and typically have lower emission levels than private vehicles. |
|  | **Where none of the above options are available, authorised private vehicles may be used for short journeys (round trips under 70 miles)**<br>Employees may only use their own authorised vehicle for journeys under 70 miles, provided that they are able to demonstrate to their line manager that they have discounted all of the above options and have a valid driving licence, full business insurance, up-to-date MOT and service history. |

(Source: Energy Saving Trust (2015) A Guide to Managing and Reducing Grey Fleet Mileage http://goo.gl/1zh0H1)

[20] Cooke, 2002, "Duty of Care and Best Practice Cars on Business University of Buckingham"
[21] See the Business Mobility Decision Tree PRAISE Thematic Report on Safer Commuting. https://goo.gl/uVo7W6

This hierarchy can be part of a travel plan which offers practical measures to reduce the cost and environmental impact of work-related travel by giving staff realistic and cost-effective alternatives to their car.[22] Travel plans promote flexible and sustainable transport solutions, such as car share schemes, working from home and cycle facilities, and can be tailored to specific business needs. A travel plan is about encouraging people to use cars more wisely and offering them better alternatives. Travel plans should also encourage safe and fuel efficient modes of transport. Less travelling means lower fuel costs, lower fleet risks and fewer operational costs.[23]

One example of an organisation that has eradicated the use of grey fleet is Transport for London. Instead, public transport travel passes are issued to all staff. This may not, however, always be possible or feasible for all organisations.

If the travel planning process described above shows that car use is still the only option, then there are different options depending on the distances employees need to travel.

- Companies with employees who drive short distances on a limited basis could consider setting up a car pool. Having vehicles that can be used on an "as needed" basis for occasional journeys may make perfect sense.
- Employers with slightly higher mileage could consider the hire car option. This can make good sense and imply a similar cost to reimbursing an employee using their own vehicle (see the example above).
- Employers who require longer distances to be travelled by their employees should seriously consider introducing a company car fleet as reimbursement costs will be increased.

Another way organisations can reduce the use of grey fleet vehicles is by lowering the distance travelled at which employees are eligible for a company car.

Many employers think that asking employees to use their own vehicles for work is a cheap and easy option. However, as described above, this option can bring a range of cost and managerial issues that could be reduced by using an alternative approach.[24]

**Recommendations for employers:**

- Distance rates and incentive schemes should aim to minimise vehicle use and any schemes that may encourage artificially high vehicle use should be revised in order to reduce unnecessary travel.
- Employers owe the same duty of care to employees who drive their own vehicles for work, so they should consider the legal implications and ensure they have a policy with procedures in place.
- Consider the business benefits of a proactive approach to road risk and grey fleet management compared to a reactive one.
- Assess the potential return on investment for the business, for example reduced downtime, administrative costs, maintenance, repairs and fuel use.

*Travel plans promote flexible and sustainable transport solutions, such as car share schemes, working from home and cycle facilities, and can be tailored to specific business needs.*

[22] Derbyshire County Council (2008) Derbyshire Business Travel Plan Pack.
[23] Murray, W. (2010) Travel/Mobility Planning Interactive Driving Systems.
[24] GE Capital (2012) Cash Fleet, Grey Fleet http://goo.gl/R3yi8T

# PART IV

# MANAGING THE GREY FLEET

Managing grey fleet risks shouldn't be any different to managing company cars or other types of workplace vehicles. The first step is to identify the extent of the grey fleet within the organisation.

## 4.1 RISK ASSESSING YOUR FLEET

Risk assessment is the starting point of any road safety management scheme.[25] As part of any management programme, risk assessing your employees' use of personal vehicles for work should not be a purely box ticking exercise but be used to identify the risk gaps and necessary measures. This is a legal obligation. In accordance with Framework Directive 89/391/EEC, employers shall, taking into account the nature of the activities of the enterprise and/or establishment, evaluate the risks to the safety and health of their workers.

Subsequent to this evaluation one must implement the necessary preventive and protection measures, including any training that may be needed. Overall, it is important for organisations considering driver training to have an effective risk assessment-led process. There is a requirement for compulsory training on safety and health issues (Article 12 of Framework Directive 89/391/EEC). Whatever type and level of training is chosen, it should always be based on a needs analysis.

Typically, risk assessment of personal cars used for work, should ask the following questions:

- What journeys have to be taken?
- Which modes would represent the lowest risk?
- What kinds of vehicles make up the fleet?
- Who are the vehicles driven by?
- Where are they driven?
- What type of drivers do you have?
- How long do they have to drive?
- How long have they been driving? (license check)
- What are they being asked to do, apart from driving?

The risk assessment should identify key performance indicators which should be monitored and evaluated. The driver needs to be checked but so do the vehicle and the work-related journeys taken.

### Targeted risk intervention – high mileage drivers

An example of targeted risk intervention comes from the Zurich Insurance guide[26]. It says that if one of the risk areas identified from the assessment process is an employee's high mileage profile, the risk reduction strategy would be, in this order:

- Eliminate some of the mileage, which is generally a management initiative. As an example, sales territories could be reorganised.
- Substitute some of the journeys for ones on public transport. Air and train travel are both significantly safer than travelling by road.
- Ensure you have robust policies on fatigue management. The biggest risk for high mileage drivers is falling asleep at the wheel, so policies should include limits on the maximum length of the working day (including driving), maximum continuous driving times and break durations (15-20 minute breaks after 2h driving or sooner if feeling tired).
- Raise awareness about fatigue issues and provide practical suggestions on how to manage this.
- Provide guidance and training on effective route planning, to ensure journey times are minimised.
- Provide guidance and training on effective schedule setting to ensure that journeys are planned efficiently.
- Provide guidance and training on how to attain the correct seating position, as incorrect posture will lead to the early onset of fatigue.

[25] ETSC (2010) Fit for Road Safety: From Risk Assessment to Training. https://goo.gl/4vu4NB
[26] Zurich Insurance (2010) Managing Grey Fleet Risks http://goo.gl/v3gxsQ
[27] Grayson, G. B. and Helman, S. (2011). Work related road safety: a systematic review of the literature on the effectiveness of interventions. Research report 11.3. Institute of Occupational Safety and Health.

Risk can be reduced through a reduction in the amount of road use by employees[27]. Steps taken to reduce travel by the riskier road modes such as driving and cycling (for example by using teleconferences or taking public transport where travel is necessary) have the best chance of proving effective at reducing road injuries.[28]

Employers can significantly influence road safety compliance amongst their grey fleet employees. Large employers can also influence policies in Small and Medium Enterprises (SMEs) when they subcontract out work, by insisting that subcontractors adopt the same conditions and standards in relation to driving for work.[29]

Following a driver risk assessment, training should be offered to all those who need to drive for work, regardless of if they are using their own cars or company vehicles.

When it comes to grey fleet, large employers should be encouraged to share good practice with smaller companies who may not have the resources dedicated to human resources found in larger companies.

**Recommendations to employers:**

- In line with the European Framework Directive 89/391/EEC, undertake a risk assessment that includes the driver, journey and vehicle of grey fleet employees.
- Develop measures in direct response to the outcome of the risk assessment.
- Address high risk areas and immediate risks first before moving on to tackle lower risks; all risks should eventually be addressed in order to continually improve.

## 4.2 RESPONSIBILITY, MANAGEMENT AND INTERNAL POLICIES

Because personal vehicles used for work do not belong to the company, fleet managers face a complicated set of issues when it comes to safety management. Responsibility for managing grey fleet road risk must be carried out (just as for company vehicles) from the top management level and be linked in throughout the organisation's management chain.[30] The roles and responsibilities for implementing the policy have to be clear to all involved.

One question that often comes up is whether the responsibility for the issue sits with a dedicated health and safety manager or with the fleet manager. The recommended approach is for responsibility for road safety to be within the operational or executive line within an organisation.

The health and safety function provides the necessary advice and may very well set out the policy, standards and requirements for fleet safety. However, this should be executed through the executive line via accountable operational management.

The dedicated person accountable for the employee's personal fleet safety has to ensure that the subject is included in the organisation's mission statement, and that key performance indicators are in place and included on the agenda at all regular board meetings.[31]

Research has shown that when safety is part of the organisation's management chain, safety awareness improves and injuries are reduced.[32] As well as an engaged leadership, safety culture should be developed throughout the organisation and address all employees, including the ones using their own vehicles for work. Safety culture 'characteristics' include safety policies and procedures issued by senior management, the commitment to implementing safety policy shown by line management and the willingness to comply with safety rules shown by the workforce.[33]

**Recommendations to employers:**

- Take responsibility for managing your grey fleet;
- Adopt a clear policy setting out the organisation's commitment to managing grey fleet use;
- Identify clear roles for implementing this policy;
- Promote a safety culture as an integral part of the policy implementation;
- Include grey fleet use in the Work Related Road Risk (WRRR) programme;

[27] Grayson, G. B. and Helman, S. (2011). Work related road safety: a systematic review of the literature on the effectiveness of interventions. Research report 11.3. Institute of Occupational Safety and Health.
[28] Ibid.
[29] PRAISE Thematic Report 5, Minimising In-vehicle Distraction. https://goo.gl/Ak6JHm
[30] Wallington D, Murray W, Darby P, Raeside R & Ison S. Work-Related Road Safety: Case Study of British Telecommunications (12-1196). Paper presented at the 91st Annual Meeting of the Transportation Research Board, Washington, D.C., January 22-26, 2012.
[31] Ibid.
[32] Zohar 2002 in Newnam et al Occupational driver safety: Conceptualising a leadership based intervention to improve safe driving performance, 2011
[33] ERSO (2007). https://goo.gl/ohUh1i

## 4.3 FOCUS ON DRIVERS

### Prioritising interventions

| Risk Rating | Driving profile |
|---|---|
| **High** | **High mileage** (35K + business kilometres per annum)<br>Drive during the night/early morning<br>Driving is a departure from the norm<br>**High collision history**<br>Those acquiring penalty points<br>Those with poor attitude towards road safety<br>Drivers of unusual vehicles<br>Newly qualified drivers, especially those **17 to 24 years old (young drivers)**<br>Those assessed as high risk from psychometric risk assesment profiling (where used). |
| **Medium** | Drivers who covered around 10k+ business km per annum (in either a company vehicle or their own vehicle) |
| **Low** | Drivers who make work-related journeys on an infrequent basis and/or very low mileage (below 10K kilometres per annum) |

Source: Health and Safety Executive, Ireland

A gap analysis risk assessment should be undertaken to ensure that if drivers use their own vehicles on work business they are also included in the employer's work related road safety policy. The scheme above will help identify where to intervene for driver management based on the driver profile.

The driver has the most influence over whether they are going to be involved in a collision so the emphasis should be placed here. The safety precautions implemented for employees using a company car or leased vehicle should be the same for employees driving their own cars.

Fitness to drive is one of the key areas that need managing, which includes areas such as:

- health;
- fatigue;
- alcohol or drug (medicines and recreational) use;
- risky driving behaviour (speeding, not using seat-belts, distraction).

Employers have a clear responsibility to reduce incentives to speeding and to raise understanding of the serious consequences it can have.[34] Drivers travelling for work are often under pressure to meet tight deadlines and this means that they are more likely to speed. A UK study found that speeding amongst company car drivers was common for over half the sample, and excessive speeding was common for 13% of the sample. The most important reason was the desire to arrive at meetings on time, even if this meant breaking the speed limit. This was combined with a reduced perception of excess speeding as an important collision risk factor and less driving experience.[35] ETSC's report on managing speed in the work-place[36] offers employers a guide for tackling speeding amongst employees driving for work. It also includes a section on management issues covering topics such as journey planning and payment schemes providing advice on how such practices can help to manage speeding in the work context.

Driver distraction should be a source of concern for health and safety managers as it is thought to play a role in 20-30% of all road collisions.[37] Management must apply standards on mobile phone use. Best practice is not to allow any phone use whilst driving. Unilever is an example of a company that has implemented this rule for its employees globally.[38]

Grey fleet drivers should follow the same rules on phone use. This can be more difficult to manage, because a grey fleet employee may also use their own phone and may not see any rules and regulations around phone use as applying to them.

Mileage covered and collision history are certainly indicators of risk, but they may not be as useful when assessing your grey fleet, as those employees tend to cover less mileage and the organisation may lack collision data. A good comprehensive risk assessment will address many other issues and give an accurate indicator of which employees are more likely to be involved in a collision.

### Recommendations to employers:

- Develop measures in direct response to the outcome of risk assessment, considering key risk factors affecting drivers who use their own cars for work.
- Provide adequate training to address the needs and risks of the drivers using their own vehicles.

[34] PRAISE Thematic Report 8 Driving for Work; Managing Speed. http://goo.gl/eC6JgJ
[35] Adams-Guppy, J. and Guppy, A. (1995) Speeding in relation to perceptions of risk, utility and driving style by British company car drivers. Ergonomics, 38, 12, 2525-2535
[36] PRAISE Thematic Report 8 Driving for Work; Managing Speed. http://goo.gl/eC6JgJ
[37] ETSC (2011) Minimising In-vehicle Distraction. http://goo.gl/eC6JgJ
[38] See Unilever website 'Implementing our safety commitments'. https://goo.gl/6e0uTv

## 4.4 THE VEHICLE

The responsibility of employees for their own vehicles needs to be clearly outlined in the company's policy. One area of concern for privately owned vehicles used for work is insurance and servicing policies, whereby vehicles are not covered for company travel. Keeping track of the status of grey fleet vehicles to ensure they meet legal road requirements includes:

- checking driver licence validity;
- checking insurance details, include business use;
- checking roadworthiness certification;
- checking road tax validity.[39]

Organisations also need to ensure the vehicle is suitable for the job that the organisation is asking the employee to do. Where specialist tasks are involved (for example carrying equipment) then it is often easier to recommend the type of vehicle that should be used, in line with a managed fleet vehicle selection policy.

For a concrete example of how an employer communicates with employees on this issue and puts vehicle selection policies in practice see the example in the Annex.

When selecting a vehicle, one of the best starting points is from a health and safety perspective. It is reasonable for an organisation to determine minimum safety specifications for a vehicle to ensure the safety of an employee, and this doesn't need to limit vehicle choice given the wide options that exist on the market.

Ideally, the criteria for being able to use a privately-owned vehicle should be clear and fully aligned with the wider fleet risk management programme. Some organisations are able to manage the grey fleet effectively by covering these issues in contracts of employment as well as the organisation's various policies and procedures.

### Recommendations to employers:

- Develop policies and procedures for the management of employee's own vehicles which are used in the business;
- Include safety criteria for using the vehicle for work purposes, including 5 star Euro NCAP cars and vehicles using in-vehicle safety technologies;[40]
- Work closely with suppliers, equipment manufacturers, insurers and customers to develop tailored and appropriate safety solutions.

## 4.5 THE JOURNEY

The planning and management of journeys plays a central part in reducing work-related road risk. Preventative measures in this area should include drivers using their own vehicles for work and should be developed as part of the broader road safety programme.

The journey also has an influence over whether an employee is likely to be involved in a work-related collision. Any travel plans that developed should include the employees using their own cars.

Fatigue is the biggest issue associated with journeys, so any limits on the total length of the working day, including driving, should include grey fleet drivers. It is common to find, despite their (generally) lower mileage profiles, that these drivers face significant risks in this area. This factor should be covered in the risk assessment discussed earlier in this report.[41]

At the organisational level, managers and human resource staff should work to ensure that current employment contracts, shift patterns and work schedules of employees using their own vehicles for work, do not contribute to driver sleepiness and stress. As a minimum, work patterns and journey schedules must enable drivers to stay within the law. Those responsible for journey planning or scheduling including the transport operators have a responsibility to take all such factors into account. Employers should consider introducing buffer times in the supply chain, so drivers are relieved from time pressure and can concentrate more on safety and energy saving issues.[42]

### Recommendations to employers:

- Ensure that employment contracts, shift patterns and work schedules do not contribute to putting employees under time-management pressures.
- Review scheduling, rostering and route planning arrangements. Proactively address driver stress in the context of a health and safety plan.

[34] PRAISE Thematic Report 8 Driving for Work; Managing Speed. http://goo.gl/eC6JgJ
[35] Adams-Guppy, J. and Guppy, A. (1995) Speeding in relation to perceptions of risk, utility and driving style by British company car drivers. Ergonomics, 38, 12, 2525-2535
[36] PRAISE Thematic Report 8 Driving for Work; Managing Speed. http://goo.gl/eC6JgJ
[37] ETSC (2011) Minimising In-vehicle Distraction. http://goo.gl/eC6JgJ
[38] See Unilever website 'Implementing our safety commitments'. https://goo.gl/6e0uTv
[39] RoSPA (2013) https://goo.gl/WIPr0C
[40] ETSC (2016) How Safe Are New Cars Sold in the EU? An Analysis of the Market Penetration of Euro NCAP-Rated Cars. http://etsc.eu/PINflash30
[41] Zurich Risk Insurance (2016) Managing the risk of Grey Fleet.
[42] ETSC (2010) Managing Speed. https://goo.gl/7R093k

- Provide journey planning capabilities to allow realistic scheduling of trips and appropriate time management.
- In dealing with clients, avoid making any concessions that might adversely affect road safety, such as commitments to deliveries or completion of work packages that set unrealistic time constraints.
- Establish schedules, including those for subcontracting chains, that allow drivers enough time to obey speed limits and avoid peak hours driving. These should be flexible and adaptable to changes such as the weather.

*No matter the mileage, any grey fleet vehicles should be 'fit for the task'.*

### 4.6 INSPECTION, INSURANCE AND MAINTENANCE

No matter the mileage, any grey fleet vehicles should be 'fit for the task'. This means that it should be fully insured (including for business use) serviced and maintained to a high standard.

Employers should specify minimum standards of vehicle safety features, maximum age and ancillary safety requirements. Also, any incident involving a vehicle being driven on company business must be reported and investigated for risk management purposes. ETSC's report on work-related road safety management programmes has a section on how to manage fleet inspections, insurance and maintenance.[43]

You should ensure that processes are put in place for regular inspection and maintenance of all vehicles used for work purposes as it is your responsibility to ensure roadworthiness at all times. As a minimum, maintenance regimes recommended by vehicle manufacturers need to be adhered to and more regular checks by drivers should also be required.

**Recommendations to employers:**

- Make sure adequate maintenance arrangements are put in place.
- Ensure maintenance and repairs are carried out to an acceptable standard.
- Teach drivers how to carry out basic safety checks on their vehicles used for work purposes.

[43] ETSC (2012) Work Related Road Safety Management Programmes. https://goo.gl/bvEL1A

# PART V

## CHECKLIST FOR MANAGING GREY FLEET RISKS

The checklist below will assist organisations in fulfilling legal requirements and at the same time, proactively address grey fleet risks in the workplace.[44]

| | |
|---|---|
| Policy | The organisation has a comprehensively written, signed and dated Safety, Health and Environmental Management policy, which covers work related road safety; outlining employee's responsibilities for the upkeep, roadworthiness and legality of their own vehicle. |
| Vehicle monitoring | There is a system in place to monitor and preserve vehicle paperwork, to ensure vehicles are insured appropriately (business use insurance), possess a valid roadworthiness certificate and that servicing schedules have been respected. |
| Financial and environmental tracking | All grey fleet activities are systematically logged and recorded to account for the overall cost of your fleet as well as its environmental impact. |
| Driver monitoring | There is a system in place to monitor fleet drivers, including grey fleets, assuring the possession of a valid driving licence as well as a signed statement outlining their responsibilities. |
| Training | Sufficient training is provided for all fleet drivers, including drivers using their own vehicle, to ensure they can satisfy and comply with company policy and all relevant legal requirements. |
| Minimum safety requirements | There are minimum safety requirements imposed on all vehicles with a restricted maximum age as well as an obligation for vehicles to have breakdown coverage. |
| Specific risks | Procedures are in place to manage specific areas of risk such as breakdowns, accidents and driving in adverse weather conditions (heavy rain, ice and snow). |
| Transport policy | There is an adequate transport policy in place outlining each possible means of transport for specific journeys, outlining the cost, time and environmental impact of each to enable employees to make informed decisions when travelling for work. |
| Legal compliance | Your organisation can satisfy that all its fleet vehicles, including its fleet of personal vehicles operate within relevant legal, regulatory and corporate requirements. |

[44] Will Murray, eDriving FLEET

# ANNEX

Communicating with the employee is a key and delicate step when introducing measures for risk reduction. Below you can find an example from British Telecom's guide for employees, a manual created to help all drivers reduce their risk while driving on company business.

**BT Example – Why do I need to provide details about my personal vehicle and insurance?**

If you drive your own private vehicle on BT business, BT has a duty of care to manage this, and help protect you. This is in line with the joint Health and Safety Executive and Department for Transport guidance on ''Driving at work''.

The questions about your own vehicle and insurance details are based on the minimum level of information BT is required to hold as part of the risk assessment process for managing its 'grey fleet' drivers.

Increased attention is being focused on drivers using their own vehicle for work journeys by the regulators and professional bodies, which is why BT has now introduced this process in line with industry good practice and compliance requirements. It is particularly relevant because different types and ages of vehicle have different in-built safety, environmental and fuel efficiency standards.

The data is only used to help BT better quantify and manage its exposures, risks and compliance.

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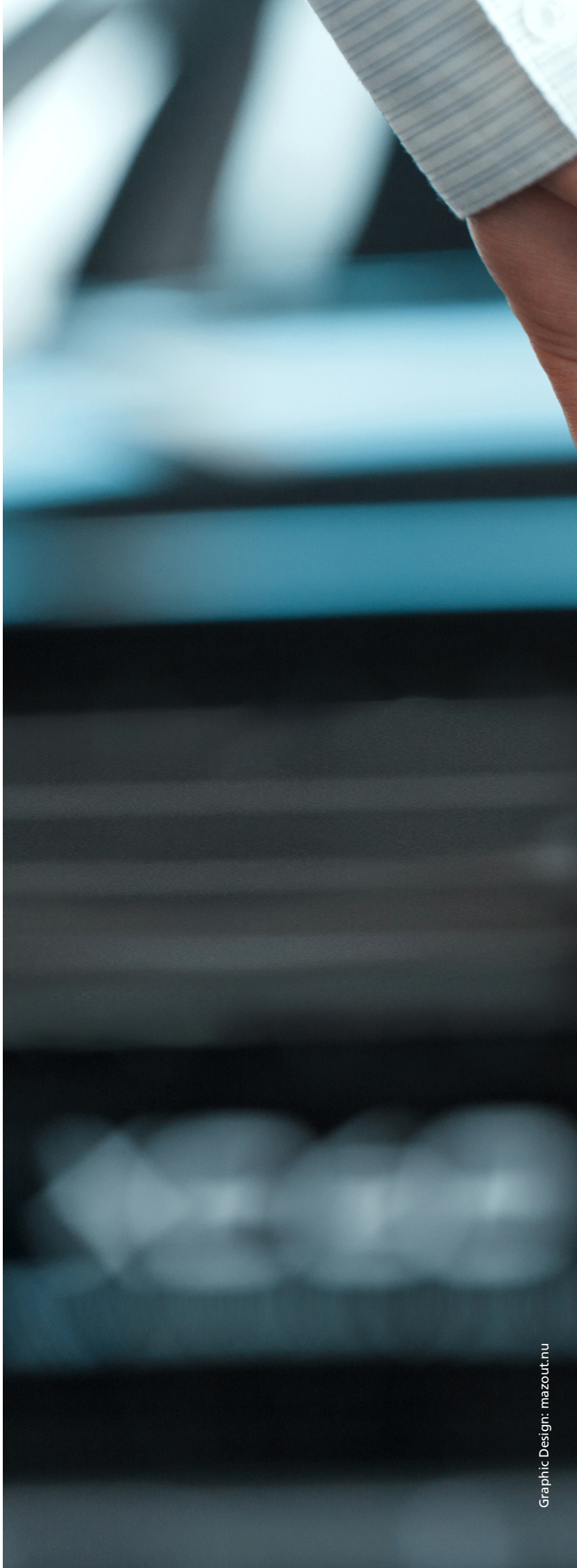

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