

Loss prevention standards

# Managing Driving at Work During COVID-19

Assisting operators in the logistics industry to understand some of the regulatory changes and offer some practical measures that can be implemented in this changing climate across all fleets. Updated 01/06/2020.



# Managing Driving at Work During COVID-19



## Introduction

This document has been produced to assist operators in the logistics industry to understand some of the regulatory changes that have been introduced by UK Government/Driver and Vehicle Standards Agency (DVSA) in response to the COVID-19 outbreak, to highlight some of the additional hazards that need to be considered, and offer some practical measures that can be implemented in this changing climate.

These changes are being referred to by some as ‘a relaxation of the rules’, however, this term is mis-leading, as they are clearly defined and still subject to regulatory enforcement. It is important to ensure that your existing fleet operating procedures are reviewed and revised to not only include the Government-issued changes, but also the additional measures that need to be introduced to manage any risks that may arise as a result, enabling safe and successful operations to be maintained.



## COVID-19 UK Government Changes to Regulatory Framework Relating to Road Transport (Information correct as of 1 June 2020)

### Drivers' Hours

A temporary and limited urgent relaxation of EU and GB drivers' hours rules in England, Scotland and Wales for all sectors of goods carried by road was introduced from the 23 March 2020 and extended to the 31 May 2020. This has been reviewed and the relaxation of EU drivers' hours expired at 23.59hrs on 31 May 2020. The GB domestic drivers' hours rules will continue until 23.59hrs on Sunday 14 June 2020. Any relaxation of the GB drivers' hours rules should only be considered where genuinely necessary and when other supply chain management interventions are unable to alleviate issues, and where the temporary relaxations are designed to support the transport of vital goods, including the supply chains related to medicines, health, fuel, food and other necessities. EU and GB drivers' hours will be kept under review with the possibility of extending or amending the scope of the relaxations, depending on new evidence as circumstances change.

Details on the temporary relaxation of the EU and GB drivers' hours rules can be found [here](#). Previously there were three other temporary relaxations for delivery to retailers, to consumers and for LPG, which have all now been withdrawn.

During these temporary relaxations areas to be considered are:

Additional Risks	Measures to Manage
Operators not aware or adhering to the temporary relaxation of GB drivers' hours	<ul style="list-style-type: none"> <li>• Inform management of the current temporary relaxations to GB hours</li> <li>• Engage and agree with employees and their driver representative on how you intend to implement the temporary relaxation</li> <li>• Do not compromise driver safety (see increased fatigue below)</li> <li>• <b>Monitor the government updates on GB drivers' hours and implement changes immediately</b></li> <li>• <b>Continue to monitor and manage drivers' hours in line with the changes</b></li> <li>• <b>Review internally that any further amendments to GB drivers' hours are being implemented correctly</b></li> <li>• Register for Government updates</li> </ul>
Drivers not aware or adhering to the temporary relaxation of GB drivers' hours	<ul style="list-style-type: none"> <li>• Inform drivers of the current temporary relaxations to GB hours and further updates</li> <li>• Follow emergency practices for noting why exceeding permitted limits:</li> <li>• <b>GB drivers' hours</b> - note on their record sheet</li> <li>• Drivers to advise if additional hours are impacting on their ability to be fit to drive and work safely</li> </ul>
Operators not aware or adhering to the expiration of temporary relaxation of EU drivers' hours	<ul style="list-style-type: none"> <li>• Inform management of the expiration of the temporary relaxations to EU hours</li> <li>• Engage with employees and their driver representative on expiration of the temporary relaxation</li> <li>• Document the changes and measures implemented following expiration of the temporary relaxation of EU drivers' hours</li> <li>• <b>Monitor the Government updates on EU drivers' hours and implement changes immediately</b></li> <li>• Maintain records of the temporary relaxation of EU drivers' hours (23 March 2020 - 31 May 2020)</li> <li>• <b>Review internally that any further amendments to EU drivers' hours are being implemented correctly</b></li> <li>• Register for Government updates</li> </ul>
Increased fatigue	<ul style="list-style-type: none"> <li>• Review current fatigue management measures and communicate to drivers</li> <li>• <b>Managers to assess driver's alertness, fatigue and sufficient sleep had to determine if the driver is fit to drive</b></li> <li>• Closely monitor drivers who have been diagnosed with Sleep Apnoea or other sleep related disorders</li> <li>• Managers to prevent drivers driving if they are not fit to drive</li> </ul>

## Vehicle Inspection Requirements

Changes to the frequency/type of inspections and testing for vehicles:

From 21 March 2020, the DVSA have suspended heavy vehicle testing of all Heavy Goods Vehicles (HGV), trailers and Public Service Vehicles (PSV) for up to three months, again this could change as circumstances change.

## LOSS PREVENTION STANDARDS

Car, vans and motorcycles due their MOT from 30 March 2020 will have their MOT extended by six months.

Companies must ensure these vehicles are maintained in line with manufacturer’s requirements and, remain roadworthy. An unintended consequence of poor maintenance is the charge leasing companies will make for ‘end of life’ repair damage (chips, alloy scuffs, etc.) when the vehicle is returned at the end of the lease period.

To ensure you have the latest information please view:

- [Temporary suspension of MOT testing for Goods Vehicles](#)
- [DVSA Guide to Maintaining Roadworthiness](#)
- [MOT testing for cars, vans and motorcycles due from 30 March 2020](#)

Additional Risks	Measures to Manage
Unroadworthy HGVs and PSVs in use	<ul style="list-style-type: none"> <li>• Continue the maintenance and safety inspections of your vehicles</li> <li>• Maintain completion of driver daily checks and defect reporting</li> <li>• Where practicable, additional vehicle safety checks to be completed by drivers and vehicle technicians</li> <li>• Continue to comply with your Operating Licence agreed inspection timescales</li> <li>• If you need to change inspection timescales inform the Traffic Commissioner</li> <li>• Arrange the MOT before the Certificate of Exemption expires</li> </ul>
Car, Van, Motorbike MOT not completed	<ul style="list-style-type: none"> <li>• MOT lapses: vehicle to be parked off-road or in a garage and SORN applied for before applying for a MOT test</li> <li>• Arrange the MOT in line with the six month extension</li> </ul>
Unaware of ongoing changes	Register for Government and Traffic Commissioner updates

To keep up to date on Government guidance during COVID-19 you can [register here](#).

### How Does the Suspension of Vehicle Testing Impact your Motor Insurance Policy?

Aviva’s policy does not include a specific requirement for an insured vehicle to hold a valid MOT certificate. However; the policy does include a condition that all vehicles must be maintained in a roadworthy condition.

Failure to comply with this could impact the outcome of any claim if the failure to maintain the vehicle was attributable to the loss.

### Driver Certificate of Professional Competence (CPC)

The Department of Transport has implemented temporary changes to professional drivers qualification [requirements](#) as attending training may not be possible.

Drivers whose CPC card expires in the period from 1 March 2020 to 30 September 2020 can continue driving and should carry their expired Driver CPC card, if they have it. The drivers that this measure applies to will be required to comply with Driver CPC rules from 1 October 2020.

To assist business, Jaupt (Joint Approvals Unit for Periodic Training) have approved the delivery of remote training with some training providers via online video platforms. For further information please visit [Jaupt’s website](#).

## Medicals

The Government is making temporary provisions for bus and lorry drivers aged 45 and over to forego the need for a D4 medical in order to renew their driving entitlement. These changes are temporary and will only apply where the licence has not expired before 1 January 2020.

The licence will only be valid for one year instead of five years and the driver will need to submit a completed D4 form when the licence is due for renewal in 12 months. Drivers with health issues will still need to declare these, and those with health issues that prevent them from driving safely will not have their licence renewed. All drivers must ensure they are medically fit to drive.

## Renewing a Driving Licence with a Medical Condition

There are delays in issuing driving licence renewals for drivers with a medical condition. Current guidance is that providing you have a current driving licence and have not been told by your doctor or optician that you should not drive, then you will be able to drive while DVLA is considering your application.

By law, all drivers must meet certain minimum medical standards and drivers must ensure they are medically fit to drive. All drivers must notify the Driver and Vehicle Licensing Agency ([DVLA](#)) of the onset or worsening of a medical condition. See [Government guidance in respect of health conditions and driving](#).

Further guidance from the DVLA with regards to Coronavirus (COVID-19) is available [here](#).

## Temporary Relaxation of Statutory Obligations

In some circumstances, national governments may relax statutory obligations for a short-defined period to help businesses reduce risks of spread of infection during a pandemic. However, you should not assume statutory **obligations have been relaxed unless you have had this confirmed from an authoritative source. It's always best to check with the relevant enforcing authorities.**

Where this is the case you should note on your risk assessments details of the relaxation and its expiry date. Scheduling the date of expiry within future work plans can help you ensure that your business remains fully compliant.

The latest information and advice from the Health and Safety Executive (HSE) in respect of the coronavirus (COVID-19) can be found [here](#) and guidance with regards to carrying out thorough examination and testing of lifting and pressure equipment during the coronavirus outbreak is available [here](#).

## Carriage of Dangerous Goods Training

The validity of ADR driver training certificates that are due to expire between 1 March 2020 and 1 November 2020 will remain valid until 30 November 2020. In addition, this extension also applies to holders of a dangerous goods safety adviser (DGSA) certificate. Further details can be found [here](#).

## Traffic Commissioner Issues Statutory Document in Response to COVID-19

To recognise the challenges faced by the Heavy Goods and Public Service Vehicle industries in the coming months, the Traffic Commissioner seeks to support the sectors through flexible working practices and a proportionate approach. Guidance and advice on matters such as not meeting the required financial standing levels, action to take when a transport manager is unable to work, approach to temporary extensions and attending hearings and the postponement of hearings.

The document can be found [here](#).

To keep abreast of changes from the Traffic Commissioner you can [register for notifications here](#).

## Additional Suggested Measures to Manage other Risks Arising from these Changes and COVID-19

In your business you will have your normal operating procedures for the effective management of driving at work through policies, procedures, driver handbooks, training programmes and communication methods. To assist you during these changing times we have highlighted potential risks for you to consider, as follows:

### Operational Risks

#### Reinstatement of Premises, Buildings and Vehicles

When planning to reinstate or reopen buildings and premises that have been shut down or mothballed on a temporary basis, for example in response to a business downturn or forced closure due to external factors such as an epidemic/pandemic event, whilst it is not possible to provide detailed steps for every type of premises; Aviva have developed guidance which seeks to support general principles that can be applied to the majority of situations and installations.

Such circumstances should be managed using your management of change procedures with a documented reinstatement plan derived and demonstrably followed. Checklists are provided, as an appendix to the Loss Prevention Standards listed below to aid you in the management of any reinstatement you are planning to make:

- [Measures to Reinstate Plant, Equipment and Processes](#)
- [Measures to Manage People and Operations following Reinstatement after a Shutdown](#)
- [Measures to Reinstate Buildings, Premises and the Work Environment](#)

#### Vehicles and Trailers

The condition of vehicles and trailers whether used on or off the public highway is an important consideration, especially if they have been parked-up for a period of time without the ability to move them frequently. Vehicles should be inspected by a competent person and certified as roadworthy.

Tyres could potentially deflate and develop cracks under pressure, brakes can seize, air lines can perish, connectors can become damaged, rodent damage may have occurred whilst in storage, and safety equipment may have been removed. Conducting a thorough service and maintenance of each vehicle and trailer appliance can ensure roadworthiness, safety and reliability when put back into use.

If telematics and/or in-vehicle cameras are installed, complete a health check, e.g. is the fault light lit, to ensure they are in good working order, that updates from the manufacturers are installed, and repairs undertaken where possible before the vehicles are operational. If the vehicle battery is flat, follow the manufacturer recommended procedure rather than just jump start the vehicle as it could cause a voltage surge and blow the unit.

Drivers should complete vehicle checks before the vehicles are used.

#### Hybrid, Plug-in Hybrid and Electric Vehicles

The risk of battery damage to parked-up electric vehicles should be considered. Manufacturers' guidance should be followed to ensure care of the batteries in hybrid, plug-in hybrid or electric vehicles.

## LOSS PREVENTION STANDARDS

## Leadership

An organisation's risk and safety culture are defined by the values, beliefs, knowledge and understanding about risk shared by a group of people with a common purpose. During these continually changing times the actions by management will greatly influence the behaviour and attitudes of the employees.

Companies must maintain a service in alignment with the changes of regulatory requirements, and in order to achieve this it is essential that everyone remains focused to managing risks effectively and ensuring that frequent communication is established.

To achieve this, a gap analysis of your normal operations should be undertaken to implement government and industry guidance in relation to COVID-19, with the aim to reduce the operational risk to the lowest reasonable practicable level by taking preventative measures and safeguarding employees health and wellbeing in line with the UK Government guidance to [working safely during coronavirus \(COVID-19\)](#), and following the five steps to safer working together:

- Complete a COVID-19 risk assessment and share the results with employees
- Take all reasonable steps to help people work from home
- Have cleaning, handwashing and hygiene procedures in line with guidance
- Take all reasonable steps to maintain a 2m distance in the workplace
- Where people cannot be 2m apart, do everything practical to manage transmission risk

Implementing the steps above will help to prevent the transmission risk and comply with the guidance.

Note: For advice from the Devolved Governments in Scotland, Wales and Northern Ireland see Sources and Useful Links section later in this document.

## Engagement and Communication

Good engagement and communication in regards returning to the workplace in the form of advice and support should be given to managers and employees on health, safety and wellbeing including if any adjustments and/or support is required to enable an effective return.

The communications provided will be dependent upon the length of time away from operations, re-familiarisation of work equipment and existing practices, as well as information on COVID-19 and new procedures and processes being implemented which have resulted in any changes to work duties or tasks.

## Mental Health and Wellbeing

Loss of loved ones, anxiety over catching the infection or risk of loss of employment and the additional pressures of **working that maybe experienced during a pandemic can be detrimental to an employee's mental health and wellbeing. It's especially important** that employees feel supported during a crisis of this nature. Encourage employees to be honest about their feelings and where possible put in place mechanisms by which employees can access support services. These do not need to be privately provided wellbeing and mental health services and can be publicly available services provided by the NHS and various charities. Help and sources of support can be found at the following NHS provided website [Every Mind Matters](#) and at the [GOV.UK website](#).

## Social Distancing

It's important that you check and follow UK Government guidance to [working safely during coronavirus \(COVID-19\)](#).

Consider how the objective of maintaining 2m social distancing, wherever possible, can be applied to your workplace. You may need to adjust the working environment, develop/devise new working practices and alter employee working patterns to comply with these guidelines and to create lower risks for employees whilst at work, travelling between sites and on their journeys to and from work.

It will not always be possible to keep a distance of 2m between individuals when inside vehicles. Consideration should be given to whether the activity needs to continue for the business to operate and if it does, implement appropriate control measures to reduce the risk of transmission in line with the government's working safely guidance. One of the steps suggested in this government guidance is in regard to *using physical screening, provided this does not compromise safety, for example, through reducing visibility*. Before installing a physical screen, a risk assessment should be undertaken and below are some areas to consider for different types of screening such as perspex, polycarbonate and plastic dividers. This is not an exhaustive list:

- Driver/passenger safety – the screen should not compromise the safety of the driver, passengers, the vehicle or other road users
- Has the screen had approved impact testing to determine how it would react in a collision?
- How effective is the screen/divider in shielding the vehicle occupants from exposure to COVID-19?
- Driver visibility – is this affected by the screen in variable light conditions, for example with light refractions from strong sunlight, streetlights, night-time vehicle lights, etc., if the surface becomes damaged or scratched, or obstructions placed on the screen etc.?
- In a collision, could the divider be easily removed?
- Has the screen had flame retardant testing to determine how it would react in a fire?
- Installation – is this in line with manufacturer's requirements? Does the installation impact on your vehicle warranty/leasing agreements, would it be classed as a modification?
- Infection control – good hygiene practices of cleaning in line with other contact areas in the vehicle
- Plastic divider –
  - If the driver folds the divider back can it be secured sufficiently?
  - Does folding the divider cause creases which have an impact on the driver's visibility when the divider is returned back into the fixed position?
  - Could the fastenings become loose, resulting in the divider impacting the driver and their control of the vehicle?

Note: For advice from the Devolved Governments in Scotland, Wales and Northern Ireland see Sources and Useful Links section later in this document.

## Hygiene Protocols

Consider the increased risk of infection from contaminated surfaces resulting in absence due to ill-health and reduced operational effectiveness. At site and when on the road, good hygiene protocols must be implemented, be effectively communicated and the application of procedures actively monitored. [Click here](#) for further guidance.

Measures to consider:

### Premises

**Special cleaning materials aren't required, just a simple disinfectant for surfaces, and soap and water, or an alcohol-based sanitiser, for hands:**

- There may be extra cleaning required, but can your existing cleaners do it?
- Are high touch areas regularly cleaned?
- Are staff wiping/cleaning their work area?
- How are wipes/cleaning equipment, etc. disposed of?
- Are work areas being cleaned before and after each user?
- Have you considered how internal meetings will occur, e.g. video/telephone conferencing?
- Have you considered suitable provision of handwashing facilities for staff and visitors – numbers and locations of facilities?
- Do you have protocols for cleaning premises following a suspected or confirmed COVID-19 infection?

### Vehicles

- Are your vehicles cleaned internally and externally before and after use by a driver?
- **Is issued equipment such as mobile phones/EPODs/sat nav's, etc. cleaned before and after issue?**
- There may be extra cleaning required, can this be included on your vehicle checklist?
- Are employees wiping/cleaning the vehicle contact areas such as key/key fobs, door handles, steering wheel, gearstick, mirrors, tachograph units, with antibacterial wipes or bleach free household disinfectant and a cloth?
- **Have you communicated vehicle cleaning protocols to employees and temporary employees?**
- Consider how wipes, etc. are disposed of?
- Do you have protocols for cleaning vehicles following a suspected or confirmed COVID-19 infection?

Driver - drivers not having access to rest and welfare facilities during deliveries:

- Have you provided drivers with alcohol-based hand sanitiser/wipes to maintain good hygiene protocols when soap and water is not available?
- Have you spoken to your delivery sites to ensure provision of social distancing at rest facilities and welfare facilities?
- Do you ask drivers to report any delivery sites which are not enforcing social distancing at rest facilities and access to welfare provision?
- Have procedures been established and communicated to drivers making home deliveries?
- For home appointments/deliveries, such as white goods, have instructions been issued to the customer to inform the supplier if anyone in the household has developed symptoms of COVID-19?

## Personal Protective Equipment (PPE)

During a pandemic, supplies of PPE may have been diverted to support national efforts for infection control. This may mean you are unable to source items of PPE that you normally provide for your workers. If you are unable to source suitable PPE and your risk assessment shows this is necessary for effective risk control, you should explore other options and engineering controls to reduce risk. Be wary of any temporary relaxation of PPE requirements without being able to adequately demonstrate that risks are reduced to an acceptable level by other means. If you are unable to do this, review whether it is appropriate to restart your operations.

The latest guidance can be found at:

- [World Health Organisation Q&A on Coronaviruses](#)
- [PHE COVID-19 cleaning in non-healthcare settings](#)

Note: For advice from the Devolved Governments in Scotland, Wales and Northern Ireland see Sources and Useful Links section later in this document.

## Journey Planning - Routes and Delivery Time Changes

With the temporary relaxation of extended hours and the ability to deliver at night to maintain supply chains, the impact of these on operations and drivers needs to be considered.

Supermarket retailers in addition have the ability to share data with each other on stock levels, cooperate to keep shops open, share distribution depots and delivery vans, as well as pool staff with one another to help meet demand, which can bring additional hazards.

In addition, as more businesses return to work there will be increased traffic on the roads, increasing journey times and potentially driver frustration. People may not use public transport to travel to work but look at alternative means which is likely to result in an increase on the roads of cyclists, the use of electric scooters, mopeds, motorbikes and cars, with possibly people purchasing an older vehicle for commuting. Greater awareness from drivers will be required especially with staggered starting and finishing work times, more vehicles on the road and people having become used to less vehicles on the road so less traffic aware. Provide tool- box talks to drivers on key topics such as focus on driving, reducing distraction, fatigue, etc.

## Deliveries – Vehicles and Goods

Can you use the latest and quietest delivery vehicles and equipment in residential areas?

Is the equipment maintained to minimise noise, for example:

- Kit used for deliveries, e.g. sack barrows?
- Site gates, shutters and delivery doors?
- Vehicle doors?
- Tail lifts?

Review site delivery instructions and local risk assessments if delivering to a site at different times to normal operations, with consideration for the environment, people present and activities taking place.

- Does the site maintain delivery points clear of obstructions with sufficient lighting to assist in manoeuvring the vehicle?
- In respect of night deliveries, does the vehicle have adequate light levels around the vehicle and the site load marshalling areas?
- Is it possible to minimise contact between hard surfaces, particularly metal on metal, during the unloading/loading processes?
- Are doors correctly latched and secured during deliveries?

Before the driver leaves site and is delivering to a site at different times to normal operations, remind them that the environment, people present, and activities will have changed from previous visits and so remain focused.

#### Driver

Provide guidance on minimising noise and light intrusion when entering site, during deliveries and leaving site with consideration to residential areas.

Provision of site delivery assessment instructions to enable safe deliveries, and drivers to carry out a dynamic risk assessment at point of delivery.

Are the drivers adequately trained to carry out the required deliveries, for example, controlled substances or products?

Advise if unable to deliver due to obstructions preventing safe manoeuvring or if no site access, and to contact the Transport Office for advice?

#### Voluntary Work

The number of members of the general public volunteering to assist in the fight against COVID-19 is increasing daily with the largest group volunteering to support the NHS.

Volunteering is classed as where:

- No element of payment or reward, including payment in kind, other than fuel reimbursement at HMRC published rates
- **Tasks directly relate to the provision of 'Good Samaritan' or health and welfare services arising from the outbreak**

Whilst it is not possible to envisage all circumstances, examples would include collecting and delivering shopping to those in isolation or the elderly; patient transfer for medical assistance or medical appointments; a public house delivering free meals to vulnerable people.

The volunteers are fulfilling a range of activities many of which will require them to use a company vehicle or their personally owned vehicle and will require the comfort of knowing whether they are insured.

Company owned vehicles insured by Aviva will be covered, without charge, whilst the vehicle is being used to assist non-profit/volunteering work (including the NHS) during the outbreak by an authorised driver.

If there is any payment or payment in kind this is likely to require a revised certificate to be issued and you should contact your regular Aviva point of contact to discuss further.

Measures to consider:

We suggest you record which Authority your employees are volunteering for as they will act under the direction of the Authority.

Consider whether the change in activity requires notification to any leasing company.

Advise drivers to consider security of the vehicle when carrying any goods or medicines.

If one of your employees is using their personally owned vehicle we would refer you to the advice offered from [The Association of British Insurers](#) which confirms the following:

- *If you work in one of the critical sectors listed by the Government and you need to use your own car to drive to different locations for work purposes because of the impact of COVID-19, your cover will not be affected. You do not need to contact your insurer to update your documents or extend your cover.*

Educational guidance and a list of critical sectors can be found [here](#).

In addition, the advice on [www.abi.org.uk](http://www.abi.org.uk) addresses the question of 'I drive for a voluntary organisation to help people who can't leave their homes; is my insurance still valid?':

- *If you are using your own car for voluntary purposes to transport medicines or groceries to support others who are impacted by COVID-19, your cover will not be affected. You do not need to contact your insurer to update your documents or extend your cover.*

## Operating Outside of Your Core Business Activities

We are aware that a number of fleet operators are being asked to support the UK Grocery sector to ensure goods are available to consumers either in store or delivered to their homes.

Due to the environments that vehicles will be operating in our experience suggests that you are likely to experience an increase in claims frequencies. The reason for this increase relates to the concentration of people and/or vehicles that you will find in supermarket car parks and residential streets. A large number of collisions involve **hitting parked vehicles or stationary objects whilst manoeuvring, and following the Government's instructions for people to stay at home** the hazards have increased as more people working from home means there are more parked cars on our streets, limiting manoeuvring space, and the UK public take their opportunity to exercise once a day with a notable increase in people cycling, jogging or walking and associated risks of vulnerable road users.

If your drivers are not used to operating a van or commercial vehicle in these environments, they must be made aware of the increased risks that they will face on a daily basis, and ways to address this include:

- Share store/distribution centre location risk assessments and safe systems of work including details of entry and exit points
- Share specialist delivery instructions, for example, customers with vulnerabilities
- Remind your drivers of the dangers of distraction driving; see Driver Distraction section below
- Encourage drivers to get out of the vehicle and make a plan before starting the manoeuvre, to check that there are no obstructions and that there is available space to complete each phase of the manoeuvre safely
- Additional risks associated with slow manoeuvres and confined spaces such as cul de sacs and areas where vulnerable road users may be present
- Encourage your drivers to eat regularly and ensure they take drinks to be consumed during their normal break to help alleviate tiredness and fatigue

## Sharing of Site Locations

- Are there clearly defined working areas and pedestrian routes?
- Has there been consultation between all interested parties to ensure safe working practices are maintained?
- Are your hygiene protocols aligned?
- Have emergency procedures been reviewed and communicated to all interested parties?
- Are regular safety meetings planned to monitor the impact and resolve any concerns?

## Sharing of Vehicles

- Are the vehicles suitable for the goods being transported?
- Are the vehicles fit for purpose?
- Can the load and vehicles be adequately secured dependant on the loads carried?
- Are your hygiene protocols aligned?

## Goods in Transit

- Is adequate freight liability cover in place, should third party goods be damaged whilst in your care, custody and control?

## Sharing of Employees

- Are your hygiene protocols aligned?
- Has training, information and instruction been provided to enable safe working?
- Have the drivers been trained/familiarised with unfamiliar vehicles?
- If a workplace accident/near miss occurs have reporting protocols been established?
- If a workplace accident/near miss occurs have first aid protocols been established?

Further information can be found here:

- [Night time deliveries to supermarkets](#)
- [TFL Code of Practice for Quieter Deliveries](#)

## Additional Drivers

To maintain operations and to ensure safe operations, additional employees may be required due to increased working hours, managing change, increased sickness and/or self-isolating or caring for family members. Existing driver recruitment and selection procedures should be followed for engaging employees and agency drivers.

Measures to consider:

- Are driver recruitment and selection procedures being maintained?
- Are checks being undertaken that the procedures are being followed?
- Are new drivers monitored and debriefed upon return to site? This can include, if fitted, a review of the telematics data/camera footage/in-vehicle technology and camera alerts as well as a discussion about the journey, site deliveries, any concerns/queries drivers may have

## Fitness to Drive

### Fatigue

Employees from across the business including warehouse, transport office and drivers will want to assist in maintaining the operations and will pull together at this time. This can involve working different shifts, for longer periods, undertaking more physical and mental work than previously as well as potentially having less rest, less downtime at home and a reduced quality of sleep, all of which over time can impair performance which could lead to accidents and/or Road Traffic Collisions (RTC).

In the UK driver fatigue and sleepiness is estimated to account for around one fifth of accidents on major roads per year. Research shows that the maximum sleep related accident level occurs between 02.00-05.00hrs and a lower peak at 15.00–16.00hrs (Horne and Rayner, 1995). In 2017 UK Police statistics show fatigue was recorded as a contributory factor in 4% of fatal accidents and 2% of serious injury accidents (Reported Road Casualties in Great Britain RAS50001, DfT, 2017).

What is the difference between fatigue and sleepiness?

- Fatigue is the gradual and cumulative process associated with a loss of efficiency and a reluctance for any kind of effort
- Sleepiness is the likelihood of falling asleep and difficulty in remaining awake

In addition to your fatigue procedures, be vigilant for changes in your employees. These can include:

- Responses slower - could be exhibited through increased harsher braking as the driver is slower to respond to the traffic conditions?
- Reverting to previous habits?
- Forgetting steps in a process?
- Short term memory inaccuracies?
- Reduced attention/focus?

Exhibiting any of the following changes:

- Quieter than usual?
- Withdrawn?
- Reduced energy?
- Lacking motivation?
- Mood changes?
- Not communicating effectively?
- Reduced manual dexterity?

Measures to consider:

Check your driver's wellbeing upon arrival at site to ensure that they are fit to drive, and consider the following:

- Are they alert, following instructions?
- Have they had sufficient sleep?
- Are they taking sufficient food and drink on board to maintain energy levels?
- Are the family/friends well?
- If managers/supervisors identify the driver is not fit for duty can they stop them from driving?
- Do you review shift patterns and rest breaks to prevent individuals working excessive hours in any shift?

Monitor immediate impact on the workforce and implement ongoing monitoring throughout the period when changes are taking place due to COVID-19.

## Drugs and Alcohol

Over 300 people are killed and over 2000 seriously injured in drink and drug driving crashes annually. As drivers undertake safety critical work, continue to follow your Drug and Alcohol policy, procedures and testing. During periods of adverse pressure at work and/or life, people can use/consume drugs and alcohol as a coping mechanism.

During periods of adverse pressure at work and/or life, people can use/consume drugs and alcohol as a coping mechanism. This has been seen during COVID-19, with some UK police forces having seen [record drug driving arrests in April 2020](#).

Measures to consider:

Remind employees of your Drug and Alcohol policy and any support which may be available such as an Employee Assistance Programme (EAP).

- Remind managers of the signs to look for of potential drug use and/or alcohol consumption and that these are similar to signs exhibited for stress and/or fatigue

Testing procedures during COVID-19

- Review your testing procedures to maintain infection control and good hygiene practices for the screener and the employee
- Before commencing testing, ask the employee if they have recently experienced a high temperature, a new continuous cough or loss or change to their sense of smell or taste
- If hand sanitiser containing alcohol is being used anywhere in the room, prior to conducting the breath **test, make sure to conduct a 'passive test'**, to check the atmosphere is alcohol free and that any alcohol that may have been on the screener's hands no longer has any effect
- Contact your provider for further guidance on safe methods of testing

## Driver Distraction

During COVID-19 people have used mobile phones and other technology to remain in contact with family and friends and are likely to have become accustomed to using these devices on a more frequent basis. On returning to work and driving, the dangers of distraction when using a mobile phone and other technology as well as your mobile phone procedures should be reiterated.

When a driver's attention is diverted from activities critical for safe driving towards another activity, they are distracted, which could result in loss of control of the vehicle leading to RTCs. Your procedures, training and driver handbook will have provided drivers with information on the cause and effects of distraction whilst driving.

Technology can be an asset in identifying distracted driving events, such as telematics' data and camera footage showing changes in driving style, near misses, minor collisions or worse. Proactive use of the data will assist in identifying 'at risk drivers' and enabling measures to be introduced.

Measures to consider:

- Have you provided information and instruction to your drivers on the following:
  - The dangers of distraction?
  - How to identify when they are becoming distracted?
  - How to manage and avoid becoming distracted whilst driving?
- Do your driver debriefs include a review with the driver telematics data, camera footage, event notifications?
- After completion of the vehicle check do you ask your drivers to complete a check on themselves?
  - Complete calls, texts, emails and viewing social media and then turn mobile off or place on silent?
  - Set the sat nav?
  - Eat a snack/meal and have a drink?
  - Are you fit to drive?
  - Stow loose kit securely?
- Have you advised drivers that if they feel their mind wandering during driving to stop at the next services, take a break and refocus before commencing driving?
- **Do you encourage and monitor driver's improving their hazard anticipation and undertake good scanning techniques of the driving environment?**
- Do you discuss driver coping strategies, for example, following a journey do you ask your drivers to reflect on the challenges faced, how they dealt with them, what worked well or not, so that when a similar situation occurs on their next journey they can use new coping strategies?
- Brake (the road safety charity) have an online interactive driver distraction training tool which is available for their Global Fleet Champions. Register using the links below and you will be able to access additional resources:
  - [Global Fleet Champions Registration/Login](#)
  - [Global Fleet Champions interactive distraction game for drivers](#)

## Childcare and Children Travelling in Commercial Vehicles

The Department for Education has published [educational guidance and information on Key Workers](#) whose children will be prioritised for schooling during general closures because of COVID-19. Schools are being asked to continue to provide care for a number of children but will be closed to the majority from Monday 23 March 2020. As set out in the guidance, local authorities are managing this process and are each implementing their own rules. Employees should contact them to find out what their requirements are. Your local authority details can be found [here](#).

If the organisation is considering providing childcare in the workplace guidance can be found in the Aviva Loss Prevention Standard [Tips for Allowing Children into the Workplace when Schools are Shut](#).

Measures to consider:

- If employees are having childcare concerns advise them to speak to their manager
- Issue key workers with a letter to support their application for schooling
- Remind drivers that there has been no change to children being allowed to travel in commercial vehicles or plant items, or any other mechanical equipment

## Road Traffic Collision Investigation

Continue to promptly report RTCs to your insurer and complete investigations. The investigation should address, where applicable, the potential impact of new working methods.

Measures to consider:

- Include additional fatigue questions
- Establish the underlying and root causes and feed these into the Transport Office and Health & Safety team as soon as possible for analysis
- Analyse the causes before and after the operating practices changed due to COVID-19, to establish if there **has been a direct effect of operational changes. For example, due to the relaxation and adoption of drivers' hours and working different shift patterns, to facilitate changes to be made to reduce the likelihood of further similar or worse RTCs occurring**
- Share findings with Senior Management on a regular basis to enable appropriate decision making

## Fraudulent Claims

There is the potential for an increase in fraudulent claims relating to staged road traffic collisions.

Measures to consider:

- Remind drivers of fraudulent hotspots on their routes?
- Include in driver communications details of the different types of staged collisions?

## Reduced Operation Due to Reduced Demand

### Closure of Site(s) or Vehicles Off Road

Buildings may become unoccupied or operate with a reduced staff, and this increases the risk of losses to your business. If your premises are running on reduced staffing levels due to a pandemic, letting your insurers know, and keeping them informed of any developments is essential.

There are some considerations that businesses should keep in mind to protect their assets, people and business, and these are listed below and in the Aviva Loss Prevention Standard [Pandemic Planning and the Coronavirus:](#)

- Remove keys from vehicles
- Store keys in a secure location with methods to prevent relay attacks
- Park vehicles to prevent theft of vehicles and/or parts
- Relocate vehicles if the premises are on a flood plain
- Drain all water and fuel supply tanks, apparatus and pipes
- All external areas must be clear of waste and combustible materials

## Parked/Stored Vehicles Accumulation Risk

During COVID-19 there may be the need for a larger number of vehicles to be parked or stored together in one place for a prolonged period. This could result in a larger than normal accumulation of vehicles which could lead to the increased risk of vandalism, theft, fire, flood or other single impact event.

During this period vehicles should be:

- Locked
- Parked as far away from buildings and combustible materials (e.g. pallets, etc.) as possible
  - Consider if any exposing buildings or materials caught fire could this spread to the vehicles, and vice versa
- Parked with sufficient space between them to prevent the spread of fire
  - If this is not possible then consider small clusters of vehicles with appropriate aisles and roadways
  - Consider the number and value of the vehicle clusters

If vehicles are to be parked inside a building, then the keys should still be removed and returned and stored in an appropriately secure location(s).

Unless there is risk to life, it is unlikely that the Fire and Rescue Service will remove any vehicles from a burning building.

If the vehicle has a battery isolation switch, then this should be turned off to remove the risk of an electrical fault causing a fire.

Finally, consideration should be given to the natural catastrophe exposures of storing vehicles together in a single location.

Measures to consider:

- Consider the implications of having all the keys in the same location or secure area
  - What is the total number or value of vehicles exposed with the keys stored in a single location?
  - Should the number or value of the vehicles drive multiple secure locations for the keys?
  - Is the secure location/safe fire resistant?
  - **If a safe is used is it rated considering the 'value' of the vehicles?**
    - A simple key safe is not considered appropriate
- Have your security measures been reviewed?

## Checklist

A generic Managing Driving at Work During COVID-19 checklist is presented in Appendix 1 which can be tailored to your own organisation.

## Specialist Partner Solutions

Aviva Risk Management Solutions can offer access to a wide range of risk management products and services via our network of Specialist Partners who are reputable companies offering agreed discounted rates for Aviva customers.

For more information please visit: [Aviva Risk Management Solutions – Specialist Partners.](#)

## Sources and Useful Links

- [Government guidance working safely during Covid-19](#)

For advice from the Devolved Governments in Scotland, Wales and Northern Ireland please refer to:

- [Coronavirus in Scotland](#) – Scottish Government
- [Coronavirus \(COVID-19\)](#) – Welsh Government
- [Coronavirus Covid-19 NI Direct - Northern Ireland Government](#)

Resources available please refer to:

- [COVID-19 – Good Practice Guide for Logistics Operations](#) – Freight Transport Association
- [Register for DVLA alerts](#)
- [Goods Vehicle Operator Licensing Guide](#)

For advice from the Health & Safety Executive (HSE) please refer to:

- [Covid-19 - Health & Safety Executive \(HSE\)](#)

Resources for help promote good hand hygiene practices can be found at:

- [How to wash your hands](#) – NHS
- [Correct removal of gloves](#) - HSE

## Additional Information

Relevant Aviva Loss Prevention Standards include:

- [Vehicle Security](#)
- [Risk Assessment During Rapid Change Events](#)
- [Measures to Reinstate Plant, Equipment and Processes](#)
- [Measures to Manage People and Operations following Reinstatement after a Shutdown](#)
- [Measures to Reinstate Buildings, Premises and the Work Environment](#)

To find out more, please visit [Aviva Risk Management Solutions](#) or speak to one of our advisors.

Email us at [riskadvice@aviva.com](mailto:riskadvice@aviva.com) or call 0345 366 6666.\*

\*Calls may be recorded and/or monitored for our joint protection.

# Appendix 1 – Managing Driving at Work During COVID-19 Checklist



Location	
Date	
Completed by (name and signature)	

	Driving at Work During COVID-19	Y/N	Comments
1.	Have current driving at work normal operating procedures been reviewed and mitigating measures implemented in light of regulatory changes and government working safely guidance due to COVID-19?		
2.	Have communication channels been established to maintain sharing of changes and establishing connections with employees?		
3.	Have procedures been established to implement the changes to EU and GB drivers' hours?		
4.	Has the maintenance and safety inspections of your HGVs, vans and cars been completed to ensure they are roadworthy before being brought back into use?		
5.	In respect of electric, hybrid and plug-in hybrid vehicles , has manufacturer's guidance on maintaining batteries been issued and followed?		
6.	Are arrangements in place to monitor when the MOTs need to be completed before the Certificate of Exemption expires?		

	Driving at Work During COVID-19 Contd.	Y/N	Comments
7.	Do you continue to comply with your Operating Licence agreed inspection timescales?		
8.	If you need to change inspection timescales have you informed the Traffic Commissioner?		
9.	Have drivers and their representatives been consulted on the working amendments due to the changes to EU and GB drivers' hours?		
10.	Have you registered to Government COVID-19 sites and the Traffic Commissioner to receive updates?		
11.	Have driver recruitment and selection procedures been maintained?		
12.	Has Driver CPC been placed on hold until 1 October 2020? If yes, are arrangements in place to complete Driver CPC training?		
13.	Have you got arrangements in place for monitoring the completion of driver medicals renewal in 12 months?		
14.	Have premises and vehicle statutory inspections such as LOLER and PSSR have been completed?		
15.	Has social distancing and shielding being implemented in: <ul style="list-style-type: none"> <li>• The workplace?</li> <li>• The entrance and exit of the workplace?</li> <li>• Supply chain sites?</li> <li>• Customer sites?</li> <li>• Vehicles?</li> </ul>		
16.	Have hygiene protocols been established and communicated for: <ul style="list-style-type: none"> <li>• Premises?</li> <li>• Supply chain sites?</li> <li>• Customer sites?</li> <li>• Drivers?</li> <li>• Vehicles?</li> </ul>		

	Driving at Work During COVID-19 Contd.	Y/N	Comments
17.	Have delivery procedures and site delivery assessments been reviewed to accommodate: <ul style="list-style-type: none"> <li>• Change of routes?</li> <li>• Sharing of sites?</li> <li>• Sharing of vehicles?</li> <li>• Sharing of employees?</li> <li>• Voluntary work?</li> <li>• Different delivery times?</li> <li>• Provision of sufficient lighting levels?</li> <li>• Working with different types of loads?</li> <li>• Working with customers with vulnerabilities?</li> <li>• Working with consideration to residential areas?</li> <li>• Completing slow manoeuvres safely in confined areas such as cul de sacs and the presence of vulnerable road users?</li> <li>• Increased traffic, cyclists, electric scooters, etc. on the roads after lockdown?</li> </ul>		
18.	Have staff been made aware about the signs of fatigue and tiredness and how to manage them?		
19.	Have staff been made aware of the Drug and Alcohol policy, testing and support available?		
20.	Have you reviewed you drug and alcohol screening process?		
21.	Has Driver Distraction been discussed in regards: <ul style="list-style-type: none"> <li>• The causes and effects of driver distraction?</li> <li>• Hazard anticipation?</li> <li>• Undertaking good scanning techniques?</li> <li>• Coping strategies?</li> </ul>		
22.	Are RTC underlying and root causes identified and reviewed to establish impact of operational and COVID-19 changes?		
23.	Has the accumulation risk been considered and quantified for occasions where there is a larger than normal number of vehicles?		

	Driving at Work During COVID-19 Contd.	Y/N	Comments
24.	Has the new accumulation been notified to your broker and/or insurer?		
25.	Have the security implications of having a larger number than normal vehicles housed together been assessed? Are additional remedial measures needed or planned?		
26.	Have the fire risk assessments been reviewed in light of having a larger number than normal vehicles housed together?		
27.	Is an additional physical security presence required: <ul style="list-style-type: none"> <li>• Full time, or for a short or temporary basis?</li> <li>• Roving both day and night?</li> </ul> Are informal visits required by site personnel or management to supplement this?		
28.	Are the vehicle keys housed or stored in a detached or remote secure location, appropriately arranged for the value or number of the vehicles?		
29.	Vehicle storage: <ul style="list-style-type: none"> <li>• Are the vehicles stored as far away from buildings and combustible materials as possible? Ideally this should be at least 10m?</li> <li>• Are the vehicles stored in groups with appropriate aisleways or breaks to minimise fire spread and assist firefighting?</li> <li>• Is the area used to store vehicles considered to be vulnerable to flooding?</li> </ul> Is the removal of the vehicles to a less exposed location considered as part of any flood response plan?		
30.	Additional comments:		

## Please Note

This document contains general information and guidance only and may be superseded and/or subject to amendment without further notice. Aviva has no liability to any third parties arising out of ARMS' communications whatsoever (including Loss Prevention Standards), and nor shall any third party rely on them. Other than liability which cannot be excluded by law, Aviva shall not be liable to any person for any indirect, special, consequential or other losses or damages of whatsoever kind arising out of access to, or use of, or reliance on anything contained in ARMS' communications. The document may not cover every risk, exposure or hazard that may arise and Aviva recommend that you obtain specific advice relevant to the circumstances.

04/06/20 V1.3

Aviva Insurance Limited, Registered in Scotland Number 2116. Registered Office: Pitheavlis, Perth PH2 0NH.  
Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

## LOSS PREVENTION STANDARDS