

Case Study One



BACKGROUND

BNFL is a large organisation, employing 20,000 personnel, approximately 10,000 of which are based at the Sellafield site in Cumbria, with further sites across England. The organisation has many activities, including: fuel manufacture, fuel re-processing and electricity generation.

NATURE OF OPERATION AND DRIVING ACTIVITIES

The majority of the driving activities consist of employees (professional staff / mechanical engineers / safety staff) using hire cars to drive between BNFL sites, e.g. Sellafield and Risley, or to meet contractors. The Sellafield site is estimated to make 10, 500 hire car journeys a year, covering 2.5 million miles. These car hire journeys involve hundreds of employees. There are approximately 100 company cars.

THE POLICY

Why the policy was developed

The Area Safety Manager was aware of the legal responsibilities to employees who drive and was looking to implement a safe driving policy in accordance with good health and safety practice. The development of the policy was then instigated in response to reading an article from RoSPA on 'Managing Occupational Road Risk', which highlighted the risks associated with work-related driving and offered methods for managing driving safety.

Who developed the policy

The policy was led by the Area Safety Manager who set up a group meeting in 1998, to draft out a policy. This group included some drivers, safety staff, and the company medical officer, who were involved in the development and review of the policy and procedures. The policy they drafted out was then added to the main BNFL policy in 1999. The Senior Managers were not involved in the details of developing the policy, but they supported the policy produced by the Health and Safety department.

What the policy covers

BNFL has a main, company-wide, 'Driving on Company Business' policy and then the Sellafield site has its own, more specific, Industrial Safety Regulation 'Off site road transport safety' policy, as well as an Industrial Safety Guidance Note 'Off site road transport safety guidelines'. These latter two documents cover the Sellafield, Drigg, Lillyhall and Chapelcross sites.

The BNFL 'Driving on Company Business' policy covers the following issues:

- Objectives
- Performance standards
- Organising
- Planning and implementing
- Measuring performance
- Auditing and reviewing performance and improving
- Issues which must be taken into account when considering the need to drive on Company business
- Avoidance of travel
- Alternative mode of travel
- Route and travelling time
- Weather conditions
- Vehicles
- Driving abroad
- Emergency equipment
- Health
- Further advice (i.e. where this can be found)

A full copy of 'Driving on Company business' is provided in attachment 1.

The Sellafield Industrial Safety Regulation 'Off site road transport safety' policy covers the following issues:

- Objective
- Requirement (Statutory and Corporate)
- Scope
- Definitions
- Training
- Responsibilities

The Sellafield Industrial Safety Guidance Note, 'Off site road transport safety guidelines' covers the following issues:

- Purpose
- Introduction
- Background
- Benefits
- Legal aspects
- Control measures (eliminating unnecessary vehicle movements, changing mode of travel, avoid driving in adverse conditions, reducing distances, controlling driver hours, optimising schedules, specifying safest routes, specifying appropriate vehicles, selecting appropriate drivers, use of telephones, clear policy on alcohol and other substances).

How the policy is communicated and implemented

The policy was initially communicated to employees via briefings, with employees being informed down the organisational structure from their immediate supervisor, and so on. Safety documents and procedures are usually e-mailed to all staff. The driving safety procedures are also sometimes advertised in the BNFL company paper.

ROAD SAFETY PROCEDURES

The following procedures are included in the policy:

Risk assessment	Everyone is issued with a Risk Assessment Form, providing them with information concerning the hazards and the precautions to be taken by them to avoid injury. Additionally, employees have to fill in a Risk Assessment checklist each time they book a hire car for work (see specific examples below for more details).
Driver training	Training is provided for every driver doing more than 2000 miles a year, under the Sellafield policy. The overall BNFL policy is to provide training for all those employees doing greater than 5000 miles. Employees are sent on defensive driving courses with periodic refresher training (see specific examples below for more details).
Driver assessments	Employees are taken out on the road, on a 45min – 1 hour assessment. They are then recommended for an amount of training, the length of which depends on their driving skills. There is a requirement on line managers to check employees' driver licences.
Alternative means of transport	Employees are instructed to consider whether each journey is necessary and if other means of transport are a practical alternative. The Risk Assessment checklist completed before each hire car is booked is in place to make sure that unnecessary journeys are eliminated. Employees are instructed to consider whether alternatives such as video conferencing, telephone, fax and e-mail are feasible.
Guidance on mobile phone use/hands free sets etc.	Use of mobile telephones is covered in the 'Industrial Safety Guidance Note'. Use of mobiles is prohibited whilst driving on company business. Employees travelling on business are issued with a mobile for emergency purposes, but these should be switched off whilst driving. The use of hands free kits is discouraged, as it is considered that this still presents some risk.
Vehicle maintenance procedures	The frequency of maintenance checks depends on the type of vehicle. Hire car maintenance should be done by the dealers, but the hire car also comes with a check sheet for the employee to use. The defensive driver training course makes drivers more aware of the maintenance checks that need to be done. Large Goods Vehicles and vans are maintained by the transport department.
Journey scheduling	Employees are usually driving the same routes (between sites), so are familiar with the route. However, employees do plan out their route when travelling somewhere new. Employees are encouraged to share cars where possible, and there are often 3 people in a car when travelling between sites. Probably about half of the journeys made by the company involve employees travelling in pairs.
Breakdown guidance / assistance	Drivers are given a telephone number to ring should they breakdown or need assistance in changing a wheel etc.
Incident report	There is a site system and a hire car dealership system for reporting traffic incidents. The site system is that employees report accidents to their line manager, and a form has to be filled in, detailing when and what happened. A full investigation may be recommended, but that would depend on the incident. (See specific examples below for more details).

SPECIFIC EXAMPLES OF PROCEDURES

Risk Assessment

The Risk Assessment Form is provided to all employees, giving them information on various driving hazards and ways in which to minimise these risks. This has only been in place a few months but is believed to have raised morale and increased awareness of the risks associated with driving.

Additionally, each time an employee books a hire car for company business, they have to go through a Risk Assessment Checklist with their line manager, in order to ascertain whether or not the journey is necessary. This checklist includes checks for: considerations of other options instead of driving (e.g. videoconferencing); whether or not the driver has undergone or needs defensive driver training; whether schedules have been chosen to allow sufficient breaks whilst driving; whether employees have been reminded of the mobile phone policy and vehicle maintenance checks etc.

The Risk Assessment Form and checklist has improved drivers' basic understanding and makes them more aware of the risks. The checklist encourages appropriate preparation for the journey, promotes video-conferencing, encourages shared driving, and instructs employees to avoid driving if they can. Employees driving vans and company cars do not have a checklist to go through, but are provided with the Risk Assessment Form.

Driver Training

The main BNFL policy states that driver training should be made available to all employees who drive more than 5000 miles a year on company business. The Sellafeld site policy, however, offers driver training to all those employees who drive more than 2000 miles per annum on company business. The level of risk is quantified through a formula considering the number of miles driven and the associated risk criteria.

The driver training was initially given to the staff responsible for implementing it, and then the company went through the employees to see how many did more than 2000 miles a year. These employees were then sent on the course. The training is still on-going however, as it will take a while to make sure everyone who needs the training has received it. Additionally, drivers are sent on periodic refresher courses, approximately every 2 years, to keep their driving skills up to scratch. Employees undergo a 45 minute to 1 hour assessment to observe their driving skills and ascertain whether they will need 1 or 2 days training.

Employees agreed that the driver training was worthwhile as it instilled in them good driver techniques, reinforced the highway code, and generally improved their driving and awareness. The only suggestion for improvement was that the driver training had taken place on motorways around Cumbria and employees argued that motorway driving, e.g. around Manchester, is quite different and more stressful. They argued that they would benefit more from driver training on motorways which were further afield.

Incident Reporting

The method of incident reporting is that the driver reports actual incidents and 'near misses' to his/her line manager, and a form is filled in which details when and what happened. A full investigation may be recommended, depending on the particular incident. A recent breakdown incident highlighted a problem with the assistance given from a hire car company, and so this is now under review. Employees report significant near misses, and these incidents are screened (company-wide) so that they can be learned from. Any recommendations stemming from any particular incident are publicised and shared with other sites and employees are appropriately briefed.

COSTS AND BENEFITS

The overall costs of developing and implementing the road safety programme are seen to be the cost of employee time spent and the costs incurred by the driver training course. However, the benefits of the driver training appear to be improved awareness, increased morale and an appreciation by the employees that the training is indeed worthwhile. Employees have additionally experienced improved personal driving, due to a “knock-on effect” of the training. Employees are generally more aware of the risks associated with driving and so discuss these issues more frequently than before.

It is difficult to quantify the impact of the implemented safety procedures on the accident statistics, as the number of miles driven by employees per year goes up and down (and is not recorded), and the incident reporting procedure is not explicitly defined within the safety policy (although employees stated that they thought the majority of drivers do report ‘near misses’, as well as actual incidents). Driver training is also still running, so the improvements are still on-going. The target to reduce the overall number of miles has not really been achieved, although there is a perception, however, that the benefits have generally increased.

LESSONS LEARNED

The Area Safety Manager suggested that, when contemplating the introduction of a work-related safe driving scheme, it is important to know the facts, such as the number of deaths and accidents per year on roads and the number of miles driven per year, by the company. Sellafield does not record the number of miles that each employee drives per year, but a quantification of the number of miles would be helpful. Aspects which were useful, when drafting the policy and implementing the scheme, was the consultation with those employees who did the driving. Examples of other companies with safe driving schemes were useful when starting from scratch.

The overall main barriers to implementing the scheme were dealing with the perceptions that it is a risky area and one cannot do much about improving driving. However, people need to be informed of the legal responsibility and the duty to staff, as well as the costs associated with work-related driving accidents and possible benefits. Consultation with senior managers earlier on in the process may have facilitated its implementation, once they were made aware of the aforementioned factors.

Employees suggested that more defined guidance for refresher training would be helpful and also recommended that a company-wide option to carry on and complete Advanced Driver Training would improve employees’ driving skills even more so and would be an appealing choice.

CURRENT AND FUTURE DEVELOPMENTS

There are no immediate plans to change the content of the existing schemes, but the responsibilities are to be more explicitly defined. The Area Safety Manager is currently looking at the section of the policy on breakdown and assistance, due to a recent delay in the time it took to respond to a lone female driver on a busy motorway.

The driver training is still running as not all employees driving more than 2000 miles per year have received the appropriate training, due to restrictions of time. Benefits to the company and its employees should therefore keep on materialising as employees continue to be trained. Eventually it will be the policy that employees are assessed and sent on driver training on recruitment, but the company has a backlog to get through first. Refresher training will also continue to be implemented and drivers will be periodically assessed and appropriately revised.

BNFL Attachment 1

L BNFL (UK) Additional Requirements L22 Driving on Company Business

Scope of application	Not applicable to transport workers and heavy goods vehicle drivers. Applies to agency staff but not to contractors.
----------------------	--

Objectives

- To ensure the consideration and control of the risks involved in driving on Company business.

Performance Standards

- In considering the need to drive on Company business, a risk assessment must be made, taking into account the issues listed in Annex 1.
- All hire and lease vehicles must be suitable for their intended use when properly used. Contractual arrangements must specify the minimum safety equipment to be fitted to hire and lease cars and must ensure that they are maintained in a roadworthy condition.
- On-road refresher training to reinforce safe driving practices and suggest improvements where necessary must be made available to all employees driving more than 5000 miles per year on Company business.
- The use of hand held mobile telephones is prohibited whilst driving on Company business.

Organising

- The accountabilities for ensuring adequate arrangements are in place on each UK site to meet UKEHSM requirements, and for effective compliance with them, are defined in reference 1.

Planning and Implementing

- Annex 1 sets out the issues which must be taken into account when considering the need for, and assessing the risks of driving on Company business.
- On road refresher training to reinforce safe driving practices and to suggest improvements where necessary (eg: "defensive driving", "observed driving" or similar scheme) must be made available to all employees driving more than 5000 miles per year on Company business.

Sites or Business Units may impose a lower mileage limit. (It should be noted that the risk of death from driving 2000 miles per year approximates to the BNFL prompt death criterion of 1E-5/year.)

- The use of hand held mobile telephones is prohibited whilst driving on Company business. The use of installed car kits or mobile telephone hands free kits must be minimised, and long conversations must be delayed until it is safe to stop.

Measuring Performance

- An effective system must be in place to identify and record any significant failure to comply with the requirements of this entry, and its consequences. This record must be retained for use in the next management review covering the business area concerned.

Auditing and Reviewing Performance and Improving

- The effectiveness, efficiency and compliance with the requirements of this entry must be addressed through inspections and audits carried out in accordance with reference 2.
- The performance in complying with the requirements of this entry and its effectiveness must be addressed through the business area management reviews carried out in accordance with reference 2, making use of information from measuring and auditing activities.
- Any learning points for improving the requirements of this entry, or the corresponding site requirements, arising from independent inspection, audit and management review, must be fed back to the manager of the site management system or the manager of the UKEHS Manual for consideration of introduction of improvements as they decide appropriate.

References

- UKEHSM K3 "Tier 1 baseline accountabilities document"
- UKEHSM L14 "Management of independent inspection & audit and management review"

Issues which must be taken into account when considering the need to drive on Company business.

Avoidance of travel

Consideration should be given to avoiding the journey. It may be possible to conduct the business by:

- telephone
- video or telephone conferencing
- electronic mail
- fax

Alternative mode of travel

Alternative means of travel, such as rail or air should be considered where this is a reasonably practicable alternative. Motor cycle use must be discouraged and should be only permitted for short journeys.

Route and travelling time

When travelling by road, the time allowed for journeys must enable them to be completed without exceeding speed limits

The following also should be taken into account:

- Route - the intended journey should follow the safest available route, which may not necessarily be the shortest or quickest
- Driving time is part of the working day. Very long days must be avoided, particularly in winter. Overnight stops may be necessary to avoid very long days. As a guide, the working day including driving, should not exceed 14 hours.
- Breaks should be taken in the journey before the driver begins to feel fatigued - as a minimum, a 15 minute break every 2 - 3 hours is recommended. Where more than one person is travelling, consideration should be given to sharing the driving.

Weather conditions

Consideration should be given to expected weather conditions. For example, if, on the day of travel there is thick fog, icy conditions or heavy snow, the journey should be postponed or cancelled.

Vehicles

The contracts for hire and lease vehicles must specify that they must be provided in a road-worthy condition. If the driver considers that the vehicle provided is not in a roadworthy condition, the journey must not be undertaken, and the matter must be reported to the relevant purchasing department supervising the contract.

Where an employee drives their own vehicle on Company business, the employee has a responsibility to ensure that it is in a road-worthy condition and that it is insured for use on Company business.

Driving abroad

The risks involved in driving abroad must be assessed before the journey is undertaken. The degree of risk will depend on the country involved. Outside Western Europe and North America, it may be appropriate to consider the use of a local driver or taxi in preference to the employee driving.

Emergency equipment

Sites, Business Groups or Departments should consider the appropriateness of providing employees with emergency equipment, either on a personal or pool basis. Such equipment may include:

- mobile telephone for emergency use
- first aid kit
- warning triangle
- high visibility jacket
- fire extinguisher

Health

Employees should seek the advice of BNFL Occupational Health Departments if they are aware that they suffer from a medical condition or take medication which may affect their ability to drive, or the length of time they can drive.

Further Advice

Further advice can be found in "Managing Occupational Road Risk" - Royal Society for the Prevention of Accidents, reference IS 738