Managing Occupational Road Risk: Supplementary Guidance

Preventing Inappropriate Use of Speed;
Preventing Falling Asleep at the Wheel; and
Ensuring Driver Competence

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Comments:
Comments on this document are invited and should be sent to:

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Background

In March 1998, RoSPA issued guidance (‘Managing Occupational Road Risk’) which explained steps that employers should take to manage risks faced (and created) by their employees when at work on the road. The guidance stresses the need for employers to address these risks using the management systems (policies, people, procedures) that they should already have in place to manage other occupational health and safety issues. The guidance urges all organisations to follow the five-element risk management system approach advocated in the Health and Safety Executive’s publication ‘Successful Health and Safety Management’ (HSG65).

Essentially this involves employers:

- Setting and communicating corporate policy and objectives in relation to risk on the road;
- establishing the necessary organisation to achieve these (particularly establishing key responsibilities and competencies e.g. of managers and drivers);
- developing a planned approach to risk control (informed by risk assessment and driven by standards, targets and timescales);
- establishing active performance monitoring and arrangements for learning from accidents and incidents; and
- making time and space for periodic performance review so that lessons learned can be fed back to ensure continuous improvement in at-work road safety performance.

The guidance also stresses the need for employers to consult with employee representatives, including trades union safety representatives (where these have been appointed) about occupational road risk and their organisation and arrangements for ensuring work related road safety.

This broad approach has since been mirrored in the report of the Government’s independent Work Related Road Safety Task Group, which, like RoSPA, has also stressed the strong ‘business case’ for MORR (see HSE’s website www.hse.gov.uk/road/content/traffic1.pdf).

To help organisations develop their occupational road risk, pending revision of ‘Managing Occupational Road Risk: A RoSPA Guide,’ RoSPA has developed the following ‘ten-point’ Codes of Supplementary Guidance on policies to:

(A) Prevent inappropriate use of speed by drivers;
(B) Prevent drivers falling asleep at the wheel; and
(C) Ensure driver competence.

Both the RoSPA guidance and the WRRSTG report stress the need for employers to take account of these issues when carrying out risk assessments and monitoring performance (particularly when investigating the immediate and underlying causes of crashes).
(A) Preventing Inappropriate Use of Speed

Preventing Inappropriate Use of Speed

People who drive or ride too fast for the prevailing road and traffic conditions cause, or contribute to, one third of road crashes. Drivers and riders exceeding the speed limit are more likely to be involved in crashes and their higher speed means that those crashes are likely to cause more severe injuries, either to themselves or to other road users.

The term inappropriate speed encompasses both ‘excessive speed’, when the speed limit is exceeded (sometimes by wide margins) but also driving or riding within the speed limit when this is too fast for the particular conditions at the time (for example, in poor weather, poor visibility or high pedestrian activity).

In addition to being a problem on its own, inappropriate speed also magnifies other driver errors, such as driving too close or driving when fatigued or distracted, multiplying the chances of these types of driver behaviour causing an accident. Inappropriate speed removes the driver’s safety margin. Higher speeds mean that drivers have less time to identify and react to what is happening around them, and it takes longer for the vehicle to stop.

Speed is a contributory factor in about one third of all road collisions. This means that in the year 2000, around 72,000 reported road accidents were due at least in part to someone driving or riding too fast. These accidents caused:

- the deaths of about 1,100 people
- serious injuries to about 12,700 people
- slight injuries to about 900,000 people.

If an individual drives more than 10-15% above the average speed of the traffic around them, they are much more likely to be involved in an accident. Drivers who speed are more likely to be involved in collisions. They are also more likely to commit other driving violations, such as red-light running and driving too close.

Impacts at higher speeds are more severe than at lower speeds and thus lead to more serious injuries to those involved, particularly for pedestrians and other vulnerable road users. The probability of serious injury to a person wearing a seat belt in a front seat at an impact speed of 30mph is three times greater than at 20mph. At 40mph it is over five times greater.

The DTLR 2001 Speed Survey showed that:

- More than half of all cars on motorways and dual carriageways exceed the speed limit.
- 66% of cars exceed the 30 mph limit in urban areas.
- On 40 mph roads, 25% of drivers speed.
- Motorcyclists are the most likely to be speeding on 40 mph urban roads.
- On urban 30 mph roads, 54% of 2-axle LGVs exceed the speed limit.
Most drivers will admit to speeding sometimes, but surveys have identified those groups who are most likely to do so include:

- car drivers from high-income households;
- high-mileage drivers of newer, large cars;
- company car drivers;
- drivers who drive as part of their work;
- young, novice drivers; and
- male drivers.

Drivers often justify speeding on the basis that they are ‘ordinary, safe speeding drivers’ and that speed limits are unrealistic. A survey by the AA Foundation for Road Safety Research concluded that ‘speeding is not seen as a crime’, - ‘serious speeding is accepted as dangerous, moderate speeding is not’.

Education is absolutely vital in trying to change attitudes towards speeding. It is essential that the dangers caused by driving at inappropriate speeds are clearly explained and demonstrated (in the way that has been done for drink-driving) in order to work towards a general public acceptance and ownership of the problem of illegal and inappropriate speed.

**Ten Point Code on Preventing Inappropriate Use of Speed**

1) **Safe Driving**

The organisation should make it clear that it expects its employees to drive safely at all times for their own benefit and that of others. It should emphasise that the achievement of good progress on the road does not depend on the inappropriate use of speed.

2) **Raising Awareness**

The organisation should ensure that: its policy on safe use of speed is clearly communicated to all employees (including during driver training); that it is backed by appropriate publicity; and that awareness of the policy and the issues involved is maintained through regular communications and feedback - both on high standards of compliance as well as on cases where employees have failed to comply.

3) **Keeping within Speed Limits**

The organisation should make it clear that: it expects all its employees to never drive faster than road or driving conditions safely allow; that employees should obey posted speed limits and reduce speed further if necessary; and that persistent failure to do so will be regarded as a serious matter.

4) **Leading by Example**

As in other areas of company policy, all senior managers should lead by personal example, both in the way they drive themselves and in encouraging colleagues to drive safely.
5) Planning Safe Journeys

The organisation should also make it clear that all journeys must be planned with safety in mind, allowing sufficient time to enable employees to travel at safe speeds and to comply with speed limits - taking account of reasonably foreseeable weather and road traffic conditions and allowing sufficient time for rest breaks to avoid fatigue.

6) Avoiding Incentives to Speed

The organisation should avoid having in place work targets, systems of work or performance related methods of remuneration which may create pressures which lead its employees to use speed inappropriately and travel at speeds which are likely to be unsafe or in excess of the set speed limits.

7) Vehicle Allocation

It should ensure that the performance characteristics of its vehicles are matched to the competence level of drivers to whom they are allocated. Research has also shown that often it is the powerful company cars, having an added status appeal, which are involved in speeding.

9) Active Monitoring

Organisations should consider and put in place appropriate monitoring arrangements to assess the extent of employee compliance with its policy on speed. This should include options such as: feedback from employees; monitoring licences for points and recording all fixed penalty tickets issued to company car drivers; use of ‘roadwatch’ reporting schemes; and selective use of technology such as tachographs, on-board ‘black boxes’ and GPS (global positioning system) based telematics which can give a record of average and maximum speeds.

9) Reactive Monitoring

Wherever practicable ‘at work’ vehicle accidents and incidents should be investigated by the organisation to determine whether inappropriate use of speed by the employee was a contributory factor.

10) Liaising with Police Forces and Road Safety Bodies

The organisation should seek to liaise with police forces and other road safety bodies as appropriate, to establish if and how co-operation can be achieved in pursuit of its policy on vehicle speed.

Remember:

SAFE DRIVERS KNOW THEIR LIMITS …AND STAY WITHIN THEM!
Preventing Falling Asleep at the Wheel

Driver fatigue is a serious but under-recognised road safety issue. It is considered to play a significant part in up to 25 per cent of vehicle accidents on motorways, longer dual carriageways and other fast roads.

Because drivers who fall asleep at the wheel usually fail to take evasive action (such as braking and swerving) before crashing, the resulting impacts and injuries are generally more severe than in other kinds of road accident.

Accidents due to falling asleep at the wheel are more likely to occur at certain times of day – typically from midnight to 2.00am, in the early hours of the morning from 4.00 am to 6.00am and in the early to mid afternoon, typically 2.00 – 4.00pm.

Factors that may predispose drivers to falling asleep at the wheel include:

- the amount and quality of sleep before driving (the most important factor);
- consumption of alcohol (which may potentiate sleepiness at the above times even at levels below the legal maximum blood-in-alcohol concentration) or sleep inducing drugs;
- certain kinds of illness;
- boredom (especially on long, featureless roads and where the driver is alone in the vehicle);
- age (the tendency to ‘dip’ increases in middle years and there is also research arguing that younger people do experience an increasing need for sleep, which is not helped by their often hectic social activities).

Feeling tired at the wheel can affect the driver’s ability to concentrate, to correctly perceive, assess and respond to road hazards and to make safe driving decisions. It can increase reaction times as well as levels of stress and irritability. Research confirms that drivers who fall asleep at the wheel are conscious of feeling sleepy and continue to ‘fight’ sleep for some time before crashes occur. They may however have fallen asleep for a short period, say 30 seconds (in which time, at 70 mph, they will have travelled over 1000 yards!) but have no recollection of this.

Driving while fatigued is an offence under road traffic law and may result in prosecution leading to imprisonment and other penalties. Where employers have caused their employees to work and/or drive for so long that they become dangerously fatigued, they too may be guilty of an offence and may be liable to prosecution under road traffic or health and safety law.
Ten point Code on Preventing Falling Asleep at the Wheel

1) Safe journey/safe driver

When assessing risks to establish safe systems of driving, employers should ensure that ‘the driver is fit to drive and that the drive is fit for the driver’. In practice this means firstly that employers should ensure that employees are not over-tired at the start of journeys and that they are not required to drive for an excessive number of hours. Journeys should be carefully planned in advance and designed so as to enable drivers to take a break of at least 15 minutes every 2 hours. When driving to carry out other work tasks, drivers should not normally be required to drive more than 350 miles in a single day.

2) Raising Awareness

As part of driver training, employers should ensure that drivers are reminded about:
- the danger of falling asleep at the wheel;
- the need for safe journey planning;
- the early signs of fatigue and the times of day at which sleepiness is most common;
- the strategies which they can employ to cope with its onset should it occur; and strategies which are generally ineffective (see below).

(Although there are a variety of technological devices which, it is claimed, can detect the onset of driver sleepiness, drivers should not rely on such devices but plan head for adequate rest. RoSPA stresses the need for drivers to be fully briefed on this issue so that they are alert to the problem and can take appropriate action.)

3) Safer Alternative Travel

Where long journeys cannot be undertaken without a significant risk of drivers becoming fatigued, consideration should always be given to using remote communications such as video conferencing as an alternative or to using safer, alternative transport modes (although where train/drive or fly/drive options are considered, drivers will need vehicle familiarisation).

4) Preparation for Driving

Line managers should ensure that employees are made aware of the need to get an adequate amount of good quality sleep before starting to drive. Rest is not a substitute for sleep! Employees should be reminded of the dangers of common practices such as ‘moonlighting’ or spending too long engaged in evening hobbies, social activities or domestic work that may limit time available for sleeping.

5) Reporting Fatigue

Employees whose sleep may be interrupted, for example, by having to care for young children or sick or elderly relatives during the night, should be asked to report this to their managers and be reassured that this will not lead to them being discriminated against unfairly.

6) Shift Arrangements

Night shifts and rotating shifts cause the most severe sleeping disruptions of any work schedule. Research has also shown that 12-hour shift workers, compared to 8 hour, were significantly sleepier at the end of their shift, especially at 7.00am. Employers
should review shift arrangements, wherever possible in consultation with safety representatives, to see that these do not lead employees to drive while fatigued. Where particular shift patterns may give rise to a potential problem, including increasing risks during commuting to and from work, safer, alternative transport should be considered.

7) Driving Home

Drivers should be warned about the risks involved in driving home for long distances after a day’s work away from their normal base. Attention should be drawn to the dangers of driving for long periods on long stretches of boring and monotonous road. Consideration should be given to always allowing drivers to ‘overnight’ away from home, while recognising that many employees will seek to return home for domestic reasons.

8) Safe Coping Strategies

In particular, employers should stress that when drivers feel sleepy, they must stop in a safe place as soon as practicable. Warnings should also be given about ineffective coping strategies (winding the windows down, turning up the radio, singing songs, chewing gum), stressing that, if sleepiness does occur, the best short-term measure is the consumption of two cups of strong coffee followed by a ten to fifteen minute nap. It is important to stress that this should not be used more than once in a single journey and that sleep should not last more than twenty minutes otherwise even greater driver impairment may result due to increasing grogginess.

9) Active Monitoring

Employers need to be able to monitor driver sleepiness along with other key indicators of at-work road safety performance. Managers, for example, should ask their drivers about this problem during periodic performance appraisals. Journey planning should be monitored, for example by sampling, to see whether safe journey parameters are being observed.

10) Reactive Monitoring

Finally, drivers should be encouraged and thanked for reporting on instances when they have experienced sleepiness at the wheel, both to share such experiences with colleagues and to see what lessons, if any, can be learned. Crashes while driving for work, particularly those with no other apparent cause, should be investigated to establish whether fatigue or sleepiness may have been a contributory factor.

Remember:

TIREDNESS KILLS, DON’T FIGHT SLEEP - STOP IN A SAFE PLACE AND TAKE A BREAK!
(C) Ensuring Driver Competence

Ensuring Driver Competence

While organisations should, in the first instance seek to control risk on the road by reducing or eliminating the need to travel by this mode or by designing safe journeys and specifying safe vehicles, wherever driving is part of work, they must ensure that employees involved have the necessary competence to drive safely. Competence for safe driving is about ensuring appropriate attitudes as well as behaviour, particularly as driving for work often entail lone driving, without reference to supervisors or other colleagues, over prolonged periods.

The following ten-point code has been produced by RoSPA to supplement its existing MORR guidance and to help organisations review their policies and arrangements for ensuring the competence of their drivers to drive safely. (See Appendix 4 and 6 of the RoSPA MORR Guidance for further guidance on driver competence.)

Ten Point Code on Ensuring Driver Competence

1) Commitment to Safe Driving Competence

As part of its overall commitment to manage occupational road risk, the organisation should have clear statements in place which indicate that, notwithstanding its commitment to reduce risk on the road by all other reasonably practicable means, it will take steps to ensure the competence of its employees to drive safely whenever they are required to drive vehicles as part of their job.

2) Raising Awareness

The organisation should ensure that, its policy on driver competence and development (including fitness to drive and knowing what to do in an accident or emergency) is communicated effectively to all its employees, that it is backed by appropriate publicity and that awareness of the issues involved is maintained through regular communications and feedback.

3) Continuous Improvement

The organisation should make it clear that it wishes to achieve a record of continuous improvement in individual, group and corporate standards of driving competence.

4) Driver Assessment

Drivers’ competence to drive safely should be assessed at interview and/or prior to the allocation of driving tasks. Assessment should take account of the driver’s attitude, road safety knowledge and driving skills at the wheel as well other evidence such as age, experience, accident and enforcement history (including penalty points status) and past training record.

5) Minimum Standards

The organisation should set appropriate standards of competence to drive safely to be met by employees before they can drive vehicles on the road for work purposes,
recognising that: driving skills deteriorate with time; possession of driving licence of itself does not necessarily imply such competence; and that the risk of accidents is also related to the amount and type of driving which employees are required to undertake. (The organisation may also choose to apply such standards to any other named drivers of its vehicles.)

6) Prioritised Driver Development

The organisation should put in place a prioritised programme of driver development, including defensive driving training, that is designed to meet the development needs of those staff with greatest needs (for example, based on evidence from driver assessment, amount and type of driving, accident and enforcement history and so on.)

7) Targets

Targets for improvement in assessed standards of driving competence should be set for individuals, key groups and/or for the whole organisation.

8) Leadership by Example

All managers should make a personal commitment to lead the policy by example, in emphasising the importance of driving competence to colleagues, in identifying the level of competence that they seek to achieve themselves by training and in their everyday driving behaviour.

9) Recognition of Achievement

The organisation should ensure that personal achievement in developing and maintaining driving competence is recognised and commended to colleagues. For example through issuing of certificates of assessed training achievement to individuals and/or groups, by use of awards schemes and by other suitable means which make such achievement visible to key audiences.

10) Monitoring and Review

The organisation should have effective arrangements in place to monitor the implementation and effectiveness of their policy on driver development, including:

- monitoring adherence to assessment procedures and delivery of training;
- monitoring the driving behaviour of its employees on roads (for example, by studying feedback from drivers, use of ‘road watch’ schemes, monitoring of licences for evidence of road traffic offences, use of technology etc.);
- identifying the extent of any shortfall in driver competence revealed by accident and incident investigation; and
- reviewing the impact of training on accident rates.

Remember:

SAFE DRIVERS NEVER STOP LEARNING!
Conclusion

RoSPA suggests that, in consultation with workforce representatives, all organisations review their existing policies, standards and arrangements against these codes and develop a prioritised action plan with timescales for implementation.

Consultation is particularly important where employers may be considering using the fee-for-service driver licence status print-out facility operated by the Driver and Vehicle Licensing Agency (DVLA) which requires each driver to provide informed consent before details can be released to third parties (see www.dvla.gov.uk or phone 0906 139 3837 – premium line service calls charged 49p per minute).

RoSPA calls on all industry and trade associations, professional and road safety bodies, trades unions, insurers, local authorities, and police forces to support these codes and to commend them to their members.

Feedback

The Society would like to hear from companies and other organisations that have taken successful initiatives in relation to: preventing inappropriate use of speed; preventing falling asleep at the wheel; and ensuring driver competence - so that examples of good practice can be placed in the public domain.

Further Information


‘Managing Occupational Road Risk: The RoSPA Guide’ (1998, a RoSPA priced publication)

‘RoSPA Safe Journey Planner’, (free from RoSPA)


‘Creating an Accident Free Culture’ (W.Murray, E Dubens, 1998 published by Fourth Dimension InterActive Ltd)


*Successful Health and Safety Management, HSG(65)* Health and Safety Executive guidance available from HSE publications.