

Grey Fleet: Occupational Road Safety Guide



PROGRAM MODEL

Prepared for

Members of the
Manufacturing Safety Alliance of BC

Prepared by

The Manufacturing Safety Alliance of BC

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Disclaimer

This publication is intended solely for internal use as an awareness and information guide. It is not intended as a statement of the standards required in any particular situation, nor is it intended that this publication should in any way advise anyone regarding legal authority to perform any activities or procedures.

Every effort was made to ensure the accuracy and relevance of this information; however, this material may be subject to change due to various factors. These factors may include regulatory or interpretive changes, and a need to adapt the material to unique situations or procedures.

Nothing in this package and the course program absolve participants from using their sound judgment in the appropriate application of the material learned.

Contents

Introduction	4
Check the Regulations	5
5 Steps to Occupational Road Safety: Process Flow Chart	7
STEP 1. Policy Statement	8
STEP 2. Review the Current Situation	9
STEP 3. Identify Risks and Hazards	10
STEP 4. Develop Written Occupational Road Safety Programs	11
4.1 Vehicles	12
4.2 Drivers	13
4.3 Practice	14
Basic Vehicle Emergency Kit	16
Additional Contents for Winter or Remote Conditions	16
Driving Alone	17
Incident Reporting and Investigations	18
Disciplinary Process	18
STEP 5. Regular Evaluation of the Grey Fleet Program	19
Review of 5 Steps to Occupational Road Safety	20
References	21

Introduction

The Manufacturing Safety Alliance of BC's Occupational Road Safety Guide has been developed to provide guidance to an organization in implementing a grey fleet program at their workplace.

This guidebook was developed taking into consideration WorkSafeBC's OHS regulations cover the risk factors, identification by assessment, and controls to be put in place. They also state the components of a grey fleet program by discussing the education and training needed and the evaluation of the program.

This guidebook provides simple yet succinct information on how to develop a program while following the **Plan-Do-Check-Act Cycle** framework.



The grey fleet is an important, but often neglected, aspect of management. The grey fleet consists of employee-owned vehicles, bought with their own money and reimbursed on a pence per mile basis. Employers need to understand: if driving is work-related, they share the responsibility to ensure it's done safely. The responsibility extends beyond just paying for work-related mileage. As an employer, it is your responsibility to establish and maintain a safety program that address the risks your employees face when driving for work purposes.

Check the Regulations

Review the relevant regulations to understand the legal obligations of company owners, managers, supervisors and employees. For an overview, visit the following Laws.

Visit the Workers Compensation Act and the WorkSafeBC Occupational Health and Safety Regulation. While several sections of regulation have implications for road safety and vehicles, pay particular attention to Part 2.2, Part 3, Part 4, Part 16 as well as Part 7 and Part 8. Keep in mind that each motor vehicle your employees operate in the course of their work is considered as a workplace.

If your organization operates commercial vehicles, there will be information important to your organization in the following Acts, Regulations and Standards.

- Motor Vehicle Act and its associated Regulations
- Passenger Transportation Act and its associated Regulations
- Commercial Transport Act and its associated Regulations
- Transport of Dangerous Goods Act and its associated Regulations
- Cargo Securement Standard, Part 10

Employers with commercial vehicles licensed with a gross vehicle weight of more than 5,000 kg, with a seating capacity of 10+ passengers plus the driver, or operating under the Passenger Transportation Act need to be familiar with National Safety Code requirements. See the National Safety Code Safety Plan Guidelines. Find further information at the Commercial Vehicles Safety and Enforcement website.

The Manufacturing Safety Alliance of BC's "5 Step to Occupational Road Safety" is an educational guide and reference tool to help reduce injury and death due to worker-related motor vehicle incidents. The practices are organized under five steps an organization can take to develop and maintain a successful occupational road safety program:

Step 1:
Policy Statement

Step 2:
Review Statistics

Step 3:
Risk Assessment

Step 4:
Develop Written Program

Step 5:
Regular Evaluation of the Grey Fleet Program



5 Steps to Occupational Road Safety Process Flow Chart

STEP 1

- Get Management Commitment
- Develop Policy Statement which outlines responsibilities for employer, supervisors and employees
- Demonstrate consistent communications regarding occupational road safety

STEP 2

- Conduct Safety Audit
- Collect and analyze incident statistics
- Consult with employees

STEP 3

- Identify hazards
- Consider the frequency with which employees are exposed to each hazard
- Conduct risk assessment

STEP 4

- Develop strategies related to vehicles
- Develop strategies related to drivers
- Develop strategies related to practices
- Address issues regarding distracted driving, fatigue, emergency, driving alone and incident reporting and investigation

STEP 5

- Regular review the grey fleet program
- Assess of opportunities for continuous improvement

STEP 1. Policy Statement

The first step is to get commitment from management. Management should understand their roles and responsibilities.

Management should ensure:

- Policies and procedures to facilitate development, maintenance and improvement of occupational road safety programs.
- Appropriate financial and other resources are allocated to occupational road safety programs and activities.
- Incident data and other appropriate record is collected, analyzed and retained.
- Clear and consistent communications regarding occupational road safety.
- Management style facilitates effective program delivery.

Policy statements demonstrate employer's commitment to the health and safety of all employees. Identify specific road safety responsibilities that individuals within the company. Various Acts and Regulations, particularly the Occupational Health and Safety Regulation, describe several key responsibilities and rights of individuals within a company.

The Responsibilities section should outline the following question:

- Who is ultimately responsible for the road safety plan?
- Who is responsible for risk assessments?
- Who will write policies and procedures?
- Who will communicate the program to employees at all levels?
- Who will conduct inspections?
- Who will keep records, compile results and prepare reports or summaries for review?
- Who will conduct program evaluation, and how often will they do that?

STEP 2. Review the Current Situation

Look across your company and consider all of the circumstances and conditions in which employees drive for work. Conduct a safety audit at least once a year to identify issues related to occupational road safety. Review practices related to:

- Risk assessments
- Driver management
- Vehicle management
- Journey management
- Incident management

Review existing incident reports and collect data related to vehicle, driver and journey.

INCIDENT			
Checklist from RoadSafetyatWork.ca			
<ul style="list-style-type: none"> <input type="checkbox"/> Fault <input type="checkbox"/> Location <input type="checkbox"/> Underlying cause <input type="checkbox"/> Immediate cause <input type="checkbox"/> Witnesses <input type="checkbox"/> Speed of vehicle <input type="checkbox"/> Conditions <ul style="list-style-type: none"> • Road • Weather • Visibility • Traffic Road Configuration <ul style="list-style-type: none"> • Intersection • Curve • Straightaway • Parking Area • Roundabout • Gradient 	<ul style="list-style-type: none"> <input type="checkbox"/> Road surface <ul style="list-style-type: none"> • Gravel • Paved • Mixed • Under construction <input type="checkbox"/> Road type: <ul style="list-style-type: none"> • Private • Public • Parking lot • Residential • Arterial route • Highway 	<ul style="list-style-type: none"> <input type="checkbox"/> Incident Type: <ul style="list-style-type: none"> • Rear-end • Head-on • Side • Roll-over • Off road • Near miss • Vandalism • Theft <input type="checkbox"/> Movement of vehicle: <ul style="list-style-type: none"> • Reversing • Going straight • Changing lanes • Doing U-turn • Pulling out • Stopping • Parking 	<ul style="list-style-type: none"> <input type="checkbox"/> Total cost of incident to organization <ul style="list-style-type: none"> • Injuries • Vehicle repair • Loss of productivity • Time off due to injuries • Administration <input type="checkbox"/> Injuries: <ul style="list-style-type: none"> • Driver(s) • Passenger(s) • Others (pedestrians, other vehicle occupants, etc.) • Treatment • Cost of treatment
DRIVER			
<ul style="list-style-type: none"> <input type="checkbox"/> Driver license information: <ul style="list-style-type: none"> • Number • Type • Status <input type="checkbox"/> Driver Injuries: <ul style="list-style-type: none"> • Time off due to injury • Status 	<ul style="list-style-type: none"> <input type="checkbox"/> Medical conditions: <ul style="list-style-type: none"> • Diabetes • Vision • Sleep apnea • Heart disease • Stroke • Cognitive impairment 	<ul style="list-style-type: none"> <input type="checkbox"/> Human factors: <ul style="list-style-type: none"> • Speed • Aggressive driving • Vision • Decision-making • Fatigue • Distraction • Impairment 	<ul style="list-style-type: none"> <input type="checkbox"/> Utilization of safety devices: <ul style="list-style-type: none"> • Seat belt • Child seat • Anti-lock braking systems (ABS) • Back-up alarms
VEHICLES			
<ul style="list-style-type: none"> <input type="checkbox"/> Vehicle type: <ul style="list-style-type: none"> • Car • Passenger van • Utility van • Bus • Truck 	<ul style="list-style-type: none"> <input type="checkbox"/> Vehicle information: <ul style="list-style-type: none"> • Ownership • Defects • Kilometres • Age • Air bag deployment 	<ul style="list-style-type: none"> <input type="checkbox"/> Vehicle signals: <ul style="list-style-type: none"> • Type present • Working order 	<ul style="list-style-type: none"> <input type="checkbox"/> Vehicle damage: <ul style="list-style-type: none"> • Damage • Impact of damage • Repair cost
JOURNEYS			
<ul style="list-style-type: none"> <input type="checkbox"/> Purpose of vehicle use: <ul style="list-style-type: none"> • Delivery • To attend meeting • Sales visit 	<ul style="list-style-type: none"> <input type="checkbox"/> Planned route: <ul style="list-style-type: none"> • On planned route • Direction of travel 	<ul style="list-style-type: none"> <input type="checkbox"/> Time: <ul style="list-style-type: none"> • Peak or low traffic time • Time since beginning of shift 	<ul style="list-style-type: none"> <input type="checkbox"/> Distance: <ul style="list-style-type: none"> • Km driven that shift • Km driven that journey

Be mindful of the cost of:

- Different types of incidents
- Repairs/100,000 km driven
- Hidden costs, such as lost productivity and absences from work

STEP 3. Identify Risks and Hazards

A risk assessment of an individual driver includes a review of the driver's:

- Attitudes about risk and driving
- Exposure to risk and type of driving
- Skills
- Substance use screening information
- References (pre-hire)
- Violations
- Involvement in crashes and near misses
- Fitness to drive (e.g., medical conditions)

RISK ASSESSMENT MATRIX			CONSEQUENCE				
			FIRST AID	MEDICAL	STD	LTD	DEATH
			Insignificant	Minor	Moderate	High	Extreme
Likelihood			1	2	3	4	5
	Certain	5	5	10	15	20	25
	Likely	4	4	8	12	16	20
	Possible	3	3	6	9	12	15
	Unlikely	2	2	4	6	8	10
Rare	1	1	2	3	4	5	
15-25		A	Stop work and implement immediate corrective action				
8-12		B	Corrective action applied immediately, but work may continue				
1-6		C	Corrective action to be scheduled and carried out as appropriate				

Consult with employees who are familiar with those hazards, or who are likely to encounter them to help identify hazards and assess risks. Identify all of the hazards they encounter, plus the hazards you can reasonably anticipate employee will face. Consider the probability an incident will occur, and the consequence. Explain that in terms of the extent or magnitude of personal injury or property damage, or both.

Use the resulting scores to decide which hazards are the greatest priority for attention and action. The information is gathered from formal or informal discussions, debriefing sessions, lunchtime events, focus groups, guided discussion and surveys. Through this process, valuable input is obtained from employees on:

- Policies and procedures
- Safety leadership
- ORS program development
- Issues
- Safety culture

Don't neglect acting on "small" hazards; sometimes it takes years to reduce risks associated with tough hazards, but you can be proactive and take quick, easy steps to effectively manage issues that are readily within your control.

STEP 4. Develop Written Occupational Road Safety Programs

Describe the steps employees and supervisors will take to manage journeys.
As you develop this policy and its safe work procedures, think about the following questions:

- What process will employees and supervisors use to determine if travel or driving is necessary? Are there any alternatives? (e.g. online meetings, teleconferences, public transportation, air travel, walking, etc.)
- Must travel be approved by supervisors? Under what circumstances is driving not acceptable?
- What are the steps employees will take to confirm they are fit to drive, check that vehicles are ready to go, and select a time and route that minimizes exposure to hazards?
- What check-in system will employees use to confirm their safe arrival? What emergency procedures will staff activate if an employee misses their check-in?

The organization ensures strategies are developed to address the most significant risks, hazards and problems. Address issues rising from:

- Vehicles
- Drivers
- Journeys

4.1 Vehicles

Policies and procedures related to vehicles are written and include the following components:

1. Vehicle selection policy

- Minimum safety standards and features
- Sufficiently equipped for anticipated road and weather conditions?
- How to deal with deficiencies
- Vehicle size and power
- Required training for type of use

2. Safety technology policy

- Audible reverse alarms
- Following distance warning devices
- Electronic stability control (ESC)
- Driver fatigue monitoring devices
- GPS
- Telematics to measure driving performance

3. Vehicle replacement policy

- Age
- Condition
- Crash involvement
- Damage

4. Vehicle inspection procedures

- Pre-trip inspections
- Periodic professional inspections

5. Maintenance and repair standards

- Schedules
- Required documentation
- Required guidelines and standards that as a minimum are stated in:
 - BC Motor Vehicle Act
 - BC's Commercial Vehicle Safety and Enforcement's (CVSE)
 - Vehicle Safety and Inspection Standards
 - Owner's manuals

6. Documentation

- Maintenance records and schedules
- Inspection records and schedules
- Fuel consumption records
- Crash involvement for each vehicle

7. Insurance Coverage

- Insurance requirements for employee-owned and rental vehicle

4.2 Drivers

Develop a safe driving pledge: an agreement in which drivers agree to obey the rules of the road and organization policies, and employers agree to manage the safety of drivers.

1. Recruitment, selection and induction procedures

- Defined terms of reference
- Prerequisite for an appropriate class of driver's license and a clean driving record

2. Selection:

- Driving record check
- Clarifying driving tasks in an interview
- Determining candidates' attitudes toward safety
- Identifying candidates' driving limitations

3. Assessment of:

- Driving skills, knowledge and attitude
- Mechanical skills, if appropriate

4. Medical examination:

- Assessment of fitness to drive
- Vision exam

Possession of a driver's license may be insufficient evidence that an employee is qualified to operate a vehicle. Employers need to provide orientation specific to the workplace. Special considerations to new and young workers should be given as they usually don't have the driving or life experience that older, seasoned drivers have. And, there is substantial research indicating young drivers generally have a higher risk profile than older drivers. Consider what extra training and orientation is necessary to prepare these workers for the driving you will assign them. Make sure there are certain driving assignments supervisors cannot assign a young driver until they have demonstrated specific competencies.

Keep in mind that any vehicle or vehicle type that an employee has not operated before is considered as a new workplace. When you replace their vehicle with different model or brand, steps should be taken to confirm they understand and can operate the new features.

Consider the following questions when developing a training session:

- What skills and behaviors do employees need to complete driving assignments safely?
Do some vehicles, routes or circumstances require specialized skills?
- What education, training and instructional resources will be used to provide and build those skills?
- What methods are most effective in developing skills?
- What methods will you use to verify competency (e.g. “show me” evaluation, written test, oral quiz)?
- How often will education be repeated, reinforced and updated?

Records including the following should be retained:

1. **Driver licenses and driver abstracts**
2. **Records of training**
3. **Records of driver performance, including incident involvement and corrective action.**

4.3 Practice

Even though some company rules may be legal requirements that all drivers must obey, reinforcing those requirements in your plan demonstrates employer commitment to upholding laws and clarifies that the employer expects drivers to comply. The rules your organization agrees upon might include:

- Wearing a seatbelt when driving and requiring passengers to do so
- Observing and obeying posted speed limits
- Compliance with Electronic Communication Devices laws, and expectations around use of other devices or equipment not covered by that law
- Prohibition against operating a vehicle when impaired by fatigue, alcohol or prescription/non-prescription/illicit drugs
- Expectations of the conduct and activities of passengers if allowed (e.g. no horseplay)
- Whether employees are permitted to carry pets
- Cargo securement
- Ergonomics – adjusting mirrors, seat and headrest before driving, taking breaks during long trips, organizing and stowing items in the cab, etc.
- Rules for operating a motor vehicle on a work site or in restricted zones
- Expectation that drivers conscientiously self-assess to confirm they are fit to drive before operating a vehicle (well-rested, mind on task, etc.)
- Not smoking in work vehicles
- Transportation of flammable, volatile or otherwise hazardous materials goods

Distracted Driving

Driving while distracted has become the leading cause of crashes and fatalities. Talking or texting on a phone while driving is the biggest contributor of the issue. It's not just teens who are a concern – too many drivers of all types, such as managers hurrying to a meeting; supervisors directing employees; marketing agents; workers driving a well-labeled company vehicle; and professional drivers operating big rigs have been observed engaged in a cell phone conversations, texting, or fiddling with their navigation or audio system. Distracted driving is such an important and pervasive road safety issue, that your organization should demonstrate a clear Distracted Driving Policy.

If company employees need to use their phones, they must pull over safely to the side of the road or another safe location. Additionally, company employees are required to:

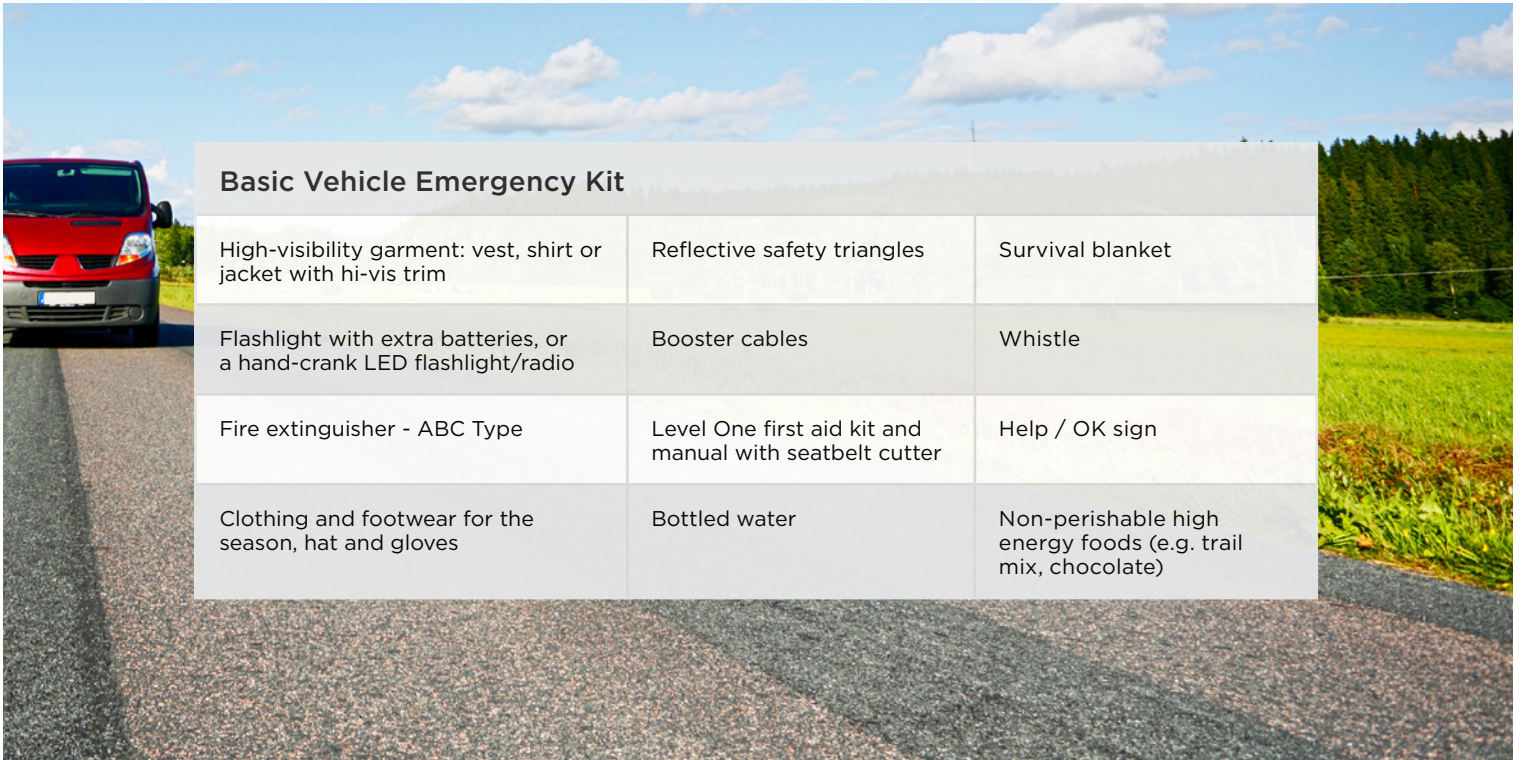
- Turn cell phones off or put them on silent before starting the car.
- Consider modifying voice mail greetings to indicate that they are unavailable to answer calls or return messages while driving.
- Inform clients, associates and business partners of this policy as an explanation of why calls may not be returned immediately.

Fatigue Management

Fatigue is a leading contributor to motor vehicle crashes. Acute and accumulated driver fatigue present significant hazards in many work places especially for those with lengthy commutes, extended work shifts, or who do shift work that includes driving at night or in the very early hours of the morning. Your road safety program should describe the steps the organization and drivers will take to manage fatigue.

Emergency Plan

Each vehicle and driver should be prepared to deal with emergencies. The contents of a vehicle's emergency kit depends on the driving circumstances and conditions that drivers will encounter. A good practice is to carry a basic emergency kit and add items to handle winter driving or travel in remote locations. Store the contents in a sturdy, waterproof plastic container or a zippered gear bag for protection. Inspect kits every six months to confirm all the contents are there and check expiry dates on any perishable items to ensure they are still good to use.



Basic Vehicle Emergency Kit

High-visibility garment: vest, shirt or jacket with hi-vis trim	Reflective safety triangles	Survival blanket
Flashlight with extra batteries, or a hand-crank LED flashlight/radio	Booster cables	Whistle
Fire extinguisher - ABC Type	Level One first aid kit and manual with seatbelt cutter	Help / OK sign
Clothing and footwear for the season, hat and gloves	Bottled water	Non-perishable high energy foods (e.g. trail mix, chocolate)



Additional Contents for Winter or Remote Conditions

Windshield scraper and snow brush	Gas line antifreeze, windshield de-icer	Shovel
Sleeping bag / warm blankets	Traction mats or kitty litter or sand	Candles, waterproof matches and tin to hold the candle
Tire chains	Compass, maps / GPS	Wheel chocks, tire repair kit or extra spare tire
Duct tape, light rope	Tow strap	Tools: tire wrenches, screw drivers, adjustable wrench, pliers, multi-function knife

Driving Alone

WorkSafeBC OHS Regulations 4.20-4.23 describe *working alone* as circumstances “where assistance would not be readily available to the worker in case of an emergency or in case the worker is injured or in ill health.” Your employees might sometimes drive in situations where assistance is not readily available such as driving in remote locations or at night. In these situations, an employee is effectively “working alone”. Your road safety plan should describe procedures the organization will take to minimize driving alone, and steps they will take to safeguard employees who have to drive or work alone.

A check-in mechanism combined with a travel plan communicated to the check-in contact can work well for working alone situations. Some organizations use in-house resources to manage check-ins, while other organizations use a third-party service provider to monitor drivers and confirm check-ins. Employers with employees driving alone typically require them to carry a reliable means of communications such as a charged cell phone or satellite phone.



Incident Reporting and Investigations

Incident reporting and investigation are legal requirements by WorkSafeBC OHSR. Injuries must be reported to WorkSafeBC within three business days of the injury's occurrence or your representative becoming aware of the injury. Serious injuries and fatalities must be immediately reported. Take that opportunity to develop and implement measures to ensure similar events don't occur in the future.

To draft this section, think about the following questions:

- Which motor vehicle incidents will be reported? Only those required by Regulation? All incidents? All incidents and near misses? Who is responsible to report the event? How will reports be documented and filed?
- Which motor vehicle incidents will be investigated? Only those required by Regulation? All incidents? All incidents and near misses? Who will participate in investigations: managers, supervisors, safety committee members, specialists? What is the investigation process?
- Who will receive and review investigation reports? Who is responsible to ensure corrective actions identified in investigation reports are implemented?



Incident investigation training is available at the Manufacturing Safety Alliance of BC

Disciplinary Process

Although a road safety plan is developed and presented as a tool for success, every organization could encounter circumstances in which an employee fails to comply with legal or company requirements. It may be necessary to implement disciplinary measures to enforce correct behaviors. It benefits all parties - employers, supervisors and employees - to think about, and be aware of, what those steps are before the situation arises.

Address the following questions when writing disciplinary plans:

- What action will be taken if an employee accumulates too many penalty points while driving for work? How many is too many? Six? Nine? More?
- What action will be taken if an employee is involved in repeated at-fault crashes?
- What steps will the company take in response to very serious driving infractions (e.g. that result in the company vehicle being impounded or that cause substantial property damage or injury)?
- If the company determines that because of repeated driving non-compliance, it is necessary to assign an employee to duties that do not include driving, what steps will the employee and company undertake before those privileges and work are returned?

STEP 5. Regular Evaluation of the Grey Fleet Program

Based on the established objectives and targets, the company should evaluate the fleet program on a quarterly basis.

Key metrics to be reviewed should include:

- Intended outcome of strategies
- Outputs and target dates for completion of each step
- Number of changes implemented based on identified road hazards and concerns
- Reduced incident rates
- Improved communications between workers and management
- Improved reporting of hazards
- Improved participation by workers and supervisors
- Costs and benefits

The management review will include an assessment of opportunities for continual improvement. The organization shall continually improve the effectiveness of the fleet program. This may include review of current control strategies, review of best available methods, technologies, and procedures to address residual risks, and implementation strategy to ensure continual improvement.

Review of 5 Steps to Occupational Road Safety

STEP 1

- Get Management Commitment
- Develop Policy Statement which outlines responsibilities for employer, supervisors and employees
- Demonstrate consistent communications regarding occupational road safety

STEP 2

- Conduct Safety Audit
- Collect and analyze incident statistics
- Consult with employees

STEP 3

- Identify hazards
- Consider the frequency with which employees are exposed to each hazard
- Conduct risk assessment

STEP 4

- Develop strategies related to vehicles
- Develop strategies related to drivers
- Develop strategies related to practices
- Address issues regarding distracted driving, fatigue, emergency, driving alone and incident reporting and investigation

STEP 5

- Regular review the grey fleet program
- Assess of opportunities for continuous improvement

Reference

British Columbia's Preferred Practices for Occupational Road Safety. 2011.
roadsafetyatwork.ca/wp-content/uploads/2011/10/ORS-Preferred-Practices-Report.pdf

Road Safety Plan Template. Road Safety At work
roadsafetyatwork.ca/driver-tools/tool-kits/road-safety-plan-template

WorkSafeBC OHS Regulation & Related Materials
www2.worksafebc.com/publications/OHSRegulation/Home.asp

About us

The Manufacturing Safety Alliance of BC, formerly known as FIOSA-MIOSA Safety Alliance of BC, was established in December 2007 to reduce the high injury rate in the food and manufacturing industries.

Our mission

We are catalysts for improving workplace health and safety within the BC Manufacturing Industry. Our leading edge health and safety programs, services and tools enable companies to make a difference in the lives of their employees – every day.

Our vision

Partnering with BC's industry leaders to achieve cultural change that ensures safe workplaces for all employees. The Manufacturing Safety Alliance of BC strives to accomplish our mission and vision through the delivery of a variety of core services including:

- Training in areas such as occupational health and safety (OHS) leadership, program building, and auditing.
- Consultation and advisory services.
- The certifying partner for the Occupational Safety Standard of Excellence (OSSE) in partnership with WorkSafeBC.

For more information please contact us: