
Transport & Driving Management System

1. Introduction

This Management System consists of various policies concerned with 'Driving Safely', 'Driving Standards'

'Company Vehicles', 'Emissions' and 'Security'. Safety is the company's number one concern, but the policies also prioritise to health, environment, and quality. It has been produced to ensure that the operations of J. Suttle Transport Ltd and Suttle Projects comply with client's and regulatory requirements when working on projects requiring FORS accreditation. As such, these management systems should be followed when any work is carried out in areas within the scope of FORS.

The Management System is written around the requirements set out in the latest FORS Standard but also contains the policy wording, referred to in the Employee's Employment Contract, by which use of any vehicle provided by the Company ("the Company Vehicle") is governed.

Availability of Management System

The Management System will be made available on the intranet with the system updated as necessary with amendments. All paper issues of the Management System are to be controlled by the document management system.

Scope

J. Suttle Transport Ltd (t/a Suttle Stone Quarries) is a quarry and waste transfer station operator, aggregates haulier/merchant and waste carrier. It operates a fleet of rigid flatbed and tipper lorries between 18-32t GVW as well as a fleet of service vans under 3.5t GVW. J. Suttle Transport Ltd provides administrative and maintenance support to its associated company 'Suttle Projects Ltd'.

Suttle Projects Ltd is a civil engineering and specialist piling contractor which works on and near Network Rail infrastructure and local authority schemes often on and around watercourses. It operates a fleet of service vans which are all under 3.5t GVW.

2. Driving Standards and Safety (D2)

Up to 1 in 3 road crashes involves a vehicle being driven for work. Every week around 200 road deaths or serious injuries involve someone driving for work. Many of these deaths and injuries could have been prevented.

As an employer, Suttles group is committed to reducing the risk of work related road traffic crashes and collisions. Suttles recognises its duty under the Health and Safety at Work Act 1974 to ensure the wellbeing of all our employees as far as reasonably possible. This includes work related driving activities.

We understand that the following legislation applies to us.

Legislation

Health and Safety at Work Act 1974
Management of Health and Safety
at Work Regulations 1999
The Workplace (Health, Safety and
Welfare) Regulations 1992
Road Traffic Acts supported by the
Highway Code
EC Drivers' Hours Rules
UK Domestic Drivers' Hours Rules
Tachograph Regulations
The Road Transport (Working Times)
Regulations 2005
The Road Vehicles (Construction
and Use) Regulations 1996
Corporate Manslaughter and
Corporate Homicide Act 2007

Key requirements

Employers have a "duty of care" for the safety of employees at work, regardless of the type or size of the business. There is also a duty of care to others who may be affected by their business activities, which, in the case of driving, means all other road users. Employers are required to carry out risk assessments, make arrangements to implement necessary measures, appoint competent people and arrange for appropriate information and training.

These Regulations cover a wide range of basic health, safety and welfare issues including traffic routes for vehicles within the workplace.

The Highway Code applies to all road users and includes information on signs and markings, road users, the law and driving penalties. It is an offence for an organisation to set driver schedules which may cause them to break speed limits and / or have payment reward schemes which in any way give them incentives to do so.

It is the driver's and employer's responsibility to ensure compliance with drivers' hours and Tachograph Regulations. They are applicable to goods vehicles in excess of 3.5 tonnes. Tachographs must be used to record hours of driving, other work, breaks and rest periods.

Additional information can be found on the DfT website (use the search function and type in "tachograph" or "drivers' hours"). Provides information regarding the safety of loads on vehicles. The Act introduces an important new option for certain very serious senior management failures which result in fatality. Prosecutions will be of the corporate body, not individuals, but the ability to prosecute directors or other individuals under health and safety law or the general criminal law, in appropriate cases, will be

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unaffected. The corporate body itself and individuals can also still be prosecuted for separate health and safety offences.

These policies and procedures apply to all employees who drive in connection with their employment whether it is in their own vehicle, a fleet vehicle or a vehicle hired by the company. This policy should be read in conjunction with the driver handbook. Failure to follow any of the policies in this document can result in the instigation of the disciplinary procedure.

Management policies

The Transport Manager has been assigned specific responsibility for managing driving at work. They can be contacted on 01929 439444. The company has also appointed a road risk champion (John Suttle) and deputy (Lauren Davis). The champion is responsible for reducing risk in our fleet operations and implementing appropriate control measures in support of the Transport Manager.

The management will routinely undertake, record and act on the findings of risk assessments dealing with all aspects of driving at work including driver safety, vehicle safety and journey planning.

The management will ensure that every incident involving any vehicle driven on behalf of the company is recorded and that collective information is regularly analysed and action taken to reduce recurrence if necessary.

Vulnerable road users

The term 'vulnerable road users' is referred to in the Highway Code as:

- Pedestrians, particularly children, older or disabled people
- Cyclists
- Motorcyclists
- Horse riders

It is important that all road users are aware of their obligations under the Highway Code. This applies to pedestrians as much as to drivers and riders. The hierarchy of road users must be understood and its rules and implications observed.

All company drivers must ensure that they are aware of vulnerable road users and that care and attention is given to their potential presence at all times, as per their relevant training. Drivers of vehicles over 3.5 tonnes GVW must perform daily checks on VRU safety equipment and vehicles under 3.5 tonnes must perform their checks weekly.

Lone Working

The Health and Safety Executive (HSE) defines lone workers as 'those who work by themselves without close or direct supervision.' In our business we have identified the following regular lone working situations:

- LGV Drivers going to and from sites
- Van Drivers going to and from sites

We have undertaken risk assessments of these lone working activities and put in place risk control measures including:

- Two-way radio systems for communicating with base (to be used in accordance with our in-vehicle technology procedures that follow)
- LGV GPS trackers including geofences and timefences
- Dashcam and vehicle CCTV systems for reviewing footage
- Driver liaison representative working in collaboration with the Transport Manager

As a result of the risk assessments we have informed staff that the following tasks may not be undertaken as a lone worker:

- Tipping material at Swanworth after sunset

All employees are instructed that they must immediately leave any situation in which they feel uncomfortable or at risk and that such action has the support of management.

3. Vehicle Usage, Safety and Roadworthiness

(V1)

1. The Company will provide the Employee with the Company Vehicle for **business use only, unless specifically agreed in your contract of employment.**
2. The Company will provide the Company Vehicle on condition that the Employee agrees to the terms herein.

The Company agrees to:

- (a) Provide the Employee with the Company Vehicle to enable them to perform their duties including travel to and from their place of work.
- (b) Pay the cost of the insurance, road fund tax, maintenance and general running costs;
- (c) Provide Fuel for the vehicle or to reimburse the Employee for fuel only for all business miles, subject to the Employee producing the necessary vouchers and completed forms, at the rate from time to time determined at the discretion of the Company.

The Employee agrees to:

- (d) Keep the Company Vehicle in a clean and tidy condition;
- (e) Be held personally liable if the vehicle is returned to the Company in an unreasonable state of cleanliness;
- (f) Bear any costs incurred by the Company to rectify any failure to keep the vehicle tidy and clean;

- (g) Bear the costs personally in the event that the Employee incurs any speeding or parking fines, or any other private or public penalty as a result of the use of the vehicle;
- (h) Ensure that no other person, other than Employees of the company is allowed to use the vehicle. Use by any other person with the Employee's permission and which results in a loss to the Company, will result in the Employee being held personally liable and will be regarded as a serious breach of the Company's disciplinary procedure;
- (i) Be responsible for submitting the vehicle for maintenance and repairs as necessary in accordance with the warranty or legal requirements.
- (j) Notify the company immediately (or within 48 hours at the latest) of knowledge of any infraction, fine, charge, conviction or pending conviction that could affect the employee's licence to drive.
- (k) Notify the company immediately (or within 48 hours at the latest) of knowledge of any medical constraint or requirement to take medication that could affect the employee's licence or capability to drive
- (l) **Perform Vehicle Checks;** Immediately upon starting each day, or when taking over a vehicle from another driver, either at the beginning or during a shift, each driver will satisfy themselves that the brakes and steering are in good working order on the vehicle allotted to them. If they consider that either system is faulty, inadequate, or in need of adjustment, they must report immediately to the office (if necessary by telephone) without attempting to drive the vehicle, when they will be instructed on the action to be taken to have the adjustments or repairs affected.

Each driver is responsible for checking the following items twice daily at least and when taking over a vehicle;

- (i) Road wheel nuts. Failure to carry out this instruction will leave employees open to instant dismissal and liable to the cost of any damage caused as a result.
- (ii) Wheeled Loaders – Diggers and any other off-road wheeled plant and equipment wheel nuts should be checked;

On taking over the vehicle

Daily for 5 days after wheel removal (i.e. at service intervals or punctures etc.)

Weekly

Daily Checks

- Engine oil Level
- Vehicle cleanliness (including cab interior)
- Tyre Pressures

- Coolant level in radiator
- Windscreen washers
- Vehicle to be fuelled up at the end of each day (**AFTER FUELLING THE DIESEL TAP MUST BE LOCKED AND VEHICLE FUEL CAP LOCKED**)

Weekly Requirements and Checks

- Battery condition and level of fluid
- General tyre condition checked
- Vehicle cleanliness
- Vehicle must be greased to company standard (company standard set by Mr. M. R. James) – normally Saturday
- Carry out any minor repairs as instructed by Foreman.

Any defect or damage with any of the vehicles or equipment belonging to J. Suttle Transport Limited must be reported immediately. Failures to report damage or defects leave employees open to dismissal.

NOTE that the offence is failure to report damage or defects, not causing of damage or defect, although this may also render employees open to dismissal if caused through negligence.

3. Use of the Company Vehicle in a negligent or dangerous manner, or the repeated failure to keep the vehicle clean and tidy, may be regarded as a breach of the Company's discretionary procedure, which may, in turn be regarded as a serious breach of the Company's disciplinary procedure.
4. Any driver of a Company Vehicle shall not drive whilst using a mobile telephone or other distractive in-vehicle technology (e.g Sat Nav, radio, media players) at any time. If phone calls must be made/received whilst driving, they should be taken by a passenger or, if you are travelling alone, you should find somewhere safe to pull over before making or receiving the call or adjusting other in-vehicle technology. If all of these options are impractical, calls may only be taken using a "hands-free" unit.
5. If instructed by the Company, the Employee shall return the vehicle to the Company's offices or such other address as instructed, together with the documents for the vehicle and any other relevant items in connection with the vehicle.
6. If the Employee is not able to carry out his employment duties for any reason, he should return the Company Vehicle to the Company, as it is supplied for business use only and, unless specifically provided, there is no entitlement to private use.
7. The management will ensure that when choosing vehicles to be used on behalf of the company that they are entirely suitable for their intended purpose and that utmost importance is placed on safety features.

8. The management will ensure that all vehicles used on behalf of the company are regularly inspected and strictly maintained using at least the manufacturer's recommended service schedules (and if applicable, in accordance with Operator licence requirements).
9. Employees are required to complete the daily record checks for each vehicle that they drive. Record sheets must be dated and signed and kept in the vehicle with a counterfoil returned for the attention of the workshop.
10. Employees must complete a vehicle defect form as soon as the defect is found. The completed form must be handed to Jimmy James immediately. Verbal reporting of a defect without completing a defect form is not acceptable.
11. All reported defects will be dealt with promptly. Any vehicle with a serious defect making it unsafe for employees and/or members of the public will be taken off the road immediately until a repair has been carried out.
12. All company vehicle drivers must be aware of their own and others' safety when in and around vehicles. All types of vehicle can pose threats to personal safety whether being driven, accessed, loaded, unloaded or left unused.
13. Any employees driving their own vehicle on behalf of the company will be required to present their vehicle registration document (V5), insurance certificate and MOT certificate (if applicable) on an annual basis. Employees should ensure that their vehicle is insured for business use.
14. Any employee driving their own vehicle must ensure that it is kept in a safe and roadworthy condition at all times. The management accept that employees may be without their vehicle when repairs are necessary to keep the vehicle in a safe and roadworthy condition. However, employees must give as much notice as possible so that alternative arrangements can be made.
15. Tacho cards must be used in accordance with training and any lost, stolen or defective cards must be reported immediately to the Transport Manager and to DVLA. You must apply for a replacement card within 7 days.

4. Access and Egress, Loading/Unloading **(V5)**

Lorries: Always use the proper access steps, handrails etc, and maintain three points of contact at all times whilst climbing in or out of vehicle. Nothing should be held in your hand whilst gaining access or exiting the vehicle. **Never** jump down from a vehicle. Three points of contact must be maintained at all times. Make sure doors are secure and cannot swing open or close inadvertently. Keep access equipment clean and report defects. Vans: Always access vans when the engine is off and the van is parked on level, stable ground. Load compartments should only be accessed when parked correctly and the keys are out of the ignition.

Loading and unloading should be:

- Clear of other traffic, pedestrians and people not involved in loading or unloading.
- Clear of overhead electric cables so there is no chance touching them, or of electricity jumping to 'earth' through machinery, loads or people.
- Level. To maintain stability, trailers should be parked on firm level ground,
- Loads should be spread as evenly as possible, during both loading and unloading. Uneven loads can make the vehicle or trailer unstable.
- Loads should be secured, or arranged so that they do not slide around. Racking may help stability.
- Safety equipment must be considered. Mechanical equipment and heavy moving loads are dangerous.
- Vehicles must never be overloaded.
- Overloaded vehicles can become unstable, difficult to steer or be less able to brake.
- Always check the floor or deck of the loading area before loading to make sure it is safe. Look out for debris, broken boarding, etc.
- Loading should allow for safe unloading.
- Loads must be suitably packaged. When pallets are used, the driver needs to check that:
They are in good condition
Loads are properly secured to them.
Loads are safe on the vehicle. They may need to be securely attached to make sure they cannot fall off.
Tailgates and sideboards must be closed when possible. If over-hang cannot be avoided, it must be kept to a minimum. The over-hanging part of the load must be clearly marked.

Loads on Load Carrying Vehicles.

Drivers are responsible for the safe loading of their vehicles. Any load, which in their opinion would be unsafe, should be referred by telephone to the company's office. Drivers must also ensure the load is properly secured against spillage, leakage, pilferage or damage.

Drivers should not drive their vehicles off the public highway into private gateways, drives or to other places not designed for heavy traffic unless they make sure that the customer is aware that any damage or costs associated with the retrieving of the vehicle are the responsibility of the customer, and tickets should be signed prior to delivery.

If in the driver's opinion there is likelihood of damage or of being 'stuck in' or any other problem associated with leaving the public highway, then this should not be undertaken.

The Company has relied upon certain evidence produced by the Employee of his qualifications and references and it is a condition of his employment that the Employee has been truthful about such evidence.

Coupling & Uncoupling

The business runs one drawbar trailer which is operated predominantly by one driver, with another providing holiday and absence cover as required. Any driver who is involved in using the trailer is briefed on the ACOP for coupling and uncoupling (Safe Coupling and Uncoupling Guide) and receives internal training before use. The trailer is checked as part of pre-use checks and defects recorded.

5. Vehicle Manoeuvring

Most accidents can be avoided by taking simple precautions. Where possible, the need for reversing should be eliminated, however where reversing cannot be avoided

When visiting sites make sure you are familiar with the layout of the workplace and any site rules. If you have to report to reception on arrival make sure you do

Where possible, use the help of a 'banksman', whose job it is to keep the reversing area free of pedestrians, and to guide drivers. If there isn't a banksman and you need help, it's always better to ask than risk having an accident

When using a banksman, make sure you understand their signals before starting the reversing manoeuvre. If you lose sight of him/her, stop immediately

Reverse slowly and with caution, minimising the distance. Be prepared to stop instantly

If you can't see behind the vehicle, or you're unsure of distances, stop, get out of your vehicle and check access before continuing the manoeuvre

All collisions (minor and major) and near misses should be reported to your supervisor as soon as possible.

As a driver you should understand the risks of leaving your vehicle badly parked and how to avoid doing this.

Carelessly parked vehicles can injure or even kill people. For example: A vehicle parked on a slope can move if all of the brakes are not used properly. Remember it can take very little slope to make a vehicle move.

Vehicles should be parked on firm and level ground, in a designated parking area if one is available.

Drivers when driving own vehicles (grey fleet)

Management must ensure that employees who drive their own vehicle for work purposes:

Have insurance for business use

Have a current tax disc and MOT certificate if applicable

Ensure their vehicle is maintained in a safe and roadworthy condition at all times

Do not drive their vehicle until any identified defects have been rectified.

6. Routing and Scheduling

The management encourages use of alternative modes of communication or transport where this is practical. Road journeys will only be carried out when they are really necessary. The management also encourages vehicle sharing when practical.

The management will ensure that necessary journeys are scheduled to a realistic timetable and are planned to take into account the essential need for adequate rest

periods. Any employee who feels that their timetables/schedules are unrealistic and they need to take risks/ break speed limits to complete them must voice their concerns with their line manager as soon as possible.

The management will monitor weather conditions and will reschedule deliveries and/or appointments etc, if conditions become too dangerous for the drivers.

The transport manager and drivers will endeavour, where reasonably practicable, to plan routes that avoid VRU hotspots (e.g start/finish of school, hospitals, cycle lanes and cycle events). All drivers and transport managers should be aware of avoiding relevant local tolls, height/weight limits and permit zones. Managers and Drivers should ensure any emissions or congestion charging zones potentially on their route will be complied with and always paid for in advance where applicable.

7. Driver Safety Induction, Incidents and Complaints (D2, D3, M9)

Suttles has provided company vehicles with handbooks that include road safety guidance and sets out individual driver responsibilities, in support of the company's policies and procedures, e.g. what to do in the event of an incident, collision or complaint. The company has also appointed a road risk champion (John Suttle) and deputy (Lauren Davis). The champion is responsible for reducing risk in our fleet operations and implementing appropriate control measures in support of the Transport Manager.

All employees must follow all procedures detailed policies and procedures briefed at induction and other periodic briefings. Company induction is completed on new employees' start dates and is based on the 'New Starter Checklist'. This includes (but is not limited to) driving assessment, briefing of Company and Transport management system procedures, medical declaration, eye test and basic incident/collision training and procedures. FORS eLearning enrolment is also begun at this stage.

All new employees driving on behalf of the company will have their driving documents checked to ensure they are properly licensed for the class of vehicle that they will be driving. They will also complete a driving assessment to ensure that they are competent.

All employees will be required to have their licences checked every six months for van drivers and 3 months for LGV drivers. Frequency is reviewed altered as applicable, according to regulatory requirements (e.g. FORS standard) when penalty points are accumulated.

All employees must inform their line manager of any imposed or pending driving penalties, convictions or medical/medication limitations within 48 hours. These will be dealt with on a case by case basis.

All employees are required to report any road safety or security concerns that they have within a reasonable period of time.

Any employee that is offered further training as a result of a high number incidents or concerns from other employees is required to accept this offer.

Seat belts must be worn at all times when fitted. When children are carried the law concerning child restraints will be referred to and abided by at all times.

All employees must report all at work crashes, complaints and collisions promptly having followed procedures detailed in the below procedure policy (also refer to driver's handbook.) Transport manager and support staff are then tasked with investigating as per the FORS collision management flow chart and forms. Collisions and complaints are added to the feedback register and closed out.

8. RTC/Breakdown Procedure (O3)

All company vehicles should be supplied with three documents, if a vehicle does not contain one or more of these the driver must notify their supervisor immediately:

- (a) Breakdown recovery contact sheet
- (b) Motor Accident Form
- (c) Insurer details accident card

In the event of a Road Traffic Accident, breakdown or any incident which causes damage or injury to company or third-party vehicles or those travelling in them, the driver must first ensure the vehicle is moved to a position of safety (if possible).

Breakdowns – In the event of a breakdown or puncture, drivers should phone either:

- (d) Transport Manager / Fleet Engineer at JST Main office (01929 439444). During office hours (0730-1730 Monday-Friday)
- (e) Recovery company as per the 'Breakdown recovery contact sheet' or Jimmy James (07976718002) outside of office hours.
- (f) Puncture repairs/wheel changes should only be attempted if you are in a safe position off the public highway.

RTC – as soon as practical and safe, the following steps should be taken:

- (g) Phone any emergency services if required
- (h) Exchange details with any third party driver by giving them our 'Insurer details accident card' and taking their details (as listed on the 'Motor Accident Form')
- (i) Our driver must then complete as much as possible of the 'Motor Accident Form' using the information obtained. This must only be attempted if in a safe area away from the road. Drivers must never admit liability under any circumstances.
- (j) If the accident occurs during office hours (0630-1700 Monday-Friday) the driver should contact the Transport Manager at JST Head Office (01929 439444).
- (k) The Transport Manager will assess the situation according to his RTA Procedure Document and advise the driver on what action to take.

- (l) If once the 'RTA Procedure Form' is complete, the vehicle is roadworthy and the driver has been assessed as fit to drive then they will be allowed to continue on their journey. If the driver is assessed as not fit to drive by the Transport Manager after completing the 'RTA Procedure Form', arrangements will be made to recover the driver and vehicle as soon as possible.
- (m) Once back at the office the driver will complete the insurer's in depth 'Motor Accident Form' and the Transport Manager and/or Road Risk champion will investigate the incident in full using vehicle CCTV, trackers and any other information available before communicating this to relevant parties in the form of alerts, recommendations, or retraining and disciplinary procedures as required.

9. Transport Infringements, Charges and Fines

This policy is to be followed should an employee who is allocated a company vehicle incur fine, charge, penalty or similar as a result of any of the following driving offences:

- Parking tickets
- Driving in bus lanes or stopping in box junctions
- Congestion or emission zone charges
- Speeding
- Vehicle condition
- Vehicle load security
- Vehicle overloading
- Any other driving related infringement, infraction or prohibition

An employee allocated a commercial vehicle is the nominated driver until the vehicle is surrendered and is responsible for the vehicle and for any driving offences and fines incurred. An employee who receives a fixed penalty notice must notify their line manager immediately as there may be a legal obligation on the company to notify the Traffic Commissioner of any fixed penalties and convictions. It is also imperative that relevant convictions are reported to FORS as per section D2 of the standard and their T&Cs.

Failure to notify the company of any fixed penalty will be considered gross misconduct and will result in the employee being subject to the company's disciplinary procedures. An employee who receives a ticket/fine for a driving related offence must act upon it immediately. Failure to do so could result in disciplinary action.

Where the employee accepts responsibility for a driving offence, or there is clear evidence that the employee is liable, the company shall be entitled to deduct from the employee's salary/wages the cost of any fines not paid by the employee, plus the cost of any administration fees charged to the company by a third party. The company will notify the employee in writing in advance of any deduction being made. The employee will be able to contest any fine received.

Drivers who regularly incur charges for traffic offences will be subject to the company's disciplinary procedures.

Parking tickets

Employees must ensure that all parking ticket fines are paid promptly, or are properly contested to prevent any escalation in charges. Employees can do this by:

1) Immediately paying the fine directly to the charging authority 2) Pass the parking ticket to the transport manager who will contest the fine with the issuing authority.

If the parking fine is not paid or acted upon, the following procedure will apply:

- . 1) Suttles receives a fine that may have already escalated in cost
- . 2) The Transport Manager will contact authorised personnel to investigate
- . 3) Authorised personnel will confirm whether the fine is business or personal use
- . 4) If the fine is relating to business use, Suttles will arrange payment and recharge the employee
- . 5) If the fine is relating to personal use the driver will receive a letter from the company notifying them that a deduction will be taken for the fine amount direct from their salary
- . 6) Payroll will be notified
- . 7) Failure to take action will be subject to disciplinary procedures

Driving in bus lanes or stopping in box junctions

Driving in bus lanes within restricted hours or stopping in box junctions (unless you are turning right and your exit is clear) is prohibited and employees should ensure they comply with UK regulations. Photographic evidence against a driver can be provided and therefore, in most cases, these offences cannot be contested. The following procedure will apply should Suttles receive any penalty charges for this driving offence:

- . 1) Suttles receive an invoice for the offence
- . 2) Suttles will arrange immediate payment of the invoice and the employee will be recharged
- . 3) A copy of the invoice/fine is filed and recorded
- . 4) The company will confirm in writing that payment to cover the cost of the fine and administration charge will be deducted from their salary/wages

Congestion and emission zone charges

Employees must comply with company's congestion charging procedure relevant to their business unit. Failure to do so will result in the company receiving a penalty charge for the vehicle. The following procedure will apply:

- 1) Suttles receive an invoice for the offence
- 2) Suttles will arrange immediate payment of the invoice and the employee will

be recharged

3) Suttles will investigate all fines received. If it is found the driver has failed to follow the relevant procedures then a copy of the invoice/fine is filed and recorded

4) The company will notify the employee that payment to cover the cost of the fine and administration charge will be deducted from their salary/wages

Speeding

Travelling in excess of the posted legal speed limit is strictly prohibited and drivers of company vehicles should ensure they comply with UK and EU road traffic regulations. Photographic evidence against a driver may be presented if the offence is recorded by a camera. Speeding incidents identified using the vehicle tracking system will be investigated and drivers will be held accountable. This information will also be used to support and verify any speeding notifications received.

The following procedure will apply should Suttles receive a speeding notification:

1) Suttles receives notification of the offence and identifies the driver according to the number plate stated and records of authorised user

2) Suttles completes and returns the documentation to the police notifying them of the alleged offending driver's name. The police will then make contact with the driver and the relevant process will be applied, e.g. the driver may receive a fine and points endorsed on their driving licence or may be required to attend a court hearing

3) The employee must inform their line manager as soon as practicable of any convictions endorsed on their driving licence

Drive within legal speed limits but remember that this is a limit and not a target, always drive appropriately for the weather conditions and volume of traffic. Familiarise yourself with the Highway Code, there may have been several amendments since you last read it and follow the Rules of the Road guidance. Remember you are representing the Company whilst driving at work. Show consideration and avoid the temptation to respond aggressively in the face of other discourteous road users, so as to minimise possible 'road rage'.

10. Passenger Safety (O4)

2.10 Passengers have the potential to both aid and disrupt the safe and efficient completion of journeys. As a company we have decided to implement the following ten steps to being a safe passenger:

Do

1. Wear your seat belt. It's the law, it's there for your safety and you are not insured without it
2. Support the driver. Help ensure other passengers act responsibly and offer to help navigate if required

3. Keep communication to a reasonable level. The more people in the vehicle, the more distractions there may be from conversations, music, etc.
4. Pay attention to the road and let the driver know if there is an emerging hazard; you may be able to see a hazard while the driver is otherwise concentrating on the road ahead
5. Say something if you are concerned about a driver's behaviour or if he or she is driving too fast. But don't be a backseat driver

Don't

1. Get into a vehicle if you suspect the driver is under the influence of alcohol or drugs
2. Distract the driver. Drivers need to concentrate and distractions make this difficult
3. Encourage the driver to speed, break the law or conduct any other unsafe act. Even if you are late for a meeting
4. Block the driver's field of view through the windows and mirrors, particularly at junctions
5. Turn on interior lights at night – this can affect the driver's night vision and their ability to see properly

As per any such situation, if you are concerned about a driver's behaviour, or their standard of driving, and you don't feel that you can raise the issue directly, report your concerns to your line manager or confidentially in the form of a close call (using either your close call book or to the email closecalls@suttles.co.uk) as soon as possible.

11. Health and Eyesight (D6)

As per the company induction requirements, all employees must complete a self-certification medical declaration on induction and annually each new year (generally these are distributed in January). Medical declarations are reviewed by management and any conditions or medications are assessed confidentially on a case-by-case basis. Anything likely to affect driving capability must be discussed and resolved with the individual before driving – this may require investigation and confirmation from employee GP and/or DVLA. As well as self-cert declarations, medical baseline assessments (CBH medicals) are completed for all employees on induction and then re-assessed every 3 years.

Employees must report any new medical conditions or medication to the relevant manager before resuming driving duties. Failure to report medical changes likely to affect driving before resuming duties will cause commencement of company disciplinary procedure and could lead to dismissal due to gross misconduct.

To ensure drivers' eyesight is not a risk to safety, all company vehicle drivers are required to complete a 6-monthly eye test. The test can take the form of a Snellen chart test or number plate test. In either case, the results are recorded according to the relevant form as per the specification below and failure of either test will result in suspension of driving until further assessment by an optician can be completed and issues resolved.

"Test Specs:

Snellen test – (Charts are located at all offices):

- **Candidate must stand at least 3 Metres away from the chart**
- **Close one eye and read the chart as far as you can, now take note of the line number.**

- Repeat this on other eye.
- Are you able to read to at least line 9 with one eye closed and at least line 12 with your other eye closed.

Number plate test:

- Candidate must stand 20m away from the number plate.
- Reg number must be read correctly with both eyes and each eye separately.
- Reg number must be recorded below.

Please record the assessment details and result then sign the declaration below.

- 1 Type of eye test
- 2 Is there an existing eye condition or requirement to wear glasses/contact lenses?
- 3 Location of Snellen test / Number plate used
- 4 Result of the test given

If you have failed the eye test we require that you to be tested by an optician before driving company vehicles. You may also be asked to attend an optician eye test following and incident or close call if relevant. You are responsible for notifying us of any changes to your health, including eyesight problems or deterioration. Please sign and date below to confirm completion of this eye test and understanding of the above.”

12. Counter Terrorism and Security (O6, O7)

Company vehicle drivers must ensure that vehicles and contents are kept as secure as possible for various reasons. Theft, vandalism, personal assaults and attacks, organised crime and terrorism are just some of the main threats to our personnel and assets that we can partly protect against by ensuring that vehicles are kept secure.

The Suttles group recognises the current UK threat level has remained at ‘substantial’ or higher for some time and is likely to remain at this level for the foreseeable future. To this end we have implemented this Terrorism Risk and Security policy in an effort to reduce the potential for an attack to be realised. By implementing the measures and procedures described below we hope to ensure that our business and personal security is maintained despite the high levels of UK based attacks such as those in London in 2017. This policy also covers malicious attacks in any form including physical assault, vandalism and cyber-attacks.

As an employer, Suttles group is committed to reducing the risk of all malicious attacks including terrorism, assault and vandalism from whatever source. Suttles recognises its

duty under the Health and Safety at Work Act 1974 to ensure the wellbeing of all our employees and the public as far as reasonably possible. This includes as a result of work-related driving activities and the prevention of our business assets or personnel being involved in or affected by terrorism or other malicious attacks.

This policy and the procedures contained within are subject to continual review and improvement and should in any case be reviewed at least annually.

Risk Management Procedure

Terrorism and malicious attack threats and the risks of these being realised are assessed regularly by the company's management on an ongoing basis. These are recorded as risk assessments and are reviewed annually or when significant changes to working practice occurs. Threats can be split into Direct and Indirect, ie those that directly affect our business assets because they are targeted or those that indirectly impact us because we have assets that are within a broader target.

Threats are set out and assessed in our malicious attack risk assessment (appendix 1).

Suttles group vulnerabilities include but are not limited to;

- employees,
- customers,
- suppliers,
- quarry explosives,
- company vehicles,
- mobile plant,
- buildings,
- gas bottles,
- hazardous substances,
- computers and IT networks.

Identifying potential vulnerabilities is an ongoing process and when new vulnerable assets are identified this document should be reviewed.

Our Business Continuity Policy should be read alongside this document. It gives directions on emergency contact details, steps that should be taken and arrangements for facilitation of alternative resources including, employees, vehicles, plant, suppliers and IT networks/equipment. In addition to the contacts in the continuity policy, we have a nominated Counter Terrorism Champion, whose contact details are as follows:

John Suttle

01929 439444

john@suttles.co.uk

Reporting

If in doubt, any immediate threat to life should be reported directly to emergency services as quickly as possible:

- Call 999 – speak to the police and report incident or suspicions about an imminent threat
- Call 101 - speak to police if the crime does not require emergency response
- Call 0800 789 321 – Anti-terrorist hotline for immediate threats to life or property

Any incidents or suspicious activity related to terrorism or other malicious attacks such as assault should be reported to line managers who will in turn report to the Counter Terrorism Champion identified above or directly to the CTC. The CTC will report to the Police CT Liaison Officer or emergency services as required.

Potential incidents or suspicious activity that is not an immediate threat to life should be reported externally on the assessment of the CTC. Basic information required to assess whether external reporting is appropriate:

- Who and/or what was witnessed
- When it was seen
- Where it occurred
- Why it was suspicious
- Any other relevant information

Vehicle Security

As well as the ongoing risks of theft, vandalism and other intentional or malicious damage to our vehicles, plant and equipment, the increase in 'Vehicle as a Weapon' attacks means that the risk of our fleet of lorries, vans and plant being used by terrorists has increased. Whilst we are based in a rural location, our vehicles are frequently deployed in busy, heavily populated towns and occasionally cities.

Company vehicle drivers must ensure that vehicles and contents are kept as secure as possible. Unauthorised access to vehicles should be prevented by always locking vehicles when not in the driving seat. Keys are never to be left in vehicles whilst parked. All extra security measures such as after-market locks and alarms should be set when away from the vehicle.

In order to keep track of vehicles if theft were to occur, telematics and tracking systems are installed on all vehicles over 3.5 tonnes and geofencing facilities are used where appropriate to prevent vehicle theft and notify key personnel. Where possible company vehicles should be parked in secure areas, ideally covered by CCTV. Persistent incidents of damage, vandalism or theft relating to company vehicles may lead the company to review employee company car/van benefits.

Personnel Recruitment & Selection, Training & Security

In accordance with existing selection processes, all new starters must be assessed as eligible to work and are inducted on the company's policies and procedures. Pre-employment checks on employment history, qualifications, and (pending) convictions/prosecutions are required. Eligibility to work is checked according to identity assessment performed by individuals that have been trained on the Dorset Police counter-terrorism ID check course. A driving assessment is completed before induction into the company as a company vehicle driver.

Aside from separate explosives training and procedures (which include sensitive information that cannot be recorded in this document), employees involved in transport must complete Counter-terrorism eLearning with refreshers as required by FORS. Employees with HR responsibilities must complete the Dorset Police 'Identity Fraud and Terrorism Prevention' course which is supported by Dorset Police Counter Terrorism.

Employees, customers, suppliers and other visitors should be asked to sign in to all sites where appropriate and provide ID if requested. By attending our sites, employees, customers, suppliers and other visitors give consent to be monitored by our CCTV systems in the interests of security and safety.

13. Fuel, Tyres, Emissions and Air Quality **(O2)**

We are committed to making improvements in our emissions and therefore in air quality and health, for this reason we have company policy and procedures in place to help us achieve these improvements.

The purpose of this policy is to ensure all drivers exercise consideration to the business, the communities we operate in and the environment by driving to ensure the best use of fuel and tyres. We have appointed a Fuel & Emissions Champion (John Suttle), whose responsibility is to promote the reduction of fuel usage and emissions from vehicles used by the business.

This policy applies to all company drivers and aims to avoid unnecessary fuel and tyre use by correctly using the company's vehicles in accordance with the highway code and the Road Traffic Act, by driving safely and economically and ensuring that all tyre pressures and conditions are kept in accordance with Road Traffic law and the manufacturer's instructions.

It is also part of the company policy to see that all vehicles are kept in a clean condition at all times so as to reduce unnecessary drag on the vehicles and reduce fuel use with consideration to the environment.

The key objectives of the Tyre and Fuel Policy are to:

- To promote a culture of safety and exercise a 'duty of care' towards our people and environment
- To ensure all vehicles tyres are maintained to appropriate level required by the law
- To ensure all drivers, drive safely and economically so as to reduce fuel costs and the impact to the environment
- Avoid financial and reputational risks
- Maintain the Company's accreditations for safety

The risks identified and measures to reduce them will be monitored and reviewed periodically to ensure maximum effectiveness.

Senior management is to:

- To publish the Fuel and Tyre Policy and ensure it is effectively communicated to all managerial and driving staff.
- Ensure company vehicles used in connection with our business are fit and serviceable for the public highway.
- Ensure that vehicles are used in a fuel efficient way by use of monitoring fuel consumption.
- Ensure that management and supervisory staff are resourced, trained and empowered to ensure the duties outlined in this policy are adhered to.
- Ensure the company's Health and Safety obligations are met

Line management must ensure that:

- They are conversant with all procedures and documentation referred to in this policy and that the policy is fully implemented.

- All drivers are aware of their duties and responsibilities under this policy.
- Take appropriate action if any driver falls short of their duties and responsibilities under this policy.
- Provide professionally trained staff/contractors to carry out tyre pressure checks and replacement of defective tyres and undertake their responsibilities under the Health and Safety Legislation
- Ensure all staff are trained in efficient fuel use and tyre condition checks

Driving staff must ensure that they:

- Complete a daily visual walk around check and ensure that it is recorded on the appropriate paperwork
- Ensure company vehicles are kept clean at all times
- Ensure that the vehicles are compliant with the law.
- Ensure that a vehicle is not taken on to the road that is not road worthy.
- Drive in an efficient and effective way to minimise fuel use and emissions.
- Plan journeys to avoid cycle commuter routes at peak times
- Abide by H&S regulations and not attempt to change defective tyres or check tyre pressures.
- Read, know, understand and apply the Highway Code
- Report any infraction to the Senior Management

Emissions

Our company goal is to ensure fuel and tyre usage and related emissions are recorded, monitored and managed. Our target is always to reduce fuel usage and emissions year on year, we monitor these year on year trends via a macro-level spreadsheet that is a cumulative representation of our various KPIs. Within the general UK context:

- Road transport makes up about 17 per cent of the UK's CO₂ emissions. HGVs account for around 20 per cent of the overall transport sectors emissions
- Fuel represents 35 per cent of a transport operator's running costs
- The UK government is committed to reducing Green House Gas (GHG) emission levels by 80% from 1990 levels, by 2050

In order to ensure fuel usage is managed in an environmental and safe a manner:

- Record mileage and fuel use for regular journeys in order to pinpoint areas for improvement
- Minimise engine-idling – Today's vehicles are designed to warm up fast. Avoid idling when you can; idling is 0 miles per gallon. If your vehicle is likely to be stationary for more than two minutes switch the engine off (see 'Anti-Idling' Policy)
- Don't drive aggressively and do drive at a safe speed. Avoid aggressive driving and aggressive starts. All vehicles lose fuel economy at speeds above 55 mph.
- A 20 per cent reduction in fuel consumption can be achieved simply by reducing your speed from 56 mph to 50 mph
- Road type and traffic conditions play a part in the amount of fuel used on a journey. Changing gear, braking or accelerating often will increase fuel usage. Routes should be planned as per our routing and scheduling procedures (see 'Driving Safely' policy).
- Try to plan ahead use visibility advantage provided by the high seating position (in lorries) to regulate your speed, keep the vehicle moving and avoid having to

brake harshly. Keeping a vehicle moving, even at walking pace, requires considerably less fuel use than moving a vehicle from a standstill

- Ensure loads and empty tipper bodies are correctly sheeted as this will reduce aerodynamic drag and save fuel. Tests show that by correctly sheeting an empty tipper body at 56mph you could see improvements of over eight per cent
- Use the momentum of the vehicle on undulating roads to climb and descend hills. On modern, electronically controlled vehicles, when the foot is taken off the accelerator, fuel stops entering the combustion chamber and so the vehicle uses no fuel
- Cruise control should be used when it's safe and appropriate to do so as this will maximise fuel economy
- Exhaust brake (where relevant) should be used instead of the footbrake as this will contribute to smoother decreases in speed, increase the lifespan of brake linings and save fuel
- Avoid over-revving the engine – Lower revs give higher levels of fuel economy. Revs should be kept within the green band
- Park up in a way that will avoid early-morning manoeuvring with a cold engine - this wastes fuel
- Drivers should be aware of the average MPG for the vehicle they drive
- Take care when refuelling the vehicle. Fuel spillages need to be minimised and managed

Tyres

Our company goal is to ensure tyre usage and selection is recorded, monitored and managed. Within the general UK context:

- Approximately 20% of all breakdowns are tyre related
- There are roughly 12,000 commercial vehicle tyre failures on the Road Network each year and 5,500 of these impact the 'live' lane
- Driver and Vehicle Standards Agency (DVSA) officers and the police are able to issue fixed penalties at the roadside for unroadworthy vehicles. The charges vary depending on the type and frequency of the offence. Tyre condition and tread depth features highly amongst the major criteria for vehicle roadworthiness

In order to ensure tyres are maintained in an environmental and safe a manner;

- Drivers' should be competent enough to identify if a tyre fulfills legal requirements.
- The recommended tyre pressure should be stated on the vehicle.
- Tyres should be correctly inflated before journeys commence.
- Correctly inflated tyres offer less resistance on the road, improve fuel economy, give greater stability and reduce the risk of accidents.
- A fall in tyre pressure of 10lb psi is likely to result in a one per cent fall in fuel economy.
- Over-inflating tyres can reduce the vehicles handling and cause high wear in the centre of the tread. Particular vigilance is required regarding the correct inflation of twinned tyres if accelerated wear is to be avoided
- Avoid harsh braking and driving aggressively. Taking corners/curves too fast can wear the edges of your tyres
- Road type and ground conditions have a big impact on tyre wear. Try and avoid hitting potholes as these can create tyre leaks and wear and can alter wheel alignment.
- Take care to avoid speeding over puddles that could be hiding deep potholes. If possible, avoid them altogether
- Make sure the tyre valves are free from dirt and caps are fitted to each wheel
- Look out for any bulges, lumps or cuts to the tread and sidewalls and also remove any stones and other embedded objects. You shall do this as part of your daily walkaround check (Also see V2 toolbox talk)

- If the front tyres show signs of excessive or uneven wear get the steering alignment corrected
- Where regrooved tyres are concerned, check that there are no exposed cords. If there are, advise your fleet manager immediately as the tyre is unsafe for use

Idling

Idling is defined as ‘the running of an engine which is not required for the examination or operation of machinery other than that used for driving the vehicle’

Paragraph 123 of The Highway Code states that ‘you MUST NOT leave a parked vehicle unattended with the engine running or leave a vehicle engine running unnecessarily while the vehicle is stationary on a public road’

Excessive idling can be considered an offence under Section 80 of the Environmental Protection Act 1990. Some Local Authorities have implemented financial penalties for excessive vehicle idling.

In order to minimise vehicle emissions that negatively impact on the environment and health, Suttles group is committed to reducing vehicle idling times at depots, in traffic queues and at any other times unnecessary idling takes place. The company actively encourages drivers to reduce levels of idling.

As a company, we’ve implemented anti-idling measures to:

- Reduce unnecessary vehicle idling
- Improve air quality
- Protect health
- Reduce wasted fuel
- Reduce costs

Drivers are in charge of their company vehicle, therefore they are responsible for levels of engine idling and any fines incurred

Drivers must switch engines off when stuck in non-moving traffic or are stationary (ensuring that road safety is not compromised), when parked up, and during breaks

Anti-idling Rules

- Don’t leave an unattended vehicle’s engine running
- Don’t leave the engine running in the depot
- Don’t leave the engine running when you are parked up, or when you’re on a break
- Don’t leave the engine running during loading and unloading
- Cab heaters are provided for cold starts and defrosting – use them!
- If you anticipate being stationary for more than one minute then switch off your engine as soon as you are stopped

Noise

Our premises include the operation of plant and vehicles and work activities such as processing of stone and recycled products. These activities, vehicles and equipment have been subject to a noise assessment under the Control of Noise at Work Regulations and it has been determined that the average noise exposure in the worst-case scenario, is below the level at which hearing damage is likely to occur.

Where our employees are at risk from high levels of noise we arrange for a specialist to undertake an assessment of noise exposure. As a result of these assessments we have implemented risk control measures including limiting the exposure times and reducing proximity of sources to receptors. Warning signage is in place where necessary.

Potentially hazardous areas regularly encountered include the fixed crushers and mobile plant at SWQ, the mobile crusher and plant at MHR, the Saw sheds at CAQ. Access routes to site and weighbridges can also be noisy areas, especially if anti-idling policy is not followed.

The purpose of these control measures is to eliminate hazardous exposure and to reduce noise exposure to as low a level as is reasonably practicable. For tasks which involve exposure above the first action level (80dB(A)) and the upper action level (85dB(A)), we provide personal hearing protectors upon request. At and above the upper action level, their use is compulsory and Hearing Protection Zones are therefore designated and signed.

Hearing protection has been selected as a result of the noise assessment to ensure that it provides the level of noise attenuation required. Employees who wear it, are instructed in its correct use and on the storage, maintenance and replacement arrangements. They are also instructed in noise hazards and the reasons for the noise controls and wearing hearing protection. For all employees who work in the areas described, regular audiometry testing is provided via 3-year CBH medicals. For employees appointed to begin work in these areas or undertake these activities, audiometry is undertaken at the start of employment in the role.

Noise ACOP/Rules

As well as the above control measures, it is everyone's duty to always follow these golden rules on noise when going about your daily tasks:

1. Only operate company machinery or vehicles within the sites operating hours (SWQ 0630-1700 Mon-Fri 0630-1300 Sat) (MHR 0645-1700 Mon-Fri 0645-1300 Sat).
2. Always let the transport office know if you have been asked to start early or are going to be running late and therefore cannot avoid making noise outside of normally permitted times.
3. Enter and leave vehicles and premises as quietly as possible at all times but particularly if starting early or finishing late.
4. Avoid idling and obey the rules within our anti-idling policy.
5. Avoid residential areas from you schedule before 9am where possible.
6. Avoid having two-way radios and other noise producing technology at high volumes in highly populated areas.
7. Ensure that excessive revving of the engine does not occur.
8. Avoid reversing – keeping reversing to minimum is safer in terms of manoeuvring physically but it also reduces audible warning messages.

It is important that we do not cause nuisance through noise pollution. A good relationship with our neighbours and communities will help us to maintain our operator's licence without complaint.

14. Carriage of Dangerous Goods

Carriage of cylinders by road

Everyone carrying gas cylinders in a vehicle should follow basic safety requirements. Drivers, should be trained in:

- the associated hazards and dangers of the
- goods safe handling of gas cylinders
- emergency procedures and the use of fire-fighting appliances

All training should be recorded and kept by both the employee and employer.

The training should be periodically supplemented with refresher training to take account of regulation changes and should be verified upon commencing a new employment.

Vehicles used for the transportation of gas cylinders should be open. If this cannot be achieved the vehicle should be well ventilated. Toxic gases must not be carried in a closed vehicle unless the vehicle has been specifically designed for the purpose.

A 2kg fire extinguisher is required on all vehicles carrying gas cylinders to fight engine and cab fires.

Cylinder valves must be closed whilst in transit and any equipment disconnected.

Cylinders should be secured properly and should not project beyond the sides or ends of the vehicle.

Cylinder labels are attached to all BOC cylinders. The label is produced in accordance with the current legislation. These labels must never be removed or defaced.

In addition to these general requirements, you may need to make specific provision if your load is above a certain threshold.

It is each driver's responsibility to know whether the load they are carrying is above the threshold.

Carriage of cylinders in the works

Movement of cylinders within the works boundaries should be carried out with the same care as when moving them on the general highway.

Cylinders must be properly secured when being moved and, if transported in a van, precautions must be taken to avoid a build-up of gas which might affect the driver.

Approved by J Paine, Managing Director

Signed:



Reviewed by J Suttle, Operations Director

Review date: 12th Jan 2023

Date of next review: Jan 2024

Revision History (Version Control)

Status	Date	Reason
Issue 1	Jan 21	Initial document, reformatting previous disparate policies and procedures into a single document with clear division and chapters related more directly to the current FORS standard. Addition of Noise, Coupling and Uncoupling, Lone Working ACOPs
Issue 2	Jan 22	Additional wording on licence checks, hierarchy of road users, vehicle security and emissions zone charges.
Issue 3	Jan 23	No significant changes