

HSE consultation on the revised INDG382 Driving at work: Managing work-related road safety

Response from Brake, the road safety charity

16 August 2013

Brake

[Brake](#) is an independent charity working across the UK to make roads safer, prevent road death and injury, and care for victims. Brake carries out research into road users' attitudes and behaviour in relation to road safety, engages schools and communities to spread road safety education, and supports communities campaigning for road safety. Through its Fleet Safety Forum, Brake disseminates international research, guidance and case studies to fleet and road safety professionals. It runs fleet safety training events, and an annual award scheme to recognise companies that have made exceptional progress in fleet safety and enable us to collect best practice case studies. Brake is also a national, government-funded provider of specialist support for people bereaved and seriously injured in road crashes, running a national helpline and providing packs that are handed to bereaved families by police following every road death.

For more information contact Ellen Booth, senior campaigns officer, on ebooth@brake.org.uk or 01484 550067.

Response summary

Brake welcomes the review of HSE guidance on managing work-related road safety, and agrees this improves the previous guidance by adding more examples of the types of activities involved in road-risk management. However Brake believes this guidance could be improved further, and outlines how below.

Brake acknowledges the ongoing importance of this guidance to fleet safety in the UK, as it helps to convey the importance of fleet risk management to health and safety at work. Brake would encourage the HSE to proactively promote the revised guidance as widely as possible to organisations that operate fleets of all sizes and types, to encourage more operators to adopt the essential policies and practices it advocates. Brake would welcome regular updating and promotion of this guidance to ensure its continued relevance to and use by the sector.

Language

Brake has a policy against the use of the term 'accidents' in relation to road crashes. Road crashes are not accidents; they are devastating and preventable events, not chance mishaps. Calling them accidents undermines work to make roads safer, and can cause insult to families whose lives have been torn apart by needless casualties.

Many organisations and practitioners working in road safety have recognised the detriment caused by the term 'accidents' and replaced it with more helpful terms such as crash or collision. Brake urges the HSE to follow suit to better promote constructive attitudes and approaches to road safety and convey the message that death and serious injury from at-work crashes is preventable through good road risk management.

Brake also suggests the language in this guidance should be more directional, rather than simply outlining questions employers can consider when designing or improving company road-risk management. Brake would recommend stronger language such as 'should' or 'must', especially where steps are essential for

ensuring compliance with the law. This would help readers identify policies and practices they should prioritise, and understand the importance of these.

Structure

Brake recommends clearer integration of the two sections 'How to manage work-related road safety' and 'Are you managing work-related road safety effectively?'. It would be beneficial for it to be made clear how the second section fits with the first, for example, referencing the second section as a source of information on the types of 'do' road risk managers should be undertaking.

Additional content on technology

It would be useful to include reference to telematics systems and other technology that can aid road risk management, such as through aiding the collection and analysis of data on journeys and driver behaviour and targeting interventions to reduce risk. Telematics systems have developed significantly since the previous edition of Driving at work was published and Brake is aware of numerous examples of fleet operators making use of such technology to considerably reduce their incident rates.

Best practice case studies

Brake urges the HSE to include a small number of best-practice case studies in the guidance. It recommends these be included in the section on the benefits of managing work-related road safety, to show how companies have reaped the rewards of reduced road risk and motivate readers to do the same. These case studies should include enough detail so the reader can understand what the problem was, what action was taken, what was achieved and the benefits derived, such as reduced insurance premiums. Brake regularly produces and disseminates best practice case studies through its Fleet Safety Forum, which we include in guidance reports and events and provide to our subscribers, often based on our award winners. We understand that these are greatly valued by employers and would be happy to provide examples of these for use in this guidance, if appropriate credit was given.

Signposting

Brake recommends signposting its not-for-profit Fleet Safety Forum, as a source of expert and comprehensive knowledge, guidance and resources on managing road-risk, run by Brake. Specifically, it would be useful to reference the Fleet Safety Forum as a service by Brake in the 'other useful contacts' section, linking to www.brake.org.uk/employers). In addition, the Fleet Safety Forum has been funded by the Department for Transport to deliver a programme of seminars and webinars, and produce a free, comprehensive guidance report (due for publication in March 2014), specifically geared at organisations with less knowledge and experience in road risk management, especially SMEs. This report will give advice on implementing essential policies and practices (including sample policies and best practice case studies), getting buy in from the board on road risk management, and developing a road safety culture. Brake would recommend this free report be included in the further reading section, stating that it is available by emailing forum@brake.org.uk. The report will also be freely available to download on Brake's website.

Brake also recommends signposting to www.fleetsafetybenchmarking.net. This is a project involving more than 1,000 organisations, allowing them to compare their road risk management practices and identify gaps. It is a useful tool for organisations to see in which areas of road risk management they could improve, and it is also beneficial for organisations with little experience in road risk management to identify the gaps they need to fill and basic requirements they should address. The project has support from a range of partners, including Brake, The Department for Transport, ETSC, RoadSafe, PACTS and IAM.