

Management of Occupational Road Risk Policy

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NHS Shetland Document Development Coversheet

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1. Introduction

In NHS Shetland we recognise the risks posed from occupational road risk and driving on business use in the furtherance of NHS Shetland goals and objectives. This policy has been developed in accordance with the relevant legislation, in particular:

- Health and Safety at Work etc Act 1974;
- Management of Health and Safety at Work Regulations (1999);
- Provision and Use of Work equipment Regulations (1998).

NHS Shetland has also produced a Workplace Transport Management Policy that supports and enhances this Policy.

Although an organisation-wide approach has been established, detailed arrangements for controlling occupational road risks remain the responsibility of Directors, Heads of Service and operational managers. All departmental health and safety control books should deal with the driving at work risks arising in the course of the work of the department.

This policy and its procedures have been developed and agreed through the local Partnership Forum.

2. Definition of work-related driving (occupational road risk)

NHS Shetland defines work-related driving as: All staff, who, during the course of their employment, manage vehicles or staff who drive, or who themselves drive a vehicle on behalf of NHS Shetland. This policy applies, whether the vehicle is driven on the public highway or on Health Board premises. Normal commuting journeys to and from the workplace are excluded from this policy.

3. Principles

Shetland NHS Board is committed to applying a safe system of work to all road risk situations that involve driving a vehicle, either NHS Shetland owner or staff owner private vehicles on NHS business.

We are committed to eliminating, so far as is reasonably practicable, driving at work tasks which incur a significant risk of injury, or otherwise reduce the level of risk to the lowest level reasonably practicable. To facilitate this we are committed to providing:

- risk assessment;
- appropriate road risk training;
- appropriate information and instruction;
- guidance on site.

This policy will be reviewed every three years, and registered holders of the Health and Safety Control Book will be notified of amendments.

4. Policy aims

This policy aims to:

- meet the general commitments to the health and safety of staff described in the Risk Management Strategy and Health and Safety Policy;
- eliminate driving for work which could cause injury, wherever this is reasonably practicable, and reduce risks to the lowest level reasonably possible;
- reduce the risk of unnecessary occupational road risk by making sure that risk assessments are carried out and that vehicles / equipment are appropriately evaluated;
- make arrangements for putting the policy into practice and make sure we make improvements in controlling the risks created by occupational road risk;
- contribute to helping staff who have been involved in a driving adverse incident; reinforce the responsibilities of general or directorate managers and heads of departments for occupational road risk activities within their areas of responsibility;
- and keep to occupational road risk professional guidance.

5. General strategy

Our strategy for occupational road risk reflects the scale of the problems in this respect. Responsibility for risk assessments and implementing control measures rests with line managers with advisory input from Human Resources, Health and Safety and Estates, as appropriate.

The strategies for reducing occupational road risk are as follows:

- The multi-disciplinary Health, Safety and Wellbeing Committee will review and oversee how the policy is put into practice. The Health and Safety Lead will advise this Committee on corporate occupational road risk management strategies. Wide-ranging risk assessments must be carried out by line managers and heads of department of all hazards associated with driving at work tasks if there may be a significant risk of injury. There needs to be a plan for putting any action into place. The plan will aim to reduce the risk of injury within occupational road risk operations by:
 - identifying priority risk areas;
 - helping staff understand the importance of keeping their vehicle in a road worthy condition;
 - encouraging safe and defensive driving practices;
 - adapting to changing seasons and driving conditions or reorganising work practices: and
 - Prioritising staff groups for training programmes, and refresher training provided as appropriate. Data which is collected should be used to monitor the policy's implementation.

6. Occupational road risk assessment and risk identification

To assist line managers meet their obligations in relation to the management of occupational road risk, a generic occupational road risk assessment is available. This assessment processes

enables occupational road risk tasks to be risk profiled at departmental level and then target identified risks in priority order.

Where a control book owner identifies outcomes above 'Low Risk', a more specific and detailed occupational road risk assessment must be made to further evaluate the task and consider potential enhanced control measures to eliminate or reduce the risks.

7. Responsibilities

7.1. Chief Executive

The Chief Executive in line with the Scheme of Delegation, has overall accountability for ensuring that the organisational structure, arrangement and resources exist to implement this policy, its objectives, and associated plans to ensure that health, safety and welfare of staff employed by NHS Shetland and all persons (e.g. patients, visitors, contractors) liable to be affected by the activities of NHS Shetland.

In practice the Chief Executive will discharge this responsibility by delegation to the Directors and then through their line management structures.

7.2. Health, Safety and Wellbeing Committee

The Health, Safety and Wellbeing Committee, chaired by the Director of Human Resources and Support Services, will act on behalf of the Chief Executive in overseeing how the policy is put into practice and meeting the aims set.

The Health and Safety Lead provides the Committee with a source of expertise in risk compliance for occupational road risk within NHS Shetland.

The Health and Safety Lead will advise the Committee on strategic developments necessary to reduce occupational road risk to meet legislation and best practice.

7.3. Health and Safety Lead

The Health and Safety Lead is part of the Human Resources and Support Services Directorate, and is responsible for:

- advising managers and staff about their legal obligations and for providing specialist advice and support in relation to the management of occupational road risk operations; and
- Investigating Datix incident reports relating to driving at work risk issues.

7.4. Executive Management Team (EMT), Chief Nurses and all Heads of Departments

The members of EMT, Chief Nurses and all Heads of Departments are responsible for:

- noting the initial risk assessments carried out and any amendments or additions made, putting the recommendations for eliminating or reducing risk into practice as far as is reasonably practicable, following the initial assessment or annual review;
- recording details in their departmental health and safety control books of their arrangements for occupational road risk, outlining appropriate responsibilities, channels of communication and monitoring;

- making sure that appropriate measurements of fitness criteria are set for new staff and that these are used effectively by Occupational Health Service (OHS) when carrying out pre-employment screening;
- taking account of risks created by occupational road risk in the design of new facilities, buying of equipment or new work practices and take advice from the Health and Safety Lead;
- and maintaining monthly statistics on all road risk incidents and the extent of any sickness absence which may be caused as a result.

7.5. Transport Manager

The Transport Manager (Director of Finance) is responsible for ensuring that this policy once approved is implemented throughout NHS Shetland.

7.6. Line managers

Line managers are responsible for:

- identifying any driving at work risks within their department and, as appropriate, working with the Health and Safety Lead to identify measures to reduce risk;
- making sure that Datix incident reports are completed for all injuries or near misses involving occupational road risk, and keep up-to-date details of all incidents which occur in their area of responsibility;
- making sure that occupational road risk, risk assessments are carried out, updated as necessary, reviewed every year, and details kept;
- being fully aware of the issues highlighted within current road risk assessments carried out for their areas; putting into practice, as far as reasonably practicable, with the resources available, any control measures identified through risk assessments or required under this policy;
- recording details of action plans for reducing risk and passing information to general managers to make sure they prioritise risk control measures;
- taking account of the risks created by occupational road risk in the design of new facilities or work practices, and taking advice when necessary;
- to make sure that all staff are aware of the Policy and receive the relevant information, instruction and training as soon as reasonably possible after starting their jobs and that they are updated regularly;
- maintaining local records of staff who receive training, both at induction and for update sessions;
- recommending referral to Occupational Health when appropriate, and taking advice on changing tasks or a phased return to work when necessary;
- making sure that new members of staff in their ward or department have been passed by the OHS as fit for the job.
- Ensure all pool vehicles under their control are serviced and maintained in accordance with NHS Policy and the manufacturer's instructions.

- Ensure all pool vehicles under their control are pre-user inspected by each driver, prior to taking the vehicle onto the public highway.

7.7. All staff

All Staff are responsible for:

- taking reasonable care for their own safety and that of colleagues and patients;
- making full and proper use of equipment provided;
- following safe systems of work shown in the risk assessments;
- ensuring they have an appropriate and current driving licence to operate NHS or private vehicles and up to date Class 1 business use insurance cover for driving their private vehicle for work purposes.
- Any employee who drives on NHS business, MUST inform their manager immediately should they be banned from driving or have their licence suspended by the DVLA due to medical reasons, for example.
- following the precautions and procedures set up for avoiding or reducing the risk from occupational road risk and following the risk assessments and safe system of work:
- attending or undertaking training courses provided by the Staff Development Department at induction and further updates, following safe working practices for occupational road risk and asking for extra training if they feel that they need it;
- assessing the task before carrying out any driving at work activity to make sure enough precautions are taken;
- carrying out a few simple pre-user checks on the vehicle before beginning any journey to ensure it is road legal. This should include assessing the condition of the vehicle (lights, tyres, brakes, oil levels, windscreen washer fluid etc) weather conditions and route, and their own fitness to drive. When planning a journey, staff should follow the safest route available. In adverse weather conditions such as snow a risk assessment should be carried out and consideration given to postponing or cancelling a journey. NHS Shetland advises that drivers carry in their vehicle, a mobile telephone for emergency use, a first aid kit, food and drink as well as extra clothing for warmth in case of a vehicle breakdown in cold weather when there may be a lengthy delay before assistance arrives.
- reporting to their Head of Department any risks which they think have not been handled effectively;
- making sure that Datix incident reports are promptly reported and completed by following the procedure for all incidents involving occupational road risk; and reporting any problems or shortcomings in the risk assessment or safe system to their line manager.
- under the Road Traffic Act, drivers are legally responsible for their own actions on the road, for keeping to all traffic regulations and keeping up with changes to the Highway Code and other road traffic legislation.

7.8. Occupational Health Department

The Occupational Health Department is responsible for carrying out pre-employment screening and making sure that new staff are fit for the duties involved in their post.

They will discuss with the appropriate manager any risk relating to driving, which they consider to be significant.

All staff can consult the service, confidentially, on any aspect of health and safety while at work.

8. Training

The best way of reducing the risk from driving at work is by putting measures in place which reduce:

- the likelihood of being harmed through driving activities; and
- reducing the risk factors in driving at work tasks that remain.

Shetland NHS Board will provide information, instruction and training, which covers the principles of:

- legislation and local policy for driving on the public highway;
- defensive driving techniques;
- risk assessment and dynamic risk assessment;
- winter driving;
- fitness standards for driving on the public highway;
- E-bike rider safety.

It also:

- emphasises the practical application of these principles;
- gives guidance in the correct use of appropriate mechanical and technical driving aids; and
- ensures training is based on needs identified through risk assessment.

All staff will receive initial induction training before working for NHS Shetland. The length of the training at induction will vary according to the tasks in which staff are involved. Turas training modules on safe driving and Winter driving are to be completed as part of the staff induction process for any staff member who is likely to need to drive on business use either in their own vehicle or an NHS 'pool car'. This training can be found using the following link:

<https://learn.nes.nhs.scot/59437/nhs-shetland/essential-learning/safe/health-and-safety/safer-driving>

Staff will also receive annual refresher training as dictated by the risk assessment process.

Line managers will identify further training needs and appropriate training will be provided as required, which can be e-learning, face to face or a combination of these training methods dependent upon the training need.

9. Pool / e-vehicle use

NHS Shetland has a number of 'pool' vehicles, which are a mixture of Internal Combustion Engine (ICE), Hybrid and Fully Electric powered.

Prior to staff using these vehicles, it is essential that they are fully familiar with the specific vehicles controls, switchgear and general operating procedures for the particular make and type

of vehicle to be used. All drivers of pool vehicles must inspect the vehicle for road worthiness to ensure they are not breaking the law whilst driving the vehicle on the public highway and that they are not placing themselves in danger by operating an unsafe vehicle.

If “All Season” tyres are considered appropriate for driving over the winter period in Shetland, all 4 tyres must be replaced with the same make/type of tyre. Mixing ‘all season’ and ‘normal’ tyres on the vehicle creates differing levels of grip across the vehicle, which creates an unsafe condition.

There are number of pool e-bikes within NHS Shetland for use by staff. Induction training is provided on the use of this type of semi-battery powered vehicle and cycling road safety training can also be provided, if necessary. Contact Monika Farkas, Workplace Engagement Active Travel Project Officer for more information (monika.farkas@shetland.nhs.scot).

More information is also available on the NHS Shetland Intranet:
<https://intranet.nhsshotland.scot.nhs.uk/staff/eBikes/index.html>

10. Monitoring and reviewing

Outcome and indicators which may be used to evaluate this policy include:

- Is the policy effectively as of widely communicated?
- Are staff aware of the policy and its implications?
- Is the policy addressed in local and organisational induction programmes?

This policy will be reviewed three years from its effective date by the Health, Safety and Wellbeing Committee, reporting to Shetland NHS Board.

11. Dissemination and communication

The policy is made available via the Intranet to ensure ease of access for all staff. Paper copies of the policy are also available in some departments where it is more practical to make this information available in hard copy. Risk assessments are contained in departmental control books and staff must sign as reading and understanding the risk assessment contained therein.

A Driver’s Handbook/Safe Working Practise has been completed to complement this policy, a copy of which is available for all employees to read and it is suggested a copy of this handbook is kept in the vehicle as an aide memoir. This booklet details a common sense approach to road safety, provides information on safe driving considerations and NHS Shetland’s expectations of drivers while operating either a private or NHS vehicle on business use.

Appendix 1 – Legislative and professional guidance documents

Health and Safety at Work etc Act (1974),

Management of Health and Safety at Work Regulations (1999)

Provision and Use of Work Equipment Regulations (1998)

Road Traffic Act (1988)

NHS Shetland - Driver Handbook / Aide Memoir (2022)

Workplace Transport Management Policy (2022)