

The changing nature of driving for work and questions for safety policy
and practice

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A paper for PACTS and the Transport Safety Commission’s Work-related Road Safety Forum



1. Who needs to manage occupational road risk?

According to the Health and Safety Executive (HSE, 2014) the management of occupational road risk (MORR) applies to 'any employer with employees who drive, or ride a motorcycle or bicycle at work, as well as self-employed people. It also applies to those using their own vehicle for a work-related journey.'

2. The casualty problem

A strategic review of the management of road risk (Helman, Christie, Ward et al 2014) have showed that between 2006-2012 there has been little change in the number of road casualties associated with 'driving for work' which accounted for just under 30% of fatalities and just over 22% of serious casualties.

The reports showed that drivers themselves (16,270 drivers in 2012) are injured in about 30% of collisions, but it is other road users who are more often killed or injured by at work drivers (25,484 other road users in 2012) (Figure 1). This was particularly noticeable for fatalities where other road users were nearly five times more likely to be killed than a driver (87 drivers and 422 other road users). These figures need to be caveated by the fact that we do not know how reliable the 'driving for work' category is and what it covers (especially for car and van collisions).

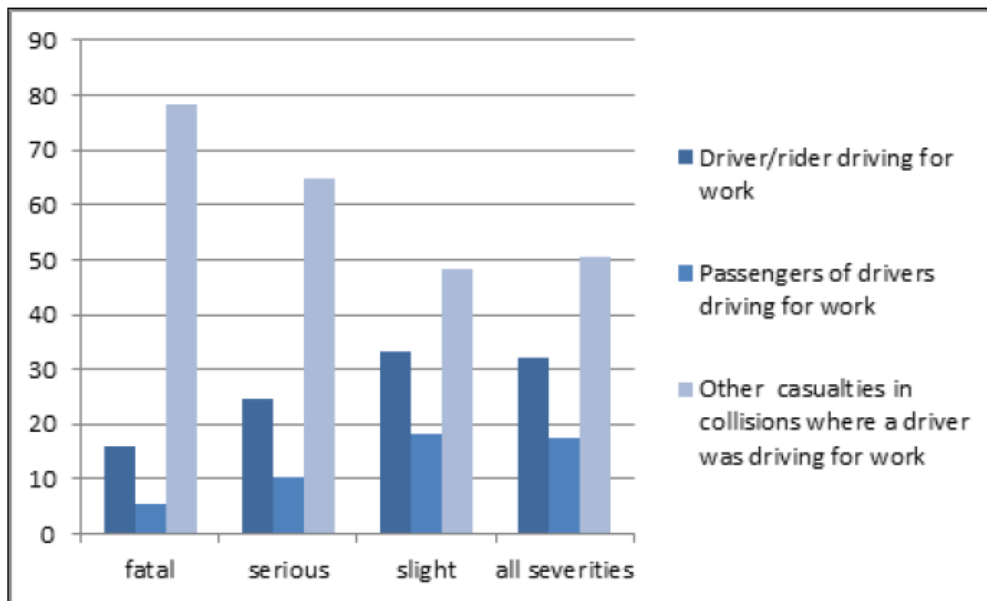


Figure 1: The percentage of drivers and riders driving for work, their passenger or other road users not in their vehicle who are killed or injured (2012) (Helman et al 2014).

3. Policy context

The road safety statement from the Department for Transport (DfT, 2015) 'Working Together to Build a Safer Road System British Road Safety Statement'¹ identifies *Encouraging better occupational road safety, fleet management and procurement* as an objective stating:

“Road safety is not just a matter for government and the public sector. The safe movement of goods and services is vital for the national economy and industry as a whole. As around a third of road traffic collisions involve a person at work, there is more that we can do working with industry and the rest of government to support and promote good practice in safer fleet management and occupational road safety.”

The DfT has stated that they will meet this objective in a number of ways by evaluating existing safer driving for work schemes to understand what works, specifically looking at the role of:

- telematics products,
- company reporting on collision rates,
- effective employee intoxication policies,
- procurement of safer vehicles,
- good practice relating to vehicle design and driver training,
- driving techniques and behaviours which are not only safer but also more fuel efficient.

4. Working in partnership

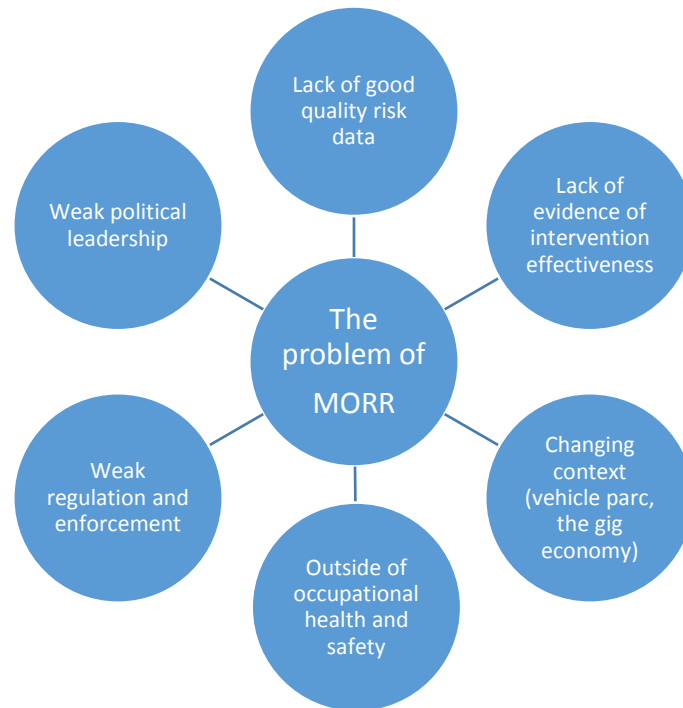
The Department for Transport has identified the vehicle leasing sector as a key collaborator 'as it accounts for one tenth of cars and up to one quarter of Heavy Goods Vehicles (HGVs) on our roads'. In addition, fleet buyers are identified to encourage faster take-up of the latest safer designs. The Department for Transport has established a multi-agency road safety delivery group – but it is not clear who the members are or whether employers' organisations, insurers and the Health and Safety Executive are represented.

5. Recommendations of the Strategic Review report/ Transport Safety Commission

A range of research projects, including most recently the TRL/UCL/RoSPA Strategic Review report² have identified a number of areas which need to be addressed based on analysis of current problems, as shown in the diagram below.

¹ <https://www.gov.uk/government/publications/road-safety-statement-working-together-to-build-a-safer-road-system>

² <https://www.rospace.com/rospaweb/docs/Advice-Services/Road-Safety/morr-strategic-review.pdf>



These areas are addressed in the sections below.

Lack of good quality risk data

Understanding risk

We do not have estimates for the numbers of people who drive for work which means it is difficult to estimate fatality rates per 100,000 workers or working drivers. The Safety Commission report³ (Transport Safety Commission 2015) highlighted that the risk of driving a heavy goods vehicle for work is comparable to other high-risk occupations:

“The HSE have estimated the fatality rate for drivers of heavy goods vehicles (HGVs) over 7.5 tonnes to be 4.4/100,000 HGV Drivers (based on 5 year average 2006/07-2010/11 with a 5 year average of 12 fatalities a year) which is second only to agriculture with a death rate of 10.3 per 100,000 workers over the same period”.

How we compare to other countries

Currently, we do not have comparative data on work related driving risk to compare our performance with that of other countries such as the Netherlands or Germany. In 2017, the European Transport Safety Council are set to publish a Work Related Road Safety Flash under its Performance Indicator programme – this will enable a comparison of UK work related safety with other European countries. This initiative will provide an opportunity to explore how UK data compares with other countries and whether or not data are or can be ‘harmonised’.

³ http://www.pacts.org.uk/wp-content/uploads/sites/2/TSCResponsibility_LowRes%20COMPLETE%20FINAL.pdf

Key questions to address:

- Is the risk of a collision by 'at work' drivers higher than or about the same as those driving for non-work purposes?
- What are the circumstances in which vulnerable road users are injured by people driving or riding for work?
 - ❖ We need to know 'Who (age, gender), where (rural/urban), when (time/day/month) and why (contributory factors)'?
- What are the circumstances in which drivers or riders 'at work' injure themselves?
 - ❖ We need to know 'Who (age, gender), driving or riding what (type of vehicle), where (rural/urban), when (time/day/month) and why (contributory factors)'?
- What could we learn from other countries and what does a harmonised dataset across Europe look like?

Implications for policy:

- A working group should be set up to enhance the data on work related road safety including multiple data sources such as STATS19, the Labour Force Survey, RIDDOR, local Accident and Emergency statistics, and information from insurers and from the NPCC (formerly ACPO) National Roads Policing Intelligence Forum (NRPIF).
- A Periodic review of serious and fatal collisions in order to understand the circumstances in which drivers and riders and vulnerable road users are injured in collisions.
- Government should require HSC/E employers have to report on the RIDDOR database or an independent national register when someone has been injured on the roads whilst driving for work, or when someone driving for work injures a member of the public.
- An indicator for driving for work should be part of a national road safety strategy.
- There should be stronger regulation to create more substantial fines for large fleets that have insufficient management of work related road safety.
- The government should work with the European countries to agree common dataset

Lack of evidence of intervention effectiveness

A review in 2011⁴ concluded that only a handful of interventions that were designed to improve work related road safety had been properly evaluated. The Strategic Review (Helman et al, 2014) concluded that little has changed, despite the promise demonstrated by several approaches based on telematics systems. The promise shown by telematics systems is somewhat tempered by the reluctance of insurers and providers to allow open access to their data because of its commercial sensitivity.

Key questions to address:

- What are the barriers to evaluation of interventions?
- What are those interventions that show most promise, in terms of their theoretical plausibility?
- What is the most efficient way to introduce interventions into the management of road risk in fleets?
- How can the research community work with insurers and businesses to develop and apply formative, process and outcome evaluation methods to enhance the evidence base? If

⁴<https://www.iosh.co.uk/~media/Documents/Books%20and%20resources/Policy%20and%20Consultation/Work%20related%20road%20safety%20literature%20review.pdf?la=en>

telematics suppliers will not engage with this process, can the research community seek funding for their own telematics data and develop their own risk algorithms that are then used as open source research tools?

Implications for policy:

- A research programme should be developed to explore the potential role of telematics as a tool for managing risk and its acceptability and usability especially among small enterprises and owner drivers.

Changing context

Vehicle parc

The vehicle parc is changing. Against a backdrop of fewer and larger HGVs, there is an increase in the number of vans. According to DfT statistics, van drivers are more likely than car drivers to speed, to use a handheld mobile phone, and to avoid wearing their seat belt. Company car drivers (the basis of many of the earlier estimates of risk for at-work driving) are less common now, and the extent to which grey fleet vehicles represent greater risk is unknown. Another unknown is whether the risks that may be associated with other modes of transport (for example public transport, or cycling and walking) are also within the remit of work-related exposure, and whether they are greater or lesser than driving risks.

Key questions to address:

- What other behavioural and operational (e.g. time of day, type of road) differences are there between occupational drivers of different vehicle types?
- How do grey fleet drivers differ from drivers of other work vehicles in their risk?
- What are the risks for different groups of drivers such as those involved in deliveries by HGVs and light vans, public transport and construction drivers?
- What are the risks associated with other modes such as motorcycle riders and cyclists?

Implications for policy:

- A research programme needs to be developed to explore the relative risks experienced and created by drivers of different types of vehicles for different types of work. Research could focus on quantitative analysis of police recorded data in more depth and using qualitative research to explore what drivers feel are the main risks and how they manage them (or not).

The 'gig' economy and lifestyle couriers

The growth of digital platforms accessible via smartphones are transforming the nature of work and giving rise to new independent ways of working. The gig or sharing economy describes this new trend in work. The gig economy involves people who do not get paid a salary but get paid per gig - similar to a 'piece rate' whereby service providers are linked to service users via an app. Examples of this type of employment are Uber (taxi service, food delivery) and Deliveroo (food delivery). Drivers and riders who earn money in this way are often referred as lifestyle couriers or workers.

There is growing action to regulate these forms of employment to provide workers' rights however little is known about how health and safety is embedded in these types of employment and whether workers are provided with training or are required to have training. The new inquiry by the Business,

Energy and Industrial Strategy Committee: “The future world of work and rights of workers”⁵ launched in December 2016 identified questions about employment rights but none about health and safety.

An international survey by the McKinsey Global Institute (MGI) (2016)⁶ estimated that 162 million people worldwide are employed as independent workers with official statistics suggesting that there are five million such workers in the UK. The MGI report concluded that whilst these independent workers participate by choice and enjoy the flexibility and independence of such work there is a policy need to resolve the problems of employment rights and access to training.

Given that many of those working in the gig economy are independent workers who provide transport based services - driving or riding- it seems critical to understand the health and safety issues around such employment. There are many health and safety issues to be addressed in such ‘gig’ employment. For example, evidence has shown that there is elevated risk for despatch riders/couriers⁷ such risks may also be experienced by gig workers who are offering transport based, time pressured services.

Key questions:

- How many workers are involved in transport based gig economy?
- How are or can they be represented in the casualty report?
- What sort of health and safety training do they have or are they provided with?
- What road casualty risks (or near misses) are associated with workers and their passengers (where applicable) in the transport based gig economy?
- Many of the transport based ‘gig’ services such as Deliveroo are time pressured and occur at night (and delivered by people who also work during the day) - what do we know about the role of fatigue in the safety of such services?

Implications for policy:

- The DfT needs to commission research into understanding the safety issues around unregulated transport based work in the gig economy
- The DfT needs to work with coordinators of digital platforms such as Uber, Deliveroo to encourage uptake of safety training.

Risks associated with outsourcing of transport services (emerging issue)

There is an emerging problem of risks outsourcing of transport services and whether health and safety training is embedded in the commissioning process. There was a recent news story that the drivers of the Private Ambulance Service in Basildon, Essex only had one hour of training to drive

⁵ <http://www.parliament.uk/business/committees/committees-a-z/commons-select/business-energy-industrial-strategy/news-parliament-2015/the-future-world-of-work-and-rights-of-workers-launch-16-17/>

⁶ http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&cad=rja&uact=8&ved=0ahUKewiO0cuB1q3RAhUFPxoKHawbBgQQFgghMAE&url=http%3A%2F%2Fwww.mckinsey.com%2F~%2Fmedia%2FMckinsey%2FGlobal%2520Themes%2FEmployment%2520and%2520Growth%2FIndependent%2520work%2520Choice%2520necessity%2520and%2520the%2520gig%2520economy%2FIndependent-Work-Choice-necessity-and-the-gig-economy-Executive-Summary.ashx&usg=AFQjCNF7CmqvD0vA_JeibZBmmpTsYPGp4Q&sig2=mX0UNWB9GoipFvdL8uomow

⁷ https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0ahUKewi89quz1q3RAhVl6xoKHdP3AJAQFggdMAA&url=https%3A%2F%2Fosha.europa.eu%2Fen%2Ftools-and-publications%2Fpublications%2Fliterature_reviews%2Fdelivery-despatch-riders.pdf&usg=AFQjCNHJxs0S10hhwvCEcwTAR6I-iEDM_g&sig2=RcPivQNhvykygmU7N_fhlw&bvm=bv.142059868,d.d2s

under blue lights compared to NHS drivers who are trained for two weeks⁸. There is a need to understand where health and safety fits in the outsourcing of safety critical services.

Weak regulation and enforcement

It has been widely reported that occupational road risk is the ‘poor relation’ of occupational health and safety risk. The lack of reporting requirements alluded to in the ‘data’ section above is just one part of this. When businesses are engaged for their opinions on occupational road risk the constant feedback is that driving is simply not perceived as risky, and because of this and the lack of requirements and regulations it is simply not managed as well as general workplace health and safety.

A startling example of this can be seen in the original CLOCS (Construction Logistics and Cyclist Safety) project funded by TfL⁹. It is an exchange between a researcher and a construction site sub-contractor:

Interviewer: “When they [drivers who serve your construction site] leave the site, do you see any responsibility for them driving safely?”

Respondent: “No”.

A similar conversational outcome relating to aspects of on-site safety (e.g. hard hats and other protective equipment) is unthinkable. This finding is not specific to construction. The weak regulatory framework around work related driving exacerbates the situation. For example there is no investigator for work-related road collisions. In some cases (for example those driving vans, which do not require an operator licence) there is no need to demonstrate competence. While corporate manslaughter legislation is in place, it does not appear to be widely used for cases involving work-related road collisions and injuries.

The key focus of much applied work in this field (e.g. CLOCS) has been to address this imbalance between work-related driving risk and general health and safety.

A further area that needs improvement is enforcement and following-up of organisational bad practice.

Key questions to address:

- How can ORR be elevated to the same level of importance as H&S?
- How can we get the message across that driving is no different to operating any other kind of heavy equipment at work?

Implications for policy:

- Employers should be encouraged to follow the HSE guidance and to adopt and follow ISO 39001 – Road Traffic Safety Management Systems. (A new ISO 39001 Start Up guide is in preparation which should help employers implement the standard.)

⁸https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0ahUKewi89quz1q3RAhVI6xoKHdP3AJAQFggdMAA&url=https%3A%2F%2Fosha.europa.eu%2Fen%2Ftools-and-publications%2Fpublications%2Fliterature_reviews%2Fdelivery-despatch-riders.pdf&usq=AFQjCNHJxs0S10hhwyCEwTAR6l-iEDM_g&sig2=RcPivQNhvykygmU7N_fhlw&bvm=bv.142059868,d.d2s

⁹ <http://content.tfl.gov.uk/construction-logistics-and-cyclist-safety-summary-report.pdf>

- Through enforcement the police can establish whether a driver is driving as part of work and liaise with their companies to improve the management of risk. This work could be funded from revenue from speed awareness courses.

Weak political leadership

Stakeholders engaged as part of the Strategic Review Report concluded that leadership was lacking in this area, especially by HSE and DfT, which are "...seen as the key organisations that can set the agenda for MORR going forward."

MORR may also be one area of road safety in which there is a genuine information deficit. People simply do not realise that work related driving can be risky. A range of awareness-raising initiatives are required.

Implications for policy:

- A national THINK! Campaign to raise awareness about risk factors of driving for work should be developed. This would provide some high visibility leadership around the issue. DfT should form a partnership with the insurance industry to co-fund this and other such campaigns, as has been achieved in other countries.
- A revived occupational road safety alliance has been formed and there should be an annual conference to raise awareness supported by business.
- The DfT, in partnership with the insurance industry, should develop a code of practice for managing occupational road risk.
- DfT should work with DVSA to develop a new module in the learning to drive syllabus on driving for work (targeting those risk factors that appear to be especially important such as fatigue, time pressure and distraction).

6. Closing thoughts

According to journey purpose data in STATS19, in 2014, road collisions known to involve work-related driving killed 547 people. This is likely to be an underestimate, given that for cars (which make up the vast majority of the vehicle parc) journey purpose data was listed as 'unknown' in around four fifths of cases.

The corresponding number of people dying in general work-related activity in the most recent data available from HSE is 265 (142 workers, and 123 members of the public). On this comparison work-related driving represents at least twice the injury burden of general work-related activity. Comparisons with numbers dying in other modes of transport (even if suicides are included in the rail figures) show a similar pattern.

The Government's identification in the road safety statement of *Encouraging better occupational road safety, fleet management and procurement* as an objective is to be welcomed, so long as it is backed up with the necessary actions and resourcing.