

APSE - Fleet Management & Transport Compliance



Compliance and Awareness

Margaret Simpson

Country Manager for Scotland

Membership Relations Manager Team
Policy Colleagues

Agenda



- Recent Technical Guidance
Changes to Guide to Maintaining Roadworthiness
- Operator License Awareness
O CRS score “changes”
- Working Time/Drivers Hours
Some Updates/Information

Recent Technical Guidance



- New version of Guide to Maintaining Road Worthiness
- **Main “differences/changes” include:**
 - • older vehicles and trailers
 - • safety inspection completion date
 - • safety inspection and repair facilities
 - • brake testing

<https://www.gov.uk/government/publications/guide-to-maintaining-roadworthiness>

Changes to MRw Guide....



Traffic Commissioners: *“**Nothing in this Guide is mandatory, but operating as outlined in this guide will ensure you meet the relevant conditions and undertakings on your licence**”*



The Guide now includes Case Studies to help explain various scenarios.

Changes to MRw Guide....

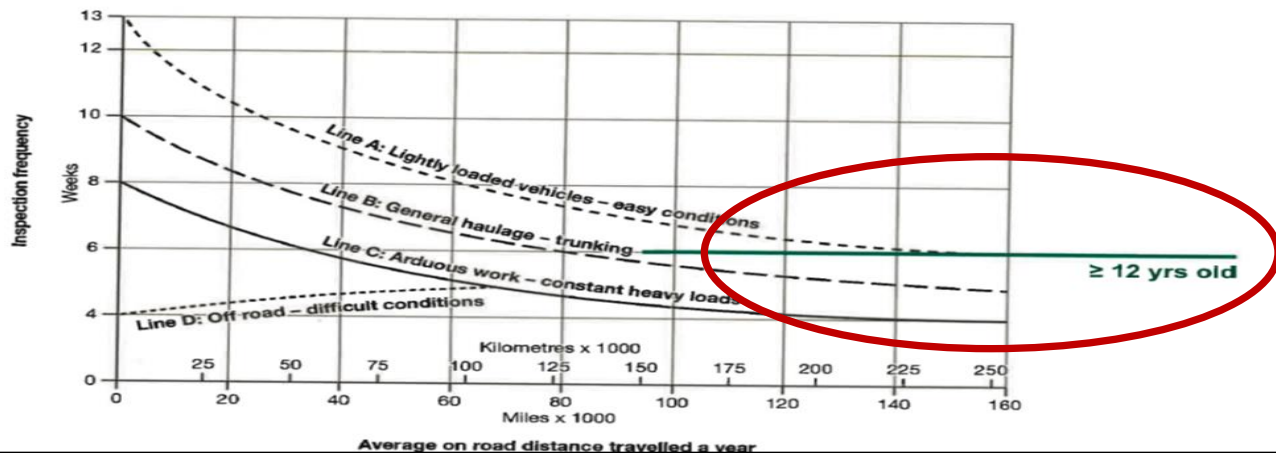


• Older Vehicles and Trailers: Safety Inspection Intervals

- 12 years or older, then the Safety Inspection interval should be no more than 6 weeks
- Regardless of work being done by vehicle

Annex 4

A guide to safety inspection intervals



Changes to MRw Guide....



- **Safety Inspection Completion Date**

“Which ever safety inspection interval is decided upon, the inspection frequency should not be extended without prior notification to the TC. The following safety inspection should be carried out *within* the specified weekly or mileage based time scale and not beyond”

So essentially, this means that an inspection can be carried out **during** the Calendar week it falls due..

- **Safety Inspection Completion Date**

From page 20 of guide, this is the section that refers to the safety inspection being completed within the week

- **Key Information**

- Which ever safety inspection interval is decided upon, these intervals **must not** be exceeded, To allow some flexibility with planning safety inspections it is recommended that the International Organisation for Standardisation (**ISO**) week numbering system is used, with this system the safety inspection should be completed within the relevant ISO week it falls. ISO defines the week as always starting with Monday through to Sunday. See Annex 7 for an example of a maintenance planner. See annex 4 for further guidance on SI frequency.
- Once established, operators wishing to change safety inspection frequencies, or on the basis on which the frequencies are determined, they must notify the Central Licensing Office.

Changes to MRw Guide....



- **Safety Inspection and Repair Facilities**

- Section 5 of the new guide

Inspection Facilities – minor changes

Entire Section on Brake Testing now included (details later on)

Drawing up a contract – “copy to be sent to Central Licensing Office without delay” (previously VOSA Traffic Office)

- Example Safety Inspection Report, now includes:

Tyre Pressure and tread depth

Indication that a defect was driver reportable

Changes to MRw Guide....



- **Safety Inspection and Repair Facilities**
- Section 6 : “Monitoring” much more detail now
 - **Monitoring of Driver Daily Checks**
 - **Annual Test Results :**
 - What does the annual test involve;
 - What happens at the end of the test;
 - What happens if faults are found;
 - Major defects;
 - If the vehicle fails test
 - **Operator Compliance Risk Score**

Specific recognition that experienced vehicle engineers and operators know what they are doing

Changes to MRw - Brake Testing



“It is **strongly** advised that a calibrated **roller brake tester (RBT)** is used at each safety inspection...”

It is acceptable to use an approved and calibrated Decelerometer to test vehicles without trailers

“Where it is **impracticable** to obtain a brake efficiency result on a safety inspection the brake performance must still be assessed by means of a **road test**”

Brake Testing



However, a road test method to assess the brake performance **for all** planned safety inspections **will usually be inadequate.**

Therefore it is normally expected that the vehicle or trailer should complete **at least three** successful **brake efficiency tests** spread throughout year **in addition to the annual MOT** test.

Brake Testing continued....



KEY INFORMATION:

“Where operators experience problems with braking performance either at annual test, roadworthiness inspections or through operational performance and fail to meet the standards outlined above, the Traffic Commissioner may take regulatory action.”

Operator License Awareness



Operator Compliance Risk Score

“Changes “ will not be published until end of May

Working Group has met; decided content is correct

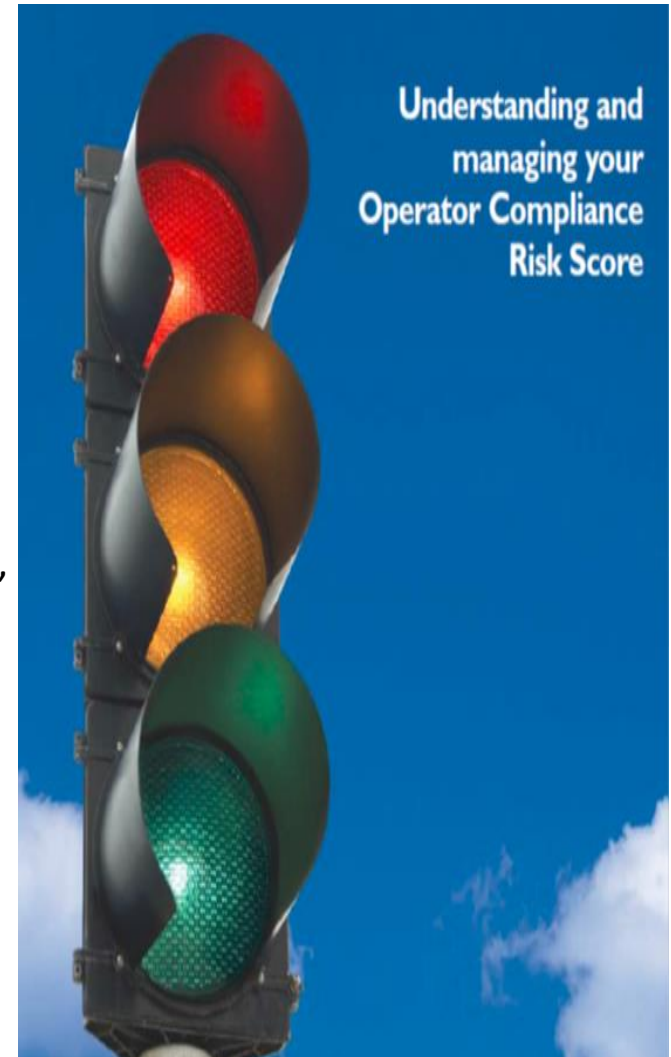
More about ease of access and how to access the information

Example – Operator with several O Licenses in one traffic area,
should not have to complete several requests for info

In theory one request for all information

Partly dependant on up-dating of DVSA systems

FTA Compliance Guide will be re-written once changes
are confirmed



Working Time/ Drivers Hours



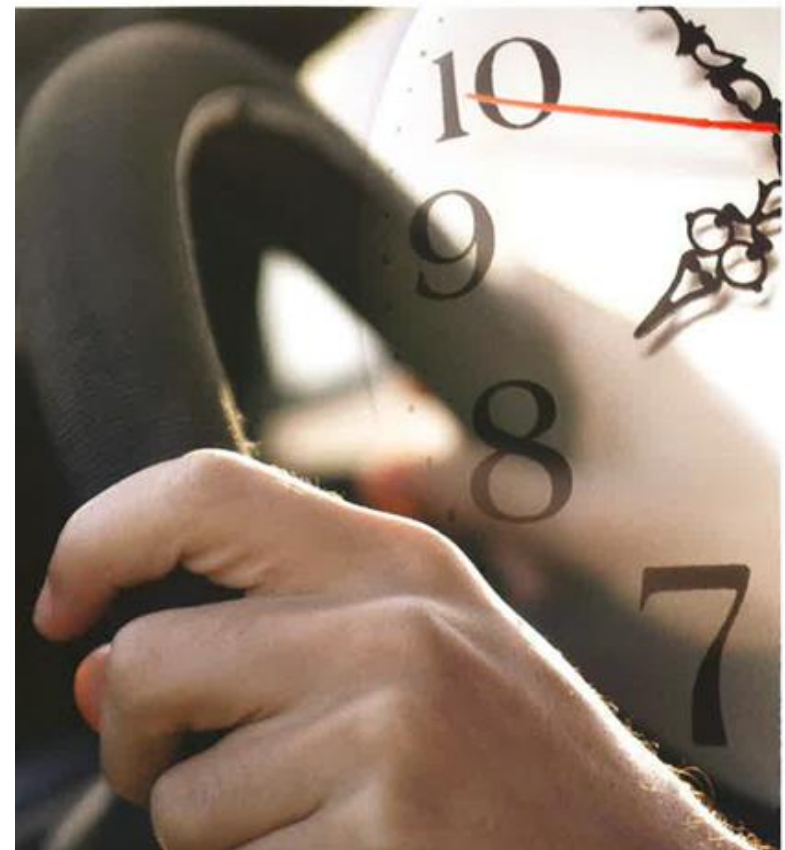
Obviously a HUGE area.....

Some specific areas that we
thought relevant for today:

DVSA clarification on Utility Services Derogation

New Drivers Hours/WTD Guide

Drivers' Hours and Working Time Rules



DVSA Clarification.....



The Driver and Vehicle Standards Agency has clarified which vehicle operations are eligible for the exemption from EU Drivers' hours rules for vehicles which are "used in connection with sewerage, flood protection, water, gas and electricity maintenance services".

DVSA has issued an advice note on what 'maintenance' means in this context and to explain which vehicle operations are exempt EU drivers' hours rules and which are not

"...for vehicles to qualify, they must be directly involved in maintenance work, where part of an existing utility infrastructure is being repaired or replaced. This would not cover vehicles used to install new infrastructure. For example, a vehicle involved in replacing an existing section of underground pipe would fall within the derogation; but a vehicle involved in installing a new underground piping system would not."

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/300271/eu-drivers-hours-exemption-for-maintenance.pdf

New Drivers Hours/WTD Guide



- Department for Transport creating new guide
 - Working Group: FTA/RHA/DVSA/DfT/CPT/Various Unions
 - Aim to Simplify
 - Side by side Comparison of EU Rules and WTD
 - First skeletal draft with working group as of 28th April 2014

- Looking at typical day:
 - Which “bits” count towards EU drivers Hours eg. Breaks
 - Which “bits” count towards WTD eg. Rest period

Contents of New Guide:

- Working Hours/ Shift Spread
- Breaks
- Rest Periods
- Enforcement
- Definitions

Es has asked, if there are any specific areas/scenarios that you feel should be included to get in touch with him directly

Under each section brief definition/overview and then typical examples

Any Questions.....



Margaret Simpson – msimpson@fta.co.uk – 07985-887-401
Es Sheppard – MAC – 0870 605 0000