# OVERVIEW DOCUMENT FORS V6.0



FLEET OPERATOR RECOGNITION SCHEME (FORS) CHT MANAGEMENT MANUAL Reviewed on: 31st August 2023 by: FORS Review team

Approved & signed off by: ......Jake Stevenson – National Transport Manager

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# Management

#### M1 – FORS Documentation

CHT have produced a bespoke 'FORS' manual, encompassing in hard copy form or by way of separate reference to a CHT secure data source all the required elements of the FORS standard for auditing purposes, a current copy of which is in this section of the manual.

Where CHT has made separate reference within this 'FORS' manual to a specific CHT data or document source, it is simply for ease of reference, with all such data sources and documents being legible and readily accessible via CHT databases, SharePoint, and / or held in hard copy file.]

#### **Documentation Review**

ALL CHT policies and procedures, risk assessments, safe systems of work ('SSoW') and work instructions, collectively referred to as "Documents" are all subject to an annual review and require sign-off by senior management. The Health & Safety Policy, for example, is signed by the Chairman after its review.

CHT Documents will be reviewed more frequently if needed (e.g., reflecting changes to legislation, from incidents and accidents arising and/or changes to working practices. ALL CHT Documents are subject to version control and record the names of both document 'Reviewer' and document 'Approver' and are dated.

# **Document (specific) Review**

### FORS Manual

The FORS manual itself will be reviewed **annually** by senior members of the CHT organisation to make up the 'FORS Review Team'. A further review of the manual will take place sooner than annually in the event of a significant change taking place (including reflecting any version changes to the current FORS standard).

As part of this review, the Company's 'H&S Policy', 'Drivers Handbook' (now incorporating 'Driving Standards'), 'Employee Handbook' and other <u>key</u> policy documents are appraised to ensure their continued compliance to the FORS standard (as revised) and all statutory requirements.

All such formal reviews are set to an 'Agenda' and 'Minutes' documented, copies of which are located in this section of the manual.

A copy of the FORS Manual is made available to 'Transport staff' via SharePoint, a soft copy filed on Drivers PC and a hard copy is retained by each 'Traffic Office' and is accessible by any interested party.

The next scheduled review of the FORS manual, if not sooner, will be on 1st September 2024.

### Company policies

The Company's 'Health & Safety Policy' is reviewed annually and signed off by the Chairman, Chris Hayter.

All other Company policies and procedures, risk assessments, training matrices / professional development plans and related documentation are reviewed and approved by senior management annually.

Following review, any changes needed are made expediently, with relevant documents updated (under document version control), re-issued and communicated to employees and made available on SharePoint - see M5 - Communication.

### Continuous improvement

It is Company policy and an established part of CHT's day to day operational 'Quality Management System' (or 'QMS') requirements, for all departments to continually review and evaluate its policies, working practices and written procedures (including all work instructions, risk assessments, staff training requirements etc.), to ensure that they are continually fit for purpose and adhere to best practice.

Most of such reviews will routinely take place without requiring the setting up of formal meetings.

Any updates and / or changes resulting because of such a review are communicated to management and staff (as appropriate) - see M5 - Communication. A copy of the Jervis 'Quality Management Guidelines' is in this section of the manual.

#### M2 - Records

#### Retention of Records

Described within the FORS manual under each of the various subject headings, the Company has set out how it manages and securely retains the documents, records and data relevant to the FORS standard needed for auditing purposes.

Where CHT has made separate reference within this 'FORS' manual to a specific CHT data or document source, it is simply for ease of reference, with all such data sources and documents being legible and readily accessible via CHT databases, SharePoint, and / or held in hard copy file.

All company records including (but not limited) to CHT policies, procedures, driver' hours, working time records, vehicle testing & licencing, vehicle checks & defect reporting, vehicle safety inspections and maintenance are easily retrieved and are retained by CHT for the required duration as determined and specified in the FORS Standard; specifically:

- 12 months for drivers' hours records
- 24 months for working time records
- 15 months for statutory annual vehicle tests (after their expiry date)
- 14 weeks for vehicle nil defects records or until the next vehicle safety inspection
- 15 months for records relating to vehicle safety inspections, defects and maintenance

HQ 'Central Records' office personnel directly manage and oversee 'Quality' on behalf of the Company, maintaining key document version control, document review / circulation, and overseeing effective communication of Company policies. CHT's 'Document Control Procedure' sets out the guidelines to ensure BRCGS compliance.

### <u>Information security</u>

The majority of records are retained electronically and are linked to bespoke Company databases, whilst related original hard copy forms together with relevant investigative reports are kept securely within 'Central Records', or within HR or simply retained at the 'front-end' Operational Offices, as is deemed appropriate to their importance, confidentiality and for ease of accessibility. Information is accessible through SharePoint / Office 365.

These bespoke databases provide an excellent source of data for CHT management, who can retrieve records easily, and by using 'segment analysis' can seek out trends and / or unusual occurrences requiring their further investigation.

All business-critical data is kept on the Company's main servers, which are themselves remotely backed-up each day as is a requirement of the Company's 'Disaster recovery & Business Continuity Plan'.

A non-exhaustive listing of commonly referred to data records held within 'Central Records', is in this section of the manual.

### M3 – Responsible Person(s)

### Responsible Person

**Jake Stevenson** who was appointed National Transport Manager in January 2022 and is directly responsible for all 'Traffic Office' and 'Workshop' Operations. Jake is a member of 'The Chartered Institute of logistics and Transport (UK)' and has achieved OCR Level 3 Certificate of Professional Competence in National: Road Haulage Operations.

Jake is the named **FORS Responsible Person**. Jake's pivotal role as 'Responsible Person' is further supported by:

**Paul Street** was appointed as Joint Managing Director mid 2023 following a senior management restructure where previously Paul was appointed the company's 'Commercial Director'.

**Andy Holligan** was appointed as Joint Managing Director mid 2023 as well as Paul Street, following a senior management restructure where previously Andy was appointed the company's 'Operation Director'.

Both Paul and Andy have the responsibility for the CHT fleet operations located 'North' (Skelmersdale/Lancs), 'South' (Witney/Oxon) and Lenham, Kent. Paul is named on both the 'Southern' and 'Kent' O Licences. Andy is listed as a named person on the 'Northern' 'O' Licence.

**Shift Managers** At each of these locations, Jake Stevenson is supported ('assisted') by a specialist Traffic Office team including 'Shift Managers', who themselves are responsible for organising delivery loads for a team of CHT employed drivers. Their brief is to fulfil CHT's delivery promise to its customers, whilst ensuring optimum vehicular utilization and maximising vehicular load efficiency.

Within the Traffic Office team, the 'Shift Managers' themselves are supported by a specialist 'Load Planner', and a small number of 'Admin' support staff.

Data source: Sage HR / Contract of Employment, Job Descriptions / Organograms
Data source: S: Schedules / Training Record (Induction, skill sets, training modules)

#### M4 - Staff Resources

### Organisation structure & Communication links

CHT organograms set out the various resources in place showing the links / structures between its senior management and its fleet operations located both 'North' and 'South'.

In the 'North', the Traffic Office (based at Skelmersdale) manages and control the day-to-day traffic operations of <u>both</u> the Skelmersdale and Heywood fleets.

In the 'South', the Traffic Office (based in Witney) manage and control the day-to-day traffic operations of the Witney fleet and liaise with 'Kent' (based in Lenham), who control their own daily traffic operations.

It is through these links / structures that procedural changes to the business are communicated, either as a direct individual or team meetings, or via written communication, or both.

CHT organograms are reviewed and updated to reflect significant changes in the Company structure and / or because of changes of personnel.

Organograms also record the named person within CHT with continuous and effective responsibility for meeting the requirements of the FORS Standard.

[\*refer also 'M5 – Communication']

# Resourcing & Recruitment

CHT are committed to ensuring that it has enough qualified, trained and experienced staff resources in place at all times to run its operation effectively and to meet customer expectations.

To achieve this, CHT has put in place a robust recruitment and selection procedure for new drivers and fleet related staff, a copy of which together with a copy of 'Driver Interview Questions' is contained within this section of the manual.

#### Prior to appointment

Driver qualifications (including any collision history and unspent convictions), their eligibility to work, their fitness to drive is all checked beforehand. At interview, prospective drivers are specifically asked to declare if they have had any collisions both at work and off-duty which involved their engagement with an insurance company and/or the police. Once licence details have been checked and confirmed as satisfactory, prospective drivers are then required to undergo and pass a 'Driver Road Assessment Test' with a qualified CHT assessor.

#### Once appointed

Newly appointed drivers and fleet related staff will receive full CHT induction training and 'on the job' skills training (as determined by the 'Training & Professional

Development Matrix') including FORS Professional Development training. All training undertaken is recorded on a 'Training Database', including refresher training.

### Responsibilities & Accountabilities

At commencement of their employment (and forming part of Induction), all CHT staff receive a copy of the 'CHT Employee Handbook'. In addition, CHT drivers receive a copy of the 'CHT Drivers Handbook' (which incorporates 'Driving Standards') and a copy of the DVSA 'Staying Legal' leaflet.

Both handbooks set out / communicate to staff what is expected of them in terms of carrying out their duties, their conduct, and responsibilities as an employee of CHT supplying services on behalf of its customers.

All CHT staff, including drivers receive a contract of employment which sets out and describes what is expected of them. Person and / or job specific responsibilities and authorities are set out in bespoke 'Job Descriptions', examples of which are included in this section of the manual.

### Contingency planning & Training

In practice, staff or skill shortages are largely avoided by good management and forward planning. Departmental numbers allow for, and staff are expected, to flex up or down according to customer and / or seasonal requirements.

CHT staff receive skills cross training which allows them to help, stand-in or cover for temporary absences such as sickness or holiday. Such training is recorded in the 'CHT the 'CHT Training & Professional Development Matrix', a copy of which is contained within this section of the manual.

Due to the very nature of CHT's ever changing operational requirements, due in part to changes in seasonal demand, by working in conjunction with its approved local Employment Agencies, CHT can flex up its staff numbers at very short notice.

[refer also 'D3 – Staff Induction' & 'D4 – Professional Development']

Data source: Sage HR / Contract of Employment, Job Descriptions / Organograms
Data source: S: Schedules / Training Record (Induction, skill sets, training modules)
Data source: S: Schedules / Training Record (Driver Assessment Test, Licences)

Data source: Office 365/SharePoint / CHT handbooks / Policies

#### M5 - Communication

### Communicating info: Vacant Staff Positions / Induction process

#### Vacant Staff Positions

Where a vacant position has been identified by the Company this is normally advertised (both internally / externally), set against a bespoke 'Job Description' detailing the role's primary duties and responsibilities. Examples of 'Job Descriptions' are included under 'M4 – Staff Resources'.

Those staff directly employed by CHT (as opposed to being hired as 'temps' through an Employment Agency) will receive a contract of employment or 'Statement of Terms & Conditions of Employment', which sets out the respective obligations of both the Company and the employee, a 'sample copy' of which is included under 'M4 – Staff Resources'.

#### Induction

At commencement of their employment with CHT, all staff (including drivers) will receive a full induction. During which they will receive training on health & safety at work issues and \*\*risks' and be informed of key Company policies and procedures and how to readily access these.

As part of the induction process, all CHT staff receive a copy of the 'Employee Handbook'. In addition, all CHT drivers receive a copy of the 'Drivers Handbook' (which now incorporates 'Driving Standards') and a DVSA 'Staying Legal' leaflet.

In respect of the 'Drivers Handbook', this includes as an appendix Risk Assessment No RA056 'General hazards & risks relating to drivers and their vehicles'.

These two handbooks together set out / communicate to staff what is expected of them in terms of carrying out their duties, their conduct at work and responsibilities as an employee of CHT supplying services on behalf of its customers.

The foundation of CHT's induction training is the Company's 'Health & Safety Policy Statement'. This statement is made available to all staff and displayed on all Company notice boards, and a summary page version is included in the 'Employee Handbook'.

At the completion of their induction, staff will sign off their induction summary initialling each of the modules they have received induction training for and confirming receipt of the 'Employee Handbook' and (for drivers only) the 'Drivers Handbook' and DVSA 'Staying Legal' leaflet. The driver induction form requires a declaration from the driver to sign that they acknowledge awareness of their individual responsibilities.

A copy of the Company 'Health & Safety Policy Statement', 'Employee Handbook', 'Driver handbook' (incorporating 'Driving Standards') and DVSA 'Staying Legal' leaflet can be found in this section of the manual.

[refer also 'D3 – Staff Induction']

### Communicating info: "On the Job Training"/ Refresher (Post Induction)

#### "On the Job Training"

Post induction training and when 'in-post', all staff will receive all relevant on-the-job training, together with refresher training tailored to the requirements of the Company, or the operational / departmental requirements within their specific area of work, and / or tailored to that individual's requirements (perhaps as a consequence of a return to work following absence, and / or following an accident or incident at work etc.).

\*The 'Training & Professional Development Matrix' (which includes FORS Professional Development training) determines all training to be undertaken by staff specific to their appointment. All training is subsequently recorded on the CHT 'Training Database'.

Where staff have engaged in organised refresher training or receive short 'crew talks' or 'Toolbox Talks', they will be required to sign an attendance sheet at the end of their training, making a declaration that they acknowledge awareness of their individual responsibilities. Examples of 'Toolbox Talks' and attendance sheet are included in this section of the manual.

[refer also 'D4 – Professional Development']

#### Operations / Department manual(s)

Each CHT site is required to set out its adopted policies and working procedures within an operation manual (or manuals), as deemed relevant to their own operation. Each manual is specific to that operation or department and will be tailored according to the business requirements at that location and include all relevant information including (but not limited to) risk assessments, policies, work instructions, and staff memos, as may be required to demonstrate best practice.

When 'in-post', staff will have ready access to all relevant information required to perform their duties.

Examples of driver related memos, risk assessments and policies are included in 'D6 – Health & Eyesight'.

# Communicating info: Company Policy Updates / Organisational Changes

Company policy updates or organisational changes and/or training requirements are communicated to all staff via:

- ✓ Company noticeboards (both general and driver noticeboard specific)
- ✓ Verbal communication in the form of 'team meetings', 'Toolbox Talks'
- ✓ Classroom training sessions (which will include a list of attendees)
- ✓ 'On the job' training
- ✓ Memos
- ✓ Electronic media, such as:
  - Emails

- Driver messaging (website, Samsara, mobile etc.)
- SharePoint / Office 365
- Drivers PC
- 'CH@T' an in-house produced newsletter for all CHT employees
- Information screens (strategically placed Traffic / Warehouse entrances)

... this list is not exhaustive.

Changes to policies or legislation that directly affect drivers are directly communicated, and where an update to 'Driving Standards' has occurred an updated 'Drivers Handbook' will be issued to all drivers, who are required to sign a declaration that they have received a copy of the updated Drivers Handbook and acknowledge their understanding of their individual responsibilities as a professional driver for CHT and will comply with Company policy/procedures at all times.

When information must be disseminated to more than one operational site, this is done vie email to Departmental Heads, or attached to employees' payslips, or a 'Crew Talk' may be held, at which the necessary attendance / sign off sheet will be prepared.

#### <u>Verbal communication within Operation / Department</u>

It should be recognised that the very activities carried out within the three CHT 'Traffic Offices' require that its staff to be dynamic, flexible and are able to absorb **verbal** instruction quickly in order to fulfil fast changing customer and / or operational requirements.

This is largely achieved via a 'Traffic' team meeting scheduled / held each day at 11.30am, which is video linked to and involves key members of the respective 'Traffic Office' teams (both 'North' and 'South').

It is at these meetings that most of the day to day 'Traffic' related operational issues are first raised, discussed, outcomes agreed, and actions implemented. Any significant changes of procedure arising from such meetings would normally be backed up and communicated by email.

Data source: Sage HR / Contract of Employment, Job Descriptions / Organograms
Data source: S: Schedules / Training Record (Induction, skill sets, training modules)
Data source: Office 365/SharePoint / CHT handbooks / Policies / Risk Assessments

Data source: 'Health & Safety Policy Statement'

Document source: Site Operational / Departmental Manuals Document source: 'Toolbox Talks' Manual - HR Training Dept.

#### M6 - Vehicle Fleet

CHT maintains a 'Vehicle database' that provides a comprehensive record of the Company's fleet assets, including the recording and monitoring of the Company's adherence to statutory retesting, relicensing, and 'O' licence compliance.

All referenced documents have been hyperlinked to and can be directly accessed via this database. The original vehicle and trailer documents themselves are filed securely and held within HQs 'Central Records'.

#### In headline terms, the CHT 'Vehicle database' records:

- All 3 CHT Operating Centres based "South" (Witney), "North" (Skelmersdale) &
   "Kent" (Lenham), their O Licence renewal dates and number of vehicles and trailers
   permitted at each Operating Centre together with addresses (identifying where
   these are to be parked up overnight within a secure site).
- Total number and type of vehicles and trailers held and operated by the organisation.
- Total number and type of vehicles owned by the organisation.
- Total number and type of vehicles on lease or rent or loan.

#### More specifically, the CHT 'Vehicle database' also records individual:

- Vehicle registration marks (VRMs) and vehicle identification numbers (VINs) for trailers comprising the CHT fleet, including V5 registration and plating certification.
- MOT retest dates and certification.
- Tacho 2-year & 6-year retest dates and certification.
- DVS ratings and approved 'HGV Safety Permit' applications.
- Road tax or SORN declaration renewal dates together with evidence of compliance
- 'O' licence allocation and vehicle/trailer location
- Euro engine number
- MID registrations etc.

By selectively using the inbuilt filters (to filter 'Operating Centre'), the Vehicle database can identify the following records:

• Number and type of vehicles and trailers based at each operating centre

#### **Fuel used**

All CHT vehicles are fuelled by DERV, whilst Euro V1 'engined' vehicles also use AdBlue. The consumption of individual fuel consumptions (including use of AdBlue) is all recorded, monitored and reported via the Fueltek tracking system.

#### Parking arrangements

Each operating centre has been provided with parking arrangements in place to meet the requirements of its O Licence enough to park up to the maximum permitted numbers of vehicles and trailers. Each centre is fully secured and patrolled.

### M7 - Regulatory Licensing

#### 'O' Licences

A full copy of the Company's **three** 'O' licences 'North' - ref. OC0294350 (for 68 vehicles and 62 trailers), 'South' - ref. OC0206525 (for 90 vehicles and 90 trailers), and 'Kent' - ref. OK1149050 (for 5 vehicles and 6 trailers), are included in this section of the manual, together with a current full printout detailing all registered CHT vehicles and current 'OCRS' scores.

Each of these 'O' licences contain enough vehicle margin to allow for any flexibility required in their respective Traffic Operations as set out in the 'Operator Licence Procedure'.

#### **Operator Licence Procedure**

The day-to-day administration and management of the 'O' licence registration, including additions, deletions and / or amendments (i.e., movements between 'O' licences) is restricted to and directly dealt with by Paul Street & Andy Holligan, Board Directors.

Independently monitoring of the day-to-day Company compliance to maintain accurate 'O' licence registrations is the responsibility of 'Central Records' via the 'Vehicle database', as maintained by the Compliance Officer. This database records all vehicle 'O' licence registrations, including monitoring individual vehicle transfers between 'O' licences where CHT vehicles have been relocated between operating sites. The Vehicle database further records and monitors the 'expiry' dates of the Company's three 'O' licences.

On a quarterly basis (Mar / June / Sept / Dec), the Operator Compliance Risk Score (OCRS) is printed out for each 'O' licence, which demonstrates regular internal compliance review. Within the past 12-months, CHT had no enforcement sanctions against it, nor been notified of any impending regulatory action being taken.

A copy of the 'Operator Licence Procedure' is filed in this section of the manual.

# Regional / City Vehicle Permits

(DVS) HGV Safety Permits are individually recorded on the CHT 'Vehicle database'.

### Other Licences

CHT also hold many other \*licences / registrations, but the key ones are as listed below, copies of these are included in this section of the manual:

- Registration of Carrier CB/UE5007UE [CHT ref. L003]
- Registration of Exempt Waste Operations [CHT ref. L022 and L024]
- TV Licence MUL/0900051969 [CHT ref. L001] [\*refer also 'O5 Specialist Operations']

\*CHT **shall** report to FORS any licence or permit revocations, suspensions or curtailments, AND any enforcement or regulatory action to be taken against CHT.

### M8 – Health & Safety

# Preamble – 'Health & Safety Policy'

CHT staff safety and welfare is taken very seriously and CHT are committed to maintaining a safe and heathy working environment for all its staff and visitors within the workplace.

The Company's 'Health & Safety Policy' ["H&S"] sets out how this is to be achieved, how it is to be managed and by whom within CHT. A copy of this policy document is displayed on all Company noticeboards and itself forms the very cornerstone of CHT's staff induction programme.

The 'H&S' policy is overseen and reviewed at least annually by the CHT Directors in consultation and signed off by the Chairman (Chris Hayter), as the named person with continuous and effective responsibility for 'Health and Safety' at CHT.

The 'H&S' policy is supplemented and supported by the following key policy documents all have links to CHT staff 'Health & Safety' and their 'Welfare':

- 'Employee Handbook'
- 'Drivers Handbook' (incorporating 'Driving Standards')
- Risk Assessments and Safe System of Working ('SSoW')
- CoSHH Assessments and Safety Data Sheets

[refer also 'D2 Driving Standards' and 'D3 – Staff Induction']

# Risk Assessments and Safe System of Working

All transport related activities are fully risk-assessed, copies of which are included in this section of the manual. Copies are also retained within the 'Traffic Office' manual which is made available for reference / inspection by drivers. All risk assessments are subject to general review at least annually.

Where deemed appropriate, Risk Assessments themselves are supported with Work Instructions (or 'SSoW') which fully prescribe the correct procedure CHT staff are required to adhere to, and the activity itself is to be carried out in accordance with their training (including 'on the job' training).

#### In particular:

**General 'H&S' advice** is provided under risk assessment (ref. RA056GEN) titled "General Hazards / Risks relating to drivers and their vehicles", and itself forms 'Appendix 1' of the 'Drivers Handbook'.

RA056GEN is to be read in conjunction with the Company's Driver Induction Programme and is linked to the Company's 'H&S Policy' and 'on-the-job' training.

#### **Vehicle & Driver-specific** risk assessments are in place for:

- Vehicle, Driving & General Hazards in Delivering Goods; including:
  - 'RA063GEN' (Vehicles... ref. to unsafe & unroadworthy vehicles, RTA damage)
  - > 'RA062GEN' (Driving... ref. to weather, seat belts, distractions, customer sites)
  - 'RA083GEN' (Driving... ref. to use of mobile phones & in-cab technology)
  - 'RA078GEN' (Generic Hazards in Delivering Goods)
  - 'RA085GEN' (Passenger Safety... ref. to carrying passengers & pets)
  - 'RA096.GEN' (Prescribed and Designated Routes)
  - 'RA106.GEN' (Delivering onto Construction Sites)

FORS eLearning "Smart Driving" used to raise driver awareness of work-related road safety.

- Working at height and preventing falls from vehicles; including:
  - 'RA057GEN' (Mounting and Dismounting Trailers)
  - 'RA032GEN' (Mounting and Dismounting Vehicles')
  - ➤ 'RA033GEN' Riding on Cab Steps)
  - 'RA055GEN' (Use of Tail Lift)
  - 'RA014GEN' (Use of Sack Truck Vehicle)
  - 'RA037GEN' (Use of Vehicle Ladders)
  - 'RA088GEN' (General Workshop Activities)
  - RA061GEN' (Use of Airport Steps. use: Workshop / checking abnormal loads)

#### Working around moving vehicles; including:

- 'RA039GEN' (Yard Area)
- 'RA017GEN' (Goods-In Ops Area)
- 'RA072JER' (Access / Egress Spacio Tent)
- 'RA088GEN' (General Workshop Activities)
- ➤ 'RA094GEN' (Roadside Recovery)
- Refer also FORS 'Toolbox Talk Personal Safety in or around Vehicles'
- Reversing, manoeuvring and turning; including:
  - 'RA034GEN' (Vehicle Manoeuvring in Yard)
  - 'RA042GEN' (On-Site Shunting Work)
  - ➤ 'RA040GEN' (Reversing of Vehicles)
  - Refer also FORS 'Toolbox Talk Vehicle Manoeuvring'
- Coupling, uncoupling and towing trailers; including:
  - 'RA038' (Parking of Trailers)
  - 'RA041GEN') (Coupling to a Trailer)
- Safe loading; including:
  - 'RA086GEN' (Load Safety all load carrying vehicles, including cars & vans)
  - 'RA105GEN' (Load Safety securing abnormal loads / use of load restraints)
  - 'RA020GEN' (Use of Dock Leveller)
  - 'RA023GEN' (Unloading Box Trailer)
  - 'RA031GEN' (Unloading a Container)
  - 'RA053GEN' (Loading / Unloading a Lifting Double Deck Trailer)
  - 'RA044GEN' (Loading / Unloading Curtain Sided Vehicle)
  - 'RA024GEN' (Use of Curtain Siders)

- 'RA060GEN' (Drivers Leaving Loading Bays)
- Refer also FORS 'Toolbox Talk Safe Loading & Load Restraints'
- Manual Handling; including:
  - 'RA058GEN' (Manual Handling of Loads)
  - 'RA028GEN' (Handball Goods Inward)
  - 'RA014GEN' (Use of Pallet / Sack Truck Vehicle)
  - 'RA059GEN' (Pallet / Loads on Vehicles)
  - Refer also FORS 'Toolbox Talk Health & Safety'
- Substances hazardous to health; including:
  - 'RA043GEN' (Refuelling a Vehicle...)
  - ➤ 'RA094GEN' (Roadside Recovery)
  - 'RA093TPT' (Covid-19)
  - > 'RA082GEN' (Use of Welding Equipment)
  - 'RA036GEN' (Use of Hot / Cold Pressure Wash)
- Lone Working and Operational Security; including:
  - > 'RA052GEN' (Overnight Sleeping in a Vehicle Cab)
  - 'RA062GEN' (Driving ... incl. 'Lone working')
  - > 'RA094GEN' (Roadside Recovery)
  - 'RA084GEN' (Ops Security & Counter Terrorism)

### Personal Safety in or around Vehicles

CHT require all personnel (employees, contractors and visitors) to wear high visibility clothing in the vehicle yards to visually aid their presence to drivers of all vehicles including MHE.

All personnel are required to only use identifiable designated safe access routes whilst always remaining vigilant to the presence of both vehicles and FLTs which may be operating in the near vicinity.

# Driver Assessment Test (... checking for safe & competent driving)

**Prior** to appointment and fundamental to the CHT driver recruitment process, all prospective drivers are required to undertake and **pass** a CHT 'Driver Road Assessment Test'. This test is carried out by an CHT in-house qualified assessor.

**Post** appointment, all CHT drivers are required to undertake an **annual** 'Driver Road Assessment Test' (again carried out by an in-house qualified assessor).

Following an RTA incident and depending on cause and circumstance, a CHT driver may be required to **re-sit** a 'Driver Road Assessment Test'.

[refer also 'O3 Road Traffic Collision']

# <u>Vehicle</u>, routes & customer familiarisation (... checking for awareness)

CHT policy is to allocate each driver their own vehicle, and as part of the initial driver induction training (including a general introduction to their own vehicle and to engender

confidence and familiarisation with their expected duties), a newly appointed driver will initially 'buddy' up for a period with an existing experienced CHT driver.

During which 'buddy' period the newly inducted driver will receive:

- All necessary vehicle-specific safety information pertaining to the vehicle designated for them, including (but not limited to); the correct use of the vehicle tail lift, fitted safety devices and installed vehicle technology (such as Samsara), correct refuelling procedure, daily vehicle inspection checks & defect reporting etc. [... refer 'Driver Vehicle Allocation Record']; and
- Be briefed and made aware of 'customer specific' site instructions and applicable site rules including (but not limited to) correct 'booking-in' process and unloading.

Whenever a driver is first allocated to a vehicle or subsequently has changed to a different class of vehicle, he / she will be taken through a vehicle familiarisation process, including familiarisation with its tail lift operation. Where deemed appropriate the driver will undergo a 'Driver Road Assessment Test' in their new allocated vehicle.

[Copies of both the 'Driver Road Assessment Test' and 'Driver Vehicle Allocation Record' are filed in this section of the manual.]

# Safety at Customer Delivery Locations (... checking for safe access)

CHT undertake a comprehensive 'safe access check' at all merchandiser locations, written details of which are recorded on the 'Access check' form supported by photographic evidence, and these forms are retained on file. A copy of the CHT access check procedure and check form is in this section of the manual.

# Safety Committee (... review of accidents / incidents & take learnings)

The Company has a 'Safety Committee' (comprising of two sub-committees, one 'Transport / Driver operations', the other 'Warehouse operations'), which meet regularly to assist in the identification, implementation, and review of appropriate H&S programmes. The H&S Advisor is responsible for advising the Company of its statutory obligations about health, welfare and safety.

Whilst sitting, each sub-committee will review relevant accident data, and seek to find the causes and issues giving rise to incidents and accidents, so that action can be taken by the Company to mitigate risk of reoccurrence. 'Safety Committee' meetings are attended by senior management, and (in the case of 'Transport / Driver operations' sub-committee) will involve driver representation. Minutes are taken at all 'Safety Committee' meetings, and the minutes subsequently communicated to all employees via Company noticeboards.

<u>Hazard Report Form & Near Miss Report</u> (... to help prevent accidents) In practice within the CHT workplace environment, whether staff are engaged within the 'Warehouse', 'Workshop', 'Office' or are 'Driver-Transport' related, all workplace health and safety and staff welfare issues are implemented, administered and

monitored <u>at direct line manager level</u> in accordance with laid down Company procedures and policies.

Fundamental to and supporting this process all CHT drivers at their induction have been provided with a copy of the Company's Hazard report form', which provides them with the means to both record and report back to their line manager any hazards they become aware of whilst undertaking their daily deliveries at customer premises.

This form originated from a driver request presented to the H&S 'Safety Committee' meeting in April 2015. A copy of this form together with the 'Near Miss Report' is in this section of the manual. When the Company receives 'Hazard Report form' this is logged on file and the reported issue managed through to a final resolution].

Workplace Safety Audits (... an independent set of eyes by NFU expert) Overseeing and checking the Company's obligation to provide a safe working environment for its staff, the H&S Advisor, will visit each CHT operational centre on a periodic basis and undertake a full, comprehensive and independent 'Health & Safety Site Audit'.

Such site audits are undertaken in the presence of the CHT site Operations Managers, and the auditing criteria set out in checklist / pro-forma, which examines all aspects of the operation including the warehouse and vehicle loading environment, vehicle workshops, offices and yard spaces. The audit results are documented, criteria scored, and the report communicated to senior management together with a list of all corrective actions to be taken.

Completed site audit reports are retained within 'Central Records', and the reports themselves are hyperlinked to a bespoke Company database for ease of access and management scrutiny.

Customer & Other Workplace Safety Audits (... checking for compliance to rules) Aside from the 'in-house' CHT own site audits, the Company is subjected to independent audits by BRC, Soil Association at its designated food storage premises located at Conway, Jervis, Trinity, Skelmersdale and Heywood, whilst all CHT sites are subjected to customer own audits.

All such audits are set against an BRC or customer own checklist / pro-forma, audit results are documented, criteria scored and the reports themselves communicated to senior management together with a list of all corrective actions to be taken.

# Recording of Accidents and Incidents at Work (... Management info.)

All accidents and / or incidents at work are fully recorded within the 'Accident database'. Each case is overseen and managed to full resolution by the Manager assisted by the Company's appointed and qualified, Health & Safety (H&S) Advisor.

The same 'Accident database' includes related tabs for 'Risk Assessments', 'Work Instructions', 'Safety Data Sheets' and 'Audit' reports.

Data source: R: Accidents / Risk Assessments / Work instructions / H&s audits / Handbooks & Policies

### M9 - Complaints

CHT has put in place appropriate procedures for the management and resolution of 'complaints', comprising 'Complaints Procedure' and 'Responsible Reporting (whistleblowing) Procedure'. All complaints are logged on a 'SharePoint' system, the content of which is considered as part of the FORS review.

Any 'complaint' received by CHT is recorded and taken very seriously, particularly if it is a '**Public**', '**Customer**' or '**Staff**' complaint, or those of a '**Traffic**' nature such as those involving driver conduct.

According to the very nature and subject of the 'complaint', this will be appropriately dealt with and investigated by the senior head of the appropriate operational department liaising, as necessary, with senior management up to Director Level.

A copy of the CHT 'Complaints Procedure & Process', 'Personal Complaints Procedure' and 'Responsible Reporting (whistleblowing) Procedure' are located in this section of the manual.

#### Traffic

In the case of a **'Traffic'** complaint, these are all dealt with and overseen personally by Paul Street, Joint Managing Director, and / or by a named holder of the Company's three 'O' licences. [refer also 'M10 – 'Transport infringements'].

Each 'Traffic' related complaint will be the subject of a full investigation, the results of which may lead on to disciplinary action being taken against a proven transgressor or require that he / she receives additional training. Such investigations are fully documented, and details held securely on the various Company databases.

Where disciplinary action and / or additional training have resulted from an investigation, this information will be separately held on the employee personnel record. Examples of complaints against drivers can be found in this section of the manual.

#### Public

Whilst CHT do not receive many complaints from the public, those that are received tend to be of a 'Traffic' related nature, and whose complaint process is fully documented above. CHT do not have any CCJs against its name or received anything of similar serious nature.

#### Customer

Due to the very nature of the 'Customer' complaint process being 'customer and / or site specific', it is <u>not</u> operationally practical <u>nor</u> is it a customer requirement for CHT to record all customer complaints in a single electronic database or to hold such complaints in one location, but all 'complaints' are readily accessible to management upon request.

Consequently, and where appropriate, it is a long-established Company policy for each CHT operational site to have its own written 'customer complaint' procedure bespoke to each \*customer requirement, each outlining the full 'complaint' process, from initial receipt of the complaint - to investigation - to identifying corrective action(s) - through to final resolution. In each case, a full audit trail is required to be maintained throughout, with each complaint recorded generally in an Excel spread sheet, with related documents retained on hard copy file.

\*It is an accepted condition of most customer contracts (and is included as part of the customer own auditing standard) to require CHT to provide them with on-site evidence of a documented 'complaints process'. Example copies of site-specific complaint processes are included in this section of the manual.

### Staff

CHT's 'Personal Complaints Procedure' emphasises the timely reporting of any complaint about the Company so that any issues of concern can be immediately investigated and put right. The procedure sets out the initial reporting procedure, placing an emphasis on resolving issues of complaint 'informally', but also sets out an escalation process if a person is not satisfied by the initial response and wishes to pursue a 'formal' complaint, by directly writing to Chris Hayter (CHT Chairman).

CHT's 'Responsible Reporting (whistle blowing) Procedure' places emphasis on its staff to act responsibly always, and to feel empowered to immediately report to senior management any criminal act or any act of wrongdoing or anything which may pose a threat to their personal safety or that of their colleagues or to their working environment.

#### Compliments

CHT will often receive 'compliments' from satisfied customers and from the public alike who have noted good conduct demonstrated by CHT personnel. Where such compliments are received, these are communicated directly to all concerned, and serve as 'testimonials' of the service CHT provide on behalf of its customers – examples of which are contained in this section of the manual.

All 'complaints' and 'compliments' received by the Company will form part of the scheduled FORS annual review.

# **M10 – Transport Infringements**

### **Policies**

The Company is committed to ensuring that its drivers operate legally, safely and professionally so that operational risk exposure is minimised, and costs are controlled. The objective is to operate in full compliance with the relevant traffic legislation and ensure our drivers obey those rules.

To achieve this, CHT has in place policies and supporting procedures to record, investigate and monitor all transport-related breaches and offences.

#### More specifically:

- ✓ CHT's 'Transport Infringements Policy & Procedure' document sets out how this is to be achieved, how it is to be managed and by whom within CHT.
- ✓ The CHT 'Drivers Handbook' (incorporating 'Driving Standards') set out the Company's responsibilities, policies and procedures staff are required to adhere to in respect of ensuring continued:
  - Legal compliance [In all its various forms and guises, including but not limited to; correct and indate licensing, strict adherence to Driver's Hours and Working Time, fitness to drive, safe vehicles and loads etc.]; and
  - Infringement avoidance
    [In all its various forms and guises, including but not limited to; regulatory and traffic offences, road user & congestion charging, observing clean air and low emissions zone restrictions, and 'out of hours' and/or permit scheme restrictions etc.]
- ✓ DVSA 'Stay Legal' leaflet (issued to all drivers) directly references the above.

### **Driver conduct**

CHT take very seriously any traffic related violation and will take all necessary action including disciplinary action to safeguard its hard-earned reputation for good vehicle management and vehicle safety.

CHT's 'Driver Handbook' specifically refers to 'driving and behavioural standards' and sets out the Company's expectation that drivers will comply with all relevant legislation, comply with transport related schemes, and will drive courteously and within the confines of the Highway Code.

CHT drivers are made aware that their 'driving standards' will be monitored by 'Traffic Management' and may be held personally accountable by the Company for reimbursing it for any driver infractions directly attributable to their negligent actions which results in a penalty charge notice 'PCN' being received by the Company, and in addition may be subject to disciplinary action being taken against them.

### Driver infraction - notification & investigation

It is Company policy that:

- Drivers are to notify CHT of all driver infractions (howsoever caused), as set out in the 'Drivers Handbook' (Section 2 'Monitoring Driving') and affirmed on the 'Driver Eyesight Test & Medical Declaration' form; and
- 'Traffic Office' Shift Managers proactively manage, monitor, investigate and accurately record all driver infractions.
- 'Traffic Office' Shift Managers are directed to inform the "National Transport Manager" and the "Joint Managing Directors" of such infractions in order that remedial action can be taken to minimise future recurrences.

Where driver infractions have occurred, the incident will be the subject of a full documented investigation by 'Traffic Management', which may result in several actions being taken including but not limited to a review of Company policies and procedures, a recommendation for further driver training or refresher training, and / or disciplinary action being taken against the driver.

[Depending on circumstance and subsequent outcome of the investigation, a driver may be held accountable by the Company to reimburse it for the full amount of the fine, as set out in the Company's 'Drivers Handbook', a copy of which is included under 'M5 – Communication'.]

Where deemed appropriate, CHT drivers will be required to complete the FORS eLearning module "Smart Deliveries" relating to kerbside loading and unloading (its predecessor being the FORS eLearning module "Parking & Loading Legally").

As part of the annual review of the FORS 'Management Manual', the FORS review team will take into consideration total numbers of and trends of any driver / vehicle infractions that have occurred during that year and compare against previous years.

# FORS reportable offences

In addition to the established practice of recording all legal and non-legal actions against CHT, and having an established documented procedure for dealing with fleet operation 'Complaints', the FORS standard requires CHT to notify FORS in writing as soon as reasonably practicable, and in any event within five business days, if the Company or its employees have been found guilty and convicted of committing an offence under the Road Traffic Act 1988 or the Health and Safety at Work Act 1974, or any other legislation as listed in the FORS Compliance and Enforcement Guidance for Operators.

As the appointed 'Responsible Person' for the CHT Transport Operation, any such offences will be reported to FORS by the National Transport Manager in writing within 5 days.

<u>Licence Checks</u> [refer also 'D1 – Licensing']

Driver licence checks are conducted quarterly and checked for validity (i.e., licenses are 'in-date') and for any driver infractions. More frequent Driving Licence checks will be carried out by the Company where drivers have incurred 6 penalty points or more on their Driving Licence.

The 'Driver Eyesight Test & Medical Declaration' requires a CHT driver to make a signed declaration that he/she will inform the Company of any road traffic incidents, convictions, endorsements, or disqualifications that occur, which could affect their entitlement to drive.

The quarterly review of the OCRS also identifies any infractions, and any that have not been previously notified to the Company are dealt with by the Joint Managing Directors, who may have recourse to the Company's 'Disciplinary Policy'.

#### **Vehicles**

Started July 2022, all CHT vehicles are being refitted with an upgraded **Samsara** digital cloud-based vehicle tracking system, with integrated forward facing in-cab camera.

The purpose of this system is to record images (inside & outside cab) for the purpose of accident prevention and to identify **preventable transport infringements** involving a CHT vehicle.

- The Samsara tracking system is connected to <u>both</u> the vehicle tacho and engine management system and provides in real time analyse information about a driver's driving style, travelling speeds, tachograph information (including driving time, breaks, POA, rest periods, etc.
- The in-cab camera uses "AI" (Artificial Intelligence") software and will detect real time driving events such as: speeding/over speeding, harsh braking/cornering/turning, potential collision risk etc., amongst many other 'event detection' features.

When the 'Al' software senses such events, a short 15-second clip is automatically stored for a 'Traffic Manager' to review. This enables Traffic management to promptly address issues of concern in respect of a driver's 'driving standards' by providing further education and coaching. Whilst the Samsara system will real-time report on all incidents of speeding, the Company will promptly respond should UK enforcement authorities inform it of any such incidents arising.

Data source: Samsara telematics software fitted to CHT vehicles.

Secure data source: HR Office / file: Licences & OCRS quarterly check

Source: Traffic / Driver infractions file & 'fine admin form' (in this section of the manual)

Secure data source: Employee personnel record, and Sage HR

### M11 - Transport Updates

As members of the FTA (Logistics UK) and other relevant organisations, CHT will receive regular and timely updates, normally via electronic medium, keeping us abreast of new developments within the industry.

As a FORS member, CHT regular receive FORS news updates by email. Accredited by the RTITB Master Driver Consortium as a JAUPT approved training centre, CHT also receive regular updates normally by email.

In addition, CHT liaise with or subscribe to a variety of specialist service providers such as: The British Safety Council, SAGE that helps support our business across all areas, including legal compliance, health & safety management, and HR / people management.

Because of working closely with its insurers NFU, CHT regularly receive support, advice, and updates to ensure that our business is operating in accordance with legal requirements and adopting best practice.

Where appropriate and relevant, all 'Transport' related updates are briefed to drivers and employees – see 'M5 Communication'.

Related certificates of membership or association are included in this section of the manual, together with an example copies of both FTA, RTITB and other newsletters or updates received by email.

Data source: S: Schedules / Contracts/tab: Certificates

Data source: CHT login / FTA membership, CHT login/FORs membership

Data source: CHT login / Sage HR & Payroll

Dara source: NFU / Certificate of Appointment - Health & Safety Support Services

# **Vehicles**

# V1 - Serviceability & Roadworthiness

### **Policies**

CHT has put in place the required resources, policies and supporting procedures to maintain vehicles, trailers, and specialist equipment in a serviceable and roadworthy condition, whilst ensuring that all vehicles, trailers and specialist equipment operate on the roads safely, within the law and with consideration of the environment.

More specifically, CHT's 'Vehicle Serviceability & Roadworthiness' policy provides staff with all relevant information on:

- Management & supervisory responsibilities
- Procedures for:
  - o Planned & unplanned maintenance, and optimising performance standards.
  - First use inspections (including inspection of 'leased' or loaned vehicles) and vehicles and trailers brought back into service.
  - o How safety critical defects and prohibitions are managed and investigated.
  - How unroadworthy vehicles are removed from service and subsequently returned to service when passed fit.
  - Reported defects [refer also 'V2 Daily Walkaround Checks'].

# CHT 'in-house' Vehicle Inspection and Maintenance

With specialist, fully equipped HGV vehicle Workshops at its two main transport hubs located at Skelmersdale in the 'North' and at Witney in the 'South', CHT can service its own fleet of vehicles and trailers in-house.

CHT vehicles are subject to six weekly inspections, whilst trailers are subject to ten weekly inspections. Such inspections are timed / planned to coincide with any MOT inspection dates that may be due.

All fleet maintenance interventions for 'North' and 'South' (which includes 'Kent'), are \*planned 'Centrally' at / by Witney Workshop and are recorded on a 'Vehicle Maintenance Programme and Record VC100' wall chart, with data recorded / stored within a bespoke Workshop vehicle maintenance database.

\*Each month Witney Workshop will issue by email a schedule of those vehicles and trailers which require to have a MOT inspection. This schedule provides enough time for the respective Workshops staff to pull listed vehicles or trailers from the fleet ('off road') for both servicing and MOT preparation, put through a MOT inspection, and then return to the fleet having been fully serviced / MOT'd.

The VC100 charts for both 'North' and 'South' are planned six months in advance, and charts are retained to show a minimum of 15 months' history of testing and inspections that have been carried out previously.

These Workshop based systems help CHT to ensure that it meets both the required standards and frequency of maintenance whilst ensuring that all statutory retesting is

completed in good time. Workshop records are routinely updated to fully account for all new vehicle or trailers added to the CHT fleet, as well as closing off old records on those vehicles / trailers which have been disposed of.

CHT have adopted the FTA standard for fleet maintenance, sample copies of the VC10 ('motor vehicles') or TC10 ('trailers') maintenance inspection forms are in this section of the manual.

All vehicle maintenance records are filed at the Workshop that undertook the servicing, and in Skelmersdale Workshop case, a copy of these records is forwarded to Witney Workshop for filing on their vehicle or trailer 'Central Record'. All maintenance records are available for inspection and scrutiny at the respective Workshops and are held for at least 15 months.

### **Torquing**

Torquing is undertaken at a service inspection and is recorded on a torquing record card, which is filed in the Workshop maintenance record, an example of which is included in this section of the manual.

Between workshop services, routine torquing is required to be undertaken by CHT drivers, the importance of which forms part of their induction and reinforced through professional development training.

[CHT drivers undertake training on HGV compliance, 'O' Licence requirements, vehicle roadworthiness, defect reporting and load safety as part of their CPC courses. Drivers are also required to undertake FORS eLearning training on modules including but not limited to "Van Smart" and "TruckSmart".]

# Vehicle database (... legal compliance)

Operating quite separately from the Workshop based systems, CHT has put in place a 'Vehicle database' that purposely records and separately monitors the Company's adherence to statutory retesting, vehicle permits, relicensing and 'O' licence compliance; more specifically including:

- MOTS
- Tacho 2&6-year retests
- Road tax or SORN declaration
- 'O' licence updates & MID registrations
- (DVS) HGV Safety Permits

The 'Vehicle database' itself is **'evidenced based'** (requiring sight of hard copy evidence before changes are made to it) and all data entries are hyperlinked to 'pdf' copies of relevant certifications and registration documents. The original vehicle and trailer documents themselves are filed securely and held within HQs 'Central Records'. [Refer also 'M6 – Vehicle Fleet']

# Vehicle telematics (Samsara)

Started July 2022, all CHT vehicles are being refitted with an upgraded **Samsara** digital cloud-based vehicle tracking system, which is connected to <u>both</u> the vehicle

tacho and engine management system and provides in real time analyse information about vehicle maintenance data in respect of the vehicle engine including faults and warning lights etc. Sample vehicle engine analysis reports can be found in this section.

# Workshop equipment (... LOLER compliance)

In respect of specialist Workshop lifting equipment (LOLER) and MHE / forklifts, these items are routinely inspected by Vulcan Inspection Services on behalf of our insurers NFU. Such inspections are diarised and recorded by Vulcan to ensure that the mandatory retests are carried out at the required intervals. Copies of the Vulcan inspection reports are included in this section of the manual, and originals held within HQs 'Central Records'. These certifications are also separately recorded, and the documents hyperlinked within the 'MHE database' against 'Workshop equipment'.

Bespoke Workshop lifting gear and vehicle diagnostic equipment etc. is serviced, calibrated and maintained by an appointed and contracted specialist service provider. All service records are retained and filed on site and are available for inspection.

### <u>Specialist equipment</u> (... calibration compliance)

All specialist equipment fitted to a vehicle including speed limiters, tachographs, lifting equipment etc., or specialist diagnostic and lifting equipment stored / used within the Workshop environment is routinely inspected, calibrated, serviced (and recalibrated) according to legal and / or manufacturer's requirements.

Calibration records are filed within the respective Workshop vehicle or trailer file record and are available for inspection and scrutiny. Original tachograph calibration certificates are retained within 'Central Records', the certificates themselves being hyperlinked to dated entries within the 'Vehicle database'.

# Workshop skills & qualifications (... staff competencies)

CHT Workshops are staffed by experienced HGV workshop fitters who have previously attained (or are working towards) accreditation to a relevant industry body such as the Institute of Road Transport Engineers (IRTE) National Workshop Accreditation scheme.

[The 'Workshop Supervisor' and 'Workshop Fitter' job description sets out the knowledge and experience required for each of these positions, copies which can be found under 'M4 – Staff Resources'.]

# 'Technical Engineering Advice'

#### **Witney Workshops**

lan Brown, Witney 'Workshop Adviser' is the named person on the Company's 'Southern' organisational chart with responsibility for 'Technical Engineering Advice' at Witney and has overall responsibility for 'Technical Engineering Advice'.

lan Brown has signed a declaration confirming CHT's Workshop technical facilities and staff competence are adequate for the size of the CHT fleet and type of vehicles operated. A copy of this declaration can be found in this section.

#### **Skelmersdale Workshops**

Matthew Tighe, Skelmersdale 'Workshop Manager' is the named person on the Company's 'Northern' organisational chart with responsibility for 'Technical Engineering Advice' at Skelmersdale.

Matthew Tighe has signed a declaration confirming CHT Workshop technical facilities at Skelmersdale, together with their planned staffing levels (including external resource availability) and staff competence are adequate for the size of the CHT fleet and type of vehicles operated. A copy of this declaration can be found in this section.

Data source: Samsara telematics software fitted to CHT vehicles.

Data source: S: Schedules / Vehicles / Vehicles database.

Data source: S: Schedules / MHE database / Vulcan inspections.

Data source: S: Schedules / Contracts / service contracts.

Documents: Workshop vehicle records / wall charts.

### V2 – Daily Walkaround Checks

#### **Policies**

Set out in the H&S Policy and Drivers Handbook, it is Company policy and a legal requirement (refer also DVSA 'Stating Legal' leaflet) for all drivers to:

 Complete a full vehicle and trailer daily walk around check <u>before</u> commencing their shift using the standard pro-forma style checklist form provided.

[A minimum of one walkaround check is to be completed by the driver within each 24 hours period.]

• Where a change of vehicle or trailer has occurred during the day, and <u>before</u> it is used, the driver is required to conduct their own walkaround check.

[As CHT has a policy of 'one vehicle one driver' this largely removes multi-vehicle use within a shift, with the added benefit that drivers become familiar with their own vehicle and can sometimes detect a slight fault before it becomes a major issue.]

- Record on a pro-forma 3-part 'Vehicle Defect Report' and immediately report to Traffic management all defects found howsoever arising, whether from:
  - o the initial daily walkaround check; or
  - o whilst the vehicle or trailer was in use; or
  - o following the return of vehicle or trailer to the operating centre.

These policy requirements are affirmed in the:

- √ 'H&S Policy' (under the section header 'Transport and Mobile Equipment');
- ✓ 'Drivers Handbook' (under the section header 'Vehicle Safety, Maintenance & Safety Checks'); and
- ✓ 'Vehicle Serviceability & Roadworthiness Policy' (under 'Employees' Duties).

#### Checklist

The pro-forma checklist covers all the prescribed 'serviceability' requirements set out in the FORS Standard, including (but not limited to) checking load restraint systems such as lashing/anchor points, bulkheads and curtains, checking 'vehicle safety equipment' such as under-run protection guards, mirrors and warning signage as fitted to the vehicle for purposes of assisting the driver detecting vulnerable road users; etc.

A walkaround checklist will be completed for all vehicles and trailers irrespective of whether they are CHT owned/liveried or whether leased or hired in temporarily.

[A spare copy of the "Blind Spot" signage is kept in each driver' Accident Pack, to enable the driver to replace it immediately if found to be missing or damaged/unreadable].

The pro-forma checklist also includes provision for drivers to declare "nil defects".

Started July 2022, all CHT vehicles are being refitted with an upgraded **Samsara** digital cloud-based vehicle tracking system, which includes an electronic version of the driver walkaround check list which can be completed by the driver using their existing in-cab tablet. A sample Samsara check list can be found in this section.

Following such a walkaround check, any defects observed by the driver must be appropriately recorded on a pro-forma 3-part 'Vehicle Defect Report' and immediately reported directly to 'Traffic' management.

### **Defect Reporting**

Once a defect report has been completed by the driver the vehicle or trailer is automatically deemed 'off road' and cannot be used or appraised as being 'road worthy' until it has been inspected and sanctioned as being safe and fit for purpose by a suitably qualified person (normally a CHT workshop mechanic).

A yellow file copy of the 'Vehicle Defect Report' is held on file in the 'Traffic Office' and all 'open' defects are monitored daily and managed through to final resolution. The top and second copy are sent to the Workshop.

Completed defect forms are filed within the respective Workshop vehicle or trailer file record, where they are held for at least 15 months, and are immediately available for inspection and scrutiny.

### Independent vehicle checks

Independent of the drivers own daily vehicle check, the respective CHT 'Traffic Offices' located 'North', 'South' and 'Kent' will conduct 'blind vehicle checks', checking a driver's vehicle to ensure that levels are maintained (water, oil, windscreen wash), checking tyre condition and pressures, and for windscreen damage etc.

In addition, the 'Traffic Office' undertake a daily 'trailer check' ensuring that parked trailers all have their handbrake securely applied. This is a precautionary measure and helps to ensure that the correct and prescribed trailer parking procedures have been fully adhered to.

All vehicle / trailer check forms are retained and filed on site with their associate vehicle load sheet (where applicable) and are available for inspection.

Examples of the driver 'vehicle / trailer daily inspection' form, driver 'vehicle defect report', CHT 'blind vehicle check sheet' and 'daily trailer check' form are included in this section of the manual.

# **Training**

At induction, CHT drivers are shown how to conduct and made aware of the importance of the daily walkaround vehicle (and trailer) check, and to adhering to the Company's prescribed vehicle defect reporting procedure.

These fundamental requirements are reinforced by the Company through its 'Professional Development' training programme, comprising:

 CPC modules to be undertaken relating to vehicle inspections and defect reporting, safe loading, etc.; and

 FORS eLearning training to be undertaken specifically including "Van Smart" & "TruckSmart".

In 2020, all CHT drivers attended a '**Driver Workshop'** inhouse presentation, which covers a range of driver awareness subjects including the importance of drivers conducting 'Daily Vehicle Checks' and observing the correct 'Defects' reporting procedure.

CHT inhouse training is conducted and supported by an RTITB accredited (JAUPT approved) trainer.

[refer also 'D4 – Professional Development]

### **Driver Road Assessment Test**

Prior to being appointed and thereafter (to be sat annually) CHT drivers are required to sit an 'Driver Road Assessment Test', which includes a 'Walkaround check'.

#### V3 - Insurance

#### Insurance

CHT hold all required insurances, licences, and certificates of membership and / or accreditation necessary to support its UK based warehouse and distribution operation. All insurance certificates have been included in the 'Contracts Database' / Insurance, which records and monitors each policy expiry date, providing warning via a traffic light system. CHT also have other non-obligatory insurances in place such as (but not limited to) 'Directors & Officers' and 'Cyber Network Security & Privacy'.

The Motor insurance policy has been purposely drafted to automatically include any vehicle owned by or in the custody or control of CHT. Likewise, the Property insurance policy automatically includes all machinery and plant owned, hired or leased by CHT thereby alleviating the need for CHT to constantly having to update its insurance provider as vehicles, machinery or plant is both acquired or disposed of during the full period of insurance.

Copies of Certificates of Insurance for: Motor, Public / Product Liability, Employers' Liability, Property, and Goods-In-Transit (GIT) are in this section of the manual.

### **Insurance evaluation**

An annual evaluation of the Company's insurance requirements is conducted at a meeting between CHT Directors and its insurance broker (NFU), at which ALL CHT insurances are reviewed prior to their renewal, to ensure that they are fit for purpose and remain relevant to the Company's needs in the forthcoming 'insurance' year.

#### MID / O Licence

The day-to-day administration and management of the 'Motor Insurance Database' (MID) and 'O' licence registration is restricted to and directly dealt with by Jenny Hayter, Board Director.

New CHT vehicles to the fleet are added to MID immediately on date of actual purchase. Similarly, CHT vehicles which are sold or scrapped are removed from MID on date the V5C has been completed with the new owner details.

# Record keeping

The CHT vehicle bespoke 'Birth Certificate' confirms actual date of MID and 'O' licence registration, whilst independently overseeing the day-to-day Company compliance to observing regulatory dates and / or new registrations is the responsibility of 'Central Records' via the 'Vehicle database' (as maintained by the Compliance Officer), which records all vehicle / trailer registrations, their regulatory dates and which includes both MID and O licence confirmation of registration.

A copy of the current MID report is in this section of the manual, whilst a copy of the CHT vehicle bespoke 'Birth Certificate' is filed under 'V4 - Vehicle Tax'.

#### V4 - Vehicle Tax

The day-to-day administration and management of the 'Vehicle Excise Duty' renewals and / or SORN declarations is restricted to and directly dealt with by the Sites & Assets Manager, Louis Hayter and the renewal process itself is set down in a flowchart.

Whilst independently overseeing the day-to-day Company compliance to observing regulatory dates and / or new registrations is the responsibility of 'Central Records' via the 'Vehicle database' (as maintained by the Compliance Officer), which records all vehicle / trailer registrations, their regulatory dates, including but not limited to, vehicle excise duty renewal date.

Such renewals are diarised and notified in advance to the Sites & Assets Manager, by HQ 'Central Records'. Following a renewal or having made a SORN declaration online, copies of the resultant confirmation of tax renewals or printed SORN confirmation are recorded in HQ 'Central Records'.

The 'tax due date' and 'vehicle tax banding' are both determined and recorded on the 'CHT Birth Certificate' whenever a new vehicle is first added to the CHT fleet, an example completed copy of which is in this section of the manual.

A copy of the advance diary notice email and the vehicle tax renewal process flowchart is in this section of the manual.

Data source: S: Schedules/Vehicle database/Vehicles/docs/SORN

Data source: S: Schedules/Vehicle database/Vehicles/Tax renewal confirmation

Data source: S: Schedules/Vehicles/Vehicle database/CHT Birth Certificate

### V5 - Load Safety

#### **Policies**

CHT has put in place the required resources (including providing staff training & safety equipment), policies, risk assessments and SSoW procedures to ensure CHT staff are knowledgeable and proficient to ensure CHT vehicles are safely loaded and that loads are properly secured prior to transportation.

CHT's 'Load Safety' policy outlines the requirements and obligations of all loading staff and drivers to maintain 'Load Safety'.

### V5.1 Load safety for HGV

Due to the very importance of the subject matter and need always to protect the Company's 'O' licences, CHT ensures that all drivers and loaders are fully trained in the principles of 'safe loading' and 'load security'; that the Fleet's vehicles are fit for their intended purpose with adequately rated ratchet straps provided for load security, and that all CHT vehicles have correctly identified maximum weights and load limits.

Such training is an integral part of driver induction and 'load safety' features as a module within CHT's CPC refresher training programme. The FORS online "TruckSmart" module will also be undertaken.

Warehouse ('back door') loaders are fully MHE competent and are trained in the principles of 'safe loading'. Supporting all of this are CHT training modules on 'Safe loading' (including 'Toolbox Talks' refresher training / information screens), and a range of 'load safety' subject related risk assessments.

Before handling new customer products, or taking on a new customer delivery point, CHT will: (i) assess 'Product Security' (structure and containment) and 'risk' (with ref. to its product 'Safety Data Sheet'); and (ii) assess 'Safe Access' at new delivery points.

### New Customer Products and Delivery Points

CHT will ensure that it has received the appropriate product information in advance to be able to put into place any necessary additional provision beyond that deemed normal practice for stock handling management. This information may take the form of a product 'Safety Data Sheet', dimensions and / or weight of pallet, and such information is made available to staff and stored on bespoke Company databases.

CHT will conduct safe 'access checks' at all new customer delivery points in accordance with written guidelines, a copy of which is in this section of the manual.

# CHT Drivers Vehicle Inspection Check and Pre-check of Load

As a matter of standard operational practice and Company policy, all CHT drivers are required to conduct a vehicle inspection check and pre-check their load before leaving either CHT or customer premises, ensuring that both vehicle and load is safe and fully secure. If a driver is unsure, a list of public weighbridges is available (copies of which are filed in this section of the manual).

ALL CHT vehicles are fitted with an in-cab height warning notice. Artic drivers are required to <u>re-set</u> the cab height-warning notice when picking up a new trailer irrespective of the trailer height.

#### New CHT Vehicles Added to Fleet

Before a new vehicle is introduced to the CHT fleet and made 'operational', each vehicle or trailer will undergo a full service as part of a 'in-house' Workshop induction process, at which time key details are checked, identified, and confirmed, including details of maximum weights and capacity limits.

Following completion of this induction process a 'CHT Birth Certificate' is issued to all interested parties. All vehicles are fitted out by the Workshop with the appropriate number and type of 'load restraints' including ratchet straps, which then form part of that vehicle's installed equipment.

These base details are then entered on the Company bespoke 'CHT planning system' against the vehicle or trailer ID and / or group, together with any other restrictions applicable or permissions required (such as: registration for London Congestion Charge, London Lorry Control, Snap Account, DVS HGV Safety Permit etc.).

Once base details are entered, the 'CHT planning system' will automatically restrict the loading of a vehicle or trailer such that the weight or capacity maximum cannot be exceeded. This same system will also automatically check that the vehicle to be loaded also complies with any route restrictions and/or permissions that are required. Once the planning process is completed / confirmed, the 'CHT planning system' will produce a summary of 'delivery and payload weights' by load sheet.

An example of a completed vehicle load sheet / summary is included in this section of the manual, together with a screen print on how a vehicle or trailer maximum weight and capacity limit is first identified then recorded on the 'CHT planning system' with its associate CHT Birth Certificate.

A copy of the Company's adopted procedure for purchasing new vehicles, comprising flowcharts documents can be found under 'V4 – Vehicle Tax' of the manual.

# CHT 'Back Door' Loading Team Responsibilities

A team of dedicated MHE trained 'back door' loaders are also required to act as a sense check that the load sheets allocated to a vehicle or trailer can be loaded safely whilst remaining within its weight or capacity maximum. All loaders are briefed on principles of safe vehicle loading and trailer loading. These principles are further reinforced via 'Toolbox Talks' refresher training / information screens.

All 'loaders' operating CHT MHE are required to undergo periodic in-house training with a CHT MHE qualified instructor / assessor. Copies of the 'loaders' certificates of training, together with full test results are held within the Company's bespoke 'Training Database', with copies of the certificates held on the individual's personnel record.

# CHT Driver CPC Training, Induction & Refresher Training

As a registered member of the RTITB Master Driver for CPC Consortium, and an approved trainer, CHT conduct all necessary driver CPC training in-house. Training modules are purposely designed to cover a variety of transport related issues, including elements focussed on the requirements of 'Safe Vehicle Loading' – [refer 'D4 – Professional Development' for CPC modules and related course content].

The principles of Vehicle Loading and load security are fully covered at Driver induction and included in a statement in the 'Drivers Handbook'. This policy is supported by a range of risk assessments (including 'RA086GEN – Load Safety', and RA105GEN – Securing Abnormal Loads) which are designed for safe/secure loading on specific vehicle types.

In 2020, all CHT drivers attended a '**Driver Workshop**' inhouse presentation, which covers a range of driver awareness subjects including the importance of complying with the Company's '**Load Safety**' policies and procedures.

### V5.2 Load safety for PCV

FORS Annex 3 'Glossary of Terms' define "PCV" as a: "passenger carrying vehicle – a passenger vehicle with more than eight passenger seats."

CHT do not operate any 'Passenger Carrying Vehicles'.

### V5.3 Load safety for vans

FORS Annex 3 'Glossary of Terms' define "VAN" as a **goods vehicle** up to 3.5 tonnes gross vehicle weight.

Whilst CHT operate two vans as "goods vehicles" required to deliver customer goods, CHT drivers of such vans are required to observe and adhere to all Company policies and procedures as set out and described under 'V5.1 – Load Safety for HGV'.

[CHT also operate four Workshop vans to support CHT's its 'in-house' HGV vehicle maintenance facilities located in Skelmersdale and Witney. Whilst these vans are not used as 'goods vehicles', Workshop drivers are still required to observe and adhere to all Company policies and procedures as set out and described under 'V5.1 – Load Safety for HGV', and as risk assessed under 'RA086.GEN – Load Safety.]

# V5.4 Load safety for cars

FORS Annex 3 'Glossary of Terms' define "CAR" as a passenger vehicle with up to eight passenger seats.

Whilst CHT operate 3 Company cars, these cars are allocated to staff and are not to be used to deliver customer goods. But irrespective, car drivers are still required to observe and adhere to all Company policies and procedures as set out and described under 'V5.1 – Load Safety for HGV'.

# V5.5 Load safety for P2W

FORS Annex 3 'Glossary of Terms' define "P2W" as a powered two-wheeler vehicle, including motorcycles and mopeds.

CHT do not operate any 'P2W' vehicles.

### **V6 – Vehicle Safety Equipment**

#### Vehicles

All CHT vehicles over 3.5 tonnes gross vehicle weight are fitted with safety equipment to help protect vulnerable road users, including:

- side-under run protection fitted on both sides of vehicles.
- Class V and VI mirrors fitted to all vehicles; and
- prominent signage to the rear of the vehicle to visually warning other road users not to get too close to the vehicle.





... and fitted in compliance with Safer Lorry Scheme requirements.

In addition, started July 2022, all CHT vehicles are being refitted with an upgraded **Samsara** digital cloud-based vehicle tracking system, with integrated forward facing in-cab camera.

The purpose of this system is to record images (inside & outside cab) for the purpose of accident prevention and to reduce accident repair costs in event a CHT vehicle is involved in a preventable RTA.

In the event of an RTA, camera footage can be downloaded instantly by the Traffic Office for purposes of informing CHT's insurance company, thereby helping towards limiting potential liability for third-party insurance claims against the Company.

- The Samsara tracking system is connected to <u>both</u> the vehicle tacho and engine management system and provides in real time analyse information about a driver's driving style, travelling speeds, tachograph information (including driving time, breaks, POA, rest periods etc.), and vehicle maintenance data in respect of the vehicle engine including faults and warning lights etc.
- The in-cab camera uses "AI" (Artificial Intelligence") software and will detect real time driving events such as: speeding/over speeding, harsh braking/cornering/turning, potential collision risk etc., amongst many other event detection features.

When the 'Al' software senses such events, a short 15-second clip is automatically stored for a 'Traffic Manager' to review. This enables Traffic management to promptly address issues of concern in respect of a driver's 'driving standards' by providing further education and coaching.

Utilising the FORS template provided, CHT has recorded all vehicle safety equipment fitted to the current fleet, a copy of which in filed in this section of the manual.

## **HGV Direct Vision Standard (DVS)**

CHT are aware that all HGVs over 12 tonnes entering or operating in Greater London need to be rated against the HGV Direct Vision Standard (DVS) and compliant vehicles also need to be registered for a DVS HGV 'Safety Permit'.

In preparedness to meet these new requirements, back in Autumn 2020, CHT had engaged in an exercise of cross checking with vehicle manufacturers to ensure that each CHT registered 'fleet vehicle' over 12 tonnes had been fitted with a 'Euro 6' engine and had a minimum DVS star rating of '1' (one) to comply with and be permitted to enter Greater London from 1st March 2021, on which date enforcement by Transport for London ["TfL"] will be applied. Those vehicles that exactly matched both criteria were then registered by CHT with TfL, and each has since received a 'DVS' HGV 'Safety Permit'.

For those older 'Euro 6' engine but DVS 'non-compliant' vehicles with a '0' (zero) star rating, CHT then embarked on a programme of safety equipment upgrades on these vehicles, many of which were upgraded <u>beyond</u> the minimum kit required by TfL for a 'Safety Permit', and where so upgraded these vehicles now meet the FORS 'Silver' compliant standard. To date, the CHT national fleet comprises of 102 'Euro 6' engine vehicles, of which 63 are fully registered with TfL and have been issued with a DVS HGV 'Safety Permit' expiring 24th October \*2024.

In 2024, TfL have stated that the HGV Safety Permit requirement will be further strengthened, when it is proposed [by TfL] that the minimum DVS rating will be increased to 3 (three) stars. This TfL review will consider any additional technology or safety equipment that was not available in 2020. This will then become known as the 'Progressive Safe System'. This said, TfL have also stated that any proposed updates to the 'Safe System' for 2024 will be subject to public consultation in 2022.

### **Policies**

CHT's 'Vulnerable Road Users Policy' forms an integral part of the Driver induction process, and this policy is included in the 'Drivers Handbook', and a copy of this handbook is given to each driver at their induction.

Within this 'Drivers Handbook' all CHT drivers are required to conduct a daily vehicle check, which provides for the checking of 'load security protection' including but not limited to checking:

- Windscreens, mirrors, lights, reflectors, warning signage and number plates for damage, and that they are clean and not obscured.
- Brakes, lights, indicators, in-cab cameras and steering for correct functioning.
- Load restraints (such as ratchet straps) and load restraint systems (such as lashing points, anchor points, bulkheads, and curtains) that they are fit for purpose and defect free.

A copy of the driver 'vehicle / trailer daily inspection' form is included under 'V2 Daily Walkaround Checks' of the manual.

### **V7 – Tyre Management**

### Tyre Management Policy

The Company's 'Tyre Management Policy' commits CHT to ensuring:

- its tyre selection and usage are recorded, monitored, and managed; and
- that the management and use of tyres is undertaken in a safe, efficient, and environmentally responsible manner.

The policy also sets out the Company's 'Key Objectives' and how CHT drivers now play an integral part in helping the Company to achieve these objectives. A copy of this policy is in this section of the manual. 'Tyre Usage Reduction' guidance to drivers has now been added to the 'Drivers Handbook'.

### <u>Tyre Condition – daily inspection checks</u>

#### Drivers

Tyre condition including tyre inflation, damage or wear is checked and recorded on the daily vehicle inspection check form, completed by the CHT driver as part of the preshift daily vehicle check. Tyre pressures are stated on the vehicle or trailer.

This policy requirement is affirmed within the 'CHT Drivers Handbook' / Section 3 under the section header 'Vehicle Safety, Maintenance & Safety Checks' & 'Minimum daily vehicle checks', a copy of this handbook is given to each driver at their induction.

Drivers who <u>do not</u> complete daily checks may be subject to the Company's disciplinary process. CHT's in-house CPC training programme includes modules on daily vehicle and tyre checks as part of this programme.

## Workshop Staff

As an essential part of the CHT Workshop routine service arrangements set in place, special attention is given to tyre condition (including wear and tyre depth) to facilitate tyre rotation and ensure tyre longevity. This information is fully recorded on the VC10 ('motor vehicles') or TC10 ('trailers') maintenance inspection report.

The Workshop maintain a record of tyre usage by vehicle and have a documented system for tyre disposal and recycling. They also maintain a small stock of tyres to facilitate in-house tyre replacement.

### Tyre Performance

CHT work closely with its main tyre supplier Michelin and as part of an ongoing joint initiative, fully engage with them in conducting controlled tyre trials to test performance and durability of new Michelin tyres on the market, and combinations of tyre type trials to see if this can result in improved performance 'mpg' and tyre depth durability.

## **Drivers**

### **D1 – Licensing and Qualifications**

#### Procedures & Policies

It is CHT policy to check and copy all new drivers' licences at job interview, and if hired, these are recorded and filed as part of their personnel record.

Post appointment, CHT will routinely check and record all driving licences to ensure that its drivers are both properly licenced to drive its vehicles and appropriately qualified to operate its equipment. This basic policy requirement is set out under 'Section Three - Road Safety' of the 'Driver Handbook', a copy of which is given to the driver at their induction. A copy of the 'Driver Eyesight Test' & 'Driving Licence Check' form itself is in this section of the manual.

Stated within 'Section Two – Driving Standards' of the 'Drivers Handbook' is a requirement for all drivers to inform CHT of any transport related infringements or breaches, including but not limited to reporting any licence endorsements incurred. Copies of any such endorsements and disqualifications are retained on file by the Company.

[Please refer also to 'D6 Health & Eyesight' for further details on policies adopted].

### Frequency of checks

Checks are carried out quarterly by the Jaama 'Key 2' Fleet software when prompted by the nominated 'competent person'.

More frequent Driving Licence checks will be carried out by the Company where drivers have incurred 6 penalty points or more on their Driving Licence. Those drivers with more than 9 points or more on their Licence will be checked monthly.

A full copy of the driver's licence check is retained on file, together with copies of previous licence checks up to a maximum of 2 years. Key 2 holds licence checks for CHT Drivers, this information can be exported on request.

## Additional checks - CPC training

As a pre-requisite for drivers being eligible to participate in an inhouse trained 'CPC' training course, the CPC trainer will routinely check the driving licences of all participants, to ensure that they are suitably qualified to drive their Company vehicle.

Secure data source: HR Office / file: Licences

Document source: 'Driver Eyesight Test & Medical Declaration' form

Web based source: DVLA driving licence checking service / Jaama 'Key 2'

## D2 - Driving Standards

#### Preamble

As a responsible Transport & Logistics Company and long-standing member of the FTA (Logistics UK), CHT remain committed to ensuring that its drivers always drive

with the utmost care, considering both themselves and other road users (particularly vulnerable road users) to reduce the risk accidents, which could otherwise result in injury or death to either themselves or others.

The Company's expectations on 'Driving Standards' are fully set out in the 'H&S Policy' and 'Drivers Handbook'.

In support of these key Company policy documents, CHT has invested in and places great emphasis on its 'in-house' 'Driver Training' programme, where qualified trainers will routinely conduct individual 'Driver Road Assessment tests' to ensure that a good and courteous standard of driving is being maintained by each of its drivers.

This programme is further supplemented by a range of other 'training' initiatives, including the careful pre-selection of bespoke driver CPC modules on subjects specifically related to 'road safety' and 'driving conduct'. In addition, the Company requires all its drivers undertake annual FORS e-Learning training and to attend its 'Toolbox Talks' training sessions.

[refer also 'D3 – Staff Induction' & 'D4 – Professional Development']

### Vehicle telematics (Samsara)

Started July 2022, all CHT vehicles are being refitted with an upgraded **Samsara** digital cloud-based vehicle tracking system, which is connected to <u>both</u> the vehicle tacho and engine management system and provides in real time analyse information about driving behaviour.

The in-cab camera uses "AI" ("Artificial Intelligence") \*software and will detect real time driving events such as: speeding/over speeding, harsh braking/cornering/ turning, potential collision risk etc., amongst many other event detection features. Sample Samsara 'Safety Monitoring' and other analysis reports can be found in this section.

\*When the 'AI' ("Artificial Intelligence") software senses such events, a short 15-second clip is automatically stored for a 'Traffic Manager' to review. This enables Traffic management to promptly address issues of concern in respect of a driver's 'driving standards' by providing further education and coaching.

## Risk Assessments and Safe System of Working (SSoW)

All transport related activities are fully risk-assessed, and where appropriate will be supported with Work Instructions (or 'SSoW) which fully prescribe the correct procedure CHT staff are required to adhere to, whilst the activity itself is to be carried out in accordance with their training, including 'on the job training'.

[refer also 'M8 – Health & Safety'

### 'Health & Safety Policy Statement'

Drivers are required to comply with all relevant legislation as referred to and laid down in the Company 'Health and Safety Policy Statement'. This statement is made available to all staff and displayed on all Company notice boards, and a summary page

version is included in the 'Employee Handbook pack' a copy of which is provided to all staff at induction.

[A copy of the Company 'Health & Safety Policy Statement', 'Drivers Handbook', and 'Employee Handbook' are included in 'M5 – Communication'.]

This same 'Health and Safety Policy Statement' includes specific reference to:

- 'Mobile Phones / Audio or Video Equipment'
- 'Road Safety'
- 'Safe Plant and Equipment' with reference to trailer coupling & brake lines
- 'Transport / Mobile Equipment'
- 'Working Hours' with reference to 'Working Time Regulations'
- 'Workplace Traffic Management' with reference to daily checks, housekeeping, taking regular beaks, mobile phone, comply with legislation etc.

... and the policy itself is subject to regular review and is communicated to staff

### <u>Drivers Handbook (...incorporating 'Driving Standards')</u>

### **Driving Standards**

From the outset of their employment with CHT it is an expected prerequisite for all drivers working for the Company to have and to adopt, and to maintain throughout their employment with the Company good and courteous 'driving and behavioural standards', giving due allowance for others' errors.

Drivers are informed that CHT **will not** expect to receive **complaints** about their driving technique from members of the public **but will** expect to receive **compliments** where deserved.

These basic policy requirements are set out under 'Section Two - Driving Standards' of the 'Drivers Handbook', which specifically refers and sets out the Company's expectation that CHT drivers will comply with all relevant legislation and drive within the 'Highway Code' (copies of which are made available on Office 365 / SharePoint and Drivers PC).

#### **Vulnerable Road Users**

CHT drivers are required to take extra care to avoid collisions with 'vulnerable road users', including cyclists, motor cyclists, roadside workmen, pedestrians, wheelchairs, mobility scooters, and equestrians.

This policy requirement is set out under 'Section Three - Road Safety' of the 'Drivers Handbook', which also includes a section on what the driver is to do in the event of a road traffic accident, and how and when it is safe for a driver to use in-cab technology.

### Policy review & changes

Following a policy review of any 'Transport' related matter (including a review of 'Driving Standards'), should an amendment to existing content or additional content be required, an updated copy of the 'Driver Handbook' will normally be issued to each

CHT driver, who will be required to sign a register confirming receipt (an example of this register is in this section of the manual).

For 2023, the 2022 Drivers Handbook was reviewed and deemed to be up to date and relevant.

For 2022, the Drivers Handbook' was amended to include updated driver pay rates and other minor text changes to add greater emphasis.

### **Driver Training**

The Company's expectation for its drivers to maintain from the outset professional driving standards forms the very basis of the CHT 'Driver Induction' programme.

This policy is reinforced by CHT through its refresher driver training programmes, including 'Toolbox Talks' and is a prominent feature in CHT's in-house trained \*CPC driver training', whose individual modules are purposely selected to include elements on how to achieve / maintain good 'driving standards' and having good awareness of vulnerable road users (particularly when driving in rural and urban environments).

For example, in 2022 CPC in-house training was focussed on modules specifically associated with 'Reducing Incidents on Different Road Types & Dealing with Common Emergency Situations. Whilst in 2021, CPC in-house focussed on 'Dealing with Road Traffic Incidents & Managing Driver Behaviour to Reduce Incidents'.

#### **Driver Road Assessment Tests**

Prospective new drivers to CHT are required to undertake a 'Driver Road Assessment test' by an inhouse qualified trainer to demonstrate / prove their driving capabilities, correct use of the vehicle and good general driver awareness.

If successful and post appointment, a CHT driver is required to undertake an annual 'Driver Road Assessment test'. If a driver has been involved in either a vehicle incident or a vehicle accident, they may be required by the Company to undertake an additional test.

Whenever a driver is reallocated to a different class of vehicle or make, and as part of the Company's 'Vehicle familiarisation' procedure, he/she will normally be required to undergo another 'Driver Road Assessment test' in their 'new' vehicle. A copy of the 'Driver Road Assessment test' is in this section of the manual.

### **Driver infractions**

CHT drivers are made aware that their 'driving standards' will be monitored and may be held personally accountable by the Company for reimbursing it for any driver infractions directly attributable to their negligent actions which results in a fine or penalty charge notice 'PCN' being received by the Company, and in addition may be subject to disciplinary action being taken against them. This policy requirement is set out under 'Section Two – Driving Standards' of the 'Drivers Handbook'

#### Vehicle Accidents

CHT drivers are issued with and are required to retain in their cab an 'Accident reporting pack'. This pack outlines the correct procedure the driver is required to follow in the event of a vehicle accident and includes a tear-off slip which the CHT driver is required to give to the other party involved in the accident which confirms the contact of CHT's insurance provider NFU.

[refer also 'O3 – Road Traffic Collisions'.]

#### D3 - Staff Induction

### **CHT Policy Commitment**

CHT are committed to ensuring that <u>all staff</u> (not just drivers and line traffic managers) receive adequate training, have the aptitude and are fully competent to do their tasks.

This is an absolute commitment set out by the Company in its 'Health & Safety Statement', a copy of which is included in 'M5 – Communication' of the Manual, a summary copy of which is provided to all staff at their induction.

Underpinning this policy commitment is the Company's: (a) **Staff/Driver 'Induction' Programme**, (b) **Driver Assessment tests** (including skills training & licence check carried out prior to employment), and (c) **continuous professional development** and **appraisal**, each is more fully described under the various heads set out below.

A training matrix and professional development plan has been prepared for all employees... refer also 'D4 – Professional Development'.

### Prior to Appointment and Induction

Prior to the appointment and induction of staff, and forms part of CHT's interviewing process, it is established Company policy to check and ask for \*evidence of all necessary licences, qualifications, skills, and competencies that are (or may be) required to fulfil the advertised job role/description criterion. At interview, prospective drivers will be asked if they have any secondary employment that could impact on their working time and driver's hours.

In the case of prospective drivers, they are required to undertake a driver eyesight test (with result recorded) before then undertaking a pre-CHT 'Driver Road Assessment test' to demonstrate / prove their driving capabilities, correct use of the vehicle and good general driver awareness.

[\*Newly appointed drivers are required to bring with them and provide original evidence of their driving licences and relevant qualifications ('CPC' in the case of a 'driver), relevant training and competencies etc. when they first start for CHT and report for Induction, copies of which are retained on file and within SAGE HR.]

#### Induction

CHT staff whether they be permanent or temporary employees, (drivers, warehouse operatives, or office based), <u>are all required</u> to complete an induction programme. The relevant Manager (or nominated competent person) takes the first session on Company history, during which the inductees will receive all necessary training and be introduced to and, be made aware of, all relevant company policies pertaining to the job role they have been appointed to carry out on behalf of the Company.

The relevant Manager (or nominated competent person) then takes all new employees through manual handling, housekeeping, food safety, COSHH and fire safety topics, requiring them to complete an 'Induction Form' and GMP test.

For drivers, our in-house CPC trainer, (RTITB qualified) will then focus training on vehicle familiarisation (... including tail lift operation & refuelling), loading & security, daily vehicle checks, road safety (...including awareness of vulnerable road users, Working Time Directive, workplace accidents, vehicle breakdowns, road traffic accident reporting, safe and economic driving etc.

All newly inducted drivers must complete the FORS eLearning module on 'Security & Counter Terrorism', together with a FORS 'safety related' eLearning module.

A copy of the Company's 'New Starter Induction' presentation together with copies of the staff/driver induction forms (with each induction form detailing the training requirements to be completed at Induction) are included in this section of the manual.

### On the job training

As part of new driver induction process, all newly appointed drivers are 'buddied' with an experienced CHT driver during the first week of their engagement.

During which time the new driver will become familiarised with:

- the various routes
- mix of customer contract types
- the vehicle type itself (including correct use of the vehicle's tail lift and associate equipment including load restraints)
- pre-delivery daily vehicle inspection checks
- defect reporting
- refuelling
- etc.

### **D4 - Professional Development**

### **Policy**

The Company's H&S policy requires that all CHT employees will receive all appropriate information, instruction (including job specific training) to enable them to perform their duties safely whilst at work.

Much of this training will take place at staff Induction but this training is further supplemented by ongoing 'Professional Development' training (as determined by the Company's training 'Matrix'), which identifies the bespoke training requirements to be undertaken by employees each determined according to their specific job role.

For CHT 'Traffic Managers' and 'Drivers', this 'Professional Development' includes their engaging in annual CPC training and the requirement to complete a FORS 'Safety' related eLearning module each year.

A copy of the 'CHT Training & Professional Development Matrix' and CHT's Training Policy is filed in this section of the manual.

#### Post Induction

Post staff induction, Company policies and key policy changes are notified to staff and reinforced through CHT's refresher and / or bespoke training programmes, including the use of 'Toolbox Talks' which particular focus on the health & safety of both employees at work and others... including vulnerable road users (refer also FORS 'Toolbox Talk D5 'Health & Safety', D6 'Driver Fitness & Health', and V7 'Vulnerable Road Users Safety').

## **CPC Training**

As a registered member of the RTITB Master Driver for CPC Consortium, and an approved trainer, CHT conduct all necessary driver CPC training in-house. Training modules are purposely selected to ensure CHT's drivers are kept up to date of appropriate regulatory knowledge, and to provide awareness of new industry initiatives aimed at improving national driving standards.

## Continuous Training, Assessment & Appraisal

In the case of day to day 'Traffic management', CHT requires that all drivers and traffic line managers undergo approved and continuous progressive training and professional development. Most of the training is conducted inhouse by an RTITB accredited (JAUPT approved) trainer.

In 2020 for example, CHT drivers attended a '**Driver Workshop'** inhouse presentation, which covers a range of topical 'driver awareness' subjects including the importance of:

- 'Daily Vehicle Checks' & Defect reporting
- Load Safety
- Navigation & ULEZ

- Tachograph Hours / Regs
- Traffic Infringements
- In-Cab Technology
- Accidents & Incident reporting

The 'Appraisal Record' form itself reviews the progress made and performance by the staff member since their last review, appraises their key strengths and weaknesses, and identifies any training requirements needed, outlining the type of training to be undertaken and when it is to be received.

Between such appraisals, there may be a requirement for drivers to engage in remedial training to rectify any deficiencies identified through reported collisions or previous training undertaken.

Copies of recent example CPC module certificates completed are in this section of the manual.

#### Training records

All staff training, including induction and refresher training, together with relevant skills and competencies are entered in a bespoke 'Training database'. Certified evidence of staff skillsets and competencies are held on file within the same database and within Sage HR.

The 'Training database' enables Managers to ensure that enough employees are trained with the relevant skills for their jobs, including skills cross over training to cover for staff absence due to holidays and sickness.

## FORS eLearning

CHT drivers are required to undertake:

- at least one 'safety related' eLearning module each year, choosing from:
  - 'Cycle Safety'
  - o 'Bridge Smart'
  - 'Pedestrian Safe'
  - 'Smart Driving'
  - o 'Van Smart'
- the FORS Security & Counter Terrorism eLearning module every 2-years.

[...as detailed in the 'CHT Training & Professional Development Matrix' for drivers]

### D5 - In-cab Technology

### **Policy**

The Company's 'Mobile Phone Policy' sets out and reinforces the message that it is **illegal** to use a hand-held mobile phone, radio communication or other "in-cab technology" whilst driving. A copy of this policy is in this section of the manual.

### Use of In-cab Technology

Whilst all CHT vehicles are fitted with hands-free and 'Samsara' satellite navigation equipment, drivers are required to comply with all relevant legislation as referred to and laid down in the Company 'Health and Safety Policy Statement', section 'Workplace Traffic Management / Transport', access to which is provided at induction and is further displayed on all noticeboards. This same policy statement includes specific reference for **drivers not to use mobile phones whilst driving**.

For drivers, this basic policy requirement is further affirmed and reinforced within the 'Drivers Handbook' under the section header 'Mobile Phones and In-Cab Technology', which specifically states that: "it is unlawful to use a hand-held mobile phone, radio communication or other 'in-cab technology' whilst driving".

A copy of this handbook is given to each driver at their induction, which includes as 'Appendix One', ref. RA056GEN - General Hazards / Risks, 'Relating to Drivers and their Vehicles', and which refers specifically to:

- 'RA062GEN Driving' (which strictly forbids the use of in-cab technology by CHT drivers whilst their vehicle is moving); and
- 'RA083GEN Use of Mobile Phones & In-Cab Technology'

.... copies of which are in this section of the manual.

An integral part of basic driver induction, all drivers are fully briefed about the correct use of 'in-vehicle technology' and are made aware that the hands free and 'Samsara' satellite technology provided by the Company and fitted in the cab, are simply aids to help them go about their duties safely and efficiently and are **not** a means to be distracted by.

Full details of the 'in-cab technology' fitted by the CHT workshop to a CHT vehicle is recorded on the 'CHT Birth Certificate', a copy of which is in 'V4 – Vehicle Tax' of the manual.

[see also **D2 – Driving Standards**].

Secure data source: S: Schedules / Vehicles / Vehicles

### D6 - Health & Eyesight

### Policies & Procedures

The Company's 'Driver Health & Eyesight Policy' commits to ensuring that its drivers are legally able to undertake their role as a professional driver and informs drivers that CHT will conduct regular driver health and eyesight tests and driver 'Driving Licence' checks to ensure that they are both legal and feel medically able to carry out their professional duties on behalf of the Company. A copy of this policy is in this section of the manual.

The Company has a strict code of conduct relating to 'drugs and alcohol at work', as laid down in the 'Employee Handbook', 'Drivers Handbook', 'Health and Safety Policy Statement', & supported by the Company's "Substance Abuse (Drug & Alcohol Policy'. CHT staff suspected of being under the influence of drugs or alcohol will be subject to disciplinary action being taken against them up to and including summary dismissal. A copy of the 'Substance Abuse (Drug & Alcohol Policy' is in this section of the manual.

[A copy of the 'Employee Handbook', 'Drivers Handbook', and the Company's 'Health and Safety Policy Statement' is in 'M5 – Communication' of the manual.]

All staff within the CHT workplace environment, whether they are engaged within the 'Warehouse', 'Workshop', 'Office' or are driver / transport related, are required to report to their line manager if they infected with any communicable disease (i.e. food poisoning, dysentery, typhoid, Covid), or any condition which may affect their ability to comply with the requirements of their work, including for drivers back injury and eye sight problems (refer 'Employee Handbook'/ 'Hygiene').

Similarly, all staff within the CHT workplace environment, whether they are engaged within the 'Warehouse', 'Workshop', 'Office' or are driver / transport related, are required to report to their line manager if they are feeling **fatigued** and/or suffering from **mental health** problems. A copy of the Company's 'Mental Health Policy' and Fatigue Management Policy' is in this section of the manual.

### 'Traffic Office' Shift Managers role

All CHT 'Traffic Office' Shift Managers have been briefed on how to recognise driver impairment through alcohol and drugs, driver fatigue and eyesight issues and are expected to react appropriately when such issues are found.

If **alcohol impairment** is suspected, the Company have access to a breathalyser kit to assist them in making an informed decision as to whether (in their reasonable opinion), a driver is fit and able to drive and should be allowed to continue to carry out their normal duties. Shift Managers are required to 'err on the side of caution' as part of the Company's 'duty of care' to its employees and will suspend any driver reasonably suspected of being under the influence of **drugs or alcohol**.

The Company is deeply mindful that conditions such as 'sleep apnoea' are a particular issue for drivers and has \*directly experienced and managed individual cases where such a condition has been identified, working in conjunction with trained medical professionals.

[\*It was the very act of the 'Traffic Office' investigating and following through on a vehicle accident that a CHT driver was found to be suffering from the condition 'sleep apnoea'.]

Recognising the importance of the subject matter, 'driver fitness and health' related issues form parts of modules of the driver CPC training programme, including one module referenced as driver 'Personal wellbeing'.

Drivers are made aware that they are required to inform the Company should they be suffering from **fatigue** (for example having been up all night with a restless child). The Time Management System (TMS) has the facility to record any subsequent time off as "Fatigue" by the use of a "T" code on the relevant driver's attendance record. The attendance records are checked monthly by the HR Office, and any repeat occurrences are brought to the attention of Paul Street, Commercial Manager.

### **Eyesight Test & Medical Declaration**

It is Company policy that drivers of Company vehicles (including vans and cars) are required to undergo a mandatory eyesight test from 20.5 metres or sit an approved computerised driver eyesight test. These eyesight tests are carried out by the 'Traffic Office' every 6 months or in the event of drivers being involved in a blameworthy road traffic collision. The date and result of these tests are recorded together with details of who supervised the test. Drivers who fail an eyesight test will be sent to an optician.

This form also encompasses a 'medical declaration' requiring the driver to declare if there has been any change in their health which could affect their entitlement to drive.

[CHT 'Night Workers' are also required to complete a 'Health Assessment Questionnaire', a copy of which is in this section of the manual.]

## Return to Work Interviews & Post Traffic Incident / Accident Investigations

A consequential effect of line managers directly implementing, administering, and monitoring workplace health & safety and staff welfare issues, including conducting 'return to work' interviews following periods of staff sickness and absence, CHT line managers are able to be aware, take into consideration and react appropriately to any condition, illness, or affliction which may affect an individual's ability to comply with the requirements of their work.

Similarly, a consequential effect of line managers investigating and following through on any reported personal or traffic related 'incident' or 'accident', they can react and take all appropriate action including requiring the driver to visit an optician for a full eyesight test if it is suspected that the driver may have a vision impairment and may have been a contributory factor.

#### **COSHH & PPE**

The Company's 'Health & Safety Policy' statement includes separate policies for COSHH and PPE.

### **Training Modules**

As a registered member of the RTITB Master Driver for CPC Consortium, and an approved trainer, CHT conduct all necessary driver CPC training inhouse. \*Training modules are purposely designed to cover a variety of transport related issues, including several elements focussed on the requirements of driver's health (including mental health and wellbeing).

[\*For 2022, for example, CPC in-house training was focussed on modules specifically associated with 'Understanding Influences on Driver's Physical Health'. An example CHT driver completing the 2022 CPC training (the 'Record of Attendance') is filed in this section.]

Secure data source: Central Records / DD / Eye tests & Medical Declaration Secure data source: Central Records / Training Database / CPC driver training

Secure data source: R: Accidents / Schedules / Accidents database

Secure data source: TMS system Secure data source: SAGE / HR

### D7 - Drivers' Hours and Working Time

### Policies & Procedures

Through its 'Health & Safety Policy' statement the Company commits to, observes, and fully complies with all relevant legislative requirements, including strict adherence to the requirements of the 'Drivers Hours' and 'Road Transport Working Time Directive'.

More specifically, CHT's 'Driver Working Time & Hours' policy reminds drivers of their legal obligations to manage their driver hours (including hours worked under any secondary employment) and total working time. In addition, 'Section One – Hours of Work' of the 'Drivers Handbook' details how this is to be managed by the Company.

### Management of Working Time

To achieve this, the Company purposely maintains comprehensive and all necessary records within the 'Traffic Office', which will include a detailed record of driver shifts, their vehicle load sheets and workload, and actual hours worked as recorded on the driver's digital card. These records are kept electronically on file for 2 years and are easily available for reference or scrutiny.

Due to the importance placed of managing the precise requirements of the 'Working Time' and 'Road Transport' Directives, the Company has installed specialist equipment and appointed a specialist software company 'TruTac' to record / analyse and monitor all driver's hours including 'Working Time Directive', protecting the Company whilst ensuring that CHT drivers remain fully compliant and are operating within the confines of these directives.

At the completion of their delivery run, CHT drivers are required to report directly to the 'Traffic Office' and download their **digital driver's card** via the **TruTac card reader**. In addition, drivers themselves are required by the Company to maintain a 'Driver's Time Sheet' of hours worked, including down time and rest breaks etc. The time sheet is then to be handed in to the 'Traffic Office' at the end of each working week, and then subject to separate scrutiny by a Traffic Office 'Shift Manager'.

The 'Driver's Time Sheet' is purposely designed to be easily maintained by the driver and for total hours worked to be computed by them, such that a driver will always be fully aware themselves (and therefore alerted) to their current position in respect of their adherence to the requirements of the 'Working Time' and 'Road Transport' Directives. A copy of the 'Driver's Time Sheet' is in this section of the manual.

Whether it is as a direct consequence of the Traffic Office 'Driver's Time Sheet' check, or by way of a separate management report received directly from the TruTac monitoring system, the Company will take all necessary and appropriate action up to and including disciplinary action, as is required, to fully address all incidents where driver hours are exceeded and / or driver rest breaks have not been adhered to.

A copy of the written process followed by each Operational Centre is in this section of the manual.

### **Driver Infringement**

All incidents of driver infringements are detailed / documented on a 'TruTac / D14 – Period Tachograph report' and are immediately investigated by the 'Traffic Office' Shift manager with the individual driver concerned.

In all cases where a driver infringement of stipulated rest breaks has occurred, a formal record of the infringement will be confirmed in writing and entered onto the offending driver's personnel record, the letter itself is signed by both parties and forewarns the driver that any failure by them to observe the 'Working Time' and 'Road Transport' Directive's requirements will make them liable for disciplinary action being taken against them by the Company.

CHT drivers are allowed 'three strikes' for any lapse of adherence to driver's hours and total working time, following which disciplinary action will be taken against them.

### <u>Training Modules</u>

As a registered member of the RTITB Master Driver for CPC Consortium, and an approved trainer, CHT conduct all necessary driver CPC training inhouse. \*Training modules are purposely designed to cover a variety of transport related issues, including several elements focussed on the requirements of the 'Drivers hours' and 'Road Transport Working Time' Directives.

For 2022, for example, CPC in-house training was focussed on modules specifically associated with 'Understanding Smart Digital Tachographs to Reduce Infringements'. An example CHT driver completing the 2022 CPC training (the 'Record of Attendance') is filed in this section.]

## Spare digital print rolls

CHT issue to drivers two spare digital print rolls. All CHT fleet vehicles are now fitted with digital tachographs. Replacement spare rolls issued are recorded on a log.

## **CHT Directly Employed Drivers Only**

Drivers are directly employed by CHT, and they are only engaged to fulfil the customer requirements of the CHT business (i.e., CHT do not outsource its drivers to other companies). This enables the Company to closely monitor the hours its drivers have worked and their workload, and to immediately respond and make all necessary adjustments in its 'vehicle load planning' to ensure drivers hours are not exceeded, and that all necessary rest periods have been observed and implemented.

Currently, no CHT driver is involved in secondary employment, but the question is asked at interview and (after appointment) thereafter the driver's total driving hours worked (including those of any secondary employment) are managed through the Company's TruTac monitoring system. A copy of the driver 's period tachograph report, sample TruTac monitoring reports, and CHT driver infringement letter are in this section of the manual.

## **Operations**

### 01 - Routing

#### **Policies**

Through its investment in staff training and system integration of state-of-the-art DPS technology, the Company is committed to identifying the most fuel-efficient time saving and safe vehicle routes for its appropriately sized HGV vehicles to use, and that ALL routes to Customer sites are planned such that CHT vehicle type (both size of and engine type) are selected to be fully compliant to enter all applicable permit-controlled routes such as the 'London Lorry Control Scheme'.

CHT drivers are informed and aware that:

- Planned routes are to be strictly adhered to unless directed otherwise by the 'Traffic Office' or by an Enforcement Officer, or because of an unforeseen incident arising.
- Planned 'Esdal2' routes for abnormal indivisible loads ["AIL"] must be strictly adhered to. The 'Esdal2' process sets out the specific/precise route/directions to the delivery point to be strictly adhered to by the CHT driver. Any issues arising due to adverse conditions or traffic problems must be immediately notified to the Traffic Office who will need acceptance from the relative police authority prior to any deviation from the 'Esdal2' prescribed route taking place.
- Deviations from a designated, permitted, or controlled route should be justified, and that unauthorised deviations will be investigated by the 'Traffic Office' on the driver's return to base.

To achieve this, CHT has risk assessed and put in place various policies and supporting procedures to identify and apply the best routes drivers are to take to optimise performance, more specifically:

- ✓ CHT's Risk Assessment (RA096.GEN) for: "Prescribed and Designated Routes. CHT's 'Prescribed and Designated Routes' policy sets out how routes (including 'AIL' movements) are to be planned, managed by 'Traffic Office' and implemented by drivers.
- ✓ CHT's Risk Assessment (RA106.GEN) for: "Delivering onto Construction Sites'. CHT's SSoW supporting RA106.GEN sets out the specific risks involved when delivering to construction sites. This SSoW also reminds drivers in respect of 'AIL' deliveries, that they must follow the designated route as set out in the 'Esdal2' electronic service notification.
- ✓ CHT's 'Greener Food Manifesto' sets out CHT's environmental policy, and how
  the Company commits itself to upgrading its fleet to be the most fuel efficient, safe,
  and environmentally friendly, committed to minimising environmental impact and
  potential for interaction with vulnerable road users.

Copies of the two policies and risk assessments are filed in this section of the manual.

### Route Planning Process

Efficient 'route planning' is achieved by the use of state-of-the-art specialist 'DPS' software in the **pre-planning** process, whilst CHT drivers are themselves engaged in the **final route planning process** and are given an opportunity (via their **Samsara** device, via email or by calling in) to provide their feedback, and / or request modifications to the pre-planned route, and before customer goods have been loaded on to their vehicle.

These devices also allow CHT to inform drivers of deviations to the planned route after they have left the depot in circumstances such as road closures.

By CHT directly engaging with its drivers beforehand and providing them with the opportunity and means to provide valuable input in to the final 'route planning' process, this has helped CHT to:

- Improve its operational efficiencies (i.e., by delivering more products to more CHT customers whilst travelling less road miles).
- Reduce CHT's operational costs (as less miles are travelled, equating to less fuel (and Adblue) consumed by its vehicles).
- Reduce environmental impact (particularly where Euro 6 engine vehicles are operating in known congestion zones); and
- Reduce and help mitigate against the risk of 'collisions' on routes 'to and from' customer premises by reducing interaction with other road users (including 'vulnerable road users').

## <u>Distribution Planning Software - Routing 'Locally'</u>

All vehicle loads are generated by trained CHT staff utilising bespoke 'DPS' software (Distribution Planning Software). This advanced technology allows CHT to plan its routes 'locally' (at Skelmersdale, Witney & Lenham Traffic Offices) thereby enabling CHT staff to utilise their local knowledge in the planning process, maximising vehicle loads, improving vehicle utilisation, leading to smarter route mapping whilst avoiding known local hotspots or restrictions.

By routing 'locally' this reduces interaction with vulnerable road users and helps to identify localised **vehicle size** more easily and / or **weight restrictions**, and to take into consideration customer availability / accessibility, thereby helping minimise delay and avoid failed customer deliveries and \*overnight parking.

\*Company policy is not to use toll roads or pay parking charges unless it is necessary to do so (perhaps because of a road closure or for operational reasons). This is largely achieved because of CHT 'Traffic Offices' conducting an initial 'safe access check' at customer locations, wherein the route **to** and adequate vehicle parking and safe access **at** the delivery location is checked and affirmed, with all relevant details retained on file. Refer 'O6 – Operational Security' for a copy of the access procedure.

Routing 'locally' also helps ensure that there are never occurrences where a vehicle convoy forms. CHT's policy on 'Vehicle Convoys' is in this section.

#### **Load Sheet**

On completion of the 'DPS' planning process, a load sheet is produced for the CHT warehouse 'back door' team for loading purposes, together with a separate driver's run sheet (or 'drivers manifest') which is printed in route order and contains all relevant driver instructions pertaining to that delivery / collection order.

This load sheet also includes an estimate of duration and distance of the run, so that drivers are made aware of and can therefore comply with **driving hours' regulations**. Copies of the load sheet and drivers run sheet are included in this section of the manual.

#### Vehicles

CHT has fitted 'Samsara' satellite tracking and route planning technology throughout its fleet to both provide a navigational aid to drivers and to facilitate the close monitoring of driver and vehicular performance, to help optimise vehicle use and improve average mpg.

Samsara works alongside an App called 'Sygic' which is used to obtain fuel efficient routes with current traffic updates.

All CHT vehicles designated for London deliveries are registered for the 'London Congestion Charge' & 'DVS' HGV 'Safety Permit', and vehicles over 18 tonnes are also registered for the 'London Lorry Control' (LLC) scheme. All CHT vehicles comply with the LEZ standards for HGV tvehicle exhaust emissions.

Started in 2018, a 'Euro 6' vehicle replacement programme has been put in place by the Company which progressively replaces older CHT vehicles with newer Euro 6 engine vehicles.

Drivers are allocated their own CHT vehicle and will have been briefed on any vehiclespecific issues that they need to be made aware of including (but not limited to) the vehicle's weights and dimensions.

When 'new' vehicles are first introduced to the fleet, the CHT Workshop will produce and issue a 'CHT Birth Certificate'. This certificate confirms all necessary regulatory and vehicle data including its maximum weights and overall dimensions. A copy of the 'CHT Birth Certificate' is in 'V4 – Vehicle Tax' of the manual.

## **Energy Savings Opportunity Scheme**

As part of the Energy Savings Opportunity Scheme (ESOS) 'Phase 1' compliance obligations, CHT completed a 2-yearly 'Transport Energy Audit' in February 2017, which analysed CHT's fuel consumption in the previous year (2016). A repeat 'Transport Energy Audit' was completed in February 2021 (based on '2020' fuel data).

These energy audits identifying/highlighting the year-on-year improvements in energy savings with less miles being travelled by CHT vehicles, as confirmed in the most

recent full ESOS energy audit conducted by 'Carbon Smart' on 4<sup>th</sup> July 2019, and CHT are now registered **ESOS 'Phase 2' compliant**.

Copies of these audits together with confirmation of ESOS 'Phase 2' compliance are included in 'O2 – Fuel, Emissions & Air Quality' of the manual.

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### O2 - Fuel, Emissions & Air Quality

#### **CHT Policies**

#### **Environmental Policy**

CHT's 'Greener Food Manifesto' sets out the Company's environmental policy and its ongoing commitment to reducing its fuel consumption and improving fuel emissions by progressively upgrading its fleet to selecting the most fuel-efficient 'Euro 6' engine vehicles to minimise environmental impact.

This policy commitment extends to all CHT vehicles being LEZ compliant and (where appropriate) CHT vehicles to be registered to comply with all relevant permit-controlled schemes (such as the 'London Lorry Control Scheme' & 'DVS' HGV 'Safety Permit Scheme).

A copy of the Company's environmental policy is in 'O1 – Routing' of the manual.

#### **Engine Idling Policy**

CHT have developed and made drivers aware of the Company's 'Vehicle Idling Policy', which identifies those common situations where idling can occur (such as whilst a CHT vehicle is waiting to access a customer site, and / or during the loading or unloading process), and how to reduce these occurrences.

A copy of this policy is contained in this section of the manual, displayed on all relevant notice boards, and included in the updated 'Drivers Handbook'.

CHT's 'Greener Food Manifesto' environmental policy commits CHT drivers to switching off their engines whilst delivering or collecting or when their vehicles are parked up. These policy principles being reinforced in a 'Toolbox Talk' on 'Vehicle Idling' and a subject regularly highlighted on information screens.

'Vehicle Idling' now forms an integral part of <u>both</u> CHT driver 'induction' training and driver 'refresher' training, and a subject module for inclusion in CPC driver training. In Mid-2023, Drivers carried out a CPC module on Economic drivers which included Vehicle idling.

Newer vehicles now being added to the CHT fleet include 'in-built' technology that will automatically detect all instances of engine idling, and which are set by the vehicle manufacture to automatically switch an engine off after two (2) minutes of idling.

## Vehicle telematics (Samsara)

Started July 2022, all CHT vehicles are being refitted with an upgraded **Samsara** digital cloud-based vehicle tracking system, which is connected to <u>both</u> the vehicle tacho and engine management system and provides in real time analyse information about fuel consumption (including MPG and emissions) and 'live' engine diagnostic data.

Sample real time 'live vehicle info' fuel & diagnostics reports can be found in this section, together with a sample Samsara report on 'vehicle idling events' across all CHT vehicles operating on 8<sup>th</sup> August 2022.

### 'Fuel & Emissions Champion'

Jake Stevenson is the named 'Fuel and Emissions Champion' for CHT in the Company's 'Greener Food Manifesto' environmental policy and on the Company's organisation chart (a copy of which is in 'M4 – Staff Resources').

### **DERV Management**

#### Procurement, Storage & fuel monitoring

With purpose built installed bunkering facilities at its two main transport hubs, located at Skelmersdale in the 'North' and at Jervis House, Witney in the 'South', CHT can procure, receive, and store full tanker loads of DERV.

Fuel drawings are automatically downloaded via 'Fueltek' daily and form the basis of management reports separately monitoring average fuel consumption by vehicle, by vehicle group or by driver etc. Sample average fuel consumption reports are included in this section of the manual.

Each of these fuel installations has a managed and secure fuel dispensing mechanism attached, wherein fuel can only be drawn by CHT drivers against a dedicated 'vehicle ID' fuel card. All fuel drawings are required to be recorded on site at the fuel bunkering facility and recorded on the driver's run sheet.

### Adblue Management

#### **Procurement, Storage & monitoring**

CHT's two main transport hubs each have their own bulk 5,000 litre capacity Adblue storage facilities which enables the Company to procure Adblue in 'bulk' (normally in 2,500 litre top ups).

These Adblue storage tanks are also connected/linked to the 'Fueltek' system, enabling data extraction of both DERV and Adblue consumption by Vehicle Registration Mark (VRM). This data is analysed by the Company which can monitor individual drawings and the ratio between 'diesel to Adblue'.

An example analysis report is included in this section of the manual, wherein it is to be noted that the total CHT Fleet ration between 'diesel to Adblue' is within the \*expected range for a Company operating HGVs.

\*AdBlue consumption is usually between 2–6% for most vehicles, with **diesel** vans and lorries tending to inhabit the upper half of this range at 4–6%. Another way to picture this is that for every 100 gallons of fuel burned, 4–6 gallons of **AdBlue** will be used to reduce NOx levels in the emissions.

### **Driver Training**

#### Induction

From initial induction through to on-going refresher training, CHT drivers are shown DVDs on how they are expected to achieve good fuel economy, including one specifically called 'SAVE IT' produced by Department of Transport / 'Freight Best Practice', comprising (1) an introduction to freight best practice, (2) the road to fuel efficiency, (3) champions of fuel.

#### **CPC** training

A registered member of the RTITB Master Driver for CPC Consortium, CHT's approved trainer can conduct all necessary driver CPC training in-house. Modules are purposely selected by CHT to cover a variety of transport related issues, including elements focussed on correct vehicle use and how drivers can achieve improved air quality and fuel economy.

#### FORS eLearning & 'Toolbox Talks'

Forming part of their 'Professional Development programme', CHT drivers should complete the *FORS LoCITY* eLearning module on fuel economy and attend a FORS 'Toolbox Talk' on the subject: '*Fuel, emissions and air quality*'.

Copies of such eLearning training undertaken and of the 'Toolbox Talk' on 'Vehicle Idling' is contained within this section of the manual.

### Communicating Information = Energy Saving Opportunities

#### Publishing average 'mpg' performance

To help encourage and reinforce the policy message that good fuel economy is vitally important, each month CHT purposely publish on the Traffic notice board average fuel consumptions by vehicle. A sample report is included in this section of the manual.

As a matter of standard practice, CHT constantly seek to maximise vehicular use by seeking 'back haul' loads to minimise 'empty running'. For off UK mainland deliveries, CHT enlist the help of reputable specialist service providers thereby avoiding excessive operating costs.

#### **Engaging with Customers**

To maintain optimum operational efficiencies CHT seeks ALWAYS to minimise 'waiting times' at customer premises. Such waiting time is referred to (in the transport industry) as customer chargeable 'demurrage' for all instances of excessive waiting at customer premises and forms an integral part of the Company's standard 'terms and conditions of carriage' with its customers.

By the right to charge 'demurrage', CHT can proactively engage with its customers to reduce incidents of **engine idling** whilst a vehicle is waiting to gain access to a customer site and during the loading or unloading process. Both elements are measurable, closely monitored and managed by the CHT 'Traffic Office' team and are system reportable.

A copy of CHT's standard 'terms and conditions of carriage' (which refers to the charging of 'demurrage') is included in this section of the manual.

#### **ESOS Compliance**

As part of the Energy Savings Opportunity Scheme (ESOS) 'Phase 1' compliance obligations, CHT completed a 2-yearly 'Transport Energy Audit' in February 2017, which analysed CHT's fuel consumption in the previous year (2016). A repeat 'Transport Energy Audit' was completed in February 2021 (based on '2020' fuel data).

These energy audits identifying/highlighting the year-on-year improvements in energy savings with less miles being travelled by CHT vehicles, as confirmed in the most recent full ESOS energy audit conducted by 'Carbon Smart' on 4<sup>th</sup> July 2019, and CHT are now registered **ESOS 'Phase 2' compliant**.

Copies of these audits together with confirmation of ESOS 'Phase 2' compliance are included in this section of the manual.

### <u>Efficient routing + vehicle technology = reduced waiting times</u>

### Technology - 'DPS'

CHT use bespoke 'DPS software (Distribution Planning Software) in the route planning and scheduling process, enabling CHT staff to:

- Maximise vehicle loads.
- Improve vehicle utilisation.
- Apply smarter route mapping techniques keeping to 'clear roads', avoiding known local hotspots or traffic restrictions; and
- Consider potential waiting times at CHT customer delivery / collection points.

[See also: O1 - Routing]

#### O3 - Road Traffic Collisions

### Prior to appointment

At interview, driver qualifications are checked, and prospecting drivers are asked to declare if they have any unspent motoring convictions and if they have had any collisions both at work and off-duty which involved their engagement with an insurance company and/or the police.

#### Policies

CHT has put in place the required resources, policies and supporting procedures to record and investigate road traffic collisions, incidents, and near-misses.

More specifically, CHT's 'Road Traffic Collision Management' policy provides staff with all relevant information on how:

- Road risk is managed by the Company (stating who does what, when and how);
- Incidents are managed safely, legally and reported to the relevant authorities in a timely manner.
- Incident facts are collated accurately, recorded correctly, and reported to the insurer.
- Vehicles involved in incidents are repaired to a safe and legal state prior to being returned to the road.
- Drivers involved in incidents are assessed for wellbeing and competency to ensure they are able and fit to return to driving duties, and their eyesight will be checked.
- Incidents are investigated to determine primary and contributory factors; and
- Incident facts are monitored to determine and implement remedial actions.

## 'Road Risk Champion'

Nick Risk is the named 'Road Risk Champion' on the Company's organisation chart and is required to have undertaken FORS training on 'Road Risk Management' and 'Collision Investigation'.

To ensure cover, a cross section of additional support for Nick as the named 'Road Risk Champion,' both Eric Marsden (Skelmersdale Traffic Office) and Steve Lidlow (Lenham Traffic Office) have completed this FORS training. A copy of this certification is filed in the section of the manual.

### Reporting

All drivers are required to report accidents as part of their listed duties and responsibilities as laid down in the 'Drivers Handbook', a copy of which has been issued to every CHT driver, and forms part of the CHT driver induction / training process.

All CHT drivers are issued with and are required to retain in their cab an \*accident reporting pack'. This pack outlines the correct procedure the driver is required to follow in the event of a vehicle accident and includes a tear-off slip which the CHT driver is

required to give to the other party involved in the accident, which confirms full contact particulars of CHT's insurance provider NFU.

If In line with the requirements of CLOCS (Construction Logistics & Cyclist Safety) Manager, CHT have amended their accident reporting process and forms to include content from the CLOCS forms & to better align with the FORS 'RTA' reporting template forms & management analysis.]

### Records

All driver and / or vehicle related incidents, accidents, traffic accidents and reported near-misses are all individually documented and recorded on bespoke Company databases including Samsara dashcam footage and system derived relevant 'real time' analysis reports of the event.

'Vehicle accidents' themselves are fully recorded in a bespoke 'Vehicle Accident database'. Each accident is allocated a unique case reference, details recorded on an 'Motor Fleet Accident claim form', internally investigated / documented and thereafter directly managed from initial logging and reporting of an accident through to final resolution and sign-off, this is in cooperation and conjunction with our insurer NFU.

As part of this process final costs are recorded <u>both</u> in respect of insurance claim settlement and, where applicable, CHT own vehicle damage costs (as recorded and itemised on CHT's bespoke 'Workshop' software).

### Investigation

Each reported instance is fully investigated by the respective 'Traffic Office' to its proper conclusion. These investigations are carried out by the qualified Traffic Shift Managers, and where necessary, this in consultation with the H&S Advisor or appointed NFU Claims handler.

As part of the normal investigative process and remedial action taken, and dependant on the exact circumstances and nature of the reported incident or accident, drivers will be assessed by the Traffic Office Duty Manager to ensure that they are fit and able to resume their normal duties and to drive a vehicle. This may involve undergoing a new "Driver Road Assessment test" [see also 'D2' – Driving Standards].

Following an investigation, where this is appropriate, disciplinary action may be taken by the Company against the driver involved in the incident or accident, up to and including dismissal.

## CHT Vehicle Damage

Any vehicle which is damaged because of an accident is to be reported immediately upon the driver's return to the depot. Details of the damage will form part of the driver's statement and 'Accident Report' form filling process.

A 'vehicle defect report' will be raised to initiate any remedial repair work necessary to return the vehicle and / or trailer to full working order and made ready to resume operational work.

As part of the follow-through 'in-house' repair work carried out by the CHT Workshops, a full workshop record is maintained of the repairs carried out, including details of the cost of rectification including parts used and 'labour' content.

Such records may be required and referred to as part of any NFU insurance claim particularly if the vehicle accident was not of CHT's making and the Company is seeking compensation from the third-party insurers for the cost of the rectification works involved.

### **Review and Analysis**

Data on recorded incidents, accidents and near-misses is routinely reviewed and scrutinised against established working practices and written procedures to determine root causes and contributory factors. It is because of each investigation and separate analysis of data that enables CHT to take any 'learnings' and promptly amend its policies, risk assessments and SSoW procedures accordingly.

Copies of the driver 'Accident / Incident report form', 'Investigation pack' and 'Motor Fleet Accident claim form' are included in this section of the manual. A copy of the 'CHT Drivers Handbook' is included in *Section 5* of the manual.

Secure data source: R: Schedules / Accidents

Secure data source: R: Vehicle Accidents / Schedules / Vehicle Accidents + forms

Source: Training / Induction / Drivers Handbook

#### Insurance

The 'Traffic Shift Manager' is responsible for promptly notifying CHT's insurer 'NFU' of all motor insurance claims. Early notification of a potential claim on 'Day 1' is desirable and would normally be phoned through on 'Day 1' by the duty Traffic Shift Manager direct to the NFU 'new claims' line, who will quote a claims ref. number.

Following on from this early notification, and on completion of the Traffic Office investigation into the incident, the reported insurance claim will then be fully documented with supporting photos, together with Samsara dashcam footage and relevant 'real time' analysis reports and notified by email to a dedicated named NFU Claims handler.

This email is 'Cc' copied to the CHT 'Insurance Team' members, one of whom is responsible for maintaining an up-to-date record on the Vehicle Accident database of all communications and documents that have been notified to NFU directly applicable to the claim. An example copy of the Vehicle Accident summary analysis statistics is in this section of the manual.

CHT hold regular insurance and general case review meetings with its insurer NFU, at which all outstanding vehicle accidents will be discussed and appraised, with any learning's taken on board by CHT. These meetings are set to an agenda, and the results of the meeting are confirmed in writing.

Company data held on recorded vehicle accidents is routinely reviewed and scrutinised against CHT's established working practices and written procedures to help us to determine root causes, contributory factors, trends, and cost.

Not all vehicle accidents will result in an insurance claim being made. Indeed, usually accidents only involve minor property damage, such as a broken fence or a bent gate post and such like. In all such instances, CHT much prefer to resolve these issues directly with those parties affected (usually property owners), thereby ensuring a swift resolution for all concerned.

### **CPC Training**

As a registered member of the RTITB Master Driver for CPC Consortium, and an approved trainer, CHT conduct all necessary driver CPC training in-house. Training modules are purposely selected to ensure CHT's drivers are kept up to date of appropriate regulatory knowledge, to provide awareness of new industry initiatives aimed at improving national driving standards, and to act as a \*reminder and refresher to drivers on correct Company procedure to follow in the event of an RTA occurring.

For 2021, for example, CPC in-house training was focussed on modules specifically associated with 'Dealing with Road Traffic Incidents & Managing Driver Behaviour to Reduce Incidents'. An example CHT driver completing the 2021 CPC training (the 'Record of Attendance') is filed in this section.]

### **O4 – Passenger Safety**

#### Preamble

CHT do not operate any 'Passenger Carrying Vehicles'.

#### **Policies**

Set out in the Company's 'H&S Policy' under the section header 'Transport and Mobile Equipment', CHT drivers are informed that passengers are <u>not</u> permitted to be carried in any Company vehicle, apart from other Company employees, unless previously authorised by management. Where authorisation has been granted by the Company, the permitted number of passengers for the vehicle MUST NOT be exceeded.

This policy requirement is further affirmed in the Section 5 of the 'Drivers Handbook' under the section header 'Passengers & Pets'.

[A copy of the 'H&S Policy' and 'Drivers Handbook' are provided to each driver at induction... refer also 'M5 – Communication'.]

More specifically, CHT's 'Passenger Safety' policy underlines these requirements and sets out the obligations of CHT drivers and their passengers intended to help ensure their safety and wellbeing whilst driving. A copy of this policy is in this section of the manual.

This policy is supported by Risk Assessment "RA085GEN – Passenger Safety", a copy of which is in this section of the manual.

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### **O5 – Specialist Operations**

### Preamble

CHT's core business is to provide first class UK based warehousing and distribution services on behalf of its customers.

ALL customer goods stored in CHT warehouses, handled by CHT staff and transported on CHT vehicles are only accepted by the Company on the basis that they are <u>both</u> suitable and compatible (to one another) to enable their safe 'shared storage' (stored within the same warehouse) and safe 'shared distribution' (distributed within the same vehicle) <u>without</u> requiring any other 'specialist measures' to be taken by the Company.

Where warehousing services are to be provided by the Company, ALL customer goods are stored in registered 'food grade' approved warehouses, which are routinely audited to BRCGS and Soil Association Standards.

### **General Operations**

CHT is registered as an Upper Tier Carrier dealer with the Environment Agency.

CHT **does not** transport or handle 'specialist goods' such as 'waste' or 'dangerous goods' and occasionally transports 'abnormal loads. More specifically, CHT **does not** transport dangerous goods within the scope of the ADR regulations, but some 'specialist' products may from time to time be stored and transported which fall under the definition of '**limited quantity**' and within the acceptable 'small load' threshold.

If / when occasionally a 'specialist' product is stored and transported by CHT, this will be carried out by trained CHT staff acting in accordance with the SSoW, a copy of which is in this section of the manual.

All relevant safeguards will have been put in place prior to storing such goods, as required, and stipulated within the guidance of the bespoke product safety data sheet ("SDS").

Printed copies of the product 'SDS' are filed at the storage premises and made available for management and staff reference. The product 'SDS' themselves are individually recorded on a bespoke Company database. A sample copy of an 'specialist goods' related product 'SDS' is located within this section of the manual.

#### **Abnormal Loads**

An 'abnormal load' is one that is indivisible and on account of its length, width, height or weight be carried on a normal vehicle. CHT deliveries made on behalf of our customer 'Donaldson Timber Systems' deliveries are an example of an 'AlL' delivery.

'AIL' deliveries are subject to a Risk Assessment and SSoW, and the loading and delivery procedures are further referenced in the Company's 'Prescribed and Designated Routes Policy' & 'Load Safety Policy', copies of which are filed in this section. SSoW requires the fitting of Marker boards to a 'AIL' load prior to delivery.

Where abnormal loads are to be transported, the CHT driver MUST adhere to the SSoW which directs the driver to follow the 'Esdal2' electronic service delivery notification, which sets out the specifics of the load including the specific route/directions to the delivery point which MUST be strictly adhered to by the driver.

### 'Responsibility for Managing Specialist Operations'

Whilst CHT does not engage in 'specialist operations, CHT has appointed the FTA Consultancy Services to provide it with all necessary consultancy assistance, support and advice just in case it is ever needed.

Further, to comply with the requirements of the FORS Standard, and just in case it is needed, the 'Traffic Office' team is named on the Company's organisation chart as having the responsibility for managing its 'Specialist Operations', a copy of this organisation chart is in section 'M4 – Staff Resources' of the manual.

A copy of the FTA's 'Dangerous Goods Safety Advisor Consultancy Services' current certificate is located within this section of the manual.

### Other Waste Streams

Under the wider definition and interpretation of 'waste', CHT does generate 'waste' as a normal consequence of its Workshop operations 'North' and 'South' (such as used tyres, engine oils and fluids etc.), and is a receiver of 'waste' because of delivering new carpet tiles on behalf of its customers and being asked to collect used ones for safe storage at CHT premises and eventual controlled disposal.

For Workshop 'day to day' operations, CHT has appointed specialist service providers to provide a collection and safe disposal service for its waste tyres / oils / fluids / filters. Where such collections take place, consignment notes are kept on file (normally at the location) recording full details of each transaction sample copies of which are included in this section of the manual.

On behalf of its own customers, where CHT are required to transport 'waste' (as in the case of collecting used carpet tiles), the Company ensures that it complies with the duty of care requirements in respect of 'Waste Transfer Notes' (WTN') and the safe disposal, keeping and transferring of waste.

CHT has in place several customers bespoke WTNs which are purposely designed for 'multiple consignments' for the same customer at the same collecting address. These WTNs are valid for 12 months and are diarised to be renewed in advance of their expiry to ensure a continuance of cover samples copy of WTNs are included in this section of the manual.

CHT has in place all relevant permissions and licences, including more specifically:

- Registration of Carrier CBDU167063 [CHT ref. L003]
- Hazardous Waste Registration Bromag AGQ805, Skem NAY753 [CHT ref. L002]
- Registration of Exempt Waste Operations [CHT ref. L022 and L024]

### **O6 – Operational Security**

### **Policies**

CHT has put in place the required resources, policies and supporting procedures to protect the fleet operation against criminal and unauthorised activity minimising loss, damage, and risk.

Set out in Section 4 of the 'Drivers Handbook' under subject headers 'Safeguarding Clients Property & Goods', 'Vehicle / Equipment Theft & Unauthorised Access' and 'Vehicle Loading & Security', CHT drivers are instructed on the importance of maintaining operational awareness, security and vigilance whilst undertaking their duties.

The 'Drivers Handbook' includes a copy of the 'General Hazards & Risks Relating to Drivers and their Vehicles - RA056GEN', which includes specific reference to risks associated with 'Lone Working' and 'Operational Security & Counter Terrorism'.

More specifically:

CHT's 'Operational Security and Counter Terrorism' policy raises driver awareness of the risks associated with commercial vehicle crime including terrorist attack. The policy sets out how drivers can take simple measures to minimise these risks to ensure their safety and wellbeing whilst driving. A copy of this policy and supporting risk assessment 'RA084GEN' is in this section of the manual.

These policy principles are further reinforced via a 'Toolbox Talk' on 'Security of Vehicles and Driver Safety', a subject which features in CHT driver refresher training and is regularly displayed on information screens. A Copy of the 'Toolbox Talk' 'Security of Vehicles and Driver Safety' is contained within this section of the manual.

In 2019, 'Lorry Crime Prevention' guidance issued by the UK Border Agency also featured in the driver CPC training modules completed inhouse by all CHT drivers.

### Customer Access Checks / Load security

CHT conduct 'Access Checks' at all new customer delivery points in accordance with written guidelines. This onsite access check is a comprehensive assessment of key issues such as: good and unimpeded vehicle access to site; safe loading and unloading arrangements whilst onsite; and consideration given to the security of the vehicle, its load, and the driver personal security. A copy of the 'Access Check' process is in this section of the manual.

In practice, most customer deliveries undertaken by CHT take place directly to **secure commercial premises**, normally within designated Industrial Estates where access to the site is restricted and controlled (entrance gate/barrier systems), and access is often only possible by a pre-booking arrangement.

Where certain customer deliveries specifically require that a vehicle load arrives at a customer site in a 'sealed' condition, this will be achieved using cable ties.

When the entire load needs to be secured, this will be done using unique seals, and the number is cross referenced to CHT paperwork, a copy of which is included in this section of the manual.

### Vehicle keys

Drivers are required to remove their vehicle keys during the process of loading and unloading of their vehicles, and when they leave their vehicle.

The requirement for drivers to remove vehicle keys is set out in Company risk assessments, including more specifically: 'Ops Security & Counter Terrorism – RA084GEN' and 'Loading / Unloading of a Curtain Sided Vehicle - RA044GEN'.

When CHT vehicles are parked up and not in use, vehicle keys are to be removed and the vehicle itself left secure.

A spare vehicle key is held for each CHT vehicle, which is kept locked / secure in a key safe cabinet located within the confines of the 'Traffic Office', and only accessible by the on-shift Traffic Office Duty Manager.

#### **O7 – Counter Terrorism**

[See also O6 – Operational Security]

#### **Policies**

CHT fully recognises the importance of the ongoing terrorist threat and has put in place the required resources, policies and supporting procedures to raise staff awareness of this threat and the importance placed by the Company of staff maintaining security and remaining vigilant across all aspects of the organisation's activities.

More specifically, CHT's:

'Operational Security and Counter Terrorism' policy raises driver awareness of the risks associated with commercial vehicle crime including terrorist attack. The policy sets out how drivers can take simple measures to minimise these risks to ensure their safety and wellbeing whilst driving.

The policy requires that all CHT drivers complete the **FORS eLearning** module on 'Security & Counter Terrorism' <u>both</u> initially on \*induction and thereafter every 2-years to remind drivers of new and existing security measures.

\*All newly inducted drivers must complete the FORS eLearning module on 'Security & Counter Terrorism', together with a FORS 'safety related' eLearning module.

'Mail Screening Policy' raises CHT staff awareness to the terrorist or criminal threat arising from delivered items (including letters, parcels and anything delivered to the Company by post or courier). This policy sets out the procedures to be followed by CHT staff in the event of a suspicious item being delivered to and received by the Company.

**'Bomb Threat' Policy** raises Operational (all Managers and Employees) awareness to the current and continuing terrorist threat which could arise from many sources including (but not limited to), receiving threatening telephone calls, incendiary devices and letter bombs, and such like. This policy sets out the procedures to be followed by CHT staff in the event of a terrorist threat being received or if a threat is suspected.

'Disaster Recovery & Business Continuity Plan' defines a 'disaster' as any event (e.g., fire, explosion, serious flood, spillage/escape of hazardous substances) which requires evacuation of one or more buildings and the attendance of the Emergency Services. A 'disaster' therefore is one where there is substantial disruption to normal business in its aftermath, requiring mobilisation of significant internal and external resources.

The plan sets out how the critical functions of the Company can be re-instated as soon as possible ensuring an unbroken level of front-line services, whilst full restoration is planned for and implemented.

## 'Counter Terrorism Champion'

Nick Risk is the named 'Counter Terrorism Champion' on the Company's organisation chart, a copy of which is in 'M4 – Staff Resources'.

Nick is also named as the internal reporting 'contact' person in the Company's 'Operational Security & Counter T.