Grey Fleet Safety Management Guide
A comprehensive Grey Fleet Safety Guide such as this could not have been produced without the consultation and assistance of numerous dedicated and safety passionate people working within a wide variety of industry settings. Production of this “guide” involved countless hours of work and the people involved made themselves constantly available and contributed freely their time to ensure that this final document is particularly relevant and practical to industry. The collective wealth of experience of the people involved is quite considerable and while some may have devoted considerable time others may have contributed just as immensely by conveying an idea or sharing a simple statement.

The authors of this guide and the NRSPP would like to acknowledge and thank all those involved in the development and production of the Grey Fleet Safety Guide. Ideally, we would like to list all the names and organisations acknowledging their important contribution to this document, however to do so was viewed as potentially compromising the anonymity and confidentiality of those involved, particularly as information associated with case studies could be potentially compromising.

So to all those involved and you know who you are, THANK YOU.
This guide is to be treated as a live document as it will be updated annually as lessons from the coalface come in about managing Grey Fleet safety.

Definitions

- **Grey Fleet**: any vehicle used for work not directly provided by the organisation that employs the driver. In this guide, Grey Fleet includes personal vehicles, all forms of leases and client vehicles. Grey Fleet applies whether workers are reimbursed for expenses associated with work use or not, such as kilometres travelled.
- **Grey Fleet Non-Vehicle**: another mode of transportation owned by the employee that is used for work purposes, such as a bicycle.
- **Grey Fleet Driver**: employee of the organisation who is operating a personal vehicle for work purposes.
- **Traditional Fleet**: also known as ‘normal fleet’, the fleet of vehicles owned and operated by the organisation.
- **Worker**: any person who carries out work in any capacity for a person conducting a business, including employees, contractors, volunteers, outworkers and students undertaking work experience (Work Health and Safety Act 2011)
- **Workplace**: a place where work is carried out for a business or undertaking and includes any place where a worker does or is likely to be while at work, including vehicles, vessels, aircraft and other mobile structures (Work Health and Safety Act 2011)
Table of Contents

1. Identifying Grey Fleet 8
   1.1. Managing Grey Fleet vs traditional fleet 8
   1.2. When should Grey Fleet use be considered? 11
   1.3. Core Grey Fleet management considerations 13
   1.4. Legislation 16
   1.5. Grey Fleet variations in vehicles and usage 19

2. How do I manage the Grey Fleet Risk? 21
   2.1. What are the responsibilities in managing Grey Fleet safety? 21
   2.2. Who are the stakeholders? 21

3. Core safety elements 23
   3.1. Risk management approach 23
   3.2. How can an organisation help? 24
   3.3. Vehicle safety 25
   3.4. The driver’s responsibilities in vehicle safety 29
   3.5. Journey management, worker mobility and tasks 33

4. What does progress in Grey Fleet safety management look like? 36

5. Guide to developing and implementing a Grey Fleet policy 39
   5.1. Where are the problems and what are the issues? 40
   5.2. Establishing systems for Grey Fleet management 40
   5.3. Involvement and alignment of key stakeholders 42
   5.4. Developing internal processes to manage Grey Fleet risks 44
   5.5. Consider resources 46
   5.6. Overcoming barriers 46
   5.7. Staff education and training 47
   5.8. Ongoing communication and consultation 47

6. Review monitoring and continuous improvement 48

7. Appendices 49
   7.1. Appendix 1 – Legislation and industry codes 49
   7.2. Appendix 2 – Risk management approach detailed explanation 53
   7.3. Appendix 3 – Grey Fleet risk matrices 57
   7.4. Appendix 4 – Pre-start checklists 62
   7.5. Appendix 5 – Policy Template 64
   7.6. Appendix 6 - Grey Fleet Driver Declaration 69
   7.7. Appendix 7 - References 70
Overview

With road crashes representing the most common form of work related fatality, driving for work purposes is a considerable road safety risk. Work crashes also incur a greater average lost time in worker absence compared to other workplace claims and vehicle crashes account for approximately 39% (average from 2003-2015 in Australia) of all worker fatalities.

One area of work driving that is problematic and often neglected in regards to risk and safety management is Grey Fleet. Grey Fleet is the proportion of work vehicles used for work purposes owned by the driver or another entity rather than being directly provided by the organisation employing that driver.

Although Australian legislation outlines obligations and responsibilities associated with the safe use of a vehicle used for work, Grey Fleet presents a range of challenges for organisational fleet management, particularly in enforcing or adhering to organisational safety policies, procedures and legislation by workers or contractors operating Grey Fleet. Organisations may also experience slightly different Grey Fleet safety management issues depending on the type of organisation and activities associated with business operations. For example, there can be subtle differences in driver management in the not-for-profit and volunteer sector versus the building and construction sector. Consequently, organisations need to develop a suitable framework and guide to safely manage their Grey Fleet.

How to use this document

This Grey Fleet guide aims to provide organisations with such a framework by highlighting some of the key issues and providing risk management strategies and considerations to adopt a safer Grey Fleet. It was generated by the National Road Safety Partnership Program (NRSPP) Grey Fleet Working Group to provide organisations with a method for managing their Grey Fleet. It is not designed to be an exhaustive document providing answers to every issue. Rather, it aims to provide a framework that allows organisations to work through issues associated with their own Grey Fleet and organisational operations to manage risk and improve work driving safety.

The document is structured around six main sections designed to help those responsible for workplace safety work through the Grey Fleet framework (Figure 1). Each section and sub-section in the document is accompanied by an action or series of questions to be considered by an organisation. These questions and actions help formulate an understanding of an organisation's Grey Fleet and a subsequent management plan.

Section 1 presents Grey Fleet within an organisational context, helping organisational representatives determine if the organisation needs to consider Grey Fleet within its operational and risk management context.

Section 2 focuses on managing Grey Fleet risk, outlining responsibility for Grey Fleet safety and identifying potential stakeholders in an organisation's Grey Fleet safety management and processes.
Section 3 examines the key safety elements to consider in a Grey Fleet policy and how to manage them. Discussing such factors as risk identification and assessment, risk mitigation and treatment, and roles and responsibilities as well as vehicle safety, journey management and worker mobility and tasks.

Section 4 shows that understanding an organisation’s safety maturity helps identify gaps in its Grey Fleet safety management and knowledge. This can then inform creation, implementation and evaluation of risk management improvements in Grey Fleet safety management over time, giving an organisation confidence that Grey Fleet safety risks are appropriately mitigated.

Section 5 outlines a structured approach for organisations planning and implementing a Grey Fleet safety management strategy, allowing for adapting a tailored approach specific to the needs and circumstances of each organisation.

Developing, implementing and evaluating a Grey Fleet safety management policy is a continuous process, so Section 6 focuses on enabling organisations to continuously evolve and improve Grey Fleet safety. As well as helping address issues not previously considered, constant monitoring and evaluation allows an organisation to incorporate improvements in technology to manage safety better.

Figure 1: The overall flow of this document
1. **Identifying Grey Fleet**

This section begins exploring and defining whether a *Grey Fleet* exists within an organisation and, if so, what processes may be required to manage safety accordingly. This section helps define *Grey Fleet*, a key initial step in determining the scope of an organisation’s *Grey Fleet* and any associated safety risks.

Various legislation across multiple jurisdictions clearly outline legal obligations and responsibilities associated with safe use of a vehicle for work related activities. These obligations (see Appendix 2 – Legislation and industry codes for a brief overview) apply regardless of whether the vehicle used for work purposes is provided by an organisation or is privately owned. Work related driving, and in particular the use of *Grey Fleet* for work driving, could be considered a high-risk work activity and, in addition to legal obligations, there are numerous challenges facing organisations to successfully manage *Grey Fleet* risk.

---

**Case Study: Highlighting common management oversight**

Organisation X has just sold off its fleet vehicles and has no policy concerning alternative forms of travel, such as ride sharing and public transport, outside of the traditional fleet. Recognising the risk, a key member of the safety team questions the CEO on what *Grey Fleet* policies are in place to manage use of private vehicles now the fleet is gone.

The CEO responds by asking: “What is *Grey Fleet*? Why does it matter? Why does it concern me? Moreover, shouldn’t this *Grey Fleet* element be the employee’s responsibility not mine?”

When the employee explains that employees using a personal vehicle for work purposes means they are driving within the organisation’s *Grey Fleet*, and that providing a safe workplace extends to an employee driving their own vehicle for work purposes, the CEO is surprised. The employee outlines that it is no different to when electronics of any kind, such as a heater or radio, are brought into the office: they must first be tested, tagged and passed before being used in the workplace.

Once he recognises the risk, the CEO says the organisation needs to implement guidelines for safely managing its *Grey Fleet*.

This Case Study is a simple example of how organisations may not be aware they have a *Grey Fleet* risk to manage.

---

1.1. **Managing Grey Fleet vs traditional fleet**

Minimal changes are usually required to existing fleet safety management processes to incorporate *Grey Fleet*. Often changes will simply require specific additions for risks specifically associated with *Grey Fleet*. A sound risk management approach will mitigate *Grey Fleet* safety risk and may also result in cost savings.

Managing the safety risks associated with *Grey Fleet* is pivotal for any organisation, however a crucial first step is creating a thorough understanding of the roles and responsibilities that apply to use of private vehicles for work purposes.
Effectively managing these vehicles requires specific safety policies and procedures to mitigate or manage all safety risks. To ensure the utmost safety of all *Grey Fleet* drivers, safety management practices must go beyond a simple ‘tick the box’ exercise.

Effective *Grey Fleet* safety management encompasses the same principles as effective traditional fleet safety management, such as risk management, and ensuring safety and that all vehicles are fit for purpose and adequately serviced and maintained.

However, in a traditional fleet there are often core maintenance and servicing activities and responsibilities undertaken in a fleet department to ensure vehicles are well maintained, safe, reliable and roadworthy. While maintenance and vehicle safety is also required in *Grey Fleet*, servicing and maintenance is not undertaken specifically by the organisation's fleet department. Consequently, ensuring servicing and maintenance of *Grey Fleet* vehicles may require other evidence that this activity is being completed in accordance with vehicle safety requirements. Organisations need to implement processes and procedures to better risk manage some of the specific challenges associated with *Grey Fleet* safety, as outlined in Figure 2.

### Action: Ask yourself...

- Does your management consider *Grey Fleet* as a workplace?
- What vehicle types and worker types do you think are included in your organisation's *Grey Fleet*?
- Do they differ from the ones mentioned above? Can you think of any more?
- Take note of each of these, and whether you think they are being managed effectively.
- How would your organisation react to a worker using a motorcycle regularly for work related duties?
**Case study: Grey Fleet driving exposure**

The Grey Fleet exposure of this organisation encompasses about 30% of the organisation (70% of the organisation’s operational staff are provided with company fleet vehicles). To determine the vehicle kilometres being driven within this organisation’s Grey Fleet, it undertook a survey of exposure using data gathered by the Human Resources (HR) Department. At this organisation, HR collects data on kilometres and hours travelled by employees in their private vehicles through claims for reimbursement of kilometres travelled.

Although this process only captures members of the organisation driving within the Grey Fleet that are claiming reimbursements, the survey showed that more than 1,000,000 vehicle kilometres were being claimed annually within its Grey Fleet. This survey also determined that, of the claimed kilometres, 70% were from apprentices. This is because apprentices must provide their own transport to and from the worksite and claim reimbursement for the kilometres travelled.
1.2. *When should Grey Fleet use be considered?*

When work related travel is required, various options relating to the mode and means of transport should be considered, particularly in regards to managing risk. Depending on the journey required, *Grey Fleet* might not be the safest option. *Table 1* highlights various travel and journey options to mitigate risk and ensure safety, including considering options available that may enable work to be undertaken without any travel. If travel is required, *Table 1* shows various modes of transport in combination with key questions to assist in development of a *Grey Fleet* risk matrix. This information is designed to encourage organisations to consider their own journey management and transport options. While this guide aims to address the majority of operational circumstances, not all safety risks are identified and included.
Table 1: Decision matrix for work related travel - mobility options to be considered before Grey Fleet

<table>
<thead>
<tr>
<th>Decision making</th>
<th>Travel option</th>
<th>Questions to ask yourself</th>
</tr>
</thead>
</table>
| Step 1          | No Transport                           | • Can the meeting be completed without travel?  
• Can the journey be avoided through technological contact facilities?  
• Not all meetings have to be face-to-face; Skype or similar reduces exposure and costs.                                                                                                             |
| Step 2          | Public Transport                       | • Can the journey be carried out using public transport?  
• Does the organisation provide systems and approaches that enable use of public transport?  
• What can an organisation do to help support the use of public transport alternatives? An example to consider may be an organisational public transport card workers can book, just like a fleet vehicle.  
• If specific tools are required for the task, how will these tools be transported, e.g. the use of public transport for short trips may be a viable solution. |
|                 | Shared Transport                        | • Ride sharing/car share industry/taxi.  
• If public transport is not an option for the journey, could ride sharing be used? This avoids a company worker getting behind the wheel.  
• If specific tools are required for this task, how will they be stored in the vehicle?                                                                                                                   |
| Step 3          | Fleet/Pool Vehicle                     | • Do you have an operational vehicle available for this journey?  
• When choosing a vehicle to have in the fleet or pool, can you guarantee these are fit-for-purpose and maximised in ANCAP safety standards, and that the driver understands how to operate the vehicle?  
• Does your employee have the appropriate licence, which is current for the vehicle?  
• Have you considered the employee may not be used to driving this type of vehicle?  
• Do you provide training or guidance for the operational safe use of the vehicle?  
• If specific tools are required for this task, how will they be stored in the vehicle?                                                                                                 |
| Step 4          | Hire Vehicle or Long-term Lease Vehicle | • Do you have a hire (short-term lease) or long-term lease vehicle available for this journey?  
• When choosing to use a lease vehicle, can you guarantee these are fit-for-purpose and maximised in ANCAP safety standards, and that the driver understands how to operate the vehicle?  
• Does your employee have the appropriate licence, which is current for the vehicle?  
• Have you considered the employee may not be used to driving this type of vehicle?  
• Do you provide training or guidance for the operational safe use of the vehicle?  
• If specific tools are required for this task, how will they be stored in the vehicle?                                                                                                 |
| Step 5          | Grey Fleet Vehicle                     | • Has the organisation considered what entails a safe personal/private vehicle for business purposes?  
• Is the vehicle appropriately maintained and insured?  
• If specific tools are required for this task, how will they be stored in the vehicle?                                                                                                                   |
|                 | Car-Pooling a Grey Fleet Vehicle       | • In addition to the above questions consider:  
• Could two co-workers share the vehicle?  
• In this case, consider whether one worker will be the passenger (what is the role of the passenger?) or whether the two workers would share the driving.  
• If specific tools are required for this task, how will they be stored in the vehicle?                                                                                                                   |
| Step 6          | Grey Fleet Non-Vehicle                 | • Is it acceptable for the organisation's workers to use bicycles or motorcycles/powered two wheelers for work related transport?  
• If the organisation has no policy saying otherwise….                                                                                                                                             |
| Step 7          | Grey Fleet Driver (Double Grey Fleet)  | • A Grey Fleet driver is when a worker may drive a client's or friend's vehicle.  
• Has the organisation considered what entails a safe personal/private vehicle for business purposes?  
• Is the vehicle appropriately maintained and insured?  
• Does the driver have the appropriate type of licence for the vehicle they are using?  
• Has the organisation considered what entails a safe personal/private vehicle for business purposes?  
• If specific tools are required for this task, how will they be stored in the vehicle?                                                                                                           |
Case study: Flexibility and scope in defining Grey Fleet vehicle

Some broad Grey Fleet guidelines exist within this organisation, including that light vehicle passenger cars are preferable to motorcycles due to superior safety. However, due to the size and complexity of the organisation’s business units, guidelines are adjusted for the situation. For example, where motorcycle use is common, exceptions may be made. The new policy developed will be a risk based approach rather than having strict rules.

What constitutes an appropriate Grey Fleet vehicle depends on how often it is going to be driven. For example, if someone is regularly driving their personal vehicle, the organisation prefers them to have a vehicle no older than five years, with a certain level of safety features. For infrequent use of personal vehicles, the organisation will base the expectation of vehicle condition on a conversation about how the trip is to be undertaken. This means the organisation is assessing each case on a person-to-person basis, and basing its decisions on the risk level identified. This organisation believes that enforcing strict rules is ineffective because people may not abide by these rules, and much of the Grey Fleet mileage may go unreported.

1.3. Core Grey Fleet management considerations

The ‘out of sight, out of mind’ nature of Grey Fleet operations presents specific safety management challenges. Grey Fleet safety risk management can remain inadequately addressed simply due to the inherent nature of vehicles being used, that is, they are not under the direct daily management and ownership of an organisation.

Grey Fleet monitoring data is difficult to capture, as vehicles are primarily privately owned; traditional fleet vehicle monitoring does not have these difficulties. Ensuring Grey Fleet vehicles are regularly serviced, maintained and roadworthy can be difficult, resulting in increased risks to safety (discussed in section 3.3). Table 2 provides an outline of the core considerations for Grey Fleet management.
<table>
<thead>
<tr>
<th>Consideration</th>
<th>Why?</th>
<th>Questions to ask about controls</th>
<th>Read more</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>The Organisation</strong></td>
<td>The organisation needs to include a code of conduct for its Grey Fleet. If this code of conduct is included within all positions, it can be utilised for reporting and KPI assessments.</td>
<td>Do you have a code of conduct in place for Grey Fleet? Is driving within the core responsibilities outlined for employees? Is performance of employees’ driving skills measured? Is there training and guidance on the organisation’s driving expectations and use of vehicles? Do you use a near miss reporting system? Should a crash occur involving a Grey Fleet driver, does your organisation have the necessary systems to protect reputational damage and allocation of costs?</td>
<td>Read more</td>
</tr>
<tr>
<td><strong>The Driver</strong></td>
<td>The state and competency of a driver can affect their ability to operate a vehicle. Assessment of risk factors should be considered during recruitment where driving is a core requirement of the role.</td>
<td>Is driving considered part of your organisation’s recruitment process and job performance? Is driving part of a worker’s job and is this included in the job description with safety KPIs to measure performance? Do you have a fatigue management checklist? Are you aware of the driver’s condition before they begin their journey? Do you have a policy around the condition a driver needs to be in before undertaking a work related journey? Does this policy go beyond basic road rules so the organisation has higher standards than those for the public? Is your approach to managing drivers part of a broader systems based approach or driver centric? Are your drivers properly educated in safe driving?</td>
<td>Read more</td>
</tr>
<tr>
<td><strong>Licence</strong></td>
<td>Ensuring workers have valid driver’s licences that are appropriate for the type of vehicle being driven for business use should be a key consideration for a Grey Fleet manager.</td>
<td>Do you know whether your workers have a valid licence while operating your Grey Fleet? See your state’s legislation on licencing and insurance for the workplace. See Action Box below.</td>
<td>Read more</td>
</tr>
<tr>
<td><strong>Insurance</strong></td>
<td>Checking workers have the appropriate vehicle insurance for business use is a key consideration for a Grey Fleet manager (See case study below).</td>
<td>What is the organisation doing to ensure the Grey Fleet vehicle is properly insured? What are the expectations and controls around insurance? Is it being checked and audited to demonstrate they are insured? See Section 3.4.3 on Insurance.</td>
<td>Read more</td>
</tr>
<tr>
<td><strong>The Environment</strong></td>
<td>The environment in which the driver is travelling is a pivotal component of how safe the journey is: • the physical road the driver is driving on (i.e. urban roads, rural roads, unsealed roads), and • weather conditions in which the journey is undertaken.</td>
<td>Do employees have proper training for driving in adverse conditions? Is the Grey Fleet vehicle suitable for the conditions/road type being travelled on? Is the driver accustomed to the driving demands being asked of them? See Section 3.3 Vehicle Safety and Table 1 on modes of transport Refer to NRSPP’s Policy Paper: Guide To The Development Of A Safe Vehicle Purchasing Policy at this stage for purchasing vehicles.</td>
<td>Read more</td>
</tr>
<tr>
<td><strong>The Vehicle</strong></td>
<td>The suitability of the vehicle for the job, roadworthiness of the vehicle, and the registration of the vehicle are all considerations that need to be taken into account before a vehicle is used for the purposes of Grey Fleet.</td>
<td>Does the organisation have an age stipulation for its vehicles? Are the types of vehicles being used specific to the task? Are the vehicles fit for purpose, including goods carried? Do you have policies around the use of mobile phone cradles, etc.? What type of Grey Fleet is there within the organisation?</td>
<td>Read more</td>
</tr>
<tr>
<td><strong>The Journey</strong></td>
<td>While a worker is undertaking a task for an organisation, their safety is that organisation’s responsibility. Understanding your workers’ travel patterns and assessing the need to travel are crucial to Grey Fleet management. Any travel policies should include Grey Fleet workers to ensure their journeys are being managed effectively.</td>
<td>Are you aware how your workers are getting around? Do you know the total distance your workers are travelling each year? Do you consider risk variances of total distance travelled by a worker for personal and work purposes, i.e. low vs. high mileage? Do you have journey management plans in place? If so, do they include your Grey Fleet? Is the journey management plan checked, enforced and signed off before each journey? See Section 3.5 Journey Management, Worker Mobility and Tasks</td>
<td>Read more</td>
</tr>
</tbody>
</table>
Hypothetical case study:
No insurance considerations in Grey Fleet can affect employers

While driving for work related purposes, a driver has a crash causing significant damage to their personal vehicle. Their employer is unaware of its Grey Fleet obligations so the worker only has personal insurance for their vehicle; they were unaware they should have work related travel insurance. The driver frequently uses their personal vehicle for work related purposes.

The crash causes significant injury to a third party plus damage to their vehicle. The Grey Fleet driver is identified as being at fault and admits to their personal insurer they were driving for work related purposes, and do it regularly. Their insurer voids the worker’s insurance coverage because the crash is work related; the insurer for the impacted third party now has to find someone to pay their customer’s significant costs.

Since the worker’s insurance is void and effectively has no insurance, the third party’s insurer goes directly after the organisation of the worker (who caused the crash) because it had no systems to ensure its worker was operating in a safe workplace. The organisation must pay for the damage and medical expenses of the third party as well as accepting public and media scrutiny for the incident.

Action: Ask yourself...

- What other risks, hazards or considerations can you identify with your Grey Fleet operations?
- What actions are you taking to mitigate those risks?
- Once the risk have been identified, what have you done about them?
- Other risks may include:
  - Are there children in the vehicle?
  - Are there clients in the vehicle?
  - Do you have special needs passengers?
1.4. **Legislation**

It may be difficult to define what activities are work related within a journey. Check legislation in the state/s you operate in as states have different legislation when it comes to Grey Fleet. For example, in Queensland a journey travelling to and from work is viewed as a work journey; other states don’t include commuting to and from work as a work journey.

There is a broad range of legislation and codes that can apply to Grey Fleet. Appendix 2 – Legislation and industry codes provides a more detailed overview and examples of standards and case law that may apply to Grey Fleet. Other areas of consideration include things like tax law.

1.4.1. **What are my legal responsibilities?**

Various legislation pertain to the safety of workers when operating a vehicle as part of a business (these are summarised in Appendix 2 – Legislation and industry codes). At the Federal level, this includes:

- the Safety Rehabilitation and Compensation Act 1988
- the Work Health and Safety Act 2011, and
- the Work Health and Safety Regulation 2011.

Under the Work Health and Safety Act 2011, organisations must provide a safe working environment. The Act states a workplace is any place where work is carried out for a business or undertaking and includes any place where a worker goes or is likely to be while at work, including vehicles and other mobile structures. Vehicles are seen as a workplace when workers are operating within an organisation’s Grey Fleet.

For further information on the legal implications of Grey Fleet for businesses, see the NRSPP’s Grey Fleet: Legal Implications for Businesses. A summary of this document is provided below:

- The term ‘Grey Fleet’ is not specifically included in any Australian legislation or case law.
- Legal liability imposed on employers for use of these Grey Fleet vehicles will be dependent on jurisdiction, legal context and the wording of specific legislative provisions, and may differ across jurisdictions and contexts.
- Legislative regimes are often not consistent across all Australian states and territories, and limited case law exists
- For work health & safety purposes, workplace includes a vehicle used by a worker for work purposes
- Employers have legislative duties to ensure, so far as is reasonably practicable, the health and safety of their workers and other persons
- At common law, employers must also take reasonable care not to cause harm to those persons to whom they owe a duty
- What is reasonably practicable and/or what amounts in law to taking reasonable care will depend on the individual circumstances of each case and is determined retrospectively by a court.
- The legislative definitions of ‘reasonably practicable’ and ‘reasonable precautions’ can provide a general guide for prospectively assessing the risks of harm associated with using Grey Fleet vehicles.
This document also provides four case study examples of the legal implications of Grey Fleet. Two examples are below:

• An executive is provided a car allowance within their salary package and uses a private vehicle to travel to client meetings or between multiple company locations.

• A small charity relies on volunteers to deliver food parcels. One of its [elderly] volunteers uses their own car, [which does not have airbags or ABS]. The organisation has no record of the vehicle of its safety status [or of the current licence status of the volunteer]. The volunteer is killed in a road accident on the way to a work appointment.

1.4.2. Obligations and Duty of Care

The fact workers use their own private vehicles for business undertakings does not absolve the organisation from duty of care responsibilities. An organisation’s duty of care obligations in regards to Grey Fleet drivers and operations could include (but are not limited to):

• ensuring Grey Fleet drivers drive safely and within legislative requirements

• checking a Grey Fleet driver has a valid driver’s licence that is appropriate for the vehicle being driven

• checking a Grey Fleet driver has the correct motor insurance for business travel, and

• ensuring the Grey Fleet vehicle is in a safe and adequately maintained (i.e. roadworthy) condition with regular servicing.

Additional duty of care responsibilities could include:

• providing sound, impartial and sensible advice to Grey Fleet drivers about their safe driving obligations

• having clear and concise company policies and procedures to ensure Grey Fleet drivers know what is expected of them

• undertake Grey Fleet driving risk assessments, which include simple checks and preventative measures to ensure drivers are safe and compliant, and

• provide education and training to Grey Fleet drivers so they understand the risks and are capable of mitigating them to reduce accidents and offences.

Organisations may also have a responsibility to ensure they keep thorough records to demonstrate appropriate policies and procedures have been developed and implemented. Further evidence should also be available, acknowledging risks are well managed and risk mitigation strategies have been successfully implemented.

Action: Ask yourself...

• Am I aware that I have various legal responsibilities to manage risk and ensure Grey Fleet safety?
• What is the relevant legislation that applies to my organisation and me?
• Have I considered whether my state’s legislation differs from other states?
• Have I ensured this legislation is included in my Grey Fleet management plan?
1.4.3. **Is Grey Fleet included in your contracts and worker certification?**

When an organisation commits to a contract with government or a large organisation, a set of terms are often agreed on. These terms may vary significantly depending on the contracting organisation’s approach to risk management, safety and brand protection. Organisations need to be aware that their responsibilities for ensuring a *Grey Fleet* driver’s eligibility, legality and competence are identical to the standards expected if the driver was driving a company vehicle. Driver eligibility and competence can be established and monitored by undertaking a thorough driver certification process and the use of audits.

1.4.4. **Have you conducted a Grey Fleet audit?**

Measuring the existence of a *Grey Fleet* within an organisation is a crucial first step towards effective *Grey Fleet* management. An auditing process helps ensure organisations are meeting duty of care responsibilities.

The first step in an audit could be to benchmark your *Grey Fleet* against others in the industry. An organisation can then conduct comparisons to ensure all *Grey Fleet* drivers are operating safely.

It is an organisation’s duty to ensure, through a robust auditing process, that all workers are correctly licensed, have an appropriate level of insurance cover, and have an appropriately registered and roadworthy vehicle to be driving as part of *Grey Fleet*.

A pre-start safety check, undertaken prior to use, can help to ensure a vehicle is safe to use. A pre-start check can be undertaken at whatever time intervals are listed in your *Grey Fleet* management plan. This could be before every drive, weekly, monthly, or at random. A basic but reasonable pre-start checklist would include:

- Good tyre condition and correct tyre pressure (based on user manual)
- All lights (headlights, brake lights, reversing lights and indicators) are working
- Windscreen wipers and washers working
- Appropriate fluid levels (oil, coolant, etc.)
- Windscreen and windows are free of cracks, damage and dirt.

A full pre-start checklist to be done daily and submitted weekly has been included in Appendix 5 – Pre-start checklists. By submitting this checklist weekly, the driver has to indicate that they undertook a daily check but that they also undertook a more detailed weekly check.

**Action: Ask yourself...**

- What available evidence is on record to ensure *Grey Fleet* duty of care obligations are being met?
- Does the organisation have clear processes regarding record keeping of *Grey Fleet* safety operations?
- Does the organisation have a *Grey Fleet* safety policy?
- Is this policy clear, concise, available and promoted?
- Is there evidence that the organisation is educating drivers about *Grey Fleet* risk and risk mitigation procedures?
- What evidence is available to ensure all *Grey Fleet* vehicles are well maintained and safe?
1.5. Grey Fleet variations in vehicles and usage

Grey Fleet varies significantly between industries, within sectors and even within large organisations. The trend, indicated by NRSPP Partners, is organisations are increasingly moving towards growing their Grey Fleet as their primary mobility solution. More proactive companies are moving towards a Grey Fleet to reduce their reported fleet size and GHG emissions; if a vehicle is not owned nor documented by the company, neither are its emissions. Some private sector organisations often provide an allowance or mileage compensation for workers to use their own vehicles for work related purposes. However, some organisations are simply unaware of the existence of a Grey Fleet within the organisation, let alone the responsibility associated with managing it.

Table 3 outlines the variations in Grey Fleet across three key industry sectors that use Grey Fleet as a major mode of transport. It should be noted that specific examples of these industry categories have been used although there may be variations.
<table>
<thead>
<tr>
<th>Questions</th>
<th>Sector 1 – Utility</th>
<th>Sector 2 – Not for Profit (NFP)</th>
<th>Sector 3 – Business</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Vehicle Type</strong></td>
<td>Varying, as travel requirement is only to and from site. If equipment is required to be transported, a company vehicle will be offered. Generally, personal vehicles are light commercial vehicles such as utes.</td>
<td>NFP fleet vehicles are predominately passenger vehicles, with a smaller percentage of commercial vehicles. The <em>Grey Fleet</em> varies considerably, but is also predominately passenger vehicles.</td>
<td>Predominantly passenger vehicles.</td>
</tr>
<tr>
<td><strong>Method of Reimbursement (if applicable)</strong></td>
<td>A time sheet is generally filled out with kilometres travelled and these are reimbursed.</td>
<td>Reimbursement of cents per kilometre; employees fill in a time sheet and make a claim. Alternatively, many claim on their tax return.</td>
<td>Businesses generally use an expense claim system where a mileage log is kept and the finance team organise a reimbursement.</td>
</tr>
<tr>
<td><strong>Distances</strong></td>
<td>A particular utility spoken to has nearly 1 million kilometres travelled in a year within its <em>Grey Fleet</em>, with 70% coming from its apprentice demographic.</td>
<td>NFPs service areas across the country, including rural and remote. They will likely have urban and regional offices but employees may be required to travel long distances to access clients and regional offices.</td>
<td>Distances travelled in a business vary widely based on job role and location. They can vary from infrequent to frequent, and from urban/local to regional.</td>
</tr>
<tr>
<td><strong>Age of Vehicles</strong></td>
<td>Light commercials, if owned by a utility, would be quite new but this can vary in the <em>Grey Fleet</em>. Vehicles (mainly light commercials) can be expensive so employees may be inclined to purchase second hand if required to drive their own vehicle. Older vehicles are common for younger employees.</td>
<td>Vehicles owned by NFP groups are generally less than 3-5 years old. <em>Grey Fleet</em> vehicles vary widely in age, but are generally older. Drivers are often required to complete an authorisation form stating the roadworthiness of the vehicle.</td>
<td>Businesses will generally have restrictions about what vehicles can be used for work purposes. For example, a business interviewed had a maximum of 80,000km for a second hand vehicle.</td>
</tr>
<tr>
<td><strong>Income Levels of Drivers</strong></td>
<td>Income levels will be determined by level of qualification and job role.</td>
<td><em>Grey Fleet</em> drivers can vary from volunteer roles to senior management, so income levels vary.</td>
<td>A <em>Grey Fleet</em> driver’s income varies based on job role. A casual employee could be travelling between offices, but a regional manager could be too.</td>
</tr>
<tr>
<td><strong>Visibility of Grey Fleet</strong></td>
<td>Although <em>Grey Fleet</em> is known to be used within the utility, there is no regime and its management is poor, leading to low visibility of the risks involved.</td>
<td>NFP management is somewhat aware about <em>Grey Fleet</em>, but not necessarily aware of the risks involved. As costs are always an issue for a NFP organisation, <em>Grey Fleet</em> may be perceived as a cheaper option.</td>
<td>There is generally little understanding of <em>Grey Fleet</em> liability, even though businesses can identify who is driving within the <em>Grey Fleet</em> by monitoring expense claims for vehicle kilometres travelled. This, however, only captures those making an expense claim.</td>
</tr>
<tr>
<td><strong>Age of Employees (Driving Experience)</strong></td>
<td>This varies due to the wide variety of job roles, although the main demographic driving to and from sites in the <em>Grey Fleet</em> are apprentices in the high-risk insurance category of 17-25.</td>
<td>This varies widely in a NFP as providers can support anyone from youth clients to aged care residents. Capacity to provide care is often prioritised over driving experience.</td>
<td>A business has a wide variety of ages in its employee base, and thus a wide variety of driving experience. These are based on qualification, job role, demographic of the area, etc.</td>
</tr>
</tbody>
</table>
2. **How do I manage the Grey Fleet Risk?**

2.1. **What are the responsibilities in managing Grey Fleet safety?**

While those responsible for managing an organisation's fleet are also responsible for managing its Grey Fleet, safety is not only the responsibility of the fleet manager. Due to the complexities within the safety of Grey Fleet, managing Grey Fleet safety will require contributions from a range of people with specific knowledge and relevant skills (see Table 4). The organisation, and many people within it, have a duty of care when it comes to Grey Fleet safety. As discussed in Section 1.4.1, organisations are legally required to provide a safe working environment for workers while operating a vehicle and on the road. Under the Work Health and Safety Act (2011), the organisation also has a duty of care to anyone who may be affected by the worker’s activities while operating the vehicle or driving on the road. In addition to the obvious legal risks, the potential for fines and damage to an organisation’s reputation are often further motivators to meet these responsibilities.

To help develop and implement a Grey Fleet policy, establishing a working group, including people responsible for human resources, finance, health and safety and environment/sustainability in your organisation, is recommended (Energy Saving Trust, 2016). Ensuring all workers and managers are aware of their responsibilities in using Grey Fleet vehicles is a key challenge in implementing a Grey Fleet policy. An initial step in managing Grey Fleet safety and risk is to identify your key stakeholders.

2.2. **Who are the stakeholders?**

A Grey Fleet policy will only be effective if there is support for it within your organisation, so it is important to involve stakeholders from the beginning and throughout the process. This section will help organisations identify the key stakeholders and how they need to be engaged with safely managing Grey Fleet.

Table 4 outlines the key stakeholders in Grey Fleet safety management and compliance. It provides an overview of why they are needed, responsibilities, questions to be asked, pros and cons of each stakeholder’s involvement, and strategies for improving Grey Fleet safety management. An organisation can use this matrix to help identify the chain of responsibility and assign responsibility within the organisation.

Implementing such a matrix into a Grey Fleet safety management plan can provide clarity to a workforce about knowledge, activities and responsibilities required. When developing a responsibility assignment matrix, ensure consideration is given to those personnel who are legally responsible and that the process includes everyone who is required to be involved. External stakeholders, such as clients, contractors or family members, should be incorporated within the safety management system, particularly as some may be present within the vehicle.
### Table 4: Roles and responsibilities

<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Key activities/skills</th>
<th>Why they are needed</th>
<th>What questions they should be asked</th>
<th>Pros</th>
<th>Cons and how to manage them</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Executive Officer, Chief Financial Officer or Business Owner</td>
<td>Overseeing all company activities.</td>
<td>To ensure all managers are meeting their requirements and responsibilities in regards to the Grey Fleet, and to ensure all management practices are undertaken to achieve the highest level of safety.</td>
<td>Are you aware of Grey Fleet roles and responsibilities of all members of your organisation? Do you have an oversight plan to ensure everyone is meeting obligations?</td>
<td>This person provides a final point of call for any employee who is having issues with the Grey Fleet, or for an employee who has questions about the Grey Fleet.</td>
<td>Organisations can be large and it can be difficult for one or two individuals to oversee managers of all departments. This can be overcome with a chain of responsibility.</td>
</tr>
<tr>
<td>Fleet Manager</td>
<td>To manage the traditional fleet and the Grey Fleet.</td>
<td>To ensure all Grey Fleet management aligns with traditional fleet management.</td>
<td>Are you aware of the additional risks involved in Grey Fleet?</td>
<td>Fleet managers are already aware of the risks associated with managing a fleet.</td>
<td>May not know the extra risks a Grey Fleet can pose. Not willing to manage Grey Fleet.</td>
</tr>
<tr>
<td>Direct/Line Managers</td>
<td>Directly manages other workers and operations within an organisation and reports to a higher ranking manager.</td>
<td>Ensure workers use the most efficient, economic and safe means of travel and understand their responsibilities to ensure vehicles are legal, safe and well maintained. Verify the insurance status of their workers. Check vehicle documents before first use for business purposes and then annually. Follow monitoring, approval and reporting procedures.</td>
<td>Are you managing the Grey Fleet is one of your responsibilities?</td>
<td>Have a direct relationship with the workers and are able to oversee Grey Fleet management.</td>
<td>May not see it as their responsibility, rather as only the responsibility of the fleet manager.</td>
</tr>
<tr>
<td>Driver/Vehicle Owner</td>
<td>To be forthcoming about all maintenance, registration, licencing and insurance issues.</td>
<td>To undertake daily duties within the Grey Fleet, and to provide the Grey Fleet vehicle.</td>
<td>Are you correctly licenced? Is your vehicle registered and roadworthy?</td>
<td>Vehicle is owned by the worker and they will be more comfortable driving it.</td>
<td>Worker may not disclose issues with the vehicle.</td>
</tr>
<tr>
<td>Site or Area Manager</td>
<td>Oversee daily undertakings for the organisation.</td>
<td>To ensure all parties involved in the Grey Fleet are meeting requirements and responsibilities.</td>
<td>Are you aware of who in the organisation has which roles?</td>
<td>Understand the importance of work health and safety.</td>
<td>May be unaware that roads are deemed a workplace when a worker has to drive for business purposes.</td>
</tr>
<tr>
<td>Human Resources Advisers</td>
<td>Responsible for hiring workers and maintaining well-being of all workers.</td>
<td>Understand how to manage Grey Fleet and ensure correct processes are implemented. Ensure drivers understand they need to be responsible when mobile and that safe driving within the Grey Fleet is a KPI.</td>
<td>Are you aware of your role in the management of Grey Fleet?</td>
<td>Are aware of workers' rights and the correct processes for reimbursing workers.</td>
<td>May be unaware that they have a key role in the management of Grey Fleet.</td>
</tr>
<tr>
<td>Health and Safety Department</td>
<td>Manage the health and safety of workers.</td>
<td>Ensure all policies and practices meet the safety requirements legislated and ensuring safety of all workers and other road users.</td>
<td>Are you aware there are different safety concerns for Grey Fleet than regular fleet? Are you aware of the legislation?</td>
<td>Understand the importance of work health and safety.</td>
<td>May be unaware private vehicles are part of the fleet and the roads are deemed a workplace when a worker has to drive for business purposes.</td>
</tr>
<tr>
<td>External (e.g. Clients, Family, Contractors, Legal Personnel)</td>
<td>Undertake activities for the organisation or employ the organisation to undertake activities.</td>
<td>If Grey Fleet is required as part of the process that the external person is involved in, they need to be aware of the organisation’s Grey Fleet policies and adhere to them.</td>
<td>Are you aware of the Grey Fleet policies and practices within the organisation you are working in collaboration with?</td>
<td>May be able to provide external feedback on Grey Fleet management practices.</td>
<td>Not a direct member of the company so will be unaware of Grey Fleet management practices within the organisation.</td>
</tr>
</tbody>
</table>
3. **Core safety elements**

In considering the core safety elements of managing safety in a *Grey Fleet*, this guide has taken a risk-based approach to help organisations develop or enhance their systems. A key to the risk management approach is understanding:

- the culture within your organisation
- what is practicable versus expected
- what is the role of mobility within your organisation, and
- what is the scale of the job and tasks that require a *Grey Fleet* being utilised?

This section outlines key information to be considered and a checklist. The aim is for organisations to draw on this material, use it to enhance their approach and to adapt it to their *Grey Fleet* safety culture.

3.1. **Risk management approach**

A risk management approach is imperative to help organisational operations manage *Grey Fleet* vehicle safety. The first step in a risk management approach is to consider what the issue is and why you should care. Once these questions have been answered, you can ask yourself, what can I do to manage this issue?

Organisations can utilise and adapt a typical risk management framework that has proven useful in other work activity sectors. **Figure 3** outlines six key steps that can be efficiently applied to the *Grey Fleet* setting.

**Figure 3: Six key steps to effective Risk Management of Grey Fleet**

1. **Hazard Identification**
   - What hazards are associated with your *Grey Fleet*?

2. **Risk Identification**
   - What are the risks of these hazards? What can happen and how can it happen?

3. **Risk Assessment and Evaluation**
   - What is the likelihood of these events occurring and what are the potential consequences? Analyse the risk to determine likelihood, consequences and an estimated level of risk.

4. **Risk Mitigation and Treatment**
   - What strategies and initiatives can and will be implemented to reduce risk?
   - Organisations may need to consider a range of strategies and initiatives directed not only at the driver and driver behaviour but also consider those strategies within the complexities of their relationship to the vehicle, the road environment, organisational processes and policies, people and legislation.

5. **Risk Monitoring**
   - The work driving environment is dynamic so strategies and interventions introduced to mitigate risk should be constantly re-evaluated, monitored and improved.

6. **Roles and Responsibilities**
   - It is crucial to identify key personnel and their responsibility in *Grey Fleet* processes and activities. Organisational structures are diverse, so consider “who are the key personnel with responsibility, what role can they play in managing *Grey Fleet* risk and what activities can they do to mitigate risk?”
3.2. How can an organisation help?

Many organisations cite privacy concerns in suggesting checking a worker’s driver's licence is too hard and it cannot be done. However, licensing and driving history can (and should) be checked, providing the correct processes and procedures are followed.

Incorporating a code of conduct for driving into all employee work role descriptions and driving obligations allows licensing and history checks to be completed. While a third party cannot contact authorities to discuss other people's licencing and demerit points, a driver can obtain their own licence history check and provide it as a condition of employment to satisfy set KPIs. By including driving in an employee's job description, contract or KPIs, an organisation can ensure drivers possess the appropriate skills and licence to drive for work. This means the employee is contractually obliged to demonstrate they have a current driver's licence and show their driving history to the organisation when asked. This can be undertaken at random or as part of an annual review. This same method can be used to limit the types of vehicles used for work purposes and require drivers to keep records of the mileage they undertake for work purposes. Technological aids, such as portable telemetric devices that monitor harsh braking, can also demonstrate a driver’s history and driving style.

Another method an organisation can use for improving safety within a Grey Fleet is to undertake regular team meetings, which give workers the opportunity to peer assess the Grey Fleet vehicles through visual checks. This ensures Grey Fleet vehicles are maintained to a high safety standard and that workers know what to look for when ensuring the safety of a vehicle.

Action: Ask yourself...

• What are the hazards that can be identified within your own Grey Fleet operations?
• For each hazard identified what are the potential risks?
• What could happen that may affect the health, safety and well-being of people?
• How could that happen?
• What people could be involved?
• What are the potential risks for each of the hazards identified?
• What is the likelihood of something happening? Is it likely, probably unlikely?
• If something was to happen what are the potential consequences in regards to people, community, and the organisation?
• For each hazard, situation and circumstance identified what strategies can you introduce to reduce the safety risk?
• For each hazard and situations identified who are the people involved or responsible for implementation of a risk management process
• What resources are required to progress the Grey Fleet safety strategies?
3.3. **Vehicle safety**

Ensuring workers are safe in their vehicles when they are driving in the *Grey Fleet* is a key responsibility of the organisation. Within the organisational context, an initial step is ensuring a minimum safety specification for the type of vehicle that may be used within *Grey Fleet*. The organisation needs to have a policy outlining the minimum safety specification of vehicles, preventing workers using vehicles that are not appropriate and of a specified safety standard for the driving task. Examples of safety specifications could include vehicle type, minimum or maximum age, exclusions of sports modes, exclusion of certain extras (such as large exhaust or spoilers), and a minimum ANCAP safety rating or minimum level of required safety features. Features that are required and features that are excluded should be tailored specifically to the requirements for your workers and your organisation.

**Case study: No awareness of the organisation’s exposure**

A new fleet manager attends a business event on educating organisations about their responsibilities regarding workplace road safety. At the event, the manager learns a vehicle is a workplace and the organisation has a legal responsibility to provide a safe environment for its workers. The fleet manager is shocked to learn that workers using their own vehicle for providing ‘meals on wheels’ services for the organisation is also considered a workplace and known as *Grey Fleet*.

The manager is concerned several workers boast they drive ‘bombs’ and have only CTP cover, with the mileage paid by the organisation acting as a supplement income. These workers considered their vehicles disposable; if involved in a crash, they just got a new vehicle and continued their work. Their employer had never previously worried about *Grey Fleet*.

**Case study: Am I exposed driving a client’s car? The double grey risk**

A community transport organisation provides mobility and access for the elderly. The volunteer-based organisation provides a fixed rate per kilometre to its workers. The organisation has strong systems for managing its *Grey Fleet*, ensuring vehicles are well maintained, properly insured and fit-for-purpose. The organisation’s main concern is when a volunteer arrives at a client’s property and the client insists they use their vehicle to transport the client to various appointments.

The organisation is faced with the issue of managing the demands of the client but also ensuring their worker is in a safely maintained and appropriately insured vehicle.
3.3.1. **Maximising Grey Fleet safety**

All organisations aim to provide workers with the safest vehicles practicable for the organisation. For *Grey Fleet*, drivers are being asked to provide the safest vehicle reasonably practicable. For larger organisations, especially those that provide a lease, the expectation would be 5 star ANCAP-rated vehicles within a minimum age. The minimum standard safety level is determined by the level of support provided by the organisation. What is crucial for all organisations is to be able to identify the size and make-up of their *Grey Fleet* and have a plan to improve its composition and safety standards over time. The following outlines elements that aim to help this to occur.

3.3.1.1. **Roadworthiness of vehicles**

Driving a vehicle that is roadworthy is a critical factor in the safety of your workers and other drivers on the road. Roadworthy vehicles are fit for use on the road and comply with standards for wheels, tyres, steering, brakes, seatbelts, lamps, reflectors, exhaust, emission controls, windscreens, windscreen wipers, vehicle body and chassis.

**Action: Ensuring roadworthiness of Grey Fleet vehicles**

- Roadworthy vehicle as a minimum (these requirements vary between states).
- Ensure an independent expert has ticked off each vehicle.
- What your organisation deems as roadworthy should encompass components of safety. These are not hard and fast – decide what these should be for you.

Standards vary across borders so if vehicles are used nationally organisations should keep this in mind when deciding which standards to use (Government of South Australia, 2017).

3.3.1.2 **New car safety – ANCAP ratings**

ANCAP, the Australian New Car Assessment Program, provides an independent assessment of a vehicle’s safety, with a score of 1-5 stars given based on such evaluation criteria as likelihood for serious injury of drivers, front seat passengers and pedestrians, and the vehicle’s capability to avoid a collision. The [ANCAP website](#) also provides a list of safety features that can improve the safety of the driver.

To provide consumers with the safest cars possible and encourage continuous improvement in vehicle safety design, ANCAP has introduced a date stamp component to its ratings after mid-2014, signifying the rating year requirements against which the vehicle has been tested (e.g. “Tested 2014”). This means the specific evaluation criteria used for the ANCAP assessment is listed on the ANCAP website, allowing organisations to ensure their *Grey Fleet* vehicles are up to the safety standard their policy outlines. For more information on vehicle purchasing and ANCAP safety ratings, see the [NRSPP’s Guide to Development of a Safe Vehicle Purchasing Policy](#).
3.3.1.3. **Evaluating the safety of older vehicles**

Transport Accident Commission's (TAC) [howsafeisyourcar.com.au](http://howsafeisyourcar.com.au) website provides the information required to examine the ANCAP safety rating of a used car. By searching on the make and model of a car and its year of manufacture you can access:

- Used car safety report
- Base model safety features
- Driver protection rating (the ANCAP star rating), and
- Protection for other road users rating.

This information can help show whether a vehicle is suitable for use within the **Grey Fleet** (based on your organisation's [minimum safety requirements](#)). ANCAP assessments are specific to that particular year so when checking the ANCAP rating of an older vehicle, ensure the safety features list matches what your organisation requires. In recent years, ANCAP testing has moved from passive safety test performance towards active collision avoidance technologies.

Another resource for assessing the safety ratings of older vehicles or used vehicles is the [RACV’s webpage on Used Car Ratings](http://www.racv.com.au/), which has a star rating system similar to ANCAP.

For more information, see the [NRSPP’s webinar: ANCAP – Not all 5 star cars are created equal](#).

---

**Action: Developing a minimum vehicle safety standard for Grey Fleet**

- Develop a policy for the minimum ANCAP safety rating of vehicles in your **Grey Fleet** or a minimum level of safety features, which you require.
- Collect the manufacture age of vehicles in the **Grey Fleet** and break down the **Grey Fleet** within your organisation by vehicle type.
- Collect ANCAP safety ratings and date stamp of vehicles in the **Grey Fleet**.
- Compare the evaluation criteria for the ANCAP rating for the year of manufacture to the minimum safety requirements for vehicles in your **Grey Fleet**.
- Educate your workers on the importance of ANCAP safety ratings and consider strategies to help modernise the **Grey Fleet**.
- Develop a **Grey Fleet** report for the entire organisation to view, making everybody aware of the safety level of the **Grey Fleet** and increasing understanding of the need to modernise over time.
3.3.2. Guidelines for considering vehicle safety and ratings

There are several practical considerations in an organisation's Grey Fleet operations relating to the use of safer, higher ANCAP-rated vehicles. Every organisation should at every opportunity encourage Grey Fleet vehicle owners to purchase and use the highest safety rating car available, providing the utmost safety should a Grey Fleet driver and vehicle occupants be involved in a crash. In some organisations operating Grey Fleet, however, there may be particular challenges associated with initial uptake and adoption of 5 star vehicles. In the health care or not for profit sectors that utilise volunteer services, for example, not all volunteers can afford to purchase a newer vehicle.

**Action: Ask yourself...**
- Am I aware of the risk profile of my moving workforce?
- Do I know the average age of vehicles in my Grey Fleet?
- Older vehicles often have less safety features. What risks can you think of that come along with an older vehicle?
- How can we work with our people to modernise our Grey Fleet over time?

**Case study: Hypothetical vehicle safety decision making**

In attempting to have the safest Grey Fleet possible, consideration must be given to what is reasonably practicable for the employee and the organisation. For example, a 19-year-old temporary receptionist works for a large company. As this person is a temporary employee, they travel between different offices during the day using their own private vehicle, thus included as Grey Fleet. As a recent high school graduate, the employee is unlikely to have the means or can justify the expense of purchasing a new 5 star ANCAP safety rated vehicle. Alternatively, rather than allowing this employee to drive their older vehicle in the Grey Fleet, you could look at other transport options (Table 1) such as a pool vehicle.

In this situation, the organisation may consider flexibility in its guidelines that require a 5 star ANCAP-rated vehicle. A discussion will need to occur between the organisation and the young employee to determine options associated with vehicle safety and whether the vehicle is suitable for work purposes. Other options may include sourcing an older 5 star ANCAP rated vehicle, or ensuring the employee is aware of the driving risks and safety rating of their vehicle. The employee and the organisation may also incorporate some extra risk management processes to mitigate risk in other ways, such as a driver training session in the driver’s personal vehicle where an instructor can make them aware of blind spots, braking distance, safety features and so on. Section 7.4 outlines an example of a risk matrix that organisations can use to understand what risks they face in their Grey Fleet.
3.4. The driver’s responsibilities in vehicle safety

3.4.1. Maintenance/inspection standards

A well-maintained vehicle is a safer vehicle. Regularly serviced vehicles are:

- Much more reliable
- Cheaper to run – brief but frequent checks can help save fuel, improving efficiency
- Less hazardous for drivers because of reduced wear and tear
- Less likely to suffer breakdowns and collisions, and
- Helpful in developing your business, making your fleet more efficient, your customers satisfied and enhancing your reputation.

The vehicle’s Owner’s Manual is the best indication of what each specific vehicle requires to be checked and how often. If a preventative maintenance schedule is implemented, it will reduce costs (overall maintenance, operations, insurance, downtime, fuel consumption, etc.) and likely increase customer satisfaction. Safety will also be greatly improved (as well as a vehicle’s roadworthiness) and there will be reassurance that all vehicles (and your company) are complying with legal standards.

Organisations should consider a service discount for workers who are regularly using their vehicle in the Grey Fleet. This will help ensure workers are having their vehicles serviced regularly to increase safety without incurring unwanted out-of-pocket expenses as well giving the company the ability to monitor vehicle standards.

Table 5: Options an organisation can implement to promote vehicle maintenance

<table>
<thead>
<tr>
<th>Method</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Random Checks</td>
<td>Fleet managers randomly check vehicles within their organisation’s car parks for tyre condition, tyre pressure, visual condition, etc.</td>
</tr>
<tr>
<td>Agreement of Service</td>
<td>A more comprehensive approach can be fleet managers having agreed access to worker vehicles in the car park to check oil levels, maintenance status, tyre status, visual condition, water level, etc.</td>
</tr>
<tr>
<td>Scorecard Approach</td>
<td>An agreement with mechanics that provides the ability to report status of Grey Fleet within the car park before they are serviced. They should also provide the organisation with a better deal on servicing their vehicles.</td>
</tr>
</tbody>
</table>

3.4.2 Breakdown planning

As part of an organisation’s safety responsibilities associated with Grey Fleet, organisations should have a vehicle breakdown policy and procedure that outlines the process an employee is to follow in the event of a vehicle breakdown.

Any breakdown plan should consider the actual breakdown plan and emergency roadside assistance. The degree and level of a breakdown plan will vary depending on where the journey takes the driver. A regional or remote journey over an extended period will require significantly more planning than just a short urban trip. Pulling over ‘safely’ next to a freeway versus the edge of a regional road involves different considerations.

Addressing the breakdown can also be problematic; employees may not have the skills to change a tyre or an organisation’s policy may prohibit it, making roadside assistance crucial. Roadside assistance may not be possible in regional or remote areas, so the driver needs to understand the basics and a journey management plan should be in place (Section 3.5).
3.4.3. Insurance

A Grey Fleet driver must ensure they have the right insurance policy for their vehicle and use. Most people will tick commuting on their insurance policy but they will not tick business purposes (either they will not want to or they may not be aware they need to) because it may result in a further cost of 17-20% on their policy. Alternatively, the employee may begin driving their car for work after they get the insurance policy, and is unaware that the insurance policy requires an upgrade. This is not the sole responsibility of the driver, as the organisation has a responsibility to inform the driver of Grey Fleet insurance requirements. The employee also needs to be made aware that this extra cost is tax deductible. One option to ensure drivers are correctly insured without them being out of pocket is for the organisation to cover the difference in insurance premiums.

**Case study: Anonymous – the importance of a breakdown plan**

As part of this organisation’s Grey Fleet policy, drivers must have the correct insurance for driving for work purposes but also be covered by an emergency roadside help program, either by an independent provider or as part of comprehensive cover.

Its Grey Fleet policy also includes educating employees about what to do in a breakdown. Employees know who to contact in the event of a breakdown and will be able to make educated decisions about where the safest place to wait for help is (whether that’s in the car or elsewhere). Rather than providing a blanket set of rules, these education programs are situation based; the organisation is arming employees with the knowledge they need to make a decision based on the situation at hand.

Another important aspect of this organisation’s Grey Fleet policy is including provisions for employees travelling away from their usual place of work or away from home for overnight trips, including emergency accommodation and budgets for emergency hire cars or taxis.

**Action: Ask yourself...**

- Do your drivers travel extended distances that may include regional or remote roads?
- Do you want your drivers to change tyres? Do they have the skills to do so?
- Are you aware before a driver starts a journey where they are travelling and what support they may need should an issue arise with their vehicle?
- Do you have a breakdown plan for urban, regional and remote travel for your drivers?
Considerations need to be made of the type of policy that is required, based on the frequency of driving within the Grey Fleet. There are six main types of insurance that can be purchased for vehicles, including Grey Fleet (QBE Insurance Box, 2017):

**Personal, or personal and commuting** comprehensive insurance is for when a vehicle is used solely for personal use and commuting to work, but generally covers ad hoc or incidental work trips. This is where driving in the Grey Fleet occurs on a rare occasion.

**Business use** for a personal vehicle incurs a higher premium for various categories supported by each insurer. Staff using their own car regularly during work are recommended to secure this level of cover from their insurer. If a personal vehicle is used regularly for work purposes and it is not declared to the insurance company (or not covered fully in the policy) an insurer can void the insurance policy in the event of an incident.

A **commercial vehicle** policy is purchased under an ABN or business name and covers all work trips. This is best for business who use company owned light commercial vehicles for the employees to either drive on site or to and from site.

A **fleet policy** generally covers staff using their own vehicle but it may not cover consultants or contractors using their private car for company purposes. Some of these policies may have a clause for the occasional Grey Fleet trip made by a contractor but this needs to be discussed with the provider.

A **business pack** includes employee liability but these policies generally do not cover staff using their private cars for work purposes; only vehicles owned and operated by the company are generally covered.

A **Grey Fleet policy** uses telematics for a private car used personally and as an integral part of earning an income or performing a job. This provides protection for staff and their employers. This level is ideal for contractors and consultants.
Case study: Ensuring the worker has the right insurance

Organisation X has long-established basic systems to manage the movement of its Grey Fleet. Key focus areas include vehicle maintenance, driver licensing and appropriate insurance. It has a simple but rigorous insurance process where workers provide:

- copies of vehicle insurance that clearly indicates it includes work related travel, or
- they can demonstrate they have discussed with their insurer that they may drive for work related purposes but the level is so low their policy is not affected.

The organisation wanted a clear record that workers were insured when they travelled for work related purposes and the level of insurance reflected their frequency of Grey Fleet travel. The organisation reminds its Grey Fleet drivers at tax time that additional insurance costs incurred because they drive for work are claimable.

Action: Ask yourself...

- Are your drivers insured when they drive their vehicle for your work related purposes?
- Do you engage with your workforce to educate them around how types of vehicle insurance varies depending on personal and work related travel?
- Has your organisation considered covering the increase in insurance cost from personal to Grey Fleet?
3.5. **Journey management, worker mobility and tasks**

Journey management, the mobility of workers and tasks workers need mobility to complete vary. A main factor to consider is whether the journey is in an urban setting on surfaced roads or in a rural setting on highways and unsealed roads. There are risks in both scenarios and managing these risks requires different considerations. For example:

- A driver in an urban setting is often required to deal with traffic congestion, many modes of traffic (cyclists, pedestrians, buses, trucks, motorcyclists, etc.), unknown routes, traffic lights and residential spaces.
- A driver in a rural setting requires awareness of the condition of unsealed roads, fatigue, the effects of long distance driving and avoiding animal collisions.

3.5.1. **Mobility for work**

An organisation’s expectations and approach to mobility requirements of the workforce impact risk exposure. Journey management is a crucial element but actually understanding the mobility and associated risk of an organisation’s workforce and movements requires further consideration. The type of work, number of jobs expected of a worker in a day, and distance between locations can significantly impact the driver and subsequently influence driving behaviour. Another important consideration is whether the mode of transport is suitable to the task the worker will be performing. For example, public transport is not a viable option for a worker who needs to carry a large amount of equipment to complete required tasks.

**Case study: Is the patient the priority?**

An employee, Bob, working in the health care sector needs to travel between regional towns to assist several clients. Bob travels these areas often and is familiar with the route and travelling times. However, these field travel trips often result in long days due to the vast distances between towns. Bob finds it more convenient to use their own vehicle as it is easier to go straight from home and it’s easier to keep the required equipment in Bob’s own car.

Having worked a long day, Bob is often pulling into the evening’s accommodation or back home after dark, however the day’s schedule is still within the organisation’s travel and fatigue guidelines. Bob also finds that being behind schedule is compounded as many clients are somewhat lonely and have befriended Bob, looking forward to the “social aspect” of the scheduled visits. Bob also has a soft spot for clients, often stating the client “needs them”. During the day, Bob receives a phone call with a request from the organisation to see another client nearby who has contacted the organisation with an urgent issue. This is a common occurrence and rather than reschedule or have the organisation incur extra expense sending another worker, Bob squeezes the client into the day’s plans, placing pressure on an already tight travel schedule.
3.5.2. Driver education

While organisations have legal responsibilities towards journey management, they can also facilitate measures for drivers to conduct their own journey management planning. This means drivers will be aware of the route they are going to take and all the risks involved because they helped in the planning process. This adds an educational element into journey management, empowering the driver to make informed decisions about their own safety. For example, educated drivers will make informed decisions in a breakdown situation that maximise their safety and are more likely to have the correct insurance cover.

3.5.3. Journey management and travel plans

Consideration should be given at organisational level to developing and adopting processes that manage risk through appropriate work task scheduling and travel. Journey management plans should also consider particular Grey Fleet issues identified that may differ from traditional fleet. A typical journey management plan may include risk mitigation strategies relating to the driver, the vehicle, the environment, workload scheduling and relevant road legislation.

Examples relating to Grey Fleet may include:

- Driver related considerations such as type of worker, fatigue, health and well-being
- Vehicle related considerations such as vehicle maintenance and safety, breakdowns, equipment and vehicle suitability
- Environment may include city versus remote locations, distance to travel, road conditions, and
- Work scheduling should consider tasks allocated and the journey required.

Figure 4 provides a working example of a Journey Management Plan and potential issues.

**Action: Ask yourself...**

- Does this type of incident occur within your organisation? It can occur in any sector when the focus is the customer, closing the deal, getting services restored or chasing extra overtime pay.
- What processes does the organisation have to monitor job role creep and travel expectations?
- What strategies are in place regarding vehicle choice decisions?
- What are the organisation’s expectations about travel flexibility when plans change during the day?
3.5.1. A risk based approach to Grey Fleet frequency of travel

Rather than a one size fits all approach, the task of managing a Grey Fleet should be structured to engage all workers around managing risk. The size of the risk for the worker and organisation depends on the frequency, type of journey and distance travelled by the Grey Fleet. So when approaching how to best manage Grey Fleet frequency of travel risk, an organisation should consider utilising a work trip risk evaluation strategy that establishes risk based on frequency of journey. An individual using a Grey Fleet vehicle once or twice a month, for example, is less likely to be exposed to as much safety risk as a person driving Grey Fleet daily.

Table 6 shows such a framework and how processes may apply differently depending on the type of Grey Fleet driver.

**Table 6: Framework for differences in processes**

<table>
<thead>
<tr>
<th>Worker Trip Risk of GF Drivers</th>
<th>Trip Measures &amp; Systems</th>
<th>Grey Fleet Driver Demographic Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Infrequent User</td>
<td>Regular User</td>
</tr>
<tr>
<td>Definition</td>
<td>1-4 trips a month</td>
<td>4-10 trips a month</td>
</tr>
<tr>
<td>Travel type</td>
<td>Local to organisation or part of commute</td>
<td>Urban travel</td>
</tr>
<tr>
<td>Distance</td>
<td>Short</td>
<td>Short</td>
</tr>
<tr>
<td>Risk Management GF Systems Implemented</td>
<td>Process 1…</td>
<td>Required</td>
</tr>
<tr>
<td></td>
<td>Process 2…</td>
<td>Required</td>
</tr>
<tr>
<td></td>
<td>Process 3…</td>
<td>NA</td>
</tr>
<tr>
<td></td>
<td>Process 4…</td>
<td>NA</td>
</tr>
<tr>
<td></td>
<td>Process 5…</td>
<td>NA</td>
</tr>
</tbody>
</table>

The risk step in a risk management approach to journey frequency is to identify the demographic of Grey Fleet drivers to establish a Grey Fleet user’s category of frequency and type of travel. While an organisation is ultimately responsible to reduce risk, the level and type of risk mitigation strategies may depend on the frequency of travel and, subsequently, category of user. Although establishing user frequency to categorise risk is initially undertaken, management need to ensure this process remains dynamic and is regularly monitored to ensure an individual user’s Grey Fleet risk profile relating to travel frequency remains appropriate.
4. **What does progress in Grey Fleet safety management look like?**

Managing risks and improving safety within an organisation’s *Grey Fleet* is a journey that involves participation from all levels of an organisation. To drive continuous improvement in managing *Grey Fleet* risks, we need to go beyond compliance to policies and procedures and move towards safety maturity. Safety maturity is a way for organisations to measure their safety culture and how it changes over time, which will be seen in reduced risk and incidents. When the final stage of safety maturity is reached (see **Figure 5**), the organisation is continually improving its *Grey Fleet* management and will have a low-risk *Grey Fleet* situation others can learn from.

Safety maturity links into the KPIs of an employee who undertakes driving as part of their role. As mentioned in Section 3.2, if management aspects of the *Grey Fleet* are included in employee KPIs, an organisation has the right to insist these are being met, further developing a safety culture within the organisation. Organisations need to develop KPIs to reflect their type of business and *Grey Fleet* risk.

To achieve excellence in *Grey Fleet* safety management, all members within the organisation need to:

- recognise the risks involved in *Grey Fleet* and how they need to be managed
- understand the risks of *Grey Fleet* and the best ways to manage them, and
- begin managing these risks through the use of worker education.

The evidence included in **Figure 5** can be used to identify where you are and where you need to go to achieve safety maturity within the organisation. They are also a way to make a commitment to achieving the next step and making someone responsible for achieving this progression. For more information on safety maturity, read [NRSPP’s Thought Leadership: Safety Maturity – A Measure of a Safety Culture](#).

**Figure 5: Safety maturity curve for Grey Fleet management**

---

Grey Fleet Safety Management Guide

36
<table>
<thead>
<tr>
<th>Description</th>
<th>Adequate safety systems in place but lack of safety culture, poor prioritising of work driving safety and safety behaviours cause incidents. Incidents are seen as unavoidable and safety is defined as aiming to meet regulations.</th>
<th>Safety is defined as adhering to rules and regulations, policies and procedures. Incidents are viewed as deviations from the rules and preventable. Action is reactionary and only occurs after an incident.</th>
<th>Safety begins to move away from a top-down approach. Employees are willing to work with management to improve the safety of the organisation. Most employees take responsibility for their own safety.</th>
<th>Employees recognise management decisions can influence safety. Employees accept responsibility for their safety and that of others. Through near-miss reporting, incidents can be prevented proactively.</th>
<th>All members of the organisation actively participate in managing safety. Injury prevention is a core value and the organisation has not had a recent incident and strives for continuing improvement.</th>
</tr>
</thead>
<tbody>
<tr>
<td>How Does it Apply to Grey Fleet?</td>
<td>Grey Fleet has been recognised but the organisation does not have a Grey Fleet policy. You need to develop a commitment to managing safety within your Grey Fleet, including a monetary commitment and a review of all (if any) Grey Fleet policies and procedures.</td>
<td>As part of your Grey Fleet management strategy, you need to realise the importance of employee feedback in identifying Grey Fleet risks. This includes developing personal safety within your workers so they understand their role in maintaining their safety while driving in the Grey Fleet.</td>
<td>The Grey Fleet management plan must include all members of the organisation to spread awareness of Grey Fleet risks. All members of the organisation who have a responsibility towards Grey Fleet must be aware of their role and risks they are managing.</td>
<td>All members of the organisation work together to manage Grey Fleet risks. This helps develop consistency in procedures as well as consistency in the action, behaviours, belief and safety culture of Grey Fleet drivers.</td>
<td>Continuous improvement is achieved by consistent review and refining of Grey Fleet management processes. This means there is constant improvement in hazard awareness, risk management, near miss reporting and good driving behaviours. Everyone is driving within Grey Fleet policy and sharing experiences and feedback.</td>
</tr>
<tr>
<td>Safety Maturity Evidence</td>
<td>• Have commenced developing and revising Grey Fleet policy</td>
<td>• Number of Grey Fleet vehicles identified</td>
<td>• Committed developing employee surveys</td>
<td>• Stakeholder roles and responsibilities established</td>
<td>• Benchmarking processes developed and undertaken internally and externally</td>
</tr>
<tr>
<td></td>
<td>• List of topics to include developed</td>
<td>• Exposure indicators established (e.g. annual km)</td>
<td>• Employee surveys undertaken</td>
<td>• Grey Fleet safety improvement evident</td>
<td>• Annual Grey Fleet education and training</td>
</tr>
<tr>
<td></td>
<td>• Commenced developing Grey Fleet procedures</td>
<td>• Approval obtained for Grey Fleet policy</td>
<td>• Other relevant Grey Fleet issues identified</td>
<td>• Annual review of Grey Fleet policy and procedures</td>
<td>• Job descriptions include driving as KPI</td>
</tr>
<tr>
<td></td>
<td>• Completed development of risk management framework</td>
<td>• Employee Grey Fleet education campaign commenced</td>
<td>• Evidence indicating employee engagement of Grey Fleet risk management, e.g. 90% compliance with pre-start safety check</td>
<td>• Revised Grey Fleet policies and procedures adopted</td>
<td>• Grey Fleet KPIs developed, adopted and monitored, showing continual improvement</td>
</tr>
<tr>
<td></td>
<td>• Completed development of improved Grey Fleet incident reporting and recording procedures</td>
<td>• Commenced Grey Fleet policy and procedures implementation</td>
<td>• Team meeting talks well attended</td>
<td>• Grey Fleet vehicles 90% ANCAP 5 star</td>
<td>• Grey Fleet fixed agenda item on all team meetings</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• Risk identification and management procedures well adopted throughout organisation</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• Continuous reduction of Grey Fleet incidents</td>
</tr>
</tbody>
</table>

An organisation will progress along the maturity curve for Grey Fleet management if they take the time to develop a progression strategy. Establishing timelines, activities and an accountable person are crucial for success within the strategy. Each organisation should identify KPIs to track success, which are measurable and relevant to its operations.
### Action: Example timeline for safety maturity within your organisation

<table>
<thead>
<tr>
<th>Timeframe</th>
<th>Core Component Activity</th>
<th>Date Commenced</th>
<th>Proposed Completion Date</th>
<th>Completed As Per Specification</th>
<th>Personnel</th>
</tr>
</thead>
<tbody>
<tr>
<td>3 month</td>
<td>Develop Grey Fleet Strategy for policy guide development</td>
<td>August 2017</td>
<td>January 2018</td>
<td></td>
<td>CEO, Fleet Manager, Administrator, WHS Manager, HR Manager, Legal</td>
</tr>
</tbody>
</table>
5. **Guide to developing and implementing a Grey Fleet policy**

A key component for the success of any policy is understanding the implications, processes and procedures required to support the policy. Many of the Grey Fleet hazards and risks we identified in the risk management section will be addressed through Grey Fleet policy. However, an underlying process in developing a Grey Fleet policy is considering potential resources required to support policy implications and identifying barriers to the processes outlined.

This guide provides a structure to progress management of risk associated with Grey Fleet and help identify issues and processes to consider in developing policy. Managing Grey Fleet may initially seem complex but the framework below will help develop an implementation strategy to help create an effective policy for an organisation’s workers. Organisational responsibilities for providing a safe workplace are the same regardless of organisation size, the difference is number of stakeholders involved in its management and what is deemed reasonably practicable.

This implementation process is not intended to provide 100% guidance on how to manage Grey Fleet but rather outline a process to engage an organisation in improving Grey Fleet management. The goal is to get buy-in throughout the organisation and recognise this process will take time and require resources and allocating accountabilities.

![Figure 6: Flow chart of development/implementation of an ongoing Grey Fleet management strategy](image-url)
5.1. Where are the problems and what are the issues?

Developing a Grey Fleet policy begins with an acknowledgement of the broader Grey Fleet issue and then investigating the current situation and systems in place. The organisation needs to know where to start and what to look for to understand its exposure to Grey Fleet risks. To do this, the organisation needs to understand that this will be a significant change process requiring buy-in from the top and engagement from a consulted workforce.

Before commencing developing a Grey Fleet policy consider:

- What Grey Fleet management systems are in place?
- What tools and processes are used to manage the Grey Fleet?
- Is there someone responsible for managing the Grey Fleet? If so, who?

5.2. Establishing systems for Grey Fleet management

Legislation clearly outlines responsibilities to ensure safety with all vehicle operations including Grey Fleet. However, a crucial process in any organisation in Grey Fleet safety and risk management is ensuring evidence of processes is thoroughly recorded, documented and appropriately stored. To ensure Grey Fleet safety and risk management, it is not enough to outline what should be done, but rather in the event of an incident be able to prove what risk management and safety procedures were undertaken (see Section 1.4.4, Have you conducted a Grey Fleet audit?). This case study example is from an organisation implementing these recording systems.

Case study: Contrasting policy between grey and traditional fleet

Within this organisation all drivers in the Grey Fleet and the Traditional Fleet are treated the same way in attending to safety. However, there is a specific Grey Fleet policy, which ensures all staff are aware of the extra risks they are undertaking by using their own vehicle for work purposes. This policy details the requirements for operating a vehicle within the Grey Fleet, and the conditions for reimbursement of kilometres, including that the driver be correctly licensed and the vehicle comprehensively insured. This information is stored in a database within the organisation that can be accessed when necessary. Although these policies are in place, they rely on trust rather than physical evidence, and there is no database to store information on whether the vehicle is roadworthy and properly serviced.

This organisation is working on a mobile phone application that will act as a statutory declaration before a driver begins to drive for work using their Grey Fleet vehicle. This declaration will not only ensure drivers and correctly licensed and the vehicle comprehensively insured, but will also ensure all vehicles are roadworthy, regularly serviced and appropriate for the task at hand. This will allow the organisation to have a comprehensive database of all information relating to Grey Fleet drivers and their vehicles that can be used to prove, in the event of incident, that risk management and safety procedures are in place within the organisation.
The organisation must understand its driving community, *Grey Fleet* composition and safety controls implemented for managing different components. This allows the organisation to identify gaps, providing a base for developing a structured approach to address them.

There is little point beginning development of a *Grey Fleet* safety policy unless all stakeholder buy-in is aligned. It is pivotal senior management understands *Grey Fleet* is a key part of the organisation and a safety risk that requires mitigation strategies, many of which differ from traditional fleet safety management. Ensuring understanding, supporting and backing *Grey Fleet* safety management and the engagement of the workforce is crucial. Senior management also need to be continually involved in the overall *Grey Fleet* safety management process.

A *Grey Fleet* management strategy should consider:

- Who within the organisation will have responsibility, influence or generates *Grey Fleet*?
- What are the questions and answers needed to engage these stakeholders to get their buy-in?
- What are the various aspects of the organisation's mobility task?
- When seeking to identify stakeholders consider exploring answers to the following questions.
  - Do you have a fleet management, mobility or travel oversight policy?
  - Who is responsible for approval of the various elements within above?
  - Utilise Table 4 to understand each stakeholder, who that person is and what type of role or engagement have they had?
- Do you have a code of conduct in place for *Grey Fleet*?
- If workers make travel claims, does this apply to *Grey Fleet*?
- How are *Grey Fleet* mileage claims treated within the organisation?
- What steps need to be taken for the organisation to better manage its *Grey Fleet*?
- What portion of your workers’ *Grey Fleet* driving is a core component of their work role?
- What proportion of workers’ work hours are dedicated to *Grey Fleet* driving?
- Are there stakeholders outside the organisation who should be considered or included in policy development and implementation?

**Action: Ask yourself...**

- What evidence do you have in your organisation of a systematic approach to *Grey Fleet* management?
- Do you have evidence of conversations around *Grey Fleet* safety management?
- Where is the evidence stored? How is it kept up to date? Who is responsible for maintaining the data?
- Are all members of the organisation aware of this reporting system? Is this reporting system transparent?
- How is the information reported? Are all members of the organisation aware of this process?
5.3. **Involvement and alignment of key stakeholders**

Identifying stakeholders who have a role in managing an organisation's *Grey Fleet* does not have to be complicated but it is crucial to identify who they are, what their role is and how they can be engaged. Some stakeholders may be entirely unaware that *Grey Fleet* exists or is even within their remit.

Potential questions for stakeholders to consider include:

- Do they understand what *Grey Fleet* is and their obligations in managing *Grey Fleet* in your organisation?
- Do you know how big your exposure to *Grey Fleet* drivers is within your organisation?
- What do people in your organisation do in their daily/weekly job roles that might contribute to the existence of *Grey Fleet* in your organisation? Who is driving? Think beyond the sales/customer services team; what about procurement, auditors, contractor managers, project managers?
- If the organisation has a *Grey Fleet*, what processes and activities are required to progress its management and safety?
- Depending on where the organisation is in managing *Grey Fleet* safety, an initial step is to consider the structure and content of your *Grey Fleet* policy and identify the organisation's objectives and priorities.

Engaging stakeholders requires a range of tailored strategies and processes based around who the stakeholder is, their role and influence. A range of approaches are outlined below.

5.3.1 **Leadership buy-in**

Using the evidence created and gap analysis from previous stages, engage with CEO (or similar) and the CFO to identify:

- Legislation and why it matters
- Size of the risk
- Current systems in place and where on maturity level
- Gaps, and
- Seek approval to develop *Grey Fleet* safety management systems.

5.3.2 **One-on-one meetings**

Reaching out to a few key stakeholders armed with crucial information on *Grey Fleet* and questions to ask can help build solid foundations. The aim is not to push, scare or force them onto your side, the focus is understanding what they do and don’t know. Let them know leadership has buy-in and a strategy is being developed to oversee a journey towards developing a *Grey Fleet* policy. Some of these stakeholders (see Table 4), which should be informed and invited, include:

- Fleet Manager
- Site Managers
- Human Resources, and
- Safety Department Managers.
5.3.3. Survey of the organisation’s driving community

A simple survey will help you understand who makes up the organisation’s driving community, which will help kick off the conversation with workers around how it should be managed and what it can and should entail. Many workers may not even recognise they are part of the organisation’s Grey Fleet. The survey could explore issues such as Grey Fleet driver habits, journey exposure and Grey Fleet operational processes such as time pressure issues, fatigue, psychological ownership of Grey Fleet vehicles, awareness of legal responsibilities, maintenance, and knowledge of road rules.

5.3.4. Interviews

Larger organisations may wish to interview some workers to explore when and how often they may drive for work related purposes. Some may not know what is work related and what is not, information that can be utilised to inform the range of driving tasks, systems that may need to be developed and education and trained required. Interview questions could include investigating issues such as factors that drivers perceive as influencing their driving and Grey Fleet journey habits, identification of organisational gaps and processes associated with Grey Fleet risk management, and exploring potential driver-identified solutions to improving risk management processes and reporting of incidents.

5.3.5. Workshop with mix of workers

Workers need to be involved in developing any policy to ensure they have buy-in and ownership. Importantly, Grey Fleet workshops can be constructed to include a range of hypothetical work related situations. The workshops could be structured along the following:

1. What is Grey Fleet?
   a. Why it matters to the organisation?
   b. What the law is which underpins a vehicle as a workplace?
2. Who is the organisation’s Grey Fleet driving community?
   a. Survey results
   b. Discussion around options used, and
   c. Hypothetical examples.
3. Define what represents a Grey Fleet:
   a. Infrequent user
   b. Regular user
   c. Heavy user.
4. Developing a Grey Fleet management policy:
   a. Current systems to manage your driving community?
   b. Summary of components that should be considered for inclusion?
   c. What components should be included?
   d. What is needed to support their successful implementation?
      i. Worker side
      ii. Organisation side.
5. Plan and actions to progress.
5.4. Developing internal processes to manage Grey Fleet risks

In developing a Grey Fleet safety policy, the organisation needs to take into consideration a range of internal processes that underpin the safety policy. This should build on what has been identified through the alignment of stakeholders in Section 5.3. The internal processes that an organisation could consider include:

- Outlining a set of principles that are evidence based, practical and able to be applied to Grey Fleet vehicles throughout the organisation.
- During recruitment and ongoing employment, it is important to ensure that following the Grey Fleet policy is included in staff KPIs.
- Key Grey Fleet safety risks across all types of organisations need to be managed utilising internal processes. Examples could include processes associated with maintenance and roadworthiness of Grey Fleet vehicles, insurance policies consistent with work purposes, fitness of drivers for work and journey management.
- The importance of a valid and appropriate driver's licence (e.g. P-plate restrictions taken into account).
- For Grey Fleet design, a process that is not a one-size-fits-all approach but has different controls and oversight that relate to the type of risk. For example, infrequent, regular and heavy user.

An approach based on the use and frequency of use that is 'defined' by workers will encourage them to buy-in to internal systems that need to be developed to support the different types of Grey Fleet driver.

5.4.1. Grey Fleet recruitment process

Incorporating safe driving into recruitment processes is important. All job descriptions for Grey Fleet drivers should include outcome measures satisfying organisational expectations and requirements relating to safe Grey Fleet driving. These could include processes that ensure Grey Fleet drivers possess:

- A valid and appropriate driver's licence (e.g. P-plate restrictions)
- An insurance policy that allows for driving for work purposes
- A roadworthy vehicle that meets ANCAP rating requirements and vehicle type the organisation outlines in its policy, and
- Knowledge of the Grey Fleet safety policy that will be included in their KPIs.
**Case study – Matrix approach for scanning organisation fleet management systems**

Organisation X has a large sales workforce and very mature culture identified as at the Managing Culture stage of maturity (Section 4) in how it approaches Grey Fleet management. The organisation clearly outlines its expectations when employees are on the road and how it supports employees to meet them. The organisation’s safety culture has strong supporting systems established and operates under a just culture approach with clear communication on what is unacceptable. For example, should an employee’s demerit record rise beyond 6 points the organisation offers free driving training. If the number reaches 9, driver training is mandatory and if they lose their licence there is no exceptional licence request. Instead, the employee is terminated because the organisation will not support driving behaviour that is high risk.

However, even with such a strong culture and established systems in place, the organisation had never done a full Grey Fleet or Traditional Fleet audit of its workforce. The organisation created the matrix below to identify its Traditional and supporting Grey Fleet systems by Business Unit (BU). Once it had created the matrix, reviewed system implementation, compliance and monitoring, it identified that BU5 had not been included in any fleet management system. The organisation found it also only had partial (P) driver records for all employees and this had been completely overlooked when using Grey Fleet.

As a result of the audit, the organisation has now developed a strategy that will encompass all business units and fleet types.

<table>
<thead>
<tr>
<th>Road Safety Program</th>
<th>Program Elements</th>
<th>BU1</th>
<th>BU2</th>
<th>BU3</th>
<th>BU4</th>
<th>BU5</th>
<th>BU6</th>
<th>BU7</th>
</tr>
</thead>
<tbody>
<tr>
<td>Online Grey Fleet Support App</td>
<td>iPhone/iPad app for field based staff</td>
<td>✔</td>
<td>✔</td>
<td>☒</td>
<td>P</td>
<td>X</td>
<td>P</td>
<td>✔</td>
</tr>
<tr>
<td>Driver Training</td>
<td>Practical driver training</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>☒</td>
<td>☒</td>
<td>☒</td>
<td>☒</td>
</tr>
<tr>
<td>Online Driver Training</td>
<td>Online driver training</td>
<td>85%</td>
<td>82%</td>
<td>92%</td>
<td>92%</td>
<td>0%</td>
<td>67%</td>
<td>44%</td>
</tr>
<tr>
<td>Car Essentials (refer to Figure 4 – Equipment)</td>
<td>Hi-Vis Vest (for breakdown/emergency), First Aid Kit, Safety Triangle</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>P</td>
<td>P</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>Driver Records (Traditional Fleet)</td>
<td>Driver infringement and accident history – Tool of Trade drivers</td>
<td>P</td>
<td>P</td>
<td>P</td>
<td>P</td>
<td>P</td>
<td>P</td>
<td>P</td>
</tr>
<tr>
<td>Driver Records (Grey Fleet)</td>
<td>Driver infringement &amp; accident history – Grey Fleet Drivers</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Regular Medical</td>
<td>Are our drivers healthy enough to drive?</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
</tbody>
</table>

√ = Yes   X = No   P = Partial

As can be seen from the above matrix, Grey Fleet management of driver records was not considered in any of the Business Units (BU). This was only discovered by taking an overview of the entire organisation to see which business units had road safety programs in place.
5.5. **Consider resources**

Developing and implementing a policy and improving *Grey Fleet* safety will require various levels of resources, depending on the size and scope of the organisation and its *Grey Fleet* operations and circumstances.

Although organisations will not always have the resources required to manage *Grey Fleet* safety, identifying the type and level of resources required and how they can be obtained should be considered. The NRSPP has developed this *Grey Fleet* guide to provide organisations with a framework as a ‘go to’ point for resources that may assist in *Grey Fleet* safety. References to selected resources are summarised in the table.

<table>
<thead>
<tr>
<th>Topic</th>
<th>Resource</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle Safety</td>
<td>NRSPP’s Guide to Development of a Safe Vehicle Purchasing Policy</td>
</tr>
<tr>
<td></td>
<td>ANCAP – How Safe is Your Car</td>
</tr>
<tr>
<td></td>
<td>RACV – Used Car Ratings</td>
</tr>
<tr>
<td>Legislation</td>
<td>Appendix 2 – Legislation and industry codes</td>
</tr>
<tr>
<td>Stakeholders</td>
<td>Table 4: Roles and responsibilities</td>
</tr>
<tr>
<td>Risk Management</td>
<td>Appendix 3 – Risk management approach detailed explanation</td>
</tr>
<tr>
<td>Safety Maturity</td>
<td>NRSPP’s Thought Leadership Piece: Safety Maturity – A Measure of a Safety Culture</td>
</tr>
<tr>
<td></td>
<td>NRSPP’s Thought Leadership Piece: ‘Just Culture’ – The key to an effective safety culture</td>
</tr>
<tr>
<td>Ask Yourself?</td>
<td>Are there any external resources that I require?</td>
</tr>
</tbody>
</table>

5.6. **Overcoming barriers**

Overcoming barriers associated with policy development, implementation and *Grey Fleet* safety within your organisation can be difficult. An initial step involves identifying potential barriers that may exist and then establishing actions to overcome some or all of the barriers. Key responsibilities and actions can be allocated to staff and teams to translate into achievements.

Strategies to assist in overcoming barriers include:

- Raise awareness of *Grey Fleet* at the highest levels of your organisation so the responsibility has been defined and someone can be held accountable for its management.
- Consistently raise awareness and educate all members of the organisation on *Grey Fleet* risks, including duty of care.
- Effectively communicate why *Grey Fleet* management and reporting of risks and hazards is important, and
- Ensure *Grey Fleet* management is properly resourced to operate effectively.
5.7. **Staff education and training**

Education is pivotal to any effective Grey Fleet management policy. The education and training of workers in how to comply with the policy and improve safety is a key factor in improving the safety of your Grey Fleet operators. Without education, workers may not understand why compliance to the policy is important nor the safety risks they face if they do not comply.

An organisation’s education program should address the following as part of its training program:

- What is a Grey Fleet?
- The business work related road safety policy
- National and state legislation
- Strategies for work related travel and journey management: fleet vehicles, taxis/Uber, public transport and personal vehicles used in the Grey Fleet
- Consequences for violating company policy and legislation
- Vehicle safety ratings
- Vehicle maintenance and servicing
- Required insurance
- Journey management including knowledge of area, time of day, general feeling under fitness-to-drive, distance, frequency of use and what is expected of each party.

5.8. **Ongoing communication and consultation**

Ongoing communication and consultation with stakeholders is a crucial step for Grey Fleet safety management improvement, particularly to obtain support and psychological ownership of Grey Fleet safety risk management. In addition, ongoing communication provides an opportunity to obtain feedback and continuous improvement of processes. Finally, there are also legal obligations for organisations to consult with workers.

In establishing ongoing communication and consultation, organisations need to explore the various communications mechanisms and processes that are available within the organisation along with identifying how they can be utilised. Organisation structures and processes will differ and therefore the manner within which communication and consultation occurs needs to be tailored to fit the organisation. The following examples of communication that can be utilised will vary between organisations: tool box talks; team meetings; surveys; online feedback mechanisms, and incident reporting.
6. **Review monitoring and continuous improvement**

Organisations are constantly changing, so keeping current and part of the process is the challenge.

All too often within an organisational context, once a policy or framework has been implemented it can become increasingly easy to sit back and bask in what has been achieved.

In addition, it can be easy to jump to a conclusion that the journey is over and that Grey Fleet safety and risk has been adequately addressed, interventions have been developed and applied, and issues resolved. However, as illustrated in Figure 5, the highest maturity is based on continual improvement and sharing. Organisations should consider the following Grey Fleet issues as part of their implementation:

- That there is commitment to continue the safety process on the journey of continuous improvement to drive safety associated with Grey Fleet.
- The continuous improvement can be characterised by constantly reassessing the risks previously identified and monitoring and evaluating the success or deficiencies in the applied interventions and framework processes.
- The Grey Fleet safety process makes a commitment to continue on the journey of continuous improvement to safety associated with Grey Fleet (see section 4).
- Once Grey Fleet management systems have been established, an organisation needs to consider how they can continue to strengthen their management practices.

**Action: Ask yourself...**

- Are the previously identified risks associated with my Grey Fleet still the same?
- Have we introduced any additional risks as a result of any of our actions?
- By referring to Figure 5, what do we need to do to further advance our Grey Fleet safety maturity to the next stage?
- What resources and strategies are required to achieve our goals of progressing to the next stage in our safety maturity?
7. Appendices

7.1. Appendix 1 – Legislation and industry codes

7.1.1. Legislation – Codes of Practice – Case Law Reference Summary

Here is some legislation that may be relevant; it is up to the organisation to look at these in light of their own operations and how they may apply. The following table is not an exhaustive list; these are examples of legislation, standards that may apply to Grey Fleet. Other areas of consideration may be things like tax law. Sections 7.2.2-7.2.4 are example of a couple of piece of legislation with explanations as to why these are important. This is not a complete summary; investigations need to be done by individual organisations into what legislation is relevant to their locations and use of Grey Fleet.

<table>
<thead>
<tr>
<th>Legislation</th>
<th>Codes of Practice</th>
<th>Cases of Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Suncorp Insurance &amp; Finance v Workers Compensation Board of Queensland [1990] 1 Qd.R. 185;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Curtin Bros, (Qld) Pty Ltd v. FAI General Ins Co [1995] 1 Qd.R. 142;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>McEwan v. Gold Coast City Council [1987] 1 Qd.R. 337;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Brew v. WorkCover Queensland [2004] 1 Qd.R 621;</td>
</tr>
<tr>
<td>Work Health and Safety Regulation 2011</td>
<td>Australian Design Rules and Standards such as Motor Vehicle Standards Act 1989</td>
<td></td>
</tr>
</tbody>
</table>
### 7.1.2. National and State Law

<table>
<thead>
<tr>
<th>Federal/State</th>
<th>Name</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Federal</strong></td>
<td>Work Health and Safety Act 2011</td>
<td>The Work Health and Safety Act 2011 is a nationally consistent framework for securing the health and safety of workers and workplaces. It outlines the legislative obligations for all parties involved in all work processes to ensure all workers and other person’s health and safety are protected to the highest level. It outlines Risk Management duties requiring that risks are eliminated as far as practicable and if not practicable then to minimise the risk as much as is practicable. It also provides the requirements for reporting a notifiable event.</td>
</tr>
<tr>
<td></td>
<td>Work Health and Safety Regulation 2011</td>
<td>The Work Health and Safety Regulation 2011 outlines risk management and workplace management processes and activities that are now a requirement. It clearly distinguishes steps to identify, manage and systematically control risks. In comparison to older legislation, this legislation states that a person cannot conduct a risk assessment and determine that the risk is minimal and choose not to implement a mitigation measure, therefore even minimal risk must be addressed. This legislation has an increasing focus on work related road safety, especially with regard to organisational requirements to implement better risk management practices in a work vehicle and related driving activities. It outlines requirements for an organisation or undertaking to provide training and instruction into activities associated with the worker performing their role. This requirement means that organisations can no longer presume knowledge and capability but must now provide some training and instruction in their organisational risk management strategies to assess and mitigate risk.</td>
</tr>
<tr>
<td><strong>Victoria</strong></td>
<td>Occupational Health and Safety Act 2004</td>
<td>The Occupational Health and Safety Act 2004 outlines employers’ obligations in providing and maintaining a safe workplace. Under section 21 of the OHS Act, an employer has a duty and responsibility to provide and maintain so far as reasonably practicable a safe and healthy working environment for its workers. Under Section 25 of the OHS Act, workers also have a duty to cooperate with the measures developed to eliminate or reduce risks.</td>
</tr>
<tr>
<td></td>
<td>Road Safety Road Rules 2009</td>
<td>Road Safety Road Rules 2009 outlines the road rules with by workers within an organisation need to comply with when driving on roads within Victoria. The main objectives of the rules are: to provide road rules in Victoria that are substantially consistent with road rules elsewhere in Australia (based on the current version of the Australian Road Rules approved by the Australian Transport Council under the National Transport Commission Act 2003 of the Commonwealth); to establish rules to be observed by road users in Victoria in matters not otherwise dealt with in the Australian Road Rules; and to consolidate in a single instrument the road rules applying to Victoria.</td>
</tr>
<tr>
<td></td>
<td>Road Safety Act 1986</td>
<td>The Road Safety Act 1986 was generated to provide for safe, efficient and equitable road use; to set out the general obligations to road users regarding responsible road use; to improve safety and simplify procedures for the registration of motor vehicles and the licensing of drivers; to prevent the rebirthing of stolen vehicles; and to ensure equitable distribution in the community of the costs of road use.</td>
</tr>
</tbody>
</table>
|              | Other                                                     | • Transport Operations (Road Use Management Accreditation and Other Provisions) Regulation 2005  
• Road Safety Road Rules 2009  
• Road Safety (Vehicles) Regulations 2009  
• Road Safety (Drivers) Regulations 2009  
• Road Safety (General) Regulations 2009  
• Road Safety (Traffic Management) Regulations 2009 |
<table>
<thead>
<tr>
<th>State</th>
<th>Legislation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>New South Wales</strong></td>
<td>• Work Health and Safety Act 2011</td>
</tr>
<tr>
<td></td>
<td>• Work Health and Safety Regulation 2011</td>
</tr>
<tr>
<td></td>
<td>• Transport Legislation Amendment Act 2011</td>
</tr>
<tr>
<td></td>
<td>• Road Rules 2014</td>
</tr>
<tr>
<td></td>
<td>• Road Transport Act 2013</td>
</tr>
<tr>
<td></td>
<td>• Roads Act 1993</td>
</tr>
<tr>
<td></td>
<td>• Roads Regulation 2008</td>
</tr>
<tr>
<td></td>
<td>• Road Transport (Driver Licensing) Regulation 2008</td>
</tr>
<tr>
<td></td>
<td>• Road Transport (General) Regulation 2013</td>
</tr>
<tr>
<td></td>
<td>• Passenger Transport Regulation 2014</td>
</tr>
<tr>
<td></td>
<td>• Passenger Transport Act 2014 No 46</td>
</tr>
<tr>
<td></td>
<td>• Passenger Transport (Drug and Alcohol Testing) Regulation 2010</td>
</tr>
<tr>
<td><strong>Queensland</strong></td>
<td>• Work Health and Safety Act 2011</td>
</tr>
<tr>
<td></td>
<td>• Work Health and Safety Regulation 2011</td>
</tr>
<tr>
<td></td>
<td>• Transport Operations (Passenger Transport) Act 1994</td>
</tr>
<tr>
<td></td>
<td>• Transport Operations (Road Use Management) Act 1995</td>
</tr>
<tr>
<td></td>
<td>• Transport Operations (Road Use Management—Road Rules) Regulation 2009</td>
</tr>
<tr>
<td><strong>South Australia</strong></td>
<td>• Work Health and Safety Act 2012</td>
</tr>
<tr>
<td></td>
<td>• Work Health and Safety Regulations 2012</td>
</tr>
<tr>
<td></td>
<td>• Road Traffic (Miscellaneous) Regulations 2014</td>
</tr>
<tr>
<td></td>
<td>• Road Traffic (Light Vehicle Standards) Rules 2013</td>
</tr>
<tr>
<td></td>
<td>• Road Traffic (Road Rules—Ancillary and Miscellaneous Provisions) Regulations 2014</td>
</tr>
<tr>
<td></td>
<td>• Motor Vehicles Regulations 2010</td>
</tr>
<tr>
<td><strong>Western Australia</strong></td>
<td>• Work Health and Safety Bill 2014</td>
</tr>
<tr>
<td></td>
<td>• Occupational Safety and Health Act 1984</td>
</tr>
<tr>
<td></td>
<td>• Occupational Safety and Health Regulations 1996</td>
</tr>
<tr>
<td></td>
<td>• Transport Co-ordination Act 1966</td>
</tr>
<tr>
<td></td>
<td>• Road Traffic (Vehicles) Act 2012</td>
</tr>
<tr>
<td></td>
<td>• Road Traffic (Vehicle Standards) Regulations 2002</td>
</tr>
<tr>
<td></td>
<td>• Road Traffic (Vehicle Licensing) (Taxing) Act 2001</td>
</tr>
<tr>
<td></td>
<td>• Metropolitan (Perth) Passenger Transport Trust Act 1957</td>
</tr>
<tr>
<td><strong>Northern Territory</strong></td>
<td>• Work Health and Safety Act 2011</td>
</tr>
<tr>
<td></td>
<td>• Work Health and Safety Regulation 2011</td>
</tr>
<tr>
<td></td>
<td>• Commercial Passenger (Road) Transport Act 2014</td>
</tr>
<tr>
<td></td>
<td>• Control Of Roads (Infringement Notice) Regulations 2011</td>
</tr>
<tr>
<td></td>
<td>• Control Of Roads Act 2015</td>
</tr>
</tbody>
</table>
### 7.1.3. Regulations for transport use

<table>
<thead>
<tr>
<th>Name</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Codes of Practice</strong></td>
<td></td>
</tr>
<tr>
<td>Australian Design Rules and Standards such as motor Vehicle Standards Act 1989</td>
<td>The Australian Design Rules (ADRs) are national standards for vehicle safety, anti-theft and emissions. The ADRs are generally performance based and cover issues such as occupant protection, structures, lighting, noise, engine exhaust emissions, braking and a range of miscellaneous items. These are based on UNECE regulations.</td>
</tr>
<tr>
<td>ISO 39001: 2012 Road Traffic Safety Management Systems – Requirements With Guidance for Use</td>
<td>ISO 39001: 2012 provides a specific tool to help organisations better manage activities that relate to road traffic crashes. It outlines requirements for organisations in developing and implementing road safety policy, developing road traffic safety objectives and action plans that outline how objectives can be achieved. It also outlines requirements for the continuous improvement or organisational processes relating to road traffic safety. This code of practice defines the requirements for organisations to identify the performance factors used to assess outcomes (Wishart, 2015).</td>
</tr>
</tbody>
</table>

### 7.1.4. Australian standards for risk management

<table>
<thead>
<tr>
<th>Name</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Codes of Practice</strong></td>
<td></td>
</tr>
<tr>
<td>AS/NZS ISO 31000: 2009 Risk Management Principles and Guidelines</td>
<td>AS/NZS ISO 31000: 2009 outlines the principles that need to be satisfied to achieve the minimum acceptable requirements for risk management. This code of practice recommends that organisations should have a framework that integrates many risk management processes into all facets of the organisation. It also outlines key risk management concepts in relation to road safety. This code of practice outlines the minimum requirements for the proactive management of risk in regards to work vehicle use. Its implementation now makes it unacceptable for vehicle operators not to know the risk management processes associated with road safety (Wishart, 2015).</td>
</tr>
</tbody>
</table>
7.2. **Appendix 2 – Risk management approach detailed explanation**

7.2.1. **Hazard identification**

Within the context of *Grey Fleet*, there is a variety of potential hazards that could include:

- Driving while distracted
- Vehicles not fit for purpose
- Poor maintenance
- Lack of training and education
- Low safety ratings of vehicle
- Lack of vehicle monitoring or use of technology systems to assist (higher maturity organisations may utilise in-vehicle-monitoring systems)
- Management challenges
- Speeding, harsh braking
- No journey planning or related fatigue management systems, and
- Parking infringements.

Undertake a similar hazard identification process within your own *Grey Fleet*.

7.2.2. **Risk identification**

There are a number of potential risks associated with each of the hazards identified. Consider the example below of the hazard of driving while distracted.

---

**Action: Consider the example: driving while distracted**

Driver distraction is one of the main contributing factors in crashes with research identifying distraction as a contributing factor in 22% of car crashes and near crashes (Klauer *et al.*, 2008) and 71% of truck crashes (and 46% of near crashes) in naturalistic driving studies (Olson *et al.*, 2009). Consequently, in relation to risk identification, the potential risk of being involved in a crash due to being distracted is quite high, and the evidence indicates the consequences are quite severe. Within our *Grey Fleet* area, we can consider that driving while distracted has the potential to be considered a relevant hazard and a potential risk.
7.2.3. **Risk assessment and evaluation**

While a risk assessment process can identify the potential risks and likely consequences, a risk assessment and evaluation can be utilised to determine the likelihood of such an occurrence. For example, while a crash can have the potential for severe injury or even death, what is the likelihood of such a crash resulting from each hazard and risk previously identified? To help, it is recommended a risk assessment tool be utilised to evaluate and determine the level of risk associated with each hazard and risk.

Let’s reconsider our driving while distracted example. Within the *Grey Fleet* context, drivers may experience distraction from personal or business mobile phones, personal related issues, and the operational environment and circumstances. The use of the risk assessment tool can highlight that the consequences and likelihood of driving while distracted are considerable. As a result, we may need to consider our risk mitigation strategies.

Below is an example of a generic risk matrix that can be adapted to *Grey Fleet*; for specific *Grey Fleet* examples of Risk Management Matrices, see Appendix 4.

**Table 7: Generic risk management matrix to be adapted to Grey Fleet**

<table>
<thead>
<tr>
<th>Hazard Category</th>
<th>Identify the Hazards</th>
<th>Calculate the Initial Risk</th>
<th>Control (Treat) the Risks</th>
<th>Calculate the Residual Risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>General type?</td>
<td>What could cause harm?</td>
<td>Consequence (C)</td>
<td>Likelihood (L)</td>
<td>Risk (R)</td>
</tr>
<tr>
<td>General type?</td>
<td>What could go wrong?</td>
<td>C</td>
<td>L</td>
<td>R</td>
</tr>
</tbody>
</table>
7.2.4. **Risk Mitigation and treatment**

The next step in the risk management process relates to undertaking various activities and implementing initiatives to reduce Grey Fleet risk.

In our driving while distracted example, we could apply the following examples of strategies:

- Leadership – people in leadership roles play a pivotal role in creating and changing the culture of an organisation.
- Education – education provides employees with an understanding of the reasoning behind a policy.
- Training – a training program will ensure employees are aware of and able to adhere to correct practices.
- Collection, monitoring and analysis of critical incident data – critical incident data should be used to help determine if risk management policies are working.
- Enforcement – penalties to adhere to the risk management policy should be documented within the policy.

What strategies and initiatives can you and your organisation consider to develop and implement to mitigate the risks for each of the hazards and risks identified and evaluated?
7.2.5. **Risk monitoring**

On implementing various strategies within our *Grey Fleet*, we will need to further consider consistent monitoring to determine the success or otherwise of risk mitigation strategies. To remain effective, a risk management program will require constant and consistent monitoring.

In our driving while distracted example, we will need to adopt various processes to be able to monitor consistently the various mitigation strategies employed. For example, the following processes are outlined in the NRSPP’s guide to developing an effective policy for mobile phone use in vehicles to collect, monitor and analyse incident data:

- Organisation accident reporting forms could record information on mobile phone tasks/activities performed by drivers at the time of a crash (e.g. talking on the phone, dialling a number).
- Organisation mobile phone bill records could be correlated with accident records where possible (e.g. time of crash), subject to privacy, to determine whether a mobile phone was being used at the time of a crash or incident.
- A survey could be administered on a regular basis to track and quantify worker mobile phone use in the vehicle.
- A no-blame confidential incident reporting system could be developed which records, at regular intervals, incidents and near misses attributable to mobile phone use. For more information see the [NRSPP’s Thought Leadership Piece on ‘Just Culture’ – The key to an effective safety culture](#).
- Provision could be made for the assessment of mobile phone use as a risk factor in driver and vehicle audit forms.
- Consider using electronic data logging devices that are capable of recording whether mobile phones are in use in crashes and near misses involving the organisation’s vehicles.
- Public reports of unsafe behaviour, which may or may not have resulted in a near miss or incident.
- Other relevant sources of data on the role of mobile phones in accidents and incidents involving an organisation’s workers can also be collected.
- A system for storing, coding, analysing, monitoring and reporting data on mobile phone-related crashes and incidents could be established.

7.2.6. **Roles and responsibilities**

Depending on the structure and size of the organisation various people and positions within each organisation will have responsibilities associated with *Grey Fleet* and the hazard identification and risk management process. These people are the stakeholders within *Grey Fleet*, outlined in section 2.2. In our driving while distracted example, key roles and responsibilities of certain stakeholders from *Table 4: Roles and responsibilities* can be adapted to the management of the driver distraction risk.
### Appendix 3 – Grey Fleet risk matrices

#### Table 8: Risk Matrix for Grey Fleet

<table>
<thead>
<tr>
<th>Hazard Category</th>
<th>Identifying the Hazards</th>
<th>Calculate the Risk</th>
<th>Control (treat) the Risks</th>
<th>Revised Risk Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hazard</td>
<td>What could happen</td>
<td>C</td>
<td>L</td>
<td>R</td>
</tr>
</tbody>
</table>
| Unroadworthy vehicle | Mechanical defect contributes to vehicle crash | Major | Possible | High | • Vehicle serviced in accordance with dealer recommendations  
• Pre-start maintenance checks by driver  
• Sign off on pre-start checklist | | | | • Implement policy and procedures regarding regular servicing  
• Provide pre-start checklist  
• Educate drivers about pre-start checklist  
• Conduct information sessions to educate about pre-start checks  
• Conduct pre-start checklist audits |
| Unlicensed driver | Driver driving on organisational business illegally | Major | Possible | High | • Do not drive  
• Ensure licence current  
• Notify organisation if loss of licence occurs | | | | • Educate drivers on policy and legal implications  
• Implement licence history checks annually  
• Implement statutory declaration conditions |
| Extreme weather event | Get caught in floods | Major | Possible | High | • Prepare journey plan, monitor weather  
• Make other transport arrangements  
• Don't drive  
• If it's flooded, forget it | | | | • Extreme weather policy and safe procedures  
• Support drivers not driving  
• Educate drivers about flood consequences |
| Insurance and policy level | Driver does not have insurance for the vehicle or does not have a policy that covers driving for work purposes | Major | Possible | High | • Ensure vehicle is insured  
• Ensure insurance company is aware the vehicle is being used for work purposes | | | | • Add insurance policy checks into employee KPIs  
• Ensure insurance policies are checked annually  
• Ensure all insurance policies cover work purposes |
Table 9: Consequences of risks description

<table>
<thead>
<tr>
<th>Category</th>
<th>Insignificant</th>
<th>Minor</th>
<th>Moderate</th>
<th>Major</th>
<th>Catastrophic</th>
</tr>
</thead>
<tbody>
<tr>
<td>Human Injury</td>
<td>No injuries</td>
<td>Medical treatment</td>
<td>Disabling injury</td>
<td>Fatality</td>
<td>Multiple fatalities</td>
</tr>
<tr>
<td>Financial Loss</td>
<td>Minor scratch</td>
<td>Vehicle damaged and requires repairs</td>
<td>Vehicle requires towing and major repairs</td>
<td>Vehicle written off</td>
<td>Multiple vehicles or infrastructure</td>
</tr>
<tr>
<td>Reputation/Work/Income</td>
<td>No effect on work production</td>
<td>Slight production loss</td>
<td>Significant disruption to productivity, many stakeholders required</td>
<td>Major disruption to operations</td>
<td>Operations cease/ excessive media attention</td>
</tr>
<tr>
<td>Environment</td>
<td>Negligible environmental impact</td>
<td>Minor environmental damage</td>
<td>Significant environmental damage</td>
<td>Major environmental damage</td>
<td>Extensive environmental damage</td>
</tr>
</tbody>
</table>

Table 10: Likelihood of risks description

<table>
<thead>
<tr>
<th>Likelihood</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Almost certain/frequent</td>
<td>Expected to occur in most circumstances, or often in the life of the driving activity</td>
</tr>
<tr>
<td>Likely</td>
<td>Probably occur in most circumstances but unlikely to occur often in the life of the driving activity</td>
</tr>
<tr>
<td>Possible</td>
<td>Might occur at some time, unlikely to occur to every vehicle or driving situation but may occur to a few vehicles or situations</td>
</tr>
<tr>
<td>Unlikely/remote</td>
<td>Unlikely to occur but should be considered as possible</td>
</tr>
<tr>
<td>Rare/improbable</td>
<td>So extremely remote that it should not be considered as possible unless exceptional</td>
</tr>
</tbody>
</table>

Table 11: How risk level is chosen through combining likelihood and consequence

<table>
<thead>
<tr>
<th>Description</th>
<th>Insignificant</th>
<th>Minor</th>
<th>Moderate</th>
<th>Major</th>
<th>Catastrophic</th>
</tr>
</thead>
<tbody>
<tr>
<td>Almost certain/frequent</td>
<td>High</td>
<td>High</td>
<td>Extreme</td>
<td>Extreme</td>
<td>Extreme</td>
</tr>
<tr>
<td>Likely</td>
<td>Medium</td>
<td>High</td>
<td>High</td>
<td>Extreme</td>
<td>Extreme</td>
</tr>
<tr>
<td>Possible</td>
<td>Low</td>
<td>Medium</td>
<td>High</td>
<td>High</td>
<td>Extreme</td>
</tr>
<tr>
<td>Unlikely/remote</td>
<td>Low</td>
<td>Low</td>
<td>Medium</td>
<td>High</td>
<td>Extreme</td>
</tr>
<tr>
<td>Rare/improbable</td>
<td>Low</td>
<td>Low</td>
<td>Medium</td>
<td>High</td>
<td>High</td>
</tr>
</tbody>
</table>
### 7.3.1 Combining risk management and safety maturity

As safety maturity in an organisation increases from emerging through to continually improving, many of the risks involved in the *Grey Fleet* will decrease as well. The risk will vary depending on frequency of *Grey Fleet* travel, regular driving and other contributing factors. This is shown in the table below.

<table>
<thead>
<tr>
<th>Risks</th>
<th>Emerging</th>
<th>Managing</th>
<th>Involving</th>
<th>Cooperating</th>
<th>Continually Improving</th>
<th>What causes the change?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>General</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unroadworthy Vehicle</td>
<td>High</td>
<td>Medium</td>
<td>Low</td>
<td>Low</td>
<td>Low</td>
<td>As safety maturity increases employees will become more aware of the importance of having a roadworthy vehicle, and thus the likelihood of an employee having an unroadworthy vehicle is severely decreased.</td>
</tr>
<tr>
<td>Unlicensed Driver</td>
<td>High</td>
<td>Medium</td>
<td>Low</td>
<td>Low</td>
<td>Low</td>
<td>As safety maturity increases so will the understanding of the importance of having a valid and correct driver’s licence for the driving task being undertaken.</td>
</tr>
<tr>
<td>Extreme Weather Event</td>
<td>Extreme</td>
<td>High</td>
<td>High</td>
<td>Medium</td>
<td>Medium</td>
<td>As safety maturity increases so will the employee’s ability to manage their driving in an extreme weather event. That said, there is only so much driving skills can do in the event of extreme weather.</td>
</tr>
<tr>
<td>Insurance and Policy Level</td>
<td>High</td>
<td>High</td>
<td>Medium</td>
<td>Low</td>
<td>Low</td>
<td>As safety maturity increase so will the understanding of the importance of being insured and having the correct insurance policy.</td>
</tr>
<tr>
<td>Age of Vehicle</td>
<td>Extreme</td>
<td>High</td>
<td>Medium</td>
<td>Low</td>
<td>Low</td>
<td>As safety maturity within the organisation increases the risk of employees using inappropriately aged cars will decrease because of the implementation of standards and policies within the organisation.</td>
</tr>
<tr>
<td>ANCAP Rating of Vehicle</td>
<td>Extreme</td>
<td>High</td>
<td>Medium</td>
<td>Low</td>
<td>Low</td>
<td>As safety maturity within the organisation increases the risk of employees using a low ANCAP rated vehicle will decrease because of the implementation of standards and policies within the organisation.</td>
</tr>
<tr>
<td>Young/Inexperienced/Probationary Driver</td>
<td>Extreme</td>
<td>High</td>
<td>High</td>
<td>High</td>
<td>High</td>
<td>A young driver has little to no skill in driving alone in all conditions, therefore even as safety maturity increases within the organisation the risk is still high for young drivers.</td>
</tr>
<tr>
<td>Driving on Urban Roads</td>
<td>Extreme</td>
<td>High</td>
<td>High</td>
<td>High</td>
<td>High</td>
<td>A young or probationary driver is more likely to have a cheaper level of insurance, they likely won’t have driving for work cover or comprehensive insurance. The risk decreases with safety maturity because the organisation there will have checks and policies in place.</td>
</tr>
<tr>
<td>Driving on Rural Roads</td>
<td>Extreme</td>
<td>High</td>
<td>High</td>
<td>High</td>
<td>High</td>
<td>Due to the cost associated with new and 5 star ANCAP rated vehicles, young drivers have a high risk of driving old and unsafe vehicles.</td>
</tr>
<tr>
<td>Mature/ Experienced Driver</td>
<td>Driving on Urban Roads</td>
<td>Driving on Rural Roads</td>
<td>Driving Skill in Extreme weather</td>
<td>Insurance Policy of Vehicle</td>
<td>Vehicle Age and Safety Rating</td>
<td></td>
</tr>
<tr>
<td>----------------------------</td>
<td>------------------------</td>
<td>------------------------</td>
<td>---------------------------------</td>
<td>-----------------------------</td>
<td>-----------------------------</td>
<td></td>
</tr>
<tr>
<td></td>
<td>High</td>
<td>Medium</td>
<td>Medium</td>
<td>Low</td>
<td>Low</td>
<td></td>
</tr>
<tr>
<td></td>
<td>As a mature/experienced driver has been driving for many years and would be financially stable enough to have an appropriate vehicle and appropriate insurance, their risk decreases as safety maturity of the organisation increases.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Elderly Driver</th>
<th>Driving on Urban Roads</th>
<th>Driving on Rural Roads</th>
<th>Driving Skill in Extreme weather</th>
<th>Insurance Policy of Vehicle</th>
<th>Vehicle Age and Safety Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>High</td>
<td>High</td>
<td>Medium</td>
<td>Medium</td>
<td>Medium</td>
</tr>
<tr>
<td></td>
<td>As driver age increases into the elderly bracket driving skill decreases. This means that even with an increased safety maturity the driver still remains at a medium risk if they are within the elderly category. Elderly people are also more likely to hold onto older cars because they are more familiar with them.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Driving Is Infrequent – Average Driver Whose Personal Insurance Is Sufficient For Driving</th>
<th>Driving on Urban Roads</th>
<th>Driving on Rural Roads</th>
<th>Driving Skill in Extreme weather</th>
<th>Insurance Policy of Vehicle</th>
<th>Vehicle Age and Safety Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Extreme</td>
<td>High</td>
<td>High</td>
<td>Medium</td>
<td>Medium</td>
</tr>
<tr>
<td></td>
<td>When driving for work is a rarity, and if there is low safety maturity within an organisation, the risks are extreme in each category. This is due to lack of driver education and training, knowledge of the risks involved and how to manage them.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Driving Is The Norm For 10% – Average Driver – More Frequent</th>
<th>Driving on Urban Roads</th>
<th>Driving on Rural Roads</th>
<th>Driving Skill in Extreme weather</th>
<th>Insurance Policy of Vehicle</th>
<th>Vehicle Age and Safety Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>High</td>
<td>High</td>
<td>Medium</td>
<td>Medium</td>
<td>Medium</td>
</tr>
<tr>
<td></td>
<td>When driving occurs 10% of the time in an organisation, the risk is less extreme than that of when driving is a rarity. The risk is still extreme for extreme weather because these drivers would not be experienced at driving in adverse conditions.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Driving Is The Norm For 30% – Regular User</th>
<th>Driving on Urban Roads</th>
<th>Driving on Rural Roads</th>
<th>Driving Skill in Extreme weather</th>
<th>Insurance Policy of Vehicle</th>
<th>Vehicle Age and Safety Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>High</td>
<td>High</td>
<td>Medium</td>
<td>Medium</td>
<td>Low</td>
</tr>
</tbody>
</table>

Grey Fleet Safety Management Guide
<table>
<thead>
<tr>
<th>Driving on Urban Roads</th>
<th>High</th>
<th>Medium</th>
<th>Medium</th>
<th>Medium</th>
<th>Medium</th>
<th>When driving is the norm 30% of the time, there is still a medium risk at the continually improving stage as drivers may still not have experience handling several different kinds of environments and situations.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Driving on Rural Roads</td>
<td>High</td>
<td>Medium</td>
<td>Medium</td>
<td>Medium</td>
<td>Medium</td>
<td>Proudly managed by</td>
</tr>
<tr>
<td>Driving Skill in Extreme weather</td>
<td>High</td>
<td>Medium</td>
<td>Medium</td>
<td>Medium</td>
<td>Medium</td>
<td>Premium members of the organisation</td>
</tr>
<tr>
<td>Insurance Policy of Vehicle</td>
<td>High</td>
<td>Medium</td>
<td>Medium</td>
<td>Low</td>
<td>Low</td>
<td>For reference, the following terms are used in the table:</td>
</tr>
<tr>
<td>Vehicle Age and Safety Rating</td>
<td>High</td>
<td>Medium</td>
<td>Medium</td>
<td>Low</td>
<td>Low</td>
<td>• Emerging: There are adequate safety systems in place but due to a lack of safety culture and poor prioritising of work driving safety, poor safety behaviours cause incidents. Safety is defined as aiming for adherence to the regulations and incidents are seen as unavoidable</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• Managing: Safety is defined as adherence to the rules and regulations, policies and procedures. Incidents are seen as deviations from the rules and viewed as preventable. Action is reactionary and only occurs after an incident.</td>
</tr>
<tr>
<td>Driving Is The Norm For 50% Plus – Heavy User</td>
<td>High</td>
<td>Medium</td>
<td>Medium</td>
<td>Medium</td>
<td>Low</td>
<td>For reference, the following terms are used in the table:</td>
</tr>
<tr>
<td>Driving on Urban Roads</td>
<td>High</td>
<td>Medium</td>
<td>Medium</td>
<td>Medium</td>
<td>Low</td>
<td>• Involving: Safety begins to move away from a top-down approach. The employees are willing to work with management to improve the safety of the organisation. Most employees take responsibility for their own safety.</td>
</tr>
<tr>
<td>Driving on Rural Roads</td>
<td>High</td>
<td>Medium</td>
<td>Medium</td>
<td>Medium</td>
<td>Low</td>
<td>• Cooperating: Employees recognise that management decisions can influence safety. Employees accept responsibility for the safety of themselves and others. Through the reporting of near misses, incidents can be prevented proactively.</td>
</tr>
<tr>
<td>Driving Skill in Extreme weather</td>
<td>High</td>
<td>Medium</td>
<td>Medium</td>
<td>Medium</td>
<td>Low</td>
<td>• Continually Improving: All members of the organisation actively participate in the management of safety and prevention of all injuries is a core value of the organisation. The organisation has not had an incident recently and strives for continuing improvement.</td>
</tr>
<tr>
<td>Insurance Policy of Vehicle</td>
<td>High</td>
<td>Medium</td>
<td>Medium</td>
<td>Low</td>
<td>Low</td>
<td>For reference, the following terms are used in the table:</td>
</tr>
<tr>
<td>Vehicle Age and Safety Rating</td>
<td>High</td>
<td>Medium</td>
<td>Medium</td>
<td>Low</td>
<td>Low</td>
<td>• Emerging: There are adequate safety systems in place but due to a lack of safety culture and poor prioritising of work driving safety, poor safety behaviours cause incidents. Safety is defined as aiming for adherence to the regulations and incidents are seen as unavoidable</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• Managing: Safety is defined as adherence to the rules and regulations, policies and procedures. Incidents are seen as deviations from the rules and viewed as preventable. Action is reactionary and only occurs after an incident.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• Involving: Safety begins to move away from a top-down approach. The employees are willing to work with management to improve the safety of the organisation. Most employees take responsibility for their own safety.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• Cooperating: Employees recognise that management decisions can influence safety. Employees accept responsibility for the safety of themselves and others. Through the reporting of near misses, incidents can be prevented proactively.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• Continually Improving: All members of the organisation actively participate in the management of safety and prevention of all injuries is a core value of the organisation. The organisation has not had an incident recently and strives for continuing improvement.</td>
</tr>
</tbody>
</table>
7.4. Appendix 4 – Pre-start checklists

Why should I undertake a pre-start check before driving my personal vehicle as part of the Grey Fleet? A pre-start safety check can help to ensure a vehicle is safe to use, ensuring the safety of the driver. A pre-start safety check also helps to protect the liability of all parties in the event of an incident involving Grey Fleet. This checklist can be provided to assist in proving that the vehicle was safe to use for work purposes.

The following is a list of vehicle elements in the Daily Pre-Start Checklist which are to be checked daily before the beginning of a drive, these are to be checked off and signed within your Vehicle Daily/Weekly Inspection Log (on reverse). On the reverse of this sheet is the Weekly Checks and Vehicle Daily/Weekly Inspection Log that should be checked off and submitted to the direct supervisor as often as its name suggests, ensuring that the daily checks are being undertaken, and being undertaken correctly. These checklists are exhaustive and are provided as suggestions for what could be included in your organisation's checklists, use these as guides, and tailor the pre-start checks to the requirements of your organisation. Furthermore, ensure that all workers are educated in how to undertake the specific checks that you will be requiring.

**Daily Pre-Start Checklist**

<table>
<thead>
<tr>
<th>Visual Inspection</th>
<th>Pre-Drive/Operational Checks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Checked tyres are in good condition (with adequate tread depth and undamaged side walls) and tyre pressures are maintained regularly at correct level based on user manual</td>
<td>Ensure all lights (headlights, reversing lights and brake lights) and indicators are working</td>
</tr>
<tr>
<td>Checked for evidence of fluid leaks underneath the vehicle (oil, water, etc.)</td>
<td>Ensure horn and audible alarms are working</td>
</tr>
<tr>
<td>Checked for good visibility</td>
<td>Ensure seatbelts are operational and free of damage</td>
</tr>
<tr>
<td>No damage to lights, windows, mirrors, windscreen free from chips, cracks, dirt</td>
<td>Ensure wipers, washers and air-con are working efficiently</td>
</tr>
<tr>
<td>Checked for panel damage, loose fittings, dents, scratches, etc.</td>
<td>Test the handbrake to ensure it ‘holds’ the car on steep hills</td>
</tr>
<tr>
<td>Is PPE required? (such as high-visibility vests)</td>
<td>Are there any obvious warning lights on?</td>
</tr>
<tr>
<td></td>
<td>Are there any unusual noises coming from brakes, steering, transmission, etc.</td>
</tr>
<tr>
<td></td>
<td>Ensure a minimum ¼ tank of fuel</td>
</tr>
<tr>
<td></td>
<td>Ensure all registration and insurance paperwork is present in the vehicle</td>
</tr>
<tr>
<td></td>
<td>Ensure bump card or post-crash emergency contact information is present and easily accessible</td>
</tr>
</tbody>
</table>
Vehicle Daily/Weekly Inspection Log

Name: ______________________________  Week Commencing: _______ (Date)___________

Make: ____________________ Model: ________________ Registration number: ________________

<table>
<thead>
<tr>
<th>Day</th>
<th>Date</th>
<th>Visual Inspection</th>
<th>Pre-Drive/Operation Checks</th>
<th>Signature</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monday</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tuesday</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wednesday</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thursday</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Friday</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

In the weekly checks, the type of checks undertaken should be specific to the age of the vehicle. For example, checking oil and coolant levels in a newer car is less important as the warning lights are reliable, where as in an older vehicle, these will need to be checked regularly. It is important that when developing your organisation’s pre-start checklists that you decide what you are going to define as a newer and older vehicle.

Ensure that you tailor your checklists to the type of vehicles being driven in your Grey Fleet.

Weekly Checks
(ADD NOTES WHERE NECESSARY)

<table>
<thead>
<tr>
<th>Checked – and Additional Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>All fluid levels checked (oil, coolant, etc.)</td>
</tr>
<tr>
<td>Battery levels and terminals checked (if applicable and accessible)</td>
</tr>
<tr>
<td>Correct tyre pressure based on user manual</td>
</tr>
<tr>
<td>Spare tyres checked (pressure and conditions)</td>
</tr>
<tr>
<td>Presence of tool kit (if applicable)</td>
</tr>
<tr>
<td>Vehicle keys are correctly tagged</td>
</tr>
<tr>
<td>Insurance information, bump card, registration information, log book, paperwork, etc. is in glovebox</td>
</tr>
<tr>
<td>Ancillary equipment working correctly (radio, GPS, etc.)</td>
</tr>
<tr>
<td>General cleanliness of vehicle maintained (vacuumed and washed)</td>
</tr>
</tbody>
</table>

Is the vehicle due for a service? Yes  No

Is there any previous aesthetic damage to the vehicle? If so, please list

Were there any faults found with the vehicle when undertaking pre-start check? If so, please list.
7.5. Appendix 5 – Policy Template

This is a structured framework, which can be used to assist in developing a Grey Fleet policy specific to your organisation. It is to be taken as a guide that is adaptable, not a direct policy to be immediately used in practice.

Variables will need to be taken into consideration when using a template such as this one. For example, as the use of Grey Fleet increases, so does risk, and therefore the controls you have in place need to take into account increasing risk levels at increasing Grey Fleet use. The policy may wish to include tiers such that it is not onerous for infrequent users but reflects greater engagement for higher users.

- Step 1: Assess your safety maturity level using Figure 5: Safety maturity curve for Grey Fleet management
- Step 2: Using this safety maturity level assess your risk using in Appendix 7.4.1: Combining risk management and safety maturity.
- Step 3: Tailor your Grey Fleet policy to each risk level you have identified in your organisation.

This means you will not have a policy that is on size fits all, there may be different requirements for different groups in your organisation based on driving experience, regularity of driving, driving conditions, etc. It is up to you to decide how to best tailor this policy template to your organisation.

<table>
<thead>
<tr>
<th>Policy Title:</th>
<th>Grey Fleet Driver Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Level:</td>
<td>i.e. High Risk, Medium Risk, Low Risk</td>
</tr>
<tr>
<td>Policy Date:</td>
<td></td>
</tr>
<tr>
<td>Policy Category:</td>
<td></td>
</tr>
<tr>
<td>Reference Number:</td>
<td></td>
</tr>
</tbody>
</table>

1. Terms

This policy is effective from (Date).
XXXX will periodically review this Policy and reserves the right to alter it at any time.

This policy must be read in conjunction with this organisation’s Grey Fleet Operations Manual as these two elements work together in an effort to manage Grey Fleet (development of such a manual can be undertaken through the use of this Grey Fleet guide).

2. Policy statement

Here you will outline the purpose of this policy, and why, as an organisation, you have decided to implement it. Please see an example below.

XXXX is responsible for the health and safety of its employees whilst at their place of work. Any vehicle in which an employee carries out business on behalf of XXXX or their employer is regarded as a place of work and is therefore subject to the current
legislation. It follows that XXXX is required to carry out an assessment of the risks to the health and safety of its employees, while they are at work, and to other people who may be affected by their work activities.

3. **Policy Scope**

Here you will outline what and whom this policy will cover. Please see an example below. For further clarification, see section 1: Identifying Grey Fleet.

This policy applies to all employee who are operating vehicles within XXXX’s Grey Fleet. A Grey Fleet Vehicle is any vehicle used for work not directly provided by the organisation that employs the driver. In this guide, Grey Fleet includes personal vehicles, all forms of leases and client vehicles. Grey Fleet applies whether workers are reimbursed for expenses associated with work use or not, such as kilometres travelled. This policy only overs light vehicles as Grey Fleet vehicles and therefore, motorcycles, goods carrying vehicles and machinery are not to be used within the Grey Fleet.

4. **Responsibilities**

The following table is a summary of how to briefly present roles and responsibilities in managing Grey Fleet, which are specified in the policy. The table only provides two examples, for more information and detail please see Table 4: Roles and responsibilities in section 2.2 Who are the stakeholders?

<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Responsibility and Delegation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Executive Officer/</td>
<td>To develop and maintain the policy, and ensuring compliance to the policy</td>
</tr>
<tr>
<td>Fleet Manager/Direct Manager</td>
<td></td>
</tr>
<tr>
<td>Drivers/Vehicle Owners</td>
<td>To comply with the requirements of this policy and procedure</td>
</tr>
</tbody>
</table>

5. **Grey Fleet Users**

In this section you will outline the requirements that the Grey Fleet drivers (employees) need to comply with in order to not be in breach of this company policy. Under each subheading is an example of how this could be written within your organisation’s policy. For more information, see section 3.4: The driver’s responsibilities in vehicle safety.

5.1 **Use of Private Vehicles for Business Use in the Grey Fleet**

Employees who drive their private vehicle for work purposes within the Grey Fleet will be reimbursed for business usage in line with the approved kilometre allowance payments. This provision must only be used when a pool car or daily rental car is not available or where the employees position requires the use of a personal vehicle. A new vehicle form must be submitted annually or whenever the vehicle is replaced or a different personal vehicle is used. Daily/Weekly pre-start checklists must be undertaken before each journey and must be submitted to the line manager at the end of every working week. For more information, see Appendix 5 – Pre-start checklists.

5.2 **Requirements for providing a suitable vehicle**

Here you will outline briefly the requirements for a suitable vehicle within your organisation’s Grey Fleet. Below is an example of how this could be detailed. For more information on what these requirements should be, see section 3.3: Vehicle safety.
Any vehicle being driven within the Grey Fleet undertaking tasks for the organisation must be suitable for its intended use; and be fully maintained (in line with the vehicles manufacturers recommendations), in a roadworthy condition and meet all legal requirements.

5.3 Driver’s licence checks

Here you will outline how you will ensure that the employees driving within the Grey Fleet have a valid driver’s licence, and are currently legally able to drive. This can be done by including having a valid driver’s licence within an employee’s KPI’s and identifying specifically the frequency of checking and how this is conducted. For more information see section 3.2: How can an organisation help? Which details how licencing and driving history can be checked. Below is an example of how this could be detailed.

All employees who drive on business will be required to undergo annual driving licence checks to ensure the employee has a full and valid driving licence for the category of vehicle they are required to drive on business, as part of their KPIs. Employees with more than six demerit points or more on their licence are required to have their licences checked more frequently (how frequently is at the discretion of your organisation).

By signing the Grey Fleet driver acknowledgment (Appendix 7.7: Grey Fleet Driver Declaration) the driver accepts that XXX may, at their discretion, check the licence for currency. Staff and volunteers are required to advise their line manager in the event their licence is suspended or has special conditions imposed on it (i.e. cancellation or loss of the licence). Where a driver has been disqualified from driving their employment may be reviewed if the conditions of the staff member’s employment require them to drive a vehicle.

5.4 Insurance

It is of the upmost importance to include vehicle insurance in your Grey Fleet Policy. This means that the employees must comply with the policy by obtaining the correct level of comprehensive insurance cover for their vehicle (i.e. one that includes driving for work). For more information on insurance, see section 3.4.3: Insurance.

All employees using their personal/private vehicle for work purposes must ensure they have informed their insurance company that they will be using their vehicle for work purposes. All employees must maintain a comprehensive level of vehicle insurance. Within this comprehensive vehicle insurance, it should be insured that breakdown, and roadside assistance are covered, or that a separate roadside assistance policy is in place.

5.5 Driving offences and fines

Ensure that within your policy you clearly outline that drivers abide by the specific laws for the state they are driving. This includes the use of mobile phones, driving under the influence, driving in an unsafe manner, etc.

The driver of the vehicle must drive within the law including: ensuring that all road rules, traffic signs and statutory speed limits (including variable speed limits) are observed; and ensuring that the vehicle is always safely parked and not in breach of any regulations. Payment of any fines is the responsibility of the employee.
6. **Health & Safety Guidelines**

In this section, you will outline the health and safety guidelines your organisation sees fit for the Grey Fleet Drivers or alternatively could refer to the organisation’s traditional fleet policy. This can include the health of the driver, the upkeep of their vehicle, the use of their mobile phone, their safe driving skills, fatigue, alcohol and drugs, etc. For more information, see section 3: Core safety elements.

6.1 **General upkeep of vehicle**

Employees must ensure that the vehicle being driven is in a mechanically roadworthy condition and that the vehicle registration is current. The vehicles routine maintenance must be up to date, in line with the manufacturer’s recommendations. This can be ensured using Daily/Weekly pre-start checks (see Appendix 5 – Pre-start checklists). For more information, see section 3.3: Vehicle safety.

6.2 **Journey Management**

Here you will outline the importance of journey management when driving within the Grey Fleet. For more information, see section 3.5: Journey management, worker mobility and tasks.

XXXX appreciates that extensive travel may be required from time to time. Employees are however encouraged to seek alternatives to business travel where possible such as video or telephone conferencing. Employees must also plan journeys in consultation with their manager in advance to manage travelling time and use overnight accommodation when necessary. Where extensive travel is necessary, employees are required to take regular breaks.

6.3 **Breakdowns**

In this section you will outline how safety will be managed in here event of a breakdown. This can be ensured through the use of breakdown plans. For more information, see section 3.4.2: Breakdown planning.

In the event of a breakdown, employees should:

- Contact their breakdown provider if necessary using a roadside telephone.
- Always attempt to bring the vehicle to a halt in a safe place, away from fast moving traffic, preventing the vehicle from causing an obstruction or blocking other drivers’ views of the road.
- If broken down on the roadside activate the hazard warning lights on the vehicle immediately and keep them on until the vehicle is repaired or removed. A warning triangle should be used where appropriate.
- Stay with the vehicle but where possible stand on the pavement or embankment away from the road and vehicle. If this is not feasible or in bad weather sit in the front of the vehicle on the side nearest to the pavement or embankment.
- Do not attempt to fix the vehicle where it is dangerous to do so, for example where the vehicle is partly blocking the road or a lane of a motorway or dual carriageway, or where the vehicle is on a bend or narrow section of road.
- Travel with warm and preferably waterproof clothing in case you have to wait some time for assistance.
- Carry a torch, spare fuses and a mobile phone in the vehicle if possible.
6.4 What to do in the event of an accident

In this section, you will outline what an employee should do in the event of an incident. For further information please see the NRSPP Discussion Paper Incident Investigation – it pays to know why, when and how. This discussion paper includes a list of steps to be undertaken immediately after an incident has occurred.

**Version Control**

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Amendments</th>
<th>Replaces</th>
<th>Next Review Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Version 1.0</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Authorisation:**

_________________________________ ____________________________
Chief Executive Officer  Date of Authorisation
### 7.6. Appendix 6 - Grey Fleet Driver Declaration

<table>
<thead>
<tr>
<th>Driver Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Driver Name:</td>
</tr>
<tr>
<td>Licence Number:</td>
</tr>
<tr>
<td>License Expiry Date:</td>
</tr>
<tr>
<td>Contact Number:</td>
</tr>
<tr>
<td>E-Mail Address:</td>
</tr>
<tr>
<td>Manager’s Name:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Vehicle Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle Registration No:</td>
</tr>
<tr>
<td>Year of Manufacture:</td>
</tr>
<tr>
<td>Make:</td>
</tr>
<tr>
<td>Model:</td>
</tr>
<tr>
<td>Engine CC:</td>
</tr>
<tr>
<td>Fuel Type:</td>
</tr>
<tr>
<td>Last Service Date:</td>
</tr>
<tr>
<td>Odometer reading:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Insurance Policy Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Insurer:</td>
</tr>
<tr>
<td>Policy Number:</td>
</tr>
<tr>
<td>Insurance Policy endorsed for business use:</td>
</tr>
<tr>
<td>Insurance Policy Expiry Date:</td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Declaration</th>
</tr>
</thead>
<tbody>
<tr>
<td>I confirm I have read and agree to adhere to the conditions and guidance set down in the Grey Fleet policy, associated fleet operations manual, and acknowledge that I am responsible for all costs associated with operating my vehicle in the delivery of services for XXXX.</td>
</tr>
<tr>
<td>Signed:</td>
</tr>
<tr>
<td>Date:</td>
</tr>
</tbody>
</table>

Please return this document to your manager along with a copy of your current insurance document. If you use more than one vehicle, please complete a separate form for each vehicle. A new agreement must be generated annually or whenever a licence is altered or renewed or an insurance policy is altered or renewed.
7.7. Appendix 7 - References

- British Vehicle Rental and Leasing Association
- QBE Insurance Box, 2017, Personally Supplied information.
Who is the NRSPP?

The NRSPP has been established to provide a collaborative network for Australian businesses and organisations to help them create a positive road safety culture both internally and externally. It aims to help organisations of all sizes, across all sectors, to share and build road safety initiatives specific to their own workplace and beyond. It is delivered by ARRB and funded primarily by a government coalition and ARRB.

For more information and more tools like this policy guide please refer to www.nrspp.org.au