THE **TOP** TABLE

A pilot test of a new type of enforcement has begun. 'Earned Recognition' participants will be exempted from roadside checks in return for achieving key performance indicators. Will Dalrymple looks at the detail

Earned Recognition was partly borne out of market research that found that roadside checks, which are intrusive, tend to disenfranchise the best HGV and PSV operators, according to training and consultancy firm Chartwise UK.

FTA deputy chief executive James Hookham explains its rationale to *Transport Engineer*: "FTA's hope is that sufficient numbers of vehicles are recognised by Earned Recognition so that DVSA roadside enforcement resources can be transferred to more targeted operations against the persistent offenders and seriously illegal operations. The Bath tragedy was a wake-up call for DVSA and the industry as to where the real problems lie."

In exchange for skipping physical inspections, "operators must be able to show that they have robust systems and processes that promote effective and proactive transport management," says DVSA's Guidance Document for the Earned Recognition (ER) concept pilot.

Fleets are not required to share operational data; what they submit is a kind of aggregated statistical summary based on lots of individual actions.

The pilot system works by comparing key performance indicators in two aspects of truck fleet operations: maintenance and driver performance. KPIs are calculated as the number of infringement events versus the total number of tachometer days, expressed as a percentage. They are compared against pre-set numerical limits provided by the DVSA.

ER certainly sets the bar high, argues Hookham. He explains: "The distinctive feature of ER is that it is requiring participants to report their compliance continuously, and report exceptions and deviations from stated norms monthly. Other audit schemes rely on annual on-site audits to establish that compliance practices are in place and are functioning.

"DVSA says it wants to recognise exemplar operators, and the continuous compliance requirement will indeed be a tough standard to meet consistently. You can't have a bad day (or bad few days) and it not be noticed," says Hookham.

In the pilot, the driver portion covers multiple areas. Fixed penalty infringements are organised by band.

Limits are arranged in a declining scale from 1.3% for the least serious issues, Band 1, to 0.7% for Band 4 (see *https://is.gd/tamuhi* for a list of penalties by band). Other driver issues measured are working time infringements (limit: 4%); and instances of missing mileage, which are taken more seriously (0% limit, so zero tolerance, in fact). KPIs also flag up repeat offenders who have infringements in three consecutive periods.

The truck maintenance issues monitored are: that all (100%) of vehicles and trailers have a complete set of safety inspection records; that the vehicles' records are all (100%) correctly completed and signed off as roadworthy; that inspections are all (100%) completed when required; that driver defect reports of road safety-relevant items are all (100%) actioned; and that 95% of vehicles and trailers pass their MOT first time.

There is a little slack built into the system so that exceeding a limit won't immediately ring an alarm at DVSA.

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Generally, the system only informs DVSA when trends or extremes of non-conformance occur (but there are exceptions). For example, bad runs are reportable: failing any KPI either three times by less than one percentage point, or twice by more than one percentage point. DVSA is also informed when non-compliance is severe: when any indicator is exceeded by two percentage points or more, in any period, for example. And there are other criteria, too.

The process of immediately informing DVSA of reportable violations – called 'exceptions' – as well as regular four-weekly reports, is to be handled automatically by a electronic fleet management reporting system. In addition to managing and calculating the KPIs and reporting serious breaches, it also flags up to the operator what are called 'amber alerts' – incidents of exceeding a target that aren't sufficiently serious to require reporting. They might be seen as an early warning to the company that things are going amiss.

Even an exception report sent to the DVSA is not grounds for expulsion from ER; but it will prompt a response. That might range in severity from a request for further information, to a discussion, to developing and implementing a formal improvement action plan, to being kicked out altogether. DVSA says that in most cases the fleet operator will be given a chance to fix things first.

Applicants suitable for the ER pilot had to have been experienced (two years' operations history), squeaky clean (no TC actions in the last six months, except warnings), and undergo – and pass – a wide-ranging independent assessment of company records that would need re-sitting every two years. DVSA reports that eight auditors have so far been accepted to support the pilot; no DVSA personnel carry out audits.

Operators also have to install, and feed, the electronic reporting system. As this is the lynchpin of the whole ER compliance operation, it is responsible for holding all the data, running calculations, determining whether an operation meets the KPIs or not, and handling reporting. During the course of the pilot, DVSA is validating some reporting systems that had been agreed in principal for pilot use.

According to Hookham, most fleet management system providers are saying that their systems can be adapted to provide ER-compliant reports to DVSA. FTA, for example, says that its tachograph analysis package Visionfta is compliant with ER requirements. It is bundled together with r2c's Exemplar reporting software for truck maintenance; that has been modified to include a KPI calculation and visualisation tool (see also box, below).

Launch of the ER trial in April followed a feasibility study carried out last year. The trial is due to finish by the end of the year, after which point a final decision will be made about whether ER is to be rolled out at industry scale. Operators can register their interest by emailing *remote.compliance@vosa.gsi.gov.uk* TE

IS EARNED RECOGNITION FOR YOU?

James Hookham at the FTA advises that operators interested in working toward ER compliance seek help from their trade association or professional advisors to understand ER's requirements. For interested operators, FTA offers a gap analysis service to identify where improvements are needed, and develops a specific implementation plan.

However, he cautions that ER might not be right for every operator. He states: "The cost-effectiveness of the investment of time and money to achieve it, though, may mean it is harder for smaller fleets to justify, given the current range of benefits on offer, especially if they already have a green OCRS score."

Nick Walls, managing director of compliance software firm r2c Online (system pictured above), says that ER requires a cultural change to move away from a historical preference for paper. The adjustment period for a fleet that performs its own maintenance could be as short as a few months, but longer if that fleet outsources its maintenance or compliance work. However, r2c now has more than 800 workshops electronically reporting customer data using its platform.

Another vendor, Freeway Fleet Systems, will be launching an automated system data integrator (pictured p13) at the IRTE Conference this month. Managing director Patrick Tandy says: "Earned Recognition involves the provision of very straightforward summary data to DVSA. That in itself is relatively easy; the difficult part is getting the required data in the first place."