RED, AMBER,

Operators not currently taking their OCRS seriously need to do so, if they want to avoid a downward spiral of costs and public inquiries, writes Andrew Woolfall

onitoring and, where possible, managing your OCRS (operator compliance risk score) has become one of the most important functions for transport managers and fleet engineers. The system, introduced in 2006 and substantially revised last year, is the primary enforcement tool used by VOSA for determining which operators are targeted for enforcement. This translates into identifying which vehicles are stopped at the roadside for maintenance inspections or tachograph and paperwork examinations – and which have their premises visited for investigations.

Unfortunately, a substantial number of people still seem to be unaware of the OCRS system, its potential impact on their operations and, conversely, how it can be managed. So, to recap, OCRS is, as VOSA describes it, 'a risk-based measurement used to calculate the likelihood of an operator being noncompliant'. Every time a vehicle is encountered by VOSA, whether at the roadside, on annual test or at a fleet inspection, that encounter is logged. If problems are found, points are attributed, depending on their severity. A risk score is then calculated, taking into account the last three years. Points are weighted, so they diminish in value as they age.

VOSA performs a weekly calculation, taking into account the number of encounters and the total value of points. Scores are then awarded to each operator – one for roadworthiness and one for traffic compliance. Each score is mapped to a colour band – red, amber or green. However, certain infringements or defects are deemed by VOSA to be so serious as to merit the operator concerned being sent 'straight to red', regardless of the three-year score.

On the road, VOSA uses number plate recognition to determine which vehicles are stopped for inspection. This involves cameras fitted in VOSA vehicles or mounted at the roadside, and linked to VOSA's database. As a vehicle drives past a camera, the operator's database is checked, along with its OCRS score. If the



operator is in the red zone, the vehicle will always be stopped for inspection. If, though, the operator has a green rating, the vehicle will pass. Where the operator is ranked amber, the vehicle will be stopped, if no red vehicles are present.

Targeting action

VOSA takes the view that the score reflects the likelihood of the operator being non-compliant. OCRS, it says, enables its inspectors to target vehicles at the highest risk of infringements, whether mechanical defects or problems with tachograph charts or drivers' hours etc. Whenever a vehicle is stopped, there are clear costs to the operator. Vehicles are delayed, which might mean loads being rejected. Also, if defects are present, both the driver and operator risk enforcement action. It is therefore in an operator's interest to manage its OCRS score so that it stays within the green category. Failure to do so means a

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GREEN



vicious circle, with vehicles potentially being stopped increasingly frequently. As more defects or infringements are found, the OCRS score gets progressively worse, meaning vehicles are stopped more regularly. Then drivers risk more fixed penalty notices, while operators risk prosecutions and an increasing likelihood that VOSA will pay a visit for a full maintenance or drivers' hours investigation. This, in turn, can lead to a public inquiry.

In the green

Managing your OCRS score starts with knowing your colour coding now. Finding out is easy, requiring the operator to register with VOSA. The enforcement authority will then make the latest OCRS rating available, along with details of vehicles' annual test pass rates, identifying the causes of failures and providing information on roadside encounters – for example, confirming when vehicles have been stopped and clarifying issues arising. Go to: https://www.gov.uk/manage-commercial-vehicle-compliance-online

Given that the score is recalculated every week, transport managers or fleet engineers would do well to check their scores on a similar basis. Beyond that, however, you need proper systems and procedures to ensure that, whenever a vehicle is encountered by VOSA, no defects or infringements are found. And that includes at the annual test. Vehicles need to pass the test at first presentation, avoiding a PRS (pass after rectification at the station).

But the same applies to vehicles in service. Systems must ensure that drivers perform thorough daily first-use inspections, with defects appropriately remedied. Similarly, for the 'traffic' score, they need to manage drivers' hours and tachographs. And they must prevent vehicles from being overloaded, while also ensuring that, if they carry hazardous materials, all proper cards and controls are in place. The aim throughout is to ensure that, whenever a vehicle is examined by VOSA, no defects are found and the encounter is 'clear'. This will serve to reduce the three-year score and bring down the colour rating.

There is anecdotal evidence of operators taking this farther and attempting to force encounters, in order to get clear inspections and thus positively affect their OCRS scores. Ruses evidently range from submitting vehicles for MoT when the test is not required, to ensuring that vehicles drive past VOSA checkpoints in the hope that they get pulled.

Either way, operators should remember that, if a vehicle is not listed on the operator's licence, credit will not be given for a 'clear' check. This particularly affects trailers or PCV vehicles – neither of which is traditionally specified on a licence.

Then, squaring the circle, by regularly monitoring the OCRS and the vehicle encounter history, transport managers can immediately see that such systems are working. Some operators use the data to incentivise management by including reductions in the OCRS score as part of individuals' performance criteria. A reduction in the OCRS score might lead to a bonus. In such circumstances, any negative change in colour can be acted upon immediately.

Whatever your approach, make no mistake: traffic commissioners are impressed by operators who proactively manage their OCRS. Conversely, where an operator is ignorant of the system or leaves its rating to chance, there may be regulatory action. During inquiry hearings, operators are increasingly being asked what their scores are and to explain how they monitor them. Operators with no systems may well struggle to persuade the commissioner that they are likely to be compliant in future. \blacksquare

Getting OCRS right?

Despite the changes introduced in 2012, criticism is still levelled at the OCRS. The 'straight to red' provisions, for example, can have a disproportionate effect on operators. A recent transport select committee felt that VOSA may be unfairly targeting smaller operators, who are less frequently on the road, suggesting that enhancements to OCRS should be considered to counter this. How quickly change will come is open to conjecture.

What is clear, however, is that the OCRS will remain an important VOSA enforcement targeting tool for the foreseeable future. Operators who are proactive, in terms of its management, have a clear advantage over the competition.