

## **DRIVING STANDARDS AGENCY**

# **RISK ASSESSMENT OF LARGE GOODS VEHICLE and PASSENGER CARRYING VEHICLE TESTING**

## **INTRODUCTION**

1.1. DSA is responsible for testing large goods vehicle (LGV) and passenger carrying vehicle (PCV) drivers. Relatively few tests are carried out; in the financial year 2000/1, only 4% of practical tests were for LGV & PCV (car tests accounted for 88% and motorcycle tests 8%). In 2001/2 the percentage of LGV & PCV practical tests was similar. This testing is a specialised working practice for DSA examiners and the Agency has a network of test centres dedicated solely to delivering this type of test, often but not inevitably on VOSA premises. This working practice was last subjected to a detailed occupational health and safety (OHS) review over 6 years ago and an LGV & PCV testing risk assessment was issued on 20 September 1996. This now outdated and should be recycled or destroyed.

1.2. The Agency is also responsible for PCV driver quality monitoring (DOM) testing in a growing number of locations across the country. This working practice is covered by a separate risk assessment dated 27 March 2001, which is still in force.

1.3. OHS incident (*ie* accident, near miss and assault) statistics compiled each year show LGV & PCV tests to be the least safe form of practical testing undertaken by the Agency. Comparison of incident reports received in 2000/1 & 2001/2 with the number of practical tests in those years reveals the following probabilities:

### **OHS INCIDENTS – ONE TEST: NUMBER OF OCCURRENCES** (2000/1 data, followed by 2001/2 data in brackets)

	<b>LGV &amp; PCV Tests</b>	<b>Car Tests</b>	<b>All Types of Practical Tests</b>
<b>Accidents and Near Misses</b>	1,385 (1,245) total number 44(60)	2,260 (2,128)	2,141 (2,057)
<b>Accidents Only (injury and/or damage)</b>	1,640 (1,389) total number 41(55)	2,586 (2,558)	2,458 (2,435)
<b>Resulting Injuries</b>	3,895 (4,814) total number 16(15)	4,764 (5,930)	4,444 (5,584)

1.4. The increasing probability of an LGV & PCV incident or accident over these 2 years is almost certainly due to a decrease in the amount of under-reporting; in other words, more minor accidents are being reported. This is borne out by the decreasing probability of injury for LGV & PCV tests; this also applies to other tests.

1.5. This risk assessment describes each element of the LGV & PCV testing working practice; the general qualities of examiners, candidates and members of the

## *DSA Generic Risk Assessment - LGV & PCV Tests*

public, the test vehicles, test conduct, test routes and the non-test elements. It follows Health & Safety Executive (HSE) guidance by detailing:

- The possible hazards,
- Who might be harmed,
- Whether the risks are adequately controlled, and finally by:
- Recommending any further actions necessary to control the risks.

### **POSSIBLE HAZARDS AND THOSE AT RISK**

2.1. **Potential Hazards.** LGV & PCV tests have the potential to cause injuries and illness from the following, not listed in any order of importance or likelihood:

- Road traffic accidents (RTA),
- Slips, trips and falls,
- Harsh braking and vibration,
- Stress,
- Assaults.

2.2. **Those at Risk.** Examiners are primarily at risk; they suffered all of the 16 injuries reported during LGV & PCV testing in 2000/1 and all of the 15 injuries reported in 2001/2. Candidates and members of the public not connected with these tests are also at risk; although no injuries to them were reported during these 2 years, 57% of all incidents in 2000/1 and 67% in 2001/2 resulted in damage to candidates' or 3<sup>rd</sup> parties' vehicles. In 2000/1, 3 examiners received back injuries which led to their absence from work for over 3 days; this is categorised by the HSE as a *serious accident*. There were no injuries of this severity in 2001/2.

2.3. **Over-View of Existing Controls.** The ways in which the Agency seeks to control the various hazards are briefly summarised below and are fully described in the next section.

2.4. **Road Traffic Accidents.** In 2000/1, 80% of LGV & PCV RTA involving a second vehicle were caused by candidates; in 2001/2 the proportion was 63%. The remainder were the fault of 3<sup>rd</sup> parties; no examiners were to blame. To help prevent RTA, DSA can only ensure the selection of safe test routes in advance and empower examiners to intervene if and when it appears accidents are imminent.

2.5. **Slips, Trips and Falls.** In 2000/1, 31% of injuries resulted from examiners' slips, trips and falls on entering or leaving LGV and in 2001/2 the proportion was 20%; there were none involving PCVs in either year. One of the accidents in the first year resulted in a back injury causing more than 3 days absence (an *HSE serious accident*). DSA currently attempts to control this hazard by providing examiners with suitable footwear and by teaching safe methods of entering and leaving LGV at the start of examiners' LGV & PCV training at Cardington.

2.6. **Harsh Braking and Vibration.** Half the examiner injuries during 2000/1 were due to harsh braking (31% in LGV and 19% in PCV), which caused 1/3 of the injuries in 2001/2 (all were in PCV). In 2000/1, 2 LGV accidents resulted in back injuries causing more than 3 days absence (*HSE serious*) and 13% of injuries

## *DSA Generic Risk Assessment - LGV & PCV Tests*

came from "rough rides" in LGV. Worryingly, 23% of all LGV & PCV examiner sickness recorded during the 36 months since October 1999 was due to musculo-skeletal disorders (MSD) (for all examiners the proportion was 18%). The injuries and sickness are linked to the lack of minimum test vehicle (MTV) standards. DSA requires MTV standards for cars on test (seat belts, head restraints, examiner mirrors) to control similar hazards but has not yet done so for LGV & PCV. On these tests these hazards are presently uncontrolled.

2.7. **Stress.** No stress-related injuries were reported in 2000/1 or 2001/2, but investigation of LGV & PCV examiner sickness during the 36 months from October 1999 showed 20% resulted from stress and/or depression. DSA currently attempts to reduce any stress associated with these tests by ensuring examiners are suitably selected, trained, supervised and informed; by ensuring adequate time is allocated for each test; and by ensuring examiners also have as much freedom as possible in conducting their tests.

2.8. **Assaults.** Only 5 of the 204 assaults reported in 2001/2 (2%) were connected with LGV & PCV tests. All resulted from candidates unhappy about failing their tests; 4 involved verbal assaults on the examiners concerned and the 5<sup>th</sup> resulted in a hole being kicked in a waiting room door.

### **CURRENT CONTROLS – DETAILED ARRANGEMENTS**

3.1. The following sections describe in detail the possible risks, those at risk, the current controls and any further actions recommended. Some of the controls are relevant to more than one heading and where this is the case, details are only given once to avoid unnecessary repetition.

3.2. Data for the 44 incidents reported in 2000/1 and the 60 incidents reported in 2001/2 show these were caused by the following groups and both years indicate similar trends. It is stressed that DSA has a "no blame" culture for OHS incident reporting and the examiners who were responsible will not be identified. These data are intended only to highlight the overall trends and to prompt any management action necessary to improve the safety of LGV & PCV testing.

#### **RESPONSIBILITY FOR OHS INCIDENTS**

(2000/1 data followed by 2001/2 data in brackets)

<b>Incident Category</b>	<b>Examiners</b>	<b>Candidates</b>	<b>Members of the Public</b>	<b>Category Totals</b>
<b>Accidents with Injury and Damage</b>		2 (2)		<b>2 (2)</b>
<b>Accidents with Injury only</b>	5 (6)	9 (5)	0 (2)	<b>14 (13)</b>
<b>Accidents with Damage only</b>		21 (29)	4 (11)	<b>25 (40)</b>
<b>Near Misses</b>		3 (5)		<b>3 (5)</b>

## DSA Generic Risk Assessment - LGV & PCV Tests

Totals of Those Responsible	5 (6)	35 (41)	4 (13)	44 (60)
-----------------------------	-------	---------	--------	---------

### LGV & PCV DRIVING EXAMINERS

#### Possible Hazards and Those at Risk

4.1. Examiners are properly selected, trained and managed to reduce the risks to themselves, to test candidates and to members of the public. Examiners' illness or undeclared disabilities could lead to further risks, although current controls make this unlikely. Examiners were, however, responsible for 5 of the 16 accidents resulting in injury (31%) in 2000/1 and for 6 of the 15 (40%) in 2001/2; all but one were due to slips on entering or leaving LGV. Because of this significant proportion of accidents, I assess the risks currently posed by examiners to be MEDIUM severity, however by taking the simple action proposed below, this could be reduced to LOW.

#### Existing Controls

4.2. **Suitability and Competence.** LGV & PCV examiners are volunteers drawn from the pool of car examiners; it is not currently possible to enter the Agency specifically as an LGV & PCV examiner. Potential LGV & PCV examiners must have held an LGV & PCV driving licence, covering the categories of vehicle they will be testing, for at least 3 years. Unlike potential motorcycle examiners, there are no assessment rides before selection and as no potential examiner familiarisation training is available, any unsuitable volunteers must be weeded out during training.

4.3. **Training.** LGV & PCV training takes place at the DSA Training Establishment at Cardington, which runs 3 different types of course:

- **Initial training courses** are 4 weeks long and in each 2 trainees are supervised by one trainer. Courses emphasise the OHS issues connected with the working practice, the test centres and the vehicles. Regular progress checks take place, culminating in a final test and end-of-course evaluation; these are all conducted by a different trainer. All checks and tests must be successfully passed to qualify as an LGV & PCV examiner.
- **Refresher courses** last 2 weeks. They are intended for examiners who have not conducted LGV & PCV testing for 6 months or more, and cover the most important elements of the initial training course again. Examiners attending are nominated by Areas.
- **Familiarisation courses** run for 2 weeks and enable Sector Managers (SMs), with no experience of driving LGV & PCV, to carry out check tests.

4.4. **Check Tests.** Check tests are conducted by accompanying SMs or Senior Driving Examiners (SDEs) in accordance with *Standard Operating Procedures (SOP) DT2 2.4 – 2.8* and *SOP DT3 2.2 – 2.4*. Examiners who fail to achieve satisfactory standards are given advice, guidance and, if necessary, warnings. If required they then undertake remedial training.

## ***DSA Generic Risk Assessment - LGV & PCV Tests***

4.5. **Sickness.** Examiners must not work when sick; the *DSA Policy and Procedures for the Management of Sick Absence* describe what they must do if they are ill. If necessary, Human Resources Team (HRT) will arrange consultations with DSA's Medical Advisors, and examiners can arrange reimbursement of the costs of physiotherapy, osteopathy, acupuncture or chiropractic treatment for accidents at work through the *Westfield Health Scheme Ltd.*

4.6. **Disabilities.** Examiners have a responsibility to notify HRT of any disabilities, and if these are confirmed as coming under the *Disability Discrimination Act 1995 (DDA)*, the Agency is obliged to make reasonable work adjustments to ensure they are not treated less favourably than others. Each case is considered individually by HRT and it is not possible to make a blanket statement of which disabilities (and the extent of any disabilities) which will or will not debar examiners from LGV & PCV testing. Safety is a major consideration in each decision.

4.7. **Stress.** During the previous 3 years stress and/or depression accounted for no less than 20% of all LGV & PCV examiner sickness. Stress could be caused by one or a combination of several factors, as described below, and the controls currently in place to control stress are listed. DSA appears to have a problem which requires further investigation, but if the LGV & PCV MTV standards recommended in *paragraphs 7.9 to 7.15, below*, are introduced without delay, they should have a positive effect on reducing examiner stress.

- **Pace and Quantity of Work.** LGV & PCV examiners undertake 4 tests per day, at 0845, 1030, 1300 and 1430. The on-the-road element of each test should be a minimum of 50 minutes. The workday therefore appears to include adequate rest periods.
- **Control of Work.** Examiners to have an element of control over test conduct by having the option of cancelling tests on safety grounds (*paragraph 7.3, below*), by being able to hold the gear changing exercises at any time during the road element of tests (*SOP DT1 3.38*) and, in some locations, by having the option of carrying out the uncoupling and re-coupling exercises at the start or the end of the test (*paragraph 8.9, below*).
- **Knowledge, Training and Information.** *Paragraphs 4.2 and 4.3, above* describe how LGV & PCV examiners are selected and trained. Once trained, they are kept informed of the safety measures affecting their work through amendments to *SOP DT1, SOP DT2, SOP DT3, other SOPs* issued by Technical Standards Branch (TSB) and Central Operations Branch (COB), and *DSA H&S Advice Notes*.
- **Supervision.** SDEs and SMs exercise day-to-day supervision of LGV & PCV examiners; in addition, they are check tested frequently as described in *paragraph 4.4, above*.

### **Further Controls Necessary**

4.8. With the following exceptions, I consider DSA currently takes reasonably practicable steps to make LGV & PCV examiners work safe.

## *DSA Generic Risk Assessment - LGV & PCV Tests*

4.9. **Entering and Leaving LGV Cabs.** In view of the number of slips on entering or leaving LGV, I recommend the Agency gives increased emphasis to the dangers and safe methods during each of 3 training courses above. Examiners should also be regularly reminded of the hazards by TSB or COB SOPs. **Actions: Training & Development Manager, Chief Driving Examiner and Central Operations Manager.**

4.10. **Stress.** The causes for the relatively high levels of LGV & PCV examiner stress should be investigated with a view to taking any remedial action necessary. **Actions: Chief Driving Examiner; Human Resources Director**

## **CANDIDATES**

### **Possible Hazards and Those at Risk**

5.1. LGV & PCV candidates demonstrate they have reached the required standard for driving motor vehicles unsupervised by passing their car tests (*Driving Goods Vehicles – the Official DSA Syllabus [DGV]*). Candidates were, however, responsible for 16 out of the 20 (80%) LGV & PCV test RTA involving a second vehicle in 2000/1 and 22 out of 35 (63%) in 2001/2. These were mainly caused by poor steering and misjudgement of test vehicle size. Candidates were also responsible for 12 collisions (8 in LGV, 4 in PCV) with non-vehicle objects in 2001/2. Of the 44 accidents and near misses on test in 2000/1, 35 (80%) were the fault of candidates; of the 60 in 2001/2, 41 (68%) were their fault. Candidates were also directly responsible for 11 (69%) of the 16 injuries in 2000/1 and 7 (47%) of the 15 in 2001/2. I therefore consider candidates currently present MEDIUM risks.

### **Existing Controls**

5.2. **Licensing and Identity.** Candidates must produce the following for checking by examiners before LGV & PCV tests commence (*SOP DT1 3.22 – 3.23*).

- A provisional LGV or PCV driving licence for the category of test required; candidates for tests on articulated LGV (C1+E or C+E) must have full licences to drive rigid LGV (C1 or C). Candidates for LGV tests must hold full driving licences for category B vehicles in order to get provisional LGV licences (*DGV Part 1*). Candidates for PCV tests may hold licences restricted to automatic category B vehicles, but they can then only drive PCV with automatic gearboxes; to drive manual PCV full category B licences are required (*Driving Buses & Coaches – the Official DSA Syllabus [DBC] Part 1*),
- An LGV or PCV theory test pass certificate, and
- Acceptable identity documents (*SOP DT1 1.10*).

5.3. **Medical Requirements.** An LGV or PCV candidate is required to send DVLA a doctor's medical report before a provisional licence can be issued. LGV &

## ***DSA Generic Risk Assessment - LGV & PCV Tests***

PCV tests do not include eyesight tests in the same way as car and motorcycle tests; candidates' vision is checked during their provisional licensing medical examinations (*SOP DT1 3.24*). The full standards and scope of the doctors' reports are described in *DGV Part 1 & DBC Part 1*.

**5.4. Disabilities, Pregnancy, Illness and Incapacity.** The pre-licensing medical examinations ensure that candidates are sufficiently healthy for LGV & PCV driving; *DGV Part 1 and DBC Part 1* both contain details of conditions which would result in licences being refused. These references state candidates must advise the DVLA Drivers Medical Unit of any serious illnesses or disabilities which last for more than 3 months and are likely to affect their driving. If, despite these precautions, examiners suspect that candidates' undeclared disabilities, illnesses or incapacities due to drink or drugs would make tests unsafe, they should make discreet enquiries and if necessary tactfully terminate, or refuse to commence tests (*SOP DT1 1.14, 3.22 & 7.11*). A similar procedure can be followed for candidates in the advanced stages of pregnancy, but if they insist on continuing with tests, examiners must allow them to do so. Examiners are, however, advised never to attempt to diagnose disabilities, illness or pregnancy. Disability awareness is covered in the 3<sup>rd</sup> week of the LGV & PCV examiner training course.

**5.5. Interpreters.** Deaf or non-English speaking candidates can be accompanied by interpreters, who may also be their ADIs. *SOP DT1 7.8 refers*, but contains no advice on where interpreters should sit in LGV or PCV. This is left to examiners, who should be guided by advice that TSB should issue in accordance with *paragraph 7.6 and 7.12 below*.

**5.6. Mandatory Periods Between Rebooking Tests.** A mandatory minimum of 3 days must elapse between the dates of an LGV or PCV test failure and taking the next test. This period is intended to encourage those who fail to undertake more training and should thereby further enhance test safety.

### **Further Controls Necessary**

**5.7.** I believe the Agency currently takes reasonably practicable measures to control the risks associated with candidates. It is DSA's intention eventually to extend the voluntary logbook scheme for car test candidates to LGV & PCV candidates. This would undoubtedly improve candidate, and therefore test, safety.

## **MEMBERS OF THE PUBLIC**

### **Possible Hazards and Those at Risk**

**6.1.** Members of the public were responsible for 4 of the 41 accidents (10%) during 2000/1 and for 13 of the 55 accidents (24%) in 2001/2; these were all caused by their vehicles running into test LGV or PCV. No members of the public were injured but all the vehicles involved were slightly damaged. I therefore assess the risks posed by members of the public as LOW at the present.

## *DSA Generic Risk Assessment - LGV & PCV Tests*

### **Existing Controls**

6.2. **Public Awareness.** As it is not possible for DSA directly to control the actions the public, the only feasible control measure is to make them aware that test vehicles are being driven by provisional drivers. *SOP DT1 3.28* requires L (or, in Wales, D) plates to be displayed on test vehicles, clearly visible from the front and rear.

### **Further Controls Necessary**

6.3. I consider there is little more the Agency can reasonably practicably do to control risks associated with the public, and believe that no further control measures are feasible at the present.

## **TEST VEHICLES**

### **Possible Hazards and Those at Risk**

7.1. Test LGV and PCV have the potential either to cause accidents or make any accidents that happen worse, and thereby injure examiners, candidates or members of the public. Unsafe test vehicles could also cause damage to equipment and/or property, either by causing RTA, by contributing to their consequences, or by causing harm to the occupants' health through excessive vibration, noise, fumes *etc.* In addition to the braking and vibration injuries mentioned in *paragraph 2.6, above* and discussed in more detail below, an examiner was injured in 2001/2 by engine fumes inside a PCV. In view of the large proportion of accidents and injuries associated with test vehicles, I currently assess them to pose generally HIGH risks.

### **Existing Controls**

7.2. **DVLA Standards.** Basic MTV standards are laid down in *DVLA pamphlet INF29 4/01*, and include the following requirements:

- Each test vehicle and vehicle combination must be unladen except for fixed items that are characteristic of the category of vehicle to which it belongs. *SOP DT1 3.10 & 3.13* also state LGV must be unballasted,
- All vehicle combinations used for tests in categories B+E, C1+E, D1+E, C+E and D+E must be equipped with suitable coupling and braking systems designed for use when trailers are fully laden,
- Each vehicle used for any type of category D test must normally allow an examiner to see the road behind the vehicle clearly from the deck on which the driver is seated, without using any optical aid.

## *DSA Generic Risk Assessment - LGV & PCV Tests*

- Minimum speeds and the maximum authorised mass for each category of entitlement are also specified in the pamphlet.

7.3. **Other General Controls.** Other controls are described in detail in *SOP DT1 3.2 – 3.14*, and the following are also included:

- Candidates are responsible for the safety of their test LGV and should make the necessary checks before tests take place (*SOP DT1 3.29*),
- Examiners should satisfy themselves that the cab-locking mechanisms of tilt cabs are secure (*SOP DT1 3.33*),
- Test LGV should have functioning direction indicators and stop lamps (*SOP DT1 3.27*),
- Each PCV candidate is required by *SOP DT1 3.30* to demonstrate knowledge of fitted safety equipment prior to the reversing exercise by showing the examiner where the fuel cut-off, fire extinguisher and emergency door are, and how the latter operates. If the emergency exit door is inoperative the test is terminated.
- In addition to these prescribed standards, examiners can refuse to take unsuitable vehicles on test, or terminate a test when they believe any test vehicle constitutes a risk to their, or others' H&S (*SOP DT1 7.17* also refers).

7.4. **Seat Belts.** Harsh braking injured 8 examiners in 2000/1 (5 in LGV and 3 in PCV) and 5 in 2001/2 (all in PCV). Two of the former were directly attributed to a lack of LGV seatbelts and the OHS reports show seatbelts would have prevented or mitigated all the other injuries. Furthermore, 2 of the LGV harsh braking injuries in 2000/1 were *serious*, both causing more than 3 days sick absence. Seatbelts are not legally required in LGV & PCV but their absence, especially in some older vehicles, undoubtedly puts examiners at risk. I recommend the Agency investigate the situation with a view to making seat belts compulsory for LGV examiners as soon as possible; the situation regarding PCV is less clear-cut as examiners occasionally have to stand to conduct tests. The HSE have advised that training LGV should have seat belts for drivers and trainers in order to ensure a safe working practice; not to do so would breach H&S legislation. Many newer test vehicles do have suitable seat belts, and while *SOP DT1 3.33* states examiners must wear them when they are fitted, some examiners seem reluctant to do so; possibly this is due to the need to move around to see via candidates' mirrors, in the absence of suitable examiners' mirrors (see recommendation at *paragraph 7.8, below*). I advise the requirement to wear seat belts should be reinforced during check testing and by regular reminders in TSB and / or COB *SOPs*.

7.5. **Vibration.** "Rough rides" injured 2 examiners in 2000/1. Both involved LGV driving at speed over poor surfaces. Although several examiners have complained of excessive and uncomfortable vibration from some training bodies' older LGV & PCV, there have been no reports to date of *injuries* caused purely by whole-body vibration. But it is likely that excessive vibration is a major contributor to cumulative musculo-skeletal injuries which develop over a period of time and cannot be attributed to any one test; as stated in *paragraph 2.6 above*, 23% of all LGV & PCV examiner sickness during the last 3 years resulted from MSD, 5% more than the

## **DSA Generic Risk Assessment - LGV & PCV Tests**

control group of all examiners over that period. The hazards associated with excessive vibration are currently uncontrolled, as the relevant standard *ISO 2631* is only advisory and VOSA does not test vehicles for vibration. In 2005, however, UK regulations will be introduced as a result of the recent *European Commission Physical Agents (Vibration) Directive* laying down a daily exposure limit and an action level for whole-body vibration, but as DSA has a significant OHS vibration problem the Agency should not wait for these regulations and is legally obliged to act now. I have recommended in a separate report that HSE's Health & Safety Laboratory (HSL) measures vibration in a sample of the worst vehicles. HSL carried out similar readings for the Defence School of Transport, Leconfield, recently, and HSE used the results in a study. If HSL carries out similar work for DSA, HSE is willing to include DSA in this study free of charge. This will undoubtedly have great benefits for the LGV & PCV testing working practice.

**7.6. Seats for LGV Examiners.** The potential hazards of unsuitable LGV 3<sup>rd</sup> seats were described in my risk assessment of Cardington's training LGV (*Risk Assessment of Use of 3<sup>rd</sup> Seats by DSA Staff, dated 6 September 2000*). These risks could include reduced visibility, poor posture, insecure installation and excessive whole-body vibration. The risk assessment recommended the issue of a *TSB circular* and the amendment of *SOPs DT1, DT2 and DT3* to cover the following requirements:

- Examiners of any grade and other DSA staff must not occupy unsafe or unsuitable non-standard 3<sup>rd</sup> seats under any circumstances. DSA has no objection to such seats being occupied by non-DSA employees such as interpreters, trainers *etc* for whom the Agency has no responsibility.
- LGV examiner check tests must be restricted to LGV with 3<sup>rd</sup> seats which, in the judgement of the manager carrying out the check test, do not present any hazards. Furthermore, to ensure test safety, examiners' seating should always have priority over that of any managers conducting check tests (*SOP DT1 3.25*) and examiners should be able to tell the checking officers where they should sit, rather than vice-versa, as occasionally happens.
- If 3<sup>rd</sup> seats are not present, 3<sup>rd</sup> parties should not be allowed in the cabs of LGV on test, whether they are DSA staff or otherwise. Sitting on engine covers *etc* is unsafe and could endanger properly seated examiners and candidates.
- All OHS incidents on test involving LGV 3<sup>rd</sup> seats must be fully reported in accordance with *DSA H&S Advice Note 2/00 and SOP DT1 Chapter 8*.

- These recommendations were not actioned at the time, but I advise they now should be, without further delay.

**7.7. Seats for PCV Examiners.** In 2001/2, the lack of safe PCV seating caused 6 examiners to be injured during PCV tests and a further 2 examiners to be injured while conducting PCV DQM tests. PCV examiners often have to stand, sit at right angles to the direction of travel or perch on forward-facing seats and are therefore vulnerable if an accident occurs, particularly as few of these seats have seatbelts. Improved PCV seating for examiners would undoubtedly make their work safer, and I recommend that TSB investigates when and how safer PCV seating can be made mandatory. On HSE advice, any training bodies without such arrangements

## *DSA Generic Risk Assessment - LGV & PCV Tests*

for their own instructors would be in breach of H&S regulations. The Agency needs to be able to demonstrate that it has done all that is reasonably practicable to control all the risks associated with PCV seating, and it cannot do so at present.

7.8. **Mirrors.** Test LGV & PCV are not required to have mirrors for examiners' use. Examiners generally feel that such mirrors are essential both to ensure safety and for accurate assessments of candidates' performance, particularly in view of the increasing use of large box body and curtain sided LGV on tests. My *1996 LGV & PCV Driving Test Risk Assessment* recommend that examiner mirrors be fitted to all test vehicles; this was not taken up and I now recommend the Agency should make the requirement for examiner mirrors compulsory. It is worth commenting that the *Corporate Governance and Risk Management cascade briefing* held in the Agency in March 2002 cited DSA's insistence on examiner mirrors as one of the positive steps the Agency had taken to control risks; I agree, and strongly believe this should be applied across the board and not merely to cars. The HSE have recently stated that all training vehicles should have mirrors for the trainer as well as the trainee, or the training bodies will fail to ensuring a safe working practice and be in breach of OHS legislation.

### **Further Controls Required**

7.9. Examiners are currently put at risk by the lack of suitable LGV & PCV MTV standards. I consider it reasonably practicable for DSA to insist on such standards; the Agency has done so for cars on test, and HSE advice is that LGV & PCV used by training bodies should have suitable seats, seat belts and mirrors for instructors' use. In view of the higher than average probability of LGV & PCV test accidents (*see paragraph 1.3, above*), and the high level of LGV & PCV examiner illness from MSD (*see paragraph 2.6, above*) I recommend mandatory provision of the following safety features as soon as possible. Examiners, training bodies and other candidates should be informed, *SOPs DT1, DT2 and DT3* should be amended and the additional controls should be covered in the LGV & PCV training courses.

7.10. **Seat Belts.** I recommend:

- DSA requires all test vehicles have seat belts for examiners' use as soon as possible.
- Examiners be required to use seatbelts whenever they are fitted, now and in the future when the above recommendation is implemented, and managers should make occasional checks of compliance. **Actions: Chief Driving Examiner, Policy Director, Training & Development Manager.**

7.11. **Vibration.** I recommend:

- The Agency asks HSL to measure the vibration levels on a sample of test vehicles and invites HSE to include DSA in their current study of LGV vibration.
- With the HSL and HSE findings to hand, DSA considers how LGV & PCV likely to cause excessive vibration can be excluded from tests and the Agency issues an MTV standard to make it clear that such vehicles are no longer

## *DSA Generic Risk Assessment - LGV & PCV Tests*

acceptable. **Actions: Chief Driving Examiner, Policy Director, Training & Development Manager.**

7.12. **LGV Seating.** I recommend:

- The recommendations concerning LGV testing in my *Risk Assessment of the Use of 3<sup>rd</sup> Seats by DSA Staff* should now be implemented as soon as possible.
- That examiners be empowered to tell managers conducting check tests where *they* should sit. **Actions: Chief Driving Examiner, Training & Development Manager.**

7.13. **PCV Seating.** I recommend DSA develops an MTV standard for safer examiner seating in test PCV, including the requirement for seat belts. **Actions: Chief Driving Examiner, Policy Director, Training & Development Manager.**

7.14. **Mirrors.** I recommend the Agency issues an MTV standard requiring all test LGV & PCV to be fitted with suitable external mirrors for examiners' use, in addition to their mandatory drivers' mirrors. **Action: Chief Driving Examiner, Policy Director, Training & Development Manager.**

## **TEST CONDUCT AND ROUTES**

### **Possible Hazards and Those at Risk**

8.1. The conduct of LGV & PCV tests and the routes selected could, if not adequately controlled, give rise to hazards which could affect examiners, candidates and members of the public. Most aspects are now adequately covered and I assess the associated risks to be LOW at the present time.

### **Existing Controls**

8.2. **LGV & PCV Test Requirements.** *SOP DT1 Chapter 3* describes the specific requirements of LGV & PCV tests. *SOP DT1 3.17 & 3.18* list the possible faults on tests. From September 2003 (in order to meet a *European Commission Directive*) the following additional elements will be added to the tests:

- The LGV reversing exercise described in *paragraph 8.4 below* will now involve reversing to within ½ metre of a simulated loading bay,
- The tractor of an articulated LGV unit must be parked alongside the trailer after the uncoupling exercise described in *paragraph 8.8, below*.
- Candidates for both LGV and PCV tests will be required to demonstrate how they would check lights, indicators and fluid levels.

## *DSA Generic Risk Assessment - LGV & PCV Tests*

8.3. **Termination.** Examiners may terminate tests at any time for reasons of safety as described in *SOP DT1 7.2 & 7.3*. Tests may also be terminated at candidates' request (*SOP DT1 3.55*).

8.4. **Reversing Exercise.** The current and future (from September 2003) exercises involve:

- **Current Arrangements.** Each examiner is required by *SOP DT1 3.20* to lay out the manoeuvring area for the vehicle to be tested in advance of the test taking place. This involves positioning marker cones and thus contains an element of manual handling (MH). The position of the cones is determined by the dimensions of the vehicle under test and whether they have trailers; the *Annex to the former DT1 Chapter 7 referred*; this is not yet in the *SOP DT1 revision*. Trainee examiners are instructed in the OHS issues associated with this exercise during their initial training; this appears adequate as no attributable MH incidents were reported during 2000/1 or 2001/2.
- **From September 2003.** The LGV exercise will involve reversing to within ½ metre of a simulated loading bay, represented by beams at 1 metre and 1½ metres high, supported by uprights slotted into a base. This terminal barrier will be left permanently in position except on sites with public access; on these sites and on occasions when candidates demolish the barriers, examiners will have to re-erect the beams and / or uprights. These elements will be made of plastic or light alloy tubes, and it is planned to make the base wheeled to eliminate any MH problems. OHS Unit will assess the safety of the simulated loading bay when TSB has decided on the final design.

8.5. **Braking Exercise.** Before leaving the test centre grounds, each candidate must carry out a braking exercise. Failure to complete the exercise successfully would normally result in test termination. Trainee examiners are briefed on the OHS issues associated with this exercise during their initial training. At VOSA sites the exercises are normally carried out on separate test tracks; if these are not available, manoeuvring areas may be used subject to individual approval by SMs. *SOP DT1 3.34* describes the test track dimensions, the required speeds and the conduct of this exercise. All emergency braking test tracks should end in some method of stopping test vehicles which fail to stop due to brake failures or driver "blackouts". Former VOSA brake test ramps or, less frequently, gravel-filled speed retarding pits or long, clear run-outs fulfil this purpose. I have recently visited LGV & PCV test centres lacking these safety features and reported the following to the DCDE:

- **Sites Requiring Gravel Pits.** Culham, Exeter, Ipswich and Sheffield require gravel pits to be constructed; Culham is particularly hazardous as the braking exercise is currently conducted outside DSA property on a road used by other vehicles and pedestrians.
- **Sites Where Gravel Pits Are Not Used.** At Chiseldon and Reading the braking exercise does not currently take place towards existing gravel pits. The exercise should be relocated at both sites to take advantage of these safety features.

## *DSA Generic Risk Assessment - LGV & PCV Tests*

- **Sites In Need Of Maintenance.** The gravel pit at Caernarfon had been compressed solid and therefore provides no safety. Poole and Rookley have overgrown gravel pits which currently appear to be effective, although further growth could render them useless.

- Remedial measures should be put in hand as soon as possible at all of these sites and any new LGV & PCV test centres should have suitable safety precautions designed in at the planning stage.

8.6. **Route Selection and Suitability.** Test routes are selected by LGV & PCV examiners and approved by SMs. Test centres are required to keep up-to-date details of each test route and appropriate hazard sheets (*SOP DT2 2.21*). As only 4 tests take place each day (*see paragraph 4.7, above*) routes are longer than car or motorcycle test routes and, particularly in rural areas, it is possible that an accident or the need to terminate a test on safety grounds could leave the examiner distant from the test centre with no means of contacting DSA management or colleagues. I recommend that SMs should assess the risk associated with each route and where risks are significant, and there are no other feasible control measures, DSA should consider issuing mobile telephones, if mobile telephone signal coverage permits and a suitable contact is available.

8.7. **On-Road Element.** The on-road elements of tests are described in *SOP DT1 3.35 – 3.52*. Examiners should be on the look-out for unsafe situations, should satisfy themselves that candidates recognise hazards in good time and should take appropriate action and, if necessary, either intervene in the interests of public safety or terminate tests in accordance with *SOP DT1 7.1 – 7.3*. The identification of test vehicle measurements solely in SI units in examiners' journals has possible safety implications. Road signs displaying width and height restrictions are often only in Imperial measurements and it is possible for an examiner to be confused or to misinterpret the dimensions of the test vehicle and thereby cause an accident. As an inexpensive precaution, I recommend examiners are provided with a simple SI / Imperial conversion table such as that shown in *DGV Part 2*.

8.8. **Uncoupling and Re-Coupling.** Candidates with articulated or trailer-drawing LGV are required to give practical demonstrations of uncoupling and re-coupling at the end of their tests; *SOP DT1 3.53 & 3.54* describe the procedures. It is essential that trailers are correctly coupled at the end of tests before proceeding on to public roads; this is particularly important in the circumstances described in the following paragraph. This, and other OHS points are covered during the 3<sup>rd</sup> week of examiners' initial training. After September 2003, candidates will be required to demonstrate they can park alongside their uncoupled trailers. This can be done by reversing into position or driving around the site and approaching their trailer from the rear. It is expected that most will do the former.

8.9. **Weather and Visibility.** SDEs are responsible, with SMs, for deciding if adverse weather would make tests unsafe and if necessary cancelling them (*SOP DT3 2.16*). Poor visibility during the last test of the day in winter months may make the end-of-test uncoupling and re-coupling exercises difficult to assess adequately, and might lead to unsafe situations. One Sector in Northern Area permits uncoupling and re-coupling to take place at the start of tests to make best use of ambient light in winter (*N Area SE DT Sector 4 Memo to All Examiners, DE/04/01 dated 18 October 2001*), with the proviso that examiners must make sure that outfits are safe to go on

## *DSA Generic Risk Assessment - LGV & PCV Tests*

public roads afterwards. I recommend that TSB or COB issues a *SOP* to this effect, or that Area Deployment Managers ensure that such "last tests" in winter months do not involve vehicles with trailers. I am, however, conscious that the PCS has strong views on this issue.

8.10. **Occupational Health & Safety Incident Reporting.** *SOP DT1 3.59* requires examiners to inform VOSA Station Managers of accidents on their sites, to inform Area Managers of accidents on DSA-owned sites and to notify the emergency services if required. In addition, DSA requires all OHS incidents associated with LGV & PCV testing to be reported without delay as described in *DSA H&S Advice Note 2/00* and *SOP DT1 Chapter 8*.

- To highlight any aspects of working practices requiring further management attention, and
- To provide evidence should the examiners involved subsequently have to make claims for industrial injury benefit. Failure to report OHS incidents at the time will result in them not being entered in Area accident books and details will therefore not be available to the DSS, resulting in claims being rejected.
- In order to encourage reporting, DSA has a "no blame" policy and report forms are not released to anyone outside the Agency.

### **Further Controls Necessary**

8.11. I believe the following additional controls are necessary to ensure that DSA controls the risks associated with test conduct and routes as far as is currently reasonably practicable.

8.12. **Simulated Loading Bay.** Carry out a risk assessment of the augmented LGV test simulated loading bay when TSB has decided on the final design. **Action: OHS Unit, Chief Driving Examiner.**

8.13. **Braking Strip Safety.** I recommend the following actions take place as soon as possible:

- The braking exercise at **Culham** is moved back on to the manoeuvring area and off the road used by the public.
- Gravel pits are constructed at **Culham, Exeter, Ipswich and Sheffield.**
- The braking exercises at **Chiseldon** and **Reading** are re-aligned with the existing gravel pits.
- The compressed gravel pit at **Caernarfon** is restored and local action is taken to ensure it is not crossed by vehicles on site.
- The vegetation in the gravel pits at **Poole** and **Rookley** is removed.

## ***DSA Generic Risk Assessment - LGV & PCV Tests***

- All LGV & PCV test centres are inspected by SMs and faults such as overgrown or compressed gravel pits are reported to Area Property Managers for rapid remedial action.
- I also recommend that braking strip safety requirements are built in to the plans for all new LGV & PCV test centres. **Action: Chief Driving Examiner, Estates Manager, Area Managers.**

8.14. **Terminating Remote Tests.** I recommend that SMs should assess the risks which may arise from routes where tests can be terminated at some distance from "civilisation" and take appropriate control measures to ensure examiners' safety; for example, where risks cannot be eliminated or controlled in some other way, Area Managers may consider providing a mobile phone for the test centre concerned, if signal strengths allow. **Action: Area Assistant Chief Driving Examiners, Area Managers.**

8.15. **Conversion Tables.** To prevent examiners unfamiliar with metric measurements misinterpreting test vehicle dimensions, I recommend simple SI/Imperial conversion tables are made available. **Action: Central Operations Manager.**

8.16. **Last Test of Day in Winter.** To reduce the risks caused by lack of light during the last test of each day during winter, I recommend the issue of a TSB or COB *SOP* permitting uncoupling and re-coupling exercises to take place at the start of such tests, as long as appropriate safety precautions are taken, **or** that Area Deployment Sections ensure vehicles with trailers are not booked for such tests. **Action: Chief Driving Examiner, Central Operations Manager, Area Managers.**

## **NON-TEST ELEMENTS**

### **Possible Hazards and Those at Risk**

9.1. A number of factors not directly associated with LGV & PCV testing could affect the OHS of the examiners involved. These are described below, together with the existing controls. I assess these risks to be currently LOW.

### **Existing Controls**

9.2. **Accommodation.** Officers in charge of DSA LGV & PCV testing accommodation are responsible, with Area Property Managers' assistance, for identifying and controlling local risks (*DSA H&S Advice Note 1/01* refers). Although many LGV & PCV test centres are on VI properties this does not absolve DSA from this responsibility. Area Property Managers should liaise with VOSA Property or Station Managers and agree who is responsible for any control measures required. Whatever the local arrangements, examiners must report dangerous situations on VOSA sites to both VOSA Station Managers and Area Property Managers without delay.

## *DSA Generic Risk Assessment - LGV & PCV Tests*

9.3. **Manoeuvring Areas.** Similar arrangements to those described in the preceding paragraph apply to manoeuvring areas and braking exercise test tracks. On sites shared with VOSA, such areas are usually but not inevitably the responsibility of VOSA Station Managers. Area Property Managers should therefore establish who is responsible at each shared LGV & PCV site and inform the examiners. Potential problems include potholes, obscured marking strips, hazardous spillages and snow & ice. The last 2 categories are covered by special instructions:

- **Oil and Other Hazardous Spillages.** Such spillages must be marked with a cone or cones by the examiners present (see *SOP DT1 3.65*), the fire brigade and police should be informed if spillages are significant, alternative internal routes should be signposted, Property Managers must be informed without delay and each situation must be monitored daily. *DSA H&S Advice Note 5/98* refers.
- **Snow and Ice Clearance.** COB's *DSA Snow and Ice Clearance Policy* requires Areas to have a separate plan for each location. On VOSA sites, that Agency will be responsible for clearance and DSA staff should not be involved unless the arrangement has been formally agreed in writing. Where DSA is responsible, COB's policy requires all volunteers to be provided with suitable equipment and given MH assessments. COB should ensure these requirements are being applied at all appropriate locations. Westfield tractors are available at many LGV & PCV test centres; the final week of examiners' initial training includes practical instruction on their use for snow clearance and distributing sand or salt (see also *SOP DT1 3.61 – 3.64*).

9.4. **Protective Clothing.** LGV & PCV examiners have an adequate scale of protective clothing provided under a contract arranged by COB with Lynben Ltd, consisting of:

- High visibility waistcoat (for wear with shirt-sleeves in summer),
- Jacket in fluorescent yellow with reflective strips (one of the 2 items above must be worn on manoeuvring areas at all times),
- Fleece jacket in which can be worn separately or zipped into the above,
- Over-trousers,
- Boots (2 varieties),
- Gloves,
- "Baseball cap" in navy blue, insulated and shower-proof.

### **Further Controls Necessary**

9.5. **Responsibilities for Local OHS Issues.** Area Property Managers should liaise with VOSA Property Managers or Station Managers to establish which Agency is responsible for office accommodation, manoeuvring area and braking strip OHS measures, and must inform examiners and their managers accordingly.  
**Action: Area Managers.**

9.6. **Snow and Ice Clearance.** I recommend COB ensures the requirements of its *DSA Snow and Ice Clearance Policy* regarding suitable equipment and MH training are being carried out at all appropriate LGV & PCV test centres. When this

## *DSA Generic Risk Assessment - LGV & PCV Tests*

has been completed, I consider DSA will have covered the risks arising from non-test elements as far as is reasonably practicable at present. **Action: Central Operations Manager, Area Managers, Training & Development Manager.**

### **RISK ASSESSMENT CONCLUSION**

10.1. This risk assessment concludes that some of the **major risks** associated with DSA's use of LGV & PCV have not been fully controlled, to the legally required extent of reasonable practicability. A few **lesser risks** also remain uncontrolled or not fully controlled as described above. The recommended additional controls and the senior managers responsible are described above and summarised in *Annex A*; the latter also shows recommended timescales. I believe that if these actions are not taken, individuals (both DSA employees and members of the public) could be placed at risk and the Agency could be vulnerable to legal action, either for failing to control the risks fully, and/or for compensation associated with any injuries or sickness caused as a result. In view of relatively high risks associated with LGV & PCV testing (*paragraph 1.3, above*), OHS Unit intends to monitor OHS incident reports and sickness absence in detail and bring any adverse trends to the OMT's attention so further appropriate remedial action can be taken.

10.2. Every LGV & PCV examiner has a legal responsibility to carry out all his or her actions to ensure both personal safety and the safety of all others who may be affected. This is an **absolute responsibility**, and as such is not subject to any considerations of reasonable practicability. In simple terms this means that all concerned should exercise reasonable judgement when carrying out testing and act in accordance with their training, briefing and the standing instructions for this working practice as laid down by DSA management.

10.3. Queries on this risk assessment should be directed to the managers responsible for each aspect, as shown in *Annex A*, or to the undersigned.

### **REDACTED SECTION 40 (2)**

### **REDACTED SECTION 40 (2)**

DSA Occupational Health and Safety Advisor  
Human Resources Team, Management Advice and Guidance  
City Gate House, NOTTINGHAM

3 April 2003

Annex:

A. Further Controls Recommended – Action Plan.

## *DSA Generic Risk Assessment - LGV & PCV Tests*

### **FURTHER CONTROLS RECOMMENDED – ACTION PLAN**

*ANNEX A*

<i>Serial</i>	<i>Action Recommended</i>	<i>Paras</i>	<i>Senior Manager Responsible</i>	<i>Target Date</i>
1	<p><b>Entering and Leaving LGV Cabs</b></p> <ul style="list-style-type: none"> <li>• Give additional emphasis to the dangers and safe methods during training courses.</li> <li>• Regularly remind examiners of both of these by TSB or COB <i>SOPs</i>.</li> </ul>	2.5 4.1 4.9	Training & Development Manager  Chief Driving Examiner, Central Operations Manager	By 1.5.03  By 1.7.03 and regularly thereafter
2	<p><b>Stress</b></p> <ul style="list-style-type: none"> <li>• Investigate the causes of the relatively high levels of LGV &amp; PCV examiner stress and take any remedial action necessary.</li> </ul>	2.7 4.7 4.10	Chief Driving Examiner, Human Resources Director	By 1.7.03
3	<p><b>Test Vehicles – Seat Belts</b></p> <ul style="list-style-type: none"> <li>• Require all test vehicles to have seat belts for examiners' use as soon as possible.</li> </ul>	2.6 7.4 7.11	Chief Driving Examiner, Policy Director  Chief Driving Examiner	By 1.4.04  By 1.5.03

## *DSA Generic Risk Assessment - LGV & PCV Tests*

3 <i>cont</i>	<ul style="list-style-type: none"> <li>Require examiners to use seat belts at all times whenever they are fitted.</li> <li>Amend <i>SOPs DT1/2/3</i> accordingly and cover in training courses.</li> </ul>		Chief Driving Examiner, Training & Development Manager	3 months
4	<p><b>Test Vehicles – Vibration</b></p> <ul style="list-style-type: none"> <li>Ask HSL to measure vibration levels on a sample of test vehicles and invite HSE to include DSA in their LGV vibration study.</li> <li>Consider how LGV &amp; PCV with excessive vibration can be excluded from tests.</li> <li>Issue an MTV standard to ensure such vehicles are no longer acceptable on test.</li> <li>Amend <i>SOPs DT1/2/3</i> accordingly and cover in training courses.</li> </ul>	2.6 7.5 7.12	<p>Chief Driving Examiner</p> <p>Chief Driving Examiner, Policy Director</p> <p>Chief Driving Examiner, Policy Director</p> <p>Chief Driving Examiner, Training &amp; Development Manager</p>	<p>By 1.5.03</p> <p>By 1.4.04</p> <p>By 1.4.04</p> <p>By 1.10.03</p>

## DSA Generic Risk Assessment - LGV & PCV Tests

5	<p><b>Test LGV Seating</b></p> <ul style="list-style-type: none"> <li>• Implement recommendations in OHS Advisor's <i>Risk Assessment of the Use of 3rd Seats by DSA Staff</i> dated 6/9/2000.</li> <li>• Ensure examiners have the right to tell all managers conducting check tests where <i>they</i> should sit, rather than vice-versa.</li> <li>• Amend <i>SOPs DT1/2/3</i> accordingly and cover in training courses.</li> </ul>	2.6 7.6 7.13	<p>Chief Driving Examiner</p> <p>Chief Driving Examiner</p> <p>Chief Driving Examiner, Training &amp; Development Manager</p>	<p>By 1.5.03</p> <p>By 1.5.03</p> <p>By 1.7.03</p>
6	<p><b>Test PCV Seating</b></p> <ul style="list-style-type: none"> <li>• Develop MTV standards for safer seating in PCV presented for test, to include the requirement for seatbelts.</li> <li>• Amend <i>SOPs DT1/2/3</i> accordingly and cover in training courses.</li> </ul>	2.6 7.7 7.13	<p>Chief Driving Examiner, Policy Director</p> <p>Chief Driving Examiner, Training &amp; Development Manager</p>	<p>By 1.4.04</p> <p>By 1.4.04</p>

## *DSA Generic Risk Assessment - LGV & PCV Tests*

7	<p><b>Test Vehicles – Mirrors</b></p> <ul style="list-style-type: none"> <li>• Issue an MTV standard to ensure all LGV &amp; PCV presented for test have suitable mirrors for examiners' use.</li> <li>• Amend <i>SOPs DT1/2/3</i> accordingly and cover in training courses.</li> </ul>	7.8 7.15	<p>Chief Driving Examiner, Policy Director</p> <p>Deputy Chief Driving Examiner, Training &amp; Development Manager</p>	<p>By 1.4.04</p> <p>By 1.4.04</p>
8	<p><b>Simulated Loading Bay</b></p> <ul style="list-style-type: none"> <li>• Carry out a risk assessment of the new simulated loading bay when TSB has decided on the final design.</li> </ul>	8.4 8.12	<p>OHS Unit, Chief Driving Examiner</p>	<p>By 1.7.03</p>
9	<p><b>Braking Strip Safety</b></p> <ul style="list-style-type: none"> <li>• Ensure braking exercises at <b>Culham</b> are held on the DSA manoeuvring area rather than the adjacent non-DSA road.</li> <li>• Construct gravel pits at the end of the braking areas at <b>Culham, Exeter, Ipswich and Sheffield.</b></li> </ul>	8.5 8.13	<p>Chief Driving Examiner, Midlands &amp; Eastern Area Manager</p> <p>Area Managers, as appropriate</p>	<p>By 1.5.03</p> <p>By 1.7.03</p> <p>By 1.5.03</p>

## DSA Generic Risk Assessment - LGV & PCV Tests

<p>9 <i>cont</i></p>	<ul style="list-style-type: none"> <li>• Restore the <b>Caernarfon</b> gravel pit.</li> <li>• Clear the <b>Poole</b> and <b>Rookley</b> gravel pits of vegetation.</li> <li>• Ensure <b>all other</b> gravel pits are inspected for similar faults and restored as required.</li> <li>• Ensure braking strip safety requirements are included in the plans for all new LGV &amp; PCV test centres.</li> </ul>		<p>Wales &amp; Western Area Manager</p> <p>Area Managers, as appropriate</p> <p>Area Managers</p> <p>Estates Manager</p>	<p>By 1.5.03</p> <p>By 1.7.03</p> <p>Immediately</p>
<p>10</p>	<p><b>Terminating Remote Tests</b></p> <ul style="list-style-type: none"> <li>• Assess the risks which may arise on routes where tests could be terminated in remote locations.</li> <li>• Take appropriate control measures to ensure examiners' safety.</li> </ul>	<p>8.6 8.14</p>	<p>Area Assistant Chief Driving Examiners</p> <p>Area Managers</p>	<p>By 1.7.03</p> <p>By 1.7.03</p>
<p>11</p>	<p><b>SI / Imperial Conversion Tables</b></p> <ul style="list-style-type: none"> <li>• Provide simple SI / Imperial conversion tables for examiners unfamiliar with metric measurements.</li> </ul>	<p>8.7 8.15</p>	<p>Central Operations Manager</p>	<p>By 6.5.03</p>



## *DSA Generic Risk Assessment - LGV & PCV Tests*

14	<p><b>Snow and Ice Clearance</b></p> <ul style="list-style-type: none"> <li>• Ensure each LGV &amp; PCV test centre has an effective snow and ice clearance plan.</li>   <li>• Ensure each centre has appropriate snow clearing equipment.</li>   <li>• Ensure all volunteers for snow and ice clearance are appropriately trained.</li> </ul>	9.3 9.6	<p>Central Operations Manager</p> <p>Central Operations Manager, Area Managers</p> <p>Central Operations Manager, Area Managers, Training &amp; Development Manager</p>	<p>By 1.10.03</p> <p>By 1.10.03</p> <p>By 1.10.03</p>
----	--	------------	---	---

**RA LGV Test 2002 AnnA**