

Internal Audit Report

Safety of Council Operated Heavy Goods Vehicles (HGVs)

01 October 2024

PL2403

**Overall
Assessment**

**Limited
Assurance**

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This Internal Audit review was conducted for the City of Edinburgh Council under the auspices of an addition to the 2024/25 internal audit plan approved by the Governance, Risk and Best Value Committee in May 2024. The review is designed to help the City of Edinburgh Council assess and refine its internal control environment. It is not designed or intended to be suitable for any other purpose and should not be relied upon for any other purpose. The City of Edinburgh Council accepts no responsibility for any such reliance and disclaims all liability in relation thereto.

The internal audit work and reporting has been performed in line with the requirements of the Public Sector Internal Audit Standards (PSIAS) and as a result is not designed or intended to comply with any other auditing standards.

Although there are specific recommendations included in this report to strengthen internal control, it is management’s responsibility to design, implement and maintain an effective control framework, and for the prevention and detection of irregularities and fraud. This is an essential part of the efficient management of the City of Edinburgh Council. Communication of the issues and weaknesses arising from this audit does not absolve management of this responsibility. High and Critical risk findings have been raised with senior management and elected members as appropriate.

Executive Summary

Overall
Assessment

Limited
Assurance

Overall opinion and summary of findings

Review of the design and operating effectiveness of the Council's Heavy Goods Vehicles (HGVs) key safety processes and procedures provide limited assurance on the maturity of control environment to manage the driving risks associated with its HGV fleet. Limited assurance can be provided to confirm that HGV drivers and operational services consistently meet the compliance requirements as required in line with the Council's driving policy.

The following key areas for improvement have been identified to enhance HGV safety and compliance with the Council policy and [driving legislations](#):

- [Driving for the Council Policy](#), last reviewed six years ago, requires review and updating to align with the current driving practices; supporting procedures should be designed to comply with policy provisions, with key performance indicators established to monitor driving performance and trends
- minimum safety standards and technological features should be established for Council's HGV fleet, and these should be clearly defined in the Council's HGV procurement/lease programme
- pre-employment health and licence checks for all new and agency drivers must be completed before issuing employment offer letters to ensure optimum use of available resources and minimise service delivery impacts
- a defined process with clear roles and responsibilities should be introduced to ensure consistent management of HGV drivers Certificate of Professional Competence (CPC) and Driver Assessor training
- the functionalities of existing Fleet systems should be fully explored to address compliance risks and gain best value from system investments
- specific procedures and guidance on routes for busy areas and use of telematics should be developed for operational services to ensure policy directives are translated into action

- key themes and root causes from incident investigations and complaints should be systematically analysed and reported to improve management of recurring driving risks
- driving risks should be identified and recorded in the Fleet Services and Operational services risk registers and managed and monitored through the Council's risk management framework.









The Council's insurance providers conducted an external review in August 2021 to assess the Council's policy and arrangements for fleet and driver risk management. The findings of that external review were aligned to the findings noted in this audit report. The external review provided 31 recommendations on Health and Safety policy, responsibilities, culture; driver management; vehicle management; journey planning and risk assessment; and monitoring, incident and claims management.

Discussions with the Council's Insurance Services highlighted that there has been limited engagement with insurers who await a written update to communicate the progress in implementation of these recommendations. As a result, the insurers have scheduled an Operator Licence review due to take place in November 2024 to assess the current compliance levels. The outcome of this review may impact on the Council's fleet insurance premiums and potentially on the continuation/extension of the Council's Fleet Operator's Licence.

Given the safety risks highlighted in this report, Internal Audit has recommended that management reconsider the introduction of alcohol and drug testing. Management is seeking guidance from the Governance, Risk and Best Value Committee on this recommendation, as a previous proposal for testing was declined by the [Policy & Sustainability Committee in November 2023](#), noting that 'drug and alcohol testing would not ever be reviewed unless a motion requesting such a review was passed at full council or there was a legal requirement to do so'.

Audit Assessment

[See Appendix 1 for Control Assessment and Assurance Definitions](#)

Audit Area	Control Design	Control Operation	Findings	Priority Rating
1. Policy and Governance			Finding 1 – Driving policy, procedures, and performance monitoring	High Priority
2. Vehicle Safety			Finding 5 – Operational HGV Safety Controls	High Priority
3. Driver Safety		N/A	Finding 2 – Pre-employment driver health and licence checks	High Priority
			Finding 3 – HGV drivers training	Medium Priority
			Finding 4 – Fleet system functionality	Medium Priority
4. Operational Safety		N/A	Finding 5 – Operational HGV Safety Controls	High Priority
5. Risk Management			Finding 6 – Incident and complaint management and monitoring	Medium Priority
			Finding 7 – Risk management	High Priority

N/A - controls not tested due to inadequacy of design

Background and scope

At the Governance, Risk and Best Value (GRBV) meeting held in [May 2024](#), members approved a [motion](#) requesting an addition to the 2024/25 audit plan, to include a review of the safety precautions adopted by the Council to ensure safety of the heavy goods vehicle (HGV) fleet, and whether Council employed HGV drivers meet the requirements for driving such vehicles. The motion was in response to a tragic incident within Edinburgh involving a commercial HGV which resulted in the death of a child, and a number of high-profile cases across the country. This audit will be conducted in line with the [motion](#) and subsequent discussions held at [Full Council](#), [GRBV Committee](#), and [Transport and Environment Committee](#) meetings.

The Council operates around 1,300 fleet assets, of which approximately 210 weigh above 3,500 kg, which are considered HGVs for the purposes of its operator license.

Despite a general downwards trend in the number of reported collisions by Transport Scotland, which publishes annual [Scottish Transport Statistics](#), a number of high-profile HGV collisions have been recorded in Scotland which resulted in serious injury or fatality. These have involved both commercially and publicly owned HGVs. Several safety technologies are available which enhance the operation of HGVs in built-up urban areas, however due to the varying age of the Council's current fleet, not all vehicles have these installed.

The Finance and Resources Committee approved a [fleet replacement programme](#) in November 2023 which captured the intended replacement of all truck mounted vehicles operating within the fleet, including refuse collection vehicles.

Scope

The objective of this review was to assess the adequacy of design and operating effectiveness of the key controls established to ensure the Council's HGV fleet is safe for other road users, and that drivers meet all requirements for driving such vehicles.

Alignment to Risks and Business Plan Outcomes

This review provides assurance in relation to the following Corporate Leadership Team (CLT) risks:

- Health and Safety (including public safety)
- People
- Regulatory and Legislative Compliance
- Reputational
- Financial and Budget Management.

[Business Plan Outcomes:](#)

- Outcome 13 Improved safety and wellbeing for vulnerable citizens
- Outcome 14 Core services are maintained or improved

Limitations of Scope

The following areas were excluded from scope:

- safety of Council operated vehicles weighing under 3,500 kg
- controls/requirements for drivers of vehicles weighing under 3,500 kg.

Reporting Date

Audit work concluded on 17 September 2024, and the audit findings and opinion are based on the conclusion of our work as at that date.

Findings and Management Action Plan

Finding 1 – Driving policy, procedures and performance monitoring

Finding
Rating

High Priority

Policy

The [Driving for the Council policy](#) (the policy) was approved by the Finance and Resources Committee in December 2018. It includes a standard statement on review stating that the policy should be reviewed as an when a change is deemed necessary, there are organisational changes, or changes to legislation/government policy.

The policy has not been reviewed since its initial approval in 2018 and Internal Audit's review noted gaps in the policy, as it does not:

- include references to the [Driving for the Council - Telematics Policy](#)
- include the Council practice to not allow the drivers to drive under [Section 88 of the Road Traffic Act 1988](#), which allows drivers meeting certain criteria to drive while their renewal application is pending
- reference the Council's priorities and environmental commitments such as the [Council Emissions Reduction Plan](#).

Additionally, audit discussions highlighted that the following provision of the policy is no longer applied as the vehicle suppliers have advised against it:

- Employees who are HGV passengers, will receive basic training on the operation of HGV vehicles, relating to the steering and braking mechanisms of the vehicles.

The audit also highlights an inconsistent approach across services in complying with the provisions of the policy, such as

- responsibility for supervision of the HGV safety checks required to confirm vehicles are safe before they are driven each day
- responsibility for administering HGV driver CPC training (finding 3)
- responsibility for performing HGV driving risk assessments and identifying, recording and managing driving risk (finding 7)
- monitoring of tachograph downloads every 28 days (finding 4).

Procedures

There are no documented Standard Operating Procedures in relation to driving or compliance with the policy for the Fleet Compliance team or operational services.

Performance Monitoring

The policy requires Heads of Services to ensure that there is a system for monitoring driver performance through performance indicators and identify any trends; and Executive Directors and the Chief Executive are required to monitor driver and fleet related incident rates and performance indicators.

Management have confirmed that no performance monitoring procedures and controls have been designed to monitor and report the performance of drivers or fleet services, identify trends and compliance to the policy, and inform decision making.

Risks

- **Financial and Budget Management** – lack of policies and procedures with poor controls leading to increased costs of insurance premiums, decrease in claims defensibility and potentially invalidated insurance policy
- **Health and Safety (including public safety)** – increased risk of incidents for drivers, passengers and other road users
- **People** – unclear roles and inconsistent processes impacting efficiency, accountability, training, and succession planning
- **Regulatory and Legislative Compliance** – potential non-compliance with [legislative requirements](#) and the requirements of the Council's HGV Operators Licence.
- **Reputational** – damage to the Council's reputation due to increasing complaints and incidents

- **Strategic Delivery** – driving risk may not be managed within the Council's risk appetite.

Recommendations and Management Action Plan: Driving policy, procedures and performance monitoring

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
1.1	<p>The Driving for the Council policy should be reviewed and updated to align with current practices to ensure it provides up to date and appropriate direction.</p> <p>The updated policy should be approved by Fleet Services, Human Resources and the relevant executive committee. The draft version of the policy should also be consulted with the fleet insurers.</p> <p>The policy should be scheduled for regular review and update at a predefined frequency to ensure it remains updated and accurately reflects roles, responsibilities and requirements to drive for the Council.</p>	<p>Driving for the Council policy will be reviewed and updated to align with current practices.</p> <p>The updated policy will be approved by relevant Service Areas and Policy and Sustainability Committee.</p> <p>The Policy will be reviewed annually and reported to the Policy and Sustainability Committee for their approval.</p>	Interim Executive Director of Place	<p>Head of Operational Support, Performance and Improvement</p> <p>Fleet and Workshops Manager</p>	30/11/2025
		<p>Agreed, An HR assurance statement is presented to the Policy and Sustainability Committee annually. The assurance statement confirms which HR policies will be reviewed in the next financial year and HR will confirm to Committee that the Driving for the Council will be reviewed during 2025/26.</p>	Executive Director of Corporate Services	<p>Service Director, Human Resources</p> <p>Head of Human Resources</p>	<p>20 April 2025 (for assurance statement)</p> <p>31 March 2026 (for policy review and update)</p>
1.2	<p>Standard Operating Procedures for key driving roles and responsibilities should be established and documented for second-line functions such as the Compliance team, and consistently implemented across first-line operational services. These should be regularly reviewed and updated to reflect changes to the process and confirm alignment to the driving policy and legislation.</p>	<p>The roles and responsibilities of drivers within the current policy will be reviewed and updated to include the responsibilities of the fleet compliance team and Service Managers.</p>	Interim Executive Director of Place	Head of Operational Support, Performance and Improvement	28/06/2025

1.3	A performance monitoring framework should be established with key performance indicators (KPI) for drivers, first line operational teams and second line functions within Fleet Services team. The framework should include monitoring of performance against KPIs and reporting of performance to senior management and relevant governance forum/committee.	<p>In addition to the 6-monthly accident report a framework of KPI's will be setup and established for the following areas:</p> <ul style="list-style-type: none"> - Gate check and spot checks of vehicles - Driving assessments completed. - Vehicle inspection audit - Driving infringements. 		Fleet and Workshops Manager	31/03/2025
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Finding 2 – Pre-employment driver health and licence checks

Finding
Rating

High Priority

The Driving for the Council policy requires managers to ensure completion of pre-employment health and licence checks before employment is offered to any candidate for the driving role.

Fitness to Drive: Recruiting managers must ensure that appropriate fitness to drive checks have been completed with the Council’s Occupational Health provider prior to issuing offer of employment to any candidate for driving role. They must also ensure that all new HGV drivers have provided a GP letter confirming their fitness to drive, before any candidate is appointed to a driving role. HGV drivers over 45 years of age are required to go through a medical check every five years, increasing to annual medical checks for HGV drivers over the age of 65.

Management have confirmed in audit discussions that the relevant services do not have consistently applied processes and procedures to arrange and conduct these health/fitness to drive checks for new driving candidates or existing drivers. There is a reliance on candidates/colleagues to disclose any medical conditions impacting their ability to drive.

Licence Checks: Management have confirmed that formal licence and permit checks for candidates appointed to driving roles are not performed until the candidate has joined. The newly appointed candidates are often placed on other non-driving roles, until these licence checks are completed.

Agency Staff: The policy also requires line managers to ensure completion of health and licence checks for agency drivers, but the Council does not have any established procedure and control to verify the completion and accuracy of licence/health checks processed by third-party agencies for their drivers.

Issues related to driver health and licence checks have been previously raised in the [2018 Council wide Drivers Health and Safety Audit](#), [2019 Findings only audit on the completion of driver licence checks](#), and the annual [follow up validation audit reported in April 2024](#).

Risks

- **Health and Safety (including public safety)** – undisclosed and unmonitored medical conditions increasing the risk of potential incidents
- **People** – recruitment inefficiencies leading to scheduling and resourcing challenges
- **Service Delivery** – services impacted due to drivers working in non-driving roles whilst waiting for completion of licence checks
- **Regulatory and Legislative Compliance** – potential non-compliance with [legislative requirements](#) and the requirements of the Council’s HGV Operators Licence
- **Reputational** – damage to the Council’s reputation due to increasing complaints and incidents
- **Strategic Delivery** – driving risk may not be managed within the Council’s risk appetite
- **Financial and Budget Management** – lack of controls around pre-employment health and fitness checks leading to increased costs of insurance premiums, decrease in claims defensibility and potentially invalidated insurance policy.

Recommendations and Management Action Plan: Pre-employment driver health and licence checks

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
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2.1	The Recruitment and Onboarding team within Human Resources should mandate provision of evidence to demonstrate satisfactory completion of fitness to drive health checks and licence checks before an unconditional offer of employment letter is issued to any candidate being appointed to a driving role.	Agreed - A reminder will be issued to the HR Onboarding team confirming that where a driver is being onboarded the recruiting manager must confirm that the appropriate checks with Fleet have been completed. For HGV drivers this should also include confirmation from the candidate their GP about their fitness to drive.	Executive Director of Corporate Services	Service Director, Human Resources Head of Human Resources Lead Consultant, Employee Life Cycle and Reward	31/01/2025
2.2	Recruitment resources for managers should be updated with guidance to support completion of the required pre-employment driver health and licence checks.	Risk Accepted – To ensure there is only ever 'one version of the truth' for managers to follow, the recruiting manager guidance includes several links to other guidance on the Orb. This approach ensures that managers are following the latest guidance and reduces the risk of errors. The onboarding requirements are clearly outlined in both the Driving for the Council Policy and a guidance.			Not applicable
2.3	Fleet Services should receive confirmation and evidence of pre-agreed health and licence checks from the third-party agencies before agency drivers are permitted to drive Council vehicles. Fleet Services should also explore the option to link the approval of agency PO and/or invoice with the health and licence checks evidence.	Fleet Services will work with HR colleagues to explore the option to link the approval of agency PO and/or invoice with the health and licence checks evidence.	Interim Executive Director of Place	Head of Operational Support, Performance and Improvement Fleet and Workshops Manager	28/02/2025
2.4	Fleet Services should introduce a quality assurance process to periodically review and report compliance of health and licence checks for a sample of new, existing and agency drivers.	A system will be devised either through E consent or supported on the reissue of a D906 to confirm that a driver has no known medical changes preventing them from driving.			28/02/2025

Finding 3 – HGV drivers training

Finding
Rating

Medium
Priority

Driver Certificate of Professional Competence (CPC) training

Professional drivers are required to have a [Driver Certificate of Professional Competence \(CPC\)](#) to drive an HGV in the UK and can be fined up to £1,000 for driving professionally without a Driver CPC. Drivers must complete 35 hours of periodic training every five years to receive and maintain their CPC.

The Council administers and bears the cost of CPC training, but Internal Audit review noted that there is no established framework and supporting procedures to accurately record, regularly monitor and periodically confirm the completion of HGV drivers CPC training. There are inconsistent manual approaches with the Learning and Development (L&D) team maintaining the CPC training records and administering on behalf of HGV drivers for one service, while other services monitor and administer completion of CPC training themselves for their drivers.

There was a backlog of CPC training as the Council's training supplier had paused provision of training due to Covid restrictions in April 2020 until April 2022. Additionally, the Place L&D team stepped in to address gaps in CPC training monitoring, however manual excel records for drivers CPC training were noted to be incomplete. Consequently, CPC for many HGV drivers were scheduled to expire in September 2024. Fleet Services and Place L&D developed a plan in January 2024 to update the CPC training records for HGV drivers. Following completion of audit fieldwork, it was confirmed that all HGV drivers with CPC expiring in September 2024 have now completed their 35 hours training. It is difficult to provide assurance on the currency of driver CPC during April 2020 to August 2024, as the monitoring controls were inadequate.

Analysis of the available CPC training records highlight that the Council's 105 out of 194 drivers (including agency drivers) in a sample of two depots had their CPC expiring in September 2024. While the 35 hours CPC training requirement is spread over a five-year period, these 105 drivers spent 349 man-days in the first six months of 2024 to complete their training. Management has advised that there was no impact to service delivery, as

more than 75% of the drivers have not been contracted to work on Mondays and most of these trainings were completed on a Monday.

Driver Assessor training

Driver assessor training is a standard industry practice and is required by the Council's policy for all new drivers. Assessment and coaching are provided in-house by the certified drivers. It aims to suggest improvements to enhance driving techniques and lower risk exposure.

The Council's driver assessor training was not delivered due to Covid restrictions between April 2020 until June 2024, as the certifications of in-house trainers (certified to provide assessor training) had expired. The training was reintroduced in June 2024, however audit discussions noted that all the relevant stakeholders are not yet aware of the training reintroduction. There is therefore lack of a joint process between Fleet and operational services to arrange and monitor driver assessor training for HGV drivers.

Risks

- **Financial and Budget Management** — poor driver training regime leading to increased costs of insurance premiums, decrease in claims defensibility and potentially invalidated insurance policy
- **Health and Safety (including public safety)** – increased risk of incidents for drivers, passengers and other road users
- **People** – training inefficiencies leading to resourcing/scheduling challenges
- **Service Delivery** – service delivery impacted due to lack of adequately trained drivers
- **Regulatory and Legislative Compliance** – potential non-compliance with [legislative requirements](#) and the requirements of the Council's HGV Operators Licence
- **Reputational** – damage to the Council's reputation due to increasing complaints and incidents

- **Strategic Delivery** – driving risk may not be managed within the Council's risk appetite

Recommendations and Management Action Plan: HGV drivers training

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
3.1	<p>A consistent procedure with clear roles and responsibilities should be documented and agreed with operational services and the Place L&D team to record, monitor and confirm the completion of CPC training for existing and newly appointed HGV drivers.</p> <p>The procedure should also include circulation of regular and timely reports to line managers with details of drivers with expiring CPC and completed training details.</p>	<p>A procedure will be put in place and the roles and responsibilities will be documented and agreed with operational services and the L&D (Place) team to record, monitor and confirm the completion of CPC training for existing and newly appointed HGV drivers.</p>	Interim Executive Director of Place	<p>Head of Operational Support, Performance and Improvement</p> <p>Fleet and Workshops Manager</p>	28/02/2025
3.2	<p>Evidence of accurate completed training records should be maintained, and management should explore the use of existing Council systems such as Vision to record and evidence the training and eliminate the data quality risk with manual excel spreadsheets.</p>	<p>The Vision/ Davis system will be updated and utilised going forward to maintain and monitor CPC training.</p>			28/02/2025
3.3	<p>The reintroduction of driver assessor training should be communicated to all services that operate HGV vehicles.</p>	<p>Fleet Compliance manager to communicate with service areas to identify any gaps in driver assessors and provide training as required.</p> <p>Fleet Compliance Manager will define when driver assessor training is required.</p>		<p>Head of Operational Support, Performance and Improvement</p> <p>Fleet and Workshops Manager</p> <p>Fleet Compliance Manager</p>	31/03/2025

Finding 4 – Fleet system functionality

Finding Rating	Medium Priority
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Fleet Services operate following three systems for managing driving permits:

- **Tranman** is used to record driver data and manage driving permits
- **Vision** is a compliance system used to monitor driver working hours and breaks
- **Davis** is integrated with the Driver and Vehicle Licensing Agency (DVLA) and automates routine license checks.

Internal Audit noted that these systems are not used to their full functionality. These systems can be used to assist the Council's fleet services and operational services with driving risk management, pro-active management of upcoming driver actions such as HGV licence renewals, monitoring training, and managing compliance with aspects of the driving policies and legislation.

Davis licence checking system

The Davis licence checking system is configured to automate HGV driver license checks every 3 months but includes following system limitations:

- the system assesses the risk associated with each driver, but this functionality is not currently used
- automated system emails are sent to the Fleet Compliance team and they review individual reports, but risk is not monitored across teams/services and the Council
- the system has the functionality to flag upcoming actions for drivers and managers to proactively manage compliances such as licence renewals, training completion or expiring permits. However, these system notifications are currently not configured for operational service managers.

Vision fleet management system

The Vision fleet management system is used to record and track vehicle and driver compliance with the [Road Transport \(Working Time\) Regulations 2005](#) and the [Drivers' Hours and Tachographs \(Amended etc.\) \(EU Exit\) Regulations 2019](#). A 'Driver Upload - Compliance Status by Driver' report is issued to the services on a weekly basis and it lists drivers who have not

downloaded tachograph data within the 28-day legislative requirement. As at 26 August 2024, 32 non-compliant tachograph cards were reported with 8 non-compliant for more than 56 days, and a maximum for over 138 days.

The Vision system has the functionality to provide alerts and reports to operational services to help them assess driver compliance with driving hours, breaks, and other compliance metrics. However, the system is not fully configured with the tools available to assist operational services drivers and managers complete their driving responsibilities.

Data Quality

There are no processing and monitoring controls such as reconciliation among the systems to obtain assurance over the completeness and accuracy of data across all the systems. The audit also noted minor data quality issues such as permit reference numbers being missing or reference to long-term sickness not being removed when driver permits are reactivated after a return to work. There are also concerns around the compliance of Tranman system with the Council's data protection and UK GDPR requirements as the access to Tranman system provides all users with unrestricted access to all the information including sensitive and personal information in incident reports.

Risks

- **Health and Safety (including public safety)** – increased risk of incidents for drivers, passengers and other road users
- **Service Delivery** – reliance on manual controls which increases the risk of error or omission
- **Regulatory and Legislative Compliance** – potential non-compliance with [legislative requirements](#) and the requirements of the Council's HGV Operators Licence
- **Financial and Budget Management** – under-utilisation of fleet systems and noncompliance with legislative requirements leading to increased

insurance premiums, decrease in claims defensibility and potentially invalidated insurance policy

Recommendations and Management Action Plan: Fleet system functionality

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
4.1	<p>The risk assessment and upcoming driver flag functionality of the Davis system should be explored to confirm if the issues related to exemptions and complex licences are due to functionality or configuration.</p> <p>Where configuration allows, system controls should be used to manage risks and inform decision making.</p>	<p>The risk system is switched on within the Davis System but there are limitations relating to the exemptions. Solutions will be explored with the supplier and actions supplied. Follow up dates will be provided for IA.</p>	Interim Executive Director of Place	Head of Operational Support, Performance and Improvement	28/02/2025
4.2	<p>Where appropriate:</p> <ul style="list-style-type: none"> • training should be provided to users of the systems to ensure the reporting functionality fully utilised and is used to monitor compliance and manage driver risk within services. • where services do not have access to systems (e.g. Davis), processes to report upcoming actions and monitor compliance from services should be designed and implemented. 	<p>The Compliance Manager will engage with Information Governance colleagues to understand any issues with granting managers access to the driving licencing system.</p> <p>Dependant on the above training to be provided to managers in order for them to monitor compliance on driving licencing within the system.</p>		Fleet and Workshops Manager	31/03/2025
4.3	<p>System data validation controls should be reviewed and incorporated into processes to ensure the quality of data within Fleet systems.</p>	<p>Validation control is currently reconciled on a bi-monthly basis. Reconciliation to be reduced to monthly.</p>			31/12/2024
4.4	<p>A review of the systems used by Fleet should be carried out to confirm compliance with UK GDPR requirements. Alternative options to store sensitive and personal information should be explored if there are limitations in the system to comply with the data protection legislations.</p>	<p>Fleet will work with colleagues in Information Governance Team to understand the GDPR requirements and review Tranman to ensure compliance. Alternatives will be explored if required.</p>			28/02/2025

Finding 5 – Operational HGV Safety Controls

Finding
Rating

High Priority

HGV Safety Standards

The Council's driving policy requires Council's purchased/leased HGVs to be 'fitted with Advanced Emergency Breaking System (AEBS), whenever it is reasonably practicable to do so'. However, Internal Audit noted that the Council does not have an established minimum safety standard, including features and technology requirements, for its existing fleet and new HGVs.

Additionally, the [Fleet Asset Management Plan 2023-2029](#) also did not include any safety standards for the future fleet of HGVs to be sourced for next five years.

Routing

HGV drivers are expected to avoid driving in high-risk areas at peak times, however Internal Audit noted that there are no specific procedures or guidance to support drivers to achieve this requirement e.g. listing of high-risk areas, intimation of peak times for different areas and the alternative route options.

Management have confirmed that digital solutions are available, and they are currently being explored to improve route planning for HGVs, with features such as digital ringfencing within maps of high-risk areas at peak times to alert drivers to change route.

Telematics

The [Driving for the Council - Telematics Policy](#) was agreed by the Policy and Sustainability Committee in May 2023. The policy aims to reduce driving incidents, improve driving behaviour, reduce exposure to high risk driving situations, and optimise routes.

While data access controls have been introduced to restrict access to telematics data, but there is no routine processing or analysis of thematic level telematics data to monitor driving standards and exposure to risk, or to inform training requirements for specific teams and HGV drivers.

Finding 1 also highlighted the lack of driving related performance measures in services, and as a result it has not been possible to confirm if the objectives of Telematics policy are achieved.

Drug or alcohol consumption while driving

[Driving for the Council policy](#), [Alcohol and drugs policy](#) and [Alcohol and drugs policy user guide](#) prohibits the use of alcohol and drugs while driving Council vehicle or private vehicle driven on Council business. The policy requires the managers to observe and record suspected behaviours, have a discussion with the concerned colleague, and take actions to send colleagues home or involve Police/HR services, when the managers 'reasonably believe' that the colleague is under the alcohol or drug influence.

Audit discussions with the Council's Fleet and Operational services have highlighted strong concerns around the potential use of alcohol or drugs while driving for the Council, but there are no evidence-based procedures e.g. random or 'with cause' drug/alcohol testing to deal with suspected instances. Managers expressed reservations to allege colleagues for alcohol/drugs consumption at work, based only on suspected behaviours, and they are unable to take concrete actions where the concerned colleagues deny the consumption.

The 2021 external review by insurers recommended to introduce testing for drugs and alcohol abuse and it has also been adopted in a few other Scottish local authorities.

The Council's [Policy and Sustainability Committee](#) approved the new drugs and alcohol policy on 23 May 2023 and noted that 'drug and alcohol testing at work was invasive and unnecessary.' The Committee also resolved that 'drug and alcohol testing would not ever be reviewed unless a motion requesting such a review was passed at full council or there was a legal requirement to do so'.

Risks

- **Health and Safety (including public safety)** – increased risk of incidents for drivers, passengers and other road users
- **People** – challenges with scheduling, resourcing, and staff morale
- **Service Delivery** – potential service delivery disruptions due to inefficient routing of the vehicles and operational service delivery impacted due to routing inefficiencies and incidents due to consumption of alcohol or drugs

Risks (continued)

- **Regulatory and Legislative Compliance** – potential non-compliance with [legislative requirements](#) and the requirements of the Council's HGV Operators Licence
- **Reputational** – damage to the Council's reputation due to increasing complaints and incidents
- **Financial and Budget Management** – lack of operational safety controls leading to increased costs of insurance premiums, decrease in claims defensibility and potentially invalidated insurance policy.

Recommendations and Management Action Plan: Operational HGV Safety Controls

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
5.1	Fleet Services, in consultation with other relevant Council departments, should establish safety standards, including technology features, for its HGV fleet. These standards should also be integrated into the procurement/lease programme of Council's future fleet.	Specifications for all new vehicles contain reference to safety features. A stand-alone document detailing this will be produced and approved by the Fleet Renewal Programme Board. This will also be documented in the updated Driving for the Council Policy.	Interim Executive Director of Place	Head of Operational Support, Performance and Improvement Fleet and Workshops Manager	31/01/2025
5.2	The Council should consider if a digital solution is available to assist with the routing of HGVs which will allow high-risk areas to be defined and vehicles to be re-routed at peak times to avoid such areas. Alternatively, manual procedures with clear instructions to avoid busy routes, along with alternate routes, should be provided to HGV drivers.	Specification for in-cab replacement system will include the ability for the driver to be alerted to any route specific hazards and the ability to create prohibited areas at certain peak times. Technical specifications of the in-cab solution would be consulted with the Council's digital services and/or external provider to assess its suitability with the Council's hardware and software infrastructure, particularly the iOS server.		Service Director, Operational Services Head of Neighbourhood Environmental Services	31/07/2025

5.3	Operational services should design controls which utilise telematics data to monitor driving performance for their area, identify themes and target training requirements for teams or vehicle drivers.	Operational services will design controls which utilise telematics data to monitor driving performance for their area, identify themes and target training requirements for teams or vehicle drivers.			28/02/2025
5.4	Interim Executive Director of Place and Service Director, Human Resources should present a joint report to elected members to reconsider alcohol and drug testing for HGV drivers, referencing the findings of this audit and findings of the insurers' review of the Council's Operator Licence compliance, scheduled for November 2024.	<p>At its meeting on 23 May 2023, the Policy and Sustainability Committee approved the following motion:</p> <ol style="list-style-type: none"> 1) To approve the new Alcohol and Drugs Policy. 2) To note that this policy had been reviewed and revised to address the recommendations agreed following the Independent Inquiry and Whistleblowing Culture Review by Susan Tanner QC, with Pinsent Mason in 2021. 3) To note that drug and alcohol testing at work was invasive and unnecessary. 4) To therefore resolve that, in contrast to paragraph 4.7 of the report by the Executive Director of Corporate Services, drug and alcohol testing would not ever be reviewed unless a motion requesting such a review was passed at full council or there was a legal requirement to do so. <p>Guidance to be sought from GRBV on next steps as a result of audit recommendations and previous Committee decision.</p>	<p>Interim Executive Director of Place</p> <p>Executive Director, Corporate Services</p>	<p>Interim Executive Director of Place</p> <p>Service Director, Human Resources</p>	31/10/2025

Finding 6 – Incident and complaint management and monitoring

Finding
Rating

Medium
Priority

Incidents investigations and monitoring

Incidents are investigated by the individual operational services. Fleet Services are not involved in the incident investigation process but are provided with the incident report following investigation for oversight and recording to the Tranman system.

Internal Audit noted that a six-monthly Fleet Incident Analysis report providing a high-level summary of incidents across the fleet categorised by type of incident, directorate involved, age of driver involved in the incident, third party or Council fault, is presented to the Council's Health and Safety Group.

However, the report is not adequately detailed to monitor and analyse the Council wide incidental investigation data by:

- classification of incidental vehicles between HGVs and non-HGVs
- categorisation of the impact of incidents i.e. fatal, serious and minor
- breakdown of incidents by service area (as 93% of incidents related to one directorate)
- root cause/theme of the incidents and comparison with previous six-monthly periods to note trends and review the results of corrective actions taken during previous periods
- impact of the incidents including financial impact due to claims etc. and service delivery impact due to disruptions
- lessons learned from incident investigations to incorporate into new procedures or training to prevent repeated occurrences.

Thematic analysis of driving incidents can contribute to the ongoing improvement of driving standards, as well as compliance with the driving policy and legislation.

HGV Complaints

Complaints relating to Council vehicles and driving are referred directly to the relevant service area, provided this is identified by the original complaint.

Where a complaint is not specific, e.g. provides a registration number only, this is referred to Fleet Services to identify the vehicle, service area, and driver, before referring to the service for investigation.

However, there are no procedures and controls for the central oversight of complaints and analyse key themes of driving complaints for effective management of driving complaints and risks.

Risks

- **Financial and Budget Management** – absence of post incident analysis indicating lack of continuous monitoring leading to increased costs of insurance premiums, decrease in claims defensibility and potentially invalidated insurance policy
- **Health and Safety (including public safety)** – limited learning from incidents leading to repeat incidents
- **People** – lack of learning culture towards driving and safety
- **Service Delivery** – operational service delivery impacted by vehicles and drivers involved in incidents
- **Regulatory and Legislative Compliance** – potential non-compliance with [legislative requirements](#) and the requirements of the Council's HGV Operators Licence
- **Reputational** – damage to the Council's reputation due to increasing complaints and incidents
- **Strategic Delivery** – driving risk may not be managed within the Council's risk appetite.

Recommendations and Management Action Plan: Incident and complaint management and monitoring

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
6.1	The process for investigating incidents and complaints related to driving should be reviewed to ensure that all key stakeholders and services are adequately involved in the resolutions and lessons learned process.	The process for investigating incidents and complaints related to driving will be reviewed to ensure that all key stakeholders (including the Insurance team) and services are adequately involved in the resolutions and lessons learned process.	Interim Executive Director of Place	Head of Operational Support, Performance and Improvement	28/02/2024
		Business Support administrator will have access and training to LACHS system, used by insurance team to record all incidents, to improve captured information and GDPR compliance		Fleet and Workshops Manager	30/09/2025
6.2	The information presented in six-monthly incident reporting should be reviewed to confirm that there is sufficient detail to allow service areas to make informed decisions around driving standards. The report should be updated to include but not restricted to data points suggested in the finding and any further details or metrics as required by service areas or oversight groups to inform decision making and ongoing driving improvement.	The six-month incident reporting document will be reviewed. The report will be updated to report and analyse the following: <ul style="list-style-type: none"> - Classification of accident whether HGV or non-HGV - Categorisation of impact: serious, fatal, minor - Root cause of accidents. 	Interim Executive Director of Place	Head of Operational Support, Performance and Improvement	30/04/2025
				Fleet and Workshops Manager	
6.3	Fleet Services should consider including analysis and comparison of complaints data in the six-monthly incident reporting, to compile and analyse complaints, identify themes, share information amongst services, and inform training needs.	Fleet Services and Service areas will consider including analysis and comparison of complaints data in the six-monthly accident reporting, to compile and analyse complaints, identify themes, share information amongst services, and inform training needs.	Interim Executive Director of Place	Head of Operational Support, Performance and Improvement	30/04/2025

Finding 7 – Risk management

Finding Rating	High Priority
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Internal Audit noted that there are no established and embedded risk management procedures to manage driving risks such as driver behaviour, legal and regulatory compliance, health and safety, vehicle safety, insurance cover and costs. None of the Council, directorate or service risk registers captures driver and vehicle risks to manage them in line with the Council’s [Risk Management Framework](#).

Risk assessments to confirm that driving risks are routinely being considered were not completed for one of the key operational services, which uses the highest number of HGV drivers.

Risks





- **Financial and Budget Management** — inadequate risk management procedures leading to increased costs of insurance premiums, decrease in claims defensibility and potentially invalidated insurance policy
- **Health and Safety (including public safety)** – increased possibility of incidents impacting safety of drivers, passengers and other road users
- **People** – poor culture towards vehicle and drivers safety procedures
- **Service Delivery** – operational service delivery impacted due to limited identification, consideration and management of driver related risks
- **Regulatory and Legislative Compliance** – ability to comply with [legislative requirements](#) and apply the rules of the Councils HGV Operators Licence
- **Reputational** – damage to the Council’s reputation due to increasing complaints and incidents
- **Strategic Delivery** – driver risk may not be sufficiently identified, assessed and managed.

Recommendations and Management Action Plan: Risk management

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
7.1	Fleet Services should engage with the Council’s Risk Management team to implement the Council’s Risk Management Framework arrangements to identify, record, manage and monitor driving risks for the Council and its citizens.	Fleet Services will engage with the Council’s Risk Management team to implement the Council’s Risk Management Framework arrangements to identify, record, manage and monitor driving risks for the Council and its citizens.	Interim Executive Director of Place	Head of Operational Support, Performance and Improvement Fleet and Workshop Manager	31/01/2025

7.2	Operational services should complete regular risk assessments to confirm that driving risks are continually and adequately managed.	A list of standardised risk assessments will be developed and shared with service areas to adept and adopt to included driver risks.		Service Director, Operational services	30/04/2025
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Appendix 1 – Control Assessment and Assurance Definitions

Control Assessment Rating		Control Design Adequacy	Control Operation Effectiveness
Well managed		Well-structured design efficiently achieves fit-for purpose control objectives	Controls consistently applied and operating at optimum level of effectiveness.
Generally Satisfactory		Sound design achieves control objectives	Controls consistently applied
Some Improvement Opportunity		Design is generally sound, with some opportunity to introduce control improvements	Conformance generally sound, with some opportunity to enhance level of conformance
Major Improvement Opportunity		Design is not optimum and may put control objectives at risk	Non-conformance may put control objectives at risk
Control Not Tested	N/A	Not applicable for control design assessments	Control not tested, either due to ineffective design or due to design only audit

Overall Assurance Ratings	
Substantial Assurance	A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.
Reasonable Assurance	There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.
Limited Assurance	Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.
No Assurance	Immediate action is required to address fundamental gaps, weaknesses or non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited.

Finding Priority Ratings	
Advisory	A finding that does not have a risk impact but has been raised to highlight areas of inefficiencies or good practice.
Low Priority	An issue that results in a small impact to the achievement of objectives in the area audited.
Medium Priority	An issue that results in a moderate impact to the achievement of objectives in the area audited.
High Priority	An issue that results in a severe impact to the achievement of objectives in the area audited.
Critical Priority	An issue that results in a critical impact to the achievement of objectives in the area audited. The issue needs to be resolved as a matter of urgency.

Appendix 2 – Areas of Audit Focus and Control Objectives

Audit Areas	Control Objectives
Policy and Governance	<ul style="list-style-type: none"> • policies and procedures for the Council’s fleet (including HGVs and drivers) are in place, up-to-date, and accurately reflect the risk and control environment.
Vehicle Safety	<ul style="list-style-type: none"> • the fleet replacement programme has considered the use of technology (such as speed monitoring and limitation), to ensure the safety of all Council operated HGVs, ensuring all HGVs meet agreed upon safety standards • data from vehicle telematics is used to continually monitor and improve the safety of Council vehicles.
Driver Safety	<ul style="list-style-type: none"> • checks are performed both initially and ongoing to confirm that all HGV drivers have the necessary qualifications, licenses, medicals or other documentation required by their roles. Evidence of the checks performed is documented • HGV drivers are required to undergo appropriate training, which is maintained on an ongoing basis, and covers the safety requirements expected of HGV drivers, as well as any changes to legislation or operations as they are implemented. All training is recorded, and completion monitored regularly • HGV drivers working conditions are monitored to ensure they promote the safe operation of HGVs, such as use of tachographs, telematics, and feedback.
Operational Safety	<ul style="list-style-type: none"> • additional operational safety measures have been considered and implemented where appropriate, including but not limited to: <ul style="list-style-type: none"> ○ routing HGVs away from high-risk areas, such as schools and nurseries, at peak times ○ use of telematics and complaints data to monitor or flag poor driving standards ○ regular informal vehicle safety checks being carried out ○ regular formal servicing and maintenance of the HGV fleet.
Risk Management	<ul style="list-style-type: none"> • incident data is recorded and reviewed in a timely basis to identify and resolve issues with working conditions, the health and wellbeing of drivers, training requirements, or the maintenance of the fleet. Lessons learned are identified and shared as appropriate • risks related to Council operated HGVs are identified, recorded, and managed within a service risk register, and are regularly reviewed to ensure appropriate mitigating actions are in place and remain effective, with escalation to divisional and directorate level risk committees where required.

Appendix 3 – Legislation and Statutes relevant to Driving for the Council

- Road Traffic Act 1998 - covers road safety, licencing, and vehicle standards
- Operator Licensing (Goods Vehicles) Regulations - require fleet operators to hold an operators licence to run vehicles over 3.5 tonnes
- Drivers' Hours and Tachographs Regulations - set limits on driving hours, breaks, rest periods, and mandatory use of tachographs
- Corporate Manslaughter and Corporate Homicide Act 2007 - holds organisations accountable if gross management failures result in death which could include vehicle maintenance or driver negligence
- Highway Code - guidance on safe use of roads
- Road Vehicles (Construction and Use) Regulations 1986 - set out construction, weight limits, and use of vehicles on public roads
- Vehicle Excise & Registration Act 1974 - vehicle tax and registration
- Health and Safety at Work etc Act 1974 - health and safety obligations relevant to safety of/from HGV vehicles.