

The Highland Council

Agenda Item	7.
Report No	CP/8/25

Committee: Communities and Place

Date: 22 May 2025

Report Title: Fleet Traffic Commissioner Response

Report By: Assistant Chief Executive - Place

1 Purpose/Executive Summary

- 1.1 This report outlines the background of events that led to the requirement, following a Preliminary Hearing with the Office of the Traffic Commissioner for Scotland (OTC), to conduct an independent audit of the Council's fleet operations concerning compliance with the Heavy Goods Vehicle (HGV) Operating Licence.
- 1.2 This report also provides Members with an update on the progress of completing the Fleet Action Plan submitted to the OTC.
- 1.3 The action plan addresses various aspects of the Council's fleet operations, with most actions linked to the Council's Operating Licence, while some will impact all Council fleet users.
- 1.4 The action plan commits to conducting follow-up audits to assess progress. These audits must be completed by 31 August 2025 and 31 December 2025, with the outcomes and any subsequent action plans submitted to the OTC after each audit.

2 Recommendations

- 2.1 Members are asked to:-
 - i. **Note** the action plan as supplied to the Office of the Traffic Commissioner for Scotland; and
 - ii. **Note** the progress to date on implementing the action plan.

3 Implications

- 3.1 **Resource** – These requirements will be assessed in the coming months, within the available budgets. Updates to fleet management software and related changes will be accommodated within the existing fleet budgets.

- 3.2 **Legal** - The HGV fleet operation is regulated by the OTC who has considerable powers. The licensing provisions the Council must comply with can be found in the Goods Vehicles (Licensing of Operators) Act 1995, the Goods Vehicles (Licensing of Operators) Regulations 1995, the Road Transport Operator Regulations 2011.
- 3.3 **Risk** - Safe and effective management and operation of the HGV fleet is essential to complying with the Operator Licence. Non-compliance can ultimately result in the HGV fleet being taken off the road and/or a public inquiry. The action plan detailed in this report details the improvements to our operations to manage this risk.
- 3.4 **Health and Safety (risks arising from changes to plant, equipment, process, or people)** – Any changes to existing procedures will contribute positively to maintaining the safety of fleet operations.
- 3.5 **Gaelic** - There are no Gaelic implications arising from this report.

4 Impacts

- 4.1 In Highland, all policies, strategies or service changes are subject to an integrated screening for impact for Equalities, Poverty and Human Rights, Children's Rights and Wellbeing, Climate Change, Islands and Mainland Rural Communities, and Data Protection. Where identified as required, a full impact assessment will be undertaken.
- 4.2 Considering impacts is a core part of the decision-making process and needs to inform the decision-making process. When taking any decision, Members must give due regard to the findings of any assessment.
- 4.3 This is an update report and therefore an impact assessment is not required.

5 Background

- 5.1 An Operator's Licence (O licence) is the legal authority needed to operate goods vehicles in Great Britain. A licence is issued by the OTC for Scotland who are the independent regulator of the commercial road transport industry.
- 5.2 An organisation needs an O licence to operate vehicles above 3.5 tonnes gross vehicle weight (GVW) that are used to carry goods (i.e. anything not permanently attached to the vehicle) on public roads for trade or business purposes.
- 5.3 The OTC have powers to take regulatory action against a licence holder where they fail to meet the expected standards of operation. They can:-
- revoke or suspend a licence;
 - reduce the number of vehicles authorised on a licence.;
 - attach conditions to a licence restricting the weights of vehicles allowed to be used on a licence and/or their hours of operation; and
 - act against the transport manager(s) and senior management, particularly where serious infringements have been reported. Action can include declaring them unfit and invalidating their Transport Manager Certificate of Professional Competence (CPC).

- 5.4 In the event of an incident or breach of the licence requirements, the OTC will ask the most senior member of the organisation (known as the responsible person) and the Transport Manager(s) to attend a public inquiry before any action is taken against the licence.
- 5.5 In some cases, a Traffic Commissioner may act immediately (e.g. in the interests of public safety) and the inquiry will be held later.
- 5.6 The Council currently has a Service Lead for Transport and Logistics and two Compliance Officers. Each hold a CPC as a Transport Manager.
- 5.7 Although many members of the Council's Senior Management Team hold corporate responsibility for specific functions, Fleet staff members can be held accountable for the actions of Council staff and risk losing their CPC as Transport Managers, making them ineligible to continue in that role. They must also maintain their status as 'persons of good repute'.

6 The Purpose of an Operator Licence

- 6.1 The main purpose of goods vehicle operator licensing is to ensure the safe and proper use of goods vehicles to protect the public and to protect the environment around operating centres. The licensing provisions can be found in the Goods Vehicles (Licensing of Operators) Act 1995, the Goods Vehicles (Licensing of Operators) Regulations 1995, the Road Transport Operator Regulations 2011.
- 6.2 Licence OM0021134 has been issued to Highland Council on the understanding that it meets its legal obligations in relation to driver, vehicle, and operating centre compliance.
- 6.3 Performance against the O licence criteria is measured by the Operational Compliance Risk Score (OCRS). OCRS is used to calculate the risk of an operator not following the rules on roadworthiness (the condition of its vehicles) and traffic (e.g. drivers' hours, weighing checks).
- 6.4 Vehicles are more likely to be inspected if an organisation's OCRS is high. The score is a combination of two elements of performance:-
- Roadworthiness – This is about the condition of the vehicle, for example, Vehicle tests (first tests, subsequent annual tests); 'vehicle encounters' (fleet check inspections at operator premises, roadside inspections); and
 - Traffic Roadside inspections and prosecutions – This is about driver compliance, (for example, drivers' hours and tachograph offences, weighing checks)
- 6.5 The OCRS system is based on data collected by the Driver and Vehicles Standard Agency over a 3-year rolling period. Further information is available at:-

<https://www.gov.uk/operator-compliance-risk-score/how-the-system-works>

Currently Highland Council remain in the green area of the score matrix; which is considered low risk.

7 Organisational Responsibilities and Key Risk Areas

- 7.1 The Chief Executive was previously named on the O licence as a responsible person. However, following recent discussions it was agreed that to bring the responsible person closer to the operational aspects of the fleet it was decided to name the Assistant Chief Executive – Place as the responsible person, they must appoint suitably qualified Transport Manager(s) to operate this licence. The Licence is issued to the Service Lead, Transport and Logistics. Licence stipulations include:-
- the Transport Manager(s) must meet the good reputation requirement and be fit to hold a licence and ensure the transport operations are properly managed at all times;
 - appropriate financial standing (i.e. an organisation must have enough money to run its fleet operation);
 - facilities (or arrangements) for maintaining the vehicles; and
 - capability of ensuring that all staff obey all the rules of the O Licence.
- 7.2 The licence is renewed every five years. The Council's licence is due to be renewed in January 2026.
- 7.3 Currently the Traffic Commissioner has stipulated that Highland Council must have three employees holding a Transport Managers CPC listed on the licence. This stipulation is currently fulfilled by the posts of Service Lead; Transport and Logistics and two Fleet Compliance Officers.
- 7.4 The day-to-day operations of the vehicles on the O licence and drivers are managed by eight area operational managers, five in Roads and Transport, two in Amenities and two in Waste Services.
- 7.5 The Traffic Commissioner requires operators to have adequate systems in place to make sure, staff can obey all the rules, particularly covering:-
- speed limits;
 - driver obligations;
 - driver licensing/driver CPC;
 - drivers' hours rules and the Working Time Directive;
 - taxation and insurance of vehicles; and
 - authorised weights.
- 7.6 There is a requirement to have management structures, along with monitoring and reporting systems, in place to demonstrate to the Traffic Commissioner both current and ongoing compliance.
- 7.7 The Compliance Officers in the Fleet service cover three key areas – Workshop Compliance, Licence, and Driver Compliance, Light Fleet and Transition to Net Zero. Key aspects covered are listed below:-
- Workshop management;
 - Vehicle records;
 - Vehicle checks;
 - Driver checks;
 - Operating centres;
 - Licence management;

- Driver training and assessment;
- Accident notification and investigation;
- Drivers' hours;
- Fleet Procurement; and
- Transitioning the Fleet to meet Net Zero targets

7.8 The legal requirement is the same, irrespective of the size of operation, namely that the nominated Transport Manager(s) must be able to exercise continuous and effective control of the fleet and drivers.

7.9 The Traffic Commissioner has identified the following non-exhaustive list of the types of activity which might be expected of a Transport Manager. These are:-

- Drivers – Administration;
- Drivers – Management;
- Drivers – Operations; and
- Vehicle – Management

7.10 The Transport and Logistics Manager attends monthly operational managers meetings with Waste and Roads function to update them on changes to legislation or policies in relation to fleet operations. These operational managers are required to implement and monitor these changes.

8 Preliminary Hearing with the Office of the Traffic Commissioner for Scotland

8.1 In October 2023 the Council received a prohibition notice on a vehicle that was presented for an MOT due to it having loose wheel nuts. The fleet team immediately began an investigation into the reasons for the prohibition notice (PG9). The fault was rectified immediately, and the prohibition notice was lifted on the same day. Given the seriousness of the fault and a previous wheel loss incident in Lochaber in 2021, the DVSA, as they are entitled to do, determined that a more thorough investigation was required. This investigation covered all seven of the Councils' workshops and the outcome of the investigation was supplied by the DVSA to the OTC.

8.2 Following receipt of the DVSA investigations the OTC contacted Highland Council in April 2024 to ask that an independent audit be carried out into the Fleet operations of the Council. This audit was carried out in May 2024.

8.3 In May 2024 one of the Councils' vehicles on the O licence received a PG9 notice due to issues with suspension components. This vehicle was leased which included the maintenance of the vehicle. The Council immediately investigated the reasons for the notice and passed these to the DVSA.

8.4 In June 2024 the OTC issued a call up letter to the Council requesting attendance at a Preliminary Hearing to discuss the O Licence with the Deputy Traffic Commissioner for Scotland. As part of the Preliminary Hearing process an extensive array of documentation was provided to the OTC to support our case. The Council also engaged the services of a specialist lawyer to assist us in the preparation of the documents for submission.

- 8.5 The hearing was held via Microsoft Teams on 28 October 2024, attended by the Assistant Chief Executive – Place, the external lawyer, the Service Lead for Transport and Logistics, and the two Compliance Officers named on the O Licence. Following the hearing, the Council received a decision letter requiring a further in-depth audit of the entire fleet operation to be carried out by an independent third party by 28 February 2025. The Council was then required to submit an action plan based on the audit findings to the OTC within 14 days of receiving the audit.
- 8.6 The audit was conducted by Logistics UK during the week commencing 17 February 2025, and the audit report was received on 3 March 2025, with a summary is provided in **Appendix 1**.
- 8.7 The actions required from the audit were categorised into various levels of urgency and importance. The table below shows the number in each level and to which of the fleet users/operations these affect.

Timescale	Responsible	Category of Action & Number of Actions required		
		Essential	Urgent	Desirable
		1	2	3
A (Action within 1 month)	Workshops/Fleet	6	5	0
	Vocational Drivers	2	0	0
	All drivers	4	0	0
B (Action within 1-2 months)	Workshops/Fleet	2	3	0
	Vocational Drivers	0	1	0
	All drivers	2	0	0
C (Ongoing - Review every 3 months)	Workshops/Fleet	1	3	0
	Vocational Drivers	5	1	0
	All drivers	1	4	0
TOTALS		23	17	0

9 Highland Council Action Plan in response to the Audit

- 9.1 In response to the audit, a comprehensive action plan was prepared, as requested by the OTC and detailed in **Appendix 2**. This action plan was submitted to the OTC on Monday, 17 March 2025, in accordance with the decision letter.

10 Office of Traffic Commissioner response to Highland Council Action Plan

- 10.1 On 3 April 2025, the Council received a response from the OTC proposing additional undertakings to be completed in line with the submitted action plan, as shown in **Appendix 4**. The Council accepted these undertakings and provided the further requested information on 11 April 2025.

11 Progress on Implementing Action Plan

- 11.1 Progress on the action plan is shown in **Appendix 3**. Some actions have experienced a delay in being completed and these are highlighted.
- 11.2 As per the OTC undertakings further audits of the fleet operation have been scheduled. The first of these audits is take place in late July/early August 2025.

Designation: Assistant Chief Executive - Place

Date: 22 April 2025

Author: Andrew Hunter, Service Lead - Transport & Logistics
Debbie Sutton, Strategic Lead - Community Operations
and Logistics

Background Papers: CP/34/24 Operational Fleet Compliance, Policies and
Procedures

Appendices: Appendix 1 – Summary of Actions Raised in Logistics UK
Audit
Appendix 2 – HC Action Plan in Response to Audit
Appendix 3 – Action Plan Progress
Appendix 4 – OTC Response to HC Action Plan

Appendix 1 - Summary of Actions Raised in Logistics UK Audit

- Urgently review the management structure for the control and compliance of drivers
- Urgently review the process and controls for checking of driver licences
- Track tachograph calibrations, ensure all are recalibrated within the 2-year limit
- Ensure all vehicle tachographs are downloaded within the 90-day limit
- Ensure driver tachograph cards are downloaded within 28-days
- Add all maintenance providers onto the safety and compliance area of VOL (Vehicle Operating Licence Website)
- PMI (Periodic Maintenance Inspection) sheets should be reviewed for accuracy and completeness before being placed on file
- Ensure that PMI documents used by internal and external providers are bespoke to the equipment being inspected
- Brake test sheets should be reviewed for accuracy before being placed onto vehicle files
- Sufficient repair information should be annotated onto PMI sheets
- Tyre pressures to be measured, corrected where necessary, and recorded onto PMI documents
- Brake linings should be measured and recorded as part of the PMI process
- PMI events completed later than planned should have appropriate evidence placed onto the vehicle file
- Review the walk round check process, Transport Managers must have overall control of the process and compliance with the process
- Urgently review the defect reporting process
- Run 'Lead In' reports regularly, identify non-compliance and take appropriate action to prevent further issues
- Run regular overspeed reports, take appropriate corrective action where necessary
- Review the process for issuing pertinent information to driving staff, ensuring all toolbox talks include knowledge checks to ensure full candidate understanding
- Review driver recruitment process, Transport Managers must have sufficient influence within the process
- Review the controls and tracking of driver CPC training
- Review the process for monitoring weight on all vehicles, including refuse collection vehicles
- Ensure that comprehensive maintenance agreements (SLAs) are in place and valid
- Tyres mounted as a twinned fitment on a drive axle should not have more than 4mm in difference on treadwear
- Ensure that a formal process is in place to investigate reasons for MOT failures and work to prevent reoccurrence
- Review the process for ensuring that all key staff fully understand the policies and procedures for managing the Operator Licence
- Ensure that contracts of employment for vocational drivers includes information on the responsibilities of the role

- Ensure that all drivers are issued annual declarations of other work and health status
- Implement a formal drugs and alcohol policy that includes random testing
- Review the driver induction process
- Ensure that all drivers have formal familiarisation training on new or previously unused vehicle types
- The contract of employment for a Transport Manager should include specific information including the undertakings of a Transport Manager
- Improve control of data being managed by the Vision tachograph analysis system, the driver calendar should be fully populated with statutory absence
- Ensure that all occasional drivers record working time accurately, preferably by means of a manual entry
- Improve control of driver tachograph printouts, ensuring printouts are made where needed
- Improve control of infringements, drivers should be retrained where appropriate but formal action may be required if improvements are not seen
- Improve control of missing mileage, ensure that all instances are investigated and dealt with appropriately
- Review the roadwheel assessment and replacement policy
- Review the facilities at all sites
- Improve the level of training offered to technical staff to ensure that the correct skillset is available for effective diagnostics and repair

Response to Logistics UK fleet audit including action plan

Contents

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3. Supporting information and conclusions

Appendices

Appendix A	Letter from Office of Traffic Commissioner for Scotland regarding Preliminary Hearing 26 th June 2024
Appendix B	Decision letter from Office of Traffic Commissioner for Scotland following Preliminary Hearing 30 th October 2024
Appendix C	Annex to decision letter detailing requirements for Audit to be undertaken
Appendix D	"No defect, no repair" information emails to service managers
Appendix E	"No defect, no repair" email to Workshop management and supervisors

	Name	Signed	Date
Prepared by:	Andrew Hunter		17 th March 2025
Checked by:	Debbie Sutton		17 th March 2025
Approved by:	Malcolm MacLeod		17 March 2025



1. Background

On October 28th, 2024, following an investigation by the DVSA Highland Council attended a preliminary hearing held over Microsoft Teams with the Deputy Traffic Commissioner Mr Hugh Olson. The reasons (grounds) for the inquiry are detailed in the letter attached in Appendix A.

The hearing was attended by Andrew Hunter, Service Lead Transport & Logistics (HC), Malcolm Macleod, Assistant Chief Executive Place (HC), Mr Alistair Mackay, Compliance Officer (HC), Mr Richard Mackinnon, Compliance Officer (HC) and Mr Tom Docherty, Director – Anderson Strathern who represented the council.

Following the hearing a decision letter was issued to Highland Council on the 30th of October 2024, a copy of the decision letter is attached in Appendix B.

The decision reached by Mr Olsen is as follows:

The Deputy Traffic Commissioner issued a formal warning. The following undertaking was accepted and is now attached to the licence:

The operator will arrange an independent audit to be carried out by a DVSA- authorised audit provider, the RHA, Logistics UK or other equivalent independent body, by 28/02/2025. The audit will assess the systems for complying with maintenance and drivers' hours requirements, and the effectiveness with which those systems are implemented. The audit should cover at least the applicable elements in the attached annex. A copy of the audit report, together with the operator's detailed proposals for implementing the report's recommendations, must be sent to the Office of the Traffic Commissioner in Edinburgh within 14 days of the date the operator receives it from the auditor.

An annex detailing the scope of the audit were attached to decision letter and this included in Appendix C of the document.

Following receipt of the decision letter and the annex Highland Council engaged Logistics UK to undertake the audit to cover all elements presented in the annex to the decision letter.

The audit took place over the week commencing Monday 17th February 2025 and included all our 7 workshops and Headquarters.

The completed audit was received from Logistics UK on Tuesday 4th March 2025 by email and a copy of the audit is supplied alongside this document.



2. Response to Logistics UK audit

As per the requirements of the decision letter as issued by the OTC we are required to produce an action plan in response to the audit. The following is our response to the audit will include the actions required as part of our action plan.

Priority 1A and 2A items

Item 5.1.1

Priority Rating 1A

Action Point:

Urgently review the current management structure for control and compliance of drivers. Transport Managers must be able to demonstrate full, continuous and effective control over all aspects of the Operator Licence. If delegated authority is used, proof must be available to show that the directions of the Transport Managers are being effectively and accurately executed.

Highland Council Response:

A review of the Fleet management structure is currently being undertaken, proposing to allocate additional staff resources in the form of additional compliance monitoring staff for drivers, vehicles and the workshops operation to further enhance our full, continuous, and effective control of the Fleet. In addition to this review, it was recently agreed to create three additional mobile mechanics posts to serve the outlying areas in the Northwest of the Council area, this was approved at the Full Council meeting on March 6th, 2025, and these posts will be recruited to with a view to the operatives being in place by the 31st of May 2025. However, this timescale may be adjusted as we currently struggling to recruit suitably qualified and experienced mechanics. We are immediately adding a fourth Transport Manager to the Operating license to ensure further suitably qualified persons are responsible for the fleet, more than the minimum requirement. In addition to this extra Transport Manager, it is proposed we also add a fifth Transport Manager once they have received their certificates as they have only just passed the Transport Manager CPC qualification. As soon as they have received their certification etc., we will add them to the Operating License as a Transport Manager.

As a Council covering a large geographical area, we rely on Operational Managers across the Council areas to carry out tasks relating to the drivers on our behalf. Therefore, considering the audit findings we will also be engaging with Operational



Managers as soon as possible to discuss the findings of the audit and to reiterate the importance of adherence to the terms of the Councils Operating license in all aspects. This will be in addition to our regular fleet/service liaison meetings with the service managers. These take place monthly, and the actions points documented as a recurring note of the meeting.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.1.1-1	Review current fleet management structure	31-03-25
5.1.1-2	Implement outcomes from review of fleet management structure review	31-05-25
5.1.1-3	Arrange meeting with all fleet operational managers to communicate outcomes of audit, actions required and to reiterate Operational managers responsibilities in respect of the operating license.	15-04-25
5.1.1-4	Add 4 th and 5 th transport managers to the operating license. (Pending receipt of 5 th persons CPC certification etc.)	31-03-25

Item 5.1.10

Priority Rating 1A

Action Point:

Urgently review the process and controls for checking of driver licences. The transport team must have full oversight of status and endorsements for all drivers. Reduce the frequency of checks from 6-months to 3-months for low risk, and monthly for high-risk drivers. Drivers found not to have informed management about an endorsement will should be formally investigated and appropriate action taken. Ensure that all endorsements gained whilst using a Council vehicle are notified in line with the process, more serious endorsements gained whilst using a private vehicle should also be notified.

Highland Council Response:

As part of the Fleet management review (as per item 5.1.1) there will be an emphasis on having a dedicated Officer within the team whose sole responsibility will be the monitoring of all driver functions/activities. As part of enhancing our level of checks we are increasing the checks for endorsements or medical conditions on drivers' licenses



in line with the recommendations in the audit. Operational Managers will also be reminded of the driver's duty to inform them of any endorsements and the need for the Operational Manager to report this to the fleet service as part of the urgent meeting as detailed in item 5.1.1.

Work has also commenced on a revised Council disciplinary policy and procedure. As part of the revised policy there will be a section specifically related to all personnel who drive for the Council and the respective managers. The policy will incorporate a four-stage process relating to fleet infringements. Stage 1; an informal discussion, Stage 2; requires for formal education/training to be undertaken, Stage 3; an informal warning, and Stage 4; the invoking of a full disciplinary investigation. In the case of a driver not reporting an endorsement to their driving license or failing to report a medical condition that may impact on their driving, these will enter the disciplinary stages at an enhanced level.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.1.10-1	Change reporting regime to be in line with the audit recommendations 3 monthly for low-risk drivers and monthly for high-risk drivers	21-03-25
5.1.1-2	Add Fleet Compliance Officer specifically for driver monitoring to the team following the review of the service.	30-04-25
5.1.1-3	Include training on driver license endorsements/medical conditions for all fleet operational managers at urgent meeting as detailed in 5.1.1-3	15-04-25
5.1.1-4	Carry out revisions to Highland Councils Disciplinary policy to include specific section relating to fleet infringements etc. <i>Please note this date is provisional based on the need for such changes to be agreed with Trade Unions etc. before the revised policy can be submitted for Committee approval. Once approved the policy will be implemented.</i>	31-12-25



Item 5.3.3

Priority Rating 1A

Action Point:

Track tachograph calibrations, ensure that all are recalibrated within the 2-year limit. Ensure that valid tachograph calibration certificates are held on vehicle files.

Highland Council Response:

Workshop personnel are reminded that tachograph calibrations are required within the 2-year limit. Our workshops update our fleet management software with the due date, and this is highlighted on the schedule. The Vision software also includes the next tachograph calibration due date. To reiterate this, we will include this in our toolbox talk series for all workshop personnel. This will be monitored by internal audit and compliance Officer checks. Refresher training in the form of a toolbox talk and specific Vision software training will also be rolled out to workshop management personnel.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.3.3-1	Toolbox training talk issued to all workshop personnel regarding tachograph calibrations	31-03-25
5.3.3-2	Specific Vision software training to be undertaken for all workshop management personnel.	30-04-25
5.3.3-3	Internal audits to take place to ensure compliance. These to take place as soon as practicably possible with completion by mid-April. Internal audits then to take place on a quarterly basis.	15-04-25 then quarterly thereafter

Item 5.3.5

Priority Rating 1A

Action Point:

Ensure that all vehicle tachographs are downloaded within the 90-day limit, consider reducing the frequency to improve data flow and overall compliance. Consider automatic downloads for some vehicles.



Highland Council Response:

Workshop personnel are reminded that vehicle downloads are required within the 90-day limit. This will be monitored weekly and reminders sent out to the workshops to ensure downloads take place. Toolbox training will also take place to remind workshop personnel regarding the downloading of vehicles.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.3.5-1	Toolbox training talk issued to all workshop personnel regarding vehicle downloads	31-03-25
5.3.5-2	Specific Vision software training to be undertaken for all workshop management personnel regarding vehicle downloads	30-04-25
5.3.5-3	Vehicle downloads monitored weekly, and details sent onto workshops for action if required	Immediate then weekly

Item 5.3.6

Priority Rating 1A

Action Point:

Ensure that driver tachograph cards are downloaded within 28-days, consider reducing the frequency to ensure that compliance is maintained and improve data flow.

Highland Council Response:

This is responsibility of Transport Managers to ensure this is compliant although the function has been delegated to the service operational managers to ensure compliance. The compliance of driver card downloads is closely scrutinised weekly by the Fleet team. We will provide additional training to those who request it to ensure full compliance with our standard. Our reporting procedures will be updated to move from highlighting those at 28 days or above with now download to a 14-day report to enhance our compliance.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.3.6-1	Revise automated reporting period for non-	21-03-25



	downloaded cards to every 14 days instead of 28 days.	
5.3.6-2	Provide additional training to operational managers who require it. All training records to be held by the fleet team.	30-04-25

Item 5.4.2

Priority Rating 2A

Action Point:

Add all maintenance providers onto the safety and compliance area of VOL.

Highland Council Response:

This will be carried out immediately to add all maintenance providers to VOL.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.4.2-1	Maintenance providers details to uploaded to the safety and compliance area of VOL	28-03-25

Item 5.4.6

Priority Rating 1A

Action Point:

PMI sheets should be reviewed for accuracy and completeness before being placed on file, incidences of driver reportable defects should be investigated, and appropriate action taken. Issues in completion should be challenged to the relevant maintenance provider.

Highland Council Response:

Team leaders to ensure this is completed. The frequency of our own internal audits to be increased. Depot administration staff to carry out further checks during the filing process and refer to the Team Leaders if not completed. A refresher toolbox training package regarding the correct completion of PMI forms to be issued and completed.



Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.4.6-1	Issue refresher toolbox training talk to all workshop personnel regarding the correct completion of PMI sheets before filing.	31-03-25
5.4.6.2	Internal audits to take place to ensure compliance. These to take place as soon as practicably possible with completion by mid-April. Internal audits then to take place on a quarterly basis.	15-04-25 then quarterly thereafter

Item 5.4.7

Priority Rating 2A

Action Point:

Ensure that PMI documents used by internal and external providers are bespoke to the equipment being inspected, use supplementary sheets where needed.

Highland Council Response:

We currently use the standard paper Logistics UK form. However, the use of this form will be reviewed and if deemed necessary a batch of bespoke forms will be produced for the varying vehicle types and put into place. We will, however, be moving to a digital only solution once the tendering process for a replacement fleet management software is completed and this should allow for bespoke forms to be applied to the various vehicle types.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.4.7-1	Review use of current PMI form and its suitability.	31-03-25
5.4.7-2	Should review require use of new forms – prepare, procure and put into place new forms including training on use of new forms.	30-04-25
5.4.7-3	Move workshops to digital inspection sheet working alongside the new fleet management software. <i>Note – this timescale is provisionally based on the tender process being completed during the summer</i>	31-12-25



	<i>of 2025 and the software and associated hardware being implemented in Q3 and Q4 of 2025, assuming no substantial obstacles appear in integrating the software with existing Highland Council financial systems etc.</i>	
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Item 5.4.8

Priority Rating 1A

Action Point:

Brake test sheets should be reviewed for accuracy before being placed onto vehicle files for issues or errors, points noted should be reviewed with the relevant maintenance provider. All brake repairs should be supported by a validation roller brake test with report. All vehicles should complete a minimum of four roller brake tests per year (including MOT). Risk assessments should be completed for vehicles that are incapable of loading for a laden brake test, documents should be stored onto vehicle files.

Highland Council Response:

All our workshop personnel have received additional brake testing training as part of their IRTEC training. However, if further training needs are identified this will take place as a matter of urgency in the form of all toolbox talk or external training. Our policy is for a laden brake test (or unladen brake test if exempt or a risk assessment is in place) to be carried out at every PMI. All vehicle files to be checked and standard form to be added at front of file detailing the brake test requirements for that vehicle along with an individual brake test risk assessment for that vehicle where applicable.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.4.8-1	Review skills of current workforce in terms of brake testing (including risk assessments) to determine if additional training is required.	31-03-25
5.4.8-2	Should review require additional training is required this to completed as soon as possible thereafter.	31-05-25
5.4.8-3	Update all vehicle files to ensure the brake testing requirements are included at the front of the vehicle file.	31-03-25

Item 5.4.9

Priority Rating 2A

Action Point:

Sufficient repair information should be annotated onto PMI sheets to allow the scope of work to be understood under audit conditions.

Highland Council Response:

Team leaders to ensure this is completed. The frequency of our own internal audits to be increased. Depot administration staff to carry out further checks during the filing process and refer to the Team Leaders if not completed adequately. A refresher toolbox training package regarding the correct completion of PMI forms to be issued and completed.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.4.9-1	Issue refresher toolbox training talk to all workshop personnel regarding the correct completion of PMI sheets before filing.	31-03-25
5.4.9.2	Internal audits to take place to ensure compliance. These to take place as soon as practicably possible with completion by mid-April. Internal audits then to take place on a quarterly basis.	15-04-25 then quarterly thereafter

Item 5.4.10

Priority Rating 2A

Action Point:

Tyre pressures should be measured, corrected where necessary and recorded onto PMI documents.

Highland Council Response:

Team leaders to ensure this is completed. The frequency of our own internal audits to be increased. Depot administration staff to carry out further checks during the filing process and refer to the Team Leaders if not completed adequately. A refresher



toolbox training package regarding the correct completion of PMI forms to be issued and completed.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.4.10-1	Issue refresher toolbox training talk to all workshop personnel regarding the correct completion of PMI sheets before filing.	31-03-25
5.4.10.2	Internal audits to take place to ensure compliance. These to take place as soon as practicably possible with completion by mid-April. Internal audits then to take place on a quarterly basis.	15-04-25 then quarterly thereafter

Item 5.4.11

Priority Rating 2A

Action Point:

Brake linings should be measured and recorded as part of the PMI process to accurately track brake wear and assess the ability to complete a further cycle and highlight emerging issues with uneven brake wear.

Highland Council Response:

Team leaders to ensure this is completed where possible. Details to be recorded on PMI sheets and where measurement not readily possible then a visual assessment should be made and recorded on the PMI form.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.4.11-1	Issue refresher toolbox training talk to all workshop personnel regarding the recording of brake pad thickness where possible or details of visual assessment.	31-03-25



Item 5.4.13

Priority Rating 1A

Action Point:

PMI events completed later than planned should have appropriate evidence placed onto the vehicle file. Instances of vehicles not being released by operational teams must be escalated immediately for resolution.

Highland Council Response:

Toolbox talk to be prepared for workshop management to ensure there is documented evidence of the reasons why a PMI had taken place late and will include a process for escalation where Services withhold a vehicle causing the vehicle to have a late PMI. It should be noted that our current PMI schedule produced is based on a 7-week cycle to allow for slippage.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.4.13-1	Issue refresher toolbox training talk to all workshop management regarding the documenting of evidence to show why a vehicle has had a late PMI	31-03-25
5.4.13-2	Process to be developed for the escalation of cases where services wilfully withhold a vehicle from PMI	31-03-25

Item 5.4.14


Priority Rating 1A

Action Point:

Review the walk round check process, the Transport Managers must have overall control over the process and compliance to the process.

Highland Council Response:

We have identified that training is required to enhance the quality of the drivers walk round checks. In the interim we have issued guidance to Operational Managers regarding the quality and level of walk around check we require. Our workshop personnel have also been instructed as to what is expected to happen when a vehicle is presented with either no defect sheet filled out or an incomplete defect sheet is



presented. The details of these emails are attached in Appendix D. As part of the Fleet team structure review, we are looking to employ a dedicated Fleet Training Officer to develop a programme of training on this and various other needs for the Services. By keeping the training in house this will allow the Fleet service to dictate the training subjects being delivered and the content of the training. Our replacement Fleet Management Software will have the walk around check capability built and is viewed as a critical element of this software. This will allow seamless and real-time reporting of defects directly to the relevant workshop.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.4.14-1	Issue guidance to Service managers regarding the quality etc. of the walk around checks and defect reporting.	Completed 28 th Feb 2025
5.4.14-2	As part of Fleet Structure review create a Fleet Training Officer post to take control of all training related to the Fleet operation for drivers and Operational Managers	31-05-25
5.4.14-3	Implementation of a digital walkaround check process as part of the implementation of replacement Fleet management software.	31-03-26

Item 5.4.15

Priority Rating 1A

Action Point:

Urgently review the defect process. Ensure that all defect sheets are fully completed to show the details of the manager that received the defect, assessment and repair information and the name and signature of the Technician completing the repair. Planned repairs should be fully documented and shown to be appropriately assessed to either allow the vehicle to continue in service or placed VOR. Utilise a "No Defect, No repair" policy.

Highland Council Response:

We have identified that training is required to enhance the quality of the defect reporting. In the interim we have issued instructions to Operational Managers regarding the new no defect no repair policy in place. Our workshop personnel have



also been instructed as to what is expected to happen when a vehicle is presented with either no defect sheet filled out or an incomplete defect sheet is presented. The details of these emails are attached in appendix E. As part of the Fleet team structure review, we are looking to employ an additional new post of a Fleet Training Officer to develop a programme of training on this and various other needs for the services. Further compliance checking resource will also be sought as part of the Fleet Service structure review. Our replacement Fleet Management Software will have the defect reporting capability built and is viewed as a critical element of this software. This will allow seamless and real-time reporting of defects directly to the relevant workshop.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.4.14-1	Issue guidance to service managers regarding the quality etc. of the walk around checks and defect reporting.	Completed 28 th Feb 2025
5.4.14-2	As part of Fleet Structure review create and recruit a Fleet Training Officer post to take control of all training related to the Fleet operation for drivers and Operational Managers. A further fleet compliance resource will also be added to the service to monitor the compliance of drivers.	31-05-25
5.4.14-3	Implementation of a digital walkaround check process as part of the implementation of replacement Fleet management software.	31-03-26

Item 5.4.16

Priority Rating 1A

Action Point:

Run Lead In reports regularly, identify non- compliance and take appropriate action to prevent further issues.

Highland Council Response:

Reporting on this will be issued to all Operational Managers along with a toolbox training package to allow the managers to act if the Run Lead In times are showing as too low. Further compliance checking resource will also be sought as part of the Fleet Service structure review to monitor this and report back to the Service managers and



the Fleet management to act. It is anticipated that a digital solution for walk around checks will also assist in eliminating this issue.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.4.16-1	Issue reports to operational managers detail run lead in times not meeting the required standard as set out by Fleet.	Immediately
5.4.16-2	As part of Fleet Structure review create a further fleet compliance resource whose duties will include the monitoring and reporting of run lead in time issues	31-05-25
5.4.16-3	Implementation of a digital walkaround check process as part of the implementation of replacement Fleet management software to assist in the reduction of run lead in time infringements.	31-03-26

Item 5.4.18

Priority Rating 1A

Action Point:

Run regular overspeed reports, take appropriate corrective action where necessary.

Highland Council Response:

Reporting on this is carried out weekly and potential infringements raised with the relevant Service Manager. A documented procedure will be put in place as to how overspeed events should be dealt with and what action was taken. A further compliance resource will be created as part of the Fleet team restructure who will, as part of their role, monitor and report on compliance to the Fleet management and to Service Managers.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.4.18-1	Monitor overspeed events on a weekly basis and report any findings to Fleet management and the relevant service manager to investigate and potentially act.	Immediately



5.4.18-2	Develop a procedure to detail how overspeed events are dealt with and what action is taken.	31-03-25
5.4.16-3	As part of Fleet Structure review create a further Fleet Compliance Officer whose duties will include the monitoring and reporting of overspeed events	31-05-25

Priority 1B and 2B items

Item 5.1.3

Priority Rating 1B

Action Point:

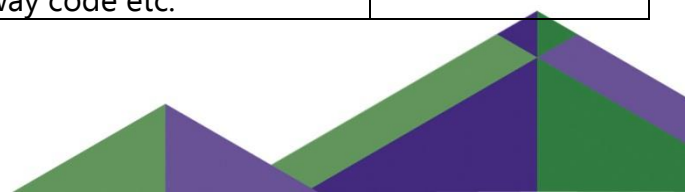
Review the process for issuing pertinent information to driving staff, ensure that all toolbox talks include knowledge checks to ensure full candidate understanding, local managers should assist in ensuring that training is effectively completed. Brief all driving staff on the changes to the Highway code, especially on pedestrian hierarchy. This can be achieved by means of a toolbox talk with knowledge check.

Highland Council Response:

As part of the Fleet team structure review, we are looking to employ a dedicated Fleet Training Officer to develop a programme of training on various fleet topics for the operational services. By keeping the training in house this will allow the Fleet Service to dictate the training subjects being delivered and the content of the training. In the interim a programme of toolbox talks with knowledge checks will be prepared and issued to all relevant services throughout the council. It is also our ambition to include a suite on mandatory management training relating to drivers and the management of drivers as part of the council's online learning and development system. Various other relevant fleet related training to be delivered by external parties and these will be deemed as mandatory for all Operational Managers and/or drivers i.e. bi-annual mandatory Operator License Awareness Training for all operational managers.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.1.3-1	Develop and issue to service managers with responsibility for driver's toolbox talks with knowledge check regarding any pertinent subject such as changes to the Highway code etc.	30-04-25



5.1.3-2	As part of Fleet Structure review create a Fleet Training Officer post to take control of all training related to the Fleet operation for drivers and Operational Managers.	31-05-25
5.1.3-3	Add fleet related training modules to the suite of mandatory e-training requirements for all managers of drivers throughout the council.	31-03-26

Item 5.1.7

Priority Rating 1B

Action Point:

Review the driver recruitment process, Transport Managers must have sufficient influence within the process.

Highland Council Response:

This will be raised as an urgent item at the next HR sub-group meeting on 19th March 2025. Ideally when recruiting vocational drivers', fleet or a sufficiently trained person should be involved in the recruitment process. The minimum desired outcome for the interim period would be for fleet to develop a set of mandatory questions and model answers to be prepared and included in recruitment processes to allow the recruiting Manager to test the applicants driving knowledge base before deciding on the successful applicant.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.1.7-1	Raise the need for Transport Managers to have sufficient influence in the recruitment of vocational drivers.	19-03-25
5.1.7-2	Develop a set of standard questions to be asked at the interview stage of recruiting vocational drivers. A set of model answers would accompany this to allow managers to determine the applicant's knowledge relating to the drivers' responsibilities as a vocational driver.	15-03-25



Item 5.1.9

Priority Rating 2B

Action Point:

Review the controls and tracking of driver CPC training. The transport team must have clear visibility of the status of training including modules delivered and modules required before expiry.

Highland Council Response:

Operational Managers are to be reminded of the need to log drivers CPC records on the Vision software. In the medium term this responsibility would fall under the remit of the proposed Fleet Training Officer who will undertake all CPC training in the Council.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.1.9-1	Issue instructions to operational managers regarding the absolute need to record all drivers CPC records on the Vision software system.	21-03-25
5.1.7-2	As part of Fleet Structure review create a Fleet Training Officer post to take control of all training related to the Fleet operation for drivers and Operational Managers.	31-05-25

Item 5.2.2

Priority Rating 1B

Action Point:

Review the resource allocated to the transport function, ensure that sufficient resource is available to allow full, continuous and effective responsibility for all aspects of compliance. This must also meet the requirements set in the Traffic Commissioners statutory documents (No3, Annex 1)



Highland Council Response:

Please refer to the response given for item 5.1.1.

Highland Council Action Plan:

Please refer to the response given for item 5.1.1.

Item 5.2.3**Priority Rating 1B****Action Point:**

Review the process for monitoring weight on all vehicles including refuse collection vehicles. Effective and robust monitoring requires the system to flag when the vehicle payload is exceeded. Incidences of overloading should be formally investigated and appropriate action taken to mitigate further occurrences. The transport team should monitor weight compliance.

Highland Council Response:

All new vehicles heavy goods vehicles to include axle weighing systems as a standard. We will investigate the potential for having a system to be retrofitted to current vehicles that do not have the functionality. We are about to go out to tender on a new telematics contract and we have included the need to be able to monitor axle weights remotely through the telematics system as part of the system requirements. The proposed additional Compliance Officer will also monitor vehicle weights as part of their ongoing duties. Should any doubts exist over a vehicle weight then managers and drivers are instructed to use a local weighbridge to carry out a check.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.2.3-1	All new HGVs to have axle weighing systems incorporated as a standard fit. New vehicle specifications to include this.	30-04-25
5.1.7-2	As part of Fleet Structure review create a further Fleet Compliance Officer whose duties will include the monitoring and reporting of overweight events.	31-05-25



Item 5.4.1

Priority Rating 2B

Action Point:

Ensure that comprehensive maintenance agreements (SLA) are in place and valid, these should include detail on fleet covered and maintenance requirements including brake testing. A schedule detailing equipment to be maintained should be agreed and attached.

Highland Council Response:

Where we have existing Repair and Maintenance contracts in place these will be reviewed to ensure compliance with the standard set out in the Guide for Vehicle Roadworthiness. All current arrangements with third party contractors will also be reviewed and agreements put in place to ensure adequate controls are in place to ensure compliance. We are also in the process of preparing a framework tender for vehicle maintenance and repair. This will include numerous key performance indicators, service level agreements etc to ensure all contractors used exceed the minimum standards set of the GVR.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.4.1-1	Review existing repair and maintenance contracts to ensure they comply with standards required.	30-04-25
5.4.1-2	Review all agreements with external 3 rd party contractors to ensure they comply with the standards required.	31-05-25
5.4.1-3	Complete tender process and implement framework arrangement for Vehicle maintenance and repairs	31-03-26

Item 5.4.12

Priority Rating 2B

Action Point:

Tyres mounted as a twinned fitment on a drive axle should not have more than 4mm in difference on treadwear. Poor twinning should be noted by technicians and appropriate action taken.



Highland Council Response:

We are using contractors to monitor and report on this in some of our locations. This will be rolled out to other depots where this can be provided. A toolbox talk will be prepared detailing the process to be followed and will be given to all workshop personnel to ensure they are aware of the procedures to be followed to ensure compliance. We are also preparing a new Tyre Supply and Maintenance Framework, and twinning inspections are included as an essential part of the framework.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.4.12-1	Roll out use of contractor to carry out twinning reports at other depots in council area.	31-03-25
5.4.12-2	Prepare and issue toolbox talk relating to the requirements for twinning of tyres and the process to be followed to ensure compliance.	31-03-25
5.4.1-3	Complete tender process and implement framework arrangement for Tyre supply and maintenance	31-10-25

Item 5.4.17**Priority Rating 2B****Action Point:**

Ensure that a formal process is in place to investigate reasons for MOT failures and work to prevent reoccurrence.

Highland Council Response:

There is currently an informal process in place where MOT failures are reported to the Compliance Officer (workshops) for investigation and action as appropriate. We have also implemented a final gate check on our vehicles being submitted for test by means of a Team Leader Gate check. This and the MOT fail review will be incorporated into a revised policy and procedure to formalise these processes to ensure that lessons are learned, to prevent future occurrences.



Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.4.17-1	Prepare policy and procedure relating to the pre-MOT gate checks and the investigation of reasons for MOT failures and the actions taken to prevent reoccurrence.	30-04-25

Priority 1C and 2C items

Item 5.1.2

Priority Rating 1C

Action Point:

Review the process for ensuring that all key staff fully understand the policies and procedures for managing the Operator Licence. Add documented knowledge checks on all policies and procedures delivered to staff, this includes toolbox talks. This helps to ensure full candidate understanding of the content.

Highland Council Response:

Response as per item 5.1.3

Highland Council Action Plan:

Action plan as per item 5.1.3

Item 5.1.4

Priority Rating 2C

Action Point:

Ensure that contracts of employment for vocational drivers includes information on the responsibilities of the role, this could be achieved by means of a reference within the contract to a comprehensive job role document.

Highland Council Response:

Standard clauses within the job and person specification (JPS) for all vocational drivers to be created and agreed with the councils HR team for inclusion. As Service Managers compile the JPS a briefing will be provided to the Managers regarding the standard clauses that must be included.



Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.1.4-1	Standard clauses for inclusion in Job and Person specification for vocational drivers to be prepared and agreed with the Councils HR team prior to issue to service operational managers	30-06-25
5.1.4-2	Briefing note to be prepared and issued to all operational managers regarding the inclusion of standard clauses to be included when recruiting vocational drivers	30-06-25

Item 5.1.5**Priority Rating 2C****Action Point:**

Ensure that all drivers are issued annual declarations of other work and health status. These should be reviewed by the transport team and held on file.

Highland Council Response:

This responsibility lies with the Service Managers. The policy regarding this will be reviewed to state that the Fleet team must receive copies of these declarations annually or if there is a work or health status change with the vocational driver. This will be monitored by the Fleet team using the proposed additional resource.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.1.5-1	Review policy regarding the annual supply of work and health status declarations for vocational drivers to ensure the Fleet team receive these.	30-04-25
5.1.5-2	As part of Fleet Structure review create a further Fleet Compliance Officer whose duties will include the monitoring and filing of work and health declarations for all vocational drivers.	31-05-25



Item 5.1.6

Priority Rating 2C

Action Point:

Implement a formal drugs and alcohol policy that includes random testing.

Highland Council Response:

This is ongoing and testing of with cause policy and procedures is to take place. Following this it will go to the relevant committee for approval thereafter. A policy that utilises random testing is not included in the proposed policy now. An amendment will be raised at HR sub-group with a view to implementing a random policy for vocational drivers and high-risk occupations only.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.1.6-1	Raise the inclusion of random testing with the HR sub-group as an annex in the policy and procedures specifically for vocational drivers and high-risk occupations.	31-03-25
5.1.6-2	As a Council implement policy and procedures relating to with cause drugs and alcohol testing.	30-09-25

Item 5.1.8

Priority Rating 2C

Action Point:

Review the driver induction process, Transport Managers must have sufficient input to deliver content specific to the transport function. An extensive knowledge test similar to a driving licence theory test should be delivered to ensure candidate knowledge.

Highland Council Response:

This will fall under the remit of a Fleet Training Officer. Driver induction package to be prepared and to be raised with HR for inclusion in the Council's employee induction policy. The 'test' would form part of the week one induction process and will be mandatory for all vocational drivers. Service Operational Managers will be briefed on this change once in place.



Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.1.8-1	Raise the inclusion of a specific vocational driver element into the Council's induction process.	31-03-25
5.1.8-2	As part of Fleet Structure review create a Fleet Training Officer post to take control of all vocational driver training to be included in the week 1 induction process.	31-05-25
5.1.8-3	Fleet Training Officer to develop knowledge test to be used in week 1 induction and to brief the relevant Operational Managers on its inclusion into the induction process.	30-06-25

Item 5.1.11**Priority Rating 2C****Action Point:**

Ensure that all drivers have formal familiarisation training on new or previously unused vehicle types. This should be delivered by a competent person and recorded onto training files.

Highland Council Response:

We currently undertake this with the manufacturers of any new vehicles that require this. Currently this is an informal process; however, a formal policy and procedure will be implemented to ensure a record of those undertaking familiarisation training is kept. The policy and procedure will also highlight the need for a new driver on an item of plant or vehicle to be adequately trained. This will fall under the remit of the proposed Fleet Training Officer.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.1.11-1	Develop a policy and procedure relating to familiarisation training on plant and vehicles.	30-04-25
5.1.11-2	As part of Fleet Structure review create a Fleet	31-05-25



	Training Officer post to take control of all vocational driver training to be included in the week 1 induction process.	
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Item 5.2.1

Priority Rating 2C

Action Point:

The contract of employment for a Transport Manager should include specific information including the undertakings of a Transport Manager. This could be included within the referenced job role document.

Highland Council Response:

This requirement will be raised at the Councils HR sub-group meeting on the 19th March 2025 with a view to contracts being amended to meet the requirement of Statutory Document 3: Transport Managers.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.2.1-1	Requirement for specific information to be provided in Transport Managers contracts to include the statutory requirements for a Transport Manager to be raised at the HR sub-group	19-03-25

Item 5.3.1

Priority Rating 1C

Action Point:

Improve control of data being managed by the Vision tachograph analysis system, the driver calendar should be fully populated with statutory absence.

Highland Council Response:

Training to be provided to Services as soon as possible in the form of an external training session. The proposed additional Fleet resource for compliance will continue to monitor and take action to keep up to date.



Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.3.1-1	Training to provided to services regarding the use of vision including completion of all required data in the software.	30-04-25
5.3.1-2	As part of Fleet Structure review create a further fleet compliance resource whose duties will include the monitoring and filing of work and health declarations for all vocational drivers.	31-05-25

Item 5.3.2

Priority Rating 1C

Action Point:

Ensure that all occasional drivers record working time accurately, preferably by means of a manual entry.

Highland Council Response:

As a matter of urgency toolbox training to be provided to services as soon as possible regarding the need to ensure that working time is recorded accurately. An audit programme will be drawn up to compare tachograph records and manual job cards to ensure all time is being recorded on the tachograph. The additional Fleet Compliance resource will undertake these audits.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.3.1-1	Training to be provided to services regarding the requirement that all working time is logged on the tachograph in the form of a toolbox talk.	31-03-25
5.3.1-2	As part of Fleet Structure review create a further fleet Compliance Officer whose duties will include the auditing of manual job cards and tachograph records to ensure they match.	31-05-25



Item 5.3.4

Priority Rating 1C

Action Point:

Improve control of driver tachograph printouts, ensure that printouts are made where needed. A copy should be retained by the driver for 28-days and returned to the transport team within 42-days.

Highland Council Response:

As a matter of urgency toolbox training to be provided to services as soon as possible regarding the need to ensure tachograph printouts are managed as per the standards required and sent on the Fleet team. The additional fleet compliance resource will undertake audits of this as part of their duties.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.3.1-1	Training to be provided to services regarding the requirement that all working time is logged on the tachograph in the form of a toolbox talk.	30-04-25
5.3.1-2	As part of Fleet Structure review create a further Fleet Compliance Officer whose duties will include the auditing driver tachograph printouts to ensure the standards are being met.	31-05-25

Item 5.3.7


Priority Rating 1C

Action Point:

Improve control of infringements, drivers should be retrained where appropriate but formal action may be required if improvements are not seen.

Highland Council Response:

We are currently reviewing the Councils' disciplinary procedures to include a specific section relating to matters associated with all aspects of driving. This addition will be as per the DVSA recommendations of a four-stage disciplinary process with certain infringements being initially dealt with at an appropriate stage in the process. We will



send out repeat infringement offenders reports to services monthly to allow them to act if required. Fleet compliance will continue to monitor and if required escalate issues to Service management.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.3.7-1	Revise Council disciplinary policy and procedures to include specific section relating to all driving related matters including a 4-stage process. <i>Please note this date is provisional based on the need for such changes to be agreed with Trade Unions etc. before the revised policy can be submitted for Committee approval. Once approved the policy will be implemented.</i>	31-12-25
5.3.7-2	Monthly reports on repeat infringement offenders to Service Managers to allow them to act if required.	31-03-25

Item 5.3.8

Priority Rating 1C

Action Point:

Improve control of missing mileage, ensure that all instances are investigated and dealt with appropriately.

Highland Council Response:

At present we monitor 2 to 3 times per week and then the missing mileage is dealt with corrected on the Vision system by collating the missing time against the driver records to correct the missing mileage. A formal policy and procedure will be developed as to how we deal with missing mileage reports. We will also develop a toolbox training talk for Operational Managers about the investigation of missing mile reporting.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.3.8-1	Develop and implement formal missing mileage policy and procedure for use by fleet and services	31-05-25
5.3.7-2	Fleet compliance to continue to monitor missing miles	Ongoing



	and refer to service managers where repeat offenders have been noted.	
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Item 5.4.3

Priority Rating 1C

Action Point:

Review the roadwheel assessment and replacement policy, provide clear guidance on when technicians should replace roadwheels due to excess corrosion and pitting. Consider a roadwheel replacement policy with an age-based protocol.

Highland Council Response:

We will review the roadwheel assessment and replacement policy with a view to providing clearer guidance on when roadwheels should be replaced. A toolbox training talk with a knowledge check will be developed on the back of the revised policy and issued to all workshop personnel.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.4.3-1	Review and implement a revised roadwheel assessment and replacement policy and procedure.	30-04-25
5.4.3-2	Toolbox training with knowledge check to be issued to all workshop personnel once policy and procedures in place.	31-05-25

Item 5.4.4

Priority Rating 2C

Action Point:

Review the facilities at all sites, consider key improvements where possible. Remove obsolete items from workshops to allow clear uncluttered working areas.

Highland Council Response:

In conjunction with our Logistics team, we are looking to remove all obsolete stock from all workshops and stores. Depot audits to take place ranging from Fire Safety



through to general housekeeping. We will engage with the Property team and Senior Management regarding the quality and potential replacement of buildings and facilities. Depot rationalisation and/or replacement forms a substantial part of the Councils Highland Investment Plan going forward.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.4.4-1	Alongside our Logistics team remove all obsolete stock from workshops and stores.	31-05-25
5.4.4-2	Have various depot audits carried out regarding facilities and equipment and implement any actions arising from those.	31-12-25
5.4.4-3	Continue to press senior Council leadership on the need for depot improvements/rationalisation.	Ongoing

Item 5.4.5

Priority Rating 2C

Action Point:

Improve the level of training offered to technical staff to ensure that the correct skillset is available for effective diagnostics and repair.

Highland Council Response:

The Council has an Employee Review and Development (ERD) policy and procedure in place, and this is applied to all personnel. Workshop staff will be reminded of the need for this to be adhered to. Training requirements are also discussed informally at our monthly meetings with the workshop team leaders. We will develop a workshop training plan to allow workshop personnel are adequately trained.

Highland Council Action Plan:

Action Ref.	Action proposed	Proposed completion date
5.4.4-1	Briefing note to workshop team leaders to be prepared and issued to remind them as to the ERD process	31-03-25
5.4.4-2	Management to ensure ERD's have been undertaken for all workshop personnel.	31-05-25



5.4.4-3	Develop workshop training plan based on outcomes of ERD's	31-08-25
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Supporting information

As can be seen from the action plan as detailed in section 2 of this document and from the audit report significant improvements are required across the whole of the Fleet operations. We recognise this and are determined to bring about effective change to resolve these issues quickly and effectively.

In general terms we do agree with the points raised in the audit but would like to raise our concerns that the auditor did not allow us to enter any records from other nearby offices, such as stores offices or operational offices to assist in the audit process. We believe this slightly tainted the outcome of the audit in some respects.

This audit will act as a base to allow us to further enhance the continuous and effective control we have on the fleet operation within Highland Council. We also believe that since the DVSA audit undertaken in 2023/24 that we have improved significantly and continue to do so. We now have all our mechanics and team leaders qualified to IRTEC standards and are continually looking to improve their knowledge and skillset. We continue to review the way we manage the fleet operations and are looking to continuously improve as we move into a completely digital operation.

Our plans are significant and show our ambition to be a leading fleet service in the Country. We aim to restructure the fleet service to enhance the resource across the whole operation, invest via the Highland Delivery Plan into new/upgraded depots and workshops, move to completely digital operation from drivers checks through to digital inspection forms etc., incorporating the workshop operations into the councils ISO9008 BSI accredited quality management scheme and continuing to move towards a fully decarbonised fleet.

We are very proactive in pushing for changes to existing HR policies and procedures, demonstrated by the upcoming Drugs and Alcohol Policy and procedures. We also communicate with operational Services regularly which we will enhance going forward to ensure pertinent information can be passed on quickly and effectively.

As part of the Fleet team restructure, we are going to bring all driver related training requirements inhouse to allow us as a team to more easily determine the direction of the training required. This will also allow us to also develop further training over and above that required as a minimum standard. The restructure will also allow us to deploy more resource to areas where we feel there could be an improvement on our current levels of continuous and effective control. As the Highland Council area is a substantial geographical area more resources on the ground can only enhance our control.



The Councils plan with regards to depots and workshops is an ambitious one and can only bring benefits to the fleet operation. Discussions have already taken place regarding the possibility of rationalising the depot/workshop network to create a more effective service. One option being explored is create a central super depot and a series of satellite depots in the more remote areas. These discussions are at a very early stage, but the Fleet team will ensure they continue, and progress is made with a clear route map being developed soon.

With all these points mentioned and the action plan we have in place we believe we can move forward as an organisation to enhance our effective and continuous of the fleet operations within Highland Council. To ensure our continued improvement we have committed to a follow up audit, to be provided by Logistics UK, to take place before the 31st of August 2025. In addition to this we will also undertake a full audit of our operations again to take place no later than the 31st of December 2025. Copies of these audits and the action plans arising from these audits will be submitted to the Office of the Traffic Commissioner to demonstrate our continued full, continuous, and effective control and our actions to improve on this.



Appendix 3 - Action Plan Progress

Item:	Action Proposed:	Priority Rating:	Proposed Completion Date	Update on Progress	RAG Status
5.1.1 and 5.2.2	Review current fleet management structure	1A / 1B	31-03-25	Draft restructure completed. Discussions ongoing.	Amber
	Implement outcomes from review of fleet management structure review		31-05-25	Restructure to be implemented once agreement reached	Green
	Arrange meeting with all fleet operational managers to communicate outcomes of audit, actions required and to reiterate Operational managers responsibilities in respect of the operating license.		15-04-25	Place cluster operational managers briefed at Place Cluster extended management team meeting on 3 rd April. Senior Management team briefed on 28 th April 2025. People and Corporate managers still to be briefed on relevant items relating to non-Operating License items.	Amber
	Add 4th and 5th transport managers to the operating license. (Pending receipt of 5th persons CPC certification etc.)		31-03-25	Persons to be added as soon as possible. Some slippages due to timescale in awaiting OTC response to action plan submission	Red
5.1.10	Change reporting regime to be in line with the audit recommendations 3 monthly for low-risk drivers and monthly for high-risk drivers	1A	21-03-25	Completed 17 th March 2025	Completed

	Add Fleet Compliance Officer specifically for driver monitoring to the team following the review of the service.		30-04-25	Restructure to be implemented once agreement reached on new structure.	Amber
	Include training on driver license endorsements/medical conditions for all fleet operational managers at urgent meeting as detailed in 5.1.1		15-04-25	Initial briefing completed. Training to be prepared and issued to all relevant managers.	Amber
	Carry out revisions to Highland Councils Disciplinary policy to include specific section relating to fleet infringements etc. <i>Please note this date is provisional based on the need for such changes to be agreed with Trade Unions etc. before the revised policy can be submitted for Committee approval. Once approved the policy will be implemented.</i>		31-12-25	Discussion with HR sub-group have taken place and work has started on this.	Green
5.3.3	Toolbox training talk issued to all workshop personnel regarding tachograph calibrations	1A	31-03-25	Toolbox talk added to schedule of training for workshop personnel.	Amber
	Specific Vision software training to be undertaken for all workshop management personnel.		30-04-25	Training being organised	Green

	Internal audits to take place to ensure compliance. These to take place as soon as practicably possible with completion by mid-April. Internal audits then to take place on a quarterly basis.		15-04-25 then quarterly thereafter	Due to illness no resource in place to carry out audits. Will be rescheduled as soon as possible.	Red
5.3.5	Toolbox training talk issued to all workshop personnel regarding vehicle downloads	1A	31-03-25	Toolbox talk added to schedule of training for workshop personnel.	Amber
	Specific Vision software training to be undertaken for all workshop management personnel regarding vehicle downloads		30-04-25	Training being organised	Green
	Vehicle downloads monitored weekly, and details sent onto workshops for action if required		Immediate then weekly	Completed.	Completed
5.3.6	Revise automated reporting period for non-downloaded cards to every 14 days instead of 28 days.	1A	21-03-25	Completed	Completed
	Provide additional training to operational managers who require it. All training records to be held by the fleet team.		30-04-25	Training needs to be identified, and training provided	Green
5.4.2	Maintenance providers details to uploaded to the safety and compliance area of VOL	2A	28-03-25	Completed	Completed

5.4.6	Issue refresher toolbox training talk to all workshop personnel regarding the correct completion of PMI sheets before filing.	1A	31-03-25	Completed	Completed
	Internal audits to take place to ensure compliance. These to take place as soon as practicably possible with completion by mid-April. Internal audits then to take place on a quarterly basis.		15-04-25 then quarterly thereafter	Due to illness no resource in place to carry out audits. Will be rescheduled as soon as possible.	Red
5.4.7	Review use of current PMI form and its suitability.	2A	31-03-25	Completed	Completed
	Should review require use of new forms – prepare, procure and put into place new forms including training on use of new forms.		30-04-25	Additional extra forms to be added for different vehicle types	Green
	Move workshops to digital inspection sheet working alongside the new fleet management software. <i>Note – this timescale is provisionally based on the tender process being completed during the summer of 2025 and the software and associated hardware being implemented in Q3 and Q4 of 2025, assuming no substantial obstacles appear in integrating the software with existing Highland Council financial systems etc.</i>		31-12-25	Ongoing – joint procurement exercise underway for the replacement fleet management software with Aberdeenshire Council via shared procurement service.	Green

5.4.8	Review skills of current workforce in terms of brake testing (including risk assessments) to determine if additional training is required.	1A	31-03-25	Completed	Completed
	Should review require additional training is required this to completed as soon as possible thereafter.		31-05-25	Ongoing – training added to training plan for 2025/26 for workshop personnel	Green
	Update all vehicle files to ensure the brake testing requirements are included at the front of the vehicle file.		31-03-25	Ongoing	Amber
5.4.9	Issue refresher toolbox training talk to all workshop personnel regarding the correct completion of PMI sheets before filing.	2A	31-03-25	Completed	Completed
	Internal audits to take place to ensure compliance. These to take place as soon as practicably possible with completion by mid-April. Internal audits then to take place on a quarterly basis.		15-04-25 then quarterly thereafter	Due to illness no resource in place to carry out audits. Will be rescheduled as soon as possible.	Red
5.4.10	Issue refresher toolbox training talk to all workshop personnel regarding the correct completion of PMI sheets before filing.	2A	31-03-25	Completed	Completed

	Internal audits to take place to ensure compliance. These to take place as soon as practicably possible with completion by mid-April. Internal audits then to take place on a quarterly basis.		15-04-25 then quarterly thereafter	Due to illness no resource in place to carry out audits. Will be rescheduled as soon as possible.	Red
5.4.11	Issue refresher toolbox training talk to all workshop personnel regarding the recording of brake pad thickness where possible or details of visual assessment.	2A	31-03-25	Toolbox talk added to schedule of training for workshop personnel.	Amber
5.4.13	Issue refresher toolbox training talk to all workshop management regarding the documenting of evidence to show why a vehicle has had a late PMI	1A	31-03-25	Toolbox talk added to schedule of training for workshop personnel.	Amber
	Process to be developed for the escalation of cases where services wilfully withhold a vehicle from PMI		31-03-25	Slippage due to lack of resources	Red
5.4.14	Issue guidance to Service managers regarding the quality etc. of the walk around checks and defect reporting.	1A	28-02-25	Completed	Completed
	As part of Fleet Structure review create a Fleet Training Officer post to take control of all training related to the Fleet operation for drivers and Operational Managers		31-05-25	Post is part of draft Restructure to be implemented once agreement reached	Green

	Implementation of a digital walkaround check process as part of the implementation of replacement Fleet management software.		31-03-26	Ongoing – joint procurement exercise underway for the replacement fleet management software with Aberdeenshire Council via shared procurement service.	Green
5.4.15	Issue guidance to service managers regarding the quality etc. of the walk around checks and defect reporting.	1A	28-02-25	Completed	Completed
	As part of Fleet Structure review create and recruit a Fleet Training Officer post to take control of all training related to the Fleet operation for drivers and Operational Managers. A further fleet compliance resource will also be added to the service to monitor the compliance of drivers.		31-05-25	Posts are part of draft Restructure to be implemented once agreement reached	Green
	Implementation of a digital walkaround check process as part of the implementation of replacement Fleet management software.		31-03-26	Ongoing – joint procurement exercise underway for the replacement fleet management software with Aberdeenshire Council via shared procurement service.	Green
5.4.16	Issue reports to operational managers detail run lead in times not meeting the required standard as set out by Fleet.	1A	Immediately	Completed	Completed

	As part of Fleet Structure review create a further fleet compliance resource whose duties will include the monitoring and reporting of run lead in time issues		31-05-25	Posts are part of draft Restructure to be implemented once agreement reached	Green
	Implementation of a digital walkaround check process as part of the implementation of replacement Fleet management software to assist in the reduction of run lead in time infringements.		31-03-26	Ongoing – joint procurement exercise underway for the replacement fleet management software with Aberdeenshire Council via shared procurement service.	Green
5.4.18	Monitor overspeed events on a weekly basis and report any findings to Fleet management and the relevant service manager to investigate and potentially act.	1A	Immediately	Completed	Completed
	Develop a procedure to detail how overspeed events are dealt with and what action is taken		31-03-25	In place. To tie in with Disciplinary process being developed.	Green
	As part of Fleet Structure review create a further Fleet Compliance Officer whose duties will include the monitoring and reporting of overspeed events		31-05-25	Post is part of draft Restructure to be implemented once agreement reached	Green

5.1.3 & 5.1.2	Develop and issue to service managers with responsibility for driver's toolbox talks with knowledge check regarding any pertinent subject such as changes to the Highway code etc.	1B / 1C	30-04-25	Training package being developed and will be issued to services once completed.	Green
	As part of Fleet Structure review create a Fleet Training Officer post to take control of all training related to the Fleet operation for drivers and Operational Managers.		31-05-25	Post is part of draft Restructure to be implemented once agreement reached	Green
	Add fleet related training modules to the suite of mandatory e-training requirements for all managers of drivers throughout the council.		31-03-26	Discussions to take place.	Green
5.1.7	Raise the need for Transport Managers to have sufficient influence in the recruitment of vocational drivers.	1B	19-03-25	Raised at HR sub-group – no problem with service specific interview questions etc.	Completed
	Develop a set of standard questions to be asked at the interview stage of recruiting vocational drivers. A set of model answers would accompany this to allow managers to determine the applicant's knowledge relating to the drivers' responsibilities as a vocational driver.		15-03-25	To be developed as soon as possible.	Red

5.1.9	Issue instructions to operational managers regarding the absolute need to record all drivers CPC records on the Vision software system.	2B	21-03-25	Completed	Completed
	As part of Fleet Structure review create a Fleet Training Officer post to take control of all training related to the Fleet operation for drivers and Operational Managers.		31-05-25	Post is part of draft Restructure to be implemented once agreement reached	Green
5.2.3	All new HGVs to have axle weighing systems incorporated as a standard fit. New vehicle specifications to include this.	1B	30-04-25	Completed	Completed
	As part of Fleet Structure review create a further Fleet Compliance Officer whose duties will include the monitoring and reporting of overweight events.		31-05-25	Post is part of draft Restructure to be implemented once agreement reached	Green
5.4.1	Review existing repair and maintenance contracts to ensure they comply with standards required.	2B	30-04-25	Ongoing	Green
	Review all agreements with external 3 rd party contractors to ensure they comply with the standards required.		31-05-25	Ongoing	Green

	Complete tender process and implement framework arrangement for Vehicle maintenance and repairs		31-03-26	Ongoing with shared procurement service to procure framework	Green
5.4.12	Roll out use of contractor to carry out twinning reports at other depots in council area.	2B	31-03-25	Completed	Completed
	Prepare and issue toolbox talk relating to the requirements for twinning of tyres and the process to be followed to ensure compliance.		31-03-25	Toolbox talk added to schedule of training for workshop personnel.	Amber
	Complete tender process and implement framework arrangement for Tyre supply and maintenance.		31-10-25	Ongoing with shared procurement service. Joint procurement exercise with Aberdeen City Council.	Green
5.4.17	Prepare policy and procedure relating to the pre-MOT gate checks and the investigation of reasons for MOT failures and the actions taken to prevent reoccurrence.	2B	30-04-25	Ongoing	Green
5.1.4	Standard clauses for inclusion in Job and Person specification for vocational drivers to be prepared and agreed with the Councils HR team prior to issue to service operational managers	2C	30-06-25	Ongoing	Green

	Briefing note to be prepared and issued to all operational managers regarding the inclusion of standard clauses to be included when recruiting vocational drivers		30-06-25	Ongoing	Green
5.1.5	Review policy regarding the annual supply of work and health status declarations for vocational drivers to ensure the Fleet team receive these.	2C	30-04-25	Policy creation ongoing	Green
	As part of Fleet Structure review create a further Fleet Compliance Officer whose duties will include the monitoring and filing of work and health declarations for all vocational drivers.		31-05-25	Post is part of draft Restructure to be implemented once agreement reached	Green
5.1.6	Raise the inclusion of random testing with the HR sub-group as an annex in the policy and procedures specifically for vocational drivers and high-risk occupations.	2C	31-03-25	Raised at HR sub-group – work to continue. Union opposition to random drug and alcohol testing.	Green
	As a Council implement policy and procedures relating to with cause drugs and alcohol testing.		30-09-25	Ongoing – committee approval will be sought before implementation.	Green
5.1.8	Raise the inclusion of a specific vocational driver element into the Council's induction process.	2C	31-03-25	Raised at HR Sub-group. No new policy change required.	Completed

	As part of Fleet Structure review create a Fleet Training Officer post to take control of all vocational driver training to be included in the week 1 induction process.		31-05-25	Post is part of draft Restructure to be implemented once agreement reached	Green
	Fleet Training Officer to develop knowledge test to be used in week 1 induction and to brief the relevant Operational Managers on its inclusion into the induction process.		30-06-25	Post is part of draft Restructure to be implemented once agreement reached. Officer to develop test.	Green
5.1.11	Develop a policy and procedure relating to familiarisation training on plant and vehicles.	2C	30-04-25	Ongoing	Green
	As part of Fleet Structure review create a Fleet Training Officer post to take control of all vocational driver training to be included in the week 1 induction process.		31-05-25	Post is part of draft Restructure to be implemented once agreement reached	Green
5.2.1	Requirement for specific information to be provided in Transport Managers contracts to include the statutory requirements for a Transport Manager to be raised at the HR sub-group	2C	19-03-25	Completed – Raised at HR Sub-group. Further discussions to take place.	Green
5.3.1	Training to provided to services regarding the use of vision including completion of all required data in the software.	1C	30-04-25	Training programme being developed.	Green

	As part of Fleet Structure review create a further fleet compliance resource whose duties will include the monitoring and filing of work and health declarations for all vocational drivers.		31-05-25	Post is part of draft Restructure to be implemented once agreement reached	Green
5.3.2	Training to be provided to services regarding the requirement that all working time is logged on the tachograph in the form of a toolbox talk.	1C	31-03-25	Some slippages due to lack of resource	Amber
	As part of Fleet Structure review create a further fleet Compliance Officer whose duties will include the auditing of manual job cards and tachograph records to ensure they match.		31-05-25	Post is part of draft Restructure to be implemented once agreement reached	Green
5.3.4	Training to be provided to services regarding the requirement that all working time is logged on the tachograph in the form of a toolbox talk.	1C	30-04-25	Toolbox talk to be developed and issued	Green
	As part of Fleet Structure review create a further Fleet Compliance Officer whose duties will include the auditing driver tachograph printouts to ensure the standards are being met.		31-05-25	Post is part of draft Restructure to be implemented once agreement reached	Green

5.3.7	Revise Council disciplinary policy and procedures to include specific section relating to all driving related matters including a 4-stage process. <i>Please note this date is provisional based on the need for such changes to be agreed with Trade Unions etc. before the revised policy can be submitted for Committee approval. Once approved the policy will be implemented.</i>	1C	31-12-25	Discussions ongoing with HR Sub-group and HR	Green
	Monthly reports on repeat infringement offenders to Service Managers to allow them to act if required.		31-03-25	Completed	Completed
5.3.8	Develop and implement formal missing mileage policy and procedure for use by fleet and services	1C	31-05-25	To be developed	Green
	Fleet compliance to continue to monitor missing miles and refer to service managers where repeat offenders have been noted.		Ongoing	Monitoring ongoing	Green
5.4.3	Review and implement a revised roadwheel assessment and replacement policy and procedure.	1C	30-04-25	Policy to be reviewed and developed	Green

	Toolbox training with knowledge check to be issued to all workshop personnel once policy and procedures in place.		31-05-25	Training has been organised for all workshop personnel – to take place in July and September 2025	Amber
5.4.4	Alongside our Logistics team remove all obsolete stock from workshops and stores.	2C	31-05-25	Route for disposal identified – resources to be allocated to carry out task.	Green
	Have various depot audits carried out regarding facilities and equipment and implement any actions arising from those.		31-12-25	Audits to be programmed in conjunction with specialists etc.	Green
	Continue to press senior Council leadership on the need for depot improvements/rationalisation.		Ongoing	Depots included in Highland Investment Plan. Service Lead: Transport and Logistics member of Strategic Asset Management Board.	Green
5.4.5	Briefing note to workshop team leaders to be prepared and issued to remind them as to the ERD process	2C	31-03-25	Some slippages due to lack of resources	Amber
	Management to ensure ERD's have been undertaken for all workshop personnel.		31-05-25	Ongoing	Green
	Develop workshop training plan based on outcomes of ERD's		31-08-25	Ongoing	Green

Appendix 4 - OTC Response to Highland Council Action Plan



Office of the Traffic Commissioner

Andrew Hunter
HIGHLAND COUNCIL
HIGHLAND COUNCIL
TRANSPORT AND LOGISTICS,
COMMUNITIES AND PLACE
HEADQUARTERS
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Sophie Johnson
Office of the Traffic Commissioner
Scotland
Direct Line:
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Our Ref: OM0021134

03/04/2025

Dear

GOODS VEHICLE OPERATOR LICENSING GOODS VEHICLES (LICENSING OF OPERATORS) ACT 1995

I refer to the audit carried out by Logistic UK on 17/02/2025 alongside some supporting evidence, an action plan and a cover letter.

In the audit there is a section regarding inspection records. Of the 29 vehicles across 7 Operating Centers over a 42-week period where records were checked 17 vehicles seem to have almost exclusively unladen brake tests. Can you please confirm what types of vehicles these are and if they are exempt from the requirement to have laden roller brake tests.

You have stated that Logistics UK will carry out a further audit before 31/08/2025 and an internal audit will be carried out before 31/12/2025 and that you will provide copies to us.

The Commissioner is therefore offering the 2 following undertakings to be added to your licence:

“The operator undertakes to identify an independent body to carry out an audit of transport safety and compliance systems. The audit will assess the operator against the standards published under the DVSA earned recognition scheme:

www.gov.uk/government/publications/dvsa-earned-recognition-vehicle-operator-standards.

A copy of the report together with the operator's detailed proposals for implementing the report's recommendations is to be emailed to the office of the Traffic Commissioner at sophie.johnson@otc.gov.uk by 5pm on 29/09/2025.

The audit will assess the systems for complying with maintenance and/or drivers hours requirements, and the effectiveness with which those systems are implemented. The audit should cover at least the applicable elements detailed in the guidance on Operator Compliance Audits available at:

www.gov.uk/government/publications/operator-compliance-audits“

Please reply within 14 days from the date of this letter.

Yours sincerely

Sophie Johnson | Hearing Centre Team Manager
Compliance Team