

Roadworthiness – flexible practices for Pre-Use Inspections

The Senior Traffic Commissioner recently issued interim guidance to assist the transport industry through the challenges presented by COVID-19, through flexible working practices and a balanced approach.

Pre-Use Inspections

The over-riding principle is that you must never operate a vehicle in an unsafe condition.

WHERE ANY CONCESSION IS USED, ROBUST DAILY CHECKS AND EFFECTIVE USE OF VEHICLE MONITORING SYSTEMS ARE EVEN MORE IMPORTANT THAN USUAL.

You know your business and where the greatest risks are. Based on this knowledge you should adopt a risk-based approach.

During the period of Covid-19, some vehicles may not be used, and consideration has been given to the timing, quality and need for pre-use inspections.

Normal practice is that, prior to putting vehicles that have been stood idle (VOR) back into service they should be subject to a pre-use inspection.

Traffic commissioners recognise that when vehicles have not been used during this Covid-19 period, operators are likely to want to start using the vehicles as soon as possible, or at short notice, and when there may not be enough inspection slots available at maintenance and inspection facilities causing delays to businesses wanting to start again.

For fleets that are not used during the Covid-19 period:

THE PRINCIPLES TO BE APPLIED ARE:

- The PMI schedule is frozen or paused during the period that the vehicle is not used
- The time to the next inspection can include any relaxation in PMI inspection intervals (as detailed in our guide **FTTC Guidance Roadworthiness – No. 3**)
- If the regular PMI inspection period has been exceeded or, if qualified for relaxation as detailed in the **FTTC guide** above), its extended PMI interval, the first walk-round check prior to use is to be carried out by a **technician** and shall be an enhanced check, including:
 - a) Check of tyre pressures and
 - b) Brake performance test - this test, if not undertaken on a roller brake tester, will include a measured temperature check after a road test. The temperatures are to be recorded and retained.
- Vehicles over 12 years old and more than 50% or 4 weeks, whichever is greater, over their PMI scheduled inspection will receive a full PMI inspection before use.
- Regardless of the combinations of relaxations applied, no vehicle will be put into service if more than 17 weeks has elapsed since the last full PMI.

FTTC Guidance – application of any of these principles should be recorded by the technician and Operator and the record retained on the Vehicle File with the technician's first walk-round check.

Traffic commissioners will monitor the period of inactivity and, should it be longer than anticipated, may amend this advice. The guidance from the Senior Traffic Commissioner has given a series of Q&As of examples relating to the procedures above and we have appended these below:

FTTC GUIDANCE

Additionally, we would suggest:

- It may be best to select appropriate vehicles such as those that are newer and lower mileage, and more recently serviced, and to carry out and record parts of the inspections if possible, such as rolling road brake tests and other items which are crucial to the vehicle safety.
- A detailed record should be kept recording and demonstrating the steps taken in advance to try to prevent the transgression.
- Try to anticipate the return or increase of work, giving more opportunity to try to secure the workshop space and time.
- If earlier slots are offered take them, it may be better to maintain the planned PMI inspection schedule so that your vehicles are ready to use at short notice without having to take advantage of the principles above; but make sure you adjust your maintenance planner and adjust the timing of the following inspections.

It must be borne in mind at all times that vehicles and trailers being used operationally must be kept safe and roadworthy, and any records that will substantiate this at a later date, will be useful.

It is also imperative, that if PMIs are 'out of schedule' that Daily Walkaround checks are undertaken by drivers and that these are rigidly monitored to ensure that process is functioning effectively

FTTC – GUIDANCE – Road safety cannot be jeopardised and therefore it is important that walk around checks are audited – if you require a copy of a suitable auditing form to show that this is being done – please contact us on the details below.

ALTHOUGH THERE MAY APPEAR TO BE A GREATER DEGREE OF FLEXIBILITY FOR SOME GROUPS – OPERATORS, DIRECTORS, TRANSPORT MANAGERS AND DRIVERS STILL HAVE A DUTY OF CARE TO OTHER ROAD USERS FOR THEIR SAFETY – WE ARE CONFIDENT THAT ANY OPERATOR OR DRIVER DELIBERATLY FLOUTING THESE RELAXATIONS WILL FACE THE FULL FORCE OF THE LAW AND THE TRAFFIC COMMISSIONER'S POWERS

IF FURTHER GROUPS OF OPERATIONS ARE ADDED TO THE LIST THEN WE WILL NOTIFY YOU ACCORDINGLY

IF YOU HAVE ANY QUERIES PLEASE CALL FOSTER TACHOGRAPHS & TRANSPORT COMPLIANCE ON 01772-655155 OR EMAIL tom@fostertachographs.co.uk

SOME EXAMPLES TO CONSIDER FROM THE SENIOR TRAFFIC COMMISSIONER

- Q1. A 3-year-old vehicle is planned with a 10-week PMI schedule, it is taken out of service at week 4 of the schedule and is off the road for 8 weeks, what inspection is required to bring the vehicle back into service?**
- A. A technically competent person, (technician if possible) is to carry out an enhanced walkaround check, which includes tyre pressure measurement and brake performance test. The brake performance test, which if not undertaken on a roller brake tester, with a measured temperature check of the brakes after a road test. The vehicle then has a further 5 weeks to schedule the next PMI, not 6 as that would take it in excess of the 17-week backstop
- Q2. A 3-year-old vehicle is planned with a 10-week PMI schedule, it is taken out of service during week 10 of the schedule and is off the road for 4 weeks, what inspection is required to bring the vehicle back into service? A**
- A. A full PMI is required as the vehicle was in the last week of the 10-week schedule.
- Q3. A 14-year old vehicle is planned with a 4-week PMI schedule, it is taken out of service at week 1 of the schedule and is off the road for 2 weeks, what inspection is required to bring the vehicle back into service?**
- A. Schedule remains the same, enhanced driver walkaround check, PMI required in 1 week.
- Q4. A 5-year old vehicle is planned with a 12-week PMI schedule, it is taken out of service at week 1 of the schedule and is off the road for 20 weeks, what inspection is required to bring the vehicle back into service?**
- A. A full PMI is required as the vehicle would go beyond the 17-week maximum PMI interval
- Q5. A 5-year old vehicle is planned with a 12-week PMI schedule, it is taken out of service at week 1 of the schedule and is off the road for 8 weeks, what inspection is required to bring the vehicle back into service?**
- A. Schedule remains the same, enhanced driver walkaround check needs to be carried out, PMI required in 8 weeks, (which inc para 6 concession maximum of 17 weeks between inspections).
- Q6. A 6-year old vehicle is planned with a 6-week PMI schedule, but it is now on week 8 and running under para 6 concession. it is taken out of service and is off the road for 4 weeks, what inspection is required to bring the vehicle back into service?**
- A. A full PMI is required as the vehicle was operating overdue under para 6 concession.