motor fleet
Risk Management Manual
Australian Government Fleet
TARGET ZERO

As Australia and New Zealand’s leading provider of motor fleet insurance and risk management services, Lumley Insurance has first hand knowledge of the costs associated with motor vehicle collisions and related incidents. These costs can be reduced through the application of sensible, principles-based risk management, driver education and with the right attitude. Therefore we encourage all motor fleet clients to strive for a goal of zero motor vehicle collisions.

We call this Target Zero.

Apart from the cost saving, a collision free fleet means happier, healthier and more productive staff because the stress and injury resulting from collisions is reduced.

By law, employers also have a responsibility to address employee safety in relation to vehicles and driving.

While risk management principles remain constant, each fleet has its own characteristics. This Manual is designed to provide Australian Government agencies with the framework to develop their own motor fleet risk management program. In doing so they can seek to achieve Target Zero, lower operating expenses and create a safer work place for employees.

Vivek Bhatia
CEO
Lumley Insurance

The Lumley Insurance Motor Fleet Risk Management Manual is based on the basic principles of risk management. It encompasses a four-step plan consisting of:

1. Formalising a plan
2. Reporting, data and claims administration
3. Employment & education of drivers

The four steps are explained in this Manual together with suggestions and examples of how to reduce motor vehicle collisions. The key elements of a successful program are also summarised in Appendix 1.

You will notice we use the words “collision” or “incident”, rather than “accident” when describing how a vehicle was damaged. This is deliberate: In nearly every circumstance when a vehicle is damaged, human error is to blame. Collisions and incidents are not events that “happen by chance” Therefore, we do not consider the word “accident” to be an accurate description.

The information contained in this Manual has been used successfully by many clients to control costs. However it is not exhaustive and as research and technology continue to advance, new methods will become available. Lumley Insurance will keep you informed of new developments by way of this Manual or by our motor fleet risk management initiatives.

Raj Singh
National Motor Manager
Lumley Insurance

MANUAL OVERVIEW

The information contained in this Manual has been used successfully by many clients to control costs. However it is not exhaustive and as research and technology continue to advance, new methods will become available. Lumley Insurance will keep you informed of new developments by way of this Manual or by our motor fleet risk management initiatives.

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STEP 1 - FORMALISE A PLAN

1.1 Senior Management

To ensure its success, a motor fleet risk management program must be formalised and documented then approved, supported and driven by senior management. Management support and involvement in a motor fleet risk management program is vital because:

- under the Commonwealth’s Occupational Health & Safety Act 1991 it is management’s responsibility to provide a safe working environment for all employees
- a reduction in fleet collision costs = reduced/minimised risk management program is vital because:

Management support and involvement in a motor fleet risk management program must be formalised and documented then approved, supported and driven by senior management.

Below is an example of how management’s attitude to motor fleet risk management can affect fleet safety performance and operating costs.

Case Study

The losses on a fleet of 50 sedans, primarily used by sales people, meant an organisation was almost uninsured. Senior management, using the reasoning - whilst we are making increased sales, increased insurance premiums do not matter – had accepted the high cost of insurance.

Offers of risk management assistance were declined. The arrival of a new chief executive heralded a different approach. The cost of insurance was regarded exorbitant and unacceptable. The relevant data was sought and the results were discussed with senior managers.

As part of an overall program, an excess-sharing concept for ‘at-fault’ drivers was introduced along with an incentive scheme for drivers who were collision-free.

Within 12 months there was a dramatic turnaround – only four collisions (three not at-fault) plus five windscreen claims. A total cost of $6,000 compared to $127,000 for the previous year.

Senior management now take a keen interest in what has previously been considered an unimportant matter.

1.2 Policy Statement

Senior management must define and communicate their organisation’s fleet safety objectives by promoting both their Motor Fleet Risk Management Policy and their Fleet Safety Policy Statement. The fleet safety policy statement should be accessible to all staff. The statement should be displayed throughout all departments and given to drivers. It should become the focal point for the new and ongoing approach to lower the motor vehicle collision rate.

It is essential that senior management maintains a high level of first hand interest in fleet safety and supports its application. Failure to support the policy will discourage drivers from supporting it themselves.

The following example is the Lumley Insurance Fleet Safety Policy Statement.

1.3 Responsibility

Allocate responsibility for fleet collision costs, prevention techniques and driver education.

Those responsible for vehicles (and drivers) should be fully informed of management’s goals, objectives and expected benefits. It is important that management have the information, time and resources necessary to effectively manage the policy.

Management can demonstrate their commitment to motor fleet risk management and improve awareness of it by:

- placing fleet safety on the agenda of management meetings
- budgeting sufficient funds to provide training and resources
- becoming personally involved in fleet safety by attending safety meetings and participating in driver training courses
- understanding the causes of motor fleet collisions and how to prevent them
- recognising and acknowledging good driver and cost centre performance.

1.4 Awareness

In addition to the above, information on motor fleet collisions should be provided on a monthly basis to all levels of management.

This information should include:
- the number and cost of collisions
- collision causes (if known)
- trends
- the names of drivers involved in repeat collisions.

Drivers and their managers should be made aware of this information.

The emphasis on safety should be displayed to drivers in every way possible, enforcing the message that collisions are preventable. Ways of enforcing the message include:

- displaying the company’s policy statement in foyers and meeting rooms
- peer group discussions
- regularly updating articles or posters in employee meeting areas and parking areas
- safety stickers on or inside vehicles
- information via the e-mail or internet.

A motor fleet risk management programme will only be successful when a safety attitude is encouraged and enforced by management and there is an awareness of the required safety standards within every level of the organisation.

It is vital to report and record data relating to ALL motor vehicle collisions, regardless of the repair costs or excess level.

Drivers should be required to provide accurate information after every collision. This information should be recorded on a claim form (or similar) and then recorded onto a central database.

Lumley Insurance
Motor Vehicle Fleet Safety Policy Statement

Lumley Insurance requires that motor vehicles be operated in a manner that minimises the risks they pose to:

1. the public and their property
2. the employees who drive them, both in the capacity of their occupation and as a driver entrusted with the organisation’s vehicle
3. assets of which each vehicle is a significant component.

This will be achieved by:

EACH DRIVER being held responsible for the proper operation, care and maintenance of the vehicle entrusted to their care. Avoidable losses and costs will be a component in assessing the performance of the allocated driver or custodian.

EACH MANAGER ensuring that all drivers under their control receive appropriate instruction and training to permit them to perform their function to a satisfactory standard. Managers are expected to exercise control over vehicle operations by ensuring that drivers under their management fulfill their responsibilities.

THE PROPER OPERATION, CARE, AND MAINTENANCE OF EACH VEHICLE IS CONSIDERED TO BE AN INTEGRAL PART OF THE PERFORMANCE OF THE JOB TO WHICH IT IS ASSIGNED.

Vivek Bhatia
CEO

The CEO of Lumley Insurance has signed this statement. This demonstrates that the senior management team is an integral part of the programme by signalling their interest in the safety performance of the fleet.

[919x284]CEO
Vivek Bhatia

TO WHICH IT IS ASSIGNED.

THE PROPER OPERATION, CARE AND MAINTENANCE
OF EACH VEHICLE IS CONSIDERED TO BE AN
INTEGRAL PART OF THE PERFORMANCE OF THE JOB
TO WHICH IT IS ASSIGNED.

Vivek Bhatia
CEO

[934x562]component.

EACH DRIVER being held responsible for the proper operation, care and maintenance of the vehicle entrusted to their care. Avoidable losses and costs will be a component in assessing the performance of the allocated driver or custodian.

EACH MANAGER ensuring that all drivers under their control receive appropriate instruction and training to permit them to perform their function to a satisfactory standard. Managers are expected to exercise control over vehicle operations by ensuring that drivers under their management fulfill their responsibilities.

THE PROPER OPERATI...
It is important that agencies record data relating to ALL motor vehicle collisions and incidents, regardless of the repair costs or excess level.

Drivers should be required to provide accurate information after every collision or incident involving damage to a vehicle. This information should be recorded on a claim form (or similar) and then recorded in a central database.

### 2.1 Why Collect Data?

Having specific information on collisions will enable an agency to:

- identify collision trends and causes
- implement prevention measures
- monitor performance
- control costs.

The collection of data is essential if the number of collisions/incidents, vehicle damage and subsequent costs are to be reduced.

### 2.2 Claim Forms

Lumley Insurance has found the less complicated the claim form the more accurate claims data will be. Most information needed for analysis will be collected from the claim form.

Ensure every vehicle has a claim form in its glove box. This way, information can be recorded immediately after a collision/incident while it is still clear in the driver’s mind.

This will assist in obtaining accurate information. Drivers should be advised of the procedures to be observed following an incident periodically.

All damage, whether below or above insurance policy excess, should be recorded. Doing this will enable each agency to establish the total cost of vehicle collisions.

The following table outlines requests for information that can be included in claim forms.

<table>
<thead>
<tr>
<th>Request for information</th>
<th>What can be analysed from this information?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Driver's name</td>
<td>Who is having collisions?</td>
</tr>
<tr>
<td>Driver's agency</td>
<td>Compare agency performance and allocate costs to agency</td>
</tr>
<tr>
<td>Description of collision/incident</td>
<td>How &amp; why the collision/incident occurred</td>
</tr>
<tr>
<td>Location/Time/Day of collision/incident</td>
<td>When &amp; where the collision occurred</td>
</tr>
<tr>
<td>Liability</td>
<td>Establish who is at fault</td>
</tr>
</tbody>
</table>

Other data that can be analysed from a claim form includes:
- vehicle use (business or private)
- vehicle type
- vehicle driver (custodian, family or other).

### 3.1 Driver Selection

The driver selection process is vital to a fleet's performance. Agencies should have an induction program for those who will be driving agency vehicles.

- **Licence details**
  - Potential employers have the right to request a copy of a driver’s licence or confirm a licence status with the Roads and Traffic Authority.
  - This is also the time to check a driver’s eligibility to drive specific vehicles by way Licence Endorsement etc.

### 3.2 Driver Induction

When a driver begins employment, outline the agency’s values and standards as they relate to feet safety and risk management. Make clear what is expected for vehicle care and driver safety.

An agency’s requirements for safe driving should be clearly stated in all selection documentation relating to positions involving mandatory driving.

In addition to the selection process, an agency should include a driving segment in the employee’s induction program that includes:
- a copy of the agency’s fleet safety policy
- provision of a driver handbook outlining the agency’s procedures along with some tips on how to prevent collisions

During the induction program, drivers must also be made aware of the agency’s policy on alcohol/drugs and driving. Drivers should also be advised it is their responsibility to immediately notify management if their licence is suspended for any reason.

### 3.3 Driver Education

Agencies should consider driver training as a strategy for improving driving performance.

A comprehensive driver education program should include:
- Driver assessments: Here an assessor monitors and measures each driver in their vehicle
- Driver training: Completed in a controlled environment, this will improve skill and understanding of the vehicle
- In-house training programs: This will reinforce the safety message and techniques learned in driver training
- Incident investigation: A thorough investigation of each collision must be made to determine the circumstances surrounding it
- Campaigns: Wherever possible, highlight the causes of collisions using all forms of media
- Driver interviews: Interview drivers to review the causes of collisions and agree on prevention methods.

### 3.4 Driver Training

Those who should attend driver training will vary from agency to agency.

It can include:
- all drivers
- all drivers likely to exceed 25,000km per annum
- all drivers under 25 years of age or all drivers with less than seven years driving experience
- all drivers involved in motor vehicle collisions regardless of fault
- drivers identified as “at risk” through assessment.

Provided other elements of the driver education program are in place, the ideal situation would be to have all drivers attend a course within their first year of service followed by a refresher course every three to four years.
OTHER USEFUL TIPS

1. The Vehicle

Where vehicles do not have a specific work application (e.g. Executive Vehicle Scheme vehicles), vehicles should be chosen that suit the particular driver. It is very important that drivers are suited to the vehicle they are driving.

For example, some drivers feel uncomfortable driving large sedans or Sports Utility Vehicles (SUVs). Similarly, work (or home) car parks are sometimes not well suited to large vehicles.

1.1 Maintenance

Regular maintenance provides drivers with safer vehicles. It also demonstrates the agency’s attitude to safety, thus encouraging drivers to adopt the same attitude.

Drivers should be aware of procedures for vehicle maintenance. Management should have a system in place to ensure vehicles are properly maintained. This has particular relevance under the OH&G Act.

1.2 Inspections

Random inspections of vehicles demonstrate that the vehicle’s condition is important to the agency.

Inspections should monitor:

- vehicle cleanliness (exterior, interior and boot)
- tyre condition
- panel damage
- unsecured objects in vehicles.

A more comprehensive inspection of vehicles, particularly those assigned to more than one driver, should be conducted quarterly or when the vehicle is serviced.

1.3 Security

The National Motor Vehicle Theft Reduction Council (NMTRC) has a goal to reduce the theft rate to one of the lowest in the industrial world over the next decade. To help achieve this, laws have been toughened to place more responsibility on drivers to secure their vehicles.

For example, the law requires that, if a driver leaves their vehicle for any amount of time, they must take their keys from the ignition, close all windows and lock all doors.

This must be done if the driver is moving more than three metres from the vehicle and nobody 16 years of age or older is staying with or inside the vehicle.

(Never leave children or animals unattended in a vehicle.)

There are numerous security devices available to protect vehicles. Some are simple and inexpensive. The devices chosen should depend on the vehicle’s appeal to thieves, the value and the cargo carried.

Some security options include:

- immobilisers
- alarms
- window and panel etching
- tracking devices.

It only takes seconds for a thief to steal a vehicle. Do not give thieves a chance and do not attract their attention by leaving valuable items on display inside the vehicle.

2. Benchmarks

Lumley Insurance has conducted an analysis of their clients’ fleet collision results, and involved clients with Lumley Insurance Best Practice Benchmarks. The benchmarks can be used to compare an agency’s fleet performance.

Lumley Insurance Best Practice Benchmarks for sedans, light commercials and large single rear axle rigid vehicles include:

- no more than 20 collisions per 100 vehicles per annum
- no more than six at-fault collisions per 100 vehicles per annum
- the percentage of at-fault collisions involving two or more vehicles should be 15 per cent or lower
- the percentage of at-fault collisions involving a single vehicle only should be 15 per cent or lower
- the percentage of unknown third party at-fault collisions should be 10 per cent or lower
- no more than one at-fault collision per four years per driver for the agency’s most exposed drivers.

Kilometre Based Best Practice

- no more than 10 collisions per million kilometres travelled (based on an average 20,000 kms per vehicle).

3. Self Audit

The Lumley Insurance Motor Fleet Risk Management Self-Audit (Appendix 2) was developed to enable an agency to compare and evaluate specific elements of their risk management program to what Lumley Insurance regards as best practice.

Eight specific elements are examined and results are analysed. While there are numerous elements to a comprehensive risk management program, Lumley Insurance considers the eight selected elements as vital to building a cost-effective and successful program. The result for each element will identify where improvement is required to reach best practice.

From the analysis we can determine if an agency’s standards:

- are achieved and maintained for best practice
- are above average
- are achieving the minimum requirements and need improvement
- are not achieving their standards and require greater attention.

4. Superior Driving Techniques

To assist agencies with driver education and vehicle safety awareness, Lumley Insurance has produced a series of risk management brochures and a Safe Driving DVD. There are 17 brochures in the series. They can be ordered from any Lumley Insurance office and would be a useful addition to an agencies website or intranet.

Brochures include:

1. Avoiding a rear end collision
2. Theft prevention
3. Sharing the road with heavy vehicles
4. Dangerous road conditions
5. Safe loading suggestions
6. Using roundabouts
7. Driving on country roads
8. Operating forklifts
9. Tipping
10. Towing caravans and trailers
11. Adverse weather conditions
12. Avoiding reversing collisions
13. Going four wheel driving
14. Right of way/give way
15. Driving with mobile phones
16. Using ABS brakes
17. Safety hints that will improve your driving

5. Conclusion

The material contained in this Manual will enable agencies to develop effective motor fleet risk management programs.

While the principles of risk management remain the same, every fleet is unique - what works for one fleet may not necessarily work for another.

Therefore, it is suggested that you use this Manual as a guide only and keep abreast of new developments.
If an agency wants to reduce costs resulting from motor vehicle collisions, they must actively implement a structured plan.

By following The Lumley Insurance Four Steps to Success, an agency is guaranteed a structured and effective program.

The Four Steps to Success are:
1. Formalise a Plan
2. Reporting and Data
3. Employment and Training
4. Accountability.

It is critical to the success of the program that each step is implemented in the correct order, with careful research and strong management support. For example, driver training is a good initiative but when it is provided as a reaction, without detailed claims data and management involvement, it is not as efficient.

Lumley Insurance recommends that an agency:
• reviews each of the Four Steps to Success
• establishes and publishes a formal plan
• implements the plan
• reviews the plan regularly.

The Lumley Insurance risk management team will assist an agency to reduce costs but encourage the agency to first implement a formal plan.

Step 1 – Formalise a Plan
A. Involve everyone who is responsible for vehicles and/or safety (e.g. management, staff, fleet managers, OH&S officers, staff consultative committee etc).
B. Review the Four Steps to Success and develop a strategy.
C. Present the strategy to management to gain support and (if necessary) funding.
D. Advise management of the strategy.
E. Advise staff of the strategy.
(If Step 1 is not achieved in total, the program’s effectiveness will decrease)

Step 2 – Reporting and Data
A. For reporting purposes ensure vehicles are clearly allocated within your agency (e.g. to a Cost Centre, Division, Branch etc).
B. Obtain claims data (above and below excess) and allocate to Cost Centre, Division, Branch etc.
C. Ensure Cost Centre, Division, Branch etc managers receive claims data quarterly.
D. Advise drivers of their Cost Centre, Division, Branch etc performance quarterly and reinforce safe driving techniques.

Step 3 – Employment and Training
A. Check licence and (where appropriate) driving history as part of the recruitment process.
B. Where appropriate, establish an induction program for drivers.
C. Where appropriate, establish an in-vehicle and in-house driver training program.
D. Provide drivers with written instructions via a driver handbook. Ensure that these instructions are reasonably accessible to drivers.

Step 4 – Accountability
A. Establish what is an unacceptable performance.
B. Interview drivers following collisions to investigate the circumstances.

The Motor Fleet Risk Management Self-Audit was developed to enable agencies to compare and evaluate specific elements of their risk management program to what Lumley Insurance regards as best practice.

Whilst there are numerous elements to a risk management program, Lumley Insurance considers the selected elements to be the most vital for a cost effective and successful program.

The selections made for each element will highlight where improvement is required to reach best practice. The audit is designed to assist the Australian Government Agencies to comply with various legislative requirements imposed on them in respect of workplace safety in regard to motor vehicles.

The completion of the audit will assist agencies with identifying opportunities to reduce the risk associated with operating a motor vehicle.
Please provide a brief description of the operating environment(s) of your Agency’s vehicles (e.g. Urban, Remote area, off road, modified, 4x4):

---

Vehicle Category Schedule
(Provide numbers of vehicles)

<table>
<thead>
<tr>
<th>State/Territory</th>
<th>Pool Vehicles</th>
<th>Executive Vehicles</th>
<th>4 x 4 4WD</th>
<th>Trucks Rigid (over 5 tonne)</th>
<th>Trailers</th>
<th>Small Buses</th>
<th>Total Vehicles</th>
</tr>
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</tbody>
</table>

Grand Totals

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(Tick all boxes that describe your organisation’s practice in relation to this element. Provide comments if you need to.)

**Element 1. Motor Risk Management Plan**

**My Agency**

- [ ] OH&S Policy or similar includes driver safety and fatigue management strategies.
- [ ] Policy agreed and endorsed by senior management.
- [ ] OH&S Policy and driver safety strategies communicated to employees.
- [ ] Driving is recognised as OH&S risk.
- [ ] Written Fleet Policy with limited strategies to control collision/incident costs.
- [ ] Management and drivers actively involved in managing driver risk.
- [ ] Policies regarding vehicle use and responsibility.
- [ ] Some emphasis on controlling collision/incident costs.
- [ ] No specific Fleet Policy or procedures.

**Comments**

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### Element 2. Agency Management

**My Agency**

- Management performance and agency profitability affected by fleet collision/incident costs.
- Management required to monitor and control collision/incident costs.
- Management develop and direct cost reduction strategies.
- Management and selected staff actively involved in fleet risk management.
- Management support driver education initiatives.
- Management and selected staff responsible for fleet risk management but minimal guidelines in place.
- Management responsibility for fleet risk management not defined.

**Comments**

### Element 3. Performance Monitoring / Awareness

**My Agency**

- All collisions/incidents above and below excess reported.
- Management receives quarterly claims analysis by group, cost centre and driver.
- Management responds to analysis.
- Performance Benchmarks established.
- Claims results/analysis regularly provided to drivers.
- Management provides results to drivers / staff.
- Management monitor traffic violations.
- Irregular reports on claims.
- Some emphasis on management and driver awareness of fleet claims results.
- Minimal management/driver awareness of claims.
- Only collisions/incidents above excess reported.

**Comments**
### Element 4. Driver Education

**My Agency**

- [ ] Formal programme in place.
- [ ] In-house training and in-vehicle courses compulsory for all drivers on a regular basis.
- [ ] Remedial program for repeat offenders.
- [ ] Formal program in place for repeat offenders and new employees.
- [ ] Program includes in-house training and in-vehicle courses.
- [ ] In-house education programs only.
- [ ] No driver education programme in place.

**Comments**

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### Element 5. Employment and Induction

**My Agency**

- [ ] Driving history required and verified for employment.
- [ ] Drivers provided with copies of policies relating to vehicle use and responsibility.
- [ ] Drivers attend formal induction course on driving agency vehicles.
- [ ] In-house and in-vehicle driver training for new employees.
- [ ] Attitude assessment conducted.
- [ ] Road test conducted if warranted.
- [ ] All licences viewed and verified.
- [ ] Physical examination if required.
- [ ] Drivers provided with written instructions on vehicle use and responsibility.
- [ ] Licence check conducted.
- [ ] Licence verified for employment.
- [ ] Written instructions provided on the use of agency vehicle.
- [ ] Informal induction program.
- [ ] No driving record or proof of licence required for employment.
- [ ] No induction programme in place.
- [ ] Limited guidelines on vehicle use.

**Comments**

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### Element 6. Collision Investigation

<table>
<thead>
<tr>
<th>My Agency</th>
</tr>
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<tbody>
<tr>
<td>☐ Management / peer group review every collision/incident and counsel drivers if required.</td>
</tr>
<tr>
<td>☐ Meetings documented and prevention techniques actioned.</td>
</tr>
<tr>
<td>☐ Disciplinary measures applied if warranted.</td>
</tr>
<tr>
<td>☐ Management review all at fault collisions/incidents and counsel drivers if warranted.</td>
</tr>
<tr>
<td>☐ Meetings documented and prevention techniques actioned.</td>
</tr>
<tr>
<td>☐ Formal review of collisions/incidents conducted by management where there is blatant negligence or high claims cost.</td>
</tr>
<tr>
<td>☐ No collision/incident investigation or review.</td>
</tr>
</tbody>
</table>

**Comments**

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### Element 7. Claims Procedures

<table>
<thead>
<tr>
<th>My Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Claim forms to be completed for all collisions/incidents above and below excess.</td>
</tr>
<tr>
<td>☐ Regular audit of repairs.</td>
</tr>
<tr>
<td>☐ Repair Network in place.</td>
</tr>
<tr>
<td>☐ Claims procedures established and easily accessed.</td>
</tr>
<tr>
<td>☐ Management countersign claim forms.</td>
</tr>
<tr>
<td>☐ Claim forms to be completed for all collisions/incidents.</td>
</tr>
<tr>
<td>☐ Claim forms provided to management for review.</td>
</tr>
<tr>
<td>☐ Claim form completed for all collisions/incidents above the excess.</td>
</tr>
<tr>
<td>☐ Claims procedures in place.</td>
</tr>
<tr>
<td>☐ No formal procedures.</td>
</tr>
</tbody>
</table>

**Comments**

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________
(Tick all boxes that describe your organisation’s practice in relation to this element. Provide comments if you need to.)

**Element 8. Vehicle Maintenance / Security**

**My Agency**

- Vehicle maintenance procedure in place.
- Feedback provided on vehicles in poor condition.
- On site inspection of vehicles conducted randomly.
- Extra security devices fitted to high cost vehicles.
- Vehicles purchased with consideration to security, safety and suitability for tasks.
- Vehicle defect reporting system in place.
- Maintenance issues detailed in driver handbook.
- Management provided with maintenance reports.
- Pool vehicle usage monitored.
- Maintenance policy in place.
- Guidelines issued.
- No policy or guidelines in place.

**Comments**

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