

## Road compliance

Chain of Responsibility: Leading the way







## Leading the conversation about safety and compliance

At Linfox and BevChain, the conversation about safety and compliance is one we have with team members across our operations every day.

While we have built a reputation on safety and compliance over many years in the transport and logistics industry, we know that even the most efficient supply chain can quickly come undone without a firm commitment to compliance at every link in the chain.

This means that every team member at Linfox and BevChain, whether they are based in the yard, in the office, in the workshop, in the warehouse or on the road, must understand the role they play in the Chain of Responsibility.

Driven by an industry-leading safety culture, Linfox and BevChain's robust approach to risk management and road compliance is finely tuned across our operations to address our obligations under Heavy Vehicle National Law.

This is supported by an ongoing investment in a modern fleet with state-of-the-art safety features and the latest vehicle technology to detect and deter fatigue on long-haul routes.

Our focus on health and wellbeing through our Healthy Fox program and research partnerships helps our drivers make healthy work and lifestyle choices.

Importantly, Linfox and BevChain's best drivers train new drivers in our leading operational training program to maintain the highest standards of safety and performance.

And finally, our award-winning subcontractor data management system ensures all parties who influence our freight tasks are compliant with our uncompromising safety standards and CoR obligations.

Through our commitment to Vision Zero, at Linfox and BevChain we seek to be safer in everything we do, leading the way in road safety and compliance across the transport and logistics industry.

Mark Whitworth General Counsel, Corporate Legal and Compliance Linfox Logistics







## Managing road compliance risk at Linfox

Managing safety and compliance requires the right work practices, attitudes and culture at all levels of an organisation. At Linfox and BevChain, we work hard to maintain a strong network of systems, policies and practises to meet our Chain of Responsibility (CoR) obligations and keep our drivers and community safe.

#### 1. Managing risk from the top down

Linfox executive officers and senior managers oversee our road compliance framework and receive regular reporting information from the road compliance team. Managers and supervisors report directly to the CEO on incidents and emerging risks.

#### 2. Conducting regular audits

Assessments and audits of CoR, subcontractors, fatigue management, maintenance management and mass management are completed annually to review the effectiveness of our road compliance management system.

### 3. Aspiring to the highest industry standards

Managed nationally by the National Heavy Vehicle Regulator (NHVR), the National Heavy Vehicle Accreditation Scheme (NHVAS) recognises operators with robust safety and road compliance management systems in place. Linfox and BevChain are accredited for:

- Mass Management
- Maintenance Management
- Basic Fatigue Management (BFM)

## 4. Delivering regular risk-reduction training

Linfox Operational Training (LOT) is a registered training enterprise (RTO) that delivers intensive induction and risk reduction training to Linfox and BevChain management, operational staff and subcontractor drivers. All team members and subcontractors are required to undergo refresher training to maintain currency.

## 5. Monitoring driver behaviour with leading safety technology

Our in-cab camera technology helps our drivers stay alert to their environment by assisting in the measurement and monitoring of driver behaviour. The in-cab technology records an event that entails risky behaviour which may lead to an incident. Alerts are triggered by braking, cornering and rough or uneven surfaces, or the driver can manually trigger the event. When alerts are triggered, we can intervene with improvement measures to mitigate the risk of an incident. We can also be alerted of positive events, which are used to acknowledge and reward good driver behaviour.



## 6. Encouraging our people to stay healthy

A healthy workforce is an engaged workforce. Linfox and BevChain's Healthy Fox program provides education, tools and opportunities to promote and support health and wellbeing, and fuel positive choices at work and at home.

### 7. Leading a culture of zero tolerance for drugs and alcohol

Our zero drug and alcohol policy extends to all Linfox and BevChain employees and subcontractors. We conduct extensive pre-employment, random and incident-based testing. Any traces of drugs or alcohol leads to immediate termination of employment.

### 8. Driving a modern, well-maintained fleet

Our trucks are no longer just trucks. Our ongoing investment in new fleet and technology enables greater levels of regulatory compliance and improved safety. Our fleet benefits from a dedicated approach to vehicle maintenance, including frequent turnover of heavy vehicles, regular tyre replacement, electronic pretrip inspection on every truck and scheduled maintenance.



## 9. Engaging with government and industry regulators

Partnership and collaboration with leading industry bodies allows us to maintain best practice by keeping abreast of emerging risks. Linfox and BevChain engage regularly with the National Transport Commission (NTC), National Heavy Vehicle Regulator (NHVR), state and territory road and policing agencies and other industry associations.

## 10. Maintaining the highest levels of subcontractor compliance

In 2016, Linfox launched FOXLink to ensure Linfox's safety standards and CoR compliance are front of mind for everyone involved in freight tasks for Linfox and BevChain. FOXLink is an online subcontractor management system that enables us to ensure driver compliance, with mandatory and customer-specific safety accreditation and training requirements. FOXLink gives us instant access to subcontractor information, including the driver's company, other drivers and vehicles. We also store and access driver induction and training records. FOXLink provides a direct channel of communication to ensure Linfox and BevChain subcontractor drivers meet our high standards of driver training and performance. FOXLink was awarded the 2017 SMART Supply Chain and Logistics Award.

# Managing key risks and hazards

The Heavy Vehicle National Law is designed to improve safety through a proactive approach to managing the risks associated with the transport task. The key hazards and risk types under the HVNL relate to the four core obligations of CoR and include:

- 1. Speed compliance
- 2. Fatigue management
- 3. Mass, dimension, and loading
- 4. Vehicle standards

Linfox and BevChain have systems and processes in place to identify and address the risks associated with each CoR obligation.



#### **Speed compliance**

Breaches of speed compliance obligations and incidents caused by speeding heavy vehicles

Managing the risk:

- We have completed a risk assessment of speed compliance obligations under the Heavy Vehicle National Law.
- We plan driver schedules with appropriate timeframes, so drivers are not directly or indirectly pressured to exceed the speed limit.
- We adjust and manage changes to schedules, including delays, so drivers are not directly or indirectly pressured to exceed the speed limit.
- We monitor driver speed via our FoxTrax fleet management system, with automatic notifications of breaches using GPS-based telematics systems.
- We monitor at-risk behaviours such as harsh braking and cornering, reckless driving and distractions using

- in-cab telematics and facial technology that detects risk and alerts drivers with real-time notifications.
- We report on vehicles exceeding the speed limit and take action to address speeding breaches (NCR).
- We ensure all heavy vehicles, including subcontractor vehicles, are fitted with fit-for purpose, maintained, calibrated, speed-limiting devices and that these have not been adjusted or tampered with.
- We confirm drivers are licenced for the heavy vehicle or combination they are operating and expect them to adhere to Australian road rules in the state/s and or territory of operation.
- We prepare executive board reporting of breaches, incidents and emerging risks from speeding heavy vehicles to identify if any further actions or reasonable steps are needed.



#### **Fatigue management**

Breaches of fatigue management obligations and incidents caused by drivers being impaired by fatigue

- We have completed a risk assessment of fatigue management obligations under the Heavy Vehicle National Law.
- We are accredited in NHVAS Basic Fatigue Management (BFM).
- We have documented fatigue management and BFM procedures.
- We conduct internal and external audits on Linfox and BevChain's fatigue management system.
- We empower drivers to act if impaired by fatigue by self-declaration and selfreporting if feeling sleepy, physically or mentally tired, weary or drowsy, exhausted and/or lacking in energy.
- We take positive action if a driver declares, or is deemed, unfit to drive.
   For example, taking care of the

- driver's welfare by making alternative arrangements including provisions for the driver to have additional rest.
- We consult with drivers and other parties as relevant in the scheduling of journeys and rostering of drivers.
- We provide training to help drivers to self-manage fatigue, and other persons to aid the welfare of drivers with awareness of the signs of fatigue, and education of the importance of quality rest and lifestyle factors.
- We plan driver's rosters with appropriate timeframes for work and rest, so drivers are not directly or indirectly pressure, to drive whilst fatigued or breach their work and rest hours.
- We regularly check and verify drivers are fit to drive, both physically and mentally, and not affected by drugs and alcohol.



- Our supervisors facilitate a check-in process that includes a thorough visual observation of the driver to confirm they are fit to drive to the best of the supervisors' knowledge and training.
- We monitor driver fatigue with incab telematics, EWD's and facial technology that detects risk and alerts drivers with real-time notifications.
- We prepare executive board reporting of breaches and incidents and emerging risks from fatigue to identify if any further actions or reasonable steps are required to be taken.



#### Mass, dimension and loading

Breaches of mass, dimension and loading obligations and incidents caused by incorrectly positioned or restrained loads and overloaded heavy vehicles

- We have completed a risk assessment of mass, dimension and loading obligations under the Heavy Vehicle National Law.
- We are accredited in NHVAS Mass Management and WAHVA.
- We have documented mass, dimension, loading management and assurance procedures that outline the control measures implemented.
- We undertake internal and external audits of mass, dimension and loading management systems.
- We identify and report (NCR) when consignment arrangements are identified as having the potential to cause a driver to breach mass, dimension and loading requirements.
- We schedule fit-for-purpose vehicles and combinations that have the capability, capacity and equipment to match the mass, dimension and loading requirements, including mass management accreditation schemes,

- mass and dimension permits, access permits or dangerous goods requirements of the freight task.
- We verify accuracy of positioning and distribution of the load, including its stability, in accordance with loading instructions, and adjust as required

   e.g. documented load distribution plans, load planning tools.
- We make sure route (safe driving plans) take into consideration mass and dimension requirements to ensure the route/infrastructure is suitable for the load and complies with any route permits or conditions as applicable.
- We verify loads are placed, secured and restrained to withstand the forces specified in the performance standards in the National Transport Commission Load Restraint Guide.
- We check equipment used in the loading process, including mass management (e.g. scales) and load restraint (e.g. lashings), is fit-for-



purpose, regularly inspected and maintained, and calibrated as required.

- We make sure loads are suitably prepared to prevent breaches of the HVNL, manage risk and maintain a safe road environment.
- We prepare executive board reporting of breaches and incidents and emerging risks from mass, dimension and loading to identify if further actions or reasonable steps are needed.
- We identify the gross and axle weights, dimension and loading requirements applicable to each vehicle and combination i.e. onboard mass management, load plans, container weight declarations and accurate transport documentation.



#### Vehicle standards

Breaches of vehicle standards obligations and incidents caused by unsafe or defective heavy vehicles

To ensure each heavy vehicle used on the road complies with heavy vehicle standards under the HVNL, we have the following policies, procedures and actions in place:

- We have completed a risk assessment of vehicle standards obligations under the HVNL.
- We are accredited in NHVAS Maintenance Management.
- We have a documented WAHVA & NHVAS Maintenance Management Procedure.
- We conduct internal and external audits of our maintenance management system.

- We ensure all vehicles are safe, roadworthy and maintained correctly.
- We ensure a vehicle that is unsafe is not used on a road and drivers are not asked to operate an unsafe vehicle.
- We confirm the vehicle is fit for use and identify a vehicle that is unsafe before operation (Pre-departure Inspection) to detect problems with critical safety components.
- We record and report any unsafe vehicles, faults or defects before, during or after operation (as soon as possible) utilising EDRR.
- We identify a vehicle that does not comply with heavy vehicle standards and prevent any noncompliant or faulty vehicle from being used by a driver (tag out) and remove from service.



- We assess faults for severity, track their correction or monitor until rectified.
- We have an extensive repair and maintenance program, and proactive preventative maintenance schedules.
- We prepare executive board reporting of breaches and incidents and emerging risks from vehicle standards to identify if any further actions or reasonable steps are required to be taken.



## Partnering with you

Over 65 years in the logistics industry, we have built an unrivalled reputation based on safety, compliance and a firm commitment to our obligations in the Chain of Responsibility.

At Linfox and BevChain we work hard to maintain our leadership in a competitive industry by delivering safe and efficient supply chain solutions for our customers.

We have the systems and support in place to ensure the safety of our people, our customers and the communities in which we operate.

If you would like more information about your role in the Chain of Responsibility and Linfox and BevChain's approach to risk management and compliance, please get in touch.

Together, we can ensure solid road compliance with heavy vehicle laws at every link in the chain.

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