

What steps should you take to ensure your OCRS (Operator Compliance Risk Score) stays firmly in the green? Brian Weatherley talks to the enforcers

f you don't know what the Operator Compliance Risk Score (OCRS) is, where have you been this past eight years? Introduced in 2006 by VOSA (since merged with the DSA to become the Driver and Vehicle Standards Agency, or DVSA), OCRS is the keystone for spotting and targeting noncompliant operators, together with their drivers and vehicles, wherever they are.

As all operator licence holders in England, Scotland and Wales should know, a company's OCRS is derived from two fundamental compliance criteria: roadworthiness, based on first and subsequent annual tests and what DVSA calls vehicle encounters (such as inspections at an operator's premises and roadside checks); and traffic, based on roadside inspections and prosecutions for drivers' hours and tachograph offences, overloading, etc. Since 2012, the OCRS system has been based on data collected over a rolling three-year period (it was two), with scores updated on a weekly basis.

When an annual test, fleet or roadside inspection uncovers defects or infringements, points are awarded against the operator's OCRS. The more serious the defect or infringement, and the more infringements recorded, the more OCRS points accumulate. Based on the tally, DVSA then allocates an OCRS traffic light status of green (low risk), amber (medium) or red (high risk). There is also a grey category for what DVSA terms an unknown operator

- one for which no enforcement data is yet available.

Unsurprisingly, any operator with a red OCRS rating can expect the full attention of DVSA's enforcement officers, particularly out on the road. As the agency confirms, when it comes to roadside checks: "We'll always look to stop red-rated operators' vehicles first."

Do you know your OCRS score? O licence holders can access their OCRS report online via www.gov.uk/dvsa-online-report-services. You'll need your O licence number to complete the form. DVSA will then send a confirmation letter with instructions on how to access your OCRS. The process takes five working days, but you can then get OCRS reports for as far back as 28 September 2012, when the current scoring system was introduced.

Getting greener

It goes without saying that the best way to stay in the green is to be compliant with all your O licence undertakings. But what do traffic commissioners and the DVSA look for when it comes to proving you're one of the OCRS good guys? And what self-help steps can you take to protect a good OCRS score?

"Operators are advised to visit the gov.uk website in the first instance regarding their OCRS," suggests a DVSA spokesperson. "They'll be able to access clear advice on how to remain compliant via our new OCRS page, which has just been launched at www.gov.uk/use-the-operator-compliance-risk-score-ocrs-system. While no dedicated phone number for OCRS exists, operators can also call our contact centre on 0300 123 9000, where our staff will be able to assist with their enquiry."

DVSA strongly recommends operators to regularly check their OCRS. "Track progress of your OCRS



and, if it changes, get your OCRS report so you can understand why it has changed," says the spokesperson. And he adds: "Set performance targets to improve the score in the future."

The abovementioned website provides a comprehensive guide to OCRS, including how scores are calculated, the points weighting system applied across the rolling three-year period, traffic light bands and trigger events that can earn a 'straight to red' classification. There's also a table listing the number of points incurred for each offence and defect.

Note: an OCRS score can change positively following a 'clear encounter' – where a vehicle passes an inspection without any problems. Meanwhile, historic encounters that previously counted towards an OCRS score are discounted when they pass out of the calculation period.

If you think your OCRS is incorrect, the starting point for queries is your local DVSA office, making sure you lodge any appeal as soon as possible after any enforcement event. However, DVSA cautions: "The appeal is only likely to succeed if you've got a good case for the decision to be reversed."

Kevin Rooney is not only traffic commissioner for the North East of England, but is also joint lead on enforcement matters for liaising with DVSA (along with West of England traffic commissioner Sarah Bell). On the subject of maintaining a good OCRS score, he advises: "As a starter, traffic commissioners expect operators and transport managers to be receiving their OCRS and other reports from DVSA and reviewing them regularly – probably monthly for an operator of any size. If done properly and meaningfully, compliance with the O licence undertakings should mean that issues don't arise."

However, where they do, Rooney adds: "TCs

expect the transport manager to undertake a thorough investigation. Was the prohibition due to wear and tear, an in-service defect, or a driver issue? If so, what can be done to prevent it?"

He continues: "Maintenance systems benefit from regular reviews. For example, if PMIs [preventative maintenance inspections] identify safety-critical defects, are the vehicles being inspected frequently enough? Is the vehicle correctly specified for the job? Does the maintenance provider know what sort of work the vehicle is on? Are drivers doing their checks properly? Transport managers should remember that a safety-critical defect on a PMI means the vehicle was not roadworthy and could have attracted a prohibition."

Training and culture

On the subject of drivers' hours, Rooney adds: "Matters should be addressed through training, proper management by the transport manager, and incentives. Drivers need to understand that taking their appropriate rest is more important than making a timed delivery – and that has to be the culture throughout a company."

If things do go wrong, Rooney recommends operators seek prompt advice from a trade association, transport lawyer or transport consultant, as well as having their systems externally audited. They should also look to provide refresher training for the transport manager and other relevant employees.

Finally, with the annual test playing such a key part in the OCRS calculations, operators should clearly be aiming for the highest possible first-time pass rate, every time. If you use a third party maintenance provider, they should be notifying you of any test failures. If your maintenance contract doesn't already include an agreed annual test first-time pass rate as a KPI, it should do.

With compliance support increasingly seen as an important sales pitch for service providers, it's hardly surprising that truck manufacturers are increasingly keen to publicise their respective networks' annual test first-time percentage pass rates.
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Random or targeted?

Using OCRS and targeted enforcement, DVSA has been successful in identifying and catching non-compliant operators, especially at roadside checks. However, in addition to using those enforcement tools, every year the agency also conducts a broader fleet compliance programme of roadside checks – stopping a non-targeted sample of vehicles to help determine compliance industry wide.

"We do a series of random checks annually, the purpose of which is to give us some idea as to the state of the fleet," says a DVSA spokesperson. "The percentage prohibition rate gleaned from those checks gives us a benchmark from which we set our target effectiveness."