

Guide to Maintaining Roadworthiness (GTMR): 2023

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- Where the guide says you **must** do something, it is a direct legal requirement set out in legislation, something that is required under Road Traffic law, Health and Safety legislations, or the legal undertakings to the Traffic Commissioner for your operator licence.
- Where the guide says you **should** do something, it is best practice and, while you are not required to do it, it is strongly recommended that you do unless you can demonstrate that an alternative approach provides a similar level of compliance.



GTMR: First-use inspection

New vehicles/trailers to your fleet should undergo a first-use inspection.

First-use inspection should cover all the items of an MOT test.

Not necessary where:

- the vehicle or trailer has had a recent safety inspection, or
- it's a new vehicle, it's been subject to a comprehensive pre-delivery inspection, or
- it's a rental and a pre-rental inspection record has been provided by a hire/lease company.

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GTMR: Intermediate safety checks

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With some types of vehicles and operation (vehicle used in urban areas, or vehicles used in hilly areas) some components may require more frequent checks than others – brakes, or steering.

Any additional intermediate safety checks should be documented and retained on the maintenance file.

It should be clear on the documentation these are an intermediate safety check and not a full safety inspection.

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- The transport manager, responsible person or delegated individual must have access to the completed safety inspection sheet or electronic record before the vehicle returns to service.
- By exception to the above, provide written confirmation that the vehicle is declared roadworthy before the vehicle returns to service.

Q) Is your process compliant?

If not.

Q) How will you ensure you are compliant?

Action taken on faults found

Check No	Fault No	Action taken on fault	Rectified By

Part 4 – Declaration

"I consider that the above defects have been rectified satisfactorily and this vehicle is now in a safe and roadworthy condition."

Name

Position

Signature

Date

Note: It is always the responsibility of the operator that the vehicle is in a

GTMR: Towing another company's trailer

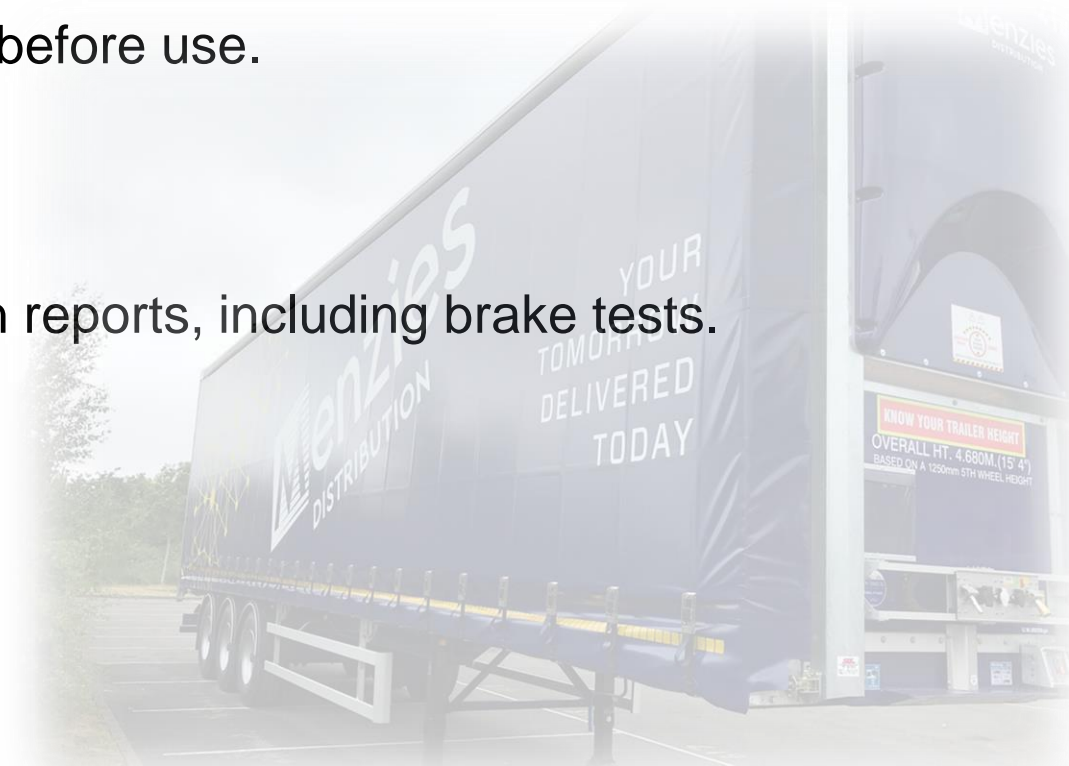
The operator must make sure that the trailer is safe to use and inspected on the agreed frequency.

The traction operator is responsible for:

- Carrying out a walkaround check
- Recording any defects and how they were repaired before use.

Also have access to:

- The safety inspection interval.
- A copy of / or access to the current safety inspection reports, including brake tests.
- A copy of / or access to current MOT certificate.
- EBPMS report if applicable.



The trailer owner is responsible for:

- The routine maintenance including safety inspections.
- Providing evidence that first-use and safety inspections have been done and there are no defects.
- Completing any manufacturers safety recalls.
- Ensuring there is a current roadworthiness certificate (MOT), where required.
- Ensuring relevant documentation is available for the trailer user.



- Where possible undertake brake tests laden, can be unladen if risk assessment conducted.
 - ❖ **From April 2025:** Laden brake tests at every safety inspection or Electronic Brake Performance Monitoring System (EBPMS) evaluation.
- Brake tests can be done up to 7 days **before** the safety inspection.
- Decelerometer test – will also require individual temperature check of each wheel.
- Brake test printouts:
 - ❖ Assessment and signed.
 - ❖ Attached (hardcopy or electronic) to safety Inspection record.



Small trailers up to 3.5t with overrun brakes should be tested using one or a combination of the following methods:

- A laden road test with brake temperatures checked.
- A static test – using the hand brake to check progressive braking of each wheel.
- A park brake drag or gradient test.



It is important that OEM technical specifications are met for correct function of Advanced Driver Assistance System (ADAS) features. In certain circumstances it may be necessary to use On-Board Diagnostics (OBD) equipment to verify the correct operation of some ADAS systems.

Any repair or calibration should be fully documented and certified to confirm the ADAS is functioning correctly.

Cameras and sensors should be checked for calibration:

- when a windscreen is replaced.
- if a device is registered as faulty.
- if the engine control unit develops a fault.
- after a wheel alignment geometry adjustment.
- after a mechanical repair affecting vehicle geometry and
- after body repairs.

Operators should ensure that all drivers, including agency staff and new employees, are familiar with the different types of ADAS fitted across the fleet.

Operators should have a documented policy on action to be taken if the ADAS system is defective or is deactivated.

Guidance for workshop staff on checking Advanced Driver Assistance Systems (ADAS) on HGVs

Briefing note

Advanced Driver Assistance Systems (ADAS) are becoming increasingly more common on today's trucks and trailers; however, there is very little guidance available from manufacturers or the authorities on how to check these systems. Logistics UK has worked with its members to produce some simple guidance on checking these systems which we hope other users will find of use. Please note, this guidance is correct at the time of writing, though new systems may have been developed and fitted to vehicles since this publication.

Warning lamp confirmation of operation/mafunction

Most manufacturers' warning lamp systems work on a 'fill and forget' basis - the system will check itself and tell the driver if there is a problem. When the ignition is switched on, a 'system check' is undertaken. This usually results in all the 'fail-safe' warning lamps (see below) illuminating for a few seconds and then extinguishing, unless a system is active (eg, the fuel level is low or the handbrake is applied) or the system is faulty (see below left).

These warning lamp systems are all usually fitted within the driver's dashboard, but there are some that may not be (eg, close-proximity indicator lamps are fitted to external mirrors - see below) but which have the same type of checking functionality so need to be checked during the warning lamps' activation period. This may necessitate the check being performed several times (see below right).

Any ADAS warning lamps that remain illuminated may indicate a fault in the system, so should be investigated. Should the safety of the vehicle be compromised, the faults will need to be resolved before the vehicle is put into service.



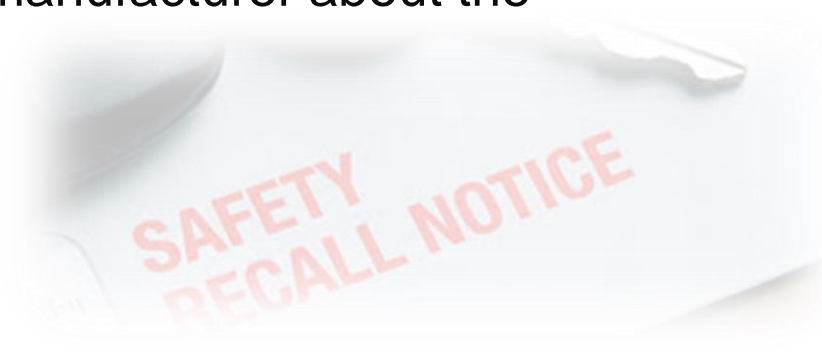
Operators must record a vehicle safety recall notification and evidence of rectification on the vehicle maintenance file.

Operators must have a robust system in place to make sure:

- vehicles do not have an outstanding vehicle safety recall.
- rectification is arranged as soon as possible when they receive a recall notification.

Operators should normally carry out rectification work at the next scheduled safety inspection unless parts are unavailable or there is a long lead time for the manufacturer's workshop.

The operator should take a vehicle out of service immediately if the recall notification is urgent until the safety recall is actioned. They should get advice from the manufacturer about the nature and severity of the recall.



Logistics UK's guidance:

- 1) What is a Vehicle Safety Defect?
- 2) What is a Vehicle Safety Defect Recall?
- 3) How will I be informed of a Vehicle Safety Defect and/or Recall on my vehicle/trailer?
- 4) Who is responsible for dealing with Vehicle Safety Defects and Recalls?
- 5) How can I find out if my vehicle/trailer has an outstanding Recall?
- 6) What should I do when I am aware of a Recall on my vehicles?
- 7) What should I do if I think my vehicle/trailer has a defect that constitutes a Recall?
- 8) What system should I have in place to address Vehicle Safety Defects and Recalls?
- 9) Where can I find more information?

Operator's guidance on Vehicle Safety Defects and Recalls

Briefing note

A number of concerns have been raised about the effectiveness of the vehicle safety defects and recalls procedures in the UK, both in regards to the process that manufacturers/producers/distributors follow in the identification and rectification of defects and in the operator's understanding of their obligations to check and manage vehicle safety defects and recalls.

Logistics UK has provided this guidance to help operators understand the current process for identifying and dealing with vehicle safety defects and the rectification action required when a safety recall is initiated.

1 What is a vehicle safety defect?

A vehicle safety defect is when there is a design and/or construction fault in a product that is likely to affect its safe operation and where the fault would pose a significant risk to the vehicle's driver, its occupants and/or others.

Where a vehicle, trailer or components manufacturer (or distributor of the products) identifies or is made aware of a safety defect, in the UK they are duty bound to report this to the Driver and Vehicle Standards Agency (DVSA). DVSA is the Government-appointed authority responsible for product safety in the automotive industry.

2 What is a vehicle safety defect recall?

Unfortunately, despite all the controls that manufacturers have in place to avoid such a situation, defects in components do materialise, and the actions that are put in place to deal with these will be dependent upon the severity of the defect. Some defects are minor in nature and may not result in a recall, but other, more serious defects do warrant a vehicle recall.

DVSA works with the vehicle, trailer or components manufacturer (or distributor) to investigate the problem, assess its level of risk and agree on a course of action relevant to the level of risk the defect poses. This will be based on the following criteria:

Action	Risk type
Safety recall (stop drive)	The definition of a safety defect is met, and there is an immediate threat to safety, so the vehicle must not be driven.
Safety recall	The definition of a safety defect is met, but the threat is not immediate or can be mitigated with 'reasonable' consumer action.
Consumer/ garage warning	The definition of a safety defect is met but can be adequately mitigated through vehicle maintenance or similar checks. May be used with a recall.
Amendment to maintenance/ servicing requirements	Used where a 'reasonable' change to maintenance or servicing requirements can detect a potential problem and avoid the defect. Not usually used in isolation due to communication challenges.

Should the criteria of a safety defect not be met, then the following action may be initiated:

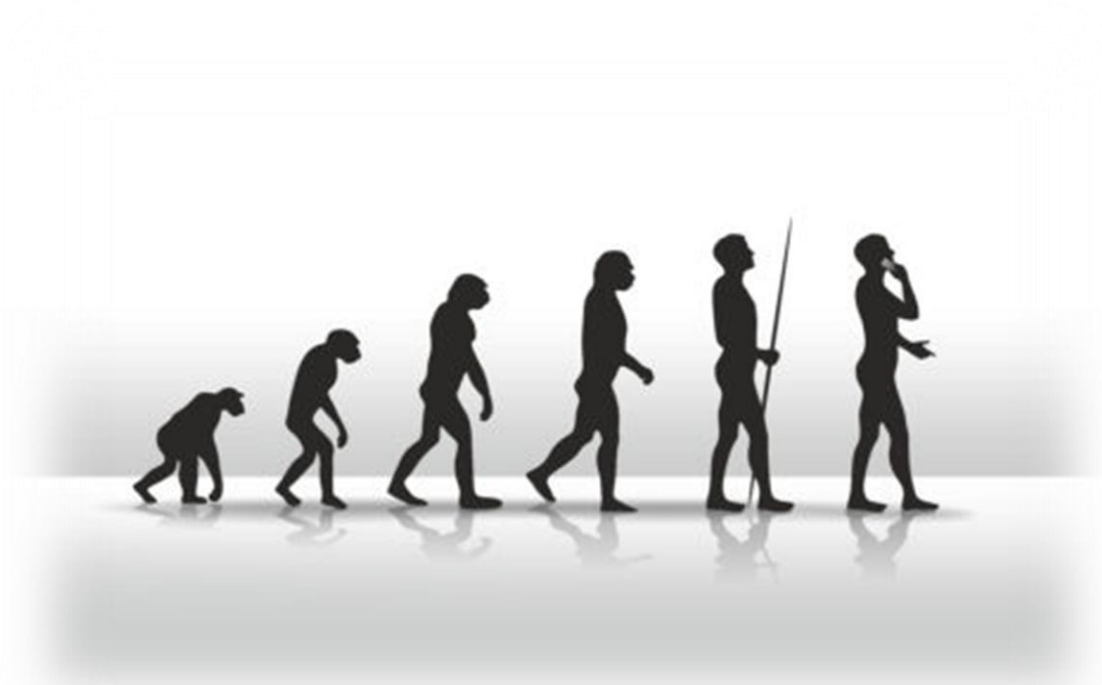
Action	Risk type
Non-safety recall (non-code action)	Does not meet the criteria for a safety defect; however, it would be in the customer's interest to have rectifying work completed through a recall.
Service campaign (no recall)	There is no safety risk, and a recall is not deemed to be in the interests of all users of the vehicle.



Q) Was what you did compliant?

Q) GTMR has changed, are you be compliant now?

Q) Will you still be compliant in April 2025?



Is it clear?

- Are your instructions clearly outlined?
- Are those involved in the process, aware of them?



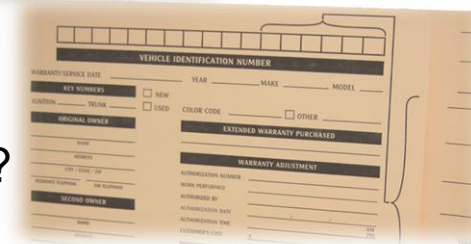
Is it happening?

- Are drivers engaged and reporting defects?
- Are reported defects, actioned and fixed?



Is it recorded?

- Is your process followed, or is it ad hoc?
- Are records kept – and available to audit?



Is it audited?

"I see no ships"

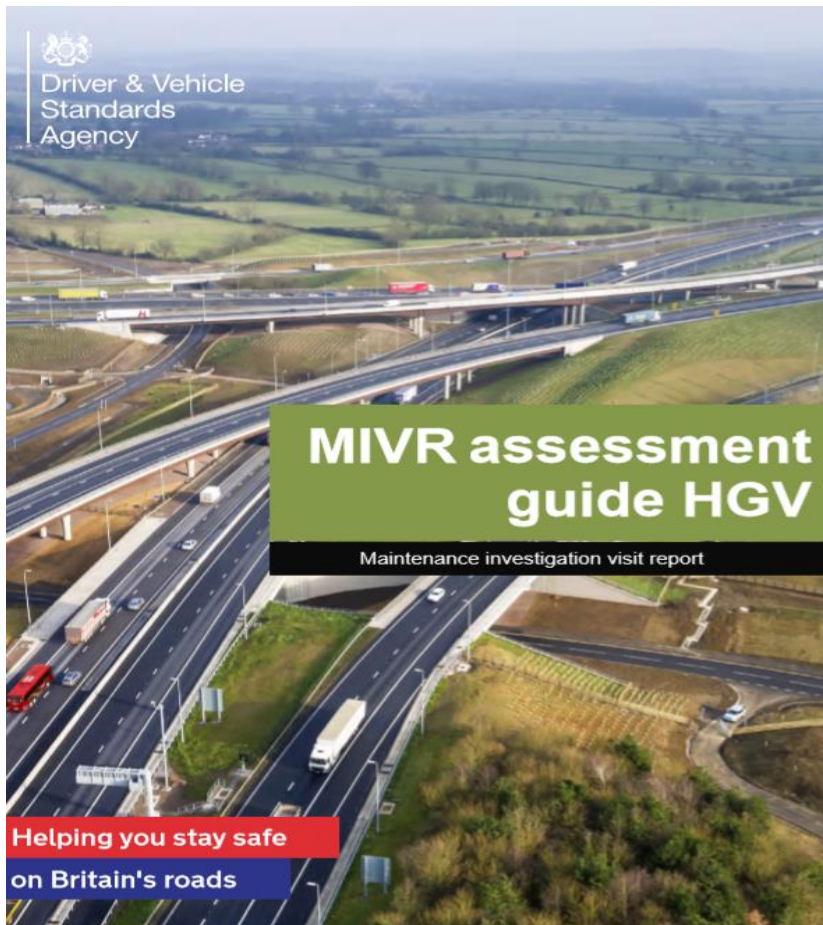
Admiral Lord Nelson – The Battle of Copenhagen, April 02nd 1801.



Is it important?.....

Maintenance Investigation Visit Report (MIVR)

- Implemented in Autumn 2020.
- Matrix available online – self audit.



- 14 Sections:
 1. Operator legal entity
 2. Condition of vehicles examined at the fleet check
 3. Operating centre
 4. Inspection & maintenance records
 5. Driver defect reporting
 6. Maintenance facilities and arrangements
 7. Vehicle Emissions
 8. Wheel & tyre management
 9. Load security / Public service vehicle accessibility (PSVAR)
 10. Prohibition assessment
 11. Security requirements
 12. Previous reported shortcomings, conditions & undertakings
 13. Transport manager / responsible person
 14. Request for explanation response (where applicable)
- Each question is individually assessed and can score either:
 - Satisfactory
 - Mostly satisfactory
 - Unsatisfactory
 - Report to OTC

Satisfactory

Report submitted – **case closed.**

Unsatisfactory

Operator required to respond in writing to reported shortcomings (14 days):

- Satisfactory response with acceptable evidence – **case closed.**
- Satisfactory response with assurances, case deferred for a Follow-up Desk Based Assessment (F/U DBA) in six months – **case deferred.**
- Remote Enforcement Office (REO) F/U DBA after six months is satisfactory – **case closed by REO.**

Report to OTC

- As a result from significant shortcomings.
- Unsatisfactory response to reported shortcomings.
- Most serious infringement (MSI).
- TC requested MIVR.
- Unsatisfactory variation MIVR.
- Unsatisfactory; REO; follow-up visit; desk based assessment outcome for deferred unsatisfactory case.





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Thank you