



# Seat belt wearing – exemption while undertaking deliveries or collections

IOSH response to the  
Department for Transport  
Consultation exercise

consultative  
exercise  
14 November

03



## About IOSH

The Institution of Occupational Safety and Health (IOSH) has 27,000 members working across all employment sectors and is Europe's largest body for individuals involved in occupational safety and health. A Chartered, 'not for profit', registered charity, we have strong links across the globe including Asia, Australasia, Europe and North America. We welcome this opportunity to participate in the Department for Transport (DfT) consultation exercise on seat belt wearing exemption while undertaking deliveries or collections. The consultation paper was circulated to our members via the Specialist Groups network and through the IOSH Council of Management and the response below has been formulated from the feedback received.

## Comments

It is important to clarify the area of seat belt wearing exemptions in order to reduce the current levels of fatalities and injuries to employees and self-employed workers who are involved in the delivery and collection of goods. At the same time, it is also important that any legislative change in this area is practical and realistic, as if it is not, it is likely to be ignored and no societal benefits will accrue.

On examination of the proposal to state a maximum prescribed distance for seat belt wearing exemption IOSH members felt that a *minimum of 20 metres and a maximum of 100 metres* would be the most effective distances. IOSH members also raised the following points for consideration:

- the actual distance travelled without a seat belt may not be as important as the speed at which the vehicle is travelling. It was suggested that instead of a maximum prescribed distance, a maximum speed limit of, for example, 2mph might be more appropriate. This would effectively control the distance travelled as longer runs would require a seat belt if the driver wished to progress at a reasonable speed.
- from an operational perspective, it may be the case that for a worker employed in a position that involves frequent stops, constantly putting on and taking off a seat belt could produce health and safety or other problems.
- the principles of avoiding/minimising risk and controlling residual risk apply equally to at-work road-risk as to other work-related risk and should be subject to a risk assessment. If this were the case, the maximum prescribed distance would be decided as part of this risk assessment and would vary depending on the job and the individual performing the task, rather than be set in stone and applicable to all situations.

**Consultations contact**

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