



Solstice House
251 Midsummer Boulevard
Central Milton Keynes
Milton Keynes
MK9 1EQ

6 April 2021

Dear Sir

Re: David Edwin BLINMAN (deceased)

I write further to your letter of 25 February 2021 to address the matters of concern you have raised.

Firstly I would like to make clear how seriously my organisation and I have taken this matter. As a business, we are committed to a Safety First culture and we are engaged in leading the agenda in fleet safety across the industry. Safety is a core value of our business.

DHL Supply Chain (DSC) prides itself in being an industry leader in wheeled asset safety across its business and strives for continual improvement of both processes and technology. Any technological developments to improve safety are carefully considered and adopted as appropriate through on-going review of the specification for replacement fleet vehicles, taking into account and carefully balancing any enhancement offered against impact on driver distraction.

DSC has been an early adopter of safety technology beyond statutory requirements, including Advanced Emergency Braking Systems (AEBS). This operates to reduce the speed of the DSC vehicle without driver input, reducing the speed of and potentially avoiding impact between vehicles. DSC also fitted the additional class VI mirror to all in scope equipment 12 months in advance of the legal requirement to do so.

As part of the Asset Management Centre of Excellence process, DSC first standardised a base vehicle safety specification in 2012. Following any incident review or development of new technology, this specification is updated and applied for any DSC fleet procurement, which is under constant review.

Specifically in respect of the implementation of camera technology, I can advise you that since review of the DSC specification in 2015, all rigid vehicles procured directly by DSC have a 4 camera system, including a reversing camera. Where asset selection is not within the control of DSC, such as customer specified fleet, DSC is committed to strongly influencing and promoting our specification as preferred choice.

DSC is currently evaluating a Bluetooth reverse camera system which could support the adoption of 4 camera systems on articulated vehicles as a result of technological advances. The



product is in final developmental stage with the manufacturer and DSC is awaiting delivery of the production model for field trials, hoped to be received to commence in field testing by end of June 2021.

Turning now to address your letter; firstly I would like to thank you for raising these concerns. As set out below, DSC was already conducting a fundamental review to its Delivery Point Risk Assessment (DPRA) Safety Arrangement to create a more consistent UK and Ireland (UKI) standard. The matters identified at the Inquest and within your letter have been used to inform and develop the process further before implementation.

- 1. DPRAs do not mandate discussion with and documenting of, by the Risk Assessor, the views and experiences of the store owner/operator, nor of the drivers regularly delivering to the store, in relation to any particular hazards, or concerns. The Risk Assessor may not, therefore, be sufficiently informed of material which might assist him, or her, in completing an adequate risk assessment.**

All DSC Nisa account Risk Assessors were trained on the DPRA process, which was first launched in 2013. This required them to obtain information from the store owner and operator, as well as to consider any driver reports and previous incidents. The Nisa DPRA process is intended to trigger consideration of the DPRA review as a result of any changes to the location or delivery requirements, following an incident and also on periodic review. There is also a procedure in place to consider a review of a DPRA following any driver hazard reporting, which may involve re-assessment of the delivery point if deemed appropriate.

In addition, the fundamental review of the UKI DPRA Safety Arrangement has been completed and the standardised Safety Arrangement will be released to the DSC UKI business by the end of April 2021. This new Safety Arrangement is to be adopted as consistent best practice across the business in the individual contract DRPA processes. We have ensured that lessons learnt from the Inquest have been comprehensively reviewed and are in the process of being included before the UKI roll out.

The DPRA process for the Nisa account has been specifically reviewed by the contract's Account Management, under the direction of the Vice President of Operations and in conjunction with their Safety Team. The revised Safety Arrangement has already been introduced for that account. The Nisa contract has around 4,100 delivery points and a risk based approach will be adopted to reviewing order of the DPRAs for the account. We anticipate that this process will take in the region of six months to complete across all delivery locations and will be managed and controlled by a weekly management call containing representatives from all operating locations.

Whilst the training and instruction provided to DSC Risk Assessors on the Nisa account already required them to liaise with the store owner and operators and to take account of driver reports of issues and accident/incident data when reviewing a DPRA. The revised Nisa DPRA process will explicitly require the DSC Risk Assessors to collaborate and cooperate with the store and to record those findings, as well as any driver issues or accident/incident data.



For all new Nisa delivery locations, the process required the store owner's involvement, with the new assessment completed by or in conjunction with an experienced driver to confirm the DPRA is fit for purpose.

In order to capture any issues with a delivery point, there is a process of driver debriefs at the end of each shift where any issues that arise from that day are encouraged to be reported. There is also a hazard reporting process and the requirement for drivers to conduct dynamic risk assessment if the DPRA cannot be followed on arrival at a delivery point.

All Nisa account drivers will be briefed on the updated DPRA process and reminded of the importance of reporting any hazards that they encounter at a delivery point so that the review process can take place. That briefing for the Nisa account has commenced, covering approximately 600 drivers and will be concluded by Friday 9 April 2021. Any hazard reports or driver concerns raised will be used to inform the prioritisation of DPRA reviews.

The UKI roll out of the revised Safety Arrangement, incorporating early feedback on the Nisa account implementation, will be released by the end of April 2021 alongside the driver re-briefing about the importance of hazard reporting.

- 2. The Mitigating/control measures set out in the 2015, 2017 and 2019 DPRAs do not adequately address the risks of vehicles colliding with pedestrians, in circumstances where the latter are located within vehicle blind spots. The measures, I understood from the evidence of the 2017 and 2019 assessor, remain unchanged, and I believe, may well extend to all such DPRAs, and not limited to Blandy Terrace Delivery Location**

Across the Nisa account there are an average of circa 15,000 deliveries per week and to date an incident of this nature has not been sustained. DSC control measures take account of the risks to vulnerable road users at delivery point locations, including during reversing manoeuvres. The review of the UKI DPRA Safety Arrangement was already intended to adopt best practice across the business in controlling these risks, including ongoing driver training and development, hazard perception, the importance of assessing the manoeuvre and stopping to get out and look before or at any point during the manoeuvre, if required.

DSC proactively developed a slow speed manoeuvre module in 2020 as part of its continual drive to improve transport safety and this was launched as part of our sponsorship to the Brake Road Safety Week in November 2020. This the module now forms part of the 2021 DSC Driver CPC programme of training, covering circa 8,500 drivers in total. This includes the reversing manoeuvre.

All delivery manoeuvres across the UKI business are governed by a hierarchy of controls measures that deal with the risks involved in the delivery:-

- Eliminating reversing where possible;
- Limiting the distance reversed;
- Delivery day or time
- Dynamic Risk Assessment
- All vehicles are fully compliant with the regulations currently in force;



- Use of Driver primary mirrors, supplemented by wide angle, kerb view (Class V) and front bumper (Class VI) mirrors;
- Audible reversing alarms upgraded to white noise as more discernible to a wider group than standard alarms;
- Radio mute on reverse gear selection;
- Ongoing Driver training including situational awareness;
- Regular Driver assessment

As part of the review of the UKI DPRA Safety Arrangement, each contract will identify any contract specific additional controls for vehicle manoeuvres at delivery points based on the operation, fleet size and scale. On the Nisa account the available control measures in addition to the above, will include:-

- Vehicle selection (size and/or specification)
- Reversing camera
- Driver's Mate
- Store Assistance
- Physical Aids/Equipment e.g. signs or cones

3. 360 degree checks cannot be undertaken by a driver, whilst in the process of conducting a reversing manoeuvre, unless mitigating measures such as reversing cameras or banksman are deployed

The reference to a 360 degree check purely refers to situational awareness at a delivery point encompassing the approach to the delivery point, positioning the vehicle for the reversing manoeuvre whilst taking account of all surroundings, using all mirrors and if required and the get out and look process to plan the approach.

We take on board the Coroner's comments and whilst driver spatial awareness remains vital at the delivery point and the term 360 degree check was understood by the Nisa account to reflect the process above, the term needs to be used appropriately. In order to achieve this specifically on the Nisa account, Risk Assessors will be made aware through the revised Nisa DPRA process as to the need to use clear terminology when describing the delivery control measures.

If reversing is unavoidable, clearly it is not possible to remove all blind spots on reversing goods vehicles, but DSC will continue to assess and adopt any technology that is proven to be effective without being outweighed by additional driver distraction issues. Drivers are aware that if they have any safety concerns with a delivery to raise the issue via a hazard report, so that DHL can consider ways to mitigate the risk. Every DSC driver has the authority to abort a delivery on safety grounds if they deem it necessary.



4. Risk Assessors should have regard to current applicable guidelines, such as here, Rule 202 of Highway Code, when assessing risk and completing the DPRA

DSC Risk Assessors are trained to take account of all applicable guidelines when carrying out the DPRA and to implement appropriate control measures to reverse risks when carrying out all manoeuvres at a delivery point. This will be reiterated in the implementation of the revised UKI DPRA Safety Arrangement and that as per the hierarchy of controls, starting with eliminating reversing where possible. I hope that this response satisfies your concerns and assures you that DSC places paramount importance on safety. DSC is committed to continual improvement of its processes and will take on board all the lessons learnt in this incident, not just on this account but across all transport locations and our driver population. DSC continues to actively promote the adoption of safety technology within the industry and amongst our customers and is committed to using this incident to drive safety improvements further.

I trust this response answers your concerns, but if you have any further questions I am happy to respond to those in due course.

Yours sincerely

A handwritten signature in black ink, appearing to be 'A. J.', is located below the 'Yours sincerely' text.


CEO

DHL Supply Chain Ltd UK & Ireland