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& Compliance

# Managing Grey Fleet Risk the Easy Way

How utilising automated checks and tailored training can help businesses reduce the risk associated with employees driving their own vehicles



# Foreword

Grey fleets can be seen as the easier and cheaper alternative to running, owning or leasing a company car fleet, but research from TTC Group suggests businesses are failing in their duty of care to these drivers. As a result, they are putting themselves, their grey fleet drivers and other road users at unnecessary risk. The reality is that more deaths occur from at-work road trips than at the workplace itself. A study on behalf of National Highways and the charitable partnership RoadSafe (2022) found that nearly one third (29%) of all road fatalities and 21% of all casualties occur in driving-for-work collisions.

TTC's research confirms that even the most basic driver validation checks are being overlooked, including verifying a valid MOT, insurance and tax, with 18% never checking, 37% checking licences when new employees join the business and only 33% checking these essentials regularly.

It is encouraging to see that most businesses relying on grey fleet do invest in training for these drivers, but there is much room for improvement. A third of businesses help with training for vulnerable drivers or those who commit speeding, drink or drug offences, and just over half provide training specifically designed for grey fleet drivers.

Resources are stretched in many businesses, as demonstrated in this research with lack of resources cited as the most common challenge in grey fleet management, cited by one in three businesses as a key challenge in monitoring and managing driver information and performance. It is, therefore, understandable that even the most willing business may struggle to keep on top of regular checks and training without outside help.

With approximately 14 million grey fleet drivers on UK roads, a lack of training, appropriate insurance or a roadworthy vehicle could put the driver and other road users at significant risk. And then of course there is the business risk resulting from any collision, conviction or driving ban. With the far-reaching and potentially damaging impact of internal resources being stretched to their limits, many businesses are seeking external support to improve compliance and cut risk.

Clearly businesses need to reassess their grey fleet priorities to remove the grey areas to ensure their drivers are as safe as possible when driving for work purposes. This research highlights the key challenges, risks and opportunities for support and improvement available to businesses today.



**David Marsh**  
CEO - TTC Group

## Lack of resources is the main challenge in managing driver information and performance

20%

of businesses never check driver licences and insurance cover them to drive at work

Just  
33%

of businesses monitor status of employee drivers' licences

## Key findings

The latest research conducted on behalf of TTC Group sought feedback on current grey fleet practices from 300 senior managers, nationwide, responsible for managing grey fleet vehicles. As well as dedicated Fleet Managers, the panel included managers responsible for Human Resources, Procurement, Transport and Facilities, as well as Office Managers and General Managers.

- Just one in three businesses regularly check grey fleet drivers are appropriately insured, and their vehicle is taxed and MOT tested. 37% only check when an employee first joins the business, and 18% never carry out these essential checks.

18%  
never check

- 37% of businesses check employee driver's licences, but only 21% check the licence covers the relevant vehicle category and 17% check for points on licences.

17%  
check for points

- Only 21% of respondents are 'very confident' their grey fleet drivers provide updates regarding the driver and vehicle (such as new points on their licence or their vehicle failing its MOT).

21%  
are confident

- 51% of businesses invest in training for those who use their own car or company car for work-related journeys and use their vehicle to transport other employees or work-related items

51%  
invest in training

- Outdated systems, lack of knowledge and lack of available time are common fleet concerns, showing that businesses face a multitude of compounding challenges when it comes to staying on top of grey fleet checks.

- Just 31% support driver rehabilitation through training for those who had received a speeding or drink/drug driving offence – if they are aware of the offence, of course.

31%  
support rehab training

# Continuum

Powered by 



## Continuum platform

**The powerful online data platform which lets your business save time and stay within the law by managing your entire driving community in one place.**

TTC delivers driver awareness and improvement courses to over 500,000 employees each year and manages more than 750,000 vocational drivers daily. At the heart of its compliance and driver training solutions is Continuum, an end-to-end risk management platform.

The powerful Continuum platform is the industry's only all-in-one tech-driven, cloud-based driver risk and compliance tool, combining decades of TTC expertise with data and automation to improve performance and reduce cost while freeing up resources to focus on the core business and fleet management requirements.

Designed by safety experts and data scientists, Continuum aggregates all driver risk and compliance data, then uses algorithms and automation to extract insight, carry out tasks, send alerts and make training recommendations.

Users simply add drivers' names and contact details and Continuum does the rest, from securely gathering driver eDeclaration, licence data, vehicle details and training records to automatically chasing and reminding them to keep them up to date and provide new documents. This makes managing the ongoing compliance of grey fleet drivers much easier for customers, helping businesses carry out regular checks without the administrative burden.

To further improve processes, the Continuum mobile app simply and cost-effectively, positively influences driver behaviour, with the option to enable clever in-built telematics that detect key traits, including harsh acceleration, cornering, and braking. Users can provide training, including eLearning, based upon real-time dynamic data, as well as capture vehicle defects via image capture and track journeys helping streamline expense reporting, all whilst on the go.

TTC's automated licence checking significantly improved efficiencies for the Northern Lighthouse Board (NLB), which regained 37 workdays, or 2.8 working weeks' worth of time in 2022. NLB is now also able to carry out checks on employees holding non-UK licences, which had previously been very difficult to do with accuracy.



Northern Lighthouse Board

**37**  
work days saved  
in 2022



However, the benefits extend beyond significantly improving driver safety and fleet efficiency. The financial savings in own fault driver related claims alone for Willmott Dixon exceeded £250,000 in 2023, following targeted training and eLearning courses for its higher risk drivers.

  
**WILLMOTT DIXON**  
SINCE 1852

**£250k+**  
saved  
in 2023\*



\*£250k cost saving in own fault driver related claims Yr 1 to Yr 3  
Willmott Dixon Internal data own fault driver related claims cost savings  
comparing 2021 to 2023

# How Grey is your Fleet?

When employees are at work, their employer is responsible for their health and safety. 'At work' includes driving between work locations – to and from different sites, offices or stores for any work purpose – however that employee travels. Public transport, a company car, a vehicle from a pool of company cars, a private vehicle for which the employee receives an allowance instead of having a company car, or even just a private vehicle that the employee occasionally uses for work travel – regardless of whether they reclaim mileage and fuel costs.

Managing risk to the employee is relatively straightforward when it comes to using public transport or fleet vehicles, which are regularly checked and maintained by the business. However, grey fleet appears to be something of a grey area for many businesses. Although most of the businesses we spoke to during our research confirmed they are aware of their responsibilities to grey fleet drivers, just one in three conduct regular checks to ensure MOT, insurance and tax are all in place and up to date.

## The legal requirements of Grey Fleet

### The Health and Safety law: the basics

- **“In general, health and safety laws apply to all businesses.** As an employer, or a self-employed person, you are responsible for health and safety in your business.”

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- “If you have fewer than five employees you don't have to write down your risk assessment or your health and safety policy.”

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- More information is [available here](#).

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This guidance ensures that all employers risk-manage their grey fleet drivers and vehicles in the same way as they currently do with drivers of company-owned or leased vehicles. The advice is clear; action must be taken.

**If an employee is officially home-based, a business journey to any location – even their employer's own offices, however close – is considered driving for work.** In June 2020, during the first COVID-19 lockdown, 38% of workers were 'fully remote', but figures from Forbes show that figure now stands at just 14%. 26% of employees are now 'hybrid' workers, combining working from home and in the office. As businesses return to roles being office-based and running more in-person meetings, driving for work is increasing.

### The Health and Safety law: Driving and riding safely for work

Information for employers, published by the Health and Safety Executive, states:

- “As an employer, you must manage health and safety risks to workers who drive a vehicle or ride a motorcycle, other powered two-wheeler or bicycle on the road as part of a work activity. **Health and safety law applies to work activities on the road** in the same way as it does on a fixed site.”

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- **“The law applies to both company and grey fleet vehicles.** A grey fleet vehicle is owned and driven by a worker for business purposes. Vehicles used under cash allowance schemes are grey fleet too.”

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- “Commuting to work is not generally classified as driving for work, except where someone's journey starts from their home, and they are travelling to a work location that is not their normal place of work. **Health and safety law does not apply to commuting.**”

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- See this [website](#) for more information

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# Double danger: Failing the checks and failing to check

In 2023, TTC carried out over 70,000 checks on grey fleet drivers and vehicles, and one in five of these results in failure. Nine in 10 of these failures occur due to lack of appropriate insurance cover for driving private vehicles for work purposes.

With an estimated 14 million grey fleet vehicles on UK roads, this data highlights the significant number of drivers and the businesses they work for, that are neglecting their duty of care. If just one in three businesses regularly checking their grey fleet has appropriate insurance, tax and MOT, as our research found, that equates to more than 9 million grey fleet drivers not being checked as per the legal requirements.

Business car insurance covers a private car driver to use their car for any work-related purposes, over and above commuting. The driver is responsible for ensuring business insurance is in place, but it is a legal requirement under the Health and Safety at Work Act for any grey fleet vehicle to be verified roadworthy and legal by the driver's employer. Organisations must be able to evidence that their grey fleet employee holds a valid driving licence, business insurance, vehicle MOT and that the vehicle is taxed.

The one-in-five failure rate hasn't improved since TTC voiced concerns a decade ago, showing there is still a fundamental need for companies to employ robust and efficient processes to manage driver compliance. Clearly asking an employee if they have business insurance is not sufficient, so businesses must consider a robust and regular document checking process to ensure the driver and business are protected.

The latest research confirmed that businesses are not doing enough to meet their obligations to protect employees on the road. Most businesses are aware of their responsibilities regarding tax, business insurance and MOT, but just 33% carry out regular checks to ensure these are in place. 37% only carry out such checks when an employee first joins the business, and 18% never carry out these essential checks.

# What gets in the way of Grey Fleet monitoring?

Many businesses struggle to carry out the necessary checks due to what appears to be a series of insurmountable hurdles. Overall, a lack of resources such as a dedicated fleet manager was the most common hurdle, with 32% of businesses naming it as one of their top three challenges. Driver resistance and lack of support from senior management hold back a similar number of businesses, receiving 30.6% and 30.3% of the votes, respectively. Outdated systems, lack of knowledge and lack of available time received almost as many votes, showing that businesses face a multitude of compounding challenges when it comes to staying on top of grey fleet checks.

Interestingly, despite their dedicated role taking responsibility for the fleet, 30.6% of fleet managers cited lack of resources as one of their top three challenges, second only to driver resistance which was named as a top challenge by 31%. Lack of management support came in third, with 28.2%.

For office managers, outdated or basic platforms that are not user-friendly were the greatest challenge to overcome, receiving 57.1% of votes, followed by resources (42.9%) and driver resistance (39.3%).

# A case study



Northern  
Lighthouse  
Board

208  
lighthouses

174  
buoys

170  
staff



As the General Lighthouse Authority for the waters surrounding Scotland and the Isle of Man, the Northern Lighthouse Board (NLB) provides a vital safety service for mariners. It is responsible for the superintendence and management of 208 lighthouses and 174 buoys as well as providing radio aids to navigation (AtoN). At the heart of its operation is a dedicated team of engineers, technicians, mariners, retained lightkeepers and support staff, many of whom perform their NLB role part-time, often alongside another occupation such as farming, fishing or emergency services, and can be required to combine air, sea and road travel, often on remote terrain and in perilous weather conditions.

In 2022, NLB recognised the need to go over-and-above in responsibly safeguarding its employees when on the road. Since then, NLB has embraced TTC's licence checking, risk assessment and training services as a matter of course, protecting employees today and into the future.

When employees are required to drive for work, it adds a layer of complexity to compliance requirements. Licence checking, in particular, is often a time-consuming task when completed manually, but crucial in determining if employees are legally allowed to drive on the UK's roads. Working with TTC and its automated licence checking service, NLB has significantly improved efficiencies and regained almost three working weeks of time.

*"The partnership with TTC has been a significant step-change in how NLB today manages driver risk and improves safety for the benefit of our employees and those they serve."*

*"Continuum allows us to manage our entire driving community easily and quickly from a single online platform, ensuring real-time compliance with HSE legislation. Live data, visual dashboards, tasks and alerts provide accurate insight into driver compliance, building our own risk landscape which allows us to intervene with learning activities. In a nutshell, Continuum simultaneously reduces the driver risk and administration burden."*

**Trish Donaldson**, Compliance Officer at the Northern Lighthouse Board

# Trust or evidence?

Asking employees if they have the right insurance, a valid MOT and have paid their tax is a start, but should businesses risk taking each employee's word for it? Employee drivers may not deliberately provide inaccurate responses – they may be unaware of the requirements, especially regarding business car insurance. Evidence is essential to ensure a business is always meeting its duty of care and protecting its employees – not to mention the business itself.

According to our research, businesses are all too willing to accept an employee's confirmation without carrying out independent verification. Between 20 and 30% of respondents require any form of evidence from their employee drivers. Vehicle condition and appropriateness of the vehicle are marginally the two most sought-after pieces of evidence: 23% will ask for photographic evidence that the vehicle is not damaged, while 21% will check the vehicle model is suitable for the job requirements.

Just 21% check the driver's licence category is appropriate for the vehicle they are driving, despite 37% confirming they do check licences. Just 21% carry out the free online check to find out if the vehicle has a valid MOT, and only 17% look into the vehicle's service history. Only 18% check that the licence is valid and 17% check for points on licences.

Although a wide range of evidence is being requested, the total number of requests are relatively low across the board. Without verifying the suitability and condition of a vehicle, or a driver's suitability to drive that vehicle, businesses are putting themselves and their drivers at serious risk.

20% of respondents confirmed they conduct licence checks through Gov.uk and 17% use an independent licence-checking service. It seems very few businesses are taking advantage of the time and resource savings offered by automated checking. TTC's Continuum platform helps businesses minimise the risk of employees driving without insurance, MOT or tax.

Continuum's Grey Fleet licence, MOT & insurance Checks automatically confirm vehicles are roadworthy, insured for business use and taxed, as well as making sure the driver is legally licensed and entitled to drive it for work. The platform also monitors for changes and alerts the fleet manager or other nominated person of any relevant changes.

# Staying in the loop

The longer a driver is with a business without having had their licence, MOT and insurance checked, the easier it is for changes to go unnoticed. Someone who joined the businesses with a clean licence, valid business car insurance and a valid MOT certificate even a few short months ago could have had a change in circumstances that changes one or more of these factors.

A couple of speeding fines, a drink driving offence, an MOT failure, a change in insurance provider and removing the business element of cover to reduce the premium, for example, are all occurrences that could come about without an employer being notified. Unless they carry out regular validated checks.

55% of those surveyed have some degree of confidence that grey fleet drivers are sharing relevant and up-to-date driver and vehicle information, although only 21% said they are 'very confident'. 22% are not confident. Office managers are the most confident, with 82% saying they are confident overall, and 54% 'very confident'.

# The question of storage

Having gathered the relevant information and evidence, businesses need to store it securely in line with data protection regulations. They also need easy access to the data whenever necessary, as well as to keep it up to date. This has the potential to be a significant resource and administration burden. Only 33% of respondents to our survey benefit from a systems-based solution to record and store driver information. HR Managers more commonly rely on such a solution (58%), followed by Fleet Managers (49%). 50% still rely on taking copies or scanning documents and storing them for future reference and 15% manually maintain a spreadsheet, adding further to the administrative burden.

Automated systems such as TTC's Continuum platform reduce this admin burden, ease resource concerns and enable automated reminders for updates and gathering of new information. Data is stored securely and compliantly and is instantly accessible whenever the need arises. The system can contact drivers directly, to request updated documentation, reducing resource requirements still further and freeing up the team to focus on other areas of their role.

Designed by safety experts and data scientists, Continuum seamlessly aggregates driver risk and compliance data, then uses algorithms and automation to extract insight, carry out tasks and send alerts.



# A case study

With more than 3,000 vehicles on its fleet, including grey fleet vehicles, the Willmott Dixon Group has been working in partnership with TTC to manage its fleet compliance and driver risk since 2021.

The first step to enhancing Willmott Dixon's fleet risk management was to centralise selected driver information within TTC's online data platform, Continuum. This provided the foundation on which a bespoke end-to-end compliance and training solution was built, from licence checks through to personalised training.

As a result of the collaboration the number of new driving offences and own fault claims against Willmott Dixon fleet and grey drivers has halved, and the collective number of points on employee driving licences has fallen by almost a third.



*"Before we worked with TTC, our fleet and driver risk management and compliance activities were not monitored robustly, and we knew we could do much better for our employees and our business. TTC's driver and risk management platform, Continuum, has provided a greater level of visibility of our fleet compliance, coupled with the addition of identifying high-risk drivers we are in a far better position to manage our people and predict which of our people need some level of intervention."*

*"Implementation of TTC's fleet management programme proved to be an immediate and lasting success. The programme has not only changed corporate culture within our business, but it has also raised awareness of driver safety and compliance for employees at all levels. It has also reduced our risk profile by reducing safety incidents, speeding fines and insurance claims."*

**Mark French**, Chief Health, Safety and Environmental Officer



# Support your drivers

As well as checking drivers and vehicles are road-worthy, businesses can provide additional support to reduce risk. Starting with a robust and detailed driver policy is the most important step, ensuring grey fleet drivers know what confirmations they must provide before driving for work, what is expected of them when on the road, and what their responsibilities are going forward.

Our research found that just 33% of businesses ask grey fleet drivers to sign and adhere to a driver policy.

Driver training is an essential tool to help drivers reduce their own risk, giving them the information and tools they need to make informed driving decisions, stay safe on the road and drive more economically.

99% of respondents taking part in our latest research confirmed they proactively promote responsible and safe business driving and that training is on their agenda. 33% of those surveyed confirmed business leadership is committed to driving change through actions, not words.

51% invest in training for those who use their own car or company car for work-related journeys and use their vehicle to transport other employees or work-related items but only 31% confirmed they support driver rehabilitation through training for those who had received a speeding or drink/drug driving offence. 39% provide post-training information to drivers to ensure they retain and act on new insights and knowledge gained.

Beyond the basic training on company policies, loading and lifting, for example, there is no one-size-fits-all training solution. Each driver presents a different risk, requires a different focus for ongoing courses. With a background in pioneering driver education and behaviour change over 30 years, TTC has put together a range of engaging and interactive group and 1-2-1 training and coaching delivered in a range of ways, to suit every business and every individual employee.

As well as driver workshops and on road training, TTC provides flexible, accessible e-learning courses. Connected via Continuum, the courses are automatically timed and tailored to each driver using insight from their personal risk assessment. Targeted bite-size optional and compulsory training packages are provided directly to drivers, and their records automatically updated when training is complete.

# Conclusion: No more Grey Fleet grey areas

Managing a grey fleet is no easy task, but incorporating grey fleet management into driver risk management services brings significant benefits across the board. Organisations can help mitigate vehicle safety risk by automatically highlighting potential risks and helping them to implement appropriate risk assessment and monitoring procedures.

Grey fleet management services often include assessing the competency and suitability of employees' personal vehicles for business use. This evaluation ensures that vehicles are adequately maintained, roadworthy, and suitable for the intended purposes, reducing the risk of accidents caused by poorly maintained or inappropriate vehicles.

Organisations also benefit from using fleet management services to establish clear policies and procedures for employees using personal vehicles for business purposes. These guidelines can include requirements for insurance coverage, maintenance records, and driver responsibilities, ensuring consistency and reducing potential liabilities.

TTC helps businesses manage driver compliance, risk and learning through its simple-to-use, cloud-based Continuum platform, which reduces the time and complexity of conducting and updating checks manually. By helping to protect its clients and their drivers from unnecessary risk, TTC simultaneously frees up resources to focus on the core business and fleet management requirements.

## The benefits of fleet management via Continuum



### Profile driver risk 24/7

Accurately profile individual driver risk and verify compliance, so you can take timely, positive, targeted action



### Save time and money

Automate many of the manual tasks your team hates most, like filing, scheduling rechecks, managing training records and chasing renewals



### Negotiate lower insurance

Evidence improved driver behaviour with accurate data-led performance intelligence and reduce gross written premiums



### Take timely interventions

Access exceptional management information 24/7 via your intuitive dashboard, guaranteeing timely action with task reminders and red flag alerts



### Reduce driver downtime

Smart tools to help drivers upload key documents and access personalised training on-the-go without time lost travelling to the office

## Why businesses choose TTC

### Cut risk, stay compliant, save money

40%

Typical reduction in driver incidents after using Continuum

3

Seconds average time to receive and accurate licence verification

37

Working days a year saved by one customer by automating licence checks

51

E-Learning and video modules accessible within Continuum