



SPECIALIST TRANSPORT & LOGISTICS AWARDS



**EMPI Awards**  
Knowledge Innovation

# RoadSURE Pro

## RoadSURE Pro™ Employer Compliance Guide

STL Awards has produced this guidance that explains your employer legal duties for drum mixers and demonstrates exactly how RoadSURE Pro™ directly satisfies each duty with auditable, practical evidence.

The scheme is already trusted by many operators across the UK and is fully aligned with DVSA, HSE, Senior Traffic Commissioner Statutory Documents and PUWER requirements.



**Drive Competence. Deliver Safety.**

## Why Drum Mixers Demand a Different Approach

Drum-type ready-mixed concrete mixers are not simply large HGVs. They are complex mobile work equipment carrying a dynamic, shifting load that fundamentally alters vehicle behaviour at every stage of operation.

When fully loaded, the centre of gravity rises sharply, dramatically increasing rollover risk — particularly during cornering, on cambered roads, and when manoeuvring on congested or uneven construction sites. The rotating drum introduces forces that a standard HGV driver is not trained to anticipate or manage. Wet concrete behaves as a viscous fluid under acceleration and braking, transferring momentum in ways that can destabilise even an experienced driver.

HSE workplace transport guidance HSG136 makes explicitly clear that generic HGV training is insufficient for operators of specialist mobile mixing equipment.

Regulators, Traffic Commissioners, and courts have all recognised that employers who rely solely on standard qualifications cannot demonstrate the *"adequate"* and *"suitable"* training required under UK health and safety legislation.

Vehicle-specific, evidenced competence is not optional — it is a legal prerequisite.

### Key Risk Factor

- **Rising Centre of Gravity:** Fully loaded drum raises rollover risks significantly
- **Dynamic Load Shift:** Wet concrete behaves as a fluid under acceleration
- **Site Manoeuvring:** Reversing and turning on uneven, congested sites
- **Drum Rotation Effects:** Continuous and increased drum movement affects vehicle stability

### The Six Legal Duties at a Glance

Six distinct areas of UK law govern how you must manage driver competence and vehicle safety for drum mixer operations. RoadSURE Pro™ has been designed to provide auditable, practical evidence against every one of them.

- Health and Safety at Work etc. Act 1974 — Section 2(2)(c)
- Management of Health and Safety at Work Regulations 1999 — Regulation 3
- Management of Health and Safety at Work Regulations 1999 — Regulation 9
- Provision and Use of Work Equipment Regulations 1998 — Regulations 4, 8, 9 and 25–30
- Road Traffic Act 1988 & Road Vehicles (Construction and Use) Regulations 1986 — Regulation 100
- Goods Vehicles (Licensing of Operators) Act 1995 & Senior Traffic Commissioner Statutory Documents

Each duty carries distinct obligations and distinct evidential requirements. The sections that follow address each in turn, setting out the precise legal standard, the underlying risk reasoning, and the specific mechanism by which RoadSURE Pro™ satisfies it with dated, verifiable documentation.

# Duty 1: Information, Instruction & Training

## HEALTH AND SAFETY AT WORK ETC. ACT 1974 – SECTION 2(2)(C)

**The Legal Duty:** Every employer shall, so far as is reasonably practicable, provide such information, instruction, training and supervision as is necessary to ensure the health and safety at work of his employees.

This is one of the most fundamental duties in UK health and safety law. For drum mixer drivers, it requires far more than the provision of a standard DCPC card or a generic HGV training.

HSE workplace transport guidance HSG136 is unambiguous: operators of specialist vehicles carrying dynamic loads require vehicle-specific, task-specific training that goes beyond what any generic training provides. Courts and enforcement authorities have found that employers who cannot produce dated, documented evidence of specific training have failed this duty, regardless of the experience level of their drivers.

The risk is acute. A fully loaded mixer travelling at 30 mph on a cambered road presents a materially different hazard profile from an unladen articulated lorry. Drivers must understand load behaviour, drum speed management during transit, the effect of forces on a rotating drum and chassis, and the correct procedure for managing the load. Without formal, evidenced training on these specific matters, the employer is exposed.

### How RoadSURE Pro™ Addresses This

RoadSURE Pro™ delivers a practical, on-vehicle observed assessment covering pre-use checks, loading procedures, driving with a loaded drum, stability management, and emergency procedures. The detailed assessment report records strengths, identified gaps, and corrective actions agreed with the driver. The card and report together provide dated, verifiable proof of adequate training and assessment in a format accepted by HSE inspectors and courts.

### Practical Action

Issue every drum-mixer driver a current RoadSURE Pro™ card together with their full assessment report. Retain both documents in the driver's personnel file. Schedule refresher assessments before card expiry and record the scheduling decision in your training plan.

## Duty 2: Suitable & Sufficient Risk Assessment

### MANAGEMENT OF HEALTH AND SAFETY AT WORK REGULATIONS 1999 – REGULATION 3

**The Legal Duty:** Every employer shall make a suitable and sufficient assessment of the risks to the health and safety of his employees to which they are exposed whilst at work.

A risk assessment is not suitable and sufficient unless it is vehicle-specific and site-specific. A generic workplace transport risk assessment that addresses all vehicles types in a single document will not satisfy this regulation for drum mixer operations. The assessment must address fully-loaded stability, the effects of drum rotation on centre of gravity, site manoeuvring risks, interaction with other site vehicles and pedestrians, and the specific hazards associated with the discharge process.

HSE inspectors examining a serious incident involving a mixer vehicle will ask to see your risk assessment as their first step. If it does not reflect the specific hazards of loaded drum operation – and cannot be linked to evidenced driver training addressing those hazards – enforcement action, prohibition notices, or prosecution become likely outcomes.

#### How RoadSURE Pro™ Addresses This

The RoadSURE Pro™ competence assessment explicitly tests drum-specific risks: load behaviour during transit, stationary drum management, reversing under loaded conditions, and stability during site manoeuvres.

Critically, the report's *"Areas for Improvement"* section provides a direct, evidence-based input to your workplace transport risk assessment. When you update your risk assessment following an assessment cycle, you can demonstrate that it has been informed by observed, on-vehicle evidence rather than attendance only DCPC course.

This creates a feedback loop between driver competence and risk management that satisfies the *"suitable and sufficient"* test – and demonstrates best practice. The report also records driver-specific issues such as speed management, mirror use, and load security checks, all of which should be reflected in your site-specific risk assessment documents.

#### Practical Action

Use the RoadSURE Pro™ report as living evidence when reviewing or updating your workplace transport risk assessments. File the report alongside the risk assessment it informs.

## Duty 3: Periodic Refresher Training

### MANAGEMENT OF HEALTH AND SAFETY AT WORK REGULATIONS 1999 – REGULATION 9

**The Legal Duty:** Every employer shall ensure that employees are provided with adequate health and safety training on their being recruited, on their being exposed to new or increased risks, and that training is repeated periodically where appropriate, is adapted to take account of new or changed risks, and takes place during working hours.

Regulation 9 establishes that training is not a one-time event. For high-risk vehicles such as drum mixers, periodic reassessment is not merely good practice – it is a legal requirement.

The Senior Traffic Commissioner's Statutory Document No. 3 reinforces this by demanding "*continuous and effective management*" of driver competence as a condition of O-licence compliance. Operators whose drivers hold current DCPC cards but cannot evidence periodic vehicle-specific reassessment are failing this duty.

Driver behaviour drifts over time. Standards that were demonstrated at initial assessment may deteriorate through familiarity, time pressure, or changes in working practice. The only way to demonstrate that your drivers remain competent – not merely qualified – is through periodic, documented reassessment against a consistent, vehicle-specific standard.

### How RoadSURE Pro™ Addresses This

- **Clear Expiry Date:** The RoadSURE Pro™ card carries a clear expiry date, creating an unambiguous, diary-able deadline for refresher assessment and qualification.
- **Adaptive Assessment:** The report format records previous incidents and policy reinforcements, demonstrating that training adapts to emerging risks as Reg. 9 requires.
- **Driver Acknowledgement:** The report records the driver's acceptance of feedback, providing evidence that periodic training has been communicated, understood, and acknowledged.

### Practical Action

Diary refresher assessments before card expiry. Retain all assessment reports in driver files to demonstrate a continuous, progressive training history.

## Duty 4: Mobile Work Equipment & Stability

### PROVISION AND USE OF WORK EQUIPMENT REGULATIONS 1998

**The Legal Duty:** PUWER Regulations apply specifically to drum mixers as mobile work equipment. Employers must ensure work equipment is suitable (Reg 4), that users receive adequate information and instructions (Reg 8) and training (Reg 9), and that mobile work equipment is stable and operators are trained to prevent overturning (Regs 25–30).

A drum mixer is not simply a road vehicle – it is a piece of mobile work equipment with an integrated mixing system. PUWER applies to the complete assembly.

Driver and Vehicle Standards Agency (DVSA) identifies drum mixers as a known, documented rollover risk category. The regulations require employers to go beyond vehicle licensing and DCPC requirements to demonstrate equipment-specific operator competence.

During an incident investigation, regulators will expect to see documented evidence that operators have been assessed on the specific stability characteristics of the equipment they are operating – not just that they hold a driving licence.

### How RoadSURE Pro™ Addresses This

The RoadSURE Pro™ card explicitly states on its reverse that the qualification demonstrates PUWER compliance for the vehicle type and attached equipment. This is a deliberate design feature – the card is structured as a PUWER compliance document as well as a driver competence certificate.

Assessments include stability awareness when fully loaded: approach angles, speed management on cambered surfaces, drum speed during transit, and the correct procedure for dealing with an overloaded or incorrectly loaded drum. These elements directly correspond to the requirements of PUWER.

When an HSE inspector or internal auditor asks for evidence of PUWER compliance for your drum mixer fleet, the RoadSURE Pro™ card and assessment report provide a single, coherent document set that answers the question definitively. No other scheme currently available in the UK is designed with this explicit PUWER alignment.

### Practical Action

Present the RoadSURE Pro™ certificate and assessment report during incident investigations, transport audits, and insurance reviews. File them in your work equipment register alongside your mixer maintenance records.

## Duty 5: Load Security & Safe Loading

### ROAD TRAFFIC ACT 1988 & ROAD VEHICLES (CONSTRUCTION AND USE) REGULATIONS 1986 — REGULATION 100

**The Legal Duty:** No person shall use, or cause or permit to be used, on a road a motor vehicle or trailer when the load carried is in such a position, or is secured or retained in such a manner, that danger is caused or is likely to be caused to any person. The load must be secured so that it cannot fall from the vehicle or shift in a manner likely to cause danger.

This is a strict liability offence. There is no defence of reasonable practicability — if the load causes or is likely to cause danger, the offence is committed.

For drum mixer operators, the implications are significant. Wet concrete is not a fixed load. Its behaviour changes with drum speed, transit duration, road gradient, and slump.

A driver who does not understand these dynamics — and who cannot demonstrate that they have been trained to manage them — creates direct criminal liability for both themselves and their employer.

The duty extends beyond the driver to the employer who *"causes or permits"* the use of the vehicle. An employer who cannot produce evidence that drivers have been trained in drum-specific load management is exposed to prosecution, regulatory action, and significant civil liability in the event of an incident involving load instability or spillage.

### How RoadSURE Pro™ Addresses This

- **Visual Load Inspection:** Assessment includes visual inspection of the load level and consistency before departure, confirming the driver can identify overloading or excessive slump.
- **Drum Speed Setting:** Correct drum speed for transit conditions is assessed and documented, demonstrating understanding of load behaviour management.
- **Load Security Checks:** Pre-delivery checks are formally assessed and recorded in the competence report.
- **Competence Confirmation:** The assessment report explicitly confirms competence in load security procedures, providing evidence against the strict liability standard.

### Practical Action

Incorporate the RoadSURE Pro™ load-security assessment elements directly into your daily vehicle-check procedures and driver briefing documentation.

## Duty 6: O-Licence Compliance & STC Standards

### GOODS VEHICLES (LICENSING OF OPERATORS) ACT 1995 & STC STATUTORY DOCUMENTS

**The Legal Duty:** Drum mixers require an Operator's Licence (O-licence). Under the Goods Vehicles (Licensing of Operators) Act 1995, operators must at all times demonstrate that they are of good repute, have appropriate financial standing, and – critically – demonstrate continuous and effective management of drivers and vehicles.

The Senior Traffic Commissioner's Statutory Documents No. 0 and No. 3 set out in precise terms what "*continuous and effective management*" means in practice. It requires verifiable, dated, vehicle-specific competence records that can be produced at public inquiry, transport audit, or DVSA encounter.

A transport manager who appears before a Traffic Commissioner without evidenced driver competence records for specialist vehicles faces a very serious risk of licence curtailment, suspension, or revocation – regardless of the size or standing of the operator.

The consequences of O-licence action extend far beyond the individual incident. A licence curtailment affects the entire fleet. A revocation can end a business. Traffic Commissioners have made clear in previous public inquiry decisions that they expect operators of specialist vehicles to go beyond the minimum DCPC requirement and demonstrate vehicle-specific training systems.

RoadSURE Pro™ was designed from the outset with Traffic Commissioner requirements in mind. The scheme's structure, documentation format, and assessment methodology align directly with DVSA and STC standards. Cards and reports can be accepted as evidence at public inquiries and in audits conducted by DVSA.

### How RoadSURE Pro™ Addresses This

- **Auditable Evidence:** Card and report provide dated, signed, verifiable competence evidence.
- **DVSA Aligned:** Scheme structure meets DVSA and Senior Traffic Commissioner standards for vehicle-specific competence.
- **O-Licence File Ready:** Records link directly to your O-licence compliance file and transport manager audit schedule.
- **Public Inquiry:** Can be used as evidence at Traffic Commissioner public inquiries and DVSA encounters.

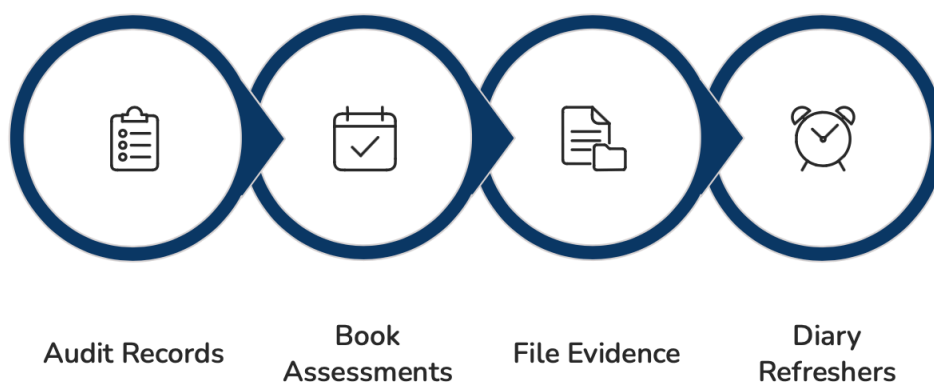
### Practical Action

Link RoadSURE Pro™ records to your O-licence compliance file. Include them in your TM audit schedule and make them available at any DVSA interaction or public inquiry.

## Taking Action: Your Next Steps

Compliance with these six legal duties is not a theoretical exercise. Each duty requires dated, verifiable, vehicle-specific evidence – and each exposes the employer to enforcement action, prosecution, or O-licence jeopardy if that evidence cannot be produced.

The good news is that RoadSURE Pro™ provides a single, coherent evidence system that addresses all six simultaneously.



Begin with a systematic audit of your current driver records. Identify every driver who operates or may be called upon to operate a drum-type mixer vehicle, and confirm whether they hold a current, unexpired RoadSURE Pro™ card. Any gap is a compliance gap – and a liability gap.

RoadSURE Pro™ is administered by STL Awards, the originating body and custodians of the scheme.

RoadSURE Pro™ records are designed to integrate with standard transport management and compliance systems. Assessment reports are structured documents that can be linked to driver records, risk assessments, and O-licence compliance files without modification.

RoadSURE Pro™ is the only scheme in the UK market specifically designed to provide auditable, practical evidence against all six major legal duties governing drum mixer driver competence. It replaces the withdrawn EMPI SVCA and is recognised as best-practice evidence of employer compliance and employee competence.



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