



GUIDANCE ON COVID-19 AND THE MOVEMENT OF VEHICLES

ISSUE

The present restrictions as a result of Coronavirus / COVID-19 have led to some uncertainty about the types of activity that remain permissible. This guidance, which reflects Government advice as at 9th April 2020, is intended to clarify the requirements that apply on vehicle and parts collections, delivery and distribution.

VEHICLE AND PARTS COLLECTIONS AND DISTRIBUTION - REQUIREMENTS

Business and venue closures

On 23rd March 2020 the Government stepped up measures to prevent the spread of coronavirus. As part of these measures it required specified businesses and venues to close, as they involve prolonged close social contact which increases the chance of infection spreading. The specified businesses and venues are set out [here](#) and include all retail venues, subject to certain exceptions. The exceptions include car garages and MOT services, vehicle rental services and – importantly – storage and distribution facilities.

It follows therefore that **retail venues** (such as showrooms) that form part of vehicle dealerships and auction houses must close. But it also follows that **storage and distribution facilities** connected to vehicle dealerships and auction houses are not required to close.

This means that – subject to observing other Coronavirus / COVID-19 precautions (see below) – the collection, delivery and distribution of vehicles and parts, including from dealerships and auction houses, remains permitted, while the business of vehicle sales from showrooms and the carrying on of auctions are prohibited (except for on-line activities). Vehicles and parts may still be collected, delivered and distributed to and from customers and businesses, including in regard to the sale of vehicles and parts, especially so for key workers.

Coronavirus / COVID-19 precautions

While the collection, delivery and distribution of vehicles and parts remains permitted, this must be carried out in compliance with current Coronavirus / COVID-19 precautions. Travel for work purposes is permitted, but only where work cannot be carried out from home. Other than the businesses it has specified, the Government has not required any other businesses to close – indeed it has stated *it is important for business to carry on*.

In its [social distancing guidance](#), the Government says that employers and employees should discuss their working arrangements. It recognises that certain jobs require people to travel to, from and for their work – which clearly applies to the collection, delivery and distribution of vehicles and parts. The Government says that,

if you cannot work from home, you can still travel for work purposes, provided you are not showing coronavirus symptoms and neither you nor any of your household are self-isolating. This is consistent with advice from the Chief Medical Officer.

In this situation, the Government says that employers should ensure that employees are able to follow Public Health England [guidelines](#) including, where possible, maintaining a two metre distance from others, and washing their hands with soap and water often for at least 20 seconds (or using hand sanitiser gel if soap and water is not available).

VEHICLE AND PARTS COLLECTION, DELIVERY AND DISTRIBUTION – BEST PRACTICE

Consistent with Government guidelines, on vehicle and parts delivery and collection, it is recommended that businesses and their agents:

- take a risk-based approach based on the level of human contact associated with the type of collection or delivery, and
- seek the use of alternative vehicle storage arrangements where possible.

The following recommends specific guidance businesses and agents should consider in vehicle and parts collection, distribution and delivery.

1. Set a clear policy on social distancing and staff protection measures

Businesses should implement and communicate a clear policy which sets out rules designed to protect their staff when collecting or delivering vehicles and parts. This should include:

- Doorstep social distancing – keeping at least two metres away from members of the public. Staff should be advised how this can be adhered to if the customer is required to sign to confirm the vehicle or parts have been collected or delivered.
- Any required use of protective clothing, such as gloves.
- Ensuring that there has been communication with the customer prior to the vehicle or parts being collected or delivered advising of how the agent will conduct themselves in a way that presents no risk, and understanding whether or not the customer has self-isolated because they have coronavirus symptoms. For example:
 - The agent will call the customer to advise they have arrived rather than approach the door.
 - Both the customer and the agent will be required to hand wash / sanitise.
 - The agent will expect the customer to place the keys and all paperwork in the vehicle (preferably in an envelope) only when the agent has arrived.
 - The customer should not be asked to sign anything, but it might be possible for an agent to record (on body worn cameras or a telephone)

the consent of the customer to take the vehicle or to acknowledge any damage.

2. Check insurance cover

Agents are often required to transport and drive vehicles that are owned by other businesses. This requires the agent to hold a special type of insurance to cover this type of activity. As COVID-19 presents a significant health risk to agents, the cover they have might not be satisfactory in the current circumstances. Businesses and agents should check that if activity continues throughout the crisis that the insurance policy remains sufficient. The Association of British Insurers provides guidance [here](#).

3. Prior communication between business and agent

Businesses should provide as much detailed information about each case as they can to ensure agents are aware of the risk. This should outline any reasons why there would be an increased risk of customer contact. Agents should not undertake any collections or deliveries without first risk assessing each case.

4. Risk assessment

There are numerous reasons why an agent would be appointed to collect or deliver a vehicle or parts. Each type of collection or delivery comes with varying levels of customer and public engagement depending on the type of collection or delivery and the geographical location and setting where the vehicle or parts are being collected from or delivered to. The following factors should be considered.

(i) Collection and delivery types

Businesses and agents should consider risk assessing each case which can be broadly grouped into hostile and consensual collections and deliveries:

- Consensual collections and deliveries present a **lower risk** because the customer is prepared to co-operate and/or the customer may not be present when the vehicle or parts are collected or delivered:
 - **Voluntary terminations (VTs) and surrenders** - are instigated by the customer's choice to terminate a lease or finance agreement. Terminations are likely to increase over the crisis period because customers are isolating at home and may feel they can manage without a vehicle at this time.
 - **Pound collections** – police pounds usually come with heavy security which provides separation between collecting agents and police staff. Furthermore, these vehicles are more at risk since no action will lead to them being disposed of.
 - **Abandoned vehicles on public land** – will usually be collected without any contact with the customer. These vehicles are at risk of seizure or damage.
 - **Agreed collections and deliveries** – for example, where the customer may have come to the end of a lease or finance agreement and is handing back the vehicle, a vehicle or parts are being delivered, or for any other reason where the collection or delivery is consensual.

- Hostile collections pose a **higher risk** because they may lead to the customer or person in possession of the vehicle showing some resistance to allowing the vehicle to be recovered. This could result in close contact with the customer or third party:
 - **Default termination** – where the customer has shown no engagement and the business has obtained a court order to repossess at the known location of the vehicle. The risk may be reduced here if the customer does provide consent to collection post receipt of the court order.
 - **Fraud recovery** – where the agent identifies the location of the vehicle which is in the possession of a fraudulent third party. The risk of not proceeding here must be balanced carefully with the risk of the vehicle disappearing over the lock-down period.

(ii) Geographical location and setting

The area the vehicle or parts are being collected from or delivered to should be risk assessed in advance. Where locations have high population density, and reduced access to the vehicle, parts or customer, the risk of the agent coming into close proximity with other members of the public increases.

(iii) Vehicle storage

Although auction houses are closed for auctioneering retail activities, many are able to securely store vehicles that have been collected or repossessed. Vehicle collection agents also typically have storage solutions in place where they are needed. Specific venues intended for storage should be risk assessed against the Government's social distancing guidelines.

**BRITISH VEHICLE RENTAL & LEASING ASSOCIATION
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