

The transportation of caravans or motorhomes for commercial purposes

Where a dealership has a legitimate commercial reason to move units - touring caravans or motorhomes - across the UK road network from one of their business premises to another, such as from a showroom to a workshop, and the destination is located within a locally 'locked down' area then under the current travel restrictions we understand such a movement to be an acceptable commercial activity.

This would include a situation where a caravan or motorhome needs to be delivered to a customer from a workshop or showroom in order for the business to free up sufficient space to continue normal commercial operations.

We would not recommend the 'mass movement' of vehicles into locked down areas but if you have a small number that require transportation for a legitimate, commercial purpose e.g. for repair prior to export, or delivery to a customer then we would suggest the following process to ensure that your staff are in a position to evidence the activity should they be stopped by the police:

1. Managing the journey

- Where possible use a branded company vehicle to tow the caravan between premises so that it is clear that the journey is for commercial purposes rather than personal. Where the towing vehicle and caravan combination weight exceed 3,500kg then the branded vehicle must be fitted with a tachograph as it is being used commercially.
- If you do not have a branded vehicle with a tachograph fitted, then the tow vehicle must be identifiable as a company vehicle by carrying copies of the appropriate documentation such as the V5 and insurance document.
- Your driver should be able to evidence:
 - details of the caravan / motorhome (VIN if unregistered)
 - the date and start time of the journey
 - the address of the premises where the journey starts and ends
 - the ownership of any business premises involved in the transportation - if delivery is to a business location that is not owned by your company then you must ensure that the driver carries written permission signed by a named director of the other company.

2. Documentation

- Ensure that the driver has the appropriate paperwork to hand to evidence the purpose of his journey including, but not necessarily limited to:
 - Name of driver and evidence that they are either employed, or have been commissioned, by your company to undertake the delivery. This confirmation should be on headed paper and signed by a member of senior management with contact details supplied for verification purposes
 - Evidence of the ownership of the caravan/motorhome and CRiS registration details where appropriate
 - The nature of the work to be done to the caravan /motorhome at the other address or the reason for the movement e.g. repair work, delivery to the owner
 - Evidence of the intended use for the caravan once repaired i.e. export if the movement is for business to business purposes
 - Copy of the risk assessment to be carried out at the end of the journey prior to handover – see para 6 below
- 3. Ensure that the driver has written copies of your company's protocols on:
 - social distancing and
 - hygiene (such as hand washing and disinfecting the vehicle on arrival)in their possession for the duration of the journey.
- 4. Ensure that the driver has the necessary equipment to abide by company protocols (such as hand sanitiser, antibacterial wipes, disposable gloves etc) with them in the vehicle for the duration of the journey.
- 5. In the case of a caravan ensure that:
 - a. the towing vehicle's registration is displayed on the caravan
 - b. it is fitted with the correct towing mirrors
 - c. there is a valid insurance policy in place to tow the caravan and
 - d. your driver holds the relevant driving licence to enable them to tow.

In the case of a motorhome trade plates must be displayed to the front and rear, in accordance with DVLA guidelines if appropriate.

- 6. Undertake a risk assessment around the handover of the caravan / motorhome on arrival including:
 - a. how staff and customers will be protected during the handover procedure
 - b. how surfaces will be cleaned and disinfected to ensure the safety of the recipient

- c. how a safe, socially distanced explanation of work undertaken or the operation of the unit will be undertaken when delivering to a customer

Provide the driver of the towing vehicle / motorhome with a written copy of this that can be produced if they are stopped by the police.

7. Ensure that your driver is aware that, should they be stopped by the police at any point, they need to explain and evidence that this is a commercial activity.

Our view is that if this process is followed the risk of the company falling foul of the localised lockdown restrictions should be significantly reduced.

Any decision to carry out such movements must be a business operational decision based on the information available and in line with current government, devolved administration and local lockdown provisions and restrictions.

DISCLAIMER: It must be noted that this is based on our interpretation of the information currently available. The purpose of the journey will need to be evaluated by each individual business and there is no guarantee, should your driver be stopped by the police during the course of a delivery, that they will be allowed to continue.