

Driver Licensing Review

Call for evidence on opportunities for changes to the driver licensing regime – summary report

February 2023

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Overview

Overview

In 2022, the UK Government launched a call for evidence about potential changes to the driver licensing regime. The call for evidence review opened on 5 August and ran for 12 weeks, closing on 28 October.

It focused on four areas:

1. To grant drivers who have a car (category B) licence entitlement additional entitlement to a HGV (category C1) licence.
2. To grant drivers who have a car (category B) licence entitlement to a minibus (category D1) licence.
3. To create a formalised instructor programme or training and how this could be made compulsory, to create a formal register of instructors and to publish pass rates for instructors.
4. Other minor driving licence changes.

The call for evidence includes seeking evidence on the economic benefits of widening the recruitment pool for medium-sized goods vehicles and minibus drivers, which may attract more people to the industry and support economic growth by further strengthening the supply chain.

This report provides a summary of the responses received. It covers the four areas above and includes verbatim comments and evidence received from those responding as individuals and those responding on behalf of a range of organisations, including schools, local authorities and community transport organisations.

02

Introduction and background to the review

Introduction and background to the review

During the coronavirus pandemic and the subsequent HGV driver shortage crisis, the UK government rapidly put 33 actions in place to address the challenges. Eight actions related to the expansion of HGV driver testing capacity and improving the licensing process. The licensing improvements were achievable partly due to the fact that the UK had left the European Union and as such had the freedom to change legislation to improve the testing and licensing regime.

In 2022 the UK government wished to explore whether there would be any further opportunities that could be available and launched a call for evidence on 5 August. The call for evidence included seeking evidence on the economic benefits of widening the recruitment pool for medium-sized goods vehicles and minibus drivers, which may attract more people to the industry and support economic growth by further strengthening the supply chain. The call for evidence closed at 23:45 on 28 October.

Those who wished to provide evidence were asked to submit this online as part of an online survey. The survey was designed by the Department for Transport (DfT) and included 88 questions. Overall, 2,061 responses were received, including 1,742 responses from individuals and 319 from those representing organisations. As part of the call for evidence, a small number of the 2,061 responses submitted to DfT were done so offline (by post and email). These were anonymised by DfT before being securely transferred to Ipsos for analysis.

Summary of the questions asked

DfT designed a survey questionnaire consisting of 88 questions, with Ipsos commissioned to analyse responses and prepare a summary reporting of the findings. Those responding to the review were not required to answer all of the questions, but only those they saw as relevant and dependent on whether they were responding as an individual or on behalf of an organisation.

The questions covered:

- Background questions, including whether those responding to the call for evidence were doing so as individuals, or on behalf of organisations. Those responding on behalf of organisations were asked to indicate the type of organisation they were responding on behalf of (including schools, local authorities, or transport organisations).
- Whether respondents (and employees of organisations) hold C1 driving licences and Category L entitlement. C1 permits the licence holder to drive vehicles between 3,500 and 7,500kg (with a trailer up to 750kg). Category L covers electrically propelled vehicles such as milk floats.
- Since 1 January 1997 (due to the EU Second Driving Licence Directive), a separate test has been required to obtain C1 entitlement. However, the call for evidence wished to consider a proposal to allow most, if not all, car drivers to operate vehicles up to 8.25 tonnes and benefits and drawbacks of this.

Summary of the questions asked (continued)

- Exemptions:
 - Whether consultees think there are specific purposes of driving of C1 vehicles that should be exempted from Driver Certificate of Professional Competence (DCPC)* for driving in the UK.
 - If there are specific purposes of driving of C1 vehicles that should be exempted from DCPC for driving in the UK.
- Removal of D1 licence requirement, including if consultees would support the removal of the requirement to obtain a D1 licence test to drive a minibus, impact of the proposal if implemented and concerns raised from those who do not support this proposal.
- Views on the possible introduction of a standardised training and qualification for HGV trainers. Whether it should be voluntary or mandatory for those who agreed with the proposal and whether there should be a mandatory register of HGV instructors managed by the Driver and Vehicle Standards Agency.
- Other licensing changes, including potential changes to legislation to bring agricultural vehicles within the Category C or CE regime.
- Data gathering on minibus services.

(*DCPC is a professional qualification required for drivers of lorries, buses, minibuses or coaches engaged in the commercial carriage of goods or passengers)

Profile of those who responded

The following table provides a breakdown of the number of responses received. Of 2,061 responses received, 1,742 were from individuals and 319 were from those representing organisations.

Response category	Number of responses
Overall total	2,061
Individuals	1,742
Organisations	319
School	23
Local authority	28
Transport organisation	25
Commercial transport organisation	32
Community transport organisation	93
Another type of organisation*	117
Unspecified	1

* Including charitable organisations, training organisations, driving schools and trade associations (self-defined)

03

Analysis methodology

Analysis methodology

Receipt and handling of responses

All responses submitted to the call for evidence were received directly by DfT. DfT removed personal and identifiable information from the responses (e.g. email addresses) before securely transferring the anonymised responses to Ipsos for analysis and reporting. The handling of responses at Ipsos was subject to a process of checking, logging and confirmation to ensure a full audit trail.

Analysis of responses

The online questionnaire included closed/tick-box questions and open/free-text questions. Closed questions were tabulated* and included in a set of computer tables alongside open question responses that were coded. The process of analysing the content of each open question (and offline) response was based on a system where unique summary 'codes' were applied to specific words or phrases contained in the text of the response. The application of these summary codes and sub-codes to the content of the responses allows systematic analysis of the data.

Ipsos developed an initial coding framework (i.e. a list of codes to be applied) based on the text of the first batch of responses received. This initial set of codes was created by drawing out the common themes and points raised. The initial coding framework was then updated throughout the analysis process to ensure that any newly-emerging themes were captured. Developing the coding framework in this way ensured that it would provide an accurate representation of what was said. A copy of the computer tables and finalised codeframe/topline are provided as separate documents.

Analysis methodology

Analysis of responses (continued)

Ipsos used a web-based system called *Ascribe* to manage the coding of all the text in the open question (and offline) responses. *Ascribe* is a system which has been successfully used on numerous large-scale consultation projects. Responses were uploaded into the *Ascribe* system, where members of the Ipsos coding team then worked systematically through the comments and applied a code to each relevant part(s) of them.

The *Ascribe* system allowed for detailed monitoring of coding progress and the organic development of the coding framework (i.e. the addition of new codes to new comments). A team of coders worked to review all of the responses as they were uploaded to the *Ascribe* system. The coding team were briefed on the scope of the consultation to aid their interpretation of the comments contained in the responses.

To ensure that no detail was lost*, coders were briefed to raise codes that reflected the exact sentiment of a response and these were then collapsed into a smaller number of key themes at the analysis stage to help with reporting. During the initial stages of the coding process, weekly meetings were held with the coding team to ensure a consistent approach in raising new codes and to ensure that all additional codes were appropriately and consistently assigned.

(*In some cases consultees were able to make comments relevant only to specific sections of the questionnaire. For example, some of those who did not run goods transport services by road made comments only relevant to those who run goods transport services. A decision was made by Ipsos to exclude some comments from the dataset if they were considered to be out of scope).

Interpretation of findings

A call for evidence is a valuable way to gather opinions about a topic, but there are a number of points to bear in mind when interpreting the responses received. While the call for evidence was open to anyone, participants were self-selecting and certain categories of people may have been more likely to contribute than others. This means that the responses can never be representative of all individuals and organisations in Great Britain, as would be the case with a representative sample survey.

Typically, with any call for evidence, review or consultation, there can be a tendency for responses to come from those more likely to consider themselves affected and more motivated to express their views.

It must be understood therefore that a summary report of findings can only aim to cover the various opinions of those who have chosen to respond. It can never measure the exact strength of particular views or concerns amongst all organisations and individuals in Great Britain, nor may the responses have fully explained the views of those responding on every relevant matter. It cannot, therefore, be taken as a comprehensive, representative statement of opinion. A call for evidence is not a referendum.

It is also important to note that the aim of the call for evidence is not to gauge the popularity of any issues or topics raised in the responses; rather it is a process for identifying new and relevant information that should be considered. All relevant issues are therefore considered equally, regardless of whether they are raised by a single consultee or a majority. While this report cannot cover every response/issue raised in detail, a separate topline/codeframe has been produced which includes all responses to tick-box questions and coded responses to open responses and offline responses (i.e. those sent by post or email).

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Summary of findings

C1 goods vehicle entitlement

Categories of licence held

Category C1 and Category L

Consultees were first asked if they had Category C1 and/or Category L on their driving licence.

A **C1 category** allows those who have this on their licence to drive vehicles between 3,500 and 7,500kg maximum authorised mass (MAM) (with a trailer up to 750kg). **Category L** is a former category of driving licence which allowed a holder to drive any electrically-propelled vehicle, with no size or weight restrictions. It only exists as a grandfather right for some drivers and for a few who took a test on a Category L vehicle.

Individuals

Three in ten (30%) individuals indicated that they have C1 on their driving licence. However, most (68%) do not hold a C1 driving licence. Fewer than one in five (18%) indicated that they have full Category L entitlement on their driving licence. As with answers about C1, most (57%) do not have Category L entitlement. A further one in four (25%) were unsure.

Organisations

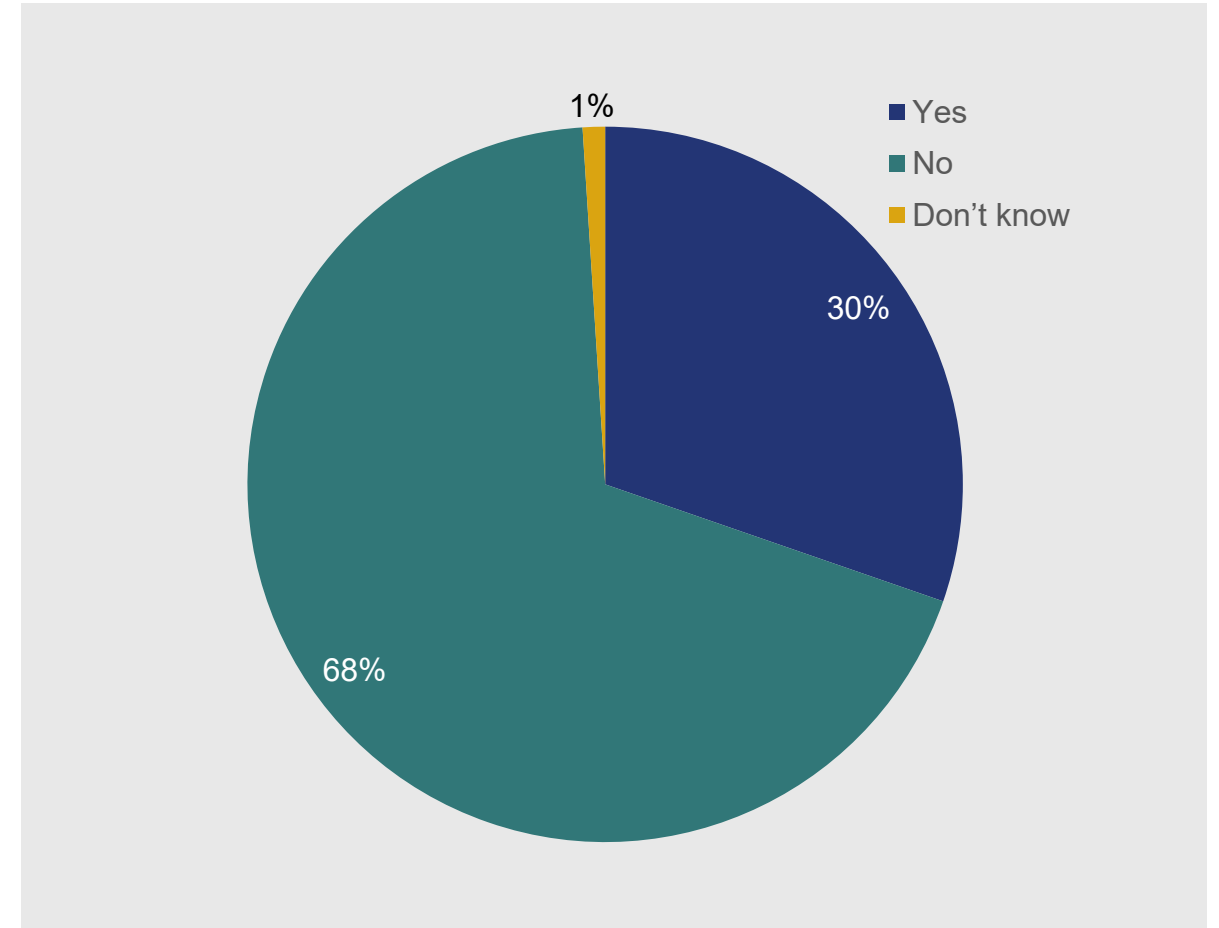
Around three-fifths of organisations (62%) indicated that one or more of their employees have C1, while one in four (25%) do not have this. A further one in seven (14%) were unsure. A fifth (19%) indicated that one or more employees have Category L entitlement, while for around one in three (36%) their employees do not have this entitlement. A sizeable minority (45%) were unsure.

Q2: Are you responding?



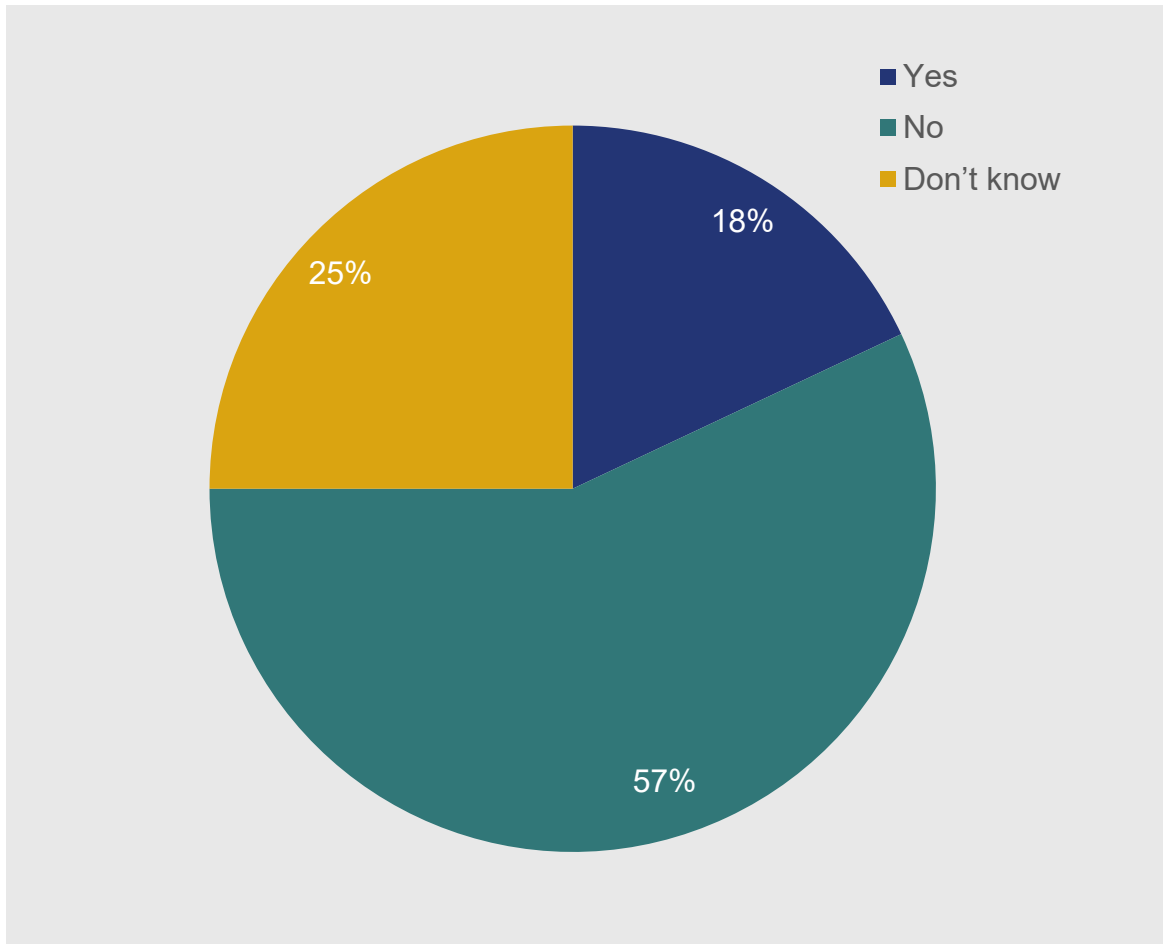
Base: All consultees who answered the question (2,061)

Q3: Do you hold a C1 driving licence?



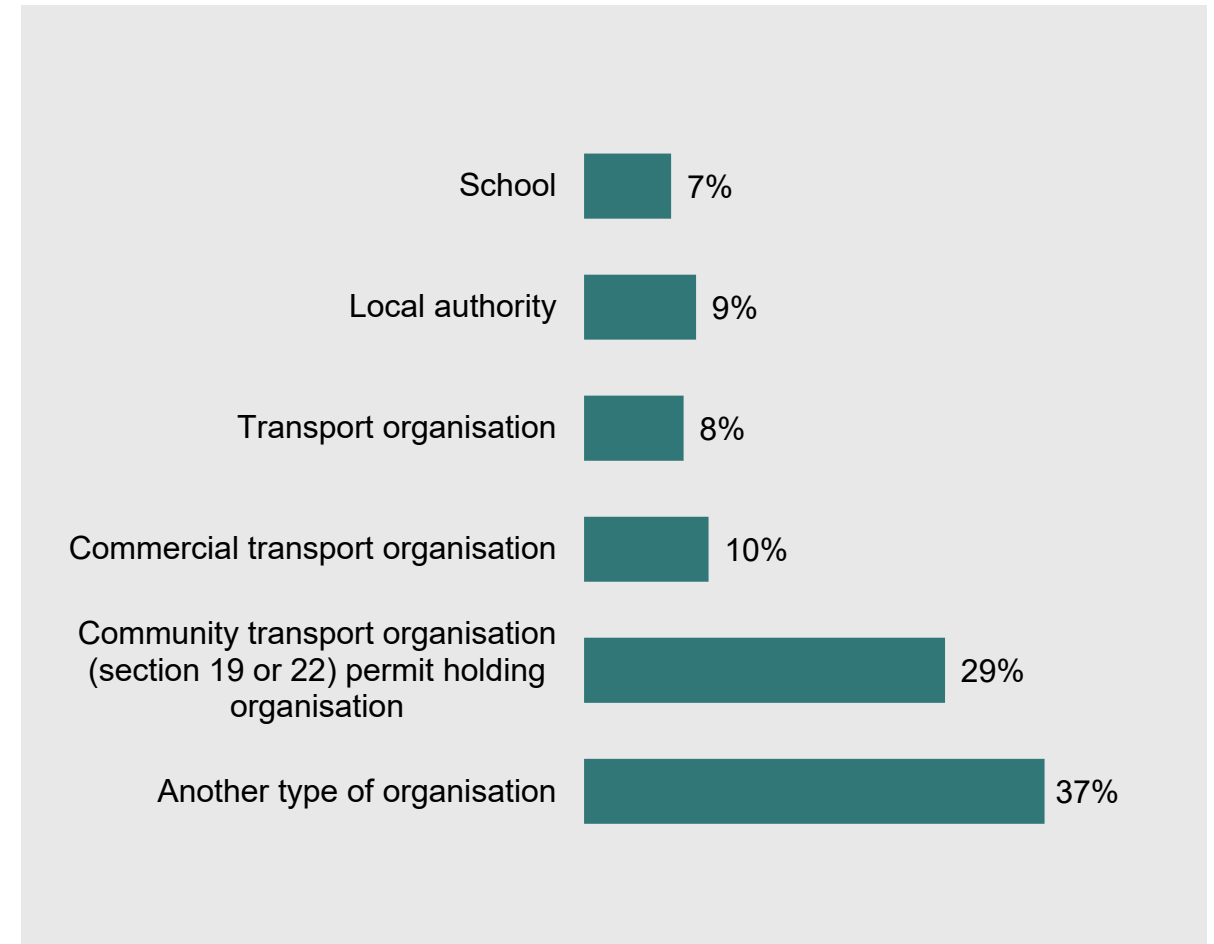
Base: Individuals who answered the question (1,737)

Q4: Have you got a full category L entitlement on your driving licence?



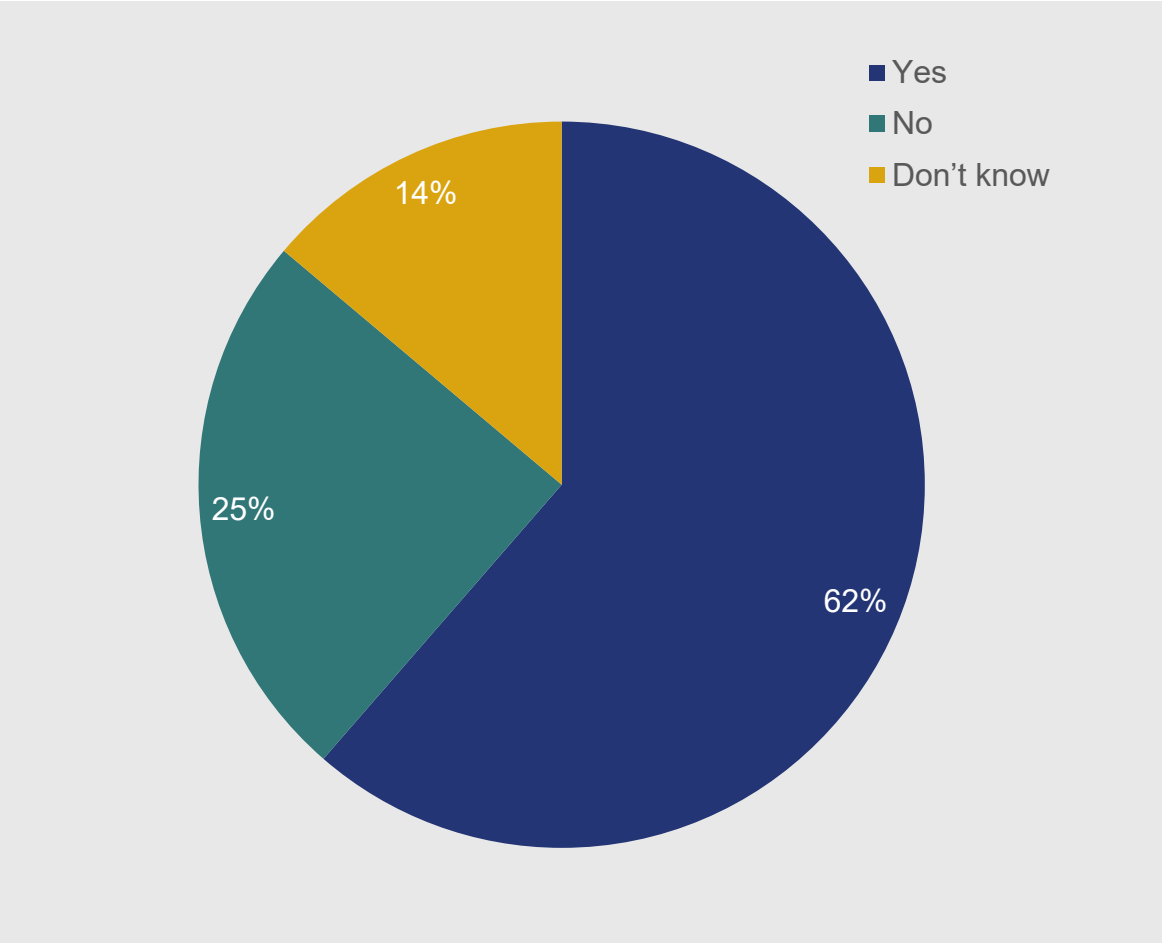
Base: Individuals who answered the question (1,732)

Q5: Your organisation is a:



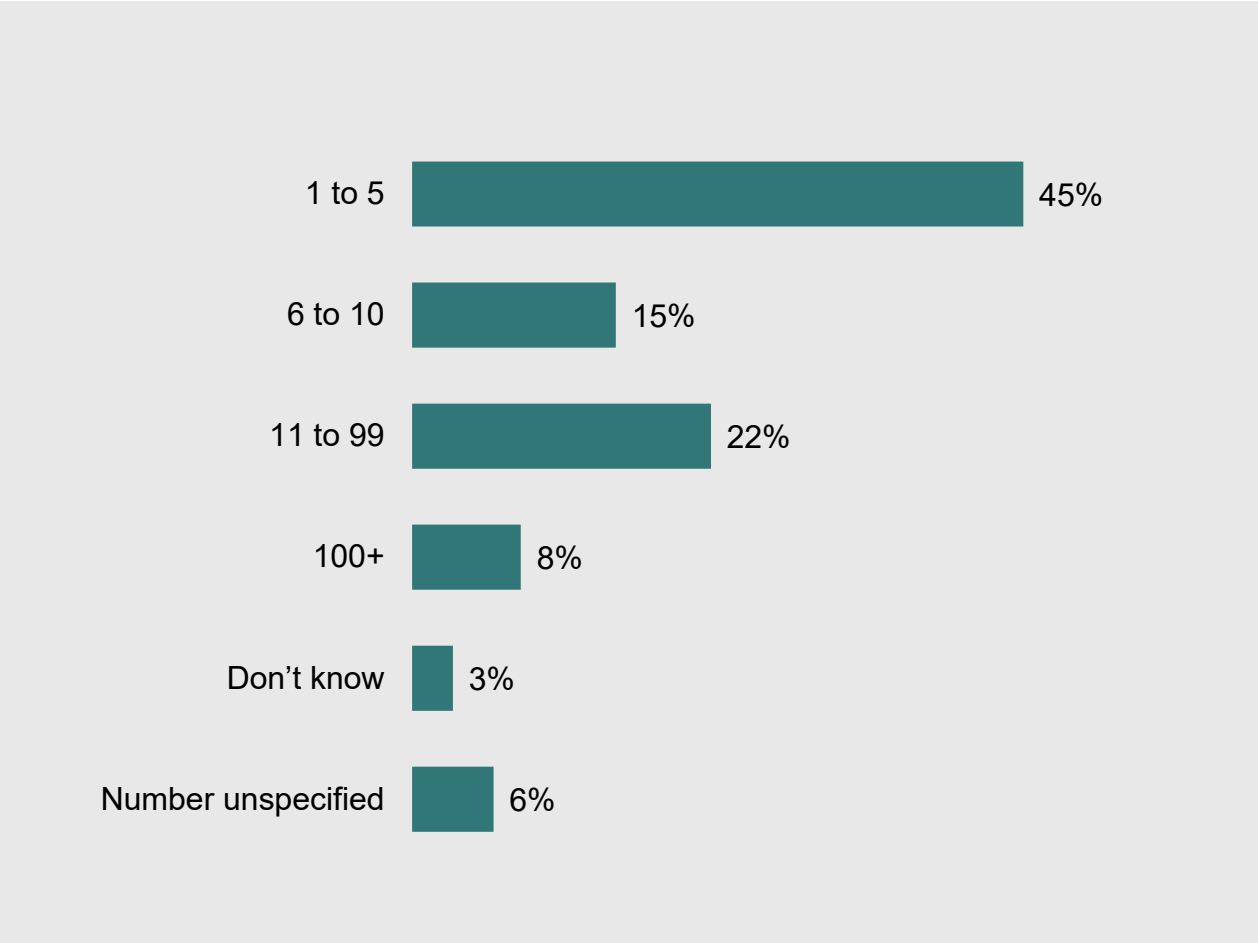
Base: Organisations who answered the question (318)

Q6: Do any of your employees hold a C1 driving licence?



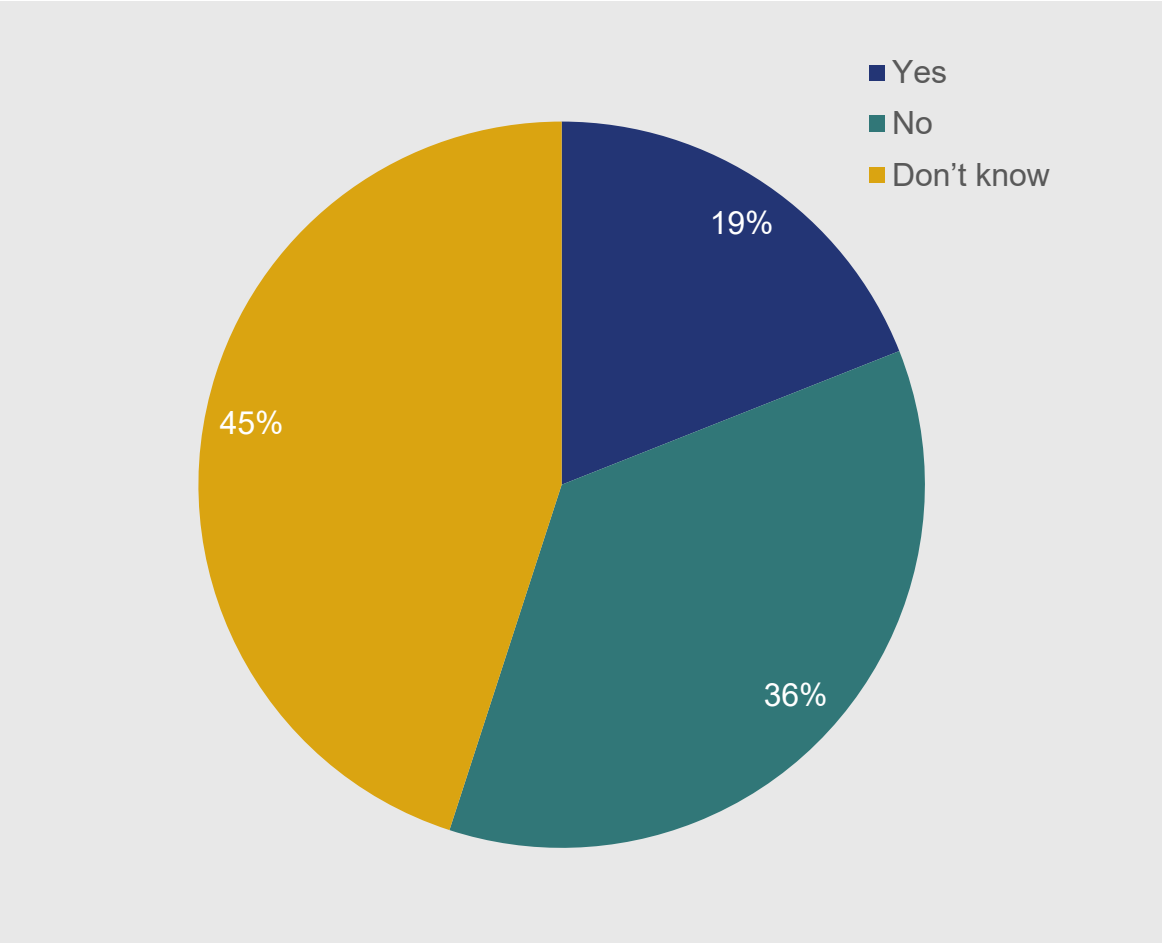
Base: Organisations who answered the question (310)

Q7: How many have C1 driving licences?



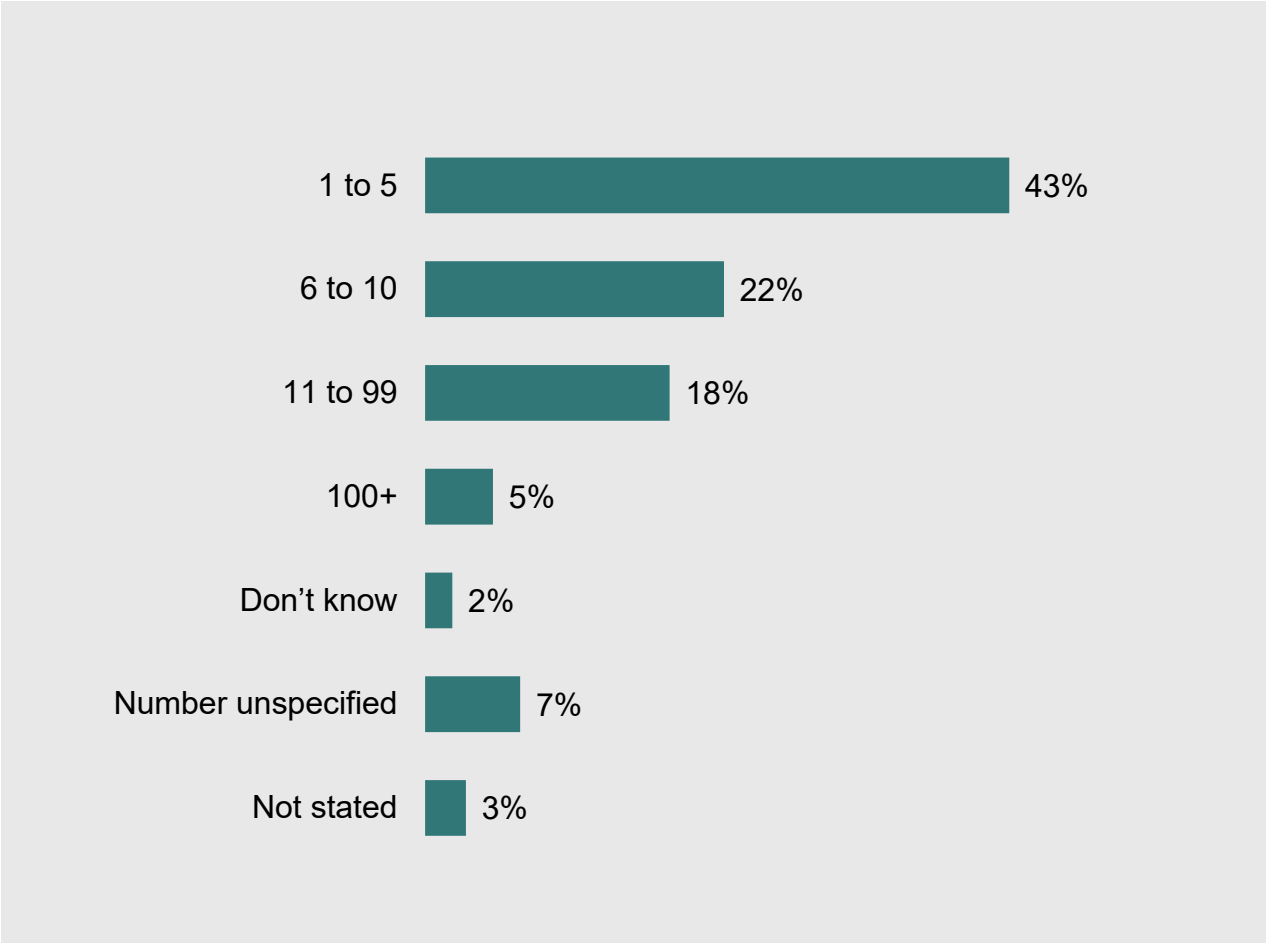
Base: Organisations with one or more employees who hold C1 driving licences (192)

Q8: Have any of your employees got full category L entitlement driving licences?



Base: Organisations who answered the question (314)

Q9: How many have L-category driving licences?



Base: Organisations with one or more employees who hold L-category driving licences (60*)

Road transport services

Road transport services

Potential saving and costs if the C1 proposal was implemented

Those who responded to the call for evidence were asked if they ran goods transport services by road. Around one in fourteen consultees (7%) said they did this. It included 51 organisations and 101 individuals. These consultees were asked a series of questions about savings, if any, that they could potentially make from the C1 licence proposal, as well as any additional costs that could arise if the proposal was implemented.

Most of those who provided comments (98 consultees) indicated that they could make savings as a result of the proposal. Some of those who made comments indicated a monetary figure. For example, there were 29 comments that savings could be between £1,000 and £4,999 and six comments that savings could be between £5,000 and £9,999. However, others who provided comments did not give a figure.

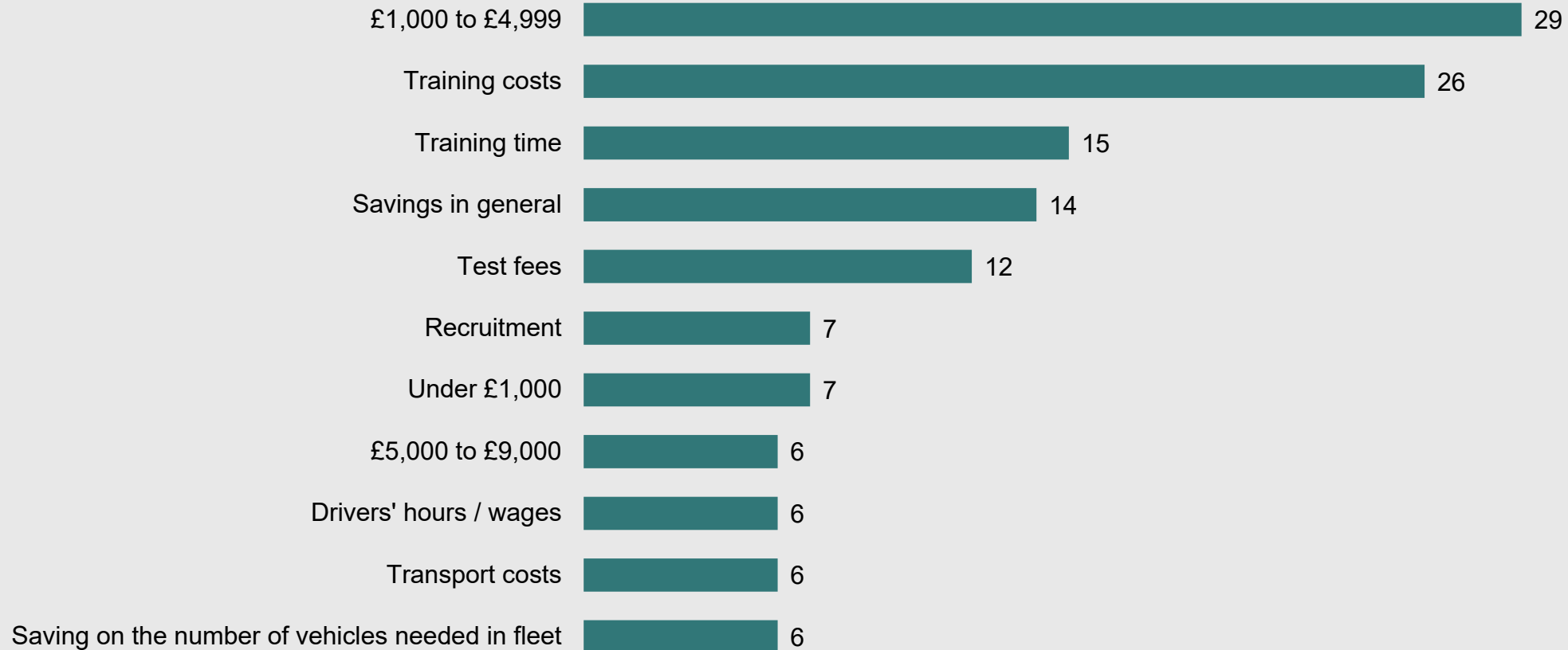
“As a small business we would save many thousands, plus it’s hard enough to find employees without then having to put them on C1 training too.”

There were 18 consultees who believed that there would be additional costs. Comments received about costs included that the proposal could increase insurance premiums (16 comments) and additional training costs (2 comments). There were also two comments that costs would increase in general and one comment that there could be additional CPC costs.

“Insurance costs would likely rise by allowing untrained and untested drivers to drive large vehicles. This has not been thought through in my opinion, you only have to look at the way “white van man” drives to know this. Also CPC training would need to be completed before anyone could drive.”

Savings that could be made from the C1 licence proposal - comments

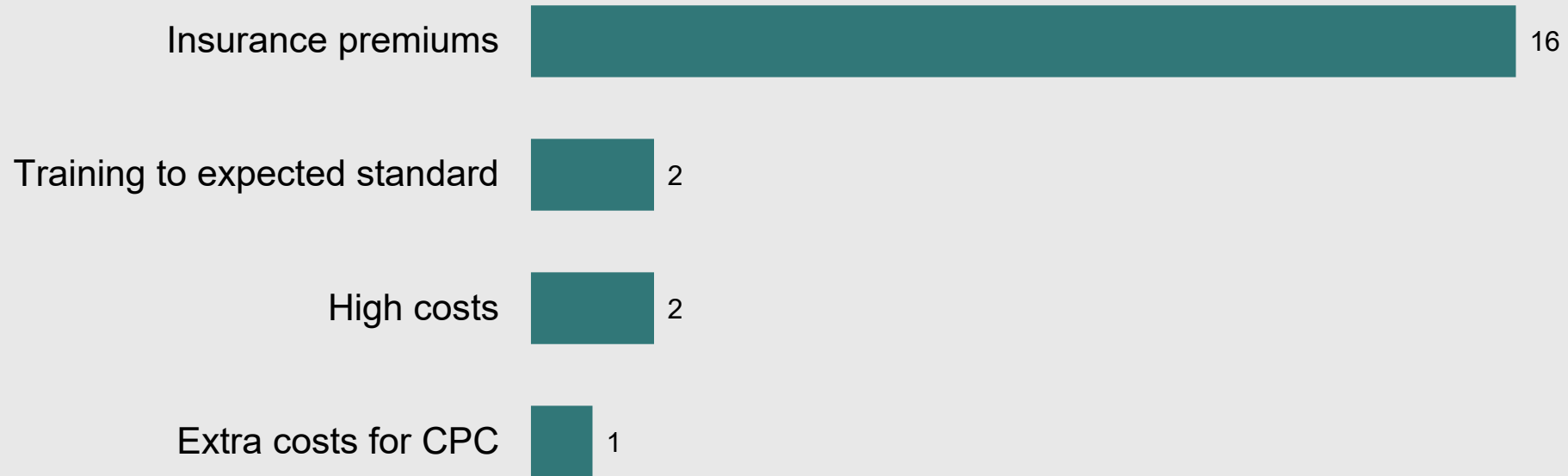
Potential savings if C1 proposal was implemented – most frequently made comments



Base: 98 consultees who run goods transport services by road

Costs that may arise from the C1 licence proposal - comments

Potential costs if C1 proposal was implemented – all comments made about costs



Base: 18 consultees who run goods transport services by road

Road transport services

Benefits / positive impacts of the C1 licence proposal

Those who run road transport services by road were asked to provide evidence of any benefits that could be realised from the C1 licence proposal, as well as positive or negative impacts, including upon road safety. In total, 114 consultees provided comments.

There were 97 consultees who made positive comments about the C1 licence proposal. The main comment received was that the proposal, if implemented, would help alleviate driver shortage (49 comments). Other comments included that there would be efficiencies as it would allow more single loads and/or bigger deliveries (25), that job opportunities would be created (23) and that there would be benefits with allowing more people to drive C1 vehicles in general (21).

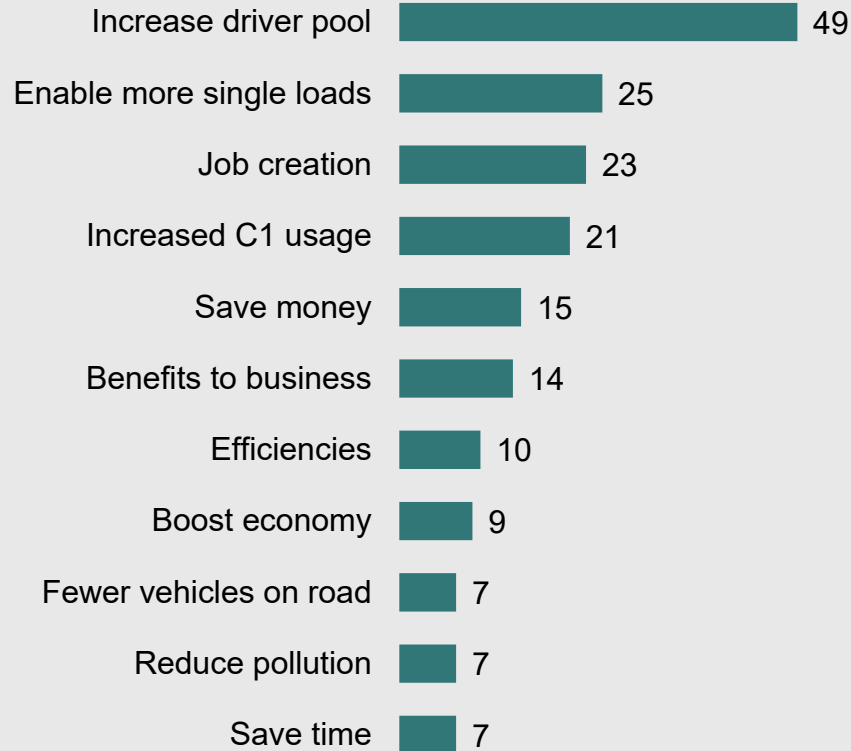
“It would be much more efficient to run a single trip in a 4,600kg van than to be restricted to multiple trips in a 3,500kg van.”

Nineteen consultees provided positive comments around road safety. The most frequently cited comments were that there would be improvements in general (8), less overloading of vehicles (4), that heavier vehicles would have lower speed limits (3) and that C1 vehicles are safer than in the past (3).

“As it would require fewer journeys to transport the goods, this would mean less vehicles on the road, less trips and therefore quieter roads. Hence improving road safety and reducing chances of road traffic collision.”

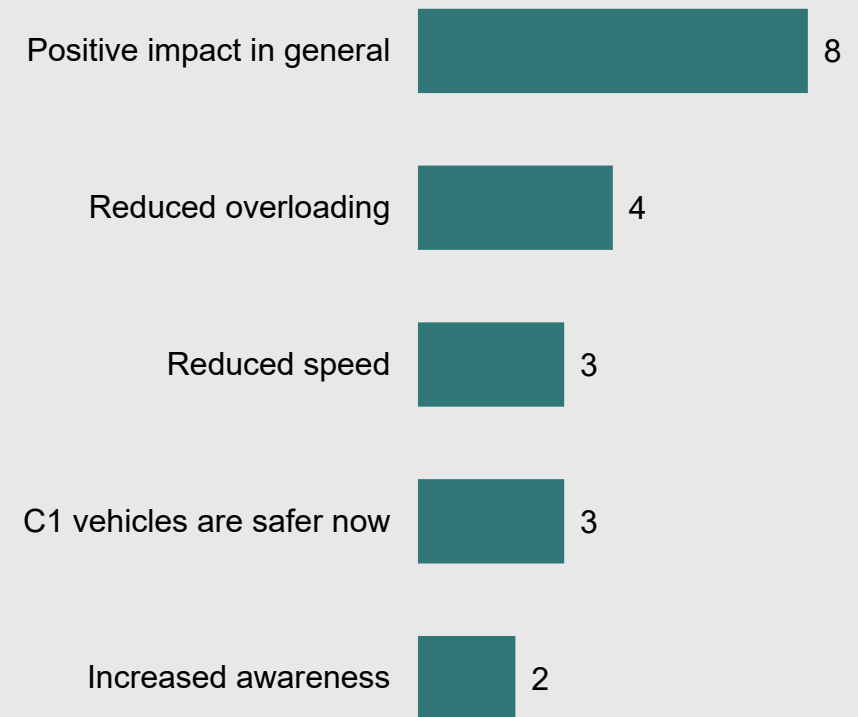
Benefits and positive impacts of the C1 licence proposal - comments

Benefits – most frequently made comments



Base: All who provided comments about benefits of the C1 licence proposal (95 consultees who run goods transport services by road)

Positive impacts on road safety – most frequently made comments



Base: All who provided positive comments about road safety as a consequence of the C1 licence proposal (19 consultees who run goods transport services by road)

Road transport services

Negative impacts of the C1 licence proposal

There were 33 consultees who provided negative comments about the impact of the C1 licence proposal. Most (30 consultees) who provided comments did so around road safety. There were 23 comments that there would be negative impacts due to lack of training and/or driving inexperience and 18 comments that accidents could increase.

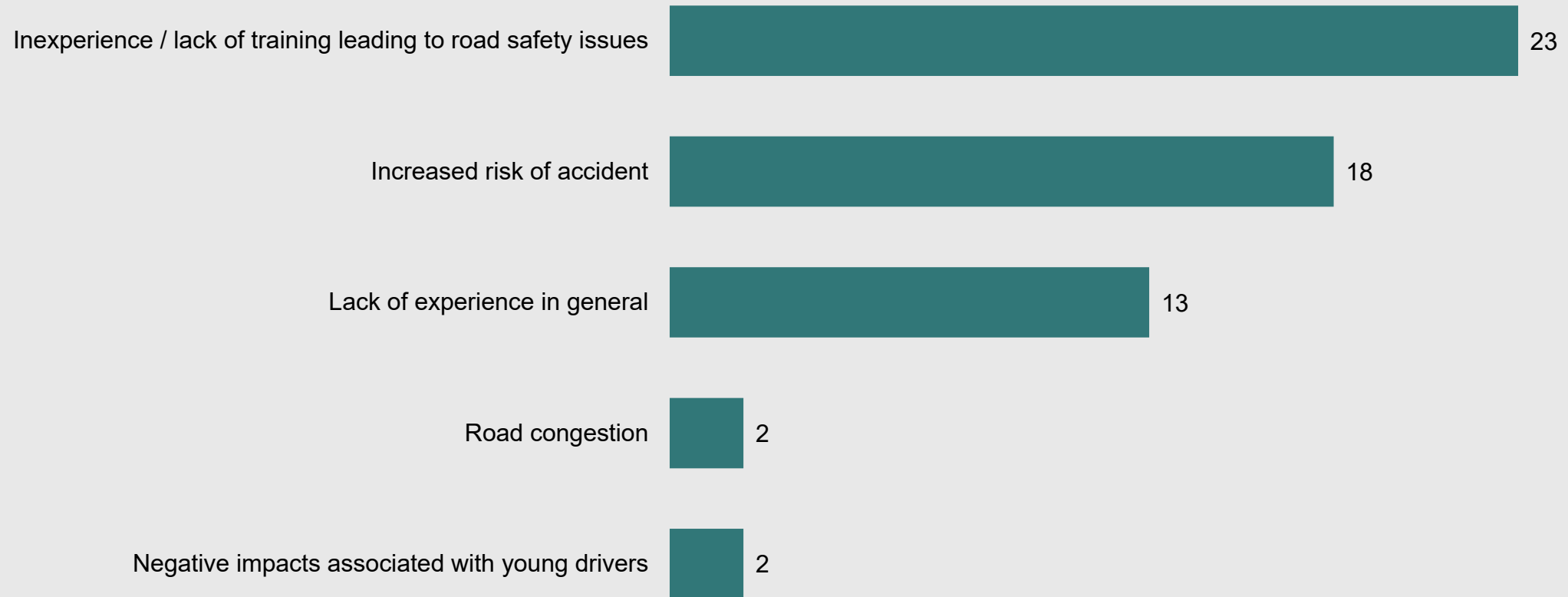
“Having worked in the large vehicle rental market the worst drivers were the 7.5 ton users, because the entitlement is on their licence they think it's like driving a car! It will have a negative impact upon road safety.”

Other less frequently made comments included that there could be negative impacts on businesses, that it would be unfair to those who had already paid to obtain a C1 licence and that it could reduce productivity.

“I think it is an insult to many a professional drivers and for all who hold a CPC. I have had to take a test, which had cost me hard earned money to pass...to let someone pass because they can drive a car is wrong.”

Negative impacts of the C1 licence proposal - comments

Negative impacts on road safety – most frequently made comments



Base: All who provided comments about negative impacts of the C1 licence proposal (33 consultees who run goods transport services by road)

Road transport services

Usage of C1 category vehicles if the C1 licence proposal came into force

Those who run goods transport services by road were asked if their use of C1 vehicles would increase, decrease or remain about the same as present if the C1 licence proposal was implemented. Of 145 consultees who answered the question, the majority (70%) indicated that their usage of C1 category vehicles would increase. Very few (just 3%) said that usage would decrease, while for around a quarter (26%), their usage would not change.

Consultees were asked to explain the reasons for their answer. There were 68 consultees who said that their usage of C1 category vehicles would increase and provided reasons for this. The main reasons given were that the proposal would allow more individuals and employees to drive C1 category vehicles (19 responses), that more drivers would be available (18 responses), that it would facilitate the carriage of larger/heavier loads (13 responses) and would bring benefits to business by creating new opportunities (13 responses).

“Because I'm finally allowed to do so without breaking the law...I could expand my business activities.”

There were just four consultees who provided reasons why they believed their usage of C1 category vehicles would decrease. Reasons given included that they would not keep existing vehicles and also that usage of larger vehicles would reduce the need for so many smaller vehicles.

In total, 21 consultees said their usage would remain the same with a main reason given was that drivers already had C1 on their driving licence.

Road transport services

Amount of C1 category vehicles if the C1 licence proposal came into force

Those who run goods transport services by road were also asked if the amount of C1 category vehicles in their fleet would increase, decrease, or stay the same as present if the C1 licence proposal came into force. Of 135 consultees who answered the question, just over three-fifths (63%) indicated that their usage would increase. Very few (3%) indicated that the amount of C1 category vehicles would decrease. For around one-third (34%), the amount of C1 vehicles in their fleet would remain about the same as present

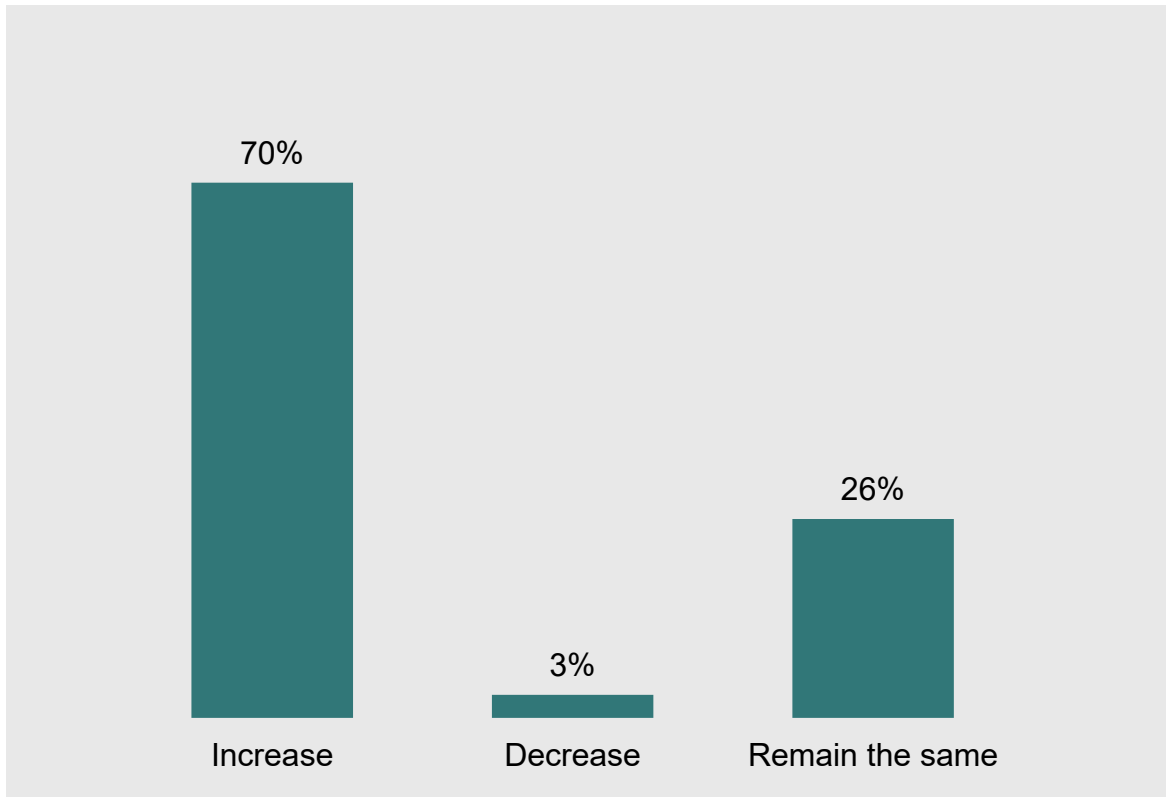
There were 45 consultees who provided reasons as to why the amount of C1 category vehicles in their fleet would increase. The main reasons given for this were that it would allow the purchase of more C1 category vehicles (23 responses), that more drivers would be available (11) and that it would allow more people, including employees to drive C1 category vehicles (6).

“We have a business need for this type of vehicle but struggle to find staff with the right qualification on their licence. Employing the right staff will mean we can invest in the right size vehicle...”

Just three consultees gave reasons as to why the amount of C1 category vehicles in their fleet would decrease with a reason given that fewer smaller vehicles would not be needed.

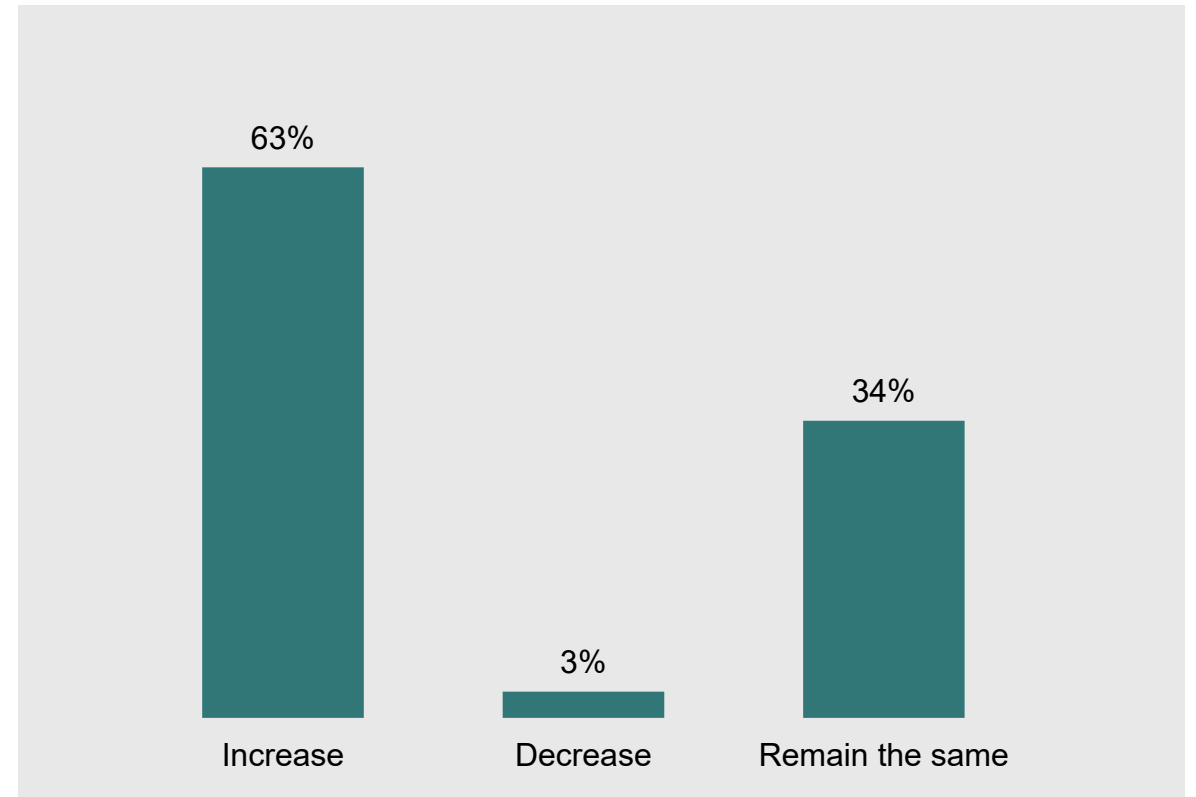
Of 14 consultees who provided reasons why the amount of C1 category vehicles would remain the same, responses included that there would be no need to purchase more vehicles (6), that they would still want/need drivers to pass training (3) and that the cost of insurance premiums would mean that purchasing more vehicles would be too expensive (2).

Q16: Should the C1 licence proposal come into force would your use of C1 category vehicles...?



Base: All who run goods transport services by road (145)

Q17: Should the C1 licence proposal come into force would your amount of C1 category vehicles in your fleet...?



Base: All who run goods transport services by road (135)

C1 entitlement

C1 entitlement

Should C1 entitlement be given to people at the same time as they pass their car (category B) test?

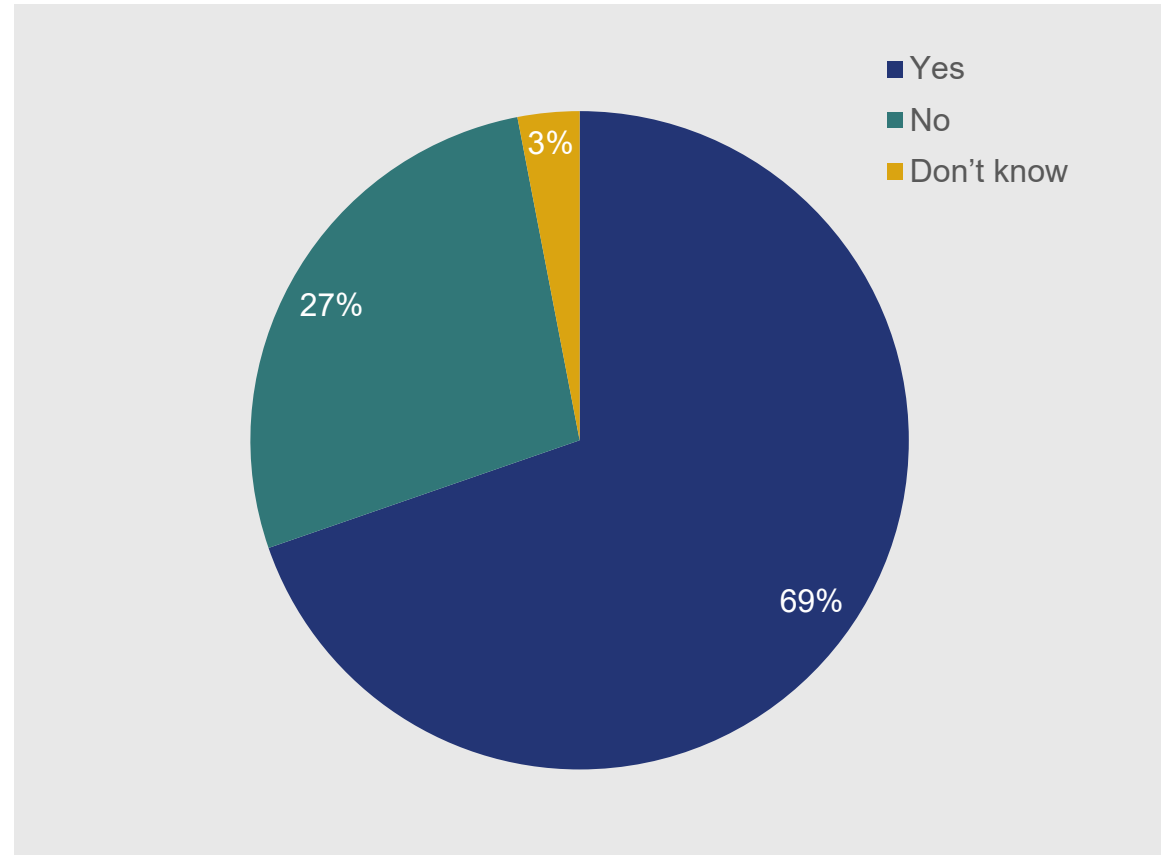
Consultees were asked if they thought that C1 entitlement should be given to people at the same time as they pass their car test. Of 2,053 consultees who answered the question, most (69%) said yes, while around a quarter (27%) said no. A small number (3%) did not know.

Those who did not believe that C1 entitlement should be automatic upon passing a car test were asked to explain their reasons. The main responses were that C1 vehicles are bigger or heavier than cars (216), that risk of accident could be increased (214), that more driving experience would be needed (197), or that more training would be needed (186).

“These larger vehicles require a higher standard of driving and medical fitness to be in place. Without the requirement for further training there would be an increase in accidents and incidents including fatalities.”

Consultees against automatic C1 entitlement were then asked if they wished to continue answering questions about C1 implementation, or to skip to the next section of the questionnaire about Driver Certificate of Professional Competence (DCPC). Of 553 consultees, most (73%) wanted to answer the remaining questions about C1 implementation. These questions are covered in the following sections of this report.

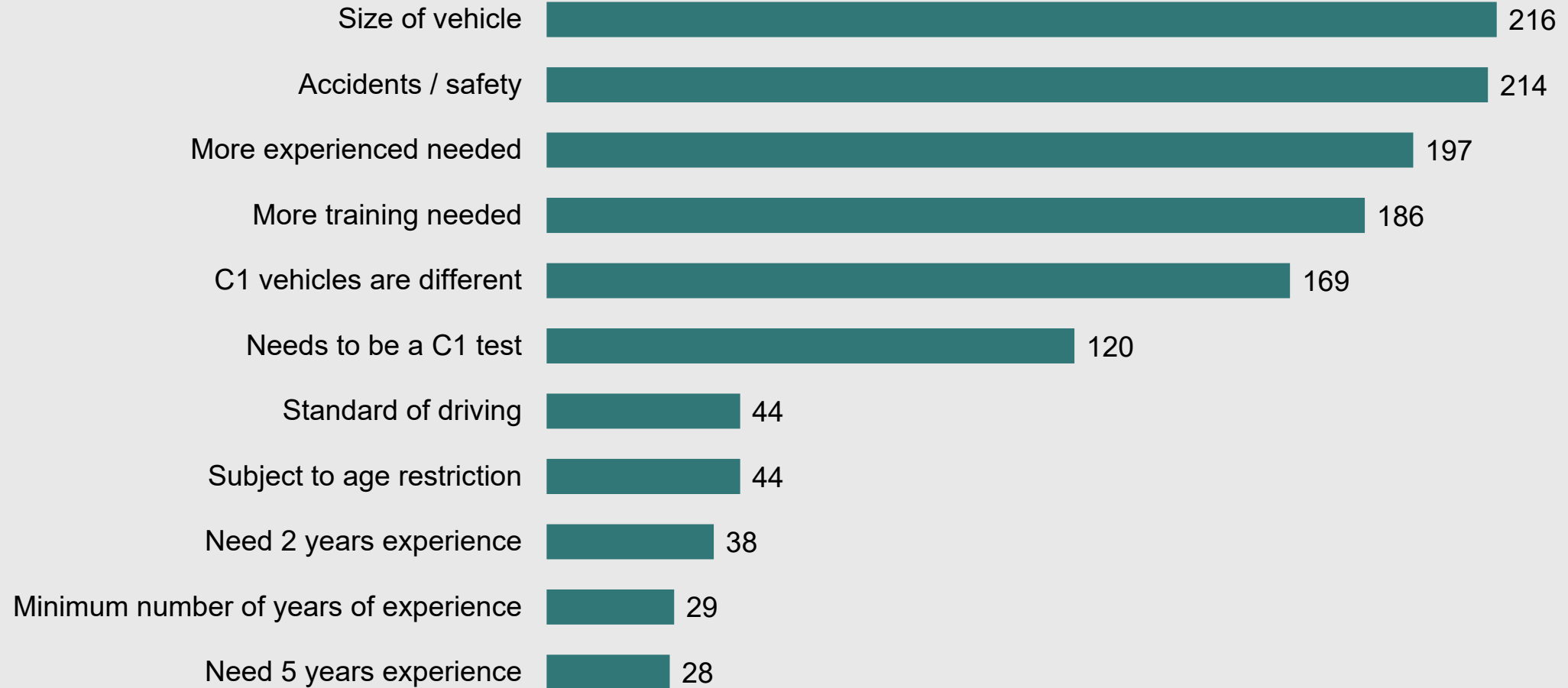
Q18: Should, in your view, C1 entitlement be given to people at the same time as they pass their car (category B) test?



Base: All consultees who answered the question (2,053)

Q19: Reasons against automatic C1 entitlement - comments

Reasons why C1 entitlement should not be given to people at the same time as they pass their car (category B) test - most frequently made comments



Base: All who provided comments (547 consultees)

C1 implementation

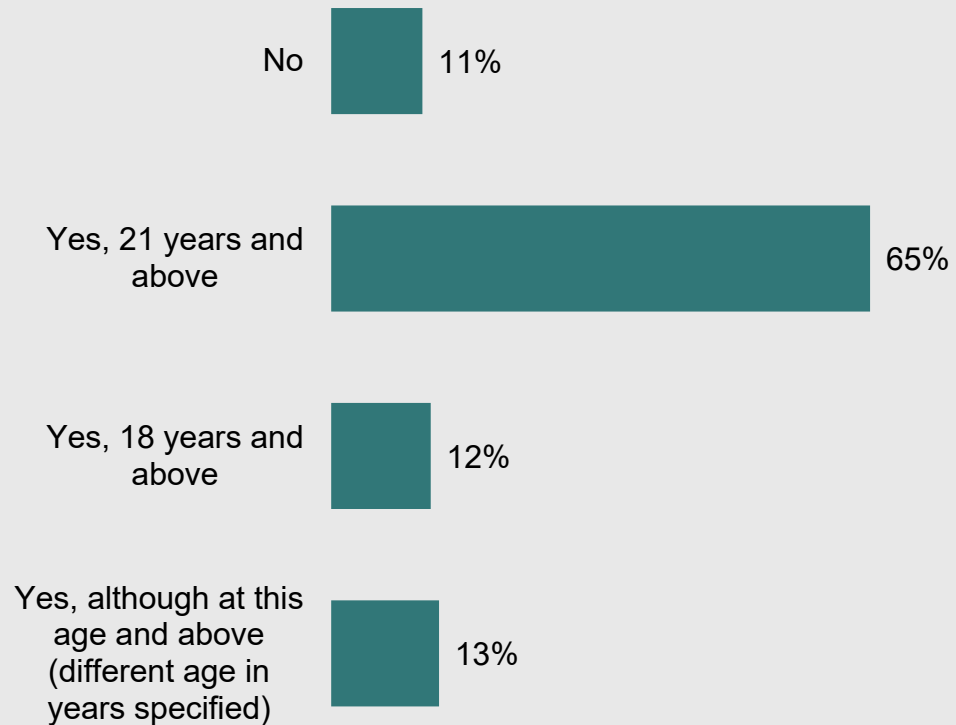
Age restrictions

Consultees were asked if there should be an age restriction to being granted the C1 entitlement upon passing a Category B driving test. Of 1,900 consultees who answered the question, most (89%) agreed including two-thirds (65%) who thought it should be 21 years and above, while around one in eight (12%) thought it should be from age 18+. A further one in eight consultees (13%) specified a different age which ranged from aged 19 to over 30 years of age.

Minimum period of time

Consultees were also asked if there should be a minimum period of time that a driver should hold a car licence before being allowed to drive a C1 vehicle. Of 1,893 consultees who answered the question, most (90%) believed that there should be a minimum period of time. This included half (50%) who thought there should be a minimum period of time of two years and approaching one quarter (23%) thought it should be one year. Just one in ten (10%) did not think that there should be a minimum period of time.

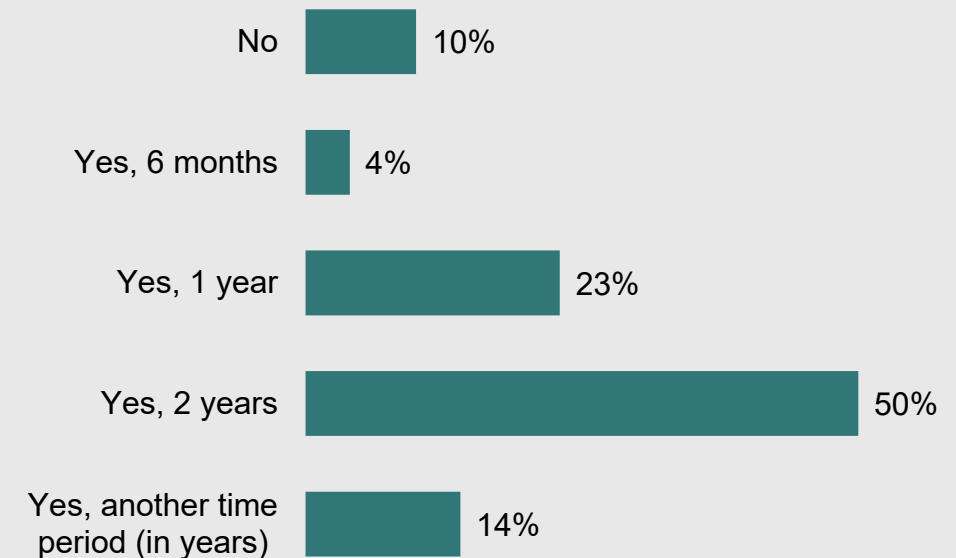
Q21: Should, in your view, there be an age restriction to being granted the C1 entitlement?



Net yes = 89%

Base: All consultees who answered the question (1,900)

Q22: Should, in your view, there be a minimum period of time that the driver should hold the car licence before being allowed to drive a C1 vehicle?



Net yes = 90%

Base: All consultees who answered the question (1,893)

C1 implementation

Requirement to pass a HGV medical to gain the C1 entitlement?

A final question about C1 implementation asked consultees if they thought that drivers should be required to pass a HGV medical to gain C1 entitlement. There were 1,894 who answered the question with the majority (63%) against this requirement. Three in ten (31%) thought that there should be and fewer (6%) didn't know.

Those who said yes or no were asked to give reasons for their answer. There were 554 consultees who provided reasons why they felt that there should be a requirement to pass a HGV medical to gain C1 entitlement. The main comments received were that a HGV medical would ensure fitness to drive (312 responses), that as C1 vehicles are larger / heavier / more dangerous a medical should be a requirement (202 responses), to ensure safety in general (180 comments). Other, less frequently made comments included to test eyesight (44), to ensure standards are being maintained (14) or after a certain age (7).

“This would rule out any drivers who are medically incapable of driving a 7.5 ton vehicle from posing a risk to other drivers on the road. A higher standard of concentration and strains on the human body are required when driving a larger vehicle and so whilst I believe category B drivers have the necessary skills, they must be of a higher medical standard in my opinion, given the larger weight of the vehicle.”

C1 implementation (continued)

Requirement to pass a HGV medical to gain the C1 entitlement?

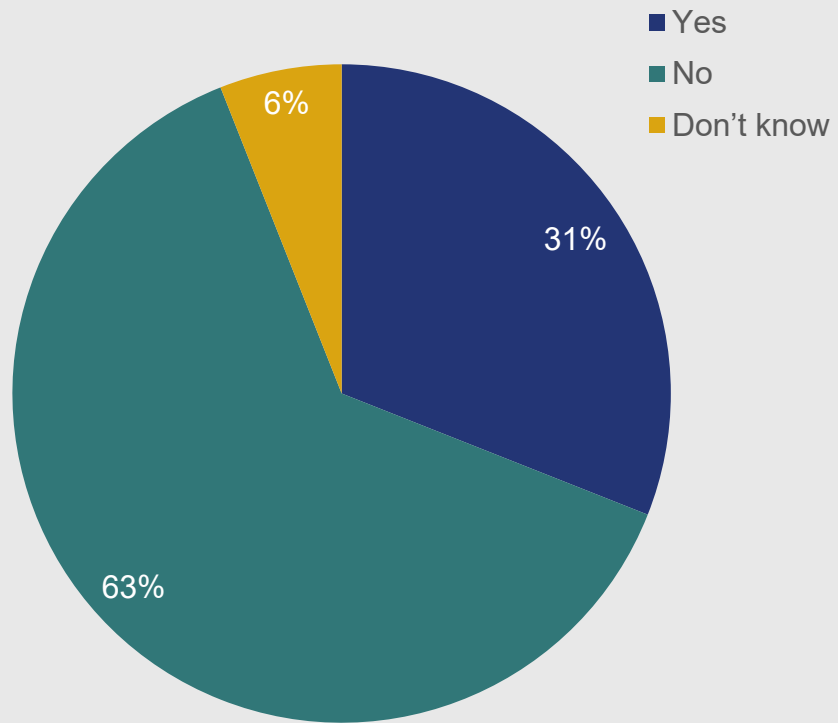
There were 875 consultees who provided reasons why they did not think there should be a requirement to pass a HGV medical to gain the C1 entitlement. A number of reasons were provided for this including that as a HGV medical is not required for a Category B test, that it should not be required to gain C1 entitlement either (224 comments), that C1 vehicles are not HGVs (218 comments), opposition in general (170 comments) and that as it wasn't required for those passing their car test before 1997, that it should not be required now (97).

“I think there is a massive difference to driving HGVs to driving a much smaller vehicles like a mini bus or ambulance. I believe C1 shouldn't need a test and should be given automatically (to) someone (who) is over 21 and has 2 years driving experience.”

“I don't think a medical is needed. There is already a system in place to limit drivers with medical conditions.”

“I am a hopeful paramedic and the prices and procedures to go through with attaining a C1 licence are very off putting. Especially for a university student the price could be well over £1,000 taking everything into account.”

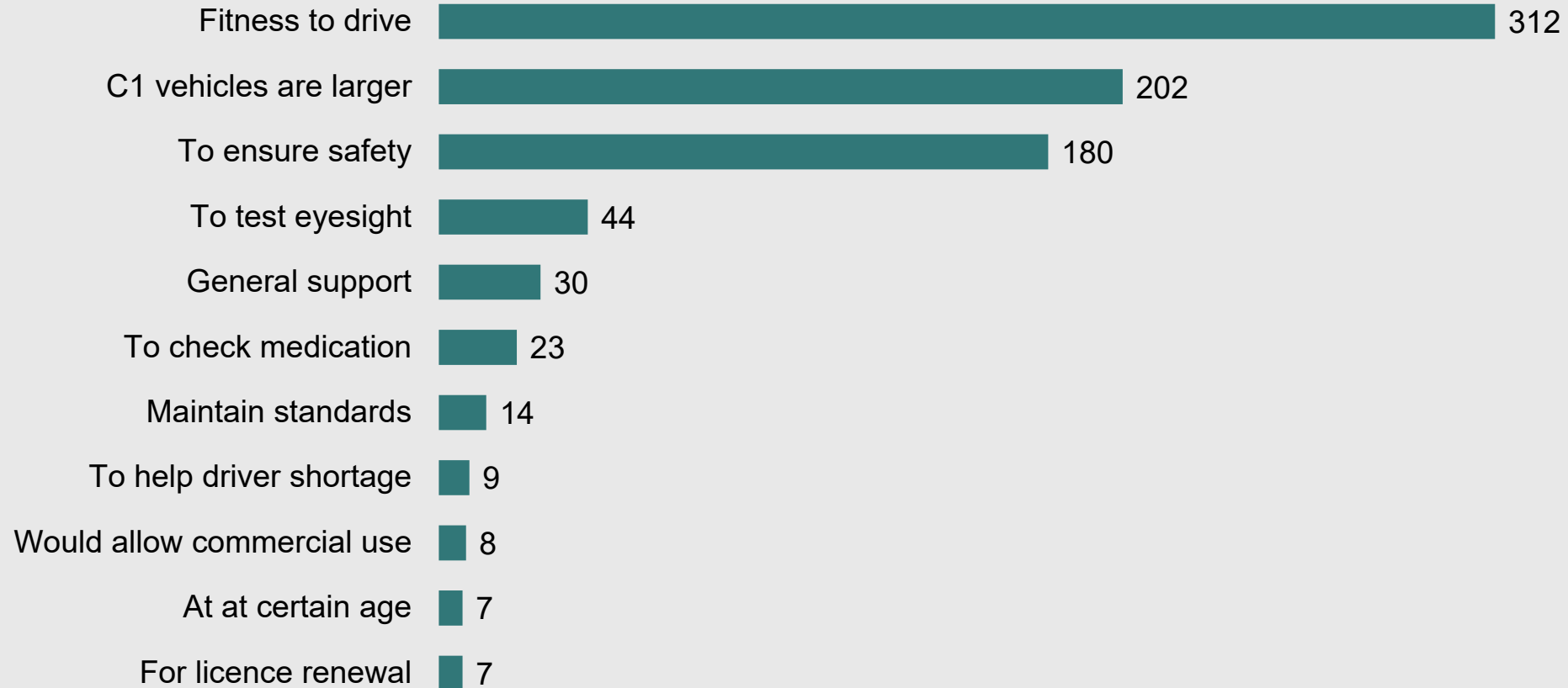
Q23: In your view, should drivers be required to pass the heavy goods vehicle (HGV) medical to gain the C1 entitlement?



Base: All consultees who answered the question (1,894)

Reasons in support of a HGV medical – comments

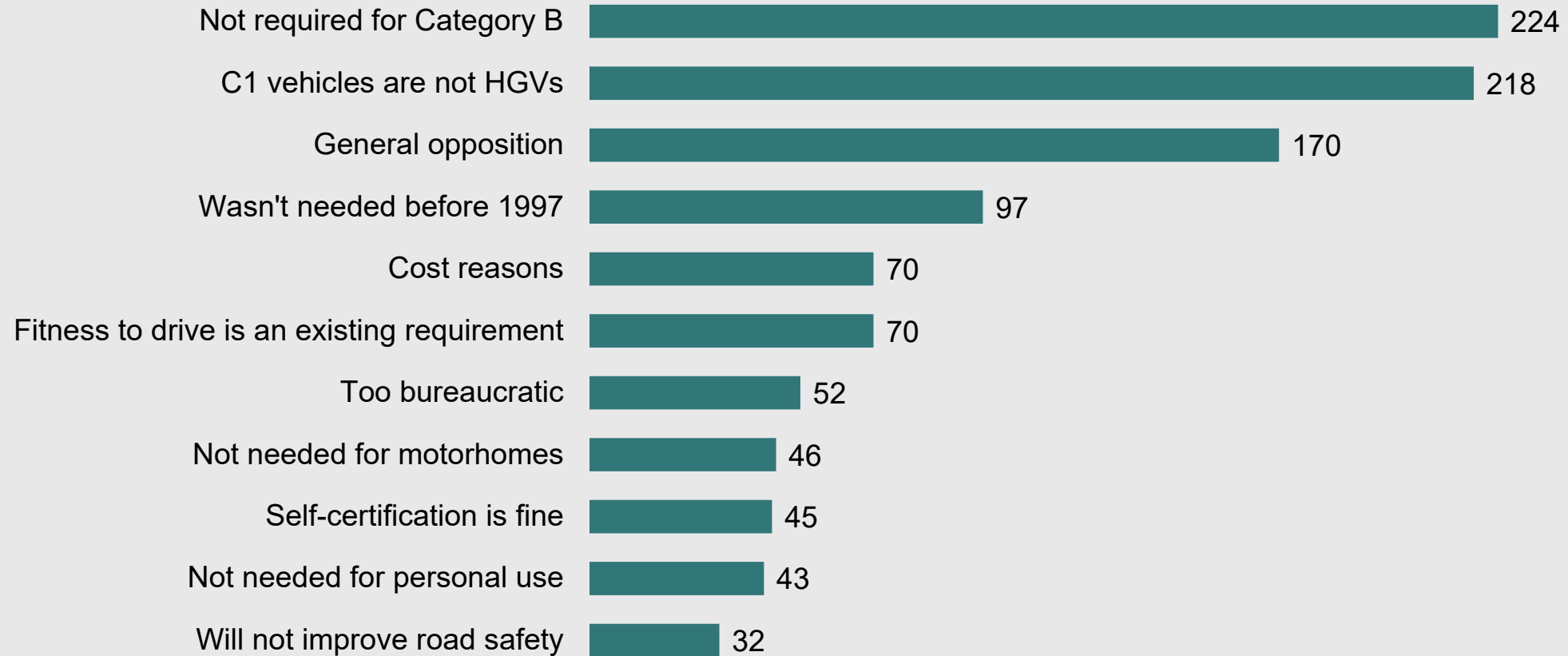
Reasons why drivers should be required to pass the heavy goods vehicle (HGV) medical to gain the C1 entitlement – most frequently made responses



Base: All who provided comments that drivers should be required to pass the heavy goods vehicle (HGV) medical to gain the C1 entitlement (524 consultees)

Reasons against a need for a HGV medical - comments

Reasons why drivers should not be required to pass the heavy goods vehicle (HGV) medical to gain the C1 entitlement – most frequently made responses



Base: All who provided comments that drivers should not be required to pass the heavy goods vehicle (HGV) medical to gain the C1 entitlement (875 consultees)

Driver Certificate of Professional Competence (DCPC)

Driver Certificate of Professional Competence (DCPC)

DCPC exemptions for specific purposes in relation to C1 vehicles

Consultees were asked if they thought there are specific purposes of driving C1 vehicles that should be exempted from DCPC for driving in the UK. Over two-fifths (43%) indicated that there should be, while around one-third (35%) did not think there were specific purposes. Around one in five (22%) did not know.

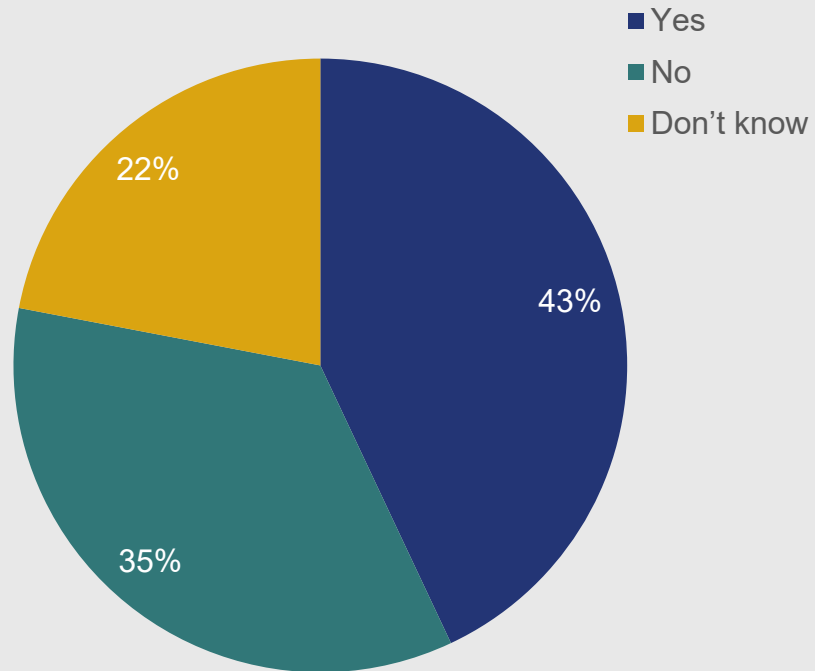
Those who indicated that there should be specific purposes of driving that should be exempted where asked to provide their reasons, of which 775 consultees did so. The main comment was that there should be DCPC exemption for private and non-commercial use of C1 vehicles (308 comments).

Other comments received included that motorhomes and campervans should be exempted (189), vehicles driven for leisure purposes (154), for emergency service ambulances (105) and emergency service vehicles in general (92) and horseboxes (87).

“Non-commercial purposes (e.g. driving a C1 category vehicle for personal use, such as moving house, carrying personal equipment that may be used in a hobby, etc.). This would also allow more drivers to get behind the wheel of a C1 category vehicle and get experience in driving a C1 category vehicle whilst not in the transport industry.”

Other less frequently made comments about exemptions included for delivery drivers (27), hired vehicles (25), farmers (21) and health professionals (18).

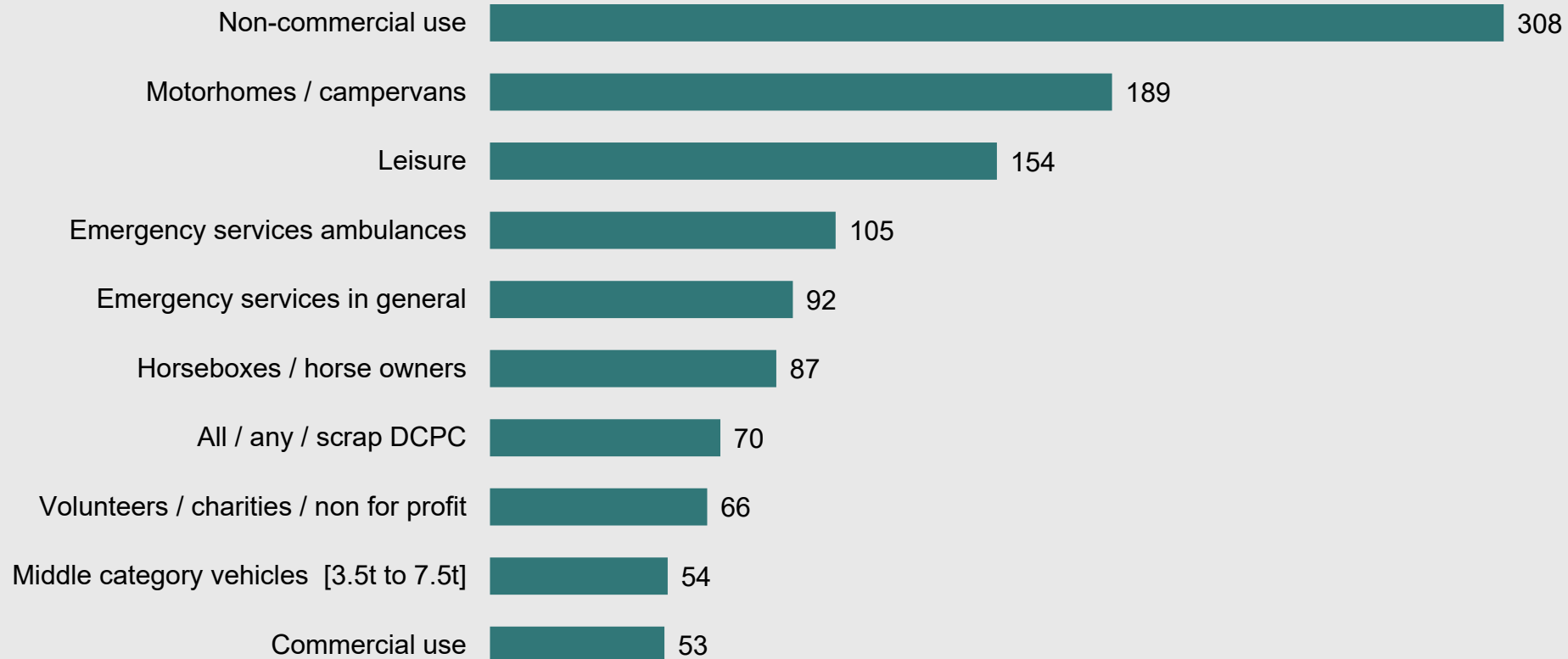
Q25: Do you think there are specific purposes of driving of C1 vehicles that should be exempted from DCPC for driving in the UK?



Base: All consultees who answered the question (2,042)

Driver Certificate of Professional Competence (DCPC) - comments

DCPC exemptions for specific purposes in relation to C1 vehicles – most frequently made comments



Base: All who think there are specific purposes of driving of C1 vehicles that should be exempted from DCPC for driving in the UK and provided comments (775 consultees)

Driver Certificate of Professional Competence (DCPC)

DCPC exemptions for specific purposes in relation to C1 vehicles – evidence

Those who thought that there are specific purposes of driving of C1 vehicles that should be exempted from DCPC were asked to supply evidence at Question 27 on the questionnaire (for example business, road safety and C1 vehicle use). In total, 302 consultees provided comments.

The main comments received by frequency of response were that evidence would be unnecessary or not required (39), that it is expensive (37) and that advance training or blue light training should be sufficient (33).

“CPC is a very onerous responsibility, requiring much time and expense. Only those engaged in commercial transport of other people's goods have enough use of it to make undertaking CPC renewal economically viable.”

“Blue light drivers are already trained to a higher standard than the majority of the driving population. Emergency services also already engage with CPD so mandating CPC will either add a burden or remove them from more job specific ongoing training.”

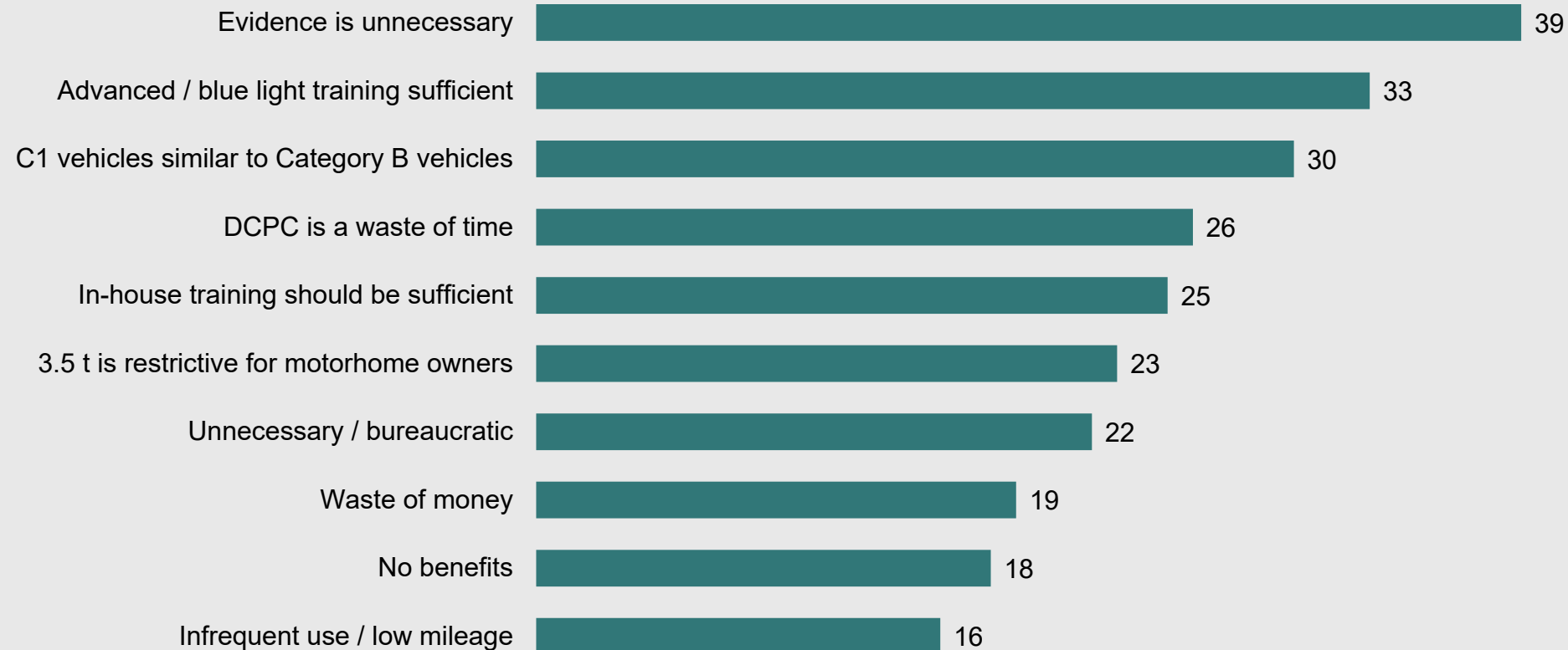
Other less frequently made comments included that in-house training and/or continuous training should be sufficient (25), that DCPC exemption should be mandatory for commercial use (15), or that DCPC was a money making scheme or tick-box exercise (14).

“I gave up driving commercially as I, along with the vast majority of professional drivers considered it nothing more than a money making exercise. Drivers with experience know what they are doing without having to pay £90 to sit in a classroom and then fill out a questionnaire.”

“It does nothing to make you a better driver just another job creation scheme.”

Driver Certificate of Professional Competence (DCPC) - comments

Supply evidence of your opinion about specific purposes (for example business, road safety and C1 vehicle use) – most frequently made comments



Base: All who answered yes at question 27 (302 consultees)

Driver Certificate of Professional Competence (DCPC)

DCPC exemptions for specific groups in relation to C1 vehicles

As well as being asked about purposes, consultees were also asked if they thought if there are specific groups of drivers of C1 vehicles that should be exempted from DCPC for driving in the UK. Of 2,309 consultees who answered the question, two-fifths (40%) believed that there should be and around one-third (35%) did not. One in four (26%) were unsure.

Those who believed that there were specific groups were asked to provide details of such groups. Of 755 consultees who provided a response, the most frequently cited comments were that there should be exemptions for non-commercial use (277), motorhomes and campervans (164), for those driving for leisure reasons (138) and for emergency services including ambulances (110) and emergency services in general (107).

“Those not driving for hire and reward in a professional capacity.”

“Those drivers that are going into the NHS, such as NHS delivery drivers and Ambulance drivers.”

Other less frequently made comments about groups included for horse owners and those towing horse boxes (84), charities and those providing voluntary services (56), minibuses (43) and experienced drivers (38).

“Horse box users because they carry heavy loads.”

“Those that have undertaken a MiDAS assessment or a more focused detailed minibus qualification.”

Those who believed that there are specific groups that should be exempted were asked to provide evidence at Question 30 on the questionnaire. There were 295 consultees who provided comments which were very similar to an earlier question (Q27) which asked about specific purposes. Please see the separate topline/codeframe for more details of the responses.

Driver Certificate of Professional Competence (DCPC)

Alternative training requirements suggested and reasons for these

Consultees were asked if C1 was removed from DCPC should, in their view, alternative requirements (for example training or qualifications) be mandated. Of 2,036 consultees who answered the question, around one third (35%) thought that alternative arrangements should be mandated, while over two-fifths (44%) did not think so. A fifth (20%) were unsure.

In total, 600 consultees provided comments about alternative training requirements. The most frequently provided comments were centred on driver training in general (127), training specific to vehicle (84), road safety training (81) and training on loading and securing loads to vehicles (75).

“At least a 30 or more hours of practise. Any practise is better because it's a larger vehicle and that is quite different from a normal car.”

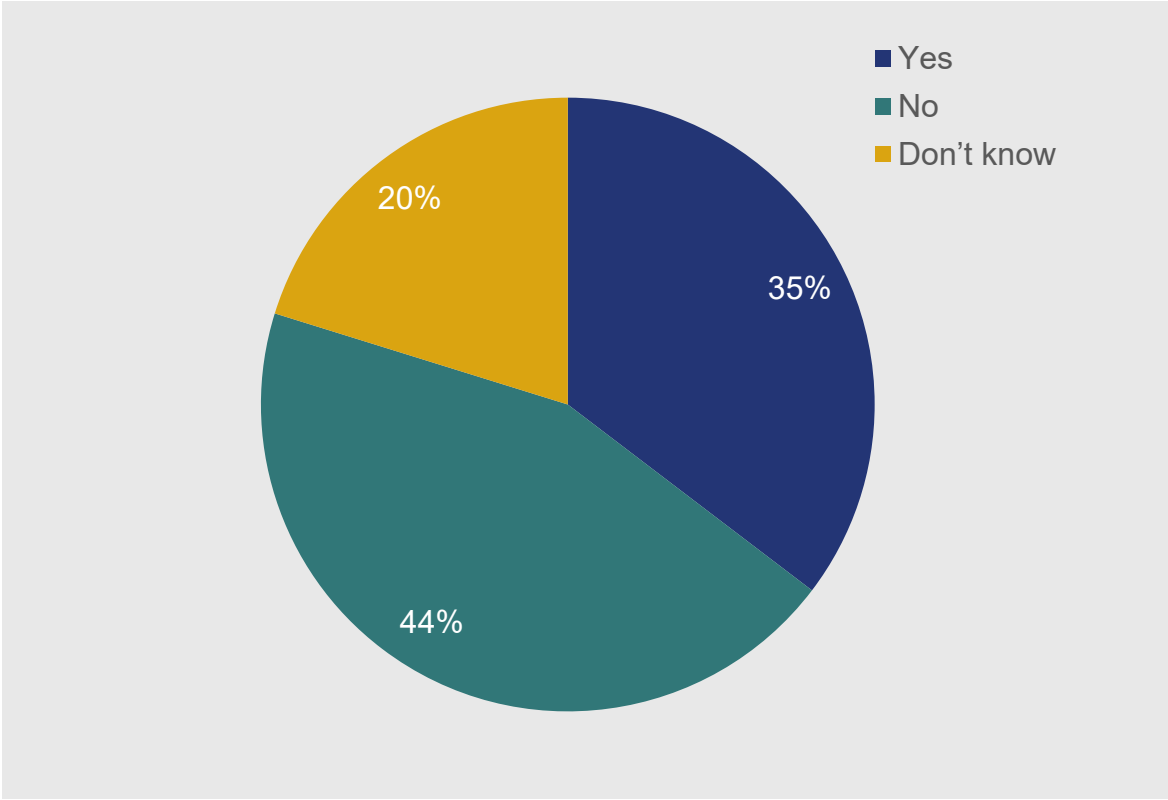
Examples provided in relation to training specific to vehicles included improving awareness of the size of vehicles that people are driving, the need for improved understanding of the longer braking distance of larger vehicles and build broader competence in driving heavier vehicles.

“I think there should be a short course of sorts that is relevant to the specific vehicle you are going to drive.”

Of those who cited road safety training, this was raised due to risks of insecure loads, dangers of faulty vehicles and hazard perceptions associated with heavy goods vehicles, for example.

“Drivers should be made aware of the dangers of being on the road. Dangers of insecure loads and dangers of a faulty vehicle.”

Q31: If C1 were removed from DCPC should, in your view, alternative requirements (for example training or qualifications) be mandated?



Base: All consultees who answered the question (2,036)

D1 Licence Requirement

Removal of D1 licence requirement

Consultees were asked if they would support the removal of the requirement to obtain a D1 licence test to drive a minibus. Of 2,052 who answered the question, most (73%) were supportive. This included three in ten (31%) who were supportive with additional stipulations. Around one in four (23%) were not supportive, while one in twenty (5%) were unsure.

Supportive with stipulations

Those who were supportive dependent upon unspecified additional stipulations were asked to indicate from a tick-list what those additional stipulations should be. Most of these consultees believed that there should be a minimum age requirement (86%). This was followed by around half (49%) who thought that there should be a mandatory requirement to undertake additional training such as MiDAS and two-fifths (41%) who believed that there should be compulsory medical requirements. Around three in ten (29%) believed that there should be compulsory conduct requirements and/or requirements at renewal stage (also 29%). Around one in six (16%) thought that there should be another stipulation.

Unsupportive

Those who were against D1 requirement removal were asked about their concerns. Of 461 consultees who answered the question, most (92%) raised safety concerns, three-fifths (61%) had concerns about poor driver skills and one-fifth (21%) indicated other concerns. Other concerns included worry about inexperience of younger drivers, impacts on driving standards and that it could be dangerous.

Removal of D1 licence requirement (continued)

Those who raised safety concerns for not supporting removal of the requirement were asked to supply any views and evidence they had on whether the change would have a negative or positive impact upon road safety. There were 270 consultees who provided comments of which almost all (267) provided negative comments about impact on road safety.

The main negative comments received by frequency of response included negative impact on road safety risk to multiple passengers (132), negative impacts on road safety due to lack of training (97), that additional road safety training is needed (68) and that a safety test would be needed (67).

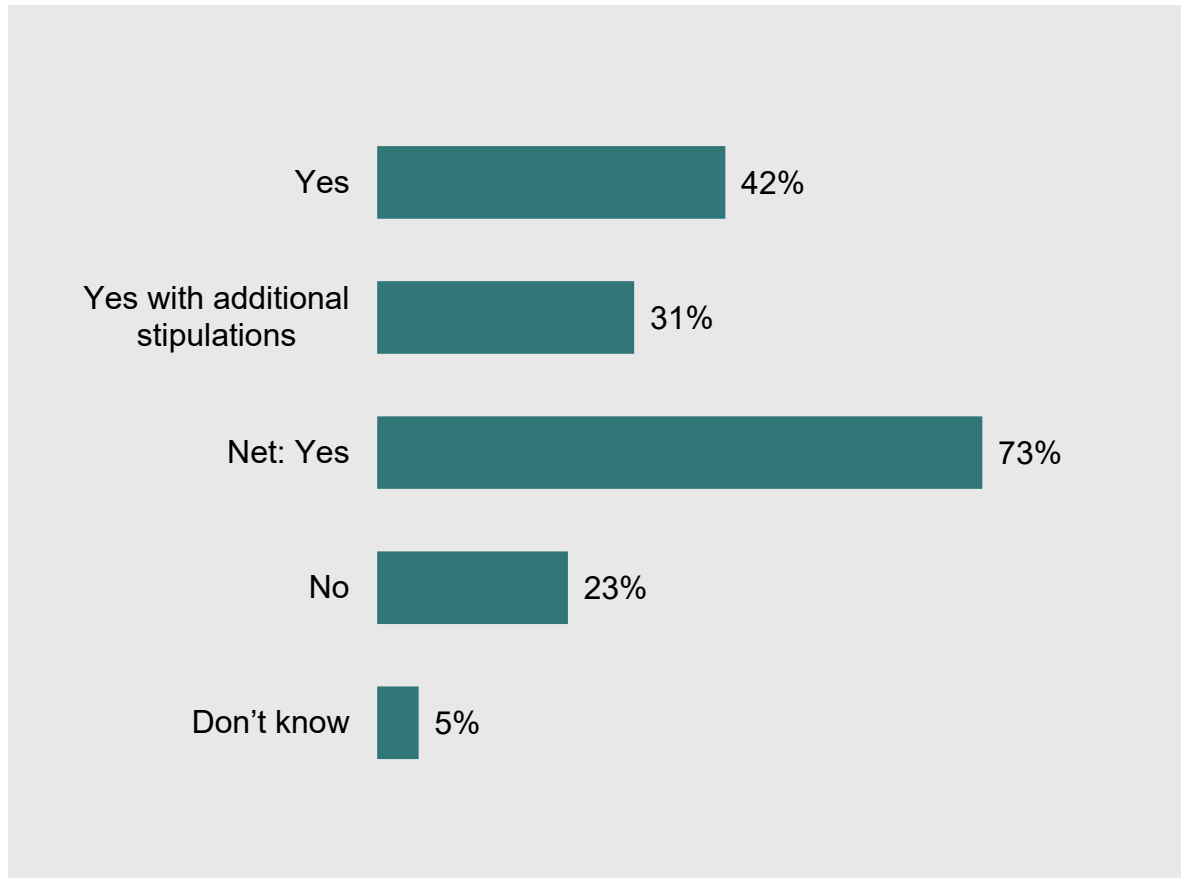
“I am a qualified technician working for the ambulance service. I drive an ambulance (C1) every day in emergency conditions (blue lights) and non emergency conditions (normal C1 driving). I see the standards of every day drivers it is poor. I know the capabilities of the ambulance and how dangerous it could be. To give this licence to any typical driver is a mistake that will cost lives. There will be an increase in fatalities on the road.”

“Driving standards are generally deteriorating. Allowing people not fully trained can only have a negative impact on road safety.”

Supply of minibus drivers

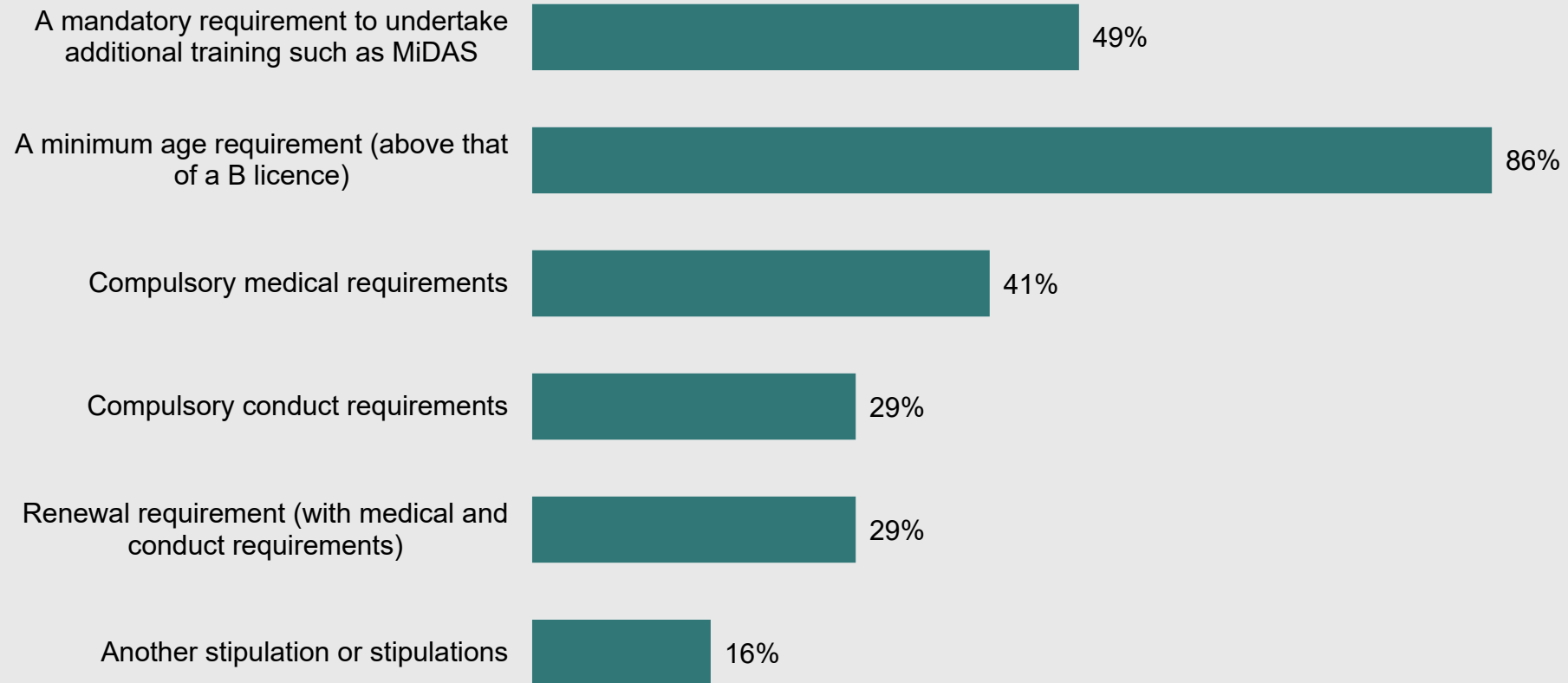
All consultees were then asked about impact on supply of minibus drivers if the requirement to obtain a D1 licence to drive a minibus were to be removed. Most (84%) believed this would increase the supply of such drivers.

Q33: Would you support the removal of the requirement to obtain a D1 licence test to drive a minibus?



Base: All consultees who answered the question (2,052)

Q34: What additional stipulations would you recommend?



Base: All who support the removal of the requirement to obtain a D1 licence test to drive a minibus, but require additional stipulations (628)

Q35: Would you support these 'additional stipulations' applying to individuals?

This table shows levels of support at Q35 dependent on stipulations selected at Q34. Example, 69% of those who selected a mandatory requirement to undertake additional training such as MiDAS at Q34 would support this applying to individuals when driving a vehicle under a Section 19 or 22 permit.

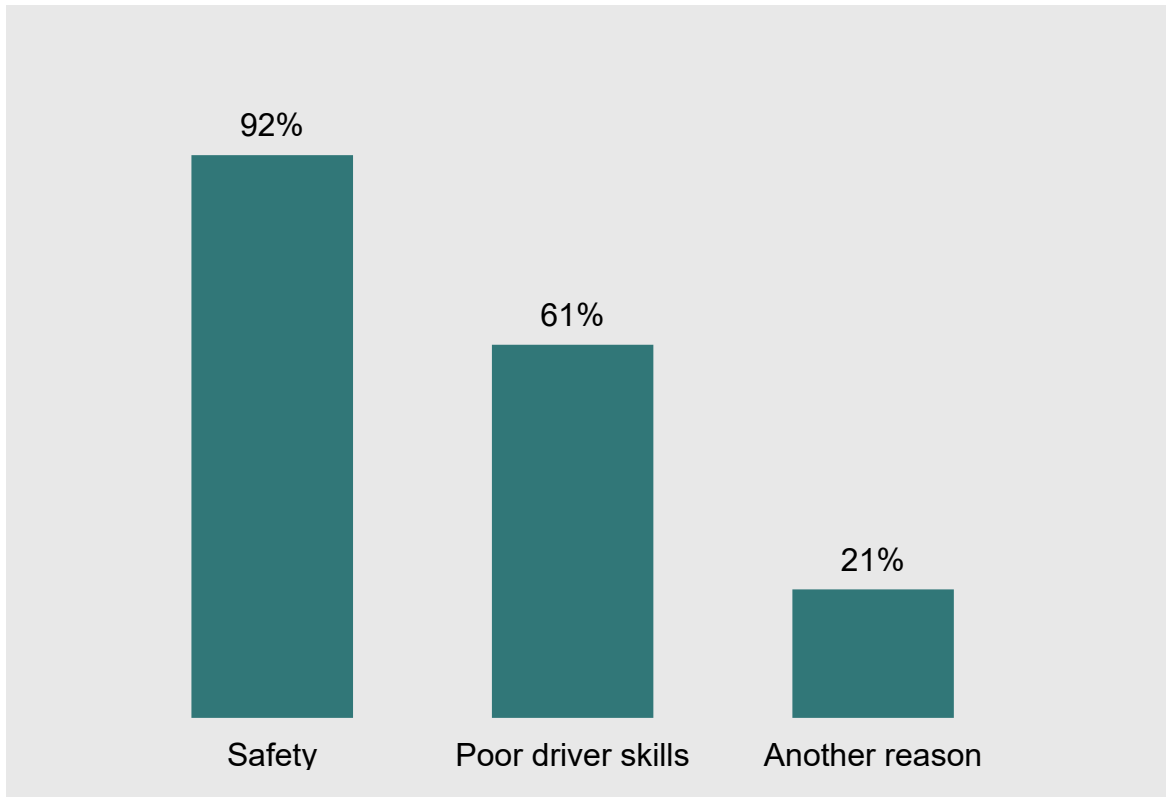
Q34: What additional stipulations would you recommend?

Q35: Would you support these 'additional stipulations' applying to individuals?

	A mandatory requirement to undertake additional training such as MiDAS	A minimum age requirement (above that of a B licence)	Compulsory medical requirements	Compulsory conduct requirements	Renewal requirement (with medical and conduct requirements)
<i>Total base (628)</i>	308	543	256	181	184
When driving a vehicle under a Section 19 or 22 permit	69%	53%	55%	60%	63%
The commercial carriage of passengers under a Section 19 or 22 permit under a short distance exemption	1%	1%	1%	1%	2%
When driving a vehicle under a PSV Licence	46%	43%	48%	51%	51%
At other times when driving a minibus	9%	7%	8%	8%	9%
No	18%	32%	28%	26%	24%

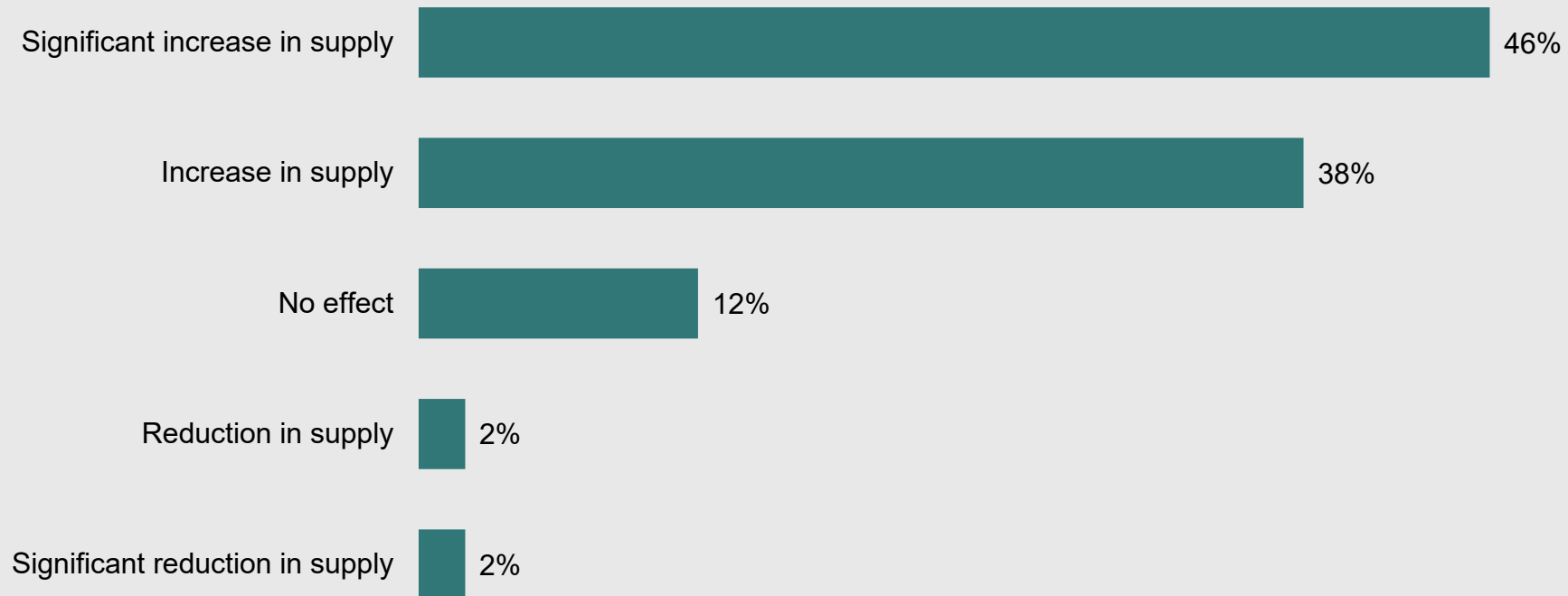
Base: All who support the removal of the requirement to obtain a D1 licence test to drive a minibus, but require additional stipulations (628)

Q36: What are your main concerns for not supporting a removal of the requirement?



Base: All who do not support removal of the requirement to obtain a D1 licence test to drive a minibus (461)

Q38: In your view if the requirement to obtain a D1 licence to drive a minibus were to be removed, what impact do you think this would have on the supply of minibus drivers?



Base: All consultees who answered question 38 (2,035)

Removal of D1 licence requirement

Effect on cost of running taxis and PHVs

Consultees were asked about the impact of the removal of the D1 licence on the cost of running taxis and PHVs. Few (6%) believed that it would increase the costs of running such vehicles. Around one-third (32%) thought that running costs would decrease and a similar proportion (31%) believed there would be no impact. Three in ten (30%) were unsure about impact on running costs.

Consultees were then asked to explain their reasons. In total, 277 consultees provided comments about how they believed running costs would be reduced. The main comment was that there would be more drivers available (144), followed by lower training costs (61) and that the impact would generally reduce running costs without specifying further.

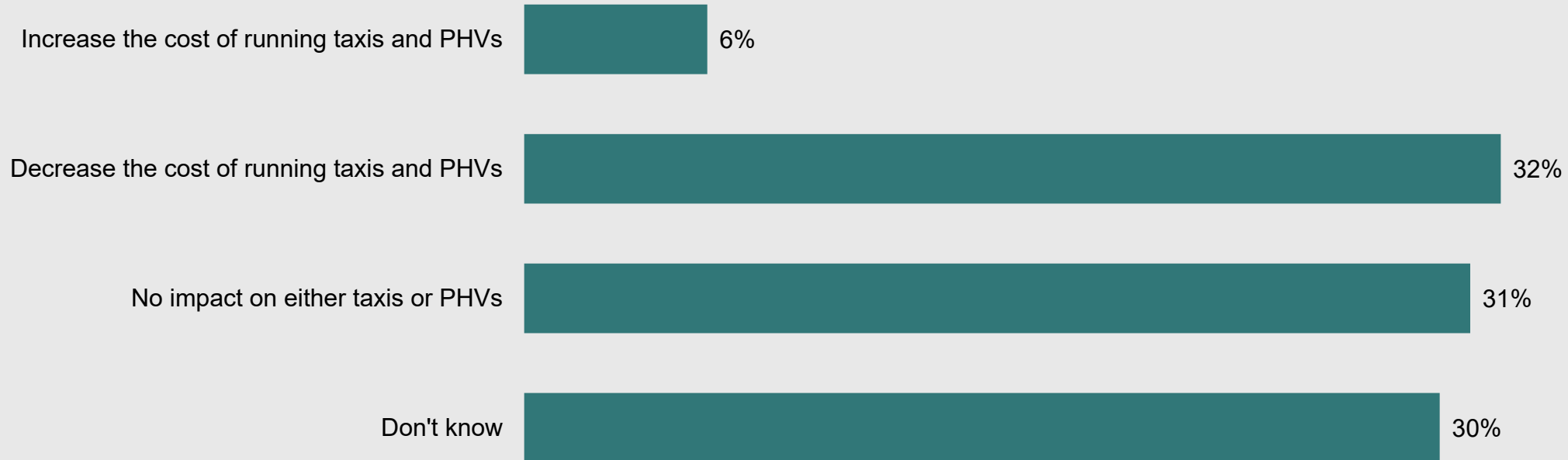
“I think it would reduce the cost of running these services because more drivers would in abundance which would lower advertising costs and other potential costs involved in training.”

There were 156 consultees who did not believe running costs would be impacted. The main comments received were that there would be no impact in general (46) and also that removal of the D1 licence requirement would not correlate with running costs (also 46 comments).

Of those who believed running costs would increase, the main comment was that insurance premiums would be higher (22 comments) as there could be a reduction in the standard of driving.

“I expect insurance will become more expensive because the drivers are riskier and that will be passed on.”

Q39: What effect do you think the removal of the D1 licence requirement would have on the cost of running taxis and PHVs?



Base: All consultees who answered the question (2,037)

Removal of D1 licence requirement

Impact on driver wages

Consultees were asked if they believed that driver wages could be affected if the D1 licence requirement was removed. As is seen in the following charts, around half or more consultees believed drivers wages would be unaffected. Slightly more consultees believed that driver wages would fall rather than increase.

Some of those who provided comments believed driver wages would increase as there would be demand for additional drivers.

“Higher demand would likely mean more HR will be needed which means attracting i.e. increasing wages.”

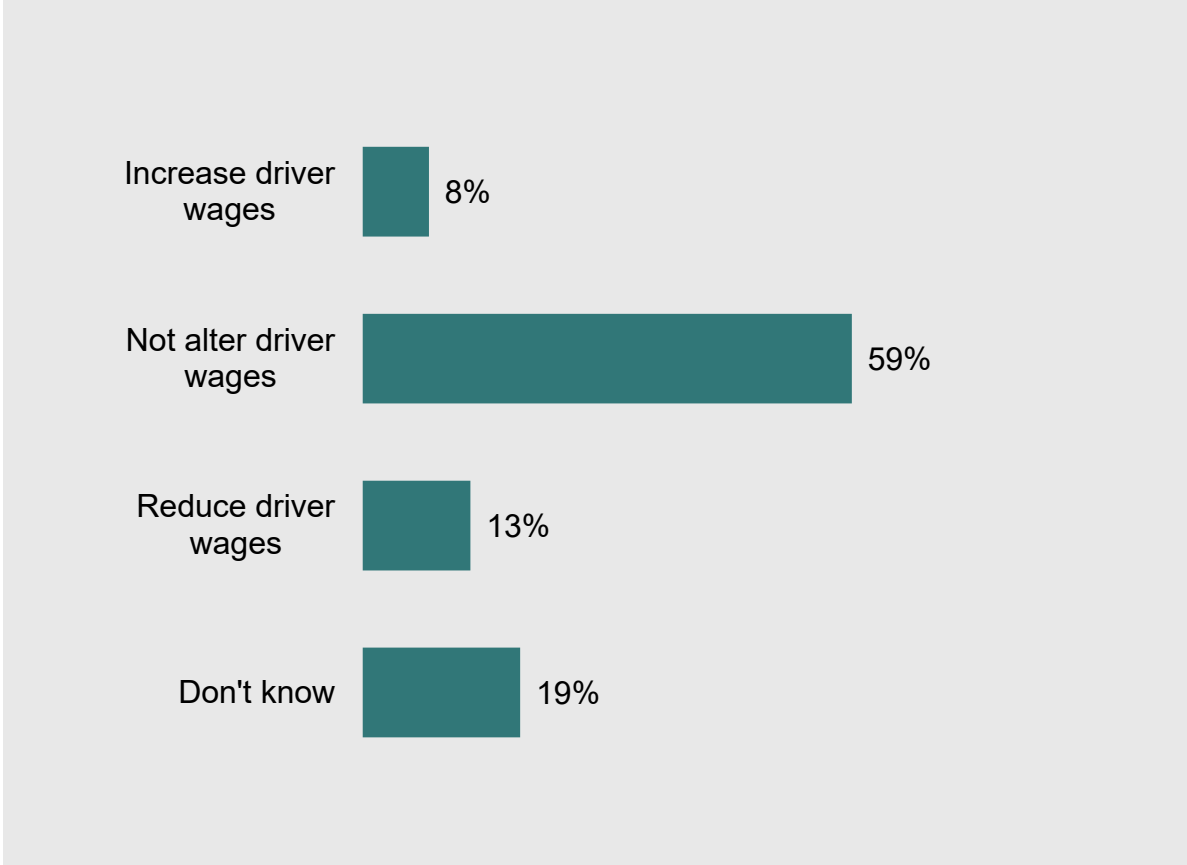
Of those who believed wages would remain static, reasons provided included that drivers would still be in demand given professional driving is a responsible job.

“These are still responsible jobs with society and removing the licence restrictions wouldn’t change that. It would simply mean any shortages in drivers would disappear.”

Reasons provided as to why wages could fall included a view of supply and demand with an increased number of drivers in the pool leading to suppressed wages.

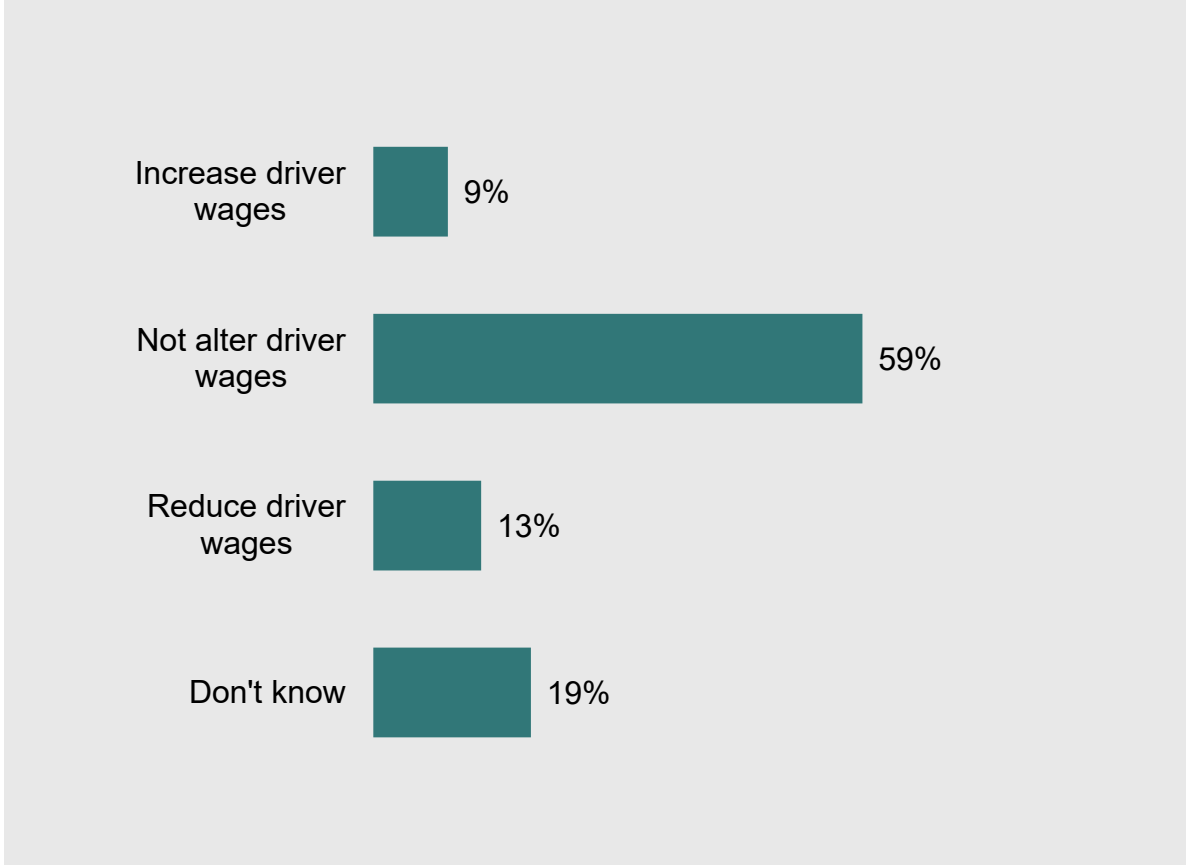
“Greater supply, less demand, therefore a race to pay the lowest amount.”

Q40a: In your view, what impact would the removal of the D1 licence requirement have on: Bus Drivers?



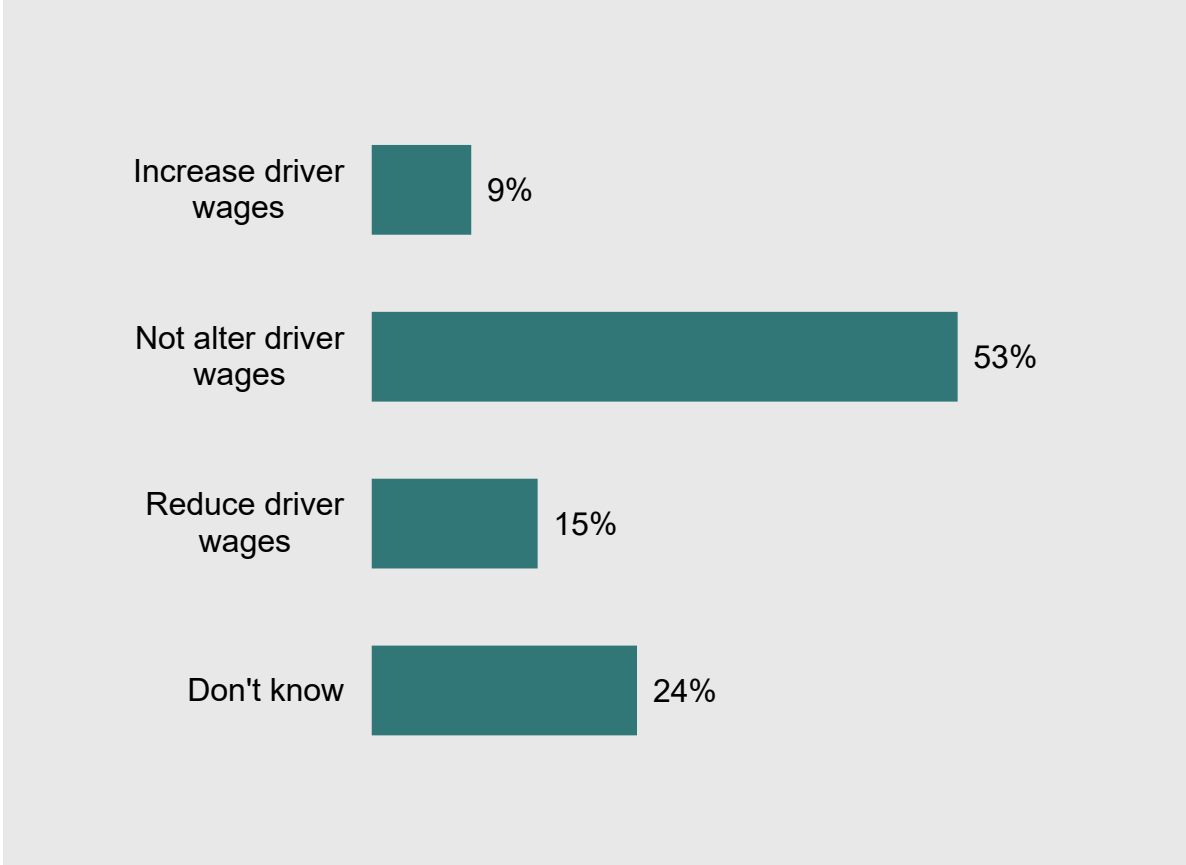
Base: All consultees who answered the question (1,981)

Q40b: In your view, what impact would the removal of the D1 licence requirement have on: Coach Drivers?



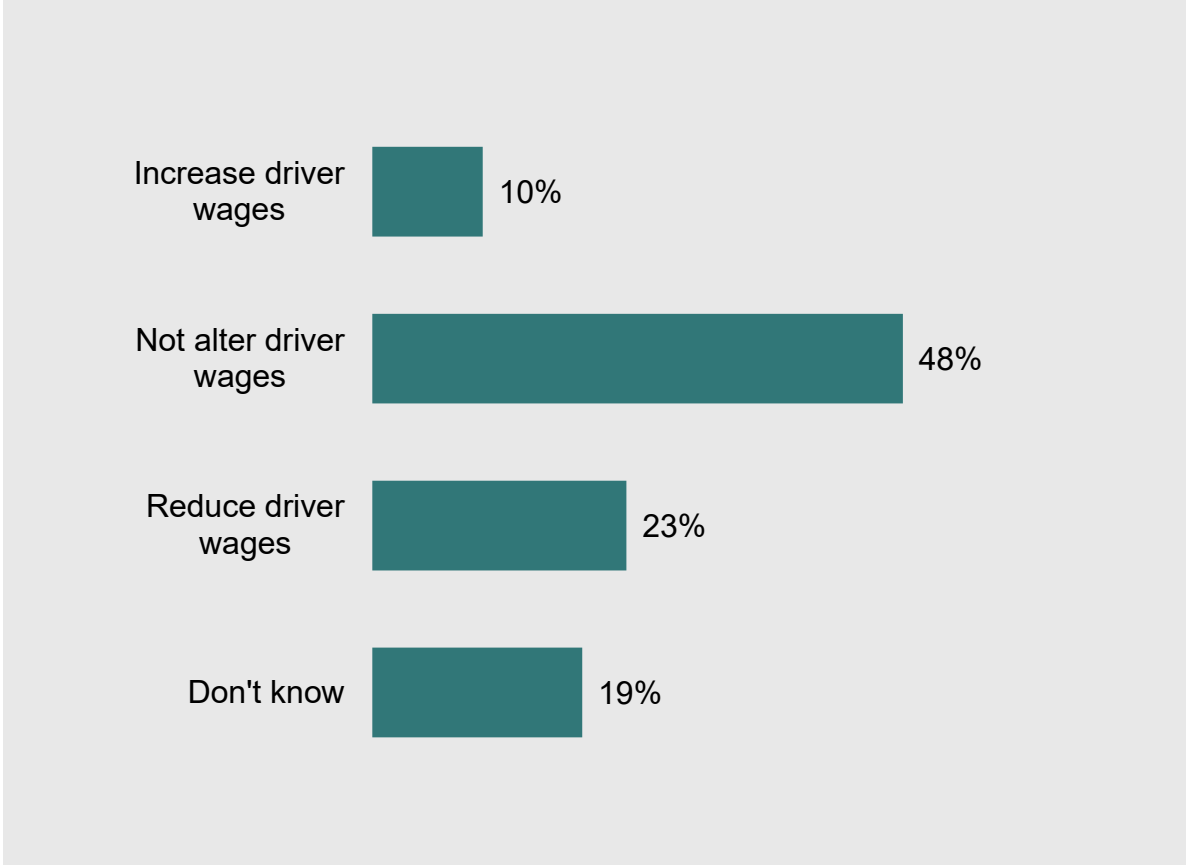
Base: All consultees who answered the question (1,972)

Q40c: In your view, what impact would the removal of the D1 licence requirement have on: PHV Drivers?



Base: All consultees who answered the question (1,968)

Q40d: In your view, what impact would the removal of the D1 licence requirement have on: Minibus drivers?



Base: All consultees who answered the question (1,993)

Changes to raise the standards of HGV instruction and to improve pass rates

Introduction of a standardised instructor training and qualification programme

Two-thirds (64%) of consultees agreed with the introduction of a standardised instructor training and qualification programme. Around one in seven (14%) did not agree and a fifth (21%) were unsure. Those who agreed were asked if there should be a voluntary or mandatory requirement. The majority (72%) indicated that there should be a mandatory requirement.

List of instructors

All consultees were asked if there be a mandatory register of HGV instructors managed by the Driver and Vehicle Standards Agency. Most (74%) agreed that this should be in place compared to around one in eight (12%) who did not agree. One in seven (14%) consultees were unsure. Those who agreed that a mandatory register should be in place were then asked if it should include public service vehicles and/or passenger carrying vehicles (PCVs). Just over four-fifths (82%) believed it should include PCVs while approaching nine in ten (88%) thought it should include public service vehicles.

Introduction of a standardised instructor training and qualification programme (continued)

Pass rate publication

Just over half (55%) of consultees agreed with the publication of pass rates achieved by instructors. A fifth (20%) did not agree and one in four (25%) were unsure. Those who agreed or disagreed were asked to provide reasons.

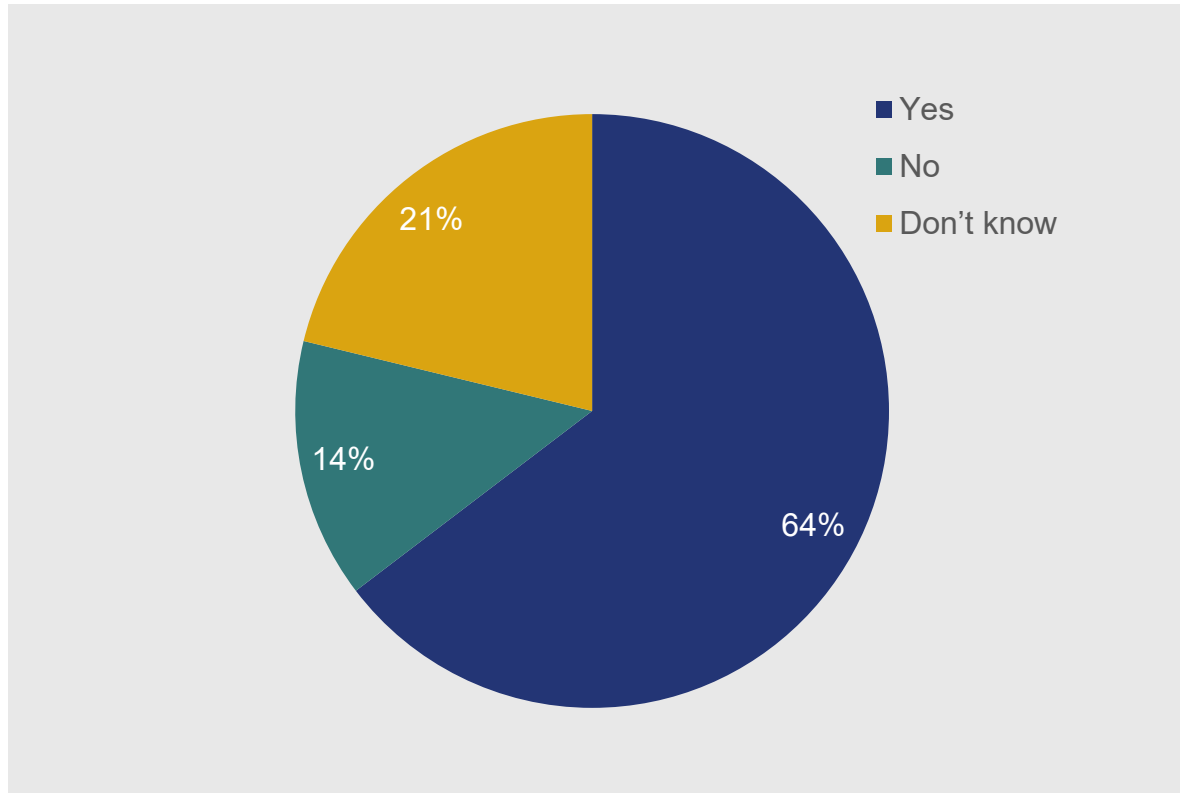
There were 745 consultees who provided reasons in support of the publication of pass rates. The main comments received by frequency of response where it would allow informed choice (214), for quality control purposes (206), to ensure the information is in the open (140) and is transparent (131) and that training standards would be improved (114).

“This will enable good instructors to earn a higher wage as they are 'best' of their trade. This will also allow students/candidates to better select a driving school & instructor.”

On the other hand, there were 301 consultees who did not think that pass rates achieved by instructors should be published. A main comment was a belief that pass rates would not on their own reflect quality of training provided (138). Other less frequently made comments included it could lead to corruption and falsification of results (42) and that it could be discriminatory or unfair (33).

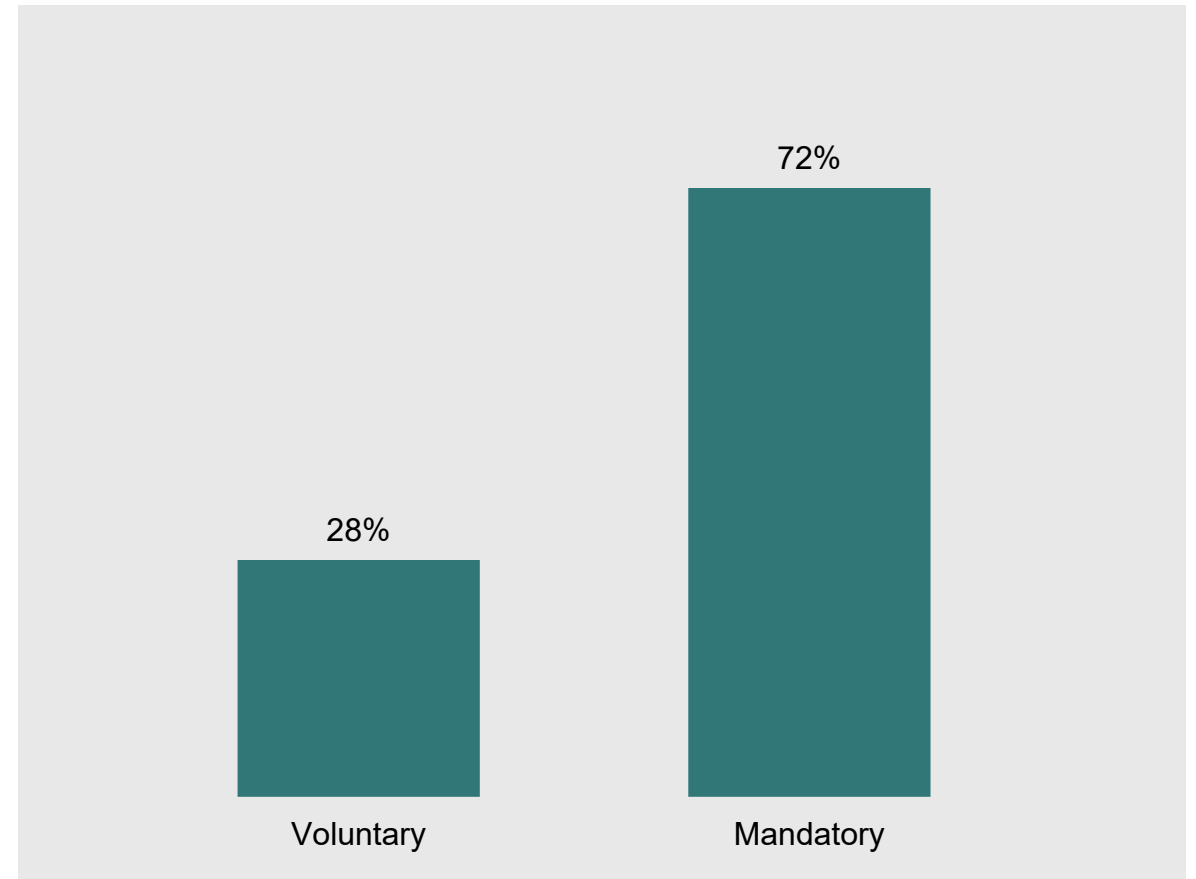
“Pass rates tell you nothing useful about quality of instruction they only tell you whether the instructor is good at predicting when a student is capable of passing a test.”

Q41: Do you agree with the introduction of a standardised instructor training and qualification programme?



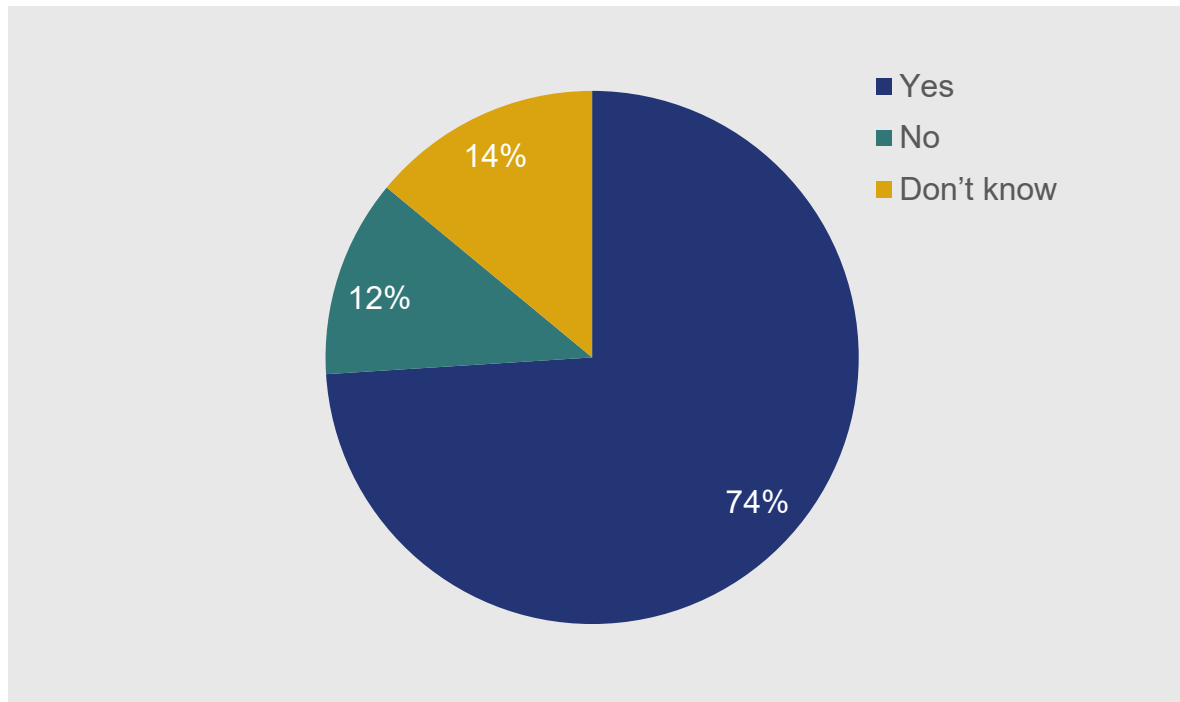
Base: All consultees who answered the question (2,030)

Q42: This should, in your view, be?



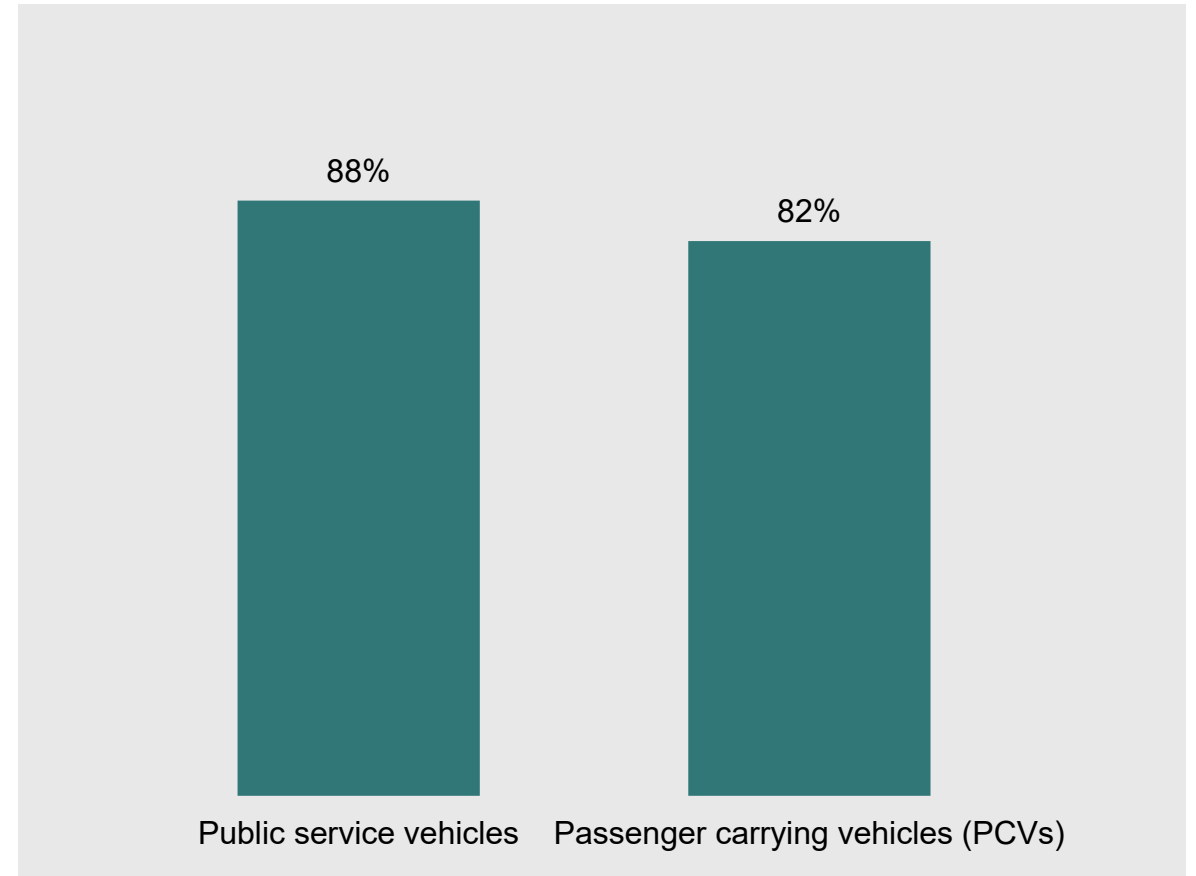
Base: All who agree with the introduction of a standardised instructor training and qualification programme (1,303)

Q43: Should, in your view, there be a mandatory register of HGV instructors managed by the Driver and Vehicle Standards Agency?



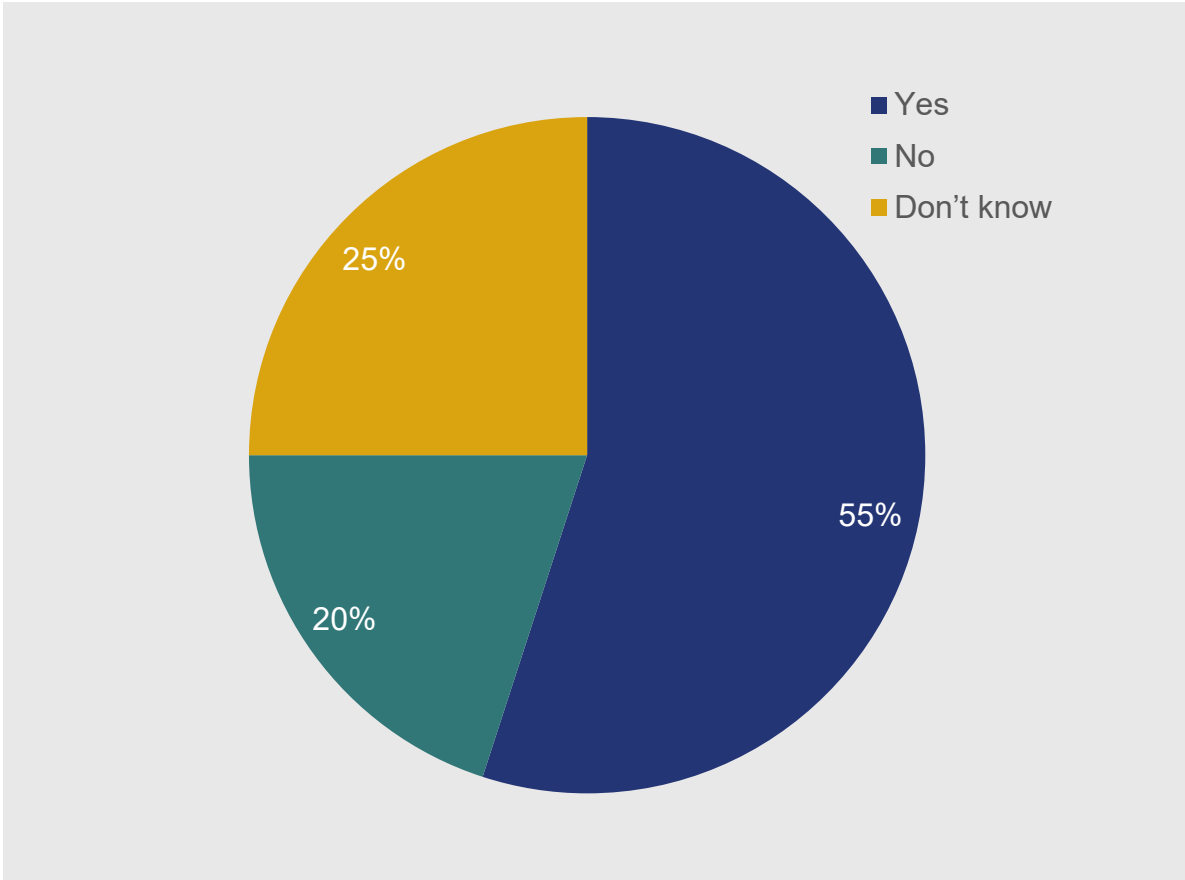
Base: All consultees who answered the question (2,037)

Q44: If the instructor register was introduced, in your view, should it include?



Base: All who believe that there be a mandatory register of HGV instructors managed by the Driver and Vehicle Standards Agency (1,422)

Q45: Do you agree with the publication of pass rates achieved by instructors?



Base: All consultees who answered the question (2,034)

Other licensing changes

Other licensing changes

Views on entitlement to drive PCVs on a HGV licence for maintenance and repair purposes

Consultees were asked if they would agree that entitlement should be changed to allow persons with category C entitlement to drive PCVs on their HGV licence for maintenance and repair purposes. Of 2,028 consultees who answered the question, most (75%) agreed. Around one in twelve consultees (8%) did not agree and a fifth (18%) were unsure.

Estimated costs and savings of the proposal

Consultees were then asked about estimated costs or savings to them or their business if HGV licence holders were to be entitled to drive PCVs. Most consultees did not provide a response to this question. Of 215 consultees who did provide a response, the most frequently cited comments were around savings on training costs (56), or test fees (54), or savings in general (42).

“Clearly it is absurd that an HGV driver can't drive an empty bus. Whilst I don't have a transport business, it would clearly increase flexibility and reduce unnecessary expensive training.”

“It would save companies and individuals from undertaking training and tests that they do not need. An empty PCV has no people.”

Other licensing changes (continued)

Evidence on positive or negative impacts upon safety of permitting HGV licence holders to drive PCVs for maintenance and repair purposes

Consultees were asked to provide their views and evidence about the proposal to allow HGV licence holders to drive PCVs for maintenance/repair purposes. There were 362 consultees who provided comments. The main comments received were that HGVs and PCVs are very similar (52), that it would help with driver shortages (47) and would create job opportunities (36).

“HGV licences should be able to drive a D1 category vehicle as they have had the medical, exams and tests etc and have had further training.”

“I feel we have to trust in our younger generations that they will be safe upon operating a larger vehicle. If this means we can employ more people easily in the transport sector and opportunities for small scale businesses to emerge.”

Other licensing changes (continued)

D1E entitlement to those holding C1, C1E and D1 licences

Consultees were asked if they believed D1E entitlement should be granted to those who are already entitled to drive smaller/lighter categories of vehicles. Over half agree with both C1 and D1 licence holders (56% and 58% respectively), rising to two-thirds (67%) of C1E licence holders.

There were 432 consultees who provided supportive comments with the most frequently cited comments being that drivers are already experienced (96), there are similar driving characteristics (87), it would help alleviate driver shortages (71) and provisional support provided additional training is undertaken (47).

“I think anyone who has taken an assessment and passed for a B+E category should be permitted to have this class with any other entitlement for C1 or D1 up to MAX of 3500KG, tailers with airbrakes will require additional assessment on safety grounds.”

There were 262 consultees who provided comments in opposition to the proposal. The main comments here were to do with different driving characteristics (81), that there should be additional training before entitlement to D1E (77) and that there should be a test or assessment (73).

“Drivers need to prove their capabilities and their understanding of the responsibilities attached to driving vehicles that present a much higher risk to other road users.”

Other licensing changes (continued)

D1E entitlement to those holding C1, C1E and D1 licences – costs / savings

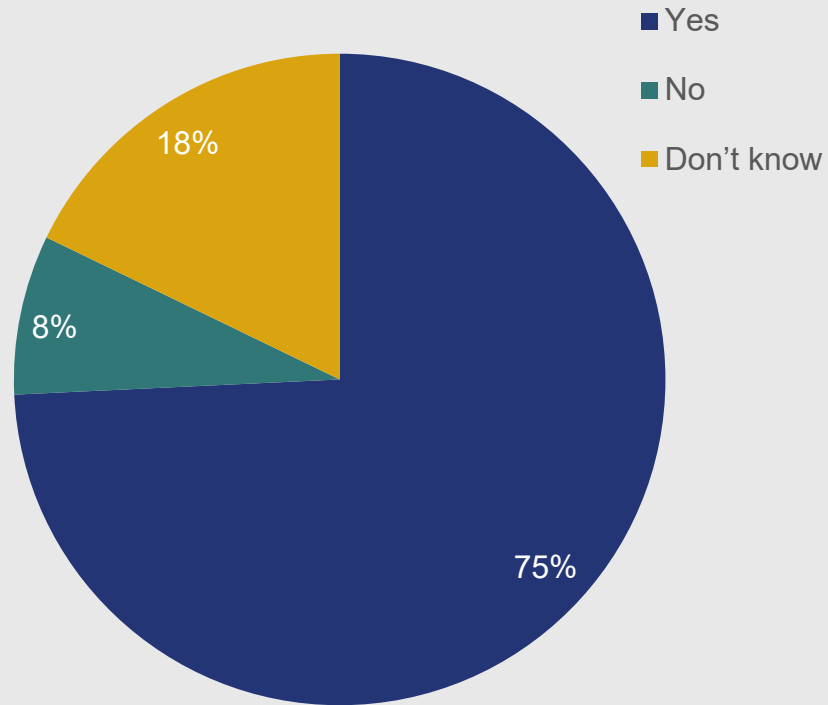
Consultees were also asked about estimated costs or savings if the proposal was implemented. There were 225 consultees who provided comments of which the main comments revolved around savings. This included saving on test fees (56), training fees (42) and estimated savings in GB pounds (example, there were 29 comments above savings between £1,000 and £4,999).

“I would personally save approximately £2,500 just in doing the test. Then save £100 a trip to pay someone to drive my horsebox.”

Consultees were asked to supply any views and evidence they have on whether the proposed change would have a negative or positive impact upon road safety. There were 39 consultees who provided positive comments, while 130 consultees provided negative comments. A further 99 consultees believed that the proposal would not have any impact on road safety.

The main comments about negative impact were that the proposal would reduce safety levels overall (83), as well as concerns about lack of experience and training (50).

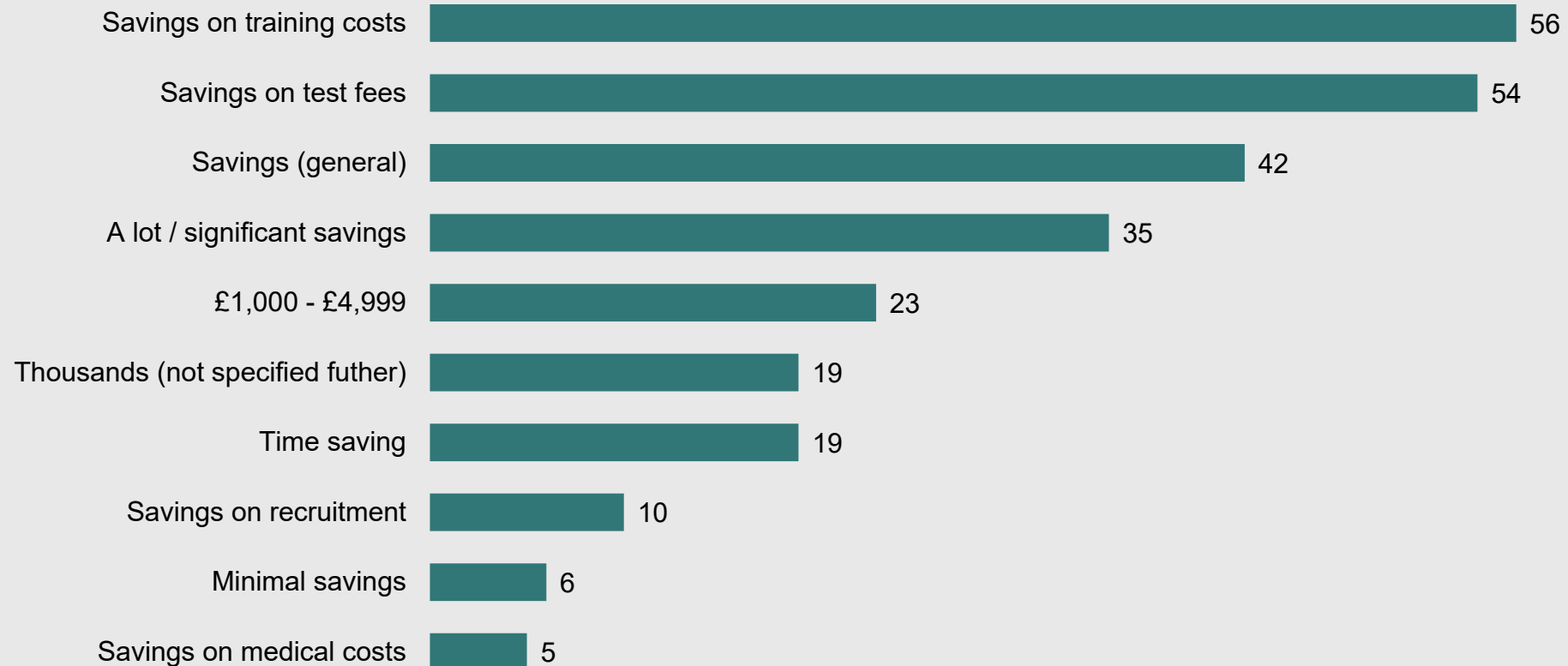
Q47: Do you agree that entitlement should be changed to allow persons with category C entitlement to drive PCVs on their HGV licence for maintenance and repair purposes?



Base: All consultees who answered the question (2,028)

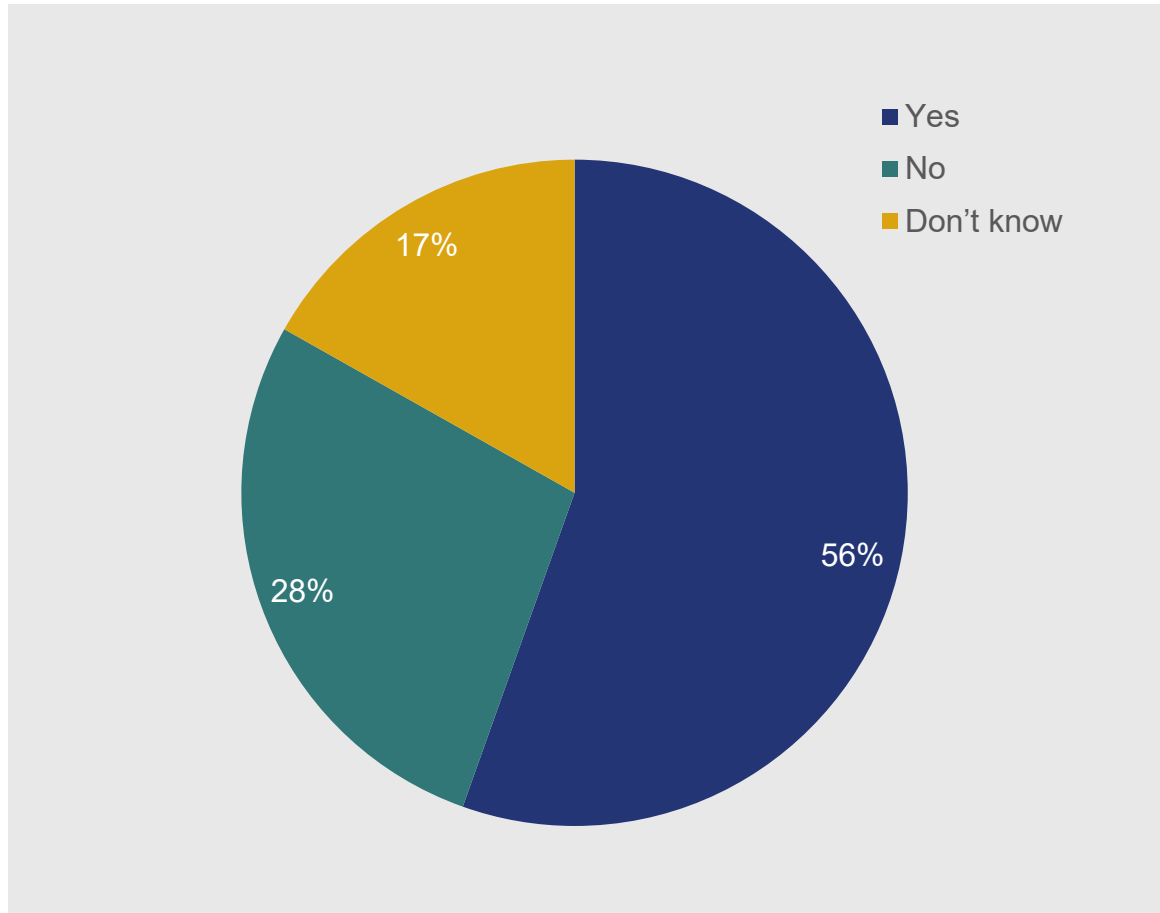
Other licensing changes - comments

Estimated costs or saving if entitlement was changed to allow persons with category C entitlement to drive PCVs on their HGV licence for maintenance and repair purposes



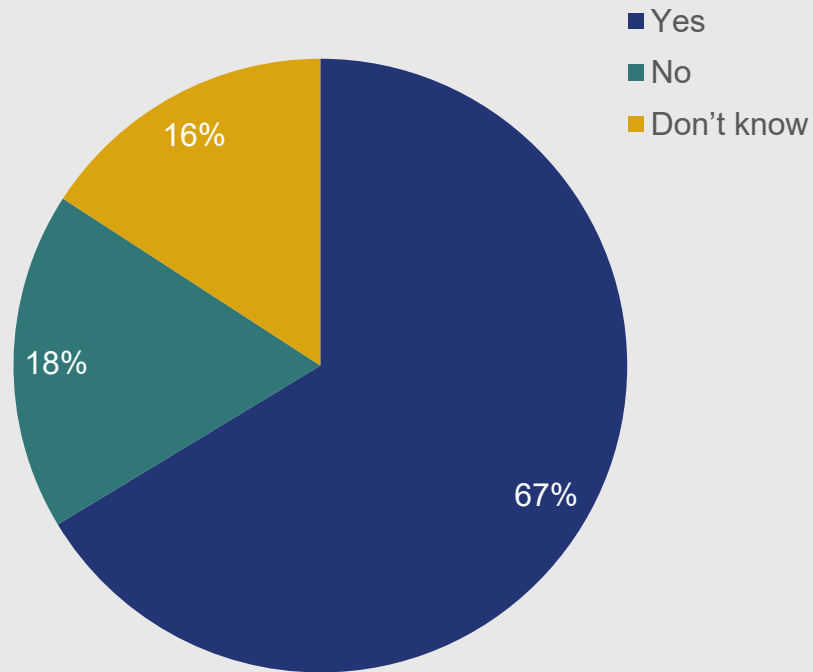
Base: All who provided comments on specific purposes they felt were subject to DCPC exemptions in question 48 (215 consultees)

Q50a: Do you agree that the D1E entitlement should be granted to those drivers who hold? C1 licences without taking an additional test



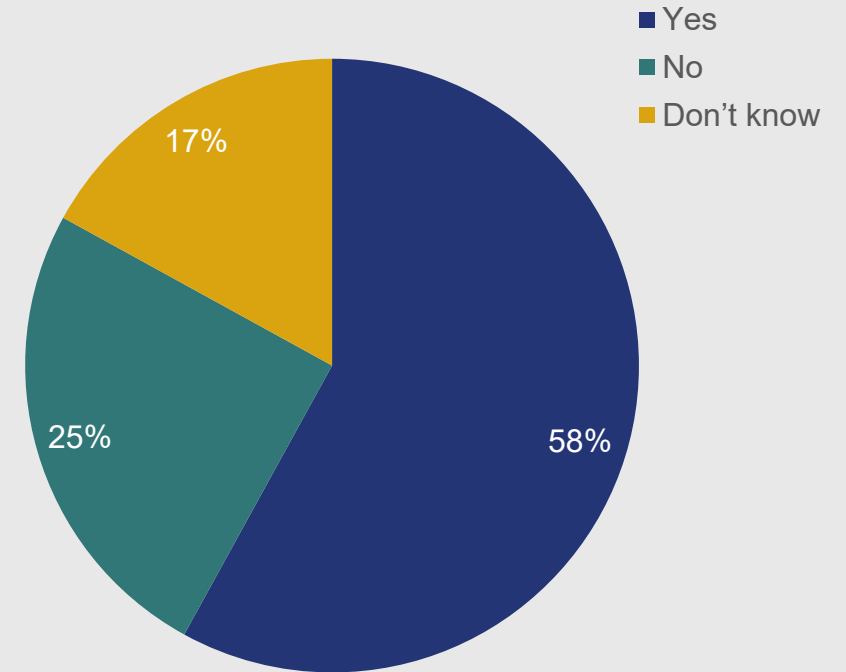
Base: All consultees who answered the question (1,959)

Q50b: Do you agree that the D1E entitlement should be granted to those drivers who hold? C1E licences without taking an additional test



Base: All consultees who answered the question (1,990)

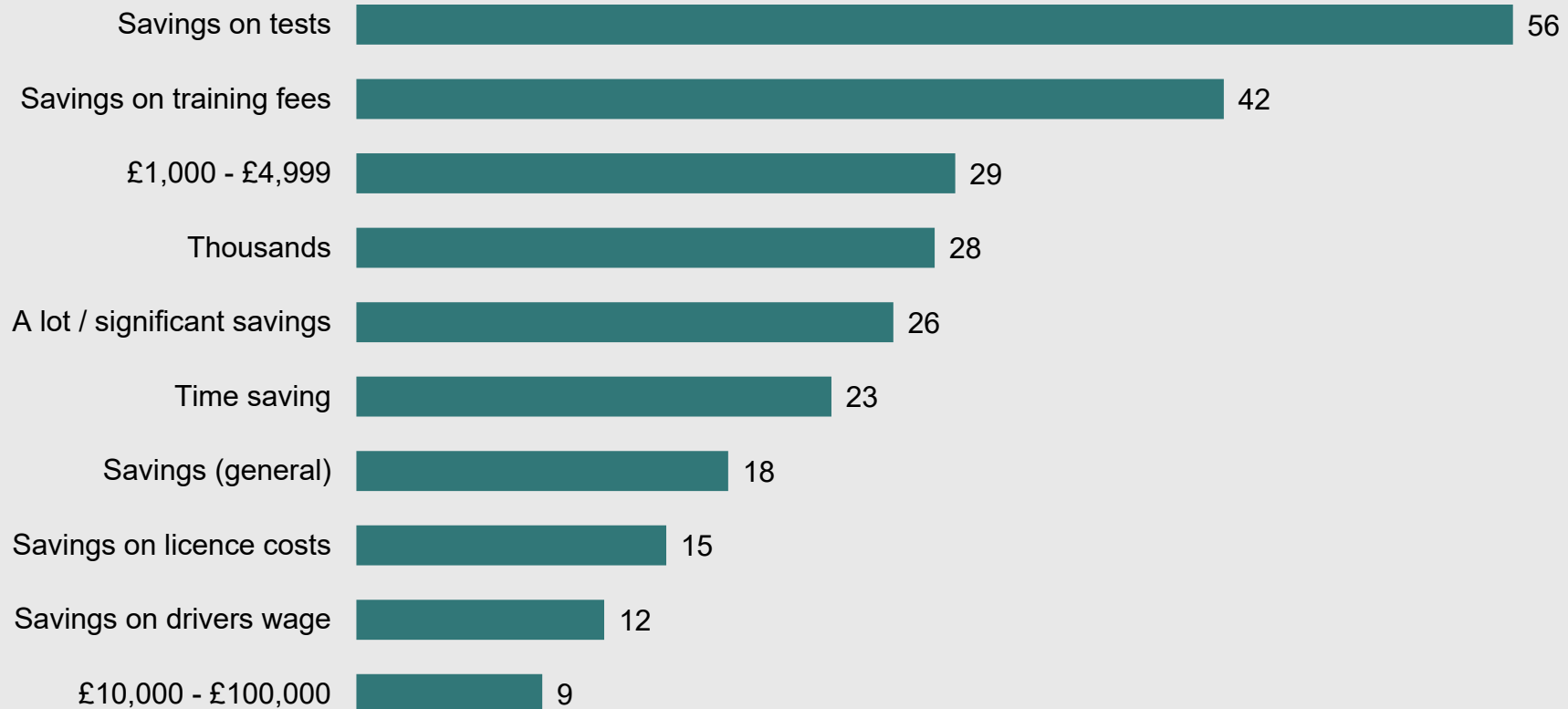
Q50c: Do you agree that the D1E entitlement should be granted to those drivers who hold? D1 licences without taking an additional test



Base: All consultees who answered the question (1,991)

Other licensing changes - comments

Estimated costs or savings to consultees or their business if the D1E entitlement was permitted



Base: All who provided comments on the estimated costs or savings to them or their business if the D1E entitlement was permitted at question 51 (225 consultees)

L category

Dependency of the L category entitlement

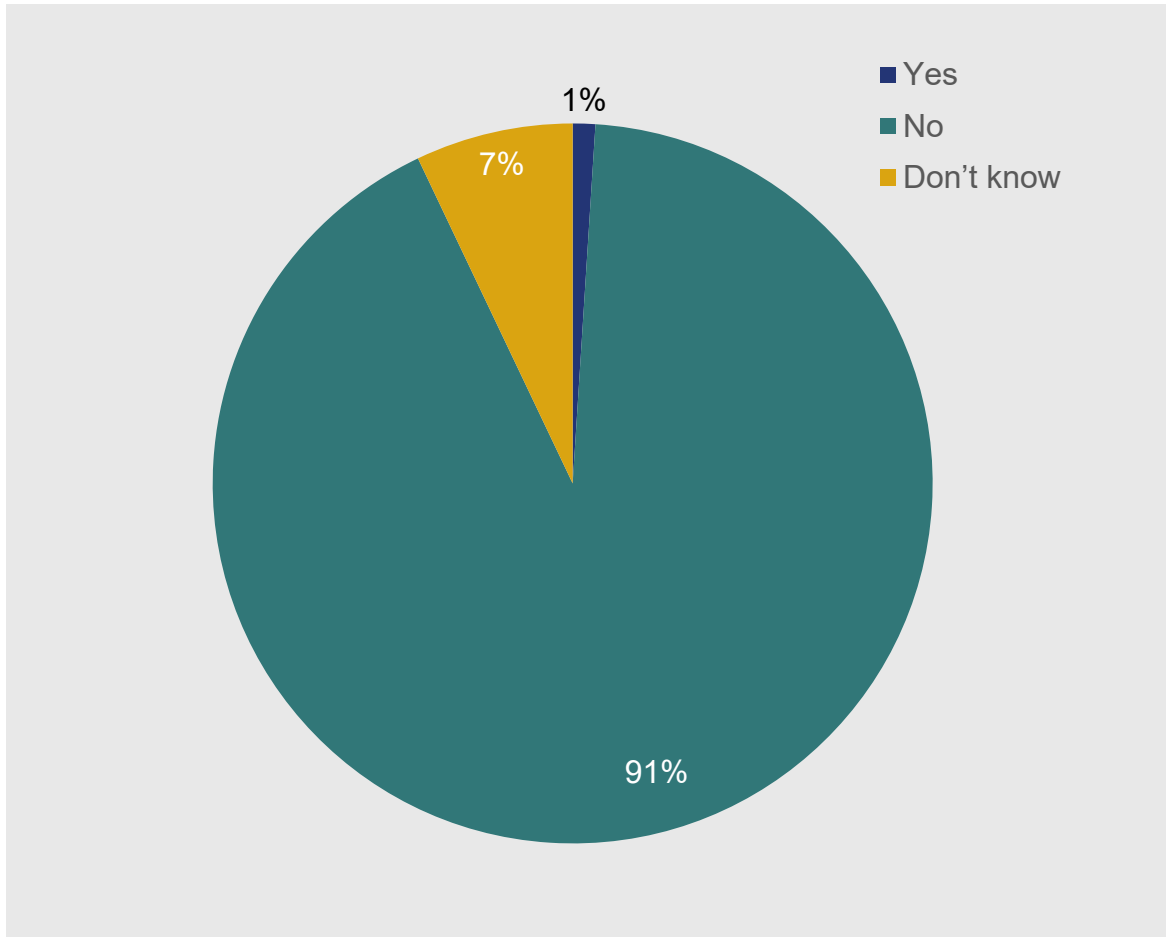
Category L is a defunct category of driving licence which allowed a driver to drive any electric vehicle original used when the only electric vehicles on the road were:

- Milk floats
- Vans operated by the old gas and electricity boards.

With electric HGVs and buses entering the market, DfT are researching if it is time to end Category L.

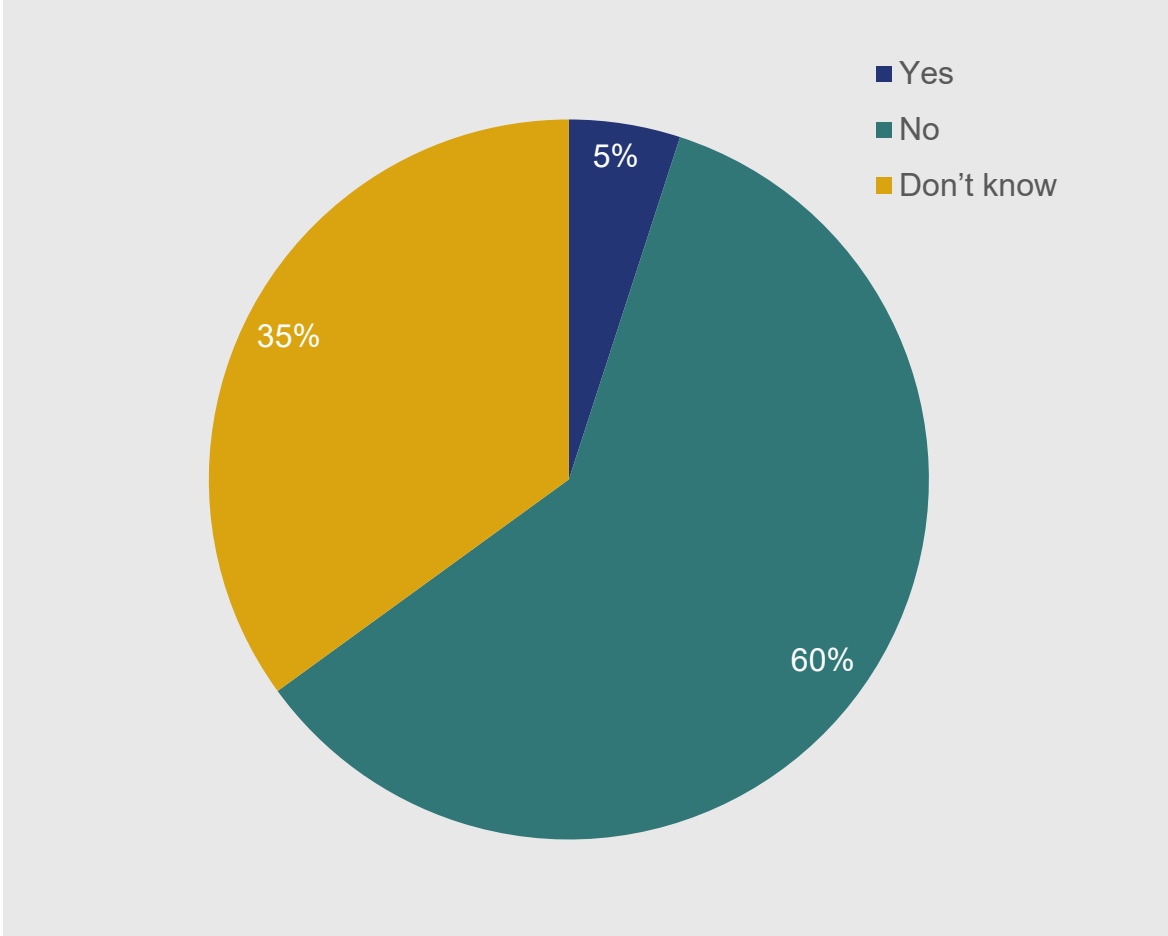
Of 2,013 consultees who answered the question, just 29 indicated that they were dependent on Category L entitlement.

Q53: Are you dependent on the category L entitlement?



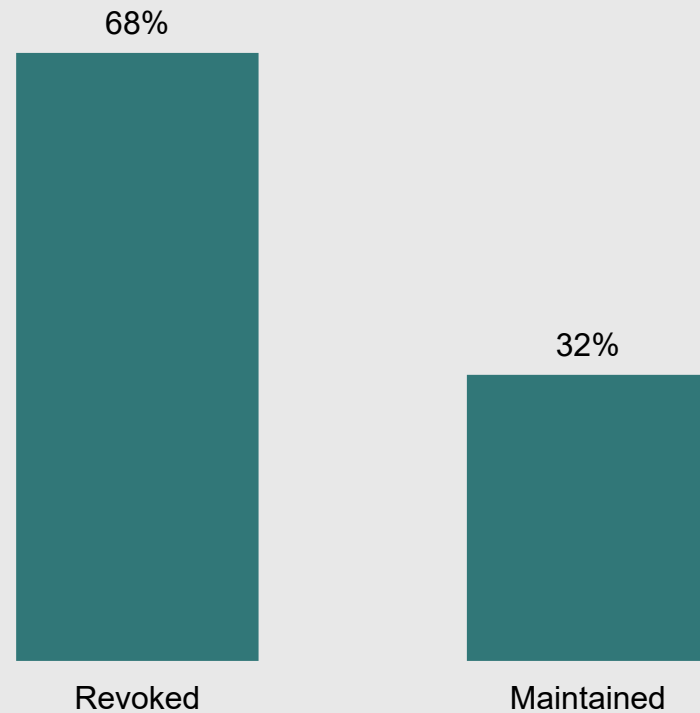
Base: All consultees who answered the question (2,013)

Q56: In your view are there any road safety impacts to revoking these L-category licences?



Base: All consultees who answered the question (1,963)

Q58: You believe the L category licence should be?



Base: All consultees who answered the question (1,669)

Agricultural vehicles

Consultees were asked if there should be changes to legislation to bring agricultural vehicles within the C category and also the CE category. Consultees were broadly split towards whether DfT should consider such changes as shown in the charts on the next slide.

Supportive comments

There were 489 consultees who provided comments in support of bringing changes to legislation to bring agricultural vehicles within the C and/or CE category. The main comments received were that agricultural vehicles are large/heavy vehicles and as such better suited to C or CE categories (257), for road safety reasons (119) and that it would mean drivers would be trained in usage of such vehicles on the public highway (94) with resultant improvements in driving standards.

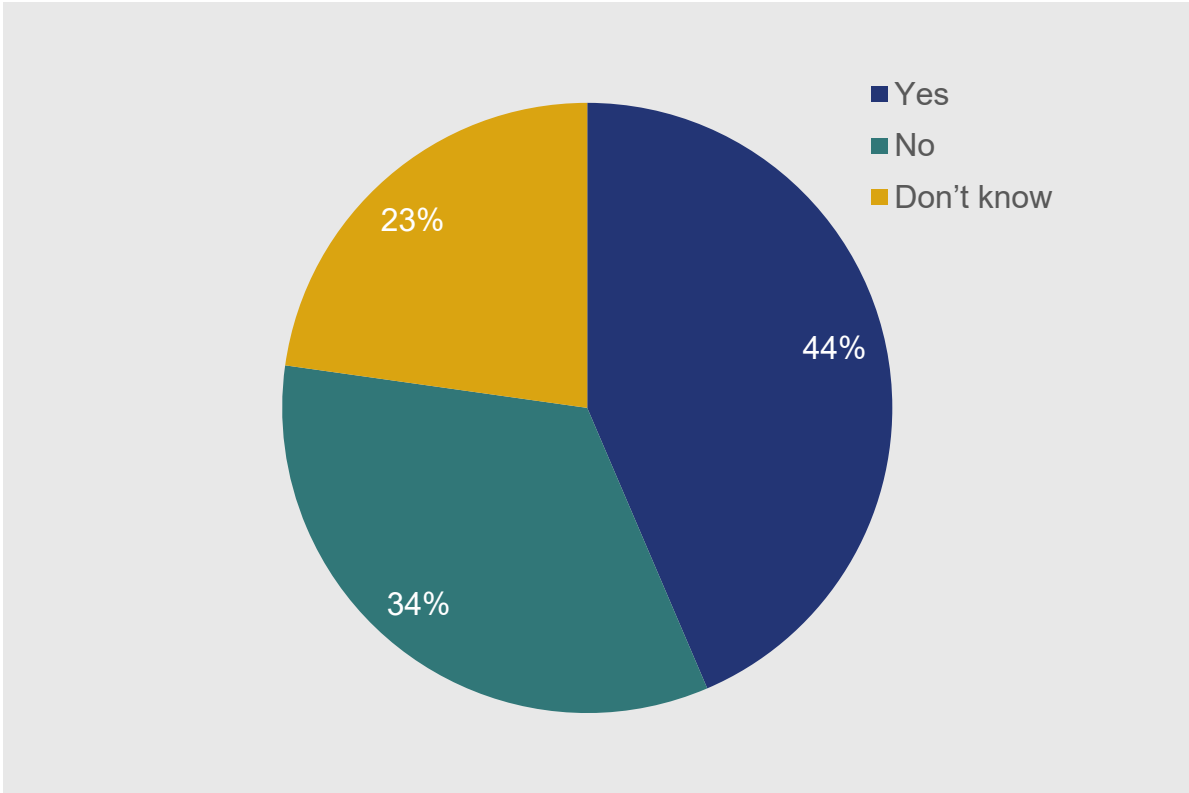
“This change will bring drivers of agricultural vehicles in line with HGV drivers in that they will better understand the legal requirements of driving a larger vehicle and allow them to be held to a higher standard...”

Opposing comments

On the other hand, there were 318 consultees who provided comments in opposition to the proposals. The most frequently cited comments were that there would be negative impacts on farmers (84) and/or on the farming industry (62) and that it could be expensive (44).

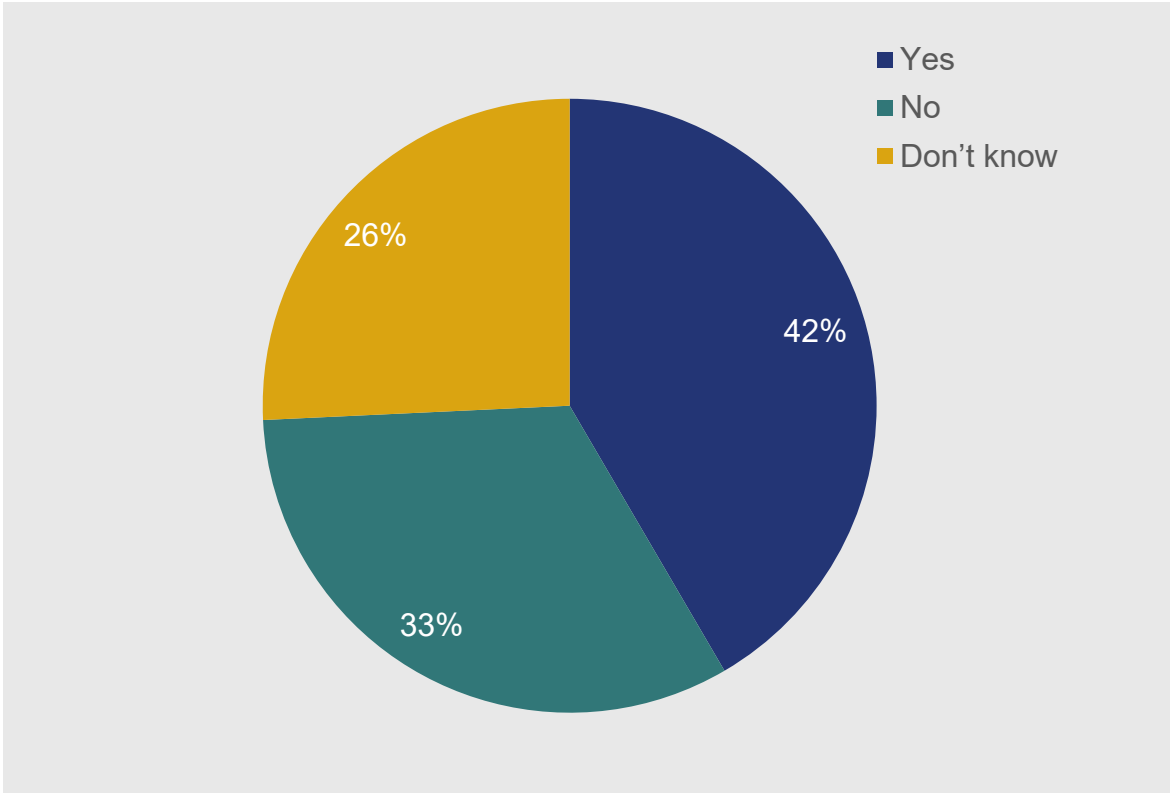
“...significant extra costs...farms are family run and already suffering financially, the added stress, cost and waiting time to take a C/CE test would have huge impacts.”

Q59a: In your view should we consider changes to legislation to bring agricultural vehicles within the C category?



Base: All consultees who answered the question (1,954)

Q59b: In your view should we consider changes to legislation to bring agricultural vehicles within the CE category?



Base: All consultees who answered the question (1,932)

Driving regulations and other issues

Review of the 2021 driving regulations

Part of the call for evidence involved a review of the 2012 driving regulations. Consultees were asked to supply evidence or comments with regard to these regulations. There were 46 consultees who made comments or supplied evidence. The main comments received were concerns about the safety of tractors on public highways (9), including concerns about young tractor drivers (8). There were also eight comments about the regulations being too strict and six comments that the regulations were in need of review.

“Without guidelines it is not possible to comment other than, if the current rules are 10 years old, more regular reviews are needed.”

“I see 16 year olds tipping tractors over and causing road safety problems in the area I live in.”

Other driving licence issues

Consultees were also asked to comment on what, if any, other driving licence issues they thought should be explored for improvement. In total, 675 consultees provided comments including:

- Other licensing entitlements including giving Category C holders Category D entitlement and vice versa
- Making improvements to Category B, C, D and F licensing
- Training

Minibus service provision

Minibus service provision

Should D1 entitlement be given to people at the same time as they pass their car (category B) test?

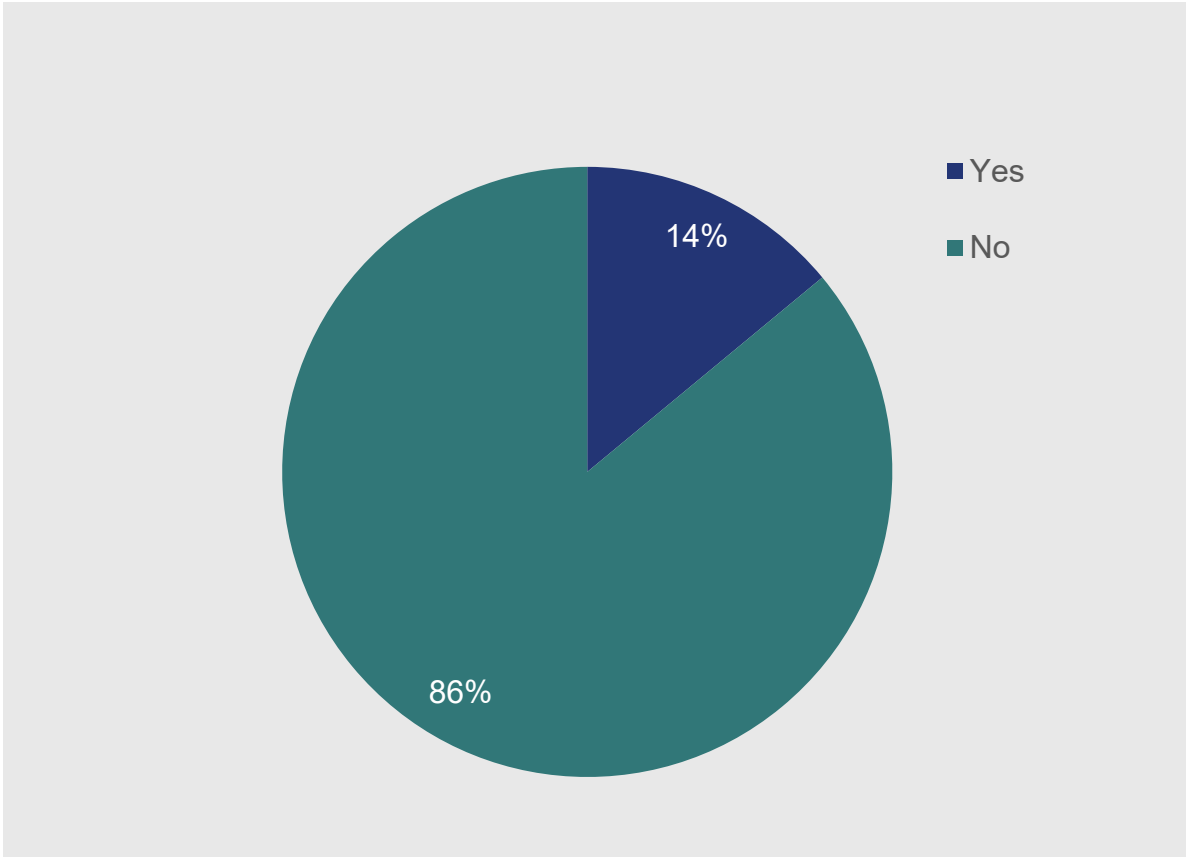
All consultees were asked if they provide minibus services. Of 2,016 consultees who answered the question, around one in seven (286 consultees) said that they did this. These consultees were then asked if they wished to answer questions about minibuses of which 215 said yes*.

The next slides provide a number of metrics about minibuses for those who have these including:

- **Number of minibuses**
- **How many permits and operator licences held and how many drivers utilise them to provide transport services**
- **Percentage of organisation's journeys operated using a Section 19, Section 22 and PSV operator licence**
- **Whether currently offer services and/or want to offer services within a number of areas including community transport, home to school and educational services and demand responsive transport.**
- **Average annual mileage**
- **Whether offer minibus services in urban, rural or both areas**
- **Number, age and status of volunteer and paid drivers**
- **Minibus Driver Awareness Scheme (MiDAS)**
- **Number of services run per month and ability to meet demand**
- **Cancelling services / driver shortages / safety**

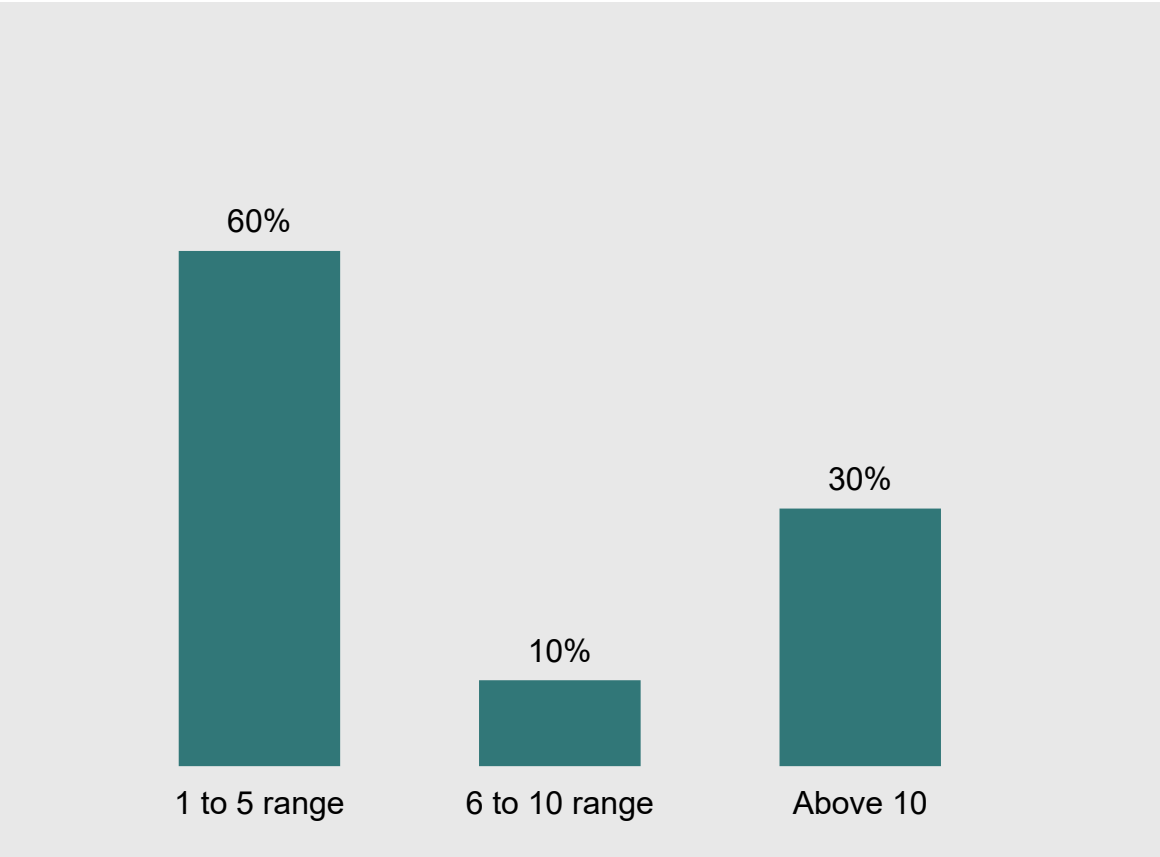
*A small number of consultees said they did not run minibus services but wished to provide comments at one or more questions about minibus service provision. These consultees are also included in this section of the report if/where they answered the questions.

Q62: Do you provide minibus services?



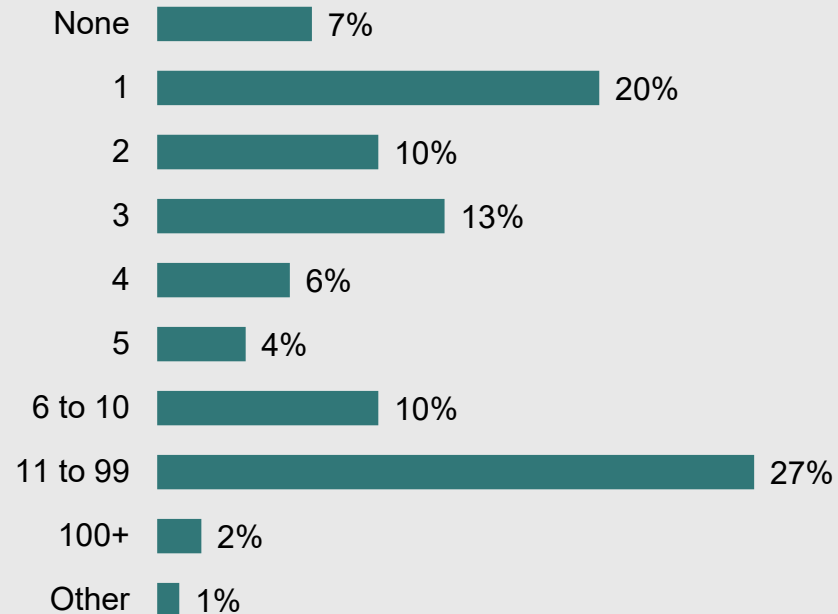
Base: All consultees who answered the question (2,016)

Q64: How many minibuses do you use to provide passenger transport services?



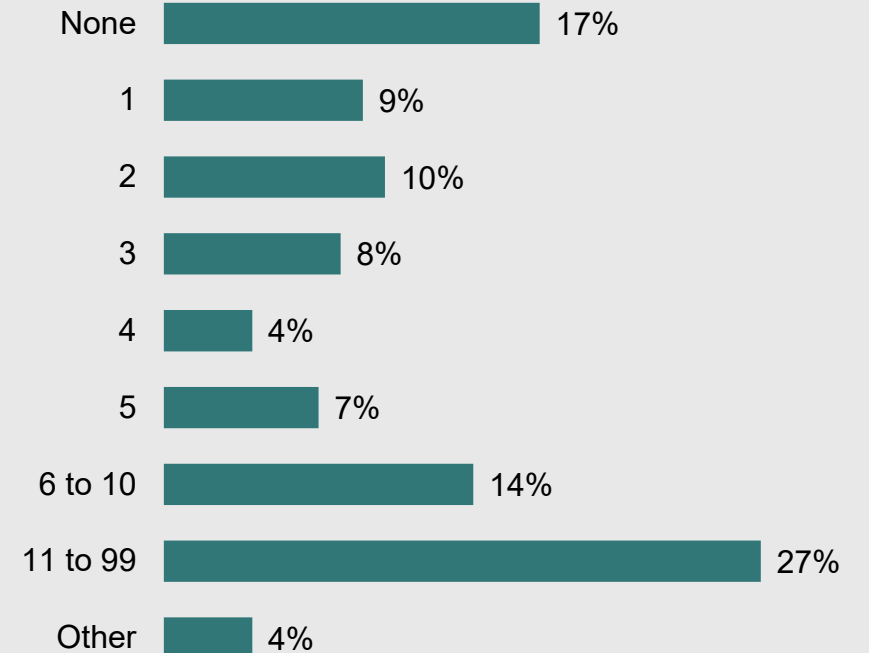
Base: All who provide minibus services (205)

Q65.1.1: How many section 19 permits do you have?



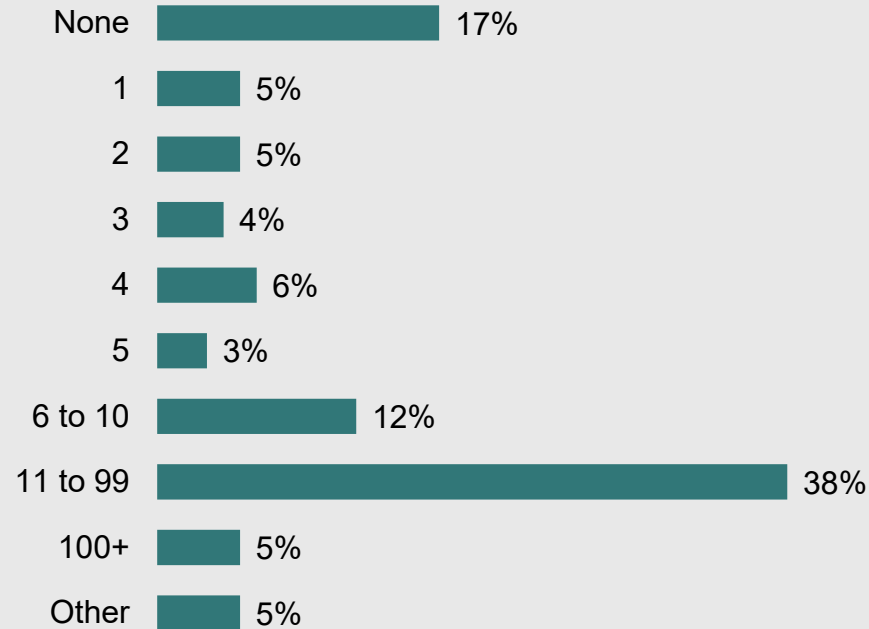
Base: All who provide minibus services (165)

Q65.1.2: How many drivers using a D1 licence do you have operating services on a section 19 permit?



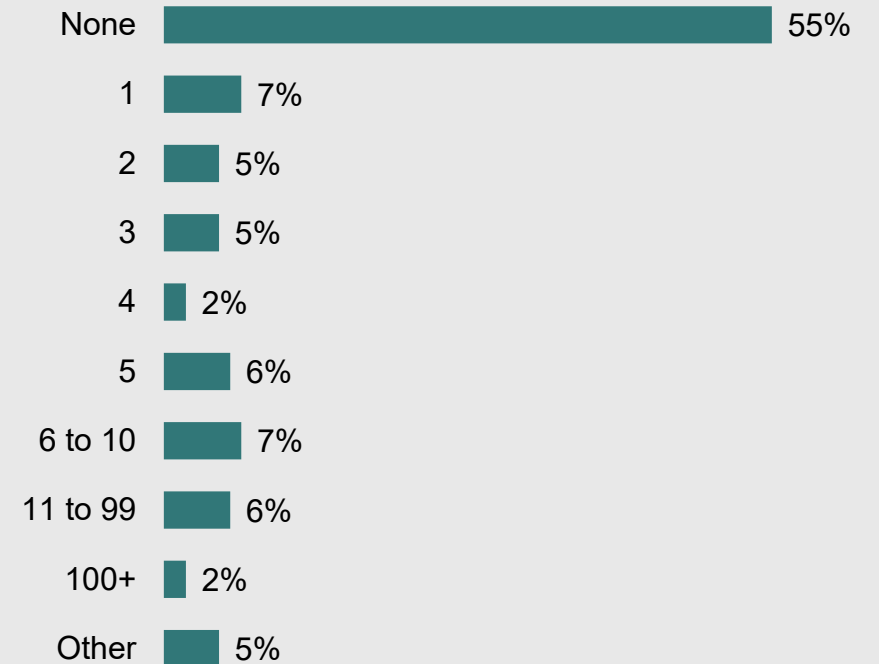
Base: All who provide minibus services (136)

Q65.1.3: How many drivers using a D1(101) licence do you have operating services on a section 19 permit?



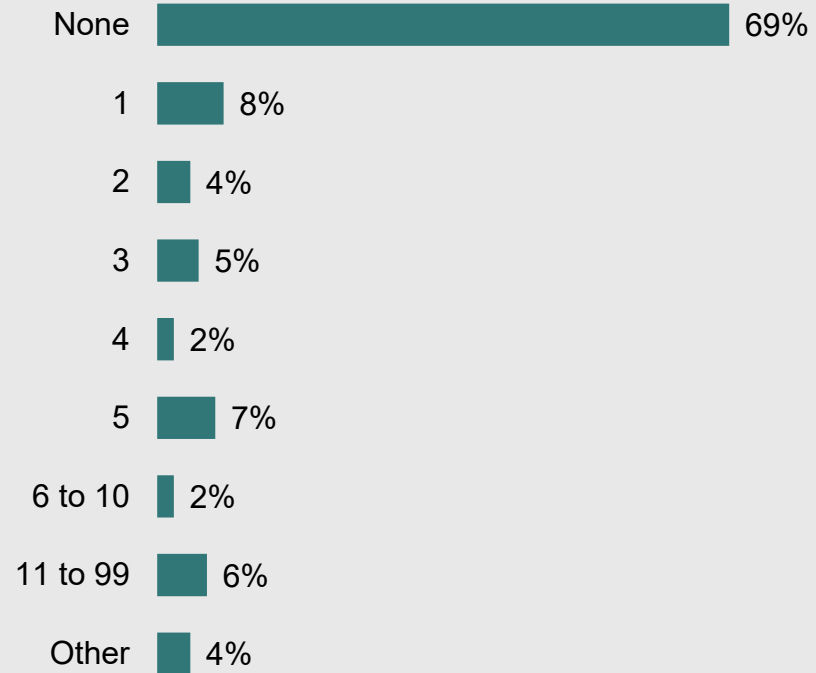
Base: All who provide minibus services (121)

Q65.1.4: How many drivers using a B licence do you have operating services on a section 19 permit?



Base: All who provide minibus services (108)

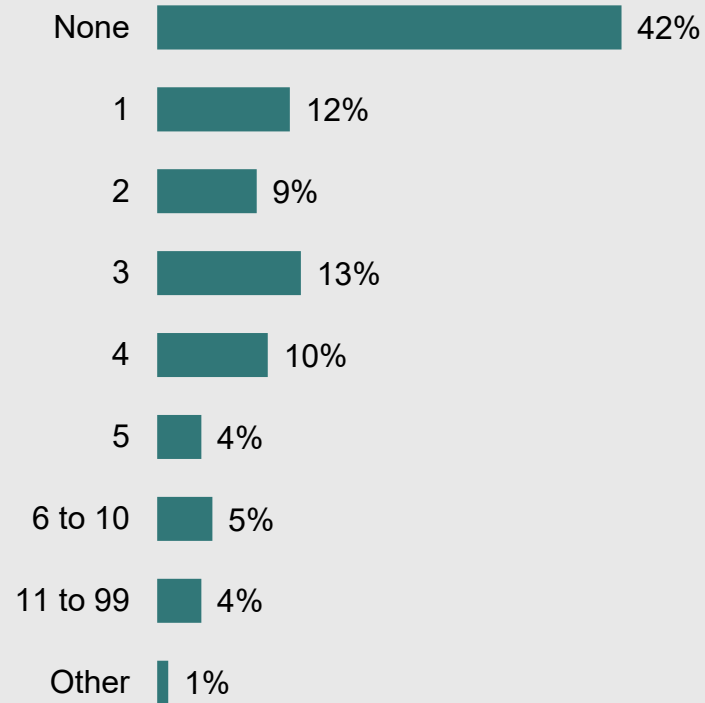
Q65.1.5: How many drivers using a D licence do you have operating services on a section 19 permit?



Base: All who provide minibus services (89*)

*Small base size

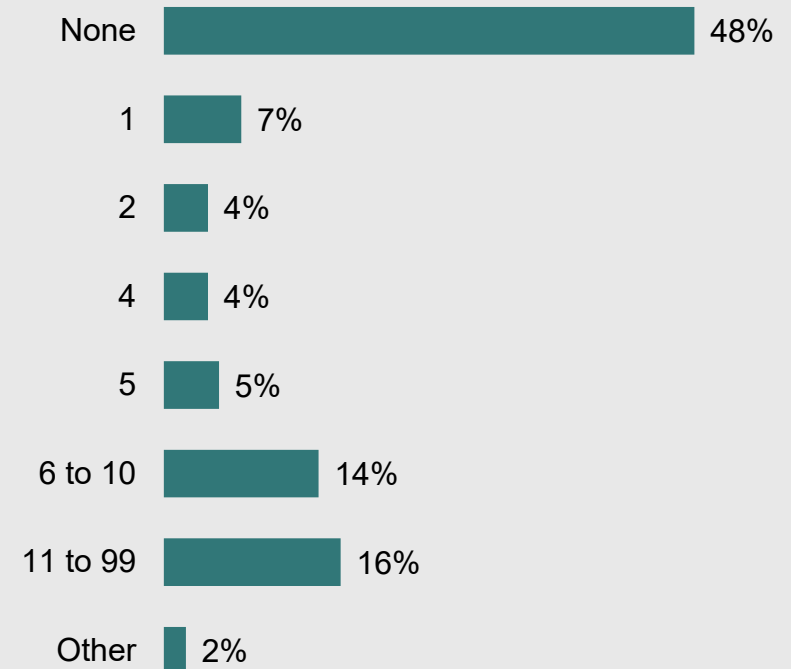
Q65.2.1: How many section 22 permits do you have?



Base: All who provide minibus services (77*)

*Small base size

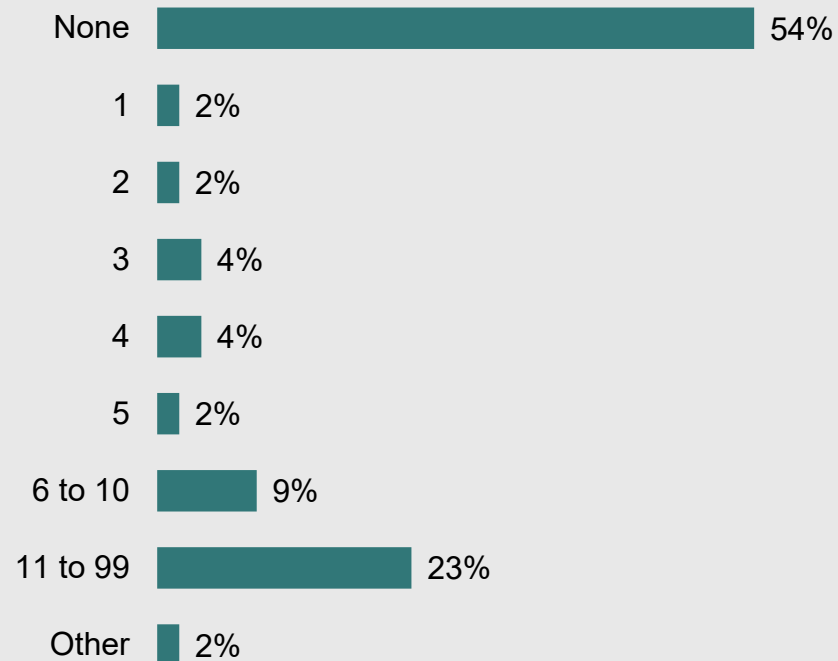
Q65.2.2: How many drivers using a D1 licence do you have operating services on a section 22 permit?



Base: All who provide minibus services (56*)

*Small base size

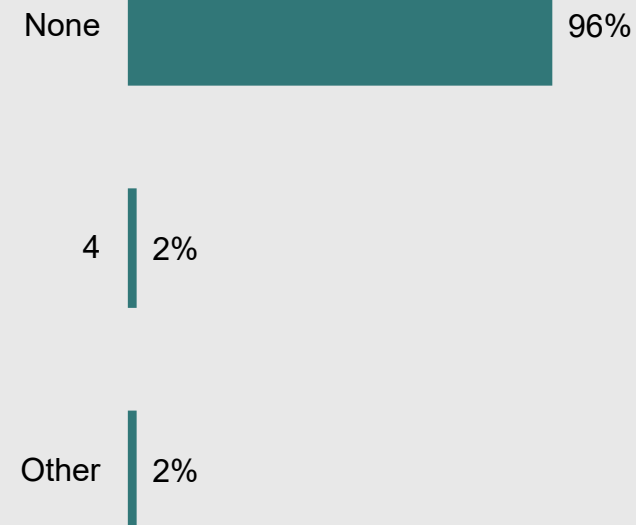
Q65.2.3: How many drivers using a D1(101) licence do you have operating services on a section 22 permit?



Base: All who provide minibus services (56*)

*Small base size

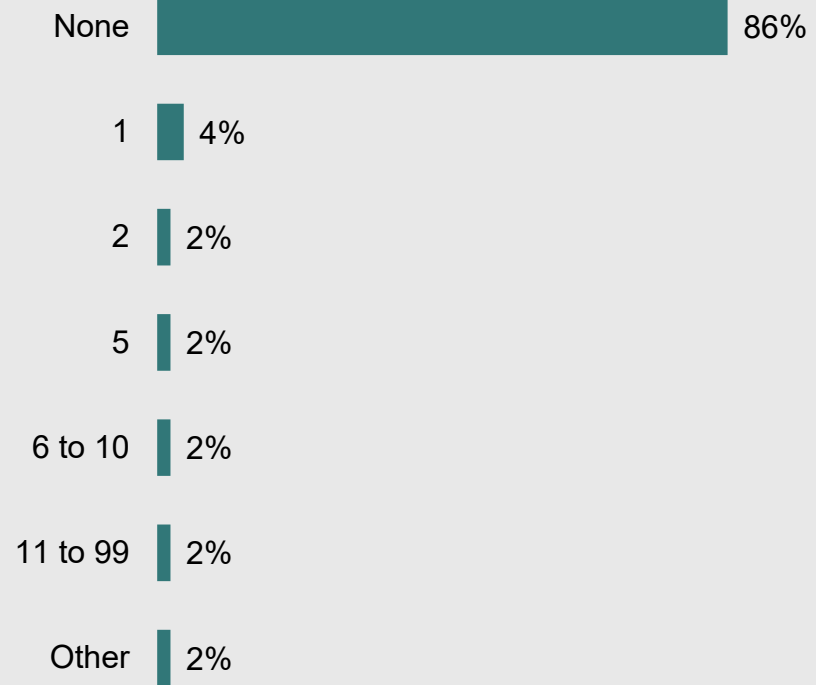
Q65.2.4: How many drivers using a B licence do you have operating services on a section 22 permit?



Base: All who provide minibus services (47*)

*Small base size

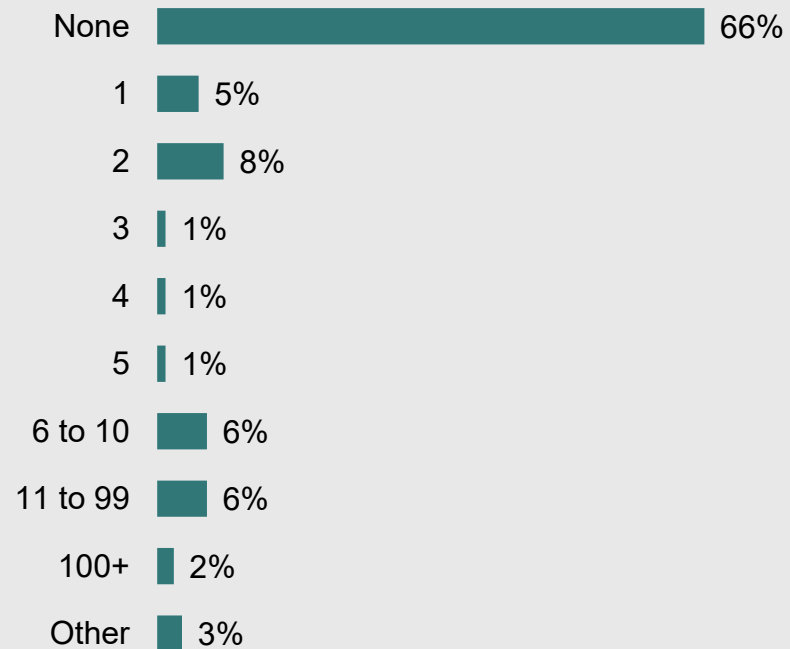
Q65.2.5: How many drivers using a D licence do you have operating services on a section 22 permit?



Base: All who provide minibus services (49*)

*Small base size

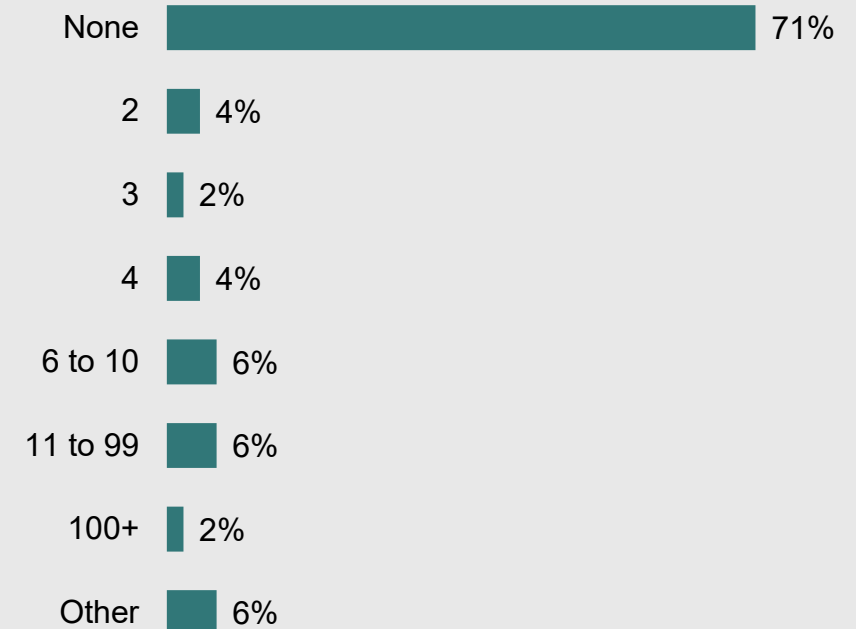
Q65.3.1: How many PSV operator licences do you have?



Base: All who provide minibus services (65*)

*Small base size

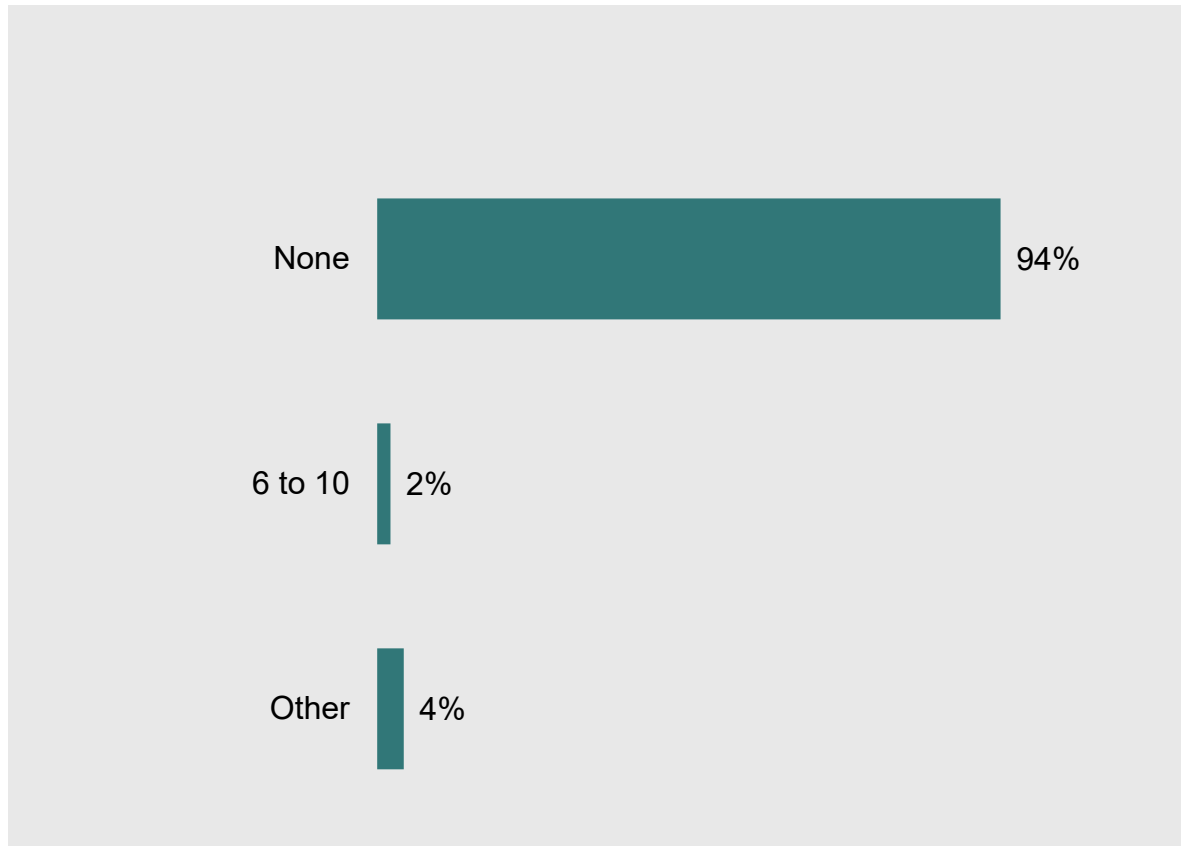
Q65.3.2: How many drivers using a D1 licence do you have operating services on a PSV operator licence?



Base: All who provide minibus services (52*)

*Small base size

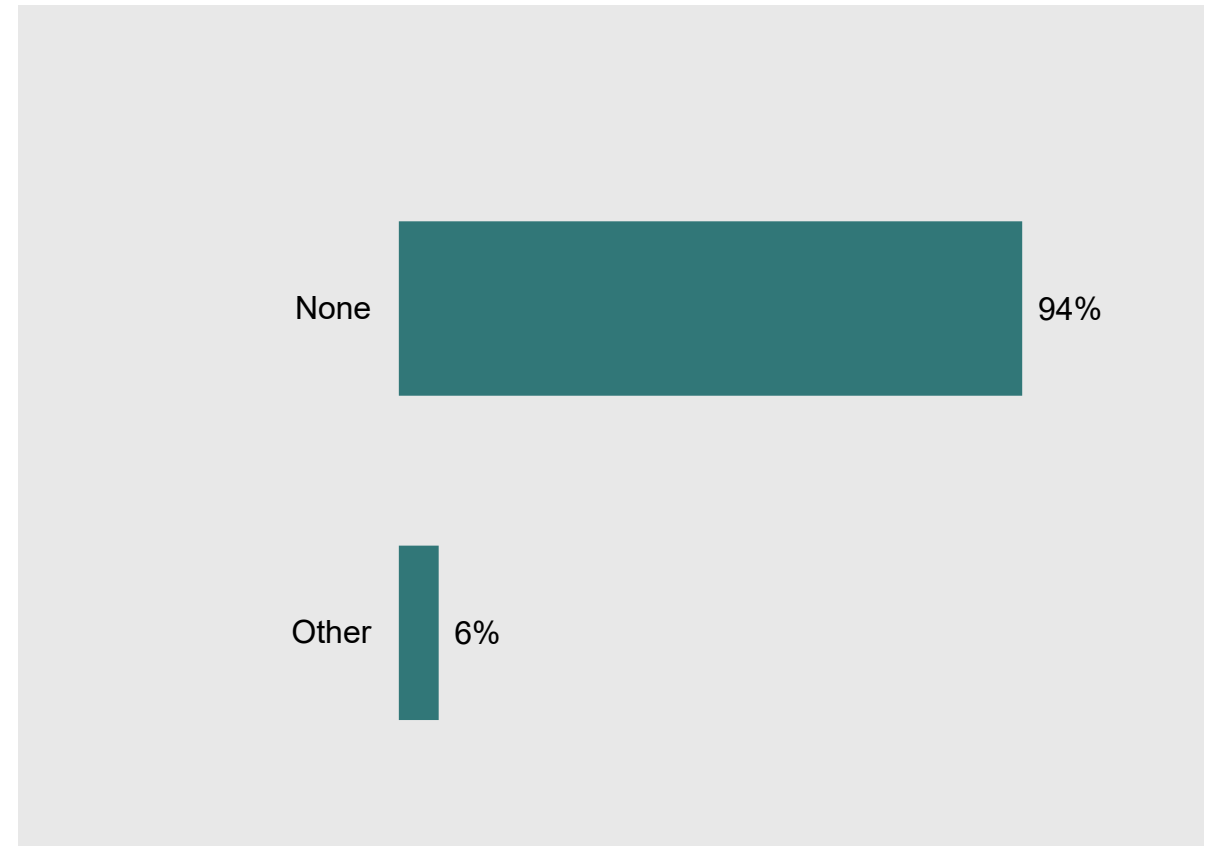
Q65.3.3: How many drivers using a D1(101) licence do you have operating services on a PSV operator licence?



Base: All who provide minibus services (47*)

*Small base size

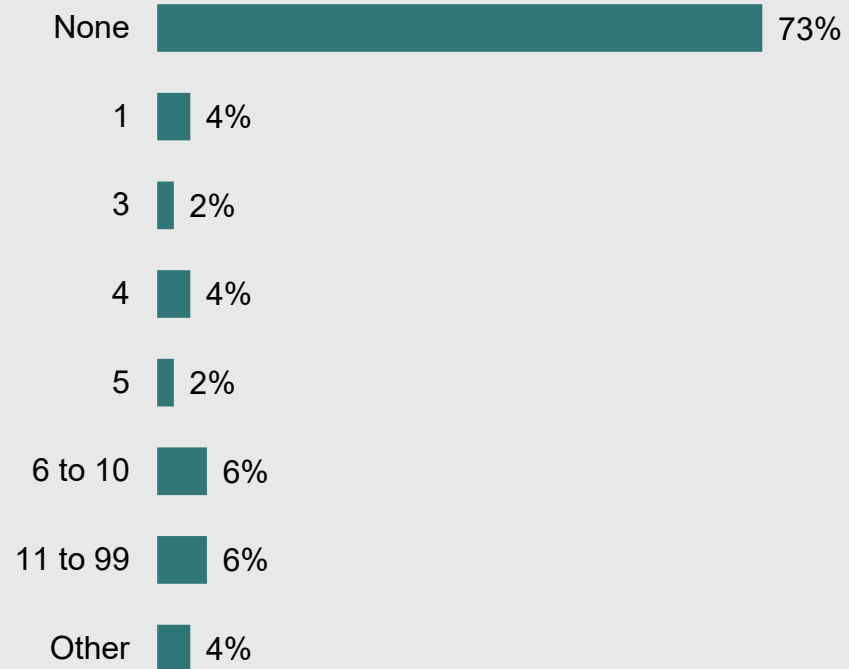
Q65.3.4: How many drivers using a B licence do you have operating services on a PSV operator licence?



Base: All who provide minibus services (50*)

*Small base size

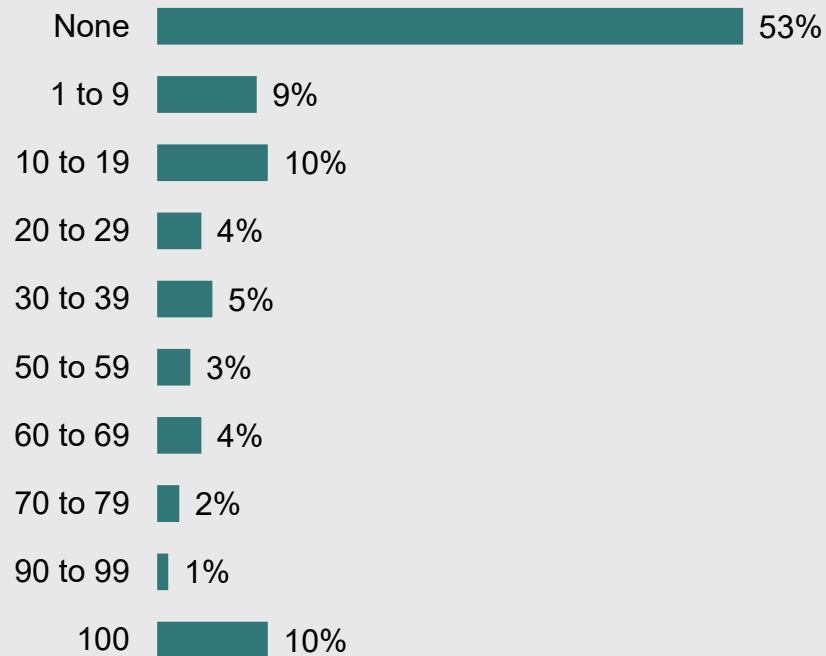
Q65.3.5: How many drivers using a D licence do you have operating services on a PSV operator licence?



Base: All who provide minibus services (52*)

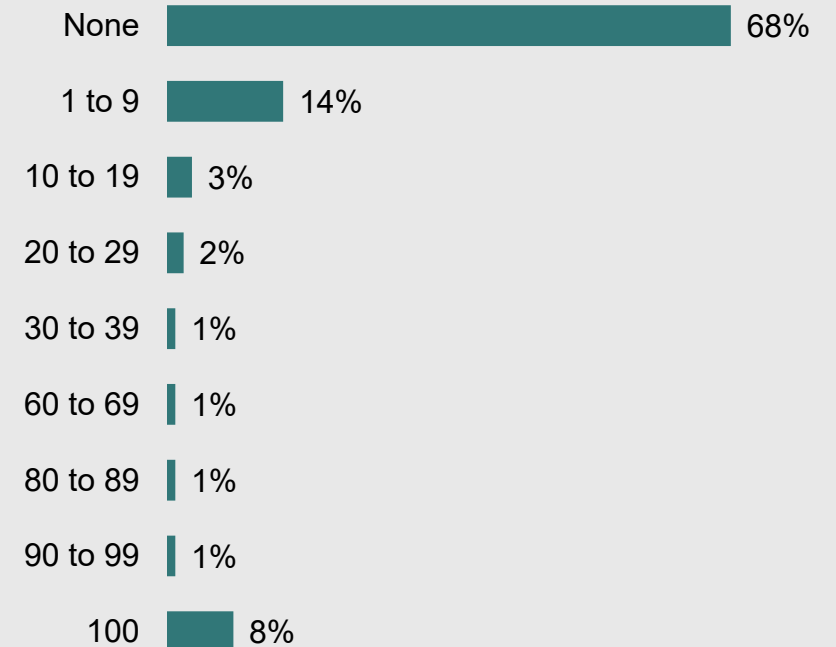
*Small base size

Q66.1.1: What percentage of your organisation's journeys do you operate using a section 19 permit on a B licence?



Base: All who provide minibus services (105)

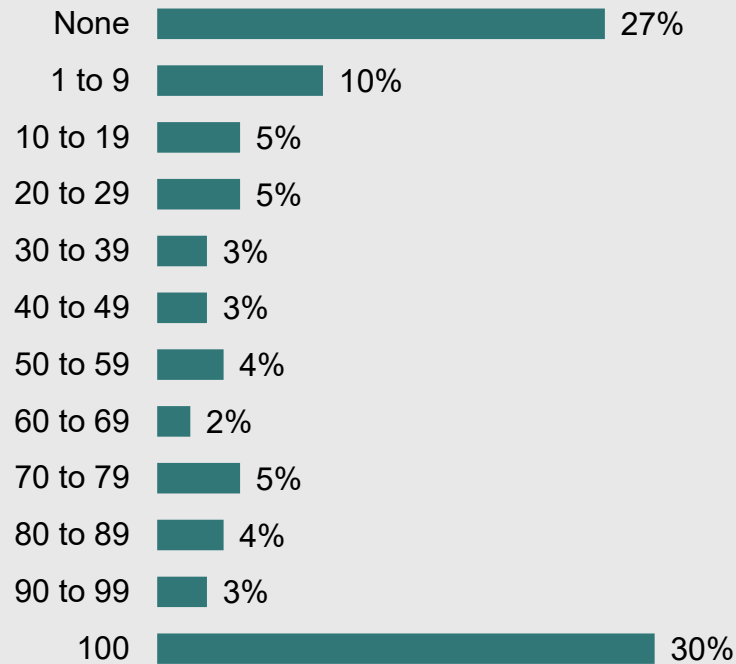
Q66.1.2: What percentage of your organisation's journeys do you operate using a section 19 permit on a D licence?



Base: All who provide minibus services (87*)

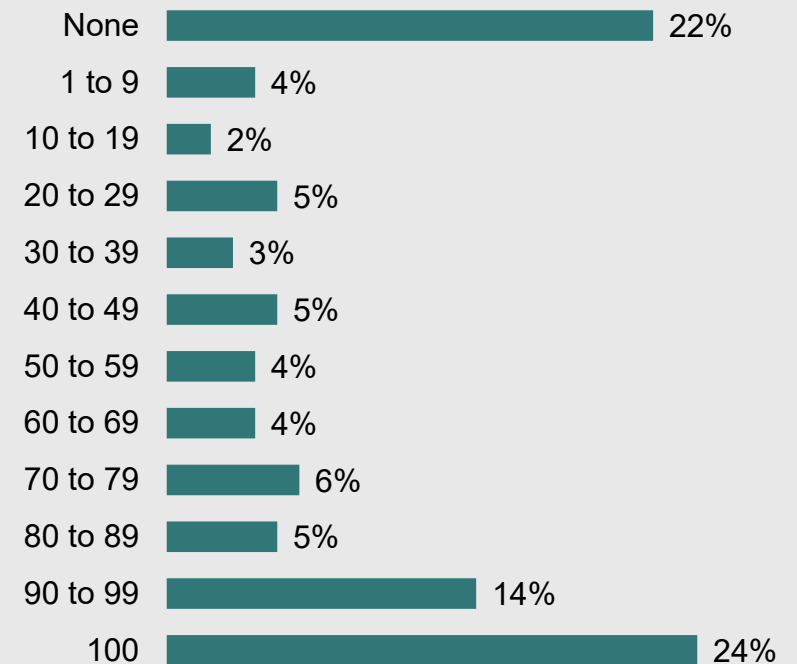
*Small base size

Q66.1.3: What percentage of your organisation's journeys do you operate using a section 19 permit on a D1 licence?



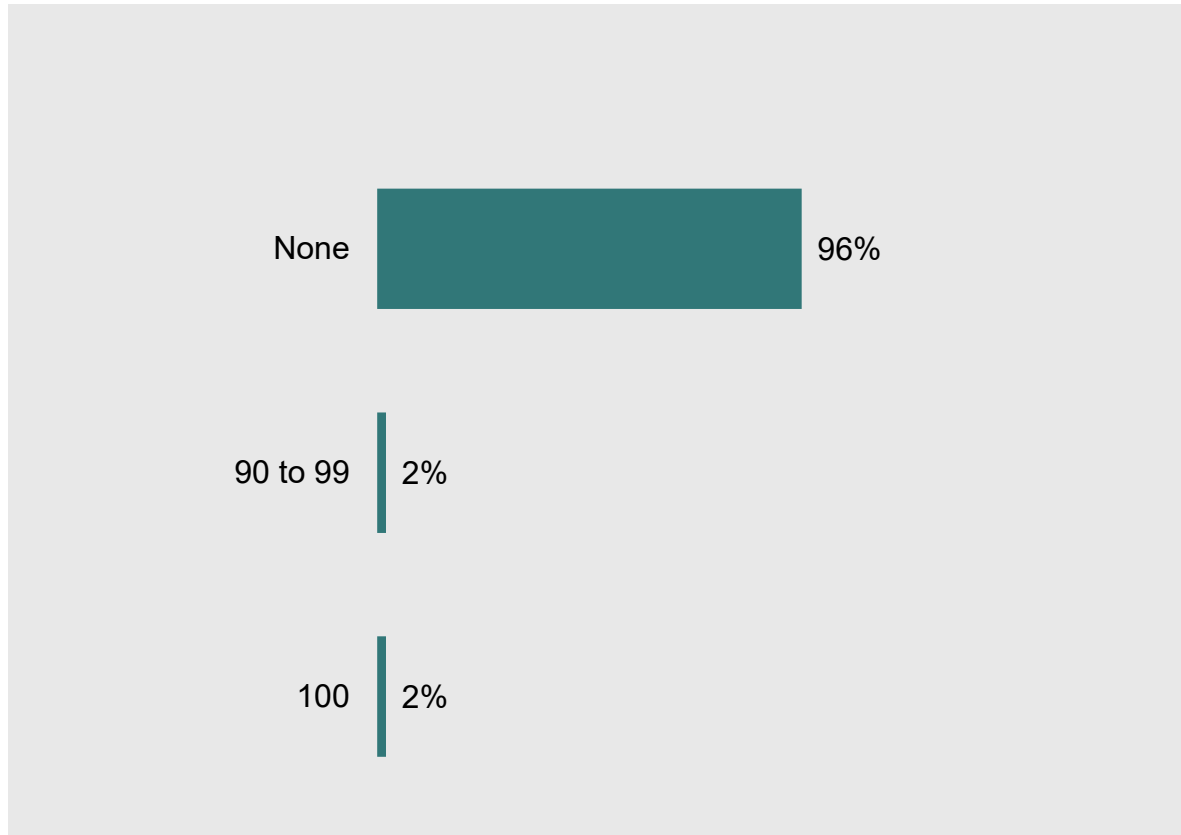
Base: All who provide minibus services (128)

Q66.1.4: What percentage of your organisation's journeys do you operate using a section 19 permit on a D1(101) licence?



Base: All who provide minibus services (116)

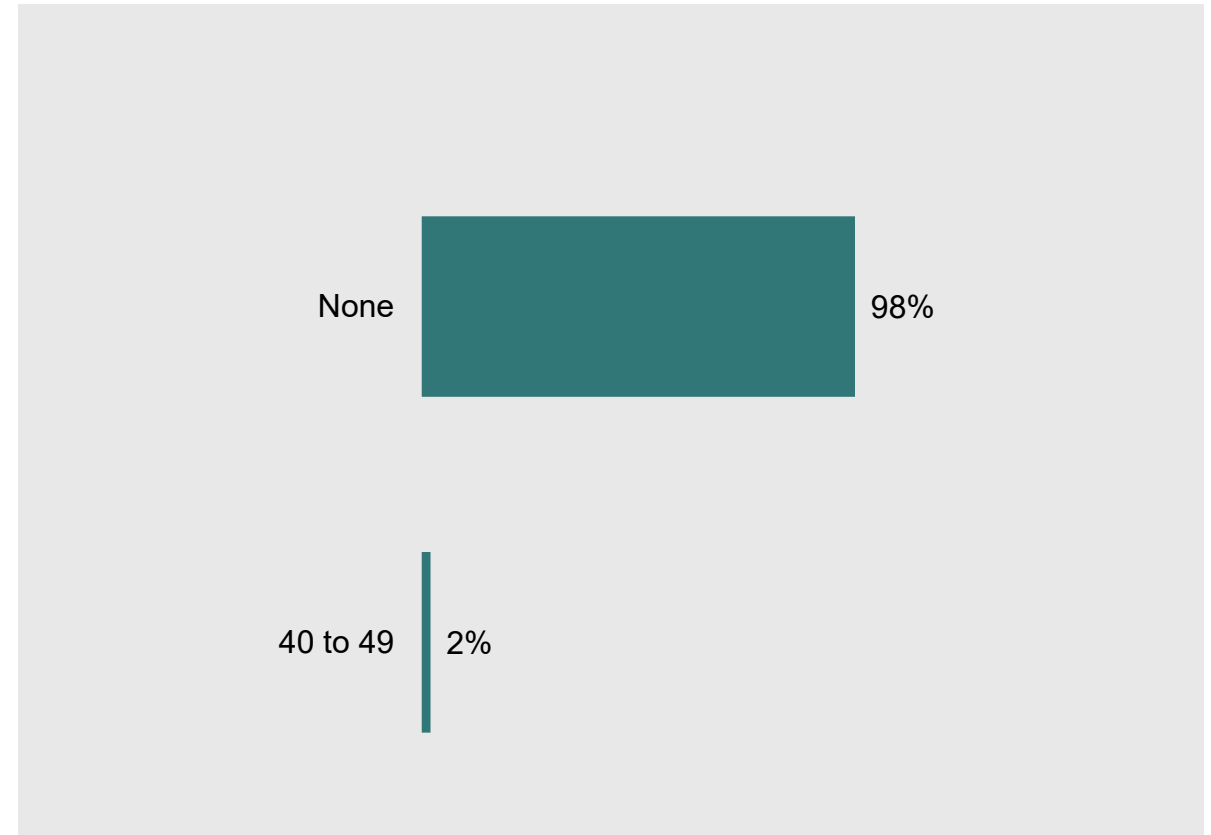
Q66.2.1: What percentage of your organisation's journeys do you operate using a section 22 permit on a B licence?



Base: All who provide minibus services (53*)

*Small base size

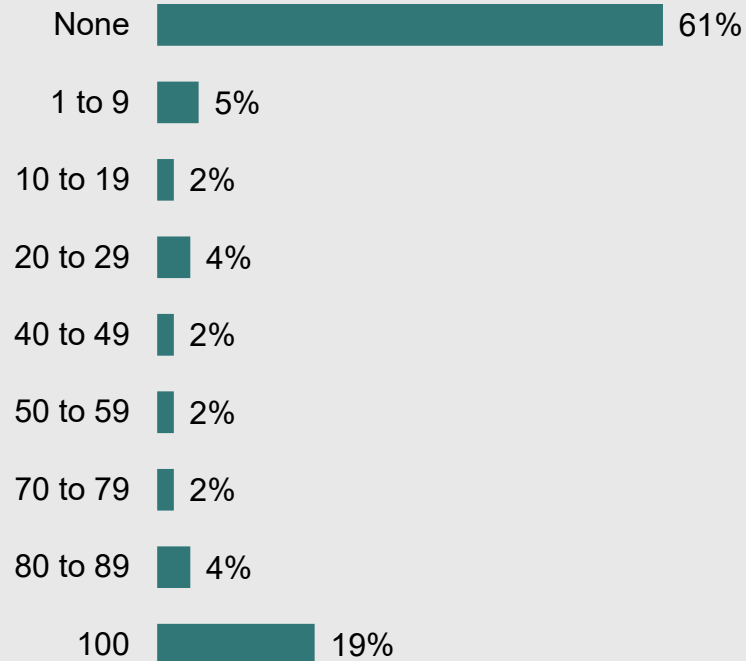
Q66.2.2: What percentage of your organisation's journeys do you operate using a section 22 permit on a D licence?



Base: All who provide minibus services (47*)

*Small base size

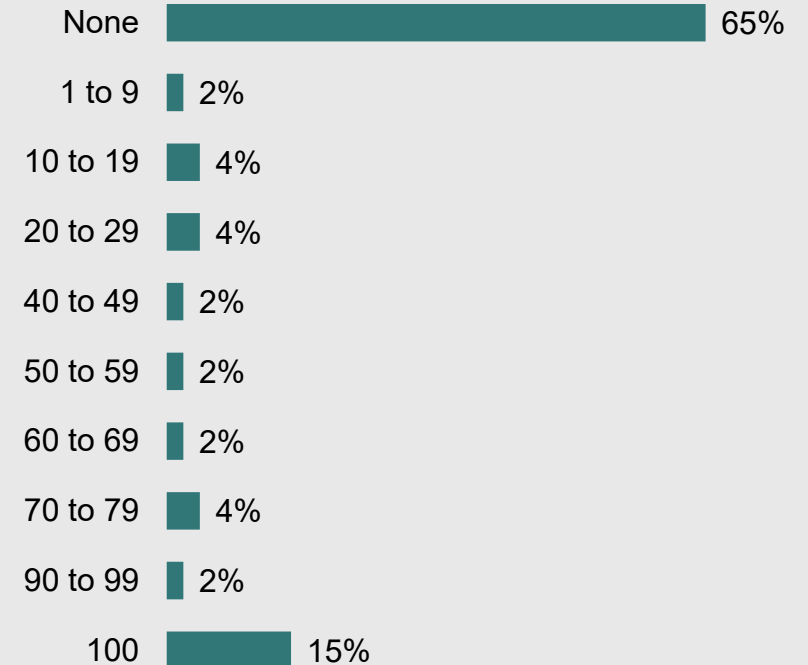
Q66.2.3: What percentage of your organisation's journeys do you operate using a section 22 permit on a D1 licence?



Base: All who provide minibus services (57*)

*Small base size

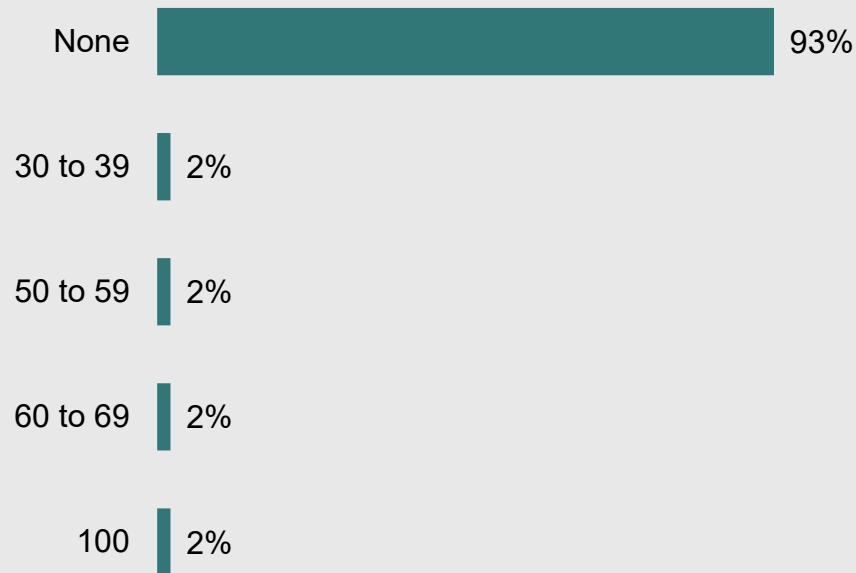
Q66.2.4: What percentage of your organisation's journeys do you operate using a section 22 permit on a D1(101) licence?



Base: All who provide minibus services (55*)

*Small base size

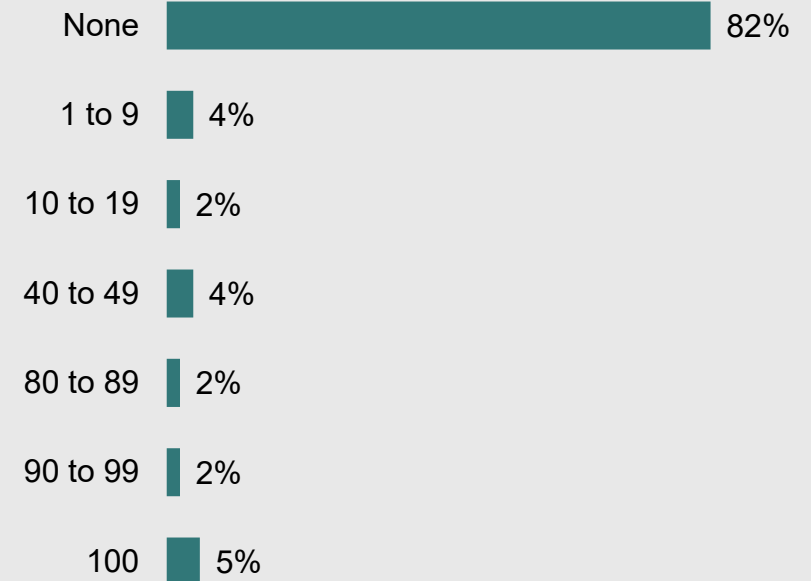
Q66.3.1: What percentage of your organisation's journeys do you operate using a PSV operator licence on a B driving licence?



Base: All who provide minibus services (60*)

*Small base size

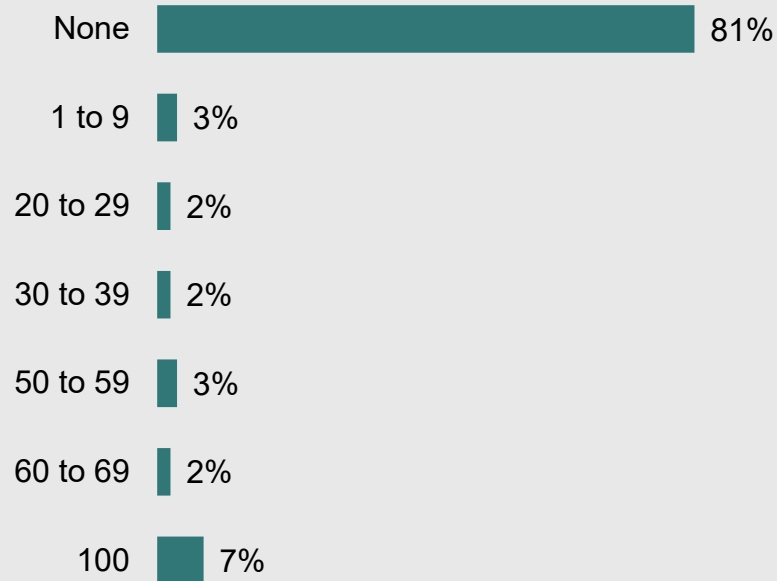
Q66.3.2: What percentage of your organisation's journeys do you operate using a PSV operator licence on a D driving licence?



Base: All who provide minibus services (57*)

*Small base size

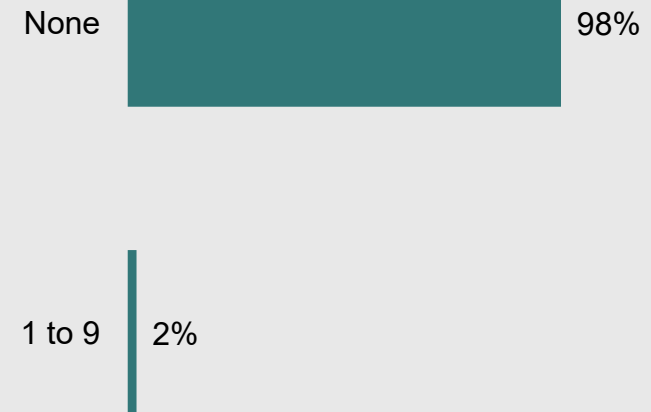
Q66.3.3: What percentage of your organisation's journeys do you operate using a PSV operator licence on a D1 driving licence?



Base: All who provide minibus services (58*)

*Small base size

Q66.3.4: What percentage of your organisation's journeys do you operate using a PSV operator licence on a D1(101) driving licence?

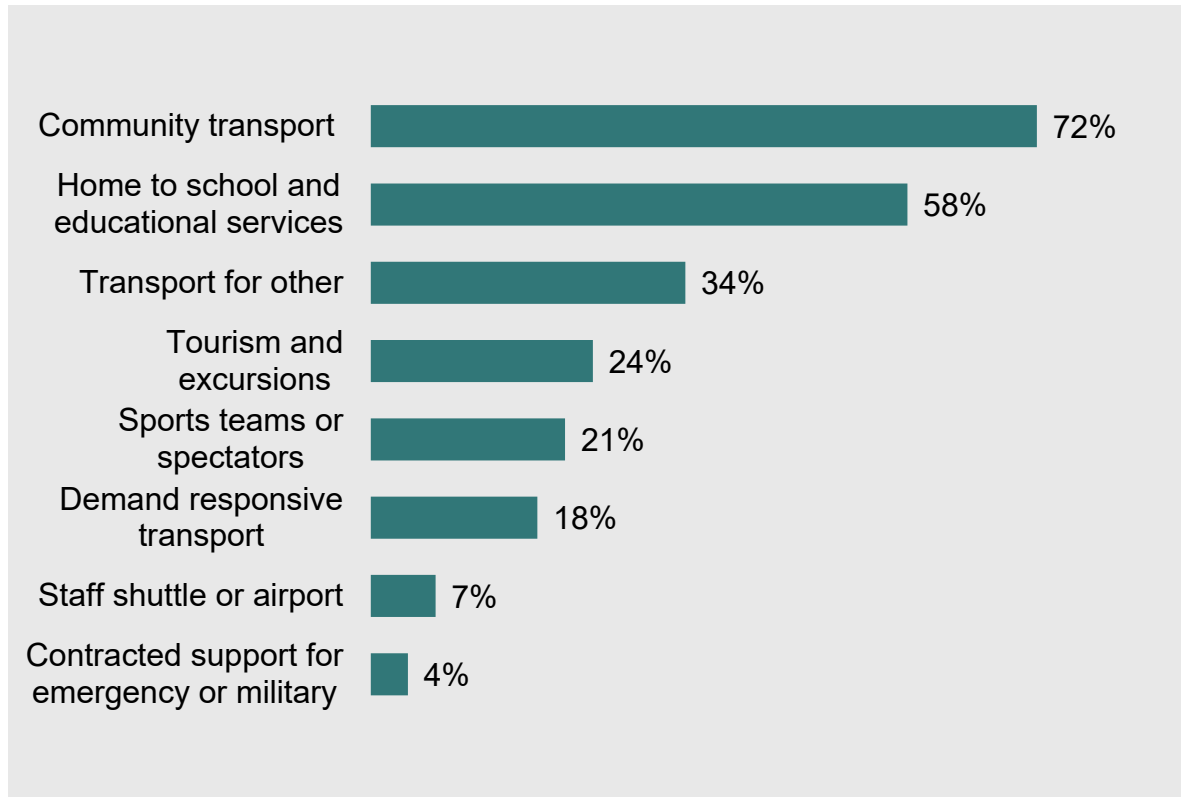


Base: All who provide minibus services (55*)

*Small base size

Q67a: Do you currently offer services and/or want to offer services within the future for?

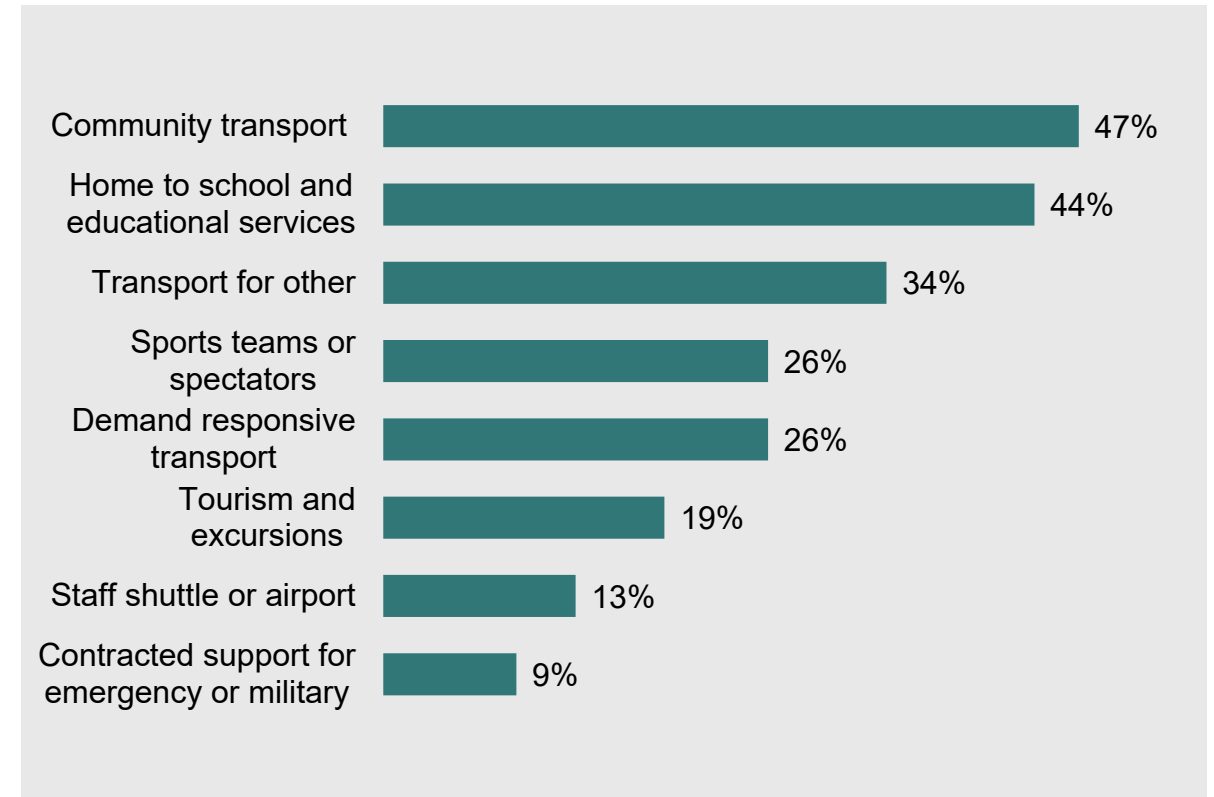
Currently offer services for:



Base: All who provide minibuses services (190)

Q67b: Do you currently offer services and/or want to offer services within the areas listed below?

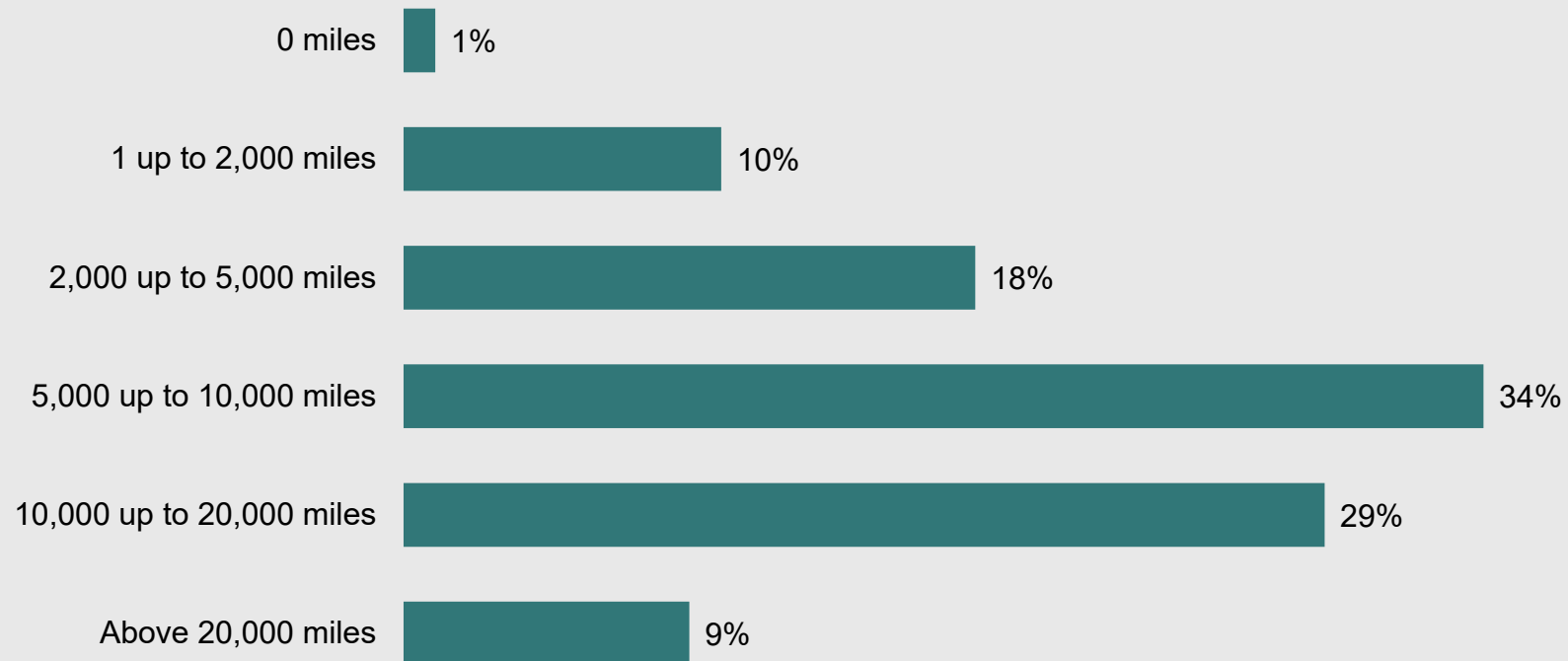
Want to offer services in the future for:



Base: All who provide minibuses services (77*)

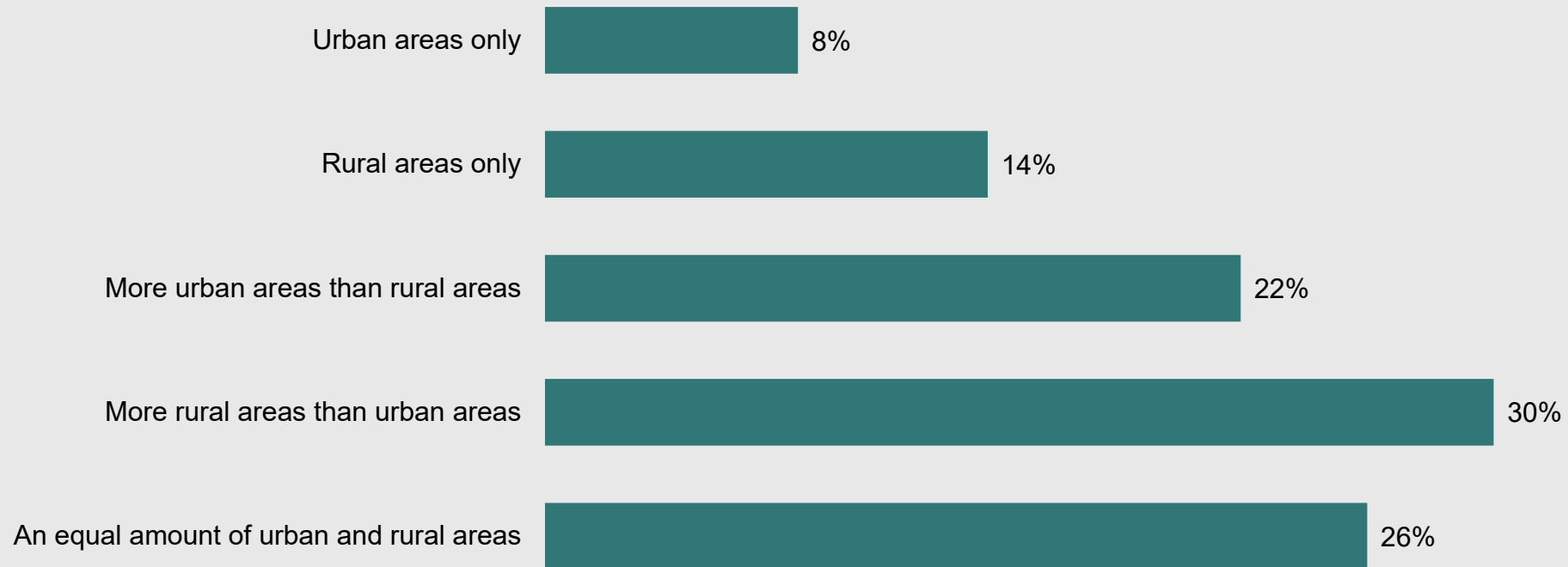
*Small base size

Q68: What is the average annual mileage, to the nearest mile, of a minibus?



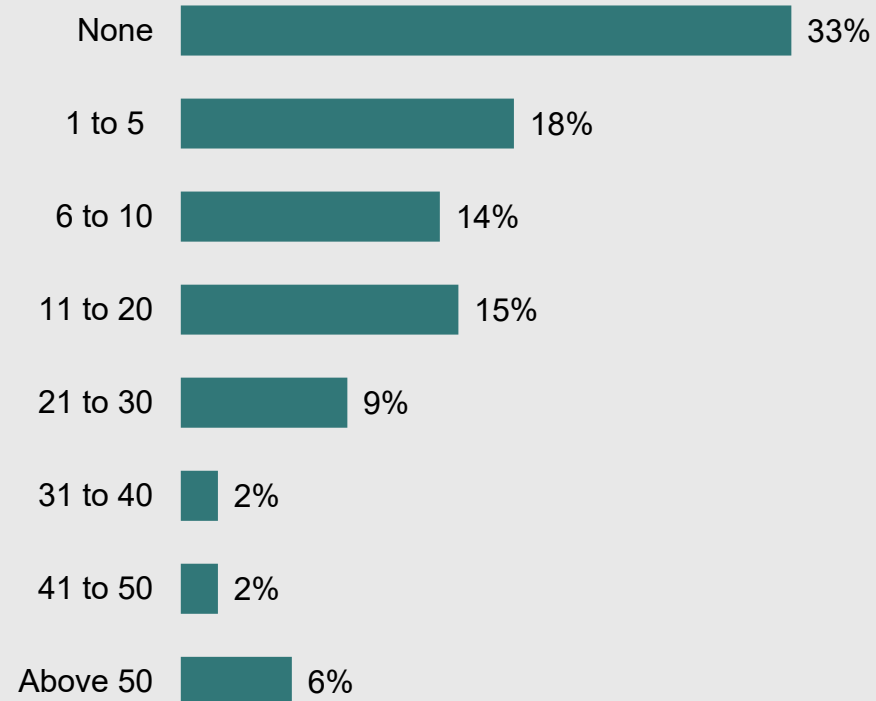
Base: All who provide minibus services (196)

Q69: Where do you operate minibus services?



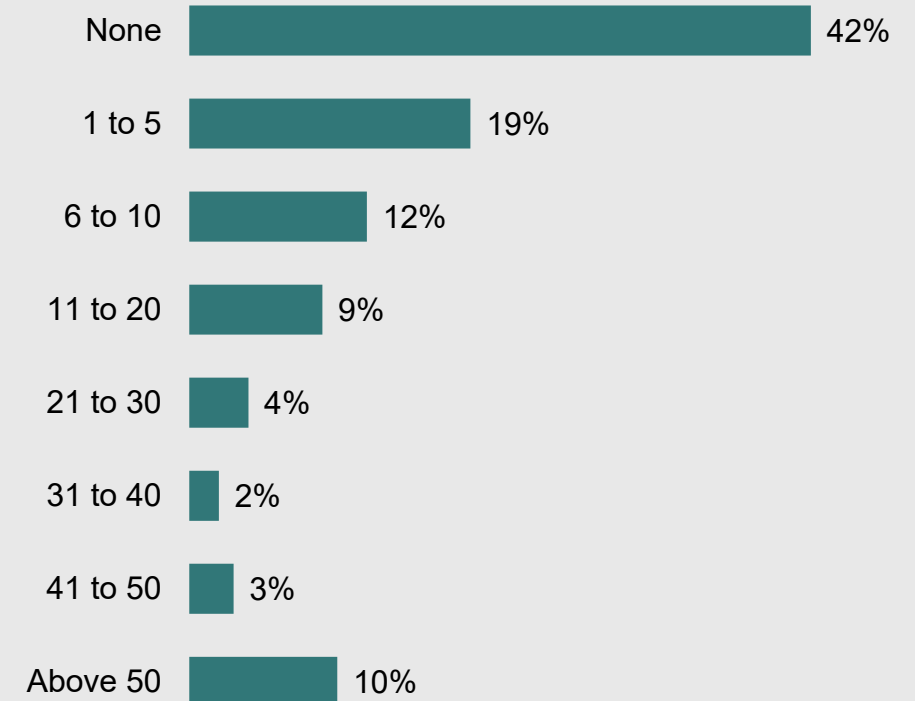
Base: All who provide minibus services (199)

Q70a: How many volunteer drivers do you have in total?



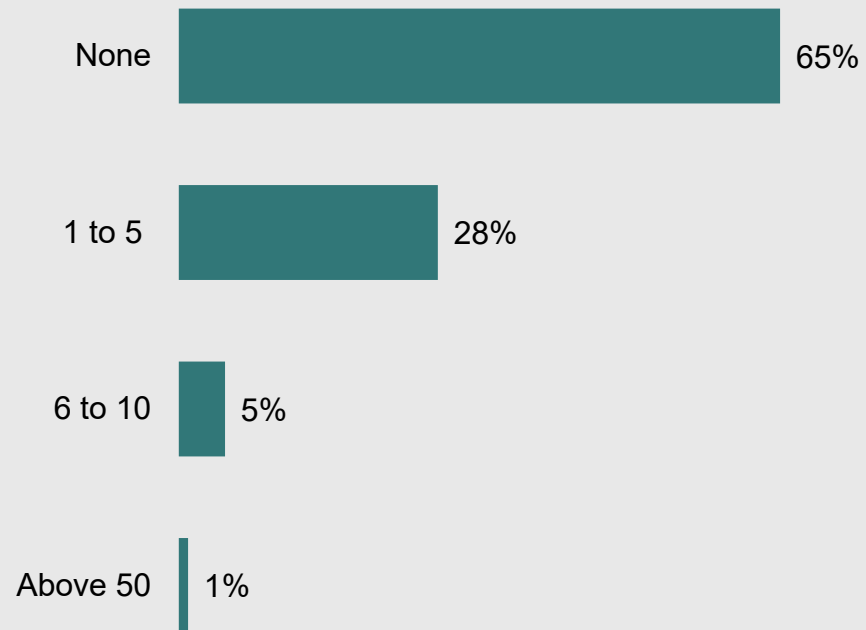
Base: All who provide minibus services (186)

Q70b: How many drivers do you pay to perform transport services?



Base: All who provide minibus services (188)

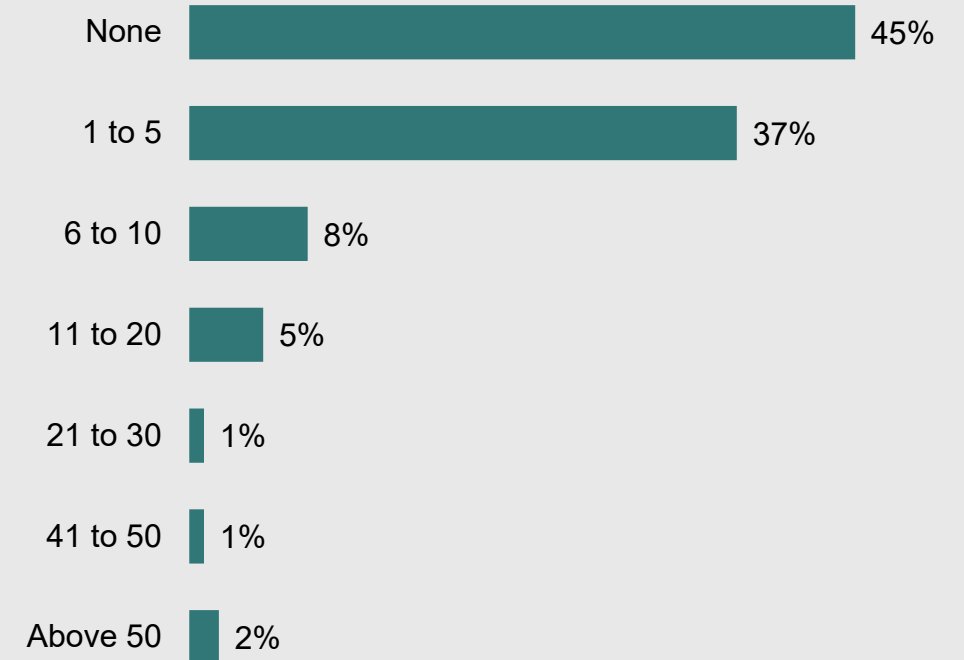
Q71a: How many of your volunteer drivers are aged 21 to 30 years?



Base: All who provide minibus services (75*)

*Small base size

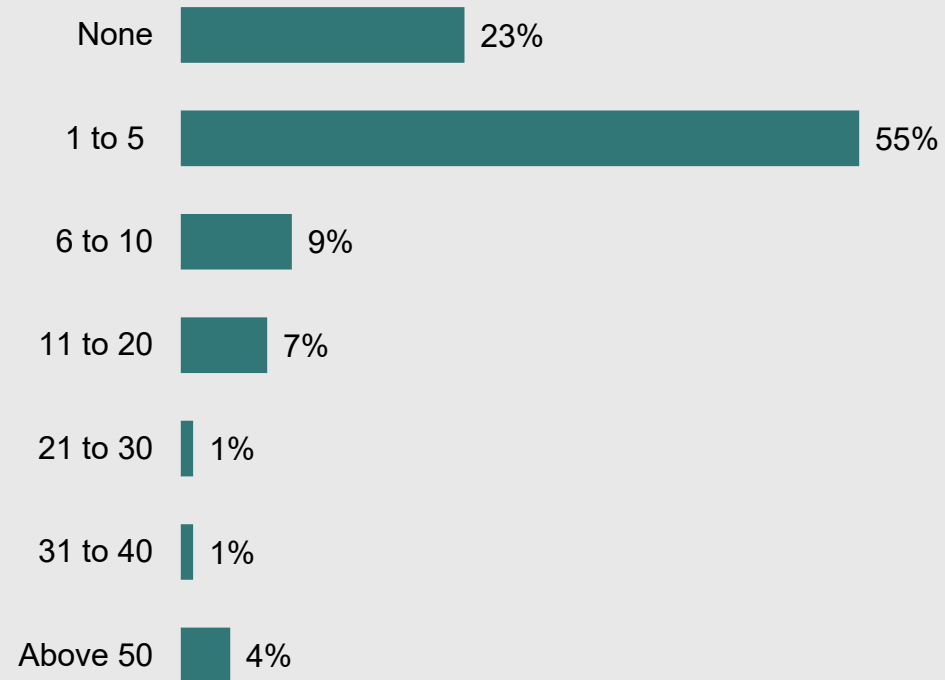
Q71b: How many of your volunteer drivers are aged 31 to 44 years?



Base: All who provide minibus services (86*)

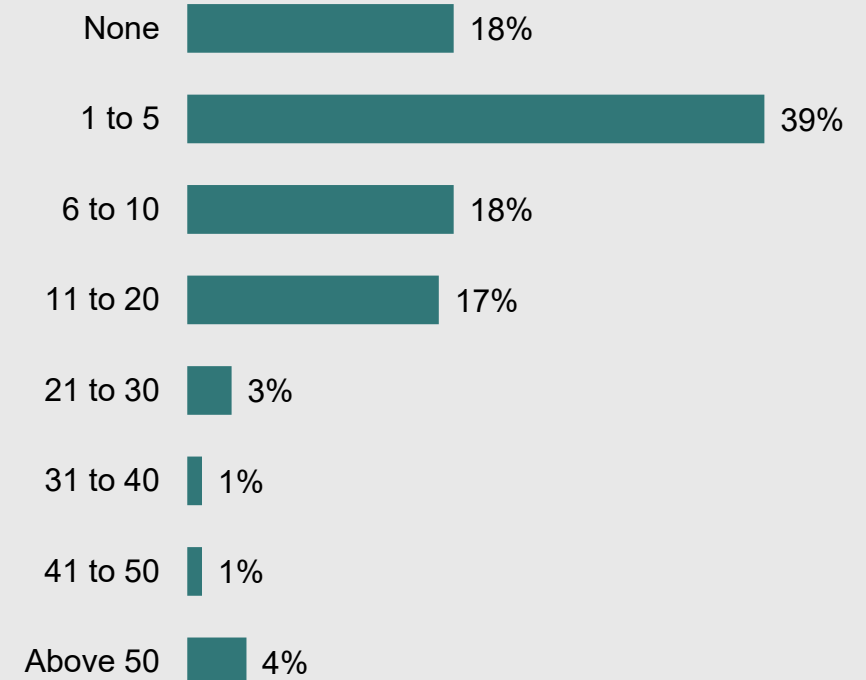
*Small base size

Q71c: How many of your volunteer drivers are aged 45 to 59 years?



Base: All who provide minibus services (119)

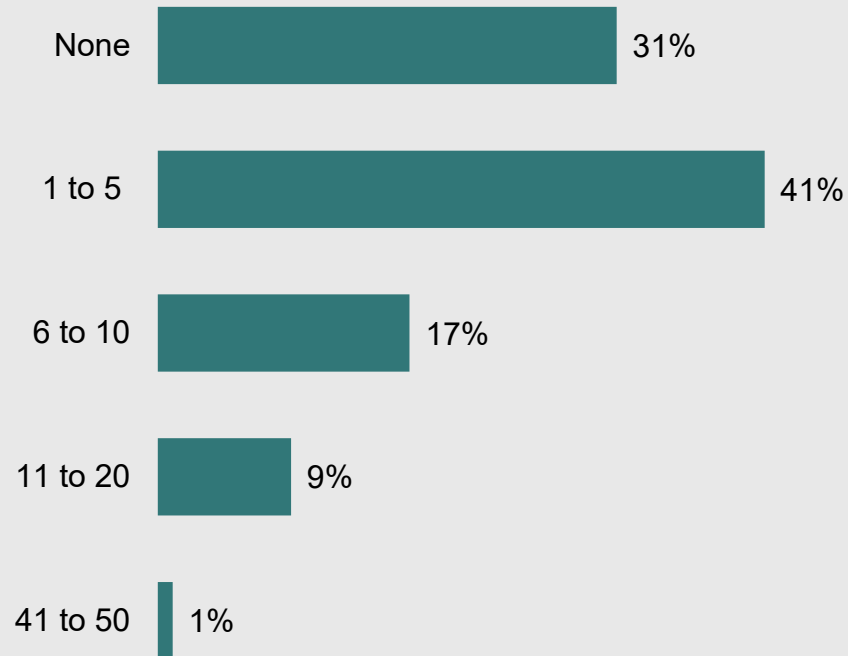
Q71d: How many of your volunteer drivers are aged 60 to 69 years?



Base: All who provide minibus services (119*)

*Small base size

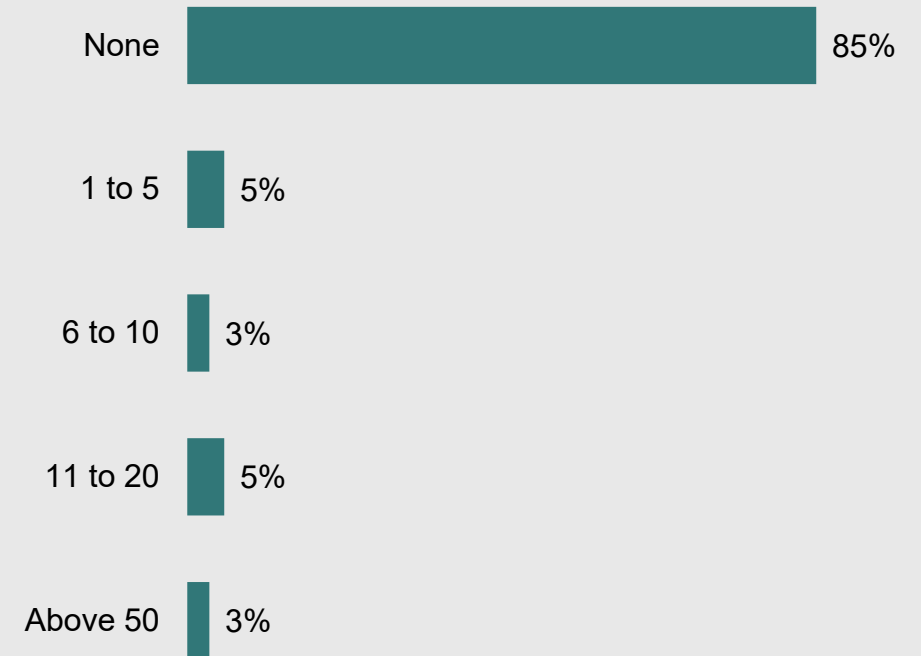
Q71e: How many of your volunteer drivers are aged 70 years and over?



Base: All who provide minibus services (99*)

*Small base size

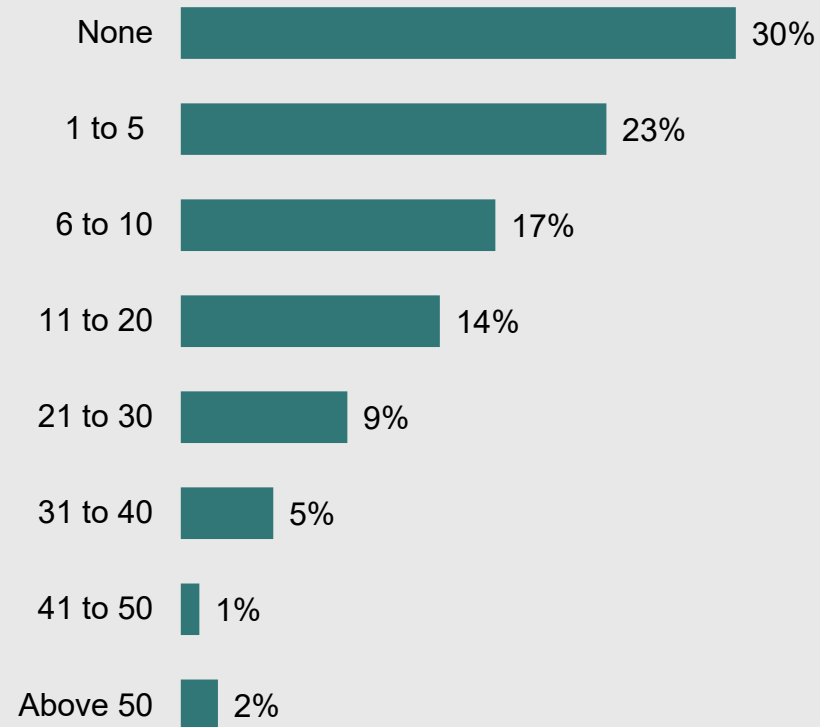
Q71f: How many volunteer drivers do you have whose age is unknown?



Base: All who provide minibus services (40*)

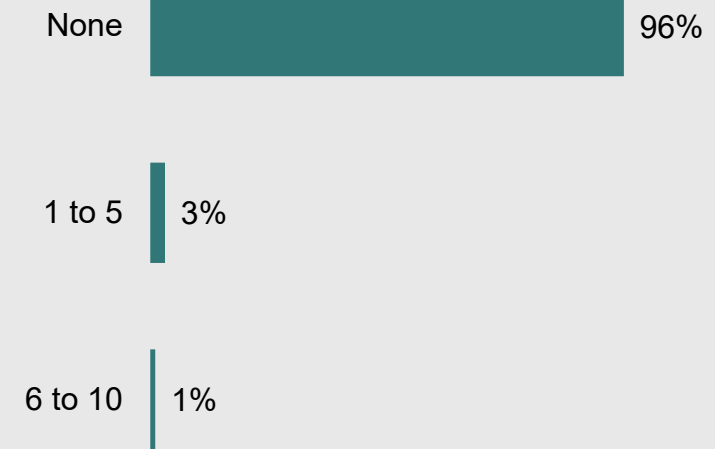
*Small base size

Q72a: How many of your volunteer drivers are retired?



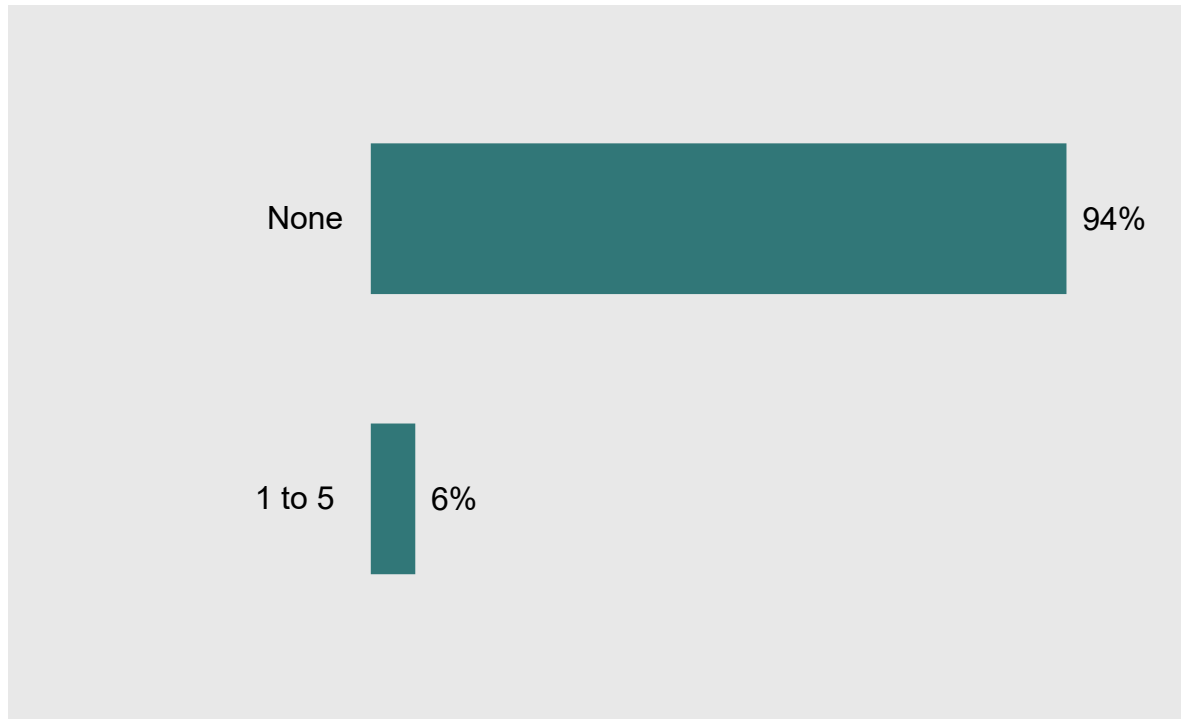
Base: All who provide minibus services (132)

Q72b: How many of your volunteer drivers have a primary occupation as a public sector PSV driver in addition to performing community transport services?



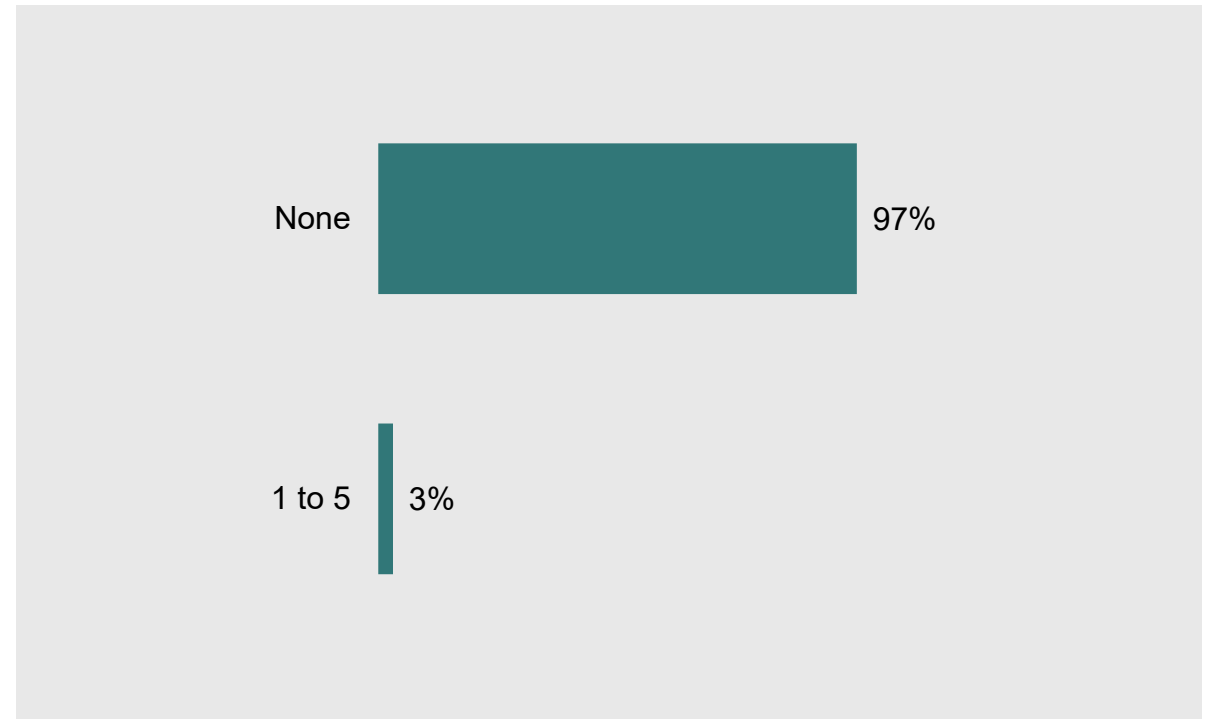
Base: All who provide minibus services (102)

Q72c: How many of your volunteer drivers have a primary occupation as a private sector PSV driver in addition to performing community transport services?



Base: All who provide minibus services (103)

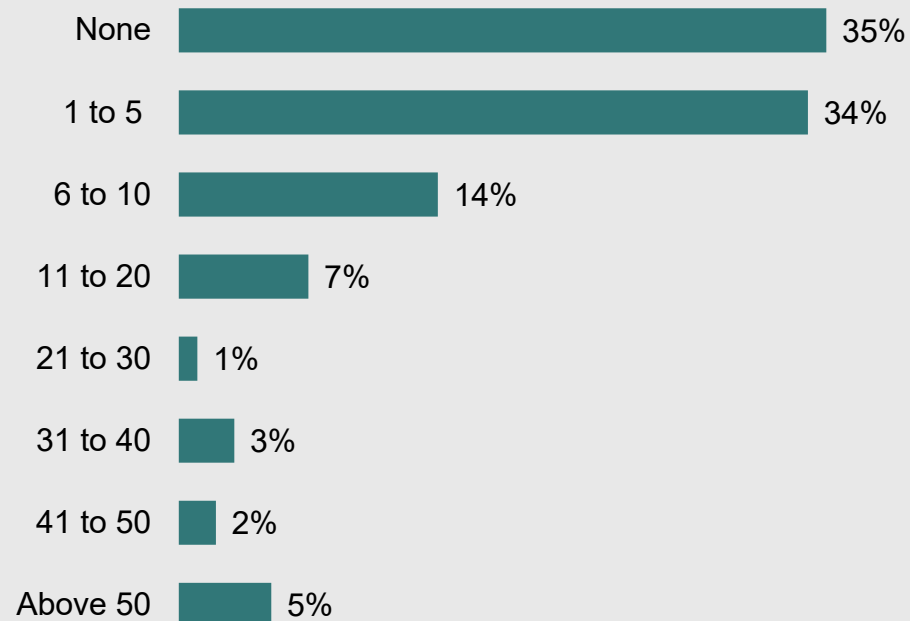
Q72d: How many of your volunteer drivers have a primary occupation as a third sector PSV driver in addition to performing community transport services?



Base: All who provide minibus services (98*)

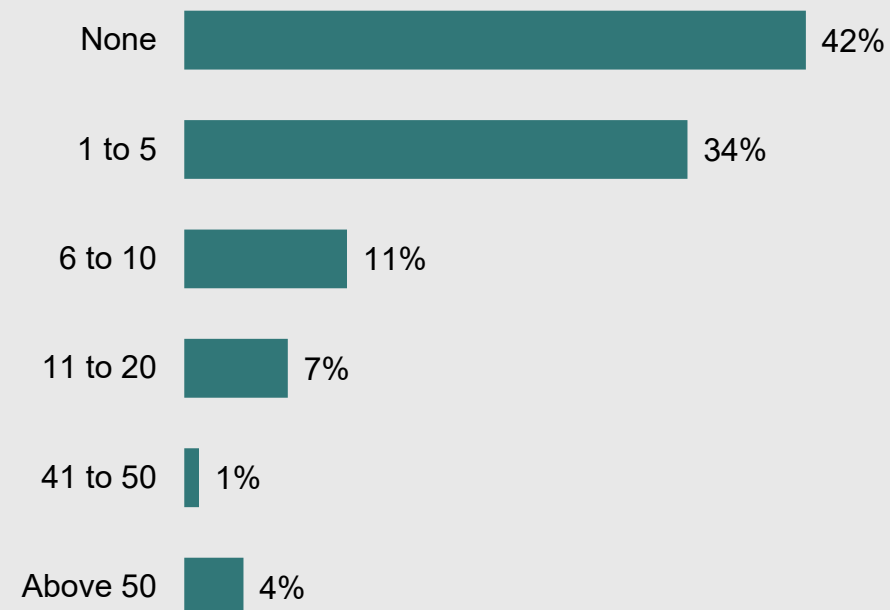
*Small base size

Q72e: How many of your volunteer drivers have a primary occupation which is unrelated to passenger transport?



Base: All who provide minibus services (110)

Q72f: How many of your volunteer drivers undertake non-paid work for other organisations?



Base: All who provide minibus services (99*)

*Small base size

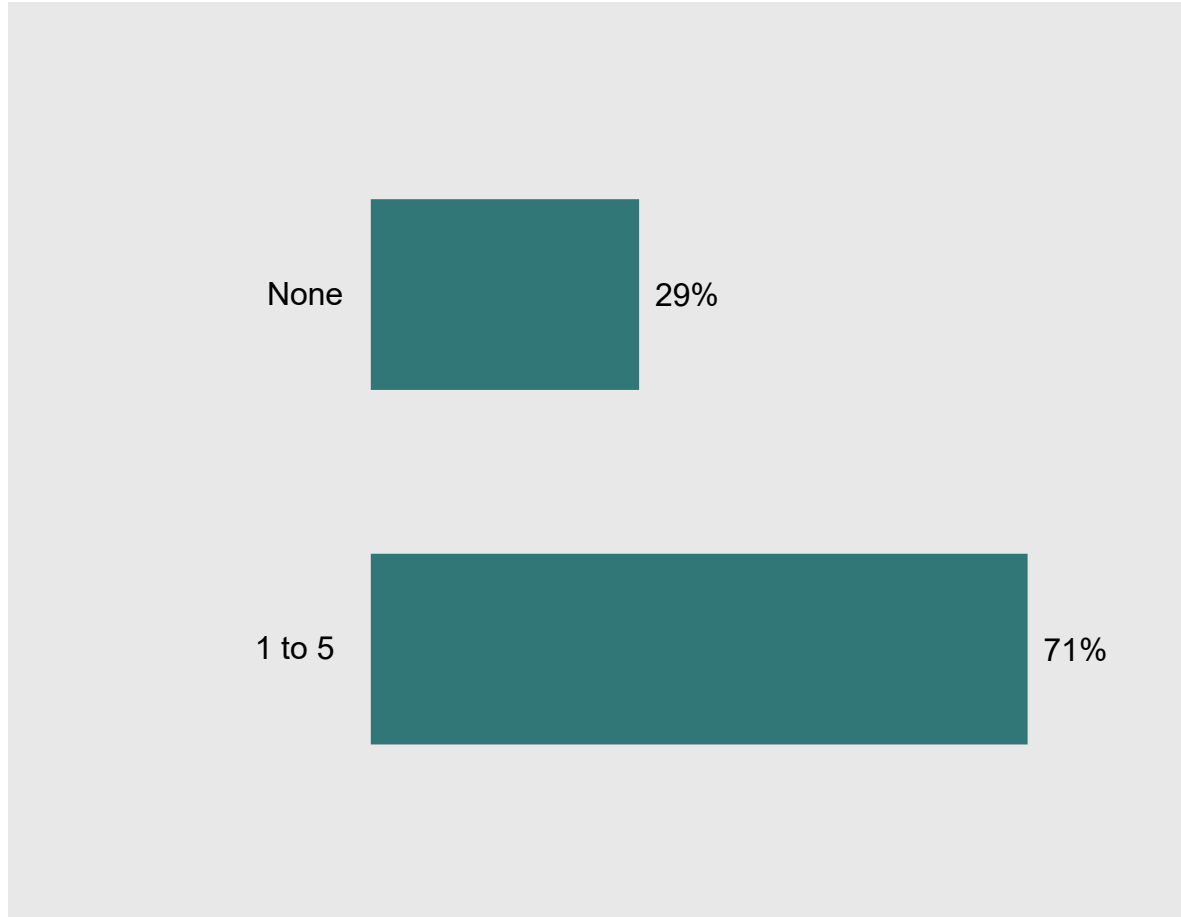
Q72g: How many of your volunteer drivers have an unknown status?



Base: All who provide minibus services (78*)

*Small base size

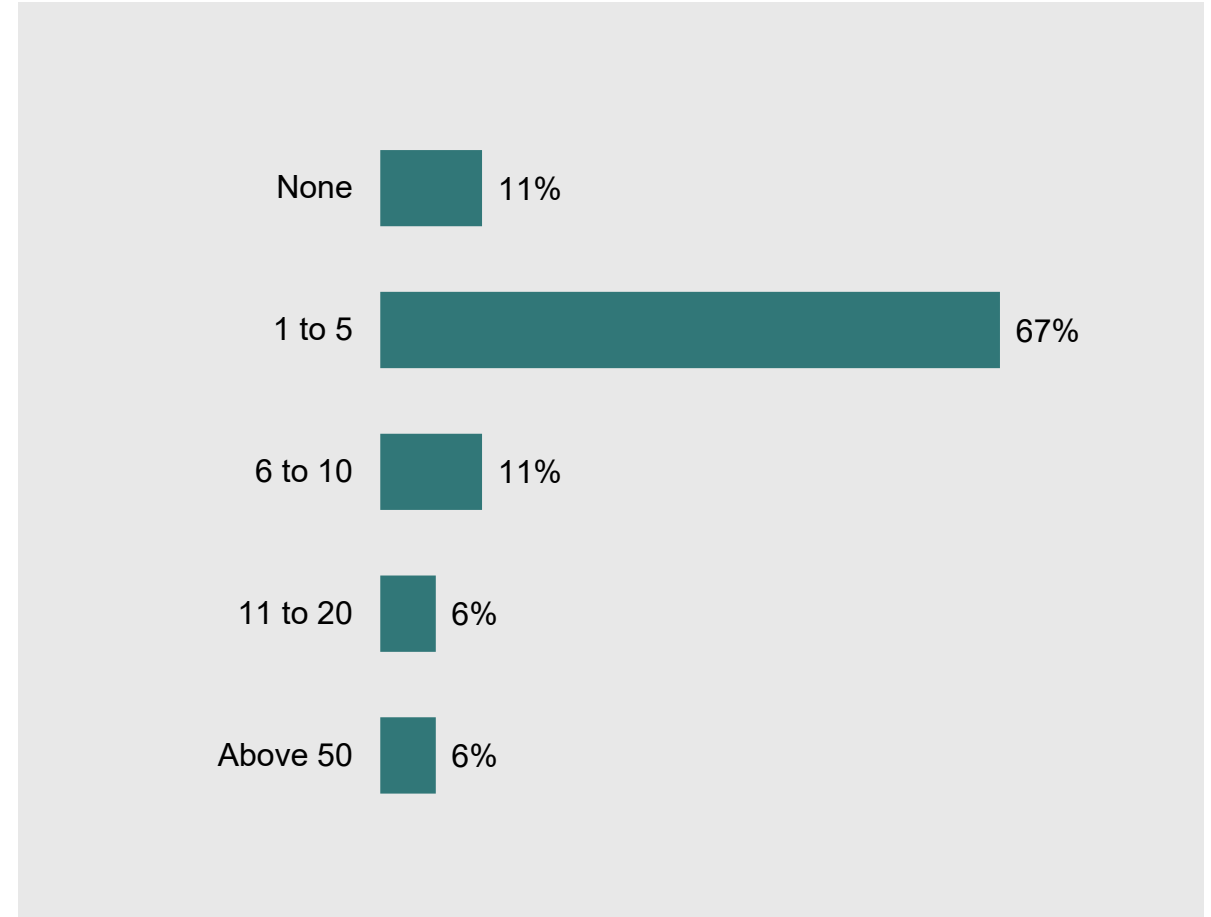
Q73a: How many of your paid drivers are between 18 and 20 years of age?



Base: All who provide minibus services (7**)

** Very small base size

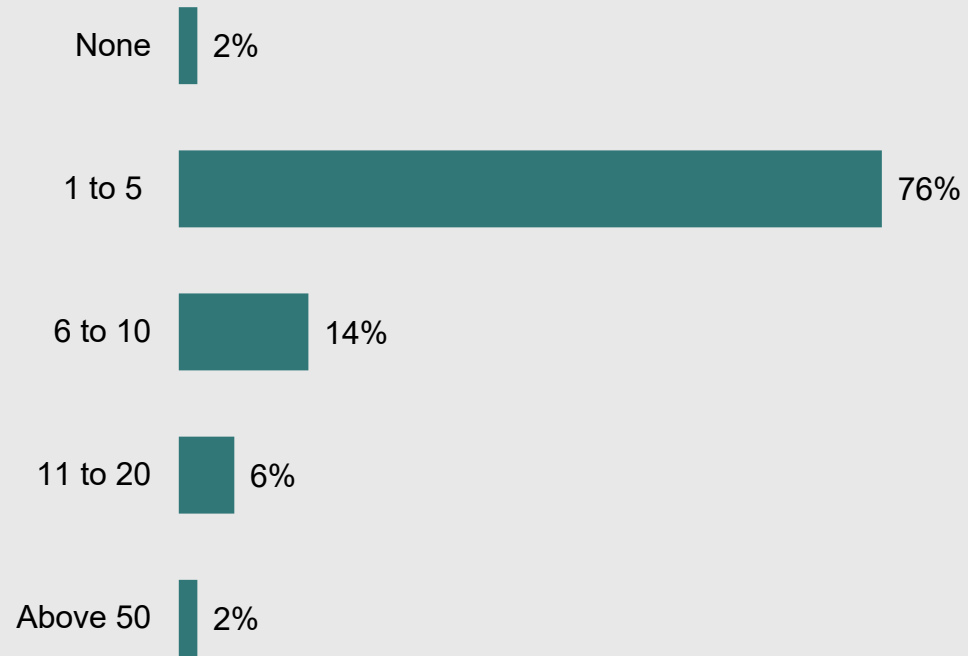
Q73b: How many of your paid drivers are between 21 and 30 years of age?



Base: All who provide minibus services (18**)

** Very small base size

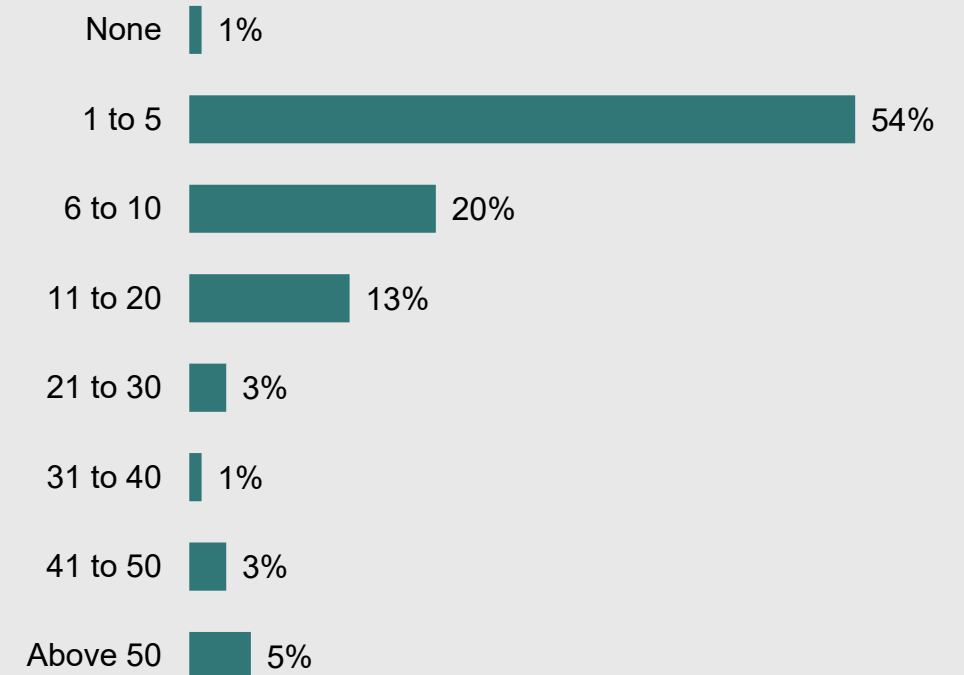
Q73c: How many of your paid drivers are between 31 and 44 years of age?



Base: All who provide minibus services (51*)

* Small base size

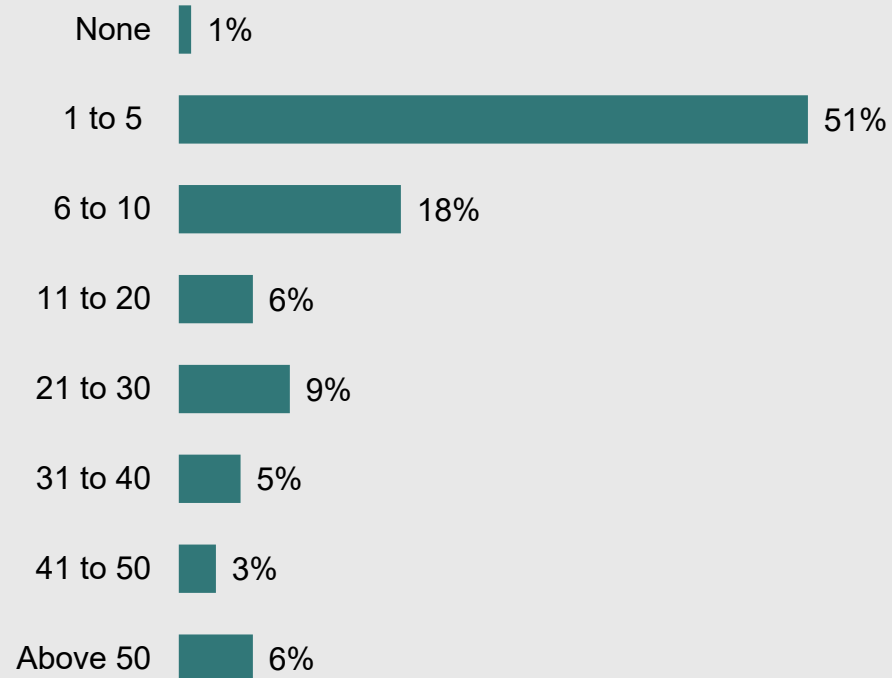
Q73d: How many of your paid drivers are between 45 and 58 years of age?



Base: All who provide minibus services (97*)

* Small base size

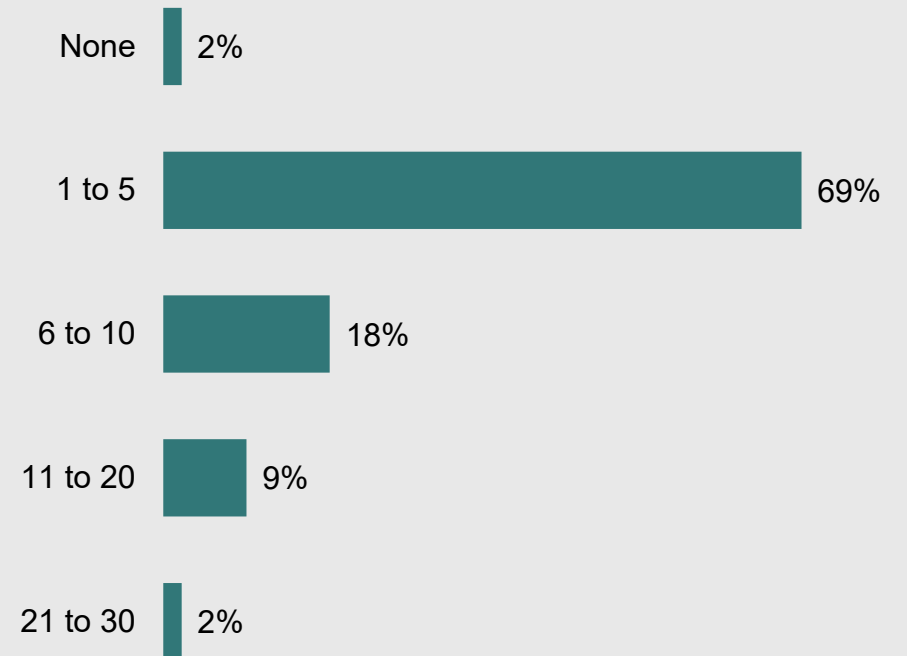
Q73e: How many of your paid drivers are between 59 and 70 years of age?



Base: All who provide minibus services (96*)

* Small base size

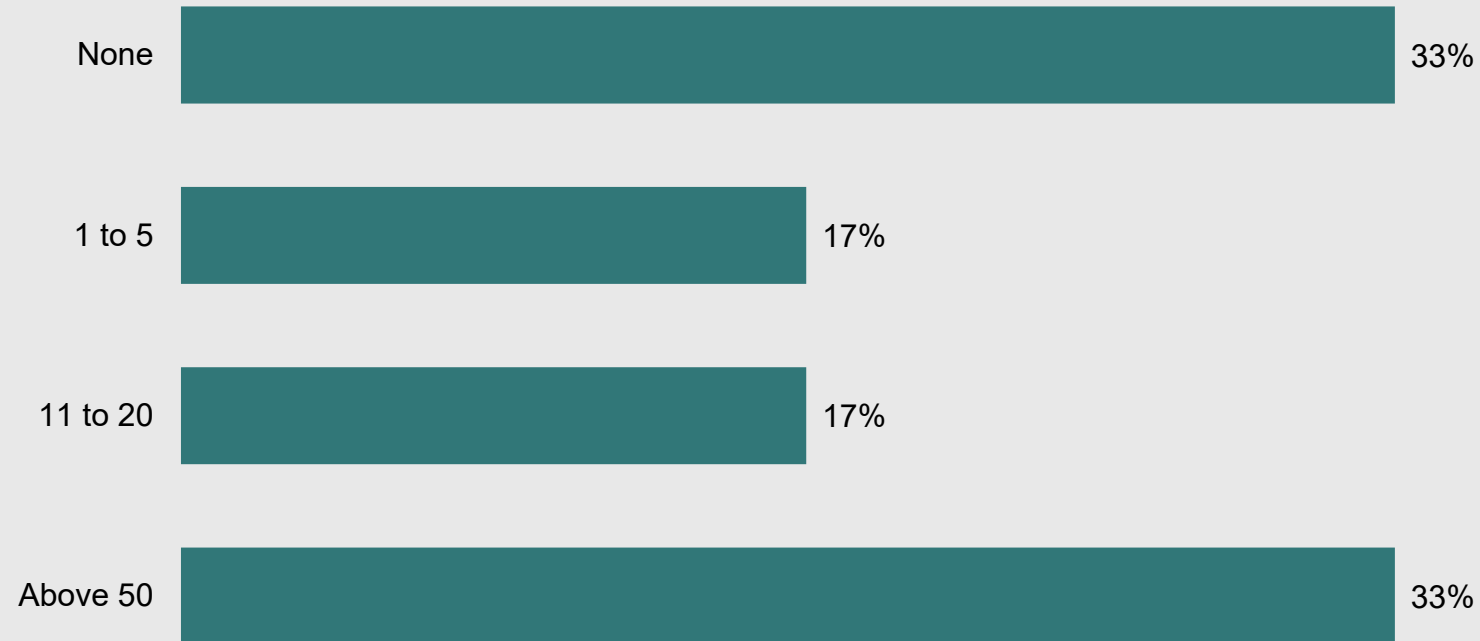
Q73f: How many of your paid drivers are over 70 years of age?



Base: All who provide minibus services (45*)

* Small base size

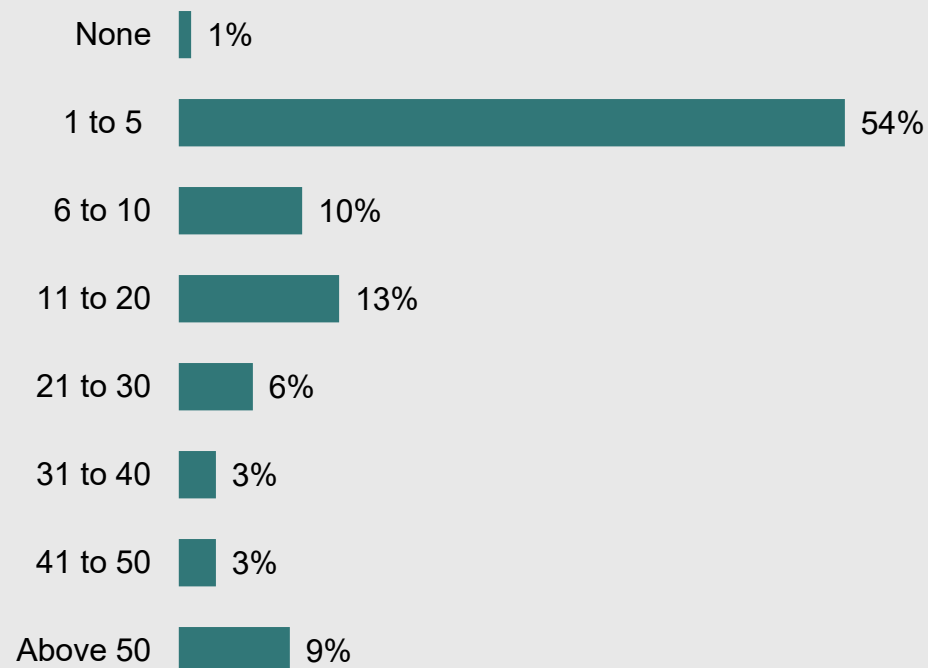
Q73g: How many paid drivers do you have whose age is unknown?



Base: All who provide minibus services (6**)

** Very small base size

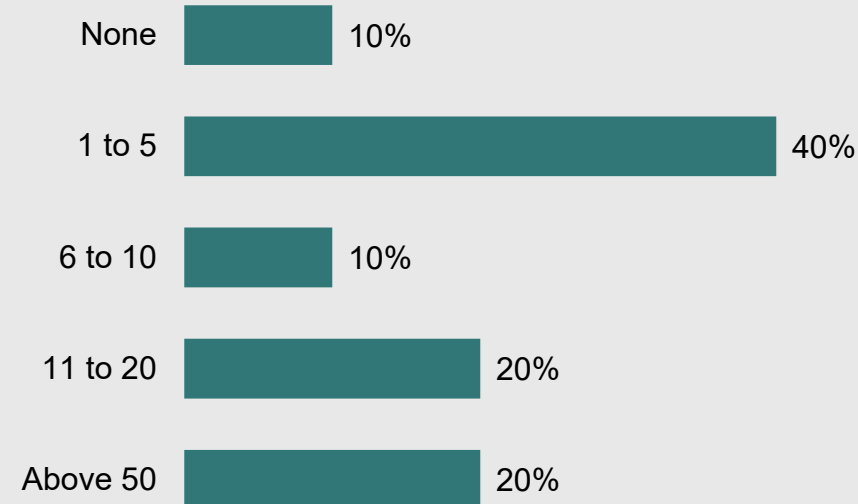
Q74a: How many of your paid drivers are retired from their primary occupation?



Base: All who provide minibus services (68*)

* Small base size

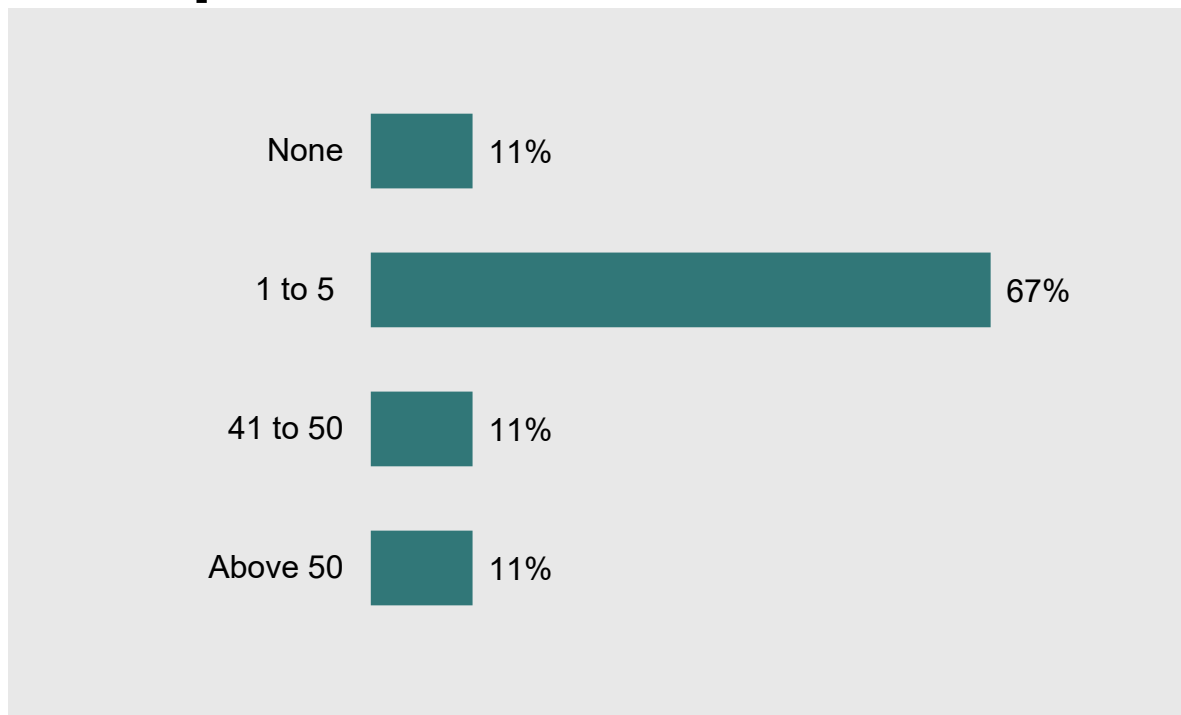
Q74b: How many of your paid drivers have a primary occupation as a public sector PSV driver in addition to performing community transport services?



Base: All who provide minibus services (10**)

** Very small base size

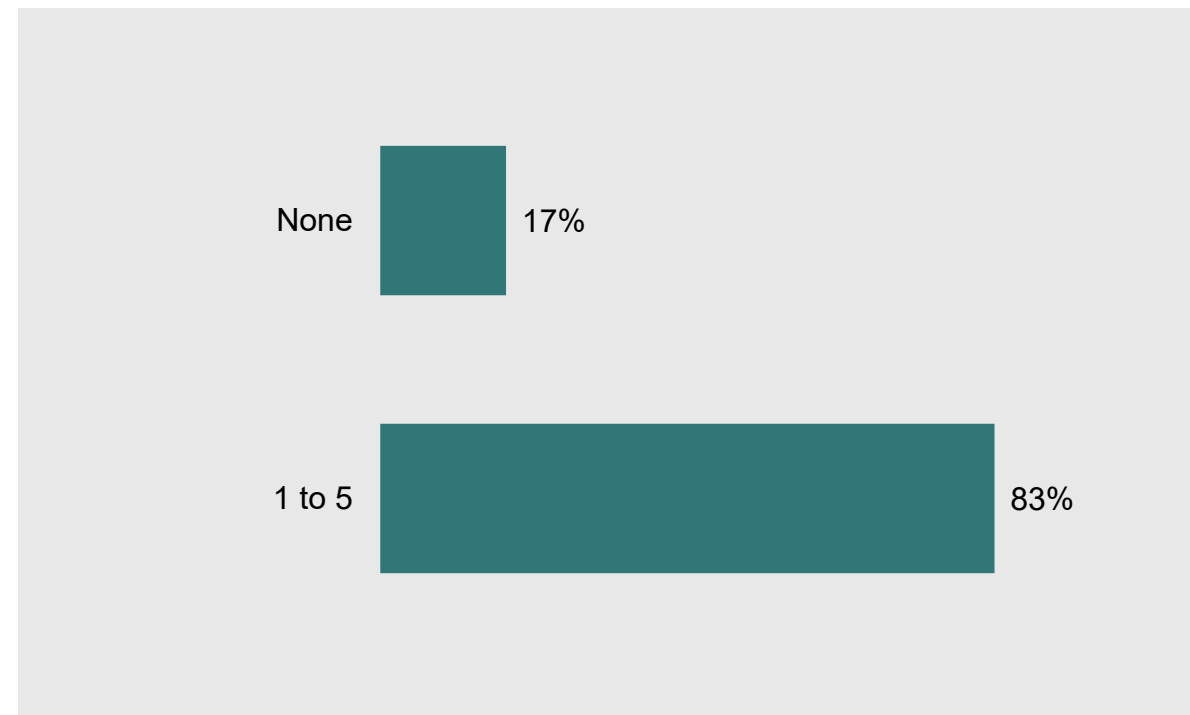
Q74c: How many of your paid drivers have a primary occupation as a private sector PSV driver in addition to performing community transport services?



Base: All who provide minibus services (9**)

** Very small base size

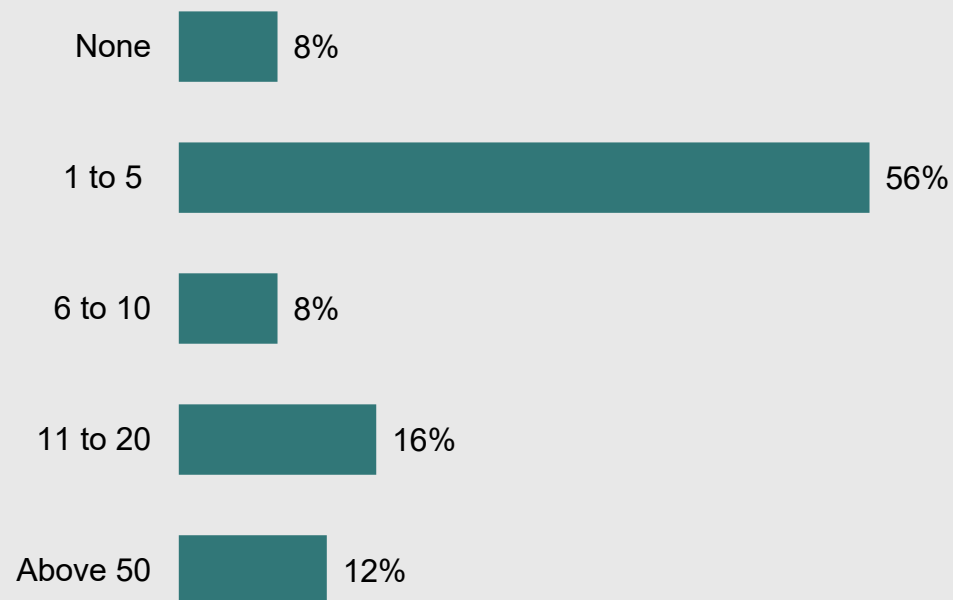
Q74d: How many of your paid drivers have a primary occupation as a third sector PSV driver in addition to performing community transport services?



Base: All who provide minibus services (6**)

** Very small base size

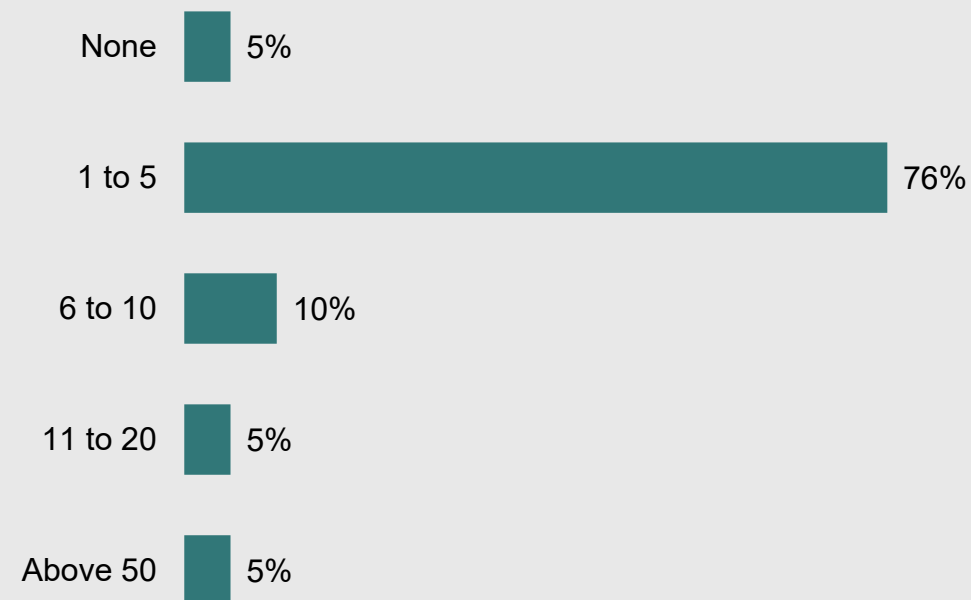
Q74e: How many of your paid drivers have a primary occupation which is unrelated to passenger transport?



Base: All who provide minibus services (25**)

** Very small base size

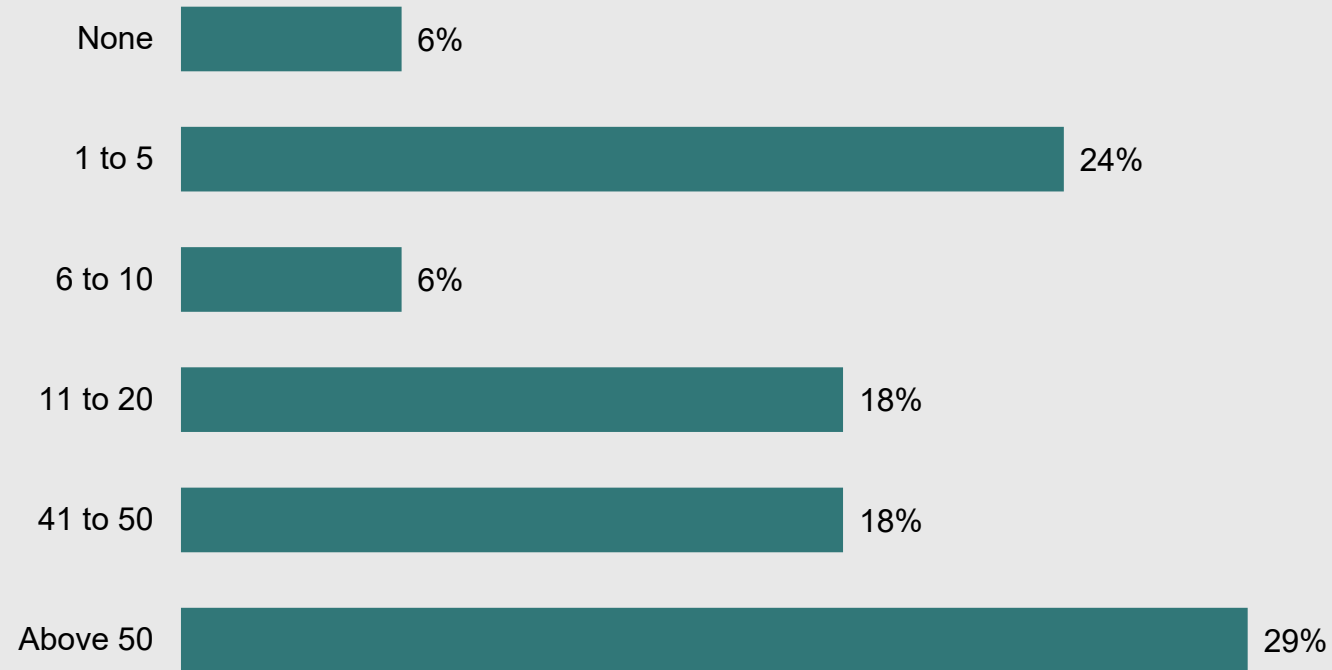
Q74f: How many of your paid drivers undertake non-paid work for other organisations?



Base: All who provide minibus services (21**)

** Very small base size

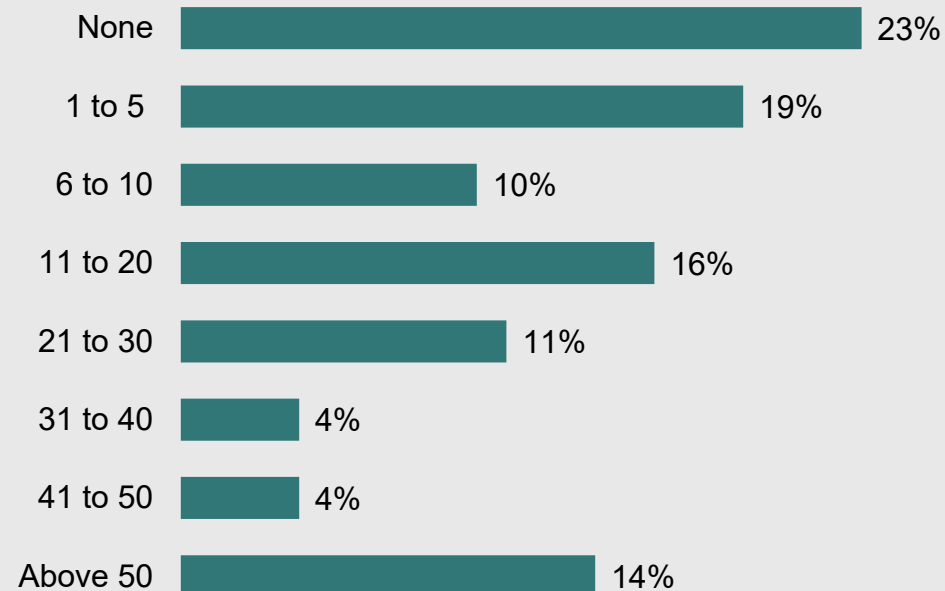
Q74g: How many of your paid drivers have an unknown status?



Base: All who provide minibus services (17**)

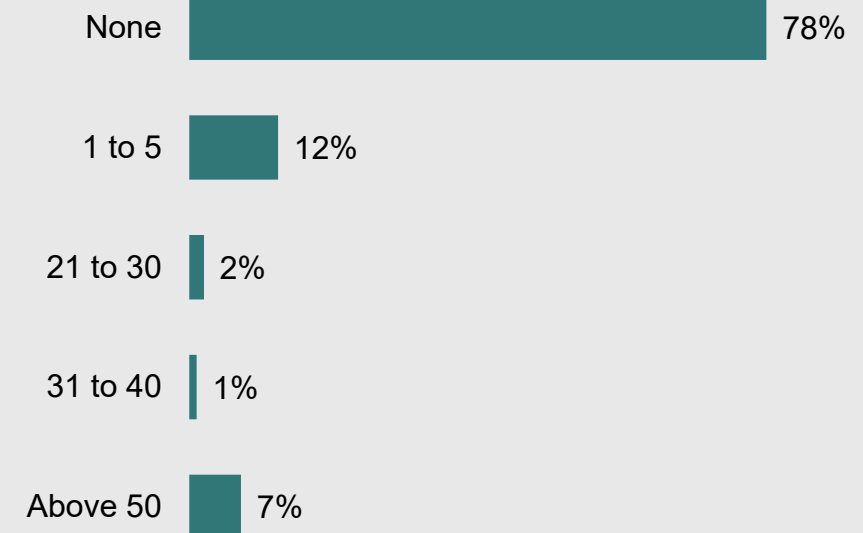
** Very small base size

Q75a: How many of your drivers have undertaken the Minibus Drivers Awareness Scheme (MiDAS), financed by your organisation?



Base: All who provide minibus services (166)

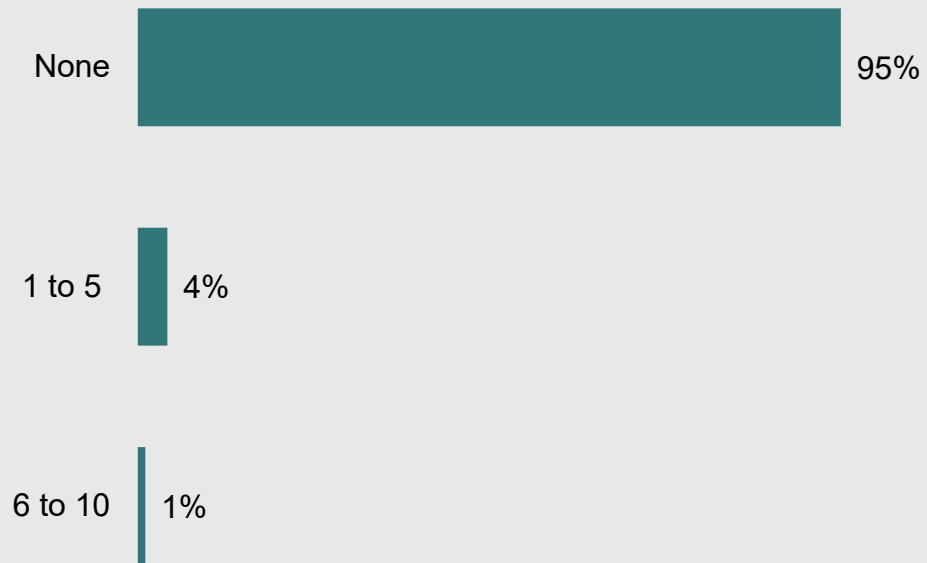
Q75b: How many of your drivers have undertaken MiDAS, financed by another transport organisation?



Base: All who provide minibus services (90*)

* Small base size

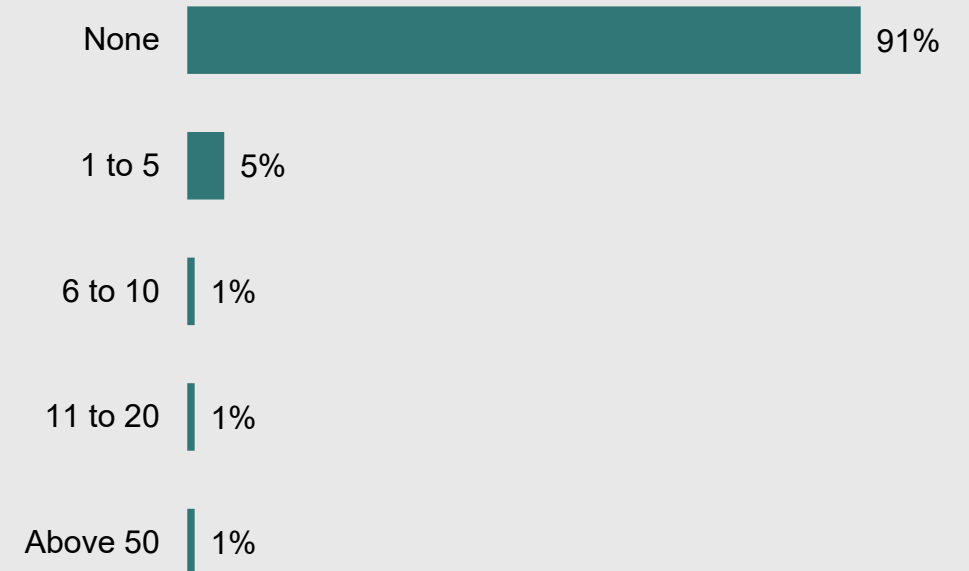
Q75c: How many of your drivers have undertaken MiDAS, financed by themselves?



Base: All who provide minibus services (81*)

* Small base size

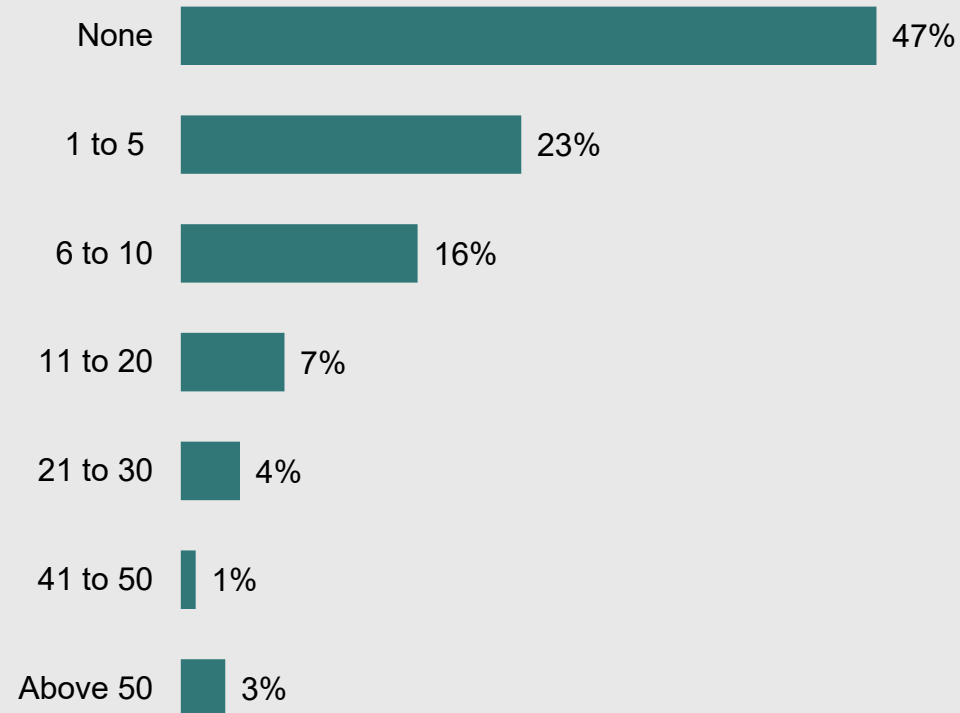
Q75d: How many of your drivers have undertaken MiDAS, financed by more than one individual or organisation?



Base: All who provide minibus services (81*)

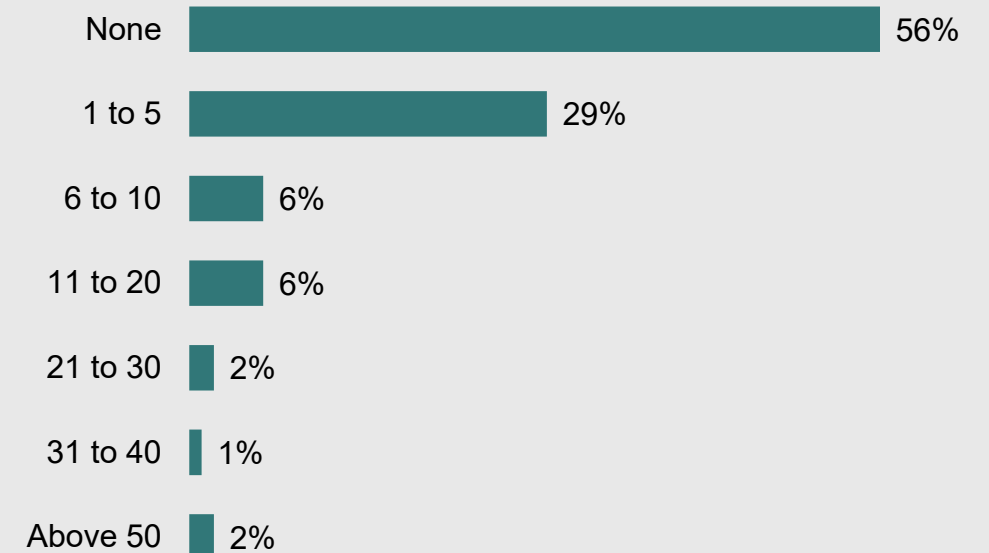
* Small base size

Q75e: How many of your drivers have not undertaken MiDAS?



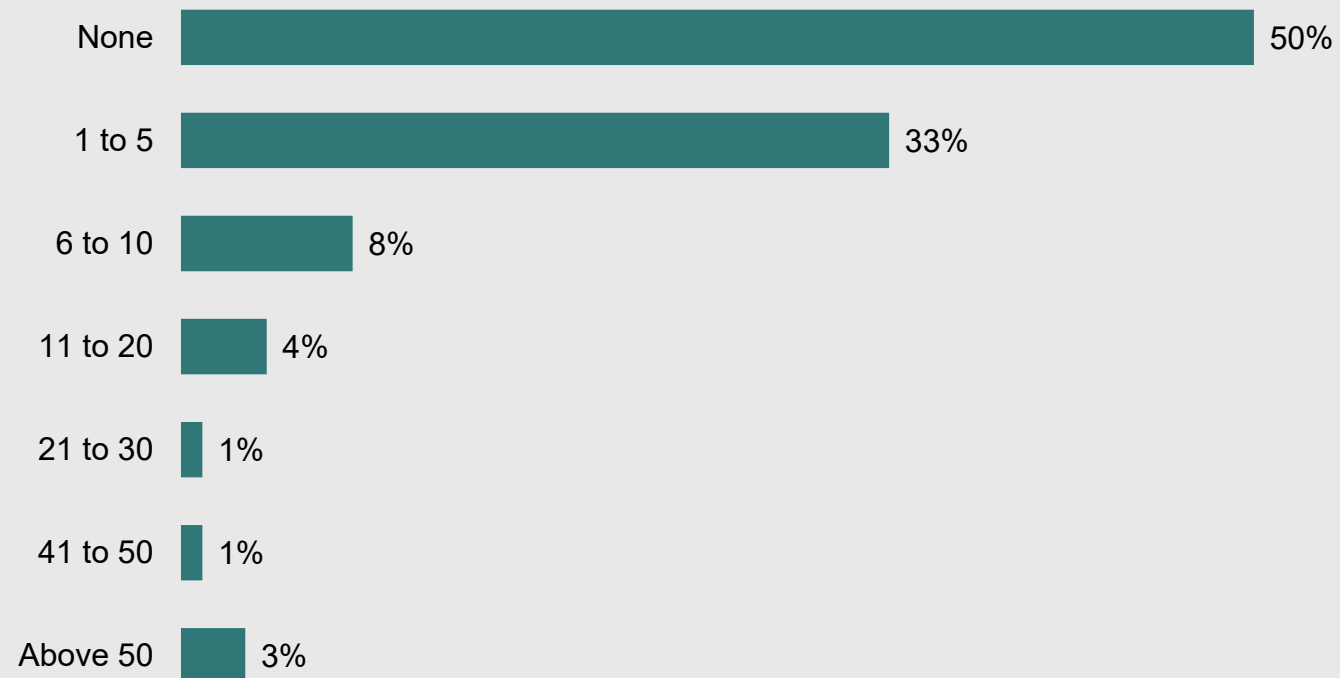
Base: All who provide minibus services (102)

Q75f: How many of your drivers have undertaken the Drivers Certificate of Professional Competence (DCPC) qualification?



Base: All who provide minibus services (108)

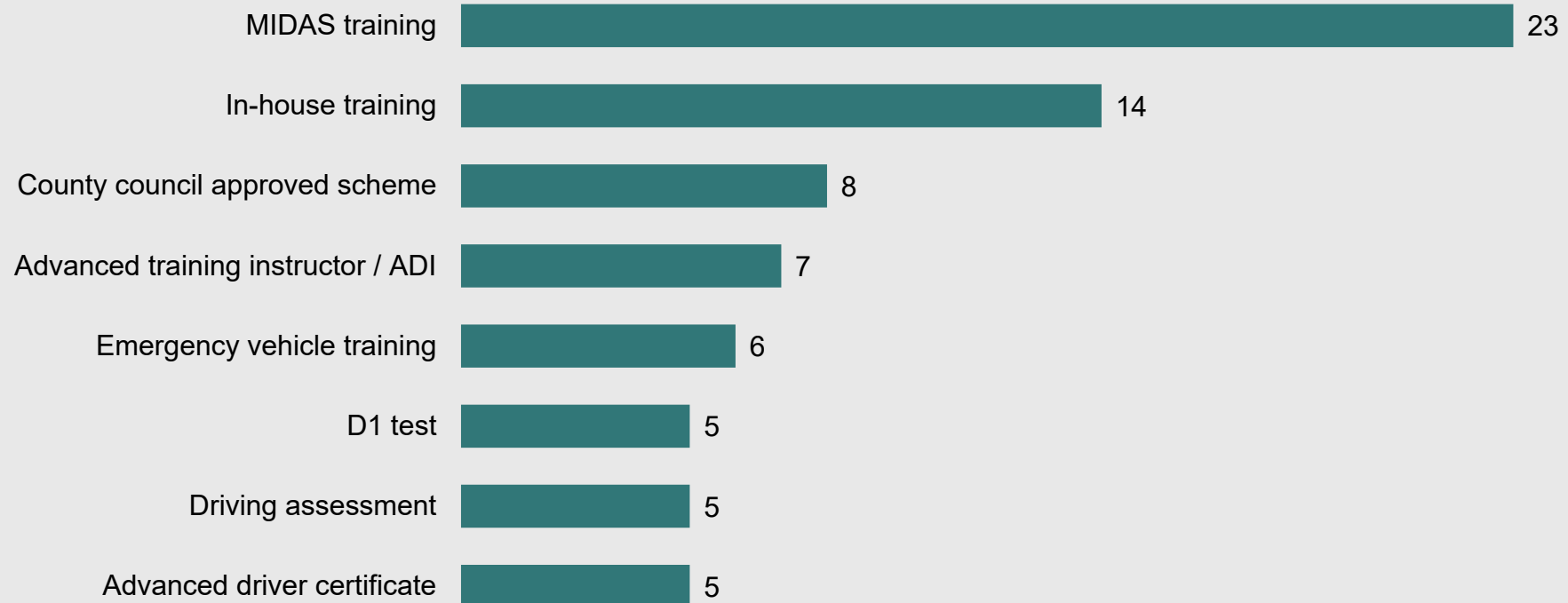
Q75g: How many of your drivers have other advanced driver or minibus training?



Base: All who provide minibus services (100)

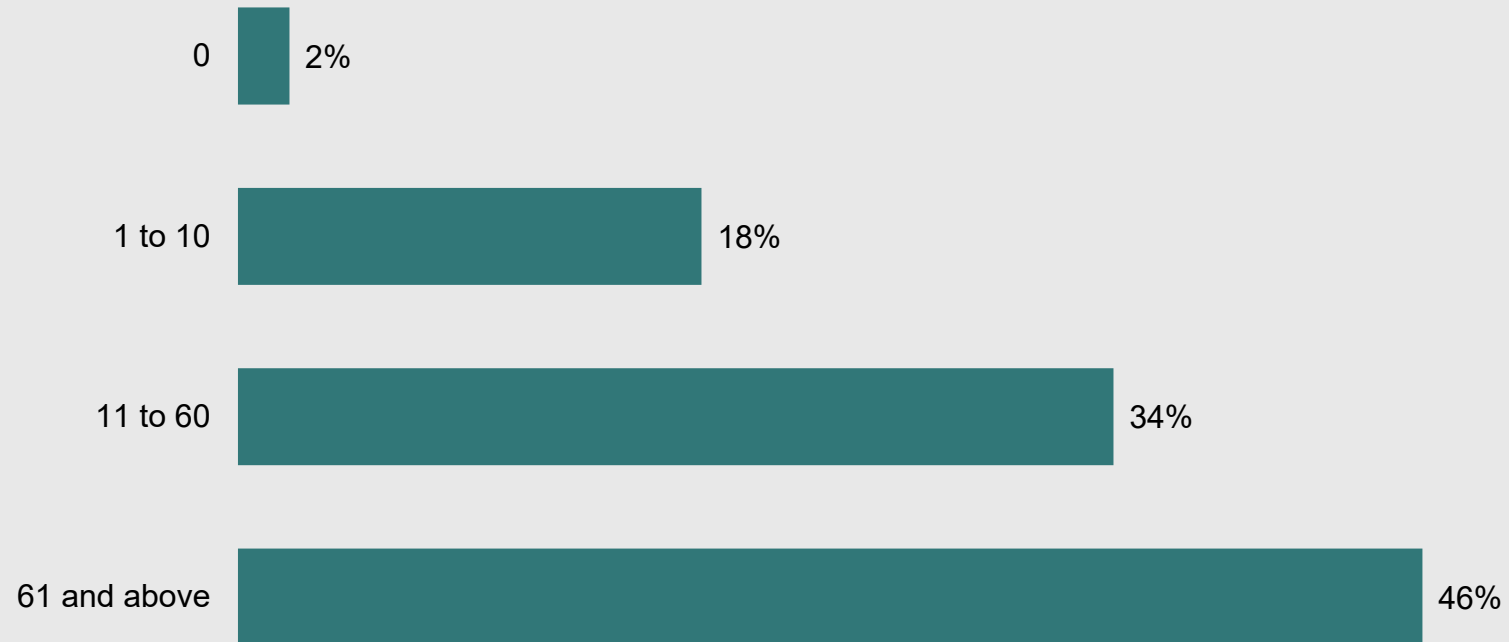
Q75h: Specify any other advanced driver or minibus training:

Other advanced driver or minibus training – most frequently made comments



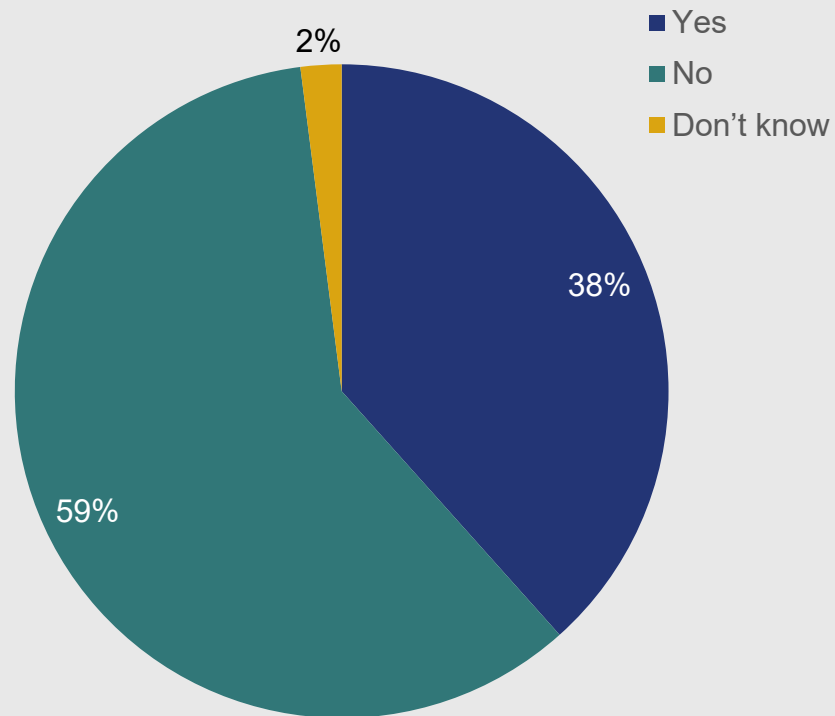
Base: All who provide minibus services and specified another type of training (70)

Q76: Approximately how many services do you run per month?



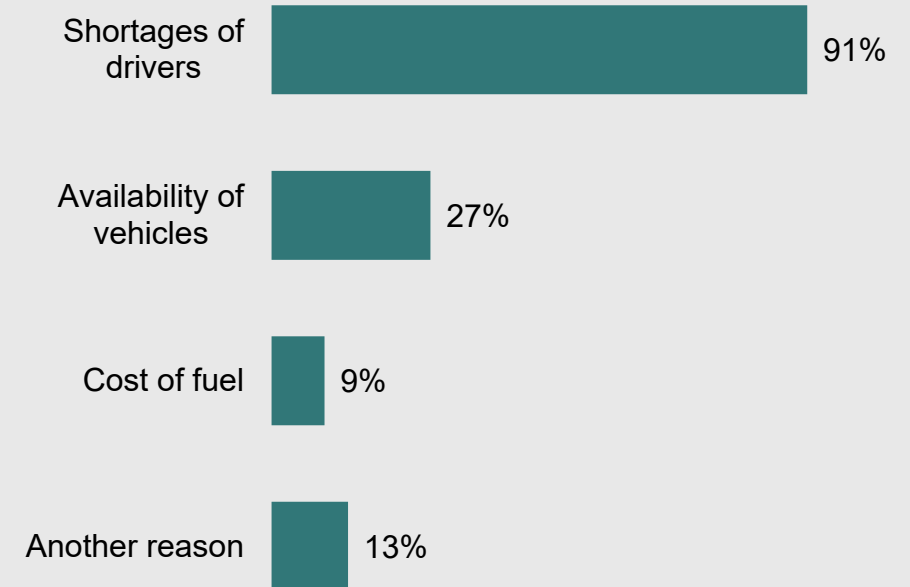
Base: All who provide minibus services (194)

Q77: Are you currently able to provide enough services to meet demand?



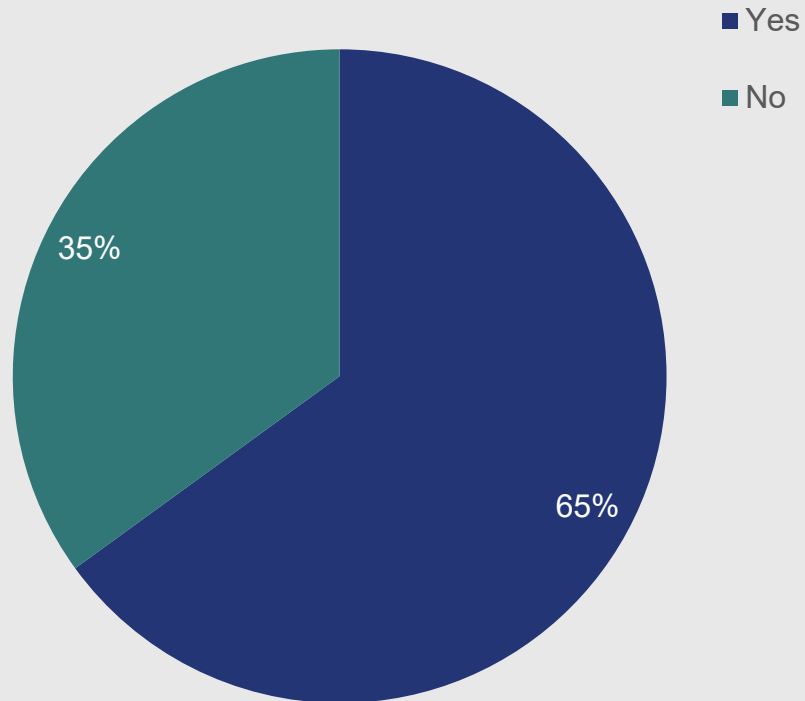
Base: All who provide minibus services (195)

Q78: You cannot currently provide sufficient services to meet demand due to ...?



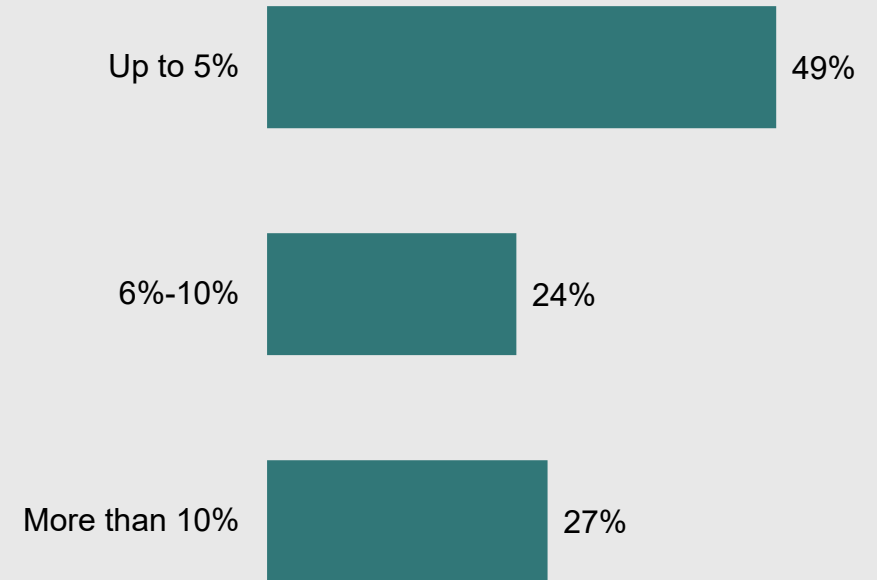
Base: All who provide minibus services but are unable to provide enough services to meet demand (116)

Q79: Have you previously had to cancel any services (including short term and temporary cancellations)?



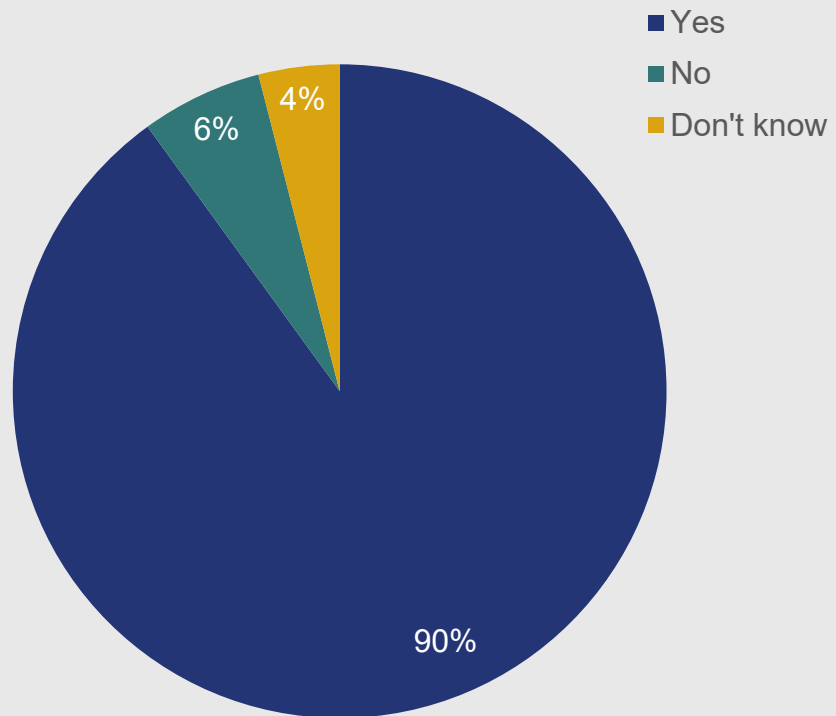
Base: All who provide minibus services (197)

Q80: What percentage (%) of services have you had to cancel in the last year?



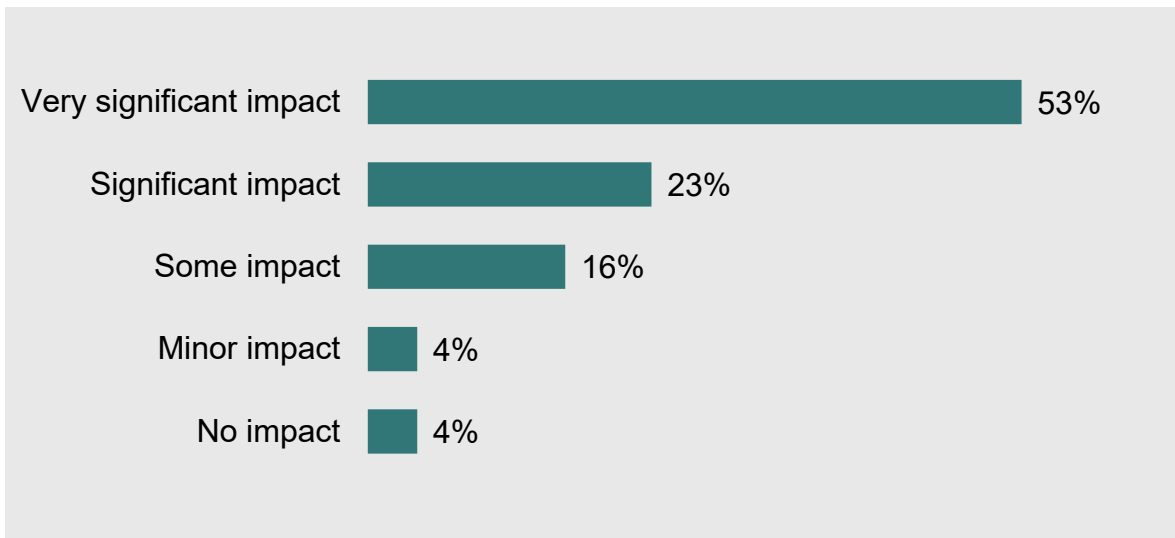
Base: All who provide minibus services and have previously had to cancel any services (including) short term and temporary cancellations) (121)

Q81: Do you believe there have been driver shortages within the minibus sector?



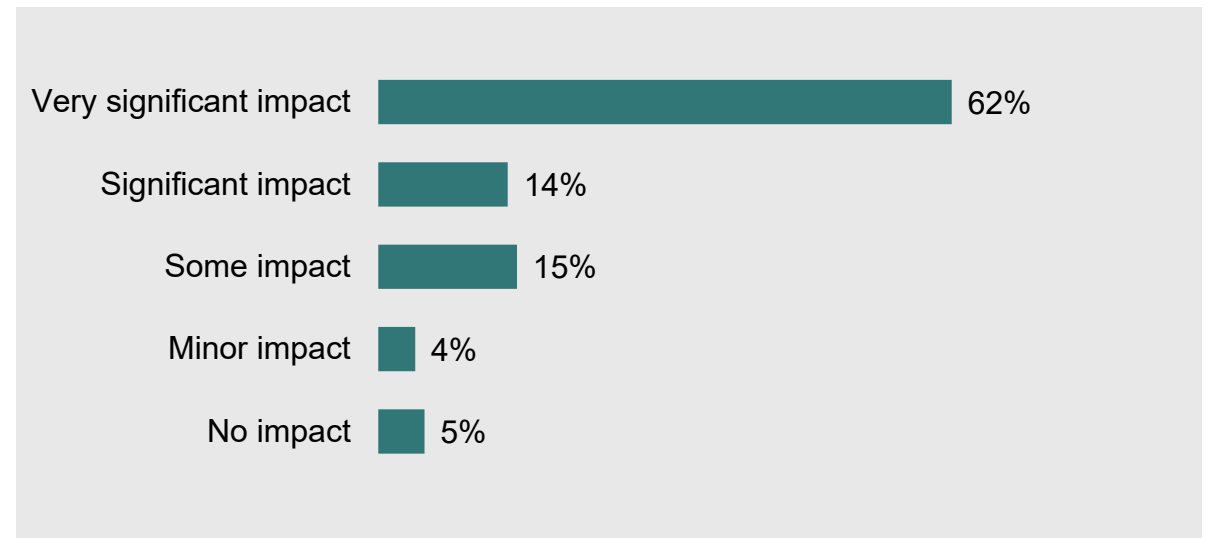
Base: All who provide minibus services (205)

Q82a: In your opinion how much impact have the factors listed below had on the minibus sector driver shortages? Reluctance or inability to give drivers D1 training due to the time it takes to go through the testing process



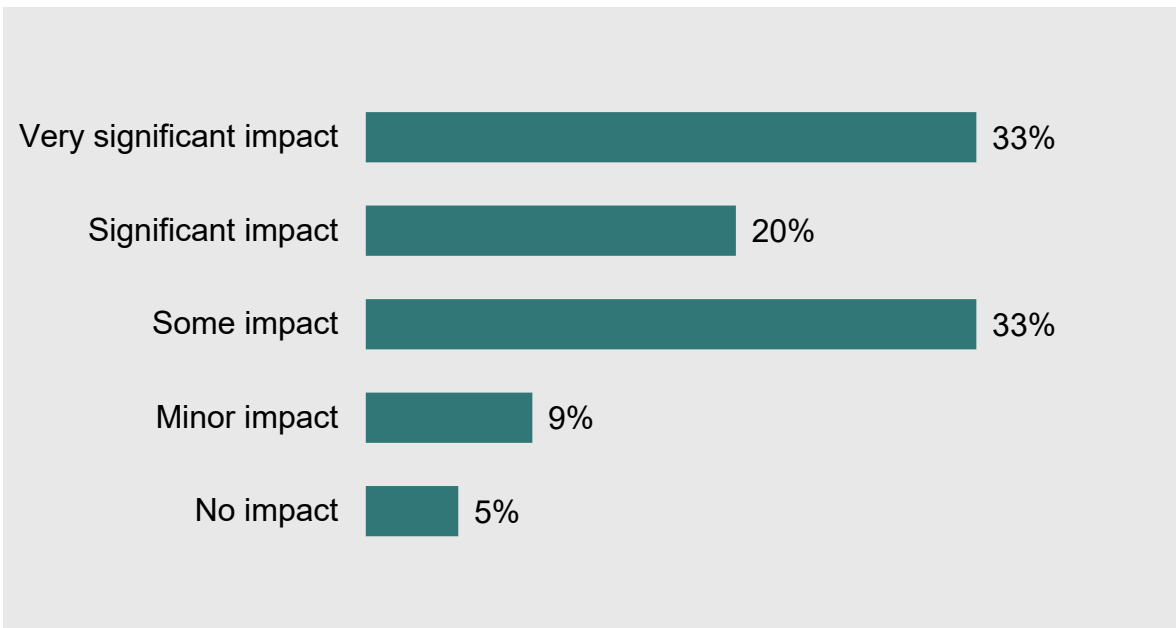
Base: All who provide minibus services and believe there have been driver shortages within the minibus sector (171)

Q82b: In your opinion how much impact have the factors listed below had on the minibus sector driver shortages? Reluctance or inability to give drivers D1 training due to the cost it takes to go through the testing process



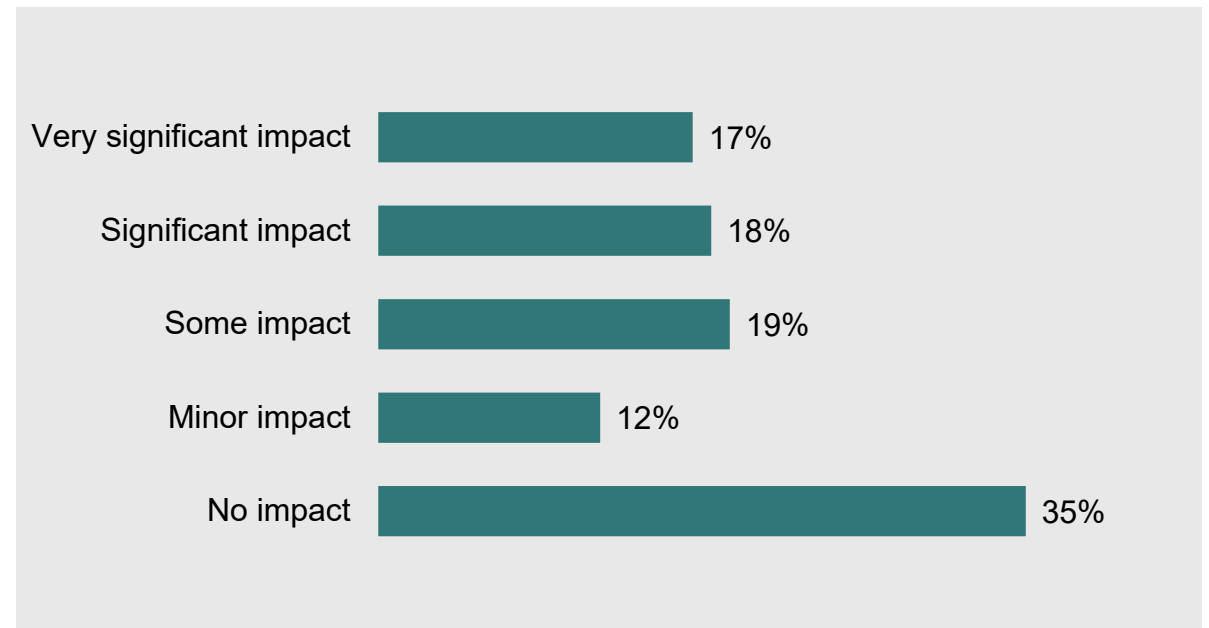
Base: All who provide minibus services and believe there have been driver shortages within the minibus sector (170)

Q82c: In your opinion how much impact have the factors listed below had on the minibus sector driver shortages? Processes required for retaining the licence (regular renewal, medical and conduct requirements)



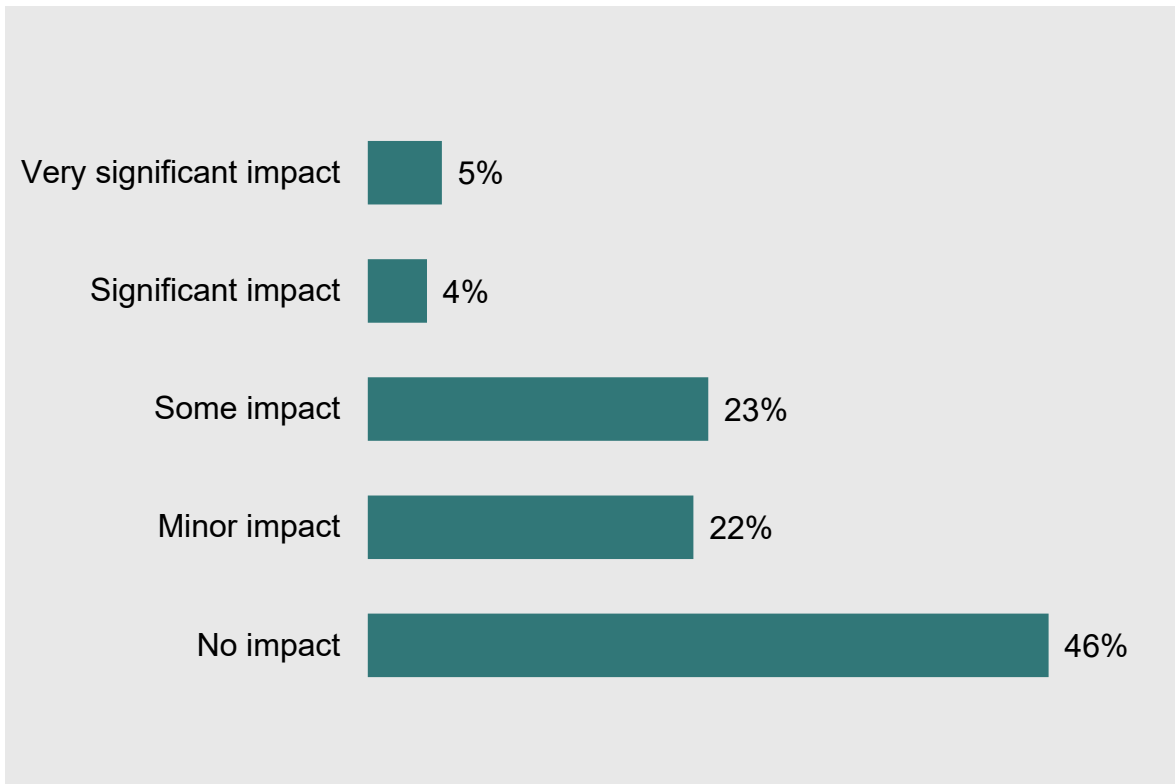
Base: All who provide minibus services and believe there have been driver shortages within the minibus sector (172)

Q82d: In your opinion how much impact have the factors listed below had on the minibus sector driver shortages? Pay



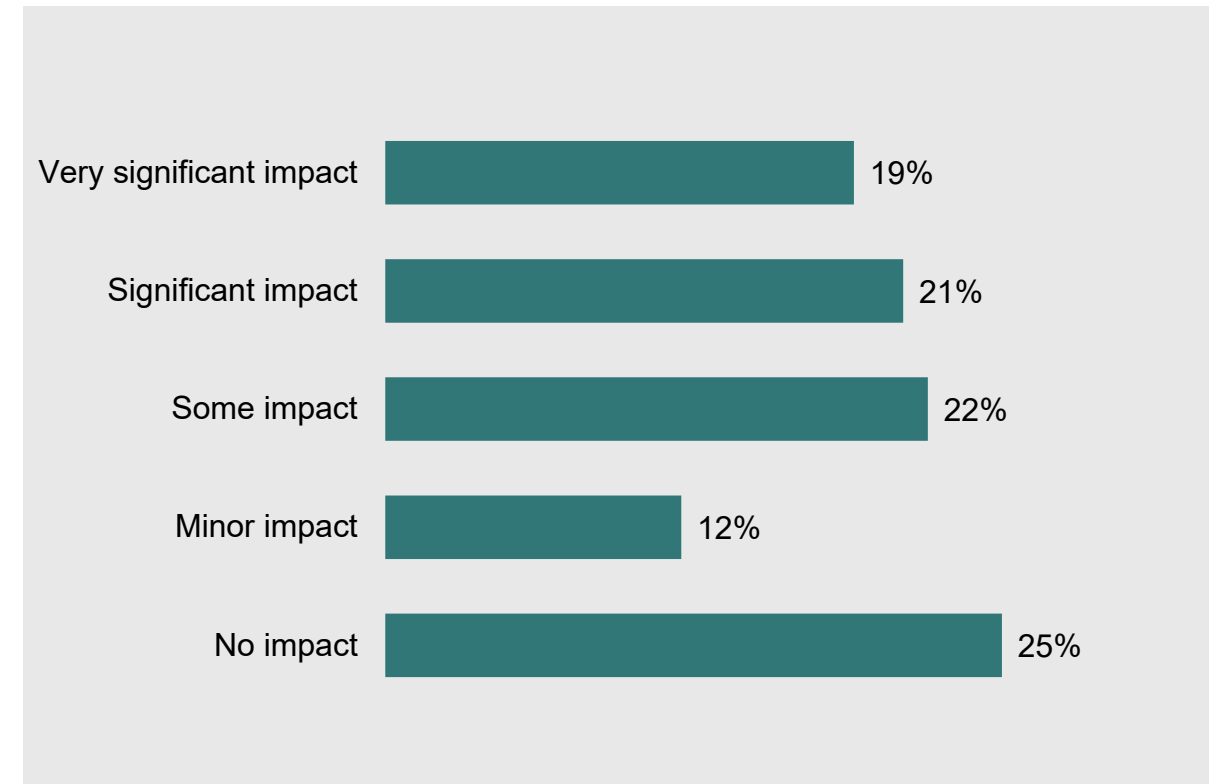
Base: All who provide minibus services and believe there have been driver shortages within the minibus sector (162)

Q82e: In your opinion how much impact have the factors listed below had on the minibus sector driver shortages? Working conditions



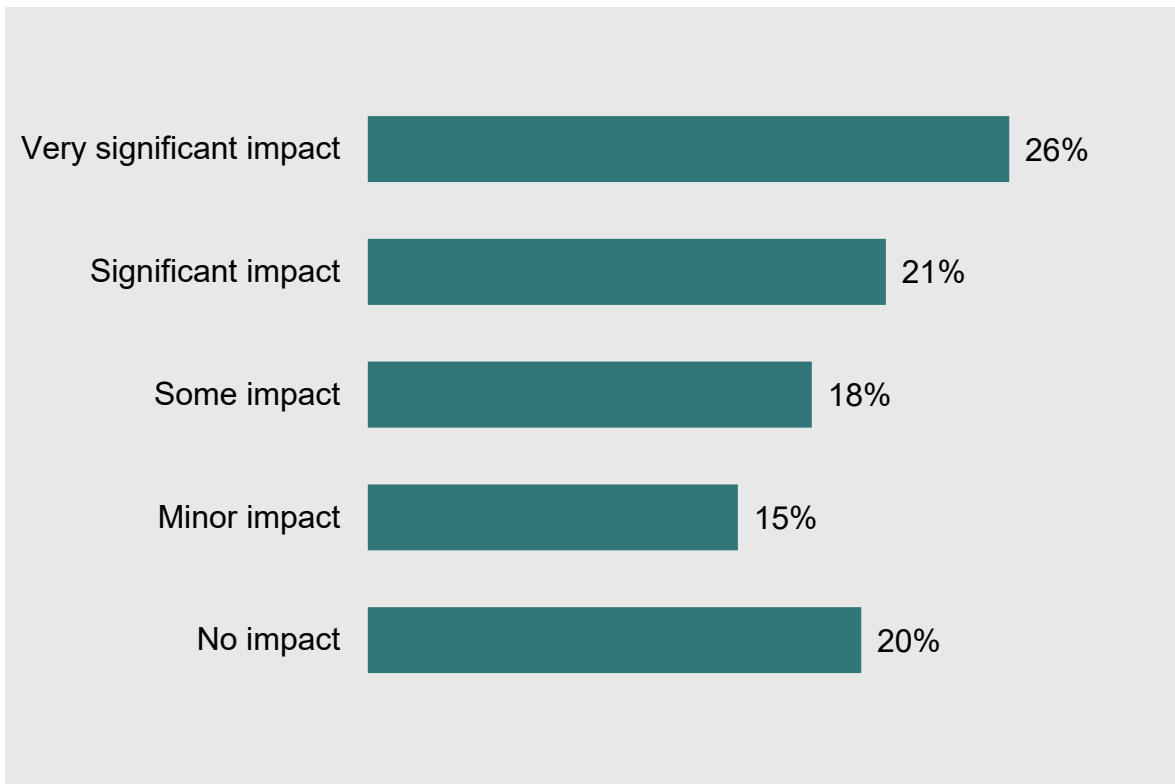
Base: All who provide minibus services and believe there have been driver shortages within the minibus sector (156)

Q82f: In your opinion how much impact have the factors listed below had on the minibus sector driver shortages? A general increase in demand for labour



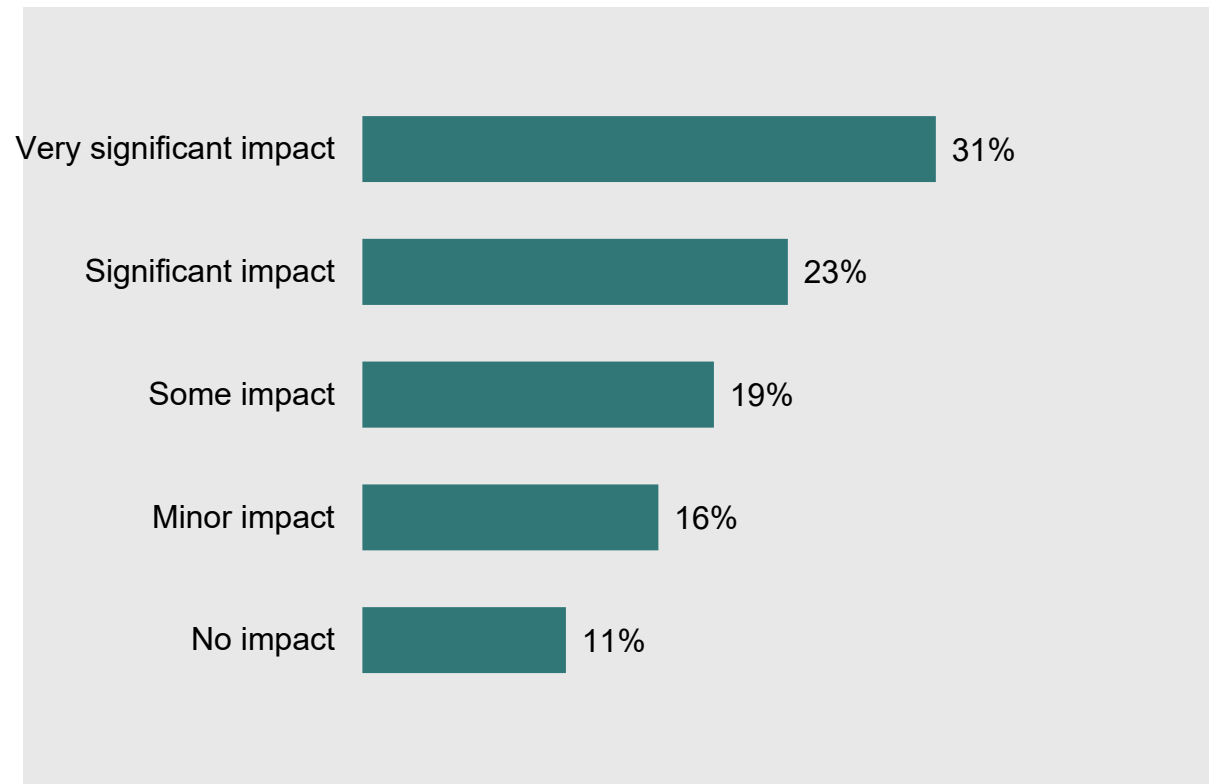
Base: All who provide minibus services and believe there have been driver shortages within the minibus sector (155)

Q82g: In your opinion how much impact have the factors listed below had on the minibus sector driver shortages? Vehicle weight limit



Base: All who provide minibus services and believe there have been driver shortages within the minibus sector (160)

Q82h: In your opinion how much impact have the factors listed below had on the minibus sector driver shortages? Driver age limitations



Base: All who provide minibus services and believe there have been driver shortages within the minibus sector (166)

Q82i: In your opinion how much impact have the factors listed below had on the minibus sector driver shortages? Other reason or reasons (76 consultees made comments)

Examples of what consultees said

“Not having D1 authorisation.”

“Limited employee/volunteer pool.”

“...our work force is getting older and we are getting mass retirements.”

“There is not enough drivers with D1...as the classification was removed on 1997. The pool of drivers available is getting smaller and older. Not all drivers want to drive commercially, entirely happy to drive for non profit organisations.”

“DCPC puts off drivers starting part-time minibus work as a second career after retirement from primary occupation. No one is going to pit themselves through constant retraining for a part time occupation.”

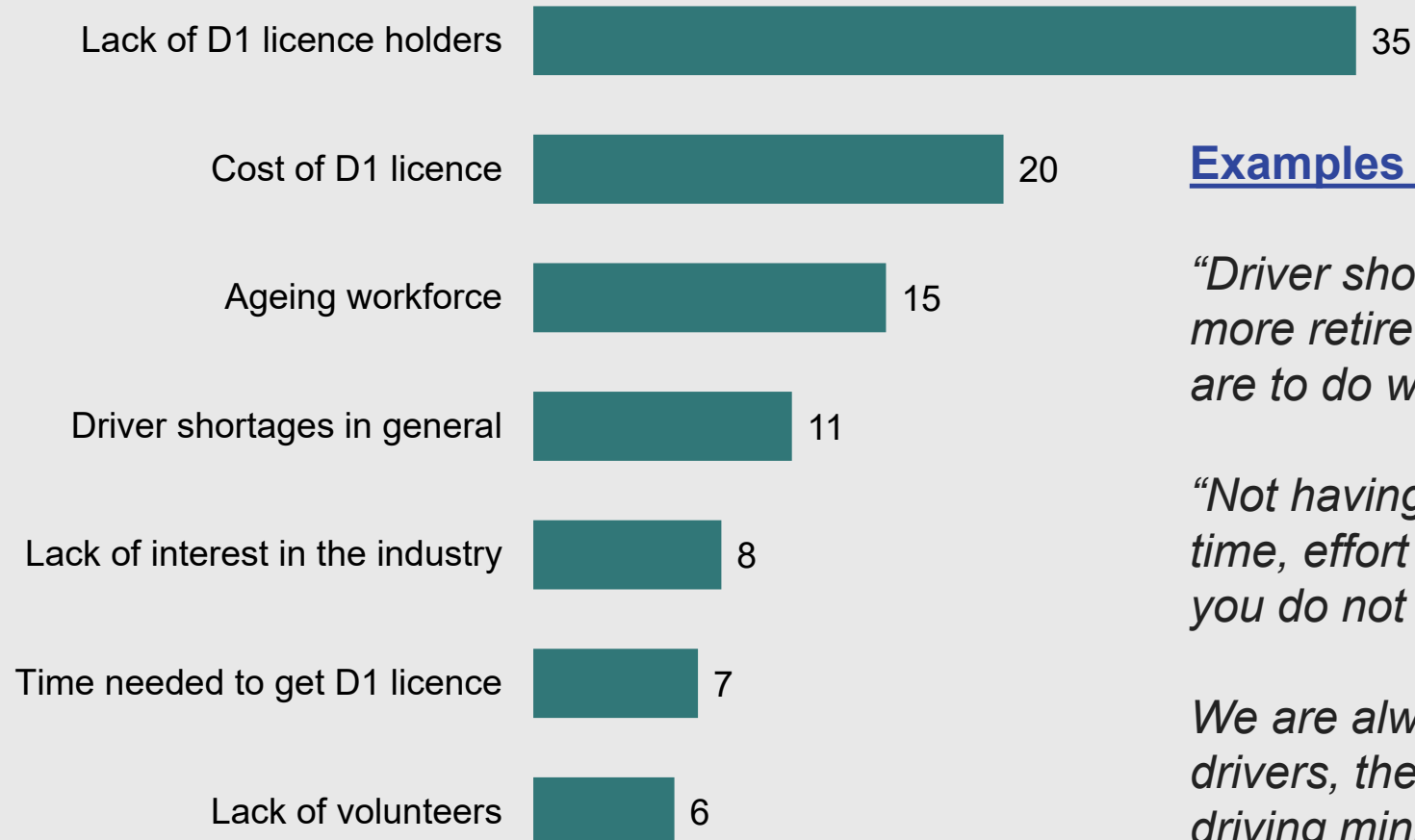
“There is an international lack of drivers across all categories and with the time-limitation of the pre-1997 "grandfather rights" this is seriously reducing the pool of drivers with D1(101) licences. At present there is also insufficient incentive for drivers to independently upskill themselves from B1 to D1. There is a significant risk to employers in training new staff to acquire D1 licences as this opens up other, potentially more lucrative, employment opportunities for those drivers with virtually no way to claim back the costs incurred.”

Base: All who provide minibus services and believe there have been driver shortages within the minibus sector (76)

* Small base size

Q83 Share any views or evidence you have regarding driver shortages

Most frequently made comments



Examples of what consultees said

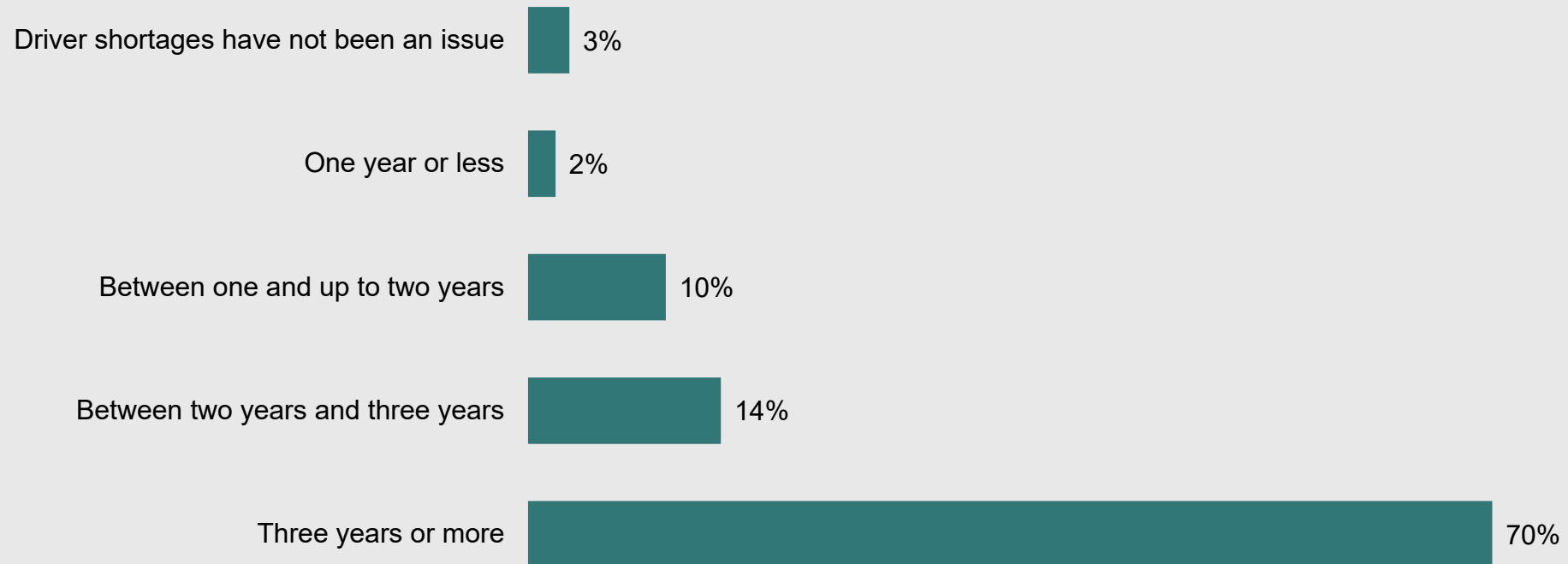
“Driver shortage is an acute problem. The more retired a person is the more likely they are to do work in the voluntary sector.”

“Not having D1 authorisation, including the time, effort and cost involved to obtain D1 if you do not have grandfather rights.”

We are always looking for volunteer minibuss drivers, there are still many myths around driving minibuses e.g. people think you have to have a HGV/PCV licence etc.”

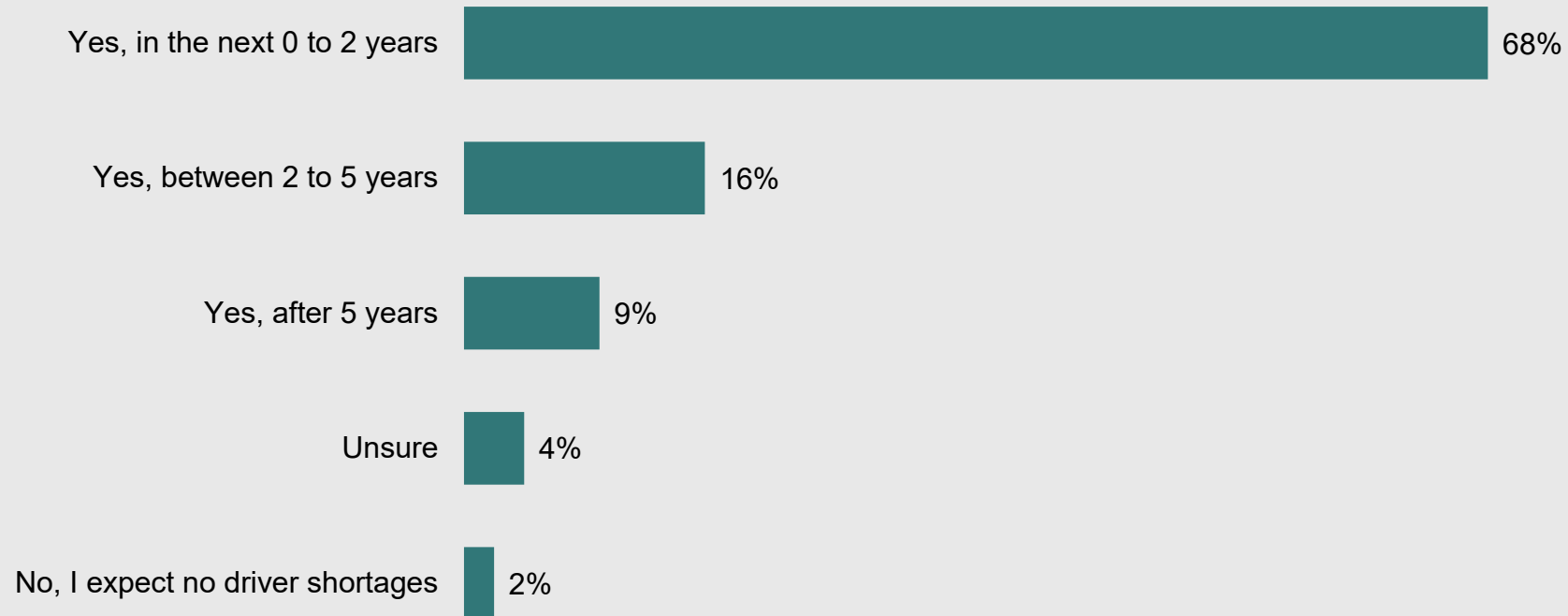
Base: All who provide minibuss services and provided comments about cost savings (76 consultees)

Q84: In your view for how long have industry driver shortages been an issue?



Base: All who provide minibus services and believe there have been driver shortages within the minibus sector (176)

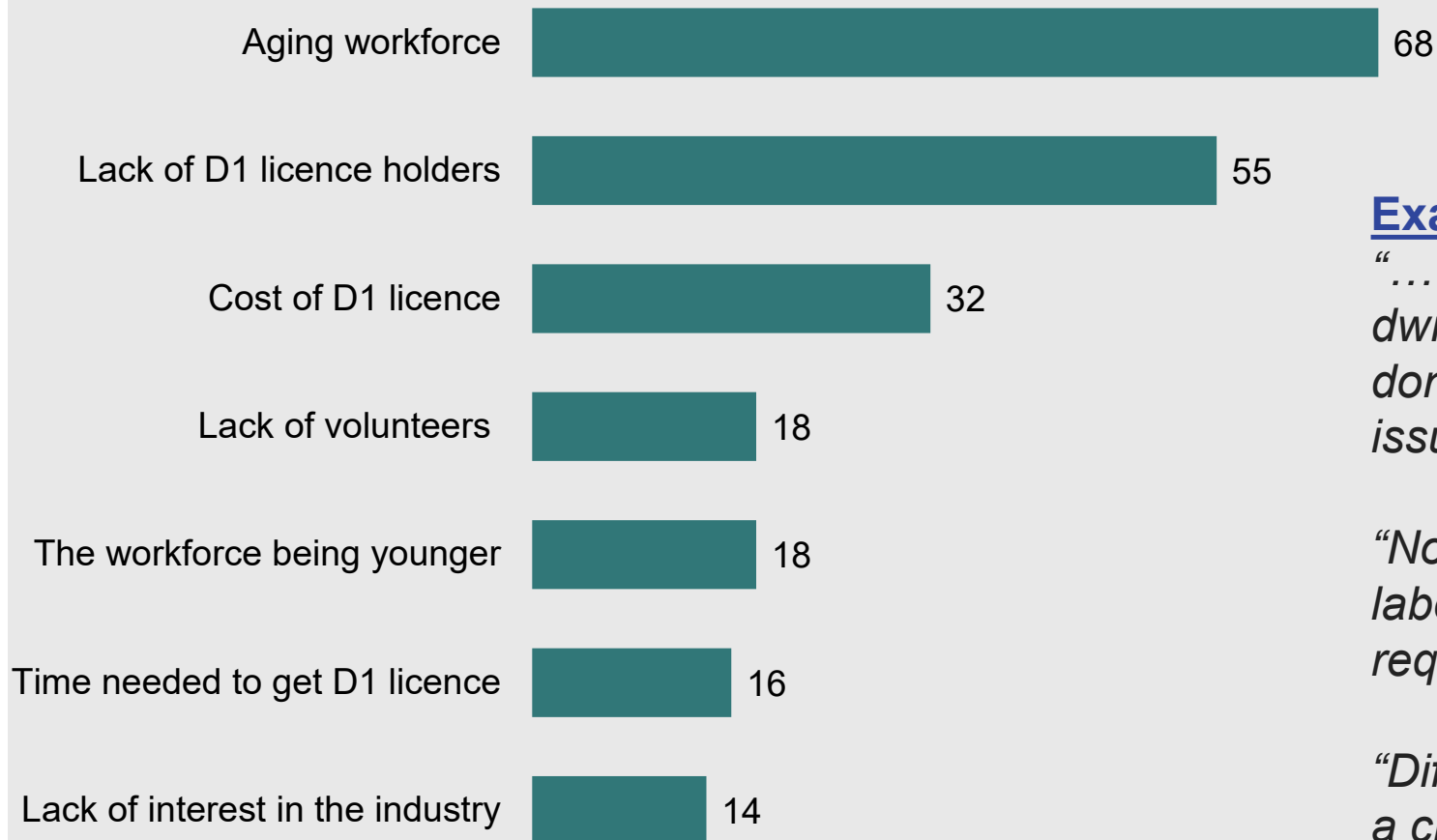
Q85: Do you expect to have a shortage of minibus sector drivers in the future?



Base: All who provide minibus services and believe there have been driver shortages within the minibus sector (184)

Q86 Explain the reasons for your anticipation of future driver shortages?

Most frequently made comments



Examples of what consultees said

“... the pool of available drivers has dwindled since 1997 and nobody has done anything about it or dealt with the issue...”

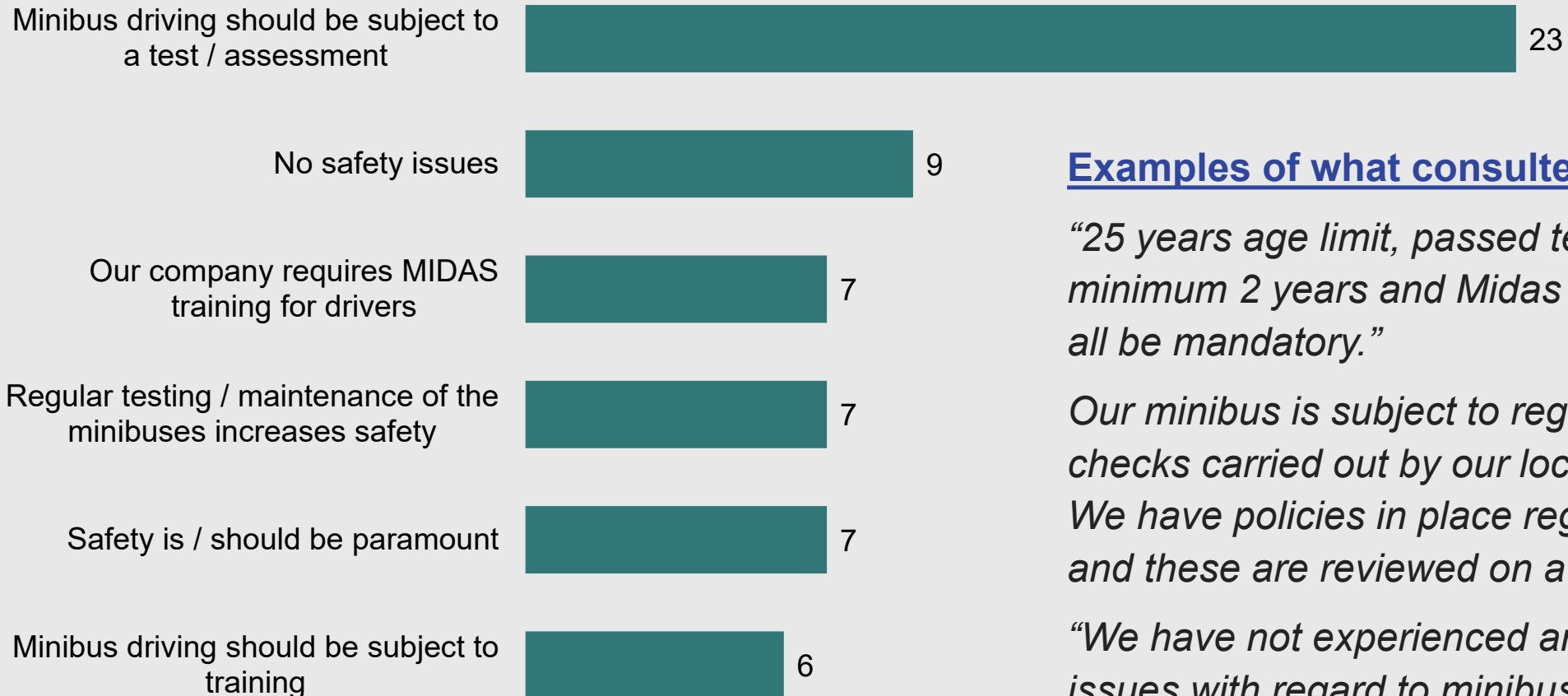
“Not enough employees or available labour locally to meet D1 licence requirements.”

“Difficulty in paying for driver training for a charity, estimated at around £2000 per driver to gain D1.”

Base: All who provided comments about cost savings (159 consultees who run goods transport services by road)

Q87 Share any views or evidence you have regarding minibus safety

Most frequently made comments



Examples of what consultees said

“25 years age limit, passed test for a minimum 2 years and Midas training should all be mandatory.”

Our minibus is subject to regular ten week checks carried out by our local authority. We have policies in place regarding safety and these are reviewed on a regular basis.”

“We have not experienced any particular issues with regard to minibus safety. We follow all the standards expected.”

Base: All who provided comments about cost savings (67 consultees who run goods transport services by road)

Final comments

Final comments

It is good consultation practice to allow participants to provide any other comments they may wish to add. The final question on the questionnaire asked for final comments. Many of those who provided comments tended to repeat what they had said earlier to other questions of the review and won't be repeated here.

The broad themes emerging from other comments included: support for one or more of the proposals and benefits that could be achieved if one or more aspects were implemented.

“Going back to how it used to be before EU regulations strangled and entrenched the UK in paperwork and processing, would undoubtedly have a positive impact on the economy. Introducing Drivers education and testing to the secondary school curriculum would increase The employability options for young people and increase the pool of drivers available to fill the gaps in the UK workforce”

But there was also some criticism and concerns raised about what was being proposed. Some consultees were critical in particular of the review itself.

“To attract more people into the transport industry don't just give licences out to anyone who wants one because, as usual, business picks up the cost and Government can then blame others. We need investment in this country for better driver parking, rest stops...”

“Your survey is asking too much in one survey. This should be broken down. There are lots of issues here which require addressing individually...”

Appendices

Supporting documentation / evidence provided by consultees

Supporting evidence provided by consultees

As part of the licensing review, consultees were asked to provide evidence for their views at ten questions on the questionnaire. These questions are included below for reference. Some of those who provided evidence did so at one or more of these questions via a weblink, photograph or other document. Others provided evidence at other questions and in offline responses. Where evidence was submitted, this is included in the next section of this report.

- 13. Supply evidence of any benefits that could be realised from the C1 licence proposal?
- 14. Supply any evidence you have that that C1 licence proposal would have a negative or positive impact upon road safety?
- 27. Supply evidence of your opinion (for example business, road safety and C1 vehicle use)
- 30. Supply evidence of your opinion (for example business, road safety and C1 vehicle use)
- 37. Supply any views and evidence you have on whether this change would have a negative or positive impact upon road safety?
- 49. Supply any views and evidence you have on if this change would have a negative or positive impact upon road safety?
- 52. Supply any views and evidence you have on if this change would have a negative or positive impact upon road safety?
- 60. Supply any evidence or comments regarding these regulations?
- 83. Share any views or evidence you have regarding driver shortages
- 87. Share any views or evidence you have regarding minibus safety.

Supporting evidence provided by consultees

Most of those who responded to the review did not substantiate their views and opinions with any documented evidence. However, some consultees did provide weblinks to supporting information including road safety statistics. Others provided weblinks to photographs/pictures and other documents and these are included here for reference along with the question number that the responses were provided to. Some of those who provided weblinks did not work and as such are not listed here.

Q37. Supply any views and evidence you have on whether this change would have a negative or positive impact upon road safety? Comments

DVSA's own figures succinctly state the accidents & incidents. With D1 it's people's lives at stake. I can't see any positives, only negatives. You've only got to Google M4 Minibus accidents to get loads of data one that springs to my mind is the 14 children killed

Supporting evidence provided by consultees – photographs submitted

Driver Certificate of Professional Competence (DCPC)

Q25, Q26 and Q27. Do you think there are specific purposes of driving of C1 vehicles that should be exempted from DCPC for driving in the UK? If yes, what purposes and supply evidence of your opinion (for example business, road safety and C1 vehicle use)

This is my towing combination, I tow only because I can't currently afford to do the C1 licence. Ideally I'd have a lorry to take my horse to competitions, they're safer and much more practical. I'd not be using the lorry for any other purpose. Using a lorry for private purposes will likely not come even remotely close to the driver hours clocked up by professional drivers.

Instead of having 1 vehicle with a greater pay load than 3.5 ton, I would instantly plan to upgrade all vehicles. I would then instantly gain higher productivity.

For utilities arboriculture a 7.5t vehicle is essential for safely carrying the weight of waste product created during the working day but due to the nature of the job, operating within current DCPS regs is simply not possible.

Supporting evidence provided by consultees – photographs submitted - continued

Driver Certificate of Professional Competence (DCPC) - continued

Q28, Q29. and Q30. Do you think there are specific groups of drivers of C1 vehicles that should be exempted from DCPC for driving in the UK? If yes, Which groups? Supply evidence of your opinion (for example business, road safety and C1 vehicle use).

Private use, eg motor homes, caravans, horse boxes, large vans. 3850kg small horse box

Ambulance driver. I currently work for WAST and drive a 3.5 tonne vehicle but need the C1 to drive the bigger vehicles

Private use. Agricultural use. Forestry use. Arboriculture use. Utilities use. A 7.5t vehicle such as the one pictured is essential for safe arboriculture / forestry business use but due to the nature of the job, operating within current dcps regs simply is not viable.

Supporting evidence provided by consultees – photographs submitted - continued

2012 driving regulations

Q60. Supply any evidence or comments regarding these regulations?

Take a look at the roads (A64, A1237, A19) around York and you will see blatant disregard for tractor/trailer laws. Almost every tractor is doing 30mph, 50% over the speed limit in most cases. Grain being moved to store, mostly at harvest, in trailers massively over the weight limit. 16t (carry) trailers are common, I heard of one carrying 23t of Oilseed Rape (gvw 40t) which is downright dangerous when the trailer was only rated at 18t (carry) and legally only able to carry around 12t, taking into account the unladen weight. Maize and the resultant digestate liquid from AD plants/root crops being carried for long distances, 30 or 40 miles, is clearly sidestepping the use HGVs and the legislation that entail. Enforcement is the key

Supporting evidence provided by consultees – other documents submitted

Driver Certificate of Professional Competence (DCPC)

Q25, Q26 and Q27. Do you think there are specific purposes of driving of C1 vehicles that should be exempted from DCPC for driving in the UK? If yes, what purposes and supply evidence of your opinion (for example business, road safety and C1 vehicle use)

The existing problem is that the C1 covers from over 3500kg upwards. As there is little difference in driving behaviours between a 3.5.t vehicle to as high as a 5t vehicle, the threshold of requiring a CPC on anything over 3500kg is flawed and the changeover from B1 to C1 should be adjusted. C1 and DCPC should ideally kick in on vehicles at a GVW of 5000kg and above or, as precedent at 4250kg already exists for driving a minibus on a car licence with 16 passengers, opt. for the 4250kg figure.

Current regulations permit the following: A category B car licence holder to driver a minibus with more than 9 seats, up to 16 seats, with a gross weight up to 4250kg so long as this is on a voluntary basis and the driver is over 21 yrs old, along with having held their cat B for at least 2 years DVLA document INF28 A category B car licence holder may drive a commercial vehicle up to 4250kg so long as it is alternatively fuelled, so long as this is for commercial purposes and that they must not tow Attached SI 2018784As such, the above conditions go to show that a cat B car holder is quite capable of driving up to 4250kg under conditions that would need greater care (minibus) than would be expected for a standard delivery van or motorhome over 3500kg.

Supporting evidence provided by consultees – other documents submitted - continued

Driver Certificate of Professional Competence (DCPC)

Q25, Q26 and Q27. Do you think there are specific purposes of driving of C1 vehicles that should be exempted from DCPC for driving in the UK? If yes, what purposes and supply evidence of your opinion (for example business, road safety and C1 vehicle use)

*For leisure purposes. I have a motorhome which is a converted minibus reclassified by DVLA as a van with windows. This is not a commercial vehicle and the weight of the lithium batteries and solar power system means that although the unladen weight is only 3200kg there is a unnecessary limitation on the vehicles usage. Evidence is a copy of my C1 vehicles insurance cover note. **Link to insurance document provided by consultee not included here given personal data.***

Supporting evidence provided by consultees – other documents submitted - continued

Driver Certificate of Professional Competence (DCPC)

Q25, Q26 and Q27. Do you think there are specific purposes of driving of C1 vehicles that should be exempted from DCPC for driving in the UK? If yes, what purposes and supply evidence of your opinion (for example business, road safety and C1 vehicle use)

Leisure use. There is a huge problem on the horizon for the motorhome industry, with a shrinking market of drivers for motorhomes that are plated over 3500kg. The push to keep motorhomes under 3500kg has also led to vehicle being built with lightweight, flimsy materials. A better built motorhome which weighs 4000kg would be much safer. At the moment only drivers aged approx 4470 can drive motorhomes over 3500kg without the additional test and in many areas of the UK, it's far too difficult and costly to take a test for leisure vehicle use. It's also very confusing for drivers of vehicles, trying to check payloads, avoiding 'overloading' vehicles to keep under 3500kg, when in reality, the vehicle chassis could easily cope with extra weight and be safely plated to 4250kg.

This article with common questions about downplating motorhomes might help give an insight into how confusing it can be for people to monitor motorhome weights.

Supporting evidence provided by consultees – other documents submitted - continued

Driver Certificate of Professional Competence (DCPC)

Q25, Q26 and Q27. Do you think there are specific purposes of driving of C1 vehicles that should be exempted from DCPC for driving in the UK? If yes, what purposes and supply evidence of your opinion (for example business, road safety and C1 vehicle use)

Emergency Service vehicles. All current C1 Trust drivers are required to undertake the above course to meet a satisfactory level of entry with additional annual updates and five yearly refresher programmes to ensure competence is maintained. In addition, all parties who do not drive for a period in excess of three calendar months must complete a refresher prior to re commencement operationally.

Supporting evidence provided by consultees – other documents submitted - continued

Driver Certificate of Professional Competence (DCPC)

Q25, Q26 and Q27. Do you think there are specific purposes of driving of C1 vehicles that should be exempted from DCPC for driving in the UK? If yes, what purposes and supply evidence of your opinion (for example business, road safety and C1 vehicle use)

I feel as though student paramedics, training ambulance road personnel shouldn't have to pay an additional lump sum of money on top of their training fee's in order to be able to carry a C1 licence. Many years prior to 1997 when the licence was changed, ambulance staff didn't require C1 examinations prior to employment. To this day in the ambulance service there is still a significant number of staff members that haven't required a C1 examination however have completed advanced driving as required through the service.

As you can see...paramedics, ambulance personnel have to go through extreme amounts of training and long hours in order to gain their role as an emergency services clinician. Aside from this they also have to go through the challenge and anxiety of completing another driving exam before they can be accepted into employment. This unfortunately reduces the number of people in who are interested in the job role, thus being because they don't have the correct driving licence qualification and are unable to afford to have it added onto their licence.

Supporting evidence provided by consultees – other documents submitted - continued

Driver Certificate of Professional Competence (DCPC)

Q28, Q29. and Q30. Do you think there are specific groups of drivers of C1 vehicles that should be exempted from DCPC for driving in the UK? If yes, Which groups? Supply evidence of your opinion (for example business, road safety and C1 vehicle use).

Emergency ambulance service. This is what is faced daily at work (personal data excluded).

URGENT: CATS + NTS SHIFT CO...
Hi All, We are desperately in need of the below shift cover for the CATS and NTS contract. If you can offer any assistance, please contact the Ops Centre as soon as possible. Cover Required: CATS
Role Required: EAC and above
Driving Status: Response C1 Other
Details: Shift from Great Ormond Street. Sign off needed for this contract
Cover Required: NTS
Role Required: EAC and above
Driving ...

Supporting evidence provided by consultees – other documents submitted - continued

Against D1 requirement removal

Q37. Supply any views and evidence you have on whether this change would have a negative or positive impact upon road safety?

The attached file contains evidence related to factors across the call for evidence and also other related road safety matters highlighted in analysis of a sample of ten fatal road traffic collisions that occurred in Cambridgeshire between 2018-2020. The methodology, results and recommendations to date are briefly outlined in the attachment.

(Document provided to DfT but not included here as contained personal data).

Supporting evidence provided by consultees – other documents submitted - continued

Offline response

We note that the government, Transport for London and others have produced extensive studies regarding freight consolidation, consolidation centres, last mile hubs etc. A key element in the studies is the question of land allocation for consolidation centres which is a matter for government and local authorities as well as industry. Given the option of access to consolidation centres and more efficient logistics the freight industry may well prefer the option of fewer trips to achieve the same distribution of goods to the option of more vehicles and more drivers which invariably carries a greater cost to business.

It may well be that employers responding to the consultation opt for employing unqualified drivers who may offer lower costs but they are not being asked to consider other solutions, such as convenient and affordable access to consolidation centres, to the current shortage of drivers.

LCC's Climate Safe Streets report drew on the range of studies of freight consolidation.

Supporting evidence provided by consultees – other documents submitted - continued

Offline response

Good afternoon.

I attach a completed Driver Licensing Call for Evidence response form and an accompanying narrative. This is the response from the National Register of LGV Instructors (NRI) who currently operate a voluntary register of LGV Instructors. The narrative contains a summary the background and operations of NRI, which is managed by RTITB Ltd on a not-for-profit basis.

The narrative explains our responses to questions 41-46, drawing on views and evidence from 30 NRI-registered LGV instructors shared with us earlier this month as well as our own staff tteam.

The NRI website, which contains the live register of instructors is: <https://lgvinstructorregister.com/>

