

## **Summary**

DfT and DSA hosted a meeting for representatives from the bus and coach and road transport industries, and other sectors impacted by the Driver CPC rules. A list of attendees is at Annex A.

The purpose of the meeting was to discuss the European Commission's review of DCPC and to inform an official government response.

The key points arising were:

- The majority in the freight and passenger transport industries has become increasingly familiar and less dis-satisfied with the current arrangements for DCPC, which had developed over the past five years.
- Initial qualification should remain on the basis of tests, which were aligned to the acquisition tests.
- Flexibility in the arrangement and content of period training should be retained. There was concern that a specified, uniform syllabus defined at a European level could undermine current high standards in GB.
- There would be support for greater flexibility to be applied to enable periodic training courses to be delivered in periods less than seven hours, (e.g. 2 x 3.5 hours).
- There was some support for the ability to include an element of assessment within the 35 hours accredited training to review learning outcomes but not for pass / fail testing.
- DCPC should apply to all professional drivers carrying a load or passengers, including those driving buses under s19 or s22 permits. Although some called for greater clarification in the existing exemptions about what is included in the definition of 'professional driver'.
- There was concern from some sectors where haulage or passenger transport was not the main activity that the requirements were a disproportionate burden for "incidental" drivers.
- There was a risk that aligning DCPC exemptions with those provided under Regulation 561/2006/EC would take a large number of drivers out of scope of DCPC, including many drivers of local service buses.

## **Introduction**

A call for evidence, based on the Commission's own questionnaire, had been issued by DSA. A summary of responses received to date was shared with the meeting (slides at Annex B).

For this meeting, discussion was focussed on four key themes:

- Harmonisation of the initial qualification and periodic training
- Mutual recognition of the driving profession across member states
- Scope of the application of the rules to particular driving activities and classes of driver, and of exempted activities
- Content and organisation of periodic training

The main issues arising are summarised below.

### **Key Discussion Points:**

#### 1. Harmonisation

The current wording of Directive (ref), which sets out the DCPC requirements provides for two options for drivers to attain their initial DCPC qualification – (i) attendance of a training course and test or (ii) successful completion of tests. In GB, the second of these options has been adopted, so that the attainment of the initial qualification is aligned to the category C and D licence acquisition tests.

This position is widely supported and industry representatives would wish for it to be retained; seeing many benefits for drivers and their employers. A training route was considered to present significant disincentives to the recruitment of new drivers, not least ones of cost and of delay to entry to the workforce.

Concern was expressed that harmonisation to a common European model, if not based on GB best practice, would lead to a degradation of standards.

Similarly, the notion of a uniform European syllabus for periodic training was not supported. The flexibility for drivers and employers to arrange training to address identified individual development needs was a welcome feature of the current arrangements. The industries affected by DCPC have diverse needs. A specified, uniform syllabus beyond what was already prescribed in Annex I of the Directive risked omitting essential elements because a syllabus could not be all encompassing. It also risked mandating courses that were irrelevant for particular drivers' activities.

It was acknowledged that little value might be derived from the repeat attendance of a training course merely to satisfy a minimum training requirement but it was noted that there are legitimate reasons when courses should / must be repeated (e.g. first aid). Or where refresher training of a

relevant course is more constructive than attendance of a course of little relevance. Regulating against course repetition was therefore not supported. Instead, it was suggested that there should be better self-regulation by drivers and their employers to ensure that training undertaken is relevant to their particular needs.

It was also suggested that a specified European syllabus would require regular review, to ensure that it remained up to date with industrial and technological advances. This would involve significant resources both at the Commission level and within individual member states to make frequent amendments to domestic legislation.

Further harmonisation of the qualification process and periodic training would therefore not be welcomed by those industries affected. There was, instead, support for maintaining the existing arrangements, with minor changes to the domestic administrative arrangements for the approvals and quality assurance of training courses.

The commission's review seeks comments and evidence about the mutual recognition of DCPC training. This was not considered to be a major issue at present, though it was noted that some countries did not always recognise partially completed periodic training (e.g. Republic of Ireland and Finland).

## 2. Scope

The Commission's review seeks comments and evidence on whether the current scope of the DCPC scheme should be extended to other classes of drivers with category C or D licences, or to drivers of goods and passenger carrying vehicles that require other categories of driving licence (e.g. taxis).

It was noted that NI were consulting about the introduction of a mandatory testing and periodic training requirement for taxi drivers.

Views on the broad question were mixed. There were arguments in favour of all drivers of laden goods and passenger carrying vehicles (in categories C and D) to be within scope, as the principal objective of DCPC was to improve road safety. The current arrangements meant that in some circumstances the same vehicle could be driven on the same journey, with the same load, but in one instance might require the driver to hold DCPC and in another for that not to apply.

Counter arguments were made for continuing to exempt those who were not "professional drivers"; suggesting that making them subject to DCPC would be overly burdensome. A clearer definition of "professional driver" would be welcomed by all. There was some concern that those for who driving was incidental to their main duty should not be subject to the DCPC requirements.

The balance of argument favoured DCPC applying to all professional drivers of category C and D vehicles carrying a load or passengers, including those

driving on s19 and s22 permits. The extension of DCPC to drivers of light vans (those driven on category B licences) was not supported.

### Exemptions

The Commission's review seeks views and evidence about the exemptions provided for within the Directive. In particular, it asks whether the exemptions should be aligned to those provided under Regulation 561/2006/EC, which specifies the use of tachographs and drivers hours.

DCPC was intended to improve road safety and to raise standards within the road transport industries. It was, therefore, suggested that exemptions should be limited, so as to achieve the greatest benefits. But there were concerns from some sectors that exemptions should provide for all for whom driving was incidental to their main job.

Alignment with Regulation 561/2006/EC would potentially put some 90,000 local bus service drivers out of scope. This was not supported.

Class exemptions were suggested for those in other industries (e.g. agriculture) who drove large vehicles only occasionally and incidentally to their main profession. DCPC might impose a burden on such drivers but the point was made that those who only drive occasionally could be a greatest need of refresher training.

Also, extending the range of exemptions would mean that the costs of administering the scheme and providing training would fall on a smaller cohort and therefore be more expensive to those who remained in scope.

It was suggested, though, that the Commission could, through its review, provide greater clarity of what driving activity was intended to be in scope and what was to be exempted.

### Periodic training

The Commission's review seeks views and evidence about the provision of periodic training – how the 35 hours should be fulfilled, whether there should be mandatory topics, and how course provision should be quality assured.

In GB, we have adopted a flexible system where drivers can undertake training at any point within a five year cycle, in blocks of at least seven hours. This was welcomed and supported industry representatives. It was noted that other member states have more prescriptive regimes, for example requiring annual training or training to be undertaken in a single 35 hour block. Either arrangement could already be undertaken by drivers in GB, if that met their requirements, without further regulation.

In discussion, it was suggested that GB seek further flexibilities; for example, to provide for training courses to be arranged in periods shorter than seven hours, and for training to include an element of assessment within the specified time period. (It was acknowledged that shorter training course durations would have implications for the course approvals and quality assurance regime.) It was suggested that Commission officials had given informal advice that this might be permissible within the existing terms of the Directive but that was contrary to previous official exchanges on the matter.

There was interest expressed in making future provision for the accreditation of e-learning courses for DCPC. Precedent had been set in other arenas (for example, the delivery of Open University courses.)

It was acknowledged that there were interests who would lobby for particular issues to be mandated (e.g. vulnerable road users). But, as discussed earlier in proceedings, the suggestion of a uniform mandated syllabus was not supported.

Finally, participants were asked for views on what additional points should be given consideration in making DCPC work better for the transport industries in GB.

One of the aims of DCPC was to engage young drivers into the professions. The Commission's review sought views and evidence on whether a staged access programme would help to engage young people. In GB, a national vocational scheme already operated for drivers aged 18 years or older but this had attracted little take up.

There were some concerns that the costs of insurance were a barrier to the recruitment of young drivers. Others, though, suggested that the insurance industry should be assured of young drivers who have been through the same rigorous qualification process as other drivers.

It was also suggested that literacy and numeracy deficiencies in the workforce (which was traditionally low in formal educational attainment) could be addressed through DCPC.

## **Annex A - Attendees**

Alec Horner	Minimise Your Risk
Amanda Brandon	BVRLA
Ben Ellis	NFU
Brian Morrison	DVA
Christopher Grice	Stobart Group
Gill Green	VOSA
Guy Gibson	Trent Barton
Jack Semple	RHA
James Firth	FTA
Peter Grazier	People 1 <sup>st</sup>
Peter Hearn	VOSA
Steve King	White Logistics
Steve Smith	CPT
Duncan Price	DfT
Bob Hannigan	DSA
Kath Jackson	DSA
Peter Weddell-Hall	DSA
C Yarsley	FTA
S Ashley	Stobart Group
D Scarlet	Nottingham City Transport