



Driving  
Standards  
Agency

# Review of the Driver Certificate of Professional Competence

A report on the call for evidence about the effectiveness of Driver CPC so that the UK government can respond to an assessment being run by the European Commission.

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## Glossary

Item	Definition
ADI	Approved Driving Instructor
Category C	Lorries
Category D	Bus and coaches
DCPC	Driver Certificate of Professional Competence
DSA	Driving Standards Agency
DfT	Department for Transport
Regulation 561/2006/EC	European legislation setting out the EU rules for maximum daily and fortnightly driving times, as well as rest periods
SoS	Secretary of State for Transport
The Directive	Directive 2003/56EC – the European Directive that introduced the Driver Certificate of Professional Competence

## Executive summary

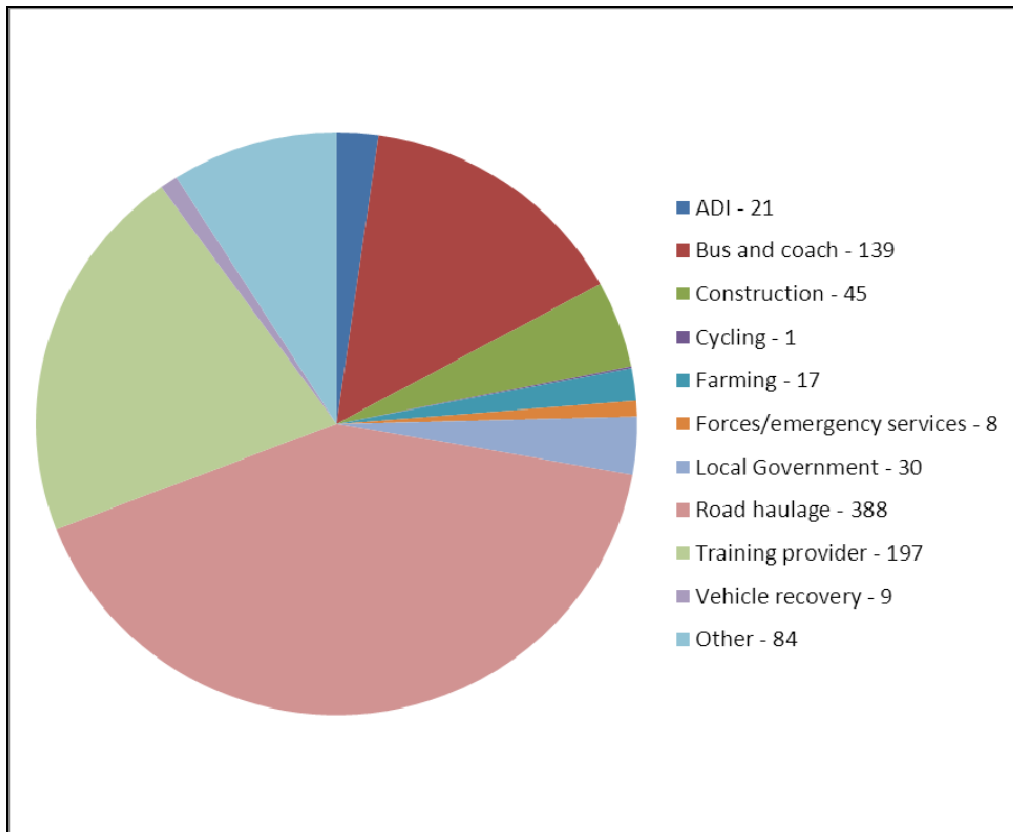
1. The Driver Certificate of Professional Competence (DCPC) was introduced throughout the European Union by Directive 2003/59/EC. The aim of DCPC is to raise the standards of new drivers and to maintain and enhance the professionalism of existing lorry and bus drivers throughout the European Union, through a continuous update of their capabilities.
2. The European Commission is consulting about how well DCPC has met its aims, how it might be adapted and how, potentially, its scope could be extended to drivers of other classes of vehicles.
3. On 4 September 2013, DSA published a questionnaire seeking views on the Commission's areas of assessment. We also requested evidence demonstrating the effect the current scheme has already had or evidence of the potential costs and benefits of the proposed changes. The survey closed on 16 October 2013.
4. The responses provided will be used to inform a formal response to the Commission from Her Majesty's Government.

## Disclosure of information

5. As part of the survey, we made a commitment that, at the end of the consultation period, we would publish the responses received unless the respondents made clear their responses were to be treated as confidential.
6. No respondents asked for their response to be treated as confidential.
7. This report summarises comments received and does not identify specific respondents. The statistical analysis includes replies from all respondents who indicated the strength of their support for each of the proposals. Not all respondents commented on every proposal or replied to every question. Some respondents only provided general comments and did not indicate the strength of their support or disagreement.

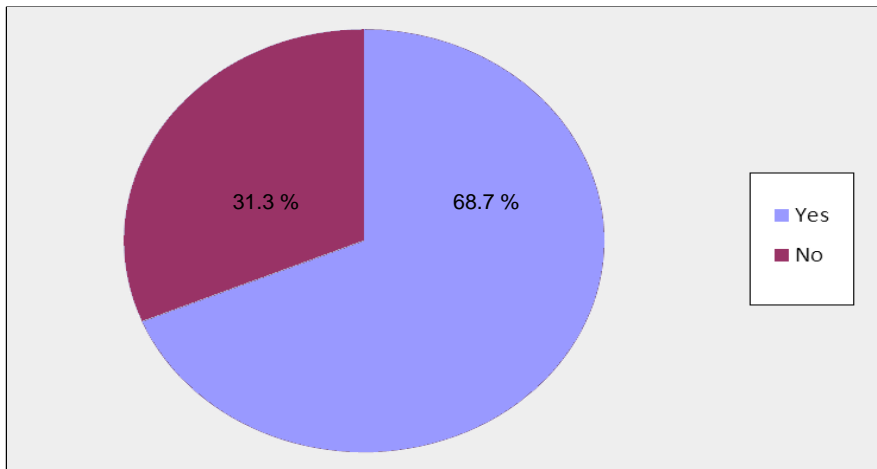
## Responses to questionnaire

8. The survey received **1,318** responses, however only **549** people - around 42% - completed it in full. Responses were received from a number of organisations, including the Freight Transport Association, National Farmers Union, Nottingham City Transport and Trentbarton Buses.
9. The chart below shows the industries or sectors which those who responded work in:



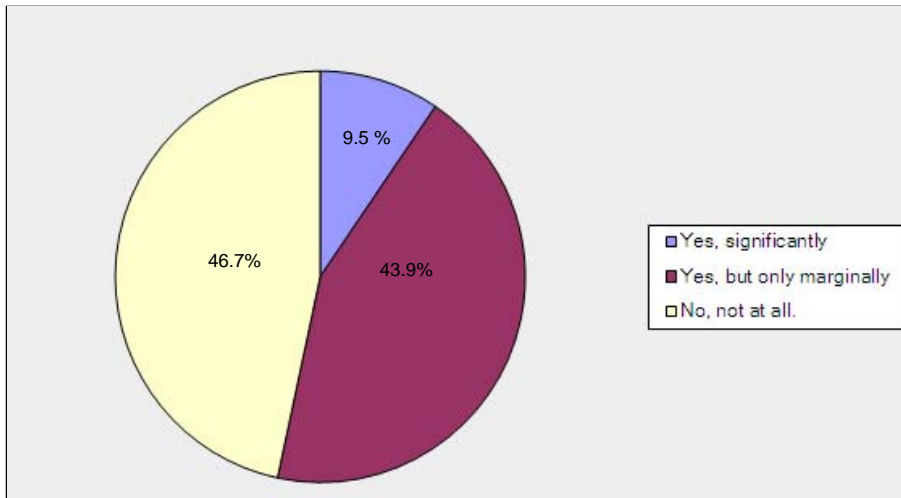
10. **960 people** answered the question about whether their organisation employs large vehicle drivers who drive in other European Member States. **232 people**, around 24%, of respondents answered yes, while **728 people**, around 76%, said they did not.

**Question 6 - Do you think that the establishment of a common framework for the training and the testing, further harmonisation of the content of the training and the setting of common requirements for training centres and instructors could further contribute to the objectives of the Directive?**



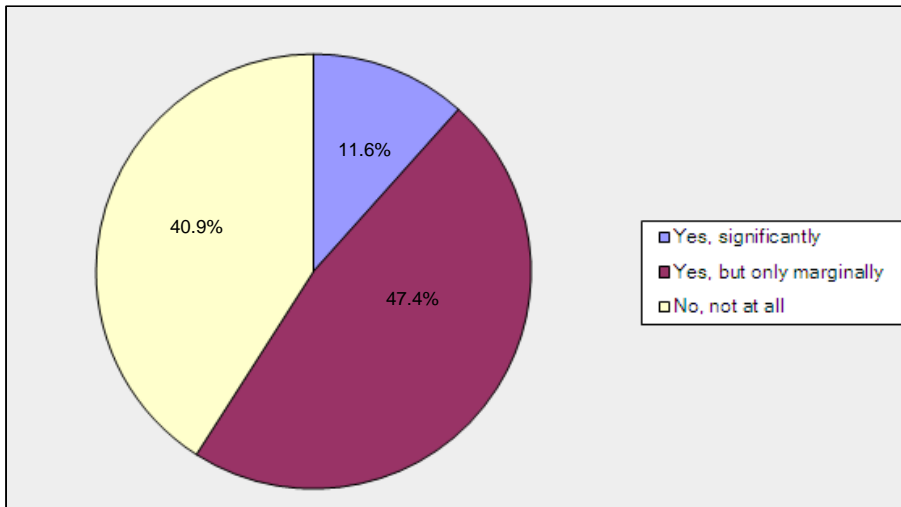
11. **813** respondents expressed an opinion on this question. **559** answered in favour of further harmonising of training and testing.
12. Most of the industries represented were in favour of further harmonisation. There was particularly strong support from the bus and coach industry (**70%** in favour), the road haulage industry (**65%**), ADIs (**70%**) and training providers (**77%**). Representatives of local governments were also strongly in favour.
13. The general support for harmonisation for training and testing was to bring into the standards of other member states up to the perceived higher standards of the UK.  
  
*'...should be harmonised so that other member states are at the same level as the UK',  
'... the UK are subjected to strict rules that foreign drivers coming into the UK do not follow and are not required to in their own EU country'.*
14. There were **316** comments left by the respondents. General themes expressed in the comments in favour were that standardisation 'would work to ensure equality of drivers across the board from all nations' and 'ensure that all drivers are being trained to the same standards to improve road safety'. There is also the common opinion that although this is a good idea, there needs to be strict enforcement and buy-in from all member states. There should also be a degree of flexibility to allow industry specific training.
15. Those who said no to harmonisation stated that 'it would be too difficult to enforce'. These respondents also thought that the cost of achieving this would be too expensive and would be passed on to drivers. Many commented that the current training arrangements allowed for a greater scope of training to be provided, and that harmonising would restrict the industry specific training that is currently delivered.

**Question 7 - Do you think that the Directive has contributed to increasing safety on European roads? Please explain your answer in the comments section.**



16. **748** respondents expressed an opinion on this question. **71** agreed that the Directive has significantly increased safety on European roads. **328** believe that it has had a positive yet marginal impact, while **349** believe there has been no road safety benefit.
17. The majority of industries agreed that there had been a positive impact on road safety, with around **20%** of ADIs and local government respondents believing that the impact was significant. The road haulage industry and training providers strongly agreed that there had been a positive impact, with **62%** and **72%** positive responses respectively.
18. Only respondents from the construction industry believed that there had been no overall impact (**63%**) on safety on European roads.
19. There were **521** comments left by the respondents.
20. Those respondents who had seen some positive effect on road safety commented that 'although the training is not perfect, it has given drivers a lot more awareness than they previously thought they had'. It has also encouraged drivers to 'think what they do' more regularly. There is also a recognition that drivers who are open-minded to DCPC will benefit from it. However, respondents also felt that there is a lack of evidence to support the impact of DCPC on road safety standards.  
  
*'Personally haven't seen any evidence of road safety, would need to see more stats'.*
21. The respondents who saw no improvement in road safety felt that 'many drivers feel that much of the CPC is irreverent to their work' and so do not take it seriously. They also noted that many drivers 'attend the same course five times' as a way of easily attaining their DCPC. There was also a general feeling that periodic training is 'useless for experienced drivers' and should only be for those newly qualified.

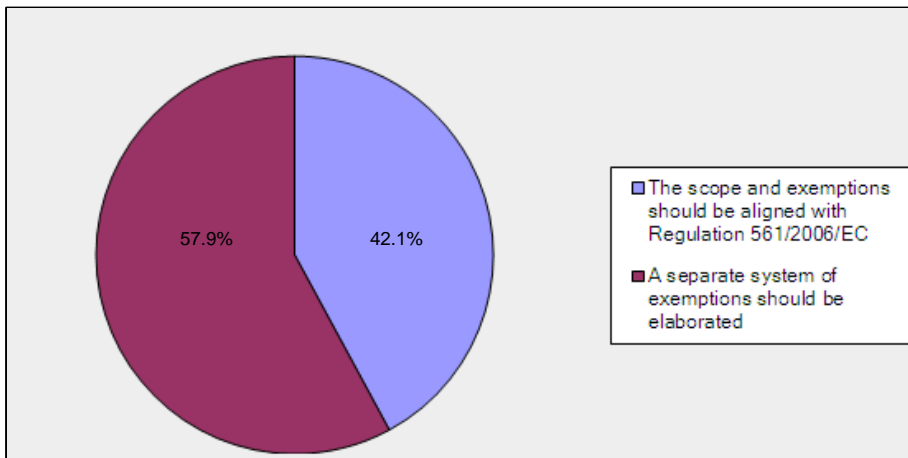
**Question 8 - Do you think that the Directive has contributed to the development of the level of professional competence of drivers?**



22. **748** respondents expressed an opinion on this question. **86** agreed that the Directive has significantly increased the level of professional competence of drivers. **351** believe that there has been a marginal improvement, while **303** believe there has been no improvement in driver competence.
23. There was a general feeling across most industries that the Directive has improved the professional competence of vocational drivers - ADIs in particular, with **85%** agreeing that there had been a marginal or significant improvement. There was also a strong positive response from the forces/emergency services and training providers – **71%** and **75%** respectively seeing an improvement in competence.
24. There were **440** comments left by the respondents. Those who have seen an improvement in driver competence said that the Directive has improved and refreshed understanding of 'legal requirements of driver large vehicles, such as drivers' hours'. Although many also commented that the training is 'more useful to newly qualified drivers'. It was stated again that it only benefits drivers who 'take it seriously' and many feel that more experienced drivers do not see the need to improve.
25. The respondents who felt there was no improvement in driver competence felt that a lack of practical training or assessments mean that drivers do not learn anything worthwhile. Again it was noted that many drivers 'attend the same course five times' as a way of easily attaining their DCPC. Many respondents also felt they 'didn't learn anything that wasn't already common practice'.
26. Operators who provided in-house training courses for their drivers feel that DCPC has provided a useful structure for developing training programmes.
27. A number of respondents chose not to answer as they feel it is too early to say whether improvements have been made.

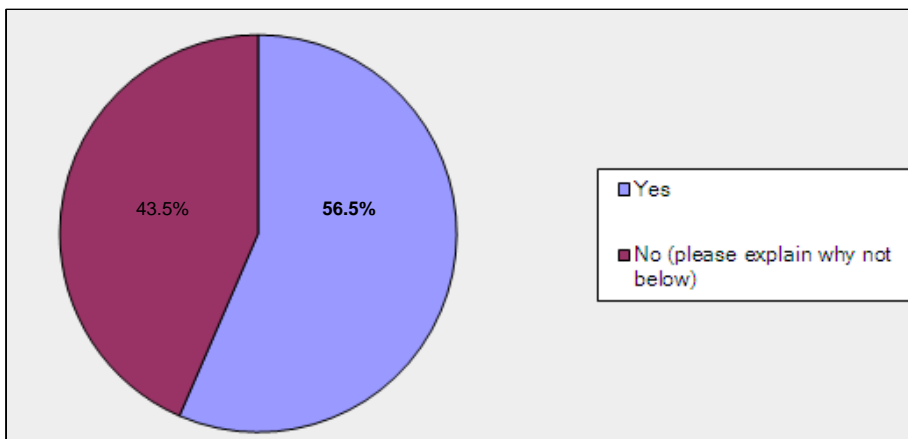


**Question 9 - Do you think that the alignment of the scope and exemptions for Directive 2003/59/EC with the ones stipulated in Regulation 561/2006/EC would best increase clarity on the scope of the Directive? Alternatively, do you think that a separate system of exemptions would be the most adequate option?**



28. **639** people answered this question. **269** thought that the scope and exemptions should be aligned with Regulation 561/2006/EC to clarify the scope of the Directive. 370 believe that a separate system of exemptions would be more suitable.

**Question 10 - Do you support the current exemptions, including those adopted in GB?**



29. **673** people answered this question. **380** support the current exemptions and **293** do not.

30. There was strong support for the current examples within the bus and coach industry (**63%**) and the construction industry (**67%**). Training providers' opinions were split 50/50.

31. The majority of the vehicle recovery (**58%**), farming (**55%**) and forces/emergency services (**60%**) industry workers who responded do not support the exemptions. Those who do not support the current exemptions were asked to leave a comment to explain their reason. **296** comments were left in total. A large number of respondents thought that the 'incidental driver' exemption is not clear as to who it covers.

32. Opinion is split as to whether the scope of the exemptions should be widened or tightened. Those in favour of narrowing the scope commented that 'if you drive any type of vehicle professionally then you must hold a DQC – no exemptions'. However, those in

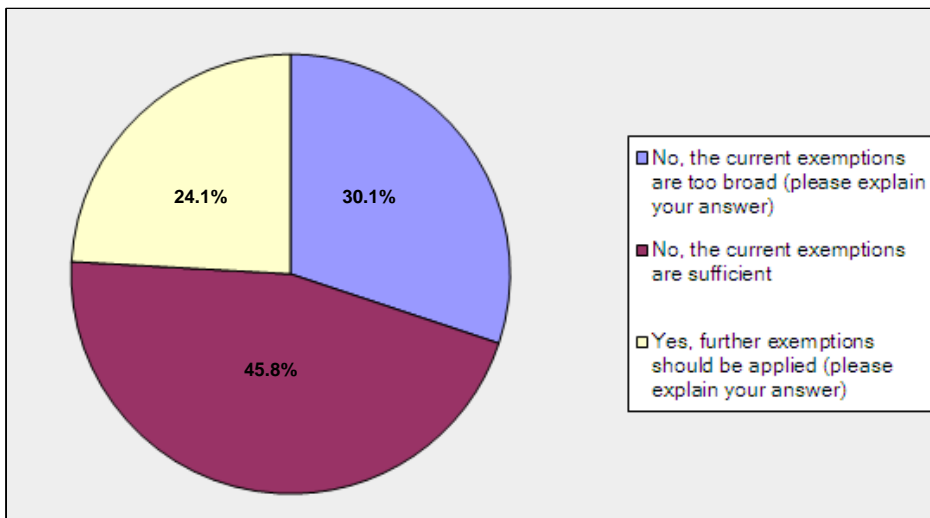
favour of widening the scope felt that drivers who qualified before the Directive came into force should be exempt.

‘Drivers who already held their licence before the DCPC was introduced should not have to do the DCPC. New drivers only should have to do it, as there [sic] the ones with problems. Plus all non-UK drivers should have to take a Highway Code test before they drive in the UK.’

33. Others urged a pragmatic approach.

‘the alignment of scope and exemptions with Regulation 561 seems appealing on the grounds of simplicity. However, it is important to reflect that exemptions are not implemented simply for convenience’.

### Question 11 - Are there further driving activities or classes of driver that you consider should be exempt from DCPC?



34. **190** respondents believe that the current exemptions are too broad. **289** think that the exemptions are sufficient at present, and **152** think want further exemptions to be applied.

35. The majority of respondents from all industries thought that further exemptions should not be applied. There was fairly strong feeling from training providers (**44%**) and those who responded from the forces/emergency services (**40%**) that the exemptions are too broad. Around 30% of bus, coach and lorry drivers also think the exemptions are too broad.

36. Overall there was little support for applying more exemptions. However, those from the farming industry showed most support, although this was still below **50%** with around **44%** thinking further exemptions should be applied.

37. **292** comments were left by respondents to explain why the scope of the exemptions should be narrowed or widened. Many who stated they wanted more exemptions based that on experience gained. It was felt that if a driver has 5, 10 or 20 years of driving experience, without incident, then they have proven they are capable and should be exempt. It was also argued that drivers who passed their test prior to DCPC being introduced should be exempt.

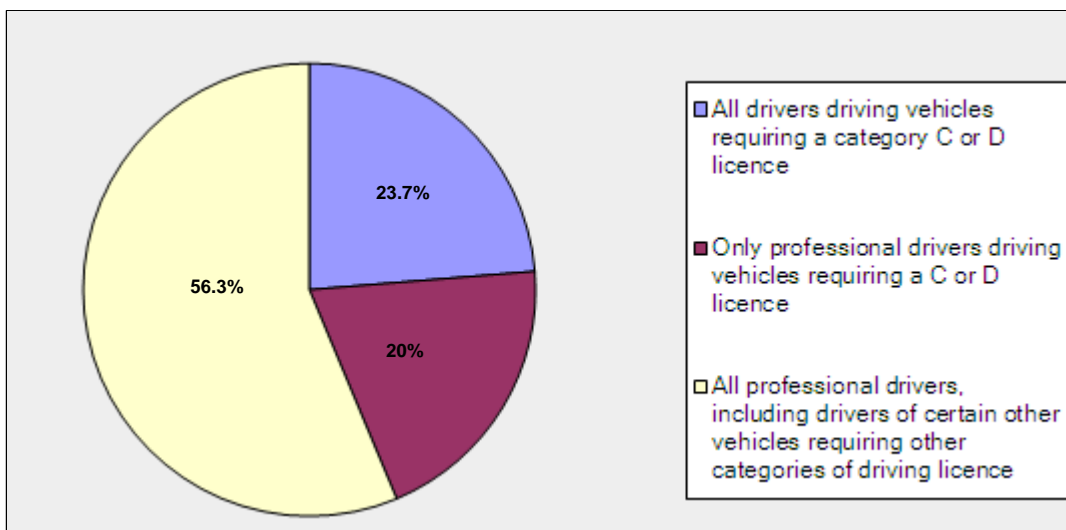
'all hgv drivers who have done there driving test before the laws were brought in.'

38. Specific additional exemptions suggested included:

- Farmers
- Those who only drive in GB
- Transport managers
- Road sweepers/gully cleaners
- School minibus or community drivers
- Holders of National/International CPCs
- Part-time/semi-retired drivers
- Section 19 and 22 drivers

39. There was a general consensus among respondents who thought the current exemptions are too broad that all professional drivers, or drivers of vocational vehicles should have to do some form of DCPC, on the grounds of road safety. There was also support for the specific removal of the 'incidental driver' exemption.

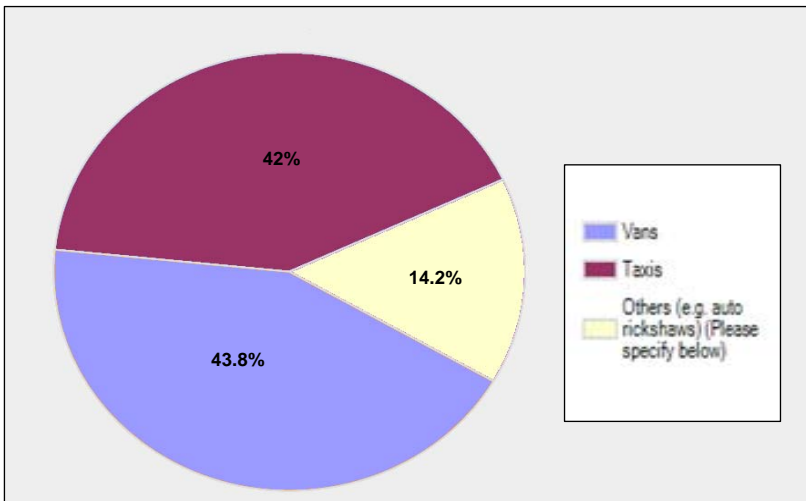
**Question 12 - Who do you think the regime of DCPC qualification and training should apply to?**



40. **604** people responded to the question. Of these, **143** believe that all category C or D licence holders should be in scope of DCPC, and **121** think that it should apply to professional drivers driving category C or D vehicles only. The majority of respondents, **340** people, believe that the Directive should apply to all professional drivers regardless of vehicle category.

41. There is strong support throughout the various industry respondents for DCPC to apply to all professional drivers, regardless of vehicle. This is particularly supported by the ADI industry, with **92%** of them selecting this option.

**Question 13 - Which other vehicles?**

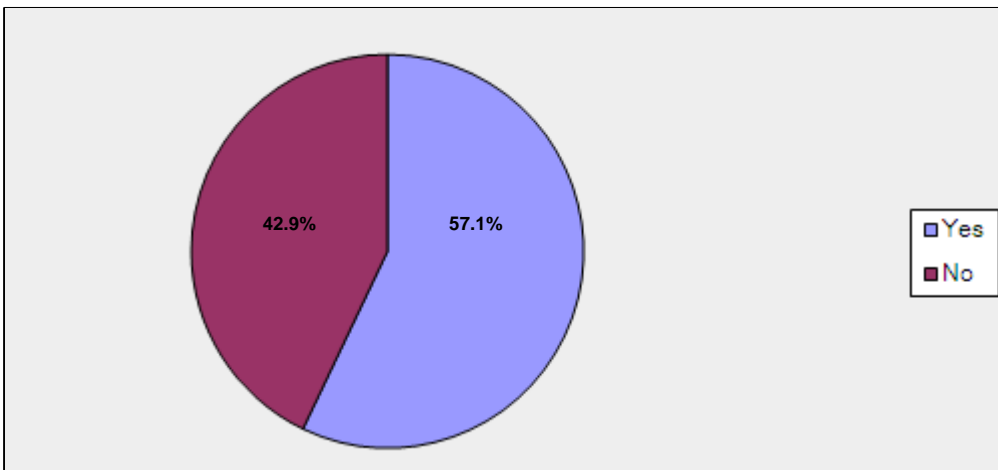


42. **712** answered this question. **312** are in favour of extending DCPC to include drivers of vans, **299** taxis and **110** specified other vehicles.

43. **152** people left suggestions as to what other vehicle drivers should undertake DCPC. The majority of ideas put forward were from the road haulage, bus and coach and training industries. Suggestions include:

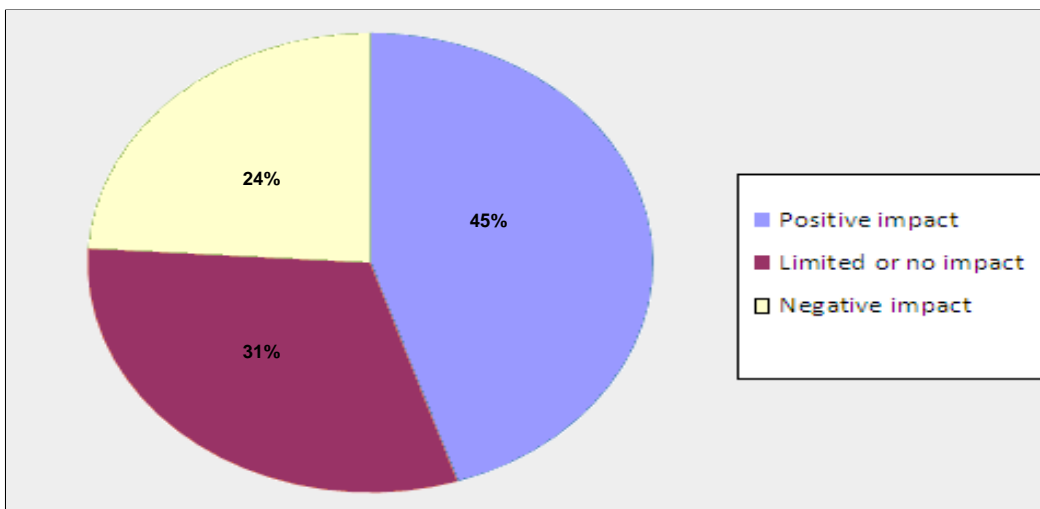
- Mini cabs
- Cyclists
- Motorcycle couriers
- Agricultural vehicles
- Minibuses with 8 seats
- Anyone who drives as part of their job
- All motorists
- Limousines
- Horseboxes
- B+E drivers
- Private hire vans
- Milk floats

**Question 14 - Do you think the CPC training should be structured in such a way to offer an option between gradual access to professional driving at an earlier age on the basis of training and experience and direct access at a higher age? (Please explain your answer)**



44. Of the **595** respondents who answered the question **340** agreed and **255** disagreed.
45. The majority of respondents in most industries thought that DCPC training should be structured to offer an option between gradual access to professional driving at an earlier age and direct access at a higher age – in particular ADIs (**83%** in favour), forces/emergency services (**60%**), training providers (**59%**) and the road haulage industry (**58%**).
46. Respondents from the construction industry were split 50/50. The majority of farmers (**56%**) and those in the vehicle recovery industry (**64%**) are against offering a two option system.
47. **354** respondents left comments explaining their answer. Many respondents who answered in favour believe that ‘age is not a barrier to ability’ and that this change would help the industry by attracting younger people to become professional drivers. However, it was noted that this would depend on whether insurance companies would be willing to insure younger drivers.
48. Respondents who disagreed showed support for the existing training and testing system and felt that ‘new drivers can be as good as more experienced drivers’. A few comments stated that cost would be an issue to implementing the proposal and that it would be ‘a waste of time’.

**Question 15 - What impact might a graduated access regime have on driver recruitment into your industry?**



49. **383** responses were received. **45%** thought there would be a positive impact on their industry, **31%** believe a negative impact would be felt, while **24%** said there would be little or no impact.
50. Most respondents who believed a positive impact would be felt said that it would attract more and younger drivers into their industry, and offer more opportunity and confidence for employers. Many also stated that it would ‘maintain the reputation of the professional driver and hopefully earn some respect from other road users’. It was also felt that the standard of driving will increase through the extra training, and the cost will only attract people to the industry who intend to drive as a career.

51. The majority of commentators who stated there would be a negative impact believe that it will put people off entering their industry. This opinion is largely based on the perceived extra cost drivers will incur when qualifying.

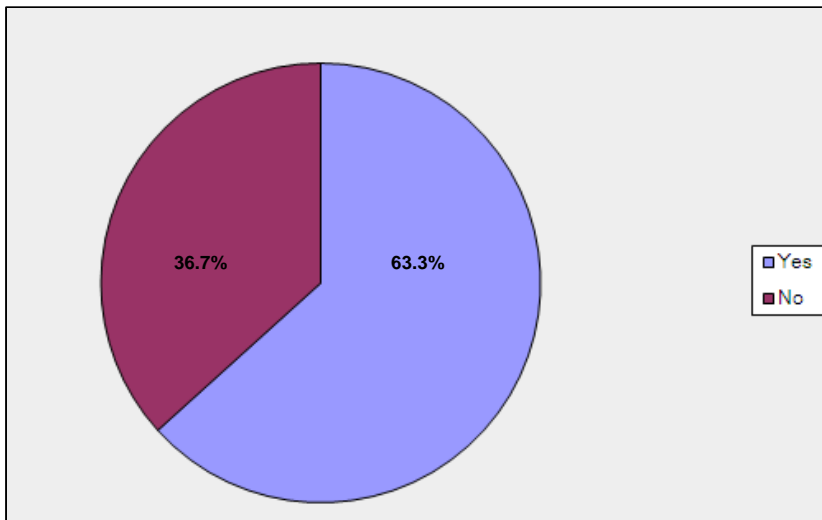
**Question 16 - In GB we have adopted the provision in the Directive for young people to gain a DCPC from the age of 18 within the national vocational testing scheme. We should welcome any evidence of how this scheme is working for the freight and passenger transport industries.**

52. **274** responses were received. Respondents who answered positively said that they have seen evidence of the scheme 'bringing in much needed young blood into an aging industry' and that they have 'seen a number of new drivers' entering the industry.

53. Those who have seen no evidence commented that it has 'not made a difference as insurance companies will not insure younger drivers'. A number of employers also stated that they 'would not employ 18 years old, as they shouldn't be driving HGVs – they don't have the experience'.

54. A significant proportion of respondents – approximately **40%** - have had no experience of the scheme or could not comment.

**Question 17 - Are the subjects listed in Annex 1 for the initial qualification and periodic training relevant for the objectives of the Directive? If there are subjects you consider irrelevant, please provide details.**



55. **490** responses to the question were received. Of those **310** agreed that the subjects at Annex 1 are relevant, while **180** disagreed.

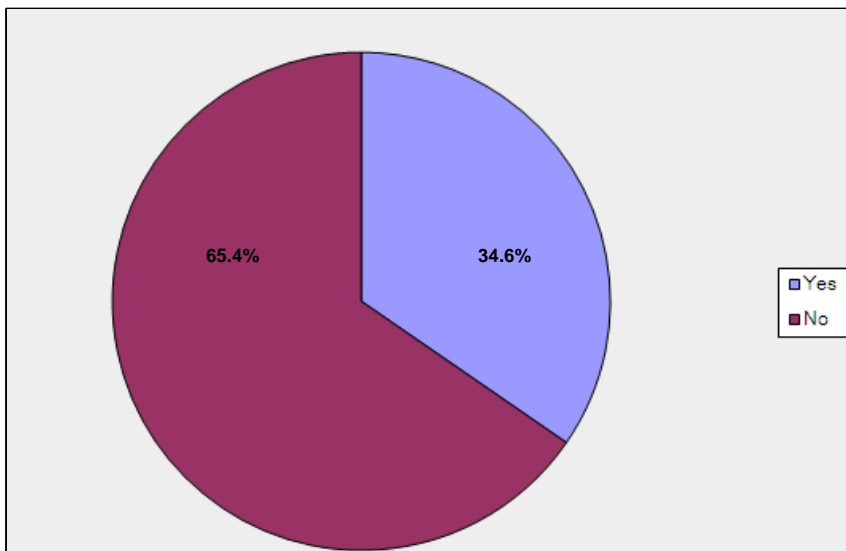
56. The majority of respondents across those industries who were asked to complete the questionnaire strongly agreed that the subjects listed in the Directive are relevant - all except 'other' had **60%** or more respondents that answered 'yes'.

57. In total **154** comments were left. Many commentators believe that the subjects, although relevant, need to be more industry specific. Suggestions put forward as to which subjects are irrelevant were:

- Route planning – patronising to older drivers
- Healthy eating – patronising and useless
- Health and Safety – already covered in other courses, and covered better
- The need to know how to calculate Maximum Authorised Mass on coaches
- Customer Service – only relevant to PCV drivers
- Driver profiling

58. A number of respondents said that all the subjects covered were irrelevant for experienced drivers.

**Question 18 - Are there other subjects that you consider should be included (and explain why)?**

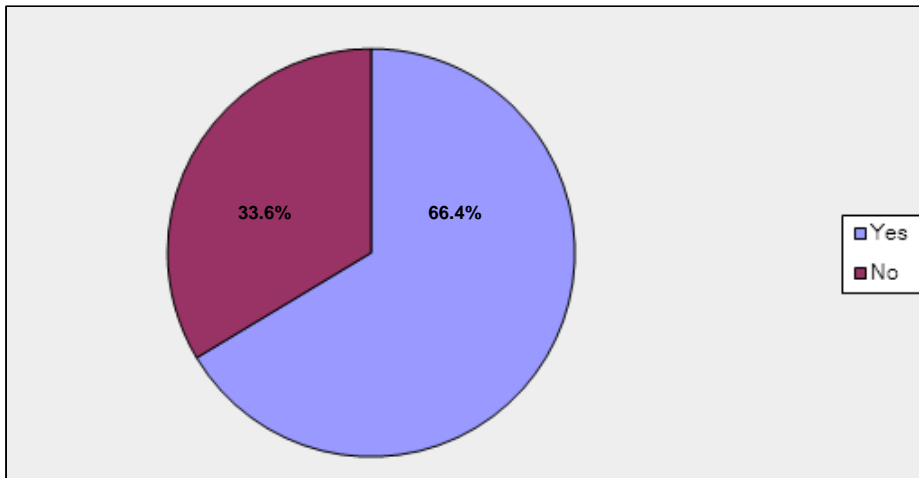


59. **459** responses were received – **159** thought more subjects should be included and **300** thought not.

60. **182** comments were left explaining the respondent's answer. A number of suggestions for additional courses were put forward. The most common were:

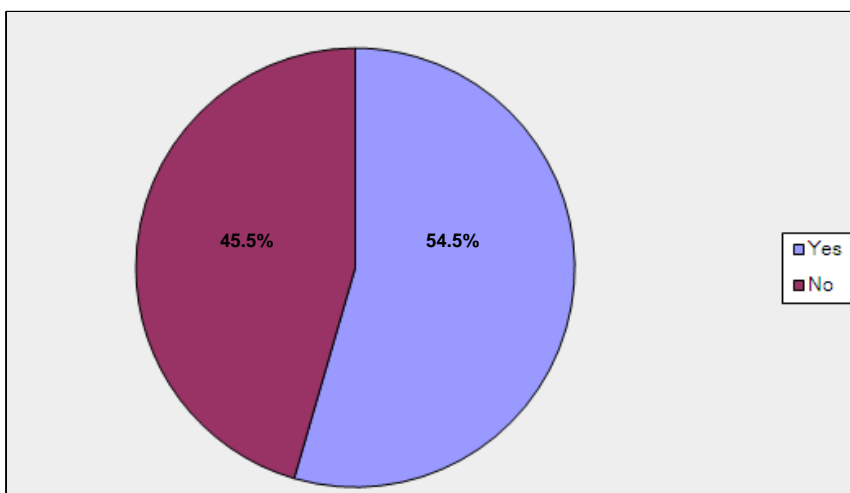
- Driver's hours
- Practical assessments
- Load security
- Tachograph regulations
- Disability Awareness
- Compulsory first aid training
- Roping and sheeting
- Practical handling of cargo
- Speed awareness
- Driving abroad - rules for countries overseas

**Question 19 – Do you think there should be a uniform European syllabus for periodic training (and why)?**



- 61. There were **536** responses to the question – **356** answered in favour of a uniform European periodic training period. **180** were not in favour.
- 62. A high percentage of respondent from a number of groups agreed, for example ADIs (**70%** in favour), local government (**80%**) and training providers (**70%**).
- 63. There were only two groups where a majority of respondents were not in favour of a uniform European syllabus – farming (**57%** against) and forces/emergency services (**60%**).
- 64. **360** comments were received. Those who thought that there should be a uniform syllabus for periodic training stated that it will help improve that standard of drivers across the whole EU. It would also 'help drivers to understand foreign driving conditions better'. However, it is still seen as vital that there remains a degree of flexibility so that industry and state specific courses can be delivered.
- 65. The people who disagreed with the proposal also felt that more flexibility with the syllabus is more important, and that 'each country should be able to tailor its own to give it more meaning'.

**Question 20 - Do you think that the timing of periodic training should be prescribed in regulations?**





66. **517** responses were received. **282** respondents are in favour of the timing of periodic training being prescribed in legislation, and **235** are against.
67. The road haulage and bus and coach respondents' opinions were split almost 50/50 for both groups.
68. The other groups had either strong opinions for or against the regulation of periodic training timing. For example, those in favour included ADIs (**89%**), vehicle recovery drivers (**75%**) and training providers (**67%**). Those against regulation were the forces/emergency services (**100%**), farming (**86%**) and construction (**61%**).
69. **249** comments were left. Those in favour generally stated that 7 hours of periodic training should be done per year – this would allow drivers to continuously develop rather than 'crash course' training once every five years.
70. Those against think the flexibility achieved in the current system works. It allows 'training to fit with work requirements' and puts less pressure on drivers and employers.

**Question 21 – Do you have any evidence to support that the position we have taken is assisting your industry? Or evidence to support a more prescribed regime?**

71. **262** respondents provided comments. The majority of respondents provided no evidence to support either argument. There is a general feeling that the industries, be that employers or drivers, are not taking DCPC seriously. Many comments were made about the quality of training and how drivers see it as a waste of time.

'The overwhelming perception of DCPC from drivers is one of scepticism - it is seen as a financial and bureaucratic burden... worsened by the perceived irrelevance, poor content and delivery of some courses; the lack of assessment and subsequent recognition of a drivers increased knowledge/skills; poor engagement and communication with drivers about its benefits'

72. There were some comments saying that an improvement in driver behaviour has been noticed.

'I believe that over the past 5 years the standard of HGV driving has improved in UK, and I think that it will continue to improve'.

73. Respondents also noted that the current, flexible scheme is preferable to a more prescribed regime.

'The position you have taken has enabled companies like my employer to get drivers DCPC'd [sic] gradually over the 5 years. It would have been impossible under a more prescribed regime' and 'It has been our company's experience that the current regime provides a better option than a more prescribed regime would'.

**Question 22 - Are there any other aspects of the Directive you would like to comment on or other points you would wish the Department for Transport to make in its response to the Commission's review?**

74. **307** responses were received.

75. Similar themes throughout the comments centred on the need to increase the flexibility of periodic training, both by including industry specific subject matter and by making

course length variable. There appears to be an appetite from some drivers to include exams/assessments at the end of courses as they feel this would ensure the training is taken more seriously.

'The DCPC is a good idea but the method, modules, delivery and testing are making it a tax on driving jobs... It needs to be a test based qualification, modules standardising and issued by authority responsible with the companies buying these from them. The courses should be held in classrooms'.

76. The quality of trainers and courses was criticised heavily, as was the ability for drivers to take the same course five times to get a DQC. Many felt that the only reason drivers attend courses is to get their 7 hours and not to take it seriously. The scheme as a whole was also criticised heavily.

'Some drivers have completed the same course 5 times. Some companies only have one course available to their drivers who again complete it 5 times.'

'My personal opinion is that it is generally of little use and for me has simply been a 'tax' on going to work'

77. There is a feeling that the UK is the only Member State that enforces the Directive and period training requirement. This also leads to suspicion that foreign nationals return to their country of origin and 'buy' a DQC and return to work in the UK.

'Police it better. Too many drivers from other member states are buying a dcpc card with no formal training'

78. Operators expressed concern that the requirements of the Directive are making it increasingly difficult to recruit new drivers as they are put off by the cost of training. They also fear this will lead to a shortage of drivers in the future.

'There are now so few new drivers coming into the coaching industry that we are finding it very difficult to find drivers. The amount of training has significantly increased the cost of getting a licence for what is not a particularly well paid job'

79. Many respondents also want the scope of the Directive widened to include any person who drives as a part of their profession. The road haulage industry, in particular, feel they are persecuted unfairly, and that all other roads users (such as cyclists and car drivers) would benefit from regular refresher training.

'I believe that there should be no exemptions if we are to be professionally driving in the course of our work'

'Confusion could be eliminated by making the qualification a requirement for all professional drivers'

## Thank you

DSA would like to thank everyone who contributed to this consultation.

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