



# Analysis of consultation on reforms to the Driver Certificate of Professional Competence (DCPC)

Final report

26 June 2023

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A report submitted by [ICF Consulting Services Limited](#)  
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# 1 Introduction

This report presents analysis of the Department for Transport's consultation on the Driver Certificate of Professional Competence (DCPC) qualification. The consultation ran for eight weeks between 2 March and 27 April 2023. This paper includes analysis of the near 1,200 formal responses to the consultation and additional written submissions.

## 1.1 Background and context

DCPC is a qualification that professional drivers of certain goods or passenger carrying vehicles must hold in addition to their driving licence. It was introduced into domestic law as a result of EU legislation. In the UK it is initially obtained by completing 4 tests consisting of:

- A 2-part theory test
- Case studies
- A practical driving test
- A practical demonstration of vehicle operation

Drivers maintain the DCPC by completing 35 hours of periodic training every 5 years. Completing 35 hours of training allows a driver to drive for commercial purposes for 5 years.

The current process for completing the DCPC is considered onerous by some and there are concerns that this is leading to some large vehicle drivers leaving the sector and discouraging new entrants. Therefore, the Department for Transport proposed reforms to the qualifications, in order to:

- Make the qualification more flexible, by removing the requirements that the training modules must be 7 hours over one day or 3.5 hours split over two consecutive days.
- Increase choice for renewing DCPC by offering three different choices that vary depending on where individuals intend to drive. These are the I-DCPC training (for those driving internationally); N-DCPC reformed training and N-DCPC periodic test (both for driving in GB only)
- Faster re-entry for I-DCPC returning drivers by creating new testing and training routes.
- Reduce cost and time burdens for I-DCPC training, which currently costs around £250-£500 for 35 hours of training. The new proposals would create a 1-1.5-hour renewal test which would cost £40-£70.
- Increasing focus on quality of knowledge obtained from I-DCPC training, through creating shorter courses which may increase knowledge retention.

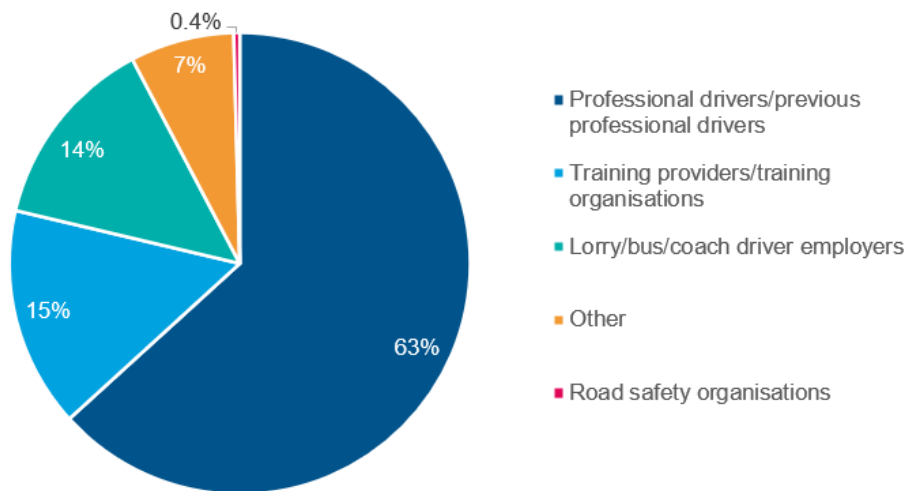
The reforms also plan to introduce:

- Short-term, time-limited extensions to existing drivers' DCPCs or exemptions in exceptional circumstances
- A recognition or exchange scheme for drivers that have non-UK qualifications that wish to drive within the UK
- Different options for evidencing the N-DCPC

## 1.2 Overview of the consultation responses

The Driver Certificate of Professional Competence (DCPC) consultation received 1,190 responses through the online portal from across five respondent groups.<sup>1</sup>

Figure 1.1 Overview of online responses



A further 175 email responses were received as part of the consultation. These included generic feedback, feedback in regard to a specific area of the consultation, and position statements. At least fifty of the offline responses were from current and former professional drivers but the total number is unknown as not all respondents indicated their position. A total of 16 position statements were received from organisations and two organisations submitted the findings from their own surveys.

A total of 15 key stakeholders submitted responses either through the online portal or through an offline submission. These were:

- Road Transport Industry Training Board (RTITB)
- Road Haulage Association (RHA)
- Unite the Union
- Wincanton
- Dynamic Parcel Distribution (DPD)
- Confederation of Passenger Transport (CPT)
- Transport Scotland
- Logistics UK
- Parliamentary Advisory Council for Transport Safety (PACTS)
- The Association of Local Bus Managers (ALBUM)
- Nottingham City Transport
- Dalsey, Hillblom and Lynn (DHL)
- The Royal Society for the Prevention of Accidents (RoSPA)-
- Royal Mail
- Stobart

Responses from these organisations are highlighted throughout the analysis.

<sup>1</sup> Includes responses received through the online portal and email responses which contained a written submission answering all or most of the consultation questions.



### 1.3 Responses per question

The individual questions that were in the consultation and the number of responses received for each are presented in Table 1.1.

Table 1.1 Consultation questions containing open-ended fields

Question number	Question	Number of responses received
Q8	Respondents current thinking with regard to DCPC renewal or return, and the reason for their selection	239
Q10	Respondents current thinking on returning to driving for which a DCPC is required	41
Q14	Approximately how much does it cost to travel to and from training locations, on average, per day – considering the cost of fuel, public transport, and other travelling costs?	551
Q16	On average how many hours per day, when travelling to and from training locations, would you save if you did not have to travel to training course locations?	657
Q21	As an employer, specify the maximum amount you would cover for an employee undertaking the proposed test option?	162
Q32	In your opinion how effective is DCPC currently in meeting its stated aim of improving road safety and professionalism of drivers?	919
Q33	Respondents current thinking on whether the DCPC should stay the same, be reformed, or be abolished	959
Q36	Respondent views on the changes needed for DCPC reform	167
Q38	Respondent views on the benefits the proposed changes to introduce N-DCPC 'Reformed Training' will bring	103
Q39	Respondent views on the detrimental effects the proposed changes to introduce N-DCPC 'Reformed Training' will bring	155
Q41	Respondent views on the benefits the proposed changes to introduce N-DCPC 'Periodic Test' will bring	97
Q42	Respondent views on the detrimental effects the proposed changes to introduce N-DCPC 'Periodic Test' will bring	146
Q46	In your opinion how effective could the 'New periodic test' be in ensuring DCPC meets its stated objective of improving road safety?	664
Q49	In your opinion how effective could the 'New periodic test' be in ensuring DCPC meets its stated objective of improving professionalism of drivers?	631
Q51	In your opinion how effective could the 'Initial test re-sit' be in ensuring DCPC meets its stated objective of improving road safety?	539
Q53	In your opinion how effective could the 'Initial test re-sit' be in ensuring DCPC meets its stated objective of improving professionalism of drivers?	497
Q55	Would you support giving drivers the choice of completing the N-DCPC 'Periodic Test' option along with the existing I-DCPC and N-DCPC 'Reformed Training' option?	207
Q59	In your opinion would having a test option mean you would be more likely to renew your DCPC?	324
Q61	Respondent views on the subjects they should be included in the 'New periodic test'	158

Q72	Respondent views on how likely are the N-DCPC 'Reformed Training' changes to make it easier to attract and retain drivers that require DCPC	476
Q73	Respondent views on the time limit they think should be imposed between completion of the trainer-led course and corresponding e-learning	804
Q78	Respondent views on whether they support the principle of 'specific return pathways' to allow drivers to return to the sector	118
Q80	Respondent views on the minimum time, in months, a driver's DCPC qualification should have lapsed before they can utilise any of the 'specific return pathways'	670
Q81	Respondent views on the maximum time, in months, a driver's DCPC qualification should have lapsed before they can utilise any of the 'specific return pathways'	664
Q83	Respondent views on the pathways they would support and why	257
Q85	For respondents that selected none of the pathways, the alternatives they would suggest	51
Q88	Respondent views on return to driver training alternatives	62
Q90	In your view within what time period should a driver complete the remainder of their training after a 'return to driving' module in order to gain a 5-year entitlement to drive commercially?	398
Q91	Respondent views on the subjects they think should be included in the 'return to driving' module	75
Q93	In your view how many times should a driver be able to utilise the 'specific return pathways'?	641
Q94	Respondent views on the circumstances that should trigger short term extensions	105
Q95	Respondent views on the circumstances that should trigger short term exemptions	70
Q97	Respondent views on what would short term extensions mean	156
Q98	Respondent views on what would short term exemptions mean	121
Q99	Does the extension period seem like an appropriate amount of time?	874
Q100	Does the exemption period seem like an appropriate amount of time?	875
Q101	In your opinion should short term exemptions only be offered to those who previously held a DCPC qualification and let this lapse ?	269
Q102	For this exemption how long, in your view, is an acceptable period for the qualification to have lapsed in months?	606
Q104	Would you support the creation of an exchange scheme for non-GB and non-NI qualifications and why?	502
Q106	Would you support the creation of a recognition scheme for non-GB and non-NI qualifications and why?	383
Q108	What is your view on having the DQC replaced by an electronic version?	620
Q109	Final comments	627

## 1.4 Research methodology

### 1.4.1 Synthesis and analysis of the data

The methodology for analysing the open-ended consultation responses included a mix of Natural Language Processing (NLP) and manual analysis. NLP was used when there was a large volume of qualitative material to draw on. It was primarily used to analyse the 42 open-ended questions including the supplementary free text in the closed-ended questions.

The NLP analysis comprised of:

- **Data cleaning.** To remove responses such as 'No comment' or 'N/A'
- **Topic modelling.** Topic modelling is an unsupervised machine learning technique that employs computer algorithms to identify latent topics in the text. Because the human eye often cannot discern topical patterns in vast amounts of textual data, the aim of topic modelling is to identify a combination of words that form a topic, which is an abstract concept that requires interpretation.
- **Sentiment analysis.** To gauge perceptions sentiment analysis was employed. This is a supervised machine learning technique that gauges the mood and emotion of textual data by comparing pre-generated corpuses of emotion to responses and subsequently assigning words and sentences polarity scores.

Manual analysis was required to analyse consultation responses that were not mapped to the questions in the consultation, including the submitted position papers, and for groups of respondents where the number of responses was too small to use automated techniques. Where the position papers directly addressed the proposals, analysis of these was included under the relevant questions and coded as 'other organisations'.

A selection of 100 responses that were processed using NLP were also analysed manually to quality assure the results. This did not find any discrepancy between the themes emerging from human reviewers and those identified by the NLP algorithm.

### 1.4.2 Qualitative interpretation

Themes that were derived from automated text and manual analysis were used to produce a summary of responses, disaggregated by key respondent groups, to each consultation question. Where respondents addressed questions that differed from those in the official consultation, analysis of these responses has been included alongside the consultation questions to which they map most closely.

All responses have been treated equally however, some have been submitted on behalf of organisations and therefore represent the views of a wider group of people. It is not possible to quantify the number of people represented in each of these organisational responses and therefore these responses have been reported separately when they differ from the majority view on a question.

This report uses direct responses to the consultation which contain the viewpoint of respondents. These have not been adjusted or corrected to reflect existing processes and therefore could contain some misinterpretations which do not reflect existing processes. We have analysed all responses at face value.

We have used qualitative terminology to quantify the extent to which certain responses have been reported, such as few, some, most. These are defined below:

Table 1.2 Definition of qualitative research terms

Term	Percentage range
Nearly all	Over 90%
Most	65-90%
Some	35-64%
Few	10%-34%
Very few	Less than 10%

## 2 The current DCPC system

This chapter examines the qualitative questions related to the current DCPC system, which are:

- Q7 and Q8. Respondents current thinking with regard to DCPC renewal or return, and the reason for their selection
- Q9 and Q10. Respondents current thinking on returning to driving for which a DCPC is required
- Q14. Cost to travel to and from training locations
- Q16. Time spent travelling to and from training locations

### 2.1 Q7 and Q8: Upcoming DCPC renewal

When asked, most (63%, or 419) of the 665 respondents that answered the question stated that they planned to renew their DCPC when it expires (Q7). A further 13% (88) of respondents stated that they are not, and 24% (158) are unsure.

Figure 2.1 Overview of respondent plans to renew their DCPC when it expires



■ Looking to renew your DCPC when it expires ■ Not sure about whether to renew your DCPC or not ■ Not looking to renew your DCPC

A third of respondents (36%, 239) elaborated on the reason for their response (Q8). Nearly all that stated they were unsure or were not looking to renew their DCPC when it expires provided their reasoning, while <1% that planned to renew provided their reasoning.

Table 2.1 Overview of respondents that elaborated on their response

Response option	Total responses	Number of respondents that elaborated on their response	Percentage that elaborated on their response
Looking to renew your DCPC when it expires	419	2	0.5%
Not sure about whether to renew your DCPC	158	156	99%
Not looking to renew your DCPC	88	81	92%

Most respondents that stated they were unsure or did not plan to renew their DCPC reported that it was because of the time and/or costs incurred, which some reported they had to pay for themselves. Some drivers, and particularly those with many years' experience, felt they had not learnt anything new from the training.

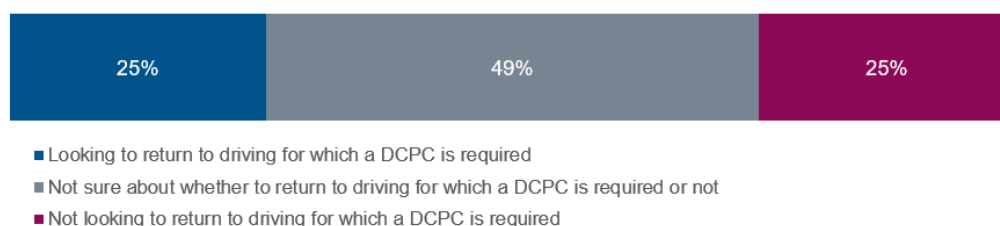
Some drivers also reported that they were unsure or did not plan to renew their DCPC because they felt it was "red tape" which was ultimately an administrative requirement that added little to the sector. Two of these respondents stated they felt the qualification was not necessary for domestic driving.

A few respondents (12%, 29) also stated that they were unsure or did not plan to renew their DCPC because they were retiring or planning to change industry. However, ultimately this was only a small proportion of respondents.

## 2.2 Q9 and Q10: Returning to DCPC required driving

A total of 59 respondents responded to the question that asked if they were looking to return to driving for which a DCPC is required (Q9). They provided a mix of responses, with 25% (15) of respondents answered that they are, 25% (15) stating they are not and 49% (29) stating they are unsure.

Figure 2.2 Overview of respondents looking to return to driving for which a DCPC is required



Of the 41 responds that provided reasons behind their response (Q10), all were unsure or not looking to return to driving for which a DCPC is required.

For those who reported that they are not looking to return, most stated that it was because they felt the DCPC should no longer be used, with some reporting that it should be used only for drivers new to the industry. Most also reported the time and cost barriers for undertaking the training.

Similar reasons were given by respondents that were unsure about returning to driving for which a DCPC is required. However, a few also mentioned that as a legacy EU law the requirement should not be in place since the UK left the European Union. Other reasons reported by a few respondents was that the training was ineffective for experienced drivers, as well as more general dissatisfaction with the industry.

Table 2.2 Overview of respondents that elaborated on their response

Response option	Total responses	Number of respondents that elaborated on their response	Percentage that elaborated on their response
Looking to return to driving for which a DCPC is required	15	0	0%
Not sure about whether to return to driving for which a DCPC is required or not	29	27	93%
Not looking to return to driving for which a DCPC is required	15	14	93%

### 2.3 Q14: Costs of travelling to training course locations

The 551 respondents that described the costs of travelling to and from training locations most reported costs of £10.01-£20.00 (25%) followed by £5.01 to £10 (20%) and £20.01 - £30.00 (12%). Of the 22 respondents that provided a free text response, a third of these stated that lost earnings should be factored into the costs due to time taken off work to undertake the training. A few respondents noted costs of £75 or more and a few mentioned hotel and transport costs.

Figure 2.3 Overview of the costs of travelling to and from training locations



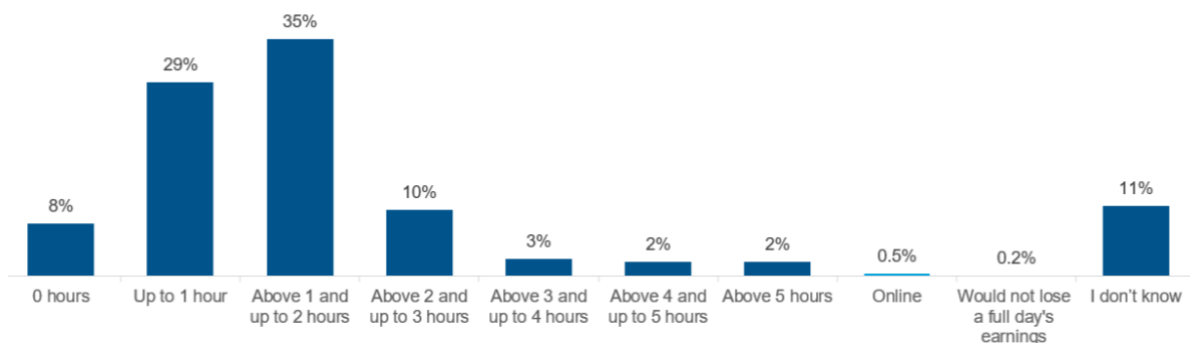
Bars shown in dark blue are the pre-defined response options, the bars in light blue are the coded free responses.

### 2.4 Q16: Time spent travelling to and from training locations

Respondents were asked on average how many hours per day they would save, when travelling to and from training locations, if they did not have to travel to training course locations, to which 657 responded. Nearly all respondents selected one of the pre-defined options and the most selected response was between 1-2 hours (35%, 232), followed by up to 1 hour (29%, 189).

Of the 8 respondents that did not select one of the pre-defined options, several did not provide an alternative time frame. Those that did for example mentioned that courses were online and therefore required no travelling.

Figure 2.4 Overview of travel time that would be saved



Bars shown in dark blue are the pre-defined response options, the bars in light blue are the coded free responses.

### 3 The need for reforms to DCPC

The chapter presents respondent views on the need for reforms to DCPC. It specifically covers:

- Q32: Effectiveness of DCPC currently in meeting its stated aim of improving road safety and the professionalism of drivers
- Q33: Respondents views on whether the DCPC should stay the same, be reformed, or be abolished.
- Q36: Respondent views on the changes needed for DCPC reform.

#### 3.1 Q32: Effectiveness of the DCPC in improving road safety and the professionalism of drivers

There were mixed views on the effectiveness of DCPC currently in meeting its stated aim of improving road safety and the professionalism of drivers. On road safety, of 1,182 respondents, 33% (389) believed it to be effective or very effective, while 38% (451) believed it to be ineffective or very ineffective. Similarly, on professionalism 31% (365) believed it to be effective or very effective and 38% (452) believed it to be ineffective or very ineffective.

There were however differences among respondent groups. Drivers and employers were more likely to believe the training was ineffective or very ineffective in improving driver professionalism and road safety (44%). Training providers were more likely to report that DCPC is currently effective (68%)

Figure 3.1 Overview of responses on the effectiveness of the DCPC in improving road safety

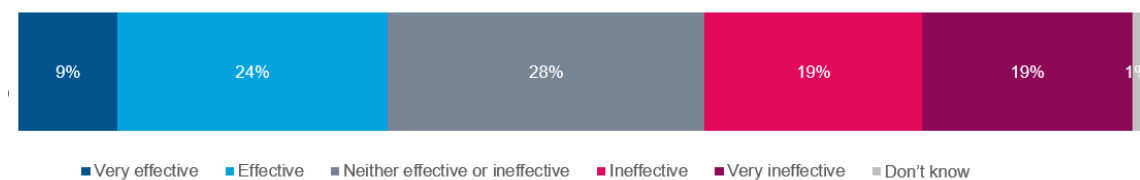
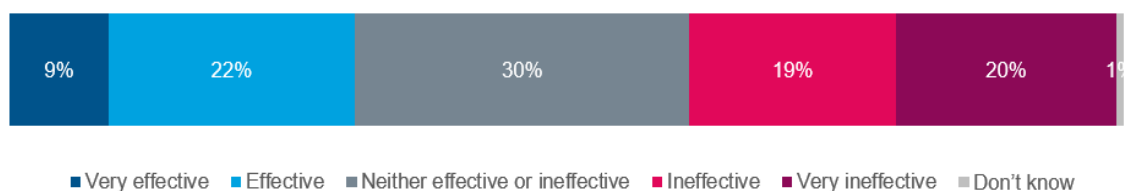


Figure 3.2 Overview of responses on the effectiveness of the DCPC in improving professionalism of drivers



#### 3.1.2 Drivers

A total of 918 drivers explained their response. Current or former professional drivers that did not feel that the DCPC improved driver professionalism and road safety most commonly stated that the training content is not reviewed regularly enough so there is relatively little new content when drivers undertake their mandatory training. As a result, most training does not teach anything new. In addition, a few respondents reported that it lacked practical learning which is fundamental for changing drivers' practice.



Current or former professional drivers that felt the DCPC was effective or very effective in improving driver professionalism or road safety most commonly stated that this was because they felt it enabled drivers to stay up-to-date on rules and regulations. Some also felt that it gave a good grounding in large vehicle driving to new drivers. A few also stated that it provided a good refresher of driving, and that the group discussions and interactions are beneficial in helping drivers learn about good practice.

### 3.1.3 Employers

Overall, 131 employers provided the reason for their response. Those that felt the DCPC is currently effective or very effective (46) in improving driver professionalism and road safety most commonly attributed this to the ability for training to be tailored for specific business needs. This meant it could reflect risks and driving challenges of the environment that the driver worked in. Some also reported that the training enabled drivers to refresh their knowledge and remain up-to-date on legislation.

Employers that felt DCPC is currently not effective (43) in improving driver professionalism and road safety most commonly attributed this to the content being too generic, which meant that the modules were not relevant to some drivers. A few also did not criticise the qualification *per se* but felt that the training has been of a poor standard, and the lack of assessment meant that few drivers revised so they retained the information.

Nottingham City Transport and DPD both felt the DCPC was effective in improving road safety and the professionalism of drivers. Both felt this was because they were able to deliver training in-house and design it so it is contextualised to the road safety challenges for their drivers. Nottingham City Transport explained they had been able to “*target specific issues of concern as they have arisen*”. DPD stated that they receive direct feedback from drivers, so they had “*instant feedback of knowledge levels, thoughts*” and can “*correct any misconceptions*”.

### 3.1.4 Training providers

In total, 164 training providers explained their response to this question. Those that felt DCPC was effective in improving driver professionalism and road safety most commonly stated that this was because it enabled drivers to remain up-to-date on sector legislation and to understand the emerging issues or changes in the industry. As one stated “*drivers are now much better informed of their obligations than they were historically*”. Those that felt it was ineffective most commonly stated that this was because drivers did not always engage in lessons because there is no end of course assessment. A few reported that this disengagement was exacerbated by the training day being too long.

Wincanton and RTITB both felt the DCPC was either effective or very effective in improving road safety and the professionalism of drivers. Wincanton explained that since DCPC’s inception “*driver training has improved, and this flows through to standards of driving and associated compliance*”. They felt that if training is delivered to a high standard, it engages driver buy-in, and competence levels increase. RTITB also felt that DCPC has had a positive impact and cited the feedback they have received from drivers, including from surveys, that echoes this view.

*“For the most part drivers have a good understanding of what is required. However, every single session drivers will say that they have learnt something they didn't know, refreshed their knowledge, allowed themselves to become complacent or updated their knowledge in regard to new laws etc. This would suggest that drivers do forget things over time and refreshing that knowledge and giving them a forum to check their knowledge is essential to keeping roads safe and drivers professional.”* (Training providers/training organisation)

*“As an average, I would say that around 50% of the drivers engage leaving half of each group who are not interested. The attention span of the average driver in a classroom environment does not last for seven hours.”* (Training providers/training organisation)

### 3.1.5 Road safety organisations

There were four road safety organisations which expanded on their views. One felt that the DCPC is currently very effective in its stated aim of improving road safety as it is *“an established structured approach”* which has seen driver knowledge of road safety substantially increase over time. Conversely, one organisation felt it was ineffective because of the content. They explained *“if it is an online course that is not relevant to their job role, which it is most of the time, it is ineffective”*.

RoSPA and PACTS both felt the DCPC was effective in improving road safety. Both explained that it is difficult to casually link road safety improvements with the DCPC but *“the number of accidents involving HGVs has fallen by 68% since 2007, when the DCPC was introduced”*. As a result, PACTs stated they: *“do not support the proposals for the periodic test to remove all mandatory training requirements”*.

### 3.1.6 Other respondents

The 75 other respondents to the consultation largely held similar views to drivers, employers and training providers. Those that felt DCPC was effective in improving the professionalism of drivers and road safety most commonly felt that it enabled them to remain up-to-date on sector developments. Those that did not feel it was effective felt it does not add value because the training was too generic.

ALBUM felt that the DCPC was effective in improving road safety and the professionalism of drivers but felt this was dependent on ensuring the training is relevant and of good quality. Conversely, Unite felt the DCPC was ineffective in supporting the professionalism of drivers and road safety. They stated the modules may not practically link to their roles, as DCPC is required for a range of roles (e.g. bus drivers and HGV drivers) where the legislative and practical driving requirements are different. They therefore suggested that the modules should be more industry and job specific. They would not support a *“move to an [standalone] examination”* but would support assessment following modules to confirm knowledge retention.

*“DCPC highlights less obvious aspects of situations that could contribute to potential accidents or injury. By identifying these, road safety and working practices are improved along with the professionalism of drivers.”* (Other)

*“Far too many poor quality courses, too much repetition within those courses, poor retention of information and no test to prove knowledge gained”* (Other)

## 3.2 Q33: DCPC reform

There were mixed views on whether the DCPC should stay the same, be reformed, or be abolished. Nearly half (48%, 571 of 1,183 respondents) felt that it should be reformed, 39% (457) felt that it should be abolished and 12% (138) believed it should stay the same.

There was however some variation by respondent groups. Drivers were more likely, compared with the overall trend, to report that DCPC should be abolished (52%) while training providers were more likely to report that it should be reformed or stay the same (94%).

Figure 3.3 Overview of responses to DCPC reform



A total of 959 respondents (81%) expanded on the reason for their views. This included 576 current or former professional drivers, 165 employers and 136 training organisations. There were also 78 from other organisations.

### 3.2.2 Drivers

Most current or former professional drivers that felt the DCPC should be abolished stated that the expense and time required outweighs the value it brings. Some also reported that it was a deterrent to join or stay in the industry and a few explicitly stated it was leading drivers with long-term experience to leave the sector as they did not feel they needed training.

Drivers that were in favour of reform mostly felt that the training was useful, but the courses should be shorter, and there should be greater flexibility so it better fits with driver workloads. A few respondents also felt that reforms were needed to increase e-learning options and to make the course content more engaging potentially through a practical element. A few drivers also felt that there needed to be a difference in the training requirement for new and experienced drivers, with the former requiring more in-depth training.

### 3.2.3 Employers

Most lorry/bus/coach driver employers that felt DCPC should stay the same felt the training allowed for the content to be tailored for driver and company needs. It was also mentioned that a single DCPC eliminates confusion for cross-border operators. Those in favour of abolishment, viewed the DCPC as a barrier to attracting drivers and was an unnecessary expense. The respondents which supported reform predominantly wanted changes to bring in greater flexibility in course structure and to improve the “*quality, variety and relevance of [the training] material*”. A few also wanted assessments to ensure the retention of knowledge.

*“We would welcome additional flexibility in terms of modular delivery, and we are pleased that has been proposed.” (Lorry/bus/coach driver employer)*

*“Shorter sessions of higher quality must be encouraged to improve road safety and professionalism.” (Lorry/bus/coach driver employer)*

Nottingham City Transport expressed support for reform. They wanted greater flexibility through modular delivery and agreed with the proposal as, in their experience, the “seven hours over five years structure is a constraint”. In contrast, DPD expressed support for DCPC to remain the same. This was because they receive business benefits which would be lost if the training was replaced with an exam. They felt the training enabled “any misconceptions, ignorance or driver challenges can be dealt with, with immediate effect”.

Translink, an employer of 1,680 bus drivers, responded in opposition to the complete removal of a minimum course length, explaining that it could result in less structured learning, and they suggested that splitting courses could result in ‘skills fade’. They recommended retaining the structured periodic training, but they suggested allowing drivers whose registration has lapsed for a year to be able to take a test to regain their registration.

### 3.2.4 Training providers

Most training providers that supported the status quo felt that the current system works well. Some also felt that standards could be reduced with change and that the proposals could create added complication and confusion, A few also felt it was important to ensure UK standards were in line with Europe.

Training providers supporting reform predominantly wanted more flexibility and for the modules to be shorter. Some respondents specifically highlighted that 7-hour training periods were too long. A few respondents also wanted different ways in which to learn and felt the reforms could lead to course content being more engaging, informative, robust, and quality assured.

*“I think a test-based qualification as suggested in the reforms would add some professional credibility to the qualification, reduce the burden on companies financially and allowing for better use of resource, and quality control should be substantially improved” (Training providers/training organisation).*

Both Wincanton and RTITB expressed support for reform. RTITB conducted their own surveys and found that 63% of road haulage operators supported reform as did 49% of drivers. Wincanton believed that reform to encourage drivers to return to the job market is required but advocated for strict controls so as not to have a negative impact on safety or driving standards.

### 3.2.5 Road safety organisations

Of the four representatives of road safety organisations, three felt that DCPC should be reformed (including RoSPA and PACTS), and one felt that it should stay the same. The one who felt it should stay the same supported the established structured approach because they felt it works well in improving road safety and driver knowledge.

RoSPA and PACTS expressed support for the reforms to increase flexibility, reduce drivers' time commitment, and to lessen financial burden. However, they felt that the changes may potentially create confusion as *“as there is the possibility that drivers could start to complete training to renew the N-DCPC, but then need to switch to an I-DCPC, increasing time taken and costs”*.

RoSPA and PACTS also expressed concern about periodic tests as they felt it could lead to the loss of training tailored to specific driver roles. However, should on-the-job training be included in the reforms, this potentially negative effect may be mitigated. Additionally, PACTS expressed agreement with the establishment of the N-DCPC: *“recognising the UK's obligations under the Trade and Cooperation Agreement (TCA) with the EU, it is a good approach to support the continuation of the existing DCPC regime, rebranded as the I-DCPC”*.

### 3.2.6 Other respondents

Other respondents that felt the DCPC should stay the same mostly felt it was important that the UK has the same certification as other European countries, and that the delivery and content is fit-for-purpose. One respondent also stated that it was more important to change driver mindsets, so they viewed the training more positively than to reform the qualification.

Most other respondents that chose reform felt there was a need to shorten courses, increase flexibility and reduce training costs, while providing an easier pathway for returning drivers. This was echoed by ALBUM which stated, *“the proposed flexibilities are welcomed”*. Those that supported reform also felt it provided an opportunity to improve course quality and reduce repetition.

There were various reasons why other respondents felt the DCPC should be abolished. However, the most cited reason was that it was felt to not provide value for the time and cost incurred.

Unite indicated that the DCPC is currently ineffective in improving both road safety and professionalism of drivers. They stated that it is not adding value for drivers, who often sit through the same module repeatedly as they do not see the value of the training. However, the Driver and Vehicles Standards Agency (DVSA) have recently introduced processes to ensure that the same modules cannot be undertaken more than five times.

Unite recommended a DCPC code of practice to accredit providers and ensure a high quality of training. They would support including an assessment at the end of each CPC module to assess understanding, and they also propose making modules more industry- or job-specific. They would support adding more flexibility in DCPC training requirements, and they recommend that drivers returning to the industry should be able to complete one core module and then renew every year.

## 3.3 Q36: Required changes for DCPC reform

Respondents were asked about the changes they believed to be necessary for DCPC reform. A total of 167 respondents selected 'another issue' than the pre-defined selections. Almost half of the responses by those that selected 'another issue' were from drivers (49%, 82). Responses from training providers made up 26% (43), and responses from employers and other respondents each made up 13% (21).

**Drivers** suggested some alternative changes to the DCPC reforms. This most commonly reported was a reduction in the length of the training, for example to a one-day refresher course, and allowing other relevant courses to be counted e.g. First Aid at Work.

A few drivers also reported a need to:

- Create “*more interesting courses for experienced drivers*”,
- Have courses that cover “*all areas of a professional driver needs, like making an accident scene safe, doing a first aid course*”,
- Requiring drivers to attend a different course each time to stop modules being repeated,
- More on the job training

**Employers** most frequently reported changes to training topics. These included:

- A wider range of relevant training topics being available,
- Greater flexibility and improvements to core subjects to improve engagement,
- Removing the ability to duplicate modules within 35 hours of training ,
- A greater focus on driver knowledge of road safety,
- Allowing other courses and qualifications to count towards the 35 hours, such as formal First Aid.

Nottingham City Transport specifically addressed the pre-defined option of removing the need for drivers to carry a Driver Qualification Card (DQC) when driving in the UK. They felt that the removal of the requirement “*is only positive where it can apply to the entire workforce*”. They felt that if there is a mixture of cards and electronic markers, it would make it difficult for their inspectors, drivers, and timekeepers. Also, if there were to be a disciplinary consequence for failing to carry a DQC card, drivers would perceive the two-option system as unfair.

Most **training providers** mentioned a reduction of the 35 hours of training, with some suggested to 25 hours, and for a focus on “*quality over quantity*”. This view was also echoed by RTITB that stated they would support a reduction in the total number of hours required for DCPC.

Some training providers also felt that an element of practical training or “*on job (in-cab) training*” would see better driver engagement. A few also supported assessment after trainer-led courses and a few felt that other training should be able to be contributed to the 35 hours, e.g., training delivered in house to an employee and other transport related training.

**Other respondents** provided a wide range of responses., which included:

- Improvements to training quality,
- A reduction in the number of training hours,
- Driver assessment following module completion,
- Introduction of a practical element,
- Industry specific content developed by employers to be used as core content,
- To remove the need for drivers to carry DQC as long as an accessible and safe database can be used instead.

### 3.4 General feedback on reform

The general consensus from drivers that submitted an email response was that completing the DCPC was not a good use of their time, and many drivers called for it to be abolished. Several drivers pointed out that there was a lack of distinction over the type of training being undertaken – it is possible to take the same course

multiple times and gain registration. Some respondents were in support of job-specific training that was relevant to them (such as wheelchair accessibility training for PCV drivers), but the lack of specificity of training requirements was widely criticised.

Most drivers criticised the frequency at which they need to complete the certification, stating that it was excessive for experienced drivers. Several respondents were more understanding of enforcing training for newer drivers, but experienced drivers felt that they were not becoming better drivers by taking part in the training. One driver mentioned that updates are necessary when there are changes in regulation, but completing the registration every five years was unnecessary.

Drivers criticised the cost of the DCPC, with the burden felt to be particularly high for freelancers or agency drivers. For drivers wanting to work very few hours, paying to complete the DCPC discourages them when they only wish to pick up occasional shifts. The cost is also off-putting for older drivers and individuals returning to driving. One driver mentioned that they are approaching retirement and will not renew their qualification under the current system, but they would be more inclined to consider part-time work if the renewal process were simpler.

Some drivers felt that the required training was more about making money than imparting useful information. One described the training as a “*money making scheme*”. Some commented that, because there is no exam, drivers do not necessarily pay attention to what is being taught, and instructors may be sharing misinformation with unsuspecting drivers. One respondent argued that, because drivers often have to pay for their own courses, they tend to select the cheapest ones. The cheaper courses are often of poor quality, and so drivers receive little benefit from them.

In terms of the training itself, some respondents mentioned that adding more relevant requirements could make it more useful. One commented that including training on tying down loads, and certifying the first aid course that is given, would be more worthwhile for drivers.

A few drivers were in favour of keeping the current requirements. One respondent had a positive experience of attending courses but suggested that courses should be audited to ensure they meet a certain standard. Another explained that they find the courses to be a useful way of learning about new legislation.

Additionally, one driver pointed out that there should be automatic accreditation for trainers. Even though they also work as a trainer delivering DCPC courses, they are required to attend these same courses they teach in order to receive their accreditation.

The Confederation of Passenger Transport (CPT), sought views from its members and submitted a statement to represent their views. The consensus was that the proposed reform would provide more flexibility for renewing qualifications, and it could help to reduce the driver shortage. Allowing training to be split into smaller chunks could make it easier for drivers to schedule training and could allow for better concentration. However, members generally saw the split of DCPC qualification types as restrictive for coach operators. Domestic drivers who complete the N-DCPC training, and then later decide to drive internationally and complete the I-DCPC training, will [potentially] face double the training requirements (and likely double the cost). They also mentioned that the changes could increase administrative burden for operators in checking qualifications, and it may encourage a ‘two-tier’ I-DCPC vs. N-DCPC system. CPT members were in favour of introducing a periodic test, though they mentioned that many drivers only work in a specific part

of the sector and test content should be appropriate to their role. Members were in favour of increasing the cut-off point since last holding a DCPC from two years to at least five years, in order to make returning to driving less restrictive.

Stobart Transport develop their own DCPC training modules *‘to reflect the dynamic needs of our operations and to focus on legal compliance and driver safety’*. They noted that they have seen the driver shortage ease significantly, and they now have a waiting list to join the organisation. A representative from Stobart expressed concern over using a ‘test’ approach, as this could lead to more undertrained drivers. They stated *‘the majority of our transport governing laws and regulations are still EU so it is inconsistent to change this element in that context. We believe having a two tier process: N-DCPC and I -DCPC, will add complexity and administration for large organizations who operate mainly in the UK but occasionally in the EU.’*

Royal Mail responded in support of DCPC as an opportunity to upskill drivers, and they were in favour of maintaining the requirement for 35 hours of training every five years. They supported the introduction of e-learning, but they argued that measures should be in place to ensure learners are engaging with the content. They responded in favour of relaxing the requirement for returning drivers to complete 35 hours of training, proposing that a reduction in hours would be appropriate.

Bus and Coach NI were not in favour of the new N-DCPC option, as NI operators and drivers tend to travel considerably across the EU border, and the majority of businesses include international services. They also expressed concern that reducing training opportunities for drivers could impact safety.

The Mineral Products Qualifications Council (MPQC), a not-for-profit organisation that represents the Extractives and Mineral processing industry, would support the division of DCPC into N-DCPC and I-DCPC, suggesting that it would increase flexibility in delivering courses for drivers who solely work in the UK. They were also in favour of increasing the provision of e-learning as opposed to classroom learning.

Logistics UK, a large trade association, would not support the abolition of the DCPC. They would, however, support ending the requirement for a minimum course length of seven hours, and they would support removing the requirement for two-part courses to be completed across two consecutive days. They oppose requiring specific course content, arguing that it would be too prescriptive, and they also oppose the inclusion of a pass/fail test at the end of courses. They argue that a periodic test for all drivers will mean that drivers will be expected to answer questions that do not relate to their specific role.

The Road Haulage Association similarly expressed support for increasing flexibility in the delivery of the 35 hours of training (including the use of e-learning and shorter courses on non-consecutive days), but they were not in favour of replacing learning with a periodic test. They emphasised the importance of mandatory training in maintaining safety standards. Members of the association largely supported the ‘return to driving module’ that was proposed.



## 4 Proposals for N-DCPC periodic test

This section presents the results for open questions that examine the introduction of the N-DCPC periodic test. It specifically explores the responses to consultation questions:

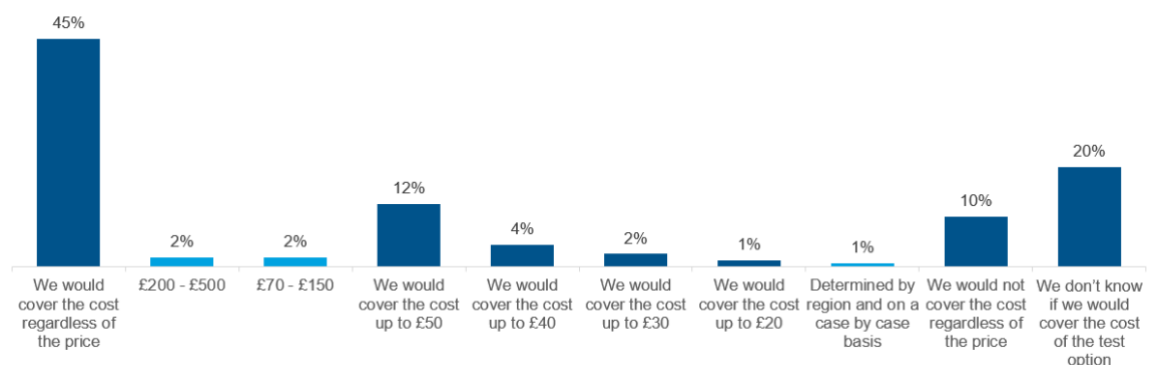
- Q21. The maximum amount of employee costs for undertaking the proposed test option that employers would cover
- Q41. The benefits the proposed changes to introduce N-DCPC periodic test
- Q42. The detrimental effects the proposed changes to introduce N-DCPC periodic test
- Q46 and Q47. Perceived effectiveness of the new periodic test be in ensuring DCPC meets its stated objective of improving road safety
- Q48 and Q49. Perceived effectiveness could the new periodic test in improving the professionalism of drivers
- Q50 and Q51. Effectiveness of the initial test re-sit in ensuring DCPC meets its stated objective of improving road safety
- Q52 and Q53. Effectiveness of the initial test re-sit in improving professionalism of drivers
- Q59. Impact of the new test option in increasing the likelihood of drivers renewing their DCPC
- Q61. Subjects they should be included in the new periodic test

### 4.1 Q21: Costs employers would cover for the proposed test option

When asked to specify the maximum amount they would cover for an employee undertaking the proposed test option, almost half (45%) stated that they would cover any cost regardless of the price, while only 10% stated they would not cover any costs regardless of price. A further 20% stated they didn't know.

When respondents reported costs that were not in the selectable categories, they most commonly selected paying either between £70-£150 or between £200-£500. One respondent stated it would be determined by region and on a case by case basis.

Figure 4.1 Overview costs employers would cover for the proposed test option



Bars shown in dark blue are the pre-defined response options, the bars in light blue are the coded free responses.

## 4.2 Q41: Support for N-DCPC Periodic test

Respondents who supported the proposed changes under the N-DCPC periodic test option were asked for the reasons they thought the changes would be beneficial. A total of 97 respondents did not select at least one the pre-defined benefits (time saving, better work-life balance, cost saving, aiding driver attraction to the industry and retention) and explained the other benefits they saw. Of these, 44 were drivers, 20 were employers and 16 were training providers.

**Drivers** most frequently reported that the test option will provide proof of knowledge, and, as one stated, this will give drivers *“some professional pride”*. A few also stated that it will highlight knowledge gaps and will enable greater productivity as drivers will have less missed time out from work.

Most **employers** similarly felt the test option would demonstrate knowledge. Some also felt it would enable greater driver engagement, that *“people learn in different ways so it will give more options to suit everyone”*, and it may result in a shift towards learning and studying rather than just participating. One respondent also stated that it would *“allow responsible operators to focus on more safety related training that is relevant to the industry sector worked in”*.

Some **training providers** felt the test option would result in high motivation and greater engagement, and that it is a beneficial option for those comfortable doing tests. A few also felt it will increase productivity as drivers will be more available to work, it will help identify knowledge gaps, and that it provides evidence that a standard has been reached and knowledge retained.

## 4.3 Q42: Disagreement with the N-DCPC Periodic test

Respondents who disagreed with the proposed changes under the N-DCPC periodic test option were asked why they thought the changes would not be beneficial. A total of 146 respondents did not select at least one the pre-defined potential barriers (added cost, added time, creation of confusion, result in a shortage of international drivers) and explained the other barriers they saw. This comprised 57 training providers, 50 drivers, 23 employers and 15 other organisations.

### 4.3.1 Drivers

There was substantial variation in the responses from drivers. Some felt that the focus would change to be on passing the test rather than increasing knowledge and learning. A few stated that the test option would have a negative impact on road safety but did not explain why this would be the case. It was also mentioned that failing the test could result in extra costs both financial and through the loss of the driver being able to drive.

In the email responses one driver commented that multiple choice exams may be more difficult for individuals with conditions such as dyslexia and dyscalculia, and that considerations should be made to ensure some drivers do not face discrimination when completing the registration process.

### 4.3.2 Employers

Among the few responses from employers, the most commonly reported issues was a reduction in depth and quality of learning that would arise from the test option. It was felt that it could become a short-term memory test, and that it should not be a

substitute for training. A few also felt that it there could be a shortage of test slots which could create problem.

DPD explained that the test would *“not enable us to deliver key messages to our driving force. This will also remove the ability to talk to drivers about challenges to policy or other concerns with the training content”*.

### 4.3.3 Training providers

Training providers most commonly reported that the test option would have a negative impact on road safety but did not explain why this would be the case. Some respondents also felt that the focus would change to learning to pass a test rather than learning (with the loss of peer-to-peer interaction), which would lower standards. A few respondents felt that if a driver fails a test they could incur and the burden of resits.

*“If the proposed test is along the lines of the current theory test and DCPC Module 2 it is simply way too simple and many drivers would pass, but not really have the knowledge they need.”* (Training provider/training organisation)

A few respondents also discussed the negative impact on training businesses. Some felt it could lead some to close, as a lower cost alternative to 35 hours of training will likely *“lead to a decline in demand... and may lead to an increase in prices to make this a viable offering for training centres”*.

It was also mentioned that the test option doesn't provide development and it could result in a shortage of drivers doing international work, and the creation of *“an added layer of managing DCPC within the UK”*.

RTITB explained that confusion will arise from having two routes (train or test). They said that uncertainty will be created when a driver moves between employers that have taken different routes. They explained that haulage companies may be caught out by *“what they might view as the ‘removal of the need to train drivers’ as Traffic Commissioners would still expect Operators to train their drivers to meet other safety and compliance issues”*. They also reported that the evidence shows unregulated training followed by a test produces poor outcomes.

In the email responses at least twenty training providers gave feedback as part of the consultation. Some of these respondents mentioned the detrimental impact of reducing training requirements on training centres, and some expressed concern that changes would result in drivers having less knowledge. Some training providers mentioned that drivers would no longer benefit from training that was more specific to their role (by being vehicle-specific or company-specific), and some suggested that the required training should be made shorter. Additionally, a training provider explained that many drivers have significant literacy issues and would be disadvantaged by a written test, which could discourage them from continuing their careers.

### 4.3.4 Road safety organisations

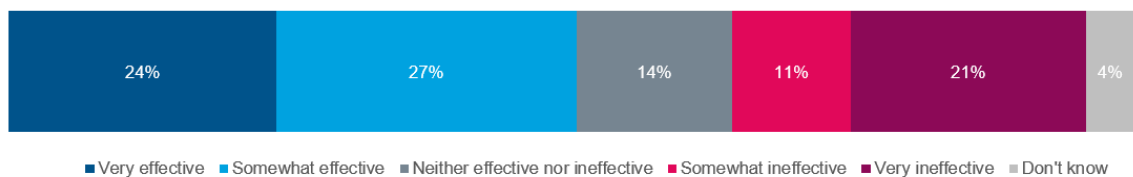
PACTS was the only response from a road safety organisation. They stated that they do not support the proposal of a periodic test as it could negatively impact road safety. They explained that through training *“responsible drivers and employers will choose modules relevant to their specific sector or those that reinforce or update essential safety knowledge needed for daily operations”*. Through a test, which is

used for the entire driver community, drivers will need to study for and answer questions unrelated to their particular field resulting in a “misallocation of time and resources”.

#### 4.4 Q46 and Q47: Effectiveness of the new periodic test in improving road safety

There were mixed views on how effective the new periodic test could be in ensuring DCPC meets its stated objective of improving road safety (Q46). Of the 817 that responded. Half of respondents felt it would be somewhat or very effective and 31% felt it would be somewhat or very ineffective.

Figure 4.2 Overview of responses to how effective the new periodic test could be in ensuring DCPC meets its stated objective of improving road safety



A total of 664 respondents elaborated on the reason for their response (Q47). Responses from professional drivers/previous professional drivers accounted for half, followed by training providers/training organisations (23%, 150), lorry/bus/coach driver employers (17%, 111), others (10%, 64), and road safety organisations (1%, 4).

##### 4.4.2 Drivers

Drivers that felt the new periodic test would improve road safety most commonly reported that it would show proof of knowledge and understanding. Moreover, they felt it would ensure drivers stay up to date on legislation changes, and that it would encourage drivers to improve on their knowledge and skills. A few also mentioned that it could save time and money.

For those who felt it could be ineffective, the responses were varied. Some felt that it could deter drivers from entering into the sector, that it may lead to drivers leaving the sector and that skills are learned from driving so a test “would only confirm abstract knowledge”.

*“The current system has no requirement other than to attend a course, a test would be a more effective way of knowing the driver understands the training given.”*  
(Professional drivers/previous professional driver)

*“Although...in my opinion, most of the important learning you do as a professional driver is done on the job, I can see the benefits of being tested periodically on important core issues in order to satisfy the need for governance of driver safety in general.”* (Professional drivers/previous professional driver)

##### 4.4.3 Employers

The employers that felt the new periodic test would improve road safety generally repeated the responses of other groups. They most commonly reported that it would

ensure drivers maintain a good knowledge of current standards and lead to greater learning and engagement.

Employers that felt the new periodic test would not improve road safety mostly expressed concern that the depth in learning could be reduced. For example, one stated that the *“loss of driver training will be damaging to UK road safety as this is a vital way of keeping drivers up to date with emerging technologies and legislation in addition to company policy updates.”* Some employers felt that there was a disconnect between being able to pass a test and having the necessary knowledge and understanding that is required, as testing can become a *“box ticking exercise”*.

*“The test would provide a quantifiable result to show that the training has been taken in. Though would not be suitable for all drivers, especially those who find a formally test intimidating “ (Lorry/bus/coach driver employers)*

*“Instead of drivers sitting and potentially not taking in the information during training, they will need to be up to speed in order to sit and pass the test. “ (Lorry/bus/coach driver employers)*

*“It doesn't reflect that the driver is safe, only that he knows the answer to a number of questions which are likely to be reused and learned” (Lorry/bus/coach driver employers)*

*“I don't believe the test will be rigorous enough to replace the current knowledge gained. If the testing regime is sufficiently challenging and drivers are required to demonstrate detailed knowledge of a wide range of topics it could add value, but the current theory tests and initial CPC tests leave drivers woefully underprepared.” (Lorry/bus/coach driver employers)*

DPD reported that the new periodic test would be very ineffective as there would be no training unless a driver failed so they would lose the opportunity to *“convey messages that could not be put across in a test scenario”*.

#### 4.4.4 Training providers

Training providers that felt the new periodic test would not improve road safety most commonly reported that the depth of learning that can occur in training would be lost in testing. For example, one would lose the learnings gained from interactive discussion in training. As one stated *“right or wrong questions are very limiting in establishing knowledge without discussion and feedback”*. Some also felt that there may be a change in focus of learning to pass examinations rather than to build knowledge and competence. It was also mentioned that it could cause difficulties for drivers who are not adept at examinations.

Of the training providers that felt the new periodic test would be effective, most stated that it would lead to greater driver engagement and knowledge retention. A few also mentioned that it would help identify knowledge gaps and enable drivers to remain up to date with industry changes.

*“Multiple choice doesn’t lead to understanding, training will be about how to pass the test not dealing with issues of being a professional driver.” (Training provider/training organisation)*

*“The test is not used to confirm learning but rather knowledge about what they already have. There is a minimal amount of assessment to be gained from a 50 multiple choice test. Just because these drivers can pass a test does not make them competent in road safety.” (Training provider/training organisation)*

Wincanton reported that the test would be somewhat effective and explained that experienced and well-trained drivers *“retain knowledge well”* so testing would provide a tangible measure of knowledge level. They felt that if a driver passes the test, they should be able to also recall the knowledge in conducting driving duties.

Conversely, RTITB reported that it could be very ineffective. They explained that it could be perceived as the *“tick in the box’ route”* and that the safety and professionalism of drivers cannot be deduced from a single test conducted every five years. They felt that any pre-training will be centred on passing the test and not on developing driver knowledge and competence, and they believed that *“when compared to classroom training, a test does nothing to protect and improve road safety – there is no opportunity to share case studies, trends or statistics and learn from the experiences of other drivers.”*

#### 4.4.5 Road safety organisations

There were four responses from road safety organisations, and these were mixed. RoSPA reported that the new periodic test would be somewhat effective in improving road safety. They stated that it would need to include questions on road safety (such as drivers’ hours, manual handling and health and safety) if it were to be introduced. However, they were worried that the test would likely contain elements not relevant to all driver roles as it could not be tailored, unlike the training route.

In contrast, PACTS reported it would be very ineffective and do not support the proposal. They stated that, given the understanding that the test may result in significantly less training being offered and available, *“responsible operators will ensure their drivers receive adequate training for their jobs... some irresponsible operators and drivers might attempt to bypass much needed training.”* They also felt that the proposals could enable a reduction in training while still obtaining the right to drive, as *“road safety should not just rely on on-the-job training that could help maintain standards mitigating the loss of these courses”*.

#### 4.4.6 Other respondents

Other responses that felt the new periodic test would be effective in improving road safety echoed the responses from other groups in believing it would ensure competency, ascertain knowledge, encourages study. Also, as one stated, it *“provides a way for drivers who are good at retaining knowledge and prefer a test / exam environment”*.

Respondents that felt it would be ineffective most commonly felt that it would reduce professional development as *“a single test in five years cannot promote continual improvement over a professional driving career”*. A few reported that a test is not

sufficient to reinforce safety behaviours, and that a lot can change over a five year timeframe so therefore drivers would not be up-to-date.

ALBUM reported that it would be very effective as *“training that is well-designed and competently carried out and assessed will improve knowledge and, thus, should make a contribution to professionalism, including road safety.”*

Conversely Unite reported that it would be very ineffective. They stated that the average age of drivers is 50 to 64 and many are likely unaccustomed to examinations and therefore will have difficulty with testing. This could result in drivers failing and *“ultimately add to the ongoing issue of chronic driver shortage”*. It could result in existing drivers being *“expected to work longer shifts with fewer rest breaks which will greatly impact road safety.”*

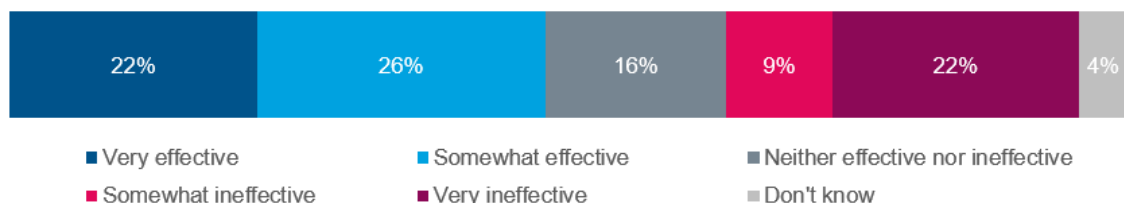
The Community Transport Association (CTA), a charity that represents providers of community transport, was in favour of making completion of the DCPC more flexible, but they said replacing training with a test could result in reduced skill levels for drivers, and they stated that their support of the changes is conditional on DfT ensuring the changes do not lead to a decline in safety.

*“A test is not the right measure for ongoing professional development. It demonstrates that a driver can revise and recall from past experience, but the role of a driver and the nature of their work is always evolving. They need to apply dynamic learning outcomes in a practical way and work towards behavioural change to support road safety efforts, and a test just won't do that.”* (Other respondent)

## 4.5 Q48 and Q49: Effectiveness of the new periodic test in improving professionalism of drivers

Respondents were asked how effective they thought the new periodic test could be in ensuring DCPC meets its stated objective of improving professionalism of drivers (Q48). Of the 815 that responded, nearly half of respondents felt it would be somewhat or very effective and 31% felt it would be somewhat or very ineffective.

Figure 4.3 Overview of responses on the effectiveness of the new periodic test in ensuring DCPC meets its stated objective of improving professionalism of drivers



A total of 631 respondents elaborated on the reason for their response (Q49). Responses from professional drivers/previous professional drivers accounted for 51% (320), followed by training providers/training organisations (23%, 146), lorry/bus/coach driver employers (16%, 103), road safety organisations (>1%, 1) and others (10%, 61).

## 4.5.2 Drivers

Most drivers that felt the new periodic test would be effective in improving professionalisation stated that this was because it would provide measurable outcomes for 'proving' competency. As one respondent stated: *"at present you just have to sit in a classroom for 35 hours and you do not have to absorb any of the course contents. This test would ensure that the driver has that knowledge"*.

Drivers that felt it would be ineffective in improving professionalism gave a variety of reasons. Some felt that passing a test does not equate to professionalism. As one stated *"a paper qualification will not in itself improve the professionalism or skill of drivers. Driving a commercial vehicle is totally different environment to any other work, [therefore] a hands on approach to training would be far more effective, with practical exercises. The downside of course is cost and time"*. A few respondents also stated that there would be more aspects covered in training than there would be in a test, and that it will *"restrict the movement of the labour force as anyone wishing to do Euro work after N-DCPC will be forced to convert to I-DCPC"*.

## 4.5.3 Employers

Employers that felt the new periodic test would increase professionalism most commonly reported that it would ensure driver knowledge of current standards and facilitate greater learning and engagement. Some also stated that it would create a feeling of achievement among drivers and result in greater buy in.

Employers that felt the new periodic test would not improve professionalism gave similar responses to other groups. Some stated that the focus would change to testing and there would be less depth of learning. A few stated that it would not provide continued development and one stated it would damage professionalism because *"operators would undertake the minimum requirements and would stop investing time and effort to improve skills and behaviour."*

DHL expressed concern that, if drivers had the opportunity to take a periodic test rather than undergo training, they would have difficulty ensuring that drivers are kept up to date on recent developments. They expressed concern that a test will not be an appropriate substitute for 35 hours of learning, in terms of allowing drivers to gain knowledge. They also explained that reforming the DCPC and creating a reformed regime will be expensive and will have an administrative burden.

## 4.5.4 Training providers

Training providers that felt the new periodic test would not improve professionalism most commonly stated that the depth of learning would be reduced and that the focus would be on passing the test rather than learning. A few felt the lack of group training would be a major loss, because as one stated, *"to try to instil professionalism requires human interaction amongst peers"*.

The respondents that thought the new periodic test would improve professionalism effective frequently stated that it would provide proof of knowledge and would incentivise learning. A few of the respondents, however, explained it would be effective but alongside training development. As one stated: *"the test should still be backed up by continuous professional development alongside information of change"*.



*“Again, not being in a classroom discussing topics with the trainer and other professionals, sitting a test would stop all engagement. on a DCPC course there are drivers from many different companies all talking about their company policies and best practices, which is very useful and leads to drivers seeing perspectives and dealing with situations. it also lets some drivers know that their operator maybe asking them to carry out a task which is actually illegal, but the driver was not aware of.” (Training provider/training organisation)*

*“Doing a one-off test is very limiting in its outlook & means that drivers only have to learn enough to pass a one-off test at the specific period of time, however regular ongoing targeted training that covers many different aspects of their industry is more appropriate for drivers and continually updates their skills and knowledge” (Training provider/training organisation)*

Wincanton stated the same response to the previous question. They felt it would be somewhat effective and that if drivers demonstrate competency in a test environment they will have the requisite knowledge *“when conducting their role on a daily basis.”*

In contrast RTITB stated it would be somewhat ineffective in improving professionalism. They provided the same response that they did to the previous question. They felt it reduces the professionalism of drivers *“to a once every five years tick in a box”*. They felt that making the industry less attractive and professional would be undermined by weakening the necessity to undertake regular training that is professional and structured. They further stated *“It is significant that only just under half of the drivers we surveyed support the introduction of a ‘test-only’ option... We had many comments from drivers on the importance to them of training in new subjects or to refresh on existing areas of knowledge – indicating their support for structured (but more flexible) training.”*

#### 4.5.5 Road safety organisations

PACTS was the only respondent from road safety organisations. They felt the new periodic test would be ineffective in improving the professionalism of drivers. They reported that while the theory and case studies test, for both the initial test resit proposal and new periodic test would provide a good refresher of knowledge for drivers, in the long term it would not include tailored training as would be the case through the training route. Consequently, drivers would likely receive less training and not all tested elements would be relevant for all driver roles.

#### 4.5.6 Other respondents

Other respondents that felt the new periodic test would improve professionalism most commonly reported that it would demonstrate competency and ensure they have up-to-date knowledge. Other respondents that felt the new periodic test would be ineffective reported that the lack of training would mean drivers have little development, that a multiple-choice question format would be *“limited in scope”*, and that the professionalism of drivers is enhanced through interaction and the sharing of experiences.

Unite felt that it would be very ineffective. They stated they oppose testing and stated that it is not desired by their drivers due to *“the stress of having your livelihood on the line”*. They felt that assessment following learning would be a better measure. They felt this approach *“would greatly improve DCPC and benefit the road*

*haulage and passenger transport sectors both in terms of professionalism and road safety”.*

## 4.6 Q61: Subjects to be included in the new periodic test

Respondents were asked which subjects they think should be included in the new periodic test. A total of 158 respondents made suggestions which were not in the pre-defined list. The suggestions were wide ranging but the most mentioned was first aid (15 mentions), followed by accidents and emergencies (13 mentions), mental health (11 mentions) and Highway Code (11 mentions).

Nottingham City Transport stated that the topics should for example cover changes in the law, technology, and society. The stated that a key benefit of the current system *“is keeping drivers’ knowledge of all aspects of the job up to date”*.

Table 4.1 Overview of subjects respondents think should be included in the new periodic test

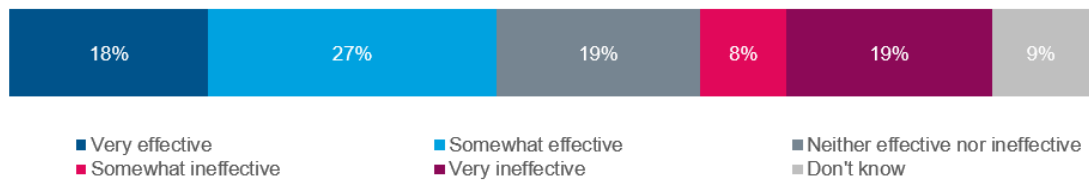
Topic	Count
First aid	15
Accidents and emergencies	13
Mental health	11
Highway Code	11
Vehicle checks/maintenance	9
Vulnerable road users	6
Bridge strikes	5
Vehicle roadworthiness	4
Topics arising from changes in the law, technology, society	3
Modern technology in route planning with professional vehicles	3
Human factors, why humans make mistakes	3
Safe driving in all conditions, including adverse weather	3
Physical driving	3
Load securing	2
Understanding of vehicle technology and road safety requirements in terms of Construction and Use Regulations	2
Prevent criminality trafficking and illegal immigrants	2
Vehicle and load security	2
Driving electric vehicles	2
School transport/safeguarding	2
Rural driving	2
Dangerous Goods Thresholds	2

Vehicle Daily Maintenance	1
Loading and unloading (sector specific)	1
Highway Code compliance relating to large vehicles.	1
Driver conduct hearings	1
Governance in the Logistics	1
Weights and Dimensions of Vehicles and Loads	1
Truck Transmission systems	1
Vehicle Safety Systems	1
Professional Driver and Company Issues	1
Operator licence awareness	1
Hierarchy of responsibility	1
Horse riders on the road cyclists on the road	1
Drivers Rights	1
Tail lift Operation	1
Driving offences and penalties	1
Hazard perception	1
Fatigue	1
Repairs at roadside	1
Weight and size awareness	1
Road Traffic Collision action and statement making	1
Fuel Efficient Driving	1
Record keeping	1

#### 4.7 Q50 and Q51: Effectiveness of the initial test resit in improving road safety

Respondents were asked how effective they thought the Initial test re-sit could be in ensuring DCPC meets its stated objective of improving road safety (Q50) to which 815 responded. A total of 45% (367) of respondents felt it would be very effective or somewhat effective, which is slightly lower than the proportion that felt the new periodic test would be effective. Around a quarter (27%, or 220) felt it would be very ineffective or somewhat ineffective.

Figure 4.4 Overview of responses on the effectiveness of the Initial test re-sit in ensuring DCPC meets its stated objective of improving road safety



A total of 750 respondents explained their response (Q51), of which 539 were drivers, 51 were employers, 132 were training providers and 28 were other respondents.

#### 4.7.2 Drivers

The views of drivers on the initial test resit was similar to their views on the new periodic test. Most that felt it was effective in improving road safety felt it would provide a good revision of knowledge, to enable drivers to keep up-to-date on new developments, and to provide proof of knowledge. A few also reported that it could provide drivers with the ability to understand any gaps in their knowledge.

Some drivers that felt it could be ineffective reported that it could be detrimental for those not adept at examinations and may dissuade drivers from staying or joining the industry. A few also felt that training was better because testing does not necessarily equate to knowledge and learning.

#### 4.7.3 Employers

Employers that felt the initial test resit would be effective in increasing road safety most commonly stated the benefit of tests. They felt tests would ensure driver knowledge is current and it would encourage revision, as well as providing insight into areas a driver has gaps/needs to improve. It was however mentioned that *“the multiple-choice option would be easier for a driver than doing a case study. I think a 3.5 hr assessment with case study would put drivers off.”* Those that believed it could be ineffective had various responses which again related to the value of tests. Some stated it could result in less professional development, while others felt it may not remove retention obstacles.

*“Simply testing and assuming with a pass mark, drivers may not necessarily have had the option to learn new skills, update in the industry standards, or have the chance to engage, ask questions or the opportunity to confirm understanding as currently allowed with periodic training.”* (lorry/bus/coach driver employer)

*“Drivers required to gain the necessary knowledge to be able to pass, more likely to want to learn and improve which leads to a better standard of driver and safer on the road.”* (lorry/bus/coach driver employer)

DPD reported that it would be very ineffective and stated that *“as per previous answers, get the key messages across to all drivers, not just those who fail a test”*.

#### 4.7.4 Training providers

Most training providers that felt the initial test resit would be effective in increasing road safety generally felt that having tests would be beneficial. They most commonly

reported that tests encourage knowledge retention and would encourage revision/refreshing content. Some also felt that tests would highlight gaps in knowledge and one respondent mentioned that feedback should be provided on previously failed answers in order to help development. A few also felt it would provide drivers and employers with proof of knowledge and understanding.

The reasons training providers gave for why the initial test resit would not improve road safety was largely due to their opposition to standalone tests. They commonly reported that assessment in combination with training would be more successful and that a test on its own only confirms existing knowledge and does not provide professional development.

*“I think the initial resit proposal does not differ from the periodic test in terms of learning benefits. I believe the main difference is convenience and cost for the driver. The periodic test might be an easier “sell” to drivers but they likely won’t be given a choice and either option will have similar learning outcomes.”* (Training provider/training organisation)

Wincanton felt it would be somewhat effective. They reported that drivers returning to the industry would bring many years of professional driving experience and safety with them. The test would therefore allow the drivers to demonstrate the level of knowledge they have.

Conversely RTITB felt it would be very ineffective. They stated this would be because the *“coverage of the initial test modules is narrow and does not align with the full Driver CPC Periodic Training syllabus, being related to basic road safety rather than wider considerations of road safety in the context of professional driving.”*

#### 4.7.5 Road safety organisations

Both RoSPA and PACTS stated they would expect that as theory and case studies should be sat, and that this would provide a good refresher of knowledge. However, they felt *“as would be the case with a new periodic test, this would not include tailored training as a training route would. This means that not all elements of the test are likely to be relevant to the driver’s role.”*

#### 4.7.6 Other respondents

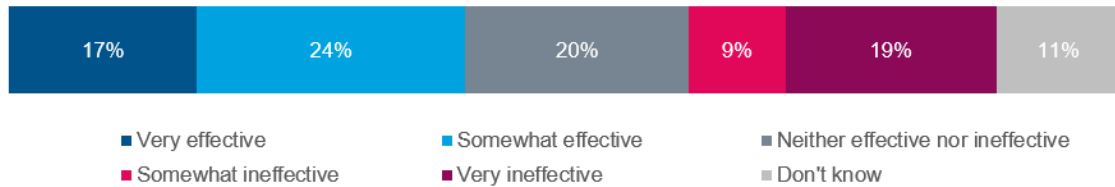
Other respondents that felt the initial test resit would be ineffective in improving road safety most commonly mentioned that resitting a test would not be a means for providing learning. Those who thought it could be effective mostly reported it would encourage drivers to revisit learning material, and could encourage knowledge retention and learning. However, one respondent stated it should not take *“precedence over ongoing professional development”*.

### 4.8 Q52 and Q53: Effectiveness of the initial test resit in improving professionalism of drivers

Respondents were asked how effective they thought the ‘Initial test re-sit’ could be in ensuring DCPC meets its stated objective of improving professionalism of drivers (Q52), to which 806 responded. A total of 41% (331) of respondents felt it would be

very effective or somewhat effective and 28% (230) felt it would be very ineffective or somewhat ineffective.

Figure 4.5 Overview of responses on the effectiveness of the Initial test re-sit in ensuring DCPC meets its stated objective of improving professionalism of drivers



A total of 637 respondents explained their views (Q53), of which 497 were drivers, 42 were employers, 56 were training providers and 42 were other respondents.

#### 4.8.2 Drivers

Those that felt the initial test resit would improve professionalism generally repeated the same answers given earlier in this section on tests (good revision of knowledge, enables drivers to keep up-to-date on new developments, and provides proof of knowledge). Most stated that it would create a focus on memorising rather than learning and that the professionalism of drivers cannot be determined through a test. As one stated, *“no matter how many formal exams the driver has undertaken, it is still up to the individual to behave in a professional manner unsupervised”*.

#### 4.8.3 Employers

Most employers that felt the initial test resit would improve professionalism reported the same reasons they reported that it would improve road safety – it would provide proof of knowledge and increase driver engagement and focus. Those that did not feel it would be effective most commonly stated that a test would not enable drivers to gain the same depth of knowledge as training and that passing a test can not necessarily be equated with professionalism.

#### 4.8.4 Training providers

Training providers that felt the initial test resit would improve professionalism most commonly reported that it would ensure a minimum standard and it would provide proof of competency. A few mentioned it would encourage study and provide awareness of weaker areas to address. A couple of respondents expressed support if *“Mod 2 & Mod 4 questions are covered”*. One respondent stated, *“I think a written test alone would demonstrate the knowledge a person has, but not how to practically use that knowledge”*, while another said it *“will depend on the content of the test and would be an advantage to run a beta trial.”*

The training providers that did not feel the initial test resit would improve professionalism reported similar answers to those given for previous questions. Most felt it would lead to a focus on passing the test which does not necessarily instil knowledge, and a test only confirms existing knowledge it doesn't provide development. Some also stated that it may deter some drivers from staying in the sector, which meant that older or more experienced drivers would *“not have the opportunity to give their acquired wisdom to the younger drivers who in turn miss out on the wisdom and experience”*.

Wincanton felt it would be somewhat effective and restated that when returning drivers, with years of experience, are given an opportunity to demonstrate their level of professionalism in a test scenario they will be able to. In contrast RTITB felt it would be very ineffective as *“the coverage of the initial test modules does not align with the Driver CPC syllabus as it is related to licence acquisition rather than professional driving”*.

#### 4.8.5 Other respondents

Other respondents that felt the initial test resit would improve professionalism most commonly reported that it would provide *“credibility through proof of knowledge”* and ensure knowledge retention and encourage learning. The few that thought it would be ineffective mentioned that they did not believe it would be as good as regular structured training, the focus would be on memorising, and that a test measures knowledge but is *“not a good measure to assess the ongoing professionalism of drivers”*.

### 4.9 Q58: Test option and likelihood of renewal

Respondents were asked whether having a test option would mean they would be more likely to renew their DCPC, to which 428 answered. Over half selected they would (58%, 249) while a third selected that they would not (33%, 140).

Figure 4.6 Overview of responses of whether having a test option would mean drivers would be more likely to renew their DCPC



A total of 324 respondents elaborated on the reason for their response, of which the majority were drivers (66%, 213).

Drivers that felt it would increase their likelihood of renewing their DCPC mostly stated that it was because of the time and cost savings. As one stated *“I don't really have time to sit in a classroom for 35hrs...a test would be better in my view, either you know the answers, or you don't. If you don't, go back to the classroom and learn.”* A few reported that it would provide confirmation that their skills and knowledge were up-to-date and that they would have pride in passing a test. The responses from those not in support were varied but included a dislike of examinations and were planning to renew irrespective.

Among the drivers that felt it would not increase their likelihood of renewing their DCPC, a few explained that the means through which their DCPC would be renewed would not impact them because *“I would have to do whatever was needed to keep the DCPC card current, or I wouldn't be able to work.”* A few expressed a dislike of tests, as one stated *“personally [I] panic and struggle with tests as there's too much pressure”* and other mentions included learning difficulties meaning a testing environment would be unsuitable, a preference for training, and leaving the industry.

## 5 Proposals for N-DCPC reformed training

This chapter examines respondent views to the N-DCPC reformed training. It specifically examined the responses to the following questions:

- Q38. Respondent views on the benefits the proposed changes to introduce N-DCPC reformed training will bring
- Q39. Respondent views on the detrimental effects the proposed changes to introduce N-DCPC 'Reformed Training' will bring
- Q54 and Q55. Support for giving drivers the choice of completing the N-DCPC periodic test' option along with the existing I-DCPC and N-DCPC 'Reformed Training' option
- Q72. Respondent views on how likely the N-DCPC 'Reformed Training' changes are to make it easier to attract and retain drivers that require DCPC
- Q73. Respondent views on the time limit they think should be imposed between completion of the trainer-led course and corresponding e-learning

### 5.1 Q38: Benefits of the proposed changes to introduce N-DCPC reformed training

Respondents were asked if they think the proposed changes to introduce N-DCPC reformed training will be beneficial and in what ways. A total of 103 respondents felt it would be beneficial for another reason than the ones specified (these included for example that they would save time and help attract and retain drivers) and elaborated on their response. This comprised 37 drivers, 31 training providers and 21 employers.

#### 5.1.1 Drivers

Drivers reporting other reasons the changes could be beneficial, mostly felt it would provide greater flexibility that they would bring drivers (and employers). Some also stated that *“shorter training periods will help to maintain concentration and interest”*. A few responses also repeated the pre-defined options.

#### 5.1.2 Employers

Employers highlighted benefits including support for greater flexibility to complete the training. This would make it easier for small businesses to plan. A few also mentioned time and cost savings, for example that *“e-learning can be done ‘on the job’ during working day ‘downtime’ in bite size”*, and that *“it would provide an option for those who are [not] able to cope with testing”*.

*“Removal of the 7-hour minimum course length and 2 consecutive half-day module requirement will offer greater flexibility to employers”* (Lorry/bus/coach driver employer)

Nottingham City Transport expressed support for the change to course design. This will provide them with greater flexibility in regards to planning for when drivers will be training *“and more choice in terms of what we deliver and the channels we use”*.



### 5.1.3 Training providers

Training providers mostly reported additional benefits being more relevant and shorter courses and that drivers will be out of the industry for less time thereby *“improving the productivity of the industry”*.

*“We need to put over 200 drivers off the road when conducting dcpc. The cost to the business is in its 10,000s “ (Training providers/training organisation)*

### 5.1.4 Other respondents

The response from RTITB echoed this view. The drivers they surveyed were generally content with 25-35 hours per year and primarily sought more flexible training, with shorter days and shorter modules. RTITB also felt that *“reformed DCPC training will improve driver engagement”*. They explained *“these changes will lead to better training outcomes and thus to improved road safety and professionalism among drivers.”*

Road Skills Online, a provider of online training, indicated strong support for the proposed changes, and they argued that offering online courses from accredited providers would be beneficial to drivers and their safety.

Abbey Logistics, a transport and logistics company, supported increasing flexibility of course delivery (both online delivery and shorter course lengths), but did not support the proposition to introduce a test, explaining that it would not ensure continuous development and could reduce standards among drivers.

SUEZ Recycling & Recovery UK would support offering two 3.5-hour days as well as seven-hour courses but would not support any other flexible options due to the *‘administrative and operational complexities that would arise’*. They also suggested that seven hours of learning should take place each year, to ensure regular training is taking place. SUEZ is in favour of allowing seven hours of e-learning to count as a full DCPC session, as this would support flexibility for drivers, but they stated that courses would still need to be interactive.

Highbury Communications, a training provider, proposed reforming the DCPC to make training more difficult and to *‘promote greater expertise year-upon-year’*. They suggested that, rather than drivers repeating the same training, they should be developing their skills.

## 5.2 Q39: Detrimental effects of the proposed changes to introduce N-DCPC reformed training

Respondents were asked if they think the proposed changes to introduce N-DCPC reformed training will be detrimental and in what ways. A total of 155 respondents felt it would be damaging for another reason than the ones specified (for example they will lead to confusion or add cost) and elaborated on their response. Nearly half of the responses were from current or former professional drivers (49%, 76), followed by training providers/organisations (28%, 44), lorry/bus/coach driver employers (14%, 21), and other respondents (14%, 21).

### 5.2.1 Drivers

The responses from drivers were varied and some did not address the question or referred to test option rather than reformed training. However, a few respondents felt it would reduce their employment prospects, one explained that DCPC training is often paid for by employers and those that are UK focused *“will probably only pay for the N-DCPC. This will have the effect of significantly reducing the ‘pool’ of available international drivers - and mean that drivers with N-DCPC’s will be significantly disadvantaged if they have to look for a new job and will still end up paying for their own re-qualification.”*

### 5.2.2 Employers

Some employers reported they would create confusion. A few also felt that *“removing this requirement will place training as a secondary importance and under budgetary pressure operators are likely to undertake the minimum to maintain legal competency”*. DPD agreed, stating the sector would *“lose some quality and depth of the training that we currently give”*.

### 5.2.3 Training providers

A few training providers felt the reformed training would be detrimental and they mentioned that it would increase complexity for trainers, and that they could *“water down the standards, instead of improving them”*. A few also felt that training may become rushed which could lead to a reduction in quality. Some training providers were also concerned that they would lose their jobs/businesses.

### 5.2.4 Other respondents

Wincanton explained that creating a two-tier system will provide opportunities for smaller operators to use a cheaper training option. This would place *“all other operations who continue to operate to the higher standard at a disadvantage.”*

Unite welcomed the suggested format but cautioned the scheduling of training. They would like to see training scheduled on consecutive days as they *“strongly believe that if the training modules are split into 3 hours some unscrupulous employers may try to exploit the training times to force workers to train between shifts, this will impact on the drivers’ ability to fully engage in and benefit from the training”*. They believed that conducting training on consecutive days would enable drivers to focus on the training rather than doing modules at irregular intervals.

## 5.3 Q72: Likelihood the N-DCPC ‘Reformed Training’ changes will make it easier to attract and retain drivers

Respondents were asked how likely the N-DCPC ‘Reformed Training’ changes are to make it easier to attract and retain drivers that require DCPC, to which 476 elaborated on their response.

Across respondent groups those that thought the changes would make it easier to attract and retain drivers primarily cited the increased flexibility. They stated for example that courses not being seven hours would encourage attendance and participation, that the shorter courses will enable better work life balance, and that the disruption to working schedules would be reduced. A few also mentioned the

costs would be more manageable. As one stated they would be able to “*spread the cost of training and make it easier to fit training into existing work/family life*”.

Respondents that felt the changes would not make it easier to attract and retain drivers generally felt that the reforms did not go far enough, noting that the training would still take 35 hours to complete, and therefore the cost and time barriers would remain. A few respondents suggested that 7 hours of training every year would be better.

*“Easier to break up training into smaller more manageable chunks, makes learning more flexible to suit the end user”* (Professional driver/previous professional driver)

Nottingham City Transport believed the changes would be neither effective nor ineffective in attracting and retaining drivers as they believed that the DCPC has not been a barrier to the recruitment or retention of drivers. RTITB responded similarly and felt the changes would be neither effective nor ineffective. They reported that they would advocate for the reformed training route based on the feedback they have received but explained that factors such as pay and conditions are significantly more influential in determining driver decision-making than changes would be to DCPC arrangements.

DPD stated the changes would be very effective in attracting and retaining drivers but reported that in accordance with regulations the “*majority will continue to attain the qualification regardless of the method used*”.

PACTS believed the reforms would make it easier for drivers to retain DCPC as they would provide more flexibility in training. They however stated that, as the overall amount of training would not be reduced, it would difficult to state whether the reformed training route would have a significant impact on attracting new drivers.

## 5.4 Q73: E-learning time limits

Respondents were asked what, if any, time limit, between completion of the trainer-led course and corresponding e-learning should be imposed, to which 804 replied. Nearly half of respondents (48%, 388) respondents selected one of the pre-defined options of 30 days or less, just over a quarter (26%, 207) felt that no time limit should be imposed, and nearly a quarter stated that they did not know (22%, 177).

The few that felt another time period, above 30 days, was preferred were asked to provide their views. There were varied responses to this question. A few respondents suggested the time limit should be within 90 days or within 12 months. However, the most frequent response was disagreement with e-learning, with some feeling it should be a pre-requisite to a trainer led course.

## 5.5 Q54 and Q55: Choice of completing the N-DCPC periodic test with the existing I-DCPC and N-DCPC reformed training

Respondents were asked if they would support giving drivers the choice of completing the N-DCPC ‘Periodic Test’ option along with the existing I-DCPC and N-DCPC reformed training option (Q54). A total of 810 responded and 54% responded yes and 29% responded no. The rest said they did not know.

A total of 207 respondents gave their reasons (Q55), of which drivers made up 43% (89), employers accounted for 20% (42), training providers accounted for 30% (62) and others accounted for 7% (14).

### 5.5.1 Drivers

The most common reasons given by drivers was that it could create confusion and result in over complication, followed by that there should only be one option (reported by 15% and 8% respectively).

### 5.5.2 Employers

The employer responses varied but some echoed the view that it could add complication. A few stated that driver preferences may not align with company objectives or operational requirements and that it could create a two-tier system because *“employers and drivers are likely to opt for the test option as less time consuming and cheaper and this would seriously affect the provision of courses required for international drivers”*.

DPD explained that they *“do not consider that this the most effective method of delivering the training that would be best for our business, for the drivers knowledge and ultimately for public safety”*.

### 5.5.3 Training providers

Training providers similarly most frequently reported that the option could create confusion. A few also stated that *“having a split level system creates greater bureaucracy”*, and that drivers will take the shortest, cheapest option and therefore will not gain new skills or knowledge.

### 5.5.4 Other respondents

Wincanton explained that they believe *“creating a two tier system will dilute any training that is delivered, also it will allow some operations to opt for a cheaper training model which will result in lower safety and professional standards.”* RTITB explained that they *“see no case for the introduction of a ‘test only’ route or therefore, a choice of ‘test-only’ as an option route to Driver CPC”*.

Equally Unite believe the complexity in DCPC training should be removed and should be simplified so that the process of accreditation is easy to understand to ease compliance by operators. Additionally, if there is to be a choice, the choice should be made by the drivers rather than the employer.

## 6 Proposals for returning drivers

The chapter explores the consultation responses on the proposals for returning drivers. It specifically examines responses to the following consultation questions:

- Q77 and Q78. Respondent views on whether they support the principle of ‘specific return pathways’ to allow drivers to return to the sector
- Q80. Respondent views on the minimum time, in months, a driver’s DCPC qualification should have lapsed before they can utilise any of the ‘specific return pathways’
- Q81. Respondent views on the maximum time, in months, a driver’s DCPC qualification should have lapsed before they can utilise any of the ‘specific return pathways’
- Q82 and Q83. Respondent views on the pathways they would support and why
- Q85. For respondents that selected none of the pathways, the alternatives they would suggest
- Q88 and Q89. Respondent views on return to driver training alternatives
- Q90. Perceptions of the time period for drivers to complete the remainder of their training after a ‘return to driving’ module in order to gain a 5-year entitlement to drive commercially
- Q91. Respondent views on the subjects they think should be included in the ‘return to driving’ module
- Q93. Respondent views on the number of times a driver should be able to utilise the specific return pathways

### 6.1 Q77 and Q78: Support for the principle of specific return pathways

Respondents were asked whether they support the principle of ‘specific return pathways’ to allow drivers to return to the sector (Q77), to which 814 responded. The majority were in support (74%, 602), 17% (138) were against and 9% (74) were unsure.

Figure 6.1 Overview of support for the principle of ‘specific return pathways’



There were 118 respondents that explained the reason for their negative response (Q78). Of these, current and former professional drivers accounted for 48% (57), training providers/training organisations accounted for 30% (35), lorry/bus/coach driver employers accounted for 13% (15), others accounted for 8% (10) and road safety organisations accounted for >1% (1).

#### 6.1.2 Drivers

Some drivers reported that a limitation was that the proposals do not account for years of experience. They felt that drivers that already had substantial experience had less need for training. However, others questioned whether it was appropriate to have equivalence between returning and current drivers, with one stating: “Surely a

*returning driver is the one that needs the CPC training more than drivers that are currently driving.”*

A few drivers also felt the proposal would result in added complication and questioned the reasoning for the 2-year upper limit in which a qualification can have lapsed. A few cited that the proposal could create a barrier through the cost and time that would be incurred.

### 6.1.3 Training providers

Training providers also most commonly stated that it could result in confusion through the creation of a “two-tiered system”. Some also reported a perceived additional cost, and disparity between the system for current and returning drivers. A few also stated that it could create a lack of safety, as one respondent explained “The single day of training proposed will not be enough to highlight the considerable changes that occur in a potential two-year absence to legislation and regulations.”

*“Very confusing for the driver and employer as difficult to keep track of records and ensure compliance. There is very little enforcement (at the moment) so this will go largely undetected for prolonged periods. When eventually caught it will lead to fines for the driver & operator.” (CPC Driver Training Ltd.)*

*“The second pathway seems like a push to choose the first. The 7 hour module then one module per year is obviously the most efficient route. I also feel your market researchers have not gathered the correct costings for CPC. The average CPC module online is around £200 for 5 modules. We charge £190 for 5 modules and know other others that charge less.” (Atlas Training Solutions)*

### 6.1.4 Other respondents

There was one response from a road safety organisation, and they echoed the view about the disparity between returning and current drivers: “RoSPA would be opposed to allowing someone who had not driven in a professional capacity for a period of time to take less training initially to allow them to return to the sector. If anything, a driver who had taken a break would need more training than someone who had continuously driven and was renewing their DCPC.”

## 6.2 Q80: Minimum length of time a DCPC should have lapsed before drivers can use the return to driver pathway

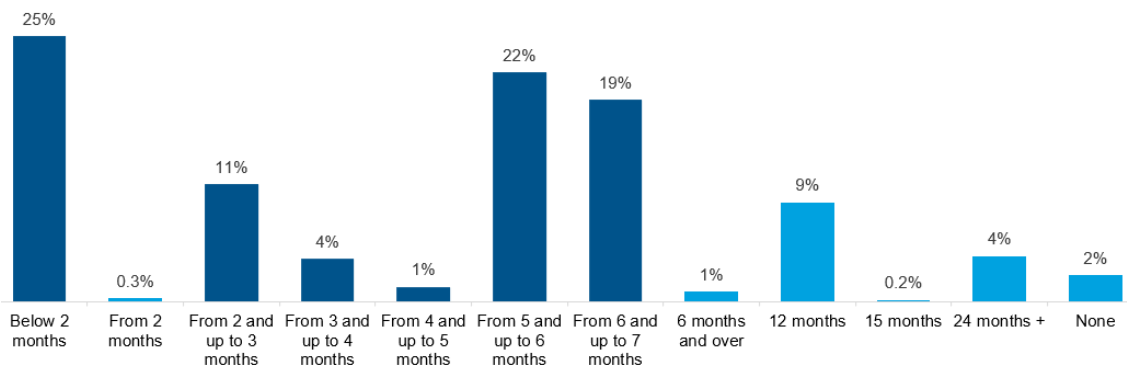
Respondents were asked for their view on the minimum time, in months, a driver’s DCPC qualification should have lapsed before they can utilise any of the ‘specific return pathways’. Of the 670 respondents who answered, the most selected option by respondents was below two months (25%) followed by from 5 to 6 months (22%).

A total of 136 respondents selected another timeframe from the ones offered. Of these, 2% (16) felt there should be no minimum time, 12% (61) supported a 12-month time frame and 4% (28) supported a minimum time frame of 24 months or more. Very few respondents did not give a timeframe but stated that it depends on the driver’s length of service, that it should be on a case-by-case basis, and that it “is dependent upon any hours that have been accumulated that are still valid.”

PACTS stated they would oppose allowing someone who had not driven in a professional capacity for a period of time to take less training initially to allow them

to return to the sector because “given that one of the aims of the DCPC is to improve road safety, if anything, a driver who had taken a break would need more training and assessment than someone who had continuously driven and was renewing their DCPC”.

Figure 6.2 The minimum time a driver’s DCPC qualification should have lapsed before they can utilise any of the ‘specific return pathways’



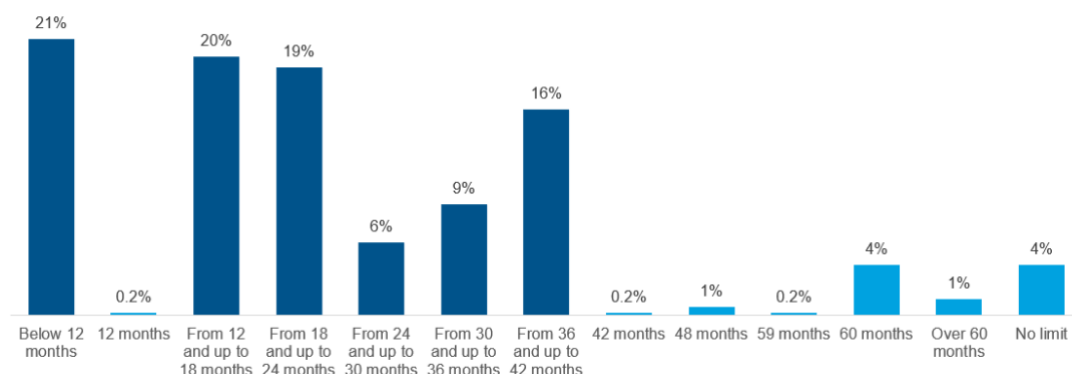
Bars shown in dark blue are the pre-defined response options, the bars in light blue are the coded free responses.

### 6.3 Q81: Maximum length of time a DCPC should have lapsed before drivers can use the return to driver pathway

Respondents were asked for their view on the maximum time, in months, a driver’s DCPC qualification should have lapsed before they can utilise any of the specific return pathways. Of the 664 respondents who answered, the most selected option by respondents was below 12 months (21%) followed by from 12 and up to 18 months (20%).

A total of 88 respondents selected another timeframe from the ones offered. Of these 4% (25) felt the maximum time should be 60 months and 4% (25) felt that there should be no limit. Other responses were given, and these ranged from 12 months to over 60 months. One respondent stated that it should be on a case-by-case basis.

Figure 6.3 The maximum time, in months, a driver’s DCPC qualification should have lapsed before they can utilise any of the specific return pathways



Bars shown in dark blue are the pre-defined response options, the bars in light blue are the coded free responses.

## 6.4 Q82 and Q83: Support for ‘specific return pathways

Respondents were asked which of the specific return pathways they would support (Q82), to which 668 respondents replied. The option of either the N-DCPC periodic test or the return to driver training garnered the most support (selected by 35% of respondents, or 235). The option of return to driver training only received slightly more support (28%, 187) than the N-DCPC periodic test only option (24%, 162).

Figure 6.4 Overview of respondent support for specific return pathways



A total of 257 respondents explained their response (Q83), of which 9 stated they had no comment or were unsure. This comprised 128 drivers, 50 employers, 49 training providers and 28 other organisations.

### 6.4.2 Drivers

Drivers that selected the N-DCPC periodic test most commonly stated that it was because it was the most time and cost effective. As one respondent stated: *“a multiple choice test is far more efficient than a periodic training regime”* and it is *“easier to achieve, quicker turn around and cheaper”*. Those that chose either the N-DCPC periodic test or the return to driver training mostly preferred this option because of the flexibility it brings.

*“The test should be sufficient to encourage the returning driver to study and learn the necessary information, including any updates to regulations.”* (Professional drivers/previous professional driver)

*“Because either of these might encourage drivers back into the industry”* (Professional drivers/previous professional driver)

### 6.4.3 Employers

Employers had similar views to drivers. Most respondents that selected the N-DCPC periodic test felt it had the best chance of attracting drivers due to it requiring less time and cost. Equally those that chose the either/or option felt they offered more flexibility as *“Some drivers will be very unwilling to take a test, having not previously done so, or not for a very long time and this could act as major deterrent to them returning.”*

RoSPA stated that they do not agree with the proposal for specific return pathways and believe that returning drivers should complete the full DCPC, as has been the case in the past.

## 6.5 Q85: Specific return pathways

Respondents were asked which of the specific return pathways they would support (*the return to driver training or the N-DCPC periodic test or either the N-DCPC*



*periodic test or the return to driver training*). Overall, 51 respondents chose none of the pre-selected options. The alternatives they gave included a practical driving test, continuing the current DCPC, a periodic test and a practical driving module, and keeping the current annual training time but focusing on driver hours and regulations.

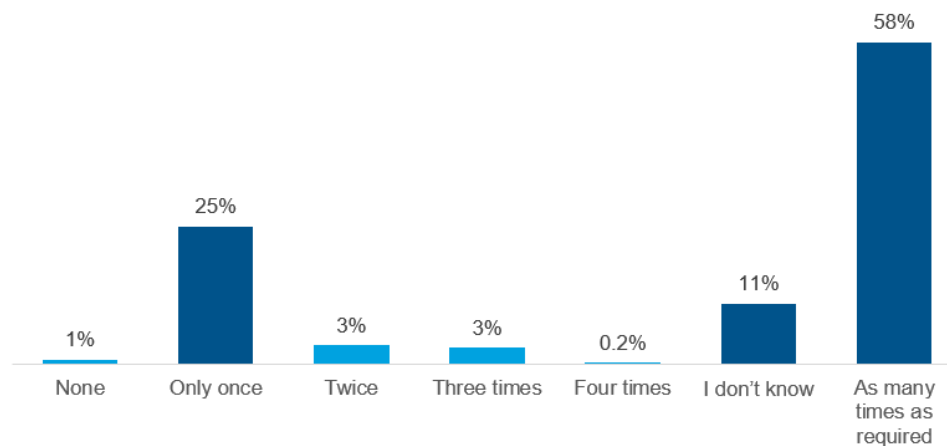
Wincanton stated that they would support “*working with the EU to develop a periodic test to allow returning drivers to demonstrate competency in safety and professionalism. This would then allow the driver to return to the work force with a specific window then granted to allow attendance on an approved I-DCPC courses.*”

## 6.6 Q93: Using specific return pathways

Respondents were asked how many times a driver should be able to utilise the specific return pathways (Q88). Of the 641 respondents who answered, the most selected option by respondents was as many times as required (selected by 58%), followed by only once (selected by 25%).

A total of 57 respondents selected another timeframe from the ones offered (Q89). Of these, 3% felt a driver should be able to utilise the 'specific return pathways' two times or three times, 1% felt that this should not be an option and <1% felt that it should be used four times. A few respondents did not specify a timeframe but gave a longer opinion. These included that it should not be possible to do more than one consecutively, once in every five years, and that it should be age and ability based.

Figure 6.5 Number of times a driver should be able to utilise the specific return pathways



Bars shown in dark blue are the pre-defined response options, the bars in light blue are the coded free responses.

## 6.7 Q87: Return to driver training

Respondents were asked their preferred option regarding driver training (the remainder of training to be completed every year, for a maximum of 7 hours, giving an annual DCPC entitlement, the 28 hours of remaining training is completed at any point within the five-year DCPC entitlement). The most frequently selected option was that the remainder of training be completed every year, for a maximum of 7 hours, giving an annual DCPC entitlement, which was selected by 43% (173) of all respondents.

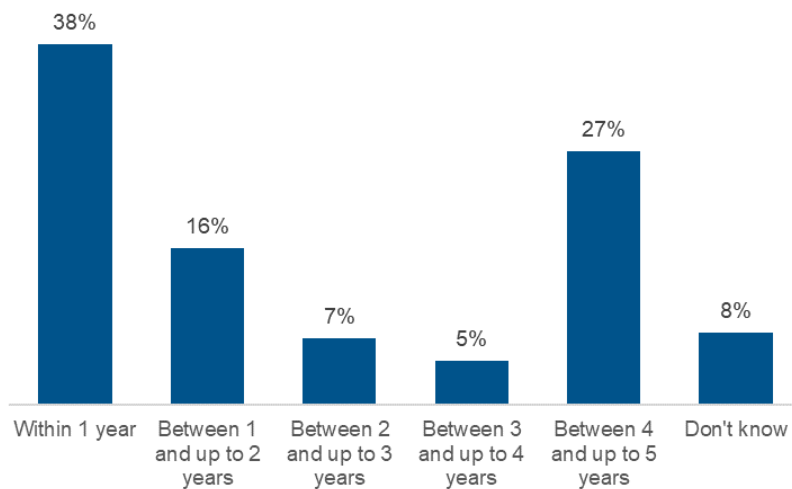
There were 62 respondents that chose none of these options. The responses were varied. They included a 1-day refresher course covering drivers' hours, health and

safety and first aid followed by a test, a test and driving assessment, an initial course covering the minimum requirements (drivers' hours, road safety) and for the rest to be completed the following year.

## 6.8 Q90: Return to driver training requirement

Respondents were asked in what time period a driver should complete the remainder of their training after a 'return to driving' module in order to gain a five-year entitlement to drive commercially. Of the 398 respondents who answered, the most selected option by respondents was within 1 year (selected by 38%), followed between 4 and up to 5 years (selected by 27%).

Figure 6.6 Time period a driver should complete the remainder of their training after a 'return to driving' module



A total of 26 respondents did not choose one of the timeframes listed and instead provided a free text response. The responses were varied but the most frequent response among these was within the five years a driver should undergo seven hours of training every year. Others respondents stated five years, the same as the card entitlement, a one year entitlement for every one day's training, and that they should undergo the full 35 hours prior to returning to driving commercially.

Nottingham City Transport explained *"we train existing PCV holders for several weeks (classroom-based compliance and supervised driving in-service). We will continue to do this"*.

SUEZ Recycling & Recovery UK supported introducing a seven-hour 'return to drive' module for drivers whose qualifications card has expired in the past two years.

## 6.9 Q91: Return to driver subjects

Respondents were asked what subjects they think should be included in the 'return to driving' module and 75 respondents suggested topics not included in the pre-defined list. The most suggested was the Highway Code (10 mentions), followed by vulnerable road users, first aid, driver safety and wellbeing, and vehicle checks and roadworthiness (all with 5 mentions each).

Table 6.1 Subjects respondents believe should be included in the 'return to driving' module

Topic	Count
Highway code.	10
Vulnerable road users	5
First aid	5
Driver Safety and Wellbeing	5
Vehicle checks and roadworthiness	5
Bridge strikes	4
How to Undertake Walkaround inspections	3
Accident procedures	3
Changes to Legislation.	2
Improvement in technology	2
Licencing weights and dimensions	2
Daily Vehicle Checks	1
Winter driving	1
Vehicle technology and safety with regard to Construction and Use Regulations	1
Truck Transmission systems	1
Vehicle Safety Systems	1
Vehicle and load security	1
horses on the road and other users	1
Actual driving	1
Rural driving	1
Hazard Perception	1
Repairs	1
Dangerous Goods Thresholds	1

Additionally, in the email responses, some respondents mentioned that adding more relevant requirements could make training more useful. One commented that including training on tying down loads, and certifying the first aid course that is given, would be worthwhile for drivers.

## 7 Changes to allow for short term extensions and exemptions in exceptional circumstances

This chapter examines the responses to proposals to allow short term extensions and exemptions in exceptional circumstances. It specifically examines the responses to the following questions:

- Q94. Respondent views on the circumstances that should trigger short term extensions
- Q95. Respondent views on the circumstances that should trigger short term exemptions
- Q97. Respondent views on what would short term extensions mean
- Q98. Respondent views on what would short term exemptions mean
- Q99. Does the extension period seem like an appropriate amount of time?
- Q100. Does the exemption period seem like an appropriate amount of time?
- Q101. In your opinion should short term exemptions only be offered to those who previously held a DCPC qualification and let this lapse and why?
- Q102. For this exemption how long, in your view, is an acceptable period for the qualification to have lapsed in months?

### 7.1 Q94: Changes to allow for short term extensions in exceptional circumstances

Respondents were asked the circumstances they think should trigger short term extensions, to which 105 respondents described others than those listed (a pandemic, national or international emergency, availability of test or training provision, circumstances that would impact on the normal operation of the road transport industry). Over half of the responses were from drivers (53%, 56), followed by training providers/organisations (18%, 19), lorry/bus/coach driver employers (16%, 17), other (10%, 11), road safety organisations (2%, 2).

Drivers most frequently cited driver ill health and war. A few also reported national strikes, driver shortage, and that extensions should not be allowed. However, many repeated options that were already listed or provided answers that did not relate to the question.

Training providers and employers mostly stated reasons such as driver personal circumstances, including driver illness, national disasters, civil unrest, and that extensions should not be allowed.

Nottingham City Transport stated that national driver shortage should trigger short term extensions and ALBUM stated that local emergencies should. Unite felt that exemptions and exceptions should apply only on rare occasions and should be *“agreed by industry stakeholders including trade unions”*.

### 7.2 Q95: Changes to allow for short term exemptions in exceptional circumstances

Respondents were asked the circumstances they think should trigger short term exemptions. A total of 70 respondents offered different circumstances to those listed in the consultation (a pandemic, national or international emergency, availability of test or training provision, circumstances that would impact on the normal operation of the road transport industry).

There were a mix of responses to this question. Some respondents stated a state of emergency, food industry crises, national driver shortage and personal circumstances including ill health. Nottingham City Transport and ALBUM gave the same answers as the previous question (national driver shortage and local emergencies).

### 7.3 Q97: Short term extensions and remaining in the sector

Respondents were asked if short term extensions would mean they or their drivers remain in the sector for the duration of the extension. A total of 156 respondents addressed this question of which current and former professional drivers made up over half (58%, 91), training providers/organisations made up 19% (30), lorry/bus/coach driver employers made up 17% (27) and others made up 5% (8).

Over half (59%) of drivers stated that they would remain in the sector for the duration of the extension. They explained that it would allow service to be maintained, benefitting both the drivers and employers, and would help alleviate driver shortage. A few also stated that if there was a national issue preventing DCPC renewal, then they should not be penalised. There was very little data to draw on responses that were not in agreement.

Among the 27 employers that expanded on their answer, those that said it would, stated that it would ensure there was less risk of circumstances outside of their control having a negative impact. Some reported that it would also allow service to be maintained. One respondent stated that it should only be used in exceptional circumstances and should not to be abused.

Nottingham City Transport stated that *“drivers are concerned with pay, hours, shifts and the immediate stresses of the driver's role. They are not put off by DCPC. It is never cited in exit interviews.”* Equally DPD believed that this would not affect drivers' decisions to stay in the sector.

### 7.4 Q98: Short term exemptions and remaining in the sector

Respondents were asked if short term exemptions would mean they return in the sector for the duration of the exemption, or if the drivers previously in their employ would return to the sector for the duration of the exemption. A total of 121 respondents addressed this question.

Of the 68 drivers that responded to this question, nearly two-thirds (61%) stated that they would. The reasons for this varied. Some stated that it would reduce pressure during national emergencies, while others stated that flexible options encourage retention, and it *“would encourage drivers who left the haulage industry maybe to rethink and start back again”*.

The 22 employers that responded provided a range of responses for example that it would be dependent on the circumstances, that exemption would not affect the decision as drivers leave for different reasons, not just DCPC, and that there should be no exemptions.

Nottingham City Transport and DPD repeated their responses from the previous question.

## 7.5 Q99: Length of extension periods

Respondents were asked whether the extension period seem like an appropriate amount of time. Of the 874 respondents who answered, 63% felt the extension period did seem like an appropriate amount of time, 19% felt it wasn't and 18% did not know.

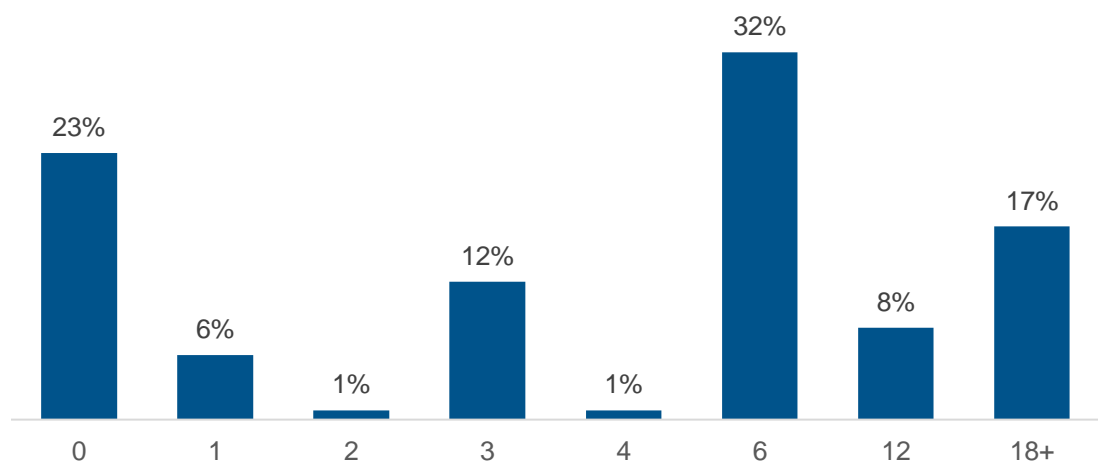
Figure 7.1 Overview of responses to the proposed extension period



Of the respondents that responded in the negative, 124 gave an alternative timeframe. Of these, around a third (32%) felt 6 months to be appropriate and 23% felt that there should be no extension period. A further 17% believed it should be 18 months or more.

A few respondents gave comments instead of a timeframe. One felt that the timeframe should not be fixed, another felt there should be total exemption for “for older, time served drivers”, and another stated it should be dependent on the circumstances. DPD agreed with the latter.

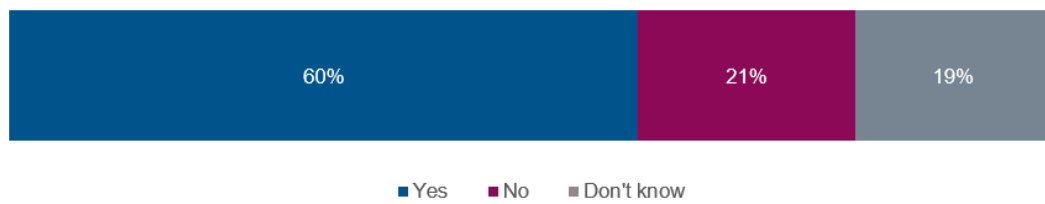
Figure 7.2 Overview of other timeframes given



## 7.6 Q100: Maximum length of exemption periods

Respondents were asked whether the exemption period seem like an appropriate amount of time. Of the 875 respondents who answered, 60% felt the extension period did seem like an appropriate amount of time, 21% felt it was not and 19% did not know.

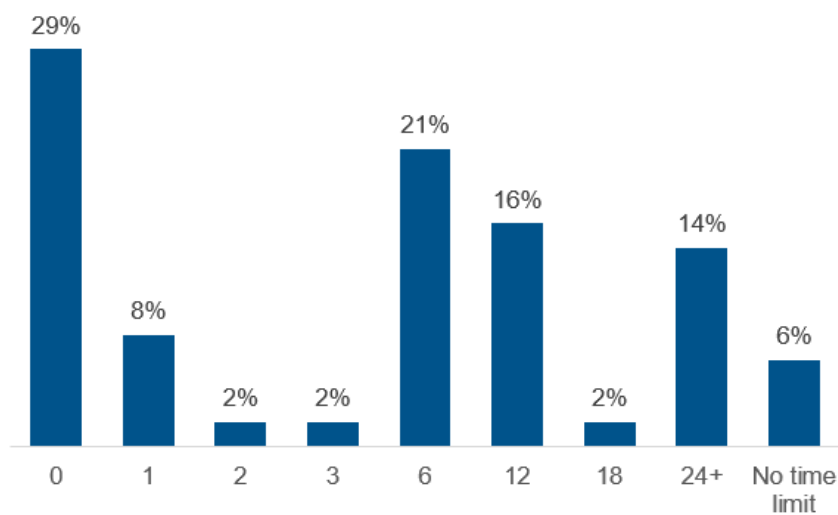
Figure 7.3 Overview of responses to the proposed exemption period



Of the respondents that said no, 124 gave an alternative timeframe. The timeframes given were varied. A total of 29% (32) felt there should be no exemption period, and 21% (24) felt it should be 6 months. A few respondents stated they disagreed with exemptions and felt that exemptions should not be permitted. This was also the view given by DPD.

The more general comments in this section were mostly that it should be considered on a case by case depending on circumstances. One training provider stated *“the requirement for exemptions, it seems to me, would be dictated by market forces and events that are beyond our control. Their duration is unpredictable and so perhaps the duration of an exemption should not be mandated but driven by the events that necessitated it (like Covid for example).”*

Figure 7.4 Overview of other timeframes given



## 7.7 Q101: Short term exemptions

Respondents were asked if short term exemptions should only be offered to those who previously held a DCPC qualification and let it lapse. The majority responded yes (69%) and 22% responded no.

Figure 7.5 Overview of responses on short term exemptions



A total of 269 respondents gave the reason for their response. Those in favour principally cited that they will already know the industry and will have demonstrated the competence required, however a few stated that a lapse time frame would need to be in place and should be recent. The reasons for those against included legal requirements may have changed and that it *“defeats the concept and purpose of increasing road safety”*.

Nottingham City Transport reported that it depends on the specific circumstances. RTITB had a similar view and explained that the complexity of the Covid-19 pandemic, for example, showed that it would not be appropriate to apply generic minimum and maximum time periods for extensions or exemptions as *“each ‘force majeure’ case will need to be handled and judged as it evolves.”*

## 7.8 Q102: Qualification lapse

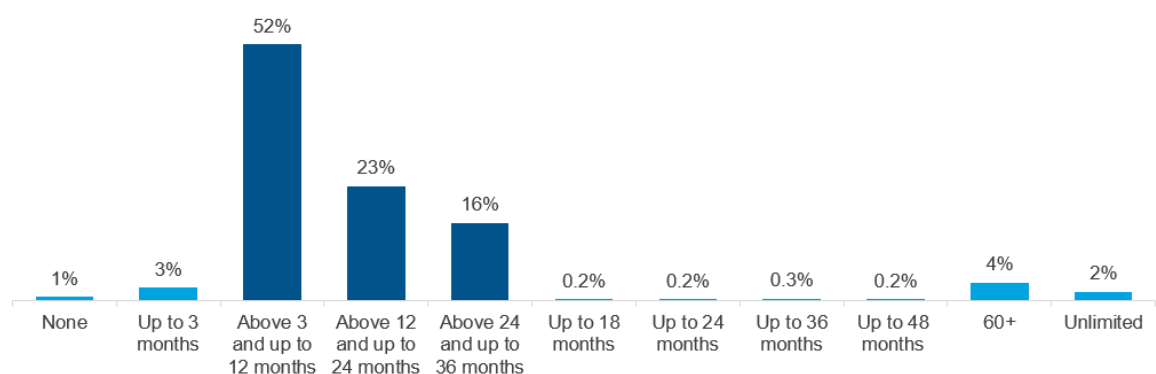
Respondents were asked, how long is an acceptable period for the qualification to have lapsed for short-term exemptions. Of the 606 respondents who answered, the most selected one of the pre-defined options, of which over half that provided a timeframe selected ‘above 3 months and up to 12 months’ (52%, 308).

A total of 74 respondents gave a timeframe outside of those that were pre-defined. These varied considerably. A few felt that no short-term exemptions should be given while a others felt the timeframe should be unlimited and a few felt the timeframe should be up to 3 months.

Respondents that provided comments instead of a timeframe mostly stated that it should be evaluated on a case-by-case basis, taking into account length of service for example, and it should be dependent on the length of the emergency.

PACTS explained that they *“would suggest limiting the exemptions and extensions to those drivers who previously held DCPC and have had adequate experience and training in the past. This would ensure safety and professionalism even in emergency and exceptional circumstances such as health pandemic and driver shortages.”*

Figure 7.6 Overview of responses on the acceptable period for the qualification to have lapsed for short-term exemptions





## 8 Recognition of non-UK qualifications and electronic DQCs

This chapter explores the responses to proposals for the recognition of non-UK qualifications and electronic DQCs. It specifically examines the response to the following questions:

- Q103 and Q104. Support the creation of an *exchange scheme* for non-GB and non-NI qualifications
- Q105 and Q106. Support the creation of a *recognition scheme* for non-GB and non-NI qualifications
- Q107 and Q108. Respondent view on replacing DQC replaced with an electronic version

### 8.1 Q103 and Q104: Creation of an exchange scheme

Respondents were asked if they would support the creation of an exchange scheme for non-GB and non-NI qualifications (Q103). Of the 880 that responded to the question, 50% (444) stated that they would support the creation of an exchange scheme and 32% (279) stated they would not.

A total of 504 respondents gave the reason for their response (Q104). Of these, 53% (267) were drivers, 14% (69) were employers and 24% (120) were training providers.

#### 8.1.1 Drivers

Drivers that supported the creation of an exchange scheme mostly stated they did so because they felt it would improve mobility and flexibility. As one stated *“because we need to rationalise and harmonise these qualifications as much as possible to keep traffic moving and cut out the red tape”*. Some respondents reported that it would help attract and retain drivers although a few felt that only equivalent or higher exchanges should be included.

Drivers that disagreed with the creation of an exchange scheme predominantly did so because they felt that other schemes may not be directly interchangeable - driving standards may differ and training and testing standards may differ. This would result in a lack of consistency. A few also stated that it could create a complicated process, it would need effective monitoring, and could undercut the existing workforce. One respondent also queries if it was appropriate to have a scheme that was not reciprocated.

#### 8.1.2 Employers

Employers that supported the creation of an exchange scheme also most commonly stated that they did so because they felt it would improve recruitment and help retain drivers. Those that disagreed mostly felt that other schemes may not be directly comparable which would reduce standards.

Nottingham City Transport explained that *“if drivers have taken an appropriate and recognised form of periodic training it should provide a baseline for them to 'fit' the UK periodic training system. Let's respect and value international qualifications and enable new colleagues to join the UK sector”*. DPD were also in support as it would provide smoother passage for drivers to be able to operate internationally.

### 8.1.3 Training providers and other respondents

Training providers and other respondents had similar views. Those that supported the scheme felt it would aid recruitment and provide flexibility. However, a few also stated that the standards would need to be equivalent or higher to maintain road safety levels. Those that did not support the scheme mostly felt that the quality of equivalent schemes cannot always be ascertained and that “*each country has differing road conditions and traffic laws*”.

There were two responses from road safety organisations. One felt that it would be a complicated system to manage and stated that the current system works well. PACTS stated that they would support the creation of an exchange scheme as it could make it easier for drivers from mainland Europe to drive in the UK and could also help make up for the HGV driver shortage of in the UK.

Wincanton stated that they would be in support if the standards are equivalent or better. Similarly, Unite would be in support if international standards were equivalent to those of the EU.

ALBUM stated that “provided that drivers can demonstrate the necessary competences, the recognition of alternative, relevant qualifications would be a useful option”.

## 8.2 Q105 and Q106: Creation of a recognition scheme

Respondents were asked if they would support the creation of a recognition scheme for non-GB and non-NI qualifications (Q105). Of the 881 that responded to the question, 53% (464) stated that they would support the creation of a recognition scheme and 26% (232) stated they would not.

A total of 383 respondents explained the reason for their response (Q106). Of these, 52% (198) were drivers, 15% (56) were employers and 25% (97) were training providers.

Similarly to the previous question, those that expressed support for the proposal stated that they did so because they felt it would facilitate labour mobility and improve recruitment. Those that did not support the scheme felt that international differences would lead to a reduction in professional standards and road safety. A few respondents suggested testing to ensure this.

RTITB expressed their support as it could increase the pool of qualified drivers. Equally PACTS and Unite expressed agreement and reiterated their responses to the previous question.

## 8.3 Q107 and Q108: DQC replacement by an electronic version

Respondents were asked for their view on having the DQC replaced by an electronic version. Of the 886 that responded to the question, 57% (508) stated that they would support the creation of an electronic DQC and 22% (191) stated they would not.

A total of 620 respondents explained the reason for their response. Of these, 52% (321) were drivers, 16% (100) were employers and 23% (140) were training providers.

Across respondent groups, those that expressed support mostly did so because they felt it would be more practical in that it removes the risk of the DQC being lost or stolen and the inconvenience of carrying it. Some respondents also mentioned that its more cost effective and would provide easier visibility for employers for checks and monitoring.

Respondents that were against an electronic DQC mostly felt the physical version provided reassurance in that its easier to produce at roadside or to show to employers. Some also felt it is less open to fraud. A few respondents also stated that an electronic DQC was more difficult to use for drivers that were not computer literate, that they felt pride in carrying the physical card. One respondent also questioned how it would be possible to monitor the expiry date.

There were a few respondents that expressed support for both options to be in-place. As one stated *“because there are arguments for and against both the card and the digital option. Why is there not an option to have both?”*.

Nottingham City Transport stated that they were not in support because they need a single, uniform form of licence across all PCV drivers as it keeps administration simpler and is fairer. Similarly, RTITB found in their survey among their LGV drivers, 51% want to retain a physical card, and only 25.4% supported an electronic alternative.

ALBUM stated that they were neither for nor against due to differing opinions. They reported that *“some employers would welcome the holding of a physical qualification as this would align national and international requirements where employers have both types of operation. Similarly, there is sense that a physical qualification provides an indication of professionalism.”* However, they stated that some employers would also welcome using technology.

RoSPA, DPD, and PACTS are in support of the DQC being replaced by an electronic alternative as it would mitigate the risk of DQC cards being lost or stolen.