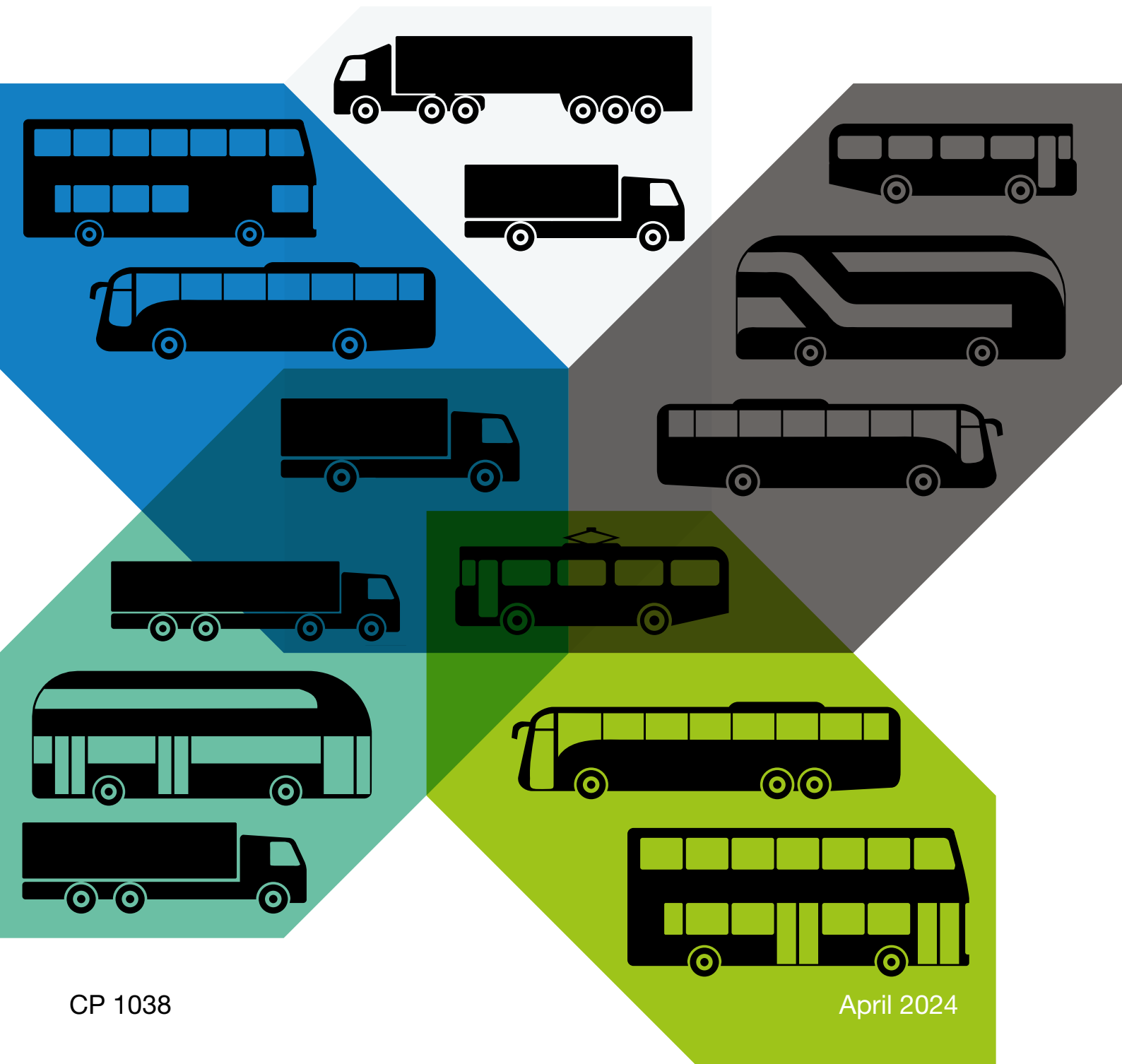




Department
for Transport

Amendments to Licensing Restrictions: Bus, Coach and Heavy Goods Vehicles (HGVs)





Amendments to Licensing Restrictions: Bus, Coach and Heavy Goods Vehicles (HGVs)

Presented to Parliament
by the Secretary of State for Transport
by Command of His Majesty

April 2024



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How to respond

The consultation period will last eight weeks from the date the consultation is published. Please ensure that your response reaches us before the closing date. If you would like further copies of this consultation document, it can be found at <https://www.gov.uk/dft#consultations> or you can contact the Bus Funding Team if you need alternative formats (Braille, audio CD, etc.).

Please send consultation responses to:

Name: Bus and Coach Driver Shortages, Bus Funding Team

Address: Department for Transport, Great Minster House, Floor 3, Bus Funding Team,
33 Horseferry Road, London, SW1P 4DR

Phone number: 0300 330 3000

Email address: busandcoachdrivershortages@dft.gov.uk

When responding, please state whether you are responding as an individual or representing the views of an organisation. If responding on behalf of a larger organisation, please make it clear who the organisation represents and, where applicable, how the views of members were assembled.

Freedom of Information

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the Freedom of Information Act 2000 (FOIA) or the Environmental Information Regulations 2004.

If you want information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the Data Protection Act (DPA) and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

Data Protection

The Department for Transport is gathering evidence on the possible impacts the proposals in this consultation could have on addressing the bus, coach and HGV driver shortages. In addition, the consultation also seeks to better understand the impact these proposals might have on road safety and insurance premiums paid.

This consultation and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. If your answers contain any information that allows you to be identified, DfT will, under data protection law, be the Controller for this information.

As part of this consultation, we're asking for your name, address and email address. This is in case we need to ask you follow-up questions about any of your responses. You do not have to give us this personal information. If you do provide it, we will use it only for the purpose of asking follow-up questions.

DfT's privacy policy has more information about your rights in relation to your personal data, how to complain and how to contact the Data Protection Officer. You can view it at <https://www.gov.uk/government/organisations/department-for-transport/about/personal-information-charter>.

To receive this information by telephone or post, contact us on 0300 330 3000 or write to Data Protection Officer, Department for Transport, 3rd Floor, One Priory Square, Hastings, East Sussex, TN34 1EA.

Your information will be kept securely on a secure IT system within DfT and destroyed within 12 months after the consultation has been completed.

Introduction

In the financial year ending March 2022, over 3 billion bus journeys were taken in Great Britain (GB). This was 3 times the number of rail journeys taken in the same period. Bus journeys enable people to go to school, access training, leisure, work, and essential appointments, like medical care.

Before the COVID-19 pandemic, the Confederation of Passenger Transport (CPT), the main coach and bus industry representative body, estimated (based on National Travel Survey data) that 500 million passengers made a journey by coach each year. Coach journeys are a key part of the UK's tourism economy, they enable long-distance transport connectivity, and are also used to transport many children to school.

Buses and coaches provide essential transportation for their passengers across Great Britain.

Bus and coach driver shortages

The number of drivers the bus and coach sectors need to provide their services properly and safely, as estimated by CPT, is around 100,000 drivers across Great Britain.

Before the COVID-19 pandemic, CPT estimated that the driver shortage for bus and coach services was between 1 and 2%. However, in September 2021, the bus and coach sectors told the Department for Transport (DfT) they were experiencing a driver shortage that was impacting their ability to run services.

This driver shortage continued to increase throughout 2022, as demonstrated in CPT's September 2022 survey. This suggested 9.3% of bus driver positions and 15.9% of coach driver positions were vacant.

However, ongoing changes to both service provision and the number of routes being operated could affect the shortage in ways that are not reflected in the figures.

CPT's quarterly driver shortage survey suggests the peak of the driver shortage has passed and is now less intense. However, CPT's latest driver shortage survey – completed in September 2023 – suggests the bus driver shortage was 6.6% and coach driver shortage was 13.6%, indicating a persistent shortage of drivers.

In the same survey, national and regional variations were indicated too. Wales is experiencing a much higher bus and coach driver shortage than Scotland. In England, the North-East and the North-West of England are seeing far lower shortages compared to London and the South-East of England.

DfT and CPT co-chaired a summit in November 2022 ([driver shortage summit](#)) to identify actions that could be taken to help alleviate the bus and coach driver shortage. Many of these actions are owned and driven by industry, who are responsible for recruiting and retaining drivers.

The main asks of the department were to take forward a consultation to:

- remove the 50km restriction on 18 to 20 year old bus and coach drivers when driving a regular service
- allow a person to undertake the theory tests and off-road manoeuvres tests required to gain their driver certificate of professional competence (DCPC) before being granted a provisional bus, coach, or heavy goods vehicle (HGV) driver entitlement

To address this shortage, DfT is calling for views on the impacts of amending licensing restrictions on bus, coach and HGV drivers, and removing the 50km regular service restriction on 18 to 20 year old bus and coach drivers. Interested parties – including bus, coach and road haulage operators, training providers and trade bodies – are invited to share their views on the proposals so we can understand if they will help with bus, coach and HGV driver shortages.

HGV driver shortages

In addition to bus and coach driver shortages, the road freight sector has also been impacted by a lack of drivers. The industry reported an acute shortage of HGV drivers that began in 2021.

The Government has implemented [33 short, medium and long-term interventions to help HGV driver shortages](#). These measures are taking effect with industry bodies reporting that the number of HGV drivers is stabilising. The measures include specific training initiatives, for example related to apprenticeships and bootcamps.

The second proposed action – allowing a person to undertake the theory and off-road driving tests without first being granted a provisional bus, coach, or HGV licence – would apply to HGVs and could further help improve HGV driver recruitment.

To further address this shortage, DfT is calling for views on the impacts of amending licencing restrictions on the HGV sector. Delegated testing and in-house training are more developed features of the bus and coach sector than the HGV sector.

Removal of the 50km restriction for 18 to 20 year old bus and coach drivers on a regular service

Currently, regulations allow drivers aged 18 to 20 to drive a bus or coach on a regular service in the UK, only when the route does not exceed 50km. The definition of regular and occasional services is defined in EU Regulation 1073/2009.

‘Regular services’ are defined as services which provide for the carriage of passengers at specified intervals along specified routes, passengers being picked up and set down at predetermined stopping points.

‘Special regular services’ means regular services, by whomsoever organised, which provide for the carriage of specified categories of passengers to the exclusion of other passengers.

‘Occasional services’ are defined as services which do not fall within the definition of regular services, including special regular services, and the main characteristic of which is the carriage of groups of passengers constituted on the initiative of the customer or the carrier himself.

The department is proposing to amend this legislation to allow people in this age group to drive a bus or coach on routes over 50km on regular (and special regular) services.

Respondents should note that the age and distance restriction does not apply to D1 licences – that is, Category D1, minibuses with no more than 16 passenger seats, a maximum length of 8 metres, a trailer up to 750kg.

Potential benefits of removing this restriction

Most local bus routes do not typically exceed 50km. This means the restriction on drivers aged 18 to 20 would have a smaller impact on bus operators.

As coach routes can frequently exceed 50km, it makes it harder for coach operators to employ drivers aged 18 to 20.

This restriction could mean people in this age group are lost to the sector even if they have an interest in becoming a bus or coach driver. When they hear of this restriction, they might prefer to take on other jobs as they may be unwilling to wait until they’re 21 to start a new career as a bus or coach driver.

The bus and coach sectors have indicated that removing this restriction could contribute to addressing the issue of the overall workforce shortage. It could also:

- increase the frequency of bus and coach services
- re-service or increase frequency of bus routes that were de-registered or amended due to insufficient numbers of drivers
- see the provision of new coach and bus services where there is demand

Some other benefits of removing this restriction could include:

- an increase in workforce diversity, as there could be a greater candidate pool
- providing more opportunities for younger drivers to be recruited
- moving to a similar position for 18 to 20 year old drivers of bus and coaches as exists already for HGVs
- supporting DfT's net zero aim by having more environmentally friendly public transport services available

Lowering the average age of bus drivers – which is currently 52 years old and has increased over the last 10 years, according to [DfT's annual bus statistics](#) – could be a longer-term benefit with resource planning.

Potential impacts of removing this restriction

Through this consultation, DfT will gather evidence on the:

- likely take up and implementation of the removal of the restriction for bus and coach drivers aged 18 to 20
- impact of bus and coach service provision for operators

This consultation will seek to ascertain views on the potential effects/impacts on road safety. However, the standard requirement to pass the DCPC will remain the same, regardless of the age of the driver.

Respondents should also be aware that the European Agreement Concerning the Work of Crews of Vehicles Engaged in International Road Transport (AETR) on drivers' hours rules would remain applicable to routes exceeding 50km for the carriage of over 9 passengers.

Road safety

In Great Britain, young drivers aged 17 to 24 account for 6% of driving licence holders but were involved in 28% of fatal and serious collisions in 2022.

There are several factors that may help explain the increased risk of collision with young people. Young men, in particular, are most at risk.

Things like overconfidence; underestimation of the difficulties of a task and overestimation of their capabilities; driver inexperience and behaviour regulation (especially as the pre-frontal cortex doesn't finish developing until around 25); optimism bias; and that younger drivers are most likely to take risks when this behaviour is normalised, or they are under peer pressure, could explain why younger drivers are most at risk.

However, the number of car fatalities involving 17 to 24 year olds on Britain's roads is falling. We have seen a drop in the number of 17 to 24 year olds killed from 448 in 1990, to 158 in 2010 and to 101 in 2022, a 77% decrease since 1990.

It is also unclear whether there is a direct link between the accident rate for younger drivers in general, compared to those younger drivers acting in a professional capacity. DfT publishes

statistics on accident rates for bus, coach and HGV drivers, broken down by age bands, but these are subject to several caveats, which are set out in the impact assessment.

On average around 0.5% of the fatal or serious collisions involving a bus or coach were cases where a driver was aged 17 to 20 years old. This is based on a subset of the latest published (2021) statistics¹ on injury collisions reported by police. Data from the ONS 3-year Annual Population Survey, covering 2020-2022², suggests that 17 to 20 year olds are likely to represent less than 1% of all bus/coach drivers (although this is based on a small sample size and should be treated with caution).

While the small sample sizes involved mean that it is not possible to establish with confidence whether drivers aged under 21 are responsible for a disproportionate number of collisions, the proportion of drivers that are in this age group appears to be broadly similar to the proportion of collisions involving this age group. However, this could also reflect the fact that bus or coach drivers of that age are limited to routes of less than 50km, rather than this demographic being more or less likely to be involved in road traffic accidents.

The road safety impacts of this proposal could be challenged due to the fact that risk is measured purely by age and does not take experience or training into account. It also does not take into consideration the following impacts on the road safety risk:

- **Vehicle type** – the type of vehicle being driven impacts a driver's behaviour i.e. buses and coaches do not have the same performance potential as a car, but do have increased weight, leading to different vehicle handling. This can surprise inexperienced drivers but is mitigated to a certain extent by the training that drivers receive before they qualify.
- **Training** – to be granted a full bus, coach or HGV licence, a person must complete training beyond that for a standard car driving licence, and this arguably offsets some of the road safety risk of younger drivers. Prospective drivers must undertake a further five additional vehicle specific theory and practical tests and 35 hours of ongoing training on a five yearly basis to retain their DCPC entitlement. We expect this additional training will make them safer drivers.
- **Driving in a professional capacity** – the fact that a person's livelihood depends on them being able to drive a bus or coach, and that operators may have systems in place which monitor how well a person is driving e.g., whether they are accelerating and braking harshly or doing other things that might be considered dangerous, is likely to reduce risky behaviours.

It is worth noting that about 20% of new drivers report at least 1 collision in their first 6 months of driving, but bus and coach drivers undergo more rigorous training than car drivers.

The department does not have information on road safety risks posed based on the length of time a person has held a licence, or their age and the length of time they have held a licence.

1 Adjusted based on STATS19 data.

2 Based on bespoke analysis of ONS Annual Population Survey 3 year dataset, 2020-2022: [Employment and labour market – Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/employment-and-labour-market)

We are calling for views on the proposal of removing this age restriction, with a specific interest in:

- the impact on driver recruitment
- road safety
- insurance premiums, and potential increases in costs

See the full consultation questions section to submit your views on the consultation.

Removing the requirement to hold a provisional bus, coach or HGV licence to undertake the theory and off-road modules of the DCPC test

Under the Road Traffic Act and Motor Vehicles (Driving Licence) Regulations, people must hold a licence – in the relevant category – before driving a vehicle on a public road in the UK.

Currently, drivers who wish to have a bus, coach or HGV licence must:

- hold a full car licence, and
- obtain a provisional entitlement in the relevant category by completing an application and supplying a medical report completed by a General Medical Council registered doctor, in order to sit the Driver Certificate of Professional Competence (DCPC) test

Driver certificate of professional competence tests

In addition to be able to drive a bus (including minibus), coach or heavy goods vehicles professionally (with some very limited exceptions), a driver must have obtained a DCPC. The usual way of acquiring a DCPC for an initial 5 years is in conjunction with the process of obtaining a driving licence for a HGV, bus or coach.

The DCPC test consists of 4 modules:

- theory test
- case studies
- two driving tests – including off-road manoeuvres exercise and on-road driving
- practical demonstrations

After passing the DCPC test, applicants will then receive a driver qualification card (DQC, denoting they have a valid DCPC) and a full vocational licence to drive either a bus, coach, or HGV. The department consulted earlier in 2023 about proposals to reform the DCPC, mainly affecting the periodic renewal which is needed every 5 years for holders of DQCs.

Before being able to undertake any of the modules, a person (whether they are seeking a vocational (for example, bus, coach or HGV) licence plus a DQC or just a vocational licence) must first apply to the Driver and Vehicle Licensing Agency (DVLA) for the appropriate provisional entitlement to be added to their licence.

The DVLA aim to process straightforward vocational licence applications within 5 working days. Where medical or conduct investigations are required the process may take longer.

Medical investigations

Drivers of bus, coaches and HGVs are required to meet higher medical standards which reflect the greater road safety risks posed by the driving of larger vehicles.

To do this, drivers must submit a medical report with their driving licence application for DVLA to assess their fitness to drive.

Where a relevant medical condition is declared, further investigation may be required. The length of time taken to deal with an application depends on the medical condition and if further information is required from medical professionals.

Most licensing decisions are made by the DVLA without the need for an examination. However, in some circumstances, eyesight tests, medical examinations, or additional driving assessments are required as part of an investigation into whether a driver can meet the necessary medical standards for driving.

For more information, see [Check if a health condition affects your driving: Overview – GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/topics/health-conditions-affecting-driving)

Investigating driver conduct

All vocational drivers must provide details of findings of guilt, fixed penalties and cautions relating to all driving offences including drivers' hours or records, roadworthiness or loading vehicles. Where a driver is applying for a bus entitlement, they should also declare any findings of guilt, fixed penalties and cautions for non-driving related offences. This is to ensure that applicants are fit to hold a licence in regard to conduct.

If there are issues around driving conduct, applications will be referred to the Traffic Commissioner (TC) for an assessment. The TC will determine if the driver can hold a:

- large goods vehicle (LGV) licence – goods vehicles 7.5 tonnes or more
- passenger carrying vehicle (PCV) licence

Proposal for consultation

The bus and coach sectors believe around 1,600 people leave the industry annually before a decision has been made on their provisional entitlement, which is within 5 days in most cases.

We have heard from the industry that if training was able to start immediately after applying for a licence, this could prevent drivers from seeking alternative employment opportunities.

Despite DVLA reducing turnaround times for vocational licences from 10 to 5 working days, we are proposing 2 further options:

Option 1 – removing the requirement to hold a provisional bus, coach or HGV licence before undertaking the theory, case study and practical demonstration modules of the DCPC test. People do not drive any vehicles during these tests.

Option 2 – removing the same requirement given in Option 1, but also includes the off-road manoeuvres test of the DCPC.

In both options, a provisional entitlement would be required before completing any on-road driving, which includes the on-road test. We are not proposing removing the entitlement for on-road driving.

We are seeking views from interested parties – including road haulage operators, training providers and trade bodies – about this proposal and if it could help with driver shortages.

Potential benefits and impacts: Removing the requirement to hold a provisional bus, coach or HGV licence to undertake the theory and off-road modules of the DCPC test

DVLA aims to process all standard vocational licence applications in 5 working days. As mentioned above, more complex cases due to medical or driver conduct investigations, may take longer.

We therefore believe implementing either Option 1 or Option 2 will have a small impact on addressing driver shortages as the average processing time for vocational licenses is 5 days in many cases.

If either option is implemented, it remains true that a proportion of the 1,600 people currently leaving the industry before a decision has been made on their provisional entitlement will not be eligible to complete their driver training due to health and conduct issues which would currently be identified before their provisional licence is granted.

However, industry have suggested to DfT that there are likely to be a material number of applicants who would have been granted a provisional entitlement and therefore **remained** in training, had it not taken the additional time necessary to process these checks. These measures could therefore help ensure this cohort remains in training.

DfT understands there is limited data to draw a sufficient conclusion on the impact of both options in addressing the shortage or achieving potential wider benefits to the bus and coach sector.

However, there may be some challenges if the requirement of holding a provisional licence before undertaking off-road and theory tests is removed. These challenges are given below.

Staff resource costs for testing and training

Some people undertaking training and testing would eventually be refused a provisional bus, coach or HGV entitlement due to existing health conditions or a driver conduct matter, and this could have an impact on bus operators.

Operators pay for and provide training for their employees to sit these tests, and so any tests or training undertaken by individuals who are eventually refused a provisional entitlement would ultimately impact operators' resources. Evidence from the industry indicates this cost is one the sector is willing to absorb, but we would like views from the wider industry on this potential impact.

Individuals that provide self-funded training

Individuals who self-fund their driver training and testing, (in particular HGV and coach drivers) may experience sunk costs if they fund training and testing ahead of finding out they haven't been granted the appropriate provisional entitlement.

Impact on DVSA resourcing

If this proposal is implemented, there could be an increase in demand for more theory and off-road testing slots. If bus, coach and HGV operators and training schools do not have their own delegated authority to conduct these tests on behalf of DVSA, this may impact DVSA's ability to meet its obligations to wider schemes – for example, on-road tests for HGV bootcamp candidates.

83% of the off-road manoeuvre tests are assessed by delegated examiners or testers that are authorised by DVSA. The remaining tests are assessed by DVSA. The vast majority of bus and coach theory tests are conducted by operators with delegated authority; however, this is not the case for HGVs where operators and training schools are heavily reliant on DVSA services.

Health and safety standards

Bus, coach, and vocational HGV drivers must meet higher health standards than car drivers as they operate some of the largest and heaviest vehicles on UK roads and for longer periods during the course of their occupation. These proposals do not include any element of on-road driving, but there is a potential risk to health and safety by allowing drivers that are medically unassessed to complete the off-road manoeuvres test and the [uncoupling and recoupling procedure](#) if the test is being taken with a trailer.

Increase in insurance costs

There may be an increase in insurance costs for those running or assessing bus, coach and HGV training and testing. Some candidates would not have been allowed to drive a vehicle, on or off road, due to health considerations or prior conduct issues.

Increase in costs for DVSA services

The cost to implement both options will require further consideration by DVSA, as it could require changes in the theory test booking system to remove the licence entitlement check. Candidates will also need to follow correct processes and only book tests they are entitled to when the check is removed.

It is possible that the cost of implementing either of these options could outweigh any benefits.

Option 1 impact

We do not expect this measure to have a significant impact on road safety, or health and safety. This is because none of the tests involve a candidate driving a vehicle.

Option 2 impact

We do not expect this measure to have a significant impact on road safety, as this too does not require a candidate to drive a vehicle on public highways.

However, there could be an increased health and safety risk to the person undertaking the test and to people where the off-road test is being held. This is because a person with an unassessed health condition, who would have been prevented from being able to complete any training in the first place, under current rules, may be unfit to drive large vehicles while undertaking the off-road element of the test.

As the test is conducted while the driver is unaccompanied and in a publicly accessible area, the test may be taken by a person who may not be medically fit to operate large vehicles. This remains true for HGV tests which involve coupling and uncoupling exercises.

This could put examiners, the public, and natural and man-made objects at risk.

See the full consultation questions section below to submit your views on the consultation.

Annex A: Consultation Questions

1. Provide your name and address / email address.

2. Are you providing an individual response?
 - Yes, I'm responding as an individual (go to question 3)
 - No, I'm responding on behalf of an organisation (go to question 6)

Individual details (skip if you are an organisation)

3. If you answered yes to question 2 how old are you?
 - Less than 18 years old
 - 18 to 20 years old
 - 21 to 24 years old
 - 25 to 34 years old
 - 35 to 44 years old
 - 45 to 54 years old
 - 55 years old or above

For the following question we are asking whether you have any experience of working for any organisations which are affected by the proposals we are suggesting.

For this question we would consider the statement of “ever” to be if you have either previously worked or currently work in the stated area.

4. Have you ever worked within:
 - the bus sector?
 - the coach sector?
 - the HGV sector?
 - the insurance sector?
 - an industry body?
 - an organisation with a focus on road safety?
 - another organisation which has an interest in the matters being considered as part of the consultation?

5. Have you ever worked as a driver in the affected sectors?

- Yes, in the HGV sector?
- Yes, in the Bus sector?
- Yes, in the Coach sector?
- No

Organisation details (skip if you are an individual)

6. Please provide the name of the organisation.

7. Which best describes the organisation or company?

- Bus operator
- Coach operator
- Bus and coach operator
- Heavy goods vehicle (HGV) operator
- Trade union
- Insurance provider
- An organisation with a focus on road safety
- Local government
- Central government
- Another organisation which has an interest in the matters being considered as part of this consultation

Please provide the name

8. How many members or employees does the organisation or company have?

9. How many vacancies does your organisation currently have for new drivers?

	0 positions	1 to 5 positions	6 to 10 positions	11 to 20 positions	21 to 30 positions	31 to 40 positions	41 to 50 positions
bus drivers							
coach drivers							
HGV drivers							

If above '50 positions' please state how many positions:

10. How many of those new driver vacancies are open to people aged 18 to 20?

Proposal to remove the 50km restriction for 18 to 20 year old bus and coach drivers

11. Would you be, or would you have been, more likely to apply to become a:

	Yes	No	Don't know
bus driver if the 50km regular service restriction was removed?			
coach driver if the 50km regular service restriction was removed?			

Why do you think that?

12. Do you agree or disagree with removing the 50km regular service restriction on 18 to 20 year old bus and coach drivers?

- Agree for both bus and coach drivers
- Agree for bus drivers only
- Agree for coach drivers only
- Disagree
- Don't know

13. If you selected **AGREE** to question 12 why do you agree with this proposed removal?
Tick all that apply.

- I believe 18 to 20 year old bus drivers should be able to undertake the same work as an over 21 year old bus driver
- I believe 18 to 20 year old coach drivers should be able to undertake the same work as an over 21 year old coach driver
- I believe that it would allow the bus industry to recruit more people in this age group
- I believe that it would allow the coach industry to recruit more people in this age group
- I believe that it would allow the bus industry to increase the number of positions available
- I believe that it would allow the coach industry to increase the number of positions available
- As a similar restriction is not in place for HGV drivers of the same age I believe both groups of drivers should be treated equally
- Another reason:

14. If you selected **DISAGREE** to question 12, why do you disagree with this proposed removal? Select all that apply.

- I believe the removal of this restriction may have a negative impact on road safety
- I believe it may increase insurance premiums paid by bus operators
- I believe it may increase insurance premiums paid by coach operators
- I believe it may increase insurance premiums paid by bus drivers
- I believe it may increase insurance premiums paid by coach drivers
- It may increase insurance premiums for all drivers
- I do not believe more 18 to 20 year olds will apply to become a bus or coach driver
- I disagree with this proposal for another reason:

Impact on the potential number of job applications

15. In your view would the proposed removal of the 50km regular service restriction increase or decrease the number of bus and coach driver applicants aged 18 to 20 years old?

- Yes, it will increase the number of applicants to be a bus and coach driver
- Yes, it will increase the number of applicants to be a bus driver but the number of applicants to be a coach driver will remain the same
- Yes, it will increase the number of applicants to be a coach driver but the number of applicants to be a bus driver will remain the same
- Yes, it will increase the number of applicants to be a bus driver but the number of applicants to be a coach driver will decrease
- Yes, it will increase the number of applicants to be a coach driver but the number of applicants to be a bus driver will decrease
- No, the number of applicants to be either a bus and coach driver will remain the same
- No, the number of applicants to be a coach driver will decrease and the number of applicants to be a bus driver will remain the same
- No, the number of applicants to be a bus driver will decrease and the number of applicants to be a coach driver will remain the same
- No, the number of applicants to be a bus and coach driver will both decrease
- Don't know

Please explain your reasoning:

16. How many more or fewer people aged 18 – 20 do you think will apply to be a:

	6 to 10 more people per vacancy	1 to 5 more people per vacancy	No change	1 to 5 less people per vacancy	6 to 10 less people per vacancy	A different amount
bus driver, per vacancy?						
coach driver, per vacancy?						

If 'a different amount' state the amount:

Impact on driver employment

17. In your view would bus and coach operators recruit more or fewer drivers aged 18 to 20 years old as a result of the removal of the 50km regular service restriction?

- Yes, both bus and coach operators would recruit more 18 to 20 year old drivers
- Yes, bus operators would recruit more 18 to 20 year old drivers but the number of 18 to 20 year old coach drivers recruited would remain the same
- Yes, coach operators would recruit more 18 to 20 year old drivers but the number of 18 to 20 year old bus drivers recruited would remain the same
- No, bus operators would recruit fewer 18 to 20 year old drivers but the number of 18 to 20 year old coach drivers recruited would remain the same
- No, coach operators would recruit fewer 18 to 20 year old drivers but the number of 18 to 20 year old bus drivers recruited would remain the same
- No, both bus and coach operators would not recruit any more 18 to 20 year old bus and coach drivers
- No, both bus and coach operators would recruit fewer drivers
- Don't know

Please explain your reasoning:

Impact on service provision

18. Do you believe that removing the 50km regular service restriction on 18 to 20 year old bus and coach drivers could result in service provision increasing?

- Yes, bus only
- Yes, coach only
- Yes, bus and coach
- No
- Don't know

Please explain your reasoning:

Road Safety

19. Do you believe removing the 50km regular service restriction for:

	Yes	No	Don't know
bus drivers could have a negative impact for overall road safety?			
coach drivers could have a negative impact for overall road safety?			

Explain why you think that, including any evidence:

Risk of accident

20. Do you believe bus and coach drivers aged 18 to 20 would have an increased or decreased risk of being involved in a road traffic accident due to driving a route above the 50km regular service restriction?

- There is an increased risk for bus and coach drivers
- There is an increased risk for bus drivers only
- There is an increased risk for coach drivers only
- There is no change of risk for either of these drivers
- There is a decreased risk for bus drivers only
- There is a decreased risk for coach drivers only
- There is a decreased risk for bus and coach drivers
- Don't know

Please explain your reasoning:

Removal of the 50km restriction

21. If the proposal to remove the 50km regular service restriction on bus and coach drivers aged 18 to 20 was removed what, if any, measures do you think should be put in place to mitigate the increased risk to road safety?

Bus drivers:

Coach drivers:

22. If the proposal to remove the 50km regular service restriction on 18 to 20 year old bus and coach drivers was implemented, do you believe this would have a negative impact on insurance premiums for:

	Yes	No	Don't know
bus operators?			
coach operators?			
all drivers?			

Please explain your reasoning:

Age and accidents

23. Do you believe that a bus or coach driver, aged 18 to 20 years old, has the same level of risk of being involved in an accident compared to the same age group driving another vehicle (for example a car or motorbike)?

	Yes	No	Don't know
bus driver			
coach driver			

Please explain your reasoning:

24. Do you believe that removing the 50km restriction on a bus or coach driver, aged 18 to 20 years old, will alter the likelihood of a person of that age being involved in an accident?

	Yes	No	Don't know
bus driver			
coach driver			

Please explain your reasoning:

25. Do you believe that removing the 50km regular service restriction on a bus or coach driver, aged 18 to 20 years old, will alter the likelihood of a person of that age being involved in an accident compared to the same age group driving another vehicle (for example a car or motorbike)?

	Yes	No	Don't know
bus driver			
coach driver			

Please explain your reasoning:

26. Do you believe that a bus or coach driver, aged 18 to 20 years old, with the same amount of driving experience as a driver aged 21 and above, has the same level of risk of being involved in an accident?

	Yes	No	Don't know
bus driver			
coach driver			

Please explain your reasoning:

Alternative proposal

27. Would you prefer an alternative proposal to our suggested approach of removing the 50km regular service restriction for bus and coach drivers aged 18 to 20 years to be implemented?

- Yes, for both buses and coaches
- Yes, for buses only
- Yes, for coaches only
- No
- Don't know

28. If you selected Yes to question 27, would you prefer:

- A different restriction on the maximum distance an 18 to 20 year old driver can drive?
- The maximum distance a driver aged between 18 and 20 years old is able to drive is increased as their experience develops?
- Drivers aged 18 to 20 should be accompanied by an experienced driver for a fixed period of time?
- Another restriction should be put in place?

Please explain how this alternative proposal would work. For example, if you felt a different restriction on the maximum distance a driver could drive should be put in place what would be the distance?

Other comments

29. What, if any, other comments do you have concerning the proposal to remove the 50km regular service restriction on 18 to 20 year old bus and coach drivers?

Removing the requirement to hold a provisional bus, coach or HGV licence to undertake the theory and off-road modules of the DCPC test

In this section, we will be asking for your views on:

Option 1 – removing the requirement to hold a provisional bus, coach or HGV licence before undertaking the theory, case study and practical demonstration modules of the Driver Certificate of Professional Competence (DCPC) test. This would mean a person is able to undertake all three elements of the DCPC test without a provisional licence where the vehicle does not move.

Option 2 – As option 1 but with the addition of allowing a person to undertake the off-road manoeuvre module of the DCPC test.

In both of these options, we are asking if drivers should be able to undertake theory tests before being granted a provisional bus, coach or HGV entitlement.

People are not currently allowed to drive any of these vehicles before receiving a provisional bus, coach or HGV entitlement.

30. Would you be, or would you have been, more likely to apply to become a:

	Yes	No	Don't know
bus driver if this restriction was removed?			
coach driver if this restriction was removed?			
HGV driver if this restriction was removed?			

Why do you think that?

31. In your view, should a person be able to undertake the theory, case study and practical demonstration modules of the DCPC test (Option 1) before receiving a provisional:

	Yes	No	Don't know
bus entitlement?			
coach entitlement?			
HGV entitlement?			

Explain why you think this (giving any examples and evidence if you can)?

32. In your view, should a person be able to undertake the theory, case study, practical demonstration and off-road manoeuvres modules of the DCPC test (Option 2) before receiving a provisional:

	Yes	No	Don't know
bus entitlement?			
coach entitlement?			
HGV entitlement?			

Explain why you think this (giving any examples and evidence if you can)?

33. In your view, if a driver has an existing health condition, should a decision by the Driver and Vehicle Licensing Agency be reached as to whether that health condition will prevent the person from holding a vocational driving licence before allowing that person to undertake any of the modules set out in Option 1 for:

	Yes, the decision should be reached before a person can undertake any of the modules	No, the decision can be made after the person undertakes some or all of the modules	Don't know
bus driving?			
coach driving?			
HGV driving?			

Explain why you think this (giving any examples and evidence if you can)?

34. In your view, if a driver has an existing health condition, should a decision by the Driver and Vehicle Licensing Agency be reached as to whether that health condition will prevent the person from holding a vocational driving licence before allowing that person to undertake any of the modules set out in Option 2 for:

	Yes, the decision should be reached before a person can undertake any of the modules	No, the decision can be made after the person undertakes some or all of the modules	Don't know
bus driving?			
coach driving?			
HGV driving?			

Explain why you think this (giving any examples and evidence if you can)?

35. In your view, should a decision be reached in respect to whether a person's past conduct should prevent them from holding a vocational licence before a person can undertake any of the modules set out in Option 1 for:

	Yes, a decision should be reached before a person can undertake any of the modules	No, matters relating to a driver's conduct can be investigated while a person undertakes some or all of the modules	Don't know
bus driving?			
coach driving?			
HGV driving?			

Explain why you think this (giving any examples and evidence if you can)?

36. In your view, should a decision be reached in respect to whether a person's past conduct should prevent them from holding a vocational licence before a person can undertake any of the modules set out in Option 2 for:

	Yes, a decision should be reached before a person can undertake any of the modules	No, matters relating to a driver's conduct can be investigated while a person undertakes some or all of the modules	Don't know
bus driving?			
coach driving?			
HGV driving?			

Explain why you think this (giving any examples and evidence if you can)?

Health and Safety

37. If either option was implemented would you have any health and safety concerns?

	Yes	No	Don't know
Option 1			
Option 2			

If yes, please explain your reasoning, and for each option if different.

38. If you answered Yes to question 37, what measures, if any, could be put in place to address your health and safety concerns?

Benefits

39. If either Option 1 or Option 2 was implemented do you believe there would be benefits for the bus, coach and HGV sectors?

	Option 1
	Yes, for all 3 sectors
	Yes, for buses and coaches only
	Yes, for buses and HGVs only
	Yes, for coaches and HGVs only
	Yes, for buses only
	Yes, for coaches only
	Yes, for HGVs only
	No
	Don't know

	Option 2
	Yes, for all 3 sectors
	Yes, for buses and coaches only
	Yes, for buses and HGVs only
	Yes, for coaches and HGVs only
	Yes, for buses only
	Yes, for coaches only
	Yes, for HGVs only
	No
	Don't know

40. Which, if any, of the following benefits do you think could be achieved by implementing Option 1?

	Drivers could begin their career straight away	The length of time it takes to train new drivers could be shortened	Other benefits
For buses			
For coaches			
For HGVs			

If 'other benefits', please describe:

41. Which, if any, of the following benefits do you think could be achieved by implementing Option 2?

	Drivers could begin their career straight away	The length of time it takes to train new drivers could be shortened	Other benefits
For buses			
For coaches			
For HGVs			

If 'other benefits', please describe:

42. In your view, would allowing people to undertake the theory, case study and practical demonstration modules of the DCPC test before receiving a provisional licence (Option 1) potentially help address the driver shortage for:

	Yes	No	Don't know
bus operators?			
coach operators?			
HGV operators?			

Please explain your reasoning:

43. In your view, would allowing people to undertake the theory, case study and practical demonstration and off-road manoeuvres modules of the DCPC test before receiving a provisional licence (Option 2) potentially help address the driver shortage for:

	Yes	No	Don't know
bus operators?			
coach operators?			
HGV operators?			

Please explain your reasoning:

44. What, if any, other comments do you have on Option 1 or 2?

Your preferred option

45. Which option would you support implementing for:

	Option 1	Option 2	Neither option and maintain current position	Another option
Buses?				
Coaches?				
HGVs?				

Please explain your reasoning and elaborate if you have chosen 'another option'.

46. Which option in your view could help:

	Option 1	Option 2	Maintaining the existing status	Another option
Bus operators the most?				
Coach operators the most?				
HGV operators the most?				

Please explain your reasoning and elaborate if you have chosen 'another option'.

47. Which option in your view has the most health and safety risks?

	Option 1
	Option 2
	Both options have equally increased health and safety risks
	Neither option has increased health and safety risks
	Don't know

Please explain your reasoning:

48. Which option in your view would have the greatest negative impact on insurance premiums?

	Option 1
	Option 2
	Both options have an equally negative effect on insurance premiums
	Neither option has a negative effect of insurance premiums
	Don't know

Please explain your reasoning:

49. Outline any other comments you have on your preferred option:

Impact assessment

We are seeking views on the consultation impact assessment which outlines the costs and benefits that may arise from the proposals. We understand however, these are based on limited evidence and evidence gaps exist.

50. Do you agree or disagree that the:

	Agree	Disagree	There will be no impact	Don't know
50km proposal will increase operating costs for the bus sector?				
50km proposal will increase operating costs for the coach sector?				
50km proposal will increase operating costs for the HGV sector?				
test requirements proposal will increase operating costs for the bus sector?				
test requirements proposal will increase operating costs for the coach sector?				
test requirements proposal will increase operating costs for the HGV sector?				

Please explain your reasoning:

51. What impact would you expect that the:

	Increase in wages	No impact on wages	Decrease in wages	Don't know
50km proposal for bus drivers would have on driver wages in the short term?				
50km proposal for coach drivers would have on driver wages in the short term?				
50km proposal for HGV drivers would have on driver wages in the short term?				
test requirements proposal for bus drivers would have on driver wages in the short term?				
test requirements proposal for coach drivers would have on driver wages in the short term?				
test requirements proposal for HGV drivers would have on driver wages in the short term?				

Please explain your reasoning:

52. What impact would you expect that the:

	Increase in wages	No impact on wages	Decrease in wages	Don't know
50km proposal for bus drivers would have on driver wages in the long term?				
50km proposal for coach drivers would have on driver wages in the long term?				
50km proposal for HGV drivers would have on driver wages in the long term?				
test requirements proposal for bus drivers would have on driver wages in the long term?				
test requirements proposal for coach drivers would have on driver wages in the long term?				
test requirements proposal for HGV drivers would have on driver wages in the long term?				

Please explain your reasoning:

53. Do you agree or disagree with the statement that the:

	Agree	Disagree	There will be no impact	Don't know
50km proposal will decrease bus fares?				
50km proposal will decrease coach fares?				
test requirements proposal will decrease bus fares?				
test requirements proposal will decrease coach fares?				

Please explain your reasoning:

54. Do you agree or disagree with the service provision statement that the:

	Agree	Disagree	There will be no impact	Don't know
50km proposal will increase bus service provision?				
50km proposal will increase coach service provision?				
test requirements proposal will increase bus service provision?				
test requirements proposal will increase coach service provision?				

Please explain your reasoning:

55. Overall, do you think that the impacts of these proposals would encourage or discourage people to switch from cars to:

	Encourage a lot	Encourage a little	No effect	Discourage a little	Discourage a lot	Don't know
Buses						
Coaches						

Please explain your reasoning:

For HGV, Bus and Coach Operators only

56. Compared to now, can you provide an estimate of how many additional staff members in your organisation will need to familiarise themselves with the proposed changes on the removal of the 50km restriction on 18-20 year olds, and the removal of the requirement to hold a DCPC before undertaking theory, case study, practical demonstration (option 1) and off road manoeuvres (option 2)?

57. What evidence, if any, do you have that shows how much time it will take for administrative staff to familiarise themselves with the updated guidance on the removal of the 50km regular service restriction on people aged 18 to 20 years?

58. What evidence, if any, do you have that demonstrates how much time it will take for administrative staff to familiarise themselves with the updated test requirements, (the removal of the requirement to hold a provisional licence before undertaking the modules, option 1 or option 2)?

Any other comments

59. Outline any other comments you may have.

Annex B: What will happen next

A summary of responses, including the next steps, will be published within three months of the consultation closing on [gov.uk](https://www.gov.uk). Paper copies will be available on request.

If you have questions about this consultation please contact:

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33 Horseferry Road, London, SW1P 4DR

Phone number: 0300 330 3000

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Annex C: Consultation principles

The consultation is being conducted in line with the Government's key consultation principles which are listed below. Further information is available at <https://www.gov.uk/government/publications/consultation-principles-guidance>

If you have any comments about the consultation process please contact:

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