

# **Dangerous Goods**

Safety Adviser

**Call for Evidence Report 2025** 

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#### **Executive summary**

The Dangerous Goods Safety Adviser (DGSA) plays a critical role in the transportation of dangerous goods, by helping to mitigate risks to people, property and the environment.

The <u>Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (CDG)</u>, and the <u>Health and Safety at Work Act 1974.</u> require organisations that handle, process or transport dangerous goods on a regular basis, unless in limited quantities to employ a DGSA.

DGSAs advise companies on the safe and correct transportation of dangerous goods, the packing and shipping processes, as well as correct marking and labelling. They monitor compliance, investigate and report incidents.

It is essential that DGSAs feel supported by both their organisation and the wider industry, to enable them to carry out their duties with confidence. There are many guidance notes already available on gov.uk. The Department for Transport is keen to identify any gaps in the support currently provided to DGSAs and to explore how best to strengthen this support.

This call for evidence was run by the Department from 3 October 2024 until 17 January 2025 and was aimed at DGSAs, employers of DGSAs, and anyone working for an organisation transporting dangerous goods which is exempt from employing a DGSA.

292 respondents took part in the survey including 268 DGSAs, representing around 12% of the total cohort of DGSAs in the UK. Despite the limited sample size, responses were received from all four nations.

Whilst views varied, there is a strong consensus around the need to raise the profile of DGSAs across the industry. The Department will look into possible steps to strengthen enforcement against non-compliance, to ensure organisations comply with their legal obligations to appoint a DGSA and follow their advice.

There were also some calls for changes to qualification and training processes, such as introducing a separate Class 7 exam. This reflects views already echoed by professionals in the nuclear and radiological industries.

However, those who have undertaken training overwhelmingly consider training and training providers to be high quality and feel supported by their organisations.

Having considered the responses to the Call for Evidence, the Department will:

- Work with the Training Advisory Panel (TAP) to provide more continuous professional development (CPD) options for DGSAs, and make sure that training equips DGSAs with the practical skills and knowledge required for the role itself, not solely to pass the exam.
- Many DGSAs have asked to be made aware of CPD offers as well as changes to DGSA exams, guidance notes, and updates to the national and international dangerous goods regulations. The Department and the Driver Vehicle and Standards Agency (DVSA) are developing a DGSA database of email addresses aimed at sharing information; however this will take time to create as DGSAs will be asked to opt-in when renewing their qualification.
- Although many DGSAs support a switch to computer-based exams, further research
  will be required on the implications of such a change, such as accessibility. The
  Dangerous Goods Driver exam is already a computer-based multiple-choice exam
  but does not use case studies, contrary to the DGSA exams.
- There have been longstanding complaints regarding the limited feedback that DGSAs receive on their exams. Since the survey took place, DVSA have increased the level of feedback that candidates receive. We will await feedback on these improvements before making further changes.
- We will develop an audit template to assist DGSAs in their annual audits, to be published on gov.uk.
- The Department will also work with the Office for Nuclear Regulation (ONR) on the possibility of introducing of a separate Class 7 DGSA exam for those handling Class 7 goods.
- We understand the role of enforcement and publicly available information on enforcement actions in tackling non-compliance and incentivising compliant practices. The Department will consider the role and resourcing of enforcement further.

We would like to thank everyone who took the time to complete the survey, and greatly appreciate the valuable feedback received.

The survey results will be used to inform our internal evidence base and future policy developments to the DGSA profession.

#### Methodology

The call for evidence consisted of 67 questions using a skip logic structure, where responses to initial questions on a topic dictated whether additional related questions were shown. 292 respondents took part in the survey.

- We used 'thematic analysis' to process the qualitative data. This is an analytical approach that focuses on identifying themes and patterns across a dataset in relation to a specific research question. Percentages are not presented for qualitative responses. As such, the tables showing themes or categories don't have percentages as derived from qualitative data.
- Some respondents aligned with multiple themes, and this was tallied up onto each theme accordingly.
- Whilst 292 people responded to the survey, some of the closed questions allowed respondents to select multiple categories and some respondents did not answer some of the questions or found them not applicable. Therefore, the number of respondents per question varied. Some percentages are rounded to two decimal points.

#### Findings from the consultation

Q1-2 sought personal information and, therefore, are not reported here.

#### Question 3 - Respondent type

Of the 292 respondents, the majority were DGSAs, previous DGSAs or those training to be a DGSA (93.83% of respondents in total).

Table 1: Number of survey respondents by category

Type of respondent	Number of respondents	Percentage
DGSAs	268	91.78%
Employers of DGSAs	11	3.77%
Previous DGSAs	5	1.71%
Training to be a DGSA	1	0.34%
Working in an organisation exempt from having a DGSA	1	0.34%
Another type of responder	6	2.06%

# Question 4 – State the reasons why your organisation is exempt from having a DGSA?

Only one organisation responded to this question, saying they were exempt because of the limited quantity of dangerous goods they transport; as a result, they sit outside the regulatory requirement to have a DGSA. When this organisation exceeds the limited quantity amount, they use external hauliers compliant with the dangerous goods regulations.

#### Question 5 – Your age category is?

The purpose was to provide an estimate of the profession's demographic profile.

Table 2: Age category

Answer choices	Response total	Response percent
26-40 years	45	16.79%
41-50 years	70	26.12%
51-60 years	109	40.67%
60+ years	40	14.93%
prefer not to say	4	1.49%

268 DGSAs answered this question, with 40.67% of respondents stating they were 51-60 years of age and 14.93% over 60. These figures show that 55% of the DGSAs who responded to the survey are over 50, which could indicate that over half of the UK cohort of DGSAs are approaching retirement age.

#### Question 6 – How long have you been a DGSA?

The purpose of this question was to determine the years of DGSA experience. 72% of the 268 DGSAs have been a DGSA for more than three years.

Table 3: Period of time as a DGSA

Answer choices	Response total	Response percent
0-12 months	33	12.31%
1-3 years	42	15.67%
3-10 years	59	22.01%
10-15 years	37	13.81%
15-20 years	39	14.55%
20-25 years	31	11.57%
25+ years	27	10.07%

# Question 7 – What is the average time in hours in your working week you spend advising on dangerous goods?

35.82% of the 268 DGSAs spend one to five hours weekly providing professional advice on dangerous goods.

Table 4: Weekly time advising

Answer choices	Response total	Response percent
Under 1 hour	39	14.55%
Between 1 and up to 5 hours	96	35.82%
Between 5 and up to 10 hours	43	16.04%
Between 10 and up to 15 hours	17	6.34%
Between 15 and up to 20 hours	18	6.72%
Between 20 and up to 30 hours	29	10.82%
Over 30 hours	26	9.70%

#### Question 8 - You are:

A majority – 170 (63.43%) out of the 268 DGSAs – are directly employed by one company.

Table 5: Employment type

Answer choices	Response total	Response percent
Directly employed by 1 company	170	63.43%
Directly employed by 2 or more companies	2	0.75%
Employed as an external contractor	81	30.22%
Directly employed and an external contractor	15	5.60%

#### The following questions were asked to those employed as an external contactor.

# Question 9 – How many requests for work do you receive monthly?

Of the 96 DGSAs employed as external contractors, the majority of 62 (64.58%) receive one to five work requests per month. Although seven (7.29%) reported receiving "above 20 requests" monthly, the time spent dealing with these requests varies greatly.

Table 6: Monthly work requests received

Answer choices	Response total	Response percent
0 request	14	14.58 %

1-5 requests	62	64.58 %
6-10 requests	8	8.33 %
11-15 requests	1	1.04 %
16-20 requests	4	4.17 %
Above 20 requests	7	7.29 %

Table 7: Monthly work requests above 20 (no percentages here as small numbers)

Theme/category	Number of responses
25 requests	1
30 requests	1
Varied	3
New clients only	1
No number / didn't understand questions	1

#### Question 10 – Have you ever had to turn down DGSA work?

### Question 11 – The reasons you turned down DGSA work were?

96 responded to these questions. A majority of 59 (61.46%) stated that they have never turned down work.

Table 8: Turning down work

Answer choices	Response total	Response percent
Yes	37	38.54 %
No	59	61.46%

From those that have turned down work (38.54%), the reasons given were: too busy; not being required after all; did not have the knowledge required to deal with that request; the company enquiring was unsuitable due to its reputation; company location (too far) or conflict of interest.

### Question 12 – How many organisations do you currently advise as a DGSA?

The majority of 52 (54.17%) respondents advise more than five companies. 46 of those provided further information on the number of organisations; the majority of these advise between 6-29 companies.

Table 9: The number of organisations DGSAs advise

Answer choices	Response total	Response percent
>5 companies	52	54.17%
2 companies	14	14.58%
5 companies	12	12.5%
1 company	9	9.38%
0 company	4	4.17%
4 companies	3	3.13%
3 companies	2	2.08%

Table 10: The number of organisations DGSAs advise over 5

Answer choices	Response total	Response percent
6-9 organisations	13	25.00%
10-19 organisations	14	26.92%
20-29 organisations	11	21.15%
30-49 organisations	4	7.69%
50+ organisations	4	7.69%
Not specified	6	11.54%

The following questions were based on monitoring compliance.

# Question 13 – In a quarterly period, on average how regularly do you monitor compliance with the carriage of dangerous goods regulations?

113 (42.16%) DGSAs stated that they monitor compliance between one to five times per quarter, with 83 (30.97%) monitoring six to ten times.

From the 58 (21.64%) respondents who monitor compliance more than ten times, 56 provided further information, with 17 respondents monitoring compliance daily.

Table 11: Quarterly number of compliance monitoring

Answer choices	Response total	Response percent
0 time	14	5.22%
1-5 times	113	42.16%
6-10 times	83	30.97%
More than 10 times	58	21.64%

Table 12: Monitoring compliance more than 10 times quarterly

Theme/category	Number of responses
10-20 quarterly	11
20+ quarterly	3
Daily	17
Weekly	7
Monthly	1
Annually	1
Biannually	1
Ongoing	10
Varies/Adhoc	5

### Question 14 – Which locations does your DGSA work currently include?

# Question 15 – Which regions of England does your DGSA work currently work?

Of the 268 DGSAs, the vast majority (89.932%) said they worked in England, although DGSAs can work in multiple locations.

On regions of England, 60.176% indicated working in the North-West, with at least 100 DGSAs in each region of England (Table 15).

We did not ask for a breakdown of regions within Scotland, Wales and Northern Ireland.

From the 32 (11.94%) DGSAs who indicated working in "another location", with multiple answers chosen, the majority work in Europe (EU and neighbouring countries).

Table 13: DGSA work in the UK (due to a multi-choice question, more than one option available % worked out from 268 DGSAs).

Answer choices	Response total	Response percent
England	241	89.93%
Scotland	106	39.55%
Wales	97	36.19%
Northern Ireland	38	14.18%
Another location	32	11.94%

Table 14: Another location of work

Theme/category	Number of
	responses

Work in Europe	20
Work in other countries	17

Table 15: Areas of England (due to a multiple-choice question, more than one option available % worked out from 241 DGSAs working across England)

Answer choices	Response total	Response percent
Greater London	101	41.91%
South-East	132	54.77%
South-West	104	43.15%
West Midlands	122	50.62%
North-West	145	60.17%
North-East	106	43.98%
Yorkshire and the Humber	116	48.13%
East Midlands	116	48.13%
East of England	106	43.98%

#### The following questions concerned management reporting.

#### Question 16 - You have:

The majority of respondents 191 (71.27%) have a direct line to report to management.

Table 16: You have:

Answer choices	Response total	Response percent
A management reporting line	191	71.27%
A mixture of some management reporting and no reporting lines	59	22.01%
No management reporting line	18	6.72%

# Question 17 – What challenges exist that prevent a management reporting line from being established?

17 respondents provided reasons as to why they had "**no management reporting line**" (with one of these DGSAs providing reasons for two themes):

- 14 respondents were identified under the theme of "management reporting not required" due to the following reasons:
  - Managing Director/Owner;
  - A Contractor;

- Self-employed;
- A trainer;
- The only DGSA, due to the company structure, or only providing updates.
- Four respondents provided other reasons:
  - The company or clients had a lack of knowledge;
  - They were not supportive;
  - They didn't give recognition;
  - They ignored advice.

# Question 18 – Do you prepare any reports on dangerous goods operations for your senior management beyond the annual reporting requirement?

#### Question 19 – Why are reports not required?

Of the 268 DGSAs, 164 (61.19%) said "yes" to preparing other operational reports besides the annual report.

Out of the 104 who said "no" (38.81%) to further reports, 88 respondents provided reasons.

48 of these respondents said other reports were not required because of their specific role or the type/scale of their organisation:

- 21 respondents said they were within one of these categories:
  - Managing Director, Owner, Director;
  - Trade Association;
  - Trainer;
  - Police enforcement;
  - Other: new DGSA role, had no customers, no transport involved, in a consultancy role, due to the type of work, external DGSA, freelancer.
- 14 respondents within these areas said:
  - They were not asked to do so;
  - The annual report is sufficient;

- Nothing more is required by legislation or ADR.
- 13 respondents mentioned that it was not required due to:
  - The scale of operations being small;
  - Limited quantities.

There were 40 further respondents who provided other reasons for no further reports:

- 26 respondents mentioned reasons such as:
  - Other forms of reporting or communications;
  - Had good communication;
  - They prepared reports for clients;
  - They reported ad hoc;
  - They reported when issues arose;
  - The security plan was updated;
  - They kept a log of information in case it was needed.
- 14 mentioned that others completed the reports.

# Question 20 – What types of reports do you prepare for senior management?

# Question 21 – How often do you generally provide these reports?

We heard from 163 out of the 268 DGSAs on the types of reports created, with some responses falling under multiple categories. The majority of responses of 127 (77.91%) identified risks and issues as the topic of reports:

Table 17: Types of reports prepared, multiple options available (% worked out from 163 DGSAs)

Answer choices	Response total	Response percent
Risks and issues	127	77.91%
Reoccurring incidents	72	44.17%
Frequency of incidents	69	42.33%
Goals and milestones	48	29.45%
Another type of report	58	35.58%

When asked about the "another type of report" prepared for senior management, there were 55 respondents and some provided several answers:

- 38 respondents mentioned legislative or regulatory requirements;
- 10 mentioned management monitoring performance and improvement, with eight on safety;
- Three mentioned learning;
- Three mentioned products stored and despatched;
- Some DGSAs reported on improvements including through monitoring statistics, trends, research and evaluation.

164 respondents replied on the frequency of management reporting, with 45 (27.44%) saying annually:

Table 18: Frequency of providing reports to senior management

Answer choices	Response total	Response percent
Annually	45	27.44%
Monthly	38	23.17%
Quarterly	33	20.12%
Half-yearly	15	9.15%
Another time	33	20.12%

When we asked for more details about the "another time" answer, 27 respondents mentioned "ad hoc" or "as required" reasons, whilst three said it varied on the report/client; there was also one response each for "weekly", "continually", and "when there is a new client".

#### The following questions were directed to DGSA employers.

#### Question 22 - You:

11 employers took part in the call for evidence; the majority use the services of external DGSA contractors.

Table 19: Employing a DGSA

Answer choices	Response total	Response percent
Employ DGSAs as direct employees	4	36.36%
Use the services of external DGSA contractors	7	63.64%
Employ DGSAs as direct employees and use the services of external DGSA contactors	0	0%

### Question 23 – Overall how easy or hard did your organisation find it to recruit DGSAs?

Of the 11 employers, three found it easy five found it neither easy nor hard, one found it hard and two found it very hard to recruit DGSAs.

#### Question 24 – Your organisation recruited your DGSA via:

The majority of employers recruited a DGSA through contacts (63.64%), and one employer recruited through their own organisation.

Table 20: DGSA recruitment

Answer choices	Response total	Response percent
The list of DGSAs on gov.uk	0	0%
Through contacts	7	63.64%
Through advertisement	3	27.27%
Another way	1	9.09%

### Question 25 – Is your organisation aware of what a DGSA's role is?

All 11 employers stated they were aware what a DGSA's role is.

# Question 26 – How many hours per week on average, does the DGSA spend undertaking their DGSA role?

Five employers (45.45%) said they spend less than one hour weekly on their DGSA role.

Table 21: Weekly hours spent by DGSAs in their DGSA role (% worked out from the 11 employers)

Answer choices	Response total	Response percent
Less than 1 hour	5	45.45%
1 and up to 5 hours	1	9.09%
Between 5 and up to 10 hours	1	9.09%
Between 10 and up to 15 hours	2	18.18%
Between 15 and up to 20 hours	1	9.09%
Over 20 hours	1	9.09%

When asked about the reason for spending "over 20 hours" undertaking their role, this employer stated that as their DGSA is employed full-time, they spend all their time on the role.

#### **Question 27 – The size of your organisation:**

The 11 employers answered on their organisation's size:

Table 22: Organisation size

Answer choices	Response total	Response percent
Less than 10 employees	3	27.27%
10-250 employees	3	27.27%
More than 250 employees	5	45.45%

- When employers with more than 250 employees were asked for more precise numbers of employees:
- Two employers said 6000;
- One said 7000;
- One said 800;
- The last one didn't give a more specific number.

# Question 28 – Do you train your staff in the requirements related to dangerous goods?

# Question 29 – What challenges exist that mean your staff are not trained in the requirements of dangerous goods?

As all 11 employers said yes to their staff being trained, Question 29 is not applicable.

### Question 30 – How does your organisation train staff in this area?

The 11 employers answered in different ways, with multiple category answers chosen. Some of the employers provided generic responses without mentioning a specific class, but said staff are trained through inhouse training, external training or DGSA trainers, through ongoing continuous training, and annual or refresher training. Three employers specifically mentioned Class 7 training.

# **Question 31 – Does your organisation maintain staff training records?**

All 11 employers answered "yes".

### Question 32 – On average, what is the annual tonnage, in kilograms, that your organisation transports:

Respondents indicated that they handle a variety of dangerous goods classes, with multiple answers chosen. Eight of the 11 employers transported Class 7.

There were 16 responses saying they "don't know" the tonnage of a class, but there was no additional question asking the reasons for this uncertainty.

- One employer stated that they transport above 1,000,000kg of Class 3;
- Three employers said they transport 100,001-1,000,000kg one of Class 2.1, one of Class 7, and one of Class 8;
- One employer said they transport 1,001-10,000kg of Class 6.2;
- Six employers said they transport 1-1,000kg, with one employer for Class 2.1, and five employers for Class 7.

Questions 33 to 36 received only three responses. These responses are not reported to protect the confidentiality of the respondents.

The following questions were on knowledge and skills.

Question 38 – Do you do any continued professional development to build your knowledge in the area of dangerous goods?

# Question 39 – The reasons you don't undertake continuing professional development are:

We heard from all 268 DGSAs; 240 (89.55%) said "yes" and 28 (10.45%) said "no" to Question 38. For the "no" category, 30 respondents provided reasons, selecting multiple category answers. 17 (56.67%) responses said that time was a factor for not doing continuous professional development (CPD).

Table 23: Reasons for no CPD (% worked out from 30 DGSAs)

Answer choices	Response total	Response percent
Time	17	56.67%
Finance	8	26.67%
Lack of legal requirement	7	23.33%
Lack of management support	5	16.67%
Another reason	11	36.67%

Table 24: Other reasons provided to not undertake CPD

Theme/category	Number of responses
Not aware of any available CPD/where to find information	3
Not required	2
Had minimal dangerous goods duties	1
A recently qualified DGSA	1
Updates and information are available	1
Logged their CPD under another professional body	1
Didn't know where to find CPD information	1

# Question 40 – What CPD do you take to build your knowledge in the area of dangerous goods?

We heard from 240 respondents with multiple answers chosen, 175 (72.92%) gained knowledge through training. A minority (41) of respondents gained some or all of their knowledge through another type of development not listed on table 25, of which 40 provided reasons with multiple category answers (table 26).

Table 25: CPD type taken to build knowledge in dangerous goods

Answer choices	Response total	Response percent
Training	175	72.92%
On the job learning	160	66.67%
Professional membership	153	63.75%
Research	150	62.50%
Making contacts	130	54.17%
Another type of development	41	17.08%

Table 26: Another type of development

Theme/category	Number of responses
Industry events and networking including: seminars and events; communicating with colleagues and others in industry; communicating with regulators and legislators; Trade Associations	19
Formal learning and training including: BADGP (British Association of Dangerous Goods Professionals) DGSA development programme; training course development; external training provider; shadowing	12
Self-directed learning and research including: updates from websites, forums and email subscriptions; reading articles and publications; social media; peer review	11
Regulatory and practical knowledge development including: following regulations; developing knowledge of DG applications of different countries; multimodal knowledge	3
Professional engagement and application including: BADGP membership; communicating with customers	2

### The following questions focussed on professional organisation membership.

# Question 41 – Are you a member of a professional organisation that relates to your role as a DGSA?

153 respondents answered this question, with 137 (89.54%) being a member of a professional organisation.

# Question 42 – The reason for not being a member of any professional organisation that relates to your role as DGSA is that you:

16 respondents answered with multiple choice categories allowed, half of which were not aware of an organisation to provide support (table 27).

Table 27: Another type of development (% worked out 16 DGSAs)

Answer choices	Response total	Response percent
Are not aware of organisations to provide support	8	50.00%
Financial costs in becoming a member	2	12.50%
Don't feel the need	1	6.25%
Have another reason	6	37.50%

Six stated another reason or reasons, which are displayed in Table 28 below.

Table 28: Other reasons provided for not being a member of a professional organisation related to DGSA role (these figures came from six respondents with multiple category answers)

Theme/category	Number of responses
Didn't see membership as valuable because they were not impressed with organisations knowledge of class 7 or that other colleagues are members and share information	3
Being a part of other kinds of membership	3
Costs involved, that either not cost effective or the company refused to pay membership costs	2

#### Question 43 - You belong to:

When we asked about the professional organisations respondents belonged to, 136 responses were received out of the 137. Membership was reported of:

- 118 of the British Association of Dangerous Goods Professionals (BADGP);
- Five of the Dangerous Goods Trainers Association;
- Three of the Dangerous Goods Advisory Council.

The remaining 43 respondents mentioned that they belonged to another organisation, including international associations:

- 22 said they belonged to national, international, safety, enforcement/justice, training, qualifications and engineering bodies;
- 17 named specific dangerous good types of organisations related to industry bodies including for: gas, chemicals, nuclear, explosives and waste;
- Six said they belonged to a transport or logistics organisation;
- Three did not specify.

#### The following questions were based around the DGSA qualification.

#### Question 44 – When will your DGSA qualification expire?

Out of the 185 (69.02%) DGSAs who said they had "beyond two years" before their DGSA qualification expires, 75 provided specific information: 38 certificates will expire in 2027-2028, and 37 in 2029-2030.

Table 29: When DGSA certificate expires (we heard from all 268 DGSAs)

Answer choices	Response total	Response percent
Beyond 2 years	185	69.02%
Between 1 and up to 2 years	50	18.66%
3 and up to 12 months	28	10.45%
Within next 3 months	5	1.87%

# Question 45 – Do you intend to renew your DGSA qualification when it expires?

When we asked the 268 DGSAs whether they would renew their certificates, 243 (90.67%) DGSAs said they would, whilst 25 (9.33%) said they would not.

#### Question 46 – The reason for not continuing as a DGSA is:

The 25 respondents who do not plan to renew their qualification gave reasons for not doing so, with more than one option being applicable for some. The majority of those who will not renew indicated that they plan to retire within the next five years.

Table 30: Reasons for not renewing DGSA certificate (as heard in Q45, the 25 respondents all provided reasons, with multiple answers chosen and the % worked out form the 25)

Answer choices	Response total	Response percent
Did not use the qualification	1	4%
Did not want to go through the exam process again	6	24%
Another reason	20	80%

Table 31: Other reasons provided for not wanting to renew their DGSA qualification (these figures came from the 20 respondents from Table 30 – with multiple category answers)

Theme/category	Number of responses
Age / retirement	16
Down to business needs	4
Rewards to retain staff	1

#### The following questions were based around the DGSA training

# Question 47 – When renewing your qualification will you complete any DGSA training?

We heard from the 243 DGSAs who had previously said "yes" to looking to renew their qualification when it expires, of which 181 (74.49%) would complete training, and 62 (25.51%) would not. This shows a much higher intention to complete DGSA training when renewing than to renew without further training.

#### Question 48 – Have you previously done any DGSA training?

234 (96.30%) of the 243 DGSAs said they had previously completed DGSA training, whilst nine (3.70%) had not.

# Question 49 – What was your view of the DGSA trainer/training provider:

The majority of DGSAs indicated that their training and training providers were "excellent/good" (89% and 88% respectively).

Table 32: Views of training and training providers

Answer choices	Excellent	Good	Neither good nor bad	Bad	Terrible	Response total
Training	132 (56.41%)	76 (32.48%)	17 (7.26%)	5 (2.14%)	4 (1.71%)	234

Training	145	60	23	4	2	224
provider	(61.97%)	(25.64%)	(9.83%)	(1.71%)	(0.85%)	234

When we explored the reasons, 170 respondents provided multiple category answers, some of which were:

- The majority of responses received, 124 out of 170, had experienced good or excellent training experiences, which were categorised as:
  - Having a good trainer;
  - Having a good training programme;
  - Training helped them with the exam;
  - Training provided good learning activities;
  - The training provider offered ongoing support after having taken the training.
- 36 out of the 170 responses concerned bad training experiences:
  - Training was not relevant to the DGSA role;
  - Training programme was not good;
  - Trainer was not good;
  - Training did not prepare them for the exam.
- 13 responses mentioned that the teaching focussed on the exam: these respondents suggested there is a tendency for the training to be focussed on teaching candidates to pass exams, resulting in some parts of the regulations being overlooked. This means that the training doesn't prepare the candidate for the DGSA role and isn't "true" learning.
- Seven responses mentioned that their training needs were not currently met, for reasons such as:
  - Not meeting the general needs of DGSAs;
  - Not filling training gaps such as support with audit reports, dangerous goods shipment framework, non-compliance, escalation of issues, technical applications;
  - Training materials haven't changed since the DGSA certification started;
  - Not teaching to a higher level of knowledge;
  - A shorter version of the training could be provided as "refresher" training.

 Four responses noted a lack of official guidance, such as a syllabus to be covered, information about exam requirements, and practice papers.

The following questions were based around the DGSA examination.

# Question 50 – In your view would it be more beneficial to be able to take the DGSA exams any time of the year, not just every quarter?

We heard from the 268 DGSAs with 155 (57.84%) saying "yes" and 113 (42.16%) saying "no". 191 respondents provided reasons on whether exams should or should not be taken at any time.

There were mixed views, with 114 respondents wanting more dates to allow for flexibility which could also encourage more businesses to comply. However, some respondents suggested it could be challenging for training providers to get enough numbers on courses to justify costs.

From the 113 respondents who had not wanted changes to the exam periods, 77 provided reasons, with multiple responses given:

- 39 responses were in favour of the current quarterly arrangement. This was because:
  - It covered the current requirements;
  - It had enough dates and locations available;
  - The length of the exam lends itself to being held quarterly;
  - It is common practice to run the exams quarterly.
- 24 responses said that the current quarterly arrangement:
  - Is compatible with work planning;
  - Provides time to plan and study for the exam;
  - Enables contingency for re-taking an exam.

#### Besides:

- They had concerns over the timing of exam results if they were not held quarterly;
- Set dates are more manageable; committing to an exam is easier if there is a date to work towards.
- 26 responses mentioned reasons for keeping the quarterly arrangement:

- It fits the current model of training, including training schedules and practices;
- It is more cost effective to run training in batches towards quarterly exams, as it enables larger cohorts – some had concerns over costs, with not enough candidates to justify switching to an "any time" model, and that it would be difficult to organise exams;
- o It provides a better experience and networking opportunities for trainees.

Of the 155 respondents who asked for different exam periods, 114 provided reasons, with multiple responses given, including:

- 63 responses (a majority) suggested that an "any time" model was more flexible and convenient:
  - Candidates would be able to secure an exam at a preferred location or additional dates;
  - They would avoid long waiting lists or a struggle to find an exam place;
  - This would avoid issues if someone were not able to make the exam or were to miss it due to unforeseen events;
  - The quarterly model was seen as inflexible with a long wait between exam periods.
- 41 responses suggested the ability to fit the exams around workloads and business needs:
  - DGSAs could become qualified quicker;
  - It would allow more scope for employers to adhere to ADR.
- 25 responses made comments relating to the following points about the "any time" model:
  - It could address failed exams quicker;
  - In the current model, exam results may not arrive in time to book and prepare for the next available exam;
  - Certificates might expire before an exam can be taken again;
  - It could present more opportunities for taking immediate resits.
- Eight responses mentioned the fact that it would be easier to plan and undertake training around the exam, although there were differing views on how beneficial it would be to have the training closer to the exams:
  - There would be more time to prepare or be ready for the exams;

- The quarterly model limits the capacity of training providers;
- Updates to regulations can cause problems for training providers and for timing around the exams.
- 10 responses mentioned other changes that would be welcomed:
  - Online exams;
  - More options on exam locations;
  - Monthly exams;
  - A modernised test such as multiple-choice responses;
  - Faster turnaround of results.
- Five responses gave other reasons for a preference for an "any time" model:
  - Less stressful;
  - Improve exam pass rates;
  - Reduce costs.

# Question 51 – With regards to the DGSA examination your preference would be to take the exam:

Out of the 268 DGSAs, 149 (55.60%) selected "on a computer" and 119 (44.40%) "by handwritten method".

The prevalence of the former could be explained by the fact that computers are widely used in daily lives; amendments are easier to do and readability could be clearer.

However, responses show concerns as to how the online system could work. For example, it would be more difficult to include drawings to explain answers, and harder to balance the use of the regulatory books, whether electronically or in paper version, with replying to the exam on a laptop.

198 respondents provided reasons for their chosen preferences.

Of the 119 respondents who selected "by handwritten method", 86 provided reasons, with multiple answers chosen:

- 62 respondents expressed general positivity towards handwritten exams:
  - They found it easier/quicker to write, review responses and notice mistakes;
  - Familiarity with being "used to" the format and being "old school";

- A cognitive/memory benefit when writing responses;
- Less distractions;
- The procedures are simple.
- Other views (28 responses) were that:
  - It preserved the quality of candidates;
  - They could draw to explain the answer which they might not be able to do on a computer;
  - It tested knowledge and use of the regulatory book;
  - It more closely reflected the work of a DGSA;
  - It was more compatible with working with the regulatory book;
  - It is difficult to look at the regulatory book electronically, or both juggle the book and work on a computer simultaneously.
- 19 responses expressed negative views towards computer-based exams:
  - The question selection could be more rigid;
  - Computers are not suitable for everyone;
  - They don't like using computers;
  - Some may have inadequate computer skills to complete the exam on a computer;
  - There was a fear that a different format could impact the quality of candidates;
  - Computer exams test different skills and/or knowledge than a handwritten test, and there could be IT issues;
  - There was also a belief that cheating is more likely on a computer;
  - The exam may take longer, or timings would need to be altered.
- Although four responses had selected that they preferred handwritten exams, they
  indicated that they recognised the positive aspects of computer-based exams, for the
  following reasons:
  - It would remove handwriting issues / responses would be more legible;
  - It would be easier to run more exams;
  - They could be completed online;

Candidates wouldn't run out of space.

Out of the 149 of the 268 DGSAs who selected a preference for computer-based exams, 112 provided reasons, with multiple reasons given:

- It takes longer to hand-write / it is quicker to type responses;
- Responses are easily checked and amendments made;
- There is more space for responses on a computer;
- Handwriting could negatively influence the exam performance if illegible, so computer-based exams are easier for the assessor to read and mark;
- Computer exams could present the possibility of instant or quicker access to exam results;
- It is more comfortable to use a computer:
- It would be more accessible and convenient;
- Using computers is seen as "greener";
- It reflects the way things are commonly done as part of contemporary practice;
- Some respondents also referred to the ADR driver exams which is conducted on a computer, and that it more closely matched the reality of DGSA work.

# Question 52 – When previously taking the DGSA exam, did you find there was sufficient guidance on what is required in the DGSA exam and how to respond to exam questions:

We heard from the 268 DGSAs; the vast majority found that there was sufficient guidance provided for exams.

Table 33: Exam Guidance

Answer choices	Yes	No	Don't know	Response total
What is required in the DGSA exam	240 (89.55%)	25 (9.33%)	3 (1.12%)	268
How to respond to exam questions	218 (81.34%)	47 (17.54%)	3 (1.12%)	268

#### The following questions were based around guidance & regulations.

#### Question 53 - You use:

We heard from all the 268 DGSAs on guidance and regulations they used, with multiple answers available. For each piece of guidance and regulations, the majority answer is highlighted in bold.

The Office for Nuclear Regulation (ONR) information was not used by the majority for either answering queries or being kept informed – ONR is the competent authority specifically dealing with Class 7 dangerous goods, so the use of this information is likely to be limited to those dealing with Class 7.

Table 34: Guidance & Regulations Used

You use: Answer choices:	Yes	No	Don't know	Response total
Professional membership information and contacts:	182 (70.54%)	74 (28.68%)	2 (0.78%)	258
Department for Transport information and contacts:	164 (63.57%)	91 (35.27%)	3 (1.16%)	258
Health & Safety Executive (HSE) information and contacts:	162 (63.53%)	88 (34.51%)	5 (1.96%)	255
Office for Nuclear Regulation (ONR) information and contacts:	75 (29.41%)	178 (69.80%)	2 (0.78%)	255
Updates from training providers:	150 (57.47%)	110 (42.15%)	1 (0.38%)	261
Other organisational newsletters and information contacts:	185 (71.98%)	68 (26.46%)	4 (1.56%)	257
You use: to keep yourself informed of	updates			
Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) guidance	234 (90.00%)	23 (8.85%)	3 (1.15%)	260
The International Carriage of Dangerous Goods by Rail (RID) guidance:	57 (23.65%)	182 (75.52%)	2 (0.83%)	241
The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations (CDG) 2009 regulations:	198 (77.34%)	53 (20.70%)	5 (1.95%)	256
The United Nations Economic Commission for Europe (UNECE) information and contacts:	113 (45.56%)	125 (50.40%)	10 (4.03%)	248
Professional membership information and contacts:	201 (79.45%)	48 (18.97%)	4 (1.58%)	253
Department for Transport information and contacts:	179 (70.75%)	71 (28.06%)	3 (1.19%)	253
Health & Safety Executive information and contacts:	169 (67.06%)	80 (31.75%)	3 (1.19%)	252

Office for Nuclear Regulation information and contacts:	81 (32.79%)	164 (66.40%)	2 (0.81%)	247
Updates from training providers:	176 (68.75%)	80 (31.25%)	0 (0.00%)	256
Other organisational newsletters and information contacts:	207 (81.82%)	41 (16.21%)	5 (1.98%)	253

#### Where DGSAs are not using guidance, regulations or getting organisational support, other sources were explored.

On "other sources" used, 87 respondents out of 268 provided information, which included:

- Networking through events and stakeholder groups;
- Other regulations relating to dangerous goods;
- Government resources;
- Other dangerous goods and transport regulators;
- Subject matter groups and trade associations, publications and magazines, and online resources.

Table 35: Other sources of information used (with multiple response answers chosen)

Theme/category	Number of responses
Using networking opportunities and events including: Contacts, colleagues and other DGSAs; LinkedIn; Conferences and events.	26
Using other regulations relating to dangerous goods or transport (plus international publications), including: IATA and IMDG Regulations: SSR6 and SSR26 - Regulations relating to the safe transportation of radioactive materials; CHCS Chemical Hazards and Safety Data Sheet; 49cfr - Code of Federal Regulations Title 49; The Regulation concerning the International Carriage of Dangerous Goods (RID)	24
Using subject matter groups and stakeholders including: British Association of Dangerous Goods Professionals (BADGP); Carriage of Dangerous Goods Practitioners Forum (CDGPF); Consortium (Organisation who provide support for Training Providers to deliver Dangerous Goods Drives Training (DGDT); Logistics UK; Road Haulage Association (RHA); UN WP15; Chemfreight; Barbour [Barbour EHS is an information service provider on compliance]	24
Different UK Government departments and agencies including: DfT, DEFRA, GOV.UK, DVSA, VCA, HSE, MOD, an unspecified Government committee was also mentioned.	19
Other DG regulators, organisations, subject matter groups and trade associations as sources of information, including: World Nuclear Transport Institute (WNTI), Radioactive Materials Transport User Committee (RAMTUC), National Chemical Emergency Centre	11

(NCEC), Pipeline and Hazardous Materials Safety Administration (PHMSA), Institute of Hazardous Materials Management (IHMM), Defence Nuclear Safety Regulator (DNSR), Office for Nuclear Regulation (ONR), Chemical Business Association (CBA), British Compressed Gases Association (BCGA), European Industrial Gases Association (EIGA) Professional and trade memberships as other sources of information,	
including: Completing CPD for other professions; Being a member of unnamed professional and trade groups; Being a member of specified trade associations and groups: Institution of Occupational Safety and Health (IOSH), Liquid Gas UK, TT club international, Chemical watch	11
Other specialist sources of information including: Customers, suppliers and manufacturers; Radiation Protection Advisor; Insurers; Distribution Network Operator	8
As well as stating their use of regulations within the main questions, regulations and specifically the UK road-based DG regulations as sources of information:	C
Dangerous Goods Regulations (DGR); the Carriage of Dangerous Goods (CDG); Agreement concerning the international carriage of dangerous goods by road (ADR); Authorisation 284 - Transporting dangerous goods by post	6
Using industry and trade magazines, journals and publications e.g. the ENDS report	6
Transport regulators, organisations and associations mentioned as follows: International Maritime Organisation (IMO); Civil Aviation Authority (CAA); The International Cargo Handling Coordination Association (ICHC); International Civil Aviation Organization (ICAO); Transport Safety Steering Committee (TRANSCC)	5
Non-specific online resources such as websites and YouTube	4
Miscellaneous non-specific responses e.g. anything that might have value	3
Rely on their own experience	1
Overseas government sources e.g. UNECE website	2

The following questions were based around the information currently available.

# Question 54 – Generally, do you feel there is currently enough information available to deal with a dangerous goods enquiry?

We heard from the 268 DGSAs on whether sufficient information was available, 227 (84.70%) felt it was, whilst 41 (15.30%) did not.

### Question 55 – What additional information would you like to be made available?

39 DGSAs answered and chose multiple answers. Requirements suggested included:

- 14 wanted support on specific information and resources;
- 10 wanted improved access and better communications from the Government;

- Six wanted support on complying with regulatory requirements;
- Six wanted more accessible and simplified guidance;
- Four wanted a public database of information and centralised resources.

#### The following questions were based on DGSA support.

# Question 56 – In your view, are DGSAs sufficiently supported within your organisation?

# Question 57 – What additional support do you feel would help?

216 (80.60%) out of the 268 DGSAs said they were sufficiently supported, whilst 52 (19.40%) felt they were not.

The latter identified potential types of additional support they would like within their organisations.

The most frequently cited factor was a greater recognition of the role of DGSA within their company/industry and better working conditions, for example being recognised as a profession and receiving better communications to be kept informed.

Many responses identified ongoing guidance, support and training as being valuable to their role, along with access to a network of other DGSAs. A lack of enforcement was noted with better enforcement practices needed, to address a perceived lack of interest in compliance within businesses and industries.

### Question 58 – What support do you currently utilise or are aware of?

265 out of the 268 DGSAs responded, with multiple category answers provided, some of which were:

- 316 responses were based on industry, trade, and support by other associations;
- 75 responses were centred around regulatory authority support;
- 47 responses were on other types of resources;
- On reasons for not using anything, 21 responses pointed to a lack of support in general and found it difficult to access support.

The following questions were based around the audit report.

Question 59 – How confident are you in producing the annual audit report as required under the requirements set out in ADR chapter 1.8.3.3? (ADR 2025 - Agreement concerning the International Carriage of Dangerous Goods by Road | UNECE)

We heard from the 268 DGSAs; 182 (67.91%) said they were confident, 74 (27.61%) were neither confident or not confident, and 12 (4.48%) were not confident.

# Question 60 – Is there any further guidance that you think would help you when producing the annual audit report?

#### Question 61 – What further guidance would you like?

Out of 268 DGSAs, 128 (47.76%) asked for further guidance on how to produce the annual audit reports, whilst 140 (52.24%) did not.

We heard from the 128 respondents on what type of guidance they would like:

- 95 requested to see a standardised template or range of templates for audit reporting to outline the minimum required content and/or a checklist of items to include;
- 23 mentioned using templates provided by other organisations and regulators, or that they have developed themselves;
- 13 complained about the lack of consistency on reports which can cause problems;
- 27 requested more information, guidance and instructions relevant to their role and reporting in particular, such as examples of reports and practical tips on how to conduct audits;
- Four suggested a reporting portal / system for routine reports and major issues.

The following questions were based around Class 7 dangerous goods.

# Question 62 – Do you have any involvement with Class 7 goods?

Out of the 268 DGSAs, 80 (29.85%) were involved in Class 7, whilst 188 (70.15%) were not.

# Question 63 – What, if any, further guidance do you think would help you when producing a report for Class 7 goods?

On whether further guidance was required for Class 7 reporting, 78 DGSAs (out of the 80 involved in Class 7) provided reasons for or against changes, with some answers falling into multiple categories. The most commonly mentioned categories have been highlighted in bold in the right column of the table.

Table 36: Class 7 requirements (with multiple response answers chosen)

#### Further change needed:

Further training: improvements; Radiation Protection; Handling incidents; emergency response	11
Further exams needed	3
Further support needed: exposure to expertise, people, orgs; right contacts; updates from ONR & BADGP	3
Further information needed: simple/expanded information; provide good & bad examples; audit information; security report; where to find information; Activity; specific report	23
Further clarity of ADR requirements	1
No change needed:	
The report guidance available and understands	19
Answered as none/no/n/a – but no reason provided	13
Already have support from: Radiation Protection Advisor; industry; stakeholders	7
Did not want anything else as responses included: only deal with excepted quantities; other DGSA deal with; experienced in my field; covered in ADR/IRR	5
ONR provide adequate guidance, but some DGSAs have lack of knowledge	1

# Question 64 – Do you think there should be a separate Class 7 exam before a DGSA is qualified to advise on Class 7 matters?

There were 81 respondents to this question; 54 (66.67%) agreed with the need for a change, and 19 (23.46%) didn't see a need to separate out Class 7. Eight (9.88%) answered "don't know".

# Question 65 – Why do you think there should be a separate Class 7 exam before a DGSA is qualified to advise on Class 7 matters?

70 DGSAs provided reasons for wanting a separate exam or for maintaining the current system, with the majority recognising a need for a change.

Table 37: Reasons for changing or not changing Class 7 exams (multiple answers chosen)

Reasons for "change required":	Number of responses
More required due to the following reasons: more knowledge required, to be tested upon, with Class 7 being a specialised area, more competency is required including for trainers, and that Class 7 needs to be expanded upon	38
A vast/complex area/different regulations	11
Class 1 changes specifically required	4
Change required for all specialised classes, could have exams on separate classes or more on all classes	4
Standardisation across the modes of transport such as to mirror the air regulations	2
the radiation protection role as training/qualification	4
Reasons for "no change required":	
Various reasons provided as: there was little take up when it was previously tried; it is just another DG class; DGSAs are not competent/of right calibre/there is a need for more training and questions for Class 7 for competency; better ADR written/layout and DGSA guidance; we should do the same for all 9 classes either together or individually; they can refer to regulations; all classes are specialised; there is the radiation protection role where there are necessary requirements; the current situation meets company needs; they know where to find specific class information.	16

#### The following questions are based around further testing.

# Question 66 – Do you think there should be a separate exam for DGSAs only advising consignors or carriers:

268 DGSAs answered with a majority not wanting a separate exam on advising consignors only or carriers only (74.63% and 74.25% respectively), as highlighted in bold in Table 37.

Table 38: Exam for DGSA advising Consignors / Carriers

Answer choices	Yes	No	Don't know	Response total
Consignors	38 (14.18%)	200 (74.63%)	30 (11.19%)	268
Carriers	37 (13.81%)	199 (74.25%)	32 (11.94%)	268

193 respondents provided reasons for wanting no change, split into two themes:

 142 respondents believed exams are already comprehensive and should remain holistic to allow flexibility; 43 respondents felt there will be resulting issues if exams are split as DGSAs will have no knowledge of wider dangerous goods work and changes may reduce the number of DGSAs; Eight responses suggested changes to training and other areas instead of exams.

28 respondents gave reasons for change which was split into the following themes:

- A requirement for specific classes, roles, training, business needs/awareness;
- For different transport modes to be standardised/aligned, ensuring compliance;
- For the wider staff to be trained, consignors trained;
- To not be manufacturer-biased.

Seven respondents who fell into the "don't know" theme for separate exams, provided reasons shown in the themes of:

- Possibly;
- Not enough information;
- Role/class specific;
- Separate modules so role specific and business efficiency;
- For radioactive materials;
- No change is required;
- Holistic view to cover all.

Two respondents provided **mixed views on yes and no for change**, for reasons such as "role or mode specific", and advising in packaging or bulk.

#### The following question was based on any final comments.

#### Question 67 - Any other comments?

From the 292 respondents, 176 provided views, with multiple comments received from some. These have been distilled into 19 themes.

A number of responses requested improvements in the support and guidance available.

There were a number of comments around the exams, such as improvements being needed to the practicalities, administration, feedback and content, as well as a requirement on the need to test DGSA knowledge differently, for instance with more case studies in line with the DGSA role.

On DGSA training and whether improvements or updates were needed on training processes and content, a need for more content on Classes 1 and 7 was highlighted. An ongoing need for more access to training post-qualification for continued professional

development was also expressed, as well as a greater knowledge base on dangerous goods issues in multi-modal transport. A few mentioned better-defined regulations to understand their roles.

Finally, we heard about concerns from DGSAs as professionals and a need for better recognition and understanding of their role as a profession. Concerns were also expressed about business compliance with dangerous goods regulations, and some respondents thought that oversight of the wider DGSA community would be a positive change, with more support from the Government.

#### **Responses and Categorisations:**

There were 49 responses linked **to improving support and guidance from the Government and authorities** such as support for new DGSAs, seminars, enforcement visits, better responsiveness to queries and general approachability, emergency contacts, more information, updates and policy changes, best practice and practical guidance to support day-to-day work, explaining the qualification process, completing the Transport Document, for retailers on selling dangerous goods, common transgressions and how to avoid them, interpretation of new requirements, open register of UN certified packaging, and templates.

Eight respondents wished to see **improvements on the annual report process** including suggestions for a standardised format with identified areas of non-compliance, guidance for completing the report, and site visits to accompany the completion of annual reports. One respondent mentioned that one size does not fit all on reporting.

Six respondents noted **BADGP** and their resources are useful.

43 provided comments on **exam practicalities and administration**: six mentioned being satisfied with the current exam arrangements, with one response saying that exams should be difficult, and another that time available was fair.

Many respondents suggested that there was room for improvement for different reasons:

- Overall, exams are poorly administered, they can be stressful and having to write makes them slow and laborious;
- The booking process is difficult and outdated, resits could be prioritised, exams could be conducted on a computer/online;
- A more flexible or on-demand approach to exam dates/locations is needed;
- The time allocated for exams causes difficulties, more time is needed;
- Exams could be more spread out rather than trying to fit them all into one day;
- The exam format rather than entirely writing-based should be more interactive and include multiple-choice questions;

- The requirement to write out full reference numbers could be removed, better exam rooms and desks and spare copies of the regulatory books could be made available;
- More support for people with additional needs such as dyslexia.

25 respondents asked **for better exam feedback** such as receiving it sooner, with a percentage of the mark achieved and details of failed questions to know the areas for improvement, and to allow benchmarking against feedback from other qualification providers (NEBOSH, SEGA, CILT).

21 responses commented on **exam content and difficulty** including that more oversight of exam content was needed as some is out of date and inconsistent, the content should be reviewed to avoid confusion in line with updates to the regulations, Class 1 is currently not tested, the exams are too difficult either in content or the way questions are worded, exam questions should be more relevant particularly to DGSA roles such as testing the understanding of a greater depth of knowledge rather than the ability to "lift words from a book" and include a focus on the role of other regulations (not just road-based), and finally the question format could be changed for instance with direct questions versus case studies.

17 respondents wanted a modular or specialism approach to exams and qualifications in general, so DGSAs could only gain qualifications in the class their employer handles, or the exams could be directed to specific roles, such as carrier, consignee and consignor, which would allow the possibility of targeted qualifications.

13 respondents suggested **changes to the exams/certification model** with many stating that the model is outdated and needs a refresh. Comments suggested more frequent exams, combining multiple qualifications into single exams e.g. ADR, RID, IATA, IMDG, exams brought in line with other similar specialisms, a differentiation between bulk carriage and packaged goods qualifications, and for research to be conducted into the high failure rate of DGSA exams.

Seven comments discussed potential **updates to the re-certification process/model** noting that re-certification every five years is expensive and that it should be reconsidered, perhaps replaced with a formal refresher process. There was a response on potential skill-fade over five years.

14 responses concerned **DGSA training** and whilst one respondent thought it was "ok", another commented that it did not prepare them for the exam. These comments mentioned areas for improvement or updates needed for training processes and content, including:

- Concerns that training does not cover Classes 1 and 7, or that there should be specific training for these and/or bespoke courses which do not need to cover all classes;
- Having a refresher training mid-way through the certification period or at the point of re-certification, rather than a full five-day course prior to each exam;
- Training to be provided after updates to the regulations every two years;

- A training programme such as an app to accompany courses;
- More availability of training in the Northern regions of the UK;
- Specific topics to be covered by training such as packages, bulk and tanker, Health and safety, environmental;
- More on dangerous goods regulations.

Seven comments noted the need for **more access to training** including ongoing official continued professional development, and that training should be easier to find especially for in-house DGSAs. It was also suggested that four to five days of training is not enough, and that on-the-job training is important.

Eight responses called for **DGSAs to have knowledge of dangerous goods issues throughout multi-modal transport** as it is important for an island nation.

Seven responses mentioned **regulations** and whilst some thought ADR was succinct and easy to follow, others found it difficult to navigate and that it should be more "black and white" in some places. Inconsistent interpretation of the regulations was also mentioned, with some specific topics suggested to be included such as responsibilities of fillers, packers and loaders, and to have an online lookup facility for UN numbers.

15 responses mentioned **concerns about business compliance with dangerous goods regulations** more generally and measures to address this. Some mentioned that improvements were already being made. Concerns were raised over companies handling dangerous goods without using a DGSA, companies showing dangerous behaviours in transporting dangerous goods, a lack of understanding of how to transport certain dangerous goods including lithium-ion batteries and vapes. Comments asked for more enforcement to encourage companies/carriers to use a DGSA, such as roadside checks and publication of roadside checks and prosecutions, and that this information could be available to relevant DGSAs to report on the compliance of individual companies.

21 DGSAs wanted better recognition and understanding of the DGSA role as a profession due to the valuable contribution made by DGSAs to companies/industries, "the role needs selling to the next generation", with more awareness needed of the responsibilities and value of DGSAs, more awareness of the legal requirement to use a DGSA, more respect among employers of the advice of DGSAs, professionalisation of the role such as through a license card, recognition of specialisms, and more recognition among employers of the need to provide continued professional development for their inhouse DGSAs.

13 responses expressed concerns over the level of **oversight of the wider DGSA community** including the need for more regulatory oversight of DGSA activities and their appointment by companies, clear expectations from the regulator on the DGSA role, and concerns over the inconsistent way DGSAs are certified at an international level. With an increase in cut price consultancy services offered, it creates an imbalance of consultancy versus in-house DGSAs, and there were concerns over the quality of the work of consultancies with several companies allocated to one DGSA. It was noted that there could be a limit on how many companies are allocated to a DGSA and the number of

hours dedicated to DGSA responsibilities, which should be proportionate to the nature of the business.

Five responses related to the **survey consultation** itself, with some finding it a positive process, but two respondents mentioned that it was not tailored towards trade associations.

Three responses were **miscellaneous** and not categorised. A suggestion was to create an official register with a DGSA's number of years of experience within a given class of dangerous goods as a motivation for people to become experts. One respondent thought that consumers need more information about purchasing and returning items with dangerous goods elements.

Five responses were excluded as being either incomplete or not relevant to the question, and another three responses were excluded as they offered a clarification on previous responses in the consultation.

#### Summary of the Government's response

#### The Survey Results

The DGSA survey was completed by a small percentage of the wider DGSA numbers, around 12% from a total of 2,226 (as of March 2025). While a higher response rate would have provided more robust data, the data we received nonetheless provides insight into the views and preferences of DGSAs and changes they would like to see. Throughout the survey analysis, we have drawn out themes from the comments received.

Survey responses identified some areas for possible changes that respondents would welcome in relation to the DGSA profession, including how they are qualified, how they communicate and report to authorities, and how enforcement is handled. Some changes would require additional public consultation and legislation, which could be considered if parliamentary time allows.

There was also a high level of satisfaction in some areas including with training and training providers and in many cases organisational support of DGSAs.

#### **Continuing Professional Development (CPD)**

 Q38-40: 240 (89.55%) of the 268 DGSAs said they did receive CPD. Some of the reasons provided for those not receiving it were time and not being aware of any available CPD or where to find it or they didn't feel it was required.

The numbers indicate that a majority do gain CPD, or gain it through on-the-job learning, but there could be more development opportunities available for DGSAs that don't currently receive CPD. We will work with representative bodies such as BADGP and the TAP, alongside DVSA to develop and promote CPD programmes that will most benefit DGSAs in performing their function.

The Department and DVSA are developing a database of DGSA contact details, in particular email addresses, through which we will be able to distribute updates and guidance to support CPD.

#### **Training**

- Q47-49: when DGSAs said they would be renewing their qualification, we asked whether they would complete training. There were 243 responses received, with 181 (74.49%) saying "yes" to planning to complete a training course, whilst 62 (25.51%) said "no".
  - o On views of the training and training providers, the majority of 124 (72.94%) had good training experiences.
- Q67: 36 of the 176 respondents commented on DGSA training improvements or updates of the training processes and content, such as:
  - More access to training post qualification for continued professional development, including in Northern regions.
  - More knowledge base on dangerous goods issues in multi-modal transport;
     specific training on Classes 1 and 7, packages, bulk and tanker, Health and
     Safety, environmental; and accessible information such as UN numbers online.

These indicate that although training is undertaken by the majority upon renewal of their qualification, not all do. Similar to CPD, we will work with the same bodies to consider how training can best support the DGSA's day-to-day job as well as their exam preparation.

#### **Exams**

- Q50: 155 (57.84%) out of 268 DGSAs requested for exams to be taken more regularly, whilst 113 (42.16%) said "no".
- Q51: for exams taken on a computer or handwritten, 149 (55.60%) out of 268 DGSAs preferred by computer, 119 (44.40%) DGSAs by handwritten.
- Q67: there were 126 comments received on exams with suggestions for improvements to the practicalities, administration, feedback, and content of the exams, as well as a requirement to test DGSA knowledge differently, for example using case studies in line with the DGSA role. Other suggestions were received on whether there is a need to consider a modular or specialism approach to exams and qualifications. Some also felt that a change was required on the certification model and the re-certification process. Exam feedback could be received sooner, with marks and details of failed questions in order to know areas of improvement.

Should a switch to computer-based exams take place in future, consideration will be given to issues raised including detailed design and accessibility to mitigate any negative impacts.

Since the survey took place, DVSA have increased the level of feedback provided to candidates: candidates now receive a breakdown of their marks. DVSA have received positive feedback regarding these changes. We will await further feedback before considering other changes.

### Official Support, Guidance, Regulations, other sources of information

- Q53 asked about guidance and regulations used to deal with enquiries and how DGSAs are kept informed. The majority of respondents were aware of, and used, various existing resources to maintain their skills and knowledge. There was, however, a minority who was not familiar with guidance materials available to them. The Department will consider how to better promote awareness.
- Q54: on whether DGSAs felt enough information was available to deal with a
  dangerous goods enquiry, the majority of 227 (84.70%) from 268 DGSAs felt it was.
  With consideration to the views received from the minority who felt there wasn't
  enough support, areas for improvements mentioned included support on specific
  information and resources, improved access and better communications with the
  Government, support on complying with regulatory requirements, accessibility and
  ease of a simplified guidance, and a public database of information and centralised
  resources.
- Q59-61: these were centred on audit reports where 182 (67.91%) out of 268 DGSAs said they felt confident about producing reports; 74 (27.61%) responses felt neither confident or not confident, and 12 (4.48%) didn't feel confident. Furthermore, 95 responses requested audit reporting templates on the minimum required content and/or a checklist of items to include. 27 respondents requested more information, guidance and instructions relevant to their role and reporting, such as examples of reports and practical tips on how to conduct audits.

We currently provide support to industry by regularly reviewing and updating the dangerous goods guidance pages on gov.uk. These updates reflect evolving regulations and industry needs, incorporating insights from communications with stakeholders. A wide range of guidance notes on specific topics is available at Transporting dangerous goods, and when further information is needed, email support is accessible through the Department for Transport and other Government bodies.

The survey highlighted areas where improvements can be made, particularly in publicising and promoting the resources available. Based on the feedback received, we will explore ways to enhance outreach so that those who need it know where to find the right information.

One specific area of focus is the mandatory annual report produced by DGSAs. While ADR does not require a standardised template, respondents expressed a strong interest in having one available. We will develop a template for publication on gov.uk to support DGSAs in their reporting role and the clarity and consistency of reports.

#### Better employer support

 Q56-57: these were on whether organisational support and additional support is required. Although 216 (80.60%) of the 268 DGSAs felt sufficiently supported, the 52 (19.40%) respondents who felt insufficiently supported made suggestions on other support they could benefit from such as: better recognition of their professional role, better working conditions and being kept informed. Responses also identified ongoing guidance, support and training as being valuable to their role, along with access to a network of other DGSAs. A lack of enforcement was noted with better enforcement practices needed due to a perceived lack of interest in compliance within businesses and industries.

 Q67: it was highlighted by DGSAs that they would benefit from a better recognition and understanding of their role as a profession. Concerns were also expressed on business compliance with dangerous goods regulations as well as a lack of awareness of the importance of DGSAs needing more support to do this from the government.

We were pleased that the majority of DGSAs already feel sufficiently supported by their organisations and available information.

We understand the role of enforcement and publicly available information on enforcement actions in tackling non-compliance and incentivising compliant practices. The Department will consider the role and resourcing of enforcement further.

Companies handling specific types of dangerous goods are inspected by the Department's high-consequence dangerous goods (HCDG) team, and the Office for Nuclear Regulation (ONR) for Class 7 goods.

#### Class 7

- Q64-65: These questions were about whether a separate Class 7 exam is required to qualify as a DGSA and why.
- From the 268 DGSAs, only 81 responded, with 54 (66.67%) preferring a separate Class 7 exam, 19 (23.46%) didn't, and eight (9.88%) said "don't know".
- On reasons provided, 70 of the 81 responded, with 54 reasons in favour of changing the current situation around Class 7, and 16 against making changes. The majority of 38 respondents felt that more knowledge was required, and that this subject needed to be tested upon, due to being a specialised area, with more competency required including for trainers.
- Other respondents provided reasons for a change, such as:
  - 11 on being a vast, complex area, with different regulations;
  - Four on Class 1 changes;
  - Four found that all classes were specialised, so they would have exams on separate classes or more on all classes;
  - Two on a standardisation required across the modes of transport such as to mirror as it is by Air;
  - Four on the radiation protection role training/qualification.

- The respondents who didn't want to see the introduction of a specific Class 7 DGSA qualification stated:
  - They believe that Class 7 is just another class of dangerous goods;
  - More training and questions within the existing exam are needed for Class 7 for competency;
  - The same would be needed for all nine classes either together or individually as all classes are specialised;
  - The radiation protection role has the necessary requirements. However, as this
    is not correct, the Department and ONR views this mistake as highlighting the
    need for a separate exam for Class 7 to ensure compliance.

In order to improve the knowledge and skills of those working with Class 7 goods, a preference for changes to the DGSA qualification was expressed by many respondents. There is currently a recommended syllabus for Class 7 DGSAs created by RAMTUC (Radioactive Materials Transport User Committee). However, this is not mandatory.

The Department will work with the Office for Nuclear Regulation (ONR) to consider the introduction of a separate Class 7 DGSA exam for those handling Class 7 goods, or changes to make more Class 7 training mandatory.