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Open consultation

Driving licensing call for evidence

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Applies to England, Scotland and Wales

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This publication is available at <https://www.gov.uk/government/consultations/driving-licensing-review-call-for-evidence-on-opportunities-for-changes-to-the-driver-licensing-regime/driving-licensing-call-for-evidence>

Foreword

During the coronavirus (COVID-19) pandemic and the subsequent HGV driver shortage crisis, the UK government rapidly put [33 actions](https://www.gov.uk/government/topical-events/hgv-driver-shortage-uk-government-response/about) (<https://www.gov.uk/government/topical-events/hgv-driver-shortage-uk-government-response/about>) into place to address the circumstances that had arisen.

Eight of these actions came from expanding the HGV driver testing capacity and improving the licensing process. The licensing improvements were achievable partly due to the fact that we had left the European Union and had the freedom to change our legislation to improve our testing and licensing regime. We now wish to explore whether there are any further opportunities that could be available to us.

The call for evidence includes seeking evidence on the economic benefits of widening the recruitment pool for medium-sized goods vehicles and minibuses drivers, which may attract more people to the industry and support economic growth by further strengthening our supply chain.

It is clear that, prior to 1997, new drivers of any age had the freedom to drive a wider variety of vehicles, including cars with trailers. I, the Department for Transport and government are seeking opinions on reverting to these 'grandfather rights'.

Without being prescriptive, there are opportunities to explore whether drivers of other vehicles need to have certain periods of experience of road use in a car, or be of a certain age. Any changes would need to ensure continued safe use of our roads and be economically proportionate. Government does not have all the answers and, to be very clear, we have not made up our minds to do any of this.

That is why my team and I need to hear the views of those who help make our driver licensing regime efficient and safe and we will be guided by their feedback.

We have suggested 4 areas for exploration in this call for evidence, but we are open to further ideas. This is your opportunity to ensure that the opportunities that may be presenting themselves to us now that we have left the European Union can be considered by government.

Karl McCartney MP

Parliamentary Under Secretary of State for Transport

How to respond

The call for evidence period will begin on 5 August 2022 and will run until 28 October 2022. Please ensure that your response reaches us before the closing date.

You can contact licensing.consultation@dft.gov.uk if you need alternative formats (for example, braille or audio CD).

You can [respond online \(https://www.smartsurvey.co.uk/s/OF07U7/\)](https://www.smartsurvey.co.uk/s/OF07U7/).

Or you can [download a response form \(https://www.gov.uk/government/consultations/driving-licensing-review-call-for-evidence-on-opportunities-for-changes-to-the-driver-licensing-regime\)](https://www.gov.uk/government/consultations/driving-licensing-review-call-for-evidence-on-opportunities-for-changes-to-the-driver-licensing-regime) and either:

- email it to licensing.consultation@dft.gov.uk
- send it by post to

Department for Transport
Driver Licensing CfE
3rd Floor, Great Minster House
33 Horseferry Road
London
SW1P 4DR

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. If you have any suggestions of others who may wish to be involved in this process, please contact us.

C1 (7.5 tonnes) goods vehicle entitlement

To grant those drivers who have a car (category B) licence entitlement additional entitlement to an HGV (category C1) licence.

Background to C1 licences

Category C1 was originally introduced in the 1968 Vienna Convention on Road Traffic ('Vienna Convention'). The contracting parties agreed that the skills to handle a medium-sized vehicle were distinct enough to warrant a separate sub-category within category C.

The UK did not ratify the Vienna Convention until 2018, but the licence categories were adopted into domestic law through implementation of the EU Driving Licence Directives, namely the EU Second Driving Licence Directive (Directive 91/439/EEC) and, more recently, the EU Third Driving Licence Directive (Directive 2006/126/EC).

The C1 licence category covers medium-sized vehicles between 3.5 tonnes and 7.5 tonnes, plus a trailer of a [maximum authorised mass \(MAM\)](https://www.gov.uk/vehicle-weights-explained#maximum-authorized-mass) (<https://www.gov.uk/vehicle-weights-explained#maximum-authorized-mass>) of up to 750kg, which amounts to a combined total of 8.25 tonnes. For comparison, category B (car entitlement) allows vehicles up to 3.5 tonnes and alternatively fuelled vehicles up to 4.25 tonnes (the latter with 5 hours of additional training) for commercial carriage of goods.

The situation in the UK up until 1 January 1997 was that drivers who passed their car test also gained entitlement to drive a light lorry or van (C1 entitlement) without the need for a separate test. Those drivers retained the 'grandfather right' to continue to drive vehicles up to 8.25 tonnes.

Since 1 January 1997 (due to the EU Second Driving Licence Directive), a separate test has been required to obtain C1 entitlement.

It could be considered that now the UK has left the European Union, we may wish to return to the pre-1997 situation, by allowing most, if not all, car drivers to operate vehicles up to 8.25 tonnes (where the vehicle is between 3.5 and 7.5 tonnes plus a trailer with a MAM of up to 750kg).

This would not mean a return of C1E (107) entitlement. This was granted to pre-1997 car licence holders and relates to vehicle and trailer combinations of up to 8.25 tonnes, where the MAM of the trailer can exceed 750kg.

Currently, to obtain provisional C1 entitlement, a driver must undertake an examination by a General Medical Council (GMC) professional. You can view the [full list of requirements for C1](#).

The differences between category B and category C1, both in relation to those obtained pre-1997 and post-1997, are as follows.

Category B

- Minimum age 17.
- Must pass theory and practical driving tests.
- Practical driving test cannot include motorways.

Category C1

- Minimum age 18.
- Must hold category B entitlement.
- Medical assessment for all initial applications and a signed medical report is required for renewal when the holder reaches the age of 45 years, then every 5 years. Once the holder reaches the age of 65, this must be renewed annually.

- A C1 licence issued following a pre-1997 car test generally expires at 70, but could be sooner, if they are experiencing a relevant or prospective disability. To renew, the driver must submit a medical report and is subject to higher health standards than associated with a car licence.
- A C1 licence issued following a C1 test has an administrative validity period of 5 years and at each renewal the licence holder has to make a declaration about their health.
- A C1 licence issued following a C1 test is subject to higher health standards than those associated with a car licence from the outset. This is in addition to the initial and regular examination requirements at renewal from age 45.
- Driver certificate of professional competence (DCPC) is required for the commercial carriage of goods.
- Theory test content specific to larger vehicles (group 2 theory test).
- Additional practical test elements specific to larger vehicle (including safety factor related to loading).
- Practical driving test can include motorways (but not in Scotland).

In order to drive professionally for the commercial carriage of goods, C1 licence holders must also hold a professional qualification, the driver certificate of professional competence (DCPC). The qualification is obtained by undergoing an initial qualification and maintained by 5-yearly periodic training of 35 hours.

The initial qualification consists of 4 modules, including a practical test:

- module 1 - a theory test
- module 2 - case studies
- module 3a - off road manoeuvres including a coupling exercise if fitted with a trailer
- module 3b - an on-road test
- module 4 - a practical demonstration of vehicle operation

Once all 4 modules are passed, the driver receives a driver qualification card (DQC), which entitles them to drive professionally. Drivers are required to carry their DQC with them in the vehicle. Failure to do so is an offence.

In the case of C1 and D1 licence holders who gained this driving entitlement through 'grandfather rights', the initial DCPC qualification can be obtained by either:

- completing modules 2 and 4
- completing 35 hours of training within a 5-year period and then 35 hours training every subsequent 5 years

The requirement to hold a DCPC is set out in the Vehicle Drivers (Certificates of Professional Competence) Regulations 2007 which were made in order to implement directive 2003/59/EC of the European Parliament and of the Council of 15 July 2003 on the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passengers.

The requirement to hold a DCPC will remain extant if any other changes are brought to the C1 licensing regime.

This call for evidence is only seeking views on the current C1 licensing regime, we are not seeking views on the C1E licensing regime.

The C1 fleet and its use since 2000

Since 2000, both the number of C1 vehicles licenced and the overall distance travelled by these vehicles has declined by 58%, [from around 4.7 billion kilometres in 2000 to 2.0 billion kilometres in 2019](#)

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1006652/rfs0110.ods). Over this period, there have also been the following trends:

- a flattening of distances travelled by articulated HGVs
- increases in the number of licenced HGVs, with the heaviest weights (40 tonnes and over) [increasing from 29,8000 vehicles in 2000 to 108,500 vehicles in 2019](#) (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/985978/veh0521.ods), indicating a shift towards heavier vehicles to move more goods in one load
- large increases in distances travelled by lighter commercial vehicles under 3.5 tonnes (such as vans), which [increased by 71% between 2000 and 2019](#) (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/981975/tra0201.ods)

Some of the shift towards smaller vehicles may be explained by the introduction of C1 testing practices in 1997, but other factors, such as increase in 'last mile delivery' (the last leg of journey from a transportation hub to a final destination), are also likely explanations. There may be other factors. We are interested in views on this.

However, the number of category C1 tests has increased, from 4,900 in 2015 to 6,400 by 2019, with a typical pass rate of around 70%. A substantial majority of these will be police officers and paramedics.

This suggests that although the fleet and distance travelled has decreased, there is still an increasing need for qualified C1 licence holders to drive the current fleet. We welcome views on whether there is a need for more C1 licence holders to

ensure the current fleet can operate and if industry considers there to be a driver shortage in this space.

Road safety implications

Internal DfT analysis using STATS19 (which collects data on all road traffic accidents that resulted in personal injury and were reported to the police within 30 days) and C1 usage data suggests that, consistently from 2005 onwards, C1 vehicles have a higher rate of accidents than other HGVs per billion vehicle kilometres.

- In 2019, C1 vehicles were [involved with 23% \(982\) of accidents involving a goods vehicle over 3.5 tonnes \(4,339\)](https://data.gov.uk/dataset/cb7ae6f0-4be6-4935-9277-47e5ce24a11f/road-safety-data) (<https://data.gov.uk/dataset/cb7ae6f0-4be6-4935-9277-47e5ce24a11f/road-safety-data>), while representing only 7% of the total distance travelled for goods vehicles over 3.5 tonnes.
- When compared to all goods vehicles, regardless of weight (including vans), C1 represents 6% (982 of 17,808) of accidents.
- Compared to the number of accidents where a car or van is towing, in 2019 the number of C1 accidents were more than double (982 for C1, 472 for car and vans towing). However, given the recent change in removing the BE test these statistics will only be valid for comparison up to the 2021 casualty statistics.

The top 10 reasons why individuals currently fail their C1 test (which account for 64% of failures) are shown in the table below. The removal of the test could see individuals driving C1 vehicles with little or no experience and, when considering that 30% of drivers fail the test, this may increase the already higher accident rates.

	Manoeuvre	Average percentage of serious and dangerous faults
1	Reverse left - control	12%
2	Junctions - observation	10%
3	Mirrors - change direction	9%
4	Move off - safely	6%
5	Response to signs - traffic lights	6%
6	Junctions - turning right	6%

	Manoeuvre	Average percentage of serious and dangerous faults
7	Response to signs - road markings	4%
8	Judgement - meeting	4%
9	Control - steering	4%
10	Awareness and planning	4%

If C1 entitlement were to be granted with a category B licence, this may be used for leisure use, or towards a DCPC qualification for those who wish to go into commercial driving. Drivers who are employed for the commercial carriage of goods would remain in the scope of DCPC rules.

Given there could be road safety impacts, we are seeking balanced views as to whether any changes to the C1 licence regime could be changed in a positive way to help industry but without detrimental impacts on road safety.

DCPC qualifications

A policy review of DCPC rules, [announced in November 2021](https://www.gov.uk/government/news/government-announces-major-review-into-hgv-driver-training) (<https://www.gov.uk/government/news/government-announces-major-review-into-hgv-driver-training>), has been completed and has been informed by involvement of stakeholders and substantial surveys.

The review has considered how the DCPC process can be updated to reduce the burden on drivers – both returning and new – and to ensure it does not act as a barrier to working in the sector. This could, amongst other things, include amending the scope of which types of driving should attract the requirement to hold a DCPC qualification and which types of driving should be exempted.

Currently, exemptions from the need to hold a DCPC qualification exist for some of the following reasons.

Where the vehicle is being used for:

- non-commercial carriage of passengers or goods
- carrying material or equipment used in the driver's job, as long as driving is less than 30% of the driver's rolling monthly work
- driving for someone a driver works for, or his own agriculture, horticulture, forestry, farming or fisheries business, as long as driving is less than 30% of his rolling monthly work

- driving within 62 miles (100 kilometres) of a driver's base – but the vehicle cannot be carrying passengers or goods, and driving a lorry, bus or coach cannot be the driver's main job
- driving to or from pre-booked appointments at official vehicle testing centres
- driving lessons for anyone who wants to get a driving licence or a DCPC
- maintaining public order – and the vehicle is being used or controlled by a local authority
- rescue missions or in states of emergency

Or where the vehicle is:

- is being road tested for repair, maintenance or technical development purposes
- either new or rebuilt and has not yet been taxed
- being used or controlled by the armed forces, police, fire and rescue service, emergency ambulance service, prison service or people running a prison or young offender institution
- limited to a top speed of 28 miles per hour

These exemptions are limited and relate to some people who are not professional lorry, bus or coach drivers.

You can [find out more information about DCPC exemptions \(https://www.gov.uk/guidance/driver-cpc-exemptions-examples\)](https://www.gov.uk/guidance/driver-cpc-exemptions-examples).

Any future changes to the DCPC regime are likely to be implemented using different legislation and at a different time to any driving licence changes proposed here.

D1 minibus entitlement

To grant those drivers who have a car (category B) licence entitlement to a minibus (category D1) licence.

Background to D1 and D1 (101) licences

Like C1 vehicles, the D1 category was first derived from the 1968 Vienna Convention on Road Traffic. The contracting parties agreed that the skills to handle a medium-sized vehicle were distinct enough to warrant a separate sub-category within category D.

The UK did not ratify the Vienna Convention until 2018, but the licences categories were adopted into domestic law through implementation of the EU Driving Licence Directives, namely the EU Second Driving Licence Directive (Directive 91/439/EEC), and more recently the EU Third Driving Licence Directive (Directive 2006/126/EC).

A vehicle that can be driven on a D1 category driving licence must have [no more than 16 passenger seats, a maximum length of 8 metres and a trailer up to 750kg](https://www.gov.uk/driving-licence-categories#minibuses) (<https://www.gov.uk/driving-licence-categories#minibuses>). A D1 licence is required where a minibus is being driven on a commercial basis for payment.

Drivers who passed a category B test before 1 January 1997 were automatically granted category D1 (not for hire or reward) entitlement. This is shown as code D1 (101) on the licence and enables the licence holder to drive a minibus provided the vehicle is not operated for 'hire or reward'. This remains on the licence until it expires, which is normally at age 70 but can be sooner. Renewal of the entitlement is subject to submission of a medical report and the higher health standards for D1 and other group 2 vehicles.

The automatic grant of D1 (101) entitlement ceased on 1 January 1997 as a result of the second Driving Licence Directive.

This meant that drivers who obtained their category B car licence from 1 January 1997 onwards no longer received the D1 (101) entitlement. However, drivers who passed a category B car driving test prior to 1 January 1997 retained the D1 (101) code on their driving licence under 'grandfather rights'.

Today, a minibus can be driven under clearly defined conditions by drivers who hold a category B car licence but who have not passed a D1 driving test (regulation 7(6) of the Motor Vehicles (Driving Licences) Regulations 1999).

There are different stipulations for driving a minibus under a category B licence, category D1 (101) and a category D1 licence, in addition to testing requirements for obtaining category B and category D1 licences.

Testing requirements

B licence

Minimum age: 17

Test: Must pass theory and practical. Practical driving test cannot include motorways.

Medical requirements: Self-declaration of any relevant medical conditions.

B licence with D1 (101) entitlement

Minimum age: N/A

Test: As for B licence.

Medical requirements: As for B licence.

D1 licence

Minimum age: 18 (military 17).

Test: Pass the DVSA PCV Part 1a Theory and Part 1b hazard Perception examinations. Pass the DVSA PCV Part 3 D1 Practical Driving examination. Driver certificate of professional competence (DCPC) if driving for commercial purposes.

Medical requirements: Must submit a D4 medical report with their initial licence application. Military are exempt from the initial requirement.

Requirements and stipulations to drive a minibus under this licence

B licence

Minimum age: 21

Vehicle restrictions: Maximum weight of the minibus is not more than 3.5 tonnes or 4.25 tonnes, including specialist equipment. May drive minibuses of 8 to 16 passenger seats. Must not tow a trailer.

Additional licence stipulations: Must have held the licence for at least 2 years.

Driver payment stipulations: Driver must be driving on a voluntary basis.

Stipulations around purpose of journey: Minibus is used for social purposes by a non-commercial body. Can drive a category D1 vehicle on a not for hire and reward basis unless driving a vehicle under S19 or S22 permit, in which case it may be on a for hire or reward basis.

Licence renewal requirements: If over 70, drivers must be sure they meet the higher D1 health requirements.

B licence with D1 (101) entitlement

Minimum age: N/A

Vehicle restrictions: 8 to 16 seats. No vehicle weight or length limit. Can tow a trailer up to 750kg.

Additional licence stipulations: N/A

Driver payment stipulations: Driver can receive payment.

Stipulations around purpose of journey: Can drive a category D1 vehicle on a not for hire and reward basis unless driving a vehicle under S19 or S22 permit, in which case it may be on a for hire or reward basis. There may be circumstances in which a driver needs a driver certificate of professional competence (DCPC). Modules 2 and 4 initially or 35 hours of periodic training. Renew every 5 years (35 hours training).

Licence renewal requirements: At licence expiry (normally age 70), the driver must apply to renew the entitlement, submit a D4 medical report with their licence application and be assessed as meeting the higher D1 health requirements.

D1 licence

Minimum age: 18

Vehicle restrictions: No more than 16 passenger seats. A maximum length of 8 metres. A trailer up to 750kg. Additional licence stipulations: Must meet conduct requirements, not just for road traffic offences but other convictions relevant to wider public safety.

Driver payment stipulations: Driver can receive payment.

Stipulations around purpose of journey: No restrictions. Driver certificate of professional competence (DCPC) if driving for commercial purposes. Renew every 5 years (35 hours training).

Licence renewal requirements: From age 45 must be renewed every five years and then annually from age 65 with a D4 medical report.

D1 minibus driver licensing and driver shortages

There have also been challenges in the recruitment and retention of bus and coach drivers who hold full D licences.

Home to school transport providers who often use minibuses have reported driver shortages and an increased number of operators having to turn down contracts or increase prices for this reason.

Changes to category D1 that allowed drivers to enter the minibus industry more easily may allow local authorities to meet their statutory obligations around home to school travel. They may also decrease costs incurred, as well as widen the pool of drivers for other minibus markets, plus increase consumer choice.

If a minibus is being driven for commercial purposes, the driver is required to have undertaken certain DCPC modules. A policy review has been conducted into DCPC and recommendations will be published soon.

Drivers operating a vehicle under a section 19 or section 22 (community transport) permit who have a D1 (101) can drive for hire or reward and can also be paid (as an employee) for driving. Sections 19 and 22 of the Transport Act 1985 provide for a vehicle to be operated for hire or reward on a not-for-profit basis with a permit rather than a standard operator licence. The conditions attached to a permit differ from those of an operator licence.

Since the change in legislation in 1997, drivers who passed a category B test may only drive community transport minibuses in certain circumstances (regulation 7(6) of the 1999 regulations). These notably include weight restrictions on the minibus and stricter limits on the use of the vehicle. They are also not allowed to be paid for this driving.

To obtain a category D1 driving licence, drivers are required to be at least 18 years old and have a category B licence. The next step is to pass a medical check before making an application for a category D1 provisional licence. Once a driver has

passed a medical check they are then required to pass the PCV theory test. Upon passing the theory test, they may then sit the PCV practical test. A D1 licence enables a driver to drive for hire and reward.

Without a category D1 entitlement, a vehicle can be driven under a section 19 or 22 permit with just a category B (car) licence, but under limited circumstances. The legislative 'net-effect' of the 1999 regulations means that a category B licence holder must be a 'volunteer driver' to drive a minibus under a section 19 or 22 permit, without category D1 entitlement.

The table below shows the number of category D1 licences, category D licences and category B licences for the 17 to 41 age cohort in 2022. D licences give drivers the right to drive a conventional bus, whereas D1 licences give drivers the right to drive a minibus.

	D1 licences	D licences	B licences
Women aged 17-41	5,810	5,240	6,238,631
Men aged 17-41	71,726	64,664	7,124,122
Total people aged 17-41	77,536	69,904	13,362,753

Source: [GB Driving Licence Data \(https://data.gov.uk/dataset/d0be1ed2-9907-4ec4-b552-c048f6aec16a/gb-driving-licence-data\)](https://data.gov.uk/dataset/d0be1ed2-9907-4ec4-b552-c048f6aec16a/gb-driving-licence-data)

Most drivers in the 42 to 70 age cohort, being those who generally obtained a category B licence prior to 1 January 1997, will have category D1 (101) entitlement. This suggests the potential pool of drivers for the permit-holding community transport sector to draw from is contracting, as the number of drivers approaching 70 each year is not offset by the number of drivers in younger cohorts attaining a category D1 licence. However, we are unable to estimate how many drivers with pre-1997 category D1 entitlement use it or intend to use it. For instance, the supply of minibus drivers may be decreasing due to the demand for minibuses also falling.

A portion of the minibus-driving workforce, both paid and volunteer, has been drawn from the demographic who passed their driving test prior to 1997 and therefore hold the automatically-conferred D1 (101) entitlement.

Road safety implications

Top 10 category D1 test driving faults

The top 10 reasons why individuals currently fail their category D1 test (which account for 69% of failures) are shown in the table below.

	Manoeuvre	Average percentage of serious and dangerous faults
1	Reverse left - control	15%
2	Move off - safely	10%
3	Junctions - observation	8%
4	Mirror - change direction	8%
5	Use of speed	6%
6	Response to signs - road markings	5%
7	Junctions - turning right	5%
8	Response to signs - traffic lights	5%
9	Response to signs - traffic signs	4%
10	Positioning - normal driving	3%

The removal of a test could see further individuals driving category D1 vehicles with little or no experience. As 30% of drivers fail the test, there is a risk that removal of the test requirements may increase the accident rates.

Given there could be road safety impacts, we are seeking balanced views as to whether any changes to the category D1 licence regime could be made in a positive way to help industry but without detrimental impacts on road safety.

Changes to raise the standards of HGV instruction and improve pass rates

To create a formalised instructor programme or training and how this could be made compulsory, to create a formal register of instructors and to publish pass rates for instructors.

Following the increase in driver testing provision, the limitations affecting the training industry's capacity to train and employ more instructors has been suggested as a bottleneck or barrier to increasing new entrants to the HGV driver industry.

Introducing a compulsory training programme and register could raise the standards of instruction and consequently improve test pass rates. We believe it would help professionalise and raise the profile of the HGV instructor industry, which could attract greater numbers of individuals seeing this as a viable career choice.

Conversely, some instructors may consider this an additional burden and consider a career change, which could reduce the number of instructors. This call for evidence seeks to find views on whether the introduction of a register of instructors would be considered a benefit or burden to the training industry.

Your views and responses will help the department (and its executive agency, the Driver and Vehicle Standards Agency (DVSA)) to determine what next steps might look like and reach a decision on those in a balanced and informed way, which is proportionate and has benefit to the instructor industry.

Smaller scale benefits for the industry

To permit a person who has held a HGV (category C) licence for 2 years to drive PCVs for maintenance and repair purposes.

Until 29 December 2014, regulation 7(1) of the 1999 regulations permitted a person who had held, for a period of at least 2 years, a relevant full licence authorising the driving of vehicles included in category C (other than vehicles included in sub-category C1) to also drive a motor vehicle of a class included in category D which was:

- (a) damaged or defective and being driven to a place of repair or being road tested following repair
- (b) not used for the carriage of any person who is not connected with its repair or road testing

Regulation 7(1) of the 1999 regulations was revoked owing to its incompatibility with the EU Third Driving Licence Directive and no 'grandfather right' was put in place.

It could be considered that now the UK has left the European Union we may wish to return to the pre-2015 position and restore these rights so that mechanics do not need to take an additional driving test (category D) to carry out this element of their role.

We need to consider whether this would compromise road safety, but recognise that the buses or coaches would be driven in very limited circumstances without passengers. We also must consider the scale of any international impact, but as the change is very slight it would affect in real terms only a handful of drivers.

To reintroduce the automatic granting of category D1E entitlement when category C1, C1E and D1 entitlements have been granted, to align with the equivalent existing granting of category DE when category C, CE and D entitlements have been granted, without having to pass a further specific category D1E test.

Category D1E was granted as an additional entitlement automatically in those circumstances up until 2012, when the EU Third Driving Licence Directive prohibited it – although the actual entitlement was not removed until 2014.

By completing 3 of the 4 tests in the higher category of vehicles (group 2 vehicles), there was no reason to believe that a driver could not safely tow a trailer behind a bus if they could safely tow a trailer behind a HGV and we believe the same should apply to the group 2 subcategories of vehicles.

It could be considered that now the UK has left the European Union, we may wish to return to the pre-2012 position and restore this entitlement so that additional tests are not required.

To revoke all category L licences and category L entitlements, as this is no longer an extant category and ensures that those driving electric vehicles follow the relevant test and training procedure for cars and larger vehicles.

Prior to 1 January 1997, drivers who obtained a category B car licence were automatically granted category L entitlement, which allowed them to drive electrically propelled vehicles.

Since 1 January 1997, category L is no longer issued, and drivers are now required to hold a category B licence to drive most vehicles that category L was intended to cover.

When this right was originally derived from the 1949 Geneva Convention on Road Traffic, it was envisaged that these electric vehicles would consist of light vans and perhaps most commonly to the UK, milk floats.

Although category L has not been issued for some time, there are still people with 'L' on their driving licences from grandfather rights, as well as a few people (around 1000) who have only taken a driving test in a category L vehicle.

Recent advances in technology have seen electric-powered HGVs and PCVs enter the market, with many more companies planning to manufacture more to replace the polluting diesel models.

Currently, there is no driver licensing legislation that covers electric-powered HGVs and PCVs specifically. These are dealt with under the same legislation as fossil fuel powered vehicles of the equivalent class, but the existing category L licences and category L entitlements have the potential to cause confusion.

We are seeking views on whether the category L should be revoked in its entirety to ensure anyone driving an electric vehicle meets the requirements of whatever driving licence category is appropriate to the size of vehicle they wish to drive.

To align category F (agricultural and forestry tractors) and category H (tracked vehicles) with haulage tractors and require a category C licence, rather than category F licence, for their use and to investigate whether some agricultural tractor tests need to be brought into line with modern practices.

There are some concerns that people using the category F driving licence (which is granted concurrently with a category B licence) are taking unfair advantage of the rules to drive very large tractors with very heavy loads. It is believed this is not in the spirit of the legislation. Category F is to help farmers and other agricultural and forestry workers drive short distances with heavy equipment for off-road work.

When larger tractors are used on the road for longer periods towing heavy loads, some stakeholders maintain that this should fall into the category C regime, and not the category F regime.

Agricultural tractor practical driving tests and some other domestic categories such as tanks, tracked vehicles and stream rollers are conducted under arrangements that have been in place for many decades. The test is conducted with the examiner on foot observing the driver as he or she drives around a predetermined route.

With the advances in technology, vehicle types and the shift in emissions and load carrying capacity, we believe it is time to review the way this testing (and the associated training) is carried out. We are seeking views on whether consideration of changes to the current regime is appropriate.

Annex A: Driving licence categories

Mopeds

Category AM

You may drive 2-wheeled or 3-wheeled vehicles with a maximum design speed of over 25km/h (15.5mph) but not more than 45km/h (28mph).

This category also includes light quad bikes with:

- unladen mass of not more than 350kg (not including batteries if it's an electric vehicle)
- maximum design speed of over 25km/h (15.5mph) but not more than 45km/h (28mph)

Category P

You may drive 2-wheeled vehicles with a maximum design speed of over 45km/h (28mph) but not more than 50km/h (31mph).

Its engine size must not be more than 50cc if powered by an internal combustion engine.

This category was discontinued from 20 January 2013.

Category Q

You may drive 2-wheeled and 3-wheeled vehicles without pedals with:

- an engine size not more than 50cc if powered by an internal combustion engine
- a maximum design speed of no more than 25km/h (15.5mph)

This category also includes trial e-scooters.

Motorcycles

Category A1

You may drive light motorbikes with:

- an engine size up to 125cc
- a power output of up to 11kW
- a power to weight ratio not more than 0.1kW/kg

This category also includes motor tricycles with power output up to 15kW.

Category A2

You may drive motorbikes with a:

- power output up to 35kW
- power to weight ratio not more than 0.2kW/kg

The motorbike must also not be derived from a vehicle of more than double its power.

You may also drive motorbikes in category A1.

Category A

You may drive:

- motorbikes with a power output more than 35kW or a power to weight ratio more than 0.2kW/kg

- motor tricycles with a power output more than 15kW

You may also drive motorbikes in categories A1 and A2.

Light vehicles and quad bikes

Category B1

You may drive motor vehicles with 4 wheels up to 400kg unladen or 550kg if they're designed for carrying goods.

Cars

Category B

If you passed your test before 1 January 1997, you're usually allowed to drive a vehicle up to 3,500kg and a vehicle and trailer combination up to 8,250kg MAM.

[View your driving licence information \(https://www.gov.uk/view-driving-licence\)](https://www.gov.uk/view-driving-licence) to check.

You're also allowed to drive a minibus with a trailer over 750kg MAM.

If you passed your test on or after 1 January 1997, you may drive vehicles up to 3,500kg MAM with up to 8 passenger seats (with a trailer up to 750kg).

You may also tow heavier trailers if the total MAM of the vehicle and trailer is not more than 3,500kg.

You may drive motor tricycles with a power output higher than 15kW if you are over 21 years old.

Physically disabled drivers with provisional category B entitlement will also have provisional entitlement to ride category A1 or A motor tricycles.

Non-disabled drivers can no longer ride motor tricycles with a provisional category B licence.

Category B auto

You may drive a category B vehicle - but only one with an automatic gearbox.

Category BE

You may drive a vehicle with a MAM of 3,500kg with a trailer.

The size of the trailer depends on the BE "valid from" date shown on your licence. If the date is:

- before 19 January 2013, you can tow any size trailer within the towing limits of the vehicle
- on or after 19 January 2013, you can tow a trailer with a MAM of up to 3,500kg within the towing limits of the vehicle

Medium-sized vehicles

Category C1

You may drive vehicles between 3,500 and 7,500kg MAM (with a trailer up to 750kg).

Category C1E

You may drive category C1 vehicles with a trailer over 750kg.

The combined MAM of both cannot exceed 12,000kg.

Large vehicles

Category C

You may drive vehicles over 3,500kg (with a trailer up to 750kg MAM).

Category CE

You may drive category C vehicles with a trailer over 750kg.

Minibuses

Category D1

You may drive vehicles with:

- no more than 16 passenger seats
- a maximum length of 8 metres
- a trailer up to 750kg

Category D1E

You may drive category D1 vehicles with a trailer over 750kg MAM. The combined MAM of both cannot exceed 12,000kg.

Additional grandfather categories

C1E (8.25 tonnes)

Medium-sized vehicles between 3.5 tonnes and 7.5 tonnes, plus a trailer of a MAM of up to 750kg, which amounts to a combined total of 8.25 tonnes.

D1 (101)

A restricted form of category D1, which permits driving a minibus (between 8 and 16 passenger seats) without a weight limit on a 'not for hire or reward' basis.

Annex B: Full list of call for evidence questions

This is an overview of the questions you will be asked in the [survey](https://www.smartsurvey.co.uk/s/OF07U7/) (<https://www.smartsurvey.co.uk/s/OF07U7/>).

1. Should, in your view, C1 entitlement be given to people at the same time as they pass their car (category B) test?
2. Should, in your view, there be an age restriction to being granted the C1 entitlement?
3. Should, in your view, there be a minimum period of time that the driver should hold the car licence before being allowed to drive a C1 vehicle?
4. In your view, should drivers be required to pass the heavy goods vehicle (HGV) medical to gain the C1 entitlement?
5. Do you think there are specific purposes of driving of C1 vehicles that should be exempted from DCPC for driving in the UK?
6. Do you think there are specific groups of drivers of C1 vehicles that should be exempted from DCPC for driving in the UK?
7. If C1 were removed from DCPC should, in your view, alternative requirements (for example training or qualifications) be mandated?
8. What alternative training requirements do you suggest and why?
9. Would you support the removal of the requirement to obtain a D1 licence test to drive a minibus?
10. What additional stipulations would you recommend?
 - A mandatory requirement to undertake additional training such as MiDAS
 - A minimum age requirement (above that of a B licence)
 - Compulsory medical requirements
 - Compulsory conduct requirements

- Renewal requirement (with medical and conduct requirements)
- Another stipulation or stipulations:

11. Would you support these 'additional stipulations' applying to individuals:

- when driving a vehicle under a section 19 or 22 permit?
- when driving a vehicle under a PSV 'O' Licence?
- at other times when driving a minibus?

12. What are your main concerns for not supporting a removal of the requirement?

- Safety
- Poor driver skills
- Another reason:

13. Supply any views and evidence you have on whether this change would have a negative or positive impact upon road safety.

14. In your view, if the requirement to obtain a D1 licence to drive a minibus were to be removed, what impact do you think this would have on the supply of minibus drivers?

- Significant increase in supply
- Increase in supply
- No effect
- Reduction in supply
- Significant reduction in supply

15. What effect do you think the removal of the D1 licence requirement would have on the cost of running taxis and PHVs?

16. In your view, what impact would the removal of the D1 licence requirement have on:

- bus drivers?
- coach drivers?
- PHV drivers?
- minibus drivers?

17. Do you agree with the introduction of a standardised instructor training and qualification programme?

18. This should, in your view, be:

- voluntary?
- mandatory?

19. Should, in your view, there be a mandatory register of HGV instructors managed by the Driver and Vehicle Standards Agency?

20. If the instructor register was introduced, in your view, should it include:

- public service vehicles? *passenger carrying vehicles (PCVs)?

21. Do you agree with the publication of pass rates achieved by instructors?

22. Do you agree that entitlement should be changed to allow persons with category C entitlement to drive PCVs on their HGV licence for maintenance and repair purposes?

23. What, in your view, would be the estimated costs or savings to you or your business would be if this was to be permitted and why?

24. Supply any views and evidence you have on if this change would have a negative or positive impact upon road safety.

25. Do you agree that the D1E entitlement should be granted to those drivers who hold:

- C1 licences without taking an additional test?
- C1E licences without taking an additional test?
- D1 licences without taking an additional test?

26. What, in your view, would be the estimated costs or savings to you or your business would be if this was to be permitted and why?

27. Supply any views and evidence you have on if this change would have a negative or positive impact upon road safety.

28. Are you dependent on the category L entitlement?

29. Explain how you are dependent.

30. In your view what, if any, financial implications are there to:

- you in revoking the L category licences and why?
- business in revoking the L category licences and why?

31. In your view are there any road safety impacts to revoking these L category licences?

32. What road safety issues and why?

33. Do you believe the L category licence should be:

- revoked?
- maintained?

34. Why?

35. In your view should we consider changes to legislation to bring agricultural vehicles within the:

- C category?
- CE category?

36. Supply any evidence or comments regarding the 2012 driving licence regulations.

37. What, if any, other driving licence issues do you think should be explored for improvement?

38. Do you provide minibus services?

39. How many minibuses do you use to provide transport services?

40. How many of the following do you use and what proportion of the journeys you operate does this constitute?

Number of permits and licences you have:

- Section 19 permit
- Section 22 permit
- PSV operator licence

Number of drivers utilising a D1 licence to provide services under such permits and licences:

- Section 19 permit
- Section 22 permit
- PSV operator licence

Number of drivers utilising a D1(101) licence to provide services under such permits and licences:

- Section 19 permit
- Section 22 permit
- PSV operator licence

Number of drivers utilising a B licence to provide services under these permits and licences:

- Section 19 permit
- Section 22 permit
- PSV operator licence

Number of drivers utilising a D licence to provide services under these permits and licences:

- Section 19 permit
- Section 22 permit
- PSV operator licence

41. What percentage of your organisation's journeys do you operate using a:
B licence and this permit or licence?

- Section 19 permit
- Section 22 permit
- PSV operator licence

D licence and this permit or licence?

- Section 19 permit
- Section 22 permit
- PSV operator licence

D1 licence and this permit or licence?

- Section 19 permit
- Section 22 permit
- PSV operator licence

D1 (101) entitlement and this permit or licence?

- Section 19 permit
- Section 22 permit
- PSV operator licence

42. Do you currently offer services and/or want to offer services within the areas listed below?

Community transport (services operated on an S19 and S22 if not covered below)

- Currently operate minibuses

- Wish to operate minibuses in future

Home to school and educational services

- Currently operate minibuses
- Wish to operate minibuses in future

Tourism and excursions

- Currently operate minibuses
- Wish to operate minibuses in future

Contracted support for emergency or military services

- Currently operate minibuses
- Wish to operate minibuses in future

Staff shuttle or airport transfer

- Currently operate minibuses
- Wish to operate minibuses in future

Sports teams and spectators

- Currently operate minibuses
- Wish to operate minibuses in future

Demand responsive transport (flexible including flexible services offered on a section 22 permit but not falling under above categories)

- Currently operate minibuses
- Wish to operate minibuses in future

43. The average annual mileage, to the nearest mile, of a minibus is:

- 0 miles?
- 1 to up to 2,000 miles?
- 2,000 up to 5,000 miles?
- 5,000 up to 10,000 miles?
- 10,000 up to 20,000 miles?
- above 20,000 miles?

44. You operate minibus services within:

- urban areas only?
- rural areas only?
- more urban areas than rural areas?
- more rural areas than urban areas?
- an equal amount of urban and rural areas?

45. How many:

- volunteer transport drivers do you have in total?
- drivers do you pay to perform transport services?

46. How many of your voluntary drivers are aged:

- between 21-30?
- between 31-44?
- between 45-59?
- between 60-69?
- aged 70 or over?
- unsure

47. How many volunteer drivers are:

- retired?
- have a primary occupation as a public sector PSV driver in addition to delivering community transport services?
- have a primary occupation as a private sector PSV driver in addition to delivering community transport services?
- have a primary occupation as a third sector PSV driver in addition to delivering community transport services?
- have a primary occupation which is unrelated to passenger transport?
- undertake non-paid work for other organisations?
- have an unknown status?

48. How many of your paid transport drivers are:

- between 18-20?
- between 21-30?
- between 31-44?

- between 45-59?
- between 60-79?
- aged 70 or over?
- ages unknown?

49. How many of your paid drivers:

- are retired from their primary occupation?
- have a primary occupation as a public sector PSV driver in addition to performing community transport services?
- have a primary occupation as a private sector PSV driver in addition to performing community transport services?
- have a primary occupation as a third sector PSV driver in addition to performing community transport services?
- have a primary occupation which is unrelated to passenger transport?
- undertake non-paid work for other organisations?
- have an unknown status?

50. How many of your drivers have:

- undertaken the Minibus Drivers Awareness Scheme MiDAS, financed by your organisation?
- undertaken MiDAS, financed by another transport organisation?
- undertaken MiDAS, financed by themselves?
- undertaken MiDAS, financed by more than one individual or organisation?
- not undertaken MiDAS?
- undertaken the Driver's Certificate of Professional Competence (DCPC) qualification?
- other advanced driver or minibus training?

51. Approximately how many services do you run per month?

52. Are you able to provide enough services to meet demand?

53. If not able to provide enough services to meet demand, is this due to:

- cost of fuel?
- availability of vehicles?
- shortages of drivers?

- other reason – please state (less than 50 words)

54. Have you previously had to cancel any services (including short term and temporary cancellations)?

- Yes
- No

55. What percentage (%) of services have you had to cancel in the last year?

56. Do you believe there have been driver shortages within the minibus sector?

57. In your opinion how much impact have the factors listed below had on the minibus sector driver shortages?

Reluctance to take a D1 test due to either the cost or time it takes to go through the testing process

- Very significant impact
- Significant impact
- Some impact
- Minor impact
- No impact

Processes required for retaining the licence (regular renewal, medical and conduct requirements)

- Very significant impact
- Significant impact
- Some impact
- Minor impact
- No impact

Pay

- Very significant impact
- Significant impact
- Some impact
- Minor impact
- No impact

Working conditions

- Very significant impact
- Significant impact
- Some impact
- Minor impact
- No impact

A general increase in demand for labour

- Very significant impact
- Significant impact
- Some impact
- Minor impact
- No impact

Vehicle weight limit

- Very significant impact
- Significant impact
- Some impact
- Minor impact
- No impact

Driver age limitation

- Very significant impact
- Significant impact
- Some impact
- Minor impact
- No impact

Other reason or reasons

- Very significant impact
- Significant impact
- Some impact
- Minor impact
- No impact

Other: please specify (50 words or fewer)

58. In your view for how long have industry driver shortages been an issue?

- Driver shortages have not been an issue
- One year or less
- Between one and up to two years
- Between two years and three years
- 3 years or more

59. Do you expect to have a shortage of minibus sector drivers in the future?

- Yes, in the next 0 to 2 years
- Yes, between 2 to 5 years
- Yes, after 5 years
- Unsure
- No, I expect no driver shortages

60. Explain the reasons for your anticipation of future driver shortages.

61. Share any views or evidence you have regarding minibus safety.

Consultation principles

The call for evidence is being conducted in line with the government's [key consultation principles \(https://www.gov.uk/government/publications/consultation-principles-guidance\)](https://www.gov.uk/government/publications/consultation-principles-guidance).

If you have any comments about the call for evidence process, please contact:

Licensing CfE Coordinator,
Department for Transport
RPE Area, 3rd Floor, Great Minster House
London SW1P 4DR
Email licensing.consultation@dft.gov.uk

Glossary of terms

hire or reward

Any payment, in cash or kind, that gives a person the right to be carried on the vehicle, regardless of whether or not that right is exercised. Hire or reward takes place if the journey is organised in a way that goes beyond the bounds of mere

social kindness. This legal term was introduced as part of the Public Passenger Vehicles Act 1981.

community transport

Flexible and accessible community-led solutions to unmet local transport needs. These operations often represent the only means of transport for many vulnerable and isolated people, often older people or people with disabilities.

section 19 permit and section 22 permit

These are the 2 types of permits issued under the Transport Act 1985, and they are integral to the function of the British community transport sector. A permit may be granted to an organisation if they operate on a not-for-profit basis and fulfil other requirements. For example, that the purpose of the journey is non-commercial, the journey is of a short distance or the main occupation of the driver is not driving. These permits are in lieu of a commercial operator's licence and allow the vehicle to be driven on a for hire or reward basis.

Section 19 permits cannot be used to carry members of the public, whereas section 22 permits, issued to bodies concerned for the social and welfare needs of one or more communities, can.

The permit disc must be displayed in the vehicle to show it is being used. Permits are not specific to one vehicle, so the holder of the permit can transfer it between different vehicles, but a permit can only be used on one vehicle at a time. An organisation can hold more than one permit, but never both types on the same vehicle operating at the same time.

volunteer driver

Someone who is not paid nor obligated to drive. The driver would not be viewed as a voluntary driver if they were contracted to drive or driving forms part of their contract of work. This definition is not in law but exists as an intuitive definition amongst different pieces of government guidance. For example, in [Section 19 and 22 permits and obligations: not for profit passenger transport](https://www.gov.uk/government/publications/section-19-and-22-permits-not-for-profit-passenger-transport/section-19-and-22-permits-not-for-profit-passenger-transport) (<https://www.gov.uk/government/publications/section-19-and-22-permits-not-for-profit-passenger-transport/section-19-and-22-permits-not-for-profit-passenger-transport>).

DCPC

A driver certificate of professional competence, which is a professional qualification required for drivers of lorries, buses, minibuses or coaches engaged in the commercial carriage of goods or passengers.

PCV

Passenger carrying vehicle, the term most commonly used currently when referring to a vehicle used for carrying passengers for hire or reward which is constructed or adapted to carry more than 8 passengers. This includes buses, coaches and

minibuses.

PSV

Public service vehicle, a term previously used to describe a passenger carrying vehicle. Operator licences refer to PSVs.

MIDAS

Minibus driver awareness scheme. A nationally-recognised standard for the assessment and training of minibus drivers, administered by the Community Transport Association and Hampshire County Council.

operator licence

In order to operate heavy goods vehicles or vehicles designed or adapted to carry 9 or more passengers for hire or reward, operators are required to have an operator licence. These require the completion of several steps, including designating operating centres and a transport manager. Inquiries into the conduct of operators are undertaken by the traffic commissioners.

operator

If the individual owns a vehicle, the driver is the operator. In any other instance, the person for whom the driver works (whether under a contract of employment or any other description of contract personally to do work) is the operator. Where a vehicle is the subject of an agreement for hire, hire purchase, conditional sale or loan, the owner is the person in possession of the vehicle under that agreement.

Freedom of information

Information provided in response to this call for evidence 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 2018 (DPA) and UK GDPR 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 (DfT) is carrying out this call for evidence to understand, now that we have left the European Union, what opportunities may be available to exploit within the driving licence regime, whilst ensuring that road safety is not impacted detrimentally.

In this call for evidence, we are asking for your name and email address, in case we need to contact you about your responses. You do not have to give us this personal information, but if you do provide it, we will use it only for the purpose of asking follow-up questions.

For organisations, we are in addition asking for a brief description of your organisation to better understand the relationship between your organisation's work and the topic.

This call for evidence 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, the department will, under data protection law, be the controller for this information.

If responding to this call for evidence online, your personal data will be processed on behalf of the department by SmartSurvey, which runs the survey collection software.

Your name and email address will not be shared with any other third parties, but your responses and evidence may be shared with a third party for the purposes of analysis.

We will not use your name or other personal details that could identify you when we report the results of the call for evidence. Any information you provide will be kept securely and destroyed within 12 months of the closing date. Any information provided through the online questionnaire will be moved to our internal systems within 2 months of the call for evidence period end date.

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