

# Driver Certificate of Professional Competence (DCPC) changes

## Introduction

Thank you for responding to our consultation on alterations to the Driver Certificate of Professional Competence (DCPC).

Closing date is 27 April 2023.

## View all the questions

This survey provides questions based on user choice, a [full copy of the questions is available \[opens in a new window\]](#).

## Print or save a copy of your response

At the end, you may either print or save a copy of your response for your records after pressing 'Submit your response'.

## Save and continue option

You may 'save and continue' anytime. If you do you will be sent a link via email to allow you to continue your response where you left off provided you enter your correct email address a mistake in the email address means you won't get the link.

## Accessibility statement

Read our [accessibility statement for SmartSurvey forms \(opens in a new window\)](#).

## Confidentiality and data protection

The Department for Transport (DfT) is carrying out this consultation on alterations to the Driver Certificate of Professional Competence (DCPC) qualification. Our [DfT online form and survey privacy notice \[opens in a new window\]](#) gives more information on how your personal data is processed in relation to this survey.

In addition to the information outlined in the privacy notice, for individuals and organisations we are asking for further information to ascertain your relationship with this topic.

### 1. Your (used for contact purposes only):

name:   
email address:

### 2. You are responding: \*

- as an individual?  
 on behalf of an organisation? (Go to 'Organisation details: question 17')

# Profession

For the purposes of this consultation we define a:

- 'professional driver' as someone whose current principal work activity involves the driving of vehicles. Generally, driving is deemed not to be a driver's principal activity where it occupies less than 30% of their monthly working time
- 'Driver Certificate of Professional Competence (DCPC) trainer' as someone who leads DCPC training

## 3. You:

- were previously a professional driver?
- are a professional driver?
- are a Driver Certificate of Professional Competence trainer? (Go to 'Proposals for change')
- are another type of individual? (Go to 'Proposals for change')

# Driving licence

[Driving licence categories \[opens in a new window\]](#) allow the driving of different vehicles. The categories for:

- large vehicles are:
  - C, which entitles driving of vehicles over 3500kg (with a trailer up to 750 kilograms (kg))
  - CE, which entitles driving of 'C' category vehicles but with a trailer over 750kg
- medium-sized vehicles are:
  - C1, which entitles driving of vehicles between 3,500kg and 7,500kg (with a trailer up to 750kg)
  - C1E, which entitles driving of 'C1' category vehicles but with a trailer over 750kg (combined must not exceed 12,000kg)
- buses are:
  - D, which entitles driving of any bus with more than 8 passenger seats (with a trailer up to 750kg)
  - DE, 'D' category vehicles with a trailer over 750kg
- minibuses are:
  - D1, which entitles driving of a vehicle with no more than 16 passenger seats, a maximum length of 8 metres and a trailer up to 750kg

- D1E, 'D1' category vehicles but with a trailer over 750kg (combined must not exceed 12,000kg)

#### 4. Do you hold any of these licences?

- Yes, I currently do
- I used to
- No (Go to 'Proposals for change')
- Don't know (Go to 'DCPC qualification: question 6')

## Licences held

#### 5. You:

- have a C driving licence (including CE, C1, C1E) and D driving licence (including DE, D1, D1E)?
- have a C driving licence (including CE, C1, C1E) only?
- have a D driving licence (including DE, D1, D1E) only?
- held a C driving licence (including CE, C1, C1E) and D driving licence (including DE, D1, D1E)?
- held a C driving licence (including CE, C1, C1E) only?
- held a D driving licence (including DE, D1, D1E) only?

## DCPC qualification

#### 6. You:

- have held a DCPC qualification and let it lapse? (Go to 'DCPC rejoining: question 9')
- currently hold a DCPC qualification?
- have not held a DCPC because you don't need one? (Go to 'Proposals for change')

## DCPC renewal

#### 7. You are currently:

- looking to renew your DCPC when it expires? (Go to 'Driver training cost: question 10')
- not looking to renew your DCPC?

not sure about whether to renew your DCPC or not?

## DCPC reasoning

8. Why?

[After answering go to 'Driver training cost: question 11']

## DCPC rejoining

9. You are currently:

- looking to return to driving for which a DCPC is required? (Go to 'Proposals for change')
- not looking to return to driving for which a DCPC is required?
- not sure about whether to return to driving for which a DCPC is required or not?

## DCPC rejoining reasoning

10. Why?

[After answering go to 'Proposals for change']

## Driver training cost

11. Do you currently as a driver cover the cost of periodic DCPC training courses?

- Yes in full
- Yes partly
- No

**12. You:**

- cover your own travel costs to and from training course locations for yourself?
- do not cover your own travel costs to and from training course locations for yourself? (Go to 'Time: question 15')

## Money

**13. How many days, on average, do you travel to training course locations per 35-hour training cycle?**

- 1 day
- 2 days
- 3 days
- 4 days
- 5 days
- Above 5 days:

**14. Approximately how much money does it cost you in whole pounds, to travel to and from training course locations, on average per day (including the average cost of fuel, public transport or any other costs that apply)?**

- I don't know
- £0
- £0.01 to £5
- £5.01 to £10
- £10.01 to £20
- £20.01 to £30
- £30.01 to £40
- £40.01 to £50
- £50.01 and above:

## Time

### 15. What are your current arrangements for taking DCPC training during business hours?

- My DCPC training is during business hours, but my travel is not included as part of this
- My DCPC training is not done during business, but my travel is included
- Both my DCPC training and travelling to and from training locations is taken during my business hours
- Neither my DCPC training nor my travel are included in my business hours'

### 16. On average how many hours per day, when travelling to and from training locations, would you save if you did not have to travel to training course locations?

- I don't know
- 0 hours
- Up to 1 hour
- Above 1 and up to 2 hours
- Above 2 and up to 3 hours
- Above 3 and up to 4 hours
- Above 4 and up to 5 hours
- Above 5 hours:

[After answering go to 'Proposals for change']

## Organisation details

We are defining:

- a 'lorry driver employer' as an organisation which employs lorry drivers
- a 'bus or coach driver employer' as an organisation which employs bus or coach drivers
- a 'Driver Certificate of Professional Competence (DCPC) training organisation' as an organisation which provides DCPC training courses

- a 'road safety organisation' as an organisation that is focussed on the promotion and investigation of road safety, including the safety of road users
- an industry representative organisation' as an organisation that represents the interests of the transport, haulage, or passenger carrying sector

**17. Your organisation's name is?**

Parliamentary Advisory Council for Transport Safety (PACTS)

**18. The number of employees in your organisation is:**

1 to 9 employees?

10 to 49 employees?

50 to 249 employees?

250 employees or above?

**19. Your organisation is:**

a lorry driver employer?

a bus or coach driver employer?

a Driver Certificate of Professional Competence training organisation? (Go to 'Proposals for change')

an industry representative organisation? (Go to 'Industry representation: question 29')

a road safety organisation? (Go to 'Proposals for change')

another type of organisation? (Go to 'Proposals for change')

## Lorry, bus and coach driver employers

**20. To what extent does your organisation cover the cost of periodic DCPC training for your employees?**

All DCPC training is covered

Some DCPC training is covered

No DCPC training is covered

I don't know

The current average cost of 35 hours of periodic training ranges from £250 to £500, with a 7 hour module ranging between £50 to £100.

The proposal is that drivers may complete a test to renew their DCPC qualification instead of completing the 35 hours of training for driving within Great Britain (GB) and Northern Ireland (NI). It is proposed that tests will take place at existing Driver and Vehicle Standards Agency (DVSA) theory test venues.

Exact costs are to be determined, but high-level estimates anticipate a single sitting of the test would be in the region of between £40 to £70.

**21. As an employer, specify the maximum amount you would cover for an employee undertaking the proposed test option?**

- We would cover the cost regardless of the price
- We would not cover the cost regardless of the price
- We don't know if we would cover the cost of the test option
- We would cover the cost up to £20
- We would cover the cost up to £30
- We would cover the cost up to £40
- We would cover the cost up to £50
- We would cover the cost, but only up to (specify in whole pounds):

**22. What are your employees current arrangements for taking DCPC training during business hours?**

- Employees take DCPC training during business hours, but their travel is not included as part of this
- Employees do not take DCPC training during business hours, but their travel is included as part of this
- Both employees DCPC training and travelling to and from training locations is taken during their business hours
- Neither employees DCPC training nor my travel are included in their business hours

**23. You:**

- cover all the travel costs to and from training course locations for employees? (Go to 'Proposals for change')
- do not cover any travel costs to and from training course locations for employees? (Go to 'Proposals for change')
- cover some of the travel costs to and from training course locations for employees?

**Percentage of travel costs**



24. The percentage of travel costs you cover is?

Percentage:

## Lorry, bus and coach driver employers

25. You would cover the travel expenses to and from DVSA test centres in order for drivers to take the periodic test?

- Yes
- No (Go to 'Lorry, bus and coach driver employers: question 27')
- Don't know (Go to 'Lorry, bus and coach driver employers: question 27')

## Percentage of travel costs to DVSA test centre

26. The percentage of travel costs you cover would be?

Percentage:

## Lorry, bus and coach driver employers

27. You would pay for travel time to and from DVSA test centres in order for drivers to take the periodic test?

- Yes
- No (Go to 'Proposals for change')
- Don't know (Go to 'Proposals for change')

## Percentage of travel time to DVSA test centre

28. The percentage of travel time you cover would be?

Percentage:

## Industry representation

### 29. Are you representing another organisation?

- Yes
- No (Go to 'Proposals for change')

## Representation details

### 30. The organisation you represent is?

### 31. The number of employees in the organisation you represent is:

- 1 to 9 employees?
- 10 to 49 employees?
- 50 to 249 employees?
- 250 employees or above?

## Proposals for change

The Driver Certificate of Professional Competence (DCPC) is a qualification that some professional drivers are required to hold in addition to their driver licence. Its objective is to improve:

- road safety
- the professionalism of drivers

The DCPC is initially obtained by completing 4 modularised tests consisting of:

1. A two-part theory test.
2. Case studies.
3. A practical driving test.
4. A practical demonstration of vehicle operation.

Once a driver initially obtains their DCPC, it is valid for 5 years. To maintain the qualification beyond this period, drivers must complete 35 hours of training every 5 years, within an existing validity period, otherwise, the qualification will lapse.

If it does lapse, the DCPC can only be reinstated by completing the remainder of training, which could, depending on how much training the driver had completed up to that point, be the full 35 hours.

The proposed changes will only apply to commercial driving journeys within Great Britain (GB) and Northern Ireland (NI), should authorities there agree (as DCPC is a devolved matter). Drivers wishing to drive to, from or within the European Union (EU), including the Republic of Ireland, will need to comply with the existing arrangements for renewing the DCPC.

The proposed changes will look to:

- introduce a test option as an alternative to 35 hours of training for drivers renewing their DCPC and whose commercial driving is limited to GB and potentially NI
- remove the requirement for courses to be a minimum of 7 hours, or if split, 3.5 hours long
- remove the requirement that when a training course is split, including where part of this is made up of e-learning, that it must be completed over 2 consecutive days
- remove the operational requirement that only 2 hours of e-learning are permitted per single 'trainer led' course
- introduce a new regime for the re-entry of returning drivers
- allow for short-term extensions to the validity of DCPC and exemptions from the need to hold the DCPC in times of exceptional need for example a pandemic
- allow for the recognition or exchange of qualifications similar to the DCPC but obtained outside of the UK
- allow for the possibility of electronic DCPC evidencing instead of the Driver Qualification Card (DQC)

# DCPC appetite for reform

A review into DCPC which took place between November 2021 and January 2022 [opens in a new window], found that DCPC could benefit from reform.

## 32. In your opinion how effective is DCPC currently in meeting its stated aim of improving:

	Very effective	Effective	Neither effective or ineffective	Ineffective	Very ineffective	Don't know
road safety?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
professionalism of drivers?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Why?

PACTS report, What kills most on the roads, published in 2020, highlighted that light and heavy goods vehicles posed the most risk to other road users. PACTS believes that professional training and standards are particularly important for drivers of heavier vehicles to ensure an adequate level of competence and safety is maintained whilst driving on UK roads. This is not only for the benefit of drivers themselves but also for the safety of other road users by ensuring the skills of drivers are regularly updated. Incidents with heavier vehicles are more likely to lead to serious injury or death, especially of other road users. Driving a heavier vehicle is significantly different from a car, and as per the hierarchy of road users as set out in the Highway Code, those driving the heaviest vehicles have the greatest responsibility to reduce the danger or threat they may pose to other road users.

As noted in conclusions 2 and 6 of the DCPC review paper, DCPC requires reform to refocus training from prescriptive course completion to outcome-based learning. PACTS would support the inclusion of assessments at the end of the training module. PACTS strongly disagrees with second part of conclusion 1 of the review paper and we do not support the proposals for the periodic test to remove all mandatory training requirements.

It is difficult to clearly identify the road safety improvements that have resulted from the DCPC, but the number of accidents involving HGVs has fallen by 68% since 2007, when the DCPC was introduced. PACTS will be supportive of proposed measures only where they do not negatively impact road safety and do not increase the risk of collisions involving these vehicles.

## 33. You:

- think DCPC doesn't need reforming and should stay the same? (Go to 'Remain the same and don't know reasoning: question 35')
- think DCPC should be reformed? (Go to 'DCPC reform: question 36')
- think DCPC should be abolished?
- don't know? (Go to 'Remain the same and don't know reasoning: question 35')

## Why?

PACTS recognises that DCPC training is resource-heavy, taking significant time and money, we believe that the DCPC must continue, given that the training of these drivers relates directly to road safety. PACTS supports the measures in the consultation that add flexibility and reduce time and financial burden to drivers, but only where this is not at the expense of safety. PACTS would support the reforms to the DCPC training and introduction of N-DCPC, rather than to repeal or replace it with just a periodic test. PACTS also recognises that the proposed changes could create potential confusion, as there is the possibility that drivers could start to complete training to re

The consultation outlines three potential approaches to renewing the DCPC for GB-based drivers, and possibly NI drivers if approved. PACTS has concerns regarding the emphasis on the financial aspects of each proposed reform, particularly the cost difference between periodic training and periodic test proposals. While training cost is a considerable factor for businesses, the primary focus should be on ensuring road safety.

Given that the majority of commercial drivers in GB operate solely on domestic routes, it is indeed sensible to establish a reformed qualification specifically for this group. The N-DCPC addresses some of the criticisms of the more rigid I-DCPC and provides an appropriate method for renewing driving entitlements within the five years following the initial test. PACTS agrees with the establishment of the N DCPC .

Recognizing the UK's obligations under the Trade and Cooperation Agreement (TCA) with the EU, it is a good approach to support the continuation of the existing DCPC regime, rebranded as the I-DCPC. This will ensure that drivers performing international transport can continue to operate commercially in the EU, while also allowing the I-DCPC to be recognized as a valid entitlement for drivers who perform exclusively domestic transport operations in GB.

However, PACTS has significant concerns that the periodic test proposal may result in significantly less training being offered and therefore available overall. The test also cannot be tailored to the unique circumstances of each driver's job in the way the current training allows. If the proposal for periodic test goes ahead, the Department needs to ensure that the training of drivers does not deteriorate and drivers should receive trainer led and more bespoke training which is relevant to their.

## Reason for abolishment

34. As you want to abolish the DCPC and the remainder of this section is about proposed reforms to DCPC, you may now either: \*

- continue answering the rest of the questions in the survey?
- go to the 'Final comments' section? (Go to 'Final comments: question 109')

## Remain the same and don't know reasoning

35. As you believe the DCPC does not need reforming or you don't know your views on this, and the following sections are about proposed reforms to DCPC, you may now either: \*

- continue answering the rest of these questions?
- go to the next section on 'Changes to allow for short term extensions and exemptions in exceptional circumstances'? (Go to 'Changes to allow for short term extensions and exemptions in exceptional circumstances: question 94')

## DCPC reform

36. The changes you think are necessary are to:

- introduce a test option for DCPC periodic renewals?
  - offer more flexibility in DCPC training requirements?
  - continue developing core content for training modules?
  - use more informal assessments after training courses?
  - introduce new requirements for drivers looking to re-join the sector?
  - allow short-term extensions to DCPC validity periods in exceptional circumstances?
  - allow short-term exemptions from needing a DCPC in exceptional circumstances?
  - allow the recognition or exchange of qualifications, similar to DCPC, but obtained outside of the UK?
  - remove the need for drivers to carry a Driver Qualification Card (DQC) when driving in the UK?
  - add another issue or issues?
- 

## Ways of renewing DCPC

The existing process to renew a DCPC qualification, will remain and is currently the only way to renew a DCPC. Under the proposals it will become one of 3 ways to renew the DCPC for commercial journeys within Great Britain (GB), and Northern Ireland (NI), should officials there

agree. The existing process, which allows drivers to drive in the UK and Europe will now be referred to as the International DCPC (I-DCPC).

The I-DCPC requires:

1. The completion of 35 hours of training every 5 years, costing between £250 to £500.
2. Training modules, which make up the 35 hours of training, to be a minimum of 7 hours or 3.5 hours when split in half.
3. Drivers who are returning to the sector, for which a DCPC is required, to complete 35 hours of training before being eligible to drive.
4. The driver to carry their Driver Qualification Card (DQC) while working to evidence their qualification.

The 2 proposed additional routes for renewing the DCPC are referred to as the National DCPC (N-DCPC) 'Reformed Training' and the N-DCPC 'Periodic Test'.

N-DCPC 'Reformed Training' will:

1. Require the completion of 35 hours of training over 5 years costing between £250 to £500 (with some upward pressure on fees due to overheads).
2. Remove the requirement for training modules be a minimum of 7 hours, or 3.5 hours when split.
3. Allow returning drivers to complete less training before being eligible to return, making up the remainder of any training at a later date.

N-DCPC 'Periodic Test' will:

1. Introduce a test, forecast as costing in the region of £40 to £70 in early estimates, instead of the 35 hours of training.
2. Upon passing the test a driver has a 5-year DCPC validity period.
3. The option of the test can also be used by returning drivers.

Under both N-DCPC 'Reformed Training' and N-DCPC 'Periodic Test' drivers will only be eligible to drive in GB and NI (subject to NI agreement).

**37. Overall do you support the proposed changes under the N-DCPC 'Reformed Training' option?**

Yes

No (Go to "No" to DCPC 'Reformed Training' changes: question 39')

Don't know (Go to 'NDPC periodic test: question 40')

## 'Yes' to DCPC 'Reformed Training' changes

**38. You think the proposed changes to introduce N-DCPC 'Reformed Training' will:**

save time?

provide better work-life balance?

make renewing the DCPC cheaper?

help attract and retain drivers?

be beneficial for another reason?

[After answering go to 'NDPC periodic test: question 40']

## 'No' to DCPC 'Reformed Training' changes

39. You think the proposed changes to introduce N-DCPC 'Reformed Training' will:

add cost?

add time?

lead to confusion?

lead to a shortage of international drivers?

be damaging for another reason?

## NDPC 'Periodic Test'

40. Overall do you support our proposed changes under the N-DCPC 'Periodic Test' option?

Yes

No (Go to "No' to DCPC 'Periodic Test' changes: question 42')

Don't know (Go to 'Ways of renewing DCPC: question 43')

## 'Yes' to N-DCPC 'Periodic Test' changes

41. You think the proposed changes to introduce a N-DCPC 'Periodic Test' will:

save time?

provide better work-life balance?

make renewing the DCPC cheaper?

help attract and retain drivers?

be beneficial for another reason?

[Go to 'Ways of renewing DCPC: question 43']



## 'No' to DCPC 'Periodic Test' changes

42. You think the proposed changes to N-DCPC 'Periodic Test' will:

- add cost?
- add time?
- lead to confusion?
- lead to a shortage of international drivers?
- be damaging for another reason?

FACTS does not support the proposal of periodic test to renew the N-DCPC entitlement as an alternative to the reformed training route, as the removal of the mandatory periodic training element could significantly impact the road safety objective of the DCPC regime.

A positive aspect of the current DCPC regime is that drivers, possibly in consultation with operators, can select the five training modules they wish to take. Responsible drivers and employers will choose modules relevant to their specific sector or those that reinforce or update essential safety knowledge needed for daily operations. A periodic test consisting of 50 questions, regardless of how well-crafted, will inevitably require drivers to answer questions unrelated to their particular field, as the test must encompass the entire driver community. This situation could lead to the misallocation of time and resources, as drivers may need to study topics that have no bearing on the type of driving they engage in.

FACTS firmly opposes the periodic test option under the proposed N-DCPC and does not recommend its implementation.

## Ways of renewing DCPC

43. In your view how important is it that GB and NI have the same options for renewing DCPC?

- Important
- It makes no difference
- Unimportant
- Don't know

This question is for professional bus, coach or lorry drivers and their employers only, we are defining these as a:

- 'professional driver' as someone whose current principal work activity involves the driving of bus, coaches and lorries. Generally, driving is deemed not to be a driver's principal activity where it occupies less than 30% of their monthly working time
- 'lorry driver employer' as an organisation which employs lorry drivers
- 'bus or coach driver employer' as an organisation which employs bus or coach drivers

#### 44. Do you meet any of these target audiences?

- Yes
- No (Go to 'Proposed N-DCPC 'Periodic Test': question 46')
- Don't know (Go to 'Proposed N-DCPC 'Periodic Test': question 46')

## Approach choice

#### 45. If there was a choice between either I-DCPC, N-DCPC 'Reformed Training' and N-DCPC 'Periodic Test' which would you choose or recommend your drivers to choose?

- I-DCPC
- N-DCPC reformed training
- N-DCPC periodic test

## Proposed N-DCPC 'Periodic Test'

The proposal is to introduce the N-DCPC 'Periodic Test' alongside the I-DCPC and the suggested N-DCPC 'Reformed Training'.

Successfully passing the N-DCPC 'Periodic Test' would provide a driver with a 5-year entitlement to drive in the GB and NI.

We are consulting on 2 potential test methods for the N-DCPC 'Periodic Test' route option, these are the:

- 'New periodic test' which would be a total of 50 multiple choice and situational judgement questions lasting about 1 to 1 and a half hours, the questions would be designed to test

the knowledge and understanding of important material relevant to their work as a professional driver

- 'Initial test re-sit', this would involve drivers re-sitting part of the modularised tests they have to complete to obtain the DCPC qualification initially. These would be the two-part theory test (module one) and a case studies test (module two) or some variation of these. Currently, module one and module two together lasts 3 hours and 55 minutes, costing £60. We are subsequently consulting on how dual licence holders will have their DCPC renewed under the 'initial test re-sit option'.

**46. In your opinion how effective could the 'New periodic test' be in ensuring DCPC meets its stated objective of improving road safety?**

- Very effective
- Somewhat effective
- Neither effective nor ineffective
- Somewhat ineffective
- Very ineffective
- Don't know (Go to 'Proposed N-DCPC 'Periodic Test': question 48')

## Road safety reasoning

**47. Why?**

FACTS does not support the periodic test proposal. This consultation paper itself acknowledges that "the periodic test may result in significantly less training being offered and therefore available overall." While responsible operators will ensure their drivers receive adequate training for their jobs, with the DCPC qualification serving as the formal representation, some irresponsible operators and drivers might attempt to bypass much needed training. The periodic test proposal could enable them to reduce training while still obtaining the right to drive a heavy goods vehicle for the next five years after passing a 90-minute test, as opposed to completing 35 hours of training. This scenario must be prevented, and road safety should not just rely on on-the-job training that could help maintain standards mitigating the loss of these courses.

## Proposed N-DCPC 'Periodic Test'

48. In your opinion how effective could the 'New periodic test' be in ensuring DCPC meets its stated objective of improving professionalism of drivers?

- Very effective
- Somewhat effective
- Neither effective nor ineffective
- Somewhat ineffective
- Very ineffective
- Don't know (Go to 'Proposed N-DCPC 'Periodic Test': question 50')

## Professionalism of drivers reasoning

49. Why?

## Proposed N-DCPC 'Periodic Test'

50. In your opinion how effective could the 'Initial test re-sit' be in ensuring DCPC meets its stated objective of improving road safety?

- Very effective
- Somewhat effective
- Neither effective nor ineffective
- Somewhat ineffective
- Very ineffective
- Don't know (Go to 'Proposed N-DCPC 'Periodic Test': question 52')

## Initial test re-sit: road safety

### 51. Why?

PACTS expects that the theory test and case studies test as part of the initial test resit proposal, would provide a good refresher of knowledge for drivers. However, in the longer run, as would be the case with a new periodic test, this would not include tailored training as a training route would. This means that it is most likely drivers would receive less training and that not all elements of the test would be relevant to the driver's role.

## Proposed N-DCPC 'Periodic Test'

52. In your opinion how effective could the 'Initial test re-sit' be in ensuring DCPC meets its stated objective of improving professionalism of drivers?

- Very effective
- Somewhat effective
- Neither effective nor ineffective
- Somewhat ineffective
- Very ineffective
- Don't know (Go to 'Proposed N-DCPC 'Periodic Test': question 54')

## Initial test re-sit: professionalism of drivers

### 53. Why?

## Proposed N-DCPC 'Periodic Test'

54. Would you support giving drivers the choice of completing the N-DCPC 'Periodic Test' option along with the existing I-DCPC and N-DCPC 'Reformed Training' option?

- Yes
- No (Go to 'DCPC benefits and purpose: question 57')
- Don't know (Go to 'DCPC benefits and purpose: question 57')

## Against giving choice

55. Why not?

See responses to questions 42, 46, 47, and 51.

56. As you do not support giving drivers the choice of completing the N-DCPC 'Periodic Test' option and the following sections are about its implementation you may now either:

\*

- continue answering the rest of these questions?
- go to the next section on 'Proposals for N-DCPC 'Reformed Training'? (Go to 'Proposals for N-DCPC 'Reformed Training': question 69)?)

## DCPC benefits and purpose

These questions are for professional bus, coach and lorry drivers only.

We are defining a 'professional driver' as someone whose current principal work activity involves the driving of bus, coaches and lorries. Generally, driving is deemed not to be a driver's principal activity where it occupies less than 30% of their monthly working time.

57. Do you meet this target audience?

- Yes
- No (Go to 'Test options: question 60')
- Don't know (Go to 'Test options: question 60')

## Likely to renew

58. In your opinion would having a test option mean you would be more likely to renew your DCPC?

- Yes
- No
- Don't know (Go to 'Test options: question 60')

## Reasoning

59. Why?

## Test options

60. Of the 2 test options which do you think is the best option for drivers renewing their DCPC?

- The 'New periodic test'
- The 'Initial test resit' (Go to 'Initial test resit: question 62')
- I have no preference
- Don't know

## Test subjects

61. Which of these subjects do you think should be included in the 'New periodic test'?

- Drivers' hours
- Loading and unloading
- Health and safety (for example working from height)
- Tachographs
- Manual handling

Defensive driving and eco safe driving

Customer service

Safe urban driving

Disability awareness

Counter terrorism

Other topic or topics:

## Eligibility to drive following a test

People who hold the Category C and D driving licence, including their subcategories, are required to have a DCPC qualification when driving for commercial purposes.

Some drivers hold both C and D licences, or a variation of their subcategories. Such drivers are said to have 'dual entitlement' because they are entitled to drive vehicles for which a C licence is required, such as a lorry, and vehicles for which a D licence is required, such as a bus or coach.

When drivers obtain their DCPC qualification for the first time, through the 4 modularised tests, it is limited to the category of vehicle their driving licence relates to. For example, if a driver holds a Category C licence, the DCPC qualification is only valid for driving lorries.

**62. In your view should DCPC qualification renewal through the 'initial test re-sit' mean the DCPC maintained as a result is limited to vehicles covered by the driving licence?**

Yes

No

Don't know

## Number of tests

**63. For the 'New periodic test' do you think there should be:**

a single test for both category D (bus and coach) and category C (lorry) licence holders? (Go to 'Revision material: question 65')

different tests for each category, one test for category D (bus and coach) licence holders and another test for category C (lorry) licence holders?



## Dual entitlement licence

64. In the case of dual licence holders, where there are 2 tests, you:

- think they should only have to pass either the bus or lorry periodic test for qualification to drive either set of vehicles?
- think they should have to take both tests, the bus and lorry periodic test, for qualification to drive both sets of vehicles?
- don't know your preference?

## Revision material

These questions are for professional bus, coach and lorry drivers only.

We define a 'professional driver' as someone whose current principal work activity involves the driving of bus, coaches and lorries. Generally, driving is deemed not to be a driver's principal activity where it occupies less than 30% of their monthly working time.

65. Do you meet this target audience?

- Yes
- No (Go to 'Revision time: question 68')
- Don't know (Go to 'Revision time: question 68')

## Revision materials

66. If you were to take the 'New periodic test', would you purchase the revision materials?

- No
- Yes up to £20
- Yes up to £40
- Yes up to £60
- I don't know

67. If you were to take the 'Initial test re-sit', would you purchase the revision materials?

- No
- Yes up to £20
- Yes up to £40

- Yes up to £60
- I don't know

## Revision time

**68. In your view should the revision time required for the test and the time needed to take the test be part of drivers working hours?**

- Neither should be part of drivers working hours
- Yes, revision time only
- Yes, test time only
- Yes, both revision and test time
- I don't know

## Proposals for N-DCPC 'Reformed Training'

These questions are for professional bus, coach and lorry drivers only.

We define a 'professional driver' as someone whose current principal work activity involves the driving of bus, coaches and lorries. Generally, driving is deemed not to be a driver's principal activity where it occupies less than 30% of their monthly working time.

Current training modules must be a minimum of 7 hours although this may be split into 2 separate parts of 3.5 hours each. If split both parts must be completed over 2 consecutive days.

Under our proposals the minimum duration of a training course will be removed along with, when a training course is split, the requirement to complete both parts over 2 consecutive days. The requirement to complete 35 hours of training over 5 years will remain.

**69. Do you meet this target audience?**

- Yes
- No (Go to 'Proposals for N-DCPC 'Reformed Training': attraction and retention: question 72')
- Don't know (Go to 'Proposals for N-DCPC 'Reformed Training': attraction and retention: question 72')

# Training

70. In your view, would shorter training modules:

	Yes	No	Don't know
mean you are more likely to renew your DCPC?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
provide better work life balance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

71. In your view, would removing the requirement to complete split courses over 2 days mean:

	Yes	No	Don't know
you are more likely to renew your DCPC?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
provide better work life balance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Proposals for N-DCPC 'Reformed Training': attraction and retention

72. In your view how likely are the N-DCPC 'Reformed Training' changes to make it easier to:

	Very effective	Somewhat effective	Neither effective nor ineffective	Somewhat ineffective	Very ineffective	Don't know
attract drivers that require DCPC?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
retain drivers that require DCPC?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Why?

These reforms would make it easier for drivers to retain DCPC by providing more flexibility in training. However, as the overall amount of training will not be reduced, it is difficult to say whether this reformed training route would have any significant impact on attracting new drivers.

## E-learning

E-learning means training completed on a computer or electronic device like a tablet or smartphone, without the ability for students to interact with a trainer. This differs from a 'trainer-led' course where students interact with the trainer in some format.

Under current DCPC arrangements, e-learning can be taken as part of a split course. When it is taken as a split course, both parts of the course must be completed over 2 consecutive days. Furthermore operationally, 2 hours of e-learning is permitted per trainer led course allowing for a maximum of 10 hours of e-learning in every 35 hours of DCPC training.

Our proposal is to remove the requirement to complete a split course, containing e-learning, over 2 consecutive days and remove the requirement that only 2 hours of e-learning can be taken for every trainer led course.

**73. What, if any, time limit, between completion of the trainer-led course and corresponding e-learning do you think should be imposed?**

- Don't know
- No time limit should be imposed
- Up to 24 hours after the trainer-led course
- Up to 7 days after the trainer-led course
- Up to 30 days after the trainer-led course
- Within another time period, in days above 30 days:

## E-learning ease

This question is for professional bus, coach and lorry drivers only.

We define a 'professional driver' as someone whose current principal work activity involves the driving of bus, coaches and lorries. Generally, driving is deemed not to be a driver's principal activity where it occupies less than 30% of their monthly working time.

**74. Do you meet this target audience?**

- Yes
- No (Go to 'E-learning: question 76')
- Don't know (Go to 'E-learning: question 76')

## E-learning ease

75. What is the likelihood of you choosing to take courses which have an e-learning element if the changes proposed were implemented?

- Very likely
- Likely
- It makes no difference
- Unlikely
- Very unlikely
- Don't know

## E-learning

76. Do you think the proposed changes to DCPC e-learning will make it easier to:

	Yes	It makes no difference	No	I don't know
attract drivers to the sector?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
retain drivers in the sector?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Returning drivers

'Returning drivers' means those who previously held a DCPC qualification but allowed this to lapse and want to return to driving for which a DCPC is needed.

Currently returning drivers need to complete 35 hours of DCPC training to regain their qualification before they can return to driving for commercial purposes. The concern is that this is creating a cost and time barrier for drivers and industry.

We are suggesting 'specific return pathways' for gaining the N-DCPC qualification.

It is the proposal that the 'specific return pathways' would only be available for drivers whose DCPC qualification has been lapsed for:

1. More than 2 months.
2. Less than 2 years.

The 'specific return pathways' options we are considering are:

- the N-DCPC 'Periodic Test' proposal
- return to driver training, this would be a specific 'return to driving' module, tailored for the needs of experienced drivers

Details about the 'return to driving' module are that it will be 7 hours long, but completion will mean a driver can begin driving for commercial purposes following it, with the remainder 28 hours of training to be made up by an agreed date. The 'return to driving' module is expected to cost in the region of £50 to £100.

The proposed options to complete the remainder of training are:

- a further 7 hours of training every year in order to renew their qualification, which will be issued on an annual, rather than five-yearly basis. The driver can decide if they want to extend their DCPC validity period every year and in this scenario there would be no obligation to complete the full 28 hours of remaining training
- that the driver receives a 5-year DCPC validity period and must complete the remaining 28 hours of training within this. Furthermore, should a driver wish to continue driving beyond the first 5-years, they will need to complete a further 35 hours of training within this period on top of the 28 hours

**77. Do you support the principle of 'specific return pathways' to allow drivers to return to the sector?**

- Yes (Go to 'Minimum and maximum length of time a DCPC should have lapsed before drivers can use the return to driver pathway: question 80')
- No
- Don't know (Go to 'Continue answering on the 'specific return pathways': question 79')

## Against reasoning

**78. Why?**

Given that one of the aims of the DCPC is to improve road safety, PACTS would be opposed to allowing someone who had not driven in a professional capacity for a period of time to take less training initially to allow them to return to the sector. If anything, a driver who had taken a break would need more training and assessment than someone who had continuously driven and was renewing their DCPC.

## Continue answering on the 'specific return pathways'

79. As you do not or you don't know if you support reform and the rest of this section is about implementation of our 'specific return pathways' options you may now: \*

- go to the 'Changes to allow for short term extensions and exemptions in exceptional circumstances' section? (Go to 'Changes to allow for short term extensions and exemptions in exceptional circumstances: question 94')
- continue answering the questions on the 'specific return pathways'?

## Minimum and maximum length of time a DCPC should have lapsed before drivers can use the return to driver pathway

We are asking with regards to the 'specific return pathways' what is your view about the:

- minimum
- maximum

amounts of time a driver's DCPC qualification should have lapsed before they can be used.

80. In your view what is the minimum time, in months, a driver's DCPC qualification should have lapsed before they can utilise any of the 'specific return pathways'?

- Below 2 months
- From 2 and up to 3 months
- From 3 and up to 4 months
- From 4 and up to 5 months
- From 5 and up to 6 months
- From 6 and up to 7 months
- Another time period, in months:

**81. In your view what is the maximum time, in months, a driver's DCPC qualification should have lapsed before they can utilise any of the 'specific return pathways'?**

Below 12 months

From 12 and up to 18 months

From 18 and up to 24 months

From 24 and up to 30 months

From 30 and up to 36 months

From 36 and up to 42 months

Another time period, in months:

**82. Which of the 'specific return pathways' would you support?**

The N-DCPC 'Periodic Test'

The return to driver training (Go to 'Return to driver training: question 87')

Either the N-DCPC 'Periodic Test' or the return to driver training

None of these (Go to 'None of these: question 85')

Don't know (Go to 'Return to driver training: question 87')

## Test

**83. Why?**

PACTS does not agree with the proposal for specific return pathways and believes that returning drivers should complete the full DCPC as has been the case in the past.

If the government decides to go ahead with this specific return pathways proposal, we do not support the periodic test option to obtain the DCPC. PACTS would prefer the return to driver training option; giving drivers annual DCPC entitlement after completing 7 hours of training and assessment.



**84. As you prefer a test compared to the return to driver training option and the rest of this section is about its implementation you may now: \***

- go to the 'Attracting drivers' section? (Go to 'Attracting drivers: question 92')
- continue answering the questions on return to driver training? (Go to 'Return to driver training: question 87')

**None of these**

**85. Why and what alternative would you suggest?**

**86. As you do not support any of the 'specific return pathways' and the rest of this section is about their implementation you may now: \***

- go to the 'Changes to allow for short term extensions and exemptions in exceptional circumstances' section? (Go to 'Changes to allow for short term extensions and exemptions in exceptional circumstances: question 94')
- continue answering questions on the 'specific return pathways'?

**Return to driver training**

**87. You:**

- think the best option is that the remainder of training be completed every year, for a maximum of 7 hours, giving an annual DCPC entitlement? (Go to 'Return to driver training requirement: question 89')
- think the best option is that the 28 hours of remaining training is completed at any point within the five-year DCPC entitlement? (Go to 'Return to driver training requirement: question 89')
- think the best option for the return to driving training is completing neither of these options?
- don't know which is the better option? (Go to 'Return to driver training requirement: question 89')

## Neither of these options

88. What alternative would you suggest?

## Return to driver training requirement

89. In your opinion the hours of training that should be completed before a driver is allowed to return to driving commercially is?

- Don't know
- Up to 1 hour
- above 1 and up to 7 hours
- above 7 and up to 14 hours
- above 14 and up to 21 hours
- above 21 and up to 28 hours
- above 28 and up to 35 hours

90. In your view within what time period should a driver complete the remainder of their training after a 'return to driving' module in order to gain a 5-year entitlement to drive commercially?

- Don't know
- Within 1 year
- Between 1 and up to 2 years
- Between 2 and up to 3 years
- Between 3 and up to 4 years
- Between 4 and up to 5 years
- Another time period, in years:

91. What subjects do you think should be included in the 'return to driving' module?

- Drivers' hours
- Loading and unloading
- Health and safety (for example working from height)
- Tachographs
- Manual handling
- Defensive driving and eco safe driving
- Customer service
- Safe urban driving
- Disability awareness
- Counter terrorism
- Other topic or topics:

## Attracting drivers

92. Do you think the proposed changes for returning drivers are likely to make it easier to attract drivers to the sector?

- Yes
- Makes no difference
- No
- I don't know

93. In your view how many times should a driver be able to utilise the 'specific return pathways'?

- I don't know
- As many times as required
- Only once
- Specify a number of times it should be limited to:

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

It is proposed that there should be changes to allow for

- an extension to the validity of a DCPC qualification
- an exemption from the need to hold a DCPC qualification

for a limited time during 'exceptional circumstances'.

Exceptional circumstances are situations that may negatively impact the functioning of critical supply chains among other things. Recent examples of such a scenario were experienced in 2020 during the COVID-19 pandemic.

These next questions will ask about proposals for short term extensions and short term exemptions.

## 94. The circumstances that you think should trigger short term extensions are:

	Yes	No	Don't know
a pandemic for example COVID-19?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a national or international emergency for example the 2021 fuel tanker shortage?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
circumstances which would impact on the normal operation of the road transport industry?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
availability of training or test provision?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Other circumstances or issues for extensions:

**95. The circumstances that you think should trigger short term exemptions are:**

	Yes	No	Don't know
a pandemic for example COVID-19?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a national or international emergency for example the 2021 fuel tanker shortage?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
circumstances which would impact on the normal operation of the road transport industry?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
availability of training or test provision?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Other circumstances or issues for exemptions:

## Remaining in the sector

These questions are for professional bus, coach and lorry drivers and their employers only.

We define a:

- 'professional driver' as someone whose current principal work activity involves the driving of bus, coaches and lorries. Generally, driving is deemed not to be a driver's principal activity where it occupies less than 30% of their monthly working time
- 'lorry driver employer' as an organisation which employs lorry drivers
- 'bus or coach driver employer' as an organisation which employs bus or coach drivers

**96. Do you meet any of these target audiences?**

- Yes
- No (Go to 'Maximum length of extension and exemption periods: question 99')**
- Don't know (Go to 'Maximum length of extension and exemption periods: question 99')

# Sector remaining

97. In your opinion, would short term extensions mean:

	Yes	Extension would not affect decision	No	Don't know
you remain in the sector for the duration of the extension?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
your drivers remain in the sector for the duration of the extension?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Why?

98. In your opinion would short term exemptions mean:

	Yes	Exemption would not affect decision	No	Don't know
you return to the sector for the duration of the exemption?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
drivers previously in your employ return to the sector for the duration of the exemption?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Why?

# Maximum length of extension and exemption periods

It is anticipated that the maximum period of time:

- extensions will be valid for is 12 months
- exemptions will be valid for is 3 months

Furthermore, it is proposed that exemptions can only be used by drivers who previously held a DCPC but let this lapse.

## 99. Does the extension period seem like an appropriate amount of time?

Don't know

Yes

No, the extension period should be (in months):

## 100. Does the exemption period seem like an appropriate amount of time?

Don't know

Yes

No, the extension period should be (in months):

## 101. In your opinion should short term exemptions only be offered to those who previously held a DCPC qualification and let this lapse?

Yes

No (Go to 'Exchange and recognition: question 103')

Don't know (Go to 'Exchange and recognition: question 103')

Why?

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

## Lapse time

**102. For this exemption how long, in your view, is an acceptable period for the qualification to have lapsed in months?**

Above 3 and up to 12 months

Above 12 and up to 24 months

Above 24 and up to 36 months

Another time period in months:

## Exchange and recognition

There is currently no ability to exchange or recognise qualifications or training similar to DCPC, which has been obtained outside the EU (except where it is obtained in Norway, Iceland, Liechtenstein and Switzerland). However, the recognition of EU DCPCs may change in the future.

Our proposal is therefore to implement a process to allow exchange and recognition of qualifications, such as DCPC or similar, obtained outside of the GB or NI.

Recognition would involve identifying a countries qualification as equivalent to qualifications gained in GB or NI. Recognised drivers would be able to drive in GB or NI with their existing equivalent qualification.

Exchange would require drivers from certain countries to exchange their qualification for a GB or NI equivalent DCPC. Drivers would be required to undertake further tests or training to be recognised as equivalent prior to being granted a GB or NI DCPC. Drivers would not be able to drive in GB or NI until they were granted a GB or NI DCPC. The GB or NI DCPC could be the I-DCPC or N-DCPC provided the qualification was supplied by the GB or NI competent authorities.

**103. Would you support the creation of an exchange scheme for non-GB and non-NI qualifications?**

Yes

No

Don't know (Go to 'Exchange and recognition: question 105')



## Creation of an exchange scheme view

### 104. Why?

PACTS would support the creation of an exchange scheme that would allow drivers with non-UK qualifications to drive in the UK. This could make it easier for drivers from mainland Europe to drive in the UK and could also help make up for the shortage of HGV drivers in the UK.

## Exchange and recognition

### 105. Would you support the creation of a recognition scheme for non-GB and non-NI qualifications?

Yes

No

Don't know (Go to 'Electronic DQC's: question 107')

## Creation of a recognition scheme view

### 106. Why?

PACTS would support the creation of an exchange scheme that would allow drivers with non-UK qualifications to drive in the UK. This could make it easier for drivers from mainland Europe to drive in the UK and could also help make up for the shortage of HGV drivers in the UK.

## Electronic DQC's

The physical Driver Qualification Card (DQC) has been viewed by some as an inconvenience. It carries a cost to produce and is at risk of being lost or stolen, leaving drivers at risk of breaking the law. The proposal is that this could be removed by placing a marker or 'flag' on a driver's electronic driving record. This would remove the need to hold and carry a physical card.

This will only apply for drivers holding the N-DCPC. Drivers wishing to maintain the I-DCPC will still be required to hold a DQC and carry it when travelling in Europe (including the Republic of Ireland) and the UK.

### 107. What is your view on having the DQC replaced by an electronic version?

- I am in support of the DQC being replaced by an electronic alternative
- I would want to keep the physical DQC
- I am neither for or against it
- Don't know (Go to 'Final comments: question 109')

## DQC electronic version opinion

### 108. Why?

PACTS would support replacing the DQC with a digital version. This would mitigate the risk of DQC cards being lost or stolen.

## Final comments

### 109. Any other comments?

PACTS appreciates DfT's understanding that the current rules on periodic training, consisting of five blocks of seven hours of training, require reform to refocus training from prescriptive course completion to outcome-based learning. PACTS welcomes the proposal in the third conclusion of the DCPC Review Final Report, which aims to increase flexibility in training requirements.

The EU is also reviewing the DCPC framework directive and might propose lifting the 24-hour restriction on split training modules. If this occurs, the N-DCPC could remain a valid training module for the Joint Approvals Unit for Periodic Training. PACTS would like to see the Government to engage in dialogue with European authorities through the Specialised Committee for Road Transport, as established in Article 468 of the Trade and Cooperation Agreement, to manage potential future divergence and minimize disruption. Training modules offered in the market would still need to be approved by DVSA's to ensure their content aligns with the syllabus requirements outlined in the rules. This approval process would guarantee that drivers receive training on content deemed legally necessary for the subject being covered.