



Consultation Response: Amendments to Driver CPC regulations

28th April 2020

Dear Steve

I am responding on behalf of the Confederation of Passenger Transport (CPT), the trade association representing around 1000 operators and suppliers to the bus and coach sector. We circulated the link previously and discussed the consultation & our responses at an online meeting of the CPT Skills & Training Committee today.

Q.1 Yes

Q.2 No

Q.3 They may well do but there is a fundamental problem when one of the reasons for Driver CPC is to improve road safety and some 'non commercial' providers that operate under Section 19 & 22 permits are competing with 'o' licensed operators. We do not think it is appropriate for these permit holders to compete for business when they are subject to lower safety standards. There are significant numbers of large permit holders that fall into this category.

Q.4 Yes

Q.5 & Q.6 We have no comments on these questions

Q.7 Yes

Q.8 – 11 We have no comments on these questions

Q.12 Yes

Q.13 Yes

Q.14 Yes

Q.15 On balance, we feel two years is generally appropriate. Depending on fees, we should ask that consideration be given to offering both 1 and 2 year approval options.

Q.16 Yes

Q.17 No

Many thanks for your consideration

Kind regards

Keith

Keith McNally

Operations Director, CPT UK