



Confederation of Passenger Transport – response to 2023 DCPC Consultation

27th April 2023.

CPT specific considerations

CPT represents bus and coach operators throughout the UK. The operators of around 90% of local bus services alongside around 60% of coaches are amongst our circa 850 membership. We are recognised as the voice of the bus and coach sector.

In respect of the 2023 DCPC Consultation, CPT sought general views from its members, though more specifically via its groups and committees. These included:

- Bus Commission
- Coach Commission
- Recruitment and Training Group

As requested by DfT, CPT encouraged members to respond to the consultation on an individual basis, particularly to capture the views of drivers. The below, co-ordinated response is based on operators' perspectives.

CPT makes the following representations on behalf of its members in relation to relevant areas of the call for evidence. We have provided this information in an alternative format to the questionnaire offered by the Department for Transport in an effort to remain concise and objective.

DCPC training is generally seen by CPT members to be positive and has been embraced widely as part of operators' approach to delivery of continuing professional development. However, the current regime also presents certain challenges and we welcomed and actively contributed to the Government review of Driver CPC.

1. General outlook on creation of N-DCPC with 35 hours training

Positive:

- Implementation of the proposals would provide more flexibility for qualification renewals.
- There could be a positive impact on the current driver shortage. Having less restrictive options to comply will make it easier to obtain the new qualification for many.
- The flexibility of split module lengths means that drivers are likely to be better focussed on the course material for shorter time periods. It would also mean that short courses could be arranged for days when drivers are not fully occupied meaning that operators would not need to release drivers for a full day.



- 35 hours training ensures that operators can continue with a CPD approach for their drivers where they either administer or arrange training themselves for their workforce.
- The current (I-DCPC) hours requirements have been seen to be a barrier; additional flexibility is seen to be a good option.
- Drivers having a choice is seen to be beneficial, not just between I-DCPC and N-DCPC, but a choice for either training or examination.

Negative:

- The proposals are restrictive for coach operators, particularly for those that operate internationally. The national pool of drivers will be divided in DCPC qualification types.
- If the bus and domestic coach sector decide to train their staff in N-DCPC, then the ability for drivers subject to the N-DCPC to change to international qualifications at short notice is restricted. If, during a 5-year period, a driver has completed 35 hours for N-DCPC, they may have to undertake a further 35 hours training for I-DCPC, meaning they have completed double the requirements at likely double the cost, in order to do very similar work. Having said that, coach operators often have a dedicated team of drivers to undertake international work and drivers who haven't undertaken this sort of work before are likely to require additional training.
- There are potential administrative burdens for operators when having to check qualification validity, and to keep track of training completed by drivers to obtain the relevant qualification renewal. The administration of the two qualifications will be two-tier.
- Reducing the required times for module lengths means more course attendances by drivers.
- The I-DCPC vs N-DCPC may be seen as "two tier".

2. Use of an examination in lieu of 35 hours training

Positive:

- CPT members feel that the option to remove the specified time / attendance requirements will be more appealing.
- It is felt that an exam should be sector specific (either PSV or LGV).
- As the exam will be offered as an alternative option, those drivers that see a test as a barrier can opt to continue with the training route to qualification.
- An exam will assist where it is difficult to release drivers from duties, particularly during the current driver shortage when it is difficult to recruit and retain the desired level of workforce.

Negative:



- The exam option may put pressure on some drivers, particularly if a test is failed close to the expiry of the current held qualification.
- Failure of the exam may mean having to opt for the training route, meaning additional time and cost to the exam.
- Although the exam may be seen to be a quicker solution to qualification renewal, many operators will still see the need to provide drivers with training in advance of an exam. This may even need to be recognised as a module for the learning / training route to N-DCPC.
- There are concerns over DVSA capacity to administer the exam, this could mean that appointment lead times are longer than expected.
- Repetition of the examination route is seen to be a shift away from using DCPC as a means of continuous professional development, though no concerns have been raised by CPT members regarding repetition of either the exam or module-based routes to qualification renewal.
- CPT members feel that there should be more detail provided regarding how the test would be administered, and example content.
- Any mandated wait time prescribed between a test fail and re-sit. We should favour maximum flexibility although we understand the need to maximise availability of test slots by minimising the number of repeat exams taken

Test Content

CPT members are in favour of periodical test, though content should be dynamic and appropriate to the PSV role. Test content should include:

- Tachographs and drivers' hours
- Defensive driving
- Customer service
- Safe urban driving
- Disability awareness
- Counter terrorism
- Updates in relevant law
- Technology
- Society

However, it should be noted that many drivers work only in a certain part of the sector; those working as bus drivers have no need to understand the complexities of EU drivers' hours and tachographs whilst many coach drivers see little benefit in being tested on the domestic rules. Ideally, there would be most emphasis on areas common to both sides of the PSV sector.

3. Returning drivers

Qualification: The cut-off-point of 2 years since last holding a DCPC is seen by CPT members to be restrictive. Allowing a longer catchment of at least 5 years



would be of more benefit, this may see drivers who had left the sector on a more long-term basis make a return.

The proposed minimum of two months' lapse also appears unnecessarily restrictive. We see no reason why the options might not be available on day one.

One CPT member felt that returning drivers should have a lead time of 3 months to complete the relevant training, meaning that a driver could work for a maximum of three months before re-qualifying.

Access: Options for ease of access back into the sector are seen positively, particularly in light of a reduced burden for minimum training, the current regime (particularly time and cost) being a barrier to some prospective returning drivers.

Completion of training balance: The 7 hours per year option would be seen as beneficial to all drivers, not just those returning to the sector. Whilst we understand that the second option under the 'Return to driving training' proposal is designed to avoid drivers shortcutting the system, it does appear unnecessarily complex and would likely lead to confusion.

Module content: This should cover topics that mirror those outlined for the test content under point 2.

Considerations: Drivers returning may need to have focus on employer specific circumstances, rather than a general access approach. This may mean consideration of the vehicles to be operated, passenger specific needs, the geographical nature of the work to be undertaken etc.

4. **Exchange of qualifications**

CPT members see this as a positive step, simplifying the ability for access to the sector from abroad (outside of GB and NI), where standards are seen to match or exceed those required in GB and NI.

5. **Qualification limitations**

CPT members are of the view that the qualification should be specific to the type of vehicle (PSV OR HGV), with a separate approach required for each (test or 35 hours to gain the appropriate vehicle type qualification).

6. **Short term exemptions and extensions**

These proposals, for exceptional circumstances, are generally accepted by CPT members. It is not felt that the implementation of exemptions and extensions will be seen as a draw to drivers wishing to follow the N-DCPC route.

7. **Qualification evidence**

CPT members feel that allowing an electronic qualification will make things difficult, it may be preferable to have one, aligned system. It is accepted that



the future of the I-DCPC may, at some point, be made digital, and that at that point, N-DCPC requirements can be digitalised. A step towards the approach of some European nations may work, where evidence of DCPC is shown on driving licence records under licence code "95". We accept that there is difficulty with this as the qualification is administered by DVSA and not DVLA, and DCPC validity does not always align with vocational entitlement validity.

8. E-Learning

E-learning is seen by CPT members to offer increased flexibility, particularly when completed in conjunction with a test. E-learning requires less resource to administer and creates a more level approach when compared to how two different instructors may deliver content from the same module. Time limits for e-learning are seen to be a barrier, hence there should be no stipulation of e-learning time limit.

9. Further considerations

- It would be important that any training undertaken under either N-DCPC or I-DCPC would be 'banked'. Therefore, if a driver undertakes 2x7 hour courses that meet the I-DCPC requirement, they might then undertake 10x2 hour and 1x1 hour courses (or indeed pass the exam) to receive an N-DCPC. If they then transferred to international work within the 5-year validity period of their 2x7 hour courses, they should only need to undertake 3x7 hour courses in order to obtain an I-DCPC. CPT members feel that alignment between GB and NI is important.
- In some cases, CPT members feel that the current I-DCPC modules are unhelpful, and that the 7-hour modules can be "padded out" with superfluous items, just to make the hours requirement after the core subject has been covered. Any new approach to modules should deter this type of practice.
- We have had a call for DCPC training instructors to be better monitored and assessed, with benchmarked standards.
- A CPT member commented that the ability to check DCPC records should be simpler, and aligned to the system which allows checks of driving licence records. The current requirement to await a letter with an access password when signing up for an account needs to be modernised.
- CPT members believe that In House Theory Test Centres (IHTTCs) should be able to administer the DVSA exam route to N-DCPC. This would lessen the burden on DVSA and would correspond with the delegated allowance for certain operators to administer elements of driver testing.

Contact

We trust that this information will assist in the DfT Call for Evidence. CPT are able to assist further if required. Please contact operations@cpt-uk.org.

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