

Amendments to licensing restrictions: bus, coach and heavy goods vehicles (HGVs)

Personal details

Q1. What is your name?

Keith McNally

Q2. What is your email address?

keith.mcnally@cpt-uk.org

Q3. Are you responding on behalf of an organisation?

Yes, I am providing a response on behalf of an organisation

Organisation details

Q10. What is the name of your organisation?

Confederation of Passenger Transport (CPT)

Q11. What best describes your organisation?

Another organisation which has an interest in the matters being considered as part of this consultation

Proposal to remove the 50 kilometre (km) restriction for 18 to 20 year old bus and coach drivers

Q17. Do you agree or disagree with removing the 50km regular service restriction on 18 to 20 year old bus and coach drivers?

Agree for both bus and coach drivers

Agree with bus and coach proposal

Q22. Why do you agree with this proposed removal?

I believe 18 to 20 year old bus drivers should be able to undertake the same work as an over 21 year old bus driver

I believe 18 to 20 year old coach drivers should be able to undertake the same work as an over 21 year old coach driver

I believe that it would allow the bus industry to recruit more people in this age group

I believe that it would allow the coach industry to recruit more people in this age group

I believe that it would allow the bus industry to increase the number of positions available

I believe that it would allow the coach industry to increase the number of positions available

As a similar restriction is not in place for HGV drivers of the same age I believe both groups of drivers should be treated equally

Another reason:

There is no evidence that 18- and 19-year-old vocational drivers result in higher risks to road safety. HGV drivers can drive large trucks from age 18, without any distance limitation. An 18- or 19-year-old can currently drive a bus on regular services up to 50 kms and undertake a limited amount of other work including driving minibuses up to 16 seats on a variety of different types of work. There is no evidence that 18- and 19-year olds that undertake the work as set out in the previous two paragraphs present any greater risk to road safety than drivers aged 20 or more. Bus and coach operators ensure that all their drivers are suitably trained, usually to standards which are in excess of the minimum requirements for driver testing and compliance. There are many references in the consultation to removing the 50-kilometre regular service restriction for 18-20 year olds but we believe the restriction actually applies to 18 & 19-year-olds as 20-year-olds already have full flexibility. The legislation in this area is complex but Note 4 on page 11 of DVLA leaflet INS57P

<https://assets.publishing.service.gov.uk/media/6603f95cf9ab41001aeea361/ins57p-information-on-driving-licences.pdf> confirms that 'You can drive at age 20 after passing a PCV driving test and Driver CPC initial qualification'. It is noteworthy that a category B licence holder can drive a PSV which is over 30 years old, non-commercially with up to 8 passengers. This appears to cover any category B licence holder, regardless of age. <https://assets.publishing.service.gov.uk/media/636d26cee90e076198ef2fce/inf52-large-vehicles-you-can-drive-using-your-car-or-lorry-licence.pdf> Furthermore, operators, given the opportunity to recruit younger drivers, undertake their own evaluation of individual candidates, in order to ensure that they have the right temperament for the role. It should be noted that any perceived additional risk posed by younger drivers is also a risk assessed by the operator, with regards to their reputation, brand, and safety of customers.

Impact on the potential number of job applications

Q24. In your view would the removal of the 50km regular service restriction increase or decrease the number of bus and coach driver applicants aged 18 to 20 years old?

Yes, it will increase the number of applicants to be a bus and coach driver

Impact on the potential number of job applications reasoning

Q25. Explain your reasoning.

Most bus operations can currently be undertaken by 18 and 19-year-old drivers as buses are used to operate the majority of regular services up to 50 kilometres. There are relatively few regular services over 50 km that are operated by buses; this is mainly due to the additional flexibility in respect of drivers' hours rules on regular services under 50 km, meaning that operators design most bus services to be under 50 km. The impact of removing the restriction is therefore likely to be limited in respect of buses. However, we believe removing the restriction will raise the profile of a career in the sector for young people and offer greater prospects for development, thereby resulting in an increase in applications. Long distance express services represent the majority of regular services over 50 kms; these tend to be operated with coaches due to the greater comfort and additional luggage space that coaches offer. 18- and 19-year-olds are currently excluded from driving such services. It is in this area where we see the most scope for an increase in applications. As we set out later in our response, we believe the scope for an increase in applications would be much greater if 18- and 19-year-olds were able to undertake the full range of services and not just longer regular services.

Impact this proposal will have on the number of bus and coach driver applications

Q26. How many more or fewer people aged 18 to 20 do you think will apply to be a:

	6 to 10 more people per vacancy	1 to 5 more people per vacancy	No change	1 to 5 fewer people per vacancy	6 to 10 fewer people per vacancy	A different amount
bus driver per vacancy?						
coach driver per vacancy?						
If 'a different amount' state the amount:						
In a CPT member survey, 15 respondents provided that they receive applications from an average of 154 drivers over an average 3-month period. Those respondents expect the following outcome, should restrictions be changed for 18- and 19- year old candidates:						
- 35 additional applications are expected from 18- and 19-year-olds to undertake work on regular services of any distance. A 23% increase in applications.						
- 49 additional applications from 18- and 19-year-olds for tour and private hire type (coach) work, if the regular service restriction could also be lifted. A 32% increase in applications.						

Driver employment

Q27. In your view would bus and coach operators recruit more or fewer drivers aged 18 to 20 years old as a result of the removal of the 50km regular service restriction?

Yes, both bus and coach operators would recruit more 18 to 20 year old drivers

Driver employment reasoning

Q28. Explain your reasoning.

More 18- and 19-year-olds would likely apply for roles in the sector, due to greater awareness and prospects for development, resulting in more drivers of this age applying and being taken on.

18- and 19-year-olds would be able to drive bus services longer than 50 kms although such services are rare as covered previously. Bus operators would therefore enjoy greater flexibility in respect of being able to use drivers of this age for such services.

Coach operators would also enjoy greater flexibility but only in respect of the relatively limited number of regular services over 50 kms. The potential impact would be greatly increased if there were full flexibility for 18- & 19-year-olds, i.e. they were allowed to drive any type of service.

There is currently a very limited amount of work that coach operators can offer to 18- & 19-year-olds – primarily home-to-school services that fit within the 'regular service under 50km' definition. If drivers of this age were not so restricted, employers would be more likely to recruit them.

Furthermore, the availability of more diverse opportunities in the bus and coach sector for 18- and 19-year-olds means that more of this talent pool may be harnessed directly from secondary education. Currently, those not wanting to undertake local bus service work only until the age of 20 are likely to go to roles elsewhere, and are lost to our sector.

The International Road Transport Union states that at the beginning of 2023, across Europe, only 5% of bus and coach drivers were aged under 25, the average age of a PSV driver is 52.

Impact on bus service provision

Q29. Do you believe that removing the 50km regular service restriction on 18 to 20 year old bus drivers could result in bus service provision increasing?

No

Impact on bus service provision reasoning

Q30. Explain your reasoning (providing any evidence)?

Comments:

As previously outlined, the number of regular services longer than 50 kms operated by buses are rare due to the domestic drivers' hours legislation.

Removing the restriction is likely to have a positive overall effect on recruitment and employment in the bus sector but this may be too small to result in increased service provision, given the driver shortages that the sector is still dealing with.

The impact is likely to be much greater in respect of coach provision.

Impact on coach service provision

Q31. Do you believe that removing the 50km regular service restriction on 18 to 20 year old coach drivers could result in coach service provision increasing?

Yes

Impact on coach service provision reasoning

Q32. Explain your reasoning (providing any evidence)?

Comments:

The coach sector has experienced severe driver shortages since 2021. When CPT first conducted a driver shortage survey in September of that year, the shortage in the coach sector was 17.2%. It remained in the 14 – 16% range until February 2023. The May and September 2023 surveys showed some improvement, and the January survey indicated the lowest figure since the issue first surfaced with a shortage of 9.6%; this was based on submissions from over 50 coach operators. However, it should be noted that there is some seasonality in the coach sector and a lower shortage figure in January may not be fully representative of the picture based on average requirements over the whole year.

The scheduled long-distance coach market is expanding, and driver requirements are constantly increasing. The 50 km restriction on 18- and 19-year-olds excludes drivers of this age group and removing the restriction would widen the pool of recruits and support increased service provision.

A CPT member who operates a large number of long distance coach services agreed that removing the restriction would lead to coach service provision increasing, and provided that; “The scheduled long-distance coach market is expanding, and driver requirements are constantly increasing. The 50 km restriction on 18- and 19-year-olds excludes drivers of this age group and removing the restriction would widen the pool of recruits and support increased service provision.

There is of course an experience risk in terms of driving longer distance and intercity operations, and I feel it is important to highlight that as a risk, but overall anything to help the sector has to be positive.”

It must be highlighted that coach operators will manage any perceived risk, providing additional training, including; vehicle familiarisation, route learning with other drivers and ongoing CPD, including relevant Driver CPC modules. Operators may also allocate new drivers to work on shorter services or those that have two drivers, until they develop some experience.

Impact on road safety

Q33. Do you believe removing the 50km regular service restriction for:

	Yes	No	Don't know
bus drivers could have a negative impact for overall road safety?		X	
coach drivers could have a negative impact for overall road safety?		X	

Explain why you think that, including any evidence.

There is no evidence that 18- & 19-year-old drivers are any less safe for the work they can currently undertake. 18- & 19-year-old drivers can currently operate regular bus/coach services up to 50 kilometres and many truck operations of any length. The evidence is that they can do this safely.

An 18- or 19-year-old PSV driver can also currently drive an empty bus or coach for an unrestricted distance to the start, or from the end of, a(max) 50km long service. Effectively, a driver could have already completed in excess of the distance restriction at the point which they collect passengers.

It should be noted that there may be little difference between a 50km service being repeated during a duty, and a service continuing on in excess of 50kms. An example; a service between Middlesbrough and Whitby (49kms) could be driven by an 18- or 19-year-old driver. The driver could undertake multiple round trips within a duty. If the service went from Middlesbrough to Scarborough, an 18- or 19-year-old driver could not be used to drive the service, although the additional section between Whitby and Scarborough traverses similar roads and terrain as the initial section of the route between Middlesbrough and Whitby. Furthermore, the section between Whitby and Scarborough could be currently undertaken if registered as a separate service, after the initial service is undertaken from Middlesbrough to Whitby.

This would suggest that removing the 50 kilometre restriction, and indeed allowing 18- & 19-year-olds to undertake any type of PSV work, including tours, excursions and private hire - in the way they can undertake any type of HGV work - would not have any negative impact on road safety.

Furthermore, CPT sought vocational driving test pass data from the DVSA covering the period 1/10/22 – 30/9/23. During that period 9.9% of 18- and 19-year-old category D and D1 candidates passed with a clean sheet (no faults), compared to 8.7% across those who passed aged 20 and over.

Considering the latest (2022) DfT data on collisions (DfT Table ras0501) and combining it with data relating to the number of licence holders of different types and age (obtained from DVLA), we have identified that the youngest vocational drivers (those aged 17-20, which is the closest age bracket available in the reported data) present a very different risk compared to non-vocational drivers of the same age. The DfT/DVLA data shows that the likelihood of a vocational driver in this youngest age bracket having a collision is less than half that of a non-vocational driver in that age bracket: 0.65% compared to 1.38%. This is despite the fact that the vocational drivers are likely to be driving many, many more miles than their non-vocational counterparts. The data also shows very little difference in likelihood of a vocational driver in this age bracket having an accident compared to a vocational driver in the next age bracket (aged 21 to 24) [likelihood 0.61%], or indeed drivers aged 25 or over [likelihood 0.46%]. The data shows a similar picture in 2021 and previous years.

Risk of accidents

Q34. Do you believe bus and coach drivers aged 18 to 20 would have an increased or decreased risk of being involved in a road traffic accident due to driving a route above the 50km regular service restriction?

There is no change of risk for either of these drivers

Implementing the removal of the 50km regular service restriction on bus and coach drivers aged 18 to 20

Q37. If the proposal to remove the 50km regular service restriction on 18 to 20 year old bus and coach drivers was implemented, do you believe this would have a negative impact on insurance premiums for:

	Yes	No	Don't know
bus operators?		X	
coach operators?		X	
all drivers?		X	

Provide an explanation for your reasoning.

Many larger bus operators are self-insured so they don't pay insurance premiums; such operators provide the majority of bus services in the UK.

In a CPT survey, we asked members; Are you concerned about insurance premiums increasing?

- 57% were not concerned about insurance premiums increasing.
- 35% had concerns about increases for young drivers able to both drive regular services in excess of 50kms, and to drive non-regular services in excess of 50kms.
- 13% of respondents were not sure.

Of respondents to the CPT survey are insured traditionally with insurance brokers, 54% were not concerned about insurance premiums increasing. Only 23% had concerns about increases, and 15% were not sure.

Coach operators pay premiums based on various risk factors associated with their individual business. An ability to employ 18- & 19-year-old drivers to operate longer regular services or indeed any type of service, including private hire, tours and excursions would not translate into higher premiums.

It is possible that an operator that did employ such younger drivers to operate some services would face higher premiums but the discussions that we have had with operators and insurance brokers in our sector indicate that underwriters would take a balanced and pragmatic approach and would be more likely to impose limitations on the number of drivers in this age category that could be employed, rather than impose higher premiums.

Age and accidents

Q38. Do you believe that a bus driver, aged 18 to 20 years old, has the same level of risk of being involved in an accident compared to the same age group driving another vehicle (for example a car or motorbike)?

No

Age and accidents - bus reasoning

Q39. Explain your reasoning (including evidence).

- File: CPT Annex 1.docx

Comments:

Operators employ rigorous selection processes and provide extensive training to new drivers. Operators take very seriously their responsibilities with regard to the safety of passengers. Apart from the moral duty to keep people safe, operators want to minimise costs and protect their reputation; a bus or coach business relies on people trusting it to transport them safely. Operators assess risk and implement strategies to minimise risks across all aspects of their operations. They take a responsible approach to the recruitment and training of drivers of any age. Different individuals have varying aptitudes and skills, and operators can flex their training where needed. They would naturally take a risk-based approach to employing 18- and 19-year-old drivers to undertake longer regular services or any type of service if that were permitted.

As part of the risk management approach, many operators use various forms of monitoring tools to review the performance of all drivers and intervene when any issues are highlighted.

The position outlined above is not comparable to younger drivers who pass their car driving test and have their own car, with no training beyond that intended to help them pass their test and usually no monitoring post-test.

A recent CPT survey provided that 18- and 19-year-old PSV drivers accounted for 0.9% of the driving roles within their businesses over the last 2 years. Data covers a sample size of 11908, which CPT believes is over 10% of the total number of PSV driver roles in the UK.

Over the last 2 years survey data provided that:

- In relation to accidents across the board, 18- and 19-year-old PSV drivers had an average accident rate of just 1.08 per driver, compared to 2.48 for drivers aged 20 and over.
- In relation to accidents resulting in any injury, 18- and 19-year-old PSV drivers had an accident rate of 0.009 per driver, compared to 0.048 for drivers aged 20 and over.
- In relation to accidents resulting in serious injury or fatality, 18- and 19-year-old PSV drivers suffered an accident rate of 0%, compared to 0.1% suffered by those aged 20 and over.

CPT has separately provided data from Lothian Buses (CPT Annex 1), which includes detailed accident rates. Lothian employs 18- and 19-year-old bus drivers.

Age and accidents - coach

Q40. Do you believe that a coach driver, aged 18 to 20 years old, has the same level of risk of being involved in an accident compared to the same age group driving another vehicle (for example a car or motorbike)?

No

Age and accidents - coach reasoning

Q41. Explain your reasoning (including evidence).

Comments:

We don't believe that the position for coach drivers is any different to that for bus drivers, as set out in our response to the previous, identical question in relation to bus drivers:

Operators employ rigorous selection processes and provide extensive training to new drivers. Operators take very seriously their responsibilities with regard to the safety of passengers. Apart from the moral duty to keep people safe, operators want to minimise costs and protect their reputation; a bus or coach business relies on people trusting it to transport them safely. Operators assess risk and implement strategies to minimise risks across all aspects of their operations. They take a responsible approach to the recruitment and training of drivers of any age. Different individuals have varying aptitudes and skills, and operators can flex their training where needed. They would naturally take a risk-based approach to employing 18- and 19-year-old drivers to undertake longer regular services or any type of service if that were permitted.

As part of the risk management approach, many operators use various forms of monitoring tools to review the performance of all drivers and intervene when any issues are highlighted.

The position outlined above is not comparable to younger drivers who pass their car driving test and have their own car, with no training beyond that intended to help them pass their test and usually no monitoring post-test.

In addition to the tools available to bus operators, coach operators, often with duties planned to include crews of two drivers, may be able to use younger staff on those operations, helping them develop experience whilst working with a more seasoned colleague.

The coach arm of CPT member, National Express provides that, "we have no evidence to suggest that young drivers are any riskier than any other population of drivers. We do employ younger drivers in our bus business and our training provides our drivers, regardless of age, with excellent technical and non-technical competence"

Age and accidents - bus

Q42. Do you believe that removing the 50km regular service restriction on a bus driver, aged 18 to 20 years old, will increase the likelihood of a person of that age being involved in an accident?

No

Age and accidents - bus reasoning

Q44. Explain your reasoning (including evidence).

- File: CPT Annex 1.docx

Comments:

There is no evidence that the risk for younger drivers of PSVs and HGVs increases with distance. Currently, younger drivers, aged 18 or 19, can drive minibuses (up to 16 seats) without restriction, empty larger buses and coaches, or HGVs without restriction.

As explained previously, there are relatively few regular services over 50 kilometres that are operated with buses.

Also, please note our example, provided in the question "Impact on road safety - Do you believe removing the 50km regular service restriction for bus / coach drivers could have a negative impact for overall road safety?" Also note the data from Lothian Buses provided as attachment CPT Annex 1.

Considering the latest (2022) DfT data on collisions (DfT Table ras0501) and combining it with data relating to the number of licence holders of different types and age (obtained from DVLA), we have identified that the youngest vocational drivers (those aged 17-20, which is the closest age bracket available in the reported data) present a very different risk compared to non-vocational drivers of the same age. The DfT/DVLA data shows that the likelihood of a vocational driver in this youngest age bracket having a collision is less than half that of a non-vocational driver in that age bracket: 0.65% compared to 1.38%. This is despite the fact that the vocational drivers are likely to be driving many, many more miles than their non-vocational counterparts. The data also shows very little difference in likelihood of a vocational driver in this age bracket having an accident compared to a vocational driver in the next age bracket (aged 21 to 24) [likelihood 0.61%], or indeed drivers aged 25 or over [likelihood 0.46%]. The data shows a similar picture in 2021 and previous years.

Age and accidents - coach

Q45. Do you believe that removing the 50km regular service restriction on a coach driver, aged 18 to 20 years old, will increase the likelihood of a person of that age being involved in an accident?

No

Age and accidents - coach reasoning

Q47. Explain your reasoning (including evidence).

Comments:

There is no evidence that the risk for younger drivers of PSVs and HGVs increases with distance. Currently, younger drivers, aged 18 or 19, can drive minibuses (up to 16 seats) without restriction, larger unladen buses and coaches without restriction, or HGVs without restriction.

Due to the current regular service under 50-kilometre restriction on 18 & 19-year-olds, there are relatively few drivers of this age driving coaches. This is because the job is less attractive to this age group and drivers of this age can't be used on the range of services that coach operators want them to undertake, so the operators are therefore less likely to employ them.

The best evidence would therefore relate to the HGV sector where younger drivers already have full flexibility.

.Considering the latest (2022) DfT data on collisions (DfT Table ras0501) and combining it with data relating to the number of licence holders of different types and age (obtained from DVLA), we have identified that the youngest vocational drivers (those aged 17-20, which is the closest age bracket available in the reported data) present a very different risk compared to non-vocational drivers of the same age. The DfT/DVLA data shows that the likelihood of a vocational driver in this youngest age bracket having a collision is less than half that of a non-vocational driver in that age bracket: 0.65% compared to 1.38%. This is despite the fact that the vocational drivers are likely to be driving many, many more miles than their non-vocational counterparts. The data also shows very little difference in likelihood of a vocational driver in this age bracket having an accident compared to a vocational driver in the next age bracket (aged 21 to 24) [likelihood 0.61%], or indeed drivers aged 25 or over [likelihood 0.46%]. The data shows a similar picture in 2021 and previous years.

Age and accidents - bus

Q48. Do you believe that a bus driver, aged 18 to 20 years old, with the same amount of driving experience as a driver aged 21 and above has the same level of risk of being involved in an accident?

Yes

Age and accidents - bus reasoning

Q49. Explain your reasoning (including evidence).

Comments:

There is limited data available because of the current restrictions on 18- and 19-year-olds but we don't believe that drivers of this age are inherently any less safe than peers in older age groups with the same level of experience.

Driving experience can be evaluated in a number of ways, not just in the amount of time behind the wheel. For example, a long distance, direct coach service between Heathrow and Milton Keynes Coachway, using largely motorway only may be much less difficult of a route to drive than the circular hop-on-hop off tour in Whitby which uses narrow, pedestrian-filled streets, steep hills and tight turns. The latter service may already be undertaken by a PSV driver aged under 20.

76% of CPT members who responded to a specific question believe that a bus driver, aged 18 or 19 years old, with the same amount of driving experience as a driver aged 20 or above has the same level of risk of being involved in an accident.

*18- and 19-year-olds are currently restricted to regular services up to 50km.

Age and accidents - coach

Q50. Do you believe that a coach driver, aged 18 to 20 years old, with the same amount of driving experience as a driver aged 21 and above has the same level of risk of being involved in an accident?

Yes

Age and accidents - coach reasoning

Q51. Explain your reasoning (including evidence).

Comments:

There is limited data available because of the current restrictions on 18- and 19-year-olds but we don't believe that drivers of this age are inherently any less safe than peers in older age groups with the same level of experience.

Our response to this question aligns with our response to the earlier identical question in relation to bus drivers.

It is notable that coaches are, on occasion, used on regular service work already by 18- and 19-year old PSV drivers. The licence restrictions do not provide restriction to vehicle type.

75% of CPT members who responded to a specific question about this in a recent survey believe that a coach driver, aged 18 or 19 years old, with the same amount of driving experience as a driver aged 20 or above has the same level of risk of being involved in an accident, if allowed to undertake any type of services without the 50km / regular restriction.

Alternative proposal

Q52. Would you prefer an alternative proposal to our suggested approach of removing the 50km regular service restriction for bus and coach drivers aged 18 to 20 years to be implemented?

Yes, for both buses and coaches

Alternative proposal

Q53. Would you prefer an alternative proposal of:

another restriction should be put in place?

None of the options provided was really suitable for our alternative proposal so we have selected this box. We believe that 18- and 19-year-olds should have the same flexibility as older PSV drivers and HGV drivers aged 18 and over. That is, they should be able to operate regular services of any length and all other types of service. We don't believe there is any evidence to support maintaining the current restrictions. The HGV sector operates with 18- and 19-year-olds driving the full range of services and we don't believe that there is any evidence that suggests that this practice is unsafe, this includes being allowed to drive dangerous goods in streets with high concentrations of pedestrians and/or cyclists. Furthermore, the allowances for 18- and 19-year old HGV drivers to drive unrestrictedly is mirrored in 24 of 37 EU member states. 18- and 19-year-olds can currently drive regular services such as local bus or home-to-school services up to 50 kms but are not allowed to drive a group of people on a day-out, school trip, airport transfer, or any other type of 'non-regular' trip, even if it is under 50 kms. There is no apparent logic to this.

Other comments on proposal

Q57. What, if any, other comments do you have concerning the proposal to remove the 50km regular service restriction on 18 to 20 year old bus and coach drivers?

As explained in our response the earlier question, under "Agree with bus and coach proposal - Why do you agree with this proposed removal?", We believe the current restriction applies to 18- and 19- year-olds as 20-year-olds already have full flexibility.

We understand that to remove the "regular services" part of the restriction, would mean a change to Article 5, 3, (a)(i) and (a)(ii) of EC Directive 2003/59/EC, adopted, post-Brexit in to UK domestic legislation. As we see it, this would need to be amended also, to allow for the 50km limit to be removed.

Consideration of amending the "regular services" wording could be made via ongoing Department for Transport work to reform the Driver CPC, which proposes to introduce a UK domestic variant of the qualification.

Removing the requirement to hold a provisional bus, coach or HGV licence to undertake the theory and off-road modules of the DCPC test

Q58. In your view, should a person be able to undertake the theory, case study and practical demonstration modules of the DCPC test (Option 1) before receiving a provisional:

	Yes	No	Don't know
bus entitlement?	X		
coach entitlement?	X		
HGV entitlement?	X		

Explain why you think this (giving any examples and evidence if you can)?

Allowing this would help streamline recruitment, with no risk to safety. Our members believe that any disadvantages (in terms of sunk costs) are outweighed by the benefits that this would give them. We set out more detail in our response to later questions.

We speak for the bus and coach sectors but we can see no reason why the extra flexibility should not also be offered to those wishing to become an HGV driver. The current rules mean that those applying for a PSV provisional are automatically granted HGV entitlement as well as PSV if their application is successful.

Q59. In your view, if a driver has an existing health condition, should a decision by the Driver and Vehicle Licensing Agency be reached as to whether that health condition will prevent the person from holding a vocational driving licence before allowing that person to undertake any of the modules set out in Option 1 for:

	Yes, the decision should be reached before a person can undertake any of the modules	No, the decision can be made after the person undertakes some or all of the modules	Don't know
bus driving?		X	
coach driving?		X	
HGV driving?			X

Explain why you think this (including any examples and evidence)?

There is no risk to road safety as drivers would not be allowed to drive a large vehicle on the road. There would be a risk to the operator inasmuch as they might pay for the candidate to undertake the off-road modules, only for DVLA to subsequently make a decision that a provisional licence cannot be granted due to a health condition; the operator would then forfeit their investment in the candidate. However, they would be able to decide, based on their assessment of that risk whether to go ahead with the training and testing for the off-road modules prior to a provisional licence being granted. Many of our members, employing tens of thousands of drivers, have indicated to us that they would be willing to take that risk, due to the benefits of doing so.

The medical would still be undertaken before the candidate starts training/testing and the operator would review the completed form and note anything of concern identified by the doctor.

Regards HGV, we don't feel qualified to answer but even if the HGV sector were less inclined to take up this option, we can't see any reason not to afford the greater freedom to HGV as well.

Q60. In your view, should a decision be reached in respect to whether a person's past conduct should prevent them from holding a vocational licence before a person can undertake any of the modules set out in Option 1 for:

	Yes, a decision should be reached before a person can undertake any of the modules	No, matters relating to a driver's conduct can be investigated while a person undertakes some or all of the modules	Don't know
bus driving?		X	
coach driving?		X	
HGV driving?			X

Explain why you think this (including any examples and evidence)?

We should highlight that the current arrangements are designed to protect the public but the driver would have no contact with the public whilst undertaking the Option 1 modules.

There would be a risk to the operator inasmuch as they might pay for the candidate to undertake the off-road modules, only for a decision DVLA to be subsequently make that a provisional licence cannot be granted due to a conduct issue; the operator would then forfeit their investment in the candidate. However, they would be able to decide, based on their assessment of that risk whether to go ahead with the training and testing for the off-road modules prior to a provisional licence being granted. Many of our members, employing tens of thousands of drivers, have indicated to us that they would be willing to take that risk, due to the benefits of doing so. Refusals based on conduct are relatively rare.

The PSV non-driving conduct restrictions do not apply to HGV.

Removal of the requirement to hold a provisional licence before undertaking the theory, case study and practical demonstration modules: Option 1

Q61. If Option 1 were implemented would you have any "health and safety" concerns?

No

Removal of the requirement to hold a provisional licence before undertaking the theory, case study and practical demonstration modules: Option 1

Q64. If Option 1 was implemented do you believe there would be benefits for the bus, coach and HGV sectors?

Yes, for all 3 sectors

Option 1 all 3 benefits

Q71. Which, if any, of the following benefits do you think could be achieved by implementing Option 1?

	Drivers could begin their career straight away	The length of time it takes to train new drivers could be shortened	Other benefits
For buses	X	X	X
For coaches	X	X	X
For HGVs	X	X	X

If 'other benefits' explain what benefits

Currently, the process would usually be that an operator interviews a candidate and makes a job offer if they think they are suitable. If the candidate accepts the job offer, they would then undergo a medical and complete an application for a provisional licence. This is posted to DVLA, the Agency undertakes various checks and then issues a provisional licence if everything is satisfactory; this is posted back to the applicant. The applicant advises the operator, and a start date is arranged. They arrange tests for modules 1 & 2. Module 1 is made up of a theory test (multiple-choice questions - Mod 1a) and a hazard perception test (Mod 1b). Once these are passed, tests for Modules 3 & 4 can be arranged. Candidates must pass module 3a before undertaking module 3b. There is therefore considerable sequencing and the waiting time for each module can add considerably to the overall period between interviewing a candidate and them becoming operational as a driver.

Many larger operators have a delegated driving examiner (or several examiners) and the arrangement of tests is easier. Smaller operators are reliant on DVSA for modules 1 & 2, and in some cases 3a and 4. All small operators are reliant on DVSA for Module 3b (the on-road practical test).

Based on data supplied by DVSA for the period April to September 2023, average waiting times varied by module and location.

Across all test centres, average wait times for Module 1a was 23 days but was up to 84 days at some test centres. The average waiting time was 4 weeks or more at 88 of the 150 test centres. Average wait times for Module 3b tests were slightly better.

The majority of Module 3a tests are now provided by the private sector and there is reasonable availability in most areas. As mentioned above, most smaller operators are reliant on DVSA for Module 3b – the on-road practical test. Waiting times for this part of the test were pretty good at an average of 4.1 days. However, waiting times were up to 11 days at some centres and were two weeks or more at 7 of the 43 test centres where tests were available.

Average waiting times for Module 2 were slightly better than for Module 1 – an average of 19.5 days across all test centres but up to 63 days at some. Average waiting times were 4 weeks or more at 58 of the 139 test centres offering the test.

Module 4 can be booked once Module 2 is passed (as above). Average waiting times for Module 4 tests provided by DVSA were only 2.7 days and these tests were available within two weeks at the vast majority of test centres, although data was only available for 35 centres, suggesting that in most cases, operators utilise private-sector provision.

Waiting times were considerably longer during the COVID-19 pandemic and for periods, tests were not available at all. However, even based on the waiting times from last year as set out above, the importance of being able to get on with the training and testing process as soon as possible is clear. The initial tests cannot be booked until the provisional licence is issued so the total time for bringing a new driver through the process extends an already lengthy period.

If the proposal were implemented, the operator would not need to wait for the provisional licence to be granted and could therefore employ the candidate and begin the training and testing process. Drivers could therefore begin their career straight away.

DVLA times for processing provisional applications is covered in our response to the next question.

We have ticked 'The length of time it takes to train new drivers could be shortened' box in all cases. We believe it would be more accurate to say that 'the length of time between a candidate accepting the offer of a job from the operator and that individual becoming operational as a driver would be shortened'. The actual overall training time is unlikely to be affected.

The key 'other' benefit is that the number of candidates who are offered a job, accept the role but then

Q71. Which, if any, of the following benefits do you think could be achieved by implementing Option 1?

never commence training would be reduced. We cover this in more detail in our response to later questions.

We can't comment with certainty regarding the HGV sector as we have no expertise in that area.

Removal of the requirement to hold a provisional licence before undertaking the theory, case study and practical demonstration modules: Option 1

Q72. In your view would allowing people to undertake the theory, case study and practical demonstration modules of the DCPC test before receiving a provisional licence (Option 1) potentially help address the driver shortage for:

	Yes	No	Don't know
bus operators?	X		
coach operators?	X		
HGV operators?			X

Explain why you think this?

The current driver shortage arose for a number of reasons, but a key one was the delays in processing provisional applications at DVLA during summer 2021. This was during the COVID-19 pandemic when several factors combined to result in severe delays. At that time, straightforward applications were taking around two months to process. Thousands of applicants were lost from the recruitment pipeline. The agency worked hard to improve the situation and brought processing times for straightforward vocational applications down to reasonable levels by early 2022. We believe that straightforward applications are currently being (and have been for some time) processed within around 5 working days. With post each way, drivers receive their provisional licence around two weeks after posting.

Around 20% of vocational provisional applications are not straightforward as medical or conduct matters need to be considered. Such applications can take several months to process. In some cases, the length of time is outside of DVLA's control as the Agency needs to wait for doctors and other medical professionals to provide the information needed to make a licensing decision.

The industry currently loses a significant number of applicants who accept a job offer but then take up a role in another sector due to the lag between the offer and receiving their provisional licence, and the fact that many other sectors can offer the applicant an immediate start.

If these applicants were not lost, it would be much easier for operators to fill vacancies, reduce shortages, maintain and grow driver numbers.

This problem became a lot worse during the pandemic when straightforward applications were taking two months or more to process. Changing the legislation to allow candidates to start on their vocational training and testing journey whilst they are awaiting their provisional would help the current situation but also build-in protection for future pandemics or other circumstances when long delays occur at DVLA.

In the run up to the CPT / DfT PSV Driver Shortage Summit in November 2022, driver vacancy surveys questions included consideration of the number of applicants that had been lost from the recruitment process (accepted a job offer but then pulled out) for a variety of reasons, including delays with their provisional licence. The results from our June and September 2022 surveys showed that the members supplying data lost around 130 applicants each quarter due to delays with provisional licences over a three-month period; these members employ (an average across the two surveys of) around 38,000 drivers. If we assume the members responding are representative of the wider sector, which employs around 100,000 drivers, we can factor up the quarterly number to around 350; this would be around 1500 per annum. However, not all respondents to the surveys were able to supply data in relation to these questions and so we believe that these numbers significantly understate the true loss of recruits for operators. Based on an analysis of the operators that provided data, we believe that the 1500 figure may only represent around a third of the true position.

It is reasonable to assume that our proposal if implemented would not lead to the retention of all the applicants as some may have medical issues that mean that they are not suitable, or they may just decide not to pursue a career as a bus/coach driver for some other reason, but we believe a large proportion of them could be saved and that they would become operational (whereas they are currently being lost). We also believe that the 1500 may be an underestimate as those withdrawing may be classified under another heading (such as 'reason unknown' or 'offered a job elsewhere') when the underlying reason is really due to a delay in obtaining their Cat D provisional licence. It is also worth noting that many thousands of drivers will be lost from the HGV recruitment process for the same reason so legislative change benefitting both sectors could make an enormous difference to the overall driver shortage.

Q73. What, if any, other comments do you have on Option 1?

We should prefer option 2, as it offers increased flexibility and improved opportunity to reduce driver shortages.

It is noteworthy that a category B licence holder can drive a PSV which is over 30 years old, non-commercially with up to 8 passengers. This appears to cover any category B licence holder, regardless of age. <https://assets.publishing.service.gov.uk/media/636d26cee90e076198ef2fce/inf52-large-vehicles-you-can-drive-using-your-car-or-lorry-licence.pdf>

Removal of the requirement to hold a provisional licence before undertaking the theory, case study, practical demonstration and off-road manoeuvres: Option 2

Q74. In your view should a person be able to undertake the theory, case study, practical demonstration and off-road manoeuvres modules of the DCPC test (Option 2) before receiving a provisional:

	Yes	No	Don't know
bus entitlement?	X		
coach entitlement?	X		
HGV entitlement?	X		

Explain why you think this (including any examples and evidence)?

We set out the case for Option 1 above under the same question for Option 1, though we have repeated the information here for completeness.

Option 2 offers the additional benefit of allowing a trainee to practice and take the off-road manoeuvres test (Module 3a). This allows further progress to be made whilst the provisional licence is being processed.

As we explained earlier, some applications can take several months to process so making as much progress as possible with the candidate is really important.

As covered later, we don't believe that allowing a candidate to practice and take the off-road modules presents any significant safety risk, and the candidate would not be permitted to drive on public roads. The medical would still be undertaken before the candidate starts training/testing and the operator would review the completed form and note anything of concern identified by the doctor.

As covered earlier, there would be a risk to the operator inasmuch as they might pay for the candidate to undertake the off-road modules, only for a decision DVLA to be subsequently made that a provisional licence cannot be granted due to a conduct issue; the operator would then forfeit their investment in the candidate. However, they would be able to decide, based on their assessment of that risk whether to go ahead with the training and testing for the off-road modules prior to a provisional licence being granted. Many of our members, employing tens of thousands of drivers, have indicated to us that they would be willing to take that risk, due to the benefits of doing so.

The current driver shortage arose for a number of reasons, but a key one was the delays in processing provisional applications at DVLA during summer 2021. This was during the COVID-19 pandemic when several factors combined to result in severe delays. At that time, straightforward applications were taking around two months to process. Thousands of applicants were lost from the recruitment pipeline. The agency worked hard to improve the situation and brought processing times for straightforward vocational applications down to reasonable levels by early 2022. We believe that straightforward applications are currently being (and have been for some time) processed within around 5 working days. With post each way, drivers receive their provisional licence around two weeks after posting.

Around 20% of vocational provisional applications are not straightforward as medical or conduct matters need to be considered. Such applications can take several months to process.

In some cases, the length of time is outside of DVLA's control as the Agency needs to wait for doctors and other medical professionals to provide the information needed to make a licensing decision.

The industry currently loses a significant number of applicants who accept a job offer but then take up a role in another sector due to the lag between the offer and receiving their provisional licence, and the fact that many other sectors can offer the applicant an immediate start.

If these applicants were not lost, it would be much easier for operators to fill vacancies, reduce shortages, maintain and grow driver numbers.

This problem became a lot worse during the pandemic when straightforward applications were taking two months or more to process. Changing the legislation to allow candidates to start on their vocational training and testing journey whilst they are awaiting their provisional would help the current situation but also build-in protection for future pandemics or other circumstances when long delays occur at DVLA.

In the run up to the CPT / DfT PSV Driver Shortage Summit in November 2022, driver vacancy surveys questions included consideration of the number of applicants that had been lost from the recruitment process (accepted a job offer but then pulled out) for a variety of reasons, including delays with their provisional licence. The results from our June and September 2022 surveys showed that the members supplying data lost around 130 applicants each quarter due to delays with provisional licences over a three-month period; these members employ (an average across the two surveys of) around 38,000 drivers. If we assume the members responding are representative of the wider sector, which employs around 100,000 drivers, we can factor up the quarterly number to around 350; this would be around 1500

Q74. In your view should a person be able to undertake the theory, case study, practical demonstration and off-road manoeuvres modules of the DCPC test (Option 2) before receiving a provisional:

per annum.

It is reasonable to assume that our proposal if implemented would not lead to the retention of all the applicants as some may have medical issues that mean that they are not suitable, or they may just decide not to pursue a career as a bus/coach driver for some other reason, but we believe a large proportion of them could be saved and that they would become operational (whereas they are currently being lost). We also believe that the 1500 may be an underestimate as those withdrawing may be classified under another heading (such as 'reason unknown' or 'offered a job elsewhere') when the underlying reason is really due to a delay in obtaining their Cat D provisional licence. It is also worth noting that many thousands of drivers will be lost from the HGV recruitment process for the same reason so legislative change benefitting both sectors could make an enormous difference to the overall driver shortage.

Q75. In your view if a driver has an existing health condition, should a decision by the Driver and Vehicle Licensing Agency be reached as to whether that health condition will prevent the person from holding a vocational driving licence before allowing that person to undertake any of the modules set out in Option 2 for:

	Yes, the decision should be reached before a person can undertake any of the modules	No, the decision can be made after the person undertakes some or all of the modules	Don't know
bus driving?		X	
coach driving?		X	
HGV driving?		X	

Explain why you think this (including any examples and evidence)?

We don't believe that any health condition that would be identified as part of the driver medical assessment would affect a candidate's ability to undertake modules 1, 2, or 4. Some might argue that a candidate should not be allowed to undertake module 3a until DVLA has assessed any health conditions.

However, it should be noted that all bus and coach driver applicants have a valid Category B licence and will therefore be permitted to drive vehicles up to 3500kg in weight at speeds of up to 70mph. Carrying out the off-road manoeuvres in a low-speed, controlled environment, is likely to be very safe in comparison.

We have already set out the reasons why operators are willing to invest in trainees despite the risk that an individual's application might be rejected by DVLA following assessment of any health conditions.

Q76. In your view should a decision be reached in respect to whether a person's past conduct should prevent them from holding a vocational licence before a person can undertake any of the modules set out in Option 2 for:

	Yes, a decision should be reached before a person can undertake any of the modules	No, matters relating to a driver's conduct can be investigated while a person undertakes some or all of the modules	Don't know
bus driving?		X	
coach driving?		X	
HGV driving?		X	

Explain why you think this (including any examples and evidence)?

We should highlight that the current arrangements are designed to protect the public but the driver would have no contact with the public whilst undertaking the Option 2 modules.

There would be a risk to the operator insomuch as they might pay for the candidate to undertake the off-road modules, only for a decision DVLA to be subsequently make that a provisional licence cannot be granted due to a conduct issue; the operator would then forfeit their investment in the candidate. However, they would be able to decide, based on their assessment of that risk whether to go ahead with the training and testing for the off-road modules prior to a provisional licence being granted. Many of our members, employing tens of thousands of drivers, have indicated to us that they would be willing to take that risk, due to the benefits of doing so. Refusals based on conduct are relatively rare.

The PSV non-driving conduct restrictions do not apply to HGV.

Removal of the requirement to hold a provisional licence before undertaking the theory, case study, practical demonstration and off-road manoeuvres: Option 2

Q77. If Option 2 is implemented would you have any 'health and safety' concerns?

No

Removal of the requirement to hold a provisional licence before undertaking the theory, case study, practical demonstration and off-road manoeuvres: Option 2

Q80. If Option 2 is implemented do you believe there will be benefits for the bus, coach and HGV sectors?

Yes, for all 3 sectors

Option 2 all 3 benefits

Q87. Which, if any, of the following benefits do you think could be achieved by implementing Option 2?

	Drivers could begin their career straight away	The length of time it takes to train new drivers could be shortened	Other benefits
For buses	X	X	X
For coaches	X	X	X
For HGVs	X	X	X

If 'other benefits' explain what benefits.

Currently, the process would usually be that an operator interviews a candidate and makes a job offer if they think they are suitable. If the candidate accepts the job offer, they would then undergo a medical and complete an application for a provisional licence. This is posted to DVLA, the Agency undertakes various checks and then issues a provisional licence if everything is satisfactory; this is posted back to the applicant. The applicant advises the operator, and a start date is arranged. They arrange tests for modules 1 & 2. Module 1 is made up of a theory test (multiple-choice questions - Mod 1a) and a hazard perception test (Mod 1b). Once these are passed, tests for Modules 3 & 4 can be arranged. Candidates must pass module 3a before undertaking module 3b. There is therefore considerable sequencing and the waiting time for each module can add considerably to the overall period between interviewing a candidate and them becoming operational as a driver.

Many larger operators have a delegated driving examiner (or several examiners) and the arrangement of tests is easier. Smaller operators are reliant on DVSA for modules 1 & 2, and in some cases 3a and 4. All small operators are reliant on DVSA for Module 3b (the on-road practical test). Based on data supplied by DVSA for the period April to September 2023, average waiting times varied by module and location.

Across all test centres, average wait times for Module 1a was 23 days but was up to 84 days at some test centres. The average waiting time was 4 weeks or more at 88 of the 150 test centres. Average wait times for Module 3b tests were slightly better.

The majority of Module 3a tests are now provided by the private sector and there is reasonable availability in most areas. As mentioned above, most smaller operators are reliant on DVSA for Module 3b – the on-road practical test. Waiting times for this part of the test were pretty good at an average of 4.1 days. However, waiting times were up to 11 days at some centres and were two weeks or more at 7 of the 43 test centres where tests were available.

Average waiting times for Module 2 were slightly better than for Module 1 – an average of 19.5 days across all test centres but up to 63 days at some. Average waiting times were 4 weeks or more at 58 of the 139 test centres offering the test.

Module 4 can be booked once Module 2 is passed (as above). Average waiting times for Module 4 tests provided by DVSA were only 2.7 days and these tests were available within two weeks at the vast majority of test centres, although data was only available for 35 centres, suggesting that in most cases, operators utilise private-sector provision.

Waiting times were considerably longer during the COVID-19 pandemic and for periods, tests were not available at all. However, even based on the waiting times from last year as set out above, the importance of being able to get on with the training and testing process as soon as possible is clear. The initial tests cannot be booked until the provisional licence is issued so the total time for bringing a new driver through the process extends an already lengthy period.

If the proposal were implemented, the operator would not need to wait for the provisional licence to be granted and could therefore employ the candidate and begin the training and testing process. Drivers could therefore begin their career straight away. We have ticked 'The length of time it takes to train new drivers could be shortened' box in all cases. We believe it would be more accurate to say that 'the length of time between a candidate accepting the offer of a job from the operator and that individual becoming operational as a driver would be shortened'. The actual overall training time is unlikely to be affected.

The key 'other' benefit is that the number of candidates who are offered a job, accept the role but then never commence training would be reduced. We cover this in more detail in our response to later questions.

The addition of Module 3a to the modules that could be undertaken whilst awaiting a vocational provisional (over Option 1) could further shorten the time between interviewing a candidate and them becoming

Q87. Which, if any, of the following benefits do you think could be achieved by implementing Option 2?

operational as more progress could be made before the provisional is issued.

We can't comment with certainty regarding the HGV sector as we have no expertise in that area.

Removal of the requirement to hold a provisional licence before undertaking the theory, case study, practical demonstration and off-road manoeuvres: Option 2

Q88. In your view would insurance premiums be negatively affected if a driver undertook the off-road manoeuvres module of the DCPC test before they receive a driver entitlement?

No

Insurance premiums

Q89. Explain why you think this (providing evidence and examples).

Comments:

67% of respondents to a CPT survey which asked about increased insurance premiums in relation to the ability to undertake off road manoeuvres prior to obtaining a vocational provisional licence did not think that insurance premiums would be impacted.

7% did not know.

Removal of the requirement to hold a provisional licence before undertaking the theory, case study, practical demonstration and off-road manoeuvres: Option 2

Q90. In your view could the:

	Yes	No	Don't know
bus driver shortage potentially be reduced if a person could undertake the modules set out in Option 2 before receiving a provisional licence?	X		
coach driver shortage potentially be reduced if a person could undertake the modules set out in Option 2 before receiving a provisional licence?	X		
HGV driver shortage potentially be reduced if a person could undertake the modules set out in Option 2 before receiving a provisional licence?			X

Explain why you think this.

The current driver shortage arose for a number of reasons, but a key one was the delays in processing provisional applications at DVLA during summer 2021. This was during the COVID-19 pandemic when several factors combined to result in severe delays. At that time, straightforward applications were taking around two months to process. Thousands of applicants were lost from the recruitment pipeline. The agency worked hard to improve the situation and brought processing times for straightforward vocational applications down to reasonable levels by early 2022. We believe that straightforward applications are currently being (and have been for some time) processed within around 5 working days. With post each way, drivers receive their provisional licence around two weeks after posting.

Around 20% of vocational provisional applications are not straightforward as medical or conduct matters need to be considered. Such applications can take several months to process. In some cases, the length of time is outside of DVLA's control as the Agency needs to wait for doctors and other medical professionals to provide the information needed to make a licensing decision.

The industry currently loses a significant number of applicants who accept a job offer but then take up a role in another sector due to the lag between the offer and receiving their provisional licence, and the fact that many other sectors can offer the applicant an immediate start.

If these applicants were not lost, it would be much easier for operators to fill vacancies, reduce shortages, maintain and grow driver numbers.

This problem became a lot worse during the pandemic when straightforward applications were taking two months or more to process. Changing the legislation to allow candidates to start on their vocational training and testing journey whilst they are awaiting their provisional would help the current situation but also build-in protection for future pandemics or other circumstances when long delays occur at DVLA.

In the run up to the CPT / DfT PSV Driver Shortage Summit in November 2022, driver vacancy surveys questions included consideration of the number of applicants that had been lost from the recruitment process (accepted a job offer but then pulled out) for a variety of reasons, including delays with their provisional licence. The results from our June and September 2022 surveys showed that the members supplying data lost around 130 applicants each quarter due to delays with provisional licences over a three-month period; these members employ (an average across the two surveys of) around 38,000 drivers. If we assume the members responding are representative of the wider sector, which employs around 100,000 drivers, we can factor up the quarterly number to around 350; this would be around 1500 per annum.

It is reasonable to assume that our proposal if implemented would not lead to the retention of all the applicants as some may have medical issues that mean that they are not suitable, or they may just decide not to pursue a career as a bus/coach driver for some other reason, but we believe a large proportion of them could be saved and that they would become operational (whereas they are currently being lost). We also believe that the 1500 may be an underestimate as those withdrawing may be classified under another heading (such as 'reason unknown' or 'offered a job elsewhere') when the underlying reason is really due to a delay in obtaining their Cat D provisional licence. It is also worth noting that many thousands of drivers will be lost from the HGV recruitment process for the same reason so legislative change benefitting both sectors could make an enormous difference to the overall driver shortage.

Q91. What, if any, other comments do you have on Option 2?

The greater flexibility afforded by option 2 (compared to option 1) would be useful as it would maximise the progress a candidate could make before being issued with a provisional.

Licences can be granted several months after application and it is therefore important to make the most of that time.

It is noteworthy that a category B licence holder can drive a PSV which is over 30 years old, non-commercially with up to 8 passengers. This appears to cover any category B licence holder, regardless of age. <https://assets.publishing.service.gov.uk/media/636d26cee90e076198ef2fce/inf52-large-vehicles-you-can-drive-using-your-car-or-lorry-licence.pdf>

Your preferred option

Q92. Which option would you support implementing for:

	Option 1	Option 2	Neither option and maintain current position	Another option
buses?		X		
coaches?		X		
HGVs?		X		

Explain why you think this and if 'another other option' what is this?

We prefer option 2 (compared to option 1) for the reasons set out in our response to Q.91 and earlier questions.

We do not represent the HGV sector. Whilst that sector may not wish to take the option up, we don't see any reason why the opportunity should not be available.

Q93. Which option in your view could help:

	Option 1	Option 2	Neither option and maintain current position	Another option
bus operators the most?		X		
coach operators the most?		X		
HGV operators the most?				

Explain why you think this and if 'another option' explain what that is.

We have already set out the additional benefits of Option 2.

We don't think that the benefits differ across bus, coach and truck but would reiterate that we don't represent and don't have particular knowledge of the truck sector.

Q94. Which option in your view has the most 'health and safety' risks?

Neither option has increased health and safety risks

Explain why you think this?

We don't believe there are any particular health & safety risks associated with Option 2, or indeed, Option 1.

A CPT member survey provided that:

- In relation to Option 1, all CPT members who responded to a survey stated that they deemed health and safety concerns as low or very low. These respondents are the employers of 11909 drivers.
- In relation to Option 2, all CPT members who responded to a survey stated that they deemed health and safety concerns as low or very low. These respondents are the employers of 11909 drivers.
- One CPT member noted that "no candidates would be allowed to move a PCV without any certainty that they are considered fit to do so, either medically or via Traffic Commissioner checks."

We have previously explained [response to question;]. In your view if a driver has an existing health condition, should a decision by the Driver and Vehicle Licensing Agency be reached as to whether that health condition will prevent the person from holding a vocational driving licence before allowing that person to undertake any of the modules set out in Option 2 for;], that all bus and coach driver applicants have a valid Category B licence and will therefore be permitted to drive vehicles up to 3500kg in weight at speeds of up to 70mph. Carrying out the off-road manoeuvres in a low-speed, controlled environment, is likely to be very safe in comparison.

Q95. Which option in your view would have the greatest negative impact on insurance premiums?

Neither option has a negative effect on insurance premiums

Explain why you think this?

Many larger bus operators are self-insured so they don't pay insurance premiums; such operators provide the majority of bus services in the UK.

Coach operators pay premiums based on various risk factors associated with their individual business. An ability for trainees to undertake the off-road modules whilst awaiting a provisional licence would not translate into higher premiums.

Insurers also take a risk-based approach to premiums. Given the very low risks associated with either option, we don't believe that they would increase premiums even if the operators they insured took candidates through the off-road modules before their provisional licence had been issued.

Impact assessment

Q97. Do you agree or disagree that the:

	Agree	Disagree	Think that there will be no impact	Don't know
50km regular service restriction proposal will increase operating costs for the bus sector?		X		
50km regular service restriction proposal will increase operating costs for the coach sector?		X		
50km regular service restriction proposal will increase operating costs for the HGV sector?		X		
test requirements proposal will increase operating costs for the bus sector?		X		
test requirements proposal will increase operating costs for the coach sector?		X		
test requirements proposal will increase operating costs for the HGV sector?		X		

Why do you think this (giving examples or evidence if you can)?

There would be a small cost where operators take on a candidate, provide them with training and testing but then their application for a provisional licence is refused and the investment is forfeited. Based on current percentages, this is only likely to happen in a small number of cases.

However, operators have been short of drivers since the summer of 2021 and there is a significant actual cost associated with such shortages. These include the need to pay staff overtime, hire in agency drivers, and increase expenditure on recruitment, including advertising.

Driver shortages also result in significant opportunity costs: services not operated mean that passengers complain and/or lose confidence in services, leading to reduced levels of travel by bus and coach. Operators have had to reduce the levels of service they operate. This reduces the levels of income that operators can earn and spreads overhead costs over a smaller operation. Data from our members showed reduced driver requirements resulting from reductions in service levels through the driver shortage crisis.

Data provided to CPT by its members in quarterly driver shortage surveys provided that operators, in their efforts to deal with the shortage, had:

- Reduced the number of local bus services operated.
- Reduced the frequency of bus services operated.
- Reduced the number of school services operated.
- Reduced the number of vehicles available for private hire work.
- Reduced tour programmes.
- Reduced the amount of rail replacement work being undertaken.
- Introduced better shift patterns, and other terms of employment.

An example of how much of an impact that operators' efforts have had was that between February and May 2023, operators reduced their driver requirement by 2.2%, though managed to increase the number of drivers employed by 3.7%. At that time, the bus driver shortage reduced from 10.7% to 5.2% between the two surveys. Service reduction has seen a regular trend over recent years. This would indicate that driver shortages could be greater than indicated.

We don't profess to have any expertise in the HGV sector but we cannot think how that sector would be any different. The HGV sector already benefits from full flexibility for 18- & 19-year-old drivers.

Q98. What impact would you expect that the:

	Increase in wages	No impact on wages	Decrease in wages	Don't know
50km regular service restriction proposal for bus drivers would have on driver wages in the short term?		X		
50km regular service restriction proposal for coach drivers would have on driver wages in the short term?		X		
50km regular service restriction proposal for HGV drivers would have on driver wages in the short term?		X		
test requirements proposal for bus drivers would have on driver wages in the short term?		X		
test requirements proposal for coach drivers would have on driver wages in the short term?		X		
test requirements proposal for HGV drivers would have on driver wages in the short term?		X		

Why do you think this (give examples or evidence if you can)?

We don't believe that implementation of the proposals, or indeed or the implementation of our proposal to allow 18- and 19-year-olds to drive any service would have an impact on driver wages. The labour market remains competitive and implementation of the proposals is likely to help operators reduce shortages and rebuild post-pandemic; there has been little opportunity for rebuilding to date.

Q99. What impact would you expect that the:

	Increase in wages	No impact on wages	Decrease in wages	Don't know
50km regular service restriction proposal for bus drivers would have on driver wages in the long term?		X		
50km regular service restriction proposal for coach drivers would have on driver wages in the long term?		X		
50km regular service restriction proposal for HGV drivers would have on driver wages in the long term?		X		
test requirements proposal for bus drivers would have on driver wages in the long term?		X		
test requirements proposal for coach drivers would have on driver wages in the long term?		X		
test requirements proposal for HGV drivers would have on driver wages in the long term?				X

Why do you think this (give examples or evidence if you can)?

Driver shortages have constrained growth and led to reduced levels of service provision. The proposals if implemented would streamline recruitment and enable operators to recruit younger drivers. This is likely to lead to increases in service provision rather than operators maintaining services at their reduced levels. Increased service provision would mean that more drivers would be required.

The Government's Bus strategy and the need to reduce carbon should lead to growing service levels, that will be enabled by the proposed changes. It is highly unlikely that wages would fall in an environment where operators are increasing service provision.

Removing the 50 km restriction will largely benefit the coach sector and is unlikely to have any impact on bus or HGV sectors.

Q100. Do you agree or disagree with the statement that the:

	Agree	Disagree	Think that there will be no impact	Don't know
50km regular service restriction proposal will decrease bus fares?			X	
50km regular service restriction proposal will decrease coach fares?			X	
test requirements proposal will decrease bus fares?			X	
test requirements proposal will decrease coach fares?			X	

Why do you think this (giving examples or evidence if you can)?

Wages have a significant influence on fares as they represent around 36.7% of costs [from CPT Cost Monitor report for June 2023]. However, as outlined above, we do not believe wages will be affected by implementation of the proposals. Implementation is unlikely to have any other significant effect on costs and is therefore unlikely to affect fares.

Q101. Do you agree or disagree with the service provision statement that the:

	Agree	Disagree	Think that there will be no impact	Don't know
50km regular service restriction proposal will increase bus service provision?			X	
50km regular service restriction proposal will increase coach service provision?	X			
test requirements proposal will increase bus service provision?	X			
test requirements proposal will increase coach service provision?	X			

Why do you think this (giving examples or evidence if you can)?

Driver shortages have constrained growth and led to reduced levels of service provision. The proposals if implemented would streamline recruitment and enable operators to recruit younger drivers. This is likely to lead to increases in service provision, reinstating service levels and enabling them to grow in line with the Government's bus strategy and the need to switch to more sustainable modes of transport like buses and coaches.

Q102. Overall, in your view, do you think that the impacts of these proposals would encourage or discourage people to switch from cars to:

	Encourage a lot	Encourage a little	No effect	Discourage a little	Discourage a lot	Don't know
buses?	X					
coaches?	X					

Why do you think this (giving examples or evidence if you can)?

The ability to recruit more drivers would lead to increases in service provision, enabling operators to provide more attractive services and meet demand. This would encourage more people to switch from cars.

Any other comments

Q106. Outline any other comments you may have.

This coordinated Confederation of Passenger Transport response is supported by relevant member committees, and by the "big 5" bus and coach operators, Arriva, First Bus, Go-Ahead, National Express and Stagecoach.