

RTITB response to DVSA Consultation - *Changes to HGV and bus driving tests and allowing car drivers to tow a trailer without an extra test*

About RTITB and our network

RTITB is an independent business owned by a charitable organisation. We operate schemes of accreditation, provide quality assurance services and run professional registers of trainers, operators and drivers, predominantly for the transport, warehousing and logistics sectors. Every year over 100,000 LGV drivers/forklift operators attend training courses accredited by RTITB. There are over 5000+ trainers on our Register of Professional Instructors. We accredit the workplace transport and vehicle training of 700+ sites across the UK working closely with commercial training providers, employers, local authorities, colleges, armed forces and prisons.

General Comments/Information

1. In order to form a response to the consultation that was representative of the views of the RTITB network (as described above) we ran an online survey. The survey was open for 15 calendar days.
2. 42% of responses were professional LGV drivers – 54% of these worked for a large business and 14% for a micro business.
3. 13% were commercial training organisations offering LGV licence acquisition/Driver CPC training – 5% of these worked for a large business and 56% for a micro business.
4. 10% were LGV trainers who delivering training 'in-house' for their employer's drivers/employees – 18% of these worked for a large business and 48% for a micro business.
5. Other respondents included representatives from Local Authorities and the MOD and Army, Transport Managers, recruitment agencies, HR Managers and warehouse managers and trainers.
6. A significant number (25%+) of respondents provided written comments that expressed anger and concern. They expressed a view that the consultation was a 'knee jerk' reaction to the driver shortage issue which was being put above road safety. They felt that as an industry that needs to professionalise this consultation (if implemented) would be a step away from professionalism rather than towards it. Many who raised concerns described large vehicles as 'dangerous' and that road users lives would be compromised by staging changes.

7. Many respondents took the opportunity to feedback on their concerns around poor pay and working conditions (hours, facilities and the treatment of drivers at delivery points, by the public and by their managers).

Responses to Questions

Question 3 - Have you encountered any problems in driver recruitment in the past 24 months?

Yes.

89.8% of respondents from the RTITB network said that the business they work in/for had encountered problems with driver recruitment in the last 24 months.

Question 4 -Are there any other areas related to driving test rules and licensing arrangements which may act as a barrier and discourage people from considering professional lorry driving as a career choice?

Yes.

Respondents from the RTITB network frequently mentioned the need for the two theory modules (module 1 – multiple choice and hazard perception test and module 2 - Driver CPC case study test) to be amalgamated into one single theory test.

Amalgamating these 2 tests would reduce the bureaucracy/administrative demands associated with the theory tests – booking and attending theory tests is very often stressful for learners, to go through this process twice is off putting for potential new driver entrants.

Removing the administration of two tests (booking process, data handling, results handling etc.) should also reduce the total cost to the learner of the theory tests. It would also mean any learners could reduce the amount of time lost to theory testing. If learners are in other jobs and looking to transition to the driving industry having to take time off work for 2 tests rather than 1 is another unnecessary deterrent.

Question 5 - To what extent do you agree or disagree with the proposal to remove the staging requirements for vocational driving licences?

Disagree

51% of respondents from the RTITB network disagreed or strongly disagreed with the proposal, whilst 45.2% agreed/strongly agreed with the proposal.

The majority of LGV drivers and commercial training provider respondents disagreed overall with the proposal whilst the majority of other respondents - in house LGV trainers, transport managers, HR managers etc. agreed with the proposal.

We feel that this proposal (if implemented) could significantly compromise road safety. A high level of skill and judgement is required to drive the different vehicle types. Experience needs to be gained driving category C vehicles (to get used to longer stopping distances, and turning circles for example) before moving to C+E vehicles. We recommend that longer duration and structured training will be needed to fully prepare candidates for test thereby increasing the pass rate in order to create DVSA examiner availability. Presenting candidates for test who have moved straight from category B to C+E will likely reduce the C+E pass rate unless the standard of training is adequately addressed – effectively changing the problem but not solving it. If training were structured, prescribed and effectively regulated then it is possible that staging could be safely removed.

Question 6 - To what extent do you agree or disagree that a driver who successfully passes a category C+E or D+E test should also be granted entitlement to drive a vehicle in categories C, C1+E and C or D1, D1+E and D respectively?

Strongly Agree

Question 7 - What benefits, costs, risks or dis-benefits do you think would result from this flexibility?

a) Do you think any benefits would result in this flexibility?

Yes - there will be a financial benefit to the learner.

b) Do you think any dis-benefits would result in this flexibility?

Yes – new C+E drivers will likely lack the necessary knowledge and skills needed to safely drive other LGV licence categories.

c) Do you think any costs would result in this flexibility?

Yes – C+E training will need to be more extensive and therefore longer (as the candidate has no prior large vehicle driving skills/experience) this will increase the cost of this training.

d) Do you think any risks would result in this flexibility?

Yes – road safety risk will increase as this approach will reduce the amount of ‘real-world’ large vehicle driving experience a new C+E driver has.

Question 8 - To what extent do you agree or disagree that drivers should still be able to take a category C test even if they have been granted entitlement to drive by passing a C+E test?

Strongly Agree

Question 9 - How much additional demand would you expect there to be if the staging requirement is removed?

Don't know - however the responses to our survey suggest that there is a lack of people wishing to be LGV drivers due to poor pay and working conditions, therefore it would follow that a significant upsurge in demand would not occur unless these issues are also addressed.

Question 11 - Do you consider there to be any concerns for road safety should the government implement this measure?

Yes

Unfortunately, in many cases, training is only delivered to get a learner to ‘pass the test’ - when this happens it means the new LGV driver lacks the critical knowledge and skills to be a safe driver. If staging is removed and training is not prescribed and improved it will lead to less skilled, inexperienced drivers being on the road, inevitably this will mean more road traffic incidents.

Question 13 - To what extent do you agree or disagree that the rules for qualified drivers accompanying provisional licence holders need to allow a C+E or D+E qualified driver to supervise a C or D provisional licence holder, without having taken a C or D test?

Agree

Question 14 - To what extent do you agree or disagree that the restriction which prevents a category C licence holder who is under 21 from holding provisional C+E entitlement until they have held their C licence for 6 months should continue?

Strongly Agree

Question 15 - To what extent do you agree or disagree with the proposal to enable the reversing manoeuvres and the coupling exercise to be conducted by an authorised third party?

Strongly Agree

Question 16 -Do you consider there to be any barriers for training organisations to provide an assessment?

No

Question 17 - Who do you think is best qualified to be authorised to assess the manoeuvres?

Existing or new HGV trainers being authorised – 44.2%

Only those trainers who are members of either of the two voluntary HGV training registers – 18.5%

Trainers who hold specific professional qualifications – 37.3%

Question 18 - What sort of scheme do you think would best support this arrangement?

Other

The comments made by respondents to our research made clear that DVSA must be involved in some formal capacity in any resulting scheme to support this arrangement.

Question 19 - Do you consider there to be any concerns for road safety should the government implement this measure?

No