

Title: Measures to address shortage of lorry drivers – removal of car and trailer (BE) tests IA No: DfTDMA226 RPC Reference No: RPC-DfT-5137(1). Lead department or agency: Department for Transport Other departments or agencies: Driver and Vehicle Standards Agency (DVSA)	Impact Assessment (IA)
	Date: 25/11/2021
	Stage: Consultation
	Source of intervention: Domestic
	Type of measure: Secondary Legislation
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Summary: Intervention and Options	RPC Opinion: Fit for Purpose
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Cost of Preferred (or more likely) Option (in 2019 prices)

Total Net Present Social Value	Business Net Present Value	Net cost to business per year	Business Impact Target Status Non-qualifying provision
NQ	NQ	NQ	

What is the problem under consideration? Why is government intervention necessary?

The haulage sector has been experiencing a chronic shortage of lorry drivers worldwide for some time, which is now considered an acute shortage within the UK of around 39,000 lorry drivers in June 2021 (Office of National Statistics (ONS) data). The coronavirus pandemic meant that driver testing had to be suspended for much of 2020, which is likely delaying entry of potential drivers to the industry. Furthermore, longer-term issues remain surrounding attracting and retaining drivers to the industry, such as: anti-social hours, poor diversity, relatively low pay, poor driver facilities and, based on ONS data, EU nationals returning home once pandemic restrictions eased. This affects all the logistics sector with risk in particular to the fresh food industry, medical supplies and fuel. Government intervention will only help in part to address this shortfall; wider measures from both government and industry to deal with ongoing recruitment and retention is underway.

What are the policy objectives and the intended effects?

This measure is one of several ways that the government is seeking to address the lorry driver shortage issue. The overall aim of this policy is to increase the number of lorry drivers within Great Britain by increasing the number of test slots available to drivers wishing to pass a lorry driving test. The intention of this legislation is to remove the need for driver licence category 'BE' (i.e. car and trailer) tests, which are currently required by car drivers who wish to tow a trailer. Doing so would free up qualified driving examiners who would instead be used to conduct additional lorry tests, creating up to 2,400 additional lorry test appointments each month. This will assist drivers to obtain faster test appointments, leading to more qualified drivers with lorry licences, thereby helping to reduce driver shortages. For car drivers, this will mean tests are no longer needed to tow a trailer (such as caravans or horse boxes). However, theory and practical training will continue to be recommended to help maintain driver safety on the roads. An accreditation scheme is also being developed with help from the trailer industry and training providers to further incentivise drivers to take up training.

Summary: Analysis & Evidence

Policy Option 1

Description: Take action to reduce lorry driver shortage

FULL ECONOMIC ASSESSMENT

Price Base	PV Base	Time Period	Net Benefit (Present Value (PV)) (£m)		
			Low: 0.0	High: 0.0	Best Estimate: 0.0

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	0.0	0.0	0.0
High	0.0	0.0	0.0
Best Estimate	0.0	0.0	0.0

Description and scale of key monetised costs by 'main affected groups'

The main cost of this legislation change relates to the potential impact on road safety, which is unmonetised. There is insufficient information to properly quantify the likely impacts of removing BE testing, although existing data has been analysed. There is also a break-even analysis section on the road safety impact.

Other key non-monetised costs by 'main affected groups'

Businesses - Familiarisation costs associated with removal of staging of category BE tests for trainers and prospective drivers wanting to get that licence. These costs are expected to be low, and based on Green Book guidance, we assume that the training industry is a competitive industry where the cost of such training is a reflection of their costs, and any time freed up due to the legislation change can be put to good use on other work.

Wider Society – Removing the requirement for a test could reduce the incentive for drivers to undertake training and could therefore have implications for competence of drivers to tow trailers safely. To address this, an industry-led accreditation scheme is being developed to establish an agreed approach towards non-statutory training which would apply to all motorists wishing to tow a trailer. This will operate alongside online guidance.

Car/van drivers won't be required to take a statutory car/van and trailer test which may incentivise uptake of trailer usage and, in that case, it may potentially increase the road safety risk. Drivers will be able to continue to use their GB licence abroad as visitors under international regulations. However, there is a risk that this regulation change could affect the mutual recognition of GB licences abroad and exchange arrangements currently negotiated.

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	0.0	0.0	0.0
High	0.0	0.0	0.0
Best Estimate	0.0	0.0	0.0

Description and scale of key monetised benefits by 'main affected groups'

Individual – reduction in fees from the removal of BE tests and its training requirements. This is not the main policy objective and has therefore not been included in the NPV, as the main objectives are assessed qualitatively. The main benefits are to prospective drivers, although some could be to businesses that are paying for their employees' training. There has been significant stakeholder engagement surrounding these uncertainties, with no definitive answers available.

Other key non-monetised benefits by 'main affected groups'

Wider society - The main benefits of this legislation is releasing DVSA's testing capacity to help clear their driving test backlog, which helps alleviate the lorry driver shortage and its subsequent negative economic impact. This cannot be monetised following Green Book guidance. Therefore, these impacts are assessed qualitatively, with the BE measure releasing around 37% of DVSA's capacity to focus on vocational tests. More detailed information can be found within the costs and benefits section. The vocational testing backlog had an 8-week average waiting time for a test at the beginning of September, relative to DVSA's 3-week target. Once the vocational test backlog is cleared, the extra testing capacity will be used to clear the car tests backlog, which has also built up due to the pandemic and various lockdowns, with the current waiting time for tests being an average of 17 weeks; DVSA's target waiting time for car driving tests is 7 weeks.

Key assumptions/sensitivities/risks

3.5%

This proposal assumes that the extra testing capacity from the removal of the requirement for BE in driving tests will be met by demand for vocational tests and that this will lead to increases in numbers of drivers entering the industry. It also assumes that there is capacity within the training industry to undertake vocational training.

The incentives for drivers to build skills and experience, and/or undertake training to the benefit of road safety, can be provided through testing, or by other measures such as an accreditation scheme. Statistics are not available to show directly the effect of making such changes, and the statistical evidence available is not able to capture quantitatively the full set of potential effects. The overall effect of these changes on incentives for drivers to build skills and experience is therefore not clear cut, but is likely to be small in scale due to the relatively small share of drivers likely to be involved.

An industry-led accreditation scheme is being developed to provide a standardised non-statutory training approach for all motorists who wish to tow for business and leisure, not just for those who have gained a licence since 1997, prior to which no test was required. This scheme, which is aimed at mitigating the potential impact on road safety, will promote the importance of getting professional car and trailer training, thereby enhancing road safety standards by delivering the specific skills that drivers who tow need. Online guidance will also provide information on learning to tow and towing safely and remind motorists of the need to carry out trailer safety checks.

Any further measures that attempt to increase testing or get additional lorry drivers into the industry will lessen the impact, and possibly the need, for this measure. The change in the testing regime may also have further implications regarding the mutual recognition of GB licences abroad. All of these risks will be monitored and reviewed through the Post Implementation Review (PIR) plan, 3 years and 5 years after the policy is implemented.

BUSINESS ASSESSMENT (Option 1)

Direct impact on business (Equivalent Annual) £m:			Score for Business Impact Target (qualifying provisions only) £m: NQ
Costs:	NQ	Benefits: NQ	Net: NQ

1.0 Policy Rationale

Policy background

1. The Driver and Vehicle Standards Agency (DVSA) is responsible for carrying out driving tests, including for people who want to drive cars, lorries, buses and coaches. The legislation defining those tests is contained in Part III of The Motor Vehicles (Driving Licences) Regulations 1999, which is underpinned by Part III of Road Traffic Act 1988. Directive 2000/56 EC informed the content and conduct of the tests.
2. Currently, car drivers (category B) who wish to tow a trailer above a certain maximum authorised mass (MAM)¹ must pass a test, in a car and trailer combination, known as category BE. Some drivers, who passed their category B tests before 1 January 1997, can do this by virtue of acquired rights; these drivers can tow a car and trailer combination up to 8,250kg MAM. Drivers who passed their test on or after 1 January 1997 can:
 - a. drive a car or van up to 3500kg maximum authorised mass (MAM), towing a trailer up to 750 kg MAM;
 - b. tow a trailer over 750kg MAM as long as the combined MAM of the trailer and towing vehicle is no more than 3500kg MAM. The legislation change in option 1 looks to remove the need for a BE statutory test.
3. Tests are undertaken by DVSA, along with a small number of delegated examiners (authorised examiners for emergency services). During the three years from 2017/18 to 2019/20, there were some 29,400 BE tests conducted, with pass rates for BE tests being some 70% in the latest years.
4. This impact assessment explores the proposal to remove the statutory test for cars towing a heavy trailer. The reason for doing so is to increase testing capacity of DVSA driving examiners as a result of HGV driver shortages. The current shortage of 39,000 lorry drivers (ONS data June 2021) has been exacerbated by:
 - a number of drivers retiring or not returning (average age of lorry drivers is in their fifties² which means that many will be approaching retirement in the next few years) and approximately 12,000 EU drivers leaving the UK,
 - the growth in demand with reopening of the economy after pandemic restrictions,
 - the backlog of tests as a consequence of DVSA having to stop testing for six months due to the pandemic, and
 - deeper recruitment issues around anti-social hours, relatively low pay, poor diversity and, poor driver facilities, which remain a hindrance to attracting a new generation of recruits and retaining existing drivers.
5. Estimates vary about the precise level of the shortfall. Department for Transport (DfT) analysis of ONS figures indicate an acute shortage of lorry drivers estimated at 39,000 lorry drivers in June 2021³ relative to June 2019.
6. The importance of towing safely has been highlighted by the Government's Trailer Safety Statutory Report⁴ and the Tow Safe For Freddy campaign, which has been publicised by DfT and DVSA.

¹ The weight of a vehicle or trailer including the maximum load that can be carried safely when it's being used on the road – at [Vehicle Weights Explained](#) on gov.uk

² <https://www.returnloads.net/lorry-driver-shortage/>

³ Fall in HGV drivers largest among middle-aged workers - Office for National Statistics (ons.gov.uk)

⁴ Trailer safety report - GOV.UK (www.gov.uk)

BE tests

7. A BE⁵ test is a driving test in a car and trailer combination. It lasts for around 90 minutes with at least 50 minutes on-road driving time and consists of an eyesight check, “show me, tell me” vehicle safety questions, practical elements in reversing, general and independent driving and uncoupling/recoupling the trailer as if this is not done correctly, the trailer can part company with the towing vehicle. The test also covers areas such as driving the vehicle and trailer combination, checking loads and reversing. The trailer must be a closed box, such as a horsebox, be around the same width and height as the car and have a maximum authorised mass (the limit of how much the trailer can weigh when it is loaded) of at least 1,000kg. It was introduced in January 1997 as a result of European legislation - Council Directive 91/439/EEC of 29 July 1991⁶.
8. A summary table of the top 10 faults which result in candidates failing their car and trailer test (described by DVSA as “serious” and “dangerous” under their test procedures) for the period 2016/17 to 2019/20 can be found in Annex A. Of these, reversing and coupling/re-coupling the trailer account for most faults, and by “manoeuvre” group reversing and reverse parking at 17% and uncoupling/coupling at 13%.
9. Prior to January 1997, when the Motor Vehicles (Driving Licences) Regulations 1996 came into force (they were later consolidated into the Motor Cars (Driving Licences) Regulations 1999, which are still in force), drivers who passed a car test were granted the entitlement to also tow a trailer. Since then, anyone wishing to drive a car and heavy trailer combination must take and pass a BE test.
10. If the requirement to take a test to drive a car and heavy trailer combination were removed, drivers would be permitted to drive such a combination on a category B (car) licence without having to take a further BE test. This would free up examiners to take extra lorry tests.
11. There are, on average, some 29,000 BE tests conducted per year. It is estimated that this measure could result in up to 2,400 additional lorry tests per month⁷. As announced in September 2021, DVSA had already implemented operational changes to free up capacity to increase the number of lorry test slots. Delivery of BE tests had already been reduced by up to 66% from August 2021 onwards, which is before the start of the appraisal period, but is reflected within the Option 0 ‘Do nothing’ scenario. The impact of Option 1 of regulating includes everything from the announcement of the measure of removing BE test in September, with the subsequent reduction in demand for BE tests, and there being no BE tests being offered from October onwards. This regulatory measure will lead to a lower improvement to DVSA’s testing capacity due to the operational measures which are already in place but will give certainty to drivers. The extra testing capacity will be used, after the lorry testing backlog has been cleared, to clear the car test backlog, where the current waiting time for a test is 17 weeks, rather than DVSA’s goal of 7 weeks. Once these testing backlogs are cleared, DVSA will use examiner resource to reach a desired equilibrium level where their current targeted waiting times, of 7 weeks for a car test and 3 weeks for a vocational test, are achieved.

Problem under consideration

12. The country is currently facing an acute shortage of lorry drivers, coupled with a long backlog of tests for driving licences that has been exacerbated by the recent lockdowns to deal with the COVID-19 pandemic. The lorry driver shortage has been a long running issue but has reached a critical point due to a combination of factors that have exacerbated the issue within the last 18 months. ONS

⁵ [Car and trailer driving test - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/car-and-trailer-driving-test)

⁶ [EUR-Lex - 31991L0439 - EN - EUR-Lex \(europa.eu\)](https://eur-lex.europa.eu/eli/dir/1991/439/oj)

⁷ DVSA modelling data

estimate 12,000 EU drivers left the UK between March 2020 and 2021⁸. In addition, DVSA were unable to carry out as many tests as usual due to various lockdowns caused by the COVID-19 pandemic. These factors were in addition to many UK drivers leaving the industry through retirement, poor working conditions and facilities, and a lack of new drivers entering the labour market. Other factors are likely to affect the demand for lorry drivers, such as the reopening of the economy from the easing of pandemic restrictions during the summer onwards and the growth in aggregate demand in the run up to Christmas.

13. The lorry driver shortage is having a negative impact on the rest of the economy, where certain industries' supply is struggling to meet demand and causing delays and shortages. The industry could not meet the short-run supply of labour from seasonal workers or recruit quickly enough to meet demand. The vocational testing backlog is expected by DVSA's forecasts to take up until June 2022 to be cleared, without any mitigation attempts under the current legislation on driver testing. This will be insufficient in restoring the number of drivers required to keep goods moving around the country.
14. The aim of the change in regulation is to reduce elements in the driving test process, where this can be achieved. This is intended to increase the capacity of DVSA's examiners to enable them to clear the testing shortfall more quickly, thereby helping to alleviate the lorry driver shortages and its associated negative impacts. DVSA's modelling predicted that if the requirement for BE testing was removed from September 2021, along with other measures such as the removal of "staging" to acquire a lorry licence by December 2021, and approving third party examiners to test the off-road manoeuvres part of the lorry test by November 2021, it would likely be able to clear the backlog of vocational tests by December 2021. This would ease the pressures caused by driver shortages by allowing a larger inflow of new drivers with vocational licences (which are the licences needed to drive lorries) into the industry.
15. A number of areas of the economy have reported a struggle to secure drivers, but it has been felt most acutely in fresh food delivery which operates on tight timings and margins which represented around 19% of all goods lifted during 2020⁹. Securing supply is particularly acute for smaller and rural retailers and businesses who rely on regular deliveries in order to offer their services, which can be an issue, due in part, to such factors as access to distribution hubs. If not addressed, the industry states that the shortage of drivers has the potential to affect the delivery of goods within the UK¹⁰.
16. The road haulage sector is integral to the smooth functioning of the UK economy and its supply chains, moving 1.4bn tonnes of goods domestically in 2019¹¹. Additionally, the sector is also a key contributor to the UK economy contributing £13.6bn gross value added in 2019¹².
17. The haulage sector is highly connected within domestic supply chains and is a primary mode, moving 90% of the goods in the UK¹³. As a result of this, the problem of the driver shortage can have far ranging impacts across other sectors. This creates a high potential cost to society, with risks to critical supply chains for food, medicines, and other products. Government intervention may be justified to mitigate these risks.

⁸ ONS analysis, available at:

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/adhocs/13633lorrydriversbynationality>

⁹ <https://www.gov.uk/government/statistics/road-freight-statistics-2020>

¹⁰ [UK truck driver shortage 'reaches crisis point' - Lloyd's Loading List \(lloydsloadinglist.com\)](https://www.ons.gov.uk/government/statistics/road-freight-statistics-2020)

¹¹ DfT, Road Freight Stats

¹² ONS, Non-financial business economy stats

¹³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945362/tsqb0403.ods

Rationale for intervention

18. Government intervention may be required within the current climate where there is a backlog in tests for vocational licences due to the period of suspended testing during the COVID-19 pandemic and the acute shortage of lorry drivers the industry is facing. The rationale in doing so is in the short-term to avoid the wider negative economic impacts from the lorry driver shortage by giving more flexibility to deal with the current situation of a backlog in testing. In the medium to longer-term, this aims to strike the right balance between the externalities associated with road safety and getting rid of any excessive bureaucracy, with the implementation of an accreditation scheme which is aimed at developing and maintaining skills in towing a trailer in a more targeted way, while mitigating any impacts to road safety. The current legislation means the testing regime does not offer sufficient flexibility to respond to the current situation of a higher demand for drivers, which is having knock-on negative effects on other sectors of the economy and society from not moving goods. The intervention's aim is to remove any excess bureaucracy and increase flexibility so that DVSA's examiner resource can deal with the driving test backlog while also managing the potential risk of negative impacts to driver competence in towing trailers through mitigation measures such as an accreditation scheme.
19. This would help improve the flow of lorry drivers joining the industry in both the short and longer term to lessen the driver shortage and its associated negative economic impact. The incentives for drivers to build skills and experience, and/or undertake training to the benefit of road safety, can be provided through testing, or by other measures such as an accreditation scheme. Statistics are not available to show directly the effect of making such changes, and the statistical evidence available is not able to capture quantitatively the full set of potential effects. The overall effect of these changes on incentives for drivers to build skills and experience is therefore not clear cut, but is likely to be small in scale due to the relatively small share of drivers likely to be involved.
20. An industry-led accreditation scheme is being developed to provide a standardised non-statutory training approach for all motorists who wish to tow for business and leisure, not just for those who have gained a licence since 1997. This scheme, which is aimed at mitigating the potential impact on road safety, will promote the importance of getting professional car and trailer training, thereby enhancing road safety standards by delivering the specific skills that drivers who tow need. Online guidance will also provide information on learning to tow and towing safely and remind motorists of the need to carry out trailer safety checks.
21. The latest online advertised vacancies data for "Transport, Logistics, warehouse" increased by 242% from 7 February 2020 to 30 July 2021, compared to an 11% increase in total online vacancies over the same period (experimental estimates based on Adzuna online vacancies)¹⁴.
22. The government is in the sole position to be able to help increase the capacity of inflow of lorry drivers into the industry through increasing DVSA's examiners' testing capacity. The changes would increase the availability of DVSA examiner resource, and also make it more straightforward for new prospective drivers to obtain their vocational licences. The current backlog in tests that has built up through the lockdowns suggest there is pent-up demand and the actions from industry of increasing driver salaries, financial incentives to join, etc. should help increase that demand even more, although it is difficult to forecast exact figures at this point in time.
23. The proposed regulatory changes will also help to increase DVSA examiner availability and increase the number of lorry tests available (Category C licences are for rigid lorries and Category

¹⁴ <https://www.ons.gov.uk/economy/economicoutputandproductivity/output/datasets/onlinejobadvertestimates>

CE tests are for articulated lorries). The average number of tests conducted in the three years from 2017/18 to 2019/20 were, for C vehicles, some 44.5k and, for CE vehicles, some 21.2k. The removal of BE tests could lead to an increase in the supply of other vocational tests by around 37%, or 550 tests per week, compared to pre-pandemic times.

Policy objective

24. The aim of the policy is to:

- a. increase lorry driver testing capacity and therefore improve the availability of driving test appointments in order to alleviate, along with other measures being taken, the shortage of lorry drivers. While the issue of shortage of drivers is not entirely for government to resolve, government intervention can be taken on licence entitlement legislation, the changes from which have a positive impact on increasing DVSA examiner capacity in order to focus on lorry driving tests,
- b. provide certainty to car drivers on their entitlement to tow a trailer within the specified category. Change to legislation will ensure that car drivers have the flexibility to tow a trailer, if they wish to do so, without the need for a statutory test and therefore avoid any inadvertent breaking of the law from temporary measures to reduce or cease trailer testing which may be needed to deal with DVSA's driving test backlog, which in turn will help alleviate the current acute shortage, and
- c. support car drivers through communications and through other non-statutory measures, such as training, so that driving standards and underpinning knowledge when towing a trailer remain high throughout their driving career, whether their driving is involved with the leisure or commercial sectors. One option currently being progressed is an accreditation scheme to incentivise car drivers to undertake optional theory and/or practical training in towing a trailer.

Options considered

Option 0 – Do Nothing

25. Under this option, no regulations are changed and DVSA deals with the backlog in tests for vocational licences through the current testing requirements, with the only mitigations being the operational measures DVSA has implemented to help increase capacity.

26. This backlog is expected, from DVSA's modelling, to be cleared by June 2022 at the current rate of testing, without any further mitigating measures. While some re-distribution of examiners within DVSA could allow for a short-term increase in testing capacity, this alone will not clear the backlog in a suitable time period. This option would do nothing additional to help ease the current acute lorry driver shortage, particularly in the short-medium term when the impacts will be highest and is therefore not recommended.

Option 1 – Change in regulation

27. The government is proposing to take action by changing regulation to remove BE statutory tests. There are other regulation changes being implemented for similar reasons, to help DVSA tackle the driving test backlog and therefore help alleviate the lorry driver shortage.

28. GB licences will continue to be compliant with the 1968 Vienna Convention on Road Traffic for the purposes of driving abroad as visitors. We are not expecting any impact from these changes, but it may impact on mutual recognition and exchange of licences in EU countries.

2.0 Costs and Benefits

29. Although many of the benefits and costs have not been monetised, therefore not fulfilling the Impact Assessment (IA) requirement of business impacts being above £5 million equivalent annual direct costs (or benefits) to businesses, the legislation may be of wider public interest based on the potential impact to road safety. Furthermore, the measure would disproportionately impact small businesses who provide and solely focus on towing training, which drivers may choose to take before taking their BE test.

30. The Net Present Value (NPV) has not been monetised. This is due to there not being enough information to monetise certain impacts behind the policy objectives, such as the benefits of additional DVSA testing and its impact on wider society from alleviating the effects of the driver shortage on supply chains and availability of goods, but also due to uncertainties relating to the potential impact on road safety. Therefore, adding only the monetised impacts would mean the NPV not being a good reflection of the policy against its objectives, and would only capture the secondary impacts such as the savings to individuals from not having to pay for BE tests which was not part of the objective. While there is an approach, in principal, to estimate the benefits of more capacity through the GVA (Gross Value Added) method by monetising the impact of tackling DVSA's backlog of tests and its further impact on the lorry driver shortage, the Green Book's advice, however, does not allow for these benefits to be monetised as the use of GVA is only to inform policy rather than valuing impacts for the proposed options; the eventual impact on the driver shortage is also considered indirect and therefore does not fall into scope of the Equivalent Annual Net Direct Cost to Business (EANDCB); more detail on this is available in the impacts section further below. The other benefits of reduction in fees, from not having to take a BE test or training, have been monetised, and as previously mentioned these have not been added to the NPV as they are not the reason for the legislation change. This is so that the policy can be judged qualitatively against its main objectives of increasing the availability of DVSA's lorry driving tests and its further impact on alleviating the driver shortage situation.

Option 0 – Do Nothing

31. There are no costs or benefits associated with this option as this is the counterfactual and will be used to compare option 1 of regulatory change. In the scenario of 'Do Nothing', no regulatory change is made and DVSA has to deal with the backlog in tests for vocational licences through the current testing regime with no additional mitigations. The backlog in vocational driving tests would be expected to be cleared at the current rate by June 2022, or in 9 months.

32. The beginning of the two scenarios of Do Nothing and Do Something is early September, in line with the announced change in legislation in mid-September. At that point, additional implementation measures to reduce BE testing were taken after the announcement of the measure. There had been operational measures from DVSA to restrict the capacity of BE tests by 66% in August, although that falls before the appraisal period. Option 1 captures all the reductions in BE tests from the time of the announcement of removing the BE testing requirement in September, which includes the fall in demand for these tests and other reductions. Option 0 therefore reflects a counterfactual scenario where BE testing from early September remains unchanged where DVSA kept its operational measures in place, including the reduction in availability of BE tests by 66% which would have returned to normal levels once DVSA decided this was feasible.

33. Up to this current point in time, the internal operational measures that DVSA has set up to deal with the backlog in driving tests are over-time for examiners, out of hours testing, buying back annual leave, additional incentive payments and, recruiting extra vocational examiners. These count towards the baseline with which option 1 is compared, within DVSA's modelling of the backlog, to get an idea of the effectiveness of the regulatory changes.

Option 1 – Regulatory changes: removing BE tests

34. This section presents the analysis undertaken in the first option, whereby regulatory changes are made to DVSA's testing requirements, thereby removing BE tests. This would increase DVSA's capacity to carry out vocational tests relative to Option 0 and help to quicker clear the backlog of driving tests that had built up due to the lockdowns that were put in place to deal with the pandemic. This in turn will help ease the current shortage in lorry drivers the country is facing and lessen the associated negative economic impact from it, although this latter stage is considered indirect after discussions with the Regulatory Policy Committee (RPC) with more information within the impacts section. Based on internal high-level analysis and using the acute shortage figure of 39,000, it is estimated that the shortage could have an impact of £1bn per year on the GVA from road freight. This option of regulatory change may have a potential impact on road safety which can be mitigated by accredited training although this will be dependent on take up.
35. The main objective of the legislation is to help DVSA deal with the backlog in driving tests and improve the situation with the lorry driver shortage by allowing more drivers to move through the system at a quicker pace to increase the stock of qualified drivers, while also maintaining the current road safety record. Once this lorry driving test backlog is resolved, the extra capacity will be used to clear the car test backlog. The benefit of increased DVSA capacity to the haulage industry extends beyond the current acute shortage of lorry drivers, as it will also help clear the backlog in car driving tests within the medium term whereby, as things currently stand, that backlog is expected to be cleared in late 2022. The Statutory Instrument (SI) includes a 3-year period of review and any shorter period may limit the benefit. Car drivers who wish to tow a trailer or caravan also need assurance of being able to acquire legal entitlement and would be left in a state of uncertainty if we suspend rather than change legislation. Although some of the benefits of reduced fees has been monetised in the sections below, these have not been included in the overall Net Present Value (NPV), and the overall analysis will remain qualitative so as to assess the regulation against its main objectives of increasing lorry driver testing and in turn to help alleviate the wider negative economic consequences from the driver shortage situation.
36. This IA focuses on the legislation which will remove BE statutory tests which will help DVSA tackle its test backlog. The beginning of the appraisal period is from the date of the measure's announcement in mid-September due to the impact this had on demand for BE tests. Given the announcement, this essentially halved the demand for these tests in the following weeks as people deferred their booked tests knowing it was no longer going to be a requirement, and allowing DVSA to reallocate its resources to carry out more vocational tests. The impact of this measure on the backlog is assessed with the combined measures from other legislation being taken on the off-road 'manoeuvres' part of the lorry test to approved third party examiners and the removal of staging tests for the CE tests. The impact from all these measures if they were implemented at the same time would enable clearing the backlog in vocational driving tests in 3 months compared to the 9 months in the counterfactual scenario. Within the longer term, once the backlog of tests for vocational and cars is cleared, DVSA will get the number of examiners back to an equilibrium level where the waiting times for tests is back to their target – 7 weeks for car tests and 3 weeks for vocational tests.
37. It is assumed that the driver training industry is competitive, and that the fees they charge are a reflection of their time and costs to carry out the training. The removal of the staging and BE tests would free up some of their training capacity, which can be used in other aspects of training and would not impact on costs. There are some 800 training schools that operate in this industry, with most classed as small and micro businesses. Stakeholder engagement has shown that most businesses that require a BE licence will still continue with training, whereas the consultation has shown that the majority of respondents (56%) still expect drivers to keep on doing the training. The

industry-led accreditation scheme which is aimed at the provision of standardised training for all motorists wishing to tow a trailer, is expected to help mitigate impacts to training schools.

38. Removing the need for a statutory BE test may have an impact on driver competence to tow trailers, with more information in the costs section below, but we are not able to quantify this. Mitigation measures are currently being designed with industry to enhance driver competence to reduce risk, and the overall impact of the policy is likely to be small in scale. Success of the accreditation scheme is dependent on take up.
39. There will be continued enforcement and car drivers will continue to be subject to current law. This is there to ensure that they do not present harm to others. The current theory test already includes questions on towing skills, with more questions to be added on this subject within the theory test. DVSA will work with the driving instructor profession to ensure that learner drivers are prepared and understand the rationale for these changes.
40. DVSA is also working with industry to develop an accredited training scheme which would offer a non-statutory approach to training for motorists who wish to tow a heavy trailer. A more focused modular approach could offer targeted training to specific towing needs, would support and enhance driving skills, and should help to mitigate road safety risk. The potential for a more country-wide consistent approach to training, provided by existing trainers, could also mitigate the impact on training providers from any reduction in training demand from car drivers who would no longer need a statutory test. The development of the accreditation scheme is progressing with contact made with representatives within the trailer/caravan leisure and business groups, retailers and trainers. There is strong support for the scheme from across these various sectors with specific training based on DVSA's National Driving Standards.
41. This measure will free up DVSA's examiner resources, which will help to tackle the backlog in tests. Removing BE test requirements should result in an increase in 37% of DVSA's testing capacity relative to normal pre-COVID times, equivalent to around an extra 550 weekly tests.
42. As mentioned above, there will likely be additional capacity for the businesses providing the training through the removal of this test, which could be used to train prospective lorry drivers and further improve the throughput of drivers into the road freight industry.

Summary

Unmonetised Costs

- **Familiarisation costs for prospective new drivers (direct)**
- **Potential negative impact on driver competence of those towing trailers from the removal of BE testing (direct) – Wider society**
- **Potential additional externality costs from increased trailer use (indirect) – Wider society**

Monetised Benefits

- **Savings to individuals not needing to do BE tests, including the training costs (direct) – primarily on individuals.**

Unmonetised Benefits

- **Increased testing capacity for DVSA to help clear the backlog in driving tests (direct) – Wider society**
- **Reduced disruption from the lorry driver shortages due to the increased testing (indirect) – Wider society**

Costs

Transition costs

43. **Familiarisation costs (direct) – potential new drivers (mostly individuals):** Prospective drivers will have to familiarise themselves with the regulation changes and the new approach to testing, whereby there is no longer any requirement to pass a BE test to tow a trailer, but there will be an accreditation scheme. These costs are expected to be very low and are therefore non-monetised. Most prospective drivers are familiar with the existing regime and a series of public announcements have been made to raise awareness on these changes, further limiting any familiarisation costs to the public.
44. **Familiarisation costs (direct) – trainers (businesses):** Trainers will have to familiarise themselves with the new regulation changes that remove the requirement of BE tests. DVSA estimates there are around 800 training schools that operate within the industry. Some of these training companies might focus specifically on BE training and therefore could be disproportionately impacted by the regulation change; however, following Green Book guidance we expect this to be a competitive industry, and therefore, training schools can use the time previously spent on BE training on something else productive.
45. The consultation has brought up that respondents are expecting drivers will still want to take BE training. Responding to the consultation question ‘Do you think drivers would continue to want to take some training, even if a test is not required?’, 54% of respondents expect drivers to continue wanting to take some training for BE, relative to those responding ‘no’ (32%) or don’t know (12%); this goes up to 64.4% responding ‘yes’ when looking at individual members of the public. Anecdotal evidence from stakeholder engagement has shown that most businesses that do use BE licences will still carry on with BE training. An accreditation scheme is currently being developed with the industry and therefore, firms that focus specifically on BE training should only be minimally impacted by this change in legislation as there should still be demand for training.

Ongoing costs

46. **Impact on road safety from the removal of BE testing (direct) – Society:** The issue of driver competence to tow heavy trailers is being addressed by the industry-led accreditation scheme aimed at providing voluntary bespoke training in this area which is intended to mitigate the risk. There is some uncertainty regarding the take up this initiative, however, we are working with the industry to promote the benefits of the scheme.
47. There is, in addition, insufficient information to be able to get an idea of the exact impact expected from removing BE tests. The section below explains what the BE tests are and what they consist of, outlining the road safety statistics¹⁵ and what these statistics suggest the impact of the introduction of BE tests may have had on road safety, and finally, what engagement with the industry has revealed regarding the expected reaction from businesses and the mitigation measures that DVSA is working on.
48. BE tests were introduced in 1997 as a result of European legislation – Council Directive 91/439/EEC of 29 July 1991¹⁶ - in order to improve safety in driving vehicle and trailer combinations. The pass rate is currently around 70% for this type of test, which has steadily been increasing over the last 14 years from 58% in 2007-8 (which is as far back as this data goes).

¹⁵ Note: 2019 data rather than 2020 is used, as lower traffic flows resulted in fewer than typical accidents although higher accident rates per vehicle kilometres in 2020.

¹⁶ [EUR-Lex - 31991L0439 - EN - EUR-Lex \(europa.eu\)](#)

49. It is possible, under a BE driving entitlement, to drive vehicle and trailer combinations of approx. 15 meters in length (limited by size availability and regulations). Currently there is a diminishing pool of drivers who can drive such combinations, having acquired the BE entitlement through implied rights by virtue of having taken their test before 1997. However, this will be a diminishing number since the regulations changed in 1997. Removing the need to take a BE test will mean an increasing pool of drivers who can drive lengthy and heavier combinations without previously testing their competency.
50. The availability of other data was investigated for this IA, such as the volume of vehicle and trailer traffic, and the amount of trailers/caravans in circulation, and the possibility of accessing data through trailer sales or trailer leasing companies has been explored. However, this did not yield anything suitable for this analysis.
51. The accredited training scheme will be promoted to encourage any driver, including those who already hold grandfather rights to tow a trailer, to take up training. Many drivers who tow a heavy trailer for work may need to take training requested by their employer and private drivers may continue to choose to take training.
52. We also know from the consultation that there is an overwhelming response from road safety groups against the removal of BE, with 81.4% of these groups disagreeing with the proposal. One of the few respondents from this group that agreed with the proposal of removing BE testing mentioned the training should be made mandatory instead. Their main safety concerns were the risks associated with reversing and uncoupling/recoupling trailers, with a few responses noting that these are the areas most people fail their BE tests in, and that there would be a general decline in road safety due to many people not being aware of the risks associated with improper use. This risk will be mitigated through the accredited training scheme being developed with industry; success will be dependent on take up of the scheme.

STATS 19 data

53. Based on STATS19 data¹⁷, figures show that in 2019 there were 865 reported personal injury accidents involving any vehicle towing a single or double trailer or caravan. When police officers attend the scene of a collision, they can select up to six contributory factors (CFs) that they believe contributed to the collision for each vehicle or casualty involved. Officers do not need to carry out a full investigation of the incident before allocating CFs - they usually use professional judgement about what they can see at the scene. Of the 865 reports of any vehicle and trailer accidents in 2019, 623 had at least one CF assigned. The CFs assigned suggest that 315 of these accidents involved driver error (36% of total accidents) with a further breakdown as follows:
- Any of the factors considered driver/rider error or reaction: 252 accidents (6 fatal, 69 serious, 177 slight)
 - Poor turn or manoeuvre: 42 accidents (1 fatal, 9 serious, 32 slight)
 - Speed (exceeding speed limit or travelling too fast for conditions): 21 accidents (1 fatal, 4 serious, 16 slight)
 - Additionally, in 378 accidents at least one CF was assigned to the towing vehicle
 - In 42 accidents the towing vehicle had a vehicle defect assigned (mostly 'overloaded or poorly loaded vehicle or trailer' – 28 cases)
 - In 17 accidents, the towing vehicle had one of the four defects which could have been noticed with mandatory testing, as follows:
 - Tyres illegal, defective or under-inflated - 9 accidents
 - Defective lights or indicators - 5
 - Defective brakes - 3

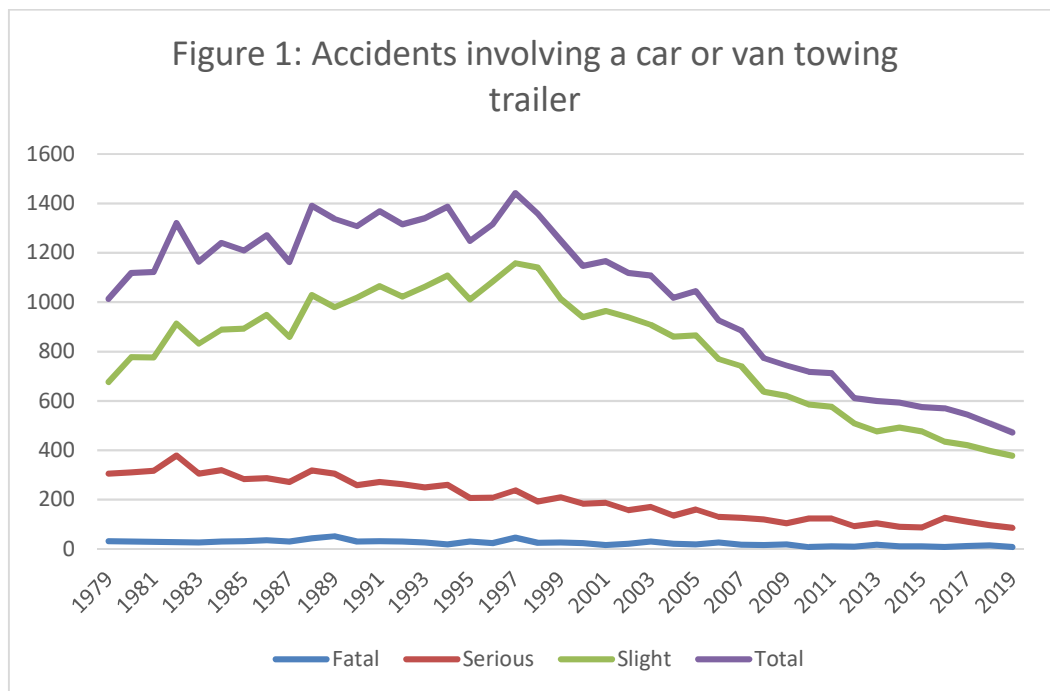
¹⁷ <https://data.gov.uk/dataset/cb7ae6f0-4be6-4935-9277-47e5ce24a11f/road-safety-data>

- Defective steering or suspension - 1

54. Also based on 2019 STATS 19 data, there were 474 reported accidents which involved a car or van towing a trailer, 8 (1.7%) of these were fatal, 87 (18.4%) serious and 379 (80%) slight. This is compared to equivalent data for reported accidents involving at least one car or van, where in 2019 there were 108,348 accidents in total, 1,364 fatal (1.3%), 19,947 (18.4%) serious and 87,037 (80.3%) slight. This comparison shows that the proportion of fatalities are slightly higher when a trailer is towed.

55. When comparing the proportion of accidents involving a car/van towing a trailer to all car/van accidents, it represents a small proportion, roughly 0.45% in 2019 (compared to 0.65% in 1997). This proportion is low; however, we do not have data on distances travelled by cars or vans with trailers, which we do for cars and vans. Therefore we do not know how the accident rate per mile travelled compares for cars/vans towing a trailer to those not towing a trailer.

56. As can be seen in Figure 1, there was a decline in the number of personal injury accidents reported to the police involving at least one car/van towing a trailer after 1997, when the BE test was introduced.

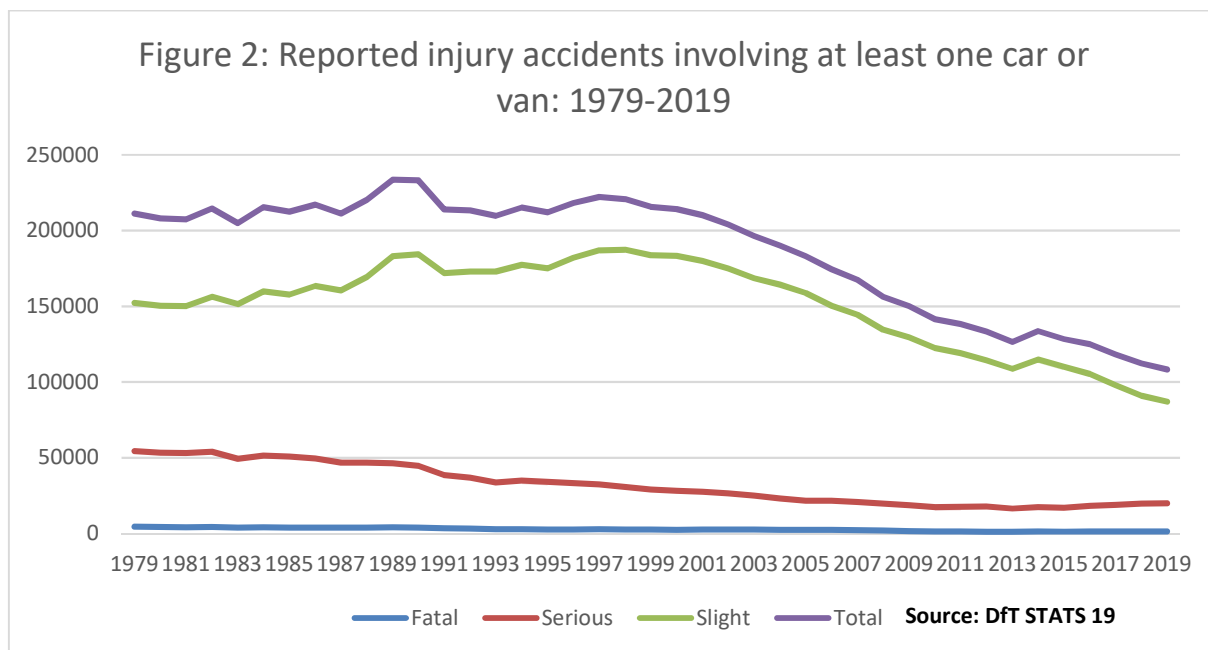


57. However, the decline in the number of accidents may also be accounted for by other safety improvements over this period which influences this trend, such as:

- vehicle safety improvements or schemes to encourage them (e.g. introduction of electronic stability control and the establishment of Euro N-CAP);
- improvements to road infrastructure (both improvements to existing roads and the building of new roads including new motorways);
- changes to licencing requirements and training (e.g. introduction of the written theory test) and its later update to include a hazard perception element; and
- changes to licencing requirements though the New Drivers Act – which means if a driver receives six or more penalty points in their first two years of driving, they lose their licence and must retake both their theory and practical test before being allowed back on the roads.

58. Figure 2 shows that the numbers of personal injury accidents involving at least one car also declined from 1997. However, there was a greater fall in the number of car and trailer accidents

between 1997 and 2019 than there was in all car accidents. Given the many other factors which improved road safety, we do not know to what extent the car and trailer test would have contributed (and also note we cannot identify what proportion of the post 1997 accidents will have involved a car and trailer driven by a driver who passed their test before 1997, and thus did not have to do the BE test).



STATS 19 data – analysis by age

59. Figure 3 presents the numbers of reported accidents between 1979-2019 where it involved a car towing a trailer and by age of the driver. Pre-1997, accident rates across all age groups were largely clustered together and steadily increasing, but after 1997, all age groups start to decline.

60. As noted previously, there were other safety improvements over this period which will have influenced the trend. From the graph we see a slight deviation in the age groups, those aged 55+ (with grandfather rights) experienced slower declines in reported accidents compared to other age groups.

61. Currently, all of those entitled to the grandfather rights for BE entitlement would be aged 41 and over (the youngest of these would have passed the test aged 17 in 1997). Therefore, there appears to be a faster decline in accident rates for younger age groups (in line with the index of the total accident rate). It also shows that the youngest individuals who had comparably higher accident rates before 1997, became those with the lowest accident rates by 2019.

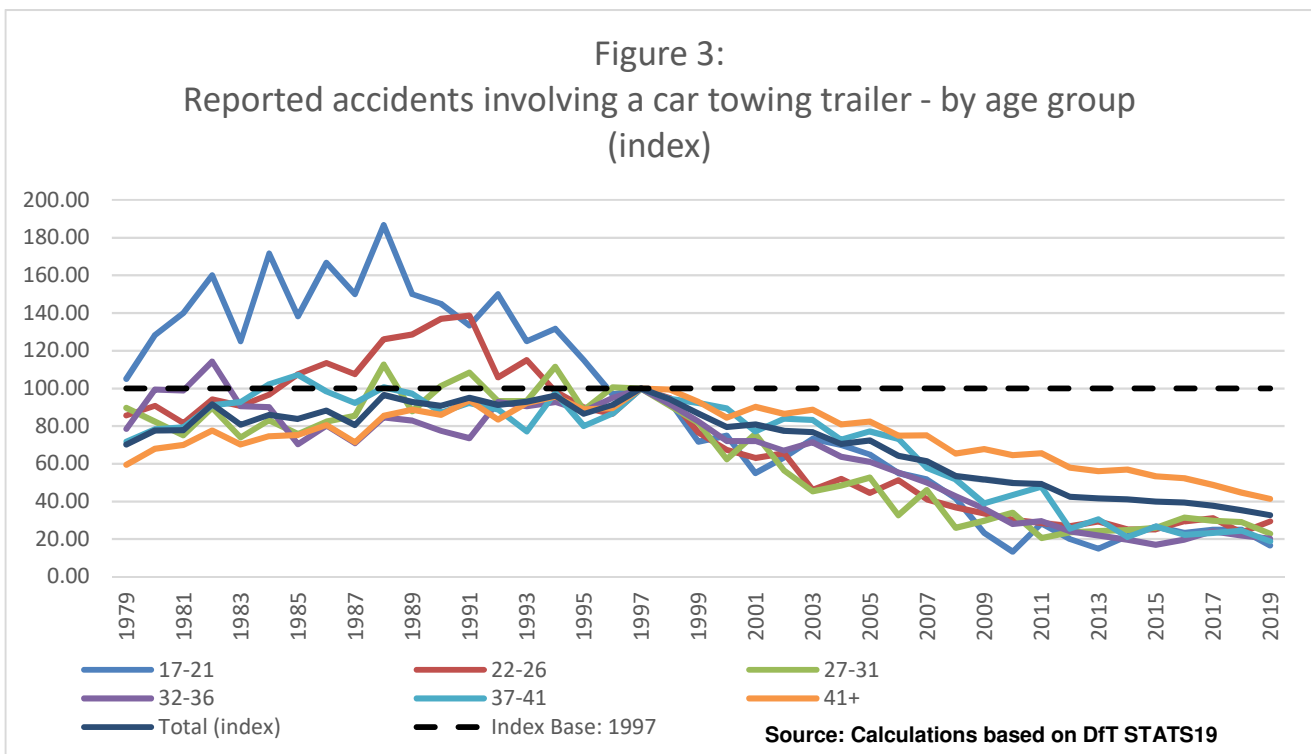
62. The other areas which impact on older drivers in increasing accident rates are:

- The ageing population¹⁸ and changes in travel patterns (before the start of the pandemic older people were travelling more than in previous years with younger people travelling less¹⁹) have led to an increase in the number of older road user deaths and serious injuries in recent years

¹⁸ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections>

¹⁹ National Travel survey data (<https://www.gov.uk/government/collections/national-travel-survey-statistics>)

- Older people are more vulnerable to road traffic injury – if they are in a collision, they are more likely to be injured than younger people²⁰
- Those in older age groups are increasingly likely to be retired (or have more leisure time available) which is likely to be correlated with higher trailer usage such as caravans (which is unobserved).
- A similar effect may be noticeable in the 35-54 age group (with the minimum age being 41), so the impact is likely to be less noticeable for those aged between 41-54.
- Other interventions aimed at young drivers introduced in the late 1990s affecting their accident rate in addition to the benefits of BE testing
 - o As flagged previously, other key changes to the testing and licencing of new car drivers were made in the 1990s and early 20s, which are likely to have had an impact on the accident rate for the youngest age groups.
 - The written theory test was introduced in July 1996 and was updated in 2002 to include the hazard perception element
 - From June 1997, the New Drivers Act came into force (if a new driver gains 6 or more penalty points during the first 2 years of driving, they lose their licence and must retake both the theory and practical driving test before being allowed back on the roads)



Further data

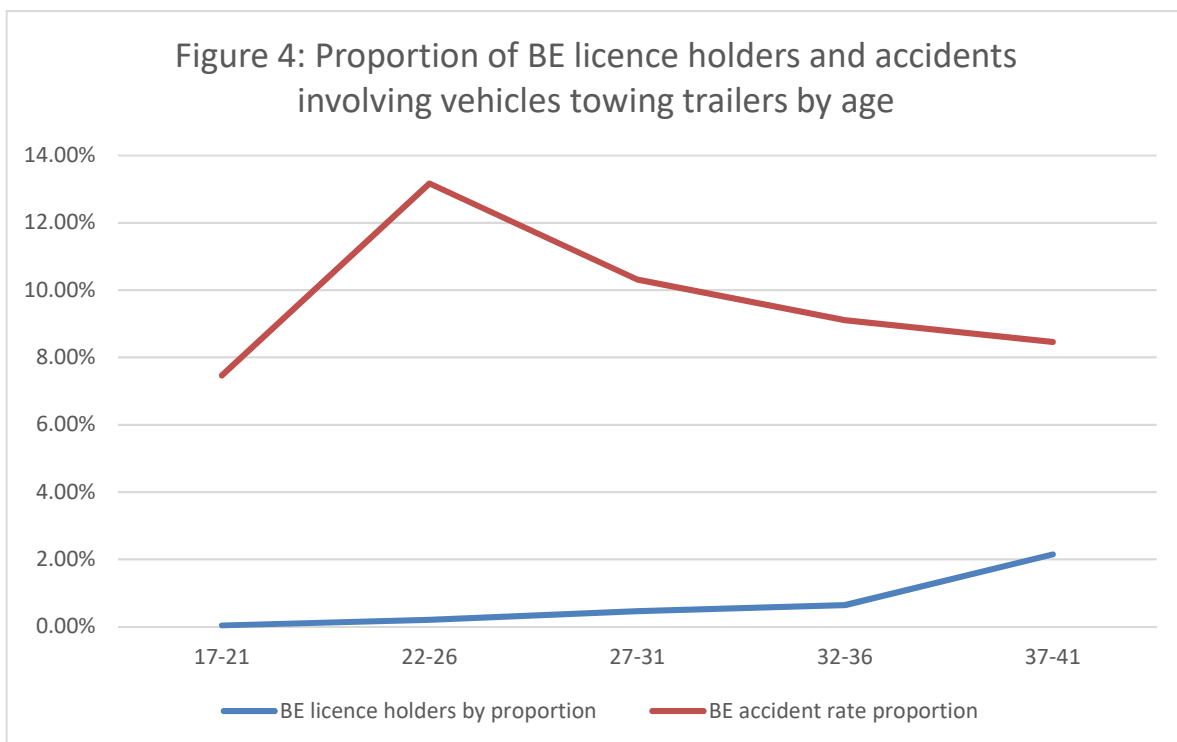
63. Data on the Serious and Dangerous faults which resulted in candidates failing their BE test between 2016/17 and 2019/20 reveals the most common fault by type of manoeuvre to be ‘reversing and reverse parking’ at 17% and ‘uncoupling/re-coupling’ at 13%, which are key skills tested within the BE tests. A summary table of the top 10 faults (described by DVSA as “serious and dangerous” under their test procedures) between 2016/17 and 2019/20 can be found in Annex A, in both the individual format and by type of manoeuvre. Of the former, the most common individual Serious and Dangerous faults leading to failure of BE tests are ‘Reverse left – Control’ and ‘Uncouple/recouple’. These two reasons, which are key skills tested for in the BE test, account for 31% of all Serious or

²⁰ Reported road casualty data (stats 19) indicates that the proportion of casualties which are fatal or serious increases with age. We do not hold data on damage only collisions, but it is likely that the proportion of collisions involving any injury also increases with age.

Dangerous faults (leading to immediate failure of the test) between 2016/17 – 2019/20. While the testing process allows us to assess the drivers’ skills at the point of test, it does not indicate that the practices may be followed in the post-test environment and therefore translate into large changes to road safety. Further analysis to compare the evidence between the faults for failing the BE test and Contributory Factors data within STATS19 (CFs, paragraph 49 above) was not possible as the datasets do not match exactly and have different breakdowns.

64. Statistics on licence holders by age show that individuals generally only start getting their BE licences from their late 30s and 40s onwards, therefore indicating that people tend to start towing within the later age groups. We do not know if this trend will change after the regulation is implemented.

65. Analysis of the proportion of licence holders relative to accidents involving a vehicle towing a trailer by age reveals accidents are distributionally higher within lower age groups, which mirrors the accident statistics for vehicles more generally. The graph below shows the proportion of BE licence holders by age, and the proportion of accidents involving cars and vans towing trailers by age, with the age categories above 41 having been removed due to their grandfather rights. There could be an increase in accident rates and/or a change in the age distribution of drivers towing trailers.



66. Although the measure removes the requirement of doing BE tests and therefore also of its training, the consultation responses suggested that most respondents still expected other new drivers to keep doing training for BE. A question on this measure asking “Do you think drivers would continue to want to take some training, even if a test is not required” received mostly positive answers (56%), rather than negative (32%) or not knowing (13%). Furthermore, DVSA’s stakeholder engagement has shown there is a strong indication from the professional business users that they will continue to undergo BE training to ensure staff are safe and competent and that their corporate responsibilities are fulfilled. One of the mitigation measures is an accreditation scheme, which will be looking to incentivise drivers to take towing training. DVSA is engaging with stakeholders to identify a share of how much of BE training will continue but this was not possible to estimate. There will also be additional questions relating to towing a trailer, and recoupling/uncoupling a trailer, that will be added within the driving theory test by DVSA.

67. Potential additional externality costs from increased trailer use – wider society (indirect):

There is no knowing exactly what the behavioural change will be from this legislation change. The removal of the legislation would remove one of the barriers in being able to tow a trailer and therefore demand and use of trailers could subsequently increase. If that happens, there would likely be additional costs in terms of externalities from having more vehicles towing trailers on the road. The additional trailers could have an impact on congestion on roads, fuel use could increase due to the weight and drag of these trailers, and there could be additional emissions relative to cars. The safety externality has already been mentioned in the section above.

Benefits

Unmonetised Benefits

68. Reduced administrative burden for businesses that do require a BE licence (direct) –

prospective drivers: The removal of the requirement to pass a BE test, and its relevant training, will remove some administrative burden to individuals and also businesses that require a BE licence.

69. From the consultation responses, businesses and industries that do use BE licences tend to be within the agricultural industry, equestrian industry, or work as builders, gardeners, delivery firms and caravan companies. The removal of BE would lead to an increase in the pool of labour that these businesses can recruit from as there will be no more BE test requirements. It could also remove certain costs as employees would not need to pass any tests or training and would give businesses more freedom and flexibility to train their employees to their desired standards. Some response to the consultation thought that insurance premiums would rise as more ‘unqualified’ drivers enter the industry and that the labour market would be flooded with inexperienced drivers. We do not know that this will be the case. Increased trailer traffic on roads could likely increase congestion and push up costs for businesses, and the increase in underqualified drivers could further increase disruptions and reduce efficiency due to issues with manoeuvring.

70. Increased testing capacity for DVSA to help clear the backlog in driving tests (direct):

DVSA’s modelling estimates that the removal of BE tests is expected to release around 37% of DVSA’s examiners’ capacity relative to normal times. This will enable DVSA to use this freed-up capacity to focus on vocational tests to quicker clear the backlog in driving tests and help ease the current issue of lorry driver shortages. Once the backlog of vocational tests is cleared, DVSA will then be able to focus its extra capacity in clearing the car tests backlog as well.

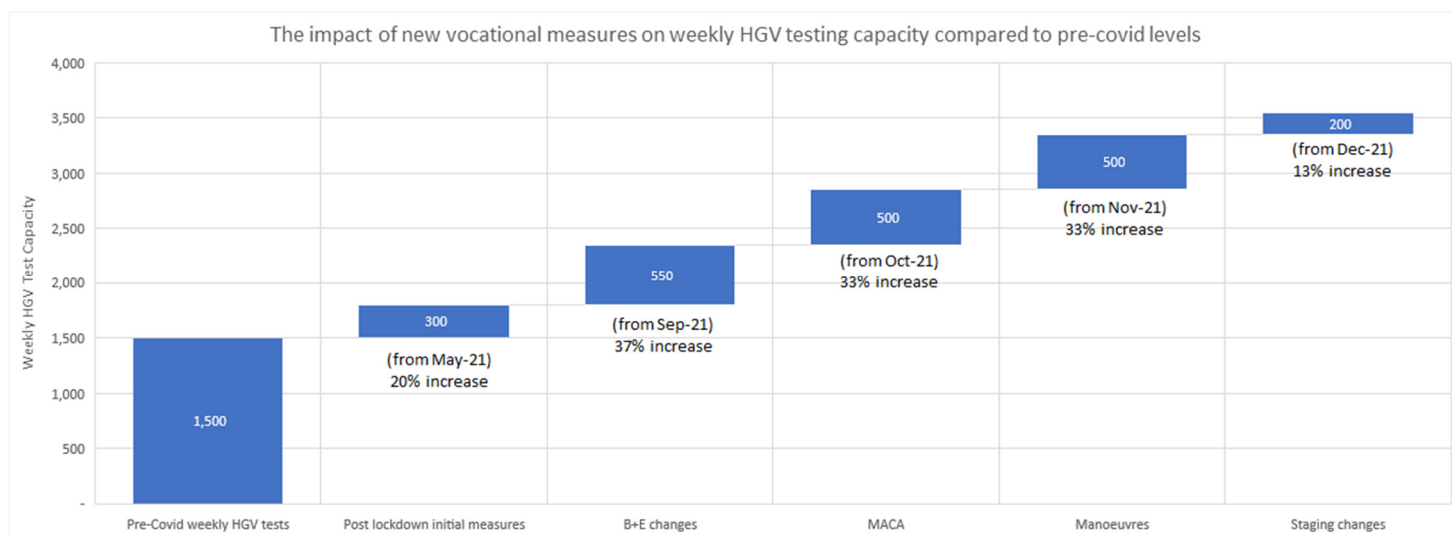
71. There are also two other pieces of legislation which add further measures to help DVSA tackle the backlog, which are covered in other DMAs. These other measures are delegating the ‘manoeuvres tests’ to approved third-party assessors and the removal of ‘staging’ for CE tests. All of the estimates on the backlog and the timings of it being cleared, with or without measures, are derived from DVSA’s modelling. The model forecasts the supply of tests from DVSA, which considers the availability and usage of its examiners and the demand for tests, which uses a mixture of published and internal historical data. This set of measures would ease the pressures caused by driver shortages by allowing a larger inflow of new drivers with ‘vocational’ licences (which are the licences needed to drive lorries) into the industry²¹.

72. There is also an analytical assurance statement on this model within Annex B. The impacts of the BE measure on the expected time to clear the backlog will be firstly compared by itself relative to the

²¹ Although the model is based on the best evidence-available, such as a mixture of published and internal historical data, there remains underlying uncertainty in these forecasts as these trends might not be as applicable to the current climate with the pandemic. Any further unforeseen events, for example from further pandemic lockdowns or restrictions, could impact on demand forecasts and predicted timelines for clearing the driver testing backlog. Furthermore the driver shortage situation is changing at a fast pace and additional measures implemented to tackle the lorry testing backlog will impact on the modelling’s precision and also likely lower the impact of these regulatory measures towards tackling the backlog.

do nothing scenario, whereby DVSA can only rely on their operational measures and not the regulatory ones. Secondly, the overall impact of all three DVSA measures to tackle the backlog will be reflected together relative to this Do Nothing scenario. The introduction dates for the removal of BE tests measure, delegating the manoeuvre test and removal of staging, are from mid- September 2021, November 2021, and December 2021 respectively. The manoeuvres measure is the most complicated operationally and will likely be gradually introduced and take some time before being fully taken up by the private sector – this uncertainty has been captured within the sensitivity analysis.

73. Within the ‘Do Nothing’ scenario, the backlog in lorry driver tests would only be cleared by June 2022 and includes all the operational measures being used by DVSA to increase their capacity. These operational measures from DVSA include buying back annual leave, additional incentive payments, recruiting extra vocational examiners, increased overtime and higher utilisation rates of tests (from higher demand) until March, additional incentive payments, reducing availability of BE tests by 66%, and finally, recruiting extra vocational examiners. The measure of removing BE tests would free up 37% of DVSA’s examiner capacity relative to normal times and would by itself enable an extra 550 weekly tests, as the table below indicates. However, DVSA has already been slowly reducing the availability of BE tests due to the legislation coming in, and BE tests were down by 66% in September 2021. The announcement in September 2021 about the upcoming regulation changes has meant that demand for BE has since dramatically fallen and DVSA has therefore nearly completely removed the availability of these tests from October onwards. As the table below shows, the effect of removing BE tests will increase DVSA’s weekly lorry testing capacity by about 550 tests from September onwards, a 37% increase relative to pre-COVID weekly capacity.



74. Sensitivity analysis has been carried out on this impact. The central scenario would allow for clearance of the backlog in vocational tests within 3 months, by December 2021. A high benefit scenario happens where all three measures are implemented at their earliest possible dates (which are the ones within the table above, and similar in that regard to the central scenario) and combined with slightly lower demand for tests; this results in the tests backlog being cleared within 2 months, by November 2021. The low benefit scenario represents a situation where some of the measures are implemented at a later date (BE in October 2021, and manoeuvres in February 2022) and there is higher demand for tests. The manoeuvres sensitivity is set to February 2022 rather than November 2021 in the central, due to this measure being the most complicated operationally and given that the private sector could take a while before being able to fully pick up these tests. The low scenario results in the backlog being cleared in 6 months, in March 2022.

75. **Reduced disruption from the lorry driver shortages due to increased testing (indirect) – Wider society:** The previous impact of increased testing capacity for DVSA will have a further

(indirect) impact on the lorry driver shortage that the country is currently facing. The removal of BE is considered indirect, as there are several steps in the logic chain and is dependent upon DVSA reallocating resources from BE testing to lorry testing.

76. The logic chain is as follows. The policy intervention would mean DVSA removes the BE testing requirement, which will then lead to additional testing capacity in lorry tests. This additional testing capacity will allow more prospective lorry drivers to get their licence should they choose to do so, and should therefore increase the pool of lorry drivers in the UK and further increase the number of lorry driver hours available for businesses to use. This will have wider benefits to the economy through reduced disruption due to lorry driver shortages.

Ongoing benefits

77. Savings to individuals not needing to do BE tests, including the training costs (direct):

Individuals needing to get a BE licence will no longer need go through the training and the test, and therefore would be spared the cost of the fees for the training and test.

78. There would be cost savings to individuals who no longer would be required to take a BE test or any associated training beforehand, which represents a direct cost saving to the individual who would otherwise have taken the training and test. In 2021 prices, the cost of a BE course is understood to be around £500²². The cost of the BE test is £115. The cost savings are based on the number of tests conducted in the financial years 2017/18-2019-20 prior to the pandemic.

79. Sensitivities of +/- 20% are used on the number of BE tests carried out, the costs of BE courses and the number of candidates taking BE courses. An additional sensitivity is carried out on the percentage of drivers that will still take BE training in the future – the consultation responses brought up that people expected around half of drivers (54%) to continue taking BE training, which is used within the central scenario. The high benefits scenario reflects a situation where a higher range of fee reductions for consumers is achieved through a low percentage of people who decide to continue taking BE training after the regulation change (25%), and the low benefit has a higher uptake of training than the consultation suggested, following the possible effect of an accreditation scheme to incentivise drivers to take a course, assumed at 75%. There is no way to know exactly what the behavioural change will be from the regulation change and the high and low scenario are therefore based on assumptions. The benefits are estimated as follows:

2021 prices, 2021 present values	Central	Low	High
Cost BE test	£115	£115	£115
Number of BE tests (avg 2017-20) – sensitivity	29,439	23,551	35,327
Fees no longer paid for BE tests (annual, 2021 prices)	£3,385,485	£2,708,365	£4,062,605
Cost of BE course	£500	£400	£600
Number of candidates taking BE course – sensitivity	23,797	19,038	22,846
Percentage of candidates that will still take the training - sensitivity	50%	75%	25%
Fees no longer paid for BE courses or training (annual, 2021 prices)	£5,949,250	£1,903,800	£10,280,700
Total Annual Benefit (primarily to individuals)	£9,334,735	£4,612,165	£14,343,305

80. Training will continue to be available and it would be up to individuals to decide whether they would want to undertake it or not. DVSA's stakeholder engagement has shown there is a strong indication from the professional business users that they will continue to undergo BE training to ensure staff are safe and competent and that their corporate responsibilities are fulfilled. The anecdotal evidence strongly points towards businesses still keeping up the training, and therefore, the main benefits from

²² ibid

the removal of training fees falls nearly entirely on leisure users of BE. Since this is the main monetised impact, it also means the IA definitely is within the threshold of the £5 million expected annual net direct cost to businesses (EANDCB).

81. Discussions are underway for having an accreditation scheme that would further incentivise drivers to undertake BE training and with the aim to help maintain road safety standards. The consultation was also used to enquire whether people thought “drivers would continue to want to take some training, even if a test is not required?”, with a majority answering ‘yes’ (3416 responses, 54%), and a minority answering ‘no’ (2010 responses, 32%), with the rest either answering ‘don’t know’ or not giving a full answer. This ‘yes’ percentage goes up to 64.6% when taking into account only respondents who identified as being ‘members of the public’.

82. The average pass/fail statistics for each type of test between the financial years of 2015/16 to 2019/20 was as follows:

Average 2015-20 FY	BE
Tests conducted	27,282
Passes	19,052
% passes	69.83%
Fails	8,230
% fails	30.17%

Break-even analysis

83. Due to the uncertainty surrounding the road safety impact, a break-even analysis has been carried out to show how much accidents will have to rise to counter any benefits of the regulation. The benefits of the policy are from the reduced fees to (mostly) individuals from not having to do BE testing and training – these come down to around £9.3m annual benefits in total within the central scenario, and a maximum of £14.3m within the high scenario, which are from the monetised benefits section above. The break-even analysis also uses a 10-year appraisal period which is undiscounted.

84. For this analysis, we assume the ratio between slight, severe and fatal accidents to remain similar to the 5-year average of accidents involving car and vans with trailers between 2015 and 2019 – which is shown in the table below. The TAG values²³ for prevented accidents, split by severity, are used to monetise these impacts and to get an estimate of the number of accidents needed to negate the benefits of this regulatory change.

Table A 4.1.3: Average value of prevention of road accidents by severity (2021 prices & 2021 values) from TAG update (30th of July 2021)

Accident severity	TAG values
Fatal	£2,392,340
Serious	£274,487
Slight	£27,926

Stats19 data	Fatal	Serious	Slight	Total
2015-2019 average	11	101	422	534

²³ <https://www.gov.uk/government/publications/tag-data-book>, table A 4.1.3

85. Within the break-even analysis, where the current £9.3m annual monetised benefits are included, the overall accident rate would have to rise by an average of 14.18% per year to negate all of the benefits. Using the high scenario figure of £14.3m, the rise in accident rates would have average 21.79% per year to negate all the monetised benefits. For comparison, accident rates for vehicles (cars and vans) with trailers were 381% higher in 1997 than they are today, although as the safety impact section has already explained, that is due to a contribution of factors and not only BE testing.

Business Impact Target Calculations - BIT assessment undertaken – figures in Analysis and Evidence.

86. The Business Impact Target Score (BIT Score) from the regulation change is estimated to be below the £5 million threshold of the EANDCB. The direct benefits of this legislation change would fall onto the ones paying for category BE a) training fees and b) testing fees.

87. As mentioned previously in the IA, every attempt has been made to estimate the percentage split between business and leisure for the use of BE. Information about who pays the fees for testing and training remains confidential, however, evidence gathered through stakeholder engagement and consultation suggest these changes primarily benefit individuals rather than businesses.

88. For impact a), stakeholder engagement and consultation suggests that businesses that do use the BE licence will keep on training their individuals even after the regulation is changed to ensure staff are safe and competent and that their corporate responsibilities are fulfilled, and therefore the benefits from a) would fall primarily onto individuals compared to the counterfactual.

89. In practice, businesses in haulage are primarily SMEs (99.7%)²⁴ and based on engagement with stakeholders they do not tend to pay for the training and testing of their employees as the driver qualifications are sent to the drivers' address and carries with them should they move, and the qualification is a transferrable skill within a homogenous workforce. The legal mechanism relating to pay-back clauses is also unclear and therefore most businesses prefer to not take the risk²⁵. Therefore, we expect the landscape to be similar for BE qualifications, although business use of BE is sufficiently low that we have not had significant engagement from businesses using BE vehicles.

90. Some businesses using BE vehicles may continue to offer additional training for their drivers as they currently do. Businesses have not indicated any desire to change their voluntary training levels at consultation or through stakeholder engagement, however, if businesses did choose to change their level of voluntary training due to the regulatory change, DfT would classify any costs or benefits incurred here as indirect as they are not "automatic and unavoidable". This means any costs or benefits accrued here would not count towards the £5m equivalised annual net direct cost to business de minimis threshold.

91. In addition to the above, in reality, we expect there to be very few business users of BE vehicles. The industry is sufficiently small that we have not been able to determine the size or shape of the industry through extensive stakeholder engagement and consultation, and as such, do not believe it proportionate to attempt any further estimation.

92. With regards to b), which is the only impact that would benefit businesses, the benefit is of £3.4m (central), with a maximum of £4m (high scenario), annually and is again expected to fall primarily on to individuals. Even if all of those benefits from the removal of fees went to businesses, this DMA would not pass the EANDCB threshold of £5m. The knock-on benefits behind the policy objectives of

²⁴ Business Population estimates 2020: <https://www.gov.uk/government/statistics/business-population-estimates-2020>

²⁵ This is based on the generalised views expressed through stakeholder engagement.

increasing DVSA's testing capacity to help clear the testing backlog and alleviate the lorry driver shortage is considered indirect and therefore does not have any impact on the BIT.

93. For clarity, we have conducted another break-even analysis to show that even when making unrealistically high assumptions of business-incurred costs and benefits, we still fall below the de minimis threshold. This assumption includes the benefits from the reduction in training fees (b) even though anecdotal evidence strongly suggests businesses would not benefit from it, and the benefits from impact on a) training fees. The break-even reveals that the business/leisure split of BE licences' use would have to be at 53.56%, or above, in favour of business use for the central estimate's business impacts to be above the EANDCB threshold. The same analysis using the high scenario estimates show that business use of BE licences would have to be 34.85% or higher. This is very unlikely as in reality we believe the actual business use to be very low. The EANDCB is therefore below the £5 million annual threshold.

94. As the measure has an EANDCB of less than £5m, it is considered a 'Non-Qualifying Regulatory Provision' under the 'de-minimis' exemption for Business Impact Target accounting purposes. The nature of the measure of removing BE test requirements is expected to be controversial due to its potential impact on road safety, and therefore warrants additional consideration and analysis, more in line with a full Impact Assessment.

Sensitivity Analysis

95. The analysis bases itself on the best evidence available; however, due to how quickly the situation is changing, many areas of uncertainty remain. Sensitivities have been carried out on these areas, as well as on other estimates, to ensure the analysis captures the ranges of the possible impact of the regulation. These are all listed within the table below. The High scenario represents the higher costs and higher benefits range whereas the Low scenario represents a situation whereby the costs and benefits impacts are within the lower range. The sensitivities surrounding DVSA's modelling change the implementation dates of the measures, especially the Manoeuvres outsourcing due to it being the most complicated operationally. It also has sensitivities surrounding the demand for tests.

96. The table below sets out the assumptions used for the sensitivity testing, whereas the actual sensitivity testing is provided within the cost & benefit section and their impacts.

Sensitivities	Central (Best Estimate)	Low cost/benefit	High cost/benefit
BE course cost	£500	Central minus 20%	Central plus 20%
Number of BE tests carried out in Do Minimum scenario	29,439	Central minus 20%	Central plus 20%
Base number of people taking BE course in Do Minimum scenario	23,797	Central minus 20%	Central plus 20%
Percentage of candidates still taking training within Do Something scenario	50% (similar to consultation respondents' expectations)	75%	25%
DVSA's driver testing backlog clearance model	BE Sep-21, Manoeuvres Nov-21, Staging Dec-21, standard demand	BE Oct-21, Manoeuvres Feb-21, Staging Dec-21, with higher demand assumption	BE Sep-21, Manoeuvres Nov-21, Staging Nov-21, lower demand assumption

3.0 Risks and unintended consequences

97. There is a risk due to how fast moving the lorry driver shortage situation is. This Impact Assessment uses the latest evidence on the lorry driver shortage to advise, however, the situation is constantly changing at pace. The latest evidence and latest updates from official statistics such as ONS have a time-lag of several months or half a year, meaning the best evidence is usually always catching up to any of the news or latest updates arising from the driver shortage situation. As the lorry driver situation has been evolving, there have been additional measures put in place, the latest being the use of the Ministry of Defence's examiners to help DVSA tackle the driving test backlog. Any such further measures would have an impact on both the 'Do Minimum' and 'Do Something' scenarios and the size of the backlog, which would therefore have further effects on the assessment of the impacts of this BE measure. Any additional measures to increase DVSA testing capacity or attract more drivers to the industry will lessen the effect, and possibly the need, of these regulatory measures.
98. As previously stated, there may be implications for driver competence in towing trailers, although there is insufficient data to definitively state this. To address this, and to encourage drivers to build on their driving skills and expertise, an industry-led accreditation scheme is being developed. This provides a standardised non-statutory training approach for all motorists who wish to tow for business and leisure, not just for those who have gained a licence since 1997. This scheme, which is aimed at mitigating the potential impact on road safety, will promote the importance of getting professional car and trailer training, thereby enhancing road safety standards by delivering the specific skills that drivers who tow need. Online guidance will also provide information on learning to tow and towing safely and remind motorists of the need to carry out trailer safety checks.
99. There is uncertainty as to the potential impact on road safety. There is a risk that some drivers may not choose to undertake the training, although also the potential that some pre-1997 drivers do. Success of the accreditation scheme will be dependent on take up.
100. To help mitigate any potential risk, there will also be additional questions in the driver theory test relating to towing a trailer and uncoupling/recoupling a trailer. The effect of this regulatory change will be closely monitored through a post implementation review (PIR) which will assess the impacts 3 and 5 years after regulatory change.
101. The effectiveness of this regulation change to help tackle the driver testing backlog and further help with the current lorry driver shortage depends on the underlying demand from those within society who have the ambition to become professional drivers of these vehicles.
102. If the potential demand of becoming a lorry driver is small, no steps that the government can take in making the process easier will encourage a greater number to seek to become drivers of these vehicles, which is why it is important that the government and haulage industry work together to solve the driver shortage issue. Waiting times for lorry tests were around 9 weeks at the end of the last lockdown and 8 weeks at the beginning of September, above the target of 3 weeks set by DVSA, which indicates a backlog of tests as we exited lockdown restrictions. The government has no way of knowing how many would seek a career in the haulage sector in the longer term if the qualification process was more straightforward and faster. The current measures the industry is taking to attract drivers such as increases in wages are likely to have a positive impact on demand, although there are many other underlying issues which have kept demand low, such as working conditions, lack of facilities and parking, and unsociable long working hours.
103. There may be further impact on motor insurance with the insurance industry reflecting the risk they have to bear from a potential increase in car/trailer collisions through increased premiums. We

are uncertain at this stage whether this will be the case given we do not have full data on whether the road safety risk will increase. The overall scale of the impact is expected to be small. We also do not know whether insurers will reflect this through individuals' premiums rather than an increase across all motor insurance. We are in discussion with the insurance industry and they are aware of the proposed accredited training scheme.

104. GB licences are currently recognised in Northern Ireland and this will continue under the new rules. Internationally, road traffic conventions cover licencing arrangements when drivers travel abroad. Some countries may feel concerned that there is a road safety impact from visiting drivers the further we move from the current licencing regime, particularly so in EU countries. We are in discussion at an international level to help mitigate this risk so that countries understand the changes being made and the implications for mutual recognition or exchange of licences.

105. The benefits of this regulation change are to help solve and alleviate short-term problems such as the backlog in driving tests that has accumulated due to lockdowns and the current lorry driver shortages. Their benefits lie within the short-term while the costs and any unintended impact, on safety or mutual recognition of GB licences abroad, are likely to be longer term. Furthermore, these measures are to free up DVSA's testing capacity in the short-run, this will likely result in having excess testing capacity and will have to eventually reduce the number of examiners back to some equilibrium after having ramped those up this year to tackle the backlog, which indicates these measures are only needed on a temporary basis.

4.0 Wider impacts

Innovation Test

106. It is not expected that these proposals would have any effect on innovation.

Small and Micro Business Assessment

Impacts of the regulation on businesses using BE vehicles

107. As explained in the Business Impact Target (BIT) accounting section, we do not expect many businesses to be impacted by this regulation.

108. Whilst it is unknown exactly how many businesses use BE licences to conduct business, it is sufficiently small that we have had no significant engagement from the industry. In addition, the licencing of drivers is usually something obtained by individuals, rather than as part of a business activity. This is explained in more detail in the BIT accounting section.

109. As this is a regulatory easement that does not require any action (beyond very small familiarisation costs) for a business to take advantage of, and as such, we do not believe there are specific barriers for small and micro businesses to take advantage of the regulatory easement.

110. One potential impact that could disproportionately affect Small and Micro Businesses (SMBs) would be if they are now less easily able to determine the relative quality of drivers who need to operate heavy trailers, as they won't hold a licence to demonstrate a basic level of competence.

111. We do not expect this to be a significant impact, as these licencing requirements only came in in 1997, meaning SMBs already need some mechanism to assess the quality of drivers who obtained their licence before 1997. In addition, no concerns were raised at consultation.

112. Finally, the BE test will still be optional and available to take, so a SMB could choose to unilaterally require this if they are unable to assess the quality of drivers internally as a bigger business may be able to. As above, this is unlikely to have any significant cost to the business (beyond reducing the available labour supply), due to (a) very small BE business use and (b) licencing and training is a cost that typically falls to the individual.

Impacts of the regulation on training providers

113. Removing the BE licence may reduce the amount of training undertaken by prospective drivers of heavy trailers, which will in turn impact those businesses providing that training.

114. These are the some 800 training organisations, sometimes employing small numbers of staff, who provide instruction to those training for the 29,400 BE tests conducted each year²⁶. Of those who described themselves as a training organisation or trainer when they responded to the consultation undertaken on these proposals, the following was the breakdown in terms of their business size. This shows 86% to be small or micro businesses. It is worth noting that this may underrepresent the total number of SMBs, as it may be the case that medium and large companies are more likely to respond to public consultations and will therefore be overrepresented in the below statistics.

Size of businesses from consultation respondents who were ‘A training organisation or a trainer’

	Micro – 1-9 employees	Small 10 – 49 employees	Medium 50 – 249 employees	Large – 250+ employees	-	Total
Numbers	381	66	31	42	3	523
Percentage	72.85%	12.62%	5.93%	8.03%	0.57%	100.00%

115. Some training companies who solely provide BE training could have significant negative distributional impacts as they may no longer operate as before, depending how individual drivers respond to the removal of mandatory BE licensing.

116. Whilst we note the significant distribution impacts here, they have not been assessed further as they do not fall within scope of the impacts counted under the Better Regulation Framework or under Green Book Guidance. This is because the revenue that training providers lose after this regulatory change would only have been generated as part of a requirement of the previous regulatory regime. Assuming a frictionless and competitive market where only normal profits are made, these training providers will lose revenue, but also gain back their time, meaning there is a net zero impact in cost-benefit analysis terms on training providers.

117. Additionally, training for BE is still expected to continue, as anecdotal evidence from the industry suggests that much BE training may continue due to “blue tape” requirements - perhaps from insurance, health and safety compliance, or as part of corporate responsibility – and also due to the accreditation scheme which will aim to incentivise uptake of training. There is no way of knowing the level of uptake in training within current circumstances as the details of the accreditation scheme are still being discussed. The take-up of the accreditation scheme will be monitored and reviewed within the Post Implementation Review (PIR).

Equalities Impact Assessment

118. These are enabling proposals and we have not identified a negative effect on those with protected characteristics. None of the proposals will result in discrimination of any kind, unlawful or otherwise,

²⁶ Based on DVSA data, and their stakeholder engagement with the training industry.

in terms of age, disability, sex, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, or sexual orientation.

Justice Impact Test

119. It is not considered that the regulation change will have a negative effect judicially.

Trade Impact

120. There is a risk that the removal of BE tests may be seen at international level, including in the EU, as a diminution of testing standards and therefore reduce confidence in GB testing integrity.

5.0 Post implementation review

1. **Review status:** Please classify with an 'x' and provide any explanations below.

<input type="checkbox"/>	Sunset clause	<input checked="" type="checkbox"/>	Other review clause	<input type="checkbox"/>	Political commitment	<input type="checkbox"/>	Other reason	<input type="checkbox"/>	No plan to review
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2. **Expected review date** (month and year, xx/xx):

1	0	/	2	4	Three and five years from when the Regulations come into force
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3. **Rationale for PIR approach:**

We advise that the level of evidence in this case should be high, and the PIR should be conducted at two time points – 3 and 5 years post implementation, even though the Total Net Present Social Value is zero due to the potential for negative safety implications. Reviewing at 3 years would enable us to get an early indication of emerging safety issues, which can inform policy interventions to respond, including modifications to the accreditation scheme. The impacts should be reviewed again at 5 years, given road safety impacts can take time to realise. Though this would place a greater commitment on the Department, given the uncertainty about the impact of the measure, it would be a prudent approach. Many concerns raised in the consultation are safety related, so doing this additional review could help to reassure stakeholders. The reviews will also consider the impact of the policy on its key objective, to increase DVSA lorry testing capacity in order to reduce the lorry driver shortage. The reason behind the 3 year review is that it will take time for impacts of the regulation change to start showing within the data collected, and doing a review anytime sooner would likely not find anything – whereas a 3-year review should be able to give an early indication of impacts.

- **What forms of monitoring data will be collected?**

The following existing sources of data will be explored for the PIR

- DVSA testing data (current vocational and data on BE test prior to the regulation change)
- STATS19 reported road casualty data

The PIRs will consider new monitoring data on drivers completing the trailer accreditation scheme.

We will also consider new data collection, likely through:

- Surveys or interviews with drivers who tow trailers
- Surveys and interviews with examiners, trainers and employers

- Stakeholder consultation
- Surveys or interviews with lorry drivers

Further scoping will inform whether these projects are feasible (e.g. whether there are data protection issues), whether they will provide suitable sample sizes and comparator groups for analysis, and whether the cost to achieve results is proportionate.

More information about the rationale for the use of these sources is outlined below:

For **safety impacts**,

- the STATS19 reported road casualty data should be explored when conducting the PIR, to see whether there has been an increment of accidents involving lorries following this measure.
- Data on drivers completing the new accreditation scheme should be considered, comparing with data on drivers completing the BE test prior to the regulation change, to understand the extent of the coverage of this scheme.
- Potentially, investigatory data from the existing RAIDs study, current ongoing Road Collision Investigation Project and the potential new collision investigation branch could also be used to examine safety impacts.
- We will also explore undertaking new data collection, namely surveys with drivers, examiners and employers/ trainers to understand drivers’ knowledge and behaviour which can be an indicator of potential safety issues, but as flagged above this is subject to further scoping work.

To explore **impact on DVSA testing capacity**, the PIR should consider DVSA data on number of tests available and waiting times for tests. Though additional data from the Annual Population Survey on the current numbers of working lorry drivers could in theory be used to consider impacts on the numbers of working lorry drivers, to assess whether the policy contributed to reducing the lorry driver shortage, we do not recommend this is part of the PIR. Lorry driver shortages will be influenced by other external factors and other policies so it will not be possible to attribute the impact of this specific measure alone on numbers of lorry drivers. Therefore, to assess whether the policy contributed to this we will focus on the key aspect of this it is seeking to influence – DVSA vocational testing capacity – however we will also explore the feasibility of conducting surveys with stakeholders, employers, trainers and drivers in order to consider the influence of the increased testing capacity on entry to the lorry driver profession.

To monitor whether this measure has had an impact on mutual recognition of GB licences internationally, we will explore industry stakeholders’ opinion and feedback through surveys.

- **What evaluation approaches will be used? (e.g. impact, process, economic)**

Impact evaluation, considering observed safety data, potential safety impacts and impacts on vocational testing capacity.

New primary data sources will be necessary to understand the impact on some interim outcomes, i.e. indications of driver behaviour and volume of training conducted. We will explore conducting surveys and interviews with drivers, employers and examiners to investigate this.

- **How will stakeholder views be collected? (e.g. feedback mechanisms, consultations, research)**

DVSA examiners, drivers, wider motoring stakeholders, and potentially, employers and trainers consulted via surveys and interviews.

Rationale for not conducting a PIR:

N/A

Key Objectives, Research Questions and Evidence collection plans			
Key objectives of	Key research questions to measure success of objective	Existing evidence/data	Any plans to collect primary data to answer questions?

the regulation(s)			
Contribution to reducing driver shortage	Has the DVSA backlog in driving tests been reduced?	Backlog in tests (DVSA vocational test data)	Wider stakeholder consultation Subject to feasibility, survey / interviews with lorry drivers and examiners (plus potentially trainers and employers)
Maintain Road Safety	Are drivers who tow a trailer without BE test more likely to have accidents? To what extent has the establishment of the accreditation scheme mitigated against any safety risks from the removal of the BE test?	STATS19 casualty data Records of drivers completing BE test prior to regulation change (including information on reasons for failure) (DVSA test data)	Subject to feasibility, survey / interviews with drivers and examiners (plus potentially trainers and employers) Records of drivers completing new accreditation scheme (including numbers engaging)
Maintain mutual recognition of GB licences internationally	Has this measure had an impact on mutual recognition of GB licences internationally?	n/a	Wider stakeholder consultation Potentially, survey / interviews with drivers and possibly employers

Annex A: Summary tables of Serious and/or Dangerous faults causing failure of BE tests between 2016/17-2019/20

Top 10 serious or dangerous (S+D) faults causing failure of the BE test (where there can be more than one fault per test) between financial years 2016/17 and 2019/20:

	Manoeuvre	S+D total faults	% of total S+D faults
1	Reverse left - Control	8388	13.33%
2	Uncouple / recouple	8179	13.00%
3	Junctions - observation	4412	7.01%
4	Mirrors - change direction	3091	4.91%
5	Move off - safely	3016	4.79%
6	Junctions - turning right	2701	4.29%
7	Response to signs - traffic lights	2646	4.21%
8	Use of speed	2640	4.20%
9	Reverse left - Observation	2303	3.66%
10	Response to signs - road markings	2231	3.55%

Top 10 S+D faults causing failure of BE tests grouped by manoeuvre for the same financial years:

	Manoeuvre	S+D total faults	% of total S+D faults
1	Junctions	10740	17.07%
2	Reversing & reverse parking	10708	17.02%
3	Response to signs	8255	13.12%
4	Uncouple/recouple	8179	13.00%
5	Mirrors	5084	8.08%
6	Move off	4094	6.51%
7	Positioning	2841	4.52%
8	Use of speed	2640	4.20%
9	Maintain progress	2271	3.61%
10	Judgment	2021	3.21%