



Department  
for Transport

# Driver Certificate of Professional Competence

## Post Implementation Review

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## Executive Summary

This document is a Post-Implementation Review (PIR) of the Driver Certificate of Professional Competence Regulations.

In 2007, the UK transposed an European Directive (Directive 2003/59/EC) using The Vehicle Drivers (Certificates of Professional Competence) Regulations 2007. The Regulations require compulsory initial training and periodic retraining of drivers engaged in the carriage of goods or passengers by road for when they are driving lorries of all sizes, buses, minibuses or coaches.

Besides holding a driving licence, the Directive introduced a requirement for all drivers of Large Goods Vehicles (LGV) and Passenger Carrying Vehicles (PCV) to hold a Certificate of Professional Competence (CPC) obtained by completing an initial detailed test, with periodic re-training every five years. Existing licence holders were excused the initial qualification so that holders of passenger carrying vehicles (i.e. buses, coaches and minibuses) had five years up to 10 September 2013 to complete 35 hours of periodic training and lorry drivers until 10 September 2014.

The aims of the changes were to increase the professionalism of such drivers, ensuring their skills were regularly updated, leading to improved road safety and standardising driving levels across Europe. It was also intended that CPC would help drivers meet the demands arising from the developments in the road transport market. Furthermore, it was envisaged that modernising and professionalising the industry in this way could encourage more young people in to the industry, contributing to the recruitment of new drivers.

The post-implementation review assesses a range of evidence concluding that:

- There is clear evidence that drivers are undertaking continuous professional training that should contribute to their skill levels;
- There is some indication that earnings in the affected occupations have outperformed the broader occupational class since the introduction of the CPC but this does not appear to have been accompanied by increased inflows to the occupations;
- Safety outcomes have improved, but improvement has been seen across the board and safety trends were positive well before the introduction of the CPC;
- On balance, firms' views of the CPC are more positive than negative but there is limited evidence on precisely how they have been affected, something that is also true of competition across the EU; and
- There may have been some unintended consequences from the periodic training requirement which may have dissuaded existing licence holders and drivers near to retirement with expired acquired rights from obtaining a Driver Qualification Card (DQC).

Based on the available evidence, coupled with the continuing validity of the objectives of the regulations, the PIR recommendation is for the regulations to remain in place.

## **1. Introduction**

This document is a Post-Implementation Review (PIR) of the Driver Certificate of Professional Competence Regulations. The PIR begins by outlining the background to the regulations, including the regime that existed before their introduction, and the objectives that the regulations sought to achieve.

The next section describes the background to the PIR itself including the reason it has been carried out, the proportionality assessment conducted to determine the level of evidence sought as well as the research questions and approaches used to fulfil this evidence requirement. The remainder of the PIR provides the evidence gathered. It is structured into four main sections:

- Implementation Evidence: this provides evidence on the implementation of the regulations.
- Outcome Evidence: this provides evidence on outputs and outcomes linked to the regulations. It describes the extent to which any changes in outputs and outcomes can be attributed reasonably to the regulations.
- Economic Evidence: this provides estimates of the actual costs of the regulations and assesses the level of benefits that would be required to offset these costs.
- PIR recommendation: this justifies the main recommendations derived from the PIR and explains the next steps for the regulation.

On 23 June 2016, the EU referendum took place and the people of the United Kingdom voted to leave the European Union. Until exit negotiations are concluded, the UK remains a full member of the European Union and all the rights and obligations of EU membership remain in force. During this period, the Government will continue to negotiate, implement and apply EU legislation. It will be for the Government, under the Prime Minister, to lead negotiations to exit the EU. The outcome of these negotiations will determine what arrangements apply in relation to EU legislation and funding in future once the UK has left the EU.

## **2. Policy Background – the Driver Certificate of Professional Competence**

This section explains the policy background to the Driver CPC including the legislative background and the changes that resulted from the regulations. It aims to give readers the background knowledge needed to understand the rest of the PIR.

### **2.1. Legislative Background to the Driver Certificate of Professional Competence**

In 2007, European Directive 2003/59/EC (“the Directive”) was transposed into UK legislation by The Vehicle Drivers (Certificates of Professional Competence) Regulations 2007 SI No. 605 [as amended] (the “CPC Regulations”).

The Directive required<sup>1</sup> that drivers engaged in the carriage of goods or passengers by road undergo compulsory initial training and periodic retraining for when they are driving lorries of all sizes, buses, minibuses or coaches<sup>2</sup>.

The Directive was not reserved to Westminster, but at the request of colleagues in Northern Ireland (NI), the regulations were drafted to apply UK-wide. This transposition occurred following a full, UK-wide public consultation.

Implementation of the CPC Regulations took place in September 2008 for bus and coach drivers and September 2009 for lorry drivers. This was in accordance with the deadlines originally set in the Directive.

A number of changes have been made to the domestic regulations since they originally came in to force. It was the amendments to the CPC Regulations introduced in 2011 by Statutory Instrument 2011/2324 which included a review clause for the CPC regulations to be reviewed by 2016, hence the Government has produced this PIR.

This review has been completed in conjunction with colleagues in Northern Ireland.

In addition to the amendments that introduced the review clause, there have been a number of other amendments, the most significant of which are listed in *Annex B: Main Legislative Amendments*.

## **2.2 Summary of Principal Changes Brought about by the Directive**

The table below summarises the policy regimes in effect before and after the Directive was implemented.

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<sup>1</sup> Full details of the Directive can be found here: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32003L0059>

<sup>2</sup> Lorries, over 3.5 tonnes in weight, also referred to as LGVs, are grouped under the vehicle category 'C'. Buses and coaches, also referred to as PCVs, are grouped under the vehicle category 'D'.

**Figure 1:** Summary of Principal Changes Brought about by the Directive

	<b>Before the Directive</b>	<b>After the Directive</b>
Required Qualifications	<p>A full car driving licence and relevant provisional entitlement (for either category C or D).</p> <p>Proof of medical fitness to drive a large vehicle.</p> <p>Completion of two licence acquisition tests:</p> <ul style="list-style-type: none"> <li>- a computer-based multiple choice test</li> <li>- a practical in-cab driving test with an appointed examiner.</li> </ul> <p>Tests are aligned with an EU syllabus (the 2<sup>nd</sup> Directive on Driving Licences).</p>	<p>A full car driving licence and relevant provisional entitlement (for either category C or D).</p> <p>Proof of medical fitness to drive a large vehicle.</p> <p>Completion of four theory and practical tests to obtain the vocational licence and the CPC:</p> <ul style="list-style-type: none"> <li>- Module 1: theory test made up of a multiple choice part and an hazard perception part</li> <li>- Module 2: case studies</li> <li>- Module 3: practical driving ability test</li> <li>- Module 4: practical demonstration test.</li> </ul> <p>Evidence of having the required qualifications comes from holding a DQC.</p> <p>Tests are aligned with an EU syllabus (the CPC Directive).</p> <p>The existing licence acquisition test already covered 80% of what the CPC Directive was proposing. The test was lengthened to include elements of the CPC test which share the same competencies. In addition, dedicated CPC tests were also designed to cover the 20% of the Directive's requirements not covered by the licence acquisition test.</p>
Required Continuous Training	No requirement for further training once qualified.	Periodic training of 35 hours every 5 years required.
Delivery of Training	Trainer required to hold relevant licence. Content of training generally related to driving test assessment criteria.	<p>Trainer required to hold relevant licence if delivering practical in-vehicle training</p> <p>No prescription regarding the content, type or duration of training delivered before acquisition of the IQ Driver CPC as training generally related to driving test assessment criteria.</p> <p>Post- IQ training must be delivered by an approved training centre and must be in periods of at least seven hours. The content of training must link to the prescribed CPC syllabus.</p>
Minimum Age	21	18 (if you are driving professionally only).
'Grandfather' rights.		Vocational drivers, who already held their Category C or D licence at the time of the introduction of the CPC Regulations, were not

	<b>Before the Directive</b>	<b>After the Directive</b>
		required to undertake the Initial Qualification. Instead they only needed to undertake their periodic training and acquire a DQC. Existing drivers were granted a five-year period, from the start of CPC, in which to do this.

## 2.2. Policy Objectives of the Directive

The primary objectives<sup>3</sup> of the Directive were to:

- improve road safety and driver safety;
- improve the professionalism and the quality of service offered by professional drivers; and
- contribute towards lessening driver shortages.

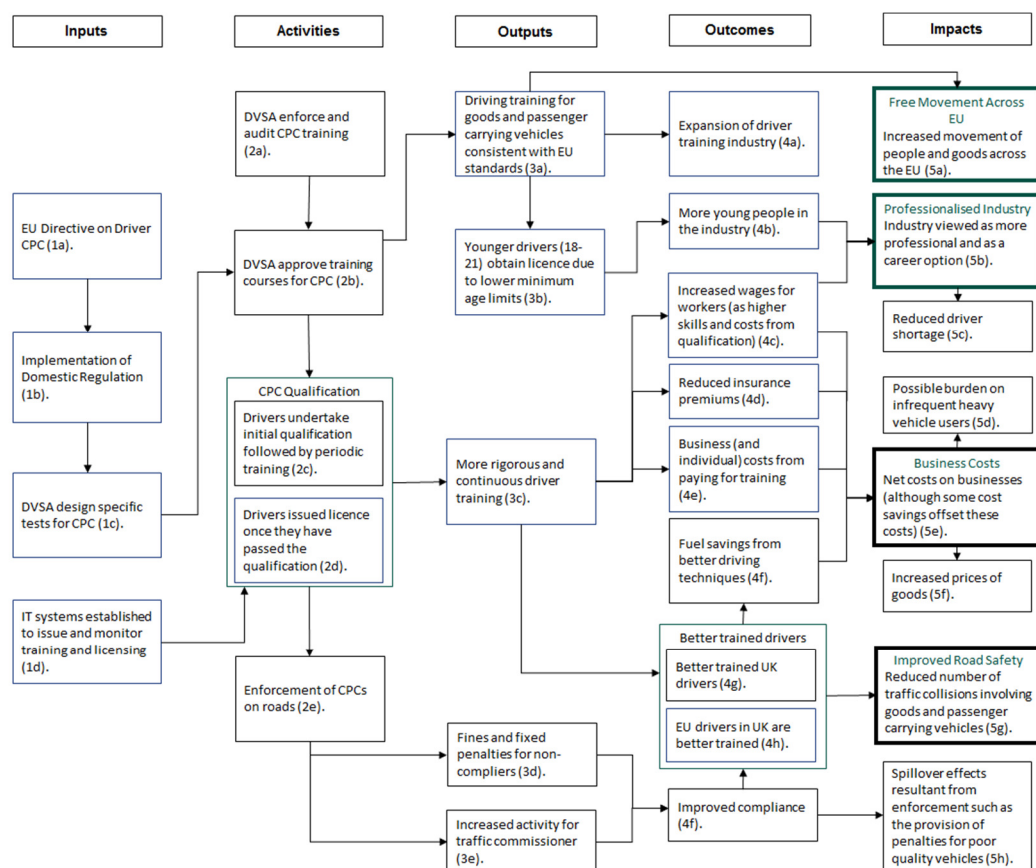
The UK did not add any additional objectives to those of the Directive.

The following logic map sets out the assumed causal mechanisms through which implementation of the Directive is expected to contribute to these main objectives. Although the main documentation such as the explanatory memorandum, impact assessment and the Directive itself do not state when impacts were expected to materialise it seems reasonable to assume the regulations should by now be starting to show some influence. One reason for this is that all drivers that initially had grandfather rights have now had to complete their periodic training to retain these rights and consequently will have been affected by the regulations.

<sup>3</sup> <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32003L0059&from=EN> (paragraphs 3 to 5)  
[http://www.starts.iru.org/cms-filesystem-action?file=/starts\\_1\\_GB\\_10\\_12\\_BD.pdf](http://www.starts.iru.org/cms-filesystem-action?file=/starts_1_GB_10_12_BD.pdf)



**Figure 2: Logic Map for the Driver Certificate of Professional Competence**



Context: The EU Directive was implemented to improve road safety and the safety of drivers, standardising skill levels and ensuring the free movement of drivers within the EU and the road transport sector.

### 3. Post-Implementation Review Background

This section explains the background to the PIR including the approach taken and the justification for this. It aims to help readers understand the approaches the PIR uses and why these approaches were selected.

#### 3.1. The PIR Requirement

As stated in section 2.1, amendments to the CPC Regulations were introduced in 2011 by Statutory Instrument 2011/2324<sup>4</sup>. This Statutory Instrument included a clause mandating that the CPC regulations were reviewed by 2016. This PIR therefore covers the full set of CPC Regulations<sup>5</sup>, rather than just the 2011 amendments. At the time of making the initial 2007 Regulations, such reviews were not common practice and review plans were not built into the 2007 Regulations.

#### 3.2. Proportionality Assessment for the PIR

A medium level of additional evidence has been sought for this PIR. This is because there is good availability of secondary data and the CPC Regulations have previously been

<sup>4</sup> [http://www.legislation.gov.uk/uksi/2011/2324/pdfs/uksi\\_20112324\\_en.pdf](http://www.legislation.gov.uk/uksi/2011/2324/pdfs/uksi_20112324_en.pdf)

<sup>5</sup> [http://www.legislation.gov.uk/uksi/2007/605/pdfs/uksi\\_20070605\\_en.pdf](http://www.legislation.gov.uk/uksi/2007/605/pdfs/uksi_20070605_en.pdf)

subject to ex-post evaluations commissioned by the Driver and Vehicle Standards Agency (DVSA) and the European Commission (EC) respectively. A light-touch approach has therefore been taken, drawing on this pre-existing data to avoid duplication of work. This is in line with the Cross-Government Evaluation, Regulatory Policy Committee (RPC) Secretariat and Better Regulations Executive (BRE) Group PIR Guidance<sup>6</sup> which states that “If the scope and quality of the existing evidence base and monitoring data is already high, little new data collection may be needed”.

It is also the case that some of the options for additional primary data that could feasibly have been collected would not have improved the quality of evidence to a sufficient extent to justify the additional expenditure.

The original impact assessment estimated the annual cost of the Directive, as implemented (including only the Initial Qualification and Periodic Training elements), at £209m<sup>7</sup>. The level of detail in this PIR is warranted as these costs are quite substantial.

### 3.3. Identification of Research Questions for the PIR

The main research questions identified for the PIR are outlined in the table below. They were determined both by a review of the PIR template in the PIR guidance and by the development of a logic map for the Directive. The table lists the high-level research questions but the more detailed underlying questions can be found in *Annex A*.

**Figure 3: PIR Research Questions**

PIR Element	Overarching Questions
Implementation Evidence	What options were available to the UK within the Directive?
	What choices were taken?
	How do these choices compare with other Member States?
	Did the implementation of the UK regulation avoid gold plating?
	Which public bodies were involved in implementing the Directive?
Outcome Evidence	Was the Implementation successful?
	How have the regulations affected driver training and skills?
	How have the regulations affected the drivers and the driver labour market?
	How have the regulations affected road safety?
	How have the regulations affected businesses?
	How have the regulations affected competition in the industry across the EU?
Economic Evidence	Have the regulations had any unintended consequences?
	What were the costs of the regulations?
	What were the benefits of the regulations?
PIR Summary	How do these costs and benefits compare to initial estimates?
	Have the regulations achieved their objectives and are these objectives still valid?
	What is the recommended course of action for the regulations?
	What will the next steps relating to the regulation be?
	Are there any lessons for impact assessments from this PIR?

<sup>6</sup> Cross Government Evaluation Group, RPC Secretariat and BRE (2015) GUIDE FOR CONDUCTING POST IMPLEMENTATION REVIEWS, V6, Revised Draft August 2015 (Awaiting Publication)

<sup>7</sup> In 2015 prices, as explained in Section 6.

### 3.4. Research Methodologies Used in the PIR

The research methodologies used in this PIR, are described below.

**Figure 4: PIR Research Approach**

<b>Methodology</b>	<b>Description</b>
Literature Review <sup>8</sup>	<p>The main sources reviewed have included:</p> <ul style="list-style-type: none"> <li>- The FTA 2015 Logistics Report.</li> <li>- The 2014 Panteia Ex-post evaluation study report.</li> <li>- The 2014 Panteia report on the CPC stakeholder conference.</li> <li>- The 2012 AFT-IFTIM/ETF/IRU Survey on Driver Training Issues.</li> <li>- The 2012 EC Report on implementation of the Directive.</li> <li>- The DSA 2011 'Driver CPC Evaluation Report' July.</li> <li>- The AECOM/DSA 2012 'Driver Certificate of Professional Competence Interim Evaluation' report.</li> <li>- The 2013 DSA public consultation 'Review of the Driver Certificate of Professional Competence' and response to consultation.</li> </ul>
Stakeholder consultation	<p>The main source of stakeholder views cited in the PIR is the 2012 AECOM/DSA evaluation (though this has been supplemented by other sources outlined below). The 2012 evaluation involved both qualitative interviews and quantitative surveys with operators and drivers in the PCV and LGV sectors. The research activities involved firms across a range of sub-sectors and with varying levels of employment. This means it should have a degree of representativeness but this is caveated by the relatively low sample sizes for the quantitative surveys (111 operators and 216 drivers respectively).</p> <p>Additional sources of information on stakeholder views include:</p> <ul style="list-style-type: none"> <li>- The initial DSA consultation on the broad options for implementation of the CPC in 2005/06. This consultation attracted 90 responses<sup>9</sup>. Further consultations were carried out which informed legislative changes that were introduced from 2007 to 2014.</li> <li>- The 2013 EC consultation which DVSA carried out on behalf of the UK government. This consultation attracted 395 responses<sup>10</sup>.</li> <li>- Meetings of the Vocational Testing &amp; Training Advisory Group. These meetings include industry representatives and take place approximately every six months with DVSA.</li> </ul>
Secondary data analysis	<p>Secondary data covering the following topics have been used in the PIR:</p> <ul style="list-style-type: none"> <li>- CPC Training (course and centre approvals, training hours)</li> <li>- CPC Testing (tests conducted, pass rates)</li> <li>- CPC Enforcement (sanctions used)</li> <li>- CPC Awareness (survey data)</li> <li>- DQC Issuance (initial qualification and periodic training routes)</li> </ul>

<sup>8</sup> Full references can be found in Annex B.

<sup>9</sup> [http://www.legislation.gov.uk/uksi/2007/605/pdfs/ukxiem\\_20070605\\_en.pdf](http://www.legislation.gov.uk/uksi/2007/605/pdfs/ukxiem_20070605_en.pdf)

<sup>10</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/261162/driver-cpc-call-for-evidence-report.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/261162/driver-cpc-call-for-evidence-report.pdf)

Methodology	Description
	<ul style="list-style-type: none"> <li>- Driver wages</li> <li>- Driver employment</li> <li>- Driver demographics</li> <li>- Road Accidents</li> <li>- Sectoral structure</li> <li>- Cabotage penetration</li> </ul>
Break-Even Analysis	The actual costs of the regulation have been estimated and an assessment of the level of benefits that would be required to offset the estimated costs has been made.

## 4. Implementation Evidence

This section provides the evidence relating to the implementation of the regulations. It aims to explain the choices made around implementation, the organisations involved and the extent to which implementation was successful.

### 4.1. What options were available to the UK within the Directive? What choices were taken? How do these choices compare with other Member States?

The principal options that were available within the Directive were as set out below.

**Figure 5:** Options and Choices within the Directive

Option	UK Approach	Approach in Other EU States <sup>11</sup>
Whether to use: <ul style="list-style-type: none"> <li>- a test-only approach</li> <li>- a test and training approach (including accelerated access option for the initial qualification)</li> </ul>	<p>The UK selected the test only approach to reduce the burden on the industry. Stakeholders supported this approach<sup>12</sup>.</p> <p>Under the test and training approach, the minimum amount of pre-test training was specified at 280 hours or seven 40-hour weeks. This was deemed too burdensome on business and on individuals.</p> <p>The UK opted to split the test into four modules. This allowed vocational drivers who do not need a full CPC to take a subset of the modules to gain their vocational</p>	<p>AT, BE, CY, GR, IE, LV, MT, NL, PT and RO all took the test only approach.</p> <p>BG, CZ, DK, EE, ES, FI, FR, HU, IT, LT, LU, PL, SE, SI and SK took the test and training approach.</p> <p>DE implemented both approaches<sup>13</sup>.</p>

<sup>11</sup> A list of Country Codes is at Annex E

<sup>12</sup> <https://www.gov.uk/government/consultations/effectiveness-of-driver-cpc-call-for-evidence>

<sup>13</sup> Panteia (2014)

Option	UK Approach	Approach in Other EU States <sup>11</sup>
	licence. These drivers could subsequently take the additional modules if they changed job and required a full CPC at a later date.	
How long drivers holding grandfather rights had to complete their first amount of periodic training	The UK opted to give drivers with grandfather rights a five-year period to complete their periodic training, as the existing licence renewal triggers (age 45 when a driver has to renew their medical to prove their fitness to continue driving professionally, and ten years after a photocard driving licence has been issued, when a renewal must be issued) did not fit with the Directive's requirements of three to seven years.	The idea was to align this with the driving licence expiry periods applicable in each Member State. The maximum allowable period was seven years and a number of EU states opted to take this approach (BE, ES, NL, PT, SE) The minimum period was three years. Five years was the mid-point and recommended in the Directive if no other expiry period applied. There were a significant number that used the same approach as the UK (AT, BG, CZ, DE, DK, FI, GR, HU, IE, IT, LT, LV, PL, SI, SK) <sup>14</sup>
How to arrange the 35 hours every five years of periodic training.	The Directive only specifies that periodic training has to be 35 hours every five years given in periods of at least seven hours. The UK opted to specify the minimum amount of training over a five-year period rather than a minimum amount per year, which some countries chose. This approach was taken to give drivers and firms the flexibility to make the choices that work best for them.	At least one country is reported to have set minimum annual training requirements. This is CZ which specifies at least one session of seven hours each year <sup>15</sup>
Whether to specify the number of sessions into which the periodic training is provided	The UK opted not to specify the number of sessions the training has to be delivered in (subject to sessions being a minimum of seven hours, as specified in the Directive).	The majority of member states took the same approach as the UK but BG, EE, FR, GR and HU specified that training must be on consecutive days.
Whether to: - Have a separate DQC	The UK opted to issue a separate DQC that is mandatory for drivers to carry when working. This option	AT, DE, GR, LT, LV, MT, NL and PL added the qualification details to driving licences while the other member states issued

<sup>14</sup> Panteia (2014)

<sup>15</sup> Panteia (2014)

Option	UK Approach	Approach in Other EU States <sup>11</sup>
- Include qualification details on the standard driving licence	was selected to ease enforcement and because it is not mandatory for drivers to carry their driving licence in the UK.	separate DQCs (or allow both approaches).
Whether to increase the minimum age (as a different Directive, 2006/126/EC, has higher minimum ages).	The UK opted to use the minimum age of 18 from the Directive covered in this PIR.	HU, IT, LV and SK use the higher minimum ages from 2006/126/EC of 21 and 24 years.
Whether to specify that all the syllabus areas in the Directive had to be covered.	The UK adopted a flexible approach to enable drivers and businesses to select courses best suited to the drivers' needs.	Nine Member States took a different approach and mandated that drivers had to cover all syllabus areas, such as BE, CZ, FR and IE.

#### 4.2. Did the implementation of the Directive in to UK regulation avoid gold plating?

As Figure 5 outlines, the UK took the least burdensome options that afforded drivers and firms the greatest flexibility. The only exceptions were the decision to require drivers to hold a separate DQC rather than adding details to their existing licences, and the amount of time drivers with grandfather rights had to complete their periodic training, where a period of five years, lower than the maximum of seven, was chosen because the UK did not have an automatic renewal period, for driving licences, to align with. The Directive stated that this period must be between three and seven years. The UK chose five years as the midpoint because no other period applied.

In addition to avoiding gold plating by selecting the least burdensome options in most cases, it is also the case that many of the options chosen were supported by stakeholders, including the five-year period for drivers with grandfather rights. For example, the test-only approach was supported by stakeholders and this was reinforced by those that responded to the 2013 consultation<sup>16</sup>. The use of separate DQC cards was a choice made to facilitate enforcement of the regulations.

#### 4.3. Which public bodies were involved in implementing the Directive?

There were a number of public bodies involved in implementing the Directive. Their main responsibilities are described below.

##### 4.3.1. The Department for Transport/The Department of Environment (DoE) for Northern Ireland

The Department for Transport oversaw the implementation of the Directive, helping to co-ordinate between the other agencies involved.

<sup>16</sup> <https://www.gov.uk/government/consultations/effectiveness-of-driver-cpc-call-for-evidence>

#### 4.3.2. The Driving Standards Agency (now merged with VOSA to form the Driver and Vehicle Standards Agency) in GB and The Driver & Vehicle Agency (DVA) in NI.

The Driving Standards Agency (DSA) and DVA carried out the initial consultation covering the broad options for implementation. This consultation attracted 90 responses, including those of major stakeholders such as the Road Haulage Association, the Freight Transport Association and the Sector Skills Councils. These responses were used to guide decisions (including those outlined in Figure 5) made by the DSA and DVA on how to transpose and implement the Directive.

The DSA and DVA were responsible for raising awareness of the change and promoting the CPC. It also had a range of responsibilities relating to testing and training as it was responsible for the tests. DSA and DVA designed the test modules used for the CPC in cooperation with stakeholders and contracted providers to offer the non-practical elements of the test.

DSA and DVA were responsible for approving training centres (although a third party carries out the assessment of the applications and makes recommendations for approval to the Agency) and carrying out a programme of auditing on the training centres. DSA also recorded the training progress of drivers, following payments from the training centres.

The final role of the DSA and DVA was to issue DQCs in conjunction with DVLA. These ongoing functions are now performed by the DVSA.

#### 4.3.3. The Vehicle and Operator Services Agency (now merged with DSA to form the Driver and Vehicle Standards Agency)

The Vehicle and Operator Services Agency (VOSA) and DVA were responsible for performing checks on operators and issuing fines for non-compliance. VOSA also had responsibility for licencing the operators of lorries, buses and coaches. These ongoing functions are now performed by the DVSA.

Like the DSA and DVA, VOSA also contributed to raising awareness of the CPC and promoting it to stakeholders.

#### 4.3.4. The Joint Approvals Unit for Periodic Training (JAUPT)

The Joint Approvals Unit for Periodic Training is a body that was set up by the industry sector skills councils (GoSkills and Skills for Logistics) to manage the administrative processes associated with approving training centres and courses. As mentioned above, the non-administrative aspects were performed by the DSA and DVA.

#### 4.3.5. The Driver and Vehicle Licensing Agency

The Driver and Vehicle Licensing Agency is responsible for recording licence holding and sending out DQCs on the behalf of DVSA (formerly DSA).

#### **4.4. Was the Implementation Successful?**

Based on the logic model for the Driver CPC (see Figure 2), successful initial implementation needed to ensure that the arrangements for testing, training and enforcement were in place and that stakeholders had a suitable degree of awareness of the changes taking place.

##### **4.4.1. Testing**

DSA and DVA developed a four module test to obtain the vocational licence and CPC. This allowed the pre-existing licence acquisition test to be counted towards the acquisition of the CPC. The pre-existing licence acquisition test itself made up 80% of the content of what the Directive was proposing for the CPC; including the existing UK tests avoided significant duplication of effort and prevented drivers and businesses facing unnecessary additional costs.

The test specification was finalised and providers were in place by the time the regulations came into force.

The DSA and DVA phased in the longer multiple-choice test papers between April 2007 (when the number of questions was increased to 60) and April 2008 (when the number of questions was increased to 100). This was intended to help mitigate the risk of a sudden drop in pass-rates affecting the flow of new drivers when the CPC was introduced, which it did – as shown in Figure 11 and Figure 12 in Section 5.

##### **4.4.2. Training**

The Joint Approvals Unit for Periodic Training (JAUPT) was established in February 2007. JAUPT is a limited company, registered in the UK, originally established by the industry sector skills councils – GoSkills and Skills for Logistics. JAUPT is now governed by People 1st Group who amalgamated with GoSkills.

JAUPT manages the administrative process for recommending the approval of and for the quality assurance of centres delivering Periodic Training and of courses. The ultimate authority of granting/withdrawing approval lies with the DVSA (formerly DSA) and DVA.

Potential training bodies must pay a fee of £1,500 to be registered as an approved training centre. Approval lasts for five years and can also be suspended if the conditions of approval are not met. Potential centres are asked to state how their organisation will operate in a professional and consistent manner to give DVSA and DVA confidence in their ability to provide Driver CPC periodic training.

DVSA and DVA carry out risk-based auditing of CPC trainers and courses to establish their continued compliance.

As Figure 6 shows, from the point when the regulations were first implemented there has always been a large number of approved courses and training centres facilitating compliance with the regulations.



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**Figure 6: Approval of Training Course and Centres**

<b>Financial Year</b>	<b>New Courses Approved</b>	<b>New Training Centres Approved</b>
2008/9	514	271
2009/10	1,883	559
2010/11	2,419	233
2011/12	2,976	163
2012/13	3,492	203
2013/14	4,016	333
2014/15	3,575	409
2015/16 (as of Jan 2016)	2,705	163

Source: DVSA

#### 4.4.3. Enforcement

DVSA (and prior to that VOSA) are responsible for enforcing compliance with the CPC by performing checks on operators and drivers. Traffic Commissioners (DVA in NI) are responsible for issuing fines and other sanctions for non-compliance. Enforcement is targeted on operators perceived as high-risk and is facilitated by the decision to issue a separate DQC (rather than including qualification details on the existing driving licence).

The 2012 Interim Evaluation of the CPC looked at the issue of enforcement and of non-compliance with the periodic training requirements. It reported that some drivers were unconvinced that the deadline for completion of periodic training for those with acquired rights would be enforced. The 2012 report also suggested that the slowness of the audit process initially contributed to compliant firms feeling disadvantaged. However, once the audit process was better established, it was felt to be working relatively well.

Enforcement data suggests that enforcement activity has been taking place throughout the period following the implementation of the CPC. Years 2013-14 (for category D) and 2014-15 (for category C) were when the deadlines fell for completion of periodic training for acquired rights holders.

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**Figure 7: Enforcement of Driver CPC**

<b>Financial Year</b>	<b>Offences Resulting in Graduated Fixed Penalties and Deposits</b>		<b>Offences not Resulting in Graduated Fixed Penalties and Deposits</b>	<b>Total Offences</b>
	No Evidence of Training or Exemption	No Initial or Periodic Training		
2009/10	2	0	1	3
2010/11	4	0	1	5
2011/12	14	0	10	24
2012/13	48	0	18	66

2013/14	120	3	98	221
2014/15	624	17	373	1,014
2015/16 (up to September 2015)	406	4	172	582

Source: DVSA

There is some indication that this enforcement activity has been successful as levels of compliance are high. DVSA figures show that over 99% of lorry drivers stopped during roadside checks had completed their Driver CPC periodic training – this is based on enforcement data in the first twelve months of CPC becoming compulsory for all professional lorry drivers (Sept 2014 to Sept 2015).

#### 4.4.4. Awareness

DSA and VOSA (now DVSA), and DVA in NI, were initially responsible for raising awareness of the CPC and did this through issuing a number of consultations as well as through specific communication campaigns. For example, the DSA wrote to 3,000 potential stakeholders as part of the 2005/06 consultation on the broad options for implementation of the Directive.

Despite these activities, the 2012 Interim Evaluation reported that awareness and understanding of the CPC was viewed as insufficient among larger stakeholders including the Police, Traffic Commissioners, the Road Haulage Association (RHA), the Freight Transport Association (FTA) and the Sector Skills councils amongst others. A key factor behind this reported lack of awareness was the structure of the industry which features many small operators that are hard to reach even through trade publications. However, the Evaluation also reported that, amongst day-to-day operators and drivers, there was a high level of awareness. There was mixed opinion, though, from operators regarding whether sufficient publicity had been carried out to promote the changes, but the majority thought that it had.

Prior to implementation, DSA commissioned repeat surveys of LGV Voluntary Register trainers<sup>17</sup> which also showed increasing levels of awareness with over half of the respondents reporting that they felt informed about the forthcoming Driver CPC Directive.

**Figure 8: Awareness levels among LGV Voluntary Register Trainers: Responses to the question “How informed do you feel you are about the forthcoming Driver CPC (Certificate of Professional Competence) Directive?”**

Date of Survey	Proportion of responses answering “very well informed” or “fairly well informed”
March 2007	35%
August 2007	42%
July 2008	53%
October 2009	56%
March 2010	56%

Source: DSA/ Ipsos Mori Instructor Satisfaction Surveys

<sup>17</sup> The DVSA administers a voluntary register of trainers providing LGV tuition.

There is also some evidence on awareness from Skills for Logistics who covered the topic in their 2009 'Employer Forum – Driver CPC Consultation'. They found that all employers<sup>18</sup> had some level of awareness with 59% feeling “fully aware”, 39% “reasonably aware” and only 2% “not really aware”.

Overall, therefore, levels of awareness appeared to be mixed, perhaps as a result of the industry structure and the fact that existing drivers were afforded acquired rights.

#### 4.4.5. Perceptions of implementation

The 2012 CPC Interim Evaluation includes the results from a survey of operators that covered a range of topics. One question asked “Driver CPC was introduced to improve the overall standard for vocational drivers. Do you agree this has been successfully delivered?” and the responses suggest a mixture perception of implementation (though the question is quite vaguely worded) with around 40% agreeing with the statement compared to 31% disagreeing (and 29% providing a neutral response).

In summary, most of the elements of successful implementation were in place when the regulations were introduced. Procedures for testing had been developed and were successfully phased in to avoid a sudden drop-off in pass rates. In addition to testing, the training arrangements were suitable with a large number of centres and courses approved right from the initial introduction of the regulations.

Procedures for enforcement were in place and were used, with enforcement picking up year by year following the introduction of the regulations. The one element of implementation where there was perhaps less evidence of success is awareness which was raised as a concern in the 2012 interim evaluation. Despite this, compliance appears to be very high.

## **5. Outcome Evidence**

This section provides evidence on the outputs and outcomes potentially related to the CPC. It aims to give readers an indication of whether outputs and outcomes have changed in the ways expected and whether it can be reasonably concluded that the CPC played a role.

### **5.1. How have the regulations affected driver training and skills?**

The logic model for the Driver CPC (see Figure 2) suggested that the requirement to take and pass the CPC as well as the requirement for a minimum of 35 hours of periodic training over five years would lead to more rigorous and continuous driver training. This in turn was expected to lead to increased driver skill levels.

Since the regulations came into force an increasing number of drivers have received the DQC indicating that they have reached the required professional standards. Issuance of DQCs has increased through the initial qualification route and following the completion of periodic training.

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<sup>18</sup> 91 employers responded to this survey.

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**Figure 9: DQCs Issued through Initial Qualification and Periodic Training Routes**

<b>Financial Year</b>	<b>DQCs: Initial Qualification</b>	<b>DQCs: Periodic Training</b>
2008/09	3,948	655
2009/10	7,524	3,790
2010/11	12,104	10,215
2011/12	14,003	29,219
2012/13	16,511	106,886
2013/14	21,054	254,191
2014/15	30,025	328,329
2015/16 (up to January 2016)	29,799	37,478

Source: DVSA

The volume of training hours logged has also increased over this period as shown in Figure 10. The last full year of training data saw around 8.5 million hours logged, this equates to roughly 9.7 hours for each of the 875,000 DQC holders. The total number of periodic training hours logged since 2008, for all lorry, bus and coach drivers combined, is 3,249,761 as of end of February 2016.

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**Figure 10: Periodic Training Hours Logged**

<b>Financial Year</b>	<b>Training Hours Logged</b>
2008/09	430,714
2009/10	1,465,725
2010/11	2,830,834
2011/12	3,805,109
2012/13	5,013,001
2013/14	7,008,077
2014/15	8,477,843
2015/16 (up to January 2016)	2,846,338

Source: DVSA

The latest employment data from the ONS (see Figure 14) suggest there are around 299,000 and 122,000 people who classify themselves as large goods vehicle drivers and drivers of buses or coaches in employment in the UK, respectively. There are also around 205,000 people who classify themselves as van drivers in employment<sup>19</sup>.

This seems to suggest that the total number of people employed in occupations that could be affected by CPC regulations (i.e. including all van drivers even though many will be unaffected) is still only 626,000 which is substantially below the 875,712 DQCs issued to drivers in the past five years<sup>20</sup>. This difference may be as a result of DQC holders working in other, unaffected, occupations or being unemployed.

Considering the estimated number of drivers and the amount of periodic training they are undertaking, it appears that they are undertaking more training than is required. For example, using the 421,000 drivers would amount to 14.7m hours over five years, which

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<sup>19</sup> For the purposes of the ONS data, van drivers are those who “collect, transport and deliver goods in vehicles up to 7.5 tonnes in weight”. Within this group of people, those driving vehicles below 3.5 tonnes will not be affected by the CPC regulations and can drive vehicles up to 3.5 tonnes on a category B (car) licence. Those driving vehicles above 3.5 tonnes will need a category C1 licence and will be affected by the CPC regulations.

<sup>20</sup> This figure excludes replacement DQCs

would equate to 2.9m hours per year if evenly spread across the training period. If we take the 626,000 figure then the estimated annual requirement would be 4.4m hours which is still below the latest full year total (8.5m hours in 2014/15) and below the estimated annual requirement for the 875,712 DQC holders which would amount to 6.1m hours.

One interpretation of observing annual training hours that surpass these estimates of the potential total annual requirement is that drivers do not evenly spread out their required training, despite being encouraged to do so. This may be because they decide to concentrate their training periods to achieve cost savings. It will also be the case that some individuals who are unemployed or employed in unaffected occupations register training hours meaning that the total hours recorded are greater than the number that would be observed if only those employed in affected occupations undertook training.

Regardless of the underlying explanation, the training data gives some confidence that professional drivers are undertaking continuous professional development which is likely to contribute to their skill levels.

Although pass rates do not give much indication of the skill levels of drivers on the roads, they may have some relevance to the issue of skills by indicating levels of preparedness of drivers taking the tests. As Figure 11 and Figure 12 show, there have been some reductions in the pass rates of theory tests while practical test pass rates have increased.

**Figure 11: Category C Tests**

	Theory Test						Practical test	
	Combined Hazard Perception and Multiple Choice		Hazard Perception		Multiple Choice		Tests Conducted	Pass Rate
Financial Year	Tests Conducted	Pass Rate	Tests Conducted	Pass Rate	Tests Conducted	Pass Rate		
2007/08	41,486	72.7					70,766	46.3
2008/09			20,581	82.0	20,725	79.0	65,852	49.0
2009/10			25,667	81.5	25,777	79.8	46,426	51.4
2010/11			26,476	81.9	26,607	79.8	43,894	51.6
2011/12			27,115	81.4	27,451	78.9	46,549	52.4
2012/13			26,688	81.1	27,249	77.4	46,246	53.0
2013/14			29,769	80.0	33,086	67.5	48,283	54.3
2014/15			36,552	79.3	41,328	66.3	55,161	55.4

Source: DVSA

**Figure 12: Category D Tests**

Financial Year	Theory Test						Practical test	
	Combined Hazard Perception and Multiple Choice		Hazard Perception		Multiple Choice		Tests Conducted	Pass Rate
	Tests Conducted	Pass Rate	Tests Conducted	Pass Rate	Tests Conducted	Pass Rate		
2007/08	9,141	69.7					10,331	50.4
2008/09			4,697	81.0	4,656	77.7	10,306	51.9
2009/10			7,497	81.1	7,588	78.9	9,258	52.6
2010/11			7,291	80.8	7,422	76.7	8,546	53.8
2011/12			7,276	79.7	7,276	77.7	8,456	53.7
2012/13			7,040	80.5	7,196	76.5	9,162	52.9
2013/14			7,731	79.1	8,325	68.7	9,026	55.1
2014/15			7,757	77.9	8,580	66.6	8,231	55.7

Source: DVSA

The available evidence is therefore supportive of the idea that drivers are undertaking training to boost their skills. Unfortunately there is no reliable information on training uptake prior to the introduction of the CPC, although clearly some training must have taken place. The only information that appears to be available on the topic is an estimate by the European Commission that in most Member States only 5-10% of professional lorry and bus drivers undertake any training beyond what is needed to pass the relevant driving test<sup>21</sup>.

Although we cannot be confident the Regulations have increased pre-test training and therefore increased skill levels, it seems reasonable to conclude that the high number of periodic training hours logged is likely to have contributed to driver skills. Anecdotal feedback from the industry supports this idea. Transport for London (TfL), for example, introduced a requirement for all their professional drivers, including subcontractors, to undertake periodic training aimed at improving road safety. Both drivers and managers were pleased with the results with 70% of managers reporting that staff were better equipped for their roles and 85% of drivers suggesting the course had made them a safer driver; similar positive feedback was also recorded, in the same survey, for the CPC Safe Urban Driving Course<sup>22</sup>.

This anecdotal feedback does provide some reassurance that all the training hours logged may be contributing to improved skills but the absence of reliable evidence means it is not possible to confidently state whether the regulations have increased training or boosted skill levels.

## **5.2. How have the regulations affected the drivers and the driver labour market?**

The logic model for the Driver CPC (see Figure 2) suggested that the regulations could potentially have a number of labour market impacts. Increased skill levels were expected to lead to higher wages while the training requirements were expected to improve perceptions

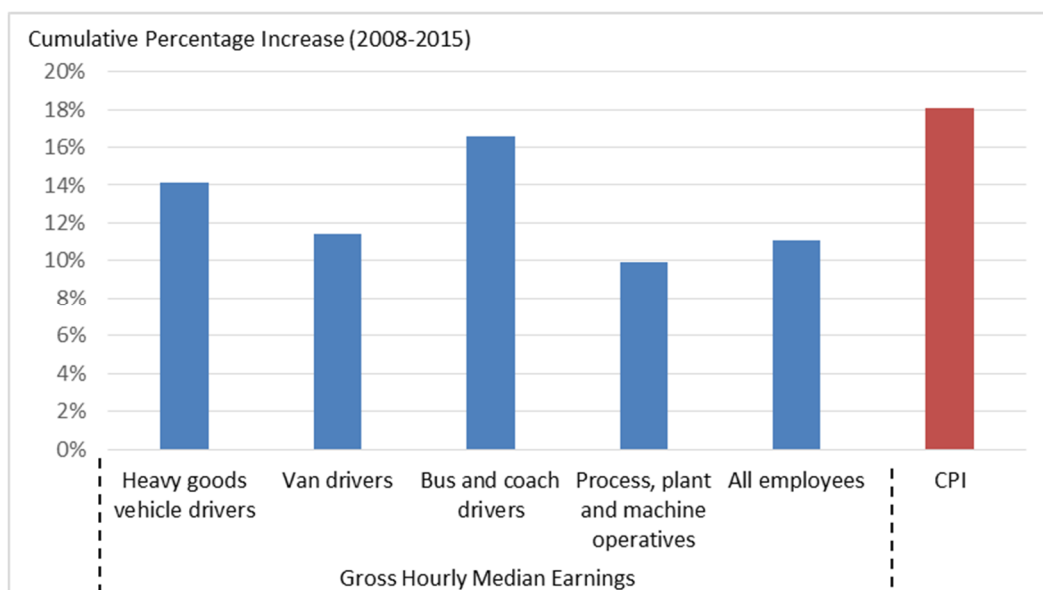
<sup>21</sup> As cited in the explanatory memorandum for the CPC regulations and in the Panteia report

<sup>22</sup> 'Freight DCPC Training Effectiveness'

of the industry and in doing so encourage new entrants to the industry including younger people.

Since the introduction of the CPC, gross hourly earnings of large goods vehicle drivers and drivers of buses and coaches have increased by more than wages in the wider occupational category<sup>23</sup> (see Figure 13). Despite this, over the same period, consumer prices have increased by around 18% suggesting that in real terms, wages in these occupations have been flat at best.

**Figure 13:** Earnings Growth Since 2008



Source: ONS Annual Survey of Hours and Earnings

The total number in employment as large good vehicle drivers has decreased since the introduction of the CPC while the numbers of van, and bus and coach drivers in employment has increased.

**Figure 14:** Employment – Occupations Affected by CPC

Total number in employment	2008	2015	Percentage Change
Large goods vehicle drivers	320,304	299,217	-6.6%
Bus and coach drivers	106,089	121,929	14.9%
Van drivers	200,636	204,896	2.1%

The test data shown in Figure 11 and Figure 12 are also relevant and display decreasing numbers of practical tests being performed for both category C and D following the introduction of the CPC but this may, in part at least, be reflective of the fact that practical test pass rates have increased.

DVSA have received anecdotal suggestions that fewer existing licence holders are taking vocational tests to upgrade their licence, possibly because they would have to commit to

<sup>23</sup> Process, plant and machine operatives

fulfilling their periodic training requirement, which would not have been the case prior to the introduction of the CPC.

The trends described above may have contributed to changes in the age distributions of those in the occupations affected by the CPC. For large goods vehicle drivers there appears to have been a shift towards those aged 50 or more since the introduction of the CPC while the pattern is less stark for the other two occupations (but still features increasing proportions of those in employment being 50 or above).

**Figure 15: Age Distribution – Occupations Affected by CPC**

	Age				
	20-29	30-39	40-49	50-59	60+
<i>8211 Large goods vehicle drivers</i>					
Oct-Dec 2008	8.5%	21.8%	33.8%	23.1%	12.7%
Oct-Dec 2014	6.3%	15.0%	31.7%	32.2%	14.8%
Change (percentage points)	-2.2	-6.8	-2.2	9.1	2.1
<i>8212 Van drivers</i>					
Oct-Dec 2008	12.4%	21.5%	25.0%	24.5%	15.8%
Oct-Dec 2014	13.1%	18.8%	26.4%	24.5%	17.2%
Change (percentage points)	0.7	-2.7	1.4	0.0	1.4
<i>8213 Bus and coach drivers</i>					
Oct-Dec 2008	-	17.2%	29.1%	23.2%	22.3%
Oct-Dec 2014	8.8%	14.6%	28.6%	33.2%	14.8%
Change (percentage points)		-2.6	-0.4	10.0	-7.5

Source: ONS Labour Force Survey

At the same time, the number of drivers, aged 18-21, obtaining a vocational licence has shown a decline since Driver CPC was introduced. However, this may in part be due to wider changes in population make up.

**Figure 16: Vocational licence applications by young drivers 18-21**

Year (calendar)	Age 18	Age 19	Age 20	Age 21
2009	4,306	4,342	4,443	7,390
2010	3,753	4,047	4,633	5,981
2011	3,610	4,010	4,570	5,631
2012	3,648	3,704	4,298	5,442
2013	3,362	3,447	3,881	5,082
2014	2,087	2,295	2,830	3,430

Source: DVLA

Perception among some of the relevant stakeholders is that there are shortages in some of these occupations and that the introduction of the CPC is a potential contributor to this. For example, the Freight Transport Association (FTA) Logistics Report 2015 reports that:



“Two-thirds of transport managers now anticipate a shortage of LGV drivers, most blame the shortfall on the retirement of drivers opting not to complete the Driver CPC.”<sup>24</sup>

Further relevant evidence on this topic comes from a recent survey by the Road Transport Industry Training Board (RTITB)<sup>25</sup> that suggested the CPC regulations may affect the likelihood of drivers remaining in the industry. Unfortunately it is difficult to interpret the survey results as the question is vaguely worded<sup>26</sup> but if respondents reporting “yes” feel they are more likely to leave the industry due to CPC this would support the point in the FTA report.

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**Figure 17: RTITB Survey on Effects of the CPC on Driver Retention: Responses to Question ““Does completing Driver CPC/periodic training affect the likelihood of you remaining in the industry?””**

Survey responses	Number	Percentage
Yes	194	24%
To some extent	223	27%
No	395	49%
Total	812	100%

*Source: RTITB*

Overall, it is difficult to ascertain the impact of the CPC on the driver labour market but the data presented do highlight some relevant developments. They show that driver wages have grown at a faster rate than wages in the broader occupational class but have declined in real terms having not kept pace with inflation.

Numbers in employment as large goods vehicle drivers have fallen while there have been slight increases for van drivers and coach and bus drivers. For all three occupations the proportion of those employed that are aged 50 and over has increased, whilst the number of younger drivers entering the profession is decreasing, and there is a perception among some stakeholders that shortages exist, particularly for large goods vehicle drivers.

Taken together, this evidence provides little support for the idea that the CPC would encourage new entrants to the industry by boosting wages and improving perceptions of the industry. It is important to note, however, that there are many other factors affecting the driver labour market, for example working conditions, so these data also do not rule out the idea that the CPC could have beneficial consequences for the driver labour market.

### **5.3. How have the regulations affected road safety?**

The logic model for the Driver CPC (see Figure 2) suggested that the regulations could potentially improve road safety by increasing the skill levels of professional drivers, including those from other EU states that drive in the UK.

The latest accident statistics do show that accidents have fallen since the introduction of the CPC for the vehicle types affected. It is the case, however, that accident rates have

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<sup>24</sup> [http://www.fta.co.uk/export/sites/fta/\\_galleries/downloads/logistics\\_report/Web\\_files/LR15\\_WEB\\_270415.pdf](http://www.fta.co.uk/export/sites/fta/_galleries/downloads/logistics_report/Web_files/LR15_WEB_270415.pdf) p.11

<sup>25</sup> Conducted March 2016.

<sup>26</sup> If CPC made one respondent more likely to stay in the industry (as they appreciate the continuous training) and another less likely (as they find the required training burdensome) they would both answer ‘yes’ on this question.

decreased for cars also. As with many of the other potential effects of the CPC, it is very difficult to assess the extent to which the CPC alone has contributed to observed outcomes given there are numerous other factors that have an influence.

**Figure 18:** Road Accident Rates in Great Britain

Year	Accidents per billion vehicle miles			
	Cars	Buses or coaches	Vans / Light goods vehicles	Heavy goods vehicles
2004	1191	3304	420	688
2005	1155	3163	419	674
2006	1085	2782	390	628
2007	1035	2551	349	588
2008	965	2669	328	509
2009	928	2512	325	459
2010	887	2381	313	465
2011	851	2494	311	447
2012	822	2321	305	433
2013	774	2105	298	416
2014	800	2179	312	430

*Source: DfT Road accidents and safety statistics*

#### 5.4. How have the regulations affected businesses?

The logic model for the Driver CPC (see Figure 2) suggested that the regulations could potentially affect businesses in a number of ways. The potential for wage increases as a result of improved skills could increase wage bills but firms could potentially yield savings in insurance premia (given improved driver skills) and fuel costs (if improved driving skills lead to more efficient driving). Firms could also be affected if the CPC improves perception of the industry, attracting new workers to enter.

The evidence presented in sections 5.1 and 5.2 suggests that it is not possible to establish the impact of the CPC on wages or skills. This means that it is also difficult to establish the impact of the CPC on businesses, though there is some evidence on perceived impacts from industry reports and the 2012 Interim Evaluation.

The perceived impacts do have some overlap with those expected as both fuel efficiency improvements and reductions in accidents were mentioned as potential benefits by stakeholders interviewed for the 2012 report. As reported in section 5.2, there was some concern that some older drivers had retired or left the industry rather than completing their periodic training requirements. The 2012 report also mentioned the prospect that firms would pay to train staff that subsequently left the company as a potential adverse impact.

Despite these concerns, around 60% of the 111 operators surveyed (including both LGV and PCV operators) for the 2012 report had positive views of the CPC. Negative views were reported by 15% of PCV operators and 26% of LGV operators (with the remaining 25% and 14%, respectively, reporting neutral views).

The sectors affected by the CPC primarily consist of small firms (see Figure 19) and consequently this was an issue considered in the 2012 evaluation. The main differences highlighted were that smaller firms were more likely to use external providers to deliver their

training and may be more likely to face capacity issues when their drivers are off the road attending training.

**Figure 19: PCV and LGV Industry Structure**

Employment size bands	Freight transport by road		Urban and suburban passenger land transport	
	Number of Enterprises	Proportion	Number of Enterprises	Proportion
0-4	33,295	84.3%	965	56.1%
5-9	2,885	7.3%	275	16.0%
10-19	1,740	4.4%	210	12.2%
20-49	1,015	2.6%	145	8.4%
50-99	345	0.9%	45	2.6%
100-249	140	0.4%	25	1.5%
250+	65	0.2%	55	3.2%
Total	39,485	100%	1,720	100%

Source: ONS - Inter Departmental Business Register (2015)

Overall, there is limited evidence on how businesses have been affected by the CPC but businesses' perceptions of the regulations are more positive than negative. For example, Jack Semple, Directors of Policy at the Road Haulage Association (RHA), has said the following of Driver CPC:

*"It now has widespread - although far from unanimous - acceptance among RHA members as being beneficial to their businesses and to standards in the haulage industry. The RHA's public position is that customers should look for a policy of regular DCPC training as evidence of a good quality haulier. In many fleets, it is cemented as a beneficial part of the way the company is run."*

Source: Jack Semple direct quote to DfT (2016)

### **5.5. How have the regulations affected competition in the industry across the EU?**

The logic model for the Driver CPC (see Figure 2 **Error! Reference source not found.**) suggested that the regulations could potentially increase competition across the EU by creating consistent standards in all member states.

Cabotage (road haulage solely within one country by a vehicle registered in another country) in the UK has remained relatively flat since the introduction of CPC (see Figure 20) but this does not rule out the idea of the CPC having an effect on competition within the EU as there are many other factors affecting cabotage penetration rates.

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**Figure 20: UK Cabotage Penetration Rate<sup>27</sup>**

<b>Year</b>	<b>Penetration rate (% of million tonne kilometres)</b>
2004	1.2
2005	1.2
2006	1.1
2007	0.9
2008	1.1
2009	0.9
2010	0.9
2011	0.7
2012	0.7
2013	0.7
2014	1.0

*Source: DfT Road Freight Statistics<sup>28</sup>*

The 2013 DSA public consultation on the CPC reported that some stakeholders were concerned that other Member States had not enforced the CPC to the same extent as the UK, something that could undermine the extent to which it creates a level playing field. Some respondents felt the UK was the only Member State actually enforcing the Directive and conducting periodic training. This has led some to question if foreign nationals are returning to their country of origin to 'buy' a DQC and then return to work in the UK, creating ill-feeling from UK companies. The UK Government refutes this argument; the CPC applies Europe-wide and it is the responsibility of the Commission to police the implementation across Member States.

There were also some potential competition issues put forward in the 2012 Interim Evaluation that reported some stakeholder were concerned that the UK had not given acquired rights holders as long to complete their periodic training as other countries.

The UK opted to give drivers with acquired rights a five-year period to complete their periodic training as the existing renewal triggers (age 45 when a driver has to renew their medical to prove their fitness to continue driving professionally, and ten years after a photocard driving licence has been issued, when a replacement must be requested) did not fit with the Directive's requirements of coinciding the acquired rights period with that of the expiry of the driving licence. The Directive stipulated that this period must be no shorter than three and no longer than seven years. As outlined in Figure 5, there were a variety of approaches taken by Member States including some that only gave acquired rights holders three years to complete their periodic training, such as Cyprus and France.

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<sup>27</sup> The cabotage penetration rate is defined as cabotage (in tonne kilometres) as a proportion of the sum of domestic and cabotage tonne kilometre

<sup>28</sup> Note: there are methodological changes between 2011 and 2012 which affect comparability.

Overall, despite these concerns, there is unfortunately no clear evidence that the regulations have affected competition either favourably or adversely.

### **5.6. Have the regulations had any unintended consequences?**

Whilst the Directive is clearly aimed at professional drivers, some of the wording in the Articles seems to capture occasional and incidental drivers as well. This is leading many Member States, including the UK, to seek clarification from the Commission and is one of the reasons why the Commission is currently reviewing the Directive.

For example, farm workers driving agricultural vehicles as part of their work are not professional drivers, however, if they then, as an incidental part of that work, drive a vehicle to transport goods to market, they would be caught by CPC. This is because they are then driving goods commercially.

School teachers are another group that are caught in a similar way as there remains ambiguity over the definition of non-commercial carriage of passengers; Article 2f of the Directive states that the Directive does not apply to drivers of vehicles used for non-commercial carriage of passengers or goods for personal use – a schoolteacher may be volunteering in their own time to transport children to a sports venue after school hours, for example.

The evidence above has also pointed toward some further unintended consequences including the perception among some stakeholders that the CPC had contributed toward older drivers leaving the industry when faced with a requirement to complete periodic training. There is also the issue that the requirement to take continual training may have contributed to the reduction in the number of existing licence holders taking vocational tests to upgrade their licence, as previously mentioned in section 5.2 above.

### **5.7. Summary**

These sections have reported evidence on outputs and outcomes potentially related to the CPC. The lack of baseline data on some of the key outcomes coupled with the fact many of the outcomes are affected by numerous other factors has made firm conclusions hard to draw. It is, however, fair to say:

- There is clear evidence that drivers are undertaking continuous professional training that should contribute to their skill levels;
- There is some indication that earnings in the affected occupations have outperformed the broader occupational class since the introduction of the CPC but this does not appear to have been accompanied by increased inflows to the occupations;
- Safety outcomes have improved, but improvement has been seen across the board and safety trends were positive well before the introduction of the CPC;
- On balance, firms' views of the CPC are more positive than negative but there is limited evidence on precisely how they have been affected, something that is also true of competition across the EU; and

- There may have been some unintended consequences from the periodic training requirement which may have dissuaded existing licence holders and drivers near to retirement with expired acquired rights from obtaining a DQC.

## 6. Economic Evidence

This section provides estimates of the actual costs<sup>29</sup> imposed by the CPC regulations. It aims to compare these actual costs to the potential benefits of the regulations in order to identify the level of benefits that would be required to offset the estimated costs.

The initial impact assessment for the Directive carried out some cost benefit analysis but did not use a modern impact assessment template (as the analysis was performed in 2007). This means there is no net present value (NPV) estimate and that the analysis is not of standards that would be expected today.

This analysis did, however, quantify the following costs:

- Financial and opportunity costs for drivers undertaking additional tests
- Financial and opportunity costs for drivers undertaking additional training.

The analysis also covered the following benefits:

- Safety benefits – these were quantified based on speculative assumptions
- Fuel savings – these were mentioned qualitatively.

The economic evaluation for this PIR provides estimates of the annual costs of the regulations based on the outturn data. Given the lack of evidence on the scale of any potential benefits from the regulations, a break-even analysis has been performed to assess the estimated level of benefits that would need to occur to offset the estimated costs.

### 6.1. Costs

The economic evaluation separates costs into two categories: costs of changes to category C or D licence acquisition (initial CPC qualification), and costs as a result of the periodic training element.

#### 6.1.1. Initial Qualification

The initial CPC qualification requires drivers to take two additional test modules (over and beyond the pre-existing licence acquisition test) in order to drive professionally. The associated costs are:

- The cost of taking additional tests. This is based on total test fee income to DVSA from additional modules, and therefore takes account of repeat tests.
- The cost of drivers waiting to take additional tests when they would otherwise be productively employed. This cost is made up of lost wages, and lost value to the business. PCV drivers are typically employed prior to license acquisition, so we assume that they are able to take other training or do some productive work during

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<sup>29</sup> All figures presented in this section are in 2015 prices.

the delay (before achieving full CPC). We assume that during this period their time is half as productive as it would be after license acquisition. LGV drivers are not typically employed before gaining the necessary license, so their delay is treated as entirely unproductive. This figure is sensitive to these assumptions, and to changes in waiting times.

- The cost of additional training to prepare for the tests, based on the estimated cost of training and the number of people who gained the initial qualification. DVSA estimate that 80% of CPC test content duplicated pre-existing tests. The cost of training for the last 20% of content that was added by the Directive is included in the estimate. We assume that the average cost of training for full CPC for LGV and PCV drivers is £1000, of which £200 relates to the additional content. This is a conservative estimate that assumes bus drivers, whose training is generally paid for by the company, also receive training on topics that are not tested as part of CPC (such as items that are specific to that bus company), and that some LGV drivers will prepare for the test independently without paying for expensive training courses.

The original impact assessment included the cost of issuing driver qualification cards. This cost is assumed to be covered by the additional test fees received by DVSA.

**Figure 21:** Initial Training summary table

	<b>2011/12</b>	<b>2012/13</b>	<b>2013/14</b>	<b>2014/15</b>	<b>Total since implementation<sup>30</sup></b>
Increase in test fees	£2.7m	£3.2m	£4.1m	£5.8m	£20m
Cost of delay (PCV drivers)	£1.6m	£1.9m	£2.3m	£2.9m	£11m
Cost of delay (LGV drivers)	£12.0m	£14.2m	£18.2m	£27.0m	£91m
Increase in training	£2.8m	£3.3m	£4.2m	£6.0m	£21m
<b>Initial qualification total cost</b>	<b>£19m</b>	<b>£23m</b>	<b>£29m</b>	<b>£42m</b>	<b>£144m</b>

#### 6.1.2. Periodic Training

The Directive also has a periodic training requirement for each driver to record 35 hours of approved training every 5 years. The associated costs in the economic evaluation are:

- The opportunity cost of having to spend time training instead of working (when firms are not able to use their workers' time productively). This cost is based on the resource cost to firms of employing an LGV or PCV driver and the number of periodic training hours logged with DVSA. We assume that 7.5% of firms were already completing their own version of periodic training equivalent to the CPC requirement prior to its introduction, and so the cost we include is based only on the increase in training.
- The cost of paying for approved periodic training. This is based on the assumed cost of training and the number of additional hours logged with DVSA.

The original impact assessment included the cost of having training courses approved, the cost of having training centres approved, and the cost of recording periodic training. For the economic evaluation, these costs are assumed to be passed on by training providers to drivers and businesses. Therefore, these costs are covered in the cost of paying for approved periodic training.

<sup>30</sup> Total cost since implementation in 2008/09.

The approach taken to quantify the total cost of periodic training uses many of the same cost inputs that were estimated in the original impact assessment, since more recent data was not available. For instance, the cost of one day of training was taken from estimates made before the Directive was implemented. While we know that most of these costs have changed little, some of our inputs are more robust than others.

To indicate how sensitive our estimate of the overall cost of the Directive is to changes in less robust inputs, we have looked at what difference changes in these numbers would make to the overall picture. This is called a sensitivity test.

A first sensitivity test is around the cost of one day's periodic training. Our central estimate follows the impact assessment and assumes that the cost is £150. We have also included figures to show the impact of increasing the cost to £200, for a high estimate, and to £100, for a low estimate.

To respond to inconsistent driver categories in different data sources, we have estimated the total number of employed LGV drivers affected by the Directive using vehicle registration statistics. These differentiate between vehicles under 3.5 tonnes (which can be driven with a category B car licence and are therefore out of scope of CPC) and LGVs between 3.5 and 7.5 tonnes (which require full CPC). The employment data does not distinguish between any LGV under 7.5 tonnes, so the registration statistics have been applied to estimate the number of employed LGV drivers who are in-scope for CPC.

Our analysis indicates that the number of training hours logged since CPC was introduced is 36% higher than would be required for all employed drivers of buses and coaches and LGVs over 3.5 tonnes to meet their periodic training threshold. This may be due to drivers between jobs taking training to keep up their skills and refresh their qualification, CPC holders recording more training than required or those employed in unaffected occupations registering training hours; it could also, in part, be due to non-UK nationals undertaking training in the UK and then moving outside the UK to work.

We have also followed an alternative "bottom-up" method to show what the cost of the Directive would be if training was only undertaken by employed in-scope<sup>31</sup> drivers, completing seven hours training each per year (35 hours over 5 years). In this scenario the costs are more even over time, since this method does not take account of individuals delaying, and completing all of their required training in one go.

The results of this analysis can be seen in the following summary table.

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<sup>31</sup> In-scope drivers here is based on the ONS Labour Force Survey data: it includes all LGV drivers of vehicles >7.5 tonnes, all bus and coach drivers, and the percentage of those who are classified as "van" drivers who are estimated to actually be within scope of CPC.



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**Figure 22:** Periodic Training summary table

	<b>2011/12</b>	<b>2012/13</b>	<b>2013/14</b>	<b>2014/15</b>	<b>Total since implementation</b>
Opportunity cost of time spent not working (PCV drivers)	£12.5m	£16.6m	£23.5m	£29.0m	£97m
Opportunity cost of time spent not working (LGV drivers)	£29.3m	£38.8m	£55.0m	£68.0m	£227m
Cost of training (all drivers) (central case)	£75.4m	£99.4m	£138.9m	£168.0m	£575m
<b>Total increase in cost due to periodic training</b>	<b>£117m</b>	<b>£155m</b>	<b>£217m</b>	<b>£265m</b>	<b>£900m</b>
<b>Total costs for sensitivity test scenarios</b>					
<b>High training costs</b>					
Total increase in cost due to periodic training	£142m	£188m	£264m	£321m	£1091m
<b>Low training costs</b>					
Total increase in cost due to periodic training	£92m	£122m	£171m	£209m	£708m
<b>Bottom-up estimate</b>					
Total increase in cost due to periodic training	£94m	£94m	£94m	£95m	£660m

### 6.1.3. Total cost of the Directive

The table below shows the estimated total cost of the Directive – the sum of initial training costs and periodic training costs.

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**Figure 23:** Driver CPC summary table

	<b>2011/12</b>	<b>2012/13</b>	<b>2013/14</b>	<b>2014/15</b>	<b>Total since implementation</b>
Central Case Total cost	£136m	£177m	£246m	£307m	£1044m
High training costs Total cost	£161m	£210m	£293m	£363m	£1236m
Low training costs Total cost	£111m	£144m	£200m	£251m	£852m
Bottom-up estimate Total cost	£113m	£116m	£123m	£136m	£804m

The economic evaluation also calculates the average annual cost of the regulations under the different scenarios since implementation. This reduces the distortion of uneven training by year in the central case and training cost sensitivity tests.

**Figure 24:** Estimated average annual cost of Driver CPC regulations<sup>32</sup>

	<b>2008/09-2014/15 annual average</b>
Central case	£149m
High training cost	£177m
Low training cost	£122m
"Bottom-up" estimate	£115m

The initial impact assessment estimated the annual cost of the Directive as implemented (including only the initial qualification and periodic training components) at £209m. This is £60m higher than our central case. The main drivers of the difference are:

- The estimates in the original impact assessment implicitly assumed that no drivers were already undertaking periodic training on a voluntary basis. This PIR acknowledges that some drivers were already undertaking training before the regulations were introduced, something that reduces the estimated cost the PIR arrives at.
- The estimates in the original impact assessment included the cost of issuing driver qualification cards. In this PIR, the cost of issuing driver qualification cards is assumed to be covered by the additional test fees received by DVSA.

## **6.2. Benefits**

The impact assessment looked at two possible sources of benefit that could be quantified and set against the costs of the Directive - safety benefits and fuel savings. As explained in section 5.3, it is difficult to establish a counterfactual and know how many accidents would have taken place without the Directive. Therefore, it is not possible to know what the exact safety impact of the Directive has been. Similarly, there are many factors other than the Directive that would affect fuel consumption.

The economic evaluation conducts a simple break-even analysis<sup>33</sup> to show what safety benefits or fuel savings would have offset the costs of the Directive as listed above. Since the table below is only intended to be indicative, our safety calculations<sup>34</sup> are based on all casualties (fatalities, serious injuries, and slight injuries) involving at least one category C or D vehicle. Fuel savings are based on the 12.1bn litres of annual consumption used in the impact assessment, updated with annual recorded fuel prices.

<sup>32</sup> The average annual cost figures are equal to the total costs since implementation divided by the number of years since implementation (i.e. 7 years from 08/09 to 14/15)

<sup>33</sup> Break-even analysis involves calculating the scale of benefits that would be required to exactly offset the estimated costs. The figures provided are not predictions of the actual benefits.

<sup>34</sup> Based on all casualties involving at least one category C or D vehicle from DfT road safety statistics, and the appraisal values of safety benefits in the WebTAG Databook.

**Figure 25: Break-Even Analysis**

	<b>2011/1 2</b>	<b>2012/13</b>	<b>2013/14</b>	<b>2014/1 5</b>	<b>Total since implementation</b>
<b>Central case</b>					
Casualty reduction needed for welfare break-even	6.7%	8.9%	13.2%	15.9%	7.3%
Percentage reduction in fuel consumption needed for welfare break-even	0.9%	1.1%	1.6%	2.0%	1.0%
<b>Bottom-up estimate</b>					
Casualty reduction needed for welfare break-even ("bottom-up" estimate)	5.6%	6.0%	7.0%	7.6%	5.7%
Percentage reduction in fuel consumption needed for welfare break-even ("bottom-up" estimate)	0.7%	0.7%	0.8%	1.0%	0.8%

Therefore, a 7% increase in road safety would be required to offset the costs of introducing CPC, or a 1% reduction in fuel consumption. As explained above, and in section 5.3, it is not possible to say if this was achieved since we cannot say what level of accidents or fuel consumption would have been without the Directive. It is left to the reader to consider whether this scale of benefits could plausibly be caused by the changes implemented in the Directive.

## **7. PIR Recommendation**

This section sets out and explains the recommendations resulting from the PIR. It aims to explain the next steps for the regulation and outline any lessons for future impact assessments.

### **7.1. Have the regulations met their objectives and do these objectives remain valid?**

The objectives of the Directive were:

- to improve road safety and driver safety;
- to improve the professionalism and the quality of service offered by professional drivers; and
- to contribute towards lessening driver shortages by encouraging more younger drivers into the sector.

Section 5.3 reported that although safety outcomes had improved this improvement had occurred for a number of modes unaffected by the regulations. This coupled with the fact safety outcomes are affected by many other factors means that it is not possible to say whether the regulations have improved road safety.

Figure 18 showed that in the latest year there were 2,179 and 430 accidents per billion miles travelled by buses or coaches and heavy goods vehicle respectively. This means the objective of improving road and driver safety is clearly still valid.

The second two objectives were discussed in sections 5.1, covering driver skills, and 5.2, covering the driver labour market. It was concluded that the absence of reliable evidence means it is not possible to confidently state whether the regulations have increased training or boosted skill levels while evidence also provides little support for the idea that the CPC would encourage new entrants to the industry by boosting wages and improving perceptions of the industry. For both of these objectives, as with safety, there are many other factors that play a role so identifying the impact of the CPC was always likely to be difficult.

Figure 15 shows that the age structure in the industry includes many workers who may be near to retirement and this gives support to the continuing validity of the objective to encourage young drivers into the sector. The objective of improving professional skills and service levels also remains valid given the strategic importance of these sectors and the safety outcomes mentioned above.

## **7.2. What is the recommended course of action for the regulations?**

We believe that Government intervention is still required given the objectives of the regulation remain valid. It is also the case that the UK would be at a disadvantage if the regulations were to be removed, as UK drivers driving professionally in other EU states would still be required to show that they had undergone CPC to access these markets. Removing the Regulations also risks going back on all of the work that has already been achieved to provide ongoing continuous professional development for vocational drivers, levelling the skills playing field across the EU.

The recommendation therefore is that the regulations remain.

## **7.3. What will the next steps relating to the regulation be?**

Whilst the UK remains a full member of the EU, we will continue to work with the European Commission on the review of the Directive and will do so in the best interests of the UK. The UK's priorities for reforming the regulation include issues such as interpretations of exemptions across different Member States which are being addressed in working groups which the UK currently contributes to<sup>35</sup>.

The regulations will be kept under review as required and stakeholder views will continue to be sought through regular engagement channels.

Since publication of the final report (October 2014, the ex-post evaluation "Study on the effectiveness and improvement of the EU legislative framework on training of professional drivers"), the Commission has been developing an economic impact assessment to support proposed changes that have been informed by the previous stakeholder events and consultations. These must be submitted to all Member States to consider and agree before the changes become a reality. The changes would first be presented to the European Driver

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<sup>35</sup> On 23 June 2016, the EU referendum took place and the people of the United Kingdom voted to leave the European Union. Until exit negotiations are concluded, the UK remains a full member of the European Union and all the rights and obligations of EU membership remain in force. During this period the Government will continue to negotiate, implement and apply EU legislation. The outcome of these negotiations will determine what arrangements apply in relation to EU legislation in future once the UK has left the EU.

CPC legislative group. The UK Government is represented at the Driver CPC legislative working group.

Once the impact assessment and proposals for change have been presented to the legislative group the UK Government will present them to stakeholders to inform a negotiating stance. As yet we have not been informed of the date of publication of this and we are not expecting one prior to this PIR being published.

#### **7.4. Are there any lessons for impact assessments from this PIR?**

This PIR has reported evidence on outputs and outcomes potentially related to the CPC. The lack of baseline data on some of the key outcomes coupled with the fact that many of the outcomes are affected by numerous other factors has made firm conclusions hard to draw. Future impact assessments should set out a clear plan for monitoring and evaluating the regulations in question, prioritising the collection of baseline data on key costs and benefits of the regulations.

## **8. Annex A: Full Set of Original Research Questions**

- How effectively has the EU Directive been implemented?
- Did the implementation of the UK regulation avoid gold plating?
- Has there been high awareness of the regulation?
- How effective is the implementation of a modular approach for implementing testing?
- Is the test-based approach the most effective way of implementing the EU Directive?
- How effective are the arrangements for Periodic Training?
- What are the compliance rates of trainers?
- How many training companies have had approvals withdrawn?
- Could improvements be made to DVSA's approach to the approval of training courses? (e.g. timing, replication of tests, minimisation of costs).
- How many drivers have undertaken training?
- How many licenses have been issued?
- How do the pass rates of CPC compare to European countries?
- Is the regulation consistent with EU standards?
- Could the EU Directive be transposed more effectively (e.g. the exemptions)?
- How has the Directive been implemented in other Member States?
- How many 18-21 year olds and NVTs are taking tests?
- Have the regulations resulted in more effective and continuous training?
- How many fines have been issued for non-compliers?
- What have been the outcomes of the regulation?
- What impact has the regulation had on the activity of the traffic commissioner?
- Has the regulation improved driving skills?
- What are the compliance rates of drivers?
- What impact has the training had upon fuel savings for businesses?
- Are individuals or businesses paying for the training?
- What are the direct costs of undertaking the training?
- What impact has the regulation had on the number of 18-21 year olds entering the industry?
- Has the regulation had an impact upon wages in the sector?
- Has the regulation affected insurance premiums?
- To what extent has the policy achieved its objectives?
- Has the regulation had an impact on how the industry is viewed as a profession?
- Has average entry age into the industry been reduced (reflecting professionalism)?
- Has the regulation helped to reduce driver shortages?
- Has the regulation facilitated free movement across the EU?
- What impact has the regulation had on the number of traffic collisions?
- What have been the impacts on businesses?
- How do the costs on businesses compare to those that were estimated in the impact assessment?
- What have been the impacts on small and micro businesses?
- Have businesses in the UK been adversely affected compared with their European counterparts?
- Have there been any unintended (positive or negative) consequences?
- Has the reduction in minimum age of licenses had an impact on road safety?

- Has the costs and effort of training discouraged entry to the industry?
- Has there been any spill-over effects resultant from enforcement of CPC?
- Is government intervention still required?
- What would happen if the regulation were to be removed?
- Are the objectives of the regulation still valid?
- Is the existing form of government regulation still the most appropriate approach?

## **9. Annex B: Main Legislative Amendments to the CPC Regulations Since 2007**

<b>Instrument</b>	<b>Main Changes</b>
SI 2008/1965	<ul style="list-style-type: none"> <li>- Introduced a statutory appeals process for providers and course approvals.</li> <li>- Introduced an application procedure and the payment of a £25 fee for a NVT certificate.</li> <li>- Enabled drivers to apply to have issued replacement DQCs if damaged, lost or stolen. (£25 fee)</li> <li>- Introduced a requirement for a person presenting for a CPC test to produce a valid driving licence.</li> </ul>
SI 2011/2324	<ul style="list-style-type: none"> <li>- Requirement for drivers to hold photo-card driving licence in order to be issued a DQC.</li> <li>- Introduced statutory review of regulations.</li> </ul>
SI 2013/2667	<ul style="list-style-type: none"> <li>- Clarified exemptions for drivers of vehicles being taken to specified tests; and being driven by persons whose principal activity is not driving; and transportation is under 50 km from base; and not carrying goods or passengers.</li> </ul>
SI 2014/2264	<ul style="list-style-type: none"> <li>- Expanded forms of acceptable ID.</li> <li>- Introduce appeals process for providers and course approval in N.I.</li> </ul>
SI 2015/2024	<ul style="list-style-type: none"> <li>- Clarified exemptions for persons driving vehicles used by, or under the control of, the prison service.</li> <li>- Extended the radius within which an empty vehicle can be driven from the driver's base without the driver having to obtain a CPC. The radius is extended from 50 kilometres to 100 kilometres</li> <li>- Removes the requirement for persons undertaking their practical CPC test in a category C (lorry), or C+E (lorry and trailer), vehicle for it to have eight or more forward gear ratios</li> </ul>

Other, more minor and technical amendments were made to the Regulation separately in 2008, 2009 and 2010.



## 10. Annex C: References

- AECOM/DSA: *'Driver Certificate of Professional Competence Interim Evaluation'* report (Nov 2012)
- AFT-IFTIM/ETF/IRU/ Skills Training and the Road Transport Sector report: *'Survey on Driver Training Issues'* (June 2012)
- CIECA survey: *'Survey on the implementation of the Directive 2003/59/EC laying down the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passengers'* (January 2010)
- DSA: *'Driver CPC Evaluation Report'* (July 2011)
- DSA public consultation: *'Review of the Driver Certificate of Professional Competence'* (Sept 2013) and the response document of the same title (Nov 2016)
- European Commission held a public consultation: *'Public Consultations: Directive 2003/59/EC on the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passengers'* (July 2013) and the response document of the same title
- European Commission report: *'Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the Implementation of Directive 2003/59/EC relating to the initial qualification and periodic training of drivers of certain road vehicles'* (July 2012)
- European Commission Roadmap: *'Review of Directive 2003/59/EC with a view to clarify and improve certain elements of the current regime and possibly extend its scope'* (October 2013)
- Freight Transport Association report: *'Logistics Report'* (2015)
- Panteia Ex-post evaluation study report: *'Study on the effectiveness and improvement of the EU legislative framework on training of professional drivers'* (Oct 2014)
- Panteia report: *'Report on the Stakeholder Conference on Directive 2003/59/EC on the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passengers'* (April 2014)
- SPA Future Thinking/TfL: *'Freight DCPC Training Effectiveness'* (June 2014)
- RTITB survey: *'Calling All HGV Drivers...'* (March 2016)

## 11. *Annex D: Glossary*

<u><b>Item</b></u>	<u><b>Definition</b></u>
Category C vehicle (LGV)	Lorry
Category D vehicle (PCV)	Bus and coach
Category B vehicle	Car
Category C1 vehicle (LGV)	Medium-sized vehicle 3.5 to 7.5 tonnes
DCPC	Driver Certificate of Professional Competence
IQ	Initial Qualification
DQC	Driver Qualification Card
DVSA	Driver and Vehicle Standards Agency
DfT	Department for Transport
DSA	Driving Standards Agency
VOSA	Vehicle and Operator Services Agency
DVA	Driver & Vehicle Agency (NI)
DoE	Department of Environment (NI)
JAUPT	Joint Approvals Unit for Periodic Training
FTA	Freight Transport Association
RHA	Road Haulage Association
RTITB	Road Transport Industry Training Board
TfL	Transport for London

## **12. Annex E: Glossary of Country Codes**

Code	Country
AT	Austria
BE	Belgium
BG	Bulgaria
CY	Cyprus
CZ	Czech Republic
DE	Germany
DK	Denmark
EE	Estonia
ES	Spain
FI	Finland
FR	France
GR	Greece
HU	Hungary
IE	Republic of Ireland
IT	Italy
LT	Lithuania
LU	Luxembourg
LV	Latvia
MT	Malta
NL	Netherlands
PL	Poland
PT	Portugal
RO	Romania
SE	Sweden
SL	Slovenia
SK	Slovak Republic
UK	United Kingdom