



accidents don't have to happen

Driver Certificate of Professional Competence (DCPC) changes

RoSPA's response to Department for Transport's consultation

April 2023



Response to Department for Transport's consultation: Driver Certificate of Professional Competence (DCPC) changes

Introduction

This is the response of The Royal Society for the Prevention of Accidents (RoSPA) to the Department for Transport's consultation on Driver Certificate of Professional Competence (DCPC) changes. It has been produced following consultation with RoSPA's National Road Safety Committee. We have no objection to our response being reproduced or attributed.

The consultation seeks views on proposed changes to the Driver Certificate of Professional Competence (DCPC).



Response to Department for Transport's consultation: Driver Certificate of Professional Competence (DCPC) changes

About you

Your name:

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You are responding:

On behalf of an organisation.

Your organisation's name is:

The Royal Society for the Prevention of Accidents.

Your organisation is:

A road safety organisation.

Proposals for change

The Driver Certificate of Professional Competence (DCPC) is a qualification that some professional drivers are required to hold in addition to their driver licence. Its objective is to improve:

- road safety
- the professionalism of drivers

The DCPC is initially obtained by completing 4 modularised tests consisting of:

1. A two-part theory test.
2. Case studies.
3. A practical driving test.
4. A practical demonstration of vehicle operation.

Once a driver initially obtains their DCPC, it is valid for 5 years. To maintain the qualification beyond this period, drivers must complete 35 hours of training every 5 years, within an existing validity period, otherwise, the qualification will lapse.

If it does lapse, the DCPC can only be reinstated by completing the remainder of training, which could, depending on how much training the driver had completed up to that point, be the full 35 hours.



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The proposed changes will only apply to commercial driving journeys within Great Britain (GB) and Northern Ireland (NI), should authorities there agree (as DCPC is a devolved matter). Drivers wishing to drive to, from or within the European Union (EU), including the Republic of Ireland, will need to comply with the existing arrangements for renewing the DCPC.

The proposed changes will look to:

- introduce a test option as an alternative to 35 hours of training for drivers renewing their DCPC and whose commercial driving is limited to GB and potentially NI
- remove the requirement for courses to be a minimum of 7 hours, or if split, 3.5 hours long
- remove the requirement that when a training course is split, including where part of this is made up of e-learning, that it must be completed over 2 consecutive days
- remove the operational requirement that only 2 hours of e-learning are permitted per single 'trainer led' course
- introduce a new regime for the re-entry of returning drivers
- allow for short-term extensions to the validity of DCPC and exemptions from the need to hold the DCPC in times of exceptional need for example a pandemic
- allow for the recognition or exchange of qualifications similar to the DCPC but obtained outside of the UK
- allow for the possibility of electronic DCPC evidencing instead of the Driver Qualification Card (DQC)

In your opinion, how effective is the DCPC currently in meeting its stated aim of improving:

	Very effective	Effective	Neither effective or ineffective	Ineffective	Very ineffective	Don't know
Road safety?		X				
Professionalism of drivers?						X



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Why?

RoSPA response

RoSPA believes that as the paper states, professional training and standards are particularly important for drivers of heavier vehicles and the need for the continued maintenance of a level of competence whilst behind the wheel. This is not only for the benefit of drivers themselves, but also for the safety of other road users by ensuring the skills of drivers are regularly updated. Incidents with heavier vehicles are more likely to lead to serious injury or death. Driving a heavier vehicle is significantly different than a car, and as per the hierarchy of road users, those driving the heaviest vehicles have the greatest responsibility to reduce the danger or threat they may pose to other road users.

It is difficult to prove that road safety improvements that have resulted from the DCPC, but the number of accidents involving HGVs has fallen by 68% since 2007, when the DCPC was introduced.

Knowledge is an essential prerequisite for safe road use, and RoSPA therefore will be supportive of proposed measures only where they do not impact on road safety and increase the risk of collisions involving these drivers.

You:

think DCPC doesn't need reforming and should stay the same?

think DCPC should be reformed?

think DCPC should be abolished?

don't know?

Why?

RoSPA response

The DCPC should be reformed.

Although RoSPA recognises that DCPC training is resource-heavy, taking significant time and money, we believe that the DCPC must continue, given that the training relates to issues impacting safety. RoSPA supports the measures in the consultation that add flexibility and reduce time and financial burden to drivers, but only where this is not at the expense of safety.

However, any changes must be clearly explained. RoSPA recognises that the proposed changes could create potential confusion, as there is the possibility that drivers could start to complete training to renew the N-DCPC, but then need to switch to an I-DCPC, increasing time taken and costs.



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RoSPA has some concerns that the periodic test proposal may result in significantly less training being offered and therefore available overall. The test also cannot be tailored to the unique circumstances of each driver's job in the way training allows. However, other on-the-job training, including ensuring skills and knowledge are up-to-date, is not expected to be impacted and could help maintain standards. If this proposal goes ahead, the Department should consider how this on-the-job training can continue to be offered.



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DCPC reform

The changes you think are necessary are to:

- introduce a test option for DCPC periodic renewals?
- offer more flexibility in DCPC training requirements?
- continue developing core content for training modules?
- use more informal assessments after training courses?
- introduce new requirements for drivers looking to re-join the sector?
- allow short-term extensions to DCPC validity periods in exceptional circumstances?
- allow short-term exemptions from needing a DCPC in exceptional circumstances?
- allow the recognition or exchange of qualifications, similar to DCPC, but obtained outside of the UK?
- remove the need for drivers to carry a Driver Qualification Card (DQC) when driving in the UK?

Question?

RoSPA response

RoSPA believes that changes are necessary to:

- offer more flexibility in DCPC training requirements?
- continue developing core content for training modules?
- Allow the recognition or exchange of qualifications, similar to DCPC, but obtained outside of the UK

Overall do you support the proposed changes under the N-DCPC 'Reformed Training' option?



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RoSPA response

Yes.

You think the proposed changes to introduce N-DCPC 'Reformed Training' will:

RoSPA response

- Provide a better work-life balance.
- Help attract and retain drivers.

Overall do you support our proposed changes under the N-DCPC 'Periodic Test' option?

RoSPA response

Yes, but only if on-the-job training is retained to maintain standards.

You think the proposed changes to introduce a N-DCPC 'Periodic Test' will:

RoSPA response

- Save time.
- Make renewing the DCPC cheaper.
- Help attract and retain drivers.

In your view how important is it that GB and NI have the same options for renewing DCPC?

RoSPA response

Important.

Proposed N-DCPC 'Periodic Test'

The proposal is to introduce the N-DCPC 'Periodic Test' alongside the I-DCPC and the suggested N-DCPC 'Reformed Training'.

Successfully passing the N-DCPC 'Periodic Test' would provide a driver with a 5-year entitlement to drive in the GB



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We are consulting on 2 potential test methods for the N-DCPC 'Periodic Test' route option, these are the:

- 'New periodic test' which would be a total of 50 multiple choice and situational judgement questions lasting about 1 to 1 and a half hours, the questions would be designed to test the knowledge and understanding of important material relevant to their work as a professional driver
- 'Initial test re-sit', this would involve drivers re-sitting part of the modularised tests they have to complete to obtain the DCPC qualification initially. These would be the two-part theory test (module one) and a case studies test (module two) or some variation of these. Currently, module one and module two together lasts 3 hours and 55 minutes, costing £60. We are subsequently consulting on how dual licence holders will have their DCPC renewed under the 'initial test re-sit option'.

In your opinion how effective could the 'New periodic test' be in ensuring DCPC meets its stated objective of improving road safety?

RoSPA response

Somewhat effective.

Why?

RoSPA response

RoSPA would expect that if a new periodic test were to be introduced, it would include questions on key safety related topics, such as drivers' hours, manual handling and health and safety. However, the test route would not include tailored training as a training route would. This means that not all elements of the test are likely to be relevant to the driver's role.

In your opinion how effective could the 'New periodic test' be in ensuring DCPC meets its stated objective of improving professionalism of drivers?

RoSPA response

RoSPA is not in a position to comment.



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In your opinion how effective could the 'Initial test re-sit' be in ensuring DCPC meets its stated objective of improving road safety?

RoSPA response

Somewhat effective.

Why?

RoSPA response

RoSPA expects that as the theory test and case studies test need to be sat, this would provide a good refresher of knowledge for drivers. However, as would be the case with a new periodic retest, this would not include tailored training as a training route would. This means that not all elements of the test are likely to be relevant to the driver's role.

In your opinion how effective could the 'Initial test re-sit' be in ensuring DCPC meets its stated objective of improving professionalism of drivers?

RoSPA response

RoSPA is not in a position to comment.

Would you support giving drivers the choice of completing the N-DCPC 'Periodic Test' option along with the existing I-DCPC and N-DCPC 'Reformed Training' option?

RoSPA response

Yes, as long as on-the-job training continues to maintain standards.

Of the 2 test options which do you think is the best option for drivers renewing their DCPC?

RoSPA response

The initial test re-sit.



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Which of these subjects do you think should be included in the new periodic test?

RoSPA response

- Drivers' hours
- Loading and unloading
- Health and safety
- Tachographs
- Manual handling
- Defensive driving and eco driving
- Safe urban driving
- Disability awareness

Eligibility to drive following a test

People who hold the Category C and D driving licence, including their subcategories, are required to have a DCPC qualification when driving for commercial purposes.

Some drivers hold both C and D licences, or a variation of their subcategories. Such drivers are said to have 'dual entitlement' because they are entitled to drive vehicles for which a C licence is required, such as a lorry, and vehicles for which a D licence is required, such as a bus or coach.

When drivers obtain their DCPC qualification for the first time, through the 4 modularised tests, it is limited to the category of vehicle their driving licence relates to. For example, if a driver holds a Category C licence, the DCPC qualification is only valid for driving lorries.

When drivers initially obtain their DCPC the qualification is limited to the vehicles their driving licence permits them to drive.

In your view should DCPC qualification renewal through the initial test re-sit mean the DCPC maintained as a result is limited to the vehicles covered by the driving licence?

RoSPA response

Yes.



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For the new periodic test do you think there should be:

- a. a single test for both category D (bus and coach) and category C (lorry) licence holders?**
- b. different tests for each category, one test for category D (bus and coach) licence holders and another test for category C (lorry) licence holders?**

RoSPA response

Different tests for each category, one test for category D (bus and coach) licence holders and another test for category C (lorry) licence holders.

In the case of dual licence holder (those who have licences to drive C (lorry) and D (bus or coach) category vehicles, including their subcategories) where there are 2 tests, you:

- a. think they should only have to pass either the bus or lorry periodic test for qualification to drive either set of vehicles?**
- b. think they should have to take both tests, the bus and lorry periodic test, for qualification to drive both sets of vehicles?**

RoSPA response

They should have to take both tests, the bus and lorry periodic test, for qualification to drive both sets of vehicles.

In your view should the revision time required for the test and the time needed to take the test be part of drivers working hours?

RoSPA response

RoSPA is not in a position to comment.

In your view how likely are the N-DCPC 'Reformed Training' changes to make it easier to:

- a. Attract drivers that require a DCPC?**
- b. Retain drivers that require a DCPC?**

RoSPA response

a. Neither effective nor ineffective, given that the overall amount of training will not be reduced. RoSPA however does not believe that the amount of training should be reduced.



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b. Effective. Given that the reformed training changes make the renewal of the qualification more flexible, we believe that this would be effective.

What, if any, time limit, between completion of the trainer-led course and corresponding e-learning do you think should be imposed?

RoSPA response

Up to 7 days after the trainer led course.

Do you support the principle of specific return pathways to allow drivers to return to the sector?

RoSPA response

No.

Why?

RoSPA response

Given that one of the aims of the DCPC is to improve road safety, RoSPA would be opposed to allowing someone who had not driven in a professional capacity for a period of time to take less training initially to allow them to return to the sector. If anything, a driver who had taken a break would need more training than someone who had continuously driven and was renewing their DCPC.

Which of the specific return pathways would you support?

RoSPA response

None of these.

Detail what alternative you would suggest.

RoSPA response

RoSPA does not agree with the proposal for specific return pathways and believes that returning drivers should complete the full DCPC as has been the case in the past.



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In your opinion the hours of training that should be completed before a driver is allowed to return to driving commercially is:

RoSPA response

Above 28 and up to 35 hours.

Select as many as appropriate. What subjects do you think should be included in the 'return to driving' module?

RoSPA response

- Drivers' hours
- Loading and unloading
- Health and safety
- Tachographs
- Manual handling
- Defensive driving and eco driving
- Safe urban driving
- Disability awareness

Do you think the proposed changes for returning drivers will make it easier to attract drivers to the sector?

RoSPA response

Yes, RoSPA can see the attraction of drivers needing to complete less training initially to re-join the sector. However, RoSPA is opposed to this on the grounds of safety.

The circumstances you think should trigger short term extensions are:

RoSPA response

- A pandemic for example COVID-19?
- A national or international emergency for example the 2021 fuel tanker shortage?

The circumstances you think should trigger short term exemptions are:

RoSPA response

- A pandemic for example COVID-19?
- A national or international emergency for example the 2021 fuel tanker shortage?



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- Circumstances which would impact on the normal operation of the road transport industry?

In your opinion does the:

a. Maximum extension period of 12 months seem like an appropriate amount of time?

RoSPA response

Yes.

b. Maximum exemption period of 3 months seem like an appropriate amount of time?

RoSPA response

Yes.

In your opinion should short term exemptions only be offered to those who previously held a DCPC but let this lapse?

RoSPA response

Yes.

For this exemption how long, in your view, is an acceptable period for the qualification to have lapsed in months?

RoSPA response

Above 3 months and up to 12 months.

Would you support the creation of an:

a. Exchange scheme for non-GB and non-NI qualifications?

RoSPA response

Yes.

b. Recognition scheme for non-GB and non-NI qualifications?

RoSPA response

Yes.

What is your view on having the DQC replaced by an electronic version?



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RoSPA is in support of the DQC being replaced by an electronic alternative, given that, as the paper states, there is a cost to produce to produce the card and is at risk of being lost or stolen.

RoSPA has no further comments to make on the consultation process, other than to thank the Department for Transport for the opportunity to comment. We have no objection to our response being reproduced or attributed.

