

DRIVER CERTIFICATE OF PROFESSIONAL COMPETENCE SCHEME – IMPROVEMENTS TO ADMINISTRATIVE ARRANGEMENTS

PROPOSAL No.1 – Clarify the CPC Minimum Test Vehicle (MTV) requirements in regulations

Response No.	Category	Response	Comments
1	Not stated	Totally Agree	It makes good sense and provides those applicants precise information as to what is acceptable
2	Not stated	Totally Agree	
3	Not stated	Totally Agree	
4	LGV/PCV Trainer	Totally Agree	This will stop companies with, no knowledge of D.S.A. turning up with vehicles which are not acceptable
5	LGV Trainer	Totally Agree	
6	LGV/PCV Trainer	Confidentiality Requested	
7	Police/Fire/MoD	Totally Agree	
8	ADI	Largely Agree	
9	ADI	Largely Agree	
10	Not stated	Totally Agree	
11	LGV Trainer	Totally Disagree	Why dont you the DSA supply your own vehicles for part 4 My vehicle's will not be made available
12	PCV Trainer	Totally Agree	In order to minimise additional cost, this should be the same as the MTV for practical tests. As a bus operator, we can provide the latest bus types, but they do not have tachographs, whereas our MTV vehicles do.
13	Not stated	Confidentiality Requested	

14	Driver trainer Rep. Organisation	Confidentiality Requested	
15	Not stated	Confidentiality Requested	
16	Driver trainer Rep. Organisation	Totally Agree	
17	Driver trainer Rep. Organisation	Largely Agree	
18	LGV Trainer	Confidentiality Requested	
19	Police/Fire/MoD	Largely Agree	Members agree with the proposal to clarify the minimum test vehicle requirements by specifying them in regulations, as this will provide clear guidance on the type of vehicle that must be used when completing the Module 4 CPC practical test.
20	Not stated		
21	Police/Fire/MoD	Totally Agree	
22	Police/Fire/MoD	Totally Agree	

23	Not stated	Largely Disagree	<p>The proposal to clarify the difference between a category D and D1 vehicle for taking a module 4 test in each category is understood but CPT would contest the assertion from DSA that it will enable trainers to be able to maximise the use of the existing fleet of vehicles. The majority of Operators who carry out their own training and specialist training companies already only have a limited number of vehicles in their training fleets which comply with MTV standards.</p> <p>XXX proposes that a more cost effective and satisfactory solution would be to adopt a different interpretation by DSA of Annex 1 Section 2.2 ii of EC 2003/59/EC. Section 2.2 states the vehicle used for the practical test must meet at least the requirements for test vehicles as defined in Directive 91/439/EEC (which could be interpreted to just cover module 3 the practical test).Section 2.2 ii states a practical test covering the various elements of module 4. If you interpret that there is a difference between " a practical test" and "the practical test" where only "the practical" is required to be conducted with a MTV and a vehicle which meets the relevant PSV Accessibility regulations can be used for "a practical test".</p>
24	Police/Fire/MoD	Totally Agree	
25	Local Authority	Totally Agree	We agree that clarity is important.

26	Not stated	Largely Agree	<p>With regard to proposal number one it is however necessary at this time to consider and take account of DSA current consultation 'Real Weight Requirements for Driving Test Vehicles' on the implementation of Commission Directive 2000/56/EC. This Directive requires that the MTV used for licence acquisition test must satisfy a minimum real weight standard which includes a load being carried on the vehicle. Whilst Cat C1 test is exempt from these requirements, DSA has proposed that to meet the MTV standard Cat C and C+E test vehicles should be laden with an appropriate number of 1000kg Intermediate Bulk Containers filled with water.</p> <p>If as proposed DCPC legislation is cross referenced with "a vehicle that meets the MTV requirements for either a category C or sub-category C1 licence acquisition practical test at the candidate's choice" it is important that at this time DSA considers the appropriateness of the proposed load requirements for module 3 licence acquisition practical test (effective from 2013) with the requirements for DCPC module 4 test.</p>
27	Not stated	Totally Agree	Essential for clarity
28	Not stated	Totally Agree	
29	Govt. Dept.	Totally Agree	
30		Largely Disagree	<p>Must companies only have one or two vehicle's that comply with MTV requirements.</p> <p>Smaller companies may only have one MTV vehicle.</p> <p>We do not see the need to present a MTV vehicle for the module 4 test.</p> <p>There is no requirement in the module 4 test, to have the extra mirrors fitted to the vehicle.</p> <p>This proposal would not allow companies with only one MTV vehicle to continue training candidates while the MTV vehicle is being used for the module 4 test.</p>

31	Trade Assoc.	Totally Agree	We agree with the proposals to clarify the MTV requirements by specifying them regulations
32	Skills Council	Totally Disagree	<p>Whilst we understand the need to “clarify” the requirements in relation to test vehicles, we do not agree with the proposal to require operators to use vehicles of MTV standards.</p> <p>Operators who carry out their own training and specialist training companies have only a limited number of vehicles in their training fleets that comply with MTV standards. The adoption of this proposal is likely to lead to operators and training companies having to incur additional costs converting more vehicles to MTV standards with no added value to either the quality of the test or to the driver.</p>

DRIVER CERTIFICATE OF PROFESSIONAL COMPETENCE SCHEME – IMPROVEMENTS TO ADMINISTRATIVE ARRANGEMENTS

PROPOSAL No.2 – Introduce a minimum three clear working day wait following an unsuccessful CPC test

Response No.	Category	Response	Comments
1	Not stated	Totally Agree	I just wish Learner Drivers had such a short time to wait to be allowed to re-take their practical test, as some may also need their licence for work.
2	Not stated	Totally Agree	Falls in line with other Vocational Tests minimum waiting times
3	Not stated	Totally Agree	
4	LGV/PCV Trainer	Totally Agree	Standards should be improved
5	LGV Trainer	Totally Agree	Module 2 only
6	LGV/PCV Trainer	Confidentiality Requested	
7	Police/Fire/MoD	Totally Agree	
8	ADI	Totally Agree	
9	ADI	Largely Agree	
10	Not stated	Slightly Agree	For the practical test you could reduce the wait to one clear day. This would allow for sufficient training to take place and not make the start to finish process of becoming a professional driver so long and costly.
11	LGV Trainer	Largely Agree	
12	PCV Trainer	Totally Agree	This brings every aspect of licence acquisition and CPC in line.
13	Not stated	Confidentiality Requested	
14	Driver trainer Rep. Organisation	Confidentiality Requested	

15	Not stated	Confidentiality Requested	
16	Driver trainer Rep. Organisation	Totally Agree	
17	Driver trainer Rep. Organisation	Largely Agree	
18	LGV Trainer	Confidentiality Requested	
19	Police/Fire/MoD	Largely Agree	It is not clear if there is evidence that many drivers are repeatedly taking tests following a failure, but it seems logical that those who fail a test should be required to wait for some time before re-sitting a test. This would provide an opportunity to reflect on the circumstances involved regarding their failure and to encourage additional preparation and training.
20			
21	Police/Fire/MoD	Largely Agree	
22	Police/Fire/MoD	Totally Agree	
23	Not stated	Totally Disagree	<p>Whilst the PSV industry has accepted the three day wait between tests for theory (module 1) and practical (module 3) for a number of years and the rationale that in these cases there is often further revision and improving a candidates driving techniques required before they retake the test. This proposal to extend the wait to also include retests for modules 2 and 4 is one the industry doesn't support and challenges DSA's rationale which it has based this on and explained in the consultation document including the financial figures included in the impact assessment as these do not reflect current training rates of pay and costs.</p> <p>XXX would stress this proposal is more about DSA introducing a blanket three</p>

			<p>day wait for all modules rather than examining what is practical and best serves the interests of the candidates who are taking the modules and the wider industry. In the majority of cases after a failed test XXX would contend that the candidate by the very nature of these modules only requires limited additional revision time to pass the module at the second attempt and they should not be seriously disadvantaged by having to wait a full three days (if they can get a test slot in this timescale) before they can retake the test which in practice is costing trainees money, not saving them any as DSA believes.</p> <p>This situation is not helped with the differences which have emerged between tests at DSA centres and tests at Delegated Examiner centres which again clearly demonstrates that trainees are suffering financially under the current practices engaged by DSA. In Delegated Examiner centres the operator is best placed to decide how much additional training is required if a candidate has failed his original module 2 or 4 test to enable him to retake the test. To enforce a three day wait in these circumstances is forcing an unnecessary financial burden on the PSV industry as they have to pay trainees for longer than is really necessary before they are able to become fully qualified PSV drivers and attain the full rate of pay. PSV operators who have to use DSA test centres are forced into the additional expense and lottery of when they will be able to book a module 2 and module 4 re-test. It is not uncommon for operators to have to wait 15 days before they can obtain a test date. This results in operators having to incur the additional financial burden of additional training whilst waiting for a re-test date which particularly for many smaller operators they are unable to bear. Trainees are also severely disadvantaged having to spend a long period on training rates of pay (less than those quoted in the consultation paper) rather than attaining full rates of pay. In some cases operators are considering laying trainees off between tests because they are unable to shoulder the financial burden waiting for a test date. The PSV industry concern is whether trainees will be lost to the industry as a result. If DSA are to enforce a three day wait</p>
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			<p>then they MUST guarantee that a retest will take place three days after the original test and not a longer period as now.</p> <p>Given the experiences of the PSV industry during this transitional year XXX believes once the LGV sector commence module 4 testing from September 09 the waiting times already being experienced will be lengthened considerably thereby increasing the financial burden on industry. In order to reduce this burden and encourage trainees to complete their training and join the industry in a well trained timely manner.</p> <p>XXX PROPOSES AN ALTERNATIVE WAITING PERIOD OF THE NEXT WORKING DAY IS ADOPTED BEFORE RE-TAKING ONLY A MODULE 2 OR 4 TEST.</p>
24	Police/Fire/MoD	Totally Agree	
25	Local Authority	Slightly Agree	We agree that in most cases this may encourage further training but have reservations that certain situations exist where an earlier re-take would be beneficial.
26	Not stated	Largely Agree	
27	Not stated	Totally Agree	Common sense
28	Not stated	Totally Agree	
29	Govt. Dept.	Largely Agree	
30		Totally Disagree	<p>Whilst we understand the reasons why DSA want to introduce a 3 day wait, we do not agree with it.</p> <p>Companies with delegated examiners could ensure that candidates can retake the test after 3 days.</p> <p>Can DSA guarantee they can rebook tests on the fourth working day after a candidate fails</p> <p>It will add extra costs to operators, who will have to pay trainees while they wait for a new test slot.</p>

			Also when the LGV sector start with CPC in September waiting times for tests will become longer.
31	Trade Assoc.	Largely Agree	We agree with this proposal
32	Skills Council	Totally Disagree	<p>We recognise that there could be potential value in this proposal. However, on balance, we believe that delaying re-testing is not in the interests of either the driver or the operator. The imposition of a minimum waiting period will have the effect of leaving drivers and operators stranded whilst they wait for a window to take the test – whilst some drivers may benefit from this additional learning time, the key issue is that this waiting period will slow down the achievement process and have a negative financial impact on operators and on individual drivers. This is not in the interest of individual drivers or operators.</p> <p>The three-day waiting period is even more problematic if the test failed is Module 2. If proposal 6 is introduced, it will not be possible to book Module 4 until after Module 2 has been achieved – as a result, an additional three-day waiting period will have a knock-on affect on Module 4 and may result in increased delays for the driver and operator.</p>

DRIVER CERTIFICATE OF PROFESSIONAL COMPETENCE SCHEME – IMPROVEMENTS TO ADMINISTRATIVE ARRANGEMENTS

PROPOSAL No.3 – Introduce a minimum cancellation period of three clear working days

Response No.	Category	Response	Comments
1	Not stated	Totally Agree	This will then bring cancellations in line with Learner cancellation requirements
2	Not stated	Totally Agree	System is open to abuse otherwise with the risk of DSA losing out on revenue. This will only result in even higher test fees for all of us
3	Not stated	Totally Agree	
4	LGV/PCV Trainer	Totally Agree	If any test cancelled by trainee booker a fee of £50 - should be charged this will stop companies block booking with no intention of using test, just blocking system
5	LGV Trainer	Largely Agree	
6	LGV/PCV Trainer	Confidentiality Requested	
7	Police/Fire/MoD	Largely Disagree	
8	ADI	Totally Agree	
9	ADI	Largely Agree	
10	Not stated	Totally Agree	
11	LGV Trainer	Largely Agree	
12	PCV Trainer	Totally Agree	Again, everything is treated in the same way.
13	Not stated	Confidentiality Requested	
14	Driver trainer Rep. Organisation	Confidentiality Requested	

15	Not stated	Confidentiality Requested	
16	Driver trainer Rep. Organisation	Totally Agree	
17	Driver trainer Rep. Organisation	Largely Agree	
18	LGV Trainer	Confidentiality Requested	
19	Police/Fire/MoD		
20			
21	Police/Fire/MoD	Totally Agree	
22	Police/Fire/MoD	Totally Agree	
23	Not stated	Totally Disagree	<p>For reasons already explained in response to proposal 2 XXX is supportive of measures which will increase the number of test slots at DSA test centres and the introduction of this proposal should improve this position and the introduction of the XXX alternative proposal 2 would ensure the best practical use is made of test slots thrown up by this proposal.</p> <p>The majority of PSV licence acquisition tests are conducted by Delegated Examiners and not at DSA test centres there is therefore no logic to this proposal being applied to delegated examiner centres apart from DSA introducing administrative uniformity.</p> <p>XXX IS STRONGLY OPPOSED TO THIS PROPOSAL BEING APPLIED TO DELEGATED EXAMINER CENTRES AS IT INTRODUCES AN UNNECESSARY ADMINISTRATIVE AND FINANCIAL BURDEN TO A SECTOR OF INDUSTRY WITHOUT JUSTIFICATION</p>

24	Police/Fire/MoD	Totally Agree	
25	Local Authority	Largely Agree	We have no objections to this proposal.
26	Not stated	Largely Agree	
27	Not stated	Totally Agree	Good, bearing in mind your 11.26 (medical).
28	Not stated	Totally Agree	
29	Govt. Dept.	Largely Agree	
30		Largely Agree	<p>No problem with this proposal</p> <p>We note that the consultation expressly excludes the application of the cancellation fee in the context of practical test conducted by delegated examiners (paragraph 11.25) and we welcome this statement.</p>
31	Trade Assoc.	Largely Agree	
32	Skills Council	Totally Disagree	<p>We agree that this measure should help to increase the availability of testing in some circumstances. However, it is not clear why it should apply to theory tests undertaken in the delegated examiner context. This appears to be unjustified as it will not impact outside of the specific delegated context.</p> <p>We note that the consultation expressly excludes the application of the cancellation fee in the context of practical test conducted by delegated examiners (paragraph 11.25) and we welcome this statement.</p>

DRIVER CERTIFICATE OF PROFESSIONAL COMPETENCE SCHEME – IMPROVEMENTS TO ADMINISTRATIVE ARRANGEMENTS

PROPOSAL No. 4 – Introduce a right for examiners to refuse to conduct a theory or practical CPC test in certain circumstances and for the fee to be forfeited

Response No.	Category	Response	Comments
1	Not stated	Totally Agree	This too is in line with Learner requirements which then makes for clarity across the board of all classes of vehicle
2	Not stated	Totally Agree	
3	Not stated	Largely Agree	
4	LGV/PCV Trainer	Totally Agree	
5	LGV Trainer	Totally Agree	
6	LGV/PCV Trainer	Confidentiality Requested	
7	Police/Fire/MoD	Slightly Disagree	
8	ADI	Totally Agree	
9	ADI	Slightly Agree	I agree in principle with the proposal, however the circumstances in which an examiner can refuse to conduct a test must be minimal and widely publicised. I strongly believe that candidates should have a right to appeal any refusal to conduct a test.
10	Not stated	Totally Agree	
11	LGV Trainer	Totally Disagree	Fee only
12	PCV Trainer	Totally Agree	Everything is clarified and we all know where we stand.

13	Not stated	Confidentiality Requested	
14	Driver trainer Rep. Organisation	Confidentiality Requested	
15	Not stated	Confidentiality Requested	
16	Driver trainer Rep. Organisation	Totally Agree	
17	Driver trainer Rep. Organisation	Largely Agree	It was pointed out by one member that occasionally he had found examiners to state that tyres or a part of a vehicle was not adequate only to take the vehicle to a testing premise and be told it was. This was especially true of tyres.
18	LGV Trainer	Confidentiality Requested	
19	Police/Fire/MoD	Largely Agree	Members agree with the proposal that examiners be given the right to refuse to conduct theory or practical CPC tests in certain circumstances and the fee is forfeited. This would perhaps encourage candidates and act as an incentive to be better prepared for the test in the knowledge that they may lose the opportunity for a test and the fee itself.
20	Not stated		
21	Police/Fire/MoD	Totally Agree	
22	Police/Fire/MoD	Totally Agree	

23	Not stated	Totally Disagree	<p>The proposal as detailed in the consultation paper has failed to fully explain the circumstances where an examiner will refuse to carry out a test and does not explain the extent of this problem. How many tests have been refused to be conducted since September 08 because of incorrect documentation or type of vehicle presented?</p> <p>The consultation implies this proposal will result in lower fees due to aborted tests and forfeited fees. What is the estimated amount of reduced fees per test for 09/10, 10/11 as a result of the introduction of this proposal?</p> <p>In these circumstances this proposal should be deferred until such time as the correct information is able to be provided by DSA.</p>
24	Police/Fire/MoD	Totally Agree	
25	Local Authority	Totally Agree	We strongly agree that this right should be specified to avoid misunderstandings
26	Not stated	Largely Agree	
27	Not stated	Totally Agree	Only logical.
28	Not stated	Totally Agree	
29	Govt. Dept.	Totally Agree	
30		Slightly Agree	The proposal appears to be sensible. However, the consultation paper does not clearly specify what constitutes the “certain circumstances” where an examiner might refuse to conduct a test.
31	Trade Assoc.	Largely Agree	We agree as long as it is in accordance with clearly defined parameters that have been communicated to those involved in providing test vehicles

32	Skills Council	Slightly Disagree	The proposal appears to be sensible. However, the consultation paper does not clearly specify what constitutes the “certain circumstances” where an examiner might refuse to conduct a test. Operators and individual drivers would need to have clear guidance on how this would work in practice before the proposal could be implemented eg a decision on the MTV discussed in proposal 1 would need to be confirmed. The consultation paper does not set out the potential volume of the tests that might be refused.
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DRIVER CERTIFICATE OF PROFESSIONAL COMPETENCE SCHEME – IMPROVEMENTS TO ADMINISTRATIVE ARRANGEMENTS

PROPOSAL No. 5 – Introduce a Trainer Booking Facility for CPC tests

Response No.	Category	Response	Comments
1	Not stated	Slightly Agree	The impact of having A TBF for the larger vehicle categories does not have the same impact as it would for the Learner class in 'cars'. There are fewer tests in the larger class of vehicle so it should not block independent traders from getting tests that they may wish to book singularly.
2	Not stated	Totally Agree	
3	Not stated	Totally Agree	
4	LGV/PCV Trainer	Totally Agree	
5	LGV Trainer	Totally Agree	
6	LGV/PCV Trainer	Confidentiality Requested	
7	Police/Fire/MoD	Totally Agree	
8	ADI	Totally Agree	
9	ADI	Totally Agree	
10	Not stated	Totally Agree	
11	LGV Trainer	Largely Agree	
12	PCV Trainer	Totally Agree	Again, this makes planning so much easier and takes away the problem of trying to be first on the phone to get slots.
13	Not stated	Confidentiality Requested	

14	Driver trainer Rep. Organisation	Confidentiality Requested	
15	Not stated	Confidentiality Requested	
16	Driver trainer Rep. Organisation	Totally Agree	
17	Driver trainer Rep. Organisation	Largely Agree	
18	LGV Trainer	Confidentiality Requested	
19	Police/Fire/MoD		
20	Not stated		
21	Police/Fire/MoD	Totally Agree	
22	Police/Fire/MoD	Totally Agree	
23	Not stated	Totally Agree	XXX supports the introduction of this facility as it will enable all organisations which carry out PCV training to have the same access to testing arrangements.
24	Police/Fire/MoD	Totally Agree	
25	Local Authority	Totally Agree	We agree with this proposal.
26	Not stated	Largely Agree	
27	Not stated	Totally Agree	Sensible
28	Not stated	Totally Agree	Please consider that the translators have access to the booking system. It would ease the Pearson booking call centre and greatly help the translators for other languages to book the test. The current solution (phone calls) is very awkward for us to use.
29	Govt. Dept.	Largely Agree	

30	Not stated	Totally Agree	We support this proposal
31	Trade Assoc.	Largely Agree	
32	Skills Council	Totally Agree	We support the introduction of this facility as it will enable all organisations which carry out PCV training to have the same access to testing arrangements.

DRIVER CERTIFICATE OF PROFESSIONAL COMPETENCE SCHEME – IMPROVEMENTS TO ADMINISTRATIVE ARRANGEMENTS

PROPOSAL No. 6 – Introduce a requirement to pass a Module 2 test before booking a Module 4 test

Response No.	Category	Response	Comments
1	Not stated	Totally Agree	It makes good common sense that any theory examination should be undertaken prior to attempting the practical elements of the examinations. It should also cut down on any unnecessary testing which would be environmentally unfriendly.
2	Not stated	Totally Agree	Falls in line with other similar driver testing systems whereby a Driving Theory Test must be passed before the Practical Driving Test
3	Not stated	Totally Agree	
4	LGV/PCV Trainer	Totally Agree	
5	LGV Trainer	Totally Agree	
6	LGV/PCV Trainer	Confidentiality Requested	
7	Police/Fire/MoD	Largely Agree	
8	ADI	Totally Agree	
9	ADI	Totally Agree	
10	Not stated	Totally Agree	
11	LGV Trainer	Totally Disagree	Why?
12	PCV Trainer	Totally Agree	It makes sense to ensure that the theory is right before attempting the practical.
13	Not stated	Confidentiality Requested	

14	Driver trainer Rep. Organisation	Confidentiality Requested	
15	Not stated	Confidentiality Requested	
16	Driver trainer Rep. Organisation	Totally Agree	
17	Driver trainer Rep. Organisation	Largely Agree	
18	LGV Trainer	Confidentiality Requested	
19	Police/Fire/MoD	Largely Agree	The proposal to introduce a requirement to pass a Module 2 test before booking a Module 4 test is logical since it will ensure that only those who have completed Module 2 can apply to undertake the Module 4 test.
20	Not stated		
21	Police/Fire/MoD	Totally Agree	
22	Police/Fire/MoD	Totally Agree	
23	Not stated	Totally Disagree	<p>The current system prior to the issuing of this consultation document has produced a number of unnecessary delays and difficulties in operators being able to book module 4 tests. Many operators have been booking module 2 and 4 tests at the same time to reduce the delays with candidates already having to wait long periods between passing a module 2 and taking a module 4 test.</p> <p>This proposal now proposes to lengthen this process without justification apart from DSA explaining its IT system cannot be easily adapted to deal with the current arrangements and as a result are claiming a benefit of £223k in not</p>

			<p>having to implement this IT change over a 5 year period. XXX challenges this financial assumption because DSA has failed to take into account the additional costs to industry caused by lengthening the waiting periods which should be used to reduce this perceived benefit to DSA and obtain a true figure which correctly reflects the impact of this proposal on industry</p> <p>XXX STRONGLY OPPOSES THE INTRODUCTION OF THIS PROPOSAL as it will add further financial burdens to operators and financial loss to trainees through the extension of waiting times between completing these modules.</p> <p>XXX FURTHER STRONGLY OBJECTS TO DSA ARBITRALLY INTRODUCING THIS PROPOSAL FROM THE END OF MAY WITHOUT NOTICE TO THE INDUSTRY AND CONTRARY TO THE IMPLEMENTATION DATE LISTED IN THE CONSULTATION DOCUMENT</p>
24	Police/Fire/MoD	Totally Agree	
25	Local Authority	Slightly Agree	We understand the reasoning for this proposal but believe that certain circumstances exist where the ability to secure a practical test date before passing a theory test would be beneficial.
26	Not stated	Largely agree	
27	Not stated	Totally Agree	Quite right.
28	Not stated	Totally Agree	
29	Govt. Dept.	Largely Agree	
30	Not stated	Totally Disagree	<p>Our major concern with this proposal is the potential delays that this system will produce.</p> <p>If drivers have to pass module 2 before they can book a module 4 test, this could lead to significant delays in drivers achieving their full Driver CPC.</p> <p>The period between achieving module 2 and securing a test slot for module 4 will have financial implications for drivers (who may not have access to a full salary) and for operators (who will have to pay inactive drivers).</p>

31	Trade Assoc.	Largely Agree	We agree it is sensible to insist that the theory test must be passed before being able to take a practical test
32	Skills Council	Totally Disagree	<p>Our major concern with this proposal is the potential delays that this system will produce. If drivers have to pass module 2 before they can book a module 4 test, this could lead to significant delays in drivers achieving their full Driver CPC. The period between achieving module 2 and securing a test slot for module 4 will have financial implications for drivers (who may not have access to a full salary) and for operators (who will have to pay inactive drivers).</p> <p>The requirement to achieve module 2 before taking module 4 is unhelpful in any case as the decision to implement this requirement has a negative impact on the potential for drivers to take advantage of NVT schemes.</p>

DRIVER CERTIFICATE OF PROFESSIONAL COMPETENCE SCHEME – IMPROVEMENTS TO ADMINISTRATIVE ARRANGEMENTS

PROPOSAL No. 7 – Introduce a requirement for ‘acquired rights’ drivers to exchange their old style (paper) driving licence for a photocard licence before completing their periodic training

Response No.	Category	Response	Comments
1	Not stated	Totally Agree	Administratively I believe it will help in keeping costs down if everyone in all class of vehicle categories had the same type of licence.
2	Not stated	Totally Agree	<p>Although it can be acknowledged that there will of course be another additional fee that will have to be paid to DVLA for the conversion to Photocard format.</p> <p>As with all analog to digital transfers, the accuracy of the transfer will be crucial from DVLA's Point of View. They have been known to make some mistakes to people's driving records that have resulted in some licence holders having some entitlements not added, or entitlements replaced in lieu of others</p>
3	Not stated	Totally Agree	
4	LGV/PCV Trainer	Totally Agree	Paper licence should be changed as soon as practical
5	LGV Trainer	Totally Agree	
6	LGV/PCV Trainer	Confidentiality Requested	
7	Police/Fire/MoD	Totally Agree	
8	ADI	Totally Agree	

9	ADI	Totally Disagree	<p>Acquired rights drivers who hold the old style paper licence will generally will be the drivers who have held the licence for a number of years. By default these drivers will have to renew their licence at age 45 and every 5 years thereafter, a photocard driving licence will be issued at this stage. One of the biggest selling points for drivers concerning this legislation, is that the cost of the qualification card is included in the training and a separate application does not have to be made. The driver CPC Periodic training guide for lorry, bus and coach drivers states:</p> <p>"You will be able to prove you hold Driver CPC by a Driver Qualification Card (DQC).The card will be issued to new drivers automatically on successfully passing the initial qualification. Existing drivers (holding a GB photo card licence) will be automatically issued with the card on completion of the 35th hour of periodic training. For existing drivers, their 'acquired rights' means that their driving licence will be accepted as proof of their Driver CPC status until they have completed their 35 hours training within the first 5 year cycle at which point they will be issued with a DQC. There will be no charge for the card at point of issue."</p> <p>Some drivers will already have to pay for this training, adding this extra cost will lead many to consider not doing any training or worst still leaving the profession all together. Going forward the Road Haulage and Coach industries do not need another driver shortage, caused by needless over- regulation.</p> <p>Before I can start to agree with this proposal I need to know exactly how many drivers would be affected, it can't be beyond the capability of the DSA & DVLA the work out</p>
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			<p>a. How many drivers hold paper licences? b. How many of those drivers will have to renew within the next 5 years due to age?</p> <p>Photo cards have been issued since July 1999 so a driver passing his test before this will have held a paper licence for a minimum of 14 years. The majority of these drivers will now be driving vehicles with digital tachographs fitted. It follows that these drivers will have already provided a photograph in order to gain a digital card.</p> <p>The cost to renew a digital card is currently £19.00. If a driver has to obtain a photocard licence at the same time because he has completed his periodic training the cost would be £39.00, add to the cost of carrying out 35 hours of training @ £560 inc VAT and a driver is looking at a losing a big chunk of his wage just to remain in the industry.</p> <p>How many other employees have to fork out this much money for the privilege of working?</p> <p>The DSA charges trainers £1.25 per training hour trained for each driver. A 35 hour training course for one driver will cost the trainer £43.75 to upload. As the number of drivers in this group will be relatively small, I think the DSA could well afford to absorb the cost of the card for these drivers.</p>
10	Not stated	Totally Agree	
11	LGV Trainer	Totally Disagree	Why?
12	PCV Trainer	Slightly Agree	As long as they are aware of the financial implication I am not convinced that it matters.

13	Not stated	Confidentiality Requested	
14	Driver trainer Rep. Organisation	Confidentiality Requested	
15	Not stated	Confidentiality Requested	
16	Driver trainer Rep. Organisation	Totally Agree	
17	Driver trainer Rep. Organisation	Largely Agree	
18	LGV Trainer	Confidentiality Requested	
19	Police/Fire/MoD	Largely Agree	Members support the proposal to require the exchange of old style driving licences to facilitate the issuing of Driver Qualification Cards. The case for doing so makes sense and will ensure that driving records are up to date. There may be many holders of old style licences, whose current address is not shown on thier licence and this is an opportunity to update them and to ensure that they hold a licence with their photograph thereon.
20	Not stated		
21	Police/Fire/MoD	Largely Agree	
22	Police/Fire/MoD	Totally Agree	

23	Not stated	Totally Disagree	<p>The previous CPC consultation from DSA in 2007 already encouraged drivers with paper licences to exchange them for a photocard licence before they complete their periodic training. The financial costings included in the annex as justification for introducing this proposal appear to be flawed as far as the PCV sector is concerned. Since 1998 all new licence, vocational licence acquisitions, change of address and medical renewals for those over 45 years has resulted in the driver receiving a photocard licence. Within the PCV sector it is only those drivers who are currently under 45, have never changed their address and obtained their vocational licence before 1998 who will still be in possession of just a paper licence. Evidence from our operator members indicate this is less than 10% of the industry.</p> <p>XXX does not see any value in DSA introducing such a requirement into regulation as the change will happen naturally through the above in the period leading up to 2013/14. XXX recommends DSA & DVLA communicate direct with those who have just a paper licence and offer a free exchange to a photocard licence to those who will not be required through medical age renewal to obtain a photocard licence prior to 2014</p>
24	Police/Fire/MoD	Totally Agree	
25	Local Authority	Slightly Agree	We have no particular view on this proposal.
26	Not stated	Largely Agree	
27	Not stated	Totally Agree	Very good.
28	Not stated	Totally Agree	

29	Govt. Dept.	Slightly Agree	<p>This will require legislative change which will take some time. It is mentioned in the consultation that no change to the regulations would require a paper licence application process to be developed at a high capital cost. As this suggests that such a system is not under development what contingency is being put in place for drivers without a photocard licence who complete their periodic CPC training in the interim? The consultation states that there are around 100,000 paper licence holders out there, if only one of these completed their periodic training ahead of the legislative change would that not require a paper licence process to be developed?</p> <p>As the Agency charged with enforcing the scheme we would like the issue of DQCs to be as straightforward as possible and agree with the reasoning of this proposal; however this proposal would potentially provide two separate systems; the scenario that the proposal was intended to avoid.</p>
30	Not stated	Totally Agree	Only a small number of PCV drivers will have old style (paper) licences
31	Trade Assoc.	Largely Agree	We agree that acquired rights drivers should be obliged to change their licence although remain very concerned that this will add considerably to the total cost of Driver CPC acquisition
32	Skills Council	Slightly Disagree	This will impact on only a small minority of drivers in the passenger transport sector. DSA will need to communicate this requirement to drivers.

DRIVER CERTIFICATE OF PROFESSIONAL COMPETENCE SCHEME – IMPROVEMENTS TO ADMINISTRATIVE ARRANGEMENTS

CONSULTATION CRITERIA: Did this consultation paper meet the consultation criteria at *Annex G*?

Response No.	Category	Response	Comments
1	Not stated	Totally Agree	No Additional Comment
2	Not stated	Totally Agree	
3	Not stated	Largely Agree	
4	LGV/PCV Trainer	Totally Agree	
5	LGV Trainer	Totally Agree	
6	LGV/PCV Trainer	Confidentiality Requested	
7	Police/Fire/MoD	Totally Agree	
8	ADI	Largely Agree	
9	ADI	Slightly Agree	
10	Not stated	Totally Agree	
11	LGV Trainer		
12	PCV Trainer	Totally Agree	
13	Not stated	Confidentiality Requested	
14	Driver trainer Rep. Organisation	Confidentiality Requested	
15	Not stated	Confidentiality Requested	

16	Driver trainer Rep. Organisation	Totally Agree	
17	Driver trainer Rep. Organisation	Largely Agree	
18	LGV Trainer	Confidentiality Requested	
19	Police/Fire/MoD		N/A
20	Not stated		
21	Police/Fire/MoD	Totally Agree	
22	Police/Fire/MoD	Totally Agree	
23	Not stated	Totally Agree	
24	Police/Fire/MoD		
25	Local Authority	Totally Agree	
26	Not stated		
27	Not stated	Totally Agree	BUT: Please heed my protests about official documents implicitly endorsing lies about anthropogenic CO2.
28	Not stated	Totally Agree	
29	Govt. Dept.	Totally Agree	
30	Not stated	Largely Agree	
31	Trade Assoc.		
32	Skills Council	Largely Agree	

DRIVER CERTIFICATE OF PROFESSIONAL COMPETENCE SCHEME – IMPROVEMENTS TO ADMINISTRATIVE ARRANGEMENTS

Impact Assessment: If you think any of the estimated costs or benefits referred to in the Initial Impact Assessments (Annexes A-F) are incorrect please provide alternatives

Response No.	Category	Response	Comments
1	Not stated		N/A
2	Not stated		
3	Not stated		
4	LGV/PCV Trainer		No
5	LGV Trainer		
6	LGV/PCV Trainer		
7	Police/Fire/MoD		
8	ADI		
9	ADI		The DSA charges trainers £1.25 per training hour trained for each driver. A 35 hour training course for one driver will cost the trainer £43.75 to upload. As the number of drivers in this group will be relatively small, I think the DSA could well afford to absorb the cost of the card for these drivers
10	Not stated		
11	LGV Trainer		Sorry no alternatives I think your propoganda crap in Annexes A-F is very good.
12	PCV Trainer		
13	Not stated		

14	Driver trainer Rep. Organisation		
15	Not stated		
16	Driver trainer Rep. Organisation		
17	Driver trainer Rep. Organisation		
18	LGV Trainer		
19	Police/Fire/MoD		N/A
20	Not stated		
21	Police/Fire/MoD		
22	Police/Fire/MoD		
23	Not stated		In addition to comments already made in the main body of responses, CPT has concerns at the hourly rate of £10.18p being used as the rate per hour. It should also be noted that within the PSV sector the weekly hours a trainee covers is between 37 - 40 hours eg a 7-8 hour day and not 9 hours often referred to by DSA. By using these lower figures then this will have an impact on the levels of saving/benefit being claimed by DSA for each of these proposals.
24	Police/Fire/MoD		
25	Local Authority		
26	Not stated		
27	Not stated		
28	Not stated		
29	Govt. Dept.		
30	Not stated		
31	Trade Assoc.		
32	Skills Council		