



National Register of LGV Instructors: Response to the consultation Changes to HGV and bus driving tests and allowing car drivers to tow a trailer without an extra test

Introduction

This briefing note contains the responses made by NRI to the consultation. The NRI response to this consultation draws on the experience of the NRI team of examiners and a survey among the 650 registered NRI instructors which elicited 74 complete responses. Note that NRI answered only the questions relevant to its status and scope.

Question 5

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

Strongly agree

Agree

Disagree

Strongly disagree

Don't know

If disagree, please explain.

This proposal raises road safety risks which lead us to strongly disagree with it. The step from driving at Cat B (car/van) to driving laden Cat C+E vehicles, in terms of the size, handling characteristics and risks to other road users is large. It is larger now that it was in the 1980's when the staging was introduced, as roads are busier and layouts more complex.

Simply removing the staging, with no other measures in place, has the potential to result in a significant reduction in the C+E pass rate, with inexperienced, underprepared candidates coming forward. This would be counter to one of the key aims of this package of changes, which is to maximise the efficient deployment of the DVSA testing resources.

Were the staging requirements to be removed, we therefore suggest that there should be a prescribed, controlled C+E training process, based on DVSA's published driving standards,

which is designed to ensure that drivers gain the knowledge and skills needed before coming forward for test. The test should be the confirmation of a structured training programme. Such training would ideally include experience in a Cat C vehicle, to develop appreciation of their driving environment and road characteristics alongside those of a Cat C+E vehicle.

Question 6

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

Strongly agree

Agree

Disagree

Strongly disagree

Don't know

Question 7

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

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

Yes

No

Don't know

Please explain your answer below or leave blank if don't know

By removing the Cat C stage and the associated test fee, there is a potential financial benefit in terms of a saving in the cost of test fees paid by the driver/their employer to achieve C+E entitlement.

If it improves the availability of C+E tests, it may re-kindle interest among younger people considering a career in the industry as an articulated lorry driver and who have been put off committing to training by the cost of two tests and reports of delays in getting DVSA tests.

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

Yes

No

Don't know

Please explain your answer below or leave blank if don't know

Implementing the flexibility without other measures could result in candidates lacking experience or training being presented for C+E test, resulting in more failed tests, meaning more C+E tests being needed.

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

Yes

No

Don't know

Please explain your answer below or leave blank if don't know

The industry reports that insurers are reluctant to insure newly qualified drivers as it is, so any real or expected rise in vehicle damage claims or incidents involving other road users associated with C+E drivers who have achieved their licence without staging, may result in raised insurance premiums.

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

Yes

No

Don't know

Please explain your answer below or leave blank if don't know

As we indicated in response to Question 5, the key risk is to road safety. We believe that good driver development practice involves drivers getting used to driving a Cat C vehicle before taking the additional step of adding the trailer or drag (C+E). The flexibility has the risk of more incidents and accidents.

Question 8

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

Strongly agree

Agree

Disagree

Strongly disagree

Don't know

Question 9

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

From our research among NRI instructors, opinion is equally divided between those who consider that this will increase demand for C+E tests and those who think it won't lead to any change in demand. Only a very few think it will reduce demand.

Question 11

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

Yes

No

Don't know

We describe the risk to road safety in terms of a risk of more incidents and accidents. To mitigate this, drivers need to get used to driving a large vehicle before taking the additional step of adding the trailer.

While it may be true that most training programmes to gain the C+E licence will involve driving and gaining competence in a Cat C vehicle, there is a risk that given the pressing shortage of C+E drivers, companies or training organisations will feel pressured to design a course solely to pass the C+E test and will not provide Cat C experience to the driver. Cat C experience and skills cannot be assumed.

Question 12

Do you think this would impact trainers, in terms of their existing fleet of training vehicles and costs?

Yes

No

Don't know

As explained above, to build driving skills and experience, including appreciation of Cat C vehicles, C+E courses may need to be longer in duration, perhaps as much as twice as long as they currently are. If trainers maintained the same fleet capacity and number of trainers, this has the potential to halve the training capacity as only one course could be held over the same period which two courses could currently be held, thus reducing the total number of drivers being trained. To maintain the same level of safety standards, as well as the same number of courses, trainers would have to double the size of their fleets, and double the number of trainers.

Therefore capacity will either drop, or trainers will have to acquire new training vehicles and new instructors to make sure that they can keep training the same number of drivers.

Question 13

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

Strongly agree

Agree

Disagree

Strongly disagree

Don't know

Question 14

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

Strongly agree
Agree
Disagree
Strongly disagree
Don't know

If disagree, please explain.

There is no evidence to support the restriction of supervised training of C+E simply on the grounds of age. Age is not a proxy for experience or competence. All Category C licence holders should have by right, a provisional licence for C+E to allow training to take place irrespective of their age.

Questions on amendment 2 – considering alternative arrangements for the conduct of the reversing manoeuvres.

Question 15

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

Strongly agree
Agree
Disagree
Strongly disagree
Don't know

Question 16

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

Yes
No
Don't know

While 60% of the NRI register members surveyed saw no barriers to training organisations conducting this assessment and cited the current arrangements for DCPC Module 4 tests as a precedent, 40% of respondents identified barriers. These barriers are:

- *Access to a space large enough that meets current DVSA specification for the manoeuvres or will be deemed acceptable by DVSA to conduct the tests.*
- *In any arrangement, the individual conducting the assessment should not have been the instructor for that driver. This reflected concerns about the blurring of the relationship with the trainee driver, which is based on support and trust – which can be prejudiced when the trainer becomes the assessor.*

- *If arrangements were similar to those for the current Mod 4 tests which are conducted by training providers, there would there be a requirement for whomever was conducting the assessment to have no contact with the trainee which would mean organisations would need to employ someone specifically for the role.*

Question 17

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

1. Existing or new HGV trainers being authorised (35%)
2. Only those trainers who are members of either of the two voluntary HGV training registers? (32%)
3. Trainers who hold specific professional qualifications
4. Other (please specify)

As members of one of the two, not for profit, voluntary registers of HGV instructors identified in the consultation, NRI register members feel confident that through the process of initial examination and five-yearly re-examination, they are appropriately qualified to carry out this assessment. They say this because the NRI LGV Instructor examination is based on DVSA's published standards for LGV driving and the content of former DVSA voluntary register of LGV instructors. The NRI was launched in 2017 in close consultation with DVSA and is DVSA endorsed.

The NRI examination includes techniques for the instruction and assessment of the DVSA manoeuvres and the coupling exercise. As far as we are aware the NRI (and NVDIR) examinations are the only nationally available examinations designed specifically to test LGV (HGV) Instructional and assessment skills in line with DVSA standards.

NRI is solely an examination body; neither it nor the team of NRI examiners have any involvement in candidate training or preparation for examination. The five-yearly renewal requirement ensures that skills and competence are maintained.

The voluntary registers and the examination centres associated with them have stimulated the market for LGV instructor and assessor training and existing or new trainers will be able to access examination and where required, preparatory training. This infrastructure is in place and operating now.

While NRI register members indicate that the NRI Instructor and Assessor examinations, which are independently assessed are very well suited to the authorisation of assessors, they note other qualifications or recognitions which might also be identified as appropriate for the conduct of the assessments and could be used as the basis for authorisation; such as end-point assessors for the LGV Driver apprenticeship standard. However none of these have the direct link to DVSA standards and the LGV testing process that NRI has.

Question 18

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

1. A scheme that is as light touch as possible for authorisation and ongoing assurance, with minimal involvement from DVSA.
2. A fully regulated scheme with provision for formal quality assurance checks, removal of authorisation and an appeal mechanism.
3. Other (please specify)

80% of the NRI register members would prefer a fully regulated scheme – one that is backed by regulation or oversight by DVSA. This is consistent with feedback from the training industry in 2016, at the time that NRI was established, which centred on the lack of government regulation of LGV driver training and the depressing effect that can have on standards of instruction and ethical business behaviour.

This is not a call for DVSA to run the scheme, but a call for DVSA to have formal, regulatory oversight of a scheme (or schemes) of qualification and on-going competence checks that is mandatory for all those wanting to carry out assessment of the manoeuvres and the coupling exercise.

Question 19

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

Yes

No

Don't know

Just over half of the respondents to our survey of NRI Instructors shared concerns that without clear and effective oversight by DVSA, the delegation of the manoeuvres and the coupling exercise could create conflicts of interest for the training organisations authorised to conduct the tests and that this could lead, or lead to perceptions of 'poor assessment' or a 'watered down test'.