

Changes to HGV and bus driving tests and allowing car drivers to tow a trailer without an extra test

RoSPA's response to DVSA's consultation

Response to DVSA's consultation: Changes to HGV and bus driving tests and allowing car drivers to tow a trailer without an extra test

Introduction

This is the response of The Royal Society for the Prevention of Accidents (RoSPA) to DVSA's consultation on changes to HGV and bus driving tests and allowing car drivers to tow a trailer without an extra test. 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 proposals to:

- allow drivers to take one test to drive both a rigid and articulated lorry, rather than having to pass a test in a rigid lorry first, and then another in an articulated lorry
- allow drivers who want to use a bus or coach to tow a trailer to take one test with a trailer, rather than having to pass a test without a trailer first
- allow the off-road manoeuvres part of the test to be assessed by the driver training industry
- allow car drivers to tow a trailer without having to take another test



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Your details

Please tell us in what capacity you are responding to the consultation.

RoSPA response

As a road safety organisation.

Please tell us about the size of your business.

RoSPA response

Medium 50 – 249 employees.

Have you encountered any problems in driver recruitment in the past 24 months?

RoSPA response

No, RoSPA is an accident prevent charity and does not recruit drivers.

Are there any other areas related to driving test rules and licensing arrangements which may act as a barrier and discourage people from considering professional lorry driving as a career choice?

RoSPA response

RoSPA is not in a position to comment in this scope, although we believe that outside of the scope of driving test rules and licensing arrangements, the recent decision to extend the temporary relaxation of drivers' hours rules may make the profession unattractive to existing and prospective drivers. This decision seemed to be for economic reasons to cover the lack of HGV drivers and is not in the interest of safety for the driver and other road users. This is unlikely to prove popular with drivers and their union representatives.



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Removing the current staging requirements for licence acquisition

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

RoSPA response

RoSPA strongly disagrees with this proposal. Although we understand the urgent need to recruit additional goods-vehicle drivers, we are concerned that the proposals could have a detrimental impact on road safety.

The skills required to drive a category C vehicle safely are far above what is expected to drive a category B vehicle and we believe that enabling drivers to learn to operate a significantly larger vehicle at the same time as learning to handle the complexities of a significantly sized trailer is too demanding.

Many driver training courses for category C, C1+E and C or D1, D1+E and D vehicles often take place on an intensive basis over a week or in some cases two weeks; therefore if only one training course and practical driving test was required to obtain a full licence with a trailer, there is the potential for drivers to ultimately receive half the amount of professional driver tuition they currently do. This is particularly concerning in the case of those intending to drive a category C+E vehicle due to the potential impact a collision could have with such a large vehicle and a relatively inexperienced driver.

Additionally, the current staging process may provide reassurance to both the driver and their employer that the driver has some experience of driving and manoeuvring a large vehicle on a public road and in operational settings outside of the test, before going on to apply for a C+E provisional licence and be tested in a heavier vehicle. Should these staging requirements be removed, drivers could take the test in a larger vehicle, before having been tested and gained more experience in a lighter vehicle.

This reduction in experience could have a negative effect on road safety, not only for the driver, but also for other road users. RoSPA would be interested to see if there is evidence that a driver who takes the C+E test as soon as possible after gaining a category C licence is no more likely to be involved in a collision than a driver who has more on-road experience driving a category C vehicle before going on to take the C+E test.

Although RoSPA cannot speak on behalf of operators, we question whether employers would be more confident if a driver had qualified via the existing staging route, gaining experience in a lighter vehicle before testing in a heavier vehicle. Should this be the case, we believe this proposal will not address the current issues with recruiting drivers.



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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?

RoSPA response

Although we strongly disagree with removing staging requirements, should the above proposals go ahead, RoSPA would accept that this proposal makes sense on the grounds of practicality.

As the paper states, the category C entitlement will need to be given at the same time as the C+E licence. Without this, the driver will be licensed to tow the larger C+E combination but would not be able to drive the C vehicle on its own. In practice, this would mean an articulated lorry driver would not be able to drive just the tractor unit, or a wagon and drag driver would not be able to drive just the rigid lorry without the trailer.

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

RoSPA response

We recognise that if these proposals were to go ahead, this would simplify the process for drivers to obtain their licence. It should also speed up the process as a driver will not have to take an additional test before qualifying as a C+E driver.

It would also make more tests available. As the paper states, some 14,000 drivers take C+E tests each year; by removing the requirement to first have to pass a C test this should make around 20,000 additional tests available.

However, RoSPA believes the potential risk to safety of the driver and other road users outweigh the potential cost and time savings associated with removing the staging process. We believe that before this consultation commenced, evidence should have been provided to show whether a driver who takes their C+E test as soon as possible after gaining their category C licence is more or less likely to be involved in an accident than a driver who has more on-road experience driving a category C vehicle before going on to take the C+E test.

RoSPA would also question whether the driver training industry has the resources available to facilitate a significant increase in C+E training, such as suitably qualified staff and appropriate vehicles, and the impact this would have on those currently only conducting category C driver training.

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?



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RoSPA response

RoSPA strongly agrees. Although it is not yet clear how much demand there would be for drivers who had gained their C+E entitlement to then take a category C test, we believe that this option would be beneficial. For example, some employers could be more confident if a driver has qualified by passing both the C and C+E test. It may also prove beneficial for those who are asked to accompany a learner driver, if the learner driver has chosen to take their category C test before their C+E test. It does not seem acceptable for a driver who has not taken their category C test to supervise and accompany a driver who will be taking the category C test.

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

RoSPA response

RoSPA is not in a position to comment.

As a prospective employer, do you agree or disagree that drivers should continue to demonstrate competence by taking a category C or D test before a C+E or D+E tests?

RoSPA response

RoSPA is not a prospective employer of drivers and is therefore not in a position to comment.

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

RoSPA response

RoSPA believes that it is vital that we maintain the professional standard of our vocational drivers ensuring the safety of all road users. We have significant concerns about the proposal to remove the current staging requirements for licence acquisition as this could have negative impacts on road safety.

If the proposals go ahead and future evidence shows an increase in road traffic collisions involving those who acquired a vocational licence in this manner, RoSPA would be keen to know if a strategy has been put in place to revert back to the current process and whether there would be additional requirements made, such as through Driver CPC, for those who gained their licence in this way.

Although we recognise the urgency of the driver shortage, safety must not be compromised for economic benefits.



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

RoSPA response

RoSPA is not in a position to comment.

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?

RoSPA response

RoSPA disagrees on the basis that if this proposal were to go ahead, qualified drivers could accompany and supervise a learner driver without necessarily having had experience of driving the vehicle or having taken the test. However, we do recognise that if the proposal to remove current staging requirements to licence acquisition goes ahead, there will most likely be fewer drivers who have taken their C and D test in future. This means that this proposal may need to be revisited.

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?

RoSPA response

RoSPA agrees with this proposal.



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Considering alternative arrangements for the conduct of the reversing manoeuvres

The current regulations require applicants for category C and D practical tests to demonstrate they can competently reverse the vehicle in a straight line and in an S-shaped curve and turn the vehicle to face the opposite way using forward and reverse gears and park it both forwards and in reverse. If the test candidate is taking a vehicle and trailer test they must also show they can uncouple the trailer and then recouple the trailer to the tractor unit.

For road safety reasons, these manoeuvres are demonstrated on an off-road area before the test candidate commences the on-road drive.

Currently, this element of the driving test is conducted by DVSA driving examiners, but the regulations could be adjusted to enable the authorisation of others to carry out these off-road elements of the test. These off-road elements could be defined as a separate part of the practical test and others authorised to conduct them (albeit DVSA examiners authorisation to carry out these elements of the test would remain so they too could continue to carry out these tests).

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?

RoSPA response

RoSPA strongly disagrees with this proposal. As the paper states, testing these manoeuvres separately to the other elements of the practical on-road test will free up examiner time to enable an additional on road test to be added to the daily test schedule for full time vocational driving examiners.

However, being able to perform the reversing manoeuvre and coupling exercise accurately is a critical part of operating the vehicle safely and we question whether standards will be reduced if it is not included as part of the driving test and is assessed by a third party. RoSPA believes that the DVSA should continue to assess the manoeuvre and although we recognise there is currently a high demand for driving tests, road safety for many years to come should not be compromised just to enable more tests to be conducted each day.

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



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RoSPA response

RoSPA believes that this could present a business opportunity to training organisations that currently own or have access to a suitable location to perform the manoeuvre, but it could affect individual driver training providers or smaller businesses without such access.

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

- Existing or new HGV trainers being authorised
- Only those trainers who are members of either of the two voluntary HGV training registers?
- Trainers who hold specific professional qualifications
- Other (please specify)

RoSPA response

RoSPA strongly believes that DVSA examiners are best qualified to assess the manoeuvres.

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

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

RoSPA response

Although we disagree that a third party should be authorised to assess the manoeuvres, if it were to go ahead RoSPA would want to see a fully regulated scheme. We need to have confidence that trainers are properly assessing candidates so that driving standards are maintained. Prospective employers will also need to have confidence that newly-qualified category C and C+E drivers can safely reverse into loading bays and other confined areas without damaging vehicles and other infrastructure.

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



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RoSPA response

As previously pointed out, being able to perform the reversing manoeuvre and coupling exercise accurately is a critical part of operating the vehicle safely and we question whether standards will be reduced if it not included as part of the driving test and is assessed by a third party.

RoSPA believes that the DVSA should continue to assess the manoeuvre and although we recognise there is currently a high demand for driving tests, road safety for many years to come should not be compromised just to enable more tests to be conducted each day.



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Allow car drivers to tow a trailer without the need for an additional test

To what extent do you agree with the proposal that car drivers should be allowed to tow a trailer without the need for passing a B+E test?

RoSPA response

RoSPA strongly disagrees with this proposal. Although we recognise that DVSA currently conducts 30,000 B+E tests a year, and removing the need for this would free up examiner time, we believe that this will have a negative impact on road safety. The skills required to couple and uncouple a trailer, perform reversing manoeuvres and tow a trailer on the road need to be taught and assessed to ensure the safety of all road users is not compromised.

Even if the DVSA were to encourage drivers to obtain professional training before first towing a car and trailer combination, this would not be mandatory, meaning that it is not possible to ensure that road safety standards are maintained.

How much, on average, does a B+E training course cost a driver?

RoSPA response

RoSPA is not in a position to comment.

What benefits or dis-benefits are there for a driver if they don't need to take a B+E test?

RoSPA response

The clear benefit to drivers is that there would be savings to be made, as they would not be required to take a B+E test. As the paper states, there would also be benefits for some businesses who use a car or van and trailer combination.

However, the potential negative impacts on road safety of drivers not taking a test or opting not to take training has dis-benefits for the driver and all other road users. We believe that this dis-benefit outweighs the benefits.



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Please explain how this will impact your business.

RoSPA response

RoSPA is not a training organisation and does not employ drivers who tow trailers, meaning there will be no impact on business.

Do you think drivers would continue to want to take some training, even if a test is not required?

RoSPA response

It is unclear whether drivers would want to continue to take some training if the test is no longer required. Clearly some drivers would wish to take training, as towing is very different to driving a car without a trailer, but we would imagine that for many drivers, an incentive may need to be considered, such as insurance discounts on completion of training.

Do you consider there to be any implications for the insurance industry?

RoSPA response

RoSPA is not in a position to comment.

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

RoSPA response

RoSPA believes that there would be concerns for road safety if this proposal goes ahead. Even if the DVSA were to encourage drivers to obtain professional training before first towing a car and trailer combination, this would not be mandatory, meaning that it is not possible to ensure that road safety standards are maintained. RoSPA is concerned that without training, drivers may be more likely to be involved in an accident when towing a vehicle.

Without a test requirement, there is no way of ensuring that drivers are competent in towing before they are able to tow a trailer. Government statistics show that so far this financial year, the pass rate for car and trailer tests is 70.1%¹, meaning that currently, almost one in three drivers do not pass, as they do not meet the requirements to

¹ Department for Transport and Driver and Vehicle Standards Agency (2021) 'Driving test statistics (DRT)'



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safely tow a trailer. Without a test, these drivers will be able to tow, even though their performance on test suggests they are not yet competent to do so.

The training and test to acquire a B+E licence involves not just a driving test, but also practicing and demonstrating safety manoeuvres, such as coupling and uncoupling safely and "show me, tell me" safety questions (checking brake fluid, indicators, horn and tyres; loading and securing a load and checking the overall security of vehicle and trailer). Without a test or training, we would be concerned that some drivers may not be competent in these areas before towing. The recently published [trailer safety report](#), and [#towsafe4freddie campaign](#) highlight the risks from improperly secured trailers.

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

<https://www.gov.uk/government/statistical-data-sets/driving-test-statistics-drt#car-driving-test-pass-rates-drt02>

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