



## Country case study on the implementation of directive 2003/59/EC United Kingdom

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### A. Baseline

Before the implementation of the Directive, professional drivers would be subject to training during their initial driving test and subsequently at their employer's discretion only. However, the amount of U.K legislation surrounding the driver's test has grown since the 1930's;

In February 1934, Licenses for lorry drivers were introduced under the Road Traffic Act, 1934. The licensing authority required the applicant to submit to a practical test of their ability. In early 1937, provisional licenses were introduced for truck drivers. These licenses were part of a bigger review of driver licensing and testing in 1967, when the Road Safety Act was introduced. Requirements for licensing and testing were further refined in 1969 when a new scheme was introduced for truck drivers; this had a 'knock-on' effect in 1970 when passenger vehicle drivers were subject to the same standards as truck drivers. Indeed, before the change it was vehicle inspectors who were required to carry out passenger driver testing. After the change in 1970, it was official examiners with an HGV qualification that held the responsibility for driver testing. This introduced a higher standard of testing and subsequently the standards of driving improved in both the HGV and passenger transport sectors.

In January 1997, a new written theory test for HGV drivers was introduced, along with a change in term from HGV (Heavy Goods Vehicle) to LGV (Large Goods Vehicle).

So this was the situation regarding driver testing, but of course the Directive is all about ongoing training and development. In this respect, the U.K transport industry has always had a responsibility to train drivers without input through legislation or government intervention. In fact, a large proportion of U.K truck drivers start work in the warehouse at a typically young age (say 16-19) and progress up to truck driving through corporate development and training. This could be considered as a type of apprenticeship, and while official apprenticeship schemes have been present in the U.K for many years now, there has been a general reluctance for companies to go down this path because of costs and time (it's linked to the National Vocational Qualification framework).

### B. Preparing for the Directives implementation

Initially there was a consultation between stakeholders and the government Department for Transport, in order to test the practicalities of introducing a system that had been worked on when the Directive was first discussed. These discussions involved a number of trade associations, private companies, academics and other government bodies, and following a period of due diligence the plan was created to set up an official body who would have responsibility for managing and accrediting periodic training standards. The issue around initial training was not considered a priority because the U.K opted for test only and it was considered that the majority of drivers would retain their 'grandfather' rights and would not need to undergo the initial test.

The organisation responsible for management and accreditation of periodic training is called JAUPT (Joint Approvals Unit for Periodic Training). All periodic training courses and centres must gain approval from JAUPT in order to operate commercially.

The organisation responsible for initial training and the recording of all periodic training modules is the DSA (Driving Standards Agency). They also have responsibility for managing all U.K driving licenses.

The reaction from U.K companies regarding the introduction of periodic training has been largely 'muted'. There is a general feeling that this training does not offer added value, as many companies were already conducting a similar type of training in-house and that the costs and time off the road does not provide a good return on the investment.

### C. Directive implemented

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There is a slight cross-over between periodic training and NVQ's (National Vocational Qualifications) in that a driver could count a 7 hour periodic training module towards his or her NVQ, provided that the course and training centre have been officially approved and that the training content meets with the syllabus for the NVQ. However, in reality this is not an ideal scenario as the NVQ requires the candidate to meet a certain standard whereas the periodic training module has no such limitation. This would likely result in complicated methodology towards gaining the full 35 hours periodic training.

One of the main challenges is the limitation placed on course length. The vast majority of driver CPC modules are 7 hours in length, and while it is possible to split the module into two 3.5 hour sessions it is not hugely beneficial because the 2<sup>nd</sup> part of the module must be taken within 24 hours of the 1<sup>st</sup> part of the module. If this time limit was not in force, then it is entirely likely that more periodic training would be delivered and the chances of meeting the deadline for completion of periodic training would be improved.

However, when the Directive came into force there was not much publicity here in the U.K, and that had the effect of drivers becoming aware of the Directive 3 or 4 months after its introduction. It seems as though the U.K transport industry has not, in the main, embraced the concept of periodic training willingly.

The U.K industry is fortunate in that we have a vast number of periodic training modules to choose from, and the limits imposed on subject matter by other EU member states does not apply here.

We have a sector skills council called 'Skills for Logistics', who promote the U.K logistics industry through increased training, apprenticeships, awareness campaigns and funding streams. While they have no direct responsibility for enforcing or implementing the Directive, they are monitoring it closely as it will undoubtedly have an effect on driver performance and driver shortages over the longer term.

The responsibility for enforcing the requirements of the Directive rest with the police and VOSA, and the fines are steep. However, as the U.K will issue a driver card only on completion of the 35 hours periodic training the enforcement won't be widespread until the deadline for periodic training completion has passed, as most transport operators will continue to wait until 2014.

### D. Exams

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The exam for the initial qualification is only relevant to new drivers, and it is widely anticipated that the test will be taken at the same time as the vocational driving licence. The examinations will be administered and monitored by the Driving Standards Agency (DSA) under normal exam conditions.

## E. Periodic training

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The flexibility of the U.K system means that we now have over 1400 approved courses and over 800 approved training centres. Clearly many of these courses are a variation on the same theme, but a driver is not obliged to follow the subjects detailed in the Directive (unlike the initial training whereby the entire syllabus must be studied) and a company can choose to place their drivers on the most appropriate course in line with corporate needs. This would typically be based upon fuel efficiency or defensive driving, so as to reduce costs associated with fuel consumption and vehicle repairs.

## F. Execution of the training by public and private providers

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Accredited businesses, whether they are an individual with a small business, an SME or a large, established training provider, are authorised to deliver initial and/or periodic training. As long as they meet the criteria set by JAUPT for both the training course and the training centre then they can continue to deliver this training.

When a potential training provider wants to start delivering periodic training, they must undergo a Quality Assurance Audit delivered by JAUPT. Each course must be re-accredited once every 12 months, while the centre must continue to show that it meets with the requirements for a training centre until it reaches 5 years, at which point it must be re-assessed for centre approval. The following link provides information about course and centre approval; <http://www.drivercpc.org/en/faqs/centres-courses/>

## G. Reflection on the implementation

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While the implementation of the Directive is being monitored in terms of delegate numbers and quality, in reality there are very few actions being taken to improve uptake or effectiveness. It is partly due to the training standards that have been in place for a number of years already. While it will undoubtedly have an effect on driver performance over the longer term, there is currently no extensive research on the effectiveness of the periodic training.

The Directive is not expected to have a huge effect on driver shortages, in part because it's too early to see any real difference but more importantly because the 'grandfather rights' apply to the majority of the U.K truck drivers and it will only address the driver shortage through the initial test at an earlier age.

There is also a question mark over whether it would make a difference to driver's employability; a driver's biggest asset is considered to be his or her experience and the class of vehicle that they are entitled to drive.

## H. Competition and European context

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The competition will always be limited as the biggest problem with periodic training is the fact that a number of EU countries refuse to recognise part-periodic training that has been completed in another country. Also, the Directive it is down to interpretation, which has given rise to differences across the EU. The ambition to improve driving standards across Europe will always be limited when you have different interpretations of the Directive, so I don't believe it is a level playing field.

Most U.K stakeholders believe that the Directive will bring about an improvement in standards, especially with smaller companies who rarely have training as a priority. However, there is still concern that the demand for periodic training in 2014 will outweigh the capacity of approved centres and training instructors.

## I. Prospects

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It is still too early to say what the U.K government will do to address the implementation of the Directive over the longer term. Many industry experts believe that the transport and logistics sector will be left to manage itself in this respect.

There appears to be no slowing down on the amount of approved courses and training centres, which of course will continue to provide huge choice for the driver's company and promote competition between training providers. Only when the effectiveness of periodic training can be examined will we understand whether changes will be made; this detailed examination is unlikely to be conducted before 2014.

For further information on the project please consult:

[www.project-profdrv.eu](http://www.project-profdrv.eu)

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