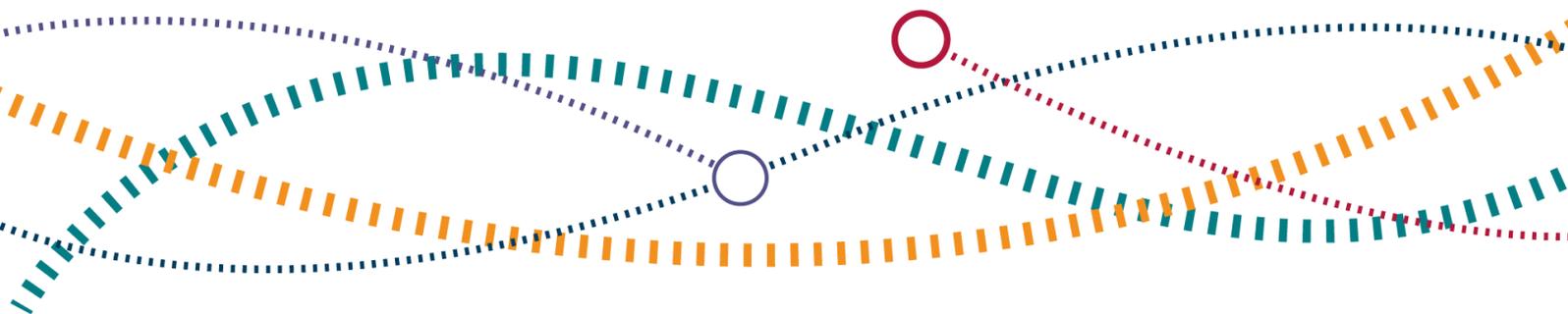




2023 Post Implementation Review on the Train Driving Licences and Certificates Regulations 2010

Consultation Findings Report



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Introduction

The Train Driving Licences and Certificates Regulations 2010 (TDLCR) are subject to a post implementation review (PIR) every 5 years to assess whether the regulations remain fit for purpose and are achieving their original objectives. The final PIR report was published by DfT on 19 May 2023 and is available [here](#).

To inform the review, the Office of Rail and Road (ORR) carried out a survey of stakeholders on behalf of the Department for Transport (DfT) during 2022. That on-line survey ran between 10 May and 6 July 2022 and was available for anyone to complete on the Consultations page of the ORR website. We also sent wrote directly to a group of 318 industry stakeholders who are involved in TDLCR inviting them to complete the survey.

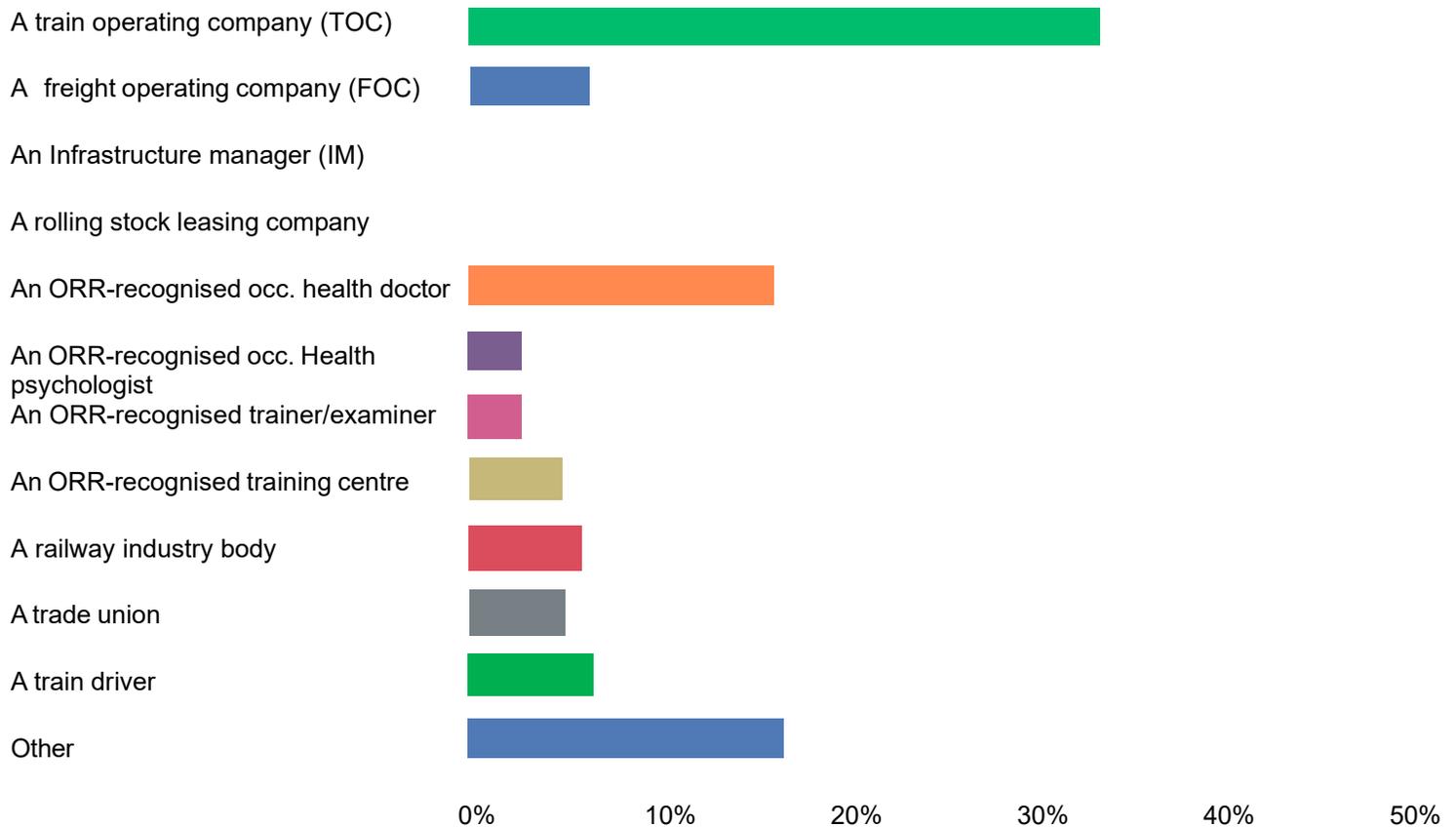
This Consultation Findings report does not provide any further comment on the regulations, or analysis of the survey responses to that found in the final PIR report. It is purely a reference document containing the responses we received to the on-line survey.

The report is split into three parts:

- **Annex 1** illustrates the answers provided for each question asked in the survey. We provide a visual chart and accompanying data table for each question;
- **Annex 2** is a table showing the free-text comments which respondents were able to give to most of the questions in order to explain their answers;
- **Annex 3** contains explanatory notes relevant to a small number of survey questions and responses.

Annex 1 - Consultation Survey Answers

Q2 Are you responding as...(please tick all that apply)

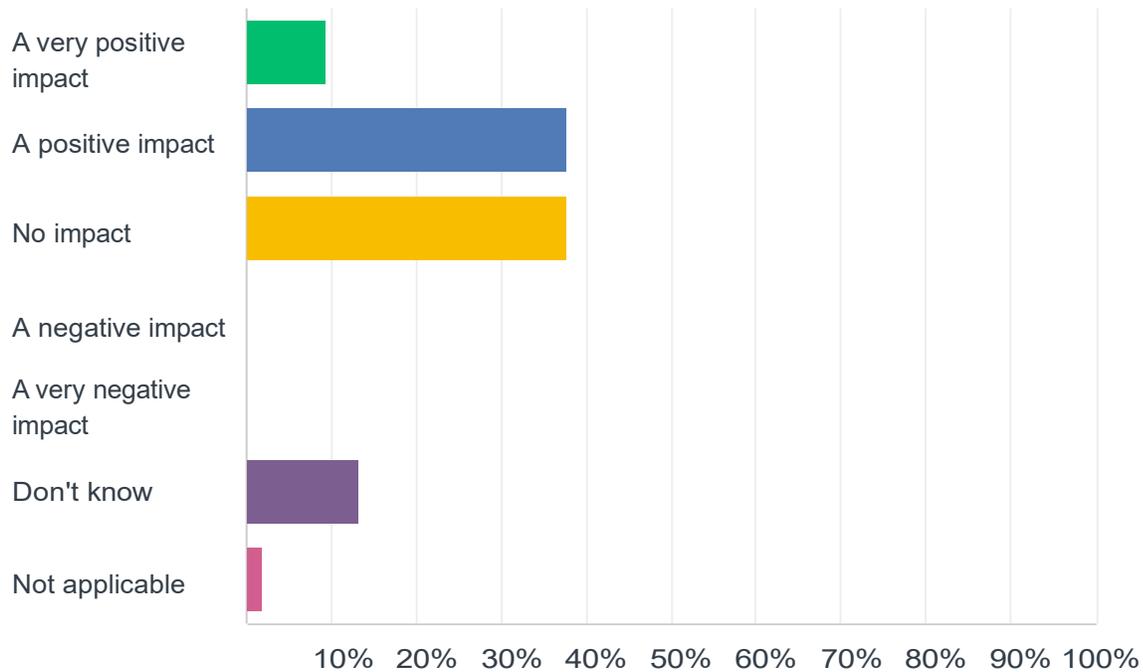


ANSWER CHOICES	Percentage	No. of responses
A train operating company ('TOC')	31.6%	19
A freight operating company ('FOC')	6.6%	4
A railway Infrastructure Manager ('IM')	0%	0
A rolling stock leasing company ('ROSCO')	0%	0
An ORR-recognised occupational health doctor	15%	9
An ORR-recognised occupational health psychologist	3.3%	2
An ORR-recognised trainer/examiner	3.3%	2
An ORR-recognised training centre	5%	3
A railway industry body	6.6%	4
A trade union	5%	3
A train driver	6.6%	4
Other (please specify)	16.6%	10

Q3 If you are responding as a TOC, FOC, IM or ROSCO, how many licenced drivers do you employ?

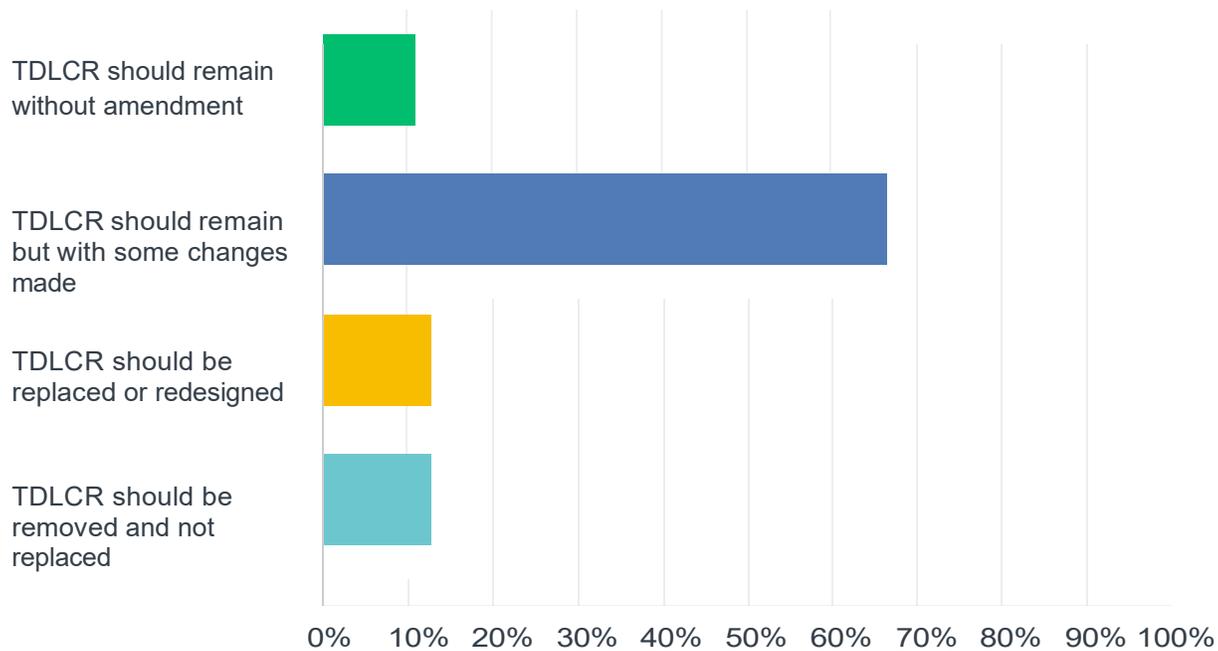
Respondent (anonymised)	Number of train drivers
A FOC	19
A TOC	1950
A TOC	595
A TOC	2400
A TOC	80
A TOC	719
A FOC	30
A TOC	55
A TOC	20
A TOC	49
A TOC	630
A TOC	255
A TOC	625
A TOC	320
A TOC	1673
A TOC	800
A FOC	800
A TOC	475

Q4 Overall, in your view, what impact has TDLCR had on the safety of the mainline railway?



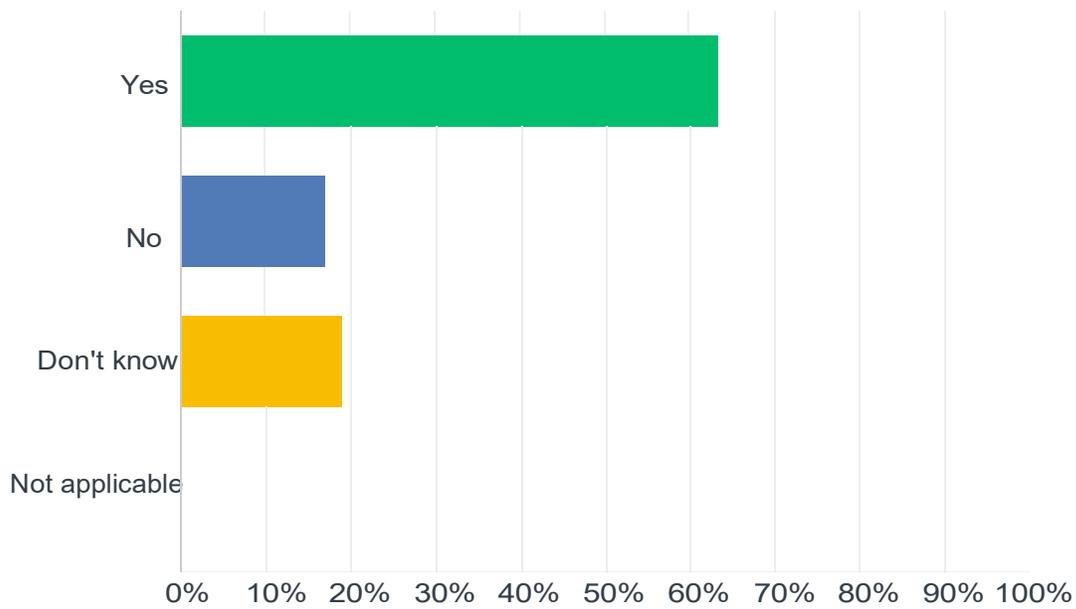
ANSWER CHOICES	Percentage	No. of responses
A very positive impact	9.43%	5
A positive impact	37.74%	20
No impact	37.74%	20
A negative impact	0.00%	0
A very negative impact	0.00%	0
Don't know	13.21%	7
Not applicable	1.89%	1

Q5 Which of the following do you think should apply to TDLCR?



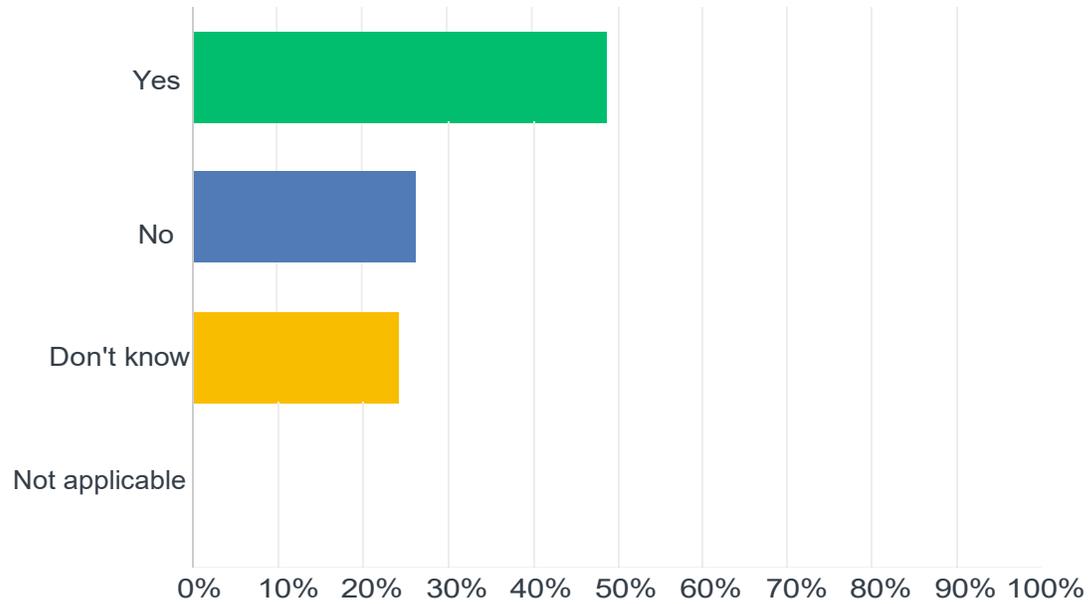
ANSWER CHOICES	RESPONSES
TDLCR should remain without amendment	11.11% 6
TDLCR should remain, but with some changes made	66.67% 36
TDLCR should be replaced or redesigned	12.96% 7
TDLCR should be removed and not replaced	12.96% 7

Q6 Do you think TDLCR has brought about benefits?



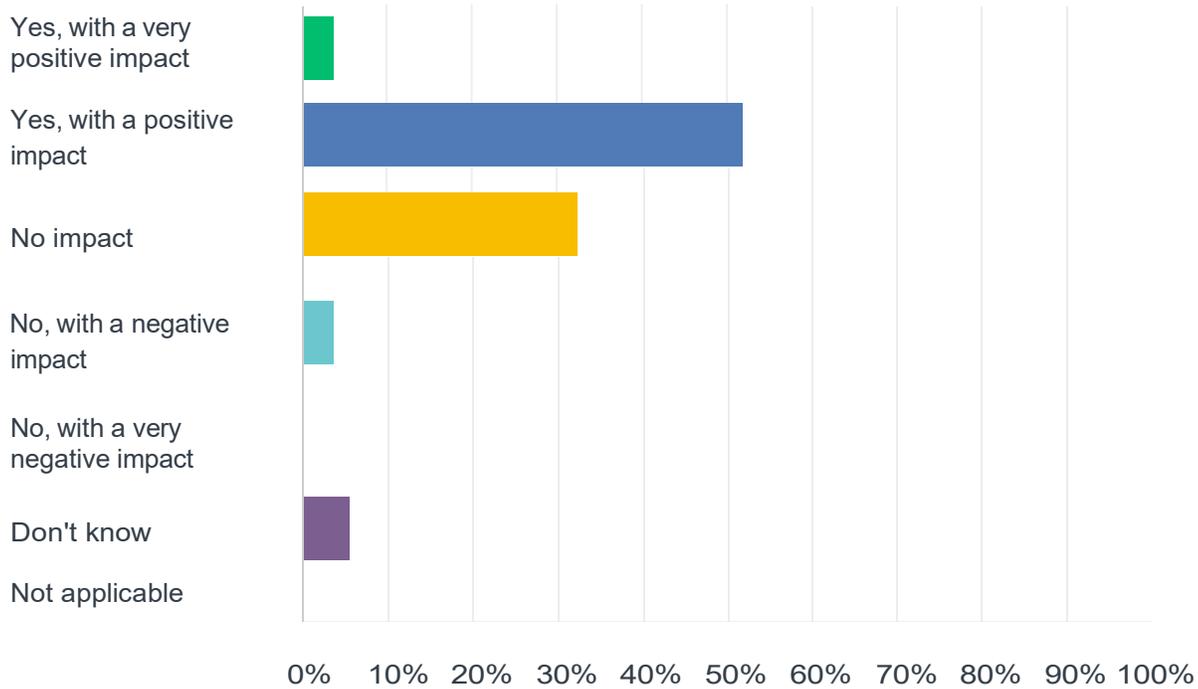
ANSWER CHOICES	Percentage	No. of responses
Yes	63.46%	33
No	17.31%	9
Don't know	19.23%	10
Not applicable	0.00%	0

Q7 Do you think TDLCR has brought about disbenefits?



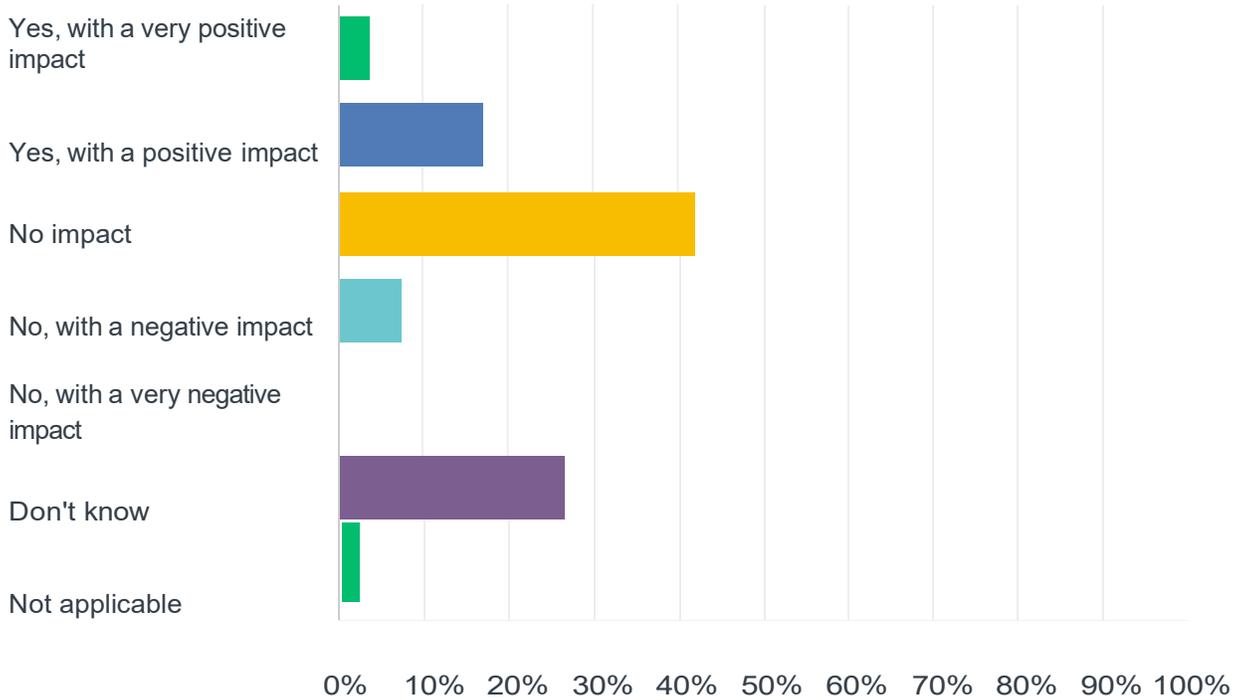
ANSWER CHOICES	Percentage	No. of responses
Yes	49.06%	26
No	26.42%	14
Don't know	24.53%	13
Not applicable	0.00%	0

Q8) Overall, do you think that TDLCR is achieving its aim of introducing commons standards for train drivers?



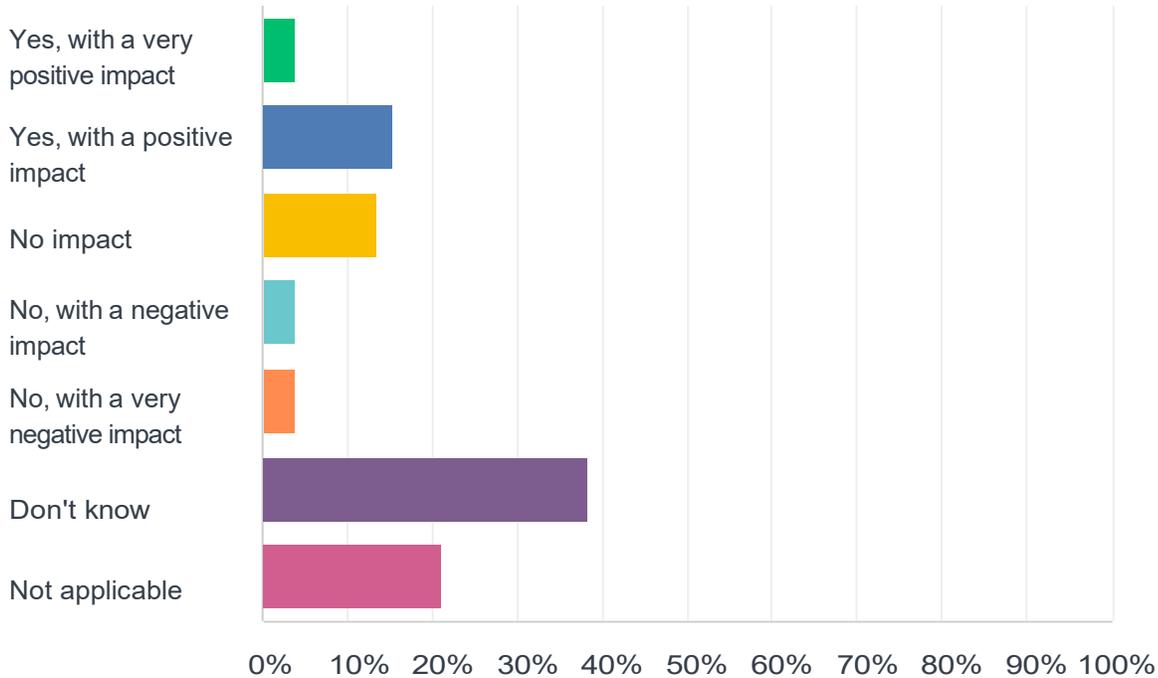
ANSWER CHOICES	Percentage	No. of Responses
Yes, with a very positive impact	3.85%	2
Yes, with a positive impact	51.92%	27
No impact	32.69%	17
No, with a negative impact	3.85%	2
No, with a very negative impact	0.00%	0
Don't know	5.77%	3
Not applicable	1.92%	1

Q9 Overall, do you think that TDLCR is achieving its aim of creating a more flexible labour market for train drivers?



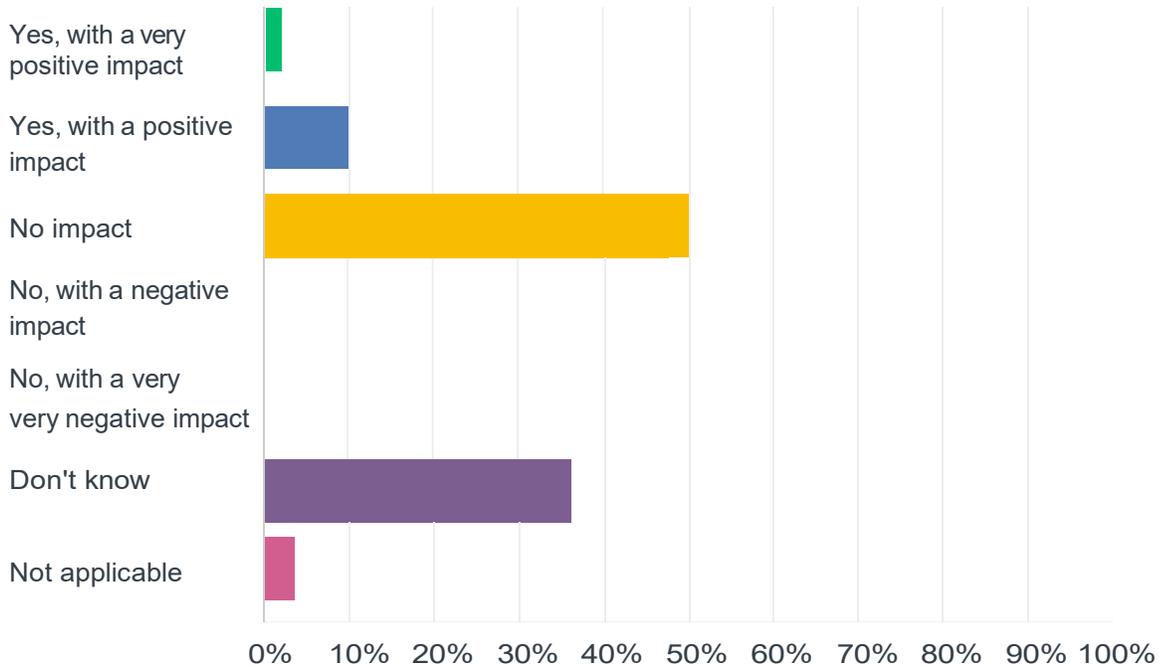
ANSWER CHOICES	Percentage	No. of Responses
Yes, with a very positive impact	3.85%	2
Yes, with a positive impact	17.31%	9
No impact	42.31%	22
No, with a negative impact	7.69%	4
No, with a very negative impact	0.00%	0
Don't know	26.92%	14
Not applicable	1.92%	1

Q10 Overall, do you think that TDLCR is achieving its aim of making it easier for cross border rail services to operate (including the changes in place after 31 January 2022)?



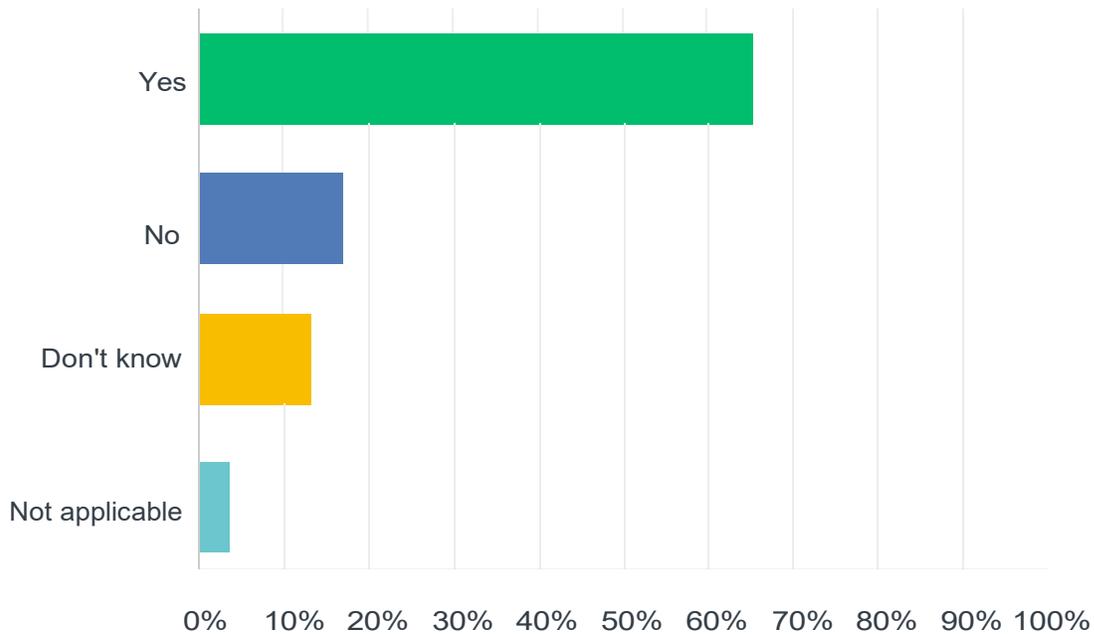
ANSWER CHOICES	Percentage	No. of Responses
Yes, with a very positive impact	3.85%	2
Yes, with a positive impact	15.38%	8
No impact	13.46%	7
No, with a negative impact	3.85%	2
No, with a very negative impact	3.85%	2
Don't know	38.46%	20
Not applicable	21.15%	11

Q11 Overall, do you think that TDLCR is achieving its aim of increasing public confidence in the rail system through the statutory licensing of train drivers?



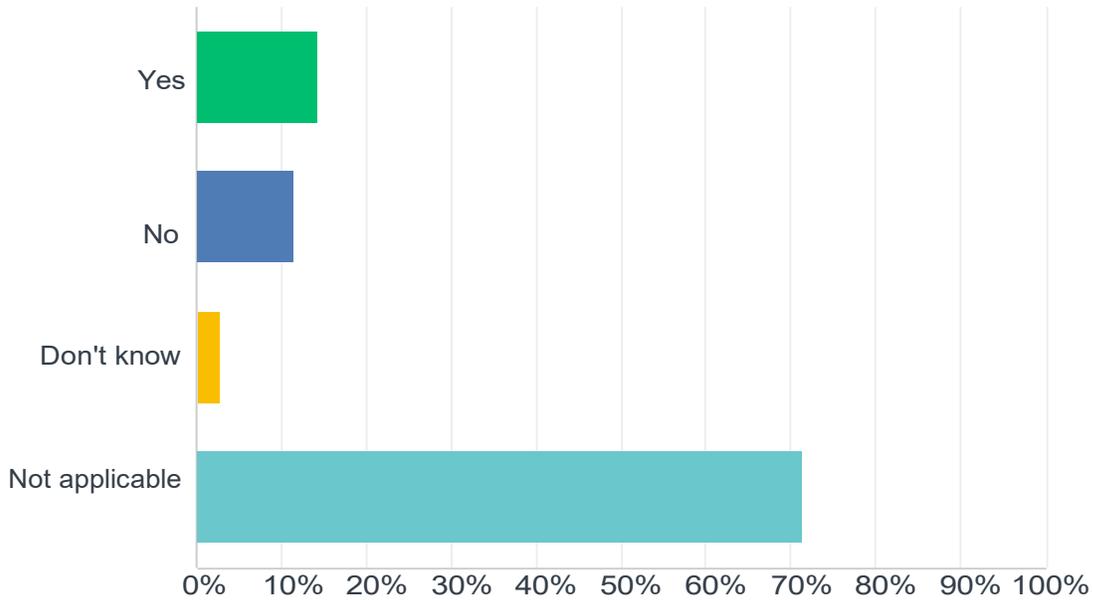
ANSWER CHOICES	Percentage	No. of responses
Yes, with a very positive impact	1.92%	1
Yes, with a positive impact	9.62%	5
No impact	48.08%	25
No, with a negative impact	0.00%	0
No, with a very negative impact	0.00%	0
Not applicable	3.85%	2
Don't know	36.54%	19

Q12 Are there aspects of TDLCR which would benefit from new or amended industry standards to assist with compliance? (for example, the RSSB Railway Industry Standards ('RIS') which cover topics such as medical fitness requirements, amongst others)



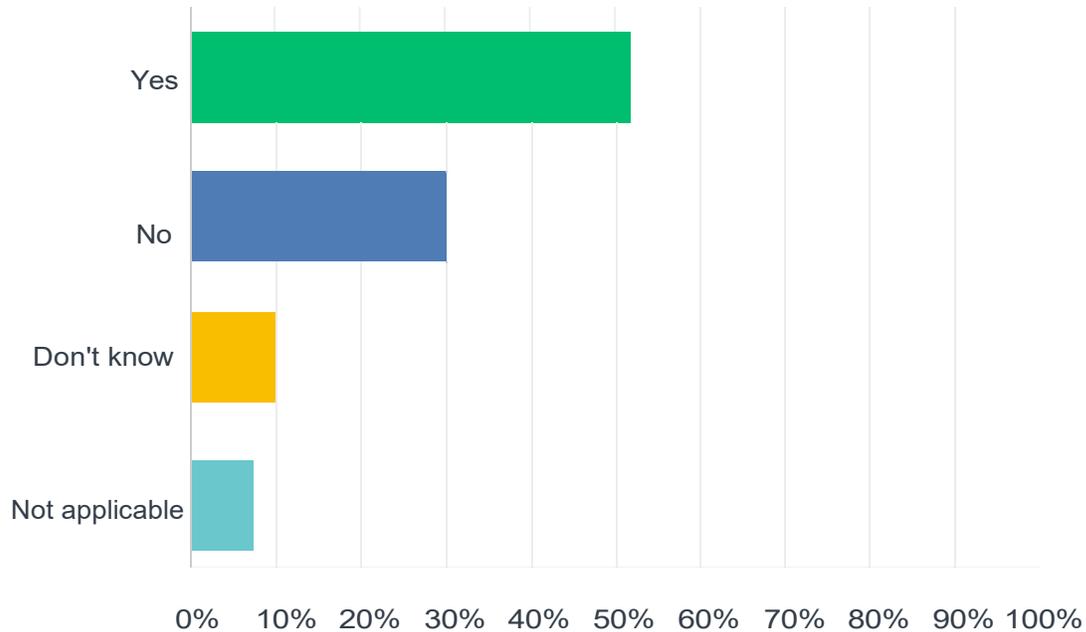
ANSWER CHOICES	Percentage	No. of Responses
Yes	65.38%	34
No	17.31%	9
Don't know	13.46%	7
Not applicable	3.85%	2

Q13 [only complete this question if you are an organisation with under 50 employees] Do you think that TDLCR has had a disproportionate impact on your business?



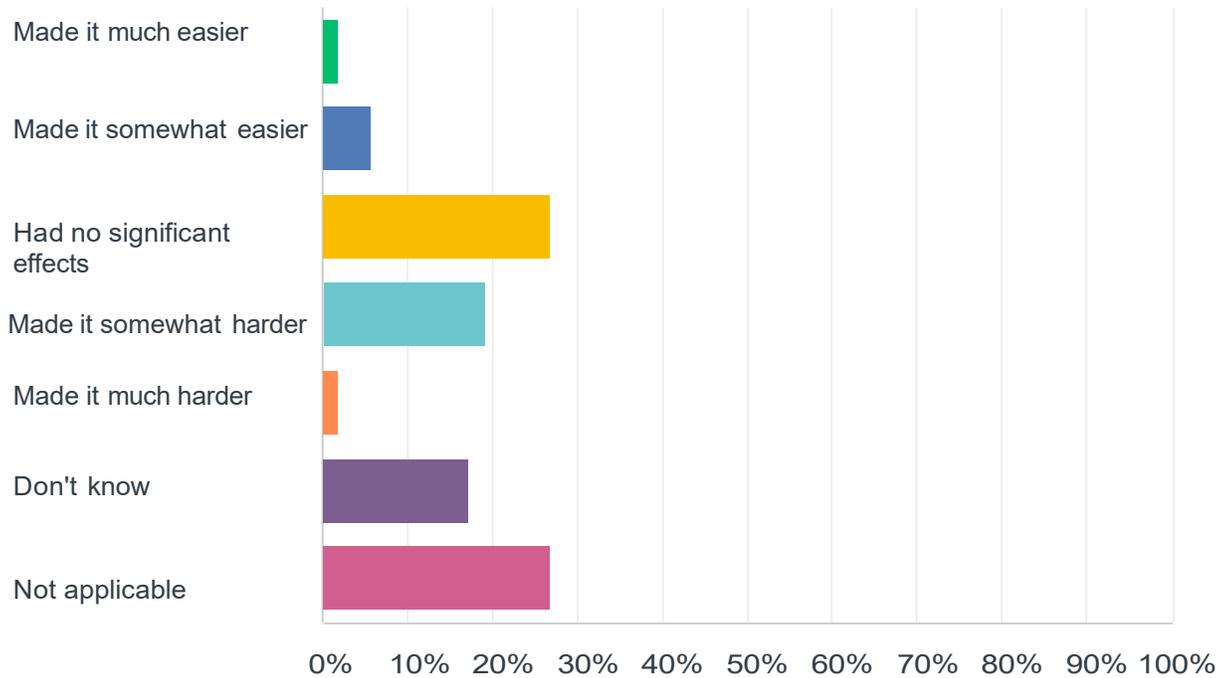
ANSWER CHOICES	Percentage	No. of Responses
Yes	14.29%	5
No	11.43%	4
Don't know	2.86%	1
Not applicable	71.43%	25

Q14 TDLCR does not cover non-mainline operations, such as London Underground. Do you think that non-mainline operations should be covered by the regulations?



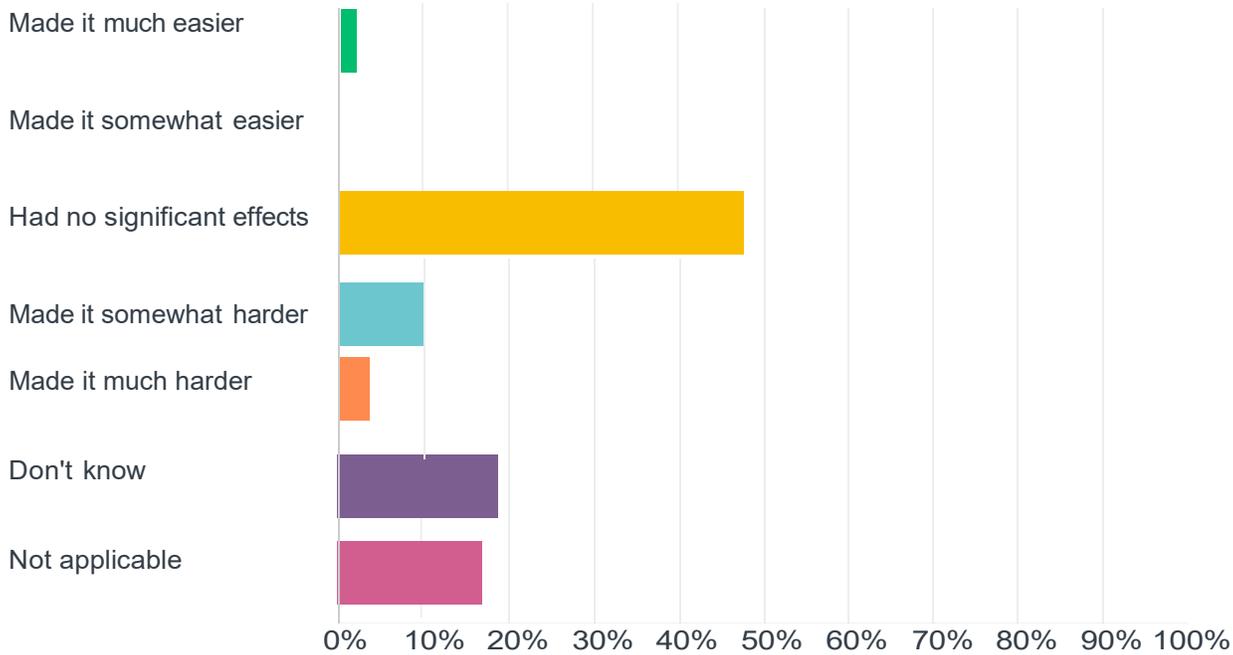
ANSWER CHOICES	Percentage	No. of Responses
Yes	51.92%	27
No	30.77%	16
Don't know	9.62%	5
Not applicable	7.69%	4

Q15 Overall, how has the full implementation of TDLCR affected your recruitment of new train drivers?



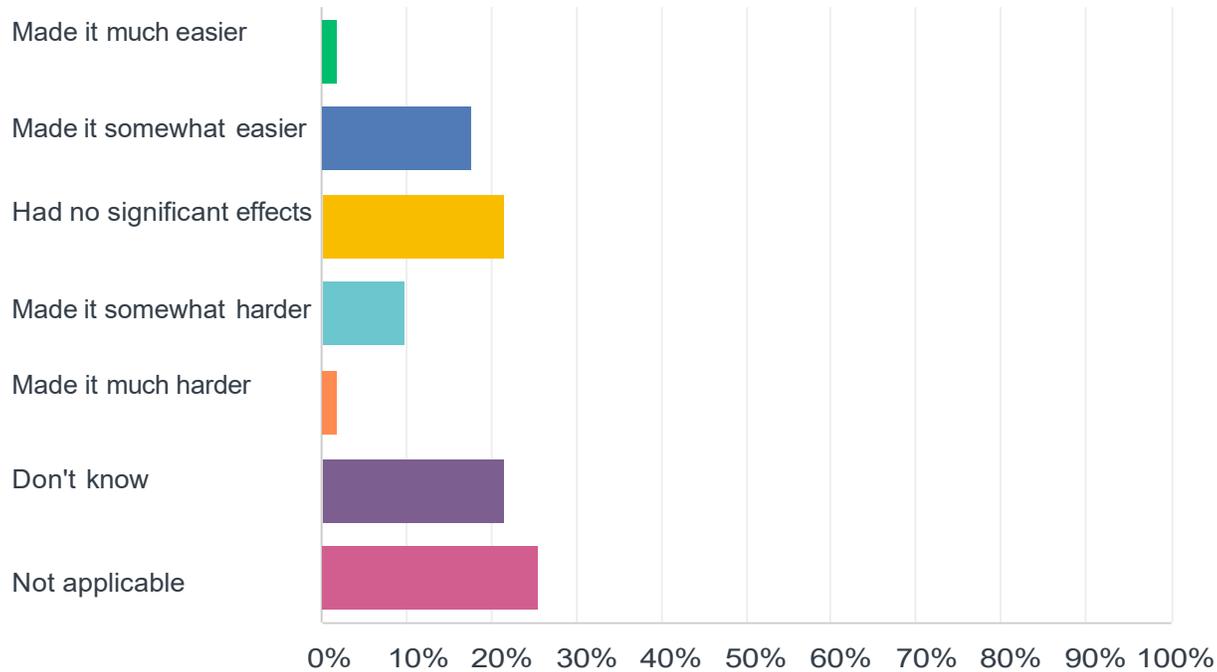
ANSWER CHOICES	Percentage	No. of Responses
Made it much easier	1.92%	1
Made it somewhat easier	5.77%	3
Had no significant effects	26.92%	14
Made it somewhat harder	19.23%	10
Made it much harder	1.92%	1
Don't know	17.31%	9
Not applicable	26.92%	14

Q16 How has the full implementation of TDLCR affected your retention of train drivers?



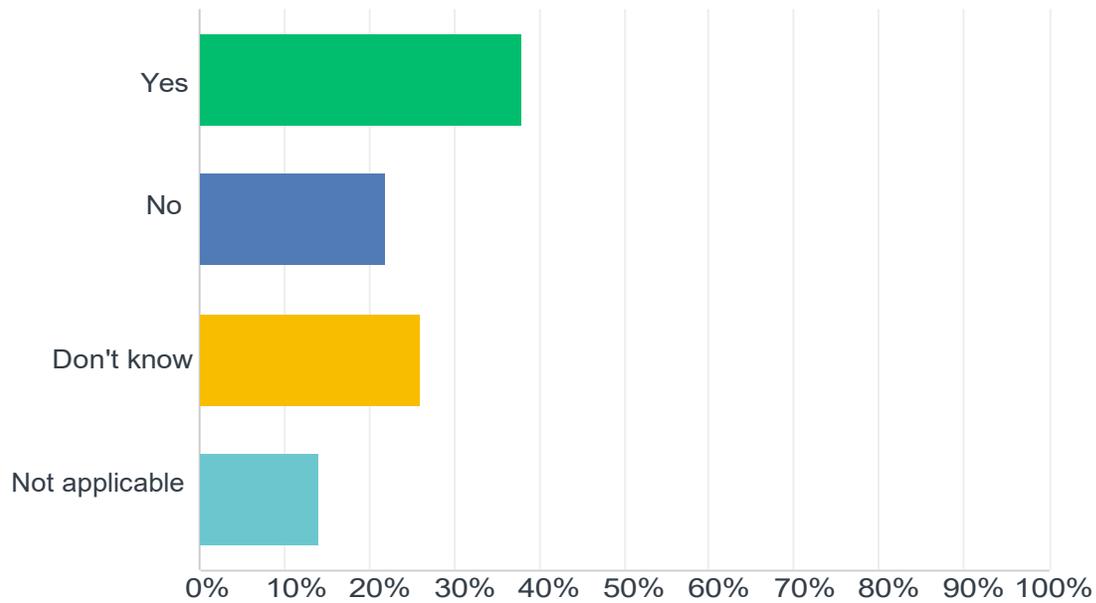
ANSWER CHOICES	Percentage	No. of Responses
Made it much easier	1.92%	1
Made it somewhat easier	0.00%	0
Had no significant effects	48.08%	25
Made it somewhat harder	9.62%	5
Made it much harder	3.85%	2
Don't know	19.23%	10
Not Applicable	17.30%	9

Q17 How has TDLCR affected your recruitment of train drivers from other operators?



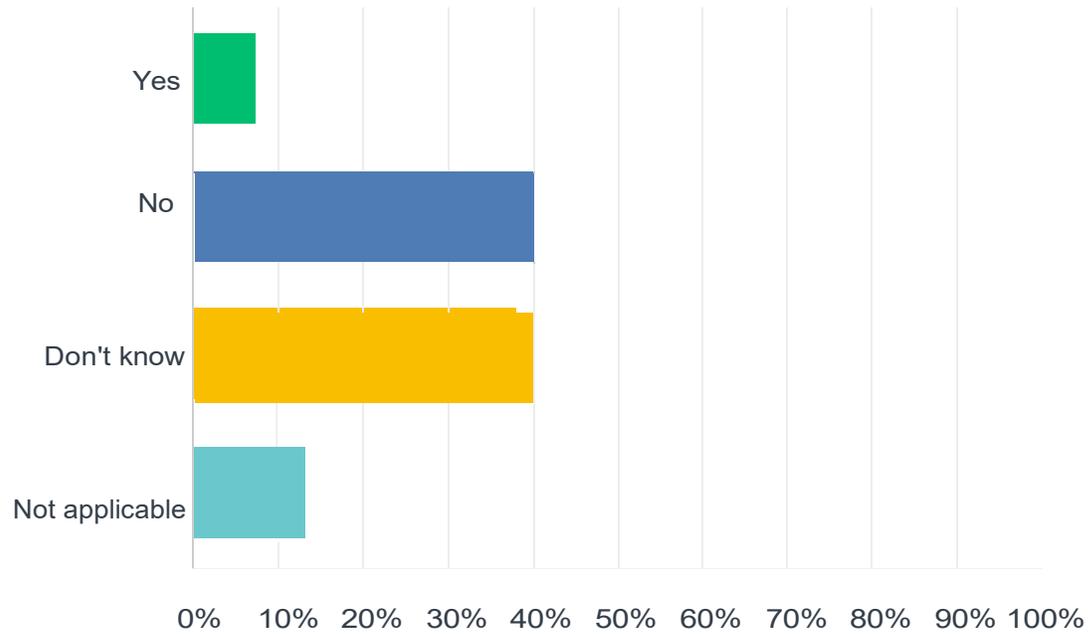
ANSWER CHOICES	Percentage	No. of Responses
Made it much easier	1.96%	1
Made it somewhat easier	17.65%	9
Had no significant effects	21.57%	11
Made it somewhat harder	9.80%	5
Made it much harder	1.96%	1
Don't know	21.57%	11
Not applicable	25.49%	13

Q18 Are the training and examination requirements of TDLCR effective?



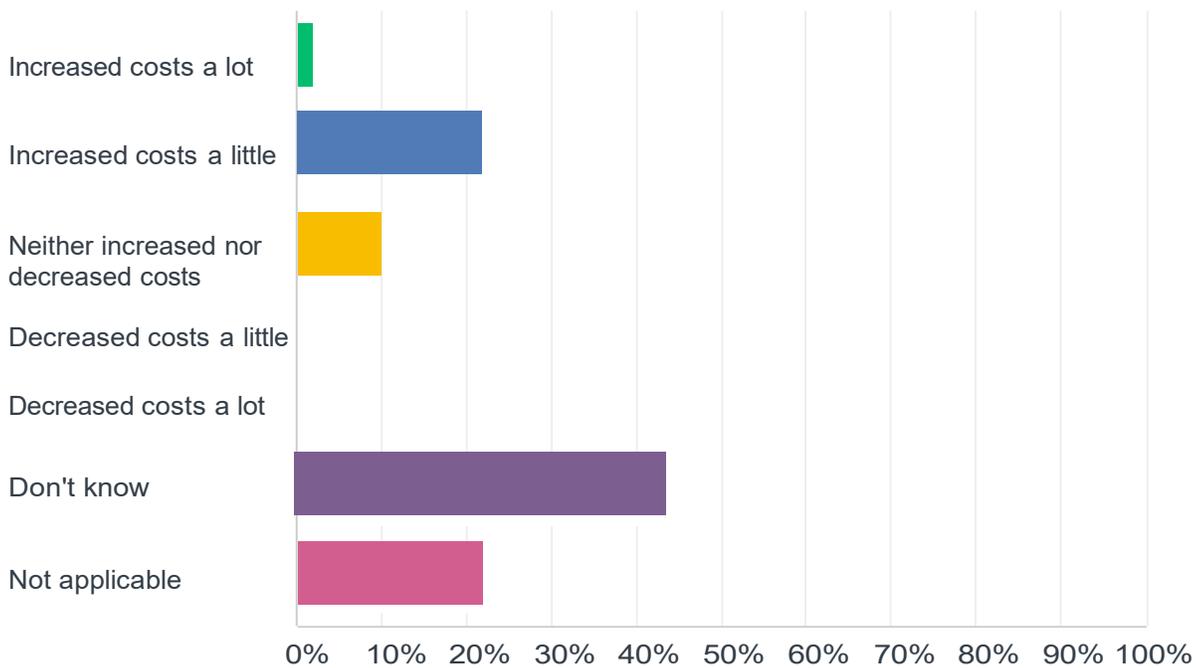
ANSWER CHOICES	Percentage	No. of Responses
Yes	38.00%	19
No	22.00%	11
Don't know	26.00%	13
Not applicable	14.00%	7

Q19 Has TDLCR had any effects on the market for train drivers?



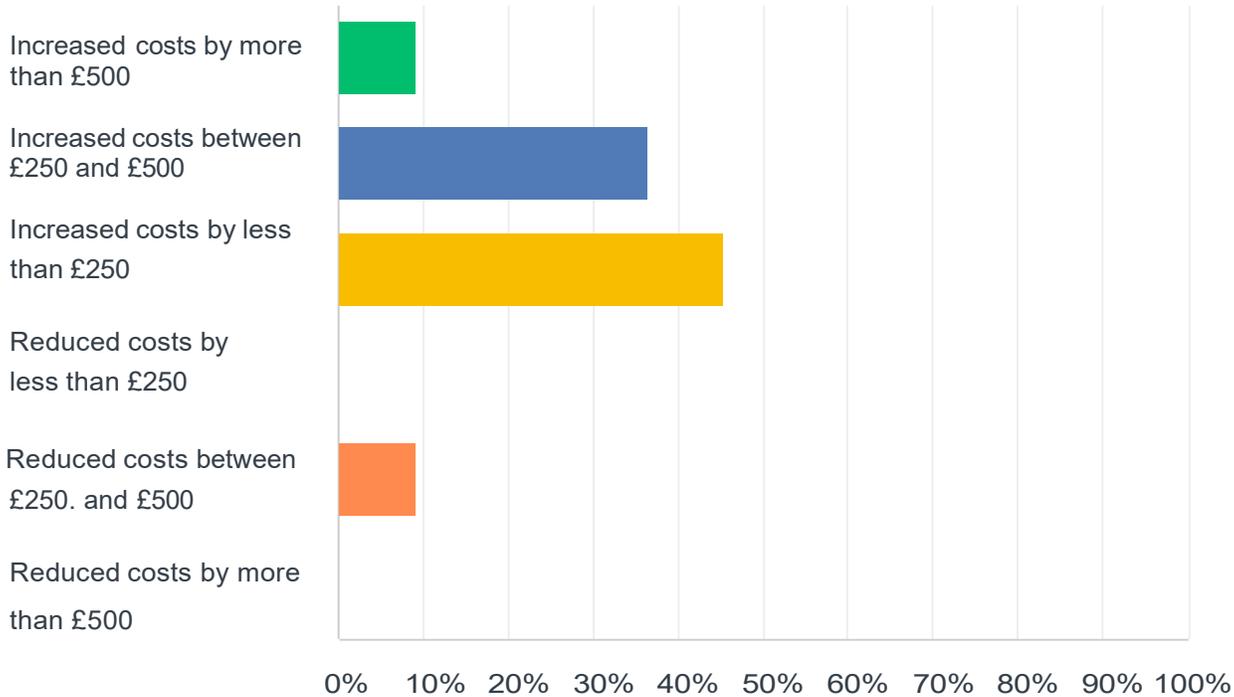
ANSWER CHOICES	Percentage	No. of Responses
Yes	7.69%	4
No	40.38%	21
Don't know	38.46%	20
Not applicable	13.46%	7

Q20 What impact, if any, has TLDCR had on the costs of recruiting and training new entrants to be train drivers?



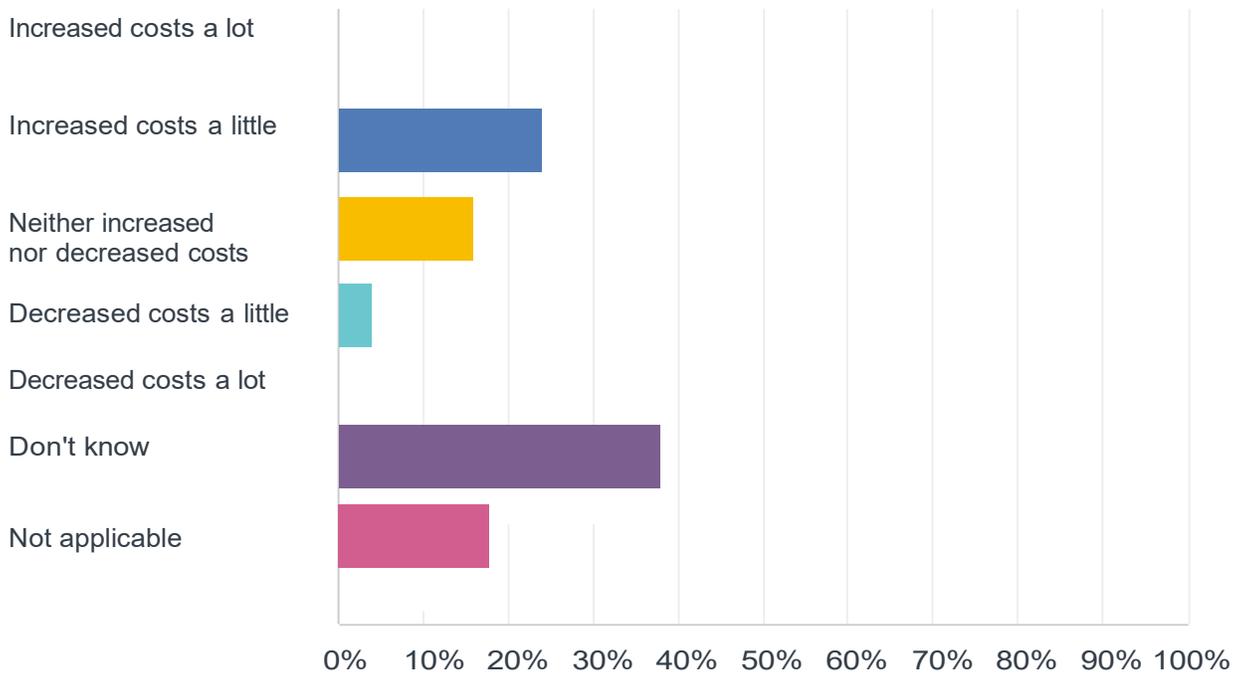
ANSWER CHOICES	Percentage	No. of Responses
Increased costs a lot	2.00%	1
Increased costs a little	22.00%	11
Neither increased nor decreased costs	10.00%	5
Decreased costs a little	0.00%	0
Decreased costs a lot	0.00%	0
Don't know	44.00%	22
Not applicable	22.00%	11

Q21 If you believe that TDLCR has had an impact on recruitment and training costs for new entrant drivers then please estimate the average cost per train driver



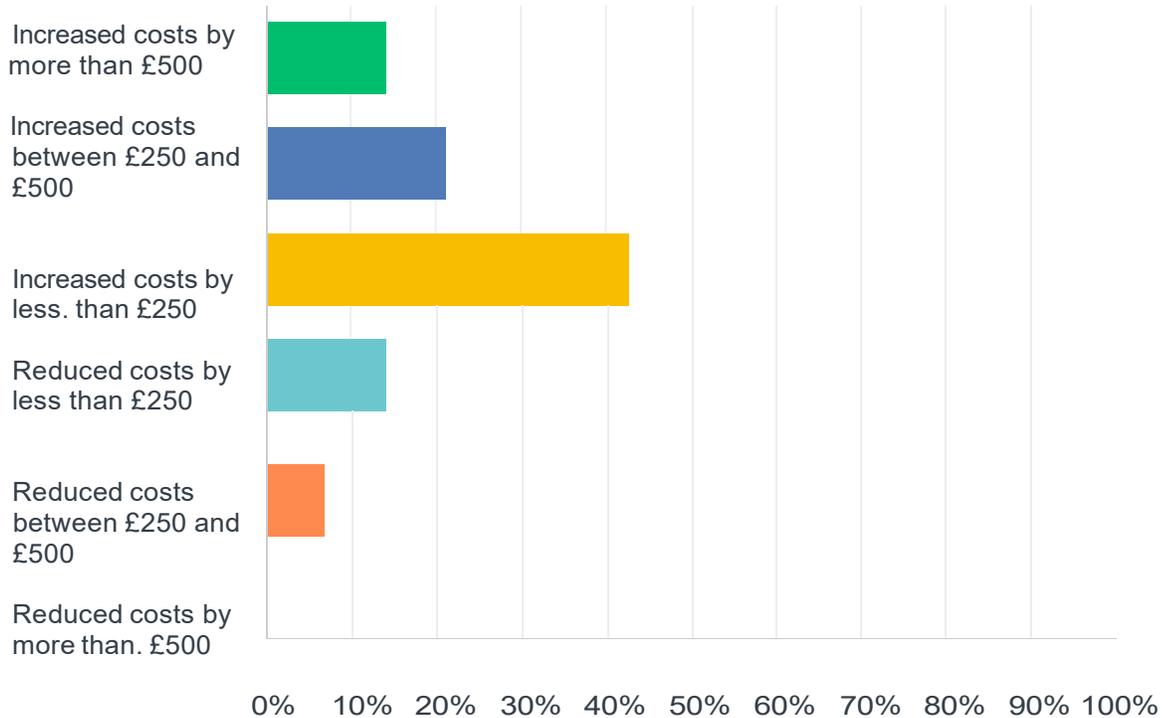
ANSWER CHOICES	RESPONSES	
Increased costs by more than £500 (please specify...)	9.09%	1
Increased costs between £250 and £500	36.36%	4
Increased costs by less than £250	45.45%	5
Reduced costs by less than £250	0.00%	0
Reduced costs between £250 and £500	9.09%	1
Reduced costs by more than £500 (please specify...)	0.00%	0

Q22 What impact, if any, has TLDCR had on the costs of recruiting and training existing train drivers?



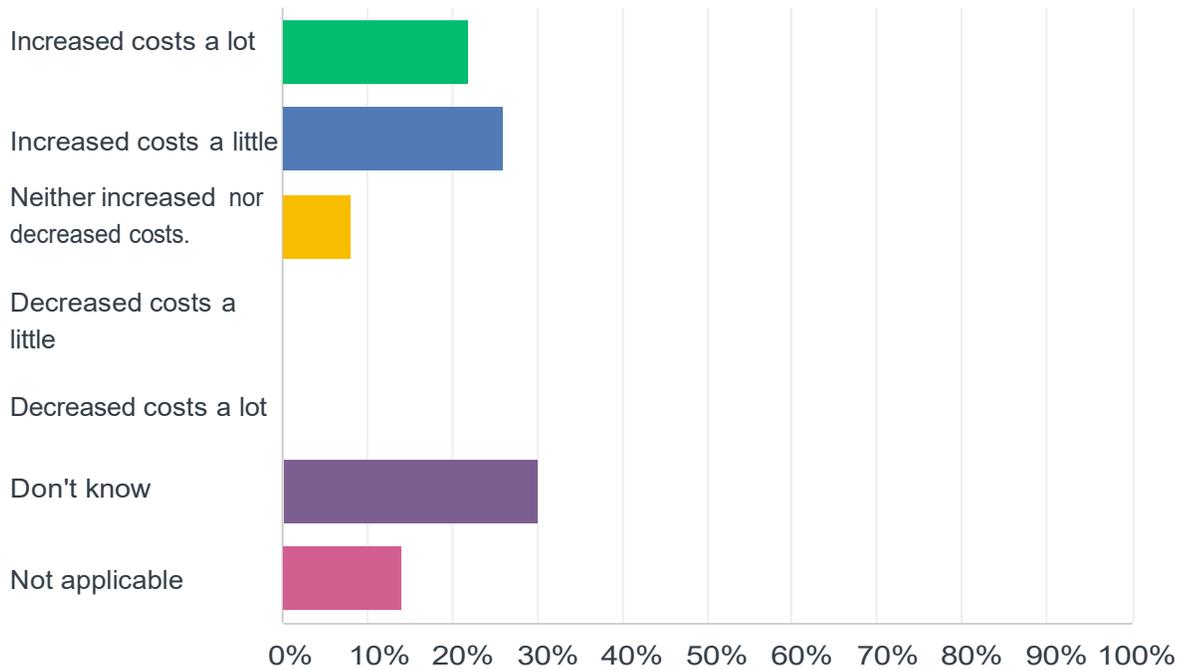
ANSWER CHOICES	Percentage	No. of Responses
Increased costs a lot	0.00%	0
Increased costs a little	24.00%	12
Neither increased nor decreased costs	16.00%	8
Decreased costs a little	4.00%	2
Decreased costs a lot	0.00%	0
Don't know	38.00%	19
Not applicable	18.00%	9

Q23 If you believe that TDLCR has had an impact on recruitment and training costs for existing drivers then please estimate the average cost per train driver



ANSWER CHOICES	Percentage	No. of responses
Increased costs by more than £500 (please specify...)	14.29%	2
Increased costs between £250 and £500	21.43%	3
Increased costs by less than £250	42.86%	6
Reduced costs by less than £250	14.29%	2
Reduced costs between £250 and £500	7.14%	1
Reduced costs by more than £500 (please specify...)	0.00%	0

Q24 Has maintaining compliance with TDLCR...

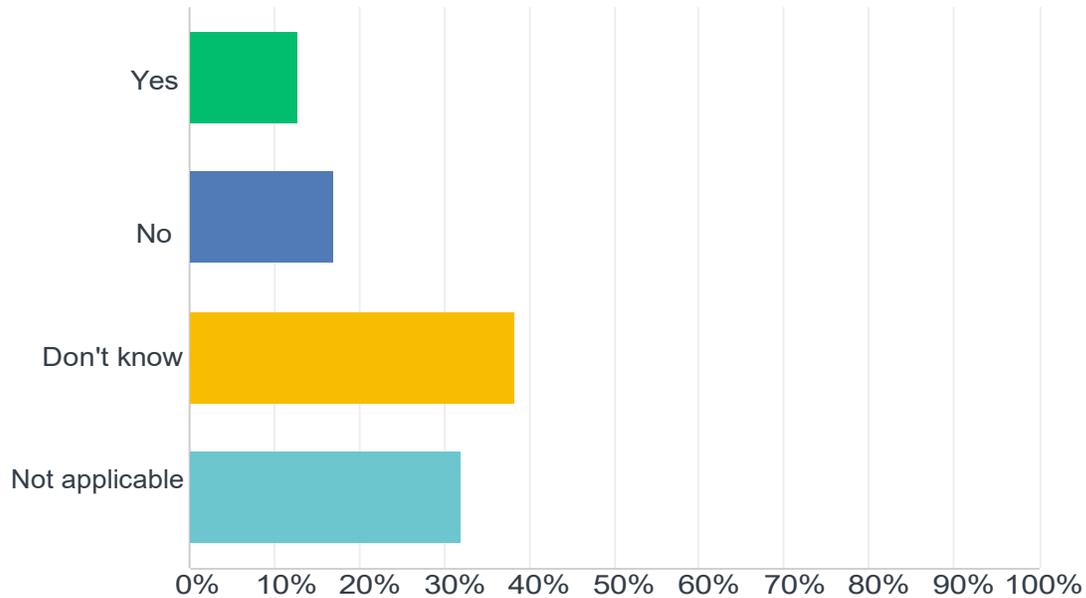


ANSWER CHOICES	Percentage	No. of Responses
Increased costs a lot	22.00%	11
Increased costs a little	26.00%	13
Neither increased nor decreased costs	8.00%	4
Decreased costs a little	0.00%	0
Decreased costs a lot	0.00%	0
Don't know	30.00%	15
Not applicable	14.00%	7

Q25 Please estimate the total annual cost to your organisation for complying with TDLCR (and explain your answer)

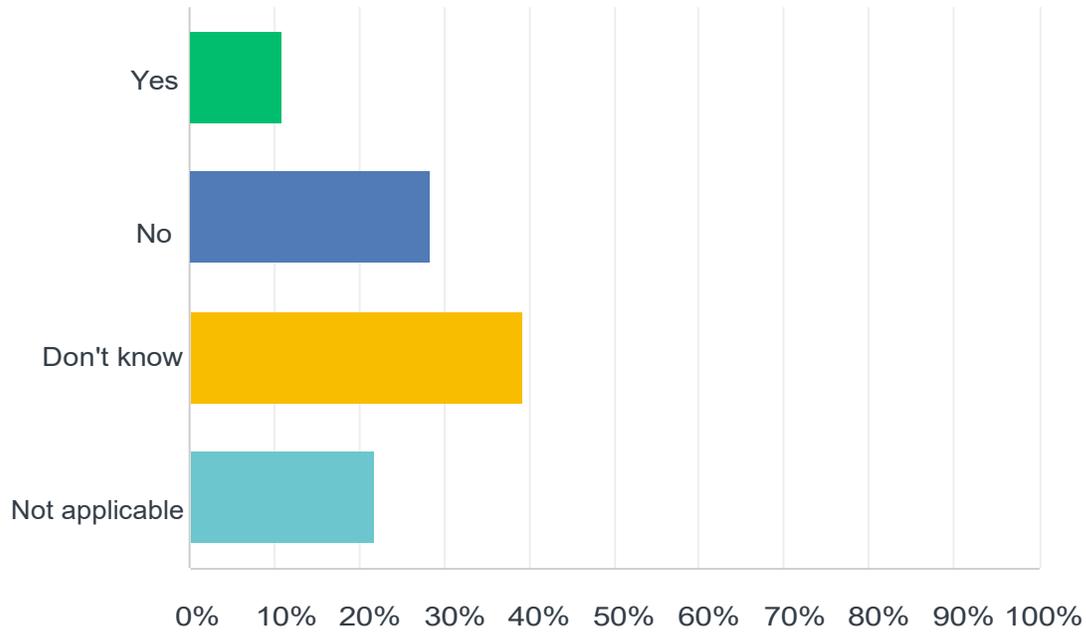
This question only allowed respondents to enter a free text comment, which is available in Annex 2 of this report.

Q26 Do you consider the total annual cost you supplied in Question 25 is proportionate to the benefits delivered by TDLCR?



ANSWER CHOICES	Percentage	No. of Responses
Yes	12.77%	6
No	17.02%	8
Don't know	38.30%	18
Not applicable	31.91%	15

Q27 Has TDLCR had any other impacts on costs you have not already told us about?

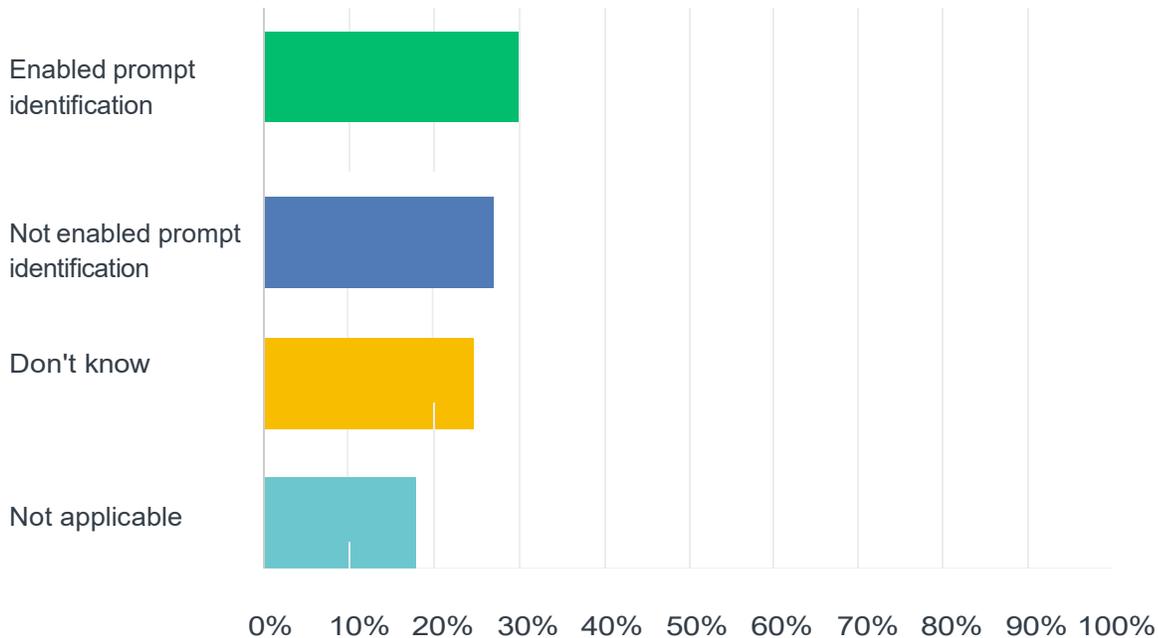


ANSWER CHOICES	Percentage	No. of responses
Yes	10.87%	5
No	28.26%	13
Don't know	39.13%	18
Not applicable	21.74%	10

Q28 What effects have the medical or psychological fitness requirements of TDLCR had on your organisation?

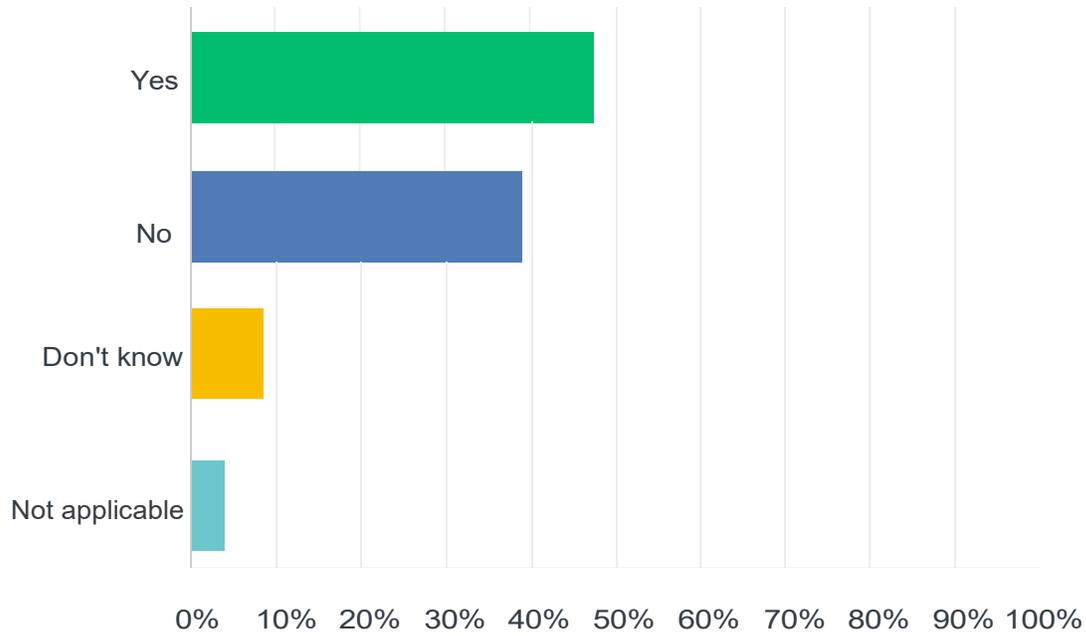
This question only allowed respondents to complete a free text field describing these effects. Respondents could select to tell us about the effects of the medical fitness requirements and/or the effects of the psychological fitness requirements. These responses are available in Annex 2 of this report.

Q29 Have the medical or psychological fitness requirements of TDLCR enabled the prompt identification of driver medical or psychological issues? (if so, can you explain how this has improved safety?)



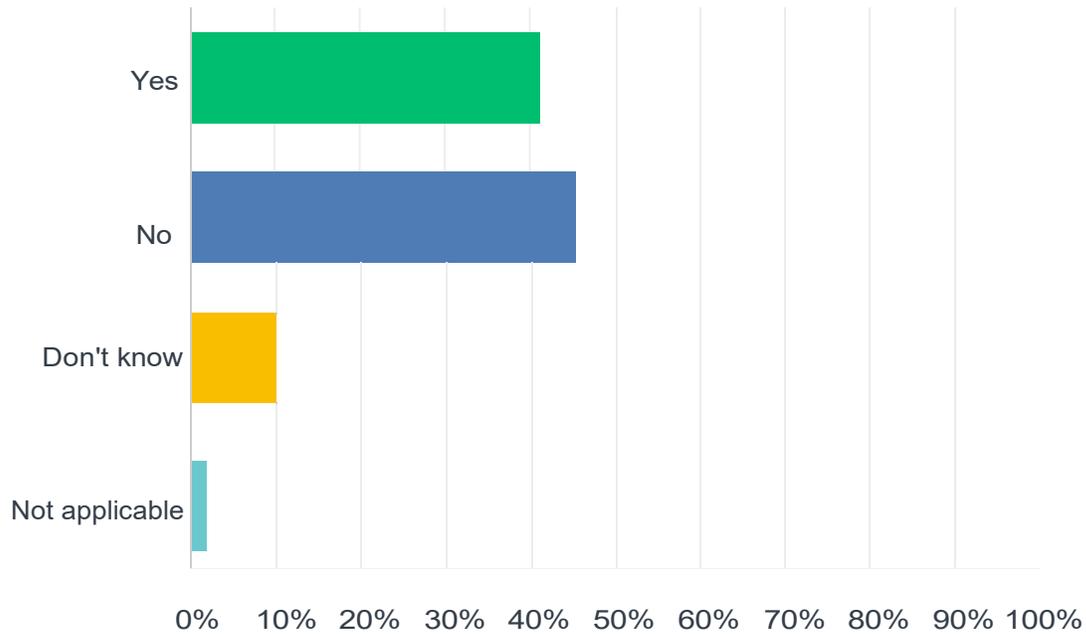
ANSWER CHOICES	Percentage	No. of Responses
Enabled prompt identification	29.55%	13
Not enabled prompt identification	27.27%	12
Don't know	25.00%	11
Not applicable	18.18%	8

Q30 Do you think the current regime of recognised doctors and recognised psychologists is satisfactory?



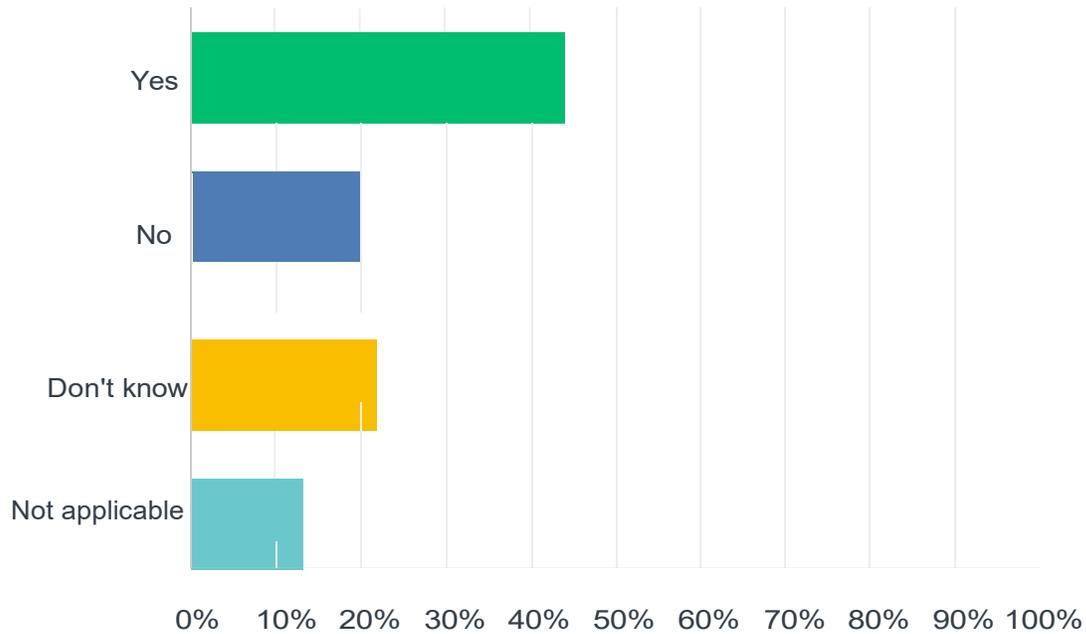
ANSWER CHOICES	Percentage	No. of Responses
Yes	47.83%	22
No	39.13%	18
Don't know	8.70%	4
Not applicable	4.35%	2

Q31 Are the medical requirements under Schedule 1 of TDLCR satisfactory?



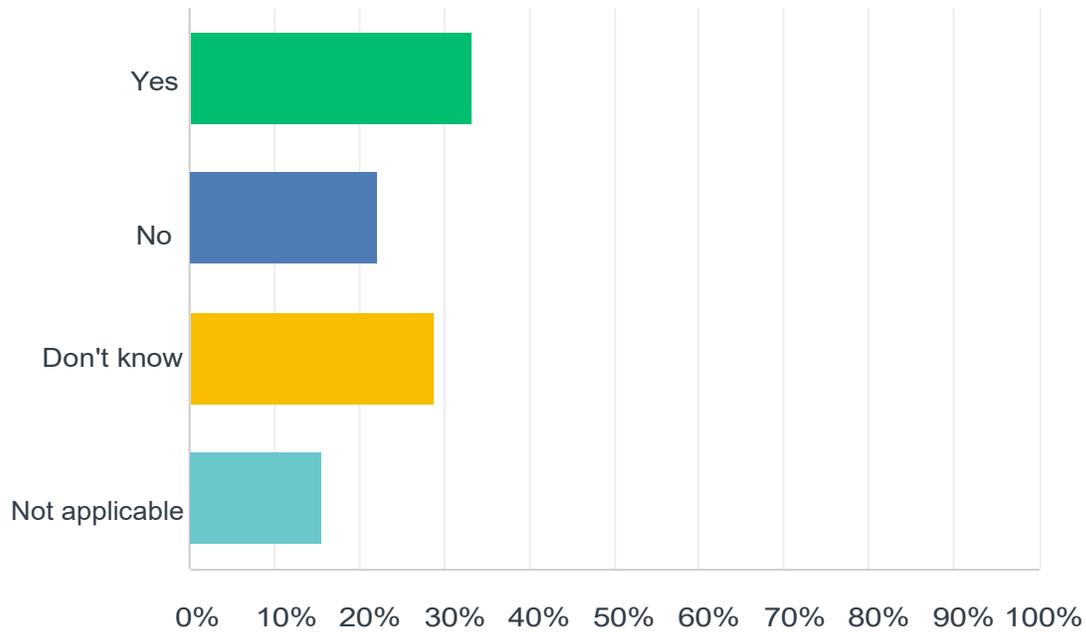
ANSWER CHOICES	Percentage	No. of Responses
Yes	41.30%	19
No	45.65%	21
Don't know	10.87%	5
Not applicable	2.17%	1

Q32 Are the driver training and examination provisions in TDLCR satisfactory?



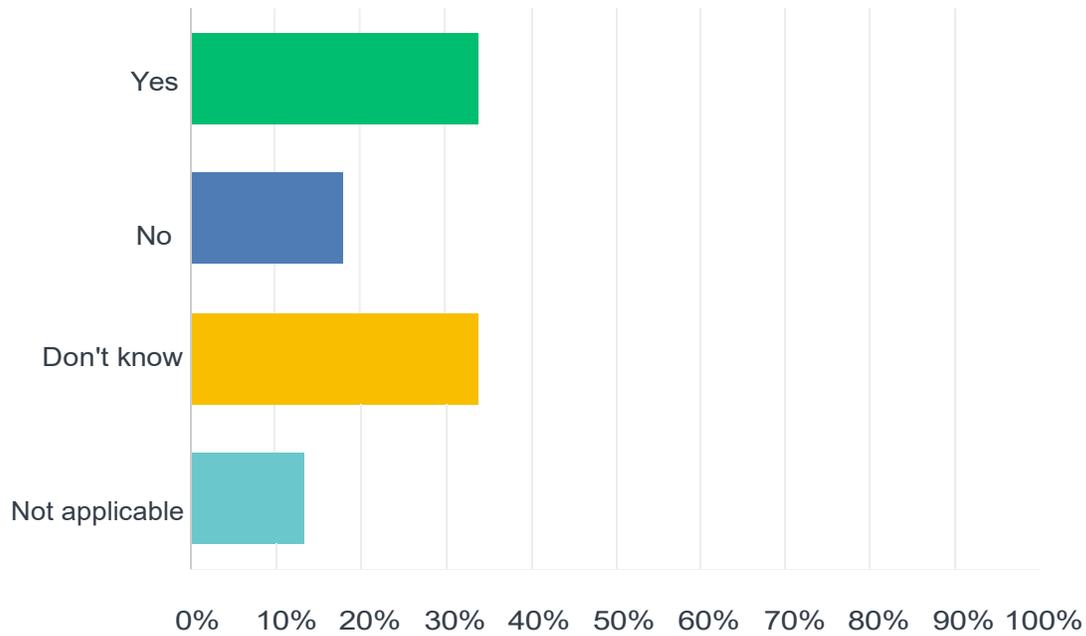
ANSWER CHOICES	Percentage	No. of Responses
Yes	44.44%	20
No	20.00%	9
Don't know	22.22%	10
Not applicable	13.33%	6

Q33 Are the training content and methods that recognised trainers are required to apply under TDLCR satisfactory?



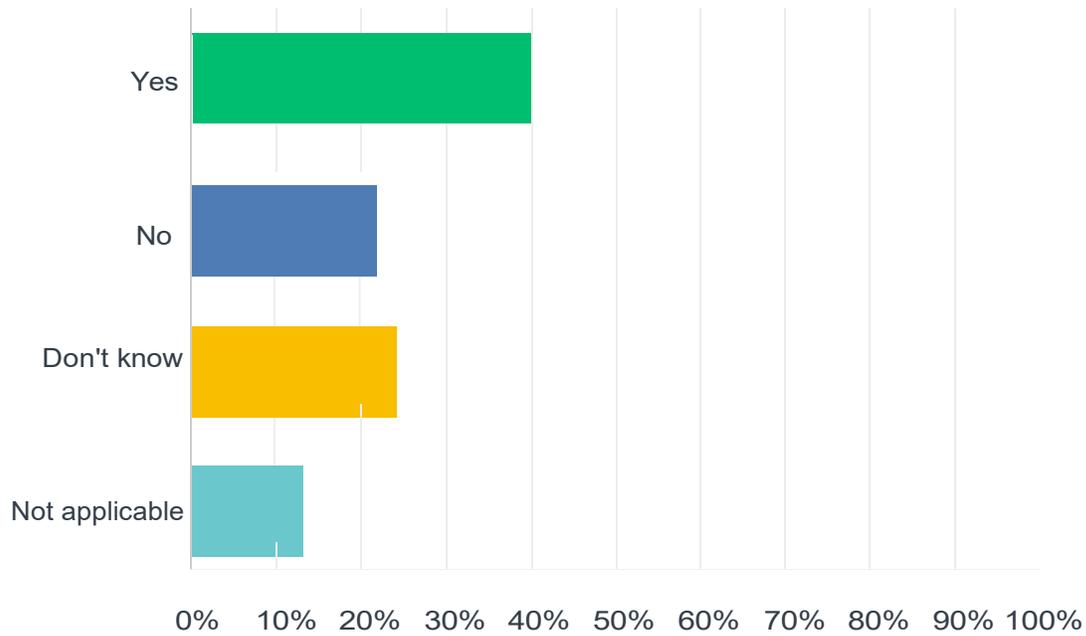
ANSWER CHOICES	Percentage	No. of Responses
Yes	33.33%	15
No	22.22%	10
Don't know	28.89%	13
Not applicable	15.56%	7

Q34 Are the TDLCR general professional knowledge and requirements for train driving licences effective?



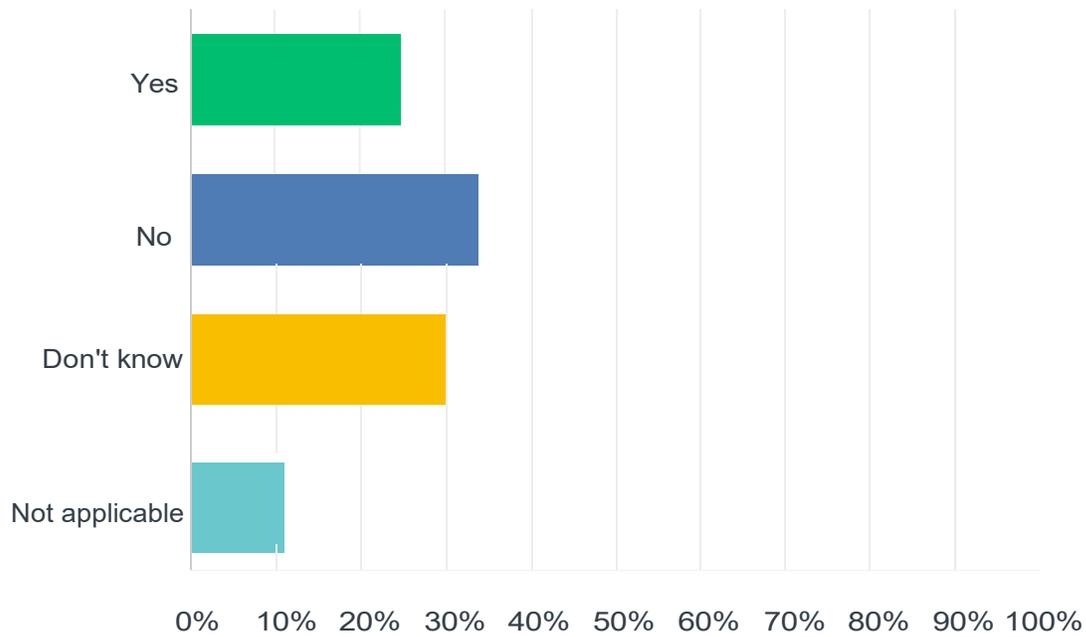
ANSWER CHOICES	Percentage	No. of Responses
Yes	34.09%	15
No	18.18%	8
Don't know	34.09%	15
Not applicable	13.64%	6

Q35 Are the TDLCR professional knowledge of infrastructure and rolling stock requirements for train driving certificates effective?



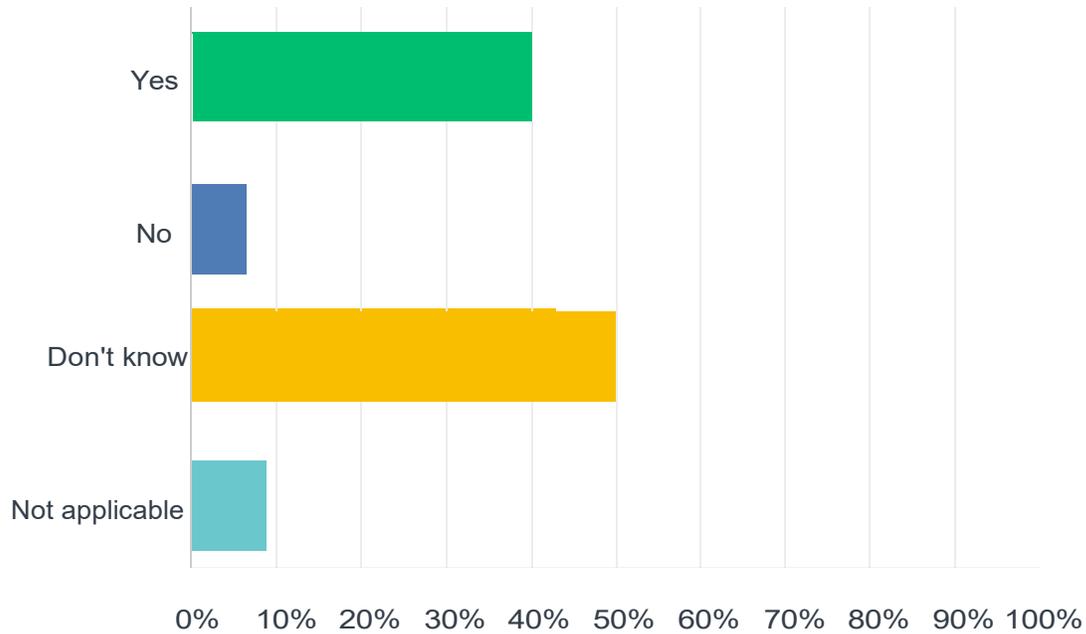
ANSWER CHOICES	Percentage	No. of Responses
Yes	40.00%	18
No	22.22%	10
Don't know	24.44%	11
Not applicable	13.33%	6

Q36 Do you think ORR's arrangements (i.e guidance and other support) for the suspension and withdrawal of licences are effective?



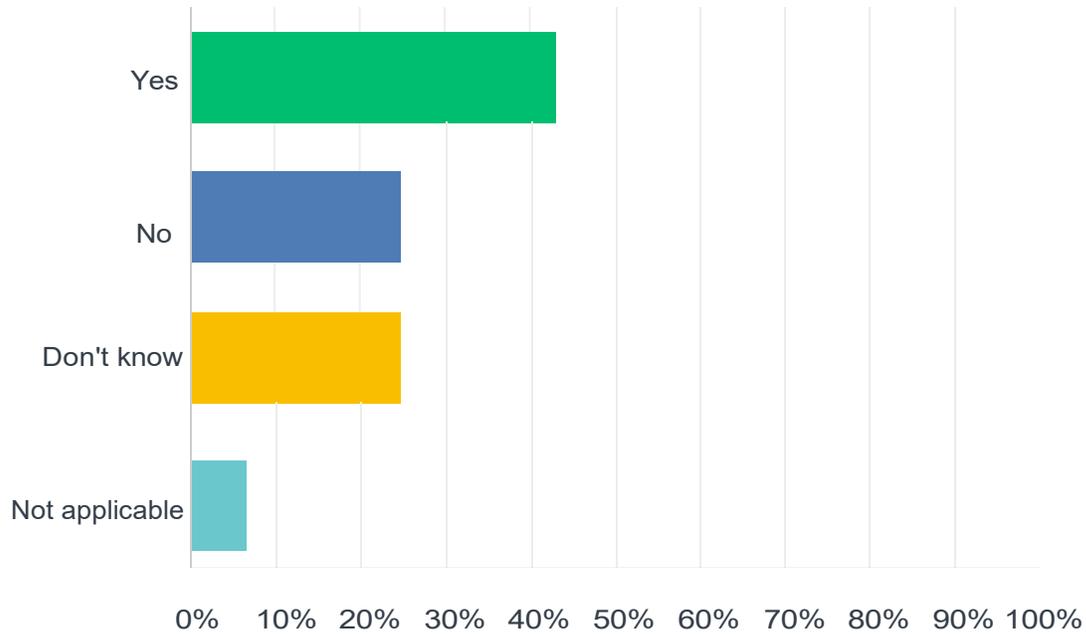
ANSWER CHOICES	Percentage	No. of Responses
Yes	25.00%	11
No	34.09%	15
Don't know	29.55%	13
Not applicable	11.36%	5

Q37 Do you think ORR's arrangements (i.e guidance and other support) for the recognition of training and examination centres are effective?



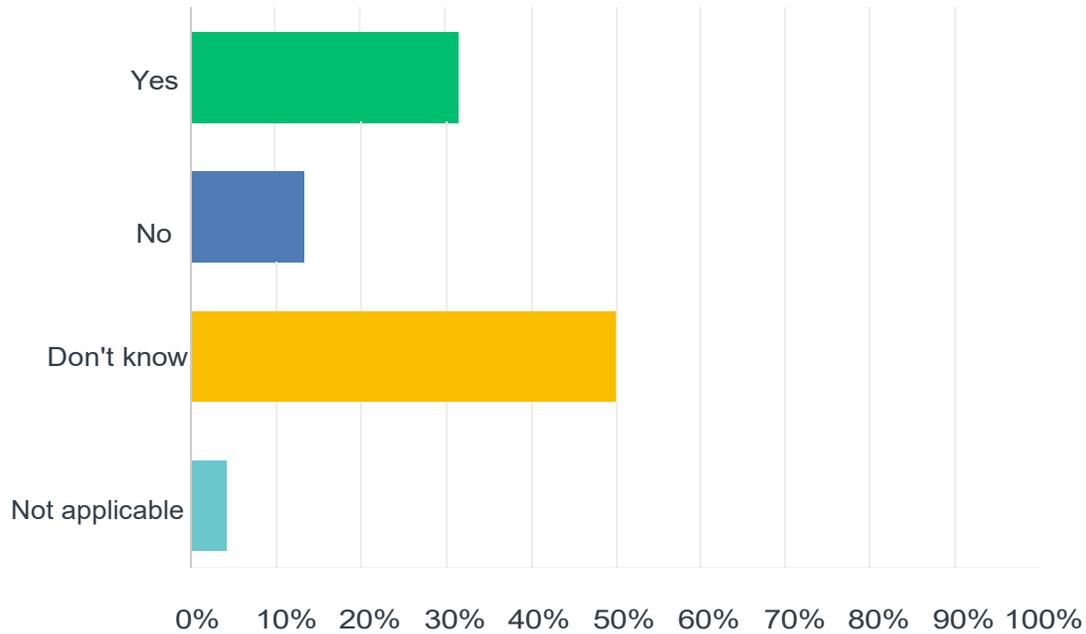
ANSWER CHOICES	Percentage	No. of Responses
Yes	40.91%	18
No	6.82%	3
Don't know	43.18%	19
Not applicable	9.09%	4

Q38 Do you think ORR's arrangements (i.e guidance and other support) for the recognition of medical examiners are effective?



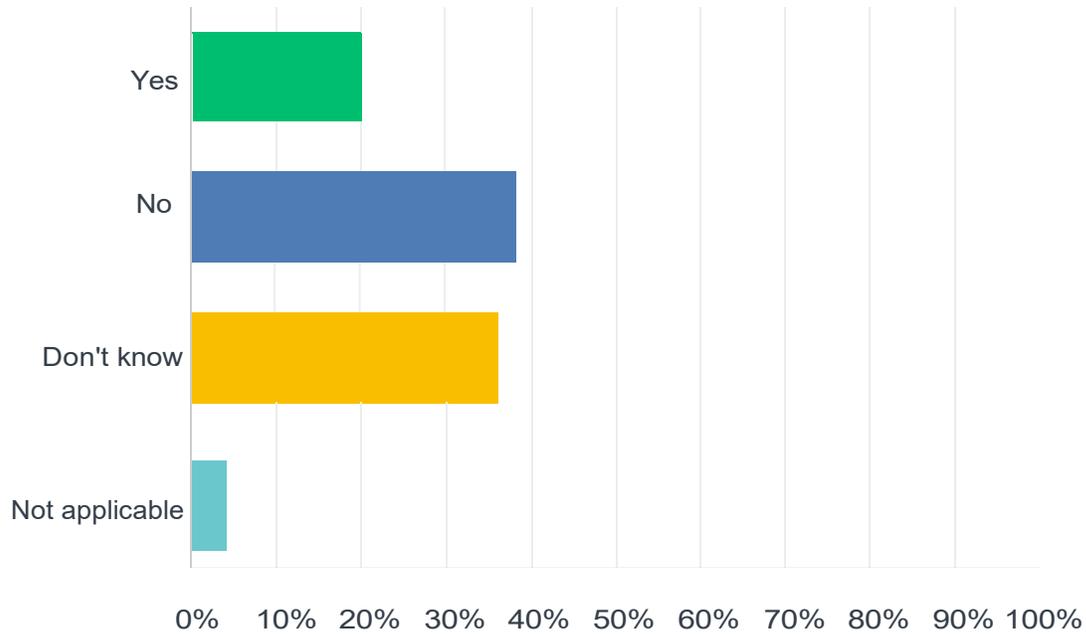
ANSWER CHOICES	Percentage	No. of Responses
Yes	43.18%	19
No	25.00%	11
Don't know	25.00%	11
Not applicable	6.82%	3

Q39 Do you think ORR's arrangements (i.e guidance and other support) for the recognition of psychologists are effective?



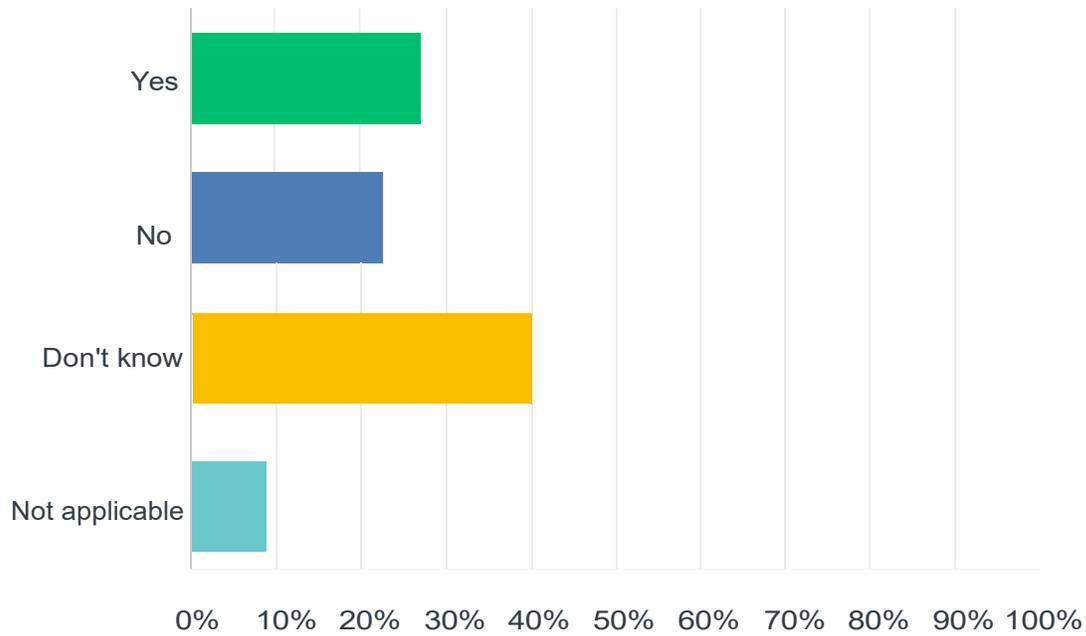
ANSWER CHOICES	Percentage	No. of Responses
Yes	31.82%	14
No	13.64%	6
Don't know	50.00%	22
Not applicable	4.55%	2

Q40 Do you think ORR's arrangements (i.e guidance and other support) for maintaining the register of licenced drivers are effective?



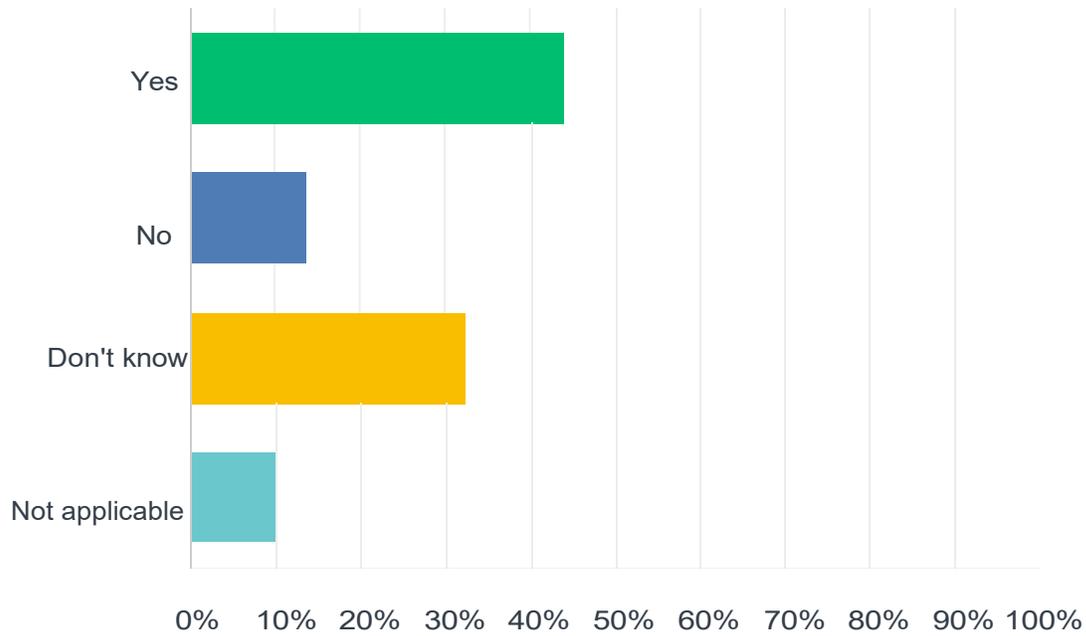
ANSWER CHOICES	Percentage	No. of Responses
Yes	20.45%	9
No	38.64%	17
Don't know	36.36%	16
Not applicable	4.55%	2

Q41 Do you think ORR's arrangements (i.e guidance and other support) for reissuing licences are effective?



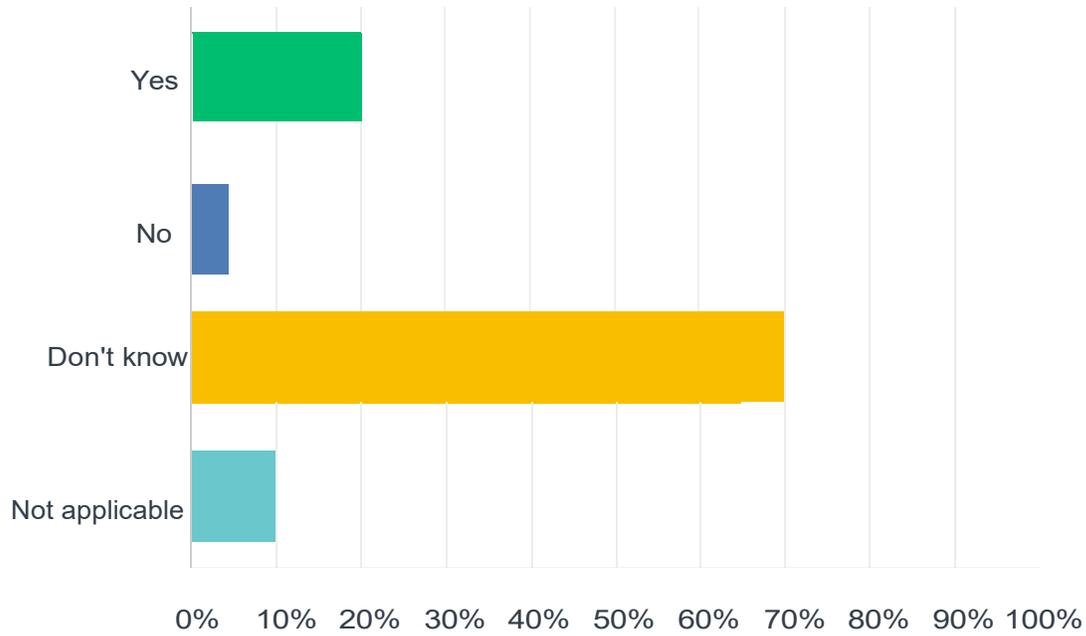
ANSWER CHOICES	Percentage	No. of Responses
Yes	27.27%	12
No	22.73%	10
Don't know	40.91%	18
Not applicable	9.09%	4

Q42 Do you think ORR's arrangements (i.e guidance and other support) for issuing licences are effective?



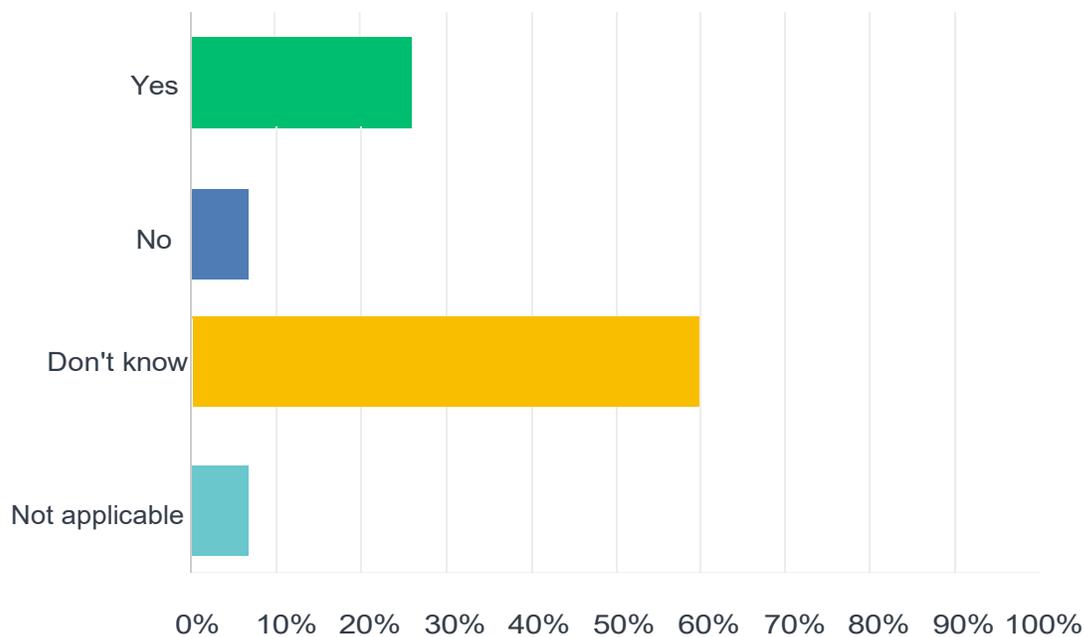
ANSWER CHOICES	Percentage	No. of Responses
Yes	44.19%	19
No	13.95%	6
Don't know	32.56%	14
Not applicable	9.30%	4

Q43 Do you think ORR's arrangements (i.e guidance and other support) for reinstating licences are effective?



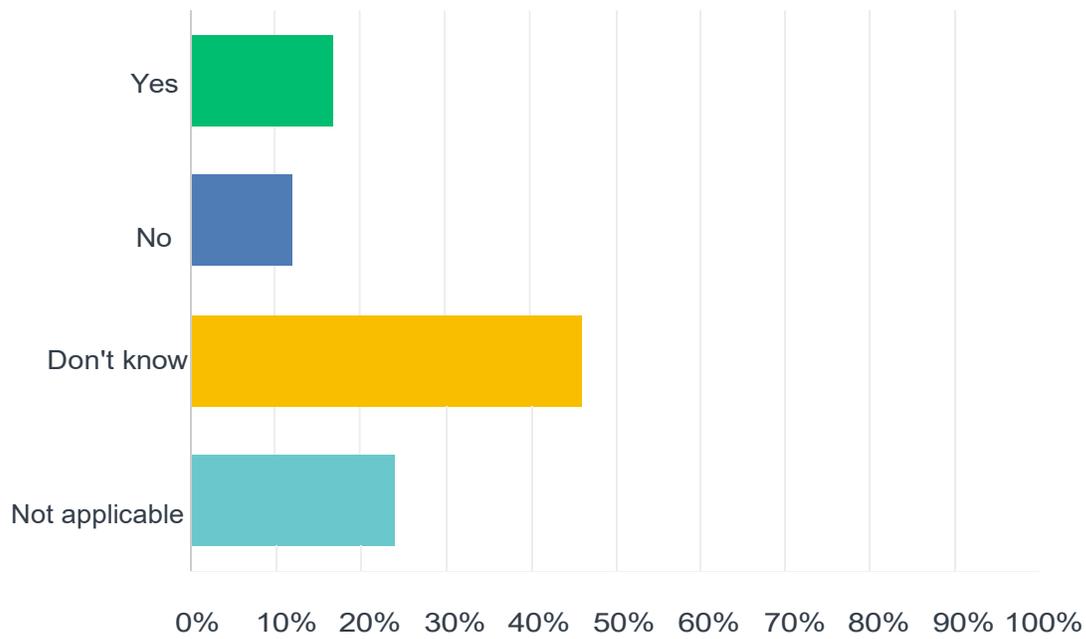
ANSWER CHOICES	Percentage	No. of Responses
Yes	20.93%	9
No	4.65%	2
Don't know	65.12%	28
Not applicable	9.30%	4

Q44 Do you think ORR's arrangements (i.e guidance and other support) for the appeals process for suspended or withdrawn certificates are effective?



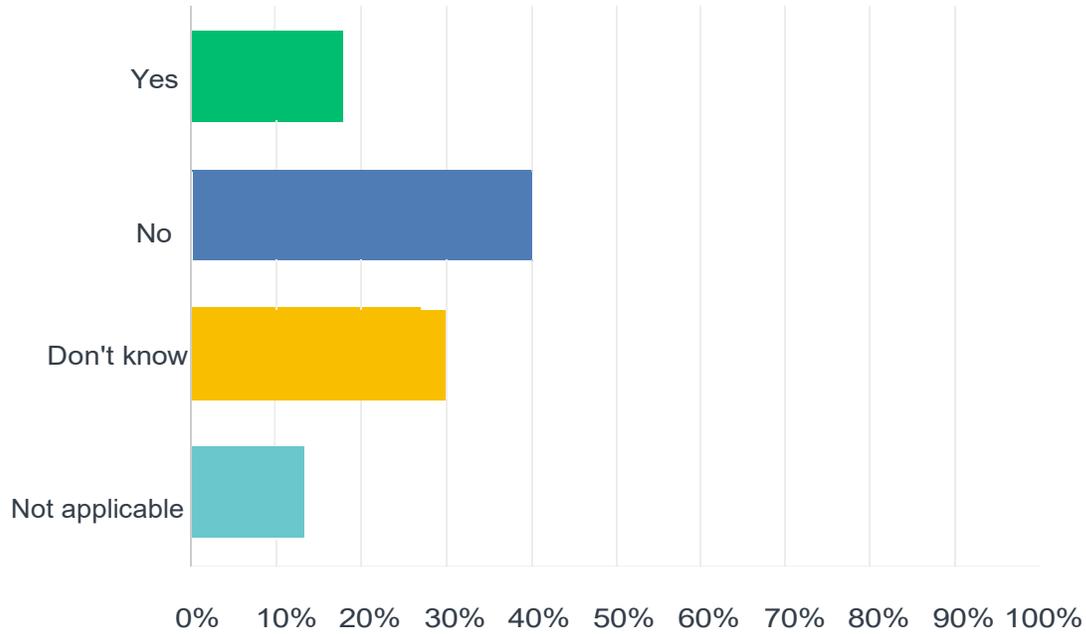
ANSWER CHOICES	Percentage	No. of Responses
Yes	26.19%	11
No	7.14%	3
Don't know	59.52%	25
Not applicable	7.14%	3

Q45 Do you think any other ORR arrangements are effective? (please specify)



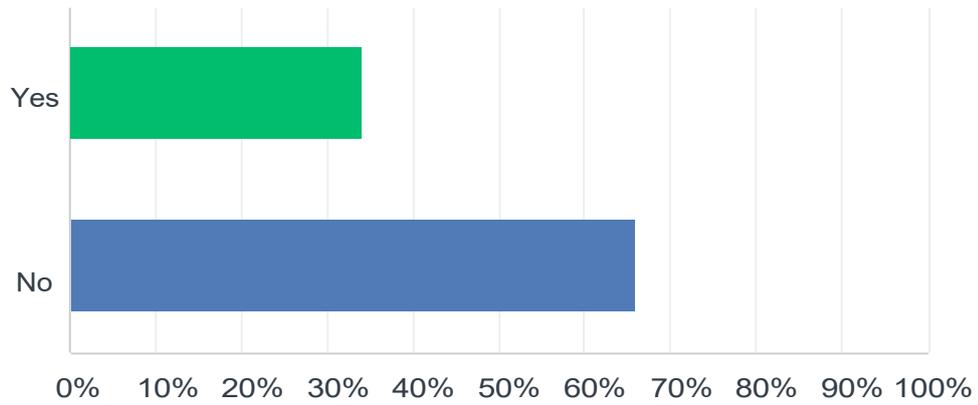
ANSWER CHOICES	Percentage	No. of Responses
Yes	17.07%	7
No	12.20%	5
Don't know	46.34%	19
Not applicable	24.39%	10

Q46 Do you have a view on the appeal process to the Secretary of State which is available to train drivers whose licence has been suspended or withdrawn by ORR?



ANSWER CHOICES	Percentage	No. of Responses
Yes	18.18%	8
No	40.91%	18
Don't know	27.27%	12
Not applicable	13.64%	6

Q47 Is there anything else you would like to comment on which is relevant to this post implementation review of TDLCR?



ANSWER CHOICES	Percentage	No. of Responses
Yes	34.09%	15
No	65.91%	29

Annex 2 – Consultation Survey Comments

1. Most survey questions allowed respondents to provide an (unlimited) free text comment to explain their answer. Together with the answers, these explanatory comments also formed part of the evidence for the post-implementation review.
2. The table below contains all the comments we received, grouped for each question. In line with the privacy statement for the survey, responses have been anonymised, although we do indicate the type of respondent alongside each comment. Where a respondent selected more than one organisation type at question 2 (for example, a Train Operating Company which is also a Training and Examination Centre), the table shows only the lead selection.
3. Question 1 was to gather each respondent's organisation and contact details. These are not reproduced below in order to maintain confidentiality. Questions 2 asked about the respondent's type of organisation and 3 asked about the number of licenced drivers employed. Both those questions did not ask for further comment, and the full responses to those questions are shown in Annex A.

Question	Comment	Type of Organisation
4. Overall, in your view, what impact has TDLCR had on the safety of the mainline railway?	Overall, we believe that the TDLCR has had no effect on the safety management of train drivers. It has meant that train operating companies have had to change their systems to accommodate the requirements in the TDLCR but this has largely been administrative.	Railway Industry Body
	<i>The regulations set a good benchmark for safety</i>	Other
	<i>There have maybe been some small positive impacts related to having external validation of a basic Driving competence although due to the effective ROGS regime prior to TDLCR coming in, we believe these are at best very small and may be non-existent. However, there have also been negative impacts including increase of costs and so we would have liked the opportunity to tick "neutral impact" or both positive and negative impacts, this box does not exist so I have ticked "no impact."</i>	A FOC
	<i>Overall, the view of the Railway Undertakings is that there has been little to no impact on safety due to the implementation of TDLCR. The management of Train Drivers, as they are undertaking a safety critical activity, has always been and remains an important focus for Railway Undertakings.</i>	Railway Industry Body
	<i>I can't comment on whether or not there has been a significant change in the safety of medical assessments since this legislation has been introduced</i>	ORR recognised occupational health doctor
	<i>Prior to TDLCR we already had a robust system in place for driver licence and monitoring. There have been some positive impacts such as the certificates are useful when hiring drivers as they are good for checking route and traction from other TOCs – minimum standard The National register of drivers, so drivers should be trained to a set standard, demonstrating that they are capable to hold licence, which hopefully removes rogue drivers from the system TDLCR also provides a level of protection – ORR can remove the licence so they cannot get job elsewhere</i>	A TOC
	<i>Given guidelines in safety of drivers</i>	ORR recognised occupational health doctor
	<i>A legal framework to manage driver competence across the industry including medical fitness. Audit trail moving between businesses. Gives the driver ownership of their competence.</i>	An ORR-recognised trainer/examiner

	<i>Good medical health standard from train drivers</i>	ORR recognised occupational health doctor
	<i>There has been no demonstrable impact on safety as they existing arrangements to manage this have continued</i>	A TOC
	<i>Standardised processes and requirements across the industry.</i>	An ORR- recognised training centre
	<i>No major change with regards to drivers competence pre ETDL.</i>	A TOC
	<i>Any incidents would have occurred irrespective of the driver holding a licence</i>	A TOC
	<i>From our point of view the TDL has not given us anything else other than additional workload to ensure that we have registered the drivers with the ORR and that we have a card license with paper support.</i>	A TOC
	<i>Just means the Drivers require to carry a TDL & CC when on duty.</i>	A TOC
	<i>The licencing system provides very little in the way of assurance in the UK. When drivers move from one company to another in the TOC world we still reassess on all relevant routes and traction so the transfer on the ORR database proves very little that we couldn't do previously with the transfer of safety information forms that are still completed alongside the TDL.</i>	A TOC
	<i>Although we see some negative effects emanating from TDLCR, from a mainline safety perspective, we believe that it has had a positive impact because it ensures that the personal health of staff from age 55 is regularly checked. This may then give some mitigation to the risk of sudden serious illness whilst driving a train with all of the potential outcomes that may cause. However, our feeling, based on feedback from members, is that it is open to question whether requiring annual medicals from age 55 is the right age to commence this health surveillance. Many members feel it may be too early.</i>	Trade Union
	<i>we have not seen any obvious safety benefits with the introduction of the TDLCR</i>	A TOC
	<i>The previous arrangements for competence management and licencing for train drivers has continued, and the overlay of the TDLCR has not had a demonstrable improvement in safety. Therefore they can provide an additional burden of admin without providing a tangible safety benefit</i>	Other - Professional Head of Operational Safety
	<i>I felt the entry tests appropriately assessed my natural ability to concentrate & gave me the confidence (on passing) that I had the basic</i>	Train Driver

	<i>aptitude to move to formal training. The training cycle was then robust with regular assessment of retention of knowledge & skills. I'm now a PQ driver and feel any lessening of the training I undertook would diminish my ability to safety drive trains</i>	
	<i>We have an approved competency management system supported by a wider safety management system as part of our Safety Certificate. It's not felt that the addition of licencing requirements has added anything of significant safety value to these procedures.</i>	A TOC
	<i>We have not identified any factors from our investigations into incidents where TDL has enhanced safety as all our competence management procedures were established prior to this and we apply industry good practice anyway</i>	A TOC
	<i>it has caused extra work but it puts every driver on the same level, no one can embellish their operational competences, however it has not worked as well as I have expected and guess it works much better within the EU</i>	Trade Union
	<i>Streamlines the regulations however not all are routinely applied within the business</i>	ORR-recognised trainer/examiner
	<i>It ensures Train Drivers meet the required medical and psychological standards that are required to drive a Train. With Annual / triannual medicals dependant on age, we continue to ensure Driver remain to complete the Job.</i>	TOC
	<i>No one can undertake these duties without the proper competence and certification</i>	Other -Railway Contractor / Driving Standards Manager
	<i>Prior to TDLCR information was limited and localised on driver requirements. National requirements has introduced minimum information standards.</i>	Other - Rail Consultant
	<i>After all many TOCs/FOCs in the UK already had safety standards above what was set out in the criteria</i>	Train Driver
	<i>I have no comparison as I have only worked in relation to TDLCR</i>	An ORR-recognised occupational health doctor
	<i>Not my field of expertise.</i>	An ORR-recognised occupational health doctor
	<i>medical standards for rail workers/ train drivers considered</i>	An ORR-recognised

		occupational health doctor
	<i>Safety has improved</i>	Other - Retired Train Driver
	<i>I fail to see how it has made any impact to safety as its an onerous process that does little to manage risk. If the processes/access/information sharing was more streamlined and simple, it may be of benefit.</i>	A TOC
	<i>As a result of the TDL Regulations we know Drivers are medically fit to complete their role & are competent due to the cycles of assessments etc. The complimentary certificate shows their routes & traction driven</i>	Other - Individual Response
	<i>I was very pro-TDLC when it was first mooted especially as I hoped it would eliminate the serial job movers either through desire or as a result of discipline. This has not really been the case. I don't think that this is necessarily the fault of the system more that people are not using the system correctly.</i>	An ORR-recognised training centre
	<i>Duplicated existing arrangements</i>	An ORR-recognised occupational health doctor
	<i>The license initiative has reduced the schedule for medicals, particularly for those over 55 where health issues are statistically more likely to arise.</i>	A FOC
	<i>I don't think this system has had any impact on the system although if it were managed more like a car driving license this would have a positive impact on the industry</i>	Other - Driving Standards Supervisor
	<i>TDLCR has added a layer of expensive bureaucracy to the industry, which is an ongoing cost that delivers very little, or no, benefit to the industry as a whole. We have not seen any tangible safety benefits from these regs, that is resource hungry to administer. We appreciate that the regulations were imposed on us when we were in the EU, however, we very much welcome this review so that, if we are to retain this legislation - or some variant of it - then it must be cost effective to operate and delivers clear benefits to everyone that uses it and administers the processes. There are other ways to maintain the standards of medical fitness and competence required to be a driver - historically mandated through Railway Group Standards - and that is to return to that process.</i>	A TOC
	<i>I do not know</i>	A TOC
5. Which of the following do you think should apply to TDLCR:	<i>From a medical perspective, it would be useful to have additional guidance and clarification provided on the nuance of what different parts of the legislation mean – for example, what does</i>	Railway Industry Body

<ul style="list-style-type: none"> • remain without amendment. • remain but with some changes. • should be replaced or redesigned. • should be removed or replaced. 	<p><i>'ability to withstand dazzle' mean realistically, or more detail on different elements of 'good' or 'sufficient' so that RSSB standards and guidance on how best to meet these requirements can be made more targeted and accurate. Further guidance on what 'another recognised test' means for colour vision testing is another example in this area.</i></p>	
	<p><i>The Regulations as they are stifle innovation by not allowing this important area to be innovated through digitalisation. Digitalisation would make the transfer of records and competencies much easier. We are also concerned that the syllabuses for the training of drivers are somewhat stuck in the past and take little or no account of the modernisation of the network and the changes to more sophisticated rolling stock.</i></p>	<p>Railway Industry Body</p>
	<p><i>I believe more can be done to influence the role of recognised doctors.</i></p>	<p>HM Inspector of Railways</p>
	<p><i>There are some basic features which are useful however the possible advantages of the TLDCR framework are not being fully realised. For example, when we recruit a Driver from another FOC and ask for the safety information as per RIS-3751-TOM, the info from TLDCR often does not match reality. Such as the TLDCR print-out showing Route knowledge for routes the Driver no longer signs. The TLDCR info held by those FOCs is evidently not up to date (or not properly integrated with their CMS) however all their other CMS info they send is up to date. A similar issue has arisen with medicals where TLDCR info shows medicals up to date but clear evidence of in-date medicals is provided. Similarly for traction competence. So the only useful part is confirming a basic Driving competence, which we could anyway do from the ROGS CMS info. Where the Driver is not currently working, queries about validity of a Licence can take a long time to come back from ORR's team- assuming one gets a response at all. From conversations with Drivers who have been out of Driving for a while it is also likely that "inactive" Drivers do not get followed up in the way that the TLDCR guidance indicates they will. The context of this is that the TLDCR imposes a prescriptive regime on top of ROGS which in turn</i></p>	<p>A FOC</p>

	<p><i>imposes additional costs particularly on smaller FOCs e.g. can only sign off traction if registered as a Driver Training organisation, so you either have to set up the whole system for this even if all you want to do is train for traction. Where traction is unusual this may prove extremely costly. Overall therefore, given the inaccuracies in the TLDCR information and the prescriptive framework imposing additional costs I believe it is difficult to justify retaining TLDCR in current form. It should also be noted that ROGS requirements are deemed adequate for every other safety critical role on the railway. We also note that some potentially useful features of the Licensing regime were not implemented (the categories of Driver), and the TLDCR is of much less use on GB where we use Route-based signalling rather than in central Europe where there is more adoption of a common speed-signalling framework which creates genuine interoperability. Overall, we suggest that for Train Operators who do not run cross-channel services, the TLDCR is of extremely limited value yet imposes additional costs. The framework for Safety Certificates now clearly separates permissions for GB-only vs GB and EU operation, so it could be viable to have TLDCR for only the cross-channel operators.</i></p>	
	<p><i>{redacted} will continue to seek exemption from TLDCR requirements due to the geographically limited scope of operations onto the mainline railway and by virtue of being a tourist railway.</i></p>	<p>Other - Heritage Railway Operator</p>
	<p><i>It is believed that the regulations are too low level and do not fit with the usual approach taken by Government. The regulations should be set at the level of Goal Setting enabling the industry to determine the more cost effective and beneficial way of meeting such goals. The regulations, as they currently stand create an unnecessary administrative burden to Railway Undertakings. In particular, the medical requirements should be amended considering that the population of Great Britain is living healthier and longer lives as reflected by the changes to the state pension as well as railway pension schemes. The Knowledge requirements for Rolling Stock should match current practice. The arrangements set in place by the ORR should be streamlined and made more interactive for railway undertakings.</i></p>	<p>Railway Industry Body</p>
	<p><i>There are some aspects of Schedule 1, particularly around the vision standards that are open to misinterpretation. Sensitivity to contrasts and ability to withstand dazzle are not possible to</i></p>	<p>An ORR-recognised occupational health doctor</p>

	<i>assess in an OH consultation. I would like to understand the evidence base for the audio guidance standard. The requirement for assessors to undertake a general medical examination is vague and unhelpful- what does this entail and who should do it? It's clear that different OH providers have different approaches to this, some undertake face to face OHP assessment, while others only have F2F Nurse assessment. The ORR advises full cardiovascular, respiratory , musculoskeletal and neurological assessment. An OHN would not have the necessary competence to undertake this.</i>	
	<i>Due to the work that TOCs have put in to embed the licence arrangements it would be counter productive to remove them now and replace with something else. Subsequent questions cover issues that need changing such as medical standards and administrative burden on TOCs</i>	A TOC
	<i>In areas of fitness for work. Need clarity of F1, F2 outcomes</i>	An ORR-recognised occupational health doctor
	<i>In principle the process should remain, some changes would benefit future use of the process.</i>	An ORR-recognised trainer/examiner
	<i>Some of the medical standards are inappropriate and are not being used.</i>	An ORR-recognised occupational health doctor
	<i>Some aspects such as a central register and commonality in license and complementary cert are useful, however other aspects that have an admin and cost burden with no or little value should be removed</i>	A TOC
	<i>Reduction of the languages requirements (no level for written language competency) Simplification of recognition of accredited doctors and psychologists</i>	An ORR-recognised training centre
	<i>Experience for assessors and examiners (DTMs), remove this restriction and allow TOCs to recruit based on ability and skills.</i>	A TOC
	<i>TDLCR has caused tangible disbenefits within the company. It is admin heavy for no obvious gain</i>	A TOC
	<i>Traincrew have a route and traction cards endorsed, supported by the RIS to allow safety of the line data to be transferred between companies.</i>	A TOC
	<i>The system seems satisfactory for our TOC/RU. Why constantly is there a need to change.</i>	A TOC
	<i>The maintenance of the portal is very time consuming with a lot of unnecessary emails</i>	Driver Manager

	<i>required to and from the ORR. It doesn't really prove any competence other than routes or traction which we retrain and reassess anyway.</i>	
	<i>Overall, {redacted} Driver Managers members do not want to see the TDLCR replaced by another system because getting it set up in the first place was problematic. Instead, they believe that certain changes have to be made to enhance the way it works and make it more useful for their purposes about driver recruitment. We will develop this point in our response later suffice to say at this stage that there is a need to review the frequency of age related medicals and develop a GDPR compliant train operator wide database that contains drivers' records that can be used for recruitment purposes.</i>	Trade Union
	<i>Guidance is very vague and open to interpretation. more user friendly and flexible portal</i>	A TOC
	<i>The principle of free movement of labour for train drivers existing prior to the TDLCR under the transfer of safety critical info controlled by RIS-3751-TOM). The cross-boarder operation does not apply to UK domestic operations and therefore the applicability to UK domestic operators should be reviewed.</i>	Other- Professional Head of Operational Safety
	<i>ORR Registered Doctors are in short supply in the industry and making it difficult to operate in some regions. Need to consider some mitigation around this in TDLCR. The pool of registered Dr seems to have shrunk. In addition, the TDLCR rules around training and assessing drivers has made the driver manager role a scarce resource. I can understand training drivers requires a level of experience but does assessing require a fix number of years. People learn at different paces and I believe that someone should be able to assess another driver when they are competent and confident to do so - why is there a set amount of experience for everyone? It should be based on an Individuals capability and not an arbitrary number of years.</i>	A TOC
	<i>TDLCR undoubtedly requires change to make them more manageable and less of a burden, but replacing them will likely cause confusion. Removal altogether may give the perception (among staff / public) that it is a step back in safety management. Key changes required are in connection with the administrative burden and frequency of medicals</i>	A TOC
	<i>Tempted to say removed due to the admin burden of the processes but there is a need to streamline the regs and remove red tape</i>	A TOC

	<i>I am currently booked off as "unfit to drive trains" because of the corrective lens strength limits imposed by the TDLCR. 20 years without a vision related safety of the line incident and I'm now unfit!!</i>	A train driver
	<i>you can always improve things</i>	Trade Union
	<i>Make procedures more rigid rather than guidance</i>	An ORR-recognised trainer/examiner
	<i>The TDLCR works so why change it. The only amendment I would make is with reference to 'Psychologist' as those that undertake the recruitment process and do the psychometric tests are not psychologists.</i>	An ORR-recognised occupational health psychologist
	<i>The licences should remain, as they confirm to anyone that the Driver has passed necessary tests and training and is competent to Drive a train.</i>	A TOC
	<i>If you are an OTM driver you cannot just leave to go and drive freight with out a minimum of 5 years driving experience</i>	Other - Driving Standards Manager
	<i>A more UK centred approach but remain sensitive to markets.</i>	Other - Rail Consultant
	<i>Why change a system that works</i>	Train Driver
	<i>Some of the medical standards are not evidence based and justifiable for diversity, inclusivity and avoidance of discrimination on disability grounds.</i>	An ORR-recognised occupational health doctor
	<i>improving the medicals carried out for train drivers considering more standardised tools for assessing mental health</i>	An ORR-recognised occupational health doctor
	<i>Unsure of the value of the TDL - think the processes behind the management of licenses if laborious and clunky</i>	A TOC
	<i>SI 1798 amendment schedule 3 should be enforced. Currently non-compliant re General Professional Knowledge. How can drivers that don't even understand the units of deceleration perform a brake performance calculation. Numerous {redacted} investigations reveal the shocking evidence of non-compliance. Including the {redacted} tragedy. (re polarised braking mentality) and {redacted} - 8 coaches isolated from brake control and the driver failed to understand, lucky we didn't have our very own {redacted} train crash.</i>	Other - Retired Train Driver
	<i>The processes/access/information sharing would benefit from being more streamlined and simple</i>	A TOC
	<i>The ETDL could become a smart card with all the information held electronically. Remove the need to show glasses & hearing aids on the licence but perhaps show on the complimentary certificate - a lot of work is required to obtain a</i>	Other - Individual Response

	<i>new photo etc when there are any changes. Easier transition when Drivers move between TOC's - not all Drivers or companies advise the ORR</i>	
	<i>From a medical requirements perspective, I think the standards need revision as they do not necessarily reflect the physical and sensory safety and performance- related tasks of the role and therefore could be discriminatory. risks can be different depending on the nature of the work environment and therefore having blanket standards that do not allow Individual risk assessment or derogations is contra to the Equality Act.</i>	An ORR-recognised occupational health doctor
	<i>Fundamentally agree with the principle however in reality it hasn't made much of a change to driver management. In some areas (frequency of medical exams for example) it has had a negative impact.</i>	A FOC
	<i>Schedule 1 is confusing and can be simplified and clarified</i>	An ORR-recognised occupational health doctor
	<i>Should be managed like vehicle licenses with any safety of the line incidents expiring after a set period.</i>	Other - Driving Standards Supervisor
	<i>As mentioned above, there is no benefits to TDLCR. Minimum medical and competence standards can be regulated through railway group or rail industry standards, which form part of operators access authorization.</i>	A TOC
	<i>Seems to work</i>	A TOC
6. Do you think TDLCR has brought about benefits?	<i>As far as the Driver Training Agency is concerned there has been a benefit in as much that there is a basic set of requirements that all train operating companies should follow. However, we would question these requirements as we believe they are incomplete and set at too low a level.</i>	Railway Industry Body
	<i>It sets a good standard of expectations for drivers.</i>	HM Inspector of Railways
	<i>On balance, the benefits are minimal as they are confined to confirming general competence. This is of limited use because we in any case have to obtain considerably more information from the ROGS CMS to check a Driver's competence.</i>	A FOC
	<i>The ease with which we can utilise holders of train driving licences and certificates has helped with the utilisation of volunteer drivers on our [redacted] services.</i>	Other - Heritage Railway Operator
	<i>TDLCR has encouraged the industry to provide a higher quality of driver training facilities by setting minimum standards for the recognition of training centres. This has assisted railway</i>	Railway Industry Body

	<i>undertakings in putting over the “professionalism” message to candidate train drivers. Train Drivers also, in general, are proud of their train driving licence which again aids professionalism.</i>	
	<i>Can't comment, I have worked with TDLCR for most of my rail career as have been assessing cross border drivers in the main.</i>	An ORR-recognised occupational health doctor
	<i>From a driver point of view there is a consistent process across the rail network. Ability to check on drivers from other TOCs. Central qualification – standards Sense of achievement for drivers - licence It's good to see a license qualification – the plastic card is comparable across the industry, at least in the UK. A UK operator will see competence has been established previously.</i>	A TOC
	<i>Provides good overall driver health standard</i>	An ORR-recognised occupational health doctor
	<i>IT's increased administrative time and costs, and other areas such as the management of licensing etc was already in place in operators SMSs</i>	A TOC
	<i>Certainly, yes before Brexit. Even beyond, it provides standardisation across the railway infrastructure.</i>	A TOC
	<i>A level of standardisation with regards to issue of licence, reassurance of qualified</i>	A TOC
	<i>No tangible benefits are evident</i>	A TOC
	<i>Regarding transfer of Drivers it is a starting point to show competency</i>	A TOC
	<i>Our response is a qualified YES as we see the benefit being that of staff transferring to another TOC because it provides a countrywide, standardised and professional license for train drivers that wasn't in place before when each company produced its own. The License comes in two parts, Part 1 (the “plastic license”) confirming that the holder is a qualified driver and Part 2 (the “paper license”) giving details of the competencies held, including traction types, routes signed for, etc. Some firms, however, require the paper license to be surrendered when a person leaves their employment because it acts as the authority to drive for that organisation. Irrespective of whether the transferring driver is able to retain the Part 2 paper license, the firm she/he moves to will require that person to undergo traction and route training, even if they have those competences from the firm they have just transferred from</i>	Trade Union

	<i>(including for the same route). This seems to be a duplication and waste of money. Driver Managers point to the DVLA arrangement which has all the required assessed competencies on one license which is not surrendered unless a breach of law takes place. We also do not see the TDLCR working as well as it does in Europe because apart from [redacted], there is no cross-border benefit.</i>	
	<i>improved the evidence of competence on a ad hoc basis</i>	TOC
	<i>The previous arrangements for competence management and licencing for train drivers has continued, and the overlay of the TDLCR has not had a demonstrable improvement in safety. Therefore they can provide an additional burden of admin without providing a tangible safety benefit. However the central database of drivers can be useful as a check and balance to support the process of transferring safety critical information under RIS-3751-TOM, and should remain)</i>	Other - Professional Head of Operational Safety
	<i>Consistent standards, equally applied across all operators and enforceable.</i>	Trade Union
	<i>It's made the driver training a lot more professional and there is a greater acknowledgment around the depot that more recent drivers are undertaking their duties with a greater level of understanding & knowledge about the safety rules & procedures.</i>	Other - Train Driver
	<i>The need for training centre (in particular) and medical practitioner accreditation has set minimum standards in terms of requirements. It has also given the ability to check the status of a licence when employing a driver from outside the business, however this tends to happen too late in the recruitment process. I would like to see these checks happen much earlier, certainly before an offer of employment is made. Access to the national system by selective responsible people would be beneficial.</i>	TOC
	<i>CMS, medicals, drivers transferring and record keeping were already in place and the industry had processes for managing these. I would have hoped that TDL would have brought some consistency to the industry but we all still use different systems for managing the above so apart from the TDL portal nothing has changed apart from increased admin and costs in medicals etc.</i>	TOC
	<i>I believe that it has given drivers a sense of responsibility for their profession and wellbeing.</i>	Trade Union

	<i>Allows the industry to focus on the requirements for Drivers to obtain and retain a licence however there needs to be more ORR involvement and monitoring. Currently my licence does not distinguish the grade and status other than a driver even though I am involved with training and assessing competence.</i>	An ORR-recognised trainer/examiner
	<i>Helps to standardise the whole process and ensure a minimum standard is obtained across all organisations and Individuals</i>	An ORR-recognised occupational health psychologist
	<i>Everyone is certificated and competent</i>	Other - Driving Standards Manager
	<i>Partial in particular centralised information on driver transfer / movements.</i>	Other - Rail Consultant
	<i>Easy TOC recruitment processes</i>	Train Driver
	<i>Consistency and reproducibility for medical practitioners</i>	An ORR-recognised occupational health doctor
	<i>From my perspective, not sure what benefits it brings</i>	TOC
	<i>Uniformity with regards to medicals & the medical checks undertaken.</i>	Other - Individual Response
	<i>TDLCR promised a lot but in reality, hasn't delivered in its current format.</i>	FOC
	<i>Reduction in the number of years between medicals and a more stringent medical standard.</i>	FOC
	<i>It's just created more red tape and more required documents for drivers to carry.</i>	Other - Driving Standards Supervisor
	<i>From an operator's perspective we have seen no benefits.</i>	TOC
7. Do you think TDLCR has brought about disbenefits?	<i>Operators have raised that there has been an additional cost and administrative impact of maintaining licenses, particularly on larger organisations. This is a particular issue with the impact of the additional medical examinations required after the age of 55, operators have raised that the yearly medical is not seen to be a safety benefit and should be conducted on a risk basis instead.</i>	Railway Industry Body
	<i>We believe that the TDLCR have brought in a new level of administrative burden that is not welcome in financially difficult context the railway system finds itself in. As far as training is concerned, train operating companies are being asked to train features of the system that are not necessary and add to costs. The medical requirements take no account of the general population living longer and healthier lives. The</i>	Railway Industry Body

	<i>TDLRC goes against the recommendations of the Social Mobility Commission in that it does not encourage engagement with schools due to the minimum age to hold a licence being 20.</i>	
	<i>Costs of having to have a full Train Driver training organisation sign-off just for traction training. This can also decouple the main Train Operator competence system somewhat as we are aware that when new trains come in, some TOCs use outside trainers to do "static training" on the traction as the contractors are the experts with it, then to satisfy TLDCR have to sign it off themselves afterwards even though they may not be the best place competence-wise to do so.</i>	A FOC
	<i>Only in so much as the loss of clarity around the validity of European Train Driving Licence Medical Fitness requirements on the GB mainline rail network. We have a Driver who previously could drive on the {redacted} using their European Train Driving Licence. We have been advised that the medical fitness requirements may differ from those contained within RIS-3451-TOM and as such this Driver would need to undertake a GB medical to the RIS.</i>	Other - Heritage Railway Operator
	<i>As mentioned previously, the administrative burden, knowledge requirements for rolling stock and the unrealistic medical requirements drive in unnecessary costs to the industry. This results in too much "paper" chasing including a never-ending supply of photographs and signatures.</i>	A Railway Industry Body
	<i>Removal of control from a TOC point of view. Added an additional layer of communication that isn't really beneficial. It is creating duplicate work for us to be contacting ORR as and when we withdraw the license and things getting missed. TOC do all the work for ORR including issuing the C of C, initial application etc. Administrative impact – not automated, lots of paperwork requirements Risk between what's known locally and centrally – communication and speed of that information getting through Communication via ORR and TOC via email – how do we know its been received and actioned. Staffing levels within ORR – impact on speed of response It doesn't add a lot of value in real terms for the effort of completing the paperwork. A plastic license is just a place holder for competence. The counterpart certificate is issued by the competence establishing company and is the component that adds the value to the company's safety procedures.</i>	A TOC

	<i>It's increased the admin burden, and cost release for driver through changes in medical frequency</i>	A TOC
	<i>Administration workload, costs increased with medicals</i>	A TOC
	<i>Competent drivers (unlicensed) are at a disadvantage through the requirement to resit Psychometric testing after 5 years</i>	A TOC
	<i>The is a cost implication regarding medical frequency</i>	A TOC
	<i>{redacted} members believe that the age-related medical examination element should be reviewed, as noted above, to an age later than 55. In part we suggest this because of the issues of cost, administration and impact on performance associated with annual medicals being booked for drivers over age 55. The cost of the medicals is additional to the lost time related to having to attend for the medicals, time spent travelling to and from the medical centre and the administration of the system. We understand that each medical costs around £1,000, a sum that increases when additional factors such as paid time, etc, are added. We estimate that each medical actually costs between about £1,200 and £1,500 and with hundreds of drivers requiring annual medicals, the cost to the industry must be in the hundreds of thousands of pounds each year. We have also highlighted issues of the availability of information for staff seeking to move to other operators (see Question 6). To overcome this problem, we would propose a GDPR compliant database that could contain relevant information about competencies, etc.</i>	Trade Union
	<i>Increased workloads</i>	A TOC
	<i>There is an additional level of administration required that is disproportional to any benefit it may provide</i>	Other - Professional Head of Operational Safety
	<i>Some regulations are too weak and others debar capable and fit drivers.</i>	Trade Union
	<i>As above - made the resource pool of Driver Managers and Trainers scarce, therefore driving up costs. Also the registered ORR Dr approach limits the resources available from a OH provision standpoint.</i>	A TOC
	<i>Having said that about the benefits there is a perception from older in-service drivers that the new drivers are more flexible now & more open to support the company & we have less knowledge about dealing with faults & failures of</i>	Train Driver

	<i>trains thus more willing to move a train in circumstances where an older driver wouldn't.</i>	
	<i>Without doubt the administrative processes can be improved as they are far too time consuming. Increased medical frequencies have also added additional cost in terms of release without offering much by way of return. It's not clear that this increased frequency is justified, particularly with people generally living longer</i>	A TOC
	<i>Increased red tape and costs as previously explained</i>	A TOC
	<i>The fact that you can move from driving an OTM to a 1600 ton train as soon as you are newly qualified</i>	Other - Driving Standards Manager
	<i>Some parts of TDLCR was clearly to satisfy EU Directive. Suggest a review of the aims and purpose.</i>	Other - Rail Consultant
	<i>More detail should be encoded in clearly linked guidance documents.</i>	An ORR-recognised occupational health doctor
	<i>managing the processes, keeping ORR up to date is a lot of work.</i>	A TOC
	<i>I've accepted the work that needs to be done to update the ORR with Driver changes of address, medical data & leavers. It is a necessity & we have adapted our systems to help me to be able to report to you</i>	Other - Individual response
	<i>Frequency of medical exams has caused quite a lot of disruption in comparison with the previous standard</i>	A FOC
	<i>Resource - considerable resource is required to comply with the regs from an administrative perspective, from checking data to updating ORR TDL team on changes. It also requires considerable volumes of data to manually managed as LNER systems don't link with ORR systems. There is also considerable double data handling (the same data is handled by you/ then us and vice versa). This is grossly inefficient for both organizations. Also, due to limitations with the ORR system, renewals are having to be made on paper-based application forms, again this is ridiculous in this day and age and also increases the risk of data entry errors when processed by the ORR. Financial - medical periodicities have been compressed meaning that drivers require medical more regularly than they historically would have done. This entails substantial cost from a release from duty perspective and also for the medical itself. {redacted} do not have any evidence from the period before TDLCR that medical periodicities were too long and in consequence risked unfit</i>	A TOC

	<i>drivers driving on the mainline. Whilst the train driving certificates side of things doesn't increase cost to us as it is essentially an extension of a normal certificate of competence, I am sure producing the plastic licence must be extremely costly.</i>	
8. Overall, do you think that TDLCR is achieving its aim of introducing common standards for train drivers?	<i>The development of the certificate has been an aid to achieving common standards, however, we would like to take this to the next stage through digitalisation which, currently, is not allowed.</i>	Railway Industry Body
	<i>The standards are being driven by ROGS and the proactive inspection of the Safety Certificate requirements by ORR rather than from TLDCR. The RSSB guidance achieves far more in our view because the TLDCR standards are a very basic framework. Also, the TLDCR framework can generate a false sense of security.</i>	A FOC
	<i>Although there has been no impact in terms of improving the standards and competence of train driving, there has been a small benefit in the adoption of company certificates. Railway Undertakings have worked together in making sure that these certificates are designed to make it easier for railway undertakings when a train driver changes from one company to another. The preemployment checks for licence application has also made the process more systematic. A move to digital certificates would assist in driving further benefits.</i>	Railway industry Body
	<i>I believe that there are aspects open to either misinterpretation or different interpretation. This is visible when discussing with colleagues from other OH providers and when reviewing old OH records of drivers when taking over a contract. In addition when taking over a new TOC its clear that there is differing advice given to them by different TOCs. Further clarity is needed</i>	An ORR-recognised occupational health doctor
	<i>The apprenticeship standard has largely superseded any work the TDLCR had aimed to achieve and is more up to date and regulated. The qualification is now in this standard and there's a more robust method of establishing competence on a UK standardised formal qualification.</i>	A TOC
	<i>consistent medical frequency, consistent license issued, same database used for every UK driver, application process.</i>	A TOC
	<i>Most stands across operators were fairly common for the training, assessment and licensing of drivers prior to the TDLCRs</i>	A TOC

	<i>Standards for the obtention of the driving licences. But the standards of the complimentary certificate are not standardised across the different TOCs.</i>	A TOC
	<i>Introduced common standard for issuing the licence after Part A of training is complete.</i>	A TOC
	<i>Other standards covered industry adequately prior to TDLCR so no material gain from introduction</i>	A TOC
	<i>I have answered no. Perhaps if as a country we were still in the European community, but I have seen no evidence to reflect a "common ground" we still all have different rules and signalling!</i>	A TOC
	<i>TOCs/FOCs have very differing SMS & company instructions since the RSSB allowed the rule book to be reduced. This is the main change to TOCS/Drivers not the licence system</i>	Driver Manager
	<i>TDLCR does not change the fact that every GB train operator works differently in terms of its training set up whilst the standards for drivers can be interpreted and applied slightly differently. In our view, each operator is a little island with different ideas on the subject and different people at different levels and parts of the employing organisation pushing different perspectives. TDLCR does not standardise these differences. Our members draw comparison with the DVLA driving license which is standardised across the UK.</i>	Trade Union
	<i>Uniformed process to inform the ORR on updates to Train Drivers information</i>	A TOC
	<i>The current standards were suitable and have remained in place in order to meet the requirements of ROGs Reg 24 and ORR RSP1, and the introduction of the TDLCR has not had a significant impact on these</i>	Other - Professional Head of Operational Safety
	<i>I am friends with drivers in other TOCS. Although it was clear entry requirements were the same training experiences and routes to getting qualified seemed very different. Someone was qualified in half the time it took me however I work for a bigger company.</i>	Train Driver
	<i>There is a general consistency of approach in terms of recording competency through certification and this makes the movement of drivers a bit easier to manage in terms of identifying transferable skills / competence.</i>	A TOC
	<i>If you manage your operations to recognised procedures and the applicable RIS then you do this anyway without the need for licensing</i>	A TOC
	<i>I am currently booked off as "unfit to drive trains" because of the corrective lens strength limits imposed by the TDLCR. 20 years without a</i>	Other - Train Driver

	<i>vision related safety of the line incident and I'm now unfit!!!</i>	
	<i>everyone now knows what is required to be a train driver and what competences they have</i>	An ORR-recognised trainer/examiner
	<i>Needs more impact and control over those who control certification once licence is held.</i>	A Trade Union
	<i>All candidates and organisations know the process and therefore helps to create an open and standardised recruitment process.</i>	An ORR-recognised occupational health psychologist
	<i>As previously explained</i>	Other - Rail Consultant
	<i>Consistency of decision-making particularly for exclusion on medical grounds.</i>	An ORR-recognised occupational health doctor
	<i>Re physics polarised braking mentality and complete lack of understanding what 6 percent g braking actually means in areas of good adhesion. The Salisbury crash, the driver was braking at the 6 percent g point as part of intuition. The middle of leaf fall, falling gradient tree lined track, therefore no understanding of static friction and braking performance. The driver used emergency after 5 seconds. When you consider it takes 3 seconds for the brakes to fully function 2 seconds are left. How can you assess if the anti-skid system is going to do the job.</i>	Other - Retired Train Driver
	<i>each company does everything differently so the fact they have a licence is just showing they are a qualified driver but doesn't give any indication of their level of knowledge and the particular details. For example, they may not do absolute block but applying to a depot that does only AB working. Also found that the levels of competence of a competent driver vary hugely - competence to show they hold a licence and certificate does not necessarily meant their knowledge is good as relies on the assessors.</i>	A TOC
	<i>We know what constitutes as high blood pressure for the & have a clear understanding of the eyesight standards expected. It has brought train driver training into line so the standards are the same across all TOC's & FOC's.</i>	Other - Individual response
	<i>Common standards existed previously and have continued to be applied.</i>	A FOC
	<i>It's aiding in the transfer and recruitment process and streamlines competency management.</i>	A FOC
	<i>I'm not sure how a common license promoted common standards. The two are not necessarily conversant.</i>	Other - Driving Standards Supervisor

	<i>The standards are pretty much the same (apart from increased eyesight requirements) as what they were prior to TDLCR, therefore they have not added any common standards that weren't there previously.</i>	A TOC
9. Overall, do you think that TDLCR is achieving its aim of creating a more flexible labour market for train drivers?	<i>We believe that the TDLCR restricts the labour market for train drivers by having the minimum age for train drivers to hold a licence at 20. A reduction to 18 years of age would facilitate better engagement with schools and could lead to more pathways into the train driving grade.</i>	Railway Industry Body
	<i>The need for specific Route and Traction knowledge is a major issue when recruiting in GB. If recruiting a qualified Driver, one looks for a Driver with Route and traction knowledge plus the appropriate level of experience rather than a newly qualified person. The Train Driving Licence is just the qualification basics, and we do not, cannot, rely on Route and Traction records in the TDLCR records so seek to check that in other ways anyway.</i>	A FOC
	<i>Railway Undertakings do not believe that TDLCR has achieved its aim of creating a more flexible labour market. Prior to leaving the European Union, a small benefit, could be realised as the licence of a European railway driver was recognised as valid, however, this is now not possible.</i>	Railway Industry Body
	<i>No. Movement is still controlled by contracts of employment. The {redacted} form is still the vessel used by train companies to understand driver SOL performance.</i>	A TOC
	<i>degree of training required remains unchanged.</i>	A TOC
	<i>There was already movement between operators which was managed through RIS3751</i>	A TOC
	<i>Not part European Union, even when we were part of EU we didn't see much movement with drivers</i>	A TOC
	<i>No tangible impact with unlicensed mainline drivers at a disadvantage therefore recruitment made more problematic for the company</i>	A TOC
	<i>Have seen no change.</i>	A TOC
	<i>Our members believe that the creation of a more flexible labour market for train drivers has not been created by TDLCR but by a lack of sufficient people trained in this role. Consequently, an opportunity has been created for Individuals to find better salaries and conditions in other companies once they have completed their training with their original employer. In addition, the License is not flexible because whilst a driver can retain Part A, some employers do not permit them to carry Part B to</i>	Trade Union

	<i>their next company. On this basis, a number of employers have no information about a driver in relation to areas such as: competencies; safety of the line incidents involving the particular driver; any medical issues that have affected the Individual; what roads they have been signed for; or the traction knowledge that they have achieved. Consequently, driver managers have advised us of incidents in which applicants for posts have claimed to have had experience and competency in areas that they haven't (e.g., false claims about having driven diesel trains when in reality have only operated third rail; not used to overhead wires; never operated where semaphore signals are still in use, etc) requiring additional training after the person has been taken on.</i>	
	<i>(Redacted) has not seen any improvement in this area</i>	A TOC
	<i>Train drivers were able to move between UK operators prior to the introduction of TDLCR, and the requirements of RIS-3751-TOM were and have remained suitable to manage this</i>	Other - Professional Head of Operational Safety
	<i>I think it's achieving its aim of ensuring the market for safe drivers with the natural ability to concentrate. So few being able to meet the standard ought to be viewed as a positive least we suddenly want more people being in charge of trains full of thousands of people who've been able to pass the test because the standard was lowered? I certainly would not have anyone in my driving cab who I knew didn't undertake the same standards as & colleagues. Not to mention the cost of training for them to get all the way to the end & fail or do something unsafe?</i>	Other - Train Driver
	<i>Although some of the core competencies are transferable, there are still numerous differences between the competence requirements from one operator to another, especially between passenger, freight and on track machine operators.</i>	A TOC
	<i>I am currently booked off as "unfit to drive trains" because of the corrective lens strength limits imposed by the TDLCR. 20 years without a vision related safety of the line incident and I'm now unfit!!!</i>	Other - A train driver
	<i>I do not think it has altered the labour market within the UK specially within the passenger toc network</i>	Trade Union
	<i>Yes. It could be argued that the 2 'fails' is restrictive, however it is there for safety and the UK has not had a major accident for years, compared to European operators who have had</i>	An ORR-recognised occupational

	<i>some. I also feel that it is age appropriate and therefore lowering this standard could have an impact on what is a very good safety record within the UK.</i>	health psychologist
	<i>Yes very much so however trying to keep drivers is very difficult due to the nature of some companies terms and conditions</i>	Other - Driving Standards Manager
	<i>The answer is from a safety and security perspective. I can see how it could be argued that TDLCR is a barrier.</i>	Other - Rail Consultant
	<i>Not my field of expertise.</i>	An ORR-recognised occupational health doctor
	<i>from discussions with colleagues, the fact a person is a licence holder means very little. No comfort in other companies keeping ORR updated with issues either.</i>	A TOC
	<i>It probably makes it easier for Drivers to prove they are a qualified train driver by providing an ETDL number & licence for checking by TOC/FOC HR's/Recruitment Department. The train Drivers at my company have had little to do with the application process for their first issue ETDL's & have little to do when their licence is ever lost or stolen.</i>	Other - Individual Response
	<i>As a company we employed a number of drivers from Europe using the system however this was off set by drivers who left under discipline gaining employment in another RU</i>	A FOC
	<i>From anecdotal evidence, Train Drivers feel their route knowledge and traction knowledge is more clear to them, via certificates, therefore Drivers feel more comfortable seeking opportunities with clear vision of their competencies.</i>	A FOC
	<i>I have not experienced any change in the labour market within the OTM industry from this alone.</i>	Other - Driving Standards Supervisor
	<i>No. There is generally a one-way flow of drivers within the UK, from the lower payer TOCS to the higher paying ones. So for example, a driver starts with GTR who have lower paid drivers than {redacted}, so therefore they are more likely inclined to apply for jobs with us. TDLCR doesn't assist in this movement, it just adds work to do at both operators in terms of admin advice to ORR.</i>	A TOC
10. Overall, do you think that TDLCR is achieving its aim of making it easier for cross border rail services to operate (including	<i>We do not operate outside of GB so cannot comment on this.</i>	A FOC

the changes in place after 31 January 2022)?		
	<i>There's a lack of clarity on the validity of Euro medicals for use on the GB network.</i>	Other - Heritage Railway Operator
	<i>The requirement for cross border train drivers, such as those employed by Eurostar UK, to have to be issued with two Licences, one European and one UK, is an unnecessary burden. It undermines the creation of a level playing field with road as currently truck and car drivers driving licences are covered by mutual recognition.</i>	Railway Industry Body
	<i>Post Brexit it was easier to confirm fitness for cross border drivers because the standards were the same. Jan 2022 amendment makes it easier for EU drivers operating in the Channel tunnel zone, no impact on UK drivers yet , I'm still having to issue certificates for EPSF for UK drivers operating in the Channel tunnel zone I .foresee potential difficulties for medical assessment for those cross-border drivers operating outside of the channel tunnel zone if the medical standards between EU and UK diverge. In addition EU and UK drivers likely to be subject to differences in employment law which will prove challenging for companies to manage. Re-instatement of mutual recognition of respective UK and EU medical assessments for ALL cross-border drivers would be preferable for cross border TOCS and medical assessors!</i>	An ORR-recognised occupational health doctor
	<i>Good current common approach to health standard but this may diverge from the continental approach in years to come.</i>	An ORR-recognised occupational health doctor
	<i>Even though, there is no cross recognition, the fact that you have an equivalent standard framework is helpful for cross border rail services to operate.</i>	A TOC
	<i>Company does not operate cross border so can't comment</i>	A TOC
	<i>Does not impact on my TOC/RU</i>	A TOC
	<i>we are not a cross border operator and therefore the operation of cross boarder services is not applicable to most UK operators</i>	Other - Professional Head of Operational Safety
	<i>I am currently booked off as "unfit to drive trains" because of the corrective lens strength limits imposed by the TDLCR. 20 years without a vision related safety of the line incident and I'm now unfit!!!</i>	Other - A Train Driver
	<i>I will not be dealing with this matter</i>	Trade Union

	<i>I have been involved with this challenging project as a result of Brexit, however it was achieved successfully. It's not easy to ask an existing Train Driver to re-sit the psychometrics, however I'm not sure how else you would assess the competencies required to satisfy the TDLCR requirements, that would be fair and standardised across the affected organisations/Individuals.</i>	An ORR-recognised occupational health psychologist
	<i>Don't have evidence for this but would assume so</i>	A TOC
	<i>No comment to make on this as have no experience or knowledge of the impact, sorry</i>	Other - Individual Response
	<i>Prior to January 2022 UK issued licenses were valid as far as Calais Frethun but after the UK left the EU we had to obtain licenses from {redacted} for our drivers to operate. The 10.9 (a) accord will address this however until then we have the issue of our drivers having two licenses (UK & France)</i>	A FOC
	<i>Prior to the 2022 changes we were able to bring some colleagues from various entities within Europe and it was a success. We also operate through the tunnel and have some dual licence holders, as there is still a good level of consistency between the licences this helps both ways in terms of ensuring we meet requirements to operate on the French network.</i>	A FOC
11. Overall, do you think that TDLCR is achieving its aim of increasing public confidence in the rail system through the statutory licensing of train drivers?	<i>I don't believe the public have any awareness of TDLCR. The activity of ORR's Safety Inspectors and the {redacted} and the {redacted} campaigns appear to have the most impact on public confidence in rail safety.</i>	A FOC
	<i>Railway Undertakings are sure that the public are in favour of the licensing of train drivers, however, it has no impact on how Railway Undertakings manage the competence of train drivers.</i>	Railway Industry Body
	<i>not sure the public are generally aware</i>	An ORR-recognised occupational health doctor
	<i>Would the public really understand the licence process, I am not so sure. They would expect that a driver is competent to drive their train, how that is achieved is pretty irrelevant to the day to day customer</i>	A TOC
	<i>Are the general public aware?</i>	A TOC

	<i>I am not sure this has had any impact on public confidence as they would not of been aware of processes in place prior or now</i>	A TOC
	<i>Very little publicity or marketing so majority of public are probably unaware of the system</i>	A TOC
	<i>The public is unlikely to be aware of the TDLCR</i>	A TOC
	<i>Passengers in a train have not knowledge about the TDLCR system or whether their driver holds a statutory license.</i>	Trade Union
	<i>Unsure if the public are aware of TDLCR</i>	A TOC
	<i>The public will assume that train drivers' licencing is regulated in any case. That it is through these regulations is not widely known.</i>	Trade Union
	<i>It's unlikely that the vast majority of the public are aware of these licencing requirements or what is involved in obtaining one, or how risk / competence is managed outside of the requirements.</i>	A TOC
	<i>I doubt most of the public know anything about driver licences</i>	A TOC
	<i>I am currently booked off as "unfit to drive trains" because of the corrective lens strength limits imposed by the TDLCR. 20 years without a vision related safety of the line incident and I'm now unfit!!!</i>	Other - A Train Driver
	<i>I am not sure that the General Public are aware of the licencing requirements for Train Driving</i>	Trade Union
	<i>Most people outside of the industry have never heard of TDLCR</i>	Other - Member of the Public
	<i>When I speak with people outside of the railways, they are always very surprised to hear the lengths a driver has to go to obtain a license, and the fact that they have a license. Therefore I don't feel that the general public are aware of this, yet alone have confidence in this.</i>	An ORR-recognised occupational health psychologist
	<i>Very few members of the public realise that there is a TDL</i>	Other - Driving Standards Manager
	<i>The public are unaware of the existence of TDLCR they just assume there are proper standards in place</i>	An ORR-recognised occupational health doctor
	<i>Believe public confidence same as likely public unaware of the impact</i>	An ORR-recognised occupational health doctor
	<i>public don't know about it and if they did, would expect it to be like car driving licence.</i>	A TOC
	<i>I'm not sure that the wider public have any idea as to the TDL's.</i>	Other - Individual Response
	<i>I don't think the travelling public are aware of the initiative</i>	A FOC

	<i>I don't believe the public are aware of Railway undertakings, licensing, training....etc</i>	Other - Individual Response
	<i>Would be interested to think what the public think/ know about the subject!</i>	A TOC
12. Are there aspects of TDLCR which would benefit from new or amended industry standards to assist with compliance? (for example, the RSSB Railway Industry Standards ('RIS') which cover topics such as medical fitness requirements, amongst others)	<i>{redacted} have initiated a review of the medical fitness standards (RIS-3451-TOM Train Drivers – Suitability and Medical Fitness Requirements, issue 1; RIS-3452-TOM Train Movement – Medical Fitness Requirements, issue 1; and GOGN3655 Guidance on Medical Fitness for Railway Safety Critical Workers, issue two) to ensure these align and do not contradict the contents of TDLCR. Some requirements in TDLCR are now more restrictive than previously, and therefore any content of the RSSB standards is expected to change to align with TDLCR and provide guidance on these. From an {redacted} perspective, it would be useful to understand if there are any likely planned changes to the medical fitness legislation and requirements within TDLCR so that this can be taken into account for the RSSB standards review. Industry queries raised around colour vision requirements for drivers, and whether 'sufficient colour vision' is enough for drivers to be safe to drive currently contradicts the legislative requirement that drivers must have 'normal' colour vision – therefore further guidance from the ORR on what normal means in this case would be helpful, or an understanding of whether this element of the legislation is likely to change in the future would be of use to the RSSB review and potential future research or work looking into alternative tests. The directive and regulations refer to alternative colour vision tests, but provide no guidance on what alternative tests could be acceptable or approved. This needs to be clarified.</i>	Railway Industry Body
	<i>We believe the industry should be in more control of the detail required to underpin the licence and certificates issued to train drivers. These would include all aspects of the recruiting process such as minimum age, medicals, competence and training requirements</i>	Railway Industry Body
	<i>I believe RIS's may help with assisting roles and responsibilities, along with coming to a common understanding.</i>	HM Railway Inspector
	<i>The TDLCR is already supported by ORR guidance and RSSB guidance applies to practical elements.</i>	A FOC

	<i>Clarification around the exemption of Drivers on the GB mainline Railway and also the suitability of validity of medical fitness standards from holders of European Train Driving Licences</i>	Other - Heritage Railway Operator
	<i>The change to a "Goal Setting" regulation, as stated earlier, would enable the industry to coalesce around industry standards in order to make sure that the Railway Industry was always up to date with the latest thinking. Examples of this would include, the medical standards were highlighted in this section as being required to be modernised to be in line with the general population living longer and healthier lives. It was noted that the age in which the state pension and railway pension schemes are collected is now later in recognition of this, however, the frequency of medicals has not been changed. Another example would be around the curriculum for training new entrants to the train driving grade which would be more appropriately handled by the {redacted}.</i>	Railway Industry Body
	<i>My understanding is that the ORR does not have a Medical Advisor. In the absence of this RSSB industry guidance is imperative</i>	An ORR-recognised occupational health doctor
	<i>I believe the annual medical at 55 needs address. In this current fitness climate 55 is too young for such a strict regime. How do we capture older drivers and cognitive ability as drivers get older (over 65+), part time working means less time in the seat how do we capture this within licence arrangements More clearer guidance on application of the regulations More explicit on advice when requested from ORR – black and white answers rather than emphasis been placed back on TOC to manage within their safety certificate - Covid being a good example</i>	A TOC
	<i>New train drivers would benefit from being trained consistently under the RDG driver training schedule (part A / B process - part B being company specific)</i>	An ORR-recognised trainer/examiner
	<i>Medical fitness, as where drivers may be able to continue with reasonable adjustments when they are unable to meet some of the fitness criteria, but can demonstrate they can drive safely</i>	A TOC
	<i>A common framework regarding the standards of the complimentary certificate.</i>	A TOC
	<i>Frequency of medicals - revert back to every 5 years rather than 3. Experience of drives when applying for DTM or instructor grades removed</i>	A TOC
	<i>Industry standards are/were fit for purpose pre TDLCR so TDLCR is the addition, rather than standards needing to be amended</i>	A TOC

	<i>I know of no checks made by the regulators to check Individuals or TOC/FOCs are complying with the TDLCR</i>	A TOC
	<i>Medical requirements feel excessive, especially the annual medicals for our older drivers. Annual medicals should really be reserved for those beyond retirement age.</i>	Other - Driver Manager
	<i>We have highlighted a range of issues in previous answers including around medicals, safety of the line incidents, medical restrictions, etc. We believe that there should be a database set up which would give access to the records on each driver in respect of the information described in the previous sentence and which companies could have access to when appointing staff (but noting the GDPR issues and the requirements for consent to be given).</i>	Trade Union
	<i>Frequency of Train Driver Medicals too excessive. Revert to RIS 3451</i>	A TOC
	<i>The medical requirements in the TDCLR should be reviewed, as the prior arrangements to 2010 were suitable for the UK, and the change to more restrictive medical frequencies have imported significant cost to UK rail. Therefore the TDLCR should be reviewed alongside the industry standards (RIS) for medical fitness and recruitment and selection</i>	Other - Professional Head of Operational Safety
	<i>I can understand two lifetime attempts maybe considered too harsh. How about as a compromise an amendment to say every 5 or 10 years. That said what do the experts think? Can the human natural ability to concentrate change/develop?</i>	Other - Train Driver
	<i>Medical fitness standards would benefit from a review recognising that people are generally living longer / healthier. As a contentious point, there could maybe be more stringent psychometric / cognitive testing requirements for qualified drivers at specific points (age based and / or as part of ongoing recruitment). Testing standards could also be more tailored to meet the demands of specific operators (e.g. long distance inter-city driving has different cognitive demands to suburban driving etc).</i>	A TOC
	<i>If licensing is to remain it needs the industry to adopt IT systems that make the processes involved simpler and enable transfer of information between companies (GDPR dependent obviously). Greater recognition within standards would also be of benefit</i>	A TOC
	<i>I am currently booked off as "unfit to drive trains" because of the corrective lens strength limits imposed by the TDLCR. 20 years without a</i>	Other - A Train Driver

	<i>vision related safety of the line incident and I'm now unfit!!!</i>	
	<i>Change always prompts confusion, it was hard to manage medicals when the licences were being introduced, I would not favour anything suggested by the {redacted}</i>	Trade union
	<i>I've used the RIS-3751-TOM since it's introduction in 2013 and as such I've not had a need to recommend any changes.</i>	An ORR-recognised occupational health psychologist
	<i>This would be raising a level of unnecessary detail as it is overlapping other systems mandating compliance as group members.</i>	Other - Rail Consultant
	<i>Yes, I think there is need for much updating of medical fitness standards and guidance - new developments in diabetes management (e.g. CGM system for type 1 DM), clarification about how often to monitor BMs in types 1/2 DM, the guidance on laser eye surgery, OSA assessment and combined threshold of increased risk to be agreed, clarity about how to assess cardiovascular risk of sudden incapacitating events AND ideally an enshrined level of acceptable risk that we are working to (AKA DVLA clarity of 2/20%)</i>	An ORR-recognised occupational health doctor
	<i>As a medical practitioner I would value the ability to refer to wider standards as offered by RSSB particularly anybody for dealing with valid appeals against medical decisions.</i>	An ORR-recognised occupational health doctor
	<i>SI 1798 basic principles of physics is not applied, so why bring in more amendments when you fail on existing.</i>	An ORR-recognised occupational health doctor
	<i>Clarity on what the Driver needs to do on leaving or starting at a TOC. I have Drivers who we applied for in 2013 that have left us 3-4 years ago & it's hard to know whether they left to go elsewhere or have left the industry altogether</i>	Other - Individual Response
	<i>Definitely need to address medical standards.</i>	A FOC
	<i>RIS 3451 should be withdrawn. TDLCR Schedule 1 should have meaningless requirements removed e.g. "ability to withstand dazzle". Guidance on TDLCR schedule 1 hearing and vision requirements, currently in RIS 3451 should be placed in ORR publication "A guide to the occupational psychological fitness and medical requirements - Train Driving Licences and Certificates Regulations 2010"</i>	An ORR-recognised occupational health doctor
	<i>Yes, there needs to be clear medical standards governing rail drivers like there are for DVLA. At present, there are some doctors who will let people with epilepsy drive after 6-12 months which should not be allowed. The current</i>	An ORR-recognised occupational health doctor

	<i>standards are open to interpretation and there is varying practice.</i>	
	<i>There should be an industry standard for post incident management. Expiry of safety critical incidents with timescales. Drivers can learn from incidents and there should be a long-term positive outcome. Incidents in my opinion should not remain on a drivers record indefinitely.</i>	A TOC
	<i>There are already guidance notes for TDLCR.</i>	A TOC
13. [only complete this question if you are an organisation with under 50 employees] Do you think that TDLCR has had a disproportionate impact on your business?	<i>It makes it more costly and difficult to obtain traction training for Drivers we recruit, and offers very limited benefit if any.</i>	A FOC
	<i>But it could. If the {redacted} were to lose it's exemption the process could be considered a challenge and a mechanism would be required whereby existing Drivers under the present exemption requirements would be permitted to continue to driver trains for the {redacted} on the limited part of the GB mainline network that {redacted} trains operate over.</i>	Other - A Heritage Rail Operator
	Just involves a little more admin.	A TOC
	The burden of administration has been significant. This has included development of a TDLCR standard, revision of company processes, briefing and training to staff, increase in workload resulting in additional headcount to manage the administration of licences and information returns	Other - Professional Head of Operational Safety
	Again some of the larger companies poach staff	Other –Driving Standards Manager
	Driver competence and training in both systems, processes and applications shifted to core training providers (specific centre licence status) and branded electronic technology.	Other - Rail Consultant
14. TDLCR does not cover non-mainline operations, such as London Underground. Do you think that non-mainline operations should	With the caveat that it does not adversely impact yards/depot/sidings operations.	HM Railway Inspector

be covered by the regulations?		
	In principle there is no strong objection, other than to say to a large degree we use volunteer drivers on {redacted} with ad-hoc availability. Establishing a training school and managing the processes required by the TDLCR would increase costs for marginal benefits. There is a risk that should TDLCR be applied to heritage railways generally many would be forced to closed as their standards may differ from those applied to the mainline railway.	Other - Heritage Railway Operator
	<i>Whilst operations may be different, railway hazards and risks are similar. IMO it would be advisable to have the same medical standards</i>	An ORR-recognised occupational health doctor
	<i>Admin burden is too great to include engineering depots etc</i>	A TOC
	<i>Yes, where there is clear interface with Main Line operations. Purely isolated privately owned operations could be exempt.</i>	A TOC
	<i>I believe the current system works fine. Non-mainline operations have sufficient medical standards appropriate to their own specific risks.</i>	An ORR-recognised occupational health doctor
	<i>Different skill set and requires additional knowledge with route competence for example</i>	A TOC
	<i>TDLCR has prevented the free movement of drivers for our company</i>	A TOC
	<i>Level playing field</i>	A TOC
	<i>Our members report applications for GB Mainline driver posts from drivers employed by {redacted} and {redacted}. Their feedback highlights how different the National railway is when compared to these systems (especially {redacted}) in terms of the differences between heavy and light (tram based) rail, signalling systems, the ethos of how the systems are managed and operated, etc. We are advised that a considerable amount of training is required to bring non mainline railway staff up to the National railway standard.</i>	Trade union
	<i>TSP Depot Drivers should be covered under TDLCR due to the high-risk nature of Depots</i>	A TOC
	<i>Maintain consistent high standards across the whole industry and allow movement of drivers between operators.</i>	Trade Union
	<i>it could be useful should a non-mainline train driver apply for work on the mainline railway, you could have a situation where a bad apple with poor safety record gets a job as a trainee, should this information be recorded via TDLCR it would prevent already sub-standard drivers joining a mainline company with a clean record</i>	Trade Union

	<i>Infrastructure can be shared</i>	An ORR-recognised trainer/examiner
	<i>I think it would be good to have some sort of standards for these operators given the {redacted} crash a few years ago.</i>	An ORR-recognised occupational health psychologist
	<i>This question has wider implications on scope of ROGs. The principle on licensing should apply to all because there is a value in TDLCR requirements. Many primarily see it as simply an EU requirement.</i>	Other - Rail Consultant
	<i>Where the role demands from a hazard/risk aspect are comparable I would recommend that the same are applied for similar roles across the board.</i>	An ORR-recognised occupational health doctor
	<i>to have a similar impact</i>	An ORR-recognised occupational health doctor
	<i>Including tramways i.e. off road operations such as {redacted}</i>	Other - Retired Train Driver
	<i>transferable risks and skills</i>	A TOC
	<i>If their Drivers can join another TOC or FOC as a Qualified Driver they should be able to prove they are a Qualified Driver & have met the same standards as a Driver for any other TOC. The {redacted} is always contentious as they are only qualified to Drive on the {redacted} & not mainland {redacted} services. They still undertake rules exams & attend medicals</i>	Other - Individual Response
	<i>not sure. Having worked for {redacted} for many years in a medical capacity, it was much easier there to create medical standards that reflected the work environment, allowed bespoke risk assessment for those with disabilities and allowed innovative and progressive thinking around occupational health. Having to obey the TDLCR would have hampered that approach. However, that approach is not consistently scalable to all TOCs given the variable quality of OH provision across the UK for rail as this approach relies on high quality, informed, evidence based occ health advice both at case and strategic level - not all TOCs have this level of OH provision. Until we have that, having absolute standards, even ones that are restrictive and risk averse, may be the safest option</i>	An ORR-recognised occupational health doctor
	<i>Given the potential for 'drivers' to move to and from the mainline railway a common approach would be beneficial.</i>	A FOC

	<i>The fitness requirements for {redacted} are different</i>	An ORR-recognised occupational health doctor
15. Overall, how has the full implementation of TDLCR affected your recruitment of new train drivers?	<i>We believe that that the TDLCR has had little effect if any on the recruitment of train drivers. It has meant that more train drivers are required owing to the increase in the frequency of medicals. The TDLCR does restrict the ability of school leavers to join the grade.</i>	Railway Industry body
	<i>We are not an ORR-certified train Driver training school so can only recruit already qualified Drivers from other operators</i>	A FOC
	<i>To some extent it's made life easier where they already hold the relevant licence and certificate. For the majority of our Drivers they are exempt from the TDLCR and as such the Regulations have had little or no effects to our operation.</i>	Other - Heritage Railway Operator
	<i>The TDLCR mandates the minimum age of train drivers holding a licence to be 20 years of age. This restricts the industry in connecting with school age leavers and is a constraint on social mobility. This age is also at odds with our European partners who can licence domestic train drivers at 18 years of age. A case for change for this item will be sent separately to both the ORR and the DfT. The frequency for medicals requires that train drivers must be released more often for medicals that prior to the TDLCR being introduced. This has resulted in the recruitment of extra train drivers.</i>	Railway Industry Body
	<i>Such high numbers of applicants for every job means that even with tighter controls its doesn't affect recruitment</i>	A TOC
	<i>Introduced some further administrative tasks.</i>	A TOC
	<i>Minimum age is restrictive. Reduced the number of occ health provides because they had to become registered</i>	A TOC
	<i>The system is currently admin heavy including the requirement to re-test psychometrics for non-licensed mainline drivers. There has been no apparent tangible benefit</i>	A TOC
	<i>Minor changes were needed to comply with the regulations</i>	A TOC
	<i>This option has been chosen because TDLCR has made recruitment easier in the sense that at least the employer knows the person is a qualified train driver but as other details may not be provided, that is the limit of its usefulness.</i>	Trade Union
	<i>No impact</i>	A TOC

	<i>New drivers won't have a licence and will need to be issued a licence – this is no different to pre TDLR</i>	Trade Union
	<i>We've had to recruit more train drivers in order to comply with the increased medical frequencies, this in turn has meant an increase in Driver Manager numbers in order to maintain driver / manager ratios and to manage an increased post-qualified assessment demand. The minimum age requirements for train drivers has meant that we are unable to explore the potential to tap into a key part of the labour market.</i>	A TOC
	<i>it has aided recruitment slightly by giving evidence of competence without having to chase the former employers for training records</i>	Trade Union
	<i>We are in a unique industry where we have a minimum standard for this recruitment of train drivers. As such we have become experts in this field and therefore can advise organisations as to the standard to support them with their recruitment. Candidates are also aware of the standards and therefore the recruitment is as transparent, fair and valid as it can be.</i>	An ORR-recognised occupational health psychologist
	<i>Not my field of knowledge.</i>	An ORR-recognised occupational health doctor
	<i>not involved in recruitment</i>	An ORR-recognised occupational health doctor
	<i>more paperwork and management processes</i>	A TOC
	<i>I haven't heard any feedback from our training centre or Recruitment Department. A lot of work is involved for applying for first issue licences. I can imagine that the train drivers joining us are pleased as they can move around & go where the money is once they are qualified.</i>	Other - Individual Response
	<i>We did manage to recruit a small number of drivers from Europe and their license helped somewhat</i>	A FOC
	<i>The ECG is pain to administer and also not clinically worthwhile. I would advise that this is removed from medical standards.</i>	An ORR-recognised occupational health doctor
	<i>We generally recruit trainee drivers and not already qualified.</i>	Other - Driving Standards Supervisor
	<i>It has not affected the recruitment process, it has added considerably to the admin burden following recruitment.</i>	A TOC
16. How has the full implementation	<i>Industry have raised that the requirements within TDLCR have in some cases led to drivers who</i>	Railway Industry Body

of TDLCR affected your retention of train drivers?	<i>were previously safe to drive, being declared unfit, and having to be redeployed.</i>	
	<i>The visual acuity requirements within the medical requirements have meant that train operating companies have lost competent train drivers. It is recommended that the detailed medical requirements be managed through a Rail Industry Standard.</i>	Railway Industry Body
	<i>The medical requirements, especially around visual acuity has resulted in train drivers having to leave the grade. The change to the medical requirements meant that on day one the train driver could drive a train and on day 2 they could not!</i>	Railway Industry Body
	<i>Drivers don't leave, low turnover</i>	A TOC
	<i>medical timescales changed to every 3 years</i>	A TOC
	<i>The TDLCR has no bearing on the retention of drivers. TOCs work in the same way, regardless</i>	A TOC
	<i>No noticeable change within our TOC/RU</i>	A TOC
	<i>It has not affected retention because the motivation for staff moving is that of gaining better pay, conditions and hours.</i>	Trade Union
	<i>No impact</i>	A TOC
	<i>Retention is based on the behaviour of the employer, remuneration package and quality of work – the licence is of little consequence.</i>	Trade Union
	<i>More stringent medical testing has, in a few cases, meant that drivers have failed a medical that they would once have passed. There may be a valid case for this but this is not clear. It's understood that the more stringent eyesight testing is because of higher speed driving requirements of some operators, particularly in Europe, that are not relevant to most UK operators.</i>	A TOC
	<i>I am currently booked off as "unfit to drive trains" because of the corrective lens strength limits imposed by the TDLCR. 20 years without a vision related safety of the line incident and I'm now unfit!!!</i>	Other - A Train Driver
	<i>I don not believe it has made any difference, I find quality of work (eg intercity work) and the distance they live from the workplace something that affects retention of drivers</i>	Trade Union
	<i>Due to larger companies trying to poach drivers directly</i>	Other - Driving Standards Manager
	<i>Not my field of knowledge.</i>	An ORR-recognised occupational health doctor

	<i>not involved in retention</i>	An ORR-recognised occupational health doctor
	<i>Recently there hasn't been a mass exodus of Drivers leaving us but we have had 3 years of good Pay Deals when perhaps other companies have frozen pay</i>	Other - Individual Response
	<i>Drivers will always have a desire to transfer to what they perceive as less stressful work but their ability to transfer tends to be decided on the transfer of safety critical information document rather than their license</i>	A FOC
	<i>I don't think this implementation has had any bearing on retention</i>	Other - Driving Standards Supervisor
	<i>No effects one way or another.</i>	A TOC
17. How has TDLCR affected your recruitment of train drivers from other operators?	<i>The standardisation of the certificate has helped in this area, it makes sure that consistent operational terminology is used. Train operating companies still carry out their due diligence procedures, however, no matter what is recorded on the certificate.</i>	Railway Industry Body
	<i>The main issue when recruiting is route and traction knowledge. As we are not signed off as a Train Driving training centre, we need to have existing traction knowledge which limits the available pool of Drivers.</i>	A FOC
	<i>The standardisation of the complementary certificate has been the change that has made a small benefit to recruiting from other operators. It is easier to see what level of knowledge in terms of route and traction has been gained by the candidate. Railway Undertakings, however, still must perform their due diligence checks and undertake a risk-based training needs analysis.</i>	Railway Industry Body
	<i>Has stopped applicants from light rail and trams, but again with the numbers we recruit this is not an issue</i>	A TOC
	<i>extra check now needed to confirm a license is held and still valid. Length of time taken to complete a check during recruitment.</i>	A TOC
	<i>The burden of admin coupled with the infrequency of the activity places additional time and cost into the process for transferring drivers. There is now a higher rate of admin errors due to the complexity and confusion that exists despite attempts for simplify this into flow charts, forms etc</i>	A TOC
	<i>can check credentials of candidates when applying for driver role</i>	A TOC
	<i>No issues with recruitment of mainline licensed drivers however TDLCR has impacted recruitment of non-licensed mainline drivers</i>	A TOC
	<i>It gives a starting point.</i>	A TOC

	<i>More robust way of checking Train Driver competence and validity.</i>	A TOC
	<i>There is an additional burden of admin due to the requirements for a certified copy of the certificate, the confusion at times with the complementary certificate, for both existing drivers leaving and transferring companies. The process and requirements under RIS-3751-TOM were suitable and this has layered additional requirements with no demonstrable benefit</i>	Other - Professional Head of Operational Safety
	<i>Having a known consistent set of standards and competencies helps but training to achieve the certificate for the new employer still needs a TNA and training.</i>	Trade Union
	<i>I know colleagues who have changed TOCS easier</i>	Other - Train Driver
	<i>It's now easier for a driver to provide evidence of current competency when moving company through certification. The ability to check the status of a licence is valued but the process could be more efficient and timely as stated above.</i>	Other - Train Driver
	<i>We have always insisted on getting a full history for driver's transferring into EMR and by having good relationships with other operators this has the most effect on getting information for recruitment purposes</i>	A TOC
	<i>again knowing the drivers competence has made life slightly more easier</i>	A TOC
	<i>From an assessment point of view it can be frustrating when candidates apply to numerous organisations at the same time, or when they apply to one company but with the aim of actually going to a different company. This can be difficult to manage and we as assessors have to be super vigilant to ensure a candidate is being assessed correctly.</i>	Trade Union
	<i>As a smaller company its more difficult due to T & C of large organisations</i>	An ORR-recognised occupational health psychologist
	<i>Not my field of knowledge.</i>	Other - Driving Standards Manager
	<i>not involved in recruitment</i>	An ORR-recognised occupational health doctor
	<i>The TDL follows the Driver between TOC's so we can check on previous employment & Safety of the Line incidents</i>	An ORR-recognised occupational health doctor

	<i>Drivers being accepted for employment tends to be decided on the transfer of safety critical information document rather than their license</i>	An ORR-recognised occupational health doctor
	<i>It has not affected the recruitment process, it has added considerably to the admin burden following recruitment.</i>	Other - Individual Response
18. Are the training and examination requirements of TDLCR effective?	<i>We believe that the competence requirements for trainers and examiners are not correct. They do not allow for "fast track" graduate schemes as they set minimum time levels for trainers and examiners to have held their licence. We believe it should be up to the industry as to how we determine the competence management standards for trainers and examiners which should be set out in the train operating company's Safety Management System and audited by the ORR.</i>	Railway Industry Body
	<i>We still get Drivers join us who although they have a Licence turn out to have sub-standard basic Driving skills so obviously not.</i>	A FOC
	<i>This is an area where the regulations should be "Goal Setting" and should require Trainers and Examiners to be competent in both the subject matter and method of training or examining. The regulations do set out a clear minimum standard for the trainers and examiners in terms of knowledge required. However, there is a disconnect between the requirements of a good practice competency assessment process and the "time served" element of the licence. For example, to be a trainer or examiner the candidate must have held a licence for a number of years, however, the fact that a licence is held for this period of time does not mean that the candidate has necessarily been driving for that whole period of time. It would be preferred if the regulations emphasised competence in this regard.</i>	Railway Industry Body
	<i>Our training is governed by our own Standards. TDLCR has been incorporated into this procedure. We work against apprenticeship standards – higher level. We are a big TOC doing lots of training so our standards were already high. TDLCR does bring consistency to standards of trainers/assessors</i>	A TOC
	<i>supported by company standard for recruitment and training – {redacted} training syllabus provides consistent approach.</i>	A TOC
	<i>The current approach as continued, therefore there has been no real impact other than additional restrictions on years' experience for examiners. This has prevented some who would be capable from apply for these roles, and others who were already in role but could not meet the criteria being less productive. There should also be a</i>	A TOC

	<i>better way of assessing suitable experience than just duration as it's not a good indicator</i>	
	<i>The experience is restrictive and prevents candidates progressing into DTM role at an earlier stage of their career</i>	A TOC
	<i>Required to register as a training centre for the purposes of TDLCR however no change to the company CMS</i>	A TOC
	<i>Although mostly ok, there are areas where better clarity would assist</i>	A TOC
	<i>TDLCR Part 1 License does not give details of route and traction, medical issues, safety of the line incidents. It also does not affect training standards as they originate from how the TOC decides to operate to the standards (see responses to earlier questions).</i>	Trade Union
	<i>Ensure the relevant competent trainers are delivering training courses. Mandating 3 years train driving experience</i>	A TOC
	<i>However the requirements for training and examination have not significantly changed. There has been additional requirements such as the prior driving experience that has limited some activities for existing assessors/trainers and prevented some suitable applicant from applying and taking up these roles</i>	Other - Professional Head of Operational Safety
	<i>The training requirements of the licence (as opposed to the certificate are not thorough enough or consistent)</i>	Trade Union
	<i>It's hard to deny this hasn't added value but there is perhaps too much of a focus upon experience in terms of a time only as a measurement, as opposed to competency. Is someone with 5 years freight experience moving to a passenger operator immediately a more suitable trainer / examiner than someone with 2 years relevant experience coupled with the necessary professional skills?</i>	A TOC
	<i>But they only reinforce good practice in terms of competence of trainers and assessors anyway. As a provider of driver training to other operators we apply best practice anyway and are assessed on how we train drivers</i>	A TOC
	<i>I am currently booked off as "unfit to drive trains" because of the corrective lens strength limits imposed by the TDLCR. 20 years without a vision related safety of the line incident and I'm now unfit!!!</i>	Other - A Train Driver
	<i>everyone should be training to a similar standard and that can only be good for the industry as a whole</i>	Trade Union
	<i>A lot is left to the operators with no involvement from ORR</i>	An ORR-recognised trainer/examiner

	<i>For assessors who undertake the psychometric tests - there is a lot of training. However I feel the ORR register can be tightened up more. For example, there are Individuals on the register who cannot deliver the driver recruitment process, yet they have an ORR number.</i>	An ORR-recognised occupational health psychologist
	<i>Not my field of knowledge.</i>	An ORR-recognised occupational health doctor
	<i>not involved in training undertake medical examination - there remains areas for improvement</i>	An ORR-recognised occupational health doctor
	<i>TOCs do not apply the schedule 3 exam. Drivers should understand basic motion maths and physics. I have never known an electrician not understand ohms law, or volts amps or resistance. Train drivers should understand newtons second law, time ,speed, distance, suvat etc.</i>	Other - Retired Train Driver
	<i>made no difference</i>	A TOC
	<i>This isn't my area of expertise but anything that standardises training & examination has got to be good as you know a {redacted} Driver has completed the same standard of training as an Avanti Driver, for example</i>	Other - Individual Response
	<i>Training and examination has been adapted to take into account the TDLCR guidance</i>	A FOC
	<i>They are no more or less effective than pre-TDLCR arrangements.</i>	A TOC
19. Has TDLCR had any effects on the market for train drivers?	<i>Applications to be a train driver are usually over-subscribed. However, a sizable element of these applications come from Individuals that wish to embark on a second career.</i>	Railway Industry Body
	<i>The pool of initial candidates to be a train driver is still buoyant, the psychological assessments that were introduced prior to the TDLRC but are now required by it are one of the factors that reduce the pool, however, we do not wish to see this changed. Railway undertakings would like to see the pool extended so that more younger train drivers could be recruited into the industry either directly or through apprenticeships. The TDLCR are a blocker to this as currently written.</i>	Railway Industry Body
	<i>No evidence of change within {redacted}</i>	An ORR-recognised trainer/examiner
	<i>It has widened the market</i>	An ORR-recognised training centre
	<i>Continued to recruit as before</i>	A TOC
	<i>No Knowledge in this area</i>	A TOC
	<i>AWC have not seen any benefit</i>	A TOC

	<i>Made the resource pool of Driver Managers scarce and difficult to recruit for.</i>	A TOC
	<i>No real change, however the regulations have made it harder to explore the potential to recruit drivers at a younger age.</i>	A TOC
	<i>I do not believe this has any affect</i>	A TOC
	<i>I have not seen a downturn of candidates applying to become train drivers.</i>	An ORR-recognised occupational health psychologist
	<i>Everyone wants qualified staff without the need to train them</i>	An ORR-recognised occupational health doctor
	<i>It seems to have increased the pool of Drivers looking for work, especially during the pandemic & the open access operators such as Hull Trains furloughed Drivers</i>	Other - individual Response
	<i>Recruitment and transfer hasn't really changed. I guess if a private Individual were to obtain a Part A then the market may become more competitive.</i>	A FOC
	<i>We have never had a problem recruiting train drivers - both existing drivers from other TOCs and new entrants to the grade. TDLCR hasn't changed this except the admin burden following recruitment.</i>	A TOC
20. What impact, if any, has TLDCR had on the costs of recruiting and training new entrants to be train drivers?	<i>We need to recruit from other operators (so pay more) or need to pay other operators to train them and as other operators are our competitors, they obviously charge a lot.</i>	A FOC
	<i>The administrative burden and support costs has introduced costs into the recruitment process for new entrant train drivers. The administrative burden is caused primarily because it is a paper-based system requiring signatures. Time is taken up by chasing for photographs, paper records and quarterly reports. Additional support costs including printing costs, etc all add up.</i>	Railway Industry Body
	<i>Administrative costs associated with managing the licence arrangements</i>	A TOC
	<i>Admin burden has increased costs and frequency of medicals almost doubled</i>	A TOC
	<i>Increased time/admin costs with additional psychometric testing for unlicensed drivers</i>	A TOC
	<i>Medical examination costs are higher due to the periodicity.</i>	A TOC
	<i>TDLCR has increased the cost for new entrants because applying for licenses can incur delays, not least because they are akin to the complicated</i>	Trade Union

	<i>passport form. However, the availability of Route Traction Cards can mean that the Individual can work whilst they await their license. The additional cost relates to chasing up the missing license and in some cases reapplying for them.</i>	
	<i>Indirect cost to an increase in workloads</i>	A TOC
	<i>These questions (20 to 27 inc) are about costs to the employer. I would read this as an exercise to reduce costs and burdens on operators, probably at the expense of standards.</i>	Trade Union
	<i>This is mostly about the administrative burden. It's still a very cumbersome process that could be far more efficient.</i>	A TOC
	<i>I cannot answer this question as I do not have the facts and figures to base an answer on</i>	Trade Union
	<i>I don't believe there has been an increase in costs just because of TDLCR. Prior to this, candidates were still assessed in the same way - needing to achieve minimum standards across a range of psychometric tests. This was managed through the recognised assessment centres (RACF).</i>	An ORR-recognised occupational health psychologist
	<i>Not my field of knowledge.</i>	An ORR-recognised occupational health doctor
	<i>not involved in recruitment</i>	An ORR-recognised occupational health doctor
	<i>There are more elements of checking which will increase staff time but I'm unable to put a cost on this, sorry</i>	Other - Individual Response
	<i>It has changed what was already in place. The only additional activity is the application for the license.</i>	A FOC
	<i>the requirements of the regs were carried out pre-TDLCR under company SMS arrangements anyway.</i>	A TOC
21. If you believe that TDLCR has had an impact on recruitment and training costs for new entrant drivers then please estimate the average cost per train driver	<i>Don't know specific numbers, this is an estimate</i>	A FOC
	<i>Please refer to Individual Railway Undertaking submissions</i>	Railway Industry Body
	<i>No response as q.20 was N/A</i>	A FOC
	<i>Admin time and additional testing</i>	A TOC

	<i>These questions (20 to 27 inc) are about costs to the employer. I would read this as an exercise to reduce costs and burdens on operators, probably at the expense of standards.</i>	Trade Union
	<i>Time costs plus printing costs.</i>	A TOC
	<i>Admin and additional assessment time</i>	A TOC
	<i>It is a rough guesstimate as there are more checks & TDL's need to be applied for by the Training Centre</i>	Other - Individual Response
22. What impact, if any, has TLDCR had on the costs of recruiting and training existing train drivers?	<i>Any traction training needs to be done externally by an organisation which a train driving raining school and so is inevitably a competitor, this restricts the market for training so prices are high and even then we cannot guarantee quality of training</i>	A FOC
	<i>Transferability of medicals reduces the direct costs to the [redacted].</i>	Other - Heritage Railway Operator
	<i>The administrative burden and support costs has introduced costs into the recruitment process for new entrant train drivers. The administrative burden is caused primarily because it is a paper-based system requiring signatures. Time is taken up by chasing for photographs, paper records and quarterly reports. Additional support costs including printing costs, etc all add up</i>	Railway Industry Body
	<i>New entrant competent driver would already have medical competence in line with TDLCR – if this could be transferred to the new operator then costs could be saved by negating the need for a new entrant medical. Visibility of service history / sickness etc with current employer would support this.</i>	A TOC
	<i>There is an additional burden of admin which has increased costs</i>	A TOC
	<i>No change to process although more information required</i>	A TOC
	<i>This option has been chosen on the basis that staff employed in driver training will still be carrying out that activity whether the recruitment of an existing driver takes place or not.</i>	Trade Union
	<i>These questions (20 to 27 inc) are about costs to the employer. I would read this as an exercise to reduce costs and burdens on operators, probably at the expense of standards.</i>	Trade Union
	<i>This is mostly about the administrative burden. It's still a very cumbersome process that could be far more efficient.</i>	A TOC
	<i>Not my field of knowledge.</i>	An ORR-recognised occupational health doctor

	<i>not involved in recruitment</i>	An ORR-recognised occupational health doctor
	<i>Medicals are more frequent. There are the costs of applying for & administering the TDL's which weren't there before.</i>	Other - Individual Response
	<i>time spent on admin functions related to TDLCR has a resource and consequent financial cost.</i>	A TOC
23. If you believe that TDLCR has had an impact on recruitment and training costs for existing drivers then please estimate the average cost per train driver	<i>Don't know specific numbers, this is an estimate.</i>	A FOC
	<i>These questions (20 to 27 inc) are about costs to the employer. I would read this as an exercise to reduce costs and burdens on operators, probably at the expense of standards.</i>	Trade Union
	<i>Time costs plus printing costs.</i>	A TOC
	<i>Again a rough guesstimate but increased medicals & admin for TDL's</i>	Other - Individual Response
24. Has maintaining compliance with TDLCR... <ul style="list-style-type: none"> • Increased Costs (a lot or a little) • Decreased Costs? (a lot or a little) • Neither increased nor decreased costs • Don't Know? • Not applicable 	<i>Mainly in cost of recruitment and training</i>	A FOC
	<i>In the main TDLCR does not impact significantly on our operation. This year however we lost c.4 days time proving to the ORR that we have an exemption for the operation of trains on the GB mainline.</i>	Other - Heritage Railway Operator
	<i>The administrative burden, support costs and the frequency of medicals has introduced costs into the recruitment process for new entrant train</i>	Railway Industry Body

	<i>drivers. The administrative burden is caused primarily because it is a paper-based system requiring signatures. Time is taken up by chasing for photographs, paper records and quarterly reports. Additional support costs including printing costs, etc all add up. The medical frequencies mean train drivers have to be released, shift patterns changed, and cover organised resulting in an increase in train driver establishment.</i>	
	<i>Increased frequency of medical examinations - annual from 55 Requirements to use approved medical providers - narrows the market and allows them to charge a premium</i>	A TOC
	<i>medical frequency, especially when over 55 is costly</i>	A TOC
	<i>The additional admin activities plus the increased frequency for medical has increased costs. A conservative estimate for {redacted} is- 2,500 to 2,800 hours for the management of TDLCR requirements such as management of comp cert, returns to ORR etc, and approx. 320-350 additional days release for medicals per year. There is no current evidence to indicate if the increased medical frequency provides a benefit from increased health surveillance, and therefore this work and research would need to be undertaken to have a balanced and informed view</i>	A TOC
	<i>Increased due to medical frequency and admin time spent on ETDL</i>	A TOC
	<i>Administrative time cost</i>	A TOC
	<i>Admin costs</i>	A TOC
	<i>Our response is based on the question of it depends upon what you compare the cost with?</i>	Trade Union
	<i>the cost increase to the frequency of medicals</i>	A TOC
	<i>The requirements for the development of standards, processes, training, briefing, management of the TDLCRs including issue and management of complementary certificate, licences and change to previous existing arrangements (such as safety critical ID cards licences) has placed additional costs into operators by taken up management time, potential increase in headcount in order to manage these</i>	Other - Professional Head of Operational Safety
	<i>These questions (20 to 27 inc) are about costs to the employer. I would read this as an exercise to reduce costs and burdens on operators, probably at the expense of standards.</i>	Trade Union
	<i>The increased medical requirements have meant the recruitment of more drivers to facilitate additional release. The administrative burden is very heavy both in terms of collating and providing information to support applications as is the process of collating periodic information on driver</i>	A TOC

	<i>movements, medicals completed, address / name changes etc.</i>	
	<i>We have a large proportion of older drivers so medical costs have risen sharply but this is the same across all age groups. The previous medical frequencies seemed perfectly adequate in managing health and fitness</i>	A TOC
	<i>Since 2013 when the new standards were introduced, the fees for the {redacted} MMI training have increased significantly for {redacted} The which seems a little unfair and I feel that we have been penalised compared to other centres. All other costs, such as TUO-A training has remained the same.</i>	An ORR-recognised occupational health psychologist
	<i>Not my field of knowledge.</i>	An ORR-recognised occupational health doctor
	<i>Cost of staff to manage licensing</i>	A TOC
	<i>the administration and keeping things up to date</i>	A TOC
	<i>Increased medicals. Admin staff to report on medicals, Driver change of address, leavers & starter etc</i>	Other - Individual Response
	<i>There has been extra administration duties associated with the upkeep, although this is not just limited to TDLCR, therefore staff levels have increased to fulfil additional workload, either on a temporary or permanent basis.</i>	A FOC
25. Please estimate the total annual cost to your organisation for complying with TDLCR (and explain your answer)	<i>Driver medical costs £110.00 if they are over 40. Having a compulsory retirement age of 67 would mean 17 medicals undertaken = £1870. Under the old medical process this would = £1320</i>	A TOC
	<i>2500 to 2800 hours and 320-350 driver release days</i>	A TOC
	<i>20K</i>	A TOC
	<i>Admin costs to update the license paperwork. Dependent, but hours of updates can be around 30 hours per year at costs of £500 upwards.</i>	A TOC
	<i>£1k</i>	A TOC
	<i>One additional cost relates to that of the additional age-related medicals with each costing between £1200 and £1500 a time. Assuming an organisation has 50 staff at age 55 and each requires a medical every year to 60, this would lead to an additional £375,000 in that period (£75,000 a year). The cost is obviously duplicated if you take the view of annual age related medicals for staff from ages 55 to 65</i>	Trade Union

	<i>No information available. Significant enquiries will need to take place to get exact amount. Example - currently {redacted} has 182 Drivers 55+ at £300 per medical equating to £54600 per year in medical cost and the additional cost of covering shifts for Drivers to attend medicals</i>	A TOC
	<i>These questions (20 to 27 inc) are about costs to the employer. I would read this as an exercise to reduce costs and burdens on operators, probably at the expense of standards.</i>	Trade Union
	<i>Difficult to quantify but it's estimated that we have had to employ an additional 3 drivers to cover the release demands of around 125 additional medicals per year. Adding in management time and OH costs, an estimate could be around £175k.</i>	A TOC
	<i>Tens of thousands but difficult to give a definitive answer without a lot more time to calculate this</i>	A TOC
	<i>This is dependent on staff turnover, but last year we spent just under £10,000 on MMI training and re-verifications.</i>	An ORR-recognised occupational health psychologist
	<i>I couldn't begin to put an estimate on this as I don't deal with the whole picture</i>	Other - Individual Response
	<i>£150k release costs for driver medicals at increased intervals cost of 'additional' medicals administration - updating register/ processing new applicants and renewal</i>	A TOC
26. Do you consider the total annual cost you supplied in Question 25 is proportionate to the benefits delivered by TDLCR?	<i>TDLCR has few if any benefits over ROGS requirements yet brings costs with it</i>	A FOC
	<i>The benefits of greater assurance processes and the ownership of competence by the driver as the owner of the licence are difficult to quantify as benefits. However, if the administrative burden was reduced and the medical frequencies and other elements were modernised then it would be a resounding yes.</i>	Railway Industry Body
	<i>Good welfare arrangements for staff would mean any issues are identified earlier.</i>	A TOC
	<i>No tangible benefits</i>	A TOC
	<i>Because the sum is minimal</i>	A TOC
	<i>We are able to attract more Drivers but I'm not sure how much that is down to the pay</i>	Other - Individual Response

	<i>It is important to maintain standards and safety</i>	An ORR-recognised occupational health doctor
	<i>TDLCR has not delivered any benefits, therefore this cost is highly disproportionate</i>	A TOC
27. Has TDLCR had any other impacts on costs you have not already told us about?	<i>Slight increase in admin functions, but overall swallowed up by existing roles.</i>	A TOC
	<i>Management time to update spread sheets, keep records.</i>	A TOC
	<i>driver release for additional medical frequency.</i>	Other - Professional Head of Operational Safety
	<i>These questions (20 to 27 inc) are about costs to the employer. I would read this as an exercise to reduce costs and burdens on operators, probably at the expense of standards.</i>	Trade Union
	<i>I am currently booked off as "unfit to drive trains" because of the corrective lens strength limits imposed by the TDLCR. 20 years without a vision related safety of the line incident and I'm now unfit!!! I'm probably not the only one.</i>	A FOC
	<i>Continued use of {redacted} used to record and maintain licence records - has a cost for use and continuous updating to meet needs</i>	A TOC
28. What effects have the medical or psychological fitness requirements of TDLCR had on your organisation?	<i>Limited effect of TDLCR on driver fitness or identifying issues – most elements or processes have remained the same. There has been some impact, as reported by operators, that additional effort to address the bureaucratic and administrative requirements is now required, creating the need for additional resource and cost to maintain licenses for drivers. This is particularly applicable to the additional medical examination frequency requirements.</i>	Railway Industry Body
	<i>The medical requirements are too detailed and the frequency of medicals too great. the regulations should call for train drivers to be competent and the industry should determine how those competency requirements are met.</i>	Railway Industry Body
	<i>Few, as the medical is basically the same as that previously used</i>	A FOC
	<i>The frequencies of medicals have driven costs into railway undertakings. The frequencies of medicals need to be modernised in line with the changes to the state pension and railway pension schemes as these demonstrate that the population is living healthier and longer lives.</i>	Railway Industry Body

	<i>The TDLCR brought in no significant changes to the current practice undertaken by railway undertakings.</i>	Railway Industry Body
	<i>Administrative burden, Drivers stood down as medical providers cannot cope with demand, having to use approved suppliers drives cost increase, payroll costs due to increase in headcount</i>	A TOC
	<i>Greater opportunity to identify issues based on increased medical frequency</i>	A TOC
	<i>Consistent standard of health fitness</i>	An ORR-recognised occupational health doctor
	<i>Psychometric assessors are referred to as psychologists which should be reflected in the ORR register</i>	A TOC
	<i>The frequencies of medicals have driven costs into railway undertakings</i>	A TOC
	<i>Reassessment required for unlicensed applicants after 5 year</i>	A TOC
	<i>The simple answer from an employer's point of view is to have increased costs but with increased benefits in employee management and health awareness.</i>	Trade Union
	<i>No material benefit can be seen from the additional medical frequencies.</i>	A TOC
	<i>Probably where there has been some benefit but the industry is improving how it manages mental health anyway and I'm not sure this is all down to TDL</i>	A TOC
	<i>I am currently booked off as "unfit to drive trains" because of the corrective lens strength limits imposed by the TDLCR. 20 years without a vision related safety of the line incident and I'm now unfit!!</i>	Other - A Train Driver
	<i>It has helped keep drivers fit and saved them serious illness on a number of occasions in my experience</i>	Trade Union
	<i>Unknown but with recent recruits to the industry I would question if this scheme if proving worth</i>	Trade Union
	<i>Not sure its followed following initial recruitment. Too many inexperienced Rail doctors signing off fitness under the guise of one registered doctor within the organisation.</i>	An ORR-recognised trainer/examine
	<i>The TOC I work for uses non registered psychological registered practitioners</i>	An ORR-recognised trainer/examine
	<i>Appropriate physical examination standards but can always improve</i>	An ORR-recognised occupational health doctor
	<i>Should consider improvements for standardised assessment</i>	An ORR-recognised

		occupational health doctor
	<i>Increased frequency coupled with increased standards has meant more drivers being removed temporarily or permanently. Also cost of repeat medical exams.</i>	A FOC
	<i>Inconsistencies with requirements in 3451</i>	An ORR-recognised occupational health doctor
	<i>Having some standards is better than nothing</i>	An ORR-recognised occupational health doctor
	<i>None - the standards were applied before TDLCR through company SMS</i>	A TOC
29 Have the medical or psychological fitness requirements of TDLCR enabled the prompt identification of driver medical or psychological issues? (if so, can you explain how this has improved safety?)	<i>Not seen to have any noticeable impact as most overall processes are similar to before, if more codified.</i>	Railway Industry Body
	<i>What TDLCR brought in was almost the same as what was already in existence via ROGS and Railway Group Standards/Railway Industry Standards so improvement in this area must be attributed to ROGS and RSSB-published standards not to TDLCR.</i>	A FOC
	<i>Regular monitoring has identified conditions that were otherwise unknown.</i>	Other - Heritage Railway Operator
	<i>Railway undertakings do not believe the increased frequencies of medicals have introduced any change in the identification of medical conditions affecting safety.</i>	Railway Industry Body
	<i>Medical assessment does pick up medical issues but only at the time of the medical. For the system to be robust you rely on managers and drivers raising health concerns/issues between medicals. This doesn't always happen. In addition whilst medical assessment after an incident is reasonable this is 'post event'.</i>	An ORR-recognised occupational health doctor
	<i>Seems to be working – more F2/U2 reports – more physical rather than psychological reports.</i>	A TOC

	<i>Medical status and advice when recruiting drivers has been poor. No psychological assessment after recruitment so wont pick up any changes post recruitment. Renewals require the TOC to identify issues to raise for the medical practitioner to investigate</i>	
	<i>In a couple of cases medical issues have been identified, these can be simple issues such as eye-sight, hearing or raised blood pressure. improved safety would result in drivers being treated sooner which would reduce the risk of a medical issue in the workplace leading to an incident.</i>	A TOC
	<i>All new recruits have a psychological fitness assessment before being seen by the ORR doctor. Therefore, unsuitable candidates are already removed from the process before assessed by the doctor. Unsuitable medical candidates are rare and also removed as soon as practicable.</i>	An ORR-recognised occupational health doctor
	<i>Existing medical standards prior to 2010 were also suitable so changes are not possible to compare</i>	A TOC
	<i>It has not identified any illness or conditions sooner due to standard of medical completed</i>	A TOC
	<i>Has not been experienced, however issues identified at periodic medicals would enable the removal of drivers from duty quickly.</i>	A FOC
	<i>No discernible difference in identifying issues</i>	A TOC
	<i>Process was already fully covered prior to TDLCR</i>	A TOC
	<i>Recognised psychometric assessor (ORRPP) need to hold qualifications in line with the BPS are not psychologists, and this may put off new assessment centres trying to gain entry into the industry as the requirements are misleading</i>	An ORR-recognised occupational health psychologist
	<i>{redacted} are not aware of any issues</i>	A TOC
	<i>Identifying problems early and not having drivers affected by a condition that they may not be aware of that would affect their ability to carry out their duties in a safe manner would be beneficial. Service delivery aside.</i>	Trade Union
	<i>it has a previously answered helped a number of drivers with an unknown medical condition and the medication checks we do as part of this process have made drivers aware of serious side-affect and be able to go back to their GP and obtain new medication</i>	Trade Union
	<i>As above . {redacted} use outsourced services that are not registered</i>	An ORR-recognised trainer/examiner
	<i>The standards do enable identification of valid exclusion on safety grounds although "prompt" is not a feature</i>	An ORR-recognised occupational health doctor

	<i>psychological issues not picked up all the time some physical fitness requirements enable advice for early intervention so that driver not allowed to continue safety critical duties until standards met through ACMS Database and reports</i>	An ORR-recognised occupational health doctor A TOC
	<i>I'm aware of one Driver who had an ECG at a medical which the Doctor was not 100% happy with. A consultant at {redacted} looked at the ECG print out & requested to see the Driver; a heart issue was then diagnosed & resolved saving a potential heart attack or stroke whilst in/out of work</i>	Other - Individual Response
	<i>I don't think there has been a change as there were rail standards prior to TDLCR</i>	An ORR-recognised occupational health doctor
	<i>In general results are provided swiftly however some providers are less swift and a restriction is only discovered after the exam and sometimes with the driver driving.</i>	A FOC
	<i>previous 3451 also enabled this</i>	An ORR-recognised occupational health doctor
	<i>yes</i>	An ORR-recognised occupational health doctor
	<i>I don't believe it's any different from what we were already doing as an organisation</i>	Other - Driving Standards Supervisor
	<i>None - the standards were applied before TDLCR through company SMS and as such would have been picked up on normal periodical medicals.</i>	A TOC
30. Do you think the current regime of recognised doctors and recognised psychologists is satisfactory?	<i>With the caveat that improvements could be made.</i>	HM Railway Inspector
	<i>Seem to work.... but again this was/is based on existing ROGS regime as we use one medical practitioner for all medicals whether for Drivers, Ground staff or others. So TDLCR is just another "flavour" of medical they offer. Cannot comment on regime of psychologists.</i>	A FOC
	<i>However, there are some supplier issues for smaller operators. Some of the medical providers do not wish to deal with smaller operators.</i>	Other - Heritage Railway Operator
	<i>I don't think that this is monitored sufficiently. It is important to have doctors who understand the</i>	An ORR-recognised

	<i>railways and the particular TOCS they provide a service to. Currently the ORR relies on self-reported experience and, for example, a doctor could remain on the register without completing a medical for many years. Doctors and psychologists should be required to submit an audit of their work, much like HSE requirements for their appointed doctors</i>	occupational health doctor
	<i>How do we challenge this - fine as long as they are meeting the standard. Increases costs to the end user as have to use the recognised doctor and seems like achieving this is difficult</i>	A TOC
	<i>The number of available appointments is not sufficient. Very often a review is required but cannot be achieved within the prescribed timescale.</i>	A TOC
	<i>The new RSSB rail course should be made mandatory to become an ORR recognised doctor in addition to appropriate rail experience. There is no confirmation of rail experience or knowledge when applying to become an ORR doctor. Few ORR doctors actually perform rail work. There should also be some form of annual audit of their supervisory role.</i>	An ORR-recognised occupational health doctor
	<i>See prior answer concerning the ORR register</i>	A TOC
	<i>Constraints by recognition. Not enough suppliers as doctors are working for medical centres.</i>	A TOC
	<i>Barrier for new providers coming into the industry, reduces competition and increases costs</i>	A TOC
	<i>Had no issues with system</i>	A TOC
	<i>Medical centres very poor, results that have come back totally incorrect. Drivers off for no reason</i>	A TOC
	<i>However a standard medical form would be really useful as recognised doctors still fail to provide full information on their companies form.</i>	A TOC
	<i>See answer to Q29</i>	A Railway industry Body
	<i>The standards that the various OH companies apply are not consistent.</i>	A trade union
	<i>I understand what you are trying to do and it makes sense to standardise and register, however the resource pool is small and makes it difficult to attract registered doctors. We need more support or mitigation to allow us to operate more efficiently. I am concerned that the pool seems to be getting smaller and the impact on railway operations could be greater in future.</i>	A TOC
	<i>handling long term sickness can sometime be very trying</i>	A trade union
	<i>As mentioned previously, we are not psychologists and therefore we would like to be recognised accordingly. It is very misleading to everyone to refer to us as this. In addition, there are Individuals on the ORR register that are not</i>	An ORR-recognised occupational health psychologist

	<i>able to undertake the psychometric tests and therefore really shouldn't be on there. I'm always having to chase ORR to update the register as it is often out of date as well.</i>	
	<i>There are not enough doctors available</i>	Other - Driving Standards Manager
	<i>It has given a select few a monopoly, surely if the framework is set then any medical practitioner is sufficient to follow that</i>	Other - A train driver
	<i>Although important I think it is essential for there to be a more rigid structure for identifying those medical practitioners who are eligible and competent to be on the ORR register. At present this is rather ill-defined and not well administered.</i>	An ORR-recognised occupational health doctor
	<i>not involved in recognised psychologist input as this assessment is not made available when undertaking medical assessment as recognised doctor</i>	An ORR-recognised occupational health doctor
	<i>We know the Doctors & psychologists we can use; it is on the ORR website</i>	Other - Individual response
	<i>I think it is too easy to gain recognition in the first instance and no subsequent checks that people remain suitable</i>	An ORR-recognised occupational health doctor
	<i>ORR doctors should not have to go through regular checks - Once you have experience of rail medicals (even if you work in another sector) you are still competent once you come back to it.</i>	An ORR-recognised occupational health doctor
	<i>Historically we only used Drs registered with the GMC, so I am not sure what value this register adds.</i>	A TOC
31. Are the medical requirements under Schedule 1 of TDLCR satisfactory?	<i>RSSB have initiated a review of the medical fitness standards (RIS-3451-TOM Train Drivers – Suitability and Medical Fitness Requirements, issue 1; RIS-3452-TOM Train Movement – Medical Fitness Requirements, issue 1; and GOGN3655 Guidance on Medical Fitness for Railway Safety Critical Workers, issue two) to ensure these align and do not contradict the contents of TDLCR. Some requirements in TDLCR are now more restrictive than previously, and therefore any content of the RSSB standards is expected to change to align with TDLCR and provide guidance on these. From an RSSB perspective, it would be useful to understand if there are any likely planned changes to the medical fitness legislation and requirements within TDLCR so that this can be taken into account for the RSSB standards review. Industry queries raised around colour vision requirements for drivers, and whether ‘sufficient colour vision’ is enough for drivers to be safe to drive currently</i>	A railway industry body

	<p><i>contradicts the legislative requirement that drivers must have 'normal' colour vision – therefore further guidance from the ORR on what normal means in this case would be helpful, or an understanding of whether this element of the legislation is likely to change in the future would be of use to the RSSB review and potential future research or work looking into alternative tests. The directive and regulations refer to alternative colour vision tests, but provide no guidance on what alternative tests could be acceptable or approved. This needs to be clarified. In addition, if there are any additional vision requirements, prescription limits or guidance on varifocals, that will need to be altered or additionally specified in TDLCR, as a result of the introduction of ETCS and readability of DMIs by drivers.</i></p>	
	<p><i>As commented earlier, the requirements are too restrictive and the frequency of medicals too great. The medical requirements around the following need further research: a) Visual Acuity b) Length of time off work and the need for further medicals c) Availability of alternative testing for colour blindness The frequency of medicals should recognise that the general population is living longer and healthier lives. There seems to be no justification for the increased medicals that the TDLCR introduced. We have seen no benefits from the increased frequency of medicals only extra cost through the release of train drivers.</i></p>	<p>A railway industry body</p>
	<p><i>With the caveat that interpretation of Schedule 1 could probably be improved.</i></p>	<p>HM Railway Inspector</p>
	<p><i>However they don't need to be driver by TDLCR as they are basically same as they were previously. (The expertise they sit on is from the ROGS regime and RSSB research not the TDLCR per se so this is NOT an endorsement of TDLCR).</i></p>	<p>A FOC</p>
	<p><i>Railway Undertakings believe that the introduction of TDLCR has meant that medical frequencies are too high and that the bar is too high for visual acuity and that an alternative colour blindness test should be included within the regulations.</i></p>	<p>A railway industry body</p>
	<p><i>See earlier answer. Vision standards (particularly distance) open to misinterpretation. The statements on contrast and ability to withstand dazzle are purely a yes/no answer from the driver, no objective test. Hearing standards confusing, the following 'should be taken as guidance', an oxymoron. What does 'general medical examination' actually mean, ORR guidance states full, cardiovascular, respiratory, neurological and musculoskeletal examination. Only a doctor has the competency to do this but many OH providers only use a Nurse for face to face assessment. In</i></p>	<p>An ORR-recognised occupational health doctor</p>

	<i>addition, what is the evidence base for a full medical examination in a driver who is asymptomatic? What is the evidence base for ECGs? Whilst occasional cardiovascular issues are identified, the vast majority of abnormal ECGs cause unnecessary anxiety and further tests for the driver. Cost and operational implications for TOCs. Medical standards much like UK DVLA or Australia/New Zealand/Canada rail standards would be much better. They would increase the likelihood of standardised and fair assessments.</i>	
	<i>Psychological requirements can be a grey area and open to interpretation</i>	A TOC
	<i>There is need for clarity on colour vision requirement especially if failed Ishihara. Is there need for agreed secondary tests</i>	An ORR-recognised occupational health doctor
	<i>there were some issues at point of transition several years ago, now in place they are consistently applied across operators. When staff transfer from Operator to Operator this information should transfer with the Individual as they were managed under the same standard. Permissions within GDPR would allow this with Individuals consent.</i>	A TOC
	<ol style="list-style-type: none"> 1. Visual acuity requirement should be converted to Snellen equivalent. 2. Remove the maximum corrective lens requirements as not implemented (doctor decision) 3. Change near vision to N8 standard and remove intermediate vision as not objective. 4. Remove Recognition of colour signals as not implemented and already covered. 5. Remove Sensitive to contrastsnot objective or measurable and not being undertaken by service provers anyway. 6. Remove Ability to withstand dazzle ...not objective or measurable and not being undertaken by service providers anyway. 7. Remove Binocular visionnot an ability to drive trains. Not being undertaken by service providers anyway. 8. Remove Resting ECG requirement.....false negative results causes more problems. Likelihood of an unknown asymptomatic resting ECG being positive is extremely rare. Change to "ECG as clinically indicated". 	An ORR-recognised occupational health doctor
	<i>The increased frequency imports a cost with currently no indication of the benefit this may bring</i>	A TOC
	<i>TDLCR has meant that medical frequencies are too high and that the bar is too high for visual acuity and that an alternative colour blindness test should be included within the regulations.</i>	A TOC

	<i>Yes, further requirements would seem to be excessive</i>	A TOC
	<i>See Q30</i>	A TOC
	<i>Members at the meetings of Driver Managers advised that with one exception, their train operators do not apply psychological fitness requirements for TDLCR and are not aware of any additional requirements.</i>	a trade union
	<i>The frequency of medicals is overly restrictive and has placed an additional cost burden on operators. The previous medical frequency was sufficient for the UK, so reversion back to this should be considered</i>	Other - Professional Head of Operational Safety
	<i>The general requirements are satisfactory but some of the specifics need addressing. Particularly vision and vision testing</i>	a trade union
	<i>Medical frequencies as stated, plus the visual acuity requirements appear to stringent for most UK operators.</i>	A TOC
	<i>But not radically different to what we had previously</i>	A TOC
	<i>I am currently booked off as "unfit to drive trains" because of the corrective lens strength limits imposed by the TDLCR. 20 years without a vision related safety of the line incident and I'm now unfit!!!</i>	Other - A train driver
	<i>I believe that this currently works well</i>	A trade union
	<i>If mandated and audited appropriately</i>	An ORR-recognised trainer/examiner
	<i>As above, I think somebody needs to take responsibility for clarifying what level of risk of sudden incapacity we are accept societally for train drivers. I also think we need greater detail in linked RIS/ guidance.</i>	An ORR-recognised occupational health doctor
	<i>Some of the standards are not evidence-based and need reviewing such as the visual standards for strength of visual correction lenses which is illogical.</i>	An ORR-recognised occupational health doctor
	<i>improvements always useful</i>	An ORR-recognised occupational health doctor
	<i>Could do with being updated in some areas - esp. with regard to clarification on sight and glasses</i>	A TOC
	<i>I'm not a medical physician but I believe the medicals are thorough</i>	Other - Individual response
	<i>see previous answers. In addition: resting ECGs in asymptomatic Individuals is a waste of time and money with no impact on risk. more info about what a "general examination" should include as a minimum - there are vast differences I see between doctors in understanding this. Not at</i>	An ORR-recognised occupational health doctor

	<i>"increased risk of sudden incapacity" - again - no consistency with such a vague statement Frequency of reassessments: less when younger - match frequency to risk</i>	
	<i>I agree with the frequency for over 60's but the frequency prior to that seems somewhat onerous.</i>	A FOC
	<i>They need to be clarified for a UK audience</i>	An ORR-recognised occupational health doctor
	<i>They could be improved by updating them, making them more detailed and evidence based.</i>	An ORR-recognised occupational health doctor
	<i>The medical standard part of this legislation is very poorly worded. The words 'must' and 'should' seem to be used interchangeably which leaves some of the requirements open to interpretation - an example is the hearing requirements, also the term guidance is used inappropriately.</i>	A TOC
32. Are the driver training and examination provisions in TDLCR satisfactory?	<i>As mentioned previously, the regulations are too detailed which does not allow for innovation within the train operating companies. They restrict "fast track" graduate schemes and, furthermore, holding a licence for a number of years does not necessarily mean that they have the experience necessary to be a trainer or examiner. We believe that all the requirements for trainers and examiners should be part of a company's Competence Management System which forms part of the Safety Management System which is then audited by the ORR. We further believe that this is an area for industry standards rather than regulations which then could allow the flexibility required for train operators with their varying business models.</i>	a railway industry body
	<i>They restrict who can train Drivers yet this does not appear to have improved quality, the FOC sector is still focused on "rules and role" and we have had Drivers join us or come for interview who were apparently competent but incidents and/or circumstances suggested that we cannot assume their training was to standard.</i>	A FOC
	<i>This is another area which would benefit from the regulations being lifted to a "Goal Setting" level. Overall, the requirements are overly prescriptive and drive longer than need be driver training courses. The train driver training course requirements need to be modernised to reflect the way railway undertakings manage faults and failures for example. For example, it is common practice in many railway undertakings for drivers to contact the maintenance facility when a fault has been diagnosed by the system rather than</i>	A railway industry body

	<i>having to have the skills to sort out the problems themselves. As trains are becoming more sophisticated, this use of systems and highly skilled technicians will only increase.</i>	
	<i>Northern work above. Other TOCs the standard feels a bit low TDLCR – meet the minimum standard but TNA needs to capture areas for upskilling Give level of comfort around rule book theory, route and traction TOC still needs to do that assurance piece</i>	A TOC
	<i>Robust and embedded into company standard</i>	A TOC
	<i>Most areas have reminded unchanged apart from the additional admin that is now required</i>	A TOC
	<i>Need far more clarity in the detail</i>	A TOC
	<i>[redacted] members are not aware of any such provisions.</i>	A trade union
	<i>in conjunction with internal standards and processes</i>	A TOC
	<i>The current arrangements place restrictions on both driving experience and medical requirements for trainers and examiners. This has prevented suitable people from applying, where driving experience is suitable but short of the requirements, as extended this to meet the years experience provides no demonstrable benefit, as continued support for driving experience can be provided- e.g. continued retention of driving experience, increase experience on simulators for emergency, out of course and degraded operations etc Those with suitable skills and experience however have found themselves unable to meet the medical requirements can continue to teach and share learning, however can be prevented from becoming a recognised trainer. Therefore these restrictions should be reviewed</i>	Other - Professional Head of Operational Safety
	<i>They are too prescriptive. Operators should have the ability to determine their own minimum competence requirements dependent on their own operation. Some core competency needs will be consistent across the board but there are many differences from one operation to another.</i>	A TOC
	<i>Again, apart from some additional assessment requirements and clarity of assessor/trainer competence, it's not THAT different to what we did anyway</i>	A TOC
	<i>I believe these are working well</i>	A trade union
	<i>Poor training structure used currently . Standard not followed rigidly</i>	An ORR-recognised trainer/examiner
	<i>Not my area of expertise.</i>	An ORR-recognised occupational health doctor

	<i>involved in examination only</i>	An ORR-recognised occupational health doctor
	<i>The same reasons as any other job. As a pilot I had to pass exams and understand the theory of flight. Therefore so should train drivers understand basic physics of motion.</i>	Other - Retired Train Driver
	<i>I'm sorry but I don't know enough about the provisions to be able to comment</i>	Other - Individual response
	<i>The TDLCR requirements existed pre-TDLCR within the companies SMS and therefore add no value (or are extremely difficult to quantify what value they bring)</i>	A TOC
33. Are the training content and methods that recognised trainers are required to apply under TDLCR satisfactory?	<i>The training content does not take into account the advances made in Non-Technical Skills and does not encourage the take-up of RM3. The training methods require review to make sure that they have kept up with modern training methods. Again we believe industry guidance in this area rather than regulation is more appropriate which could then be made flexible enough to support the varying business models of train operators.</i>	A railway industry body
	<i>Not a Driver training schools.</i>	A FOC
	<i>The methods of training are satisfactory; however, the training content is overly prescriptive and not in line with the way railway undertakings manage their operation.</i>	a railway industry body
	<i>As above. Aligned to apprenticeship standards</i>	A TOC
	<i>The years experience for examiners and trainers prevents some that would be capable from performing this role from doing so. Duration of driving is not a god indication of capability. Medical restrictions or not meeting the medical requirements that may prevent someone from continuing driving can inhibit them from performing training and examination roles when they would be capable from doing so with reasonable adjustments</i>	A TOC
	<i>Training content did not fundamentally change when ETDL was brought</i>	A TOC
	<i>Need far more guidance in the detail</i>	A TOC
	<i>{redacted} member advise that there isn't any training content and methods under TDLCR but that train operators carry out that function.</i>	A trade union
	<i>All covered in internal training and standards</i>	A TOC
	<i>wider scope should be available to encourage greater use of self-paced and adult learning techniques, and the requirements should be less prescriptive on method and content. The emphasis should be on the duty holder satisfying the requirements of the GB mainline rules, standards, concept of operations etc</i>	Other - Professional Head of Operational Safety

	<i>There is no consistency across the industry with widely varying standards. This is creating an uneven playing field. Some operators are using this inconsistency to lower standards.</i>	A trade union
	<i>Training methods are fine, but the content of training is overly prescriptive.</i>	A TOC
	<i>but you can always do better,</i>	A trade union
	<i>Need further involvement with those who train</i>	An ORR-recognised trainer/examiner
	<i>Not my area of expertise.</i>	An ORR-recognised occupational health doctor
	<i>I had to explain to a competence manager the units of deceleration. He could not get it, as for the kinematic equations it was impossible. You need to up the standard of tuition.</i>	Other - Retired Train Driver
	<i>Yes, from what I've been told.</i>	Other - Individual response
	<i>The TDLCR requirements existed pre-TDLCR within the companies SMS and therefore add no value (or are extremely difficult to quantify what value they bring)</i>	A TOC
34. Are the TDLCR general professional knowledge and requirements for train driving licences effective?	<i>The general professional knowledge does not reflect the advances made in human factors knowledge such as in Non-Technical Skills. The requirements around the knowledge of the Safety Management System seem to be a nod towards "tick box" safety rather than the train driver understanding the safety context that they are operating within.</i>	a railway industry body
	<i>Difficult to say as we've seen weak Drivers but as we didn't train them we cannot say whether it was the TLDCR requirements or the poor application of those requirements that was the cause.</i>	A FOC
	<i>This section is overly theoretical and requiring the train driver to understand the company's safety management system, for example. It would be better if the emphasis was on the role the driver plays in making sure that the operation of the train is safe and the environment and context that the driver is in to assure their safety. It needs to be more practical and focussed on the train driver. The rules and regulations then would then sit neatly into this by being able to explain the need for compliance and showing how the train drivers' professionalism is demonstrated by being respectful to the rules and regulations. The industry has embedded in its processes "Non-technical Skills", however, these are largely</i>	a railway industry body

	<i>ignored by the TDLCR and should be considered in this section.</i>	
	<i>As above. Aligned to apprenticeship standards</i>	A TOC
	<i>New drivers should learn about all UK rail operations, the approach that some operators take in only teaching absolute minimum for their operation significantly stunts the wider knowledge of the Individual and creates a huge training need should Individuals move on to another operator. Should that operator not robustly explore any knowledge gaps a significant risk to safety could be present and go unnoticed.</i>	A TOC
	<i>The existing arrangements have continued therefore the impact is not possible to be determined</i>	A TOC
	<i>Training content did not fundamentally change when ETDL was brought. Driver Training was developed using RBTNA before ETDL was introduced</i>	A TOC
	<i>As per ROGS and company SMS</i>	A TOC
	<i>See Q32/33</i>	A TOC
	<i>We are advised that they have no bearing on training other than O3 under the Driver Apprenticeship Scheme (and not all operators use that).</i>	a trade union
	<i>Enhanced through company standards</i>	A TOC
	<i>wider scope should be available to encourage greater use of self paced and adult learning techniques, and the requirements should be less prescriptive on method and content. The emphasis should be on the duty holder satisfying the requirements of the GB mainline rules, standards, concept of operations etc</i>	Other - Professional Head of Operational Safety
	<i>There is no consistency across the industry with widely varying standards. This is creating an uneven playing field. Some operators are using this inconsistency to lower standards.</i>	a trade union
	<i>Concerned about the arbitrary figure of XX amount of years to train and particularly assess. It should be based on someone's competence and capability - not a set figure.</i>	A TOC
	<i>Again these are overly prescriptive in some areas and very theory / technical based. It would be useful if an element of non-technical skill requirements were included as these are often the cause of safety incidents, rather than technical failure.</i>	A TOC
	<i>Not my area of expertise.</i>	An ORR-recognised occupational health doctor
	<i>Certainly not for theoretical understanding of maths and physics.</i>	Other - Retired Train Driver

	<i>Providing the knowledge is kept up to date which is a requirement under the Regulations</i>	Other - Individual response
	<i>The TDLCR requirements existed pre-TDLCR within the companies SMS and therefore add no value (or are extremely difficult to quantify what value they bring)</i>	A TOC
35. Are the TDLCR professional knowledge of infrastructure and rolling stock requirements for train driving certificates effective?	<i>Again, these would be best held within industry standards so that they can keep up with modern technology. Why, for example, does a train driver require to know about the suspension systems of the modern multiple unit? Aspects of ATO and ETCS could reduce the level of route knowledge required, however, this is not recognised by the regulations, for example, on diversionary routes.</i>	a railway industry body
	<i>They restrict the ability of an organisation to get training for rolling stock from the most knowledgeable source.</i>	A FOC
	<i>The requirements, especially in rolling stock, are outdated. Why do train drivers need to know the detail about suspension, etc. The regulations do not recognise that the Railway Undertakings employ a “phone a friend” approach to many of its faults and failure situations involving the driver contacting a train maintenance engineer or technician rather than trying to work it out for themselves. As far as infrastructure knowledge is concerned, it is unfortunate that a certified holder is required in the cab for all types of diversionary routes. If the diversionary route was short and a speed restriction applied, it should be possible for an uncertified train driver to drive the train over the diversionary route.</i>	a railway industry body
	<i>As above Aligned to apprenticeship standards</i>	A TOC
	<i>The existing arrangements have continued therefore the impact is not possible to be determined</i>	A TOC
	<i>There has been no or minimal change to the way routes and traction are assessed.</i>	A TOC
	<i>Backed up by our own internal processes.</i>	A FOC
	<i>As per ROGS and company SMS</i>	A TOC
	<i>See Q32/33</i>	A TOC
	<i>The Driver Managers attending {redacted} organised meetings advised that this element refers to the Part 2 Paper License which is effective if applied to the appropriate route and traction. However, we have reported earlier issues with the Paper License not transferring between employers and that, even where it does, it does not prevent the receiving company from requiring</i>	a trade union

	<i>the driver to carry out traction and route training again (see response to Question 6).</i>	
	<i>Enhanced through company standards</i>	A TOC
	<i>wider scope should be available to encourage greater use of self paced and adult learning techniques, use of simulation and virtual environments, and the requirements should be less prescriptive on method and content. The emphasis should be on the duty holder satisfying the requirements of the GB mainline rules, standards, concept of operations etc and more flexible on timescales for physical retention</i>	Other - Professional Head of Operational Safety
	<i>There is no consistency across the industry with widely varying standards. This is creating an uneven playing field. Some operators are using this inconsistency to lower standards.</i>	a trade union
	<i>These are overly prescriptive and not reflective of current practice. Drivers are no longer required to have an in depth knowledge of traction but instead need to know the process to follow in terms of a failure (i.e. contact Control).</i>	A TOC
	<i>Not my area of expertise.</i>	An ORR-recognised occupational health doctor
	<i>Schedule 5 calculate brake performance and the Loughborough incident I rest my case. {redacted} fail to highlight this failing.</i>	Other - Retired Train Driver
	<i>Providing the certificates are kept up to date & the Driver has the certificate in their possession when driving trains - spot checks are undertaken & there is a process in place if a Driver misplaces their certificate. Drivers have their traction & routes shown in one handy document</i>	Other - Individual response
	<i>This is an extension of route/ traction cards and general certificate of competence that we issued pre-TDLCR as part of our SMS. In the event that TDLCR was withdrawn we would retain this element.</i>	A TOC
36. Do you think ORR's arrangements (i.e. guidance and other support) for the suspension and withdrawal of licences are effective ?	<i>Following recent work, historically this has been inconsistent.</i>	HM Railway Inspector
	<i>Often don't get any reply at all from the licensing team if asking about validity of a Driving licence, know of at least one Driver who didn't drive for any operator for over 18 months but heard nothing</i>	A FOC

	<i>from ORR's licensing team, the regime in the Guidance didn't appeared to be applied.</i>	
	<i>This process is labour intensive. I cannot understand why a company cannot suspend the licence where required. A manager has to email the HR centre, who then correspond with the ORR. It is very labour intensive – admin burden, not smooth process, long winded. Too easy for things to get missed Why we can't have a database to log issues and then track progress without a manual check needing to be done via email with the ORR. It does have the benefit as we now have a method to remove the licence to stop dangerous Individuals moving to other TOCs</i>	A TOC
	<i>In some cases there is reluctance to suspend licenses. Routine inspections carried out by inspectors is also sporadic and could be improved. More stringent inspection of drivers incident history and clear guidance as to when the number of incidents and the type of incident becomes intolerable is not evident within the guidance.</i>	A TOC
	<i>Often there can be confusion between the comp cert and licence, where the withdrawal of 1 does not always withdraw the other. Existing arrangements for the removal of competence have also continued</i>	A TOC
	<i>Email system of notification and read only {redacted} not user friendly</i>	A TOC
	<i>Have not had to invoke a suspension or withdrawal, however they seem workable</i>	A TOC
	<i>Members in our meetings cited issues of the potential time taken to return licences (with ORR working to a 30 day turn around) and a seemingly different arrangements regarding withdrawn driver licences and the situation for a driver who may not have been driving for three months. Members also questioned how well managed the system was because they had heard about an audit in one TOC which found issues with ten licenses.</i>	a trade union
	<i>Generic guidance is adequate however more specific guidance is required for certain circumstances for example when a driver on secondment and competence has lapsed</i>	A TOC
	<i>We have no direct experience of the ORR's methods, guidance and support in regard to these questions.</i>	a trade union
	<i>The notification form (Excel document) is difficult to complete and doesn't always allow us to provide sufficient information. It would be useful to have an acknowledgement or update once the ORR have been notified of an issue with a driver's licence. At the moment, we advise the ORR of the</i>	A TOC

	<i>removal of a certificate and / or dismissal but we don't always get feedback on action taken.</i>	
	<i>They are but there does seem to be some abrasiveness in how this is managed, especially in terms of managing the licence process for drivers</i>	A TOC
	<i>I find this area somewhat problematic, perhaps that might be due to the few amounts of time that I have to inform of any changes to the Individual</i>	a trade union
	<i>Orr need more involvement with those who issue certificates.</i>	An ORR-recognised trainer/examiner
	<i>Not my area of expertise.</i>	An ORR-recognised occupational health doctor
	<i>Very vague and specific guidance takes time to receive when requested. Clearer guidelines required, as well as better reporting on current status of drivers.</i>	A TOC
	<i>Far too slipshod. The mentality of some drivers is appalling.</i>	Other - Retired Train Driver
	<i>I believe they are under preview and will be produced soon, so cannot comment on new regulations but the current cant be a little vague or not detailed enough and the current ORR {redacted} system is not fit for purpose</i>	A TOC
	<i>I've not been involved in this but the section in the Regulations does seem quite 'wordy' & perhaps not 100% clear</i>	Other - Individual response
	<i>I have put NO but this is more the fault of RU's not understanding the process rather than the system</i>	A FOC
37. Do you think ORR's arrangements (i.e guidance and other support) for the recognition of training and examination centres are effective ?	<i>We believe that the TDLCR have increased the standard of facilities for the training of train drivers.</i>	a railway industry body
	<i>Not yet been through that process.</i>	A FOC
	<i>Needs to be clearer and definitive answer needed on questions rather than passing the issue back to the TOCs</i>	A TOC
	<i>submission of training centre arrangements and capabilities is submitted and approved by the ORR periodically. A structured list of approved centres is then held and publicly declared by the ORR.</i>	A TOC

	<i>Yes although it lacks the guidance that these applications should be performed during the re-submission for safety certificates</i>	A TOC
	<i>Driver Managers from different operators were not aware of this matter.</i>	a trade union
	<i>We have no direct experience of the ORR's methods, guidance and support in regard to these questions.</i>	A trade union
	<i>i do not deal with this area</i>	A trade union
	<i>Not my area of expertise.</i>	An ORR-recognised occupational health doctor
	<i>Fail on basic physics understanding.</i>	Other - Retired Train Driver
	<i>{redacted} Training centres are out of date on ORR system</i>	A TOC
	<i>I haven't heard otherwise.</i>	Other - Individual response
	<i>The TDLCR requirements existed pre-TDLCR within the companies SMS and therefore add no value (or are extremely difficult to quantify what value they bring)</i>	A TOC
38. Do you think ORR's arrangements (i.e. guidance and other support) for the recognition of medical examiners are effective ?	<i>Not in a position to comment as not a medical examiner</i>	A FOC
	<i>I don't believe they are robust enough initially and the list of ORR doctors is not reviewed at regular intervals</i>	An ORR-recognised occupational health doctor
	<i>Good there is a list – but creates a premium cost as a few approved suppliers, needs to be achievable for suppliers to get recognised and therefore create competition within the market which will help drive down costs</i>	A TOC
	<i>Good medical centres are being utilised.</i>	A TOC
	<i>The ORR has no guidance or support for "their" medical examiners. They don't even employ a medical doctor. They have no interaction with ORR doctors and have no medical knowledge in regard to Schedule 1. I believe it's all done by administrators.</i>	An ORR-recognised occupational health doctor
	<i>Yes, registration of medical practitioners is an improvement</i>	A TOC

	<i>We have no direct experience of the ORR's methods, guidance and support in regard to these questions.</i>	A trade union
	<i>But as stated - need some mitigation or attract more into the resource pool.</i>	A TOC
	<i>in my opinion it is working well</i>	A trade union
	<i>Still have incorrect use of F1 , F2 , U1 , U2 given. {redacted} seem to have their own interpretation</i>	An ORR-recognised trainer/examiner
	<i>I think they were a bit rudimentary. Ideally, with a regular course running on medical fitness for train driving (currently piloted by RSSB) this should form part of the foundation for recognition. This is the best way of ensuring a systematic foundation.</i>	An ORR-recognised occupational health doctor
	<i>The necessary competencies, qualifications and experience are not very well conceived, defined and documented. The route to inclusion on the medical examiner's register is somewhat hit and miss and inconsistent.</i>	An ORR-recognised occupational health doctor
	<i>not standardised sufficiently</i>	An ORR-recognised occupational health doctor
	<i>The information in the Regulations seems clear</i>	Other - Individual response
	<i>see above</i>	An ORR-recognised occupational health doctor
	<i>I am not aware of any support or guidance provided by ORR to medical examiners.</i>	An ORR-recognised occupational health doctor
	<i>The TDLCR requirements existed pre-TDLCR within the companies SMS and therefore add no value (or are extremely difficult to quantify what value they bring)</i>	A TOC
39. Do you think ORR's arrangements (i.e. guidance and other support) for the recognition of psychologists are effective ?	<i>Not in a position to comment as not a psychologist</i>	A FOC
	<i>Good there is a list – but creates a premium cost as a few approved suppliers, needs to be achievable for suppliers to get recognised and therefore create competition within the market which will help drive down costs</i>	A TOC

	<i>See answer to Q29</i>	An ORR-recognised occupational health psychologist
	<i>Yes, registration of Psychologists practitioners is an improvement</i>	A TOC
	<i>We have no direct experience of the ORR's methods, guidance and support in regard to these questions.</i>	a trade union
	<i>as previously answered I would suggest that this process needs some improvement. whilst I understand the need for inclusion we seem to be employing Individuals with learning difficulties similar to the ones my children suffered with and I know from my experience that my children struggled to focus their attention and remain stimulated. I believe that this is something that is not really conducive to train driving and hope that this would not be a factor in a serious rail incident.</i>	a trade union
	<i>More auditing required. Assurance needed that ORR have details of each employer of train drivers use the registered practitioners .</i>	An ORR-recognised trainer/examiner
	<i>I've answered this previously.</i>	An ORR-recognised occupational health psychologist
	<i>Not my field of specific expertise although it is essential to differential between psychometric testing for competence and aptitude rather than specific "medical standards".</i>	An ORR-recognised occupational health doctor
	<i>The mechanical comprehension test was removed, yet it is stated passing of this test produces better drivers.</i>	Other - Retired Train Driver
	<i>not easy to find lists on site and drop down on {redacted} applications for licences long list not easy to scroll</i>	A TOC
	<i>As per my response for Question 38</i>	Other - Individual response
	<i>The TDLCR requirements existed pre-TDLCR within the companies SMS and therefore add no value (or are extremely difficult to quantify what value they bring)</i>	A TOC
40. Do you think ORR's arrangements (i.e. guidance and other support) for maintaining the register of	<i>But improvements could probably be made.</i>	HM Railway Inspector

licenced drivers are effective ?		
	<i>Often don't get any reply at all from the licensing team if asking about validity of a Driving licence, know of at least one Driver who didn't drive for any operator for over 18 months but heard nothing from ORR's licensing team, the regime in the Guidance didn't appeared to be applied.</i>	A FOC
	<i>The registers are quite often out of date even though railway undertakings are expected to send quarterly reports to the ORR updating the information. It would be better if the railway undertakings could access and update the data themselves through the portal as this would reduce the number of information items being lost and therefore reduce some of the administrative burden.</i>	A railway industry body
	<i>Too slow and long winded to get updates</i>	A TOC
	<i>The current database is very difficult to navigate and is time consuming to search and locate Individuals. Operators should have access (in a controlled way) to update and manage data applicable to their operation.</i>	A TOC
	<i>Yes, but the access and accuracy needs to be reviewed, as it could provide additional benefits to industry</i>	A TOC
	<i>Staff are helpful, systems are not</i>	A TOC
	<i>No, however I have asked and managed to obtain our LSL register with assistance to ensure we do a twice yearly check helpful with the ORR staff. We maybe able to provide that each company has a register for staff, but again this is managed and has been for years by HR, along with certificates of competence a list or register of drivers.</i>	A TOC
	<i>Cannot access the portal</i>	A TOC
	<i>Hardly ever up to date</i>	An ORR-recognised occupational health psychologist
	<i>Unable to access the portal</i>	A TOC
	<i>The register of drivers is a useful check and balance for the transfer of safety critical information, however the access and management of this should be reviewed, along with technical compatibility to company systems such as electronic competency management systems</i>	Other - Professional Head of Operational Safety
	<i>We have no direct experience of the ORR's methods, guidance and support in regard to these questions.</i>	A trade union
	<i>This is a very cumbersome process and often relies upon providing email updates without</i>	A TOC

	<i>confirmation that the changes have been applied to the register. It would be a big step forward if nominated people could have access to the register to make these changes directly.</i>	
	<i>Feedback I get is that the process and register is a bit clunky and the interface needs improving</i>	A TOC
	<i>Working within an assessment centre, we hold a database with all applicant details to ensure that we can manage and enforce the 2 attempts policy and 6 month re-test policy. However with GDPR we need to manage this database and remove people as and when required, i.e., if they have retired from train driving. However we have no means with which to do this and therefore it would be advantageous to work more closely with the ORR and their register of licensed drivers.</i>	An ORR-recognised occupational health psychologist
	<i>There is very little documented arrangements or guidance for how this is maintained.</i>	An ORR-recognised occupational health doctor
	<i>Better reporting capabilities required - two way sharing of information</i>	A TOC
	<i>The ORR {redacted} system for licences is not good at all clunky and you cant search even let alone do renewals or duplicates or amendment requests on it. Sending emails for every change or lost licence is time consuming and inefficient</i>	A TOC
	<i>I'm not always clear on what I need to do so have clarified on a couple of occasions with yourselves or our Operational Standards team</i>	Other - Individual response
	<i>No. The system relies on email traffic between both organizations and duplicate data handling by both parties. This would be less of an issue if we were able to update the register ourselves (like {redacted} do with the {redacted} system)</i>	A TOC
41. Do you think ORR's arrangements (i.e. guidance and other support) for reissuing licences are effective ?	<i>Not needed to use that recently</i>	A FOC
	<i>This is a major source of frustration for railway undertakings especially as they wish to plan for the bulk reissuing of train driver licences which will take place on the adversary of the TDLCR. Currently there is no advice or guidance in place to assist railway undertakings in managing this process.</i>	a railway industry body
	<i>Not clear on what will happen as all drivers come to renew the licence as the 10 year anniversary approaches, current system is too manual and</i>	A TOC

	<i>clunky. Burden will end up with the TOCs and create another significant admin issue rather than ORR making the process easier to manage</i>	
	<i>Generic email address is not always answered, licenses can take several weeks to be reissued. Overall needs a review as to how this works.</i>	A TOC
	<i>This creates an additional burden of admin, as the logistics and timing of licence issue requires constant management</i>	A TOC
	<i>The process can be timely.</i>	A FOC
	<i>No issues</i>	A TOC
	<i>Following Q40 it is, but again is the whole process necessary?</i>	A TOC
	<i>Have not required a re-issue</i>	A TOC
	<i>Our response is that the reissuing of licences is not effective because we have been told of delays of between three weeks and four months in issuing new licenses and even as long as 9 months for a replacement to arrive after a wallet was lost. Despite this problem, most drivers are allowed to continue driving because their competency has been recorded on management systems. The question has also been raised about why they are sent through the post?</i>	a trade union
	<i>unable to access the portal</i>	A TOC
	<i>There are some logistic and administration areas that would benefit from a review, including return, change and the level of information required. Often this has not safety critical impact on the driver but adds increased administration to the process</i>	Other - Professional Head of Operational Safety
	<i>We have no direct experience of the ORR's methods, guidance and support in regard to these questions.</i>	a trade union
	<i>Not really sure of the requirements for this yet or how much of an administration requirement it will bring.</i>	A TOC
	<i>can take some time to get a replacement licence</i>	a trade union
	<i>Not my field of expertise.</i>	An ORR-recognised occupational health doctor
	<i>Still awaiting clarity on questions raised around renewal process</i>	A TOC
	<i>At present no - having to email everything is time consuming even with acrobat DC</i>	A TOC
	<i>The process could be made easier as we are having to re-provide a lot of information - new signature, new photo, Driver address to you again when this is on file. If the Driver has changed a considerable amount, then I would expect to send a new photo. A number of Drivers have started wearing glasses so are needing a new ETDL, for one person this is a huge task to approach depots</i>	Other - Individual response

	<i>to request & then chase them up before actually reapplying. It would be helpful if an address other than our HQ & Training Centre could be provided (i.e. the Drivers Depot) to save redistributing. One licence I'd reapplied for got lost this way.</i>	
	<i>No. The system relies on email traffic between both organizations and duplicate data handling by both parties. This would be less of an issue if we were able to update the register ourselves (like {redacted} do with the {redacted} system)</i>	A TOC
42. Do you think ORR's arrangements (i.e. guidance and other support) for issuing licences are effective?		
	<i>Not a training school so don't issue licences</i>	A FOC
	<i>If this question is targeted at new drivers.</i>	a railway industry body
	<i>This seems to be an effective process</i>	A TOC
	<i>This is restricted to only two users and can take several weeks to complete. During the trainee driver process there is plenty of time to complete this so it is done early to ensure that licenses are issued prior to them being needed.</i>	A TOC
	<i>See answer above</i>	A TOC
	<i>No issues generally however an editable template for the complementary certificate when it is a requirement would be beneficial</i>	A TOC
	<i>See Q41 for similar answer</i>	A TOC
	<i>Prompt service which have always been 100% correct</i>	A TOC
	<i>They are generally okay (estimated at 95%) noting the caveats at Questions 41 and 43</i>	a trade union
	<i>unable to access the portal. All {redacted} applications are emailed to the ORR</i>	A TOC
	<i>We have no direct experience of the ORR's methods, guidance and support in regard to these questions.</i>	a trade union
	<i>This has improved a lot since the early days</i>	A TOC
	<i>Not my period order of expertise.</i>	An ORR-recognised occupational health doctor
	<i>System used is clunky and labour intensive.</i>	A TOC
	<i>You cannot tell at present if when you apply on the {redacted} whether it has gone through or been processed - then there is a long wait from Printers</i>	A TOC
	<i>It is clear what is required.</i>	Other - Individual response

	<i>No. The initial application via the portal is fine, but updates or renewals relies on email traffic and paper form filling between both organizations and duplicate data handling by both parties. This would be less of an issue if we were able to update the register ourselves (like {redacted} do with the {redacted} system)</i>	A TOC
43. Do you think ORR's arrangements (i.e. guidance and other support) for reinstating licences are effective ?		
	<i>This seems to be an effective process</i>	A TOC
	<i>This can be a very long-winded process, needs to be much simpler and could be a command within the data base that operators are able to action.</i>	A TOC
	<i>Never had reason to do this</i>	A TOC
	<i>Not yet been required</i>	A TOC
	<i>Have not used this</i>	A TOC
	<i>{redacted} have not had to request remove a license</i>	A TOC
	<i>We have no direct experience of the ORR's methods, guidance and support in regard to these questions.</i>	A trade union
	<i>can always improve a process and make it smoother</i>	A trade union
	<i>Not my period order of expertise.</i>	An ORR-recognised occupational health doctor
	<i>System relies on the ORR letting me know by email when they have Suspended a licence then when the drivers are ready to return it relies on me emailing to say they have done the retraining to get it re-instated – which relies on ORR receiving and replying to emails – which can take days</i>	A TOC
	<i>I've never been involved in this so unable to comment, sorry</i>	Other - Individual response
	<i>Never had to use this process</i>	A TOC
44. Do you think ORR's arrangements (i.e guidance and other support) for the appeals process for suspended or withdrawn	<i>Often don't get any reply at all from the licensing team if asking about validity of a Driving licence, know of at least one Driver who didn't drive for any operator for over 18 months but heard nothing from ORR's licensing team, the regime in the Guidance didn't appeared to be applied. So from what I have seen the process is not effective anyway.</i>	A FOC

certificates are effective ?		
	<i>It should be easier for railway undertakings to identify when a train driver license has been withdrawn.</i>	a railway industry body
	<i>Process is fine – Portal needs improving it all links to above comments</i>	A TOC
	<i>Never had reason to do this</i>	A TOC
	<i>Never been tested.</i>	A TOC
	<i>Not yet been required</i>	A TOC
	<i>Have not used this but have viewed the arrangement & feel they are acceptable</i>	A TOC
	<i>This aspect is usually dealt with at a more senior level than that of Driver Manager (eg, Head of Drivers or Head of Safety).</i>	a trade union
	<i>Guidance is suitable</i>	A TOC
	<i>We have no direct experience of the ORR's methods, guidance and support in regard to these questions.</i>	a trade union
	<i>I think the process is clear enough but it would be useful if we could have feedback on the status of a driver's licence once this process has been applied. It would also be useful to have feedback on the information we have supplied to support the process (was it sufficient, too in depth etc...)</i>	A TOC
	<i>I have not dealt with this area,</i>	a trade union
	<i>I am not aware of the process for appealing medical decisions which needs to be more consistent and transparent for individuals who feel they have been unfairly assessed. This is a tenant of natural justice and should not be left up to the individual medical providers to deal with their own internal appeals. There needs to be an outside agency to determine how the medical standards are being interrupted.</i>	An ORR-recognised occupational health doctor
	<i>As per my answer to Question 43</i>	Other - individual response
	<i>Never had to use this process</i>	A TOC
45. Do you think any other ORR arrangements are effective ? (please specify)	<i>The ROGS requirements for Safety Certificate and inspection of that (including competence management) in my view form the effective regulation of all safety critical competence including Driving. Given the content of that regime including the application of it before TDLCR came out, it is difficult to see what TDLCR added as the ROGS inspection regime was already ensuring standards were/are appropriate for train driving. ORR would do better to scrap TDLCR and focus more resource into the already-effective ROGS certification/ inspection regime.</i>	A FOC
	<i>In the main they are. The guidance for Operators is very useful. However, the {redacted} falls into an almost unique category where it operates on the</i>	Other - Heritage Railway Operator

	<i>mainline with an exemption. We are specified by the ORR as required in the Regulations, however the guidance lacks clarity around this.</i>	
	<i>The overall process is an administrative nightmare, it should be possible for the portal to be designed that would enable the users of the system to update the information that they hold directly, upload photographs, etc directly and not have to constantly have to obtain signatures, etc. the system requires a digital transformation! This would not only directly reduce the administrative burden but indirectly as well as it would result in a reduced number of items being lost or going missing.</i>	a railway industry body
	<i>I believe that the ORR would benefit from a medical examiner. When I was implementing a post Brexit cross border medical assessment process a dedicated medical advisor would have been very helpful. This was a process without precedent and I found it very difficult to get advice. In addition some of the ORR guidance medical advice for OH providers for train driver assessments has, in my view, not been evidence based or given from an informed position. e.g. the definition of 'a general medical examination'.</i>	An ORR-recognised occupational health doctor
	<i>The update of licences for changes should be simplified to reduce the admin required, and emphasis placed on the Individual to do this rather than the company in a similar way to the car driving licence</i>	A TOC
	<i>Is this referring to ETDL guidance or other ORR documents?</i>	A TOC
	<i>The management of the portal would benefit from a review, including technical compatibility or integration with other systems, such as electronic competency management systems, HR systems etc as many are common to most railway operators</i>	Other - Professional Head of Operational Safety
	<i>We have no direct experience of the ORR's methods, guidance and support in regard to these questions.</i>	a trade union
	<i>Think too much reliance is left to the employer of train drivers with little involvement of the ORR</i>	An ORR-recognised trainer/examiner
	<i>I've had no issue personally</i>	Other - Driving Standards Manager
	<i>You fail to enforce schedule 3 and schedule 1, understand brake performance calculation inter alia.</i>	Other - Retired Train Driver
	<i>not at present</i>	A TOC
	<i>I can't think of any other arrangements not covered</i>	Other - Individual response

	<i>I think these regs add a huge administrative burden to ORR as well as the TOCS, there is a lot of double data handling from one system to another and use of paper-based forms. This has a real potential for errors to occur.</i>	A TOC
46. Do you have a view on the appeal process to the Secretary of State which is available to train drivers whose licence has been suspended or withdrawn by ORR?		
	<i>It would be helpful if it was a little more transparent!</i>	a railway industry body
	<i>Is it required?</i>	A TOC
	<i>Not yet been required</i>	A TOC
	<i>The Driver Managers at our meeting have never used the process and very few are aware of it.</i>	A trade union
	<i>I understand the appeals process, however the final decision for obtaining and keeping a licence should remain with the duty holder who is initially confirming this has been achieved, or responsible for the ongoing confirmation this is maintained. Where the driver has been unable to faithfully and consistently discharge their safety responsibility as a train driver the final decision should remain with the duty holder.</i>	Other - Professional Head of Operational Safety
	<i>We have no direct experience of the ORR's methods, guidance and support in regard to these questions.</i>	A trade union
	<i>It's not something we see much of although I have been involved in one appeal, but didn't get to hear the outcome.</i>	A TOC
	<i>I am currently booked off as "unfit to drive trains" because of the corrective lens strength limits imposed by the TDLCR. 20 years without a vision related safety of the line incident and I'm now unfit!!!</i>	a train driver
	<i>I think someone needs to have the final say on this process whether that needs to be the secretary of state I am not sure</i>	a trade union
	<i>Everyone has a right to an appeal</i>	Other - Driving Standards Manager
	<i>It should be put before a judge like any other licence removal</i>	a train driver
	<i>I'm not sure the Secretary of State would be the best person to comment on any such appeal as they rely on the Civil Service for advice! Perhaps a panel of experienced TOC/FOC Directors or Heads of who were Drivers would be better but I</i>	Other - Individual response

	<i>appreciate the Regulations would need to be amended for this to happen</i>	
	<i>Just my view but seems a lofty elevation to make. Maybe a cross industry panel could be formed to decide?</i>	A FOC
47. Is there anything else you would like to comment on which is relevant to this post implementation review of TDLCR?	<i>We believe that a full review of the classification of train drivers licences should be undertaken. It would be better if the Class of Licence was more aligned to the stages of competence required by a train driver.</i>	a railway industry body
	<i>The survey questions appear loaded to try to get a positive response to keep the TDLCR. Our overall position is that the TDLCR are an unnecessary regulatory burden which place a disproportionate cost on small freight operators (bearing in mind that most freight operators are NOT subsidised by the government the way most passenger operators are) whilst doing little if anything to improve safety. The ROGS regime adequately covers ALL other safety critical jobs/tasks and we see no reason why Driving should be an exception. The focus on TDLCR can also take focus off other training for other tasks and roles, which is perhaps why in so much of the train operator sector the standard of PTS training in the train operator sector is substandard compared to {redacted} Sentinel regime. The TDLCR tend to favour the bigger operators particularly due to the traction training coming under the "recognised training centre" regime. With the availability of traction extremely limited (and potentially what is available is a bit exotic) this can act as a barrier to entry and a driver for a handful of big operators to maintain a monopoly position. The TLDCR can also increase training costs for new traction in the passenger sector as there is effectively double handling of "static traction training" then further TOC sign off. If the ORR insists on keeping the TDLCR then they should (a) explicitly remove traction training from the scope and (b) do far more inspection of the training schools of the big operators to ensure they really are doing the training properly. Ultimately, in our view the prescriptive TDLCR regime which is not properly followed anyway is no substitute for the ROGS regime when robustly checked by competent inspectors on the ground. Whilst the TDLCR no doubt make it easier for cross-channel</i>	A FOC

	<i>operators, these are a minority in the context of both freight and passenger operators.</i>	
	<i>Recently, a number of photographs have been rejected as they do not show a train driver wearing spectacles when the medical has indicated that they should be worn. This seems to be a change in guidance that has been imposed on railway undertakings without notice and has created yet more administrative burden for railway undertakings. We also believe a better classification definition between a Licence Holder Class A and a Licence Holder Class B should be in place which more reflects the roles carried out by train drivers in their various forms.</i>	a railway industry body
	<i>A train driver license should be listed as a recognised form of identification similar to a car driving license as it is issued by the same organisation.</i>	A TOC
	<i>The TDLCR should be reviewed with a scope to withdraw as it's not applicable for domestic operators within the GB mainline railway. Aspects such as a centralised register of drivers provides a value, but other aspects should be withdrawn as they provide a cost and admin burden without any current demonstrable benefit. This aligns to the Shapps Williams review of reducing unnecessary costs for the industry</i>	A TOC
	<i>The list of psychologists is rarely up to date and generally inaccurate (and misleading) as psychometric assessor are not psychologists.</i>	An ORR-recognised occupational health psychologist
	<i>{redacted} members would not like to see a totally new system introduced because it took a lot of effort to get the existing one set up and working. Our comments are about aspects of what could be improved.</i>	a trade union
	<i>we would the ability to amend any changes to the TDL information rather than applying to the ORR. ORR confirmation of changes is inconsistent. This would provide flexibility and expediency of change to the TOC</i>	A TOC
	<i>Many of the principles of the TDLCR were in place prior to their introduction, such as consistency in train driver recruitment, training, initial certificates of competence and management of ongoing competence, transfer of safety critical info for leavers/ joiners etc. These were and are still managed through industry standards, industry guidance and historically codes of practice. Most of these process and arrangement have continued, with the TDLCR providing little or no additional demonstrable safety benefit, therefore the TDLCR</i>	Other - Professional Head of Operational Safety

	<i>continued applicability to UK mainline domestic operations should be reviewed</i>	
	<i>Please don't devalue the role of train driving with the lowering of standards for political purposes.</i>	a train driver
	<i>We have recently seen a number of photos rejected because the driver wasn't wearing glasses in the photo where then their application states these are required. Really not sure why this is required. Drivers may predominantly wear contact lenses. Does this also apply to the wearing of hearing aids? Should these be visible in the photo? On a wider point, it's an example of interpretation that has been changed without notice that has caused some delay in the application process. If it genuinely is required then it should be contained within the guidance.</i>	A TOC
	<i>The process needs to be streamlined and costs reduced for the industry. If this is done I think there is a longer term future for TDL</i>	A TOC
	<i>I am currently booked off as "unfit to drive trains" because of the corrective lens strength limits imposed by the TDLCR. 20 years without a vision related safety of the line incident and I'm now unfit!!!</i>	Other - a train driver
	<i>I have made formal complaint to the HSE regarding non-compliance. I have also made formal legal statement.</i>	Other - Retired Train Driver
	<i>Have the Regulations done what they set out to do & are they still relevant? Clarity on the process of reapplying near to the 10 year TDL expiry date would be helpful, please. Are there any plans to charge a Driver or TOC/FOC for lost/stolen TDL's?</i>	Other - Individual response
	<i>Consider implementing a universal drug and alcohol policy, having clear medical standards and clear process where medical examiners can get support and guidance</i>	An ORR-recognised occupational health doctor

Annex 3 – Explanatory Notes

Note for all charts

The visual charts shown for each question are for illustrative purposes only and should be viewed in conjunction with the data tables also provided.

Explanatory Note for Question 1:

This question asked for each respondents for their full name, job title, e-mail address and telephone number. It also asked whether the responses was being made on behalf of an organisation, and if so, the name of the organisation. The contact detail information is not repeated in Annex 1. The names of the organisations are also not reproduced, but the types of organisation are shown in the answer to Question 2.

Explanatory Note for Question 2:

By the close of the online evidence gathering survey, 68 responses had been submitted. However, 13 of these responses were either completely blank ('nil responses') or had only answered the 'About you' section ('non-material response'). These responses were not included in the analysis phase. To be clear, respondents who answered any of the material survey questions – even incompletely - were fully included in the PIR analysis and in this report. Therefore, 55 responses from the survey were included in the analysis which informed the final PIR report.

We received two responses from Great Western Railways, East Midlands Railway, Northern Trains Limited and BD Cargo (UK) Ltd. These responses were from different people but within the same F/TOC – which was allowable within the online survey – and therefore both sets of responses from the same F/TOC were included in the PIR analysis. We initially received four responses from Govia Thameslink Railway (GTR). One of these responses was subsequently clarified as being an Individual response from a senior manager and one was re-categorised to an 'an industry body' response (see points 1 and 3 below). Therefore, two responses were categorised as from GTR in the final analysis. We also received two responses from The Transport Salaried Staffs' Association (TSSA).

A small number of responses were unclear in respect of whether or not it was a response on behalf of an organisation. Additionally, some responses required clarification about the category of organisation which had been selected. We contacted eight respondents about the points we needed clarifying. The following clarifications were received:

1. A respondent from a TOC clarified that their completed survey should be changed to 'not from an organisation' and categorised as 'Other – Professional Head of Operational Safety';
2. A respondent who initially stated their survey response was from a TOC organisation clarified it should be re-categorised as an organisational response from "Other – Other - Heritage Railway Operator";

3. A respondent who initially stated their survey response was from a TOC organisation clarified that it should be re-categorised as an organisational response from “An Industry Body”;
4. A respondent who initially stated their survey response was not from an organisation clarified that it should be changed to a response from an organisation and categorised as “Other – Railway Contractor” and “Other-Driving Standards Manager”;
5. A respondent who initially indicated that they were responding as a TOC and ORR recognised trainer/examiner clarified that they were not responding on behalf of any organisation and should only be categorised as an “ORR-recognised trainer/examiner”;
6. A respondent who initially indicated that they were responding as a TOC clarified that they were not responding on behalf of an organisation and should be categorised as “Other – Individual”;
7. A respondent who initially stated their survey response was not from an organisation clarified that it should be changed to a response from an organisation and categorised as a ‘FOC’ and ‘ORR recognised training and examination centre’;
8. One respondent selected train driver and responding on behalf of a FOC organisation. However, the responses to each question were specific to the driver’s employment. We contacted the driver to confirm whether the response should be categorised as an Individual response from a train driver. We did not receive a response, but we were not confident that the response could accurately be categorised as being made on behalf of a FOC organization. It was therefore re-categorised to a response not made on behalf of an organization, ‘train diver’.

Following these clarifications and subsequent adjustments as set out above, the table below shows the categorisations used in the analysis for the TDLCR PIR.

Category	Number of times this category was selected by respondents answering on behalf of an organisation	Number of times this category was selected by respondents not answering on behalf of an organisation
A Train Operating Company (TOC)	19	0
A Freight Operating Company (FOC)	4	0
A Railway Infrastructure Manager (IM)	0	0
A Rolling Stock Leasing Company (ROSCO)	0	0
An ORR-recognised occupational health doctor	1	8
An ORR-recognised occupational health psychologist	2	0
An ORR recognised trainer/examiner	1	1
An ORR-recognised training centre	3	0
A railway industry body	4	0
A trade union	3	0
A train driver	0	4

Other – A Other - Heritage Railway Operator	1	0
Other – Railway Contractor	1	0
Other – Driving Standards Manager	1	0
Other - TOC TDL administrator/ACMS Administrator	1	0
Other - ORR Railway Inspector	0	1
Other - member of the public	0	1
Other – Railway Consultant	0	1
Other – Individual response	0	1
Other – Other - Retired Train Driver	0	1
Other – Professional Head of Other - Professional Head of Operational Safety	0	1

Note: the total number of category selections is greater than the number of responses (i.e 55) because respondents were able to select more than one category. For example, a TOC may also want to also respond as an ORR-recognised training centre. The analysis of the responses in the PIR took account of all the selections made.

Explanatory Note for Question 3

We received 27 responses to this question. However, nine responses were adjusted for the following reasons. We received two responses from two TOCs who gave slightly different driver figures. We therefore took an average and only counted one response. We also received four responses who only answered the non-material questions (including question 3) but provided no responses for every other question asked. One response was simply to state that the number of drivers was not known and another from a trade union explained that they were not providing figures. One respondent had already stated that they were not replying on behalf of an organisation, but still provided a licenced driver number. Finally, one response explained that the figures were not known at the time of completing the survey.

Explanatory Note for Question 5

54 respondents answered this question. However, two respondents submitted two answers. Therefore, the total number of answers shown is 56.



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