

Public Services member briefing, June 2025

Questions and answers

Q: If using tachograph to record drivers' working/driving time, should the Vehicle Unit be set to the 'out of scope' flag on the drivers' card, as a way of identifying they are operating under GB domestic, or is this not necessary?

A: Yes, the tacho needs setting to 'out of scope' once the driver card is inserted to indicate domestic hours. See the fact sheet for more details.

Q: For international CPC why is the maximum set to 12 hours for e-learning, as this doesn't amount to two full days when seven hours is required to qualify for one day?

A: For international CPC, you can complete up to two hours e-learning which has to be followed by five hours 'tutor lead' learning to qualify.

For national CPC, the 3.5 hour e-learning courses don't add up to 12 hours and we are unsure why.

Q: So just to clarify that a 4.25-t EV vans do NOT need to be on the operator licence, do not require six week inspections, and are exempt from drivers hours rules in the UK?

A: Yes, normally exempt from operator licensing if operated within Great Britain and therefore the requirement for PMIs.

However, bear in mind that if you have HGV's on an operator licence, the roadworthiness condition of your light vehicles could have an influence on the perception of your overall maintenance arrangements and systems.

With drivers' hours, they are only exempt assimilated drivers' hours rules if used within a 100km radius, but they would still come under domestic drivers' hours rules.

Q: Are there any exemptions that apply regarding the laden brake testing of refrigerated trailers? I believe there were concerns raised about the risk of cross-contamination of foodstuffs.

A: This would be down to a risk assessment, which demonstrates that it is burdensome to put a test load in the trailer. If you are carrying palletised goods, it may be difficult to demonstrate that.

Q: Are sewage tankers exempt please from laden brake testing?

A: It would depend on the outcome of your risk assessment. The load may come under the 'noxious load' element and how your maintenance provider deals with the risk presented by the load in the tank.

Q: Do highway sweepers need to have an operator licence?

A: Not normally as they have 'a machine or apparatus to sweep mud or other matter from the surface of a road', qualifying for an exemption.

Q: National driving CPC is it 35 hours over five years too?

A: Yes it is.

Q: Do 4.25t AFVs fall into HGV PMI's as well?

A: Not normally as they are exempt from operator licensing. However, if you have HGV's on an operator licence, the roadworthiness condition of your light vehicles could have an influence on the perception of your overall maintenance arrangements and systems.

Q: Does a seven hour course count as two national CPC courses?

A: Only if the courses are designated and recorded as two national DCPC courses.

Q: Do refuse collection vehicles that are exempt from being loaded still have to be done on a roller four times a year as well?

A: Although they are not required to be roller brake tested laden, the brake performance must be assessed at every safety inspection and a risk assessment completed to indicate the reason why a laden brake test was not completed.

Q: What the assimilated drivers' hours rules are?

A: DVSA are referring to what were the EU drivers' hours rules as assimilated drivers' hours rules, and updated their guidance in April to reflect this. As a result, we refer to those sets of rules as assimilated and will update our publications accordingly.

Q: Can we use drivers with a National Driver CPC if they hold an international operators licence?

A: Yes, a driver with a National Driver Qualification Card can drive for an operator who holds a standard international operator licence, but that driver would not be permitted to travel into Europe themselves, so would only be able to drive in the UK.