

Rail Partners response to the Department for Transport's consultation on Lowering the minimum age requirement for train drivers from 20 to 18 years

About Rail Partners

Rail Partners represents private passenger train operating company owning groups and freight operating companies – providing policy and advocacy functions on their behalf. We also provide technical services to train operating companies in both the public and private sectors. This response draws, in particular, on the experience and expertise of our TOC members in training and supporting new drivers.

Introduction

Rail Partners welcomes the opportunity to respond to the Department for Transport's (DfT) consultation on lowering the minimum age requirement for domestic train drivers from 20 to 18 years.

As the consultation document acknowledges, the UK rail industry has an ageing driver workforce, with an average driver age of around 48. As a result, it is estimated that the rail industry will need to recruit 5,000 new drivers over the next five years. The railway also faces challenges in encouraging women and people from diverse backgrounds to consider becoming train drivers. Consequently, Rail Partners and our members support the lowering of the minimum age requirement for train drivers from 20 to 18 years which we believe would support a more diverse and younger workforce by:

- Encouraging more school and education leavers to train as drivers through apprenticeships;
- Increasing the number of staff joining the driver grade at the start of their first career - currently train driving is often a second career because the minimum age is 20;
- Increasing the diversity and size of the train driver candidate pool; and
- Helping to tackle the skills shortage resulting from an ageing train driver workforce.

The Train Driving Licences and Certificates Regulations (TDLCR) were derived from EU law, and were supported by a 2007 Directive which sought to increase harmonisation. Current UK legislation does not align with the EU legislation on train driver age requirements despite the directive clarifying that "*a Member State may issue licences to applicants from the age of 18 years*", providing the licence is limited to their own territory. In addition, the current domestic driver minimum age is not aligned with driver age limits in other transport modes such as HGVs and buses.

The Rail Safety and Standards Board (RSSB) has undertaken research at industry's request showing that the minimum age of a GB train driver can be safely reduced from 20 to 18. This research showed that age is not a reliable predictor of road or train driving performance. Instead, the development of experience is a key factor in how drivers perform regardless of whether their

age is 18 or 20 or older. This is because exposure to, and experience of, different train driving situations develops the technical skills, knowledge and non-technical skills required for safe train driving.

Passenger and freight operators already run rigorous training programmes and will continue to adapt these programmes in-line with best practice and business requirements. As such, Rail Partners considers that the proposed change in legislation to reduce the train driver minimum age does not require additional legal requirements for training younger drivers as this would create unnecessary administrative burden.

Further discussion

Rail Partners and its members would welcome further discussions with the DfT to support the implementation of the proposal to lower train driver age requirements.

Rail Partners response to consultation questions

1. Do you agree or disagree with lowering the minimum age requirement for train drivers from 20 to 18?

Rail Partners supports the proposal to lower the minimum age requirement for domestic train drivers from 20 to 18 and has recommended this change to government for some time. We do, however, believe that a minimum age of 20 should be retained for international drivers matching EU legislation.

If implemented, do you agree or disagree that there should be a period of enhanced supervision for drivers aged between 18 and 20?

Rail Partners agrees that enhanced supervision for drivers aged between 18 and 20 should be in place as is the case with any newly qualified driver. However, this should be provided through the current robust systems used to supervise and monitor drivers rather than from any additional legislative requirements.

The industry already has processes for newly qualified train drivers to have additional supervision and monitoring irrespective of the age that they have qualified. This enhanced supervision takes place for the first two years after the driver has qualified. Trains also have On-train Data Recorders (ODR) and train management systems that are used to monitor drivers. The monitoring of train drivers is a core part of passenger and freight operators' safety management systems which would be reviewed for the introduction of younger drivers.

The nature of train driving operations can vary markedly across train services with different speeds, rolling stock, routes, and weights. There are also a wide variety of commodities transported by freight services. Depending on the type of operation, different levels of experience and additional competencies are likely to be required. It will remain the role of passenger and freight operators to recruit and train drivers accordingly to ensure that they have the competencies required to drive different types of service.

2. How long do you think an enhanced supervision of younger drivers should be for?

Enhanced supervision of newly qualified drivers is already two years which, for most younger drivers, would mean that they will have enhanced supervision until they are 20 years old. The younger demographic risk should be assessed by each operator as part of their current safety management systems with any additional controls implemented by operators as a result of any assessed change to the risk profile.

3. Do you think the process for selecting, training and monitoring train drivers should be changed to support the change in minimum age requirements?

No as train drivers already undergo robust selection and recruitment processes using psychometric assessments that test the skills required to be a train driver along with the need to meet the required industry medical standards. The training is currently a mixture of theoretical and practical training followed by a period of building up experience with an instructor. The training would be suitable for younger drivers aged 18 years old and above although the industry is keen to evolve the training to suit modern educational approaches.

4. With regards to making, if implemented, the change to minimum driver age by summer 2024, do you agree with this timeframe? Or would you choose to do it sooner or at a later date?

Rail Partners supports the prompt implementation of this legislative change though we recognise that the timescales proposed in the consultation will be affected by the general election. It is unlikely that younger drivers would be recruited immediately as operators would review and refine their recruitment and training approaches as necessary before onboarding trainee drivers.

In addition Rail Partners would like confirmation that this change will apply to Northern Ireland as well as to Great Britain