

Review of the Irish Transport Manager Certificate of Professional Competence Programme

Final Report

March 2023



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Executive Summary

Executive Summary

Introduction

This report has been produced by Grant Thornton following a request by the Department of Transport (DOT) for the provision of consultancy services for a review of the Transport Management Certificate of Professional Competence (TM CPC) programme.

The primary objective of the project is to assist the DOT in establishing the best course of action for the development of the TM CPC programme in Ireland. To form the final report, Grant Thornton have completed a current state assessment of the TM CPC programme in Ireland through examination and evaluation of the current training manual, the 2022 addendum, the examination question bank and the European Union (EU) regulation (EU 1071) which regulates the programme. Furthermore, Grant Thornton have also conducted a total of 18 consultations with a range of stakeholders including Irish professional bodies, training providers, representative bodies, road haulage operators, passenger transport operators and international representatives, including those from EU Member States.

The research undertaken assisted with the identification and creation of five distinct models which were critically evaluated. The critical evaluation of all five models led to the formation of Grant Thornton's suggested model or sixth model (as outlined on page 44 of this report).

Project Background

The DOT are responsible for transport policy and for overseeing transport services and infrastructure in Ireland. The DOT's mission is to deliver an accessible, efficient, safe and sustainable transport system that supports communities, households and businesses.

Within the DOT, the Road Transport – Operator Licencing & Freight Policy Division is responsible for the licencing of the commercial road transport sector in Ireland. This includes the licensing of operators engaged in the transport for hire or reward of:

- goods in vehicles with a maximum authorised weight above 3.5 tonnes (i.e. Heavy Goods Vehicles);
- international transport of goods in vehicles with a maximum authorised weight above 2.5 tonnes (light commercial vehicles); and
- passengers in vehicles equipped to carry nine or more individuals excluding the driver (i.e. Large Public Service Vehicles).

There are approximately 3,800 licenced haulage operators in Ireland, with a total fleet of 23,000 authorised vehicles. On the passenger side, there are approximately 1,500 licenced operators, with 12,000 authorised vehicles. Road Transport Operator Licences are typically valid for a period of five years and are not required for own account operations.

Applicants for, and holders of, a Road Transport Operator Licence must satisfy a number of EU-wide regulatory requirements. It is necessary for affected persons to prove that they, or their company, have the sufficient professional competence to run their business effectively and efficiently. This can be fulfilled either by having a nominated transport manager who has a genuine link to the transport undertaking, or by appointment of an external transport manager. The nominated transport manager must hold the TM CPC. The nominated transport manager is registered by the DOT as a relevant person in the licence record.

The current TM CPC programme requires a minimum of 100 hours of tuition to be made available to each student prior to sitting the exam. Students must attend a minimum of 75% of class hours. Evidence of attendance must be maintained and submitted for inspection to the Chartered Institute of Logistics and Transport (CILT), the current awarding body for TM CPC in Ireland.

There are two exam papers, worth 400 marks each, which need to be passed to attain the TM CPC. The pass mark for both papers currently stands at 60%. Each training provider is instructed by CILT to teach the syllabus from a training manual. The latest edition of the training manual was published in 2018 and is currently accompanied by an addendum, last updated in 2022. The addendum is provided to exam candidates to replace and update the following sections:

- Access to the market [Sections 3.1 & 3.2].
- Vehicle Weights & Dimensions [Sections 6.1.17 – 6.1.20 & 6.2.4].
- Driving Hours & Tachograph Regulation [Section 9.2 – 9.10].

Exam candidates currently expect to see questions on the content within the 2018 training manual in tandem with the updated material outlined in the 2022 addendum. Frequent changes in EU regulations require the training manual to be regularly updated which has resulted in the need for a supplementary addendum.

Executive Summary

Project Rationale

With effect from 21 May 2022, the EU regulation on operator licencing has changed. There is now a requirement for a Road Transport Operator Licence for the international transport of goods for hire or reward using light commercial vehicles with a maximum authorised weight above 2.5 tonnes. Given this regulatory change as well as other considerations outlined below, it is now timely for the DOT to review the TM CPC programme to ensure it is fit-for-purpose in future years.

Additionally, the European Commission's (EC) Mobility Packages, a collection of three packages, influences major changes to EU road transport. These initiatives detail many aspects of the transport industry's activities from social and regulatory issues to enforcement and technical issues. Of these packages, Mobility Package 1 focuses on the functioning of the road transport market, the working conditions of drivers and road charging in the EU. Given the number of changes that have and are expected to come into effect which impact the road transport sector, it is prudent to review the current TM CPC programme in Ireland and to establish the most appropriate course of action for further development.

CILT have developed a number of suggested amendments to the current TM CPC programme and have presented these proposals to the DOT. To consider the proposals put forward and to investigate and identify other opportunities and amendments to the programme, the DOT have engaged with Grant Thornton to support a thorough review of the TM CPC programme.

Project Objectives

The DOT engaged Grant Thornton to review the TM CPC programme and to provide options as to the best course of action for future programme development.

This report has been developed following an evaluation of the TM CPC programme including:

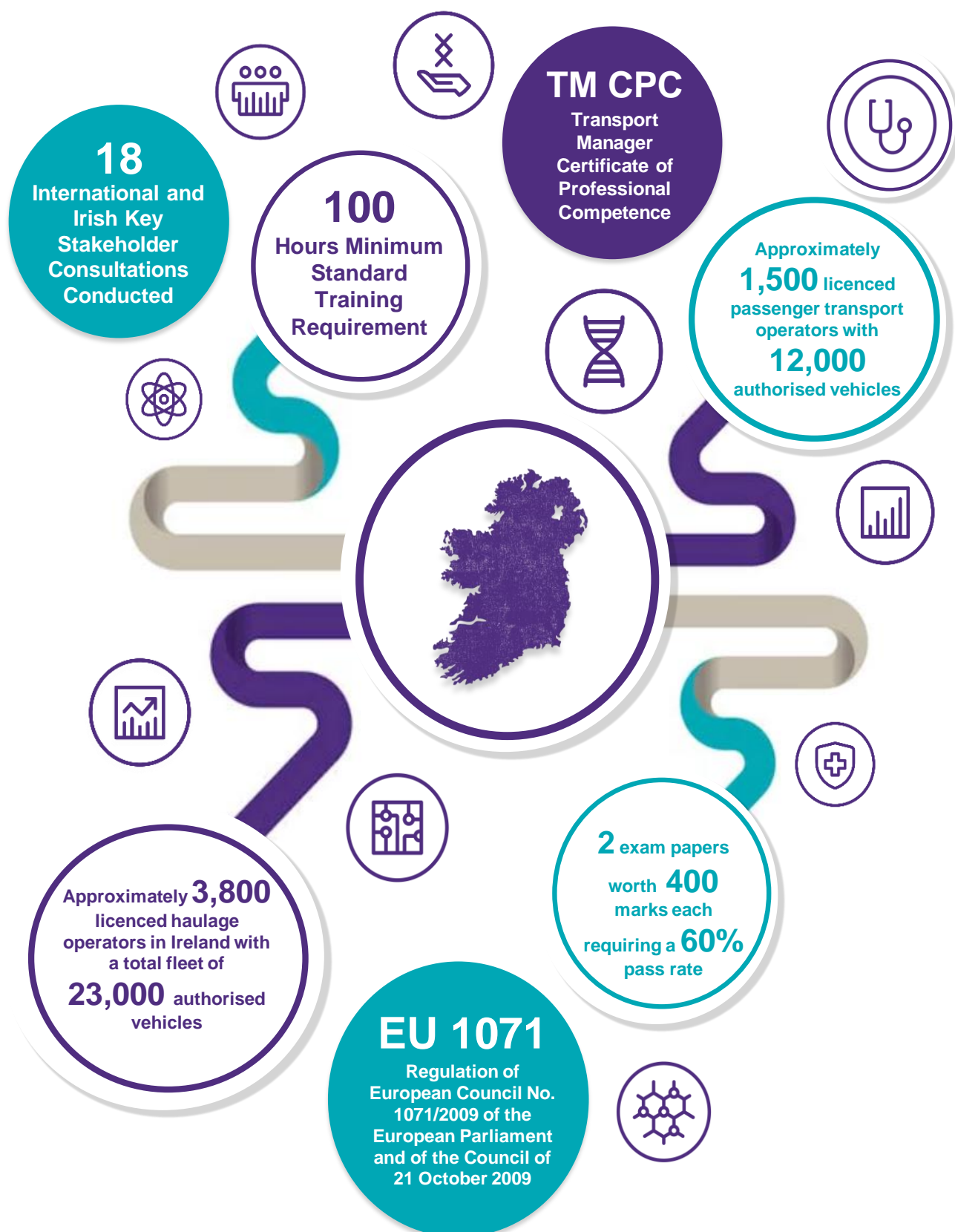
- the examination of the current state and a proposal submitted by CILT;
- the examination of the current training manual and exam question bank; and
- a review of the TM CPC policies and procedures in other EU Member States and in the United Kingdom (UK).

Within this report there are chapters covering the various models identified by Grant Thornton which the DOT could consider for the development of the TM CPC programme in Ireland. The models within this report are assessed by syllabus, oversight, training, exam administration, entry requirement, continuous professional development (CPD) and cost.

In addition, Grant Thornton also examines the position of the TM CPC programme in other EU Member States and the UK. Grant Thornton evaluates their policies and procedures with the use of a strength, weakness, opportunities and threats (SWOT) analysis. A special focus on the minimum standard training requirement prior to sitting the TM CPC exam in other countries added to Grant Thornton's final suggestion. The current training requirement standard in Ireland and other alternatives are assessed and critically evaluated as part of this report.

Finally, Grant Thornton also examines the position in other countries regarding the provision of continuous professional development and refresher training. Through an extensive consultation process with key countries, Grant Thornton identifies appropriate policies and procedures regarding re-certification and CPD.

Key Background Information





European Benchmarking

European Benchmarking

Overview

Ireland conforms to the standards set out in Regulation (EC) No. 1071/2009 of European Parliament and of the Council of 21 October 2009 as amended by Regulation (EU) 2020/1055. These regulations establish common rules concerning the conditions to be complied with in order to pursue the occupation of transport manager for a passenger transport and/or road haulage undertaking.

According to the regulation, such common rules contribute to the achievement of a high level of professional qualification for a transport manager. In addition, the rules set out in EU 1071 also contribute to the rationalisation of the market, improvements in road safety and an improved quality of service in the interest of the user of such services. All road transport operators must hold a Road Transport Operator Licence and to do so must satisfy the requirements as laid down in EU 1071. International operators are also issued with a community licence, allowing them to operate between and within EU Member States and the UK.

It is the responsibility of Member States to verify that an undertaking satisfies, at all times, the conditions laid down in the regulation so that competent authorities of that Member State are able, if necessary, to suspend or withdraw the undertaking from the market. The national authorities, such as the Irish DOT, have a crucial role to play in this respect and it is appropriate to ensure that they take suitable measures if necessary to regulate undertakings within the State. EU 1071 states that all road transport operators must designate at least one person as transport manager who must satisfy the requirements of professional competence.

In order to satisfy this requirement, the transport manager must possess the knowledge corresponding to the subjects listed in Annex I. of EU 1071. The subjects are listed as follows:

- | |
|---|
| 1. Civil law |
| 2. Commercial law |
| 3. Social law |
| 4. Fiscal law |
| 5. Business and financial management of the undertaking |
| 6. Access to the market |
| 7. Technical standards and technical aspects of operation |
| 8. Road safety |

Benchmarking Methodology

The approach for this report involved an extensive consultation process with a number of key stakeholder groups, including those from other European States. As part of this process, Grant Thornton conducted 18 consultations in total, five of which were with relevant authorities from other European States. The EU Member States Grant Thornton consulted with include Latvia, Sweden, the Netherlands and France. Grant Thornton also consulted with the UK which, since 31 January 2020, is not deemed a member of the EU.

In order to gather the sufficient level of detail required to support a final suggestion, a set of questions were developed for all international consultations. This standard set of questions was followed to ensure that the qualitative data gathered could be compared and contrasted in parity with each stakeholder group. The questions broadly reflected a SWOT analysis whereby all stakeholder groups were asked to assess their own current TM CPC programme and provide insights as to any risks or opportunities which should be considered as part of this review for Ireland.

The observations and recommendations provided to Grant Thornton from the international stakeholders are used to formulate models which the DOT should consider. The models are comprised of the main strengths identified in each stakeholder group, taking into consideration various suggestions and recommendations offered during the consultation process.

Themes

On completion of all international stakeholder consultations, Grant Thornton conducted a rigorous analysis of the qualitative data. Several themes were identified for each stakeholder group from the qualitative analysis. The themes identified are the areas of most concern and/or interest to that stakeholder group.

The most common themes identified relate to the syllabus, training, entry level and exam process of the stakeholders respective TM CPC programme. The themes were discussed in detail with the respective stakeholder group and are outlined throughout this chapter. The following pages are listed in alphabetical order and bear no emphasis on the strengths or weaknesses of any particular stakeholder group.

European Benchmarking

France

Grant Thornton met with representatives from the French Ministry of Transport on October 4th 2022. Specifically, Grant Thornton met with the Chief of Transport to discuss the TM CPC programme in France. Information on the French TM CPC programme was gathered from extensive desktop research, as well as consulting with the Chief of Transport and is presented below under the identified themes.

Training

Similar to all other countries consulted with by Grant Thornton, France do not require a minimum training standard prior to sitting the TM CPC exam. However, unlike other countries, France identify this to be a significant weakness within their own programme. The Chief of Transport suggested that the success rate of the exam could rely on the amount of training undertaken prior to sitting the exam. According to the Chief of Transport during the consultation process, France have a relatively low TM CPC success rate, with an average success figure given of just below 50%. The Chief of Transport stated that France were planning to undergo a review of their TM CPC programme.

France does not have an official system in place whereby refresher training is mandatory for all TM CPC holders. However, transport managers who have not been active in the industry for five or more years are required to register for 35 hours of refresher training to re-join the profession.

Private training provider companies develop the training content and they provide refresher training to those wishing to apply. When asked if France were considering implementing compulsory refresher training as part of their upcoming review, the Chief of Transport stated they were not in favour of it being a mandatory aspect of the programme. It was felt that the introduction of compulsory refresher training or CPD would provide significant challenges to the smaller companies in France and would make the industry less attractive. The Chief of Transport suggested there should be a minimum standard training requirement however, but that CPD should be an optional element.

Exam Process

Unlike the Irish TM CPC programme, the French TM CPC exam consists of only one paper. Exam candidates are given a total of four hours to complete a set of 50 multiple choice questions (MCQ's) and two case study questions. According to the Chief of Transport, the exam questions bank is updated regularly, at least once per year, in line with frequently changing legislation.

France are the only country consulted with by Grant Thornton who update their learning material internally within the Ministry of Transport.

This was noted during consultation as an activity that can be challenging for the Ministry as the associated workload requires significant commitment. The Chief of Transport recommended that this particular body of work should be outsourced to external Subject Matter Experts (SMEs).

France recently introduced a €30 one-off charge for those who register to sit the TM CPC exam. Prior to this, the TM CPC exam in France was free-of-charge. However, it was noted that without a cost, candidates were registering to sit the exam, but were not always attending the exam. This charge of €30 is also to be examined as part of France's overall review of the TM CPC programme.

Unlike other international stakeholders consulted with, France offer a 'certified by equivalence' method of certification. According to the Chief of Transport, a significant number of TM CPC holders in France did not pass a TM CPC exam, but instead were certified by equivalence. Certification by equivalence is where a candidate may apply to be exempt from sitting the exam if they can prove they have sufficient knowledge and competence of the subjects outlined in Annex I. of EU 1071. This can be achieved through other certificates, diplomas, degrees or necessary work experience deemed acceptable by the relevant state representative in the sector. Even though approximately 5,000 candidates sit the exam each year, the majority of transport managers in France are certified by equivalence. This process is monitored by a database within the Ministry of Transport; however it was noted that managing this has proven to be challenging.

Conclusion

France are due to undergo a review of their own TM CPC programme as the Chief of Transport identified a number of weaknesses and opportunities within their current model. A number of recommendations were outlined to Grant Thornton for consideration by the DOT in Ireland. The Chief of Transport strongly recommended maintaining a mandatory training requirement for the TM CPC exam, as it is believed to be a critical aspect of the programme. It was also recommended to explore the concept of certification by equivalence, providing it can be delivered in alignment with EU 1071.

European Benchmarking

Latvia

Grant Thornton met with representatives from the Licencing Division of the Latvian Road Transport Administration (RTA) on October 12th 2022. The RTA is funded by the Latvian Ministry of Transport, whose main functions are to maintain and develop the national transport system, as well as co-ordinating access to the road transport market.

Information on the Latvian TM CPC programme was gathered from extensive desktop research, as well as consulting with the RTA and is presented below under the identified themes.

Training

The Latvian TM CPC course is taught as part of the high school educational system and all students must sit the TM CPC exam. Those wishing to undertake the course outside of the high school programme are eligible to do so with no minimum training requirement.

The Latvian RTA oversees three private companies who manage and provide professional competence courses. All three companies are given full autonomy by the RTA to create their own training guide in line with EU 1071. In Latvia, no official physical books or manuals are used as part of the training guide. Instead, all learning materials are made by private companies in digital or paper format. According to the Latvian RTA, this is completed to allow for regular updates to the training guide due to frequent EU legislative changes. However, it was noted during consultation that the training in Latvia is considered to be too short and does not include specific training relevant to the modern transport manager.

In terms of refresher training, currently no system in place which requires transport managers to undergo any form of CPD in Latvia. It was suggested as an aspirational recommendation by the RTA that any transport managers who have been inactive for five or more years should undergo a refresher course in order to work within the industry again, this procedure should be enacted as common practice in all other EU countries. The refresher course would be similar to a mandatory course currently in place for transport managers who breach national and/or EU regulations.

Training Providers

The RTA identified a number of strengths in their current TM CPC programme. The majority of the strengths identified are in relation to the training providers. The RTA do not input into the development of the learning material and course content. Instead, this responsibility is with the training providers.

The RTA's perception is that enabling training providers to develop all learning materials results in a competitive market with development of the best course. The 'best course available' would consist of the most up-to-date and relevant material delivered at the most reasonable price. Training providers delivering the 'best course available' provide benefits to students such as competitive pricing and high quality teaching.

A weakness identified by the RTA in relation to the lack of their involvement in developing the course content is that there is a potential for development and teaching of poor quality learning material. It was outlined during the consultation that the majority of the content in the Latvian syllabus is based on EU legislation and that there are no practical elements of the training course which would reflect the day-to-day tasks of the modern transport manager. According to the RTA, it would be more beneficial to students if training providers taught "real world" examples using practical scenarios and solutions, as opposed to legislation-based material. The RTA are not currently involved in the creation of learning material and therefore, do not provide any recommendations on the course content. However, the RTA do provide oversight on the development of the TM CPC exam and they believe that this is the optimum amount of oversight required for an efficient and competitive TM CPC programme in Latvia.

Exam Process

The Latvian TM CPC exam is currently paper-based. The examination is organised and the CPC certificates are issued by the RTA; however, the RTA are working to convert the traditional paper-based exam into a digital version. The benefits of a digital version, according to the RTA, include a quicker and more efficient exam correction process and a more efficient method for updating exam questions in line with frequently changing legislation.

Conclusion

The RTA offered several opportunities which the DOT in Ireland could consider. The RTA suggested the DOT should not provide a "strict" pre-set syllabus to training providers to follow and instead, give providers autonomy to create their own learning material. This would transfer the responsibility of updating the course content to the training providers in order to offer the 'best available course'. Although weaknesses were identified with this process, the RTA believes this method works well in Latvia and should be considered for adoption into the Irish programme.

European Benchmarking

Sweden

Grant Thornton met with representatives from the department of Road and Rail within the Swedish Transport Agency (STA) on September 19th 2022. The STA was established on January 1st 2009 and is responsible for the regulation and supervision in the transport sector in Sweden.

The STA consists of five major departments, one of which, the department of Road and Rail, is responsible for formulating regulations within the field of road and transport, as well as overseeing qualifications such as the TM CPC. Information on the Swedish TM CPC programme was gathered from extensive desktop research, as well as from consultations with the STA and is outlined below under the identified themes.

Training

The STA do not enforce a minimum training requirement prior to sitting the TM CPC exam. Training for the TM CPC programme is delivered by private companies and is handled by the open market. It was garnered during consultation that CPD and refresher training are not provided. However, it was recognised that, as compulsory refresher training is provided to drivers, there should be the same, if not additional, refresher training for transport managers. It was proposed during consultation that the optimum amount of refresher training should be similar to that of drivers in Sweden, which is currently seven hours over a period of five years totalling 35 hours.

When referencing the driver's CPC course, it was noted by the STA that there was a significant lack of engagement. However, the STA advised against the delivery of the TM CPC programme online due to the perceived effectiveness of the online driver's previous CPC programme. According to the STA, the main risk associated with delivering the course online is the potential lack of engagement from students in an online setting. It is believed that the potential lack of engagement could lead to a reduction of knowledge gained from the programme resulting in a rise in the failure rate for the exam.

Exam Process

The Swedish TM CPC exam is currently paper-based, with no current plans to move to online delivery. The Swedish TM CPC exam is compliant with both EU 1071 and the STA's "regulations and general advice about tests in professional knowledge for professional traffic (2021)". The content of the exam is adapted depending on which type of transport the test applies to: road haulage, or passenger transport.

The exam is comprised of the following two tests:

- The first test includes 40 MCQs with each right answer worth one mark.
- The second test includes 20 short questions with each right answer worth two marks.

A minimum of 24 points is required to pass for both tests. Both tests are a closed-book assessment with a time limit of two hours each. In order to pass the overall exam, both tests must be completed within one calendar month of each other. All exam questions are updated annually in line with changing policy and legislation. The STA do not update the exam question bank and learning material internally. The examination and question bank is managed by the Swedish Transport Administration who engage a reference group to determine the overall standard of the exams and to ensure the material is kept up-to-date and in line with EU 1071. The reference group is made up of volunteers, invited from national organisations, who are interested in the profession. Examples of national organisations who have members as part of the reference group include the Swedish Association of Road Transport Companies, the National Association of Traffic Trainers and the Swedish Confederation of Transport Enterprises. It should be noted that all members of the reference group are required to sign a confidentiality agreement upon membership.

Conclusion

When discussing the main strengths of the programme in Sweden, the STA praised the associated reference group. According to the STA, the burden of work associated with the regular update of TM CPC exam questions bank would be too much to efficiently carry out internally. The STA recommended the provision of a reference group to determine the examination questions and to update the exam questions bank. The STA believe that the TM CPC programme should not be managed internally as the workload involved would affect its efficiency.

During consultation the STA also referenced the risk to the success rate of the TM CPC programme if the course were to be solely delivered online. With reference to the Swedish driver's CPC, it was noted that online delivery can often result in a lack of student engagement. Poor student engagement in the TM CPC programme could lead to a reduction in knowledge gained and therefore a reduction in the number of successful exam candidates. Although the training is handled by the open market in Sweden, it is believed that training should largely take place in a physical environment where possible.

European Benchmarking

The Netherlands

Grant Thornton met with representatives from the Centraal Bureau Rijvaardigheidsbewijzen (CBR) on September 20th 2022. The CBR is a national government organisation that assesses the driving skills, both theory and practice, the medical fitness of drivers and the professional competence of professionals in the transport and logistics sector on behalf of the Dutch Minister of Infrastructure and Water. Information on the Dutch TM CPC programme was gathered from extensive desk research, as well as consulting with the CBR and is outline below under the identified themes.

Training

To obtain the Certificate of Professional Competence (CPC) for the transport of goods by road, applicants in the Netherlands must register through the CBR to sit six entrepreneurial exams. There is no minimum standard training requirement prior to sitting the exams; however, there are many private companies who offer a TM CPC training course. Training providers are given the authority to develop and create their own training content. The CBR's cited benefit of this was ensuring the onus was on training providers to keep the course relevant with the most up-to-date material and any changes to legislation. All training providers compete to offer the best course available resulting in varying competitive prices.

The training providers are not currently certified or audited by the State or the CBR; however, there is a desire for this to change in the future. According to the CBR, a lack of oversight on the content provided to students exists, which can result in poor training. It was noted by the CBR that uncertified trainers result in uncertified training which often leads to courses providing very poor or basic information. A number of training providers in the Netherlands only teach the basics to pass the exam. This was an issue identified by the CBR which the CBR recommended to the State.

The CBR are also recommending the introduction of a mandatory training requirement of approximately one day per week for six months. However, they do not believe this will be introduced in the near future as it would mean a change in national legislation which can take a significant amount of time. Finally, the CBR recognises the importance of CPD and stated they would be keen to introduce refresher training in the Netherlands every five years.

Exam Process

The TM CPC programme is unique in the Netherlands as the CBR require students to pass six individual closed-book exams to receive certification.

The programme consists of the following modules accompanied by the cost of each exam:

- Business Administration (€140.95);
- Transport of goods or passengers (part I) and Transport of goods or passengers (part II) (€140.95 each);
- Financial Management (€164.50);
- HR (€140.95); and
- Calculations (€164.50).

According to the CBR, breaking down the programme into six examinable modules results in the content being easier to focus on and understand. Once all six exams are passed, the individual may apply for a Professional Competence certificate which lasts indefinitely.

Entry Level

One of the suggestions from the CBR was to introduce a pre-education entry requirement to register for a TM CPC training course. The training courses can be very challenging and are relatively expensive. To avoid a number of people registering for the course, paying the tuition fees and then being unable to understand the complexities of the programme, it was proposed that an entry requirement should be implemented. The CBR are pursuing the opportunity to introduce two TM CPC courses, one for those who will only operate regionally and another for those wishing to work internationally. There would be significant deviations in the two courses. The content for those who will only work domestically would be significantly reduced and simplified as it would not have to adhere to Annex I. of EU 1071.

Conclusion

The programme has unique differences to the current TM CPC model in Ireland. The major difference is the requirement on students to pass six individual exams to attain their CPC. Each module is designed to reflect the modern transport manager whilst being in line with EU 1071. The training providers control the content for the TM CPC course with no oversight from the CBR or the State. The CBR recommended that training providers should be allowed to create their own content providing there is sufficient oversight by the awarding body and/or the State. It should be noted that this is perceived as aspirational for the Netherlands.

European Benchmarking

The UK

Grant Thornton met with representatives from the Skills and Education Group (S&EG) on September 26th 2022. The S&EG offer qualifications and assessments regulated by the Council of Curriculum, Examinations and Assessments (CCEA), the Office of Qualifications and Examinations Regulation (OFQUAL), Qualifications Wales and other non-regulated provisions. The S&EG develop the content for the TM CPC exams, provide exams and are responsible for correcting all exams.

It should be noted that the UK officially left the EU on January 31st 2020 and therefore, the UK TM CPC is not required to abide by EU 1071. However, the UK does comply with EU-UK Trade and Cooperation Agreement which aligns with EU 1071. Information on the UK's TM CPC programme was gathered from extensive desktop research, as well as consulting with the S&EG and is outlined below under the identified themes.

Training

The TM CPC programme in the UK is offered in three ways:

- classroom based learning;
- online remote learning; and
- a study pack for self learning.

Individuals can sign up for one of the courses through a certified training provider. Training providers are given the authority to develop their own training content based on best practice and previous exam papers. It was suggested that by giving training providers full autonomy on developing learning material, it transfers the responsibility of continuously updating the content from the awarding body to the training providers.

The S&EG are responsible for formulating, providing and correcting the exams. Similar to the Netherlands, the training in the UK is not regulated by the State or the awarding body. Instead, private training companies must provide the most relevant, up-to-date content to dominate the market share.

CPD is not a mandatory requirement in the UK; however, many training providers offer an optional refresher training course. The prices of the training course and the refresher course vary between training providers. The S&EG stated that the training providers are currently requesting the UK Department of Transport and the awarding bodies to endorse the refresher training courses being offered, rather than making them compulsory.

Exam Process

There are four awarding bodies of the TM CPC in the UK:

- S&EG;
- CILT UK;
- Innovative Awarding; and
- City & Guilds.

Although all awarding bodies compete with one another for the market share, the market is not considered to be overly saturated. This circumstance allows for strong links between the awarding bodies and the training providers. As previously mentioned, the awarding bodies are only responsible for formulating, providing and correcting the exams; all other responsibilities lie with either the training providers or the students themselves.

There are two exam papers as part of the overall TM CPC exam in the UK. The first exam is a closed-book MCQ paper and the second is an open-book case study paper. The S&EG hold four exam series per annum with new questions and case studies developed for every exam series. The S&EG outsource external SMEs to develop the most up-to-date questions per exam. The case study is updated regularly by external SMEs and assesses aspects relevant to the modern transport manager. Although this was identified as one the biggest strengths of the exam process in the UK during consultation, the S&EG were also able to identify certain weaknesses.

As the S&EG outsource the development and correction of the exam papers, they are solely confined to the requests and demands of those SMEs. Another challenge identified by the S&EG is ensuring that the exams are conducted correctly as per the guidelines imposed by the S&EG.

All exams are paper-based and are sent to exam-centres approximately one week prior to the date of the exam sitting. Those exams must be stored in a safe location prior to the date of the exam. Random checks are performed by the S&EG to ensure all standards are being maintained. The pass mark for the case study exam paper is set at 30 marks out of 60 and the pass mark for the MCQ exam paper is set at 42 marks out of 60. Achieving both these pass marks results in an overall passing grade of 60% in line with the EU-UK Trade and Cooperation Agreement. However, it should be noted that the pass marks in each exam can vary depending on a competence threshold set by S&EG. After every exam series, a S&EG executive meeting is held to determine an appropriate pass mark for each exam.

European Benchmarking

This pass mark, also known as the competence threshold, is dependent on the relevance of the exam questions and the difficulty faced by exam candidates. It is important to note that the competence threshold only impacts the individual exam paper pass mark and does not impact the overall passing grade of 60% as set out in the EU-UK Trade and Cooperation Agreement.

- ❖ For example: it may be decided that the competence threshold for the case study exam should be set at 32 marks out of 60. This would reduce the competence threshold of the MCQ exam paper to 40 marks out of 60 to maintain an overall pass mark of 60% (72 marks out of 120 marks).

This pass mark is outlined in the chief examiner's report published on the S&EG website following each exam series. The chief examiner report consists of the competence threshold, questions which received the highest marks and questions which received the lowest marks. The report is subsequently made available to all training providers and can be freely downloaded from the S&EG website. The most recent publically available chief examiner report is listed in the acknowledgements of this report. The S&EG stated during consultation that training providers use this report, as well as methods of best practice, to update and develop content for the following exam series. The S&EG believe this is a robust process to ensure equity between all exam candidates and provides transparency between the awarding body and the training providers.

Conclusion

The S&EG felt their largest strength is in the programme assessment. No other country identified by Grant Thornton offered four exam series per year.

When asked about recommendations for the DOT in Ireland, the S&EG offered that it is in the best interest of the students for training providers to produce their own content. The S&EG also recommended implementing a process to determine the competence threshold per exam sitting. It was suggested that by providing an exam feedback report, the training providers can better develop updated content in line with what is expected.



Thematic Review

Thematic Review

Overview

The Department of Transport engaged Grant Thornton for the review of the TM CPC programme. The primary objective for the review was to establish the best course of action for the development of the TM CPC programme in Ireland.

The current programme in Ireland consists of 100 hours mandatory training prior to sitting the TM CPC exam. The content and learning materials for this training are provided by the awarding body, CILT. CILT are responsible for the:

- development and maintenance of the training manual course content;
- development and maintenance of the exam questions bank; and
- correction of all exam papers and certification of successful candidates.

External SMEs are outsourced to assist in correcting the exams, as well as developing the training manual and exam material. The current training manual is made up of nine chapters, eight of which are examinable. Those eight examinable chapters are as follows:

- | |
|--|
| 1. Setting up a Road Transport Business. |
| 2. Access to the Road Transport Market. |
| 3. Transport Operations Management. |
| 4. Financial Management. |
| 5. Technical Standards. |
| 6. Civil, Commercial and Social Legislation. |
| 7. Conventions and Documentation. |
| 8. Route Planning and Road Safety. |

The current training manual was developed in 2018 and due to legislative changes, an addendum to the training manual was introduced in 2022. The addendum replaces various sections in the training manual with topics covering:

- Access to the Market;
- Vehicle Weights & Dimensions; and
- Driving Hours & Tachographs.

Both the training manual and the addendum are supplied to each student to use as reference material for the duration.

The current TM CPC training course, delivered as a commercial activity by the approved training providers, is priced at approximately €1,000 with some variation among the providers. CILT charges candidates a fee of €285 to sit the exam. This fee includes provision of a copy of the training manual and the addendum. Both papers are physically taken in an exam centre and are worth 400 marks each. There is a single paper pass mark of 50% and an overall exam pass mark of 60%. Current Irish legislation does not require any form of mandatory CPD or refresher training for the TM CPC.

Thematic Review Methodology

The approach for this thematic review involved a thorough desktop research process and extensive consultations with a number of key stakeholder groups.

The DOT provided Grant Thornton with a desktop research package consisting of information on the current TM CPC programme, work which had been completed to-date in terms of reviewing the programme, relevant EU legislation and a list of key stakeholder contact information. Grant Thornton reviewed all the documentation provided by the DOT prior to engaging with stakeholder groups.

As previously mentioned, Grant Thornton conducted 18 consultations in total, 13 of which were with key Irish stakeholders. Grant Thornton contacted 30 Irish stakeholders in total, including:

- seven training providers;
- three professional bodies;
- ten passenger transport operators; and
- ten road haulage operators.

Similar to the international stakeholder consultations, a set of questions were developed to reflect a SWOT analysis. This particular set of questions were tailored towards the current state of the Irish TM CPC programme. After thorough analysis of the qualitative data from the consultations, Grant Thornton identified several themes relating to:

- the syllabus;
- training and CPD;
- the exam process;
- a minimum standard entry requirement; and
- other, such as cost and communication channels.

Thematic Review

The information provided in this chapter is based solely on the qualitative findings of the Irish stakeholder consultation process. These are not to be considered as recommendations by Grant Thornton; rather they are suggestions and observations from the 13 Irish stakeholders with whom Grant Thornton consulted.

Thematic Review

Syllabus

The syllabus theme was the single most occurring theme extracted from the stakeholder consultation data analysis. Grant Thornton have broken down this theme into the following two parts:

- Syllabus content; and
- Syllabus delivery.

Syllabus Content

Strengths

Similar strengths were identified by the Irish stakeholders regarding the current syllabus content. Throughout the consultation process the broad nature of the syllabus was cited. In particular, the wide ranging topics appropriate to the operations of a transport business was considered beneficial. The course was also described as “thorough” referring to the eight examinable chapters which were perceived to provide students with the relevant skills and knowledge to work within the industry.

Weaknesses

A significant number of weaknesses were also identified with the syllabus, largely due to outdated material. The analysis reflects a universal acknowledgement of out-of-date information with an urgent call to address the issue.

It was noted in several consultations that frequently changing EU legislation on topics including but not limited to Brexit, Tachographs and Driving Hours are not currently being accounted for in the syllabus. In some instances, it was noted that students were being examined on information that is no longer current due to recent legislative changes. It was shared during consultation that the syllabus information does not reflect the content necessary for the modern transport manager. This was cited as occurring to the significant lack of updates to the syllabus. It was recommended that an urgent update to the course syllabus occurs.

The lack of available previous exam papers was cited as a point of frustration by a number of Irish stakeholders. Providing access to previous exam papers could increase the quality of training and also benefit students studying for the final exams. It was noted that exploring these opportunities could increase the exam pass success rates.

Recommendations

A number of other recommendations were shared during consultations. The introduction of modules additional to what is required by EU 1071, such as human resources and people management were frequently suggested. However, it should be noted that the addition of such modules is out of

scope and is not supported by EU 1071. The majority of the training providers stated that the provision of learning outcomes accompanying each chapter would enhance the learning experience. It was felt that the use of learning outcomes would give the training providers more direction in terms of delivering the necessary training. It could also allow for more directed learning for the students and could potentially increase the pass rate.

Syllabus Delivery

The delivery of the syllabus is separate to the content within the programme. The analysis shows a mixed consensus on the most preferred method of delivering the TM CPC programme.

Observations

During the Covid-19 pandemic, training providers were advised to deliver the TM CPC course remotely in line with public health guidance. Currently, training providers now have the authority to choose whether they deliver the course online or physically in a classroom. The majority of training providers stated during consultation that they would like guidance on the most appropriate method of delivery, whether it be online or in-class. It was felt by many that, due to the commitment of 100 hours, delivering the course online provides students with the flexibility required to attend. Permitting the course to be flexible and easily accessible has the potential to increase the overall student participant numbers. Although it was recognised that online delivery may reduce class engagement, it is understood to be important to offer the course remotely to facilitate all students.

The format of the learning material was another topic of interest for all stakeholders consulted with. The learning material is currently delivered in the form of a physical training manual; however, there were many calls from key stakeholders to convert the physical training manual into a digital version. Although it was noted that a number of training providers may struggle at first with a digitised syllabus, it is deemed a more efficient method in terms of regularly updating material. It was generally felt that the training manual should be provided in the form of both a physical book and an e-book to suit all cohorts.

All stakeholders were cautious of impactful changes and acknowledged that any changes should be introduced on an incremental basis where possible. An incremental approach was also perceived as a more effective method to reduce resistance from key stakeholder groups.

Thematic Review

Training and Continuous Professional Development

Another theme extracted from the consultation analysis and desktop research process was training. Grant Thornton have separated this theme into two distinct sub-themes of:

- Training; and
- Continuous Professional Development.

Training

Strengths

The appropriateness of the mandatory 100 hours for training was a very frequently cited topic in this area. It is largely believed that the minimum standard training requirement is sufficient for the course. However, it was recognised that due to lack of audited training, the level of competencies developed within the training courses are largely dependent on the skills of the training provider.

Recommendations

It was suggested during the consultation process that training providers should be given the responsibility of developing their own syllabus content. This change was proposed as stakeholders feel it would result in healthy competition to attain the biggest market share. The introduction of a competitive market may result in the elimination of poor quality training providers. This division in quality could allow students to choose the best training provider based on competitive pricing and feedback reviews.

Another advantage identified during consultations was that the responsibility of frequently updating the learning material transfers from the awarding body to the training providers. This would be expected to help ensure that content is regularly updated as training providers would be competing with each other to offer the best available course.

The training providers whom Grant Thornton consulted with stated that this process could only work if there were strong links established between the training providers and the awarding body. Without these links being established and embedded, there is a risk that training providers might deliver a course which does not comply with EU 1071 and/or risks providing irrelevant content to students.

Continuous Professional Development

Observations

The second sub-theme extracted from the consultation data analysis was CPD and, more specifically, the reoccurring views on introducing some form of refresher training. It was clear that the majority of stakeholders were in favour of the introduction of CPD; however, there were differing views on what format this should take.

Recommendations

During the consultation process, the transport operators largely believed that CPD would be useful if it was optional and not mandatory, whereas the training providers largely believed that CPD should be compulsory.

There were mixed opinions on the frequency of CPD, i.e. if it should be recommended every three years or every five years. Both the training providers and transport operators were in agreement during consultation that CPD should be used as a means of providing legislative updates to those active in the industry. It was suggested that this could be achieved in one of two ways:

- a web-based programme which would quiz the candidate at the end of the session; or
- a group based session which requires mandatory attendance instead of formal assessment.

A limited number of stakeholders believed that it is appropriate to formally assess active transport managers on the CPD material. However the few stakeholders that did believe in formal assessment referenced a "Use it or Lose it" mentality during the consultation process. These stakeholders explained that transport managers who have not been active in the industry for a minimum of three years should be formally assessed every certain number of years to maintain their certification. It was suggested that this process could help to reduce the number of incompetent transport managers actively working in the industry.

It was also suggested during consultations that transport managers who have been actively working in the industry for more than ten years should be exempt from mandatory refresher training. This would be expected to help reduce the level of resistance from more experienced TM CPC holders.

Thematic Review

Exam Process

This theme details what stakeholders believed, during the consultation process, to be the most efficient way of assessing exam candidates.

Strengths

Stakeholders shared that the use of MCQ's in both exam papers is appropriate and should be maintained. It was also agreed among stakeholder groups that the structure of having a paper one and a paper two is less daunting than one overall paper and, similarly, better than multiple exams for the students.

Weaknesses

There were a significant number of weaknesses identified with the current exam process. It was observed in multiple consultations that the weighting of the questions is felt to be uneven and unfair. This is in reference to the case study question on both papers which is worth a total of 150 of the 400 marks available. The case study question, which was previously 100 marks, focuses on the application of knowledge regarding costings and is worth 37.5% of the exam. Training providers explained that if a student had poor knowledge on the area being assessed in the case study then the chances of that student passing the overall exam decrease significantly.

In terms of the content within the exams, it was stated that the language used could be improved. It was observed that typos are frequent and that many questions are poorly written. Many stakeholders, especially the transport operators, shared how difficult the exam was with some training providers believing that the difficulty of the exam impacts the number of students registering for the course.

It was mentioned that the exam series take place at times during the year which, it was felt, may be difficult for certain people to commit to. According to a number of training providers, the exams were previously set after summer and after Christmas. Now, the exams take place at the start of summer and just before Christmas. These were noted as busy times for transport operators and for many, it is not a suitable time to take off work for the TM CPC course.

The final key criticism noted from the consultations was in regard to the time taken to correct the exams. It was expressed that there are significant delays of more than eight weeks until exam results are issued to students.

Recommendations

A set of suggested improvements were provided from the key stakeholders during consultations. The introduction of a form of continuous assessment (CA) which would contribute to the students' final grade was proposed as an aspirational recommendation. The use of CA would reduce the weightings of questions in the final exam and therefore reduce the level of overall exam difficulty. This suggestion was proposed on the basis of an ideal scenario, however it is acknowledged that EU 1071 does not support this.

Additionally, scheduling the exams to a more suitable window during the calendar year may increase the level of uptake of the TM CPC programme.

Finally, stakeholders suggested that the introduction of feedback reports for each exam series could be beneficial. If introduced, this report should include exam corrections and sample answers. Training providers would be able to use these feedback reports to influence how best to deliver the TM CPC course.

Thematic Review

Minimum Standard Entry Requirement

Observations

The majority of training providers agreed during the consultation process that the introduction of some form of minimum entry requirement prior to registration could be of benefit. It was acknowledged that training providers believe the content of the course and exam can be very challenging. Further to this, it was also explained that the content is considered to be too basic for more advanced learners. With a class of mixed abilities, delivering the course at an engaging pace can be challenging for the training providers.

It is worth also noting that it was expressed that the introduction of a minimum entry requirement would be expected to significantly reduce the number of students partaking in the course. A reduction in student numbers could potentially lead to a reduction in the number of certificates issued each year and a reduction in transport managers could be damaging to the industry.

Recommendations

Several suggestions were offered during the consultation process to help address concerns raised such as the following.

A recommendation was offered to split the course into two levels, one for beginners and the other for more advanced students. The course for beginners would include introductory content covering the knowledge required to run a national road transport business. The course for advanced students would provide the level of knowledge required for road transport operators to operate internationally.

Another recommendation given was to introduce a pre-training course prior to the 100 hours training. The pre-training course would be for those who do not have relevant experience or education in the field. The pre-training would be designed by the training providers and would give a brief introduction to each chapter. The purpose of this would be to help ensure all candidates begin the course at a similar level.

A final recommendation was offered during consultation which included introducing a minimum education requirement in order to register for the TM CPC programme. As the current course is recognised as an National Framework of Qualifications (NFQ) Level 4 qualification, applicants for the course should be required to have previously attained an NFQ Level 4, such as the Leaving Certificate. Introducing an entry requirement such as this may result in students with similar levels of abilities registering for the course.

The majority of training providers believed that introducing some form of entry requirement is necessary going forward.

Thematic Review

Other Themes

There are two remaining themes which were identified as part of the consultation analysis. Those themes are:

- Cost; and
- Communication channels.

Cost

Observations

Cost was a theme identified as an influential factor by key stakeholders during the consultation process. There were two main points identified in relation to cost which should be considered if redeveloping the TM CPC programme in Ireland.

The training providers, during consultation, were of the opinion that any increases in prices associated with TM CPC programme, either the cost of fees or the tuition costs, may reduce the number of participants each year. It was suggested that increases in costs could result in the programme being inaccessible to many and a dip in the annual number of students receiving the TM CPC could potentially damage the transport industry. Training providers offer the TM CPC course as a commercial activity and the cost of the course is determined by the market.

It was also highlighted that any changes to the current Statutory Instrument No. 460 of 2015 Road Transport Operator Licensing (Fees) Regulations would require legislative change. Any increase in fees would involve an amendment to that Statutory Instrument and would require the approval of the Minister for Public Expenditure and Reform and the Minister for Transport.

Communication Channels

Observations

The need for stronger communication links was quoted on multiple occasions during the consultations to facilitate the efficient delivery of the TM CPC programme. This theme specifically focuses on establishing a better connection between the awarding body and the training providers. It was stated during consultations that recently, sub-optimal communication has arisen between training providers and the awarding body. It was suggested by some stakeholders that there was a feeling of detachment between both parties.

Many training providers expressed a desire for improved communication on EU legislative changes from either the DOT or the awarding body. During the consultation process, the lack of communication regarding updates was cited as a point of frustration for many training providers and a contributing factor to conflict.

Conclusion

The observations of the key Irish stakeholders identify the strengths and weaknesses with the current TM CPC programme. Grant Thornton have considered these observations and recommendations to help formulate six specific models.



Models: Analysis and Appraisal

Models: Analysis and Appraisal

Background

Grant Thornton have reviewed the current TM CPC programme using desktop research, a rigorous stakeholder consultation process and European benchmarking.

Following this review, Grant Thornton have identified five possible models in relation to a review of the TM CPC programme. The models are described in a thematic style using appropriate headings which have been identified by Grant Thornton as a result of the primary and secondary research. The headings used to describe each of the five models are:

- Syllabus;
- Oversight;
- Training;
- Exam Administration;
- Entry Requirement;
- Continuous/Optional Professional Development; and
- Cost.

This chapter provides an overview of each of the five models identified. Following each model descriptor, a model appraisal is included based on pre-determined criteria. These criteria focus on three main areas:

- Feasibility;
- Acceptability; and
- Suitability.

Grant Thornton have defined the feasibility in terms of cost effectiveness and ease of implementation. Acceptability refers to the perceived level of non-resistance from each key stakeholder group. The key stakeholder groups referred to in relation to acceptability are:

- The DOT;
- The awarding body;
- The students; and
- The training providers.

Finally, suitability focuses on compliance with relevant national and EU legislation, such as EU 1071. Suitability also refers to capacity to support future-proofing.

Analysis of each model, using these criteria, highlights the associated strengths and weaknesses whilst showcasing the appropriateness of each model.

Overview of the Models

As mentioned, all five identified models within this report are based on findings from desktop research, the stakeholder consultation process and European benchmarking. The first model overleaf describes the current TM CPC programme and serves as a benchmark for the remaining models. The remaining models are assessed against model one.

Following all five models, a comparison table is shown outlining the specific criteria which are or are not included within each model.

A suggested model, or sixth model, is offered in the chapter entitled “Our Suggestion” where Grant Thornton have identified and selected the strongest elements from each of the five preceding models. This suggested model has been assessed using the same criteria of feasibility, acceptability and suitability which is followed by a table highlighting the main aspects of the model.

Models: Analysis and Appraisal

Model One Descriptor

The first model identified by Grant Thornton involves implementing no change to the current TM CPC programme. The current state would remain the same and therefore the model serves as a benchmark or frame of reference against which other models can be assessed. The description of the current state is outlined below.

Syllabus

The syllabus of the TM CPC programme is the responsibility of the awarding body, CILT. The syllabus consists of learning material within a training manual (2018) developed by CILT accompanied by an addendum document (2022). The training manual is comprised of nine chapters, eight of which are examinable. The eight examinable chapters within the syllabus are as follows:

1. Setting up a Road Transport Business.
2. Access to the Road Transport Market.
3. Transport Operations Management.
4. Financial Management.
5. Technical Standards.
6. Civil, Commercial and Social Legislation.
7. Conventions and Documentation.
8. Route Planning and Road Safety.

The information set out in the training manual assesses professional competence in compliance with the subjects listed in Annex I. of EU 1071.

Oversight

The oversight of the programme is the responsibility of CILT as the awarding body. CILT are responsible for the development and maintenance of the syllabus and for the exam questions bank. The training courses are currently not audited, however all training providers must be certified and approved by the DOT. Prospective training providers must meet a set of established criteria and apply through CILT for certification following an application fee of €225.

Training

The delivery of the training course, whether delivered in a classroom setting or taught online, is at the discretion of the training providers. The training providers deliver the course using a physical copy of the training manual, as well as the addendum. There is no current provision for the use of Portable Document Format (PDF) or e-learning material. All registered students receive a copy of the training manual (2018) and the accompanying addendum (2022) for reference throughout the course.

All TM CPC exam candidates must complete a training course of at least 100 hours before registering for the exam. The training manual for the course is prepared by CILT and is formally approved by the DOT. The training course must be delivered by one of the approved TM CPC training providers. Prospective training providers apply through CILT who then assess the application in line with the pre-defined established criteria and recommend either approval or refusal to the DOT.

Exam Administration

CILT, the awarding body, are responsible for administering the TM CPC exams on behalf of the DOT. TM CPC exam candidates are assessed by two terminal exams. Each exam is delivered in an 'open-book' format and are worth a total of 400 marks. They require a pass rate of 60%. Both exam papers include MCQ's worth either 5 or 10 marks, short questions worth 20 marks, a case study question weighted at 150 marks and two longer questions worth 50 marks each.

The TM CPC exams are held twice a year. There are separate exam papers for road haulage and passenger transport operators. The exams take place physically in an approved exam centre and are invigilated for the duration of the exams. CILT are responsible for developing, overseeing and correcting all exams, as well as issuing the certificate.

Entry Requirement

There is no minimum standard entry requirement for the TM CPC programme. EU 1071 states the minimum level at which the training should be delivered "may not be below level 3 of the training-level structure laid down in the Annex to Council Decision 85/368/EEC", which is otherwise equivalent to the NFQ Level 4.

Continuous Professional Development

There are currently no requirements by the DOT for any form of CPD or refresher training for holders of the TM CPC. Additionally, the TM CPC does not have an expiration date.

Cost

The cost to register with CILT for the TM CPC exam is €285. In addition, prior to taking the exam, mandatory training of 100 hours must be completed with one of the approved training providers, who offer the training on a commercial basis. The average cost of the entire TM CPC programme per student is approximately €1,500 with some variation in the fee charged by training providers.

Models: Analysis and Appraisal

Model One Appraisal

Feasibility

In terms of cost effectiveness and ease of implementation, model one initially appears strong. Model one is based on implementing no change to the current TM CPC programme.

Implementing no change involves no cost increases and no barriers in terms of its ease of implementation. Model one would have no initial one-off cost to the DOT and the recurring costs would remain the same. In terms of the model's implementation, there would be no legislative, policy, resource or process change required. As every aspect of the programme remains the same, the feasibility of the “do nothing” model is attractive.

However, it is recognised that there is a need for change so this model is not suitable and serves as a benchmark for other models.

Acceptability

The acceptability of model one is based on buy-in from key relevant stakeholders. If the decision is made not to implement any changes to the current TM CPC programme, then syllabus would continue to comprise of a training manual, last updated in 2018, and a supplementary addendum document to replace the outdated content.

From the analysis, it is recognised that there is a need for change and no cohort of stakeholders would agree that model one is an appropriate long term model. The consultation process undertaken as part of this review showed all stakeholders believed that the TM CPC programme requires change. It is understood that there would be significant resistance from all four key stakeholders identified if no change was made.

Suitability

Model one is compliant with EU 1071. The current TM CPC programme was developed based on the subjects listed in Annex I. of EU 1071. Therefore the option of implementing no change is suitable in terms of its compliance with national and EU legislation. However, due to the outdated material in the training manual and the need for an additional addendum document, it is evident that model one has very little capacity to support strong future-proofing.

Conclusion

It should be noted, that model one is included for the purpose of benchmarking against other models. Although implementing no change to the current TM CPC programme is feasible in terms of its cost effectiveness and ease of implementation, it is neither acceptable to stakeholders nor suitable. It is understood that model one would experience significant resistance from all key stakeholders.

The current programme does not support future-proofing and requires immediate amendments according to the consultation and desk research process undertaken by Grant Thornton. Overall, model one is not believed to be the optimum option and it should only serve as a benchmark for other models within this report.

Models: Analysis and Appraisal

Model Two Descriptor

This second model is based on the consultation with CILT and desk research. Grant Thornton met with several executive members of the current TM CPC awarding body, CILT, to discuss a proposed direction for the TM CPC programme. The model is outlined below.

Syllabus

CILT have developed a competence framework based on the skills and knowledge required to carry out the duties of a professional transport manager. The competency framework is built on the eight examinable subjects listed in Part I. of Annex I. of EU 1071. Based on the competency framework, the current training manual is suggested as not being fit-for-purpose and that a new training manual should be produced. The proposed new training manual would be reflective of the competency framework and would outline the required competencies, skills and knowledge required of a professional transport manager. The eight subjects, grounded in the competency framework, would be codified into four student blocks. The four blocks, which would include various modules, are as follows:

- Managing Business Operations.
- Managing Drivers.
- Managing Compliance and Risk.
- Managing Transport Operations.

The training manual would be developed by a third-party training content provider and could be delivered in either or both a physical and digital format. The third-party training content provider may provide supplementary training material which could be purchased in addition to the training manual. The training manual is not included within the examination fee and would be at an additional cost. The content, developed by the third-party training content provider, would require input from CILT's SME panel to ensure the learning material is suitable and appropriate.

Oversight

CILT, as the awarding body, would have full oversight of the learning material despite it being developed by a third-party training content provider. CILT would be responsible for all quality control measures relating to the learning material and also the development and provision of examinations. The standard of training would be audited by SME's, resourced by CILT, ensuring the appropriate content is being taught.

This auditing process would be completed with the use of 'on-site visits', similar to what is currently in place within the Agreement Concerning the International Carriage of Dangerous Goods by Road (ADR) programme. All training providers would also be subject to a certification/renewal process which would take place every 12 months. Prospective training providers would apply for certification/renewal through CILT who would subsequently assess the application and recommend either approval or refusal to the DOT. All training providers should be listed on a database which would be managed by CILT.

CILT would provide 'on-site visits' audits throughout the year to assess the appropriateness of the learning material being taught. This auditing process would require the engagement of members from an SME panel. The SME panel would also provide relevant content to the third-party training provider ensuring the material is suitable and appropriate for students. Following this, content within the training manual would be reviewed by the SME panel on an ongoing basis with oversight of any necessary updates.

CILT's current SME panel comprises of four members, two representing passenger transport and two representing freight transport. CILT would ensure ongoing appropriate care when recruiting members of the SME panel. CILT would regularly review the appropriateness of all associated third-parties/externally resourced SMEs.

Training

The standard of training would be maintained at 100 hours and would be delivered by certified training providers. The delivery of the course, whether delivered in a classroom or taught online, would be at the discretion of the training providers. The development of training materials would be externally resourced by a third-party training content provider. The third-party training content provider should be a market leader in the supply of training material with sufficient experience in CPC training.

The training materials would consist of an up-to-date training manual as well as a supplementary training pack. The training pack would comprise of, but is not limited to, the following elements:

- A master set of student notes to be updated regularly;
- A guide for training providers with essential prompts and instructions, relevant examples, questions and answers; and
- Visual aids specifically created to enliven the information provided.

Models: Analysis and Appraisal

To produce suitable training materials, the third-party training content provider would require the engagement of the SME panel to provide content suitable to the TM CPC programme on a yearly basis. This would include ongoing annual recurring costs which would require funding from the DOT.

The supplementary training pack could be purchased as an additional cost by training providers to assist with delivering the course. Alternatively, training providers would be permitted to develop their own training content based on the training manual. The supplementary training pack could also be purchased by students in addition to the cost of the course.

Exam Administration

Exam questions would be based on the four student blocks previously outlined under 'Syllabus', incorporating the competencies listed in EU 1071. The exam would be comprised of two papers with each paper being worth 400 marks, giving a total of 800 marks.

The exam papers would be configured with half of the available marks in a MCQ format and short questions. The other half of the available marks would be a multi-disciplinary case study. A closed-book exam assessing the candidates knowledge should be complemented with an open-book exam. The first exam comprising of MCQ's and short question would be a closed-book exam to assess the retention of safety-critical items. The exam comprising of the case study question would allow an open-book format to assess the application of relevant material. The overall passing grade would be maintained at 60% with a minimum single paper pass rate of 50% expected.

The TM CPC exams would be held twice a year. There would be separate exam papers for road haulage and for passenger transport operators. The exams would take place physically in an approved exam centre which would be invigilated throughout. CILT are responsible for developing, overseeing, invigilating and correcting all exams, as well as issuing the certificate.

Entry Requirement

There would be no minimum standard entry requirement for the TM CPC programme. EU 1071 states the minimum level at which the training should be delivered "may not be below level 3 of the training-level structure laid down in the Annex to Council Decision 85/368/EEC", which is otherwise equivalent to the NFQ Level 4.

Continuous Professional Development

CILT aspire to introduce a three-year mandatory CPD/re-certification programme. In order to implement such a programme, CILT have stated that they would engage in a consultation process with key stakeholders to fully understand the extent of the changes required. CILT aim to begin this consultation process as soon as is feasible to ensure that steps could be taken within the next two to five years in order to make all necessary changes.

Cost

The forecasting for this project is split into two one-off concurrent costs, both of which would require 100% funding from the DOT.

- The first is the estimated initial one-off capital funding to bring the syllabus up to the required standard. This funding includes the cost for the third-party training content provider, project management by CILT, SME support and contingency costs.
- The second one-off cost is for the development of the exam questions and delivery of the supporting material. This funding includes the development of new exam questions, training provider materials and contingency costs.

In terms of annual recurring costs, CILT have developed a funding model for the TM CPC programme. The projected income forecast includes two price increases. There would be an increase in the cost of student exam fees and a second price increase for training providers to gain certification for 12 months. Training providers would be required to pay a higher cost for certification in lieu of the current cost of €225, as set out in Statutory Instrument No. 460. It should be noted, any increase in fees would involve an amendment to Statutory Instrument No. 460 of 2015 Road Transport Operator Licensing (Fees) Regulations and would require the approval of the Minister for Public Expenditure and Reform and the Minister for Transport.

CILT project to run a marginal funding surplus based on their model. However, it should be noted that if less than 150 students register for an exam, the minimum number of students required for an exam series, then it would need to be cancelled or postponed. Alternatively, CILT would need financial support to increase the income in line with the minimum number of students required for that sitting.

Models: Analysis and Appraisal

Model Two Appraisal

Feasibility

Model two includes various amendments to the current TM CPC programme such as the development of a new training manual, the use of a third-party training content provider and the introduction of CPD. All three of these changes would require both an initial one-off cost as well as recurring annual costs.

Model two highlights the need for a third-party training content provider to develop an updated training manual and a training pack comprising of various notes, instructions, visual aids, etc. The implementation of a third-party training content provider would require 100% funding by the DOT and would include a tendering process. Both the initial cost involved and the tendering process affects the model's cost effectiveness and ease of implementation. CILT expressed that any necessary public procurement procedures would be undertaken as needed. It is also possible that the introduction of CPD may incur specific annual recurring costs which would require DOT funding. This would further affect the cost effectiveness of the model. Additionally, in relation to costings, any increase in fees would involve an amendment to Statutory Instrument No. 460 of 2015 Road Transport Operator Licensing (Fees) Regulations and would require the approval of the Minister for Public Expenditure and Reform and the Minister for Transport.

Comparing the feasibility of this model to the benchmarking model, there is a significant reduction in feasibility in terms of both cost effectiveness and ease of implementation.

Acceptability

The current awarding body, CILT, developed the competency framework which would act as the basis for the new training manual, developed by a third-party training content provider. It is understood from stakeholder consultations that amendments to the training manual, course delivery and the introduction of CPD would contribute to a more efficient TM CPC programme for both students and training providers. It is believed that there would be a strong level of buy-in from all stakeholder groups regarding this model. However, the introduction of a compulsory CPD course may result in a significant level of resistance especially from certified and experienced transport managers. It was stated during consultation with stakeholders that a compulsory CPD course could reduce the attractiveness of the profession. This was also noted during consultation with France who stated they were not in favour of CPD as a compulsory aspect.

Although this model offers an improvement in terms of acceptability when compared with model one, there may be a level of resistance from training providers.

Suitability

The updated training manual would be built on the eight examinable subjects listed in Part I. of Annex I. of EU 1071. This model is compliant with both national and EU legislation, making it a suitable model for consideration.

This model also has capacity to support future-proofing through the commitment by CILT to regularly update the training manual at least once a year. CILT would also oversee an SME panel to continuously review the third-party training content provider, ensuring that any training materials, student notes and PowerPoint slide-decks are regularly updated to align with the syllabus. This model is deemed suitable in terms of its compliance with legislation and its ability to support future-proofing.

Conclusion

Unlike model one, model two includes various amendments to the current TM CPC programme especially in terms of the training manual, the method of training and the introduction of CPD. Although model two appears to be more acceptable and suitable than model one, the feasibility of the model could be a significant drawback. There are high one-off initial costs which would require 100% funding from the DOT. These costs are split into two concurrent phases and include costs associated with CILT's project management, SME support and funding for a third-party training content provider. Depending on how the third-party training content provider would be funded, there may be a public procurement process involved as part of this model. It is CILT's expectation that the DOT would fund CILT in the resourcing of a third-party content provider.

There is a significant dependency within this model on the SME panel and third-party organisations. There is also a likely requirement to run a public procurement process. Recognised value exists in the proposed model, however third-party dependencies can create risks that would need to be managed. A further delay may arise due to the changes required to the Statutory Instruments book. Numerous merits are identified with model two which should be considered by the DOT. It is noted that there are acceptability and feasibility implications relating to CPD implementation which suggests that this is not an appropriate model to consider in its entirety but this should not discredit other aspects of the model.

Models: Analysis and Appraisal

Model Three Descriptor

The third model identified is based on the model in the UK. Grant Thornton met with representatives from the Skills & Education Group, one of the awarding bodies for the TM CPC programme in the UK. Grant Thornton identified several strengths with the UK TM CPC programme and believe the model warrants recognition as a model for the DOT to consider. The model is outlined below.

Syllabus

The TM CPC qualification would assess the levels of knowledge and practical aptitude necessary for the management of a transport undertaking as set out in Annex I. of EU 1071. There would be no universal TM CPC syllabus however, the development and maintenance of relevant training content would be the responsibility of the training providers. The training providers could develop the course in three different formats:

- Classroom based learning;
- Online remote learning; and
- A study pack for self-learning.

The student may pick which format of delivery they wish to undertake prior to registration.

There would be no universal training manual; instead learning material, developed by the training providers, would be offered in PDF or PowerPoint slide-deck format.

Additionally, past exam papers and sample answers could be uploaded by the awarding body to their website and be made freely available to download. Past exam papers and sample answers could be used by training providers as part of the learning materials for students.

Oversight

Training providers would be responsible for the maintenance of the learning materials, ensuring that the content is reviewed and updated after every exam series. The awarding body are responsible for formulating, providing and correcting the exams.

Neither the awarding body nor the DOT would audit the training course however, all training providers should be certified and approved by the DOT. Prospective training providers would apply through the DOT who would assess the application. All training providers should be listed on a database maintained by the awarding body.

Training

There would be no standard minimum training requirement to sit a TM CPC exam. Training courses would average at eight to ten days in duration over a period of two weeks (this is subject to change per training provider). The course would last approximately 64-80 hours.

Training providers would be responsible for the development of the content of the TM CPC, which could result in varying quality standards. Training providers would develop the content of the course based on previous exam papers of the latest exam series. The Chief Examiner of the awarding body would also provide an exam report based on the previous exam series which would be used by providers to develop the most up-to-date content. Course prices would also vary as training providers would compete with each other to offer the best available course at the best available price. This would help ensure costs are maintained at a low level for students while maintaining a high standard of quality for the course.

Exam Administration

The awarding body are responsible for formulating, providing and correcting the exams. Due to the workload involved in doing this efficiently, external SME's would be outsourced to develop the exam content and to correct the exam papers. There would be four exam sittings per year with new questions and case studies developed for every exam series. The exam would consist of two papers, one would be a multiple-choice assessment and the other would be a case study question focusing on applying the knowledge and skills required to work in the industry as a transport manager. Each exam paper would be worth a total of 60 marks and would have a duration of two hours.

The pass mark for each exam would be determined by an executive meeting, known as an awarding meeting, held by senior members of the awarding body. After each exam series, the awarding body would review and compare all exam results to determine a fair pass mark, otherwise known as the competence threshold. The competence threshold may differ per exam series in each paper based on the relevance and/or difficulty of that exam. However, it should be noted that an overall passing grade of 60% is still required for certification in line with the the EU-UK Trade and Cooperation Agreement. Following this process, the Chief Examiner of the awarding body would publish a report on that exam series.

Models: Analysis and Appraisal

The exam report would consist of the competence threshold, sample answers, the pass rate for each question and comments on each question indicating where students gained and lost marks. Training providers would use this report to develop and update content for the next exam series. An example of this report is referenced in the appendix under 'UK Chief Examiner Road Haulage Report 2022'.

Entry Requirement

There would be no minimum standard entry requirement for the TM CPC programme. Learners could register for the TM CPC exam from the age of 16. However, the Department for Transport have the right to not recognise someone under the age of 18 as an appropriate transport manager for their operation.

Optional Professional Development

There would be no mandatory form of CPD or re-certification, however training providers would be permitted and encouraged to offer a refresher training course as an optional extra for anyone who wishes to learn the most up-to-date information regarding TM CPC.

Refresher training would be endorsed by the awarding body for the benefit of the students and the training providers.

Cost

There would be various costs to this model. The costs outlined below are indicative and are based on the information provided during consultations with the UK market. In terms of income for the awarding body, each training provider would be charged approximately €700 to be certified and they would be approved for a period of 12 months.

The cost of the TM CPC exam would be approximately €150 per student. Approximately, a re-sit for the MCQ exam would be €60 and a re-sit for the case study exam would be €85.

Prices for both the training course and refresher training course would vary per provider. The prices below are based on prices in the UK and are converted into Euro estimates using conversion rates as of November 4th 2022.

- The average price for a full course, including the final exam would be approximately €1,700 + VAT.
- The online version price would be reduced to approximately €1,150 + VAT.
- The cost for the self-learning study pack would be significantly reduced again to €200, excluding the price of the exam.
- Finally, the cost of the refresher course would be approximately €700.

All prices for the TM CPC course may differ at the discretion of each individual training provider. Any increase in fees would involve an amendment to Statutory Instrument No. 460 of 2015 Road Transport Operator Licensing (Fees) Regulations and would require the approval of the Minister for Public Expenditure and Reform and the Minister for Transport.

Models: Analysis and Appraisal

Model Three Appraisal

Feasibility

Model three involves the responsibility of developing the training content transferring from the awarding body to the training providers. The requirement for training providers to develop their own content should result in a significant reduction in costs when compared with model two.

Model three also requires a change process in terms of the administration of the exam. The awarding body's sole responsibility would be the formulation, provision and correction of the exams unlike in model one where the awarding body are also responsible for the creation and development of the training manual. The model outlines the requirement to produce an exam report for that exam series following an executive meeting of the awarding body. From the consultation analysis with the UK stakeholders, training providers would use this exam report to help develop training content on a continual basis.

This process whereby training providers develop their own content relies largely on the awarding body producing an exam report after every exam series. This element of the model increases the workload for the awarding body and may require additional SMEs. This could be considered a drawback in terms of the models implementation and cost-effectiveness, but is considered feasible within this review.

Acceptability

During stakeholder consultation, it was felt that the training providers may feel this model is more favorable than the previous two models in this report. Training providers would be granted more autonomy and freedom to develop their own training courses and to create their own content.

It is anticipated that training providers would compete with one another to attain the largest share of the market by aiming to offer the best available course at the best available price. This model may provide more opportunities to the training providers and therefore increase the acceptability of the model. As training providers would be competing with one another, students would also be expected to benefit from this model.

Additionally, the removal of the minimum standard training requirement may result in a reduction in time, energy and cost for the student. However, based on the consultation process with international stakeholders, a TM CPC programme with no minimum standard training requirement can lead to an insufficient amount of, and poorer quality, training.

For this reason, it is expected that the acceptability by the DOT and the awarding body would be significantly less than the acceptability of model two.

Suitability

Although the UK left the EU on January 31st 2020, their TM CPC model is currently aligned and compliant with EU 1071. The UK TM CPC exam assesses professional competence based on the subjects listed in Annex I of EU 1071, to which the relevant section of the EU-UK Trade and Cooperation Agreement is aligned.

The system whereby the awarding body produces an exam report which is then used by the training providers to create and update training content was identified as a major strength by the UK stakeholders. Training providers use this report to anticipate the upcoming questions for the next exam series. This report, combined with the subjects outlined in EU 1071, is used to assist in the development and maintenance of the learning material. It was offered that the system operates well in the UK with provisions to update the training content four times a year after each exam series. For this reason, it is understood that model three has capacity to support future-proofing in Ireland and therefore is deemed as a suitable model.

Conclusion

Model three is the first model outlined which requires training providers to develop their own training content. The implementation of a change of this nature could increase the model's feasibility in terms of its cost-effectiveness and ease of implementation. Within this model, there is no necessary requirement to outsource a third-party training content provider, instead, the development of content would be the responsibility of the training providers. This should avoid incremental costs associated with training content development.

The feasibility of this model is reduced by the training providers' dependency on an exam report produced by the awarding body after every exam series. The exam questions as well as the success and failure rate of each individual question, detailed in the post-exam report, influences the training providers to amend the course based on the feedback from that particular exam series.

Models: Analysis and Appraisal

The development process of content by training providers appears to be heavily reliant on the post-exam series exam report. The development of such an exam report would also require additional resources on a continuous basis and therefore reduces the model's ease of implementation.

The buy-in from stakeholders, such as the training providers and students would be high and it is expected that there may be resistance from the awarding body. The awarding body's workload would increase due to the production of an exam report which may require additional outsourced SMEs. The lack of a minimum standard training requirement is another key factor influencing this model.

While model three has many merits, there are identified limitations in terms of its implementation and acceptability. The acceptability is not believed to be consistent across all stakeholders. Drawbacks in terms of the model's reliance on the production of an exam report is also a recognised limitation. Therefore model three is not considered the recommended model.

Models: Analysis and Appraisal

Model Four Descriptor

The fourth model is based on a mixture of observations and recommendations provided by key Irish stakeholders during the consultation process. Grant Thornton met with a representative sample of Irish stakeholders to determine their opinions on the appropriate direction of the TM CPC programme in Ireland. The Irish stakeholders consulted with included training providers, industry representative bodies, road haulage operators and passenger transport operators. The following model is based on an amalgamated view by necessity and may not represent each individual view shared during the consultations.

Syllabus

The content of the TM CPC course should encompass an array of topics assessing the levels of knowledge as set out in Annex I. of EU 1071. The course should provide the necessary skills for the management of a road transport operation beyond those set out in Annex I. of EU 1071 through the inclusion of additional modules covering human resource management and people management skills. It is expected that the addition of these extra modules would produce a transport manager fit for the modern-day industry.

The delivery of the training course, whether in a classroom or taught online, would be at the discretion of the training providers. Training providers would develop their own training materials and continue to set their own prices accordingly.

Oversight

The oversight of the programme would be the responsibility of the awarding body. The courses delivered by the training providers would not be audited, however a large amount of trust would be placed on the training providers to develop appropriate and suitable material. Although no ongoing auditing process would occur, all training providers would be certified and approved by the DOT upon recommendation from the awarding body.

Training providers would apply through the awarding body to attain their certification which would expire after 12 months, at which point the training providers would be required to re-apply for certification. All training providers should be listed on a database maintained by the DOT. The awarding body for the TM CPC could be the DOT or it could be externally resourced to a third-party group or institution.

The minimum standard entry requirement of an NFQ Level 4 should be monitored via the training providers. Upon registration for the course, all students must send proof of an NFQ Level 4 certificate to their respective training provider.

Training

The standard of training would be maintained at 100 hours and would be delivered by certified training providers approved by the DOT. The training providers would develop their own content and deliver the course using either a physical manual or e-learning material, including but not limited to PowerPoint slide-decks, PDF materials, sample answers and learning outcomes. Training providers would be entrusted to include learning outcomes for each of the eight subjects listed in Annex I. of EU 1071 to enhance the overall learning experience.

The use of learning outcomes would give the training providers more direction in terms of delivering the necessary training to allow for efficient learning. Previous exam papers would also be provided by the awarding body to assist training providers in developing content in line with the questions from the previous exam sitting. Sample exam questions and answers may be developed by training providers for use within the training course.

It is anticipated that permitting training providers to develop their own content would increase competition within the market, resulting in the best available course at the best available price for participants. Training providers would also be trusted to update the material after each exam series, ensuring the content stays relevant and compliant with EU 1071.

Exam Administration

The awarding body would be responsible for the formation, regulation and correction of all TM CPC exams. This work would be outsourced to a group of external SMEs. The exam would be maintained as two separate exam papers, both requiring a 60% pass mark. Each exam paper would be worth 400 marks (800 marks in total) and each paper would be split into four sections with a weighting of 100 marks each. The four sections would be based on the current examination sections and would be maintained as follows:

- The first section would be comprised of MCQ's;
- The second section would be comprised of a number of short questions;
- The third section would be a case study question; and
- The final section would be two long questions.

There would be two exam series per year and they would be held in designated exam centres.

Models: Analysis and Appraisal

At the end of each exam series, an exam feedback report would be published by an individual nominated by the awarding body. This report would be circulated to all training providers. This report would include the success rate on each question, comments on each question and an overall comment on the exam. Training providers would use this report to anticipate the upcoming questions for the next exam series. This report, combined with the subjects outlined in EU 1071, would be used to assist in the development and maintenance of the learning material.

Entry Requirement

There would be a minimum standard entry requirement of an NFQ Level 4 Certificate. Students who do not acquire an NFQ Level 4 Certificate must register on a pre-training course prior to registering for the standard 100 hour course. The pre-training course would be developed by training providers and would consist of an introductory course to the modules covered in the syllabus. The pre-training course should be approximately two days in duration.

Optional Professional Development

A refresher course would be implemented every three years as an optional training course. The purpose of this refresher course would be to provide legislative updates to those transport managers actively working in the industry. The refresher course would be developed by a certified training provider and would be delivered in an online setting. There would be no form of final assessment and the price of the course would be determined by the training provider.

Cost

The cost for the refresher course, the pre-training course and the 100 hour training course would be at the discretion of the training provider.

It is acknowledged that as there could be additional opportunities for the training providers to increase their revenue, the DOT could be in position to consider increasing the current application fee to certify training providers.

The exam fee for students should balance with the cost of externally resourcing SMEs to formulate and correct exam papers.

It is not expected that there would be an increase of fees included in model four however, it must be noted, any increase in fees would involve an amendment to Statutory Instrument No. 460 of 2015 Road Transport Operator Licensing (Fees) Regulations and would require the approval of the Minister for Public Expenditure and Reform and the Minister for Transport.

Models: Analysis and Appraisal

Model Four Appraisal

Feasibility

Similarly to model three, model four also requires the training providers to develop their own training content and to set their own prices accordingly. In addition to the subjects listed in Annex I. of EU 1071, training providers would also reserve the right to develop additional modules covering topics such as human resource management and people skills management. The use of an exam report following every exam series could be beneficial to the training providers developing content as it would provide an insight to what is expected from the awarding body. The exam report could include, but is not limited to, sample answers, challenges faced by students and key notes to be taken away from the exam. This is a process that is stated as working well in the UK and has the potential to increase the standard of learning material in Ireland. Although there is a significant reliance on the training providers to create course content, it would remove the need for the DOT to fund a third-party training content provider. Similar to model three, this increases the feasibility of the model in terms of implementing change and increasing cost-effectiveness.

A major difference in this model compared to the benchmark model, model one, is the introduction of a minimum standard entry requirement. It was suggested by the majority of Irish stakeholders consulted with that a form of entry requirement whereby students must attain at least an NFQ level 4 should be implemented. This was suggested, predominantly by training providers, to help reduce the number of students registering for the course, finding the course too challenging and failing the exam. EU 1071 states the minimum level at which the training should be delivered “may not be below level 3 of the training-level structure laid down in the Annex to Council Decision 85/368/EEC” which is otherwise equivalent to the NFQ Level 4. As the standard of training is set at the equivalence of an NFQ Level 4, it was believed by the training providers consulted with that this would be an appropriate entry requirement level if deemed a desirable option. It should be noted that such a measure would unduly exclude candidates who may have abilities undemonstrated by certification.

Implementing a change at a scale such as this would impact the ease of implementation for the model. The introduction of an entry requirement may require some form of external resourcing to monitor and control the change. This may impact the cost-effectiveness of the model therefore reducing its feasibility.

Acceptability

The favorability of this option for training providers is perceived as high for this model as it is largely based on their recommendations as part of the consultation process. The impact of implementing a minimum standard entry requirement could affect the number of students registering for the course and therefore the total number of students sitting the TM CPC exam. This could result in a reduction in income for the awarding body and therefore increase resistance levels amongst a number of stakeholders.

Additionally, it is understood that there may be significant resistance from a large pool of prospective students who do not attain a NFQ level 4. The introduction of an entry requirement would be exclusionary and could restrict opportunities for anyone without a NFQ level 4. It is for this reason it is expected that there would also be a strong resistance from the DOT. The overall acceptability for this model is low with the exception of the training providers.

Suitability

Similarly to all other models included, the training content and examinable material must assess the levels of knowledge as set out in Annex I. of EU 1071 and therefore the model is viable in terms of its suitability and compliance.

In terms of the model's capacity to support future-proofing, the introduction of an entry requirement may impact the number of transport managers being produced each year. A reduction in the number of transport managers could potentially be damaging to the industry. Although the model could work as a viable system, the potential impact on the industry suggests the model is not as desirable as the previous models.

Conclusion

Similarly to model three, the concept of permitting training providers to develop their own content would avoid the need for initial one-off funding from the DOT to resource SMEs or a third-party training content provider. This would also avoid tendering processes which would affect the duration and ease of implementation. However, this model does require a substantial amount of trust being given to training providers to efficiently carry out their role without an auditing process. The requirement of this level of trust is not an appropriate method of conducting the TM CPC programme and therefore significantly reduces acceptability.

Models: Analysis and Appraisal

However, the introduction of a minimum standard entry requirement reduces the feasibility, acceptability and suitability of the model. Monitoring and controlling the change required to introduce an entry requirement may impact the implementation process and result in additional costs for the DOT. The acceptability would be strong from the training providers, but it is understood from the consultation process that there would be significant resistance from all other stakeholders.

Finally, the impact of an entry requirement for students could reduce the number of transport managers being produced each year. This could risk damaging the transport industry in Ireland and therefore reduces the suitability of the model. While model four has many merits, the risk of damaging the transport industry through the introduction of an entry requirement impacts the feasibility, acceptability and suitability of the model. Therefore model four is not considered as the recommended model.

Models: Analysis and Appraisal

Model Five Descriptor

The fifth model is based on the consultations held with international stakeholders. As outlined, Grant Thornton met with five key international stakeholders: Latvia; Sweden; the Netherlands; the UK; and France. This fifth model is based on the strengths, recommendations and suggestions gathered from those consultations, together with a thorough desk research process.

Syllabus

The TM CPC syllabus should provide the necessary knowledge and skills to perform as a competent transport manager as set out in EU 1071. The development of the training content would be externally resourced by a third-party training content provider who may be based in Ireland or abroad. The third-party training content provider would be responsible for supplying training providers with the necessary materials, including but not limited to a training manual, to deliver up-to-date TM CPC training courses.

Oversight

Training providers would be responsible for delivering the course in line with what is outlined by the third-party training content provider. The awarding body should monitor, assess and provide feedback to the third-party training content provider regarding the training content on behalf of the DOT. This would help to ensure the content of the course is both continuously compliant with EU 1071 and that the content is relevant to the TM CPC exam.

The awarding body would reserve the right to audit the training providers at least once a year to ensure the course is delivered effectively. All training providers must be certified by the DOT to deliver the TM CPC course. Training providers would apply for certification through the DOT and would be subject to an application fee as determined by the DOT.

Training

There would be a minimum standard training requirement prior to registering for the TM CPC exam as per the aspirational recommendations from the international stakeholders. The minimum standard training requirement would remain at 100 hours. The content of the training course would be delivered by certified training providers and should be audited by the TM CPC awarding body to ensure the course content, developed by the third-party training content provider, is being appropriately delivered in class. The role of the awarding body would be externally resourced by the DOT.

The course would be predominantly delivered through the use of PowerPoint slide-decks and printable PDF learning material developed by a third-party training content provider. All training providers would offer a universal standard training course at a fee which they would determine.

Exam Administration

The formation, maintenance and correction of all TM CPC exams would be the responsibility of the awarding body. The awarding body may outsource these activities to external SMEs. The exam content would be regularly updated and would remain compliant with the list of subjects set out in Annex I. of EU 1071. The exam would consist of two papers, requiring an overall pass rate of 60% in line with EU 1071. Both papers would be comprised of MCQ's, short and long questions and a multi-disciplinary case study question.

There would be two exam series per year with the option of adding a third exam series where there is a likely projection of a surplus of students. The exam questions bank would be updated for every exam series.

Entry Requirement

There would be no minimum standard entry requirement for the TM CPC programme. EU 1071 states the minimum level at which the training should be delivered "may not be below level 3 of the training-level structure laid down in the Annex to Council Decision 85/368/EEC", which is otherwise equivalent to the NFQ Level 4.

Optional Professional Development

It should be noted that there are no compulsory CPD or compulsory refresher training requirements in any EU Member State or in the UK currently.

Based on recommendations received from all five international stakeholders during consultation, it was proposed that there should be a form of refresher training implemented for transport managers. This refresher training was not unanimously recommended as training that should be compulsory across all five international stakeholders consulted with.

This refresher training programme, if introduced, would be recommended to be 35 hours in duration, based on the current refresher training course in France and would take place periodically throughout the year. Similar to what is currently offered in the UK, it is expected that training providers would develop this refresher training course for the benefit of transport managers.

Models: Analysis and Appraisal

Cost

Training providers would set the price of the training course to cover their own costs, as well as the cost of the TM CPC exam which would be set by the awarding body. The outsourcing of an external third-party training content provider would require 100% funding by the DOT.

In terms of the refresher training course, the fee would be determined by the training providers. As all training providers would be given the responsibility of developing the content for this course, it's expected that there could be significant competition to develop the best available course for the best available price.

There is no commitment from model five to increase examination fees. However, it must be noted that any increase in fees would involve an amendment to Statutory Instrument No. 460 of 2015 Road Transport Operator Licensing (Fees) Regulations and would require the approval of the Minister for Public Expenditure and Reform and the Minister for Transport.

Models: Analysis and Appraisal

Model Five Appraisal

Feasibility

The fifth model was formed from the qualitative data gathered as part of the consultation process with international stakeholders. This model, similar to model two, requires the need for a third-party training content provider. As described in the prior appraisals of the identified models, this reduces the feasibility in terms of the model's cost-effectiveness, ease of implementation and duration of implementation.

Similar to model one, model five also requires a minimum standard training requirement of 100 hours. A universal training standard would be delivered by all certified training providers. The third-party training content provider would require ongoing review. This ongoing review would be the responsibility of the awarding body, but would likely require funding from the DOT. This ongoing review would likely be externally resourced by SMEs which would impact the implementation process of the model.

It is acknowledged that a change process would be required to implement the refresher training course. It is understood from stakeholder consultations that initiating a refresher training programme should benefit transport managers, especially those wishing to learn the latest legislative changes. As the refresher training course is an optional element of the programme within this model, neither the DOT nor the awarding body would be required to be involved during implementation which also impacts the feasibility of this model.

These factors reduce the feasibility of the model in terms of the model's implementation, duration and cost-effectiveness.

Acceptability

Model five is similar to model two in terms of the way the TM CPC programme is delivered. Model five requires a third-party training content provider to develop learning materials compliant with the TM CPC exam and EU 1071.

The third-party training content provider would be audited by the awarding body to ensure that content stays relevant and compliant. Due to the similarities of this model with model two, it is believed that the awarding body would be in favour of implementation.

Training providers would be expected to oppose this model more than model four. However, there are elements which they would be expected to be in favour of, such as the supply of professional learning materials. Training providers would also be provided the opportunity to develop the refresher training course and set the price of the course accordingly.

The students would also have comprehensive learning materials developed by a third-party training content provider. Therefore it is understood that students would also welcome this model.

This model is believed to receive a moderately positive acceptability rating among the training providers, students and the awarding body. However, the dependency on a third-party training content provider to create all of the training content would involve a significant amount of oversight and funding. This may reduce the acceptability from the DOT.

Suitability

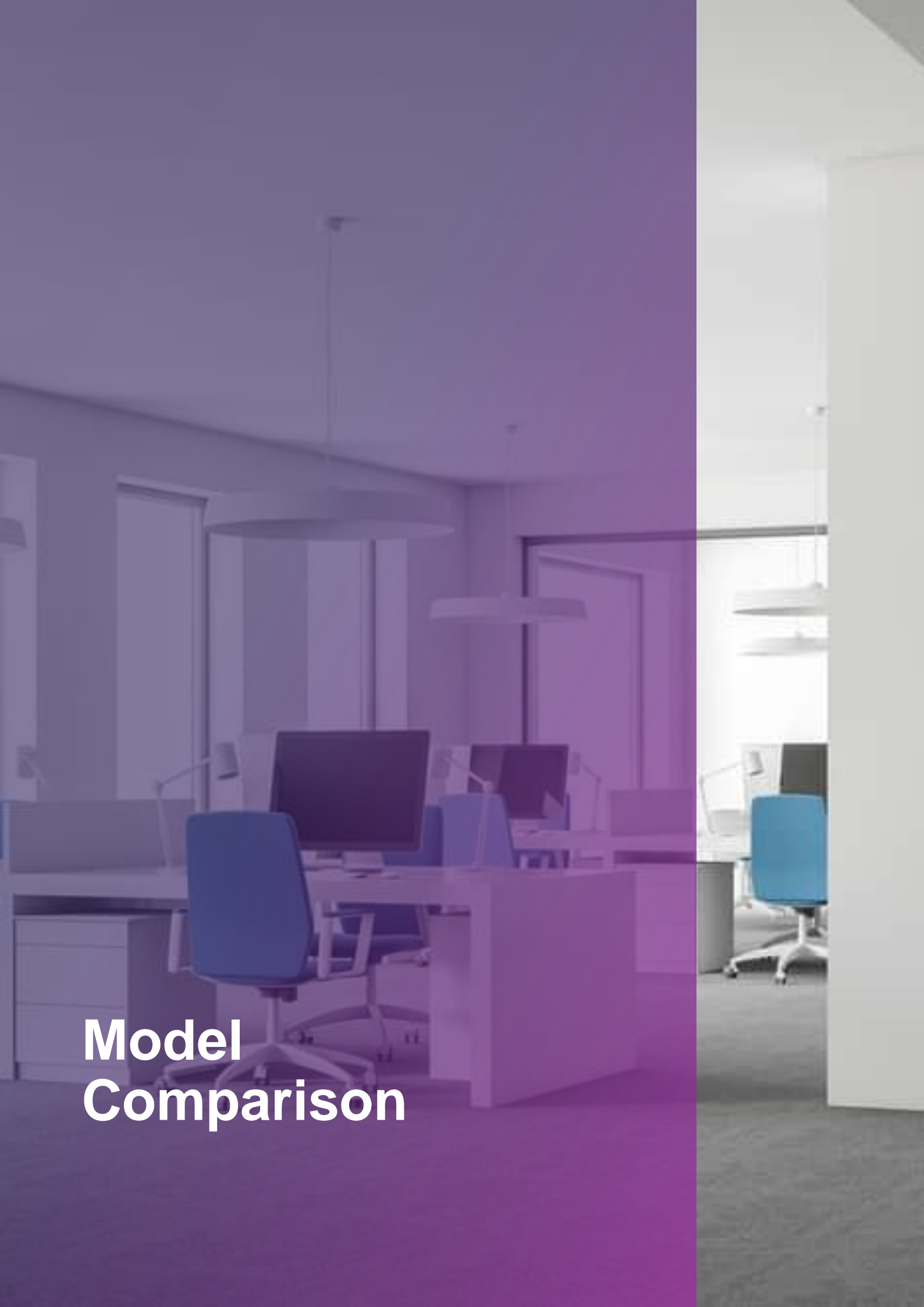
This model relies on the TM CPC training content to provide the necessary knowledge and skills, as set out in EU 1071, to perform as a competent transport manager. The requirement of a third-party training content provider, as well as the introduction of a refresher training course, enhances the model's suitability. However, without a commitment to the increase the examination fees, challenges may arise in meeting ongoing costs associated with the delivery of the TM CPC. It is therefore believed that the model's current construct may not have the capacity to support future proofing of the proposed model. It is for this reason that model five is not deemed suitable in its entirety.

Conclusion

Model five presents elements of best practice from other jurisdictions. Each element has merit in its own right and would be well received by some stakeholder groups. However, while elements of model five may constitute an improvement on the current structure, they may still be sub-optimal in how they are structured.












































































The suggestions and inputs from international jurisdictions can be prescriptive, failing to take into account nuances within the Irish sector. Additionally, the model suggests significant change without a commitment to increase examination fees. While one off funding may be provided, a long term challenge may arise in terms of meeting ongoing costs associated with the delivery of the TM CPC. Furthermore, the current situation and need for review has arisen in part due to frequently changing EU legislation. Yet in spite of this, the need to future proof training content and standardise the level of delivery are not components of this model.

The model has many merits however, it is not considered to be a long term sustainable solution. The model should not be considered as the final direction for the TM CPC programme but should inform the design of the final direction.

A modern office interior with several desks, computers, and blue ergonomic chairs. The office has large windows and modern lighting fixtures. A purple gradient overlay covers the left and center portions of the image.

Model Comparison

Model Comparison

Criteria	Model One	Model Two	Model Three	Model Four	Model Five	Comment
Mandatory training before exam						Based on the models' analysis, it is believed that mandatory training should be maintained.
Training providers certified/approved						Grant Thornton identifies no reason to deviate from common practice.
Training providers audited through on-site visits						Site-visits audits should be carried out where the learning materials are not universal.
Training material available in digital format						For ease-of-learning purposes, learning materials should be offered in a digital format.
Prescribed training manual for providers						A training manual should be made available as a reference guide for the programme.
Supplementary training materials generated by training providers						Training providers should have the opportunity to develop their own materials.
Supplementary training materials supplied to training providers						Supplementary training material may be offered as an additional commercial activity.
Additional training modules recommended outside Annex I.						EU 1071 does not require additional modules and may cause issues of practicality.
Minimum standard entry requirement						An entry requirement should not be implemented to prevent any damage to the industry.
Increase in fees						Any increases in exam fees are would be set by the relevant Minister(s).
Change to current exam format						Necessary to provide an exam which assesses knowledge retention and application.
Sample exam papers published						Sample papers with sample questions should be published by the awarding body.
Past exam papers published						Sample papers based on recent exam papers should be published.
Compulsory CPD recommended						Compulsory CPD may result in significant resistance from stakeholders.
Optional CPD recommended						Training providers should have the opportunity to provide optional CPD courses.



Our Suggestion

Our Suggestion

Descriptor

Grant Thornton identified significant strengths and weaknesses across each of the five models as part of the appraisal process. To provide our final suggestion, each of the models were critically assessed under their sub-headings in terms of feasibility, acceptability and suitability. After thorough deliberations, Grant Thornton have identified a model based on the most feasible, acceptable and suitable aspects from each of the five models.

Due to the feedback gathered from international stakeholders, it is understood that managing the TM CPC programme without the use of an external awarding body provides too many challenges which can impact the efficiency of the programme. The appointment of the awarding body is subject to legal advice and procurement procedures, as may be applicable. Regarding this, the DOT must follow EU procurement rules and any legal advice received.

Our suggestion is outlined below.

Syllabus

The awarding body must identify the competencies, knowledge and skills required to carry out the duties of a professional transport manager. These competencies must align with the eight subjects listed in Part I. of Annex I. of EU 1071. Based on a gap analysis provided by CILT to the DOT and shared with Grant Thornton, the current training manual is suggested as not being fit-for-purpose and a new training manual should be produced. The new training manual would be provided by the awarding body, either developed by a procured third-party training content provider, or using in-house expertise, if available. The training manual would be supported in both a physical and digital format and access to a copy of the manual should be supplied to all registered students as part of the examination fee.

Supplementary training material for training providers may be provided by either the awarding body or a third-party training content provider as an additional commercial activity. The opportunity to provide additional training material is open to any supplier.

The new training manual must be reflective of the subjects listed in Annex I. of EU 1071 and the content would be based on the competencies, knowledge and skills, as identified by the awarding body. Grant Thornton suggests that the eight subjects listed in Annex I. of EU 1071 should be codified into learning blocks rather than stand-alone chapters. The use of learning blocks segments the programme into examinable areas which would be expected to distil the content into a more digestible and learning friendly structure. This is similar to the current TM CPC structure in the Netherlands who also

codify their training material to enhance the learning experience.

Based on feedback from consultations, learning outcomes for each learning block should be included within the training manual to enhance the overall learning experience. The awarding body or a third-party training content provider, if applicable, should identify appropriate learning outcomes, approved by the awarding body. The use of learning outcomes would provide direction in terms of delivering the appropriate training content to students.

Based on desk research and inputs provided to Grant Thornton, a suggestion for the learning blocks is as follows:

- Managing Business Operations.
- Managing Drivers.
- Managing Compliance and Risk.
- Managing Transport Operations.

Oversight

The awarding body would be responsible for all quality control measures relating to the standard of delivery, the training manual and the development and provision of examinations. The standard of training delivered by training providers would be subject to an auditing process as outlined below.

Training providers have the option to develop and use their own learning material to complement the newly developed training manual. Training providers would be responsible for the upkeep of their own learning materials, ensuring that the content being delivered is in line with the newly developed training manual. The standard of training would be audited by SMEs resourced by the awarding body, to ensure the appropriate content is being taught. This auditing process would be completed through site-visit audits.

The SMEs may be resourced by the awarding body either through in-house capabilities, third-party procurement or through the development of a consortium. The awarding body must demonstrate that they have, or can resource, the knowledge to assist a third-party training content provider, if required, to develop and update the training manual on an ongoing basis. This is to ensure the training manual is suitable and appropriate.

If available, any supplementary training material, whether developed in-house by the awarding body or by a third-party training content provider, may be purchased by training providers. Such supplementary material would not be subject to a formal auditing process.

Our Suggestion

The awarding body must demonstrate that they have, or can resource, the knowledge to carry out the proposed auditing process. If recruiting third-party SMEs, the awarding body should ensure that a transparent and fair procedure is applied in the recruitment of such experts. The awarding body would also regularly review the appropriateness of all associated third-party/externally resourced SMEs.

All training providers would be subject to a certification/renewal process, in line with the established set of criteria, identical to the current process, which would take place every 12 months. Prospective training providers would apply for certification/renewal through the awarding body who would then assess the application and recommend either approval or refusal to the DOT. All training providers should be listed on a database which would be managed by the awarding body. This certification/renewal process would be subject to an application fee as set out in the Statutory Instrument No. 460 of 2015 Road Transport Operator Licensing (Fees) Regulations.

The awarding body would be solely responsible for formulating, providing and correcting the exams. The awarding body would, at their own expense, audit the training providers at least once a year to ensure the course is delivered effectively. Information gathered during consultation suggests that, in terms of oversight, the current TM CPC model works well; however, there is an opportunity to strengthen the auditing process. Site-visit audits should be incorporated as part of the awarding body's oversight of the programme. Site-visit audits assess the appropriateness of the training content being taught. These site-visit audits would be the responsibility of the awarding body. This auditing process would be important to ensure training providers are teaching the TM CPC programme at a standard deemed acceptable by the awarding body.

As determined during the consultation process, key stakeholders were concerned that unregulated training can result in a poor standard of quality. To mitigate this, Grant Thornton suggest that the awarding body would monitor the training providers through site-visit audits ensuring a high standard of teaching.

Training

The standard of training would be maintained at 100 hours. It was understood from the consultation process with both Irish and European stakeholders that removing or reducing the 100 hours minimum standard training requirement may result in negative consequences in course quality.

European Member States such as France and the Netherlands offered that an appropriate minimum standard training requirement should be a compulsory element of the TM CPC programme.

It was also stated by the majority of Irish stakeholders that the current minimum standard training requirement in Ireland is sufficient and requires no change. In light of these comments, Grant Thornton suggests that the minimum standard training requirement of 100 hours should remain.

To assist training providers in delivering an effective TM CPC course, it is proposed that a suggested minimum of 20% of questions in the sample papers are taken from recent exam papers with the remaining 80% being sample questions. The percentage of sample papers derived from recent exams may be increased on an incremental basis during implementation. This approach may result in a higher TM CPC exam success rate as students may be further prepared for the upcoming exam.

This suggested model includes the use of a third-party training content provider if necessary capacity or capability is unavailable in-house within the awarding body for the development of an up-to-date training manual. The awarding body and/or a third-party training content provider have the option to provide supplementary training material as an additional commercial activity.

To produce a suitable training manual, the awarding body and/or third-party training content provider, if required, must ensure the necessary content is relevant, appropriate, up-to-date and aligned with EU 1071. If required, the third-party training content provider should be a market leader in the supply of training material with sufficient experience in CPC training. Selection of the provider must follow applicable procurement rules.

The delivery of the course, whether delivered in a classroom or taught online, would be at the discretion of the training providers. Training providers may develop their own learning materials. If supplementary training materials are made available for purchase, the training providers may also opt to use them. Whether the training providers develop their own learning materials or purchase them from a third-party, the content delivered must be in line with the newly developed training manual.

The opportunity for training providers to develop their own content, based on a new training manual, may result in more opportunities to increase their reputation/income based on the quality and price of their course. It is anticipated that this approach would result in the training provider providing the best available course at the best available price to maximise their market share.

Our Suggestion

Exam Administration

Within this proposed model, exam administration and certification would be the responsibility of the awarding body. Exam questions would be based on the learning blocks, previously mentioned under 'Syllabus'. These learning blocks would assess the competencies identified by the awarding body aligning with EU 1071. The exam would be comprised of two papers with each paper worth 400 marks, giving a total of 800 marks. The exam papers would be configured with half of the available marks as MCQ's and short questions and the remaining half incorporating a multi-disciplinary case study question. A closed-book exam assessing the candidates' knowledge retention should be complemented with an open-book exam. It is acknowledged that a significant change process would be required to move away from the current open-book assessment outlined in model one. The newly developed training manual should complement the ease of implementing changes to the exam format. This process could be completed on an incremental basis to help stakeholders adapt to the changes.

The first exam comprising of MCQ's and short questions would be a closed-book exam to assess the retention of fundamental and safety-critical items. Based on stakeholder consultations and desktop research, it is understood that the application of a closed-book exam is best practice for the assessment of more fundamental and safety-critical elements of professional competence. Various other EU Member States, as well as the UK have incorporated a closed-book assessment format into their respective TM CPC exam process. The implementation of a closed-book exam in Ireland deviates from the current state depicted in model one, however Grant Thornton believes it would be counter-intuitive for the TM CPC exam to remain open-book in light of current European best practice.

The open-book element of the exam should be maintained to allow the newly developed training manual to act as a 'reference guide'. It is suggested that the case study section of the exam should incorporate an open-book format to enable the assessment of the application of relevant material. There would be separate exam papers for road haulage and passenger transport operators and the frequency of the TM CPC exams would be held in line with demand, but not less than twice a year.

The overall passing grade would be maintained at 60% with a minimum single paper pass rate of 50% expected. The exams would take place physically in an approved exam centre which would be invigilated throughout. The awarding body would maintain responsibility for developing, overseeing, invigilating and correcting all exams, as well as issuing the certificate.

Grant Thornton suggests that the awarding body must examine and assess the TM CPC programme as they deem appropriate whilst remaining compliant with national and European legislation.

Entry Requirement

There should be no minimum standard entry requirement for the TM CPC programme. Any person could register for a TM CPC course via one of the approved training providers. EU 1071 states the minimum level at which the training should be delivered "may not be below level 3 of the training-level structure laid down in the Annex to Council Decision 85/368/EEC" which is otherwise equivalent to the NFQ Level 4.

Although it was believed by a significant number of Irish training providers during consultation that some form of entry level should be required, other consultations with the DOT, industry representative bodies and European stakeholders suggest implementing a change such as this could be damaging to the industry. An entry requirement could exclude candidates with practical expertise rather than academic achievement. Introducing a minimum standard entry requirement could reduce the number of students registering for the TM CPC programme and therefore risk a reduction in the number of transport managers being produced each year.

For those who may have entered the industry at a lower level, e.g. as a driver or warehouse operative, introducing a minimum entry requirement would act as an obstacle to advancing their career as a transport manager. This may have an impact on the road transport industry within Ireland. The introduction of an entry level requirement would also be expected to restrict opportunities for many individuals wishing to enter the road transport industry. As discussed during the consultation process, not allowing an individual to enter the road transport industry based on their previous education would be deemed ethically inappropriate. In recognition of this concern, Grant Thornton do not offer that any introduction of an entry requirement should be incorporated into the programme.

Our Suggestion

Optional Professional Development

It was evident from the consultation process with both Irish and European stakeholders that a mechanism enabling certified transport managers to enroll on a professional development course should be incorporated into the TM CPC programme.

A concern cited from the consultation process was that implementing a compulsory refresher training course may evoke significant resistance from transport managers. This was a concern particularly expressed by representatives in France, as well as by multiple Irish transport managers. After analysis of the UK model, who offer refresher training as an optional extra, Grant Thornton suggest that this could be an appropriate element for the Irish TM CPC programme.

There would be no mandatory form of CPD or re-certification, however training providers would be permitted and encouraged to offer a refresher training course as an optional extra for anyone who wishes to learn the most up-to-date information regarding TM CPC. Refresher training should be endorsed by the awarding body for the benefit of the students and the training providers. The refresher training course should be developed by the training providers at a price determined also by the training providers. The refresher training course would not include any form of final assessment.

As outlined in EU and Irish legislation, transport managers who are found to be in breach of regulations and who are therefore declared unfit would be required to undertake rehabilitation measures, which may include training or re-examination. This optional professional development course could be utilised as a rehabilitation measure if deemed appropriate.

Similar to the UK model, it should be left to the discretion of the training provider whether or not they wish to offer a refresher training course. Training providers would be permitted to develop their own refresher course and set their own prices. The establishment of an optional professional development model could provide more opportunities for training providers to generate more income. Based on the feedback provided by representatives in the UK, Grant Thornton propose that introducing an optional refresher training course could benefit certified transport managers, as well as the training providers.

Cost

There are two types of cost associated with this project which include but may not be limited to:

- An initial one-off capital cost funded by the DOT; and
- Annual recurring costs which would be the responsibility of the awarding body, e.g. exam administration.

The initial one-off capital funding would be required for, but not limited to, the following:

- The procurement of an external third-party training content provider, if expertise is unavailable in-house;
- SME support, whether procured or in-house;
- Publishing, printing and issuing the training manual;
- Awarding body project management;
- Updating the exam questions bank and developing sample answers; and
- Contingency costs.

In terms of the recurring annual costs, the awarding body would operate under a funding model to cover costs relating to, but not limited to, the assessment of training provider applications, SME support, the training manual, exam administration and the auditing of training providers.

Fee increases for students and/or training providers may be required to support a new TM CPC programme. Alternatively, the DOT reserve the right to provide additional funding to the awarding body to avoid any associated price increases. It should be noted that an increase in fees would involve an amendment to Statutory Instrument No. 460 of 2015 Road Transport Operator Licensing (Fees) Regulations and would require the approval of the Minister for Public Expenditure and Reform and the Minister for Transport.

Based on the information gathered and the consultation process, Grant Thornton propose that investment of funding from the DOT to support this model would result in an improved, functional, future-proofed, relevant and appropriate TM CPC programme.

Our Suggestion

Appraisal

Feasibility

Our suggestion has been developed through the analysis of the five models identified by Grant Thornton and extracting the strengths from each one.

The suggested model includes a new training manual to be provided by the awarding body, either developed by a procured third-party training content provider, or using in-house expertise if available, based on the competencies, knowledge and skills outlined in Part I. of Annex I. of EU 1071. The syllabus would be codified into learning blocks using the competencies, knowledge and skills required to carry out the duties of a professional transport manager. This is similar to the current structure of the TM CPC programme in the Netherlands who also codify their training material. This suggested model would require initial one-off funding from the DOT to initiate the project. Outputs of this funding would include an updated training manual and the development of a supportive and robust auditing process, which, after initial funding, would be covered by the awarding body's annual funding model.

This suggested model creates a dependency on a third-party training content provider if the expertise is unavailable within the awarding body. Such a scenario would be expected to decrease the ease of implementation and cost-effectiveness of the model. However, if required, the outputs offered by a third-party training provider are crucial to the success of an efficient and effective up-to-date TM CPC programme. The use of a third-party training content provider would require necessary public procurement procedures and, if required, the expectation is that the DOT would fund the awarding body in the resourcing of a third-party training content provider. Subject to legal advice and procurement procedures, the appointment of the awarding body may also require a public procurement process.

The training manual developed by either the awarding body in-house or through the use of a third-party training content provider would be included as part of the examination fee. It is recognised that there may be an increase in fees in light of the redeveloped training manual. If fees increased and the training manual was not provided to students as part of the examination fee, then a high level of resistance from students and training providers would be expected. As per the "As-Is" in model one, the training manual is currently provided to all students as part of the examination fee. It is believed for ease of implementation purposes, this should be maintained. The training manual should be redeveloped as a "go-to" guide for transport managers and therefore, it is believed that it would be counter-intuitive to not supply the training manual to students as part of the examination fee.

Training providers may also opt to use supplementary training materials from either the awarding body or a third-party training content provider to assist them in delivering the course, if such materials are made available for purchase. Producing supplementary training material is not a mandatory aspect of this model however, either the awarding body or a third-party training content provider have the option to do so as an additional commercial activity. Training providers also have the option to develop their own training materials providing that material is in line with the newly developed training manual. Allowing training providers to develop their own learning materials may increase market competitiveness which could be seen as an opportunity for many training providers.

Training providers would be responsible for the maintenance of their own learning materials, ensuring that the content delivered is in line with the newly developed training manual. Training providers should be audited by the awarding body through site-visit audits to ensure the course is being delivered at the appropriate standard. SMEs, resourced by the awarding body, would be utilised to carry out these on-site audits and would require recurring funding. This funding ensures that content is kept compliant with the syllabus and EU 1071.

There would also be the introduction of a refresher training course which would not act as a compulsory element. The refresher training course could be offered to students who wish to keep abreast of the most up-to-date information. The course would not require the need for third-party involvement as the content would be developed by the training providers who would use the redeveloped training manual as a basis. This may pose as a cost effective manner to implement a refresher training course while still providing the opportunity for training providers to develop their own course and set their own prices as requested by many training providers during consultation.

In summary, this suggested model appears to be viable in terms of its feasibility. The funding requirements and use of a third-party training content provider, if the expertise is unavailable within the awarding body, are critical to the implementation of an efficient TM CPC programme.

Acceptability

SMEs would be required to review the training manual to ensure the material is suitable on an ongoing basis. Resourcing the SMEs would be the responsibility of the awarding body, either through in-house capabilities or resourcing third parties.

Our Suggestion

Any updates would be shared with the third-party training content provider, where engaged, to incorporate. This process ensures the content remains suitable on an ongoing basis.

Training providers may also develop supplementary training materials or purchase them, if such materials are made available for purchase from either the awarding body or a third-party training content provider. If purchased, supplementary training material may be used to eliminate the need for self-developed training content. It should be noted that supplementary training material would not be subject to a formal auditing process.

Training providers would compete with one another to provide the best refresher course available at competitive prices. It is expected that this would provide further opportunities for training providers and therefore would experience little resistance.

To support an updated and future-proofed TM CPC programme, an increase in fees may be required. Therefore, to help reduce any resistance to this possibility, additional incentives should be included. These additional aspects include, but are not limited to:

- the inclusion of a newly developed training manual within the exam fee;
- the availability of previous exam questions within sample papers;
- the inclusion of learning outcomes for each learning block within the training manual; and
- the opportunity to develop appropriate and relevant training content for the TM CPC programme and the optional refresher training course.

As a whole, it is understood that there would be little resistance from the training providers regarding this model in its entirety.

This model also provides a number of benefits for the TM CPC students and therefore it is believed that there would be minimal resistance from this stakeholder group.

Students would be provided with a newly developed training manual created by either the awarding body or a third-party training content provider, if engaged. The training manual would be reviewed by the awarding body's SMEs on an ongoing basis to future-proof the programme and ensure the material stays relevant and up-to-date. The addition of site-visit audits to the current auditing process ensures the training content is regularly up-to-date and at a standard deemed acceptable by the awarding body.

Students would also benefit from the addition of learning outcomes which should be included within the training manual. Learning outcomes provide direction to students in terms of key information within a learning block. The inclusion of learning outcomes are expected to increase the overall learning experience.

Although the DOT would have initial one-off costs to fund the new TM CPC programme, the implementation of the programme would be considered to be straight forward. Implementation would be expected to commence once a funding model has been agreed and any necessary tendering processes have taken place. Outputs of this funding would include an updated training manual, a supportive and robust auditing process and an efficient and effective future-proofed TM CPC programme.

Due to the expected high acceptability of this model to the awarding body, training providers and students, it is believed there would be a high acceptability rating from the DOT regarding the implementation of this model.

Suitability

As previously outlined, this model is future-proofed and built on the eight subjects listed in Annex I. of EU 1071. To support future-proofing, this model includes an updated training manual and the development of a supportive and robust auditing process, which, after initial funding, would be covered by the awarding body's annual funding model. The awarding body would take responsibility for the redeveloped training manual itself. In a scenario where a third-party training content provider is engaged, the awarding body would provide oversight on an ongoing basis to ensure the content stays up-to-date and compliant with the frequently changing legislation.

This model also includes a cost-effective refresher training course as an optional commercial activity. This commercial activity supports future-proofing by providing an opportunity to TM CPC holders to acquire knowledge on the most up-to-date legislation concerning transport managers.

This model has the capacity to support future-proofing in addition to adherence with EU 1071.

Our Suggestion

Conclusion

This suggested model is outlined to be the most feasible, acceptable and suitable model for consideration. The model is feasible in terms of its ease of implementation, cost-effectiveness for the necessary outputs required and duration of implementation. The acceptability rating of this model is believed to be high by all four key stakeholder groups. Finally, in terms of suitability, the model supports future-proofing requirements and is compliant with EU 1071.

Grant Thornton propose that this model is the most viable and appropriate model that the DOT should consider.

A table highlighting and justifying the specific criteria included in this suggested model is shown on the following page. The overleaf table is a snapshot of this model which includes a column summarising the reason for the inclusion of certain elements.

Our Suggestion

Criteria	Our Suggestion	Comment
Mandatory training before exam		Based on recommendations from both Irish and international stakeholders, it is understood that it is best practice to maintain mandatory training before the TM CPC exam.
Training providers certified/approved		Based on best practice, all training providers would be subject to a certification/renewal process, in line with the current established set of criteria, which would take place every 12 months.
Training providers audited through on-site visits		It is suggested that there would be a need to review the standard of teaching on an ongoing basis through site-visits.
Training manual available in digital format		The training manual would be supported in both a physical and digital format and access to a copy of the manual should be supplied to all registered students as part of the examination fee.
Prescribed training manual		The new training manual, developed in-house by the awarding body or by a third-party training content provider, would be provided by the awarding body to registered students as part of the examination fee.
Training content developed by training providers		Training providers would be permitted to develop their own learning materials. However, the standard of delivery would be audited by the awarding body to ensure content aligns with the training manual.
Supplementary training materials supplied to training providers		Supplementary training material for training providers may be provided by either the awarding body or a third-party training content provider, if engaged, as an additional commercial activity.
Additional training modules recommended outside Annex I.		The implementation of additional modules for the TM CPC programme is not required by EU 1071. Transport managers can undertake additional modules in other relevant programmes.
Minimum standard entry requirement		There would be no minimum standard entry requirement to mitigate the risk of damaging the industry by restricting the number of eligible candidates and reducing the number of transport managers.
Increase in fees		To support an updated and future-proofed TM CPC programme, additional funding would be required. An increase in fees may be required to support the additional aspects of the programme.
Change to current exam format		Open and closed-book exam format to assess the application of knowledge, as well as knowledge retention. This could be achieved incrementally to help stakeholders adapt to the changes.
Sample exam papers published		In line with what is currently offered, it is expected that sample exam papers will remain available to download from the awarding body website.
Past exam papers published		Based on common practice in other European countries, it is recommended that a suggested minimum of 20% of the sample exam questions should be taken from previous exam papers. This could be increased beyond 20% over time as the question bank is developed.
Compulsory CPD recommended		It is understood that a compulsory CPD course would cause significant resistance from key stakeholders. CPD is not compulsory in any European country identified by Grant Thornton.
Optional refresher training course recommended		Based on common practice in other European countries, training providers may develop a refresher training course as an optional commercial activity for the benefit of transport managers.

A photograph of a person's hand plugging a charging cable into the charging port of an electric vehicle. The image is split vertically: the left side has a purple overlay, and the right side shows the car's side mirror and a reflection of the person. The text 'Conclusion and Appendix' is overlaid on the bottom left.

Conclusion and Appendix

Conclusion

Closing Statement

This report was formed by Grant Thornton through a rigorous review of the current state of the Irish TM CPC programme.

The review undertaken by Grant Thornton involved a thorough desktop research process examining the current training manual, exam questions bank and the appropriate national and EU legislation. In addition to the desktop research, Grant Thornton also facilitated a key stakeholder consultation process with both Irish and international stakeholders. A total of 18 consultations were carried out, five of which were international and the remaining 13 were from Ireland.

The qualitative data gathered from the consultation process helped form both the 'European Benchmarking' and 'Thematic Review' chapters of this report. Various themes were extracted from the consultation analysis and presented as sub-headings in the before-mentioned chapters. These themes were analysed in terms of their strengths and weaknesses which assisted Grant Thornton in formulating five models which the DOT could consider.

The five models outlined in the 'Models: Analysis and Appraisal' chapter were assessed by means of feasibility, acceptability and suitability. The assessment of each model highlighted the associated strengths and weaknesses of each of the following thematic headings:

- Syllabus;
- Oversight;
- Training;
- Exam Administration;
- Entry Requirement;
- Continuous/Optional Professional Development; and
- Cost.

Each thematic component which was deemed to be the most feasible, acceptable and suitable was transposed into a final suggested model or sixth model. This sixth model is Grant Thornton's suggestion to the DOT. It is comprised of the most favourable elements from each of the initial five models in terms of their feasibility, acceptability and suitability criteria.

The suggested model includes a new training manual to be provided by the awarding body, either developed by a procured third-party training content provider, or using in-house expertise if available, based on the competencies, knowledge and skills outlined in Part I. of Annex I. of EU 1071.

The minimum standard training requirement would remain unchanged at 100 compulsory hours and an additional element of optional professional development would be introduced. Furthermore, this model recommends both a closed-book and open-book exam format to assess knowledge retention and application in line with European best practice.

Training providers would be permitted to develop their own training content based on the training manual. The training manual would be supplied to all registered students as part of the examination fee in line with current practice. Supplementary training material may also be provided by either the awarding body or a third-party training content provider as an additional commercial activity. The awarding body would be solely responsible for the administration of the TM CPC exam and certification. The suggested model is believed to be a feasible, acceptable and suitable model for the DOT to consider. The model is offered by Grant Thornton as the most appropriate direction for the TM CPC programme.

Appendix

Acknowledgements

Grant Thornton would like to thank the DOT for their active support and engagement throughout this review. Additionally, Grant Thornton would like to acknowledge and thank all key stakeholders, both Irish and International, who took part in the consultation process. A special thanks to CILT, who provided various documents to assist Grant Thornton in the creation of this report.

Desktop research also played a strong role in acquiring the knowledge to develop this report. A list of the documents used as part of the desk research are included in the following:

- CILT TM CPC Competency Framework
- CILT TM CPC Gap Analysis
- CILT TM CPC Funding Proposal October 2020
- CILT TM CPC New Training Manual Business Case
- CILT TM CPC PowerPoint Presentation 2020
- CILT TM CPC PowerPoint Presentation 2022
- EU-UK Trade and Cooperation Agreement¹⁾
- June 2021 Road Haulage Exam Paper 1
- June 2021 Road Haulage Exam Paper 2
- June 2021 Passenger Transport Exam Paper 1
- June 2021 Passenger Transport Exam Paper 2
- June 2022 Road Haulage Exam Paper 1
- June 2022 Road Haulage Exam Paper 2
- June 2022 Passenger Transport Exam Paper 1
- June 2022 Passenger Transport Exam Paper 2
- Regulation of European Council No. 1071/2009 of the European Parliament and of the Council of 21 October 2009
- Statutory Instrument No. 460 of 2015
- 'TM CPC Comparison with other EU countries' Excel file supplied by the DOT
- TM CPC Training Manual (2018)
- TM CPC Training Manual Addendum (2022)
- TM CPC Training Provider Application Guidelines
- UK Road Haulage Chief Examiner Report September 2022²⁾

1) https://skillsandeducationgroupawards.co.uk/wp-content/uploads/Qualifications/2208-IA-1_Road_Haulage_Chief_Examiner_Report_September_2022.pdf

2) [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:22021A0430\(01\)&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:22021A0430(01)&from=EN)

Glossary

ADR	Agreement Concerning the International Carriage of Dangerous Goods by Road
CA	Continuous Assessment
CBR	Centraal Bureau Rijvaardigheidsbewijzen
CCEA	Council of Curriculum, Examinations and Assessments
CILT	Chartered Institute of Logistics and Transport
CPC	Certificate of Professional Competence
CPD	Continuous Professional Development
DOT	Department of Transport
EC	European Commission
EU	European Union
EU 1071	Regulation of European Council No. 1071/2009 of the European Parliament and of the Council of 21 October 2009
MCQ	Multiple Choice Questions
NFQ	National Framework of Qualifications
OFQUAL	Office of Qualifications and Examinations Regulation
PDF	Portable Document Format
RTA	Road Transport Authority
S&EG	Skills and Education Group
SME	Subject Matter Expert
STA	Swedish Transport Authority
SWOT	Strengths, Weaknesses, Opportunities and Threats
TM CPC	Transport Manager Certificate of Professional Competence
UK	United Kingdom

