Direct Vision Standard (DVS) Progressive Safe System (PSS) FAQ's

This is a "working document" which will be updated as-and-when issues arise and are clarified with Transport for London.

What is the DVS Progressive Safe System (PSS)?

The DVS progressive Safe System is TfL's upgrade to the existing DVS Safe System,

When does it come into force?

28th October 2024

Does the new PSS apply to my vehicle?

Vehicles over 12t GVW and with a star rating of **Zero**, **One** or **Two** will need to comply with the new PSS requirements from 28th October 2024.

Vehicles with a Star Rating of between **Three** and **Five** are unaffected by the DVS PSS changes. Any Three to Five Star rated vehicle that already holds a valid Safety Permit will retain that permit until its designated end date, and any new applications will not require the submission of additional evidence.

When can I apply for a new PSS permit?

Permits can be applied for, via the TfL website, from 24th June 2024.

Can I install PSS compliant kit before the application process opens in June 2024?

Yes.

Is there a guidance document for the PSS?

Yes. The DVS guidance has been updated and is available at:

TfL: <u>https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/direct-vision-in-heavy-goods-vehicles</u>

What are the PSS requirements?

Progressive Safe System summary from TfL website

Requirement 1: A Camera Monitoring System (CMS) must be fitted to the nearside of the vehicle, to eliminate the remaining blind spot at the nearside. A CMS can also be used as an alternative to fitting Class V and VI mirrors.

Our guidance states that an additional CMS does not need to be fitted where one already exists in the vehicle, or where the vehicle meets the standards set out in UNECE Regulations 151 and 159. This will apply where the same safety benefits are achieved, and may include a CMS fitted to replace mirrors, or as part of a Blind Spot Information System.

We recommend that installers consider where to install cameras based on the size of blind spot that needs to be covered and to avoid causing an external projection that may come into contact with someone adjacent to the vehicle. In many cases, a mounting height above two metres may be appropriate but installers should consider the context of the specific vehicle.

Requirement 2: Class V and VI mirrors, or a CMS that replaces the mirrors, or a combination of both, must be fitted to the front and nearside of the vehicle.

Requirement 3: A Blind Spot Information System must ensure full coverage down the nearside of rigid vehicles to detect vulnerable road users. They must not activate in relation to roadside furniture or stationary vehicles. This aims to prevent left turn collisions.

Requirement 4: A Moving Off Information System (MOIS) must be fitted to the front of a vehicle to warn the driver of the presence of a vulnerable road user and prevent collisions at the front blind spot zone when a vehicle moves off from rest.

Requirement 5: Side under- run protection must be fitted to both sides of the vehicle, except where this would not be practicable.

Requirement 6: Audible warnings must be fitted to provide an adequate warning to vulnerable road users when a vehicle is turning left, or right for left-hand drive vehicles. This makes sure that all vehicles can warn of an intended manoeuvre.

Requirement 7: External warning signage must be displayed on vehicles to provide clear visual warning of the hazards around the vehicle. Our operator's guidance sets out that this must be clearly legible.

We recommend larger (at least A3) size signs where possible, recognising that may not be possible for all vehicle designs. Operators where larger signage is not practical should do what works best for their vehicle, while making sure that signage used is clear and legible.

Are there any equipment specifications?

Yes, there are specifications for the Active Sensor System (BSIS) and Moving Off Information System (MOIS). These can be found at the following links:

TfL: <u>https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/direct-vision-in-heavy-goods-vehicles</u>

How do I find out if the current DVS Safe System on my vehicles is compliant with the new DVS PSS requirement?

Installers of equipment already fitted should be able to provide details of the specifications and functionality of the kit they have fitted. In circumstances where you do not have these details (e.g. the kit installer is no longer in business, the necessary details have been lost), we are seeking clarity from TfL on what you should do.

I already have a Safe System fitted and a current permit, how long does it last?

Any vehicles that currently holds an existing DVS Permit with a Star Rating of **Zero**, **One and Two** will remain compliant until **midnight on 27 October 2024**.

To maintain compliance beyond this date and to be issued with a new DVS PSS Permit, the operators of these vehicles will be required to submit evidence that their vehicles are compliant with the requirements of the new PSS.

Any **Three to Five Star** rated vehicle that already holds a valid Safety Permit will retain that permit until its designated end date which may be October 2030.

My original permit expiry date states that it expires on the 24th October 2024

Note: permit end dates for Zero, One and Two Star vehicles will state 24 October 2024.

No action is required by Operators; the extension to the 27^{th} October 2024 will be implemented in-house by TfL

How do I apply?

You will need to go to the TfL website, check your star rating and apply: https://tfl.gov.uk/modes/driving/dvs-safety-permit-application/

Your HGV safety permit will be issued by email to the applicant email. You will receive a permit reference number in the confirmation email but a physical permit or certificate will not normally be provided.

What evidence of PSS compliance is required?

For applications regarding vehicles rated zero, one or two stars, or where your vehicle is unrated, you will need to submit the following:

Visual evidence: two photographs to demonstrate that you have fitted the PSS to your vehicle:

For the visual evidence, the photographs must clearly show the front and nearside of the HGV in photo one, and the rear and nearside of the vehicle in photo two.

The vehicle registration plates must be clearly readable in both photos and the images must demonstrate that the PSS equipment has been fitted to the vehicle as specified in this guidance and accompanying technical specifications. If your vehicle is a tractor unit, it is not necessary to include a photo of the trailer as well. Where a trailer is present, the rear photo must show the rear nearside of the trailer with the vehicle in situ.

Examples of good photographic evidence are provided online on the TfL DVS website,

Sensor functionality statement: The current guidance from TfL is that a statement self-certifying that all sensors have been fitted in accordance with their technical specifications and are in functional working order is required.

TfL **do not** require operators to provide third-party **certification** for their equipment installed for the purposes of fitting the PSS.

However, operators are required to provide a sensor functionality statement alongside an application for vehicles with a **Zero, One or Two star rating** that demonstrates that the blind spot and moving off information systems have been fitted to comply with the standards set in the technical specifications, and are in functional working order.

This should comprise an official statement or letter from either the fitter or the original equipment manufacturer of the product being installed, to the effect that the sensors fitted to the vehicle are active and fitted in compliance with the approved technical specifications. The letter should include a statement that certifies that 'the blind spot and moving off information systems fitted to this vehicle are fully functional, effective and installed in compliance with the PSS technical specifications'. This statement can be attached to your application along with the required visual evidence.

How can I be assured that the kit installers are installing compliant kit?

We are seeking clarity from TfL on this issue. TfL do not currently accredit or approve DVS Kit or DVS Installers. The RHA continue to ask for this from TfL.

Will the required kit replace or be added to the current DVS kits?

That will depend on what you have already fitted and the system you choose to upgrade to the PSS. In some cases, MOIS and BSIS are an independent addition to the current kit but won't necessarily integrate with the safe system installed previously.

Who is liable if the operator has, in good faith, had kit fitted that the installers say and believe is compliant with PSS and which proves not to be compliant at an enforcement check?

We are seeking clarity from TfL on this issue. As TfL do not currently accredit or approve DVS Kit or DVS Installers, it is difficult for operators to know for certain that the kit providers have interpreted the requirements and specifications correctly.

What happens if I can not get the new PSS installed on my vehicle before the new standard is enforced from 28 October 2024?

TfL have promised a "grace period" of 3 months to allow operators additional time to fit PSScompliant kit if it is not possible to install it before 28 October 2024. The fine detail of how this will work is not yet known - however, we understand that an operator must be be able to show that they have booked an installation slot before TfL will grant an exemption under the grace period.

The RHA will press TfL to provide clarity on how the grace period will work.

Will the grace period be extended?

It is too early to say whether an extension to the grace period will be granted. Such a decision is subject to TfL providing a "market readiness" report by next June 2024. We have made clear to TfL that the timescales for fitting PSS-compliant kit by October 2024 are very challenging, and we will supply TfL with periodic data to inform whether the grace period should be extended.

In the meantime, we advise operators to ensure PSS-compliant kit is on their vehicles as soon as possible.

Can I still apply for a current Safety Permit before the PSS comes into place, if my Zero-Star rated vehicle is fitted with the Safe System?

Yes, Zero Star rated vehicles fitted with a Safe System under current DVS permit rules will be eligible for a Safety Permit up to 27 October 2024. Applications can continue to be submitted online as normal.

Can I still apply for a current DVS Permit if my One to Two Star rated vehicle is not fitted with the PSS?

Yes. **One** and **Two Star** rated vehicles that are not fitted with the PSS will remain eligible for a DVS Permit up to 27 October 2024. Applications can be submitted online as normal and permits will expire on the 27th October 2024. From 28 October 2024 these vehicles will need to be fitted with the PSS to be eligible to apply for a Safety Permit.

Can I apply for a current DVS Permit if my Zero One or Two Star rated vehicle <u>is</u> fitted with the PSS?

Yes. A permit will be issued if the new PSS is fitted. This will expire on the 27th October 2024 when, if not already applied for, a new application must be made under the new guidance.

If I have already fitted the PSS (possibly a year in advance of the new PSS system coming into force) and have a current safety permit, how will I comply

with the TfL requirement for an official declaration by the fitter of the PSS equipment when making the new application for a safety permit?

Fitters may be reluctant to verify that the equipment fitted, possibly a year ago, is still active, in working order and compliant with PSS but may have provided a statement at the time of fitment. This is something the RHA is seeking clarification on from TfL.

How can I check if my vehicle has a DVS safety permit?

TfL is creating a permit checking portal. This is not yet operational but is planned. TfL have confirmed that a single vehicle look up tool will be operational in June 2024 and a multivehicle look up tool will be operational in October 2024.

Are there any plans to make changes to the DVS Zone?

There are no changes planned to the existing zone for Phase 2. The HGV safety permit scheme covers most of Greater London and is in operation 24 hours a day, every day of the year. A zone checker (with postcode and map search tools) can be found on the TfL website. <u>https://tfl.gov.uk/modes/driving/dvs-where-and-when</u>

A simplified map can be found in the TfL Direct Vision Standard Guidance for Operators: <u>https://tfl.gov.uk/modes/driving/dvs-where-and-when</u>

TfL CONTACT/ENQUIRIES

DVS Enquiries: To raise a DVS enquiry go to <u>https://tfl.gov.uk/modes/driving/dvs-contact-us</u> scroll down to "Make An Enquiry" and complete the form there. There is no email address for queries.

DVS Penalty Charge Notices (PCNs): Full details as to how to challenge DVS PCNs can be found on the PCN.

Road User Charging Contact Centre: The Contact Centre is open Monday to Friday, 08:00-20:00. The relevant numbers are as follows:

UK: 0343 222 2222 (TL call charges)

International: +44 (0)343 222 2222

Textphone: 020 7649 9123

Do not use the DVS Operations Mailbox! - The DVS Operations mailbox is not intended for general email enquiries and is used solely for the administration of pending DVS Multi Permit Applications (MPAs) that have previously been made via our website. TfL will have specifically advised if an Operator needs to send something to this mailbox. Queries sent to this mailbox about any other matters, including queries about DVS PCNs, **will not be responded to**. An auto message is generated to the email sender every time an email is sent to the mailbox which clearly outlines this point and the correct contact channels.