

Final Stage De-Minimis Assessment

Title: Lowering minimum age to be a train driver from 20 to 18 in Great Britain

Type of measure: Secondary Legislation

Department or agency: Department for Transport

BRU sign-off number: DfTDMA406d

RPC reference number: N/A

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1. Summary of proposal

The Train Driving Licences and Certificates (Amendment) Regulations 2026 (the 2026 Regulations) lower the minimum age at which an individual can be issued a train driving licence and certificate from 20 to 18. The train driving licence is issued by the Office of Rail and Road (ORR), the rail safety regulator and licensing authority for train driving in Great Britain, whilst train driving certificates are issued by the employer e.g. train and freight operators. These requirements are set out in the Train Driving Licences and Certificates Regulations 2010 (the 2010 Regulations), which provide the legal framework for licensing and certifying train drivers operating on the mainline railway in Great Britain.

This change in law applies to the mainline railway network in England, Wales, and Scotland. It does not extend to Northern Ireland, where train driving regulation is devolved, nor to international services through the Channel Tunnel, where the minimum age to drive trains is 20 years. This is in accordance with legal obligations made in a **bilateral agreement between the UK and France** concerning recognition of train driving licences and complementary certificates for cross-border rail services through the Channel Tunnel¹.

¹ [Agreement between the Government of the United Kingdom of Great Britain and Northern Ireland and the Government of the French Republic concerning Train Driving Licences and Complementary Certificates in respect of Rail Transport through the Channel Fixed Link](#)

The 2026 Regulations amend the 2010 Regulations, which originally implemented Directive 2007/59/EC concerning the certification of train drivers (“the Train Driving Directive”). While the Train Driving Directive set a general minimum age of 20 across the EU, it allowed member states to issue licences to persons from the age of 18 in their own country provided they were only operating domestic services. The UK adopted the age of 20 in its original transposition, consistent with industry standards at the time.

Case for Change

The change in policy for the domestic railway in Great Britain follows the findings of the second statutory post-implementation review of the 2010 Regulations, published on 5 July 2023. The purpose of this review, which was required under Regulation 40 of the 2010 Regulations, was to evaluate whether the 2010 Regulations were meeting their original policy objectives and identify opportunities for reform. This review identified strong support from the rail industry to lower the minimum age requirement to be a train driver from 20 to 18, recognising that there is a body of evidence supporting the case that lowering the age is feasible and could be effectively implemented. This is based on international examples where a lower age limit of 18 has already been adopted, including France, Germany, the Netherlands and Australia. In 2019, the Rail Delivery Group Train Driver Academy commissioned the Rail Safety and Standards Board (RSSB) to undertake a review of the evidence and consider the feasibility of lowering the minimum age of train drivers in Great Britain from 20 to 18.

On 16 February 2024, RSSB published its findings, which concluded that there was no clear evidence that younger train drivers aged 18 or 19 pose a higher safety risk than older drivers. This is on the premise, drawn from international case studies, that younger train drivers are given the same level of training, assessment and supervision as older drivers, to enable them to meet the required competence and fitness standards. The research also confirmed that the skills and experience needed to drive trains safely can be provided to younger people through structured training, mentoring and supervision procedures, consistent with the systems that apply to train drivers of all ages. Based on the evidence collected from other countries, RSSB concluded that experience, not age, was more important in determining performance. The report recommended that lowering the minimum age to become a train driver could also support the industry’s goal of building a younger, more diverse workforce that is more representative of the communities they serve, whilst creating new career pathways from school into entry level train driving roles and apprenticeships.

RSSB’s report also highlighted a case for lowering the minimum age to address wider workforce challenges facing the rail industry due to the ageing profile of train drivers, a point also made by several stakeholders in the post implementation review. According to the National Skills Academy for Rail’s (NSAR) 2025 workforce survey, there are approximately 24,000 licensed train drivers in Great Britain². The average of a train driver is 47 and fewer than 3% of train drivers are under the age of 30. Moreover, NSAR reported that 25% of train drivers will reach retirement age by 2030 (using 62 as the assumed retirement age for train drivers), which could lead to a shortfall of approximately 2,500 train drivers in the industry by 2030. The workforce also lacks diversity; women make up less than 11% of the workforce and only 12.4% are ethnic minorities. This suggests more could be done to attract people from underrepresented backgrounds into the profession. Overall, the rail industry is concerned that without action, the industry will face a significant shortage of qualified train drivers in the future.

The current minimum age threshold of 20 limits the rail industry’s ability to offer train driving as a career opportunity to school leavers, as most will have chosen alternative educational or employment opportunities by the age of 20. By lowering the minimum age from 20 to 18, industry can offer opportunities to school leavers directly (as they are required to stay in education, training

² [Findings from the 2025 Workforce Survey - NSAR](#)

or a vocation between 16 and 18), opening the profession to a broader and more diverse talent pool. This could help increase the number of qualified train drivers and improve the representation of women and other groups within the profession, when combined with investment by the industry in training opportunities, recruitment and infrastructure.

In response to the RSSB's report and widespread support from industry for changes to the minimum age limit, the previous Conservative Government launched a public consultation in May 2024 on a proposal to reduce the minimum age limit from 20 to 18. The consultation received strong support from the rail industry, including train and freight operating companies, industry bodies, and trade unions. On 7 May 2025, the Government published the outcome of the consultation and confirmed that it would be proceeding with plans to change the law.

To inform a timetable for changing the law, the Minister of State for Transport, Lord Peter Hendy CBE, commissioned the rail industry to prepare a coordinated plan, outlining a set of specific measures against a timeline to support delivery and set a clear timetable for change management, effective integration of new train drivers and ensuring that levels of safety, competence and performance are maintained. The industry was asked to submit the plan to the Department and ORR on 7 August to be reviewed against the criteria set out in the letter. In response to Lord Hendy's letter, the Rail Delivery Group (RDG) volunteered to lead the industry response and coordinate an implementation plan working across train and freight operators in the industry. This was delegated to the Train Driving Academy (TDA), a specialist programme set up in 2019 by the RDG to improve how train drivers are recruited, trained, and supported. The TDA is a virtual online platform providing training resources, recruitment information and guidance for the benefit of existing and prospective train drivers and employers.

Industry Implementation Plan

The plan sets out how operators will prepare for the change, what adjustments must be in place on the very first day of implementation, and how guidance and communications will support a consistent approach across the industry.

The main details of the plan are as follows:

- The implementation plan establishes actions that should be in place on the very first day of implementation to support effective implementation. The plan also identifies opportunities to optimise existing processes across all age cohorts of train drivers in the long term.
- On day one, the industry determined that no significant changes are required to existing training, assessment and supervision processes for 18 and 19 year olds to become qualify and be successful train drivers. The plan did, however, recommend that in advance of the law changing, operators should ensure existing safeguards are reviewed and are clearly in place to ensure prospective 18 and 19 year olds can apply successfully into train driving roles and are aware of the responsibilities placed on them. Similarly, existing human resources and operational staff need to be made aware of the change and make necessary preparations. This includes formally acknowledging the new minimum age in written procedures and to raise awareness of the change, particularly through a comprehensive communications plan internally and externally of organisations.
- The implementation plan states that operators will be expected to have revised safeguarding policies to cover younger employees, including protections against drugs and alcohol misuse. They will also be expected to provide materials that raise awareness of generational differences and workplace tolerance, helping staff adapt to younger recruits. Training material and resources will also be made available to support prospective applicants and new trainees. To deliver this, the Train Drivers Academy (TDA) will launch a recruitment portal as the central hub for attracting younger drivers, with clear resources on essential

skills and the realities of the role. Candidates will receive guidance on using examples from education, volunteering, or hobbies, so they are not disadvantaged compared to older applicants. Line managers will be supported with a strengths-based interview question bank, and templates will help operators update standards and procedures to formally accept younger applicants.

- In parallel, the Government and industry will be launching a comprehensive communications plan designed to raise awareness of the change in age, highlight the benefits of recruiting younger drivers, and reassure stakeholders that existing processes are sufficient to ensure safety, competence and performance levels are maintained with younger train drivers. Evidence based materials and good practice examples will give operators confidence, while the Department for Transport (DfT) and ORR will encourage engagement from all operators, including those outside RDG membership, to ensure a unified industry response.
- Finally, the implementation plan recommends that a longitudinal study is undertaken to collect data and monitor the experiences of young train driving cohorts. This information will be used to build knowledge and collect lessons to feedback improvements to the system.

2. Strategic case for proposed regulation

1. What is the problem under consideration?

The rail industry faces a significant workforce challenge: an ageing train driver population, limited diversity, and barriers to entry for younger candidates. The current minimum age of 20 prevents school leavers from pursuing train driving roles or apprenticeships directly, meaning the industry is unable to capture or appeal to this pool of potential recruits. Meanwhile, a significant number of train drivers are reaching retirement age (60 to 65) and are projected to leave the industry. The National Skills Academy for Rail (NSAR) report that 25% of train drivers will reach retirement age by 2030 (using 62 as the assumed retirement age for train drivers), which they believe could lead to a shortfall of approximately 2,500 train drivers by 2030.

The industry recognises it must grow training capacity to meet demand and widen the applicant pool. The research prepared by the Rail Safety and Standards Board (RSSB) indicates there are no significant safety issues arising from a lower minimum age of 18, provided existing systems and rigorous standards are applied³, and that removing this age barrier to a career in train driving could be part of the solution for addressing the projected shortages in train drivers.

2. What evidence is there to support the problem statement?

- **Demographic pressures:** 25% of train drivers are projected to retire by 2030. The average age is 47, with only 3% under 30.
- **Diversity gaps:** Women make up less than 11% of the workforce and only 12.4% are ethnic minorities.
- **Recruitment constraints:** The age threshold excludes 18–19-year-olds from entering the profession, limiting access to apprenticeships and early career pathways.
- **Industry support:** The RSSB's 2024 research found no safety disadvantage for younger drivers, provided training standards are met.
- **Regional disparities:** The projected shortages vary by region, with certain routes more vulnerable to impact due to having relatively older workforce demographics, such as Wales,

³ [Minimum age of train drivers](#)

Scotland, the North East and West Midlands. Table 1 below shows the percentage of train drivers over the age of 55 in each region:

Table 1: Percentage of train drivers over 55 by region (Source: NSAR Annual Workforce Survey 2025).

Region	% Over 55
Wales	38.7%
Scotland	32.6%
North East	32.4%
West Midlands	30.2%
South East	28.2%
South West	27.0%
North West	26.4%
East of England	26.2%
East Midlands	26.0%
London	23.5%
Yorkshire and The Humber	23.3%

3. Why is government action or intervention necessary?

The age requirement is embedded in the 2010 Regulations, so only government-led legislative change can lower the threshold. Intervention is needed to:

- Align policy with workforce needs.
- Enable earlier entry into the profession.
- Support long-term service resilience and diversity goals.

4. Has an intervention been attempted in this area previously?

Yes. In 2009, the UK consulted on transposing the EU Train Driving Directive into domestic law but was not asked for their views on lowering the minimum age at that time, so the UK adopted the EU's default minimum age of 20. This is the first major deviation in this policy since then.

5. What market failures currently exist that regulation would resolve?

- **Labour supply constraints:** The current age limit restricts the talent pool and delays entry into skilled roles.
- **Perception:** Misconceptions about younger drivers' capabilities persist despite evidence to the contrary.
- **Underutilisation of training infrastructure:** Apprenticeship and vocational pathways are underused due to age restrictions.

6. What gaps or harms would occur if government doesn't intervene?

- **Missed opportunities:** Young people may pursue other careers, reducing interest in rail professions.
- **Reduced diversity:** The industry may continue to lack representation from younger and underrepresented groups.
- **Recruitment shortfalls:** The workforce is projected to shrink due to a significant number of train drivers reaching retirement age in the next five years. Without action to replace these train drivers, whether it be from the age of 18 or over 20, there is a risk operators will find it more challenging to deliver services.

7. Have there been any similar policy problems requiring regulation, domestically or internationally?

Yes. Other countries (France, Germany, Netherlands, Australia) have successfully lowered the minimum age to 18, demonstrating its feasibility and safety. These examples informed the UK's policy shift.

8. Has a post-implementation review of the existing regulation been undertaken?

Yes. The second statutory post-implementation review of the 2010 Regulations was published in July 2023. It found strong industry support in principle for lowering the age and cited international evidence and domestic feasibility as reasons for exploring the change. The RSSB's 2024 report reinforced this, showing no increased safety risk for younger drivers and recommending structured training and mentoring. The case in favour was confirmed in a full public consultation on the policy undertaken in May and June 2025. The findings published in May 2025⁴ found 92% of rail industry bodies, organisations, trade unions, train and freight operators were in support of changing the law. There was also strong support from members of the public, with 78% of respondents identifying as members of the public supporting a change in law.

3. SMART objectives for intervention

The primary policy objective is to **lower the minimum age for train driver licensing from 20 to 18** in Great Britain. The intended effect is to **expand access to train driving roles**, particularly for younger individuals, thereby addressing workforce shortages, improving diversity, and supporting long-term operational resilience in the rail sector.

This intervention aims to:

- Remove age-based barriers to entry for school leavers.
- Enable earlier access to vocational training and apprenticeships.
- Support industry efforts to recruit and retain a sustainable workforce.

Using the Green Book SMART framework, the intended objectives include:

- **Increased availability** of train driver roles advertised from the age of 18 in the industry across train and freight operators.
- **Improved workforce diversity**, including age and gender representation.
- **Enhanced long-term workforce planning** to mitigate projected retirements and workforce attrition.
- **Greater uptake of vocational pathways**, such as Level 3 apprenticeships.

⁴ [Lowering the minimum age requirement for train drivers from 20 to 18 – outcome - GOV.UK](#)

Specific Objective	Measurability	Achievability	Realistic	Timeframe
1. Increased availability of train driver roles advertised from the age of 18 in the industry across train and freight operators.	1. Increase in advertised job roles from 18.	1. The change in law will make this possible on day one. Provided operators update their platforms and recruitment criteria, this is highly achievable.	1. There is broad industry support for this policy. We expect industry will embrace the opportunities enabled by the change in law, which should result in a significant opening of available opportunities for train driver positions from 18.	One legislation has been implemented, there will be a formal review of the 2010 Regulations (as amended) within five years as required under Regulation 40 of the 2010 Regulations.
2. Improved workforce diversity , including age and gender representation.	2. Increase in % terms in female, BAME representation and in numbers of train drivers in the age group 18-24. Establish the current % of female, BAME, and 18–24 train drivers and calculate changes over time.	2. This will require operators to attract candidates from these groups, so actively incentivising and supporting prospective train drivers from these groups will be essential to its success. The industry implementation plan has stressed a high importance on inclusivity, support networks and community outreach to make train driving an attractive career that can appeal to these unrepresented groups. This is moderately achievable.	2. This is a realistic prospect. UK train operators are already actively working to diversify the train driving workforce by targeting underrepresented groups, especially women and younger people. They are introducing inclusive recruitment campaigns, expanding apprenticeships, and partnering with initiatives like <i>Women in Rail</i> and the <i>Equality, Diversity & Inclusion Charter</i> to challenge stereotypes and promote rail careers more widely. Operators are also running leadership development programmes, improving flexible working options, and embedding equity and inclusion strategies to make train driving more accessible and appealing to a broader talent pool.	

<p>3. Enhanced long-term workforce planning to mitigate projected retirements and workforce attrition.</p>	<p>3. Measurable over a period of years: An increase in the availability of train drivers reducing the dependence on overtime and rest-day working. There should be a reduction in cancellations due to a lack of train drivers. Gather data on overtime hours, rest-day reliance, and cancellations due to staff shortages.</p>	<p>3. Lowering the minimum age can increase the pool of train drivers in the industry, but addressing workforce gaps and supporting planning will require a strategy to coordinate and plug gaps where they exist on the network to reduce the likelihood of cancellations. A secure pipeline of train drivers can form part of this solution, but this requires steady investment and outreach.</p>	<p>3. This is realistic, but only if it is paired with strong recruitment and retention measures. The industry faces a significant retirement wave, with the average driver age close to 50, so opening the profession to 18-year-olds expands the talent pool and creates a pipeline of younger recruits. This measure therefore supports the government's objective of giving industry the workforce it requires to keep transportation and services running, supporting economic growth and productivity.</p>	
<p>4. Greater uptake of vocational pathways, such as Level 3 apprenticeships.</p>	<p>4. Increase in the availability and uptake of the Train Driving Level 3 apprenticeship. Identify current enrolment numbers and completion rates for Level 3 and measure this over time.</p>	<p>4. This is possible from day one the law is changed. To keep apprentices engaged, the programme must deliver strong success rates, showcase inspiring role models, expand outreach, ensure accessible opportunities, and secure long-term employer backing</p>	<p>4. This is a realistic prospect as the Train Driving Level 3 apprenticeship is a popular scheme which will be promoted as part of the change in law. This measure supports the government's objective of increasing the number of apprenticeships and vocations by 50k between 2026 and 2029.</p>	

The key critical success factors for this intervention include:

- **Stakeholder coordination:** Effective collaboration between the Department for Transport, ORR, Rail Delivery Group, trade unions, and train operators.
- **Training infrastructure:** Availability of high-quality vocational training and mentoring for younger drivers.
- **Operational safety:** Maintenance of rigorous medical, psychological, and competence standards.
- **Public and workforce confidence:** Addressing concerns about maturity and readiness through structured supervision and support.
- **Monitoring and evaluation:** Ongoing data collection and performance review to assess impact and inform future policy.

This intervention aligns with several UK Government strategic priorities:

- **Economic growth:** Expanding access to skilled employment supports productivity and regional development.
- **Skills and education:** Enhances vocational pathways and apprenticeships for young people.
- **Decarbonisation:** Strengthens the rail sector, a low-carbon transport mode, by ensuring service continuity and resilience.
- **Levelling up:** Opens career opportunities to a broader demographic, including underrepresented groups and regions.

4. Description of proposed intervention options and explanation of the logical change process whereby this achieves SMART objectives

The long-listing appraisal began with a broad set of potential policy responses to address the workforce challenges in the rail industry, particularly the ageing demographic of train drivers and limited access for younger candidates. The long list was developed using the Green Book's Options Framework Filter (OFF), which incorporates SMART objectives and Critical Success Factors (CSFs) to assess feasibility, effectiveness, and alignment with strategic goals.

The initial long list included:

1. **Maintain the status quo** (no change to minimum age).
2. **Lower the minimum age to 18** for domestic train driving licences.
3. **Introduce a phased reduction** (e.g., lower to 19 initially, then to 18 after further review).
4. **Allow pilot schemes only** for 18–19-year-olds in selected regions or operators.
5. **Lower the age but require enhanced supervision** for a fixed period.
6. **Introduce non-legislative measures** such as outreach, mentoring, or training expansion without changing the age threshold.

Each option was assessed against SMART objectives (e.g., increasing access to train driving roles, improving diversity, supporting workforce sustainability) and CSFs (e.g., safety assurance, stakeholder support, legal feasibility, cost-effectiveness).

Following appraisal, options 2 and 5 were shortlisted for further analysis. Option 2 was ultimately selected as the preferred option due to its simplicity, alignment with international practice, and strong support from industry stakeholders. Option 5 was considered duplicative, as existing supervision and mentoring frameworks already provide robust oversight, which was confirmed by the RSSB research.

Alternatives Considered and Why They Were Discarded

- **Status quo:** Discarded due to inability to address workforce shortages or improve access for younger candidates.
- **Phased reduction:** Rejected for complexity and lack of clear added value over a direct reduction.
- **Pilot schemes:** Discarded due to limited scalability and potential inconsistency across regions.
- **Enhanced supervision requirement:** Not pursued as a standalone option because existing systems already provide high levels of supervision; additional mandates were deemed unnecessary.
- **Non-legislative measures only:** Considered insufficient to remove the legal barrier posed by the age threshold.

Small and Micro Business Assessment (SaMBA)

The policy was assessed for its impact on small and micro businesses. The rail industry is dominated by large operators and infrastructure providers, and the licensing and certification process is managed centrally by the ORR and rail operating companies. As such:

- There are no small and micro businesses that would be impacted by this change.
- The policy does not impose direct compliance costs or administrative burdens on small entities.
- No evidence was found of small or micro businesses being involved in train driver licensing or certification.

Medium-Sized Business Assessment (49–500 employees)

Medium-sized businesses were considered in scope where relevant, particularly in relation to:

- **Training providers and vocational institutions** involved in delivering Level 3 qualifications and apprenticeships.
- **Freight operators** with smaller workforce sizes.

The impact on these businesses is expected to be minimal and manageable:

- The policy may increase demand for training services, which could be commercially beneficial.
- No significant regulatory or cost burdens are imposed. Familiarisation costs are likely to be neutral and offset and exceed by long term operational benefits from a larger workforce.

Use of the Green Book’s Options Framework Filter (OFF)

The OFF was applied to develop and refine the long list using SMART objectives and CSFs:

Filter Criteria	Application to Long-List Options
Strategic alignment	Options were assessed for alignment with workforce planning, diversity, and transport sector resilience.

Measurability	Each option was evaluated for its ability to deliver measurable outcomes (e.g., increased recruitment of 18–19-year-olds).
Achievability	Legal feasibility and operational readiness were considered, including existing training infrastructure.
Realism	Options were tested against stakeholder feedback and industry capacity to implement changes.
Time-bound impact	Options were assessed for their ability to deliver results within a defined implementation window.
Critical Success Factors	Safety assurance, stakeholder support, and cost-effectiveness were used to filter viable options.

5. Summary of long-list and alternatives

The policy appraisal process began with a long list of potential interventions to address the age threshold for train driver licensing. These options were assessed using the Green Book’s Options Framework Filter (OFF), which applies SMART objectives and Critical Success Factors (CSFs) to evaluate feasibility, effectiveness, and strategic alignment. Four options were shortlisted for detailed consideration:

Option 1: Maintain the Status Quo (Minimum Age Remains 20)

- OFF Assessment:
 - - *Specific*: No change to current policy.
 - *Measurable*: No improvement in recruitment or diversity.
 - *Achievable*: Fully achievable, but not responsive to workforce challenges.
 - *Realistic*: Operationally stable, but strategically misaligned.
 - *Time-bound*: No time-limited benefits.
- CSFs: Meets safety and legal continuity but fails to address stakeholder coordination, workforce planning, or diversity goals.
- Outcome: Retained as a baseline for comparison but not preferred due to lack of responsiveness to policy objectives.

Option 2: Lower the Minimum Age to 18 (Preferred Option)

- OFF Assessment:
 - *Specific*: Amend regulations to reduce minimum age from 20 to 18.
 - *Measurable*: Applications from 18–19-year-olds within two years.
 - *Achievable*: Supported by existing training infrastructure and legal powers.
 - *Realistic*: Backed by RSSB research and international precedent.
 - *Time-bound*: Upon implementation, reviewed within five years.

- CSFs: Strong alignment with stakeholder support, safety assurance, cost-effectiveness, and long-term workforce planning.
- Outcome: Selected as the preferred option due to its direct impact, feasibility, and strategic alignment.

Option 4: Pilot Schemes for 18–19-Year-Olds in Selected Regions

- OFF Assessment:
 - *Specific*: Limited trials without national rollout.
 - *Measurable*: Difficult to scale or compare outcomes nationally.
 - *Achievable*: Operationally feasible but administratively complex.
 - *Realistic*: May delay broader reform and create regional inequities.
 - *Time-bound*: Uncertain timeline for expansion.
- CSFs: Partial alignment with safety and stakeholder coordination, but weak on scalability and consistency.
- Outcome: Discarded due to limited reach and inability to deliver national impact within the required timeframe.

Option 5: Lower Age to 18 with Mandatory Enhanced Supervision

- OFF Assessment:
 - *Specific*: Age reduction with added supervision mandate.
 - *Measurable*: Adds complexity to performance tracking.
 - *Achievable*: Operationally possible but duplicative.
 - *Realistic*: Industry feedback suggests existing supervision is sufficient.
 - *Time-bound*: Adds implementation burden without clear added value, because research has concluded that there is no safety reason why train drivers cannot be recruited from the age of 18 using existing rigorous training, assessment and supervision requirements⁵.
- CSFs: Mixed stakeholder support; supervision already embedded in current practice.
- Outcome: Discarded due to redundancy and lack of proportional benefit.

SaMBA and Medium-Sized Business Impact

Small and Micro Businesses

- Impact Assessment: The preferred option (Option 2) does not have a high impact on small or micro businesses. Licensing and certification are managed by large operators and regulatory bodies. Small entities are not typically involved in train driver recruitment or licensing.
- Conclusion: Small and micro businesses are not in scope for direct regulatory impact.

Medium-Sized Businesses (50–499 employees)

- Impact Assessment: Medium-sized businesses may be affected indirectly, particularly those involved in:
 - Vocational training delivery

⁵ RSSB project exploring reducing the minimum age of GB train drivers to 18: [Minimum age of train drivers](#)

- Freight operations with smaller workforce sizes
- Conclusion: The impact is not disproportionate and may be commercially beneficial due to increased demand for training services.

SaMBA and Medium-Sized Business Mitigations

- Small and Micro Businesses: No mitigations required, as they are not anticipated to be impacted.
- Medium-Sized Businesses: No specific mitigations are necessary. The Department will continue to engage with training providers and freight operators to ensure readiness and capacity to support younger applicants.

6. Description of shortlisted policy options carried forward

Following analysis of the evidence drawn from the research and consultation responses, the Department for Transport shortlisted two policy options:

1. Option 2 (Preferred Option): Lower the minimum age from 20 to 18

The preferred option is to amend the Train Driving Licences and Certificates Regulations 2010 to lower the minimum age for issuing a train driving licence from 20 to 18. This change allows individuals aged 18 and 19 to be issued train driving licences enabling them to drive trains on the mainline railway in Great Britain, provided they meet all existing eligibility requirements. These include completion of at least nine years of education, successful completion of vocational training equivalent to Level 3 qualifications (e.g. equivalent to A-Level), and passing medical, psychological, and professional competence assessments. The requirement to hold a train driving certificate issued by an employer remains unchanged.

This option directly supports the policy's SMART objectives. It is specific in its aim to remove the legal age barrier to entry into the train driving profession. It is measurable through expected increases in applications and recruitment from the 18–19 age group. It is achievable within the current regulatory and operational framework, as the licensing and training systems are already in place. The approach is realistic, supported by evidence from the RSSB, which found no increased safety risk from younger drivers who meet the required standards. It is also time-bound, as the change is designed to address workforce challenges projected over the coming years, particularly the anticipated retirement of a significant portion of the current train driver population.

This intervention aligns with critical success factors identified in the Green Book. It has strong stakeholder support, particularly from industry bodies, trade unions, and the public. It maintains safety assurance by upholding all existing training and certification standards. It leverages existing training infrastructure and does not require the creation of new systems. It also supports public confidence by responding to consultation feedback and demonstrating that the change is evidence-based and operationally sound.

2. Option 5: Lower the minimum age from 20 to 18 with a mandatory period of enhanced supervision.

This alternative was considered to account for concerns raised during the consultation by train drivers and industry professions on the maturity and readiness of younger drivers. However, this was not chosen based on the counterarguments and evidence gathered by the RSSB research and case submitted by Industry stakeholders, including train operators and trade unions, which justified that current supervision and mentoring practices are already robust and sufficient. Adding a

regulatory requirement for enhanced supervision was seen as duplicative and unnecessarily burdensome, whilst treating younger candidates in a more discriminatory manner than older candidates, which would be counterproductive. It would have introduced additional administrative complexity and costs without delivering clear additional benefits, and it lacked strong support from those responsible for implementation. We noted this is contrary to the government’s objective to reduce administrative burdens for businesses by 25% within this parliament, as set out in the government’s *Plan for Change*⁶.

Option 2 was therefore selected as the preferred approach because it achieves the policy objectives more directly and efficiently. It removes a key barrier to entry, supports workforce renewal, and aligns with international best practice. It also avoids unnecessary regulatory overhead while maintaining high safety and training standards.

In terms of business impact, the preferred option does not impose adverse effects on small, medium, or micro businesses. Small and micro businesses are not typically involved in train driver licensing or certification, which is managed by large train operating companies and the Office of Rail and Road. As such, they are not in scope for direct regulatory impact. Medium-sized businesses, such as vocational training providers or smaller freight operators, may experience some indirect effects. However, these are expected to be neutral or positive, as the policy may increase demand for training services and expand the pool of potential recruits. No disproportionate impacts have been identified, and no specific mitigations are required. The Department will continue to engage with relevant stakeholders to ensure readiness and support smooth implementation.

7. Regulatory scorecard for preferred option

Part A: Overall and stakeholder impacts

(1) Overall impacts on total welfare		Directional rating
Description of overall business impact	The regulation to lower the minimum train driver licensing age from 20 to 18 is expected to have a positive impact on social welfare, primarily through improved workforce sustainability and increased access to skilled employment for younger individuals. It addresses demographic challenges in the rail sector, including an ageing workforce and limited diversity, by enabling school leavers to enter the profession earlier. This supports long-term service resilience, enhances vocational training uptake, and contributes to broader government goals such as levelling up and economic growth. The impact is driven by benefits to young people, training providers, and the rail industry, rather than households or businesses directly.	Positive
Monetised impacts	Total £ NPSV (Net Present Social Value): Not quantified The regulatory scorecard and options assessment do not provide a monetised NPSV figure. The intervention is assessed as neutral in terms of direct financial costs or benefits. Significant monetised costs/benefits not covered elsewhere: None identified. The policy leverages existing	Neutral.

⁶ [Radical action plan to cut red tape and kickstart growth - GOV.UK](https://www.gov.uk/government/consultations/radical-action-plan-to-cut-red-tape-and-kickstart-growth)

	infrastructure and does not impose new compliance costs.	
Non-monetised impacts	<p>Significant non-monetised benefits:</p> <ul style="list-style-type: none"> • Increased recruitment of 18–19-year-olds into train driving roles. • Improved diversity in the workforce, particularly age and gender representation. • Enhanced uptake of apprenticeships and vocational pathways and potentially a reduction in operating costs due to relatively lower apprenticeship salaries compared to full time salaries (time-limited at apprenticeship progresses to full time licensed train driver). • Strengthened long-term workforce planning and operational resilience. • Positive reputational effects for operators engaging with younger candidates. <p>Significant non-monetised costs:</p> <ul style="list-style-type: none"> • Minor adjustments to operators safeguarding policies and recruitment systems. • Need for operators to increase awareness and training for line managers on generational difference, the welfare of younger train drivers and advertising train driver positions in schools and elsewhere. • Increase in licence applications that will need to be processed by ORR. These costs are currently covered by the safety levy that operators pay into. The system has been modernised with a new digital licensing platform to reduce administrative burdens on ORR, but an increase flow could result in more work at an administrative level. Similarly, operators will need to handle an increase in applications for train driving certificates parallel to an increase in licence applications to ORR, but these are expected to be minimal and absorbed by existing HR and administration budgets. 	Neutral.
Any significant or adverse distributional impacts?	<p>The policy does not impose adverse distributional impacts. It is neutral across business sizes and consumer groups.</p> <p>Small and micro businesses are not affected, as train driver licensing is managed by large operators. Medium-sized businesses (e.g., training providers) may benefit from increased demand for services.</p>	Neutral.

	Public Sector Equality Duty (PSED) considerations: The policy supports equality by removing age-based barriers and promoting access for underrepresented groups, including women and young people.	
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(2) Expected impacts on businesses		
Description of overall business impact	Lowering the minimum age for train driver licensing from 20 to 18 is expected to have a neutral overall impact on businesses, while offering strategic benefits to the rail industry. The change addresses workforce challenges such as an ageing driver population and limited diversity, enabling earlier entry into the profession and expanding access to apprenticeships and vocational pathways. Industry stakeholders, including the Rail Delivery Group (RDG), support the change and have developed implementation plans to ensure readiness, including safeguarding policies and recruitment optimisations. The intervention is not expected to disrupt existing operations or impose new regulatory burdens, and it aligns with international best practices and domestic workforce planning goals.	Neutral.
Monetised impacts	There are no monetised impacts identified in the regulatory scorecard or supporting documents. The policy is assessed as neutral in terms of direct financial costs or benefits to businesses. No net present social value, public sector financial costs, or quantifiable business impacts were calculated, reflecting the minimal regulatory burden and the use of existing infrastructure and processes.	Neutral.
Non-monetised impacts	Non-monetised impacts are also assessed as neutral, though the intervention is expected to yield positive strategic outcomes. These include increased recruitment of younger drivers, improved workforce diversity, and enhanced long-term resilience in rail operations. The RDG response highlights optimisation workstreams such as psychometric assessment improvements, safeguarding enhancements, and tailored recruitment guidance, which support younger candidates without requiring major systemic changes.	Neutral.
Any significant or adverse distributional impacts?	No significant or adverse distributional impacts are anticipated. The policy does not affect small or micro businesses, as train driver licensing is managed by large operators and the Office of Rail and Road. Medium-sized businesses, such as vocational training providers or smaller freight operators, may experience indirect positive effects due to increased demand for training services. The RDG notes reputational and legal	Neutral

	risks for operators who fail to engage with the change, but these are mitigated through industry-wide guidance and support.	
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Part B: Impacts on wider government priorities

Category	Description of impact	Directional rating
Business environment: Does the measure impact on the ease of doing business in the UK?	The measure supports the ease of doing business in the UK rail sector by expanding the pool of eligible train driver candidates, helping operators address recruitment bottlenecks and long-term workforce risks. It reduces barriers to entry for younger applicants, enabling earlier access to vocational pathways and apprenticeships. The change is operationally simple, requiring minimal adjustments to existing systems, and is backed by industry consensus and planning.	Supports
International Considerations: Does the measure support international trade and investment?	The measure supports international trade and investment indirectly by aligning UK rail workforce policy with international best practices (e.g., France, Germany, Netherlands). The increased supply of train drivers on the domestic market and accompanying increase in experience and expertise may translate into an improved pool of potential candidates for international rail operators.	Supports
Natural capital and Decarbonisation: Does the measure support commitments to improve the environment and decarbonise?	The regulation does not directly impact environmental commitments or decarbonisation. However, by supporting workforce resilience in the rail sector, a low-carbon transport mode, it may contribute indirectly to maintaining service continuity and modal shift from higher-emission transport options.	Neutral

8. Monitoring and evaluation of preferred option

The government will monitor and evaluate the success of the policy to lower the minimum train driver age through a structured implementation and review framework. This includes a longitudinal study commencing once the law is changed to track outcomes over time, focusing on recruitment trends, performance, and safety data for younger drivers. The Department for Transport, in collaboration with the Office of Rail and Road and industry stakeholders, will oversee data collection and analysis, supported by a dedicated issues log and feedback mechanisms. Pathfinder operators will provide early insights, and the TDA-led working groups will continue to refine guidance and share best practices. A formal review of the regulation’s impact is scheduled within five years, as required under Regulation 40 of the Train Driving Licences and Certificates Regulations.

9. Minimising administrative and compliance costs for preferred option

The government will minimise administrative and compliance costs for the preferred option by integrating the change into existing licensing and training systems without introducing new regulatory burdens. Operators will not need to overhaul their processes, as the adjustment primarily involves updating age parameters and enhancing awareness through guidance and communications. The Rail Delivery Group and Train Driver Academy have developed centralised resources such as the TDA Recruitment Portal and templated materials to support consistent implementation across the industry. These tools reduce duplication and streamline onboarding for younger candidates. Existing supervision and competence frameworks remain in place, avoiding the need for additional mandates or oversight structures.

Declaration

Department:

Department for Transport

Contact details for enquiries:

rail.safety@dft.gov.uk

Minister responsible:

Peter, Lordy Hendy of Richmond Hill, CBE, Minister of State for Rail

I have read De Minimis Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed:



Date:

29/01/2026

Summary: Analysis and evidence

For Options Assessment, it is not a requirement to complete all the below, but please complete as much as you can where possible.

Price base year: N/A

PV base year: N/A

	1. Maintain the Status Quo	2. Lower the Minimum Age to 18 (Preferred Option)	3. Introduce a Phased Reduction (Lower to 19 first, then 18 later)	4. Pilot Schemes for 18–19-Year-Olds in Selected Regions	5. Lower Age to 18 with Mandatory Enhanced Supervision
Net present social value (with brief description, including ranges, of individual costs and benefits)	Neutral – No change, no benefits	Positive (unquantified) – Workforce sustainability, diversity, vocational uptake	Neutral – Delayed benefits, added complexity	Neutral – Limited reach, inconsistent outcomes	Neutral – Adds complexity without clear added value
Public sector financial costs (with brief description, including ranges)	Neutral – No new costs	Neutral – Uses existing systems, minimal admin adjustments	Slightly higher – Two-stage implementation	Higher – Admin burden for regional pilots	Higher – Additional oversight and compliance
Significant un-quantified benefits and costs (description, with scale where possible)	None	Benefits: Increased recruitment of 18–19-year-olds, diversity gains, resilience; Costs: Minor safeguarding adjustments.	Benefits: Same as Option 2 but delayed; Costs: Complexity in rollout	Benefits: Limited evidence from trials; Costs: Regional inequity, admin overhead	Benefits: Marginal safety reassurance; Costs: Duplicative supervision, discriminatory perception

Key risks (and risk costs, and optimism bias, where relevant)	Workforce shortages and limited diversity persist.	Low – Evidence supports safety; mitigated by existing training.	Medium – Delays reform, risk of inconsistency	High – Regional inequities, reputational risk	Medium – Operational burden, stakeholder resistance
Results of sensitivity analysis	Neutral	Neutral	Neutral	Neutral	Neutral