

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. It is divided into three sections:

- *General questions*
- *New vehicles*
- *Vehicles that require retrofitting to meet the new PSS requirement*

Reviewed 25.07.2024

Section1: General questions

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.

Is there a guidance document for the PSS?

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

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

What are the PSS requirements?

Here is the Progressive Safe System summary from the 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.

What about left-hand drive vehicles?

Guidance for these vehicles is on TfL's website here (<https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/direct-vision-in-heavy-goods-vehicles#on-this-page-9>).

It's not necessary for BSIS to be fitted to both sides, but operators may choose to do so if they wish.

For the PSS, they should be fitted appropriately to account for the blind spot on the right-hand side of the vehicle.

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

Any vehicle 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 25th October 2024. What do I do?

Note: permit end dates for Zero, One and Two Star vehicles will state 25 October 2024.

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

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

A single vehicle look up tool is now operational and a multivehicle look up tool will be operational later in 2024. To check your permit status go to:

<https://tfl.gov.uk/modes/driving/dvs-safety-permit-application/vehicle-star-rating> This will update you on the star rating held by TfL and what DVS permits are in place. There is an option to upgrade your permit to PSS.

Can I still apply for a current DVS Safety Permit if my Zero-Star rated vehicle is not fitted with the PSS?

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. 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 still apply for a current DVS Safety Permit (DVS Phase 1) 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.

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. <https://tfl.gov.uk/modes/driving/dvs-where-and-when>

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

TfL CONTACT/ENQUIRIES

DVS Enquiries: To raise a DVS enquiry go to <https://tfl.gov.uk/modes/driving/dvs-contact-us> 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 TfL’s 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.

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Section 2: New vehicles

Do I have to install PSS equipment on new vehicles?

New vehicles that are certified to meet the UNECE 151 and 159 regulations have been deemed by TfL to comply with the new PSS requirements.

How do I notify TfL that I have a new vehicle which is certified to meet UNECE 151 and 159?

The requirements for sensor statements are set out on the website [here](https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/direct-vision-in-heavy-goods-vehicles/apply-for-an-hgv-safety-permit#on-this-page-7) (<https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/direct-vision-in-heavy-goods-vehicles/apply-for-an-hgv-safety-permit#on-this-page-7>), and in the operators guidance in the information requirements.

The visual evidence is as it was when the safety permit scheme first launched, and the sensor statement would generally come from the manufacturer for new GSR-2 type approved vehicles. It should include: VRM; manufacturer; star rating; operator contact details; confirmation that MOIS and BSIS are fitted as part of the vehicle's type approval.

Whilst GSR-2 vehicles will have the BSIS and MOIS factory-fitted, operators should also bear in mind the other components of the PSS if they are not already fitted, including the external warning signage, left hand turn audio warnings etc – these are set out in the DVS operator's guidance or previously in this document under section 1 General Questions.

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Section 3: Vehicles that require retrofitting to meet the new PSS requirement

On which vehicles do I have to install PSS equipment?

If your vehicle is not certified as meeting the new UNECE 151 and 159 regulations and is rated as either zero, one or two-star, then you will need to retrofit kit to the new PSS requirement.

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

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

You will need to check the functionality of the kit against the PSS requirements, BSIS and MOIS specifications at: <https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/direct-vision-in-heavy-goods-vehicles> and the DVS Explainer document.

Following a request by the RHA, TfL's technical advisers (Loughborough University) has produced the DVS Explainer document to help operators understand how PSS kits meeting the new PSS requirements should function. The document can be accessed here: [https://www.rha.uk.net/Portals/0/PolicyCampaigning/RHA_TfL%20DVS-PSS%20Explainer%20for%20operators_v3%20\(1\).pdf?ver=45-UU1_yMFJUm-Vkv_WKWQ%3D%3D](https://www.rha.uk.net/Portals/0/PolicyCampaigning/RHA_TfL%20DVS-PSS%20Explainer%20for%20operators_v3%20(1).pdf?ver=45-UU1_yMFJUm-Vkv_WKWQ%3D%3D)

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.

NB. It is important that customers include the VRM on their sensor functionality statement when uploading it as evidence. Where a fitter/seller has not included this information, it is acceptable for the operator of the vehicle to add the VRM themselves to the statement, including in writing.

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

As TfL do not accredit or approve DVS Kit or DVS Installers, the RHA has asked TfL's technical advisers, Loughborough University, to produce an explainer document:

[https://www.rha.uk.net/Portals/0/PolicyCampaigning/RHA_TfL%20DVS-PSS%20Explainer%20for%20operators_v3%20\(1\).pdf?ver=45-UU1_yMFJUm-Vkv_WKWQ%3D%3D](https://www.rha.uk.net/Portals/0/PolicyCampaigning/RHA_TfL%20DVS-PSS%20Explainer%20for%20operators_v3%20(1).pdf?ver=45-UU1_yMFJUm-Vkv_WKWQ%3D%3D)

This will help operators understand how the PSS kit should function.

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.

My system is constantly giving loud audible warnings. Is this compliant?

During a meeting with TfL and the RHA, a member raised an issue with where the system was constantly alarming to pedestrians moving around on the pavement. TfL confirmed:

As discussed, our view is that the issue you've described is not in compliance with the BSIS technical specifications. Page 3 states: "High-intensity warnings, such as loud audible or other attention-taking warning signals during a driving situation are only justified if the probability for an imminent collision is high."

As such, the equipment should not be giving constant high-intensity alerts.

For more information on the requirement, please see the Explainer document:

[https://www.rha.uk.net/Portals/0/PolicyCampaigning/RHA_TfL%20DVS-PSS%20Explainer%20for%20operators_v3%20\(1\).pdf?ver=45-UU1_yMFJUm-Vkv_WKWQ%3D%3D](https://www.rha.uk.net/Portals/0/PolicyCampaigning/RHA_TfL%20DVS-PSS%20Explainer%20for%20operators_v3%20(1).pdf?ver=45-UU1_yMFJUm-Vkv_WKWQ%3D%3D)

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

Whilst the new PSS will still be implemented on the 28th October 2024, TfL have promised a "grace period" for enforcement for those operators who have applied to use the grace period. After much lobbying, has been extended to 6 months to allow operators additional time to fit PSS-compliant kit if it is not possible to install it before 28 October 2024. An operator must be able to evidence that they have booked an installation slot between the 28th October 2024 and 4th May 2025. Enforcement against those who have successfully applied to the grace period but have not applied for a permit in that time, would begin from 4 May 2025

Enforcement is only paused for those operators who have applied for the grace period and will commence again from the 4th May 2024. Any operator entering London from the 28th October 2024 without a PSS permit and who hasn't applied for the grace period will attract fines for non-compliance.

Receiving the grace period is not automatic. If you wish to apply for it, you will need to make an application for the vehicles you wish to receive the grace period for. You will need a London Road User Charging account to use this service, and provide evidence that you have installation works arranged to fit the PSS but that this is scheduled for after 28 October 2024 and by 4th May 2025.

Acceptable forms of evidence can include written confirmation, appointment bookings or other correspondence to the effect that you have arranged fitting works, or have purchased equipment that can only arrive after 28 October 2024.

The evidence requirements are the same for those fitting the PSS in their own workshops, as for third party works. TfL expect some kind of documentation to confirm that the work is scheduled on the relevant dates.

You can apply for the grace period by logging in to your London Road User Charging account and following the instructions on the DVS enquiry form.

This applies to UK and Non-UK operators.

I see the grace period has been extended from 3 months to 6 months from 28 October 2024. Does that mean I need not do anything until May 2025?

No. The grace period will only be granted by TfL to operators who, before 28 October 2024, can provide evidence that you have installation works arranged to fit the PSS but that is scheduled for after 28 October 2024 and by 4 May 2025.

This means therefore that, between now and 28 October 2024, you must source kit that meets the PSS requirements and make arrangements for it to be installed – ideally before 28 October 2024. However, if installation is not possible before 28 October 2024, then you can apply to TfL for the grace period provided you can show that you have installation works arranged after 28 October 2024 and before 4 May 2025.

Enforcement is only paused for those operators who have applied for the grace period and will commence again from the 4th May 2024. Any operator entering London from the 28th October 2024 without a PSS permit and who hasn't applied for the grace period will attract fines for non-compliance.

I have a safe system permit on my Zero, One or Two Star rated vehicle which is now fitted with the PSS? What do I do?

If you held a safety permit granted under '2019 safe system rules, that permit will remain valid until the expiry date stated, i.e. 27 Oct 2024. If you were to make a fresh application for a safety permit under the new 'Progressive Safe System rules', you would receive the new safety permit and the existing permit would remain valid as above.

However, if you have a Zero star vehicle and have previously given TfL evidence about the safe system, you have the option to “UPGRADE” your permit and to only tell TfL about the new equipment fitted – then the existing permit would effectively lapse as it would be replaced by the ‘upgraded’ PSS permit. There wouldn’t actually be any break in compliance however, as you would have the new PSS permit taking effect.

If you’ve fitted Progressive Safe System measures to your Zero star vehicle, but your current permit is based on your previous Safe System measures, you can upgrade your permit to reflect the change: <https://tfl.gov.uk/modes/driving/dvs-safety-permit-application/vehicle-star-rating>

Does fitting the PSS kit change the star rating of my vehicle?

No. Fitting PSS kit does not change the star rating of your vehicle. So for example, if your vehicle is rated zero-star, then it remains a zero-star rated vehicle regardless of whether you have fitted PSS kit.

Instead TfL policy is that, after 28 October 2024, zero, one or two-star vehicles must have PSS kit installed in order to drive within London.