



**RESPONSE TO THE  
DEPARTMENT FOR TRANSPORT'S CONSULTATION  
"MOTORING SERVICES STRATEGY"**

**5 January 2016**

## Introduction

This is the response of the Royal Society for the Prevention of Accidents (RoSPA) to the Department for Transport’s Consultation, “Motoring Services Strategy”. RoSPA thanks the Department for the opportunity to comment on the proposals. Our response has been produced following consultation with RoSPA’s National Road Safety Committee.

There are around 37 million licensed vehicles and over 45 million licensed drivers in the UK, travelling around 311 billion vehicle miles on our roads each year. The UK’s automotive industry employs 770,000 people and contributes £34 billion in exports to the UK economy.

However, five people are killed every day on Britain’s roads, and although this is a very substantial reduction from ten years ago, the decrease in road casualties is levelling off. The number of people killed and injured on Britain’s roads increased in 2014.

The Department for Transport’s (DfT) three executive agencies, the Driver and Vehicle Licensing Agency, the Driver and Vehicle Standards Agency and the Vehicle Certification Agency play a crucial role in preventing crashes and casualties on our roads.

**The Driver and Vehicle Licensing Agency (DVLA)** maintains registers of drivers in Great Britain and vehicles in the United Kingdom, issues and revokes driving licences, manages and enforces the medical rules for driving and collects Vehicle Excise Duty (VED).

**The Driver and Vehicle Standards Agency (DVSA)** sets standards for driving and motorcycling, conducts driving and motorcycling tests, manages the register of Approved Driving Instructors and driving and motorcycling examiners, and makes sure that drivers, vehicle operators and MOT garages follow roadworthiness standards.

**The Vehicle Certification Agency (VCA)** is the UK’s designated Vehicle Type Approval authority, ensuring vehicles, systems and components comply with internationally agreed safety and environmental standards.

Motoring is changing as automotive technology continues to develop, with the prospect of driverless cars now a real possibility in the foreseeable future. The motoring agencies need to adapt to new trends in both motoring and the way people and businesses operate in an increasingly digitally-driven world.

Therefore, the Government is seeking views on its strategy for:

- improving the user experience
- embedding digital in the way we work
- ensuring our processes are as efficient as possible to support delivery of excellent user service
- transforming the agencies
- making driving easier through deregulation.

## **RoSPA Responses to the Consultation Questions**

### **Question 1**

**As we change the test to ensure it reflects the modern driving experience, what views do respondents have about how we can maintain standards and give candidates clear information about the competencies tested in the driving test?**

### **RoSPA Response**

RoSPA has long been in favour of introducing a minimum learning period, accompanied by some form of logbook, to encourage learners to gain more driving experience during their learning period. As most learners take many months to pass their Test, this would not impose much additional burden on learner drivers.

A mandatory Learner Driver Logbook (in printed, online, Apps, CD, formats) in which the learner records how much and what type of driving they have undertaken would ensure the learning period is used effectively. It would act as a record of driving experience, help structure the learning to reflect the learning to drive syllabus, allow learners to measure their progress and ensure that they gain experience in a wide range of situations. It could encourage lessons and practice in adverse weather and in the dark so learners gain experience in these situations. It could also act as a ‘Test-readiness’ tool.

The learning period should include (where possible) both professional lessons and private practice with a parent or friend. Good communication between the learner, the learner’s parents and the ADI is also important. More should be done to encourage and make it easier for learners to take private practice to support their professional lessons.

Parents need more guidance on helping their children as they learn to drive, and to understand that the example they themselves set as drivers is a significant influence on their children’s driving attitudes and behaviour.

Learner drivers are not a high risk while they are learning under supervision; the risk increases when they can drive unsupervised after passing their Test. The cost of insuring learner drivers who are under supervision should be kept as low as possible by the insurance industry as this would make private practice more affordable for families. This in turn would help learners to gain more experience in relative safety, and so reduce the risk once they have gained their licence and can drive unsupervised.

The practical driving test has been improved in recent years, but it can be improved further still to better prepare learners to drive unsupervised. For example, expanding the independent driving section (currently being trialled by the DVSA, along with the use of SatNavs during this part of the test) should make the Test a better reflection of real driving.

More emphasis should be put on test candidates’ awareness of vulnerable road users. Manoeuvres, such as the three-point turn and reversing, could be tested separately (perhaps by ADIs before the Test) to allow more time to assess general driving during the Test.

## **Question 2**

**Tests might be offered from a wide range of venues. What factors should be considered in deciding on these?**

### **RoSPA Response**

A number of factors are important when considering new venues for driving tests, including safety, consistency, access to suitable roads and routes, congestion and the impact on local people and businesses.

Safe access to and from the venue, allocated car parking and pedestrian safety (both candidates walking to and from their car and the test centre and other pedestrians at the venue who are not there to take a test) must be considered. This will be especially important in popular venues, such as retail outlets.

The location must provide access to the variety of different roads that are used during the test, and access to a range of appropriate test routes. The roads and routes must provide a consistent test experience so that a candidate faces the same level of driving challenges and must demonstrate the same standard in order to pass, no matter where the test venue is.

The likely effect on local congestion, people and businesses should also be considered. Traffic levels are likely to increase due to test candidates using the location and the test routes, and due to learner drivers practising and taking lessons on the test routes.

Whilst we are aware that the DVSA encourage driver trainers to sit in the back of the vehicle whilst the test is being conducted, it is not a legal requirement and some trainees prefer not to have their instructor present and some trainers prefer not to be in the car. It is, therefore, important that alternative venues provide adequate areas for trainers to wait, along with toilet facilities for both trainers and pupils.

## **Question 3**

**We are interested to hear whether respondents would be willing to pay extra for more flexibility of driving test slots, both in terms of timing and location.**

### **RoSPA Response**

RoSPA believes that some test candidates would be willing to pay extra for more flexibility in when and where they can take their driving test. However, this introduces the question of fairness, and whether this flexibility is provided in some areas (for example, more affluent areas), but not others (for example, less affluent areas).

It will also be crucial to ensure that candidates cannot gain an advantage by paying more, for example, by being able to select a test at a time when there is less traffic. The DVSA will need to ensure that this does not occur and to avoid a perception that candidates can take an easier test if they pay more.

If there is a price differential, it should be proportionate to any actual increase in cost to the DVSA for using the venue. It seems unlikely that only the DVSA would be using a venue, therefore, a significant cost increase would seem unreasonable.

#### **Question 4**

**What could be done to ensure that candidates are better prepared for their practical test?**

#### **RoSPA Response**

See our comments in answer to question one.

We also recommend that consideration be given to measures to stop candidates just taking an intensive course over a week or two in order to pass their test. We believe that such courses are counter-productive because candidates do not have the time to gain sufficient, relevant experience, in the wide range of driving circumstances that they will encounter after their test. These intensive courses are often during the summer, with light evenings and good weather, and do not allow drivers to gain experience of driving in a number of different weather conditions or in the dark.

#### **Question 5**

**Would a financial incentive encourage learners to sit the test when they have a better chance of passing? At what level should such an incentive be set?**

#### **RoSPA Response**

Many learner drivers book their driving test too soon, and then fail it because they are not yet ready. Providing a financial incentive might encourage learners who are in a rush to pass their test to wait until they have had more lessons and driving practice before booking their test.

Our understanding is that many driver trainers book the test for their pupils as part of the service they offer, and the majority do not put pupils in for the test until they believe that they are ready as it is not in their best interests to do so.

The DfT is currently proposing a reduced test fee in the form of a deposit when the test is booked, that is then refunded if the candidate passed. If effective, this would give them a better chance of passing first time, and reduce their crash risk once they have passed their test and can drive unsupervised.

We do not feel able to suggest the level at which such an incentive should be set, but clearly it needs to be sufficiently high to act as an incentive, but not so high that the DVSA needs to increase test fees for all candidates in order to fund the discount.

However, it will require an administration system, and therefore, may actually increase costs for the DVSA. A careful assessment of the costs and benefits will be needed.

Waiting times for driving tests may also be a reason for some learners booking their test too soon in the hope that they will be ready by the time their test date arrives. If they are given a date earlier than they expected they attempt the test rather than risk postponing it and potentially facing a long waiting time.

An alternative (or additional) approach would be to consider whether it is feasible to allow candidates to delay their test for a set period (say a month) if they do not feel ready to take it. The implications for the test booking system and waiting time would clearly need to be considered, and a deadline set by which learners must request a postponement in order to avoid last-minute decisions leaving test slots unused.

### **Question 6**

**What opportunities and risks do respondents see in alternative delivery models for the practical test?**

#### **RoSPA Response**

As discussed in our response to question 3, the opportunities that might arise are primarily that test candidates would have more flexibility in when and where they could take their test. This could mean, for example, that a candidate might not need to book time off work to take their test, or that test waiting times might be reduced. The potential risks are that the consistency of test standards might be compromised and some candidates might gain (or believe that they gain) an advantage if they pay more.

However, problems could occur if a test venue closes down, or seeks to increase its fees to the DVSA in subsequent years.

Using examiners from the private sector would require very robust monitoring and quality assurance systems to ensure tests are not affected by a private company's profit motive and public confidence in the independence of the driving test is maintained.

### **Question 7**

**What factors are likely to attract potential partners to provide a service?**

#### **RoSPA Response**

Potential partners could be attracted for a number of reasons, in addition to the obvious reason of raising revenue. For example, it could link well with their current business and they could have space that is not currently being used or that they feel would be better utilised.

A cost effective approach could be to link with Local Authorities to use their sport and leisure facilities, which are often not used as much during the week as on weekends. If a site was needed for weekend tests only, retail outlets may be busier, but council offices and non-retail businesses that generally only work Monday to Friday may be readily available.

### **Question 8**

**What are the most important actions we should take to streamline the LGV driver licensing process, while ensuring standards are maintained?**

#### **RoSPA Response**

RoSPA has no further comments at this stage.

### **Question 9**

**Do respondents believe that the on-road and manoeuvring components of the LGV test could be conducted separately with benefit to the haulage industry?**

#### **RoSPA Response**

As trainers regularly teach more than one LGV/PSV driver at a time, conducting the on-road and manoeuvring components of the test separately could be beneficial to both the DVSA and the training industry. It could improve efficiency in the use of test facilities, save time for training organisations, especially if they are training a group of people and using more than one vehicle, and reduce test waiting times.

As an example, in a larger group 3 or 4 candidates could possibly have the manoeuvre part of the test all following on from each other, while other candidates who have already completed that part could start their on-road test from the same test centre with a different examiner.

However, it is crucial that the separation of trainers and examiners is maintained. A key tenant of driver testing is that trainers and large vehicle operators cannot certify their own drivers.

The DVSA and the motorcycle training industry now have several years of experience in operating the two-part motorcycle test, in which the manoeuvres are conducted in an off-road test separately from the on-road motorcycle test. Lessons from this experience may be helpful in considering whether to introduce a two-part LGV test.

#### **Question 10**

**In the meantime, however, we would be interested to hear suggestions on how, and not only in relation to vocational drivers, the Drivers Medical Service might resolve cases more quickly.**

#### **RoSPA Response**

One of the key factors seems to be communication between the drivers' own doctors or other health professionals, and the DVLA. We assume that the DVLA are reviewing the causes of delays to identify how and why they occur. Some form of incentive for a quick response could be considered, but this raises the risk that treatment for other patients might be delayed

Although we do not have sufficient information to make any specific suggestions we would like to emphasise the importance of the role fulfilled by the Drivers Medical Service, for all road users. When the latter crash, the consequences are more likely to be severe due to the size and mass of these vehicles, and in the case of passenger carrying vehicles, because of the large number of passengers they carry.

As the consultation paper notes, some delays in the vocational application process are unavoidable due to the need for medical investigations.

#### **Question 11**

**What more can we do to meet the needs of users, so that testing services could continue to meet industry's needs?**

#### **RoSPA Response**

RoSPA has no further comments at this stage.

#### **Question 12**

**Would an expansion in the number of LGV testers to include private sector testers be welcomed? Does industry have the appetite and capability to provide such an expansion?**

#### **RoSPA Response**

RoSPA is not in a position to answer this question.

### **Question 13**

**Is there an appetite amongst operators to be involved in such an 'earned recognition' scheme? What more do you think DVSA could do to process vehicles more quickly during roadside checks?**

#### **RoSPA Response**

Annual roadworthiness testing and roadside checks are an important way of ensuring that vehicles, especially large vehicles, are maintained in a safe condition. RoSPA agrees with the approach of targeting limited enforcement resources at the large vehicle drivers, vehicles and operators that are most likely to breach safety rules and procedures.

The consultation paper notes that the “DVSA is trialling increased use of technology and data to tackle some of the less serious non-compliance remotely, and also to target serious and serial infringements more effectively”. We believe that the results of these trials should inform the DVSA’s future enforcement approach, including whether an ‘earned recognition scheme’ would be effective in directing enforcement resources to the operators, drivers and vehicles that create the greatest threat on our roads. However, this should not go so far as to make compliant operators become complacent about their own safety standards and procedures because they think the likelihood of an enforcement check is very low.

### **Question 14**

**Are there other ways in which DVSA could better target enforcement on non-compliant operators?**

#### **RoSPA Response**

RoSPA has no further comments at this stage.

### **Question 15**

**What would be the best way(s) to ensure that commercial users are kept abreast of developments in the agencies?**

#### **RoSPA Response**

As we are not a commercial user, we have no further suggestions at this stage.

### **Question 16**

**What more could be done to expand and increase the use of digital services offered by the motoring agencies and what should be done for those who cannot or choose not to use a digital service?**

#### **RoSPA Response**

RoSPA has no specific suggestions to make, other than to say that individuals and groups who are not able to use the motoring agencies’ digital services should still be able to access these services through the more traditional routes of telephone and post. Clear details of how people can contact the motoring agencies in these ways should be easily available to the public.

**Question 17**

**In the past, services requested by industry groups have often not been used to the level forecast. How can we incorporate their requests into service design?**

**RoSPA Response**

RoSPA is not in a position to answer this question.

**Question 18**

**In providing assistance to those accessing digital services, are the agencies providing the right kind of help? Would web page pop-up assistance be valued? Would guidance for those assisting users (in, say, community centres, council offices or job centres) be more helpful?**

**RoSPA Response**

As stated above, individuals and groups who are not able to use the motoring agencies' digital services should still be able to access these services through the more traditional routes of telephone and post. Clear details of how people can contact the motoring agencies in these ways should be easily available to the public.

Guidance in community centres, council offices, job centres, etc would also be helpful.

Information and advice in GP surgeries and opticians about fitness to drive and the medical rules for driving would also be very helpful.

**Question 19**

**Is there a demand for developing and publishing an application programming interface (API) for fleet management software developers to build on? If so, which services should it cover? Is there industry appetite to lead this work?**

**RoSPA Response**

RoSPA's experience as a provider of fleet safety services and products is that organisations are increasingly seeking software tools to help them manage their fleets and drivers. They are seeking integrated tools that include driver licence and vehicle checks, driver assessment, training and education, compliance with company policies and procedure, incident monitoring and investigation and record keeping.

**Question 20**

**Would such applications be welcomed? Would the public sector be best placed to provide such services?**

**RoSPA Response**

We are not clear why the public sector would be best placed to provide these services, but a useful role for government could be to set minimum standards and good practice.

**Question 21**

**Are there any other social or economic factors which the review should consider in proposing either to reduce or to increase fees for these services in the future?**

**RoSPA Response**

Any future reduction or increase in fees for the motoring agencies' services should ensure fairness and equal opportunity are maintained and safety standards are not compromised.

**Question 22**

**Should fees more closely reflect the differential cost of service provision by different channels?**

**RoSPA Response**

RoSPA believes that it is reasonable for fees to reflect the differential cost of service provision by different channels, provided that fairness and equal opportunity are maintained and safety standards are not compromised.

**Question 23**

**We would be interested to hear from respondents what operating models for the agencies would best promote ever increasing efficiency, improve user service, maintain standards and deliver accountability to Parliament.**

**RoSPA Response**

RoSPA has no further comments at this stage.

**Question 24**

**We would value views from respondents with experience of VCA operations overseas on the value VCA adds to business or the automotive sector through such operations.**

**RoSPA Response**

RoSPA is not in a position to answer this question.

**Question 25**

**We welcome views from industry about the services currently provided by VCA in the UK and overseas, its effectiveness in supporting users and growth in the sector and whether the existing operating model should be retained.**

**RoSPA Response**

RoSPA has no further comments at this stage.

**Question 26**

**Are there any other areas of regulation administered or enforced by the motoring agencies, which you consider should be reviewed and potentially be safely reduced during the next four years?**

**RoSPA Response**

RoSPA has no further comments at this stage.

RoSPA thanks the Department for Transport for the opportunity to comment on the proposals. We have no objection to our response being reproduced or attributed.

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