



Department for Transport

MOTORING SERVICES STRATEGY CONSULTATION

Summary of responses – Driving Schools and Instructors

Annex A

Responses to Question 5: We plan to move to greater delivery of services online or by other digital means. Will these changes help you in your dealings with us?

1. The current system of booking theory and practical tests is fit for purpose however being able to view in realtime waiting lists at test centres would be helpful, as would be the ability to view the earliest week available at a test centre without starting a booking. Currently instructors have the option of being listed on the "Find Your Nearest instructor" service offered by the DSA, however only an email address field and a phone number is given, it would be useful for instructors with their own personal website to be able to list the website as well. This would encourage more instructors to look more professional, encouraging them to take business courses and raising the profile of the industry.
2. Yes, as long as the quality and real world feel of the displays are correctly displayed
3. Yes - although not clear what all of these may be.
4. Yes (x32)
5. Yes as call centres take time and you do not always get the result you are looking for
6. Don't know. If there's any possibility of on line hackers using information then NO
7. Yes service online or other digital will help if will be a clean plain english not to complicate for customers
8. I feel it will as contacting online is so easy to do. Plus with the modern generation of mobile smartphones, I would never be far away.
9. Should do if you minimise the rules.
10. Yes because the DSA website was one of the worst I've known including business link. It was very confusing and did not explain or provide all the information it should have done.
11. It would be helpful for us to be able to book or amend the Motorcycle Manoeuvre area for free training use on a Saturday online instead of trying to get through on the telephone. Also when the test centre are aware of cancelations they could email all the local schools that there is a slot available so that this slot can be filled by a student waiting to take their test. It would also be useful if a student successfully passed their module one and there was a module two test slot available on that same day to be able to offer it to the student.
12. yes - digital is the way forwards especially on smartphones and tablets
13. Yes. They save time.
14. Some services are well suited to being an online service, some are not. Sometimes face to face contact for services is easier and more effective
15. They will, however..... There is a need for us to be able to speak to a human who is able to deal with our enquiries when there are exceptional circumstances. It is to be encouraged that everyone go online wherever possible, but there are those who although potentially capable are deeply uneasy about dealing with these issues online (my parents to name just two people). It is not good at the moment when people are told that it is impossible to do things without doing it via the internet. Not customer focused at all.
16. Yes, but it is very important that people can still deal with DSA and DVLA by other means than digital eg still book tests by phone, still tax cars at post offices. If not, it discriminates against those who cannot afford the internet at home or are not capable of using it.
17. This has to be the way forward.
18. Probably.
19. No (x4)
20. yes will make life easier providing services can be accessed 24/7
21. The services I use (apart from DVLA) are already online.
22. I don't think so.
23. Any services that can be accessed online would greatly improve service to our customers.
24. yes the more information and easy to use methods always help
25. Yes, if genuine improvements are made to the services online, particularly with respect to saving time. I would also like to see it made far easier for professionals in the transport



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- business to express their views to the relevant agencies (in my case, especially the DSA) on a continuous basis. "Despatch", for example, purportedly offers the opportunity to comment via the DSA press office, but any attempt to do so bounces back unseen.
26. Only time will tell. In the past I have found the Driving Test Booking System to be slow and inaccurate as it did not appear to have been system tested thoroughly.
 27. Rather depends on response times when emails are sent.
What downtime will there be?
 28. Yes. Particularly if we (driving instructors) had more latitude in not only booking tests but also amending them.
 29. Yes, as it will save time and be more cost efficient.
 30. The terms are nebulous, but generally increased digital facility will be less tortuous and more environmentally friendly. Proposals involving mobile 'phone apps are, however, worrying in terms of the security issues involved.
 31. Yes if you get it right, it will speed up inquiries and service delivery saving us money.
 32. Provision of routine services by digital means is easy and efficient, however, in my experience it has become harder to contact a 'real person' to deal with the unusual or exceptional requirements that occur from time to time.
It is also harder to contact someone with genuine detailed expert knowledge as every non online contact is routed to a call centre.
A lot of the online information provided has been 'dumbed down' to the point of being inaccurate or incomplete, an example is <https://www.gov.uk/adi-part-1-test/preparing-for-the-test> which states that studying 3 books will prepare you for the ADI Part 1 exam This is wrong, there are more prescribed books to study
 33. Yes, will simplify my dealings with various agencies
 34. Yes, but it is surely unwise to be totally reliant on the internet.
 35. Yes will be more practical.
 36. Probably, depends on what and how you do it.
 37. No comment
 38. No, I prefer to use the phone
 39. Yes, provided that there is still channels available to talk with the relevant agencies when required
 40. Removing the Driving Licence Paper counterpart will make it more difficult for driving instructors to check that a learner's provisional driving licence is in order. How can we check if the prospective learner doesn't have any disqualifications, offences etc?
 41. Not sure
 42. Yes as long as there is still a way to speak to a human being if necessary.
 43. Yes, its quicker, convenient, and offers help 24/7, many of us who teach are unable to contact departments during office hours only.
 44. They already have with the delivery of the online test booking service.
 45. The current DSA website is too often unavailable because of maintenance. Speaking with learner drivers - they find the website to be non-customer friendly and too often unavailable
 46. Yes, this would be useful.
 47. maybe
 48. it means I can contact you 24hours a day
 49. Very much so
 50. Possibly?
 51. Yes - probably.
 52. Yes, it will make things more confusing, less helpful and in general a time-wasting exercise. We have too many unemployed people, put them into employment by giving them telephones to actually TALK to people needing help. Digital crap only helps people who want to ask the questions you have already answered.
 53. personally yes, although those who have not or can not use the facility may not be able to access as well
 54. Makes life a lot easier as paper and other media are dated
 55. Not really, but they may help my customers. At the moment, I already use on-line services



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- for booking of practical tests and it'd be nice to be able to book theory tests for customers too so that I can provide continuity of service to them... but that's all from my point of view
56. Yes. Trainer (ADI) booking of driving tests will be an advantage.
57. Yes, particularly via i phones & smart phones as we're usually on the road all-day in the car.
58. Only if online services are backed up with an efficient telephone contact service. Too many organisations 'hide' behind digital services and make it difficult to resolve problems.
59. Possibly, however, Many People struggle with digital media, and some want to avoid it completely. Such moves are universally seen as cost cutting only, and inevitably lead to poorer quality services and "customer" experience. Not everyone wants to spend their lives in front of a flicking screen.
60. If past experiences of online services supplied by Government Agencies is anything to go by, it will be detrimental.
Theory Test applications by telephone were withdrawn in January this year, and any attempt to get help for Special Needs candidates was met even when speaking to a real live person to do it online even though there was no way of asking for the needs of the candidate to be met with the online application form.
Any complaints apparently could only be dealt with by e-mail, even if the candidate did not have an e-mail address.
61. No comment
62. They will.
63. If these online services work as effectively as the DSA Test Booking service, then yes.
64. Easier to contact and more immediate response can only be good
65. Yes Keep it Simple
66. Yes. Very much so. Having access online and through one portal would make life simpler.
67. Not particularly. Online is fine as long as it works - which it usually does. The alternatives are equally acceptable.
68. Yes, easier access, at any time.
69. Very much so - quicker and cheaper for consumers and hopefully governing agencies.
70. Yes greatly
71. As long as its done with clarity then yes. Over-complication of simple issues has been a problem in the past.
72. Yes, it would be much better for customers to access
73. Possibly...depends on the accessibility and specific services and information available
74. as long as the computers don't replace all the staff
75. Potentially, but the services I use today are already digital and the new test booking service is very helpful. Removing the paper part of the driving licence will be good but I need to be able to check my customers for endorsements or my insurance to teach them will be invalid.
76. They will help if they are set up correctly.
77. Yes providing the response times from DSA, DVLA etc are improved. When a customer asks an online question there should be a response within 24hrs
78. Yes it is well overdue to find an alternative to the counter part driving licence and bring the UK in line with other EU countries.
79. Not really
80. Sometimes but if its not working or does not fit current needs then contact by phone needs addressing
81. As an instructor I need to check provisional licence entitlement and endorsements to satisfy myself that a candidate is both legal to train and covered by our insurance. Without the counterpart we would need access to DVLA records to check this.
I am not sure how I would be able to purchase VED online as I have fleet insurance and this does not work with the current online set up.
82. Yes these changes brings simplicity and convenient for us.
83. all changes produced so far did not benefit the way in which services are delivered
84. In most cases yes. However in the case of problems, certainly with the DSA, a means of



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- contact that used to exist was useful. DSA Customer Services is now a joke
85. My experience thus far with Business Booking with DSA has been largely a good one. Frustrations still exist with what is 'jokingly called' Customer Service, as there is no way this can be considered Customer Service when the department simply dodges questions by hiding behind technology.
We are the customer, customer service should interact and assist us not hide from us.
86. I think the services at the moment seem fine just a few things like the email sent to students taking a test saying they need a theory test certificate when attending for test, but I have never heard an examiner ask to see it, ever!
87. Yes, I agreed.
88. dont know
89. Yes certainly. After all the technology is here we might as well use it to everybody's advantage.
It would make the job a lot easier and would have great flexibility in the sense that you could book say a driving test at midnight and not just when the office is opened.
90. I hope so as long as they aren't complicated to use as some pupils are not computer literate and don't understand the jargon, So keep it simple and in laymens language.
91. Probably
92. Not specifically, but it will help to work online out of office hours.
93. The more I can deal with these agency's online the easier it will be for me.
94. yes if introduced after extensive testing to make sure it works
95. Probably
96. Maybe
97. Personally online is ok with me however there are still people who do not have access to online services
98. Possibly, as long as there is still the option of talking to a human being who is able to satisfactorily deal with enquiries.
Digital media where questions are not answered and that offer no further contact assistance are very frustrating.
These give the impression that an organisation is shifting responsibility for communication from themselves to a web page, and this is not a positive step.



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Annex B Responses to Question 7: Do you have any suggestions for the future structure of VCA or the range of services it offers?

1. Changes are required for a better future
2. get rid of it
3. I do not have day to day dealings with VCA, but I use vehicles and share the road with vehicles that will have been approved by VCA. I would be concerned if it were 'privatised' in any way, because whilst it is 'part of government' it can remain impartial, and have safety and integrity genuinely as it's core values. Introducing any aspect of involvement from commercial companies could mean that shareholders, share price and profit become the driving factors.
I am concerned that standards and integrity could suffer.
Government operations should be cost effective and deliver value for money, but private companies could potentially cost cut and compromise safety.
It can be worthwhile paying more for peace of mind.
4. I like the idea of trying to get the VCA to grow and contribute to the wider economy - this will make better progress.
5. It doesn't really affect me on a regular basis.
6. It should not outsource any work outside of the UK. There should be one body that we can rely on to maintain the integrity of the driving test but also as a driving instructor, to have the opportunity to provide feedback / communication regarding things such as traffic signage and especially to ask questions re driving instructor training which is currently quite appalling and unstructured and inconsistent.
7. N/a (x3)
8. No (x 27)
9. No - insufficient experience of the services
10. No - we have no dealings with VCA
11. No comment
12. No comment.
13. No you seem too be getting it right.
14. No, because I have never had any contact with VCA.
15. None (x7)
16. Not at present. (x2)
17. not at this time
18. Not involved with them.
19. Not really to be honest
20. Not really, sorry
21. Nothing else to add
22. Sorry, no.
23. Suggest that the government, enforce people with a driving licence take an assessment every 10yrs (when they have to renew there credit card licence) to make sure they are still able to drive safely of the road. This may reduce accidents, road rage and above all make safer drivers. Perhaps it may reduce Insurance Premiums. These assessment could be delivered by an ADI in a similar format as a Pass Plus scheme. The government can charge a fee (like with MOT's on Cars). The main benefit is safer driving for life. How many drivers over 40 have picked up bad habits, wreckless habit and how many have read the Highway Code book since passing there test?
24. The VCA needs to take account of real world situations and react to consumer demand.
25. Trying to answer the previous question (Q6) is impossible until it is known what will be decided.
I have no suggestions.
26. Why change what isn't broken. All your proposals will lead to are more automated answered call with and ever increasing list of menus none of which are going to cover the initial enquiry and will involve non uk call centres



Annex C Responses to Question 9: How would our plans to bring the driving test closer to the customer affect you as a customer or a business?

1. Access for my pupils is already quite local, however the provision of suitable waiting facilities is an important consideration. Not all students want their instructor on test with them so having somewhere suitable to wait for them to return is important.
2. Adversely affect business and safety. There have been numerous occasions in the past and the DSA will be wholly aware of this that Examiners have been dishonest and taken money for tests or other matters reflecting the manner in which tests are run and organised and security checks made or in the case of dishonest examiners not made at all. As I say the DSA will be totally aware of their own record. with no office and other persons around to ensure compliance the system will really be open for abuse. This is a step backwards for road safety.
3. All of the agencies identified in the consultation are regulatory agencies and not educational agencies.
The Driving Standard Agency should be involved solely in delivering the regulation of driving/riding and training standards and not in pretending to be an educator – something which it does not do well, and it is unlikely that many if any of those employed by the DSA have any teaching qualifications.
Driver and rider education should be transferred to the Dept for Education
4. Although we have a local dsa test centre. This policy should make access for some of my further out customers
5. It will assist my pupils to take a driving test in their local area, and area they are familiar with rather than travelling to another town.
My concern is that by using public car parks there won't be any facilities available (toilets, warm waiting rooms etc.) for either me or pupils.
6. as a business its not a problem as the cost is passed to the customer and with a lot of test centres that have closed and closing it will help people
7. As a Driving Instructor it would greatly. It could benefit the customer and offer a more efficient and more cost effective service.
8. As a driving instructor who lives and works some 25-45 minutes travel from the nearest driving test centres it will reduce the cost of learning to drive to my students and make the whole process simpler.
9. As a driving instructor, the more places that tests can be arranged the better it will be for me and my customers. It will also help to reduce the waiting lists. There is no obvious reason why examiners need to work from an expensive building.
10. As a DSA ADI (Driving Instructor) I am greatly concerned about any potential move that takes the driving test out of the hands of official government controlled bodies, and places it in the hands of an external business which will be motivated by profit. The simple fact of the matter is, the driving test MUST remain above the concern of making a profit to ensure that strict standards of safety, and fairness are maintained. I can really only see three avenues for such a business endeavour to make money, one would be to raise the price of the driving test, £62 is already quite steep especially for young people, considering that their average driving lesson costs between £20 - 27 an hour (depending on which part of the country you are in). Secondly for more candidates to be failed on test for minor faults, causing the candidate to have to take another test. After all, a candidate that passes their test first time, is not a good customer to a profit focussed organisation, repeat customers are. Or thirdly introducing some form of advertising sponsored revenue in the test centre. We are already overrun with ads and commercials, the last thing pupils would want is to be bombarded with commercial marketing in the test centre when they are waiting for their test. This is already an anxious and nerve racking period.
In short, I am not aware of anyone in my industry that is in favour of privatising the driving test. The safety of our roads is too important, and cannot be motivated by profit.



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11. As a fairly new ADI, I am surprised that not all of my colleagues endeavour to include, as a standard part of new driver training, a full range of driving scenarios. Whilst geography and the weather might prove to be a limiting factor for very bad weather or inner city driving, I find it difficult to excuse not including night driving and use of fast dual carriageways. The fact that these are part of the syllabus of Pass Plus goes a long way to explaining why I do not teach Pass Plus. My pupils have done everything except motorway driving and even that can be very well covered on a 70 mph long dual carriageway.

Therefore, the syllabus needs to change to incorporate all of the issues covered in Pass Plus. It seems to me insane that someone can learn to drive and pass a test in a city centre during daylight and then as soon as they qualify, are deemed fully competent to drive down a pitch black motorway at night. Every single one of my pupils have been grateful at my insistence that they drive at night, and by that I mean absolute pitch black narrow country roads, not a well-lit city centre.

I also heard today that the chap who vandalised a painting at the Tate Modern got two years. By the same merit, someone who races away from the Police, necessitating helicopters, numerous vehicles and officers to capture them gets community service, re-training orders and a completely pointless ban, given they were driving without a licence anyway. My point here is if a pursuit goes wrong, someone is going to get hurt. If it is the criminal, then that is just deserts, but it is far more likely to be some law abiding member of the public who ends up hurt, crippled or dead. This rather makes a mockery of justice. Two years for vandalising a painting or a few hours weeding for putting many people at real bodily risk, never mind the theft charges!

I was also lucky enough to be present on a taxi check point and discovered that while the police cannot check for drugs, Portsmouth City Council can and do. This might come as a huge shock to everyone, but after the initial success of catching lots of drugged up cabbies, conviction rates have dwindled to virtually nothing. One of Sir Robert Peel's criteria for successful policing was not how many criminals were caught, but rather, an absence of crime. In the case of the PCC drugs policy, by this measure, it has been an outstanding success.

The way it works is very simple. A roadside mouth swab is taken and put into a field test kit. If the kit reacts, then the driver gives a blood sample for accurate analysis. Lest we forget, this was exactly how the drink drive test worked when it was launched in the 60's. If such an approach worked for alcohol then, there is no reason why it should not work for drugs now.

We also need to clamp down on disqualified drivers. The ban is effectively a sentence that is worked in the community. If they choose to drive whilst disqualified, then they will not only face a further period of disqualification, but the whole sentence will be served in jail. If they have the assets, then by all means bill them for the jail time. By the way, prison is not the punishment, the ban is the punishment. Incarceration is employed because they cannot be trusted not to put innocent people at risk. Think of it as caging dangerous animals and everything becomes much easier and clearer.

The speed awareness courses seem to be very effective, but they are simply a one day course. What should happen is that participants are re-assessed by an ADI say a month after the course to see if they have made the effort to correct whatever needed mending. If they fail that, then they must continue with remedial training until satisfactory. This will deal with those who turn up for the day, nod, agree and leave. The objective is to improve driving standards, not just to talk about it. There need to be measurable outcomes and there is no reason why this should become a burden on the state unless miscreants fail to show up.

This self certifying approach works perfectly well in scuba diving, which I also instruct and there is every bit as much scope for injury in diving as there is in a car.

With regard to the test, the eyesight test is a joke. It does not test for night blindness nor does it test for glaucoma which leads to loss of peripheral vision, which is an essential part of driving.

The hazard perception clips in the theory test are all well and good, but at the end of the



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day, it is a computer game. Whilst I would not suggest scrapping it, I would advocate that the test should include a running commentary for some 10 minutes or so. This is a very successful technique that allows examiners to assess what people are seeing. It takes practice of course, but that is all to the good.

I have taken people to test who have passed but I would not suggest that they were competent drivers, despite passing. They needed much more training to become consistently competent. It is interesting to note that training a police officer to drive takes three weeks or 120 hours and they are already licence holders! The average student passes the test after around 45 hours of tuition. Whilst training the whole country up to police standards would be wildly impractical, there does seem to be rather a large gap which needs to narrow a bit.

We also need to take a proper look at cyclists and moped riders. I ride a powerful sports bike and in town, am regularly overtaken by kids on mopeds and pizza delivery scooters, all on L plates. The CBT needs something more before people can go out on the open road. Again, schools could recall CBT drivers after a few months for re-evaluation and extra training if needed. Given that the schools issue the CBT anyway, there is no reason why this should not work well.

I would also suggest that L riders are not allowed to modify their machines. It is astonishing how fast a moped can go with the right tweaks. I have been on a 50cc machine that claimed top speed of some 60 mph, which I can well believe but was far too frightened to test out for myself. I found the small wheel handling very unnerving.

As for cyclists, they have long been a menace. There are a few who wear reflective clothing, have all the lights and follow the highway code. I count myself among them. A considerable number appear to think that red lights do not apply to them, any more than do zig sag lines. Years ago, a bus stopped for me when I was out pushing the buggy on an uncontrolled crossing and I cautiously peered past his nearside. Just as well because this cyclist came hammering down the inside at a good 20 mph without the slightest intention of stopping. Had I not been careful, an adult male would have torpedoed the buggy with an 18 month old child inside, which could easily have been fatal.

First of all, laws need to be passed whereby if there is a cycle lane, it must be used and the carriageway is effectively out of bounds. Secondly, emphasis needs to be put on un-roadworthy bikes. Any bike on the road, must have working front and rear brakes, tread on the tyres, working lights and appropriate reflectors. Whether helmets ought to be mandatory is debatable. On the one hand, seat belts a bike helmets are required by law, but on the other, the only person who get hurt by not wearing a helmet is the individual. If no-one else is at risk, I would argue personal choice on this one once over the age of consent. Anybody under 18 wears one when not on private land.

Finally, a new regime for cyclists needs to come about. Those who break the law automatically go on a proficiency course, which they must pass. If they persist in lawless activity, the fines start to get heavy. A lot of these people drive other vehicles and if that is their attitude on two wheels, one wonders how much gets transferred to attitudes on four

12. As a PDI/ADI the option to have a wider choice of test centres for students to choose from should reduce the waiting time for driving tests.
13. As an ADI who resides in a rural location, I would welcome this move, as it could reduce the need for me to travel to and from the "test route area" and would reduce the element of "learning test routes by rote", which has to be better for driving standards. So, yes I'd support this, especially if "Set routes" were abandoned.
14. As an instructor I would feel happier if this was solely controlled by the DSA and there was no third party involvement whatsoever. I understand that not every area has a suitable test centre but we need to keep tight controls over all aspects on the test environment so that safety is not compromised by a profit driven organisation.
15. As I am a rural driving instructor bringing the driving test closer to the customer would result in less travelling time for candidate and would ensure they have more training time and would make the test fairer as the candidate would be able to sit the test in their own area. Candidates from rural areas spend three times more learning to drive so this would be a far



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more cost effective for the candidate.

16. As I am located in Wolverhampton (which has its own test centre) and sometimes have customers using the Lower Gornal or Cannock test centres travelling to test centres is not an issue. I can see how it will be useful in other areas of the country that are more rural and do not have the demand to justify running a test centre.
17. As I work in built-up areas well served with practical test centres it probably won't make a huge difference to me or my pupils, but in more remote areas it could be a big help. That said, driving theory provision is very spread out in my area, and some pupils are having to travel a long way to take the test. What would help far more is bringing down waiting times for practical tests.
18. As many of my customers live in more rural areas it will make my life as an instructor easier by decreasing the mileage on my car and increase fuel economy in a time where fuel is really expensive. It will also take the pressure of the candidate on the day of their driving test as it wouldn't be such of a rush as the every increasing volume of traffic makes getting to the test centre on time a panic
19. At present for most people having fixed test centres is perfectly adequate. In some more remote areas having examiners come to them would be useful. However having constantly changing locations could become chaotic.
20. At the moment, some pupils have to travel around 45 minutes to a driving test... that means 1 1/2 hours of driving to and from the test area BEFORE they've even concentrated on a specific subject. That's too far. Some of the test centres also suffer from poor access for parking etc and there are issues around many of them with local residents complaining about over use of test routes
21. Been waiting eight years for a more local testing site, find it hard to believe that you will achieve it in the near future.
22. Being a driving instructor for 25years in my local area [Wishaw Strathclyde Scotland] I was delighted to read the article on reforms to the Driving Test .Having lost my home town Test Centre some years ago [Wishaw] I have been forced to use other test centres, which has been to say the least very awkward for my pupils. After learning the control exercises in their home town, I then have to take them to a totally different town to continue their preparation to sit the driving test, this unfortunately incurs an additional cost to my pupils as they now have to take either 1 and a halve hour or a 2 hour lesson depending on which test centre is nearest, in these very difficult financial times this is an additional cost to the pupil which could be avoided by [Taking the test to the customer] I Sincerely hope the D S A will implement this and that the year 2013 can be the year to do so.
23. Better customer service for my pupils.
24. Closer the better crazy that a town of 100,000 like East Kilbride has no centre
25. Convenience, more realistic situation.
26. Could be okay depending on situated. Site
27. Currently we have to take our clients to a test centre nearly an hour's ride away (motorcycle tests) - this means we are limited to the number of tests we can present candidates for and the costs are far greater in terms of fuel, maintenance, staff wages.
28. Do not agree with Halfords branches being used.
29. Driving Test Centres should be Official places not for example Halfords etc!!. Personally it would not affect me but by using outside places would make the Driving Test even more inconsistent, as it is becoming year on year!!
30. Driving test I think in any Asda or Tesco or local government offices this will be great help to the local people.
31. Excellent, I'm alright with it.
32. Financially as a small business it is suicide. DSA expect us to provide a Casual/Customer Site at our cost. Yet DSA take 100% of the fee. The cost to ourselves would be significant as we have no site.
I still maintain that the MPTC concept should be just that and cover all tests on one DSA site. Taunton for example are closing LGV Test Operations, yet already have a perfectly



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- useable MPTC exclusive only to Car and M/C tests. No sense in that.
33. Greater accessibility and ease for the customer...less miles travelled
34. Having places such as halfords being the centre may make tests difficult for candidates with other motorists using the same area. Also having somewhere private for instructors to wait could be a problem. And instructors practicing locally may cause problems for other shoppers
35. Hopefully it might, reduce the carbon footprint I make as a driving instructor who has to drive at least 17 miles to my nearest Test Centre.
I look forward to a massive reduction in test fees now that MPTC have been abandoned and the DSA is reducing its outgoings in TC rentals by forming alliances with the commercial sector for venues.
But I have concerns that many aspects of driving will not be tested by using more rural centres.
This can only be resolved by Graduated licences as even now many learners are passing their tests in large towns/cities where they will NEVER go faster than 30 m.p.h, dealt with driving at NSL on a dual carriageway, encounter a roundabout that is not traffic light controlled, have dealt with livestock in any form, nor driven down narrow country lanes, or driven in the dark.
BUT....
Most KSI feature in country lane crashes in the dark.
Pass Plus has been a complete failure.
The Government should grab the bull by the horns and state that after passing the driving test ALL candidates MUST undergo further training within six months of passing the first test with a suitably qualified instructor, can I suggest a minimum qualification of Fleet Trainer as they will be driving unaccompanied, this solution would not require any more examiners to be employed, so no cost to the Government, but at the same time allow the MPs to show they really care for Road Safety to their voters.
36. I am a driving Instructor so it could affect my business, I am not keen on the proposed Halfords at the moment as the ones I know are situated at very busy & big retail parks & although I would be confident of my pupils ability I dont think the general public would be vey tolerant of pupils starting & finishing their tests when they are looking for a parking space & this may cause the public to take a dim view of examiners. I do like the idea of closer test but I think local ADI's should be spoken to regarding before a new location is approved. Then a meeting with local ADI's once a new location is approved should take place
37. I am an ADI and I'm not sure that taking practical tests from random premises closer to the pupil will work successfully.
I think its good that the pupil is asked to come out of their immediate local area and to get used to dealing with different and unfamiliar areas - and better for instructors and examiners to know well the area they are taking inexperienced drivers into for safety.
Its also essential for all to have a common place to meet and, discuss possible issues, take all kinds of tests from, speak to peers and each other, and to use facilities such as toilets and waiting rooms.
38. I am not sure that it will affect me as a customer and business user. Until tried not able to answer the question but all I can see at the moment is that it must be a very positive move for all involved in the driving test process.
39. I believe this will help quell nerves to allow a true picture of the driver to come out and account for many road conditions
40. I currently have a trainee requiring extended test and has to travel over 40 miles one way journey to obtain lessons for the test centre at which he is able to carryout the test!
41. I feel that the idea could be effective, but not if it is merely being used as a step towards the privatisation of driving test provision. I believe that having facilities dedicated to the provision of testing is important, not least given the expense over previous years for the MPTCs built around the country. A retrograde step.
42. I have read with interest some of the proposed changes in the motoring services strategy



document and would like to give my thoughts particularly on the way the practical car test is delivered and how I would like to see it change to maybe help reduce the accident numbers amongst new learners in the 17-24 age group. I am currently an Approved Driving Instructor operating in Essex and Suffolk and previous to that a college lecturer and assessor so with the experience I have had in the education sector I would like to see changes in the way driving lessons and the practical test in particular is delivered.

I would like to see the learner undertake at least 12 months of training and in that have three assessments undertaken by ideally the same examiner (one at four months, the second at month eight and the final one on the twelfth month). The first two could have the examiner in the back seat of the car and the final one in the front a little like the current test. Works a little like an NVQ which consequently will cost more to the learner (equivalent to at least three test fees if not a little more) but hopefully better thorough training is delivered over a good period of time so the learner will have undertaken driving in most scenarios and situations. There could be a system in place to 'fast track' a learner if they have had previous experience and also take the word 'Driving Test' out and replace with 'Driving Assessment' and also the instructor has to show proper training records and 'sign off' declarations that certain criteria has been met within the syllabus before assessments can be done.

I would like to think that each assessment lasts for one hour but only 45 minutes of that will be the driving and then the final 15 minutes would be for the examiner to give feedback and complete an appropriate Action Plan for the learner.

Instructors would continue to be monitored by the 'check test' which I understand is under review, but also this monitoring must also check that good records are being completed and kept by the instructor to show that all the areas of the syllabus is being covered. This might 'shake up' some of the poor instruction/record keeping being delivered but this can only be for the good of the industry and improve the quality of the training delivered.

As like an NVQ if at the end of the twelve months the learner has not passed the final assessment then the learner can apply for a further visit(s) by the examiner but obviously a further fee(s) will be payable which hopefully may not be needed.

What if any implications these ideas throw up as well as the costs is something that needs further thought and discussion but I would welcome any feedback to this and available to discuss further. I am only a very 'small fish in a massive pond' but feel that it maybe time that the current practical car test needs modernising and brought into line with current teaching and learning methods.

43. I live and work in South West Durham. My nearest Test Centre (8 miles away) closed in 2010 and now all learners in my area have to travel much further (which costs them more). Therefore bringing the driving test back to Bishop Auckland would benefit me and all learners in my local area.

44. I live in Thanet which is totally 'grid locked' with traffic. The current Driving test would need to be of an extended duration to cover the current requirements of the test, making it more expensive to run.

I feel that the test would be undermined if it was conducted from within other commercial services sites and it would not be viewed as professionally proficient as it is seen to be presently having purpose built facilities.

45. I run a driving school, so this has an effect on my day to day business.

I do not see the need to have a driving test centre on every street corner.

It makes sense to use resources sensibly and cost effectively, so if more than one section of government can share a building it makes sense.

In some circumstances it could be worthwhile considering sharing accommodation with private organisations, whether it is Halfords, a college, a supermarket or a hotel, but I do not see the sense in that becoming the norm.

Where accommodation is shared there should be good provision for ADIs and candidates, including a proper waiting area, and toilet facilities.

Why is it essential to have local test centres though?

A local test centre could encourage some ADIs to only teach driving on the local roads, and



some learner drivers to only want to learn on the local roads.

If there were fewer test centres, and so most people had to travel a little further it would encourage more learning to take place on a wider variety of roads, which would help road safety (obviously though they will always be local to some people)

Fewer test centres would also be more efficient, having a couple of examiners in each test centre, surely creates more administration, also if an examiner is off sick, there is less likely to be cover available, and any examiner deployed to cover for sickness would need to spend time learning the routes, so there could be more tests cancelled.

Having fewer test centres, with more examiners at each one would mean less admin and expense in managing the estate and deployment, and would also mean there could be more likelihood of an examiner being available to provide cover for absence, resulting in fewer cancelled tests.

As in other areas of life, I would rather travel and get a quality service than have a mediocre service on my doorstep, and for a lot of things we do have to travel, so why not a driving test?

46. I support in principal, but it is really an irrelevance. Far more important, is a complete overhaul of the driving test system and the way in which it is assessed. At present, it is a complete lottery in which judgements are made. Potential drivers are failed for making simple mistakes with no account taken of their overall performance on the test. In other words, a vast majority of tests come down to an examiner ticking boxes rather than using any skill to assess the drivers abilities or otherwise. It seems inconceivable that you can talk about improvements without a complete and open assessment of the driving test itself.
47. I teach in the Brighton area and take my clients to test in Burgess Hill, equivalent to a 20 mile round trip.
I would be able to offer far better value for money to my clients. They would be able to take shorter lessons ie one hour sessions, which in many cases is much more affordable to them in terms of cost and their available time. They would also benefit greater from more driving in Brighton as a more urbanized area but which also allows scope for national speed limit driving on dual carriageways. The increased mileage on my leased car is also a cost factor which is partly passed on to the customer.
48. I think a central point for tests is working fine, When you take away a certain place people can say that they couldn't find the test area and claim money back especially if they forgot to turn up.
49. I think all tests should be carried out by the DSA. Standards must be maintained
50. I wish to express my views on the current driving test as an ADI who has taught a variety of students.
The main things I find is that examiners are unable to allow for exam nerves, resulting in fails for students who are excellent drivers. They are also unable to 'get to know' their student, resulting in passes when maybe the student is usually unable to concentrate. The test routes and other traffic also mean some students are lucky and pass, and some are unlucky and fail. I wish to make a suggestion, which other instructors think would be good, however it would need a good level of organisation.
The current system is a pass/fail system, which only allows for one mistake which often isn't entirely problematic, and is often not the students doing.
Suggestion:
Stage 1: 1 x observation session: the instructor is giving the student a mock test with a debrief. The mock test is scored 1-6 by the examiner with 6 being perfect, 1 being appalling. If less than 4 is scored, the student cannot progress to stage 2 and has to reapply for stage 1.
Stage 2: 3 x 30 minute test sessions: examiner in charge, option for instructor to observe. One manoeuvre per test. Scored 1-6 as above. If any test scores below 2 = instant fail. If all above 2 the worst test result gets discarded.
- average of 5, taken over the observation session and 2x test sessions, needed to pass.
- emergency stop MUST be performed in one or more of the sessions.
- at least two different examiners



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- driving on a main road (with slip roads) and spiral roundabout should be included.

- to be done over a period of 2-4 weeks

I believe this will help quell nerves to allow a true picture of the driver to come out and account for many road conditions.

Please feel free to contact me if you have any queries

51. I would not be as busy

52. I would support bringing tests to local council office/ sports centres etc. I am less keen on using retailers eg. Halfords, Asda etc in retail parks.

53. If it happens, I would point out that our local test centre with a large population was suddenly closed in November 2010. We are still waiting for a refurbishment of a local lgv centre to go ahead, for our use, but in the meantime we have to travel in excess of 20 miles (minimum return) out of our area to the next dtc. This is causing more expense for us, as ADI's and our customers. This is not a good way of bringing the driving test closer to the customer, and despite many many requests, we are still waiting for some progress. So is this really going to happen.

54. If test centre locations are changed I would definitely like to see test routes published to help driving instructors.

I would be concerned about safely getting on and off public car parks and the effects this would have on bay parking.

I would be concerned about a rise in test fees or ADI licence fees, which are already far too high.

55. I'm an ADI who's been trading independently for the last 20 years.

Some time ago, I suggested 'mobile' test centre articulated vehicles. Essentially, something like the mobile NHS X-ray clinics that visit towns on prescribed dates and times.

The vehicles could be fitted out with a basic waiting area, examiners access and contain connectivity via Wi-fi to base and use various public or 'private' spaces by arrangement for parking and testing. This will more enable the public more helpful access to localized test areas. It will be flexible and should reduce the fixed costs of fixed-location test centres. Has an assessment ever been attempted with this idea?

56. In my local area it would not help as the three test centres I use are reasonably convenient - I appreciate that other areas do have problems as existing test centres are several miles away.

57. Instead of taking half a day and the costs associated with travelling 45 minutes to our nearest test centre, we would be able to present more clients for test and would have marked savings in costs.

NOTE - we vehemently disagree with using outside agencies/partners to deliver driver / rider tests.

58. it could cause problems to the motorcycle side of testing if by moving car test centres to other places and closing down existing test centres as over the past few years the motorcycle industry has taken a real beating at the hands of the DSA.

59. It makes the test even more subject to the "opinion" of the examiner rather than having a pass/fail standard

60. It may not affect me as I have a local Test Centre. However, matters are bad enough already with DSA's grossly inappropriate use of rural 'Test' Centres, where candidates hardly get tested, but are passed fit to drive on ALL UK roads. Some have merely driven in a village on a well rehearsed single Test Route. Driving Standards Agency? I doubt it!!

61. It might effect on the price we charge to hire a vehicle for the test.

62. It will depend on who is given the licence to carry out the tests and whether they will be conducted in the same manner as the DSA examiners are doing at present. Consistency and accountability, integrity are very important.

63. It will help the pupils who live a long distance from a current centre. I also believe it will make the test less intimidating if pupils meet their examiner a Halfords store or other partner location.

64. It wont affect me as I am a motorcycle trainer

65. It won't. My pupils book their own test due to the length of time waiting for the telephone to



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- be answered or the system being down...I do not have time .
Nor can I access the test booking page. So it doesn't affect me nor many others.
66. It would be a significant help. Since closure of our local test centre in Kilmarnock in 2011, our average mileage per lesson has increased by over 70% in real terms. This is quite simply, unsustainable.
67. It would be much better and more convenient and easier to find and parking
68. It would complicate the finding of the test "centres" . For example when pupils book a test at an Asda store test centre, they may not know which store they have booked. I foresee a much larger number of missed test appointments, which while increasing revenue for the DSA , is not good for the customer.
I have personally had a pupil book at Mill Hill in London instead of Cheetham Hill in Manchester , though that was a telephoned booking and accents/dialect may have led to confusion.
69. It would **DRAMATICALLY** reduce the amount of wasted hours and fuel that are currently required just to drive to the nearest Test centre. In this age of carbon emission reductions, the current situation is ridiculous. Please stop **TALKING** and start **DOING!** My local Instructors and I were looking forward to the 'Halfords' idea being rolled out next year - what has happened to that? Keep us **INFORMED!** Our local Council Offices are more than happy to locate test facilities there. Whatever you do, do it **QUICKLY** - we are sick and tired of 'talk', we need action! And keep us informed - this Halfords idea is a perfect example of how you unveil this 'amazing idea', then fail to keep **US** (the people it directly affects) up to date on the progress. If the idea **HAS** floundered, let us know. If it's still on the table, let us know. How long does it take to sort it out? Find a partner or partners who are willing to help, work out the arrangements with them (meeting point, parking spaces, etc), trial it if necessary, then roll it out! Even starting from scratch today, I could have that sorted before the end of 2013. If you can't find a national partner, ask the ADI's! We could form local groups who you can then liaise with to find a suitable venue in each town. You have the resources and man power - **SORT IT OUT!!!**
70. It would have a very positive effect on my business and my pupils. At present my pupils are having to wait anywhere between 12 - 15 weeks, which is completely unacceptable. Our driving test centre is only open for two days a week with only two examiners present. It should be allowed to open at least 5 days a week then hopefully the current backlog would no longer be a problem.
71. It would help to reduce costs to a certain degree, however it would need to not be detrimental to the availability of tests
72. it would make it easier for my pupils to get more on road practice on the roads they are most likely to drive on, instead of having to travel great distance to test centre.
73. It would make it much fairer to those who do not live very close to a test centre. They would take their test on roads that are familiar to them.
They would not be disadvantaged compared to those that do live close to a test centre.
74. It would make my business different and harder to operate if I was travelling to various locations to do tests. If tests were carried out of say a Tesco, at certain periods there will be very limited parking and access can be very time consuming.
Learners like the idea of having a general idea where they will be carrying out their driving test, and are more comfortable with this.
As an instructor I would rather have dedicated test centres to use, and have a good relationship with the test centres I currently use, and fear this would be lost and make instructors more detached from the DSA
75. It would make sense rather than have offices dedicated solely to the provision of driving tests, provided that criteria are met eg accessibility, parking, facilities etc.
76. It would make things a lot easier for myself and fellow ADIs but more importantly the learners looking to take their theory and practical driving tests. Some have to go a long way to sit a theory or practical driving test. Maybe try to have a facility where a DSA examiner could conduct a practical test in some more rural areas? Theory test facilities to be provided too?



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77. It would mean more time for the pupil to practice rather than the distance to drive to the nearest test centre
78. It would not affect our business at all, but it would give our customers more flexibility when deciding when and where to book their practical driving test.
79. It would reduce both my costs and those of the candidates. Although you can teach anyone to drive anywhere it would be unfair to ask candidates to take a driving test on roads which they had never seen before, therefore a period of familiarity is essential.
80. It would reduce my fuel costs
81. Just a bit awkward I think prefer the ongoing style
82. Less consistency of test areas, times etc.
Less Professional approach
83. Less distance to travel to test centre. Faster availability of tests
84. Less far to travel
85. Little or no effect but there are many in the motorcycle training sector who are badly affected by the current availability of test centres.
86. Living in Norfolk customers can live up to an hour, 30 miles from a test centre, this impacts upon their costs of lessons and booking instructors on test day. Nearer test centres will considerably assist those learning to pass their tests who are affected by rural isolation and poverty issues
87. Make it possibly harder to park in a suitable place when attending for test
88. Make sense to me to use a Customer Site which is currently being developed. However for this to incur zero cost to the DSA is outrageous.
89. Making tests available from a variety of different locations would make no significant impact on my activities as a driving instructor. However I must express significant concern with regard to the suggestion that practical tests may be outsourced to private companies. In my opinion, this countries high standards in road safety comes from the hard work of driving instructors, tutoring people in the skills required to become safe drivers in the modern driving environment and the rigorous testing that they have to undertake to obtain their full licence. This high standard can only be maintained through a fair but rigorous test. Moving practical testing to the private sector may well lead to a profit driven pass rate, devaluing the high level of integrity established by the DSA. It may even open the doors to the fraudulent acquisition of a full licence. Examiners accepting bribes/ favours etc. Delivery of the practical test must always be provided by a government agency to maintain impartiality, fairness and the high standards to which we all work to within the industry.
90. Many fewer miles to travel with clients/customers in order to take the test. This will save money through using less fuel and provide more time for other parts of the business day.
91. More convenient and should be more efficient.
92. More dates available for my clients.
93. More flexibility in remote areas - I am a driving instructor in Cornwall.
94. More flexible hours of work, more efficient for teach learners as I'm driving instructor closer to test centre will help and improve my teaching less time drive to and back test centre
95. Motorcycle testing is not delivered to meet the customer needs but for the convenience of the DSA. Rural areas are not catered for
96. My local Test Centre is in Crawley - some 10 miles away. Certainly that is far enough to travel. It is hard to assess the impact without having fine detail that will impact upon practice areas.
97. My students would not have to travel as far for a practical driving test. They would be more accustomed to driving near where they live.
Hopefully test routes would not be advertised and so "just learning the route" would be much more difficult for unscrupulous instructors, forcing them to teach to drive safely, not pass the test
98. No affect, as I live in a major city, but it would improve the rural elements of our business.
99. Not at all



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100. Not really. Chippenham Test Centre is within 10 miles of the majority of my pupils.
101. Offer customers less travelling time to a test centre, so that their money is spent on lessons & training, and also fits into their working or study day.
102. Our local driving test centre closed 3 years ago and we now have to travel 16 or 25 miles to the nearest test centres.
103. Our local test centre was closed down due to an issue over planning permission for a multi test centre, therefore test candidates in some rural areas face a one hour or even longer to get to the nearest test centre
104. Personally it would make my job more difficult as I currently live near a test centre that all my pupils use.
105. Personally they wouldn't as my local test centre is just 2 miles away but I can appreciate the benefits for those in more rural areas.
106. Plans to locate tests in places such as Halfords that have no toilet or refreshment facilities are a disgrace. At a time of one of the most stressful exams people undertake not having the opportunity to go to the toilet or obtain a drink of water are barbaric.

The Halfords sites in my area also lack adequate parking facilities.

107. Positioning of practical and theory test centres greatly affects the direct cost to the customer, both in learning and in attendance for the test itself. It is not valid to suggest customers of the service can practice locally and only visit the test area on the day of their appointment. The cost of training throughout both economically and environmentally impacts hardest upon the poorest (i.e. rural) sector. Currently it is arguable whether DSA is providing any sort of adequate service to these customers.

Further, concentration of test centres also means concentration of learners in those areas, alienating local opinion. As a business I can fulfil my obligations better at less cost to the customer if test centres have a broad distribution.

108. Possibly less travelling and more time to train pupil. Should also help towards saving fuel
109. Probably driving tests conducted more frequently so preventing a long time waiting for test dates, as I live and teach in a remote area in the Cairngorms.
110. Probably not much here in Huddersfield as we have a very good test centre.
111. Providing suitable areas are available then it cut the current costs travelling to and from testing sites, this will cut down on emissions, less fuel used particularly for motorcyclists it will mean a shorter safer journey to a test centre particularly in winter.
112. Stage 1: 1 x observation session: the instructor is giving the student a mock test with a debrief. The mock test is scored 1-6 by the examiner with 6 being perfect, 1 being appalling. If less than 4 is scored, the student cannot progress to stage 2 and has to reapply for stage 1.
113. Stage 2: 3 x 30 minute test sessions: examiner in charge, option for instructor to observe. One manoeuvre per test. Scored 1-6 as above. If any test scores below 2 = instant fail. If all above 2 the worst test result gets discarded.
114. Suggestion:
115. The current system is a pass/fail system, which only allows for one mistake which often isn't entirely problematic, and is often not the students doing.
116. The DTC in my area is a remote off Inverness. If bringing the test closer to the customer means having a full time test centre in Alness, then that would be good. At present tests are carried out on Mondays, Tuesdays & Wednesdays only. There is usually a 2 - 3 months waiting list for tests here.
117. The proposal does not consider road safety. To maintain a high standard of driver education and road safety it is necessary to standardise driving tests, not to make them available in areas where a much reduced skill set is required. This lack of consideration of the effect on road safety will most probably have the result of costing the country considerably more due to the financial and emotional load of the inevitable increase in road traffic accidents. This will not just affect me it will AFFECT US ALL.



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118. There will be more areas/ locations to travel to during lessons which will increase the mileage to and from the lessons and with the cost of petrol going through the roof. I believe your not looking at the bigger picture. To many big companies are closing down with no notice
119. There would need to be checks in place to ensure that tests were not adversely affected by holding them in more public areas
120. this all depends on choice of venue and whether or not the premises used could be construed as an endorsement of the premises provider
121. This can be achieved by minimal cost to the DSA by utilising the existing car driving test centres to carry out the Module2 part of the motorcycle test.
122. this is fine in some areas but will not work in all
123. This would be a great asset for not only me but also my customer's.
In my particular circumstances I teach learners to drive in certain areas of Glasgow that are not that near my local test centre.
For instance making Halfords a partner would be great for my pupils because I believe there has been one which has been ear marked in East Kilbride for use.
Now currently I have a few pupils who live in East Kilbride and they can maybe only afford an hour's tuition so I am unable to take them to the roads they would actually be driving on for their test as I would not have the time to get to Shieldhall and back.
Whereas with Halfords in East Kilbride it is local to them and me. I can then teach in the area where the test would be conducted. I feel this would be a win win situation.
124. Using other locations for driving tests would give my driving candidates better access to driving tests rather than on fixed test centre location.
125. Will help my business.
126. Without details of how this would operate the question is impossible to answer.
127. WONT AFFECT ME AT ALL
128. Would help both myself and my pupils.
Having tests delivered other locations than mptc's, would mean candidates for the driving test, could then carry out their tests on roads they know and are familiar with.

This would therefore give greater insight to the candidates ability to drive, as opposed to their ability to drive outside of their comfort zone or navigation skills.
Many test candidates from outlying areas, are brought into cities to carry out their tests, when very little training is carried out there due to time and financial constraints.
Candidates need to be placed into a more natural environment to achieve the best from them...
Ideally leave it to instructors to decide if someone is fit to drive on the road with an assessor situated in the vehicle as an observer, allowing the pupil to drive relaxed and not stressed due to test nerves.
Many instructors will recall the good driver who has the ability to pass first time, but due to nerves etc they take numerous tests, hitting both their pockets and confidence and even in some cases forces them to stop.
The driving test at the moment relies on too many factors other than the candidates ability, maybe retraining for existing drivers who have become complacent with their skills and knowledge would be the best option
129. would not change anything
130. Would prefer going to a test centre!! Customer is happy coming to you so why change it!! Don't see the benefit of it!!
131. Yes I agree that the use of other areas other than the test centre can be beneficial as I have long thought that learners who live away from the test centre area are at a disadvantage. However, the present system does at least give all candidates experience on the same types of roads for their test. I can see that for some people they would find this easier and cheaper. However it is then possible that they would not experience all road conditions as they do now. On balance I think you either have to set up more formal local



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test centres or stick with what you have. I do not understand the use of private land/buildings as a positive move.

132. Yes, making driving test mobile would be in line with the "teaching safe driving for life" campaign, as opposed to the current system that encourages learner drivers to "learn test routes".

This should also ease congestion in test centre localities. For example some test centres are perceived to be "easy" these tend to be overbooked! If test centres are mobile the possibility of reduced waiting times become more realistic especially if also helped by the private sector.



Annex D Responses to Question 14: Do you have any comments on our plans to reform HGV, bus and coach testing?

1. Although I have answered " I don't know " above I would like to say however that if the plans would make better and safer bus and coach drivers then I would be all for it and would support it.
2. Even since the recent changes (reduction) in manoeuvring area dimensions it has been extremely difficult for me (and other PCV Driver Trainers) to find suitable, and safe, areas on which to practice the 'S' manoeuvre. Controlled and regulated access to LGV/PCV manoeuvring areas for Trainers is the only reasonable option.
In 2008 I was successful at every stage of the interview process to become a DSA Driving Examiner. Whilst waiting for my course at Cardington I received the news that there had been a recruitment freeze (due to the recession) and I was told I would be completely wiped from the DSA system (as though I had never existed). I was told that 'in the future' if I wished to reapply there would be no acknowledgement or credit for my previous success. I wanted to become a PCV Driving Examiner but was told this was not possible - and that I would have to firstly become a Car Examiner. I reluctantly returned to training. My point is this... you need to create a climate and system where DSA can separately and specifically recruit for PCV and LGV Examiners. I do not believe I could be any more qualified and experienced in driver training than I am at present. I would be pleased to reapply for an Examiner role if the system changed, as I have suggested.
3. Fine - as long as standards are not allowed to drop.
4. I believe that reforms proposed should require more involvement from those working within the industry and not only form the government side.
5. I think you have to be very careful that private organisations are not able to cut corners and reduce the safety of these vehicles. Easier said than done. If it is kept official then one would hope standards would be high and testing impartial and free of any commercial or business taint.
6. I would not like to see reduction in the availability of tests, or for customer sites undue restrictions on examiner days due to a lack of examiners being available
7. If the facilities already exist for the tests to be carried out by 'external' (DSA) Examiners then I don't see a problem.
8. It will be a lot better and easier this way with more stations open for HGV, bus and coach testing, making such facilities easier to reach.
9. It's not my key sphere of interest, but any improvement in standards resulting in safety advances has to be good. I think the standard of driving by UK HGV drivers is mostly very good indeed. As regards bus drivers it is geographically very varied, with local "culture" differences seeming to have an effect. In south Manchester, careless, competitive and aggressive driving of buses is terrifyingly widespread, and yet in north Manchester, Bury, Bolton, Warrington, Widnes and some other areas where I drive and work, it is vastly better.
10. Less Govt oversight opens up a greater potential for poor standards.
11. N/a (x2)
12. NO (x17)
13. No - insufficient experience
14. No, it's not an area as an ADI that I have much interest in.
Anything to improve the standard of HGV, bus and coach drivers however MUST be a good thing - perhaps something could be done to train TAXI and mini-cab drivers?!
15. No comment (x2)
16. No commenting
17. No comments added
18. No matter what is taught and forced down the average HGV or Coach driver you will not



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change their road attitudebreach of lighting laws...vehicles so decorated its hard to tell what is...needless and dangerous overtaking and cutting in

19. No not really
20. non
21. None (x9)
22. None as not enough knowledge of the subject
23. Not at this time
24. Not taken a huge amount of interest in this so unfair to comment.
25. Nothing to add
26. Only that the fewer test stations there are then the more difficult it is for people taking their tests.
27. Outsourcing testing will lead to more corruption or poor service delivery.
28. Perhaps stricter training for HGV drivers as they do tend to drive unsafely a lot of the time, ie too close, breaking their restricted speed limits, not focusing on their driving (mobile, reading, eating), approach too fast at junctions, not careful that they have to room to manoeuvre in tight places ... and so the list goes on.
29. planned by some desk jockey
30. Sorry, no.
31. The standard of testing also needs to be examined. For HGV's and coaches there needs to be testing that is of a higher standard that for car drivers due to the greater potential for these vehicles to cause damage.
32. This does not directly affect me, but I want the reassurance that other vehicles that I share the road with are safe.
If you are using VOSA staff to do the testing then this can be controlled, if you are allowing private companies to do the testing then I would have concerns over safety standards, as commercial interests could potentially conflict with safety.
33. we already have a very high standard in this country the rest of Europe need to comply as well
34. We are not involved with HGV, bus and coach testing so we are not qualified to answer.
35. Why it cannot remain in the hands of VOSA at VOSA sites is beyond me. It represents a dream business model, which the Agency have seriously failed to manage



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Summary of responses – Driving Schools and Instructors

Annex E Responses to Question 16: Do you have any comments on our plans to re-define organisational boundaries?

1. A 'one stop shop' approach is a cost effective way of reorganising, provided quality and integrity don't suffer in the process.
2. All ideas to revert to some form of service should be welcomed, as long as they are not a thinly-disguised cost-cutting exercise. Privatization of practical driving test services raises severe misgivings, especially if it rides upon the back of commerce. The opportunities for various outside agencies as a means to generate trade seems to devalue the test itself.
3. Apart from feeling it is a complete waste of money just to justify a few peoples continued employment, no.
4. As long as the service provided is not diluted!
5. As long as this does not make driving tests more expensive in the short or long term, and gives more local choice, it could be a good thing.
6. complete waste of money and time
7. Delivery of tests by the private sector is a bad idea. This must stay under government organisations so standards can be maintained. Tests should not be carried out by a profit making company. Costs will rise to the customer and standards will fall. A test cost the same in London or a Scottish Island.
8. Don't skimp on costs setting this up.
9. Ensure that it is phased to bring about change gradually so no loss of service provision to the customer which hamper their business
10. Flexibility of boundaries is very important, it is such a growing area & needs to move with the times.
11. From a customers point of view brining all of the motoring departments under one roof should make the service much easier to interact with.
12. I am hesitantly agreeing in the above question, so long as it is services such IT, call centres etc that are rationalised. I do not believe it would be right that frontline services that the different organisations provide be compromised due to rationalisation (aka redundancies)
13. I do not think private enterprise should have any role in driver testing, due to conflicts of interest and commercial priorities.
14. I don't feel I have enough detailed information on this to make a comment.
15. I don't know if you are going back on time by centralising everything all into one, I believe that has already prove that individual organisations produce more when properly organised that a whole central body controlling everything.
16. I have never understood why the DSA exists as a separate agency. The proposals seem to make sense as long as they are implemented with care.
17. I would appreciate change if it is going to assist the customer.
18. If it makes things simpler for the general public, it has to be a good thing.
19. If reform was carried out without vast expense to the tax payer then it could be worth it; what would be improper would be to spend millions on reform and then make many working grade staff redundant.
A common sense approach should be made with a focus on what is trying to be achieved.
20. If you allow driving schools the right to pass/qualify new ADIs you are opening a can of worms. There has to be independent testing of new instructors or the integrity of the system will collapse. In the same way that some driving schools sold Pass+ certification without doing the training , devaluing pass plus schemes to the point that insurance companies are no longer giving discounts, and the uptake has dropped off the scale , so some schools will guarantee a pass to potential ADIs and trouser £2000 + without training. This will completely undermine public safety as no one would know what standard their instructor had trained to.



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21. It is a statement of intent which is clearly positive, but that's all it appears to be. Whether it can be carried out effectively naturally remains to be seen. That's not a criticism, but simply an inevitable fact.
22. It only confuses everyone internally and externally
23. It sounds good but you really must make it jaw-droppingly simple and cheap for your customers to make direct contact with the department desired. PLEASE do not resort to 0300 numbers and a myriad menu choices just to get to the right person. Publish a definitive list of your specialist staff, their direct dial numbers and expertise - for the sake of the sanity of your customer base.
24. It'll just be a lot better having many services under one roof, therefore making customer experience that much easier.
25. Just try not to make too many people redundant in the current poor employment market.
26. Keep well away from the private sector. This is a public service and should remain so
27. merging of back office and support functions would make sense for reducing costs overall.
I would be concerned about too much merging of operational areas or the delivery of the tests as the DSA on the whole to my experience are able to do this to a high standard
28. No (x17)
29. No comment (x2)
30. No commenting
31. No comments
32. non
33. None (x8)
34. Not really
35. Not really
36. Nothing further
37. On a practical application. Just trying to get to the correct department within the DSA is difficult. Should various agencies be merged - there must be first class planning in the organisations contact arrangements
38. Please do not do things just for the sake of customer service, you have a far greater responsibility to all road users to make the roads safer and not just to make it a shorter distance to travel for a driving test etc.
39. Potentially could be a step forward, however, for example, with customer services, the staff would need to have training in all of the areas they would be dealing with as each is highly specialised, doubtful that it would not end up as many 'jacks of all trades' and 'masters of none'.
40. Rationalization of the various bodies should be beneficial to the country as a whole - provided this leads to more cost efficient delivery of services and fewer delays in delivery of the services to the customer. - Good luck with this - I fear it is little other than a pipe dream.
41. The continuing changes of Minister of transport shows just how low the priority is from this current government. We need long term commitment to get changes through
42. The recruitment process in particular with the DSA Examiner role, this is currently being controlled by the DFT, and not by the DSA,. Local recruitment should also be an option due to the skill and expertise required, and not decided by a computer generated ability aptitude test!
43. There are too many different organisations involved in the same area at the present time so I fully support any re-defining - as long as the focus remains on maintaining and delivering one of the safest road systems in the world.
44. Unfortunately I have heard similar claims before but in reality hardly ever do things improve.
45. Using outside sources may compromise confidentiality
46. We don't see anything in the consultation document which shows HOW these changes will improve customer service.



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Summary of responses – Driving Schools and Instructors

47. Where agencies have a link (e.g. motoring) it can make sense to share some 'back office' resources.
Cost and efficiency savings could be made by having one HR Department, one Accounts Department, and so on.
It could also potentially make it easier to work with colleagues from other areas if they are in one organisation with the same chief executive rather than two separate organisations with their own ways of working.
48. Why not deal just with - Department for Transport. Why all the sub-agencies?



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Summary of responses – Driving Schools and Instructors

Annex F Responses to Question 17: Do you have any other comments on how we can improve our service to you?

1. A much more user friendly digital / online service is well overdue
2. A serious cost-restricting exercise could be undertaken in looking again at the value of the theory test. I doubt sincerely that this has any impact apart from a useful portal for involvement by academia. But in short, more amenable testing facilities, with special regard for those who reside in the less densely populated areas, would be an improvement.
3. Allow a little more time between tests at the moment the time scales between one test going out and returning are very tight. Pupils need to get comfortable and use the w.c before going out on their test and at Durham because of the geography of the bays and limited parking it is causing some difficulties.
4. Allow more influence from individual ADI's rather than the big driving schools
5. Answer queries promptly and fully
6. Any improvements you make would be beneficial. I would personally like a more open discussion at the end of a practical driving test. At present the examiner gives his/her debrief and the candidate listens intently, not always understanding the terms used, perhaps this could be more customer focused, asking their feedback and how they think the test went.
7. As a driving instructor I find it frustrating that we (driving instructors) do not have more control over practical test bookings which I feel would simplify the process and drastically reduce costs.
At any given time we may have several pupils booked in for test, some of whom will ultimately need to change their appointment moving it forward or back due to unavailability, set back in training, unexpected need to expedite etc.
At present we need to address each separately, possibly cancelling or deferring one pupil's test whilst chasing a cancellation for another.
Ideally we should manage our pupils collectively so that if one pupil needed to defer and another expedite we could simply swap test bookings and update the DSA accordingly. This would simplify the process and reduce time/costs to ourselves and the DSA including examiners who suffer from 'no shows'.
Another option would be for driving instructors to be able to block book scheduled appointments in readiness for pupils looking to book intensive courses. This would prove invaluable during peak periods (school summer holidays etc) where intensive courses are focused on tight scheduling.
8. As I have mentioned, providing an easy way of regularly communicating with the DSA about ongoing issues that affect us would be a huge improvement. The delivery of practical services has definitely improved for the most part, but I know that many ADIs agree with me that it is incredibly difficult to make our views known. This is not just about being able to complain. We believe we have a lot of constructive input to offer on road safety and the standard of driving in this country. For example, I believe we could make a difference to the "problem" of safety among young drivers, but also to that of discrimination against the many good and sensible ones (just as there is MASSIVE complacency about the standard of driving by so many older drivers - experience does NOT make bad drivers better, only good ones). It infuriates me that drivers over 50 (I'm 53) automatically get cheap insurance, however bad they are, while good young drivers are punished simply for being young. The theory test has been made harder and harder (and in many parts, less and less meaningful), while the majority of drivers have never taken one! I would have grading and check-testing for all drivers, as ADIs have now, with those grades linked directly to insurance premiums. For drivers who never had to take a theory test, passing one now would improve their grade (if requiring everybody to take it isn't realistic). Finally, one personal complaint! I regularly look for earlier tests for my pupils, and since the recent



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- improvements (largely good), the system will no longer "remember" their licence and booking reference details, so that I have to key the whole thing in every time. This is infuriatingly fiddly and time-consuming, and is definitely not in line with "improving customer services". I'm done! Thank you.
9. As we can see already since the 19th of January there has been a marked drop in enquiries for people wishing to take their motorcycle test. This is due to the changes made to the route for people wishing to take their bike licence which has made the process a lot more expensive and difficult. We fully understand your aims in the three tier licence route to stop anyone who is still lacking experience from riding a full size bike, however, a simpler and less expensive way to achieve the same aim would have been after passing an A2 licence at seventeen and restricting them to a 33 bhp for two years you could have restricted them to 46 bhp at nineteen until the age of twenty one. More consultation on the views of the industry would be more use than listening to the European Union.
 10. Assist ATB schools in making contact with their local authorities with regards to facilities for training.
 11. Be more proactive
 12. Better and simpler access via the internet. Although changed recently I still find this complex and feel there is some way to go to get this right.
In recent years there have been disputes with staff over pay and conditions. This has resulted on occasions on tests being cancelled. Always a huge disappointment for pupils but also a hidden cost to them when the dates are changed. I feel that a much more satisfactory way would be that when strikes are announced you automatically cancel all test for that day and reschedule to another time and advise the pupils and instructors of the new arrangements. If that means all you examiners sit in the test centre with nothing to do for a day then so be it. At least you would have minimised the impact on you customers. It would also get you all back around the negotiating table quicker and resolve disputes in weeks rather than years !!
 13. Better communication at test centre level.
 14. Close ALL rural Test Centres. It is ridiculous that people are being passed fit to drive on all UK roads having merely been tested in villages.
 15. Consult with those that use the service when ANY changes are proposed - National Associations don't always represent their members best interests!
 16. Driving tests should provided in candidates own area not within an 18 mile radius
 17. DSA check tests should be organised at local level, by the DSA staff carrying them out.
This will produce a more customer friendly service, than the impersonal Newcastle based service, that currently exists and causes much frustration among DSA ADI's
 18. Email the driving instructor the date and time of our pupils tests which they have booked using our ADI no's. We can then keep track of pupils tests when they make a mistake or forget there date and times of tests.
 19. Ensuring there is only one body and one website providing all the information in one place is the best idea. Re-thinking driver instructor training so it becomes more consistent and doesn't rely on check tests and instructional tests so much. Once driving instructor training is improved we will have a lot more safe drivers on the road.
 20. Find a way to reduce the waiting lists for driving tests. In Barry the next test is three and half months away at present.
 21. go back to basics
 22. I am happy with present services
 23. I believe that simplifying methods will produce more and achieve objectives.
 24. I cannot think of how to improve the service myself and other customers receive. It will be interesting to see the outcome of this strategy before we'll find out.
 25. I have never really understood why I have to pay such a large sum of money to renew my ADI certificate...???... I paid my money for the qualifying tests, Yes we get the occasional Check Test, but the price of that piece of laminated card seems awful high.....Have you thought of lowering the price to those that get a higher grade...??.



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26. I hope the 'L' test gets turned into a graduated test as in done in stages, have 2 parts to practical test, 1) normal L test, 2) motorway and other high speed/difficult driving like city centres or country roads. Have the test charged at around £50 each and you can only move on to the next stage if you complete the 1st stage.
Pass plus doesn't seem to have the same effect on driving now then when it did a decade ago, its almost pointless. So this would hopefully reduce death or serious accidents for 17 - 24 year olds.
27. I think if you can create more partnerships in the future then that can only be good news for my customer's and me.
This gives my pupils more choice where they want to sit their driving test and also on paper it looks strong as you are providing a much better service than we are currently.
28. I would like to see a reduction in waiting times are tests, nine weeks is ridiculous for a practical test, surely if waiting times were reduced by employing more examiners, revenue and profits would increase as more tests would be conducted.
29. It is apparent that one of the main reasons for change is to encourage training providers to apply to have their own premises approved for LGV driver testing. One of the problems many providers have with this notion is that while their own reversing areas are suitable for training and in many cases testing, the location of these areas is often a bit isolated making it unsuitable for developing test routes in those locations.
I have a suggestion to make that would fulfil several key criteria:-
1. Maintain the content and integrity of the LGV test
2. Maintain and possibly increase the current fee levels from LGV testing
3. Allow many more training providers to use their own reversing area thereby allowing the DSA to close down some existing LGV test centres
The idea is to split the LGV test into 2 separate parts, much like the LGV theory test was some years ago
Part 1 would incorporate the LGV reversing exercise and the vehicle safety questions. In the case of C+E tests the coupling and uncoupling exercise would also be included. This part could be taken at the training providers own reversing area subject to meeting specific criteria. ie correct area markings and equipment etc.
Part 2 would involve the existing driving element of the test. This could be started at convenient locations ie a lorry park or large car park etc where suitable test routes could be developed.
The 2 parts would not have to be taken on the same day and a partial pass certificate could be issued after passing each part, much like the LGV theory test or initial driver CPC tests.
The time and fee structure for part 1 already exists as the Driver CPC slots at 30 minutes would be ample time to complete this part.
Part 2 would have a new fee as it would be shorter. I should imaging the time saving would allow for 1 extra Part 2 to be conducted each day thereby increasing revenues for the DSA and shortening the test waiting times.
I am certain that an analysis of test failures would show that only a very small percentage of failures occur during the reversing and uncoupling elements of the existing test structure. This would help candidates prepare more thoroughly for the driving part of the test which, it is fair to say is the main part anyway.
I hope you give this idea some consideration as I feel it achieves many of your objectives.
30. It would be very nice to actually have suggestions as to how things could be improved within Agencies acted upon.
However if one complains, you get a standard reply and things remain the same.
Specialising in the SN (Special/Specific Needs) market many suggestions as to how DDA (Disability Discrimination Act) could have been complied with have been ignored for many years and are still being to this present day, and in fact in many ways things have got worse for my clients/Agency customers in the service provided to them.
31. Just leave things as they are. Cut phone waiting times when calling DSA....less menu



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- choice
32. Keep up the good work
 33. Listen to front line instructors!!!!
 34. Listen to stakeholders and act in the best interests all round.
 35. Listen to the clients rather than those 'interested' bodies who claim to represent large bodies of people eg.MAG does not represent the views of those delivering or receiving motorcycle training / testing.
 36. Listen to the service users - too often 'interested' bodies are listened to - supposedly representing the masses, when in fact, they are self serving.
Bodies such as MAG DO NOT know what they are talking about regarding motorcycle training / testing - in discussions with them, they have stated total mis-truths - yet their input is sought and actioned upon.
 37. Listen to your stakeholders who train students and deal with the department who should be serving the industry.
 38. make it simpler to get in touch with the organisation you are dealing with should the digital system fail.
 39. Making contact with anybody at DSA is extremely frustrating and is very time-consuming. Having to plough one's way through so very many telephone menus just to reach the desired office/department is deeply frustrating. What I need as Trainer is to be able to make a telephone call directly to a person who is qualified to answer my queries without having to wade through so many unnecessary menu choices first. Give your departments direct dial numbers.
There is a greater need for DSA and DVLA to supply much more detailed on-line information e.g. driving licence entitlements, trailer entitlements, and vehicle weights. A beginning has been made but there is much more to do. I have recently had to telephone DSA Technical Standards Branch on no less than 5 occasions because of insufficient information on-line. The questions have been so complicated that even certain members of DSA TSB staff have had to consult with colleagues before supplying me with the correct information. DSA TSB have on every occasion been brilliant - but I should not have to make contact in the first place.
 40. More continuity is paramount
 41. more online service or digital services with plain english
 42. No (x11)
 43. No - everything's fine thank you
 44. no comment
 45. No more than I have already indicated.
 46. non
 47. none (x2)
 48. Not at present.
 49. Nothing further
 50. One of the important questions on here is about the move to online only. I am aware of some of the criteria regarding whether an answer is given, or a service provided via the phone is so broad that virtually no one in this day and age technically qualifies - I believe one question asked when trying to book a test is "Can you reasonably get to an internet cafe, or does a family member have internet access" Utterly ridiculous, and does not help people with real needs IT wise, but also wishing to retain their independence. Please don't go down that route. Very short sighted and not at all in keeping with equal opportunities policies. And a postal service for booking a specific test slot is not an acceptable alternative.
 51. Please ask ALL examiners, to be polite and courteous and far more approachable to pupils taking their tests; to be fair 8/10 are great, smiley and reassure pupils, however some examiners appear to have more than their fair share of 'bad days' - are grumpy, uncommunicative and can be downright rude, which has affected two of my own pupils in a very adverse way. Its soul destroying for them, and undermines a pupils opinion of



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- examiners in the main. Approachability is so so important.
52. Please listen to the people who are actually performing these tasks at present not the past, and who know how these things work in practice.
 53. Please try to make the (Car) Driving Test more consistent throughout the UK., I would feel then that the DSA was a more Professional organisation because for so many years it seems you could get your Licence far too easily. With Examiners simply ticking boxes with the inability or simply not allowed to use common sense!!
 54. Please, please re-open Bishop Auckland Test Centre and de-congest Durham and Darlington test areas.
 55. Recently suggested ideas to enable ADIs to book their own Check Tests when due are certainly a good idea. If, for example, an ADI was given a window of six weeks or two months in which to arrange a time when a test was due, this would help many who perhaps work part time or who don't work regular hours. Effectively this would make it like the driving test where people choose a time, date and place that suits them - giving them a window in which to do it would still mean they had to do the Check Test!
 56. Reduce test times at local test centres. Have "flexible" relief staff you can call on when test times are in danger of exceeding 3-4 weeks, beyond these times I believe is unacceptable. As an ADI if the test times are around 8 weeks (or more away) you have to book a test for a pupil guessing that they will be ready in that time. Pupils don't wish to have more lessons than necessary, as money is very tight, very few have a surplus of cash! Having booked a test sometimes pupils then drop back on their lessons because of cash problems, but they won't cancel it either, because they don't want to wait a further 2-3 months. this leads to pupils often going in a "bit short" and if they fail they have wasted time/money and if they pass, they are out on the roads a "bit early" and may be truly at risk to themselves or other road users.
 57. Remove all the current agencies who are "Responsible for" but have no "Responsibility". Revert to ONE single Transport Department with departments all answerable to a clear structured management system so that there is uniformity and responsibility throughout the country
 58. Remove the need for test certificates by allowing the examiners to use pda's which can upload data direct to dvla; saves errors, stationery and postage costs
 59. See Q16 answer
 60. Should also have a plan to introduce retest (driving test) every 10years as you see daily a lot of unsafe bad drivers on the road who has pass their test but not driving according to the standards causing unnecessary roadrage, congestion, speeding, rushing, cutting you from left, not using correct lane on the roundabout, unable to park the car, parking on zigzag line, speeding lights causing accidents.
Thank you
 61. Stated previously.
 62. Stop blaming ADI's for the failure of the driving test when all ADI's do is bring people to the standards required by the driving test
 63. Stop changing the wheel and start delivering the services efficiently and fairly to all customers. Achieve this by better training of those delivering the service.
Stop discriminating against customers who are not computer literate. Especially the current theory test - I have had a number of pupils over the years who are perfectly good drivers well capable of passing the practical driving test, who have been unable to sit and/or pass the theory test due to learning difficulties. As a result they have had to give up learning to drive.
 64. Take more notice of our ideas and don't be dismissive of our questions, ideas or suggestions, this happened when the 2nd ec licence directive was put into place and caused serious accidents to occur on module 1 test, I along with other organisations warned the DSA on numerous occasions long before (2003.04,05.06) the mod 1 test was introduced that high speed elements needed altering, and it took a year for the DSA to realise we were right.
 65. Thanks for having a go!



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66. The DSA management need to get their act together and to communicate better with its customers. Especially the staff at Nottingham. The staff that are completing the driving tests are fine.
67. The DSA telephone contact centre tries too hard to deflect calls to the website. When I call, it is because I have already got as far as I can with the website and need to speak to people.
68. the monopoly for testing should be removed.
69. The skills required to drive are totally different now to 1935. Yet it is still legal for anyone to fix "L" plates to a car and teach their relatives or friends. This should have stopped years ago, as to the best of my knowledge it has throughout the rest of the E.U.
I am concerned that if motorway driving tuition is allowed to ADIs for their pupils prior to driving test, it would mean any learner could do it. A recipe for disaster.
70. To listen and act on what you're being told.
71. To quote Elvis - a little less conversation, a little more action. And when the 'action' is happening, keep us up to date - even if it's NOT good news. Good communication is the key ingredient to ANY successful relationship.
72. Treat driving instructor with respect. The current system treats us like unpaid slaves of the dsa.
73. When driving test centres are closed, or tests cancelled due to eg bad weather, it would be good if ADI's and candidates were to be informed by text or email, rather than having to guess, and making fruitless journeys to the test centre. Also it would be better if we were given a valid reason for cancellation, because at present they can be cancelled when the roads are perfectly safe.
74. Whether it is an individual or a business people simply want things to work and to receive good service, what exactly happens in the background to ensure that that happens, will not be known to most users of your services.
What is important is that we receive a good service, and as it is in a field that has safety implications the integrity is maintained.
I want to know that if someone passes a driving test, or a vehicle passes a roadworthiness test that the test is sound and reliable, and there are no commercial interests having even a tiny effect on the outcome.
75. Work WITH others connected to the industry. I have often heard it said that the DSA seems to adopt a "we know best" approach if its actions are questioned (eg motorcycle swerve testing).
76. Would like to see examiners provide some form of encouragement to pupils who have not been successful in the practical test. One example I can provide (I was present during test) is a young mother who provided a faultless drive with one exception. Driving down a street when told almost 1/4 of a mile back from relevant junction "turn left at traffic lights ahead" and there was an entrance / junction to her left. She signalled left prior to that junction but my argument was that it was an "exit" only junction therefore I felt her mistake could have been left as a "minor" fault and advised by the examiner accordingly!
77. yes treat us more like the customer and not the you are hear for us approach
78. Yes. Bring driving tests to the customer - without delay! It is however extremely important NOT to dismantle the DSA. The British driving test must not lose its integrity to money grabbing privateers.
79. You doing all good to make the our servicing to be higher standards quality.



Annex G: responses to Question 18: Do you have any other comments on our approach as outlined in the strategy?

1. A change of attitude would be a start! Get rid of the “Them and Us” attitude. For far too long the Driver Education profession has been treated with disdain, instead of customers. Trying to get tests when our customers want them against when it was convenient – especially Saturday testing – has been an issue for far too long. Even as recently as the last quarter of 2012 I was told by the CEO the reasons why testing was not available on Saturdays (for Plymouth) was because the weekly test slots were not full up, and in any rate pupils could find time to take a weekday test if they wanted.. This is sheer arrogance! Any new strategy needs to be an improvement and has to be trusted that it will work?
2. As always, worried the once satisfactory service of the DSA is going to be hacked about once again in an atmosphere where change for change's sake seems to be the zeitgeist.
The more I read in output from the DSA of late, the evidence I get of penny-pinching, minor measures which I'm sure cost far more to research than they yield in terms of economy.
3. From the point of view of an ADI delivering training to keep new drivers safe on the road, one crucial piece of strategy appears to be absent from these plans.
This is that in order to keep driving standards high, and encourage existing license holder to practise safe driving for life, a recurring 5 year check test needs to be carried out on all current license holders to ensure they are still able to drive at a safe standard. This would reduce road accidents and deaths and keep driving standards at a reasonable level, which does not happen today. In short, quite frankly, driving standards among existing license holders are appalling, and no wonder. They never have to prove otherwise until they die of old age, or get arrested. Far too late.
This policy would show the DSA mean business to encourage safe driving for life, and it would bring it a nice bit of revenue from all those drivers that fail. It's what I would call a WIN WIN WIN situation.
4. Hello, my name is xxxx (personal details redacted) and I am a qualified ADI. I would like to take this opportunity to put across an idea I have had for some time. As you know, after qualifying as an ADI we have to have a check test every once in a while to ensure that our teaching is still to a satisfactory level. The better grade we achieve the longer it is between check tests. I would like to suggest that after someone passes their driving test (cat D) that they too will receive a check test. This could be every 5-10 year depending on the grade achieved. A lot of drivers fail to continue using safe practices, whether it be failing to signal off of a roundabout or checking mirrors and blind spot before moving off. There are many drivers that I believe need to improve their driving for us to allow them to be on a public road. You could grant this extra work to ADI's who for example would assess ones driving for half an hour with a debrief sent into a relevant party such as the DSA. To avoid conflict the driver will not be made aware of how they have done but will be informed in writing within a week or two.
Grade 1-6 just like the check test for instructors. Grade 6 = left alone for the full duration of 10 year. grade 5 left alone for 7-8 years. grade 4 = checked again after the shortest term of 5 year. grade 3 = allowed to keep their licence subject to undergoing 2-4 hours tuition on the subject deemed unsatisfactory. grade 2 = Must undergo training of so many hours until signed off by instructor before allowed to drive again, check tested again within a year. Grade 1 = Stripped of licence and must retake a full retest to satisfy the DSA. The ADI to give ones training must be different to the ADI who check tests them. One can appeal against the decision of their check test and receive another by a different ADI but only the one time.
5. Hi, just to let you know my thoughts on the changes are , Aid's should have a choice at the end of a check test, i.e should be asked: would you like debrief and written report same as learner drivers. Adi part 3 result should be given after test there and



then not 3 days later many thanks.

6. I am concerned that using private companies to deliver the practical driving test would make the test seem less neutral in the public's opinion. There may be a feeling that examiners will fail people in order to inflate the work level that their companies receive.
7. I am in the process of renewing my ADI registration and my Fleet registration. After 20 years of teaching learner drivers I now work in class-room environments only, as I deliver training to driving offenders – Speed Awareness, What's Driving Us' courses and do not use my car for any type of instruction. On my next check test I would therefore like to be assessed on the work that I currently do and not be assessed on coaching someone on the road. Is the DSA moving with the times and recognising that quite a number of ADIs do only this type of work? Are you check testing the work that we do and not what we used to do ? I would like to think that the £420 joint fee is used in a constructive way and one that will assist me in my current work.
8. I disagree with the private sector being able to conduct tests, I feel this would compromise the integrity of tests, and would undoubtedly lead to an increase in test fees and ADI licence fees as profits become a priority over standards and good customer service. I also have safety and practical concerns over trying to conduct tests on public car parks where the public may not realise a test is taking place and become impatient, resulting in a hostile response.
9. I do not know anybody who does not have a mobile phone, of course particularly useful for businessmen/women everywhere. I object most strongly having to make telephone calls from my mobile to 0845/0870/0300 numbers and similar chargeable numbers. Yes, they may be numbers with local charge rates applied - but from a landline. If I use my mob phone to call any such numbers I am automatically beyond my agreed contract and find my bill is increased unnecessarily. The only person/organisation who benefits is the one with the 0845/0870/0300 number. For example, DSA needs to return to territorial STD numbers e.g. 0115 for DSA Nottingham, which will save me (and many thousands like me) money when using my mob phone.
10. I fully accept that cost savings must be made by all government departments. But I urge you not to put cost ahead of service to those whom you serve.
11. I have concerns over the impression that the DSA could be looking towards privatisation.
The DSA provide an independent service in the delivery of driving tests across all categories, and to this end there is a lot of integrity on the delivery of these tests, examiners are trained to a high standard, and whilst there may be differences on occasion everyone is trained to a high standard, they are accountable to the DSA alone, and not to an organisation that also delivers driver training and the DSA are able to monitor and assess examiners.
The DSA can be held to account through "freedom of information" which a private company would not be.
In order to make it a profitable venture then I would expect test fees to go up.
12. I have just read the proposal for the department of transport consultation. As a driving instructor for 12 years, grade 6, RoSPA gold award and an LGV/PCV driver before that, I like to think I have a bit of experience when it comes to driving. As for your proposal for the driving test, may I give my opinion on this, I find it hard to believe that someone can put something together so well but be so out of touch. No wonder there is so many young drivers in accidents on the roads, when the persons responsible for our road safety have not got a clue of what goes on in the real world. Until you start asking the questions from the people who are reasonable for delivering your so called proposals you will always have problems with young drivers as we are not allowed to teach them how to drive in the real world. There are things that could be put into place if only the government would grow a pair of balls and do something that would make our roads a safer place to drive on. An example of this is the way the theory is



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delivered, pupils only associate the high way code with the theory test, so once they have passed it they never pick it up again. Would it not be better to split it up into 2 parts, theory done in a class room over a number of weeks, then take the theory, then gain some driving experience then do the hazard perception. Then at the end of the driving test have the examiner ask some question from the high way code, this would be of more value than the so called show me tell me, this is just one of a few ideas that my colleges and I have. There is a lot more I could say on the subject, but it will only fall on deaf ears. I do not know why I writing this, probably because it makes my blood boil when I read this sort of stuff from people who claim to have our best interest at hart, more like a laugh.

13. I know this email will go passed without any thought from yourselves, I have been a A D I for 38 yrs and have been a grade 6 since the grading system started .

In the last 5 yrs I seen the quality of instruction drop to its lowest level . I put the blame solely the D S A by dropping the standards to become an instructor i.e. making the exams easier, more revenue for the D S A .

Which leads to the lowest pass rate ever, more revenue for D S A

I now feel an A D I is not a respected profession any more when you have schools charging less that the minimum wage i believe the D S A should take control of the situation now, stiffer regulation and impose a minimum cost per hour for all lessons given this would then sort the good from the bad because pupils would not be conned by schools such as xxxx (details redacted) offering all sorts of freebies cheap lessons to entice unknowing pupils . Also broadcast on radio and TV the grading system because nobody except an A D I knows about it or is your idea of pretending to improve the standard of A D Is but no knows about it.

So please lets have the same support as taxi drivers who have a set minimum charge or is this to much to ask.

A disillusioned A D I

14. I think it goes a long long ways to encompassing driving training, pass plus and far more awareness of the vehicle, how it works, and a greater understanding of more than just how to drive one. Can only be good for everyone. Please, please, please however, can we introduce a minimum of 10 hrs refresher training for anyone who has passed their test in excess of 10 yrs or more? Some of what I see parents teaching their children/my pupils (including poor attitudes) and a disregard for keeping to speed limits etc, really shocks and disappoints me. Also cyclists!! Please can they have a compulsory road awareness training so that not only should we be courteous to them, they should also be road aware, courteous and responsible on the road also.
15. I think the motivations of the approach are good, but as above, there are many positive changes that could be made, and I would like to feel that ADIs could be allowed to have a much more thorough role in helping that happen.
16. I thought I might use this opportunity to approach the subject of driving test centres and their locations. I am a driving instructor based in Selby, and use York as my usual test centre. The down side to going up to York is that from some of my pupils, York is a long way to go, some pupils from Goole for instance, Gilberdyke, Howden etc it takes 45 minutes just to get there, it alone getting used to the areas in which they could be driving on their tests. It makes it much more expensive for their lessons as sometimes they need a good 3 hour lesson to make it worth their while going up to York. Even other test centres near by such as Doncaster, Scunthorpe and Pontefract are a good 40 minutes away.

What I would like to propose or mention as an idea to make it easier on us the instructors and the pupils pockets is to have a base in Selby where driving tests can be carried out. recently, it was mentioned that the use of Halfords as a base was being tested and results would be interesting to see how it went. If Selby could use their Halfords as a base, I'm sure the DSA would benefit too as well as us for the number of tests being carried out in this part of the world. With York being the sole test centre covering a large area, waiting times tend to be a good 8 weeks sometimes as they



cram all the candidates in. test times would be reduced if another test centre near by like Halfords at Selby were to be introduced.

What do you think?

17. I'm a driving instructor covering Banbury and Oxford test centres, and it has come to my notice that Banbury test centre is on the verge of closing due to the existing lease not being renewed and the inability to find new premises to conduct the tests from. Please could you let me know what action you intend to take to rectify this problem? Clearly Banbury has a wide catchment area and to redirect tests to other test centres will not only increase cost of travelling for the driving instructors, the extended length of lessons for the pupils, not to mention the Eco factor.
18. It would seem that regarding the deal with Halford's that it was agreed by someone that has never taken a candidate to test. We call ourselves a civilised society, so how can you provide a driving test centre without a toilet for your customers, it's 2013 ! Given an oversight like this and the lack of emphasis on a standardised driving test I am very sceptical of the motives behind this. I hope this is not just a glorified money saving exercise.
19. just do it!
20. LOTS!, but after 35 years as an ADI keeping pace with the DSA tinkering with their so called test,I have always felt views of people like me is of no real importance to the afore mentioned organisation. Can you possibly explain what the DSA does post test,because we all talk about CPD yet there is no follow up to the inadequate test, until an Accident(Crash) occurs then shock, horror!, we find the main cause was poor if not dangerous driving. We need some form of compulsory post test supervision....Dream on!!!
21. lunatics running the asylum
22. Maybe too wide spread as one task
23. No (x15)
24. No comment (x2)
25. No commenting.
26. No comments
27. No... keep going! Reduced red tape and more simplicity is a good thing
28. non
29. None (x5)
30. Not at this time. Most of it seems positive in my opinion.
31. Nothing much more to say other than roll on when we can see any changes implemented, if it is what the public wants.

32. 2 responses received from one respondent:

- **Online response:** You say you have contacted stakeholders. How many of the 60,000 qualified ADIs have been notified. The DSA send e-mails to most of us weekly , yet no mention of this consultation. Part of the strategy is, as I see it, abrogation of the DSA responsibility to test and oversee new recruits to the driver training industry. Allowing schools such as xxxx, xxxx, xxxx (details redacted) etc to graduate people they train to full ADI is a license to print money as they would be able to advertise a guaranteed pass.

- **E Mail response:** I believe the idea to scrap the current DSA examined parts 2 and 3 of the ADI qualification in favour of trainers examining their own PDIs and deciding on their qualification.

This is so wide open to abuse as to render the ADI certification worthless. Unscrupulous trainers will be able to guarantee a pass and set their own price for "training, examination , certification and administration" This will be interpreted by some as , stuff £3,000 in my hand and collect your badge on the way out !. The Pass Plus scheme was a great idea. It provided discount to people interested in further driver training after the test, and gave experience in Motorway driving that was prior to their passing illegal, as well as many aspects of driving that



instructors rarely mention before the test. Then some instructors started giving out certificates without doing the training. Money for nothing. The insurance companies soon realised that those with pass plus had almost as many claims as those without ! End of discount !

If the DSA change the current system the standard of tuition will in a short time collapse.

33. Overall, I love the way the appropriate bodies are embracing technology and inviting collaboration from their customers. Definitely the way forward - congratulations.
34. Putting testing in the hands of private enterprise is a backward step and will lead to conflict of interest. Disagree with using Halfords as a testing site. Fire stations and other government buildings would be a better option.
35. Strategy is outlined and this is supposed to be our opportunity to respond, yet, the one area we were keenest to respond to is not covered within this response document - the use of outside agencies / partners to deliver testing (car and motorcycle) - we vehemently disagree with this.
36. The wording....putting the consumer and business at the heart of what we do. Sounds like consultant speak at it's worst. How much did you spend on consultants to come up with that marketing slogan? It should be blindingly obvious!
37. There is not enough detail in the strategy to enable an informed decision as to whether these changes will be beneficial.
38. This is yet another series of changes in prospect. Since I first sat the driving test there have been innumerable changes to various aspects of the test and its delivery. Basically cars are much the same as they were 38 years ago. The roads are little different - though their condition is much poorer - The biggest difference is how much more congested the roads are. I very much support many of the proposals in prospect, but I would plead that this be a final set of changes and that once they are in place a period of stability should be a priority. Change for the sake of change is rarely good. Change should be instigated where there is evidence of a true need for improvement. Too many of the changes over the last few years have simply been instigated to justify the existence of a new broom (head of the various departments) so that another civil servant can put a significant tick on his or her cv. The adage from the top of the tree downwards, should be "if it works - then don't fix it"
39. Timewasting?
40. To maintain Britain's economy do NOT outsource anything. Continue with good ideas like stopping foreigners who cannot speak English from taking the tests. Continue to ask driving instructors their opinions. Set up more workshops around the country for driving instructors to attend.
41. Vehicle Tax should be combined with Fuel duty reducing the costs for implementing road tax; and thus making sure 'everyone' who uses the roads contributes in proportion to their use.
42. Without doubt improvements are there to be made. However, as always, I am concerned that there is always the danger that we make the head fit the hat and not the other way around. Make changes by all means but ensure you are doing it for the right reasons and not simply save money in the short term, but, end up costing a lot more in the future because we have cut too far. We can see numerous examples of where changes are made, probably for the right reasons, but get it so wrong. We then end up with something worse that we started with and spend millions trying to put it right but have lost all the skills to do it.
My views are that :
 - 1)driving tests must remain with public staff, not private,
 - 2)that better and quicker use should be made of IT linking all the groups together so that physical data is not lost or changed,
 - 3)more checks to ensure all systems are working correctly and that no fraud takes place,
 - 4) while I agree tests should be more local in principle I am concerned that you will risk



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losing your current standards and I feel they should only be conducted from state owned sites not private.

43. Would anything be done if I actually did comment?
44. Would like to see the removal of the counter part driving licence and the need to display a paper form of tax disc.
45. Yes graduated licensing involving night tests, country roads and dual carriageways to seventy.
Also have some consistency in the testing at testing stations. A route with no real populated areas, one mini roundabout. No conventional roundabouts, no dual carriageways, no multi-lane junctions, & very little country roads dos not seem testing when they all exist in the same area.
46. Yes, you need to introduce compulsory "re-training" to all people who passed a test years ago, before the roads became so busy and tests became more tough.
You want to make the roads safer? Then make the drivers take more training to re-educate them to be safe on our ever changing roads. This would reduce accidents in the fastest possible way, saving thousands of lives.
47. You make no specific mention of motorcycle training, both learner and advanced (ERS) when this sector of customers is at the greatest risk, and serious accident worsened last year
48. Your approach as far as I see, only takes into account one point of view. Could you invite directly to all t hose involved within the driving sector, driving schools, instructors, examiners, drivers, rides, and so on to meetings where proposals could be evaluated well before any plans are put in place?