



Department for Transport

MOTORING SERVICES STRATEGY CONSULTATION Summary of responses - Employees

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. Allow information to be obtained in an efficient manner.
2. As customer strategy and research manager I would hope it would mean that we can deliver to what the customer wants from all our agencies. I don't believe this means that agencies need merging - just teams within agencies are more matrix managed and must evidence collaborative working around the customer need. This happens in spirit but not in practical delivery - I suspect the formulation of business plans in isolation may be a root cause along with lack of incentive to work together. We are much more internally competitive and insular than we should be.
3. As I work for VOSA ANY improvement in online and other services would only be an improvement and would help our customers
4. As long as it is easy to access, the proposal will make delivery of services to the public much more convenient. The current Gov.uk website goes some way towards meeting that objective but there are still areas of disconnect between the agencies.
5. As long as some telephone back-up remains - sometimes customers feel more comfortable speaking to someone for reassurance, or in case something goes wrong.
6. Being able to complete transactions for driving licence, tax disc and vehicle registration online is extremely helpful.
7. Being able to speak to a "real" person must still be available especially to customers who fall between the cracks of "normality" in the digital world.
8. Digital delivery should but only if implemented in a proper manner and lessons form the failures of digital implementation in for instance the health service have been taken on board.
9. Driving licence applications could be better developed as there are constant problems with the pages. Either server issues or the online system failing to communicate with the outdated MSDOS system. Investment in better technology to interpret licence holder and licence information
10. DSA is already at the forefront of introducing digital by default .

Customer choice has decreased. Removing methods of dealing with motoring services and relying on digital means disenfranchises swathes of customers. Those without digital access are in danger of becoming second class citizens.

It can be less convenient and make more time to obtain necessary certificates etc digitally than by attending and collecting them directly from a local office.

11. Given that the level of broadband access from our home address is appalling, and I do not relish the idea of taxing the car etc at 2 o'clock in the morning, I do wonder if this headlong rush to digital everything will actually be very popular outside the cities unless something is done to improve access.
12. Hopefully would give easier access at anytime of day, but present systems have regular faults at a cost to customers, it seems far too easy to blame a email or fax, when you speak to someone you have a name that you can refer back too.
13. I already interact with government services via online and other digital means. However by combining agencies, a one stop shop would be an improvement.
14. I am happy with the level of digital services that are currently on offer.
15. I believe it is the right thing to do to move towards greater delivery by digital means but we must take care when we use such phrases as mandate and 100% compliance or no other option. We must make sure we bring our customers with us and do not deliver an option of non-compliance thorough ignorance or choice.



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16. I currently live in a non-Broadband area in West Wales where there are no plans to supply this service. I will have to drive into my nearest town and use the PO to do business with you by digital means. So, no this will not help my dealings with you - only hinder and frustrate! Plus, you are pushing the cost burden onto me to access mandatory services which is never likely to keep me engaged/satisfied with your services!
17. I like the idea of less licence paperwork and possibly no tax disk, however as I don't have a computer at home I do prefer to be able to call when I need to, and go online when I am elsewhere and it is available.
18. I prefer to work online and conduct as much of my personal business online as I can, there are no time constraints and I can do it in the comfort of my own home.
Whilst there is much to be gained however from moving processes online, without massive investment in the infrastructure, I can't see how the agencies will support this push to 'digital by default' when we are working with network terminals that struggle with PDF documents and websites using Flash. The department would be looking at massive investment to overhaul our IT systems as they have gotten so outdated, unless the entire thing is outsourced privately, which has its own problems.
19. I still wish to deal with individual agencies.
20. I support moving to digital services, provided the services are robust. There are great benefits to be had for costs and convenience.
21. I think that digital services should be used along with existing means of contact. It is always better to talk to someone for 2 minutes and get an answer than to send messages all day and still not get an answer to a question.
22. If the hardware and software used is up to the job.
23. In my opinion this will only work if the infrastructure is put in place to continually develop & upgrade the systems in line with technological advances. Accessibility & availability will also be key factors in any perceived success or failure in adopting this approach.
24. In the absence of adequate information concerning digital assist, details of the digital services to be provided and the form of these digital services and without a sufficient equality impact assessment then we cannot respond to this question
25. It is difficult to say depending on your needs at the time. If it is something simple then yes, however with a more complex problem it may be better to speak to an advisor.
26. it will although currently its not the easiest system to follow and find what I need
27. It will make thing happen faster and more efficient
28. Most likely they will help consumers using these services, but at what cost? ££££
29. Most of the applications I use are already available on line
30. My dealings with the agencies referred to in this consultation are as an employee of DSA, rather than as a customer. I cannot therefore comment on this from a customer's perspective. However, as an employee, I am supportive of the move towards digital services as this improves speed and efficiency of delivery, whilst reducing costs. Digital is the modern method of transaction, which will become increasingly the case over time. I fully support the government's wish to embrace its possibilities, both from a transactional and social media perspective. My only reservation would be for those without access to digital services, normally through lack of funds. Alternative methods of interaction with government services should be available for the small number of people who need them.
31. No (x9)
32. No as online access is not always available.
33. No from a vehicle examiners point of view my customers want to be able to speak to me not a call centre.
34. No I prefer to talk to a real person.
35. No, the transport industry is governed by complex ever changing legislation, there is no substitute for either a voice on the phone or face to face dealing and advice.
36. No, this will make renewing licences, changing addresses on licences, etc more difficult for my family, as my parents, in-laws do not use on-line services, preferring direct contact, or



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post.

My children, who are young adults, also have concerns about large amounts of their personal information being constantly used on line and are very wary of doing so, and feel there is no choice. Even secure sites have had problems with security.

37. No. As Above

38. No. There are many instances where being able to talk to someone on the telephone or face to face are essential. Being purely online will not be good enough .

39. No. A face to face service is always more friendly and can assess the issues to hand

40. Not generally as I prefer to deal with a person.

41. Not really - still excludes a large amount of people who do not have access to the internet or who prefer to deal by phone. Should not be aiming for exclusivity - that excludes many people.

42. Not really.

43. Not really. What about people without access to the internet?

44. online delivery of services will assist on occasions but being able to deal with a service provider on a personal level is sometimes of benefit

45. Personally, I am more than happy to transact with the Government via 'existing' means (i.e. telephone/post), however I appreciate the benefits of making these services available online (e.g. 24/7 access etc). I would urge the Government to offer online services wherever reasonably possible, but bear in mind that a significant proportion of the UK population may not want to, or be able to access such services online. I believe it is therefore essential that telephone and postal services continue to be offered alongside online services.

46. Possibly, but what I've used so far has worked very well.

47. Probably

48. Routine tasks can be handled Ok online. However if you have a problem that is out of the ordinary will there be enough call centre help available to solve my problem?

49. since the world is moving further and further into the technology age, it would be a lot easier to have all the features required online, as this will speed up any service required and keep us the customer very happy as we will not be waiting weeks for certain documentation. However to the people who do not have access to the latest technology they should still be able to rely on the old methods via post but have the service improved so they are not at an unfair advantage of waiting longer.

50. Straightforward bookings/applications will be of assistance but it is necessary to provide a well informed telephone resource for queries.

51. The ability to access online issues remains a concern as speed and availability often creates problems or is unavailable in certain areas of the UK.

52. The current balance of digital verses paper transactions is easy to use, well understood and secure. Huge numbers of customers are unable/unwilling to do more digitally.

53. The majority of my contact is on line as customer based contact has unfortunately been removed; this has taken away the "face of the agency" and have contact only with a voice. Face to face customer service is very important

54. The provision on online or digital services will help greatly providing its not the usual government fiasco with providers.

55. There has to remain a balance of online and alternative delivery of services. Customers should have a choice

56. These will not help enough people. You are relying too much on computers instead of people. Not everyone has good enough knowledge of a computer and far too often the system that the DSA uses is not good enough for quality and efficiency.

57. to be seen

58. Unlikely - Could lead to less accountability

59. using online is fine, but sometimes you need to speak to people face to face, theres nothing more annoying than having to deal with a computer when youve got questions you



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- need answering. This should be alongside the services we have at the moment not instead of.
60. We are still not a completely computer literate society.
61. YES (x20)
62. Yes - although some thought needs to be given to those customers who do not have easy digital access if any at all.
63. Yes - but in only in so far as the technology can cope with the demands. I would argue that this requires a cross DfT IT strategy that recognises the starting point i.e. all agencies/the department are on different IT platforms and different IT packages.
64. Yes - supported. However, this needs to be much more than just replacing paper with e-mails and websites. This needs to true reform of what we do - and in some cases the regulation around that. By way of an example it was interesting to see that an example of a modernised service being delivered was a DVLA on around cherished transfers. Whilst I'm sure this will be a good service its unclear if all of the current clunkiness and cost of unnecessary process are being resolved. - for heavy vehicles this service must cross VOSA and DVLA boundaries as if a heavy vehicle changes its registration mark the owner is currently required to notify VOSA - and in the case of an HGV pay for new plating certificate. This really is a good example where we haven't internally challenged ourselves enough - the services must go across agency boundaries if necessary, but we must re-engineer process and get rid of things that add no value.
65. Yes - use of digital services is quicker, more efficient and accessible 24/7 - provided of course the appropriate infrastructure and services are available to maintain systems and services .
66. yes - when we made test results information available on line I believe this helped heavy vehicle operators become more compliant.
Our on line test booking system has been very popular and successful
67. Yes as it makes it more convenient and easier to deal with. Getting rid of paper licences and tax discs should be done ASAP as these are unnecessary in this digital age
68. Yes but I am concerned that they will isolate others. My mother for example is 60, doesn't have internet access or a computer and would struggle to access these services as digital access is usually at the cost of face to face access.
69. yes by allowing me to get to information quicker so I can provide a better service
70. Yes by putting services on line will make my job easier .as information I might need will be more accessible.
71. Yes digital does assist. On-line services are always a good means of contact - however it is also important to have a 'human' to explain things face to face/letter or phone.
By removing more services makes procedures more complex as most cases are never straight forward and cannot be dealt with by selecting yes/no boxes or telephone options.
I suggest that you look into how many complaints relate to the public not actually being able to discuss their 'matter' with.
It is also not good for the economy to make more people unemployed and out of work.
72. Yes I believe a better online service TO THE QUESTION, Also a combined all services one agency is the future, Reducing costs, Working together as one to be more efficient thus providing a better service, Reduction in land and properties Remove jobs that are not essential. Thus saving costs, But employing good staff who can do the job.
73. Yes I use the HGV online booking system and would advise anybody to use it as it's simple and affective.
74. Yes it will help me, but there are a lot of people who do not have access to the internet.
75. yes provided that there is also backup in the form of telephone customer service to respond to less simple queries and that the digital services are user friendly (eg. easy to navigate to find what you need - this is often not the case at the moment) and well designed.



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76. Yes provided they are fast and reliable and have the appropriate security built in.
77. Yes when used.
78. Yes will provide choice and reduce cost, but note that some customers may still prefer to use the phone despite the benefits of online
79. Yes, although the retention of some form of call-centre would be preferential for dealing with more complex queries. Also, assisted digital requires inclusion in this.
80. Yes, any services that are seen as cumbersome or time consuming are out dated and becoming digital or able to use any of the services online makes much more economic sense. Simple tasks like Taxing your vehicle or applying for a driving licence are all so much more convenient.
81. Yes, anything online would be a help as I feel we are using and relying on computers more each day.
Especially any thing to do with car tax, licences, MOT's. support removal of counterpart licence and getting rid of tax disc and adding it to petrol thus making the people who use the road more frequently pay their share
82. Yes, as long as the online systems are clear and easy to use.
Consideration should be given to maintain access to services for those who cannot use the digital services.
83. Yes, as long as the services are easy to use and customer-friendly. As a customer, I would like to think that customers' opinions and input are sought to build into any new services. Customer journey mapping should be integral to everything to identify barriers and further opportunities users of the service might identify
84. Yes, but I am computer literate so can easily grasp new ways of using the internet/computers in my day to day life. My concern is that the people who are not computer literate will not be able to access this consultation so their views will not be taken in to consideration, and it is these people that the proposed changes will affect the most.
85. Yes, however there is a fundamental need to overhaul related primary legislation which was enacted in the pre-digital age. For example, online VED applications are inconsistent with the retained obligation to display the tax disc - which may not arrive for days. There needs to be a temporary disc arrangement.
86. Yes, I believe so, providing expert help is still at hand to advise on complex issues. As providers, we must also remember that the services we deliver are rooted firmly in many years worth of deep technical knowledge. What is obvious to us may be quite the opposite to the occasional user of our services. As the manager of a large driving test centre delivering around 300 category B tests per week, I am frequently told by end users that for bookings issues, we lack a personal "Face" and that we are not easily accessible when complex issues require a conversation to take place. We must be careful not to exclude the non-I.T. familiar or even other groups who may have trouble understanding written information.
87. Yes, it will save time and money.
88. Yes, more needs to be done online. For example the cherished plate transfers procedure.
89. Yes, savings can be then be passed to customers and employees.
Less time consuming, quicker service.
90. Yes, should provide a quicker more efficient service.
91. Yes, the DVLA on line service for taxing your vehicle on line is great, it saves me time fuel etc by not having to go post office. I would like to see all my interactions via a web portal, storage of MOT certificates etc V5. etc
92. Yes. (x2)
93. Yes. I will be made redundant.
94. Yes. As long as sufficient bandwidth is available wherever I am when I need to deal with you, and as long as the service is procured and run in away that gives the best value.
95. you must keep a human contact point as not all people are computer aware



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. Although continued liaison with the industry is a priority an independent body to monitor and identify standards has to remain a priority.
2. As it is such a small agency it makes sense to see it amalgamated into another organisation, I wouldn't like to comment on which one it should be.
3. Consumers should understand the relationship between the price of new vehicles and the services VCA have provided to ensure that their operators and all other road users are kept safe.
4. Give the VCA the option and flexibility to react to the pressures of a growing business and it will naturally use the talent in the staff to expand and bring in more money for the treasury and the UK economy
5. I am not a direct user of VCA With a 95% satisfaction rating from its customers it shows that the agency is giving the customers what they want. Although digital access and modernisation can improve the service given I cannot see the need for an outsourcing option.
6. I do not agree with the breaking up of VCA or outsourcing its functions.
I am supportive of the Government commissioning from a mutualised delivery model as this will transfer real assets from the state to the workforce giving staff a very real stake in the organisations growth and success through improved delivery of Government ambitions and services to its customers.
7. I have few dealings with VCA so do not feel able to comment.
8. I have no experience of dealing with VCA. My only comments would be the critical importance of ensuring that any potential outsourcing be policed very tightly indeed. Integrity and consistency are key and it is important to note that this gets exponentially harder to achieve with increased numbers of providers.
9. I think all agencies should be left as is, Government control is important to maintain a standard. Maybe the ministers should look at delegated driving examiners for example and compare their pass rates with DSA staff then ask themselves why there is so many accidents. Also speak to VOSA staff who work on customer sites as many are unsuitable.
10. I understand that VCA is by far the smallest of the DfT Agencies, and the see the case for it being merged into one or more of the others. I cannot see how mutualising or privatising VCA will bring any benefit to the UK economy, as the work currently undertaking by the Agency will need to continue so as to meet legislation/safety standards etc. Commercial bodies are unlikely to offer significant savings over the public sector, and I would be concerned about conflicts of interest with one commercial body potentially approving/rejecting the products of another.
If a change to VCA existing status is required, I would urge the Government to go down the joint venture with another Agency or a merger with another Agency route.
11. I'm not familiar enough with this service to comment
12. It is impossible to comment when options for new models for VCA business are not adequately explained in the consultation. Therefore my view is that VCA should remain part of the public sector, delivering an impartial, cost effective and consistent service across the country. The status quo is preferable to uncertainties and dangers inherent in mutualisation, joint venture or outsourcing. I suggest consultation on this point is fundamentally flawed.
13. It should not be done in a way that anyone loses jobs or too much upheaval in the way cars are manufactured and sold.
14. It should remain unchanged



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15. Joining with VOSA or possibly a single agency to cover ALL the required aspects so its easier for the public. i.e most public have only ever heard of the DVLA
16. N/A
17. No (x 27)
18. no - I do not sufficiently understand the VCA business to provide an informed opinion.
19. no its fine as it is.
20. No specific comment
21. No suggestions.
22. None (x3)
23. Remain as is.
24. Remove their monopoly on accrediting or auditing organisations to ISO standards.
25. Scope for some integration with the MoT part of VOSA, as there is overlap in concepts.
26. should not outsource or privatise agencies that have connection to the issue of legal documents as this can lead to fraud and corruption
27. Some of the services that it undertakes may be able to be undertaken by vehicle manufacturers.
28. Streamline the existing service rather than overhaul, go for the most cost effective option, especially if this means retraining rather than recruiting.
29. The final model needs to offer the optimum value possible, whilst guaranteeing that it cannot fail and leave the customer without a service. I would worry about leaving it to rely on outsourced companies or run as a mutual that could conceivably go under.
30. The ideal department to merge the VCA with would be the Vehicle Licensing side of the DVLA, this would put both aspects Vehicle Licensing under one roof making them more streamlined and efficient
31. The work VCA do has some synergy with work of VOSA and both are based in Bristol. There are opportunities to better commercialise the knowledge and expertise through some form of joint venture – private public partnership. Any greater commercial freedom would have to go alongside freedom from political intervention. Would suggest a public sector mutual organisation similar to MyCSP. This should be subject to independent evaluation of the model and use of suitable advisors to put forward an appropriate business model for consultation. It is important that staff have a significant stake in the business and can stay in their existing pension scheme. Great care need to be taken to avoid the private sector partner over gearing the venture (risking insolvency) or selling it on after a few years (making a big profit at tax payer expense).
32. Type approval of vehicles and components is a vital element of road safety and must remain under government control.
33. VCA should become a mutual or not-for-profit company.
34. VCA works well being given greater freedom from Government security and policy restrictions. Allowing them to keep that freedom or move closer still to a commercial model is a good thing.
35. VCA,VOSA,HIGHWAYS AGENCY,DSA,DVLA,SHOULD ALL BE TOGETHER,REDUCING COSTS,AS IN A OUTSIDE INDUSTRIAL PROVIDER,TO BE PRODUCTIVE AND EFFICIENT IN ORDER TO SURVIVE WITH TODAYS ECONOMY.
36. VCA's range of services seems to be too small and disparate to be a viable single entity. It should be merged with VOSA it seems to me. Both organisations operate in a commercial environment and there is a synergy between services.
37. Whilst not having been directly involved in the agency for some years my understanding is that a great deal of VCA's success - and its current contribution to the UK economy - is achieved through its near-unique selling point of being a government organisation - with the associated badge of independence that goes with that. Whilst being a part of the civil service may arguably constrain the approach to business that VCA have - this must be balanced against the dangers of loosing its unenviable reputation for fairness and



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independence. I have yet to see any compelling arguments for change, other than the perceived benefit that may be had from reducing the numbers of civil servants in the country! In terms of VCA's range of services - it seems appropriate to restrict VCA to doing what it does best - operating predominately within the automotive industry

38. Although continued liaison with the industry is a priority an independent body to monitor and identify standards has to remain a priority.



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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. adding many different test centres may have an impact on the consistency of testing
2. Again so long as the technology and infrastructure can support this. It's a good idea but making it work in an efficient and effective manner will prove challenging.
3. allowing 3rd parties to conduct driving tests will destroy the integrity of the test and make it easy for criminals to buy a pass certificate, this will raise the death rate due to traffic accidents which has all ready risen due to relaxation of the standards
4. Already a driver so I am not personally affected
5. Any service provided must benefit the customer, not the organisation delivering the test
6. Application and identification as best we can, it seems strange that we can be tested on-line but still have to carry paper documents for test.
7. As a business - potential risks /impacts regarding day to day engagement activities and operations e.g.
 - will there be an impact on day to day operations if required to notify DVLA of driving test pass/failure.
 - will private sector involvement introduce additional fraud/security threat/need for additional business links/additional costsIn addition there may potential opportunities to DVLA to provide additional services to its customers trough improved online links with test centres/provide information about locations for tests - move towards a one shop stop type service.
8. As a customer it would not, at the present time.
9. As a driving examiner I am very concerned about the future integrity of the driving test as it should be all about road safety and not private enterprise. I believe keeping the test centres offers the candidates and the instructors the best service and test day experience.
10. As a driving examiner it may help the customer but it must still reflect a thorough and proper test of the competency of the candidate
11. As a DSA driving examiner and test centre manager taking the test to the customer appears to be a logical step. My only concern is the sites we choose and the partners we work with. The use of public buildings such as fire stations and colleges are ideal but private locations could make the test appear to be profit led. Example - are Halfords going to bombard candidates and ADI's with products and services.
12. As a parent of young people learning to drive and one who has just passed their test I prefer the emphasis on their and other road users safety, rather than a test to be as close to home as possible.

I support the Driving Standards Agency's Safe Driving for Life and personally feel Pass Plus and the previous Arrive Alive type schemes could be promoted more to achieve this aim.
13. as above
14. As an employee of DSA, this will provide a better service to our customers but we must ensure the integrity of the test by making sure the areas used are suitable for test purposes.

Cutting back on our massive estate would make massive savings, however this has to be weighted against the added cost of deploying examiners to customer sites.
15. As an employee, in my opinion it would devalue the test considerably, both in the service provided, and in the overall image given out to members of the public.
16. As argued above, DfT's current policy adversely affects customers



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17. As we don't have enough staff to cover the current areas, and if your going to different places than other members of staff then what happens if your on sick no one can cover the slots as they will be else where.
18. bringing the driving test closer to the public will save the customer less time off of work and so wouldn't lose much in wages and also less downtime for the business so companies would save money
19. By having more sites for driving tests it would be easier for people to get to and maybe more in there local area so they may not need to take so much time off of work so they lose less wages and the company they work for would lose less downtime or loss to there company.
20. Car tests provide a greater choice for customers however the closure of GVTs means that customers are being disadvantaged as few have the necessary area for the manoeuvring exercise to be able to set up as a customer site and therefore have to travel further. This results in higher costs and more carbon emissions.
21. Cheaper running costs of instructor's cars.
Closer for candidates who have to work to allow less time taken away from work place.
Compulsory opening of test centres on Saturdays for convenience to the general public.
Test still conducted by CIVL SERVANTS to protect the integrity of the test and the status of a Driving Examiner.
22. Current ADI
23. Current situation provides fit for purpose test centres with complete privacy. These facilities do not currently exist within the private sector.
24. don't know
25. Driving tests should be looked at as serious examinations. This is a big impact on road safety to bring these to colleges and other public locations. There should be dvla buildings to go do your test at, the test itself should not be altered or given to any third parties to complete. Maybe a more streamline way of doing the theory test, but definitely not the practical side of the test.
26. DSA is already undertaking a Taking Tests to the Customer project. However, current provision of driving test centres is generally adequate; based on distances candidates to travel according to population density. Meeting candidates in public car parks and performing manoeuvres therein is unacceptable to other car park users. It is a public benefit if the current VOSA estate is maintained and available to deliver driving tests.
27. Easier access in terms of distance to travel would not have a direct personal consequence as we already live fairly close to relevant test centres. It could really benefit many who have a long way to travel to access the services. Integrity must not be compromised.
28. Easier to get tests and quicker more efficient service.
29. Examiners will be more isolated and less easily contactable. Access to many customer sites is limited by the amount of car park space available which is often shared by other commercial organisations. DSA does not have the right to display policy information at customer sites so information is less visible.
30. Freedom and availability
31. From a delivery perspective, I am honour bound to note that test integrity is at risk of being compromised as we spread our geographical areas. Some simply are not suitable for testing as route content may be too basic, or conversely too hard. Also, whilst on paper the use of (currently) free third party premises may seem good business sense, travel and subsistence must increase as a result of this customer focussed provision. I am pleased to see customers being placed ahead of operating costs however must claim to be surprised considering our current austerity led



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economy.

32. greater flexibility
33. Greater risk of abuse to DSA examiner staff
34. However we need to ensure that the credibility of the system is not jeopardised, I am not in favour of the repairer self testing, however there is scope to change the test
35. I am a Driving Examiner and employed by the DSA to conduct cars, Motorcycles and the ADI pt2 & 3 tests. I also conduct the check test (continued ability) of Driving Instructors. Allowing me and my colleagues to carry out these tests closer to home is a fantastic proposal. I live in Stamford (Lincs) which lost its Driving Test Centre over 15 years ago. Bringing it back to Stamford will help reduce costs to the customers of driving schools who have to charge extra for their driving lessons to cover the costs of travelling to the nearest driving test centre, Peterborough which is 17 Miles away. My partner is a driving instructor and she not only finds this extra cost a burden on her business but also a big inconvenience.
36. I am a Driving Examiner so the implication may be that I have to adapt to a new working environment.
37. I am keen to hear if you are seriously considering placing the driving test of any category into the hands of the private sector. I cannot believe any Government would contemplate putting the future of our drivers in the hands of shareholders who will by their very own nature want a return in financial terms.
May you be reminded of what happened with the railway and G4 to name a few. Any private investor would clearly want financial gain and what better than simply raising the standard to create more failed candidates and so therefore create more revenue.

The present system is not without fault but is trusted by those people affected such as Driving Instructors and candidates sitting their driving test. Most people think the job of a Driving Examiner is simply to record faults on a piece of paper and pass or fail them. This could not be further from reality. Examiners are highly trained assessors. Many Driving Instructors would say they could do the job but this too could not be further from reality.

I was a Driving Instructor for over 8 years before becoming a Driving Examiner, a post I have held for 25 years.

When I first joined the then Ministry of Transport the whole scale privatisation was circulating and the same fear about the loss of integrity was eventually considered and the idea was scrapped. The Driving Standards Agency conducts itself in such a professional manner it could never be matched without loss of integrity with any private organisation whilst money is involved.

The 'not fit for purpose' or 'driving costs down' phrases are just a reminder of how very wrong this Government is and is a con to create more part time positions in jobs to help this Government get out of a mess created by the Banking section. It will never be seen as putting the customer first because the accident and death rate will without doubt rise through poorly trained Driving Examiners that would be answerable to their employer, whoever that would be and never be trusted again.

38. I am supportive of the approach that reduces the Government owned estate.
I have concerns regarding who would conduct the test and believe that companies carrying out their own driving tests would be seen to remove the impartiality that is important to reassure the public that only people who deserve a license receive one. Providing assurance that 'authorised providers' are conducting tests to the required standard will be bureaucratic and introduce more red tape.



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39. I am writing this reply to the MSS consultation taking place with regard to the future of the DSA.
In many of the replies given by xxxxx (personal details redacted), she held up the testing of the theory test as an example of how testing can be placed with outside agencies. However, this is not a correct or relative comparison to draw because the theory test is a computer based test to which the staff has no influence on the result.
The driving test examiner however, does have a large influence on the result of the test
40. I believe it depends on who is carrying out the test and where it is being carried out from. We need to consider traffic flow from retail parks, especially on the run up to Christmas and other major events. We also need to consider insurance risk if operating out of private car parks and the integrity of any office facilities used by Examiners in debriefing any candidate and receiving, filling out and storing sensitive paperwork.
41. I can see the potential savings in carrying out driving tests close at the customer sites, ie large training providers, fleet operators.
I can also see a conflict of interests if the training providers also carry out the driving test, business trade and increase market share by providing stats on success rates, therefore adding pressure on passing candidates rather than being impartial and independent.
The need for a high level of quality control will offset any saving in staff costs if the driving examination was to be carried out in the private sector.
42. I do not feel it would be good to allow private sectors to get involved. I do think it is good to use customer sites and bring test closer, however the test is managed and delivered well by DSA and see no positive outcome if it went to a private sector. The negatives of yet more public sector job losses and drastic changes in terms for anyone involved in delivering the test would be a big negative impact.
43. I feel it is important to have official independent driving test centres to prevent familiarity and conflict. I imagine examiners will be asked to work in varying offices often on their own, has anyone thought about their safety, cost of them travelling to various sites as many examiners complain at running costs of vehicles.
Most people have heard of instructors that will supply pass plus certificates for a payment without the required hours/situations, that is why we need official government staff that aren't corrupt.
44. I feel the location the test is delivered from will not have an adverse effect on me, or the integrity of the test itself, as long as the driving test examiners are still impartial (civil servants). If conducting tests from a location closer to the customer the reduced mileage, fuel consumption and consequently harmful emissions are reason enough alone to make this change a change for the better.
45. I have already taken a number of driving tests in a variety of groups. I do not envisage taking further driving tests thus any changes in provision will not provide me with a better service
46. I live in a rural area so moving the location of the current services could make matters worse or better! I certainly wouldn't want to set off on a driving examination in a very public area where your nerves would be increased and there is a reduced element of privacy.
47. I think it will jeopardise the validity of the test- the same way that private bus/lorry companies that provide tests for their employees. The drivers are not as competent as someone who is dsa tested.
48. I think that bringing the test to the customer works in some respects....ie. if the customer has to travel 20 miles or more.



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- I don't agree if a DSA test centre is within 20miles.
49. I think that the progress made in customer relations would be beneficial to the agency.
50. I will affect me as an employee
51. I work as a driving examiner and believe that we should be making it more accessible to customers, however it has to be remembered that standards need to be maintained as we are seen as a professional body. Safety of examiners must also be considered when taking testing to customers. I do believe that there are some dsa test centres that would need to be kept as the demand is strong and customers want to have this facility.
52. I work for the DSA and am unsure how it will affect my way of working. Will we have the IT support and facilities? Will it be more stressful?
Working in isolation surely there are more health and safety implications, and concerns about working alone or in small numbers in none DSA premises, with none DSA vetted co-workers.
53. I would be concerned about the integrity of the test if delivery was not done by a public body; but there is no reason why examiners shouldn't work out of third-party premises and be totally mobile within a geographical area.
54. If the driving test was moved closer to the customer as long as its kept as a gov agency I think this will be fine.
55. Improved accessibility & availability
56. In rural areas I can see that there is an advantage to taking testing closer to the customer by the use of occasional sites and it makes perfect sense for these sites to be provided by external partners. However the choice of these partners is vital to maintaining the credibility and importance of the driving test. For example attending a fire station is far more credible that meeting an examiner at a supermarket. What sort of road safety message is sent out by delivering tests from a retailer of boy racer accessories such as alloy wheels, spoilers, go faster stripes and booming car stereos? Is it suitable for the DSA brand to be partnered with the Ripspeed brand of Halfords? What does that do to the public perception of the driving test?
In urban areas there are little or no benefits to candidates where travelling distance to test centres is only marginally reduced. I think if examiners are working remotely in small groups in the longer term that will have a very adverse effect on the performance and development of examiners and will lead to a less able and unmotivated workforce which will a negative impact on service delivery. A huge amount of examiner development takes place from them working together and being able to discuss issues arising from tests. This informal development is important to delivering a uniform standard of tests.
If the real motive behind taking testing to the customer is about reducing the cost of estate why not look to reduce central property costs. Do we need administration centres in costly city centre locations or could they be re-located to more cost effective out of town business parks?
57. Is there a problem to be solved by this measure? For example, are driving test centres so sparse as to cause an economic problem? If so is this a general or localised problem? If it's only problem in, say, the Hebrides, don't go to the cost of providing a solution nationwide. Are there substantial benefits to the hosts of more localised venues (eg access to the ADI market), and do these cause any dis-benefits or costs to customers? I don't see the need, nor do I feel that there is enough analysis to be able to judge these ideas.
58. it could actually take it further away if you were to close my local centre; which has already happened before these changes were proposed
59. It may be easier to get to your test and reduce the travel time to known test routes however it encourages people in only having local knowledge of their area and



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- promotes ignorance of how to perform in different environments and under different systems. Under the current system you get a better experience whilst travelling to the test areas using different roads. If you bring a test to an area without a 60 road or busy town how will these people cope when there is a need to visit such places.
60. It minimises the cost to candidates and instructors in respect of preparing for the test. Makes my job as an examiner easier if people are happy with a varied choice of test location.
61. It will no longer affect me as I now have licences for all categories needed.
62. It will provide more flexibility for customers in terms of the number of available test slots and testing locations.
63. It won't only concern is the integrity of the test and the security of the workforce and data as well as working conditions.
64. It won't affect me personally, but I think it's worth pointing out that this will both convenience and inconvenience different customers. Ultimately, some customers will go where there are tests available whilst others will wait for tests more locally no matter how long the wait.
Also, there should be no exploration of options to deliver the driving test through the private sector. This will put the integrity of the test at risk.
65. It would be much more convenient for me.
It would make the driving test seem less "formidable".
66. It would eventually lead to the closure of driving test centres.
67. It would make little or no difference to customer satisfaction or cost reduction because:
a) some of the proposed sites such colleges, retail premises etc do not lend themselves as test centres as access and congestion may already be a problem;
b) in some parts of the UK, inc suburban London where I took my test, there are already plenty of test centres close to customers
68. It would make no difference to me.
69. It would not as not customer
70. it wouldn't but as long as there is a clear central point of contact then the location can be arranged almost individually
71. It wouldn't I already have my driving license.
72. It wouldn't. However it would mark a major shift in the way the staff operate. It will be extremely difficult to get front-line staff (the examiners) to change their 'institutional mindset'
73. Less travel and down time.
74. Let the customer come to us, the way it always has been without any problems.
75. MORE CONVENIENT IN SOME LOCATIONS
76. More local options would make attendance easier. I am more concerned about the safety implications of allowing companies to conduct tests for profit as this will lead to lower quality testing and reduced road safety. As companies vie for market share it will only be a matter of time before managers demand that examiners pass more people to give higher pass rates than competitors thus increasing the probability of candidates using their company.
77. Moving away from current sites would be a waste of money, especially when the new motorcycle involved much expense.
78. n/a
79. No comment (x2)
80. No effect
81. None (x2)
82. Not at all
83. Not at all. I suspect that even as an employer, it would be likely that those wishing



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to take their driving test would still take a day off work to do it, or half a day. Given the level of nerves and how conscious they are of others knowing they might fail, taking the test directly from work premises might be highly undesirable. If there is research to the contrary then I think it should be made public as part of this consultation.

84. Not really with regards VOSA.
85. Only works if people actually take a test legally rather than paying someone to do it fraudulently or not taking a test at all but driving illegally instead. Licence is seen as a means of ID first and foremost which is why they are valuable. Would taking the test closer to the customer reduce the level of control on testing and licensing in general?
86. Relying on customer sites is a big risk, what happens when Halfords go bankrupt or decide to charge huge amounts of rent - the test fees would go up and the service availability would crash. The driving test must be run by impartial civil servants and must not become vulnerable to market forces. There are enough driving test centres to cover everyone, do not close any more.
87. Security of employees and paper work would have to be considered. But good idea if work patterns are not changed.
88. The core objectives of the driving test are:
 - a, to exclude from driving those who are not competent to driver safely and responsibly
 - b, to promote the training required to become competentTo these ends testing must stay valid, reliable and homogenous. The pressures to take testing to the customer must be constantly set against the quality of the testing process. Saving a few miles of supervised travel, which is itself a useful part of the learning to drive process, is not worth increasing the number of killed and seriously injured on our roads.
89. The driving test is already available at very many locations nationwide. So it would not affect me as a customer.

I am concerned for the integrity of the test being outsourced to the Private sector. As the private sector concentrates on profit.

And the test should be about Road Safety. It is a service to the public not a business.
90. The driving test is a product of which we should be proud. It is a recognised gold standard across the world. I believe that opportunities should be taken to improve access to that product where possible, provided that the integrity of the test is retained.
91. The driving test is already delivered close to customers/candidates - over 95% are within 30 minutes of a driving test delivery location, which appears to me to be a very acceptable distance for a test that is generally a once or twice in a lifetime experience. Pushing driving test delivery to more locations to meet assumed customer need will just make the delivery of these tests more costly, thus potentially increasing the cost to the candidate. It also threatens to compromise the integrity of the test, by increasing the number of driving examiners working on their own - this is not a positive move for road safety.
92. The driving test should be brought closer to the customer, but only to the point of hosting tests from other public sector or private sector premises.

However, DSA/DfT needs to consider carefully the perceived drop in customer service and care by using other premises that don't have adequate facilities. For example, nervous driving test candidates often need to use the toilet before their test. The reality is that they've been on a lesson immediately before their test. Many of the chosen 'taking testing to the customer' locations do not have toilet facilities. The test itself should still be conducted by a civil servant.



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93. The driving test should stay as it is and not go nearer to the customer. When they are full licence holders, they will not always be driving or riding on roads that they know. So why should their knowledge and skill of driving only be tested on roads that they may travel on every day of the week? This will mean instructors only teach them enough to get through their test and not a SKILL FOR LIFE. This is why young inexperienced drivers are being killed trying to do things that they have not been taught to do by their instructors.
- A Prime example is driving at high speeds after they have passed their test. They are not required to do so on their test, as we now accept 45mph in a 70 zone "if nothing is interfered with by the candidates". So instructors do not teach it !! It is not compulsory for them to do Pass Plus scheme, so most do not teach it. This can lead to disaster on a Motorway etc when attempting to drive at high speeds.
94. The DSA Estate and, therefore, its rent & rates bill will diminish. Unnecessarily prolonged delays for tests will be avoided.
95. The essential concepts of integrity of the test and uniformity of the test will be compromised by some of this. The examiner skills, and control / management of them, have been improved and honed over the years, and it is essential for road safety reasons to retain the current core methods. However there is huge scope for change in the peripheral activities. Locations (delivery points) are transient and incidental to the core skill, but the driving instructional business is a different entity, with the operational side being kept completely separate from examining / testing, but with an improved control regime in place. A diverse range of providers can work well for locations and instruction (as current) but the poor pass rate is a consequence of poor management of instructors - and this is only picked up by examiners. If a similar lack of control is allowed with examiners then only the subsequent rise in KSI (and associated costs of collisions) will show the flawed concepts.
- Uniformity and Integrity are the key concepts.
- HGV and bus testing are slightly different because a candidate will have passed a car test first, and obtained some road experience. An HGV test could be done in a different way provided the candidate first passes another car test just before the HGV test.
96. The geographical location is too remote. Bringing the test to the customer in parts of Devon & Cornwall would not work due to the rural locations. Practical driving tests in some of the remote areas would not work and would not provide a meaningful test. Driving on busy dual carriageways, A & B roads would not happen. Candidates taking tests in remote areas would not gain experience of driving in cities such as Exeter, Plymouth, Truro to name a few.
97. The majority of these proposals sound logical and clearly focused around improving the quality of service provided and/or reducing the cost of its provision. Moving to a model where the place of service delivery is far more flexible and designed to suit the customer sounds very sensible.
- In parallel to that it must therefore make sense to review estates requirements - clearly if more tests are conducted in other locations, then estates requirements must change. In recent years there seem to have been some strange decisions made across the group around estates - where surplus estate in VOSA has been passed to DSA - which has hardly fitted with an overall approach to reduce the group footprint. The group must focus on service delivery not owning unnecessary estate.
- Its unclear what is being proposed for private sector involvement in the driving test, and therefore difficult to comment in detail. However, whilst it may be possible to make a financial case for change - it would need to be considered very carefully to ensure that the quality of the test is not compromised - in particular in putting



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safeguards to avoid conflicts of interest. In particular it is possible that those organisations most likely to be able to deliver a testing service (and which would enable efficiencies to be made) may be those involved in driver training - and therefore could be considered to have a conflict of interest.

98. The plans are a little vague, however, the current process works well, and is scrutinised.
99. The test needs to be accessible to all, as long as the integrity isn't compromised.
100. These plans would not currently affect me in any way.

I support initiatives to offer an increased number of locations for driving tests, as this is something that has been reduced in my area due to Driving Test Centre closures. I believe however, that driving tests should continue to be administered by an independent body such as DSA, rather than by commercial organisations. My reasoning here is again concerned with impartiality, as how can we be sure that a commercial organisation will be impartial in passing/failing its own staff or those of a competitor? DSA does not stand to gain or lose a competitive advantage in such a way.

101. They must be delivered in a controlled environment to ensure the integrity of the driving test and road safety and using areas and premises that are not suitable will not achieve this aim. The driving test must also be free from financial gain.
102. This will be good
103. What will happen to driving to tests if the partners we use have to close there businesses like so many on the high street? You still need to have a permanent test centre where the demand is high.
104. While I can see the appeal in general I do have long term concerns about how the public will determine if the test is as impartial as has always been the aim.
105. Worry about data protection issues
106. Would have no real effect. Most people learning to drive would book a "double lesson" with an ADI and take the test in the second lesson. Location is not important provided it is accessible within the time for the "double lesson". Research shows customers are more concerned about the quality of accommodation than the location.

In principle this makes sense providing better customer service and less travel for customers. In practice most customers travel by car having a lesson before test and go up anywhere within a 30 minute drive. Customer research shows most customers are more concerned with the facilities on offer – rest areas and toilet facilities than where the test centre facilities are located. No market research has been done about whether customers would be prepared to pay more for a more convenient service e.g. Passport Office provide a premium checking and faster despatch service.

This means we will:

- look fundamentally at the locations where we provide tests and trial approaches which take these closer to the customer - agree
- pilot providing tests from a greater range of locations including from colleges, retail premises and other public buildings – agree: already doing

We're committed to respond more quickly and flexibly to changing demand, where this can be achieved without:

- threatening the integrity of the driving test- agree
- resulting in higher fees to the customer – depends on market research; this is pre-judging the market

Providing the practical test

We'll explore the options for providing the practical test, including options for private sector involvement and greater diversity of provision. We'll also consider other commercial and mutual options.



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Comment: The test needs to achieve a consistent national standard to meet EU legislation and any variation will undermine the integrity of the test. This could result in undesirable customer “shopping around” for a “perceived easier” test (similar to exam qualifications). There is a strong risk that the profit motive will compromise service quality (e.g. A4E). An independent test with integrity is best delivered by the public sector.

We're keen to explore all options that maintain the integrity of the test and high quality standards whoever is the provider. Comment: DSA is already working with other partners in delivering the test – for example, in Partnership with Halfords: see <https://www.gov.uk/government/news/green-light-for-driving-tests-at-halfords>.

Maintaining a consistent national standard is important and introducing different providers introduces a strong risk of a “race to the bottom” like qualification providers competing on how easy their exam is.

It is the job of government to set road safety standards and targets. It is necessary for the state to provide impartial testing services, free of commercial influence or interest, in order to deliver road safety. That means civil servants are best placed to provide those services while remaining accountable to Ministers.

We'll complete a review of our estate and model the current and future demand from our customers to develop a more optimal distribution of our sites. Comment: Agree but any changes will need to be done over time as most premises require long term investment in time, money and carbon reduction measures. There is a potential conflict between reducing the estate and providing customers more locations for the test.

107. would personally not effect



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

- Options for the delivery of HGV, lorry and bus test, including authorising others to carry out testing on our behalf in certain circumstances.
Authorise others with proper training to do tests
- A concern is expressed on reducing the standard of the HGV and PSV fleet, if an independent body is not allowed to continue to monitor the general condition. Although the industry has improved its standard and this can be measured via the general increase in pass levels, a concern has to be expressed on standards against profits. This is particular relevant under repair and maintenance contracts, that are capped to an individual budget and where individual high volume fleet operators have reduced maintenance contracts prices, based upon high volume fleet purchases.
- A difference of 15% in safety figures following delegated testing is a matter of concern.
- A large number of organisations have not realised the financial savings that the "ATF Strategy" promised, conversely they have only seen increased costs to their annual testing bill.
- A lot of work has already been done to take testing closer to customers - ie VOSAs ATF strategy. This work should be recognised and continued. I think it important that a core of strategic VOSA sites are retained - in those areas where ATF take up is insufficient and in those areas where there is customer demand for testing to be done at VOSA premises (as opposed to competitors premises)
- A major problem I can see with delivering HGV, bus and coach tests from a customers' site is the lack of alternative routes and the danger that instructors are able to coach candidates on a particular route from that centre.
- As a member of VOSA staff I would like to add my opinion to the ongoing DfT consultation on Motoring Services Strategy.
I fully understand that processes need to be streamlined and saving made wherever possible - at the moment some operators are required to visit 3 or 4 government departments in order to complete one process . This, I can see, does not encourage compliance and is unprofessional and wasteful.
I also feel it is necessary to work as closely as possible with private sectors in order to make the most of government funds and also to foster a sense of co operation and mutual respect between 'us' and 'them'.
At VOSA we have worked so incredibly hard to already establish these aims. We were ahead of the game regarding pay freezes and have spent the past three years working hard to successfully implement the ATF strategy. My station, Northampton, opened the first ever ATF at Truckeast Wellingborough and I have been dual rolling as an ATF project workstream leader and station manager (or local testing manager) for the past three years. ATFs have been my lifeblood and although not perfect, VOSA has learnt from mistakes, corrected procedures and now has a robust sturdy model in place for the future.
As such, I have some concerns about delegating too much responsibility for conducting the actual test to the private sector. My examination staff suffer pressure constantly to complete extra work and 'turn a blind eye' to 'minor' defects. The financial squeeze on operators is such that the difference between a pass and a fail may mean a private industry examiner gets to keep their job - or not. This is not pressure I would like to have to face personally.
When dealing with a disputed failure item last week, the operator said to me, and I



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quote, "when we are testing our own stuff this s**t won't be a problem - my lot will do as they are told".

Other operators may have genuinely good intentions but have a rogue depot manager or such financial pressure that the decision to send a defective HGV on the road with a pass certificate and prioritise the delivery over safety, keeping a customer's contract for now, is not an easy decision to make bearing in mind that that HGV may go on to kill someone.

The conflict of interest between profit and safety is not one that is easy to balance.

8. As a new Vehicle Inspector fresh from the Commercial vehicle industry, my thoughts on Private Sector Testing are thus:
 - 1, Road Safety is of the utmost importance.
 - 2, VOSA standards of inspection ensure vehicles in a dangerous or unroadworthy condition are not allowed on our roads at annual test and following roadside checks.
 - 3, By carrying out vehicle inspecting using VOSA staff in a controlled environment, standards of inspection and road safety are maintained and controlled.
 - 4, Criminal activity resulting from issuing non bona fide Certificates would totally undermine road safety.

Having worked in the Commercial Vehicle Engineering Industry for 35 years (25 as a Manager) , I can see how easy it would be for Commercial managers and Vehicle operators to cut corners and lower standards regarding vehicle testing. One scenario might be; a loaded two axle rigid vehicle is tested by garage "A" . Garage "A" has a commercial interest in the running of the vehicle. The vehicle fails the Test with no effort on the service brake on one wheel on the steered front axle. (this currently results in an immediate prohibition). The Manager of garage "A" decides the vehicle is needed across town within the hour and sends the vehicle out without repairing the fault. The vehicle is then involved in a fatal accident. This would not have happened if VOSA staff had tested the vehicle. In short, Vehicle testing should remain under the control of VOSA.
9. As a vehicle examiner in a rural where there are no big operators. my customers are very opposed to the idea of being forced to go to an ATF. They want things to stay as they are or even turn the clock back to when the test centres were able to answer their requests and bookings directly and not have to deal with call centres.
10. as stated earlier, already private sector PSV examiners in London have been convicted of fraud with regards the driving test the only way for the test to remain impartial and fair is for it to remain independent under government control
11. Being actively involved in VOSA's reformation plans, I found the comments in the consultation paper to be quite ambiguous and concerning. We are currently expanding our network of authorised testing facilities and awaiting Department go ahead on the pay and T's and C's. I think the idea of allowing other, private, individuals and companies to test would present a severe risk of abuse and possible corruption, not to mention resulting in a lack of consistency in standards and increasing the danger to motorists. Private testers will never be completely impartial or objective as there is no motivation for them to be so. We will deliver the flexibility and service necessary for our customers through the plans we have in place. Further dissemination of the roles will result in our roads becoming less safe.
12. Can understand why this would be done from an economic point of view but I would have concerns on the quality and consistency of testing. How would checks be maintained and what checks would be put in place to make sure independent testing stations are not cutting corners. Who would over-see the testing and act as a regulator?
13. Changing the way we test any vehicle will not change or affect road safety, the



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roads will still be the same under the current testing method. Yes we can test a vehicle more efficiently but the vehicles are tested every year to make sure they abide by our safety laws and keep us safe.

The one problem we have is the customer behind the wheel of the vehicle. Also the technology we use in the vehicles to distract us. What needs to be done is a driver safety training test.

Every year our highway code improves and the way we drive and read signs are different to what they were years and years ago, but experienced and non experienced drivers are not keeping themselves up to date with any of the new changes and this could cause confusion and even accidents. What needs to be done is every 5-10 years the customer needs to take a refresher test on the highway code and a short driving test. Cars need to be tested every year to be safe on the road so why cant we be tested to see if we are safe?

the tests would involve a short multiple choice question just like the theory test (as that test even expired after 2 years if you didn't pass your practical test, so what changes in 2 years of not passing the test to being 2+ years driving a car) to give customers a reminder of the highway code. then a short 30 minute practical test of manoeuvres and signals and speed (this could be done by the DSA in a private ground like police car training or a examiner sits in the car just like the practical test), as drivers on the road today are not concentrating not obeying the speed limits and are not using their indicators or looking and caring about others safety, this leads to accidents. if the drivers fail their test then they are not permitted to drive until they pass, just like a car is not allowed on the road or be driven if it fails its m.o.t. when the test is passed then they can drive again. This may not change the safety as people will go back to old habits, but it will lower the amount of accidents on the road today. the cost of the tests can be the price of a m.o.t.

14. Civil Servants have a code of Integrity, Honesty, Objectivity and Impartiality and VOSA staff have done very well to make the safety record of British roads great and there is a continuing improvement culture within VOSA. To allow the private sector to undertake heavy vehicle testing and put profit before road safety is a dangerous route to take:
 1. Costs for testing will rise
 2. The forward booking times for annual tests will rise but there will be no monitoring
 3. Vehicle operators will be forced to purchase other services to secure a test booking
 4. Some vehicles operators will receive a less favourable service than others
 5. Vehicle operators will have to pay competitors for inspections and their vehicles may have an incorrect testing standard applied
 6. There will be increased opportunities for fraud and corruption

For the sakes of all road users in Great Britain the annual testing of heavy vehicles must be kept in the hands of the public sector

15. Civil Servants undertake annual testing of heavy vehicles under the provision of the Civil Service Code, namely with Integrity, Honesty, Objectivity and Impartiality Should the proposal to retain few, if any, VOSA owned testing stations go ahead, together with allowing the private sector to undertake heavy vehicle testing then I believe integrity, honesty, objectivity and impartiality of the testing of the largest and heaviest vehicles used on GB roads will be fatally compromised. Looking at the model, and reputation, of the MOT scheme (and despite the efforts made by VOSA to improve standards), it is clear that profit and safety do not mix. Encountering heavy vehicles from EU member states (and beyond) that have privatised heavy vehicle schemes necessitated by the creation of VOSA's HRTI teams



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GB's road safety record is something to be proud of and is something that VOSA staff are dedicated to protecting and improving. The bottom line of moving testing to the private sector will not be counted in pound notes but in lost lives.

16. Civil Servants undertake annual testing of heavy vehicles under the provision of the Civil Service Code, namely with Integrity, Honesty, Objectivity and Impartiality. Should the proposal to retain few, if any, VOSA owned testing stations go ahead, together with allowing the private sector to undertake heavy vehicle testing then I believe integrity, honesty, objectivity and impartiality of the testing of the largest and heaviest vehicles used on GB roads will be fatally compromised. Looking at the model, and reputation, of the MOT scheme (and despite the efforts made by VOSA to improve standards), it is clear that profit and safety do not mix. Encountering heavy vehicles from EU member states (and beyond) that have privatised heavy vehicle schemes necessitated by the creation of VOSA's HRTI teams

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GB's road safety record is something to be proud of and is something that VOSA staff are dedicated to protecting and improving. I have seen the mechanical horrors and back room antics of those MOT station owners and testers that clearly joined the "MOT club" for unlawful financial reasons rather than legally making a reasonable profit. There is a far greater need for a haulier or coach operator to keep their vehicle on the road come what may. Therefore the increased risk to the general public of "ghost test results" (pass results recorded against vehicles never inspected) cannot be ignored. The Enforcement section of VOSA are constantly identifying rogue Operators (both UK based and foreign) who are quite happy to flout the current transport rules and regulations (tachograph and vehicle maintenance requirements). Going down the path suggested will only encourage them to take the next step and use their ill-gotten gains to secure the required MOT test results for their vehicles (x2).

The bottom line of moving testing to the private sector will not be counted in pound notes but in lost lives

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teams.

GB's road safety record is something to be proud of and is something that VOSA staff are dedicated to protecting and improving. The bottom line of moving testing to the private sector will not be counted in pound notes but in lost lives. (x21)

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20. Civil Servants undertake annual testing of heavy vehicles under the provision of the Civil Service Code, namely with Integrity, Honesty, Objectivity and Impartiality. Should the proposal to retain few, if any, VOSA owned testing stations go ahead, together with allowing the private sector to undertake heavy vehicle testing then I believe integrity, honesty, objectivity and impartiality of the testing of the largest and heaviest vehicles used on GB roads will be fatally compromised their is no Saving to VOSA at present by the act of part time closing or even total closure of stations. The cost to the PUBLIC have increased my running costs have gone up but my income is no different now than 5 years ago. I believe the TEST STATION SHOULD STAY AS AN OPOTION FOR THE SMALL OPERATORS it also keeps the team work healthy within TEST STATION TEAMS.

GB's road safety record is something to be proud of and is something that we at VOSA are dedicated to protecting and improving. We all have to drive on the roads ask the QUESTION WHO DID THE LAST MOT TEST?

21. Current delegated bus examiners have a far lower pass rate than that of DSA which could have a negative impact on road safety.
22. Currently there are many quality controls in place to ensure best practice, with government staff working with integrity. This is not guaranteed with future proposals.
23. Customer sights are a good move as VOSA sites are closing. Problems with future road safety as instructors and HGV bodies will "route bash" and not teach them to drive the vehicle further than the standard required to pass the test.
24. Designated examiners used on non DSA tests have, in the past, been found to have a higher pass rate than DSA examiners, so one could draw the conclusion that assessment standards are lower. Also employers have been known to pressurise designated examiners to pass more candidates.
25. Don't really no what is being proposed. If its flexible hours to suit ATF then "Yes" this is a good thing BUT if its to privatise Testing then I think this is a very bad thing. The tester would get pressurised to pass certain operators to stop their OCRS score being affected.
26. driving large vehicles should not be made easier it is a skill that should be trained to a high standard and then tested accordingly, the proposals will seriously impact on road safety; taking testing away from DSA will surely compromise the integrity of the test; there is no braking exercise to test candidates competence in bringing a large vehicle safely to a stop, this was to remove the need for sites to have the



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- required space, I suspect the removal of the reversing exercise will follow shortly so there will be no need for large sites from which to conduct tests, examiners will be meeting training bodies in service areas or supermarket car parks, private sector involvement will put company needs before road safety.
27. Fewer testing stations is reducing confidence in presenters for a fair, consistent and unbiased test.
 28. giving hgv/psv tests to the customer would be worse for road safety. customers are not interested in road safety they are interested in targets and bonuses. vosa staff currently are put under pressure for customer to receive passes at test when defects have been found. this is due to customers more concerned on operator compliance risk score and on target bonuses. test pass rates would be corrupted by customers testing their own vehicles examiners will be under too much pressure from employers. keep testing independent from customers and have a true reflection of the condition of the national fleet. we have the safest roads in Europe for a reason and that is having the vehicles examined and monitored by vosa.
 29. Good idea.
 30. I agree with the idea of taking the choice of test location to the customer allowing a much more flexible workforce and removing the burden of cost from the civil service but this should be reflected in the test fee. Benefits (incl cost to industry) need to be realised and shown publicly to demonstrate the improvements. The description of further options for the delivery of testing is too vague and if we are suggesting we move to an MOT model then we should be bold enough to say this. Whilst industry will always support greater compliance in truth they are driven by profit and loss and the two are a dangerous cocktail, they can work together but with very close scrutiny, this is where I believe the focus should be.
 31. I believe it to be vitally important that the independence of testing is maintained to protect the integrity of all driving tests and I cannot see how this can be achieved other than by using impartial civil servants.
 32. I believe that if HGV and PSV Testing were to be carried out by private companies there would be a drop in the quality of the Testing. If compared to the private car testing there are Testers and Testing Stations that carry out bad and fraudulent tests which ultimately have an effect upon road safety. Does the government really want this sort of thing to happen to these larger vehicles, which if released on to the roads in an unroadworthy condition would be fatal. VOSA currently manages the car MOT scheme so would it be a good idea to make the staff 'police' this scheme too.
 33. I believe that more convenient locations will drive up compliance. I want to see greater commitment to working with industry to improve compliance.
 34. I can see that there is a short-term cost saving to the public sector of the private sector providing sites. But I don't see from this document how the government will guarantee the continuity of service at the full range and density of sites for businesses and customers. At some stage down the line, who is to say that the cost of replacing sites that commercial interests can't make pay won't outweigh the savings made by reducing estate commitments now?
 35. I have concerns that inviting the private sector to test their own vehicles would lead to an atomisation of heavy vehicle testing and be viewed as removing the impartiality of the road worthiness annual test.
Providing assurance that authorised providers are conducting tests to the required standard is likely to be bureaucratic and introduce red tape. We would be transferring the cost and administration of training, authorising, administering. Payment and monitoring of test standards to an atomised set of authorised bodies and therefore the customer (the opposite of shared services).



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It is unclear how:

The costs and availability of tests (and associated costs) in less densely populated areas of the country (such as parts of Scotland) would be passed on or provided.

The range of other heavy vehicle related inspections ADR, TIR, London Low Emission Zone, etc. would be conducted or vehicles presented for prohibition clearance would be reinspected.

36. I have worked as a VI now for some seven years and previous to this approximately 30 years as an HGV mechanic /workshop manager I look at what is happening to testing and it concerns me the way we are going. I fully understand in this day of cutbacks to shut testing stations and work at ATFs it makes economical sense but where will it stop are we going to have more ATF stations than testers if so what is the answer to this problem, the answer is to train up presenters at ATF stations so they can do there own tests what a worry this is to road safety let me try to give you a example from my experience in the trade - say Joe Bloggs is trained up to test for his employer ABC Commercials he brings in a three axle DAF and tests it and he goes to his boss and says its fails on two broken springs and the offside brake not working and headlights out I will tell you what is going to happen the boss is going to say pass it and we will get the work done when the parts turn up and if poor old Joe Bloggs says no he will be told in no other way pass it or find another job if he has a mortgage and a family what is he going to do?

Whilst we are independent we have control over this problem I know you can say it works in the car world but a lorry is a bigger killing machine and I personally know vehicle safety will be in jeopardy. I pray that we will stay independent for safety's sake and I have already been told that these workshops don't want to employ us VI's as they want there own staff wonder why please excuse any spelling mistakes but I do get flustered and upset when I can see the way we are going it will be a sad day for all road user's if it goes private

37. I have worked for VOSA for 31 years in different capacities. I understand the requirement to reduce costs; however, the reduction in costs via movement of test locations is a benefit to the larger operator but is having a negative impact on the smaller customer who has less of a voice or impact on ministerial decisions. To move testing away from a public sector provider would have a negative impact on road safety.

There is no doubt in my mind. Through experience I have evidenced that the haulage and PSV industries are commercially driven. Decisions based on whether a 44 tonne vehicle or passenger carrying vehicle is fit for road use must be made by an independent body.

38. I still believe that the commercial pressure put on 'Delegated examiners ' would mean that the test would not be impartial, therefore a greater risk to the public could be the result.
39. I think the testing reform will be good as long as it stays as a government agency. Due to looking at the car scheme everybody know where you can get an easy MOT and your enforcement activities would go up a lot if it was tested by private customers as this has been found in the car industry. But moving the tests closer to the customer sounds good.
40. I was working as an approved driving instructor in the West London area when in-house bus testing was rolled out. I witnessed a dramatic and very obvious drop in the standards of bus driving, resulting in numerous accidents. I had contacts in one particular bus garage located in Hanwell W5 and they openly admitted the conflict of interest they faced when their business demanded a significant rise in operational drivers and delegated examiners were coming under pressure to go "blind" to various shortcomings. I know of several delegated examiners who held



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firm to the road safety missive but they were rapidly moved out of operational testing and eventually out of the job by their operational management. Eventually, seeing a massive rise in fault incidents, forced a massive retraining of drivers who it is reasonable to assume would not have passed a truly independent test of their bus driving abilities. Such clear and obvious conflicts of interest cannot be allowed to occur. I believe it is politically perilously brave to risk such a compromising of road safety. With recent direct experience of fraud inherent in the post test lorry and bus CPC requirements, I have concerns about how private providers can be policed effectively before the KSI's tell us we have a problem. I suppose ultimately it comes down to how serious government really is about road safety. Full independence of all testing provision, whether on cars, bikes, lorries or buses must be maintained.

41. I would be concerned about the integrity of the test if we use the private sector to asses without the current monitoring we see in the public sector.
42. If a private company is conducting tests there priority is profit not road safety.
43. If MOT for cars works in the private sector then there is no reason why it wouldn't work for this group of vehicles.
44. Integrity and uniformity are again the key matters. With too much private sector involvement there is scope for specific targeted teaching (i.e. teaching the route). However the HGV and bus test is essentially testing additional skills, and there should be no problem with this provided every HGV and bus candidate passes a repeat of the car test, in a framework similar to the Part 1 and Part 2 of the motorcycle test.
45. Integrity of testing is paramount.
46. IT ALL DEPENDS ON LOCATION AND AREA.
47. It is believed the true cost of your plans has not been effectively scoped out. Getting testing closer to the customer is not achievable for all customers. Therefore this strategy does have a major additional cost implication for many vehicle owners requiring heavy vehicle tests. Furthermore it is not believed that the true staffing costs for testing at third party premises has been compared to conducting testing at VOSA sites. Additionally it is not believed the policing and quality assurance of these schemes is effective for none VOSA sites, based n what happens in the private testing scheme. Therefore your proposed changes require extra resources and policies to mitigate risks regarding the integrity of these schemes.
As a taxpayer I invite the Government to make much lower level efficiency and performance improvements. These can be achieved through a change in the culture of organisations like VOSA where the staff would effectively be consulted and empowered on change using such tools as Six Sigma and Business Excellence. By using the ideas of staff on the coal face realistic changes to everyday practices and policies can be made for the better.
To summarise Civil Servants undertake annual testing of heavy vehicles do so under the provisions of the Civil Service Code, namely with
Integrity - putting the obligations of public service above personal interests
Honesty - being truthful and open
Objectivity - basing advice and decisions on rigorous analysis of the evidence
Impartiality - acting solely according to the merits of the case and serving governments of different political parties equally well.
Should the proposal to retain few, if any, VOSA owned testing stations go ahead, together with allowing the private sector to undertake heavy vehicle testing then I believe integrity, honesty, objectivity and impartiality of the testing of the largest and heaviest vehicles used on GB roads will be fatally compromised.
Looking at the model, and reputation, of the GB light vehicle testing scheme (and



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despite the efforts made by VOSA to improve standards), profit and safety does not mix. It would be criminal to move the heavy vehicle testing scheme down the same road.

The examples of EU member states (and beyond) whose vehicles operate in GB necessitated the formation of the HRTI teams is a lesson on what happens when privatised heavy vehicle testing (and little attention to further enforcement activities) is allowed.

GB's road safety record is something to be proud of and is something that VOSA staff are dedicated to protecting and improving. The bottom line of moving testing to the private sector will not be counted in pound notes but in lost lives.

For all our families sakes keep heavy vehicle testing in the hands of the public sector.

48. It is essential that testing remains independent of the site operator. It is unrealistic to expect testing of commercial vehicles by a competitor to not lead to accusations of bias, competitive advantage for the site operator and/or drifting of sensitive information between competitors. I frankly doubt that Eddie Stobart will want his trucks tested by Wincanton or vice versa

49. It should be the template going forward. There are more than enough private training bodies with more than adequate facilities around the country. The template should be that the examiners go to them for testing - but still remain centrally employed by DSA/DfT

50. Keep the hgv test with vosa dont let it be privatised

51. Looking at our situation in Northampton/Weedon testing area, if you live in Northampton there are now testing stations closer and a choice of 2 (so far), however if you live to the west of the government testing station you now drive PAST a modern two lane station to a smaller dirty one lane station and pay £40 MORE for a test with a further £20 MORE to be loaded (as there is NO requirement for these new ATF sites to have a load simulator unlike the government sites!).

You now have to ring a central contact number in Swansea which would 'on paper' seem to be an improvement to make a booking rather than ringing your local test centre, however the people in Wales do NOT always know the closest test location to where you are based!

To sum up, you now ring someone in Wales for a test in Northampton, drive past a purpose built testing station that is only testing 3 days a week (for now) for a test in a converted garage and pay £60 MORE! This is NOT progress and is NOT good customer service! We should have government testing stations AND additional choice, NOT poor replacements!!

52. More competition for customer owned site

53. My answers to questions 10-13 are based on an assumption that tests will continue to be administered by VOSA or an equivalent public sector organisation, so again to avoid any potential issues with impartiality (the thought of commercial bodies administering their own tests is not a confidence inspiring one).

I understand the reasoning for maximising the number of locations for tests, and can see how this will benefit customers. I cannot see however, how this in itself will reduce red tape or enhance road safety.

54. My main concern with the privatisation/semi privatisation of HGV testing is that it may lead to the type of poor practices found in the car MOT testing scheme. Whilst the vast majority of garages conduct a high standard of test, there is a small minority who clearly bend or even flout the regulations; resulting in unroadworthy vehicles - with a current MOT test cert - travelling on our roads.

55. N/A

56. No (x8)



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57. Not involved with this type of test.
58. Not sure what reform means in this context as it does not say to what. More customer sites will have some benefit for businesses offering customer sites but equally there may be more businesses who do not have customer sites so have no benefit. If the geographical coverage is improved at no extra cost then this would be a good thing. If a public site is swapped for a private sector site then this will make no difference. Unless the private sector is tied into long periods (similar to leases) then costs may increase in churning sites or coverage gaps emerge in certain areas.
59. Once control is lost, standards will slip to lower levels
60. Open scope to fraud if not 'government run'
61. Over the last few years testing has radically changed where vosa now delivers its services at ATFs more and more as it intends to cease testing at its own sites were possible .vosa staff have taken on this with enthusiasm and now deliver afar more flexible service than ever before. A lot of the ATF sites are new build but some have been upgraded from dp sites not all sites are drive throughs. some you have drive in and reverse out and some reverse in and drive out which is time consuming as well as health and safety issues. Testing I believe in future years will be more expensive to the industry and we are beginning to find now with pit fees and admin fees. We are also finding that some small operators in some instances are finding it difficult to get tests at some of there local atf's and go further afield. There is talk of partners getting involved in testing. vosa is an independent body with impartiality when carrying out testing .and has professional staff providing a very flexible service .this service we provide has helped to bring the haulage industry up to a very high standard. If testing is transferred to the outside industry I feel that standards we have at present will quickly slide and we will go back to the days when hgvs and psvs were not so well maintained I know some companies would like to do there own testing, but also theres a lot of big companies who are more than satisfied with vosa carrying out testing due to the impartiality and the service and standards we provide. in my opinion the safety of the public is paramount and testing should stay under vosa (x2).
62. Private testing for private profit.
Why should independent garages support their rival garages.
Working within the private testing scheme my experiences are there is a risk of corruption, in passing unroadworthy vehicles, this could be more prevalent with HGV's as more money could be involved.
63. Provided the integrity of the test is not affected then the test can be conducted by suitably trained employees
64. ROAD SAFETY SHOULD BE THE MOST IMPORTANT REASON FOR CHANGE, I THINK IF THE STATISTICS SHOW AN INCREASE IN THE PASS RATE AT CUSTOMER SITES OR USING OUTSIDE PARTY WHO EMPLOY THEIR OWN PERSONELL TO CARRY OUT TESTS THIS SHOULD BE ABOLISHED AS SOON AS POSSIBLE
65. should not outsource or privatise agencies that have connection to the issue of legal documents as this can lead to fraud and corruption
66. Testing hgv and coaches is a very precise operation in the understanding and application of the regulations. These regulations by their nature can cause misunderstanding and consequently testing to the incorrect standard can occur. Testing also needs to be independent and impartial, and not subject to commercial pressures. If testing were to go like the garage scheme, its independence and impartiality would be the first things to be devalued. The test standard is at its barest minimum as it is, and a reduction in this standard will without doubt have a



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detrimental effect on road safety It must be realised, that in the independent sector, while being a vehicle tester, it may constitute only a small part of the revenue stream for that business. In this light, time and effort is kept to a minimum, and accuracy is therefore compromised. Full time, independent, impartial testers have only the test to concern themselves with. Therefore accuracy can be assured, as best as is physically possible. This is a very emotive subject and cannot be covered adequately on a questionnaire like this. The move to ATFs is now well under way, and while it suits some operators, there are a lot of operators that are very unhappy with the situation, unhappy with the extra costs and dislike intensely the fact that they are being forced to take their vehicles to a possible competitor, and pay for the privilege. However that ball is now rolling with ever increasing speed, if it continues its momentum we will see. In my opinion, H.G.V testing has to stay as a government operation. Where we do it, how we do it can be negotiated. I am not adverse to change, but I am adverse to change if it costs me money.

67. Testing of these vehicles should be continued to be conducted by DFT inspectors. The private vehicle testing scheme has a far greater error rate, there would be a significant risk to road safety if the standards of HGV/PSV were to decline to the same level as the private testing scheme.

68. The further away from the gov run testing station you move the higher the risk of corruption. Also the new sites are charging extra fees so increasing the cost of the customer.

The standard at the private stations is lower than that of the gov run ones.

69. The high standard of safety will be at stake if this is opened to the private sector

70. The impact on this is detrimental to road safety. Not only are customers now paying more for a test at an atf, but now we are going to have customers running the scheme? There are so many corrupt garages that are still running at the moment, including extortionate fees, that this seriously impacts road safety. I think the less government testing stations available the more problems the customer actually faces. How do we monitor this when we reduce the government agencies? How do you stop the bent testers when there is no one to monitor them?

71. The integrity of the HGV tests will be conceived as lost and all for the right reasons.

72. The introduction of the private sector to undertake testing of heavy vehicles (both HGV bus and coaches), will remove the impartiality, integrity and quality of the test and move it towards a system where there will be a greater likelihood of corruption as evident in the light vehicle testing scheme, the MOT. This is especially the case when considering the loss of income to an operator having a heavy vehicle off the road.

Mixing the private sector ethos of maximising profit with safety is always a dangerous enterprise. In order to maximise the benefits that could be obtained by such a move there would have to be strict policing systems in place that would deter and prevent the above from occurring. Given VOSA's role in MOT where the ratio of supervision of the scheme compared to turnover, volumes and test sites is low - these ratios would need to be ramped up to maintain neutral road safety value or indeed - increase road safety. Acknowledging 83% of our turnover is from fee raising - I would mutualise VOSA to allow additional funding and scope for development to market a scheme that is customer friendly but has the financial back up to invest in schemes that are comparable with the best.

Additionally, would increase VOSA's enforcement role and remove funding from Police in relation to motor vehicles. I'd leave them to deal with people and we will deal with vehicles. Releasing the time/money they spend on vehicle enforcement



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will enable money to be pumped into VOSA enforcement.

73. The only people to benefit from this would be the business/s who owns the site testing is conducted from. VOSA would lose out and so would companies who do not wish to take their drivers to a site owned by a rival company
74. The plans are suggested as solutions to problems that are not clearly defined. As mentioned on page 18 in paragraph 4 this seems to be a consultation on a consultation. Understanding that the "why" include aspirations of efficiency and economy does not provide a transition into the practicalities of delivering the aspirations. Without evidence to support the "why", any comment on the "how" could not be supported by evidence and would not be robust
75. The scheme should not be put into the private sector. The costs involved at some of the ATF's now by far outweigh the alleged advantage of testing on the doorstep. Some customers cannot get into one of these sites as operators are cherry picking.
76. The strategy does not make clear what the plan is in sufficient detail. But if it means that similar things are dealt with in a wholly or partly similar way then this should be good for the customer. Need to reflect that there is a wide range of customer types and sizes so we shouldn't assume that one size suits all.
77. There is increased risks that privately owned bus and testing services may be harder to regulate and maintain standards of services.
Rightly or wrongly, as an individual I have more confidence in a "government" branded testing facility as this provides greater accountability/ensures there are consistent standards which must be followed.
I would be fearful that standards and controls would not be adhered to if privately owned - there may be more opportunity for fraud/control weaknesses if cost is a driving factor in providing the service as opposed to road safety.
There is a risk that private companies would charge more for services currently provided. Once outsourced, it would be very difficult to bring back in house if required skills and expertise has already been lost.
78. There will be worse regulation of the tests. Test will be conducted less uniformly and it will be more difficult to appeal against the result of the tests.
79. These tests are vital to road safety and need to stay under tight government control.
80. This consultation doesn't make it clear that we have gone from driver testing questions to vehicle inspection annual test!
atf's are good however customers do not want to pay the extra fee's, which they don't have to pay vosa
some customers still fear the atf, thinking they will suffer an impartial test resulting in the atf gaining some repair work.
atf's been running 3 years and VOSA still haven't sorted their staff's T&C's and working practices, contract etc causing staff moral issues
I believe there is a potential for testing standards to fall due to pressure
81. To deliver a flexible workforce VOSA need freedom to build the right reward package to attract staff into the new structure. As a trading fund there should be more freedom to run as a Business without over burdensome central polices being imposed.
82. To summarise Civil Servants undertake annual testing of heavy vehicles do so under the provisions of the Civil Service Code, namely with
Integrity - putting the obligations of public service above personal interests
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Should the proposal to retain few, if any, VOSA owned testing stations go ahead, together with allowing the private sector to undertake heavy vehicle testing then I believe integrity, honesty, objectivity and impartiality of the testing of the largest and heaviest vehicles used on GB roads will be fatally compromised.

Looking at the model, and reputation, of the GB light vehicle testing scheme (and despite the efforts made by VOSA to improve standards), profit and safety does not mix. It would be criminal to move the heavy vehicle testing scheme down the same road.

The examples of EU member states (and beyond) whose vehicles operate in GB necessitated the formation of the HRTI teams is a lesson on what happens when privatised heavy vehicle testing (and little attention to further enforcement activities) is allowed.

GB's road safety record is something to be proud of and is something that VOSA staff are dedicated to protecting and improving. The bottom line of moving testing to the private sector will not be counted in pound notes but in lost lives.

For all our families sakes keep heavy vehicle testing in the hands of the public sector. (x31)

83. VOSA ATF process will deliver a better service to customers whilst still delivering road safety

84. VOSA is successfully implementing the strategy reducing our estate and moving to a partnership approach in which our private sector partners provide the test facilities and VOSA continues to provide examiners who are independent of operators, repairers or others who have a vested interest in the repair, sale or operation of commercial vehicles. VOSA provides a flexible to conduct the tests when the operator of the testing site wants.

With other business models, providing assurance that authorised providers are conducting tests to the required standard is likely to be bureaucratic and introduce red tape we would be transferring the cost and administration of training, authorising and monitoring of standards to the authorised body and therefore the customer (the opposite of shared services really) . It is unclear how the range of other heavy vehicle related inspections (ADR, TIR, load capacity variations, etc. would be conducted or vehicles presented for prohibition clearance would be re-inspected.

It should be noted that our testing function is a key part of our enforcement activity, In fact joined up enforcement, testing, licensing & authorisation is our unique selling point. All too often prohibitions or other intelligence discovered at Annual Test feeds our targeted enforcement and leads to 'O' Licensing disciplinary action - Therefore we have concerns how an authorised body would issue prohibitions or pass on intelligence discovered on a customer's vehicle(s) on what might have been a hard won testing contract.

There are also significant synergies between testing and enforcement services which reduce cost and increase flexibility of both services. These would be lost if the present business model were abandoned.

Test fees for HGVs and PSVs include most of the cost of VOSA's enforcement activities on these vehicles. If that element is removed the fee VOSA charges to test a 2 Axle truck of up to 17 Tonnes at just under £59 compares very favourably with just under £55 for a private car.

The total fees payable to VOSA for both testing and operator licensing represent somewhere between 0.48% and 0.37% of annual vehicle operating cost – depending on fleet size and mix

85. VOSA's current high standards of testing at their own premises must be maintained at non VOSA sites.

86. We have been successfully implementing a strategy of reducing our estate and



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moving to joint ventures and co production of testing services (private sector provide the facilities VOSA provides a flexible, reduced overhead work force to conduct the tests when the operator of the testing site wants). However, we do have concerns that inviting the private sector, or those with a particular 'interest' in the result of the test, to test their own vehicles would be seen to remove the impartiality of the test.

Providing assurance that authorised providers are conducting tests to the required standard is likely to be bureaucratic and introduce red tape as we would be transferring the cost and administration of training, authorising, fee collecting and monitoring of standards to the authorised body and therefore the customer (the opposite of shared services really) . The consultation is unclear how the range of other heavy vehicle related inspections (ADR, TIR, load capacity variations, etc.) would be conducted or vehicles presented for prohibition clearance would be reinspected.

It should be noted that our testing function is a key part of our enforcement activity, In fact joined up enforcement, testing, licensing & authorisation is our unique selling point. All too often prohibitions or other intelligence discovered at Annual Test feeds our targeted enforcement and leads to 'O' Licensing disciplinary action - Therefore we have concerns how an authorised body would issue prohibitions or pass on intelligence discovered on a customers vehicle(s) on what might have been a hard won testing contract.

The test fee includes the costs of Operator Licensing enforcement - the actual test element of the fee is comparatively very low - we are concerned that parts of the country where there is less testing demand (parts of Scotland for instance) authorising bodies could only break even if they increased the direct or associated costs of the test significantly to customers.

The actual test fee costs less than a tyre. All the information we have seen is that the industry is very satisfied with the testing services VOSA provides and there is no clamour for another provider. Are there any real benefits to road safety and the total costs of delivering heavy vehicle tests by having other providers?

87. While the new plans on testing are aimed at improving customer service by reducing GVTS's, customers are already getting frustrated by the additional costs ATF,s are charging, ie, lane fees. In addition, the inflexibility we are offering as a GVTS by not allowing bookings for re-tests over the counter is causing problems with customers, especially when the vehicle which needs a re-test is drawing a trailer which is presented for a test.
88. Why is it being changed it is already affecting our customers badly!
89. Will depend on where you are located in the country to level of service you can expect.
90. Working hand in hand with the vehicle operators and repairers industry is vital, giving the customers what they want, when they want it.
A high proportion of vehicle users were happy with the service they had in the past but now have to go through a third party to get their vehicles tested, ATF operators.
Consideration of using the current or reduced estate be more flexible and provide a greater range of services should be looked into.
Again moving the function of carrying out the test from agency control could remove the impartiality of the decision making and increase commercial pressure on the person making the decisions on safety of the vehicle on test.
91. Would further use of delegated examiners affect the integrity of the test?
92. You will put more drivers on the road that don't reach the required standard the DSA requires, a local army camp that has delegated examiners has a 99% pass rate and it is common knowledge that should one of their candidates not pass the



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reverse exercise for example they come back and only do that exercise and not the full test unlike civilians.

As regards to monitoring delegated examiners this is quite often done by DSA staff who don't even hold the category of licence themselves and the ones that do have no experience of driving loaded trucks/buses or even instructing on them.

93. Whilst VOSA is moving in the direction the Government wants by taking the test to some of our customers and making it easier for some operators to have tests, it leaves the smaller operator at a disadvantage. I have spoken to quite a few smaller operators and they prefer to have their tests at a VOSA station, rather than at the ATF 3rd party site. They don't feel that they are treated as a customer at the ATF and often have to travel much further for their tests. They are very concerned about testing losing its independent status along with the reputation that VOSA has for fair and independent testing against the stated standard.

If there were to be any move towards the independence of VOSA staff being compromised and moved into the private sector or suggestions that operators can be trusted to monitor and test their own and others standards, the smaller operators would be very unhappy. You only have to consider the pass rates to see that even though vehicles are prepared for test to a known and published standard, the pass rates are not that high. That's when they know that an independent inspector is about to test the vehicle, so standards are likely to drop if operators are able to police their own standards.

It is vital for the excellent international reputation that VOSA has gained that Testing and Enforcement activities remain independent and together. This gives the Enforcement arm of VOSA instant access to the results and standards of various operators which lead to the intelligence led Enforcement strategy. To disconnect the two sides of the business will not improve standards of vehicles and drivers. We know that the KSI figures are just slightly creeping up, for the first time in a decade, so if the Government wants to keep our reputation for the safest roads in the world, it needs to invest in a independent, fair and impartial system of testing and enforcing driver and vehicle standards.

There is also the issue of the most costly types of testing and testing in remote locations. Where there is no profit to be made, ATF's will not want to pick up this more onerous testing where equipment, for example, has to be at a higher rating and more expensive in order to deal with testing vehicles carrying hazardous chemicals. To some extent, the 'profit' made by VOSA at the sites where lots of tests are carried out at the larger sites; off-set the costs of testing in the Highlands and Islands, where there is little interest from the private sector. This means that the tax payer will have to fund the more remote and expensive testing whilst the easy money is taken out of the organisation by the private sector.

I am not against the ATF strategy, we do need to reform our services but we also need to make sure that all customers, not just our larger customers, can receive an excellent service from VOSA. That means giving operators a choice in how they get their tests done, which means keeping some VOSA sites in operation.

Are more staff are needed to operate the ATF model, rather than less?

The Government states that it wants to encourage SME's and give those using its services both good value for money and choice, concentrating on delivering services at the customers convenience rather than ours. The proposals stated will only achieve this for a portion of our customers, not all of them.



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

1. A better organisation of boundaries would be to split the DVLA merging the Driver Licencing side with the DSA who already provide the Theory Test and Driving Test and also registration of instructors, bringing all aspects of Driver Licencing under one roof and merge all the Vehicle Licencing, Registration and Testing together giving 2 streamlined Agencies one dealing with Drivers and the other dealing Vehicles
2. Agencies should stay as is specialists in their own areas
3. As ever, the ideas sound nice on paper, however, anyone with real experience of such endeavours will no there is a large gap between ambitions and outcomes, witness the current shared services between DSA and DVLA.
4. As long as the integrity remains an essential part of this process then any forward steps are welcomed.
This re-definition seems like a backward step, essentially the DfT used to be under the same roof. The executive agencies were born due to the problems DfT had with this, so what's changed? Have lessons been learned?
5. At the moment admin roles are duplicated e.g. HR and H&S, do we need separate departments for each agency or one larger on for all.
6. Change is certain; it should not be used to get rid of civil servants for the sake of making it easier for government.
Integrity should not be watered down by privatisation.
If Driving examiners were made self employed I feel self preservation will prevail and the test could suffer.
7. Clearly, from an enforcement perspective closer cooperation with other agencies can only be to the good. However, I feel that each agency should retain its own separate identity.
8. Closing HGV test stations is a false economy, utilisation of staff has always been considerably higher at a VOSA test station than a non VOSA site. Costs will be transferred to running and supporting a mobile workforce, the smaller haulage businesses and the horse box community. Unless the function is privatised costs and efficiency will become difficult to monitor and manage.
At no time should the private industry be in a position to inspect and sign off their vehicles as roadworthy
9. Collaborative, joined-up working must be a positive move. We do however need to ensure that specialist knowledge is not watered down to the point of becoming ineffectual. We need to be masters of our game, not jacks of all trades and masters of none.
10. Combining back office functions makes a lot of sense, but it can also dilute attention to the specific needs of each agency's customers, including businesses. Each agency has built an understanding of its customers and engages them appropriately. Forcing customers to comply with 'vanilla' or 'one size fits all' systems increases their costs and impoverishes service. There is no reason that these agencies cannot optimise behind the scenes by behaving as One Team, while maintaining their front line identities and dedication to user-led services.
11. Currently each agency carries out it's own work. Their work if of a regulatory or enforcement nature should be kept within government and not privatised.
Enforcement work should not be entrusted to private industry.
12. Customers are not bothered by organisational boundaries (and there always have to be some) provided they do not get in the way.
We want to rationalise the number of agencies and reconfigure our organisation to reduce cost and improve consistency. Comment: Rationalising should not be a



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goal in its own right, the aim should be to make boundaries invisible to the customer.

We are committed to greater sharing of back office functions and a reduction in our estate. Comment: This only makes sense if processes can be rationalised and cost is less. DfT Shared services for financial and HR services has cost more. The NAO report on DfT shared services programme said "The Programme would, under the terms of the Department's initial financial appraisal, represent a net cost to the Department of £81.1 million up to 2015"

We are equally committed to ensuring that the customer experience is made simpler and more straightforward. We will focus on:

- driving single provision of back office functions, including business support and ICT – agree makes sense provided that costs are less after taking into account the costs of set up, future changes and transition. If you are not clear on what you want or wish to change in future this will be costly – the private sector make profit in Government contracts out the Government changing its mind. Civil Servants can respond to change a low or no cost. The NAO report into shared services recommended:

- All departments considering introducing shared services should:

- o establish a business case that:

- § is based on a rigorous prior analysis of the business process and sufficient levels of consultation with those involved in the work;

- § considers all delivery options, including the purchasing of services from an established external provider; and

- § makes a realistic assessment of all associated costs and benefits for each option, without over-reliance on benchmarks to estimate costs and savings;

- o collect data on the existing support system to provide baseline performance before moving to shared services;

- o demonstrate to staff at all levels how shared services will benefit the organisation as a whole and individuals and why working practices need to change, for example by pointing out the cost benefits of standardising procedures and the merits for staff of being able to confirm the accuracy of payroll, overtime, travel claims and other financial details online before payment is made;

- o set out in Service Level Agreements that any nonstandard business processes required by business units will cost more;

- o underpin the implementation timetable with realistic planning (which might include stretch targets) rather than drive it by a desire to introduce shared services arrangements by a non-negotiable date;

- o appoint high calibre personnel with relevant experience of implementing shared service transformation programmes to key management and operational posts from the outset, while maintaining a level of civil service staff on implementation teams so that knowledge and skills can be transferred;

- o transfer individual businesses to shared services incrementally to allow lessons to be learned from each transfer phase;

- o provide adequate resources for data cleansing, migration planning and testing of data prior to service migration and provide realistic and timely staff training;

- o engage closely with prospective shared service centre users prior to migration and sustain such liaison for a reasonable period after migration to resolve system glitches and to ensure sufficient "buy-in" by users of the shared services systems; and

- o introduce clear audit trails for the validation, approval and payment of invoices within arrangements for managing external contractors responsible for delivering the shared service systems.

- bringing common services together, and reviewing how they are delivered,



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including licensing and approvals, testing, training, call centre provision and the provision of advice and information, and standard setting – comment: should be subject to business case and NAO recommendations above.

13. cut the fat
14. Depends on what we mean by rationalisation. I have no objections to seeking to deliver services more effectively and efficiently.
15. Each department are skilled in their fields
16. Ensure that the organisations that deliver take the lead in any changes. The agencies who are still years behind should be dragged up to date.
17. Harmonising some aspects of the different agencies could yield some benefits.
18. Having read the consultation document there are two paragraphs which for me - stand out:-
 1. Talk of reducing number of organisations delivering motoring services to reduce government costs.
 2. Opening up motoring services provision to a wide range of organisations and deliver better services?????????In VOSA's case - the agency is increasing the use of Authorised Test Facilities (ATFs) to reduce the number of Government owned Test Stations. My concern is who will ensure ATFs provide A1 Service if the if the number of agencies are being reduced ; and ultimately, how will this ensure consistency? Consistency? I have my doubts about this particular use of word along with the highlighted phrases
19. I am concerned about the safety implications of allowing companies to conduct tests for profit as this will lead to lower quality testing and reduced road safety. As companies vie for market share it will only be a matter of time before managers demand that examiners pass more people to give higher pass rates than competitors thus increasing the probability of candidates using their company. As has been shown by the recent court cases revolving around bus companies employees giving away licences for profit.
20. I am less concerned about amalgamating Agencies or bodies however, VOSA has a very ambitious five year plan to transform our services, to improve our finances and more importantly to make significant improvements in road safety and the compliance of the industry. I am very concerned if any 'organisational boundary changes' put this ambitious and necessary change agenda, that we have been integral in developing, at risk. Furthermore, the cost of such change would not be inconsiderable. The obvious costs of consultancy and systems integration could probably be shown to generate a payback within 3 to 5 years from "efficiency savings". However, by the time the savings were supposed to have been delivered, so many other things would have changed that it is highly improbable that they could actually be realised. There would also be very considerable hidden costs because management time which would have been devoted to improving the services of the present agencies would have been diverted onto the process of change.
21. I am worried by the suggestion that we need a diverse range of providers to deliver these services. This is in effect privatisation and needs to take into consideration the failing of the private sector to ever deliver public services to a standard that is at least consistent with current practices. These organisations operate only for profit -as can be seen by price hikes in gas, electricity, water services, and rail at a time where public services run by the public sectors have not increased prices and have operated within budgetary constraint. For example the driving test fee. In addition any and every attempt to privatise part of our service - like the theory test, fraud investigations, driver CPC activities have simply resulted in high cost low



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output solutions. Successive private sector companies have consistently failed to grasp the true customer service requirements of the theory test operation and have sought at every opportunity to impose additional costs. Fraud investigations are conducted by investigators who cost three or four times that of staff who would be perfectly capable of carrying out the same role, similarly Driver CPC audits at conducted at about three times the day rate that staff already in DSA carry out this work. In my view our work is at a higher all-round standard than that often provided by the private sector who look for short-cuts and fail to appreciate the detail of the work. Albeit they are often not constrained by the same red-tape that restricts the public sector operation. If that red tape were removed and the public sector allowed to compete effectively with the private then there is no doubt with would be the more effective operator. What is required is to resource the public sector properly and allow us to conduct our business cost effectively - minimising high cost inputs from the private sector. This should be about the delivery of public services to the public and for the public - not sheer privatisation so that some 'captains of industry' can line their pockets. It is critical that the delivery of public services remains 'not for profit', and anything else is unacceptable.

22. I believe that public services should continually be evolving to offer improved delivery and embrace technological opportunities. This has been the case with DSA ever since it was established as one of the first executive agencies by the Thatcher government in 1990. Examples of changes over the last two decades include:

- paper applications being replaced by telephone bookings which are, in turn, giving way to internet transactions.
- the introduction of the theory test, first as a paper based, and then a touch screen computerised, examination.
- the addition of the hazard perception test, at the time at the forefront of cutting edge road safety technology.

But any change, such as rationalisation of functions or boundaries, must be closely linked to the benefits arising as a result. At present, each Agency has its own unique - and recognised - functional area of responsibility. DSA's staff have enormous expertise. This ranges from technical skills among senior driving examiner professionals, through the ability to seek value for money from those on the finance side, to many years of policy knowledge and experience. What all the individuals who make up the Agency have in common is a passionate commitment to road safety.

In the process of any change, care should be taken to protect the expertise that has been nurtured and ensure that the Agency is able to continue towards its overall goal of reducing casualties and improving safety on the roads of Great Britain.

23. I can see merit in reducing artificial organisational boundaries and duplication. However I am less concerned about amalgamating Agencies or bodies than seeing through VOSAs ambitious five year plan to transform our services, to improve our finances and more importantly to make significant improvements in road safety and the compliance of the industry. I would be very concerned if any 'organisational boundary changes' and the necessary effort to join separate organisations together deflected us from our ambitious and necessary change agenda, that frankly I have been integral in developing.
24. I can see the benefits of cross-organisational working however I do have concerns that as each organisation has different IT systems, how would they all link up. Would the cost of improving existing systems to make them compatible or developing new ones outweigh any cost reductions made by rationalising agencies and inevitable staff reductions



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25. I do not think it is a good idea.
26. I do not think that bringing the services together will benefit anyone except the government. This would cause confusion to the public, also worry and upheaval to the staff working in the companies, and yet again probable job losses when people are brought together in one place. Moving people from a local area to one building within the same local area they are already based would make sense for minimising estate, however not merging the overall working of DSA/DVLA etc.. (eg moving DSA to a HMRC site, or VOSA to a DSA site, but still separate workings)
27. I feel sharing back room services, such as HR, is a good cost effective idea, but feel frontline staff and their admin support are very good at what they do because their roles and duties are specific to the organisation they work for, and if these staff are tasked with taking on extra responsibilities we will water down the skills they already possess, leading to a reduction in customer service.
28. I have worked in the back office functions of two DfT agencies - In a contact centre, and an ICT department. I am sure that the core skills in these departments are common to all DfT agencies. I believe savings could be made across DfT by bringing these services together.
29. I personally feel a one-stop shop, which the old Traffic Areas virtually were, are helpful, rather than reorganisation.
30. I think it is a good idea to look at ways of making it easier for customers to access services, however I do not agree with privatisation of Public Services as I believe standards can drop when driven by profit greedy companies. This has happened in the past too many times.
The driving test should not be compromised!
31. I think re defining organisational boundaries only reduces cost, but the services would suffer. We cant keep saying the computer can do it all... what happens when the computers crash? And what happens when customers cant get a test, who can they phone? no-one... cause we are all on computer now?? Doesn't make sense at all, apart from cost cutting exercise.
32. I think that it should be possible to combine the 4 separate agencies so that each could benefit from admin and computer systems so that would make operation more cost effective.
An example could be dsa and vosa joining forces and examiners not only looking at candidates but also traffic examination this would ensure that examiners are fully utilised and would also create a more diverse work force.
33. I think we should look at the myth of offices full of civil servants doing one job and taking an age to do it, I would welcome a private company to come and visit us and discuss the merits of civil servants in the delivery role. It is a shame when the headlines are around pay and pensions and even then they are not reported factually, yet we never get a minister standing up for us publicly. In truth there are many civil servants at L2, 3, 4 and 6 working extremely hard to deliver a quality service and are proud and passionate about what they do, yet publicly they are all too often criticised for staying loyal by saying its only for the gold plated pension, I can assure those working in the private sector that the salary is adequate and benefits reasonable but would draw the line at gold plated. I line manage 167 people in 7 locations and in the whole they work damned hard and are extremely aware of their role and the impact it has on the day to day delivery of small medium and large enterprises. It was interesting to see the amount of praise lavished on this years games with an honours list brimming with executive names when in truth a lot of the work was done quietly and in the background and as part of the day job. I certainly dont recall being allowed to increase my headcount prior to the summer of 2012. Yet everything asked was delivered and without fanfare, perhaps we dont give ourselves enough praise or we accept the criticism of private industry whilst



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- we put our heads down and carry on
34. I'm not sure how defining organisational boundaries = better service. It sounds like fluffy bureaucratic talk to me. How does 'rationalising the number of agencies' fit with 'enabling the VCA to grow'? That sounds like a contradiction of terms.
 35. In order to put the customer at the heart of the Motoring Services organisation it should be structured around the customers needs. There are three clear groups of customers' needs - drivers; vehicle keepers and large vehicle fleet operators. Three units each dedicated to addressing those needs would be a firm basis for holistic, service oriented government business that balanced the needs of those customer groups with the overall aim of steadily improving safety on the roads.
 36. In principle seems OK but there is a huge amount of effort (I would advise learning from HMRC process review which boiled down all business lines to a common view of the customer with 23 core processes - most of which are the same as ours.)
 37. It is of course the right thing to do to rationalise services to reduce duplication and increase cost efficiencies, particularly for the back office. However, we do need to learn lessons from the recent West Coast Rail debacle which was blamed on a lack of back-office expertise and experience. Too much paring back will adversely affect the front-line services and impact on customers' ability to be compliant.
 38. It makes sense to merge agencies where theoretically their duties cross over. I.e. The DSA & DVLA, this could be under the umbrella of licensing and licence acquisitions. With centralised departments for customer services & HR etc.
 39. It makes sense to review org-boundaries but please don't do this just for the sake of doing so. Any business case supporting re-org must be transparent and sufficient time must be allowed to review efficiency/effectiveness and practicality of making a change.
 40. It would seem practical to link the mentioned Agencies to reduce estate and provide a one stop shop for customers
 41. It's just messing about the agencies already have clear remits.
 42. keep our boundaries as they are making hasty changes is not always the correct decision (x2)
 43. Merge VOSA and DSA
 44. MOVE THEM ALL TOGETHER IS THE WAY FORWARD.
 45. My major concern is to align the policy process within the various agencies. At the present moment there is a policy disconnect between DfT and the DSA and potential divergence between the strategies being pursued by agencies. It is a nonsense to have a policy process at DfT, and another in the agencies. This simply leads to greater bureaucracy in the policy implementation process. To my mind the logical structure would be a central policy function, populated perhaps by those who have acquired skill sets through their face to face engagement with stakeholders, and then to have dedicated operational delivery functions. Those delivery functions would be more readily privatisable if they were tasked to work within a clear standards and policy framework set by DfT.
 46. My opinion is that we should not have a number of agencies carrying out the same functions in particular back office/ common work.
One HR department, One finance section, One application branch, One enforcement section for all the motoring agencies should reduce costs and appears to make sense.
 47. No (x7)
 48. No - I don't agree.
I have no great tie to the existing agency boundaries, but it would appear premature and irrelevant to be considering these now. Reform must be focused around the services we deliver and ensuring that these are necessary and streamlined in a customer-centric manner. It is clear that we have not yet identified



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what our service offerings should be and how they will be delivered - and that must be done before we consider agency boundaries. Of course, once we have done that it may be relevant to do that - particular if it is clear that many services cross agency boundaries, where it is clear that effective ongoing customer-centric agile improvement would be impeded by the boundaries

49. no comment

50. No, working under a broader governing body could reduce red-tape

51. None

52. Not really, seem a little vague?

53. Not sure there's a real need.

54. Privatisation of the driving test will put the integrity of the test and the current high standard at stake

55. provided there is adequate training for staff and adequate compensation in terms of salary and conditions for any increased responsibilities for individuals

56. Rationalising Agencies during a recession seems the wrong thing to do, all are funded by fairly competitive fees, all deliver different services and have different back office needs. The cost of changing agency boundaries is likely to have a hit on Treasury funding. Previous attempts at shared services (HR and Finance) have not delivered the savings they identified.

57. Re-define is fine if it improves the situation. However there is nothing worse than change for changes sake, or to make the situation worse.

58. scrap all the agencies and bring them back under the department for transport directly allowing all upper management to be freed up from at least 3 of the 4 agencies

59. Some organisations work too far apart in procedures. No two agencies are the same. From experiences the agencies shave there own systems that don't marry up. I feel they could not work along side each other as the customer delivery is too far removed from one agency to another. What happens with DVLA, will have no effect on how the DSA work.

60. Speaking as a taxpayer/customer of these Agencies, I support the aims of improving communications with customers and ensuring the separate bodies work consistently with each other.

Rationalising back office services will offer no benefit to me as taxpayer, as any potential savings will represent a miniscule amount within the wider picture of Government spending.

I would strongly urge the Government to think very carefully before attempting any mergers/significant changes to who delivers what, as there is a real risk of merely blurring organisational boundaries. This would offer no benefit to the customer, and would in fact pose a threat to existing levels of clarity. The status quo offers a clear picture of which Agency is responsible for each particular activity, and I feel it would be to the detriment of each Agency and DfT as a whole if that clarity were to be lost.

61. Staff are civil servants within the Department for Transport. Abolish all four agencies in the motor services and bring all staff together within the one Department.

62. The current boundaries do not continue to make good business sense.

As the consultation states, the department delivers a number of functions including standard setting, licensing and testing.

It would make sense to organise the department around those core activities.

You could have executive agencies as follows:

Motoring Licensing Agency (MLA)

This agency could deal with all parts of driver and vehicle licensing currently

managed by DVLA, and the licensing of driver and rider trainers currently managed



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by DSA.

Motoring Testing Agency (MTA)

This agency could deal with all parts of driver and vehicle testing, including the theory and practical driving test and vehicle testing conducted by VOSA.

Motoring Standards Agency (MSA)

This agency could set standards for drivers and vehicles, and would be a centre of technical expertise.

Motoring Enforcement Agency (MEA)

A separate agency to bring together enforcement activity currently carried out by DVLA, VOSA and DSA, including licensing, driving test fraud and vocational driver checks.

In line with the government's IT strategy, these agencies could use the same systems to reduce costs and improve efficiency.

As shared services continues to grow, all the agencies would be served by those for HR, finance and procurement.

To ensure value for money and best use of the estate, a single estates function should operate across the agencies.

As the public would largely only deal with 2 of those agencies, a single customer service centre could be operated for phone enquiries, but with a constant effort to improve services to reduce contact in the first instance.

Each agency should have its own niche support functions to deliver corporate support and internal and external communication to stakeholders.

63. The Driving Test should remain within DSA.

64. The integrity of any test when privatised will be lost forever. Driving Examiners are highly trained people to assess drivers or riders and not just 'fault reporters' as may be perceived by your Ministers or the general public. Re-defining organisational boundaries sounds good but simply waters down the skills involved in what has made our roads safer than our other EEU members.

65. The one gov.uk site is a good start, we already have joint DSA & VOSA sites in some areas, but these are being closed; so in some areas this is a step backwards and in my opinion is NOT what you are trying to achieve.

66. The one problem we have is the customer behind the wheel of the vehicle. Also the technology we use in the vehicles to distract us. What needs to be done is a driver safety training test.

Every year our highway code improves and the way we drive and read signs are different to what they were years and years ago, but experienced and non experienced drivers are not keeping themselves up to date with any of the new changes and this could cause confusion and even accidents. What needs to be done is every 5-10 years the customer needs to take a refresher test on the Highway Code and a short driving test. Cars need to be tested every year to be safe on the road so why can't we be tested to see if we are safe?

the tests would involve a short multiple choice question just like the theory test (as that test even expired after 2 years if you didn't pass your practical test, so what changes in 2 years of not passing the test to being 2+ years driving a car) to give customers a reminder of the highway code. then a short 30 minute practical test of manoeuvres and signals and speed (this could be done by the DSA in a private ground like police car training or an examiner sits in the car just like the practical test), as drivers on the road today are not concentrating not obeying the speed limits and are not using their indicators or looking and caring about others safety, this leads to accidents. if the drivers fail their test then they are not permitted to drive until they pass, just like a car is not allowed on the road or be driven if it fails its m.o.t. when the test is passed then they can drive again. This may not change the safety as people will go back to old habits, but it will lower the amount of



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- accidents on the road today. the cost of the tests can be the price of a m.o.t.
67. The public still do not understand the separation between DSA and DVLA. The public still have to inform each Agency separately if changing address for example. Despite each Agency being part of DfT. This was supposed to have happened around 10 years ago
68. The strategy is incoherent without taking into account the Cook Report on the future of the Highways Agency [The Cook Report of itself was not dynamic enough]. The starting point has to be what is the future of the HA and how should it be funded. If through a retained VED then logically this should be redefined as a road access charge and hypothetised to the HA. Once this decision is made the future of the DVLA can be defined.
- I would propose that we firmly grasp the nettle in respect of DVLA and undertake the following: 1.) Franchise Cherished Numbers to the Private Sector whilst lift existing numbering constraints - this will raise significant and repeatable sums to HMT. 2.) VED activities of DVLA should be transferred to HA 3.) It is inefficient and incoherent that DSA grants a Driver licence and DVLA maintain the paperwork - DVLA's Driver Licensing should be transferred to DSA [see below] 4.) Vehicle Registration should be transferred to VOSA.
- I further propose that DSA and VOSA be merged to create an Office of Traffic Regulation [OTR]. We should mirror the Rail Organisational structure with HA as the Infrastructure Company operating as a Not-for-Profit NDPB [Network Rail model] and the combined DSA/VOSA fulfilling the role of the ORR/OIRR.
69. The unions believe that any merger at present between VOSA and DSA would be a cost cutting measure and not something which would provide better public service provision.
- Moreover it is not clear what service synergies there are between the two organisations.
- The fact is that both VOSA and DSA are already being forced towards using private sector premises to deliver their services. We believe this is impacting on the road safety standards. Any proposed merger of the Agencies would have to be based on putting public services first, and maintaining existing staffing levels
70. There are similarities in much of the work carried out by DSA and VOSA and there would appear to be some benefits. Previous arrangements saw central functions for the department such as HR Finance & Training but it was considered to be more effective to devolve these functions to Agency level. Why the change back now?
71. There is a need to ensure integrity is kept in place with regard to testing.
72. There should be a single source of provision for motoring testing & licensing. However, the DVLA is probably the most inefficient organisation of those mentioned, with the DSA a close second.
- VOSA appear to have both the dynamic leadership and the ability to accommodate change but is regarded as a 'small player' in comparison with the aforementioned bodies.
- It will be a shame but most people believe all the motoring provision will be 'swallowed' by DVLA following any reorganisation.
73. There should be clear organisational efficiency reasons for doing so - I don't believe that this has been given anywhere near the level of consideration it should. If you were to change boundaries, it should be from the perspective of the customer, who distinguishes between vehicle issues and driver issues, not licensing and testing - which suggests any reorganisation should be considered along the lines of putting DVLA's vehicle responsibilities with VOSA and DVLA's driver responsibilities with DSA
74. There's a danger that a lot of work is carried out for little or no gain. Its easy to say



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that re-defining organisational boundaries will save money but its often the reality is more difficult and costly to achieve. Constant change for organisations is itself inefficient as is continual uncertainty. It would be refreshing for Agencies to be given cost saving targets and being allowed to deliver those savings without constant interference and changing of minds. The amount of time and effort expended by VOSA is previous attempts to join the Shared Services programme is a prime example.

75. There's not enough information in the consultation document to really comment. Sharing of ICT makes sense, but this is already in progress for contracts across government. As for the "bringing together of common services", I don't really know what this means, but if it effects that quality of care that customers receive than I disagree with this. Reading between the lines it seems that the idea is to have all non-operational/admin staff located in Whitehall.
76. This is just a cost cutting exercise and will result in poorer services to the public. Economies of scale result in delivery of services more remotely and make it more difficult to resolve problems.
77. This is supposed to be an independent honest driving test, so how will it look doing it from Halfords (which is part of the AA) when other candidates see a candidate pass in an AA school car. Will they presume it was an honest pass or showing favour to the AA customer?
78. THIS SHOULD BE KEPT IN HOUSE
79. Time has moved on since the creation of computerised driving licences in the 1970s. The organisational boundaries should indeed be re-assessed, for example it would be possible now to combine elements of the MoT (VOSA) with elements of VCA, and similarly parts of DVLA with DSA. The word "Licences" can apply to "people" (driving licences), "cars" (road tax or vehicle excise duty) and "ownership" (registration documents). Similarly "documents" could combine these in a different way, there are enforcement opportunities available by combining MoT and Registration documents.
80. Times move on however technology can only do so much and the reliability of IT systems will determine how effective the definement between organisational boundaries is,
81. Too much change in the running and outward appearance of a trusted agency can be confusing and can worry customers.
82. We are less concerned about amalgamating Agencies or bodies however, VOSA has a very ambitious five year plan to transform our services, to improve our finances and more importantly to make significant improvements in road safety and the compliance of the industry.
We would be very concerned if any 'organisational boundary changes' put this ambitious and necessary change agenda, that we have been integral in developing, at risk
83. Whilst the streamlining of certain core back office functions (finance, HR, procurement, etc) is a no-brainer, the operational delivery side might be more tricky to achieve without imploding the service delivery.
84. With bringing all the motoring services together it would be easier to recognise who is who. They could even be called The Ministry of Transport. I think the wheel has been re invented.
85. Yes. I believe that each sector has its own roles and has its own relationship with its customers. Trying to incorporate all these services into one, would mean less time and attention was paid to the specific customers requirements.
86. You need to look at how data is shared between the organisations and within. DVLA do not communicate between vehicle and driver licensing. DSA are unable to interpret the licence information held on our records prompting them to call us to



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clarify and causing problems for the customer whilst they try to use the online systems we promote



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

1. "Road safety" is the key priority but receives very little exposure in the Consultation document. Improving the "service" to everyone in the UK can be done by reducing collisions on the road. The cost of each fatal collision should be a major factor in the decision to reduce costs by amending administrative and organisational boundaries; the issue is that defining or tracking the effect is made difficult by the natural time delays between training and subsequent driver performance.
2. Allow DSA to take on the VOSA sites vacated as a result of moving testing to ATFs so they can continue to service demand for vocational testing. Many in the industry are worried that closures may mean they have no option but to go out of business as the cost of travelling to alternative locations makes them uncompetitive with those located nearer a tests centre.
3. Although meetings with those in the industry are given these are not really effective, and can still give a them and us feel.
4. As a DSA driving test centre manager I would welcome a stronger response to people acting outside of our quality guidelines or even the law. It is a frustration to regularly witness people flouting the law with very little real risk of repercussions. As an employee I would welcome being treated with more respect and even remuneration. If we are being gradually brought into line with the private sector then pay should be a part of that. I have tolerated poor pay for a number of years in public service, happy that my pension would one day make amends for this. I trust I didn't make an error in deciding to share 25 years of private sector experience with the public sector.
As a road user, I expect Motoring Services to ensure that the drivers and vehicles I encounter, hour on hour, day on day are operating to the highest standards at all times. I require responsibility to be taken and owned by our political masters to ensure safety is never compromised on our roads.
5. As almost every aspect of our job is now using computers etc. could we please have hardware and software that is fit for purpose and easier access to the equipment eg one PC per member of staff.
6. as I've already said vosa is now more flexible service with staff that is more than happy to provide a good service .the service you can provide to us is by keeping us up to date with training and the tools to keep carrying out our job in a professional way so we can deliver this to the public (x2).
7. As stated before, customers require MORE choice which includes government sites with the standard fee, not replacement sites which ultimately charge MORE!
8. As there is now a link between the DfT and the Motor Insurance industry database, I would like to see the government ensure that insurance rates are just and fair, and in particular for necessary third party insurance.
9. Better training and monitoring of independent driving instructors to ensure a high and appropriate level of training is given to candidates before they arrive for their driving test.
10. Bring back a direct telephone line to the test centres.
11. Deliver the service required at the levels required; not less.
12. Digital service is the way forward and making all centres easier to contact thus reducing the amount of travel to book a service with what every agency.
13. Do not discount the benefits of face to face communication. I visited DVLA recently to register a vehicle and found that the call centre staff had given me incorrect information. If I hadn't used the local office my application would have



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- been delayed or lost for being incorrect. There is nothing like speaking to someone in person.
14. Don't put it in the hands of the private sector. Driving Examiners are extremely professional and are ambassadors for road safety. It is not right that this key road safety role is removed from the public sector.
 15. HGV & PSV Annual Testing should have been kept at test stations (we should have modernised or relocated or built super centres)
 16. How about looking to remove the need for a paper MOT certificate? A lot of money has been saved by moving to a "plain paper certificate" but its time to move away from a piece of paper all together (unless the customer wants to pay for one). A certificate could also be made available online for customers to print out if they wish. The Police already have details of MOT test passes electronically so why have 28million pieces of paper? Failing that - a way of combining tax disc and MOT certificate would be useful.
 17. I agree that there are opportunities to share resources/make better use of back office functions across the transport family e.g.
IT - significant amounts of IT kit and equipment which is under utilised at DVLA. Adopting GCloud strategies and services and technologies must be the way forward. The ideal would be to have common IT platforms/services across the transport family.
Introduction of customer relationship databases/services which enable customers to interact and obtain any of the services on offer across transport (and truly support the one shop stop ethos). Why do we still each maintain separate customer details - ultimately we are all dealing with the same customer but at different stages of a customer journey. As a customer I would like to be able to access one site to apply for a driving licence, book driving lessons, provisionally book a test, seek cheap insurance for my car, book an MOT/HGV test at an approved centre, notify changes etc etc etc. As a customer I want incentives to utilise online services as opposed to making personal visits/manual applications - e.g. a free driving lesson free if using the online system for a first time and prepared to book your test in advance,
Centralised Printing facilities - why not utilise one or two sites for printing all our required outputs - would this be more cost effective than maintaining individual printing capabilities at each agency /business?
Other possible options might be merging policy functions, finance functions, adopting common casework systems
 18. I am concerned about the safety implications of allowing companies to conduct tests for profit as this will lead to lower quality testing and reduced road safety. As companies vie for market share it will only be a matter of time before managers demand that examiners pass more people to give higher pass rates than competitors thus increasing the probability of candidates using their company. As has been shown by the recent court cases revolving around bus companies employees giving away licences for profit.
 19. I can provide full verbatims for this question from quantitative surveys of operators, ATF's and MOT garages which can better populate this question.
 20. I have accessed the systems as a user, for myself and dependants. The only problems I've had is when I don't fit the criteria using the digital service. I was annoyed with the process of SORN, happy with the application for a Tax disc, I think maintaining a functioning service and reducing the mainstream costs would make me happy.
 21. I think all these services can be improved by bringing IT in-house, and not spending excessive amounts outsourcing IT from all 4 sectors. 1 in-house solution would cost a lot less, and would help bring staff closer to customers. Would give



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- all sectors increased control to respond to customer requirements.
22. I would like to see in the future the provision of services provided by the local authorities also taken into account, there is also a crossover between the work done by central and local government. ie Taxi licensing and testing, trading standards involvement in roadside enforcement.
 23. If providing a public service it should be just that. A service that benefits the public
 24. Improvement of IT systems with certain organisations would benefit both internal and external customers.
 25. Increase digital services but not at the expense of being able to contact a human being to resolve problems. Digital services are fine as long as there are not prolonged gaps in service the result of maintenance or computer failures.
 26. Keep it all within the Governments remit as most of the services that are provided by the four agencies are self funded!
 27. Keep it digital, explore taking test to the customer more but above all keep it safe by control with the Agency set up to do just that.
 28. Let us concentrate on the job of improving road safety without constant interference and short term changes depending on who is running the shop.
 29. Listen to customers and make sure that customers are consulted and included in any plans to improve service. Ask the customer what they would like and wherever possible listen to them rather than making assumptions.
 30. Listen to the views of the people.
 31. Make manoeuvre areas for cars on DSA test sites then there may not be any need to go off main roads in bad weather and will have less tests lost due to bad weather. All main roads get gritted but not estate roads.
 32. More open Data Access
More trust put in Civil Servants in these agencies to deliver.
Give agencies more freedom to run their business without all the constraints applied to vote funded departments.
 33. more places to do module two tests
 34. NA
 35. No (x8)
 36. no comment
 37. No direct comments from me on this point although prior to the Motoring Services Strategy VOSA has been developing a growing partnership with the private sector. To date over 300 businesses have become part of the ATF network and over 60% of our heavy vehicle tests are being conducted at private sector premises delivering the MS strategy commitment to bring testing closer to our customers
 38. None (x4)
 39. Not applicable to our particular response, although we believe our response makes clear our absolute commitment to improving our services to our customers
 40. Nothing beyond what I have said above.
 41. Only by getting rid of paper as mentioned before paper licences and tax discs are pointless and we have anpr which could check vehicle reg document and tax altogether
 42. Only the public service (Agency) can provide the high level of service that our main stake holders (the Public) expect. The public expect this service to be delivered by a diverse mix of staff that provides this service in a truly non profit making integral manner and a service that is truly socially inclusive to all within our society. Anything less than this will undermine the provision of the driving test as profit could be put before the truly inclusive delivery of the service to all
 43. Please do what you can to understand the roles of the agencies. I fully support



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the review and think it is overdue but it does come across slightly as an exercise to deliver a smaller estate and reduce headcount giving an overall financial saving. Whilst that maybe a benefit outcome have we reviewed the strategy for the right reasons.

44. Privatisation of the driving test will put the integrity of the test and the current high standard at stake
45. Save financial costs on surveys and other policies, Run VOSA as a strong private industry, Follow Good companies policies. It's a tough world.
46. See above (x2)
47. Service levels are already high and better than many private sector organisations I deal with

We will work more consistently together to ensure that we have comparable processes for listening to what customers tell us and receiving feedback, using real time and digital technology where it is feasible to do so. Agree we will use this information to improve the overall customer experience and to make sure our services reflect our customers' convenience rather than ours. Comment: Agree but not it is unlikely to be possible to achieve 100% as there are increased costs in achieving higher levels of customer service. Most commercial organisations balance cost against customer service. Given the stated priority is to do so at lower cost, there will be limits on what can be achieved and it is not clear what these are. There should be better benchmarking of service levels within public and private sectors. At present satisfaction is at high levels and contact centres are high quality being CCA compliant (some award winning).

48. Services have already been reduced due to staff cuts. An increase in fully developed staff would be beneficial. Uncertainty of the future in the agencies does not help with staff retention.
49. Should make easier access for public to actually discuss issues with a person - not change all to on-line service.
Although any on-line service is easy option - it does not always work for everyone.
50. Single platform for all agencies with standard processes will deliver all the required benefits without mergers and job losses.
SSC will partly deliver these benefits
51. Slow down - Listen to all public employees (the experts) and the smaller company's reference what would be considered a good effective service.
52. Staff already work hard to deliver an outstanding service to customers, with expertise built up and transferred over time. Changes are already planned and implemented over time, for instance to comply with regulatory change. The country has sound vehicle and driving tests, efficient vehicle licensing and certification. We should protect these public services rather than risk a decline in standards and road safety by privatising them.
53. The current consultation on the future of VIC tests should be speedily concluded and VIC tests abolished. All ABI Cat C and Cat D vehicles should be required to undertake a new MOT prior to be returned to the highway. Dealers in Cat C and Cat D vehicles should be licensed by VOSA.
DfT should work with the ABI to agree an appeal process to have an ABI category removed from the V5 - at present vehicles with no structural defects are being written down as Cat D - for example, vandalism to paintwork.
54. The one problem we have is the customer behind the wheel of the vehicle. Also the technology we use in the vehicles to distract us. What needs to be done is a driver safety training test.
Every year our highway code improves and the way we drive and read signs are different to what they were years and years ago, but experienced and non experienced drivers are not keeping themselves up to date with any of the new



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changes and this could cause confusion and even accidents. What needs to be done is every 5-10 years the customer needs to take a refresher test on the Highway Code and a short driving test. Cars need to be tested every year to be safe on the road so why can't we be tested to see if we are safe?
the tests would involve a short multiple choice question just like the theory test (as that test even expired after 2 years if you didn't pass your practical test, so what changes in 2 years of not passing the test to being 2+ years driving a car) to give customers a reminder of the highway code. then a short 30 minute practical test of manoeuvres and signals and speed (this could be done by the DSA in a private ground like police car training or an examiner sits in the car just like the practical test), as drivers on the road today are not concentrating not obeying the speed limits and are not using their indicators or looking and caring about others safety, this leads to accidents. If the drivers fail their test then they are not permitted to drive until they pass, just like a car is not allowed on the road or be driven if it fails its m.o.t. when the test is passed then they can drive again. This may not change the safety as people will go back to old habits, but it will lower the amount of accidents on the road today. the cost of the tests can be the price of a m.o.t.

55. The whole of the civil service reform has to be based on offering a level of service that meets customer demand. It can be done electronically, but on the physical side availability of resource over a wider period needs to be made available.

56. Websites can be awkward to negotiate, sometimes hard to find exactly what is required. To this end a better search engine that actually comes up with what I'm asking for.

For an annual test do we need a paper certificate, vosa costs could be reduced and the test time speeded up simply by making it digital and possibly just a 'till receipt' printed from a portable printer.

Linking agencies ie VOSA and the DVLA so that in a cherished transfer I don't have to contact two agencies to tell them I have a private number plate....one could tell the other instantly digitally. this would solve issues at the annual test and ensure I had the correct documents with my vehicle

57. Yes - as employees of these agencies we are encouraged to comment in this consultation but the questions are tailored more to customers than staff. Give us a chance to put our personal opinions across.

58. yes, move the licencing side of DVLA over to DSA so DSA deal with the whole the A-Z of passing you test and getting a licence and person licencing part goes over to VOSA etc

59. Yes.. we need MORE government agencies and MORE staff, we cannot provide the service we are employed to do at the moment as the cuts and redundancies have had a huge impact on our customers

60. You must increase customer insight activity and be seen to be acting on it rather than merely paying lip service to it.



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

1. Would be grateful if you could let me know which channels the consultation document will be made available through apart from online? I assume there will be a press release to let the public know about it so they can seek it out.
2. 1 Yes combine forces
2 Yes work collaboratively
3 Yes drive out duplication and reinvention
Are all of these are functions of effective DfT management of agencies. ie better grip on business planning?
The cabinet office seems to be doing OK in delivering on the top 3 without requiring government departments to merge. My view is that merging of agencies will highly distract from the better delivery of the points above.
3. 1. I would like this response to be taken into account when you analyse all responses to the consultation exercise.
2. Personal declaration: I declare a personal interest as a civil servant currently working in one of the motoring services group executive agencies. I see no reason why this response should be excluded on those grounds. If any responses are excluded for whatever reason then can I ask you to make this explicit when you publish the official response to the consultation exercise. I would not expect a personal explanation but rather a public disclosure of your general approach to exclusions.
3. Overview: I welcome the fact that DfT is about to make explicit the broad strategic future for this group of executive agencies. When agencies were first established (by a Conservative administration) the intention was for Ministers and the parent department to have a hands-off approach to agencies. Agencies had to plan ahead for themselves, make their case and gather support - the agencies were responsible and in the lead subject only to parent departments and Ministers support. The current administration has backed away from that (in my view perfectly sound) approach and while they plainly have every right to make that change, by stopping agencies thinking for themselves with it comes a duty to outline an ownership strategy. A duty DfT has failed to pick up for 2½ years leading to drift and discomfort in agencies. So this consultation is welcome if overdue.
4. Cost / benefit analysis: Bearing in mind the experience of committing to introduce a shared service on the basis of a flawed business case (benefits all well and good in theory but never having senior management will to realise those benefits in practice), can I ask that you learn from that (and other) bad experiences. Not least because it is primarily the paying customers of the agencies and staff within those agencies who will carry the burden of implementation.
5. So when the response to the consultation is published it can only announce a provisional preferred option. To carry credibility the DfT response must also announce that this will be followed up with a thorough cost benefit analysis as part of a full business case. The preferred option needs to show a significantly better net present value over 5 years (the life of a Parliament) when compared to a do minimum option.
6. Risk: If this consultation exercise gathers sufficient evidence and opinion from a wide range of knowledgeable service users and service providers within agencies, it can lay the foundations for a business case that can chart the way forward for agencies. Certainty is desirable over the present doubt and we can wait 9 months for due diligence. But if the follow up to the consultation is



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superficial and driven by preconceived prejudice then you risk a repeat of the shared service debacle and waste of public money.

7. Accountability: Rather than wait for scrutiny to be imposed later when things start to go wrong a confident leadership would commit to holding their analysis up for independent scrutiny at a point in the future before irrevocably committing to implement a preferred option. Of inviting from either the National Audit Office or the Transport Select Committee an independent scrutiny of a full business case that sets out and tests the economic, financial and delivery case for a preferred option.

8. Conclusion: If you have to summarise this submission then please make that summary – before committing to change produce a robust business case to include a do minimum option and submit your assumptions and conclusions to independent scrutiny. You owe at least that level of effort to the millions of service users and the 10,000 staff in the executive agencies.

9. Challenge: I shall keep a copy of this submission. If the way DfT officials take this forward falls far short of what I am asking for (which is no more than evidence based policy development would call for anyway) I will write to my Member of Parliament and ask him to make a fuss. At the moment he happens to be a member of the Public Accounts Committee. Of course I have no way of knowing whether he would take this up. I am not intending to threaten or bully you by mentioning this, simply giving fair warning of how seriously I take this and how I am minded to follow through.

4. Although I totally agree that the reduction of any identified waste including the merging of agencies should be carried out. As a career civil servant I do not consider the wholesale transfer of services from public to private sectors as a good thing and so long as we provide the right service to industry I am sure that they would rather have the independence that we provide.
5. As above (x2)
6. As above, this consultation needs to be integrated into the Highways Agency future strategy.
7. As an employee of DVLA, I have been encouraged to participate in the consultation honestly. I hope the points below are helpful in the development of the proposals.

Broadly, I support the general principles in the consultation in terms of looking at ways to improve and modernise services, whilst ensuring they are delivered in a cost-effective way – I doubt anyone would disagree with this ethos. However, I think there are several issues with the consultation that undermine the policy development process:

1. Consultees need a clearer understanding of what options are being considered and the desired outcomes to respond effectively. Currently, the consultation contains much rhetoric around 'improved services' but little concrete information about options, proposals or the analysis supporting these. Therefore, the reader is unable to give a considered reply – a consultation document based around rhetoric is likely to receive rhetoric in return, which doesn't really facilitate effective engagement or constructive dialogue. The Consultation Principles recommend that "Sufficient information should be made available to stakeholders to enable them to make informed comments" – I don't feel that this is the case here

2. This lack of clarity makes it difficult to determine what the impact is likely to be on DVLA. There's mention of merging back office functions/ rationalising the number of agencies but no clear indication of what this might look like. Again, it's hard to answer intelligently on whether we agree with the principle of restructuring in this way when we don't know what options are being considered. Mentioning this restructuring in the document is enough to give uncertainty over job security



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but no detail on what the current thinking is. I think it's unfair to ask for views on this when there seems to be little transparency over what is being considered

3. The consultation raises the broader issue of the role of government in providing public services. What is the rationale for these services no longer being a necessary function of government and delivered elsewhere? What evidence is there that mutuals work and will achieve the strategic goals? The document should be more transparent in laying out the costs, benefits and risks of offering services in new ways. For example, what is the current reason for having a mix of government-owned and privately-owned testing stations? If this is for a valid reason, then what are the risks in completely outsourcing? This detail is lacking. Without being given more information, the reader can't provide sensible views as to whether new business models would give an improved service to customers, even if that is the intention. Without this detail, it's difficult to see past the cost-cutting motive

4. P.11 of the consultation document explains that the majority of services are funded by customer fees. If a primary driver of the strategy is the reduction of service running costs, can we assume that a reduction in running costs will lead to a reduction in fees, if Government only provide a "small amount" of funding anyway? Linked to this, if we use digital to drive our costs down (p. 17), isn't there an argument that this is passed on to the fee-paying customer? This should be expanded upon to give greater transparency around intended outcomes

5. Guiding principles: Is there a potential discrepancy between "putting customers/businesses at the heart" and working with broader range of partners to deliver services? The strategy states a commitment to ensuring customers receive a first class service, but if this service is provided by those external to government, what influence do we have to ensure this is at the desired standard? Have the risks been considered here? Again, consultees should be provided with more information around the thinking behind this

6. The lack of impact assessment is a drawback linked to all the points above. At what point will an IA (or more likely multiple IAs) on clearer options be made available and will there be another consultation at that point? This is even more significant for the VCA alternative model due to the suggestion that this change will be decided upon and delivered quickly – will there be a further consultation on the options here? There is an indication on p. 19 that some proposals will be subject to more detailed consultation, however the reader isn't given any further guidance as to which proposals this concerns

8. Before looking at merging you need to ensure that the existing bugs are removed, old systems looked at from top to bottom and invest in new technology to ensure they can cope with any change in procedures

9. Concerns outlined previously. Lowering of standards, risks to staff and an erosion of working environment.

10. Encourage Innovation in the Agencies, reward Agencies and People who deliver step change.

Don't squeeze the employees (financially) so hard they are forced to leave the public sector, when they are gone they are gone for good and Agencies will be being run by Contractors and Consultants.

11. Having read the consultation document, I would like to make the following comments: - Privatisation/outsourcing Although there is a perception that selling off a lot of public service functions to the private sector saves money, we are getting repeated reminders that this often is not the case. A recent example is the G4S debacle at the Olympics. This exemplified what public embarrassment can be caused when such functions are entrusted to large, private, profit-driven companies. A repetition of such a mistake is unlikely to



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serve the interests of the motorist or enhance their customer experience. Instead it can (and has) give the perception that these corporate juggernauts can default on their responsibility to the general public - and not ever really be held accountable for it. Rationalisation This term can often herald the closing/merger of agencies that are providing an essential service to the public, and the attendant loss of a wealth of experience when the staff affected by these measures either jump ship or are made redundant. A historically recent example of this is when the former Vehicle Inspectorate was merged to form VOSA. This merger: - caused years of upheaval for the workforce, did not provide increased comfort and convenience for the customer, contributed heavily to the newly formed agency going in to "deficit" a few years later - necessitating a recovery plan and austerity measures. The above example is not a good advertisement for future measures that may be about to be repeated. Money was not saved - especially when the consultants were brought in. Closure of premises. Giving VOSA as an example, closure of premises (e.g. test stations) should not always be viewed as a viable idea. For example, newly built test stations (such as - Avonmouth) are only a few years old. It is unlikely that the money will be recouped by selling off such premises for the private sector to run. There will also be the attendant casualty to the motorist (e.g. the smaller goods/PSV operators and owner/drivers), who may feel that they are treated unfairly by the big companies running the next generation test stations, and may also perceive that the new privately-run concern is trying to kill off these smaller operators by providing them with a less impartial service. The above comments are not intended to be from a customer's point of view. However, having had a total of more than 15 years experience, in 2 separate DfT agencies, the above remarks serve as a reliable guide of what measures should NOT be repeated again. Intelligent evolution (not revolution) should be the watchword here.

12. I am extremely concerned that the government is manipulating this consultation by not including questions on the potential privatisation of driving tests, this is a highly dangerous move that will have severe impacts on the standards of drivers that are given licences as the private companies will undoubtedly lower the standards in order to entice candidates to use their services in preference to a competitor. Additionally allowing private companies to issue licences to driving instructors will significantly lower the standards of instructor as the companies will 'guarantee' passes again to entice candidates to use their services. Stating that these companies will be monitored is only a smoke screen as they can not be monitored 100% of the time, they will act correctly while being monitored and revert to lower standards the second the monitor leaves the premises.
13. I believe it would be dangerous to allow private companies to start doing testing and this should remain a remit of the government as there would definitely be a differential in quality of testing and possibly pricing (look at the driving instructing industry where prices and standards are very very significant despite check tests this cannot be properly monitored) you will always get unscrupulous people and although I realise dsa have had some dodgy examiners overall the majority do the job as they wish to improve road safety and assess candidates on their ability to drive and not how much profit to be made or targets to be hit!!!
14. I believe there should be more flexibility between operators and VOSA while the ATF transformation is still on going.
15. I feel strongly that the role of civil servants provides a level of impartiality and integrity that is unaffected by conflict of interest where commercial bodies are testing themselves.
16. I find your car taxing online a very easy system and if ideas along this line for all



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other agencies would be good. Maybe you need to promote online services at your agencies. Flyers handed to the customer at the end of the test or the service provides by staff on the shop floor. Flyers left for people to pick up don't always get picked up if there was one to hand out with paperwork at the end of the service to everyone maybe this would help promote your online services. Basic instructions where to go on the website and a talk through guide always help as people start to struggle and give up on it and go back to the old way. Not just a web address and nothing else as some people struggle with this.

17. I implore you to put safety before savings. Do not put political dogma before people's lives and livelihoods. Your decisions will not only impact on the number of people killed and injured on our roads, it will also decide the future for tens of thousands of public servants and their families. It is a fact that the majority of people made redundant will earn a lot less than the people they previously worked with who have kept their jobs. This often leads to loss of pride, loss of confidence and even suicide. Your digital strategy is a case of putting all your eggs in one very risky basket and despite the propaganda it actually limits choice.
18. I think it is a good idea.
19. I would hope that you take into consideration the findings of secretary of state for transport, Mr John Macgregor, who back in the 90's carried out a consultation and then scrapped plans to change the test into the private sector as he was concerned about the integrity of the test.
20. If I have read the following correctly "Consult on further options for the delivery of testing." Then I assume you mean privatising statutory annual testing for HGV, Bus and Coaches, a truck or bus is not a car a truck weighs up to 44 tonnes. I therefore appreciate a totally independent government, delivered assessment of these vehicles roadworthiness once a year.
21. If this is designed to cut costs and staff, you can only cut so much before there are insufficient staff numbers to provide a good service, and the system falls over. The country is getting close to crisis point in many areas and the Civil Service is no different. This worries many of us but there is little we can do about it.
22. I'm sceptical that the effective overhaul won't just be a huge waste of money but impact on the integrity of all services provided by government.
23. In relation to VOSA and the heading; Define our organisations to deliver better services.

I have been involved in a Road Policing enforcement role for nearly 40 years. The only enforcement presence on our roads is that of VOSA, as the police no longer patrol the UK road network as rigorously as was done before the introduction of HATO's.

This has allowed vehicle operators to be non compliant in a number of areas including drivers hours and operator licensing. It is a fact that VOSA's roadside detection rate is minimal and is in single figure percentile of vehicles stopped. There is a much more effective way.

This includes using technology and experienced investigators, who are properly trained and using a full range of powers available to VOSA. This includes the use of Proceeds Of Crime Act (POCA) 2002, powers which VOSA already have.

There are a significant number of people who stand to make vast sums of money from being non compliant. This illegal activity funds lifestyles way above that which a compliant operator could expect to have. POCA is part of a Government Home Office strategy designed to remove the benefits of criminal activity by taking away Criminal Benefit. This in turn is used by enforcement authorities authorised under the Act, including VOSA, to further investigative work of this type. VOSA have already had successful POCA Confiscation Orders, with further



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pipeline work coming to fruition.

Methodology is around drivers falsifying their drivers hours, so they can drive for longer periods and reduced rest times. This alleviates the need to pay for two drivers to do these journeys legally. The operator pays the illegal driver "overtime" and pockets the cost saving of a second driver. Viz VOSA v Boyle Transport Ltd and other cases. This is a very simple illustration. The cost to other road users is immense. DfT are already well aware of the consequences of tired drivers, human and economic cost.

There is considerable evidence to show that Traffic Commissioners are not fully effective in stopping "phoenix" type operations where a non compliant operator is removed from the scheme and because significant Criminal Benefit has been made a relative can then obtain an Operator license and continue to operate without any redress. The Traffic Commissioners cannot deal with those who operate outside the O'license system, the xxxx (personal details redacted) case is a case in point.

24. In respect of taking testing to the customer, although I can agree with the principle, I consider it important that testing continues to be carried out by properly qualified, independent examiners. Additionally customers should have access to all facilities generally available at a designated Driving Test Centre, such as a suitable waiting area with toilet facilities. There has been talk of privatisation, but I believe our service of providing car tests needs to remain as a central provision, with standard procedures, so every individual is assessed to the same standard. Moving any part of the driving test to alternative examiners could have a detrimental effect on safe driving. From personal experience I used to work as an instructor based in Salisbury, which is close to a number of Army bases. The Army provided their own examiners, who appeared to work to a lower standard than DSA. Having met a number of pupils who had previously taken a test with the Army they told me that there was only one route which was taught to them by their instructors. Additionally I considered their driving standard to be well short of that expected by a DSA examiner.
25. It is important periodically to review the way that any organisation does business. DSA, as a trading fund, is not a burden in the general taxpayer but covers its costs from fees paid for its services - primarily driving test candidates and Approved Driving Instructors (ADI). It is a tightly run organisation, which made efficiency savings of £2.8 million in 2011/12 (as stated in its Annual Report And Accounts). Its core roles - delivering the driving test (theory and practical) and regulating the ADI industry are undertaken professionally and efficiently. The driving test, in particular, is regarded highly throughout the world. If there are more efficient and customer-focused ways of delivering these services, DSA should adopt them. But it is important that the valuable skill sets, expertise and knowledge currently enjoyed by the Agency are not lost in the course of changes that are made in the future.
26. It makes economic sense to rationalise motoring bodies, but integrity must be considered
27. It seems to be driven by a wider Government agenda of privatisation/mutualisation and cost reduction, not organisational delivery with customers at the heart.
28. it would be wrong to privatise driving tests as they would not be carried out to the same level as they are now
29. Its all about saving money, nothing else!!!!!!
30. KEEP DRIVING TESTS RUN BY THE GOVERNMENT PRIVITISE THIS AND ALL INTEGRITY WILL BE LOST , THIS WILL BE OPEN FOR ABUSE
31. Lets allow the agencies some breathing space to continue the good work that has



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already begun in making savings before rushing into a new set of changes which whilst they sound may make savings may fail to do so.

32. n/a (x2)
33. no (x8)
34. none (x3)
35. Not really confident that this strategy will actually benefit me as a customer, nor that it will be implemented in a reasonable time frame, ie one that will make any difference in the coming year or so.
36. Overall the consultation document is too vague to provide any real input. This should have been conducted once some options were developed.
37. Please let common sense prevail, and involve the people whose lives and working practices you are about to change for whatever reason. They may actually come up with some good ideas.
38. Privatisation is not the answer to the problems that exist and more will develop with costs going up and not down
39. Privatisation of key road safety organisations is a very dangerous path to tread considering the roads kill more humans than anything else in our country. The public will hold any government responsible who affect road safety in a negative way.
40. Privatisation of the driving test will put the integrity of the test and the current high standard at stake
41. Profit and road safety are mutually exclusive objectives. It is comparable to Health and Safety at Work in that government needs to protect citizens from those who take less care by setting standards and enforcing them. There is a role for some profit oriented entities in the road safety world but they need to be balanced off by others who are motivated by the greater good of the community. The government should be seen to firmly position itself in the interest of the community rather than profit in this area.
42. Putting business at the heart ignores road safety. Put road safety at the heart and build suitable business models round it.
43. Rather than a mix of ideas and aspirations, some of which appear to duplicate work elsewhere or reflect activity that has already started, the future could have been shaped more effectively by engaging with a specific range of stake holders. The engagement should have given the opportunity for suggestions to be made, supported with evidence which would have allowed smooth and quick progress to the decisions stages, followed by a planned implementation. Care will need to be taken in managing any contractual arrangements, particularly with the increased scrutiny that is likely after the publishing of the findings of the Laidlaw Inquiry, following the cancellation of the award of the West Coast Main Line franchise in 2012

Annex attached:

(i). In reviewing this consultation, it can be suggested that decisions on some of the subjects have already been made. For example in the section titled "What we will do to deliver that vision" on page 17, statements are made in support of "maximising the digital delivery of services to motorists". Thus parts of this consultation could be suggested as asking "how" proposals will be implemented, rather than "should" they be implemented. (ii). Much of the justification for change in delivery is by provision of government services digitally. It is of note that no reference is made to the "Government Digital Strategy" document within this consultation. This document includes provision of suitable access for those, who by being unable to access services digitally and thus being potentially



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disadvantaged, under the “assisted digital” policy (1). The assistance offered by “assisted digital” is assumed to meet the obligations under the Equalities Act 2010. Under Equalities legislation customers should be treated according to their diverse and equality needs i.e. not insisting that customers access services “on line”; instead providing a suitable alternative arrangement that could be face to face or on the telephone. It is also of note that the Department for Transport (DfT) has published its own Digital Strategy on December 20 2012- the existence of which is likely to have been known at the time this consultation was drafted and thus should also be referred to (2). (iii). The wording of “HGV, bus and coach” used to describe heavy vehicles, for example on page 6 paragraph 4.4 of the consultation, is unclear in the use of “bus and coach”. The vehicle testing of buses and coaches is rooted in the same legislation and is fundamentally the same process, varied for specific vehicle types, thus basically is the same test. It would have been clearer to use a definition such as is found in the Traffic Commissioners’ Annual Reports 2011-12 which states “heavy goods vehicles (HGVs) and of buses and coaches (public service vehicles or PSVs)” (3) giving the easy to use abbreviations of “HGV” and “PSV”. (iv). In describing “Why Motoring Services matter” on page 10 paragraph 6 line 2 of the consultation document it is of note that there is no reference any other regulators e.g. Traffic Commissioners (TC). It should be noted that TCs use information including that arising from vehicle testing activities included in this consultation to contribute to their regulatory activities. (v). Page 11 of the consultation document states that “We spend £930m a year, most of which is paid directly by those using our services”, “with a small amount coming from government central funding”. These statements suggest that in the main only users pay for services used. Therefore provision of services by the agencies forming this consultation cannot be considered a burden on tax payers. In fact, the opposite conclusion could be drawn, in that the public, whether they use “motoring services” or not, reap the benefits of safe vehicles and drivers. This is whilst making a minimum financial contribution to this through taxation. It is likely in that the users of the services will in the case of business pass the costs onto the end user of their products e.g. vehicle approval by the Vehicle Certification Agency (VCA). This means the end user is indirectly contributing to the service used. In the case of individuals, their own resources are used to obtain the required service e.g. a private motorist taking a practical driving test, meaning the user will be making a direct contribution to the services used. The VCA appeared to cover its costs from income received in 2011-12 (4). The Driver and Vehicle Licensing Agency (DVLA) also appears to cover much of its costs from fees (5). Additionally the Vehicle and Operator Service Agency (VOSA) and Driving Standards Agency (DSA) retain trading fund status which gives an obligation of covering costs from fees. Therefore it should also be noted that each of the Agencies are just that-agencies of a government department meaning that they are organised to cover the majority of costs of providing services through fees charged. The public contribute towards these agencies either by directly purchasing services, or indirectly by purchasing products from businesses that in turn use the motoring services agencies’ services. It is acknowledged that there is a small amount paid to the agencies from general taxation to cover activities including Enforcement-these are not part of this consultation. (vi). The consultation gives aims on page 17 that appear to be covered in activities that are being consulted on separately. In particular this consultation states that “DVLA is working with the Government Digital Service to maximise the digital delivery of driver and vehicle licensing”. This work has already started as can be seen by DVLA’s consultation on Vehicle Online services dated 01 October 2012 that closed on 12 November 2012 (6).



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This covered activities including expansion of current electronic provision, to include vehicle registration and registered keeper transactions, and vehicle registration number assignment and retention transactions. Thus inclusion of activity that is already taking place elsewhere in this consultation is a duplication that should be removed. (vii). Page 17 also includes in paragraph 1 at the fourth bullet point a proposal to “deliver an innovative partnership” “to ensure motorists’ insurance premiums are properly priced and to reduce the number of claims that are declined or adjusted”. This does not appear to be something that will contribute to the aim shown at the head of the section “Be at the forefront of digital services”. Additionally insurance provision is not made by either the DfT or any of the Agencies included in the consultation. Therefore there is no need for communication with them on this issue. The proposal is not relevant to this consultation and should be removed. (viii). Paragraph 3 continues on page 18 with a bullet point that discusses the vision for taking practical and theory driving tests closer to the customer. It concludes with the statement “where this can be achieved without threatening the integrity of the driving test or resulting in higher fees to the customer”. Where the test candidate is not co-located with the examiner or theory test provider there will be an element of cost for all parties. This is paid for by the user in travelling to the site of the test. Alternatively, as already outlined, the cost of sending the person conducting the assessment to the location of the user is recovered through the fee that the user pays to access the service. It is not clear how costs to individual users can be reduced in this part of the service provision. Where there are a number of customers at a location it may be possible to reduce costs by the supplier making a single journey to the users, and the users making shorter journeys to the point of supply. However, it is unclear at this stage how these economies could be realised, which will contribute to the cost cutting aims of this consultation. Evidence should be supplied to demonstrate the advantages of this proposal. It should be noted that publicity in the form of a bulletin dated 10 July 2012 has already appeared on this activity suggesting that the pilot has already started (7). A further announcement on 8 January 2013 indicated progression in providing driving tests from a third party sites starting in February 2013 (8). It is inefficient and an administrative burden to consult on something where decisions have already been made. (x). Page 19 in the last paragraph includes the statement “so we can continue to move service standards forward”. There is no mention of from what standard (i.e. a starting point for improvement) or an end point where the improvements have placed a service at a desired state. Without this information it is not clear what improvements are acceptable over what timescale. As an illustration of what should be demonstrable, the current service should be better than that delivered previously. An example is contrasting the process of booking a practical driving test by an applicant in 1936, 1981 and 2013. In 1936 I suspect this was by documented transaction, by 1981 much was still reliant on posting documents including methods of payment. In 2013 this can be done digitally.

44. Road safety is crucial. VOSA has proven themselves to be professional, effective and efficient since becoming the 1st agency in the early 90's with loyal staff passionate about the service they give to the customer.

Including a wider range of non government partners may risk this fair and open safety checks on the industry.

45. See answer to Q 16.
46. Seem like a tick box exercise
47. should not outsource or privatise agencies that have connection to the issue of legal documents as this can lead to fraud and corruption



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48. Slap dash and led by people with no proper experience in the fields they are changing.
49. Some functions such as the driving test must not be outsourced to the private sector. Research shows that drivers who take a test under 'delegated' arrangements are more likely to be involved in an 'at fault' crash within the first 6 months of passing their test compared to those who took a DSA test.
<https://www.gov.uk/government/publications/delegated-driving-examiner-research>
Road safety must take priority over cost savings.
There is much that can be saved and improved by listening to staff working in the department and its agencies. DfT must seek to make those improvements as a priority, rather than outsourcing work to the private sector.
50. The agency (DSA) has to move with the times and embrace change. This is already happening in many areas, one example being the development of the tablet pc. I believe the agency has become more efficient in recent years but more could be done, and this consultation I hope will raise many options. Some logical changes to T&S could save vast amounts of money, two examples are
Scrap the £4.25 subsistence payment. If an examiner is going to buy lunch or bring lunch to work this is an expense they already have and I can't see why the agency makes this payment.
Mileage claims when travelling from home to a detached test centre when the mileage claimed is less than the examiners normal home to permanent test centre.
We have discussed the consultation within the office and the main area of concern is the integrity of the driving test. If the test is privatised the number one priority for that private company is the profitability of its business. This one issue is a fact because the company is a business not a charity or none profit making government agency.
xxxx (personal details redacted) the Deputy Director of Motoring Services commented on the issue of integrity of the driving test during her web chat on 11th of February.
Delegated examiners are trained to the same level as DSA examiners. In line with DSA examiners delegated examiners are routinely subjected to quality control accompanied tests and are required to undertake EU 3rd Directive periodic training.
Integrity is really important in the services we deliver. We are asked to hold statutory records and undertake statutory tests, many of which contribute directly to keeping people safe on the roads. We already provide some of our services through the private sector, such as MoT tests and the driving theory test. In ensuring value for money we would never wish to sacrifice quality and high standards. It is incumbent on us to make sure that the way we design and deliver any change retains those standards.
The integrity of the test is really important to the service. We already have some of our testing delivered with other partners. And have done for some significant time. If we do look at options for delivery of the practical driving test one of the key issues will be how we ensure high quality standards.
These comments appear to be the correct attitude towards integrity but delegated examiners working for private companies are already under pressure from their employers to pass the required numbers of drivers they need. This is supported in the agency research in traffic accidents involving PCV candidates assessed by delegated examiners. CBT's are also not conducted in accordance with the standards set by the DSA, example being the length of time the assessment lasts. I believe this disregard by private sector partners of the correct standard is wide spread. I have heard comments to this affect by numerous examiners over



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numerous years. It appears this opinion is wide spread but our private sectors partners are able to carry out tests to the correct standards when they are have there statutory quality control tests. One standard for them another standard for us (DSA).

In conclusion change is needed but integrity must be upheld above any government initiative to out source to private sector partners.

51. The approach seems to be aimed far more at saving money than improving road safety for all categories of drivers/riders and vehicle owners.

52. The approach seems to be led by principle but without evidence, example or business case. Not clear the case for change has been articulated in the consultation

the consultation sets out the strategic direction for all motoring services relating to the testing and licensing of drivers and vehicles. This is called the 'Motoring services strategy'.

Comment: how much have motoring agencies been involved in developing this vision? There has been virtually no discussion or views taken from DSA on the consultation.

There are currently 4 executive agencies that provide motoring services for the Department for Transport:

- DSA
- DVLA
- Vehicle Operator and Services Agency (VOSA)
- Vehicle Certification Agency (VCA)

Comment: Different agencies serve different customers providing different services. Three are trading funds and DVLA is a tax collector. What is the synergy between these motoring services operations? Where do the boundaries need to be to ensure regulatory integrity and legal compliance?

The Highways Agency is not part of this strategy. It's subject to a separate strategy that was published in the 'A fresh start for the strategic road network' report.

Comment: Not sure why Highways agency is part of separate strategy – rationale is not clear.

Our vision

Our vision is to have motoring services with the customer and businesses at their heart.

Comment: I think this is the wrong vision. This is necessary but not sufficient. Primary vision should be delivering best road safety in world and helping to reduce carbon usage by vehicles and motorists (to meet international obligations). The priority should be 1) Road safety 2) Improved environment 3) having customers and businesses at their heart

There are 6 actions that make that vision a reality:

- be at the forefront of digital services - agree
- support economic growth and vehicle manufacturing by reforming the way the Vehicle Certification Agency works – what is the evidence this will work?
- bring the driving test closer to customers – Is there market research to show customers want this and are prepared to pay for this if it increases cost?
- transform HGV, bus and coach testing – to what?
- provide better customer services – to what? Customer services already meet high standards and are multi aware winning – exceeding standards in many private sector organisations.
- define our organisations to provide better services- what is the deficiency; what does better mean?

No final decisions have been taken yet, but no change is not an option. –



Comment: No change should always be an option. Setting this out up front undermines the notion of a genuine open minded (and not pre-determined) consultation.

Principles

The actions are guided by the following principles:

- putting the consumer and business at the heart of what we do – comment: at the moment we put ministers at the heart of everything we do

- rationalising the number of agencies and bodies – comment: what is rationale? The aspiration should be the customer does not see or know about the boundaries but there have to be boundaries.

- working with a broader range of partners – comment: this has benefits but also has costs, such as tender costs, contract costs, loss of flexibility, long term financial commitment. What is measure of success? Like the NHS, any competition should be on quality, not price.

53. The digital strategy of everything that is delivered being led by what best serves the end user is exactly right. Therefore it seems inconsistent and wrong-headed to do precisely the opposite with the structure, by taking away each agency's dedication to its specific set of users. That would transfer cost and resource to customers from government. And it is precisely opposite to the stated aim of the proposals - to improve convenience and service.

54. The governments strategy is aimed at reducing the deficit by cutting costs and this will not lead to better services to the public.

55. The impact on road safety of breaking VOSA's testing functions from its enforcement activities should not be under estimated.

This duality of function provides necessary opportunities for efficiency and flexibility in our use of resources. The staff who test vehicles are a key resource to identify shortcomings in vehicle maintenance and the provision of this intelligence to our enforcement effort.

Is it reasonable to expect outsourced or 'authorised bodies' to keep providing this intelligence to VOSA, on customers who can take their vehicles elsewhere if they think the person or company testing their vehicle is passing 'negative' information about them, if it means they will lose business, market share and therefore test (and associated) income.

VOSA is half way through delivering our own transformation plan which will deliver:

A flexible reduced overhead work force ready and willing to conduct heavy vehicle tests when the private operator of the testing site requires to meet their customers needs

An enforcement model that effectively uses information to target the serious and serially none compliant and ensure data is used to target our resources to have an even bigger impact on road safety for every pound spent

Even more transparency about industry performance via open publication allowing the supply chain to exercise their corporate responsibility to make informed decisions to use operators committed to road safety

Finally

VOSA is a trading fund and while we derive our money from test fees we have a good record of keeping fees as low as possible. We have the network, expertise and experienced staff to successfully complete the transformation programme I as a VOSA Corporate Senior leaders have helped develop with our Board. I believe a VOSA transformed will achieve the aspirations for digital services, transformed heavy vehicle testing and better customer services contained in the consultation.

56. The problem with the strategy is that it is not backed by evidence. A series of assertions are made and outcomes are just given



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57. The public sector was always regarded as a good industry to work in, being in charge of the main services of the country, police, driving, tax etc. I believe this is the way forward and nothing should become private, the government run the country and should continue to show this by having its agencies for each important service provided in the country.
58. The spirit of this consultation is unusual in its openness. Motoring Services Strategy gives us the rare opportunity to look at road safety overall in the UK. Whilst we don't do a bad job on road safety, considering the overcrowding and design of our roads, many of which were not built with modern vehicles and population levels foreseen, we could still do better. Cuts in Police budgets, road repair budgets, lack of personal money to ensure cars are well maintained and drivers are both legal and insured, have all taken their toll. Recent KSI stats evidence this fact. We need to keep an open mind when revisiting what we do and how we do it, but change for the sake of change is inappropriate and potentially dangerous.
- One thing which stands out about this consultation, consistently and above all else, is the focus on contracting out or privatising. This hints at a braveness in current government which has not been obvious before. After all, who would ever vote for the party who brought in changes which compromised road safety? It could take down a political party for a generation or more. In the light of this bravery and the fact that cost reduction is not the sole stated objective of MSS why not look at real road safety initiatives such as the compulsory retesting of qualified drivers to maintain driving standards. That would make a real difference to the KSI's. Being a different product from our usual menu, maybe this is where the private sector could become involved?
- Finally, DSA Test Centre Managers engage regularly with ADI stakeholders. A great many of these have independently raised concerns about the outcome of MSS compromising test integrity, the restriction of the availability of tests to independent ADI's / smaller schools, and about the financial mechanisms available to reward private business shareholders without either costing the candidate more or having services cut.
59. The strategy as it stands is too 'all encompassing' and therefore results in a pressure to serve too many masters. Whatever results needs to be broken down into meaningful deliverables that are supported by managers who have a clear understanding of the strategy; and a willingness to lead and manage (something that is, at present, lacking)
60. The views of the agencies and their staff who actually carry out the front line work should be listened to. Much expertise may be lost as the result of wrong decisions.
61. There are opportunities for change in the way in which elements of service are delivered. However, it has to be remembered that some of our key partners out there, e.g. the driver training industry, are very nervous of change. Some are very keen and ready to go. Some, particularly the micro and small enterprises feel very vulnerable. There is a good argument for a Chartered Institute of Driver Training, which could ultimately take full responsibility for the delivery of standards etc. However, the degree of fragmentation and in-fighting that currently exists would mitigate against that at this moment in time. Any proposals could, however, flag that up as a medium term intention. That would focus the mind of the key players.
62. There is little evidence that there is any particular demand for "Taking Testing to the Customer" at sights such as Halfords. Customer facilities will be poor with no proper waiting /seating area and very importantly Toilets!-absolutely essential at a test centre I would say. I believe most people given the choice would prefer to use a proper test centre even if it involves travelling a bit further.



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Staff facilities will probably be inferior too, and if examiners are working on their own, there won't be the usual interaction amongst staff to discuss the finer points of assessment which is the main part of our job.

63. They are fine.

64. This is not a well outlined strategy and the consultation is quite sparse. Presumably this is a deliberate approach, clearly aimed at only includes money saving measures. I would have hoped that more thought would be given to possible effects on staff well-being and road safety.

65. To maintain integrity of the driving tests you need to stay transparent, to many third parties could have a serious impact on the integrity of the driving test and how it is delivered

66. Very concerned with regard to the integrity and uniformity of the test, should outside bodies conduct driving tests.

67. VOSA is half way through delivering our own transformation plan which will deliver:

- A growing partnership with the private sector appropriately utilising each others skills. To date over 300 businesses have become part of the ATF network and over 60% of our heavy vehicle tests are being conducted at private sector premises delivering our pre MS strategy commitment to bring testing closer to our customers

- A flexible reduced overhead work force ready and willing to conduct heavy vehicle tests when the private operator of the testing site requires to meet their customers needs

- An enforcement model that effectively leverages data to target the serious and serially none compliant and ensure we use data to target our resources to have an even bigger impact on road safety and staff synergies which enable cross boundary support to cope with times of peak demand or minimise duplicated travel in more rural areas.

- Even more transparency about industry performance via open publication allowing the supply chain to exercise their corporate responsibility to make informed decisions to use operators committed to road safety

VOSA is a trading fund and while we derive our money from test fees we have a good record of keeping fees as low as possible. We have the network, expertise and experienced staff to successfully complete the transformation programme we as VOSA's Corporate Senior leaders have developed with our Board. I believe that VOSA has an excellent record in continuous improvement to meet customer needs and that VOSA has the skills and, if allowed to do so, ability to deliver continuous improvements to meet customer needs in a ways that ensure our aims of "saving lives, safer roads, cutting crime and protecting the environment" are not merely empty words.

68. We believe the fact that we as senior leaders within VOSA have taken the opportunity to respond to the consultation demonstrates our confidence in the future direction that has been set for our organisation and our belief in what together, leadership, management, staff and partners it can achieve.

VOSA is half way through delivering our own transformation plan which will deliver:

A growing partnership and co production with the private sector appropriately utilising each others skills. To date over 300 businesses have become part of the ATF network and over 60% of our heavy vehicle tests are being conducted at private sector premises delivering our pre MS strategy commitment to bring testing closer to our customers

A flexible reduced overhead work force ready and willing to conduct heavy vehicle tests when the private operator of the testing site requires to meet their customers



Department for Transport

MOTING SERVICES STRATEGY CONSULTATION

Summary of responses - Employees

needs

An enforcement model that effectively leverages information to target the serious and serially none compliant and ensure we use data to target our resources to have an even bigger impact on road safety for every pound of tax/test fee payers money we spend

Even more transparency about industry performance via open publication allowing the supply chain to exercise their corporate responsibility to make informed decisions to use operators committed to road safety

Finally

VOSA is a trading fund and while we derive our money from test fees we have a good record of keeping fees as low as possible. We have the network, expertise and experienced staff to successfully complete the transformation programme we as VOSAs Corporate Senior leaders have developed with our Board. We are confident a VOSA transformed will deliver the aspirations for digital services, transformed heavy vehicle testing and better customer services contained in the Motoring Services Strategy.

69. We talk to the RHA and FTA but there should be a process in place to capture the greater number of smaller customers. I do not believe that a consultation process is the best way to seek views and feedback from the smaller customer. it is worth noting that the smaller customer in terms of numbers outweighs what are considered the larger operator.

70. Where will the results be published?

Will everyone who has given an email address be alerted to when the results are available on-line?

Over what period of time do you hope to achieve your vision?

71. Whilst appreciating the Government's ambitions to make services available online, I hope that this would not be used as a tool to drive down headcount in the Agencies or DfT itself.

Whilst services should of course be offered in as an efficient a way as possible, I don't feel there would be any benefit to 'UK plc' from reducing headcount in this way. The last thing the country needs in the current economic climate is for more people to lose their jobs unnecessarily. This would merely serve to increase the amount spent on redundancy payments, and would drive up the numbers of benefit claimants.

The Government has a valuable pool of staff, who should be utilised at every opportunity, rather than being gradually eroded through privatisation and mutualisation.

72. Whilst I agree that the service and procedures currently provided can be improved and should be reviewed, I do not believe there is any place for the profit seeking private sector to be involved. The driving test is provided as a public service and in my opinion should remain so. We all know that in a private sector business profit is king, we only have to look at what has happened to the utility companies to see that in a time when they are making record profits for there shareholders, poor people cannot afford to turn their heating on. I also think private sector involvement would impart on the integrity of the test.

73. Why do people travel from around the world to observe and learn how VOSA works on HGV testing you cannot help us. In high esteem if your goal is pure profit - privatisation.

74. yes please leave vosa and the other agencies to carry on delivering the quality of service that they provide (x2)



Department for Transport

MOTORING SERVICES STRATEGY CONSULTATION Summary of responses - Employees

75. Yes the approach seems to think that by adding more 3 parties that this will somehow improve services. I could not disagree more. Increasing 3rd party involvement adds another layer of decision making and reduces the effectiveness to respond to customer demands.