

#### 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. Abolishing the Tax disk, and paper counterpart driving license will greatly improve organisation with licensing and keeping a car on the road. Perhaps even using a system like used abroad, not using a tax disk but using a "pay as you drive" system, making taxing your vehicle fair for the majority of drivers who vary their mileage. As well as having fair insurance quotes for the younger generation, having to pay in excess of £3000 for a years insurance is completely unjustified, a re-think would be brilliant.
- 2. allow people of all disabilities to understand what you have on the website.
- 3. Any increase in digital services will be a good thing as long as the services provided are intuitive and user-friendly.
- 4. At this stage I'm not sure
- 5. Being on line means I can deal with any matter any time of the day.
- 6. Digital services are good but my experience of Government use of computers is they make simple tasks more difficult than they need to be.
- 7. Even though I am reasonably computer literate I find moving services to a purely digital format offensive. The move to digital removes knowledgeable assistance (trained staff) and replaces them with an FAQ or a 30 minute wait to speak to someone on a premium rate number. It forces citizens to spend personal time on their own computer, filling out incomprehensible forms that someone else used to complete for them. These services usually use non compliance fines, as stick to punish citizens for not filling them out properly. At some point (when the service is later outsourced and the Government cash in) this other company will start charging separately for the services that used to be paid through taxes. None of the cost savings achieved will ever come back to me as a tax payer.
- 8. existing services are all I require
- 9. I agree that the agencies should seek that all their services be delivered by digital technologies. I am aware that DSA is very nearly achieving that and VOSA still have a long way to catch up but seem to be getting switched on to it. I am surprised that DVLA need to recruit over 400 staff in Swansea to replace the work of the closing Local Network. They should be challenged to drive in the digital solution, including the abolition of the tax disc and required to reduce staffing in Swansea. It seems that they always promise to reduce numbers employed in Swansea but never do so. Are staff being recruited aware that their jobs should be short term?
- 10. I hope so
- 11. I hope so but I have often found that you usually cannot get a quick response. It normally takes about a week to get a response. It would be nice if you can give assurance that the turn around time for getting a response will be 24-48 hours for example. Also, providing a telephone number so that the customers can still speak to a person if necessary would be good.
- 12. I hope so but it means that a lot of private individuals will have to be very computer literate. Please do not assume that most people are as this is not the case
- 13. I prefer being able to speak to an individual rather than a computer as this gives me as a customer reassurance. While digital should be offered I think customers still want human contact.
- 14. I support the greater use of digital services to make it easier to converse with the



relevant agencies. I do not, however, support the closure of the regional DVLA offices.

- 15. Information available online is very helpful. The idea about vehicle tax disc is quite useful especially in the case of motorcycle as they can be stolen easily and cost additional money to replace. But great care should be taken that relevant information could be found easily. This is probably one of the hardest tasks as due to the share volume sometimes it is difficult to get to the relevant information that one is looking for.
- 16. It will make it quicker and convenient
- 17. Keep my own address details up to date on DVLA.
  - VED on EVL is excellent don't mess it up.
  - Deliver monthly payment option by direct debit for VED (like TV Licence). With e-VED, e-insurance data and e-MOT data do away with any paperwork, including that which the Post Office still insist you produce when you have to go there.
- 18. Make things easier. More digital, remote access and less paper please!
- 19. Maybe
- 20. no (x6)
- 21. no I want to deal with people face to face or over the phone not online.
- 22. No it will make it more difficult as I am not a fan of the internet and the so called safety of it.
- 23. No, because your website is difficult to navigate and you can't find what you are looking for.
- 24. No, I currently do not have regular access to the internet and when I do use any on line government website I tend to find there are always issues, such as freezing pages, time outs items not saved. Once these have happened it is overly hard to speak to some one to get them sorted out.
- 25. No, internet access is not always possible for a variety of reasons.
  - Ticking boxes does not always provide a comprehensive solution and creates a takeit-or-leave-it attitude by the originators of the formulas.
  - Similar issues with other digital methods.
  - Security of services is paramount.
  - Essential to expand High Street services, beginning with more provided by local Post Offices.
- 26. No. the online services are not user friendly and do not work. I much prefer dealing with organisations by phone.
- 27. No. This will create the frustrating culture of not actually being able to speak to anyone in person, but answer a lot of questions which generally are not relevant to your needs. This causes undue stress because people don't have time to listen to long voice activated messages.
- 28. No. Transacting with DVLA for on-line re-licensing is already a proven and effective service. Having recently dealt with a DVLA Local Office for a personal number plate I believe the decision to close these offices is the wrong one and would strongly question the business case and motives for doing so. The existing process was smooth and efficient. The on-line driving licence renewal process is poor, so the department should concentrate on getting existing services working properly before considering moving other services on-line. Delivering on-line services are historically significantly more costly than estimated and should be considered carefully against existing services and VFM.
- 29. Not all it will be more complicated
- 30. Not everyone wants to do or is able to do things digitally. Non-digital services need to be retained and in a way that works effectively.
- 31. not in the slightest
- 32. Not really
- 33. Not really, you think this as a business and not as a mean to improve the amount of vehicles on the road.



WE are on a finite planet, country, city and there is nothing that anyone can do about that.

Making it easier to obtain something does not mean MAKING a good driver/rider/pedestrian.

- 34. Not really. Most of my dealings are with DSA who, in my opinion, are leading the way with digital services already. The vision is very much orientated towards the DVLA which indicates very clearly to me that they are playing catch-up. By being a front runner, there's not a lot else DSA can do in this field, but their achievements are not acknowledged here. This serious omission could leave a less well informed person with a heavily biased view. Whether intentional or not, that's how this document reads.
- 35. On line services are undoubtedly the way forwards. However, we must be careful not to throw the baby out with the bathwater. Some advantages are received from "face to face" encounters. Additionally, full high speed internet access must be available across the whole of the country.
- 36. Online services is better however not for all members of public. I have many friends and family who have no internet access. Also even in circumstances where people get internet access being able to discuss problems/difficulties or even obtaining straight forward guidance from a human is far more customer friendly than 'seeking advice on-line or an automated telephone service'. Public get annoyed with these type of services and automated phone lines. There should be more 'human' staff employed to take calls and more so that phone numbers are included on letters. I get annoyed when dealing with banks/government agencies where no phone number is included and to save money are just encouraged to 'go on-line'. This option does not always work.

I have concerns about HGV, Bus and coach testing also - if this now means that it would not all be government run to me this will increase fraudulent MOT passes'. At least if government run (by VOSA) you know they are experienced and unlikely to do any fraudulent passes' as this does currently occur for private vehicles (cars) as most private garages can perform these tests.

It makes more sense as generally HGV's do far more travelling for work purposes and more important they are road worthy.

With regards to looking at a way to defining organisations (combine call centres etc) the problem with this is that staff have to know more (yes/no guidance on PC's to staff does not always work) and therefore the customer enquiry cannot always be handled as effectively.

Staff taking calls would be expected to handle calls on Driving topics, vehicle topics and know everything there is to know about driving tests, taxing, and vehicle testing. Realistically it would not save money as it would generate more complaints as the relevant information would not be given.

- 37. Only if they actually work, For me in the past these services have failed drastically. An example was trying to apply for a new birth certificate to provide it to the DVLA. The information was simply not recognized.
- 38. Possible but there is still a need for the hands on approach, or government becomes another faceless entity just like the banking sector
- Possibly but I have concerns that it will be harder for people without internet access or learning difficulties or with an issue that cannot be simply resolved by answering preset questions
- 40. Possibly, depends on how robust and secure the online delivery process is
- 41. Possibly, however when dealing with a series of questions regarding a driving licence application that required a referral to DVLA Medical section call centre staff were unable to provide adequate answers.
- 42. Probably
- 43. Stop sending decent working class people to the dole queue you heartless tory **xxxx** (redacted due to offensive language). Incidentally, it takes about a month between



- signing on the dole and actually getting any payments through because you've laid off so many jobcentre plus staff.
- 44. The current way in which the agencies have different sites needs to be standardised so that users can access services easier. By joining any of these agencies up would cause the web accessibility to be compromised by having large unworkable sites. The way that DSA have created sites seems to work better than the DVLA as things are easier to find.
- 45. The previously excellent idea of having all departmental contacts on GSI has gone, no doubt to cost cutting; so I have to waste time and resource in trying to find and establish contacts in other departments by more lengthy means. Transnet does not work. I do not use Gov.uk as a google search still produces better results. I have a three yr old car and have never succeeded in taxing it on-line and yes I have had insurance. Some parts of the UK do not have access to the internet so you have to realise that it is not the solution to everything. I understand that the department continues to waste money on expensive digital projects that will not deliver what we want.
- 46. There are many in the UK whom have little or no access to these digital services. By other means I assume this is assisted digital services which still means staff are required to assist the customer. If staff are to be retained for this service will this be public or private sector driven. If private will the freedom of information be as readily available as now? And what safeguards are to be built in in relation to any hand over of a public service to for profit organisations. This is not mentioned anywhere in consultation.
- 47. This is the way of the future, however it is obvious that the proposal was put together by someone seconded in from DVLA. There is a lot of bias in the proposal towards DVLA - page 17, para 1 is proof of this. It is actually DSA who have been at the forefront of delivery IT and on-line services in DfT, not DVLA, whose services are much more inferior.
- 48. Very much so
- 49. What do you mean by OTHER DIGITAL MEANS? As an individual, doing transactions on line is not too much of an issue, but consideration needs to be given to my response at four above, i.e. those who may have difficulty accessing or do not have a facility.
- 50. when I currently try to tax my car on-line it all depends upon when the insurance company has notified DVLA of my insurance renewal it has failed in this the last year. My experience of other Government on-line services delivered by HMrevenue and customs is not good. Left hand does not know hat right hand is doing, wrong notifications are sent out, I am accused of non-payment of tax when in fact Government has hold of it and mislaid the payment on another system staff do not know how their own systems work. If you can overcome these obstacles then fine, but I very much doubt it and my experience to date with Government digital service is sheer incompetence and intransigence of staff who insist their is nothing wrong with their systems.
- 51. Yes (x 21)
- 52. Yes a move to digital based services is simply in line with most major organisations.
- 53. Yes I would like to do as much as possible on internet however, I would like to make sure that there is a human being available to help when needed as FAQs are always incomplete and never seem to have the answer to the question I have.
- 54. Yes not being able to renew a photocard driving licence via the internet just because your passport is over 5 yrs old is stupid. Photos could be attached or, considering how many people have laptops (that incorporate a web cam) or smartphones you can use the equipment consumers already have. Checks can be in place at the processing end or upstanding members of the community can 'second' the photo/application by a link being sent to them as the applicant would give those details. the person swearing that the details being supply are true would also then have to give their details such as



- employee number, employer position held etc)
- 55. Yes as that will mean access at any time of the day or year.

  Unfortunately it will also take away the ability to contact a "local" person for assistance
- 56. Yes but this has to be a new digital services approach and not a Durand paste of paper processes
- 57. Yes in a digital age, services that can be accessed online can be easier and more convenient for some. However, lots of people for a variety of reasons are unable to access online and digital media and these have to be considered.
- 58. Yes more document changes and requests would be easier on line at present some require a long distance trip for a five minute paper transaction
- 59. Yes probably but I would still want to be able to talk with someone at times. Contact with an individual can be important and necessary for reassurance.
- 60. Yes providing that any information submitted will be kept secure.
- 61. Yes the online services will be useful providing they are not full of jargon and are aimed at independent instructors like me.
- 62. Yes when booking driving tests.
- 63. Yes will make access easier.
- 64. Yes, absolutely. Abolition of the paper tax disc will save me time and a little money since I can renew at the end of the month and not allow postal time. I can also rely on payment coming in to account by use of email without post. I would also welcome abolition of the paper "MOT" certificate, replaced by an online version.
- 65. Yes, although there must be consideration for those who are unable to understand computers
- 66. Yes, as I will be able to email (preferred option) in my own time. Time to think about what to say and it is in the record
- 67. Yes, as most things are on-line these days.
- 68. yes, as working full time it is hard to use face to face services even though these are highly valued.
- 69. Yes, however I feel that the move to digital is not appropriate for all services and you still need to provide access to those or either don't have digital access or are unable to do it themselves.
- 70. Yes, I think handling V5, license, MOT & Tax documents online would save money, time and convenience.
- 71. Yes, it will make it easier to access the service/information I require.
- 72. Yes, it will make life easier.
- 73. Yes, most definitely
- 74. yes, providing the forms are as simple as possible and have no ambiguous questions
- 75. Yes, simplified forms
- 76. Yes, the availability of mobile data requires digital by default services from Government bodies.
- 77. Yes. I fully support maximising the use of online services.
- 78. You need to keep in mind that some people and some religious groups cannot or are not able to use digital services and you must make provision for those groups not to be discriminated against, if the services of any of the agencies under consultation were to be purely on line only.



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

- Absorb it into one of the other Agencies seems silly to have an agency of just 200 staff. You would probably save a fortune on estates, enquiries, support structures, etc.
- 2. Do not outsource any services. The rail and power companies are prime examples of what happens when public services are outsourced to the private sector.
- 3. I am not involved with the Vehicle Certification Agency, so I will leave that for those who are
- I believe that it is important to focus on the needs of the customer and I would be sceptical as to whether change is solely being introduced purely as a measure to save money
- 5. I believe the VCA would be a prime candidate to operate as a fully commercial organisation, selling it's expertise alongside other providers. In my opinion the privatisation of this agency would be a beneficial option.
- 6. I do not think that the consultation document makes it clear enough about what you are intending on doing.
  - Obviously growth in wider economy is always good however I feel a better explanation about suggested proposals should have been included.
- 7. I don't have a clear idea of what the VCA actually does
- 8. I think the ability (as a driver) to update or request documents online would be a great asset. A reminder service for MOT's, just like tax would be great. Maybe via letter or to save money email or text would be great.
- If VCA are to become an independent source of approvalers they could expand as other international companies have and move into approval areas other than automotive.
  - The government should also consider adopting the EU proposal of approved modifications to vehicles (as per Germany already do, for example). This then would be monitored during registration and periodic technical inspection.
- 10. It is imperative that confidence and integrity us upheld throughout the testing agencies. It has been proven that handing these responsibilities over to the private sector is wide open to fraud and underhand dealings. In my view if this happens it would be a large step backwards, so much so that when realized further down the road when standards have dropped to an embarrassing level, and we are being laughed at by the rest of Europe and the world, hopefully someone will return the testing agencies back over to the civil service....if one is left!
- 11. keep all the offices open
- 12. keep it as a public service
- 13. Keep it as it is. The ministerial statement says it 'provides high quality and trusted service' and that it is 'recognised for its quality and integrity'. So how is it a target for reform, if that is the case?
- 14. Keeping it in house as a none profit making agency is the best way to offer a 'service' to the public in an efficient & cost effective manner. Adding a profit margin to the list of requirements has yet to provide any benefit to the customer, just look at the privatised bus 'service' or our efficient rail network!
- 15. Making sure foreign drivers are competent to drive on our roads and aware of cyclists and pedestrians as we drive on the right
- 16. Merge this with VOSA to provide a part holistic service around vehicles
- 17. n/a (x2)
- 18. No (x16)
- 19. No as I don't use any of their services at present.



- 20. No I don't use VCA
- 21. no. do not have enough experience of use to be able to comment
- 22. None (x3)
- 23. None at this stage
- 24. Not at this stage
- 25. Not informed enough to comment. Seems a bit of a minefield!
- 26. Privatisation does not work instead it ends up costing the taxpayer, when the private service provider suddenly finds out it is not as lucrative as they first thought and gives the service back to Government to run. Alternatively, it works but still ends up costing the taxpayer as private companies then up the cost of the services way above inflation no wins for the public as the Government continues to hive off our services.
- 27. reduce the red tape, make the whole process transparent, and apply in a manner that catches real criminal activities rather than demonising otherwise honest drivers/customers
- 28. The VCA and the vehicle side of the DVLA should be merged to 1 contact point for anything to do with vehicles.
- 29. There is too little information in the consultation document to allow the reader to offer an informed response about whether the high-level proposals will help the UK economy. The choice of language suggests decisions are well on their way to being made.
- 30. There's not enough information in the consultation paper to make informed comments on this.
- 31. This could be joined with one of the other agencies and the obvious one from my perspective would be VOSA as this is a closer fit than any of the others. As both of these are not supported by the tax payer this would help as I believe VOSA have been running at a loss for a few years.
- 32. VCA should become the "single" agency dealing with approvals, particularly vehicles. Use of existing facilities, MOT scheme could be encouraged to help deliver the service closer to the customer.
- 33. VCA should remain in public ownership and as such impartial to market pressures that apply in private sector. Market pressures will drive down standards in the interest of shareholders premiums whilst jeopardising the safety of the vehicle using public

#### 34 VCA

The Agencies have generally been much better run than the Department centre and this is evidenced by better achievement of targets/objectives, better financial control, better people management and much better customer satisfaction (even from those who get a negative output (eg a fail) from the Agency. (The exception may be VOSA which seems to have been poorly managed in lax financial management, overstaffing and antiquated processes). So it does seem rather perverse that the Agencies are increasingly managed from a less efficient centre which seeks to be high on leadership but doesn't know what management is.

The idea of One Department is ludicrous if it seeks to include Agencies. The Motoring Services Agencies have nothing in common with the rest of the Department; without a common goal a team cannot function properly. So it should be accepted that we are not a team but a collection of service delivery organisations gathered together in a collegiate way allowing for working together when it makes sense but separately in most things.

The implication of the Consultation is that VCA will be privatised/mutualised/joint venture. That is not necessary. Greater efficiency and benefit to the public purse would be achieved by simply changing the relationship with VCA and giving them the same freedom within DfT as, say, Office for Rail Regulation or British Transport Police.

- 35. will probably privatise easy pickings if profits for the usual suspects
- 36. yes, get a proper socialist government in (not the xxxx (redacted) who have the



cheek to call themselves 'The Labour Party'). Then send all the current tory politicians to prison. I hope you all get repeatedly raped up the **xxxx (redacted)** you posh **xxxx (redacted)**.

- 37. Yes. It should be the sole authority for vehicles entering service in GB, prior to registration. So Type Approval, Individual Vehicle Approval, Motorcycle Single Vehicle Approval, COIF, ADR, TIR, ATP etc should all come under the remit of one Agency responsible for vehicles entering service.
- 38. You could try delivering documents in the time period need'd before having to notify DVLA of your documents going AWOL. Mine were at least 1 month late and very close to me NOT having them in time to tax my vehicle. They took 2 months.
- 39. You should leave it as a Government run organisation. I have seen how privatisation ends up costing the taxpayer millions with the failed efforts to outsource fire services and rail franchises in both instances the private companies awarded contracts to run/provide these services handed them back to Government as they ran out of money and effectively bankrupted themselves. So once the services were outsourced, the private companies were paid to deliver them and then handed them back and the Government ended up paying again. This has actually happened several times with rail when will Government actually accept it is not a success and the taxpayer is sick of picking up the bill for Government incompetence.
- 40. YOUR Services is irrelevant vs the bad driving I see very day, I was a London bus driver until recent.



#### 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?

 I fear the introduction of private enterprise in the conduct of the driving test would be a stepping stone for government to offload it entirely to the private sector. Where "delegated examiners" are employed by private lorry and bus companies their pass rates are significantly higher than those of DSA examiners, leading to speculation that test routes and test criteria are manipulated to provide the requisite number of LGV/PCV driver passes at any given time.

Calling the test candidate a 'customer' makes them sound more like a business opportunity rather than someone wishing to gain a qualification, indeed the public perception may well see private sector involvement as a nice little earner by unsuccessful candidates, Halfords could well see a significant rise in shoplifting to make good their losses.

Corruption is an unsavoury facet in all walks of life, not least in politics, this is diligently and successfully dealt with internally within the DSA, private enterprise would surely offer more scope for malpractice and would require an additional external body to monitor it, In the USA this has proved to be a financial disaster, costing far more than leaving public services in place. The driving test is a "Service To The Public"and should remain just that, not only for the candidate but for the public as a whole in the general interest of road safety which affects each and every one of us.

The overwhelming majority of driving examiners are people who feel they make a positive contribution to road safety, private enterprise pressure for profit would diminish and surely trivialise the job.

Private sector involvement was wisely in the end rejected by the previous conservative administration some 20 years ago. It was a wise decision then it is a wise decision today.

#### xxxx (personal details redacted)

all of the above is a personal view, I do not speak for the DSA

- 2. I thought I might suggest a revision on winter test times. I understand the DSA have no control over weather conditions. But wouldn't it save the DSA an awful lot of time and effort to scrap 8:20 tests in winter, as lets face it, frost is almost always present and it seems a complete waste of time and money paying examiners to turn up everyday for a slot that is often cancelled, I'm sure it frustrates them getting up for no reason. It would also reduce the anxiety pupils have to face by repeating the whole process of turning up again. Maybe having a later slot would be good or even extra Saturday slots throughout winter? Most ADI's I speak to tend to agree
- 3. As a customer I don't have far to travel. Cheaper and more convenient
- 4. As a customer I would be happy for non-civil servants to under take the testing akin to MOTs as long as I knew the public sector was assuring the accuracy and independence of testers.
- 5. As a customer it will be convenient to have a test facility closer. I have recently passed by car driving test and encounter the following problems with test booking procedure.
  - The waiting time to book a test is too long in most test centres. So if someone fails the test they cannot book another test for about a month or so and have to rely on cancellations. I suggest that each individual should be allowed to have multiple (may be two) bookings with a gap of



10/14 days so if they pass the test in first attempt they can cancel the other booking. I think it will be helpful.

- When I tried to use the DVLA website for booking my driving test with a disability (bad back) my condition was listed on the website but I could not get any test date in Slough, Uxbridge Hayes and Isleworth test centre. I am not sure if this information exist at a different website but it would be nice to have a link about this on the test booking site so that people with some form of disability would be able to know exactly about the choices of test centre available to them.
- 6. As a taxpayer, I believe that this will be better use of spending whilst bringing a better service to the user; which may be myself in the future.
- 7. As an examiner, I'm not sure how this will affect me as yet
- 8. As long as the driving test is delivered in a fair conformed manner by an impartial non profit making organisation then the sites used to conduct tests from should be widely available
- 9. At the moment knowing where test centres are makes them easy to find, I couldn't think of anything worse than wandering around a trading estate with a nervous child trying to find an examiner. I also believe our road safety is getting worse, the government should be tightening up the test instead of looking to off load it to a private company where profit will dominate all.
- 10. Bringing the driving test closer.

At a time when everyone else is consolidating estate and reaping the economies of large scale the idea that DSA should add to its already extensive 400+ service delivery points is clearly wrong. When we consider that the purpose of the test is to see that someone is fit to drive anywhere in the country for the rest of their lives, the idea that they should only have to drive to their nearest shopping centre is a joke. It is seriously to be hoped that this is quietly put back in its box before the media and public find out how much time and money has been spent in flying in the face of evidence based policy. The distance criteria should be reviewed, centres checked against that and then resume normal business of ensuring that those who are not yet able to display safe driving are not given a licence.

Any discussion of taking the motorcycle manoeuvres in module 1 onto the road must be squashed – again before the media and public either split their sides laughing or demand resignations for incompetence over the costs of researching into something so patently impossible and probably illegal.

As with VCA, the best thing for DSA which gives good customer service, high customer satisfaction, tight cost control and even makes a profit, is to tell the Department to get out of the way and stop burdening the bureaucracy of a central department on a nimble service delivery organisation. That must NOT mean privatisation, mutualisation or joint venture. That has been looked at several times before and it goes counter to road safety, reduces standards and increases costs. It would be as well to abandon the test and sell licences on ebaY. The current model works and is regarded with envy throughout the world – DO NOT BREAK IT.

- 11. By bringing the test closer to the customer would help people requiring to take a test, the issues are around where would these be delivered from and what cost would the technology be. Currently test centres have PCs in them but being mobile would have issues with the access to 3g and wi-fi in the country. This would still need to be carried out by government. There would be an issue with using private companies as they would be able to be pass all of their own candidates and not be impartial. The government would be open to critism as this would not be an impartial service as it is currently.
- 12. Delivering driving tests from places such as Halfords might affect me if I wanted to go



to Halfords and I couldn't park, or if there were many driving instructors practising parking with their pupils. But I guess this already happens to some extent. I'm generally supportive of the plans to deliver the driving test in other locations that are more convenient for customers, as long as the integrity of the test is not affected. It can't be an option for every location in GB.

- 13. Do not outsource any services. The rail and power companies are prime examples of what happens when public services are outsourced to the private sector. Additionally, outsourcing to the private sector will open more opportunity for fraudulent activities.
- 14. greater local choice of test centre plus reduction in waiting time for practical tests. Also a little known aspect of the present system where test centres are randomly located as in my area leading to massive overcrowding of learner drivers in the area surrounding the test centre and subsequent friction with the local community.
- 15. Have you considered the safety aspect of more inexperienced drivers using the area around Mothercare, ELC, McDonalds, etc etc, on industrial estates where Halfords are located?
  - i.e. Bedford. The Halfords store is not ideally located to encourage learner drivers to negotiate the narrow bends etc.
  - Are these industrial estates on privately owned property?
  - Are the 'learners' going to park in Mothercare spaces whilst using Halfords test centres?
  - I wonder if this has really been thought through properly?
- 16. I agree with the strategy but the role of Driving Test Examiner should remain within the public sector.
- 17. I am concerned that there will be issues with private companies have a say in how/ when/ why a driving test is taken etc. Due to the number of cars on the road I feel that all aspects of he driving test should be kept with in strict control of the government to stop the possibility of the integrity of the test being compromised.
- 18. I am happy to go to a test centre to undertake a test, however this is subject to one being local and how is local defined?
- 19. I am really concerned that a more localised service would require private sector involvement' this would clearly lead to a lack of impartiality and integrity from the current system.
- 20. I believe that it is important to maintain the integrity of the test by ensuring that standards are maintained in the interests of road safety. Whilst I can understand why the government are looking into new ways of delivering a test I am not convinced that by working with private industry standards will be maintained and consequently I am of the belief that road safety will be compromised.
- 21. I believe this plays into the hands of those people who teach people to learn to drive in their own back yard. I think there is the potential for the integrity of the driving test to be compromised and it is a high risk venture. The first time there's an accident in a Halfords car par involving a learner driver on test, that facility could be withdrawn. In the current climate there is also the risk of such places going under. This jeopardises customer service provision if this becomes the future for delivery and there are no permanent sites from which to test.
- 22. I do not agree with the use of the private sector to carry out driving tests as this could compromise the integrity of the test itself.
- 23. I do not think that bringing in private organisations will improve things, I believe that the customer will suffer and their best interests will not be put first and instead profit will be made the priority.
- 24. I do not think that using commercially active locations for 'partners' is sound. This implies to most people that it is that organisation delivering the test. That should not be the case. The test should be delivered by central Government to ensure standards are high and consistent. may be mobile testing ie Driving test vans travel to areas and this is the office for the examiner.



- 25. I feel there are data security issues surround this with candidates data and health and safety risks.
- 26. I question whether the integrity of the test can be maintained in the hands of the private sector. I firmly believe that the standard of the test will fall, and eventually the cost to the customer will rise. Private companies in my experience value customer service less than profits and although initially promises will be made and then broken ultimately the British public will suffer from poorer driving standards ie. More dangerous drivers! If private companies are allowed to provide the practical test who will offer quality assurance? The DSA offer all of these services without compromising the integrity of the test or customer service and offer the best value for money for both the customer and the government as the agency is self funding.
- 27. I share this concern for the driving tests as well private examiners were used a few years ago and many were found out to have accepted bribes. I am not saying this doesn't ever happen in the civil service, but being independent many of VOSA's staff have less to gain and more to lose (pension, job etc) and do not take the risk. They are also professional people who joined the job in order to contribute to road safety and are not working for a profit driven organisation
- 28. I support the initiative to provide the test at a greater number of locations but I wholeheartedly disagree with any plans to out-source the work of Driving Examiners.
- 29. I think that carrying out driving test based in Halford's car parks, for example, might be a good idea in terms of increasing the availability of driving tests and reduction waiting times at test centres. However, I remain extremely wary of the idea of sourcing out the function of driving examiners to private organisation outside of the DSA; I think there would be an inevitable drop-off in testing quality. My opinion would be to keep all testing roles within the DSA, keeping private organisations away from this delicate area.
- 30. If the cost of the theory and practical test can be kept down, it will be of great benefit to pupils, however the integrity of the driving tests must be maintained in order to ensure the safety of all road users.
- 31. If the test is maintained by the DSA and not handed over to private companies, then I feel it would work.
  - On the other hand if this means watering down the standard of the test and losing faith and integrity of the delivery of it by privatising it in any way just to save money for the government, then I feel this would be wrong in so many ways.
- 32. I'm fortunate that our test centre is already local. However if I lived or worked in remote locations then the setting up at Business parks is more accessible
- 33. improve business
- 34. In and of itself, it would make no change. However, if the plan is to close DSA stations, then it would increase unemployment, which would be bad for businesses generally.
- 35. Irrelevant question!!
- 36. Is it really that inconvenient to expect a driver to attend a test centre run by government as opposed to Halfords who do not open their doors until 9am!!! I can understand this if a convenient location cannot be found, but high streets and towns are riddled with empty buildings as the economy suffers.
- 37. It could give some driving test candidates an easier or harder test depending on the location and roads / traffic around that location.
  - However it can be helpful to those who live a good distance from a test centre. But like everything it is open to abuse by the minority who just want to get a licence. EG John Smith lives 5 miles away from his local test centre but has failed his test 3 times.
  - He decides to travel 25 miles to a test centre operating from a leisure centre as the roads and traffic are not as demanding as his local test centre and therefore can pass his test but still needs to drive on the roads near his local test centre where he has repeatedly failed.
- 38. It doesn't



- 39. It is not possible support this policy with the level of detail currently available. The policy of taking testing to the customer does not appear to be evidence-based; the consultation is silent on the driver for this policy. While there could undoubtedly be savings realised from a reduced- or even zero-estate test delivery model, taking testing to the customer is not without cost particularly carbon emissions by having peripatetic examiners.
  - There are also other issues to consider, such as data security when operating out of third parties' premises or when driving examiners are carrying around the provisional licences of successful candidates who have chosen the automatic licence issue option. DfT must ensure that whatever action it takes it does not compromise the integrity of the test itself. There are probably opportunities to rationalise back office support functions and the operational field structure needs to be modernised. But these need much greater exploration and consideration than given in this document.
- 40. It may lead to more cancellations ie if tests are conducted from multi-use car parks (ie Halfords) it may be difficult to get into or out of car park at busy periods, so leading to later tests being cancelled
- 41. It really is all relative I am close enough to two major testing centres so this does not directly affect my customers or my business, but where it does, as outlined above in question 8, it makes a big difference according to the feed back. It should be remembered, however, facilities for comfort breaks need to be a part of this provision both for examiner and pupils alike, especially the latter as they will be very nervous and may need a last minute comfort break. Driving with a full bladder is not conducive to good road safety as they will be bothered by that and not concentrating on the driving.
- 42. it should make it easier
- 43. It will make it easier for me to get to test centre close to where I live, rather than driving for 20 miles to get to do my adi part 3 test.
- 44. It will make it easier to schedule and take my exams.
- 45. It will make my pupils feel more at home at the thought of doing a driving test, and not make them feel they are in a them and us situation.
- 46. It won't. As a personal customer (rather than business) I took my test 3 times. I don't feel I need to be 'babied' or coddled by having the test brought to my back yard. I feel like a valued customer when I trust the services the UK needs to be impartial are impartial and non-profit making. I travelled to the test centre fro my test and found it a professional place to start from. I suppose if I went to have a test on a weekly basis it would be more convenient for the test centre to be closer.
- 47. it would be a complete waste of money and resources, driving test centres are already located locally, having more test centres in local areas would also reduce the effectiveness of the driving tests by allowing more learners to sit the test on a preplanned, local route.
- 48. It would be cheaper for me to have lessons in my area as I could save on time travelled to the test areas.
- 49. It would depend on whether driving test appointments were held more locally.
- 50. It would ensure my documentation is update and complaint to the law. This in a small way will help ensure car's suitable to be driven on road (i.e mot).
- 51. It would not make a great difference to me.
- 52. It would put us back to the position of having more test centres available as we were before the MPTC implementation, especially if it was to be done for motorcycles as well just the cars
- 53. Less helpful having defined test centre's where everyone knows are much more sensible than an ad-hoc approach
- 54. Less travelling
- 55. less travelling costs and having to learn a new test area.



- 56. Mainly not being able to travel by normal means for things like a Theory test puts an unneeded extra financial strain on a particularly already expensive procedure, For a new driver, they need the theory test, the test, the lessons, the bike/car, the insurance and it is ridiculous in expense.
  - On the Actual test it is also best to be confident in the area you know. Having to go to some strange town / city your unfamiliar with is very unfair to those not from that area. As such I think you should provide a mobile testing service.
- 57. Make it easier to undertake, less stress from within the company and individual lives allowing time and resources for other things.
- 58. make things less safe
- 59. May make it easier for customers to access the driving test.
- 60. More choice
  - Reduce waiting times
- 61. Most customers have a test centre close to them already. How does putting examiners out on retail parks benefit customers? Test centres have specific customer waiting rooms and facilities for staff that places like Halfords do not have. That's not an improvement for customers. Also, is it not dangerous to have learner drivers driving around retail parks that are busy with shoppers, often with small children, not paying attention to vehicles? This is not about improving the customer experience it's about off-loading the driving test to private companies. This shows how little interest the government has in road safety.
- 62. N/A (x5)
- 63. None (x2)
- 64. Not applicable but a test from a university or school would have been great
- 65. Not at all, apart from, I understand that taking testing to the customer is much more expensive than a person attending a driving test at a Government test centre and so as a tax payer I will probably have to supplement this cost. Please se my response given above I am against privatisation as it always ends up costing the taxpayer. Senior officials seeking to make changes should consider the real benefits to the taxpayer and not just about covering their own jobs and justifying their positions.
- 66. Not directly (I have a driving licence of 45 years standing) but any streamlining is bound to help.
- 67. Not personally
- 68. Not so much me now. But a variety of options to choose from when undergoing my motorcycle direct access driving test would have been useful. Notwithstanding that your policies on motorcycle riding tests are a shambles I'm sure it can only improve.
- 69. Nothing should effect the integrity of the test, allowing private business to take over the test will have a detrimental effect on the test as it will be driven by profit and not road safety.
- 70. On a small scale I think this would be useful to the customer in rural locations, but if expanded, would heighten the risk of safety to examiners. They may be spread thinly over many locations and wouldn't have the contact with other examiners, where they discuss anomalies which may have arisen, traffic road closures or congestion and support to each other with the challenging and aggressive customers.
- 71. Please do not give into ADI's and the big names in the industry . Preserve the integrity of the test and do not privatise the government departments . This would be an unmitigated disaster to ROAD SAFTEY
- 72. Providing current safeguards in place are kept. Therefore meaning that someone must have to pass same test standards prior to being given licence. No risk to fraud.
- 73. Reduction in travel time and cost, more flexible options for accessing the service will all help to reduce individual and organisational costs.
- 74. Test centre locations are good and facilities at Multi purpose centres are very good unlike say a Halfords store
- 75. The very fabric of the driving test is at risk when you start allowing private bodies to conduct the practical test it opens the door even wider for abuse and fraud, especially



in our current climate of terror. Even recently their are worse drivers on the road now than when I first started to drive, this is backed up by the increase in accidents on our roads. alarm bells should be ringing in our so called leaders' brains.

- 76. The agency should be working towards safer driving not potentially cutting corners and standards to save money.
- 77. The driving test is already taken closer to the customer at outstations. These are satellite stations to a main centre and staffed from the main centre.

  These sites offer in the main facilities for both staff and customers for there use. Sites such as Halfords offer at best the most basic of health and safety standards. There have been instances of fire escape doors being secondary locked at these sites. There are no rest or toilet facilities for the test candidate. Locations are generally unsuitable for the provision of a driving test.

  No mention has been made in any document in relation to this method of test delivery.
  - No mention has been made in any document in relation to this method of test delivery what would happen should the host demand payment in the future.
- 78. The overall idea of making the driving test more widely available to the customer is no doubt a good thing. However, many considerations need to be taken into account. Location is very important, it has already shown by moving to certain locations the integrity of the test is already being affected due to that location. Spending 5 mins at the start and end of the test on quiet country roads does not test the candidate the same as leaving directly into urban traffic. Also the facilities provided at some locations is not the same standard throughout for the customer.
- 79. The plans to move the driving test closer will aid young people in the factor of picking up from colleges, and many other people will benefit from being relaxed in an environment they will know and ultimately could perform better.
- 80. The use of car parks in supermarkets etc will lead to complaints from the public. There is already a problem with some supermarkets when it comes to practicing bay parking, if the tests are conducted from these sites there will be traffic jams and the retailers will soon get sick of complaints.
- 81. There is no guarantee that the testing sites will be of any use, and with companies going bankrupt at the tip oh a hat these testing sites may become unavailable overnight.
- 82. They will affect my children and not me
- 83. they wont affect me I passed my test years ago
- 84. Time saved and more convenient
- 85. unsuitable locations give difficulty parking etc
- 86. What's wrong with the existing practice of using a test centre?
- 87. Whilst I believe it is a good idea to offer tests from a variety of locations to enable candidates more freedom of choice in the geographical area their test is delivered, to consider any form of privatisation of the driving test is a patently preposterous idea. Test integrity would be completely lost as private operations would simply pass or fail candidates according to their market share and profitability. Not being bound by FOI, this would be virtually impossible to prevent. Candidates would simply use the provider with the highest pass rate, which would do nothing at all for road safety in the long term. Although private service providers have delivered the theory test, this is a very different animal to the practical test. Answering a theoretical question clearly leads to only two possible results right or wrong. That is not the case with the practical test where many other factors are taken into account. I do not believe that any private delivery of the practical test would work as well as the current service provided by the DSA.
- 88. Why the xxxx (redacted) do you need to "bring the driving test closer to the customer"? The customer drives to the test in a car you xxxx (redacted), therefore it's really a moot point how far away it is. Which xxxx (redacted) came up with that one?
- 89. Will make no difference as an individual.
- 90. will probably privatise easy pickings if profits for the usual suspects



- 91. wouldn't as I have already passed my test. But I'm sure it will be of benefit to others
- 92. You already do this under certain circumstances but again privatisation will never deliver a cost saving to the public.



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

- 1. "Authorising others to carry out testing on our behalf in certain circumstances". This will effect the integrity of the test significantly. HGV and Bus tests conducted at private sites, with pressure from their own management to "Get people through" is a recipe for disaster. Police, Fire, MOD and Bus companies are already testing their friends and work colleagues. Government examiners would not put themselves in such a compromising position, so why is it acceptable for other testers to do it.
  - A government run testing facility is neutral and should remain an independent location and not part of a private business.
- 2. A concern is that a large operator could apply commercial pressure to influence the "Pass Rate"
- 3. Again I say, it is not about the red tape or the way you conduct your so called business but rather what road users do afterwards. And you seem not to get it!!! or oblivious to it.
- 4. allowing the private sector to conduct testing will compromise the integrity of the testing, the private sector is far more open to corruption.
- 5. Although I support the continuing move to privatise the HGV/PSV testing and I see how it will provide greater convenience for the customers and businesses, I do have reservations on the standards applied and therefore road safety. I support this with the evidence of what really happens with the private car testing scheme, rather than the official statistical view. Given the evidence too from the scheme in Eire (run by private garages) then if such a scheme became reality in the UK, close policing and perhaps limiting of numbers of approved centres may be beneficial to continuing road safety.
- 6. As a recently ex VOSA employee, current motor trade employee and a road user, I have concerns about the suggestion that we work too closely with the private sector in regards to conducting HGV/PSV testing itself. VOSA administer the car MOT scheme and every week receive and have to act upon more information regarding dishonest MOTs being issued. The private run Driver CPC training courses are already corrupt, where many people are paying to say they have attended courses when they have not. This is because profit and enforcing standards do not mix well in private industry the sales department are always separate from the quality department and there is very good reason for this. Dealerships are paid very hefty bonuses based on their pass rates, and so are likely to pass their own fleet in order to get the money (or be instructed to do so by their own management).

VOSA's own examiners are quality checked at least once a month by independent staff with nothing to lose by telling the truth if issues are found VOSA's HGV/PSV testing division have been 'threatened' with privatisation on a number of occasions over the past 30 years (the latest review was only a matter of months ago) and yet it has never happened, I can't help but feel that there is a reason for this. VOSA are already using private premises and will shut the majority of their test stations, moving testing closer to the customer that is enough I think.

VOSĀ are working towards new terms and conditions for staff via Next Generation Testing so their own staff will be more flexible and able to meet the demands of private industry. I would point out that when actually offered 24 hour testing, not one ATF actually went forward with it despite saying that they would. My biggest concern though is that nowhere in your consultation document does it refer to KSI figures, or that these are being considered when making your decision. My payslip said 'VOSA — saving lives, making roads safer' and that is what VOSA do, and do well



- 7. As long as the actual testing continues to be done by actual Vehicle Examiners then the initiative makes a lot of sense.
- 8. Availability of tests must be maintained at the present level, and scaled up to meet predicted future demand
- 9. By testing at AFT's the transport costs will rise as they already have done which in turn will and is being passed on to the end consumer who are facing increasing prices, this must have an impact on inflation.
  If third party testing is done by outside Government channels how can you guarantee standards, when profit speaks louder that safety, just look at the railways, a bit different when you have a 44 tonne truck on the motorway!
  Testing needs to be done by an unbiased agency to a continuing standard that can be measured and checked...just like VOSA
- 10. 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. 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.
- Compared to using VOSA, using customers to own testing stations increase jobs and also flexibility with HGV drivers, which in turn could help the economy significantly.
- 12. Dear Sirs, I wish to comment on your strategy to reduce the number of MOT testing stations for HGV's.

I write as a committee member of the Amusement & Catering Equipment Society.

Our members tend to specialist and often slower vehicles and many are now encountering what we consider very unreasonable journey length to the nearest station. Although strictly speaking members vehicles do not require testing we find it hard to encourage it when extra burden is being encountered like this. One now needs nearly a whole days travelling to and from to get to his nearest testing station.

May I also point out that in theory, at its test point in time, a vehicle is more likely to be un-roadworthy and so increasing travelling distances to a (sometimes) hundreds of miles round trip seems to be illogical and dangerous for all road uses.

Yours faithfully,

#### xxxx (personal details redacted)

Amusement & Catering Equipment Society.

- do not have much experience of this element and you may already cater for this, but would like to see more advice and education about safety factors so people would not feel under pressure about the testing, find when people are really stressed they tend to ignore or cover up an issue rather than present themselves for testing
- 14. Giving a service that customers want is the crux of this whole issue. They want tests at times of day and on days of the week that suits them and not necessarily that suits the provider, as quite often is the case with car tests
- 15. HGV bus and coach testing is being delivered excellently by the DSA. It has been modernised over the years to take in better braking systems and updated gears and is delivered with high integrity as is the car test. It is the envy of most other countries. Please don't weaken this in any way.
- 16. how can some who has never driven an lgv with a manual box be given a manual license



- I cant see how involving more partners will help deliver a uniform standard and service
- 18. I do not support the change of testing away from VOSA premises. Putting out to commercial premises may mean that vehicles are 'allowed' to pass tests when they may have failed in a VOSA testing centre.
- 19. I doubt there will be any change at all, apart from the likely effect of putting road safety in jeopardy as delegated examiners have been shown to have lower standards than DSA examiners there have also been some rather large fraud cases involving delegated examiners. From someone who travels daily on public transport drivers do need more training, not PR exercises to hike off services. South London outsourced the fire service provision the provider then went bankrupt and gave it back to Government privatisations does not work.
- 20. I have yet to meet anyone who finds the current practice of closing VOSA test stations in favour of ATF's. Increased pressure will be out on inspectors of vehicles to pass vehicles by the ATF owners. Operators of vehicles will struggle to find locations close to them in the short term and will need to book a test up to a year ahead. The ATF's will squeeze smaller operators out to further away stations increasing their costs and will turn away operators who do not have their maintenance performed by them.
- 21. I strongly feel the tests should stay within the DSA as an impartial non profit making organisation
- 22. If the testing is linked to private partnerships there surely has to be doubts over the integrity of the test?
- 23. In the reforms it states that it will cost customers less to have tests at ATFs but after the all the extra costs that are taken by the ATF it costs almost 50% more. Also by shutting testing stations operators are finding it very difficult to get a test at all and if they do they can be waiting for months which in the present climate is damaging to business. It is also costing business's by having to travel further for tests which is contrary to what the reform is suggesting.
- 24. It seems like yet another inherently flawed xxxx (redacted) of a scheme, undoubtedly drawn up by a committee of over-privileged xxxx (redacted) lording it up in an ivory tower. How exactly does it save a training school money when they have to pay thousands of pounds to develop their site for testing and then continue to pay DSA the same amount for each test? What a load of xxxx (redacted).
- 25. Less red tape and more convenience but it may result in greater risk to fraud this comment relates to both HGV and driving tests.
- 26. Less red tape, less safe, but more profit.
- Look for more locations ie in partnership with trainers but let DSA have overall control of the quality of the test
- 28. More details required really about how you plan to deliver testing and assurance about standardisation across the board.
- 29. More use of private sector sites is fine. The impetus though is on transferring the conduct of the test away from Civil Servants to private sector inspectors. In principle I have no objection but there has to a rigorous quality assurance and disciplinary system in place to ensure fairness and consistency for operators not only testing their own vehicles, but where they will test those of their competitors.
- 30. Much needed and this will provide a better service
- 31. Must be more frequent checking of vehicles on the road by police and agencies and a higher visible presence by authorities to deter transgressors.
- 32. n/a (x2)
- 33. no (x9)
- 34. no sorry
- 35. None (x5)



- 36. None, other than an observation that this is already happening. Why consult on it now?
- 37. not applicable to me.
- 38. Not at this stage
- 39. Outsourcing driver testing will lead to massive fraud
- 40. Outsourcing to the private sector will open more opportunity for customers but also for fraudulent activities. All processes will most likely remain but with different providers, so cannot see how it will cut red tape.
- 41. Privatisation will end up costing the taxpayer as service delivery fails. We are already aware of good amounts of fraud in the delivery of bus driving tests in London How can the Government look to removing driving tests delivered in other languages and cite fraud as one of the reasons and then hand over test delivery hook line and sinker to an industry that has a proven record of lower standards of testing and fraud?
- 42. Ridiculous. Do you seriously want to outsource important road safety testing to private businesses, so that Eddie Stobart can test their own lorries and say that they are safe (whether that's true or not) or National Express can do the same with their coaches? Even if people aren't testing their own vehicles, introducing competition into this process will lead to people going to the company that applies the test in such a way as to guarantee the highest number of passes, regardless of the safety of the vehicle. The virtue of having the government agency (VOSA) carrying out the test is that the person or organization doing so does not have a financial incentive to pass faulty or unsafe vehicles. Hiving this off to the private sector will decrease road safety and increase the transfer of public money to private businesses who will no doubt do their best to avoid paying tax on the profits.
- 43. Road Safety has to be of paramount importance and should not include the opportunity for commercial organisations to make money from it. We have seen the detrimental effects of the introduction of commerce into other public delivered services sufficient to cause me to believe this is not a good idea. I suggest Road Safety through testing should be maintained by a publicly accountable not for profit Government run organisation at an arms length from commercial organisations.
- 44. Some concern regarding maintaining standards. Increasing third party control may mean variation in service and standards which may impact road safety where HGV is concerned.
- 45. The issue I see is keeping an impartial testing. By using private firms it could cause things to be done that do not meet the current standard of an impartial agency carrying out the work. If this work is carried out by private companies how would the paperwork be carried out as it would cost more to send it, and have more expensive IT systems as you would need to link all of these businesses up.
- 46. The bus and lorry drivers are already worse than the 80's or 70's this whole new training objective has not worked.
- 47. The Car MOT model should be scalable to deliver for HGVs
- 48. The changes are not really that detailed so I can't really comment. Most important for me is to know that none of the changes are going to affect road safety in any way. If you can ensure that, then the logistics of how you manage it are not really of interest as they don't affect me in anyway. If, however, for the sake of expediency or efficiency you would impact road safety or quality of testing in any way then I would definitely object to those changes.
- 49. The number of government testing stations should be maintained.
- 50. The outsourcing of LGv testing in Ireland was a hopeless change. DO NOT effect the safety of the public, road safety should be at the heart of all decisions and NOT PROFIT.
- 51. The plans to involve private business in public services appear to be deeply flawed.



DSA's own research into delegated examiners proves that these private companies examiners have a higher pass rate and a higher at fault collision rate of those passed by these delegated examiners than DSA publically employed examiners. Extending this to all aspects of testing (Vehicle and Driver)will inevitably lead to a drastic reduction in perceived and probable safe provision of these services. Market forces will want things done as cheaply as possible to maximise profit, this will drive down standards and will result in ever increasing fatalities on our roads.

- 52. The private MoT scheme is failing to operate correctly so why would anyone consider allowing the commercial scheme to be put in the hands of people who simply want to make money, and are not interested in road safety.
- 53. These proposed changes have the potential to be very dangerous. We as a nation have some of the safest roads because of the legislation that is in place, if these changes are put in place this could change very rapidly.
- 54. This gives those businesses a potential advantage as they will want to test and pass their own employees irrespective of the standard.
- 55. This leaves the whole testing regime open to abuse and favouritism. Tests will be passed when the candidate hasn't reached the standard in order to get the drivers on the road as quickly as possible. Date preferences will be given to candidates who are with the company private candidates will not get a look in. This also leaves the whole system open to skilled people taking test for candidates and could jeopardise road safety. If anything this should be more bought back into DSA and have much tighter control.
- 56. Using delegated examiners does not work and there have already been cases of fraud in this area. You need to keep testing independent to avoid any drop in road safety and the consistency of testing. What would any road user want more 'partners' involved in testing, more use of 'partner' sites or less chance of being killed on the road? You can't have both.
- 57. Vehicle condition is attributable to very few road traffic incidents. The most dangerous vehicle component is the loose nut behind the steering wheel, wherefore privatising the HGV/PSV testing industry (aka the MOT trade) will have no measurable effect on road safety. Natural selection in a deregulated industry driven by profit as opposed to service will eventually negatively impact on the convenience for customers.
  - Who provides the service will have no impact on the customer.
- 58. VOSA at present taking the lead on this with the ATF initiative and have made impressive progress already. The use of independent inspectors "VOSA" must be maintained. Pressure on "in house" personnel may weaken the standards of the HGV/PSV inspection scheme.
- 59. when profit driven service will only get more expensive
- 60. Whilst the idea of operating tests from a variety of locations, including customers own sites is sound, my over-riding concern would be moving to a privately operated examiner workforce. Figures already suggest that the quality of tests delivered by privately employed examiners differs significantly from those conducted by the DSA. Integrity of the test would certainly be eroded as any private operation responsible for testing it's own drivers will clearly have a vested interest in whether they pass or fail. However, offering private involvement in vocational testing alone would certainly be preferable to a full privatisation of the DSA. By keeping the car and motorcycle tests within the DSA, at least everyone would have to pass at least one impartial test at some point in their driving careers
- 61. Will only be helpful for the very large operators, the majority of operators (with one or two vehicles) will be inconvenienced and cots will increase for them
- 62. Without out being familiar with the old I have no comment.



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

- 1. Again, there is too little detail in the consultation to offer an informed opinion. The one proposal that does seem to be clear to rationalise the number of motoring services agencies invites the reader to infer that DfT has already decided that at least one (possibly more) of the motoring services agencies' days are numbered. Bringing together back office functions looks as though it could offer savings, and indeed it might. But if that happens DfT needs to be careful that it does not compromise its stated intention to offer put the customers and businesses at their heart. There is a risk that rationalisation, if too severe or implemented too quickly could cause a 'race to the bottom' in terms of service provision and the standard of service provided.
  - Change will always happen and that is right, particularly in these times of fast-paced technological evolution. But parts of DfT DSA in particular with online driving test bookings have responded well and are close to, if not at, the forefront of digital transformation. DfT needs to take a close look at what the motoring services agencies do well before it makes further detailed proposals about changes for the future.
- 2. Anything that can be done to keep the cost of motoring down in the UK is a bonus, but the integrity of the agencies providing these services must be maintained to the highest possible standard
- 3. By redefining services I am making an assumption that there will be huge job losses. The same volume of work will still be in all the agencies but to be carried out by considerably fewer staff, thus increasing workload and I'm sure not increasing wages. These proposals are ideological in nature and the consequences have not been costed.
  - The wording of the document is aimed at outsourcing/offloading and privatising all these vital services and the methodology outlined in the transformation is no more than an erosion of your staffs moral, terms and conditions with a view to make them a more attractive proposition for private industry.
- 4. By this one makes the assumption that the agencies are re-taken back into the bosom of the DfT. It can't do any worse than has happened since the agencies were separated. It might stop the waste of having buildings sat empty around the country, like the Old Headquarters of the DSA which is costing half a million pounds to sit empty for over four years by the time the contract completes. WHO in their right mind would have a contract where there was no get out clause or would move buildings in the same city with so much time left to run on the current building. WE the customers are paying for this and it is a disgrace!! There are also old Test Centres around the country that the DSA own yet have also sat empty for many years when they could have been sold and that money come into the coffers to hold up any shortfalls
- 5. Call centre staff need better knowledge of obscure parts of the requirements in particular to questions when DVLA medical referral is certain.
- 6. care must be taken not to create a lumbering monster superagency with single point of failure scenarios regularly affecting the customers
- 7. Centralisation to cut costs is often at the price of reduced safety standards and resource i.e. not enough staff to ensure standards are maintained
- 8. Certain functions lend themselves well to the application of shared services. Having one "deployment" team dealing with all DfT staff detachments (Driving and Vehicle Examiners etc) would make sense, as would having one contact centre to deal with all DfTs telephony needs.
- Consolidation of services rarely delivered the saving they proportion to deliver.
   Currently the agencies have clearly defined functions, understood by business and individuals. Blurring of boundaries will inevitably cause a diffused focus of operation leading to a reduce quality of service and specialism. Better to offer high quality



specialism to customers than a diffused service.

10. Defining our organisational boundaries

I don't know what is in mind here.

If it involves drawing more into the Department centre it will be disastrous for reasons given above.

If it means devolving decision making as close as possible to the point of service delivery there could be a positive transformation in efficiency and effectiveness. If it means merging some agencies I cannot see where there is sufficient synergy to outweigh the negatives – perhaps part of VOSA and VCA? Perhaps DVLA to become part of Home Office?

If the goal is to reduce cost by merging senior management teams then please consider that there are probably only say 15 senior civil servants in the Motoring Services Agencies employing c 12000 staff and responsible to Parliament for matters of life and death; while in the central Department there are probably 150 senior civil servants for c 2000 staff who write papers and let contracts. Where should we look first to rationalise? Who has the more unique and effective skills

In conclusion, I honestly believe that the Department now has Ministers who understand and believe in road safety. Please give them the opportunity to consider what more the Agencies can do to prevent the carnage on our roads rather than the previous Ministers who sought to treat the Agencies as though they were Greggs. Allow them to be brave!

Good Luck

- 11. don't know
- 12. DVLA should be broken up as a monolithic poorly performing organisation which lacks digital capability and is not cost effective.
  - The driver services should be passed to your best digital provider, DSA and vehicle services to VOSA to close the holistic services circle
  - Both must remain in the public service to ensure maintenance of quality
- DVLA should be split, licensing should be given to DSA and vehicle side should be given to VOSA
- 14. Each agency deals with different things reorganising them again will only inconvenience the users of their services who know how things work now. Re-defining will spend more money to confuse and inconvenience the very taxpayers who use the services
- 15. Ensure red tape is reduced, keep it simple
- 16. Have you not already wasted considerable millions on the introduction of a shared service centre which you are now outsourcing and which I understand is going to be changed so that all the millions invested have been wasted to date. I suspect that you will again waste money on silly ideas to centralise functions did you not see the petition from the public calling on you to keep local DVLA centres open? People want local services that they can access and have confidence in Government, while not perfect is seen as the lesser of evils.
- 17. I can see some tie up between VOSA and VCA and between the DVLA and the DSA.
- 18. I can see the benefits of re-defining boundaries, easier to communicate, easier admin, lower costs.
- 19. I feel that consolidation of administrative and other back office functions across the agencies would make sense. After all, many large operations work with single HR, Finance, Customer Service and Administration departments. There are cost savings to be made here, providing common sense is applied when awarding contracts.
- 20. I think this is a red herring. The agencies run as businesses and cover their costs through their own fees. The user pays. It's the central department that adds bureaucracy and costs the tax payer, rather than the user of the service. Rather than rationalising the number of agencies, why not just absorb them back into the overall department and brand them all as DfT?
  If merging agencies is the desired outcome from this consultation then there should be



one for drivers (licensing and testing) and one for vehicles (registration, testing etc). But I still think that from a customer perspective having a single identity (ie DfT) behind which the services are brigaded as mentioned above, would be simpler and less confusing for customers.

- 21. I think this may cause confusion to the general public. They should stay as it is.
- 22. I'm against the rationalise the number of agencies.
  You say that this is to ensure that the customer experience is simpler and more straightforward however that I feel that by centralising everything you run the risk of losing essential areas of expertise within each agency.
- 23. I'm sure you will find a way to make it more expensive and complicated than it needs to be. But as long as your pals running private commercial enterprises can continue to rob the british taxpayer blind xxxx (redacted) and give you tory xxxx (redacted) a nice backhander as a "corporate thank-you" who cares about the negative impact felt by british citizens over the next few decades? You're already rich so screw everyone else!
- 24. In some cases VOSA could learn a lot from the other agencies, particularly DSA, with their IT services.
- 25. In theory it is a sensible approach but each organisation holds it's own significant level of expertise, which would be lost or diluted by rationalising the Agencies. If they exist in close proximity it would also make sense but the Government should seriously consider the impact on local employment and economies when considering these proposals. Swansea for example would become a benefits slum without DVLA as a local employer.
- 26. Irrelevant
- 27. It is felt that a more centralised approach to all services is the best way forward which reduces red tape with one organisation delivering all services leading to a more customer focused approach. This in turn will lead to greater financial savings to the tax payer and less bureaucracy as all Agencies will align under one banner.
- 28. It seems that there are plans for fewer agencies to conduct motoring services. With this in mind, I think the DVLA could perform many of the functions and act as a super motoring agency. From a driver licensing perspective, it is involved at both the beginning and end of the licensing process; from the issuing of the provisional licence to the issuing of a full licence. Drivers book their test via DSA and test pass details are sent from DSA to the DVLA. Why not enable drivers to book driving tests through the DVLA? In addition, rather than DSA send the test pass details to the DVLA, staff at the DVLA could key these directly onto the drivers system making the process faster and more efficient. Much of the work performed by DSA could easily be absorbed by the DVLA. They have the staff capacity to handle this from keying staff, to complaints, casework and advice. The estate is based in Swansea including card production, application processing and case work and call centre. In fact, both agencies work to the same road traffic legislation. I understand that the DVLA also hold the vehicle and driver databases which the police, courts, fixed penalty offices and VOSA rely upon to carry out many of their functions. Given this, it seems logical that the DVLA act as the motoring services agency as it appears to perform many of the key requirements

DVLA could also carry out/reform vocational driver conduct cases which I understand are currently dealt with by VOSA. These cases are initially handled at DVLA but passed to VOSA to decide whether drivers can drive lorries/buses again following a court conviction. No reason why this couldn't be handled at the DVLA as this would save the taxpayer money and would probably save unnecessary delays in case handling.

- 29. It should not be done simply as a cost cutting exercise.
- 30. It's yet another way to increase unemployment disguised as a money-saving exercise. Have you not noticed that unemployed people don't tend to spend much money, and that higher unemployment is the natural result of this, as businesses cannot survive



without customers?

- 31. keep dsa as one agency to protect test from privatisation and bias.
- 32. less organisations equates to increased efficiency
- 33. Lowering costs, but increasing consistency will allow trust to be gained with customers making the majority of customers rely on the services, instead of going else where for information. Building more ICT into practises will allow for a much easier transition for information and payments, of course getting into the 21st century.
- 34. More on-line services is a way forward.

  But if this results in less 'human' staff to discuss problems with this is not always positive way forward. It makes things more complex.
- 35. My personal experience of shared back-office functions so far has not been good. Their success depends very much on setting up initial contracts properly and taking the time to find out what end-users need. I don't feel that this is well managed. Giving customers one place to contact (preferably online) has to be a good thing. The public is confused about the difference between DVLA and DSA, for example. One organisation that dealt with everything to do with cars would be good for customer service. But to have that knowledge all centred in one place is a challenge or maybe the challenge is to direct the enquiry to the right person, whilst retaining a central contact-point for the customer.
- 36. n/a
- Need to be discussed with all agencies, private bodies and advisors such as motoring bodies
- 38. Nil
- 39. No (x6)
- 40. No, I am a great believer in "If it isn't broken don't fix it."
- 41. None
- 42. Not at this stage
- 43. Not far enough. Highway Agency should be included and Enforcement brought to the fore. VCA - vehicles into service and register them. DSA - drivers into service and register them. A merged VOSA/HA to be the on road enforcement of vehicles and drivers, perhaps even merged with a proper Transport Police service for roads? Simples.
- 44. only to the extent that any privatisation is monitored to avoid fraud and backhanders
- 45. Privatisation of functions will move the focus from safety and standards to profit and margins, any reforms need to be careful that this does not happen.
- 46. Road safety should be behind these changes, not saving money, and not cutting services in the pretence of improving the customer experience. These agencies all carry out vitally important work in the road safety arena. They are all doing a good job and none of them are losing money as a Trading Fund, DSA is supporting its own work; DVLA was making a large profit until that was taken back under DfT. Why is there a need to change things that work? Why is the government so keen to privatise everything?
- 47. Some areas can be shared but overall the agencies have their own identity and people know what they do. fudging them and merging them and re branding will just add to confusion and misunderstanding.
- 48. The agencies currently carry out work that is aligned to their own areas of work, by joining up agencies this will make the agencies far bigger and will cost more to deliver services. There are lots of things that would make this incorrect. I believe that all of the agencies are currently going through the process of defining their requirements for IT contracts, and putting these out to tender through the new government contracts. Surely the cost of them all doing this and then looking at shared contracts will cost a lot more in the long run and not make savings, unless you stop them now and get single shared IT contracts for them.
- 49. The civil service is long overdue a reform, its very top heavy with too many managers



and red tape.

- 50. The current organisational structures and boundaries are efficient and cost effective. All of the motoring agencies perform high in customer satisfaction scores and DVLA in particular has a strong reputation as an organisation. I believe the rationalisation will damage this and provide a poorer service.
- 51. the integrity of the test is paramount
- 52. The role of traffic commissioners and where they are supported from could be considered as part of the back off rationalisation roles. It seems illogical for DVLA,VOSA and the OTC to all have a role.
- 53. There is certainly a huge scope for pooling resources to provide the services from these agencies.

The DVLA staff from the closing regional sites can be resited in the regional VOSA sites more or less straight away. As the VOSA sites also are sold off, then the combined workforce can indeed by housed in other buildings, eg retail or other public buildings.

If the sell off of HGV/OSV testing goes through then the best fit for the remaining VOSA enforcement staff would be to merge with Highways Agency. If the current on road checks from DVLA are also taken across, then the government would have a single on road enforcement agency to deal with road, vehicle and driver compliance. The DSA would use private premises for driver testing as per the example in GTG Glasgow.

All could utilise a common back office as there are many synergies across each of the agencies.

- 54. These plans will only lead to confusion both inside government agencies and the wider public.
- 55. This seems like an attempt to start the process of privatisation, which is likely to hinder the agencies in delivering better customer services. The agencies will become less specialised and unable to answer queries/issues affectively.
- 56. Using shared functions is sound in principle but these shared functions will also need to be central Government led.
  - The Driving side of motoring services should be merged, this would then lead to 2 organisations instead of the 4 (see earlier response regarding a vehicle based organisation). The Driving Side should be led from the DSA as this starts the learning to drive process and road safety is led from this. They also take the provisional licence from the passing candidate (in most cases) and therefore should have the responsibility for full licence issue. Also as part of the re-issuing of a licence (10 years for photo card) people should be re-tested to make sure they are still a safe driver. This will also aid with decreasing impersonations of learner and re-testing drivers.
- **57.** When services are outsourced all it ever becomes about is profit look at the rail service and the out of this world increases year in and year out. How many road deaths will it take before you realise you were wrong. Not everything can or should be off loaded.
- 58. Who does the job or what the agency title is this decade is irrelevant. The real question should be does this work need doing at all? If the answer is no then stop it. If the answer is yes then the only efficiency on offer is back office support functions, self service or automated testing. Concentrate on the real issues & stop rearranging the deck chairs on a sinking ship.
- 59. Wouldn't it be better to look at the overlap roles of the DVLA and DSA and join these together, some of the DVLA's roles are more suited to VOSA but I cant see how VOSA roles can be passed to the other two
- 60. Yes, move out of LONDON. That would save considerable amounts of money.
- 61. You should merge DVLA and Vosa and DSA and VCA that would be more sensible.



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

- A complete overhaul of the current driving test and rules regarding the teaching of new drivers.
  - The driving test is currently a very negatively conducted test, with huge inconsistencies between examiners. It penalises for truly minor errors but does not recognise generally could driving skills. The test is not extensive enough (it should include motorways for example). It's not really fit for it's purpose neither is the DSA in many aspects. The UK should be following the example of other countries (Australia for example) in how new drivers are taught and the kind of experience they should be required to have prior to taking a test. Motorway tuition of learner drivers by qualified ADI's should be compulsory, not illegal. Our antiquated methods and rules prior to test need a fresh approach.
- 2. A more joint service approach making the customer experience into a one stop shop for all motoring services cutting down on red tape and bureaucracy
- 3. All services can go digital with the right will. With the ability to video call the majority of contact could be face to face if people want it. This will help with re applications etc as face recognition software could be used.
- 4. Allowing the agencies to move forward and ensure they can carry out the work they are currently doing but allowing them to be forward thinking and to carry out work that delivers their own strategies without cuts to staff and funding.
- 5. As a former employee at DVLA I can see merit in this consultation to give the best service to the customer, the tax payer and to ensure that civil servants are doing valued work they enjoy
- 6. As mention'd the cost is far too high for new drivers, daily transport should be an option for all walks of life, only being taken away from those unfit to drive, or unsafe. A 17 year old on a low income has very little chance of obtaining the cost in a self sufficient manner. A more thought out approach is need'd to providing vehicle hire / insurance. For example I need to find £700 to do my mod1 / mod2 with only a 2 year gap to obtain the finance. on top of that I have had to get insurance £435, a bike I got cheap at £1400, the Theory I had to travel too and the take £50 and a whole day, my CBT £120, there is also the safety equipment I have had to get which also is NOT cheap and boot, leathers, gloves, helmet I have spent around £500. Now how is a 17 year old going to afford that?
  - On top of that your also expecting these new bikers to do 3 tests to be unrestricted. So were looking at estimated £2100 in a space of 4 years for people with low incomes. Due to this I think you should provide the insurance, the bike, the instructor at a reasonable rate for there income.
- Create consistency. All tests should be conducted by Government agency examiners.
  Private bus companies, Fire, MOD and Police examiners standards of testing are not
  very good at all, they are often isolated, rarely monitored and this has a significant
  impact on road safety.
- 8. Cut MP wages. Cut MPs pensions. Abolish MPs expenses. Do something about the rampant profiteering of the energy companies. Regulate the press. Regulate the Financial industries they caused this mess in the first place, (or was it the government when they approved all the de-regulation?) Don't rape the NHS. STOP XXXX (redacted) PRIVATISING EVERYTHING YOU GREEDY XXXX (redacted), IT DOESN'T XXXX (redacted) WORK!
- 9. Fewer MPs claiming fewer or only appropriate expenses would be a start. Ministers appointed who have a semblance of knowledge of their Ministry/Department and who wish to contribute to longer term plans and objectives than merely the next General Election. Ministers who put greater trust in their Civil Servants who don't really give a



toss about politics but end up doing mindless things on political whimsy.

- 10. Get rid of all your top heavy management that alone would save a small fortune. Support your front line staff who deliver your services.
- 11. Greater research into locations acceptable to conduct driving tests.
- 12. Having better value for money, as well as consistent information so that every driver will know the constraints without having to reference, making sure there isn't any grey area in the motoring world.
- 13. Hi, I recently read a report on Parkers.co.uk that the government was thinking about scrapping tax discs and using CCTV cameras to scan everyone's number plates to make sure they were taxed as this would save £90m.

However, I wondered if you had considered a solution as used in my home island of Guernsey? Several years ago, they abolished tax discs and simply added a few pence to the cost of fuel to make up the difference.

This saved resources at the local road traffic offices:

Was a fairer method of taxing people through actual road usage;

It didn't need hideous, privacy-invading CCTV cameras all over the place scanning every driver's movement.

What's more, they manage to do this with one of the lowest fuel taxes around, with petrol retailing around 80p per litre.

Another benefit, I'm sure, would be Europeans filling their fuel tanks in Britain as well.

- 14. I believe that further consultation needs to take place with more detail as to what direction the services may follow. At the moment the proposals are very vague and any consultation responses for this reason are also going to be vague. Further opportunity to respond needs to take place before actual changes are introduced.
- 15. I do not see anything wrong with the way services are delivered at the moment!
- 16. I just want to eliminate bureaucracy. If the Government can simplify requirements so as to reduce car insurance paperwork (and perhaps annual charges) that would help myself as a pensioner.
- 17. I would like to see considerably more contact from you to allow me to follow up, with your backing, on test passes. Currently pupils pass and are then left to their own devices, sometimes with tragic consequences.
- 18. If call centres are dealing with personal licencing, vehicle licencing, and also in future have to deal with vehicle testing and certification questions, spreading their experience over an ever wider area their expertise becomes diluted so that they become jacks of all trade and masters on none so it becomes harder to get answers to the more complex queries.
- 19. If you can make test centres within the reach of pdi's and adi for their tests, it will help a lot.
- 20. Improve the telephone service menu system for government call centres. Improve online services and consult with experts from outside the public sector to improve online services. gov.uk is an unprofessional mess of information, direct.gov was a far superior website. if gov.uk is a sign of the quality of future online services then "digital by default" should be scrapped.
- 21. Increase customer self service. Streamline the test requirements between vehicles it's ridiculous that there is such a wide variation in mechanical condition & components tested. Consider the vast variety & standards of application requirements for 'suitable' people depending on who I'm applying to. Get to grips with the poor, clunky out of touch web services that you have just imposed on us.
  - Charge all customers at the point of contact instead of having those that have 'already joined a service' paying for those that want to enter.
- 22. Keep a regional office network rather than fully digital by default as some instances of the work cannot be handled purely remotely by the internet.
- 23. Keep regional DVLA offices open!
- 24. Keep the DVLA offices open. Stop reducing the provision of public services. Stop selling public services off to private businesses.



- 25. keep the offices open, face to face contact with customers is invaluable
- 26. Keep things as they are it works. An investment by the government in road safety would be welcomed, together with a definite road safety plan and targets for reducing KSI figures. Do not privatise any of these important road safety services; 'partners' would call into question the integrity of any road safety service as they are in it for profit, not the benefit of road safety. Do services need improving? Where is the evidence to say that they do, or that they're not working? I thought all of the agencies' satisfaction surveys had good results? This consultation does not have the customer at its core as you claim it does, that's just an excuse for privatisation.
- 27. Learn from the high performers on two levels: Internet services

Cost effectiveness

- 28. Leave an open webpage accessible by an i.d. Where genuine suggestions can be left, an open door policy driven by the people at the sharp end.
- 29. Leave it as it is
- 30. Leave the agencies to operate in their current structure of specialisms but require year on year savings and improved efficiencies. Continue to move to digital by default services
- 31. Leave the test as it is do not make it easier to flout the system. Make it mandatory to be restricted on certain licences at a younger age. More like a graduated licence scheme.
- 32. Less bureaucracy in central government which is constraining the digital agenda. More focus on customer needs through effective insight and research.
- 33. Listen to customers rather than making decisions based on central government policies. The majority of responders to the Local Office closure consultation actually disapproved of the proposals.
- 34. Listening to customers
  - The Agencies do. Sadly DfT does not have such a good practice and as for the Motoring Services unit in London does it know what a customer is? Has it ever met one? What is that layer of bureaucracy for? It would be much better to keep the Agencies, require them to be self financing and generate a profit for the public purse, give them freedom to do what meets those and customer requirements and cut out the London Motoring Services unit and associated deadweight.
  - The paper talks about services being "convenient to customers". Please take care if by customers we mean learner drivers, those presenting vehicles for MoT, those seeking return of licence after medical condition, car manufacturers, all they want is a pass. Very often in the interest of road safety and upholding the law there must be a fail and that is not very "convenient", but it is right.
- 35. Maintain the opportunity for customers to submit paper applications if they wish and also enable a 'human' element to motoring services. I appreciate that digital is the way forward; but it shouldn't replace human contact where necessary or required. What happens when the system goes down you will need people at that point!!
- 36. make available more ways of paying (eg take American express and paypal) also consider quarterly payments for car tax as it is getting so expensive, think could easily be facilitated by direct debit on bank account or credit card if renewing online for the year
- 37. Make the changes for the right reasons.
- 38. More digital delivery and more local contact.
- 39. More online service being available to the general public and more local.
- 40. More on-line services but also keep the channel open for customers to discuss things with 'a human'.
  - Disagree with closure of regional DVLA local offices and if your plans are to down grade or close any other organisations I also feel this is a bad move. Loss of experts and allowing private firms to carry out this work will lead to fraud.
- 41. more rigorous testing and checking of adi's



- 42. My main request is that there should be the opportunity to pay car tax monthly over a 6 or 12 month period rather than the lump sums that we have to pay
- 43. No (x5)
- 44. None
- 45. Nope!!

Improving your services wont make a scratch on the problem.

- 46. Not at this stage
- 47. Offering proper receipts for payments, extending operating hours outside of the normal government 8 till 3pm standard defined day. More weekend/evening appointments for statutory tests to allow people a fairer chance
- 48. Passing the test for older should be flexible, they are not passing master degrees
- 49. Sample questions are easy to get (bookstores), but sample hazard tests are not as easy to find.
- 50. Services could be improved by excluding private business who by their very nature only wish to maximise profit. The person using these services will be he ones to provide that profit.
  - Should the proposed route be taken there will be inevitably be an alarming increase in deaths on our roads and a huge decrease in customer satisfaction due to the cheapened approach that will be demanded by a private provider. So much for putting the customer at the heart of what we do
- Stop closing VOSA test stations the majority of small operators do not want to go to a competitor for their MOT test
- 52. Stop wasting my taxpayers money on silly privatisation it ends up costing me more for service and more in tax to subsidise services I do not use.
- 53. The automation of things like declaring SORN and obtaining a tax disc, and the linking of insurance, MOT and tax disc databases has been a great benefit to the vast majority of motorists.

We are told that thousands if not tens of thousands of vehicles have 'fallen off the books' but are being used on the roads with no tax, insurance or MOT. I see figures, allegedly from the Government, that state that 1 in 15 vehicles \*on the road\* are untaxed i.e. 7%, and that figure rose by 41% in one year at a cost in lost revenue of £217m, but at the same time prosecutions fell by half.

At the moment if any of these vehicles is parked on the highway there is a chance that absence of a tax disc, or an out of date disc, will be noted by traffic wardens or police and others, and maybe even if there is a tax disc but it relates to another vehicle or has been altered.

Remove the tax disc and the only way these cars will be picked up is by ANPR equipment, and only then if there is a police pursuit vehicle associated with the camera to chase and stop the vehicle. How often can one expect to pass through an ANPR check? I see one maybe a couple of times a year, and apart from that I can't remember when I last saw a traffic police vehicle anywhere, which is borne out by figures from police forces stating that these are being reduced still further, again to save money.

I believe this measure is purely to save money and will increase the number of untaxed vehicles putting more costs onto the average motorist. I also believe theft or cloning of number plates will increase, leaving the legal user of the plates with undeserved speeding tickets and goodness knows what else, without any defence unless they can categorically prove their vehicle wasn't on UK roads at the time, which most of us can't.

There is talk of using the ANPR equipment in many petrol stations to detect these vehicles and bar the sale of fuel, or maybe call the police, but that will increase the number plate problem even more, as well as theft from other vehicles and petrol stations.

Unless you put money \*into\* reducing illegal activities like this you will simply make victims out of more people, and encourage more people to think along the lines of



- "well if they can get away with it I'm going to do it" and a further breakdown in lawabiding behaviour
- 54. Wherever tests are conducted there should be toilet facilities for candidates. Halfords are not prepared to do this.
- 55. Yes, please do not allow the mis-use of customer information. Data protection needs to be high on your agenda.
- 56. You could lower the amount that you pay for driving tests and the theory tests because not everyone can afford to pay for the test fees the way they are.



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

- 1. Anything that reduces complexity, or the burden of red tape on basically law abiding motorists has to be welcome. The problems at the moment are that far too many of the existing processes put a heavy burden people who normally try to abide by the motoring laws, and little if any tangible effect on those who insist on driving, trading or using vehicles in an illegal manner.
- 2. Approach seems very sensible overall.
- 3. As a retired Police Officer I would immediately point out that the suggestion of bringing the services closer to the public flies in the face of recent cut backs. In September 2011' eleven Driving Theory Test Centres were closed throughout the UK of which three were in Scotland, which appears to fly in the face of the suggested bringing testing closer to the public. I would envisage in future years purpose built centres that incorporate the Theory Test facilities and Practical Test Centres, and related matters, albeit such centralisation will mean ever greater travel distances for members of the public attending for tests. The Driving Theory Test, as has been well documented in the media, has been the subject of massive frauds by impersonators sitting tests on behalf of others. While this is down to the skills and vigilance of firms personnel administering such tests, it can be a difficult area, and with blue tooth such impostors are managing to fraudulently sit tests especially with voice overs. There are of course ways of picking this up but it is only as good as those invigilating. It is a sad and perhaps not politically correct fact to highlight this is usually being carried out by immigrants to this country with voice overs. The question is, should we be providing such voice overs in the first place, especially on the scale at present. My view is that much more can be done to prevent this than is done at present. Firms bidding for Contracts to run such tests on behalf of the DSA should be able to provide high technology screening to prevent blue tooth being utilised, albeit such screening if in premises, within office blocks, could well affect other firms nearby. Palm/fingerprint/DNA are all things that could, subject to Government decisions assist greatly in this arena. More, much more, has to be done to prevent this, it is not rocket science, it can be done.
- 4. As above
- 5. As it looks like you are going paperless and departments merging. Why don't you put on the provisional licence, a chip on it like you have on the LGV digital card Then driving instructors have in their car a machine that records the time in the car and they need to do a min of 45 hrs before they can take a test ( not book ) . the machine can download to Dsa to keep a record in case of problems with the machine or the pupil looses their card.
- As mentioned earlier, the proposal was clearly put together by someone seconded from DVLA. In the opening paragraphs and on page 17 (about IT services) it is seems openly bias towards DVLA, when other agencies provide much better digital and customer services.
- 7. Centralisation to cut costs is often at the price of reduced safety standards and resource i.e. not enough staff to ensure standards are maintained
- 8. Dear Sir

Thank you for your reply to my letter

It mainly concerned the Government's proposal to abolish the display of road fund license discs on vehicles. Fellow road users agree with me it is not a very good idea. With the display of the above it means the members of the public can at least see that other road users are paying their share.

There are claims that there are at least over a million uninsured motorists on the road. This is totally unacceptable.

In reply to my letter you stated that the police have the capability to check on the road whether or not a vehicle is insured or to be correct the driver is insured. Sadly due to the



economic climate police forces are to be severely reduced. This is going to greatly increase the number of motorists not being caught for driving uninsured.

This is why myself and fellow motorists supporting a visible display on the vehicle as to whether insurance is in place.

Sadly due to the huge cost of insurance for 17 - 24 year old motorists they are sometimes taking chances and driveing uninsured. We intend to write to motor insurers for their comments on the problem.

You ask for suggestions on road safety.

We believe prior to obtaining a driveing license a mandatory eye test be taken at an optician and this evidence be submitted with the license application. An eye test every so many years after obtaining a license submitted to the motorists insurers as to there ability to drive safely.

There needs to be proper deterrent sentences given to people who offend by driveing under the influence of drink or drugs. A zero tolerance approach should be adopted as is the case in some Scandian countries.

A recently reported case of driver under the influence of drugs received an eight month sentence but was then released after eight weeks. Sadly the offender run down a young lady who died.

The rules in sentencing for the above needs urgent review.

- 9. Government consultations are pointless, expensive processes as the Government do not listen to the customer's views anyway. They plough ahead with their proposals whatever the responses say, as the Government have a blinkered view on how to reduce costs.
- 10. Hello, I have several vehicles which are on SORN either for use around the farm, waiting for export or restoration, Why can the SORN notices not be done by email rather than using expensive paper and postage? When and if these need to be taxed we could apply in the usual way. This would save a lot of time and paperwork and I think it needs to looked at again
- 11. Hi chaps. do you not think that the roads could be made safer by forcing learners to pass their theory before being able to get behind the wheel, and how about letting 16 year old's do their theory as it seems that at 17 they just want to drive before they know the laws.
- 12. I agree with most of the stuff on paper at least. But as often the case when major changes are made it seems that sometimes common sense goes out of the window. For example, the changes brought in the motorcycle license category. Even though, as a biker myself I totally agree with the idea of increasing the age for category A license but the rest of it was a shamble done simply without clear idea/definition in a hastily manner just to be in line with the European laws.
- 13. I am sure many in this profession will watch with interest to see what the shape of things to come will be after the consultation results are published. We will not be too disappointed if nothing changes as that is what we are actually expecting, as leopards do not change their spots! When a new leader arrives, be that at Ministerial level or CEO level, the new broom comes out and the rhetoric with it, but not a lot changes on the outside. Surprise us and make our day and start to listen would be the best thing any agency could do, and by listen, I mean not just make notes but act upon what is being suggested.
- 14. I believe road safety is paramount and should not be compromised, for example by privatisation of the driving test. Privatisation would turn the driving test into a money making opportunity and the risk of fraudulent activity would be significantly higher. The idea of merging agencies raises an interesting point. One of the findings of the investigation into the West Coast Mainline contract fiasco was that the merging departments and removing separate management structures/tiers led to insufficient/inappropriate management of the contract. I believe that the recommendation was that those previously removed management tiers/posts be reinstated. There's a lesson to be learned there about keeping things at a manageable size. Let's learn it now, not because of yet another failing of a "good idea".



- 15. I believe that the DfT should avoid viewing the out-sourcing of it's services as the best way to make savings. The DfT should explore the option of linking up it's services in greater detail.
- 16. I believe the driving test should change quite dramatically, driving conditions have.

I believe the driver test should come in either 4 parts or 3 parts if a Driving Instructor is involved.

Without a Driving Instructor (i.e. with a Parent)

Part 1 Theory test, inc. Hazard Perception

Part 2 Off Road 'safety check' to make sure the pupil is at least 'safe'

Part 3 The Main driving test, inc. at least 2 of the Manoeuvres

Then there could be a 6 month to 1 year break, where the driver can drive (perhaps with a maximum of one passenger), which should be followed 'within the year' by

#### Part 4

Motorway test With a driving Instructor

Part 1 Theory test, inc. Hazard Perception

Part 2 The Main driving test, inc. at least 2 of the Manoeuvres Then there could be a 6 month to 1 year break, where the driver can drive (perhaps with a maximum of one passenger), which should be followed 'within the year' by

#### Part 3 Motorway test

- 17. I feel the privatisation options which the consultation clearly point to are a step in completely the wrong direction. Although the VCA and perhaps DVLA could be operated as private entities, to consider such an option with the DSA and VOSA is asking for trouble. Whilst private companies may be able to deliver the services at a lower cost, and perhaps with slightly more efficiency they would not even be close to being able to provide the completely impartial service currently offered by the DSA and VOSA. this can only result in reduced levels of competence on our roads and a general reduction in road safety.
- 18. I have no confidence in anything you have proposed here. Even if you made any sensible proposals you'd find a way to xxxx (redacted) up the implementation of them, because this country is run by absolute xxxx (redacted). I wish I could afford to move to Canada, but thanks to the economic policies of every UK government since I was born I guess I'll never claw my way out of poverty. Thanks a lot you shower of xxxx (redacted).
- 19. I have read the consultation document in depth and generally support the broad thrust of what is being proposed of moving towards putting your customers at the centre of the strategy. I do however as an interested private individual, want to raise one suggestion that I have not seen mentioned that would address a present weakness in road safety and traffic control.

At the moment DVLA provides an excellent service on-line and by phone - albeit with a somewhat long winded answering menu. In particular we have found the tax disc renewal system to be outstanding. If I understand correctly one item being potentially considered for the future is the outright abolition of the tax disc. Prima facie this would be a good move as all relevant authorities who need to pursue unpaid taxes already have ready electronic access to the information.

There is one circumstance however where those involved would benefit from the continuation of a form of paper disc being displayed in the windscreen. In the event of an



accident, insurance details are exchanged between drivers, etc. However we are all aware of the significant number of vehicles being driven uninsured - estimates seem to be above a million+ vehicles. I am proposing therefore the replacement of a tax disc with an insurance disc, which would enable the private individual (who of course has no electronic access to the MID) at the scene of the accident a) identify if a vehicle was uninsured and call the police and b) ensure that correct details were exchanged. Additionally it would provide a visible flag to law enforcement officers, such as traffic wardens, to clamp an uninsured vehicle and/or issue a penalty fine.

This is an opportunity for DVLA to also generate revenue to defray some of its costs by acting as issuing agents of the new insurance disc on behalf of the insurance companies - I imagine a reasonable charge of say £5 per vehicle insured (giving revenue of £150 million+) would more than cover the administrative costs of providing such a service. And the real beauty of this idea is that the DVLA already has such a system in place today - the highly efficient tax disc service - so requiring a relatively small investment to replace tax discs with insurance discs.

The increased on the road transparency that introducing an insurance disc in place of the tax disc (were the tax disc to be scrapped) would greatly enhance the concept of putting the customer first and would aid in driving down the still substantial scourge of the large number of uninsured drivers.

- 20. I think it would be a mistake to do away with the tax disc. I am aware of a number of cases where young drivers have been stopped as a result of ANPR checks and told there car is not insured. They had both bought there cars that day and had got the car taxed before leaving showroom. With out tax disc it very likely that car would have been seized. The tax disc displayed also allow others to report potential un taxed cars. I am in favour of them being taxed online
- 21. I think you are forcing more and more people to deal with faceless organisations who do not care and do not improve a customers and the general publics situation. When will you learn privatisation does not work. Look at the energy industry or the railways i mean how stupid or blind must you be to ignore the fact that it does not encourage customer choice it reduces it and costs them more.
- 22. If the proposal for further toll roads is to come to fruition then the road tax should be reduced or removed.
  - A system similar to Germany of insurance and roadworthyness to be easily displayed for enforcement purposes. This would make ANPR even more effective.
- 23. If your current set up gets such high satisfaction results from your customers, be careful about what you change. You may end up making the service worse.
- 24. Improved efficiency and effectiveness does not automatically mean reducing the number of agencies. The focus of the consultation would be better placed considering how to bring the service closer to the customer by enhancing the status of the current socialist agencies rather than reducing the service availability by reducing head count, estate, direct delivered services and agencies.
  - I think you are asking the wrong questions.
- 25. Involving the private sector for the delivery of driving test will impact greatly on road safety for the worse as profit will be put before road safety

  The privatisation of the railways is a good example
- 26. It appears that the consultation is weighted in favour of the DVLA, in my view this is the worse section of the 4 being covered in the consultation and should be allowed to run any new entity. I do not believe that the private sector should have any involvement on road and vehicle safety and this should be Government owned. My choice would be for the DSA to manage all people based processes as in my experience they are more professional and have more contact points around the country giving people the opportunity to use those locations as a touch point. These locations can still have digital contact within them (such as being a hub for application processes with expert help on hand so things are done right first time.
- 27. It is clear that the drive behind this is to save money and the guff about improvement and



choice is whitewash. When it was proposed to close local DVLA offices Mike Penning stated it was to give the customer "more choice". Why he thought we would buy that I do not know.

- 28. It is felt that a more centralised approach to all services is the best way forward which reduces red tape with one organisation delivering all services leading to a more customer focused approach, this in turn will lead to greater financial savings to the tax payer
- 29. it seems to be quite comprehensive so hope the proposals can be implemented
- 30. It will save Gov money but potentially lead to more problems for the ordinary person and inconvenience for many who are not computer literate.
- 31. It's a start. Let's see what everybody says and then judge you on the reaction to it. Hopefully you haven't already made up your minds and hopefully this consultation will serve some purpose, otherwise it's half a day of my life I won't get back again.
- 32. It's madness.
- 33. My only concern more than anything is the suggestion driving tests can be privatised. This will know doubt lose the integrity of the test as any company will be striving to make a profit and therefore will pressure either more passes or fails rather than concentrate on the strap line of "safe driving for life". With any business it is in essence there to make money and this type of business of driving tests cannot be dictated by this as the safety of drivers and all road users will be compromised. There is history in this type of issue where railways worked well under the government, as soon as they were privatised they have gone down hill and cost the consumer a high ticket price and therefore the number of users have dropped. In regards to the delivery of the test, it is all about what is best for the consumer and I would think we will not have several companies delivering the test but only one. This means they will have full dominance and will therefore not put the customer first. If numerous companies were delivering the test and fighting for the business of customers, corners will be cut, pass rates increase & the overall integrity will go out the window. I do not feel it would be a suitable proposition to privatise testing.
- 34. n/a
- 35. No (x11)
- 36. none (x2)
- 37. Not at this stage
- 38. Not in the sense you focus it.

The problem is that any road user contravenes in one why or the other the Highway Code for the sake of convenience and opportunistic. I can prove this fact any time (which I am sure you are going to ignore). Local Authorities won't enforce illegal parking on the main road that much because they don't want to scare them away because this is one of the MAIN source of INCOME.

So, bottom line is that even if you give the best service possible, that will not stop bad driving, I believe will make it worse.

As I said, your services has got nothing to do with good driving.

I recently lost my job because I told another driver of her wrongdoing and she reported me of offensive behaviour. So, we, the professionals can't even tell another road user what they have done for fear of repercussion.

It is actually very sad, you are just trying to make a service easier but you are missing the big picture.

- I got a ton more to say about road safety and bad driving but I will do so only if you are interested but at the moment it seems not the case.
- 39. One message that is not being conveyed in the strategy is the regulatory role of Motoring Services and the safety issues that arise. Road Safety is of paramount importance and is not even mentioned in the Strategy. It is far more important than the "Guiding Principles" set out in the document although these principles have relevance. The heart of what you do surely must be driven by road safety and this vital function is being ignored. We all want our roads to be as safe as possible. It is much much more than making efficiencies and economics. The private sector is driven by profit and the integrity of licensing, driving tests and regulatory control will be severely diminished if this is passed



to commercial organisations.

In particular relating to the driving test any parent would want their child to be a good safe driver. Not just be able to pass their test. As a road user myself - motorist, cyclist and pedestrian, I too want all new drivers to be safe and careful drivers. There is of course no guarantee of this with driving tests run directly by the Government. It would however be a serious mistake to pass this responsibility to an organisation whose principal purpose lies elsewhere

40. Please can you delete the need for any road tax disc in your review? I am not saying cancel Road Tax... just the need to display one.

For security of cars & other motor vehicles, all the windows should be etched at the point of sale with the original number plate details that the vehicle was registered with the DVLA. This should be part of the MOT and by that means all older vehicles would have to be etched on all windows with the original number plate data. The etching would be a much more certain method of clarification for the purposes of the Police Authorities. By removing the Road Tax Disc system, not only would a lot of money be saved, but also there would be less smashed windscreen crimes.

Finally, please help those who find it impossible to budget for their Road Tax Discs.. let them set up a monthly direct debit of what for them would be sufficient to cover their existing car road tax renewal over 10 months. If the car is changed and they have over or under paid... then a refund or extra balancing debit would be taken on month 10. If this were to be set up... it would ensure a lot more compliance.

- 41. Services need to have integrity best delivered by impartial trustworthy staff supported by a proportionate anti fraud and integrity service delivered across all agencies as a single unit thus providing a greater amount of cost effectiveness
- 42. Should have gone deeper.
  - 1. New drivers include motorway driving
  - 2. If they can't do motorway experience then they should have to provide a certificate before full license is issued.
  - 3. No new driver can drive a vehicle over 1400cc in the first two years of passing
  - 4. Black box should be compulsory for the first two years
  - 5. Medical tests to replacement driving license at 70yrs
  - 6. Any foreign car entering the UK should submit to an MOT within one month of arrival if the vehicle is over three yrs or relevant age to UK rules.
- 43. some of the items are feasible but the joining of agencies and IT systems seems like it will cost a lot of money and is going back to the way things were years ago, that were changed and the agencies were set up.
- 44. Stop wasting money changing things for changes sake.
- 45. testing of any form should be kept in the hands of the government and not the private sector, the private sector is far more open to corruption than the public sector.
- 46. The approach in principle only probably isn't a long way from where it should be, ie to ensure the motoring services agencies deliver the best services in the most efficient manner. But it's hard not to feel there that DfT has some pre-defined outcomes which are not explicit in the document and that doesn't feel right. It's very unlikely, for instance, that the majority of people who will be affected by taking testing to the customer or the proposals affecting DVLA (the general public) will even be aware of this consultation, let alone respond to it. DfT needs to think very carefully about how it presents the results of this consultation and how it claims a mandate for making any of the changes implied by the consultation.
  - One group of people who will be affected who have a significant interest are the motoring services agencies' own staff. While it might be expected that they would not support changes that could compromise the security of their employment, DfT needs to make sure it does all it can to take its staff with it as it embarks on this programme of change.
- 47. The approach does not explain the safeguards that would be put in place following process and the future involvement of private business. No costings of these mentioned



safeguards either. This strategy could and probably will result in greater loss of life which will cost the wider UK economy more than retaining the professionally delivered service that is in place today.

- 48. The approach seems more about saving money than the customers interests.
- 49. The consultation has seriously overlooked the main purpose of the Motoring Services Agencies which is Road Safety. Every few weeks there are more deaths and seriously injured due to road traffic accidents than occur in any major air or rail disaster or any industrial accident. Yet each of those will create a national outcry and demands that it should never happen again. Why do we allow the main cause of death for 18-25 year olds to be death on the road? Before the War in Afghanistan it was said that the biggest cause of death of armed forces personnel was not in combat but on the road. What is the economic and social effect of such devastation to the flower of our youth? What is the effect of these and less life changing accidents on road congestion? On that basis the "customer" of the work of the Motoring Services Agencies is not the candidate for driving/riding test, or the vehicle owner, or the manufacturer, the employer or the licence holder. It is every road user, pedestrian, bus passenger, resident and family member whose lives are changed when road safety fails. It is the UK public whose lives are affected by the economic and social cost. The Strategy should therefore be completely changed to put the emphasis on making a step change in road safety.
- 50. The different agencies are all specialist in their own right, having common back office functions will be difficult. You will be in danger of losing the expertise of those who know and understand the business and regulations of each agency and knowledge and skills could be lost. We have seen from the early attempts at shared services and the criticism by the Public Accounts Committee that, although these schemes look like a saving to the taxpayer on paper, they very often increase the costs, rather than delivering savings and service to the public often are reduced.
- 51. The document is extremely woolie and could be interpreted to mean almost anything.
- 52. The driving test should not be compromised by privatisation. The integrity of the driving test is paramount. Public would have little confidence in the tests impartiality in the hands of anyone other than civil servants, The major focus is about road safety NOT the bottom line of a balance sheet,
- 53. The idea of rationalisation of the organisations may possibly be valid in these straitened but I can't help thinking that, if some of the strategies were to be implemented, it will be to the detriment of quality of delivery and people's professional livelihoods (in terms of presumed job losses).
- 54. The majority of these vital services could stay within government control if you got rid of the dead wood who command huge fat cat salaries. The cost savings would be immense.
- 55. The strategy is deficient it tells me nothing of worth, you have outlined no detail and I suspect this is job justification for the mandarins in Whitehall to show they are doing something, however silly and wasteful. I also suspect that you have made up your minds already and have purposely kept the information from the public. This is just a tick box exercise.
- 56. The Strategy lacks details. I cannot help but be cynical about this. No doubt xxxx xxxx (personal details redacted) and co have made up their mind and this is merely a tick box exercise. It frustrates me that when rationalisation is mentioned it is always those at the bottom that lose their jobs and the well paid senior officials who make the bad decisions remain, protected in their ivory tower. I would like to know how many of those within DfT in those senior positions are going under this rationalisation of services I suspect none.
- 57. There isn't a one hit wonder here. Transport, vehicles & people are a complicated business, stop trying to fit all of us into a neat little box & concentrate on employing experienced, qualified & motivated people, they are your only asset & are capable of offering a great service to the paying public.
- 58. This is a wide reaching consultation. However, if I wasn't an employee I would not have heard of this. None of my family or friends is aware of it. Consequently it's left to "word of



mouth" to let people know!

- 59. To be honest, VOSA deliver a high quality service to the motoring industry, with very direct funding from government. They have delivered this, whilst delivering on the governments austerity targets, not putting up fees and increasing performance with shrinking staffing levels.
  - This is one agency which should be seen as leading the way, setting the standard and should be left alone to get on with it.
- 60. Too much change is happening at once I can't believe this is all being instigated by the E.U.
- 61. Unfortunately I can only see more corruption arising from all these constant changes, by pushing everything away from government and into the private sector you are expecting the same loyalty of those who you are discarding and as proven every time it does not work. Even in the last weeks we have seen such discredited actions even though it is in the public sector. NO it is just another get out with poor leadership expecting to sit and watch with someone else to blame when things go wrong. The system has worked for many years why change things and completely loose control
- 62. Whilst eliminating paper road tax disks may save money, it removes the on the street evidence of being road legal. Instead a process which is simple should be available to inform on vehicles not displaying.
  - It should be extended to show insurance and MOT
- 63. You say that customers want "services at more convenient times of the day and at lower cost" how can you deliver both a 'better' service and more cheaply? Lowering the cost of services also implies that road safety is not important; is that true? Offering these services to outside organisations is not in the benefit of road safety, it is cost-cutting and privatisation.
- 64. you want to rationalise the number of agencies and reconfigure our organisation to reduce cost and improve consistency.
  - Improve consistency by making all better or all worse?
     We are committed to greater sharing of back office functions and a reduction in our
  - Sell off the estate for some quick cash and sack hard working, knowledgable staff in favour of burdensome self service or minimum wage call centre staff who couldn't give two hoots thanks!
  - We are equally committed to ensuring that the customer experience is made simpler and more straightforward.
  - Simpler for whom? Simpler = you will impose fines on other people / organisation for not doing what you should be doing yourself.
- 65. Young bikers would be safer if they had to do the theory test before coming for CBT. A 16 year old can pass CBT and is then legally on the road without necessarily having become familiar with the Highway Code
- 66. Your approach would seem to be hiding behind austerity measures and using it as an excuse to cut services, soon these agencies won't be able to deliver to the public what they should be doing, so you will have an excuse to thin down even more
- 67. Driving Tests should only be conducted by a government body and not a profit making organisation who may not be as impartial as the DSA