



Department for Transport

MOTORING SERVICES STRATEGY CONSULTATION

Summary of responses - Other

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. slightly
2. Yes. Businesses use on-line and email services to improve efficiency and it is essential that government departments keep up.
3. Driver Licensing will help, however, with complex issues, such as some vehicle taxing, I think that closing the local offices and taking away the face to face contact, it will have an adverse affect on the DVLA as a whole.
4. Yes (x2)
5. I hope so. Time will tell.
6. Yes. An increase in digital services (i.e. digital from end-to end) will reduce the complexity and duplication of the services and systems that need to be managed and maintained.
7. Only if you make them simple and easy to use. Many of your e enabled services are far to complicated
8. The General public have an expectation that digital services are the way forward. The DfT have taken great strides to enhance the use of digital and online services to date which should be welcomed and applauded.
Anything that saves cost by bringing the testing to the people must be a worthwhile consideration as the DSA estate in particular, is a significant expense to maintain. Theory tests are managed and delivered by a contracted company, currently Pearson Vue. Whereas Practical tests are due to be delivered by DSA at Halfords, Supermarkets and University sites, Outforce are part of the DSA(FIT) contracted to investigate fraud at Driver Theory and Practical test centres in addition to internal fraud investigations. We would recommend 'piloting' change in the first instance, to ensure that security measures are in place to record the candidates arriving for testing, a process that is currently in place for the Pearson Vue theory test. There is significant evidence that implementing prevention measures at the introduction of change processes work (Fighting Fraud together)
This would go a long way to protecting staff and preventing and detecting impersonation offences. Our investigations rely heavily on the advancement of digital and online data most importantly CCTV evidence in respect of theory test but the lack of digital evidence in the Practical test limits the DSA's possibility of detecting the fraudster at DSA owned centres. Fraudsters are not concerned about CCTV as a matter of course however once the DSA(FIT) have identified a fraudulent test this evidence is vital for a prosecution case to be instigated.
The use of digital tools such as ipad etc offer the opportunity of Driving examiners photographing ever person taking a test for the DSA at Practical test centres where ever the test takes place. However this should not be at the exclusion of CCTV as so often the original candidate is accompanied by the impersonator at the check in. I have outlined the investigative process in more detail in a later section of this document.
9. no
10. Possibly
11. Digital services are now the norm in many industries dft has to do the same, definitely yes. but keep it simple
12. Only if supported by an efficient telephone customer service system. It is not possible to deal with all issues electronically



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

1. The agencies should ensure that more accurate and realistic assessments of vehicle performance and fuel consumption figures are incorporated and published.
2. Joint venture or mutualisation would seem to be most favourable to generating improved outcomes.
3. DfT should look at far reaching options like contracting out VCA's work on certification
4. This is not a service we have any contact with albeit overseeing the services provided by the DfT we believe that they could equally be subject to fraud and deception in respect of vehicle parts in the future. We know there is a market for counterfeit aircraft parts so why wouldn't there be for car parts especially with new designs for low emission vehicles.
It may be prudent for the DfT to use the services and experience of the DSA (FIT) team to investigate, detect and prevent fraud and corruption in respect of both internal and external investigations across the DfT agencies. This would prove to be a important 'value for money' initiative. Please see Fraud prevention initiatives in Question 9.
5. I believe that as a business unit working in a highly commercial environment, the VCA would be stronger and be able to grow more significantly if it formed a partnership with another organisation which has experience of driving commercial growth whilst preferably also being sensitive to the legal, regulatory and statutory responsibilities of the VCA. I note the options of outsourcing, mutualisation and joint venture are being considered and I would like to contribute further to that debate - my initial view being that a proper joint venture would make more sense than either outsourcing or just mutualisation.
6. Issue not relevant to the MOD
7. nil



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

1. it would be beneficial as long as the practicalities of the driving test are considered as opposed to merely satisfying tick boxes and numerical targets. The most practical roads for driving tests should be used as opposed to merely the locality. My customers would rather travel an extra few miles to roads they can drive on without being 'talked through' because without knowledge would be impossible to drive on safely. Perhaps they wouldn't mind waiting an extra couple of rings before the phone is answered if it helped to have smooth roads to drive on.
2. Less travelling for staff taking LGV tests saving time and expense
3. This will be dependent on what areas you cover? Otherwise it would make no difference. For example if a test could be conducted in say Newport Pagnell, or other areas in Milton Keynes. Not just Bletchley.
4. For our business, this will not have any substantial impact.
5. Likely to benefit large operators but not individuals or small operations.
6. It would help to make motoring more accessible.
7. Outforce are contracted by the DSA, as part of the DSA Fraud and Integrity Team (FIT), to investigate identity fraud in respect of the Driving Theory and Practical testing processes.

The DSA have taken a very bold step in investigating fraud but without its approach hundreds if not thousands of unqualified drivers would be driving on our roads, the suspects are extremely 'online savvy'. In addition they also understand the booking processes and are able to book online tests at late notice for their advantage to enable corrupt testing using differing cheating tactics to obtain a Driving Licence.

(Statistics are available in relation to all Fraud and Internal investigations undertaken by the DSA(FIT) at Nottingham.)

The Driving Licence is not always obtained to facilitate driving. The Driving Licence is the most regularly used identity document in the UK and not surprisingly then it is the number one identity document used by fraudsters, especially for banking and benefit fraud. (CIFAS reports 2012).

Fraud is widespread by way of impersonation and other methods of cheating at test centres across the Country. The integrity of the Driving Test process is seriously put at risk as a result. It is therefore imperative that any new developments initiated to ease the delivery of testing to the front line are tried and tested before roll out.

Considerations needs to be made for fraud committed inside the organisations as well as outside. Unfortunately in these times of austerity staff members have been tempted to commit fraud or forced into committing fraud by criminal gangs. These people are enablers for the offenders few realise that the courts view corruption of a public servant very seriously most go to prison, regardless of previous good character. Some enablers charge as little as £500 to facilitate an impersonated test. Most young people spend over £1000 to pass their test legitimately, surely the message cannot be that cheating is ok.....

The DSA(FIT) have accumulated significant data, knowledge, skill and experience in fraud investigation, detection, disruption and prevention, committed by offenders both inside and outside the agency.

Digital development and online facilities delivered for the benefit of the law abiding public are great steps forward however they will continue to be subject to infiltration by the criminal. It is essential that actions are taken to reduce the ease by which criminals can learn, change and exploit quality new developments under consideration by the DfT, to their own advantage.

All new developments must be risk assessed to ensure security measures are in place



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both to deter those intent on fraud and corruption and facilitate the law abiding public's demand for change. Some may only require simple changes to increase security. Many can be achieved with greater 'joined up thinking' applied across the range of DfT services both now and in the future.

EXAMPLE;

The DSA(FIT) have evidence that fraudsters have in some instances, via the DVLA, swapped genuine 'candidates photos' for 'impersonator photos' to enable an impersonated test and then once the test has been passed by the impersonator change the photo back to the original candidate. This action facilitates an unqualified driver to have a full driving licence allowing them to drive a motor vehicle on the road. Once the Licence has been issued it is difficult to dispute its authenticity after thirty days when the CCTV at a theory test centre is destroyed. The impersonators are aware of the demands placed on the DVLA with a naturally high volume of photo changes, it makes detection very difficult.

From the example given it can be seen that the DSA and the DVLA are sufficiently distanced in respect of the testing and registering process, so not immediately aware or alerted to this type of fraud.

This is just one example of where the testing agency and the registering agency have no connection or influence and work in silos unaware of the impact of one another's actions until intelligence is gathered from the offender by the investigator. The Driver Licence is a valued document for criminals, some offenders will have more than one driving licence in differing names and addresses. It would be an interesting experiment to examine multiple addresses in the testing registering process. This is where 'Joined up thinking' with clear lines of administration may go a long way to combating the mechanics of this type of criminality.

There is no doubt that the DSA are being infiltrated by organised crime gangs, An impersonator is currently charging £1500-3000 for test impersonations. Some impersonators are operating daily across the DSA testing network committing 6 impersonated tests a day. The investigation of these cases requires knowledge of the DSA/ DVLA systems and processes to adduce information, intelligence and evidence, to, through meticulous investigation bring, the thankfully small but dangerous number of criminals to book.

Transportation is a primary key to the success of our Nation it is therefore essential that testing services and registering services are delivered efficiently, effectively and with the highest degree of integrity. Without this we can never reduce the number of serious and fatal accidents or increasing frauds instigated as a result of fraudulently obtaining a driving licence.

Investigation to the point of a prosecution is increasingly the domain of the service provider, the Police service can never be expected to gather all the necessary evidence or deal with all crimes reported to them.

Unfortunately due to the many demands on Policing services most officers have little or no idea about the information DSA hold or the problems the DSA face with test centre impersonation.

The Police service therefore welcomes the support of DSA(FIT) investigators as;

1. Fraud, even Identity fraud is not a Policing priority.
2. The Police have limited resources and little or no experience in dealing with these crimes. Neither do they understand the intricacies of gathering DSA/DVLA evidence to prove the case.
3. Our information and intelligence gathered during primary investigations is proving to be of value to Police forces in the fight against fraud as it is so often linked to local organised crime gangs wanted for not only nationwide fraud but local crime and other frauds across Government and banking related agencies. The DSA(FIT) has seen a rise in joint investigations with the Police, especially in London.

This form of offending impacts on the safety of our neighbourhoods, it is therefore essential with the advancement of technology that Government departments realise



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that the Police are not the only authors of intelligence, Government are frequently heard to say 'we are in this together'!

'The public sector loses £21billion a year to benefit fraudsters, tax cheats, dishonest employees. That's the equivalent of 800 secondary schools and over 615,000 nurses. (and probably numerous road network improvements) In the past Government has not been joined up in tackling this- even within departments. At the heart of our new collaborative approach-and underpinning everything we do- will be new intelligence sharing architecture. We need to take off our collective blindfold and share our intelligence on known fraud and fraudsters and make this a basis of our common defence.' Rt hon. Francis Maud MP February 2012

The Driving test, to many of our young people is the first step to freedom of passage into adulthood, cheating demeans the effort of those who genuinely work hard to achieve the England , Wales and Scotland Driving standard and most importantly erodes the integrity of the testing process. If the Agency doesn't uphold the standards of the driving test what consequences do we as a nation face with increased criminality, accidents on our roads and what sanctions do the Driving agencies face in their duty of care?

By taking the steps below there maybe a better chance to fight fraud across the DfT:

- Carry out a fraud risk assessment - including results from past reviews and audits to identify the biggest risks and vulnerable areas, and including mitigating actions for each risk
- Improve controls - including making sure they cannot be compromised by collusion or management override.
- Put in place an effective governance structure - including appropriate lines of authority, Board oversight, proper authorisation of transactions, and communicating key messages from the top
- Monitor activities - including independent checks on performance and compliance with policies and procedures
- Improve security of physical assets, access to data and money
- Segregation of duties - splitting up activities so no employee has control over a whole process from start to finish
- Education - teaching and training employees about the risks of fraud and what to do if they suspect fraud

Although hit by fraud, it is often possible to recover. The vital thing is to ensure that the lessons that have been learnt the hard way are not lost.

An important step to recovery is to conduct a complete review of your organisation's processes, controls and governance. This should help discover where improvements can be made to any vulnerable points within your company.

Taking testing to the people has value but must be monitored and reviewed to avoid the greater opportunity to impersonate.

Please consult with the DSA(FIT) on our experiences to help reduce and disrupt crime.

8. not
9. Not relevant to the MOD as we conduct our own theory & practical tests.
10. As a business we can provide facilities for online testing.
However practical tests should be carried out by independent examiners to ensure no conflict of interest



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Summary of responses - Other

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

1. It is important to review the test content and assessment criteria to ensure that the test keeps pace with changes in vehicle design and meets the needs of modern transport systems.
2. Testing at private sector providers premises will allow for clearer communication between testers and repairers which should lead to greater efficiency
3. Don't deal with Hgv
4. Red tape is a result of government legislation, organisational policy and administrative capability. These can all be addressed outside of an expansion in use of private sector providers but change is often facilitated and implemented more quickly with organisational change. The aim should always be to remove red tape – this takes a change in attitude on the part of those who create / enforce it.
5. I see no movement on VOSA closing sites that have ceased testing - until this happens I question the benefits.
6. No
7. There is evidence that if this is to follow a similar route to the CPC testing then thoughts should be given to following the Southern Ireland approach where testing is encapsulated in legislation in order to ensure that the provision of testing services is enforceable and delivered to a regulated standard in order that the requirements of training are robust and provable.
Regular repeat testing for Bus Drivers, HGV Testing to ensure capability and safety would be better delivered by way of a regularised provable test in the similar format of the current Theory and Practical tests. Outsourcing is an option but again standards must be maintained and monitored by the DfT to ensure robust integrity.
Before outsourcing driver testing it is essential the DfT examine the development of CPC testing. There must be a way of ensuring that poor standards of training or cheating are sanctioned and testing services prohibited of re-establishing themselves under a different guise.
The DSA (FIT) have experience investigating internal corruption at CPC and Bus Driver testing that may be of benefit to the development of Bus and Coaching driver testing plans long term.
8. Not relevant to the MOD as we conduct our own practical tests already.
9. By carrying out vehicle inspecting using VOSA staff in a controlled environment, standards of inspection and road safety are maintained and controlled.



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Summary of responses - Other

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

1. It must be acknowledged that some functions do require specialist staff to deal with certain technical issues and to handle communications with individual members of the public.
Bringing common services together has proven to reduce the ability of staff to deal promptly and effectively with specific 'industry' related issues.
An example of a serious deterioration of service to the public is clear to see with the new amalgamated central agency website arrangements. The DSA website has always been a most complicated and user 'unfriendly' tool. However, the new DfT / Business Link website is seriously less user friendly and less productive being even more difficult and more complicated to use. Much of the previous important and relevant information cannot be easily located and in some cases has disappeared completely.
The Driving Standards Agency (DSA) originated some 25 years ago, being formed from what then was the 'Driver Testing and Training' division of the Dept of Transport. Despite a few flaws one cannot but agree that working as a devolved agency under the current system the DSA have presided over an unprecedented reduction in KSI's in that same time.
There is absolutely no evidence that re-integration into a revamped Dept of Transport will improve standards or service to the public. In fact history proves the opposite.
Even if privatisation is the hidden agenda, the monitoring of standards must be set, controlled and monitored by a specialised, semi autonomised group such as the DSA.
2. Organisational boundaries are set by the need for management control. If the focus is changed to the delivery of discrete value to a customer (either internal or external), this will improve performance wholesale and if the organisational attributes are then added to support this value delivery, this should stop the creation of arbitrary boundaries and unnecessary complexity (e.g. overhead).
3. You should consider including Highways Agency in the work. There is a clear synergy between Highways patrol officers and VOSA stopping officers work.
4. No (x2)
5. Most members of the Public and the Police believe the DSA is part of the DVLA. Very few are aware of the work undertaken by the VCA and VOSA are seen as the people responsible for roadside checks and lorry testing. There is real value in reviewing and linking the services provided by all agencies across all the DfT and forging new streamlines of work, maybe one Department to aid working practices and the publics understanding of how services are co-located and efficiently delivered. (I am sure the public will for years will call it the DVLA or even SWANSEA no matter what). If this is a step 'too far' there may be merit in the delivery of two larger 'sub agencies' under the DfT. DVLA in Swansea and the 'testing agencies' DSA, VOSA and VCA. This may add clarity to operations and public perception in addition to savings across the DfT.
The start of this process may be in sight with the establishment of the current shared services HR, Recruitment at Swansea.
Integrity in every part of the DfT is essential to deliver standards, training, education, certification, compliance with the law, registration and the recovery of unpaid tax.
There is value in examining the process from the Application for a Provisional drivers licence, through testing to the delivery of a full licence to reduce fraud and streamline processes. The general public will have a greater understanding of the role and landscape of the DfT and significant savings will be made as a result.
From liaison with other elements of the DfT and similar Government agencies for whom Outforce undertake investigations it is evident that the same offending groups are responsible for cross government fraud and fraud trends.
6. It could well make sense to save costs by having common service provision to the various business units, if ownership were maintained and only certain services



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Summary of responses - Other

outsourced, but if a proper joint venture were established the 'commercial partner' would already have these support services so the savings would arise in any event

7. nil
8. Need to ensure sufficient staffing levels of back office functions.
9. The move to centralise Operator licencing at Leeds was a mistake as it radically reduced the number of back office staff to a point where there aren't enough bodies to handle the work and queries take forever to resolve.



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Summary of responses - Other

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

1. I feel the service regarding driving tests could be improved if less time and money was spent on the process leading up to driving tests and more was placed on delivering a fair and reasonable product ie driving tests on roads that don't require extensive local knowledge and on road surfaces that can be driven on without fear of disappearing down potholes and having lines and instructions which can be clearly seen. We try to encourage drivers to look ahead but that is well nigh impossible when our eyes can't be lifted off the ground. spend less on processes and more on practicalities
2. Keep it simple and allow specialists to have direct contact with their clients.
3. Whilst the closures may be of a financial benefit to government bodies, I think it will have a detrimental affect on the public as a whole.
4. You could clearly keep us informed about changes more directly. So many adi's feel they find out things through the great vine.
5. Complexity needs to be reduced through end-to-end service / process review and the information that forms the heart of these services needs to be customer centric and held in a central architecture which maintains currency.
6. Look at bringing all these agencies back into DfT to provide better VFM to the tax payer by centralisation of functions.

7. No

8. Digitisation and online services have improved the speed by which we can detect offending. With limited resources there is much more that new processes may be able to help us in the investigation of crime. To do nothing is not an option and dangerous to all. A serious or fatal accident incurred by an innocent party committed by an unqualified driver is not only devastating for any innocent parties involved but costs Government approximately £1m per investigation.

It is therefore essential that activity is undertaken to detect fraud at the testing stages with dedicated capable staff. Evidence shows that well presented cases will be accepted by the Police as these are ready detections, a distinct Performance indicator for the Police service.

However understanding the intricacies of testing processes, digital networks and adducing evidence for prosecution requires the agencies to follow the example of the DSA.

The CEO of the DSA had the vision to ensure integrity in the testing process was paramount. Those who work hard to pass tests legitimately should not be usurped by fraudsters, neither should our families be put in danger of untrained drivers taking to the road.

From our investigations with major Police forces across the country we are acutely aware that the DVLA crimes sent to Police forces are rarely investigated, offenders are escaping prosecution and intelligence is lost because of the lack of action in this respect. There is no integrity in this process.

The DSA have achieved a better detection rate than the DVLA on a lot smaller budget for enforcement. Lessons could be learnt, to cascade best practice across the DfT to develop joined up working practices in the investigation, prevention, detection and disruption of crime.

There are increasing concerns over the CPC process in England and Wales and the effective delivery of services by April 2014. The EU has driven this process. Southern Ireland have recognised the CPC fallibilities and have enshrined the process in legal guidelines to ensure its integrity. With the increase of regular re testing for HGV and Bus Drivers it is essential that the DfT has the power to prosecute those who flagrantly attempt to abuse the new



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processes implemented. We know currently the CPS have no desire to prosecute CPC test services who are wilfully uploading hours without delivery of legitimate training.

As Investigators with over forty years experience at a senior level in both Policing and Commercial investigations, we believe there is much more the DfT can do to reduce the amount of fraud surrounding Driver testing and other elements of our valued DfT responsibility by the provisions laid out in the prelude to this consultation document.

The Driving licence in the UK is the number one identity document and is therefore the number one document used in fraud.

9. Specific to the MOD:

- consideration of on-line licence applications for military applicants.
- Access to limited driver licensing information by MOD licensing staff (Licence number, issue number, category entitlements & endorsements).

10. Nil



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Summary of responses - Other

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

1. see above
2. Keep it simple and allow specialists to have direct contact with their clients.
3. Focusing on the customer alongside value creation and reducing organisational complexity will delivery significant performance improvement. The skills to make this happen are critical.
4. There are significant, valuable changes within the consultation document that have the desired impact of reducing cost for the DfT without detracting from the delivery of service to the public.

This response is very much focused on the crime and particularly fraud, committed inside the DfT and by those externally intent upon disrupting the integrity of DfT services.

History has shown us that many ordinary developments in digital and online services delivered with good intent, provide the means or temptation to commit crime by criminals and subsequently criminal gangs. The introduction of products over the past twenty years such as mobile phones, cash machines, online banking have created a crime "harvest". As a result modifications have been made to various products but sometimes this happens after major losses have been incurred. In times of austerity these are costly lessons.

However some crimes are being eradicated by 'joined up' thinking and education, theft of car radios and drink driving are just two examples.

The DfT through this consultation document have 'value for money' in mind with the delivery of new and innovative services. Using the knowledge and skill of experts within the Departments they can avert possible 'crime harvests' from new products. This can additionally be supported by developing a 'problem solving capacity' to deal quickly with any unforeseen crime threats caused by criminal exploitation of new and existing products in a fast and efficient manner.

Thank you

5. I am writing with regard to your department's Motoring Services Strategy consultation. The Scottish Government welcomes the opportunity to comment on the future direction of the four agencies covered in the consultation. Rather than responding to each question in turn, I will instead offer our general views on the proposals. You are already aware of my position on Scottish DVLA local office closures and disappointment that these will go ahead later this year. With this in mind, I would urge you to confirm that any changes to the way in which motoring services are delivered do not lead to further potential job losses in Scotland. This is particularly relevant to the DSA and VOSA.

The consultation raises a number of interesting proposals. The Scottish Government supports the use of digital technology to deliver improved services where possible, and we believe that the greater availability of online motoring services will be welcomed by the majority of stakeholders. We are also keen to learn more about your proposals to bring services closer to users, such as the DSA's trialling of offering practical tests through Johnstone Fire Station. I believe that this type of initiative has the potential to benefit users, particularly in certain rural parts of Scotland, though due consideration must be given to the continued provision of adequate facilities for DSA staff and test candidates.

While we recognise the direction of travel away from government-owned lorry and bus testing stations towards an increased number of private Authorised Testing Facilities (ATFs), we would support active consideration being given to the testing of specialised vehicles, such as vehicles which carry livestock. While the testing of specialised vehicles may be less financially attractive to ATFs, it is vital that these services continue to be available across a broad geographical spectrum, including rural and remote parts of Scotland.

I understand that your department is engaging with Transport Scotland officials and



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trust that this will continue as the consultation process moves forward. I would also ask that you give consideration to responses from key Scottish stakeholders, including the freight industry and road safety organisations.

6. No (x2)
7. nil
8. see above
9. Keep it simple and allow specialists to have direct contact with their clients.